Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume I of IX
(Chapter 1 – Chapter 2)

Prepared for
County of Nevada

December 2022

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Idaho-Maryland Mine Project
Final Environmental Impact Report

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1. Introduction and List of Commenters

1. INTRODUCTION AND LIST OF COMMENTERS

1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) contains agency and public comments received during the public review period of the Idaho-Maryland Mine Project (proposed project) Draft EIR (DEIR). This document has been prepared by Nevada County, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the DEIR and purpose of the Final EIR, identifies the comment letters received on the DEIR, and provides an overview of the organization of the Final EIR.

1.2 BACKGROUND

The DEIR identifies the proposed project's potential environmental impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the DEIR:

- Aesthetics;
- Agriculture and Forestry Resources;
- Air Quality, Greenhouse Gas Emissions, and Energy;
- Biological Resources;
- Cultural and Tribal Cultural Resources;
- Geology, Soils, and Mineral Resources;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Population and Housing;
- Noise and Vibration;
- Public Services and Utilities;
- Transportation; and
- Wildfire.

In accordance with CEQA, the DEIR was sent to the State Clearinghouse (SCH# 2020070378) for distribution to State agencies. The public review period began on January 4, 2022 for a 60-day public review period, which was extended to April 4, 2022 for a total public review period of 91 days. In addition, the DEIR and Notice of Availability (NOA) for the DEIR were published on the Nevada County Community Development Agency website. Printed copies of the DEIR were made available for public review at the Nevada County Planning Department (950 Maidu Avenue, Suite 170, Nevada City, CA), as well as the following library locations: Madelyn Helling Library (980 Helling Way, Nevada City, CA); Grass Valley Library – Royce Branch (207 Mill Street, Grass Valley, CA); Penn Valley Library (11252 Pleasant Valley Road, Penn Valley, CA); and Truckee Library (10031 Levon Avenue, Truckee, CA). A Special Public Meeting before the Nevada County Planning Commission was held on March 24, 2022 to solicit public comments regarding the DEIR.

1.3 PURPOSE OF THE FINAL EIR

Under CEQA Guidelines Section 15132, the Final EIR shall consist of:

1. The DEIR or a revision of the DEIR.
2. Comments and recommendations received on the DEIR.
3. A list of persons, organizations, and public agencies commenting on the DEIR.
4. The responses to significant environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final EIR:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

Under CEQA Guidelines Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the County's decision-makers.

Pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence, and is subject to adoption by the County's decision-makers along with the Findings of Fact. The Idaho-Maryland Mine Project would result in significant and unavoidable impacts related to the following: substantially degrade the existing visual character or quality of the site and its surroundings (Impact 4.1-2); long-term changes in visual character (Impact 4.1-4); generation of a substantial temporary increase in ambient noise levels in the project vicinity (Impact 4.10-1); and conflicts with a program, plan, ordinance, or policy addressing study intersections (Impacts 4.12-1, 4.12-8, and 4.12-10). Thus, a Statement of Overriding Considerations must be adopted if the project is approved.

1.4 CRITERIA FOR RECIRCULATION

Pursuant to CEQA Guidelines Section 15088.5, Recirculation of an EIR Prior to Certification, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. Pursuant to 15088.5(a), "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043)

The following discussion will evaluate the four above criteria and demonstrate that the changes to the DEIR text presented in Chapter 3 of this Final EIR do not require recirculation of the DEIR.

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

Pursuant to CEQA Guidelines Section 15088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. Chapter 3, Revisions to the Draft EIR Text, of this Final EIR includes several minor changes to the DEIR text as a result of public comment that serve the purpose of clarifying or amplifying the discussion in the EIR without identifying new significant impacts. The majority of modifications consist of small, targeted revisions, consisting of minor additions or deletions. A few modifications involve larger additions of text, but the relevant criterion is not the extent of the modification, but rather whether the added text identifies a new significant impact. For example, this Final EIR includes a new discussion of California spotted owl in Chapter 4.4, Biological Resources, of the DEIR, based on public comment and release of additional layers in California Department of Fish and Wildlife's BIOS database that confirmed previous spotted owl occurrences on the Brunswick Site. BIOS identifies four previous sightings of California spotted owl on the Brunswick Site, with a nest record from 2011 and non-nesting owl sightings in 2012, 2016, and 2018.

As discussed in Master Response 37 – Birds and Raptors, of this Final EIR, two California spotted owl surveys were conducted on the Brunswick Site in August 2022 pursuant to USFS protocol and no California spotted owl were detected. Further, Impact 4.4-2 of the DEIR already identifies that the Project could result in a significant impact to nesting raptors and other migratory bird species, and thus, includes Mitigation Measure 4.4-2(g) requiring a pre-construction survey for nesting raptors and migratory bird species prior to surface disturbance and avoidance and minimization measures in the event a species is identified. California spotted owl is considered a raptor, and while it was not specifically discussed in the DEIR, it is within the category of raptors for which the DEIR already identified a significant impact and required mitigation (MM 4.4-2(g)) protective of raptors. Nevertheless, for clarity, Mitigation Measure 4.4-2(g) has been revised to reference the California spotted owl by name and provide additional details regarding applicable survey methodology. The mitigation measure is not considerably different and the applicant has agreed to the revised mitigation measure (See #3 below). The above-described revisions to the EIR discussion and MM 4.4-2(g) do not result in a new significant environmental impact.

In response to public comment, this Final EIR also includes discussion in Chapter 4.4, Biological Resources, of riparian bird species. As discussed in Master Response 37, these riparian bird species were not detected on-site during field surveys and the DEIR already identifies that the Project could have a significant impact to nesting raptors and other migratory bird species, within which the riparian species would be included. DEIR Mitigation Measure 4.4-2(g) requires a pre-construction survey for nesting bird species prior to surface disturbance and avoidance and minimization measures in the event a species is identified. Therefore, the potential impact to these species has been analyzed and addressed in the DEIR. Nevertheless, for clarity, this Final EIR includes revisions to Chapter 4.4, Biological Resources, to include discussion of these riparian bird species and targeted revisions have been made to Mitigation Measure 4.4-2(g) to reference these species. These revisions to the EIR discussion and MM 4.4-2(g) do not result in a new significant environmental impact.

In response to public comment, it was also determined that the truck traffic percentages along study roadways needed to be updated in the transportation analysis. These corrections were made to the transportation analysis, an updated version of which is included as Appendix N to this Final EIR; and Chapter 4.12, Transportation, of the DEIR has been revised accordingly in this Final EIR. For example, Tables 4.12-2, 4.12-10, 4.12-11, 4.12-18, and 4.12-19 of the DEIR, reporting study intersection levels of service (LOS), and Tables 4.12-14, 4.12-15, 4.12-22, and 4.12-23 reporting study intersection queues, were updated in strike-through and underline format. However, as demonstrated in this Final EIR, in no case do the revisions trigger a new significant impact at study intersections, when comparing the updated values to the thresholds of significance used in the DEIR. Thus, these corrections do not warrant recirculation of the EIR.

As also shown above, the DEIR incorrectly used the Home-Based VTM per Worker, presented in Table A-3 of the SB743 Report,[1] as the threshold of significance for the project. The Total VMT per Service Population presented in Table A-4 should have been used as the threshold of significance in accordance with the Nevada County Traffic Impact Analysis Guidelines (June 2020). The northern portion of the Brunswick Site is partially in the Grass Valley sub-area and the southern portion is in the Unincorporated Western Nevada County subarea. The use of Total VMT per Service Population for Unincorporated Western Nevada County of 18.1 is the most conservative approach and the threshold of significance is 14.3% below the subarea mean with a value of 15.5 VMT per Service Population. As shown in updated Table 4.12-16, the proposed project is modeled to generate a daily rate per service population (employee) of 14.4 VMT, which is more than 14.3 percent below the unincorporated area metric of 18.1 VMT per worker (i.e., 15.5). Sections 4.12.2 and 4.12.4 of the DEIR have been updated to reflect these changes, as shown in Response to Comment Agcy 8-29. The above-noted errors, which are corrected in this Final EIR, did not affect the DEIR's conclusion related to the project's VMT impact in any way, which remains less than significant, as stated in the DEIR. As such, the above-described corrections to the EIR discussion did not result in a new significant environmental impact.

As discussed above, the remaining revisions to the DEIR, as presented in Chapter 3 of this Final EIR, are small, targeted revisions that serve to clarify or amplify the existing adequate DEIR. Many of these minor modifications pertain to mitigation language – see criterion #3 below. Please also refer to Chapter 3 for a review of those changes.

[1] The *Nevada County Transportation Commission Senate Bill 743 Final Vehicle Miles Traveled Implementation Report* (SB743 Report), 2020.

In summary, recirculation of the EIR is not required pursuant to criterion 1 of 15088.5, because no new significant environmental impact will result from the Project or its mitigation measures.

2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

This criterion pertains to whether the Final EIR provides significant new information showing that a substantial increase in the severity of an environmental impact already identified in the DEIR would occur unless mitigation measures are adopted that reduce the impact to a level of insignificance. Nothing in the responses to comments, nor in the changes to the DEIR text shown in Chapter 3 of this Final EIR, results in a substantial increase in the severity of a significant environmental impact identified in the DEIR. Recirculation of the EIR is not required under this criterion.

3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

As shown in Chapter 3 of this Final EIR, as a result of public comment, several minor modifications are made to mitigation measures included in the DEIR. Under *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1993) 6 C4th 1112 (*Laurel Heights II*) and 15088.5(a)(3), when information added to the Final EIR consists of a suggested new project alternative or mitigation measure, recirculation is only required if the new alternative or mitigation measure meets all of the following criteria:[2]

- It is feasible;
- It is considerably different from the alternatives or mitigation measures already evaluated in the Draft EIR;
- It would clearly lessen the project's significant environmental impacts; and
- It is not adopted.

Recirculation is only required if *each* of the above tests is met.

In all cases where this Final EIR makes modifications to mitigation measures included in the DEIR, the updated mitigation measures are feasible and the applicant has agreed to implement the updated mitigation measures. No new mitigation measures are identified in this Final EIR, only revised mitigation measures that are not considerably different from the mitigation measure language already included in the DEIR. Thus, this criterion is not triggered by the minor modifications to mitigation measures and recirculation of the EIR is not required.

With respect to the portion of the comment pertaining to alternatives, several commenters suggested one or more additional alternatives for the County to consider. As discussed in this Final EIR, Section 6 of the DEIR considered project alternatives. As summarized in DEIR

[2] Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act, Second Edition, March 2022 Update, Volume 2*. March 2022, pg. 16-21.

Section 6.2, and provided in CEQA Guidelines Section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. This Final EIR demonstrates how the alternatives proposed by the commenters are either not considerably different from others previously analyzed in that they are not anticipated to eliminate any of the significant impacts of the Project, and/or they are not feasible. Thus, this criterion is not triggered and recirculation of the EIR is not required.

4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

According to Kostka and Zischke, this test for recirculation is based on the type of wholesale omission of information found in *Mountain Lion Coalition v. Fish & Game Comm'n*, in which the Draft EIR omitted any analysis of cumulative impacts, and a detailed analysis was first provided in the final EIR.[3] The record clearly demonstrates that no such wholesale omissions have occurred with the Idaho-Maryland Mine DEIR.

1.5 LIST OF COMMENTERS

Nevada County received 12 comment letters from agencies, 32 letters from groups, and 2,821 individual comment letters during the public comment period on the DEIR for the proposed project. In addition, verbal comments were received at the Special Public Meeting, and six comment letters were received after the close of the public comment period. For efficiency and clarity, the comment letters have been organized into 10 distinct categories: Agency Letters; Group Letters; Form Letter A; Form Letter B; Form Letter C; Form Letter D; Support Cards; Individual Letters; Late Letters; and DEIR Meeting. Many of the comment letters received contained template language, and, thus, were categorized into groups of "Form Letters". Form Letters A and B contain a space for commenters to include their individualized comments; however, Form Letters C and D and the Support Cards contain the template language only. This Final EIR includes all comment letters received, including duplicate letters authored by the same individual(s), but sent to multiple recipients. Some agencies, groups, and/or individuals submitted multiple letters, and, as a result, their name appears multiple times in the tables below. The comment letters were authored by the following:

Agencies

Letter Number	Author(s)		Agency
	First Name	Last Name	
Agency 1	Daniel	Lubin	California Department of Parks and Recreation
Agency 2	Kevin	Yount	California Department of Transportation

[3] Stephen L. Kostka and Michael H. Zischke, *Practice Under the California Environmental Quality Act,* pg. 16-22.

Agency 3	Shaundra	Cashdollar	California Department of Fish and Wildlife
Agency 4	Greg	Hendricks	Central Valley Regional Water Quality Control Board
Agency 5	Jeff	Huggins	Central Valley Regional Water Quality Control Board
Agency 6	G.	Steffenson	Department of California Highway Patrol
Agency 7	Stacy	Weckesser	Department of Toxic Substances Control
Agency 8	Thomas	Last	Grass Valley Community Development Department
Agency 9	Bernard	Zimmerman	Nevada County Historical Landmarks Commission
Agency 10	Armon	Close	Nevada Irrigation District
Agency 11	Gretchen	Bennitt	Northern Sierra Air Quality Management District
Agency 12	Sam	Longmire	Northern Sierra Air Quality Management District

Groups

Letter Number	Author(s)		Group
	First Name	Last Name	
Group 1	Kristine	ZuaZua	Alliance For Workforce Development, Inc.
Group 2	Erin	Tarr	Bear Yuba Land Trust
Group 3	Mary	Hunter	BriarPatch Food Co-Op
Group 4	Joe	Ramey	Business Owners (multiple signatures)
Group 5	Jeanne	Wilson	California Native Plant Society - Redbud Chapter
Group 6	Ralph	Silberstein	Community Environmental Advocates Foundation
Group 7	Ralph	Silberstein	Community Environmental Advocates Foundation
Group 8	Ralph	Silberstein	Community Environmental Advocates Foundation
Group 9	David	Chambers	Center for Science in Public Participation
Group 10	Fred	Bell	First Church of Christ Scientist, Grass Valley
Group 11	Edward	Sylvester	Friends of Banner Mountain
Group 12	Edward	Sylvester	Friends of Banner Mountain
Group 13	Allison	Nelson	Gold Country Avian Studies
Group 14	Shelly	Covert	Nevada City Rancheria Nisenan Tribe
Group 15	Kathleen	Hinman	Nevada County Association of Realtors
Group 16	David	Whitehead	Nevada County Chapter of Citizens' Climate Lobby/Education (CCL)
Group 17	Donald	Rivenes	Nevada County Climate Action Now
Group 18	Eric	Robins	Nevada County Democratic Central Committee
Group 19	Miriam	Limov	Nevada County Food Policy Council Community Alliance with Family Farmers
Group 20	Jillian	Blanchard	Rudder Law Group, LLP
Group 21	Ellison	Folk	Shute Mihaly Law Firm/Community Environmental Advocates Foundation
Group 22	Donald	Rivenes	Sierra Foothills Audubon Society
Group 23	Barbara	Rivenes	Sierra Nevada Group of the Sierra Club
Group 24	Jeff	Lauder	Sierra Streams Institute
Group 25	Keiko	Mertz	South Yuba River Citizens League
Group 26	Carrie	Monohan	The Sierra Fund
Group 27	Unknown		The Wells Coalition
Group 28	Unknown		Wells Coalition
Group 29	Jonathan	Keehn	Wolf Creek Community Alliance
Group 30	Jonathan	Keehn	Wolf Creek Community Alliance
Group 31	Jonathan	Keehn	Wolf Creek Community Alliance
Group 32	Jonathan	Keehn	Wolf Creek Community Alliance

Form Letter A

Letter Number	Author(s)	
	First Name	Last Name
Form Letter A 1	Anastasia	Osling
Form Letter A 2	Anastasia	Osling
Form Letter A 3	Barbara	Brown
Form Letter A 4	Carleton	Forsman
Form Letter A 5	Carmen	Riley
Form Letter A 6	Carmen	Riley
Form Letter A 7	Carol	Hyndman
Form Letter A 8	Carol	Hyndman
Form Letter A 9	Carol	Kuczora
Form Letter A 10	Carol	Kuczora
Form Letter A 11	Carolyn	Battaini
Form Letter A 12	Cheryl	Morris
Form Letter A 13	Cheryl	Morris
Form Letter A 14	Constance	Wright
Form Letter A 15	Constance	Wright
Form Letter A 16	Gwen	Eymann
Form Letter A 17	Gwen	Eymann
Form Letter A 18	Janet	Dunstan
Form Letter A 19	Jennifer	Dewey
Form Letter A 20	Jennifer	Dewey
Form Letter A 21	Jesse	Wilson
Form Letter A 22	Joel	Houtman
Form Letter A 23	Joel	Houtman
Form Letter A 24	Mary	Pickett
Form Letter A 25	Melissa	Ridsway
Form Letter A 26	Melissa	Ridsway
Form Letter A 27	Paul	Elins
Form Letter A 28	Ruth	Edwards
Form Letter A 29	Ruth	Edwards
Form Letter A 30	Steven	Battaini
Form Letter A 31	Steven	Temple
Form Letter A 32	Steven	Temple
Form Letter A 33	Susan	Merrill
Form Letter A 34	Susan	Merrill
Form Letter A 35	Teresa	Freeman
Form Letter A 36	Theresa	Houtman
Form Letter A 37	Walter	Holtan
Form Letter A 38	Walter	Holtan
Form Letter A 39	William	Bault
Form Letter A 40	William	Bault

Form Letter B

Letter Number	Author(s)	
	First Name	Last Name
Form Letter B 1	Aaron	Corbiece
Form Letter B 2	Alan	James
Form Letter B 3	Alan	James

Form Letter B 4	Albert	Hernandez
Form Letter B 5	Alison	Osborn
Form Letter B 6	Alison	Osborn
Form Letter B 7	Amanda	Gahong
Form Letter B 8	Amanda	Gahong
Form Letter B 9	Amanda	Kenney
Form Letter B 10	Amanda	Kenney
Form Letter B 11	Amy	Edwards
Form Letter B 12	Amy	Edwards
Form Letter B 13	Amy	Patterson
Form Letter B 14	Amy	Patterson
Form Letter B 15	Andrea	Stout
Form Letter B 16	Andrea	Stout
Form Letter B 17	Anita	Wald-Tuttle
Form Letter B 18	Anita	Wald-Tuttle
Form Letter B 19	Ann	Emerson
Form Letter B 20	Anna	Frizzell
Form Letter B 21	Anna	Frizzell
Form Letter B 22	Anne	Adden
Form Letter B 23	Anne	Padget
Form Letter B 24	Annie	Speegle
Form Letter B 25	Annie	Speegle
Form Letter B 26	Ari	Hope
Form Letter B 27	Aselin	Neal
Form Letter B 28	Ashley	Berry
Form Letter B 29	Ashley	Berry
Form Letter B 30	Barbara	Brown
Form Letter B 31	Barry	Wasserman
Form Letter B 32	Barry	Wasserman
Form Letter B 33	Bettejean	Spatafore
Form Letter B 34	Bill	Lawrence
Form Letter B 35	Brittany	Roussel
Form Letter B 36	Brock	Grininger
Form Letter B 37	Bruce	McVicker
Form Letter B 38	C. Greg	Chapman
Form Letter B 39	C. Greg	Chapman
Form Letter B 40	Carleton	Forsman
Form Letter B 41	Carleton	Forsman
Form Letter B 42	Carleton	Forsman
Form Letter B 43	Carol	Zappelli
Form Letter B 44	Carol	Zappelli
Form Letter B 45	Carole	McCammon
Form Letter B 46	Carole	McCammon
Form Letter B 47	Carolee	Weisberg
Form Letter B 48	Caroline	McKnight
Form Letter B 49	Carrie	Zoll
Form Letter B 50	Charles	Chisholm
Form Letter B 51	Charles	Chisholm
Form Letter B 52	Charles	Lindquist
Form Letter B 53	Charles	Lindquist
Form Letter B 54	Charles	Schmidt
Form Letter B 55	Chris	Schneider

Form Letter B 56	Chris	Schneider
Form Letter B 57	Christie	Harris
Form Letter B 58	Christie	Harris
Form Letter B 59	Christina	Sabin
Form Letter B 60	Christina	Sabin
Form Letter B 61	Christine	Feodorov
Form Letter B 62	Cindy	Foxfoot
Form Letter B 63	Cindy	Foxfoot
Form Letter B 64	Courtney	Andes-McCullough
Form Letter B 65	Courtney	Andes-McCullough
Form Letter B 66	Craig	Weaver
Form Letter B 67	Cynthia	Bailey
Form Letter B 68	Cynthia	Koch
Form Letter B 69	David	Lindsey
Form Letter B 70	Deanna	Bloom
Form Letter B 71	Deanna	Bloom
Form Letter B 72	Deanna	Ronningen
Form Letter B 73	Deborah	Bridges
Form Letter B 74	Deborah	Bridges
Form Letter B 75	Denis	Hill
Form Letter B 76	Denise	Martin
Form Letter B 77	Denise	Martin
Form Letter B 78	Dennis	Geare
Form Letter B 79	Dominica	Mottarella
Form Letter B 80	Donna	Burke
Form Letter B 81	Donna	Burke
Form Letter B 82	Dorothy	Stone
Form Letter B 83	Dorothy	Stone
Form Letter B 84	Douglas	Nore
Form Letter B 85	Eileen	Blodgett
Form Letter B 86	Eileen	Blodgett
Form Letter B 87	Eileen	Hale
Form Letter B 88	Elizabeth	McGuire
Form Letter B 89	Elizabeth	McGuire
Form Letter B 90	Francesca	Erickson
Form Letter B 91	Francesca	Erickson
Form Letter B 92	Francis	Murphy
Form Letter B 93	Fred Vickie	Slikker Tobey
Form Letter B 94	Gabrielle	Neal
Form Letter B 95	Gary	Kisor
Form Letter B 96	Gary	Kisor
Form Letter B 97	Gayle	Costanza
Form Letter B 98	Geoff	Erwin
Form Letter B 99	Geoff	Pollard
Form Letter B 100	George	Dunstan
Form Letter B 101	George	Dunstan
Form Letter B 102	Gillian	Blair
Form Letter B 103	Gillian	Blair
Form Letter B 104	Gordon Marika	Keller Keller

Form Letter B 105	Gordon Marika	Keller Keller
Form Letter B 106	Gregory	Clary
Form Letter B 107	Gwendolyn	Fissel
Form Letter B 108	Hazel	Yates
Form Letter B 109	Hazel	Yates
Form Letter B 110	Henry	Goodman
Form Letter B 111	Henry	Goodman
Form Letter B 112	Henry	Goodman
Form Letter B 113	Iliana	Abrell
Form Letter B 114	Iliana	Abrell
Form Letter B 115	Ingegerd	Hjord
Form Letter B 116	Ingegerd	Hjord
Form Letter B 117	J. Anne	Lyon
Form Letter B 118	J.E.	Wilkinson
Form Letter B 119	Jacque	Bromm
Form Letter B 120	Jacque	Bromm
Form Letter B 121	James	Knott
Form Letter B 122	James	Knott
Form Letter B 123	Janet	Acklam
Form Letter B 124	Janet	Acklam
Form Letter B 125	Janet	Acklam
Form Letter B 126	Janet	Acklam
Form Letter B 127	Janet	Acklam
Form Letter B 128	Janet	Acklam
Form Letter B 129	Janet	Clogett
Form Letter B 130	Janet	Moore
Form Letter B 131	Janet	Weaver
Form Letter B 132	Janice	LuBenbill
Form Letter B 133	Janice	LuBenbill
Form Letter B 134	Janis	Clayett
Form Letter B 135	Jean	Velikonia
Form Letter B 136	Jeanne	Palmer
Form Letter B 137	Jeanne	Palmer
Form Letter B 138	Jeffery	Adams
Form Letter B 139	Jennifer	Martineau
Form Letter B 140	Jennifer	McCarthy
Form Letter B 141	Jennifer	McCarthy
Form Letter B 142	Jesmine	Reymond
Form Letter B 143	Jesmine	Reymond
Form Letter B 144	Jesper	
Form Letter B 145	Jesse	Grimes
Form Letter B 146	Jesse	Wilson
Form Letter B 147	Jessica	Kilroy
Form Letter B 148	Jessica	Kilroy
Form Letter B 149	Joan	Alderdice
Form Letter B 150	Joan	Stedden
Form Letter B 151	Joan	Stedden
Form Letter B 152	Joanne	Norton
Form Letter B 153	Joanne	Norton
Form Letter B 154	John	Burnside
Form Letter B 155	John	Burnside

Form Letter B 156	John	McKnight
Form Letter B 157	Joseph	Bonomolo
Form Letter B 158	Judie	Tartaglia
Form Letter B 159	Judie	Tartaglia
Form Letter B 160	Judy	McVicker
Form Letter B 161	Jules	Tortolani
Form Letter B 162	Karen	Donaldson
Form Letter B 163	Karen	Donaldson
Form Letter B 164	Karuna	Holm
Form Letter B 165	Karuna	Holm
Form Letter B 166	Kate	Dwyer
Form Letter B 167	Kate	Dwyer
Form Letter B 168	Kathleen	Boyer
Form Letter B 169	Kathleen	Lombardi
Form Letter B 170	Kathleen	Lombardi
Form Letter B 171	Kathryn	Gerwig
Form Letter B 172	Kathryn	Gerwig
Form Letter B 173	Kathryn	Kemp
Form Letter B 174	Kathy	Askins
Form Letter B 175	Kathy	Doty
Form Letter B 176	Kathy	Triolo
Form Letter B 177	Keith	Johnson
Form Letter B 178	Keith	Porter
Form Letter B 179	Keith	Ronningen
Form Letter B 180	Kent	Rose
Form Letter B 181	Kevel	Gutman
Form Letter B 182	Kevel	Gutman
Form Letter B 183	Kim	Miller
Form Letter B 184	Laura	Gaglass
Form Letter B 185	Laura	Harter
Form Letter B 186	Laura	Harter
Form Letter B 187	Laura	Montgomery
Form Letter B 188	Laura	Montgomery
Form Letter B 189	Leila	Barber
Form Letter B 190	Leila	Barber
Form Letter B 191	Leila	Barber
Form Letter B 192	Lennie	Blum
Form Letter B 193	Lennie	Blum
Form Letter B 194	Leslie	Kerns
Form Letter B 195	Linda	Ewald
Form Letter B 196	Linda	Ewald
Form Letter B 197	Lindsay	Dunckel
Form Letter B 198	Lisa	Haden
Form Letter B 199	Lisa	Haden
Form Letter B 200	Logan	McKnight
Form Letter B 201	Logan	McKnight
Form Letter B 202	Lori	Jung
Form Letter B 203	Louie	Croce
Form Letter B 204	Louie	Croce
Form Letter B 205	Louie	Croce
Form Letter B 206	Lynda	Guthrie
Form Letter B 207	Lynda	Guthrie

Form Letter B 208	Lynette	Smith-James
Form Letter B 209	Lynette	Smith-James
Form Letter B 210	M.T.	Albano
Form Letter B 211	M.T.	Albano
Form Letter B 212	Madeleine	Dowd
Form Letter B 213	Madeleine	Dowd
Form Letter B 214	Madeleine	Kemp
Form Letter B 215	Marianne	Roche
Form Letter B 216	Mark	Gierok
Form Letter B 217	Mark	Gierok
Form Letter B 218	Mark	Reilly
Form Letter B 219	Mark	Reilly
Form Letter B 220	Mark	Triolo
Form Letter B 221	Mark	Warner
Form Letter B 222	Marlee	Chamberlin
Form Letter B 223	Marlee	Chamberlin
Form Letter B 224	Martin	Lombardi
Form Letter B 225	Martin	Lombardi
Form Letter B 226	Mary	Pickett
Form Letter B 227	Mary	Pickett
Form Letter B 228	Mary	Pickett
Form Letter B 229	Melissa	Shepard
Form Letter B 230	Meredith	Manning
Form Letter B 231	Mert	Austin
Form Letter B 232	Mert	Austin
Form Letter B 233	Micah	Pierce
Form Letter B 234	Michael	Baker
Form Letter B 235	Michael	Baker
Form Letter B 236	Michael	Barber
Form Letter B 237	Michael	Barber
Form Letter B 238	Michael	Barber
Form Letter B 239	Mike	Stolla
Form Letter B 240	Mike	Stolla
Form Letter B 241	Mike	Weaver
Form Letter B 242	Mildred	Seedman
Form Letter B 243	Mindy	Oberne
Form Letter B 244	Mindy	Oberne
Form Letter B 245	Munson	Dowd
Form Letter B 246	Munson	Dowd
Form Letter B 247	Nancy	Jacobsen
Form Letter B 248	Nancy	Jacobsen
Form Letter B 249	Nancy	Miller
Form Letter B 250	Natalie	Weaver
Form Letter B 251	Natina	Pistone
Form Letter B 252	Nicole	Florez
Form Letter B 253	Nicole	Florez
Form Letter B 254	Nicolette	Ronningen
Form Letter B 255	Norman	Ely
Form Letter B 256	Olivia	Ronningen
Form Letter B 257	Pam	Kisor
Form Letter B 258	Pamela	Jung
Form Letter B 259	Pamela	Jung

Form Letter B 260	Patricia	Gillings
Form Letter B 261	Paul	Berger
Form Letter B 262	Pauline	Marie
Form Letter B 263	Pauline	Marie
Form Letter B 264	Peter	Alsina
Form Letter B 265	Peter	Alsina
Form Letter B 266	Prairie	Bauman
Form Letter B 267	Rachel	McCullough
Form Letter B 268	Randi	Pratini
Form Letter B 269	Rhonda	Young
Form Letter B 270	Rhonda	Young
Form Letter B 271	Richard	Callan
Form Letter B 272	Rob	Katzenstein
Form Letter B 273	Robert	Erickson
Form Letter B 274	Robert	Erickson
Form Letter B 275	Robert	Trent
Form Letter B 276	Roberta	Hue
Form Letter B 277	Robin	Hart
Form Letter B 278	Robin	Hart
Form Letter B 279	Ross	McKnight
Form Letter B 280	Ruth	Ghio
Form Letter B 281	Ruth	Ghio
Form Letter B 282	Ruth	Jones
Form Letter B 283	Ruth	Jones
Form Letter B 284	Sandra	Burke
Form Letter B 285	Sandra	Yanko
Form Letter B 286	Sandra	Yanko
Form Letter B 287	Sandy	Pack
Form Letter B 288	Sandy	Pack
Form Letter B 289	Sequoia	Haughey
Form Letter B 290	Sequoia	Haughey
Form Letter B 291	Shana	Maziarz
Form Letter B 292	Shana	Maziarz
Form Letter B 293	Sheila	Baker
Form Letter B 294	Sheila	Baker
Form Letter B 295	Sheila	Baker
Form Letter B 296	Sheila	Baker
Form Letter B 297	Sheila	Baker
Form Letter B 298	Shirley	Fenicle
Form Letter B 299	Shirley	Fenicle
Form Letter B 300	Shirley	Osgood
Form Letter B 301	Shirley	Osgood
Form Letter B 302	Shirley	Porter
Form Letter B 303	Solomon	Bassoff
Form Letter B 304	Spencer	Wingfield
Form Letter B 305	Spencer	Wingfield
Form Letter B 306	Star	Carroll
Form Letter B 307	Sue	Cutuli
Form Letter B 308	Sue	Cutuli
Form Letter B 309	Susan	Hart
Form Letter B 310	Susan	Joanne
Form Letter B 311	Susan	Joanne

Form Letter B 312	Susan	Joanne
Form Letter B 313	Susan	Joanne
Form Letter B 314	Susan	Sanford
Form Letter B 315	Susan	Sanford
Form Letter B 316	Suzanne	Marriott
Form Letter B 317	Suzanne	Marriott
Form Letter B 318	Tamara	Zuromskis
Form Letter B 319	Tamara	Zuromskis
Form Letter B 320	Tara	Kelly
Form Letter B 321	Tara	Kelly
Form Letter B 322	Teena	Wagner
Form Letter B 323	Teresa	Freeman
Form Letter B 324	Tessie	Moore
Form Letter B 325	Theresa	Houtman
Form Letter B 326	Thomas	Dyer
Form Letter B 327	Thomas	Schreiner
Form Letter B 328	Thomas	Schreiner
Form Letter B 329	Ursula	Flint
Form Letter B 330	Ursula	Flint
Form Letter B 331	Vickie Fred	Tobey Slikkee
Form Letter B 332	Virginia	Knott
Form Letter B 333	Virginia	Knott
Form Letter B 334	Virginia	Knott
Form Letter B 335	Walt	Froloff
Form Letter B 336	Walt	Froloff
Form Letter B 337	William	Albin
Form Letter B 338	William	Bulley
Form Letter B 339	William	Gully
Form Letter B 340	William	Packard
Form Letter B 341	William	Packard
Form Letter B 342	Willow	Heir
Form Letter B 343	Wolfgang	Jung
Form Letter B 344	Wolfgang	Jung

Form Letter C

Letter Number	Author(s)	
	First Name	Last Name
Form Letter C 1	Alan	Dunn
Form Letter C 2	Alan	Dunn
Form Letter C 3	Amie	Cantu
Form Letter C 4	Amie	Cantu
Form Letter C 5	Amie	Cantu
Form Letter C 6	Austin	Gee
Form Letter C 7	Austin	Gee
Form Letter C 8	Benjamin	Mossman
Form Letter C 9	Bob	Norman
Form Letter C 10	Bob	Norman
Form Letter C 11	Bob	Norman
Form Letter C 12	Bob	Treadwell
Form Letter C 13	Bob	Treadwell

Form Letter C 14	Bob	Treadwell
Form Letter C 15	Brandon	Wilkins
Form Letter C 16	Brandon	Wilkins
Form Letter C 17	Brian	Guthrie
Form Letter C 18	Brian	Guthrie
Form Letter C 19	Brian	Guthrie
Form Letter C 20	Caleb	Carpenter
Form Letter C 21	Caleb	Carpenter
Form Letter C 22	Caleb	Carpenter
Form Letter C 23	Carl	Todd
Form Letter C 24	Carl	Todd
Form Letter C 25	Carl	Todd
Form Letter C 26	Carmen	Mateo
Form Letter C 27	Carmen	Mateo
Form Letter C 28	Carmen	Mateo
Form Letter C 29	Carolyn	Voss
Form Letter C 30	Carolyn	Voss
Form Letter C 31	Carolyn	Voss
Form Letter C 32	Cathleen	Yaksic
Form Letter C 33	Cathleen	Yaksic
Form Letter C 34	Cathleen	Yaksic
Form Letter C 35	Charleen	Martin
Form Letter C 36	Charleen	Martin
Form Letter C 37	Charles	Vold
Form Letter C 38	Charles	Vold
Form Letter C 39	Charles	Vold
Form Letter C 40	Chris	Frank
Form Letter C 41	Chris	Frank
Form Letter C 42	Chris	Frank
Form Letter C 43	Chris	Miller
Form Letter C 44	Chris	Miller
Form Letter C 45	Chris	Miller
Form Letter C 46	Christopher	Reilly
Form Letter C 47	Christopher	Reilly
Form Letter C 48	Christopher	Reilly
Form Letter C 49	Chuck	Treadwell
Form Letter C 50	Chuck	Treadwell
Form Letter C 51	Cindi	Anderson
Form Letter C 52	Cindi	Anderson
Form Letter C 53	Clark	Pearson
Form Letter C 54	Clark	Pearson
Form Letter C 55	Clark	Pearson
Form Letter C 56	Clyde	King
Form Letter C 57	Clyde	King
Form Letter C 58	Clyde	King
Form Letter C 59	Dale	Bohnenberger
Form Letter C 60	Dale	Bohnenberger
Form Letter C 61	Dale	Bohnenberger
Form Letter C 62	Dale	Hafelfinger
Form Letter C 63	Dale	Hafelfinger
Form Letter C 64	Dale	Hafelfinger
Form Letter C 65	Daniel	Danckert

Form Letter C 66	Daniel	Danckert
Form Letter C 67	Darla	Draper
Form Letter C 68	Darla	Draper
Form Letter C 69	Darla	Draper
Form Letter C 70	Darla	Draper
Form Letter C 71	Darla	Draper
Form Letter C 72	Darla	Draper
Form Letter C 73	Darryl	Snow
Form Letter C 74	Darryl	Snow
Form Letter C 75	Darryl	Snow
Form Letter C 76	Dawn	Fredricks
Form Letter C 77	Dawn	Fredricks
Form Letter C 78	Dennis	Wessels
Form Letter C 79	Dennis	Wessels
Form Letter C 80	Dennis	Wessels
Form Letter C 81	Donna	Clark-Salmonson
Form Letter C 82	Donna	Clark-Salmonson
Form Letter C 83	Donna	Clark-Salmonson
Form Letter C 84	Donna	Treadwell
Form Letter C 85	Donna	Treadwell
Form Letter C 86	Donna	Treadwell
Form Letter C 87	Douglas	Miller
Form Letter C 88	Douglas	Miller
Form Letter C 89	Douglas	Miller
Form Letter C 90	Douglas	Miller
Form Letter C 91	Douglas	Miller
Form Letter C 92	Douglas	Miller
Form Letter C 93	Earnie	Smith
Form Letter C 94	Earnie	Smith
Form Letter C 95	Earnie	Smith
Form Letter C 96	Edward	Strange
Form Letter C 97	Edward	Strange
Form Letter C 98	Edward	Strange
Form Letter C 99	Elvis	Cantu
Form Letter C 100	Elvis	Cantu
Form Letter C 101	Elvis	Cantu
Form Letter C 102	Elvis	Cantu
Form Letter C 103	Elvis	Cantu
Form Letter C 104	Elvis	Cantu
Form Letter C 105	Emily	Forman
Form Letter C 106	Emily	Forman
Form Letter C 107	Emily	Forman
Form Letter C 108	Erin	Beatie
Form Letter C 109	Erin	Beatie
Form Letter C 110	Erin	Beatie
Form Letter C 111	Erin	Dunne
Form Letter C 112	Erin	Dunne
Form Letter C 113	Erin	Dunne
Form Letter C 114	Erin	Dunne
Form Letter C 115	Fredrick	Myers
Form Letter C 116	Fredrick	Myers
Form Letter C 117	Fredrick	Myers

Form Letter C 118	Gary	Benedict
Form Letter C 119	Gary	Benedict
Form Letter C 120	Gary	Benedict
Form Letter C 121	Gene	Adams
Form Letter C 122	Gene	Adams
Form Letter C 123	Gene	Adams
Form Letter C 124	Gerald	Gierszewski
Form Letter C 125	Gerald	Gierszewski
Form Letter C 126	Gerald	Gierszewski
Form Letter C 127	Gerald	Gierszewski
Form Letter C 128	Gerald	Gierszewski
Form Letter C 129	Gerald	Gierszewski
Form Letter C 130	Grady	Wilson
Form Letter C 131	Grady	Wilson
Form Letter C 132	Grady	Wilson
Form Letter C 133	Greg	Schimke
Form Letter C 134	Greg	Schimke
Form Letter C 135	Harrison	Shrader
Form Letter C 136	Harrison	Shrader
Form Letter C 137	Herb	Miller
Form Letter C 138	Herb	Miller
Form Letter C 139	Herb	Miller
Form Letter C 140	Holly	Rose
Form Letter C 141	Holly	Rose
Form Letter C 142	Holly	Rose
Form Letter C 143	Holly	Rose
Form Letter C 144	Holly	Rose
Form Letter C 145	Hope	Rodriguez
Form Letter C 146	Hope	Rodriguez
Form Letter C 147	Hope	Rodriguez
Form Letter C 148	Jacob	Carcerano
Form Letter C 149	Jacob	Carcerano
Form Letter C 150	James	Geach
Form Letter C 151	James	Geach
Form Letter C 152	James	Geach
Form Letter C 153	James	Self
Form Letter C 154	James	Self
Form Letter C 155	James	Self
Form Letter C 156	Jan	Holmgren
Form Letter C 157	Jan	Holmgren
Form Letter C 158	Jarryd	Gonzales
Form Letter C 159	Jarryd	Gonzales
Form Letter C 160	Jason	Condon
Form Letter C 161	Jason	Condon
Form Letter C 162	Jedd	Caddy
Form Letter C 163	Jedd	Caddy
Form Letter C 164	Jedd	Caddy
Form Letter C 165	Jeffrey	Kyle
Form Letter C 166	Jeffrey	Kyle
Form Letter C 167	Jeffrey	Kyle
Form Letter C 168	Jim	Baku
Form Letter C 169	Jim	Baku

Form Letter C 170	Jim	Baku
Form Letter C 171	Jim	Schuessler
Form Letter C 172	Jim	Schuessler
Form Letter C 173	Joe	Bimmy
Form Letter C 174	Joe	Bimmy
Form Letter C 175	John	Brown
Form Letter C 176	John	Brown
Form Letter C 177	John	Brown
Form Letter C 178	John	Morton
Form Letter C 179	John	Morton
Form Letter C 180	John	Morton
Form Letter C 181	John	Eramouspe
Form Letter C 182	John	Eramouspe
Form Letter C 183	John	Eramouspe
Form Letter C 184	John	Morton
Form Letter C 185	John	Morton
Form Letter C 186	John	Morton
Form Letter C 187	John	Price
Form Letter C 188	John	Price
Form Letter C 189	John	Price
Form Letter C 190	Jon	Siptrott
Form Letter C 191	Jon	Siptrott
Form Letter C 192	Jordan	Kohler
Form Letter C 193	Jordan	Kohler
Form Letter C 194	Jordan	Kohler
Form Letter C 195	Joyce	Elsner
Form Letter C 196	Joyce	Elsner
Form Letter C 197	Kaitlynn	White
Form Letter C 198	Kaitlynn	White
Form Letter C 199	Kaitlynn	White
Form Letter C 200	Kenneth	Roberts
Form Letter C 201	Kenneth	Roberts
Form Letter C 202	Kevin	Halpin
Form Letter C 203	Kevin	Halpin
Form Letter C 204	Kevin	Halpin
Form Letter C 205	Kurt	Senkbeil
Form Letter C 206	Kurt	Senkbeil
Form Letter C 207	Kurt	Senkbeil
Form Letter C 208	Kurt	Senkbeil
Form Letter C 209	Kurt	Senkbeil
Form Letter C 210	Kurt	Senkbeil
Form Letter C 211	Kurt	Senkbeil
Form Letter C 212	Kurt	Senkbeil
Form Letter C 213	Kurt	Senkbeil
Form Letter C 214	Larry	Arzt
Form Letter C 215	Larry	Arzt
Form Letter C 216	Larry	Arzt
Form Letter C 217	Larry	Starn
Form Letter C 218	Larry	Starn
Form Letter C 219	Larry	Starn
Form Letter C 220	Larry	Starn
Form Letter C 221	Larry	Starn

Form Letter C 222	Laura	Preece
Form Letter C 223	Laura	Preece
Form Letter C 224	Laura	Preece
Form Letter C 225	Lee	Matthews
Form Letter C 226	Lee	Matthews
Form Letter C 227	Lee	Matthews
Form Letter C 228	Linda	Fuentes
Form Letter C 229	Linda	Fuentes
Form Letter C 230	Linda	Fuentes
Form Letter C 231	Lock	Richards
Form Letter C 232	Lock	Richards
Form Letter C 233	Lock	Richards
Form Letter C 234	Lynn	Haight
Form Letter C 235	Lynn	Haight
Form Letter C 236	Lynn	Haight
Form Letter C 237	Marc	Davis
Form Letter C 238	Marc	Davis
Form Letter C 239	Marc	Davis
Form Letter C 240	Marc	Davis
Form Letter C 241	Marc	Davis
Form Letter C 242	Marc	Davis
Form Letter C 243	Margaret	Harcourt
Form Letter C 244	Margaret	Harcourt
Form Letter C 245	Margaret	Harcourt
Form Letter C 246	Margaret	Harcourt
Form Letter C 247	Margaret	Harcourt
Form Letter C 248	Margaret	Harcourt
Form Letter C 249	Margaret	Urke
Form Letter C 250	Margaret	Urke
Form Letter C 251	Margaret	Harcourt
Form Letter C 252	Margaret	Harcourt
Form Letter C 253	Margaret	Harcourt
Form Letter C 254	Marie	Allen
Form Letter C 255	Marie	Allen
Form Letter C 256	Martha	Turner
Form Letter C 257	Martha	Turner
Form Letter C 258	Martha	Turner
Form Letter C 259	Matt	McDonald
Form Letter C 260	Matt	McDonald
Form Letter C 261	Matt	McDonald
Form Letter C 262	Matt	McDonald
Form Letter C 263	Michael	Norton
Form Letter C 264	Michael	Norton
Form Letter C 265	Michael	Pesonen
Form Letter C 266	Michael	Pesonen
Form Letter C 267	Michael	Pesonen
Form Letter C 268	Mike	Alcala
Form Letter C 269	Mike	Alcala
Form Letter C 270	Mike	Alcala
Form Letter C 271	Mike	Wade
Form Letter C 272	Mike	Wade
Form Letter C 273	Morgan	Juric



Form Letter C 274	Morgan	Juric
Form Letter C 275	Myles	Vickers
Form Letter C 276	Myles	Vickers
Form Letter C 277	Paul	Jordan
Form Letter C 278	Paul	Jordan
Form Letter C 279	Paul	Jordan
Form Letter C 280	Paul	Jordan
Form Letter C 281	Paul	Jordan
Form Letter C 282	Paul	Jordan
Form Letter C 283	Pearce	Boyer
Form Letter C 284	Pearce	Boyer
Form Letter C 285	Pearce	Boyer
Form Letter C 286	Pete	Perez
Form Letter C 287	Pete	Perez
Form Letter C 288	Philippe	Mickelson
Form Letter C 289	Philippe	Mickelson
Form Letter C 290	Ricardo	Fuentes
Form Letter C 291	Ricardo	Fuentes
Form Letter C 292	Ricardo	Fuentes
Form Letter C 293	Richard	Carter
Form Letter C 294	Richard	Carter
Form Letter C 295	Richard	Carter
Form Letter C 296	Richard	Kuhwarth
Form Letter C 297	Richard	Kuhwarth
Form Letter C 298	Richard	Kuhwarth
Form Letter C 299	Robert	Haight
Form Letter C 300	Robert	Haight
Form Letter C 301	Robert	Haight
Form Letter C 302	Robert	Ludwig
Form Letter C 303	Robert	Ludwig
Form Letter C 304	Robert	Seidlitz
Form Letter C 305	Robert	Seidlitz
Form Letter C 306	Robert	Seidlitz
Form Letter C 307	Robert	Seidlitz
Form Letter C 308	Robert	Seidlitz
Form Letter C 309	Robert	Seidlitz
Form Letter C 310	Ron	Kliewer
Form Letter C 311	Ron	Kliewer
Form Letter C 312	Ronald	Arndt
Form Letter C 313	Ronald	Arndt
Form Letter C 314	Ronald	Arndt
Form Letter C 315	Ronald	Arndt
Form Letter C 316	Ronald	Arndt
Form Letter C 317	Ronald	Arndt
Form Letter C 318	Russell	George
Form Letter C 319	Russell	George
Form Letter C 320	Russell	George
Form Letter C 321	Sadie	Potter
Form Letter C 322	Sadie	Potter
Form Letter C 323	Scott	Kimura
Form Letter C 324	Scott	Kimura
Form Letter C 325	Sharon	Delgado

Form Letter C 326	Sharon	Delgado
Form Letter C 327	Sharon	Delgado
Form Letter C 328	Sherri	Oakley
Form Letter C 329	Sherri	Oakley
Form Letter C 330	Sherri	Oakley
Form Letter C 331	Shirlyn	Vogel
Form Letter C 332	Shirlyn	Vogel
Form Letter C 333	Shirlyn	Vogel
Form Letter C 334	Steve	Barnes
Form Letter C 335	Steve	Barnes
Form Letter C 336	Steve	Murphy
Form Letter C 337	Steve	Murphy
Form Letter C 338	Steve	Murphy
Form Letter C 339	Steven	Borgnis
Form Letter C 340	Steven	Borgnis
Form Letter C 341	Steven	Borgnis
Form Letter C 342	Steven	Borgnis
Form Letter C 343	Steven	Borgnis
Form Letter C 344	Steven	Borgnis
Form Letter C 345	Steven	Borgnis
Form Letter C 346	Steven	Borgnis
Form Letter C 347	Steven	Borgnis
Form Letter C 348	Sunnie	Skiles
Form Letter C 349	Sunnie	Skiles
Form Letter C 350	Susan	Jueck
Form Letter C 351	Susan	Jueck
Form Letter C 352	Susan	Jueck
Form Letter C 353	Susan	Jueck
Form Letter C 354	Susan	Jueck
Form Letter C 355	Susan	Jueck
Form Letter C 356	Susan	Jueck
Form Letter C 357	Susan	Jueck
Form Letter C 358	Susan	Jueck
Form Letter C 359	Suzanne	King
Form Letter C 360	Suzanne	King
Form Letter C 361	Suzanne	King
Form Letter C 362	Tamar	Brinkman
Form Letter C 363	Tamar	Brinkman
Form Letter C 364	Tamar	Brinkman
Form Letter C 365	Test	Person
Form Letter C 366	Thomas	Kitchar
Form Letter C 367	Thomas	Kitchar
Form Letter C 368	Thomas	Amesbury
Form Letter C 369	Thomas	Amesbury
Form Letter C 370	Thomas	Amesbury
Form Letter C 371	Tim	McShane
Form Letter C 372	Tim	McShane
Form Letter C 373	Tim	McShane
Form Letter C 374	Tom	Andersen
Form Letter C 375	Tom	Andersen
Form Letter C 376	Tom	Andersen
Form Letter C 377	Tom	Jacobson



Form Letter C 378	Tom	Jacobson
Form Letter C 379	Tom	Jacobson
Form Letter C 380	Walter	Snook
Form Letter C 381	Walter	Snook
Form Letter C 382	Walter	Snook
Form Letter C 383	Wes	Hawkins
Form Letter C 384	Wes	Hawkins
Form Letter C 385	Wes	Hawkins
Form Letter C 386	William	Allsop
Form Letter C 387	William	Allsop
Form Letter C 388	William	Allsop
Form Letter C 389	Wilton	Fryer
Form Letter C 390	Wilton	Fryer
Form Letter C 391	Wilton	Fryer
Form Letter C 392	Wilton	Fryer
Form Letter C 393	Wilton	Fryer
Form Letter C 394	Wilton	Fryer

Form Letter D

Letter Number	Author(s)	
	First Name	Last Name
Form Letter D 1	Aldo	
Form Letter D 2	Alyssa	Rurup
Form Letter D 3	April	Dunham
Form Letter D 4	C.	Taylor
Form Letter D 5	Caroline	Corasaniti
Form Letter D 6	Colleen	Heater
Form Letter D 7	Corey	Vanderwould
Form Letter D 8	Dori	Greenbaum
Form Letter D 9	Julie	Kane
Form Letter D 10	Marion	Gillbert
Form Letter D 11	Susan	Hollon
Form Letter D 12	Thira	Gillbert
Form Letter D 13	Tiffany	Brunello
Form Letter D 14	Wrynne	Kohler

Support Cards

Letter Number	Author(s)	
	First Name	Last Name
Support Card 1	Aaron	Hill
Support Card 2	Aaron	Hill
Support Card 3	Aaron	McIntyre
Support Card 4	Abeli	
Support Card 5	Addison	Kramer
Support Card 6	Al	Mader
Support Card 7	Al	Reichmuth
Support Card 8	Alan	Corcoran
Support Card 9	Alan	Eagleton
Support Card 10	Albert	Nuijens
Support Card 11	Alexander	Eagle

Support Card 12	Alexander	Owens
Support Card 13	Alfred	Bulf
Support Card 14	Allen	Ramsey
Support Card 15	Alonna-Lynn	Alunbar
Support Card 16	Amos	Seghezzi
Support Card 17	Amos	Seghezzi
Support Card 18	Andre	Lubarsky
Support Card 19	Andrea	Harris
Support Card 20	Andrew	Hinz
Support Card 21	Andrew	Kuhnmuench
Support Card 22	Andrew	Kuhnmuench
Support Card 23	Andrew	Rust
Support Card 24	Andrew	Wilkinson
Support Card 25	Andy	Cassano
Support Card 26	Angus	Mackay
Support Card 27	Anna Marie	Mansfield
Support Card 28	Anthony	Domschot
Support Card 29	April	Pfeiler
Support Card 30	Arlene	Trevethick
Support Card 31	Arlene	Trevethick
Support Card 32	Arlene	Trevethick
Support Card 33	Arletha	Richardson
Support Card 34	Art	Mennick
Support Card 35	Artshade Construction	
Support Card 36	B.	Montoya
Support Card 37	B.	Wiederhold
Support Card 38	Bam Realty, LLC	
Support Card 39	Barbara	Hall
Support Card 40	Barbara	Kay
Support Card 41	Barbara	Kelley
Support Card 42	Barbara	Lauderdale
Support Card 43	Barbara	Lauderdale
Support Card 44	Barbara	Perry
Support Card 45	Barbara	Reamer
Support Card 46	Barbara	Schumacher
Support Card 47	Barry	Lowery
Support Card 48	Barry	Mingst
Support Card 49	Beau	Huiskens
Support Card 50	Beckey	Kidder
Support Card 51	Ben	Coleman
Support Card 52	Ben	Joiner
Support Card 53	Ben	Kaplan
Support Card 54	Ben	Coleman
Support Card 55	Ben	Kaplan
Support Card 56	Ben	Veblen
Support Card 57	Bernadette	Jaeger
Support Card 58	Bernice	Owczerzak
Support Card 59	Bethany	Denkers
Support Card 60	Betti	Taormina
Support Card 61	Bettie	Ferry
Support Card 62	Betty	Maddoy
Support Card 63	Beverly	Bologna

Support Card 64	Beverly	Schuetz
Support Card 65	Beverly	Sieler
Support Card 66	Beverly	Sieler
Support Card 67	Beverly	Stillwater
Support Card 68	Beverly	Suenram
Support Card 69	Bill	Bakker
Support Card 70	Bill	Brooks
Support Card 71	Bill	Case
Support Card 72	Bill	Chappel
Support Card 73	Bill	Lewis
Support Card 74	Bill	Lewis
Support Card 75	Bill	Maudru
Support Card 76	Bill	Murray
Support Card 77	Bill	Riske
Support Card 78	Bill	Riske
Support Card 79	Bill	Standley
Support Card 80	Bill	Riske
Support Card 81	Bo	Vaughan
Support Card 82	Bob	Corrigan
Support Card 83	Bob	Ortwein
Support Card 84	Bob	Treadwell
Support Card 85	Bob	Wilder
Support Card 86	Bob	Beams
Support Card 87	Bob	Carman
Support Card 88	Bob	Larive
Support Card 89	Bob	Personevi
Support Card 90	Bob	Swanson
Support Card 91	Bob	Treadwell
Support Card 92	Bob	Wilder
Support Card 93	Bob	Ybarrondo
Support Card 94	Bobbe	Pfau
Support Card 95	Brad	Sparks
Support Card 96	Bradley	Hertan
Support Card 97	Brady	Tanner
Support Card 98	Brandy	Morris
Support Card 99	Brenda	Gildea
Support Card 100	Brenda	Jensen
Support Card 101	Brenda	Jensen
Support Card 102	Brenda	Jensen
Support Card 103	Brent	Boling
Support Card 104	Brent	Jonas
Support Card 105	Brent	Oakley
Support Card 106	Bret	Dove
Support Card 107	Brian	Foster
Support Card 108	Brian	Foster
Support Card 109	Brian	Warrensford
Support Card 110	Bruce	McDonald
Support Card 111	Bruce	McDonald
Support Card 112	Bruce	Schmauder
Support Card 113	Bruce	Hunt
Support Card 114	Bruce	McDonald
Support Card 115	Bruce	Schmauder

Support Card 116	Bryan	Lopin
Support Card 117	Buzz	Presser
Support Card 118	Byron	Jones
Support Card 119	Byron	Maynard
Support Card 120	Cara	Clifton
Support Card 121	Carl	Barnes
Support Card 122	Carl	Barnes
Support Card 123	Carl	Todd
Support Card 124	Carl	Gordon
Support Card 125	Carla	Cipollne
Support Card 126	Carla	Gianquento
Support Card 127	Carmen	Browning
Support Card 128	Carol	Barrett
Support Card 129	Carol	Pureier
Support Card 130	Carolanne	Beren
Support Card 131	Carolyn	Parmley-Wyman
Support Card 132	Carolyn	Seyler
Support Card 133	Carrie	Highfall
Support Card 134	Casey	Chadwick
Support Card 135	Cathy	Runne
Support Card 136	Centero	Vasquez
Support Card 137	Chad	Bohman
Support Card 138	Chad	Graybill
Support Card 139	Chad	Graybill
Support Card 140	Chalmer	DeCecco
Support Card 141	Charleen	Nugent
Support Card 142	Charles	Babiarz
Support Card 143	Charles	Bardsley
Support Card 144	Charles	Erikson
Support Card 145	Charles	Nowell
Support Card 146	Charles	Nowell
Support Card 147	Charles	Rowe
Support Card 148	Charles	Rowe
Support Card 149	Charles	Smith
Support Card 150	Charles	Whittlesey
Support Card 151	Charles	Wilson
Support Card 152	Charles	Windsor
Support Card 153	Charles	Randall
Support Card 154	Cheryl	Goodrow
Support Card 155	Chris	Buti
Support Card 156	Chris	Friedman
Support Card 157	Chris	Hansen
Support Card 158	Chris	Harris
Support Card 159	Chris	Hofland
Support Card 160	Chris	Hughes
Support Card 161	Chris	Johnson
Support Card 162	Chris	McBride
Support Card 163	Chris	Torreyson
Support Card 164	Christi	Lamica
Support Card 165	Christina	Feise
Support Card 166	Christopher	Lewis
Support Card 167	Christopher	Phelan

Support Card 168	Christopher	Reilly
Support Card 169	Christopher	Reilly
Support Card 170	Chuck	Nowell
Support Card 171	Cindi	Anderson
Support Card 172	Cindi	Anderson
Support Card 173	Cindy	Anderson
Support Card 174	Cindy	Wong
Support Card 175	Clarence	Taylor
Support Card 176	Clark	Pearson
Support Card 177	Claudette	Granados
Support Card 178	Claudia	Bennett
Support Card 179	Cliff	Goodson
Support Card 180	Clint	Nallington
Support Card 181	Clyde	King
Support Card 182	Collin	Smith
Support Card 183	Constance	Huebner
Support Card 184	Craig	Comeaux
Support Card 185	Craig	Fox
Support Card 186	Craig	Garner
Support Card 187	Curtis	McMullan
Support Card 188	Curtis	McMullan
Support Card 189	Curtis	Price
Support Card 190	Cynthia	Pekarek
Support Card 191	D.L.	Bloche
Support Card 192	Dale	Bohnenberger
Support Card 193	Dale	Bolin
Support Card 194	Dale	Bolin
Support Card 195	Dale	Hafelfinger
Support Card 196	Dale	Hafelfinger
Support Card 197	Dan	Brokaw
Support Card 198	Dan	Demartini
Support Card 199	Dan	Driscol
Support Card 200	Dan	Fadling
Support Card 201	Dan	Mower
Support Card 202	Dan	Riffle
Support Card 203	Dan	Young
Support Card 204	Daniel	Burdekin
Support Card 205	Daniel	Danckert
Support Card 206	Daniel	DiPietro
Support Card 207	Daniel	Leidel
Support Card 208	Daniel	Reiswig
Support Card 209	Daniel	Siegle
Support Card 210	Danielle	White
Support Card 211	Danielle	White
Support Card 212	Dannie	Andrews
Support Card 213	Darrel	Edzards
Support Card 214	Darrel	Freude
Support Card 215	Darrell	Murphy
Support Card 216	Darryl	Stoner
Support Card 217	Daryl	Barth
Support Card 218	Dave	Frye
Support Card 219	Dave	Matson

Support Card 220	Dave	Matson
Support Card 221	Dave	Sivertsen
Support Card 222	Dave	Travis
Support Card 223	David	Bloche
Support Card 224	David	Casner
Support Card 225	David	Clayton
Support Card 226	David	Frazer
Support Card 227	David	Glubatch
Support Card 228	David	Higbee
Support Card 229	David	Landon
Support Card 230	David	Laurenzo
Support Card 231	David	Mapa
Support Card 232	David	Rice
Support Card 233	David	Saller
Support Card 234	David	Thompson
Support Card 235	David	Vertini
Support Card 236	David	Whatley
Support Card 237	David	Ashworth
Support Card 238	David	Dodd
Support Card 239	David	Hughes
Support Card 240	David	Kimmich
Support Card 241	David	Kimmich
Support Card 242	David	Koerver
Support Card 243	David	Kuttler
Support Card 244	David	Laurenzo
Support Card 245	David	Nelson
Support Card 246	David	Swift
Support Card 247	Dawna	Allen
Support Card 248	Dean	Blodgett
Support Card 249	Dean	Christensen
Support Card 250	Debbie	Dajas
Support Card 251	Debbie	Dajas
Support Card 252	Debbie	Ghiringhell
Support Card 253	Debbie	Ghiringhell
Support Card 254	Debora	Ghiringhell
Support Card 255	Deborah	Balmino-Graham
Support Card 256	Deborah	Brown
Support Card 257	Deborah	Burnett
Support Card 258	Deborah	Frank
Support Card 259	Deborah	Schepperle
Support Card 260	Del	Liverey
Support Card 261	Deloise	Sutton
Support Card 262	Deloise	Sutton
Support Card 263	Delulace	Rueppel
Support Card 264	Denise	Youngman
Support Card 265	Dennis	Chipchase
Support Card 266	Dennis	Cole
Support Card 267	Dennis	Elliott
Support Card 268	Dennis	Grube
Support Card 269	Dennis	Hanson
Support Card 270	Dennis	Kocher
Support Card 271	Dennis	Madsen



Support Card 272	Dennis	Madsen
Support Card 273	Dennis	Madsen
Support Card 274	Dennis	Sorrell
Support Card 275	Dennis	Wessels
Support Card 276	Dennis	Wessels
Support Card 277	Derek	Spangler
Support Card 278	Dian	Fischer
Support Card 279	Diana	Pruski
Support Card 280	Diana	Riley
Support Card 281	Diana	Riley
Support Card 282	Diane	Myers
Support Card 283	Diane	Rossi
Support Card 284	Diane	Rossi
Support Card 285	Diane	Richardson
Support Card 286	Dianna	Biococca
Support Card 287	Dirk	Meyer
Support Card 288	Don	Burrows
Support Card 289	Don	Daniels
Support Card 290	Don	Daniels
Support Card 291	Don	Foulk
Support Card 292	Don	Jones
Support Card 293	Don	Jones
Support Card 294	Don	Malcolm
Support Card 295	Don	Pettis
Support Card 296	Don	Swartz
Support Card 297	Donald	Bartoli
Support Card 298	Donald	Bartoli
Support Card 299	Donald	Hoffler
Support Card 300	Donald	McEdwards
Support Card 301	Donald	Williams
Support Card 302	Donald	Williams
Support Card 303	Donald	Wirta
Support Card 304	Donna	Imsand
Support Card 305	Donna	Salmonson
Support Card 306	Donna	Stewart
Support Card 307	Donna	Stewart
Support Card 308	Donna-Lynn	Dunbar
Support Card 309	Dora	Hermansen
Support Card 310	Doris	Penaluna
Support Card 311	Dorothy	Feloni
Support Card 312	Dorothy	Harding
Support Card 313	Doug	Dreher
Support Card 314	Doug	Miller
Support Card 315	Doug	Plumley
Support Card 316	Douglas	Leruchett
Support Card 317	Duane	Breiton
Support Card 318	Dwayne	Tomson
Support Card 319	Dwayne	Tomson
Support Card 320	Dwight	Johnson
Support Card 321	Dwight	Johnson
Support Card 322	Ed	Strange
Support Card 323	Ed	Townsend

Support Card 324	Edward	Quick
Support Card 325	Edward	Smith
Support Card 326	Edwardo	Valdevino
Support Card 327	Elinor	Mulloy
Support Card 328	Elise	Timoney
Support Card 329	Elizabeth	Price
Support Card 330	Elizabeth	Price
Support Card 331	Elton	Butler
Support Card 332	Environmental	Systems
Support Card 333	Eric	Dove
Support Card 334	Eric	Dove
Support Card 335	Eric	Leffingwell
Support Card 336	Eric	Daniels
Support Card 337	Eric	Dove
Support Card 338	Erik	Van Der Zalm
Support Card 339	Erik	Angle
Support Card 340	Ernie	Harries
Support Card 341	Ernie	Harries
Support Card 342	Ernylla	England
Support Card 343	Errol	McIntyre
Support Card 344	Estelle	LeMere
Support Card 345	Evelyn	McCallister
Support Card 346	F.E.	Mohr
Support Card 347	Frank	Barna
Support Card 348	Frank	Kulczyk
Support Card 349	Frank	Piner
Support Card 350	Frank	Rowe
Support Card 351	Frankie	Churchill
Support Card 352	Fred	Anderson
Support Card 353	G.	Mitchelmore
Support Card 354	G.P.	Combes
Support Card 355	Gabe	Alvarado
Support Card 356	Gail	Corondoni
Support Card 357	Garvin	Francis
Support Card 358	Gary	Benedict
Support Card 359	Gary	Benedict
Support Card 360	Gary	Benedict
Support Card 361	Gary	Berkheimer
Support Card 362	Gary	Franza
Support Card 363	Gary	Jones
Support Card 364	Gary	Sirois
Support Card 365	Gary	Smith
Support Card 366	Gayle	Hannan
Support Card 367	Gayle	Hannan
Support Card 368	Geoffrey	Gomer
Support Card 369	Georgann	Russell
Support Card 370	George	Beatty
Support Card 371	George	Kilner
Support Card 372	George	Kilner
Support Card 373	George	Kilner
Support Card 374	George	Loftus
Support Card 375	George	Loftus

Support Card 376	George	Matson
Support Card 377	George	Noud
Support Card 378	George	Sovey
Support Card 379	Gerald	Gierszewski
Support Card 380	Gerald	Satterfield
Support Card 381	Gerald	Swartz
Support Card 382	Gerard	Bushore
Support Card 383	Gerrad	Cichowicz
Support Card 384	Gerry	Anderson
Support Card 385	Gerry	Anderson
Support Card 386	Gina	Rogers
Support Card 387	Glen	Chileski
Support Card 388	Glen	Weisgerber
Support Card 389	Glen	Chileski
Support Card 390	Glendora	Andrews
Support Card 391	Glenn	Jones
Support Card 392	Glenn	Jones
Support Card 393	Glenn	Jones
Support Card 394	Glenn	Ward
Support Card 395	Glenn	Woodruff
Support Card 396	Gordon	Ghiglioine
Support Card 397	Gordon	Ghiglione
Support Card 398	Gordon	Ghiglione
Support Card 399	Gordon	Richey
Support Card 400	Grady	Wilson
Support Card 401	Greg	Frederking
Support Card 402	Greg	Gregory
Support Card 403	Greg	King
Support Card 404	Greg	Millar
Support Card 405	Greg	Osborne
Support Card 406	Greg	Mast
Support Card 407	Gregg	Manoogian
Support Card 408	Gregom	Pears
Support Card 409	Gregoni	Pesiri
Support Card 410	Gregory	Greg
Support Card 411	Gregory	Morgan
Support Card 412	Gretchen	Swinson
Support Card 413	Greydon	Hicks
Support Card 414	Gwena	McCarthy
Support Card 415	Hal	Lindval
Support Card 416	Harold	Anderson
Support Card 417	Hazel	Myers
Support Card 418	Heather	Houston
Support Card 419	Helen	Hansen
Support Card 420	Henry	Tardif
Support Card 421	Herb	Miller
Support Card 422	Herman	Pegoda
Support Card 423	Herman	Pegoda
Support Card 424	Hilton	Smith
Support Card 425	Hope	Justice
Support Card 426	Howard	Mordell
Support Card 427	Howard	Raikowski

Support Card 428	Howard	Simmons
Support Card 429	Howard	Freele
Support Card 430	H.P.	Vaughan
Support Card 431	H.P.	Vaughan
Support Card 432	Hugh	Tower
Support Card 433	Hugh	Tower
Support Card 434	Ila	Dunbar
Support Card 435	Ivan	Plascencia
Support Card 436	Ivia	Colon
Support Card 437	J.S.	Ellsworth
Support Card 438	Jack	Bishop
Support Card 439	Jack	Cramer
Support Card 440	Jack	Cramer
Support Card 441	Jack	Victor
Support Card 442	Jack	Bishop
Support Card 443	Jackie	Scholsser
Support Card 444	Jacqueline	Koch-Turner
Support Card 445	Jad	Funk
Support Card 446	Jaime	Recarens
Support Card 447	Jake	Dabis
Support Card 448	James	Barbour
Support Card 449	James	Barbour
Support Card 450	James	Butler
Support Card 451	James	Butler
Support Card 452	James	Butler
Support Card 453	James	Garmire
Support Card 454	James	Griffin
Support Card 455	James	Grill
Support Card 456	James	Haan
Support Card 457	James	Harrold
Support Card 458	James	Klauer
Support Card 459	James	Landsbush
Support Card 460	James	McCawn
Support Card 461	James	McKenzie
Support Card 462	James	Murray
Support Card 463	James	Quintal
Support Card 464	James	Sartori
Support Card 465	James	Self
Support Card 466	James	Slane
Support Card 467	James	Slane
Support Card 468	James	Soto
Support Card 469	James	Studabaker
Support Card 470	James	Sullivan
Support Card 471	James	Williams
Support Card 472	Jan	Hagel
Support Card 473	Janine	Priante
Support Card 474	Janis	Jones
Support Card 475	Janis	Jones
Support Card 476	Jared	Hicks
Support Card 477	Jason	Bice
Support Card 478	Jason	White
Support Card 479	Jean	Carli

Support Card 480	Jedd	Caddy
Support Card 481	Jedd	Caddy
Support Card 482	Jeff	Baranska
Support Card 483	Jeff	Biscotti
Support Card 484	Jeff	Freeman
Support Card 485	Jeff	Palm
Support Card 486	Jeff	Spencer
Support Card 487	Jeff	Thomsen
Support Card 488	Jeff	Wagner
Support Card 489	Jeff	Wagner
Support Card 490	Jeff	Zall
Support Card 491	Jeff Sue	
Support Card 492	Jeffery	Hunter
Support Card 493	Jeffery	Hunter
Support Card 494	Jennifer	Peterson
Support Card 495	Jenny	Crowell
Support Card 496	Jerel	Shapp
Support Card 497	Jeremiah	Crouse
Support Card 498	Jeremy	Deterding
Support Card 499	Jerrett	Davis
Support Card 500	Jerry	Cirino
Support Card 501	Jerry	Karnow
Support Card 502	Jerry	Karnow
Support Card 503	Jerry	Uhlig
Support Card 504	Jerry	Uhlig
Support Card 505	Jerry	Warmerdam
Support Card 506	Jerry	Short
Support Card 507	Jesse	Glenn
Support Card 508	Jesse	McKenna
Support Card 509	Jesse	White
Support Card 510	Jessica	Burlee
Support Card 511	Ji	Miller
Support Card 512	Jill	Muhlbach
Support Card 513	Jim	Baku
Support Card 514	Jim	Curry
Support Card 515	Jim	Curry
Support Card 516	Jim	Darnell
Support Card 517	Jim	Darnell
Support Card 518	Jim	Harrold
Support Card 519	Jim	Landsburg
Support Card 520	Jim	Myers
Support Card 521	Jim	Self
Support Card 522	Jim	Smith
Support Card 523	Jim	Wilson
Support Card 524	Jim	Geach
Support Card 525	Jo	DeSoto
Support Card 526	Joan	Brown
Support Card 527	Joan	Dahl
Support Card 528	Joan	Manud
Support Card 529	Joan	O'Donnell
Support Card 530	JoAnn	Baku

Support Card 531	Joann	McDermott
Support Card 532	Joanna	Fahey
Support Card 533	Joanne	Brown
Support Card 534	Joanne	Drumond
Support Card 535	Jodi	Davis
Support Card 536	Jodi	Steele
Support Card 537	Jodi	Steele
Support Card 538	Jody	Sweet
Support Card 539	Joe	Bonchonsky
Support Card 540	Joe	Fowler
Support Card 541	Joe	Fowler
Support Card 542	Joe	Glick
Support Card 543	Joe	Glick
Support Card 544	Joe	Glick
Support Card 545	Joe	Liggell
Support Card 546	Joe	Neidel
Support Card 547	Joe	Leidel
Support Card 548	John	Alspaugh
Support Card 549	John	Bain
Support Card 550	John	Bernice
Support Card 551	John	Butler
Support Card 552	John	Carter
Support Card 553	John	Clune
Support Card 554	John	Delgado
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Support Card 556	John	Drew
Support Card 557	John	Eagleton
Support Card 558	John	Eramouspe
Support Card 559	John	Eramouspe
Support Card 560	John	Fairchild
Support Card 561	John	Fotinos
Support Card 562	John	Godfrey
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Support Card 565	John	Morton
Support Card 566	John	Pekarek
Support Card 567	John	Philpot
Support Card 568	John	Reader
Support Card 569	John	Rice
Support Card 570	John	Sample
Support Card 571	John	Sanchez
Support Card 572	John	Schwabecher
Support Card 573	John	Tucker
Support Card 574	John	Wadden
Support Card 575	John	Young
Support Card 576	Jon	Constantin
Support Card 577	Jon	Grappi
Support Card 578	Jonathan	Ettlin
Support Card 579	Joseph	Anguiano
Support Card 580	Joseph	Anguiano
Support Card 581	Joseph	Anguiano
Support Card 582	Joseph	Aventheler

Support Card 583	Joseph	Bergeron
Support Card 584	Joseph	Gaeta
Support Card 585	Joseph	Seck
Support Card 586	Joseph	Woulfe
Support Card 587	Joseph	Woulfe
Support Card 588	Joshua	Hynie
Support Card 589	Joyce	Shillingburg
Support Card 590	Judith	Cole
Support Card 591	Judith	Cole
Support Card 592	Judith	Ellis
Support Card 593	Judith	McBride
Support Card 594	Judith	Parker
Support Card 595	Judy	Ellis
Support Card 596	Judy	Kistner
Support Card 597	Judy	Ten Eyer
Support Card 598	Juli	Reasor
Support Card 599	Julia	Amaral
Support Card 600	Julia	Amaral
Support Card 601	Julia	Amaral
Support Card 602	Justin	Krosi
Support Card 603	Justin	Simkins
Support Card 604	Justin	Smith
Support Card 605	K.E.	Dickey
Support Card 606	Kaeden	Tracy
Support Card 607	Kaeden	Tracy
Support Card 608	Kara	Liller
Support Card 609	Karen	Cromwell
Support Card 610	Karen	Kennedy
Support Card 611	Karen	Kinne
Support Card 612	Karen	Markulis
Support Card 613	Karen	Snapp
Support Card 614	Karl	Blanco
Support Card 615	Karl	Meyer
Support Card 616	Karl	Resett
Support Card 617	Katherine	Eyre
Support Card 618	Kathleen	Pimentel
Support Card 619	Kathleen	Vold
Support Card 620	Kathryn	Connolly
Support Card 621	Kathryn	Penk
Support Card 622	Kathryn	Penk
Support Card 623	Kathy	Montero
Support Card 624	Kathy	Palmer
Support Card 625	Kathy	Whittlesey
Support Card 626	Kathy	Whittlesey
Support Card 627	Kay	Swasey
Support Card 628	Keith	Atkins
Support Card 629	Keith	Cantrell
Support Card 630	Keith	Foran
Support Card 631	Kelly	Davis
Support Card 632	Kelly	Giacomini
Support Card 633	Kelly	Giacomini
Support Card 634	Kelly	Quinn

Support Card 635	Kelly	Sinclair
Support Card 636	Ken	Baker
Support Card 637	Ken	Bilderback
Support Card 638	Ken	Buck
Support Card 639	Ken	Draper
Support Card 640	Ken	Efird
Support Card 641	Ken	Efird
Support Card 642	Ken	Efird
Support Card 643	Ken	Harney
Support Card 644	Ken	Wenze
Support Card 645	Ken	Wyman
Support Card 646	Kenneth	Kemp
Support Card 647	Kenneth	Marti
Support Card 648	Kenneth	Roberts
Support Card 649	Kenneth	Wyman
Support Card 650	Kevin	Blowers
Support Card 651	Kevin	Brune
Support Card 652	Kevin	Cayer
Support Card 653	Kevin	Cookson
Support Card 654	Kevin	Heinisch
Support Card 655	Kevin	Jones
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Support Card 658	Kevin	Krikorian
Support Card 659	Kevin	Maxwell
Support Card 660	Kevin	McCarty
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Support Card 662	Kim	Herman
Support Card 663	Kim	Herman
Support Card 664	Kimber	Goodman
Support Card 665	Kimberly	Lovely
Support Card 666	Kindra	Nelson
Support Card 667	Kirby	DeLaunay
Support Card 668	Kirk	Senseney
Support Card 669	Kris	Stepanian
Support Card 670	Kua	Ortman
Support Card 671	Kubbah	Hoffman
Support Card 672	Kurt	Graversgaard
Support Card 673	Kurt	Meyer
Support Card 674	Kurt	Senkbeil
Support Card 675	Kurt	Scott
Support Card 676	Kyle	Corchero
Support Card 677	Kylene	Ellinwood
Support Card 678	L.	Richards
Support Card 679	L.J.	Will
Support Card 680	Lance	Pauly
Support Card 681	Larry	Ames
Support Card 682	Larry	Gross
Support Card 683	Larry	King
Support Card 684	Larry	Packard
Support Card 685	Larry	Packard
Support Card 686	Larry	Purciel

Support Card 687	Larry	Ryan
Support Card 688	Larry	Starn
Support Card 689	Larry	Stowe
Support Card 690	Larry	Youngman
Support Card 691	Larry	King
Support Card 692	Lars	Droivold
Support Card 693	Lars	Droivold
Support Card 694	Lars	Droivold
Support Card 695	Laura	Preece
Support Card 696	LaVonne	Ludian
Support Card 697	LaVonne	Ludian
Support Card 698	Lawrence	Beck
Support Card 699	Lawrence	Meyers
Support Card 700	Lee	Blakemore
Support Card 701	Lee	Matthews
Support Card 702	Lee	Tope
Support Card 703	Lee	Trumbull
Support Card 704	Les	Hickinbotham
Support Card 705	Les	Nicholson
Support Card 706	Leslie	DeVito
Support Card 707	Leslie	Jacob
Support Card 708	Liberty	Sunbear
Support Card 709	Linda	Couper
Support Card 710	Linda	Keck
Support Card 711	Linda	Montano
Support Card 712	Linda	Shulte
Support Card 713	Linda	Taylor
Support Card 714	Linda	Thode
Support Card 715	Lionel	Deboisblanc
Support Card 716	Lionel	DeBoisblanc
Support Card 717	Lisa	Milone
Support Card 718	Lori	Brady
Support Card 719	Lori	Dana
Support Card 720	Lori	Murphy
Support Card 721	Lori	Peters
Support Card 722	Lorraine	Plagge
Support Card 723	Lou	Janakos
Support Card 724	Lou	Linnet
Support Card 725	Lou	Freschi
Support Card 726	Louis	Balsamo
Support Card 727	Louis	Greenwood
Support Card 728	Louis	Greenwood
Support Card 729	Louise	Bradley
Support Card 730	Lucy	Garbraith
Support Card 731	Luisa	Varo
Support Card 732	Luke	Hale
Support Card 733	Lynn	Beck
Support Card 734	Lynn	Beck
Support Card 735	Lynn	Heyes
Support Card 736	Lynn	Zankich
Support Card 737	Lynn	Zankich
Support Card 738	M.	Andreasen

Support Card 739	M.	McEwen
Support Card 740	Madeline	Bartorillo
Support Card 741	Mandy	McLloyd
Support Card 742	Manfred	Weil
Support Card 743	Manuel	Recendez
Support Card 744	Marc	Davis
Support Card 745	Marc	Mikan
Support Card 746	Marcus	Adkison
Support Card 747	Margaret	Burlew
Support Card 748	Margaret	Burlew
Support Card 749	Margaret	Harcourt
Support Card 750	Margaret	Urke
Support Card 751	Maria	Auxiliadora
Support Card 752	Mariah	Romero
Support Card 753	Marie	Camaeda
Support Card 754	Marja	Miller
Support Card 755	Mark	Bauman
Support Card 756	Mark	Davis
Support Card 757	Mark	Di Salvo
Support Card 758	Mark	Gage
Support Card 759	Mark	Kendall
Support Card 760	Mark	Kiser
Support Card 761	Mark	Kubich
Support Card 762	Mark	Paye
Support Card 763	Mark	Robertson
Support Card 764	Mark	Stoutner
Support Card 765	Mark	Stoutner
Support Card 766	Mark	Strate
Support Card 767	Mark	Strate
Support Card 768	Mark	Strate
Support Card 769	Mark	Kubich
Support Card 770	Marlin	Houser
Support Card 771	Marlyn	Stark
Support Card 772	Marti	McBride
Support Card 773	Martin	Harvey
Support Card 774	Marvin	Rackley
Support Card 775	Marvir	Cook
Support Card 776	Mary	Pringle
Support Card 777	Mary	Belesut
Support Card 778	Maryalyce	Hansen
Support Card 779	Maryalyce	Hansen
Support Card 780	Matt	Bouchard
Support Card 781	Matt	Quentmeyer
Support Card 782	Matt	Johnson
Support Card 783	Matthew	Boman
Support Card 784	Matthew	Boman
Support Card 785	Matthew	Mitchell
Support Card 786	Melissa	Teague
Support Card 787	Melody	Raglin
Support Card 788	Michael	Glayson
Support Card 789	Michael	Gregersen
Support Card 790	Michael	Hooker

Support Card 791	Michael	Linn-Kidwell
Support Card 792	Michael	Linn-Kidwell
Support Card 793	Michael	Lyman
Support Card 794	Michael	McCauley
Support Card 795	Michael	Norton
Support Card 796	Michael	Ortola
Support Card 797	Michael	Ramirez
Support Card 798	Michael	Sabato
Support Card 799	Michael	Vasquez
Support Card 800	Michael	Wedel
Support Card 801	Michael	Williams
Support Card 802	Michelle	Jackson
Support Card 803	Michelle	LaValles
Support Card 804	Michelle	Wooster
Support Card 805	Mike	Leslie
Support Card 806	Mike	Leslie
Support Card 807	Mike	Neuer
Support Card 808	Mike	Pemberton
Support Card 809	Mike	Pemberton
Support Card 810	Mike	Peterson
Support Card 811	Mike	Wood
Support Card 812	Mike	Griffin
Support Card 813	Mitchell	Coffee
Support Card 814	Mitchell	Coffee
Support Card 815	Mitchell	Pendo
Support Card 816	Monica	Crain
Support Card 817	Morris	Anderson
Support Card 818	Mr.	Gibbons
Support Card 819	Myron	Putman
Support Card 820	Myron	Putman
Support Card 821	Myron	Putman
Support Card 822	Nancy	Hendrix
Support Card 823	Nancy	Leslie
Support Card 824	Nanette	Kalman
Support Card 825	Nathan	Glowniak
Support Card 826	Nathan	Hooker
Support Card 827	Nathan	Hooker
Support Card 828	Neil	Bolton
Support Card 829	Netha	Hill
Support Card 830	Nicholas	Breeze
Support Card 831	Nicholas	Fitting
Support Card 832	Nicholas	Pello
Support Card 833	Nicholas	Whittlesey
Support Card 834	Nick	Pello
Support Card 835	Norma	Buich
Support Card 836	Norman	Nielsen
Support Card 837	Norman	Nielson
Support Card 838	Norman	Winn
Support Card 839	Orta	Eckel
Support Card 840	Orta	Eckel
Support Card 841	Otto	Fischer
Support Card 842	Otto	Fischer

Support Card 843	Otto	Fischer
Support Card 844	Overton	Caperton
Support Card 845	P.	Pyle
Support Card 846	P.N.	Prichard
Support Card 847	Pam	White
Support Card 848	Pamela	Dallucki
Support Card 849	Pamela	Dobbas
Support Card 850	Pamela	Hayden
Support Card 851	Pamela	Pemberton
Support Card 852	Pamela	Ryan
Support Card 853	Pamela	Mardy
Support Card 854	Pat	Browning
Support Card 855	Pat	Davis
Support Card 856	Pat	Nelson
Support Card 857	Pat	Sutherland
Support Card 858	Pati	Costa
Support Card 859	Patricia	Anderson
Support Card 860	Patricia	Davis
Support Card 861	Patricia	Nattrass
Support Card 862	Patrick	Harding
Support Card 863	Patrick	Hauser
Support Card 864	Patrick	Schwartz
Support Card 865	Patrick	Schwartz
Support Card 866	Patrick	Sutherland
Support Card 867	Patsy	Boman
Support Card 868	Patti	Michael
Support Card 869	Patti	Unger
Support Card 870	Paul	Hollenbeck
Support Card 871	Paul	McClain
Support Card 872	Paul	McElroy
Support Card 873	Paul	Mosher
Support Card 874	Paul	Rankin
Support Card 875	Paul	Silva
Support Card 876	Paul	Speers
Support Card 877	Paul	Wilson
Support Card 878	Paul	Jordan
Support Card 879	Paul	Pekarek
Support Card 880	Paul	Thayer
Support Card 881	Paula	Lewis
Support Card 882	Pearce	Boyer
Support Card 883	Pedro	Perez
Support Card 884	Peggy	Griffin
Support Card 885	Percy	Dutrieux
Support Card 886	Perris	Hale
Support Card 887	Pete	Christensen
Support Card 888	Pete	Medrano
Support Card 889	Pete	Christensen
Support Card 890	Peter	Coussoulis
Support Card 891	Peter	Coussoulis
Support Card 892	Peter	Falk
Support Card 893	Peter	Gruber
Support Card 894	Peter	Gruber

Support Card 895	Peter	Snyder
Support Card 896	Petra	Juvinall
Support Card 897	Phil	Zink
Support Card 898	Philip	McCoy
Support Card 899	Philip	McCoy
Support Card 900	Phillip	Milam
Support Card 901	Phillip	Parker
Support Card 902	Priscilla	Vanderpas
Support Card 903	Quentin	Browne
Support Card 904	Rachael	Harvey
Support Card 905	Rachel	Weston
Support Card 906	Ralph	Morris
Support Card 907	Randolph	Lanzendorfer
Support Card 908	Randy	Freeman
Support Card 909	Randy	Smith
Support Card 910	Randy	Casto
Support Card 911	Randy	Nunnink
Support Card 912	Randy	Smith
Support Card 913	Raymond	Gedney
Support Card 914	Raymond	Knowle
Support Card 915	Raymond	Shepherd
Support Card 916	Rebecca	French
Support Card 917	Reed	Newcomb
Support Card 918	Rhett	Lewis
Support Card 919	Ricardo	Fuentes
Support Card 920	Rich	Fox
Support Card 921	Richard	Bucher
Support Card 922	Richard	Carter
Support Card 923	Richard	Cortez
Support Card 924	Richard	Deterding
Support Card 925	Richard	French
Support Card 926	Richard	Graydon
Support Card 927	Richard	Hansen
Support Card 928	Richard	Heather
Support Card 929	Richard	Kuhwarth
Support Card 930	Richard	Kuna
Support Card 931	Richard	Musa
Support Card 932	Richard	Okuma
Support Card 933	Richard	Preece
Support Card 934	Richard	Rodeck
Support Card 935	Richard	Rodeck
Support Card 936	Richard	Washburn
Support Card 937	Richard	Davis
Support Card 938	Richard	Terrell
Support Card 939	Rick	Lynn
Support Card 940	Ritadina	Arriaga
Support Card 941	Rob	Baldwin
Support Card 942	Rob	Beam
Support Card 943	Rob	Bosma
Support Card 944	Rob	Curry
Support Card 945	Rob	Penn
Support Card 946	Rob	Ullom

Support Card 947	Robert	Ash
Support Card 948	Robert	Chrisman
Support Card 949	Robert	Crouse
Support Card 950	Robert	Foster
Support Card 951	Robert	Free
Support Card 952	Robert	Haight
Support Card 953	Robert	Haight
Support Card 954	Robert	Hickins
Support Card 955	Robert	Hudspeth
Support Card 956	Robert	Ingram
Support Card 957	Robert	Johnson
Support Card 958	Robert	Kilroy
Support Card 959	Robert	Kilroy
Support Card 960	Robert	Kilroy
Support Card 961	Robert	Lang
Support Card 962	Robert	Lewis
Support Card 963	Robert	Lowenthal
Support Card 964	Robert	Lowenthal
Support Card 965	Robert	Matson
Support Card 966	Robert	McGee
Support Card 967	Robert	Mills
Support Card 968	Robert	Mills
Support Card 969	Robert	Mills
Support Card 970	Robert	Newkirk
Support Card 971	Robert	Parks
Support Card 972	Robert	Rist
Support Card 973	Robert	Seidlitz
Support Card 974	Robert	Shrader
Support Card 975	Robert	Tote
Support Card 976	Robert	Wilden
Support Card 977	Robert	Wilson
Support Card 978	Robert	Wilson
Support Card 979	Robert	Zoellin
Support Card 980	Robert	Birk
Support Card 981	Robert	Spencer
Support Card 982	Robin	Kitts
Support Card 983	Robin	Kitts
Support Card 984	Roger	Carmine
Support Card 985	Roger	Chapman
Support Card 986	Rolf	Ivey
Support Card 987	Romuald	Choron
Support Card 988	Ron	Foster
Support Card 989	Ron	Foster
Support Card 990	Ron	Henley
Support Card 991	Ron	Higgins
Support Card 992	Ron	Higgins
Support Card 993	Ron	Mewes
Support Card 994	Ron	Slay
Support Card 995	Ron	Slay
Support Card 996	Ron	Tuttle
Support Card 997	Ron	Weiser
Support Card 998	Ron	Mewes

Support Card 999	Ronald	Nevis
Support Card 1000	Ronald	Picken
Support Card 1001	Ronald	Skewes
Support Card 1002	Ronald	Skewes
Support Card 1003	Ronald	Buzzard
Support Card 1004	Ronnie	Thomas
Support Card 1005	Rosalyn	Johansen
Support Card 1006	Rosanne	Palmer
Support Card 1007	Rosemarie	Morris
Support Card 1008	Ross	Crary
Support Card 1009	Ross	Crary
Support Card 1010	Roxanna	Hill
Support Card 1011	Roy	Ramey
Support Card 1012	Russ	Broughan
Support Card 1013	Russ	Howell
Support Card 1014	Russel	Peterson
Support Card 1015	Russell	King
Support Card 1016	Russell	Lorang
Support Card 1017	Russell	Prinz
Support Card 1018	Russell	Williams
Support Card 1019	Ruth	Poulter
Support Card 1020	Ryan	Deniz
Support Card 1021	Ryan	Tidwell
Support Card 1022	Ryan	DeYoung
Support Card 1023	Ryan	Holmes
Support Card 1024	S.	Paulus
Support Card 1025	S.	Francone
Support Card 1026	Sally	Salivar
Support Card 1027	Sam	Griffith
Support Card 1028	Sam	Griffith
Support Card 1029	Sam	MacGregor
Support Card 1030	Sam	Marsico
Support Card 1031	Sam	Youngman
Support Card 1032	Samantha	Peebles
Support Card 1033	Samantha	Randall
Support Card 1034	Samuel	Phillips
Support Card 1035	Samuel	Youngman
Support Card 1036	Samuel	Youngman
Support Card 1037	Sandra	Collins
Support Card 1038	Sandra	Knapp
Support Card 1039	Sandra	Tishlarich
Support Card 1040	Sandra	Collins
Support Card 1041	Sandy	Hall
Support Card 1042	Sarah	Maslov
Support Card 1043	Scot	Little
Support Card 1044	Scot	Little
Support Card 1045	Scott	Landre
Support Card 1046	Sean	Bernard
Support Card 1047	Sean	Dolbee
Support Card 1048	Sean	Minor
Support Card 1049	Sean	O'Brien
Support Card 1050	Sean	Reynolds



Support Card 1051	Shaun	Kelly
Support Card 1052	Shawn	Bratcher
Support Card 1053	Shawn	Kobliska
Support Card 1054	Shawn	Oneill
Support Card 1055	Sheri	Anastasio
Support Card 1056	Sherri	Oakley
Support Card 1057	Sherri	Oakley
Support Card 1058	Shirley	Weldemere
Support Card 1059	Shirley	Weldemere
Support Card 1060	Shirlyn	Vogel
Support Card 1061	Stephen	Longacre
Support Card 1062	Stephen	Waterbrook
Support Card 1063	Steve	Borgnis
Support Card 1064	Steve	Borgnis
Support Card 1065	Steve	Clifton
Support Card 1066	Steve	Cloud
Support Card 1067	Steve	Elder
Support Card 1068	Steve	Engell
Support Card 1069	Steve	Gonet
Support Card 1070	Steve	Gonet
Support Card 1071	Steve	Hurliman
Support Card 1072	Steve	O'Brien
Support Card 1073	Steve	Pachaud
Support Card 1074	Steve	Shappert
Support Card 1075	Steve	Shappert
Support Card 1076	Steve	Smith
Support Card 1077	Steve	Wade
Support Card 1078	Steven	Barnes
Support Card 1079	Steven	Sharsmitt
Support Card 1080	Steven	Holli
Support Card 1081	Steven	Kuester
Support Card 1082	Sue	Sins
Support Card 1083	Sumita	Davis
Support Card 1084	Susan	Jueck
Support Card 1085	Susan	Walsh
Support Card 1086	Suzanne	King
Support Card 1087	Suzette	Urlie
Support Card 1088	Suzie	Bailey
Support Card 1089	T.	Trathen
Support Card 1090	Tadhg	Hennessy
Support Card 1091	Tamara	McFarland
Support Card 1092	Tammy	Andreozzi
Support Card 1093	Taura	Whitehead
Support Card 1094	Tava	Riley
Support Card 1095	Ted	Scruggs
Support Card 1096	Ted	Scruggs
Support Card 1097	Tera	Yeoman
Support Card 1098	Terence	Prechter
Support Card 1099	Teresa	Baumgartner
Support Card 1100	Teresa	Baumgartner
Support Card 1101	Teresa	Baumgartner
Support Card 1102	Terry	Thompson

Support Card 1103	Terryl	Merritt
Support Card 1104	Theresa	Bonetti
Support Card 1105	Theresa	Kingsbury
Support Card 1106	Thomas	Burns
Support Card 1107	Thomas	Coopman
Support Card 1108	Thomas	McDermott
Support Card 1109	Thomas	Schmidt
Support Card 1110	Tim	Cacy
Support Card 1111	Tim	Callaway
Support Card 1112	Tim	Harrington
Support Card 1113	Tim	Leach
Support Card 1114	Tim	McCall
Support Card 1115	Tim	McKim
Support Card 1116	Tim	McKim
Support Card 1117	Tim	Merry
Support Card 1118	Tim	Palua
Support Card 1119	Tim	Robinson
Support Card 1120	Tina	Stoutner
Support Card 1121	Todd	Newman
Support Card 1122	Tom	Amesbury
Support Card 1123	Tom	Andersen
Support Card 1124	Tom	Andersen
Support Card 1125	Tom	Falls
Support Card 1126	Tom	Jacobson
Support Card 1127	Tom	Kempf
Support Card 1128	Tom	Sackman
Support Card 1129	Tom	Sackman
Support Card 1130	Tom	Schultz
Support Card 1131	Tom	Stockton
Support Card 1132	Tony	Tamayd
Support Card 1133	Travis	Peebles
Support Card 1134	Trent	Wooster
Support Card 1135	Tricia	Allen
Support Card 1136	Trista	Hencley
Support Card 1137	Trista	Hewlley
Support Card 1138	Troy	Frederick
Support Card 1139	Tucker	Cirzius
Support Card 1140	Tyler	Hargrove
Support Card 1141	Tyler	Patchin
Support Card 1142	Valmore	Gauthier
Support Card 1143	Valmore	Gauthier
Support Card 1144	Van	Anthony
Support Card 1145	Vern	Elkins
Support Card 1146	Vivienne	Lahey
Support Card 1147	W. Allsop	McFarland
Support Card 1148	Walter	Snook
Support Card 1149	Warner	Hooker
Support Card 1150	Warner	Hooker
Support Card 1151	Warner	Hooker
Support Card 1152	Wayne	Glenn
Support Card 1153	Wayne	Klauer
Support Card 1154	Wayne	McKay

Support Card 1155	Wayne	Schwartzkopf
Support Card 1156	Wayne	Schwartzkopf
Support Card 1157	Wendy	Horn
Support Card 1158	Wendy	Hutton
Support Card 1159	Wendy	Norman
Support Card 1160	Wes	Hawkins
Support Card 1161	Wes	Mayfield
Support Card 1162	Wes	Mayfield
Support Card 1163	Wilbur	Marshall
Support Card 1164	Willard	Schoellerman
Support Card 1165	William	Allsop
Support Card 1166	William	Bishop
Support Card 1167	William	Burke
Support Card 1168	William	Carlson
Support Card 1169	William	Ferris
Support Card 1170	William	Mudd
Support Card 1171	William	Mudd
Support Card 1172	William	Murray
Support Card 1173	William	Ogilvie
Support Card 1174	William	Asher
Support Card 1175	William	Ferris
Support Card 1176	Wilma	Wilkinson
Support Card 1177	Wilton	Fryer
Support Card 1178	Wilton	Fryer
Support Card 1179	Zeth	Cooper
Support Card 1180	Zeth	Cooper
Support Card 1181	Zola	Rackley
Support Card 1182		Beeman
Support Card 1183		Dodd
Support Card 1184		Wyman

Individual Letters

Letter Number	Author(s)	
	First Name	Last Name
Individual Letter 1	Aaron	Zueck
Individual Letter 2	Abby	Velasquez
Individual Letter 3	Addie	Patrick
Individual Letter 4	Addie	Patrick
Individual Letter 5	Al	Mader
Individual Letter 6	Alan	Emerson
Individual Letter 7	Alecia	Weisman
Individual Letter 8	Alex	Lerch
Individual Letter 9	Ali	Arnerich
Individual Letter 10	Alice	Williams-Root
Individual Letter 11	Alice	Williams-Root
Individual Letter 12	Alison	Alkon
Individual Letter 13	Allison	Bischofberger
Individual Letter 14	Allison	Roush
Individual Letter 15	Amie	Ferrier
Individual Letter 16	Amy	Geiser

Individual Letter 17	Amy Todd	Hobbs Sutler
Individual Letter 18	Andrea	Berry
Individual Letter 19	Andrew	Ribotto
Individual Letter 20	Andrew	Wilson
Individual Letter 21	Angie	Pereira
Individual Letter 22	Ani	Kington
Individual Letter 23	Anita	Pearson
Individual Letter 24	Anita	Wald-Tuttle
Individual Letter 25	Anita	Wald-Tuttle
Individual Letter 26	Anita	Wald-Tuttle
Individual Letter 27	Ann	Finneran
Individual Letter 28	Ann	Vogel
Individual Letter 29	Ann	Wallace
Individual Letter 30	Anna	Sullivan
Individual Letter 31	Anne	Costa
Individual Letter 32	Anne	Lyon
Individual Letter 33	Anne Ken	Merdinger Merdinger
Individual Letter 34	Antoinette	Regan
Individual Letter 35	Antonio	Dominguez
Individual Letter 36	April	Webb
Individual Letter 37	Aque	Baila
Individual Letter 38	Art	Healy
Individual Letter 39	Ashley	Hall
Individual Letter 40	Audrey Carolyn Larry Ginger Carol Jack Lynda Patricia Walt	Hight Homan Homan Van Wagner McDonald Broneith Cooper Holler Watson
Individual Letter 41	Audrey	Jacus
Individual Letter 42	Austin	Fouyer
Individual Letter 43	Avila	Lowrance
Individual Letter 44	Barbara	Gentry
Individual Letter 45	Barbara	Jensen
Individual Letter 46	Barbara	Kroczak
Individual Letter 47	Barbara	Larsen
Individual Letter 48	Barbara	Raymond
Individual Letter 49	Barney	Dewey
Individual Letter 50	Becky	Smith
Individual Letter 51	Ben	Preston
Individual Letter 52	Bernell	Scott
Individual Letter 53	Bernell	Scott
Individual Letter 54	Bernie	Zimmerman
Individual Letter 55	Bert	Heinzelman
Individual Letter 56	Betty	Pearson
Individual Letter 57	Beverly	Martling
Individual Letter 58	Beverly	Stout
Individual Letter 59	Bill	Lawrence

Individual Letter 60	Bishop	Randall
Individual Letter 61	B.J.	Flint
Individual Letter 62	B.J. Holly Pat Gayle	Griffin Bundock Sharp Crossley
Individual Letter 63	B.J. Holly Pat Gayle	Griffin Bundock Sharp Crossley
Individual Letter 64	Bob Betty	Larimer Larimer
Individual Letter 65	Bob	Zuelsdorf
Individual Letter 66	Bonnie	Murphy
Individual Letter 67	Brandon	Butrick
Individual Letter 68	Brandon	Butrick
Individual Letter 69	Brandon	Hall
Individual Letter 70	Brian	Swagerty
Individual Letter 71	Brion	Dunbar
Individual Letter 72	Bruce Deborah	Kilmesh Cole
Individual Letter 73	Cameron	Brown
Individual Letter 74	Carlyle	Miller
Individual Letter 75	Carol Bill	Brady Brady
Individual Letter 76	Carol	Fenner
Individual Letter 77	Carol	Gicker
Individual Letter 78	Carol	Hyndman
Individual Letter 79	Carol	Kuczora
Individual Letter 80	Carol	Kuczora
Individual Letter 81	Carol	McMillan
Individual Letter 82	Carol	Nelson
Individual Letter 83	Carol	Purchase
Individual Letter 84	Carol	Todd
Individual Letter 85	Carolee	Weisberg
Individual Letter 86	Caroline	Courtright
Individual Letter 87	Caroline	Courtright
Individual Letter 88	Caroline	Courtright
Individual Letter 89	Carolyn Steve	Battaini Battaini
Individual Letter 90	Carolyn Steve	Battaini Battaini
Individual Letter 91	Carolyn Steve	Battaini Battaini
Individual Letter 92	Carolyn	Hansen-Dix
Individual Letter 93	Carrie	Finlay
Individual Letter 94	Catalina	Davis
Individual Letter 95	Cate	Keller
Individual Letter 96	Catherine	Flowers
Individual Letter 97	Catherine	Hardy
Individual Letter 98	Catherine	Stifter
Individual Letter 99	Cathy	Benoit
Individual Letter 100	Cathy	Boyle-Dowd

Individual Letter 101	Cathy	Edger
Individual Letter 102	Cauleen	Lauria
Individual Letter 103	Cecelia	Royal
Individual Letter 104	Cecilia	Reynolds
Individual Letter 105	Chad	Henderson
Individual Letter 106	Charles	Benner
Individual Letter 107	Charles	Brock
Individual Letter 108	Charlie	Landau
Individual Letter 109	Charlotte	Benner
Individual Letter 110	Charly	Price
Individual Letter 111	Charly	Price
Individual Letter 112	Charmian	Railsback
Individual Letter 113	Cheri	Flanigan
Individual Letter 114	Cheri	Martin
Individual Letter 115	Cheryl	Balmain
Individual Letter 116	Cheryl	Borad
Individual Letter 117	Cheryl	Morris
Individual Letter 118	Cheryl Byron	Zook Zook
Individual Letter 119	Chris	Buzzini
Individual Letter 120	Chris	Colbert
Individual Letter 121	Chris	Themelis
Individual Letter 122	Christie	Gillison
Individual Letter 123	Christina	Pradhan
Individual Letter 124	Christina	Pradhan
Individual Letter 125	Christina	Pradhan
Individual Letter 126	Christine	Alford
Individual Letter 127	Christopher	Carpenter
Individual Letter 128	Christopher	Hall
Individual Letter 129	Christy	Hubbard
Individual Letter 130	Chuck	Cropley
Individual Letter 131	Chula	Gemignani
Individual Letter 132	Clay	Olson
Individual Letter 133	Clay	Olson
Individual Letter 134	Clea	Vigneux
Individual Letter 135	Cliff	Case
Individual Letter 136	Colleen	Carson
Individual Letter 137	Collete Michael	Castro McLean
Individual Letter 138	Connie	Finster
Individual Letter 139	Constance	Wright
Individual Letter 140	Corinna	Fish
Individual Letter 141	Corrine	Jones
Individual Letter 142	Craig	Arthur
Individual Letter 143	Craig	Crebbin
Individual Letter 144	Craig	McCann
Individual Letter 145	Cynthia	Yaguda
Individual Letter 146	D.	Virva
Individual Letter 147	Daniel	Behn
Individual Letter 148	Daniel	Behn
Individual Letter 149	Danielle	Boucher
Individual Letter 150	Danny	Milman

Individual Letter 151	Daun	Langston
Individual Letter 152	Dave Dianna	Connell Connell
Individual Letter 153	Dave Renae	Ericksen Ericksen
Individual Letter 154	Dave	Taylor
Individual Letter 155	David	Agran
Individual Letter 156	David	Agran
Individual Letter 157	David	Bowman
Individual Letter 158	David	Bowman
Individual Letter 159	David	Costa
Individual Letter 160	David	Figuly
Individual Letter 161	David	George
Individual Letter 162	David Victoria	Hardy Hardy
Individual Letter 163	David	Herbst
Individual Letter 164	David	Herbst
Individual Letter 165	David	Kimmel
Individual Letter 166	David	Morris
Individual Letter 167	David	O'Donnell
Individual Letter 168	David	Putnam
Individual Letter 169	David	Putnam
Individual Letter 170	David	Unterman
Individual Letter 171	David	Ward
Individual Letter 172	Dawn	C.
Individual Letter 173	Dawna	Johnson
Individual Letter 174	D.C.	Spooner
Individual Letter 175	Deb	LeBlanc
Individual Letter 176	Debbie	Lindh
Individual Letter 177	Debbie	McKitrick
Individual Letter 178	Deborah	Churchill
Individual Letter 179	Deborah	Curtis
Individual Letter 180	Deborah	Pinto
Individual Letter 181	Deborah Maureen	Shriver Miranda
Individual Letter 182	Deborah Maureen	Shriver Miranda
Individual Letter 183	Deborah Maureen	Shriver Miranda
Individual Letter 184	Deborah Maureen	Shriver Miranda
Individual Letter 185	Deborah	Stone-Stapleton
Individual Letter 186	Debra	Dworaczyk
Individual Letter 187	Denis Barbara	Drew Drew
Individual Letter 188	Denise	Bellas
Individual Letter 189	Denise	Cain
Individual Letter 190	Denise	Ilmanen
Individual Letter 191	Denise	Rockwood
Individual Letter 192	Dennis	Wolfers
Individual Letter 193	Diana	Runnels
Individual Letter 194	Diane	Cherry
Individual Letter 195	Diane	Figuly

Individual Letter 196	Diane	Gould
Individual Letter 197	Diane	Gould
Individual Letter 198	Diane	Graham
Individual Letter 199	Dianna	Suarez
Individual Letter 200	Diedra	Spohler
Individual Letter 201	Don	Haislet
Individual Letter 202	Don	Madden
Individual Letter 203	Donald Karen	Davis Davis
Individual Letter 204	Donald	Gagliasso
Individual Letter 205	Donn	Carlson
Individual Letter 206	Donna	Peizer
Individual Letter 207	Donna	Taggart
Individual Letter 208	Doug	Farrell
Individual Letter 209	Douglas	Haussler
Individual Letter 210	Ed Lynette	Cepeda Cepeda
Individual Letter 211	Ed	Suchow
Individual Letter 212	Ed	Suchow
Individual Letter 213	Edward	Falick
Individual Letter 214	Edward Linda	Falick Marting
Individual Letter 215	Eileen	Stutz
Individual Letter 216	E.J.	Sheffner
Individual Letter 217	Elaine	Westfall
Individual Letter 218	Elaine	Westfall
Individual Letter 219	Elaine	Whooley
Individual Letter 220	Elalina	Cuss
Individual Letter 221	Eli	Duber
Individual Letter 222	Eli	Ferrier
Individual Letter 223	Elise	Stupi
Individual Letter 224	Elise	Zink
Individual Letter 225	Elissa Benjamin	Preston Preston
Individual Letter 226	Elizabeth	Mendelsohn
Individual Letter 227	Elizabeth	Barron
Individual Letter 228	Elizabeth	Linsky
Individual Letter 229	Ellen	Davis
Individual Letter 230	Ellen	Johnson
Individual Letter 231	Ellen	Macdonald
Individual Letter 232	Elliot	Schneiderman
Individual Letter 233	Elsa	Burt
Individual Letter 234	Emilie	Rose
Individual Letter 235	Emily	Weissman
Individual Letter 236	Eric	Dunn
Individual Letter 237	Eric	Jorgensen
Individual Letter 238	Ericha	Woolley
Individual Letter 239	Erika	Gaylor
Individual Letter 240	Erika	Johnson
Individual Letter 241	Erika	Neeley
Individual Letter 242	Erin	Carter
Individual Letter 243	Erin	Smith

Individual Letter 244	Eugene	Gilligan
Individual Letter 245	Eugene	Gilligan
Individual Letter 246	Eva	Saelens
Individual Letter 247	Eva	Saelens
Individual Letter 248	Evelyn	Soltero
Individual Letter 249	Fernando Nancy	Rojo Rojo
Individual Letter 250	Florence	Themelis
Individual Letter 251	Frank	Gould
Individual Letter 252	Frank	Lawrence
Individual Letter 253	Fred	Pohlmann
Individual Letter 254	G. Larry	Engel
Individual Letter 255	G. Larry	Engel
Individual Letter 256	Gabriel	Kulp
Individual Letter 257	Gail	Vaughan
Individual Letter 258	Gail	Vaughan
Individual Letter 259	Garrett	Stuessy
Individual Letter 260	Gary	Ambuehl
Individual Letter 261	Gary	Ambuehl
Individual Letter 262	Gary	Baker
Individual Letter 263	Gary	Cartzdafner
Individual Letter 264	Gary	Emanuel
Individual Letter 265	Gary	Griffith
Individual Letter 266	Gary Christine	Griffith Griffith
Individual Letter 267	Gary	Spriggs
Individual Letter 268	Gary	Zimmerman
Individual Letter 269	Gary	Zimmerman
Individual Letter 270	Gaven	Moore
Individual Letter 271	Geoff	Pollard
Individual Letter 272	Geoffrey	Nelson
Individual Letter 273	Gerald	Thomas
Individual Letter 274	Geri	Stout
Individual Letter 275	Geri	Stout
Individual Letter 276	Gerri	Snell
Individual Letter 277	Glen	Garrod
Individual Letter 278	Glenna	Rogers
Individual Letter 279	Gordon	Mann
Individual Letter 280	Greg	DeYoung
Individual Letter 281	Greg	Wolfe
Individual Letter 282	Gregory	Weisswasser
Individual Letter 283	Guarionex	Delgado
Individual Letter 284	Gwen	Moore
Individual Letter 285	Hank	Meals
Individual Letter 286	Harry	Woodum
Individual Letter 287	Harry	Wyeth
Individual Letter 288	Heidi	Breuer
Individual Letter 289	Helen Gerald	Martini Martini
Individual Letter 290	Holly	Ahrens
Individual Letter 291	Holly	Ahrens
Individual Letter 292	Hunter	Jones

Individual Letter 293	Inge	Ivens
Individual Letter 294	Irene	Frazier
Individual Letter 295	Itara	O'Connell
Individual Letter 296	J.T.	Mayr
Individual Letter 297	J.T.	Mayr
Individual Letter 298	Jackie	McRae
Individual Letter 299	Jacqi	Britton
Individual Letter 300	Jacqueline	Finley
Individual Letter 301	Jake	Jacus
Individual Letter 302	Jalana	Smith
Individual Letter 303	James	Blimthorpe
Individual Letter 304	James	Blimthorpe
Individual Letter 305	James	Haufler
Individual Letter 306	James	McMaster
Individual Letter 307	James	Mullen
Individual Letter 308	Jamie	Legon
Individual Letter 309	Jan	Todd
Individual Letter 310	Jan	Zimmerman
Individual Letter 311	Janak	Kimmel
Individual Letter 312	Jane	Baylis-Garcia
Individual Letter 313	Jane	Garcia
Individual Letter 314	Jane	Markham
Individual Letter 315	Jane	Pelton
Individual Letter 316	Jane	Primrose
Individual Letter 317	Janet	Brisson
Individual Letter 318	Janet	Cinquegrana
Individual Letter 319	Janet	Cinquegrana
Individual Letter 320	Janet	Dunstan
Individual Letter 321	Janet	Richman
Individual Letter 322	Janet	Rosner
Individual Letter 323	Janette Chris	Carpenter Carpenter
Individual Letter 324	Janice	Bedayn
Individual Letter 325	Jason	Privett
Individual Letter 326	Jason	White
Individual Letter 327	Jay	Jacquet
Individual Letter 328	Jean	Matsuno
Individual Letter 329	Jeannine	Mayer
Individual Letter 330	Jeff	Brownwood
Individual Letter 331	Jeff	Claussen
Individual Letter 332	Jeff	Kane
Individual Letter 333	Jeff	Kane
Individual Letter 334	Jeff	Kane
Individual Letter 335	Jeff	Litton
Individual Letter 336	Jeff	Peach
Individual Letter 337	Jeff	Russell
Individual Letter 338	Jeffrey	Mason
Individual Letter 339	Jennifer	Buck-Diaz
Individual Letter 340	Jennifer	Burt
Individual Letter 341	Jennifer	Dalmau
Individual Letter 342	Jennifer	Iams-McGuire
Individual Letter 343	Jennifer	Kelly

Individual Letter 344	Jennifer	Long
Individual Letter 345	Jennifer	Todd
Individual Letter 346	Jennifer	Weir
Individual Letter 347	Jere	McGrew
Individual Letter 348	Jeree	Waller
Individual Letter 349	Jesse	Mendez
Individual Letter 350	Jesse	Nugent
Individual Letter 351	Jessica	Higgins
Individual Letter 352	Jill	Francis
Individual Letter 353	Jim	Bair
Individual Letter 354	Jim Helen	Bradshaw Bradshaw
Individual Letter 355	Jim	Cunningham
Individual Letter 356	Jim	Cunningham
Individual Letter 357	Jim	Haynes
Individual Letter 358	Jim	Haynes
Individual Letter 359	Jim	Haynes
Individual Letter 360	Jim Erika	Haynes Haynes
Individual Letter 361	Jim	Morris
Individual Letter 362	Jim Renate	Otto Otto
Individual Letter 363	Jim	Wahler
Individual Letter 364	Jim	Wahler
Individual Letter 365	Jim	Weir
Individual Letter 366	Jimena	Saravia
Individual Letter 367	Joan	Goddard
Individual Letter 368	Joan	Griffin
Individual Letter 369	Joan Jonathan	Keyes Peck
Individual Letter 370	Joan Jonathan	Keyes Peck
Individual Letter 371	Joan Jonathan	Keyes Peck
Individual Letter 372	Joan	Robertson
Individual Letter 373	Joanna	Pedroncelli
Individual Letter 374	Joanne	Drummond
Individual Letter 375	Joanne Susan	Evers Greenawald
Individual Letter 376	Joanne	Wohlfeld
Individual Letter 377	John	Alevizakis
Individual Letter 378	John	Alevizakis
Individual Letter 379	John	Alevizakis
Individual Letter 380	John	Deam
Individual Letter 381	John	Fischer
Individual Letter 382	John	Haverty
Individual Letter 383	John	Hellwig
Individual Letter 384	John Melody	O'Shea O'Shea
Individual Letter 385	John	Palmer
Individual Letter 386	John	Purchase
Individual Letter 387	John	Reeder
Individual Letter 388	John	Vaughan

Individual Letter 389	John	Vaughan
Individual Letter 390	John	Vaughan
Individual Letter 391	John	Vaughan
Individual Letter 392	John	Vaughan
Individual Letter 393	John	Vaughan
Individual Letter 394	John	Vaughan
Individual Letter 395	John	Volz
Individual Letter 396	John	Volz
Individual Letter 397	Jon	Benner
Individual Letter 398	Jonas	Ketterle
Individual Letter 399	Jonathan	Keehn
Individual Letter 400	Jonathan	Nolan
Individual Letter 401	Jorge	Velasquez
Individual Letter 402	Jorge	Velasquez
Individual Letter 403	Joseph	Riley
Individual Letter 404	Joshua	Fisher
Individual Letter 405	Joy	Waite
Individual Letter 406	Joy	Waite
Individual Letter 407	Joyce	Hoffman
Individual Letter 408	Jude	Bischoff
Individual Letter 409	Judith	Brown
Individual Letter 410	Judith	Cooper
Individual Letter 411	Judith	DeVine
Individual Letter 412	Judith Lawrence	Emmons Emmons
Individual Letter 413	Judy	McGrain
Individual Letter 414	Judy Brian	Miner Miner
Individual Letter 415	Julie	Barnum
Individual Letter 416	Julie	Becker
Individual Letter 417	Julie	Carville
Individual Letter 418	Julie	Enzor-Wilson
Individual Letter 419	Julie	Enzor-Wilson
Individual Letter 420	Juliette	Kunin
Individual Letter 421	June	Oberdorfer
Individual Letter 422	Justine	Jacus
Individual Letter 423	K. Robert	Foster
Individual Letter 424	Kali	Feiereisel
Individual Letter 425	Karen	Farlee
Individual Letter 426	Karen	Melquist
Individual Letter 427	Karin	Davenport
Individual Letter 428	Karri	Knowles
Individual Letter 429	Kate	Frame
Individual Letter 430	Kate	Gazzo
Individual Letter 431	Kate	Kane
Individual Letter 432	Katharine	Popenuk
Individual Letter 433	Katherine	Plocharczyk
Individual Letter 434	Katherine	Thompson
Individual Letter 435	Kathleen	Fenton
Individual Letter 436	Kathleen	Madeira
Individual Letter 437	Kathleen	Madeira
Individual Letter 438	Kathleen	Madeira

Individual Letter 439	Kathleen	Ogburn
Individual Letter 440	Kathleen	Woodson
Individual Letter 441	Kathryn	Eldredge
Individual Letter 442	Katrina	Christenson
Individual Letter 443	Kay	Maston
Individual Letter 444	Kayla	Koontz
Individual Letter 445	Kayla	Pearson
Individual Letter 446	Keith	Brown
Individual Letter 447	Keith	Thomassen
Individual Letter 448	Kelly Jim	Holland Holland
Individual Letter 449	Kelly	Trueman
Individual Letter 450	Kendal	Smeeth
Individual Letter 451	Kerry Sue	Anderson Anderson
Individual Letter 452	Kim	Crevoiserat
Individual Letter 453	Kim	James
Individual Letter 454	Kim	James
Individual Letter 455	Kim	Taylor
Individual Letter 456	Kimberly	Cappa
Individual Letter 457	Kimberly	Shureen
Individual Letter 458	Kovill	Shine
Individual Letter 459	Kristen	Hensley
Individual Letter 460	Kristen	Krauel-Privett
Individual Letter 461	Kristen	Krauel-Privett
Individual Letter 462	Kristy	Bennett
Individual Letter 463	L. Tim	Ackerman
Individual Letter 464	Laina	Levy
Individual Letter 465	LaMont	Reynolds
Individual Letter 466	Lanny	Netz
Individual Letter 467	Larik	Butyrin
Individual Letter 468	Larry Patsy	Rieger Rieger
Individual Letter 469	Laura	Balch
Individual Letter 470	Laura Donald	Gagliasso Gagliasso
Individual Letter 471	Laura	Gerhart
Individual Letter 472	Laura	LeBleu
Individual Letter 473	Laura	Pendell
Individual Letter 474	Lauran Cy	Rinck Rinck
Individual Letter 475	Lauren	Anderson
Individual Letter 476	Lauren	Drutz
Individual Letter 477	Lauren	Drutz
Individual Letter 478	Laurie	DesJardins
Individual Letter 479	Laurie	Segal
Individual Letter 480	Laurie	Segal
Individual Letter 481	Lea	Wheatley
Individual Letter 482	Len Debbie	Schneider Schneider
Individual Letter 483	Letitia Robert	Jacobs Jacobs
Individual Letter 484	Lew	Sitzer

Individual Letter 485	Lew	Sitzer
Individual Letter 486	Liese	Greensfelder
Individual Letter 487	Lilly	Grenz
Individual Letter 488	Lily	Marie
Individual Letter 489	Linda	Boswell
Individual Letter 490	Linda	Carlson
Individual Letter 491	Linda	Cohen
Individual Letter 492	Linda	Ennis
Individual Letter 493	Linda	Fillion
Individual Letter 494	Linda	Howe
Individual Letter 495	Linda Daniel	Ketcham Ketcham
Individual Letter 496	Linda	Meyers
Individual Letter 497	Lisa	McCandless
Individual Letter 498	Lisa	Nowlain
Individual Letter 499	Lisa	Rowe
Individual Letter 500	Lizary Jeremy	Jones Jones
Individual Letter 501	Lorraine	Hendriksen
Individual Letter 502	Lorraine	Hendriksen
Individual Letter 503	Lorraine	Reich
Individual Letter 504	Lorraine Terry	Walter Sullivan
Individual Letter 505	Lou	Johnson
Individual Letter 506	Louay	Owaidat
Individual Letter 507	Louis	Jones
Individual Letter 508	Louis	Quaintance
Individual Letter 509	Louisa	Suta
Individual Letter 510	Louise	Jackson
Individual Letter 511	Louise	Taylor
Individual Letter 512	Luke	Berliner
Individual Letter 513	Lynn	Forbes
Individual Letter 514	M.	Nyborg
Individual Letter 515	Madeleine	Dowd
Individual Letter 516	Maile	McGrew-Frede
Individual Letter 517	Maile	McGrew-Frede
Individual Letter 518	Mardi	Naythons
Individual Letter 519	Margaret	Joehnck
Individual Letter 520	Margaret Milan	Vodicka Vodicka
Individual Letter 521	Maria	Benner
Individual Letter 522	Marion	Blair
Individual Letter 523	Marion	Blair
Individual Letter 524	Marisa	Jackson-Kinman
Individual Letter 525	Mark	Fenicle
Individual Letter 526	Mark	Fenicle
Individual Letter 527	Mark	Johnson
Individual Letter 528	Mark	Johnson
Individual Letter 529	Mark	Johnson
Individual Letter 530	Mark	Johnson
Individual Letter 531	Mark	Johnson
Individual Letter 532	Mark	Johnson

Individual Letter 533	Mark	Johnson
Individual Letter 534	Mark	Johnson
Individual Letter 535	Mark	Johnson
Individual Letter 536	Mark	Johnson
Individual Letter 537	Mark	Johnson
Individual Letter 538	Mark	Johnson
Individual Letter 539	Mark	Johnson
Individual Letter 540	Mark	Johnson
Individual Letter 541	Mark	Johnson
Individual Letter 542	Mark Dawna	Johnson Johnson
Individual Letter 543	Mark	Johnson
Individual Letter 544	Mark	Machado
Individual Letter 545	Mark	Seufert
Individual Letter 546	Mark	Wilson
Individual Letter 547	Mark	Wilson
Individual Letter 548	Martha	Turner
Individual Letter 549	Martha	Turner
Individual Letter 550	Marv	Hoffman
Individual Letter 551	Marv	Hoffman
Individual Letter 552	Marv	Hoffman
Individual Letter 553	Mary	Anderson
Individual Letter 554	Mary	Bennett
Individual Letter 555	Mary	Coleman
Individual Letter 556	Mary	Good
Individual Letter 557	Mary	Lee
Individual Letter 558	Mary	Padua
Individual Letter 559	Mary	Peterson
Individual Letter 560	Mary	Swagerty
Individual Letter 561	Maryanne	Murphy
Individual Letter 562	Maryanne	Murphy
Individual Letter 563	Maryanne	Murphy
Individual Letter 564	Maryanne	Murphy
Individual Letter 565	Maryanne	Murphy
Individual Letter 566	Maryanne	Murphy
Individual Letter 567	Maryanne	Murphy
Individual Letter 568	Maryanne	Murphy
Individual Letter 569	Maryanne	Murphy
Individual Letter 570	Matt Shannon	Cotter Cotter
Individual Letter 571	Matt	Gottschalk
Individual Letter 572	Matthew	Coulter
Individual Letter 573	Maureen	Cuthbert
Individual Letter 574	Maureen	Miranda
Individual Letter 575	Megan	Hart
Individual Letter 576	Melanie	Bright
Individual Letter 577	Menkin	Nelson
Individual Letter 578	Michael	Brisson
Individual Letter 579	Michael	Frey
Individual Letter 580	Michael	Habeeb
Individual Letter 581	Michael	Leydon
Individual Letter 582	Michael	Malakian

Individual Letter 583	Michael	Shaw
Individual Letter 584	Michael	Shaw
Individual Letter 585	Michael	Shea
Individual Letter 586	Michael	Way
Individual Letter 587	Michelene	Bowman
Individual Letter 588	Michelle	Belon
Individual Letter 589	Michelle	Lewis
Individual Letter 590	Michelle	Reynolds
Individual Letter 591	Mickey	Jaynes
Individual Letter 592	Mickey	Jaynes
Individual Letter 593	Mielle	Rose
Individual Letter 594	Mike	Frasu
Individual Letter 595	Mike	French
Individual Letter 596	Mike	Pasner
Individual Letter 597	Mike Mary	Peterson Peterson
Individual Letter 598	Mike Jan	Weaver Weaver
Individual Letter 599	Mikos	Fabersunne
Individual Letter 600	Miles	Wolfers
Individual Letter 601	Mindy	Oberne
Individual Letter 602	Mira	Clark
Individual Letter 603	Molly	Harrison
Individual Letter 604	Molly Warren	Harrison Pfahl
Individual Letter 605	Molly	Nichols
Individual Letter 606	Mykola	Kindrat
Individual Letter 607	Nancy	Dewey
Individual Letter 608	Nancy	Dewey
Individual Letter 609	Nancy	Henson
Individual Letter 610	Nancy	Piette
Individual Letter 611	Nancy	Rojo
Individual Letter 612	Nancy	Rojo
Individual Letter 613	Nancy	Shanteau
Individual Letter 614	Natalie	Browning
Individual Letter 615	Nate	Collins
Individual Letter 616	Nathan	Helm-Burger
Individual Letter 617	Nathan	W.
Individual Letter 618	Nathan	W.
Individual Letter 619	Neal	Siller
Individual Letter 620	Nelson	Foster
Individual Letter 621	Nicki	Hansen-Dix
Individual Letter 622	Nicki	Hansen-Dix
Individual Letter 623	Nicki	Hansen-Dix
Individual Letter 624	Nina	Cunningham
Individual Letter 625	Nina	Cunningham
Individual Letter 626	Nina	Cunningham
Individual Letter 627	Nora	Nausbaum
Individual Letter 628	Nora	Risen
Individual Letter 629	Norema	Strongin
Individual Letter 630	Norema	Strongin
Individual Letter 631	Norma	Solarz

Individual Letter 632	Norma	Solarz
Individual Letter 633	Osher	Levi
Individual Letter 634	Pam	Heard
Individual Letter 635	Pam	Kissler
Individual Letter 636	Pam	Kissler
Individual Letter 637	Pamela	Biery
Individual Letter 638	Pamela	Jung
Individual Letter 639	Pamela	Whitman
Individual Letter 640	Pat	Henderson
Individual Letter 641	Patricia	Bennett
Individual Letter 642	Patrick	Johnson
Individual Letter 643	Patti	Grijalva
Individual Letter 644	Paul	Crovo
Individual Letter 645	Paul	Elms
Individual Letter 646	Paul	McGrew
Individual Letter 647	Paul	McMillan
Individual Letter 648	Paul	Schwartz
Individual Letter 649	Paul	Schwartz
Individual Letter 650	Paul	Snyder
Individual Letter 651	Paula	Strang
Individual Letter 652	Peggy	Kelly
Individual Letter 653	Penelope	Curtis
Individual Letter 654	Perissa	Busick
Individual Letter 655	Pete	Christakes
Individual Letter 656	Peter	Arbin
Individual Letter 657	Peter	Brewer
Individual Letter 658	Peter	Fromm
Individual Letter 659	Peter	Stevenson
Individual Letter 660	Peter	Stevenson
Individual Letter 661	Rachael	Elam
Individual Letter 662	Rachel	
Individual Letter 663	Ralph	Silberstein
Individual Letter 664	Ray	Bryars
Individual Letter 665	Ray	Kinman
Individual Letter 666	Ray	Kinman
Individual Letter 667	Rebecca	DePont
Individual Letter 668	Rebecca	Vandegrift
Individual Letter 669	Reed	Hamilton
Individual Letter 670	Renata	Henry
Individual Letter 671	Resa	Huck
Individual Letter 672	Richard	Charnley
Individual Letter 673	Richard	Drace
Individual Letter 674	Richard	Johnston
Individual Letter 675	Rick	Range
Individual Letter 676	Rick Dianne	Range Range
Individual Letter 677	Rick Dianne	Range Range
Individual Letter 678	Rick	Smith
Individual Letter 679	Ricki	Heck
Individual Letter 680	Risa	Roseman
Individual Letter 681	Rob	Katzenstein

Individual Letter 682	Robert Francesca	Erickson Erickson
Individual Letter 683	Robert	Gulbis
Individual Letter 684	Robert	Gulbis
Individual Letter 685	Robert	Hubbard
Individual Letter 686	Robert	Jewel
Individual Letter 687	Robert	Rhodes
Individual Letter 688	Robert	Root
Individual Letter 689	Robert	Shulman
Individual Letter 690	Robert Ann	Thorpe Thorpe
Individual Letter 691	Robert	Wheatley
Individual Letter 692	Robin	DeMartini
Individual Letter 693	Robin	Ehlers
Individual Letter 694	Robin	Hart
Individual Letter 695	Robin	Milam
Individual Letter 696	Robin	Resovich
Individual Letter 697	Ron	Rosner
Individual Letter 698	Ron Julie	
Individual Letter 699	Rona	Scablook
Individual Letter 700	Ronald	Dow
Individual Letter 701	Rondal	Snodgrass
Individual Letter 702	Rondal	Snodgrass
Individual Letter 703	Rondal	Snodgrass
Individual Letter 704	Rose	Capaccioli
Individual Letter 705	Rosemarie	Capaccioli
Individual Letter 706	Ross	Guenther
Individual Letter 707	Roxanne	Shepherd
Individual Letter 708	S.	Fenile
Individual Letter 709	Sandra	Bacon
Individual Letter 710	Sandra	Hewston
Individual Letter 711	Sara	Brownwood
Individual Letter 712	Sarah	Lazard
Individual Letter 713	Sarah	Snyder
Individual Letter 714	Sasha	Soukup
Individual Letter 715	Scot Patty	Marsters Marsters
Individual Letter 716	Scott	Peterson
Individual Letter 717	Sean	Johnson
Individual Letter 718	Shannon	Ross
Individual Letter 719	Shar	McLeod
Individual Letter 720	Sharon	Delgado
Individual Letter 721	Sharon	Seck
Individual Letter 722	Sharon	Wagner
Individual Letter 723	Shayna	Christie
Individual Letter 724	Sheerlie	Ryngler
Individual Letter 725	Sheila	LaRue
Individual Letter 726	Sheri	Fogarty
Individual Letter 727	Sheri	Hoss
Individual Letter 728	Sheryl	Luxon
Individual Letter 729	Shirley	Freriks

Individual Letter 730	Shirley	Williams
Individual Letter 731	Stacy	Beilman
Individual Letter 732	Stacy	Beilman
Individual Letter 733	Stefanie	Martinez
Individual Letter 734	Stephanie	Almanzar
Individual Letter 735	Stephanie	Steyer
Individual Letter 736	Stephen	Baker
Individual Letter 737	Sterling	Bailey
Individual Letter 738	Sterling	Honea
Individual Letter 739	Sterling	Honea
Individual Letter 740	Sterling	Honea
Individual Letter 741	Sterling	Honea
Individual Letter 742	Steve Carolyn	Battaini Battaini
Individual Letter 743	Steve	Farrage
Individual Letter 744	Steve	Hartshorn
Individual Letter 745	Steve Claudia	Mendoza Groves
Individual Letter 746	Steve	Nicola
Individual Letter 747	Steve Wendy	Nicola Thompson
Individual Letter 748	Stevee	Duber
Individual Letter 749	Steven	Millard
Individual Letter 750	Stuart	Beach
Individual Letter 751	Summer	Scanlan
Individual Letter 752	Summer	Scanlan
Individual Letter 753	Sunnie	Skiles
Individual Letter 754	Susan	Brandt
Individual Letter 755	Susan	Graf
Individual Letter 756	Susan	Graf
Individual Letter 757	Susan	Jaffe
Individual Letter 758	Susan	Kemp
Individual Letter 759	Susan	Merrill
Individual Letter 760	Susan	Reynolds
Individual Letter 761	Susan Edward	Turney Sherman
Individual Letter 762	Susan	Wilson
Individual Letter 763	Susanna	Wilson
Individual Letter 764	Suzanne Kevin	Costa Costa
Individual Letter 765	Suzanne Rob	Ferroggiaro Ferroggiaro
Individual Letter 766	Suzanne	Hall
Individual Letter 767	Suzanne	Smith
Individual Letter 768	Suzi	Kerston
Individual Letter 769	Syd	Brown
Individual Letter 770	Syd	Brown
Individual Letter 771	Sylvia	Otton
Individual Letter 772	Tamara	Snyder
Individual Letter 773	Tammy	McCrary
Individual Letter 774	Tandra	Webb
Individual Letter 775	Tanis	Thorne
Individual Letter 776	Tanis	Thorne

Individual Letter 777	Ted	Ahrens
Individual Letter 778	Teresa	Eckerling
Individual Letter 779	Teresa	Langness
Individual Letter 780	Teresa	Wagner
Individual Letter 781	Terri	Pencovic
Individual Letter 782	Terry	Anderson
Individual Letter 783	Terry	McLaughlin
Individual Letter 784	Tess	Lotter
Individual Letter 785	Thomas	Jacobsen
Individual Letter 786	Thomas	Krauel
Individual Letter 787	Thomas	Maher
Individual Letter 788	Thomas	Prato
Individual Letter 789	Tiffany	French
Individual Letter 790	Tiffany	Graves
Individual Letter 791	Tim	Brennan
Individual Letter 792	Tim	Brown
Individual Letter 793	Tim	Stokes
Individual Letter 794	Tina	Hannon
Individual Letter 795	Todd	Wulf
Individual Letter 796	Tom	Behlmer
Individual Letter 797	Tom	Behlmer
Individual Letter 798	Tom	Behlmer
Individual Letter 799	Tom	Behlmer
Individual Letter 800	Tom	Bremser
Individual Letter 801	Tom	Larsen
Individual Letter 802	Tom	Martin
Individual Letter 803	Tom Gloria	Meyers Meyers
Individual Letter 804	Tony	Lauria
Individual Letter 805	Tulum	Dothee
Individual Letter 806	Turiya	Hill
Individual Letter 807	Unknown	
Individual Letter 808	Unknown	
Individual Letter 809	Unknown	
Individual Letter 810	Unknown	
Individual Letter 811	Unknown	
Individual Letter 812	Unknown	
Individual Letter 813	Unknown	
Individual Letter 814	Unknown	
Individual Letter 815	Unknown	
Individual Letter 816	Unknown	
Individual Letter 817	Unknown	
Individual Letter 818	Uta	Reimnitz
Individual Letter 819	Valerie	Kach
Individual Letter 820	Victoria	Rubiales
Individual Letter 821	Virginia	Moran
Individual Letter 822	Wade	Laughter
Individual Letter 823	Walt	Froloff
Individual Letter 824	Walt	Froloff
Individual Letter 825	Walt	Froloff
Individual Letter 826	Walt	Froloff
Individual Letter 827	Walt	Froloff

Individual Letter 828	Walter	O'Dwyer
Individual Letter 829	Wendy	Thompson
Individual Letter 830	William	Clark
Individual Letter 831	William	Clark
Individual Letter 832	William	Clark
Individual Letter 833	William Linda	Culbertson Culbertson
Individual Letter 834	William	Hall
Individual Letter 835	William	Heck
Individual Letter 836	William	Huddleston
Individual Letter 837	William	Larsen
Individual Letter 838	William	Maas
Individual Letter 839	Yasha	Aginsky
Individual Letter 840	Yvonne	Navarro
Individual Letter 841	Zohar	Alevizakis
Individual Letter 842		Borelli/Mann
Individual Letter 843		Nausbaum
Individual Letter 844		Savelly
Individual Letter 845		Walsh

Late Letters

Letter Number	Author(s)	
	First Name	Last Name
Late Letter 1	Christopher	Claydon
Late Letter 2	Nealeen	Coward
Late Letter 3	Rick	Larsen
Late Letter 4	Robert	Burbridge
Late Letter 5	Sebastian	Gotla
Late Letter 6	Valerie	Kack

Special Public Meeting

A transcript of the verbal comments received at the Special Public Meeting on the DEIR is included in this Final EIR and is identified as comment letter "DEIR Meeting."

1.6 ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following chapters:

1. Introduction and List of Commenters

Chapter 1 provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1 also provides a list of commenters who submitted letters in response to the DEIR.

2. Responses to Comments

Chapter 2 presents the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. As noted above, for efficiency and clarity, the comment letters have been organized into 10 distinct categories: Agency Letters; Group Letters;

Form Letter A; Form Letter B; Form Letter C; Form Letter D; Support Cards; Individual Letters; Late Letters; and DEIR Meeting. Therefore, the letter number will correspond to the category (i.e., the first agency letter would be numbered Agency Letter 1), and the first comment in Agency Letter 1 would have the following format: Agcy 1-1. For further example and clarification, the first comment in Group Letter 1 would be numbered Grp 1-1; the first comment in Form Letter A 1 would be A 1-1; the first comment in Form Letter B 1 would be B 1-1; the first comment in Form Letter C 1 would be C 1-1; the first comment in Form Letter D would be D 1-1; the first comment in Support Card 1 would be Sup 1-1; the first comment in Individual Letter 1 would be Ind 1-1; the first comment in Late Letter 1 would be Lt 1-1; and the first comment in the DEIR Meeting transcript would be Meet-1. The response to each comment will reference the comment number.

3. Revisions to the DEIR Text

Chapter 3 summarizes minor changes made to the DEIR text since its release.

4. Mitigation Monitoring and Reporting Program

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the EIR for the proposed project.

2. Responses to Comments

2. RESPONSES TO COMMENTS

2.1 INTRODUCTION

The Responses to Comments chapter contains responses to each of the comment letters submitted regarding the proposed project DEIR during the public review period, as well as responses to the verbal comments received at the hearing to receive public comment.

2.2 MASTER RESPONSES

Many of the commenters raised similar concerns. For such concerns, the County has prepared a master response. Through master responses, the County can address the common topics in a comprehensive manner and without duplication in the individual responses. Some of the thematic comments submitted on the DEIR pertain to issues that are not considered significant impacts on the environment under CEQA, as will be discussed in Master Responses 1, 2, and 3. Such issues include administrative issues, social and economic impacts, and responsibilities of the Project Applicant. A number of thematic comments regarding the technical analysis of the DEIR were also submitted and are addressed through the remaining Master Responses presented below.

The responses amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Where revisions to the DEIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final EIR. All new text is shown as <u>double underlined</u> and deleted text is shown as ~~struck through~~.

The changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines, Section 15088.5, recirculation of the DEIR is not required, as discussed in detail in Chapter 1 of this Final EIR.

Master Response 1 - Non-EIR/Administrative Issues

Comments

The CEQA Guidelines frame the scope and focus of review and the extent, nature and scope of responses by a lead agency to comments on a DEIR. This Final EIR addresses both comments pertaining to impacts analyses and acknowledges comments not related to environmental impact and analysis. However, other comments received, continued the commenter's opinion on approval or denial, how the Project could affect the commenter's perceived "quality of life," and/or concerns regarding changes in property value. This section provides a response to these types of comments, which are either general or unrelated to the Project's impacts on the physical environment.

Discussion

15204. FOCUS OF REVIEW

(a) In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on

> the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.
>
> (c) Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Notwithstanding the above guidelines language, CEQA Guidelines section 15204(e) states that these limitations should "not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

Oppose/Support Project

Commenters voiced general opposition to or support for the Project. Often these comments were combined with other general statements about environmental concerns (e.g., air quality, traffic, noise). According to CEQA Guidelines section 15088, "The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment." Thus, when a commenter expresses general concerns like the proposed project would result in "more traffic", "increased air pollution", "effects on water quality", or "increased noise", a specific response is not offered. Rather, the commenter is referred to those sections of the DEIR where the referenced general concern is evaluated in detail. For example, project-related traffic and its effect on the regional roadway network is evaluated in Chapter 4.12, Transportation, of the DEIR. The project-related increase in air quality emissions and their effect on the surrounding environment, including human health, is addressed in Chapter 4.3, Air Quality and Greenhouse Gas Emissions. The potential effects of the project on local hydrology and water quality, including groundwater, are addressed in Chapter 4.8, Hydrology and Water Quality, of the DEIR, and potential impacts related to noise and vibration associated with construction and operation of the proposed project are addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Etc.

The environmental review process provides an impartial evaluation of the environmental impacts should the Project be implemented and not opinions on whether the Project should be approved or denied. The County Planning Department, as the public agency with land use authority, is the primary agency providing information and recommendations on land development to the Planning Commission and Board of Supervisors. The decision-makers, typically the Planning Commission and/or Board of Supervisors, weigh factors outside the scope of the EIR, including public support,

taxes, jobs, economic benefits, and other non-environmental factors, in considering approval of a Project.

Those comments in support/opposition do not concern environmental impacts; therefore, they are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the Project.

Quality of Life

Other comment letters opposed the proposed project because it would allegedly affect the rural nature of the community or otherwise negatively affect residents' perceived current quality of life.

In enacting CEQA, the California Legislature declared policies explaining its intent. Included were:

> Public Resources Code, §21000-21001:
> - The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
> - It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
> - The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
> - Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

The EIR process undertaken by the County has been accomplished in a manner consistent with the CEQA statute and guidelines. CEQA is not a tool to forestall any and all changes to the environment, but rather to establish thresholds and manage such changes accordingly, while meeting the economic requirements and needs of the community.

To this end, the CEQA statute and guidelines confirm that environmental needs must at times be secondary to economic and social needs, and authorized lead agencies, after considering the environmental consequences, to approve projects in spite of one or more significant effects:

> Public Resources Code, §21002:
> The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

Thus, CEQA considers issues related to quality of life and acknowledges that a project may be approved despite environmental effects. The environmental review process focuses on physical impacts to the environment. Therefore, quality of life comments are hereby noted and referred to the decisionmakers for consideration in their deliberations for approval or denial of the Project.

Economic Effect on Property Values

Some comment letters questioned whether permitting the Project would reduce property values of surrounding lands. Because CEQA is primarily concerned with physical changes in the environment, economic effects alone do not trigger a finding of a substantial impact under CEQA; "[T]here must be a physical change resulting from the project directly or indirectly before CEQA will apply." Such changes can be direct or indirect. Economic and social impacts of a proposed project "shall not be treated as significant effects on the environment" (CEQA Guidelines §15131(a) (emphasis added). In other words, if a proposed project may cause economic and social consequences, but no significant environmental impacts, CEQA does not require that an EIR be prepared.

The courts have specifically rejected consideration of economic concerns unless the Project's economic impact would cause changes to the physical environment such as blight. For example, courts have held that "the economic impact of small businesses on property values" did not trigger CEQA review in City of Orange v. Valenti (4th Dist. 1974) 37 Cal. App. 3d 240, 249 [112 Cal. Rptr. 379]. Please also refer to Master Response 2.

Where an EIR does identify significant environmental effects, however, related economic and social impacts are not irrelevant. For example:

> CEQA Guidelines, §15131(a):
> "An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic and social changes. The intermediate economic and social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

Indirect off-site impacts associated with the Project are limited; the EIR clearly identifies such effects. There is no evidence that physical effects to other properties would occur that could result in reduction of property values, or that if such reduction in property values happened to occur, such reduced values would result in physical effects subject to CEQA review. Comments regarding the project's potential to affect property values are hereby noted and referred to the decision-makers for consideration in their deliberations for approval or denial of the Project.

Conclusion

Pursuant to the CEQA Guidelines, in reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. When responding to comments, lead agencies need only respond to significant environmental issues. This master response recognizes that many public comments submitted on the Idaho-Maryland Mine DEIR are outside of the scope of CEQA; and thus, do not require a specific response from the County. Nevertheless, this Final EIR includes all comments for the record and review and consideration by the decisionmakers.

Master Response 2 - Social and Economic Impacts

Comments

Select comments submitted on the DEIR state that the project would result in social or economic impacts, such as potentially having an effect on neighboring property values.

Discussion

The scope of an EIR is limited to a local agency's evaluation of potentially significant environmental impacts of a project, which by definition are limited to physical conditions, rather than social or economic conditions. (Pub. Res. Code § 21060.5; CEQA Guidelines § 15360.) The analysis of social or economic impacts unrelated to a physical change is not included within an EIR because such potential impacts are not considered to be effects on the environment. (CEQA Guidelines §§ 15064(e), 15131(a), 15358(b), 15382.) Therefore, potential social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment, are not substantial evidence of a significant environmental effect. (Pub. Res. Code § 21080(e)(2); CEQA Guidelines § 15064(f)(6).)

California courts have routinely dismissed challenges to projects under CEQA when premised on potential social or economic impacts. (see*, e.g.*, *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 196 [potential effect of project's noise on nearby business's economic viability not reviewable under CEQA]; *Chico Advocates for a Responsible Economy v. City of Chico* (2019) 40 Cal.App.5th 839, 846–48 [loss of close and convenient shopping not an environmental issue subject to CEQA review]; *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal.App.4th 833, 840–47 [project's potential economic impacts on costs of providing public services not a cognizable environmental impact under CEQA]; *Maintain Our Desert Environment v. Town of Apple Valley* (2004) 124 Cal.App.4th 430, 446 ["[S]ocial, economic and business competition concerns are not relevant to CEQA analysis unless it is demonstrated that those concerns will have a significant effect on the physical environment."]; *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576–82 [change in community character is a social and psychological impact not reviewable under CEQA].)

More specifically, courts have dismissed CEQA challenges that are based on an assertion that a project will have an adverse impact on nearby property values. For example, in *Porterville Citizens for Responsible Hillside Development v. City of Porterville* (2007) 157 Cal.App.4th 885, neighboring landowners expressed concern that a housing project would have the effect of lowering their property values. The Court of Appeal held that such concerns were not reviewable under CEQA and were not substantial evidence of an environmental effect. The Court confirmed:

> CEQA is not an economic protection statute. Landowners surrounding a proposed project site do not state a valid CEQA concern when they express fears that the proposed project could adversely affect their property value.

(*Porterville Citizens*, 157 Cal.App.4th at 903 [citing *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1205 *and* CEQA Guidelines § 15131(a)].) The California Supreme Court subsequently denied review of the *Porterville Citizens* decision. Therefore, the court's holding remains valid and no CEQA concerns have been raised. Additionally

in *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, the Court of Appeal came to a similar conclusion in evaluating neighboring landowners' claims that a hard rock quarry project would cause economic impacts to their property values because of the potential impact of the mine project on water levels in the landowners' private wells. The Court held that the landowners had raised merely economic and social concerns, the claimed impacts were not physical changes to the environment, and thus the concerns were not evidence to be considered in connection with the environmental review of the project under CEQA. (*Gray*, 167 Cal.App.4th at 1120–21.)

Conclusion
As such, comments concerning potential social or economic effects of the project, when not contributing to, or when not caused by, a physical change to the environment, need not be analyzed or addressed further in this EIR.

Master Response 3 - Operator Responsibility

Comments
The County has received several comments stating that the Project should not be approved due to the past record of Rise Gold and its CEO, Ben Mossman. Specifically, the commenters allege that Rise Gold will fail to comply with its conditions of approval and will operate the mine in an illegal manner, causing harm to the community and the environment.

Discussion
These comments do not raise an issue relevant to CEQA analysis, as the possibility of non-compliance with conditions of approval or mitigation measures is not considered an environmental impact under CEQA. Moreover, the County has ample authority to revoke the Project's permits if the operator does not comply with the required mitigation measures and conditions of approval. The County will also continue to monitor the project through implementation of CEQA mitigation monitoring. Specifically, County Code Section L-II 5.11 states that the County may revoke a use permit or other permit for the following reasons:

1. Non-compliance with conditions of approval, mitigation measures or the approved site plan.
2. Violation of any law in connection with the permit.
3. Expansion of the use or structure without amending the existing permit or receiving a new permit.
4. Operating in a manner that threatens or is injurious to the public health or safety, or constitutes a nuisance.
5. The permit was issued, in whole or in part, on the basis of a misrepresentation or omission of a material statement in the application, or in the applicant's testimony presented during the public hearing, for the permit.
6. Circumstances under which the permit was granted have been changed by the applicant to a degree that one or more of the findings contained in the original permit can no longer be made and the public health, safety, and welfare require the revocation.

As such, in the event that the mine operator fails to comply with its mitigation measures or conditions of approval, the County would initiate proceedings to revoke its permit. If the County revoked the use permit for the mine due to non-compliance with permit requirements, the mine could no longer operate.

While the commenter's concerns are not a CEQA environmental issue for purposes of the EIR, Mr. Mossman provided background information on a discharge incident at a previously operated mine in Canada, which summary is set forth below:

> Benjamin Mossman was a director and officer of Banks Island Gold Ltd. ("Banks"), a company formerly listed on the TSX Venture Exchange that traded under the symbol "BOZ". Banks operated the Yellow Giant Gold Mine (the "Mine") located in British Columbia, Canada. In 2015, unusually heavy rains occurred at the Mine site, which caused an alleged discharge to occur on a small portion of the site. Mr. Mossman was not at the

site at the time the alleged discharge occurred. Further, as soon as Mr. Mossman was made aware of the alleged discharge, he ordered that the incident be reported. Mr. Mossman cooperated with authorities throughout the investigation process.

Despite British Columbia's Chief Inspector of Mines', Al Hoffman, statement that he does not think the discharge is that serious (see Times Colonist, "Yellow Giant Gold Mine Spill Sparks Investigation" (July 29, 2015), https://www.timescolonist.com/news/b-c/yellow-giant-gold-mine-spill-sparks-investigation-1.2015061), Mr. Mossman, Banks, and two other former employees of Banks, were subject to summary conviction proceedings commenced in August 2016 for alleged violations of the British Columbia provincial Environmental Management Act (the "EMA"), the provincial Water Act, and the federal Fisheries Act. The court found Mr. Mossman not guilty and acquitted him of all charges, including pollution-related charges, but found Mr. Mossman guilty of two minor administrative charges. More specifically, Mr. Mossman was only found guilty of charges for failing to call each of the provincial and federal phone numbers (respectively) required to be called when an incident occurred that was required to be called under those statutes. For those two minor offences, the court imposed a $15,000 fine against Mr. Mossman.

Subsequent to the decision, the Crown appealed certain aspects of the trial judge's findings as they related to Mr. Mossman. The summary conviction appeal was heard by the BC Supreme Court in May 2019. In February 2020, the court set aside the two minor convictions against Mr. Mossman, but also ordered a new trial in the matter. The reasons behind the court's order for a new trial related to a disagreement on the admissibility of certain evidence. The new trial has not yet been scheduled but is currently forecasted to start sometime in 2022.

In a separate but concurrent trial involving the same incidents as the first, the Crown charged Mr. Mossman with obstruction of justice related to the investigation of the underlying EMA-related charges. After a full trial, the court acquitted him of that charge on March 6, 2019. More importantly, the Court made affirmative findings of fact that could support innocence in that trial, which included confirmation that Mr. Mossman was not at the site at the time of the alleged discharge and Mr. Mossman ordered that the incident be reported. The Crown did not appeal that acquittal.

It is worthy to note that the Mine is not currently closed for environmental reasons. Rather, the Mine is closed due to a change in Canadian law which effectively requires the Tribal Nation's consent for permitting and operations. The Mine property is now owned by MCC Canadian Gold Ventures, who is currently seeking the consent of the Tribal Nation to reopen the Mine.

Conclusion

Comments related to Rise Gold's past record and concerns that said record suggests the applicant will operate the Idaho-Maryland Mine in an illegal manner are outside the scope of CEQA. Moreover, the County has ample authority to revoke the Project's permits if the operator does not comply with the required mitigation measures and conditions of approval. The County will also continue to monitor the project through implementation of CEQA mitigation monitoring.

Master Response 4 - Cleanup Project is a Separate Project Under CEQA

Comments

The County has received numerous comments asserting that the Idaho Maryland Mine Project ("IMM Project") should be analyzed in combination with the Centennial Industrial Site Clean-Up Project ("Clean-Up Project") as a single project for CEQA purposes. Some of the various

commenters asserted that the Centennial Industrial Site is only being remediated for the purpose of accepting engineered fill from the IMM Project, and that the Idaho Maryland Mine Project cannot proceed without the Clean-Up Project. Accordingly, several commenters argue that the impacts associated with the clean-up project must be analyzed in the EIR for the Idaho Maryland Mine Project. On the Contrary, the Clean-Up Project is a separate Project to remediate site conditions including the presence of lead, asbestos, mercury and other metals, as mandated by the U.S. EPA.

Discussion

First, as a preliminary matter, the Idaho Maryland Mine Project is designed to proceed whether the DTSC clean-up project is completed or is not completed. If the DTSC clean-up project is completed, the Project is designed such that engineered fill will be transported to the Centennial Industrial Site and used to create useable land for future uses consistent with the applicable zoning. Conversely, if the DTSC clean-up project is not completed within the life of the Project, rock material from the Project that would have been transported to the Centennial Industrial Site, instead would be sold in the regional market as construction aggregate.

Second, the Clean-Up Project is a separate project from the IMM Project that is independently necessary to remediate site conditions caused by historic operations on the Centennial Industrial Site. The reason for the Clean-Up Project was the identification of the Centennial Industrial Site by the U.S. EPA as potentially requiring environmental cleanup and the later coordination between the property owner and the DTSC to implement a remedial action plan to remediate lead, arsenic, mercury and other metals found onsite. The U.S. EPA first performed a preliminary analysis on the Centennial Industrial Site in June of 2002, nearly two decades before the IMM Project was proposed, and before the IMM Project Site was owned by the current owner. Based on the report from 2002, the U.S. EPA recommended that further assessment was necessary under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The U.S. EPA subsequently performed additional assessments of the Centennial Industrial Site in 2005, 2011, 2018 and 2019. Discussions regarding cleanup of the Centennial Industrial Site began between the U.S. EPA, the DTSC and the site owner prior to any application for the IMM Project having been submitted. As the Centennial Industrial Site has been targeted by the U.S. EPA for cleanup since 2002, and discussions regarding cleanup of the Project site were well underway before the IMM Project application was submitted, statements from commenters that the Project is merely a component of a larger plan to develop an underground gold mine (the IMM Project), is factually incorrect. Third, the Clean-Up Project is under the authority of the California Department of Toxic Substances Control.

Case Law Supports the Separation of the Current Project and the Clean-Up Project for CEQA Purposes

California courts do not consider distinct activities as one CEQA project required to be reviewed together, except in two situations: 1) When the purpose of the project under review is to provide the necessary first step toward a larger development; and 2) When development of the project under review requires or presumes completion of another activity. (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223). Further, California courts have been clear that even related projects are not required to be analyzed as one project where each project has independent utility, serves a different purpose, or can be implemented independently from the completion of the related activity. (Id. at pp. 1223-1224, citing *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 99 [refinery upgrade and construction of pipeline exporting excess hydrogen from upgraded refinery were "independently justified separate projects with different project proponents"]; *Planning & Conservation League v.*

Castaic Lake Water Agency (2009) 180 Cal.App.4th 210, 237 [water transfer had "significant independent or local utility" from broader water supply agreement, and would be implemented with or without it]; *Sierra Club v. West Side Irrigation District* (2005) 128 Cal.App.4th 690, 699 [two water-rights assignments to city were "approved by different independent agencies" and "could be implemented independently of each other].)

The Clean-Up Project and the IMM Project each have independent utility, each serve a different purpose, and each can be implemented independently from the completion of the other. The utility and purpose of the Clean-Up Project is to ensure timely and efficient cleanup of the Centennial Industrial Site due to existing site conditions, and is required under both California and federal environmental regulations—not because it would benefit the IMM Project. The separate Clean-Up Project is necessary whether or not the IMM Project is approved by Nevada County. Consequently, under the holding in Banning Ranch, the Clean-Up Project should be analyzed separately from the IMM Project under CEQA. (see Banning Ranch, supra, at pp. 1223-1224.)

Conversely, the utility and purpose of the IMM Project is to allow for exploration and development of underground natural resources, and the IMM Project does not help nor hinder the environmental cleanup of the Centennial Industrial Site proposed as a separate DTSC project. The IMM Project's option to place engineered fill on the Centennial Industrial Site is not for environmental cleanup purposes, but for the purpose of creating usable industrial land on that property and for disposal of waste rock from the underground mine. While it is true that if the Clean-Up Project is not approved by the DTSC, the waste rock from the IMM Project cannot be placed on the Centennial M-1 property, the IMM Project can nonetheless proceed. As such, the IMM Project also satisfies the holding in Banning Ranch, such that it has independent utility, serves a different purpose, and can be implemented independently from the completion of the Clean-Up Project. Accordingly, the Clean-Up Project should be reviewed separately from the IMM Project under California law.

Notably, California courts have already addressed a similar situation relating to environmental cleanup activities that were not yet completed but were assumed to be completed prior to a development project on Treasure Island within San Francisco. (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036.) In *Citizens for a Sustainable Treasure Island*, San Francisco approved a project that included "a new, mixed-use community, including up to 8,000 residential units … up to 140,000 square feet of new commercial and retail space; up to 100,000 square feet of new office space; restoration and reuse of historic buildings on Treasure Island; about 500 hotel rooms; public utilities; 300 acres of parks, playgrounds, and public open space; bike and transit facilities; and a new ferry terminal and intermodal transit hub." (Id. at 1044.) The project site (Treasure Island) in that case was known to have extensive contamination with hazardous materials; however, cleanup had not yet been completed at the time of that project's approval. (Id. at 1056.) As stated by the court, "the 'operating assumption' is that the Navy will complete the cleanup before the property is conveyed to the City." (Id.)

However, the appellant in *Citizens for a Sustainable Treasure Island* asserted that the EIR in that case was deficient because it "provides no project-level details as to precisely where, when or to what extent [remediation] activities may be required … [and that the] City unlawfully deferred the development and adoption of mitigation measures for significant, adverse impacts resulting from the disturbance of contaminated soil and groundwater...." (Id. at 1057.) The Appellant did not prevail and the Court rejected these claims. The court ultimately concluded that the EIR in that case was adequate and had appropriately relied on an assumption that the Navy would clean up the site consistent with applicable laws and regulations. (Id. at 1060.) Further the court rejected

the argument that the EIR in that case was required to specifically analyze the clean-up activities under the separate authority of the Navy. (Id. at 1056-1061.) Similar to the situation in *Citizens for a Sustainable Treasure Island,* the Idaho Maryland Mine Project's DEIR identifies the separate clean-up project, acknowledges that the clean-up project is under the authority of the DTSC and reasonably concludes that such cleanup would be completed prior to implementation of the Project on the Centennial Site. Further, taking an even more conservative approach than the EIR in *Citizens for a Sustainable Treasure Island,* the Project's DEIR acknowledges that Project activities would not be allowed on the Centennial Site if the DTSC cleanup project is not completed. [Draft a Conclusion]

Use of Electric Vehicles to Haul Engineered Fill Should It Be Necessary to Transport Fill to Locations other than Centennial Prior to 2033

Several commenters argued that the DEIR did not adequately address the Project's air quality impacts that would occur in the situation where the Centennial Site clean-up is not completed within the life of the Project and sale of waste rock and sand tailings were to occur sooner than anticipated. The DEIR analyzed the impacts of off-site hauling of rock material to the construction aggregate market, starting in 2033; however, it was assumed that prior to 2033, rock material would be placed on the Brunswick engineered fill pile and Centennial Site engineered fill pile. Based on public comments regarding the air quality and GHG impacts associated with hauling of rock material to construction aggregate purchasers earlier than anticipated, the applicant has agreed to a condition of approval that would require the applicant to use electric trucks for any offsite sale or transport of waste rock or sand tailings from the Brunswick site (other than to the Centennial Site) if such transport occurs prior to 2033. Hauling of material to offsite locations for use as construction aggregate starting in 2033 was already assumed in the DEIR's analysis; thus, the emissions impacts associated with this activity are already included in the DEIR, regardless of whether the Centennial Site is available for placement of fill material. The below condition would ensure that the Project would not have greater air quality and GHG emissions impacts than analyzed under the DEIR even if the Centennial Site is not available for placement of engineered fill. The text of the condition of approval is provided below:

> In the event that sand tailings or waste rock material is transported from the Brunswick Site prior to 2033 to locations other than the Centennial Site, all transport of such material shall be accomplished using electric vehicles.

Conclusion

The Clean-Up Project is a separate project from the IMM Project that is independently necessary to remediate site conditions caused by historic operations on the Centennial Industrial Site. The Idaho-Maryland Mine Project is designed to proceed whether the DTSC clean-up project is completed or is not completed. This Final EIR demonstrates that, should it be necessary to transport engineered fill to locations other than the Centennial Site prior to 2033, additional air emissions would not result from such hauling activities, as only electric haul vehicles would be utilized.

Master Response 5 - Evacuation Zones

Comments

Several commenters asserted that the Project's traffic, in particular haul trucks, could have impacts related to substantially impairing emergency evacuation of the areas surrounding the project sites, particularly in the event of a wildfire.

Discussion

These concerns are related to Appendix G Section IX(f) and Section XX(a). The DEIR evaluates these topics in Impacts 4.7-4 (Hazards) and 4.13-1 (Wildfire). As discussed below, project traffic and project employee vehicles exiting the project site during a mandatory evacuation represent a small percentage of existing traffic on the relevant evacuation routes, would be subject to the same traffic controls, and therefore would not cause any impact to the community's use of evacuation routes.

Available Evacuation Routes

The Brunswick Industrial Site is located in evacuation Zone NCO-E188 and the Centennial Industrial Site is location in Zone GRS-E222 (see Map 4 of Evaczonemaps).

The Centennial Site would only have 4 employees onsite for approximately 5 years of the project life. Given the insignificant number of employee vehicles the Centennial site is not discussed further in the regards to a potential wildfire evacuation.

The Brunswick Site is located at the junction of Brunswick Road, E. Bennett Road, and Greenhorn Road. Commenters have expressed concern about employees at the Brunswick Site interfering with a potential evacuation of residents living east of the project in the Greenhorn Road area. These areas are in Zones NCO-E189 (see Map 4) and Zone NCO-E184 (see Map 6). Approximately 810 parcels are located in this area (see Figure 1 and Table 1 below). There are two roadways from which residents could evacuate; westbound via Greenhorn Road to the intersection of Greenhorn, Brunswick, and East (E.) Bennett Roads (see Figure 2 below) or northbound via Jones Ridge Road to Banner Lava Cap Road (see Figure 3 below).

Evacuation via Jones Ridge Road routes traffic away from the project site and numerous routes to the highway are available once vehicles reach Banner Lava Cap Road including:

1) West on Banner Lava Cap Road to highway
2) West on Banner Lava Cap Road, West on Idaho-Maryland Road, North on Brunswick Road to highway
3) East Banner Quaker Hill Road, West on Quaker Hill Cross Road, West on Red Dog Road to highway

Any evacuation from Banner Mountain would also have access to these routes (see Figure 4 below).

Project Traffic Along Evacuation Routes

The only possible interference from the project's traffic would be on the segment of Brunswick Road if evacuees chose this route. Project traffic on Brunswick Road would be from trucking (6:00AM to 10:00PM) and employees during shift change. One-way truck trips would average 50 per day with a maximum of 100 per day. (see DEIR p. 3-26.) Over 16 hours, this equates to a truck passing through Brunswick Road, in either direction, approximately 6 times per hour on average. The normal volume of traffic on this roadway from 6:00AM to 10:00PM ranges from approximately 100 to 1,300 vehicles per hour and is typically 1,000 or more vehicles per hour from 7:00AM to 6:00PM (see pages to 431 - 458 of Appendix O to the DEIR). Therefore, the project truck traffic accounts for only approximately 1% of typical traffic. Approximately 20% of employees are estimated to use this segment of Brunswick Road (see Figure 6a of Appendix O to the DEIR). The largest shift change is at 7:00AM on weekdays where a total of 174 employees would be coming to or leaving from work and 35 vehicles could pass through this segment of Brunswick Road at that time. Typical traffic in this half hour is approximately 375 vehicles and

therefore employee traffic would make up less than 10% of traffic during the weekday morning shift change. During the 3:30PM weekday change approximately 8 employee vehicles would use this road segment with existing traffic of around 300 vehicles in that 15-minute period. If regular traffic were interfering with an evacuation from Banner Mountain or from the Greenhorn area via Jones Ridge Road, local authorities would implement traffic control. In such a situation, the project traffic, which is a small percentage compared to existing traffic, would also be redirected to minimize interference.

In a situation where a fire to the east of the Greenhorn area required all persons in the area to evacuate west via Greenhorn Road, the traffic from 810 parcels would be routed to the Greenhorn Road/ Brunswick Road/ E. Bennett Road intersection. This intersection is adjacent to the Brunswick Site. Regular traffic at this intersection is 1,200 vehicles per hour during the PM peak hour (see page 302 of pdf document of Appendix O to the DEIR – Intersection Turning Movement Count PM PEAK HR VOL). The number of vehicles from 810 parcels during a mandatory evacuation would be similar to routine peak hour traffic (1,200 vehicles per hour) at this intersection. If it were necessary, local authorities would implement traffic control at this intersection which would increase throughput as the all-way stop would no longer be required.

Project vehicles would not interfere with evacuation traffic because those project vehicles would be subject to the same emergency traffic controls as all other traffic. Furthermore, the project has exits on both Brunswick Road and E. Bennett Road which allows outgoing traffic to bypass this intersection. It would be highly unlikely that the mine site and Greenhorn area were subject to a mandatory evacuation order at the same time and the Greenhorn area could not use Ridge Road as an evacuation route. However, if this situation occurred the employees at the site (a maximum of 107) have access to 3 routes (northbound and southbound on Brunswick Road and westbound on E. Bennett Road). These 107 vehicles would take minimal time to exit the site and provide little to no interference with persons coming from the Greenhorn area, which are limited to the capacity of Greenhorn Road until they reach the Greenhorn Road/ Brunswick Road/ E. Bennett Road intersection.

Furthermore, if necessary, as noted in the DEIR (p. 4.13-17), in the event of an evacuation order in the vicinity of the proposed mine, such as an evacuation of residents off of Greenhorn Road, the incident command center could contact dispatch and direct them to contact the mine and request the mine operator to shut down the mine and cease all truck hauling operations. Generally, the Nevada County Regional Dispatch Center will have a 24-hour emergency contact for the mine. This information would also exist in the Emergency Action Plan for the mine, a copy of which will be provided to the Dispatch Center and County OES.

Conclusion

The DEIR adequately evaluated the project's potential to substantially interfere with emergency evacuation of the surrounding communities. Based on the limited project traffic volumes, available evacuation routes, and standard emergency procedures, the project would not have a significant impact related to substantially interfering with emergency evacuation.

References

https://readynevadacounty.org/evaczonemaps

https://community.zonehaven.com/?latlon=39.21095166217373,-120.98499778840295&z=13.027353902085414&selected=US-CA-XNE-NCO-E189&zoneDetails=true

Figure 1
Parcels in the Greenhorn Area

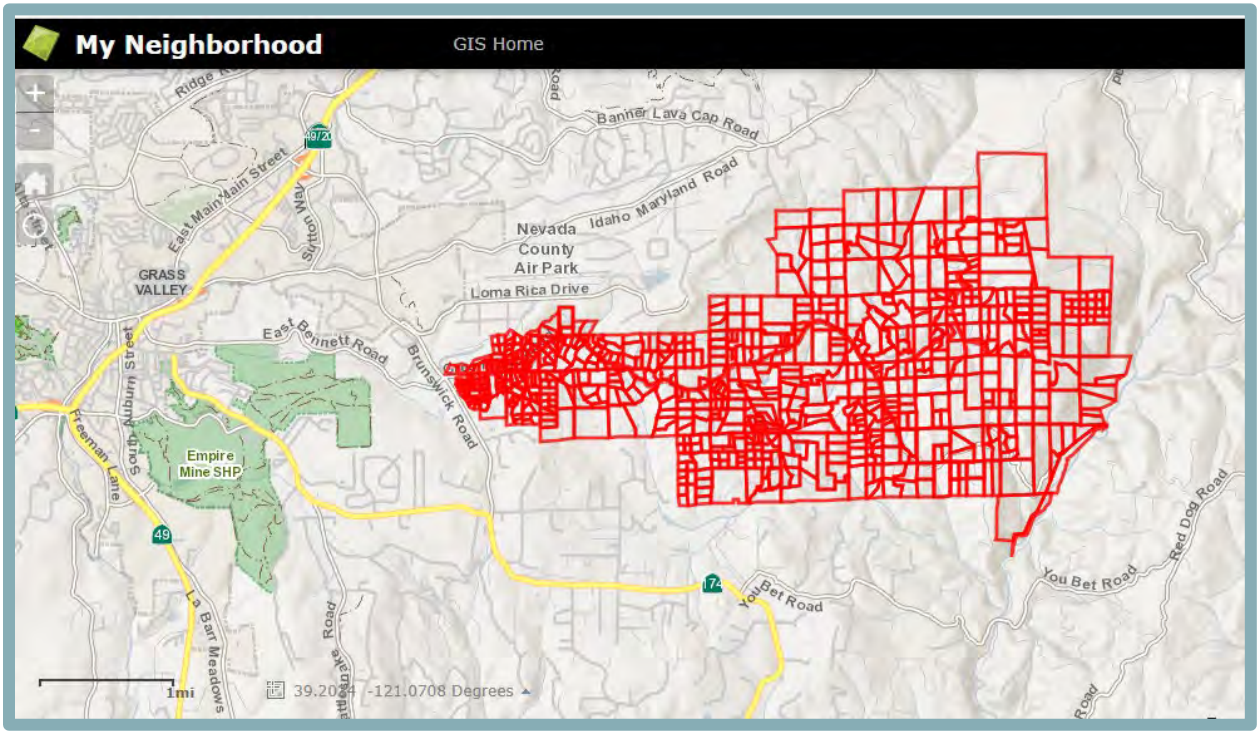


Figure 2
Route along Greenhorn Road

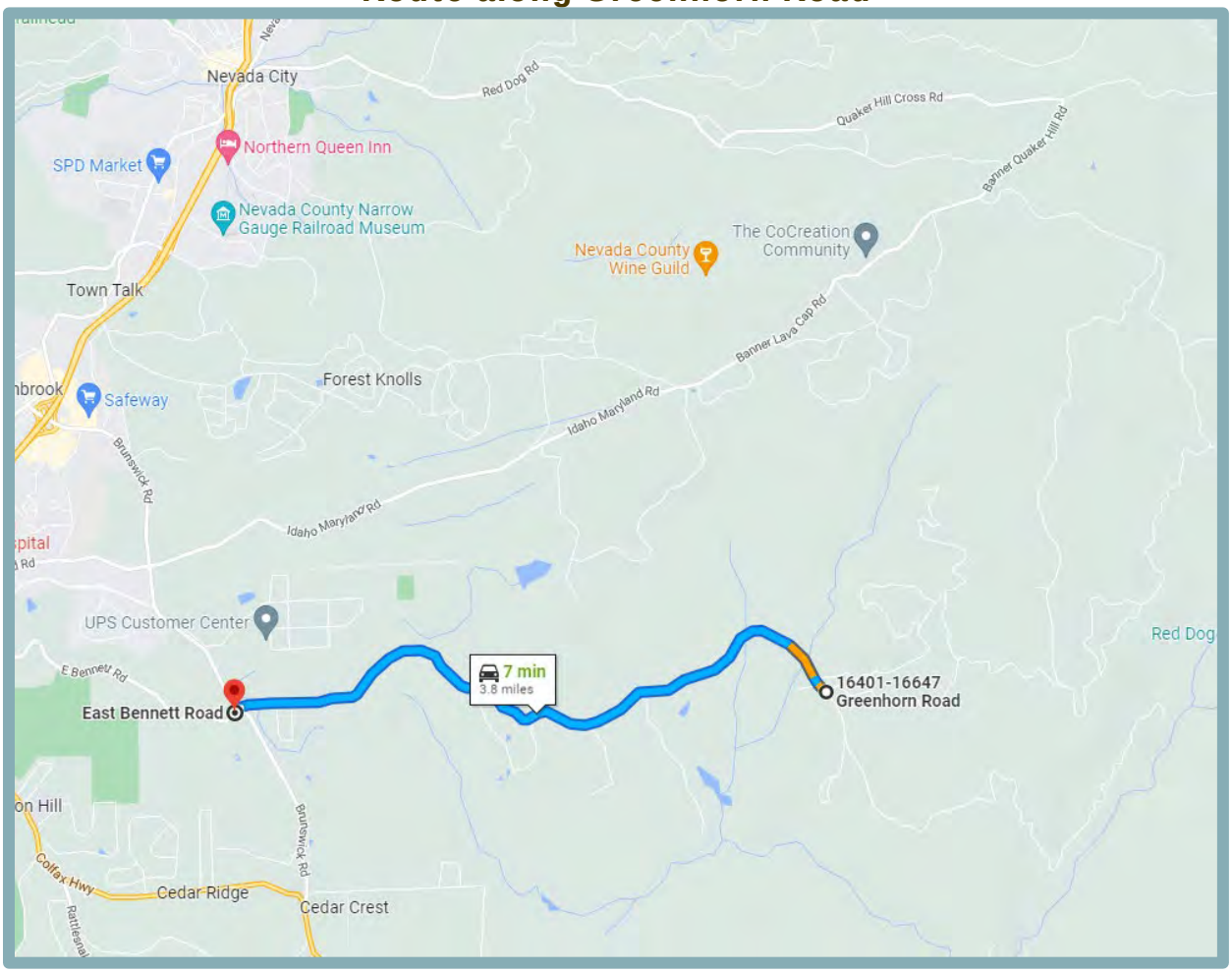


Figure 3
Route along Jones Ridge Road

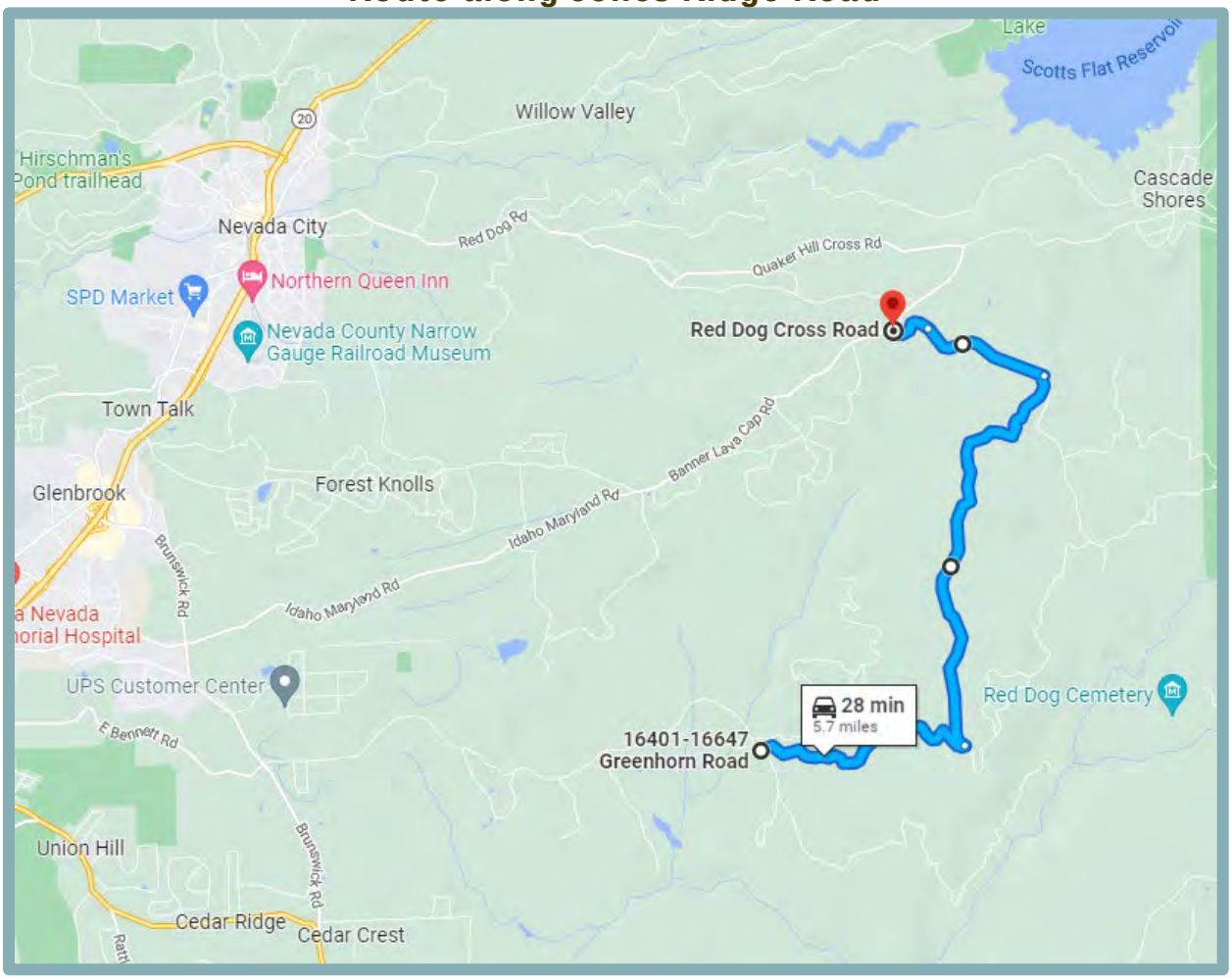


Figure 4
Routes to highway from Banner Mountain

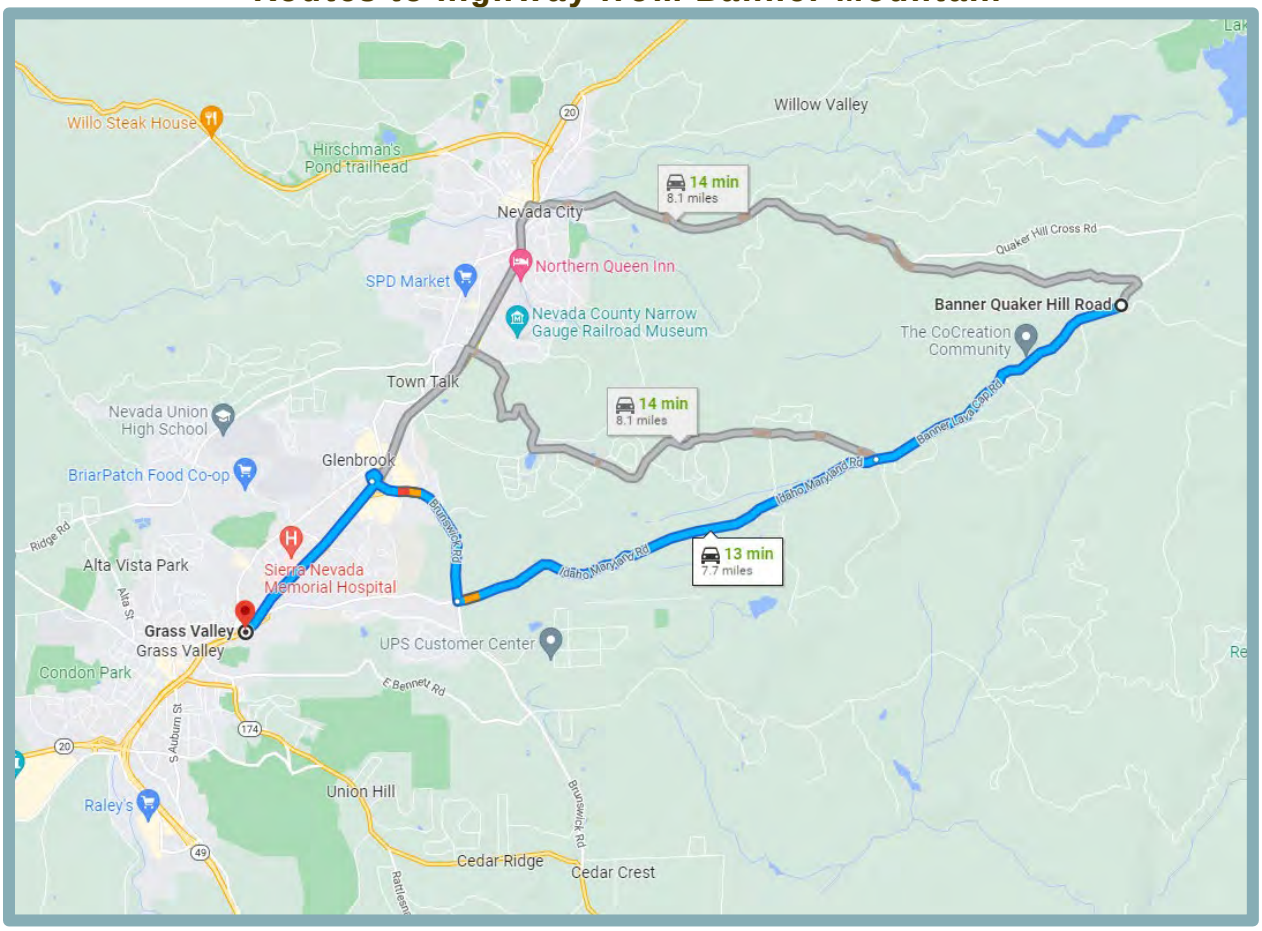


Table 1
Parcels in Greenhorn Area

	APN	Site Address	Assessed Acreage
1	006-830-051	14708 LA NORIA COURT	5.79
2	039-210-003	17046 PINE PEAK ROAD	4.86
3	039-200-070	16726 GREENHORN ROAD	2.5
4	006-820-019	14076 GLENN PINES ROAD	3.1
5	038-360-039	16435 MEADOW WAY	4.49
6	006-790-020	14384 ANCHOR LANE	3.2
7	038-440-019	17721 KNOLL TOP DRIVE	35.91
8	039-180-046	13315 MANION CANYON ROAD	8.45
9	006-830-052	14444 LA NORIA COURT	6
10	039-170-024	12354 HOPPY HOLLOW ROAD	1
11	006-820-028	13595 GREENHORN ROAD	1.81
12	039-190-086	14221 MURPHY PLACE	4.59
13	039-180-009	13490 CAMPBELL LOOP	19.9
14	006-790-001	13101 GREENHORN ROAD	1.4
15	006-820-017	14119 LIQUIDAMBAR LANE	1.29
16	038-350-009	16456 JONES RIDGE ROAD	5.18
17	039-230-052	12914 LOST LAKE ROAD	2.4
18	006-830-041	12637 HONEYDEW LANE	9.43
19	039-221-014	13718 RACCOON MOUNTAIN ROAD	5.18
20	039-170-081	14786 CRAIG LANE	4.94
21	038-440-027	18855 GREENHORN ROAD	7.32
22	039-180-048	14279 RYANS RANCH ROAD	2.33
23	039-170-060	14885 CHRISTMAS TREE LANE	5
24	039-200-002	12545 HOPPY HOLLOW ROAD	10.02
25	006-830-040	12680 HONEYDEW LANE	4.92
26	006-840-032	13407 SAFFRON DRIVE	5.17
27	006-441-015	13173 OMEGA COURT	2
28	006-441-022	13217 OMEGA COURT	1.75
29	006-720-040	13030 HOLLY BRANCH COURT	0.62
30	006-820-055	13548 GREENHORN ROAD	0.08
31	039-221-062	12697 ANVIL ROAD	2.22
32	039-210-057	17432 GREENHORN ROAD	10.02
33	006-790-045	14346 ANCHOR LANE	1
34	006-840-031	13305 ANVIL ROAD	5.17
35	039-230-054	12899 ANVIL ROAD	8.37
36	039-170-070	15102 GREENHORN ROAD	3.82
37	038-450-019	17631 GREENHORN ROAD	5.74

38	006-790-047	13231 LOWER ANCHOR LANE	2.11
39	012-800-003	N/A	7.8
40	006-410-068	13627 CALL OF THE WILD LANE	15.09
41	039-200-037	16380 PINE KNOLL ROAD	2.04
42	006-830-046	12351 DOGWOOD LANE	2.82
43	039-190-089	14011 CAMP ROAD	2.42
44	006-820-035	13315 GREENHORN ROAD	5
45	038-360-052	16979 RIDGE RANCH ROAD	4.44
46	039-230-055	13111 TRIO COURT	2
47	006-790-040	14528 LITTLE HILL LANE	3.05
48	039-221-054	12400 GOLD STARR LANE	2.01
49	039-210-013	17150 GREENHORN ROAD	29.66
50	039-221-026	12876 LOST LAKE ROAD	1.85
51	006-820-056	13564 GREENHORN ROAD	0.13
52	006-840-048	13235 ANVIL ROAD	10.84
53	039-230-023	13640 AXLE COURT	2
54	039-190-039	14495 MANION CANYON ROAD	4.91
55	038-360-060	17055 PIONEER RIDGE ROAD	4.19
56	039-170-023	15895 GREENHORN ROAD	20.15
57	039-200-008	15158 JULIA RANCH ROAD	19.99
58	006-820-038	14194 ANCHOR LANE	0.43
59	006-820-020	14046 GLENN PINES ROAD	1.5
60	039-210-054	17556 GREENHORN ROAD	20
61	006-790-026	14551 LITTLE HILL LANE	3
62	039-170-007	14441 BELLE STARR ROAD	5
63	039-200-072	18110 OHANA WAY	9.64
64	039-200-014	14969 JULIA RANCH ROAD	10.1
65	006-820-008	14006 LIQUIDAMBAR LANE	1.5
66	039-160-032	14315 BELLE STARR ROAD	10.07
67	039-190-025	13928 MANION CANYON ROAD	4.97
68	038-440-009	17767 KNOLL TOP DRIVE	9.9
69	006-830-024	14217 LA NORIA COURT	1.2
70	039-221-013	13793 RACCOON MOUNTAIN ROAD	5.62
71	039-210-018	17475 GREENHORN ROAD	10.13
72	006-710-020	14249 TIM BURR LANE	0.51
73	038-440-030	19218 GREENHORN ROAD	5.94
74	039-221-063	10818 GUNSMOKE ROAD	15.52
75	039-160-008	14446 OTT WAY	10.07
76	038-440-021	17895 KNOLL TOP DRIVE	1.2
77	039-170-049	15435 GREENHORN ROAD	3.62

78	006-790-042	14350 LITTLE HILL LANE	2.09
79	039-190-059	14238 RENMAR COURT	2.83
80	039-190-051	16190 GREENHORN ROAD	2.16
81	039-190-049	16928 LOG CABIN TRAIL	4.71
82	038-350-032	16312 JONES RIDGE ROAD	6.49
83	006-710-025	14296 TIM BURR LANE	1.05
84	006-830-064	12728 BACCARAT COURT	6.4
85	039-230-018	13100 LOST LAKE ROAD	2.9
86	039-170-042	14242 PEACEFUL PINES COURT	4.96
87	039-200-032	18993 JONES RIDGE ROAD	5.02
88	038-440-038	17093 MEADOW WAY	20.17
89	039-230-075	13195 JUPITER DRIVE	1.67
90	006-410-050	14078 GREENHORN ROAD	2.74
91	039-190-052	16178 GREENHORN ROAD	1.75
92	006-410-049	14010 GREENHORN ROAD	2
93	006-700-050	14414 TIM BURR LANE	0.64
94	006-830-067	12638 HONEYDEW LANE	5.18
95	039-221-031	12696 RODRIGUEZ COURT	3.13
96	039-230-041	13000 ECHO GLEN ROAD	7.14
97	039-200-043	15498 PINE KNOLL COURT	2
98	038-450-011	16305 SISLEY COURT	10.06
99	006-820-012	13130 GREENHORN ROAD	2
100	006-820-029	13549 GREENHORN ROAD	1.3
101	039-180-028	13287 GRIZZLY TRAIL	10.06
102	039-221-060	12641 ANVIL ROAD	1.53
103	039-130-013	14520 DEEP CREEK ROAD	31.92
104	006-441-033	12440 THE HOLLOW	15.06
105	039-170-059	14801 CHRISTMAS TREE LANE	3.97
106	039-190-045	14132 MANION CANYON ROAD	1.51
107	038-360-067	17231 SUNSET MOUNTAIN PLACE	4.91
108	006-820-059	14027 LIQUIDAMBAR LANE	2.6
109	006-410-053	12035 DOGWOOD ROAD	2.32
110	039-210-036	17405 GREENHORN ROAD	4.94
111	038-440-012	15515 NIELS MEADE DRIVE	2.38
112	038-360-079	17540 JONES RIDGE ROAD	5.44
113	039-190-015	16276 GREENHORN ROAD	2.1
114	006-410-069	13716 KENSINGTON KOURT	3.52
115	006-710-022	14282 STAR DRIVE	0.99
116	039-230-028	13105 JUPITER DRIVE	5
117	039-230-072	13045 JUPITER DRIVE	2.83

118	006-790-005	13140 LOWER ANCHOR LANE	0.68
119	038-360-069	17100 SUNSET MOUNTAIN PLACE	4.6
120	039-210-047	15011 LITTLE GREENHORN ROAD	9.04
121	006-790-023	14311 LITTLE HILL LANE	3.2
122	038-440-015	17934 KNOLL TOP DRIVE	1.98
123	039-170-065	11855 TENSY LANE	5.03
124	039-190-066	14149 CAMP ROAD	4.3
125	006-441-010	13289 LOWER ANCHOR LANE	1.75
126	039-221-050	12630 BLACKBERRY TRAIL	2
127	038-360-055	17736 JONES RIDGE ROAD	5.76
128	006-820-053	14023 GLENN PINES ROAD	1.76
129	039-221-012	13792 RACCOON MOUNTAIN ROAD	6.13
130	039-221-041	12506 LOST LAKE ROAD	5.01
131	039-170-090	13908 TOBY TRAIL	10.19
132	039-190-081	13785 MANION CANYON ROAD	2.44
133	038-360-068	17156 SUNSET MOUNTAIN PLACE	4.86
134	039-150-017	13953 MASADA DRIVE	20.35
135	038-360-029	16646 MEADOW WAY	2.22
136	006-410-060	12074 DOGWOOD ROAD	5
137	006-830-035	12344 BLACKBERRY TRAIL	4.27
138	039-200-053	15507 JULIA RANCH ROAD	5
139	006-720-025	12933 GREENHORN ROAD	0.93
140	038-360-018	11110 SCRUB OAK LANE	2.22
141	039-170-072	14104 PAULS PLACE	1.51
142	038-440-011	15621 NIELS MEADE DRIVE	9.99
143	038-360-016	16880 FRITILLARY WAY	17.78
144	006-710-029	14334 TIM BURR LANE	0.5
145	039-221-045	13100 TRIO COURT	7.93
146	038-440-013	15530 NIELS MEADE DRIVE	4
147	039-190-094	14221 RENMAR COURT	3.79
148	006-700-037	14372 TIM BURR LANE	0.58
149	039-230-045	13105 ALDERPOINT	8.21
150	039-210-046	17228 MISTY GREEN COURT	10
151	039-190-074	14594 MILL CREEK LANE	7
152	006-441-009	14149 CHRISTOPHER ROBIN WAY	2
153	006-820-007	13966 LIQUIDAMBAR LANE	1.5
154	039-170-011	13841 TOBY TRAIL	2.51

155	039-221-048	12710 BLACKBERRY TRAIL	2
156	039-170-080	14844 CRAIG LANE	4.95
157	038-440-034	17655 JONES RIDGE ROAD	10.04
158	006-790-025	14592 LITTLE HILL LANE	1.5
159	006-840-033	13473 SAFFRON DRIVE	5.17
160	039-221-003	12430 HOPPY HOLLOW ROAD	10.56
161	039-170-091	13955 TOBY TRAIL	32.89
162	006-790-030	14471 ANCHOR LANE	4.72
163	039-130-010	13181 GRIZZLY TRAIL	27.17
164	006-840-060	15570 MOUNT VERNON DRIVE	2
165	006-840-049	13226 ANVIL ROAD	4.66
166	039-190-038	16038 FLYING CLOUD DRIVE	6.1
167	039-170-085	14480 CRAIG LANE	4.95
168	038-440-017	17456 KNOLL TOP DRIVE	9.93
169	039-221-010	13916 RACCOON MOUNTAIN ROAD	5
170	039-170-084	14536 CRAIG LANE	4.95
171	006-391-015	13034 GREENHORN ROAD	1.5
172	006-830-055	14147 GREENHORN ROAD	1.19
173	006-820-015	14107 LIQUIDAMBAR LANE	0.58
174	039-200-075	N/A	5.03
175	039-180-055	17194 SWEETWATER TRAIL	6.28
176	006-700-034	14358 STAR DRIVE	0.5
177	039-200-057	16805 PINE PEAK ROAD	5
178	038-360-020	16698 FRITILLARY WAY	2.23
179	039-210-004	17072 PINE PEAK ROAD	2.5
180	006-441-017	13831 CHRISTOPHER ROBIN WAY	3.75
181	006-710-028	14316 TIM BURR LANE	0.5
182	006-830-019	12635 THE HOLLOW	34.84
183	039-230-007	13566 LOST LAKE ROAD	41.27
184	039-230-063	12967 HOPPY HOLLOW ROAD	15
185	006-410-024	13943 GREENHORN ROAD	2.93
186	039-170-058	16011 GREENHORN ROAD	4.01
187	039-170-054	13594 TOBY TRAIL	9.88
188	006-700-039	14393 STAR DRIVE	2.41
189	038-360-051	16829 PIONEER RIDGE ROAD	4.59
190	039-230-068	12999 PEARSON ROAD	12.96
191	006-410-051	14132 GREENHORN ROAD	1.84
192	006-840-059	15484 MOUNT VERNON DRIVE	2
193	006-410-057	12226 DOGWOOD ROAD	2.06

194	039-200-081	16318 PINE KNOLL ROAD	1.97
195	039-210-051	17026 GREENHORN ROAD	12.75
196	006-391-023	12890 GREENHORN ROAD	3.01
197	006-710-012	14207 TIM BURR LANE	0.72
198	006-410-037	13988 DONEGAL LANE	5
199	039-221-001	14210 RACCOON MOUNTAIN ROAD	14.41
200	039-221-073	13760 FAMILY CIRCLE	13.4
201	038-360-034	16525 MEADOW WAY	2.24
202	006-830-063	12692 BACCARAT COURT	5
203	039-180-040	13626 MANION CANYON ROAD	4.14
204	006-720-041	13025 HOLLY BRANCH COURT	0.5
205	038-450-021	17905 GREENHORN ROAD	5.07
206	039-230-078	13174 ALDERPOINT	7.73
207	038-360-074	17300 SUNSET MOUNTAIN PLACE	5.19
208	006-720-043	14278 HOLLYDALE ROAD	0.65
209	006-840-052	14230 ANVIL ROAD	3.15
210	006-830-025	14307 LA NORIA COURT	8.02
211	039-160-033	14194 BELLE STARR ROAD	10.06
212	038-350-018	16275 JONES RIDGE ROAD	20.67
213	039-230-058	12967 LOST LAKE ROAD	2.46
214	006-391-013	12990 GREENHORN ROAD	1.33
215	038-440-008	17661 KNOLL TOP DRIVE	9.86
216	039-170-035	13778 TOBY TRAIL	0.6
217	038-450-010	17627 GREENHORN ROAD	10.04
218	039-200-013	15065 JULIA RANCH ROAD	9.97
219	039-200-012	18615 JONES RIDGE ROAD	0.06
220	038-450-022	17996 GREENHORN ROAD	4.93
221	038-360-037	N/A	2.25
222	039-200-004	16405 GREENHORN ROAD	4.16
223	039-200-051	14941 JULIA RANCH ROAD	6.14
224	039-190-050	14035 MANION CANYON ROAD	5.19
225	038-440-016	17585 KNOLL TOP DRIVE	9.87
226	006-840-053	14300 ANVIL ROAD	3.15
227	006-830-027	14535 LA NORIA COURT	35.81
228	039-230-038	13670 AXLE COURT	2.49
229	039-190-013	16117 GREENHORN ROAD	1.84
230	039-200-054	15171 JULIA RANCH ROAD	5
231	039-210-009	14860 LITTLE GREENHORN ROAD	9.82



232	038-350-013	14103 RYANS RANCH ROAD	12.21
233	006-720-026	14213 STAR DRIVE	0.33
234	039-230-056	12952 ANVIL ROAD	2.16
235	039-221-072	13790 FAMILY CIRCLE	5.03
236	039-180-041	13625 MANION CANYON ROAD	5.33
237	006-410-055	13859 GREENHORN ROAD	7.08
238	006-391-008	14020 DOWNWIND COURT	2.6
239	038-360-040	11323 WALUPA WAY	2.22
240	006-410-023	13955 GREENHORN ROAD	2.57
241	006-830-032	14655 GREENHORN ROAD	2.03
242	006-920-011	13618 KANTORBERY COURT	9.14
243	039-210-034	16942 PINE PEAK ROAD	2.82
244	039-190-085	14221 MURPHY PLACE	14.49
245	038-360-064	16995 JONES RIDGE ROAD	4.85
246	039-170-030	16042 GREENHORN ROAD	0.5
247	039-221-009	13968 RACCOON MOUNTAIN ROAD	5
248	039-170-062	14040 PEACEFUL PINES COURT	4.21
249	006-410-047	13929 FRANCISCAN WAY	1.75
250	039-170-092	N/A	0.09
251	039-180-033	15397 FLYING CLOUD DRIVE	9.71
252	039-190-063	14502 MANION CANYON ROAD	4.95
253	006-720-037	13015 GREENHORN ROAD	0.75
254	006-820-010	14096 LIQUIDAMBAR LANE	1.2
255	038-360-033	17169 JONES RIDGE ROAD	4.35
256	006-391-033	12900 GREENHORN ROAD	1.35
257	006-790-034	14550 ANCHOR LANE	4.79
258	039-180-022	13558 MANION CANYON ROAD	9.49
259	006-820-057	13947 LIQUIDAMBAR LANE	2.4
260	039-170-080	14842 CRAIG LANE	4.95
261	039-190-090	14011 CAMP ROAD	2.54
262	006-391-016	13058 GREENHORN ROAD	1.5
263	039-230-049	13604 AXLE COURT	1.5
264	039-170-052	12140 HOGAN HILL ROAD	4.06
265	006-790-039	14619 ANCHOR LANE	1.5
266	006-720-039	14254 HOLLYDALE ROAD	0.6
267	006-830-058	13933 CORONADO COURT	3.39
268	039-200-065	12323 HOPPY HOLLOW ROAD	4.95
269	039-170-083	14614 CRAIG LANE	4.96
270	006-391-006	13935 DOWNWIND COURT	2
271	006-820-024	13530 GREENHORN ROAD	1.97

272	038-350-033	16312 JONES RIDGE ROAD	2.6
273	039-230-060	13127 TRIO COURT	5
274	038-360-078	17540 JONES RIDGE ROAD	12.77
275	006-840-047	13190 ANVIL ROAD	3.18
276	039-230-053	12968 LOST LAKE ROAD	3.87
277	006-830-066	12600 ANVIL ROAD	5.1
278	039-180-008	14006 MILL CREEK LANE	19.83
279	006-790-022	13203 GREENHORN ROAD	0.42
280	006-710-026	14297 TIM BURR LANE	0.5
281	006-830-068	12469 THE HOLLOW	2.66
282	038-360-026	16486 MEADOW WAY	2.25
283	006-840-010	13340 ANVIL ROAD	4
284	039-230-066	13233 LOST LAKE ROAD	7.82
285	039-170-047	12197 HOGAN HILL ROAD	4.92
286	039-200-068	16696 GREENHORN ROAD	2.72
287	039-190-022	17791 JONES RIDGE ROAD	8.52
288	006-830-044	14663 LA NORIA COURT	25
289	039-230-024	13641 AXLE COURT	2.01
290	039-230-061	12884 HOPPY HOLLOW ROAD	15
291	006-410-042	13894 COLLIER ROAD	5
292	039-221-057	14981 GREENHORN ROAD	2.15
293	006-820-042	13974 GLENN PINES ROAD	1.35
294	038-440-025	18921 GREENHORN ROAD	3.8
295	006-410-024	13939 GREENHORN ROAD	2.93
296	006-830-056	13844 CORONADO COURT	6
297	039-160-025	14495 LAVA CAP MINE ROAD	33.64
298	039-210-042	14556 LITTLE GREENHORN ROAD	4.85
299	039-230-079	13309 LOST LAKE ROAD	3.59
300	039-230-019	13680 AXLE COURT	2.49
301	039-200-076	N/A	5.03
302	039-190-078	14899 BAILOXIE RANCH ROAD	19.25
303	006-720-028	14267 STAR DRIVE	1.32
304	038-450-023	18072 GREENHORN ROAD	5.07
305	006-700-045	14388 STAR DRIVE	0.55
306	039-221-024	12840 RODRIGUEZ COURT	1.85
307	039-230-046	13173 ALDERPOINT	7.09
308	039-190-002	14360 MILL CREEK LANE	2.56
309	006-820-014	14137 LIQUIDAMBAR LANE	1.25
310	006-820-046	12681 LEAF LANE	2
311	038-481-001	16202 JONES RIDGE ROAD	152.89

312	038-360-036	16571 MEADOW WAY	2.23
313	039-170-057	13749 TOBY TRAIL	9.83
314	039-200-045	16806 GREENHORN ROAD	1.81
315	039-190-031	14866 MANION CANYON ROAD	2.97
316	038-360-039	11363 WALUPA WAY	4.49
317	039-221-021	12771 LOST LAKE ROAD	3.74
318	039-230-035	13040 ECHO GLEN ROAD	11.68
319	038-450-016	17670 GREENHORN ROAD	3.82
320	039-200-073	18232 OHANA WAY	10.05
321	006-830-041	12639 HONEYDEW LANE	9.43
322	006-840-058	15515 MOUNT VERNON DRIVE	2
323	039-221-028	12765 RODRIGUEZ COURT	1.84
324	039-200-062	16496 GREENHORN ROAD	0.25
325	006-820-023	13448 GREENHORN ROAD	1.72
326	039-180-034	13886 GRIZZLY TRAIL	10
327	038-440-024	19028 GREENHORN ROAD	14.93
328	006-830-050	14730 GREENHORN ROAD	21.47
329	039-200-091	19131 JONES RIDGE ROAD	5.01
330	039-130-014	N/A	17.82
331	039-190-014	16239 GREENHORN ROAD	5.94
332	039-170-061	14945 CHRISTMAS TREE LANE	5
333	039-200-069	16695 GREENHORN ROAD	0.14
334	006-820-016	14087 LIQUIDAMBAR LANE	0.67
335	039-170-014	13847 TOBY TRAIL	9.34
336	039-200-016	15167 JULIA RANCH ROAD	30.05
337	039-210-035	16981 PINE PEAK ROAD	2.15
338	039-150-034	13816 BELLE STARR ROAD	20.27
339	038-360-023	16524 MEADOW WAY	2.25
340	039-221-025	12835 RODRIGUEZ COURT	1.86
341	006-410-056	14065 YAMA WAY	5
342	006-830-033	14693 GREENHORN ROAD	2.98
343	039-210-027	16889 PINE PEAK ROAD	2.23
344	039-180-054	17215 SWEETWATER TRAIL	8.83
345	006-790-041	14478 LITTLE HILL LANE	3.1
346	006-720-036	13049 GREENHORN ROAD	0.76
347	039-230-077	13058 JUPITER DRIVE	1.67
348	039-221-039	13945 FAMILY CIRCLE	2.5
349	039-200-052	18108 JONES RIDGE ROAD	3.9
350	039-180-045	13970 RYANS RANCH ROAD	10.55
351	006-710-019	14248 TIM BURR LANE	0.54

352	006-840-060	13180 ANVIL ROAD	2
353	039-221-079	12673 HOPPY HOLLOW ROAD	5.48
354	039-200-015	16463 TERRAPAX PLACE	20.06
355	006-790-043	14369 ANCHOR LANE	2
356	038-450-026	18148 GREENHORN ROAD	40.85
357	039-210-006	17018 PINE PEAK ROAD	1.53
358	039-180-032	13923 GRIZZLY TRAIL	10
359	006-710-027	14326 STAR DRIVE	1.99
360	006-710-016	14232 TIM BURR LANE	0.51
361	006-830-039	12634 HONEYDEW LANE	4.96
362	039-230-042	13304 ALDERPOINT	6.19
363	006-441-008	13352 LOWER ANCHOR LANE	4.7
364	039-221-034	13676 FAMILY CIRCLE	3.05
365	039-170-077	15800 GREENHORN ROAD	5.88
366	039-190-019	14149 CAMP ROAD	1.65
367	039-180-012	12444 MANION CANYON ROAD	19.84
368	039-200-049	15552 PINE KNOLL COURT	2.12
369	039-170-027	15285 GREENHORN ROAD	0.33
370	039-170-046	12196 HOGAN HILL ROAD	4.93
371	039-200-050	15553 PINE KNOLL COURT	1.91
372	039-200-067	16616 GREENHORN ROAD	3
373	039-190-084	N/A	2.44
374	038-360-059	17054 PIONEER RIDGE ROAD	5.37
375	039-221-035	15163 GREENHORN ROAD	10
376	039-210-039	17222 SKY OAKS LANE	4.93
377	039-210-031	16943 PINE PEAK ROAD	2.55
378	039-200-031	18934 JONES RIDGE ROAD	5.03
379	038-350-035	16690 JONES RIDGE ROAD	29.88
380	006-820-048	12757 LEAF LANE	2.02
381	006-820-043	13967 GLENN PINES ROAD	2.88
382	039-210-033	15594 POVERTY POND ROAD	4.84
383	039-221-053	12388 GOLD STARR LANE	1.83
384	006-820-049	12975 LEAF LANE	3.42
385	039-230-081	13758 AXLE COURT	4.52
386	006-830-034	12490 ANVIL ROAD	5.89
387	039-190-069	13831 MANION CANYON ROAD	1.45
388	038-360-052	16940 JONES RIDGE ROAD	4.44
389	006-720-024	12901 GREENHORN ROAD	0.43
390	039-170-020	15148 GREENHORN ROAD	4.74
391	038-360-035	16607 MEADOW WAY	2.22

392	039-170-050	15366 GREENHORN ROAD	4.08
393	006-441-023	13907 CHRISTOPHER ROBIN WAY	1.75
394	006-820-052	14065 GLENN PINES ROAD	1.5
395	038-360-014	17100 FRITILLARY WAY	17.26
396	039-180-037	13240 MANION CANYON ROAD	3.33
397	006-710-021	14258 STAR DRIVE	0.5
398	006-410-039	12187 DOGWOOD ROAD	5.9
399	039-221-015	13717 RACCOON MOUNTAIN ROAD	7.01
400	039-200-056	16508 PINE KNOLL ROAD	4.53
401	006-700-040	14285 HOLLYDALE ROAD	16.63
402	038-360-042	16978 JONES RIDGE ROAD	4.49
403	039-190-021	17790 JONES RIDGE ROAD	9.9
404	006-391-012	12966 GREENHORN ROAD	1.33
405	006-700-044	14399 TIM BURR LANE	0.51
406	006-830-037	12604 HONEYDEW LANE	5
407	039-160-029	14515 LAVA CAP MINE ROAD	21.45
408	038-360-062	16949 JONES RIDGE ROAD	4.85
409	039-130-015	N/A	1.06
410	006-700-049	14392 TIM BURR LANE	0.57
411	006-830-047	14556 GREENHORN ROAD	5.68
412	039-221-043	12555 BLACKBERRY TRAIL	6.17
413	039-190-070	13867 MANION CANYON ROAD	1.55
414	039-190-060	14752 MILL CREEK LANE	6.87
415	006-820-045	14108 YAMA WAY	5.56
416	039-200-071	16726 GREENHORN ROAD	0.36
417	006-720-035	13023 GREENHORN ROAD	0.37
418	006-820-039	13203 GREENHORN ROAD	0.23
419	006-710-014	14232 STAR DRIVE	0.5
420	006-410-015	13784 GREENHORN ROAD	1.22
421	039-221-040	15017 GREENHORN ROAD	5.1
422	039-190-009	13913 CAMP ROAD	9.74
423	006-391-032	12894 GREENHORN ROAD	1.59
424	039-170-082	14170 CRAIG LANE	4.96
425	038-450-025	18504 GREENHORN ROAD	5.38
426	039-190-007	13801 MANION CANYON ROAD	4.46
427	039-190-051	14850 BAILOXIE RANCH ROAD	2.16
428	039-130-012	13196 GRIZZLY TRAIL	19.82
429	039-130-011	14510 DEEP CREEK ROAD	19.81
430	006-830-061	12354 DOGWOOD ROAD	5.05

431	006-790-050	14330 ANCHOR LANE	1.62
432	039-221-012	13794 RACCOON MOUNTAIN ROAD	6.13
433	039-221-051	12394 BLACKBERRY TRAIL	1.5
434	039-200-082	16533 GREENHORN ROAD	4.91
435	039-200-092	19069 JONES RIDGE ROAD	5.01
436	039-200-060	18810 JONES RIDGE ROAD	3
437	006-820-012	14168 LIQUIDAMBAR LANE	2
438	039-190-071	15768 FLYING CLOUD DRIVE	21.09
439	038-450-005	18610 GREENHORN ROAD	10.13
440	038-360-010	17033 JONES RIDGE ROAD	4.06
441	038-350-034	16540 JONES RIDGE ROAD	29.91
442	038-360-045	17093 JONES RIDGE ROAD	1.42
443	006-840-051	13320 ANVIL ROAD	2.42
444	006-410-008	13769 GREENHORN ROAD	1.6
445	039-210-036	17144 SKY OAKS LANE	4.94
446	006-391-007	13993 DOWNWIND COURT	2
447	038-360-031	11111 SCRUB OAK LANE	4.4
448	039-230-040	13673 AXLE COURT	2.51
449	039-221-056	12442 GOLD STARR LANE	1.5
450	039-170-066	11915 TENSY LANE	5
451	039-190-060	14674 MILL CREEK LANE	6.87
452	039-190-042	13965 MILL CREEK LANE	2.56
453	006-410-061	12100 DOGWOOD ROAD	2.5
454	006-410-010	13874 GREENHORN ROAD	2.5
455	038-350-014	13971 RYANS RANCH ROAD	7.5
456	038-450-006	18732 GREENHORN ROAD	8.45
457	039-210-002	17044 PINE PEAK ROAD	4.85
458	006-720-034	13009 GREENHORN ROAD	0.36
459	006-710-024	14270 TIM BURR LANE	1.15
460	039-221-032	12628 LOST LAKE ROAD	2
461	006-441-014	13186 OMEGA COURT	2.03
462	006-710-011	14204 TIM BURR LANE	1.53
463	039-210-022	17175 GREENHORN ROAD	9.8
464	038-360-048	17076 RIDGE RANCH ROAD	4.89
465	038-350-031	16691 JONES RIDGE ROAD	1.52
466	039-200-093	16309 PINE KNOLL ROAD	3
467	006-410-044	14057 COLLIER ROAD	2
468	039-200-046	16762 GREENHORN ROAD	1.5
469	006-720-033	12967 GREENHORN ROAD	5.81
470	006-830-054	14375 GREENHORN ROAD	7.09

471	039-170-010	15648 GREENHORN ROAD	2.1
472	039-170-040	13998 PAULS PLACE	2
473	038-360-043	16842 JONES RIDGE ROAD	4.93
474	038-360-027	11271 WALUPA WAY	4.41
475	006-790-008	14440 ANCHOR LANE	0.92
476	006-820-036	13226 GREENHORN ROAD	0.71
477	006-830-016	13550 LOWER ANCHOR LANE	13.86
478	006-830-021	14278 LA NORIA COURT	2.85
479	039-170-053	15284 GREENHORN ROAD	4.78
480	006-720-027	14229 STAR DRIVE	0.83
481	006-830-065	12766 BACCARAT COURT	7.14
482	039-170-048	15351 GREENHORN ROAD	2.49
483	039-170-056	13445 TOBY TRAIL	9.81
484	039-200-034	16458 GREENHORN ROAD	1.4
485	039-221-044	12595 BLACKBERRY TRAIL	10.34
486	039-210-032	15590 POVERTY POND ROAD	4.85
487	038-360-076	17679 JONES RIDGE ROAD	2.2
488	006-790-038	14581 ANCHOR LANE	1.5
489	039-190-077	16814 LOG CABIN TRAIL	6.58
490	006-391-036	12828 GREENHORN ROAD	3.17
491	039-230-030	13360 ALDERPOINT	42.87
492	006-830-048	14602 GREENHORN ROAD	1.5
493	039-200-058	16463 PINE KNOLL ROAD	3.67
494	039-190-082	N/A	2.43
495	006-840-046	15537 MOUNT VERNON DRIVE	3.15
496	039-190-046	14140 MANION CANYON ROAD	3.57
497	038-450-017	17707 GREENHORN ROAD	5.54
498	039-200-042	16791 GREENHORN ROAD	1.5
499	006-391-022	12920 GREENHORN ROAD	2.77
500	038-360-042	16932 RIDGE RANCH ROAD	4.49
501	038-360-017	11050 SCRUB OAK LANE	2.21
502	006-410-041	14095 COLLIER ROAD	5
503	039-190-095	13959 CAMP ROAD	4.07
504	039-210-020	17287 GREENHORN ROAD	19.58
505	039-180-021	13559 MANION CANYON ROAD	2.34
506	039-180-042	13725 MANION CANYON ROAD	3.93
507	039-230-059	13116 TRIO COURT	2
508	039-230-064	12929 HOPPY HOLLOW ROAD	15.81
509	006-820-044	14092 YAMA WAY	5.29
510	006-830-062	12626 BACCARAT COURT	6.46

511	039-221-059	15018 GREENHORN ROAD	0.28
512	039-190-080	14616 MANION CANYON ROAD	10.09
513	039-190-073	14594 MILL CREEK LANE	5
514	039-180-049	14279 RYANS RANCH ROAD	2.26
515	039-190-056	14495 MILL CREEK LANE	12.89
516	006-720-029	14285 STAR DRIVE	0.82
517	006-840-009	13378 ANVIL ROAD	2
518	039-221-030	12816 LOST LAKE ROAD	1.35
519	039-221-017	13628 RACCOON MOUNTAIN ROAD	5
520	039-210-038	17221 SKY OAKS LANE	4.78
521	039-200-063	16621 GREENHORN ROAD	3.41
522	038-440-043	16965 MEADOW WAY	22.04
523	006-700-039	14395 STAR DRIVE	2.41
524	006-441-013	14027 CHRISTOPHER ROBIN WAY	3.75
525	039-230-073	13075 HEIGEN COURT	2.47
526	039-221-023	12877 LOST LAKE ROAD	1.92
527	039-170-044	13947 TOBY TRAIL	1.91
528	039-170-079	14912 CRAIG LANE	4.96
529	038-440-020	15734 NIELS MEADE DRIVE	6.82
530	006-720-031	14315 STAR DRIVE	0.68
531	039-221-029	12778 LOST LAKE ROAD	1.32
532	039-170-025	15519 GREENHORN ROAD	6.2
533	006-820-047	12719 LEAF LANE	2
534	006-820-034	13413 GREENHORN ROAD	3.27
535	006-920-013	13634 VINCENT COURT	5.69
536	006-710-023	14271 TIM BURR LANE	0.5
537	006-410-052	11990 DOGWOOD ROAD	2.52
538	039-200-039	16753 GREENHORN ROAD	1.52
539	006-410-048	13815 FRANCISCAN WAY	4.9
540	006-920-012	13640 KANTORBERY COURT	3.12
541	039-210-043	14752 LITTLE GREENHORN ROAD	4.85
542	038-350-010	16425 JONES RIDGE ROAD	4.05
543	039-221-064	10756 GUNSMOKE ROAD	3.01
544	039-180-023	14290 MILL CREEK LANE	10.68
545	039-230-037	12930 ECHO GLEN ROAD	7.09
546	006-790-001	13103 GREENHORN ROAD	1.4
547	006-820-035	13313 GREENHORN ROAD	5
548	006-710-018	12663 GEM LANE	0.67



549	039-190-076	16920 LOG CABIN TRAIL	3.32
550	039-190-068	13838 MANION CANYON ROAD	1.67
551	006-830-053	14459 LA NORIA COURT	6.27
552	039-210-041	17338 GREENHORN ROAD	4.91
553	039-221-011	13870 RACCOON MOUNTAIN ROAD	5.68
554	006-720-032	14339 STAR DRIVE	1.09
555	006-790-053	14482 ANCHOR LANE	0.63
556	006-820-009	14054 LIQUIDAMBAR LANE	1.5
557	006-840-006	12862 ANVIL ROAD	6
558	006-410-036	13944 DONEGAL LANE	4.5
559	039-200-037	16378 PINE KNOLL ROAD	2.04
560	039-221-019	12627 LOST LAKE ROAD	10.08
561	039-170-009	15891 GREENHORN ROAD	4.64
562	039-190-053	14496 MILL CREEK LANE	15.1
563	039-190-041	13966 MILL CREEK LANE	2.37
564	038-450-027	18100 GREENHORN ROAD	20.11
565	006-710-030	14322 TIM BURR LANE	0.78
566	006-410-070	13755 KENSINGTON KOURT	5.37
567	039-160-036	14044 BELLE STARR ROAD	10.05
568	039-180-047	13315 MANION CANYON ROAD	10.6
569	006-441-020	12748 THE HOLLOW	26.42
570	006-410-065	13864 CALL OF THE WILD LANE	5.03
571	039-221-058	14934 GREENHORN ROAD	6.54
572	039-180-038	13104 MANION CANYON ROAD	7.64
573	006-840-057	15485 MOUNT VERNON DRIVE	2
574	039-221-081	12846 HOPPY HOLLOW ROAD	17.44
575	006-790-048	14285 ANCHOR LANE	0.9
576	006-790-046	13193 LOWER ANCHOR LANE	2.11
577	039-180-039	13233 MANION CANYON ROAD	2.94
578	006-920-011	13620 KANTORBERY COURT	9.14
579	039-210-013	17148 GREENHORN ROAD	29.66
580	006-441-016	13883 CHRISTOPHER ROBIN WAY	2
581	038-450-028	18599 GREENHORN ROAD	22.13
582	006-830-029	14563 GREENHORN ROAD	10
583	006-820-011	14130 LIQUIDAMBAR LANE	1
584	039-160-030	14501 LAVA CAP MINE ROAD	7.99
585	039-170-063	15928 GREENHORN ROAD	4.64
586	006-820-037	13227 GREENHORN ROAD	0.25
587	038-450-024	18578 GREENHORN ROAD	12.45

588	038-360-006	17131 JONES RIDGE ROAD	3.48
589	006-410-040	12278 DOGWOOD ROAD	5.67
590	039-180-001	15594 FLYING CLOUD DRIVE	39.8
591	006-820-022	13935 GLENN PINES ROAD	1.5
592	039-210-050	17022 GREENHORN ROAD	0.56
593	039-180-031	13847 GRIZZLY TRAIL	10.01
594	039-190-018	14184 MANION CANYON ROAD	1.65
595	039-180-019	13503 MANION CANYON ROAD	2.33
596	006-820-005	14138 GLENN PINES ROAD	1
597	006-820-057	13949 LIQUIDAMBAR LANE	2.4
598	006-410-059	12020 DOGWOOD ROAD	2.72
599	006-410-058	12156 DOGWOOD ROAD	2.06
600	006-710-017	12655 GEM LANE	0.64
601	039-221-038	13827 FAMILY CIRCLE	3
602	039-221-052	12432 BLACKBERRY TRAIL	1.81
603	039-170-041	13997 PAULS PLACE	2
604	039-160-034	N/A	10.06
605	039-200-008	18655 JONES RIDGE ROAD	19.99
606	038-440-010	18039 KNOLL TOP DRIVE	9.97
607	006-830-049	14828 GREENHORN ROAD	2.04
608	039-180-043	13747 CAMPBELL LOOP	5.22
609	006-391-009	13936 DOWNWIND COURT	2
610	039-200-010	18690 JONES RIDGE ROAD	10
611	006-720-030	14327 STAR DRIVE	0.66
612	006-790-042	14349 ANCHOR LANE	2.09
613	038-360-019	16734 FRITILLARY WAY	4.49
614	039-230-048	13605 AXLE COURT	1.5
615	039-210-017	17139 SKY OAKS LANE	10.04
616	038-360-056	17646 JONES RIDGE ROAD	3.99
617	039-200-026	16352 GREENHORN ROAD	1.91
618	038-360-024	16691 MEADOW WAY	2.2
619	006-790-002	14277 HOLLYDALE ROAD	1.58
620	038-450-003	18382 GREENHORN ROAD	38.81
621	038-440-031	17457 JONES RIDGE ROAD	20.13
622	039-170-073	14035 PAULS PLACE	5.76
623	038-360-021	16761 FRITILLARY WAY	2.23
624	039-230-074	13074 HEIGEN COURT	2.35
625	039-221-069	13567 RACCOON MOUNTAIN ROAD	3.43
626	006-410-054	11991 DOGWOOD ROAD	2.52
627	006-410-067	13731 CALL OF THE WILD LANE	5.03

628	006-790-021	14232 ANCHOR LANE	1.89
629	038-440-029	19270 GREENHORN ROAD	37.1
630	039-170-051	15472 GREENHORN ROAD	1.67
631	039-221-064	14143 RACCOON MOUNTAIN ROAD	3.01
632	039-221-055	12414 GOLD STARR LANE	1.5
633	039-200-059	18880 JONES RIDGE ROAD	3.21
634	006-840-011	14233 ANVIL ROAD	6.31
635	039-200-077	17000 GREENHORN ROAD	5.03
636	039-180-024	14276 MILL CREEK LANE	16.28
637	039-200-048	15469 PINE KNOLL COURT	2.08
638	039-190-058	14147 MANION CANYON ROAD	2.66
639	039-210-011	17027 GREENHORN ROAD	5.04
640	038-360-081	17366 JONES RIDGE ROAD	1.33
641	039-210-058	17121 SKY OAKS LANE	9.96
642	039-200-017	15235 JULIA RANCH ROAD	10.01
643	039-190-033	14323 RENMAR COURT	5
644	006-720-042	13033 HOLLY BRANCH COURT	0.52
645	039-230-051	12915 LOST LAKE ROAD	2.23
646	006-820-026	13663 GREENHORN ROAD	2
647	038-360-075	17292 SUNSET MOUNTAIN PLACE	4.57
648	038-360-038	16630 FRITILLARY WAY	2.23
649	039-230-076	13106 JUPITER DRIVE	1.67
650	039-221-074	12673 HOPPY HOLLOW ROAD	16.96
651	006-410-033	14017 FRANCISCAN WAY	2.01
652	039-210-040	17314 GREENHORN ROAD	4.95
653	006-790-043	14367 ANCHOR LANE	2
654	006-700-032	14354 TIM BURR LANE	0.66
655	039-160-035	N/A	10.05
656	006-410-021	13951 GREENHORN ROAD	2.86
657	006-920-014	13636 VINCENT COURT	6.3
658	006-790-023	14327 LITTLE HILL LANE	3.2
659	006-820-006	13399 NEVADA CITY AVENUE	2.17
660	039-230-065	13438 LOST LAKE ROAD	14.05
661	039-221-050	12630 BLACKBERRY TRAIL	2
662	039-200-083	16495 GREENHORN ROAD	4.29
663	006-820-043	13955 GLENN PINES ROAD	2.88
664	038-440-002	17644 KNOLL TOP DRIVE	29.83
665	038-440-041	17298 JONES RIDGE ROAD	7.96
666	038-350-029	16645 JONES RIDGE ROAD	56.74

667	039-230-026	13120 LOST LAKE ROAD	5
668	039-190-067	17942 JONES RIDGE ROAD	9.69
669	038-360-053	17744 JONES RIDGE ROAD	5
670	038-360-052	16940 PIONEER RIDGE ROAD	4.44
671	006-391-035	12836 GREENHORN ROAD	2.51
672	006-410-063	14063 GREENHORN ROAD	1.53
673	039-221-033	13760 FAMILY CIRCLE	7.61
674	039-221-049	12670 BLACKBERRY TRAIL	2
675	039-170-037	15863 COON HOLLOW COURT	5.06
676	039-210-037	17143 SKY OAKS LANE	4.9
677	038-360-025	11211 WALUPA WAY	2.2
678	039-210-017	17519 GREENHORN ROAD	10.04
679	006-820-054	13490 GREENHORN ROAD	0.17
680	039-230-071	13022 JUPITER DRIVE	2.37
681	039-160-028	N/A	11.01
682	006-790-036	14395 LITTLE HILL LANE	1.46
683	039-221-020	12695 LOST LAKE ROAD	6.88
684	039-221-004	12544 HOPPY HOLLOW ROAD	14.23
685	039-210-049	17318 MISTY GREEN COURT	10
686	039-200-064	16440 PINE KNOLL ROAD	3.44
687	039-190-004	14003 MILL CREEK LANE	9.93
688	006-820-013	13198 GREENHORN ROAD	1.25
689	039-210-029	17071 PINE PEAK ROAD	2.75
690	006-790-037	14451 LITTLE HILL LANE	1
691	038-360-042	16941 PIONEER RIDGE ROAD	4.49
692	039-221-027	12764 RODRIGUEZ COURT	1.5
693	006-830-069	12469 THE HOLLOW	7.34
694	039-221-042	12582 LOST LAKE ROAD	5.04
695	039-210-008	16905 GREENHORN ROAD	9.25
696	039-200-041	16829 GREENHORN ROAD	3.71
697	039-130-006	13810 GRIZZLY TRAIL	39.79
698	039-200-066	12255 HOPPY HOLLOW ROAD	5.02
699	039-180-029	13461 GRIZZLY TRAIL	10.19
700	006-700-033	14363 TIM BURR LANE	0.68
701	039-210-045	14677 LITTLE GREENHORN ROAD	4.85
702	039-160-006	14373 BELLE STARR ROAD	10.07
703	038-440-018	15566 NIELS MEADE DRIVE	3.62
704	006-410-017	13816 FRANCISCAN WAY	6.41
705	006-830-020	14216 LA NORIA COURT	1.91
706	039-210-012	17103 GREENHORN ROAD	2

707	038-360-063	16805 JONES RIDGE ROAD	4.56
708	006-830-015	13480 LOWER ANCHOR LANE	4.5
709	006-790-032	14325 ANCHOR LANE	2.05
710	038-360-065	16857 JONES RIDGE ROAD	4.85
711	039-221-022	12823 LOST LAKE ROAD	2.53
712	006-830-022	14324 LA NORIA COURT	3.05
713	039-180-044	13970 RYANS RANCH ROAD	8.4
714	039-180-036	13162 MANION CANYON ROAD	5.85
715	039-210-051	17024 GREENHORN ROAD	12.75
716	038-360-008	N/A	34.67
717	006-840-018	13330 ANVIL ROAD	2
718	039-200-086	16367 PINE KNOLL ROAD	4.01
719	006-441-021	13224 OMEGA COURT	1.72
720	006-441-011	14095 CHRISTOPHER ROBIN WAY	2
721	038-360-080	17366 JONES RIDGE ROAD	6.67
722	006-840-034	13529 SAFFRON DRIVE	5.18
723	039-230-057	13080 JUPITER DRIVE	1.98
724	006-410-008	13775 GREENHORN ROAD	1.6
725	039-200-061	18849 JONES RIDGE ROAD	3.81
726	038-440-033	17661 JONES RIDGE ROAD	10.03
727	039-190-054	16610 LOG CABIN TRAIL	8.64
728	039-190-083	N/A	2.43
729	039-221-061	12679 ANVIL ROAD	1.5
730	039-210-028	17019 PINE PEAK ROAD	2.99
731	038-440-026	19121 GREENHORN ROAD	13.14
732	006-830-060	14105 COLLIER ROAD	4.7
733	006-830-059	14011 CORONADO COURT	3.07
734	039-200-033	16404 GREENHORN ROAD	1.39
735	038-360-066	17315 SUNSET MOUNTAIN PLACE	4.86
736	006-700-069	14361 STAR DRIVE	1.22
737	006-790-017	14458 ANCHOR LANE	0.71
738	006-790-001	14225 HOLLYDALE ROAD	1.4
739	039-221-070	13627 RACCOON MOUNTAIN ROAD	5
740	039-170-055	13500 TOBY TRAIL	9.84
741	038-360-077	17679 JONES RIDGE ROAD	2.01
742	038-360-046	17101 JONES RIDGE ROAD	1.5
743	038-360-028	11272 WALUPA WAY	2.22
744	039-160-027	14499 LAVA CAP MINE ROAD	8.91

745	006-790-051	14418 ANCHOR LANE	3.16
746	006-710-015	14233 TIM BURR LANE	0.54
747	039-190-061	14799 MILL CREEK LANE	5.85
748	038-350-027	16266 MEADOW WAY	40
749	038-450-018	17617 GREENHORN ROAD	5
750	039-180-027	13612 GRIZZLY TRAIL	10.55
751	039-221-046	12725 ANVIL ROAD	5.03
752	039-170-045	13945 TOBY TRAIL	1.59
753	039-170-043	15846 COON HOLLOW COURT	4.98
754	039-230-062	13035 HOPPY HOLLOW ROAD	7.4
755	039-210-021	17179 GREENHORN ROAD	9.76
756	039-190-064	14215 MURPHY PLACE	4.94
757	038-450-020	17874 GREENHORN ROAD	5
758	039-230-036	12886 ECHO GLEN ROAD	7.03
759	039-221-053	12380 GOLD STARR LANE	1.83
760	039-200-047	15521 PINE KNOLL COURT	1.91
761	039-210-048	17244 MISTY GREEN COURT	10
762	006-790-027	14554 LITTLE HILL LANE	1.5
763	006-391-014	13010 GREENHORN ROAD	1.33
764	006-391-025	13072 GREENHORN ROAD	2.84
765	039-210-044	14655 LITTLE GREENHORN ROAD	4.85
766	006-410-045	14150 COLLIER ROAD	5
767	039-170-078	14970 CRAIG LANE	4.96
768	038-350-007	16372 PIONEER RIDGE ROAD	4.91
769	039-230-039	13675 AXLE COURT	2.51
770	006-820-027	13621 GREENHORN ROAD	0.72
771	006-840-050	13270 ANVIL ROAD	2.57
772	039-200-078	17002 GREENHORN ROAD	5.04
773	039-221-080	12770 HOPPY HOLLOW ROAD	10.88
774	039-210-025	14510 LITTLE GREENHORN ROAD	19.28
775	006-830-057	13966 CORONADO COURT	6
776	006-441-006	13272 LOWER ANCHOR LANE	2.68
777	006-820-038	13139 GREENHORN ROAD	0.43
778	039-230-047	13611 AXLE COURT	1.5
779	039-170-074	15649 GREENHORN ROAD	18.03
780	006-720-038	14240 HOLLYDALE ROAD	0.49
781	006-710-013	12855 GREENHORN ROAD	1.1
782	006-410-066	13788 CALL OF THE WILD LANE	5.03
783	039-190-065	14210 MURPHY PLACE	4.94

784	038-360-049	N/A	4.88
785	006-441-018	13793 CHRISTOPHER ROBIN WAY	3.75
786	006-820-030	13505 GREENHORN ROAD	2.29
787	038-360-030	16874 MEADOW WAY	17.28
788	039-230-066	13275 LOST LAKE ROAD	7.82
789	006-410-062	12050 DOGWOOD ROAD	2.66
790	006-410-043	13952 COLLIER ROAD	8.57
791	006-820-031	13641 GREENHORN ROAD	3.34
792	039-170-064	16004 GREENHORN ROAD	4.88
793	039-180-008	13405 CAMPBELL LOOP	19.83
794	006-820-025	13711 GREENHORN ROAD	1.6
795	039-160-031	14320 BELLE STARR ROAD	10.07
796	039-210-020	17285 GREENHORN ROAD	19.58
797	006-820-004	14093 GLENN PINES ROAD	1
798	038-350-011	16404 JONES RIDGE ROAD	5.54
799	039-200-019	15394 JULIA RANCH ROAD	19.85
800	039-180-026	14230 MILL CREEK LANE	6.47
801	006-441-012	14107 CHRISTOPHER ROBIN WAY	1.75
802	038-350-012	16259 PIONEER RIDGE ROAD	4.54
803	006-410-032	13920 GREENHORN ROAD	4.21
804	039-170-075	15750 GREENHORN ROAD	2.61
805	006-790-003	13139 GREENHORN ROAD	2.14
806	006-700-048	14436 TIM BURR LANE	1.15
807	006-710-012	12813 GREENHORN ROAD	0.72
808	039-230-050	12888 LOST LAKE ROAD	1.5
809	006-830-036	12552 HONEYDEW LANE	5.01
810	012-800-001	N/A	55.1
			4976.0

Master Response 6 - Wildfire Impacts

Comments

A number of comments received on the DEIR focus on the Project's potential to exacerbate wildfire in the area. However, as thoroughly analyzed in Chapter 4.13 of the DEIR, all potential wildfire impacts as a result of the Project, would be mitigated to less than significant.

Discussion

The following section provides a summary of the extensive discussion and analysis of wildfire in Chapter 4.13 of the DEIR.

Existing Environmental Setting

Section 4.13.2 of the DEIR describes the existing wildfire setting for the Project region. Both the Centennial and Brunswick Industrial Sites are located on lands classified as being within a Very High Fire Hazard Severity Zone. (DEIR, p. 4.13-1.) The Project sites are currently served by several fire agencies, which provide both wildland fire and structural fire response. (DEIR, p. 4.13-1.) Additionally, responsibility for wildland fire suppression for both sites is the primary responsibility of the state, given that both the Centennial and Brunswick Industrial Sites are located within State Responsibility Areas. (DEIR, pp. 4.13-1, 4.13-7, Figure 4.13-1.) Nevada County, in which the Project is located, also is home to the Grass Valley Air Attack Base and the Grass Valley Emergency Command Center, both of which are located at the Nevada County Airport in Grass Valley, and which provide emergency services related to wildfires in the region. (DEIR, p. 4.13-8.)

The Project sites vary as to their topography, although the entire Project region does not contain significant slopes (such as those in steep-walled canyons or mountainous valleys). (DEIR, p. 4.13-3.) Pursuant to the Project's baseline, the Brunswick Industrial Site includes approximately 58 acres of forest land, and the Centennial Industrial Site includes up to 10 acres of forest land. (DEIR, p. 4.13-3.) The DEIR discusses the wildfire history for the region surrounding the Project sites and notes that relatively few larger wildfires have occurred in the region over the past three years. (DEIR, pp. 4.13-3 to 4.13-4.)

The DEIR also discusses various fuel treatment efforts that have been ongoing within the Project region. (DEIR, p. 4.13-5.) Figure 4.13-2 of the DEIR depicts the completed, active, and planned fuel treatment projects within the region surrounding the Project site. (DEIR, Figure 4.13-2.) The DEIR recognizes that many of the regional fuel treatment projects are located in steep canyons or ravines, where wildfire risk is increased. (DEIR, p. 4.13-5.)

Regulatory Context

Section 4.13-3 of the DEIR summarizes the federal, state, and local wildfire regulations applicable to the Project. (DEIR, pp. 4.13-8 to 4.13-14.) Among other things, Section 4.13-3 describes the safety standards for buildings and development that the Project must implement, as well as the applicable local wildfire goals and policies in the Nevada County General Plan, Nevada County Emergency Operations Plan, Nevada County Local Hazard Mitigation Plan, and Nevada County Community Wildfire Protection Plan. (DEIR, pp. 4.13-9 to 4.13-14.)

Significance Thresholds

The DEIR includes standards of significance and methodology used to analyze and determine potential Project-specific impacts related to wildfire, consistent with Appendix G of the CEQA Guidelines. (DEIR, pp. 4.13-14 to 4.13-28.) For the purposes of the DEIR, a wildfire impact is considered significant if the Project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan (**Threshold WF-1**).
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (**Threshold WF-2**).
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment (**Threshold**

WF-3).

- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (**Threshold WF-4**).

The DEIR demonstrates that the Project, as mitigated, would not have significant wildfire impacts. The DEIR's analysis in relation to each of these thresholds is summarized below:

Threshold WF-1 (Substantially Impair an Adopted Emergency Response Plan or Emergency Evacuation Plan)

The DEIR concludes that the Project would not substantially impair an adopted response plan or emergency evacuation plan, no mitigation is required, and any related Project impacts would be less than significant. (DEIR, p. 4.13-17.)

Nevada County's primary evacuation routes consist of major interstates, highways, and principal arterials identified on the Nevada County General Plan Land Use Map. (DEIR, p. 4.13-15.) Secondary evacuation routes, which provide egress from local neighborhood and communities, consist of routes designated on the General Plan Land Use Map as minor arterial or major collector routes. (DEIR, p. 4.13-15.) Brunswick Road, which is the public road applicable to the Project, is considered a minor arterial route, and thus is considered a secondary evacuation route—not a primary evacuation route—for the County. (DEIR, p. 4.13-15.)

The Project will include the hauling of engineered fill and barren rock by trucks within the Brunswick Industrial Site using only on-site private roads, from the Brunswick Industrial Site to the Centennial Industrial Site using Brunswick Road and Whispering Pines Lane, and/or from the Brunswick Industrial Site off-site to local and regional markets using Brunswick Road to State Route 20/49. (DEIR, pp. 4.13-15 to 4.13-16.) Over the life of the Project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6 a.m. to 10 p.m., seven days per week, which equates to approximately 7.4 haul truck round trips per hour on Brunswick Road. (DEIR, p. 4.13-16.)

In the event of a wildfire or other emergency that requires evacuation, the incident command would direct the County Office of Emergency Services to issue an evacuation order and provide related notifications to residents. (DEIR, p. 4.13-16.) If an evacuation order occurs in the vicinity of the Project, such as an evacuation of residents off of Greenhorn Road, the mine would be contacted and asked to temporarily shut down the mine and cease all truck hauling operations. (DEIR, p. 4.13-17.) Ceasing haul truck operations during the emergency evacuation order, in addition to the temporary cessation of mine operations, would ensure that the Project would not have the potential to physically interfere with an emergency evacuation plan. (DEIR, p. 4.13-17.)

Therefore, the Project would not substantially impair an adopted response plan or emergency evacuation plan, no mitigation is required, and any related Project impacts would be less than significant. (DEIR, p. 4.13-17.)

Threshold WF-2 (Due to Slope, Prevailing Winds, and Other Factors, Exacerbate Wildfire Risks, and Thereby Expose Project Occupants to, Pollutant Concentrations from a Wildfire or the Uncontrolled Spread of a Wildfire)

The DEIR concludes that, with the implementation of Mitigation measure 4.13-2 (Vegetation Management Plan), the Project's potential wildlife impacts would be reduced from potentially significant to less than significant. (DEIR, p. 4.13-22.)

The Brunswick and Centennial Industrial Sites vary as to their topography, and although less than 7 acres of steep slopes (equal to or greater than 30%) occur on the Brunswick Site and approximately 4 acres of steep slopes occur on the Centennial Site, both sites do not contain any significant slopes, such as those in steep-walled canyons or mountainous valleys. (DEIR, p. 4.13-17.)

With respect to prevailing winds, the predominant wind direction at the Project site area is from the North-East and South-West directions, which suggests that a fire burning in the forest terrain southwest of the Project could burn through the Sites due to prevailing southwesterly winds. (DEIR, p. 4.13-17.)

Although the Project includes approximately 58 acres of forest land at the Brunswick Industrial Site and up to 10 acres of forest land at the Centennial Industrial Site, according to the Project's baseline, the Project proposes to remove approximately 6.5 acres of the 58 acres of forest land on the Centennial Industrial Site and 18.5 acres on the Brunswick Industrial Site. (DEIR, p. 4.13-18.) Thus, the proposed project would result in the removal of approximately 25 acres of forest land, in addition to the removal of other mid- to low-level vegetation. (DEIR, p. 4.13-18.) The DEIR concludes that a reduction in on-site vegetation would result in a concomitant reduction in fuel sources, and thus, a reduction in wildfire hazard. (DEIR, p. 4.13-18.)

Additionally, multiple ongoing and planned fuel treatment projects are located in the Project region, which would further reduce wildfire risk in the Project area. (DEIR, p. 4.13-18.)

The Project is also subject to a Fire Protection Plan (FPP), which among other things requires the implementation and maintenance of two defensible space zones around the proposed industrial buildings on the Brunswick Industrial Site, within the property boundaries, as shown in Figure 4.13-3 of the DEIR. (DEIR, p. 4.13-18.) The 30-foot Zone 1 defensible space would be paved with asphalt with the exception of two small areas adjacent to the covered conveyor and to the office and warehouse, resulting in no high fuel load areas present in Zone 1. (DEIR, p. 4.13-18.) All dead or dying vegetation would be removed from the Zone 1 area during grading and other construction activities, no dead tree or shrub branches would be present in proximity to planned buildings, no firewood piles are proposed at the Project site, and flammable vegetation or other items would be prohibited from being placed adjacent to buildings. (DEIR, p. 4.13-18.) The 100-foot Zone 2 defensible space would similarly be paved with asphalt, except for areas of existing vegetation in the perimeter of the area, and no high fuel load areas would be present in Zone 2. (DEIR, p. 4.13-20.) The Project would create horizontal and vertical spacing among shrubs and trees utilizing either or both of the Fuel Separation or Continuous Tree Canopy methods, in accordance with the State Board of Forestry and Fire Protection's applicable guidelines for defensible space. (DEIR, p. 4.13-20.) The Project site will not be allowed to exceed a maximum depth of three inches as to loose surface litter (e.g., fallen leaves or needles, twigs, bark, cones, small branches) and a maximum height of four inches as to annual grasses and forbs. (DEIR, p. 4.13-20.)

Given that the Brunswick Industrial Site is located within a Very High Fire Hazard Severity Zone, the proposed structures on the Site will comply with all applicable fire safety standards in Chapter 7A of the California Building Code, including but not limited to using ignition-resistant materials, fire-intrusion design of roofing and vents, and glazed exterior windows and doors, as well as complying with all fire code requirements set forth by the California Building Code and the California Fire Code, as determined by the County Fire Marshal at the building permit stage. (DEIR, p. 4.13-20.)

The Project will also include the installation of a fire flow system that would connect to the 18-inch Nevada Irrigation District water main in Brunswick Road, which would be reviewed by the County Fire Marshal to ensure that the fire flow system meets California Fire Code requirements. (DEIR, p. 4.13-20.)

Any use of explosives in connection with the Project would comply with applicable federal and state laws at all times, to help ensure that a significant hazard to the public or the environment through routine transport, storage, or use of explosives would not occur. (DEIR, p. 4.13-21.) Moreover, the storage and use of explosives would only occur underground at the Brunswick Industrial Site, and thus an unexpected explosive event would not be likely to exacerbate any above-ground wildfire risks. (DEIR, p. 4.13-21.)

The DEIR addresses public comments made during the Notice of Preparation review period concerning potential wildfire risks associated with the dewatering of the mine. (DEIR, p. 4.13-21.) Commenters suggested that the reduction of groundwater levels and associated drying of surface vegetation would exacerbate wildfire risk. (DEIR, p. 4.13-21.) However, the existing groundwater surface in the areas away from the creeks is below the typical depth of rooted vegetation and tap roots from trees, especially during the drier months. (DEIR, p. 4.13-21; please also see Master Response 33 – Groundwater Dependent Vegetation.) Further discharge of treated water to South Fork Wolf Creek would prevent the lowering of groundwater levels along the creek because the full dewatering volume would be discharged, whereas only a small fraction of the groundwater would come from the creek area. (DEIR, p. 4.13-21.) The potential increased recharge due to the enhanced base flow in South Fork Wolf Creek would more than offset any effects from dewatering in the area near the creek. (DEIR, p. 4.13-21.) The DEIR therefore concludes that the dewatering of the mine would not affect the available moisture for vegetation in the Project area and would not increase fire risk due to reduced groundwater levels. (DEIR, p. 4.13-21.)

Overall, with respect to this threshold, the DEIR concludes as follows:

> The Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (DEIR, p. 4-13.22.)

Therefore, to mitigate against any significant wildfire impacts, the Project will be required to implement a comprehensive Vegetation Management Plan for both the Brunswick and Centennial Industrial Sites, for the duration of the Project. (DEIR, p. 4.13-20, Mitigation Measure 4.13-2 [DEIR, pp. 4.13-22 to 4.13-23].) Local fire agencies, including CAL FIRE, have concluded that ongoing implement of the Vegetation Management Plan would reduce wildfire risks to the Project to a less-than-significant level. (DEIR, p. 4.13-20.)

The result of implementing Mitigation Measure 4.13-2 (Vegetation Management Plan) is the reduction of the Project's potential wildfire impacts from potentially significant to less than significant. (DEIR, p. 4.13-22.)

Threshold WF-3 (Require Installation or Maintenance of Associated Infrastructure That May Exacerbate Fire Risk or Result in Temporary or Ongoing Environmental Impacts)

Although the proposed project would include installation of various infrastructure components, none of the improvements would be expected to exacerbate wildfire risk or otherwise result in significant environmental impacts. (DEIR, pp. 4.13-24 to 4.13-25.) In analyzing this significance threshold, the DEIR acknowledges that certain improvements generally may have the potential to exacerbate wildfire risk under certain conditions, such as the extension of the overheard power line along Brunswick Road if the line comes in contact with tree limbs or overhanging vegetation, or the installation of two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site. (DEIR, p. 4.13-24.) However, given that the installation of these improvements would comply with all applicable laws and regulations, and taking into account the location of the storage tanks (e.g., the storage tanks at the Brunswick Industrial Site will be located in the industrial building complex, away from existing and proposed vegetation), the improvements would not be expected to exacerbate wildfire risks or result in significant environmental impacts. (DEIR, p. 4.13-24.)

Therefore, no mitigation is required as to this threshold, and any related Project impacts would be less than significant. (DEIR, p. 4.13-25.)

Threshold WF-4 (Expose People or Structures to Significant Risks, Including Downslope or Downstream Flooding or Landslides, as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes)

In evaluating this threshold, the DEIR analyzed data from the 2017 McCourtney Fire, which occurred approximately 3.5 miles south/southwest of the Project area and burned approximately 76 acres. (DEIR, pp. 4.13-25 to 4.13-26.) The post-fire debris-flow assessment performed by the U.S. Geological Service concluded that the potential for debris flow occurrence within on-site drainages is low, at 0-20 percent. (DEIR, p. 4.13-26.) The topography and vegetation of the region affected by the McCourtney Fire are generally similar to the Project region, and the DEIR reasonably concludes that one can apply these conclusions to the Brunswick and Centennial Industrial Sites given that they similarly lack substantial steep topography and include mildly incised drainages. (DEIR, p. 4.13-26.) Moreover, although the engineered fill pads would constitute the largest slopes on the Project sites, the proposed slopes would be relatively gradual at 3:1 (H:V), the fill material would comprise a flexible composite range of blast rock and sand tailings produced underground, and the inclusion of silt into the materials would provide additional cohesion and increase the friction angle of the fill. (DEIR, p. 4.13-26.) The Project also would include drainage facilities to capture runoff prior to entering the creeks, thus minimizing flooding potential downstream. (DEIR, p. 4.13-26.)

Therefore, the probability for post-fire debris flows at the Project Sites is low, no mitigation is required as to this threshold, and any related Project impacts would be less than significant. (DEIR, p. 4-13.26.)

Conclusion

As demonstrated in the DEIR, all potential wildfire impacts for the Project, as mitigated, would be less than significant and the Project will not substantially impact any adopted emergency response plan or emergency evacuation plan.

Master Response 7 - Location of Future Mining Areas

Comments

Several commenters state that the DEIR does not evaluate the project's proposed underground mining operations within the entire mineral rights area, and thus, the DEIR is inadequate. Common concerns related to this general assertion is that the DEIR's groundwater modelling is inadequate and the extent of vibrations associated with underground mining is underestimated

Discussion

Economic gold mineralization does not exist everywhere within the applicant's mineral rights area at 500 feet below surface, and is only in discrete areas; thus, mining would not occur everywhere within the mineral rights area. As such, analysis of mining the entire mineral rights area is not supported by the known geology and is speculative.

DEIR Adequately Evaluates Potential Groundwater Effects from Underground Mining

New underground mining excavations, used for the analysis of groundwater impacts, is based upon information provided by the applicant, as shown on Figures 5-1 of Appendix K.3 and Sheet 15 of Appendix K.2. As shown in these figures, assumed mining areas are based on the projected down-dip extensions to mineralized veins historically mined. The mining depths analyzed in the groundwater model were based on the applicant's intended mining plan, which is focused on the areas where gold mineralization was actually encountered, at depths deeper than 1,000 feet below the surface.

Itasca analyzed the impacts of variations in the location of future mine workings. Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization, as shown in Figure 5.10 of Appendix K.3. As shown in Figure 5-12, the major mining expansion studies in Scenario 6 did not result in a significant expansion in the simulated 5-foot drawdown contour versus the base case. As stated on page 31 of Appendix K.3, it is expected that the actual mining areas will change from the modeled mining areas due to vein geometry and discoveries, which will only be known after extensive underground exploration is completed in the future. Itasca recommends that the groundwater flow model be updated periodically after dewatering commences. Updated modeling would incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates. The DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the Project could result in a significant impact to groundwater supplies.

Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202), and will also prohibit blasting closer than 500 feet below ground

surface except for construction of the service shaft. The condition of approval language is provided below:

> *Except for the construction of the proposed Service Shaft, all underground blasting for production, tunnelling, and raising would take place more than 500 feet below ground surface and no underground mining will take place outside of the area denoted on the maps included in Appendix A of the Final EIR.*

A Groundwater Monitoring Plan (GMP) is required for the Project under Mitigation Measure 4.8-2(a). Ongoing groundwater monitoring would be required, and groundwater-level information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis and submitted in report form to the Nevada County. Mitigation Measure 4.8-2(b) requires that if it is determined based on the GMP that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified. As stated in Mitigation Measure 4.8-2(a), groundwater monitoring is required on an ongoing basis. Therefore, changes in locations of mine workings, and the effect on groundwater levels at surface, would be observed by the GMP and replacement water would be required. The GMP is designed to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.

DEIR Adequately Evaluates Potential Blasting Vibration and Noise from Underground Mining

Blasting vibration are analyzed in Section 4.10 of the DEIR. As discussed in the DEIR and in Appendix M, except for the construction of the proposed Service Shaft, all underground blasting for production, tunnelling, and raising would take place more than 500 feet below ground surface. A condition of approval for this blasting depth restriction has been included in the Final EIR, as discussed above. As discussed in section 4.10-4 of the DEIR and the PBS Technical Report, a maximum of 0.23 inches per second vibration is modelled where a longhole blast could occur directly beneath a receptor at 500 feet depth. Notwithstanding the rarity of this situation, such a blast might occur every three or four days between shift changes (7AM and 7PM) and would last for only seconds. At 500 feet depth and a horizontal offset of 1400 feet, such a longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Regular drift round blasting, occurring approximately twice daily over several seconds, is modelled to result in a maximum of 0.14 inches per second vibration at a depth of 500 feet directly beneath a receptor. At 500 feet depth and a horizontal offset of 900 feet, a drift round blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Historic mining was completed to approximately 1600 feet depth and the majority of future mining is expected to be below the historic mine surface area. At this distance, regular drift round blasting and longhole blasts would be undetectable by blasting seismograph (PPV <0.05 in/sec) at receptor locations directly above the blast location. Several commenters have expressed concern about noise from blasting and the effect of this noise based on the location of mining underground. As opposed to vibration, audible noise from underground blasting can only propagate to surface from through the mine tunnels and shafts. Therefore, noise impacts from blasting are relative to a receptor's proximity to the shaft headframes at the Brunswick Site and not the location of the underground workings. As stated on page 4.10-44 of the DEIR, the noise from blasting is less than significant even for the closest receptors to the Brunswick shaft headframe.

Conclusion

The DEIR (Chapters 4.8 and 4.10) adequately evaluates the potential environmental effects that could result from the project's reasonably anticipated underground mining operations, including effects to groundwater and noise and vibration, and concludes that impacts would be less-than-significant with implementation of mitigation. Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area, as shown on maps A101, A201 and A202 in Appendix A to this Final EIR, and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft.

Master Response 8 - Mine Waste Characterization

Comments

The County received several comments asserting that the waste characterization conducted on samples from the Project site is inadequate and that further testing should be done before the project is approved, in an effort to ensure water quality impacts do not ensue from stormwater runoff at engineered fill sites.

Discussion

As discussed below, geochemical testing was already conducted on samples from the Project site to assess impacts to water quality. Moreover, the DEIR requires that a report of waste discharge (RoWD) be submitted to the Central Valley Regional Water Quality Control Board (CVRWQCB), and approval of Waste Discharge Requirements (WDRs) prior to placement of any mine waste. Significant additional testing of rock material will be required as part of the process of obtaining WDRs from the CVRWQCB. Given the geochemical testing that has already been conducted to characterize the water quality impacts of engineered fill and cemented paste backfill placement, and the further waste characterization that will be required as part of the WDRs approval process, additional testing is not required for the purposes of CEQA.

Section 4.8.4 of the DEIR provides an analysis of the environmental impact from mine wastes produced by the proposed Idaho-Maryland Mine Project. The impact to water quality from mine waste is considered potentially significant for the purposes of the DEIR's analysis, and mitigation is necessary to reduce the impact to less than significant. (see DEIR, Impact 4.8-1; Mitigation Measures 4.8-1(a) to 4.8-1(e).) These mitigation measures (4.8-1(a) to 4.8-1(e)) require the applicant to submit a RoWD and receive an approved Waste Discharge Requirement (WDR) from the CVRWQCB prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)).

The Project would be subject to California mining waste regulations as discussed on pages 4.8-28 and 4.8-29 of the DEIR. Barren rock, sand tailings, and cemented paste backfill will be considered mining waste under California Water Code Section 13050(q)(1) and Title 27 of the California Code of Regulations (CCR), Sections 22470 et seq. and therefore subject to regulation and oversight by the CVRWQCB prior to placement of mine waste.

Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project. Testwork included Acid Based Accounting (ABA), Total Metals, and California Waste Extraction Testing (WET). The Waste Extraction Test (WET) should be used to determine the amount of extractable substance in waste rock (CCR Title 22 Division 4.5, Chapter 11, Article 5, Appendix II). The overall purpose of the barren rock and tailings sampling and laboratory analysis was to identify the general characteristics of that specific

material type. As such, the results of the barren rock and tailings testing provide reliable and representative results for consideration in the DEIR and for assessment of the potential effects of the use of that material for engineered fill and cemented paste backfill.

The analysis and testwork used in the preparation of the DEIR is for the purposes of analyzing the water quality impacts of the project consistent with the California Environmental Quality Act (CEQA) but is not intended to be a RoWD. Further testing of material will be required prior to submittal of a RoWD; however, a RoWD is not required at this stage of the project. Some commenters requested that additional testwork be completed as part of the CEQA analysis similar to what will be required for the RoWD; however, the testwork already completed is sufficient to assess project impacts, and engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) Based on the results of the testwork, the DEIR concludes that the effect of the proposed actions on water quality would be potentially significant. The mitigation measures, as confirmed in the April 4, 2022 comment letter from the Central Valley Water Board, identify the steps that must be taken to reduce the potential impacts to less than significant. The engineering details and intensive sampling described by many commenters would be developed and completed through the implementation of mitigation measures, and is not required to be completed as part of the CEQA process. The final determination of classification is done when the RoWD is submitted and an approved WDR is received from the CVRWQCB as required in Mitigation Measures 4.8-1(d) and 4.8-1(e). The RoWD would be prepared and submitted in compliance with CCR Title 27 Sections, 21710-21760. (CCR Title 27 Section 22470(a)). The WDR will incorporate the necessary construction, monitoring, and closure of the waste management unit, based on the waste characterization, in order to protect water quality.

As described in Section 3.7 of the DEIR, underground exploration would take place after mine dewatering is complete and throughout the life of the mine. Exploration would be done primarily with diamond core drilling throughout the mine area. Exploration would produce core samples that would be brought to the surface for analysis to determine future mining areas. Metallurgical testing would be conducted to create representative tailings samples and cemented paste backfill sample for WET testing.

The CVRWQCB requires that the sample material used for a waste characterization is representative of the entire range of mining waste discharged. Therefore, consistent with CVRWQCB requirements, a sampling plan that addresses representative sampling of the mining waste would be submitted to the CVRWQCB prior to sampling and the CVRWQCB will be notified when the samples are to be collected so that they may observe the process. (see CVRWQCB website Submitting a Report of Waste Discharge – CVRWQCB 2022). Collection of field samples and subsequent testing of the expected mining waste would be based on clearly defined objectives identified in a sampling plan, approved by the CVRWQCB, prepared by professional(s) registered to practice in California in the field of engineering or geological sciences (see appropriate professional CCR Title 27 Section 21710 (d).

Waste characterization testing that will be used in a RoWD must be performed by California certified labs. A California certified lab is a lab accredited by the California Environmental Laboratory Accreditation Program. (see CVRWQCB website Submitting a Report of Waste Discharge – CVRWQCB 2022). The WET would be used to determine the amount of extractable substances in waste rock and Acid Generation Potential testing must also be performed to determine whether the material has the potential to generate acid (see Tech Note Mining Waste Characterizations - CVRWQCB 2008).). Further analysis may be required using kinetic testing, which would help determine the mining waste potential for long term acid generation (see Tech

Note Mining Waste Characterizations - CVRWQCB 2008). The waste characterization would be done to the satisfaction of the CVRWQCB to allow them to approve the WDR.

Mining Waste is classified in accordance with CCR Title 27 Section 22480(b) as Group A, Group B, or Group C mining wastes based on an assessment of the potential risk of water quality degradation posed by each waste.

Group A

- Mining wastes of Group A are wastes that must be managed as hazardous waste pursuant to Chapter 11 of Division 4.5, of Title 22 of this code, provided the CVRWQCB finds that such mining wastes pose a significant threat to water quality.

Group B

- Mining wastes that consist of or contain hazardous wastes, that qualify for a variance under Chapter 11 of Division 4.5, of Title 22 of this code, provided that the CVRWQCB finds that such mining wastes pose a low risk to water quality; or
- Mining wastes that consist of or contain nonhazardous soluble pollutants of concentrations which exceed water quality objectives for, or could cause, degradation of waters of the state.

Group C

- Mining wastes from Group C are wastes from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity.

The testwork conducted in connection with preparation of the DEIR demonstrates that the engineered fill and cement paste backfill will likely be considered Group C mining waste. However, the waste characterization conducted as part of the RoWD for the project will provide the basis for which features, operation plans for waste containment, precipitation and drainage controls, are required for the project in accordance with CCR Title 27 Section 22490. As part of the WDRs, the mine operator will also be required to conduct water quality monitoring in accordance with CCR Title 27 Section 22500 and closure and post closure maintenance plans in accordance with CCR Title 27 Section 22510.

CVRWQCB Permitting over 80-Year Use Permit Term

Several comments have been received on ongoing waste characterization requirements throughout the 80-year term of the Use Permit. In accordance with CCR Title 27 Section 21710(a)(4), once WDRs for a mining waste unit have been issued, the CVRWQCB must be notified of any material change in the types, quantities, or concentration of mining wastes discharged within a reasonable time before those changes are made effective. Therefore, as exploration and mine planning continue throughout the life of the mining operation any changed or updated information would be provided to the CVRWQCB and in some cases incorporated into the WDRs.

As discussed in Master Response 11 – Location of Future Mining Areas, the RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and



classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant will prepare and implement a Waste Characterization Plan (Characterization Plan) which will be incorporated into the approved WDR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes will be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e. sites other than the applicants Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization will be established in the approved WDR. Mitigation Measure 4.8-1(e) has been revised in this Final EIR to more clearly reflect the above ongoing waste characterization requirements (please see Master Response 11 for more detail).

Finally, in accordance with CCR Title 27 Section 21720 (f), the discharger is required to maintain records of the volume and type of each waste discharged at each unit and the manner and location of the discharge. These records shall be available until the waste unit is closed and available for review by the CVRWQCB. Therefore, as mining waste is produced it would require continuous inventory and testing in accordance with the approved WDR. In accordance with CCR Title 27 Section 21720 (c), Unit classifications and WDRs for existing Units would be fully reviewed in accordance with schedules established by the CVRWQCB and specified in the WDR.

Conclusion

California Waste Extraction (WET) testing was performed on samples of mine materials and the results of these tests suggest the engineered fill (barren rock and sand tailings) will be a Group C mining waste. Nonetheless, the DEIR has concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measures 4.8-1(d) and 4.8-1(e) to address these potential impacts and reduce the impact to less than significant. The purpose of the Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board is to ensure the effluent from mine waste does not impact water quality. Further testing will be required as part of the RoWD and WDR process as required by Mitigation Measures 4.8-1(d) and 4.8-1(e) such that any impacts will be mitigated. WDRs for the Project will require ongoing waste characterization, monitoring, and reporting to ensure compliance.

References

Central Valley Regional Water Quality Control Board (CVRWQCB). (2022). *Submitting a Report of Waste Discharge. Accessed May 2022.*
https://www.waterboards.ca.gov/centralvalley/water_issues/mining/report_waste_discharge/index.html

Central Valley Regional Water Quality Control Board (CVRWQCB). (2008). *Tech Note Mining Waste Characterizations. Accessed May 2022.*
https://www.waterboards.ca.gov/centralvalley/water_issues/mining/mine_waste_technote.pdf

Master Response 9 - Historical Mine Waste at Centennial Site

Comments

Several commenters asserted that the chemical characteristics of the historic mine waste on the Centennial site that is being cleaned up as a separate project under the jurisdiction of DTSC, is

evidence that the waste rock from the Project will lead to water quality impacts and impacts to human health. Several commenters have also incorrectly asserted that the Centennial Site is either designated or under consideration to be listed as a "Superfund" site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by the USEPA.

Discussion

The Centennial Industrial Site was the location used for the storage of mine tailings by the historical mining operation. Detailed evaluations of these historical mine wastes are provided in the Preliminary Endangerment Assessment (PEA) and Draft Final Remedial Action Plan (RAP) for the Centennial M-1 Property. These reports were prepared pursuant to a Voluntary Cleanup Agreement (VCA) between Rise Grass Valley Inc. and the California Environmental Protection Agency Department of Toxics Substances Control (DTSC). These reports have been reviewed by and have received technical approval from the DTSC. The VCA project is a separate project from the Idaho-Maryland Mine Project. See Master Response 4, Cleanup Project is a Separate Project Under CEQA.

Elevated Metals in Historical Mine Waste

Elevated metal concentrations are present in certain areas of the historical mine waste, and these portions of the mine waste are to be consolidated and capped to reduce the potential for future routine contact and human health risk. The plan and objectives presented in the RAP are to excavate, consolidate, and cover these materials to eliminate these potential health risks. Figure 5, which is reproduced from the RAP, shows the areas (hatched in yellow) where the cleanup of materials with elevated metals is proposed. The historic rock dam contains the majority of the materials where elevated metals are present in historic mine waste. These excavation areas (ETP-E and WTP-N), total 118,000 cubic yards or 86% of the 138,000 cubic yards of material proposed to be remediated in the RAP and 26% of the total 534,000 yards of historical mine waste present in assessment areas of the site. Figure 6 shows a labeled historic aerial photograph of the tailings facility which is reproduced from the RAP. A rock berm was built (label 8) across the northern side of the property by the historical operator in order to contain the tailings produced by mineral processing. The construction of this rock berm commenced in 1920 and was constructed from waste rock produced from the underground mine before 1920. The operations report for 1920 discusses this and states "Tailings Impounding Dam: The waste rock from the mine is being utilized for the construction of this dam, the cost of which is nominal for the reason that the waste dump proper is now large, requiring long tracks and is constantly decreasing in height as the rill rises rapidly in the direction in which the dump is being extended. The dam completed will impound 1,400,000 cubic yards of tailings. The proposed dam, etc. has been submitted to the Debris Commission and accepted by them as satisfactory." (IMMC 1921)

During the historic era of mining virtually all exploration was done by tunneling in mineralized veins in order to locate ore shoots with economic gold values. Therefore, the waste rock produced in this era of mining, and used in the construction of the tailing's berm, is composed of mineralized material with low gold values but elevated metals due to the presence of sulfides (such as pyrite). Sheet 9 of Appendix K.2 of the DEIR shows the shallow historical mine workings and illustrates how almost all tunnelling was conducted in mineralized veins. As described in Section 3.7 of the DEIR, the proposed development tunnels, which will be used to provide access to gold-bearing veins, will be constructed in non-mineralized rock (barren rock) outside of mineralized zones. Gold mineralization would be located and delineated by exploration core drilling. Therefore, the great majority of waste rock produced by the proposed Idaho-Maryland Mine Project will be unmineralized barren rock rather than the mineralized waste rock produced by the historical mine.

Approximately 37.1 acres of the 56.4-acre Centennial Site are occupied by former tailings ponds, which are separated into two primary assessment areas: Eastern Tailings Pond (ETP) and Western Tailings Pond (WTP). The ETP is located closer to the historical off-site gold ore processing facility and was reportedly constructed first, during the early days of the mining operation when the mercury amalgamation process was used to recover gold. The WTP was reportedly constructed later, when the cyanide recovery process was used to recover gold (NV5 2021).

The majority of the historical mine tailings do not contain significantly elevated metals except for certain hot spots in the western and eastern tailing ponds. These excavation areas (Hot Spots), total 15,800 cubic yards or 11% of the 138,000 cubic yards of material proposed to be remediated in the RAP, 6% of the 263,000 yards of tailings contained in the western (WTP) and eastern tailings (ETP) pond assessment area, and 3% of the total 534,000 yards of historical mine waste present in assessment areas of the site. Figure 5 (included in this master response below), which is reproduced from the RAP, shows the hot spot locations (circles hatched in yellow) where the cleanup of tailings materials with elevated metals is proposed in the separate DTSC project.

One small area, TP19 Hot Spot, was proposed to be treated and neutralized by the addition of cement. The volume of TP19 was estimated at 4,200 cubic yards which is less than 1% of the total 534,000 yards of historical mine waste present in the assessment areas at the site (NV5 2021). CVRWQCB staff concurs with the proposed treatment of the TP19 Hot Spot material (CVRWQCB 2021).

The Western Tailings Pond (WTP) contains the sand tailings derived primarily from processing by ball milling and flotation processing, from 1936 to 1956. Table 2b of the RAP shows total metals concentrations from samples taken at the Centennial Site sorted by area. As shown in Table 2b of the RAP, despite the inclusion of sulfide minerals that would not be present with the proposed processing method, metal values from 41 samples of the historical tailings in the WTP are low. For example, arsenic values range from 1.8 to 28 ppm and average approximately 7 ppm.

During the CEQA process for the RAP, NV5 submitted 19 samples retained from the PEA sampling program to EMSL Analytical Inc. in San Leandro California for CARB 435 (Polarized Light Microscopy) PLM asbestos testing. These samples are distributed across the Centennial Site and represent approximately 37 acres or 2 acres per sample. All 19 samples were <0.25% asbestos by PLM. NV5 submitted 10 samples retained from the PEA sampling program to EMSL for TEM asbestos testing using method EPA 600/R-93/116. No asbestos structures were present in 7 samples from the western tailings area. Three samples from the eastern tailings area had detectable asbestos ranging from 8.1 x10^7 to 2.1 x10^8 structures per gram and <0.01% to 0.02% asbestos by weight.

Centennial Site is Not a Superfund Site

The Centennial Site has never been on the National Priorities List[1] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL, and sites receiving a HRS site score of 28.50 or greater are eligible for placement on the NPL[2]. Even if the USEPA later decided to score the Centennial Site using the HRS, the site would not likely meet the criteria for placement on the NPL, as discussed below.

[1] https://www.epa.gov/superfund/superfund-national-priorities-list-npl
[2] https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi

The HRS uses a structured analysis approach to scoring sites that assigns numerical values to factors that relate to risk based on conditions at the site. The factors are grouped into three categories: (1) likelihood that a site has released or has the potential to release hazardous substances into the environment; (2) characteristics of the waste (e.g., toxicity and waste quantity); and (3) people or sensitive environments (targets) affected by the release. In this case, the Centennial Site would not score highly on the HRS because: as to factor one, it has a limited likelihood of releasing hazardous substances into the environment given that the material has been in place for many decades; as to factor two, the waste at issue (arsenic) is naturally occurring in the region, and is not of a particularly high quantity or toxicity given its concentration; and as to factor three, the site is not used by people and is not a sensitive environment. As such, the Centennial Site is unlikely to be considered eligible for inclusion on the NPL. Moreover, the Centennial Site would need to be scored using the HRS and then go through subsequent processes before being selected for listing on the NPL. Given that the USEPA has not chosen to score the site using the HRS, it can be reasonably inferred that the USEPA also has concluded that the site would not likely score high enough to be placed on the NPL.

Project is Different than Historical Mining

Early mineral processing at the historical mine solely used stamp mills and mercury amalgamation to recover gold, and all tailings were placed into the Eastern Tailings Pond. In the mid 1930's a new processing plant was constructed which utilized a ball mill for grinding and flotation plant. The tailings produced from flotation were pumped to the tailings pond and sulfide concentrates produced by flotation were leached with cyanide to produce gold dore (bricks) with the residual material (sulfide concentrate) pumped to the tailings pond (Clark 2005). These historical (and less efficient) processing methods are believed to be the primary source of the hot spots in the tailings ponds. As described in Section 3.7 of the DEIR, mineral processing for the proposed Idaho-Maryland Mine Project uses a flotation plant to remove the majority of sulfide minerals which would be recovered in the sulfide mineral concentrate for shipment off-site. The Project does not use mercury or cyanide in gold processing. As disclosed in Appendix K.2 of the DEIR, sulfide sulfur recoveries to the flotation concentrate during testwork ranged from 92.9% to 96.3%.

The historical mine waste at the Centennial Site was derived from production from the period from 1920 -1956 and therefore is representative of a substantial portion of the historical mine's production. Unlike historical mining, the proposed Idaho-Maryland Mine Project would not produce large quantities of mineralized waste rock and would remove most sulfide minerals from the sand tailings before the sand tailings are placed as engineered fill. The proposed project is intended to produce mine waste with lower sulfide and metal content than those produced historically.

Given that the proposed future mine waste will by nature and by process design be less mineralized than the historical mine waste, the future mine waste will likely also be classified as Group C waste. Regardless of the future waste classification, the future placement of mine waste as engineered fill will be subject to regulation under the California Code of Regulations (CCR) Title 27, which sets forth requirements pertaining to the discharge of mine waste to land and requires the development of Waste Discharge Requirements (WDRs) by the CVRWQCB.

Prior to development of WDRs and placement of future mine waste as engineered fill, and pursuant to CCR Title 27 and the California Water Code, the CVRWQCB will require:

- A report on the physical and chemical characteristics of the waste and its potential to cause pollution or contamination;
- A report that evaluates the potential for acid mine drainage, discharge or leaching of

heavy metals or the release of other hazardous substances; and
- A detailed plan and management strategy for the placement of mine waste as engineered fill that prevents the pollution or contamination of the waters of the state.

The WDRs will include requirements for routine sampling and analysis of mine waste during operation of the mine to verify the mine waste characteristics and classification under CCR Title 27. Please refer to Master Response 8 – Mine Waste Characterization, for further discussion.

Furthermore, the DTSC will require that mine waste placed at the site be protective of human health by meeting the cleanup goals established in the RAP for the historical mine waste.

Conclusion

This master response demonstrates that the proposed project can be distinguished from historical mining in manner of process methods (e.g., no use of mercury or cyanide) and tunnelling methods (e.g., tunneling in barren rock as opposed to historical tunneling in mineralized veins with elevated metals), which supports the DEIR's conclusion that the project's potential water quality impacts (i.e., App. G X(a)) from generation and deposition of waste rock would be less-than-significant with implementation of mitigation measures.

References

Central Valley Regional Water Quality Control Board (CVRWQCB). (2021). *Review of Draft Final Remedial Action Plan Centennial M-1 Property, Nevada County.* Sacramento, California

Idaho Maryland Mines Company (IMMC). (1921). *Report of Operations of the Idaho Maryland Mines Company from January 1st 1920 to December 31st 1920.* Grass Valley, California

Jack Clark (Clark). (2005). *Gold in Quartz The Legendary Idaho Maryland Mine.* Grass Valley California

NV5 (NV5). (2021). *Draft Final Remedial Action Plan Centennial M-1 Property.* Grass Valley, California

Figure 5
Cleanup Areas from RAP

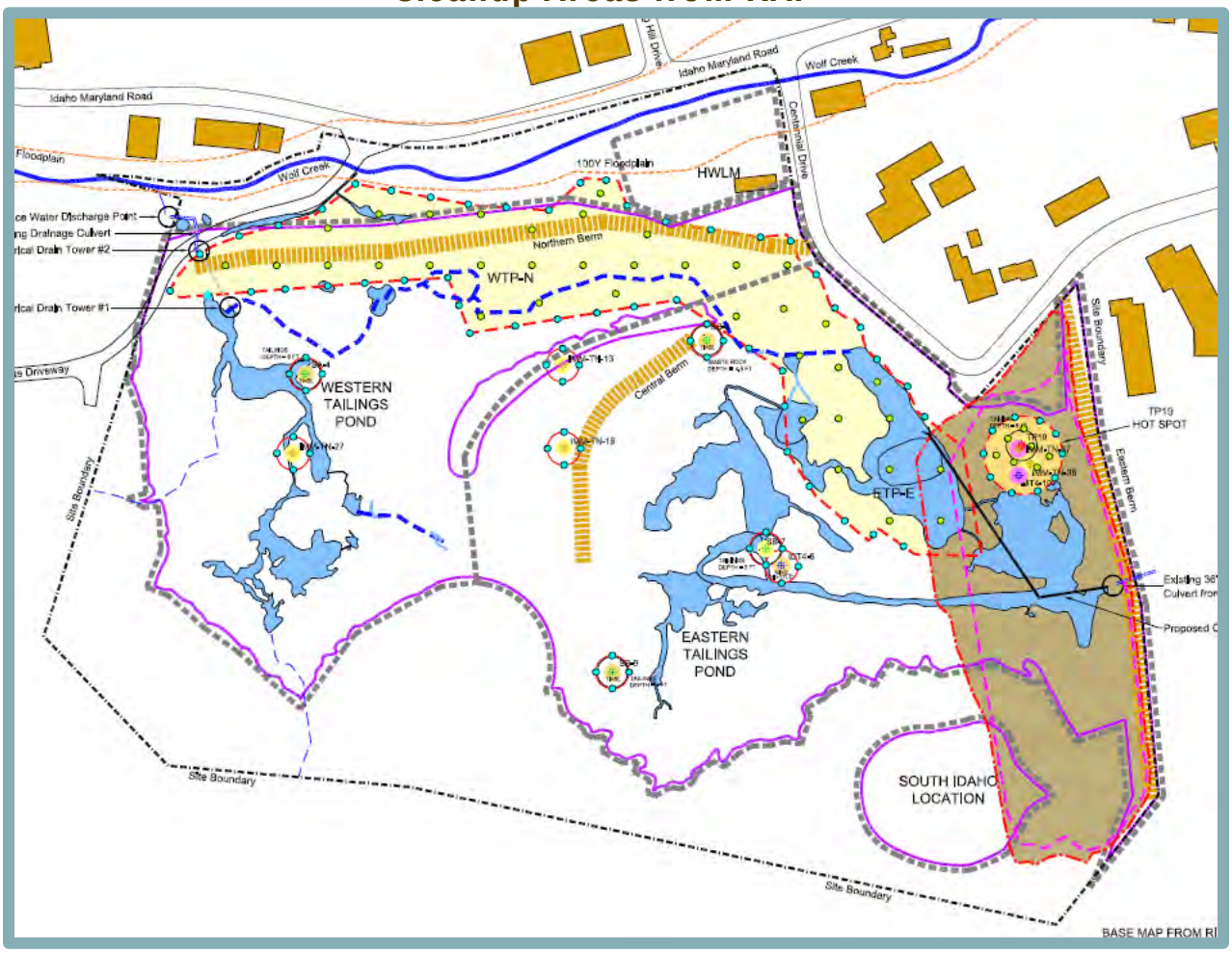
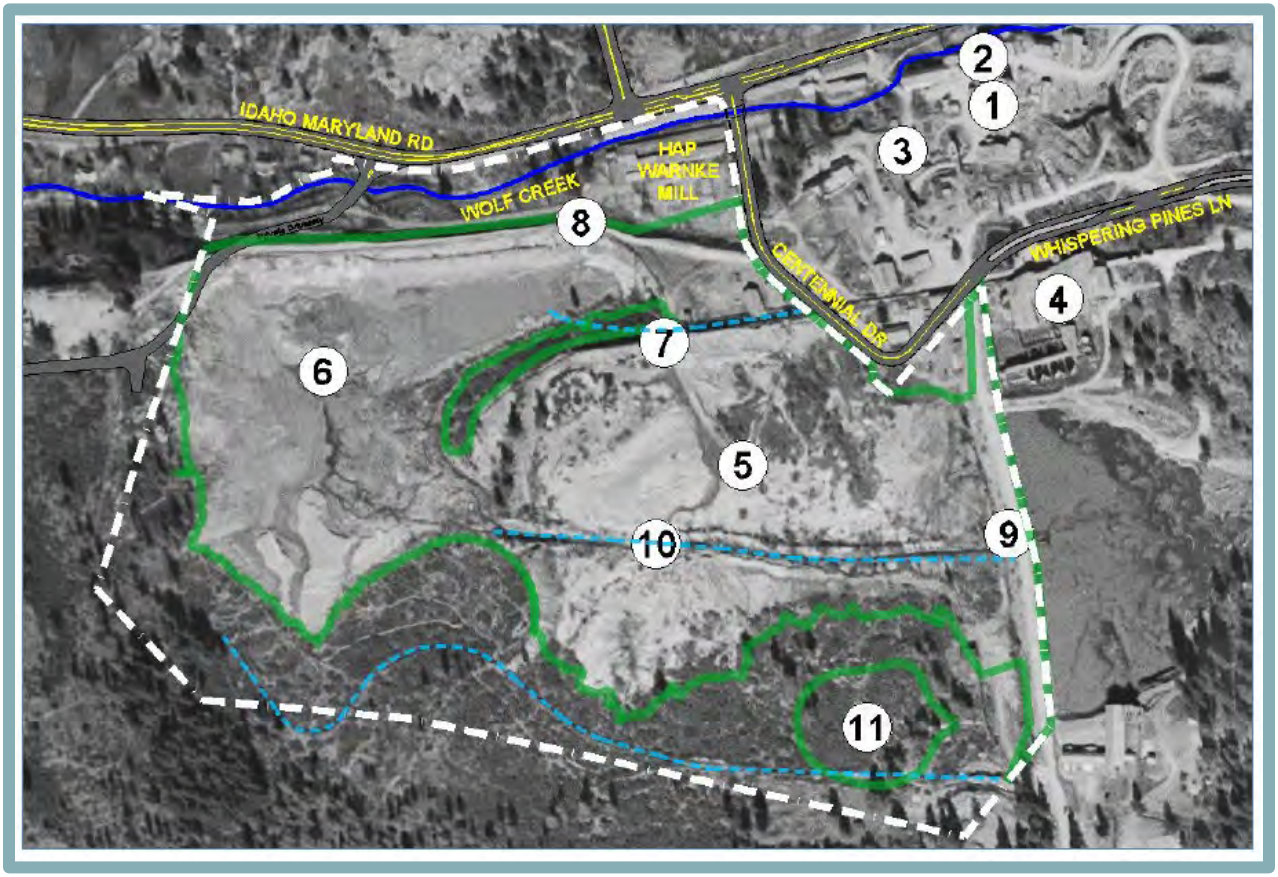


Figure 6
Historic Air Photo from RAP



1) Idaho Shaft headframe
2) Idaho Shaft hoist house
3) Old 20-stamp mill
4) New mill and cyanide plant
5) Eastern tailings pond
6) Western tailings pond
7) Northern ditch
8) Northern berm
9) Eastern berm
10) Central ditch
11) South Idaho Location

Figure 7
PLM Asbestos Samples (NV5)

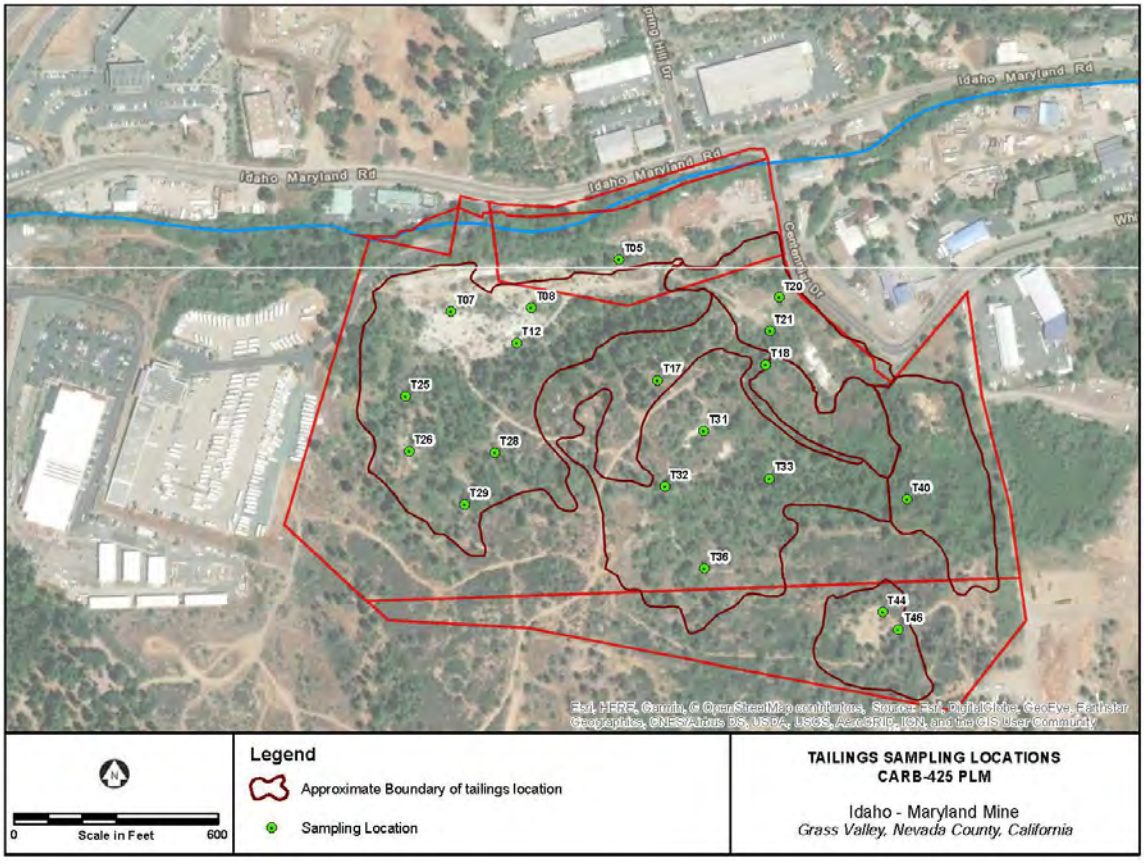
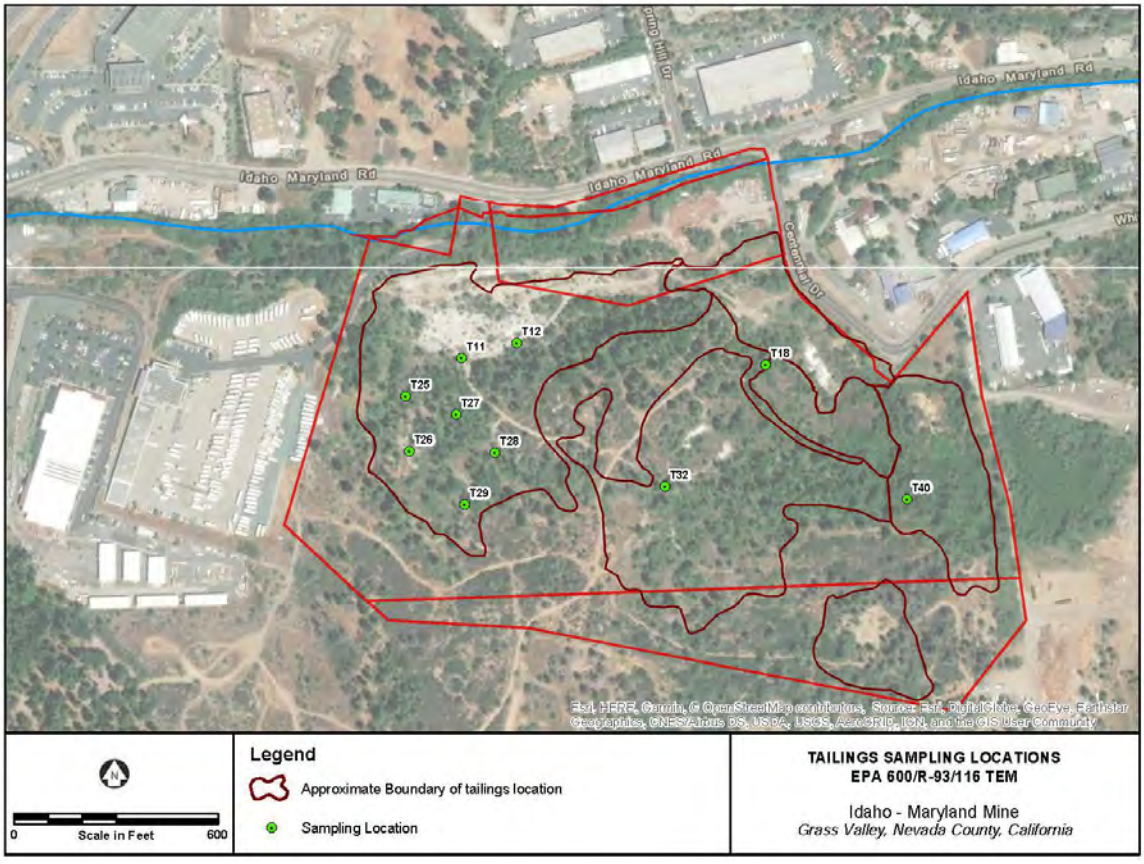


Figure 8
TEM Asbestos Samples (NV5)



Master Response 10 - Explosives, Reagents, and Brunswick Fill

Comments

Several commenters have expressed public hazard concerns related to routine explosives transport, water quality effects from reagents proposed to be used for mineral processing, and human health and water quality effects from historic mine waste at the Brunswick Site.

Discussion

Explosives

Several commenters asserts that the specific frequency of explosives deliveries and/or the Level of Service of intersections from the traffic analysis should be used in the DEIR to analyze the impact of explosives transport. As stated in the DEIR, explosives deliveries would take place from 1 to 3 weeks. (DEIR, p. 4-7.24.) The average of 2 weeks (15 days as calculated by the commenter) is implied from this range. As discussed on pages 14 and 15 of Appendix M of the DEIR, tunneling (drift) blasts would take place daily but production longhole blasting would take

place once every 3-4 days. At certain times explosives may be consumed immediately upon delivery underground when loading larger production longhole blasts. Therefore, explosives consumption is not uniform over every day. The Level of Service is a qualitative description of traffic flow from a vehicle driver's perspective based on factors such as speed, travel time, delay, and freedom to maneuver. As discussed in Section 4.7 of the DEIR, the transportation of explosives in the United States is highly regulated and has an excellent safety record. The analysis of explosives transport in Section 4.7 of the DEIR does not depend on the frequency of explosives delivery or the Level of Service to determine the significance of hazards. Therefore, an increase in delivery frequency or an intersection's level of service would not materially affect the DEIR's conclusion that a less than significant impact would result from explosives transport, storage, and use, after implementation of mitigation. As stated on page 4.7-24 of the DEIR, hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49. Explosives would be transported directly to the Brunswick Site by licensed explosive suppliers that possess the requisite permits, including a CHP hazardous materials transportation license and U.S. DOT hazardous materials permits. State Routes 20 and 49 are designated as explosive transport routes by the CHP[3]. Additionally, the explosives supplier would be required to have a sufficient insurance policy. Table 4.7-2 of the DEIR provides regulations for the transport of explosives. As shown in the table, insurance is regulated by 49 CFR 387. As per this regulation the minimum limit of insurance for freight vehicles of 10,001 pounds or greater transporting explosives is $5,000,000.

Therefore, the DEIR correctly concludes that the project's transport of explosives would have a less-than-significant impact after mitigation related to creating a significant hazard to the public or the environment.

Mineral Processing Reagents

The DEIR describes the proposed mineral processing reagents and their properties, including potential water quality effects (e.g., toxicity to aquatic organisms). Mineral processing reagent type and quantities are shown on page 297 of Appendix E.1. Subsequent to the release of the DEIR the proponent determined, based on additional metallurgical testwork, to eliminate Aeroflot 208 from the proposed reagents.

Reagent Type	**Quantity Used**		**Product**
Promoter	200	pounds per day	Aerophine 3418A
Frother	80	pounds per day	MIBC
Flocculant	80	pounds per day	Magnfloc 10

As stated on page 4.7-29 of the DEIR, the mineral processing reagents are added to the processing water and are soluble. The flotation promoter (Aerophine 3418A) attaches to the mineral particles and therefore the majority of the reagent is within the mineral concentrate, which is shipped offsite. There may be trace amounts of promoter and on the sand tailings and within moisture remaining in sand tailings. The frother (MIBC) will have a tendency to remain in water and therefore would remain in process water, which is recycled in the processing plant and not discharged to the environment. Some frother may be present in moisture remaining in sand

[3] See Map 6 of California Highway Patrol, *HPH 84.3 Explosive Material Shipments: Routes, Safe Stopping Places, and Safe Parking Places*. May 2021.

tailings after dewatering. Flocculant (Magnafloc) used for dewatering of sand tailings would generally remain in the sand tailings. Aerophine 3418 promoter is a unique, phosphine-based collector, which has no odor, is biodegradable and is not harmful to fish, aquatic invertebrates or plants. MIBC (methyl isobutyl carbinol) is unlikely to persist in the environment. The compound is readily biodegradable and completely removed from water and soil environments. MISC is practically nontoxic to fish and other aquatic organisms on an acute basis. The MSDS for Aerophine 3418A and MIBC have been attached to the Final EIR as Appendix B. As stated on page 4.7-29 of the DEIR, Magnafloc is not expected to bioaccumulate in organisms, its chemical family (polyacrylamide) is relatively non-toxic, and it is not readily biodegradable into more environmentally problematic chemicals. The mineral process plant is a closed system and no process water would be in the mine water discharge from the site. As discussed above, any residue of these reagents remaining in sand tailings do not present a risk to the terrestrial and aquatic environments. Any monitoring requirements by the Central Valley Regional Water Quality Control Board for flotation reagents would be determined in the Waste Discharge Requirement process (see Master Response 8 – Mine Waste Characterization).

As demonstrated above, the proposed reagents that would be used during mineral processing would not adversely affect water quality in the surrounding environment.

Existing Mine Waste Fill at the Brunswick Industrial Site

Several commenters state that the number of samples for arsenic in existing rock and tailings at the Brunswick site is insufficient and that half of the Brunswick Site was not sampled for toxic metals. Figure 4.7-1 of the DEIR shows sampling locations conducted by NV5 inside the estimated boundary of historic waste rock fill as delineated on the figure. Areas outside of the sampled area of the Brunswick Site either would not be disturbed by the Project or are not potentially contaminated with historic mine waste rock. Therefore, the sampling of these areas of the Brunswick Site is not necessary. As discussed on page 15 of the Phase I-II ESA (Appendix J of the DEIR), the mine waste rock reportedly originated primarily from the New Brunswick Mine portion of the Idaho-Maryland Mine, which is known to have low arsenic concentrations, and also from the Empire Mine, which is known to contain elevated arsenic concentrations (see page 15 of Appendix J of the DEIR). As discussed on page 38 of the ESA, the mixed soil and rock fill beneath the southeastern paved area contain total and soluble arsenic concentrations that exceed regulatory benchmarks. Based on the higher arsenic concentrations and anomalous acid Based Accounting (ABA) results for this material, the geotextile fabric incorporated into the fill, and historical aerial photographs that suggest the grading was performed after mining operations were suspended, the material was likely imported to the site and did not originate from mining operations at the New Brunswick Shaft. As such, the DEIR's conclusion is based on evidence, not on mere speculation. Commenters also state that high concentrations of arsenic are associated with nearby mining sites, and conclude that rock from the Project will also have high arsenic concentrations. However, the Idaho-Maryland Mine is a different gold deposit and hosted in different rock types than the Empire-Northstar and Lava Cap Mines. Arsenic levels from samples taken in various rock types at the Idaho-Maryland Mine Project are low. (see Section 4.4 of Appendix K.2 of the DEIR.)

As a result, the level of Brunswick fill analysis conducted for the DEIR is sufficient to determine potential water quality and human health effects from historic contamination. The DEIR concludes that impacts would be less-than-significant with implementation of mitigation (DEIR, pg. 4.7-35, Mitigation Measure 4.7-2(a)).

Conclusion

The transportation of explosives in the United States is highly regulated and has an excellent safety record. Hauling of explosives for the project would occur using Brunswick Road to State Routes (SR) 20/49, which are designated as explosive transport routes by the CHP. The DEIR correctly concludes that the project's routine transport of explosives would result in a less-than-significant impact after implementation of mitigation.

This master response also demonstrates that the DEIR correctly concludes that proposed reagents in the project's mineral processing are not highly toxic to aquatic organisms and would not impact environmental water quality due to the closed system of the processing plant.

As shown in this master response, the DEIR adequately evaluated the Brunswick fill and includes sufficient mitigation to ensure that significant impacts to human health and water quality would not occur from Brunswick fill.

References

https://www.risegoldcorp.com/uploads/news_item/article/ARTICLE_91.pdf

Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets

Comments

Several commenters questioned whether there is a market for the barren rock and sand tailings material that will be sold after the engineered fill pads at the Brunswick and Centennial Sites are filled. Market demand per se is not a CEQA issue. However, many commenters expressed concerns about indirect effects of insufficient market demand for the project's engineered fill, such as the resultant need to stockpile barren rock and sand tailings on-site. Concerns have been expressed that the DEIR does not evaluate on-site stockpiles of overburden and the potential water quality impacts that could result if the material is contaminated.

In the event that there is market demand for engineered fill at off-site locations, several commenters expressed concern about the potential water quality impacts that could occur if project engineered fill (barren rock and sand tailings) is hauled to off-site locations and is contaminated.

Discussion

As described in Section 3.0 of the DEIR, after full placement of fill at the Centennial and Brunswick Industrial Sites to the pad design elevations, hauling of engineered fill (barren rock and sand tailings) would shift entirely to be utilized in local and regional construction markets.

As stated on page 4.8-50 of the DEIR, testwork completed on mine materials indicates that mine materials will likely be classified as Group C mine waste for the purpose of placement of engineered fill on the Centennial and Brunswick Sites. The proposed project would produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 - Historical Mine Waste at Centennial Site. The barren rock and sand tailings would undergo testing as part of obtaining WDRs for use in the engineered fill pads, and compliance with water quality objectives will need to be demonstrated

to the CVRWQCB prior to that placement (see Master Response 8 - Mine Waste Characterization).

Barren rock and sand tailings which are utilized in local and regional construction markets would be a mining product and not considered mining waste in the DEIR, except for purposes of formal characterization (Group A, B, or C), as required by the CVRWQCB, pursuant to Title 27 of the California Code of Regulations. [4] Nonetheless, as noted by the CVRWQCB in its April 4, 2022 comment letter on the DEIR, Rise would be required to include testing of the material to be sold for offsite use in the Characterization Plan that the CVRWQCB will require as part of the Report of Waste Discharge for the Project to ensure that such material would not pose a threat to water quality. While the material to be sold offsite would not be considered a mining waste, the CVRWQCB's requirement for testing to ensure no threat to water quality is analogous to the requirements for material to be considered Class C mining waste. Given the results of the testwork completed for the Project, which shows material is likely to meet requirements for Class C mining waste (i.e., no threat to water quality), any discharge related to use of barren rock and sand tailings for construction purposes is expected to be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Further, through the WDR process for placement of engineered fill, including the Characterization Plan that will require testing of material to be sold offsite, the barren rock and sand tailings will be thoroughly tested sufficient to determine its suitability for use as construction aggregate, and such testing will be under the authority of the CVRWQCB.

Prior to mining in any underground area, as part of mine planning, samples would be collected through underground core drilling and would then be tested for gold content and evaluated for chemical composition to confirm that it is similar in chemical composition to other material that has already been shown to meet Class C mining waste standards. Rock types that are significantly different than those previously shown to meet Class C mining waste standards would not be mined until mine waste characterization has been performed to ensure the rock will be suitable for offsite sale. Rock types that are not suitable for offsite sale would likely not be mined, and if mined, the waste rock would be placed underground. Waste rock and sand tailings from rock types found unsuitable for construction aggregate use due to water quality impacts would not be sold as construction aggregate. Mitigation Measure 4.8-1(e) has been modified in the FEIR to state that only mining products previously classified as Group C mining waste will be utilized for local and regional construction projects. As stated in the comment letter from the Central Valley Regional Water Quality Control Board, mining waste that is characterized and classified as Group C (i.e., discharge of the wastes that would be in compliance with water quality objectives other than turbidity) could be used as engineered fill with limited regulatory restrictions. The revised language of Mitigation Measure 4.8-1(e) is set forth below (additions in <u>double underline</u>, deletions in ~~strikeout~~):

> The applicant shall submit a RoWD and obtain WDRs from the Central Valley RWQCB for construction of the engineered fill areas. The WDR permit shall be received by the applicant prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites. Proof of coverage shall be provided to the Nevada County Public Works

[4] Barren rock (with no gold values and not processed) is differentiated from mineralized rock (with gold values which is processed) in the DEIR to facilitate an understanding of the proposed project. Barren rock is also proposed to be sold in some cases and therefore would be a mineral product and not waste rock. The tailings particles are primarily of sand size gradation (DEIR, Appx. H.1, p. 14.) and therefore sand tailings is an appropriate description in the DEIR. Barren rock and sand tailings are compacted in lifts to engineering standards in order to provide a useful surface appropriate for construction of future buildings on the sites and is therefore described as engineered fill. "Waste rock" is generally used in the DEIR to refer to rock removed from the mine, but not used for engineered fill purposes.

Department. As part of this process, the RWQCB will determine the appropriate mining waste classification for the proposed engineered fill, and will consider the following factors: (1) whether the waste contains hazardous constituents only at low concentrations; (2) whether the waste has no or low acid generating potential; and (3) whether, because of its intrinsic properties, the waste is readily containable by less stringent measures. The engineered fill areas shall be constructed in accordance with the Title 27 specifications, pursuant to the mining waste classification determined by the RWQCB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the placement of fill or fill site preparation disturbance at the Brunswick Industrial Site and Centennial Industrial Site. The RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant shall prepare and implement a Waste Characterization Plan (Characterization Plan) which shall be incorporated into the approved WDR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes shall be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e., sites other than the applicants Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization shall be established in the approved WDR.

The above changes to Mitigation Measure 4.8-1(e) are for clarification purposes and do not alter the conclusions of the DEIR. See also Response to Comment Agcy 5-4 (CVRWQCB Letter).

Evidence for Market Demand

The DEIR assumed that trucking of rock and sand would occur up to 60 miles, one way, from the Project site. This distance allows access to a large market area including most of Nevada County, and the Sacramento-Roseville region. These areas have demand for aggregate of over 25 million tons per year according to the California geological Survey,[5] as summarized in Table 2 below. The Project would produce approximately 182,500 tons of rock and 182,500 tons of sand per year, which is less than 2% of the yearly market demand for this area. Importantly, the Sacramento County aggregate production-consumption area has less than 50% of its 50-year aggregate demand currently permitted, which means there is a long-term shortage of construction aggregate and therefore a long-term market for the barren rock and sand tailings produced by the Project in that region. (see California Department of Conservation Mapsheet 52, 2018.) Specifically, Sacramento County had 327 million tons permitted of the anticipated 724 million ton 50-year demand as of the publication of Mapsheet 52 in 2018 by the California Department of Conservation.

[5] https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Map_201807.pdf

Table 2
Aggregate Demand within range of IMM Project

Nevada County	820,000
Yuba City-Marysville	6,880,000
Placer County	3,760,000
Sacramento County	14,480,000
Total	**25,940,000**

No large-scale temporary rock or sand storage facilities/stockpiles are proposed for the Project. The only storage of barren rock or sand tailings would be the temporary storage of materials at the Brunswick Shaft, inside the process plant, and at the Brunswick and Centennial Sites where material would be dropped by trucks and later graded and compacted during weekday daylight hours. If the Project's proposed engineered fill sites and the Brunswick and Centennial Industrial Sites were complete and there was low demand for barren rock or sand tailings, or the material was unsuitable for construction use, the operation would by necessity reduce or halt generation of these materials until an appropriate market, such as fill material or other use of rock material for which the material met appropriate specifications, could be identified. However, an adequate market for sale of the barren rock and sand tailings is expected, given the location of the Project site in proximity to the Sacramento market, which has an undersupply of construction aggregate.

Conclusion

This master response demonstrates that there is sufficient market demand for engineered fill (barren rock and sand tailings) after full utilization of the Centennial and Brunswick Sites engineered fill piles, thus, eliminating the need for on-site aboveground stockpiles. This response also demonstrates that the DEIR correctly concludes that the use of engineered fill at off-site locations would not result in adverse effects to water quality due to compliance with applicable State regulations, as required in DEIR Mitigation Measure 4.8-1(e).

Master Response 12 - Chemical Dust Stabilizers

Comments

Several commenters have raised concerns about the generation of dust from project construction and operations and resultant air quality effects. Select commenters have also asked for details on the composition and environmental effects of chemical dust stabilizers proposed to be used for the reduction of dust on unpaved haulage roads for the Project.

Discussion

The Project would use industry standard polymers as a chemical stabilizer to reduce haul road dust. This control type is highly efficient (74% to 94% dust control efficiency) with application approximately bi-weekly (see Table 11.1 of NIOSH 2nd edition Dust Control Handbook for Industrial Minerals Mining and Processing)[6]. These chemicals are not toxic air contaminants and therefore do not require evaluation in the Health Risk Assessment. Research by the US EPA has shown that these types of dust suppressant products have minimal to no adverse impacts on water quality and aquatic life relative to the use of water alone[7].

[6] https://www.cdc.gov/niosh/mining/UserFiles/works/pdfs/2019-124.pdf
[7] https://19january2017snapshot.epa.gov/www3/region9/air/dust/DustSuppressants-sept2008.pdf

Applicant Proposed Measure (APM) AQ-2 requires that during construction, all on-site roadways shall be paved as soon as possible after grading and any unpaved gravel roads shall be treated with chemical stabilizers in order to control fugitive dust (see page 4.3-65 of the DEIR). This measure will be required as a mandatory condition of approval for the Project. The air quality model presented in Appendix E.1 of the DEIR assumes the use of chemical stabilizers for reduction of dust by 80% for vehicle traffic on certain unpaved roads during construction (see page 300 of Appendix E.1). Notably, chemical dust stabilizers are not assumed for emissions reductions from unpaved roads during operations in the DEIR. This is a conservative assumption as dust emissions from vehicle traffic on unpaved access roads are estimated at 18.7 pounds per day (see page 303 of Appendix E.1) with the use of water for dust suppression (55% dust control efficiency). If chemical stabilizers are used for unpaved access roads during operations a substantial reduction in dust may be achieved versus the assumed emissions for the analysis in the DEIR.

From a health perspective, the Health Risk Assessment (HRA) prepared for the proposed project ((included in Appendix B of Appendix E.1 of the EIR) evaluated fugitive dust as PM_{10}. The HRA concluded that a significant health hazard to the public would not occur as a result of fugitive dust after implementation of mitigation (see DEIR, p. 4.3-82). For more detail, please refer to Master Response 20 – Conservatism Used for Metals in Dust, Master Response 21 – Silica Health Risk, and Master Response 22 – Conservatism Used for Asbestos Assessment.

Conclusion

This master response confirms that the proposed project will use chemical dust stabilizers that are not considered toxic air contaminants, nor do they have adverse effects on water quality or aquatic life. This response also demonstrates that, after implementation of mitigation, the project's construction and operations would not expose sensitive receptors to substantial concentrations of fugitive dust such that a human health effect would occur (Appendix G, III(c)).

Master Response 13 - Historic Hydrogeologic Assessments

Comments

Several commenters have questioned why the hydrogeologic analysis in the Rise Gold DEIR is different than that used in the prior 1995 and 2008 EIRs produced for the Emperor Gold and Emgold projects; and specifically questioned why the area of potential dewatering impact is different (i.e., reduced) in the current analysis. As discussed below, the 1995 and 2008 EIRs relied on less sophisticated groundwater models that did not account for regional groundwater flow or the impact of streams, which resulted in a less accurate analysis and slightly different conclusions regarding the area of dewatering impacts.

Discussion

The Idaho-Maryland mine has been the subject of two previous environmental impact reports in 1995 and 2007 by Emperor Gold and Emgold, respectively. The current applicant, Rise Grass Valley, is not affiliated with the previous applicant.

The Groundwater Model (2020) prepared by Itasca (Appendix K.3 of the EIR) is a groundwater flow model that was constructed to solve 3-D groundwater flow problems using the finite-element method. The model simulates hydrostratigraphic units, rivers and creeks, precipitation and recharge, underground workings, and historic mining. The groundwater model was calibrated on historic groundwater inflows into the mine, the current and historical water level in the Union Hill Mine, the current water level in the New Brunswick Shaft, ground measured water levels in domestic water wells in the area and base flow rates of Wolf Creek and South Fork Wolf Creek.

Previous hydrogeological assessments did not use groundwater models and relied on less sophisticated analytical solutions to estimate impacts to domestic water wells. Consequently, the prediction of ground water drawdown is much more in-depth, robust and reliable than previous assessments. Nevertheless, despite the simplified analytical solutions used by previous assessments, these assessments came to similar conclusions regarding the potential area of impact to domestic water wells as the current analysis.

In the 1995 EIR, Sierra-Pacific Groundwater Consultants, prepared a hydrogeological assessment of the potential impact of mine dewatering on domestic wells. In that assessment, an analysis was conducted involving the distance from the bottom of the well to the nearest underground mine working and estimates of inflow and outflow of groundwater (Q) at each well location. An unconventional method was used in the determination of each component of the Darcy equation which was used to estimate inflow and outflow for each well. Notwithstanding the unconventional application of data to Darcy's Law, the results of the analysis indicated that wells closest to the workings were at greatest potential risk for dewatering impacts. (pages 18-19, Todd 2007). In the 1995 Emgold Final EIR, 15 wells were considered High Risk, with partial and complete dewatering highly probable, and 2 wells Moderate Risk with partial dewatering of wells probable and complete dewatering of wells possible. Other wells in the Study Area were categorized as low or very low risk wells with partial dewatering of wells improbable and complete dewatering of wells highly improbable. The Study Area and wells from the 1995 Final EIR are shown in Figure 9 through Figure 14 below. As shown on Figure 9 and Figure 10, the majority of the wells considered High or Moderate Risk for dewatering impacts in the 1995 EIR are in the E. Bennett Road area, in which the current project proposes to connect to the NID potable water system. The 1995 EIR also found five wells south of E. Bennett Road and nearby South Fork Wolf Creek (Wells #128, 240,113,233,236)[8] to have dewatering impacts; however, these wells were not found to have the potential for significant dewatering under the Itasca model used in the DEIR. The 1995 hydrologic assessment does not model the regional groundwater flow and simulations of streams, which is why these five additional wells were found to have dewatering impacts in 1995. Conversely, by using a comprehensive Groundwater Model, rather than simplistic analytical methods used in 1995, Itasca determined that the influence of a shallow groundwater table and recharge from South Fork Wolf Creek limits groundwater drawdown in the valley bottom south of E. Bennett Road, resulting in no significant dewatering impact to these 5 wells south of E. Bennett Road and nearby South Fork Wolf Creek. Please see Master Response 33 – Groundwater Dependent Vegetation.

In connection with the 2008 EIR for Emgold, Todd Engineers prepared a hydrogeologic analysis that estimated an impact area using an analytical equation which assumed the mine workings would behave as a pumping well within the groundwater system. Todd estimated that a cone of depression would form and declines in the groundwater system could be anticipated in a zone of approximately 710 feet around the mine workings. Todd used the formula $r^2 = 0.3Tt/S$, where r= distance to the point of zero drawdown, T = transmissivity, t = time for the cone of depression to reach steady state, S = storativity of the aquifer. Todd uses a T value of 84 gpd/ft, S value of 0.01, and t of 200 days to calculate a radius of 700 feet. A conservative and simplifying assumption is made that the zone of impact will expand equally away from the outer edge of all the workings regardless of depth of extent of workings. As such, the calculated radius of influence was applied to all areas of the workings, no matter how deep or small in volume the workings may be in some areas. Eighteen wells were considered to have the highest potential risk of impacts from

[8] Note that Figure 1 shows Well #205 as a high risk well but this well is not present in the high and moderate risk tables and is an error in the historic figure. This well is in the very low risk table of the 1995 Final EIR.

dewatering and Todd concluded that actual impacts will likely be less than predicted due to the conservative nature of the analysis. (pages 20-22, Todd 2007).

As shown in Figure 15, the area of potential impact in the 2007 Todd report included the E. Bennett Road area and extended approximately 0.5-mile east of Brunswick Road. As noted previously, the radius estimated by Todd was to the point of zero drawdown and no attempt was made to quantify whether an insignificant amount of drawdown would actually impair the use of a domestic water well. Todd conducted a sensitivity analysis by increasing pumping time from 200 days to 730 days to illustrate how increased pumping would impact the analysis with a resulting radius of influence increased to 1,356 feet. (see page 23 of Todd 2007). This sensitivity scenario was used in the 2008 Emgold DEIR which categorized 18 wells as high-risk wells and 18 wells as moderate risk wells. (see page 4.7-33 and Figure 4.7-3 of ESA 2008). Figure 16 below shows the Areas of Potential Impacts from the 2008 DEIR. The extended area of impact, to the point of zero drawdown, used in the 2008 DEIR is similar the 2-foot drawdown contour predicted by the Groundwater model for the current Rise Gold DEIR (see Sheet 12 of Appendix K.2).

Notably, Todd Engineers submitted a comment letter on the 2008 DEIR and disagreed with the 2008 EIR preparers use of its sensitivity scenario by ESA to categorize risks to wells and stated "Based on the analyses in our 2007 report and in this memorandum, it is not technically defensible to expand the zone where the highest level of mitigation would be required. We recommend that the 710-foot zone, in addition to the area of the workings footprint, be maintained as the area with the highest level of mitigation for a permanent surface water supply." In other words, Todd's opinion was that the 2008 EIR inappropriately expanded the likely area of dewatering and associated groundwater impact based on a mischaracterization of its report.

Todd also stated that the lone drift (underground tunnel) at the 1,100-foot below surface level that extends east of Brunswick Road would not likely contribute to water level decline during dewatering. (see page 5 of Todd comment letter – Todd 2008). In its comment letter, Todd provided a revised figure, shown as Figure 17 below, which shows the high and moderate risk areas recommended for a permanent water supply, generally confined to the E. Bennett Road area. This is a very similar result to the conclusions of both the 1995 hydrogeologic study and the current DEIR.

Conclusion

The conclusions of the hydrogeologic analyses used in the 1995 and 2008 EIRs are substantially the same as the conclusions in the Rise Gold EIR, and there are only minor differences in the overall conclusions, which are explained by the different modelling methods. In general, the practical result of these differences is that the previous hydrogeologic assessments predicted more wells would be impacted by dewatering as compared to the current DEIR's findings. However, as shown above, the number of impacted wells is not substantially greater than that which is predicted in the current DEIR, and said DEIR includes mitigation measures (MMs 4.8-2(a-c)) to ensure that impacts to groundwater wells (Appendix G, X(b)) are reduced to a less-than-significant level.

Figure 9
Map of Well Study Area from 1995 Final EIR

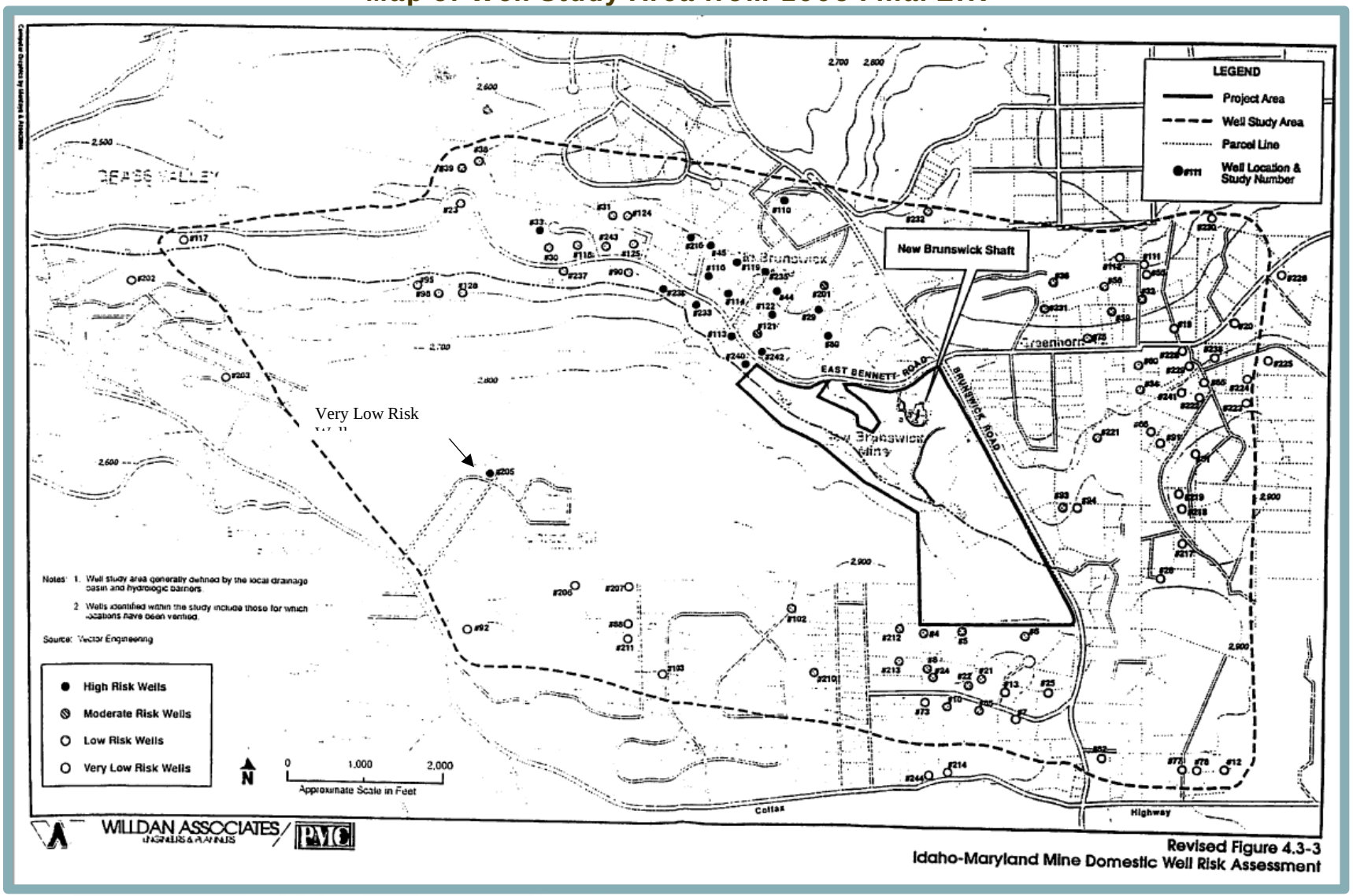


Figure 10
High and Moderate Risk Wells from 1995 Final EIR

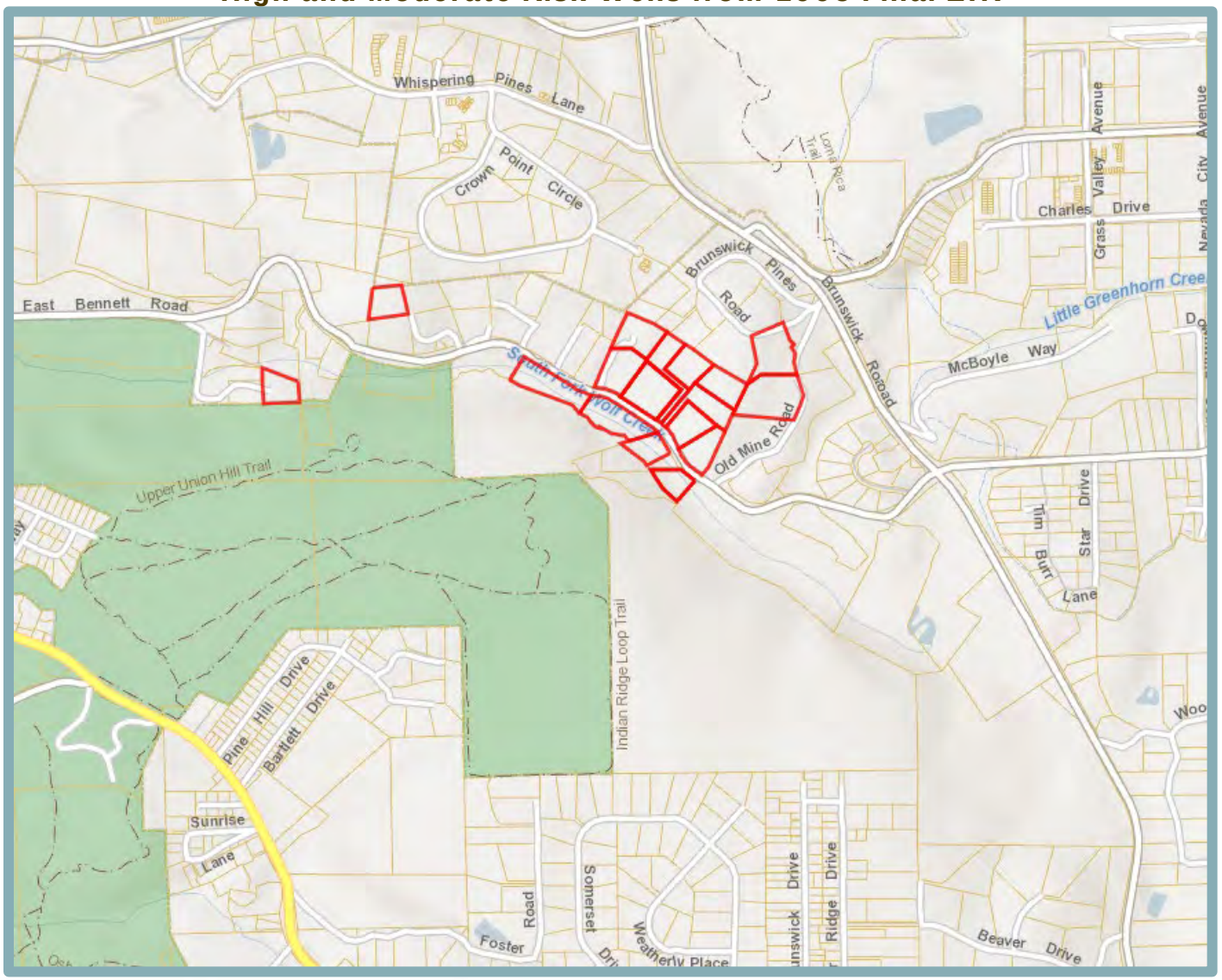


Figure 11
Table of High-Risk Wells from 1995 DEIR

TABLE 4.3-1
Idaho-Maryland Mine Well Risk Assessment
High Risk Group of Wells
(Partial or Complete Dewatering of Wells Highly Probable)

Assessors' Parcel Number	Wells's Study Number	Est. Change GPD Q_i-Q_o	Well to Mine Vertical Distance (ft)
09-320-03	128	(0.74)	730
09-590-09	33	(6,132.89)	836
09-600-17	116	(799,059.99)	635
09-600-16	45	(174,968.92)	618
09-581-34	113	(11,044.74)	413
09-600-04	114	(89,983.97)	645
09-600-12	119	(146,769.70)	548
09-600-15	122	(15,326.33)	263
09-600-14	44	(26,845.32)	318
09-581-17	29	(1,506,504.28)	186
09-581-13	80	(686,882.03)	503

Figure 12
Table of additional High-Risk Wells from 1995 Final EIR

TABLE 4.3.1
PART II

IDAHO-MARYLAND MINE WELL RISK ASSESSMENT
HIGH RISK GROUP OF WELLS
(PARTIAL AND COMPLETE DEWATERING OF WELLS IS HIGHLY PROBABLE)

Assessors' Parcel Number	Wells' Study Number	Change GPD Q_i-Q_o	Well to Mine Vertical Distance (ft)
09-581-47	233	(74,455)	693
09-600-13	235	(163,892)	518
09-581-49	236	(22,408)	576
09-581-30	240	(8,307)	271
09-600-11	242	(56,168)	363

Figure 13
Table of Moderate-Risk Wells from 1995 DEIR

TABLE 4.3-2
Idaho-Maryland Mine Well Risk Assessment
Moderate Risk Group of Wells
(Partial Dewatering of Wells Probable)
(Complete Dewatering of Wells Possible)

Assessors' Parcel Number	Well's Study Number	Est. Change GPD Q_r-Q_o	Well to Mine Vertical Distance (ft)
09-600-10	121	18,958.59	358
NA	UH	18,686.82	123

Figure 14
Table of additional Moderate-Risk Wells from 1995 Final EIR

TABLE 4.3.2
PART II

IDAHO-MARYLAND MINE WELL RISK ASSESSMENT
MODERATE RISK GROUP OF WELLS
(PARTIAL DEWATERING OF WELLS PROBABLE)
(COMPLETE DEWATERING OF WELLS POSSIBLE)

Assessors' Parcel Number	Wells' Study Number	Change GPD Q_r-Q_o	Well to Mine Vertical Distance (ft)
09-581-19	201	18,841.5	285

Figure 15
Area of Potential Impact from 2007 Todd Engineers

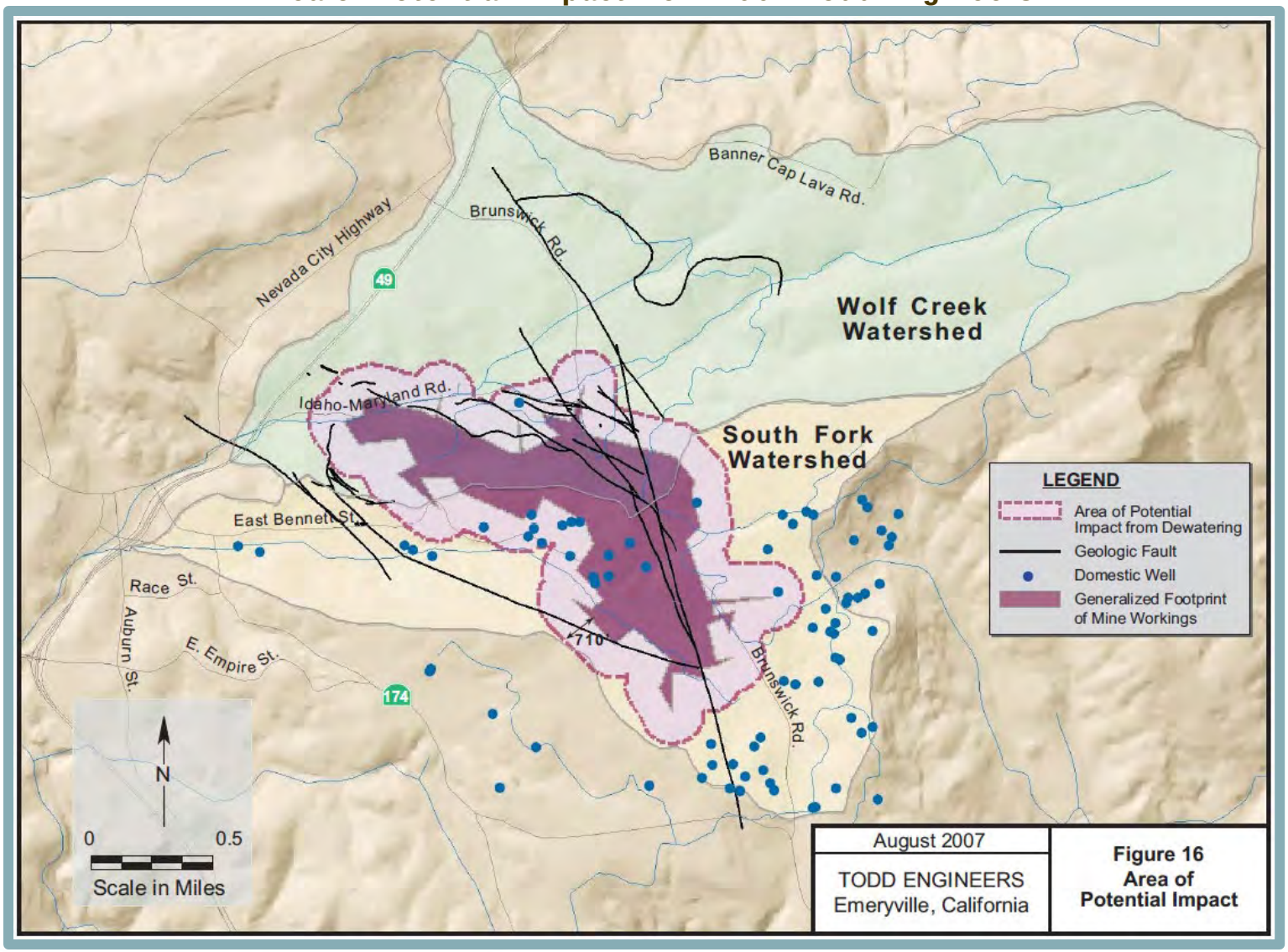
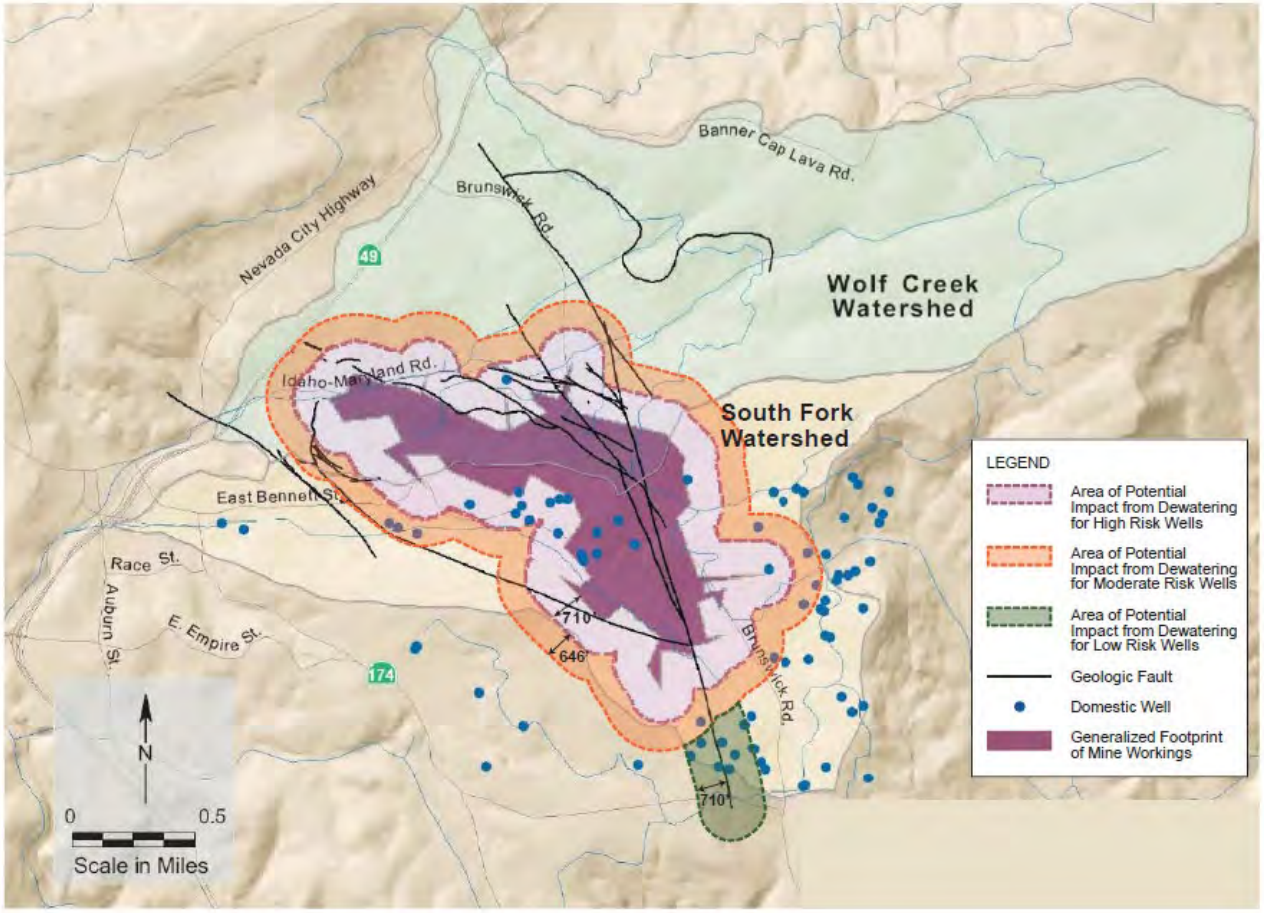


Figure 16
Areas of Potential Impacts from 2008 DEIR



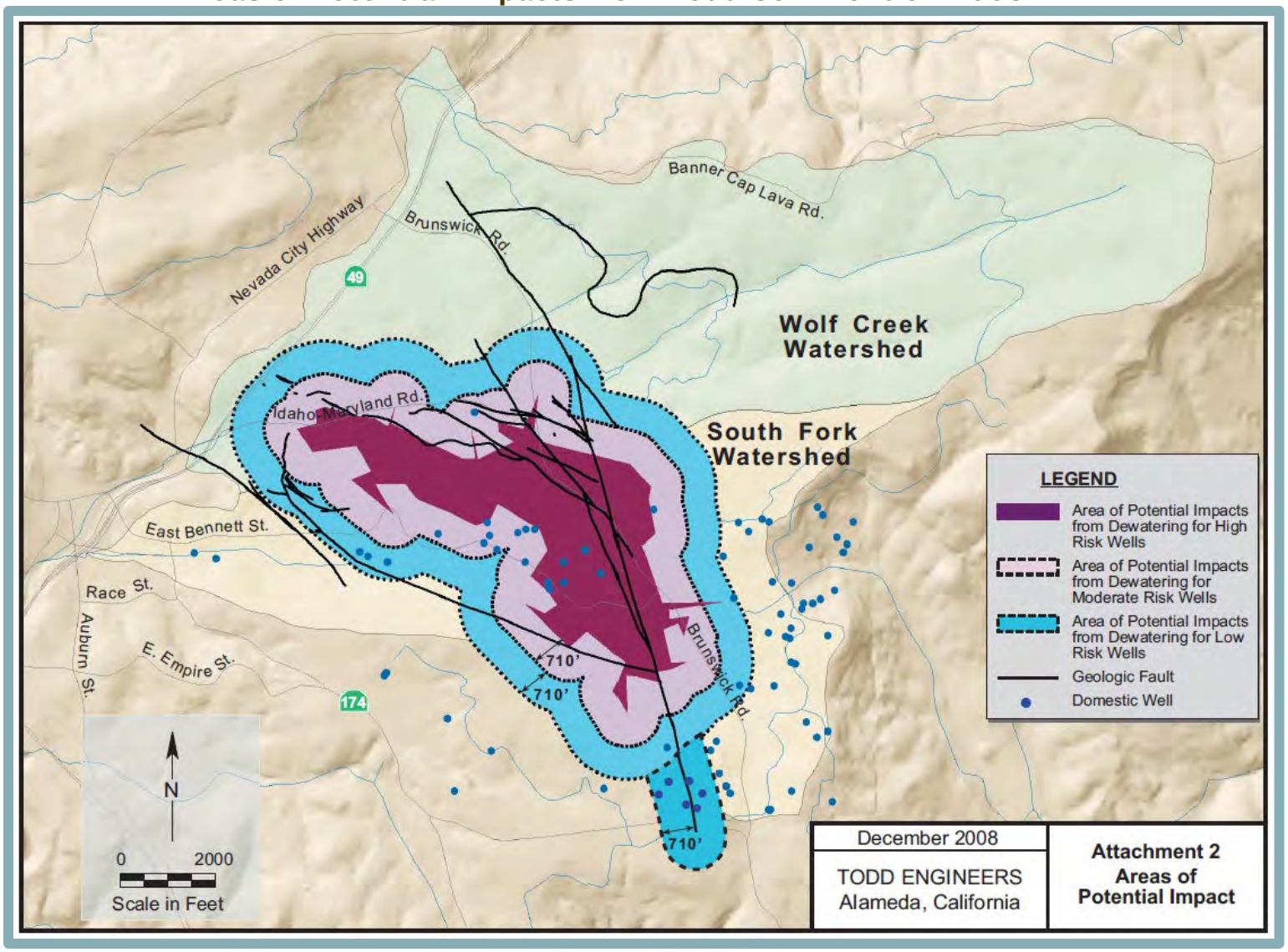
SOURCE: Todd Engineers, 2007; and ESA, 2008

NOTE: The Area of Potential Impact from dewatering for Very Low Risk Wells is outside the areas defined for the High Risk, Moderate Risk, and Low Risk Wells Areas of Potential Impact.

City of Grass Valley Idaho-Maryland Mine Project . 205379

Figure 4.7-3
Areas of Potential Impacts from Dewatering

Figure 17
Areas of Potential Impacts from Todd Comment on 2008 DEIR



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Master Response 14 - Adequacy of Groundwater Model

Comments

Several commenters disagree with the methods and conclusions of the groundwater model, asserting such things as the model is not appropriate for use in fractured rock, the data from private wells is old and not sufficient for modelling purposes, and the modelling period does not represent the full 80-year operational life of the mine. This master response demonstrates that the groundwater model (MINEDW) used to predict the project's potential impacts to groundwater (Appendix G, X(b)) is a robust model that has a long history of use with accurate results, and is appropriate for use in evaluating the dewatering effects of the proposed project.

Discussion

As stated in Section 4.0 of Appendix K.3 of the DEIR, the groundwater flow model that was constructed for this investigation utilizes the numerical code MINEDW, which was developed by Itasca (2012) to solve 3-D groundwater flow problems with an unconfined (or phreatic) surface using the finite-element method. MINEDW is a commercial software that was thoroughly reviewed by Sandia National Laboratories (Corbet et al. 1998). MINEDW has been used at more than 100 mine sites located throughout the world and in diverse hydrogeologic and climatic conditions. MINEDW has been in use for approximately 30 years, and its predictions have been validated by field data collected over many years (see Appendix A of Appendix K.3 of the DEIR) and recognized as valid by the Nevada Division of Environmental Protection for use in permitting applications.

MINEDW Model is Acceptable Industry Practice for Use in Fractured Rock

Several commenters have stated that the model is not appropriate for use in a fractured rock. The conceptual model proposed by Itasca, in simple concepts, is that the shallow bedrock is significantly fractured so that it behaves hydraulically like a porous media. This is consistent with analysis of well data (see Section 3.3 of Appendix K.2 of the DEIR). Below the shallow, fractured bedrock is the intact bedrock whose fractures are closed due to the vertical stresses caused by the overlying bedrock. The intact bedrock also behaves as a porous media in that groundwater flow is primarily through the extremely small pores in the rock. Itasca assigned low hydraulic conductivities and storage coefficients to the intact bedrock in which mining will occur. The application of a continuum (porous media) approximation is applicable to mining projects in that it is used generally to estimate flows from the mine and drawdowns in water levels due to dewatering, a situation similar to predicting well yields. Please see Reponses to Individual Letter 232 for an in-depth discussion on this topic.

The MINEDW for the DEIR was calibrated on historic groundwater inflows into the mine, the current and historical water level in the Union Hill Mine, the current water level in the New Brunswick Shaft, ground water levels measured in domestic water wells in the area, and base flow rates of Wolf Creek and South Fork Wolf Creek. As described in Section 4.6 of the Groundwater Model Report (Appendix K.3 of the DEIR), Itasca conducted transient model calibrations by matching the change of groundwater levels at the Union Hill Mine and groundwater inflows to the historical mines. The simulated and measured ground water levels from domestic water wells in the area and the measured water level in the New Brunswick shaft were compared. The simulated groundwater levels were within the ranges of measured water levels for domestic water wells in the area and the simulated mine-water level is essentially the same as the measured water level in the New Brunswick shaft. The hydraulic conductivity (K) values derived from the groundwater flow model calibration for different geologic units were found to be within the ranges of the estimated K values and literature values.

Private Well Data Used in Model

Several commenters state that data from private wells is old and is limited to a few years without usage data provide. Contrary to the commenters' assertions, water level data has been collected for many years over a period spanning two decades. As stated on page 26 of Appendix K.2, monitoring of water level in wells for up to 79 wells was undertaken from 1995-2001 and 2003-2007. As noted in the report, no long-term increasing or decreasing trends are observed in the data. Therefore, the age of the sample data does not limit the usefulness of this data. Nevertheless, no groundwater level measurements have been completed since 2007, which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of all 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Despite this, the analysis in Chapter 4.8 of DEIR has determined that the Project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures. As stated on page 4.8-67 of the DEIR, implementation of Mitigation Measures 4.8-2(a), (b), and (c) would reduce the project's groundwater impacts to a less-than-significant level.

Model Calibration

Several commenters believe that more flow measurements from the mine drains are required for calibration of the groundwater model. However, the current flow rate of mine water from the drains was not used for the calibration of the groundwater model. The current flow rate of mine water from the drains was not used for the calibration of the groundwater model because the preferential pipe flow in the mine workings is not simulated in the model and the purpose of the model is to calibrate to "current" groundwater levels, based on measurements taken from 1994 through 2007, and the current water level in the mine which is controlled by the drain outlet elevations. Additionally, there could be additional preferential recharge from surface runoff through mine workings reporting to the drains. This extra recharge, not related to groundwater flow, is not quantifiable and could result in inaccurate calibration of the groundwater model. Accordingly, the

commenters' requests for inflow/outflow data is not relevant to the groundwater model and the assessment of groundwater impacts.

Modelling the Project's Long-Term Mining Effects

Several commenters assert that the groundwater model should be run for an 80-year period rather than 65 years. The groundwater model was based on the expected mining plan during year one to year 25, and then Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario confirm that the added potential mining (beyond the 65 years modeled) will not lead to significant incremental drawdowns as the mining progresses because the mining activities occur in deep, low hydraulic conductivity rocks. The decrease in fractures and hydraulic conductivity with depth is well documented. As stated on page 4.8-8 of the DEIR, the U.S. Geological Survey (Page et al., 1984) conducted a study covering a 148-square mile area of southwestern Nevada County, including the segment of the Wolf Creek watershed from Grass Valley to the Bear River. The underlying bedrock consisted of similar rock types to those encountered at the project site, including hard, dense metavolcanic and igneous rocks of pre-Tertiary age. The study results found that the degree of fracturing in the bedrock, and thus the well yield, decreases with depth, with most of the available groundwater occurring above a depth of 215 feet below the ground surface (bgs). At depths shallower than 215 feet bgs, 70 percent of the wells evaluated produced more than five gallons per minute (gpm). However, at depths deeper than 215 feet bgs, 75 percent of the wells produced five gpm or less. As stated on page 4.8-16 of the DEIR, EMKO reviewed 38 well completion reports within a 1- to 2-mile vicinity of the Project, which contained information regarding the total drawdown that occurred and the pumping rate achieved during initial testing of the wells immediately after they were drilled. A clear correlation exists between pumping rate and depth. The maximum pumping rate achieved was 125 gpm in a well with a total depth of 123 feet bgs. In contrast, at depths of 200 feet or deeper, the maximum reported pumping rate is 50 gpm. Below a depth of 300 feet, the maximum pumping rate reported was 10 gpm, and below a depth of 450 feet, the maximum pumping rate reported was only four gpm. Similarly, Todd Engineers (2007) developed a relationship between the hydraulic conductivity and depth based on information from approximately 300 driller reports. Todd Engineers (2007) found that the hydraulic conductivity of the fractured bedrock penetrated by the domestic supply wells in their study area varied significantly with depth, with greater values at shallower depths where more fractures are prevalent, and with much lower values at deeper depths, where fractures may be either less common or have smaller aperture (open) widths.

Thus, the DEIR and the associated groundwater modelling for the proposed project adequately addresses the full potential extent of the project's groundwater impacts as required in Appendix G, X(b).

Conclusion

As stated on page 4.8-41 of the DEIR, the County's independent expert West Yost found that the groundwater model was acceptably calibrated pursuant to industry practices, and adequately represented the Project's expected impacts. Accordingly, the DEIR contains concurrence of multiple experts on the suitability of the groundwater model and as such, constitutes substantial evidence of the significance determination that, after implementation of mitigation, the proposed

project would result in a less-than-significant impact related to substantially decreasing groundwater supplies (Appendix G, X(b)).

Master Response 15 - Adequacy of Groundwater Monitoring Wells

Comments

Several commenters have questioned the adequacy of the Groundwater Monitoring and Mitigation Plans required for the Project. The majority of concerns focus on 1) the use of a groundwater monitoring well network in the potential area of drawdown, rather than direct monitoring of domestic wells in the area; and 2) lack of monitoring throughout the entire mineral rights area. The alleged implication of the above concerns is that the groundwater monitoring required for the proposed project is inadequate, and thus, will not detect the full extent of wells that will be impacted by the project's dewatering.

Discussion

The analysis in the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation (see page 4.8-66 of the DEIR).

Groundwater Monitoring Plan

A rigorous groundwater monitoring plan (GMP) will be implemented by the applicant to assess how the hydrogeologic system responds to mining. This response to dewatering cannot be measured until mine dewatering commences; however, Mitigation Measure 4.8-2(a) requires that the monitoring wells be installed prior to dewatering. Mitigation Measure 4.8-2(b) requires that if it is determined, based on the GMP, that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified. Mitigation measures are achievable, enforceable, and capable of reducing the Project's impacts. The GMP along with the requirement that the applicant provide water to 30 parcels and provide water to any other parcels with wells that are impacted by the Project ensures that the mitigation is enforceable by the County, achievable through water supply replacement requirements, and capable of reducing the Project's impacts.

Several commenters assert that groundwater monitoring networks need to be installed prior to dewatering. This is already required at least 12 months in advance per Mitigation Measure 4.8-2(a). This water level monitoring will provide the baseline levels prior to dewatering. The collection of 12 months of baseline data allows for the seasonal change in water levels at each location to be captured. As described in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations between wet and dry times of the year but have remained relatively consistent from year to year within each individual well. No groundwater level measurements have been completed since 2007. However, impacts to domestic water wells will be measured against the current measurements of water levels, collected in the 12-month period, and not historic water levels.

The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The collection of water quality information, as discussed in Section 8.0 of Appendix K.8, from the proposed monitoring wells would also be completed and would be representative of the baseline

water quality in domestic water wells in the area. Hydraulic testing of monitoring wells would be conducted as described in Section 6.0 of Appendix K.8.

As previously noted, a GMP is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Monitoring wells will be specifically designed and constructed for monitoring purposes. Use of monitoring wells is preferable to monitoring of domestic wells because of uncertainties in the design, construction and operating conditions in domestic wells (pages 2-3 of the GMP, Appendix K.8 of the DEIR). The monitoring wells will be representative of the surrounding domestic water wells because they will be constructed at representative locations and depths.

As stated in Section 3.0 of the GMP, the drawdown caused by Project dewatering will propagate outward over time. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As discussed in the GMP, 30 groundwater monitoring wells will be installed at 15 locations. The locations of the monitoring wells are strategically placed between the mining zone and domestic wells to monitor the potential drawdown extent as the result of mining and assess the potential impacts on domestic wells. As stated in Section 7.0 of Appendix K.8, each monitoring well will be equipped with a downhole submersible data logger that will record water levels over time. The data logger will be programmed to collect water-level information on a periodic basis, such as once every 1 to 4 hours. As stated on page 10 of Appendix K.8, drilling and well installation activities will be performed under the supervision of a California-Registered Geologist. Qualified hydrogeologists would evaluate the data from groundwater monitoring.

Groundwater drawdown will be measured at the proposed monitoring wells and then used, in conjunction with data collected by the Domestic Well Monitoring Program (see below), to predict an impact to a domestic water well before any well production impact from dewatering could occur. The impact will be determined using the threshold set forth in the Well Mitigation Plan.

Water Quality Monitoring

Several commenters have raised concerns that their well could be contaminated by mine dewatering through the outward flow of alleged contaminated groundwater within underground mine workings. As stated on page 4.8-48 of the DEIR, the, dewatering causes a low-pressure area around the underground workings such that groundwater inflow is toward the mine, not away from the mine toward the domestic wells. Blasting or backfilling with CPB would be conducted exclusively within the underground mine workings. Thus, any water that contacts those components would be present only within the mine workings and would be then pumped out of the mine workings by the dewatering system and into the clay-lined pond for further water treatment. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or



otherwise substantially degrade surface or groundwater quality. As stated on page 4.8-51 of the DEIR, the proposed mining areas would primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at greater depths, typically more than 1,000 feet below the surface and deeper. At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, due primarily to the lack of open fractures as a result of the large pressures exerted by the overlying rock mass (i.e., the lithostatic pressure). Given that the new mining activity would occur at equivalent or greater depths than the proposed mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater in the domestic supply wells that are completed at much shallower depths.

Notwithstanding the above, as noted below in this master response, to provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the Project requiring that monitoring of domestic water wells will be conducted upon request for property owners within or nearby the predicted 1-ft drawdown isopleth of the Project. These 378 properties are listed in Table 3 and shown in Figure 18 below. Included in this Domestic Well Monitoring Program is water quality sampling to monitor potential changes in water quality over time.

Well Water Quality Would Not be Impacted from Changes in Groundwater Flow Paths

Several commenters expressed a concern with the potential water quality degradation in domestic wells that may be caused by lowering of the water table and associated changes in groundwater flow paths. In response, Itasca prepared several figures of the modelled water levels at three time periods (attached to the FEIR as Appendix C); Pre-mining (before any historical mining activity), 2019 (the present/baseline condition), end of future mining (after 25 years of mining). The water levels are shown at a larger scale using 50-foot contours. However, the figures demonstrate that the drawdown during mining only has a minor effect on a few of the contours, and at a very local scale. The overall regional groundwater flow paths are not altered. As such, there would not be sufficient changes in actual groundwater levels in wells to cause groundwater with naturally-occurring arsenic to be pulled to different locations. As demonstrated by the figures attached as Appendix C to the FEIR, water quality impacts to domestic wells due to changes in water quality flow direction would only occur if the mining changed the actual groundwater levels by hundreds of feet. There is no evidence or precedent for an effect of that magnitude. Rather, the model predicted drawdown of 10 ft is localized well within the Rise mining boundary. As such, water quality impacts to domestic wells are speculative impacts that do not require analysis under CEQA.

Well Mitigation Plan

Mitigation Measure 4.8-2(b) requires that if it is determined, based on the GMP, that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified. As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the East Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The 10% drawdown threshold of significance is extremely conservative and, in most cases, would not lower the water level below the casing of the domestic well.



Therefore, well mitigation may not be required after inspection. If reduction of the water column was great enough to reduce the well's yield, a simple adjustment to the pumping system may only be required. For example, by installing or increasing the size of a pressure or holding tank and pumping at a lessor rate over a longer duration, if necessary. The Well Mitigation Plan has been edited to clarify the range of actions and procedures that would be taken under the Well Mitigation Plan and the performance standards required for Well Mitigation. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D.

Analysis of Dewatering Effects Outside East Bennett Area

Several commenters have stated that the water supply for wells outside of the E. Bennet area must be analyzed in the DEIR. The analysis provided in Section 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. No significant impacts to domestic water wells are predicted in other areas based on technical analyses. The predictions include the use of a 100% safety factor, multiple sensitivity scenarios, and have been peer reviewed by the County's independent expert consultant. The future mitigation of wells outside the East Bennett area, if any, and method of mitigation are speculative as the DEIR does not predict any significant impact in these areas, and CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Therefore, as an impact of water supply to wells outside of the East Bennett area is not predicted, such analysis is speculative and need not be analyzed in the DEIR.

Water Supply Compensation to Impacted Property Owners

Several commenters state that the applicant should pay for water for any parcel connected to NID water supply for the life of the mine, even after the parcel is sold or annexed into the City of Grass Valley. The Well Mitigation Plan (Appendix K.9 of the DEIR) takes a conservative approach and presumes that an owner who decides to connect to the NID system has been impacted by and at the fault of the mining operation, even if no impact to groundwater well supply has occurred. As such, the Well Mitigation Plan was designed to be even more conservative than Nevada County General Plan Policy 17.12, which requires an impact as a prerequisite to the obligation to pay for water, which policy states "if it is determined that the operator is at fault, impacted owners shall be compensated by the operator." A new homeowner would not be impacted because the impact would have previous occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID's water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City, which allows water wells to be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

Domestic Well Monitoring Program

A number of property owners in the area surrounding the Idaho-Maryland Mine Project have expressed concerns about the Project's impact on their domestic wells, both in terms of drying up their well(s) and adversely affecting well water quality.

To provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the Project requiring that monitoring of domestic water wells will be conducted upon request for property owners within or nearby the predicted 1-ft drawdown isopleth of the Project. These 378 properties are listed in Table 3 and shown in Figure 18 below. Some of these properties do not have a domestic water well but to ensure that well owners are not excluded all owners will be contacted by the Company. Certain areas, including the City of Grass Valley, Loma Rica Industrial Area, Tim Burr Lane / Star Drive, Cedar Ridge, The Cedars, New Brunswick Court, and Brunswick Pines are known to already be serviced by NID potable water as shown in Figure 19. Property owners in these areas will not be contacted. Please see Appendix E to this Final EIR for the Domestic Well Monitoring Program.

The following measures have been added to the Domestic Well Monitoring Program, and shall be included as a condition of approval for the Project:

1) Property owner's shown in Table 3 will be contacted at least three months prior to commencement of the required 12-month groundwater monitoring period and the company will request permission to inspect and install monitoring equipment at the well.
2) Property owners who respond and grant permission for well monitoring will be added to the Domestic Well Monitoring Program.
3) The well will be inspected to determine the characteristics of the well, including location, well depth, casing and screen depth, static water level, and well yield. A water quality sample will be taken during the inspection.
4) Instrumentation will be installed to measure water level on a periodic basis (such as 1 or 4 hours) and pumping rates (to correlate water level with the wells use). Data from the instruments will be transmitted by telemetry.
5) Water level data will be collected for at least 12 months prior to the commencement of mine dewatering and will continue throughout the period of initial mine dewatering (dewatering of the historic mine workings) and for at least the first 5 years of operations.
6) All data collected and reports generated will be provided to the property owner and to Nevada County.
7) All costs of well monitoring will be paid by the company and well monitoring equipment will remain the property of the company. A property owner may terminate well monitoring upon request and the company will remove any installed monitoring equipment.
8) For any well that is monitored under the Domestic Well Monitoring Program, monitoring results will be used to supplement the analysis from the Groundwater Monitoring Plan to determine whether an individual groundwater well is expected to be impacted or has been impacted by dewatering operations, using the threshold set forth in the Well Mitigation Plan.

Figure 18
Properties Eligible for Domestic Well Monitoring

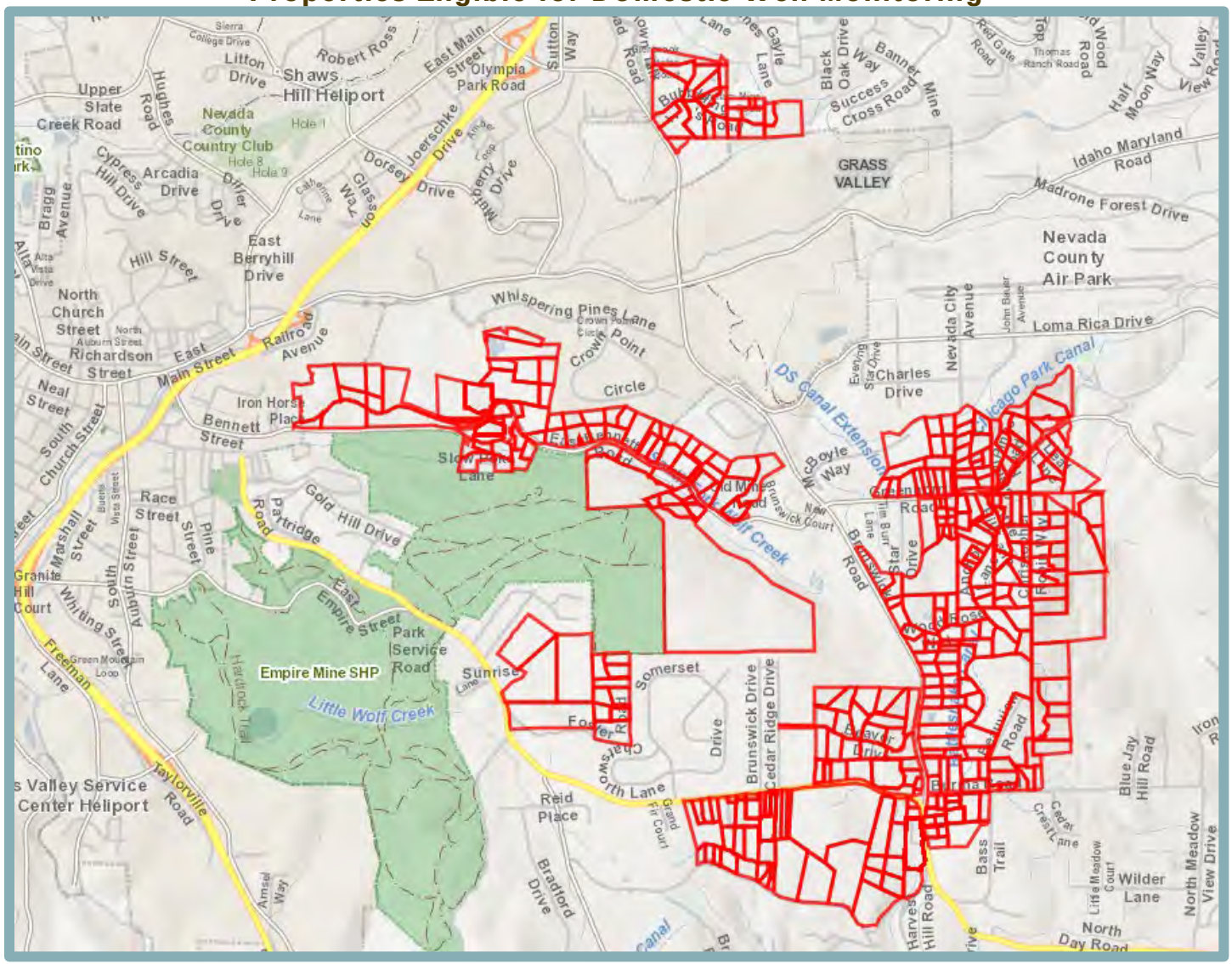


Figure 19
Areas Known to be Supplied by NID Potable Water

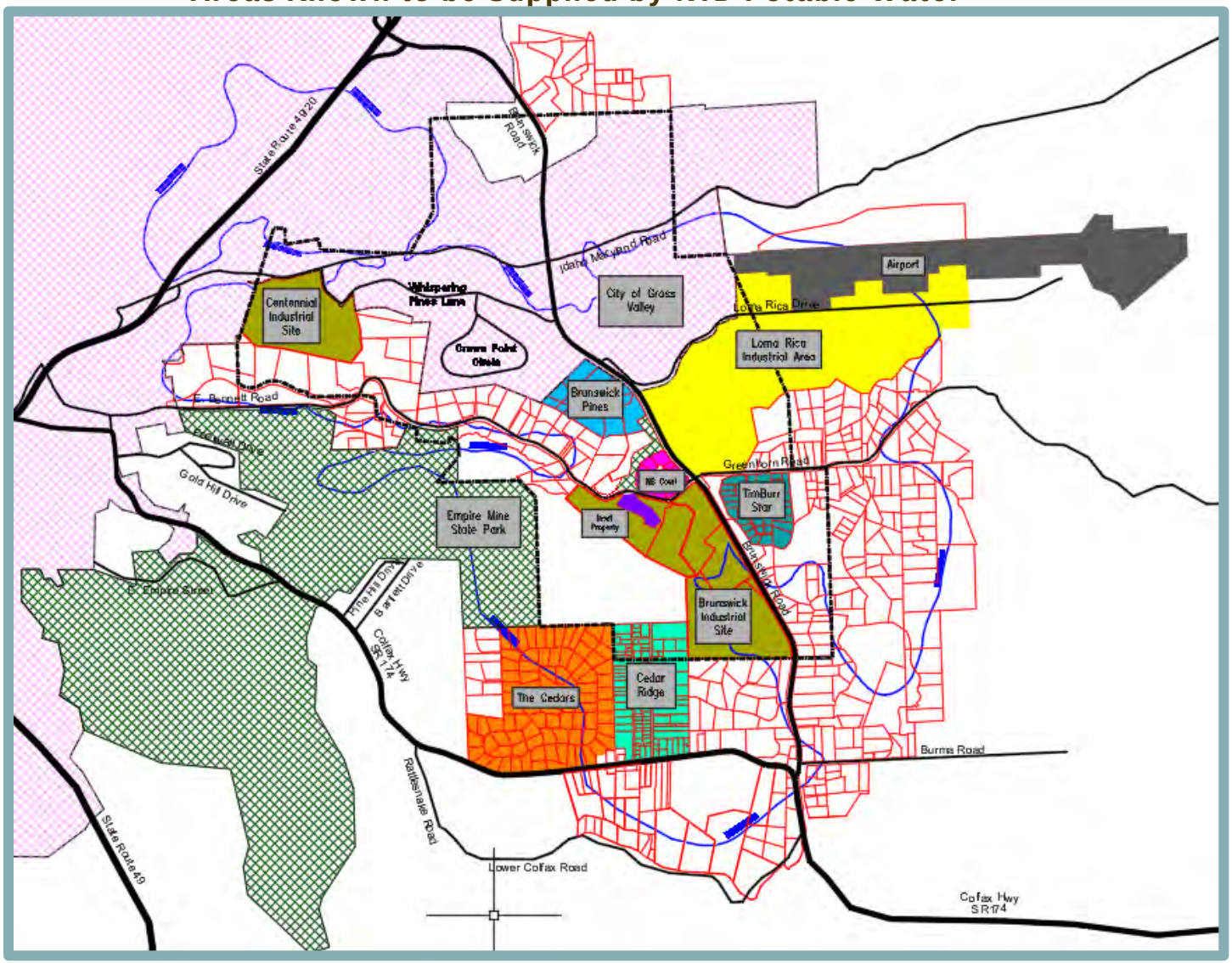


Table 3
Properties Eligible for Domestic Well Monitoring

APN	Site Address
006-391-005	12803 MCBOYLE WAY
006-391-006	13935 DOWNWIND COURT
006-391-007	13993 DOWNWIND COURT
006-391-008	14020 DOWNWIND COURT
006-391-009	13936 DOWNWIND COURT
006-391-012	12966 GREENHORN ROAD
006-391-013	12990 GREENHORN ROAD
006-391-014	13010 GREENHORN ROAD
006-391-015	13034 GREENHORN ROAD
006-391-016	13058 GREENHORN ROAD
006-391-022	12920 GREENHORN ROAD
006-391-023	12890 GREENHORN ROAD
006-391-025	13072 GREENHORN ROAD
006-391-032	12894 GREENHORN ROAD
006-391-033	12900 GREENHORN ROAD
006-441-008	13352 LOWER ANCHOR LANE
006-441-009	14149 CHRISTOPHER ROBIN WAY
006-441-010	13289 LOWER ANCHOR LANE
006-441-011	14095 CHRISTOPHER ROBIN WAY
006-441-012	14107 CHRISTOPHER ROBIN WAY
006-441-013	14027 CHRISTOPHER ROBIN WAY
006-441-014	13186 OMEGA COURT
006-441-015	13173 OMEGA COURT
006-441-016	13883 CHRISTOPHER ROBIN WAY
006-441-017	13831 CHRISTOPHER ROBIN WAY
006-441-018	13793 CHRISTOPHER ROBIN WAY
006-441-020	12748 THE HOLLOW
006-441-021	13224 OMEGA COURT
006-441-022	13217 OMEGA COURT
006-441-023	13907 CHRISTOPHER ROBIN WAY
006-441-033	12440 THE HOLLOW
006-461-038	13420 WOOD ROSE WAY
006-461-040	10996 SUNDOWN PLACE
006-461-041	11026 SUNDOWN PLACE
006-461-042	11030 SUNDOWN PLACE
006-461-043	11102 SUNDOWN PLACE
006-461-047	11202 SUNDOWN PLACE

006-471-001	12904 BRUNSWICK ROAD
006-471-003	12942 BRUNSWICK ROAD
006-471-004	12972 BRUNSWICK ROAD
006-471-005	15033 TOWLE LANE
006-471-006	12628 TOWLE COURT
006-471-007	12635 TOWLE COURT
006-471-008	12629 TOWLE COURT
006-471-009	13018 BRUNSWICK ROAD
006-471-010	13064 BRUNSWICK ROAD
006-471-011	11026 BEAUVIEW ROAD
006-471-012	14911 TOWLE LANE
006-471-013	12606 TOWLE COURT
006-481-001	13110 BRUNSWICK ROAD
006-481-002	13148 BRUNSWICK ROAD
006-481-003	13152 BRUNSWICK ROAD
006-481-004	13192 BRUNSWICK ROAD
006-481-005	12524 BURMA ROAD
006-481-006	12552 BURMA ROAD
006-481-007	12590 BURMA ROAD
006-481-008	12666 BURMA ROAD
006-481-009	11316 BEAUVIEW ROAD
006-481-010	11306 BEAUVIEW ROAD
006-481-011	11246 BEAUVIEW ROAD
006-481-012	11124 BEAUVIEW ROAD
006-481-013	11147 BEAUVIEW ROAD
006-481-014	11311 BEAUVIEW ROAD
006-481-015	11321 BEAUVIEW ROAD
006-481-016	12728 BURMA ROAD
006-481-017	12764 BURMA ROAD
006-481-018	12832 BURMA OAKS ROAD
006-481-019	12856 BURMA OAKS ROAD
006-481-020	12886 BURMA OAKS ROAD
006-481-021	13207 BURMA OAKS ROAD
006-700-040	14285 HOLLYDALE ROAD
006-700-071	12604 BRUNSWICK ROAD
006-700-072	12608 BRUNSWICK ROAD
006-720-033	12967 GREENHORN ROAD
006-720-034	13009 GREENHORN ROAD
006-720-035	13023 GREENHORN ROAD
006-720-036	13049 GREENHORN ROAD

006-720-037	13015 GREENHORN ROAD
006-720-038	14240 HOLLYDALE ROAD
006-720-039	14254 HOLLYDALE ROAD
006-720-040	13030 HOLLY BRANCH COURT
006-720-041	13025 HOLLY BRANCH COURT
006-720-042	13033 HOLLY BRANCH COURT
006-720-043	14278 HOLLYDALE ROAD
006-790-001	13103 GREENHORN ROAD
006-790-002	14277 HOLLYDALE ROAD
006-790-003	13139 GREENHORN ROAD
006-790-005	13140 LOWER ANCHOR LANE
006-790-008	14440 ANCHOR LANE
006-790-017	14458 ANCHOR LANE
006-790-020	14384 ANCHOR LANE
006-790-021	14232 ANCHOR LANE
006-790-022	13203 GREENHORN ROAD
006-790-023	14327 LITTLE HILL LANE
006-790-025	14592 LITTLE HILL LANE
006-790-026	14551 LITTLE HILL LANE
006-790-027	14554 LITTLE HILL LANE
006-790-030	14471 ANCHOR LANE
006-790-032	14325 ANCHOR LANE
006-790-034	14550 ANCHOR LANE
006-790-036	14395 LITTLE HILL LANE
006-790-037	14451 LITTLE HILL LANE
006-790-038	14581 ANCHOR LANE
006-790-039	14619 ANCHOR LANE
006-790-040	14528 LITTLE HILL LANE
006-790-041	14478 LITTLE HILL LANE
006-790-042	14349 ANCHOR LANE
006-790-043	14367 ANCHOR LANE
006-790-045	14346 ANCHOR LANE
006-790-046	13193 LOWER ANCHOR LANE
006-790-047	13231 LOWER ANCHOR LANE
006-790-048	14285 ANCHOR LANE
006-790-050	14330 ANCHOR LANE
006-790-051	14418 ANCHOR LANE
006-790-053	14482 ANCHOR LANE
006-800-001	12616 BRUNSWICK ROAD
006-800-002	12684 BRUNSWICK ROAD

006-800-003	12730 BRUNSWICK ROAD
006-800-005	14744 TOWLE LANE
006-800-006	14794 TOWLE LANE
006-800-007	14793 TOWLE LANE
006-800-008	14749 TOWLE LANE
006-800-009	14719 TOWLE LANE
006-800-010	14689 TOWLE LANE
006-800-011	12980 WOOD ROSE WAY
006-800-016	13183 WOOD ROSE WAY
006-800-017	13320 WOOD ROSE WAY
006-800-018	13326 WOOD ROSE WAY
006-800-022	12768 BRUNSWICK ROAD
006-800-023	14712 TOWLE LANE
006-800-024	12999 WOOD ROSE WAY
006-800-026	13041 WOOD ROSE WAY
006-800-027	13052 WOOD ROSE WAY
006-800-028	13034 WOOD ROSE WAY
006-800-029	13018 WOOD ROSE WAY
006-800-030	13120 WOOD ROSE WAY
006-800-031	13129 WOOD ROSE WAY
006-800-032	13171 WOOD ROSE WAY
006-800-033	13259 WOOD ROSE WAY
006-800-034	10830 LANTANA LANE
006-800-035	10856 LANTANA LANE
006-820-004	14093 GLENN PINES ROAD
006-820-005	14138 GLENN PINES ROAD
006-820-006	13399 NEVADA CITY AVENUE
006-820-007	13966 LIQUIDAMBAR LANE
006-820-008	14006 LIQUIDAMBAR LANE
006-820-009	14054 LIQUIDAMBAR LANE
006-820-010	14096 LIQUIDAMBAR LANE
006-820-011	14130 LIQUIDAMBAR LANE
006-820-012	14168 LIQUIDAMBAR LANE
006-820-013	13198 GREENHORN ROAD
006-820-014	14137 LIQUIDAMBAR LANE
006-820-015	14107 LIQUIDAMBAR LANE
006-820-016	14087 LIQUIDAMBAR LANE
006-820-017	14119 LIQUIDAMBAR LANE
006-820-019	14076 GLENN PINES ROAD
006-820-020	14046 GLENN PINES ROAD

006-820-022	13935 GLENN PINES ROAD
006-820-023	13448 GREENHORN ROAD
006-820-024	13530 GREENHORN ROAD
006-820-029	13549 GREENHORN ROAD
006-820-030	13505 GREENHORN ROAD
006-820-034	13413 GREENHORN ROAD
006-820-035	13315 GREENHORN ROAD
006-820-036	13226 GREENHORN ROAD
006-820-037	13227 GREENHORN ROAD
006-820-039	13203 GREENHORN ROAD
006-820-042	13974 GLENN PINES ROAD
006-820-043	13955 GLENN PINES ROAD
006-820-045	14108 YAMA WAY
006-820-046	12681 LEAF LANE
006-820-047	12719 LEAF LANE
006-820-048	12757 LEAF LANE
006-820-049	12975 LEAF LANE
006-820-052	14065 GLENN PINES ROAD
006-820-053	14023 GLENN PINES ROAD
006-820-056	13564 GREENHORN ROAD
006-820-057	13949 LIQUIDAMBAR LANE
006-820-059	14027 LIQUIDAMBAR LANE
006-830-068	12469 THE HOLLOW
006-890-001	12933 ELK LANE
006-890-002	12955 ELK LANE
006-890-003	12966 MINK COURT
006-890-004	12940 MINK COURT
006-890-005	12951 MINK COURT
006-890-006	12702 BEAVER DRIVE
006-890-007	12372 BEAVER DRIVE
006-890-008	12436 BEAVER DRIVE
006-890-009	13010 MINK COURT
006-890-010	12975 MINK COURT
006-890-011	12540 BEAVER DRIVE
006-890-012	12640 BEAVER DRIVE
006-890-013	12353 BEAVER DRIVE
006-890-014	12405 BEAVER DRIVE
006-890-015	12467 BEAVER DRIVE
006-890-016	12545 BEAVER DRIVE
006-890-017	12645 BEAVER DRIVE

006-890-018	12998 STATE HIGHWAY 174
006-890-019	13024 STATE HIGHWAY 174
006-890-020	13064 STATE HIGHWAY 174
006-890-021	13136 STATE HIGHWAY 174
006-890-022	13194 STATE HIGHWAY 174
006-890-023	13177 BRUNSWICK ROAD
006-890-024	13215 BRUNSWICK ROAD
006-890-025	13253 BRUNSWICK ROAD
006-890-026	13270 STATE HIGHWAY 174
006-920-013	13634 VINCENT COURT
006-920-014	13636 VINCENT COURT
009-320-001	11431 EAST BENNETT ROAD
009-320-003	11889 SLOW POKE LANE
009-320-012	11497 EAST BENNETT ROAD
009-320-013	11343 LAVA ROCK AVENUE
009-320-024	11273 LAVA ROCK AVENUE
009-320-025	11773 SLOW POKE LANE
009-320-027	11565 EAST BENNETT ROAD
009-320-028	11613 EAST BENNETT ROAD
009-320-029	11527 EAST BENNETT ROAD
009-320-030	10423 EAST BENNETT ROAD
009-320-031	11337 EAST BENNETT ROAD
009-320-032	11317 EAST BENNETT ROAD
009-320-033	11269 EAST BENNETT ROAD
009-320-035	11752 EAST BENNETT ROAD
009-560-004	10662 EAST BENNETT ROAD
009-560-005	10780 EAST BENNETT ROAD
009-560-010	10966 EAST BENNETT ROAD
009-560-013	11612 EAST BENNETT ROAD
009-560-014	11542 EAST BENNETT ROAD
009-560-016	11452 EAST BENNETT ROAD
009-560-018	N/A
009-560-019	N/A
009-560-029	N/A
009-560-030	N/A
009-560-032	N/A
009-560-033	N/A
009-560-034	N/A
009-560-035	N/A
009-560-037	N/A

009-560-038	N/A
009-560-039	N/A
009-560-045	11454 EAST BENNETT ROAD
009-560-046	11336 EAST BENNETT ROAD
009-560-047	11352 EAST BENNETT ROAD
009-581-016	12477 OLD MINE ROAD
009-581-017	12401 OLD MINE ROAD
009-581-045	12504 OLD MINE ROAD
009-581-053	12448 OLD MINE ROAD
009-590-005	11918 EAST BENNETT ROAD
009-590-006	11882 AMETHYST COURT
009-590-007	12047 AMETHYST COURT
009-590-008	11866 EAST BENNETT ROAD
009-590-009	12052 CORDELL COURT
009-590-010	12034 CORDELL COURT
009-590-011	12051 CORDELL COURT
009-590-012	11780 EAST BENNETT ROAD
009-590-013	11828 EAST BENNETT ROAD
009-590-014	11818 EAST BENNETT ROAD
009-600-004	12108 EAST BENNETT ROAD
009-600-008	11966 EAST BENNETT ROAD
009-600-009	12002 EAST BENNETT ROAD
009-600-010	12176 EAST BENNETT ROAD
009-600-011	12228 EAST BENNETT ROAD
009-600-012	14070 DIAMOND COURT
009-600-013	14036 DIAMOND COURT
009-600-014	14035 DIAMOND COURT
009-600-015	14069 DIAMOND COURT
009-600-016	13997 EMERALD COURT
009-600-017	12040 EAST BENNETT ROAD
009-600-018	11948 EAST BENNETT ROAD
009-600-019	11948 EAST BENNETT ROAD
009-600-024	11753 EAST BENNETT ROAD
009-600-026	12093 EAST BENNETT ROAD
009-600-027	12161 EAST BENNETT ROAD
009-600-028	12261 EAST BENNETT ROAD
009-600-029	12261 EAST BENNETT ROAD
009-600-030	12195 EAST BENNETT ROAD
009-600-031	12233 EAST BENNETT ROAD
009-600-032	N/A

009-600-033	11903 EAST BENNETT ROAD
009-630-008	10879 BARTLETT DRIVE
009-630-040	N/A
009-640-001	12716 FOSTER ROAD
009-640-002	12782 FOSTER ROAD
009-640-003	12764 FOSTER ROAD
009-640-005	12802 FOSTER ROAD
009-640-006	12866 FOSTER ROAD
009-640-007	12852 FOSTER ROAD
009-640-008	12870 FOSTER ROAD
009-640-009	12904 FOSTER ROAD
009-640-010	12960 FOSTER ROAD
009-640-019	11690 STATE HIGHWAY 174
009-640-020	11782 STATE HIGHWAY 174
009-640-028	11744 STATE HIGHWAY 174
009-680-051	N/A
009-680-052	N/A
012-010-004	11922 LOWER COLFAX ROAD
012-010-032	13460 NOEL LANE
012-010-034	11946 LOWER COLFAX ROAD
012-010-035	11938 LOWER COLFAX ROAD
012-010-036	13376 NOEL LANE
012-010-037	13377 NOEL LANE
012-010-038	13434 NOEL LANE
012-010-039	13435 NOEL LANE
012-010-042	13189 NOEL LANE
012-010-047	11900 LOWER COLFAX ROAD
012-010-048	11910 LOWER COLFAX ROAD
012-010-057	13196 NOEL LANE
012-010-059	13299 NOEL LANE
012-010-060	13071 STATE HIGHWAY 174
012-010-061	12018 LOWER COLFAX ROAD
012-010-062	12114 LOWER COLFAX ROAD
012-010-063	12218 LOWER COLFAX ROAD
012-010-066	12795 STATE HIGHWAY 174
012-010-067	12817 STATE HIGHWAY 174
012-010-068	12851 STATE HIGHWAY 174
012-010-069	12873 STATE HIGHWAY 174
012-010-070	12887 STATE HIGHWAY 174
012-010-071	12837 STATE HIGHWAY 174

012-020-003	12535 STATE HIGHWAY 174
012-020-005	12621 STATE HIGHWAY 174
012-020-007	13240 IRISH ACRES CIRCLE
012-020-009	12757 STATE HIGHWAY 174
012-020-010	12779 STATE HIGHWAY 174
012-020-011	13270 IRISH ACRES CIRCLE
012-020-017	11856 LOWER COLFAX ROAD
012-020-018	11810 LOWER COLFAX ROAD
012-020-019	11740 LOWER COLFAX ROAD
012-020-030	12685 STATE HIGHWAY 174
012-020-032	12647 STATE HIGHWAY 174
012-020-036	13350 HOBART LANE
012-020-037	13322 HOBART LANE
012-020-038	13288 HOBART LANE
012-020-041	12719 STATE HIGHWAY 174
012-020-042	12573 STATE HIGHWAY 174
012-020-043	12555 STATE HIGHWAY 174
012-020-044	11718 LOWER COLFAX ROAD
012-020-045	11696 LOWER COLFAX ROAD
012-040-004	12637 BURMA ROAD
012-040-005	12689 BURMA ROAD
012-040-015	13460 STATE HIGHWAY 174
012-040-019	13383 STATE HIGHWAY 174
012-040-020	13345 STATE HIGHWAY 174
012-040-024	12577 CEDAR CREST COURT
012-040-029	12615 CEDAR CREST COURT
012-040-030	12599 CEDAR CREST COURT
012-040-033	13420 STATE HIGHWAY 174
012-040-034	12560 LOS CEDROS LANE
012-040-035	12509 BURMA ROAD
012-040-036	12588 CEDAR CREST COURT
012-040-037	13328 BRUNSWICK ROAD
012-040-038	13458 STATE HIGHWAY 174
012-040-039	12567 LOS CEDROS LANE
012-040-060	13255 BRUNSWICK ROAD
012-040-065	13623 LAWS RANCH CROSS ROAD
012-040-067	13453 STATE HIGHWAY 174
012-040-082	13332 BASS TRAIL
035-430-021	10728 GLENBROOK ESTATES COURT
035-460-004	12125 CRYSTAL SPRINGS ROAD

035-460-017	N/A
035-460-018	12134 CRYSTAL SPRINGS ROAD
035-550-001	10833 BUBBLING WELLS ROAD
035-550-002	10871 BUBBLING WELLS ROAD
035-550-008	10682 BUBBLING WELLS ROAD
035-550-010	10750 BUBBLING WELLS ROAD
035-550-011	10706 BUBBLING WELLS ROAD
035-550-012	10826 BUBBLING WELLS ROAD
035-550-013	12178 BOREHAM MINE ROAD
035-550-014	10794 BUBBLING WELLS ROAD
035-550-016	10651 BUBBLING WELLS ROAD
035-550-017	10923 BUBBLING WELLS ROAD
035-550-018	10938 BUBBLING WELLS ROAD
035-550-019	10985 BUBBLING WELLS ROAD
035-550-020	11000 BUBBLING WELLS ROAD
035-550-021	11052 BUBBLING WELLS ROAD
035-550-022	11068 BUBBLING WELLS ROAD
035-550-023	10730 GLENBROOK ESTATES COURT
035-550-024	10763 BUBBLING WELLS ROAD
035-550-025	10741 BUBBLING WELLS ROAD
035-550-026	UNKNOWN ADDRESS

Conclusion

The DEIR (Mitigation Measure 4.8-2(a)) requires a groundwater monitoring plan that includes installation and monitoring of numerous groundwater monitoring wells to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(b) requires the applicant to be responsible for replacing water for any impacted wells (i.e., a 10 percent or greater reduction of the water column of any well) beyond the expected drawdown impact area, pursuant to Nevada County General Plan Policy 17.12. While the GMP is adequate to ensure early detection of potential well impacts (both quantity and quality), the applicant has agreed to implement a Domestic Well Monitoring Program, that would work in concert with the GMP to ensure early detection of potentially significant well impacts beyond the anticipated drawdown area, such that well mitigation measures can be implemented.

Master Response 16 - Drought and Climate Change

Comments

Several commenters have stated that droughts induced by climate change are not considered in the analysis of the DEIR or that the Project will contribute to the effects of drought on water users.

Discussion

As disclosed in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations that may range from 10 feet to 50 feet between wet

and dry times of the year but remain relatively consistent from year to year within each individual well. During the monitoring period, several years with below normal rainfall occurred (2001, 2004, and 2007), multiple years with above normal rainfall occurred (1995-1998 and 2006), and several years of near-normal rainfall occurred (1999, 2000, 2002, 2003, 2005). Despite large variations in annual rainfall from year to year, the seasonal water level cycles in individual wells remain consistent over time and the overall water levels shown on the hydrographs for each well do not fluctuate based on wet or dry climatic cycles. Based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge, as described in Section 3.2, appears to be consistent from year to year and is not affected substantially by drought or wet cycles. It is noted that no groundwater level measurements have been completed since 2007 which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of 30 properties, including properties where no significant impact is predicted in the E. Bennett area, to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Section 4.8 of DEIR has determined that the Project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements of monitoring wells and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures.

Climate models predict that mean annual temperatures in the western United States will increase 1–2 °C during the first half of this century and the warmer temperatures will likely result in a reduction in mountain snowpack and a winter-ward shift in springtime peak streamflows of about one month by 2050. These effects are reported to have already been observed in the Sierra Nevada. However, current understanding of groundwater recharge and storage in mountain watersheds is insufficient to predict with reasonable confidence the manner and rate at which discharge from mountain aquifers will respond to changes in climate (Earman 2012). Reduced mountain snowpacks could potentially lead to reduced mountain groundwater recharge, even if total precipitation remains nearly the same, due to a potential increase in evapotranspiration associated with warmer temperatures. However, it is also possible that mountain recharge rates will remain unchanged or increase in response to climate change. For example, fractured-rock aquifers underlying mountain watersheds are typically permeability-limited rather than recharge-limited, so a reduction in snowmelt may have little influence on recharge rates (Earman 2012). Further, earlier snowmelt periods may cause more infiltration to occur early in the spring when evapotranspiration rates are low, leading to an increase in recharge. (Earman 2012.) As such, an assumption that climate change will result in reduced recharge and groundwater availability in the Project area is speculative and need not be analyzed in an EIR.

Nonetheless, Itasca performed an analysis of the impacts of changing recharge (to reflect changes in precipitation) on predicted inflows to the mine and the resulting impacts to drawdowns in shallow groundwater. These sensitivity scenarios (Scenarios 4 and 5) are discussed in Section 5.4 of Appendix K.3 of the DEIR. The results are that increasing or decreasing recharge by 50% (a very extreme case, that is beyond what can reasonably be expected) only changes the predicted inflows to the mine by +/- 3% compared to the base case. The small changes in

predicted inflows are due to the low *K*s of the deeper geologic units where the mining will occur. Higher recharge reduces the area of drawdown. If the recharge rate in the model domain is decreased by 50%, the extent of the 5-ft drawdown isopleth is larger than in the Base-Case Scenario, as decreased recharge impacts the shallow water-bearing zones more than the deep zone. The 5-ft drawdown isopleth is generally still within the mineral-rights boundary.

As shown on Figure 5-9 of Appendix K.3, the simulated 5-foot drawdown contour for Scenario 5 is very similar to the other sensitivity scenarios except for an expansion of the 5-ft drawdown to the south-east towards the greenhorn area by approximately 1500 feet. As further discussed on page 8 of Appendix K.3 of the DEIR, the consistent annual recharge may be due to the limitations of recharge in fractured bedrock, where the annual rainfall amount may be greater than the capacity of the fractures to accept additional flow. In this situation, increases or decreases in the annual rainfall due to climatic cycles do not have appreciable effects on the amount of water that can be recharged because the capacity of the fractures to transmit water in the subsurface is near its maximum. Thus, there may not be a substantial variation in recharge to the water-bearing geologic materials in the Project area. Nevertheless, the sensitivity of the model to changes in recharge has been evaluated, and even an extreme scenario of 50% recharge reduction, which is not expected to occur, did not significantly change the analysis.

The future effects of climate change on groundwater recharge are unknown due to the factors discussed above, and CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As the impact of climate change on recharge is speculative, this impact need not be analyzed in an EIR.

However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the Project could result in a significant impact to groundwater supplies. An increase in drawdown caused by the Project due to reduced groundwater recharge combined with the Project dewatering would be detected in the required well monitoring and well mitigation plans. A Groundwater Monitoring Plan (GMP) is required for the Project under Mitigation Measure 4.8-2(a). Ongoing groundwater monitoring would be required, and groundwater-level information shall be obtained from the Project groundwater monitoring wells and collected on a quarterly basis and submitted in report form to Nevada County. Mitigation Measure 4.8-2(b) requires that if it is determined based on the GMP that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified.

Water Balance - Groundwater and Surface Water Interaction

Several commenters assert that the water supply assessment and groundwater analysis in the DEIR is flawed and is based on inaccurate assumptions because it ignores the link between groundwater and surface water. However, the groundwater model and hydrologic analysis discuss in detail the linkage between surface water and groundwater, which is fundamental to the analysis. As shown in Figure 4-5 of Appendix K.3, the regional groundwater flows westerly past the Project site. The analysis determined that the groundwater that inflows into the mine workings originates from the entirety of the approximately 4,000 ft vertical thickness of the rock mass. The groundwater flow from the shallower rock unit to the mine workings could lower the water level of

the shallow groundwater system in the vicinity of the mining zone. However, the groundwater flow from the deeper rock units to the mine workings will not impact the shallow groundwater level. All the inflow to the mine workings will be pumped to surface, treated and discharged into South Fork Wolf Creek where it would then flow to Wolf Creek and then to the Bear River. As predicted in the groundwater flow model, the maximum reduction of the baseflow in Wolf Creek is approximately 0.85 cfs. The Project plans to discharge 1.9 cfs treated water to Wolf Creek. The Project produces water that has a beneficial use at surface (rather than flowing underground) but does not change the overall water balance.

As stated on page 2 of the Water Supply Assessment for the Project (Appendix N), the projected potable and non-potable water demand for building of the proposed project totals approximately 121 acre-feet per year. The Project is expected to be a net producer of water through its discharge of approximately 1,371 acre-feet per year of treated mine water to the South Fork of Wolf Creek. The Nevada Irrigation District (NID) could adjust its flows upstream to use the extra water available downstream if it desired to. As discussed on page 4.8-65 of the DEIR and page 25 of Appendix K.3, the groundwater model indicates that base flows in South Fork Wolf Creek and Wolf Creek would be reduced from mine dewatering by approximately 1 cfs, which is approximately 724 acre-feet per year, not counting the Project's addition of 1,371 acre-feet per year of treated mine water to the South Fork of Wolf Creek. Therefore, the net addition of water available for beneficial use on the surface is approximately 500 acre-feet/year. Portion of this additional water originates from the storage of the deeper rock units that have little hydraulic connection with the shallow groundwater system. As shown in Table 6-5 of Appendix N to the DEIR, a single dry year water supply for NID is estimated at 91,800 acre-feet per year. Although the quantity of water discharged from the proposed mine is small in comparison to the overall amount of NID water supply, the Project would provide additional water to NID customers during times of drought and therefore diversify water supplies available to the community and increase drought resiliency. This additional water would not likely influence measures of the NID Drought Plan (see Section 6.5 of the NID 2020 Urban Water Management Plan). However, it should be noted that stages 1 through 5 of the NID Drought Plan only impose restrictions to outdoor irrigation on treated water customers and stage 6 of the NID Drought plan maintains health and safety use of water for treated water customers. Therefore, properties in the E. Bennett area which are connected to NID water supply under the Project's Well Mitigation Plan (Appendix K.9) would be assured water delivery for necessary use by NID even during the most severe droughts. As discussed in Appendix K.9, property owners may also choose to retain and continue using their water wells in addition to the NID potable water if they desire.

Conclusion

The future effects of climate change on groundwater recharge are unknown due to the factors discussed above, and CEQA does not require the analysis of speculative impacts (Section 15384). As the impact of climate change on recharge is speculative, this impact need not be analyzed in an EIR. Nevertheless, the DEIR includes an analysis of the effects of changing recharge (to reflect changes in precipitation) on predicted inflows to the mine and the resulting impacts to drawdowns in shallow groundwater. The results are that increasing or decreasing recharge by 50% (a very extreme case, that is beyond what can reasonably be expected) only changes the predicted inflows to the mine by +/- 3% compared to the base case. In addition, there is consistent annual recharge which may be due to the limitations of recharge in fractured bedrock, where the annual rainfall amount may be greater than the capacity of the fractures to accept additional flow. In this situation, increases or decreases in the annual rainfall due to climatic cycles do not have appreciable effects on the amount of water that can be recharged because the capacity of the fractures to transmit water in the subsurface is near its maximum. Therefore, while



speculative, climate change is not anticipated to significantly effect groundwater recharge, and the DEIR's groundwater analysis adequately evaluates the project's potential to substantially deplete groundwater supplies (Appendix G, X(b)).

References

Earman (Journal of Hydrology. 2012. *Evolution of Groundwater Age in a Mountain Watershed over a Period of Thirteen Years.* Available at: (PDF) Evolution of groundwater age in a mountain watershed over a period of thirteen years | Sam Earman - Academia.edu

Master Response 17 - Meteorological Data Used in HRA

Comments

Several commenters assert that the Health Risk Assessment (HRA) performed for the project did not use appropriate meteorological data for the Grass Valley Area.[9]

Discussion

The dispersion model in the Health Risk Assessment used the most appropriate data for the analysis. AERMOD requires pre-processed met data, which is only available from specific sites. Dudek analyzed the available data compared to actual data at the closest weather station to the project site and Blue Canyon was most representative. There is no AERMOD pre-processed met data from Grass Valley or the Nevada County Airport.

As stated on page 12 of the Health Risk Assessment (Appendix E.1 of the EIR), the nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away), and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction as shown in Figure 20 below[10]. The Blue Canyon met station has a predominant wind direction from the North-East and South (Figure 21); the Auburn met station from the East (Figure 22); and the Beale met station from the South-East and North-West[11] (Figure 23). Blue Canyon was selected since it is the closest station and is the most representative of the project site.

As stated on page 27 of the Health Risk Assessment (Appendix E.1 of the EIR), the maximally exposed receptor (MER) would be the nearest existing residence to the north of the Brunswick Industrial Site. The predominant wind direction used for dispersion modelling is from the south (see Figure 20 of the Health Risk Assessment). Project emissions from construction activities at the Brunswick Site, shaft, process plant, and truck traffic are generally to the south and in proximity to the MER. (see Figure 3.3 of the DEIR and/or the more detailed map that was also submitted with the Use Permit application)[12]. As such, with the predominant wind direction blowing directly towards the nearest sensitive receptor, the Health Risk Assessment for the project presented a conservative analysis.

Furthermore, Dudek contacted the Northern Sierra Air Quality Management District (NSAQMD) to discuss recommended meteorological stations for the Health Risk Assessment prior to

[9] The results of the HRA are incorporated into Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, to address Appendix G, III(c) regarding whether the project would expose sensitive receptors to substantial pollutant concentrations.

[10] Meteoblue. 2020. Climate Grass Valley. Accessed September 2020. https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/grass-valley_united-states-of-america_5353775.

[11] CARB. 2020. HARP AERMOD Meteorological Files. Accessed September 2020. https://ww2.arb.ca.gov/resources/documents/harp-aermod-meteorological-files.

[12] https://www.nevadacountyca.gov/DocumentCenter/View/30404/Brunswick-Site-Plan---Infrastructure

commencing the analysis; however, the NSAQMD did not provide a recommendation as to the most representative meteorological data for the project site. The NSAQMD reviewed the Health Risk Assessment four times (three times prior to public review of the DEIR, April 20, 2020, February 10, 2021, and June 4, 2021) and did not suggest using different meteorological data for the Health Risk Assessment. The NSAQMD is the air quality authority for the County and the project site and did not object to the use of the Blue Canyon meteorological station as representative of the meteorological conditions at the Project site.

Conclusion

The use of meteorological data from the Blue Canyon area represents the best available processed data for use in the HRA and is adequate for purposes of CEQA.

Master Response 18 - Air Quality Thresholds

Comments

Several commenters have questioned the thresholds utilized in the DEIR to identify potential Project impacts associated with emissions of criteria pollutants and toxic air contaminants.

Discussion

As stated on page 4.3-42 of the DEIR, use of the Northern Sierra Air Quality Management District's (NSAQMD) cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons and a hazard index of >1 for increased non-cancer risk. The Health Risk Assessment ("HRA") prepared for the Project concludes that the health risk to the most sensitive receptor will be below these thresholds. The threshold of significance for exposure to toxic air contaminants is based on an incremental increase in cancer and non-cancer risk associated with a project. As such, the baseline concentration does not factor into this impact determination.

Several commenters have stated that the American Lung Association gives Nevada County an "F" for ozone levels and therefore the threshold for the Project's emissions, as discussed in the DEIR, are not valid. Ozone is a reactive gas formed as a result of a complex chemical reaction between reactive organic gases (ROG) and oxides of Nitrogen (NO_x) in the presence of sunlight. As such, unlike other pollutants, ozone is not released directly into the atmosphere from any sources. The Project's emissions of ROG and NO_x are considered criteria air pollutants. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for criteria air pollutants for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because AAQS are based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. Therefore, the NSAQMD thresholds are the correct thresholds.

Figure 20
Wind Rose from Nevada County Airport Meteorological Station

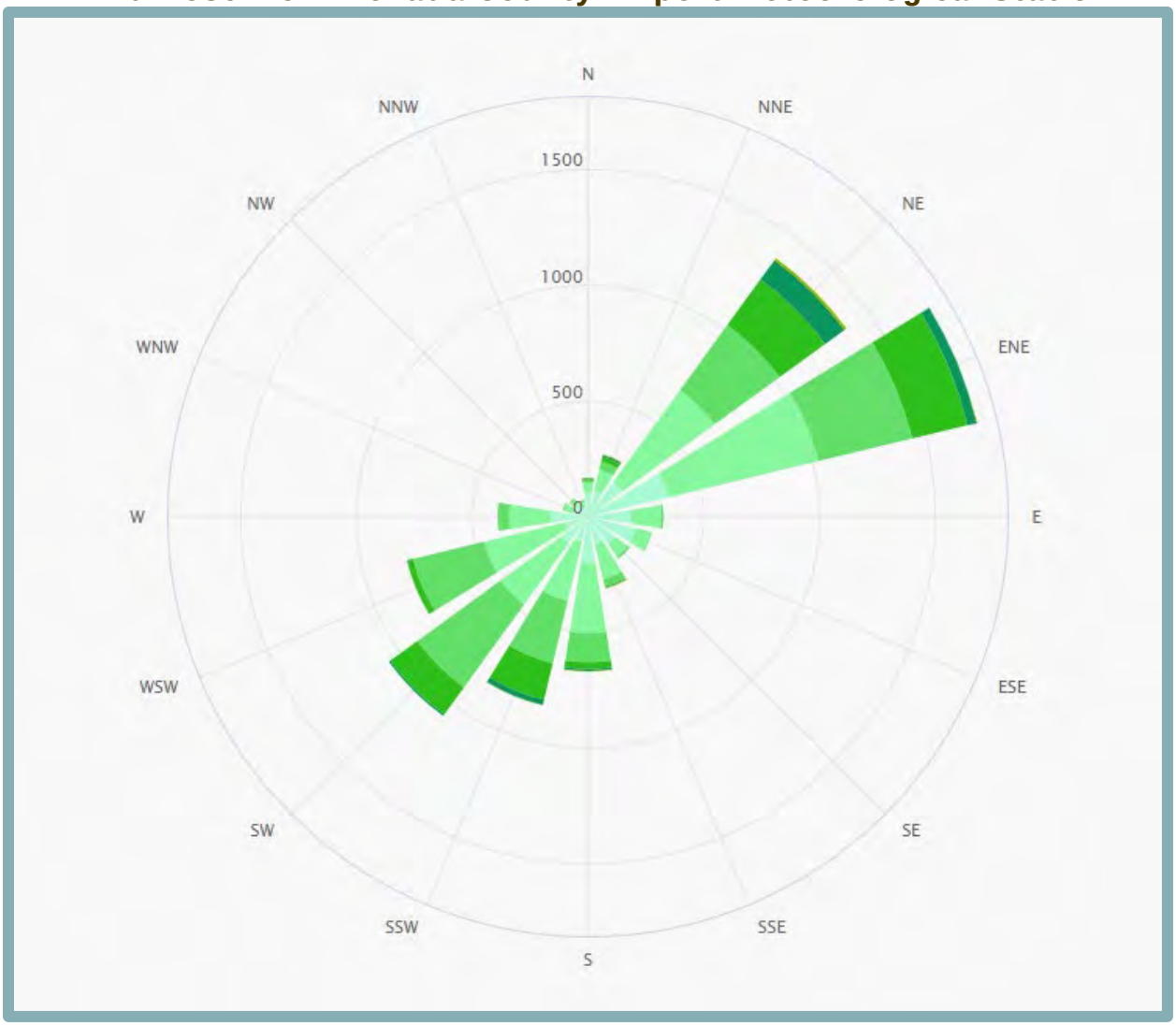


Figure 21
Wind Rose from the Blue Canyon Meteorological Station

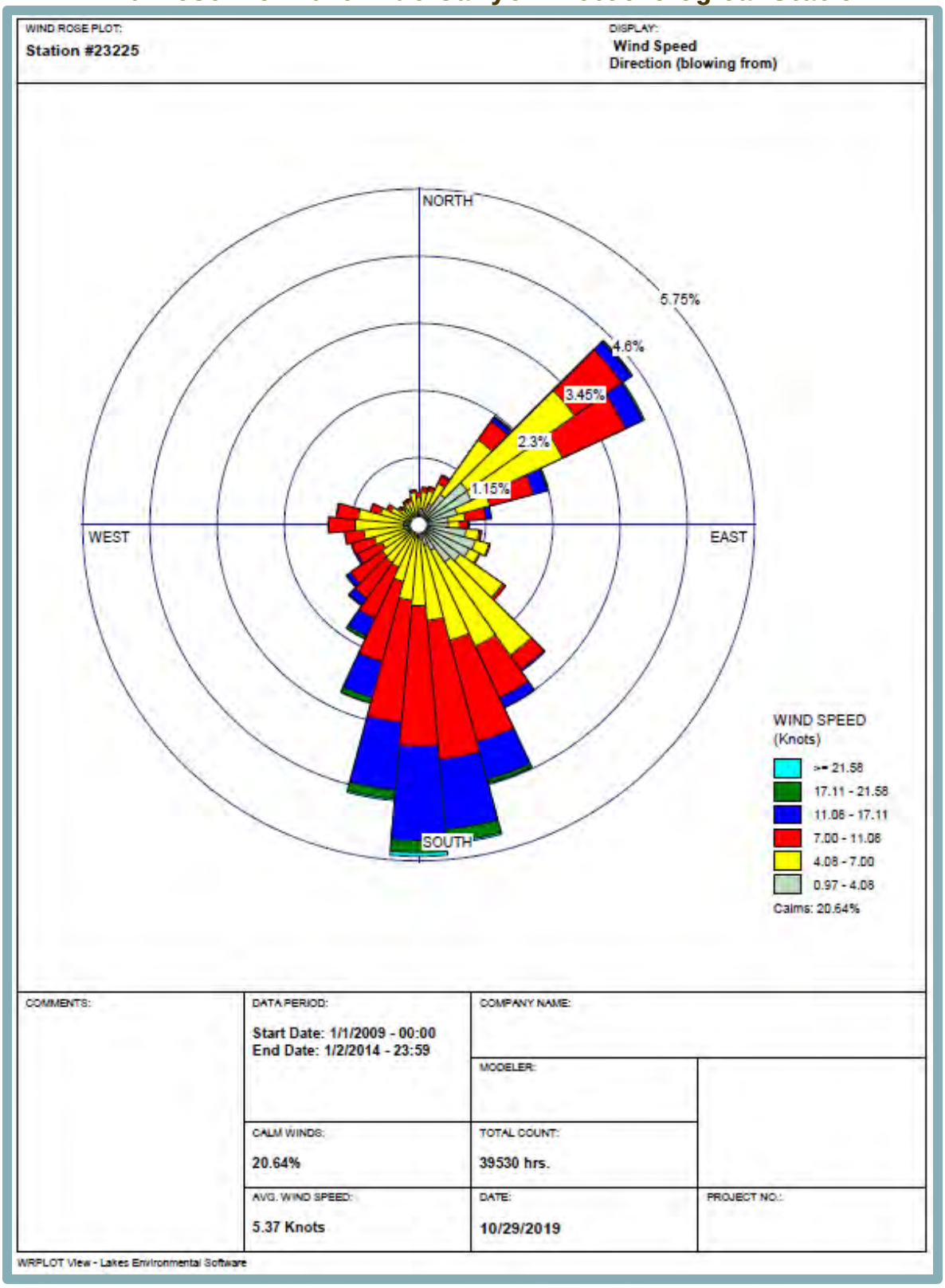


Figure 22
Wind Rose from the Auburn Meteorological Station

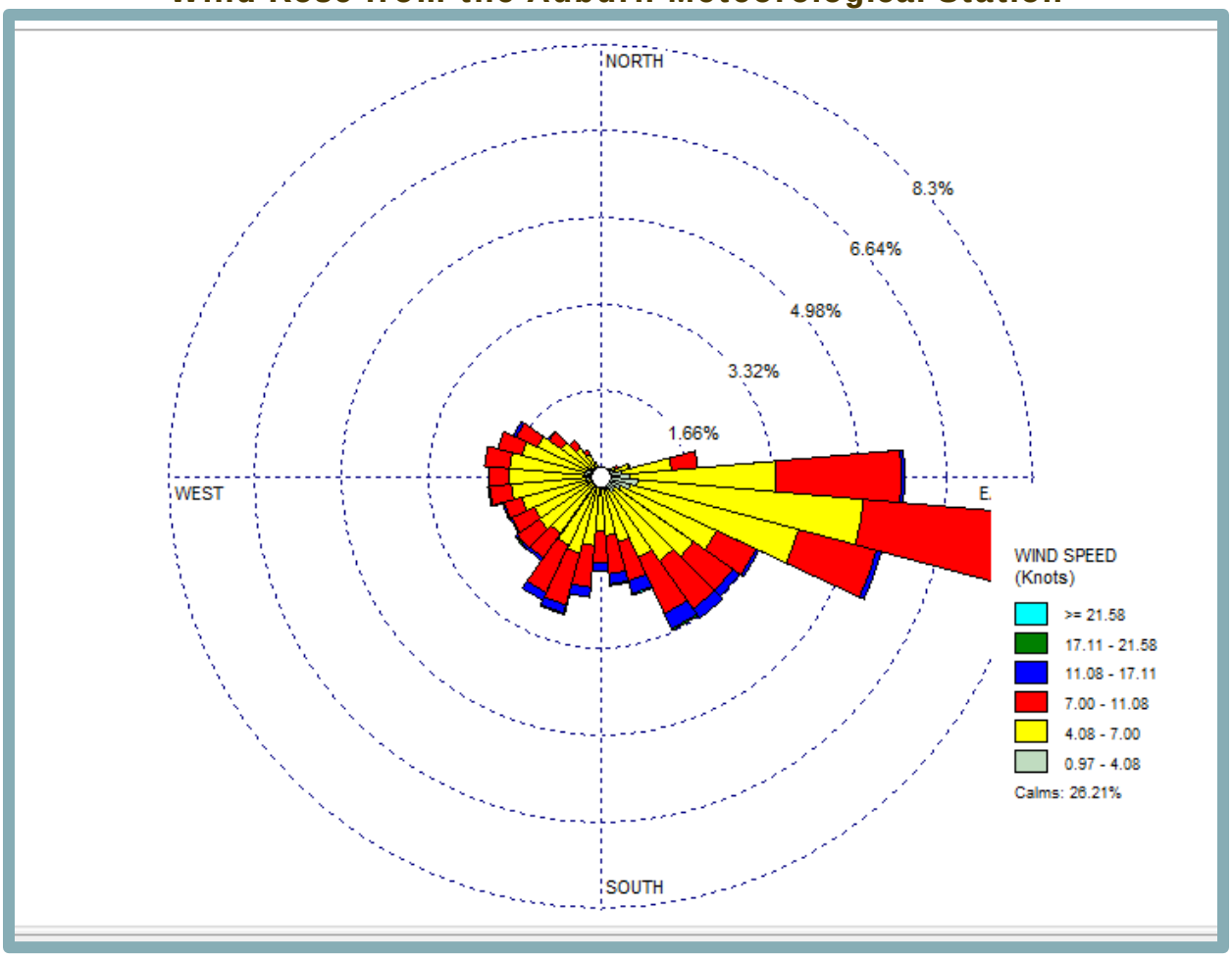
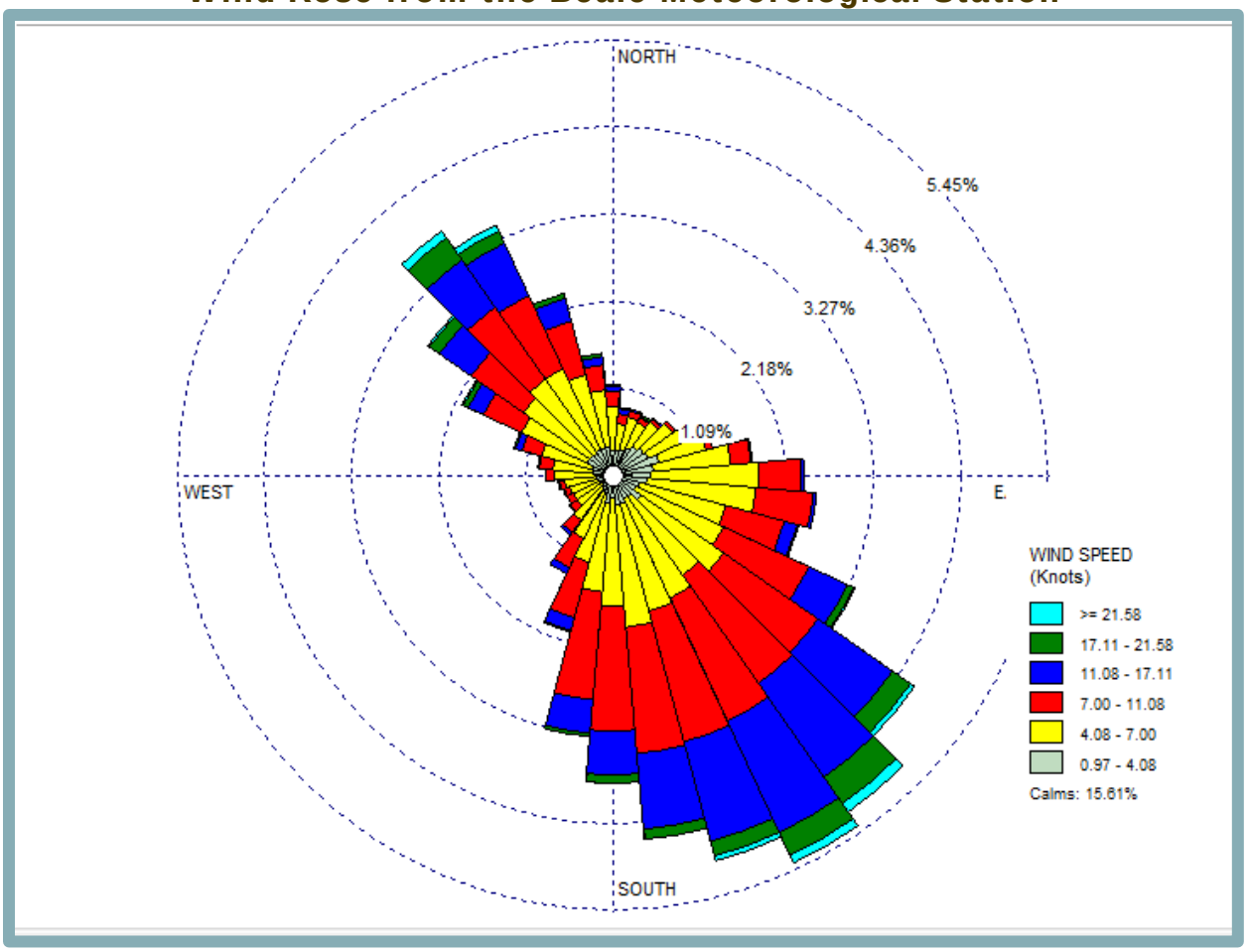


Figure 23
Wind Rose from the Beale Meteorological Station



Several commenters request that the demographics of the community, including age and specific illness rates be considered in the health risk analysis. Health risk assessments do not account for County-specific illness rates. However, as discussed in Section 2.1 of the HRA for the Project, implementing the State OEHHA Guidance, as was done for the Project, reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations. For example, the reference exposure levels (RELs) used in the evaluation of non-cancer risk are designed to protect the most sensitive individuals in the population, including infants and children, by selecting appropriate toxicological data and including margins of safety. Accordingly, the evaluation methods are assumed to protect children and other sensitive subpopulations (groups of more highly susceptible individuals) from adverse health effects in the event of exposure. A similar approach was taken for cancer risk, which accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs), as well as conservative exposure period, fraction of time at home, and cancer potency factors as recommended by OEHHA. Less sensitive receptors, including facilities at a further distance than receptors around the sites, would have less exposure and consequently less potential health risk than the MEIR. Therefore, the HRA used State Mandated Guidance.

The HRA prepared for the Project uses a 30-year exposure timeframe, and several commenters have asked what health impacts will occur after that 30-year period. As stated on page 26 of the HRA (Appendix E.1 of the DEIR), OEHHA describes cancer risk evaluations for 9-, 30-, and 70-year exposure durations in the 2015 OEHHA Guidelines and identifies that the 9- and 30-year durations correspond to the average and high-end of residency time recommended by the EPA, with the 30-year exposure duration recommended for use as the basis for estimating cancer risk at the maximally exposed individual resident in all HRAs. OEHHA recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident (MEIR) in the Hot Spots Program. This exposure duration represents the time of residency for 90 to 95% of Californians at a single location and should provide adequate public health protection against individual risk. (Section 8.1 OEHHA 2015 Air Toxics Hot Spots Program Manual). As standard practice, the duration of exposure is based on 30-year sensitive receptor residency rather than the life of a project.

Conclusion

This master response demonstrates that the thresholds used in the DEIR to identify potential project impacts associated with emissions of criteria pollutants and toxic air contaminants are consistent with the local air district's (NSAQMD) guidance and protective of human health.

Master Response 19 - NSAQMD Criteria Pollutant Thresholds During Operations

Comments

Several commenters asserted that mitigation is not incorporated for criteria air pollutants for the operational phase of the Project.

Discussion

Contrary to the comments, the Project incorporates the mandatory mitigation of criteria pollutants required by the Northern Sierra Air Quality Management District (NSAQMD) in both construction and operations. Moreover, the Project incorporates applicant proposed measures (APMs) that serve to reduce project emissions of criteria air pollutants (DEIR, p. 4.3-65). The APMs will be mandatory conditions of approval and included in the mitigation monitoring and reporting program.

As an example, the project includes the use of Tier4F engines to reduce emissions, which is not a mandatory measure required by NSAQMD. Tier 4F standards require that emissions of PM and NOx be reduced by about 90% versus Tier 1-3 standards[13]. The use of Tier 4F engines reduces the project's emissions of criteria air pollutants and decreases health risk from the project through the reduction of diesel particulate emissions.

As discussed on page 4.3-41 of the DEIR, Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to determine whether the project would have a significant impact on air quality.

The NSAQMD has developed a tiered approach to significance levels. The tiered thresholds for Levels A, B, and C are applicable for a particular project based on that project's estimated emissions of criteria pollutants in pounds per day. A project with emissions qualifying for Level A thresholds (i.e., all projects with emissions greater than zero, but less than level B requires the most basic mitigation. Projects that qualify for Level B require more extensive mitigation, and projects that qualify for Level C require the most extensive application of mitigation.

Mitigation Measure 4.3-1(a) requires the mitigation measures identified in the NSAQMD's *Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects* for significance levels A and B thresholds during project construction. However, these measures are already addressed in the design during operations (Year 2022 and later), as follows:

1) The project would not burn vegetative material. Processing of vegetation before placement of engineered fill would be done by chipping.
2) Grid power is already used to the maximum extent feasible. The entire underground mine and process plant are powered by electricity.
3) No temporary traffic control is needed during operations.
4) The employee work schedule is designed to result in the majority of employee traffic to occur during off-peak hours (268 of 312 employees – see Table 3-8 of the DEIR)

Burning of vegetative material will be prohibited in a condition of approval, which is included in the Mitigation Monitoring and Reporting Program (MMRP) (Chapter 4 of this Final EIR). In addition to the mandatory mitigations required by the NSAQMD, the project proposes to utilize Tier4F engines for offroad equipment.

Utilize Tier 4F Engines

During construction, the off-road equipment used will likely be owned by contractors who may or may not utilize equipment with Tier 4 Final engines. The unmitigated emissions presented in the Air Quality Analysis of the DEIR assumes the use of lower tier equipment. Mitigation Measure 4-3-1(b) requires a Construction Exhaust Emissions Minimization Plan and the use of Tier 4 Final engines or alternative sources of power. The mitigated emissions presented in the Air Quality Analysis of the DEIR reflect the lower emissions that would be achieved by this mitigation measure.

During operations, the off-road surface equipment used will be owned or contracted to the applicant. This equipment is specified to have Tier4F engines (see page 131 of pdf Appendix E.1). All underground equipment will be powered by electricity. Therefore, for the years after construction (2022-2026, 2027-2032, 2033-2102, and 2103) the unmitigated and mitigated emissions presented in the Air Quality Analysis of the DEIR are identical. The use of electric and

[13] https://www.transportpolicy.net/standard/us-nonroad-emissions/

Tier4F engines diesel engines has been incorporated into the design of the project during operations and therefore a mitigation measure for their use during operations is not required in the DEIR.

The NSAQMD recommended mitigation measures are incorporated in the Project design. The applicant has included multiple APMs in order to reduce the level of emissions as part of the project design, which will be conditions of approval for the project, and which are included in the MMRP. Chapter 4 of the FEIR, Mitigation Monitoring and Reporting Program, includes these APMs. These APMs, which go above and beyond the measures suggested in the NSAQMD *Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects* (such as Tier4F surface equipment and all electric equipment underground) were already incorporated into the assessment and, therefore, do not result in additional reductions under the mitigated scenario, nonetheless the APMs do reduce emissions of criteria air pollutants compared to the Project if it did not incorporate these emission reducing features. With these APMs and mitigations applied to the project, criteria air pollutant emissions levels would not be above the NSAQMD threshold level C, and therefore, the project would not result in significant emissions of criteria air pollutants. Notably, the DEIR's application of the NSAQMD CEQA thresholds is consistent with Nevada County's use of these thresholds for other Projects in the County, such as the Lake Wildwood Tennis Facility Lighting Expansion Project, the Auburn Ski Club Project, and the Rincon Del Rio Project, for which use of the mandatory NSAQMD mitigation is deemed to reduce emissions of criteria pollutants (at a NSAQMD A or B threshold level) below a level of significance.[14]

Conclusion

The Project requires the mandatory NSAQMD mitigation but also goes beyond that with the APMs; as such, the DEIR appropriately deems the Project's impact associated with emissions of criteria pollutants as less than significant after implementation of mitigation (DEIR, p. 4.3-73).

Master Response 20 - Conservatism of Metals Assumptions

Comments

The County received several comments asserting that the Health Risk Assessment (HRA) underestimated health impacts from metal content in fugitive dust. Consequently, these commenters requested that the HRA be revised.

Discussion

The HRA (included in Appendix B of Appendix E.1 of the DEIR) considered the metal content of fugitive dust emitted by the project activities in determining the potential health risk of the project. Arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium have approved risk assessment health values for use in the Assembly Bill (AB) 2588 Air Toxics "Hot Spots" Program and the health risk from these metals are therefore included in the HRA for the project. Arsenic, beryllium, cadmium, lead, and nickel have cancer potency factors, while copper, manganese, mercury, vanadium, and selenium have acute and/or chronic relative exposure levels (RELs).

The HRA for the project assumes metal proportions for mined materials from exploration sampling presented in Section X of the Hydrology Report (Appendix K.2 of the DEIR) in order to analyze

[14] https://www.nevadacountyca.gov/DocumentCenter/View/44636/Lake-Wildwood-Tennis-Facility-Lights-Notice-of-Availability-and-Initial-Study-PLN22-0008-AAP22-0001-VAR22-0004-EIS22-0008-, pp. 14-15; https://www.nevadacountyca.gov/DocumentCenter/View/44519/Auburn-Ski-Club-Notice-of-Availability-and-Initial-Study-PLN22-0092-AAP22-0002-EIS22-0007-VAR22-0003, pp. 16-18; https://www.nevadacountyca.gov/DocumentCenter/View/12692/33-Air-Quality-Draft-PDF, p. 3.3-20-23.

the health risk from fugitive dust. These specific assumptions are provided in Appendix B of Appendix E.1. For conservatism, the metal values of the altered meta-andesite sample, which had the highest toxic metal content of any mineral type sampled from the project site, were used to represent the metal content of all barren and mineralized rock in the underground mine. This sample has significantly increased arsenic (35 parts per million [ppm]) and lead (23 ppm) versus the barren rock composited samples with 3 ppm arsenic and 3 ppm lead, and to a lesser extent, increased cadmium (0.35 ppm versus 0.34 ppm). As a consequence, the HRA conservatively assumes that all materials, including the 500 tons per day of barren rock mined (which generally has much lower metal content), have the same metal content as the meta-andesite sample for purposes modeling dust emissions from the underground mine. This approach overstates the metal content of the average rock mined at the project site to provide a conservative analysis of impacts.

The same approach was taken for the mineral process plant where all rock and sand tailings were assigned with the higher mineralized metal values from the meta-andesite sample rather than the values of the unmineralized barren rock and sand tailings (sulphide minerals containing metals will have been removed from sand tailings). Engineered Fill is composed of 50 percent barren rock and 50 percent sand tailings. The metal values for these materials were averaged and then doubled to include conservatism for dust emissions from the placement and compaction of engineered fill. Dust emissions from the moving of soil were also assigned the same values.

The HRA for the project also makes the conservative assumption that all metals are 100 percent bioavailable. Cancer potency factors are based on metallic metals; however, the metals in rock dust are in mineral forms such pyrite (FeS_2), arsenopyrite (FeAsS) and galena (PbS), which do not have 100 percent bioavailability. The California Department of Toxics Substances Control (DTSC) has conducted research into the bioavailability of arsenic in historic Empire Gold Mine materials and concluded that using the customary default of 100 percent relative bioavailability leads to an overestimation of risk. The bioavailability ranged depending on the sample and method of determination with mean bioavailability ranging up to 15.9 percent. (DTSC 2015 p. 8, Table 2).

Conclusion

Given that the overall metal content in the rock to be mined at the project site is based on the high-metal-content altered meta-andesite sample and is therefore likely overstated, and that the assumed 100 percent bioavailability of the metals is also a likely exaggerated, the HRA provides a conservative analysis of health impacts from metal content in fugitive dust. As such, the commenters' requested revision to the Health Risk assessment is not required, because the DEIR adequately analyzed the impacts and properly relied on conservative assumptions.

References

DTSC (Department of Toxic Substances Control). 2015. *Final Technical Report Arsenic Characterization/Bioavailability on Mine-Scarred Lands.* Available at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2017/06/Arsenic_Study-2.pdf

Master Response 21 - Conservatism of Silica Assumptions

Comments

Several commenters raised concerns regarding health risks associated with silica exposure, asserted that the Health Risk Assessment (HRA) underestimated health risk from silica exposure, and requested additional sampling of rock for silica content and revision to the HRA.

Discussion

As explained below, the HRA used numerous conservative assumptions at every stage in the analysis, which together tend to overstate rather than underestimate the likely health impacts from silica exposure. Therefore, the DEIR properly analyzed health impacts from silica exposure and concluded that health risks as a result of the project would be less than significant after implementation of mitigation (DEIR, p. 4.3-82).

The Office of Environmental Health Hazard Assessment (OEHHA) adopted a chronic Reference Exposure Level (REL) for silica (crystalline, respirable) on February 10th 2005. (see https://oehha.ca.gov/air/document/adoption-chronic-reference-exposure-levels-silica-crystalline-respirable .) A chronic REL is an airborne level of a chemical at or below which no adverse health effects are anticipated in individuals indefinitely exposed to that level. (Id.) The chronic REL for silica is 3 micrograms per cubic meter ($\mu g/m^3$). (OEHHA Chronic Toxicity Summary, Silica, p. 1.) No acute REL has been established for crystalline silica. (Id.)

The REL for silica is meant to be applied only to particles of crystalline silica (quartz, cristobalite, tridymite) of respirable size which has a 50 percent cut-point at 4 micrometer (um) particle aerodynamic diameter. This occupational definition of "respirable" differs from the environmental definition of "respirable," which is known as PM_{10} (particles of 10-micron diameter or less) (OEHHA Chronic Toxicity Summary, Silica, p. 1).

The emission of dust from the project was modeled in the HRA (included in Appendix B of Appendix E.1 of the DEIR) as $PM_{10,}$ and the health risk analysis used a conservative assumption that 60 percent of PM_{10} is respirable crystalline silica for the purpose of quantifying silica exposure to receptors. This is useful as a screening method because if the silica concentration in PM_{10} modeled at a receptor is less than the REL (3 $\mu g/m^3$), respirable silica (50 percent cut-point at 4 micrometer (um) particle aerodynamic diameter) will also be less than 3 $\mu g/m^3$, so a project would not pose a risk due to silica at that receptor. However, the use of PM_{10} overestimates the relevant exposure in any situation, as it includes silica particles that would not be considered "respirable" under the OEHHA definition. (OEHHA Chronic Toxicity Summary, Silica, p. 37)

As stated above, the HRA for the project assumes a generalized 60 percent silica content for all dust, and assumes all this silica is crystalline quartz, to calculate exposure of receptors to silica, which is a conservative assumption. Quartz (crystalline silica) is composed of silica (SiO_2). Silica is also found in the amorphous (non-crystalline) state. The majority of barren rock that will be mined by the proposed project is metamorphosed andesite (meta-andesite). Andesite contains less than 20 percent quartz and averages approximately 6 percent quartz (Mindat.org n.d.). Quartz can be a product of metamorphism due to crystallization from silica bearing fluids (IARC 1997 p. 60). The presence of quartz phenocryst in the meta-andesite "porphyrite" of the Brunswick area is reported by the United States Geological Survey (USGS) (W.D. Johnston Jr 1940 p. 10). Gold is hosted in discrete veins and in stockworks consisting primarily of massive to banded, sheared, and brecciated milky white quartz plus or minus carbonate. The historic veins mined in the Idaho systems averaged from 3 feet to 5 feet. Veins in the Brunswick mine generally ranged from inches to 7 feet or developed in stockwork zones of quartz stringers (AMEC 2017 Section 7.4). Gold mineralization which is mined therefore is not composed entirely of quartz but includes other minerals. Gold mineralization is also diluted during mining by the rock surrounding the veins as full recovery of the vein is desired and mining width requires mine excavations to be of a minimum width. The minimum mining width is dependent on the mining equipment and method used but would not be less than 6 feet. Therefore, a typical "solid" quartz vein would be diluted by one ton of other minerals for every ton of quartz rock.

The HRA model assumed that mined mineralization contains 80 percent quartz (1,000 tons per day) and barren rock contains 20 percent quartz (500 tons per day), which results in an average quartz content of 60 percent for all mined materials. As explained above, the 60 percent quartz content is higher than what is actually expected. Engineered fill produced by the project would be composed of 500 tons barren rock and 500 tons sand tailings. The above assumptions of quartz content would result in an average quartz content of 50 percent for engineered fill; however, the HRA assumed a higher quartz content of 60 percent.

Further evidence of conservatism in the HRA is provided by dust sampling at active mines by inspectors in the United States from 1988-1992. Mean quartz content of 238 samples in underground gold mines was 9.0 percent and from 334 samples at gold mills was 15.3 percent (IARC 1997 p. 66, Table 12). Accordingly, the assumption of 60 percent quartz content is significantly larger than measured values in producing gold mines and process plants, and likely overstates the actual amount of quartz (and therefore crystalline silica) that will be mined by the project.

Conclusion

Given that the HRA assumes a greater crystalline silica content in the mined rock than is likely or observed in similar mines, and also uses an overinclusive definition of "respirable" silica particle size by counting all silica particles of a diameter of 10 microns or less, the HRA overestimates health impacts from respirable crystalline silica exposure. Accordingly, the commenters' requested additional sampling of materials for crystalline silica content or revision to the HRA is not required. because the DEIR properly analyzed the impacts of silica.

References

AMEC (Amec Foster Wheeler. 2017. *Technical Report on the Idaho-Maryland Mine Project.* Grass Valley, California. Available at: https://www.risegoldcorp.com/uploads/content/I-M_Tech_Report.pdf

OEHHA (Office of Environmental Health Hazard Assessment). 2005. *Chronic Toxicity Summary for Silica (Crystalline, Respirable).* February 2005. Page 37. Available at: https://oehha.ca.gov/media/downloads/air/document/silicacrelfinal.pdf

IARC (WHO International Agency for Research on Cancer). 1997. *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans Volume 68 Silica, some Silicates, Coad Dust, and Para-Aramid Fibrils.* Lyon, France. Available at: https://www.ncbi.nlm.nih.gov/books/NBK410047/

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Master Response 22 - Conservatism of Asbestos Assumptions

Comments

Several commenters asserted that the assumptions used in the Health Risk Assessment (HRA) understated the amount of asbestos that will be found in the rock mined at the project, and likewise the level of respirable asbestos that will be emitted into the air. Conversely, the assumptions used for the HRA were based on conservative assumptions that overstate the amount of asbestos in

the rock and tailings and overstate the amount of asbestos that will become airborne. As such, the HRA provides a conservative analysis of asbestos impacts, and thus, adequately evaluates the potential health effects from asbestos attributable to the proposed project.

Discussion

The HRA for the Project (included in Appendix B of Appendix E.1 of the DEIR) assumes that all rock mined will contain 1.07 transmission electron microscopy (TEM) asbestos structures per nanogram (s/ng) (0.01 percent phase contrast microscopy [PCM] equivalent weight percent). This is a conservative assumption based on the asbestos testing conducted on exploration samples presented in the Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) (Appendix E.2 of the DEIR). The majority of the 500 tons per day of barren rock produced by the Project is expected to be composed of meta-andesite. Exploration sampling shows this lithology averages 0.26 TEM structures per nanogram (Appendix C of the ASUR Plan). The assumed asbestos content for barren rock used in the HRA for the Project is approximately 4 times the sampled values; thus, the HRA analysis already includes a conservative 4x factor overestimation of asbestos content in barren rock.

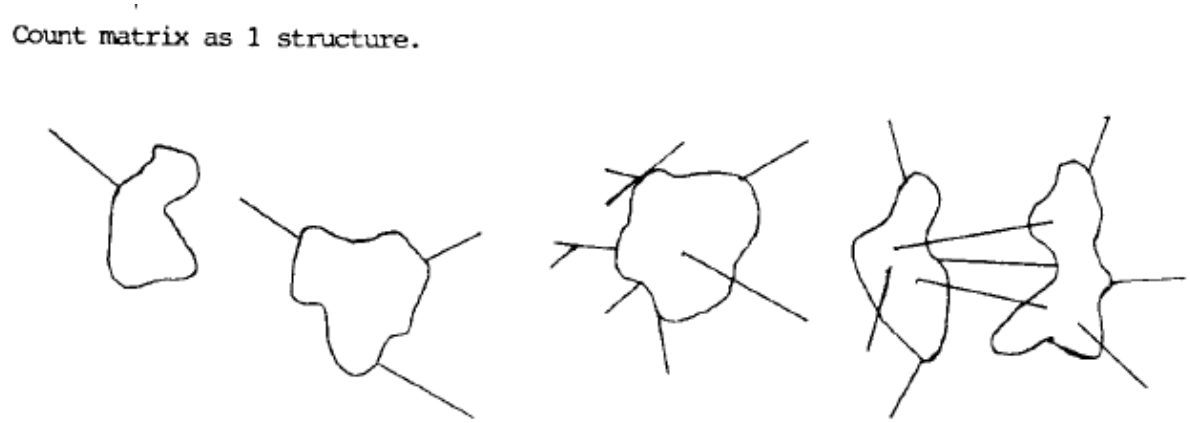
The Project would produce 1,000 tons per day of sand tailings. The applicant submitted two samples of the historical tailings for TEM asbestos testing, which are presented in Appendix C of the ASUR Plan (Appendix E.2 of the DEIR). One sample of historic tailings did not contain any asbestos and one sample contained 0.03 TEM s/ng. In addition, NV5 submitted 10 samples retained from the historical tailings for TEM asbestos testing. Asbestos structures were not present in 7 samples from the western tailings area. Three samples from the eastern tailings area had detectable asbestos ranging from 0.081 s/ng to 0.214 s/ng (see Master Response 9 – Historical Mine Waste at Centennial Site). The average asbestos content of the 10 samples of historic tailings collected by NV5 was 0.049 TEMS asbestos structures per nanogram. The assumed asbestos content for sand tailings used in the HRA for the project (1.07 TEM asbestos structures per nanogram) is over 20 times greater than the average content of the 10 samples taken by NV5 from the historic tailings area on the Centennial Site. As such, the HRA was modeled using asbestos content for the sand tailings that is much higher than is likely to be present during the life of the Project.

Air monitoring requirements will be specified in the approved Asbestos Dust Mitigation Plan (ADMP), which must be approved by the Northern Sierra Air Quality Management District prior to Project operations. The ADMP is required under the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mine Operations. Section (h)(3) of the ATCM specifies the requirement for analysis of air samples. Analysis of all air samples shall follow the analytical method specified by the United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) criteria for asbestos (40 CFR, Part 763 Subpart E, Appendix A, adopted October 30, 1987). The ATCM modifies the AHERA criteria for asbestos and requires a lower detection limit and the counting of all asbestos structures irrespective of length, as per the following exceptions:

A) The analytical sensitivity shall be 0.001 structure per cubic centimeter (0.001 s/cc); and
B) All asbestos structure with an aspect ration greater than three to one (3 to 1) shall be counted irrespective of length.

The ATCM otherwise uses the AHERA criteria for asbestos. AHERA Recording Rules specify that a “matrix” is defined as a structure or structures with one end free and the other end is embedded in or hidden in a particle. A matrix where many asbestos structures are embedded in a dust

particle would be only counted as 1 structure. (see page number 789 on 40 CFR, Part 763 Subpart E, Appendix A)



Under the AHERA Recording Rules, if a fiber does not protrude with an aspect ratio of <3:1 then none of the embedded structures would be counted. (see page number 789 on 40 CFR, Part 763 Subpart E, Appendix A – Note that California uses a 3:1 aspect ratio as discussed above)



Conclusion

The HRA for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM_{10}) is liberated and would be counted as 1 structure in a given airmass. This is a very conservative assumption as a large proportion of asbestos structures in dust particles would not be counted as asbestos in air samples and therefore would not contribute to health risk from asbestos. As such, the HRA provides a conservative analysis of asbestos impacts, and thus, adequately evaluates the potential health effects from asbestos attributable to the proposed project.

Master Response 23 - Adequacy of Sampling - Asbestos

Comments

Several commenters have expressed concerns about the adequacy of asbestos sampling of geological materials conducted for the Idaho-Maryland Mine Project. Many commenters assert that the amount of rock sampled was insufficient for purposes of determining concentration of asbestos and associated risks of exposure.

Discussion

As stated on page 7 of the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan attached to the DEIR, Rise completed 19 exploration drill holes, totalling 67,500 feet of drilling, from 2017 to 2019. Forty-two (42) samples, mainly from diamond drill core from various lithologies at the Idaho-Maryland Mine Project, were submitted for asbestos testing in 2019. PLM testing was done on forty samples and TEM testing was done on two samples. In 2021, Rise requested the 40 samples previously submitted (and analyzed by PLM) to be reanalyzed using the TEM method. Grouping by lithology is important as mining is planned and completed in the distinct geological units present in the mine. For example, serpentine is a lithology of concern due to the presence of chrysotile asbestos.

Several commenters have asserted that the applicant stopped exploration drilling when asbestos was detected. Drilling was stopped when the exploration geologist determined there was little potential for discovery of gold mineralization. Serpentinite is a poor host rock for gold mineralization and holes which encounter it are not continued in this lithology. Continued drilling, and sampling in geological units that have low potential for gold mineralization, would not be representative of the rock that will be encountered during mining operations. Asbestos sampling is not done at the same time as drilling and cannot be detected visually at the low levels present without sophisticated microscopy. Samples from various lithologies at the Idaho-Maryland Mine Project were selected for asbestos testing. The volume and methodology for sampling from the mine area is adequate for the intended purpose of supporting the thresholds and assumptions used in the ASUR Plan and HRA attached to the DEIR (see Master Response 22 – Conservatism Used for Asbestos Assessment). Samples were taken from geological units of the type where gold mining is expected to occur. The sampling methods requested by some commenters with more samples being taken from serpentine rocks and at greater depths than the gold mineralization would be inappropriate for the purpose of estimating asbestos from the planned mining operation, as these samples would not be representative of rock that would be encountered during gold mining activities.

Prior to underground gold mining, intensive planning efforts will be conducted as required under the ASUR Plan and as required to meet state and federal regulations and achieve safety, environmental, and economic goals. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR). Underground mine planning, as required in the ASUR Plan, includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos to ensure that applicable thresholds are not exceeded. In other words, the mandatory mine planning that is required by the DEIR in the ASUR Plan will provide information to the mine operator on asbestos content of rock prior to mining that area. This is a standard component of modern underground mine planning, and was made an explicit requirement of the ASUR Plan, which will be required through a Condition of Approval. As such, the ASUR Plan will be binding on the mine operator and any potential successors in interest to the mine.

Additionally, the HRA is based on conservative assumptions, such that the analysis overestimates health impacts rather than underestimates those impacts. Please see Master Response 22 – Conservatism Used for Asbestos Assessment.

Conclusion

Based on these conservative assumptions, the DEIR concludes that the Project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to



Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in Mitigation Measure 4.3-2. Additional measures, such as air monitoring, if required by the NSAQMD, would be detailed in the ADMP.

Master Response 24 - Project Construction Schedule

Comments

The County received several comments questioning the construction schedule presented in the DEIR. The primary concerns relate to the different construction timelines provided in the air quality (4.3) and project description (3.0) chapters of the DEIR, and the assertion that all phases of construction cannot fit within either timeline. In general, no specific conclusions are drawn from these comments, but rather, the assertion is made that the DEIR analysis would result in different impact conclusions had the construction timeline been more accurate.

Discussion

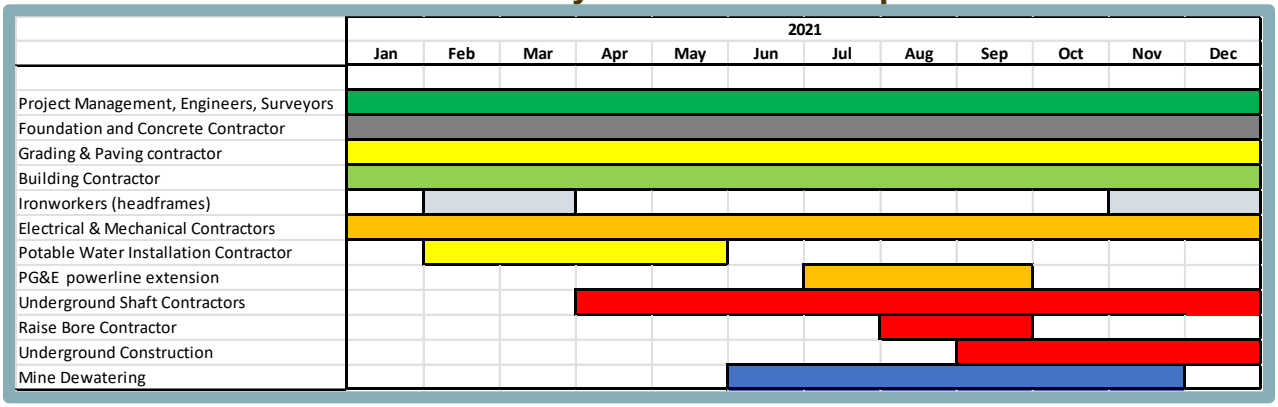
As discussed below, the DEIR assumed an aggressive construction schedule where many activities are overlapping or occurring simultaneously, to provide a conservative assessment of construction noise and air quality impacts. The actual construction schedule may occur as presented in the DEIR, or may be spread out over more time, which would reduce impacts.

Table 3-7 of the DEIR estimates 18 months for aboveground facility construction and 6 months for initial mine dewatering and notes that durations are approximate and dependent on factors such as equipment and personnel availability, fluctuations in the economy, and technical details.

Certain activities must happen sequentially while others may be done in parallel. For example, on page 3-40 of the DEIR, the use of NID supplied water for dust suppression in construction grading is assumed until the mine water treatment plant becomes operational. During this time, the NID potable water line could also be under construction, which is estimated to take four months to complete (page 4.10-27 of the DEIR).

As described on page 4.3-44 of the DEIR, the air quality assessment assumed in general, construction was anticipated to occur over approximately 12 months. The various construction tasks required for the Project and the related equipment emissions were modelled in sequence on a monthly basis as detailed on pages 123 through 127 of Appendix E.1 of the DEIR and shown in Figure 24 below.

Figure 24
Construction schedule assumed in Air Quality and Greenhouse Gas Emissions Analysis Technical Report



The construction scenario assessed in the air quality analysis is the worst-case, because if the same construction activities were to be spread over a longer period (i.e., a period in excess of 12 months), the amount of overlap of equipment usage would be reduced, which would result in reduced maximum daily and annual emissions. Lengthening the construction period would also push out the operational and reclamation phases by the same amount of time. The actual construction period would depend on numerous factors including permitting timelines and economic conditions.

Conclusion

In general, an increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce environmental impacts in many areas, such as air quality and noise due to the reasonably assumed smaller vehicle/equipment fleet that would be required to complete concurrent construction of more than one phase. The conservative approach, which has been taken in the DEIR, is to assume a more aggressive construction timeline. This approach is adequate pursuant to CEQA.

Master Response 25 - Nevada County Energy Action Plan

Comments

Several commenters asserted that the Project is not consistent with the County Energy Action Plan (EAP). As set forth below, the Project furthers some of the strategies outlined in the EAP, and supports the voluntary goals of the EAP, as required by App. G, Section VI(b).

Discussion

As stated on page 4.3-89 of the EIR, Nevada County adopted the EAP in 2019. The EAP includes voluntary actions that are intended to meet the goals of reducing Countywide annual electricity demand by 51 percent and natural gas consumption by 30 percent in the year 2035, relative to a year 2005 baseline. The EAP is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(b); therefore, no subsequent CEQA document can tier from the County EAP and the Project DEIR did not attempt to do so. In addition, the EAP is not a GHG reduction plan and does not provide carbon emissions inventory or strategies for the reduction of GHG emissions in the County other than those associated with the use of utility supplied electricity and natural gas. The reduction of GHG emissions from the reduction of electricity are not quantified in the EAP. The EAP does not consider the use of propane or other fossil fuels, electrification of vehicles, or retrofitting of homes heated by fossil fuels. Once again, the DEIR did not attempt to use the EAP for those purposes. Nevertheless, the compliance of the Project with EAP strategies has been analyzed and the Project found to be consistent with the EAP; therefore, the Project does comply with Section VI(b) of the Appendix G of the CEQA Guidelines because the Project is consistent with the EAP.

The EAP was prepared by the Sierra Business Council and accepted by the Board of Supervisors on February 12, 2019. The EAP provided an analysis of the energy use within the unincorporated County limits by the community and County operated facilities. (see page 1 of the EAP).

The actions within the EAP are voluntary and do not require the County or community to meet the reduction goals. The goal of the plan is to reduce energy use through efficiency, which would save utility customers money, energy, and water (see page 2 of EAP). The EAP sets a goal of reducing electricity use by 51 percent from the Business-as-Usual projection for the year 2035. The majority of savings are attributed to encouraging the installation of renewable energy on existing and new homes and persuading residents to reduce energy use. The potential energy reduction calculations are provided in Appendix C of the EAP and summarized as follows.

	Strategy	Assumption	Projected Electricity Savings (GWhr)
1.1	Outreach and education on energy efficiency practices, programs, and financing options for utility customers.	Projection that 50% of customers will be persuaded to reduce energy use by 30%	51.0
1.2	Improve compliance with current California Building Energy Efficiency Standards (Title 24, part 6) by providing information materials.	100% of new construction meets Title 24 standards	6.5
1.3	Improve energy efficiency of County buildings, facilities, and operations	Reduce energy use in County buildings and public lighting by 50%.	2.6
2.1	Encourage inclusion of renewable energy systems in new construction and large retrofit projects by providing informational materials when available.	100% of new development meet required zero-net-energy standards by 2035	24.0
2.2	Encourage renewable energy projects through education, outreach, and local leadership	7,946 solar participants (56 MW installed power) and 4,099 wind participants (90' Rotor Hub)	112.5
3.1	Improve outreach and education in collaboration with NID by providing information on existing and future programs	100% of households and Businesses reduce indoor water use by 50%	1.6
3.2	Encourage utilities district to reduce water losses through leak detection programs	Reduce water losses by 50%	0.1
3.3	Improve efficiency of County Wastewater Treatment and encourage other agencies to improve efficiency	Reduce energy intensity of wastewater treatment by 30%	0.7
	TOTAL		**199.0**

The new structures proposed by the Project will all meet Title 24 standards in applicable buildings, which is consistent with the EAP. (see DEIR Table 4.3-22.) Further, Project activities would comply with water efficiency Title 24, Part 11 (CALGreen Code) standards in applicable buildings, including installing toilets, urinals, faucets, and showerheads subject to the CALGreen maximum flow rates, which is consistent with the EAP water saving goals. (Id.) While solar panels are not now proposed as part of the Project, the roof space of the Project buildings may be available in the future for installation of solar panels to reduce the Project's reliance on the energy grid. Moreover, the proposed project does not otherwise interfere with the strategies proposed by the EAP or the potential success of the goals of the EAP to reduce energy use by residential and non-residential utility customers by 2035.



Conclusion

The EAP is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(b); therefore, no subsequent CEQA document can tier from the County EAP and the Project DEIR did not attempt to do so. Nevertheless, the compliance of the Project with EAP strategies has been analyzed and the Project found to be consistent with the EAP; therefore, the Project complies with Section VI(b) of the Appendix G of the CEQA Guidelines.

Master Response 26 - Life Cycle GHG Emissions

Comments

Several commenters have suggested that Greenhouse Gas (GHG) emissions associated with the manufacture of materials used by the Project, or the refinement of gold concentrates produced by the Project to gold products, should have been included in the DEIR in order to adequately evaluate the Project's potential GHG impacts. These comments pertain to a "lifecycle" analysis, which is not required under CEQA.

Discussion

As described by the California Natural Resources Agency in the *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97* (2009):

> Moreover, even if a standard definition of the term "lifecycle" existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered "indirect effects" of a project as that term is defined in section 15358 of the State CEQA Guidelines... Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials. (CAPCOA White Paper, at pp. 50-51.) CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be "caused by" the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the manufacturing process. Mitigation can only be required for emissions that are actually caused by the project. (State CEQA Guidelines, § 15126.4(a)(4).)

The Project will use materials including cement, steel, and various products and materials. The manufacture of many of the materials that are used by the proposed project occurs outside of Nevada County boundaries, outside of the local agencies' jurisdictional control or substantial jurisdictional influence. The project GHG emissions estimate includes the shipping of these materials to the site from an origin of 60 miles. Project operations produce gold concentrates as a final product. The project GHG emissions estimate includes the shipping of the concentrates a distance of 145 miles. Life cycle GHG emissions include indirect emissions associated with materials manufacture or production of gold products. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions, found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and

manufacturing information for those raw materials is also not known, calculation of life cycle emissions would be speculative. The inclusion in the DEIR analysis of indirect GHG emissions from materials used by the project or the subsequent manufacturing of gold products produced using the concentrates from the proposed project is not warranted.

Conclusion

Therefore, consistent with state guidance, a lifecycle analysis of GHG emissions is not warranted for the project-specific CEQA analysis in the DEIR; and the DEIR's GHG impact analysis is adequate for purposes of CEQA.

Master Response 27 - Greenhouse Gas Thresholds

Comments

Several commenters asserted that the operational and construction greenhouse gas (GHG) thresholds set by the County for the Project's DEIR are inappropriate often stating that the County should have chosen thresholds that are lower or are "net-zero" such that any emission of GHGs over baseline would be considered a significant and unavoidable impact. For the reasons set forth below, the County's decision to choose emission of 1,100 Metric Tons (MT) of Carbon Dioxide Equivalent (CO2*e*) per year as the construction threshold and emission of 10,000 Metric Tons of Carbon Dioxide Equivalent (CO2*e*) per year as the operational threshold is authorized under the CEQA Guidelines and is supported by substantial evidence; thus, the DEIR properly analyzed impacts by using these thresholds.

Discussion

As stated in CEQA Guidelines Section 15064.7(b), "Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects … Lead agencies may also use thresholds on a case-by-case basis as provided in Section 15064(b)(2)." Further, as stated in CEQA Guidelines Section 15064.7(c), "When adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." As defined in CEQA Guidelines Section 15384(a), Substantial Evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."

As stated on page 4.3-42 of the DEIR, "At this time, neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project." Pursuant to the authority granted to lead agencies to determine the appropriate threshold for GHG emissions impacts (and other impacts) under CEQA Guidelines Sections 15064.7(b) and 15064.7(c), the County considered the GHG emissions thresholds that other California agencies had selected for CEQA analysis and considered the context of each of those thresholds. Pages 4.3-42 through 4.3-43 of the DEIR includes discussion of the GHG emissions thresholds set by the Sacramento Metropolitan Air Quality Management District (SMAQMD), the Placer County Air Pollution Control District (PCAPCD), the Bay Area Air Quality Management District (BAAQMD), and the South Coast Air Quality Management District (SCAQMD) as a basis for the County's selection of the GHG emissions thresholds to be applied to the Project.

As discussed on page 4.3-43 of the DEIR, while the nearby PCAPCD uses a construction emissions threshold of 10,000 MT CO2*e*, the County conservatively chose to apply the lower construction emissions threshold of 1,100 MT CO2*e* per year used by SMAQMD for construction

phases of land use development projects. As a basis for choosing 10,000 MT CO2*e* as the threshold of significance for operational GHG emissions, the DEIR provided the following reasoning: "For operations, because the project is an industrial project that includes stationary sources (i.e., diesel generators used for emergency power), the project's GHG emissions were compared to the 10,000 MT CO2*e* per year quantitative threshold, which, as described above, is used by SMAQMD, PCAPCD, BAAQMD, and SCAQMD for industrial and/or stationary source emissions of GHGs. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 MT CO2*e* per year threshold in numerous CEQA documents where those air districts are the lead agency." (DEIR, p. 4.3-43.)

Various commenters presented arguments as to why a lower threshold would be preferable; however, consistent with CEQA Guidelines Section 15384(a), the County's reasoned consideration of other agencies' GHG thresholds and selection of the most appropriate thresholds based on a comparison of the Project to the various categories used by other agencies constitutes substantial evidence as it provides "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (14 CCR § 15384(a).)

Various commenters also asserted that the Project's DEIR should have evaluated emissions against a net zero GHG threshold based on the 2017 Scoping Plan and statewide GHG reduction goals. However, these commenters' opinions that any project that results in GHGs above net zero should be considered significant is inconsistent with the statewide guidance, as described in the DEIR on page 4.3-29:

> The 2017 Scoping Plan further provides that "the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

As discussed above, the CEQA Guidelines allow a CEQA lead agency to determine its own thresholds for environmental impacts (including GHG emissions), and explicitly provides that an agency may consider thresholds adopted by other agencies provided that such decision is supported by substantial evidence. The County's reasoned consideration of thresholds set by other expert agencies and adoption of thresholds that are similar to those used by other agencies constitutes substantial evidence for the GHG emissions thresholds used by the County and the associated GHG emissions impact analyses.

Conclusion

Therefore, the use of these GHG thresholds to determine the significance of the Project's GHG impacts is appropriate and legally correct pursuant to CEQA.

Master Response 28 - Greenhouse Gas Credits

Comments

Several commenters asserted that Mitigation Measure 4.3-7(b) is inadequate based on the holding in *Golden Door Properties, LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, and that the Mitigation Measure is unenforceable, impermissibly delegates verification and enforcement authority to third parties, lacks specific performance standards, is deferred mitigation, fails to mitigate for the environmental impacts of offset projects, fails to include onsite mitigation, should involve annual purchases of credits rather than a one-time purchase, does not

require that the offsets comply with CARB protocols, and should not allow purchase of offsets based on forecasted reductions.

Discussion

While several commenters compared the mitigation measure that was set aside in the *Golden Door* case to Mitigation Measure 4.3-7(b) in the Project's DEIR, these measures are factually distinguishable. The mitigation measure in *Golden Door* did not require that the carbon credits purchased by the applicant in that case be based on registries that are CARB approved and did not even mention the concept of protocols. This was one of the major factors that lead to the Court's decision that the mitigation measure requiring purchase of carbon credits was inadequate in that case. Conversely, Mitigation Measure 4.3-7(b) in the Project's DEIR includes explicit language requiring that the carbon credits are issued under CARB approved registries (i.e., Climate Action Reserve, the American Carbon Registry, or Verra). Likewise, while the court in *Golden Door* found that a carbon offset mitigation measure's failure to incorporate "additionality" requirement was a fatal flaw, Mitigation Measure 4.3-7(b) in the Project's DEIR clearly states that the carbon offset meet additionality requirements.

Several commenters asserted that Mitigation Measure 4.3-7(b) is unenforceable because the carbon credits could be generated in states or countries outside of CARB's jurisdiction. Mitigation Measure 4.3-7(b) requires that any carbon credits used for mitigation be obtained from a CARB-approved registry and further, comply with CARB-approved protocols to provide certainty that mitigation will be provided consistent with CARB standards. Even though no new impact has been identified, to provide an additional level of enforcement certainty, the County has modified Mitigation Measure 4.3-7(b), as shown below, to require that all carbon credits need to be generated within the State of California.

Commenters also opined that Mitigation Measure 4.3-7(b) impermissibly delegates verification and enforcement authority to third parties, purportedly because the measure requires that protocols for credits adhere to the principles set forth in the program manuals of each of the listed carbon credit registries. Mitigation Measure 4.3-7(b) clearly requires that the carbon credits comply with CARB-approved registries that implement specific protocols, so the additional requirement that the protocols comply with registry manuals does not in any manner impermissibly delegate the authority to develop protocols.

Commenters opined that Mitigation Measure 4.3-7(b) is inadequate because it lacks specific performance standards; however, Mitigation Measure 4.3-7(b) is legally adequate because it includes specific requirements for the type, quantity, source of carbon credits and specifies that the credit achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions. Nonetheless, to aid the County in enforcement of the mitigation measure, the DEIR now includes a flowchart (attached to the FEIR as Appendix F) to provide more detail on the specific performance standards required to ensure effective mitigation. Commenters also asserted that Mitigation Measure 4.3-7(b) constitutes impermissible deferred mitigation, because allegedly Mitigation Measure 4.3-7(b) lacks adequate performance standards. As discussed above, Mitigation Measure 4.3-7(b) includes specific performance standards, which have been augmented with even more specificity in the FEIR.

Commenters also asserted that Mitigation Measure 4.3-7(b) is improper because it fails to mitigate for the environmental impacts of offset projects. GHG offsets projects avoid, destruct, or sequester CO_2e emissions. GHG offsets projects may be subject to environmental review such

as CEQA or NEPA; however, most GHG offset projects do not require environmental analysis as they do not result in adverse environmental impacts. For example, landfill gas destruction and beneficial use carbon offsets collect and combust landfill gas at an existing landfill and do not generate adverse environmental impacts. The various commenters raising this issue did not provide any evidence that GHG offset projects result in foreseeable environmental impacts. Therefore, analysis of impacts from GHG offset projects is not necessary.

Commenters asserted that Mitigation Measure 4.3-7(b) fails to include onsite mitigation for the Project's construction GHG emissions. However, Mitigation Measure 4.3-7(b) mitigates the Project's construction GHG emissions impacts to a less than significant level, so there is no need of further mitigation for this impact, whether onsite or offsite. There is no specific requirement that GHG emission impacts be mitigated onsite. In addition, as discussed on page 4.3-91 of the DEIR, "because climate change is a global phenomenon, a single project could not generate enough GHG emissions to contribute noticeably to climate change. However, the combination of GHG emissions from a project with other past, present, and future projects (including global anthropomorphic activities) could contribute substantially to the world-wide phenomenon of global climate change and the associated environmental impacts." Therefore, the proposed project's GHG emissions would be a local contribution to a global impact, and the location of offset mitigation is not a prerequisite for effectiveness. Even so, Mitigation Measure 4.3-7(b) was changed (as shown below) to limit to offset projects to be located within California.

Commenters also asserted that Mitigation Measure 4.3-7(b) should involve annual purchases of credits rather than a one-time purchase. However, the required one-time purchase of carbon credits mitigates the construction emissions of the Project to a less than significant level, even if such emissions occurred over several years. Moreover, the amount of mitigation required to be purchased if the Project construction schedule were spread out over several years, would likely be less than under the assumed one-year project construction schedule. For example, the current assumed one-year construction schedule results in a GHG offset responsibility of 2,345 MT CO_2e (3,445 MT CO_2e – 1,100 MT CO_2e) while under a two-year construction schedule where hypothetically, 60% of activity occurs in year 1 and 40% activity occurs in year 2, the offset responsibility would be reduced to 1,245 MT CO_2e ([year 1 2,067 MT CO_2e – 1,100 MT CO_2e] + [year 2 1,378 MT CO_2e – 1,100 MT CO_2e]).

Commenters also asserted that Mitigation Measure 4.3-7(b) does not require that the offsets comply with CARB protocols and should not allow purchase of offsets based on forecasted reductions. As discussed previously, Mitigation Measure 4.3-7(b) clearly requires that that the offsets comply with CARB protocols. Purchase of carbon credits based on forecasted reductions is a standard approach to implementation of GHG mitigation in California; however, based on input from commenters, Mitigation Measure 4.3-7(b) has been revised to require only carbon credits based on past reductions in GHG emissions.

Even though the DEIR thoroughly addressed all impacts and mitigation, based on comments received on the DEIR, Mitigation Measure 4.3-7(b) (see page 4.3-96 through 4.3-99 of the DEIR) has been revised as set forth below (additions in double underline, deletions in ~~strikethrough~~):

4.3-7(b) ***Carbon Offsets – Construction Emissions.***
Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets

equaling 2,345 MT CO2e, which was calculated by subtracting 1,100 MT CO2e (threshold) from the construction emissions generated by the project.

Carbon Offset Standards – Eligible Registries, Acceptable Protocols and Defined Terms:
"Carbon offset" shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard). This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities within the Nevada County region. The Project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols. Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the "Reporting and Enforcement Standards" below is submitted to the County demonstrating that each registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies:

i) Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and
ii) Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:

a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,
d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time.
e. Be approved by the California Air Resources Board, and be compliant with 17 CCR § 95972 and AB 32 (the California Global Warming Solutions Act of 2006) to the extent applicable to voluntary offsets.

Further, any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past ~~or forecasted~~ reduction or sequestration of one MT of CO2e that is "not otherwise required" (CEQA Guidelines Section 15126.4[c][3]). Each carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows:

i) *"Additional" means that the carbon offset is ~~not~~ in addition to: (1) any greenhouse gas emission reduction otherwise required by law or regulation; ~~and not~~ (2) any other GHG emissions reduction that otherwise would occur; and (3) is consistent with Health and Safety Code Section 38562(d)(2);*
ii) *"Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity shifting leakage and market-shifting leakage;*
iii) *"Verifiable" means that the GHG reduction underlying the carbon offset is well documented, transparent and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI);*
iv) *"Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction;*
v) *"Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage; and*
vi) *"Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.*

The protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below ensure that the emissions reductions required by this mitigation measure are enforceable against Rise, as the County has authority to hold Rise accountable and to take appropriate corrective action if the County determines that any carbon offsets do not comply with the requirements set forth in this mitigation measure.

The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program).

Additionally, the County shall require that all carbon offsets purchased by the Project applicant shall originate from inside the state of California.

Reporting and Enforcement Standards:
Prior to issuance of requested grading permits, Rise shall submit a report to the County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure. For purposes of demonstrating that each offset

is additional, real, permanent, quantifiable, verifiable and enforceable, the report shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offsets to be retired, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and information sufficient for the County to verify that the purchased offsets meet the requirements identified within this mitigation.

To ensure consistent and effective enforcement of this mitigation measure and to assist the County with its review of the report described above, an implementation process timeline and associated flow chart for the implementation and administration of this mitigation measure's requirements has been prepared and is attached as Appendix F to the FEIR.

If the County determines that the project's carbon offsets do meet the requirements of this mitigation measure, the offsets can be used to reduce project GHG emissions and project permits shall be issued. If the County determines that the project's carbon offsets do not meet the requirements of this mitigation measure, the offsets cannot be used to reduce project GHG emissions and project permits shall not be issued. Additionally, the County may issue a notice of non-consistency and cease permitting activities in the event that the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until Rise has demonstrated that the previously provided carbon offsets are compliant with the standards herein or have provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction. In the event that the project is out of compliance with this Mitigation Measure and fails to demonstrate compliance after receiving notice of said violation, the County shall have authority to impose administrative penalties, take legal action to force compliance, or to start proceedings to suspend or revoke the Project's permits.

Conclusion

As discussed above, Mitigation Measure 4.3-7(b) is distinguishable from the mitigation measure in the *Golden Door* case and complies with all legal requirements for mitigation measures involving purchase of carbon credits. Moreover, although no new impacts have been identified, the County has revised Mitigation Measure 4.3-7(b) to further address concerns raised by commenters and to clarify with certainty that the carbon credits will effectively mitigate the Project's impacts from construction-related emissions of greenhouse gas to a less than significant level. Thus, the DEIR adequately mitigates the Project's construction GHG emissions.

Master Response 29 - Near Surface Workings and Subsidence

Comments

Several commenters asserted that the Project would cause hazards due to the collapse of near surface workings, or deep mine workings when the mine is dewatered, which could result in impacts to surrounding properties (e.g., above-ground structures and residents) atop the underworkings.

Discussion

As discussed on pages 4.6-44 to 4.6-49 of the DEIR, under Impact Statement 4.6-3 related to unstable geological units, the potential collapse of near surface mine workings was evaluated and Mitigation Measure 4.6-3(c) was included in the DEIR to close six near surface mine features, resulting in a less-than significant impact relating to potential collapse of mine features.

As discussed on page 4.6-12 of the DEIR, the current water elevation in the mine is approximately 2,500 feet above mean sea level. In order to recommence mining, the underground mine must be dewatered, and groundwater entering the mine must be continuously pumped during the mining operation. When the water level in the mine workings is located near the ground surface, the drawdown of groundwater within the mine workings may increase the potential for settlement or collapse of shallow workings that were not formally closed. (see DEIR, pp. 4.6-44 to 4.6-49.) Near surface workings that are already in a dewatered state would generally not be significantly impacted by dewatering the mine. As shown on Drawing A207, including in Appendix H.6 to the DEIR, the current water level in the mine is only close to the surface in the area near the Idaho shaft near Idaho Maryland Road. All near surface mine workings were specifically evaluated by NV5 in the Geotech Review of Near Surface Features, as shown in Table 1 of Appendix H.6.

As discussed on page 4.6-44 of the DEIR, potential for collapse of existing near-surface mine features as a result of the proposed project was evaluated by NV5, whose report was independently peer reviewed by the County's consultant, ECM. Mitigation Measure 4.6-3(c) required the closure of six mine features.

As stated on page 2 of Appendix H.6, near-surface mine features are generally more susceptible to subsidence and collapse than are deeper mine workings, because the near-surface features may be located in weaker materials (soil and weathered rock); whereas the deeper mine workings are commonly located in competent bedrock. In addition, the underground mine workings focused on removal of quartz vein materials that are generally narrow, so the collapse of a deep (e.g., 100 feet bgs) mine feature is not likely to be expressed at the ground surface. The County's independent expert ECM is in agreement with NV5 and based on the known physical characteristics of the rock units, considered a 100-foot distance below ground surface to be conservative (page 33 of Appendix H7), meaning that NV5 believed that collapse of features even closer to the surface than 100 feet bgs are unlikely to be expressed on the surface. Furthermore, flooded workings that are not already closed or proposed to be closed are greater than 165 feet below surface (see Drawing 207 in DEIR Appendix H.6) and therefore underground workings that have potential to cause subsidence at surface have been thoroughly analyzed in the DEIR.

Once the mine is dewatered, new mining excavations will be constructed as described on page 3-19 of the DEIR. To provide access to the gold mineralization, a network of tunnels and raises would be constructed throughout the life of the mine. The tunnels would be constructed in the nonmineralized rock which, at the mine, is typically meta-andesite volcanic rock. Modern ground support, which may include rock bolting and screens, would be installed in tunnels as deemed necessary to ensure a safe work environment and in accordance with best mining practices coupled with routine inspections by the US Mine Health and Safety Administration (MSHA). Therefore, it is unlikely that any new underground openings would produce a fall of ground or collapse that would affect the integrity of the mine. Except for the new Service Shaft, all of these new workings would be at least 500 feet below ground surface and therefore too deep to cause subsidence at surface even if they were to collapse. As described on page 3-19 and 3-20 of the DEIR, production blasting is used to create underground openings, and these openings are then refilled with cemented paste backfill. Backfilling re-supports the rock within and around the original opening preventing caving and resulting in stability in the deep part of the mine. This stability at

depth carries upwards, thus eliminating the possibility of the mining producing any voids that would reach the surface or near surface.

Conclusion

The DEIR's evaluation of the potential for dewatering to result in collapse of surface materials is legally adequate and based on expert analysis, independently reviewed and corroborated by the County's independent consultant.

Master Response 30 - Biological Study Technical Adequacy

Comments

Several commenters questioned the adequacy of the biological technical reports, specifically the timing and methodology of surveys.

Discussion

As summarized in section 4.4.1, "Introduction," and 4.4.4, "Method of Analysis," of the DEIR, and included as Appendix F, eleven different technical reports were prepared that characterize and analyze the biological resources, habitat, and waters within the Project site. These technical reports were prepared by biologists with over 30 years of combined local expertise in the species and environment within the Project site, and in accordance with federal, state, and local regulations and agency-authored manuals. For example, the aquatic resource delineations prepared for the Centennial Site and Brunswick Area followed U.S. Army Corps of Engineers manuals for conducting wetland delineations.[15] As another example, the botanical field surveys were conducted in accordance with the relevant California Department of Fish and Wildlife guidance.[16] These technical studies were then peer reviewed by the County and their biological consultant. The peer review was conducted by a biological resources firm (Madrone) with similar local experience that resulted in several rounds of review and revision prior to the County's acceptance of these reports for use in the DEIR. As a result, numerous biological experts with local knowledge have analyzed, and reviewed the characterization and analysis included in these biological technical reports prior to their use and incorporation into the DEIR. Specifics regarding methodology and timing of surveys for rare plants is found in Master Response 31 (Rare Plants) and amphibians is addressed in Master Response 38 (Foothill Yellow Legged Frog and California Red Legged Frog).

In addition to the biological resources assessment reports and aquatic resource delineations, management plans were also prepared in accordance with Nevada County Land Use and Development Code (Section L-II 4.3.3) to minimize Project impacts to certain biological resources (i.e., aquatic resources, Pine Hill flannelbush) to the maximum extent possible. These management plans were similarly peer reviewed by the County's biological consultant.

The biological studies and management plans were the basis of scientific evidence used by the County to determine whether the Project would trigger any of the thresholds of significance identified in Chapter 4.4, Biological Resources, of the DEIR, and thus, result in significant effects to biological resources. The thresholds of significance used in the DEIR are based on Appendix G of the CEQA Guidelines (Section IV).

[15] *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratories, 1987) and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys and Coast Regions* (Version 2.0) (Corps, 2010).
[16] *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018).*

In general, the biological resources surveys conducted for this Project were reconnaissance-level in nature, and were conducted primarily to identify *habitat* for special-status species. Protocol-level surveys were conducted for plants, which are not mobile. The wildlife species with potential to occur in the area are highly mobile; as a result, negative protocol-level surveys would not be informative in regard to their presence or absence from a site during construction a year or more in the future. As a result, it is common practice to adopt a more conservative approach whereby one maps habitats on-site and assumes a species could be present if suitable habitat is present. Focused surveys for a species are conducted shortly prior to construction to ensure that any individuals of a species that are present at that time are appropriately protected and avoided.

Conclusion

Therefore, the DEIR thoroughly identified, analyzed and mitigated, as necessary,_ Project impacts to biological resources.

Master Response 31 - Rare Plants

Comments

Several commenters assert that the rare plant surveys were not conducted during the appropriate times of the year, and thus, certain special-status plants occurring on the Sites may not have been detected.

Discussion

As summarized in DEIR section 4.4.1 and Appendix F, protocol-level rare plant surveys were conducted within the Project site in December 2019 and July and August 2020. The survey dates in July and August 2020 were at a time of year when most of the potential rare plants would be blooming. In addition, following release of the DEIR, an additional rare plant survey of the Project site was conducted in June 2022 to address comments regarding the potential that July and August 2020 surveys were conducted outside published blooming periods and may have missed potential rare plants that may bloom earlier in the year. Please see Appendix G to this Final EIR for the Technical Memo for Botanical Resource Surveys at the Brunswick Mine and Centennial Study Areas (June 2022). The June 2022 rare plant survey did not identify any new rare or special-status plant species but did identify that many of the Pine Hill flannelbush had burned in the recent fire and germination of seedlings around these plants existed. In addition, during Visual Encounter Surveys for foothill yellow-legged frog in June 2022, two populations of giant checkerbloom (*Sidalcea Gigantea*) were identified in upland riparian areas adjacent to South Fork Wolf Creek. Giant checkerbloom has no federal status and is CNPS list 4.3 (not very threatened in California and limited distribution or infrequent throughout a broader area in California).

As summarized in DEIR section 4.4.2, 23 CNPS ranked plants and special-status plant species were identified as occurring within a nine Quad search of the Project site. The majority of the identified plant species were dismissed from further consideration in the DEIR due to a lack of suitable habitat on the Project site, being substantially outside of the known range and distribution for the plant species, or both. Ten plant species were analyzed in the DEIR (see DEIR section 4.4.2 and Impact 4.4-1.). Of these ten species, only four have a moderate to high potential of occurring within the Project site, including the Scadden Flat checkerbloom (List 1B.1), brownish beaked-rush (List 2B.2), Sierra blue grass (List 1B.3), and Pine Hill flannelbush (federally endangered and List 1B.2).

Surveys for those List 1 and List 2 species with a potential to occur within the Project site were conducted within the appropriate blooming periods. Surveys were conducted on June 20, 21, and 28. The blooming periods for potential special-status species plants that may occur onsite are

May through August with the additional surveys conducted on June 20, 21, and 28, covering each of the List 1 and List 2 species except for brownish beaked-rush and Scadden Flat checkerbloom with blooming periods between July and August. However, brownish beaked-rush and Scadden Flat checkerbloom have a low potential to occur within the Project site and neither species was identified during the July and August 2020 surveys of the project site.

In addition, a reference site visit was conducted for the finger rush at the location identified within the mapped CNDDB location for the species on June 24, 2019, and it was determined that the species was identifiable and therefore, it would have been identifiable during the special-status plant surveys conducted in early July 2019. The species was not identified and is considered to have a low potential to occur within any of the proposed areas of disturbance. Chaparral sedge, a perennial herb, and Red Hills soaproot, a perennial bulbiferous herb, have a low potential to occur within the areas of proposed disturbance and they were not identified during special-status plant surveys conducted in early July 2019. Both species are perennial and neither species was identified within the areas of proposed disturbance based on a comprehensive survey and keying out the characteristics of each plant species identified during the special-status plant species surveys. Neither the finger rush (April to June blooming period), chaparral sedge (March to June blooming period), or Red Hills soaproot (May to June blooming period) were documented within the Project site during the botanical surveys conducted on June 20, 21, and 28, 2022.

Disturbance related impacts to CNPS list 3 and list 4 species would not be considered a "significant" impact requiring additional mitigation under CEQA Guidelines Section 15380. As a result, impacts to List 3 and List 4 species identified as potentially occurring within the Project site, including the Humboldt lily and Sierra brodiaea (both List 4 Species,) do not meet the CEQA Guidelines Section 15380 definitions as either "endangered," "threatened," or "rare". Therefore, per the analysis of special-status plant species covering the entirety of the Project disturbance areas, special-status plant surveys were conducted within the known blooming season for each of the potential special-status plant species identified as part of the initial background research and analysis except for three (3) species that are CNPS list 1 and 2 species. Those species include the finger rush, chaparral sedge, and Red Hills soaproot and the June 2022 surveys confirmed that none of these three species are located within the Project site.

Based on this extensive technical analysis and detailed peer review, the DEIR concluded Project-related surface disturbance could have a potential to impact special-status plant species or habitat that may contain special-status plant species. As a result, the DEIR included Mitigation Measure 4.4-1 requiring a management plan for the impacts to the Pine Hill flannelbush and pre-construction special-status plant species surveys. The preconstruction special-status plant survey would include an additional survey for these and other special-status plant species with potential to occur within the Project's areas of disturbance.

Conclusion

Therefore, special-status plant surveys were conducted within the known blooming season for each of the potential special-status plant species occurring within the project area. Nevertheless, potentially occurring special-status plant species that may not have been in bloom during previously conducted surveys would 1) be identified prior to the implementation of the proposed disturbance and 2) would be fully mitigated per the mitigation measures outlined within the DEIR to avoid, minimize, and mitigate for potential impacts to special-status plant species.

Master Response 32 - Temperature of Mine Water Discharge

Comments

The County received several comments that asserted the Project would cause significant impacts due to increases in natural water temperature in the South Fork of Wolf Creek, which could lead to downstream effects on aquatic organisms and violation of NPDES permitting requirements for treated water discharge.

Discussion

Prior to discharging any mine water to the South Fork of Wolf Creek, the mine operator must first obtain coverage under the Central Valley Regional Water Quality Control Board (RWQCB) General Order for Limited Threat Discharges to Surface Waters (R5-2022-006), which General Order requires that natural water temperatures in the creek not be raised by more than 5°F, in addition to monitoring requirements that will be included in the Notice of Applicability issued by the RWQCB. Further, during periods of low flow in the creek, when discharge temperature could potentially result in an exceedance of the 5°F limit, discharge volume reductions will be used to ensure compliance with the General Order and to ensure no significant impacts related to increased water temperature will occur.

As discussed on page 4.8-31 of the DEIR, the RWQCB adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. The Basin Plan, at page 2.3, states that the "…beneficial uses of any specifically identified water body generally apply to its tributary streams." The Basin Plan does not specifically identify beneficial uses for South Fork of Wolf Creek but does identify present and potential uses for the Bear River, to which the South Fork of Wolf Creek and Wolf Creek, is tributary. As stated in note 2 of Table 2-1 of the Basin Plan, any segments with both COLD and WARM beneficial use designations will be considered COLD water bodies for the application of water quality objectives. Therefore, the COLD beneficial use is applicable to South Fork Wolf Creek.

Mitigation Measure 4.8-1(a) requires the applicant to submit a Notice of Intent (NOI) to the RWQCB and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. NPDES CAG995002 General Order R5-2022-006 requires that natural temperatures not be increased by more than 5°F (2.8°C). Regular receiving water monitoring is required with a frequency specified in the NOA sufficient to evaluate the impacts of the discharge and compliance with the General Order. Regular receiving water monitoring data, measured at the upstream and downstream monitoring locations identified in the NOA, are used to determine compliance. (p. 50 of R5-2022-006).

As stated on page 108 of Appendix K.2, after being pumped from the mine, the water would be stored within a surface pond before treatment and discharge. The temperature of the water within the mine workings and drains remains relatively constant, between 14 and 15 degrees Celsius (~58°F). During the summer the temperature of the mine water would be comparable to the temperature of the receiving water in South Fork Wolf Creek. Measured temperatures in South Fork Wolf Creek are greater than 11.7°C (53°F) from May though September (see Table 4 below) and therefore water temperature of the mine discharge is not of concern during these months. During the winter, the ambient temperature should cool the water in the pond (see below for more discussion). In addition, the dilution with upstream flows would lower temperatures depending on the rate of flow and temperature versus the discharge from the water treatment plant. As is

presented in the record of streamflow in appendix I of Appendix K.2, there are times when natural temperature of South Fork Wolf Creek is low, which coincide with low flow rates. If necessary, the reduction in mine water discharge would provide an operational tool to ensure compliance with the temperature requirements of the water discharge permit. As such, if the discharge water temperature and volume would result in a temperature increase above 5°F during low flow rate periods, the Project would reduce discharge volume to stay within the temperature range allowed by the General Order during those low flow periods. While flows would not likely need to be reduced below 850 gpm to meet discharge temperature requirements (see discussion below), flows could be reduced below the maximum discharge of 2,500 gpm by simply reducing the pumping rate from the mine into the pond for the period in which the reduction is required. In an unlikely scenario where discharge flow needs to be reduced below 850 gpm to achieve discharge temperature requirements, additional water could be stored in the pond, and if necessary, the maintenance pumping rate could be reduced to allow water storage in the lowest levels of the mine until the flow reduction is no longer necessary to meet temperature requirements.

The natural temperature of South Fork Wolf Creek is correlated to the ambient air temperature with seasonal highs and lows regulated by ground contact (see Figure 25 below). A lower ambient temperature will also influence the temperature of water in the water treatment pond.

The calculation of the heat loss from the pond will vary depending on the weather conditions throughout the operation. However, the operation can influence the water discharge temperature in order to meet the requirements based on natural creek temperature. The flowrate of the mine water discharge can be reduced when natural temperature of South Fork Wolf Creek is low and coincides with low flow rates, if necessary to ensure compliance with the General Order. The maximum discharge rate of 2,500 gpm is equal to 1,249,500 pounds of water per hour and the operational discharge rate of 850 gpm is equal to 424,800 pounds of water per hour. One BTU is the amount of heat energy required to raise one pound of water by 1°F. Assuming an extreme case where mine water temperature must be reduced by 10°F, the required heat loss at 850 gpm would be 4.2 million BTU/hr versus 12.5 million BTU/hr at 2,500 gpm. The reduction of flow would therefore dramatically influence the water temperature of the discharge given a constant heat loss from the pond.

The majority of heat loss from the pond surface is a result of evaporation and the surface heat loss can be expressed as the heat loss factor multiplied by the temperature difference and surface area of the pond. Assuming mine water temperature of 58.1°F[17] and ambient air temperature of 39.3°F[18], the surface area of the pond of 113,587 ft^2, and a surface heat loss factor of 5.5 BTU/hr[19], the heat loss from evaporation would be up to 11.7 million BTU/hr (~2,470 BTU/ ft^2/day). This number is similar to the extreme case requirement of 12.5 million BTU/hr at 2,500 gpm and approximately 3 times larger than the 4.2 million BTU/hr requirement at 850 gpm.

Heat loss from radiation is on the order of 2,400 to 3,600 BTU/ ft^2/day and conduction less than 500 BTU/ ft^2/day. Solar radiation generally adds between 300 to 2,800 BTU/ ft^2/day and atmospheric radiation generally adds between 2,400 to 3,200 BTU/ ft^2/day (Hanford 1972). Heat gain from solar radiation would be lower during the late/fall or winter and the net heat loss from these processes would be minor in comparison to the heat loss from evaporation.

[17] 14.5 degree Celsius is median of estimated range on page 108 of Appendix K.2
[18] Average air temperature in November 2020 measured at SF Wolf Creek Discharge point
[19] Surface heat loss factor of 5.5 is midrange of values for sheltered position with wind velocity of 2 to 5 mph. https://www.engineeringtoolbox.com/swimming-pool-heating-d_878.html . Average windspeed in area is approximately 6 mph. https://wind.willyweather.com/ca/nevada-county/grass-valley.html

This example demonstrates that substantial cooling would occur in the water treatment pond during periods of low temperature and low flows in South Fork Wolf Creek. The reduction of discharge flow would reduce the required heat loss proportionally and provides a feasible tool to ensure compliance with the temperature requirements for the mine water discharge.

Conclusion

In summary, the Project will be subject to the State's General Order, which requires that discharge not increase natural temperatures of the creek by more than 5°F, and discharge flow reduction provides an adequate mechanism to ensure compliance even during low flow conditions in the creek. The EIR analysis demonstrates that the proposed discharge of treated water into South Fork Wolf Creek is regulated by the State permitting process and would not result in adverse effects to downstream water quality and aquatic organisms.

References

Hanford (Hanford Engineering Development Library). 1972. *Cooling Ponds – A Survey of the State of the Art* Richland, Washington. Available at: https://www.osti.gov/servlets/purl/5150728

Table 4
Average Monthly Water and Air temperature Measured at South Fork Wolf Creek Discharge Point

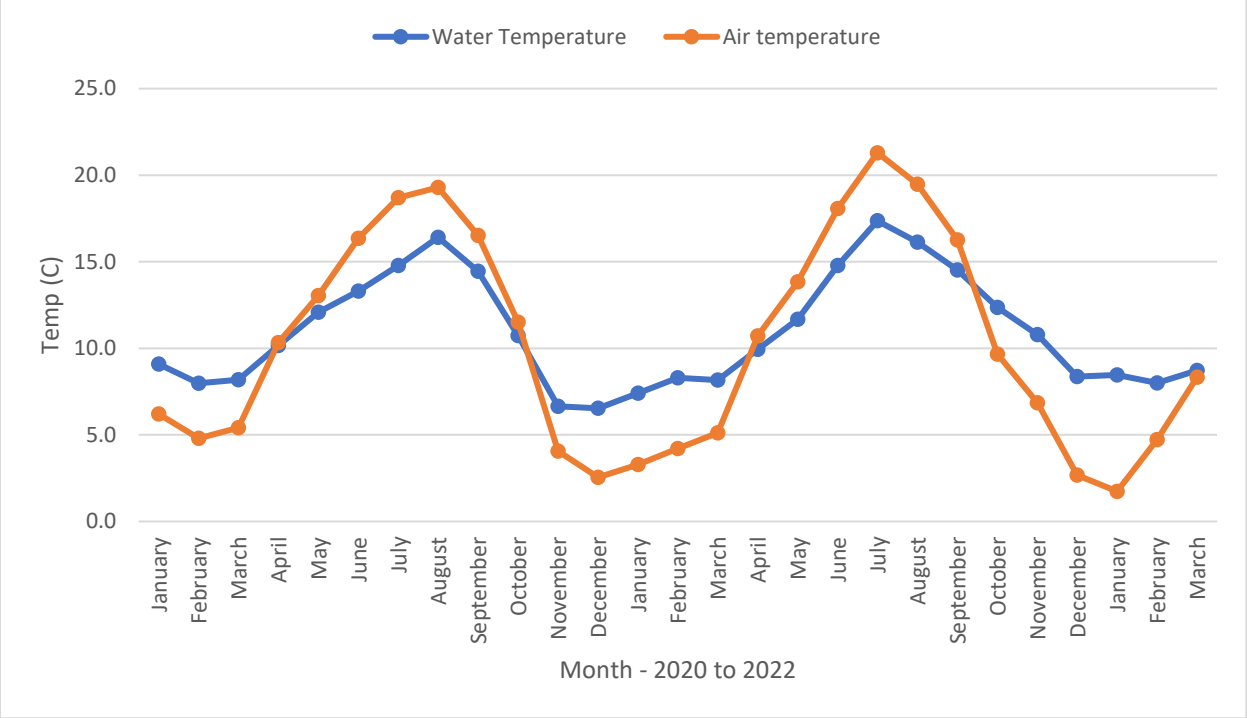
Year	Month	Water Temperature (C)	Air Temperature (C)	Water Temperature (F)	Air Temperature (F)
2020	January	9.1	6.2	48.4	43.2
2020	February	8.0	4.8	46.4	40.6
2020	March	8.2	5.4	46.7	41.7
2020	April	10.2	10.3	50.3	50.6
2020	May	12.1	13.1	53.7	55.5
2020	June	13.3	16.3	56.0	61.4
2020	July	14.8	18.7	58.6	65.7
2020	August	16.4	19.3	61.5	66.7
2020	September	14.4	16.5	58.0	61.7
2020	October	10.7	11.5	51.3	52.7
2020	November	6.6	4.1	44.0	39.3
2020	December	6.5	2.5	43.8	36.6
2021	January	7.4	3.3	45.3	37.9
2021	February	8.3	4.2	46.9	39.6
2021	March	8.2	5.1	46.7	41.2
2021	April	9.9	10.7	49.9	51.3
2021	May	11.7	13.8	53.0	56.9
2021	June	14.8	18.1	58.6	64.5
2021	July	17.4	21.3	63.3	70.3
2021	August	16.1	19.5	61.0	67.1

2021	September	14.5	16.3	58.2	61.3
2021	October	12.4	9.7	54.3	49.4
2021	November	10.8	6.9	51.4	44.3
2021	December	8.4	2.7	47.1	36.8
2022	January	8.5	1.7	47.2	35.1
2022	February	8.0	4.7	46.4	40.5
2022	March	8.7	8.3	47.7	47.0

Notes:
Data provided by Balance Hydrologics.

Water and air temperature are collected continuously (15-minute intervals) by instruments installed and maintained by Balance.

Figure 25
Water and Air Temperature Measured at South Fork Wolf Creek Discharge Point (Plotted from Table 4)



Master Response 33 - Groundwater Dependent Vegetation

Comments

Several commenters have expressed concerns about the impact of mine dewatering, and lowering of groundwater levels, on groundwater dependent vegetation, which could lead to drying up of vegetation and increase in fire hazard. As explained below, this concern is addressed in the Wildfire chapter of the DEIR (DEIR, p. 4.13-21).

Discussion

Most vegetation in the Project are not groundwater dependent. Terrestrial vegetation, such as Ponderosa Pine, Incense Cedar, Douglas Fir, and California Black Oak in the project area have roots depths typically less than 6 feet[20] which are within the unsaturated zone (above the water table and capillary fringe). Mature ponderosa pines put down a root to depths of more than 2 m (6 ft) in porous soils, but seldom more than 1 m (3 ft) in heavy clay soils. Exceptions occur in soils underlain by rock with deep fissures, where roots have been observed along cut banks at depths of 11 to 12 m (35 to 40 ft). However, the main mass of roots is concentrated within the top 60 cm (24 in) of the soil mantle[21]. Plant roots occupy this unsaturated zone because it contains air, and oxygen is essential to root respiration. As discussed on page 4.13-21 of the DEIR, in the areas away from the creeks and valleys, the depth to groundwater is typically greater than 10 feet and, in many cases, may be 100 feet or more. In addition, the normal seasonal fluctuation in the depth to groundwater may be 10 feet to 30 feet or more. Thus, in the areas away from the creeks, the existing groundwater surface is below the typical depth of rooted vegetation and tap roots from trees, especially during the drier months when the depth to groundwater is at its greatest. Therefore, terrestrial vegetation, which is not groundwater dependent, will not be affected by groundwater drawdown induced by mine dewatering.

At the location of the perennial streams, South Fork Wolf Creek and Wolf Creek, the groundwater level is at or above the level of the streambed. These streams have developed valleys along their courses. Groundwater levels are shallow in the valley bottoms. Hydrophytic vegetation are plants which have adapted to growing in the low-oxygen conditions associated with prolonged saturation or flooding. These plants therefore are dependent on the saturated soil conditions provided by the capillary fringe above the water table. In order to create these saturated soil conditions, the water table must be close to surface and the soil type must have small pores, such as silt or clay, in order to create a sufficient height of capillary fringe. Meadows develop in areas where there is a shallow water table and an accumulation of fine-textured soils, often with rich organic layers that are needed to draw water to shallow rooted meadow plants by capillary rise[22]. As discussed on page 4.13-21 of the DEIR, discharge of treated water to South Fork Wolf Creek would prevent the lowering of the groundwater levels along the reach of that creek because the full dewatering volume would be discharged to the creek, whereas only a small fraction of the groundwater that would be removed from the subsurface would come from that area. Thus, the potential increased recharge due to the enhanced base flow in South Fork Wolf Creek would more than offset any effects from dewatering in the area near the creek. In order to clarify that groundwater drawdown induced from the mine would not impact groundwater dependent (phreatophytic) vegetation, Itasca Denver prepared a memo showing the simulated drawdown in selected meadows which is attached to the Final EIR as Appendix H. These three meadows (Brunswick Site, Empire Mine Park, and Loma Rica) would experience minimal drawdown, even without consideration of the mine water discharge to South Fork Wolf Creek. With the addition of 1.9 cfs (850 gpm) (average maintenance dewatering rate), future mining is predicted to have no to very little groundwater drawdown in the vicinities of the meadows. (see Itasca Memo – Simulated Drawdown of Selected

[20] It should be noted that the root depths referred to on page 121 of Appendix K.2 represent extreme cases. Mature ponderosa pines put down a root to depths of more than 2 m (6 ft) in porous soils, but seldom more than 1 m (3 ft) in heavy clay soils. Exceptions occur in soils underlain by rock with deep fissures, where roots have been observed along cut banks at depths of 11 to 12 m (35 to 40 ft). The main mass of roots is concentrated within the top 60 cm (24 in) of the soil mantle.
(see source material at (https://www.srs.fs.usda.gov/pubs/misc/ag_654/volume_1/pinus/ponderosa.htm)
[21] https://www.srs.fs.usda.gov/pubs/misc/ag_654/volume_1/pinus/ponderosa.htm
[22] https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5434345.pdf

Meadows attached to the Final EIR as Appendix H). As such, this impact is still considered less than significant.

Conclusion

The DEIR provides substantial evidence (Chapter 4.13) that the dewatering operations would not adversely impact surface level vegetation leading to the indirect effect of providing more dry fuel sources and increasing wildfire risk. Appendix H to this Final EIR provides supplemental evidence, corroborating the findings in the DEIR that dewatering would not increase fire risk due to reduced groundwater levels.

Master Response 34 - Resident Fish

Comments

Several commenters questioned the Project's potential impact on resident fish and their habitat in South Fork Wolf Creek. As discussed below, brown trout and bluegill were identified within South Fork Wolf Creek; however, these are not special-status species, and rather, are invasive species. Nonetheless, the Project will not cause significant impacts to fish due to the requirement that the Project obtain coverage under the Central Valley Regional Water Quality Control Board's limited threat discharge order, which requires that discharge meet water quality standards and limit temperature change to receiving waters.

Discussion

The March 23, 2022 CDFW reporting on electrofishing samples collected by the agency in early March 2022 at three (3) distinct sampling locations identified two fish species, brown trout and bluegill, within South Fork Wolf Creek (see Agency Letter 3 of this Final EIR). Both the brown trout and bluegill are non-native species and though they may be resident within stretches of South Fork Wolf Creek, these species have no state or federal protections given their status as non-native fish species.

The sampling location closest to the daylighting of South Fork Wolf Creek within the Brunswick Site included three brown trout that were considered to be of "poor body condition" and "the fish were thinly distributed with plenty of unoccupied habitats between fish occurrences." Furthermore, CDFW concluded that "these preliminary data suggest that Brown Trout migrate into this site from more ideal spawning and rearing habitats downstream."

CDFW also concluded that fish captured in Site 2 were of good body condition with healthy fins and no visible signs of disease. Site 2 had the highest fish density and diversity of Brown Trout sizes suggesting that Site 2 is a spawning and rearing location for Brown Trout. Fish captured in Site 3 were of good body condition with healthy fins and no visible signs of disease. The results of CDFW electroshocking suggest that the best habitat within South Fork Wolf Creek between the Brunswick Site and Highway 174, where the creek is culverted underground along Highway 174 before daylighting closer to the City of Grass Valley, lies within the stretch within the Bennett Street Grasslands when compared to the location closer to the Brunswick Site upstream where there were fewer non-native fish that were in "poor body condition."

For potential indirect downstream impacts to fish species and aquatic and riparian habitat along South Fork Wolf Creek, including the area located within the Bennett Street Grasslands, from the proposed 5.6 cfs discharge limit within South Fork Wolf Creek, the applicant must remain in compliance with the National Pollutant Discharge Elimination System (NPDES) discharge requirements covering the discharge to South Fork Wolf Creek. The NPDES discharge requirements are mandated by the State Water Resources Control Board. The Clean Water Act

(CWA) requires all point source discharges from mining operations, including discharges from associated impoundments, be authorized under an NPDES permit. The NPDES program regulates discharges from three general categories of mining activities as well as the considerations associated with abandoned mines. For the proposed project, the hard rock mining NPDES permit discharge limits must be adhered to.

Therefore, remaining in compliance with the NPDES discharge requirements covering the discharge to South Fork Wolf Creek will ensure that the proposed discharge will not have an adverse effect on the South Fork Wolf Creek aquatic ecosystem and any sensitive aquatic biological resources, including fish and aquatic habitat along South Fork Wolf Creek. Remaining within the NPDES discharge limit of 5.6 cfs, potential bank erosion, bed scour, and channel avulsion would not be substantial and water quality standards for constituents and parameters of concern would remain in compliance. These parameters of concern include temperature, siltation, and turbidity within South Fork Wolf Creek and downstream to the Bennett Street Grasslands.

Therefore, negative impacts to aquatic resources, including fisheries, downstream of the Brunswick Site from excess siltation and turbidity, as well as from exceeding safe threshold limits caused by the proposed discharge, would be avoided and minimized by staying within the required NPDES discharge limits as part of the proposed discharge to the South Fork Wolf Creek. This would include minimizing any potential changes in water temperature per the NPDES discharge limits and requirements.

Conclusion

Any potential impacts to fish and aquatic habitat within South Fork Wolf Creek would be less than significant given the stringent requirements of the NPDES discharge requirements and the high levels of water treatment that will be implemented prior to discharging to South Fork Wolf Creek.

Master Response 35 - Discharge to South Fork Wolf Creek

Comments

Several comments received on the DEIR focus on the discharge of water to South Fork Wolf Creek from the New Brunswick Industrial Site. Various comments assert the discharged water would contain pollutants, contaminate the creek, or damage the surrounding ecosystem. As demonstrated in the DEIR, any outflow of groundwater to South Fork Wolf Creek resulting from the dewatering of the Idaho-Maryland Mine will be treated in accordance with strict regulatory standards prior to discharge. In fact, the water quality of the groundwater to be discharged, after on-site treatment, will exceed the existing water quality levels of surface water in South Fork Wolf Creek.

Discussion

Dewatering Process

As discussed in the Project Description of the DEIR (Chapter 3), to reinitiate the underground mining and gold mineralization process, the Project applicant is proposing to dewater the underground mine workings of the Idaho-Maryland Mine, which has been flooded since the mid-1950s. The initial dewatering process will be accomplished by using the New Brunswick shaft to access the underground mine workings and place submersible and staged centrifugal pumps to pump the water out of the shaft through a pipeline. (DEIR, p. 3-15.) As measured by the New Brunswick shaft, the groundwater level currently sits at approximately 260 feet below ground surface (bgs). (DEIR, p. 3-15.) The submersible pump will gradually pump water out of the shaft

at approximately 5.6 cubic feet per second (cfs), or 2,500 gallons per minute (gpm). (DEIR, p. 3-15.) Over the first six-month period, the Project applicant will pump approximately 2,500 acre-feet from the underground mine workings through the pipeline and into an existing clay-lined settling pond with an approximate 40-acre-foot total capacity. (DEIR, p. 3-15.) From the clay-lined settling pond, the water will then be moved through a water treatment system to meet or exceed applicable water quality objectives and then be discharged to South Fork Wolf Creek. (DEIR, p. 3-18.) Any discharge of water to South Fork Wolf Creek will be performed under a discharge permit from the Central Valley Regional Water Quality Control Board (CVRWQCB), with required monitoring and reporting, to ensure that discharge water meets all applicable water quality standards. (DEIR, p. 4.8-28.)

Water Quality

Water samples of the groundwater from the underground mine indicate the primary constituents of concern are iron and manganese. (DEIR, p. 4.8-21). Within the New Brunswick shaft, the iron concentration ranges from 1,400 micrograms per liter (µg/L) to 1,600 µg/L. (DEIR, p. 4.8-21). The secondary drinking water maximum contaminant level (MCL) and the National Pollutant Discharge Elimination System (NPDES) effluent limit for iron are both 300 µg/L. (DEIR, p. 4.8-21). For manganese, the groundwater samples indicate concentration ranges from 230 µg/L to 270 µg/L. (DEIR, p. 4.8-21). The MCL and NPDES effluent limit for manganese are both 50 µg/L. Arsenic also was detected in the New Brunswick groundwater samples below the MCL and NPDES effluent limit of 10 µg/L. (DEIR, p. 4.8-21).

The New Brunswick groundwater samples also detected the compound cis-1 ,2-dichloroethylene (cis-1 ,2-DCE). This compound generally occurs as a breakdown product of industrial solvent trichloroethylene (TCE) or the dry-cleaning solvent tetrachloroethylene (PCE). (DEIR, p. 4.8-21). The presence of cis-1 ,2-DCE may be attributable to two potential sources: either a historic solvent used within the New Brunswick mine for equipment repair and maintenance, or a seepage from the adjacent former SPI Mill Site to the southeast. The SPI Mill Site was known to have industrial solvent impacts. (DEIR, p. 4.8-21).

Water Treatment

Groundwater from the underground mine workings will be pumped to the settling pond for water storage and removal of total suspended solids. (DEIR, p. 3-17.) The settling pond will also feature an aeration system to oxygenate the water, which will precipitate (i.e., create a solid from a solution) a significant portion of dissolved iron and manganese and be removed from the settling pond approximately every 10 years. (DEIR, p. 3-17.) Water from the settling pond will then be pumped to the proposed on-site water treatment plant (WTP) and filtered to remove the remaining iron and manganese. During this process, a small dose of chemical oxidant [sodium hypochlorite (NaOCl) or potassium permanganate (KMnO4)] will be added to enhance the kinetics of the reaction under all surface conditions, such as seasonal variations. (DEIR, p. 3-17.) The first step in the WTP process is filtration through natural, mined manganese dioxide (MnO_2) media. (DEIR, p. 3-17.) The Project applicant chose MnO_2 as the primary form of treatment due to its efficient removal characteristics for iron and manganese. (DEIR, p. 3-17.) Based on the groundwater quality conditions identified above, this treatment process is sufficient to meet State discharge standards. (DEIR, p. 3-17.) However, the WTP design calls for an additional level of treatment using granular activated carbon (GAC) in the event that water quality worsens during periods of active mining. (DEIR, p. 3-17.)

The proposed treatment process will also reduce concentrations of arsenic and ammonia, both of which have been detected at low concentrations in surface seeps near the mine. (DEIR, p. 3-17.)

Arsenic is not present in levels above water quality goals in the Brunswick Shaft samples but exceeds water quality goals in the mine drains. Once mine dewatering commences the flow of water through the mine workings would be reversed from its current condition with water pumped up the New Brunswick shaft rather than the current mine drains. The elevated arsenic levels in the drain versus the New Brunswick shaft have been noted in the DEIR. (DEIR, p. 4.8-21.) Oxidized arsenic will be adsorbed by precipitated iron and then adsorbed by the MnO_2 filter media. The low concentrations of ammonia (NH3) will be removed by the aeration process occurring in the pond. (DEIR, p. 3-17.) As a contingency, sodium hydroxide, commonly used in water quality treatment processes to adjust pH, will be included in the State permitting efforts for the WTP should it become necessary to treat NH3 in higher concentrations than have been previously detected. (DEIR, p. 3-17.) This may occur as a result of explosives used during periods of active mining.

After the water treatment process, water will be stored in a finish water tank and will constitute the final effluent before discharge to South Fork Wolf Creek. (DEIR, p. 3-18.) The water contained in the finish tank will be pH adjusted to meet regulatory compliance standards. (DEIR, p. 3-18.) The project applicant will achieve this by adding a small amount of sulfuric acid (commonly used in municipal treatment systems) to treat the effluent as necessary. (DEIR, p. 3-18.) At the conclusion of the water treatment process, any water discharged to South Fork Wolf Creek will meet or exceed applicable water quality objectives.

Water Quality in South Fork Wolf Creek

Contrary to some commenters' statements, any discharged treated water from the Project will exceed the water quality levels currently found in South Fork Wolf Creek. South Fork Wolf Creek is a heavily disturbed watershed and has been altered by historical land uses, including logging, hard rock and placer mining, agriculture, and construction and maintenance of road and railroad transportation networks. (Balance Hydrologics, 2020, pp. 8-9, 39.) South Fork Wolf Creek is a perennial stream that begins at a 48-inch culvert fed by surface drainage and road runoff from both the east and west sides of Brunswick Road. (DEIR, p. 4.4-3.) Samples from the creek taken in December 2018 and April 2019 detected elevated levels of iron and manganese. (DEIR, p. 4.8-23.) South Fork Wolf Creek flows west and empties into Wolf Creek, which itself is heavily disturbed and has historically included upstream discharges, such as that from the City of Grass Valley Wastewater Treatment Plant.[23] The Project will treat the groundwater currently existing in the mine to remove iron, manganese, and other elements to a level that meets or exceeds drinking water quality. The result will be that any water discharged to South Fork Wolf Creek will exceed the water quality levels currently existing within the creek, thus having a positive environmental effect on the creek, downstream users, and habitat.[24]

[23] Waste Discharge Requirements for the City of Grass Valley Wastewater Treatment Plant, Nevada County, CVRWQCB Order No. R5-2016-0012 (NPDES No. CA0079898), available at https://www.waterboards.ca.gov/rwqcb5/board_decisions/adopted_orders/nevada/r5-2016-0012.pdf.

[24] For example, surface water samples taken from South Fork Wolf Creek in April 2019 contained iron ranging from 310 µg/L to 940 µg/L and manganese ranging from 57 µg/L to 140 µg/L, depending on the location of the sample. (DEIR, 4.8-23.) The Project's proposed WTP would treat groundwater pumped from the New Brunswick shaft to concentrations of iron and manganese below 300 µg/L and 50 µg/L, respectively, which meets the screening level and effluent limits for Receiving Waters with Municipal and Domestic Supply Beneficial Use. (DEIR, Table 4.8-2.)

Contrary to the assertions of some commenters, the DEIR contains voluminous baseline surface water quality data. The baseline surface water quality data are described within Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location.

Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a "qualifying rain event of 1.25 inches", and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR.

Further analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 to the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19 of Appendix K.2 to the DEIR, while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18 of Appendix K.2 to the DEIR. All the sampling described was considered as part of the evaluations conducted in the DEIR. However, future compliance with water quality standards, including parameters such as temperature, turbidity, pH, and dissolved oxygen, and also general chemistry and metals, will be based on comparison of the results from the upstream and downstream sample locations, while treated water discharge to South Fork Wolf Creek is actually taking place, and not on current baseline conditions. While the baseline sampling that has been conducted for the Project informs the analysis of potential impacts in the DEIR, it would not be relevant for future compliance once dewatering, water treatment, and discharge begin. The compliance sampling requirements would be defined in the Monitoring and Reporting Program for the NPDES permit to be issued by the Regional Water Quality Control Board.

Regulatory Requirements

The Project applicant is undertaking extensive water treatment procedures before discharging any effluent into South Fork Wolf Creek in conformance with all legal requirements. Any discharge to South Fork Wolf Creek that does not meet certain water quality standards is prohibited by law. The state Porter-Cologne Water Quality Control act authorizes the CVRWQCB to implement certain water quality control measures. (DEIR, p. 4.8-28.) These measures are known as water quality control plans (also referred to as basin plans) for specific groundwater and surface water basins. (DEIR, p. 4.8-28.) The CVRWQCB is responsible for issuing permits that regulate activities such as stormwater, wastewater, industrial water discharge, and disturbance of wetlands. (DEIR, p. 4.8-28.) The Project applicant's discharge of treated water is expected to fall under the CVRWQCB's Limited General Threat Order (R5-2016-0076-01) as a "Tier 3" discharge. (DEIR, p. 4.8-28.) Such discharges to surface water that are greater than 250,000 gpd (greater than 175 gpm) and/or that are longer than four months are allowed if the water to be discharged

(with or without treatment) meets the applicable screening levels in the permit. (DEIR, p. 4.8-28.) To comply with this provision, the Project applicant will file a Notice of Intent (NOI) with the CVRWQCB for coverage under the Limited Threat Discharge permit, which will include a detailed description of the dewatering, treatment, and discharge components of the Project. (DEIR, p. 4.8-28.) The Project applicant will also be required to implement a Monitoring and Reporting Program to continuously monitor, sample, and report discharges as required by the Regional Board.

As the Project applicant will be legally required to meet certain water quality objectives, the applicant will determine whether the discharge from the Project to South Fork Wolf Creek will exceed the existing water quality levels of the surface water in the creek, based on water samples from the creek. Additionally, the Regional Board's permit will contain requirements that the project applicant continuously monitor and ensure that water quality objectives are met throughout the life cycle of the Project.

A Notice of Applicability (NOA) for the water discharge is required by Mitigation Measure 4.8-1(a). As stated in the mitigation measure, the owner shall be required to submit quarterly monitoring reports to the Regional Water Quality Control Board. General Order R-5-2016-0076 has been replaced with General Order R-5-2022-006 and the FEIR has been updated to reflect this change (see Chapter 3 of this Final EIR, Revisions to the DEIR Text). Upon receipt of the complete Notice of Intent (NOI), if the discharge is deemed eligible for coverage under the General Order, the CVRWQB will issue a Notice of Applicability (NOA). The NOI shall include evaluation of potential constituents of concern and demonstrate that WTP design shall successfully treat mine water to meet the water quality standards and treatment goals. The NOA will specify monitoring and reporting program requirements. All NPDES permits are required to specify requirements for recording and reporting monitoring results. General monitoring provisions of the General Order require that samples taken for the purpose of monitoring be representative of the monitored activity. Records of monitoring must be kept and maintained and reports to the CVRWCB quarterly. Any noncompliance which may endanger health or the environment must be reported orally within 24 hours from the time the Discharger becomes aware of the circumstances. A report shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances. If the discharge is not deemed eligible for coverage under the General Order, the mine operator would need to apply for project-specific waste discharge requirements to achieve water quality that meets applicable water quality standards; however, it is expected that the discharge will qualify for coverage under the General Order based on the available industry standard methods to reduce iron and manganese (and potentially ammonia and arsenic) and the existing use of the General Order for the nearby Empire Mine and North Star Mine water discharge.

A standard provision in the NOA is the duty to comply with all of the terms, requirements, and conditions of the General Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; denial of a permit renewal application; or a combination thereof.

There are currently two other permitted discharges downstream of the Project under the same General Order. The Empire Mine State Park discharges to South Fork Wolf Creek and the North Star Water Treatment Facility discharges to Wolf Creek.

Conclusion

As discussed in this master response and the DEIR (Chapter 4.8, Hydrology and Water Quality), the Project will construct an on-site water treatment plant that will be designed and permitted by the CVRWQCB to treat groundwater pumped from the mine to drinking water quality standards. The Project will only discharge treated groundwater to South Fork Wolf Creek. Thus, the DEIR appropriately concludes (DEIR, p. 4.8-52) that, after implementation of mitigation, the Project would result in a less than significant impact to the water quality of South Fork Wolf Creek.

References

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01/r5-2016-0076_noas/r5-2016-0076-005_amend.pdf
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01/r5-2016-0076_noas/r5-2016-0076-001_noa.pdf

Master Response 36 - Flows in South Fork Wolf Creek

Comments

Several commenters expressed concern for potential biological impacts resulting from dewatering the Project and the associated discharge to South Fork Wolf Creek. These concerns included water quality, erosion, and increased flows and how these changes may impact a variety of species that use this habitat area.

Discussion

As discussed in the Project Description of the DEIR and summarized in Master Response 35, groundwater exists within the underground workings of the Project site and would be pumped out of the New Brunswick shaft into an existing clay-lined settling pond. From the clay-lined settling pond, the water will then be moved through an on-site water treatment system to meet or exceed applicable water quality objectives and then be discharged to South Fork Wolf Creek. (DEIR, p. 3-18.) Any discharge of water to South Fork Wolf Creek will be performed under a discharge permit from the Central Valley Regional Water Quality Control Board (CVRWQCB), with required monitoring and reporting, to ensure that discharge water meets all applicable water quality standards. (DEIR, p. 4.8-28.) Water will be discharged to South Fork Wolf Creek at a maximum rate of 5.6 cubic feet per second (cfs) or 2,500 gallons per minute (gpm) during the approximately 6 months of initial dewatering of the mine. After initial dewatering, groundwater is anticipated to continue to infiltrate the underground workings at a rate of approximately 1.9 cfs (850 gpm) once initial dewatering is complete and will require an ongoing dewatering program.

Water Quality and Erosion

The DEIR Hydrology section (DEIR Chapter 4.8) and associated technical studies (Appendix K) addressed potential impacts to the South Fork Wolf Creek stream channel that may result from discharge of treated water, including water quality and erosion. Groundwater from the underground mine workings will be pumped to the settling pond for water storage and removal of total suspended solids and iron and manganese (through an aeriation system), then to an on-site water treatment system for filtration for removal of remaining iron and manganese. (DEIR, p. 3-17.) The proposed treatment process will also reduce concentrations of arsenic and ammonia, both of which have been detected at low concentrations in surface seeps near the mine. (DEIR, p. 3-17.) At the conclusion of water treatment, water discharged to South Fork Wolf Creek will exceed the water quality levels currently existing within the creek. As a result, biological species that may utilize South Fork Wolf Creek will experience an improvement in overall water quality.

Analysis of Potential Impacts to Species

As discussed above, for approximately 6 months during initial dewatering, water will be discharged to South Fork Wolf Creek at a rate of approximately 5.6 cfs and then reduced to approximately 1.9 cfs at the conclusion of this period for ongoing dewatering. The DEIR Hydrology section (DEIR Chapter 4.8) and associated technical studies (Appendix K) assumed the maximum discharge rate of 5.6 cfs to assess potential impacts from treated water discharge. Impact 4.4-2 addressed potential treated mine water discharge impacts to biological species, including fish, amphibians, invertebrates, and benthic macroinvertebrates (BMI) and concluded this impact would not be significant. As explained in Impact 4.4-2, and detailed in Chapter 4.8 and Appendix K.1, the proposed project will discharge a maximum of 5.6 cubic feet per second (cfs) of treated mine water to South Fork Wolf Creek. Base flow in South Fork Wolf Creek may range from 0.17 cfs in the summer to 6.5 cfs in the winter between storm events. Sediment pebble count analysis (see Appendix K.1) indicates that the flow rate at which sediment within the channel may become mobilized ranges from 20 cfs to 90 cfs. With the addition of the maximum proposed discharge of 5.6 cfs and increasing measured baseflows by a 50 percent safety factor, post-project baseflows during non-storm periods would be expected to range between approximately 5.8 cfs and 15 cfs. These estimates are less than 23 cfs, the threshold for bedload sediment mobility and well below flows that commonly exhibit significant work on the channel (i.e., 1- to 2-year flood).

Conclusion

The DEIR therefore concludes potential downstream water quality and erosion impacts to the stream channel and associated riparian zone along both sides of South Fork Wolf Creek from the additional discharge of 5.6 cfs would be minimal on sensitive biological resources, and do not represent a significant impact to the stream channel or associated riparian zone within South Fork Wolf Creek.

Master Response 37 - Birds and Raptors

Comments

Several comment letters asserted that the DEIR did not evaluate certain protected bird species having the potential to occur in the project area and mischaracterized the California black rail. The bird species that the commenters allege are not evaluated in the DEIR include willow flycatcher, olive-sided flycatcher, yellow-breasted chat, yellow warbler, and California spotted owl. Many commenters also allege that the bird surveys performed for the Project were not appropriately timed.

Discussion

The Project site was studied for special-status and protected birds, and raptors as part of the Biological Reconnaissance Surveys (BRA) conducted in 2018 and 2019. These surveys were conducted to determine whether special-status species protected under the federal Endangered Species Act (ESA), California Endangered Species Act (CESA), or the Migratory Bird Treaty Act, are present or have the potential to be present on-site due to suitable habitat. Reconnaissance level biological resources field surveys were conducted on foot for the Brunswick Site and Centennial Site on December 9th through 12th and 17th and 18th, 2018. Follow-up reconnaissance level biological resources field surveys were conducted for potential special-status wildlife species habitats on December 30th, 2018 for both sites. Reconnaissance-level wildlife surveys were conducted on July 10th and 14th, 2019 for the Centennial Site and July 14th and 16th, 2019 for the Brunswick Site, to document the presence and/or suitable habitat for special-status wildlife species.

As summarized in DEIR section 4.4.2 and Appendix F, only two special-status bird species have the potential to occur onsite: Cooper's hawk and California black rail. None of these species were identified during the BRA site visits and are considered to have a low potential to occur within the Project site except for Cooper's hawk, which has a moderate potential to occur within the project site. In addition, the DEIR and Appendix F, identified the potential for nesting raptors and other migratory bird species to occur within the Project site.

Impact 4.4-2 in the DEIR addressed potential impacts to California black rail and non-special status birds protected by other laws (e.g., Migratory Bird Treaty Act). As detailed in Impact 4.4-2, the potential for California black rail to occur onsite is low. Despite this low potential for onsite occurrence, the DEIR conservatively concluded that the Project would cause a potential impact to this species and therefore the DEIR required mitigation. The potential for non-special status birds and raptors on-site is high and considered a potentially significant impact, which also includes the potential for Cooper's hawk to occur and nest within the Project site. Mitigation measures for potential impacts to all bird and raptor species require pre-construction surveys prior to surface disturbance and avoidance and minimization measures if any of these species are identified during the preconstruction survey. These mitigation measures reduce the impact to a less than significant level. Note that the DEIR reflected that California black rail is California Threatened, but it is also considered California Fully Protected. Even though no new impact has been identified, the DEIR has been amended to reflect the Fully Protected status for this species (see Chapter 3 of this Final EIR, Revisions to the Draft EIR Text). Additionally, Mitigation Measure 4.4-2(d) has been amended to remove reference to an ITP being obtained for take of California black rail. As this species is considered to have a very low potential to be found on-site, surveys will be conducted prior to site disturbance, and consultation with CDFW and avoidance shall be required in the case of species presence, this impact is still considered less than significant.

Riparian Bird Species

A more recent CNDDB search was conducted in May 2022 and identified a recently reported occurrence of the yellow-breasted chat within the 5-mile search radius of the Project site. According to the California Department of Fish and Wildlife CNDDB Occurrence Report, the yellow-breasted chat was observed July 2021 within the 5-mile search radius of the Project site. Only the yellow-breasted chat and California spotted owl (see below) has been mapped in the CNDDB within 5 miles of the Project site. The yellow-breasted chat occurrence was mapped along the South Fork Wolf Creek, approximately 1.5 miles downstream of the Brunswick culvert outlet where South Fork Wolf Creek daylights within the Brunswick Site. The yellow-breasted chat is a CDFW Species of Special Concern and is not State or federally listed. This species CNDDB mapped location is within the Empire Mine State Historic Park and within an area referred to as the Bennett Street Grasslands. This species was not identified within any of the Project areas during surveys conducted between December 2018 and August 2020.

If the yellow-breasted chat were to be found on-site, it would most likely be found within the riparian areas of the Project site. As discussed above, nesting raptors and other migratory bird species were analyzed and identified as a potential impact. Mitigation Measure 4.4-2(g) requires a pre-construction survey for bird species prior to surface disturbance and avoidance and minimization measures in the event a species is identified. Therefore, the potential impact to this species has been analyzed and addressed in the DEIR. Nevertheless, for clarity, this Final EIR includes revisions to Chapter 4.4, Biological Resources, to include discussion of yellow-breasted chat and other riparian bird species discussed below, and as shown below, targeted revisions have been made to Mitigation Measure 4.4-2(g) to reference this species. Willow flycatcher, olive-sided flycatcher, and yellow warbler have not been mapped within the CNDDB within 5 miles of the Project site. However, an updated CNDDB 9 Quad Species List review of the Project site

within the Grass Valley Quad being the central quad in the 9 Quad Species review does list those three species as "unprocessed" under data status. The CNDDB 9 Quad Species List was generated on April 20, 2022. Per CDFW, "unprocessed CNDDB data is data that has been submitted to the CNDDB but has not yet been entered into the CNDDB occurrence database and GIS. A bibliographic record has been created for this data with quad and county information, but a thorough review of the information has not yet been conducted. Unprocessed records should be used with caution as they have not been quality controlled. These data will eventually be reviewed by a CNDDB Program biologist and incorporated into the CNDDB occurrence database and GIS if appropriate." These species are most likely to occur within riparian areas where quality habitat for these species occurs. Habitat for these species within the Project site is considered limited given the level of disturbance within the Project site. More developed and less disturbed riparian habitat is located outside of the Project site along South Fork Wolf Creek within the Bennett Street Grasslands where the yellow-breasted chat is mapped within the CNDDB. The riparian habitat within the Centennial and Brunswick Industrial Sites provides minimal suitable habitat for any of these species given the level of disturbance historically within those areas as well as the recent disturbance within both areas in 2021 related to a fire that burned a large area within the Centennial Area and a large storm in late December 2021 that heavily impacted the riparian habitat along the South Fork Wolf Creek within the Brunswick Area. These species were not identified within the Project site during surveys conducted between December 2018 and August 2020. Accordingly, these species have a low probability of occurrence on-site, and no potential impact is expected. In addition, as discussed above, nesting raptors and other migratory bird species were analyzed and identified as a potential impact and mitigation is required for these potential impacts in the DEIR. Although no new impact has been identified, for clarification purposes, Mitigation Measure 4.4-2(g) is hereby revised in this Final EIR (as shown below) to include, by name, the above-discussed riparian bird species.

California Spotted Owl

In response to several public comments about the known presence of California spotted owl within Empire Mine State Park, and information available on the Biogeographic Information and Observation System (BIOS) managed by CDFW, the Final EIR includes specific discussion of the California spotted owl (CSO) species (see Chapter 3 of this Final EIR, Revisions to the DEIR Text). The California spotted owl is not listed as threatened or endangered in the federal Endangered Species Act (ESA) or the California State Endangered Species Act (CESA) but is rather referred to as a Species of Special Concern by CDFW, which do not require take permits for incidental take, but do require analysis under CEQA. The DEIR acknowledges that raptor nests and eggs are protected by Section 3503.5 of the California FGC, which states, "It is unlawful to take, possess, or destroy any birds in the order *Falconiformes* or *Strigiformes* (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the code or any regulation adopted pursuant thereto." Notably, the DEIR also acknowledged that the Brunswick Site has suitable habitat for raptors (owls are a type of raptor) and included mitigation specifically for raptor and nesting bird species. (see Mitigation Measure 4.4-2(g).)

As identified in the BIOS database, a CSO nest was documented within the Brunswick Area in 2011. Three additional follow up surveys in 2012, 2016 and 2018 did not document the presence of a nest but did document the presence of a pair of CSO (in 2012 and 2016) and a single male CSO in 2018. Based on the information from BIOS, and to clarify the analysis provided in the DEIR on impacts to raptors, two surveys for presence and nesting status of California spotted owl were conducted by a qualified biologist pursuant to the United States Forest Service (USFS) protocol (1992) on the Brunswick Site. California spotted owl callback surveys were conducted at two locations within the Brunswick Area on August 5, 2022 and then again on August 11, 2022. No

CSO responded to any of the calls from either survey station either night (Please see Appendix I to this Final EIR for the Technical Memorandum for the Idaho-Maryland Mine Project – Brunswick Area California Spotted Owl Surveys and Assessment, August 2022).

Given the information obtained via BIOS 6, identifying four previous sightings of CSO on the Brunswick Site, Table 4.4-6 in the DEIR has been updated in Section 4.4 of the FEIR to include California spotted owl by name, and to indicate that the potential for CSO nesting onsite is Moderate, while potential for presence of transitory CSO onsite is High (please see Response to Comment Grp 31-10 and Chapter 3 of this Final EIR, Revisions to the Draft EIR Text). Although CSO was seen on-site most recently in 2018, it was a single male bird, not a nest or breeding pair; thus, it would not be protected by the Fish & Game Code's prohibition of disturbing eggs or nests. A nest has not been seen on-site since 2011. Further, the two protocol surveys conducted in 2022 did not identify any CSO on-site.

Although no new impact has been identified, Mitigation Measure 4.4-2(g) has been amended as shown below. In addition, for clarification purposes, Mitigation Measure 4.4-2(g) is hereby revised in this Final EIR to include, by name, the above-discussed riparian bird species:

~~Non-Special Status Raptors and Migratory~~ Nesting Birds

4.4-2(g) *Pre-construction Survey and Avoidance and Minimization Measures. Prior to initiation of ground-disturbing activities for any phase of project construction, if construction is expected to occur during the raptor nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal, including one daytime survey and one nighttime survey targeted at California spotted owl, consistent with the USFWS (1992) California spotted owl survey protocol. The pre-construction survey shall be conducted within 7 days prior to commencement of ground-disturbing activities. The survey shall be conducted within all areas of proposed disturbance and all accessible areas within 250 feet of proposed disturbance. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required. Removal of any trees within the Brunswick Area would occur between September 1st and January 31st to ensure that no nesting birds, raptors, or owls would be impacted by the proposed IMM project.*

If any active nests are located within the proposed disturbance area, including active nests within riparian habitat for the yellow-breasted chat, willow flycatcher, yellow warbler, and olive-sided flycatcher, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically 100 feet for migratory bird nests and 500 feet for raptor nests. If active nests are found within the disturbance footprint, a qualified biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical and/or the willow flycatcher, a State listed species, is documented nesting during the pre-construction surveys for nesting birds. Additionally, an ITP could be required by CDFW if complete avoidance of willow flycatcher is

> *not feasible. If construction activities cause the nesting bird(s) to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased, as determined by the qualified biologist, such that activities are far enough from the nest to stop the agitated behavior. The exclusionary buffer shall remain in place until the young have fledged or as otherwise determined by a qualified biologist.*

Per CDFW, an analysis of project level impacts to Species of Special Concern typically includes analysis of "population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features." Population-level and regional effects to CSO are not expected, given that CSO prefer older, closed canopy forests and forages for prey that require woody debris and understory vegetation for cover, and the Project site does not include this optimal type of CSO habitat. Further, the 18.7 acres of trees being removed from the Brunswick Site are a very small proportion of the range of a single CSO, which can range from 946 to 1,520 acres in the Tahoe National Forest (see Roberts 2017), and an even smaller percentage of the overall range of CSO species along the western slope of the Sierra Nevada, in the southern Coast Ranges from Monterey County to Santa Barbara County, and in the Traverse and Peninsular Ranges from southern California to Baja California. Moreover, while 18.7 acres of trees will be removed from the Brunswick Area, the impacts to overall habitat features are considered minimal, given that the Project sites do not include optimal CSO habitat, and the provided mitigation measure will ensure protection for any nesting pairs. The Centennial Site has younger trees than the Brunswick Site and does not contain suitable habitat for CSO. As such, given the negative results from recent surveys and the time that has passed since a prior nest sighting in 2011, the DEIR's conclusion that a less than significant impact to raptors and nesting birds (including CSO) would occur with implementation of mitigation remains appropriate.

Timing of Bird Surveys

Some commenters asserted that wildlife surveys were not conducted at the appropriate time of year, and not in conformance with CDFG or USFWS protocols. However, protocol-level surveys are not required for CEQA analysis. Moreover, many surveys were conducted during the appropriate time of year, as set forth in relevant survey protocols, to detect presence of the relevant wildlife species. As an example, the 2003 CDFW protocol for willow flycatcher calls for a survey during the period of June 15 to June 25, and a second survey either between June 1 and June 14, or between June 26 and July 15. Reconnaissance surveys were conducted at both sites on July 14th, which is within one of the protocol survey windows, even though protocol level surveys are not required. Moreover, Mitigation Measure 4.4-2(g) requires pre-construction surveys for willow flycatcher, which will ensure that impacts to willow flycatcher nests are avoided.

While the reconnaissance level surveys conducted on July 10th and 14th 2019 for the Centennial Site and July 14th and 16th for the Brunswick Site may not fall within the survey protocol recommended windows for all species, protocol-level surveys are not required for CEQA analysis. Rather, the survey results along with review of CNDDB records and appropriate mitigation measures including pre-construction surveys was relied on to appropriately reach the conclusion that impacts to wildlife species is less than significant after mitigation. As protocol-level surveys are not required, and the DEIR requires pre-construction surveys, the selected survey dates are appropriate for purposes of CEQA analysis.

Conclusion

This master response confirms that the DEIR identifies the Project could result in a significant impact to nesting raptors and other migratory bird species, and thus, includes Mitigation Measure

4.4-2(g) requiring a pre-construction survey for nesting raptors and migratory bird species prior to surface disturbance and avoidance and minimization measures in the event a species is identified. Thus, no new significant impact has been identified and the mitigation in the DEIR is protective of the bird species identified by the commenters as being missed in the DEIR. Nevertheless, for clarity, Mitigation Measure 4.4-2(g) has been revised to reference the species identified by the commenters, including yellow-breasted chat, willow flycatcher, yellow warbler, and olive-sided flycatcher and California spotted owl, and provide additional details regarding survey methodology.

Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog

Comments

Several commenters asserted that the DEIR incorrectly concluded that foothill yellow-legged frog and California red-legged frog have a very low potential to occur within the Centennial and Brunswick Sites (i.e., Project site). Many commenters also claimed that the visual encounter surveys performed for foothill yellow-legged frog was not conducted during the optimal time of year.

Discussion

As explained in Master Response 30 (Biological Study Technical Adequacy), significant technical study was undertaken of the Project site, including review of site conditions for special-status amphibians. As part of the Biological Resources Assessment (BRA), the site was surveyed and analyzed for potential California Red-Legged Frog (CRLF) and Foothill Yellow-Legged Frog (FYLF) habitat. The BRA did not identify FYLF or CRLF on-site and found that only marginal habitat existed for these species on the Project site. This analysis, and its conclusions, were peer reviewed by the County's biological consultant and summarized in DEIR section 4.4.2 and Impact 4.4-2.

DEIR section 4.4.2 and Impact 4.4-2 explain that neither CRLF or FYLF have been previously identified within the Wolf Creek watersheds and the likelihood of either of these species being present within the project areas was considered very low (see DEIR Table 4.4-6).

Regarding the CRLF, no Designated Critical Habitat (DCH) has been mapped for CRLF on the project site and the species has not been identified within 5 miles of the project site. CRLF require suitable breeding locations be located within 1.25 miles of each other and connected by barrier-free dispersal habitat that is at least 300 feet in width (USFWS Region 1 CRLF Recovery Plan dated May 28, 2002). It is unknown whether suitable breeding locations are located within 1.25 miles of the project site; however, the areas surrounding the project site contain busy roads, industrial, commercial, and residential development, and the ponds within the project site do not connect with barrier-free dispersal habitat that is a minimum of 300 feet wide. Additionally, given that CRLF have not been identified in the Grass Valley USGS Quadrangle, the watershed associated with the project area, or within 5 miles of the Brunswick Site, the potential for this species to occur is considered very low.

Despite the very low likelihood CRLF may be present on-site, the DEIR conservatively concluded a potential impact could occur and required preconstruction surveys for CRLF. With the implementation of this mitigation measure, the CRLF would be avoided and fully mitigated. Furthermore, given the impacts to Clean Water Act regulated "waters of the U.S.," including wetlands, a Section 7 consultation with the USFWS will be required. The pre-construction surveys and monitoring outlined within the DEIR for CRLF are comprehensive and provide measures to



further minimize potential impacts to CRLF. In addition, the pre-construction survey and monitoring methodologies would follow the recommendations made by the USFWS as part of any Section 7 consultation process for this species.

There are several occurrences of FYLF within 5 miles of the project site. The nearest occurrence of FYLF is located along Deer Creek, approximately 3 miles north of the Centennial Site. The occurrence consists of a single FYLF observed in Deer Creek in 1903 and the species is considered extirpated from Deer Creek (CNDDB 2022). The nearest FYLF occurrence to the Brunswick Site is located approximately 3 miles to the east/southeast in Greenhorn Creek. This occurrence is considered extant.

Visual Encounter Surveys (VES) for FYLF were conducted August 29, 2019 within South Fork Wolf Creek. The FYLF VES surveys were conducted during the periods identified by CDFW as the most accurate for detecting species presence, per the CDFW Considerations for Conserving the FYLF document (dated May 14, 2018). As stated within the CDFW document, "current scientific literature suggests surveys for presence will be most accurate if conducted during and immediately following the breeding season (spring-summer)" and they recommended VES methods to be employed to determine an accurate survey result for the species. In addition, following release of the DEIR, additional FYLF VES surveys were conducted on June 8th and June 15th 2022 (see Appendix J to this Final EIR for a survey memo). The June 2022 VES surveys did not identify FYLF and confirmed marginal suitable habitat as explained in the DEIR and summarized below. The additional FYLF VES surveys conducted in June 2022 included surveys within three survey stretches similar to the survey locations conducted in August 2019 for FYLF; however, the June 2022 FYLF surveys included the entire stretch of South Fork Wolf Creek within the Bennett Street Grasslands and where 2 of the 3 electrofishing locations surveyed by CDFW on March 8, 2022 are located.

In its comment letter (see Agency Letter 3 of this Final EIR), CDFW suggested additional surveys under the CDFW Considerations for Conserving the FYLF document, but acknowledged that no approved survey protocols exist for FYLF. CDFW noted that surveys in the late summer are often the easiest method to determine presence, and that to increase likelihood of detection, surveys should include one VES in April-June. The applicant already conducted a survey in June and then one in August, so the applicant has already complied with most of what CDFW is suggesting – even though what it is suggesting is not mandatory. The surveys conducted are sufficient to detect presence for CEQA purposes, and protocol level surveys (such as the suggested survey schedule in the CDFW Considerations for Conserving the FYLF) are not required for CEQA. Moreover, Mitigation Measure 4.4-2(a) requires pre-construction surveys that would detect species presence prior to disturbance, to ensure avoidance of impacts to this species.

The CDFW electrofishing surveys identified two non-native fish species (brown trout and bluegill) and no additional fish or amphibian species during the survey. CDFW concluded that the two survey locations furthest away from the Brunswick Site had the greatest densities of fish with better health conditions than the survey location located closest to the Brunswick Site.

As summarized in DEIR Impact 4.4-2 and Appendix F, FYLF was not identified within South Fork Wolf Creek from the outlet of South Fork Wolf Creek within the Brunswick project area during the summer 2019 VES surveys conducted. As discussed above, the species has not been previously identified within the Wolf Creek watershed and was not identified within South Fork Wolf Creek during FYLF VES surveys implemented in August 2020 and June 2022. These surveys were conducted by two qualified biologists with extensive experience conducting amphibian and FYLF VES surveys. In addition, the area near the project site only includes marginal suitable habitat for

the species downstream towards the City of Grass Valley within a small area of the Empire Mine State Historic Park and, as a result, the species has a very low likelihood of being present within South Fork Wolf Creek or the Wolf Creek watershed, given the lack of suitable habitat for the species, except for a very small stretch of the creek between the Brunswick Site and the City of Grass Valley. Suitable habitat is lacking due to the high levels of current and historical disturbance within South Fork Wolf Creek within and downstream of the Brunswick Site. Despite this low likelihood of potential occurrence, the DEIR concluded a significant impact to FYLF habitat may occur and provided Mitigation Measure 4.4-2(a) requiring pre-construction VES surveys (following the CDFW 2018 Considerations for Conserving the FYLF) prior to any proposed disturbance and changes in discharges within South Fork Wolf Creek. Implementation of this mitigation measure reduces the potential impact to a less than significant level, if FYLF were to be documented within South Fork Wolf Creek during the implementation of the pre-construction VES surveys for FYLF.

Conclusion

Based on extensive scientific investigation (e.g., literature review, site surveys), the DEIR appropriately concluded that there is a very low likelihood for CRLF and FYLF to occur on the Centennial and Brunswick Sites. Nevertheless, out of an abundance of caution, the DEIR conservatively concluded the project could have a significant impact to these species, and thus, included Mitigation Measures 4.4-2(a) (FYLF) and 4.4-2(c) (CRLF) setting forth avoidance and minimization measures to ensure protection of the species.

References

USFWS. 2002. Recovery Plan for the Red-legged Frog (*Rana aurora draytonii*). Region 1 Portland, Oregon. May 28, 2002.

2.3 RESPONSES TO COMMENTS

Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. As noted above, for efficiency and clarity, the comment letters have been organized into 10 distinct categories: Agency Letters; Group Letters; Form Letter A; Form Letter B; Form Letter C; Form Letter D; Support Cards; Individual Letters; Late Letters; and DEIR Meeting. Therefore, the letter number will correspond to the category (i.e., the first agency letter would be numbered Agency Letter 1), and the first comment in Agency Letter 1 would have the following format: Agcy 1-1. For further example and clarification, the first comment in Group Letter 1 would be numbered Grp 1-1; the first comment in Form Letter A 1 would be A 1-1; the first comment in Form Letter B 1 would be B 1-1; the first comment in Form Letter C 1 would be C 1-1; the first comment in Form Letter D would be D 1-1; the first comment in Support Card 1 would be Sup 1-1; the first comment in Individual Letter 1 would be Ind 1-1; the first comment in Late Letter 1 would be Lt 1-1; and the first comment in the DEIR Meeting transcript would be Meet-1. The response to each comment references the comment number.

Similar to the Master Responses above, the responses to the comment letters amplify or clarify information provided in the DEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Where revisions to the DEIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final EIR. All new text is shown as <u>double underlined</u> and deleted text is shown as ~~struck through~~.

As stated above, the changes to the analysis contained in the DEIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with

CEQA Guidelines, Section 15088.5, recirculation of the DEIR is not required, as discussed in detail in Chapter 1 of this Final EIR.

Agency Letter 1

State of California • Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
P.O. Box 942896 • Sacramento, CA 94296-0001

Gavin Newsom, *Governor*
Armando Quintero, *Director*

March 30, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
matt.kelley@co.nevada.ca.us

Subject: Draft Environmental Impact Report for the Idaho-Maryland Mine Project, State Clearinghouse # 2020070378

Dear Mr. Kelley,

The California Department of Parks and Recreation, or California State Parks (CSP), as it is familiarly called, welcomes the opportunity to comment on the Draft Environmental Impact Report, State Clearinghouse #2020070378 for the proposed Idaho-Maryland Mine Project. CDPR is a State Agency as defined by the California Environmental Quality Act (CEQA) § 21082.1, and a Trustee Agency as used by CEQA, its Guidelines, and as defined by CCR § 15386 for the resources affected by this project within a unit of the State Park System.

The mission statement and the Department Operations Manual directs CDPR to: preserve and protect biodiversity and fully functioning natural ecosystems; provide for the health and safety of the public (park visitors, park employees, and park residents); create and maintain outdoor recreation opportunities for residents and visitors of California; and protect cultural resources (http://www.parks.ca.gov/?page_id=91). The following comments reflect the internal policies and directives of CDPR as they relate to the Draft Environmental Impact Report for the Idaho-Maryland Mine Project (the Project).

Agcy 1-1

CDPR owns and operates Empire Mine State Historic Park (the Park) in Grass Valley, CA. The Park hosts over 100,000 visitors annually, of which at least 50,000 use the vast trail system. Empire Mine SHP is located nearby to both the Brunswick and the Centennial Project sites of the Idaho Maryland Mine. The northwest boundary of the Union Hill area of the Park is just 450 feet to the southwest of the Brunswick facility project boundary, and the Upper Union Hill Trail Loop is located 850 feet away. The main processing areas at Brunswick are less than 0.5 miles away from a large area of Union Hill, including trails and valuable wildlife habitat.

The Park contains the "Bennett Street Grasslands," which are located along East Bennett Road, a 33-acre assemblage of dense riparian areas, wetlands, and unique, low elevation wet and dry grassland communities. The Bennett Street Grasslands contain a 0.45-mile stretch of South Fork Wolf Creek. The Bennett Street Grasslands provide important breeding, wintering, and fall migration habitat for birds. Over 80 species have been detected at the site; this includes the banding and capture of the Willow Flycatcher, *Empidonax traillii* (California State Endangered Species), the yellow breasted chat, *Icteria virens* (California Bird Species of Special Concern), and detections of Olive-sided Flycatcher, *Contopus cooperi* (California State Bird Species of Special Concern) as well as, Yellow Warbler, *Setophaga petechia* (California State Bird Species of Special Concern), from 2019-2021.

The Bennett Street Grasslands and the South Fork Wolf Creek are also the site of a recently completed six-year mitigation project, the "Magenta Drain Mitigation" project which was a required mitigation from **Section A.8 of Streambed Alteration Agreement and Major Amendment No. 1600-2011-0009-R2**. The mitigation restored both wetland and riparian habitats along the South Fork Wolf Creek and included several local school groups planting native riparian vegetation along the banks of the creek.

The Bennett Street Grasslands hosts annual field trips for local 4th and 5th grade students. These students participate in active resource restoration and with the volunteer bird banding and inventory project taking place along the South Fork Wolf Creek. One such field trip was captured in the video "Bird Banding at Empire Mine State Historic Park" and featured in the 2019 Wild and Scenic Film Festival: https://youtu.be/3kJ68T92Flw. Bird banding is handled by Allison Nelson and Gold Country Avian Studies under a 7-acre conservation easement with the Bear Yuba Land Trust that is held at the Grasslands.

The Park also contains an additional portion of the South Fork Wolf Creek that is both upstream of the Bennett Street Grasslands, and downstream of the Brunswick facility, albeit much closer, familiarly called the "Upstream Reach". The "Upstream Reach" is 0.4 miles (2200 feet) downstream of Brunswick facility on South Fork Wolf Creek, 1470 feet south of the Centennial site, and holds 13 acres of valuable riparian habitat. CSP requests that it be noted that an undisturbed, historic "sulphurette works" currently located at this site.

General Comments:

Agcy 1-2

CSP has several significant concerns regarding the Draft Environmental Impact Report (DEIR), it's impacts, mitigations, and the Project as proposed within, as currently stated. Water quantity and quality, air quality, noise and vibration, hazardous materials, and wildfire dangers are all crucial issues for CSP, and we find the DEIR to be inadequate in mitigations, and several sections are unclear as to what the potential impacts may be. Cumulatively and individually, these potentially significant issues could negatively affect the natural resources, recreational values, health and safety of Park visitors and employees, and the general well-being of Empire Mine State Historic Park (SHP).

Water / Dewatering / Downstream Impacts

Agcy 1-3

Specifically, CSP believes the Project as well as it's impacts and mitigations fail to adequately protect the South Fork Wolf Creek, it's riparian ecosystem, and it's "Beneficial Uses." The proposal to add up to 5.6 cubic feet per second (cfs) of water from mine de-watering actions to this small fragile stream and associated riparian areas for the next 80 years, is of major concern. The South Fork Wolf Creek flows downstream from the Project through two stretches, totaling 0.64 linear miles owned by Empire Mine State Historic Park, one of which is only 0.4 miles (2200 feet) downstream of the Brunswick facility.

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CA Water Code § 13050 section (f) states: "'**Beneficial uses**' of the waters of the state that may be protected against quality degradation include … preservation and enhancement of fish, wildlife, and other aquatic resources or preserves". The Central Valley Regional Water Quality Control Board have established in their 2018, Sacramento and San Juaquin Basin Plan that "**Fish, plants, and other wildlife, as well as humans, use water beneficially"** (page 2-1, Beneficial Uses, California Regional Water Quality Control Board, Central Valley Region, (RWQCB), 2018), and that existing "Beneficial Uses" of the Bear River Watershed which includes South Fork Wolf Creek are "Wildlife Habitat" and "Cold and Warm Freshwater Habitat" (page 2-10, RWQCB).

CDPR believes the project proposal and DEIR conflict with Nevada County General Plan, Volume 1 Goals, Objectives, Policies, & Implementation Measures, Chapter 17: Mineral Management Element, Policy 17.11: "Recognize the importance of water conservation and quality for the present and future needs of the County by: 3. Requiring that any increase or decrease of off-site discharge **is not detrimental to the downstream environment or downstream water users**." The increase in off-site water discharge from the Project to South Fork Wolf Creek could be extremely detrimental to the downstream environment and water users, of which include wildlife and riparian trees.

Specifically, the proposal to add 1.9-5.6 cfs from the Project to the South Fork Wolf Creek threatens to drastically alter the immediate riparian ecosystem with unpredictable and fluctuating water levels at any season. This could lead to changes in existing riparian tree health, unknown alterations of adjacent plant communities (including recent native tree and shrub plantings), a decrease in benthic macroinvertebrate populations, erosion and degradation of bank stability, chances of increased heavy metals, increases in turbidity, and degradation of aquatic wildlife habitat, especially for amphibians.

Air Quality and Noise / Vibration Impacts

Agcy 1-4

While the DEIR has focused air quality, noise, and vibration impacts on surrounding residential areas, it has failed to mention the close proximity of Empire Mine SHP, and the potential hazards for its Park trail users and employees. The Park, the natural resources contained within and its recreational users, have been neglected to be considered a "**Sensitive Receptor**" regarding Air Quality and Noise impacts. The definition of *Sensitive Receptors* in *Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy, Page 4.3* neglects to include "parks and playgrounds," thereby failing to assess potential impacts to recreational users of the Park from air quality impacts. The popular Union Hill Trail Loop is just 850 feet away from the Brunswick facility and the Bennett Street Grasslands is only 900 feet south of the Centennial facility. The entire DEIR also fails to discuss how close Sensitive receptors should be to warrant analysis. Guidance from other reputable CEQA documents and air quality districts find a distance of at least 1000 feet or more when finding and analyzing Sensitive receptors.

An example of a more applicable "**Sensitive Receptors**" definition is from: *Hidden Falls Regional Park Trail Expansion Subsequent DEIR, Chapter 9, Air Quality (2020), Page 9-12*, https://www.placerair.org/DocumentCenter/View/42743/Chapter-9---Air-Quality-PDF):

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"9.2.4 SENSITIVE RECEPTORS Some land uses are considered more sensitive to air pollution than others, because of the types of population groups or activities involved. Children, pregnant women, the elderly, those with existing health conditions, and athletes or others who engage in frequent exercise are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered **sensitive receptors** include schools, daycare centers, **parks** and playgrounds, and medical facilities. Residential areas are considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to the pollutants present. **Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation."**

Agcy 1-5

Empire Mine SHP is mentioned twenty times in the complete DEIR, but with only one reference to the close proximity of the Park to the Project in *Chapter 4.11 – Public Services and Utilities*. *Chapter 4.4 – Biological Resources* mentions Empire Mine SHP only four times: Three occurrences stem from documentation of the Foothill Yellow Legged Frog survey under the *Reconnaissance Level Biological Resources Field Surveys* section when contract biologist Greg Matuzak surveyed an unknown section of South Fork Wolf Creek on Park property one time on August 29, 2019 (without Park knowledge or a valid State Scientific Collection Permit). Empire Mine SHP is not mentioned at any point during discussions of hydrological impacts due to mine de-watering even though CSP owns a large section of the free-flowing stretch of South Fork Wolf Creek downstream of the Project. The Park location and boundaries are also lacking from all maps within the DEIR, aside from *Figure 4.8-9, South Fork Wolf Creek Reaches in Project Vicinity*, which shows an older incorrect boundary of Empire Mine SHP from a USGS topo map. CSP sent in a comment letter for the Notice of Preparation for this DEIR and it is surprising and unfortunate that very few of our concerns were addressed.

Since discussions of the proximity of the Park to the Project are virtually non-existent in the DEIR, CSP would like to encourage remedying this mistake. Environmental review by Nevada County, State Agencies and the local community are entitled to know that Empire Mine SHP is a neighbor to this potential project and that any potential impacts would affect this important community resource. All relevant maps and documents need to discuss and display the close proximity of the Park with ownership by a State Agency focused on resource protection and outdoor recreation. These sections would include:

- 3.2 Project Location
- 3.5 Project Setting and Surrounding Land Uses
- 4.3 Air Quality and Greenhouse Gas Emissions
- 4.4 Biological Resources
- 4.7 Hazards and Hazardous Materials
- 4.8 Hydrology and Water Quality
- 4.10 Noise and Vibration
- 4.13 Wildfire

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Several maps are attached to these comments displaying location of Empire Mine SHP to both Project sites and relevant distances. Park boundaries can also be found on Page 8 of the Empire Mine State Historic Park brochure available here: https://www.parks.ca.gov/pages/499/files/EmpireMineSHPWebLayout2016.pdf

The health and safety of Park visitors and employees, the Park visitor experience, and the preservation of natural and cultural resources are of the utmost importance to California State Parks. The Project as proposed could have significant impacts on those resources and values.

If any of our comments need clarification, please do not hesitate to contact Parks Environmental Scientist Daniel Lubin at dan.lubin@parks.ca.gov or at (530) 272-0298.

Sincerely,

Daniel Lubin, Environmental Scientist
Sierra District of California State Parks

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Comments:

The following sections and bullet points detail CSP points of concerns with project components, impacts and mitigations from the Idaho-Maryland Mine Project Draft EIR Volume I (Draft EIR Chapters 1-8), and may include references to the Appendices:

Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy

Agcy 1-6

- *Sensitive Receptors, Page 4.3-11*

  The definition of "Sensitive Receptors" has omitted the important category of "Parks and Playgrounds" in this paragraph and in numerous following sub-sections, and in *Appendix E.1, Health Risk Assessment*. CSP requests that "Parks and Playgrounds" be added to this definition as a "Sensitive Receptor," especially considering the numerous air pollutants theorized to be generated by the Project, the proximity of Empire Mine State Historic Park, and the guidance found in many relevant CEQA documents. The *San Joaquin Valley Unified Air Pollution Control District Final Draft Guidance for Assessing and Mitigating Air Quality Impacts February 19, 2015* (page 10) (https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF) states:

  "Sensitive Receptors: People that have an increased sensitivity to air pollution or environmental contaminants. **Sensitive receptor locations include** schools, **parks** and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). **The location of sensitive receptors is needed to assess toxic impacts on public health**."

  The *CEQA Air Quality Handbook A GUIDE FOR ASSESSING THE AIR QUALITY IMPACTS FOR PROJECTS SUBJECT TO CEQA REVIEW (San Luis Obispo County Air Pollution Control District, April 2012, Page iv)* (https://www.prcity.com/DocumentCenter/View/14604/CEQA-Air-Quality-Handbook---2012-Volume-1-PDF) states:

  "Sensitive Receptors: Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. **Sensitive receptor locations** include schools, **parks** and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s). **The location of sensitive receptors is needed to assess toxic impacts on public health**."
  Hidden Falls Regional Park Trail Expansion Subsequent DEIR, Chapter 9, Air Quality (2020) states:

  "Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation."

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CSP agrees with Placer County's analysis about recognizing the importance of insuring protection for recreational trail users and park employees from air quality impacts. Empire Mine State Historic Park's boundary is 450 away from the Project's Brunswick facility's boundary, with many popular trails within 1000 feet.

- *Health Risk Assessment*
  - On *Page 4.3-61*: "The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced."
    - CSP appreciates knowing this information as this is of utmost concern for the health of the Park. Silica is mentioned 10 times within the DEIR, with many references to negative health consequences when inhaled. CSP can find no mention of threshold values for silica inhalation or estimated emissions within the DEIR. In *Appendix E.1 Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California*, silica emissions were found on *page 25* in *Table 10. Project Annual On-Site Operational TAC Emissions* which listed silica emissions of 4.32-4.42 tons per year for the operational phases of *Year 2022 to 2026 – Mining, Brunswick Industrial Site Operations, Fill Placement at Centennial Industrial Site* and *Year 2027 to 2032 – Mining, Brunswick Industrial Site Operations, Fill Placement at Brunswick Industrial Site*. Considering the amount of silica potentially emitted from the Project there is no reference of the threshold values that the California Office of Environmental Health Hazard Assessment (OEHHA) have established in the Adoption of Chronic Reference Exposure Levels for Silica (Crystalline, Respirable) *Feb 10, 2005*. CSP requests a transparent evaluation of how 4.32-4.42 tons per year of silica emissions from operational phases of the Project would correspond to the Inhalation Reference Exposure Level of 3 µg/m3 that OEHHA have established in the Adopted Chronic Reference Exposure Levels for Silica (Crystalline, Respirable), and in particular reference to the Park's users and employees as a *sensitive receptor*. Without this information CSP has found it impossible to evaluate this potential health impact.

Agcy 1-7

  - On *Page 4.3-62*: "Blasting and crushing would also result in emissions of heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium."
    - CSP appreciates knowing this information as this is of utmost concern for the health of the Park, employees, residents, and its visitors. CSP can find no relevant information on exact threshold values for each of the above state heavy metals and has found it impossible therefore to evaluate this potential impact to the Park's

Agcy 1-8

  - On *Page 4.3-62*: "However, it should be noted that mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber. The protections sufficient to meet the MSHA PELs would result in

Agcy 1-9

7

limiting the potential emissions of asbestos aboveground from the shaft in general."

- CSP believes this statement relies on a false pretense that following Mine Safety and Health Administration permissible exposure limits (PEL) for asbestos for individual mine workers during a shift will also "limit" asbestos emissions aboveground "in general." How are the PELs being achieved for mine workers and how does this relate to limiting asbestos being released into the aboveground environment? Asbestos pollution is of extreme concern for CSP, and we would like clarification on the above assumption.

Agcy 1-10

- On *Page 4.3-62*: "A dispersion modeling analysis was conducted for the HRA of DPM emitted from diesel vehicles and off-road equipment, blasting emissions, and TACs from fugitive dust sources on the project sites. A full list of emission sources and the parameters used to model each source may be found in the HRA included within Appendix E.1 to this EIR."
  - CSP has reviewed Appendix E.1 and the Health Risk Assessment included within and cannot find a discussion, map or table disclosing the locations(s) of where the actual dispersion of air pollutants would be transported to and from the Project sites, besides a "Wind Rose" graph from the Blue Canyon meteorological station. CSP requests a detailed map displaying modelled air pollutant levels at nearby "Sensitive Receptors" and for the region in general. CSP cannot effectively interpret the air quality impact data as is currently presented to evaluate risks for Empire Mine SHP resources, personnel, and recreational users.

Agcy 1-11

- On *Page 4.3-62*: "Discrete cartesian receptors were placed at residents proximate to the project sites. A uniform Cartesian grid of 4,426 by 3,299 meters was centered over the project sites to capture the maximum point of impact and extent of the plume isopleth."
  - CSP cannot find a detailed discussion, map, or table of this "grid". CSP requests to know where the "maximum point of impact and extent of the plume isopleth" is located. CSP cannot effectively evaluate impacts to the Park, employees, residents, and recreational users without knowing this important crucial data.

Agcy 1-12

- *On Page 4.3-65: Applicant Proposed Emissions Reduction Measures*
  - APM-AQ-2: Surface Fugitive Dust Controls
    - "The following measures shall be implemented to reduce surface fugitive dust emissions: During construction, operation, and reclamation, all exposed soil surfaces (e.g., unpaved disturbed areas, unpaved parking areas, and unpaved staging areas, and soil piles) shall be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring. As an alternative to watering, inactive soil piles shall be covered to minimize wind erosion. During construction, all on-site roadways shall be paved as soon as possible after grading and

any unpaved gravel roads shall be treated with chemical stabilizers in order to control fugitive dust."

- CSP has found no details on what the "chemical stabilizers" are within the DEIR. There are exactly four mentions of the chemical stabilizers within the entire DEIR, and no analysis of potential hazards associated with their potential release into the environment. CSP believes all "chemicals" associated with the project should be disclosed and evaluated for potential impacts, especially if they could be water soluble and find an entryway to South Fork Wolf Creek from surface runoff or become airborne.

- *Project-Specific Impacts and Mitigation Measures - 4.3-1 Conflict with or obstruct implementation of the applicable air quality plan. Based on the analysis below and with implementation of mitigation, the impact is less than significant.*

  - *Page 4.3-70*: "Therefore, prior to mitigation, the project would result in potentially significant levels of ROG, NOx, and PM10 emissions and could conflict with or obstruct implementation of the Ozone Attainment Plan pursuant to Criterion 1."
    - CSP recognizes this potential for air quality impacts and is very concerned about this issue in regard to the health and welfare of the Park, its employees, residents, and visitors. CSP is in full support of the Ozone Attainment Plan to insure the region's future health.

Agcy 1-13

  - *Page 4.3-73*: "Conclusion - Based on the analysis presented above, the proposed project would comply with Criterion 2. However, as presented in Table 4.3-17, emissions of ROG, NOx, and PM10 would be potentially significant (Level A or B) during construction, operations, and reclamation, and mitigation would be required in order for the project to comply with Criterion 1. Because the project would not comply with Criterion 1 without mitigation, implementation of the project could conflict with the Ozone Attainment Plan, and implementation of the project could create a conflict with or obstruct implementation of the applicable air quality plan related to the region's nonattainment status for ozone and PM10, resulting in a significant impact prior to implementation of mitigation."
    - CSP recognizes this potential for air quality impacts and is very concerned about ozone and PM10 pollution in regard to the health and welfare of the Park. CSP is in full support of the Ozone Attainment Plan to insure the region's future health.

  - *Page 4.3-73*: "Mitigation Measure(s) The emission data presented in Table 4.3-17 (i.e., unmitigated emissions) reflect the reductions that would occur with implementation of APM-AQ-1 and APM-AQ-2. Table 4.3-19 shows the estimated maximum daily mitigated emissions associated with construction, operation, and reclamation of the project, accounting for additional emissions reductions associated with Mitigation Measure 4.3-1(b), which would result in a reduction in construction contractors' equipment exhaust criteria air pollutants during project construction (year 2021)."

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- Mitigation Measure 4.3-1(b) *Construction Exhaust Emissions Minimization Plan* is wholly based on the exact duplication of *Applicant Proposed Emissions Reduction Measure APM-AQ-1 Exhaust Emission Controls (page 4.3-65)*. CSP believes that this mitigation must be in error and questions how can the exact duplicate mitigation achieve a reduction in air quality emissions, when "unmitigated emissions" already reflected a reduction in emissions with using *California Air Resources Board (CARB) certified Tier 4 Final engines* with the applicant's own APM-AQ-1 *Exhaust Emission Controls* mitigation? According to the CEQA process, mitigations should be clear in the process of how they will effectively mitigate the impact [*Sundstrom* v. *County of Mendocino* (1988) 202 Cal.App.3d 296]. Since this mitigation is unclear at best how it would achieve any reductions in air quality impacts, CSP believes that Mitigation Measure 4.3-1(b) should be null and void and would thus change the impact to *Significant.*

Agcy 1-15

- CSP believes Project Impact 4.3-1 is still *significant* even after all stated mitigations (even with questioning the duplicate mitigations detailed above), based on Northern Sierra Air Quality Management District (NSAQMD) criteria. CSP believes the project would still conflict with the Ozone Attainment Plan based on NSAQMD criteria even after "implementation of mitigation", by measurements of the applicant's own air quality impact data. The differences in emissions from *Table 4.3-17 Maximum Unmitigated Daily Project Emissions (lbs/day)* to *Table 4.3-19 Maximum Mitigated Daily Project Emissions (lbs/day)* are almost negligible for NOx and PM10, and in some cases have no reduction in emissions at all. NOx unmitigated emissions during *Year 2022 to 2026 – Mining, Brunswick Industrial Site Operations, Fill Placement at Centennial Industrial Site* is listed at 107.49 lbs/day and after mitigation measures is still listed at 107.49 lbs/day, which still qualifies as significant under NSAQMD criteria. PM10 is listed at 54.40 lbs/day for "Unmitigated" and the exact same 54.40 lbs/day for "Mitigated". NOx and PM10 Values for *Year 2027 to 2032 – Mining, Brunswick Industrial Site Operations, Fill Placement at Brunswick Industrial Site* and *Year 2033 to 2102 – Mining, Brunswick Industrial Site Operations, Fill Placement at Off-Site Location* are also the exact same for both figures. Mitigation for NOx and PM10 has not been achieved by any actual reduction in values.

Agcy 1-16

Page 4.3-73: "Additional reductions could not be quantified for Mitigation Measure 4.3-1(a), which are the NSAQMD recommended mitigation measures that are applicable to the project. According to the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds (included as Mitigation Measure 4.3-1[b] below) would reduce project impacts to a less-than-significant level during all years of project construction, operations, and reclamation."

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- CSP believes the reference to *Mitigation Measure 4.3-1[b]* is in error. The components in *Mitigation 4.3-1[b]* are not listed anywhere within any NSAQMD relevant documents. NSAQMD's recommended mitigations are instead correctly listed as *Mitigation 4.3-1(a)* on *Table 2-1 Summary of Impacts and Mitigation Measures* and on *Page 4.3-77* and can be correctly identified in Guidelines For Assessing And Mitigating Air Quality Impacts Of Land Use Projects, Section I. Mitigations for Use During Design and Construction Phases" (NSAQMD, revised 2009).

Agcy 1-17

- Although the Project would put forth mitigations listed under the NSAQMD's "Guidelines" in *Mitigation 4.3-1(a)* the project is noted to still have air pollutant threshold "Level B" of NO_x *after* mitigations for the following project phases: *Year 2022 to 2026 – Mining, Brunswick Industrial Site Operations, Fill Placement at Centennial Industrial Site Year 2027 to 2032 – Mining, Brunswick Industrial Site Operations, Fill Placement at Brunswick Industrial Site and Year 2033 to 2102 – Mining, Brunswick Industrial Site Operations, Fill Placement at Off-Site Location*. The NSAQMD "Guidelines For Assessing And Mitigating Air Quality Impacts Of Land Use Projects" document clearly states in Step Three: Emission Thresholds of Significance, Page 9 that "*NOx, ROG and PM10 emissions must be mitigated to a level below significant. If emissions for NOx, ROG and PM10 exceeds 136 pounds per day (Level C), then there is a significant impact; below Level C is potentially significant.*" CSP therefore believes emissions are clearly still *potentially significant* even after mitigations.

Agcy 1-18

- *Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy* and *Appendix E.1 Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California* fails to mention that the NSAQMD also requires that projects follow the mitigations in the "IV. Mitigation for Land Use Emissions" section of the "Guidelines," as this is foremost a "Land Use" project. Unfortunately, regardless of this omission, the applicable mitigations under section IV. from the NSAQMD appear to be based on a "Land Use" residential housing / retail shopping development with the following mitigations listed:
  - *IV. Mitigation for Land Use Emissions for Classification as Level B or Level C Threshold*
    - *a. The project shall incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, retail and housing options where feasible.*
    - *b. Larger projects shall provide for neighborhood parks or other recreational options such as trails to minimize vehicle travel to off-site recreational uses and/or commercial areas.*

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- *c. The project should provide densities of nine units per acre or greater, where allowed by the General Plan and/or Zone Plan, along bus routes and at bus stops to encourage transit use, where feasible.*

CSP understands then that these mitigations are clearly not applicable to a Land Use project centered on mining extraction and have no use in this Project for significantly reducing air quality impacts. Fortunately, the NSAQMD does allow for the Lead Agency in CEQA projects to "revise" mitigations and admits that the list of mitigations within the "Guidelines" are not "*all-inclusive*" and are only a "*suggested list*" on Page 10. The "Guidelines" state that "*the District will request that the lead agency review a suggested list of mitigations (below) for both short-term and long-term sources. This list is not all-inclusive, and may be revised by the lead agency. During the CEQA review process, the District recommend (or the applicant may propose) additional, project-specific mitigation measures.*"

Since both *Mitigation Measure 4.3-1(a)* and *4.3-1(b)* have been clearly shown to be inadequate in mitigating air quality impacts, and without other applicable mitigation written guidance from the NSAQMD, CSP requests that Nevada County follow NSAQMD's suggestion to revise the mitigation measures for Air Quality impacts to include more *project-specific mitigations*.

- *Project-Specific Impacts and Mitigation Measures - 4.3-2 Expose sensitive receptors to substantial pollutant concentrations. Based on the analysis below and with implementation of mitigation, the impact is less than significant.*

Agcy 1-19

As discussed on Page 3 and Pages 5-7 of these comments, CSP has detailed how Empire Mine State Historic Park has been neglected to be evaluated as a *sensitive receptor*. With the Park located 450 feet away from the Brunswick facility boundary and 900 feet south of the Centennial facility, CSP believes that air pollutants of concern from the project would impact Park recreational users and Park employees. CSP cannot effectively evaluate if the Park would be *exposed to substantial pollutant concentrations* of both toxic air contaminants (TACs) and *Criteria Pollutants* NOx and PM10 without a thorough discussion, visual representation, and analysis centered on the Park as a sensitive receptor. CSP therefore requests that *Impact 4.3-2* be changed to *potentially significant* until the DEIR can be shown to prove mitigations would be effective at reducing the impacts to *less than significant* for the Park.

Agcy 1-20

- CSP further believes its concerns about the potential for both TAC's and NOx and PM10 impacting the health of the Park and its users is the DEIR's reliance on inadequate mitigations from Impact 4.3-1 that were detailed on pages 8-11 of these comments. The DEIR makes the following statements on *Page 4.3-81*:

- "Because ROG and NOx emissions associated with project construction, operation, and reclamation would be potentially significant before mitigation, the project could minimally contribute to regional O3 concentrations and the associated health effects."

- "Health effects that result from NOx (including NO2) include respiratory irritation. NOx emissions from project construction, operation, and reclamation would occur at NSAQMD threshold Level B."

- "Construction, operation, and reclamation of the project would result in PM10 emissions at NSAQMD threshold Level A, which would be considered potentially significant before mitigation. As such, the project would potentially contribute to exceedances of the CAAQS for PM10, and would potentially obstruct the MCAB from coming into attainment for this pollutant. The project would be required to comply with NSAQMD Rule 207, Particulate Matter, and would implement APM-AQ-2, Surface Fugitive Dust Controls, which would limit the amount of dust generated during project implementation. By reducing the generation of fugitive dust through compliance with the foregoing NSAQMD rules and APM-AQ-2, emissions of PM10 would be reduced to the maximum extent practicable and receptors would not be exposed to excess pollutant concentrations."

With the DEIR's own admissions above that O3 and NOx emissions can lead to negative health impacts, there is no verifiable data within this section to refute that "receptors would not be exposed to excess pollutant concentrations." NOx emissions are stated to be exactly the same in the Project for all phases after construction even after mitigation, which is *Potentially Significant* according to NSAQMD. Mitigation measure APM-AQ-2 has already been factored in *Table 4.3-17 Maximum Unmitigated Daily Project Emissions (lbs/day)* and has also been found to stay at the same levels for all phases of the Project post construction.

Chapter 4.3 – Chapter 4.4 – Biological Resources

- *4.4-2 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status wildlife species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Based on the analysis below and with implementation of mitigation, the impact is less than significant.*

Agcy 1-21

  - CSP believes that the impact should be changed to *potentially significant* based on the potential that either Foothill Yellow Legged Frog, California Red-Legged Frog, or Willow Flycatcher may occupy downstream habitat within the South Fork Wolf Creek riparian corridor on Empire Mine State Historic Park lands. Downstream habitat at the Park has not been adequately evaluated by the Project's biological consultants. CSP believes that the Project's mine de-watering, subsequent non seasonal

flooding, and contribution to erratic and fluctuating water levels within South Fork Wolf Creek could disrupt potential sensitive or special status wildlife species within the Park.

- CSP has detected an occurrence of *Empidonax traillii*, Willow Flycatcher, (CA state listed "Endangered") within the Bennett Street Grasslands adjacent to the South Fork Wolf Creek in the recent past. CSP believes that the cumulative potential impact of mine dewatering on the riparian corridor, coupled with potential noise and vibration impacts, warrants review for sensitive or special status wildlife in downstream and nearby lands including at the Park.

Agcy 1-22

- *Foothill Yellow Legged Frog - Chapter 4.4 – Biological Resources*
  - *Page 4.4-69* states: "Given the species has not been previously identified within the South Fork Wolf Creek watershed and only marginal suitable habitat occurs within the Brunswick Industrial Site for the species, there is a very low likelihood this species occurs within the South Fork Wolf Creek."
    - CSP disagrees with the assumptions made above that there is a "very low likelihood this species occurs within the South Fork Wolf Creek." Documentation and evaluation of downstream habitat within the South Fork Wolf Creek riparian has been wholly inadequate within the DEIR and is based on one occurrence within the *Reconnaissance Level Biological Resources Field Surveys* section on *Page 4.4-53* when contract biologist Greg Matuzak surveyed an unknown section of South Fork Wolf Creek on Park property on August 29, 2019.

Agcy 1-23

  - *Page 4.4-70* states: "Therefore, based on the conclusion of Balance, potential downstream impacts to the stream channel and associated riparian zone along both sides of South Fork Wolf Creek from the additional discharge of 5.6 cfs would be minimal on sensitive biological resources, such as foothill yellow-legged frog, and do not represent a potential significant impact to the stream channel or associated riparian zone within South Fork Wolf Creek."
    - CSP disagrees that additional discharge of 5.6 cfs would be minimal on sensitive biological resources. The DEIR does not contain adequate analysis concerning the nature of the Project's mine de-watering proposal, specifically relating to erratic and fluctuating water inputs that have been detailed on *Page 70, 4.0 Project Effects* in *Appendix K.2 Groundwater Hydrology And Water Quality Analysis Report For The Idaho-Maryland Mine Project -Nevada County, California* and in *Chapter 4.8 – Hydrology and Water Quality Page 4.8-45*:
      - "Initial dewatering of the Idaho-Maryland Mine will occur at a rate of 2,500 gpm, or 5.6 cfs. If this rate of dewatering is achieved it would take approximately 160 days (5.3 months) to dewater the underground

Agcy 1-24

workings, assuming an average groundwater inflow rate into the existing mine workings of 850 gpm and total water currently in the mine workings of 385 million gallons. After that time, the dewatering will continue at a rate equal to the groundwater inflow into the mine, ranging from approximately 500 gpm to 1200 gpm seasonally and averaging approximately 850 gpm or about 1.9 cfs. The maximum discharge rate permitted will be 2,500 gpm, which will allow flexibility for unexpected seasonal inflows, operational issues, and increased groundwater inflows from the expansion of the mine during operations."

- CSP is extremely concerned with this project detail that would allow maintenance dewatering to occur up to 5.6 cfs at any time during the life of the Project. Water levels within South Fork Wolf Creek could theoretically change above baseline conditions from less than 1.9 cfs to 5.6 cfs depending on mine operations. Fluctuating water levels especially during the summer months when creeks normally return to a slower flow could have potential to disrupt many forms of life dependent on the normal ebbs and flows of riparian water levels. CSP has no mechanism to evaluate the impacts from erratic and fluctuating water levels during the summer breeding months, and unfortunately the DEIR does not attempt too either.

Agcy 1-25

- Considering the above-mentioned project proposal and comments, CSP is especially concerned with how proposed fluctuating water levels within South Fork Wolf Creek would impact potentially occurring species such as the Foothill Yellow Legged Frog. "California Herps" website states that Foothill Yellow Legged Frogs "mating and egg-laying occurs exclusively in streams and rivers (not in ponds or lakes) from April until early July, after streams have slowed from winter runoff." Amphibians in general rely on a slow, steady water level to insure egg survival.

Agcy 1-26

- *Non-Special Status Birds Protected by Other Laws, Wildlife Disturbance*
  - *Page 4.4-74* states: "Above-ground activities would generate noise during project operations, including placement of engineered fill, shaft ventilation fan, exterior pumps outside the process plant building, water treatment plant pumps and turbine aerator, and Brunswick shaft skipping within the headframe building. However, it is important to remember that most protected species have a low to very low potential to occur on the Centennial Industrial Site and Brunswick Area."
    - CSP requests an evaluation of generated noise impacts on wildlife within the nearby areas of the Park, including the northwest corner of the Union Hill area (450 feet away from Brunswick facility boundary), and the Bennett Street Grasslands (900 feet away from the Centennial site). CSP cannot adequately

evaluate potential noise impacts on sensitive potential wildlife species including detected "California Birds of Special Concern" Yellow Warbler, Yellow Breasted Chat, and Olive-sided Flycatcher from the information within the DEIR.

- *Mitigation Measures*
  - *Foothill Yellow-Legged Frog, 4.4-2(a) Pre-construction Survey and Avoidance and Minimization Measures. Page 4.4-75*
  - *California Red-Legged Frog 4.4-2(c) Pre-construction Survey and Avoidance and Minimization Measures. Page 4.4-77*

Agcy 1-27

- Both the above mitigations require preconstruction surveys on the Project sites within riparian and wetland habitats. Since the DEIR has not adequately evaluated downstream potential for either species of frogs to occur, these mitigations would not adequately protect either species if found within the riparian corridor of South Fork Wolf Creek or within known wetland habitat at the Bennett Street Grasslands that are both held within the Park. CSP has established previously in these comments that fluctuating and erratic water levels from mine dewatering maintenance proposed actions (referenced from *Page 70, 4.0 Project Effects* in *Appendix K.2* and *Chapter 4.8 – Hydrology and Water Quality Page 4.8-45)* could have unknown and potentially negative impacts to amphibian habitat, especially regarding breeding. CSP requests both an evaluation of the South Fork Wolf Creek riparian and wetland habitats within the Park, for both Foothill Yellow Legged and California Red Legged Frogs to be included in the DEIR, and for the Park lands along the South Fork Wolf Creek to be included in *Pre-construction Survey and Avoidance and Minimization Measures 4.4-2(a)* and *(c)*.

- *4.4-3 Have a substantial adverse effect on riparian habitat or other sensitive natural community, or State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Based on the analysis below and with implementation of mitigation, the impact is less than significant*

Agcy 1-28

  - *Page 4.4-87* states: "Conclusion - Based on the above, implementation of the proposed project at the Centennial Industrial Site and Brunswick Industrial Site, and East Bennett ROWs could have a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on State or Federally protected aquatic resources (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means. Thus, a *significant* impact could occur."
    - "Mitigation Measure(s) Implementation of the following mitigation measures would reduce the above impact to a level."
      - Although CSP appreciates the mitigations listed to protect the immediate riparian and wetland habitats within the Brunswick and Centennial

properties, CSP disagrees that the Mitigation Measures listed under impact 4.4-3 would reduce the impact of substantial adverse effects on riparian habitats and/or sensitive natural communities to *less-than-significant*. Mitigation measures fail to address and thus adequately protect downstream riparian habitat and sensitive natural communities from "hydrological interruption or other means" due to proposed mine dewatering inputs into the South Fork Wolf Creek which could fluctuate from 1.9-5.6 cfs for the life of the Project (referenced from *Page 70, 4.0 Project Effects* in *Appendix K.2)*.

- CSP has the following California Department of Fish and Wildlife Sensitive Natural Communities known within the Park adjacent to the South Fork Wolf Creek riparian area at either the Bennett Street Grasslands or the "Upstream Reach" (Sensitive Natural Communities from been identified from the California Sensitive Natural Communities list updated August 18, 2021):
  - 41.050.05 *Danthonia californica*
  - 61.201.01 *Salix lasiolepis*
  - 61.420.07 *Alnus rhombifolia / Cornus sericea*
  - 52.206.01 *Grindelia camporum*
  - 45.165.01 *Carex densa*
  - 82.200.50 *Pseudotsuga menziesii – Arbutus menziesii*
  - 61.450.01 *Acer macrophyllum / Rubus ursinus*

- CSP cannot adequately evaluate potential effects to existing "Sensitive Natural Communities," riparian trees, willow thickets, amphibian and fish spawning habitat, and benthic macroinvertebrates held within the Park from the information given within the DEIR.

Chapter 4.7 – Hazards and Hazardous Materials

Project-Specific Impacts and Mitigation Measures

- *4.7-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Based on the analysis below, with implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant.*

Agcy 1-29

- CSP is validly concerned with the manner in which explosives and their constituent components will be handled, particularly during transport, delivery and unloading at the Brunswick site. CSP appreciates that several relevant regulations are cited (49 CFR 177 subpart B, 49 CFR 397.7), but the specific process by which explosives will be received, documented, and transferred to storage in the "Service Shaft" is not described in the DEIR. In addition, the added potential hazards for local Nevada County Roadways with transporting explosives routinely and the potential for accidents are of concern for CSP. For this reason, we cannot adequately understand the risks, nor could

the applicant mitigate for the potentially significant impacts, of such explosives, particularly as a potential hazard source of wildfire ignition. CSP also believes that the quantity and frequency of explosives deliveries have not been evaluated. CSP believes that based on the potential for an accident based on the sheer volume of explosives used and transported in the Project, this impact should be changed to *potentially significant*.

Chapter 4.8 – Hydrology and Water Quality

- *Regional Hydrology*
  - *Page 4.8-4* states: "Peak flow rates for a 10-year, 24-hour storm event and a 100-year, 24-hour storm event have been reported by Cranmer Engineering, Inc. (Cranmer, 1986) as part of the development of the Storm Drainage Master Plan for the City of Grass Valley. For **South Fork Wolf Creek** at Hennessy School (i.e., the 2.75 square mile area of the watershed upstream of State Route [SR] 49), **Cranmer (1986) calculated peak flow rates of 658 cfs for the 10-year, 24-hour storm, and 1,087 cfs for the 100-year, 24-hour storm**. Thus, peak flow rates during significant storm events may be as much as two-to-three orders of magnitude (100 times to 1,000 times) greater than the base flow in, or the NID discharges to, South Fork Wolf Creek.

Agcy 1-30

    - With respect to Cranmer (1986), CSP disputes the stated calculated peak flow rates for the South Fork Wolf Creek that are referenced above and believes they could misinform the public and agencies regarding the hydrological system inherent to this watershed. The original document referenced within *Appendix K.2* "Cranmer Engineering, Inc. (1986). *City of Grass Valley, Storm Drainage Master Plan and Criteria*. Priority List Summary, page 2." (https://www.cityofgrassvalley.com/sites/main/files/file-attachments/sd_master_plan_priority_list.pdf?1617826732) is only a table of storm drainage features with no documentation on how values were calculated. The estimate for 658 cfs for a 10-year, 24-hour storm is located at an open concrete ditch adjacent to the Hennessey School which Cranmer notes that it needs a 98 inch (8 feet) diameter concrete pipe, which is approximately the width of the existing channel in 2022. CSP does not have figures for baseline or peak flow measurements at this site, but for comparison, the South Yuba River located in Nevada County, considered the largest river in Nevada County, has an average baseline flow of 150-600 cfs during the winter months peaking in the 1000's during storm events at the Jones Bar USGS gauge station (https://www.dreamflows.com/graphs/avg.065.php). CSP has measured flows at the Bennett Street Grasslands portion of the South Fork Wolf Creek as high as 11 cfs within the past two winters. CSP staff theorize winter storms can average as high as 20 cfs potentially, but disagree with figures in the hundreds or thousands, regardless of the magnitude of the storm.

  - *Page 4.8-4* states: "Based on the stream gaging data and manual measurements made in 2019 to January 2021, base flows range from 0.07 cfs in the summer to 6.5

Agcy 1-31

cfs in the winter. Peak flow during the monitoring period occurred on April 5, 2020 at 33.4 cfs in response to a two-day rainfall event totaling approximately 10 inches."

- CSP appreciates knowing flow measurements for the South Fork Wolf Creek upstream from its properties, and notes that according to the data in *Appendix I – Record of South Fork Wolf Creek Streamflow* contained within *Appendix K.2*, the average "Daily Mean Streamflow" during fall/winter 2020 was as low as 0.2 cfs, with Daily Mean Streamflows as high as 4 cfs during storm events. For reference CSP has measured flows manually as high as 11 cfs within the last two years on the South Fork Wolf Creek. Recently on 03/16/2022 flow was recorded as only .69 cfs by Park staff, and routinely have been measured from 1-2 cfs after average storm events. Winter storm events have been captured from 4-11 cfs on Park property. CSP staff theorize peak flows as high as 20 cfs are common every few years on the South Fork Wolf Creek.

Agcy 1-32

- *South Fork Wolf Creek Geomorphology, Page 4.8-26* states: "South Fork Wolf Creek - Reach D - Reach D receives runoff and sediment from a watershed of approximately 2.2 square miles (U.S. Geological Survey [USGS], 2019). The average reach slope was measured to be 0.5 percent. The reach is in an unconfined valley with an active floodplain and riparian zone and exhibits poolriffle morphology, defined by an undulating bed with a sequence of sediment bars, pools, and riffles. Bars and riffles are comprised of mostly gravel-sized sediment."
  - CSP would like to acknowledge that "Reach D" is contained entirely within the Park at the Bennett Street Grasslands and its ecosystem health is of utmost importance to CSP.
  - *Figure 4.8-9, South Fork Wolf Creek Reaches in Project Vicinity* on *Page 4.8-25* incorrectly displays Empire Mine State Historic Park borders and does not include the Bennett Street Grasslands, which are featured as the entirety of "Reach D."

Agcy 1-33

- *4.8.3 Regulatory Context - Federal Clean Water Act*
  - CSP appreciates an overview of the regulatory framework from the Clean Water Act on *Pages 4.8-26-27*, but missing from this subsection is an excerpt from *Appendix K.1 Geomorphic Assessment SF Wolf Creek, page 5:* "2.1 The Clean Water Act - The United States Environmental Protection Agency (USEPA), through the state regulatory agency (Central Valley Regional Water Quality Control Board, or RWQCB), issues general permits for industrial discharges under the National Pollutant Discharge Elimination System (NPDES). Under the NPDES, a Limited Threat Discharge permit may be authorized for discharges that are relatively pollutant-free and present no or minimal threat to water quality or the environment, **including harm or impairment to existing beneficial uses of receiving waters** (RWQCB, 2018)."

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- CSP would like to acknowledge the repeated theme present in many local, state and federal regulations about protecting downstream ("receiving waters") beneficial uses.

- *4.8.3 Regulatory Context - Central Valley Regional Water Quality Control Board*

  - CSP appreciates including the following excerpt on *Page 4.8-28* which includes reference to protecting "beneficial uses" such as "aquatic resources" from water quality degradation, which would include the whole of South Fork Wolf Creek on Park lands:

    - "As authorized by the Porter-Cologne Water Quality Control Act, the CVRWQCB primary function is to protect the quality of the waters within its jurisdiction for all beneficial uses. State law defines beneficial uses of California's waters that may be protected against quality degradation to include, but not be limited to: domestic; municipal; agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and **preservation and enhancement of fish, wildlife, and other aquatic resources or preserves**."

Agcy 1-34

- *4.8.3 Regulatory Context – Basin Plans*

  - As CSP detailed in the "General Comments" above on Pages 2-3, the concept of "Beneficial Uses" is of critical importance to an evaluation of potential impacts to the downstream portions of South Fork Wolf Creek below the Brunswick facility. CSP appreciates the overview of the CVRWQCB 2018 Sacramento and San Juaquin Basin Plan on *Page 4.8-31* that references the protection of "Beneficial Uses" eight times, including "non-contact water recreation, including aesthetic enjoyment; warm and cold freshwater habitat; and wildlife habitat. These uses describe current "use" of the South Fork Wolf Creek within Park lands.

Agcy 1-35

- *Local Regulations - Nevada County General Plan - Page 4.8-33*

  - CSP appreciates the review of *Policy FH-10.3.2, Safety Element - Goal FH-10.3 Reduce the potential for injury, property damage, and environmental damage from flooding* which states "**Avoid increases in downstream flooding potential by protecting natural drainage**". CSP acknowledges that the Project's proposal to release up to 5.6 cfs of mine water into South Fork Wolf Creek conflicts with this policy.

Agcy 1-36

  - CSP appreciates the review of *Policy 11.6A, Water Element - Goal 11.1 Identify, protect and manage for sustainable water resources and riparian habitats* which states: "New development shall minimize the discharge of pollutants into surface water drainages by providing the following improvements or similar methods which provide equal or greater runoff control: (a) include curbs and gutters on arterials, collectors, and local roads consistent with adopted urban street designs; and (b) **oil, grease, and silt traps** for subdivisions creating five or more parcels and commercial and industrial development of one acre or greater size. Maintenance of such facilities shall be assured through a

Agcy 1-37

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legally enforceable mechanism." CSP has found no mention of "oil, grease and silt traps" within the Project's proposal in the DEIR. Protecting the South Fork Wolf Creek from oil and sediment runoff from the Brunswick facility is of utmost importance to CSP. CSP requests to evaluate a detailed Industrial Stormwater Pollution Prevention Plan (I-SWPPP) as part of this DEIR. CSP cannot evaluate impacts to the South Fork Wolf Creek from potential degradation to water quality from surface runoff pollutants without a I-SWPPP addressing these concerns.

Agcy 1-38

- CSP appreciates the review of *Policy 17.11(c), Mineral Management – Goal 17.1* "Requiring that any increase or decrease of off-site discharge is not detrimental to the downstream environment or downstream water users." CSP acknowledges that the Project's plan for mine dewatering potentially conflicts with this regulation. CSP cannot evaluate potential impacts to the South Fork Wolf Creek from erratic and fluctuating water levels from the information contained within the DEIR at present.

- *4.8.4 Impacts And Mitigation Measures*

  - *4.8-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Based on the analysis below, with the implementation of mitigation the impact is less than significant.*

    - CSP finds this Impact and the discussion that follows confusing and misleading. The first section states on *Page 4.8-54*: "Thus, the project could not impede sustainable groundwater management within a groundwater basin, because no such basin exists in the project vicinity", while then discussing groundwater depletion effects to residential wells, and thusly requiring mitigations.

Agcy 1-39

- CSP requests a complete and separate *Impact* based on groundwater depletion and evaluation of effects to the surrounding region, including not only residential wells, but also on the surrounding ecosystem. CSP owns property within Empire Mine SHP that will be affected by groundwater depletion (according to *Figure 4.8-12 Well Locations and Itasca Drawdown* on *Page 4.8-63*). Properties include mature coniferous forests at Union Hill, riparian forests of the "Upstream Reach" and of Bennett Street Grasslands along the South Fork Wolf Creek, and wet meadows within Bennett Street Grasslands.

- CSP cannot evaluate impacts from groundwater depletion of 1-5 feet within the Park since no such model exists within the DEIR. Potential effects of a lessening water table could be tree mortality and die-off of existing plant communities. CSP recognizes these are unknowns, but again needs a mechanism for evaluation.

- CSP cannot effectively evaluate impacts of groundwater depletion modeling on the Park, as the boundaries of Empire Mine SHP are

not present on either *Figure 4.8-12 Well Locations and Itasca Drawdown*, *Figure 4.8-11 Simulated Drawdown of Groundwater Levels at End of Future Mining Relative to 2019 Water Level*, or on *Figure 4.8-13 Potential Expansion of Future Mine*, nor were any maps or figures included in *Appendix K.2 Groundwater Hydrology and Water Quality Analysis* displaying Park boundaries. CSP requests all relevant maps and figures of groundwater depletion to include the boundaries of Empire Mine State Historic Park and only then can CSP staff effectively evaluate this impact.

- *Mitigation Measure 4.8-2(a)*:
  - *Page 4.8-67*: "The project applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County."

Agcy 1-40

    - While CSP appreciates the proposal for Groundwater Monitoring before mine dewatering commences, we respectfully request Groundwater Monitoring to also include portions of the Park, located within the "Upstream Reach" and within the Bennett Street Grasslands in areas that are modeled to have groundwater depletion on *Figure 4.8-12 Well Locations and Itasca Drawdown*.

- *Mitigation Measure 4.8-2(b)* and *(c)*:
  - CSP recognizes that *Mitigation Measure 4.8-2 (b)* and *(c)* are wholly focused on supplying lost groundwater to residential well customers.

Agcy 1-41

  - CSP recognizes that the Project is focusing on mitigating the impact of groundwater depletion through *Mitigation Measures 4.8-2 (a-c)*. CSP requests a complete analysis of groundwater depletion within the affected portions of the Park. Once analysis is complete, an appropriate mitigation should be created for any potential effects on vegetation communities within the Park.

- *Impact 4.8-3*, *Page* "Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

Agcy 1-42

  i) Result in substantial erosion or siltation on- or off-site?
  ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
  iii) Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

iv) Impede or redirect flood flows?

Based on the analysis below and with implementation of mitigation, the impact is *less than significant*."

- CSP acknowledges that this impact *may* be "*less than significant*" for the South Fork Wolf Creek based on hydrological technical reports *Appendix K.1 and K.2* detailing that "substantial" erosion or siltation would not occur at 5.6 cfs of mine dewatering. However, even Balance Hydrologics found in *Appendix K.1* in *Figure 5-6 Preliminary suspended-sediment load rating curve, South Fork Wolf Creek above proposed discharge location, Nevada County, California* that between 0.6-0.7 tons of day of sediment transport happen at flows of 5-6 cfs. CSP staff has noted visible Turbidity at flows equal and greater than 4 cfs.

  In addition, although 5.6 cfs of flow within the South Fork Wolf Creek may not contribute to "substantial erosion," adding an additional 5.6 cfs to winter storm event flows with a baseline flow over 15 cfs would, according to *Page 4.8-74:*

  - "Sediment pebble count analysis conducted by Balance (2020) indicates that the flow rate at which sediment within the channel may become mobilized ranges from 20 cfs to 90 cfs."

  Balance Hydrologics and EMKO Environmental, Inc. theorize that the threshold for "bedload sediment mobility" is 23 cfs in the following statement on *Page 4.8-74:*

  - "With the addition of the maximum proposed discharge of 5.6 cfs and increasing measured baseflows by a 50 percent safety factor, post-project baseflows during nonstorm periods would be expected to range between approximately 5.8 cfs and 15 cfs. These estimates are less than 23 cfs, the threshold for bedload sediment mobility and well below flows that commonly exhibit significant work on the channel (i.e., 1- to 2-year flood). Balance therefore concludes that discharges during baseflow periods would not result in substantial erosion or siltation on site in South Fork Wolf Creek. ECM is in agreement with Balance that the addition of 5.6 cfs to the South Fork of Wolf Creek drainage basin would have no significant effect on the stream channel or banks, or to the turbidity of the South Fork Wolf Creek."

    - CSP disputes the notion that 23 cfs is a *definite* threshold for bedload sediment mobility. The figure of 23 cfs is referenced from *Appendix K.1* on *Page 27:* "Using indirect methods to estimate peak in Reach D3, peak flow from the December event was estimated to be approximately 23 cfs." CSP cannot base evaluation of sediment mobility based on one *indirect* measurement within one year of monitoring. Balance did note that sediment was not substantially mobile at flows below 17.3 cfs, in *Appendix K.1* on *Page 39:* "Field measurements at stream flows between 11 cfs and 17.3 cfs showed no active bedload transport". CSP does not dispute

the observation and appreciates this information that substantial erosion was not evident at flows less than 17.3 cfs. CSP thus can effectively agree that it appears that bedload sediment mobility happens above 17.3 cfs, but potentially not lower based on Balance Hydrologics' assessments.

Agcy 1-43

- CSP also disputes the notion that "that the addition of 5.6 cfs to the South Fork of Wolf Creek drainage basin would have no significant effect on the stream channel or banks, or to the turbidity of the South Fork Wolf Creek." CSP believes this statement assumes that there is not a potential baseline flow of ~12 cfs existent post winter storm, whereby flows would then combine to +17.6 cfs and thereby *potentially* contribute to bedload sediment mobility.

Agcy 1-44

- CSP also disputes that 5.6 cfs would not have a "significant effect" on "turbidity of the South Fork Wolf Creek". Balance Hydrologics have established in *Appendix K.1* in *Figure 5-6 Preliminary suspended-sediment load rating curve, South Fork Wolf Creek above proposed discharge location, Nevada County, California* that between 0.6-0.7 tons a day of sediment transport happen at flows of 5-6 cfs. Balance has also noted "slightly turbid" water present on 1/24/2020 at a flow of 1.56 cfs; "very turbid" water on 1/26/20 at a flow of 11 cfs; "water slightly turbid" on 3/18/2020 at a flow of 3.22 cfs; "slightly turbid" on 3/29/20 at a flow of 1.91 cfs; "upper watershed channel is very turbid" on 4/5/20 at a flow of 20.4 *cfs*; "Slightly turbid" on 4/7/20 at a flow of 4.14. cfs; (figures taken from *Appendix I – Record of South Fork Wolf Creek Streamflow* contained within *Appendix K.2*).

Agcy 1-45

Based on Balance Hydrologics' own observations that turbidity exists in some form above or equal to 1.56 cfs, with "very turbid" water existing above or equal to 11 cfs, and the DEIR stating on *Page 4.8-74*: "post-project baseflows during nonstorm periods would be expected to range between approximately 5.8 cfs and 15 cfs," CSP believes that turbidity in the South Fork Wolf Creek would be *potentially* significant. "Very turbid" water would potentially occur from 11 -15 cfs during "post-project baseflow". *Appendix K.1* in *Figure 5-6 Preliminary suspended-sediment load rating curve, South Fork Wolf Creek above proposed discharge location, Nevada County, California* displays approximately between 0.6-0.7 tons of day of sediment transport happen at flows of 5-6 cfs, and at 10 cfs this figure is approximately 1.2 tons per day. The DEIR does not adequately relay how many tons of sediment transport is acceptable without mitigations, or before this impact is considered *significant*. CSP therefore requests that *Impact 4.8.3* should be changed to *potentially significant* regarding turbidity (suspended sediments) and acknowledges that the addition of 5.6 cfs of mine dewatering also would bring the South Fork closer to its erosion potential during storm events, (within 2.3 cfs) of *potential* substantial erosion and siltation "off-site" within the Park.

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Chapter 4.9 – Land Use and Population and Housing

- *Impact 4.9-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Based on the analysis below, the impact is less than significant.*

  - CSP disagrees with the analysis of *impact 4.9-2*, and requests that this impact be changed to *potentially significant* based on the following conflicts with regional, local and statewide land use plans, policies and regulations:

    - Nevada County General Plan, Volume 1 Goals, Objectives, Policies, & Implementation Measures
      - *Safety Element - Goal FH-10.3 Reduce the potential for injury, property damage, and environmental damage from flooding.*
        - *Policy FH-10.3.2*
          - ***Avoid increases in downstream flooding potential by protecting natural drainage** and vegetative patterns through project site plan review, application of Comprehensive Site Development Standards, use of clustered development and project subdivision design. The Comprehensive Site Development Standards shall include measures applicable to all discretionary and ministerial projects to **avoid downstream flooding resulting from new development.** Such measures, shall include, but not be limited to:*
            a. Avoidance of stream channel modifications; and
            b. Avoidance of excessive areas of impervious surfaces; and c. Use of on-site retention or detention of stormwater.
      - *Water Element - Goal 11.1 Identify, **protect and manage for sustainable water resources and riparian habitats**.*
      - *Mineral Management - Goal 17.1 Recognize and protect valuable mineral resources for current and future generations in a manner that **does not create land use conflicts**.*
        - *Policy 17.11*
          - *Recognize the importance of water conservation and quality for the present and future needs of the County by: a. Requiring the conservation of on-site water during mining operations; b. Requiring that off-site water discharge complies with State water quality standards; and **c. Requiring that any increase or decrease of off-site discharge is not detrimental to the downstream environment or downstream water users**.*

    - CA Water Code § 13050 section (f) states: "'**Beneficial uses**' of the waters of the state that may be protected against quality degradation include preservation and enhancement of fish, wildlife, and other aquatic resources or preserves.
      - (d) "**Waste**" includes sewage and any and all other waste substances, **liquid**, solid, gaseous, or radioactive, associated with human habitation, or

Agcy 1-46

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of human or animal origin, or **from any producing, manufacturing, or processing operation**, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.

- (1) **Beneficial uses to be protected.**
- (l) (1) **"Pollution" means an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects either of the following: (A) The waters for beneficial uses."**

The Central Valley Regional Water Quality Control Board established in their 2018, Sacramento and San Juaquin Basin Plan that "**Fish, plants, and other wildlife, as well as humans, use water beneficially"** (Page 2-1, Beneficial Uses, California Regional Water Quality Control Board, Central Valley Region, (RWQCB), 2018), and that existing "Beneficial Uses" of the Bear River Watershed which includes South Fork Wolf Creek are "Wildlife Habitat" and "Cold and Warm Freshwater Habitat" (page 2-10, RWQCB).

These land use policies conflict with the Project's proposal to discharge mine water into the South Fork Wolf Creek and contribute to increased turbidity / sedimentation. The Project's mine dewatering plan would also significantly alter the downstream immediate riparian ecosystem with unknown consequences for amphibians, riparian trees, benthic macroinvertebrates and sensitive vegetation communities, especially considering the proposal to alter flows up to 5.6 cfs at any time within the next 80 years.

Chapter 4.10 – Noise and Vibration

- *Existing Sensitive Receptors, Page 4.10-4*

Agcy 1-47

CSP pointed out in our "General Comments" that the Park has been neglected to be included as a "sensitive receptor" in evaluation and analysis of Noise and Vibration impacts on the recreational users, park employees/residents, and wildlife resources within the nearest locations to both the Brunswick and Centennial facilities. CSP has noted though that Sensitive Receptor #8 on *Figure 4.10-2 Representative Sensitive Receptors* is located at the eastern border of the Bennett Street Grasslands and just outside the Park. CSP has little ability to evaluate and analyze potential noise and vibration impacts along the Union Hill trails within the Park, with the nearest Sensitive Receptor #30 located several hundred feet away, albeit closer in location to the Brunswick facility. The "Upstream Reach" of Park land located on East Bennett Road is nearby to Sensitive Receptor #9. Sensitive Receptor #9 has been identified as having a ***Daytime Noise Criteria Exceeded*** in *Table 4.10-11 Predicted Construction Noise Levels at Nearest Receptors*. Wildlife existent at the "Upstream Reach" will therefore be impacted by excessive noise and CSP is concerned about how this impact will affect wildlife health.

- *Impact 4.10-1 Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to initial construction activities. Based on the analysis below, even with the implementation of mitigation, the impact would be considered significant and unavoidable.*

Agcy 1-48

  - CSP notes that this *significant and unavoidable* impact would affect Park lands in the "Upstream Reach" area adjacent to East Bennett Street nearby to Sensitive Receptor #9 which is unfortunate and may impact wildlife resources health, breeding, and foraging habits. Black bear, deer, amphibians, reptiles, and numerous avian species, which may include sensitive species are known from this area of the Park.

Chapter 4.13 – Wildfire

As owner, operator and manager of Empire Mine State Historic Park, wildfire potential within the region and nearby to the Park is of the utmost concern to CSP. Protecting natural and cultural resources, park recreational visitors, park employees/residents, and park infrastructure from the effects of wildfire, the health effects of wildfire smoke, is of the greatest interest to CSP. Although not fully evaluated within *Chapter 4.13* the Project proposed to install two 12,000 gallon diesel tanks, and use numerous flammable chemicals and explosives daily during both construction and operational phases. These Project constituents are inherently hazardous and can exacerbate wildfire potential if improperly handled and / or released. CSP recognizes that most of these issues were analyzed and evaluated within *Chapter 4.7 Hazards and Hazardous Materials*, but the relation to wildfire danger and potential is inherent to this chapter.

Agcy 1-49

Fuel Treatment Efforts

  - CSP notes that *Figure 4.13-2 Active, Completed, and Planned Fuel Treatment Projects* is missing fuel treatments that have occurred in the Union Hill area of Empire Mine State Historic Park from 2014-2021. This area of Union Hill is directly west uphill of the Brunswick facility and is located 450 feet away from the Brunswick boundary.

- *Impact 4.13-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Based on the analysis below, and with implementation of mitigation, the impact is less than significant.*

Agcy 1-50

  - CSP notes both erroneous and speculative information on groundwater depletion in relation to plant community health and uptake of water in the discussion following: *Impact 4.13-2. Page 4.13-21* states: "In the areas away from the creeks and valleys, the depth to groundwater is typically greater than 10 feet and, in many cases, may be 100 feet or more. In addition, the normal seasonal fluctuation in the depth to groundwater may be 10 feet to 30 feet or more. Thus, in the areas away from the creeks, the existing groundwater surface is below the typical depth of rooted vegetation

and tap roots from trees, especially during the drier months when the depth to groundwater is at its greatest."

- CSP has noted that this information contradicts *Footnote 8* in *Appendix K.2*: "The most common tree in the project area is the Ponderosa Pine, with tap roots up to 36 feet deep, which is considered one of the deepest tap root systems among conifer trees. The second most common tree in the project area is the Incense Cedar, with tap roots up to 20 feet deep but averaging six to seven feet deep. Other trees in the area include the Douglas Fir, with tap roots up to 10 feet deep, and the California Black Oak, with tap roots three to four feet deep (Greg Matuzak, personal communication, October 24, 2020 electronic mail message to Ben Mossman, Rise Gold)."
    - CSP notes that ponderosa pine and incense cedar are the two most common tree species at the Park and are located in abundance throughout Union Hill area, which is nearest to the greatest groundwater potential drawdown areas. If these tree species are known to have tap roots from 20-36 feet deep, then these tree roots have great potential to be within the groundwater zone of "typically greater than 10 feet and, in many cases, may be 100 feet or more" even while being located "away from the creeks and valleys". CSP also notes that there is no reference or scale given to support the theory that groundwater is "typically greater than 10 feet and, in many cases, may be 100 feet or more" in areas away from valley and creek bottoms. CSP cannot evaluate impacts to vegetation based on speculation without reference.

Agcy 1-51

- CSP also notes the following paragraph on *Page 4.13-21* states: "Discharge of treated water to South Fork Wolf Creek would prevent the lowering of the groundwater levels along the reach of that creek because the full dewatering volume would be discharged to the creek, whereas only a small fraction of the groundwater that was removed from the subsurface would come from that area. Thus, the potential increased recharge due to the enhanced base flow in South Fork Wolf Creek would more than offset any effects from dewatering in the area near the creek."
    - CSP finds that this information supports the notion that only the immediate riparian area along South Fork Wolf Creek would receive groundwater recharge from extra mine dewatering. CSP believes this still leaves vegetation communities within the valley bottom, but away from the creek especially vulnerable to artificial groundwater depletion. Many of these vegetation communities exist at the Bennett Street Grasslands within the Park and may be potentially affected by groundwater depletion however minimal it may be. Vegetation communities drying out sooner not only threatens their long-term survival during the summer drought but can contribute to lower humidity levels within the plants and therefore higher flammability and ignition potential.

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Agcy 1-52

CSP also notes that the information on groundwater depletion in relation to the health of plant communities and tree survival was left out of *Chapter 4.8 Hydrology and Water Quality*. CSP noted within the comments to *Chapter 4.8* that evaluating impacts to vegetation communities due to groundwater depletion was of high concern for the Park in relation to "*Impact 4.8-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Based on the analysis below, with the implementation of mitigation the impact is less than significant.*"

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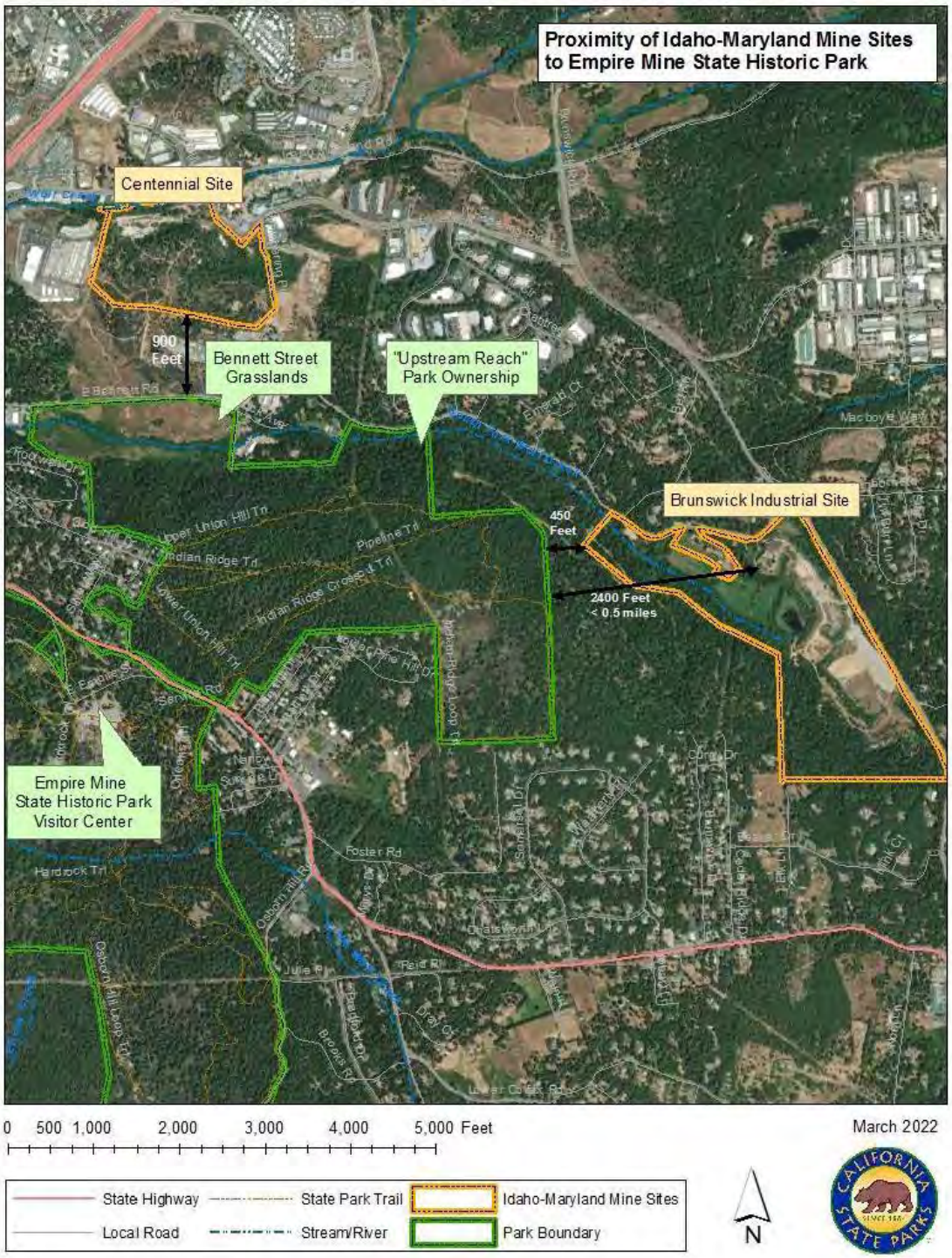

AGENCY LETTER 1: DANIEL LUBIN, CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

Response to Comment Agcy 1-1

The commenter provides a description and information regarding the Empire Mine State Historic Park. Comment noted.

The commenter requested it be noted that an undisturbed historic "sulphurette works" is located on the "upstream Reach" of the Park, located 0.4-mile downstream of the Brunswick site on South Fork Wolf Creek but does not provide any information as to why this is relevant to the analysis of the DEIR. The comment is noted.

Response to Comment Agcy 1-2

The commenter states that the DEIR is inadequate in mitigations and several sections are unclear as to what the potential impacts may be. The commenter states that the project could affect the natural resources, recreational values, health and safety of Park visitors and employees and the general well-being of the Park, but does not provide specific examples in this comment. Responses to specific comments are provided below.

Response to Comment Agcy 1-3

The commenter believes that the project and the impacts and mitigations in the DEIR fail to adequately protect the South Fork of Wolf Creek, its riparian ecosystem, and its "Beneficial Uses". Specifically, the commenter asserts that the proposal to add 1.5 to 5.6 cfs to South Fork Wolf Creek threatens the riparian ecosystem, plant communities, benthic macroinvertebrates, may cause erosion and degradation of bank stability, discharge heavy metals, cause turbidity, and harm aquatic habitat and amphibians. The commenter asserts that the project conflicts with Policy 17.11 of the Nevada County General Plan due to increase in offsite water discharge to South Fork Wolf Creek which could be extremely detrimental to the downstream environment and water users of which include wildlife and riparian streams. Please see Master Responses 32 - Temperature of Mine Water Discharge, 33 - Groundwater Dependent Vegetation, 34 - Resident Fish, 35 - Discharge to South Fork Wolf Creek, 36 - Flows in South Fork Wolf Creek, 38 -Foothill Yellow Legged Frog and California Red Legged Frog, and Response to Comment Grp 31-12 regarding benthic macroinvertebrates.

Response to Comment Agcy 1-4

The commenter states that the Park users have been neglected to be considered a sensitive receptor regarding air quality. Please see Response to Comment Agcy 1-6.

The commenter states that the Park users have been neglected to be considered a sensitive receptor regarding noise. Please see Response to Comment Agcy 1-47 and Agcy 1-48.

Response to Comment Agcy 1-5

The commenter states that the CSP owns a large section of the free-flowing stretch of South Fork Wolf Creek downstream of the project. Comment noted.

The commenter requests extensive revisions to the DEIR to add discussions of the Empire State Historic Park. A revision to page 4.3-11 has been made to the DEIR (see Response to Comment Agcy 1-6) as reflected in the Final EIR. In addition, maps have been prepared that depict cancer and non-cancer health risk isopleths to clarify the location of the park and modeled health risk. Please see Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K. The park boundaries have been added to Sheet 16 which is attached to the Final EIR as Appendix L.

The Bennett Street Grasslands are discussed in Master Response 33 - Groundwater Dependent Vegetation. No other revisions regarding the Empire State Historic Park are required for the analysis of the DEIR.

Response to Comment Agcy 1-6

The commenter asserts that the air quality analysis used in the DEIR did not include parks and playgrounds in the definition of sensitive receptors and may have omitted analysis of recreational trail users on Empire Mine State Historic Park's trail system as sensitive receptors. Recreational parks have been added to the definition of Sensitive Receptors in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) on page 4.3-11:

> Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Children, pregnant women, older adults, and people with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses where sensitive-receptor population groups are likely to be located such as hospitals, schools, childcare centers, residences, and retirement homes, are considered especially vulnerable. Recreational parks and uses are also areas that may have sensitive receptor visitors.

This definition would include the Empire Mine State Historic Park. Notably, however, based on proximity to the project, predominant wind direction, and duration of exposure, the maximally exposed individual described in the Health Risk Assessment (HRA), located north of the project site at UTM coordinates 671091 meter Easting /4342277 meters Northing (see page 27 of HRA included in Appendix E.1 of the DEIR) would not change.

Response to Comment Agcy 1-7

The commenter asserts that the DEIR did not properly assess silica exposure to sensitive receptors based on the threshold values established by OEHHA, and should evaluate silica exposure from the project to Empire Mine Park users and employees. OEHHA has established a chronic (i.e., long-term) reference exposure level (REL) for Crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter). According to OEHHA's *Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments* (2015) (OEHHA's Guidelines):

> A REL is the concentration level at or below which no adverse non-cancer health effects are anticipated for the specified exposure duration. RELs are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature. RELs are designed to protect the most sensitive individuals in the population by the inclusion of factors that account for uncertainties as well as individual differences in human susceptibility to chemical exposures. The factors used in the calculation of RELs are meant to err on the side of public health protection in order to avoid underestimation of non-cancer hazards. Exceeding the REL does not automatically indicate an adverse health impact. However, increasing concentrations above the REL value increases the likelihood that the health effect will occur.

As discussed on page 4.3-79 and shown in Table 4.3-21 of the DEIR, the threshold of significance for chronic exposure is a Hazard Quotient of 1. The Chronic Hazard Quotient is equal to the annual average concentration at the receptor location divided by the Chronic REL. To determine if TACs exceed the Chronic Hazard Quotient, the annual mass emissions (in tons per year) of each applicable TAC, including silica, were converted to substance-specific emission rates (in grams/second) and then to annual average concentrations by multiplying the substance-specific emission rate by the "Chi over Q" ("X/Q") value estimated by the AERMOD dispersion model. As described in the Health Risk Assessment prepared for the project (Appendix E.1 of the EIR), "A

unit emission rate (1 gram per second [g/s]) was normalized over each unique source of emissions for the AERMOD run to obtain the "X/Q" values. X/Q is a dispersion factor that is the average effluent concentration normalized by source strength, and is used as a way to simplify the representation of emissions from many sources." Based on these calculations, the Health Risk Assessment prepared for the project determined that the health risk to the maximally exposed sensitive receptor would be below the Hazard Quotient threshold and would result in a less than significant impact. In addition, maps have been prepared that depict cancer and non-cancer health risk isopleths to clarify the location of the park and modeled health risk, as further described below.

Several commenters requested visual representations of the results of the Health Risk Assessment (HRA) prepared for the project and attached to the DEIR as Appendix E.1. Based on public comments asking for visual exhibits and for more detail on exposure to workers, Dudek prepared a supplemental HRA ("Dudek Memo") to assess potential for impacts to workers near the project sites, and also to include visual representations of the residential receptors identified in the original HRA used in the DEIR's analysis. Please see Appendix K to this Final EIR for the Dudek Memo.

The Dudek Memo identifies the worker receptors shown on Exhibits A through D based on the supplemental HRA, but also includes the residential receptors, based on data from the original HRA used in the DEIR. There are no residential receptors in the proximity of the Centennial Industrial Site, so no residential receptors are indicated on the exhibits. The locations of residential and worker receptors are annotated on Exhibits A through D of the memo. In the case of the calculated worker health risk, no isopleths are shown at the Centennial Industrial Site because there is no location on-site or off-site where health risk exceeds a level of significance. The health risk to the maximally exposed individual worker (MEIW) is calculated in the memo. The MEIW is shown on Exhibit D and is located north of the Centennial Industrial Site. As described in the memo, all project emissions, including trucks, off-road equipment, underground/blasting/crushing, ore processing, fuel tank storage, backup diesel generators, and material handling, were incorporated into the worker HRA.

As shown in Table 1 of the Dudek Memo, the unmitigated and mitigated incremental cancer risk at the MEIW of 0.4 in 1 million (assuming exposure starts at age 16) from project construction and operation would not exceed the NSAQMD threshold of 10 in 1 million. The unmitigated and mitigated chronic hazard index would be 0.4 and 0.4 at the MEIW, respectively, which would be below the NSAQMD threshold of 1.0. The unmitigated and mitigated acute hazard index would be 0.04 and 0.04 at the MEIW, respectively, which would be below the NSAQMD threshold of 1.0.

Response to Comment Agcy 1-8

The commenter asserts that it could not find information in the DEIR related to the threshold values for exposure to metal in dust emissions, and therefore cannot assess risks to park employees and visitors. Metal content of dust emissions are considered in the Health Risk Assessment prepared for the project based on sampling and material ratios presented in Section 4.4 of Appendix K.2 to the DEIR. Metals can have cancer and/or non-cancer health risk, and both types of risk were assessed in the DEIR. As described in the Health Risk Assessment for the project:

> In March 2015, the OEHHA approved the 2015 Risk Assessment Guidelines Manual (OEHHA 2015) [termed the "OEHHA Guidelines" in these response to comments]. The construction and operational HRA was prepared following the 2015 Risk Assessment Guidelines Manual. Cancer and noncancer health risk calculations were performed for the project using ground-level unity emission concentration (X/Q) input from AERMOD. This

> modeling established the emissions dispersion field to the existing sensitive receptors from atmospheric influence of the stationary source emissions. Plot files generated in AERMOD were then imported into HARP2, with ground level concentrations determined by multiplication of emission rates and X/Q values for each source of emissions. HARP2 then assessed resulting cancer and noncancer risk at the existing receptors from exposure to TAC emissions using the OEHHA derived calculation method.

This Health Risk Assessment methodology described above is important since the commenter's requested "exact threshold values for each of the above state heavy metals" are automatically incorporated into the California Air Resources Board HARP2 model, which was used to determine the resultant health risk impacts of the project. These values are based on the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* (last updated in 2020)[1], which the commenter can review if they would like each of the heavy metal health values. Notably, however, the Health Risk Assessment used conservative assumptions of metal content in fugitive dust and concluded that the exposure to the maximally exposed sensitive receptor would be less than relevant thresholds for cancer health risk and chronic health risk. In addition, maps have been prepared that depict cancer and non-cancer health risk isopleths to clarify the location of the park and modeled health risk. The health risk to existing worker receptors was calculated in order to plot the isopleths for the Centennial site, which is surrounded by worker receptors rather than residential receptors. Please see Response to Comment Agcy 1-7 and the Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K. As shown in Exhibits A through D, the isopleths of significant health risk are not within or near the park boundaries and park users would not be subject to significant health risk from the proposed project. Please see Master Response 20 - Conservatism of Metals Assumptions for additional detailed information.

Response to Comment Agcy 1-9

The commenter cites to language from the DEIR that notes measures to protect underground workers from asbestos exposure under MSHA permissible exposure level (PEL) requirements would also serve to limit emissions of aboveground asbestos exposure, and questions how the PELs will limit aboveground exposure.

While the DEIR correctly points out that measures to reduce airborne asbestos particles in the underground mine will consequently reduce airborne asbestos particles emitted aboveground from the mine, the MSHA PEL is not used by the DEIR as part of the impact analysis to determine the health risk of the public from exposure to airborne asbestos. Rather, the concentrations of asbestos at receptor locations are modelled and the health risk is calculated in accordance with OEHAA guidelines. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California.

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions.

The threshold of significance for health risk from exposure to air pollutants including asbestos is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor located north of the project site at UTM coordinates 671091 meter Easting /4342277 meters Northing (see page 27 of HRA included in Appendix E.1 of the DEIR), which would receive a greater exposure than visitors or employees at the Empire Mine Park, will be below this threshold.

[1] https://ww2.arb.ca.gov/sites/default/files/classic/toxics/healthval/contable.pdf

Response to Comment Agcy 1-10

The commenter states that the DEIR does not include an adequate map disclosing the dispersion of air pollutants from the project sites. A map has been prepared to clarify the location of the park and modelled health risk. The health risk to existing worker receptors was calculated in order to plot the isopleths for the Centennial site, which is surrounded by worker receptors rather than residential receptors. Please see Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K. As shown in Exhibits A through D, the isopleths of significant health risk are not within or near the park boundaries and park users would not be subject to significant health risk from the proposed project.

Response to Comment Agcy 1-11

The commenter states that the DEIR does not include an adequate map disclosing the dispersion of air pollutants from the project sites as relates to the Empire Mine Park. A map has been prepared to clarify the location of the park and modelled health risk. The health risk to existing worker receptors was calculated in order to plot the isopleths for the Centennial site, which is surrounded by worker receptors rather than residential receptors. Please see Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K. As shown in Exhibits A through D, the isopleths of significant health risk are not within or near the park boundaries and park users would not be subject to significant health risk from the proposed project. The threshold of significance for health risk from exposure to air pollutants including asbestos is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor located north of the project site at UTM coordinates 671091 meter Easting /4342277 meters Northing (see page 27 of HRA included in Appendix E.1 of the DEIR), which would receive a greater exposure than visitors or employees at the Empire Mine Park, will be below this threshold. The commenter requests a map or grid showing the specific plumes applicable to the park area. This information is not necessary for the DEIR's analysis as it is not directly related to the threshold of significance for the health risk assessment. The maps provided in the Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K, provides sufficient detail to inform the public and the commenter regarding the project's health risk impacts

Response to Comment Agcy 1-12

The project would use polymers as a chemical stabilizer to reduce haul road dust. These chemicals are not toxic air contaminants and therefore do not require evaluation in the Health Risk Assessment. Research by the US EPA has shown that these types of dust suppressant products have minimal to no adverse impacts on water quality and aquatic life relative to the use of water alone. Please see Master Response 12 – Chemical Dust Stabilizers.

Response to Comment Agcy 1-13

The commenter expresses support for the Ozone Attainment Plan. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. Notably, the NSAQMD thresholds used for criteria air pollutants for the project are the same thresholds used by the commenter in

the Empire Mine State Historic Park Site Characterization and Remediation Draft Program EIR in 2009.[2]

Response to Comment Agcy 1-14

The commenter questions how applicant proposed emissions reduction measures can reduce emissions impacts, when those measures were already assumed as part of the "unmitigated emissions" inventory. However, the commenter's question is based on a typo in the DEIR, as the applicant proposed emission reduction measures were not actually included in the unmitigated emissions inventory. Page 4.3-73 of the DEIR had an error, which reads:

"The emission data presented in Table 4.3-17 (i.e., unmitigated emissions) reflect the reductions that would occur with implementation of APM-AQ-1 and APM-AQ-2."

The word "with" was intended to be "without". This error has been corrected in the Final EIR. The unmitigated emissions do not reflect the use of Tier 4F engines; thus, the use of Tier 4F engines does achieve a reduction in emissions as compared to the unmitigated emissions. The typo is hereby corrected on page 4.3-73 of the DEIR:

> Mitigation Measure(s)
>
> The emission data presented in Table 4.3-17 (i.e., unmitigated emissions) reflect the reductions that would occur without implementation of APM-AQ-1 and APM-AQ-2. Table 4.3-19 shows the estimated maximum daily mitigated emissions associated with construction, operation, and reclamation of the project, accounting for additional emissions reductions associated with Mitigation Measure 4.3-1(b), which would result in a reduction in construction contractors' equipment exhaust criteria air pollutants during project construction (year 2021).

The above minor change serves to clarify the DEIR text, and there is no change to the analysis in the DEIR and the impact significance conclusion from the DEIR.

Response to Comment Agcy 1-15

The commenter asserts that the project should be considered to have a significant and unavoidable impact even after mitigation, regarding Impact 4.3-1. Please see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations. As discussed in Master Response 19 - the DEIR imposes all mitigation measures required by the NSAQMD to reduce the project's impacts addressed in Impact 4.3-1 to less than significant.

Response to Comment Agcy 1-16

The commenter asserts that the DEIR contains a typo, which refers to Mitigation Measure 4.3-1[b] rather than 4.3-1(a). The commenter is correct and page 4.3-73 of the DEIR is hereby revised as follows:

> According to the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds (included as Mitigation Measure 4.3-1[~~b~~a] below) would reduce project impacts to a *less-than-significant* level during all years of project construction, operations, and reclamation.

The above minor change is for clarification purposes and does not change the analysis or conclusions in the DEIR.

[2] https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6747547984/Aug%202009%20Empire%20Mine%20Draft%20PEIR.pdf, p. 4.2-20.

Response to Comment Agcy 1-17

The commenter asserts that the project's ROG, NOx, and PM_{10} emissions should be considered "potentially significant" after mitigation; however, the commenter misunderstands the NSAQMD guidelines. The NSAQMD requires implementation of certain mitigation measures for each defined level of emissions volumes (A, B, C) to achieve an impact determination of less-than-significant impact. As stated on page 4.3-41 of the DEIR, the NSAQMD has developed a tiered approach to significance levels. The tiered thresholds for Levels A, B, and C are given in Table 4.3-5 for a project's estimated emissions of criteria pollutants in pounds per day. A project with emissions qualifying it for Level A thresholds (i.e., all projects with emissions greater than zero) requires the most basic mitigation. Projects that qualify for Level B require more extensive mitigation, and projects that qualify for Level C require the most extensive application of mitigation. If unmitigated emissions of ROG, NOx, and/or PM10 exceed 136 pounds per day (Level C), then there is a potentially significant impact and mitigation is required; if mitigated emissions of ROG, NOx, and/or PM10 still exceed 136 pounds per day (Level C) after implementation of mitigation, then a significant and unavoidable impact would occur. Unmitigated emissions below Level C would result in an impact that is potentially significant, and mitigation is required; following implementation of mitigation (as specified separately for Level A and Level B by NSAQMD), emissions would be less than significant. The DEIR imposes the NSAQMD recommended mitigation measures for the project's ROG, NOx, and PM_{10} emissions, and therefore achieves a less than significant impact, per NSAQMD guidance. (DEIR, p. 4.3-73.) Notably, the NSAQMD thresholds used for criteria air pollutants for the project are the same thresholds used by the commenter in the Empire Mine State Historic Park Site Characterization and Remediation Draft Program EIR in 2009.[3] While the commenter asserts that emissions meeting NSAQMD level B thresholds should be considered "potentially significant" after mitigation, the commenter's 2009 EIR stated that the park project's NOx emissions, which were shown to meet NSAQMD level B thresholds, were "less than significant" after implementation of standard dust control mitigation, similar to the standard mitigation used in the project's DEIR. (See Empire Mine State Historic Park Site Characterization and Remediation Draft Program EIR, pp. 4.2-31 to 4.2-35.) In the Park's EIR, the analysis also relied on the standard NSAQMD mitigation and rules to conclude that emissions impacts would be less than significant, when stating as follows: "To ensure that criteria pollutant emissions are less than significant, the Project Proponents will comply with all applicable NSAQMD and State Rules and Regulations (where applicable) during the execution of Project Actions." (Id. at 4.2-34.) As such, the project's DEIR follows the same methodology for implementation of the NSAQMD's Guidelines For Assessing And Mitigating Air Quality Impacts Of Land Use Projects as was used by the commenter for its own EIR in 2009. Importantly, the DEIR's implementation of the NSAQMD's thresholds is consistent with NSAQMD guidance and implementation of those thresholds by the County on other projects.

Response to Comment Agcy 1-18

The commenter notes that some of the NSAQMD recommended mitigation measures would not achieve emissions reductions because they are designed for different types of land use projects as compared to an underground mine. The commenter then states that given the mismatch of some of the NSAQMD mitigation measures, the County should require other more project-specific mitigation measures. The DEIR already imposes Mitigation Measure 4-3-1(b), which requires a Construction Exhaust Emissions Minimization Plan that requires the use of Tier 4 Final engines or alternative sources of power. This mitigation measure is, as suggested by the commenter, a

[3] https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6747547984/Aug%202009%20Empire%20Mine%20Draft%20PEIR.pdf, p. 4.2-20.

measure that is project-specific and beyond the standard measures required by the NSAQMD. The mitigated emissions identified in the DEIR reflect the lower emissions that would be achieved by this mitigation measure. Please see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations. Also see Response to Comment Agcy 1-17.

Response to Comment Agcy 1-19

A map has been prepared to clarify the location of the park and modelled health risk. Please see Dudek Memorandum HRA Isopleths included in the Final EIR as Appendix K. The park boundary is not within, nor close to, the 10 per million cancer risk isopleth which is the boundary for the threshold of significance for health risk. The health risk assessment used in the DEIR already analyzed the health impacts of toxic air contaminant exposure to a maximally exposed individual resident (MEIR) who is much closer to the project site, located north of the project site at UTM coordinates 671091 meter Easting /4342277 meters Northing (see page 27 of HRA included in Appendix E.1 of the DEIR) and would therefore receive higher exposure than the Empire Mine visitors and employees. The air quality analysis prepared for the DEIR found that the MEIR would not be subject to a chronic hazard quotient of 1.0 or greater, and would not be subject to a 10 per million cancer risk, so no significant health impact related to air pollutant exposure is reasonably anticipated at the Empire Mine Park for visitors or employees. Note that the toxic air contaminants contained in particulate matter (PM_{10}) emitted by the project's activities are considered in the Health Risk Assessment.

As discussed on page 4.3-2 of the DEIR, pollutants for which ambient air quality standards (AAQS) have been established are called "criteria" pollutants. Criteria pollutants are listed in Table 4.3.1 of the DEIR. NOx and PM_{10} are criteria air pollutants. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. The project complies with the thresholds set by the NSAQMD, applies all required mitigation measures, and therefore would not cause significant health impacts at the Empire Mine Park due to criteria pollutants.

Response to Comment Agcy 1-20

The commenter expresses concern with health impacts to Empire Mine Park visitors and employees relating to toxic air contaminant and criteria air pollutant emissions from the project, and also asserts that APM-AQ-2 has been factored into the pre-mitigation emissions values in Table 4.3-17 of the DEIR. As discussed in Response to Comment Agcy 1-14 above, the DEIR contains a typo which states that Table 4.3-17 of the DEIR already includes application of APM-AQ-2; however, that table representing unmitigated emissions actually does not include application of APM-AQ-2. That typo has been corrected in the Final EIR.

Further, as discussed on page 4.3-2 of the DEIR, pollutants for which ambient air quality standards (AAQS) have been established are called "criteria" pollutants. Criteria pollutants are listed in Table 4.3.1 of the DEIR. NOx is a criteria air pollutant. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse

effects to human health related to criteria pollutant emissions. Accordingly, these impacts are properly considered less than significant after implementation of mitigation. (DEIR, p. 4.3-73.)

Response to Comment Agcy 1-21

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, and Master Response 37 - Birds and Raptors, regarding potential impacts to these species. In addition, please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Agcy 1-22

Please see Master Response 37 - Birds and Raptors, regarding potential impacts to the Willow Flycatcher. Please see Master Response 33 - Groundwater Dependent Vegetation, regarding dewatering impacts to riparian zones. Noise and vibration impacts to species was analyzed in DEIR Section 4.4.4, Impact 4.4-2, and considered less than significant.

Response to Comment Agcy 1-23

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. Since publication of the DEIR, a second Foothill Yellow Legged Frog survey was conducted which did not identify any special status amphibian species.

Response to Comment Agcy 1-24

As discussed on page 4.8-45 of the DEIR, during mining, groundwater inflow into the underground workings would require dewatering. The dewatering would continue at a rate equal to the groundwater inflow into the mine, ranging from approximately 500 gpm to 1,200 gpm seasonally and averaging approximately 850 gpm or about 1.9 cfs. The maximum discharge rate permitted would be 2,500 gpm or 5.6 cfs, which would allow flexibility for unexpected seasonal inflows, operational issues. These fluctuations are substantially less than fluctuations resulting from seasonal storm events and NID discharge (see Appendix K.1 and K.2 of the DEIR). Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Regarding the Foothill Yellow Legged Frog see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Agcy 1-25

Please see Response Agcy 1-24 above.

Response to Comment Agcy 1-26

Noise and vibration impacts to species was analyzed in DEIR Section 4.4.4, Impact 4.4-2, and considered less than significant. The commenter requests a specific noise impact study on wildlife but does not provide any specific reasoning or evidence disputing the conclusions in the DEIR. It should be noted, Brunswick Industrial Site increases in daytime and nighttime ambient noise level increases do not extend to the Empire Mine State Park (EMSP) boundary (see DEIR figure 4.10-7). Engineered fill placement at the Centennial Industrial Site is the closest project activity to the EMSP and could last approximately 6 years. The nearest receptor to the EMSP is number 8 (see DEIR Figure 4.10-3) and the closest noise and vibration measurement location is number 7 and 8 (see Figure 4.10-3). As shown in DEIR Table 4.10-12, Centennial Industrial Site engineered fill activity does not exceed existing baseline noise levels (see Table 4.10-6). As a result, wildlife

species that may use the EMSP should not experience an increase in noise levels and therefore, such impacts would be considered less than significant.

Response to Comment Agcy 1-27

Please see Response Agcy 1-24 above.

Response to Comment Agcy 1-28

Please see Response Agcy 1-24 above.

Response to Comment Agcy 1-29

The commenter states that the specific process by which explosives will be received, documented, and transferred to storage in the surface shaft is not described in the DEIR. However, a robust description of the transfer of explosives underground, and relevant regulations, is provided in Chapter 4.7 of the DEIR. More specific details are not required for the analysis of the DEIR.

The commenter believes that the quantity and frequency of explosives deliveries has not been evaluated in the DEIR and that the impact should be changed to potentially significant. The commenter states that transportation of explosives and potential for accidents, particularly as a potential source of wildfire ignition, and that they cannot understand the risks and the DEIR cannot mitigate the potential significant impact. As stated on page 4.7-24 of the DEIR, during operations, explosives would be transported to the Brunswick Industrial Site a maximum of once a week and a minimum of once every three weeks. During initial underground construction, explosives may be transported to the site more frequently. As stated on page 4.7-25 of the DEIR, the transportation of explosives in the United States has resulted in only a limited number of incidents. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries. However, as stated on page 4.7-31 of the DEIR it is already concluded that the proposed project could result in a significant impact related to the routine transport, storage, and use of explosives and mitigation measures are proposed in the DEIR to reduce the impact to a less than significant level.

Response to Comment Agcy 1-30

The commenter states that it disputes the peak flow rates during storm events which are cited in the DEIR from a 1986 report by Cranmar Engineering. This information was provided by the City of Grass Valley to the applicant during the preparation of the Use Permit application. The calculations used by the City of Grass Valley for their Storm Drainage Master Plan have not been confirmed nor are required to be evaluated in the analysis presented in the DEIR. However, based on other information presented in the DEIR, the Cranmar Engineering report's estimated magnitude of peak flow rates during a 10-year storm is not unreasonable. For example, as shown in Table 4.8-1 of the DEIR, the peak runoff from the Brunswick Industrial Site alone is estimated at 140 cfs during a 10-year storm. This calculation was performed by a registered civil engineer using the unit-hydrograph method consistent with Nevada County standards. The peak storm flow in South Fork Wolf Creek at the location of Empire State Park would be greater due to the larger catchment area at that location. Additionally, Balance Hydrologics, using a regional regression equation, estimated peak flow in South Fork Wolf Creek below Ophir Street (Reach F) at 350 cfs for a 10-year flood. (See page 28 of Appendix K.1). Therefore, peak flows in South Fork Wolf Creek during a 10-year storm event will be much larger than the 20 cfs theorized by the commenter.

Response to Comment Agcy 1-31

The commenter cites flow volume data observed on the South Fork Wolf Creek and theorizes that peak flows as high as 20 cfs are common every few years. The County concurs that peak storm flows of 20 cfs are expected to occur in South Fork Wolf Creek. A moderate stormflow on January 25-26, 2020, at Reach F was measured at 17.3 cfs in response to 1.25 inches of rainfall. (See page 28 of Appendix K.1). This amount of rainfall is less than a 24-hour one year storm of 3.66 inches, according to the NOAA Atlas Precipitation Frequency Estimate for Grass Valley.

https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=ca

Response to Comment Agcy 1-32

The County agrees with the commenter that "Reach D" of South Fork Wolf Creek is within the boundaries of Empire State Park. The commenter correctly states that Figure 4.8-25 of the DEIR does not include a portion of the Empire Mine State Historic Park where the Bennett Street Grasslands are located. However, this figure is reproduced from Figure A-1 of the Geomorphic Assessment (Appendix K.1) and shows a historic overlay prior to the addition of the "Bennett Street Grasslands" to the Park, which explains the discrepancy noted by the commenter. The park boundaries as shown on that map merely reflect the boundaries at the time the historic overlay was created, and do not impact the analysis of the Geomorphic Assessment. Accordingly, the revision of this figure is not necessary.

Response to Comment Agcy 1-33

The commenter expresses appreciation for a DEIR excerpt explaining the Clean Water Act, and notes that a limited threat discharge permit is appropriate where there will be minimal or no harm or impairment to existing beneficial users or receiving waters. Comment noted.

Response to Comment Agcy 1-34

The commenter expresses appreciation for a DEIR excerpt regarding protection of aquatic resources from water degradation. Comment noted.

Response to Comment Agcy 1-35

The commentor expresses appreciation for the overview of the Basin Plan and explanation of beneficial uses provided in the DEIR. Comment noted.

Response to Comment Agcy 1-36

The commenter asserts that the project would conflict with Nevada General County Plan Policy FH-10.3.2 which states "avoid increases in downstream flooding potential by protecting natural drainage" due to the proposed release of 5.6 cfs of water. However, the project would not increase downstream flooding potential because of the proposed onsite detention pond; therefore, no increase in flooding potential is expected.

As stated on Page 4.8-70 of the DEIR, At the Brunswick Industrial Site, a detention basin would be constructed at the downstream toe of the engineered fill placement slopes, above South Fork Wolf Creek. The detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site.

During larger storm events, the proposed detention pond on the Brunswick Industrial Site would reduce the peak flows within South Fork Wolf Creek by much more than 5.6 cfs, as shown in Table 4.8-4. Thus, under project conditions, the overall peak storm flows would be lower than they are under existing conditions, resulting in less potential for erosion and sediment transport than

under existing conditions. (See page 75 of the DEIR). As such the project would not conflict with Nevada General County Plan Policy FH-10.3.2.

Response to Comment Agcy 1-37

The commenter states that the DEIR does not include discussion of oil, grease and silt traps for the Brunswick site in connection with General Plan Policy 11.6A, Water Element – Goal 11.1. As stated on page 4.8-81 of the DEIR, industrial sites are required to have ongoing Industrial permits with the RWQCB that provide permanent water quality protection. Any new projects with Use Permits or Development Permits are required to record a stormwater maintenance covenant on their property prior to operations in conformance with General Plan Policy 3.19C. This provides a legally enforceable mechanism for long-term storm water facility maintenance. If the projects are one-acre or larger, they are also required to provide oil, grease and silt traps on the property pursuant to GP Policy 11.6A. These traps are maintained by the aforementioned storm water facility maintenance covenant.

The commentor states that a detailed Industrial Stormwater Pollution Prevention Plan is required as part of the DEIR. However, the details of this plan are not available because it must be approved by the Central Valley Regional Water Control Board as required in Mitigation Measure 4.8-1(c). The DEIR requires the project site to obtain a SWPPP; however, a SWPPP is submitted after project approval before operations begin, not for review during the CEQA process. Engineering level detail, such as this would be provided in the SWPPP, is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Agcy 1-38

The commenter asserts that the project's discharge to South Fork Wolf Creek may be detrimental to the downstream environment or water users. Please see Response to Comment Agcy 1-36. As documented in the DEIR, the peak flood flows within South Fork Wolf Creek under the project would actually be less than current baseline flows due to the detention basin at the Brunswick Industrial Site (see page 4.8-70 of the DEIR). Please see Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Agcy 1-39

The commenter states that it cannot assess the impact of groundwater depletion within the Empire Mine Park because figures are not included in the DEIR to illustrate the impact. Additionally, the commenter requests a separate impact evaluation for groundwater depletion relating to riparian forests, plant communities and ecosystems. This separate evaluation is not required because groundwater drawdown from mine dewatering would not affect riparian forests or plant communities and ecosystems, including those present inside the Empire Mine Park boundaries. Please see Master Response 33 – Groundwater Dependent Vegetation. Nonetheless, to clarify that groundwater drawdown induced from the mine would not impact groundwater dependant (phreatophytic) vegetation, Itasca Denver prepared a memo showing the simulated drawdown in selected meadows. These three meadows (Brunswick site, Empire Mine Park, and Loma Rica) would experience minimal drawdown, even without consideration of the minewater discharge to South Fork Wolf Creek. The Empire Park Meadow would experience no drawdown with the addition of 1.9 cfs (average maintenance dewatering rate) and less than 1 inch of drawdown with no added flow from mine dewatering. (See Itasca Memo – Simulated Drawdown of Selected Meadows attached to the Final EIR as Appendix H). If the addition of mine water discharge were considered, there would likely be even less impact. As such, these impacts are less than significant.

The park boundaries have been added to Sheet 16, as shown in Appendix L to the Final EIR.

Response to Comment Agcy 1-40

The commenter proposes additional water level monitoring wells within the Empire Mine Park, the Upstream Reach and within the Bennett Street Grasslands. However, the locations proposed for groundwater monitoring in this comment are in areas where the projected drawdown due to dewatering would be substantially less than normal seasonal fluctuations, and where discharge of treated water would more than offset any potential drawdown due to dewatering. Please see Response to Comment Agcy 1-39 and refer to Sheet 16 attached to the Final EIR as Appendix L. Please also see Itasca Memo – Simulated Drawdown of Selected Meadows, attached to the Final EIR as Appendix H. No significant impact due to dewatering is expected in the Empire Mine Park area, given the existing seasonal fluctuations, low level of drawdown and increased flow in the creek; therefore, monitoring wells within this area is not required.

Response to Comment Agcy 1-41

An analysis of groundwater drawdown, which includes the area in the boundaries of the park, has already been conducted (see Appendices K.2 and K.3 of the DEIR). Please see Response to Comments Agcy 1-39 and 1-40. Please also see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Agcy 1-42

The commenter disagrees with the DEIR's conclusion that the threshold of bedload sediment mobility is 23 cfs, but seems to agree that bedload sediment mobility in South Fork Wolf Creek is above 17.3 cfs. This comment infers that the project would add 5.6 cfs to winter storm event flows. Please see Response to Comment Agcy 1-36. The detention basin at the Brunswick Industrial Site would reduce peak storm flows in South Fork Wolf Creek by more than 5.6 cfs.

As stated on page 4.8-69 of the DEIR, the analysis is to determine whether the project would result in substantial erosion or siltation. Calculations conducted by Balance indicate that bed sediment becomes mobilized at approximately 20 cfs in reaches of South Fork Wolf Creek that are susceptible to bed mobility. Filed measurements at streamflows up to 17.3 cfs in South Fork Wolf Creek showed no active bedload transport. Balance Hydraulics concluded that the threshold for causation of substantial erosion or sedimentation is greater than 23 cfs. (See page 39 of Appendix K.1.) As the detention basin at the Brunswick Industrial Site would reduce peak storm flows by more than 5.6 cfs, and non-storm flows would remain below even the commenter's suggested lower 17.3 cfs threshold, no significant impacts related to erosion or flooding are expected.

Response to Comment Agcy 1-43

The threshold for causation of substantial erosion or sedimentation is greater than 23 cfs. Please see Response to Comment Agcy 1-42.

This comment implies that the project would add 5.6 cfs to winter storm event flows. Please see Response to Comment Agcy 1-36. Rather than add to peak flows during storm events, the detention basin at the Brunswick Industrial Site would reduce peak storm flows by more than 5.6 cfs.

Response to Comment Agcy 1-44

The commenter asserts that the project's proposed discharge of up to 5.6 cfs of water to South Fork Wolf Creek would have a significant effect on turbidity in South Fork Wolf Creek. The commenter cites existing turbidity measured by Balance as evidence that the 5.6 cfs could increase turbidity, but the cited turbidity observations represent baseline conditions and do not point to a potential impact.

Mitigation Measure 4.8-1(a) requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. Water quality standards include total suspended solids and turbidity. Therefore, mine water discharge will not be turbid.

As stated on page 54 of Appendix K.2, turbidity values were also higher in the upstream location, at the proposed treated water discharge point, than they were at the downstream location. This finding suggests that there are existing sources of fine sediment located upstream of the proposed discharge location and additional runoff that enters South Fork Wolf Creek as the flow moves downstream tends to dilute the turbidity from upstream. As shown in Table 3-10 of Appendix K.2, turbidity at Reach B was 79 NTU at 9.7 cfs flow and at Reach F was 48 NTU at 17.3 cfs. As demonstrated by the data, the increase in flow, similar to the maximum proposed discharge, past the proposed discharged point (Reach B) decreased turbidity. As such, the data provided in the DEIR suggests that the maximum 5.6 cfs discharge into South Fork Wolf Creek, which will meet basin plan turbidity standards as required by the RWQCB, will dilute turbidity caused by upstream sources rather than add turbidity to the creek.

Response to Comment Agcy 1-45

The commenter requests that Impact 4.8.3 be revised to reflect that the project will result in significant turbidity impacts. As stated on page 4.8-69 of the DEIR, the analysis considers whether the project would result in substantial erosion or siltation, not merely the presence of any turbidity. Please see Response to Comment Agcy 1-42. As demonstrated by the data, the increase in flow, similar to the maximum proposed discharge, past the proposed discharged point (Reach B) decreased turbidity due to dilution of turbid water from upstream sources. Please see Response to Comment Agcy 1-44. Additionally, contrary to the commenter's assertion, peak storm flows would be lower than they are under existing conditions due to the construction of a storm water detention pond, resulting in less potential for erosion and sediment transport than under existing conditions during storm events. (See Response to Comment Agcy 1-36).

Response to Comment Agcy 1-46

The commenter suggests that the DEIR is incorrect in concluding that the project is consistent with the Nevada County General Plan, the California Water Code and the Sacramento and San Joaquin Basin Plan with regard to flooding potential, sustainable water resources and riparian habitats, land use conflicts, detrimental increase in off-site discharge, impacts to beneficial uses due to pollution, and impacts to the ecosystem due to increased turbidity and sedimentation. The commenter generally alleges that the project would conflict with the cited policies and laws, but does not specify how the project would conflict with each policy or law.

With regard to the policies addressing downstream flooding, the project would not increase downstream flooding impacts and would actually reduce peak storm flows due to the construction of a detention pond. Please see Response to Comment Agcy 1-36.

Further, the DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measure 4.8-1(a) to address these potential impacts. This mitigation measure requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals.

Groundwater drawdown from proposed mine dewatering would not impact groundwater dependent vegetation (riparian trees or sensitive vegetation communities); please see Master Response 33 - Groundwater Dependent Vegetation. As discussed in Appendix F.10, increased flows up to 5.6 cfs will not significantly affect amphibians or benthic macro invertebrates. Please see Master Response 36 - Flows in South Fork Wolf Creek.

Response to Comment Agcy 1-47

The commenter states that the Empire Mine Park should be considered a sensitive receptor for the purpose of assessing noise and vibration impacts, and also states that it is concerned that noise and vibration could impact wildlife at the park. The commenter is correct that the nearest trail within the Empire Mine SHP is approximately 850 feet from the boundary of the Brunswick Site. However, the distance from that nearest trail to the proposed project's noise-generating operations within the Brunswick Site is over 2,500 feet. And while the Bennet Street Grasslands are approximately 900 feet south of the Centennial Site, the nearest trail within the Empire Mine SHP is approximately 2,250 feet from the nearest proposed noise-generating activities within the Centennial Site. Because other sensitive receptors located much closer to the noise-generating aspects of the proposed project were evaluated and determined to be less than significantly impacted by project noise generation, and noise/vibration diminish by distance form the source, it follows that more distant receptors, including the Empire Mine SHP trail network, would similarly be less than significantly impacted by project noise generation. Examination of DEIR Figures 4.10-7 and 4.10-8 indicate that both daytime and nighttime noise generation of operations at the Brunswick Site would be well below 40 dBA at the Empire Mine site. DEIR Table 4.10-4 (General Plan Noise Element Exterior Noise Limits) shows that the County's noise standard applicable to recreation use is 70 dBA L_{eq} during the hours in which the park would be open to the public (i.e., 7 am - 7 pm). Therefore, the predicted project noise level of less than 40 dBA at the park site from Brunswick operations would be more than 30 dBA below the County's noise standard applicable to recreation uses. At the portions of the Empire Mine SHP nearest to the Centennial Site, predicted daytime noise levels are 27 dBA at the grasslands and 22 dBA at the nearest trail within the park. These predicted noise levels at both locations are well below the County's 70 dBA daytime noise level standard. As a result, the Empire Mine SHP would not be adversely impacted by noise from operations at the Centennial Site. This level of noise is significantly lower than the current daytime ambient noise in the grasslands area which is estimated to be 53 decibels (L_{eq}) at receptor location #8, located on the eastern boundary of the Bennett Street Grasslands and to be 58 decibels (L_{eq}) at receptor location #9 located near the “upstream reach” of the park. See Table 6 and Figure 3 of Appendix L in the DEIR. As stated on page 4.4-74 of the DEIR, in general, wildlife species have been shown to acclimate to the noise environment in which the species resides. Wildlife species in proximity to the E. Bennett Road would be considered acclimated to noise levels associated with greater sound levels as would be created by the activities at the Centennial site.

Response to Comment Agcy 1-48

Please see Response to Comment Agcy 1-26 above. The analysis of Impact 4.10-1 in the DEIR considers the noise impact to be significant and unavoidable to human sensitive receptors and not wildlife. As shown in Figure 3 and 4 of Appendix L, Sensitive Receptor Site 9 is between ambient noise and vibration measurements sites 7 and 8. The average ambient noise (Leq) at these sites during daytime hour ranges from 54 to 59 decibels as shown in Table 1 of Appendix L and the predicted noise from the construction of the potable water pipe along E. Bennett Road is predicted to be 58 decibels at receptor site 9. This is similar to the existing ambient noise from traffic at this location. As stated on page 4.4-74 of the DEIR, studies of the effects of noise on wildlife populations have shown that while some species can be negatively affected by traffic

noise and wildlife densities are generally inversely proportional to distance from roadways, many species of wildlife are unaffected by roadway noise. In general, wildlife species have been shown to acclimate to the noise environment in which the species resides. Wildlife species in proximity to the E. Bennett Road would be considered acclimated to noise levels associated with similar sound levels as would be created by the temporary construction activities for the pipeline.

Response to Comment Agcy 1-49

The commenter states that diesel fuel storage and use of numerous flammable chemicals daily by the project was not fully evaluated in the DEIR and that these constituents are inherently dangerous and can exacerbate wildfire if improperly handled and/or released. The commenter does not provide specifics as to why the DEIR does not fully evaluate these issues. Chapter 4.7 of the DEIR analyses hazardous materials and has proposed Mitigation Measures 4-7(a) through (d) which would reduce the risk from transport, storage, and use of hazardous materials to a less than significant level. Chapter 4.13 of the DEIR discuss and analyzes wildfire risk attributable to the proposed project. Please see Master Response 6 – Wildfire Impacts.

The commenter states that fuel treatment projects that have occurred in the Union Hill area of the Empire Mine State Historic Park from 2014-2021, located 450 feet west and uphill of the Brunswick site, are not included in Figure 4.13-2 of the DEIR. This comment is noted. The inclusion of this information would not change the significance conclusions of the DEIR in regard to wildfire**.**

Response to Comment Agcy 1-50

The park boundary and elevations have been added to Sheet #16, attached to the Final EIR as Appendix L. The elevation in this area is similar to wells in the Beaver Drive area and Cedar Ridge Area (W140-W144).

As shown in Table 4-2 of Appendix K.2, the depth to water (well depth minus water column) is estimated to average between 45 ft to 78 ft. As shown in Table 4-4 of Appendix K.2, the depth to water is estimated to average 40 feet in the Cedar Ridge area. The typical seasonal water level fluctuations for wells in the Beaver Drive area (1995 Well ID 4, 6, 7, 21, 85) are approximately 25 ft as shown in the hydrographs in Appendix B of Appendix K.2.

The depth to groundwater and seasonal fluctuation in this area of the Park is therefore consistent with the description provided in the DEIR. As discussed on page 4.13-21 of the DEIR, the depth to groundwater generally mimics the topography, but the depth is greater under ridges and drainage divides and closer to the surface near creeks and valleys. In the areas away from the creeks and valleys, the depth to groundwater is typically greater than 10 feet and, in many cases, may be 100 feet or more. In addition, the normal seasonal fluctuation in the depth to groundwater may be 10 feet to 30 feet or more. Thus, in the areas away from the creeks, the existing groundwater surface is below the typical depth of rooted vegetation and tap roots from trees, especially during the drier months when the depth to groundwater is at its greatest.

As discussed in Master Response 33, it should be noted that the root depths referred to in Appendix K.2 represent extreme cases and the analysis of impact to vegetation is therefore conservative. The terrestrial vegetation in the project area, including trees present in the Empire Mine State Park, have roots depths typically less than 6 feet, which is well within the unsaturated zone above the groundwater table. Please see Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Agcy 1-51

The park boundary and elevations have been added to Sheet #16, attached to the Final EIR as Appendix L. As shown, the simulated ground water drawdown for the flat meadow area north of South Fork Wolf Creek (the "valley bottom") is outside of the 1-foot drawdown contours and would be less than 1 foot of drawdown, and therefore negligible. The Ground Water Model did not simulate recharge from the additional mine water discharge and therefore the drawdown contours shown are conservative in the area adjacent to the creek. Please see Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment 1-52

Groundwater drawdown and the impact to vegetation was discussed on pages 4.13-21 and page 4.13-21 in the DEIR. Please see Master Response 33 – Groundwater Dependent Vegetation.

Agency Letter 2

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 3
703 B STREET | MARYSVILLE, CA 95901-5556
(530) 513-0584 | FAX (530) 741-4245 TTY 711
www.dot.ca.gov/dist3

February 25, 2022

GTS# 03-NEV-2020-00215
SCH # 2020070378

Matt Kelley
Senior Planner
County of Nevada
950 Maidu Ave
Nevada City, CA 95959

Idaho Maryland Mine – Rise Grass Valley

Dear Matt:

Thank you for including the California Department of Transportation (Caltrans) in the Initial Consultation review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

Agcy 2-1

The proposed project of a combined application for a Conditional Use Permit and Reclamation Plan to re-initiate underground mining and gold mineralization processing of the Idaho-Maryland Mine within unincorporated Western Nevada County. The proposed project would be located on two properties owned by Rise Grass Valley is requesting comment on a Draft Environmental Impact Report (DEIR). The following feedback is based on the provided DEIR.

Traffic Operations – Highway Operations

Agcy 2-2

The applicant should specify if a portion of mitigation fees will be allocated for improvements at the State Route 20 (SR 20) on/off-ramps. With other future development in the area, Nevada County should continue to coordinate with Caltrans to determine appropriate solution(s) to the existing intersection at Brunswick Road and SR 174, which operates at LOS E per the Draft EIR in the SB direction on Brunswick Road in the PM peak hour.

Hydraulics

Agcy 2-3

The Watersheds areas on section 4.8 seem smaller than what the online USGS tool StreamStats found the Upper Wolf Creek and South Fork Wolf Creek at 2816 acres and 1472, respectively.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Agcy 2-4

The 566 acre difference seems to be from StreamStats including an area NW SR-49. Please clarify why is there no consolidated document of all mitigations the draft EIR states on pages 4.8-52, 4.10-37, 4.10-45, and 4.10-58.

Agcy 2-5

The 200 heavy truck trips per day for transporting mining material (See page 4.10-35 of the Draft EIR) were not analyzed for impact to Hwy 49 or local roads for the lifespan of the road structure. The roads used by these trucks could potentially decrease the lifespan of the roadways.

Agcy 2-6

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Colin Fredrickson, by phone (530) 812-5049 or via email to colin.fredrickson@dot.ca.gov.

Sincerely,

Kevin Yount

KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—East

"Provide a safe and reliable transportation network that serves all people and respects the environment"

AGENCY LETTER 2: KEVIN YOUNT, CALIFORNIA DEPARTMENT OF TRANSPORTATION

Response to Comment Agcy 2-1

This is an introductory comment and does not address the DEIR. Comment noted.

Response to Comment Agcy 2-2

As stated on page 4.12-24 of the DEIR, The Nevada County Transportation Commission, in partnership with Nevada County, Nevada City, and the City of Grass Valley, established the Regional Transportation Mitigation Fee (RTMF) program in 2001. Under the RTMF program, development impact fees are collected to help fund construction of the regional system of roads, streets, and highways needed to accommodate growth in western Nevada County. The purpose of the RTMF is to establish a uniform, cooperative program to mitigate the cumulative indirect regional impacts of future developments on traffic conditions of regional roadways in Nevada County. The fees help fund improvements needed to maintain the target LOS in the face of the higher traffic volumes brought on by new developments.

The proponent would be required to pay the required RTMF based on the total thousand square feet of buildings constructed at the specified fee at the time of construction (see Mitigation Measure 4.12-1(a)). The allocation of these funds would be allocated to projects by the RTMF. Such allocations could include State Route 20 on/off ramps; however, the allocation of these funds would depend on the projects and priorities of the RTMF.

It is also noted that Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level.

Response to Comment Agcy 2-3

Sheet 16 shows this missing area and is attached to the Final EIR as Appendix L. The area of the Upper Wolf Creek watershed on page 4.8-2 of the DEIR is hereby corrected to state the area at 2,820 acres.

> **Regional Hydrology**
>
> The project sites are located within two watershed areas. The Centennial Industrial Site is located in the Upper Wolf Creek watershed, which encompasses approximately ~~2,250~~2,820 acres upstream from the western end of the Centennial Industrial Site. The Brunswick Industrial Site is located in the South Fork Wolf Creek watershed, which encompasses approximately 1,450 acres and is upstream of a culvert where the creek passes underneath part of the City of Grass Valley.

The stated area of the South Creek Wolf Creek watershed of 1,450 acres is similar to the streamstats report from USGS. These watershed areas presented in Appendix K.2 are not used the analysis of the DEIR and therefore no other changes are required. Hydraulic analysis by Nevada City Engineering, Itasca, and Balance used the assumptions of watershed areas as stated in those technical reports.

Response to Comment Agcy 2-4

The consolidated mitigations are presented in Table 2-1, Summary of Impacts and Mitigation Measures, of the DEIR, and Chapter 4, Mitigation Monitoring and Reporting Program, of this Final EIR.

Response to Comment Agcy 2-5

The location of traffic counts used in the traffic analysis were vetted and approved by the Nevada County Public Works Department. Class and Volume counts were not conducted on SR49 or the ramps from Brunswick Road to the highway, which would allow a Traffic Index to be calculated. Furthermore, the Nevada County Traffic Impact Analysis Guidelines do not require an analysis of Traffic Index or impacts to lifespan of roadways. Truck traffic on state highway infrastructure is not an incompatible use that requires analysis under CEQA. Therefore, the analysis requested is not required for the EIR.

Response to Comment Agcy 2-6

Comment noted. Nevada County will provide the commenter with notifications regarding the proposed project.

Agency Letter 3

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
916-358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

April 4, 2022

Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley:

Subject: IDAHO-MARYLAND MINE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
SCH# 2020070378

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Availability of a DEIR from Nevada County Planning Department (County) for the Idaho-Maryland Mine Project (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

Agcy 3-1

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code., § 1802.) Similarly for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project is subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code is recommended. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Act, and other provisions of the Fish and Game Code that afford protection to California's fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

The Project's surface components will be located on approximately 175.64 acres consisting of the Brunswick Industrial Site, the Centennial Industrial Site, and a 0.30-acre portion of East Bennett Road for off-site improvements associated with a potable water pipeline easement. The Project would also involve underground mining within an approximately 2,585-acre mineral rights boundary owned by the Rise Grass Valley.

Agcy 3-2

The Project consists of re-initiating underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year period. Following completion of mining and processing activities, the Project sites would be reclaimed to open space and industrial uses. The Project would involve: (1) dewatering of the underground mine workings; (2) construction and operation of aboveground processing and water treatment facilities at the Brunswick Industrial Site; (3) engineered fill placement for potential future industrial pad development at the Centennial and Brunswick Industrial Sites; (4) installation of a potable water pipeline for residential potable water supply; and (5) reclamation of the Project sites in accordance with the Project's proposed Reclamation Plan. From the total of 175.64 acres included in the Project sites, approximately 104 acres would be disturbed as a result of construction of the facilities proposed to support dewatering, mining, and processing at the Idaho-Maryland Mine, as well as engineered fill placement.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below, in addition to the comments in Attachment 1, to assist the County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Agcy 3-3

CDFW is primarily concerned with the Project impacts to existing fish and wildlife resources including brown trout (*Salmo trutta*), foothill yellow-legged frog (*Rana boylii*) (FYLF), California red legged frog (*Rana draytonii*), Pine Hill flannelbush (*Fremontodendron californicum ssp. decumbens*), California black rail (*Laterallus jamaicensis coturniculus*), willow flycatcher (*Empidonax traillii*), and other aquatic and terrestrial plant and wildlife species. CDFW is also concerned with impacts from the discharge of water on riparian habitat, impacts to downstream aquatic resources from mining activities, and dewatering impacts on water temperature, nutrient concentrations, and turbidity. CDFW provides the attached and following comments for the County's consideration:

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Agcy 3-4

1. On page 2-30, Measure 4.4-1(a) for Pine Hill flannelbush (*Fremontodendron californicum ssp. decumbens)* lists Project-specific mitigation measures to be implemented on the Centennial Industrial Site. Some of these measures include seed collection, transplantation, and creating a Habitat Management Plan (HMP). Pine hill flannelbush is listed as rare under the Native Plant Protection Act (NPPA) (Fish & G. Code § 1900 et seq.). The NPPA prohibits the take or possession of state-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Please see comment 3 for Incidental Take Permit (ITP) recommendations.

Agcy 3-5

2. On page 2-34, two of the special status plants that mitigation measure 4.4-1(b) refers to, are listed as state endangered, the Stebbin's morning glory (*Calystegia stebbinsii*) and the Scaddel Flat checkerbloom (*Sidalcea stipularis*). Measures indicated to be included in the HMP as currently described in the DEIR would result in take. Measures resulting in take include, but are not limited to, on page 2-37 *"remove bulbs of individual plants to be directly impacted during the dormant season; relocate the bulbs to a site with similar soil, hydrologic, vegetation type and aspect as the portion of the project site where the plants are found; and identify the location(s) for dormant season relocation and site selection for transplantation."* As stated above, take of state-listed plants due to Project activities may only be permitted under an appropriate CESA take authorization. Please see comment 3 for ITP recommendations.

Agcy 3-6

Additionally, the DEIR should cover a range of possibilities for mitigation. The use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species are generally experimental in nature and largely unsuccessful. Therefore, the DEIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

Agcy 3-7

3. CDFW recommends that an ITP be obtained where the Project has the potential to result in take of a species state-listed as rare, candidate, threatened, or endangered under CESA or NPPA, either through construction or over the life of the Project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may nevertheless meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).). Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code § 2081 (b)). To facilitate the issuance of an ITP, CDFW recommends the DEIR include species specific measures to minimize and fully mitigate the impacts to any state-listed species the Project activities have the potential to take.

Agcy 3-8

4. On page 2-38, the FYLF pre-construction survey and avoidance and minimization measures as laid out in measure 4.4-2(a), details Visual Encounter Surveys (VES) to be conducted. However, given that there are sightings of FYLF within five miles, both to

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the north at Deer Creek, and to the East at Greenhorn Creek, the limited historic survey data available in the immediate Project vicinity, and the lack of information regarding the distribution and extent of the current FYLF population within the Project area, CDFW recommends FYLF surveys and habitat assessments be conducted throughout the Project Study Area and include the results in the DEIR. CDFW recommends that surveys be conducted in accordance with CDFW's *Considerations for Conserving the Foothill Yellow-Legged Frog* (2018), available here: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline. CDFW recommends the following survey and species considerations be incorporated into the DEIR for Project implementation:

a. As described in the CDFW's *Considerations for Conserving the Foothill Yellow-Legged Frog* (2018) document, VES conducted during the late summer are often the easiest method for determining presence; subadults and occasionally adults are often observed along river margins, and subadult and adult frogs will likely also be observed in tributary streams (Crump and Scott 1994).

b. To increase the likelihood of detection, surveys should include at least one VES during the breeding and/or oviposition period (generally April – June), a tadpole survey four to eight weeks after the breeding survey(s), a subadult survey in late summer/early fall (generally late August to early October), and a final VES within 3 to 5 days prior to starting work.

    i. It is important to understand that frogs are ectothermic, so ambient temperature affects the likelihood of detection. Whether the life form is larval or subadult, both stages will shelter in place under substrate and emerge and become active with warmth (i.e., detection probability increases with temperature).

c. If a survey fails to detect foothill yellow-legged frogs within suitable habitat, a follow-up survey should be conducted two to four weeks after the initial survey.

d. Develop measures to avoid incidental take on a site- and project-specific basis.

    i. For example, measures may vary based on the type and extent of disturbance, duration and timing of disturbance, and influence of environmental factors. A season of operation that completely avoids foothill yellow-legged frog presence does not exist; if frogs are present and breeding, they may be encountered in various life stages year-round. However, in locations having periodic dry conditions, especially prolonged dry conditions, foothill yellow-legged frogs are unlikely to be encountered. Under dry conditions, foothill yellow-legged frogs usually seek refuge in wetted tributaries (or any wetted feature).

Agcy 3-9

In March 2020, the California Fish and Game Commission recognized two clades of the FYLF (*Rana boylii*) as threatened under the CESA. The Northeast/Northern Sierra clade was one of those clades. Therefore, please revise Table 4.4-6 to reflect Foothill

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yellow-legged frog status as threatened under CESA. Please see comment 3 for ITP recommendations.

5. On pages 2-43 through 2-45, the California black rail 4.4-2(d) pre-construction survey and avoidance and minimization measures indicate that a call-back/response survey will be done to detect evidence of this species. The California black rail is a fully protected species (Fish & G. Code § 3511). Fully protected species may not be taken or possessed at any time. The DEIR should state that the qualified biologist will obtain the proper permits prior to implementing call-back/response surveys. This may include the need for a Memorandum of Understanding (Fish & G. Code § 2081(a)) from CDFW prior to conducting the surveys to ensure the species scientific research is executed appropriately and the data is reported accurately.

Agcy 3-10

Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the County include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts and avoid take of fully protected species.

6. The DEIR has identified perennial, intermittent, and ephemeral rivers, streams, and other hydrologically connected aquatic features. The DEIR did not analyze all potential temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned aquatic features and associated biological resources/habitats that may occur because of the Project. Therefore, the DEIR should propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level including but not limited to Project impacts to water temperature, water nutrient concentrations, and turbidity.

Agcy 3-11

The DEIR has identified Project activities that will require notification to CDFW pursuant to Section 1602 of the Fish and Game Code. Notification is required for any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake,
- Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
- Deposit debris, waste, or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW will determine if the Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. The Project as currently

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proposed in the DEIR will require a LSA Agreement. A LSA Agreement will include measures necessary to protect existing fish and wildlife resources.

CDFW's issuance of a LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of a LSA Agreement, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, minimization, mitigation, and monitoring and reporting commitments.

7. The DEIR does not include a discussion of the Project's effects of mining operations on resident fish in Wolf Creek or South Fork Wolf Creek. On March 8, 2022, CDFW staff performed a spot electrofishing survey within South Fork Wolf Creek. The survey included three electrofishing locations within Reaches C and D as shown in Appendix K.1, Figure A1, of the DEIR. The efforts identified the presence of multiple life stages of resident brown trout (*Salmo Trutta*) at each of the survey locations (Memorandum: Electrofishing at South Fork Wolf Creek, Nevada County, March 8, 2022). The DEIR should discuss resident fish in South Fork Wolf Creek and Wolf Creek and analyze potential fisheries impacts that may occur as a result of the Project and propose ways to avoid, minimize, or mitigate any potentially significant impacts to a less-than-significant level.

Agcy 3-12

8. In Appendix K-2, the DEIR estimates that initial dewatering will involve pumping groundwater from the mine works at a rate of approximately 2,500 gallons per minute (gpm) for six months, with ongoing dewatering of 850 gpm during mine operation. As a result of the dewatering, there is a predicted groundwater drawdown of up to 10 feet. The DEIR identifies the different types of vegetation within the Project site, including riparian vegetation, but does not characterize the vegetation's potential reliance on groundwater or interconnected surface waters. The DEIR does not include a discussion of the potential impacts of lowering the groundwater table on environmental users of groundwater, such as groundwater dependent ecosystems or environmental users of interconnected surface waters.

Page 121 of Appendix K.2 of the DEIR states that in higher topographic areas, the depth to groundwater is already below typical rooting depths and that in lower areas, the flow releases to South Fork Wolf Creek would increase recharge to support groundwater levels. Appendix K.2 does not provide sufficient detail about the location of vegetation that may be reliant on groundwater or interconnected surface waters, the depth to groundwater underlying those areas, or evidence that increased flows in South Fork Wolf Creek would provide enough groundwater recharge to maintain groundwater

levels to support existing vegetation. Additionally, Appendix K.2 states that because projected groundwater drawdown is within the range of historic fluctuations, impacts would be less-than-significant. However, maintaining groundwater at the projected maximum drawdown level, or any reduced groundwater level, for sustained mine operations over 80 years without the reprieve of historical seasonal groundwater highs may result in temporary or permanent impacts to environmental users of groundwater, including groundwater dependent vegetation.

Agcy 3-13

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The DEIR should include a more detailed analysis of the impacts of initial and continued dewatering on environmental users of groundwater, including groundwater dependent ecosystems and users of interconnected surface waters. The analysis should include figures displaying the locations of potential groundwater dependent ecosystems or riparian or other vegetation that relies on interconnected surface waters, the depth to groundwater underlying the groundwater dependent ecosystems and riparian vegetation in Project and non-Project scenarios, and additional discussion of the projected increase in recharge as a result of the discharge of treated water into South Fork Wolf Creek, including the interconnectivity between groundwater and South Fork Wolf Creek surface water. If this more detailed analysis identifies any potentially significant impacts, the DEIR should state how the Project will avoid, minimize, or mitigate any these impacts to a less-than-significant level.

9. The DEIR does not discuss Project impacts on water temperature in South Fork Wolf Creek or Wolf Creek. Initial and continued dewatering of the mine works will reduce groundwater discharge into the surface water bodies where groundwater-surface water connectivity exists in proximity to the mine. Groundwater inflows to surface water typically maintain lower surface water temperatures. Where mine operations reduce groundwater contributions to South Fork Wolf Creek by altering the subsurface hydraulic gradients, mine operations can impact creek temperature. The DEIR should analyze the impacts of mine dewatering on surface water temperature in South Fork Wolf Creek and Wolf Creek and the aquatic species therein. If this analysis identifies any potentially significant impacts, the DEIR should state how the Project will avoid, minimize, or mitigate any these impacts to a less-than-significant level.

Agcy 3-14

The DEIR also does not discuss the temperature of the on-site treated water that will be discharged into South Fork Wolf Creek, which has the potential to significantly alter instream temperatures and affect resident aquatic species, including brown trout (see above comment on resident fish). The DEIR should include an analysis of Project impacts on instream water temperatures of South Fork Wolf Creek and Wolf Creek. The analysis should consider both the temperature of on-site treated water discharges into South Fork Wolf Creek as well as the projected reduction of groundwater discharges to baseflow in the surface water bodies. If this analysis identifies any potentially significant impacts, the DEIR should state how the Project will avoid, minimize, or mitigate any these impacts to a less-than-significant level.

10. The DEIR states that the Project, in combination with the cumulative list of projects, would result in a less-than-significant cumulative impact to water quality, drainage patterns, and groundwater resources. The cumulative impacts discussion does not include a discussion of the impacts to environmental users of groundwater, habitats, or aquatic resources that would occur during the 80-year operational timeline for the Project. The 80-year duration of the Project would essentially create a new hydrologic baseline in the Project area and in upstream and downstream interconnected hydrology. The DEIR does not discuss the shifting ecological baseline that would occur during the Project, nor does it account for impacts that would occur at the end of the Project or the restoration timeline for a return to the pre-Project baseline conditions.

Agcy 3-15

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The cumulative impacts discussion should consider the ecological impacts of the 80-year Project implementation timeline and the resulting adaptation of ecosystems and species to long-term altered hydrology. The DEIR should also evaluate impacts to hydrology in the Project area during the period of time in which recharge is refilling the previously dewatered mine works for potential impacts to surface water bodies, aquatic species, and groundwater dependent and riparian vegetation.

Agcy 3-16

11. South Fork Wolf Creek and Wolf Creek are tributary to the Bear River, which has existing beneficial uses of warm and cold freshwater habitat, and wildlife habitat. The DEIR does not discuss potential downstream impacts to the Bear River and its beneficial uses as a result of the Project and associated impacts on upstream hydrology. The DEIR should discuss and assess potential downstream impacts to the Bear River and its existing beneficial uses.

Agcy 3-17

Please see *Attachment 1: Additional CDFW Comments on Idaho-Maryland Mine DEIR April 4, 2022*, for all additional CDFW comments on this DEIR.

ENVIRONMENTAL DATA

Agcy 3-18

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

Agcy 3-19

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Agcy 3-20

Pursuant to Public Resources Code §21092 and §21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to r2CEQA@wildlife.ca.gov.

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CDFW appreciates the opportunity to comment on the DEIR to assist in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Caitlyn Oswalt, Environmental Scientist at (916)358-4315 or Caitlyn.Oswalt@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kevin Thomas
A2A0A9C574C3445...
Kevin Thomas
Regional Manager

Attachment

1. Attachment 1: Additional CDFW Comments on Idaho-Maryland Mine DEIR April 4, 2022

Enclosure

1. Memorandum: Electrofishing at South Fork Wolf Creek, Nevada County, March 8, 2022

ec: Caitlyn Oswalt, Environmental Scientist
Billie Wilson, Senior Environmental Scientist (Supervisory)
Briana Seapy, Senior Environmental Scientist (Supervisory)
Bridget Gibbons, Senior Environmental Scientist (Specialist)
Mitch Lockhart, District Fisheries Biologist
Kelley Barker, Environmental Program Manager
CEQACommentLetters
Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Considerations for Conserving the Foothill Yellow-Legged Frog (CDFW 2018) https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline

	Attachment 1: Additional CDFW Comments on Idaho-Maryland Mine DEIR April 4, 2022					
	Comment #	Section	Print Page #	PDF Page #	Issue / Comment	Solution / Suggested Fix
Agcy 3-21	1	2	1-2	32	Under the Project Components section, it says "the proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit with gold mineralization processing and underground exploration and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations."	Please specify which permit or permits that are being referred to in this statement.
Agcy 3-22	2	2	2-3	53	The DEIR does not include details on what developments are proposed within the Management Plan to allow for development within the required 100-foot setback from the Riparian Areas of the Perennial Watercourses, pursuant to the Nevada County LUDC, Section L-II 4.3.17, at the Brunswick and Centennial Industrial Sites.	CDFW recommends to detail what development is proposed and the impacts those development projects will have on Wolf Creek, South Forth Wolf Creek, the communities that rely on these waterways, and the riparian vegetation.
Agcy 3-23	3	2	2-31	81	Mitigation measure 4.4-1(a) for Pinehill flannelbush (*Fremontodendron californicum ssp. decumbence*) details in the event project actions that will directly impact Pinehill flannelbush, seed collection and banking will be done to ensure the future replacement and recovery efforts pursuant to the requirements of Section 6.2 of the HMP.	Please clarify when and how many seeds will be collected. Once the seeds have been collected, which seed bank will be used and how long will they be stored?
Agcy 3-24	4	2	2-36	86	In mitigation measure 4.4-1(b) it states: "weekly site monitoring by a qualified biologist to ensure that the special-status plants are being protected during site disturbance and construction."	CDFW recommends revising this to, "A qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special status plants and weekly monitoring of the protective fencing along the buffer zone." This will help ensure that special-status plants are being protected during site disturbance and construction.
Agcy 3-25	5	2	2-38	88	There are multiple CNPS listed plants with a ranking of 1B with the potential to occur within the Project site. In mitigation measure 4.4-1(b) for Other Special-Status Plant Species it states: "If the 80 percent survival is not established after two years, transplants of individuals grown from seed shall be planted at a location with similar soil, hydrologic, vegetation type and aspect as the portion of the site where they are found. Transplantation shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced. Transplants shall be monitored every month for the first six months, then every two months for a minimum of two years. After two summer seasons of monitoring identifies successful establishment of 50 percent of the initial transplants, transplant seedlings will be deemed successful."	Measure 4.4-1(b) applies to multiple special status plant species with a CNPS ranking of 1B with the probability to occur within the project site. Therefore, CDFW recommends the DEIR detail species specific measures and success criteria that will result in no net loss for all special status species. CDFW recommends the Qualified Biologist obtains a scientific collecting permit for any special status plant species that may be impacted by this project. Plant species not listed as rare, threatened, endangered, or candidates for listing under CESA or NPPA may meet the definition of rare or endangered provided in CEQA (Cal. Code Regs., tit. 14, § 15380, subd. (b).).
Agcy 3-26	6	2	2-40	90	4.4-2(b) Western Pond Turtle Pre-construction survey and avoidance and minimization measures.	The western pond turtle (*Actinemys marmorata*) is a species of special concern. Movement out of harm's way must be authorized by CDFW under a scientific collecting permit or a Lake and Streambed Alteration Agreement. The DEIR should state that the Qualified Biologist should have all required permits before commencing species specific surveys.
Agcy 3-27	7	2	2-46	96	Coast Horned Lizard 4.4-2(e) "...If the species is documented during pre-construction survey(s), a qualified wildlife biologist (approved by CDFW) shall move individual coast horned lizards outside of the proposed disturbance area(s) in order to avoid an impact to this species."	For species of special concern, a Scientific Collecting Permit may be required to move individual Coast Horned Lizards out of harm's way. The DEIR should state that the Qualified Biologist should have all required permits before commencing species specific surveys.
Agcy 3-28	8	2	2-47	97	Pre-construction surveys for special-status bats in measure 4.4-2(f) should keep in mind the time of year and avoid starting construction in sensitive bat habitat during maternal rooting season.	To reduce the biological impacts to special status bat species, CDFW recommends conducting bat surveys between March 1 to July 31 by a qualified biologist with experience with bats in the year prior to the removal of any oak trees, buildings and structures, or dewatering of the mines. Bats are at their most vulnerable in buildings during the summer, when large numbers may be gathered together and young bats, unable to fly, may be present. Operations to known breeding sites should therefore be timed to avoid the summer months, therefore work should be sufficiently advanced by May or June for returning bats to be dissuaded from breeding in that site for that year. If no bat roosts are detected, then no further action is required if the trees are removed prior to the next breeding season. If removal is delayed, then an additional pre-construction survey shall be conducted 30 days prior to removal to ensure that a new colony has not established itself.



Agcy 3-29		9	2	2-47	97	Special-Status Bats 4.4-2(f) "...Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in."	In order to ensure the maternal roost has fully dispersed CDFW recommends changing this language to: "...Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until a qualified bat biologist has determined the young bats are no longer roosting and the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in." Additionally, if presence is documented within structures that will be removed on the Centennial Industrial site or the Brunswick Industrial site, along with potential presence within the mine shaft, may result in potentially significant impacts that need to be analyzed and mitigated for accordingly and included in the DEIR.
Agcy 3-30		10	4.4	4.4-73	470	The DEIR does not discuss the potential for additional roosting habitat that may be created from the dewatering of the Idaho-Maryland Mine and the impacts that mining operations could potentially have on bats.	CDFW recommends the DEIR analyze the potential for the Project to impact bats, especially the on going mining activities within the Idaho-Maryland Mine should bats move into the mines once they are dewatered. If potentially significant impacts are identified, the DEIR should describe how the Project will avoid, minimize, and mitigate to a less than significant level.
Agcy 3-31		11				The DEIR lists a number of mitigation measures for biological resources that rely on future approvals or agreements as a means to bring identified significant environmental effects to below a level of significance.	CEQA Guidelines §15126.4 (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. Because there is no guarantee that these approvals or cooperation with all of the involved entities will ultimately occur, the mitigation measures are unenforceable and do not reduce the impacts to biological resources to a less than-significant level. CDFW recommends forming mitigation measures that are actionable and enforceable.
Agcy 3-32		12	2	2-54	104	Under mitigation measure 4.4-3(b) "Place staging areas and other work areas outside of the 50-foot non-disturbance buffers of ephemeral and intermittent aquatic resources and 100-foot nondisturbance buffers of perennial aquatic resources." Staging areas should be adequately distanced from sensitive resources.	Under F&G code 5652, CDFW recommends a 150 foot buffer from the high water mark for all staging areas to prevent unlawfully depositing or placing debris or waste where it can pass into the waters of the state. CDFW recommends including staging areas and other work areas in the Project's subsequent notification pursuant to Section 1602 of the Fish and Game Code to ensure their inclusion in any Lake and Streambed Alteration (LSA) Agreement that may be needed prior to commencing any activity that could deposit debris, waste or other materials where it may pass into any river, stream or lake.
Agcy 3-33		13	2	2-56	106	4.4-3(c) "... Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank."	CDFW is not currently signatory to any in-lieu fee programs and therefore will not likely accept participation in these programs as compensatory mitigation for temporary or permanent loss of wetland habitat. Additionally, any credits purchased should be from a CDFW-approved mitigation or conservation bank to avoid needing to buy credits from multiple banks. CDFW recommends coordinating with all regulatory permitting agencies early and concurrently in the process to reduce the need to mitigate separately for each agency.
Agcy 3-34		14	4.4	4.4-84	481	In Figure 4-4.10 for the Brunswick Industrial Site, it shows the South Fork Wolf Creek flowing near the Water Treatment Pond and a wetland abutting the pond to the northwest.	Please identify how the treatment pond will be constructed to ensure high rain events will not result in untreated water passing into the abutting wetland or South Fork Wolf Creek.
Agcy 3-35		15	4.4	4.4-20	417	Table 4.4-5 has Pine Hill flannelbush (*Fremontodendron decumbens*) potential for presence on the Centennial Industrial Site as High. There have been multiple confirmed cases of presence on the Centennial Industrial Site from the 2019 Pine Hill flannelbush protocol-level surveys and on CNDDB.	CDFW recommends changing the potential status from 'high' to 'present' for the Centennial Industrial Site.

State of California
Department of Fish and Wildlife

Memorandum

Date: March 23, 2022

To: Briana Seapy
Water Program Supervisor
Department of Fish and Wildlife
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

Cc: CDFW North Central Region Fish Files

From: Mitch Lockhart; Environmental Scientist
Department of Fish and Wildlife
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

Subject: Electrofishing Sample at South Fork Wolf Creek, Nevada County, March 8, 2022

Agcy 3-36

In January of 2022, California Department of Fish and Wildlife (CDFW; Department) received a Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR Project (https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley). Upon review of the Draft EIR, Department staff found that potential impacts to the finfish of South Fork Wolf Creek were not addressed with the same rigor afforded other species of concern. Moreover, the Department did not have reliable and current information about the species of fish present in South Fork Wolf Creek. As a result, Department staff sampled South Fork Wolf Creek in three locations downstream of the proposed project to identify the species and life stages of finfish present in an effort to inform the Department's comments regarding the Draft EIR.

On March 8, 2022, CDFW Water Program Supervisor, Brianna Seapy, and two Environmental Scientists, Bridget Gibbons, and Mitch Lockhart, sampled South Fork Wolf Creek at three locations along East Bennet Road, Grass Valley, CA, (**Figure 1**) using a single Smith-Root backpack electrofisher. Mitch Lockhart selected sites that were downstream of the project, accessible via public land, and representative of South Fork Wolf Creek's diversity of instream habitats. The Smith-Root backpack electrofisher was set at 30 hertz, 20% duty cycle, and 350 volts. All fish captured were identified to species, measured to the nearest millimeter, and released near the point of capture.

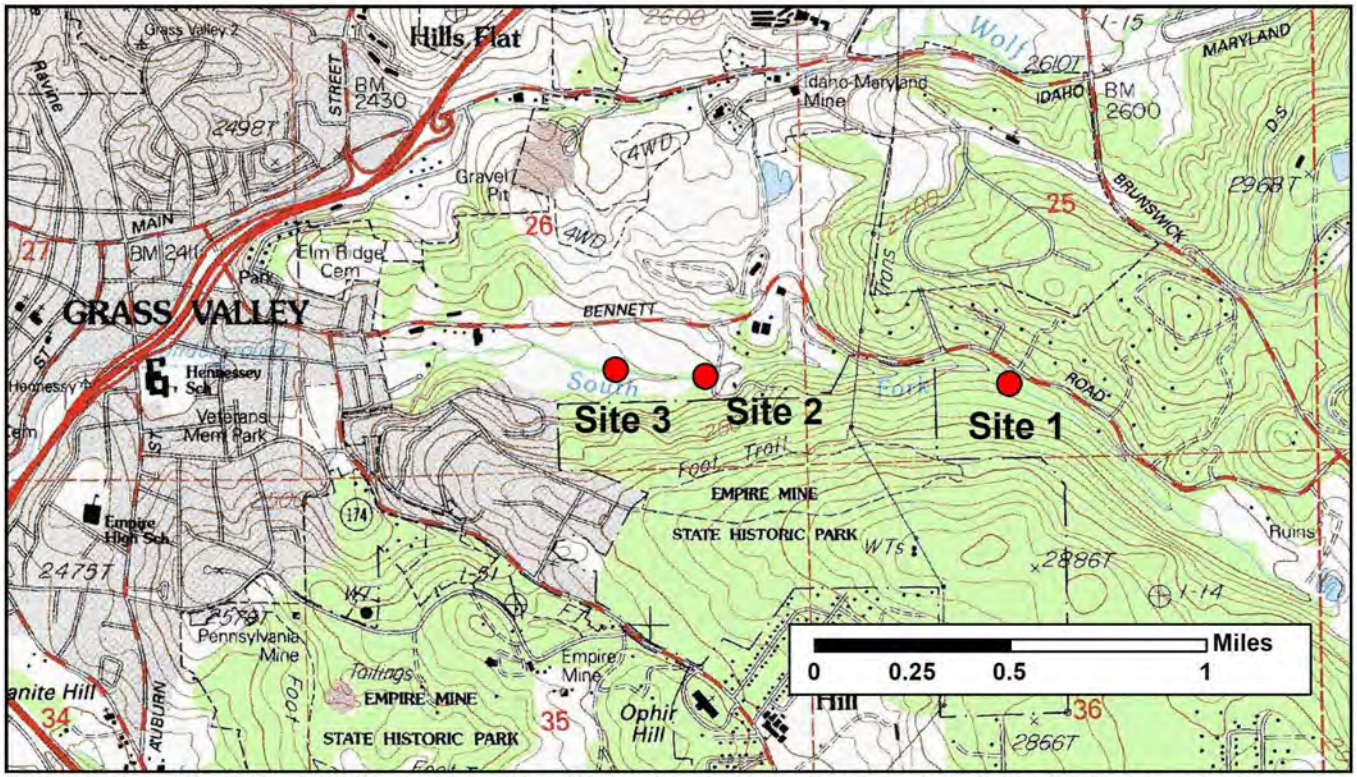

Figure 1: *Map of South Fork Wolf Creek, Grass Valley, Nevada County. Red dots denote electrofishing locations sampled by Department staff on March 8, 2022.*

Table 1: Fish data from South Fork Wolf Creek, March 8, 2022.

Site	Species	Total Length (mm)	Total Length (inch)
Site 1	Brown Trout	129	5.1
Site 1	Brown Trout	143	5.6
Site 1	Brown Trout	145	5.7
Site 2	Bluegill	52	2.0
Site 2	Bluegill	100	3.9
Site 2	Brown Trout	86	3.4
Site 2	Brown Trout	93	3.7
Site 2	Brown Trout	95	3.7
Site 2	Brown Trout	98	3.9
Site 2	Brown Trout	100	3.9
Site 2	Brown Trout	104	4.1
Site 2	Brown Trout	107	4.2
Site 2	Brown Trout	114	4.5
Site 2	Brown Trout	144	5.7
Site 2	Brown Trout	171	6.7
Site 2	Brown Trout	195	7.7
Site 2	Brown Trout	230	9.1
Site 3	Bluegill	98	3.9
Site 3	Brown Trout	105	4.1
Site 3	Brown Trout	109	4.3

The sampling data are summarized in **Table 1**. Site 1 is a step pool system characterized by bedrock substrate and significant woody debris. Gravel and cobble substrates are limited to pool tails and small riffles between steps. Department staff captured three Brown Trout (*Salmo trutta*). Fish captured in Site 1 had damaged and worn caudal and dorsal fins and were of poor body condition (**Figure 2**). Fish were thinly distributed, only occupying the most oxygenated step pools with plenty of unoccupied habitat between fish occurrences. These preliminary data suggest that Brown Trout migrate into this site from more ideal spawning and rearing habitats downstream.

Site 2 is a well-oxygenated riffle over cobble and gravel substrate, with well-covered, slow-moving, holding habitats. Department staff captured twelve BN and two Bluegill (*Lepomis macrochirus*). Fish captured in Site 2 were of good body condition with healthy fins and no visible signs of disease (**Figure 2**). Site 2 had the highest fish density and diversity of Brown Trout sizes suggesting that Site 2 is a spawning and rearing location for Brown Trout.

Site 3 is a slow-moving set of two deep pools characterized by silt substrate and woody debris. Department staff captured two Brown Trout and one Bluegill. The pools provide ideal holding habitat, but do not offer any gravel substrate for spawning, nor any source of oxygenated water. Fish captured in Site 3 were of good body condition with healthy fins and no visible signs of disease. The pools were too deep to sample effectively with a single backpack electrofisher. As a result, fish density may have been higher at Site 3 then the data reflect.

Agcy 3-37

These preliminary data clearly indicate South Fork Wolf Creek supports a wild and self-sustaining population of Brown Trout and non-native sunfish. Further surveys are necessary to estimate the size of the Brown Trout population, and to delineate habitats critical to Brown Trout reproduction and rearing.



Figure 2: *Photos of two Brown Trout (Salmo trutta) captured from South Fork Wolf Creek, Grass Valley, Nevada County, by backpack electrofisher on March 8, 2020. The left panel is a Brown Trout with poor body condition captured in Site 1 and can be contrasted against the Brown Trout in the right panel with good body condition captured in Site 2.*

AGENCY LETTER 3: SHAUNDRA CASHDOLLAR, CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Response to Comment Agcy 3-1
Comment noted. This is an introductory statement regarding CDFW's role as a responsible agency and does not provide a comment regarding the adequacy of the DEIR.

Response to Comment Agcy 3-2
Comment noted. This is an introductory comment summarizing CDFW's understanding of the project and does not provide a comment regarding the adequacy of the DEIR.

Response to Comment Agcy 3-3
This is an introductory comment broadly outlining concerns detailed in the comment letter. Please see the following master responses addressing these issues:

- Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog;
- Master Response 36 - Flows in South Wolf Creek;
- Master Response 32 -Temperature of Mine Water Discharge;
- Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts;
- Master Response 34 - Resident Fish;
- Master Response 37 - Birds and Raptors; and
- Master Response 31 - Rare Plants.

Response to Comment Agcy 3-4
This comment provides general information regarding the requirements of the Native Plant Protection Act and refers to comment Agcy 3-7.

Response to Comment Agcy 3-5
Comment noted. Mitigation Measure 4.4-1(b) outlines the requirements for preparation of a County required Habitat Management Plan if special-status plant species are identified onsite. The County Habitat Management Plan is not intended to supersede state and/or federal take requirements associated with any special-status species. The applicant would obtain approval of an ITP, as necessary, for take of any California-listed special-status species. In order to provide this clarification, Mitigation Measure 4.4-1(a), on page 4.4-64 of the DEIR, has been revised in this Final EIR. Please see Response to Comment Grp 12-34.

Additionally, the third paragraph of Mitigation Measure 4.4-1(b) has been revised to read as follows:

> *If any special-status plant species are found, ~~protection of such plant shall include complete avoidance, transplantation, or on- or off-site restoration of the special-status plant species that could be impacted by site disturbance. These protective measures for such plants shall be included as part of the required development of a Habitat Management Plan (HMP) as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12, which includes regulations intended to avoid the impact of development on rare, threatened, endangered, and special-status species and their habitat, or where avoidance is not possible, to minimize or compensate for such impacts and to retain their habitat as non-disturbance open space.~~ and they are located in an area where impacts are proposed, then the special-status plants shall be completely avoided until a Habitat Management Plan*

> *(HMP) is developed and approved by the Nevada County Planning Department. If the plant is listed on the federal or state Endangered Species lists or is state listed as rare, then development of this plan shall be conducted in consultation with USFWS and/or CDFW, respectively, and a BO and/or an ITP shall be obtained prior to impacts. The HMP shall include the avoidance, minimization, and mitigation measures outlined below as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12. Note that transplantation and monitoring specifics are examples only, and final details will be developed based on the species to be impacted, if any.*

The changes to Mitigation Measures 4.4-1(a) and (b) are provided for clarification purposes in Response to Comment Agcy 3-5 and do not affect the adequacy of the analysis contained in the DEIR, nor alter the conclusions therein.

Response to Comment Agcy 3-6

The commenter states that the project should include a variety of mitigation strategies, including conservation, preservation, restoration, habitat enhancement, and avoidance. Restoration is included as a major aspect of the mitigation for impacts to this species as outlined in Mitigation Measure 4.4-1. The DEIR includes a variety of mitigation measures depending on the potential impacts, local, state or federal permitting requirements, and specifics of that particular species. For example, Mitigation Measure 4.4-1(a) for the Pine Hill flannelbush includes transplant and seed collection measures (if feasible), habitat enhancement, and conservation easement in order to mitigate project impacts. Impact 4.4-2, analyzing project impacts to special-status species, includes mitigation measures requiring preconstruction surveys and preparation of County required management plans. In addition, depending on the species, if identified onsite, consultation with the appropriate state or federal agency may be required. Finally, impacts to waters and wetlands in Impact 4.4-3 are mitigated through subsequent permitting with various state and federal agencies. As demonstrated, a variety of mitigation measures, many with numerous steps and tiered requirements depending on the specie or survey results, will be implemented to reduce project biological impacts to a less than significant level.

Response to Comment Agcy 3-7

This comment provides general information on the Incidental Take Permit requirements in the event project activities require application for and issuance by CDFW. The DEIR Mitigation Measures for state-listed wildlife species already require approval of an ITP, as necessary for take of any California-listed special status species. As shown in Response to Comment Agcy 3-5, the Final EIR mitigation measures for plants have been revised to require approval of an ITP for state-listed plant species.

Response to Comment Agcy 3-8

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Agcy 3-9

Comment noted. For clarification purposes, Table 4.4-6 of the DEIR has been revised accordingly:

Foothill yellow-legged frog *Rana boylii*	SCT/S<u>T</u>~~CC~~

The above minor change is for clarification purposes and does not affect the analysis, nor conclusions, in the DEIR.

Response to Comment Agcy 3-10

A callback survey is not considered a "take" under Fish and Game Code Section 86 based on the plain language of the Fish and Game Code and the legal authorities interpreting the definition of "take" under state and federal laws. Fish and Game Code Section 86 states that "'Take' means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." A prerequisite for a take to occur under CESA (Fish & Game Code § 2050 et seq.) is that an act actually kills or injures wildlife. (78 Ops. Cal. Atty. Gen. 137 at p. *3 (May 15, 1995).) Callback surveys are not listed in, and do not involve activities that would meet, the definition of "take" in Fish and Game Code Section 86. In addition, the callback survey is implemented for the detection of a species, and does not involve the killing or injuring of animals, therefore is not considered take. The DEIR has analyzed project-specific impacts to special-status species and their habitats in DEIR Chapter 4.4 and recommended mitigation measures where a potential impact was identified. Many of these mitigation measures recommended avoidance where feasible. Note that California Black Rail was considered to have a "very low" likelihood of being found onsite in the DEIR. If California Black Rail is found onsite, the applicant will consult with CDFW to avoid take of this species. Note that the DEIR reflected that California Black Rail is California Threatened, but it is also considered California Fully Protected. The DEIR has been amended to reflect the Fully Protected status for this species. Additionally, Mitigation Measure 4.4-2(d) has been amended to remove reference to an ITP being obtained for take of California Black Rail. As this species is considered to have a very low potential to be found onsite, surveys will be conducted prior to site disturbance, and consultation with CDFW and avoidance shall be required in the case of species presence; this impact is still considered less than significant.

The following clarifications to Chapter 4.4, Biological Resources, of the DEIR are hereby implemented in response to the comment:

Table 4.4-6 is hereby revised as follows:

California black rail *Laterallus jamaicensis coturiculus*	--/CT California Fully Protected

Page 4.4-39 (description of California black rail) is hereby revised as follows:

> California black rail (*Laterallus jamaicensis coturiculus*) – CA State Threatened and CA State Fully Protected
>
> California black rail inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. The species requires water depths of approximately one inch that does not fluctuate during the year and dense vegetation for nesting habitat.

Mitigation Measure 4.4-2(d), pertaining to California black rail, is hereby revised as follows:

> *California Black Rail*
>
> *4.4-2(d) Pre-construction Survey and Avoidance and Minimization Measures. Pre-construction surveys for California black rail shall be conducted by a qualified biologist prior to the implementation of any ground disturbance within or directly adjacent to any perennial marsh and wet meadow habitat within the Centennial and Brunswick Industrial Sites. The pre-construction surveys for this species shall occur no more than fourteen (14) days prior to any such disturbance within or directly adjacent to the species habitat. The pre-construction surveys shall include conducting call back/response surveys. This species is most active between two*

hours before and three hours after sunrise; therefore, surveys shall start at sunrise and continue no later than 0930. If evening surveys are to be conducted, they shall be paired with a morning survey, and all sites shall have surveys conducted at both time periods. The preferred method for conducting surveys via the call-back/response protocol of Evens et al (1991). If the pre-construction survey does not detect evidence of California black rail, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a positive call back is identified during the surveys, then the species is assumed to be present and the area shall be avoided from disturbance in order to avoid impacts to individuals of the species, if feasible.

Given the species is a CESA listed species, coordination with CDFW shall occur if a positive response to the call-back/response surveys occurs and if any proposed disturbance may impact the species. Any area containing this species would likely need to be avoided in order to avoid impacts to and take of this species, if feasible, or additional mitigation measures would be required in coordination with CDFW to minimize and avoid impacts to such species. Additional avoidance measures could include, but may not be limited to the following: environmental awareness training, daily construction monitoring by a CDFW qualified biologist when disturbance related activities occur within or directly adjacent to the species habitat, and exclusionary fencing installation between the species habitat and the proposed disturbance areas. ~~Additionally, an ITP could be required by CDFW if complete avoidance of the species is not feasible.~~ Areas where no positive response to the call-back/response surveys are assumed to not contain individuals of the species and therefore, disturbance in those areas would have no impact on this species.

Watercourse/Wetlands/Riparian Areas Management Plans. The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial and Brunswick Industrial Sites, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control.

The above minor changes are for clarification purposes and do not affect the analysis, nor conclusions, in the DEIR regarding California black rail.

Response to Comment Agcy 3-11

The commentor generally notes not all potential impacts to aquatic features were analyzed but does not specifically provide what impacts were not analyzed. DEIR Chapter 4.4, analyzed potential biological impacts including impacts to aquatics features and associated habitat. This impact analysis was based on eleven different technical studies prepared by experts in their fields, and followed up by a County peer review using a independent biology firm. Technical studies specifically included aquatic resources determinations for both the Centennial and Brunswick Industrial sites and draft County management plans for potential impacts to watercourses/wetlands/riparian areas. DEIR Impact 4.4-3 analyzed the project's potential to impact state or federally protected waters and wetlands and determined this impact was potentially significant. Mitigation measures 4.4-3(a-d) were identified that reduce this impact to a less than significant level. Mitigation Measure 4.4-3(d) specifically requires the applicant to apply for a CDFW 1600 Streambed Alteration Agreement. The impact analysis and mitigation measures comprehensively address potential project impacts to waters and wetlands on the project site.

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Agcy 3-12

The commenter asserts that the DEIR should provide further analysis of impacts and mitigation for impacts to Brown Trout found in South Fork Wolf Creek; however, Brown Trout are an invasive species, and even if they were not an invasive species, there is no evidence provided by commenter that any impact will occur. Please see Master Response 34 - Resident Fish. Furthermore, CEQA does not require an analysis of impacts to all resident fish, but only to those considered special-status pursuant to CEQA guidelines. The only fish that have been documented in Wolf Creek and South Fork Wolf Creek are non-native fish (brown trout and bluegill). As such, no analysis of impacts to "resident fish" is appropriate under CEQA.

Response to Comment Agcy 3-13

The DEIR does include a discussion of potential impacts of lowering the groundwater table on vegetation in the context of wildfire (see page 4.13-21). Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Please also see Master 33 - Groundwater Dependent Vegetation, regarding potential groundwater drawdown impacts to surface vegetation. Further, in order to clarify that groundwater drawdown induced from the mine would not impact groundwater dependent (phreatophytic) vegetation, Itasca Denver prepared a memo showing the simulated drawdown in selected meadows. These three meadows (Brunswick site, Empire Mine Park, and Loma Rica) would experience minimal drawdown, even without consideration of the minewater discharge to South Fork Wolf Creek. The Empire Park Meadow would experience no drawdown with the addition of 1.9 cfs (average maintenance dewatering rate) and less than 1 inch of drawdown with no added flow from mine dewatering. (See Itasca Memo – Simulated Drawdown of Selected Meadows attached to the Final EIR as Appendix H). If the addition of mine water discharge were considered, there would likely be even less impact. As such, this impact to groundwater dependent vegetation is still considered less than significant.

Response to Comment Agcy 3-14

Please see Master Response 32 - Temperature of Mine Water Discharge, regarding the temperature of treated water discharge into South Wolf Creek.

As discussed on page 4.8-66 of the DEIR, the total flow reduction in base flow to Wolf Creek from the project is minimal and barely perceptible compared to the existing base flow. Furthermore, Wolf Creek will be considered a COLD water body for the application of water quality objectives. The water currently draining from the mine (0.13 to 0.28 cfs) is warmer than Wolf Creek during all seasons (See Table 3-5 and 3.8 of Appendix K.2). Therefore, elimination of the drainage will not increase water temperature in Wolf Creek. The base flow of Wolf Creek would be reduced by 0.75 cfs due to reduction in groundwater discharge to the creek. This groundwater would be warmer than surface water during winter months and cooler in summer months. During the summer months, high flows are present in Wolf Creek (approximately 40 cfs). Any potential loss of cooling from groundwater would be minimal as the observed baseflow in Wolf Creek at the Centennial Drive bridge ranges from about 40 to 100 times greater than the projected decrease of 0.75 cfs. In addition, please see Master Response 36 - Flows in South Fork Wolf Creek and Wolf Creek.

Response to Comment Agcy 3-15

The commenter states that the DEIR should analyze the cumulative impacts of the project's proposed hydrological changes on ecosystems. The DEIR already analyzed the project's cumulative impacts on biological resources and concluded that the project could have a cumulatively considerable impact, absent mitigation. (DEIR, p. 4.4-96.) The DEIR then concludes that after implementation of Mitigation Measures 4.4-1(a-b), 4.4-2(a-g), and 4.4-3(a-d), the project's incremental contribution to cumulative biological resources impacts would be reduced to a less than cumulatively considerable level.

The DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measure 4.8-1(a) to address these potential impacts. This mitigation measure requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals.

As stated on Page 11 of NPDES CAG995002 ORDER R5-2022-0006, the requirements of the Order are specifically drafted to implement the Basin Plan's policies and objectives. The Basin Plan considers all beneficial uses including environmental uses. (See Response to Comment Agcy 3-16).

The mitigation measure therefore ensures the protection of beneficial uses. This includes the preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates (COLD). This includes uses of water that support terrestrial or wetland ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats or wetlands, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources (WILD).

As discussed in Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 34 - Resident Fish, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek, the project's impacts on the ecosystem and riparian habitats due to groundwater drawdown and the discharge into South Fork Wolf Creek will not be significant, and may be beneficial for some species due to the increased flows of approximately 1.9 to 5.6 cfs of clean water that meets CVRWQCB standards. Likewise, impacts to groundwater dependent vegetation are shown to be very small (e.g., only an inch of drawdown in the Empire Park Meadow, without even considering the additional recharge from increased flows) and are therefore expected to be less than significant. With regard to the commenter's question on the closure of the mine and the return to baseline conditions, it is expected that refilling of the mine will only take a few years (1 to 2 years), and therefore will quickly return to pre-project conditions without any long-term effect. As stated on page 4.8-51 of the DEIR, once mining is completed, dewatering ceases, and the underground workings are allowed to flood with groundwater, the same reducing conditions that occur under existing conditions within the mine workings would develop again, preventing oxidation of sulfide minerals. Water quality in the re-flooded mine workings would then have the same general pH, TDS, and other water quality conditions that occur under existing conditions. The underground workings are anticipated to refill over the next several years (1 to 2 years). Thus, any seepage from drains and fractures within the bedrock would have a comparable water quality to the discharge from the drains along Wolf Creek under existing conditions. During the refilling of the mine, the drawdown impacts from dewatering will gradually return to pre-project conditions while the increased flow conditions in South Fork Wolf Creek will cease. This refilling period will

not cause an impact as it will represent a return to pre-project baseline conditions and is temporary.

The project itself will not cause a significant impact to the ecosystem due to changed hydrology, and the project combined with the cumulative list of projects is not expected to cause a cumulatively considerable impact to the environmental users of groundwater, habitats or aquatic resources during the life of the project.

Response to Comment Agcy 3-16

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Given that the project will not significantly impact beneficial uses to South Fork Wolf Creek, as discussed in the abovementioned Master Responses, the project's much smaller contribution to overall flow in Wolf Creek, as compared to South Fork Wolf Creek, is also not expected to impact beneficial uses in Wolf Creek.

The Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (hereinafter "Basin Plan") that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan. The Basin Plan at page 2.3 states that the "…beneficial uses of any specifically identified water body generally apply to its tributary streams." The Basin Plan does not specifically identify beneficial uses for South Fork of Wolf Creek but does identify present and potential uses for the Bear River, to which the South Fork of Wolf Creek and Wolf Creek are tributary. As discussed on page 4.8-31 of the DEIR, the beneficial uses of Bear River and South Fork Wolf Creek are identical and therefore the potential downstream impacts to the Bear River are already analyzed in the DEIR.

As discussed on page 15 of Appendix K.2, much of the flow within Wolf Creek is due to releases of water by Nevada Irrigation District (NID). In 2018, the releases to Wolf Creek averaged approximately 36 cfs. On April 17, 2019, EMKO measured the flow in Wolf Creek at the Centennial Drive bridge (at the intersection with Idaho-Maryland Road) at approximately 50 cfs. EMKO also measured the flow in Wolf Creek at the Centennial Drive bridge on August 8, 2019. At that time, the flow was estimated to be approximately 75 cfs. The flow of the Bear River is not discussed in the DEIR. However, a USGS gage station is located on the Bear River downstream of Rollins Reservoir (USGS Station 11422500, Bear River below Rollins Reservoir, Near Colfax). Mean water flow in the Bear River at this station ranges from approximately 110 cfs to 1,000 cfs over the previous 10 water years.

https://waterdata.usgs.gov/nwis/annual?referred_module=sw&site_no=11422500&por_11422500_216838=2209688,00060,216838,1912,2021&year_type=W&format=html_table&date_format=YYYY-MM-DD&rdb_compression=file&submitted_form=parameter_selection_list

Response to Comment Agcy 3-17

Comment noted. Responses to Attachment 1 are provided in Responses to Comments Agcy 3-21 through 3-37.

Response to Comment Agcy 3-18

The comment does not provide a comment regarding the adequacy of the DEIR. Comment noted.

Response to Comment Agcy 3-19

The comment does not provide a comment regarding the adequacy of the DEIR. Comment noted.

Response to Comment Agcy 3-20

The comment does not provide a comment regarding the adequacy of the DEIR. Comment noted. The County will continue to provide CDFW with project notifications.

Response to Comment Agcy 3-21

A list of potential permits and approvals is provided in DEIR section 3.8, Requested Discretionary Actions.

Response to Comment Agcy 3-22

Draft management plans detailing potential disturbance within the 100-foot setback from riparian areas were provided in Appendix F.5, F.8, and K.6 to the DEIR.

Response to Comment Agcy 3-23

Please see Appendix F.4 detailing seed collection techniques for the Pine Hill Flannelbush, including information on how many seeds will be collected as requested by the commenter. As stated on page 6-2 of Appendix F.4, approximately 30-100 seeds per plant were collected from four plants in 2019 and are stored in the seedbank of UC Santa Cruz. Additional seeds will be collected to have enough seed and it is recommended that up to 400 seeds should be collected from each plant to be destroyed or planted to have sufficient buffers for future propagation efforts and for seed banking.

Response to Comment Agcy 3-24

In response to the comment, Mitigation Measure 4.4-1(b), paragraph four, fifth bullet, is hereby revised as follows:

> *At a minimum, the HMP shall include the following protective measures for special-status plant species with the potential to be impacted by the proposed disturbance:*
>
> - *a map of the location of special-status species that may be disturbed or need to be protected;*
> - *location of environmental protection fencing to be placed around the individual plants to be protected;*
> - *identification of the location of protected plants on design and construction drawings;*
> - *environmental awareness training for all personnel working on the project during initial site disturbance to discuss the location of the protected plants and the measures to be taken to avoid impacts to them; and*
> - *a qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special-status plants and weekly ~~site~~ monitoring of the protective fencing along fencing along the buffer zone~~by a qualified biologist to ensure that the special-status plants are being protected during site disturbance and construction~~.*

The above minor revisions are made in response to the comment and do not affect the adequacy of the analysis, nor the conclusions in the DEIR.

Response to Comment Agcy 3-25

As detailed in DEIR Impact 4.4-1, other than Pine Hill flannelbush, no other List 1 or 2 plant species were identified onsite during rare plant surveys. It would be premature at this time to identify specific measures for potential rare plants to occur. As detailed in Mitigation Measure 4.4-1(b), if List 1 or 2 rare plants are identified during follow-up surveys, a management plan will be prepared consistent with Nevada County Land Use and Development Code, Section L-II 4.3.12.

Response to Comment Agcy 3-26

Mitigation measure 4.4-2(b) states the qualified biologist shall have a CDFW handling permit.

Response to Comment Agcy 3-27

Mitigation Measure 4.4-2(e) has been clarified per the commenter's suggestion, as follows:

> *Coast Horned Lizard*
>
> *4.4-2(e)* *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance within the areas of the Centennial and Brunswick Industrial Sites that contain disturbed or developed surfaces and annual grassland vegetation community. If the pre-construction survey does not show evidence of coast horned lizard, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.*
>
> *If the species is documented during pre-construction survey(s), a qualified wildlife biologist (approved by CDFW) shall move individual coast horned lizards outside of the proposed disturbance area(s) in order to avoid an impact to this species. The qualified biologist shall have all required permits before commencing species specific surveys. Once the coast horned lizard(s) have been removed from the disturbance area(s) and out of harm's way, the proposed work would no longer pose a risk to individuals of the species.*

The above minor revision is made in response to the comment and does not affect the adequacy of the analysis, nor the conclusions in the DEIR.

Response to Comment Agcy 3-28

The commenter provides recommendations for timing of pre-construction bat surveys required in Mitigation Measure 4.4-2(f) of the DEIR. The comment will be considered by the qualified biologist during implementation of said mitigation. Comment noted.

Response to Comment Agcy 3-29

Mitigation Measure 4.4-2(f) has been clarified per the commenter's suggestion, as shown below. The Brunswick shaft is currently sealed with a steel cover and no special species bats are present in the mine shaft. As discussed on page 4.4-73 of the DEIR, the potential for species to occur at the Brunswick Area is considered low. The migration to, and presence of, special species bats in the future dewatered and operating underground mine and constructed headframes is speculative and CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Mitigation Measure 4.4-2(f) is hereby revised as follows:

Special-Status Bats

4.4-2(f) *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction bat roosting survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance of any structures or riparian and forested woodlands within the Centennial Industrial Site and Brunswick Area to identify the presence or absence of roosting bats. If the pre-construction survey does not show evidence of roosting bats, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.*

If any Townsend's big-eared bats (or any other species of bat, including the hoary and pallid bat) are identified during roosting surveys, passive removal of the roosting bats prior to disturbance to structures and riparian and forested woodlands shall be implemented to avoid impacts to this species. Passive removal includes allowing roosting bats to freely leave the roost site (riparian and forested woodlands and any structure). Once the roosting bats have been passively removed from the structure(s) and riparian and forested woodlands, the structure(s) would be closed off from recurring bat roosting within the structure(s) and the proposed work within the structure(s) would no longer pose a risk to individuals of the species. For riparian and forested woodlands containing bat roosts, the removal of trees associated with such woodlands would only occur once the bats leave the day roosts. Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until a qualified bat biologist has determined the young bats are no longer roosting and the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in.

The above minor revision is made in response to the comment and does not affect the adequacy of the analysis, nor the conclusions in the DEIR.

Response to Comment Agcy 3-30

As discussed on page 4.4-73 of the DEIR, the potential for species to occur at the Brunswick Area is considered low. The migration to, and presence of, special species bats in the future dewatered and operating underground mine and constructed headframe is speculative and CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Agcy 3-31

Commenter states generally that the mitigation measures may constitute deferred mitigation but does not provide any specific examples. In this case, the provided mitigation has clear, enforceable performance standards and is not deferred mitigation. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (CEQA Guidelines Section 15126.4.) In the case *Center for Biological Diversity v. California Department of Conservation, etc*. (2019), the court explains that "[g]enerally, it is improper to defer the formulation of mitigation measures…However, an exception to this general rule applies when the agency has committed itself to specific performance criteria for evaluating the efficacy of the

measures to be implemented in the future, and the future mitigation measures are formulated and operational before the project activity that they regulate begins." (36 Cal.App.5th 210, 239.) The court determined both conditions were met and upheld the deferred mitigation measures. Similarly, the mitigation measures presented in the DEIR require compliance with specific performance standards and regulatory requirements, and also require implementation prior to project activities begin.

Response to Comment Agcy 3-32

The commenter recommends a 150ft buffer from perennial streams for placement of staging areas, based on Fish and Game Code Section 5652. However, Fish and Game Code Section 5652 states that it is "unlawful to deposit, permit to pass into, or place where it can pass into the waters of the state, or to abandon, dispose of, or throw away, within 150 feet of the high water mark of the waters of the state, any cans, bottles, garbage, motor vehicle or parts thereof, rubbish, litter, refuse, waste, debris, or the viscera or carcass of any dead mammal, or the carcass of any dead bird." The project does not propose to dispose of any of the listed items into the stream or to dispose of any such item within 150 feet of the stream. Rather, a staging area may be placed no closer than 100 feet from the perennial stream, and items would not be disposed of within 150 feet of the high water mark of the stream, in compliance with the cited Fish and Game Code Section 5562. The applicant is required to comply with California Fish and Game Code Section 5652, regardless of the mitigation measure's buffer size. The comment is noted.

Response to Comment 3-33

The comment is noted and will be considered by the qualified biologist and applicant during mitigation compliance.

Response to Comment Agcy 3-34

The water treatment pond is an existing site feature with a 40-acre foot capacity. Please see DEIR Impact 4.8-3 analyzing the capacity of the water treatment pond and determining sufficient capacity exists based on the storm events modelled. Please also see Appendix K.5 detailing Brunswick Industrial Site drainage and stormwater facility sizing.

Response to Comment Agcy 3-35

Table 4.4-5 of Chapter 4.4 has been updated per the commenter's suggestion, as shown on the following page. The minor change is for clarification purposes and does not alter the analysis, nor conclusions, within the DEIR.

Response to Comment Agcy 3-36

Comment noted. Please see Master Response 34 - Resident Fish.

Response to Comment Agcy 3-37

Comment noted. Please see Master Response 34 - Resident Fish.

Pine Hill flannelbush *Fremontodendron ecumbens*	FE/CR/1B.2	Chaparral, cismontane woodland on serpentinite and gabbroic substrates, from 1,390 – 2,495 feet.	Apr-July	**Centennial Industrial Site** ~~**High**~~**Present**. ~~Potential for occurrence in~~Species identified within openings and under chaparral in gabbroic soils in Idaho Maryland study area. Known from CNDDB Occurrence #14. Protocol level field surveys in 2019 expanded boundaries of known occurrence. **Brunswick Area** **Low.** Known from two miles to the north. Gabbroic soils not present in study area. Was not observed during 2019 protocol level field surveys.

Agency Letter 4

California Water Boards

Gavin Newsom, Governor
Jared Blumenfeld, Secretary for Environmental Protection





Central Valley Regional Water Quality Control Board



9 March 2022

Governor's Office of Planning and Research, State of California, Mar 09 2022

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COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, IDAHO-MARYLAND MINE PROJECT, SCH#2020070378, NEVADA COUNTY

Agcy 4-1 Pursuant to the State Clearinghouse's 3 January 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Idaho-Maryland Mine Project, located in Nevada County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

Agcy 4-2 The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

Denise Kadara, acting chair | Patrick Pulupa, executive officer

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Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations
All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit
Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Agcy 4-3

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit
Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit
If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification
If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic

[1] Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4709 or Greg.Hendricks@waterboards.ca.gov.

Greg Hendricks
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

AGENCY LETTER 4: GREG HENDRICKS, CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

Response to Comment Agcy 4-1

This is an introductory comment. The County acknowledges that the Central Valley Regional Water Quality Control Board is delegated with the responsibility of protecting the quality of surface and groundwaters of the state. Comment noted.

Response to Comment Agcy 4-2

The commenter describes the overall Basin Plan policies and states that the antidegradation analysis is a mandatory element in the NPDES and WDR permitting process. Comment noted. The commenter states that the DEIR should evaluate potential impacts to both surface and groundwater quality. These impacts are analyzed in detail in Chapter 4.8 of the DEIR.

Response to Comment Agcy 4-3

The commenter provides information on permitting requirements, which are addressed in Sections 4.4 and 4.8 of the DEIR, including the commenter's referenced Construction Storm Water General Permit (pages 4.8-27, 4.8-52), Industrial Storm Water General Permit (pages 4.8-30, 4.8-53), Clean Water Act Section 404 Permit (pages 4.4-40, 4.4-91), Clean Water Act Section 401 Permit – Water Quality Certification (page 4.4-91), Waste Discharge Requirements (pages 4.8-29, 4.8-52), Dewatering Permit (page 4.8-31), and Limited Threat General NPDES Permit (pages 4.8-30, 4.8-52). Comment noted.

Agency Letter 5

California Water Boards

Gavin Newsom, Governor
Jared Blumenfeld, Secretary for Environmental Protection

Central Valley Regional Water Quality Control Board

4 April 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Via email
Idaho.MMEIR@co.nevada.ca.us

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
IDAHO-MARYLAND MINE PROJECT, NEVADA COUNTY

Agcy 5-1

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff reviewed the December 2021 Draft Environmental Impact Report (Draft EIR) Volume I of X (Chapters 1-8) for the Idaho-Maryland Mine Project (the Project). The Regional Water Quality Control Boards are delegated with the responsibility of protecting the quality of surface and groundwaters of the state.

Central Valley Water Board staff assumes that the project applicant, Rise Grass Valley, Inc., (Rise Grass Valley) will continue to proceed with County permits and authorizations prior to seeking the necessary approval/permits from the Central Valley Water Board. Therefore, our comments address the adequacy of the Draft EIR as a responsible agency and provide clarification of potential Central Valley Water Board concerns and regulatory requirements regarding water quality.

Central Valley Water Board staff have the following comments.

Agcy 5-2

1. **Approach to Centennial Industrial Site Baseline**. Pages 1-3 through 1-7. The California Department of Toxic Substances Control (DTSC) is the lead regulatory agency for the Centennial Industrial Site Cleanup. Central Valley Water Board staff will assist DTSC with ensuring that the Centennial Industrial Site investigation and cleanup proceeds regardless of the status of the proposed Project.

Agcy 5-3

2. **RoWD and WDRs.** Pages 2-78-81. As indicated in Table 2-1 Mitigation Measures 4.8-1(a), (b), (c), (d) and 4.8-1(e), Rise Grass Valley will need to obtain several different permits from the Central Valley Water Board prior to beginning operations. This includes a permit for the water treatment plant discharge via submittal of a Notice of Intent (NOI) and obtaining a Notice of Applicability (NOA) in the Limited Threat Discharge Permit, submittal of a Report of Waste Discharge (RoWD) and obtaining Waste Discharge Requirements (WDRs) for both the surface impoundment and construction of the engineered fill areas prior to

discharging any mining waste[1], and submitting a NOI for coverage under the Industrial General Permit and prepare a Industrial Stormwater Pollution Prevention Plan. After receipt of the NOIs and RoWDs, Central Valley Water Board staff will evaluate the documents and their applicability for the appropriate permits when they are submitted. The Central Valley Water Board may require modifications to the water treatment system, surface impoundment and mining operations as well as monitoring to ensure the protection of water quality. All permitting requirements are expressly noted in the Draft EIR as mitigation measures. Under Water Code §13263.1, the Central Valley Water Board must determine that the proposed mining waste discharge is consistent with a waste management strategy that prevents the pollution or contamination of the waters of the state, particularly after closure of any waste management unit for mining waste, before issuing any permits.

3. **Ongoing Waste Characterization.** Under Water Code §13260(k), the RoWD must also include a report on the physical and chemical characteristics of the waste that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of the mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDRs will require continuous and routine characterization and classification (Cal. Code Regs., Tit. 27 §22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. Rise Grass Valley will need to address any changes in waste classification.

Agcy 5-4

Central Valley Water Board staff anticipate that to comply with Water Code §13260(k) and ensure protection of water quality as part of the RoWD/WDR process, the Central Valley Water Board will require Rise Grass Valley to prepare and implement a Waste Characterization Plan (Characterization Plan) comparable to the ASUR Plan[2] identified in the Draft EIR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDRs, these wastes will be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality.

[1] The Mining Waste Management Regulations define "mining waste" as "waste from the mining and processing of ores and mineral commodities. Mining waste includes: (1) overburden; (2) natural geologic material which have been removed or relocated but have not been processed (waste rock); and (3) the solid residues, sludges, and liquids from the processing of ores and mineral commodities." Cal. Code Regs., tit. 27, § 22480(a).
[2] Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan). See page 3-19 of the Draft EIR.

Mining waste that is characterized and classified as Group C (i.e., discharge of these wastes would be in compliance with water quality objectives other than turbidity) could be used as engineered fill[3] with limited regulatory restrictions. During the RoWD/WDR process, the Central Valley Water Board will establish the specific methods, volumes, and frequency of characterization and determine the appropriate requirements for the WDR.

4. **Engineered Fill.** Page 3-29 of the Draft EIR indicates that mining waste used as engineered fill would be considered a Group C mining waste. The language leaves the reviewer with the impression that because mining waste is used as engineered fill, it is considered a Group C mining waste. This is not correct. Mitigation Measure 4.8-1(e) provides a better summation of the accepted regulatory approach.

Agcy 5-5

Sand tailings, waste rock, backfill material, or other combinations being proposed for engineered fill will need to be characterized as Group C mining waste (e.g. page 4.8-50) prior to its use as engineered fill. Rise Grass Valley will need to characterize and classify mining waste in its correct California Code of Regulations Title 27 waste group, which will dictate how the waste must be managed, contained, or used. The Draft EIR should be revised to address this comment.

5. **Off-Site Sales of Waste Rock.** Page 1-7 of the Draft EIR states that "…*this EIR anticipates that waste rock from the Brunswick Industrial Site could also be sold as engineered fill to local and regional markets to be used as aggregate in roadway and construction projects*. For mining waste to be used for off-site purposes, Rise Grass Valley would first need to confirm that the waste would not pose a threat to water quality or that the potential threat to water quality could be mitigated (Cal. Code Regs., Tit. 27 §22480(c) and §22480(d)) for its proposed use. Rise Grass Valley will need to use the anticipated Characterization Plan to address this issue.

Agcy 5-6

Central Valley Water Board staff is somewhat concerned with the general assumption in the Draft EIR that a significant volume of the mining waste produced during the life of the Project will be suitable for off-site sale and use in local and regional markets as construction aggregate with limited regulatory restrictions (i.e., Group C mining waste). While the geochemical nature of the mining waste may prove to be suitable for construction aggregates, the alternative scenario that the mining waste is not suitable for off-site use should be examined. How would this affect the economic or operational aspects of the

[3] The use of mining waste as engineered fill is proposed for potential industrial pad development at the Centennial and Brunswick Industrial sites (Draft EIR, page 1-2) for the first 10-11 years of the Project and for local and regional markets for sale as construction aggregate and fill (Draft EIR, page 1-3) for the remainder of the Project.

Project? Rise Grass Valley should assess any operational constraints, such as not mining geological material that may produce water quality issues, challenges associated with the expanded use of cemented paste backfill[4] as a method of waste disposal, and the anticipated operational or economic costs resulting from the inability to utilize mining waste for off-site sale as construction aggregate. The Draft EIR should be revised to address this comment.

Agcy 5-7

6. **Clay Lined Settling Pond.** The Draft EIR indicates that the existing clay lined pond can be covered with a geomembrane liner to ensure seepage does not occur from the pond (Draft EIR, pages 2-79 and 3-17). While this proposal may meet minimum California Code of Regulations Title 27 prescriptive standards, it may not meet the potentially more stringent California Code of Regulations Title 27 performance standards. The Central Valley Water Board may require a more stringent design in a case where it concludes that the minimum design will not provide adequate protection to a given body of groundwater. The Central Valley Water Board will address this issue during the RoWD/WDR phase.

Agcy 5-8

7. **Water Quality Specific Financial Assurances.** While the Draft EIR references requirements for California's Surface Mining and Reclamation Act (SMARA) financial assurance(s), there will be water quality specific financial assurances for closure and post-closure maintenance of mining units as required by Title 27, section 22510. Although there is some discussion of potential overlap between the SMARA financial assurances (Draft EIR, page 4.8-30), water quality specific financial assurances will focus on water within the mine workings, groundwater, and mine water that ultimately discharges from the Project after mine closure. This may include the need for long-term water treatment of mine-related discharges. These financial assurances are separate and distinct from the SMARA financial assurances discussed in pages 3-42, 3-47, 4.8-30, and 4.9-20. This issue will be addressed during the RoWD/WDR phase.

Agcy 5-9

8. **Temporary or Short-Term Shutdowns.** Staff could not locate a discussion in the Draft EIR of temporary or short-term shutdown plans (Short-Term Shutdown Plan). Rise Grass Valley should anticipate temporary or short-term shutdowns over the life of the Project due to changes in economic conditions, technical issues, changes in management, etc. The WDRs will require that Rise Grass Valley prepare a Short-Term Shutdown Plan that identifies mitigation measures to protect water quality and the environment. The plan will include financial assurances to ensure that there are adequate funds to perform basic operations and maintenance until mining resumes or closure takes place.

Agcy 5-10

9. Staff could not locate a discussion in the Draft EIR on how the applicant intends to address/mitigate/ or take responsibility for any post-mining water quality issues. The Draft EIR should be revised to address anticipated post-mining

[4] Cemented paste backfill may/could be considered treatment under Title 27, section 22480(d).

water quality issues and whether the mine will require long-term oversight to ensure water quality conditions comply with applicable regulatory requirements.

Agcy 5-11

10. The Low-threat permit referenced throughout the Draft EIR has been rescinded. General Waste Discharge Requirements/NPDES Permit for Limited Threat Discharges to Surface Waters, Order R5-2022-0006/NPDES Permit No. CAG995002 was adopted on 17 February 2022.[5]

Please contact Jeff Huggins at (916) 464-4639 or Jeff.Huggins@waterboards.ca.gov with any questions regarding the contents of this letter. We are available to meet with you if you would like to discuss applicable Water Board requirements or potentially applicable permits.

John J. Baum

John Baum, P.E.
Assistant Executive Officer

cc: (by email only)

Ben Mossman, Chief Executive Officer Rise Grass Valley

[5] R5-2022-0006 Limited Threat Discharges to Surface Water - General Order (ca.gov)

AGENCY LETTER 5: JEFF HUGGINS, CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

Response to Comment Agcy 5-1

The comment is introductory and correctly assumes that the applicant will continue to proceed with County permits prior to seeking the necessary approval/permits from the Central Valley Water Board. Comment Noted.

Response to Comment Agcy 5-2

Comment Noted. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Agcy 5-3

The comment is informational in nature, generally summarizing the permitting requirements for the project and acknowledging that the requirements are identified in the EIR as mitigation measures. The County and applicant understand the Central Valley Water Board's role in the process and appreciate the comments.

Response to Comment Agcy 5-4

Report of Waste Discharge (RoWD) permitting requirements are set forth in Mitigation Measure 4.8-1(e) of the DEIR. In response to the comment, Mitigation Measure 4.8-1(e) is hereby modified in the Final EIR to include the commenter's clarifications on the requirements for ongoing waste characterization in the approved WDR.

Page 4.8-53, Mitigation Measure 4.8-1(e), is hereby revised, as follows:

> 4.8-1(e) The applicant shall submit a RoWD and obtain WDRs from the Central Valley RWQCB for construction of the engineered fill areas. The WDR permit shall be received by the applicant prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites. Proof of coverage shall be provided to the Nevada County Public Works Department. As part of this process, the RWQCB will determine the appropriate mining waste classification for the proposed engineered fill, and will consider the following factors: (1) whether the waste contains hazardous constituents only at low concentrations; (2) whether the waste has no or low acid generating potential; and (3) whether, because of its intrinsic properties, the waste is readily containable by less stringent measures. The engineered fill areas shall be constructed in accordance with the Title 27 specifications, pursuant to the mining waste classification determined by the RWQCB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the placement of fill or fill site preparation disturbance at the Brunswick Industrial Site and Centennial Industrial Site. <u>The RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant shall prepare and implement a Waste Characterization Plan (Characterization Plan) which shall be incorporated into the approved WDR. The purpose of the Characterization Plan is to</u>

> continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes shall be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e. sites other than the applicant's Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization shall be established in the approved WDR.

The above changes are provided in response to the comment for clarification purposes and do not alter the conclusions of the DEIR.

Response to Comment Agcy 5-5

Comment noted. Page 3-29 of the DEIR has been modified to delete the sentence, "as the engineered fill would be considered a Group C mining waste." , as shown below.

Mitigation Measure 4-8-1(e) has been modified to clarify the requirement that the applicant shall not sell or utilize waste rock and tailings from the project for construction aggregate or fill purposes offsite (i.e., sites other than the applicant's Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR which will establish the specific methods, volumes and frequency of characterization. See revised language of Mitigation Measure 4.8-1(e) in Response to Comment Agcy 5-4 above.

Page 3-29 of the DEIR is hereby revised as follows:

> The applicant will be required as part of the project to submit a Report of Waste Discharge (RoWD) and obtain Waste Discharge Requirements (WDRs) from the Regional Water Quality Control Board (RWQCB) for construction of the engineered fill areas~~, as the engineered fill would be considered a Group C mining waste.~~[3] Percolation of precipitation into the fill areas is expected to be minimal because the engineered fill would be graded and compacted to allow runoff to be conveyed to the detention basins. The WDRs would specify appropriate monitoring and limitations to prevent the discharge of water containing any constituents outside of applicable water quality standards.

The above minor change is provided for clarification purposes and does not alter the analysis, nor conclusions in the DEIR.

Response to Comment Agcy 5-6

Mitigation Measure 4.8-1(e) has been modified to clarify the requirements for a Characterization Plan in the approved WDR and Group C mining waste requirement for offsite material (See Response to Comment Agcy 5-5, and Response to Comment Agcy 5-4 for the revised mitigation measure language).

Economic costs are not required to be analyzed under CEQA. Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. Testwork performed on rock samples from the project site, and the specific process used to produce sand tailings indicate that the project's waste rock and sand tailings will meet Class C Mining Waste standards, such that the situation posed by the commenter is not reasonably expected to occur. Moreover, the project's ASUR plan includes advanced mine planning such that the mine operator will have core samples of rock material prior to mining in new areas of the project site with a

different rock chemistry. As such, the mine operator will have advanced information on rock chemistry and thus will be able to avoid mining in rock material that is unsuitable for construction aggregate, if large amounts of unsuitable material are unexpectedly discovered.

Please also see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Agcy 5-7

The comment does not address the adequacy of the DEIR. The County and applicant understand that the Central Valley Water Board will conduct review of the project, including the clay-lined pond, during the RoWD/DWR phase. Comment noted.

Response to Comment Agcy 5-8

The comment does not address the adequacy of the DEIR. The County and applicant understand that the Central Valley Water Board will conduct review of the project, including the noted financial assurances, during the RoWD/DWR phase. Comment noted.

Response to Comment Agcy 5-9

The comment does not address the adequacy of the DEIR. The County and applicant understand that the Central Valley Water Board will conduct review of the project, including the noted topic of temporary shutdowns, during the RoWD/DWR phase. Comment noted.

Response to Comment Agcy 5-10

As stated on page 4.8-51 of the DEIR, after mining is completed, and as underground mine workings fill with groundwater, water from the underground mine workings would begin to seep from the existing drains. The water that would seep from the underground workings is anticipated to have similar water quality to the water that currently discharges from the existing drains. Specifically, it may contain elevated levels of iron and manganese. Therefore, the conditions after mining is completed would be similar to existing, or baseline, conditions, such that re-activation of the seeps would not represent a potentially significant impact under CEQA. The mine operator will work with the CVRWQCB at the time of mine closure to implement any measures that may be required at that time to address re-activation of the existing baseline condition seeps.

Response to Comment Agcy 5-11

In response to the comment, relevant sections of Chapter 4.4, Hydrology and Water Quality, of the DEIR are hereby revised in this FEIR reference the current Order R5-20022-006 for NPDES Permit No. CAG995002, as follows:

Page 4.8-28, Section 4.8.3, Regulatory Context, is hereby revised as follows:

> General Permit for Limited Threat Discharges to Surface Waters
>
> The Limited Threat General Order (R5-~~2016-0076-01~~2022-0006) is a general Waste Discharge Requirements permit for Limited Threat Discharges to Surface Water. The discharge of treated water from the proposed mine into South Fork Wolf Creek is anticipated to be covered as a Tier 3 discharge of hard rock mine wastewater. Under Table 3 of the Limited Threat Discharge permit, Tier 3 discharges to surface water that are greater than 250,000 gpd (greater than 175 gpm) and/or that are longer than four months are allowed if the water to be discharged (with or without treatment) meets the applicable screening levels in the permit.
>
> Effluent limitations are listed in Section V and screening levels are listed in Attachment I of the Low Threat Discharge permit. Rise will be required to file a Notice of Intent (NOI) for

coverage under the Limited Threat Discharge permit, which will include a detailed description of the dewatering, treatment, and discharge components of the project. A Monitoring and Reporting Program (MRP) will also be required pursuant to the General Order, Attachment C. The MRP will specify monitoring station locations, sampling frequencies and methods, and monitoring report submittal requirements to the Regional Board.

Page 4.8-45, Section 4.8.4, Impacts and Mitigation Measures, Impact 4.8-1, is hereby revised as follows:

Ongoing monitoring of influent and effluent (i.e., treated water) will be required by the State, in order for the applicant to receive coverage under the State's Limited Threat Discharge Permit (General Order R5-~~2016-0076~~2022-0006; NPDES No. CAG995002). Monitoring of treated water would occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek. The owner will be required to submit quarterly monitoring reports to the State RWQCB, demonstrating compliance with the maximum daily effluent limitations specified in Section V of the NPDES permit. Compliance with the water quality standards and waste discharge requirements in Order No. R5-~~2016-0076~~2022-0006 would prevent any degradation of surface water quality due to dewatering.

Page 4.8-52, Mitigation Measure 4.8-1(a), first sentence, is hereby revised as follows:

4.8-1(a) *The applicant shall submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-~~2016-0076~~2022-0006; NPDES No. CAG995002), at least six months prior to construction of the water treatment system; and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin and provided to Nevada County Planning Department.*

Page 4.8-79, Impact 4.8-6, first paragraph, is hereby revised as follows:

The current water quality control plan for the region is the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, which is also referred to as the Basin Plan (CVRWQCB, 2019). The project would be required to operate under an applicable WDR permit from the CVRWQCB for placement of any waste material on land. The dewatering discharge to South Fork Wolf Creek would also need to comply with the requirements of the applicable NPDES permit Order R5-~~2016-0076~~2022-0006 (NPDES No. CAG995002) for Limited Threat Discharges to Surface Water as a Tier 3 discharge. The WDR and NPDES requirements ensure that the project would not conflict with or obstruct implementation of the Basin Plan.

The above minor changes are for clarification purposes and do not alter the adequacy of the analysis contained in the DEIR, nor its conclusions.

Agency Letter 6

State of California **Transportation Agency**

M e m o r a n d u m

Governor's Office of Planning & Research
Feb 16 2022
STATE CLEARING HOUSE

Date: February 16, 2022

To: Special Projects Section

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Grass Valley Area

File No.: 230.14307.

Subject: ENVIRONMENTAL DOCUMENT RESPONSE SCH# 2020070378

Agcy 6-1 After reviewing the draft environmental impact report for the Idaho-Maryland Mine project proposed for Nevada County, I do not believe there would be any impact to local Area operations or public safety. The general area may see a very slight increase in commercial vehicle traffic.

Agcy 6-2 The proposed underground mining operations would be offset from the roads and will primarily be operating within its own boundaries.

G. STEFFENSON, Lieutenant
Commander

Safety, Service, and Security ***An Internationally Accredited Agency***
CHP 51 (Rev. 03-11) OPI 076

AGENCY LETTER 6: G. STEFFENSON, DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

Response to Comment Agcy 6-1

The commenter states that the project would have no impact to local Area operations of the California Highway Patrol or public safety, and that the general area may see a very slight increase in commercial vehicle traffic. Comment noted.

Response to Comment Agcy 6-2

The commenter states that proposed underground mining operations would be offset from the roads and primarily operate within its own boundaries. Comment noted.

Agency Letter 7

Jared Blumenfeld
Secretary for
Environmental Protection

Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

March 30, 2022

Mr. Matt Kelley
Senior Planner
Nevada City
950 Maidu Avenue, Suite 170
Nevada City, CA 95959
Matt.Kelley@co.nevada.ca.us

COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE IDAHO-MARYLAND MINE PROJECT – DATED DECEMBER 2021 (STATE CLEARINGHOUSE NUMBER: 2020070378)

Dear Mr. Kelley:

The Department of Toxic Substances Control (DTSC) received the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project (Project). The Lead Agency is receiving this notice from DTSC because the Project includes the possible use of the nearby Centennial M-1 property as a repository for mine waste if the Project proceeds.

Agcy 7-1

The owner of the Centennial M-1 property is under a voluntary cleanup agreement with DTSC to address existing mine waste at this site via a remedial action plan that is currently under review. If approved, the cleanup of the Centennial M-1 site includes consolidating existing mine waste with contaminant concentrations above commercial/industrial cleanup levels and encapsulating this material on the property with on-site soils that are protective of human health under the anticipated commercial/industrial future use. In addition, the protective surface soils will be graded to ensure runoff is directed away from the encapsulated material and towards a retention basin that will also be constructed to protect Wolf Creek which is located nearby.

Agcy 7-2

To ensure the long-term safety and integrity of the proposed remediation, any waste rock brought to the Centennial M-1 site from the Idaho-Maryland Mine must be sampled to ensure it meets the cleanup levels for the Centennial M-1 site achieved during the

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cleanup effort. In addition, the material must be placed in such a way as to ensure the integrity and function of the cap to direct surface water away from the buried contamination. The protocol and frequency of sampling waste material from the Idaho-Maryland Mine and the frequency of inspections of the Centennial M-1 site have yet to be determined. These efforts may be outlined in the Operation and Maintenance (O&M) Agreement with DTSC that will be a part of the Centennial M-1 remediation or they be approved in a separate stand-alone document. Any specifications, work plans, or reports regarding placement of material on the Centennial M-1 must be reviewed and approved by DTSC under an O&M or other agreement with DTSC. DTSC is providing this letter to ensure the County is aware of these general requirements as they do not appear to be discussed in the DEIR.

DTSC appreciates the opportunity to review and comment on the DEIR for the Project. If you have any questions, please contact me at (916) 255-3591 or via email at Dean.Wright@dtsc.ca.gov.

Sincerely,

Dean Wright
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Ms. Lora Jameson, P.G., Chief
DTSC/Site Evaluation and Remediation Unit
Lora.Jameson@dtsc.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

AGENCY LETTER 7: DEAN WRIGHT, DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Response to Comment Agcy 7-1

The commenter provides information on the voluntary cleanup agreement for the Centennial site. Comment noted. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Agcy 7-2

The commenter states that waste rock brought to the Centennial site by the project must be sampled to ensure it meets the cleanup levels for the Centennial site and that the material must be placed in such a way to ensure the integrity and function of the cap to direct surface water away from the buried contamination. The protocol and frequency of sampling waste material from the project will be outlined in the Operation and Maintenance (O&M) agreement between the applicant and DTSC. Comment noted. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Agency Letter 8

CITY OF GRASS VALLEY
Community Development Department
Thomas Last, Community Development Director

125 East Main Street
Grass Valley, CA 95945

Building Division
530-274-4340
Planning Division
530-274-4330
530-274-4399 fax

Date: March 30, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us

RE: COMMENTS ON THE IDAHO-MARYLAND MINE PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (DECEMBER 2021) (SCH# 2020070378), NEVADA COUNTY, CALIFORNIA

Dear Mr. Kelley:

Agcy 8-1

The City of Grass Valley has completed review of the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project (IMMP) and prepared the following comments. In summary, the DEIR is extraordinarily long (over 1,000 pages not including technical appendices), and much of its contents are very thorough. In addition to my review, the City was assisted in its review by Dr. Jeff Harvey, Ph.D., Principal & Senior Scientist with the Harvey Consulting Group for CEQA adequacy, Project Description, Hydrology and Alternatives topics. Paul Miller, Principal and Senior Air Quality and Noise Analyst, and Dan Jones, Senior Air Quality and Noise Analyst with The RCG Group for the Air Quality, Greenhouse Gas Emissions, Health Risks and Noise topics, and John Kain, AICP, Principal and Senior Transportation Planner, and Marlie Whiteman, P.E., Senior Transportation Engineer, with Urban Crossroads, Inc. for the Transportation and Vehicle Miles Travelled topics.

As detailed in our comments below, key aspects of this proposed 80-year mining and industrial development project – including air quality, greenhouse gases and traffic, and consideration of alternatives that may reduce or avoid potentially significant impacts to the City and surrounding County areas – are not accurately or adequately assessed. Corrections needed to these analyses are very likely to conclude with findings of greater impact levels than are now reported, and therefore a need for additional mitigation measures, and/or consideration of other project alternatives. This letter highlights technical inadequacies of the DEIR based on the CEQA statute, CEQA Guidelines and published court decisions interpreting CEQA.

CHAPTER 3: PROJECT DESCRIPTION

Agcy 8-2

PD-1) The applicant's request for an 80-year permit is extraordinary and makes this truly a multi-generational project. It is reasonable to expect that a lot is going to change in 80 years, possibly including mining methods, regulatory standards, market demand for gold, transportation methods and more. The County needs to consider a shorter permit time period, with an ability to renew the permit based upon an updated environmental review that reflects conditions and standards decades in the future. We suggest 30-years maximum permit period, which is still a major commitment to a single large industrial use. In addition, the County should consider a condition of approval requiring an Adaptive Management Process under which the project gets reviewed periodically (every 10 years), with additional environmental compliance and mitigation requirements added to the permit conditions as needed.

Agcy 8-3

PD-2) Likewise, the size of the project needs to be reconsidered. The 1,000 tons per day goal may be optimal for the applicant, but it is not optimal for the community as it requires off-site hauling through community areas and the City in 20 to 25 ton trucks from 6:00 AM to 10:00 PM seven days per week for 80 years. We recommend a cap of 500 tons per day or less, and no nighttime hauling activity. This would reduce truck traffic generation, noise, air quality and greenhouse gas emissions, energy and fuel use, and the volume of residual material to be disposed of by half – a very significant reduction in the impacts of this proposed industrial operation.

Agcy 8-4

PD-3) The proposed hauling operations need to clearly note that this part of the operation will include the loading, dumping, spreading, and compacting of waste materials. (See related comment in the Noise section below). Page 3-40 of the DEIR states "Hauling and dumping of engineered fill at the Centennial Industrial Site would occur between 6:00 AM – 10:00 PM." The hauling and dumping of engineered fill are construction activities that are intended to create industrial development pads rather than a mining activity, and as such, should be limited to the construction hours of the City's Noise Ordinance (prohibits construction noise between the hours of 7 pm and 7 am, or on Sundays) and should discuss how this proposed plan affects the goals of the Safety and Noise Elements of the County's General Plan, rather than just mentioning it on page 3-2.

Agcy 8-5

PD-4) The County may also consider splitting the Centennial Site operations off as a separate project and conduct environmental review and permitting independently. If the engineered fill can be used for deep mine backfill or transported to local and regional markets for use in construction projects (DEIR, page 3-26), the backfill at the Centennial Industrial Site does not need to be a component of the mining operation.



Agcy 8-6	PD-5)	On page 3-18 in the discussion of the water treatment process and system it is noted that monitoring reports are required to be submitted quarterly. Please include the timing intervals for monitoring samples to be obtained. We suggest that at a minimum sampling should be done monthly for at least the first year, and quarterly thereafter if the first-year results demonstrate compliance with the maximum daily effluent limitations.
Agcy 8-7	PD-6)	On page 3-19 in the third paragraph of the discussion of Mine Development (Tunneling) it is stated that the underground transport of barren rock will be done using electric or diesel-powered load/haul/dump vehicles. We suggest that the County should require all such vehicles to be electric-powered so that diesel exhaust emissions underground are eliminated.
Agcy 8-8	PD-7)	On page 3-19 in the second paragraph of the discussion of Gold Mineralization Production, it is stated that 50 percent of mineralization would be returned to the underground mine as backfill, and the remainder would be used as engineered fill. This is not for the life of the project, as the engineered fill process only extends an estimated 5 to 12 years for the Centennial and Brunswick sites. Please describe what happens to the additional 50 percent (over 150,000 tons per year) for the tens of decades after the engineered fill is completed.
Agcy 8-9	PD-8)	On page 3-21 in the second paragraph of the discussion of the ventilation exhaust system and underground support systems, please confirm that these include back-up generators and an alarm system in the event of a power outage.
Agcy 8-10	PD-9)	Starting on page 3-26 in the discussion of Engineered Fill Transport, it is stated that engineered fill would be stored at the Brunswick site and/or transported to local and regional construction markets. Like gold, the market for engineered fill can fluctuate substantially over periods of years. There needs to some defined maximum volume that can be stored at the Brunswick site, the storage method described, and a discussion of what happens when "local and regional construction markets" have low demand for these fill materials for a prolonged period of time.
Agcy 8-11	PD-10)	On page 3-28 in the first paragraph of the discussion of explosives, it is stated that the explosives supplier will have a "sufficient" insurance policy. Please define the term "sufficient" in this context and provide details regarding the events that will be covered so the sufficiency of the insurance may be accurately assessed.
Agcy 8-12	PD-11)	On page 3-33 in the first paragraph of the discussion of the Potable Water Pipeline, please confirm that the pipeline construction and extensions to willing residents will occur prior to the commencement of dewatering of the mine.

Agcy 8-13

PD-12) On page 3-42 in the discussion of Mine Rescue and Emergency Response, please confirm that the mine-rescue team will be a part of the mining workforce on site.

Agcy 8-14

PD-13) On page 3-42 in the discussion of the Reclamation Plan, (and in Table 3-10 on page 3-46) the County should require that reclamation include demolition and removal of the above ground facilities and structures, subject to review if the buildings are inspected and determined to be of commercial value. These facilities and structures will be decades old at the time of reclamation and are unlikely to be in a condition that supports unknowable post-mining industrial uses of the property.

Agcy 8-15

PD-14) On page 3-52 in Table 3-11, a fact check: we believe that the RWQCB rather than the SWRCB Division of Water Rights has jurisdiction for all six of the permits listed for those agencies.

CHAPTER 4.3: AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Agcy 8-16

AQ-1) The DEIR and Health Risk Assessment lack details of sensitive receptors that were considered for evaluating potential localized health impacts from the project. Page 4.3-11 of the DEIR states "At the Brunswick Industrial Site, rural residences are located to the north, west, east, and south. The nearest residence is north of East Bennett Road, approximately 100 feet from the Brunswick Industrial." Page 4.3-79 of the DEIR states "The maximally exposed receptor was estimated to be the nearest existing residence, which is north of the Brunswick Industrial Site." However, there is no map, figure, or other detailed information showing the sensitive receptors that were considered for evaluating potential localized health impacts from the Project in the DEIR or in the Air Quality and Greenhouse Gas Emissions Analysis Technical Report (Dudek, 2020). This information should be added in the Recirculated Draft EIR.

Agcy 8-17

AQ-2) The analysis of whether the project would result in wasteful, inefficient, or unnecessary use of energy is inadequate. CEQA Guidelines Section 15126.2, regarding the discussion of energy impacts, states: "*This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation.*" The discussion of Impact 4.3-4 (beginning on page 4.3-86) of the DEIR does not disclose the estimated fuel usage (gasoline and diesel) from mobile sources (off-road equipment and on-road transportation sources) associated with construction and operation of the Project. This information should be included to disclose the scale of the Project's usage of petroleum fuel sources. (See Ukiah Citizens for Safety First v. City of Ukiah, (2016) 248 Cal.App.4th 256). The discussion of Impact 4.3-4 should be enhanced to discuss whether this amount of energy usage would be considered wasteful, inefficient, or unnecessary.

AQ-3) The analysis of whether the project would conflict with a State or local plan for renewable energy or energy efficiency is inadequate. Page 4.3-88 of the DEIR states that that the Project would consume approximately 50,000 MWh annually during the 80-year operational life of the Project. Page 4.3-88 of the DEIR states that the Project would be served primarily by grid-supplied electricity, except under conditions when emergency power is required, and standby diesel generators would be used.

Agcy 8-18

According to the Nevada County Energy Action Plan (EAP), Nevada County's total consumption in 2017 was approximately 344,000 MWh.[1] The Project's annual energy use would represent an increase of approximately 15 percent in County-wide electricity usage for a single industrial use. As noted on Page 4.3-40 of the DEIR, "*One of the central goals of the EAP is to reduce the projected annual grid supplied electricity use in 2035 by 51 percent…compared to a baseline from the year 2005*." The Project would result in a substantial long-term increase in grid supplied electricity consumption in the County which conflicts with the Nevada County EAP. This energy use should be recognized as a significant impact of the proposed project and mitigation should be incorporated to reduce this impact.

AQ-4) The cumulative energy use impact discussed in 4.3-9 (Page 4.3-102) of the DEIR is difficult to differentiate from the project-level energy analyses (Impacts 4.3-4 and 4.3-5). The impact heading and significance determination statements are written as if they are discussing project-level impacts. The discussion needs to be enhanced to describe the potential cumulative energy use impacts of the Project when viewed together with the energy use of past, present, and reasonably foreseeable future projects.

Agcy 8-19

AQ-5) The DEIR lacks mitigation measures for project operations. Page 4.3-67 of the DEIR states "*According to the NSAQMD, unmitigated project generated emissions of ROG NO_X and PM10 that are greater than zero are potentially significant and require mitigation.*" Table 4.3-17 (Maximum Unmitigated Daily Project Emissions) notes that all operational phases of the Project would be potentially significant for ROG, NO_X and PM10 and Page 4.3-70 of the DEIR states "*As shown in Table 4.3-17, daily unmitigated emissions of ROG, NOx and PM10 would be potentially significant (Level A or B) according to the NSAQMD significance criteria; therefore, mitigation is required.*"

Agcy 8-20

However, no mitigation measures were implemented for the operational phases of the Project. The NSAQMD states in their *Guidelines for Assessing and Mitigating Air Quality Impacts of Land Use Projects* (*Guidelines*) that "*The lead agency should contact the District office to discuss the mitigations before the lead agency*

[1] Nevada County Energy Action Plan, Accepted by Board of Supervisors 5-0 February 12th, 2019, accessed at: https://www.mynevadacounty.com/DocumentCenter/View/35183/Nevada-County-Energy-Action-Plan

commits to a final mitigation plan for each project." Since the Idaho-Mine Project is not a typical land use project for which the *Guidelines* are intended for and no mitigation measures from the *Guidelines* are applicable to the operational phases of the Project, the NSAQMD should have been (and should be) consulted to discuss mitigation measures that could be applicable to Project operation. The DEIR does not cite any correspondence with the NSAQMD. Thus, it is unclear if the Project will implement mitigation required to reduce potentially significant operational air quality impacts to less than a significant level or require a statement of overriding considerations.

Agcy 8-21

AQ-6) The issues addressed above need to be corrected in the Recirculated DEIR as the corrections will result in "Significant New Information" per Section 15088.5 of the CEQA Guidelines.

CHAPTER 4.8: HYDROLOGY AND STORMWATER

Agcy 8-22

HS-1) The City of Grass Valley is concerned about stormwater flows in the South Fork of Wolf Creek channel that extends through the City and has very limited capacity under baseline conditions. In the discussion of surface water runoff beginning on page 4.8-69, it states: "*The proposed detention basins would hold back the peak flows and release the water at a lower rate and at a later time than currently occurs from those site areas. As a result, the project would reduce peak storm flows in both Wolf Creek and South Fork Wolf Creek.*" This conclusion is based upon a preliminary hydrology assessment and a peer review of that assessment and appears to have been well done. The potential stormwater impact is recognized as significant, and the mitigation measure 4.8-3 (page 4.8-76) is formulated to reduce the potential to "less than significant". The measure requires development of a "Final Drainage Report" which shall be submitted to the Nevada County Planning Department and "*…shall demonstrate that the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed predevelopment levels in the downstream channel(s) during the design storm events.*" Due to the importance of this issue to the City, and the significance of this potential impact, we request the County add a requirement for the Final Drainage Report to also be submitted to the City's Engineer for review and comment.

CHAPTER 4.9 LAND USE

Agcy 8-23

LU -1) The DEIR fails to acknowledge the applicable City's General Plan as required by Nevada County General Plan Land Use Policies 1.8.1, 1.8.3, 1.8.5, and 1.8.6., and needs to acknowledge that the proposed project is located within the City's adopted Sphere of Influence. The DEIR, which mentions the County's General Plan on page 3-2, should have discussed and analyzed the above-noted policies and the City's General Plan to determine whether those County policies will conflict with, or result in significant land use impacts on, the City.

CHAPTER 4.10: NOISE AND VIBRATION

Agcy 8-24

NV-1) The noise and vibration mitigation measures lack timing. Mitigation Measure 4.10-4 lacks specific timing requirements for implementation. Mitigation Measure 4.10-4 should be revised to include timing for implementation and require the Ground Vibration Monitoring Program to be developed prior to operation of the mine. The Ground Vibration Monitoring Program should require seismographs to be placed in accordance with the recommendations of the Blasting Report prepared by Precision Blasting Services (i.e., different requirements for different blasting depths). Furthermore, the results of the Ground Vibration Monitoring Program should be required to be submitted to the Nevada County Planning Department for review in a timely manner, reasonable to the County and applicant, to allow for adjustments in project conditions of approval, if warranted by the monitoring data.

Agcy 8-25

NV-2) A Recirculated DEIR needs to acknowledge that the hauling operations will include loading and dumping of trucks, and the spreading and compacting of this material. Those are standard construction operations that are tied to the proposed development of pad sites for future industrial use and would occur well beyond standard construction operational hours in most communities and be in violation with the City's noise ordinance that prohibits construction activities that generate significant noise between the hours of 7 pm and 7 am, or on Sundays within 500 feet of a residential zone. Although there are no residential zones within 500 feet of the Centennial site, there are homes in the area and the loading and unloading of material will generate noise. A Recirculated DEIR needs to address any potential conflict with the County's General Plan Safety and Noise Element adopted in October 2014 and the City's Noise Ordinance to adequately address the noise levels to be generated by the full hauling operations. The DEIR needs to fully disclose that the Centennial site operations and site preparation will occur well beyond any typical construction operation and likewise the resulting long-term noise impacts.

Agcy 8-26

NV-3) A five or more years-long operation that is active seven days a week and 16+ hours a day cannot be reasonably dismissed as a "temporary noise impact" as it is in section 4.10-1 and on page 4.10-32. It is only short term relative to the requested 80-year mining permit. These noises will reverberate thought the adjacent valleys and hills every day and for many years when other construction activities are not allowed or limited. The impacts must be articulated and mitigated

Agcy 8-27

NV-4) Table 4.10-6 is listing Leq values as Lmax and vice versa, for Baseline Ambient Conditions for the Nighttime Column.

CHAPTER 4.12 TRANSPORTATION

EIR TRAFFIC SECTION COMMENTS

Agcy 8-28

T-1) ***Figure 4.12-4 and related LOS analysis / tables*** incorporate stop signs on Idaho Maryland Road that don't exist (intersection 20) – these are also included in the LOS analysis. Please update the figures in the EIR and TIA, along with the LOS analysis and related tables.

Agcy 8-29

T-2) ***Vehicle Miles Traveled Standard of Significance*** (page 4.12-27) indicates that VMT impact may be considered less than significant if the Project total weekday VMT / Service Population is equal to or less than 14.3 percent below the subarea mean under baseline conditions and the Project is consistent with the jurisdiction's General Plan. Grass Valley was used as the subarea, which has a Home-Based VMT per worker of 18.6. The 18.6 Grass Valley VMT standard (Table 4.12-4) appears to be sourced from Table A-3 of the Senate Bill 743 Vehicle Miles Traveled Implementation (Fehr & Peers, July 6, 2020). However, the Home-Based Attraction VMT per Employee presented in Table A-4 of the same document which addresses "issues with trip lengths for trips with origins or destinations outside the model" and other known trip issues is 13.1 for Grass Valley. Because the 13.1 value addresses trip issues, please update the standard to reflect this value.

Agcy 8-30

T-3) ***Table 4.12-8*** presents Project Trip Generation which includes automobiles and trucks but does not reflect passenger car equivalents (PCEs). To represent the impact that large trucks, buses and recreational vehicles have on traffic flow; trucks should be converted into PCEs. By their size alone, these vehicles occupy the same space as two or more passenger cars. In addition, the time it takes for them to accelerate and decelerate is also much longer than for passenger cars and varies depending on the type of vehicle and number of axles, particularly when considering the topography of the roads proposed for the haul route. Typical PCE factors are 1.5 for 2-axle trucks, 2.0 for 3-axle trucks and 3.0 for 4+-axle trucks. Please update trip generation to reflect truck PCEs.

Agcy 8-31

T-4) The issues addressed above need to be corrected in the Recirculated DEIR as the corrections will result in "Significant New Information" and are very likely to identify "A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." per Section 15088.5 of the CEQA Guidelines.

Agcy 8-32

T-5) Page 4.12-35: The Existing Plus Approved Projects Conditions assumption fails to mention two approved projects in the City. The City approved Loma Rica Specific Plan amendments in 2019 and the Dorsey Marketplace project in 2020, well before

the release of the NOP. The City specifically noted these projects in its March 18, 2020, letter to Nevada County (copy attached), and again requests these projects to be included and taken into consideration.

T-6) There is no mention within the Cumulative Impacts chapter or any traffic analysis of the City's General Plan Circulation Element's planned new road on the Centennial site that would connect Bennett and Idaho-Maryland Road. The City has requested this issue be addressed in multiple letters to the County (copies attached). This road connection is highly likely to change the impact conclusions in Impact 4.12-9.

Agcy 8-33

TIA COMMENTS

TIA-1) ***Table 11*** of the TIA references daily trips (maximum and average) but does not indicate any truck to automobile equivalency (passenger car equivalent) factors to represent the trucks heavy vehicle effect on the roadway system. Truck traffic should be adjusted to PCEs (or otherwise fully represented) for analysis purposes.

Agcy 8-34

TIA-2) Please convert trucks to PCEs for LOS analysis OR update heavy vehicle factors. Heavy vehicle percentages in the LOS worksheets indicate 2% to 5% heavy vehicles (most are 2%). The ***appendix page labeled HCM 6th Signalized Intersection Summary MITIG8 Cumulative plus Project PM Peak 14: E. Bennett Rd/Brunswick Rd*** includes 2% Heavy Vehicle factor. However, Section XI (Acceleration on Grade) states that along Brunswick Road:

"Trucks currently account for about 6% of all traffic between SR 49 and SR 174, with the truck traffic increasing to about 9% between Whispering Pines Lane and E. Bennett Road. Trucks also account for about 8% of traffic along Whispering Pines Lane. "

Agcy 8-35

TIA-3) ***Tables 14A, 14B, 17A, 17B, 20A, 20B, 23A, 23B, 26A, 26B*** should be updated to reflect LOS analysis results with trucks fully represented.

Agcy 8-36

TIA-4) ***Tables 15A, 15B, 18A, 18B, 21A, 21B, 24A, 24B, 27A, 27B***: should be updated to reflect queuing analysis once trucks are fully represented. The TIA indicates "It is assumed that one additional vehicle (25') can store in the available left or right turn taper and this occurs at six locations". Overflow trucks may be significantly longer than 25' – please update to fully account for trucks.

Agcy 8-37

TIA-5) ***Section II.4 Findings/Results of the TIA*** indicates the Project generated VMT result is 14.7 for 2012 Base Year and 13.9 for 2035 Future Year. The TIA states that because 13.9 is less than the 18.6 average for Grass Valley, there is no VMT impact. However, VMT impacts are calculated on baseline conditions.

Agcy 8-38

Interpolation between 14.7 for 2012 and 13.9 for 2035 indicates the Project generated VMT would be 14.4 in 2020. The Grass Valley VMT/SP is 13.1 (a reduction of 14.3% results in a threshold of 11.2). The interpolated 2020 VMT/SP of 14.4 is more than the threshold and an impact is found. Please update the VMT findings.

Agcy 8-39

TIA-6) ***Maps such as Figure 4.12-1*** of the EIR / Figure 3 of the TIA should be corrected/adjusted (ramps are missing). For example, the off ramp at intersection 9 is missing, as is the on-ramp at intersection 5. In addition, Bennett Street is misspelled.

Agcy 8-40

TIA-7) For the ***intersection graphics such as Figure 4.12-2*** which make up the bulk of the traffic figures, please clarify the orientation of street intersections. For example, at intersection 20, it appears that Idaho Maryland Road (the east/west street) is listed first, but at intersection 21, Sutton Way (the north/south street) is listed first.

CHAPTER 6: ALTERNATIVES ANALYSIS

Agcy 8-41

ALT-1) The City understands that the formulation of alternatives must consider the applicant's goals and objectives for the project, but that consideration is limited as explained in the CEQA Guidelines Section 15126.6[b]:

"*Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1),* ***the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*** (Emphasis added.)

In this case, the applicant's objective that the project's production rate should be 1,000 tons per day is a speculatively large number chosen by the applicant based upon estimates of recoverable gold that could be extracted over an 80-year time period. The County has no obligation to maximize production, and particularly if it can only be accomplished by decades of significant effects on the local community related to truck traffic generation, noise, air quality and greenhouse gas emissions, energy and fuel use, and a huge volume of disposed residual material. Because of this, the obvious environmentally superior alternative is the Reduced Throughput alternative with a production rate of 500 tons per day, which is still a very significant mining project, and would substantially lessen the significant effects of the project. The assumption that this alternative would result in an extension of the project's operations timeframe to "between 130-160 years" is unsubstantiated and is based entirely upon an assumption the mine can only be financially feasible if it

allows full development of the underground resources – an assumption for which there is no evidence in the record.

ALT-2) As noted in Project Description comments above, the applicant's objective that the project's permit term needs to be 80-years is extreme, and unprecedented in California. The County has no obligation to maximize the permit term due to the applicant's estimate of project feasibility recoverable gold to be extracted over 80-years. This is particularly so due to the nature and magnitude of significant effects on the local community related to truck traffic generation, noise, air quality and greenhouse gas emissions, energy and fuel use, and the volume of residual material to be generated and disposed. In this case, an obvious alternative to consider is a Reduced Throughput and Thirty-Year Permit alternative, which is still a very significant mining project, and would substantially lessen the long-term significant effects of the project.

Agcy 8-42

ALT-3) The assessment of alternatives 2 (Expansion of Brunswick Fill Pile) and 3 (Expansion of Centennial Fill Pile) is entirely predicated upon the assumption that the 1,000 tons per day objective needs to be attained, leading to conclusions that are inadequate and conclusory in nature. There is no support for the extraordinary expansion of fill piles. There is no need to expand the fill piles to the detriment of the benefits of the engineered fill if, as described elsewhere in the EIR, the materials can be used as backfill for the mine, and or transported "for use in local and regional construction markets" (DEIR, page 3-26).

Agcy 8-43

ALT-4) Page 6-3 aesthetics is listed as a less than significant impact, but on page 6-7, aesthetics is listed as a significant and unavoidable impact that cannot be fully mitigated, requiring the County to adopt a statement of overriding considerations if the project is to be approved.

Agcy 8-44

CONCLUSIONS

C-1) Collectively, the inadequacies identified in our review support our conclusion that rather than simply responding to comments, the County needs to substantially revise these analyses to repair the deficiencies, and prepare a Recirculated Draft EIR pursuant to CEQA Guidelines §15088.5, which states in part (applicable text in bold italics):

Agcy 8-45

15088.5. RECIRCULATION OF AN EIR PRIOR TO CERTIFICATION

(a) ***A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification.***

As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

(1) ***A new significant environmental impact would result from the project*** or from a new mitigation measure proposed to be implemented.

(2) ***A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance***.

(3) ***A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.***

(4) ***The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded***. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

[Note: Authority cited: Section 21083, Public Resources Code. Reference: Section 21092.1, Public Resources Code; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112.]

The issues addressed above need to be corrected in the Recirculated DEIR as the corrections will result in significant new information" per Section 15088.5 of the CEQA Guidelines, are likely to findings of a substantial increase in the severity of an environmental impact. The Recirculated DEIR should give serious consideration to a much shorter permit timeframe, reduced throughput, and with a condition of approval requiring an Adaptive Management Process under which the project gets reviewed periodically (every 10 years), with additional environmental compliance and mitigation requirements added to the permit conditions as needed. It should also consider treating the Centennial site backfill as a distinct project independent of the mining project.

We appreciate your serious consideration of our comments. As I am sure you are aware, this a very significant project that has the potential to affect the City of Grass Valley and the surrounding community in Nevada County through the end of this century. Please don't hesitate to call me if you have any questions or need additional information.

Sincerely.

Thomas Last
Community Development Director
City of Grass Valley

Phone: (530) 274-4711
Email: toml@cityofgrassvalley.com

Attachments:

A. Referenced City letters sent to the County regarding the IMMP
B. Technical Review Team Resumes

CITY OF GRASS VALLEY COMMENTS ON
THE IDAHO-MARYLAND MINE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
(DECEMBER 2021) (SCH# 2020070378)
NEVADA COUNTY, CALIFORNIA

ATTACHMENT A:

REFERENCED CITY LETTERS SENT TO THE COUNTY REGARDING THE IMMP

CITY OF GRASS VALLEY
Community Development Department
Thomas Last, Community Development Director

125 East Main Street
Grass Valley, CA 95945

Building Division
530-274-4340
Planning Division
530-274-4330
530-274-4399 fax

March 18, 2020

Matt Kelley, Senior Planner via email also
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

RE: Comments on the Traffic Impact Analysis for the Rise Grass Valley mining project.

Dear Mr. Kelley:

Thank you for the opportunity to provide comments on the draft report. The following comments raise several concerns with the traffic study. Since this project will have many direct impacts on City streets and intersections, the City strongly encourages the County to consider and require these comments to be properly addressed.

1. In general, the report is extensive, and the City would like to have had more time to evaluate the report in more detail.
2. Traffic Index (TI) analysis for Whispering Pines requires further explanation. Even over a 5-year period a four-axle truck equates to 1470 ESAL according to the KDA chart. If there are 114 (4 axle) trucks per day this would be 167,580 ESAL which should easily move the TI up at least 0.5 Regardless Whispering Pines Rd was not constructed to handle heavy industrial traffic, let alone act as a haul route, and is nearing the end of its useful life already. Putting 114 heavily loaded trucks a day on this road will cause it to fail well before a 5-year period. This project needs to be conditioned to enter into an agreement with the City to ensure long-term pavement maintenance occurs on all haul road streets and to cover all costs associated with upgrading from the current TI on Whispering Pined Lane to an appropriate TI.
3. TI analysis for Brunswick requires further explanation. How can one section (E Bennett to Whispering Pines) show an increase, but not the other (Whispering Pines to SR49) that is already in a lower TI? How can 5880 ESAL x 114 trucks = 670,320 ESAL not increase the TI to at least the next step? As we have noted in previous letters, the applicant will be required to enter into a maintenance agreement with the City to pay for roadway maintenance and improvements and shall cover all costs associated with upgrading from the current TI to an appropriate TI.
4. LOS calculations are not consistent with any recently accepted traffic studies (Dorsey Marketplace or Loma Rica Specific Plan, specifically). The majority of intersections analyzed in the Rise Mine ITA are already failing or already identified to be failing under previous Existing plus Approved Projects scenarios.
5. The 3:30-4:30 time is not a typical study period included in the Grass Valley Model. Regardless, this period falls within PM peak hours (4-6 p.m.) so PM peak numbers must be utilized.

6. For all intersections that are expected to operate at an unacceptable LOS, the project shall either, pay their fair share contribution if the project is in the GVTIF, or shall construct the improvements and enter into a reimbursement agreement.
7. The City concurs with TJKM's Attachment 2: Traffic Mitigation Measures summary table and disagrees with nearly all responses that said intersections do not require mitigation. As noted, the majority of intersections are already failing under Cumulative conditions, thus the recommended mitigations listed will be required.
8. As it pertains to cumulative impacts, the study did not include approved projects that were approved by the City at the time the Notice of Preparation was routed, as required by the California Environmental Quality Act. Two specific projects, Loma Rica Specific Plan and Dorsey Marketplace need to be included in any cumulative analysis. Both of the traffic studies for those projects, conclude much different LOS impacts to multiple intersections (multiple cumulative D, E, and F intersections) than what is concluded in the mine project's cumulative impacts. This is a flaw in the study that needs to be resolved.
9. As it pertains to VMT methodology, the City has two concerns:
    a. Though heavy truck traffic is not included in the analysis and there is discussion as to why not, the City disagrees with not including this in the VMT. Heavy truck traffic is a key component to the project itself and without it the project cannot succeed. It is a critical and necessary part of the project and in a sense this is similar to a sand and gravel trucking operation, and therefore, cannot be discounted. If heavy truck traffic were not part of this project, the City would agree it does not need to be included.
    b. The City also disagrees with the VMT applied to employees. There are very limited housing opportunities within 20–30-mile radius of the mine site to accommodate the number of expected employees. The City strongly believes the 14.8 mile average is unrealistic based on current housing conditions in the region and the study needs to better explain the rationale for this number or provide a more reasonable and realistic assumption for employee VMT.
10. Sight distance calculations for new driveway shall be submitted for further review.

If you have any questions, please call me at 274-4711 or email at toml@cityofgrassvalley.com.

Sincerely,

Thomas Last
Community Development Director

CC: Tim Kiser, City Manager

CITY OF GRASS VALLEY
Community Development Department
Thomas Last, Community Development Director

125 East Main Street
Grass Valley, CA 95945

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530-274-4340
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August 5, 2020

Matt Kelley, Senior Planner via email
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

RE: NOP for the CUP and Reclamation Plan for the Rise Grass Valley mining project.

Dear Mr. Kelley:

Though the City is perplexed why the NOP has been released when the application is still incomplete, we offer the following comments in response to the NOP. Furthermore, since the application is incomplete and there is a possibility that the project description could change, the City reserves the right to provide additional comments on the scope of the EIR once the application is complete.

1. Since December 2019, the City has provided a consistent request on multiple occasions to the applicant that we expect them submit a conceptual application to the City so we can provide a formal response on the annexation/lead agency question. This approach is supported within the City/County Tax Share Agreement, the City/County MOU on joint land use planning in the sphere of influence, and by County General Plan Policy 1.8.4. To date, the applicant has been unwilling to follow the City's and County's process for review of projects within the City Sphere of Influence.
2. The EIR must address service impacts on the City fire and police services. Due to mutual aid agreements with respective agencies and because of the location of City facilities, this project will have a significant impact on both police and fire services. It is likely that some of the buildings will need to rely on the City's fire apparatus (ladder truck) and the project needs to ensure access to those structures.
3. The EIR must address noise and vibration issues caused by underground blasting and above ground activities that could impact existing high-tech companies in the Whispering Pines area.
4. The EIR must adequately address the treatment of stormwater runoff and mine dewatering that leaves the site and eventually travels into the City limits.
5. Since the project proposes to dewater the mine and place it into the South Fork of Wolf Creek, the EIR must address the flooding and storm drain system issues associated with the increase in water flows into this creek and on the City infrastructure. There are several areas in the City that already experience flooding issues and adding more water into this creek must be addressed.

6. The EIR must address the traffic impacts to City roads. There are multiple intersections and road segments that will be impacted. Additionally, the EIR must address site distance issues and other safety concerns with the proposed haul route.
7. The City's General Plan shows a connecting road between Bennett and Idaho-Maryland Roads. The EIR needs to address this issue re the planning and potential realignment of Centennial Road with Springhill Road.
8. The City has concerns with the proposed truck routes to the Centennial Industrial site and impacts on City roads. The City will require a tonnage fee or other mechanism to be placed on the project to ensure proper long-term maintenance. The transport of material 16 hours a day 7 days a week will conflict with City noise limits for typical construction projects. The residents along Brunswick road could be severely impacted by the constant noise of trucks.
9. The EIR needs to address the decrease in water flows into Wolf Creek from the shaft along Idaho-Maryland Road created by dewatering.

If you have any questions, please call me at 274-4711 or email at toml@cityofgrassvalley.com.

Sincerely,

Thomas Last
Community Development Director

CC: Tim Kiser, City Manager

CITY OF GRASS VALLEY
Community Development Department
Thomas Last, Community Development Director

125 East Main Street
Grass Valley, CA 95945

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December 20, 2019

Matt Kelley, Senior Planner via email
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

RE: Initial comments on CUP and Reclamation Plan for the Rise Grass Valley mining project.

Dear Mr. Kelley:

The following represents the City's preliminary comments and concerns on the above project. This is not to be considered an exhaustive review by the City. It also includes several recommendations I noted at the December 16, 2019, meeting at the County offices.

1. Though staff indicated the City is unlikely to be interested in annexation and processing of the application, the City is requesting the County and applicant follow past practice and have the applicant submit a conceptual application to the City so we can provide a formal response. As discussed at the meeting, staff would then submit this to the City Council to get its direction on processing the application due to the magnitude and complexity of this project.
2. If it is not processed in the City, the City requests the County and City enter into a Memorandum of Understanding (MOU). Since this project has the potential to create several significant impacts on the City, the purpose of the MOU would be to set up procedures that ensure impacts of the project on the City will be fully incorporated into the project. Some of the items raised at the meeting included impacts on: a) fire and police services; b) noise and vibration issues on existing high-tech companies in the Whispering Pines area; c) water treatment; impacts to City roads; d) the City's General Plan's that shows a connecting road between Bennett and Idaho-Maryland Roads - planning for and setting aside land for a realignment of Centennial Road with Springhill Road; e) storm water requirements (City system capacity, treatment standards, etc.) that meet City standards since the water will flow into the City.
3. I discussed the need for the applicant to pay the City to obtain assistance with its review of the project. The City understands the concern with duplicating consultants with the City and County, but we do not have staff resources to provide proper attention and review of the project.
4. As discussed at the meeting, the City hired a mining consultant, geochemist, and other specialized consultants beyond the EIR consultant when it processed the proposed Idaho-Maryland Mine project in 2005.

5. It is likely that some of the buildings will need to rely on the City's fire apparatus (ladder truck) and the project needs to ensure access to those structures.
6. The City has concerns with the proposed truck routes to the Centennial Industrial site and impacts on City roads. The City will require a tonnage fee to be placed on the project to ensure proper long-term maintenance. The transport of material 16 hours a day 7 days a week will conflict with City noise limits for typical construction projects. The residents along Brunswick road could be severely impacted by the constant noise of trucks.
7. As the design of the proposed fill site moves forward, the City would request the applicant work with the City on setting aside land for the Wolf Creek Trail for the property along Idaho-Maryland Road in addition to designing the fill to accommodate a realigned road noted above.
8. Since the applicant proposes to dewater the mine and place it into the South Fork of Wolf Creek, the EIR must address the flooding and storm drain system issues associated with the increase in water flows into this creek. There are several areas in town that already experience flooding issues and adding more water into this creek must be addressed.
9. Need to address the decrease in water flows into Wolf Creek from the shaft along Idaho-Maryland Road created by dewatering.
10. Also, the City has a Master Environmental Assessment, Draft EIR and multiple technical studies from the 2005 mine project we can share with the County. Though this project proposes the operations occurring on the New Brunswick site, our records can provide some insight on the issues and community concerns.

If you have any questions, please call me at 274-4711 or email at toml@cityofgrassvalley.com.

Sincerely,

Thomas Last
Community Development Director

CC: Tim Kiser, City Manager

CITY OF GRASS VALLEY COMMENTS ON
THE IDAHO-MARYLAND MINE PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
(DECEMBER 2021) (SCH# 2020070378)
NEVADA COUNTY, CALIFORNIA

ATTACHMENT B:

TECHNICAL REVIEW TEAM RESUMES



Jeffrey G. Harvey, Ph.D.
Principal & Senior Scientist
Harvey Consulting Group
(916) 799-6065 (direct)
Harvey-Jeff@sbcglobal.net

Summary of Qualifications

Harvey Consulting Group provides environmental compliance and project development support services to clients throughout California for water resources, energy/transmission, mining and reclamation, and land development projects. Our primary services include project management and planning, public involvement, environmental impact assessment, policy development, and regulatory permitting. We are dedicated to providing outstanding client service, and technical and management expertise for complex and controversial projects.

The firm's principal, Dr. Jeffrey G. Harvey, has worked as an environmental consultant in California for more than 30 years. He has expertise in requirements of the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and related laws and regulations pertaining to water supply, water quality, land use planning, air quality, biological resources, cultural and historic resources, and natural resources conservation and management. He has organized and managed more than 300 projects, leading multi-disciplinary teams of scientists, engineers, lawyers, economists, and planners. Projects have included environmental assessments and permitting for water and energy development, mining, policy analysis of water resources and energy systems management, public infrastructure projects, industrial development and mining. As Senior Project Manager, he is responsible for client liaison, team coordination and task assignments, and for keeping projects on schedule and within budget. He also performs primary quality assurance / quality control functions for the team.

He has worked on western water, energy and related natural resources policy issues for most of his career, including water development, management, and planning, and analyses of land and agricultural water use practices and conservation, and power plant and hydroelectric power development. He worked on the San Joaquin Valley Drainage Program conducting resource management and policy studies of irrigated agriculture for the purpose of reducing toxic levels of selenium in drainage water, and to improve water use efficiency and water supply through improved on-farm water management.

Special emphasis has been placed on client representation, active coordination with agency staff and government decision-makers, and effective presentations and public testimony. In managing planning and document preparation, Dr. Harvey has streamlined the reporting and regulatory process through

development of detailed project objectives and focused identification of issues; effective consultation and liaison with regulatory agency staff and the applicant's representatives; and preparation of concise, organized, and readable reports. He has developed cost-effective mitigation strategies to resolve regulatory issues without impairing project goals and has prepared long term monitoring criteria to measure successful project implementation.

Education

Ph.D. in Geography
University of California, Los Angeles. Environmental Law and Policy, Hydrology and Water Resources, Natural Resources Management, and Impact Assessment.

M.A. in Geography
California State University, Chico. Environmental Planning, Water Resources Development, and Impact Analysis.

B.A. in Geography
California State University, Chico. Physical Geography; minor concentrations in Anthropology and Geology.

Professional Experience

2005 to present: *Harvey Consulting Group (HCG)*
Principal and Senior Scientist, private consulting practice providing professional services to local, state, and federal agencies, and private developers for water, power, mining and industrial land development projects.

1994 to 2005: *Greystone Environmental Consultants*
California General Manager, responsible for management of California offices in Sacramento and San Diego (for a company headquartered in Denver, Colorado); administrative and personnel management, business development, project management, client and public agency liaison.

1985 to 1994: *Research Associates*
Principal and Project Manager, private consulting practice providing professional services to local, state, and federal agencies, nonprofit environmental groups, and private developers.



Representative Mining Projects

The projects listed below include project management, regulatory permitting and environmental assessment spanning more than 30 years. References available for all projects within the past 10 years.

City of Grass Valley, Idaho-Maryland Mine Project DEIR

Project Manager as a subconsultant to ESA Associates for preparation of the Draft EIR for the proposed Idaho-Maryland Mine project. This multi-stage environmental review process included extensive community involvement and scoping. The proposal included reopening the historic Idaho-Maryland Mine to develop industrial and precious mineral deposits into gold and stone ceramic products. The project comprised three properties that encompassed a total of 138-acres of land. Project actions included dewatering and rehabilitating the historic Idaho-Maryland Mine workings, conducting underground resource exploration and development, developing the industrial mineral and gold ore deposits, processing mineral deposits to produce gold and manufactured stone and ceramic building products, operation and maintenance of these facilities, and performing reclamation activities at the project sites at the conclusion of the project. Primary responsibilities included scoping, public involvement and agency coordination, technical analyses of geology, hydrogeology, and geochemistry, and QA/QC of draft document sections. Project applicant withdrew their application and the project concluded at the Draft EIR stage.

Olive Pit Mining & Reclamation Operations and Long-Term Reuse Project

Environmental Impact Report to assess the extraction of all economically recoverable mineral resources from the 190-acre Olive Pit, and reclamation of the eastern 32 acres by filling to street level for future urban development. In partnership with the City of Irwindale, United Rock Products ("United Rock" or "Applicant") will resume mining operations at the Olive Pit and will reclaim the site concurrent with mining. The Proposed Project is expected to yield a minimum of 32-million tons of recoverable aggregate reserves that meet the quality standards of applicable California governmental agencies. Average production is anticipated to be 1 million tons of aggregate per year beginning in 2015. Mining will occur for a period of approximately 32 years with concurrent filling operations for reclamation commencing in the first of two phases. The remainder of the property will be reclaimed for the potential end land use of storm water retention and groundwater recharge, and/or flood control facility, and/or open space recreational land uses. Mining activities will utilize both dry and wet mining operations; and are subject to the City's guidelines for slope stability and public safety. Key issues involved traffic, noise, land use conflicts, air quality and biological resources.

United Rock Products Quarry and Reclamation Plan EIR

Senior Project Manager for preparation of an EIR for a quarry expansion project that involved 3 quarry locations, reclamation activities and post - reclamation land development projects. Key issues for the project included air quality related emissions of fugitive dust, geotechnical and slope concerns, groundwater exposure and contamination and underwater dredge activities. The impact analysis focused on current and future activities to the approximate horizon year of 2100 due to the protracted rate of



quarry reclamation activities. This was a fast-track project completed in five months after another consulting firm had failed to perform, leaving the City in a schedule bind and facing litigation. The EIR was successfully completed on the accelerated schedule, and litigation was avoided.

Vulcan Materials Company Mining and Reclamation Plan EIR
Project Manager for preparation of an EIR for a quarry expansion and reclamation project that included deepening and extending the life of two (2) aggregate quarries along with concurrent reclamation. The EIR included environmental review and analysis of an existing Class "U" Inert Debris Engineered Fill landfill; for both current operations and reclamation activities. The EIR assessed a programmatic evaluation of post-reclamation land uses for all three (3) project sites (Durbin Quarry, Reliance I Quarry, and Reliance II Landfill). Key issues for the project included fugitive dust, geotechnical and slope stability, groundwater exposure, contamination and underwater dredge activities, traffic, circulation, and roadway impacts, and post-reclamation land use planning.

Vulcan Materials Co. Mining & Reclamation Plan EIR Addenda 1, 2 &3
Project Manager for CEQA and SMARA compliance. These addendum documents to the Vulcan Materials Company Mining & Reclamation FEIR were prepared individually over a period of three years to evaluate proposed minor modifications to the Conditional Use Permit. Evaluations included the requested to modify conditions of approval at the Durbin and Reliance I Quarry sites, changing the hours of operation from 24 hours per day six days per week to 24 hours per day seven days per week, and to include the entire Reliance mine site under one reclamation plan with one State mine identification number (this mine is divided by the municipal boundaries of the cities of Irwindale and Azusa). Key issues included air quality, noise, and traffic/circulation. In each case, the proposed actions were concluded to be within the scope of the Vulcan FEIR and fulfilled the CEQA review necessary for an Addendum to an EIR.

Nu-Way Live Oak Inert Landfill Mitigated Negative Declaration
Project Manager for the preparation of an Initial Study and Mitigated Negative Declaration (MND) to allow for the closure and final reclamation of the Nu-Way Live Oak Inert Landfill. The Live Oak landfill is currently being reclaimed with inert material and was formerly operated as an aggregate quarry. A previously certified EIR for this landfill indicated that landfill reclamation would continue until street grade level was achieved. The operator of the landfill submitted a request to the City of Irwindale to allow for final reclamation, grading and closure to occur now which will result in site reclamation occurring to a level below that previously expected. The focus of the CEQA MND was to evaluate the difference in the revised project description and the resultant net environmental effect of ceasing landfilling operations early and not achieving site consistency with the surrounding street grade level. Key issues for this project were hydrology and drainage, geology and soils, water quality, and air quality.



Mining Impact and Reclamation Study
Impact Analysis, Environmental Planning and Policy Development. Project Manager for comprehensive analyses of mining activities within jurisdiction of the City of Irwindale, including evaluation of environmental and economic conditions, and options for reclamation and long-term economic development. A comprehensive two-volume report was prepared including analysis of existing mining operations for compliance with the state Surface Mining and Reclamation Act (SMARA), physical and environmental effects of mining within the City, and development of reclamation policies to guide long-term land use planning and economic development. The study covered 14 open-pit mines ranging from 80 to 500 acres in surface area, and minimum 100-feet to more than 200-feet deep. Of the 14 total sites, seven are active mines, four are implementing landfill reclamation, and three are inactive mines. Follow-up tasks have involved support in proceedings with the State Mining and Geology Board, assistance in development and promotion of legislative proposals to amend SMARA, technical review of reclamation plans and related environmental documents, and development of a revised financial assurances program for the City.

Mining Assessment for the City of Azusa
Senior Project Manager for a project involving an assessment of the existing Vulcan Materials mining operations to assist the City of Azusa in determining the nature and extent of existing minerals resource extraction entitlements under CEQA and SMARA and to identify required additional entitlements necessary to allow for an expansion of operations to include an 80-acre parcel contiguous to the existing 270-acre mine. Analyses included a market assessment of existing materials mined by Vulcan, a geologic assessment to determine future resource extraction value potential for the proposed new 80-acre mine and future reclamation options and an analysis of current measurement and reporting methodologies. Developed an implementation strategy to improve reclamation planning and identify opportunities and actions for ensuring Vulcan complies with all applicable City plans, policies and ordinances, SMARA and CEQA requirements.

Yuba County, Hallwood Aggregate Mine
Project Manager for preparation of a *Surface Mining Reclamation Plan* for an aggregate mine operating in former gold mine dredger tailings within the Yuba River corridor in Yuba County. Analyses also included impact assessment of the current aggregate mining and processing operations, hot plant and off-site transportation. The reclamation included multiple phases in sequence with planned mine expansion activities designed to be implemented concurrent with ongoing mining.



RCH GROUP
planning & environmental consulting

Paul Miller

Managing Principal, Environmental Services

Paul is an environmental professional with more than 35 years of experience in providing services and products to government agencies and private sector corporations. His technical areas of expertise include CEQA project management and technical analyses in the areas of air quality, greenhouse gas emissions, noise, integrated waste management, energy, and hazardous materials. With a broad range of environmental skills, he has applied his background since 1986 to CEQA and NEPA and has been integral in the preparation of over 500 CEQA/NEPA environmental documents, including project manager for more than 20 major EIRs. He has been the project manager or a key team leader for five state agencies (California Public Utilities Commission (CPUC), California Energy Commission (CEC), CalRecycle, the former California Integrated Waste Management Board, and the State Water Resources Board, Central Valley Region) on projects of statewide importance. He was the senior air quality and noise reviewer for CEQA documents at ESA for almost 20 years. Since the 1989 Paul has been involved in dozens of projects that that analyze the high-volume trucking of materials to or from industrial sites (landfills, composting facilities, and mines).

CEQA/NEPA Project Experience:

- **Quarrying/Mining CEQA/NEPA documents:** Idaho-Maryland Mine EIR 2007-2008 (City of Grass Valley), Olive Pit Mine EIR and Kincaid Pit IS/MND (City of Irwindale), Permanente Quarry Reclamation Plan Amendment EIR (Santa Clara County), R&J Aggregate Mine EIR and La Vista Quarry (Alameda County), Roblar Road Quarry EIR and Canyon Rock Quarry Expansion EIR (Sonoma County), San Rafael Rock Quarry EIR and San Rafael Rock Quarry Extension Application Supplemental EIR (Marin County), Vernalis Quarry EIR (San Joaquin County).
- **Project Manager and Senior Air Quality Reviewer of Energy Projects for California Public Utilities Commission (CPUC) CEQA documents:** Pacific Gas and Electric Co. (PG&E) Divestiture EIR for Hydroelectric System Divestiture EIR; PG&E Divestiture EIRs to sell Morrow Bay, Moss Landing, Oakland, Potrero, Pittsburg, and Contra Costa Power Plants; San Diego Gas and Electric Company's (SDG&E's) Power Plant Divestiture Mitigated Negative Declaration; Mitigated Negative Dec (MND) to divest Southern California Edison Company's power plants.
- **Landfill CEQA documents:** Yolo County Central Landfill Permit Revisions EIRs (2007 and 2021) , Forward Landfill Expansion EIR, Austin Road Landfill Expansion EIR; Altamont Landfill and Resource Recovery Facility Expansion EIR; Time Extension of Importation of Contra Costa County Waste to the Altamont Landfill EIR; Altamont Landfill Reclassification (Class II) EIR; West Contra Costa Landfill Closure CEQA Technical Assistance; Ostrom Road Landfill Permit Modifications (Class II) EIR; Eureka County Nevada Solid Waste Management NEPA EAs; Bakersfield City Sanitary Landfill; Closure/Post-Closure Maintenance Plans EIR; San Leandro Landfill Gas Collection and Flaring System Mitigated Negative Declaration; New Jamestown Landfill EIR; Sutter County Ash Disposal Site EIR; Ukiah Landfill Permit Revision Supplemental EIR; Ukiah Landfill Closure EIR (2020), Marsh Canyon Landfill EIR.
- **Senior Air Quality and Greenhouse Gas Reviewer:** Honda Port of Entry EIR (Port of Richmond), Union Pacific Railroad Modernization EIR (Lathrop, CA), Eagle Mountain Pumped Storage Hydroelectric EIR and EIS (Mohave Desert), Oasis Shopping Center Master EIR (Redding, CA), San

Rafael Rock Quarry EIRs, La Vista Quarry EIR (Alameda County), Novato Sanitary District Master Plan EIR, SAFCA Mayhew Levee Replacement Project Peer Review.

- **Senior Noise Analyst and Reviewer**: Mr. Miller has been collecting high-quality noise measurements since 1988. He specializes in collecting baseline environmental noise data and analyzing the potential noise impacts of proposed projects in CEQA and NEPA documents. RCH uses a noise data collection and processing system that he has been continually modifying and enhancing the processes for data accuracy and cost efficiency. The combined hardware/software system uses higher-capacity batteries, portable computers to download data, and customized software to automatically plot daily noise data showing relevant standards and noise monitoring locations.
- **Anaerobic Digestion CEQA documents:** CalRecycle (formerly the California Integrated Waste Management Board), Statewide Program EIR for Anaerobic Digestion Facilities; Central Valley Regional Water Quality Control Board (Central Valley Water Board) - Dairy Manure Digester and Manure Co-digester Program EIR; Blue Line Materials Recovery Facility (MRF), Transfer Station Anaerobic Digester with Compressed Natural Gas (CNG) Production MND, and Hitachi Zosen Inova Anaerobic Digester (San Luis Obispo County, public meeting EIR air quality presentations).
- **Material Recovery Facility CEQA documents:** Irwindale Material Recovery Facility EIR, South San Francisco Scavenger Company Materials Recovery Facility EIR; West Contra Costa County Integrated Resource Recovery Facility EIR; Sanitary Fill Solid Waste Transfer Station and Household Hazardous Waste Facility EIR; Yuba-Sutter Disposal Inc. Transfer Station and Compost MND; Stockton Scavenger Transfer Station Focused EIR; City of Fremont Transfer Station/MRF/Composting Facility EIR.

Education
1977 Master of Science (Zoology and Entomology)
Colorado State University – Fort Collins, Colorado
1974 BA Zoology, Miami University – Oxford, Ohio

Professional Certifications and Affiliations
- California Air Resources Board -Accredited GHG Verifier of Emissions Data Reports for Mandatory Reporting
- Member, Association of Environmental Professionals (AEP)
- Board Member since 2010, Air and Waste Management Association, Mother Lode Chapter of Golden West Section

25+ Years Consulting Experience
- Environmental Science Associates (ESA)
- North State Resources
- Aspen Environmental Group
- EarthMetrics, Inc.
- Environmental Measurements, Inc.
- Ecology Consultants, Inc.
- Miller Environmental Consultants

RCH GROUP
planning & environmental consulting

Dan Jones

Senior Associate /Air Quality & Noise Analyst

Dan Jones is an environmental professional with over eight years of experience in providing environmental services and products to government agencies and private sector corporations. Dan's technical areas of expertise include CEQA project management and document preparation and technical analyses in the areas of air quality, greenhouse gases/climate change, energy, and noise. Dan has been integral in the preparation of over 300 CEQA documents and technical studies supporting such documents. Dan's technical noise experience includes short-term and long-term noise monitoring and noise modeling with the Federal Highway Administration's Roadway Construction Noise Model and Highway Traffic Noise Prediction Model. Dan is proficient in a variety of air emissions models including California Air Pollution Control Officers Association's CalEEMod, California Air Resource Board's EMFAC and OFFROAD, and Sacramento Metropolitan Air Quality Management District's Road Construction Emissions Model.

CEQA/NEPA Project Experience:

- **Mining Projects:** Olive Pit Mine and Reclamation Project EIR, R&J Aggregate Mines EIR, Olive Pit Mine and Reclamation Project EIR Addendum, and Irwindale Kincaid Pit Remediation and Reclamation Project, San Rafael Rock Quarry Extension Application Supplemental EIR, and Salton Sea Lithium Project EIR.

- **Water Conveyance/Infrastructure Projects:** East Bay Municipal Utility District (EBMUD) Sobrante Water Treatment Plant EIR, Buena Outfall Force Main Phase III IS/MND, Oasis Irrigation System Expansion Project EIR, Carmel River Floodplain Restoration and Environmental Enhancement (CRFREE) Mitigation Pipeline Underground Project IS/MND, The People's Moss Landing Water Desalination Project EIR, Central Amador Water Project Pioneer Water Rehabilitation Project IS/MND, Cuesta Heights Water Storage and Distribution Improvements Project IS/MND, Alameda Creek Levee Improvement IS/MND, Christian Valley Park Community Service District Water Storage Tank Project IS/MND, Modesto RD 2091 Levee Air Quality Analysis, Santa Venetia Timber Reinforced Berm Improvement Project, and San Joaquin Mormon Slough Levee Air Quality Analysis.

- **Waste Management Projects:** Glenn County Solid Waste Conversion Facility EIR, Blue Line Biogenic CNG Facility CEQA Addendum, Recology Vallejo Permit Revisions IS/MND, Valley Springs Recycling Center IS/MND, Irwindale Materials Recovery Facility/Transfer Station EIR, Sierra Waste Transfer Station Permitting, Forward Landfill SEIR, North Richmond Chip & Grind GHG Analysis, San Luis Obispo Anaerobic Digester IS/MND, Fair Deal Recycling Facility IS/MND & Transfer Processing Report, Ukiah Landfill Closure EIR, San Luis Obispo Anaerobic Digester Odor Impact Minimization Plan, Irwindale Materials Recovery Facility/Transfer Station EIR Addendum, San Luis Obispo Anaerobic Digester Authority to Construct Permit, Stage Gulch Organics Compost Facility EIR, and Yolo County Central Landfill (YCCL) Permit Revisions EIR.

- **Energy Projects:** Castor Solar Noise Study, California Public Utilities Commission Fulton-Fitch Mountain Reconductoring Project, California Public Utilities Commission Central Valley Power Connect 230 kV Project, California Public Utilities Commission Riverside Transmission Reliability Project, San Diego Gas & Electric TL 695, TL 6971 Reconductoring Project and Santa Paula Battery Energy Storage System IS/MND, PG&E Wheeler Ridge Junction Project, Gemini Solar EIS, Burney Bioenergy Facility Air Quality Analysis, and Salton Sea Geothermal Project.

- **Restoration/Recreational Projects:** Rockville Trails IS/MND, High Plains Shooting Sports Center Noise Analysis, Putah Creek Restoration Projects Program EIR, Lower Putah Creek Restoration Project IS/MND, Lake Chabot Campus Modernization IS/MND, Phillips 66 Company Line 200 Release Remediation Project IS/MND, Bay Point Restoration and Public Access IS/MND, University of California Santa Barbara Sea Wall IS/MND, Black Diamond Mines Preserve EIR, North Bay Wetland Mitigation Bank Air Quality and GHG analysis.

- **Residential/Commercial/Industrial Development Projects:** Alameda County Monte Vista Memorial Gardens EIR, Marin County Alta Way IS/MND, San Marin High School Turf Field Categorical Exemption, San Marin High School Expansion IS/MND, Novato High School Expansion IS/MND, Colfax Maidu Village Commercial Center IS/MND, City of Sacramento Fruitridge Shopping Center Redevelopment IS/MND, City of Sacramento River Oaks (The Cove) EIR Addendum, Colfax Corporation Yard and RV/Boat Storage IS/MND, Colfax Auburn Street Hotel IS/MND, Colfax Sierra Oaks Estates Residential Development IS/MND, Shasta 10 Noise/AQ/CAP Consistency Analysis, Morgan Knolls Subdivision IS/MND, Rocklin Meadows Subdivision AQ/GHG Analysis, Wildcat Subdivision AQ/GHG Analysis, Winding Creek Subdivision Noise Analysis, Rancho Vista Subdivision AQ Analysis, Riolo Vineyards Specific Plan IS/MND, Nevin Avenue Apartments IS/MND, Calistoga Subdivision Noise/AQ/CAP Consistency Analysis, Residences at Railway AQ/GHG Analysis, Centennial Towers North Tower AQ/GHG/HRA Analysis, 488 Linden Avenue AQ/HRA Analysis, 255 Cypress Avenue AQ/HRA Analysis, Centennial Towers R&D Project AQ/GHG/HRA Analysis, Whitehawk I & Whitehawk II AQ/GHG Analysis, Viri Estates Skilled Nursing Facility IS/MND, Alviso Village AQ/GHG/HRA Analysis, Lakeside Fire Protection District IS/MND, Green Island Road Wine Warehouse AQ/GHG/HRA Analysis, Pruneyard Shopping Center AQ/GHG/HRA Analysis, Richmond Terminal 3 Timber Export Facility IS/MND, 901 Larch Avenue IS/MND, 52 Franklin Avenue IS/MND, UCSF Research Building and Parking Garage Expansion EIR, 150 Airport Blvd IS/MND, Oak Knoll Mixed Use Community Plan EIR, Lincoln Northeast Quad Specific Plan HRA, Oakland T12 Office Tower, Sonora Food Service Building IS/MND, Osgood Heights IS/MND, 550 Gateway Blvd Hotel IS/MND, Justin Vineyards & Winery Permit Application, Sunnyvale Atria on El Camino Real AQ/GHG/HRA Analysis, Quarry Place Mixed Use Development AQ/GHG/Noise Analysis, First and Campbell AQ Analysis, Roseville Junction Crossing Noise Analysis, William Jenkins Health Center Noise Analysis, John Henry High School AQ/Noise Peer Review, Sierra Oaks Estates and Village Oaks IS/MND, The Parkway Apartments IS/MND, Cal Expo Rock & Brews CEQA Categorical Exemption, Solana Beach Skyline Elementary School Reconstruction Peer Review, Folsom Bidwell Pointe CEQA Infill Exemption, Granite Bay Joe Rodgers Subdivision AQ/GHG/Noise Analysis, Monarch Vista Apartments IS/MND, Double S Ranch Subdivision AQ/GHG Analysis, Vista Self Storage IS/ND, Novato High School Turf Field Categorical Exemption, Colfax Sierra Oaks Estates and Village Oaks CEQA Addendum, Bayview Health Risk Assessment, The Oaks Assisted Living CEQA Addendum, Dutton Meadows CEQA Addendum, Rocklin Tractor Supply Company AQ/GHG Analysis, Yolo County Haykingdom Expansion IS/MND, and Yolo County Cold Storage IS/MND.

Education
BS, Environmental Policy Analysis and Planning, University of California, Davis, CA

Professional Affiliations
Member, Association of Environmental Professionals

JOHN KAIN, AICP
PRINCIPAL, URBAN CROSSROADS, INC.
jkain@urbanxroads.com

BACKGROUND

Founding partner John Kain is a transportation planner who is particularly skilled at the integration of traffic projections with meaningful designs that improve elements of the built environment and expand our mobility choices. Mr. Kain's 40 years of professional experience stretches through the spectrum of transportation domains. These include plans for new communities, City General Plan mobility/circulation elements, traffic impact analyses, regional and local funding programs, transit station area designs, accommodations for pedestrians and bicyclists, shared parking studies, roundabout scaled concept plans, and implementation of "complete streets" strategies. Mr. Kain is a Fellow in the Institute of Transportation Engineers.

EDUCATION

M.S. – Administration
(Transportation Systems Management)
University of California, Irvine • 1977

B.A. - Social Ecology
University of California, Irvine • 1975

PROFESSIONAL CERTIFICATIONS

AICP (American Institute of Certified Planners)
American Planning Association • 1983

Instructor Credential - Public Services & Administration
Cal. Comm. Colleges • 1981

Management of Transportation Programs
University of California, Irvine • 1981

AFFILIATIONS

ITE	Institute of Trans. Engineers
ULI	Urban Land Institute
LAI	Lambda Alpha International

SELECTED AWARDS

AEP Environmental Analysis Merit Award • 2018
(CV Link Multi-Modal Transportation Project)

PCBC Best On The Boards Site Plan • 2017
(Liberty Project, West Sacramento)

ULI Best of the Best - Vision Award • 2011
(WRCOG, 4-City NEV Plan)

APA Comprehensive Planning Award • 1999
(ETRPA, El Toro Base Reuse Plan)

SELECTED PROJECT EXPERIENCE

Great Park Neighborhoods / Heritage Fields
City of Irvine • Ongoing
Nakase Nursery – Mobility Study/Area Plan Network
City of Lake Forest • On-going
Pomona Gold Line Station Parking and Access
City of Pomona • On-going
2700 North Main Mixed Use – Traffic Impact Analysis
City of Santa Ana • 2017
Mission Gateway Plaza & Villas – Traffic Impact Analysis
City of Jurupa Valley • 2017
FivePoint Amphitheatre – Event Parking and Access
City of Irvine • 2017
CV Link Transportation Analysis
Coachella Valley • 2017
Life Time Fitness – Traffic and Parking Assessments
City of San Clemente • 2017
Liberty Project - Sustainable Mobility Plans
City of West Sacramento • 2016
Canyon Springs Healthcare Campus & Senior Living
City of Riverside • 2015
Arantine Hills – Impact Analysis/Roundabout Designs
City of Corona • 2015
Mesa Verde Estates – Circulation Phasing
City of Calimesa • 2015
Newport Beach General Plan Update Traffic Projections
City of Newport Beach • 2014
The Preserve at San Juan
Orange County • 2014
Athens Materials Recovery Facility & Transfer Station
City of Irwindale • 2014

URBAN CROSSROADS

MARLIE WHITEMAN, P.E.

SENIOR ASSOCIATE, URBAN CROSSROADS, INC.
mwhiteman@urbanxroads.com



BACKGROUND

Senior Associate Marlie Whiteman, P.E., is a transportation engineer with over 20 years of full time consulting experience in travel demand forecasting, traffic impact analysis, and mobility assessments. She is a recognized transportation modeling expert, with strengths in model data development, consistency, validation, preparation of future forecasts, post-processing, as well as circulation planning, parking evaluations and access studies. Ms. Whiteman's hands-on capabilities include the use of various modeling software packages, such as TransCAD, Cube, and Tranplan. She earned a Bachelor of Science degree in Civil Engineering from the University of California, Irvine.

EDUCATION

B.S. – Civil Engineering
University of California, Irvine • 1996

REGISTRATIONS

PE Registered Professional Traffic Engineer – TR 2186 • 2003

AFFILIATIONS

OCTEC Orange County Traffic Engineering Council

APA American Planning Association

ITE Institute of Transportation Engineers

SELECTED ACCOMPLISHMENTS

AEP Environmental Analysis Merit Award • 2018
(CV Link Multi-Modal Transportation Project)

APA National Planning Achievement Award and Orange County Award of Merit • 2008
(Newport Beach General Plan)

Student chapter treasurer, vice president, & president, in succession • 1992-1996
(American Society of Civil Engineers at UCI)

SELECTED PROJECT EXPERIENCE

Pomona Gold Line Station Parking and Access
City of Pomona • Ongoing
Great Park Neighborhoods Transportation Analyses
City of Irvine • On-going
CV Link Transportation Analysis
Coachella Valley • 2017
FivePoint Amphitheatre – Traffic/Parking Management
City of Irvine • 2017
Ocean Breeze Senior Community - Parking and Access
City of Huntington Beach • 2017
Travertine La Quinta Transportation Analysis
City of La Quinta • 2017
Jeronimo Road Office and Warehouse Sites
City of Irvine • 2016
Pepper Avenue Specific Plan TIA
City of Fontana • 2015
Athens-Irwindale MRF and Transfer Station TIA
City of Irwindale • 2015
Newport Beach Traffic Modeling Support
City of Newport Beach • On-going
Lake Elsinore General Plan Traffic Modeling
City of Lake Elsinore • On-going
Moreno Valley General Plan Traffic Modeling
City of Moreno Valley • 2014
Rancho Santa Margarita General Plan Traffic Modeling
City of Rancho Santa Margarita • 2014

URBAN CROSSROADS

AGENCY LETTER 8: THOMAS LAST, GRASS VALLEY COMMUNITY DEVELOPMETN DEPARTMENT

Response to Comment Agcy 8-1

This comment is introductory in nature and provides general concerns regarding the project and its associated EIR. The commenter's specific assertions are addressed in the responses below.

Response to Comment Agcy 8-2

Nevada County General Plan Policy 17.7 states:

> *Use permit time limits for each project shall be established on a case-by-case basis. Time limits shall be based on the reasonably expected life of the mining operation and potential conflicts with future neighboring land uses. Each project shall have a periodic review for compliance with the use permit by the Planning Agency. In no case shall such review time period exceed five years. Said review shall be funded by the applicant.*

In this case, the applicant's requested 80-year permit timeframe is based on the historic production and potential for extension of the underground mineral resources to depth and the high level of capital investment needed to make the mine operational.

Response to Comment Agcy 8-3

The commenter proposes a reduced scale version of the project, whereby the 1,000 tons per day goal is reduced to a cap of 500 tons per day or less and no nighttime hauling. It is unclear what the commenter considers as nighttime activities. For clarification, the DEIR notes that trucking of engineered fill to the Centennial Industrial Site and local construction markets via SR 49 is scheduled at 16 hours per day from 6AM to 10PM (e.g., DEIR Table 3-7 and page 6-14). With an average of 50 trucks per day this is approximately 3 trucks per hour, and with a maximum of 100 trucks per day, this is approximately 6 trucks per hour.

The commenter's recommendation for a reduced project was evaluated as an alternative in Chapter of the DEIR - Alternative 4, Reduced Throughput. Alternative 4 was found to meet most of the project's objectives but would not meet Objectives 1 and 7 due to the difficultly in financing a project of this scale with lower throughput and the reduced number of employees. Further, this alternative would not reduce any of the project's significant impacts below the threshold of significance, with the possible exception of some intersection traffic impacts.

Response to Comment Agcy 8-4

The hours of operations for various activities are shown in Table 3-7 of the DEIR. Offsite hauling of engineered fill (which would include transport and dumping of the load) would take place from 6:00 AM to 10:00 PM 7 days a week. Placement, grading, and compaction of engineered fill would take place from 7:00 AM-3:30 PM Monday-Friday. The offsite hauling activity does not include spreading and compacting; thus, no construction activity would take place prior to 7:00 AM.

Truck traffic on a public road is not a construction activity, so the use of trucks on the roadways prior to 7:00 AM does not violate the City or County noise ordinances. Moreover, neither the Centennial nor Brunswick site are within a 500-foot radius of a residential zone in the City of Grass Valley and therefore City of Grass Valley Ordinance 8.28.100 has no relevance to the project. Impacts from noise from use of trucks and dumping on the Centennial site during the proposed hours has been analyzed in Chapter 4.10 of the DEIR.

Response to Comment Agcy 8-5

The commenter states that the County may also consider splitting the Centennial Site operations off as a separate project and conducting independent environmental review and permitting. Comment noted.

Response to Comment Agcy 8-6

A Notice of Applicability (NOA) for the water discharge is required by Mitigation Measure 4.8-1(a). As stated in the mitigation measure the owner shall be required to submit quarterly monitoring reports to the Central Valley Regional Water Quality Control Board (CVRWQCB).

General Order R-5-2016-0076 has been replaced with General Order R-5-2022-006 and the relevant sections of Chapter 4.8, Hydrology and Water Quality of the DEIR have been revised for clarification purposes as shown in Response to Comment Agcy 5-11. Upon receipt of the complete Notice of Intent (NOI), if the discharge is deemed eligible for coverage under the General Order, the CVRWQB will issue a Notice of Applicability (NOA). The NOA will specify monitoring and reporting program requirements. All NPDES permits are required to specify requirements for recording and reporting monitoring results. General monitoring provisions of the General Order require that samples taken for the purpose of monitoring be representative of the monitored activity. The monitoring and reporting schedule will be based on the requirements of General Order R-5-2022-006, under the jurisdiction of the CVRWQB. If the CVRWQB believes that more frequent sampling or reporting is required, those requirements will be included in the NOA.

There are currently two other permitted discharges downstream of the project under the same General Order. The Empire Mine State Park discharges to South Fork Wolf Creek and is required to sample for Iron, Manganese, and Arsenic a minimum of once per month. The North Star Water Treatment Facility is required to sample for Iron and Manganese a minimum of once per month and Arsenic a minimum of once per quarter.

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01/r5-2016-0076_noas/r5-2016-0076-005_amend.pdf

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01/r5-2016-0076_noas/r5-2016-0076-001_noa.pdf

Response to Comment Agcy 8-7

Underground vehicles will be electric powered only, as stated on page 4.3-50 of the DEIR. The inadvertent reference to “diesel” has been removed from page 3-19 of the DEIR, as follows:

> Mine development in nonmineralized “barren” rock (i.e., non-gold bearing) is expected to result in the production of approximately 500 tons per day (182,500 tons per year) of barren rock. The barren rock would be transported from the tunnel face to the mine shaft (using electric ~~or diesel-~~powered load/haul/dump vehicles, rail cars, and/or conveyors) to underground rock bins located adjacent to the shaft. The rock would then be loaded into the shaft skips, hoisted to the surface, and dropped into one of the compartments of the concrete silo located on the surface. The barren rock will then be transported by trucks on the surface for use as engineered fill.

The above minor change is for clarification purposes and does not affect the adequacy of the analysis contained in the DEIR, nor alter any conclusions.

Response to Comment Agcy 8-8

As described in Section 3.0 of the DEIR, after full placement of fill at the Centennial and Brunswick Industrial sites to the pad design elevations, hauling of engineered fill (barren rock and sand

tailings) would shift entirely to be utilized in local and regional construction markets. Please also see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Agcy 8-9

As stated, page 3-40 of the DEIR, back-up power generation would have a capacity to provide approximately 6 MW on a continuous basis and the net load for the operation is approximately 6MW. Therefore, the backup generators have the capacity to power the entire operation if utility power is interrupted. Engineering details, including electrical designs and alarms, would be provided in the submittal of Improvement Plans to Nevada County which require approval before commencement of construction.

Response to Comment Agcy 8-10

The word "stored" is not used on page 3-26 of the DEIR. Engineered Fill would be placed on approximately 31 acres of the Brunswick Industrial site as described in Chapter 4.7 of the DEIR, within the limits of area and height as shown in Figures 3-7 and 3-8 of the DEIR. These limits define the maximum volume of engineered fill that can be placed on the Brunswick site. Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets regarding demand for barren rock or sand tailings. Note that no stockpiles of engineered fill would be kept on the Brunswick site, as all material to be sold in local and regional construction aggregate markets would be kept either underground, or in surface bins at the Brunswick shaft and the storage bay in the process plant.

Response to Comment Agcy 8-11

Insurance coverage and applicable limits are not environmental impacts that require analysis under CEQA. Explosives transporters would be required to comply with all applicable laws regarding transport of explosives including any statutory or regulatory insurance policy requirements.

Response to Comment Agcy 8-12

Prior to commencement of initial mine dewatering, the Project Applicant will connect 30 properties in the East Bennett area to the NID potable water system as required in Mitigation Measure 4.8-2(c) of the DEIR.

Response to Comment Agcy 8-13

The mine rescue team will be comprised of on-site employees of the project.

Response to Comment Agcy 8-14

This comment does not relate to an environmental impact nor a deficiency with the DEIR. Comment noted.

Response to Comment Agcy 8-15

The commenter suggest that the various permits shown under the authority of the State Water Resources Control Board Division of Water Rights should be shown as being under the jurisdiction of the Regional Water Quality Control Board (RWQCB). Table 3-11 of the DEIR is hereby revised to show that the specific permits are under the authority of the RWQCB. Comment noted.

State Water Resources Control Board ~~Division of Water Rights~~	401 (Water Quality) Certification (Clean Water Act, 33 USC 1251: if the project requires Army Corps of Engineers 404 permit)	Discharge into "water of the United States" including wetlands

	General Industrial Activity Stormwater Permit. Notice of Intent (40 CFR Part 122)	Stormwater discharges associated with industrial activity, unless covered by individual NPDES Permit
	Spill Prevention Control and Countermeasures Plan (Health and Safety Code 25270 et seq.; 40 CFR Part 122)	Underground storage of petroleum of 42,000+ gallons. Above ground storage with 10,000+ gallons; or any spill affecting surface waters, single tank of 600 gallons, or 1,320 total

The above minor change is for clarification purposes and does not affect the adequacy of the analysis contained in the DEIR, nor alter any conclusions.

Response to Comment Agcy 8-16

The commenter requests that the DEIR include maps showing the maximally exposed sensitive receptor related to the health risk assessment. Please see Dudek Memorandum HRA Isopleths – Exhibit D, included in the Final EIR as Appendix K.

Response to Comment Agcy 8-17

The project design incorporates the extensive use of electric machinery and vehicles and therefore decreases the reliance on fossil fuels to the extent possible. All underground mining and surface processing would be powered by electricity provided by the local utility PG&E. Mitigation Measure 4-3-1(b) requires that where access to alternative-fueled equipment is available, portable diesel engines will be prohibited. As discussed in Section 4.3-4 of the DEIR, the use of fossil fuels has been minimized and use of grid-supplied electricity provides an opportunity for the use of renewably-generated electricity to power project operations. Thus, use of electrically-powered equipment would reduce the project's dependence on fossil-fuel energy supplies and would not be considered an inefficient source of energy demand. The quantity of fuel used, including gasoline and diesel, for operations was considered to generate the emission estimates provided in Appendix E.1 using the emission factors and vehicle assumptions provided in that report. Additionally, a memorandum from Dudek, explaining the expected volumes of gasoline and diesel to be used by the project has been attached to the Final EIR as Appendix M. As further detailed in revisions to the discussion for Impact 4.3-4, the volume of gas, diesel and other energy used by the project is not considered wasteful, inefficient or unnecessary.

4.3-4 Result in the inefficient or wasteful use of energy. Based on the analysis below, the impact is *less than significant*.

Implementation of the proposed project would result in the consumption of energy resources during construction, operation, and reclamation activities. The principal forms of energy consumed would be electricity, gasoline, and diesel. The foregoing forms of energy would be consumed by off-road equipment, facilities, stationary generators, and on-road vehicles. Off-road equipment (such as graders, excavators, cranes, et.) and stationary generators would generally be powered by diesel; however, some equipment, such as boring machines, air compressors, locomotives, pumps, and ventilation equipment would be electrically powered. On-road vehicles would demand either diesel or gasoline, with lighter duty vehicles often requiring gasoline while haul trucks and heavier duty vehicles typically require diesel fuel.

In addition to reducing air quality and GHG emissions, APM-AQ-1, Exhaust Emission Controls, would serve to avoid inefficient energy consumption in several ways. First, APM-AQ-1 commits the Project Applicant to using Tier 4 Final equipment throughout project construction, operation, and reclamation. The commitment to the use of Tier 4 engines is further required by Mitigation Measure 4.3-1(b) of this EIR. As a result of the improvements integrated into Tier 4 Final engines (relative to lower tier engines), Tier 4 Final compliant engines are generally the most fuel-efficient models currently available. Consequently, by using Tier 4 compliant engines throughout the construction, operation, and reclamation processes, fuel use by off-road equipment would be minimized, and the off-road equipment used in project implementation would not be inefficient.

As a further means of increasing the efficiency of fuel use associated with project implementation, APM-AQ-1 includes measures to minimize vehicle idling where practical. In general, reducing idling reduces the amount of run-time for engines, which decreases the amount of fuel consumed. Reducing idling time would, therefore, avoid inefficient energy consumption related to off-road vehicle use. Similarly, maintaining equipment in accordance with manufacturer's specifications, as required by APM-AQ-1, ensures that equipment continues to operate efficiently.

Projected fuel use during construction is approximately 161,700 gallons of diesel and 21,488 gallons of gasoline. Projected petroleum use during operation of the project averages to 222,375 gallons per year (165,182 gal/year (diesel) + 57,192 gal/year (gasoline)) over the estimated 11-year period during which engineered fill would be transported by truck to the Centennial and Brunswick Industrial Sites. For the remainder of the life of the project, during which engineered fill is transported longer distances to market, projected annual petroleum use is 403,208 gallons (357,742 gal/year (diesel) + 45,468 gal/year (gasoline)).

In addition to the energy efficiency requirements focused on reducing fuel consumption discussed above, construction and operations would also require operation of electrically powered equipment. Total energy demand during construction is estimated at 16,513 megawatt-hours. Total annual energy demand (PG&E supplied) for the operational lifetime of the project is estimated at 49,613 megawatt-hours. Use of grid-supplied electricity provides an opportunity for the use of renewably generated electricity to power project operations. Unlike fossil-fueled equipment, electric equipment may receive electrical power from sources such as solar, hydro-electric, wind, or biomass, which are sustainable and renewable. The electricity provider for the project area, PG&E, currently utilizes a variety of renewable energy sources to provide electricity to the grid. Thus, use of electrically powered equipment would reduce the project's dependence on fossil-fuel energy supplies and would not be considered an inefficient source of energy demand. Although electricity demand for the project would primarily be met through grid-supplied electricity, in certain instances, such as during power outages or emergency electrical shut-offs, the use of emergency generators would be necessary to provide continued electrical power. Despite the emergency generators being diesel fueled, both of the generators used during project construction and all four of the generators used during project operations, if needed, would be Tier 4 Final engines. As discussed above, Tier 4 Final engines are the most efficient engines currently available, which would ensure that the consumption of fuel by the generators would be minimized to the extent feasible. Moreover, the generators would be used to provide continued operations to critical mining

infrastructure such as pumps, locomotives, and ventilation systems, which are critical to the safety of miners and efficient operation of the mine. Thus, the use of electrically powered equipment would not result in the inefficient or wasteful consumption of energy.

All stages of project implementation would require on-road vehicle use. Light- and heavy-duty vehicles would be used by employees commuting to and from the project sites, as well as for the movement of goods, products, and equipment to and from the project sites. On-road vehicles currently use a variety of fuels including gasoline, diesel, and electricity. California has implemented strict regulations related to fuel efficiency standards for all types of vehicles, and to encourage the proliferation of electrically powered vehicles. Project-related vehicles, including those operated and owned by the Project Applicant, would be required to meet all existing and future state standards, which would ensure that all vehicles operated as part of the project are fuel- and energy-efficient. Finally, by using project-generated fill at the Centennial and Brunswick sites, the project would provide a local source of fill materials to both sites, which would minimize the length of travel for fill material. Providing local sources of fill materials reduces the energy required to transport material, and provides an energy-efficient supply of construction materials.

Based on the above, APM-AQ-1 and Mitigation Measure 4.3-1(b) would ensure that only high-efficiency off-road equipment is used during project construction, operation, and reclamation. Electrically powered equipment used on-site would primarily be served by grid-supplied electricity, which would originate from an increasingly renewably sourced mix of energy, and, if emergency power is required, the emergency generators would be Tier 4 Final compliant engines. On-road vehicles are required to meet stringent state and federal requirements related to fuel efficiency. All project vehicles would be required to comply with the existing requirements, which would ensure that on-road vehicles would be operated in an energy efficient manner. Accordingly, the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy, and the impact would be ***less than significant***.

Mitigation Measure(s)
None required.

The above revisions to the DEIR provide quantitative estimates of project energy and fuel demand during construction and operations. This information amplifies the current impact discussion of the DEIR, which clearly demonstrates that the project's use of electricity and petroleum would not be wasteful or inefficient due to incorporation of energy- and fuel-efficient technology, including but not limited to, Tier 4 Final Engines in off-road equipment during construction, operation, and reclamation processes. Also, in an effort to reduce fuel consumption, the applicant has committed that all underground equipment will be powered by electricity. The project's annual operational use of electricity in megawatt-hours is only approximately 7% of the amount of electricity used in Nevada County in 2020 (see page 4.3-18 of the DEIR for the Nevada County electricity estimate).

Response to Comment Agcy 8-18

As stated on page 4.3-89 of the DEIR, The Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and found to

be consistent with the EAP. Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Agcy 8-19

The commenter asserts that the discussion in Section 4.3-9 of the DEIR refers only to the project's impacts and does not clearly discuss the cumulative impacts of the project combined with other projects. However, Section 4.3-9 includes the following discussion of cumulative development energy use "Increased efficiency will be ensured in the future as cumulative development occurs due to compliance with the State's robust energy efficiency requirements. For example, the 2019 CBSC has begun phasing in Zero Net Energy requirements by requiring residential projects to meet 100% of their electricity needs through rooftop solar. Cumulative residential development would include rooftop solar to meet 100% of each project's electricity demand. In addition, pursuant to 2019 CBSC, new non-residential buildings associated with cumulative development are also required to be solar ready." (DEIR, p. 4.3-102.) As such, the DEIR's analysis already analyzes the project's cumulative energy use impacts as combined with other cumulative projects. Comment noted.

Response to Comment Agcy 8-20

Please see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations.

Response to Comment Agcy 8-21

The commenter has not identified a new significant impact that was not addressed in the DEIR; therefore, recirculation is not required. Please also see Response to Comment 8-45 regarding criteria for recirculation.

Response to Comment Agcy 8-22

The commenter requests that the County submit the project's Final Drainage Report to the City of Grass Valley City Engineer for review and comment. The City of Grass Valley has no direct jurisdiction over the Final Drainage Report. Nonetheless, this comment will be provided to the County's decision makers for their consideration.

Response to Comment Agcy 8-23

The commenter asserts that the DEIR fails to adequately analyze the fact that the project sites are within the City's sphere of influence and does not analyze specific general plan policies associated with the City. However, the commenter does not identify any specific land use conflicts or impacts, and rather, generally asserts that more analysis is required. Pursuant to General Plan Policy 1.8.4, for all discretionary projects within a City's Sphere of Influence, the County shall first request that the City / Town determine whether or not it desires to annex the project. As required, the City of Grass held a Development Review Committee (DRC) Meeting on September 8, 2020 and determined that the City did not wish to pursue annexation of the project at that time. Furthermore, the City also provided comments to the County from the DRC meeting, which were reviewed as part of the development of the DEIR.

As stated on page 4.9-3 of the DEIR, "While the majority of the Sites are located in the City's sphere of influence and assigned General Plan land use designations by the City, the Sites are located within unincorporated Nevada County and are not proposed to be annexed to the City of Grass Valley." The County evaluated potential land use conflicts in Chapter 4.9 of the DEIR and concluded that potential land use conflicts were less than significant.



Response to Comment Agcy 8-24

The commenter asserts that mitigation measure 4.10-4 lacks timing and that the Ground Vibration Monitoring Program should be developed prior to operation of the mine. However, Mitigation Measure 4.10-4 is the Ground Vibration Monitoring Program, and is required to be implemented during any blasting on site. Data from the seismographs used during the Ground Vibration Monitoring Program will be used to develop an equation that can be used to modify blasting during subsequent mine operations to minimize impacts. No data can be collected by seismographs until blasting actually occurs at the project and the equation for site-specific ground vibration cannot be developed until measurements of vibrations from blasting are collected. Mitigation Measure 4.10-4 of the DEIR reflects the number and placement of seismographs recommended in the Blasting Report (Appendix M or the DEIR).

Mitigation Measure 4.10-4 is hereby revised as follows to clarify timing of installation and use of seismographs:

> 4.10-4 The Project Applicant shall conduct a project-specific Ground Vibration Monitoring Program, as set forth in this mitigation measure. As part of the Ground Vibration Monitoring Program, the mine shall employ between eight and ten seismographs, which shall be installed prior to any onsite blasting, and used during all blasting of levels above the 1,000-foot level. The seismographs shall be placed at the following locations:
>
> - *One at the Brunswick Shaft;*
> - *One at each of the four corners of the Mine Property;*
> - *One in the Whispering Pines Industrial Park;*
> - *Two at nearby residences; and*
> - *Two travelling seismographs which can change location depending on the weekly/monthly mining plan.*
>
> After the mine has stopped blasting at the proposed shaft and above the 1,000-foot level, only five seismographs would be required for the Ground Vibration Monitoring Program. One seismograph shall be located at the Brunswick Shaft and one in each of the four corners of the mine property. The five seismographs would collect relevant data throughout the entire operation to understand how the ground is transmitting vibration in these areas.
>
> Once mining operations commence, the Project Applicant shall hire a blast consultant to assist with the development of a 95 percent confidence level equation for the site-specific ground vibration. The blast consultant shall assess the data acquired by the seismographs using a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain below 0.4 in/s at sensitive receptors.
>
> Results of the Ground Vibration Monitoring Program and the equation for site-specific ground vibration shall be submitted to the Nevada County Planning Department, on a monthly basis, for review.

The above minor changes are for clarification purposes and do not affect the adequacy of the analysis contained in the DEIR, nor alter any conclusions.

Response to Comment Agcy 8-25

The commenter alleges that the hauling, dumping and compacting activities at the Centennial site will be beyond standard construction hours and will violate noise standards, creating significant noise impacts. However, the DEIR already acknowledges and analyzes the loading and dumping of trucks and spreading and compacting of material during the relevant hours, and concluded that noise impacts would be less than significant. As discussed in Response to Comment Agcy 8-4 above, and contrary to the commenter's assertion, hauling and dumping of loads will occur on the Centennial site between 6:00 AM and 10:00 PM, but no construction activities such as compaction or grading will occur prior to 7:00 AM. The EIR analyzed the noise during the proposed hours and locations of the various activities of the project including trucking, and did not identify any significant noise impacts. The project would comply with the applicable nighttime noise standards during the nighttime (6:00 AM – 7:00AM) hour of activity (See Chapter 4.10 of the DEIR).

Moreover, truck traffic on a public road is not a construction activity, so the movement of truck on the public streets is not a construction activity regulated by noise ordinances as construction noise. Neither the Centennial or Brunswick site is within a 500-foot radius of a residential zone in the City of Grass Valley, so the noise ordinance requirements cited by commenter are inapplicable. Impacts from noise of from trucks and dumping during the proposed hours has been analyzed in Chapter 4.10 of the DEIR.

Response to Comment Agcy 8-26

As stated on page 4.10-32 the noise increase from the placement and compaction of engineered fill at the Centennial site would be less than significant, based on application of relevant noise standards compared to expected project noise. The DEIR's characterization of the project noise at the Centennial site as "temporary" did not affect the impact analysis, so the commenter's dislike of that characterization is not relevant to the analysis. The commenter also alleges that construction noise will occur "when other construction activities are not allowed"; however, the placement and compaction of engineered fill is scheduled from 7:00AM to 3:30PM on Monday through Friday as stated in the project description and in Table 3-7 of the EIR. The only activities allowed prior to 7:00AM are hauling and dumping of engineered fill.

Response to Comment Agcy 8-27

In Table 4.10-6 of the DEIR the Baseline Ambient Conditions – Nighttime columns are mislabelled with Lmax shown in the first column and Leq in the second column. The label should be Leq in the first column and Lmax in the second columns (similar to the format of the rest of the table). The second column shows higher decibel values and is clearly representing Lmax. Table 4.10-6 is hereby corrected in the FEIR, on the following page, and this minor labelling error does not affect the analysis presented in the DEIR.

Response to Comment Agcy 8-28

The intersection of Idaho Maryland Road and Sutton Way currently is an all way stop and this is properly reflected in the Traffic Impact Analysis (TIA) in Appendix O of the DEIR and in Chapter 4.12 of the DEIR.

Response to Comment Agcy 8-29

The TIA and DEIR incorrectly used the Home-Based VTM per Worker, presented in Table A-3 of the SB743 Report as the threshold of significance for the project. The Total VMT per Service Population presented in Table A-4 should have been used as the threshold of significance in accordance with the Nevada County TIAG. The use of Total VMT per Service Population for Unincorporated Western Nevada County of 18.1 is the most conservative approach and the threshold of significance is 14.3% below the subarea mean with a value of 15.5 VMT per Service

Population. Sections 4.12.2 and 4.12.4 of the DEIR have been updated to reflect these changes in the FEIR, as follows.

Page 4.12-17 of the DEIR is hereby revised as follows:

> **Existing Vehicle Miles Traveled**
> VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. The available measures of VMT for Nevada County include the following:
>
> - Total VMT – the sum of VMT for all vehicle trips and trip purposes.

Table 4.10-1
Baseline Ambient Conditions and Adjusted Nevada County Noise Standards by Receptor

	Baseline Ambient Conditions[1]						Applicable Standards After Adjustment					
	Daytime[3]		Evening[3]		Nighttime[3]		Daytime		Evening		Nighttime	
Receptor[2]	L_{eq}	L_{max}	L_{eq}	L_{max}	~~L_{max}~~L_{eq}	~~L_{eq}~~L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	58	76	51	68	50	66	63	81	56	73	55	71
2	63	81	56	73	55	71	68	86	61	78	60	76
3	61	82	53	71	51	69	66	87	58	76	56	74
4	55	72	53	65	56	70	60	75	58	70	61	75
5	49	66	47	59	50	64	54	71	50	64	55	69
6	50	67	48	60	51	65	55	72	50	65	56	70
7	49	66	47	59	50	64	54	71	50	64	55	69
8	54	72	49	69	45	65	55	75	50	74	45	70
9	48	66	43	63	39	59	53	71	48	65	44	60
10	47	66	43	64	37	58	52	71	48	65	42	60
11	47	67	43	65	37	59	52	72	48	70	42	60
12	49	69	45	67	39	62	54	74	50	72	44	67
13	51	70	48	69	41	64	55	75	50	74	45	69
14	50	72	48	72	42	64	55	75	50	77	45	69
15	51	73	49	72	43	65	55	75	50	77	45	70
16	48	71	46	71	40	62	53	75	50	76	45	67
17	56	73	54	66	57	71	61	75	59	71	62	76
18	52	69	50	62	53	67	55	74	50	65	58	72
19	54	69	51	68	46	65	55	74	56	73	51	70
20	57	72	55	72	50	68	62	75	60	77	55	73
21	55	70	53	70	48	66	60	75	58	75	53	71
22	56	71	53	70	48	67	61	75	58	75	53	72
23	58	73	56	73	51	69	63	75	61	78	56	74
24	60	75	58	75	53	71	65	80	63	80	58	76
25	60	75	57	74	52	71	65	75	62	79	57	76
26	51	64	49	63	44	56	55	69	50	65	45	60
27	51	64	49	63	44	56	55	69	50	65	45	60
28	51	64	49	63	44	56	55	69	50	65	45	60
29	51	64	49	63	44	56	55	69	50	65	45	60

Table 4.10-1
Baseline Ambient Conditions and Adjusted Nevada County Noise Standards by Receptor

	Baseline Ambient Conditions[1]						Applicable Standards After Adjustment					
	Daytime[3]		Evening[3]		Nighttime[3]		Daytime		Evening		Nighttime	
Receptor[2]	L_{eq}	L_{max}	L_{eq}	L_{max}	$L_{~~max~~\underline{eq}}$	$L_{~~eq~~max}$	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
30	51	64	49	63	44	56	55	69	50	65	45	60

Notes:
1. Baseline ambient conditions at each representative receptor were established through extrapolating the Table 4.10-1 data closest to each receptor using a 4.5 dB per doubling of distance decay rate.
2. Receptor locations are indicated on Figure 4.10-2.
3. Daytime = 7:00 AM – 7:00 PM; Evening = 7:00 PM – 10:00 PM; Nighttime = 10:00 PM – 7:00 AM

Source: Bollard Acoustical Consultants, Inc. (2021).

- Residential VMT per capita – the sum of VMT for trips originating from home, divided by the number of residents.
- VMT per worker – the sum of VMT for trips from home to work, divided by the number of workers.

In July 2020, Fehr & Peers prepared Senate Bill 743, Vehicle Miles Traveled Implementation for the Nevada County Transportation Commission (NCTC). The NCTC in turn distributed the document to the various agencies within the County so each agency could develop their own significance threshold guidelines. Fehr & Peers recommends that VMT be expressed as a generation rate rather than a ratio. The County's recommended threshold of significance is on a per service population basis (Nevada County Traffic Impact Guidelines, June 2020). Because the proposed project is an industrial land use project, the calculated VMT per employee (worker) is also the VMT per service population~~County determined that the preferred significance threshold metric shall be VMT per worker (i.e., project employee)~~.

The subareas, based on similar travel characteristics and proximity, are recommended to be the following: the City of Grass Valley; the City of Nevada City; the Town of Truckee; Alta Sierra; Lake of the Pines; Lake Wildwood and Penn Valley; the remainder of western Nevada County; and the remainder of eastern Nevada County. Use of a subarea threshold acknowledges the differences in VMT generation in different parts of Nevada County.

Table 4.12-4 presents the results of the VMT measurement analysis that considers trips from outside the model as well as within the NCTC Travel Demand Model (TDM) ~~from several data sources including the NCTC Travel Demand Model (TDM), the California State Travel Demand Model, and MXD+, a trip generation tool developed by Fehr & Peers.~~ As noted in further detail in the Method of Analysis section below, the data in Table 4.12-4 was used to determine the significance threshold for the proposed project. Half of the project is located in the Grass Valley Subarea while half is located in unincorporated Western Nevada County~~The Grass Valley subarea was used as the basis due to the project's proximity to the City~~.

Table 4.12-4
~~Home-Based VMT per Worker~~Total VMT per Service Population

Location (SubArea)	NCTC TDM
Grass Valley	~~18.6~~28.0
Nevada City	~~26.6~~36.2
Truckee	N/A
Alta Sierra	~~27.8~~17.1
Lake Wildwood	~~34.3~~22.5
Penn Valley	~~18.6~~18.8
Lake of the Pines	~~25.0~~16.4
Unincorporated Western Nevada County	~~N/A~~18.1
Western Nevada County Total	22.2

Source: KDAnderson & Associates, Inc., 2021.

In addition, page 4.12-28, Section 4.12.4, Impacts and Mitigation Measures, is hereby revised as follows:

Vehicle Miles Traveled Standard of Significance
For the proposed project, a VMT impact may be considered less than significant if:

- The project's total weekday VMT per service population is equal to or less than 14.3 percent below the subarea mean under baseline conditions, or the project reduces the total VMT per service population for the subarea; and
- The project is consistent with the General Plan and the Nevada County Regional Transportation Plan.

As stated above, because the proposed project is an industrial land use project, the ~~County determined that the preferred significance threshold metric shall be~~ VMT per worker (i.e., project employee) is also the VMT per Service Population. The data in Table 4.12-4 was used to determine the significance threshold for the proposed project. Half of the project is located in the Grass Valley Subarea while half is located in unincorporated Western Nevada County. The subarea mean VMT per service population rates are 28.0 for Grass Valley and 18.1 for unincorporated Western Nevada County. The most conservative approach is to use the unincorporated Western Nevada County~~Grass Valley~~ subarea ~~was used as the basis due to the project's proximity to the City~~. Therefore, the proposed project would be considered to result in a significant impact related to VMT if the project would result in a VMT per worker ratio that is less than 14.3 percent below the subarea mean for the ~~Grass Valley~~unincorporated Western Nevada County subarea of 18.~~6~~1.

In addition, Impact 4.12-5, related to VMT, is hereby revised as follows:

4.12-5 Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). Based on the analysis below, the impact is *less than significant*.

Because the proposed project is an industrial land use project, the ~~County determined that the preferred significance threshold metric shall be~~ VMT per worker (i.e., project employee) is the VMT per service population. The ~~Grass Valley~~unincorporated Western Nevada County subarea was used as the basis ~~due to the project's proximity to the City~~as a conservative approach. As shown in Table 4.12-4, the ~~Grass Valley~~unincorporated Western Nevada County subarea has an associated ~~home-based~~ VMT per ~~worker~~ service population of 18.~~6~~1. As shown in Table 4.12-16~~ on a per worker basis~~, the proposed project is modeled to generate a daily rate per service population (employee) of ~~13.9~~14.4 VMT (~~under 2035 Plus Project Conditions~~in the 2020 base year), which is more than 14.3 percent below the ~~Grass Valley~~unincorporated area metric of 18.~~6~~1 VMT per worker. Therefore, the proposed project would result in a reduced VMT per service population for the applicable subarea.

Table 4.12-16
Rise Grass Valley Project Generated VMT Summary

Metric	~~2035 Future Year~~2020 Base Year
~~Total Daily Project VMT~~	~~1,538~~
~~Maximum Employees on Site (including Centennial employees)~~	~~111~~
Daily VMT per ~~Employee~~ Service Population	~~13.9~~14.4
Source: ~~Fehr & Peers~~KD Anderson, 2020~~2~~.	

In addition, because the proposed project is anticipated to employ approximately 312 direct employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the Project Applicant would be required to submit a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence.

Although the overall project site is not currently served by transit and the Nevada County Transit Services Division does not have plans to bring service to the project area, the nearest bus route to either the Brunswick Industrial Site or Centennial Industrial Site is Route #3, which operates between the Tinloy Street/Bank Street Transit Center and the Nevada County Airport and passes directly by the Centennial Industrial Site. The proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces). Pursuant to Nevada County LUDC, additional potential transportation reduction alternatives for the proposed project were identified in the Traffic Impact Analysis prepared for the proposed project, based on the Transportation Demand Management strategies included in the Vehicle Miles Traveled Implementation report prepared by Fehr & Peers for the NCTC, and include the following:

- **Commute Trip Reduction, #3.4.11, TRT-11: Provide Employer-Sponsored Vanpool/Shuttle:** This strategy would make a company sponsored vanpool/shuttle available to allow employees to commute in a single vehicle. Because employees of the proposed project are likely to be coming from throughout the area, the use of specific locations for pick up, such as existing Park-and-Ride lots in the County, would facilitate the reduction of commute vehicles.

  The proposed project could also institute a shuttle service between the project site(s) and the Tinloy Street/Bank Street Transit Center to provide a convenient location for employees to transfer from public transit or to be dropped off. A shuttle could operate several times each day, during the 7:00 AM and 7:00 PM shift changes and at the end of the administrative workday, after 3:30 PM.
- **Commute Trip Reduction, #3.4.3, TRT-3: Provide Ride-Sharing Programs:** This strategy involves the employer providing ride-share coordination and parking facilities to provide information for employees to ride share to and from work. This strategy is intended to match employees by location resulting in a reduction of commute vehicles. Rideshare activities would provide incentives for employees commuting to and from the site. Ridesharing could be coordinated between employees along a similar route from their residence to the work site. The use of existing Park-and-Ride lots may provide a location for employees to meet and commute together, reducing the number of vehicles in the roadway network. Three Caltrans Park-and-Ride locations exist in Nevada County, two in Penn Valley and one in Grass Valley; all are located along SR 20. A Park-and-Ride location also exists in Auburn for employees commuting along SR 49 from Placer County. Incentives may include the use of high-occupancy vehicle (HOV) lanes, less maintenance on a single vehicle due to reduced use, and cost sharing between employees/employer.

  Given that the proposed project would result in a VMT per ~~worker~~ service population ratio that is greater than 14.3 percent below the subarea mean for the ~~Grass Valley~~unincorporated Western Nevada County subarea of 18.~~6~~1, impacts associated with a conflict or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b), would be ***less than significant***.

  Mitigation Measure(s)
  None required.

The above-noted errors, which are hereby corrected, did not affect the DEIR's conclusion related to the project's VMT impact, which remains less than significant, as stated in the DEIR. Further details are provided in Response to Comments Agcy 8-38 below.

Response to Comment Agcy 8-30

The commenter asserts that passenger-car-equivalent (PCE) factors were not used in the traffic analysis to account for the different traffic impact caused by larger trucks; however, the traffic model software used by the traffic consultant account for PCE in the software, and the use of PCE factors are not necessary. As stated on page 25 of the TIA, Synchro and Synco/Simtraffic were utilized for the analysis depending on the intersection characteristics. These programs account for "PCE" to compute levels of service and queues based on the input truck percentages. An explanation has been added to the revised TIA. The Synchro files were updated to reflect the correct truck traffic percentages along the study roadways. All LOS and queuing results and accompanying tables in the TIA were updated to reflect the updated truck percentages. Please see Appendix N to this Final EIR for the updated TIA. No new impacts or mitigations were identified.

Response to Comment Agcy 8-31

As demonstrated in Response to Comment Agcy 8-30, the commenter has not identified a new significant impact or significant impact that is substantially more severe than disclosed the DEIR; therefore, recirculation is not required. Please also see Response to Comment 8-45 regarding criteria for recirculation.

Response to Comment Agcy 8-32

Existing and approved projects identified are listed on page 4.12-35 and continues on page 4.12-48 of the DEIR (after a number of figures), and includes the Loma Rica Ranch and Dorsey Marketplace projects. These projects were included and taken into consideration in the TIA and DEIR.

Response to Comment Agcy 8-33

As discussed on page 4.12-48 of the DEIR, the analysis of the long range 2035 cumulative condition is intended to consider the impact of the proposed project within the context of the Nevada County region buildout projected to occur by 2035. Year 2035 traffic forecasts were based on the most recent NCTC regional travel demand model and includes those projects identified in the EPAP scenario and other reasonably foreseeable cumulative growth.

A connecting road between Idaho-Maryland Road and E. Bennett Road does not currently exist. A road connection between Centennial Drive and E. Bennett St. (WU11) is included in the Nevada County Regional Transportation Plan (NCRTP) as an unconstrained (unfunded) project with no estimated construction date. Without the realization of additional revenues or funding by a future development it cannot be reasonably expected to be constructed prior to the year 2035, and is therefore not within the timeframe analyzed for project-related traffic impacts (See pages 78 and 83 of the NCRTP).

Response to Comment Agcy 8-34

Table 11 of the TIA provides the projected truck traffic for the site. A Passenger Car Equivalence (PCE) is not necessary to illustrate the truck volumes**.** As stated on page 25 of the TIA, Synchro and Synco/Simtraffic were utilized for the analysis depending on the intersection characteristics. These programs account for "PCE" to compute levels of service and queues based on the input truck percentages.

Response to Comment Agcy 8-35

The Synchro files were updated to reflect truck traffic percentages along the study roadways. Synchro and Simtraffic account for "PCE" to compute levels of service and queues based on the input truck percentages. The TIA report and its appendices have been revised to reflect this correction; please see Appendix N to this Final EIR.

Response to Comment Agcy 8-36

All LOS results and accompanying tables in the TIA were updated to reflect the updated truck percentages (Please see Appendix N to this Final EIR). In addition, Tables 4.12-2, 4.12-10, 4.12-11, 4.12-18, and 4.12-19 are hereby revised and provided in strike-through and underline format at the end of this letter. Trucks are fully represented as Synchro and Simtraffic account compute levels of service based on the input truck percentages. No new impacts or mitigations were identified.

Response to Comment Agcy 8-37

All queuing results and accompanying tables in the TIA were updated to reflect the updated truck percentages (Please see Appendix N to this Final EIR). In addition, Tables 4.12-14, 4.12-15, 4.12-22, and 4.12-23 are hereby revised and provided in strike-through and underline format at the end of this letter. Trucks are fully represented as Synchro and Simtraffic account compute queues based on the input truck percentages. No new impacts or mitigations were identified.

Response to Comment Agcy 8-38

Please see Response to Comment 8-29. Sections 4.12.2 and 4.12.4 of the DEIR have been updated to use the interpolated 2020 base year conditions in accordance with Section 7 of Nevada County Traffic Impact Analysis Guidelines (June 2020) (TIAG), which results in a project VMT per service population of 14.4.

Service Population is defined in the Nevada County TIAG (page 3) as the total number of residents, employees, and students. The project does not have residents or students and therefore the VMT per Employee is the VMT per Service Population for the project.

Section 7.0 of the Nevada County TIAG states that a project's VMT impact may be considered less than significant if the project total weekday VMT per service population is equal to or less than 14.3% below the subarea mean under baseline conditions.

The Nevada County Transportation Commission Senate Bill 743 Final Vehicle Miles Traveled Implementation report (SB743 Report) dated July 6th 2020 was used as the basis for the adoption of the Nevada County TIAG. Section 4.1 of this report states: *"Recommendation: Use total weekday VMT per service population (residents plus employees and students) as the measure of VMT."* And *"VMT per service population is how much VMT is generated by the residents, employee, and students of the project."*

The use of home-based VMT per resident and home-based work VTM per employee is discussed in Section 4.1 but only for screening purposes stating: Variation among model travel analysis zones (TAZs) in the mix of residential and work-related land uses may create anomalous patterns when screening using total VMT per service population, so, for screening purposes, two other measures may be useful.

The DEIR incorrectly used the Home-Based VTM per Worker, presented in Table A-3 of the SB743 Report as the threshold of significance for the project. The Total VMT per Service Population presented in Table A-4 should have been used as the threshold of significance in accordance with the Nevada County TIAG. The northern portion of the Brunswick site is partially in the Grass Valley sub-area and the southern portion is in the Unincorporated Western Nevada County subarea. The use of Total VMT per Service Population for Unincorporated Western Nevada County of 18.1 is the most conservative approach and the threshold of significance is 14.3% below the subarea mean with a value of 15.5 VMT per Service Population. Sections 4.12.2 and 4.12.4 of the DEIR have been updated to reflect these changes, as shown in Response to Comment Agcy 8-29. The above-noted errors, which are corrected in this Final EIR, did not affect the DEIR's conclusion related to the project's VMT impact, which remains less than significant, as stated in the DEIR.

Response to Comment Agcy 8-39

Figure 4.12-1 of the DEIR has been updated (see following page), along with Figures 3, 6A and 6B of the TIA (see Appendix N of this Final EIR) to reflect the roundabout at Main Street/Idaho Maryland Road and the southbound off-ramp at Brunswick Road has been added. No changes to the analysis or conclusions of the DEIR result from these minor corrections.

Response to Comment Agcy 8-40

Figures 4.12-2 through 4.12-4 and Figures 4.12-7 through 4.12-24 of the DEIR are derived from the TIA. The intersections are generally orientated with north towards the top of the page as indicated by the north arrow in each figure. Figure 4.12-1, as shown on the following page, provides an overview map showing the numbered intersections which assists to determine the orientation of the intersection figures. The street names in each intersection figure are not intended to assist with orientation.

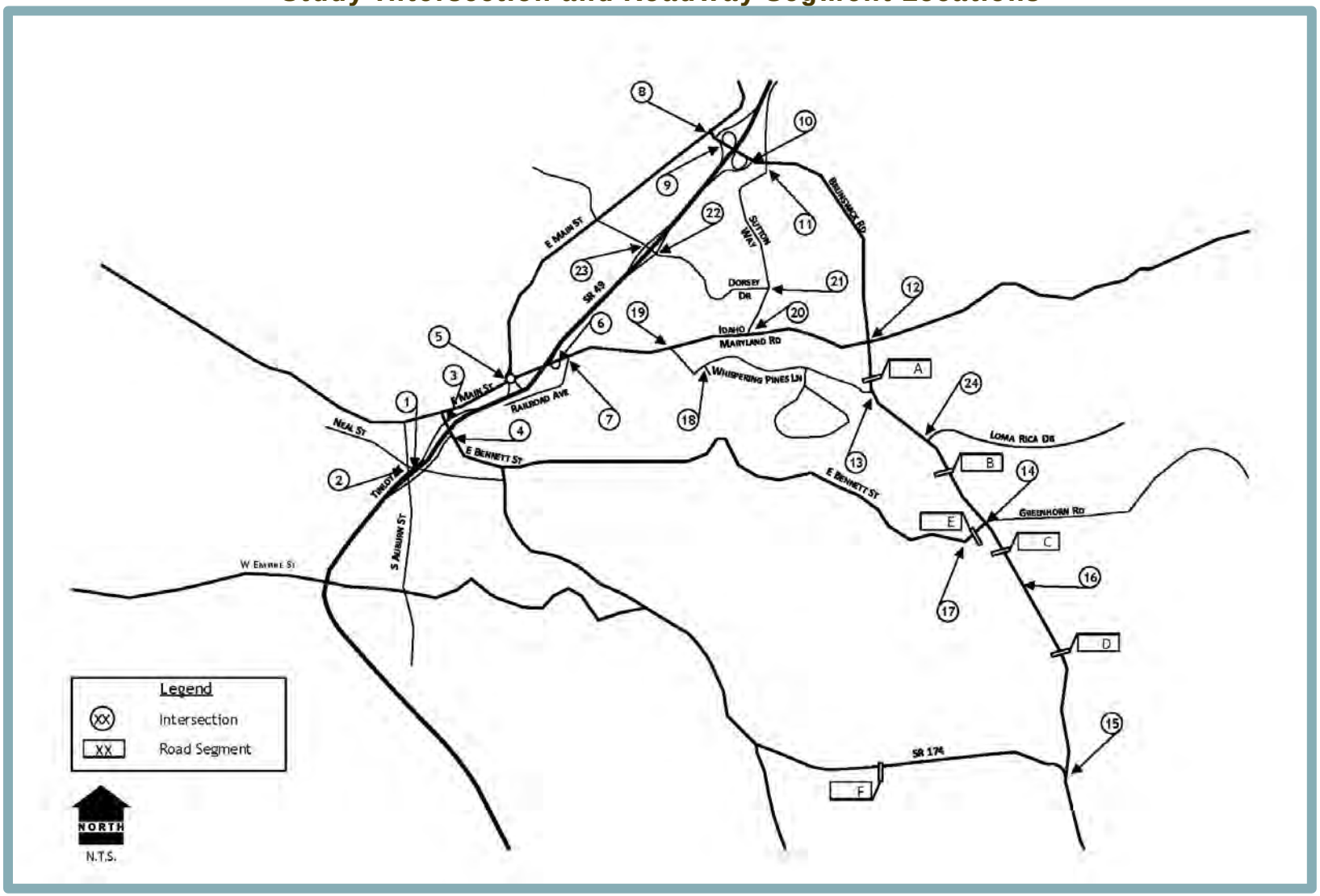
Response to Comment Agcy 8-41

The historic mining operation averaged approximately 1,000 tons per day of production in the years before the forced closure in 1942. The historic operation constructed a new headframe in 1942 with the intention of increasing mining depth to 5000 ft and doubling production to 2,000 tons per day. Therefore, a level of production of 1,000 tons per day is not speculatively large.

The number of years is not relevant in the analysis of Alternative 4. There is a finite amount of economic gold mineralization at the project, the extent of which is not known at this time and will likely not be known until it is depleted. If this given mass of material is mined at ½ of the rate it will take twice as long to complete mining.

The commenter proposes an alternative where the throughput is cut to 500 tons per day and the life of the mine remain the same length of time. Therefore, total mining would be 50% of the material mined in the base case. This alternative has already been examined in the DEIR (Alternative #4) and would not reduce any significant impact to less than significant. The significant and unavoidable aesthetics, construction noise, and traffic intersection impacts would remain significant and unavoidable. This alternative may be inconsistent with several policies of the General Plan (reduced employment, taxes, etc.) as explained on page 6-36 of the DEIR.

Figure 4.12-1
Study Intersection and Roadway Segment Locations



Source: KDAnderson & Associates, Inc., 20221.

Response to Comment Agcy 8-42

The commenter asserts that the proposed 80-year permit term is extreme and unprecedented in California. However, this is assertion incorrect. Permit terms of 100 years are routinely approved for large mining operations around California. As an example, Madera County approved a 100-year permit for the Vulcan Austin Quarry, which is a surface-mining operation that produces construction aggregate. Long permit terms are commonly requested for large mining operations because they are capital intensive, and it is not economically feasible to invest tens or even hundreds of millions of dollars on a project, when the number of years in which to obtain return on that investment are limited to only a few decades. The commenter presumes that a 500-tons per day throughput combined with a 30-year permit term is sufficient; but provides no evidence that this drastic change in the economics of the project would be feasible financially. Notably, the County already analyzed the 500-tons per day throughput alternative as Alternative 4 in the DEIR. The commenter also does not explain how the shorter permit term would reduce any significant impacts of the project. A shorter permit term would not avoid any of the significant impacts of the project, but would have less economic benefits to the County and would also potentially fail to meet one or more project objectives.

Response to Comment Agcy 8-43

The construction of a commercially viable, financeable, major underground gold mine operation that will produce 1,000 tons per day of gold mineralization and providing of jobs are project objectives. The complete elimination of the engineered fill placement on both Centennial and the Brunswick sites is not provided as an alternative. Such an alternative would not provide sufficient certainty for the financing of the construction of a major underground gold mine as it does not allow for a minimum amount of guaranteed storage space required to pay back the initial capital to construct the mine. The trucking of all materials off-site would also increase the project emissions due to the longer hauling distance versus the placement of fill on the Brunswick and Centennial sites.

Response to Comment Agcy 8-44

The DEIR has determined that the project will have a significant and unavoidable impact to aesthetics. Page 6-3 of the DEIR refers to the less-than-significant impact that would occur related to substantial adverse effects on scenic vistas.

Response to Comment Agcy 8-45

Please see Responses to Comments Agcy 8-2 through Agcy 8-44. The commenter has not identified a new significant impact that was not addressed in the DEIR or any other deficiency requiring recirculation; therefore, recirculation is not required. Section 1.4 of the Introduction chapter of this Final EIR includes a detailed discussion of the criteria for recirculation set forth in CEQA Guidelines Section 15088.5, demonstrating that recirculation is not required. The majority of that discussion is repeated here for convenience.

Pursuant to CEQA Guidelines Section 15088.5, Recirculation of an EIR Prior to Certification, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to

implement. Pursuant to 15088.5(a), "Significant new information" requiring recirculation include, for example, a disclosure showing that:

> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
> (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043)

The following discussion will evaluate the four above criteria and demonstrate that the changes to the DEIR text presented in Chapter 3 of this Final EIR do not require recirculation of the DEIR.

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

Pursuant to CEQA Guidelines Section 15088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. Chapter 3, Revisions to the Draft EIR Text, of this Final EIR includes several minor changes to the DEIR text as a result of public comment that serve the purpose of clarifying or amplifying the discussion in the EIR without identifying new significant impacts. The majority of modifications consist of small, targeted revisions, consisting of minor additions or deletions. A few modifications involve larger additions of text, but the relevant criterion is not the extent of the modification, but rather whether the added text identifies a new significant impact, which is not the case. See Section 1.4 of the Introduction Chapter of this Final EIR for further discussion.

As shown above, in response to public comment, it was determined that the truck traffic percentages along study roadways needed to be updated in the transportation analysis. These corrections were made to the transportation analysis, an updated version of which is included as Appendix N to this Final EIR; and Chapter 4.12, Transportation, of the DEIR has been revised accordingly in this Final EIR. For example, Tables 4.12-2, 4.12-10, 4.12-11, 4.12-18, and 4.12-19 of the DEIR, reporting study intersection levels of service (LOS), and Tables 4.12-14, 4.12-15, 4.12-22, and 4.12-23 reporting study intersection queues, were updated in strike-through and underline format. However, as demonstrated in this Final EIR, in no case do the revisions trigger a new significant impact at study intersections, when comparing the updated values to the thresholds of significance used in the DEIR. Thus, these corrections do not warrant recirculation of the EIR.

As also shown above, the DEIR incorrectly used the Home-Based VTM per Worker, presented in Table A-3 of the SB743 Report,[4] as the threshold of significance for the project. The Total VMT per Service Population presented in Table A-4 should have been used as the threshold of significance in accordance with the Nevada County Traffic Impact Analysis Guidelines (June

[4] The *Nevada County Transportation Commission Senate Bill 743 Final Vehicle Miles Traveled Implementation Report* (SB743 Report), 2020.

2020). The northern portion of the Brunswick Site is partially in the Grass Valley sub-area and the southern portion is in the Unincorporated Western Nevada County subarea. The use of Total VMT per Service Population for Unincorporated Western Nevada County of 18.1 is the most conservative approach and the threshold of significance is 14.3% below the subarea mean with a value of 15.5 VMT per Service Population. As shown in updated Table 4.12-16, the proposed project is modeled to generate a daily rate per service population (employee) of 14.4 VMT, which is more than 14.3 percent below the unincorporated area metric of 18.1 VMT per worker (i.e., 15.5). Sections 4.12.2 and 4.12.4 of the DEIR have been updated to reflect these changes, as shown in Response to Comment Agcy 8-29. The above-noted errors, which are corrected in this Final EIR, did not affect the DEIR's conclusion related to the project's VMT impact, which remains less than significant, as stated in the DEIR.

As discussed above, the remaining revisions to the DEIR, as presented in Chapter 3 of this Final EIR, are small, targeted revisions that serve to clarify or amplify the existing adequate DEIR. Many of these minor modifications pertain to mitigation language – see criterion #3 below. Please also refer to Chapter 3 for a review of those changes.

In summary, recirculation of the EIR is not required pursuant to criterion 1 of 15088.5.

2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

This criterion pertains to whether the Final EIR provides significant new information showing that a substantial increase in the severity of an environmental impact already identified in the DEIR would occur unless mitigation measures are adopted that reduce the impact to a level of insignificance. Nothing in the responses to comments, nor in the changes to the DEIR text shown in Chapter 3 of this Final EIR, results in a substantial increase in the severity of a significant environmental impact identified in the DEIR. Recirculation of the EIR is not required under this criterion.

3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

As shown in Chapter 3 of this Final EIR, as a result of public comment, several minor modifications are made to mitigation measures included in the DEIR. Under *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1993) 6 C4th 1112 (*Laurel Heights II*) and 15088.5(a)(3), when information added to the Final EIR consists of a suggested new project alternative or mitigation measure, recirculation is only required if the new alternative or mitigation measure meets all of the following criteria:[5]

- It is feasible;
- It is considerably different from the alternatives or mitigation measures already evaluated in the Draft EIR;

[5] Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act, Second Edition, March 2022 Update, Volume 2*. March 2022, pg. 16-21.

- It would clearly lessen the project's significant environmental impacts; and
- It is not adopted.

Recirculation is only required if *each* of the above tests is met.

In all cases where this Final EIR makes modifications to mitigation measures included in the DEIR, the updated mitigation measures are feasible and the applicant has agreed to implement the updated mitigation measures. No new mitigation measures are identified in this Final EIR, only revised mitigation measures that are not considerably different from the mitigation measure language already included in the DEIR. Thus, this criterion is not triggered by the minor modifications to mitigation measures and recirculation of the EIR is not required.

With respect to the portion of the comment pertaining to alternatives, several commenters suggested one or more additional alternatives for the County to consider. As discussed in this Final EIR, Section 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. This Final EIR demonstrates how the alternatives proposed by the commenters are either not considerably different from others previously analyzed in that they are not anticipated to eliminate any of the significant impacts of the project, and/or they are not feasible. Thus, this criterion is not triggered and recirculation of the EIR is not required.

4. <u>The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.</u>

According to Kostka and Zischke, this test for recirculation is based on the type of wholesale omission of information found in *Mountain Lion Coalition v. Fish & Game Comm'n*, in which the Draft EIR omitted any analysis of cumulative impacts, and a detailed analysis was first provided in the final EIR.[6] The record clearly demonstrates that no such wholesale omissions have occurred with the Idaho-Maryland Mine DEIR.

<u>Conclusion</u>

The above discussion (see also Section 1.4 of the Introduction Chapter) demonstrates that none of the 15088.5 criteria for recirculation are met.

[6] Stephen L. Kostka and Michael H. Zischke, *Practice Under the California Environmental Quality Act,* pg. 16-22.

Table 4.12-1
Project Traffic Hours Intersection LOS – Existing Conditions

Location - Jurisdiction	Control	6:30 – 7:30 AM		3:30 – 4:30 PM		6:30 – 7:30 PM		Meets Traffic Signal Warrant?
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	8.3	A	6.6	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.1	A	8.7	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.9	A	6.1	A	4.1	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.2	B	14.8	B	10.1	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.5	A	6.6	A	4.3	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~13.5~~14.4	C	~~18.2~~19.3	A	~~9.5~~9.8	No
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~10.7~~11.3	C	~~15.9~~17.1	A	~~8.5~~8.8	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	5.8	B	~~13.3~~14.2	A	~~8.7~~9.1	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~16.6~~15.8	B	~~19.8~~20.2	B	~~16.7~~15.8	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.6~~8.7	B	~~13.2~~13.3	A	~~9.2~~8.8	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~4.8~~4.7	C	~~21.3~~21.2	A	~~9.1~~9.2	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡								
NB Left	EB/WB Stop	A	~~8.0~~8.1	A	9.0	A	8.0	Yes*
SB Left		A	7.8	A	8.8	A	7.8	
EB		B	~~10.3~~10.5	B	~~13.7~~13.9	B	10.6	
WB		C	~~17.1~~17.3	**F**	**70.7**	B	14.6	
13. Brunswick Rd/Whispering Pines Ln ‡								
NB Left	EB Stop	A	8.4	A	9.1	A	8.3	Yes*
EB		B	10.8	B	14.1	B	10.6	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	10.6	C	17.4	B	10.5	Yes*
15. Brunswick Rd/SR 174 †								
SB	SB Stop	B	12.5	**E**	**35.1**	B	12.5	Yes*
EB Left		A	~~7.6~~7.7	A	7.8	A	7.4	
16. Brunswick Rd/Project Driveway †	EB Stop	Not Studied						
17. E. Bennett Rd/Millsite Rd †	NB Stop	Not Studied						

Table 4.12-1
Project Traffic Hours Intersection LOS – Existing Conditions

Location - Jurisdiction	Control	6:30 – 7:30 AM		3:30 – 4:30 PM		6:30 – 7:30 PM		Meets Traffic Signal Warrant?
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
18. Whispering Pines Ln/Centennial Site Driveway ‡	NB Stop	Not Studied						
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	B A	~~11.3~~10.8 ~~8.2~~8.1	**F** A	**59.1** 8.3	B A	10.1 7.6	No
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.1~~8.0	B	~~12.4~~12.5	A	8.0	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.0	B	11.8	A	8.2	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	7.9	B	13.6	A	7.8	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	3.7	A	9.1	A	5.3	N/A
24. Brunswick Road/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~13.9~~14.3	A	~~8.0~~8.1	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-2
Project Traffic Hours Intersection LOS – EPAP Plus Project Conditions (Scenario #1)

Location – Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	5.1	A	8.4	A	8.2	A	7.0	A	7.1	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.3	A	6.1	A	8.7	A	8.7	A	6.9	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.8	A	3.8	A	6.4	A	6.3	A	4.2	A	4.0	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.3	A	9.3	B	15.2	B	15.2	B	10.2	B	10.2	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.7	A	4.8	A	6.8	A	7.0	A	4.4	A	4.6	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	~~B~~C	~~14.9~~15.9	C	~~17.2~~18.9	C	~~22.6~~24.4	~~C~~D	~~23.7~~25.7	~~A~~B	~~9.9~~10.2	B	~~10.3~~10.6	Yes*
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.0~~11.4	B	~~11.5~~12.1	C	~~16.5~~17.8	C	~~17.0~~18.4	A	~~8.7~~9.1	A	~~8.9~~9.3	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~5.7	A	5.9	B	~~13.7~~13.6	B	13.4	A	~~9.0~~9.1	A	9.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~15.9~~16.5	B	~~16.8~~16.7	B	~~19.8~~19.5	~~B~~C	~~19.8~~20.5	B	~~16.5~~16.3	B	~~16.9~~17.0	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~9.1~~8.7	A	~~8.7~~8.5	B	~~13.5~~13.4	B	~~13.6~~13.8	A	9.0	A	~~8.9~~9.3	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	5.2	A	~~5.2~~5.0	C	21.5	C	~~22.0~~21.8	A	~~9.5~~9.6	A	~~9.2~~9.4	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡														
NB Left		A	~~8.0~~8.2	A	~~8.2~~8.4	A	~~9.0~~9.1	A	~~9.1~~9.2	A	8.0	A	8.2	
SB Left	EB/WB Stop	A	7.8	A	7.9	A	8.8	A	8.9	A	7.9	A	7.9	Yes*
EB		B	~~10.4~~10.6	B	~~11.3~~11.5	B	~~14.1~~14.2	B	~~14.1~~14.2	B	~~10.7~~10.8	B	~~11.2~~11.3	
WB		C	~~17.9~~18.1	D	~~25.4~~25.8	**F**	**83.7**	**F**	**~~98.2~~102.5**	C	15.3	C	18.3	
13. Brunswick Rd/Whispering Pines Ln ‡														
NB Left	EB Stop	A	8.4	A	8.8	A	9.1	A	9.1	A	8.3	A	8.5	Yes*
EB		B	10.9	B	11.4	B	14.5	B	14.8	B	10.6	B	11.1	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~10.7~~11.0	B	~~12.7~~13.3	C	~~18.5~~19.6	C	~~20.7~~22.0	B	~~10.8~~11.0	B	~~12.4~~12.8	Yes*
15. Brunswick Rd/SR 174 †														
SB	SB Stop	B	12.5	B	~~13.0~~13.1	**E**	**36.3**	**E**	**38.1**	B	12.6	B	13.0	Yes*
EB Left		A	~~7.6~~7.7	A	7.7	A	7.8	A	7.8	A	7.4	A	7.4	
16. Brunswick Rd/Project Driveway †														
NB Left	EB Stop	Not Studied		A	7.8	Not Studied		A	8.4	Not Studied		A	8.2	No
EB				B	11.5			B	12.5			B	11.7	
17. E. Bennett Rd/Millsite Rd †														
NB	NB Stop	Not Studied		A	8.5	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡														
NB	NB Stop	Not Studied		A	9.6	Not Studied		A	9.0	Not Studied		A	8.7	No
WB Left				A	7.8			A	7.5			A	7.4	
19. Idaho Maryland Rd/Centennial Dr ‡														
NB	NB Stop	B	11.3	B	12.2	**F**	**~~99.8~~100.9**	**F**	**112.3**	B	10.2	B	10.8	Yes*
WB Left		A	8.2	A	8.4	A	8.5	A	8.5	A	7.6	A	7.7	
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	8.1	A	8.5	B	~~13.9~~14.0	B	14.3	A	8.1	A	8.5	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.1	A	8.2	C	15.6	C	15.7	A	9.2	A	9.3	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	9.3	A	9.3	B	13.7	B	14.0	A	8.2	A	8.3	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	6.2	A	6.2	B	14.9	B	15.9	A	7.4	A	7.4	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~11.5~~11.7	B	~~14.2~~14.6	B	~~14.7~~15.2	A	~~8.3~~8.4	A	~~8.5~~8.6	N/A

- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-3
Project Traffic Hours Intersection LOS – EPAP Plus Project Conditions (Scenario #2)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	5.0	A	8.4	A	8.6	A	7.0	A	6.8	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.3	A	6.2	A	8.7	A	8.6	A	6.9	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.8	A	3.8	A	6.4	A	6.4	A	4.2	A	4.1	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.3	A	9.3	B	15.2	B	15.2	B	10.2	B	10.2	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.7	A	4.8	A	6.8	A	7.0	A	4.4	A	4.6	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	~~B~~C	~~14.9~~15.9	C	~~17.2~~18.9	C	~~22.6~~24.4	~~C~~D	~~23.7~~25.7	~~A~~B	~~9.9~~10.2	B	~~10.3~~10.6	Yes*
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.0~~11.4	B	~~11.5~~12.1	C	~~16.5~~17.8	C	~~17.0~~18.4	A	~~8.7~~9.1	A	~~8.9~~9.3	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~5.7	A	~~6.1~~6.0	B	~~13.7~~13.6	B	~~13.5~~14.3	A	~~9.0~~9.1	A	9.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~15.9~~16.5	B	~~16.8~~16.4	B	~~19.8~~19.5	C	~~20.3~~20.2	B	~~16.5~~16.3	B	~~16.4~~17.1	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~9.1~~8.7	A	~~8.7~~8.8	B	~~13.5~~13.4	B	~~14.0~~14.3	A	9.0	A	~~8.8~~9.2	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	5.2	A	~~5.3~~5.1	C	21.5	C	~~22.1~~22.5	A	~~9.5~~9.6	A	9.6	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡														
NB Left		A	~~8.0~~8.2	A	~~8.2~~8.4	A	~~9.0~~9.1	A	9.2	A	8.0	A	8.2	
SB Left	EB/WB Stop	A	7.8	A	7.9	A	8.8	A	8.9	A	7.9	A	7.9	Yes*
EB		B	~~10.4~~10.6	B	~~11.5~~11.6	B	~~14.1~~14.2	B	~~14.3~~14.4	B	~~10.7~~10.8	B	~~11.3~~11.4	
WB		C	~~17.9~~18.1	D	~~26.7~~26.8	**F**	**83.7**	**F**	**107.3**	C	15.3	C	18.8	
13. Brunswick Rd/Whispering Pines Ln ‡														
NB Left	EB Stop	A	8.4	A	8.8	A	9.1	A	~~9.1~~9.2	A	8.3	A	8.5	Yes*
EB		B	10.9	B	11.5	B	14.5	~~B~~C	~~14.9~~15.0	B	10.6	B	11.2	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~10.7~~11.0	B	~~12.7~~13.0	C	~~18.5~~19.6	C	~~20.7~~22.0	B	~~10.8~~11.0	B	~~12.4~~12.8	Yes*
15. Brunswick Rd/SR 174 †														
SB	SB Stop	B	12.5	B	13.0	**E**	**36.3**	**E**	**38.1**	B	12.6	B	13.0	Yes*
EB Left		A	~~7.6~~7.7	A	7.7	A	7.8	A	7.8	A	7.4	A	7.4	
16. Brunswick Rd/Project Driveway †														
NB Left	EB Stop	Not Studied		A	7.8	Not Studied		A	8.4	Not Studied		A	8.2	No
EB				B	11.5			B	12.5			B	11.7	
17. E. Bennett Rd/Millsite Rd †														
NB	NB Stop	Not Studied		A	8.5	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡	NB Stop	Not Studied		Not Applicable		Not Studied		Not Applicable		Not Studied		Not Applicable		
19. Idaho Maryland Rd/Centennial Dr ‡														
NB	NB Stop	B	11.3	B	12.2	**F**	**~~99.8~~100.9**	**F**	**112.3**	B	10.2	B	10.8	Yes*
WB Left		A	8.2	A	8.4	A	8.5	A	8.5	A	7.6	A	7.7	
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.1~~8.2	A	8.5	B	~~13.9~~14.0	B	14.3	A	8.1	A	8.5	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.1	A	8.2	C	15.6	C	15.7	A	9.2	A	9.3	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	9.3	A	9.0	B	13.7	B	13.7	A	8.2	A	8.4	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	6.2	A	6.1	B	14.9	B	15.6	A	7.4	A	7.3	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~11.5~~11.7	B	~~14.2~~14.6	B	~~14.7~~15.2	A	~~8.3~~8.4	A	~~8.5~~8.6	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-4
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	67	69	105	103	99	99
WB	150	86	86	139	126	95	92
2. S. Auburn St / Tinloy St							
NB through	80	78	73	115	117	78	73
NB through-left	80	55	53	76	78	53	52
SB	75	78	76	109	109	101	101
WB	95	84	85	99	99	79	75
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	27	28	41	42	31	28
NB through	150	46	45	54	56	47	47
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	38	38	<25	<25
SB through	150	<25	<25	95	95	35	35
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	26	26	<25	<25
SB	---	<25	<25	49	51	<25	<25
EB	---	30	32	63	60	28	29
WB	---	<25	<25	53	53	26	27
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~120~~133	~~163~~183	~~55~~63	~~55~~63	<25	<25
NB left	355	33	~~38~~33	63	63	<25	<25
WB	90	~~30~~33	~~35~~40	~~203~~220	~~220~~240	~~33~~35	~~40~~43
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~75~~80	~~88~~95	~~80~~98	~~83~~100	<25	<25
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~43~~44	~~42~~46	~~119~~122	~~114~~116	~~60~~58	~~55~~60

Table 4.12-4
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB left (2 lanes)	355	~~60~~65	~~66~~71	~~179~~175	~~173~~181	~~99~~105	~~100~~109
WB left (2 lanes)	150	~~45~~40	~~41~~44	~~9~~92	~~88~~87	~~61~~62	~~63~~64
WB right	150	~~54~~49	~~57~~50		~~148~~159	~~71~~77	~~72~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	<25	~~75~~63	~~77~~78	~~57~~55	~~54~~51
NB right	100	~~32~~30	28	~~135~~123	~~131~~134	~~85~~76	82
SB left (2 lanes)	260	~~117~~126	~~125~~135	~~191~~197	~~197~~208	~~136~~138	~~135~~149
SB right	260	47	~~50~~48	~~86~~84	~~79~~84	~~52~~55	~~55~~58
EB	160	~~47~~59	63	~~210~~201	207	~~123~~133	~~135~~137
WB left	145	62	~~62~~64	~~107~~106	~~103~~104	~~89~~90	~~96~~94
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~165~~153	~~159~~152	~~225~~224	221	~~177~~182	~~177~~196
NB right	---	~~93~~113	~~98~~110	~~245~~243	~~250~~252	~~91~~85	~~96~~95
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~56~~53	~~53~~58	~~241~~253	~~247~~259	~~110~~119	~~112~~114
SB left	190	~~43~~42	~~41~~39	~~102~~104	110	~~55~~58	~~57~~56
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~59~~55	~~55~~58	~~124~~133	~~122~~124	~~67~~69	~~64~~66
EB right	250	~~45~~48	~~47~~50	~~150~~157	~~155~~159	~~87~~84	~~82~~89
WB left	125	44	~~44~~40	~~144~~142	~~137~~135	~~69~~72	~~64~~70
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	<25	<25	<25	<25	<25	<25
SB left	120	<25	<25	<25	<25	<25	<25
EB right	---	<25	25	40	40	<25	<25
WB left	60	25	40	68	73	<25	<25
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	<25	<25	<25	<25

Table 4.12-4
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	30	205	215	43	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway							
NB	---	--	<25	---	<25	---	<25
WB left	100	---	<25	---	<25	---	<25
19. Idaho Maryland Rd / Centennial Dr							
NB	---	<25	<25	315	335	<25	<25
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	45	45	<25	<25
SB left	---	<25	<25	<25	<25	<25	<25
ÈB	---	<25	25	98	100	<25	<25
WB	---	<25	<25	63	70	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	38	38	<25	<25
SB thru	---	<25	<25	43	45	<25	<25
NB	---	<25	<25	98	98	<25	<25

Table 4.12-4
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB	---	<25	<25	110	110	40	40
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	112	113	104	108	56	60
NB right	215	41	43	98	96	48	51
EB left	180	60	60	155	150	56	66
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	50	50	58	60	48	48
SB left-thru	400	53	52	154	165	67	68
EB right	155	36	40	199	205	41	44
WB left	180	81	81	184	183	84	82
24. Brunswick Rd / Loma Rica Dr							
NB right	410	~~31~~32	~~31~~30	26	26	<25	<25
SB left	400	~~133~~137	~~146~~150	135	135	~~64~~65	~~68~~69
WB left	100	~~32~~33	~~35~~36	~~160~~163	~~160~~163	~~35~~36	38

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-5

EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	67	66	105	103	99	94
WB	150	86	87	139	138	95	89
2. S. Auburn St / Tinloy St							
NB through	80	78	71	115	109	78	76
NB through-left	80	55	52	76	67	53	52
SB	75	78	71	109	104	101	100
WB	95	84	82	99	103	79	75
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	27	27	41	43	31	32
NB through	150	46	45	54	56	47	45
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	38	38	<25	<25
SB through	150	<25	<25	95	95	35	35
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	26	26	<25	<25
SB	---	<25	<25	49	51	<25	<25
EB	---	30	32	63	60	28	29
WB	---	<25	<25	53	53	26	27
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~120~~133	~~163~~183	~~55~~63	~~55~~63	<25	<25
NB left	355	33	33	63	63	<25	<25
WB	90	~~30~~33	~~35~~40	~~203~~220	~~220~~240	~~33~~35	~~40~~43
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~75~~80	~~88~~95	~~80~~98	~~83~~100	<25	<25
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25

Table 4.12-5

EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
NB right	125	~~43~~44	~~39~~43	~~119~~122	~~126~~132	~~60~~58	~~59~~63
SB left (2 lanes)	355	~~60~~65	~~64~~72	~~179~~175	~~177~~193	~~99~~105	~~99~~104
WB left (2 lanes)	150	~~45~~40	~~36~~46	~~90~~92	88	~~61~~62	~~60~~64
WB right	150	~~54~~49	~~56~~58	~~153~~155	~~149~~163	~~71~~77	~~74~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	~~<25~~26	~~75~~63	~~75~~73	~~57~~55	52
NB right	100	~~32~~30	~~28~~30	~~135~~123	~~129~~131	~~85~~76	~~83~~81
SB left (2 lanes)	260	~~117~~126	~~127~~136	~~191~~197	~~199~~194	~~136~~138	~~143~~149
SB right	260	47	~~50~~53	~~86~~84	~~76~~97	~~52~~55	~~54~~52
EB	160	~~47~~59	~~56~~58	~~210~~201	~~204~~203	~~123~~133	~~128~~129
WB left	145	62	~~63~~57	~~107~~106	~~104~~108	~~89~~90	~~85~~90
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~165~~153	~~160~~165	~~225~~224	~~226~~231	~~177~~182	~~172~~182
NB right	---	~~93~~113	~~100~~113	~~245~~243	~~259~~257	~~91~~85	~~99~~97
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~56~~53	~~52~~57	~~241~~253	~~251~~268	~~110~~119	111
SB left	190	~~43~~42	~~41~~40	~~102~~104	~~105~~99	~~55~~58	~~56~~57
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~59~~55	~~60~~58	~~124~~133	~~128~~124	~~67~~69	~~63~~64
EB right	250	~~45~~48	46	~~150~~157	~~161~~154	~~87~~84	~~86~~80
WB left	125	44	~~45~~46	142	~~147~~152	~~69~~72	~~67~~70
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	<25	<25	<25	<25	<25	<25
SB left	120	<25	<25	<25	<25	<25	<25
EB right	---	<25	25	40	40	<25	<25
WB left	60	25	43	68	75	<25	<25
13. Brunswick Rd / Whispering Pines Ln							

Table 4.12-5

EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	<25	<25	<25	<25
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	30	205	215	43	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway **– Not Applicable**							
19. Idaho Maryland Rd / Centennial Dr							
NB	---	<25	<25	315	335	<25	<25
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	45	45	<25	<25
SB left	---	<25	<25	<25	<25	<25	<25
ÈB	---	<25	25	98	100	<25	<25
WB	---	<25	<25	63	70	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	38	38	<25	<25

Table 4.12-5

EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB thru	---	<25	<25	43	45	<25	<25
NB	---	<25	<25	98	98	<25	<25
EB	---	<25	<25	110	110	40	40
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	112	107	104	113	56	59
NB right	215	41	41	98	99	48	54
EB left	180	60	62	155	157	56	65
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	50	50	58	57	48	49
SB left-thru	400	53	57	154	151	67	69
EB right	155	36	39	199	196	41	41
WB left	180	81	77	184	179	84	84
24. Brunswick Rd / Loma Rica Dr							
NB right	410	~~31~~32	~~31~~30	26	26	<25	<25
SB left	400	~~133~~137	~~146~~150	135	135	~~64~~65	69~~68~~
WB left	100	~~32~~33	~~35~~36	~~160~~163	~~160~~163	~~35~~36	38

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-6
Project Traffic Hours Intersection LOS – Cumulative Plus Project Conditions (Scenario #1)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	6.7	A	6.9	A	9.0	A	9.0	B	11.7	B	12.2	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	7.2	A	7.1	A	9.9	A	9.5	A	9.0	A	9.1	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	4.1	A	4.1	A	8.0	A	7.6	A	4.4	A	4.5	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.6	A	9.6	C	18.3	C	18.3	B	10.7	B	10.8	Yes*
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	5.1	A	5.3	A	8.3	A	8.4	A	4.9	A	5.1	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~12.7~~13.5	B	13.3	~~B~~C	~~19.4~~22.7	B	19.6	B	~~11.9~~12.1	B	12.0	N/A
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.5~~11.9	B	11.7	~~B~~C	~~19.3~~24.0	B	19.4	B	~~12.2~~12.8	B	12.4	N/A
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~6.3	A	6.2	B	~~14.0~~14.6	B	14.2	A	~~9.8~~9.9	A	9.7	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~17.1~~17.6	B	18.1	B	~~16.9~~17.2	B	17.2	B	~~16.1~~16.3	B	16.4	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.3~~8.2	A	8.4	B	14.9	B	14.8	A	~~8.9~~8.6	A	8.7	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~5.3~~5.5	A	5.2	C	~~28.2~~28.9	C	30.2	B	~~10.7~~10.3	B	10.5	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡ NB Left SB Left EB WB	EB/WB Stop	B	~~17.3~~17.8	B	18.5	C	~~31.6~~32.8	C	32.5	B	~~18.1~~18.2	B	18.7	N/A
13. Brunswick Rd/Whispering Pines Ln ‡ NB Left EB	EB Stop	A B	8.4 11.0	A B	8.7 11.4	A C	9.4 19.3	A C	9.4 19.9	A B	~~8.3~~8.4 11.0	A B	8.5 11.3	Yes*
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~11.0~~11.3	B	13.0	~~C~~D	~~23.7~~25.6	D	27.2	B	~~10.9~~11.2	B	12.6	Yes*
15. Brunswick Rd/SR 174 † SB EB Left	SB Stop	A B	~~7.7~~7.8 ~~12.8~~12.9	A B	7.8 13.4	A **E**	7.8 **46.2**	A **E**	7.8 **48.9**	A C	~~8.2~~7.4 ~~17.5~~12.7	A B	7.4 13.1	Yes*
16. Brunswick Rd/Project Driveway † NB Left EB	EB Stop	Not Studied		A B	7.8 11.4	Not Studied		A B	8.5 12.9	Not Studied		A B	8.1 12.2	Yes*
17. E. Bennett Rd/Millsite Rd † NB	NB Stop	Not Studied		A	8.6	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡ NB WB Left	NB Stop	Not Studied		A A	9.7 7.8	Not Studied		A A	9.1 7.5	Not Studied		A A	8.7 7.4	No
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	A	~~6.7~~6.8	A	6.6	B	11.5	B	11.5	A	7.5	A	7.4	N/A
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.0~~8.1	A	8.4	B	14.2	B	14.5	A	7.9	A	8.1	Yes*
21. Sutton Way/Dorsey Dr ‡	AWS	A	9.0	A	9.1	**F**	**213.1**	**F**	**214.3**	B	10.4	B	10.5	Yes*
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	8.9	A	8.6	B	14.8	B	15.0	A	8.7	A	8.9	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	5.6	A	5.5	B	17.6	B	16.9	A	8.2	A	8.4	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.9~~12.1	B	11.6	B	~~14.8~~15.3	B	15.5	A	~~8.1~~8.2	A	8.2	N/A

- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-7
Project Traffic Hours Intersection LOS – Cumulative Plus Project Conditions (Scenario #2)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	6.7	A	7.2	A	9.0	A	9.7	B	11.7	B	12.4	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	7.2	A	7.2	A	9.9	B	10.0	A	9.0	A	9.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	4.1	A	4.0	A	8.0	A	7.6	A	4.4	A	4.5	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.6	A	9.6	C	18.3	C	18.3	B	10.7	B	10.8	Yes*
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	5.1	A	5.3	A	8.3	A	8.4	A	4.9	A	5.0	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~12.7~~13.5	B	~~13.3~~14.3	~~B~~C	~~19.4~~22.7	~~B~~C	~~19.6~~23.1	B	~~11.9~~12.1	B	~~12.0~~12.3	N/A
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.5~~11.9	B	~~11.7~~12.1	~~B~~C	~~19.3~~24.0	~~B~~C	~~19.4~~24.3	B	~~12.2~~12.8	B	~~12.4~~13.0	N/A
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~6.3	A	~~6.5~~6.2	B	~~14.0~~14.6	B	~~14.3~~14.1	A	~~9.8~~9.9	B	~~10.2~~10.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~17.1~~17.6	B	~~17.7~~17.9	B	~~16.9~~17.2	B	~~17.8~~17.1	B	~~16.1~~16.3	B	~~16.4~~16.0	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.3~~8.2	A	~~8.2~~7.8	B	14.9	B	~~14.9~~15.0	A	~~8.9~~8.6	A	~~8.7~~8.9	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~5.3~~5.5	A	~~5.3~~5.1	C	~~28.2~~28.9	C	~~30.0~~29.9	B	~~10.7~~10.3	B	~~10.7~~10.6	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡ NB Left SB Left EB WB	EB/WB Stop	B	~~17.3~~17.8	B	~~18.5~~19.2	C	~~31.6~~32.8	C	~~33.0~~34.3	B	~~18.1~~18.2	B	~~18.8~~19.0	N/A
13. Brunswick Rd/Whispering Pines Ln ‡ NB Left EB	EB Stop	A B	~~8.4~~8.5 11.0	A B	8.7 11.6	A C	9.4 19.3	A C	~~9.4~~9.5 20.0	A B	~~8.3~~8.4 11.0	A B	8.5 ~~11.3~~11.4	Yes*
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~11.0~~11.3	B	13.0	~~C~~D	~~23.7~~25.6	D	~~27.2~~29.4	B	~~10.9~~11.2	B	~~12.6~~13.0	Yes*
15. Brunswick Rd/SR 174 † SB EB Left	SB Stop	A B	~~7.7~~7.8 ~~12.8~~12.9	A B	7.8 ~~13.4~~13.0	A **E**	7.8 **46.2**	A **E**	7.8 **48.9**	A C	~~8.2~~7.4 ~~17.5~~12.7	A B	7.4 13.1	Yes*
16. Brunswick Rd/Project Driveway † NB Left EB	EB Stop	Not Studied		A B	7.8 11.4	Not Studied		A B	8.5 12.9	Not Studied		A B	8.1 12.2	Yes*
17. E. Bennett Rd/Millsite Rd † NB	NB Stop	Not Studied		A	8.6	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡	NB Stop	Not Studied		Not Applicable		Not Studied		Not Applicable		Not Studied		Not Applicable		
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	A	~~6.7~~6.8	A	~~6.6~~6.7	B	~~11.5~~11.8	B	~~11.5~~11.8	A	7.5	A	~~7.4~~7.5	N/A
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.0~~8.1	A	~~8.4~~8.5	B	14.2	B	14.5	A	7.9	A	8.1	Yes*
21. Sutton Way/Dorsey Dr ‡	AWS	A	9.0	A	9.1	**F**	**213.1**	**F**	**214.3**	B	10.4	B	10.5	Yes*
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	8.9	A	8.7	B	14.8	B	15.3	A	8.7	A	9.3	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	5.6	A	5.8	B	17.6	B	17.6	A	8.2	A	8.5	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.9~~12.1	B	~~11.6~~11.8	B	~~14.8~~15.3	B	~~15.5~~16.0	A	~~8.1~~8.2	A	~~8.2~~8.4	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-8

Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	84	80	116	115	119	120
WB	150	115	103	106	109	131	140
2. S. Auburn St / Tinloy St							
NB through	80	73	75	137	136	98	102
NB through-left	80	44	45	63	66	44	44
SB	75	86	84	139	134	123	133
WB	95	68	70	113	113	103	101
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	28	28	41	40	33	34
NB through	150	46	44	66	64	46	49
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	40	40	<25	<25
SB through	150	<25	<25	145	145	45	45
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	32	32	<25	<25
SB	---	<25	<25	70	72	25	25
EB	---	39	41	86	88	34	36
WB	---	<25	<25	66	68	32	33
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~39~~40	~~51~~53	~~48~~50	~~48~~50	<25	<25
NB left	355	~~81~~86	~~87~~92	~~151~~152	~~151~~152	~~5~~520	~~52~~53
WB	90	~~61~~65	~~68~~74	~~260~~276	~~266~~300	74~~72~~	~~78~~81
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~123~~134	~~136~~150	~~166~~181	~~166~~181	51~~47~~	57~~53~~
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~42~~44	~~43~~46	~~130~~133	~~139~~135	~~59~~65	~~62~~61

Table 4.12-8

Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB left (2 lanes)	355	~~68~~67	~~67~~65	~~175~~180	~~176~~175	~~106~~102	~~109~~106
WB left (2 lanes)	150	~~43~~44	44	~~97~~104	~~102~~98	67~~75~~	~~71~~69
WB right	150	~~47~~52	~~51~~56	149	~~159~~152	79~~69~~	~~74~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	~~28~~29	~~68~~76	~~66~~71	53~~54~~	~~53~~52
NB right	100	~~30~~32	~~30~~29	~~131~~122	~~117~~118	91~~84~~	~~85~~76
SB left (2 lanes)	260	~~134~~144	~~142~~148	~~148~~150	~~151~~149	144~~140~~	~~133~~139
SB right	260	~~45~~49	~~46~~44	84	86	52~~54~~	~~56~~51
EB	160	~~61~~60	65	~~202~~199	~~203~~201	~~128~~133	~~141~~139
WB left	145	~~61~~66	~~61~~58	~~106~~108	~~106~~105	92~~90~~	~~93~~95
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~141~~147	~~152~~151	~~215~~223	~~218~~224	~~180~~173	~~177~~179
NB right	---	~~106~~115	~~102~~117	~~262~~261	~~258~~254	95~~110~~	~~97~~103
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~58~~60	~~55~~61	~~435~~467	~~545~~511	~~141~~146	~~136~~150
SB left	190	~~38~~37	37	~~115~~113	~~110~~101	51~~52~~	57
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~61~~57	~~53~~58	~~127~~147	~~138~~137	70~~66~~	~~63~~69
EB right	250	~~52~~53	~~50~~51	~~224~~215	~~220~~222	~~98~~104	~~96~~114
WB left	125	~~48~~49	~~49~~47	~~177~~170	~~179~~182	74~~84~~	~~79~~77
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	~~90~~92	~~108~~112	~~151~~152	~~166~~170	56	~~76~~77
SB left	120	<25	<25	188	188	~~103~~104	~~106~~108
EB left	150	34	25	74	74	39	~~39~~40
WB left	175	~~100~~104	~~99~~101	68	68	43	~~43~~44
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	58	60	<25	<25

Table 4.12-8

Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	28	248	260	45	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway							
NB	---	---	<25	---	<25	---	<25
WB left	100	---	<25	---	<25	---	<25
19. Idaho Maryland Rd / Centennial Dr							
NB	---	~~28~~29	29	~~285~~302	~~285~~302	29	30
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	48	48	<25	<25
SB left	---	<25	<25	35	35	<25	<25
ÈB	---	<25	<25	105	105	<25	<25
WB	---	<25	<25	55	60	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	28	28	<25	<25
SB thru	---	<25	<25	190	190	<25	<25
NB	---	30	30	1333	1340	58	60

Table 4.12-8

Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB	---	25	25	188	188	<25	25
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	98	103	125	120	58	54
NB right	215	59	57	97	100	62	59
EB left	180	63	60	180	177	65	67
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	53	52	63	64	49	49
SB left-thru	400	43	42	165	162	64	67
EB right	155	41	44	218	217	40	42
WB left	180	73	74	253	250	108	111
24. Brunswick Rd / Loma Rica Dr							
NB right	410	32	~~32~~31	27	27	<25	<25
SB left	400	~~134~~137	~~146~~151	~~147~~148	~~147~~148	~~69~~70	~~74~~75
WB left	100	~~35~~36	38	178	178	~~3~~37	~~38~~39

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Highlighted values indicate queue length in excess of available storage with more than 25-foot increase from No Project condition.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-9

Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	84	86	116	117	119	118
WB	150	115	116	106	110	131	144
2. S. Auburn St / Tinloy St							
NB through	80	73	76	137	144	98	97
NB through-left	80	44	46	63	69	44	45
SB	75	86	84	139	137	123	129
WB	95	68	69	113	117	103	93
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	28	26	41	40	33	34
NB through	150	46	47	66	64	46	48
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	40	40	<25	<25
SB through	150	<25	<25	145	145	45	45
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	32	32	<25	<25
SB	---	<25	<25	70	71	25	25
EB	---	39	41	86	88	34	34
WB	---	<25	<25	66	67	32	32
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~39~~40	~~51~~53	~~48~~50	~~48~~50	<25	<25
NB left	355	~~81~~86	~~87~~92	~~151~~152	~~151~~152	~~50~~52	~~52~~53
WB	90	~~61~~65	~~68~~74	~~260~~276	~~266~~300	~~72~~74	~~78~~81
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~123~~134	~~136~~150	~~166~~181	~~166~~181	~~47~~51	~~53~~57
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25

Table 4.12-9

Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
NB right	125	~~42~~44	~~43~~45	~~130~~133	~~134~~136	~~59~~65	~~70~~68
SB left (2 lanes)	355	~~68~~67	~~66~~73	~~175~~180	~~177~~173	~~106~~102	~~117~~116
WB left (2 lanes)	150	~~43~~44	~~47~~46	~~97~~104	~~106~~100	~~75~~67	~~73~~71
WB right	150	~~47~~52	~~55~~58	~~149~~149	~~155~~168	~~69~~79	~~73~~81
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	<25	~~68~~76	~~69~~70	~~54~~53	~~51~~52
NB right	100	~~30~~32	~~30~~28	~~131~~122	~~128~~121	~~84~~91	~~83~~78
SB left (2 lanes)	260	~~134~~144	~~144~~151	~~148~~150	~~149~~158	~~140~~144	~~140~~147
SB right	260	~~45~~49	~~50~~46	84	~~86~~82	~~54~~52	52
EB	160	~~61~~60	~~62~~68	~~202~~199	~~205~~204	~~128~~133	~~139~~147
WB left	145	~~61~~60	~~65~~60	~~106~~108	~~107~~108	~~90~~92	~~89~~94
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~141~~147	~~153~~137	~~215~~223	~~225~~230	~~180~~173	179
NB right	---	~~106~~115	~~94~~103	~~262~~261	~~259~~263	~~110~~95	~~96~~98
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~58~~60	~~56~~55	~~435~~467	~~490~~507	~~141~~146	~~139~~140
SB left	190	~~38~~37	39	~~115~~113	~~113~~116	~~52~~51	54
SB right	180	---	---	---	---	---	---
EB left (2 lanes)	185	~~61~~57	~~60~~57	~~127~~147	134	~~66~~70	62
EB right	250	~~52~~53	50	~~224~~215	~~208~~224	~~98~~104	95
WB left	125	~~48~~49	~~47~~50	~~177~~170	~~181~~180	~~84~~74	79
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	~~90~~92	~~108~~113	~~151~~152	~~166~~170	56	77
SB left	120	<25	<25	188	188	~~103~~104	~~107~~109
EB left	150	34	<25	74	74	39	~~39~~40
WB left	175	~~100~~104	~~99~~102	68	68	43	44

Table 4.12-9

Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	58	60	<25	<25
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	28	248	260	45	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway – Not Applicable							
19. Idaho Maryland Rd / Centennial Dr							
NB	---	~~28~~29	29	~~285~~302	~~285~~302	29	30
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	48	48	<25	<25
SB left	---	<25	<25	35	35	<25	<25
ÈB	---	<25	<25	105	105	<25	<25
WB	---	<25	<25	55	60	<25	<25
21. Sutton Way / Dorsey Dr							

Table 4.12-9

Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB right	120	<25	<25	28	28	<25	<25
SB thru	---	<25	<25	190	190	<25	<25
NB	---	30	30	1333	1340	58	60
EB	---	25	25	188	188	<25	25
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	98	101	125	128	58	52
NB right	215	59	60	97	101	62	63
EB left	180	63	63	180	174	65	75
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	53	52	63	59	49	49
SB left-thru	400	43	38	165	161	64	69
EB right	155	41	42	218	220	40	49
WB left	180	73	76	253	249	108	114
24. Brunswick Rd / Loma Rica Dr							
NB right	410	32	~~32~~31	27	27	<25	<25
SB left	400	~~134~~137	~~146~~151	~~147~~148	148~~1~~	~~69~~70	~~74~~75
WB left	100	~~35~~36	38	178	178	~~36~~37	~~38~~39

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Highlighted values indicate queue length in excess of available storage with more than 25-foot increase from No Project condition.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Agency Letter 9

Nevada County Historical Landmarks Commission
P.0. Box 1014
Nevada City, California 95959
info@nevadacountylandmarks.com
530-274-7118

21 January 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, Cal., 95959

Via email: Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

At this morning's meeting, the Nevada County Historical Landmarks Commission approved these comments on the Draft Environmental Impact Report (Draft) for the Idaho-Maryland Mine Project.

Agcy 9-1

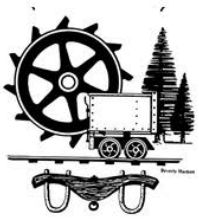
We express no views on the many environmental, health and safety issues presented by this ambitious project. With respect to the historical preservation issues, we note the following:

Agcy 9-2

1. Evaluation of the proposed project must start with the fact that in 1984, the Board of Supervisors declared the Idaho-Maryland Mine Site a Historical Landmark--NEV 33. This project should be evaluated in that context and not whether the Mine Site is on the national or state historical registers.

Agcy 9-3

2. The Draft assumes that the County's designation was limited to the area the Draft calls the Centennial Site, which is reportedly outside the project area, and concludes that therefore the Board's determination that it is a historical landmark "need not be addressed." That is at best incorrect; at worst disingenuous. The designation was for the entire Idaho-Maryland Mine, "one of the 'Big Three';" not merely the portion of the mine around the Centennial and Whispering Pine Roads, where its headquarters building is located. The Newsome drill, specifically mentioned in the designation, was extensively used outside the Centennial Site, The fact that the Mine Site is a historical landmark must be addressed.



Agcy 9-4 3. The Commission does not have engineering expertise to enable it to judge whether the work the developer is proposing will adversely impact the historical features of the Mine. We expect the County to do that.

Agcy 9-5 4. We had earlier noted a concern that the Round Hill shaft be preserved. It does not appear that that will happen.

Agcy 9-6 5. We remain of the view that sharing records will not mitigate any harm the project might cause.

Agcy 9-7 Finally, the Draft acknowledges the significant impact that Errol MacBoyle had on Nevada County. If this project is permitted to proceed, we suggest that the developer be required to erect a suitable monument commemorating Mr. MacBoyle. Currently, there is none such in the County.

Agcy 9-8 We look forward to reviewing a draft Environmental Impact Report which properly and adequately considers the historical features of the landmark that is the Idaho-Maryland Mine Site.

Yours truly,

Bernard Zimmerman

Bernard Zimmerman, Chair

cc. Landmarks Commissioners
Gage McKinney

AGENCY LETTER 9: BERNARD ZIMMERMAN, NEVADA COUNTY HISTORICAL LANDMARKS COMMISSION

Response to Comment Agcy 9-1

The commenter states that the Nevada County Historical Landmarks Commission (Commission) approved the following comments at its January 21, 2022 meeting and expresses no views on the environmental or health and safety impacts of the project. Comment noted. This is an introductory comment and does not provide a comment on any environmental issue associated with the project.

Response to Comment Agcy 9-2

The commenter states that "evaluation of the project must start with the fact that in 1984, the Board of Supervisors declared the Idaho-Maryland Mine [IMM] Site a Historical Landmark." The County's environmental review is required to comply with the requirements of the California Environmental Quality Act (CEQA). As it pertains to cultural resources, CEQA Appendix G outlines four criteria the environmental document should evaluate. Two of the four pertain to significant changes to a historical or archaeological resource as defined by Public Resources Code section 15064.5. DEIR Chapter 4.5 includes analysis of identified historic and archaeological resources consistent with CEQA Appendix G, which was supported by a site-specific cultural resources survey prepared by a qualified archeologist meeting the Secretary of the Interior's Professional Qualification Standards. (DEIR, Appx. G.) The DEIR found that any substantial adverse changes to historical or archaeological resources would be less than significant after mitigation. (DEIR, pp. 4.5-22, 30.)

Response to Comment Agcy 9-3

The commenter states that the DEIR inaccurately assumes County's designation of the IMM as a Nevada County Historical Landmark (NEV-33) falls outside the Area of Potential Effects. It is unclear what records the commenter is referencing to make an assertion that NEV-33 included the entire IMM. The Project Applicant's cultural resources expert and the County conducted coordination with Bernard Zimmerman, chair of the Nevada County Historical Landmarks Commission. As outlined in the DEIR, significant outreach and research was undertaken to assess the NEV-33 landmark. (DEIR, p. 4.5-19–21.) Based on this research, the County concluded NEV-33 is outside the project boundary. If, as asserted by the commenter, NEV-33 includes the entire IMM, then this feature was analyzed in the cultural resources technical study and DEIR. Impact 4.5-1 looked at the remaining aboveground and underground components of IMM and concluded the remaining above-ground facilities did not meet NRHP or CRHR criteria. The underground components of Idaho Maryland Mine, despite being inaccessible, could be a contributing element to the Idaho Maryland historic district and a potentially significant impact could occur. Mitigation Measure 4.5-1(a) was provided that reduces this impact to a less than significant level. (DEIR, p. 4.5-22.)

Response to Comment Agcy 9-4

The commenter states it does not have engineering expertise to determine whether the project will impact the historical features of the IMM. Comment noted. Please see Responses to Comments Agcy 9-2 and Agcy 9-3.

Response to Comment Agcy 9-5

The commenter states it is concerned that the Round Hill shaft will not be preserved. The Round Hill shaft will not be used as part of the project and is not within the limits of proposed surface disturbance.

Response to Comment Agcy 9-6

The commenter states that it believes sharing records will not mitigate any harm the project might cause. Comment noted. Please see Master Response 1.

Response to Comment Agcy 9-7

The commenter suggests that should the project be approved, the Project Applicant should be required to erect a monument in dedication of Errol McBoyle. Comment noted. Please see Master Response 1.

Response to Comment Agcy 9-8

The commenter states that it looks forward to reviewing a DEIR that adequately considers the historical features of the IMM. This is a conclusory comment and does not provide a comment on an environmental issue associated with the project. Please see the above responses.

Agency Letter 10

Nevada Irrigation District

Water for Life

VIA EMAIL: Idaho.MMEIR@co.nevada.ca.us

March 25, 2022

Mr. Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Re: Nevada Irrigation District Comments for the Idaho Maryland Mine Project Draft Environmental Impact Report

Dear Mr. Kelly:

Nevada Irrigation District (NID) is in receipt of the Draft Environmental Impact Report (DEIR) for the Idaho Maryland Mine Project. This letter conveys recommendations and concerns regarding the project that are germane to NID's statutory responsibilities. The comments are categorized by type.

East Bennet Road Potable Waterline

Agcy 10-1

The DEIR proposes the installation of a NID potable water line along East Bennett Road to provide an alternate source of water should existing ground water wells be depleted from mine dewatering. The DEIR depicts the pipeline as being contained with the existing right-of-way along East Bennet Road; however, NID will require the pipeline to interconnect with NID's existing water distribution system in the Whispering Pines Lane area. The connection to existing NID infrastructure will necessitate the crossing of multiple parcels that do not contain an existing roadway/right-of- way. Additionally, connection to NID will occur near Clydesdale Court, which will require a short section of alignment within the right-of-way along Whispering Pines Lane. The Draft EIR does not contemplate this cross-country extension nor the short run up Whispering Pines Lane. NID expects the complete alignment of the East Bennett potable water line including the interconnection

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on Whispering Pines Lane be included in the final EIR and be identified in the conditions of approval for the project. In addition, all easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the Applicant and conveyed to NID prior to acceptance of the new potable line. All costs for the above must be borne by the Applicant.

Agcy 10-2

The DEIR makes multiple references to the construction of the East Bennet potable water line being constructed to County guidelines. However, NID is the responsible agency for potable water infrastructure; therefore, all construction involving, or connecting to NID infrastructure must be constructed to NID standards. This correction as it relates to potable water infrastructure is necessary throughout the document.

East Bennet Road NID Potable Water Connection Mitigations

Agcy 10-3

The DEIR requires connection of 30 properties along East Bennett Road (4.8-29(c)) that are currently supplied water via wells. Properties that connect to NID's potable water line and keep their existing wells will require a Double Check Valve (DCV) to prevent any potential backflow into NID's system. DCV installation will increase initial installation costs and require a monthly fee on the consumptive water bill. NID considers the additional installation and ongoing DCV costs as a necessary part of mitigation and should be paid for by the Applicant for the duration of dewatering and mine operations.

Agcy 10-4

The Applicant proposed to cover the connection and consumptive costs of NID potable water usage for parcels along East Bennet Road. The mitigation includes paying for all connection costs as well as covering the consumptive rate for up to 400 gallons per day. 400 GPD does not match the amount of water proposed within the Final Idaho Maryland Mine Water Supply Assessment provided to NID. The Water Supply Assessment estimates the average consumption of the 31 parcels to be .4 gallons per minute per dwelling. This equates to a total daily usage of 576 gallons per day and should be the amount of consumptive use the Applicant will pay as a mitigation for any connection along the East Bennett corridor. During the WSA hearing, NID's Board of Directors expressed serious concerns that the number of impacted wells could far exceed the 30 estimated by the DEIR. NID proposes the Applicant conduct a more extensive and robust well and ground water monitoring effort prior to and during any dewatering.

Agcy 10-5

Should the number of private wells impacted exceed the 30 that the Applicant estimates, NID believes the Applicant should guarantee and include in its proposed mitigation potable water for each well that is impacted.

Agcy 10-6

The DEIR includes a mitigation measure to pay for consumptive water use for parcels along East Bennet Road that connect to NID until the property is sold by the owner, or until the property is annexed into the City of Grass Valley. NID believes the Applicant

should cover cost of consumptive use for each impacted well in the volume stated above (regardless of ownership or annexation) for as long as the project is operating and for a period of 24 months after project is complete or abandoned. This includes initial mine dewatering as well as continued mine operations

Agcy 10-7 In order to establish a baseline of the number and quality of wells outside of the East Bennett area, NID suggests the Applicant undertake advance sampling of both water quality and production for the wells located in the Woodrose, Greenhorn and Beaver Lane areas.

Agcy 10-8 The estimates within the GHG emissions modeling (page 351) assumes 26 residences would be switched from well water to NID potable water. Other portions of the DEIR require connection of 30 parcels to NID's potable water system. This discrepancy should be corrected, and the total amount of water use should match the WSA document of .4 gallons per minute per dwelling unit.

Area of Ground Water Depletion

During the WSA hearing, NID's Board of Directors expressed serious concerns that the number of impacted wells could far exceed the 30 estimated by the DEIR. NID proposes the Applicant conduct a more extensive and robust well and ground water monitoring effort prior to, and during any dewatering. Should the number of private wells impacted exceed the 30 estimated by the Applicant, NID believes the Applicant should guarantee and include in its proposed mitigation potable water for each well that is impacted.

Agcy 10-9 The DEIR includes modeling analysis of anticipated effects to ground water levels after initial mine dewatering and long-term ground water levels related to general operations over the term of the project. The document specifies that the Applicant will implement a rigorous Ground Water Monitoring Plan (GWMP) to assess how the hydrogeologic system responds to mining. The GWMP is proposed to establish multiple monitoring wells to provide data analysis of groundwater throughout the project area. NID requests the monitoring wells be placed near locations with the greatest concentration of existing ground water wells, specifically the Greenhorn, Woodrose, and Beaver Lane areas. The strategic placement of monitoring wells will provide an early warning of any adverse effects of dewatering. The monitoring wells should mirror the average depth of the residential wells in the area and be in sufficient number and locations to provide for accurate data. Early awareness will allow the Applicant to halt dewatering and develop alternative water supply options for affected areas.

Agcy 10-10 One of the potential outcomes of dewatering the mine includes the negative effect to local ground water well production beyond the wells that have already been identified to be impacted in the DEIR. As referenced in the DEIR, the Applicant will be required, at their

cost, to provide an alternate water supply for any well impacted. However, there is no financing mechanism to ensure any additional wells that are impacted beyond the 30 wells identified are able to connect to potable water. NID, as the sole surface water provider in the area, is concerned that the level of infrastructure necessary to extend water to affected wells beyond Bennet Road area would come at a substantial cost. NID estimates extending infrastructure and connecting customers in the Greenhorn, Woodrose, and Beaver area is estimated to be $14 Million. These costs include both pipeline costs and connection fees. Additionally, construction of this magnitude will require a substantial amount of time to complete. NID requests that a mitigation measure and condition of approval require the Applicant to put forth bonds or other form of financial security to cover the costs of such infrastructure for a period of 5 years beyond the completion of initial dewatering of the mine. This will help ensure the communities surrounding mine operations will have some assurance of funding to complete an alternate water supply should it become necessary.

Wolf Creek Discharge

The DEIR proposes to dewater the underground workings of the Idaho Maryland Mine, via pumping, treatment, and discharge operations to the South Fork of Wolf Creek. NID is an authorized diverter of imported and natural flows in Wolf Creek. The location of NID's diversion will allow for the recapture of the treated ground water discharge from the Mine. To properly manage flows, promote water efficiency, and protect habitat in Wolf Creek, NID will need access to real-time discharge flows into Wolf Creek. NID recommends a publicly accessible web page that provides real time data along with flow trending over a one-week period. Additionally, any planned outage in the treatment process that would interrupt flows into Wolf Creek should be communicated to NID one week in advance. This information will allow NID to adjust imports into Wolf Creek to meet the needs of end users and maximize beneficial use.

Agcy 10-11

As stated above, NID diverts a mixture of natural and imported flows from Wolf Creek to provide irrigation water to 715 customers. While NID does not have jurisdiction over water quality flowing into Wolf Creek, NID, along with Nevada County Environmental Health, need to be notified in the event of a spill or other contaminating event. Early notification allows NID to respond in a manner that will allow isolation of flows to protect our customer base, many of which utilize this water in home for incidental uses.

Preservation of Historic Storm Water Flow Volume in Wolf Creek

Agcy 10-12

NID exercises the discharge of water from our canal systems during emergency, or storm related events. Many of these natural channels join or cross through the Brunswick site. The ability to continue utilizing these channels to spill water into Wolf Creek shall be preserved and maintained at the levels of historic use. NID has discharge records up to

11 CFS into the head waters of the South Fork of Wolf Creek on the Southeast end of the Brunswick Site. The second spill channel intersects the Brunswick property near Bennet Road on the Northwest edge of the Brunswick site. Flows into Wolf Creek at this location have been recorded up to 35 CFS. NID requests that a mitigation measure be included to ensure the volume of Mine discharge water to Wolf Creek will not limit storm flow capacity during storm events.

Potable Water Connection to Mine

Agcy 10-13

Lastly, NID's Rules and Regulations require a reduced pressure backflow prevention device on all commercial or industrial connections to our treated water systems. This will require a retrofit of any existing connections prior operations at both the Brunswick and or Centennial sites. Installation of backflow prevention devices will protect the community drinking water system from an over pressuring event within the mines water system. These devices, and the costs of installing them will need to be paid for by the Applicant.

Again, thank you for providing a copy of the Notice of Preparation for the Idaho Maryland Mine. The District looks forward to working collaboratively with the County and Rise Grass Valley. If you have any questions or would like additional information, please contact me at (530)-271-6882.

Respectfully Submitted,

Armon "Chip" Close
Water Operations Manager

cc: Chris Bierwagen, NID Board President, Division II
Karen Hull, NID Board Vice President, Division III
Ricki Heck, NID Director, Division I
Laura Peters, NID Director, Division IV
Rich Johansen, NID Director, Division V
Jennifer Hanson, NID General Manager
File

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AGENCY LETTER 10: ARMON CLOSE, NEVADA IRRIGATION DISTRICT

Response to Comment Agcy 10-1

The Nevada Irrigation District (NID) commented that the proposed potable water line would need to interconnect with the existing NID water line in the Whispering Pines Lane area, requiring additional rights-of-way and easements for installation of infrastructure on parcels where easements/rights-of-way do not presently exist. NID asserts that the DEIR did not contemplate the required interconnections or easements; however, the DEIR does contemplate the need for these interconnections and easements/rights-of-way as discussed below.

The proposed water pipeline design interconnects with NID's existing water distribution system on Whispering Pines Road, as shown in Figures 3-2, 3-9, and 3-15 of the DEIR and described on page 3-36 of the DEIR.

Further, the applicant has submitted an easement agreement with the Use Permit application to allow the construction of the pipeline from E. Bennett Road to the Centennial site and grant easements to NID pursuant to NID standards.

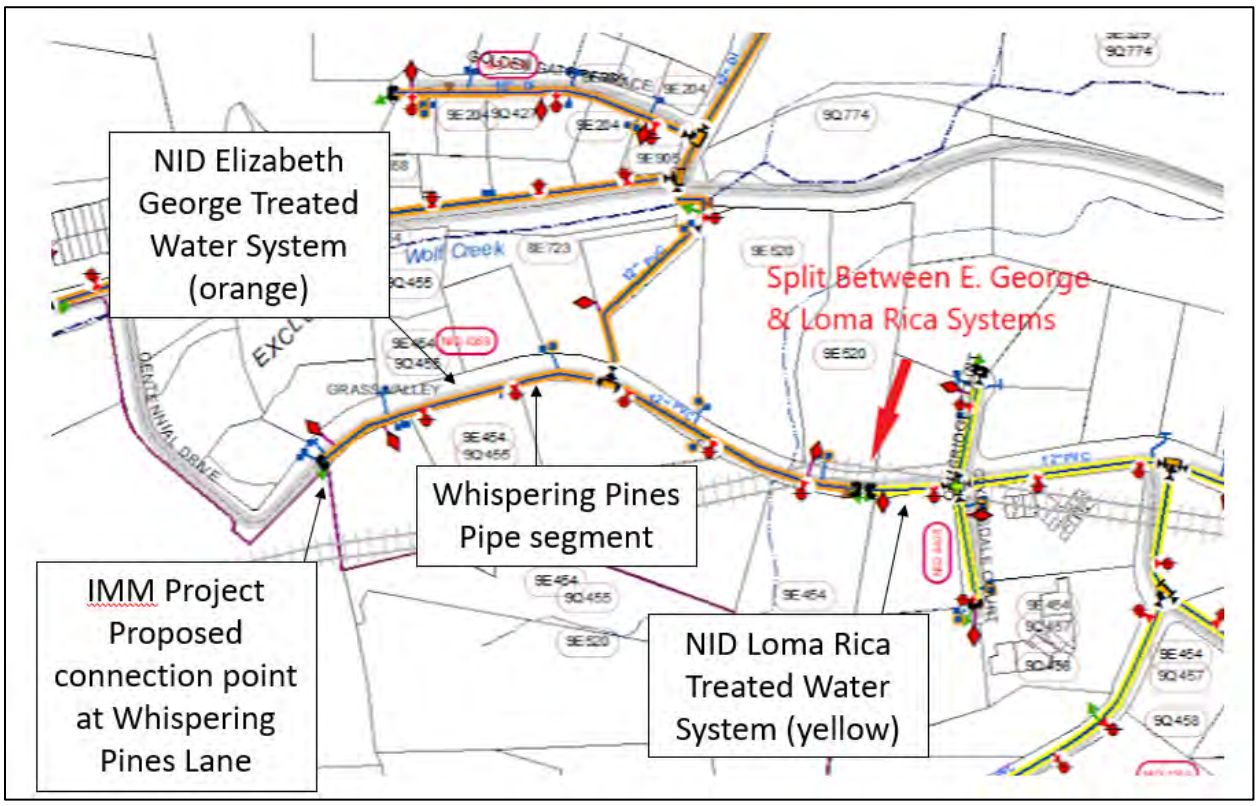
https://www.nevadacountyca.gov/DocumentCenter/View/33587/Rise-Willman-NID-Easement-Agreement---ADDED-392020

The applicant has submitted detailed drawings with the Use Permit application showing the pipeline route and property boundaries.

https://www.nevadacountyca.gov/DocumentCenter/View/33572/Pipeline-Easements-1---ADDED-392020

Additionally, the commenter specifically states that the DEIR does not contemplate the interconnection with NID system on Whispering Pines Lane near Clydesdale Court, which will require a short section of alignment within the right-of-way along Whispering Pines Lane. The commenter suggests that the connection will require the crossing of multiple parcels that do not contain an existing roadway/right-of-way; however, this is not correct. As shown in the figure below (based on map of NID pipeline system provided to applicant by NID) the Elizabeth George Treated Water System and Loma Rica Treated Water Systems have pipelines that are directly adjacent within the roadway and could be connected without obtaining any new right-of-way or easements and without new significant disturbance. This more feasible connection method would transfer customers on Whispering Pines Lane from the Elizabeth George system to the Loma Rica system in order to complete a closed circuit with the proposed water line extension for the project along E. Bennett Road.

Given that there are options to provide the connection discussed by NID without crossing the parcels as suggested, it would be speculative to assume crossing of other parcels is required. Further, while there are multiple technical methods that could be used to connect the water systems such as pressure balancing systems, the specific details regarding interconnection and balancing of pressures and allocation of water from different NID water treatment plant circuits is an engineering level detail and engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)



Mitigation Measure 4.8-2(c) of the DEIR is hereby revised to clarify these necessary interconnections and that all easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the applicant and conveyed to NID prior to acceptance of the new potable line, and the applicant will bear the associated costs.

4.8-2(c) *Prior to commencement of initial mine dewatering, the Project Applicant shall implement the Well Mitigation Plan (February 2, 2021, Rise Grass Valley, Inc.) by connecting 30 properties in the East Bennett area to the NID potable water system (see Figure 1 and Table 1 of the Well Mitigation Plan for specific property locations). The Project Applicant shall be responsible for fully funding the following for each property connection:*

1) *Engineering and Permitting <u>to NID and County standards</u>.*
2) *Construction of main water piping, <u>interconnecting the existing NID pipelines at E. Bennet Road and Whispering Pines Lane in accordance with NID standards and NID approved engineering design.</u>*
3) *Construction of service lateral piping <u>in accordance with NID standards and NID approved engineering design.</u>*
4) *Installation of water meters at property line <u>in accordance with NID standards and NID approved engineering design.</u>*
5) *Connection of water meters to house (If requested and authorized by property owner)*

6) *Closure of domestic water wells (If requested and authorized by property owner)*

7) *NID installation and capacity charges for a 5/8-inch meter connection.*

8) *Reimbursement for water charges, for monthly fixed service charges and use of up to 400 gallons per day, will continue until the sooner of the following occurs: 1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise. 2) The property is annexed into the City of Grass Valley.*

9) *Of the 30 properties, it is anticipated that only APN 009-600-012 is not eligible for water cost reimbursement as it is currently vacant. Existing NID customers will not be eligible for reimbursement of NID water charges and will be confirmed through consultation with NID during the design process.*

10) *All easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the applicant and conveyed to NID prior to acceptance of the new potable line.*

Proof of satisfaction of this measure shall be provided to Nevada County Environmental Health Department for each property identified in the Well Mitigation Plan.

The above changes to Mitigation Measure 4.8-2(c) of the DEIR are for clarification purposes, in response to NID's comments, and do not alter the analysis, nor the conclusions of the DEIR.

Response to Comment Agcy 10-2

The commenter states that the DEIR incorrectly requires the potable water pipeline to be constructed to County standards although NID has jurisdiction over the construction standards for the pipeline. However, page 3-36 of the DEIR discusses compliance with County guidelines for the purpose of standards applicable to disposing of asphalt and road paving, not the pipeline itself. Mitigation Measure 4.8-2(c) requires the connection to the NID potable water system, which would require engineering approval from NID and construction to the appropriate NID standards. As shown on the above response, the FEIR includes language clarifying that the potable water pipeline will be constructed to NID standards.

Response to Comment Agcy 10-3

The Well Mitigation Plan has been revised to include the installation of Double Check Valves. Please see Appendix D to this Final EIR for a revised Well Mitigation Plan. As described in the Well Mitigation Plan (Appendix K.9 of the DEIR), the applicant will close property owners' wells, using certified well drillers operating under Nevada County regulations, if well closure is requested by the landowner at the time of NID connection and service to their properties. If a property owner decides to retain and continue using their water well, the cost of the well's operation, including Double Check Valve monthly fees, would be the owner's responsible and not the applicant.

Response to Comment Agcy 10-4

The single-family home unit demand factor of 0.36 acre-feet per year per connection is used by NID for projecting demands. (Page 18 of the NID 2020 Urban Water Management Plan). This is equivalent to 321 gallons per day. The well mitigation plan proposes compensation of up to 400 gallons per day or approximately 25% more than NID's estimate of demand for a single-family

home. The water supply assessment uses a higher water consumption figure as a conservative measure to ensure adequate water supply; but this is not the appropriate figure to use for the Well Mitigation Plan.

Response to Comment Agcy 10-5

The commenter states that the applicant should be required to conduct an extensive and robust well and groundwater monitoring effort prior to and during dewatering and should guarantee potable water for any well impacted beyond the 30 wells that are proposed to be connected to NID water supply. A rigorous Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(b) requires that if, based on the GMP, it is determined that mining operations are resulting in a significant impact to any wells (including wells beyond the 30 wells included in the expected impact area), the Project Applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Agcy 10-6

The commenter states that the applicant should pay for water for any parcel connected to NID water supply for the life of the mine, even after the parcel is sold or annexed into the City of Grass Valley. The Well Mitigation Plan (Appendix K.9 of the DEIR) takes a conservative approach and presumes that an owner who decides to connect to the NID system has been impacted by and at the fault of the mining operation, even if no impact to groundwater well supply has occurred. As such, the Well Mitigation Plan was designed to be even more conservative than Nevada County General Plan Policy 17.12, which requires an impact as a prerequisite to the obligation to pay for water, which policy states “If it is determined that the operator is at fault, impacted owners shall be compensated by the operator.” A new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID’s water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City which allows water wells to be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

Response to Comment Agcy 10-7

The commenter states that the applicant should conduct advance sampling of water quality and production for the wells located in the Woodrose, Greenhorn and Beaver Lane areas to establish a baseline. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As discussed on page 4.8-66 of the DEIR, the GMP will select locations of the

monitoring wells in order to provide spatial coverage throughout the project and adjacent areas and include collection of water quality data. As discussed on pages 2-3 of the GMP (Appendix K.8 of the EIR), assessment of impacts of water-level changes in domestic wells is difficult to perform when examining each domestic well on an individual basis because of operational and depth considerations for each well. As noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells, including water level and quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Agcy 10-8

The commenter notes that the greenhouse gas emissions modelling for the project assumed that only 26 residences would be switched to NID water, while the Well Mitigation Plan requires up to 30 residences be connected to NID water. This discrepancy is due to the fact that four of the 30 properties along E. Bennett Road within the potential well impact area are already serviced by NID, as shown in Table 1 of the Well Mitigation Plan (Appendix K.9 of the DEIR). As four of the 30 parcels are already connected to NID water, no greenhouse gas emissions would be caused by the project for those four parcels. Indoor/outdoor water use for the homes along the potable water line and electricity intensity factors are based on California Emission Estimator Model (CalEEMod) defaults, as stated in the footnote on page 349 of Appendix E.1 of the EIR. An assumption of 26 dwellings for a total water demand of 2.76 million gallons (MG) of water per year results in average total water use of 291 gallons per day per dwelling. This is similar to the single-family home unit demand factor of 0.36 acre-feet per year (321 gallons per day) per connection used by NID for projecting demands. (Page 18 of the NID 2020 Urban Water Management Plan). The modelled GHG emissions for water supply to residences along E. Bennett Road are only 1.2 metric tons CO_2e per year. A change in assumptions as suggested by the commenter is not warranted because the four parcels are already connected to NID water supply, and further the change would result in only a trivial increase in GHG emissions not relevant to the impact analysis.

Response to Comment Agcy 10-9

The commenter states that the applicant should supply water to any wells that are impacted due to mine dewatering beyond the 30 parcels proposed for connection to NID water, and should also place monitoring wells near the Greenhorn, Woodrose and Beaver Lane areas. Further, the commenter requested that the monitoring well depth mirror the existing wells in the area. As discussed below, the applicant is required to replace water for any parcel that has significant impact to groundwater supply due to mine dewatering, and further, five monitoring well sites are planned in the vicinity of the Greenhorn, Woodrose, and Beaver Lane areas with shallow/deep well depths to capture water level fluctuations at all relevant depths.

A rigorous Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). The mitigation measure requires water-level monitoring data for a minimum of 12 months before commencement of dewatering of the mine. As described in Section 7.0 of the GMP (Appendix K.8 of the EIR), data loggers would collect water-level information once every 1 to 4 hours throughout the life of the project. As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(b) requires that if, based on the GMP, it is determined that mining operations are resulting in a significant impact to groundwater wells, the Project Applicant shall

be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted.

As described on page 4.8-66 of the DEIR the GMP will select locations of the monitoring wells in order to provide spatial coverage throughout the project and adjacent areas. As shown in Figure 1 of the GMP, five monitoring well sites are planned in the vicinity of the Greenhorn, Woodrose, and Beaver Lane areas. Section 4.0 of the GMP describes that each monitoring well location will consist of a shallow and a deep well installation. This "shallow/deep" pairing method is designed to assess changes in vertical water levels and gradients that may occur as the result of mining activities. Shallow monitoring wells will be installed to depths of approximately 100 ft, and deep monitoring wells will be installed to depths of approximately 300 ft. The exact installation depths will vary between each well pair and will be determined based on observed groundwater conditions during the field installation activities.

As noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells, including water level and quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Agcy 10-10

The commenter asserts that the applicant should be required to provide financial assurance of 14 million dollars to cover the cost of mitigating dewatering impacts in the Greenhorn, Woodrose and Beaver Lane areas. As discussed below, a bond for construction of water supply infrastructure in this area is not necessary because no significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, and Beaver areas. Moreover, the well monitoring program, required as mitigation for the project would provide early warning of any potential dewatering impacts to the Greenhorn, Woodrose and Beaver Lane areas, allowing the mine operator to provide replacement water prior to impacts, or to slow or halt dewatering to prevent any impact prior to water supply being connected.

The analysis provided in Section 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. Pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. No significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, and Beaver areas, as drawdown in these areas is not expected to result in a 10% or greater reduction in groundwater well column levels (See Sections 4.2.2.1, 4.2.2.2, and 4.2.2.3 of Appendix K.2 of the DEIR). The predictions include the use of a 100% safety factor, multiple sensitivity scenarios, and have been peer reviewed by the County's independent expert consultant. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). Please refer to Chapter 4 of this Final EIR, Mitigation Monitoring and Reporting Program, which includes a table containing all of the mitigation measures required in the DEIR. As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.



As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.

Mitigation Measure 4.8-2(a) requires that a projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. To provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the project requiring that monitoring of domestic water wells will be conducted upon request by property owners within or nearby the predicted 1-ft drawdown isopleth of the project (See Master Response 15 - Adequacy of Groundwater Monitoring & Mitigation).

If the water level impact assessment showed a potential impact to wells outside of the East Bennett area, assuming the 100% safety factor, the applicant would be required to mitigate this impact before it occurs in accordance with Mitigation Measure 4.8-2(b). The mitigation would be for properties which may be potentially impacted as determined in the projected water-level impact assessment. As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The 10% drawdown threshold of significance is extremely conservative and, in most cases, would not lower the water level below the casing of the domestic well. Therefore, well mitigation may not be required after inspection. If reduction of the water column was great enough to reduce the well's yield, a simple adjustment to the pumping system may only be required. For example, by pumping at a lessor rate over a longer duration and if necessary, installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service to a group of wells. Slowing or halting of mine dewatering could be done as necessary to allow enough time to complete mitigations. In the case of deepening a well this may be several weeks and would require a simple well construction permit from the Nevada County Environmental Health Department and the mobilization of a licensed contractor. Several months may be required in the case of connecting a group of wells to the NID system. NID recently completed the Loma Rica District Waterline Extension project in approximately 3 months, which involved the installation of 3,000 feet of 8-inch diameter treated waterline to 20 parcels. A notice of exemption from CEQA was filed on July 21, 2021. Construction commenced in early October 2021 and was completed and operations on December 10th, 2021. https://www.nidwater.com/loma-rica-district-financed-waterline-extension-project

The Well Mitigation Plan (Appendix D to this Final EIR) has been modified to clarify the actions that would be taken as described above.

In addition, as noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells, including water level and quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Agcy 10-11

The commenter requests real-time flow data for the discharge of water into South Fork Wolf Creek, via a publicly accessible webpage that shows one week of flow history. Additionally, NID requests one week of notice whenever a planned outage in treatment or other interruption to discharge flow is expected.

Pursuant to the commenter's request, the applicant will be required to provide one-week notice of any expected flow interruptions when feasible, and notice of any spill or contaminating event via a condition of approval. Additionally, the applicant will be required to provide NID access to real-time flow data of South Fork Wolf Creek directly downstream from the project's discharge, with 15-minute interval data, with a trend history of at least one week, per a condition of approval. The County will not require the flow data to be publicly available, but the data may be made publicly available at the applicant's or NID's discretion.

Response to Comment Agcy 10-12

The commenter requests that a mitigation measure be added to ensure the volume of mine discharge water to South Fork Wolf Creek will not limit storm flow capacity during storm events. and notes that historic flows through the Property have been up to 35 CFS. As discussed in Section 4.8-3 of the DEIR, the detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site.

Mitigation Measure 4.8-3 requires the applicant to submit a Final Drainage Report to the Nevada County Planning Department for review and approval. The Final Drainage Report shall demonstrate that the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed pre-development levels in the downstream channel(s) during the design storm events. As such, the DEIR already includes mitigation that ensures NID's ability to discharge water through the Property during storm events will not be limited; thus, no additional mitigation is required.

Response to Comment Agcy 10-13

Backflow prevention devices will be installed pursuant to NID rules (See Section 9 of Nevada Irrigation Water Service Regulations[7]) at the Brunswick and Centennial sites. Engineering details would be provided in the submittal of Improvement Plans to Nevada County, which require County review to ensure compliance with NID rules and County approval before commencement of construction.

[7]https://www.nidwater.com/files/53708aff0/2021+WATER+SERVICE+RULES+%26+REGS%2C+FULL+Document.pdf

Agency Letter 11

Northern Sierra Air Quality Management District

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April 29, 2022

Re: Revised Comments on Draft EIR for Idaho-Maryland Mine, Nevada County, CA

Introduction

Agcy 11-1 The Northern Sierra Air Quality Management District (NSAQMD) has been involved at various stages with the development of the environmental documentation for this proposed project. As a responsible agency under the California Environmental Quality Act, the NSAQMD neither supports nor opposes this project, and is submitting these comments in the interest of ensuring the adequacy of the DEIR. The NSAQMD recognizes that the commitment to use electric underground mobile equipment instead of diesel-powered equipment is a significant mitigation.

Asbestos Emissions

The Air Quality sections of the DEIR include a newly introduced concept of converting asbestos measurements to PCM (phase contrast microscopy) units.

Agcy 11-2 During the DEIR comment period the NSAQMD contacted OEHHA with questions about the asbestos PCM conversion process. OEHHA staff referred the NSAQMD to the California Air Resources Board's (CARB) Risk Analysis Section, which worked with CARB's Monitoring and Laboratory Division in providing an assessment of the underlying science. CARB staff concluded that "it is not appropriate to determine risk from rock samples" (personal communication with CARB staff, 3/28/22) and noted that the PCM conversion factor was developed for air monitoring samples, not rocks. For reference, the origin of the PCM conversion factor is EPA's Airborne Asbestos Health Assessment Update (EPA/600/8-84/003F, 1986). Since there is no approved method for calculating risk from rock samples, comparison with the NSAQMD's AB2588 toxics significance threshold based on rock composition carries some uncertainty.

Agcy 11-3 The DEIR is correct in observing that the Asbestos Airborne Toxic Control Measures (ATCMs) at CCR Title 17, Section 93105 and 93106 apply to the project. Underground mining is not covered in the ATCMs, but will be subject to permit conditions prescribed by the NSAQMD via the required Authority to Construct/Permit to Operate.

Agcy 11-4 Note that the footnote on page 55 reads, "Samples containing naturally-occurring asbestos were from underground rock only..." whereas November 2021 TEM sampling did discover asbestos in one of the two surface samples (#Y962843) from the 55-acre Centennial site.

1

Also, there appears to be at least one mistake in the TEM lab reports. The sheet for sample #Y962990 lists a "Calculated Asbestos Concentration (Weight %)" for chrysotile asbestos as .075%; there is an apparent laboratory error in reporting the total as <0.001 %.

Criteria Pollutant Emissions

Agcy 11-5 On page 304 of Appendix E.1, there are multiple tables that require explanation. The rationale for using a silt content of 1.6% for the crushed rock and a moisture content of 15% for the sand tailings should be discussed. The normal ranges noted in AP-42 section 13.2.4 are a silt content of 0.44% to 19% and a moisture content of 0.25% to 4.8%.

Agcy 11-6 Additional assumptions on document page 304 require explanation, including a wind erosion area of 0.72 acres, 0.34 acres of access road and 1.00 acre either seeded or with covering underway. Elsewhere in the DEIR, it appears that more surface is to be disturbed than the area indicated in these assumptions. Likewise, the assumptions for bulldozing and compaction (2.43 hrs/day and 1.02 hrs/day respectively) appear less than indicated elsewhere in the DEIR.

Agcy 11-7 The Logging and Chipping (described on page 4.3-56) is assumed to be for 24 total acres (Centennial and Brunswick sites combined). We see no mention of emissions associated with ongoing vegetation management.

Agcy 11-8 The beginning of the Earthwork and Material Handling section (App. E-1, p. 24) reads, "The barren rock will be transported from the concrete silo using a series of chutes and conveyors to a fully enclosed truck loading building." Each transfer point along the "series of chutes and conveyors" is an emission point which is not accounted for in the DEIR.

Agcy 11-9 Table 2 of the Health Risk Assessment lists the Base Elevation for the generators and diesel storage tanks in meters (placing them above 9,000'), whereas it should be feet. The calculations require verification to ensure that the modeling inputs are in the correct units.

Agcy 11-10 The footnote for table 8 on page 28 of E.1 says, "Concentrate truck trip distance of 145 miles is based on the distance between the project sites and the Port of Oakland." An explanation of why the ore concentrate is going to the Port of Oakland is necessary. If it is being transported to a refinery elsewhere, the associated emissions should be included in the GHG analysis since GHG emissions are a global concern.

Agcy 11-11 Unnumbered document page 184 of E.1 (for paved road fugitive emissions from vehicles) shows a table that has fractions of vehicles making fractions of trips, and then rounds the resulting VMT numbers before performing the final calculations. For instance, Freight Trucks have an average of 0.43 daily trips going 0.52 miles and lists their VMT as 0. The 0 miles travelled is then multiplied by the weight of the trucks, which yields 0 pounds. It also shows 1 concentrate truck trip per day, whereas in some places there are 10 concentrate trips/day and there are 5 concentrate truck trips listed on page 186 and 187. This is an example of how not only concentrate trucks but also other vehicles display different mileage, different trip numbers, etc. throughout the emissions calculations. These require standardization and accurate data conclusions.

Agcy 11-12	The emissions estimates assume that all on-site roads will be paved. This requires inclusion as a condition or mitigation measure.
Agcy 11-13	The spreading of 1,000 tons per day of engineered fill with a dozer require inclusion in the off-road equipment emissions (dozers are considered to be off-road equipment) data.
Agcy 11-14	App. E-1, document page 380/1938 lists 3 diesel generators that are proposed to operate 8 hours per day, 7 days per week in perpetuity (operational). The emissions from these generators require inclusion in the various emission quantification tables. Similarly, Table 4 (off-road construction emissions) of App. E.1, p. 21 includes 9 portable diesel generators operating 6 hours/day, 6 days/week that require inclusion in the emissions estimate data columns.
Agcy 11-15	Emissions from construction of the septic leach field and sewage line running up hill to the septic system require inclusion in the emissions analysis. Emissions from any backup diesel generator(s) required to pump sewage up the hill require inclusion in the emissions data.
Agcy 11-16	The OFFROAD model does not include fugitive emissions. It only includes engine emissions. The Operational Off-road Equipment list (App. E-1, document page 380/1938) lists off-road equipment at the Brunswick site. PM emissions from those require addition to the TAC calculations, which specify zero emissions from off-road equipment.
Agcy 11-17	The "Earthwork and Material Handling Fugitive Dust" section starting on page 300 includes limited construction activities that are anticipated (SF Creek Culvert Replacement, Pond Berm Repair, Service Shaft Collar and Building Pad). It assumes a serpentinite content in fill of 14.3%, with an asbestos content of 0.20%. A figure of 0.03% (which requires explanation) is derived from these numbers. There is a calculation of wind erosion that assumes a disturbed area of 4 acres. The resultant calculated fugitive dust emissions from wind erosion during construction is 0.41 tpy of PM10 and 0.02 tpy of PM2.5. The following unnumbered page (doc page 301) has an unlabeled table which indicates that only 40,150 tons of fill would be placed per year (versus the proposed 365,000 tpy). The content of the pages after that require clarification. For example, there is a sub-table called "Compaction" as part of the Fill Placement calculation series that notes a piece of equipment ("Cat563") that works for 0.06 hours (216 seconds) per day. On that same page is a bulldozer that moves 411.1 tons per hour and works 0.27 hours (16 minutes and 12 seconds) per day.
Agcy 11-18	The reason for selecting 25 meters as the plume height and width for all of the line volume sources in Table 2 starting on page 8 of Appendix B of Appendix E.1 require explanation.
Agcy 11-19	The DEIR cites AP-42, Ch. 13.3 as a source for blasting emissions information. ANFO is listed in that source as emitting 17 lbs./ton of NOx. At 0.93 tpd of ANFO, that calculates to 2.89 tons per year of NOx emissions from ANFO detonation. Nitrogen oxides are principally NO2, which is recognized as a non-carcinogenic TAC. These TAC emissions are excluded from the DEIR. The "Underground Blasting and Crushing" section (p. 4.3-56) assumes no TAC emissions from blasting.

Agcy 11-20

ASUR Plan

The NSAQMD will take the ASUR Plan into consideration while developing an Authority to Construct/Permit to Operate.

Sincerely,

Gretchen Bennitt

Gretchen Bennitt, APCO
Northern Sierra Air Quality Management District

AGENCY LETTER 11: GRETCHEN BENNITT, NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT

Response to Comment Agcy 11-1

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Response to Comment Agcy 11-2

The Northern Sierra Air Quality Management District (NSAQMD) has indicated that there is no approved method, and thus some uncertainty, regarding the estimation of asbestos risk based on rock samples. Based on this lack of methodology and associated uncertainty, compliance with the California Air Resources Board (CARB) Air Toxics Control Measures (ATCMs) for naturally occurring asbestos, including development of an Asbestos Dust Mitigation Plan (ADMP), is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos, which would result in a less than significant impact. However, based on public concern regarding asbestos exposure, and to provide the most information possible regarding potential health risk, the DEIR included quantitative analysis of asbestos risk based on a very conservative methodology (as described below and in Master Response 22 – Conservatism of Asbestos Assumptions).

The Health Risk Assessment for the project uses modeled air concentrations to estimate health risks from asbestos emissions based on the Office of Environmental Health Hazards Assessment's (OEHHA) *Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments* (2015) (OEHHA Guidelines). The modeling of asbestos air emissions from operations (such as blasting, rock handling, and grading) is done in the same manner as other toxic air contaminants (TAC) contained in rock (such as metals or silica) but uses the appropriate base units of TAC content required for asbestos (TEM asbestos structures). The modeling performed for the Health Risk Assessment was generally completed as follows:

1. Dust emission rates (PM_{10}) from various project activities were estimated
2. Dust concentrations were modeled at locations surrounding the project using air dispersion modelling
3. The asbestos content of dust was estimated using the most conservative approach, using the maximum content of asbestos structures in rock and sand tailings and assuming all asbestos structures are liberated from dust particles. This is a very conservative assumption. Please see also Master Response 22 – Conservatism of Asbestos Assumptions
4. The health risk at receptor locations was estimated based on the modeled concentration of airborne asbestos fibers in accordance with the OEHHA Guidelines.

The base unit for asbestos content in rock is TEM structures per unit mass. The model accounts for the liberation of the asbestos TEM structures into the air though dust creation and dispersion. The TEM structures then must be converted to equivalent PCM fibers in order to calculate the health risk at a receptor location. The OEHHA Guidelines provide a conversion factor to convert PCM fibers to mass (0.003 µg = 100 asbestos fibers PCM). The use of PCM equivalent weight percent is for convenience in modeling because all other TACs are modeled in weight percent and asbestos is reported in units of pounds per year under the Air Toxics Hot Spots Program (OEHHA 2015 Appendix C). PCM equivalent weight percent of rock are interchangeable with TEM structures per unit mass and have no effect on the modeled health risk for asbestos.

As stated on page 4.3-42 of the EIR, the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA are consistent with what are used for the AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concluded that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concluded that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and required mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring to ensure that project asbestos emissions meet all applicable standards.

Response to Comment Agcy 11-3

The NSAQMD confirmed that the DEIR was correct that the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations and ATCM for Surfacing will apply to the project. Comment noted. Notably, the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations defines a Quarry as a facility or operation that obtains stone from the earth by means of cutting, digging, excavating, or blasting. Underground mining would be captured under this broad definition.

Response to Comment Agcy 11-4

The NSAQMD noted that the footnote on page 55 had an error in it. Therefore, footnote 41 has been deleted and the body text on page 4.3-80 of the EIR has been revised as follows (additions in underline, deletions in ~~strike-out~~):

> Because asbestos was found to be present in some of the ~~underground mining~~ material samples that Rise Grass Valley Inc. sent for laboratory analysis,~~[41]~~ an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.
>
> ~~41. Samples containing naturally-occurring asbestos were from underground rock only; naturally-occurring asbestosis not known to outcrop at the surface of the Brunswick Indutrial Site or Centennial Industrial Site.~~

The error in the TEM lab report is also noted. This error does not affect the analysis of asbestos emissions from the project, as the correct value was used in the analysis.

Response to Comment Agcy 11-5

The silt content for crushed barren rock was assumed at 1.6% based on EPA AP-42 Table 13.2.4-1 mean value for crushed limestone for the stone quarrying and processing industry. Other values presented in this table are from iron and steel production, taconite mining, and coal mining. The

stone quarrying industry is most similar to the proposed project's production of barren rock and therefore the selection of this silt content is appropriate.

A moisture content of 15% was assumed for sand tailings based on the estimated moisture content of sand tailings after dewatering by filter press. Typical moisture in filter cake for mineral tailings for pressure filters would range from 15% to 20% (Please see Table 6.43 of Metso Mineral Processing Handbook Edition 12)[8]. Therefore, the use of 15% is the most conservative assumption for estimating fugitive dust emissions, as a higher moisture content assumption would reduce the fugitive dust generation.

Response to Comment Agcy 11-6

The commenter questions the disturbance area assumptions used in the air quality model. The area worked was determined from an assumed compacted lift thickness and fill density provided by NV5 in the geotechnical reports for the project. The resulting tonnage of a single 0.5-foot (6 inch) lift is calculated at 1,388 tons per acre. At the daily tonnage of 1,000 tons per day this would equal an area worked of 0.72 acres per day. For conservatism, it was assumed that only a single lift would be placed in a day and the entire area exposed to wind erosion. In reality, multiple lifts might be placed during a day with a smaller overall exposed surface area. The 0.34-acre area of the access road is assumed from a road length of 1,000 feet and a road width of 15 feet, which is a conservative assumption of road length based on the expected project site configuration.

Bulldozing and compaction productivity were estimated from the Caterpillar Performance Handbook.[9] The compacted thickness of lift and number of compaction passes are provided by NV5 in the geotechnical reports for the project. The hours of bulldozing and compaction were more refined in the fugitive dust analysis in order to accurately estimate the fugitive dust generated from placement and compaction or engineered fill, but do not underestimate the likely work hours for these activities. Of note, the air quality analysis assumes a greater amount of operating hours per day for the calculation of exhaust criteria air pollutants and diesel particulate matter, and therefore exhaust emissions from bulldozers and compactors are overstated in the DEIR. This conservatism in exhaust emissions does not affect the analysis or conclusion of the DEIR.

Response to Comment Agcy 11-7

The logging and chipping would remove existing forest vegetation where engineered fill is proposed to be placed. The emissions from the logging and chipping activities were included in the air quality emissions analysis. The slopes of the fill pile will be seeded with grass and this grass would be cut periodically (to 4-inch height as stated on page 4.13-20 of the DEIR). However, any emissions from grass mowing would be negligible and would not change the results of the analysis.

Response to Comment Agcy 11-8

The emissions associated with the transfer points along the series of chutes and conveyors are presented in the second to last row of the table "Underground Mining – Stationary" on page 294 of Appendix E.1 labelled "Transfer to 500 ton barren rock silo" and the first two rows of the table "Ore Processing – Surface" on page 195 of Appendix E.1 labelled "Transfer to conveyor" and "Transfer to haul trucks".

[8] Metso:Outetec Basics in Mineral Processing, Edition 12, available at: https://www.mogroup.com/insights/e-books/basics-in-minerals-processing-handbook/
[9] Caterpillar Performance Handbook 48, available at: https://wheelercat.com/wp-content/uploads/2018/07/SEBD0351_ED48.pdf

Response to Comment Agcy 11-9

The base elevation for the generators (STCK8) and diesel storage tanks (STCK9 and STCK10) in Table 2 of the Health Risk Assessment are shown in feet, but the unit notation is in meters. This notation is a typographical error in the table. The correct elevation for these sources was used in the model as confirmed on page 395 of Appendix E.1, with the elevation of these sources noted at 837.71 meters, 838.73 meters, and 759.39 meters.

Response to Comment Agcy 11-10

The Port of Oakland is the principal ocean gateway for international containerized cargo shipments in Northern California. The Union Pacific and BNSF railroad facilities are located adjacent to the marine terminal area. Gold concentrate would be purchased by third parties and loaded into containers for shipment overseas or by rail to destinations in North America. Alternatively, the material could be trucked to Nevada State where processing facilities owned by third parties exist. However, the distance to the Nevada State border from the project site of approximately 90 miles is less than the distance to the Port of Oakland of 145 miles, so the Port was selected to provide a more conservative estimate of emissions.

The commentator suggests that GHG emissions associated with the international or interstate shipment of concentrates should have been included in the DEIR. This transport would be considered part of a lifecycle analysis. The California Natural Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions, found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). The gold concentrates produced by the project would be purchased by a third party and refined at a location that is not known and not in the control of the project. Calculation of GHG emissions from third party transport of gold concentrate would be speculative and therefore not required under CEQA. Please see also Master Response 26 – Lifecycle GHG Emissions.

Response to Comment Agcy 11-11

The purpose of the table on page 184 of Appendix E.1 is to calculate the weighted average vehicle weights of equipment and trucks along on-site paved roads only. Thus, the VMT values in question only pertain to on-site travel and do not factor into the off-site assumptions, which seems to be the distinction that the commenter was unclear about. A different calculation was used for off-site vehicle travel, which resulted in the difference in assumptions identified by the commenter. This on-site only estimate was used to determine the pounds per VMT for fugitive dust entrainment along paved roads based on the project-specific vehicle mix, which resulted in a more conservative value for particulate emission factors (since the majority of vehicles on-site are heavy trucks and equipment) than for off-site roadways, which have passenger vehicles as the primary proportion in the vehicle mix.

In addition, the table in question depicts only whole numbers for the “Total Vehicle Miles Traveled”, so values less than 1 are not shown. However, the equations do factor in the fractional “Total Miles Traveled” for the various trucks. For instance, although the table shows “0” total VMT for Freight Trucks, the equation of “Average Daily Trips” multiplied by “Total Distance (miles)” resulted in the following: 0.43 * 0.52 = 0.22 total VMT on-site, which was factored into the estimate of the weighted average on-site vehicle weights, and thus the pounds of particulate matter per VMT emission factor. The same table with the increased decimal places for “Total Vehicle Miles Traveled” is shown below for clarification:

Vehicle	Average Daily Trips	Total Distance (miles)	Total Vehicle Miles Traveled	Weight (tons)
Haul Trucks	50	0.59	29.50	20.8
Freight Trucks	0.43	0.52	0.22	27.5
Concentrate Trucks	1.0	0.52	0.52	27.5
Explosives Trucks	0.14	0.52	0.07	27.5
Fuel Trucks	0.15	0.52	0.08	27.5
Cement Trucks	1.28	0.52	0.66	27.5
Outside Services (light vehicles)	3.0	0.52	1.54	12.5
Light Trucks	80	0.52	41.21	3.45
Employee Vehicles	325	0.12	38.18	2.25
Forklifts			60.00	5
Wheel Loader	150	0.05	7.39	33
Weighted Average			**179.37**	**8.1**

Response to Comment Agcy 11-12

The paving of all on-site roads in included in the Project Description and therefore a condition of approval or mitigation measure is not required. Please see Figure 3.8 of the EIR. Nonetheless, the air quality analysis did conservatively include some dust emissions from unpaved access roads, even though the roads are proposed to be paved. Please see also page 303 of the Appendix E.1.

Response to Comment Agcy 11-13

The commenter states that a dozer is needed in the analysis to account for the spreading of engineered fill. Notably, a dozer is already included in the off-road equipment list and the associated emissions are included in the criteria air pollutant, TAC, and GHG inventories of the DEIR. Please see page 131 of Appendix E.1, which identifies a dozer for fill placement at the Centennial and Brunswick Sites.

Response to Comment Agcy 11-14

Portable generators/welders are included in the off-road equipment lists for construction and operations and the associated emissions are included in the criteria air pollutant, TAC, and GHG inventories of the DEIR. Please see pages 131 through 135 of Appendix E.1, which identifies the pieces of equipment assumed for the various phases of project construction and operations.

Response to Comment Agcy 11-15

Emissions from the construction of the septic leach field and sewage pipe is included in the grading and paving phase of the construction emissions in Appendix E.1 of the DEIR. The electricity demand for sewage treatment and pumping is included in the estimated electrical power consumption under the category “Water Treatment” on page 347 of Appendix E.1. As stated on page 4.3-104 of the DEIR, the use of backup generators during power outages is speculative and therefore the emissions for back-up power generators during outages are not included in the emissions estimates.

Response to Comment Agcy 11-16

The PM_{10} emissions from various off-road equipment in the OFFROAD model are used as a surrogate for diesel particulate matter (DPM) exhaust and are already incorporated into the Health Risk Assessment, as identified in Table 10 (“Off-Road Equipment” rows, “DPM” column) on page

386 of Appendix E.1. TACs in fugitive dust (PM_{10}) are not included in the OFFROAD model emission factors. TACs in fugitive dust (asbestos, silica, and metals) are included in the Health Risk Assessment and the assumptions discussed on 21-23 of the Health Risk Assessment.

Response to Comment Agcy 11-17

The pages that the commenter referred to are for the grading during construction of the project (Year 2021) and not for the operations. The 40,150 tons of fill being moved is the historic fill that is currently on the Brunswick site. This material would be excavated, moved, and compacted on the site in order to create the planned site grading.

Bulldozing and compaction productivity were estimated from the Caterpillar Performance Handbook. The compacted thickness of lift and number of compaction passes are provided by NV5 in the geotechnical reports for the project. As shown on page 301 of Appendix E.1, bulldozing and compaction are assumed to average 110 tons per day. Given the small daily production and high productivity, the average hours per day are 0.27 hours per day bulldozing and 0.06 hours per day compaction. The disturbed area of 4 acres is the assumption of the maximum area of the site that would be actively graded at one time. As grading of areas is completed, the concrete foundations of buildings and asphalt paving would be completed which limits the area of disturbance exposed to wind erosion.

A Phase I-II Environmental Site Assessment (ESA) was conducted at the Brunswick site (Appendix J of the DEIR). There is currently historic mine fill on the site, some of which will be moved during site construction. Eight of fourteen trenches in the mine waste noted some serpentinite in the geological logs. A conservative assumption was made that 25% of the material in the trenches is composed of serpentinite. Therefore, a serpentinite content of 14% was assumed (8 ÷ 14 x 25%). Five of the trenches were tested for asbestos in previous environmental studies as described in the ESA. Three samples were determined to have no asbestos and two samples were determined to have asbestos but below the detection limit of 1%. Therefore, an asbestos content of 0.2% was assumed for serpentinite (Average of 3 samples with no asbestos and 2 samples at half detection limit). No conversion to PCM equivalent was made for the assumed asbestos in construction grading for the Health Risk Assessment. These asbestos assumptions are conservative and likely overstate the health risk during construction grading. Even with this conservatism, the Health Risk Assessment prepared for the project concluded that the health risk to the most sensitive receptor will be below the applicable cancer and non-cancer risk thresholds. Nevertheless, the DEIR concluded that the project would result in a potentially significant impact with respect to exposing receptors to substantial concentrations of asbestos and required mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the EIR requires the submission of an ADMP to the NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring to ensure compliance with all applicable standards.

Response to Comment Agcy 11-18

This comment requests clarification on the source parameters in Table 2 of Appendix B of Appendix E.1. All references for the source parameters provided in Table 2 are shown in the footnote of that table as well as Section 7, References of the cited document. The NSAQMD does not have published guidance for air dispersion modeling. As such, nearby jurisdictions were evaluated for similar guidance to use for modeling. The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the closest air district to the NSAQMD with applicable dispersion modeling guidance. In Section 2.2 of the SMAQMD Dispersion Modeling of

Construction Generated PM_{10} Emissions document, emissions from exhaust should be modeled as volume sources with a release height of 5.0 meters and the lateral length in both directions being equal. The guidance also states that at least 50% of the project site area should be covered by the volume sources. The guidance omits any discussion on size of the lateral length of the volume sources. As such, Dudek consulted with various air districts throughout the State regarding the lateral dimension for volume sources. No published air district guidance in the State recommended a volume source lateral dimension. When discussing this issue with various air districts, the consensus was to have a volume source no greater than 25 meters in any direction when covering a site.

Response to Comment Agcy 11-19

The commenter asserts that blasting emissions, in particular nitrogen oxides, were not included in the DEIR's analysis; however, these emissions were included in the analysis of criteria air pollutants. NOx is a criteria air pollutant and has been analyzed as such. As discussed on page 4.3-41 of the EIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. NO_2 only has an acute reference exposure level, so no cancer or chronic non-cancer health effects are associated with exposure. To account for NOx in the health risk estimates, the assessment was rerun to include NO_2 and the resultant acute non-cancer health impacts of the project increased from 0.004 to 0.1, which is far below the significance threshold of 1. Please see Dudek Health Risk Assessment Memorandum for the Idaho-Maryland Mine Project – Hexavalent Chromium and Nitrogen Dioxide attached to the Final EIR. Therefore, there would be no change to the less than significant impact conclusion from the DEIR with respect to health risk.

Response to Comment Agcy 11-20

The County acknowledges the comment and notes that it does not raise new or additional environmental issues concerning the adequacy of the DEIR. Comment noted.

Agency Letter 12

Northern Sierra Air Quality Management District

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April 4, 2022

Re: Comments on Draft EIR for Idaho-Maryland Mine, Nevada County, CA

Introduction

Agcy 12-1

The NSAQMD submitted comments and recommendations regarding the proposed project as part of the NOA/NOP, but these were omitted from the DEIR's NOP comment section.

The NSAQMD recommended that the applicant work with the Department of Toxic Substances Control, the US Geological Survey and/or the Office of Environmental Health Hazard Assessment to obtain concurrence that asbestos testing for the proposed mine is adequately addressed with regard to the number and locations of samples and applicable analytical techniques. It does not appear as if this was done.

The NSAQMD has also submitted additional comments and been involved in other ways with the environmental documentation process for the proposed project. Many of the NSAQMD's comments and observations have been addressed, but some important ones remain unaddressed. Notably, the DEIR includes a newly added, previously undiscussed method of converting asbestos in rocks to asbestos in air that is not backed by science.

Asbestos emissions are the primary concern of the Northern Sierra Air Quality Management District (NSAQMD). The DEIR's treatment of naturally occurring asbestos is scientifically unsound and therefore not adequate for CEQA purposes. Laboratory testing in November 2021 of seven dominant types of rock from the site discovered asbestos in every type, with an average of 594,625,000 asbestos fibers per gram. For perspective, a new penny weighs 2.5 grams. Based on the recent tests of 40 rock samples and 2 previous rock samples, in a penny's mass of average mine rock there are well over a billion asbestos fibers.

Asbestos and Public Health

Asbestos is a well-known carcinogenic toxic air contaminant. Effects of asbestos exposure are insidious, highly variable and may not show up for 10 to 40 years or more. The most infamous result of asbestos exposure is mesothelioma, a specific type of cancer. The Office of Environmental Health Hazard Assessment (OEHHA) approach to asbestos risk assessment under AB2588 (the Air Toxics Hot Spots Act) is currently based only on a person's risk of developing mesothelioma. It does not provide any assessment of risk of developing other types of asbestos-related diseases such as asbestosis (an inflammatory condition affecting the lungs that can cause shortness of breath, coughing, and permanent lung damage), pleural

plaques (changes in the membranes surrounding the lung), pleural thickening, benign pleural effusions (abnormal collections of fluid between the thin layers of tissue lining the lungs and the wall of the chest cavity) and assorted cancers of the lung, larynx, pharynx, stomach, colorectum and ovary.

For additional information on the effects of asbestos exposure, see the National Cancer Institute website (https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet). Following is a relevant excerpt from this website:

*There is some evidence that family members of workers heavily exposed to asbestos face an increased risk of developing mesothelioma (https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet#r12). This risk is thought to result from exposure to asbestos fibers brought into the home on the shoes, clothing, skin, and hair of workers. To decrease these exposures, Federal law regulates workplace practices to limit the possibility of asbestos being brought home in this way. Some employees may be required to shower and change their clothes before they leave work, store their street clothes in a separate area of the workplace, or wash their work clothes at home separately from other clothes (*https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet#r2*).*

Cases of mesothelioma have also been seen in individuals without occupational asbestos exposure who live close to asbestos mines ((https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet#r12)).

Asbestos PCM Conversion

The Air Quality sections of the DEIR include a newly introduced concept of converting asbestos measurements to PCM (phase contrast microscopy) units. There is no accepted method to convert between rock samples and air samples. The DEIR's approach of translating asbestos discovered in solid rock samples into PCM fiber concentrations in air is not possible. The PCM concept is from Appendix C: Asbestos Conversion Factors & Cancer Potency Factor, which is part of OEHHA's February 2015 Air Toxics Hot Spots Program Guidance Manual. OEHHA's conversion from fiber counts to mass as PCM fibers was developed exclusively for air samples. This is made clear in EPA's Airborne Asbestos Health Assessment Update document (USEPA, 1986. Airborne Asbestos Health Assessment Update. EPA/600/8-84/003F, Office of Health and Environmental Assessment, Washington, DC), which is referenced in OEHHA's Air Toxics Hot Spots Program Guidance Manual, Appendix C: Asbestos Conversion Factors & Cancer Potency Factor.

None of the DEIR's discussions regarding PCM conversions are valid. PCM cannot be used as a reporting metric, a compliance verification mechanism or a replacement for other methods of asbestos investigation. PCM asbestos conversion is not a concept that applies outside the world of asbestos air monitoring. During the DEIR comment period the NSAQMD contacted OEHHA with questions about the PCM conversion. OEHHA referred the NSAQMD to the California Air Resources Board (CARB) Risk Analysis Section, which worked with CARB's

Monitoring and Laboratory Division in providing an assessment of the underlying science. In short, CARB confirmed the non-validity of the applicant's PCM conversion approach. Following is an excerpt from a 3/28/22 email from CARB's Risk Analysis Section:

I … wanted to clarify our earlier statement from our previous email regarding the risk calculations based on the lab reports, we initially attempted to convert TEMs into concentration in the air per the OEHHA guidance and ran it through HARP, but after discussing the outcome with others internally, it really isn't an appropriate way to calculate the risk (this was confirmed below with our MLD staff as well). Rather, you would need an annual average concentration from either sampled or modeled air concentrations, so our initial analysis no longer applies.

Staff from our Monitoring and Laboratory Division observed the following:

1. Determination of Risk from Rock Samples. *I agree with you, it is not appropriate to determine risk from rock samples. The asbestos fibers considered in Appendix C of the Hot Spots Guidance came from airborne samples during occupational exposure studies. I checked the 1986 U.S. EPA reference….*

The PLM and TEM analyses in this DEIR were done on bulk samples (rocks), and the asbestos concentrations are reported in weight percent. It is not known how many asbestos fibers can be generated (and become airborne) from a given mass of asbestos-containing rock material. So there is no known conversion factor for the asbestos weight % (by TEM analysis of a rock sample) that can be used to estimate the number of PCM fibers/m^3 applicable for the Hot Spots risk assessment equation.

2. Calculation of asbestos weight % in TEM analysis report. *[This is in response to a separate question from the NSAQMD] The total asbestos weight % should be the sum of the chrysotile and amphibole asbestos weight percent. For sample **Y962990** (attached) it appears that there is an error in the report. Only 1 chrysotile fiber ≥5 µm is reported, and yet the weight % is 0.075. Comments describe actinolite fibers detected (an amphibole asbestos). Strange that a total weight % of <0.001 is reported.*

*For sample **Y962999** … I did not detect an anomaly in the TEM report. Chrysotile fibers can be much smaller and thinner than amphibole asbestos fibers. Many chrysotile fibers detected do not amount to much weight because they are so small or thin. CARB M435 PLM analysis of this sample is 2.5% asbestos by point-count. This is not unusual either. PLM analysis uses ~100,000 times more mass of sample than TEM analysis. It is best to start with PLM, and follow up with TEM for the PLM non-detects. TEM can miss out on finding the asbestos because the TEM sample mass is so low.*

3. DEIR asbestos calculations (Appendix C). *For Appendix C (attached) there were no equations given on how TEM structures per nanogram and PCM asbestos weight percent were calculated in the first table that groups asbestos test results by rock type. In the next table, on the second and third pages (pages 56 and 57), there is a missing column for TEM weight % from the analyses.*

4. Geological Units and Asbestos Testing (page 9). *The equations that [were] used for calculations of asbestos structures per nanogram and PCM asbestos by weight are not given. It is difficult to follow the discussion in this section because the lithology of the rock units is not described, and neither are the rock sample groupings clearly identified in Appendix C.*

NSAQMD recommends that the notion of PCM conversion should be thrown out because using OEHHA's air sampling PCM conversion formula for rock samples has the effect of making it look like there is less asbestos present than TEM laboratory work has demonstrated to be the case. Instead, the project's risk should be evaluated based on many more samples being gathered, and evaluated using TEM asbestos by weight. Those samples should be gathered in an approved, standardized manner (such as is set forth in Method 435) that employs composite collection practices rather than hand-picked pieces of core samples (which the tested samples were).

Using TEM to look at the same old core samples that were previously analyzed with PLM does have some value because we can now see how much asbestos the PLM method missed. PLM only detected asbestos in 2 of the 40 core samples, but the TEM method detected asbestos in 17 of the 40 samples, including in every rock type evaluated.

Both chrysotile and amphibole asbestos were discovered in the core samples. Chrysotile fibers tend to be smaller than amphibole fibers, making them more likely to become airborne and be transported great distances in the wind. Depending on weather conditions, they could be inhaled or deposited on surfaces in all parts of Nevada County for the 80-year duration of the project.

Note that the footnote on page 55 reads, "Samples containing naturally-occurring asbestos were from underground rock only; naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Site or Centennial Site." This is not the case – it could be that this was mistakenly left in the document from a version written before TEM was employed to get a closer look at the samples. While only 2 grab samples were taken from the surface of the 55-acre Centennial site, one of the two was found to contain 30-million chrysotile asbestos fibers per gram of rock, as is listed in the lab report for Sample Y962843 (ASUR Plan, unnumbered document page 106/131).

It is difficult to find the Health Risk Assessment among the many pages of the DEIR. It begins on unnumbered document page 356 of 1938 of Appendix E.1, as Appendix B of Appendix E.1. It should be noted that Appendix B of Appendix B of Appendix E.1, titled "Fugitive Dust TAC Concentrations" (starting on page 1,901 of the document) is missing asbestos. The Health Risk Assessment should be easier to locate.

The HARP report lists the maximum mitigated cancer risk as 3.34e-5 (group 543, p. 1839 of 1938) while the Appendix B, p. 1 reports the maximum cancer risk as 1.04e-5 (= 10.4e-6).

Asbestos Sampling and Monitoring

The NSAQMD has recommended that additional rock sampling be performed, and performed in a representative manner using composite samples, but it appears that no further sampling has been done (only further investigation of previously collected samples). There are still only 2 samples from the 56-acre Centennial site. All of the samples analyzed using TEM were previously analyzed using the inferior PLM method. The difference in the results from the two methods is large. PLM only detected asbestos in 2 of the 40 samples, but the TEM method detected asbestos in 17 of the 40 samples. This is mainly because PLM cannot detect small asbestos fibers, which are more easily entrained in the wind, can travel farther, and are inhaled deeper into the lungs.

It is unclear why the two serpentine samples originally evaluated using TEM were discarded from the 40-sample statistics and from consideration for the Health Risk Assessment. There were 42 samples analyzed using TEM, not 40. The two that were excluded are especially rich in asbestos. If all 42 samples are considered, the average asbestos concentration is 0.24% by weight.

In September 2020, the NSAQMD and Dudek communicated about monitoring. It would be ideal to have baseline monitoring data for at least a year before the project starts up. The NSAQMD suggested including a publicly accessible webcam (one for each site preferably) in the monitoring plan, as well as a MET site and a rain gauge. Monitoring specifics set forth in the Construction ATCM are available at CCR 93105(h)(3) and (h)(4). 40 CFR Part 58 (especially Appendix E) also contains relevant monitoring specifics.

Asbestos Emissions

Table 5 (App. E.1, document page 378/1938) lists construction emissions of .00003 tpy of asbestos, which is 0.06 lbs/year. This is incorrect. If we add the obvious dust from mitigated PM10 construction emissions due to off-road equipment (0.6 lbs/day) to the fugitive dust emissions (8.30 lbs/day) we get 8.9 lbs/day, or 3,248.5 lbs/year. TEM laboratory testing of 42 samples from the site yielded an average of 0.236355% asbestos content by weight. .236355 / 100 x 3,248.5 lbs/yr = 7.68 lbs/year, or 128 times the quantity of asbestos emissions presented in Table 5.

Dust emissions for the following 10 years are estimated at lbs/day from underground blasting (1.61) + ore processing (0.29) + fugitives (39.05) = 40.95 lbs/day, or 14,946.75 lbs/year. This comes to 35.33 lbs/year of asbestos emissions.

There is an Engineered Fill placement emissions table on unnumbered document page 303 that lists 37.95 lbs/day of PM emissions. The asbestos emission calculations are based not on the amount of asbestos present in the rock, but on the ASUR plan's goal of 0.01% asbestos in the engineered fill. The table at the top of the page includes emission factors. For the dumping of dump trucks, it includes emission factors for "material drop" from AP42, Table 13.2.4. The "material drop" emission factor is not for "material handling – blending." "Blending" implies disturbance that is continuous for some amount of time, whereas a material

drop is more or less instantaneous. The emission factor assumptions for the use of AP-42 section 13.2.4 should be explained. A material drop emission factor of 0.0001 lb/ton is used in the DEIR. However, the equation in 13.2.4 for material drop yields more than 6 times that amount if we apply a reasonable 5 mph wind speed and 3% moisture content.

Emissions Estimate Assumptions

On page 304, there are a few tables that are not explained. The rationale for using a silt content of 1.6% for the crushed rock and a moisture content of 15% for the sand tailings should be discussed. The normal ranges noted in AP-42 section 13.2.4 are a silt content of 0.44% to 19% and a moisture content of 0.25% to 4.8%. The choices taken in the DEIR for silt and moisture content result in lower emissions than the average anticipated values. Particularly since the waste rock has been crushed finely (beyond normal aggregate processing), the fill would have an increased concentration of fine particles/dust.

Additional assumptions on document page 304 that are questionable include a wind erosion area of 0.72 acres of active compaction, 0.34 acres access road and 1.00 acres either seeded or with covering underway. Elsewhere in the DEIR, it appears that more surface is to be disturbed that the area indicated in the assumptions on page 304. Likewise, the assumptions for bulldozing and compaction (2.43 hrs/day and 1.02 hrs/day respectively) seem to be less than indicated elsewhere in the DEIR.

The Logging and Chipping (described on page 4.3-56) is assumed to be for only 24 acres (Centennial and Brunswick sites combined). This is expected to take 11 years, so the assumptions divide 24 acres by 11 years to arrive at 2.18 acres per year, and it is assumed that logging and chipping will occur on only 1 day per year. It would be more realistic to consider that more than 2.18 acres might be cleared in a given year. Also, there is no mention of emissions associated with ongoing vegetation management.

Document page 306 contains logging & chipping emissions. There should be a source listed for the emission estimates. It is impossible to tell if the emissions are only from the equipment engines, engines plus tires, or engines, tires, root balls, fugitives from fans and loading limbs into the chipper, and so forth. Without an explanation there is no way to assess the validity of the numbers. From the tables on pages 307 and 308, it appears that those logging and chipping emissions listed on page 306 are only from the engines (which would be far less than if the entire process was evaluated). Following the chipping and logging estimates is a table that represents mobile sources associated with logging and chipping. However, it assumes that all operation is on paved roads and none of the vehicles are operating off-road, and only includes emissions directly from the vehicles (no fugitives). The emissions are based on EMFAC, which does not consider emissions from tires, fans and air displacement as vehicles navigate off-road to collect chips and logs.

The beginning of the Earthwork and Material Handling section (App. E-1, p. 24) reads, "Barren rock hoisted from the Brunswick shaft will be placed in the existing concrete silo located at the Brunswick Industrial Site. The barren rock will be transported from the concrete silo using a series of chutes and conveyors to a fully enclosed truck loading building. Barren rock may be



mixed with sands from the ore processing plant to create an engineered fill that meets appropriate geotechnical specifications for construction of development pads. Engineered fill would be transported from the ore processing facility to a receiving site, where it would be spread using a dozer."

Each transfer point along the "series of chutes and conveyors" is an emission point which is not accounted for in the DEIR.

Table 2 of the Health Risk Assessment lists the Base Elevation for the generators and diesel storage tanks in meters (placing them above 9,000'), whereas it should be feet.

The footnote for table 8 on page 28 of E.1 says, "Concentrate truck trip distance of 145 miles is based on the distance between the project sites and the Port of Oakland." There should be an explanation of why the 20 tpd of ore concentrate is going to the Port of Oakland. Is that where it is to be refined, or is it being shipped overseas for processing? If it is being transported overseas, the associated emissions should be included in the GHG analysis since GHG emissions are a global concern.

Unnumbered document page 184 of E.1 (for paved road fugitive emissions from vehicles) shows a table that makes no sense. It has fractions of vehicles making fractions of trips, and then rounds the VMT numbers that result before performing the final calculations. For instance, Freight Trucks have an average of 0.43 daily trips going 0.52 miles and lists their VMT as 0. It appears that the 0 miles travelled is the multiplied by the weight of the trucks, which would yield 0. It also shows only 1 concentrate truck trip per day, whereas elsewhere there are 10 concentrate trips/day. However, there are 5 concentrate truck trips listed on page 186 and 187. This is just an example. Not only concentrate trucks but also other vehicles show different mileage, different trips numbers, etc. throughout the emissions calculations throughout the document. These should all be corrected and standardized before the DEIR is considered adequate.

The emissions estimates assume that all on-site roads will be paved. This should be included as a condition or mitigation measure.

The spreading of 1,000 tons per day of engineered fill with a dozer should be considered in the off-road equipment emissions (dozers are considered to be off-road equipment).

Also, it is not clear how or where the rock is to be "mixed with sands from the ore processing plant to create an engineered fill that meets appropriate geotechnical specifications for construction of development pads." The off-road equipment list includes a "mobile auger blending plant," so it would be presumed that this is how the waste sand from the processing plant would be mixed with waste rock. Every time rock and dirt that contain asbestos are moved there is the potential for additional asbestos emissions. All of these emissions should be included in the Toxic Air Contaminant/Health Risk Assessment evaluation.

The last sentence under Earthwork and Material Handling reads, "Notably, for fill transported to off-site industrial sites (for year 2033 and beyond), emissions associated with fill placement were not included since it was assumed that the other industrial facilities are already receiving,



or would receive, fill from other sources." The big difference between fill transported from the proposed Mine to be deposited in unknown locations around the community contains asbestos. When considering airborne toxics it doesn't make sense to consider emissions from handling fill with asbestos in it as equivalent to emissions from handling fill without asbestos in it.

App. E-1, document page 380/1938 lists 3 diesel generators that would operate 8 hours per day, 7 days per week in perpetuity (operational). Yet, the emissions from these generators are not reflected in the various emission quantification efforts.

Table 4 (off-road construction emissions), p. 32 includes 9 portable diesel generators operating 6 hours/day, 6 days/week.

The Wastewater Septic System does not include any mention of how the wastewater is getting from the Brunswick mine area up the hill to the proposed septic field. The main buildings at the mine are at approximately 2740' and the upper portion of the septic field is at 2875'. Therefore, all of the sewage from the mine's 312 employees plus contractors, visitors and truck drivers has to be pumped a quarter mile up the hill across an elevation gain of 135'. If it is being pumped by a generator, those emissions should be quantified.

Emissions from construction of the septic leach field and quarter-mile sewage line running up hill to the septic system appear to be missing.

The OFFROAD model does not include fugitive emissions. It only includes engine emissions. The Operational Off-road Equipment list (App. E-1, document page 380/1938) lists plenty of off-road equipment at the Brunswick site. Table 8 (Off-Road Equipment Assumptions – Logging and Chipping) includes a grapple loader, a front-end loader, a skidder, a grinder and two excavators. PM/NOA emissions from those do not appear to be included in the TAC calculations, which specify that there would be zero emissions from off-road equipment. This doesn't seem possible given the amount of off-road disturbance from the variety of mobile off-road machinery, most of which moves dirt and rock as its primary function.

The "Earthwork and Material Handling Fugitive Dust" section starting on page 300 only includes a few of the construction activities that are anticipated (SF Creek Culvert Replacement, Pond Berm Repair, Service Shaft Collar and Building Pad). It assumes a serpentinite content (spelled "Sepentinite Concent" in the DEIR) in fill of 14.3%, with an asbestos content of 0.20%. A figure of 0.03% (which should be explained) appears to be derived from these numbers. Then there is a calculation of wind erosion that assumes a disturbed area of 4 acres. The resultant calculated fugitive dust emissions from wind erosion during construction is 0.41 tpy of PM10 and 0.02 tpy of PM2.5. The following unnumbered page (doc page 301) has an unlabeled table which seems to say that only 40,150 tons of fill would be placed per year (versus the proposed 365,000 tpy). The pages after that are unclear. For example, there is a sub-table called "Compaction" as part of the Fill Placement calculation series that notes a piece of equipment ("Cat563") that works for 0.06 hours per day. That is 216 seconds. On that same page is a bulldozer that moves 411.1 tons per hour and works 0.27 hours/day, which is 16 minutes and 12 seconds.

8

The reason for selecting 25 meters as the plume height and width for all of the line volume sources in Table 2 starting on page 8 of Appendix B of Appendix E.1 should be explained.

The DEIR cites AP-42, Ch. 13.3 as a source for blasting emissions information. ANFO is listed in that source as emitting 17 lb/ton of NOx. At 0.93 tpd of ANFO, that comes to 2.89 tons per year of NOx emissions from ANFO detonation. Nitrogen oxides are principally NO2, which is recognized as a TAC. These TAC emissions are not included in the DEIR. The "Underground Blasting and Crushing" section (p. 4.3-56) assumes no TAC emissions from blasting.

ASUR Plan

The NSAQMD is neither approving nor disapproving the ASUR Plan because there is no legal requirement for such a plan – it is part of the project planning documentation.

The ASUR Plan includes corrective actions for certain circumstances. The NSAQMD does not necessarily approve these actions in lieu of other actions or penalties that the NSAQMD or other agencies may prescribe or require. The ASUR Plan cannot be seen as being exclusively directive for the applicant or binding in any way on any agency, and should include a statement to that effect. The enforcement authority of agencies is unaffected by the ASUR Plan.

The ASUR Plan's shortcomings include difficulties with enforceability, uncertainty regarding the exact nature of control technologies to be used, the self-policing nature of the plan and a way to quickly evaluate its effectiveness.

The first page of the ASUR's Table includes the TEM % by weight, but the next two pages omit this statistic.

The summary table (1st page of Appendix C) is missing a sample. It appears to be sample Y962992, which has the highest concentration of asbestos of any of the rock samples (7.3 structures per nanogram, or 7,330,000,000 asbestos fibers per gram).

ASUR 5.0 paragraph 5 reads, "The great majority of mine tunneling in barren rock for the Idaho-Maryland Mine Project is expected to occur in the meta-andesite porphyrite "Brunswick Block". No asbestos was detected by PLM in samples from the meta-andesite porphyrite lithology. Asbestos was detected in six of the eighteen samples by TEM methods and the eighteen samples averaged 0.26 TEM structures per nanogram (s/ng) or 0.002% PCM asbestos by weight." Here again the conversion to PCM is unwarranted, since OEHHA's PCM conversion only applies to air monitoring samples. The TEM data sheets provide a calculated asbestos percentage, which averages to 0.192% asbestos by weight in the porphyrite samples. At this concentration, in the daily mining of 1,500 tons there would be 2.88 tons of asbestos. However, using the inferior PLM quantification technique there would appear to be no asbestos at all.

Similarly, Table 2 of the Vergence report illustrates the superiority of TEM to PLM analyses in the comparison of two results from the same core sample. The 1.1 foot-long core from hole #I-19-13, which was from a depth of 5090.50 feet to 5091.60 feet, was analyzed using both TEM

and PLM. The less reliable PLM method did not detect any asbestos but the TEM method detected 2.0% asbestos. The average asbestos content in the two TEM-evaluated samples of serpentinite was 2.8%.

The proposal to use PLM for compliance purposes may be convenient, but there is a big difference between PLM results and TEM results. TEM is preferred for asbestos quantification because it is able to detect smaller particles. A comparison between PLM and TEM results shows that there are a lot of asbestos fibers in the rock that are too small to be detected using PLM. Choosing to use PLM is, in effect, choosing not to see the asbestos.

Asbestos has been found in all of the kinds of rocks that were analyzed from the site (porphyrite, diabase, sand tailings, unmineralized serpentinite, weakly ankeritized diabase/serpentinite, ankeritized serpentinite, and serpentinite). With only a relatively few samples having been analyzed, there is no way to know how much asbestos is present in a given untested rock sample, but every fragment of rock or soil from the mine or the mine tailings could contain asbestos. When those rocks are broken or that soil is driven on or otherwise disturbed, asbestos fibers could be released to the air in unknown concentrations. Once airborne, tiny asbestos fibers can potentially travel many miles.

There is at least one serious mistake in the TEM lab reports. The sheet for sample Y962990 lists a "Calculated Asbestos Concentration (Weight %)" for chrysotile asbestos as .075% (29 million fibers per gram), so there is obviously an error in the reporting of the total as <0.001 %. The percentage of total asbestos can't be less than the percentage of a particular kind of asbestos.

Page 14, item 7 says that records of all analytical test work will be kept for a minimum of 7 years. Since asbestos related diseases often do not show up for 40 years or more, 7 years is not long enough for recordkeeping. Instead, the records should be kept (at least in electronic form) until at least 40 years after the mine closes.

Page 8, item 3 says, "Lithological units and gold mineralization will be adequately sampled and tested for naturally occurring asbestos…." The term "adequately sampled" is meaningless. Item 3 also includes some vague phrasing about testing using PLM and TEM. Is every sample to be tested both ways? How often? Also, in addition to converting TEM results to PCM with OEHHA's conversion formula, the TEM results should be reported and available to the public.

The ASUR Plan should include measures to prevent secondary asbestos emissions from workers' clothing and shoes. Historically, family members of individuals who have worked in mines where naturally occurring asbestos is present have been exposed to asbestos from the workers' clothing and shoes, resulting in asbestosis and mesothelioma. Asbestos exposures to the general public could also occur if workers carry asbestos-containing soil on their shoes and clothing into local places of business, such as restaurants, retail stores, fitness centers, etc. Showering on-site and changing shoes and changing and washing clothing at the end of a worker's shift is one way to prevent this type of secondary exposure. Alternatively, workers could wear protective suits and shoes that stay on-site. The manner of keeping asbestos from



leaving the site on workers' clothes, shoes and persons could be considered an airborne toxics mitigation measure.

The publication cited in the ASUR Plan, "NIOSH (2019). *Dust control handbook for industrial minerals mining and processing. Second edition*. https://doi.org/10.26616/NIOSHPUB2019124" discusses additional options for dust control, including the use of wind fences, fixed water spray systems and crust-forming agents, and covering inactive areas with clean gravel. The discussion of dome enclosures on page 357 of that document in particular should be reviewed (large ones can span a thousand feet and they can withstand 90-mph winds and heavy ice loads). Such technologies should be discussed/evaluated in the DEIR

As the tunnels progress and more samples are tested for asbestos, an ever-increasing knowledge base will develop. There should be a way to refine the ASUR Plan and reassess the project periodically. As a precedent, Teichert Aggregates has a 5-year conditional use permit review requirement for their Martis Valley operation near Truckee. If it is found that asbestos emissions are great enough to create a significant health risk, there should be a way to put the project on hold for as long as necessary to find ways to bring the asbestos emissions down, such as through additional or new technologies. It would be short-sighted to commit to the ASUR Plan for the entire life of the mine based on the few samples that have been tested so far. As time passes, technology advances. There may be a way to quickly monitor for asbestos emissions or assess the asbestos content of the rock body in the future. Control technology also advances, and someday there may be ways to further reduce the release of microscopic airborne asbestos fibers into the community.

Some of the gold veins are known to be hosted entirely in serpentinite. The NSAQMD recommends considering leaving those veins untouched for at least 40 years, by which time emission control technology is likely to have improved. Electrostatic mist screens, for example, show promise among emerging technologies.

Water

The Water Supply Assessment (WSA) is important because an abundant supply of water is necessary for the control of dust and toxics such as silica and asbestos. Unfortunately, it does not include enough detail to evaluate its accuracy. There should be an itemized list, or inventory, of water usage features so that reviewers can check to see if key elements are being overlooked or mischaracterized.

The water usage estimates are based on usage at "buildout." The document considers the first 10 years as the "construction" period because that is when the waste material is being deposited and compacted as engineered fill at the Centennial and Brunswick sites. It reads, "Because this WSA is assessing the impacts at buildout of the Proposed Project, the water demand during construction will not be included in buildout water demands." However, the buildout phase is not when the project would use the most water. That is, unless the eventual off-site compaction of engineered fill were to be included in water usage, that would increase the buildout consumption, especially since it would require an abundance of water due to the

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presence of asbestos in the fill and the resulting requirement to comply with the Asbestos Airborne Toxic Control Measures for all fill placement activities (not discussed in the DEIR).

The DEIR estimates 5,700 gpd of potable water for sinks, toilets, showers and laundry. It would be important to have adequate shower capacity at the facility for the hundreds of anticipated employees. Workers in the mine would continually be subject to air saturated with moisture to the point of it dripping off their clothing (the DEIR specifies that there would be 100% saturation of the air in the mine). Dust laden with asbestos and other toxic substances would stick to skin, hair and clothing. Workers should not be allowed to leave the site with asbestos dust on their bodies, clothes or shoes because they would carry the asbestos dust into public places or home to people they live with.

A key question regarding water use assumptions is if the non-potable water would be of high enough quality to use for "100 percent saturation of air" (estimated at 40,000 gpd). If it has elevated levels of natural contaminants (such as arsenic, mercury and other heavy metals, iron and manganese) or if it has too much of the proposed water treatment and ore processing chemicals, it may not be suitable for employees to breathe. Water pumped from the mine would contain numerous substances including sodium hypochlorite (bleach), ammonia (partly from detonation of 1,860 lbs/day of ANFO explosive), potassium permanganate, sulfuric acid, sodium hydroxide, sodium bisulfite, assorted lubricants and petroleum products lost from equipment, and reagents including Aerofloat 208 (odor of alcohol and sulfur), Aerophine 3418A, Aerofroth 70-MIBC (odor of alcohol), Magnfloc 10 and Scaletrol PDC9401.

The ASUR Plan proposes that unpaved areas will be watered for dust suppression every 2 hours, which should be considered carefully in the WSA. The NSAQMD is concerned that the water budgeted for the project might not be adequate to meet the dust control requirements. Since the dust contains asbestos, silica and numerous other toxic substances, adequate dust control is necessary. There should never be a situation where dust control is compromised because of water usage restrictions, particularly in the summer months when the potential for dust generation is greatest.

https://www.epa.gov/sites/default/files/2019-04/documents/mr_guidanceforapplicationfordustcontrolpermit.pdf contains some "rules of thumb" for estimating water usage. For example, grading uses approximately 10,000 gal/acre per day; 30 gallons is required for each cubic yard moved; and pre-wetting areas to be disturbed requires 1 acre-foot of water (325,851 gal) per acre of land. The Health Risk Assessment (page 3) says that 104 acres are to be disturbed.

A lot of water is also needed for grinding mills, crushers, conveyors, conveyor transfer points and drop points to control emissions of dust and asbestos.

AGENCY LETTER 12: SAM LONGMIRE, NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT

Response to Comment Agcy 12-1

This letter is superseded and replaced by Agency Letter 11. Please see comments made in Agency Letter 11 and Response to Comments Agcy 11-1 through Agcy 11-20 above.

Group Letter 1

Alliance For
Workforce Development, Inc.
Providing pathways to success

P.O. Box 1800
Grass Valley, CA 95945
(530) 265-7088
(530) 477-6891 Fax
www.afwd.org

March 23, 2022

Mr. Kelley:

The Alliance for Workforce Development, Inc. (AFWD) is Nevada County's local workforce development organization. We are dedicated to enhancing the quality of life throughout the communities we serve.

Grp 1-1 Our mission is to empower people to find job training and new opportunities to build or expand a career for themselves. Every day we work to help people who are trying to find a new path forward economically, sometimes under very difficult circumstances. We sit on the front lines of the current economic crisis. The effect of COIVD-19 in particular has caused tremendous disruption and displacement for many in the communities we serve.

Grp 1-2 We met with Rise Grass Valley CEO Ben Mossman to discuss recruiting and job training opportunities available through AFWD. Rise Grass Valley has signaled to us a willingness to recruit a diversified workforce, to conduct extensive on-site job training, and to work with our local schools and colleges to develop essential training programs for potential hires.

In addition to the direct jobs, Rise Grass Valley anticipates that roughly 300 indirect new jobs could be created by the economic multiplier that the mine will demand – anything from related construction work to demand for more restaurants and hotels. This can be a tremendous lift to our entire local economy and workforce.

Grp 1-3 We are very encouraged that Rise Grass Valley reached out to us to discuss a meaningful collaboration. We count on employers like them to proactively consider their future workforce needs, and to treat their growth in the community as a mutually beneficial partnership. Should the project move forward, we are committed to working with Rise Grass Valley for all their workforce needs.

If you have any questions, please feel free to contact me.

Sincerely,

Kristine ZuaZua

Kristine ZuaZua, Director of Programs
Alliance for Workforce Development
988 McCourtney Road
Grass Valley, CA 95949
530-265-7088

Serving Butte, Lassen, Modoc, Nevada, Plumas & Sierra Counties
A proud partner of America's Job Center of California℠ Network

GROUP LETTER 1: KRISTINE ZUAZUA, ALLIANCE FOR WORKFORCE DEVELOPMENT, INC.

Response to Comment Grp 1-1
The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 1-2
The comment is noted for the decisionmakers. The comment does not address the adequacy of the DEIR and no further comment is warranted.

Response to Comment Grp 1-3
The comment is noted for the decisionmakers. The comment does not address the adequacy of the DEIR and no further comment is warranted.

Group Letter 2

April 4, 2022

Matt Kelley, Senior Planner
County of Nevada Community Development Agency
Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617

Delivered via email: idaho.MMEIR@co.nevada.ca.us and matt.kelley@co.nevada.ca.us

RE: Idaho-Maryland Mine Project Draft Environmental Impact Report, SCH# 2020070378

Dear Mr. Kelley,

On behalf of the Board of Directors, staff, and over 700 members of the Bear Yuba Land Trust (BYLT), I am submitting the following comment letter regarding the Draft Environmental Impact Report (DEIR) for the proposed Idaho-Maryland Mine (IMM) project (Project). BYLT also submitted a comment letter on the Notice of Preparation (NOP) that was dated August 17, 2020. We are disappointed to find that many of our comments were not specifically addressed in the DEIR at a level of detail commensurate with the environmental impacts of the proposed Project.

Grp 2-1

Who We Are

The mission of BYLT is to protect and defend the working and natural lands of the Bear and Yuba River Watersheds. The lands under our care include conservation easements covering over 18,000 acres of forests, ownership of land leased to Mountain Bounty Farm and a working cattle ranch on the Bear River, and the maintenance and construction of more than 45 miles of publicly accessible trails in Nevada and Yuba Counties. We believe that long-term planning, with a goal of sustainability and resilience in the face of many unknown climate change and development impacts, must be at the forefront of all decision-making. BYLT is accredited by the Land Trust Alliance (LTA) and is recognized as a land conservation organization that meets national standards for excellence, upholds the public trust, and ensures that conservation efforts are permanent.

PO Box 1004, Grass Valley, CA 95945 • *phone:* (530) 272-5994 • *fax:* (530) 272-5997 •
www.BearYubaLandTrust.org

Bennett Street Grasslands Conservation Easement

Impacts posed by the IMM Project to our 7-acre Bennett Street Grasslands Conservation Easement (Easement) located along East Bennett Street just below the Brunswick site and south of the Centennial site are of great concern (see Attachment 1, Map). This valuable natural asset, owned by California State Parks and protected by BYLT, is bisected by South Wolf Creek, into which the Project will be releasing at least 5.6 cubic feet per second (cfs) of potentially polluted residual mine water.

BYLT is legally bound to protect the conservation values of the Easement property from outside impacts in perpetuity. As stated in the Deed of Conservation Easement dated November 30th, 1999 (see Attachment 2, Conservation Easement), the natural, ecological, and aesthetic values of the Property (which includes South Wolf Creek) are to be preserved and maintained by the continuance of protection in perpetuity, and "to enhance the restoration of the ecosystem, the natural systems and processes, and the aesthetic values of the Property".

Grp 2-2

The rights conveyed by the Easement include "the right to identify, to preserve and protect in perpetuity, and to enhance the natural and open space, the ecological, scenic and aesthetic features, the water resources, and the natural flora and fauna on the Property." BYLT is required to monitor the Easement yearly and provide a report to State Parks. We are also required to implement a Management Plan prepared for the Easement. The report and Management Plan note that riparian thickets along the creek and associated grasslands provide important habitat including nesting and foraging opportunities for many bird species, including rare and endangered birds. Ecologists have noted that the grassland is one of the best examples of what Grass Valley looked like prior to European settlement. As a result, monitoring activities have been completed on the Easement by the local chapter of the Audubon Society, California State Parks, and other local bird groups such as Gold Country Avian Studies, which has conducted bird banding at the site for over 5 years. California State Parks has been managing various invasive species and conducting in-stream restoration in the creek to preserve the habitat values of this protected riparian corridor (Attachment 3, Photos).

Impacts to Legal Obligations of Bennett Street Conservation Easement

The proposed Project has the potential to significantly affect our ability to meet our legal obligations, i.e., to protect and defend ecological habitats contained within our conservation easements, yet this is not described anywhere in the DEIR. We are very concerned that the Project will adversely affect water quality and quantity in South Wolf Creek and the conservation values of this valuable Easement beyond what is described in the DEIR. As stated in the Deed, "the Property consists of six general ecosystems within the Northwest Sierra Nevada Ecological Subregion of California, with a large population of rare California Reedgrass Tall Closed Graminoid community, a madrone forest of unusual stature, and a montane riparian forest community which provides nesting, foraging, and cover for a variety of common wildlife species, including California black bear, and mountain lion". Yet, direct impacts to these sensitive habitats as a result of sending an additional 5.6 cubic feet per second (cfs) of

Grp 2-3

2

potentially contaminated wastewater through the Easement are not addressed in the DEIR. This is a violation of CEQA.

According to CEQA Section 15125(a), "An EIR must include a description of the physical environmental conditions in the vicinity of the Project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." The obvious purpose of this requirement is "to give the public and decision makers the most accurate and understandable picture practically possible of the Project's likely near-term and long-term impacts." The Less than Significant impact finding for natural communities and special-status species is based on a study area that is far too narrow to make this conclusion.

As a land trust, BYLT has been entrusted by the community, its members, landowners, and local jurisdictions to protect and preserve our Easements. This is done using vital financial, administrative, and legal resources. To diminish our ability to provide these services and accomplish our mission reduces our ability to defend conservation values and broker new agreements with willing landowners. If we cannot guarantee protection, our mission is compromised. Yet, this is not discussed in the DEIR Land Use Section 4.9-2 (page 4.9-18) under consistency with plans and policies as required by CEQA.

This section of the DEIR should not just discuss County policies, but also the policies of partner organizations such as BYLT. In fact, Nevada County General Plan policies directly relate to BYLT, yet are not discussed or described. Excerpts from the General Plan include the following:

Objective 11.5: Support the acquisition, development, maintenance and restoration, where clearly consistent with General Plan policies, of habitat lands for wildlife enhancement.

Directive Policies Policy 11.10: Cooperate with State and Federal agencies and public and quasi-public organizations and agencies in the acquisition, restoration, and maintenance of habitat lands.

Policy 6.10: The County shall support the activities of the Nevada County Land Trust [now BYLT] and Truckee-Donner Land Trust to acquire and manage open space lands. These non-profit Trusts shall be encouraged to acquire open space through dedication or voluntary purchase from willing sellers of property of easements. The Trusts shall be encouraged to acquire land or other real property interests which could focus on lands which contain unique, valuable or sensitive resources reflecting environmental or biological sensitivity; scenic landscape units; community separators; historic, cultural, and archaeological content; and low intensity recreational potential.

These General Plan policies are not discussed in any section of the DEIR and the project's inconsistencies with these important policies is not identified. This is a violation of Section 15125 of the CEQA Guidelines and we ask that the section be revised and the DEIR recirculated with this information. The long-term viability of land trust property rights must be disclosed and defended so that we can best protect the conservation purposes of the Easement.

3

Habitat and Ecological Value of Bennett Street Conservation Easement

The Bennett Street Conservation Easement Property is documented habitat for the State-listed as Endangered willow flycatcher (*Empidonax traillii)* and three California Department of Fish and Wildlife (CDFW)-listed Species of Special Concern: olive-sided flycatcher (*Contopus cooperi*), yellow-breasted chat (*Icteria virens)*, and yellow warbler (*Setophaga petechia*). These birds have been documented within the grasslands and riparian corridor of the Property. In addition, the South Fork of Wolf Creek flowing through the Property possesses habitat for the following federal and California Department of Fish and Wildlife species of concern which have been reported in the nearby surrounding area: Foothill yellow-legged frog, (*Rana boylii*) and Northwestern Pond Turtle, (*Clemmys marmorata marmorata*). Many other non-listed species depend on the South Fork of Wolf Creek for habitat, and food sources found in this declining habitat in the Grass Valley area of Nevada County, California.

The Conservation Easement states, "WHEREAS, all of these natural, ecological, and aesthetic values are of great importance to the Grantor and to the people of the State of California, and are worthy of preservation; and WHEREAS Grantor desires and intends that the natural, ecological, and aesthetic values of the Property be preserved and maintained by the continuation of patterns of land use on the Property that will not interfere with or substantially disrupt the ecosystem or workings of the natural systems."

Grp 2-4

Again, we find no meaningful discussion of the ecological value of the Easement or a discussion of how the Project will affect the water quality and quantity that would flow through South Fork Wolf Creek post-Project affecting animal and plant communities in the Easement. The preparers of the DEIR seem to believe that the Easement is currently disturbed similar to the Centennial and Brunswick Industrial Sites. Nothing could be further from the truth. The condition of South Wolf Creek on the Easement has been protected for at least 24 years by BYLT. It is a natural and protected channel in this location, yet that is not recognized in the DEIR. This condition and the potential impacts of the Project must be analyzed in this context as required by CEQA and feasible mitigation measures, including rigorous pre-construction surveys and post-construction mitigation monitoring for these specific and other communities must be evaluated. In addition, the ecological values of the seasonal and perennial wetlands on the Easement must be evaluated for impacts.

For example, there is no specific discussion of the effects on benthic macroinvertebrates and amphibians within South Wolf Creek. This includes the federal- and state-listed foothill yellow-legged frog which may be most impacted by increased flows as tadpole eggs and invertebrates may get washed downstream and are unable to complete their life cycles. As benthic macroinvertebrate numbers decrease in the channel, fish, such as brown trout present in the creek, may also decline in numbers as their food source declines. To say that the proposed Project would not result in temporary or permanent impacts because encroachment would not occur within 100 feet of the waterway does not account for direct impacts just downstream to water quality, quality, and wildlife.

4

Impacts to Riparian Corridor

Increased flows in South Fork Wolf Creek may change the plant community composition and distribution along areas adjacent to the creek. Conditions may be too wet for some plant species to grow and they may be displaced from the site all together. This situation would not only affect plant species, but also the inter-related habitats for aquatic and nesting and foraging bird species that utilize the Easement. We can find no discussion of these CEQA impacts in the DEIR.

Grp 2-5

As currently proposed, the Project will alter the hydrology and hydroperiod of South Fork Wolf Creek. The current base flow of South Fork Wolf Creek is approximately 2 cfs. Under the proposed Project, flows would increase to over 7 cfs for 80 years during Project operations. The distribution of seasonal and perennial wetlands located within the Bennett Street Grasslands Easement would change over time in response to the changes in hydrology of the creek. How will this impact be monitored in the long-term? We can find no discussion of these CEQA impacts in the DEIR. Further, we can find no visual representations such as cross-sections of the creek to show how much water an additional 5.6 cfs will raise water levels. This is vital information for the decision makers and public to have when considering potential impacts.

Wildlife Migration/Movement Corridors

Grp 2-6

The discussion in the DEIR related to wildlife migration/movement corridors is limited to deer on the Brunswick and Centennial Industrial Sites This is inadequate. The corridor of the South Fork Wolf Creek and the entire Easement site are vital wildlife movement corridors that could be affected by changes to water quantity and quality. Evidence of numerous large mammal and raptor species is easily seen on the Easement property. The inter-related nature of ecological communities is not acknowledged in the DEIR. When one species is adversely affected either by poor water quality and a change in food sources, other species are affected as well. This impact, which is a specific question in Appendix G of the CEQA guidelines, has not been adequately answered. This is a violation of CEQA.

Insufficient Surface Water Quality Monitoring and Sampling

Grp 2-7

No baseline surface water quality data is included in the DEIR and therefore, the background concentrations of basic water quality parameters such as inorganic cations and ions, metals, total suspended solids, pH, dissolved oxygen (DO), and water temperature in South Fork Wolf Creek are currently unknown. When the mine begins operations and begins pumping water into the creek to dewater the mine shafts, the change in water chemistry will be unknown because there is no baseline data to compare to the Project conditions.

As previously stated, CEQA Section 15125(a) states that "An EIR must include a description of the physical environmental conditions in the vicinity of the Project." We cannot find any mention of baseline monitoring of surface water quality of South Fork Wolf Creek, especially considering concerns related to changes to pH, temperature, DO, and turbidity. Impacts to

5

water quality in the DEIR are founded on the assumption that compliance with NPDES-permit-regulated-discharge requirements will protect aquatic biological resources. This assumption is not adequate for this Project, especially when a baseline of existing conditions has not been provided, is a violation of CEQA.

We propose that baseline surface water sampling in South Fork Wolf Creek should be completed monthly to obtain surface water quality data that represents pre-Project conditions. In addition to monthly sampling, the following should be completed:

- Sampling during or just following the "first flush" storm event of the season (greater than 2 inches rain in Grass Valley); and
- Sampling during or just following qualifying rain events (greater than one inch of rain in Grass Valley).
- Both filtered and unfiltered samples should be obtained during each sampling event and analyzed for constituents of concern in addition to other metals and inorganic constituents. Once a statistically significant number of surface water samples is obtained, baseline data for each constituent of concern can be established. If and when discharge of treated mine water commences, sampling should continue at least quarterly and during storm events as described above. Data would be compared to the established background levels to determine whether water quality exceeds site specific water quality goals. There is no mention of post-Project surface water quality sampling. This testing is only meaningful with a statistically significant database of background surface water quality constituents.

Regional Water Quality Control Board Requirements

We find the following statement to be grossly insufficient with surface water compliance standards. The Project Description (DEIR page 3-15) states:

"Water produced during dewatering would be treated prior to discharge to South Fork Wolf Creek. It is anticipated that the discharge would occur in compliance with the Central Valley Regional Water Quality Control Board Order No. R5-2016-0076, National Pollutant Discharge Elimination System (NPDES) No. CAG995002, which was adopted on October 14, 2016."

Grp 2-8

The samples used to determine constituents of concern for water treatment came from the Brunswick Shaft. The drains off of Idaho Maryland Road would have been a more appropriate sample location to assess water quality of the pumped groundwater. A project of this magnitude should know and disclose at this stage exactly what Regional Board orders and permits to which it must comply. To not include actual regulatory requirements of what measures are required to meet Regional Board requirements pertaining to the discharge of potentially hazardous wastewater, does not give the public or decision makers a realistic understanding of the impacts of the proposed Project. What mitigation measures will the Regional Board require? To relegate the identification of mitigation measures to a future time is the definition of deferring mitigation, which is not allowed under CEQA.

6

There are no specific Regional Board requirements provided in the Project Description section of the DEIR. Therefore, we cannot be certain that "The water discharged into South Fork Wolf Creek is expected to be at least as good or better quality than the water typically flowing through South Fork Wolf Creek." (DEIR page 3-18). The document implies that because the Project has not yet been developed to a level of detail needed to include these important specific mitigation measures, they do not need to be included. CEQA requires that the project description supply the amount of information needed for evaluation and review of the environmental impacts (Section 15124 of the CEQA Guidelines). In addition, all mitigation must be identified and feasible. Mitigation measures are required to read as "shalls" rather than "woulds" and those included "as part of the Project", must so state.

We find that there is substantial evidence showing the creek's water quality would be adversely affected by Project-generated surface water runoff. Total maximum daily load (TMDL) was not used to measure this project impact; therefore, we find that the DEIR failed to determine its significance, either individually or cumulatively.

Grp 2-9

In addition, we are very concerned about turbidity and water quality impacts during construction of the water treatment facility and other grading at the Brunswick Industrial Site directly upstream from the South Fork Wolf Creek. While a Stormwater Pollution Prevention Plan (SWPPP) will be required, in our experience, these are generally inadequately monitored. Contractors often self-monitor and their BMPs are commonly installed inadequately. A third-party firm should be in charge of preparing and monitoring the SWPPP and all conditions and penalties for violations must be described in the DEIR. Otherwise, the mitigation is not identified and CEQA is violated because the mitigation is not included in the Project. CEQA does not allow the deferral of mitigation to the future.

Martis Valley Case Law Precedence

Grp 2-10

In the sections above, we have factually stated many areas in which the proposed project would result in potentially significant impacts to the Bennett Street Grasslands Conservation Easement. Yet, these impacts are not disclosed or discussed in the DEIR. A recent, local court case *(League to Save Lake Tahoe, Mountain Area Preservation, et al./California Clean Energy Committee v. County of Placer, et al. (Sierra Pacific Industries, et al., Real Parties in Interest) (2022)* Cal.App.5th., also known as the Martis Valley Case) sets important legal precedence for evaluating established CEQA rules and principles, including, but not limited to, those governing: applicable standards of review; baseline/environmental setting description; lead agency discretion regarding thresholds of significance, methodology for impact study, and significance determinations; cumulative impacts (including GHG) analysis; and requirements for adequate mitigation measures.

Similar to the conclusions of the Martis Valley Case, we find that the DEIR fails to provide baseline/environmental setting description; provides poor methodology for impact study, and significance determinations; cumulative impacts analysis; and adequate mitigation measures.

7

Alternatives

Section 6.4 of the DEIR attempts to describe an Environmentally Superior Alternative as required by Section 15126(e)(2) of the CEQA Guidelines. The section states that Alternative 2 is the Environmentally Superior Alternative, yet we believe a combination of Alternatives 2 and 4 is more appropriate and would meet the main objectives of the project while substantially reducing environmental impacts. This combination, which is feasible and reasonable (as defined by CEQA), would include no placing of mine tailings at the Centennial Site, yet would still include clean-up as required by DTSC. Further, reducing the extraction as described in Alternative 4 without extending the number of years the mine is in operation would further reduce impacts while also eliminating the need for fill to be deposited on the Centennial Site. This environmentally superior alternative would also reduce the potential for adverse water quality and quantity impacts to South Fork Wolf Creek, as described earlier in this letter. Please revise the DEIR to include this more Environmentally Superior Alternative.

Grp 2-11

Statement of Overriding Considerations

CEQA Guidelines Section 15093 states the following:

"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." The agency must state in writing the specific reasons to support its action to approve based on the Final EIR, supported by substantial evidence in the record.

Grp 2-12

We encourage the County Board of Supervisors to carefully consider how the economic benefit to mine operators and owners outweighs the significant environmental impacts of the proposed Project. The Board of Supervisors has the ability, in fact, it is their obligation, to deny the project based on its lack of benefit to the community.

Conclusion

We have identified many inadequacies of the DEIR in this letter. For these reasons, we believe the DEIR must be corrected and re-circulated for public comment. The CEQA process for this Project must give the decision makers and the public every opportunity to understand the potential impacts of the Project as well as to identify feasible, comprehensive, and specific mitigation measures. Otherwise, the public can have no certainty that far-reaching adverse impacts will not occur.

Grp 2-13

8

For over 30 years, BYLT has safeguarded critical habitats and provided assurances to our community that we will protect the conservation values of the lands we are entrusted with. We are legally bound to protect the Conservation Easement values of the Bennett Street Grassland Conservation Easement and the Project puts our ability to accomplish our mission in legal jeopardy. For all of the above reasons, we find the Draft EIR to be legally insufficient to support the Idaho-Maryland Mine Project.

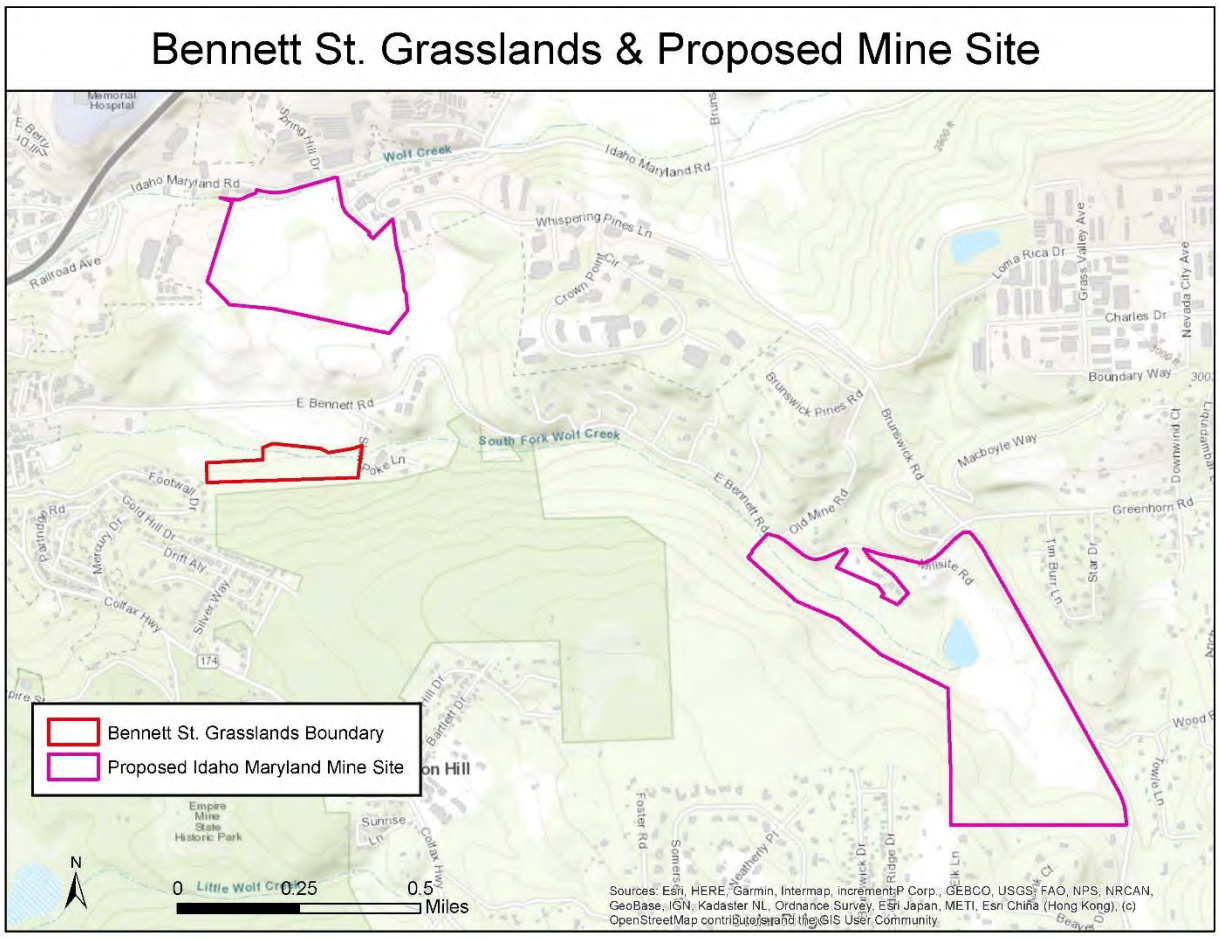
Respectfully Submitted,



Erin Tarr
Executive Director
Bear Yuba Land Trust
erin@bylt.org

9

Attachment 1
Map of Bennett Street Conservation Easement and IMM Project Boundary


Bennett St. Grasslands & Proposed Mine Site
Bennett St. Grasslands Boundary
Proposed Idaho Maryland Mine Site
N
0
0.25
0.5
Miles
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community
Idaho Maryland Rd
Wolf Creek
Whispering Pines Ln
E Bennett Rd
South Fork Wolf Creek
Brunswick Pines Rd
Brunswick Rd
Macboyle Way
Old Mine Rd
Greenhorn Rd
Boundary Way
Charles Dr
Loma Rica Dr
Grass Valley Ave
Nevada City Ave
Railroad Ave
Footwall Dr
Gold Hill Dr
Drift Aly
Colfax Hwy
Silver Way
Empire Mine State Historic Park
Little Wolf Creek
Foster Rd
Sunrise Ln
Tim Burr Ln
Star Dr
Downwind Ct
Wood Rd
Towle Ln

Attachment 2
Bennett Street Conservation Easement

Received NCLT 6/14/00
15

RECORDING REQUESTED BY:
California Land Title Company #84434-BM
WHEN RECORDED MAIL TO:

Nevada County Land Trust
P.O. Box 2088
Nevada City, Ca. 95959

Nevada, County Recorder
Jewett-Burdick
DOC- 2000-0013132-00
Acct 1-California Title Co.
Wednesday, MAY 10, 2000 08:00:00
REC $19.00 MIC $1.00 AUT $15.00
SBS $14.00
Ttl Pd $49.00 Nbr-0000034296
DPH/DH/1-15

THIS SPACE FOR RECORDERS USE ONLY

TITLE OF DOCUMENT DEED OF CONSERVATION EASEMENT

GRANTOR NAME John P. O'Brien, Claire E. O'Brien, Robert T. Roark

GRANTEE NAME Nevada County Land Trust

THIS DOCUMENT IS BEING RE-RECORDED TO INCLUDE LEGAL DESCRIPTION THAT WAS ELIMINATED FROM DOCUMENT IN ORIGINAL RECORDING.

THIS PAGE ADDED TO PROVIDE ADEQUATE SPACE FOR RECORDING INFORMATION
(ADDITIONAL RECORDING FEE APPLIES)

California Land Title Compa
#84434-BM

RECORDING REQUESTED BY:

Nevada County Land Trust

WHEN RECORDED MAIL TO:

Nevada County Land Trust
PO Box 2088
Nevada City, CA 95959

013132

Nevada, County Recorder
Jewett-Burdick
DOC- 1999-0942858-00
Acct 1-California Title Co.
Wednesday, DEC 15, 1999 08:00:00
REC $15.00 MIC $1.00 AUT $11.00
SBS $10.00 DOC $61.05
Ttl Pd $98.05 Nbr-0000014208
CNO/CO/1-11

Documentary transfer tax is $61.05
Computed on full value

DEED OF CONSERVATION EASEMENT

THIS GRANT DEED OF CONSERVATION EASEMENT (this "Easement"), made as of this November 30th, 1999, by Robert T. Roark, Trustee udt dated 4/13/84 whose address is Box 670, Grass Valley, California, 95945 and John P. O'Brien and Claire E. O'Brien husband and wife; and John P. O'Brien and Claire E. O'Brien as trustees of the John and Claire O'Brien Trust dated 3/30/95 whose address is 17072 Norlene Way, Grass Valley, California, 95949 (hereinafter referred to as the "Grantor"), and NEVADA COUNTY LAND TRUST, a California non-profit corporation whose address is P.O. Box 2088, Nevada City, California, 95959 (hereinafter referred to as the "Grantee"); (collectively, the "Parties");

WITNESSETH:

WHEREAS, Grantor is the owner of the following real property in Nevada County, California located at Bennett Street east of Grass Valley city limits more specifically described as a portion (portions) of Nevada County Assessor parcel numbers 09-560-06 and 09-560-23 (hereinafter referred to as the "Property"), described in Exhibit A attached hereto and made a part hereof; and

WHEREAS, the Property constitutes a valuable element of the foothill cottonwood-willow riparian forest and California native grassland habitat, and its ecological, scenic, and aesthetic and open space values as recognized in California acts and statutes; and

WHEREAS, the Property consists of six general ecosystems within the Northwest Sierra Nevada Ecological Subregion of California, with a large population of rare California Reedgrass Tall Closed Graminoid Community, a madrone forest of unusual stature, and montane riparian forest community which provides nesting, forage and cover for a variety of common wildlife and species, including California black bear, and mountain lion; and

WHEREAS, the Property does possess the habitat for the following federal and California Department of Fish and Game species of concern which have been reported in the nearby surrounding area: Foothill Yellow-legged Frog, *Rana boylii*, Northwestern Pond Turtle, *Clemmys marmorata marmorata*; and

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WHEREAS, maintenance of such habitat helps support many other non-listed species dependent on the water source, nesting habitat and food sources found on this declining habitat in the Grass Valley area of Nevada County, California; and

WHEREAS, all of these natural, ecological, and aesthetic values are of great importance to the Grantor and to the people of the State of California, and are worthy of preservation; and

WHEREAS, Grantor desires and intends that the natural, ecological, and aesthetic values of the Property be preserved and maintained by the continuation of patterns of land use on the Property that will not interfere with or substantially disrupt the ecosystem or the workings of the natural systems; and

WHEREAS, Grantor, as the owner in fee of the Property, owns the rights to identify, to preserve and protect in perpetuity, and to enhance the restoration of the ecosystem, the natural systems and processes, and the aesthetic values of the Property; and

WHEREAS, Grantor desires and intends to transfer certain of such rights to the Grantee for the express purpose of furtherance of the identification, preservation and protection in perpetuity and the enhancement and restoration of the ecosystem, the natural systems and processes, and the aesthetic values of the Property; and

WHEREAS, Grantee is organized to preserve and conserve natural areas and significant land for ecological, scenic, aesthetic, charitable, recreational and educational purposes; and

WHEREAS, the State of California has recognized the importance of private efforts toward the preservation of natural systems in accordance with the laws of California; and

WHEREAS, the Grantee is a qualified private organization under the terms of California State Code and is qualified to receive and hold conservation easements as provided in California Civil Code Sections 815 and 816; and

WHEREAS; the Grantee is an organization described in Section 170 (h)(3) of the United States Internal Revenue Code qualified to receive and hold conservation easements;

NOW, THEREFORE, in consideration of the mutual covenants contained herein, and pursuant to state code, Grantor hereby conveys to Grantee this Easement, for the express purposes as set forth herein, consisting of rights hereinafter enumerated, on, over, and across the Property.

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SECTION I - RIGHTS CONVEYED

The rights conveyed by this easement are the following:

A. Identification and Protection. The right to identify, to preserve and protect in perpetuity, and to enhance the natural and open space, the ecological, scenic and aesthetic features, the water resources, and the natural flora and fauna on the Property, in the manner set forth in this Easement; subject, however, to Grantor's reserved rights as described in this Easement.

B. Access. The right to enter upon the Property to inspect the same and enforce the rights herein granted, and to observe, study, and make scientific observations of its ecosystems, at such times and frequency as is reasonable for the furtherance of the express conservation purposes of this Easement and in a manner that will not unreasonably interfere with the use of the Property by Grantor, or with the rights of the others on the Property, if any. Notwithstanding the foregoing, in addition, Grantee shall have the right of immediate entry upon the Property if, in Grantee's sole judgment, such entry is needed to prevent damage to or the destruction of the conservation purposes of this Easement.

C. Injunction and Restoration. The right to enjoin any activity on, or use of, the Property which is inconsistent with this Easement, and to enforce the reasonable restoration of such areas or features of the Property as may be damaged by such activities and consistent with the management plan by the Nevada County Land Trust, the Nevada County Conservation Alliance and The Empire Mine State Historic Park, California Department of Parks and Recreation (the "Management Plan") .

SECTION II - GENERAL EFFECT OF EASEMENT

A. Perpetual Restrictions. This Easement shall run with and burden the title to the Property in perpetuity and shall bind Grantor and all future owners and tenants of the Property.

B. Permitted Uses in General. This Easement is in gross, shall confine the use of the Property to activities such as are consistent with the express conservation purposes of this Easement, the terms of this Easement, and ecological study.

C. Dedication of Premises. Pursuant to the terms of applicable state code, the Property preserved by this Easement is declared to be open and natural land, and may not be converted or directed to any uses other than those provided for in this Easement.

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SECTION III - PERMITTED USES AND PRACTICES

The following uses and practices, are not inclusive of all permitted uses and practices, are illustrative of permitted uses and practices that are presently or may hereafter be recognized by and acceptable to the Grantee as being consistent with and in furtherance of the express purposes of this Easement, and, as such, these and other consistent uses and practices may not be precluded, prevented, or limited by this Easement.

A. Boardwalk. Installation of a boardwalk to minimize impacts of study and educational activities after consideration of the environmental impacts of such a boardwalk, and whose construction shall be minimally intrusive and consistent with the management plan.

B. Hazardous Tree Removal. Removal of hazardous trees or portions thereof, if as determined by Grantee, if there is imminent danger to life or property.

C. Implementation of Management Plan. Implementation of recommendations in the management plan to restore and/or maintain the health of native grasslands and riparian and aquatic habitats that ensure long-term sustainablitiy of priority elements.

D. Residual Rights. Except as expressly limited by this Easement, Grantor may exercise and enjoy all rights as owner of the Property, including the right to use the Property for any purpose not inconsistent with this Easement.

SECTION IV - NOTICE

A. Form. Whenever a provision is made under this Easement for giving any notice, the notice shall be deemed to have been given if personally delivered, with signed receipt, or mailed by the U.S. registered or certified mail, return receipt requested, addressed to the Party entitled to receive it at the address indicated below, or at another address provided from time to time. If either Party is required to obtain the other Party's prior written approval before performing any act or undertaking any enterprise, then the Party desiring to undertake any such act or enterprise shall not do so until the party has satisfied the notice provisions of this section and prior approval provisions of Section V herein.

B. Notice to Grantor: P.O. Box 670, Grass Valley, California, 95945, or to such other address as the Grantor may designate in writing.

C. Notice to Grantee: P.O. Box 2088, Nevada City, California, 95959, or to such other address as the Grantee may designate in writing.

SECTION V - PRIOR APPROVAL OF ACTIONS BY GRANTEE

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A. Grantor's Written Notice. Prior to the commencement of any activity, use, or enterprise which requires Grantee's approval, Grantor will notify Grantee in writing, as set forth in Section IV herein. Such notice must detail the timing, scope, methods and anticipated results of any proposed activity.

B. Grantee's Written Response. The Grantee shall have thirty (30) days from the date that it receives such notice, as indicated by the registered or certified return receipt, to review the proposed activity, use, or enterprise, and pursuant to the notice provisions set forth in Section IV herein, to notify Grantor of Grantee's approval of and/or any objections that Grantee may have to the proposed activity, use or enterprise. Objections, if any, shall be based upon Grantee's opinion that the proposed activity, use or enterprise is inconsistent with the purpose and/or provisions of this Easement. If, in the Grantee's judgment, the proposal set forth by Grantor can be modified to conform with the purposes and provisions of this Easement, then the same response shall inform Grantor of the manner in which the proposed activity can be modified to be consistent with this Easement. Except as provided in Paragraph C of this Section, Grantor can commence or conduct the proposed activity, use, or enterprise only if it receives Grantee's express written approval, and only in the manner explicitly proposed by Grantor and approved by Grantee.

In the event it is Grantee's opinion that the proposed activity is objectionable, based on the foregoing criteria, then, and in that event, Grantee shall make a good faith effort to advise Grantor how the proposal set forth by Grantor can be modified to conform with the purposes of the provisions of the conservation easement. The written response from Grantee shall then inform Grantor of the manner in which the proposed activity can be modified to be consistent with the conservation easement.

C. Grantee's Failure to Respond. If the Grantee fails to provide a written response, as provided under Section IV herein, to a written proposal properly sent to Grantee by Grantor, within thirty (30) days after Grantee receives the proposal, then the proposed activity, use or enterprise automatically shall be deemed consistent with the terms of this Easement, subject to the provisions set forth at Section XII(N) herein, and Grantee will have no further right to object to the activity described in the proposal.

D. Acts of God. Grantor will not be obligated to send any notice to Grantee, and Grantee will not be entitled to bring any action against Grantor, with respect to any reasonable and prudent activity undertaken by Grantor in a good faith effort to prevent, abate, or mitigate injury to the Property from fire, flood, storm, earth movement, acts of war, and similar causes beyond the control of Grantor.

SECTION VI - PROHIBITED USES AND PRACTICES

The Grantor states and agrees that the following prohibited uses and practices are not inclusive of all prohibited uses and practices, are illustrative of prohibited

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uses and practices that are presently or hereafter recognized by Grantee as being inconsistent with the purposes of this Easement and shall be strictly prohibited:

A. Introduction of non-native plant and animal species.

B. Erection or placement of any utilities, billboard, sign, fence or structure of any kind on, in or above the Property except with prior written approval by Grantee.

C. Deposition of any soil, trash, ashes, garbage, waste, landfill or any other toxic, noxious or objectionable material.

D. Excavation, dredging or removal of loam, gravel, soil, rock, sand or other material; building of any roads or trails; or any other change, temporary or permanent, in the general topography of the land, except with prior written approval by Grantee. Under no circumstance may any roadway or trail interfere with movement, nesting, forage or other normal activities and behaviors of animals on the Property or with the normal growth of plants on the Property as agreed upon by the Grantee.

E. Placement on, in or above the Property of advertising of any kind or nature whatsoever..

F. Activities, action or uses detrimental to water conservation, erosion control, soil conservation, or fish and wildlife habitat preservation as so determined by Grantee in its reasonable judgment..

G. Livestock grazing.

H. Construction of or placement of fences, except, with the prior written permission of Grantee, such fences as specifically have a maximum of four strands of smooth wire, a bottom wire no lower than 18 inches from the ground and an upper wire not higher than 421 inches from the ground.. No fences shall be built by Grantor on or over the Property in any event except within 2 feet of the Property boundary line or roadway edge. Under no circumstances may any fence interfere with movement, nesting, forage, and other normal activities and behaviors of animals on the Property or with the normal growth of plants on the Property.

I. Cutting, destroying, or removing trees, brush or other vegetation, except as necessary for public safety or the health of the Property as determined by Grantee and with the prior written approval by Grantee.

J. Construction or placement of any recreational facilities, including, but not limited to, picnic tables, campfire rings, barbecue facilities, camping accommodations, or sports fields, on the Property except with the prior written approval by Grantee and consistent with the approved Management Plan.

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SECTION VII - BREACH AND RESTORATION

A. Notice and Remedy. If a violation of any restriction contained in Section VI of this Easement, whether by Grantor or by a third party, comes to the attention of Grantee, Grantee promptly shall notify Grantor, as provided in Section IV herein, of such violation. Grantor shall have thirty (30) days after receipt of such notice to undertake actions, including restoration of the Property, that are reasonably calculated to swiftly correct or otherwise remedy the effects, impacts and or conditions caused by such violation. If Grantor fails to take such corrective action, within thirty (30) days, Grantee may at its sole discretion, undertake such actions, including appropriate legal proceedings, as are reasonably necessary to effect such corrections, and the reasonable cost of such corrections, including Grantee's expenses, court costs, and legal fees, shall be paid by Grantor, provided Grantor is determined to be responsible for the violation as finally judged by a court of competent jurisdiction..

B. Restoration. Grantor and the Grantee further intend that should Grantor undertake or cause to be undertaken any activity which requires the prior approval by Grantee without so obtaining such prior approval by Grantee in the manner specified herein, then Grantee shall have the right to force the restoration of the Property affected by such activity to a condition similar or equivalent to the condition that existed prior to the undertaking of such unauthorized activity, by restoring soils, replanting suitable domestic vegetation, or taking such other action as Grantee deems necessary to achieve restoration. In such case, the costs of such restoration and Grantee's expenses, including but not limited to costs of suit and legal fees, shall be borne by Grantor or those of its successors or assigns against whom a judgment is entered, or in the event that Grantee secures redress without a complete judicial proceeding, by Grantor or those of its successors or assigns who are otherwise determined to be responsible for the unauthorized activity. Nothing contained in this Easement shall be construed to preclude Grantor from exhausting its legal remedies in determining whether the proposed activity to which Grantee has objected is inconsistent with this Easement. The parties hereto covenant and agree that the obligation to restore the Property to its prior condition, as provided in this Section VII, may be enforced only against that party or parties who shall have caused such damage, including, but not limited to Grantor and the heirs, personal representatives, successors or assigns of Grantor.

SECTION VIII - REAL ESTATE TAXES

Grantor agrees to pay any and all real property taxes and assessments levied by any competent authority on the Property.

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SECTION IX - INDEMNITY

Grantor agrees to bear all costs of operation, upkeep and maintenance of the Property, and agrees to indemnify Grantee against all claims and obligations arising from such operation, upkeep, and maintenance activities.

SECTION X - ASSIGNMENT OF EASEMENT

Grantee may not transfer or assign its interest in the Property created by this Easement except to a "qualified organization" (within the meaning of Section 170 (h) (3) of the Internal Revenue Code) which is organized or operated primarily or substantially for one or more of the conservation purposes specified in Section 170 (h) (4) (a) of said Code. Any such "qualified organization" shall agree to enforce the conservation purposes protected by this Easement. Grantee agrees that it will make a reasonable effort in the event of any assignment to choose an assignee which is a qualified organization other than a governmental unit referred to in Section 170(c) (1) of the Code, which has conservation of natural resources as a substantial organizational purpose and provided further, that Grantee represents to the Grantor that its present intention is to assign its interest in this Easement only in connection with a dissolution of Grantee.

SECTION XI - BASELINE DATA

Grantee acknowledges that a preliminary inventory of biological resources and physical condition relating to the Property (the Baseline Data") has been completed by competent naturalists familiar with the Property. Copies of the Baseline Data are on file in the Grantee's offices in Nevada City, California. The Parties acknowledge that the purpose of the Baseline Data is to identify and document the condition of the Property as of the date of the execution of this Easement. In the event of a controversy arising with respect to the nature of the biological and/or physical condition of the Property, neither Party shall not be foreclosed from obtaining, producing or procuring any and all other relevant or material documents, surveys, reports and other information to assist in the resolution of such controversy.

SECTION XII - MISCELLANEOUS PROVISIONS

A. Amendment. Nothing in this Easement shall be construed to preclude Grantor from making a subsequent conveyance of rights in the property to further protect its conservation values, provided, however, that any such subsequent conveyance shall not impair any conservation purpose sought to be advanced by this Easement.

B. Binding Effect; No Third Party Benefits. This Easement shall be binding on all successors and assigns of both Parties and inure to the benefit of the respective successors and assigns of both Parties. Nothing in this Easement shall be

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deemed to create rights in or benefits for any third parties. Each assignee or purchaser must agree to be bound by the terms of this Easement.

C. Condemnation. If the easement is taken, in whole or in part, by exercise of the power of imminent domain, Grantee shall be entitled to compensation in accordance with applicable law.

D. Enforcement. Grantor intends that enforcement of the terms and provisions of this Easement shall be at the discretion of Grantee, and that Grantee's failure to exercise its rights under this Easement in the event of any breach of this Easement by Grantor shall not be deemed or construed to be a waiver of Grantee's rights under this Easement in the event of any subsequent breach.

E. Estoppel Certificates. Upon request by Grantor, Grantee shall within twenty (20) days execute and deliver to Grantor any lawful document, including an estoppel certificate, which certifies Grantor's compliance with any obligation of Grantor contained in this Easement and otherwise evidences the status of this Easement as may be requested by Grantor.

F. "Grantor" and Grantee". The terms "Grantor" and "Grantee", as used in this Easement, and any pronouns used in place thereof, shall mean and include the above-named Grantor, and its heirs, personal representatives, executors and assigns, and the Nevada County Land Trust, and its successors and assigns, respectively.

G. Liberal Construction. Any general rule of construction to the contrary notwithstanding, this Easement shall be liberally construed in favor of the grant to effect the purpose of appropriate California state code and the conservation purposes set forth above. If any provision in this instrument is found to be ambiguous, an interpretation consistent with the purpose of this Easement that would render the provision valid shall be favored over any interpretation that would render it invalid.

H. Partial Invalidity. If any provision of this Easement or the application of this Easement to any person or circumstance is found to be invalid, the remainder of the provisions of this Easement, and the application of such provisions to persons or circumstances other than those as to which it is found to be invalid, shall not be affected thereby.

I. Recordation. Grantee shall record this instrument in timely fashion in the official records of Nevada County, California, and may re-record it at any time as may be required to preserve Grantee's rights in this Easement.

J. Subsequent deeds. Grantor agrees that reference to this Easement will be made in any subsequent deed, or other legal instrument, by means of which Grantor conveys any interest in the Property (including any leasehold interest), and that a copy of this Deed of Conservation Easement will be attached thereto.

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K. Titles. Section and paragraph titles and subtitles are for convenience only and shall not be deemed to have legal effect.

L. Waiver of Certain Defenses. Grantor hereby waives any defense of laches, estoppel, or prescription.

M. Waiver of Rights. Any waiver of any of the terms hereof shall be enforceable only to the extent it is waived in a writing signed by the Party against whom the waiver is sought to be enforced. Any waiver shall be only effective for the particular instance for which it is granted and shall not constitute a waiver of a subsequent occurrence of the waived event not constitute a waiver of any other provision hereof, at the same time or subsequently.

IN WITNESS WHEREOF, Grantor and Grantee have executed this Easement on November 30 1999

GRANTORS:

Robert T. Roark, Trustee udt dated 4/13/84

John P. O'Brien, Trustee
John and Claire O'Brien Trust dated 3/30/95

Claire E. O'Brien, Trustee
John and Claire O'Brien Trust dated 3/30/95

GRANTEE:

NEVADA COUNTY LAND TRUST

Elizabeth S. Fry
President

NEVADA COUNTY LAND TRUST
Ronald Mathis
President

(final rev. 11/12/99)

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State of California

County of Nevada

ALL-PURPOSE ACKNOWLEDGMENT

On November 30, 1999 before me, D. Stewart

personally appeared Robert T. Roark, John P. O'Brien, Claire E. O'Brien and Elizabeth S. Fry

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

D. STEWART
Comm. #1092191
NOTARY PUBLIC - CALIFORNIA
NEVADA COUNTY
Comm. Exp. March 24, 2000

Signature

All Purpose Acknowledgment
1C4521CA (06/94)

~~END OF DOCUMENT~~

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STATE OF CALIFORNIA
COUNTY OF Nevada } SS.

On May 8, 2000 before me, the undersigned a Notary Public, personally appeared Ronald Mathis personally known to me (or proven to me on the basis of satisfactory evidence) to be the person(s)whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument. WITNESS my hand and official seal.

Signature D. Stewart

D. Stewart
Name (Typed or Printed)

Notary Public in and for said County and State

MGC1 D. STEWART COMM. # 1256809 NOTARY PUBLIC-CALIFORNIA NEVADA COUNTY COMM. EXP. MARCH 24, 2004 MGC1

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A portion of the lands situated in the County of Nevada, State of California conveyed by John L. Wilcox and Evangeline H. Wilcox, husband and wife, and Lee D. Roark and Dorothy A. Roark, husband and wife, to Robert T. Roark, Trustee U/D/T dated April 13, 1984 as to a 1/2 interest, and John P. O'Brien as to a 1/2 interest, by Grant Deed dated May 15, 1987 and recorded May 18, 1987, as File No. 87-13323 of Official Records of Nevada County, said lands being within the South half of Section 26, Township 16 North, Range 8 East, M.D.M., said portion being more particularly described as follows:

COMMENCING at a point from which the South one quarter corner of said Section 26 bears South 01° 25′ East 693.00 feet, said point being a corner on the Northerly line of that certain parcel of land conveyed to the State of California, by Deed recorded March 10, 1975, in Book 730, of said Official Records at Page 633, being also an angle point on the Southerly line of the lands described in said Grant Deed recorded as File No. 87-13323;
thence from said POINT of COMMENCEMENT along said Northerly and Southerly line North 89° 30′ 27″ East 516.02 feet to the TRUE POINT OF BEGINNING of the herein described parcel;
THENCE leaving said Northerly and Southerly line North 211.16 feet
thence North 80° 14′ 51″ East 89.48 feet;
thence South 81° 22′ 43″ East 270.59 feet;
thence North 20° 30′ 29″ East 200.00 feet;
thence South 69° 29′ 31″ East 111.05 feet;
thence North 89° 39′ 06″ East 312.77 feet;
thence South 87° 52′ 00″ East 167.90 feet;
thence North 81° 58′ 28″ East 165.06 feet more or less to the Easterly line of the lands described in said Grant Deed recorded as File NO. 87-13323;
thence along said Easterly line South 07° 56′ West 346.51 feet to the above referenced Northerly and Southerly line, said point being marked with a "T" rail on a North line of the Town Talk Placer Mine according to said Grant Deed recorded as File No. 87-13323;
thence along said Northerly and Southerly line South 89° 30′ 27″ West 1126.00 feet to the TRUE POINT OF BEGINNING.

The above described parcel contains 7.65 acres more or less.

This property description has been prepared by me, or under my direction, in conformance with the Professional Land Surveyor's Act.

Jerome P. Klopotek
L.S. 4301 Exp. 6/30/00

LICENSED JEROME P. KLOPOTEK LIC. No. 4301 STATE OF CALIFORNIA

EMPIRE MINE S.H.P.
9/2/99
O'BRIEN TO LAND TRUST
CONSERVATION EASEMENT

Page 1 of 1

END OF DOCUMENT

Attachment 3
Bennett Street Conservation Easement Photos





Attachment 3 Photos





Attachment 3 Photos

GROUP LETTER 2: ERIN TARR, BEAR YUBA LAND TRUST

Response to Comment Grp 2-1

This is an introductory comment and does not provide a comment on a specific environmental issue associated with the project. Comment noted.

Response to Comment Grp 2-2

This is an introductory comment recognizing the existence and location of the Bennett Street Grasslands conservation easement and does not provide a comment on an environmental issue associated with the project; rather, the comment expresses general concerns regarding the project's impacts to the 7-acre Bennett Street Grasslands Conservation Easement. The commenter provides specific concerns in the following sections of the letter. Please see the below responses to comments.

Response to Comment Grp 2-3

This is an introductory comment outlining the commenter's legal obligations to the Bennett Street conservation easement and generally expresses concern that the DEIR does not recognize the conservation easement in the environmental setting and land use sections. The commenter is correct that the Bennett Street conservation easement is not specifically identified in the DEIR, but incorrectly assumes this means impacts to surrounding land uses were not analyzed. The DEIR addresses impacts to surrounding receptors and land uses where appropriate and dependent on the specific resource analysis. For example, the aesthetics analysis analyzes impacts to the surrounding viewshed through visual simulations from those viewpoints. The hydrology analysis looks at both groundwater impacts to surrounding well owners and impacts associated with discharge to South Wolf Creek on the water quality and sedimentation. In addition, the biology section analyzes impacts to transitory species such as birds, raptors, and other wildlife that could exist in the region. As a result, the DEIR correctly analyzes the proposed project's impacts on the environment and is not required to analyze how the project may affect legal obligations of surrounding landowners. The commenter also does not explain how the project conflicts with any of the listed policies.

Regarding the commenter's concerns about the project's potential to impact the water quality and quantity in South Wolf Creek, please see Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Response to Comment Grp 2-4

The commenter raises various general comments regarding certain special-status and migratory species that may be impacted by the project and the potential for offsite impacts due to South Wolf Creek discharge. The commenter does not offer evidence of any specific impact, but speculates that an impact could result. However, as stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Please see Master Response 37 - Birds and Raptors, addressing general comments concerning the olive-sided flycatcher (*Contopus cooperi*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechia*). Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding impacts to amphibian species. Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water

Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Regarding benthic macroinvertebrates, please see Response to Comment Grp 31-12.

Response to Comment Grp 2-5

The Bennett Street Grasslands are located in "Reach D" of the geomorphic assessment for South Fork Wolf Creek. Proposed discharge from the project to South Fork Wolf Creek would range from 1.9 cfs to 5.6 cfs. As shown in Table 5.5 of Appendix K.1 of the DEIR, an increase from 2 cfs to 6 cfs (4 cfs increase) would increase the depth of water from approximately 0.69 ft to 0.91 ft (2.6 inches increase in depth). At 10 cfs the max depth is estimated at 1.09 feet. The discharge would result in a minor increase in water depth and total water depth would be less than a "bank full" event which is estimated at a depth of approximately 1.3 ft for Reach D (See Table 5.1 of Appendix K.1). Bankfull is a term used to characterize the channel dimensions of the channel under the most frequent flows (between a 1- and 2-year flood) identified by change in bank slope, vegetation, or absence and presence of sedimentation. The high-water mark depth for Reach D is approximately 5.6 feet (See Table 5.1 of Appendix K.1). The project would not result in water levels in the Creek exceeding a normal bankfull event or flooding outside of the creek channel and therefore would not affect vegetation adjacent to the creek or interrelated habitat. A series of master responses have been prepared to address potential impacts associated with treated water discharge into South Wolf Creek. Please see:

- Master Response 36 - Flows in South Wolf Creek and Wolf Creek,
- Master Response 32 - Temperature of Mine Water Discharge,
- Master Response 35 - Discharge to South Wolf Creek, and
- Master Response 33 - Groundwater Dependent Vegetation

Response to Comment Grp 2-6

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged, and analyzed in the DEIR impact analysis (see Section 4.4.4), that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including preconstruction surveys and agency permitting. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it would be less than significant. The commenter does not raise any specific impact that would be caused by the project, but speculates that impacts could result. CEQA does not require analysis of speculative impacts. (CEQA Guidelines Section 15384.)

In addition, the commenter identifies South Fork Wolf Creek as a vital wildlife movement corridor that could be affected by changes in water quantity and quality. For these concerns, please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. It is also noted that DEIR Impact 4.4-3 requires the preparation of aquatic resources management plans that will mandate setbacks and other requirements to minimize

impacts to Wolf Creek, South Fork Wolf Creek, and surrounding habitat, which is consistent with General Plan Policy 13.1 (i.e., retain non-disturbance open space to promote continued viability of contiguous or inter-dependent habitats by avoiding fragmentation of existing habitat areas and preserving movement corridors between related habitats). Draft management plans were included as Appendices F.5 and F.8.

Response to Comment Grp 2-7

The commenter asserts that there is no surface water quality baseline data presented in the DEIR. However, this is incorrect, as sampling was performed within South Fork Wolf Creek (See Master Response 35 – Discharge to South Fork Wolf Creek) to ascertain existing water quality in the creek. The commenter requests that specific samples be taken from South Fork Wolf Creek to establish baseline water quality; however, as discussed above, sufficient sampling has already been conducted to analyze the project's potential water quality impacts.

Response to Comment Grp 2-8

The commenter asserts that the DEIR Project Description did not provide enough detail on how water discharged into South Fork Wolf Creek would not cause a significant impact to water quality. However, the Project Description is not the portion of the DEIR that analyzes project impacts; rather the project's potential water quality impacts are analyzed in detail in Chapter 4.8 of the DEIR. As discussed in great detail in Chapter 4.8 of the DEIR, the project may have a potentially significant impact on water quality and therefore Mitigation Measure 4.8-1(a) is required to address these potential impacts. This mitigation measure requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that the water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals.

Please see Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek.

The commenter states that there is substantial evidence showing that the creek's water quality would be adversely affected by the project-generated surface water run-off and that total maximum daily load (TDML) was not used to measure this project impact. The commenter does not provide this substantial evidence, specify what surface runoff would affect the creek's water quality, or the commenter's definition of TDML and how the project impact would be measured and analyzed by TDML. In regard to surface water runoff from engineered fill, please see Master Response 8 - Mine Waste Characterization. Mitigation Measures 4.8-1(b) and 4.8-1(c) require Construction and Industrial Stormwater Pollution Prevention Plans (SWPPP). As discussed in Chapter 4.8 of the DEIR and stated on page 4.8-49 of the DEIR, SWPPP would address any activities that would have the potential to release pollutants to stormwater, including material and chemical storage, vehicle operation and maintenance, and material handling and transport.

Response to Comment GRP 2-9

DEIR Section 4.8.4, Impact 4.8-1, analyzed the proposed project's impacts on water quality and determined project construction could result in a potentially significant impact. The DEIR requires a construction stormwater prevention and pollution plan as Mitigation Measure 4.8-1, which reduces the impact to a less than significant level. The County has a mitigation monitoring and

reporting program included with the Final EIR, which will allow the County to have monitoring and enforcement authority over project mitigation and conditions of approval. The commenter's assertion that the applicant would fail to comply with the storm water pollution prevention plan is speculative, and CEQA does not require analysis of speculative impacts. Moreover, the County and RWQCB have enforcement authority over the mine operator's implementation of the SWPPP.

Response to Comment Grp 2-10

The commenter points to the League to *Save Lake Tahoe Mountain Area Preservation Foundation v. County of Placer* (2022) 75 Cal.App.5th 63, court decision to support its assertion that the DEIR is inadequate. Specifically, the commenter asserts that the DEIR does not provide adequate baseline description, methodology, cumulative impacts analysis and adequate mitigation measures. The environmental baseline is provided in extensive detail in each resource section of the DEIR; cumulative impacts are analyzed throughout the DEIR for each resource area; and the DEIR includes numerous mitigation measures designed to reduce impacts where feasible. The present project is distinguishable from the project in the cited case, and the commenter provides no specific example of how they are similar.

Response to Comment Grp 2-11

The commenter states that a combination of Alternative 2 and Alternative 4 should be considered, which would eliminate placement of fill material on the Centennial Site but also reduce extraction as proposed in Alternative 4. Section 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. The Alternative proposed by the commenter is not anticipated to eliminate any of the significant impacts of the project, and would also lessen the project's benefits by reducing employment and making the project less financially feasible.

Response to Comment Grp 2-12

Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 2-13

The comment generally summarizes the content of the letter. Please see Responses to Comments Grp 2-2 through Grp 2-12. Please also see Master Response 1 - Non-EIR/Administrative Issues.

Group Letter 15

March 31, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller and Hardy Bullock:

As Board Directors, entrusted with the representation of over 8,000 BriarPatch Co-op owner-members, we are writing to express our opposition to the proposed reopening of the Idaho-Maryland Mine by Rise Gold Corp.

Grp 3-1 BriarPatch is driven by Ends Policies which include environmental stewardship, a stronger local food system, and a community-focused healthy workplace. We are deeply committed to improving the quality of life for our shoppers and staff. Rise Gold plans and their Draft Environmental Impact Report contain several troubling aspects that are counter to these unwavering values.

Grp 3-2 This project is expected to use 12% of Nevada County's electrical supply, more than all the rest of the County's businesses combined. We have worked hard as an organization toward a net zero energy goal and are inspired to see the county reduce their carbon footprint as well. This would erase all gains made toward that end. Additionally, with PSPS and catastrophic weather events, we question the judgement of one single business using so much energy, thus compromising the grid.

Grp 3-3 With an alarming drought, there are serious concerns about our watershed. The Co-op has implemented strategies that have saved an average of 150,000 gallons each month. Rise Gold plans on pumping more than a million gallons a day for decades. Further, we are very concerned about

Grp 3-4 arsenic, ammonia, and other contaminants from treated mine wastewater polluting downstream irrigation water and prohibiting farm use. Self-monitoring of water quality is not a high enough bar for Rise Gold, especially given the track record of the company's CEO.

Grp 3-5 Air quality is another major concern, especially during peak fire season. Rise Gold's 'dump site' is just a mile from the Co-op's front door and there will be atmospheric exposure to employees, as well as shoppers. The safety of our staff is of the highest priority. Our owner-members are very health conscious and we do not want their shopping experience polluted.

Grp 3-6 As you review public comments on this issue, we urge you to consider what is best for the quality of life for the residents of this community. We ask that you vote against approval of the mine, affirming your contract with your constituency that you are acting in the best interest of all.

BriarPatch Food Coop * 290 Sierra College Drive * Grass Valley CA 95945

Sincerely,

Alana Lucia, Board President

Rachel Berry, Board Vice-President

Katie Ivy, Board Secretary

Mark Fenton, Board Treasurer

Kwong Chew, Board Director

Jonathan Collier, Board Director

Kali Feiereisel, Board Director

Richard Drace, Board Director

Alan Weisberg, Board Director

Cc: Nevada County Planning Commission (Suite 170)

BriarPatch Food Coop * 290 Sierra College Drive * Grass Valley CA 95945

GROUP LETTER 3: MARY HUNTER, BRIARPATCH FOOD CO-OP

Response to Comment Grp 3-1

The commenter's opposition to the proposed project is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 3-2

This commenter is concerned with the electrical power usage associated with the project and that it would negate progress towards net-zero energy goals. The commenter is also concerned with Public Safety Power Shutoffs (PSPS) and catastrophic weather events.

The commenter is correct that the proposed project would create new demand for energy resources. However, the threshold for significance for energy impacts established by CEQA Guidelines Appendix G is not whether a project would use energy, but whether a project would use energy in an inefficient or wasteful manner. The DEIR's discussion of Impact 4.3-4 summarizes the various measures that would be implemented to reduce the project's energy demand including the use of high-efficiency off-road equipment, the use of Tier 4 Final compliant engines for emergency generators, and fleet compliance with federal and state fuel efficiency standards. (DEIR, p. 4.3-86–88.) The DEIR concludes that implementation of these measures would ensure that the project does not result in the inefficient or wasteful use of energy and the impact would be less than significant. Please also see Response to Comment Agcy 8-17. Furthermore, Impact 4.3-10 determined that the project would not conflict or interfere with any State adopted plans for renewable energy production or energy efficiency. (DEIR, p. 4.3-88–90.)

CEQA Guidelines Appendix G also determines the significance of impacts based on whether a project requires or results in the relocation or construction of new or expanded electrical power facilities. (DEIR, p. 4.11-19.) The DEIR found that impacts related to requiring the relocation or construction of new or expanded electrical power facilities would be less than significant. (DEIR, p. 4.11-31.) The electrical grid system in the project area is well developed and PG&E has provided a will serve letter for the project. (DEIR, p. 4.11-35.) The commenter provides no evidence to support its statement that the project would "compromise" the electrical grid.

The portion of the comment regarding the potential for catastrophic weather events to compromise the power-grid does not address the adequacy of the DEIR and does not warrant further response but is noted for the decisionmakers.

Response to Comment Grp 3-3

This comment expresses concern regarding the area's watershed and the project's anticipated water demands in light of the drought that California is experiencing.

Regarding the project's anticipated water demands for both potable and non-potable uses, the DEIR found that there are sufficient water supplies available to serve the proposed project as well as existing and reasonably foreseeable future development during normal, dry, and multiple dry years and that the project's impacts to water supplies would be less than significant. (DEIR, p. 4.11-43). The DEIR evaluates the project's potential impacts on groundwater resources (see Impact 4.8-2 on DEIR pages 4.8-54 through -68) and concludes that with implementation of Mitigation Measures 4.8-2(a) through 4.8-2(c), impacts to groundwater supplies would be less than significant. The DEIR further evaluates the sufficiency of available water supplies to meet

the project's demands (see Impact 4.11-7 on DEIR pages 4.11-35 through -43) and concludes that available supplies would be sufficient, and no mitigation is required.

Response to Comment Grp 3-4

The commenter is also concerned with contaminants in the treated mine wastewater and that self-monitoring is insufficient given the "track record of the company's CEO."

Please see Master Response 35 regarding the discharge to South Fork Wolf Creek. The DEIR found any impacts associated with violation of any water quality standard or waste discharge requirements would be less than significant after mitigation. (DEIR, p. 4.8-41.) Impact 4.8-1 in the DEIR addresses the potential for project wastewater to contain elevated levels of relevant contaminants. (DEIR, p. 4.8-41–53.) The DEIR acknowledges that the "proposed project's construction and operations involve multiple activities that could result in adverse effects to water quality." (DEIR, p. 4.8-51.) However, the project's "proposed water management and treatment, and adherence to permit requirements [of the RWQCB] would avoid significant impacts to water quality…" (DEIR, p. 4-8.51.) The DEIR describes the specific requirements for regulatory compliance in Mitigation Measures 4.8-1(a) through 4.8-1(e). Coverage under the Limited Threat Discharge permit would require ongoing water quality sampling and testing, with oversight by the RWQCB, to demonstrate that the proposed water treatment plant is successfully treating mine water to meet the water quality standards and treatment goals of the permit. All samples, data and analysis would be verified and evaluated by qualified RWQCB staff, and the RWQCB would have enforcement authority.

While comments related to the CEO of the Project Applicant are not relevant for CEQA purposes, this topic is addressed in Master Response 3 – Operator Responsibility.

Response to Comment Grp 3-5

The commenter is concerned with the air quality impacts of the project, especially during peak fire season.

The DEIR addresses potential air quality impacts of the proposed project in Chapter 4.3, "Air Quality, Greenhouse Gas Emissions, and Energy" and found that impacts associated with air quality would be less than significant after mitigation. (DEIR, 4.3-66, -78, -84.) Specifically, Impact 4.3-2 addresses the potential to expose sensitive receptors to substantial pollutant concentrations. (DEIR, 4.3-78–84.) The DEIR concludes that "project-related CO emissions would not exceed the one-hour or eight-hour thresholds, and, as such, the project would not expose sensitive receptors to excess concentrations of CO." (DEIR, p. 4.3-82.) The DEIR further demonstrates "that emissions of [toxic air contaminants] would not result in health risks to nearby receptors in excess of NSAQMD thresholds. Furthermore, criteria pollutant emissions from project construction, operations, and reclamation would not expose receptors to substantial concentrations of pollutants." (DEIR, p. 4.3-82.) Mitigation Measure 4.3-2 addresses the potential for exposure to existing levels of asbestos in project site fill materials by requiring development and implementation of an Asbestos Dust Mitigation Plan. (DEIR, p. 4.3-82.) With implementation of this mitigation measure, the impacts to air quality would be less than significant. Please also see Master Response 18 - Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds during Operations.

Response to Comment Grp 3-6

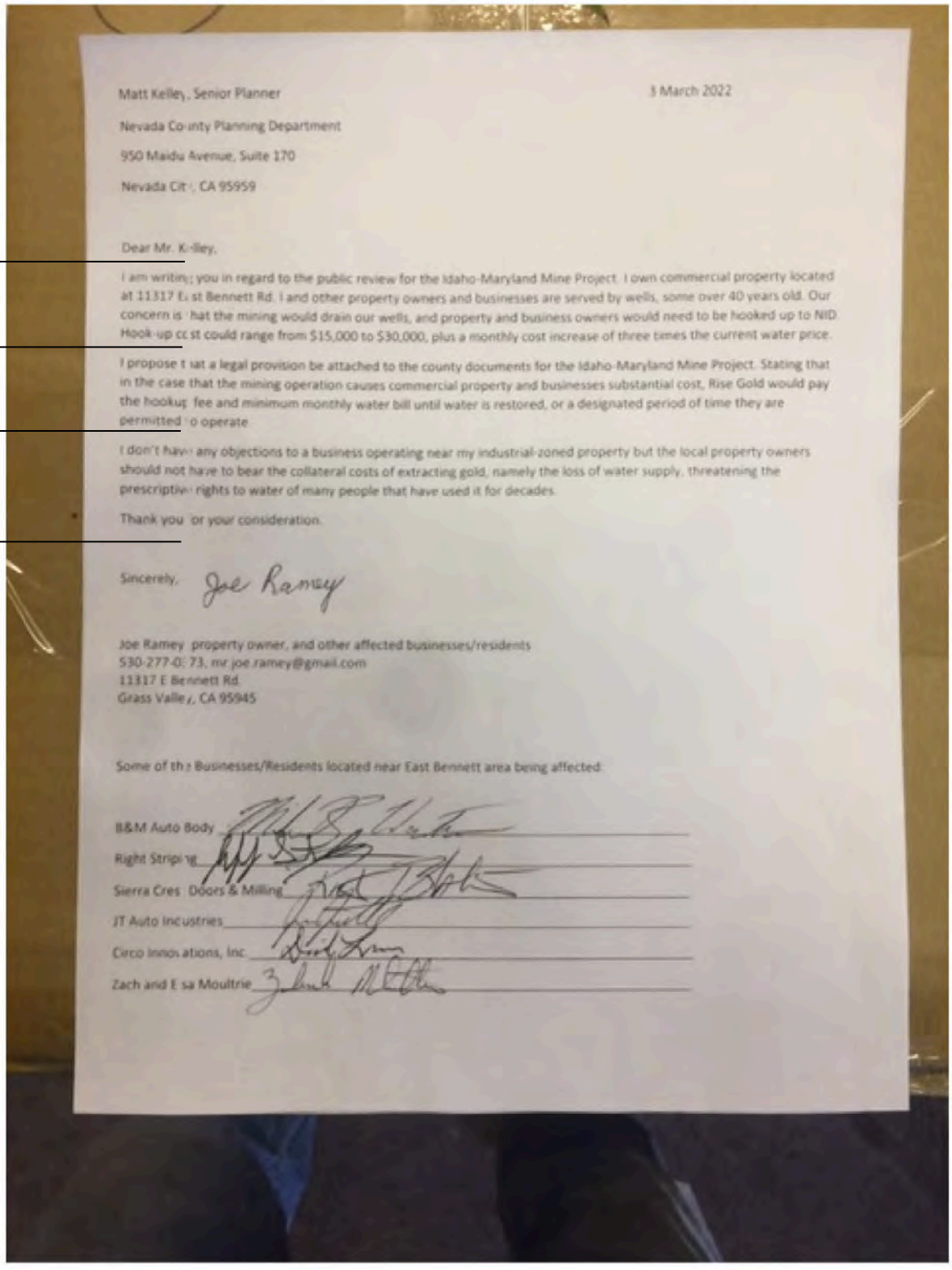
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Group Letter 4

Grp 4-1

Grp 4-2

Grp 4-3



Matt Kelley, Senior Planner

3 March 2022

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959

Dear Mr. Kelley,

I am writing you in regard to the public review for the Idaho-Maryland Mine Project. I own commercial property located at 11317 East Bennett Rd. I and other property owners and businesses are served by wells, some over 40 years old. Our concern is that the mining would drain our wells, and property and business owners would need to be hooked up to NID. Hook-up cost could range from $15,000 to $30,000, plus a monthly cost increase of three times the current water price.

I propose that a legal provision be attached to the county documents for the Idaho-Maryland Mine Project. Stating that in the case that the mining operation causes commercial property and businesses substantial cost, Rise Gold would pay the hookup fee and minimum monthly water bill until water is restored, or a designated period of time they are permitted to operate.

I don't have any objections to a business operating near my industrial-zoned property but the local property owners should not have to bear the collateral costs of extracting gold, namely the loss of water supply, threatening the prescriptive rights to water of many people that have used it for decades.

Thank you for your consideration.

Sincerely, Joe Ramey

Joe Ramey property owner, and other affected businesses/residents
530-277-0[illegible]73, mr.joe.ramey@gmail.com
11317 E Bennett Rd.
Grass Valley, CA 95945

Some of the Businesses/Residents located near East Bennett area being affected:

B&M Auto Body

Right Striping

Sierra Cres Doors & Milling

JT Auto Industries

Circo Innovations, Inc

Zach and Elsa Moultrie

GROUP LETTER 4: JOE RAMEY, BUSINESS OWNERS (MULTIPLE SIGNATURES)

Response to Comment Grp 4-1

The commenter owns property near the project site and is concerned that the dewatering of the mine will impact the groundwater well service the property. Water wells in this area (E. Bennett Industrial Area) have been evaluated in the DEIR and are predicted to experience minimal drawdown of 1 to 2 feet from mine dewatering (see page 79 of Appendix K.2) and no mitigation for these properties is proposed. However, if groundwater monitoring during the initial dewatering determines that mitigation is required for these properties, the Project Applicant would be required to fund the associated costs to connect to NID. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 4-2

The commenter requests that the Project Applicant be required to pay any costs associated with the connection to NID in the event a property's groundwater well is impacted. The mitigation measures for the project already specify the requirements for the applicant to fund any necessary well mitigation. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 4-3

The commenter states that nearby property owners should not have to pay the connection cost to NID as a result of the project. The commenter is referred to Response to Comment Grp 4-1.

Group Letter 5

California Native Plant Society

Redbud Chapter CNPS

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

Via email: Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

Thank you for the opportunity to comment on the Draft Environmental Impact Review for the Idaho Maryland Mine.

This letter, submitted on behalf of the California Native Plant Society and its local Redbud Chapter, is focused on the flaws in the DEIR relating to Biological and Aquatic Resources for the Centennial and Brunswick sites.

I. The DEIR's use of a project definition that excludes the Centennial Cleanup violates CEQA.

Grp 5-1

The DEIR fails to meet CEQA requirements by omitting the cleanup in its analysis of impacts. Because the preparation for reopening and subsequent operation of the IMM cannot proceed without the cleanup, the two constitute a single project for the purposes of CEQA and their environmental impacts must be analyzed together.

The *Guidelines for Implementation of the California Environmental Quality Act* define the term "project" broadly: "'Project' means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: ... (3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies." 14 CCR Sec. 15378 (a).

The DEIR has excluded the cleanup of the Centennial site and improperly defined the Idaho Maryland Mine "project" as everything but the cleanup plan that is currently under review by

the Department of Toxic Substances Control ("DTSC"). This is contrary to CEQA: "The term 'project' refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. *The term 'project' does not mean each separate governmental approval.*" 14 CRR Sec. 15378 (c) (Emphasis added.)

CEQA's broad definition of "project" is intended to prevent "a proponent or a public agency from avoiding CEQA requirements by dividing a project into smaller components which, when considered separately, may not have a significant environmental effect. ..." *Nelson v. County of Kern*, 190 Cal. App. 4th 252 (2010).

In *Nelson*, the Federal Bureau of Land Management had conducted an environmental review of a request for a permit for a surface mining operation and had issued the permit. Kern County then limited its review to a consideration of whether it should approve the reclamation plan for that mine. The Appellate court concluded that the County was required to review "*both* the mining operations and the reclamation plan. Both aspects were integrally related and constituted the whole of the action or the entire activity for which approvals were being sought. ... [T]he reclamation plan was simply the final phase of the overall usage of the land proposed by [the applicant] ... ." 190 Cal. App. 4th 272.

Here, the cleanup is "simply the [first] phase" of the land usage; the mine and the cleanup are "integrally related" and constitute "the entire activity for which approvals [are] being sought."

In treating the cleanup as "separate," the DEIR focuses on "isolated parts of the whole" of the IMM project, "overlooking" and distorting its cumulative impacts and failing to inform the public and decision makers of significant environmental impacts. In so doing, it thwarts the purposes of CEQA. *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136, 1144.

This flaw – excluding the Centennial site cleanup from the DEIR's CEQA review – is inherent in the original Notice of Preparation ("NOP") issued July 17, 2020. The NOP declares that that the "project applicant" is working with DTSC to clean up the Centennial site "*separate from the proposed project.*" (Emphasis added) (NOP p. 5)

After declaring the cleanup to be "separate" from the mine, the NOP describes the mine project in such a manner that it is clear the mine is dependent on the cleanup, not a separate project. Thus, the Centennial site "currently cannot be developed" because of contamination caused by historic "deposition of mine tailings on the site" (NOP p. 5), but the IMM will nonetheless (1) use the Centennial site (after the cleanup) for depositing 1.6 million tons of *additional* mine waste, and (2) reclaim the Centennial site for reuse or sale after the mine closes 80 years later.

Specifically, the NOP Site Plan for the Centennial Site calls for 44 acres of the 56-acre site to be buried in new mine waste *after* the cleanup. (NOP p. 2; see also NOP Figure 7, "Site Plan – Centennial Industrial Site") ("Attachment A.") This same Figure is later used in the DEIR (Chapter 3, Page 3-16, Figure 9, "Site Plan").

In addition, the "reclamation plan" described in the NOP notes that after the closure of the mine, the Brunswick and Centennial "fill slopes would be revegetated with an erosion-control seed mix to reduce erosion and maintain fill slope stability. The fill pads would be maintained until they are used or sold for future industrial purposes." (NOP p. 9; see also DEIR Chapter 3, pp. 3-42, 3-46 and 3-47.)

Clearly, neither the dumping of 1.6 million tons of additional mine waste on the Centennial site nor the reclamation of land "to be used or sold for future industrial purposes" after the mine closes is possible without the cleanup. There is no basis whatsoever for the County to claim the cleanup is a "separate" project.

Such a separation of the mine project into arbitrary segments is explicitly forbidden by CEQA. Accordingly, the County's assertion that the cleanup is a "separate project" clearly must fail. The separation of the cleanup from the mine is artificial and misleading.

II. The CEQA Review of the Cleanup and the Mine Reopening Must Encompass the "Whole Project" and Must Not be Segmented or Reviewed in a "Piecemeal" Manner.

Under CEQA, "a project must not be broken into smaller parts, each of which alone might qualify for a Negative Declaration, in an attempt to avoid preparing an EIR." Mitigated Negative Declarations, CEQA Technical Advice Series, California Office of Planning and Research, p.2 *https://opr.ca.gov/docs/MND_Publication_2004.pdf. See also Association for Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal. App.3d 151.

"CEQA forbids 'piecemeal' review of the significant environmental impacts of a project." *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1358. Agencies cannot allow "environmental considerations [to] become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." *Bozung v. Local Agency Formation Com* (Cal. 1975) 13 Cal.3d 263, 284 (superseded by statute on other grounds).

The California Supreme Court set forth a piecemealing test in *Laurel Heights Improvement Assn. v. Regents of University of California* (Cal. 1988) 47 Cal.3d 376. "We hold that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Laurel Heights*, 47 Cal.3d 376, 396.

There may be improper piecemealing when the reviewed project legally compels or presumes completion of another action. (*Nelson v. County of Kern* (2010) 190 Cal.App.4th 252, 272 [When reviewing a reclamation plan, the County should have included mining operations

that necessitated it]; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 732 [32 Cal.Rptr.2d 704] [EIR for residential development should have included sewer expansion that was a "crucial element" of development].

Here, the cleanup and the mine reopening application are part of one project requiring a single EIR. The same proponent, Rise Gold, dba Rise Grass Valley (RGV), sponsored the RAP and is also the applicant for the mining permit. The completion of the RAP is a prerequisite to the mine reopening, and the DEIR "presumes" the approval and completion of the RAP. The County has used the separate RAP review not only as a basis to disregard the wetlands and other biological resources at the Centennial site, but also as a tactic to justify using a hypothetical future "adjusted baseline" in the DEIR to avoid any assessment of the true environmental impacts of the mine.

The cleanup has been treated as a separate project even though it is on the same property as the Mine Project, with the same aquatic resources and environmental issues, and despite the fact that the mine cannot be reopened and operated without the cleanup.

Instead, the DEIR conveniently wipes the wetlands off the map. See, for example, DEIR Chapter 4.4 Biological Resources page 4.4-12, Figure C "IMM Project Baseline after DTSC Cleanup" which includes a blank 28-acre area labeled "Clean-up Area – DTSC Project." (Attachment "B")

The separation of the review of the cleanup from the mine project has enabled the County, with the aid of the DTSC, to attempt to evade any meaningful evaluation of the cumulative environmental impacts of the cleanup and the mine on the wetlands, riparian areas, and other important natural resources of the Centennial Site.

The fact that these two environmental reviews are taking place in tandem has obscured the impacts of the mine on aquatic and other biological resources at the Centennial site. The DEIR reflects the fundamental defects of this process; it omits any assessment of major environmental impacts on the Centennial site.

The results of this fragmented process include a DEIR that denies the existence of any protected wetlands and riparian areas at the Centennial site, premised on a flawed draft RAP that has not been approved.

Indeed, if the DEIR and RAP are approved in their current forms, the protected Centennial aquatic resources will be destroyed without any evaluation of environmental impacts. This is a textbook case demonstrating why CEQA policy prohibits "piecemeal" review. The Centennial Site and the Mine project are a single "project" and must be reviewed as such under CEQA. *See Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222.

III. The County Improperly defers to DTSC's review of the cleanup as proposed in Rise Gold's Remedial Action Plan (RAP) in its MND.

Instead preparing its own EIR for the cleanup (as part of this DEIR), the County is deferring to the DTSC's use of a Mitigated Negative Declaration ("MND") process to review the cleanup plan. This amounts to splitting the analysis of the IMM project's environmental impacts across two types of environmental review documents, which is prohibited by CEQA.

The California Court of Appeals in *Farmland Protection Alliance v. County of Yolo* 71 Cal. App. 5th 300 (2021) reaffirmed that "'once evidence is presented that a project might have a substantial impact on the environment -- in any area -- the lead agency *must* proceed to prepare an environmental impact report *'for the proposed project.'* " (Citing *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372.)

An MND is appropriate only if there is no substantial evidence that a project might have a significant effect on the environment. *(Pub. Res. Code Section 21064.5).* Here, there is clearly substantial, indisputable evidence that the mine project "might have a significant effect on the environment." One specific example is the cleanup's environmental impact on the Centennial site wetlands and streams. This substantial evidence was presented during the DTSC process, and in the DEIR (including Appendices) itself.

Grp 5-2

The June 19, 2020, *Technical Memorandum for Centennial Industrial Site: Remedial Action Plan Project – Biological Resources Impact Assessment* submitted as part of the DTSC MND review shows that 4.35 acres of the 4.37 acres of mapped wetlands and .19 acres of the .6 acres of mapped streams would be "impacted" by the cleanup project (See p. 7, Tables 3.0 and 4.0 of the Technical Memorandum). At page 13, it is made clear that the wetlands will cease to exist: "Disturbance within the Centennial Industrial Site from the implementation of the RAP Project is estimated to fill a maximum of 4.35 acres of mapped wetlands and 0.19 acres of intermittent and ephemeral streams within the Centennial Industrial Site."

Thus, the plan is to dredge and fill essentially ~~all of~~all the wetlands and almost 30% of the mapped streams on the property. These impacts clearly constitute "significant environmental impacts."

Circulated for comment in July, 2021, the DTSC's draft MND and Draft Final Remedial Action Plan ("RAP") offered no alternatives that would preserve any of the mapped wetlands on the Centennial site. Instead, the plan is to use over 129,000 cubic yards of soil from these *uncontaminated* wetlands and streams as *clean fill* to "cap" and backfill the contaminated areas being remediated. See green dotted line surrounding wetlands on the "Overview of Proposed Remedial Action" map of the Centennial area (RAP Fig. 5). (Attachment "C") This area matches the outline of the "Clean-up Area – DTSC Project" on Attachment B. None of the alternative cleanup plans considered by the RAP called for using offsite sources of "clean fill" so that these wetlands could be preserved. Instead, they are to be destroyed.

Numerous comments on the MND and RAP were submitted, by Redbud CNPS and others, specifically challenging the failure to include the cleanup as part of the DEIR and presenting substantial evidence that the cleanup project as proposed could (and would) have significant environmental impacts in several areas.

Several comments also challenged the failure to consider alternatives that would preserve any portion of the wetlands. The DTSC is still reviewing the draft RAP and consulting with legal counsel, and has not approved the cleanup plan, or selected any of the alternative options described in the draft MND.

Yet the County's DEIR continues to attempt to sever the cleanup from the mine. The January 29, 2021 DEIR Appendix F-3, "Updated Technical Memorandum for Centennial Industrial Site: Idaho-Maryland Mine Project – Biological Resources Impact Assessment" notes in passing the mapped wetlands and streams at the Centennial Site mentioned above, then dismisses them as part of the so-called "separate" cleanup.

"The environmental cleanup work at the Centennial Industrial Site will be completed under the DTSC voluntary cleanup program and is outside the scope of the IMM Project. It is estimated that the cleanup program will cause a surface disturbance of 26.56 acres ... which will incorporate impacts to approximately 4.35 acres of mapped wetlands and 0.19 acres of mapped streams within the Centennial Industrial Site. Therefore, the impacts and associated mitigation of approximately 4.54 acres of wetlands and streams within the Centennial Industrial Site will be incorporated into the DTSC voluntary cleanup project and is outside the scope of the IMM Project." DEIR Appendix F-3 p. 2.

The above statement makes it clear that there will be no remaining wetlands to protect or mitigate on the Centennial site *because the wetlands will no longer exist.* If the plan were to retain any existing wetlands, or to restore or recreate wetlands elsewhere on the site, the DEIR would be required include them in the Updated Technical Memorandum and in the Centennial aquatic resources management plan. It does not.

As noted previously, maps of the on-site Centennial "borrow areas" (the designated sources of the 129,100 cubic yards of "clean fill") make it clear that the fill *will be taken from wetlands and riparian areas, not from other uncontaminated areas of the site.* (See, e.g., Attachment C)

CEQA requires that options to avoid and minimize adverse impacts to uncontaminated wetlands be considered and adopted, unless the impacts are unavoidable. Here, the adverse impacts can be avoided and there are alternatives. Clean fill can be brought in from off-site, or from other areas of the Centennial site, and *the uncontaminated wetlands and riparian areas can be preserved.*

Neither DTSC's Final CEQA Initial Study or the DEIR addresses adverse impacts to the wetlands caused by the cleanup, and there is no analysis of how such impacts can be minimized or avoided.



Instead, the Centennial Biological Resources Impact Assessment (Nov. 12, 2019) states that the mine project *"would have no impact on mapped wetlands within the Centennial Industrial Site* given that *any fill or dredge of mapped wetlands ... will occur as part of the site remediation project approved through DTSC prior to the development of the IMM Project."* P. 5. (Emphasis added.) In other words, there will be no wetlands left after the cleanup, so the EIR for the mine project is not required to identify, analyze, or mitigate any adverse environmental impacts to wetlands.

Thus, the DEIR itself, as well the DTSC MND for the RAP, includes substantial evidence that many aspects of the Centennial cleanup project mandate preparation of a full DEIR. As lead agency, the County cannot ignore that evidence. The County must prepare a new DEIR that analyzes the impacts of the project in its entirety, including both the cleanup and the mine construction and operations.

IV. The DEIR Fails to Establish an Appropriate Environmental Baseline

An EIR is required to describe the baseline physical conditions on the project site which the lead agency will use to determine whether an impact is significant. (CEQA Guidelines, §15125(a)(1)). An EIR is deficient when it "completely fails to properly establish, analyze, and consider an environmental baseline." *See Communities for a Better Environment v. City of Richmond*, 184 Cal.App.4th 70, 89 (Cal. Ct. App. 2010). "When an EIR omits relevant baseline environmental information, the agency cannot make an informed assessment of the project's impacts." *Id.*

Grp 5-3

This project fails to accurately describe the environmental baseline in several ways: (1) the "adjusted baseline" is speculative, improper, and hides from the public the true environmental impacts to the Centennial site; (2) the DEIR's use of an adjusted baseline for the Centennial Site obfuscates the actual impacts of both the cleanup and the IMM on plants and habitats at both sites; and (3) the Centennial and Brunswick aquatic and biological resources assessments and management plans do not meet CDFW, CNPS, and other protocols and standards. For example, botanical and aquatic resources surveys were conducted late in the summer, outside many plant species' blooming period, and during the dry season when not all species and wetlands would be observable. Accordingly, they cannot be relied on as evidence that all special-status plants and all wetlands on the project site have been identified.

A. The DEIR's choice of an "adjusted" baseline using only hypothetical future conditions violates CEQA.

Grp 5-4

The DEIR's use of a future "adjusted baseline," set after the cleanup has theoretically been completed, violates CEQA. In general, the baseline for evaluating the environmental impacts of a project is the existing condition of the site. Although a future baseline may be used in addition to the existing conditions when appropriate, the California Supreme Court held in *Neighbors for*

Smart Rail v Exposition Metro Line Construction Authority (2013) that a DEIR may not substitute a future baseline for an existing baseline unless there is substantial evidence that using an existing conditions baseline would be "misleading" or "uninformative" to the decision maker and the public.

Here, the reverse is true: it is the use of a solely future baseline that is "misleading" and "uninformative." Indeed, the DEIR's maps of aquatic resources and vegetation communities on the Centennial site appear to be deliberately misleading: both maps have a large blank area (characterized as 28.25 acres of the 56-acre site) described as "Area *Previously Disturbed* by DTSC clean-up project (Estimated)" *(Emphasis added)*. This description creates the false impression that these future conditions are in fact the current conditions.

This "future-only adjusted baseline" is used for five of the 13 environmental issues reviewed, including Biological Resources, without providing any substantial evidence to justify this choice. The premise of the adjusted baseline is that because the Centennial site "will" be cleaned up at some indeterminate time in the future, the environmental impacts of the mine should be measured as if the cleanup has already been completed.

As explained above, the premise underlying the "adjusted" baseline is unfounded for several reasons. First, the DTSC has not selected a specific cleanup plan, has never approved the proposed RAP, and the RAP may never be approved. Second, the DTSC MND review process is flawed and is based on a segmentation that is improper under CEQA. Third, as held in a 2021 California Court of Appeals case, applying two different types of environmental review (an MND and an EIR) to different portions of the same project violates CEQA. *Farmland Protection Alliance v. County of Yolo* (2021) 71 Cal. App 5th 300. The remedy is to start over and review all portions of the project using an EIR.

Based on this improper definition of project which excludes the Centennial cleanup, the DEIR and several of the supporting biological resources assessments and management plans flatly and repeatedly assert that the IMM will have "no impact on the wetlands" at the Centennial site, an assertion which is patently false.

B. The DEIR's Use of an Adjusted Future Conditions Baseline for the Centennial Site Obfuscates the Project's Impacts on Plants and Habitats.

Grp 5-5

Section 4.4.2 of the DEIR states that: "for the purposes of this biological resources analysis, the environmental baseline for the Centennial Industrial Site has been adjusted to be consistent with anticipated site conditions at the completion of the separate Centennial Industrial Site Clean-up Project. It is estimated that approximately half of the Centennial Industrial Site will consist of graded and revegetated areas under the post-remediation condition." (DEIR p. 4.4-2).

CEQA Guidelines make clear that "A lead agency may use projected future conditions (beyond the date of project operations) baseline as the sole baseline for analysis only if it demonstrates

with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record." (14 C.C.R. § 15125(a)(2)).

There is no substantial evidence to support the use of a future baseline this case. The cleanup has not taken place, the wetlands are presently intact, and the intermittent and ephemeral streams still exist. Moreover, as noted above, the draft Remedial Action Plan for the Centennial site has not been approved, and no specific plan has been selected.

The DEIR adjusted baseline relies on "estimates" of the aquatic resources and vegetation communities that will exist on site once the cleanup is completed, yet the parameters of the estimates are vague:

"[T]he exact acreages of each aquatic resource type cannot be precisely established for the baseline condition given that the baseline has been adjusted to account for the planned remediation efforts that will be conducted under DTSC oversight pursuant to the RAP that has been prepared and publicly reviewed for DTSC approval. Final disturbance acreages to aquatic resources as a result of remediation activities may vary from current estimates. As a result, the disturbance acreages identified herein are conservatively estimated." (DEIR 4.4-10)

This statement asserts that using the adjusted baseline makes it impossible for the DEIR to provide specific or accurate estimates of amount of each aquatic resource type that will be impacted by the project.

In other words, because the RAP has not been approved, and because no specific cleanup plan has been chosen, it is unknown what remediation "efforts" will be undertaken, or what the effects of those "efforts" will be.

This means that the baseline fails to provide any way to accurately measure the resulting environmental impacts. Accordingly, the DEIR has chosen a future baseline that is purely hypothetical.

This lack of certainty undermines the purposes of CEQA. By relying on an undefined future baseline, the DEIR fails to properly analyze the project's potential impacts to wetlands and special status plant species on the Centennial site, among other environmental impacts. Indeed, it is the proposed future baseline, and not the existing conditions, that is misleading and "uninformative" to decision makers and the public.

The future environmental baseline also violates CEQA's intent and its requirement of public disclosure. "An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the



project." (14 C.C.R. § 15121(a)). The public should be given a clear idea of the environmental impacts on the actual environmental setting, not conservative estimates that are subject to change because the DEIR failed at the outset to accurately describe the environmental setting.

This uncertainty is in stark contrast to DEIR Appendix F-1, "Aquatic Resources Delineation of Waters of the United States and State of California" for the Centennial Site, which clearly delineates 4.37 acres of mapped wetlands and .6 acres of streams, including intermittent and ephemeral streams, on the Centennial site. (pp. 5-1 to 5-4)

See also DEIR Appendix F-5, "Centennial Aquatic Resources Management Plan" ("ARMP"). As noted above in Section III, the plan notes that 4.54 acres of wetlands and streams "inside the area of disturbance for the IMM Project" will be impacted, but that the "impacts and associated mitigation" for these aquatic resources "will be incorporated into the DTSC voluntary cleanup project and is [sic] outside the scope of the IMM." Appendix F-5 p. 5-1.

The ARMP goes on to state that "After the environmental cleanup work at the Centennial ... Site is complete, ... engineered fill [will be trucked from the Brunswick ... Site to the Centennial Site." There would be a total surface area disturbance of approximately 44 acres, "including the previously disturbed area from the DTSC cleanup project..." The portion of the disturbance assigned by the DEIR to the IMM Project "would disturb approximately 0.033 acres to mapped streams."

The DEIR thus proposes mitigation only for this 33/100 of an acre (~1472 sq feet, about the size of a small house) of mapped streams, and no mitigation whatsoever for the 4.54 of wetlands and streams mapped in the Aquatic Resources Delineation.

The use of a future "adjusted baseline" together with the "piecemeal" project description obscures the actual impacts to wetlands and other biological resources on the Centennial Site. It also prevents any meaningful evaluation of those environmental impacts or appropriate mitigations for those impacts. These are all serious violations of CEQA that undermine and obstruct its purposes.

C. The Botanical and Wetland Surveys and Management Plans Do Not Meet CEQA Standards

1. Botanical and Wetland Surveys Were Not Seasonally Appropriate to Identify Plants and Wetlands on the Project Site.

Grp 5-6

Reconnaissance surveys for this project were done in December 2018, and protocol-level surveys were conducted in July and August 2019. The wetland surveys were done in December, July, 2019, and August 27, 2020. The late-summer surveys fall outside of the blooming periods for many of the special-status plants that have potential to occur on the project site, and at a time that many wetland features would not be evident. Because the surveys were deficient,

they may have failed to confirm special-status plants and wetland features that are in fact present on site. Any analysis, conclusions, or mitigation measures for impacts to special-status plants and to wetlands are inaccurate and not based on substantial evidence.

An independent peer review by Madrone Ecological Consulting found many deficiencies in the biological aquatic resources assessments and management plans.

These include failure to conduct appropriately timed surveys for special status plants at both the Centennial and Brunswick sites. The Madrone Peer Review noted that surveys were only conducted in July and Aug 2019. Botanical surveys were conducted for the Centennial Industrial Site on July 1, 10 and 14, 2019, and for the Brunswick Area, on July 1, 14, and August 16, 2019.

California Department of Fish and Wildlife (CDFW) "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" require that botanical field surveys be conducted in a manner that maximizes the likelihood of locating special status plants and sensitive natural communities that may be present. Surveys must be conducted at the times of year when plants will be both "evident" and "identifiable," usually during flowering season.

The Protocols also provide that:

*Surveys are to be spaced throughout the growing season to accurately determine what plants exist in the project area, which usually involves multiple visits to the project area in early, middle and late season.

*When special status plants are known to occur in the types of habitat present in a project area, reference sites are to be observed to determine if the special status plants are identifiable at the times of year the surveys take place.

*Additional botanical field surveys may be necessary [if], for example, ... surveys were not conducted at the appropriate time of year; were not conducted during a sufficient number of years to detect plants that are not evident and identifiable every year [e.g., fritillaries]; or if fire history or other conditions have changed since the last botanical survey was conducted.

*Because adverse conditions from yearly weather patterns may prevent botanical field surveyors from finding or accurately identifying some special status plats in a given year, all adverse conditions should be discussed in the survey report.

The Madrone Peer Review concluded that the field surveys for several potential special-status species were not conducted in accordance with the CDFW Special-Status Plant Survey Protocols in several respects:

A. "Surveys were not conducted during the identifiable season of all target species. Outside of the "identifiable season" plant species may no longer be visible ... may be less

evident (easily overlooked), and are often not possible to identify to a level necessary to determine rarity."

The only surveys were done in July and August 2019, which is later than the blooming season of several flowers. Citing data from the California Consortium of Herbaria, the Madrone review noted that Stebbins' morning glory, Butte County fritillary, and Cedar Crest popcornflower have never been documented as blooming as late as July or August, and thus they would not have been both evident and identifiable at the time the surveys were conducted. [*"Stebbins' morning glory is almost always documented in May or early June, Butte County fritillary is almost always documented in March or April, and Cedar Crest popcorn flower has only been collected in April or May." Madrone Report p. 4.*]

The Madrone Review also identified Red Hills soaproot, finger rush, and dubious pea as plants typically identifiable earlier than July.

The Review concluded that "Surveys were not conducted during the identifiable season of all target species" and recommended that "full, protocol-level surveys for [six] plant species be conducted." It appears that no such additional surveys were conducted.

B. The Madrone Review also noted that "The CDFW survey protocol requires site visits for special-status plants with potential to occur on a project site ... [yet] Reference visits were conducted for only one of the target plant species. ... Without reference site visits, it is hard to know if the target plants were identifiable when the surveys were conducted." It appears that no additional reference site visits were conducted.

C. Citing CDFW Protocol requirements that surveys and plant lists be comprehensive, the Madrone Review identified a number of plant species that had been omitted from the pant list. In addition, the Review observed that no species from the genera Sidalcea and Fritillaria. The Review expressed concern regarding these omissions, because species of these two genera (Sidalcea and Fritillaria) appear on the list of special-status plants with potential to occur within the Study Area. The Review expressed concerns that the Biological Resources Reports failed to identify and document these genera, and recommend that an additional special-status plant survey be conducted during the blooming period for the special status species in these genera." Madrone Review p. 5. It appears that no additional special-status plant surveys for these species were conducted.

Grp 5-7

D. The Madrone Review noted that CDFW Protocols require that special-status plant surveys include a discussion of sensitive natural communities, and that the biological assessments did not include any discussion of sensitive natural communities. Madrone

recommended that sensitive natural communities be discussed." It appears that no discussion of sensitive natural communities was added to the biological resources assessments.

In addition to these observations of the Madrone review, a wildfire in August, 2021, burned substantial portions of the Centennial Site; this fire triggered the "changed conditions" provisions of the CDFW. Some of the special status plants present or potentially present on the Centennial site are fire adapted. Such adaptations include seeds that germinate after fire, or basal resprouting of burned plants. Biological surveys were required after the fire to locate new post-fire seedlings.

See *Effects of a firebreak on plants and wildlife at Pine Hill, a biodiversity hotspot*, J.M. Klip, M.R. Caldwell, D.R. Ayres, and V. Meyer California Fish and Wildlife, Fire Special Issue, pp. 58-81 (2020) (Pine Hill Flannelbush seeds are cued to germinate by fire's heat; over 1,100 Pine Hill Flannelbush seedlings were found within 13 months of 1983 experimental fire, with no additional seedlings sighted until 2020 when several piles of vegetation were burned a year earlier in 2019.)

Grp 5-8

See also Effects of Fire on the *Demography of Three Rare Chaparral Plants (Calystegia stebbinsii* [and two others]), Conference paper at Symposium of the Botanical Society of America (2009)(D.R. Ayres) (in plot that had no Calystegia stebbinsii [Stebbins' morning glory] before fire, C. stebbinsii germinated profusely the first spring after the fire, and began blooming heavily three years after fire).

Accordingly, a new survey is necessary to determine the effects of the fire on the existing Pine Hill Flannelbush and on seedbanks that may contain dormant C. stebbinsii seeds at the Centennial site. An additional survey needs to be done for post-fire seedlings of the protected rare C. stebbinsii. In addition, the Management Plan for the Pine Hill Flannelbush requires updating to determine which if any of the Pine Hill Flannelbush were killed or damaged by the fire; whether any resprouted, and whether there are new seedlings that need to be protected and incorporated into the management plan.

The DEIR does not indicate that any post-fire surveys have been done; early spring of 2022 would be the best time to initiate such surveys.

2. Mitigation Measures Improperly Defer Plant Surveys

Deferring surveys is improper under CEQA for numerous reasons. Deferring environmental assessment to a future date is contrary to the "policy of CEQA which requires environmental review at the earliest feasible stage in the planning process." *Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 307 (Cal. Ct. App. 1988). "Environmental problems should be considered at a point in the planning process 'where genuine flexibility remains.' . . . A study conducted after approval of a project will inevitably have a diminished

Grp 5-9

influence on decision making. Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA." *Id.* (internal quotations and citations omitted).

CEQA also gives the public the right to review projects before they are approved and provide public comment. The public is entitled to be informed of the results of plant surveys and how the project will impact plants and vegetation present on the project site. Delaying surveys until some vague, undefined time in the future after the project has been approved is contrary to these principles. Finally, delaying surveys until immediately prior to construction can make avoidance of special-status plants impracticable. If species are discovered during the survey that were not accounted for in the project design, last minute changes to project design are often prohibitively expensive, or impossible altogether.

The DEIR should not rely on preconstruction surveys to make up for the late-season or botanical surveys conducted in 2019 or for the lack of post-fire surveys in 2022.

Conclusion

Grp 5-10

For the reasons described above, we respectfully request that the DEIR be redone, and that it include a review of the entire IMM project and cleanup, so that a full and accurate assessment of the true environmental impacts of this project can be completed and re-issued for public review.

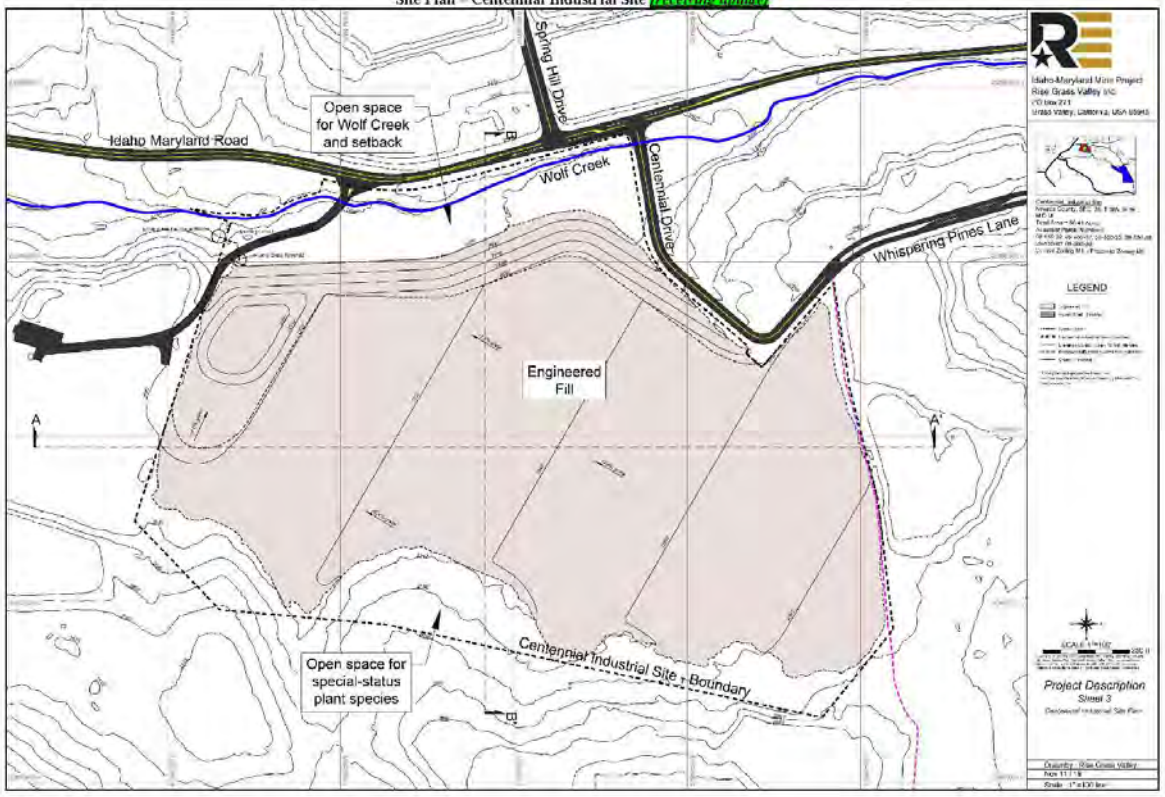
Sincerely,

Isabella Langone
Conservation Program Manager
California Native Plant Society
ilangone@cnps.org

Jeanne Wilson
Co-Chair, Conservation Advocacy
Redbud Chapter, CNPS
jxwmotes@icloud.com

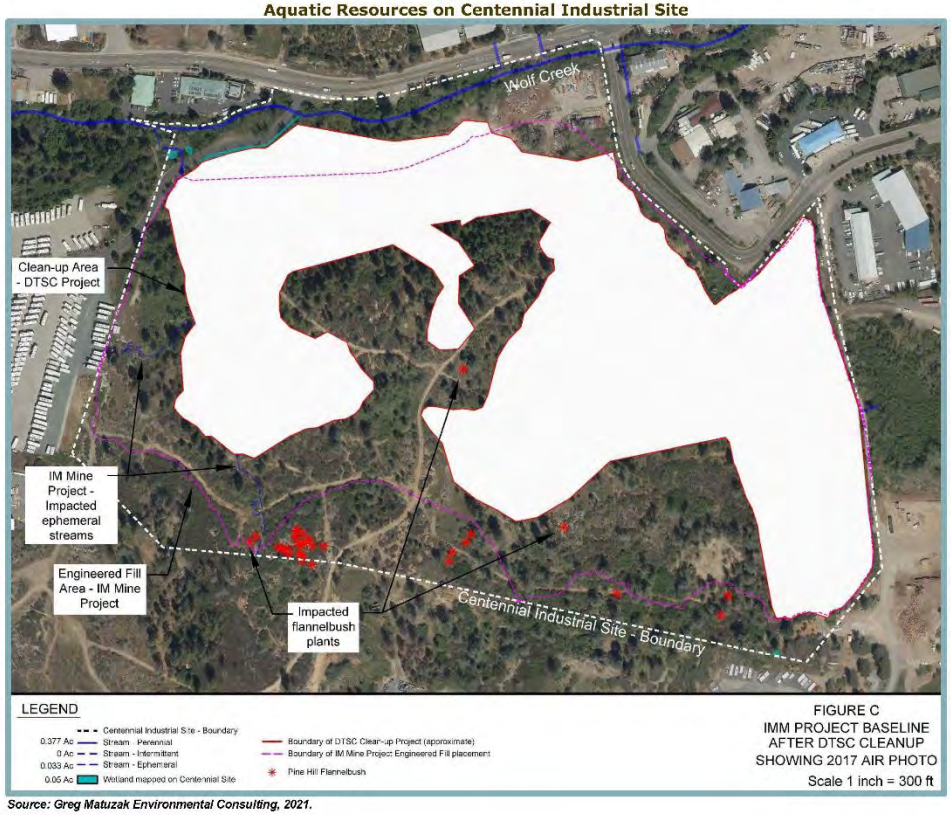
Attachment A

Figure 7
Site Plan – Centennial Industrial Site *(receiving update)*



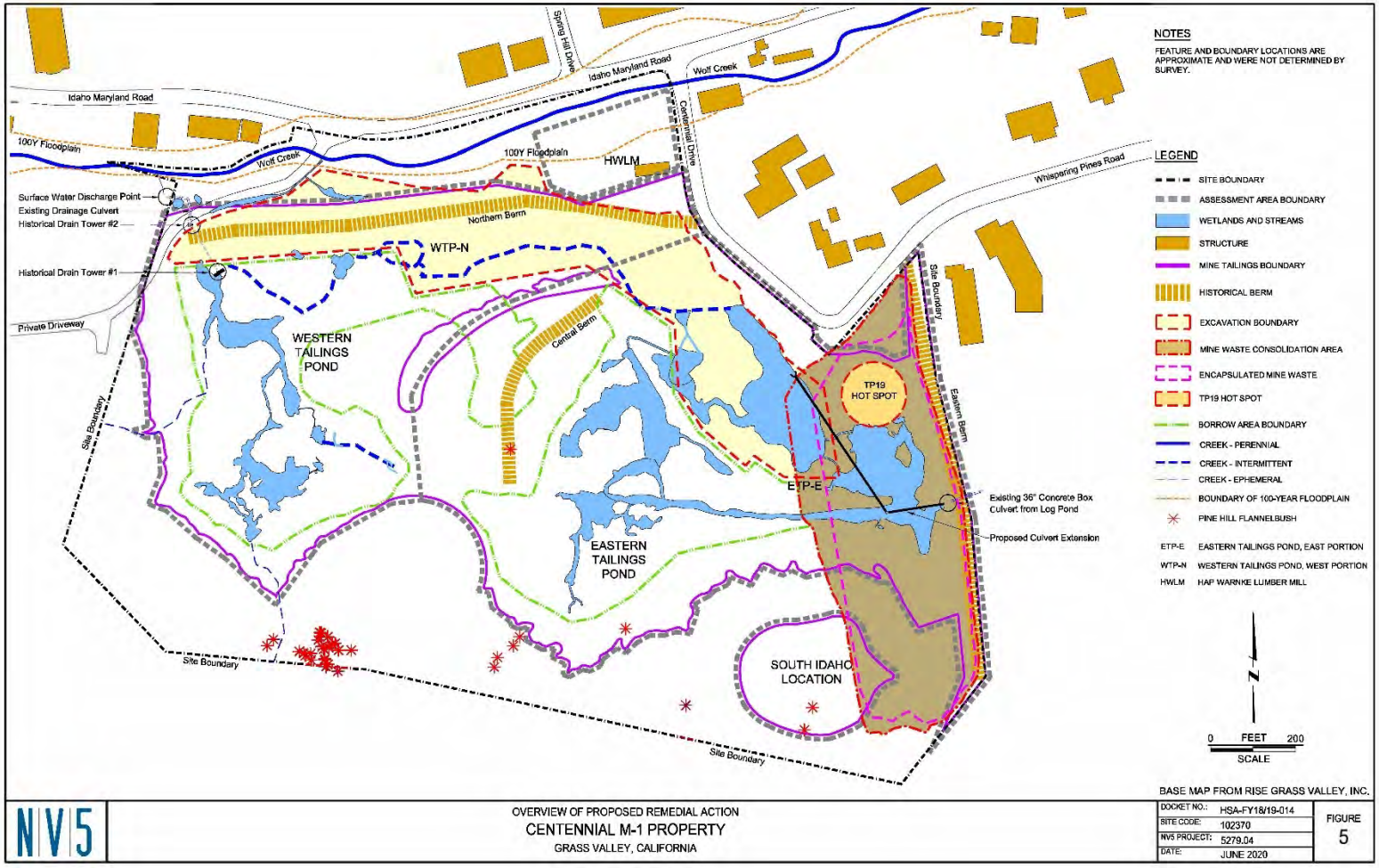
Attachment A

Figure 4.4-3
Aquatic Resources on Centennial Industrial Site



Source: Greg Matuzak Environmental Consulting, 2021.

Attachment C



GROUP LETTER 5: JEANNE WILSON, CALIFORNIA NATIVE PLANT SOCIETY – REDBUD CHAPTER

Response to Comment Grp 5-1
Please see DEIR section 1.3 and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. Please also see Response to Comment Grp 20-8.

Response to Comment Grp 5-2
Please see DEIR section 1.3 and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. Please also see Response to Comment Grp 20-8.

Response to Comment Grp 5-3
Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA, and DEIR Section 1.3 regarding use of an adjusted environmental baseline at the Centennial property given the separate Centennial M-1 Clean-Up project under review by DTSC.

Regarding the commenter's position the technical studies are inadequate because of the timing of biological surveys, please see Master Response 30 - Technical Study Adequacy, Master Response 31 - Rare Plants, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 5-4
Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA, and DEIR Section 1.3 regarding use of an adjusted environmental baseline at the Centennial property given the separate Centennial M-1 Clean-Up project under review by DTSC. The Centennial Site cannot be used as part of the project unless and until the DTSC cleanup project has already been completed. Thus, the baseline used in the DEIR is appropriate for the Centennial Site and related impacts. Please also see Response to Comment Grp 20-8.

Response to Comment Grp 5-5
Please see DEIR Section 1.3 and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. Please also see Response to Comment Grp 20-8. As noted in D EIR Section 4.4.2, the estimates included in the DEIR are conservative and overinclusive of potential impacts areas in the event minor changes to the separate DTSC clean-up project occur.

Response to Comment Grp 5-6
The commenter asserts that botanical and wetland surveys were not adequate due to timing issues. Please see Master Response 30 - Technical Study Adequacy, Master Response 31 - Rare Plants, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. As noted by the commenter, extensive peer review of the technical studies were conducted by the County's independent consultant. Following review and comment, technical studies were revised and resubmitted to the County in consideration of the County consultant's comments. The County accepted the revised technical studies and used the information to perform their biological impact analysis.

Response to Comment Grp 5-7
Please see Response to Comment Grp 5-6 above.

Response to Comment Grp 5-8
Please see Master Response 31 - Rare Plants, and Appendix G to this Final EIR, which includes the results of a rare plant survey conducted after the wildfire cited by the commenter. Mitigation

Measures 4.4-1(a) and 4.4.1 (b) require the applicant to implement the Centennial Pine Hill Flannelbush Habitat Management Plan, obtain an ITP from CDFW for impacts to Pine Hill flannelbush, complete another set of protocol-level special status plant surveys, and consult with Nevada County Planning Department, as well as CDFW and/or USFWS if the plant is state- or federally-listed. Therefore, no additional mitigation is required to reduce potential impacts to special status plants to a less than significant level.

Response to Comment Grp 5-9

This comment is conclusory in nature, stating that the DEIR defers mitigation and does not sufficiently identify performance standards. The comment does not identify any specific mitigation measures that are deficient. In the case *Center for Biological Diversity v. California Department of Conservation, etc*. (2019), the court explains that "[g]enerally, it is improper to defer the formulation of mitigation measures…However, an exception to this general rule applies when the agency has committed itself to specific performance criteria for evaluating the efficacy of the measures to be implemented in the future, and the future mitigation measures are formulated and operational before the project activity that they regulate begins." (36 Cal.App.5th 210, 239.) The court determined both conditions were met and upheld the deferred mitigation measures. Similarly, the mitigation measures presented in the DEIR require compliance with specific performance standards and regulatory requirements, and also require implementation prior to project activities begin.

The DEIR included rare plant surveys, conducted by experts in the field and with knowledge of the region, as Appendices F.6 and F.11. These technical studies were peer reviewed by the County's independent consultant and, once those comments were addressed, the County utilized this information to prepare their impact analysis. As concluded in the DEIR, impacts to special status plants are potentially significant and mitigation measures were provided. The mitigation measures require conducting preconstruction surveys prior to onsite surface disturbance to ensure no new special status plant species would be impacted by project construction. The DEIR clearly identifies potential special status plant species that may be impacted by the project. The mitigation measure clearly establishes performance standards and timing for when preconstruction surveys shall be conducted and what should occur based on the results of those surveys. As a result, the DEIR clearly identifies the potential impacts to special status plants and provides enforceable mitigation measures. In addition, please see Master Response 31 - Rare Plants and Appendix G to this Final EIR, which includes the results of a rare plant survey conducted after the wildfire and release of the DEIR. Mitigation Measures 4.4-1(a) and 4.4.1 (b) require the applicant to implement the Centennial Pine Hill Flannelbush Habitat Management Plan and complete focused special status plant surveys. Therefore, no additional mitigation is required to reduce potential impacts to special status plants to a less than significant level.

Response to Comment Grp 5-10

The commenter requests that the DEIR be revised and recirculated with the DTSC cleanup project included in the Project Description. The commenter's specific comments are addressed in Responses to Comments Grp 5-1 to Grp 5-9. The County has concluded that the DEIR is adequate, and recirculation is not required.

Group Letter 6

Community Environmental Advocates FOUNDATION

PO Box 972, Cedar Ridge, CA 95924-0972
www.cea-nc.org / email: info@cea-nc.org

February 22, 2022

Nevada County Board of Supervisors
950 Maidu Avenue.Ste. 200
Nevada City, CA 95959
bdofsupervisors@co.nevada.ca.us

RE: The County has NOT made a determination on the Idaho-Maryland Mine

Dear Supervisors:

Grp 6-1 As you may be aware, Idaho-Maryland Mine owner Rise Gold Corp has sent out yet another mailer to Nevada County residents, this time claiming that "Nevada County **has just completed** the most thorough environmental study in its history," along with numerous unresolved claims about the project. The mailer includes a form for supporters to mail in to Rise Gold.

We want to bring your attention to another letter that was sent to well owners in the mine area. (Copy included)

Grp 6-2 The letter states: "**The County has determined** that no domestic water wells will be drained by mine dewatering," that "**The County has determined**, using a safety factor of 100%, that several wells...could be impacted...to a maximum of 10 feet," and "**The County has determined** that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project."

Grp 6-3 We feel that it would serve the public interest for the County to issue a clarifying statement regarding the status of the Draft EIR and the status of determinations by the County.

Thank you.
Sincerely,
Ralph

Ralph Silberstein, President
CEA Foundation
ralph@cea-nc.org
ralphasil@gmail.com
530 277 2039 (c)

Rise Grass Valley Inc.
333 Crown Pt Circle, Ste 215
Grass Valley, CA 95945 USA

February 11th, 2022

[redacted]
Grass Valley, CA 95945

Mr. [redacted],

The Idaho-Maryland Mine Project proposes reopening the Idaho-Maryland underground mine with facilities constructed on the Brunswick Industrial site located south-west of the Brunswick Road and E. Bennett Road intersection. Nevada County has recently issued (January 4th, 2022) a Draft Environmental Impact Report (the "DEIR") for the Idaho-Maryland Mine Project. Rise has reviewed this document in detail over the last month and we are reaching out to you to provide further information on our project.

Rise Grass Valley Inc. (Rise) is the owner of the mineral rights, starting 200 feet and deeper beneath your surface property including all necessary and convenient rights to extract them, excepting the right of entry to the surface land. To access its mineral estate, Rise must first dewater the underground mine, and because your property is on a well, extensive research and modeling by certified, licensed hydrogeologists took place to assure us, the County and you how your well might be affected. While Rise does own the mineral rights deeper than 200 feet below the surface, Rise respects your surface property rights and is committed to being a good neighbor and community member. Out of an abundance of caution, Rise plans to provide you the option to connect to NID water at Rise's expense.

The hydrogeologic analysis was peer-reviewed by an independent California-licensed hydrogeologist. The County has determined that no domestic water wells will be drained by mine dewatering. The County has determined, using a safety factor of 100%, that several wells in the East Bennet Road area could be impacted by a reduction in the water column of wells ranging to a maximum of 10 feet. It should be noted that the water level in the existing mine workings is already approximately 100 feet below the depth of groundwater in your area, which illustrates that the mine is not hydrologically connected by significant fractures to the shallower groundwater well due to the impervious nature of the surrounding rock. Nevertheless, to ensure that you have 100% confidence in an uninterrupted access to water, Rise has committed to construct, at its own cost, an extension of the Nevada Irrigation District (NID) potable water system along E. Bennett Road which could service your property if you choose. This construction and connection would take place before any mine dewatering commences. Thus, you will have the option of either connecting to NID water, at Rise's cost, and/or continuing to use your domestic well. The County has determined that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project. Water does not flow upward from the mine

workings to feed your well, and as the water in the mine workings is removed, that would continue to be the case.

If you decide to utilize NID potable water, Rise will fund the connection to your property. The value per property owner, including capacity charges, is estimated at approximately $85,000. Rise would also pay for your ongoing water charges as long as you own your property. A high-quality water supply from NID would alleviate your ongoing treatment and monitoring of your current well. In addition, this water supply is reliable and not interrupted during our area's increasingly frequent power outages.

If requested by the landowner at the time of NID connection and service to their properties, Rise will pay to close property owners' wells using certified well drillers and under Nevada County regulations.

If the Nevada Board of Supervisors approves the project, we will proceed with the detailed design of the potable water line. We will consult with you about your preference in meter location and desire to connect to the NID potable water system.

The Idaho-Maryland Mine Project also has direct benefits to fire protection for your property. The extension of the water pipeline along E. Bennett Road will allow for installing of fire hydrants and allow firefighters to respond to fires in your area much more efficiently. Rise has also agreed to provide Ophir Hill Fire Protection District with a new fire engine and additional firefighters which will significantly enhance their ability to provide excellent service in your area.

Your property is over 1/2 of a mile away from the Brunswick site, and it would not be impacted by noise during operations. Rise will not route truck traffic along E. Bennett Road adjacent to your property. Technical analysis, performed by an expert PhD, shows that the anticipated vibrations from drilling and blasting underground are negligible, and in almost all situations, drilling and blasting will be unnoticeable and undetectable.

Rise recently engaged RCLCO Real Estate Consulting, a highly respected firm, on the potential effect of the Idaho-Maryland Mine Project on local real estate values in the local area. RCLCO found no negative impact on home prices based upon case studies or recently opened mines. However, due to demand created by employment, homes sold closer to a mine actually achieve higher pricing than those sold farther away. We believe the extension of NID water service will increase the value of your property, as will the economic impact of the 300+ high-paying jobs and approximately 300 indirect jobs that the project will create.

You can learn more about the Idaho-Maryland Mine Project at www.risegrassvalley.com and our company at www.risegoldcorp.com. If you are interested in more information, have any concerns, or wish to support our project please contact me and I would be pleased to arrange a

meeting in our Grass Valley office or at the Brunswick site. If you would like to meet in person or speak further about our project and the proposed NID water service, please contact me by phone or email as below.

Sincerely,

Ben Mossman
President, Rise Grass Valley, Inc.
CEO, Rise Gold Corp.
(530) 433-0188
info@risegoldcorp.com

GROUP LETTER 6: RALPH SILBERSTEIN, COMMUNITY ENVIRONMENTAL ADVOCATES FOUNDATION

Response to Comment Grp 6-1

The comment is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 6-2

The commenter summarizes the contents of a mailer provided by the applicant, which is provided as an attachment for the County to review. The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 6-3

The comment is noted but does not address the adequacy of the DEIR. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Group Letter 7

Community Environmental Advocates FOUNDATION
PO Box 972, Cedar Ridge, CA 95924-0972
www.cea-nc.org / email: info@cea-nc.org

March 30, 2022

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
Email: matt.kelley@co.nevada.ca.us
DEIR Comment Email: idaho.mmeir@co.nevada.ca.us

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

To All Concerned:

Grp 7-1

This letter is written on behalf of Community Environmental Advocates Foundation, The Sierra Fund, South Yuba River Citizens League, Wolf Creek Community Alliance, the state office and the Redbud Chapter of the California Native Plant Society, Sierra Foothills Audubon Society, Sierra Nevada Group Sierra Club, Friends of Bear River, Nevada County Climate Action Now, Brunswick Manor HOA, San Juan Ridge Taxpayers Association, Earth Justice Ministries, Elders Action Network, Patagonia, Friends of Banner Mountain, the Wells Coalition, Sierra Streams Institute, Brunswick Pines Road Association, Wawona Madrono Homeowners Association, and members of the Nevada County community at large who have identified many issues of concern regarding the potential reopening of the Idaho-Maryland Mine (Mine, Mine Project, or Project) Grass Valley.

As a coalition of community and environmental organizations in Nevada County, we appreciate the opportunity to provide public comment on the Draft Environmental Impact Report (DEIR) released by Nevada County for public review on January 4, 2022, addressing the environmental impacts of re-opening and operating the Mine for the next 80 years.

We are concerned about the long-lasting environmental impacts that the Mine Project would cause and the inadequacy of the environmental analysis of the DEIR. A number of key points are provided here. More detailed and complete comments from individuals and organizations are being submitted separately.

Note documents cited and submitted under separate cover:

- Baseline Environmental Consultant Report, Feb 15, 2022 (Baseline).
- Salter Report, March 9, 2022 (Salter).
- Comments on the Idaho-Maryland Draft EIR - 16Mar22, Center for Science in Public Participation (CSP2).

PROJECT DESCRIPTION

1 The DEIR does not adequately define the Mine Project to include the Centennial site and accordingly, fails to identify all potential impacts.

Grp 7-2

The DEIR fails to adequately address impacts associated with the Centennial Industrial Site (Centennial). This site is the location of hazardous waste left over from past Idaho Maryland Mine operations. The DEIR assumes that the Centennial site will be cleaned up before the use of the site for deposition of new mine waste. Yet the significant work which is needed to accomplish this clean-up is not disclosed nor evaluated in the DEIR. Rather, the DEIR assumes that the clean-up has already been accomplished, and uses the post clean-up conditions as the baseline for some of its environmental impact assessments.

The DEIR does not describe the current physical conditions of the Centennial site or include the necessary clean up of the existing contamination at that site as part of the Project because it assumes that Centennial will be cleaned up prior to the start of construction. As discussed above, the clean up for Centennial has not been approved by Department of Toxic Substances Control (DTSC) and it is unclear when DTSC might approve the clean up. Consequently, it cannot be excluded from this DEIR. As a result, any assumptions about baseline conditions for purposes of assessing impacts to the Mine Project are speculative at best, and at worst, significantly underestimate the actual impacts of the Project.

The current conditions of the Centennial site must be used as the DEIR baseline in order to meet the CEQA requirements for a full analysis of the impacts of the Mine Project. Moreover, the Centennial clean up should be included as part of the Project to address the whole of the action under CEQA. In order to accurately assess impacts, the existing conditions, or baseline, of the Project must be the current state of the Centennial site, not a speculative future condition.

2 Construction time estimates are inadequate and affect noise, traffic, air, and other impact areas.

Grp 7-3

Construction time estimates in the DEIR are contradictory and inadequate. For example, the DEIR states in several instances that the Project is estimated to have a twelve month construction phase, but also states that the construction of the water treatment facility alone would take eighteen months.

Furthermore, neither of these estimates - twelve or eighteen months - is sufficient to capture all phases of construction. As just one example, the applicant would have to complete significant grading and underground development before initiating the eighteen month construction of the water treatment facility. Similarly, the water treatment facility would have to be completed before dewatering of the mine could begin. Dewatering is a six month process. After dewatering has been completed, the new shaft for ventilation and emergency access would have to be constructed to the 1000' depth by working upwards from below. Then, before beginning any actual new mining, the tunnels would need to be restored sufficiently to allow for construction of the underground rock crushing facility. All of these activities must happen sequentially, not in parallel. Therefore, a more reasonable estimate of construction length for the Project would be four to six years, clearly resulting in significantly different annual and cumulative impacts than the ones identified in the DEIR.

Grp 7-4

The DEIR should be revised to provide an accurate description of each construction project, including its intended duration. This revised description must also include the sequencing of construction projects. Until this information is provided, the DEIR preparers will be unable to properly assess the annual and cumulative impacts on air, noise, traffic, aesthetics, and other resource areas.

3 The DEIR has not demonstrated that mine waste disposal by off site sales would be viable.

The DEIR indicates that the applicant (Rise) plans to sell waste rock on the open market if it is still being produced after the two proposed waste rock piles reach capacity (DEIR Project Description). The Regional Water Board has jurisdiction over the disposal location requirements for mine waste rock. Although the DEIR does not disclose this, the concept of selling waste rock is an unrealistic and infeasible proposal unless the Water Board has determined that such discharges would not pose a threat to water quality. Accordingly, the Project should not rely on this concept and the DEIR should identify all impacts associated with alternative disposal methods.

Grp 7-5

Even if the mine waste can be sold, the market for aggregates varies significantly by season. During rainy seasons, it may be necessary to stockpile the aggregate onsite, but there are no provisions for onsite storage in the DEIR or an assessment of impacts related to such storage. As reported by the Center for Science in Public Participation (CSP2), dispersing waste rock and other mine waste over large areas without containment often results in contamination (e.g., Calcine mercury mine tailings used for road construction in San Luis Obispo County). (CSP2)

The absence of provisions for temporary waste rock storage (and the associated analysis of its impact) creates strict operational constraints and potential impacts on all phases of processing have not been addressed in the DEIR. The DEIR should be revised to include an analysis of these impacts.

4 Mine waste and ore processing stockpiling: proposed processes may not be viable due to the necessary safeguard controls for asbestos.

Grp 7-6

(See "ASUR Plan Analysis.pdf", attached as a reference to this letter. Portions of that document are summarized here.)

The plan described in the DEIR for managing asbestos-laden mined materials is inadequate. Asbestos is likely to be released during underground blasting, crushing, and ore processing. It also is released during material handling, on-road transport, placement grading and compaction. The DEIR states that the Asbestos Management Plan would ensure that average mined material and engineered fill contains less than 0.01% asbestos. (DEIR 3-20) Testing the asbestos content, however, does not control the amount of asbestos in the actual material mined. To control the average amount of asbestos in output materials (and to avoid significant impacts related to asbestos exposure), the DEIR must ensure that asbestos levels do not exceed this threshold. Currently, the DEIR does not include any evidence that asbestos levels will not exceed this threshold.

The testing process may require up to two weeks before the results are known, yet the Project calls for daily mining activity to continue during this time. This daily mined material would have to be stockpiled while awaiting the test results, which could expose workers to dangerous levels of asbestos. The DEIR does not disclose this fact nor does it analyze the associated impacts.

In addition, if the running average of asbestos in the daily mined material exceeds the required threshold, batches containing higher asbestos levels would have to be stockpiled in order to be later mixed with batches having lower asbestos levels. The DEIR does not disclose this fact nor does it analyze the associated impacts.

Grp 7-7

The mineral processing described in the DEIR does not address the need for stockpiling materials or address the likely impacts of such efforts. The Asbestos Management Plan provided in the revised DEIR must detail all of the steps necessary to carry out the correct management of this hazardous waste, including the location and organization of stockpiled materials, and adequate safeguards to avoid fugitive dust emissions and potentially hazardous conditions.

HAZARDS AND HAZARDOUS MATERIALS

5 The DEIR inadequately describes potentially hazardous waste rock and mine tailings management.

As pointed out by Baseline Engineering Consultants (Baseline), the legacy contamination from prior mining indicates that the types of rock historically mined at the site contain heavy metals and, when excavated, these waste rock and mine tailings have been found to contain contaminants that pose a potential risk to people and the environment.

Grp 7-8

"Neither the DEIR Project Description nor the Hazards and Hazardous Materials section adequately describes how future waste rock and mine tailings generated by the proposed project would be managed to ensure that they do not pose a health hazard to people or the environment (as the placement of similar waste materials from the same mine did in the past)" (Baseline).
The revised DEIR must provide adequate information about the potential risks of the waste rock tailings and all potential impacts.

WATER QUALITY

6 Drill core testing for water quality impacts is inadequate.

Given the size and scope of the proposed Project, there was an insufficient quantity of drill core rock analyzed to determine the mine's true impact on water quality.

By way of illustration, between 2017 and 2019, the applicant drilled for, and extracted, a total of 67,500 feet of rock core. But of these 67,500 feet of drill core, only 0.68% were submitted for analysis. And of the few samples that were submitted for analyses, a dearth of information is provided regarding the sample materials' true weight, volume, particle size, and sampling technique. Nor are the drill logs for these core samples available for review, so the actual dates, precise locations, drift angles, widths, final depths, etc. are unknown. Several times the DEIR refers the reader to a "separate report" which will explain some of these omissions, but no such report is found in the document or its appendices.

Grp 7-9

In addition to the limited sample size and the inadequate sampling details, four different labs were employed to carry out the analyses of the submitted samples, but the samples did not have a proper chain of custodies (COC) processes. The COC is a process that tracks the movement of samples through their collection, safeguarding, and analysis lifecycle between the mine applicant and the labs, but the COCs do not reflect the written account found in the DEIR.

The revised DEIR must provide an explanation for the discrepancies in the chains of custodies for the samples submitted to labs and provide evidence that the samples are scientifically reliable.

This insufficient and unreliable data affects the accuracy of any analysis based on this data, such as an analysis of the metal leachate content of rock. Since metal leachate from mine rock affects water quality, analyzing metal leachate is one of the key concerns regarding the rock tailings produced by the Project. The limited amount of core material sampled and the imprecise manner in which the details of the core samples are reported makes the metal leachate analysis unreliable and leads the DEIR to underestimate potential impacts.

Grp 7-10

The revised DEIR should include a full set of data and drill logs that can be reliably analyzed by the public.

Grp 7-11

7 Assessments of the current mine water chemistry are inadequate.

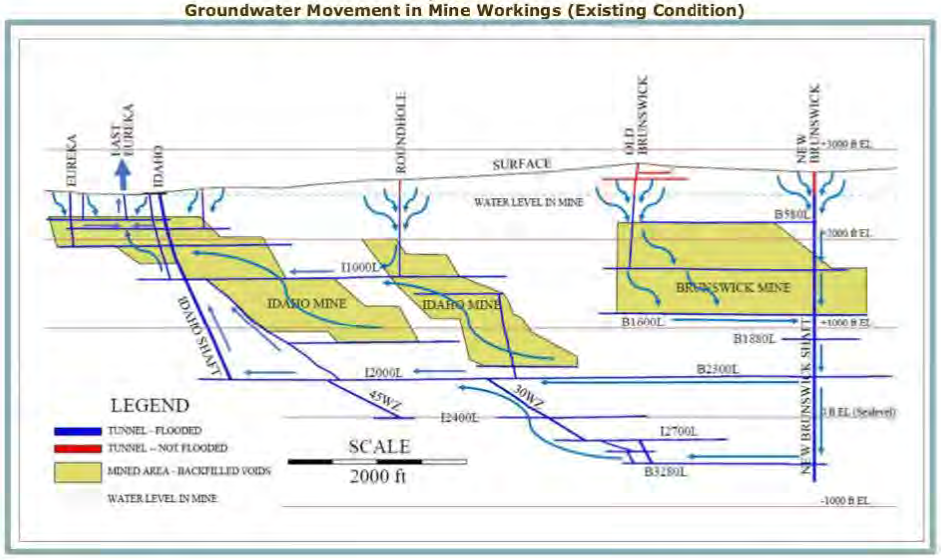
The Hydrology Report (DEIR Appendix K.2, Table 4-10, p120) uses discharge screening limits and data from the New Brunswick shaft to define water treatment criteria. However, a more accurate sampling of mine water would be from the drains located along Wolf Creek rather than from the New Brunswick shaft, as described in the analysis of mine water flow (see DEIR Figure 4.8-7), which shows water entering the New Brunswick shaft then flowing downward through the

Grp 7-12

extant mineworks to exit the drains at Wolf Creek (Eureka drain, East Eureka drain, etc). Only a few samples taken from the drains were reported, but these samples are much more representative of the mine water chemistry and indicate higher levels of Iron, Manganese, Arsenic, Aluminum, and Zinc than the New Brunswick shaft samples (DEIR K.2 Tables 3-6).

In order to get an accurate assessment of the contaminants flowing out of the mine under varying conditions, regular testing must be conducted over time at the Mine drains. The testing must also be conducted seasonally during differing rates of outflow. Moreover, in order to provide the public with a conservative estimate of potential impacts, the DEIR should use the results from the drain samples rather than the New Brunswick shaft, which would show potential water quality impacts from higher level of metals, arsenic and zinc.

Figure 4.8-7
Groundwater Movement in Mine Workings (Existing Condition)



8 The hydrology study incorrectly assesses the potential for long term acid mine type drainage.

Grp 7-13

The Empire Mine, adjacent to the Idaho-Maryland Mine, provides clear evidence of the potential for contaminants that could be discharged from the Mine and from tailings and mine waste intended to be deposited on the surface or back within the Mine as backfill. Mine water discharged from the Empire Mine has excessive levels of arsenic, iron, and manganese.

The EMKO hydrology study used in the DEIR dismisses the potential for acid drainage which could affect water quality in Wolf Creek. Instead, the DEIR claims "Any acid generated during the oxidation would be quickly neutralized by the carbonate minerals in the host rock" and cites neutral or high (non acid) pH values. (DEIR 4.8-49, 50) However, the short term method used by EMKO is not a reliable method for predicting the long term potential for contaminants to be discharged from mine waste. Results would be more reliable using long term tests, on the order of months rather than hours or days.

The waste rock's potential to produce poor quality effluent should be thoroughly characterized using appropriate tests to the satisfaction of the Water Board (e.g., ASTM D 5744) over a sufficient period, also to the satisfaction of the Water Board (e.g., 40 weeks).

Accordingly, more extensive testing of mine waste rock and tailings must be conducted to assess the potential for contaminant leaching from mine waste. Long term dynamic testing must be conducted to accurately identify potential impacts to water quality. Due to variations in geology as mining progresses, repeated testing of the mine waste must be done.

Grp 7-14

The revised DEIR must specify how long-term monitoring of acid mine type drainage would be accomplished and identify mitigation measures capable of ensuring that any unanticipated contaminants do not adversely affect water quality. Without providing such testing and identifying feasible and effective mitigation measures, the impact must be identified as significant and unavoidable.

9 It is not adequate to defer analysis of mine waste, a potential hazard, to some future date without providing substantial evidence that the proposed actions will not result in environmental impacts.

Grp 7-15

The mine waste has not been adequately tested and one must conservatively conclude that it has a high potential for causing water quality impacts, given that similar local historic mining activities resulted in the detrimental environmental impacts that persist today. The DEIR fails to conduct the necessary impact analysis. Instead the document asserts that impacts will be remedied by obtaining an expedited General Order permit from the Water Board (DEIR section 4.8 page 50). As Baseline points out, this process is insufficient:

"It is not adequate to state that the project will get permits without providing substantial evidence that the proposed action will not result in environmental impacts, particularly when very similar historic actions have been demonstrated to result in environmental impacts that have persisted for decades." (Baseline)

The revised DEIR must provide a valid and reliable analysis of the mine's waste products and identify specific and achievable mitigation measures to assure these water quality impacts are reduced to less than significant levels. Alternatively the revised DEIR must identify such impacts as significant and unavoidable.

HAZARDS - AIR QUALITY

10 The DEIR provides no evidence that the project's long-term NOx, ROG, and PM10 emissions will be mitigated to a less-than-significant level.

Grp 7-16

The DEIR fails to adequately mitigate the Project's air quality impacts. It relies on a bare minimum of mitigation measures recommended by the Northern Sierra Air Quality Management District (NSAQMD) to address air quality impacts, and these measures only address emissions during a one year period of construction. As we explain above, construction will certainly last longer than one year. In addition, the mitigation measures do not address the long-term emissions that will result from 80-years of mining operations associated with the Project. As a result, there is no evidence that the Project's long term emissions have been mitigated to a less-than-significant level, as concluded by Baseline Engineering Consultants (Baseline).

The revised DEIR must identify feasible and effective mitigation measures that address emissions from 80-years of mining to ensure that emissions are kept at less-than-significant levels. Otherwise, the EIR must identify these long term impacts as significant and unavoidable.

11 The DEIR Health Risk Assessment uses invalid meteorological data to characterize emissions.

Grp 7-17

Toxic Air Contaminants (TAC) are toxins which may cause or contribute to an increase in death or serious illness from cancer and other acute or long-term diseases. (See Health Risk Assessment Critique (HRA Critique), attached as a reference to this letter.) TACs may cause health damage even at extremely low levels, and are generated by, among other sources, vehicles, off-road equipment, blasting emissions, and fugitive dust. TAC ingredients include particulate matter from diesel emissions, asbestos dust, silica dust, heavy metals, ammonium nitrate fuel oil, hexavalent chromium, and radon – all of which would be produced by mining activity, and which can become airborne, traveling on wind currents toward population centers around Nevada County.

The data used for the Health Risk Assessment model in the DEIR that relies on meteorologic information about the quality, quantity, speed, and direction of travel of air toxins is not appropriate for the Grass Valley area. The DEIR model relies on data from the Blue Canyon site, an area with a significantly different meteorological profile than that of Grass Valley. Blue Canyon, located on Highway 80, bears little meteorologic resemblance to Grass Valley: it deviates from Grass Valley in elevation, temperature, rainfall, snowfall, wind speed, and wind direction. Using Blue Canyon's meteorologic data does not correlate with Grass Valley meteorologic data under most circumstances, and makes any TAC statistic derived from the model unreliable.

The DEIR's Health Risk Assessment must be revised using meteorological data applicable to Grass Valley in order to accurately assess the potential health impacts of the mine's toxic air.

12 Drill core testing for airborne contaminants is inadequate.

Grp 7-18

As documented in "Sampling Procedures" (Sampling) (attached as a reference to this letter), TACs silica and asbestos are insufficiently described in the DEIR. Even though several hundred tons of rock would be mined and surface-stored each day, none of the core samples taken from the exploratory drill cores were tested for the contaminant silica. It also appears that when the original core samples were taken, drilling was stopped when serpentinite, an asbestos bearing rock, was encountered and, since drill logs are not available for review, the depth and width of the asbestos-containing serpentinite deposits encountered cannot be determined.

The rock types identified in the mineralized zone contain substantial amounts of silica (silicon dioxide, quartz), and the tailings would contain fine particles of respirable crystalline silica, a TAC. The laboratory that the applicant used for all metals analyses, ACZ Laboratories, is certified to perform both silica and silicon dioxide tests yet not a single sample was analyzed for these parameters (Sampling).

The revised DEIR should provide a full set of data about the samples analyzed for silica and asbestos. To the extent this data set fails to analyze silica and asbestos, further analysis and revisions of the DEIR are required to adequately identify impacts.

13 The management of fugitive dust after it leaves the mining facilities is inadequate.

In 1986, asbestos was identified by the California Air Resources Board (CARB) as a TAC. CARB also determined that there is not enough scientific evidence to identify an asbestos threshold level below which no significant adverse health effects are anticipated (17 CCR 93000, Implementation Guidance Document 2017, CARB pg 1), (HRACritique),

Grp 7-19

As a TAC, asbestos, as well as respirable crystalline silica, fall under the non-criteria air pollutant category because they lack an identified safe "threshold level below which no significant adverse health effects are anticipated." There are no established limits for monitoring emissions of non-criteria air pollutants, silica and asbestos, into the ambient environment. The Health Risk Assessment is based on 30 years of exposure, so the cumulative effects from 80 years have not been addressed. Both silica and asbestos are inert substances not subject to environmental degradation that will have potential impacts beyond the 80-year project permit. (HRACritique)

The revised DEIR should establish asbestos mitigation protocols and robust monitoring systems of waste rock during transport and disposal to ensure the protection of workers and the public from the adverse health effects associated with the TACs, asbestos, and respirable crystalline silica. Without identifying clear and achievable mitigation measures, the DEIR must identify this as a significant and unavoidable impact.

HYDROLOGY AND WATER QUALITY

14 The proposed project would intentionally affect local groundwater resources.

The proposed Project would significantly affect local groundwater resources by dewatering the mine, lowering groundwater levels. The dewatered groundwater resources would be converted to surface water that is discharged into existing creek channels and quickly conveyed out of the area. The applicant's consultants have prepared a numerical groundwater model to attempt to predict how this proposed long term dewatering effort would affect overlying and surrounding groundwater levels.

Grp 7-20

An incorrect assumption was made in the groundwater model used to predict dewatering impacts, which led the DEIR to significantly underestimate groundwater drawdown, both in magnitude and areal extent. The groundwater model was calibrated based on pumping rates from the historical Idaho Brunswick Mine and only one water level measurement collected from the flooded (i.e., inactive) Union Hill shaft in 1956. Using only one water level measurement from 64 years ago to calibrate a complex bedrock aquifer system over a large region is inappropriate and introduces a significant amount of uncertainty to the model. (Baseline)

The revised DEIR must rely on a corrected groundwater model in order to accurately predict the extent of the well drawdown caused by the predicted 80 years of mine-dewatering and dewatered maintenance. Based on existing reports, the Project is likely to impact significantly more wells than the number of wells identified in the DEIR.(see "Safeguards for Well Owners and the Idaho-Maryland Mine", CEA Foundation) This is a significant impact that will affect hundreds of Grass Valley residents and must be addressed in a revised DEIR.

15 The basic constructs of the DEIR's groundwater model have significant errors and omissions making them unreliable.

The basic data needed to build a valid groundwater hydrological model are missing. The document "Review of the Idaho-Maryland Mine DEIR Groundwater Model" (Model Review) by Silberstein examines deficiencies in the model, as summarized here.

Grp 7-21

The mine water drains from several locations along Wolf Creek near Centennial Drive, and the DEIR provides only rough approximations of the mine water outflow rates from these areas. What's more, these outflow data are contradicted by more reliable records from previous studies which indicate ten times more outflow than the amount the DEIR discloses. (Model Review) Similarly, mine water inflow analysis is based on sparse mine water level data from the New Brunswick shaft. Only 12 water level measurements were taken at random times of the year between 2003-2007, and just 3 measurements in 2018-19). In addition, the utility of these measurements is incorrectly interpreted. The water level reaches a limit when it exceeds the level of the drains from which the mine water flows and doesn't reflect what could be substantial

Grp 7-22

inflow. Without a measurement of the outflow, the amount of inflow cannot be determined by the water level in the New Brunswick shaft. Essentially, no water balance assessment is provided.

Grp 7-23 Furthermore, data from private wells within the area is old and limited to just a few years. No usage data is provided, so seasonal variations in water levels are of limited use.

Grp 7-24 Critical data such as reduction in groundwater recharge from precipitation are also incorrectly calculated, failing to include the 75 acres of low-permeable mine waste to be dumped on the two sites.

Grp 7-25 Moreover, the groundwater model does not include the new access shaft, which would create a local area of groundwater drawdown. In fact, it appears that numerous existing mine features that are within a few hundred feet of the surface were also not evaluated in the ground water model. These mine features would contribute to the downward transmission of ground water from the near surface fractured rock areas.

These are all elements that are critical for constructing a reliable groundwater model to identify dewatering impacts.

Grp 7-26 In addition, there are three major faults and numerous minor faults in the mineral rights area. These impact the transmission of water and introduce a high level of uncertainty in the accuracy of a model which, as stated in the Groundwater Model report (DEIR Appendix K.3), assumes the geology is homogeneous. Common assumptions such as the correct anisotropic ratio for the groundwater transmission calculations may not be accurate.(Model Review, 3.g.)

Taken together, the groundwater model is seriously deficient with respect to data reliability, initial conditions, and modeling assumptions, calling into question its ability to accurately depict the Project's impacts.

Grp 7-27 Finally, use of modeling in a fractured rock system has limited value. Modeling that relies upon uniform rock, which is consistent from place to place, behaves in a more predictable fashion than rock that is in bedrock systems having multiple faults and irregularities. It is critical to provide for long term monitoring and extended protections due to the challenges inherent in modeling groundwater in this complex hydrogeologic setting.

The revised DEIR must provide accurate and adequate information and comprehensive analysis to determine the extent and the severity of the impacts upon groundwater resources and wells. Without this analysis, the revised DEIR must identify such impacts as significant and unavoidable.

WELLS AND WATER MONITORING

Grp 7-28 16 The DEIR inappropriately defers the collection of additional water monitoring data to the future.

The DEIR acknowledges that more groundwater level data is needed to assess the potential impacts of the proposed Project on groundwater levels. Mitigation Measure 4.8-2(a)(4) (DEIR section 4.8 pg 67) states that this needed water assessment be conducted "once dewatering of

the underground mine workings commences." This is internally inconsistent and would not be achievable. Once dewatering begins, it will be impossible to measure baseline levels. Consequently, this mitigation measure is impossible to implement. Mitigation measures under CEQA must be achievable, enforceable, and must be capable of actually reducing the Project's impacts.

The DEIR inappropriately defers the collection of additional data (via a Groundwater Monitoring Plan) to the future. CEQA does not allow the deferral of important studies necessary to characterize impacts because it denies decision-makers the information they need to make well-reasoned decisions regarding the viability and impacts of a Project.

Groundwater monitoring networks will need to be established in advance of the Project, and the resulting data will need to be included in the revised DEIR. The consequences of not committing to full compliance with General Plan Policy 2.17 are dire for local property owners who rely on groundwater. (Baseline)

17 Relying on fifteen monitoring wells to estimate the impacts on all water supply wells around the mine area is inadequate.

Grp 7-29

The DEIR relies on fifteen monitoring wells to estimate impacts on water supply wells but it does not explain how it arrived at this number of wells or their location. In complex fractured bedrock spread out over thousands of acres, monitoring water levels at fifteen locations could not possibly provide the needed data to ensure that groundwater impacts to hundreds of existing water supply wells in the Project vicinity are immediately identified and mitigated (Baseline,p12).

The revised DEIR must provide reliable data regarding the Project's monitoring regime in order to provide an accurate accounting of groundwater impacts.

18 Potential impacts to wells are underestimated and the proposed mitigations are inadequate.

Grp 7-30

The DEIR relies on a Well Mitigation Plan to allegedly protect wells from mining impacts. The Nevada County General Plan (Policy 17.12, item 1) states that:

*"In approving mining projects which **according to expert opinion** may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses:*

1) The County shall require the operator to guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water."

In contrast to the opinion of the DEIR consultant EMKO (DEIR Appendix K.9, p1), numerous experts have stated that there is the potential for a significant threat to water supply for wells in the area beyond those identified in the DEIR. Notably, Baseline Engineering unambiguously states that, *"...it is Baseline's expert opinion that the project may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses in a much wider area than is indicated in the DEIR."* (Baseline)

The DEIR relies on a Well Mitigation Plan to purportedly protect wells from potential mining impacts. Yet, the Well Monitoring Plan does not demonstrate that impacts would be mitigated.

BIOLOGICAL RESOURCES

19 Proposed mine dewatering activities have the potential to have a significant impact on dependent biological resources.

Grp 7-31 The DEIR fails to adequately address biological and aquatic resources, and hydrological impacts to those resources.

The DEIR's biological surveys exclude an entire reach of South Fork Wolf Creek (SFWC). Species of special concern are inadequately considered and qualitative data for benthic macro-invertebrates (BMI) is missing. (Wolf Creek Community Alliance (WCCA), Benthic Macroinvertebrate Analysis, 2007)

Aquatic resources are excluded through an inaccurate hydrological assessment of the full length of SFWC, ignoring the connectivity of the creek upstream and downstream of the culvert on the Mine property, thus failing to consider the movement of trout and other aquatic species.

Grp 7-32 Hydrological impacts due to mine dewatering into SFWC are inadequately studied, mischaracterized, or not considered. The initial dewatering rate of 2500 gallons per minute (gpm) would be followed by 80 years of subsequent operational dewatering at 850 gpm and as much as 2500 gpm. The DEIR fails to adequately consider this long-term higher rate of

Grp 7-33 discharge. Nor does the DEIR consider the seasonality of stream flow, loss of streambed or streambank habitat, changes in temperature, differences in Specific Conductance (EC), and

Grp 7-34 habitat for BMI. Drawdown of the water table due to dewatering is also underestimated and its impacts to meadow, wetland, and forest habitats are not considered. Further, the DEIR fails to consider chronic and cumulative impacts to BMI, trout, and other aquatic species, including

Grp 7-35 special concern amphibians. (WCCA)

Overall, because the DEIR does not adequately address biological and aquatic resources or sufficiently analyze hydrological impacts, this document must be revised.

20 Mine water discharges would overheat South Fork Wolf Creek.

Grp 7-36 Mine water temperature ranges between 14 and 15 degrees Celsius. The Project must not change the temperature of water discharged into the South Fork of Wolf Creek by more than 5 degrees Fahrenheit (2.8C) per NPDES requirements.(DEIR Appendix K.2, p108) Water from the mine will be pumped into the seven acre treatment pond. From there it will be run through the treatment facility and discharged into the creek. The DEIR's Hydrology study provides only a few data points (April and August of 2019 and Jan 2020) to determine the range of values for the creek flow and temp. However, over 15 years of monitoring by WCCA provides data

indicating that the temperature of the creek often falls substantially below 10C, and that these temperatures commonly occur during low flow times.

The revised DEIR must include studies that reliably predict the mine water's outflow temperatures from the treatment pond into SFWC. To do this, the EIR must include thermal modeling of the treatment pond, including the temperature impacts due to the treatment processing plant, flow through rates, cooling under different weather conditions, solar gain, evaporation, precipitation, etc. In order to avoid impacts to the SFWC and the species that inhabit the Creek, the revised DEIR must demonstrate that the discharge temperature and flow rates, combined with the temperature and flow rates of the stream over a range of conditions would not result in temperature changes in the stream in excess of 2.8C (5F) degrees.

GREENHOUSE GAS EMISSIONS AND ENERGY

21 The DEIR relies on an arbitrary threshold for greenhouse gas emissions.

Grp 7-37

The DEIR states greenhouse gas (GHG) emissions from mine operations would be just under 10,000 metric tons (MT) of GHG carbon dioxide equivalent (CO2e) per year. This number was chosen as a bright□line threshold based on other air districts in California that included Placer County, Sacramento Metropolitan Area, the Bay Area and Southern California. Neither the Northern Sierra Air Quality Management District (NSAQMD) nor the County have adopted numerical thresholds of significance for GHG emissions that would apply to the Project. The DEIR does not discuss the justification provided by each air district for adopting the 10,000 MT CO2e per year threshold, nor does it provide substantial evidence for applying this threshold to the project to demonstrate how it will achieve a fair share of the statewide GHG reductions goals for 2030 and beyond.

The DEIR must be revised to identify and provide justification for a GHG threshold of significance that will achieve the statewide GHG reductions goals for 2030 and beyond over the proposed 80 year lifetime of the mining permit. (Baseline)

22 The DEIR underestimates GHG emissions from haul trucks.

Grp 7-38

The DEIR states that the Centennial Industrial Site will be used for mine waste dumping to form "engineered fill" during the first 5 years of mine operations. The DEIR's analysis assumes that the Centennial Site remediation to remove toxic mine waste would be completed before the mine opens. However, since the remediation of the Centennial Site is not included in the DEIR analysis and, as indicated in the Project Description, may not be completed in any specified timeframe, "...it is speculative at best to assume that the Centennial Industrial Site will be available for fill placement." (Baseline)

To accurately account for the Project's GHG emissions, the DEIR should have assumed an additional five years of offsite hauling at the beginning of operations. This additional hauling would generate significantly more emissions than disclosed in the DEIR. This also holds true for criteria air pollutants as well.

The GHG emission should be updated in the revised DEIR to include the prospect of the Centennial Site being unavailable for mine waste dumping.

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23 Mining energy requirements would eliminate gains attained through the Nevada County Energy Action Plan.

The Nevada County Energy Action Plan calls for a 51% reduction in GHG emissions for electricity use by 2035, which is in close alignment with state goals. The Plan calls for residential energy reduction savings from building efficiency of 42 million kilowatt hours per year (kWh/Yr).

The DEIR states the amount of electricity required to operate the mine would be approximately 49 million kWh/Yr (DEIR p. 4.3-59), which would erase any residential electricity savings attained by the Plan.

Grp 7-39

The total non-residential electricity use of the county in 2017 was 53 million kWh/Yr. So, GHG emissions from this this one mining project alone would almost equal all other non-residential electricity use in the County and wipe out the projected 9 million kWhYr non-residential building efficiency savings.

Asking residents and business owners to cut down on their use of electricity while allowing the GHG emissions from the mine would be highly counter-productive and unfair. The DEIR must explain how the project intends to comply with the emission goals of the Nevada County Climate Action Plan.

The California Air Resources Board 2017 Climate Change Scoping Plan stated: "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." Given these facts, the DEIR must establish a net zero threshold for new GHG emissions from the Project and declare the project has significant and unavoidable impacts.

NOISE AND VIBRATION

Grp 7-40

24 Nighttime Noise Impact is Not Adequately Addressed.

The analysis "Acoustical Comments on Draft Environmental Impact Report, Salter Project 22-0039" (Salter) provides comments on the DEIR's analysis of the noise and vibrations for the Project.

Salter determined that nighttime noise is not adequately addressed in the DEIR. The DEIR outright dismisses the potential for noise impacts due to sleep disturbance and inappropriately excludes this consideration from the DEIR analysis. The combination of nighttime industrial activities amongst a community that currently enjoys low ambient noise levels represents a significant risk for Project noise to impact the community, annoy residents, and cause sleep disturbance.

A revised DEIR should provide a comprehensive analysis of nighttime noise impacts, identify these as potentially significant impacts, and identify appropriate mitigation, including limitations on nighttime noise, to protect nearby residents. (Salter)

25 Engineered Fill Operation Noise is Underestimated.

Grp 7-41

The DEIR underestimates operational noise from the Project's engineered fill operations (Impact 4.10-2). This 5 to 6-year long activity could generate noise levels at least 10 to 18 dB higher than predicted in the DEIR. This is a significant deficiency in the impact analysis. As such, the project's noise levels could be 20 to 35 dB louder than current median/background ambient noise levels, causing a severe impact. In addition, in several instances, the DEIR fails to adequately address impacts to sensitive receptors located farther away from existing roadways that currently have a lower background noise (Salter). The DEIR must be revised to correct these deficiencies and omissions.

26 Blasting Vibration Impact is Not Adequately Addressed.

Grp 7-42

The DEIR fails to adequately evaluate blasting vibration impacts (see Impact 4.10-4). Blasting operations have the potential to subject nearby residents to "strongly perceptible" and borderline "unpleasant" vibration on a regular basis for the rest of their lives. These perceptible and unpleasant vibrations must be considered a significant impact in the DEIR.

In particular, the DEIR fails to include crucial guidance from the U.S. Office of Surface Mining Reclamation and Enforcement Blasting Guidance Manual restricting blasting vibration during evening and nighttime hours. If blasting must be allowed at these sensitive times, the DEIR must incorporate adequate mitigation with a notably stricter limit at all sensitive receptors (Salter).

HAZARDS

27 Potential mine flooding and worker safety from groundwater occurrence in mine workings.

Grp 7-43

In the DEIR's discussion of the Union Hill Mine, it is noted, "The Union Hill Mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. During the post WWI period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of

the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine."

There are two important points to note in this discussion, (1) the Union Hill Mine is very close to the Idaho-Maryland at several levels; and, (2) there has been a possible weak hydraulic connection between the two mines, which is only logical.

There is no discussion in the DEIR of the potential impacts for the Idaho-Maryland Mine if flooding were to occur during mining. According to ITASCA's report (DEIR Appendix K.3, Figure 2-3), there are extensive abandoned mine workings above and adjacent to the Idaho-Maryland Mine that would remain flooded after the Idaho-Maryland is dewatered. If a conduit between these two mines were to open, for instance due to the widening of a fracture related to blasting vibrations or a seismic event, the flood of water into the Idaho-Maryland could be rapid and catastrophic for anyone working in the mine.

The DEIR must be revised to evaluate the potential risks of flooding during mining operations, including potential risks to mine workers. (CSP2)

28 Voluminous updraft from Mine ventilation air discharge may condense to form a water vapor cloud or fog resulting in a potential air traffic hazard.

Grp 7-44

The mine ventilation system would discharge 200,000 cfm of saturated air at 68F degrees from the top of the headframe with an upward velocity of 7.7 ft/sec. The headframe is located within the airport safety zone. Under some weather conditions, this large volume of air exhaust may form a persistent cloud plume, or fog, which could be a potential visibility hazard for aircraft. Also, the large mass of air moving upwards may create turbulence. In addition to aesthetic impacts, the DEIR should assess the potential hazards to aircraft of this large volume of saturated air (see MineExhaustMoisture report, attached as a reference to this letter).

29 The DEIR's evaluation of seismic hazards due to faults and mining is inadequate.

Grp 7-45

The mine project would target potential ore bodies that are more or less bounded by the Morehouse fault, the 6-3 fault (Weimar), and the Idaho fault, as well as numerous lesser faults. While the faults in this area are designated as being in a type C fault zone, with low seismicity and a low rate of recurrence, the DEIR does not analyze the effect that a seismic event would have on the mine or workers in the mine. (For further details, see FaultingHazards, attached as a reference to this letter) .

Throughout the 80 year life of the proposed project, expansion of mine works will remove 30 million tons of rock mass, and change the overall competency of the surrounding bedrock. In addition, several million tons of mine waste will be positioned over or near the faults. Finally, at the end of mine operations, the mine will re-flood, leading to an additional potential increase in seismic activity due to the re-introduction of hydrostatic pressures. (FaultingHazards)

The seismic reports discussed in the Geology section of the DEIR are not up to date and, even if updated, would not meet the requirements for a probabilistic seismic site analysis. (CSP2, p7)

Grp 7-46 The revised DEIR must include a complete and comprehensive analysis of the potential hazards due to seismic activity as a result of the Mine Project.

Conclusion

Grp 7-47 The DEIR lacks critical information necessary to identify all potentially significant impacts associated with a large underground mining project close to a populated area with complex groundwater and geologic conditions, and accordingly, fails to comply with CEQA requirements. As detailed above:

- The toxic legacy of the Idaho Maryland Mine at the Centennial site is incorrectly assumed to be already remediated in the DEIR for five resource areas, which leads to an underestimation of impacts, particularly in biology and hazards impacts;

Grp 7-48
- Health issues due to air quality and noise impacts are vastly underestimated;

Grp 7-49
- There is no proposal for managing the stockpiling and containment of waste and related runoff on site;

Grp 7-50
- The DEIR defers analysis of mine waste analysis;

Grp 7-51
- Asbestos and silica release are not evaluated;

Grp 7-52
- The groundwater model has significant errors, omissions, and is unreliable leading to a gross underestimation of groundwater and well impacts to nearby residents;

Grp 7-53
- Well monitoring is inadequate to evaluate impacts to the hundreds of existing wells in the project vicinity.

Grp 7-54 The DEIR lacks an accurate project description, lacks data and analyses needed to make informed determinations, and fails to provide effective and feasible mitigation measures. For these reasons, the document is inadequate under CEQA. The DEIR should be revised and recirculated to comply with CEQA.

Signers:

Sincerely,

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Ralph Silberstein
President, CEA Foundation

SIERRA CLUB
FOUNDED 1892

Richard Thomas
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WOLF CREEK COMMUNITY ALLIANCE
"Grass Valley - A creek runs through it."

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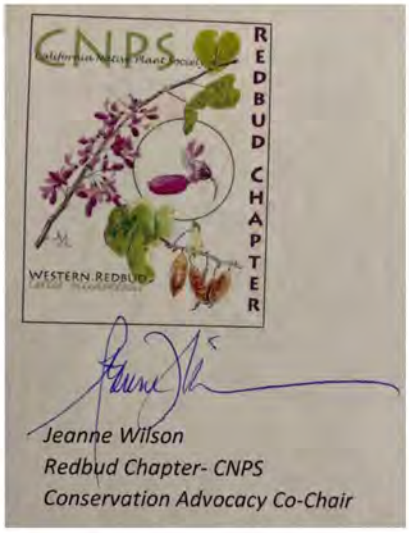



Donald I. Rivenes

Coordinator

***** References*****

Grp 7-55	Documents attached as a reference to this letter: • Review of the Idaho-Maryland Mine DEIR Groundwater Model.pdf
Grp 7-56	• MineExhaustMoisture.pdf
Grp 7-57	• FaultingHazards.pdf
Grp 7-58	• ASUR Plan Analysis.pdf
Grp 7-59	• Health Risk Assessment Critique.pdf
Grp 7-60	• Sampling Procedures.pdf
Grp 7-61	Documents cited and submitted under separate cover: • Baseline Environmental Consultant Report, Feb 15, 2022 (Baseline).
Grp 7-62	• Salter Report, March 9, 2022 (Salter).
Grp 7-63	• Comments on the Idaho-Maryland Draft EIR - 16Mar22, Center for Science in Public Participation (CSP2).

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Mar 30, 2022

To: Matt Kelley, Senior Planner
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Dear Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

Review of the Idaho-Maryland Mine DEIR Groundwater Model

This review of the predictions on the impacts to groundwater and wells for the Idaho-Maryland Mine is based primarily upon two DEIR documents: "Appendix K.2_Groundwater Hydrology and Water Quality Analysis.pdf" by Emko (EMKO) and "Appendix K.3_Groundwater Model Report.pdf" by Itasca (ITASCA).

1. Mine water Outflow Issues

The Hydrology Study uses data on mine water outflow rates that are based on approximations and estimates taken on only a few widely separated instances. These data are contradicted by more reliable historical data.

a) Estimated Mine Drain Flow Rates per DEIR
There are 3 identified discharge points for the mine at Wolf Creek: The Eureka Drain (ED-1), the 24" East Eureka Shaft Drain from the Navo building (IMD-1), and the East Eureka Shaft steel pipe from the Navo building (IMD-2). All drains are at or below 2502 feet elevation. A fourth potential drain is questioned as to source.

Grp 7-64

The ITASCA groundwater model used the following outflow data that was provided in EMKO Section 3.3.4, summarized here:

Flow data, ED-1:
"...in the range of 100 gpm (Condor, 1994)
"...only a few gpm" (EMKO Feb 2018, Dec 2018)
"...in the range of 20 to 25 gpm" (EMKO, April 17, 2019)
Flow data, IMD-1:
"...to be about 60 gpm." (Todd Engineers, 2007)
"...consistent with Todd..." (EMKO Feb 2018, Dec 2018)
"...approximately 100 gpm." (EMKO April 17, 2019)
Flow data, IMD-2:
"...in the range of 1-2 gpm." (EMKO Feb, 2018)
Flow data, D-1:
"...only a few gallons per minute" (EMKO? Feb, Dec 2018, April 2019)

This scant data is the basis of the outflow values of 60-125 gpm reported in the DEIR. [DEIR 4.8-19]

In order to establish a viable model of the hydrology for the mine, these critical questions should be unanswered:

- What is the actual measured outflow?

Grp 7-65
- How does it vary seasonally?

Grp 7-66
- What are the current outflows at the Wolf Creek drains under the current model?

Grp 7-67
- How do the model flows compare with the measured outflows?

b) Measured Mine Drain Flow Rates per Historical Records

More thorough and inherently precise measurements were provided by an earlier study. According to the Technical Assessment by James Askew Associates Inc, which was prepared in 1991 for the 1995 Empire Gold permit application to dewater the mine:

Grp 7-68

"ED-1 is estimated to be discharging 100 gallons per minute [gpm] of water. IMD-1 and IMD-2, which are located about 25 ft upstream of ED-1 **discharge in the range of 500 gpm to 1,200 gpm depending upon the season. Weir measurements are made by NID at IMD-1.** " [Askew, Section 5.3.2 Hydrology - Surface Water, pg 5.3.]

This implies that the total current discharge from the mine into Wolf Creek is likely in the range of 600 to 1300 gpm, depending upon the season, or almost ten times the amount reported in the DEIR.

The reported outflow in the EMKO report appears to be grossly understating the actual outflow. ITASCA did not report any water/mass balance for any of their simulations. Inherent in any numerical simulation, like ITASCA's, is a water balance (so that balance errors can be evaluated):

Grp 7-69
- Year-round accurate outflow measurements taken daily should be collected.
- Data should be collected for several years, including at least a year with normal rainfall and a year with low rainfall, in order to establish a baseline for groundwater modeling and impact assessment.
- Assessment of the fractional contributions of surface runoff and percolation can be better achieved by outflow volume logging.
- Water balances for the mine area should be provided and verified with the model.

2. Mine Water Inflow and Transmissivity Estimation Issues

a) The analysis of seasonal measurements of the level of water in the mine is flawed and does not support the transmissivity assumptions used in the model.

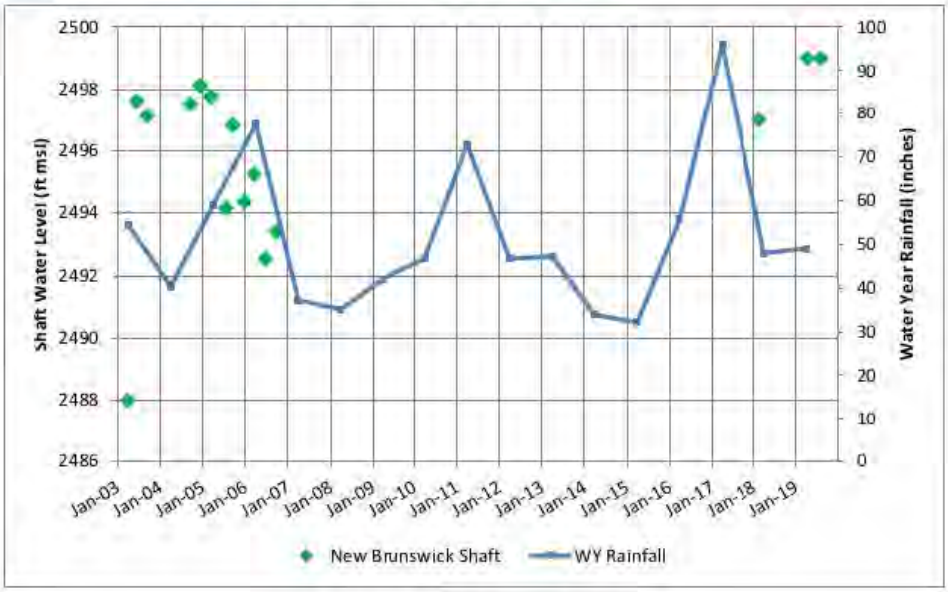
The Hydrologic study concludes that there are no correlations between the elevation of the water surface in the mine and the seasonal precipitation. It uses this point to support the position that there is little volumetric transmission of the water from the upper five hundred feet of fractured rock down into the mine. There are a number of reasons why the mine water level data is not useful as a basis for determining transmissivity.

Grp 7-70

First, note that the mine is flooded, and Measurements were taken in 2003-2007 and 2018-2019 at the New Brunswick (NB) Shaft (EMKO Fig 3-7). The water level in the mine, averages 2497 ft elevation. A few measurements have been lower, with one at 2488, and they have a maximum of around 2499 feet.
Second, note that minewater drains out of the mine at the drains located along the main branch of Wolf Creek, which is over 1.5 miles away from the NB Shaft: the East Eureka drain (IMD-1) is at 2497 ft elevation. A diagram of waterflow through the mine is in Figure 3-20 (EMKO).
Mine water level data - EMKO argues that the levels of water in the NB Shaft are independent of the seasonal rainfall and provides a graph showing both rainfall and NB Shaft water levels. (see Figure 3-7 below) Unfortunately, the NB Shaft data are very limited. Only about 15 measurements are provided. (Additional issues with the interpretation of the data are discussed in 4, below.) Note that of these, nine are at or above 2497', which is the drain level.
Obviously, if the water level exceeds the drain level, the water will flow out. The higher the NB Shaft level, the higher the rate of drain outflow. Thus, water levels in the NB Shaft would not provide a valid assessment of the amount of water flowing into the mine unless the outflow is measured.

Additionally, inflow and outflow is complicated by the fact that the near-surface region around the shafts in the area may be quite fractured and/or weathered and so seepage could occur through those more permeable zones.

Figure 3-7 Comparison of Shaft Water Levels with Rainfall



[3] IMMC used an estimated collar elevation of 2,750 ft msl. Since the collar elevation has been confirmed at 2,756 ft msl, the water elevations reported by IMMC (2007) have been increased by six feet in this report.

[4] One measurement, from June 2004, had a reported elevation of 2,581 ft msl, or about 100 feet higher than the other 12 measurements made by IMMC (2007). Review of the data presented by IMMC (2007) suggests that the anomalous June 2004 elevation may be due to a data recording or reporting error. Thus, it is not considered further in this report.

Grp 7-71

Grp 7-70

b) Invalid interpretations of seasonal precipitations vs mine water levels.

The seasonal interpretation of the New Brunswick Shaft water levels data is flawed. Even without considering the fact that the mine drain outflow rates will create an upper limit to the change in water levels in the NB Shaft, the data does not support the claims made in the EMKO report. EMKO claims that the data "*...demonstrate that the variations in the water level in the shaft do not occur on a seasonal basis, and that there is not a consistent correlation between water levels in the shaft and rainfall.*" [p30, and Figure 3-7]

There are several errors to this reasoning. First, note that data is sparse, with only 12 samples over a four year period in 2003-2006, plus a single sample in 2018, and two samples in 2019. Also note that the data is taken at

various times of the year, making direct year to year correlations limited. Also note that the annual rainfall year is based upon precipitation from October thru September, and a single data point for each year's rainfall is apparently placed on April 1, in the middle of that year's rain season. (Figure 3-7).

The chart lacks sufficient granularity to be useful. For example, a year's rainfall may be above average, but an NB Shaft measurement taken in December of that year may reflect that the first few months of the rainy season and the preceding last 6-9 months of the prior year's seasonal rainfall, which could be below average even though the rainfall year was recorded as above normal due to rains after December for that year.

In order to detect variation seasonally, it is more useful to look at the total rainfall in the months preceding any particular NB Shaft measurement. Thus, for the NB Shaft value at ~2497' elevation on around Feb 2018, the total rainfall from June 2017 through Feb 2018 was only 25.98". This is below normal. This correlates with a lowered level in NB Shaft. But the higher value of the 2017 total rainfall year reflects higher precipitation from more than 9 months earlier, giving the false impression of non-correlation.

Grp 7-73

Note also that the 2019 precipitation data is invalid according to precipitation records. The 2019 precipitation should be graphed at 68.15 inches, the correct precipitation for that period. But it is graphed at an incorrect value of 48 inches. Correcting the graph would show a direct correlation between higher precipitation and NB Shaft levels.

Grp 7-74

In addition, in close examination of the data for 2005, there is a clear drop in levels between the late Winter sample and the mid Summer sample followed by a Fall rebound. Also, again in 2006, there is a clear drop from late Winter to mid Summer followed by a rebound. Thus, data from both of those years **seems to imply that there actually is a seasonal correlation.**

Complicating this, an unknown amount of surface water or near surface percolation from seasonal precipitation may impact mine water inflows. However, the model report assumes that the entire seasonal pumping variations as reported in historical records are from surface leakage and not due to transmission through the bedrock: "*...during the rainy season, total pumping would probably be in excess of 900 gpm, perhaps in the range of 1,400 to 1,600 gpm. This estimate is based on the observation that the rainy season flows would increase by approximately 500 gpm for the historical Idaho-Brunswick Mine. [Itasca, pg 23 (35/93)]* ITASCA goes on to assume that this is not an indication of any bedrock transmissivity: "*...the excess inflows are due to surface-water runoff and percolation.*"

Grp 7-75

It seems surprising that an argument would be made that there is no seasonal correlation between mine water levels as a basis for determining low transmissivity while failing to consider that there are maximum water levels in the mine due to the drain elevation, and then acknowledge that there is a seasonal variation in pumping rates. Why wouldn't seasonal variations in pumping rates show up as seasonal variations in the mine water levels?

However, all of this may be a moot point because water migration downwards to depths may be delayed. Latency in water conductance time from surface percolation through the bedrock to depths may take a year or two and produce a smoothing effect on variations in mine water levels. This should be taken into consideration. Data for the years prior to 2003 would be needed to make that assessment.

Looking at the graph based upon annual precipitation over multiple years, there does appear to be a downward trend in shaft levels from 2004 to mid 2006. And the annual precipitations were notably below normal from 2003 to December of 2005. So the graph seems to show a multiyear downward trend in the NB Shaft levels with a clear seasonal variations signal also showing in the measurements.

Grp 7-76

In conclusion, the given EMKO conclusions from the comparison between NB Shaft water levels and seasonal precipitation using figure 3-7 do not hold water. The following are needed:

- Year-round logging of mine water level and outflow should be collected.

- Data should be collected for several years, including at least a year with normal rainfall and a year each with low and high rainfall, in order to establish a baseline for groundwater modeling and impact assessment.
- The data from the outflow and the data showing changes in mine water level can then be compared with granular rainfall data to legitimately make an assessment of the amount of seasonal variation in mine water inflows.
- The data could then be used to provide an estimate of transmissivity from the surface.

c) Data from monitoring of wells is old, limited to a few years, and with no well owner's usage data.

Grp 7-77

Monitoring of wells was conducted in 1995-2001, 2003-07 ((DEIR Appendix pg 4.8-11))
Well log records show seasonal variability but there is no data provided on how much of the well water level changes are due to dry season water usage and how much is a reflection of the actual lowering of the ground water level overall.

No recent well monitoring was conducted during drought years, and no assessment was made on the long term predicted impacts of climate change. These impacts include: warmer weather, changing rainfall amounts, shifting of rainfall periods, as well as consideration of water usage changes by property owners due to drought.

d) Surface Infiltration - Groundwater Recharge
The study fails to account for a substantial decrease in groundwater recharge from precipitation as a result of planned project development.

The EMKO hydrology report (Appendix K.2) claims that groundwater recharge due to surface infiltration would be essentially unchanged: "Thus, the project would not result in any appreciable new areas of compacted soils or impermeable surfaces that could substantially restrict or otherwise interfere with groundwater recharge." (p 121-122)

The analysis of changes in surface infiltration needs to include changes due to the engineered fill which covers 31 acres on the Brunswick site. In addition, infiltration would be reduced on the Centennial site, where the engineered fill will reduce permeability over 44 acres, bringing the total of near-impermeable engineered fill to 75 acres.

Grp 7-78

Even if Rise Gold abandons the use of the Centennial site for mine waste dumping, as in DEIR Alternative 2, there is a cumulative impact from the planned DTSC cleanup of reduced groundwater recharge in the areas of remediation tailings placement, based upon the draft RAP. (Note, the Final RAP has not been prepared.)
From DTSC Remedial Action Plan draft, p27 (52 of 623):

"The evaluation considers the on-site placement of tailings with elevated metals concentrations at a location that is not subject to surface water erosion or leaching (e.g., engineered fill with appropriate surface and subsurface drainage controls), and assumes that the engineered fill will have a simplified environmental attenuation factor of 100 for protection of surface water and groundwater quality, pursuant to the Designated Level Methodology (DLM; RWQCB, 1989 Jun)." and
"Consolidation and capping of the tailings as engineered fill with appropriate surface and subsurface drainage controls at a location away from Wolf Creek **will significantly reduce the potential for storm water erosion and infiltration.**"

In addition, the impervious surfaces of the Brunswick site will increase by 6 acres. (DEIR Project Description p14):
"The site currently has approximately 9 acres of impervious asphalt paving from previous land uses. Some of the existing asphalt areas will be removed and some will be reused. After completion of construction, the impervious surfaces and buildings will cover a total of approximately 15 acres of the Brunswick Industrial Site"

In total, 81 acres will have a reduced infiltration which should be included in the ground water calculations.

e) Estimated surface areas in the mine works have limited reliability

Estimates of groundwater transmissivity rely in part upon estimates about the subterranean surface area of the mine works as compared to the amount of mine water outflow. In the hydrology report the typical drift dimensions are assumed to be 7.5ft x 8.5ft (WxH) [pg 12]. However, in prior studies (DEIR Appendix F.2, Hydrogeological Overview, Geosolutions, 2008, p 9) 6ft x 6ft is used as the average cross section for stopes, raises, winzes, shafts, and drifts. Further details followed:

"*Because of the type of equipment utilized in mining during early to mid 1900s beneath Grass Valley it is reasonable to assume that drifts now located throughout the Idaho-Maryland mine have a cross sectional dimension of about six feet wide and six feet high.*" (p17)

Grp 7-79

The following must be explored:

- Given this contradiction, what is the justification for using the larger size for the surface area estimates?
- What is the source of the 7.5ft x 8.5ft measurement?
- How would the reduction of surface area per running foot from 24.5 ft (2H +W) to 18ft, or about 25%, affect the assumptions of transmissivity and the overall hydrological model?
- For the same amount of measured water outflow, a decrease in the transmitting surface area indicate a corresponding increase in transmissivity of bedrock.
- The model should use those higher values as a starting point.

3. Groundwater Model Elements

a.) Additional drawdown from the proposed new access shaft

A new access shaft is proposed close to the creek, but a cone of depression of groundwater levels like the one indicated at the New Brunswick Shaft is not shown. This new shaft is particularly worrisome because of its proximity to South Fork Wolf Creek.

The following questions must be answered:

Grp 7-80

- Was the new access shaft included in the Itasca ground water model?
- What is it's precise location? The shaft should be located on all maps.
- How far is it from South Fork Wolf Creek, a perennial stream?
- Is it within 100 ft?
- Was there analysis of the impact of the groundwater caused by the significant 60 ft deep excavation needed to build a permanent access shaft?
- Will this lead to more draw down of near surface groundwater?
- How will the creation of a large excavation and a new access shaft impact the near surface ground waters that feed SFWC?

b.) Does the model include numerous existing near surface features from the historical mining?

There is no indication that the many other near surface features of the Idaho-Maryland Mine were included in the analysis as additional areas of groundwater drawdown and/or conduits for water movement. In addition to the existing NB Shaft, the technical study "near surf.." identifies 14 other shafts, drifts, and drain features which pass through the more transmissive top few hundred feet of fractured bedrock. Each of these features will potentially impact the model by increasing transmission out of the top fractured rock zone. And most of them currently have water levels that are close to the surface. Hence the impacts would be noteworthy.

Grp 7-81

In addition, there are likely additional unidentified legacy mine near surface features which may affect the model. For example, note the unexplained sinkhole area noted in "Geotechnical Assessment of Near Surface Mine Features":

"The property owner indicated that approximately two years ago settlement of the ground surface was observed near the shaft location and was backfilled with boulders and soil. No documentation available. Additional settlement at the shaft location, measuring approximately four feet by five feet wide and 18 inches deep, was observed in February 2020." (DEIR Appendix H.6, p5)

There are numerous other nearby mines, both documented and undocumented. A survey of mines adjacent to and nearby, and a survey of reported sinkholes or other features identifying mining activity should be conducted to determine whether other near surface mine features may impact the groundwater model.

c) Did the mining model include all potential mining areas?

Grp 7-82

The model assumes the areas to be mined will be confined to very limited areas at depths greater than 1000' (DEIR Appendix K.3, pgs 11, 30). However, the mineral rights provide no restriction to mining anywhere within the 2585 acres and to within 200' of the surface. Furthermore, mining activity is indicated for within 500 feet of the surface:

"New underground workings, except for the service shaft and new ventilation raise, would be below 500 feet of the ground surface." (DEIR 3.19)

The groundwater model needs to assume that all areas within the mineral rights zone could be mined.

d) The model simulations were conducted with the assumption that mining would be only for 25 years.

All computer models that attempt to simulate real world conditions are based upon assumptions. Even minor differences between input data and actual real world conditions can result in errors that increase exponentially over time. The longer that the computer model is run, the greater the potential for deviation from actual outcomes.

Grp 7-83

From page 23 of "Appendix K.3_Groundwater Model Report" by Itasca: *"The predictive numerical simulations were conducted to assess the potential inflows to the mine workings, the effect on nearby domestic wells, and the potential effects on the creeks in the Mine area during mine development and production* ***between the assumed years of 2020 and 2045 (Year 1 to Year 25), which is the current mine plan."***

The permit request is for 80 years. Simulations in the model extended the calculations for 40 years to a total of 65 years. This is still short of almost 80 years of mining expansion.

The following must be considered:

- The model should be run for 80 years if possible.
- The model authors should justify the simple extension of the run times, along with an analysis of the reliability of a model over such an extended period of time.
- Examples of actual real life validation of similar numerical simulations over this extraordinary length of time and similar complex geological conditions must be provided.

Grp 7-84

- What is the model predictive success rate?

Grp 7-85

- How does the range of deviation change over longer periods?

Grp 7-86

- In order to assess the relevance and accuracy of the model, a listing of the initial conditions and additional data inputs must be provided.

Grp 7-87

- The complete model data used in the simulation is a key assessment component and must be included in the documentation.

Grp 7-88

g) Assumptions of transmissivity and anisotropy ratios based upon homogeneity of the rock are questionable. Faulting compounds the issue.

The model also relies upon assumptions regarding a K value anisotropic ratio of 10:1 horizontal to vertical conductivity. (Ten times more horizontal groundwater transmission than vertical transmission.) This value for anisotropy is very frequently assumed. It holds up particularly well for sediments and sedimentary rocks that haven't been tilted. It wouldn't necessarily hold for bedrock where most of the permeability is related to fractures.

There are numerous faults in the area. The Brunswick block, which is the primary mass of rock in which the proposed mine will operate, is an immense wedge of rock cleaved by 3 major faults, and numerous lessor subfaults.Within this zone are also numerous lessor faults. The mine project is targeting potential ore bodies that are more or less bounded by the Morehouse fault, the 6-3 fault (Weimar), and the Idaho fault.

The transmissivity through the fault planes may be significantly lower than the surrounding rock, and groundwater movement may be routed by these barriers. In the Hydrogeological Technical Memo prepared by GeoSolutions in 2008 for the Emgold project:

Grp 7-88

"Movement along interfacing rock blocks located within stress fields of this type usually produce grinding and crushing of materials within the interface of those structures. Materials produced by this action are commonly called mylonite and are a fine grained laminated material formed by extreme microbrecciation of the rock along the structural surfaces during movement. Because of the pulverization of these rock materials the mylonite generated by thrusting can behave like clay with very low permeability and hydraulic conductivity. Therefore, it is likely the migration of fluids through these structures will be limited or highly routed along lines or planes adjacent to the faults." (Emgold 2008 DEIR Appendix F.2 pgs 12, 14, 16)

This implies that the 6-3 fault and Morehouse faults, which trend generally in a North-South direction, may form effective walls constraining the horizontal movement of groundwater. The model uses the concept that groundwater movement is predominantly in the East to West direction. *"all of the geologic units were assigned with an anisotropy ratio (i.e., a K x /K z value) of 10."* [note: x is E-W horizontal and z is vertical]

The assumptions that the bedrock can be characterized by assuming homogeneity is a big assumption on its own, but the complexities of numerous faults which may or may not transmit or block groundwater flow raises the uncertainty to new heights. There are likely other faults east of the project which are not mapped. The model sensitivity analysis was run with the consideration that faults may be more transmissive of groundwater. The opposite case should be evaluated.

Grp 7-89

- The groundwater model should be run with faults having significantly lower transmissivity or K values.

Grp 7-90

- The model should be run with different anisotropic ratios having proportionally lower horizontal transmissivity.

Grp 7-91

- There are numerous lessor faults identified within the I-MTech_Report which should be added to the model. (see https://www.risegoldcorp.com/uploads/content/I-M_Tech_Report.pdf)

Grp 7-92

The following must be answered:

- What are the potential impacts when mining activities penetrate or remove portions of an impermeable fault wall?

Grp 7-93

- Are there measurable drop offs in groundwater surface topography that would indicate an impermeable or lessor permeable barrier?

3. Conclusion

Grp 7-94

The ITASCA groundwater model has significant issues with data reliability, initial conditions, and modeling assumptions, calling into question its reliability. The questions raised throughout this report must be answered in the DEIR. In particular, additional model runs should be conducted to verify the reasonableness of the

assumptions of the model in terms of mine water discharge, current well logs, and other more adequately measured data as detailed above. Additional sensitivity analyses should be conducted to look at how changing anisotropic values or applying decreased permeability at the faults would affect the predicted drawdowns. This would increase the likelihood that the model approaches reality.

The unreliability of the groundwater model in this situation cannot be used to conclude that groundwater impacts due to the Mine operations will be less than significant.

Thank you,
Ralph Silberstein, President
CEA Foundation

IM Mine Exhaust Moisture: Potential Hazard, Aesthetics, and Air Quality Impacts Background
CEA Foundation

Key points:

- The headframe is within the airport restricted area.
- The 200,000 cfm volume of air will exit 24/7 at 7.7 ft/sec, possibly causing turbulence for air traffic.
- Under some weather conditions, a persistent cloud plume or fog may form.
- Exit elevation of the headframe is roughly the height of the surrounding residential hills.
- A SW breeze will move this towards the airport, which is less than a mile away.

The Water Supply Assessment states that the Idaho-Maryland Mine will lose about 40,000 gal per day (gpd) of water due to saturated air venting out of the headframe at the Brunswick site.[1] The exhaust fan in the headframe at 165' above ground will emit 200,000 cfm. It will exit from a 23.52 ft diameter stack with a velocity of 7.7ft/sec. The temperature of the exiting air will be 293.15K, or 20C (68 degrees F).[2]

This large volume of saturated 68F degree air exhaust will potentially form a fog or a moisture cloud plume. Depending upon the rate of mixing, this would occur when weather is cool and the relative humidity is high because the temperature of the exiting saturated air will drop and be unable to carry the excess moisture. This will be much worse in cold weather when the humidity is high. For example, when the relative humidity is 80% and the temperature is 41F, the exhaust plume will need to continuously mix with over 12 times its volume to dissipate. If the temperature drops to 35F, the exhaust will need to be continuously mixing with over 40 times its volume.

Grp 7-95

A SW breeze will move this towards the airport, which is less than a mile away. Under some conditions, the cloud may persist. In addition, the exiting air column will also have an upward velocity which may impact air traffic due to turbulence.

*****

[1] *"Ventilation air flow through the mine working would become saturated with water vapor, consuming approximately 40,000 gpd (assuming 200,000 CFM airflow, 100 percent saturation of air at 68 degrees F).", DEIR "Appendix N_Water Supply Assessment.pdf", pg 10.*

[2] DEIR "Appendix E.1_AQ-GHG Report.pdf", (p371 of 1938)

"Base Elevation: 2,741.99 ft"
"Release Height: 50.30 m"
"Emission Rate: 1 g/s"
"Gas Exit Temperature: 293.15 K"
"Stack Inside Diameter: 23.52 ft"
"Gas Exit Velocity: 2.34 m/s"
"Gas Exit Flow Rate: 200,000.00 ft3/min [cfm]"
"Variable Emissions Scenario: None"

[3] DEIR "Project Description.pdf", p3-5. Map showing Brunswick Shaft location.

[conversions: 293.15 K = 68 F = 20 C, 2.34 m/s = 7.7 ft/sec, 200,000cfm = 5660 m3/min, 0.264gal/kg of water]
[Given 100% rel humidity, 20C, 760mm Hg, absolute humidity is 0.0173kg/m3.
Total moisture is 5660 * 0.0173 = 97.9kg/min. 97.9kg/min*0.264gal/kg = 25.85 gal/min
25.85 * 60*24 = 37,224 gal/day exhausted. = ~ 40,000 OK.]

RS, 2/1/22

Community Environmental Advocates FOUNDATION
PO Box 972, Cedar Ridge, CA 95924-0972
www.cea-nc.org / email: info@cea-nc.org

IM Mine Potential Seismic Hazard
March 20 , 2022

Grp 7-96

The mine project is targeting potential ore bodies that are more or less bounded by the Morehouse fault, the 6-3 fault (Weimar), and the Idaho fault. Within this zone are also numerous lessor faults, which are not shown in this image from pg 7-6, I-M Tech Report. For reference, note that Wolf Creek, South Fork Wolf Creek, and the Brunswick Shaft near the corner of Brunswick Rd. and East Bennett Rd. are shown below.

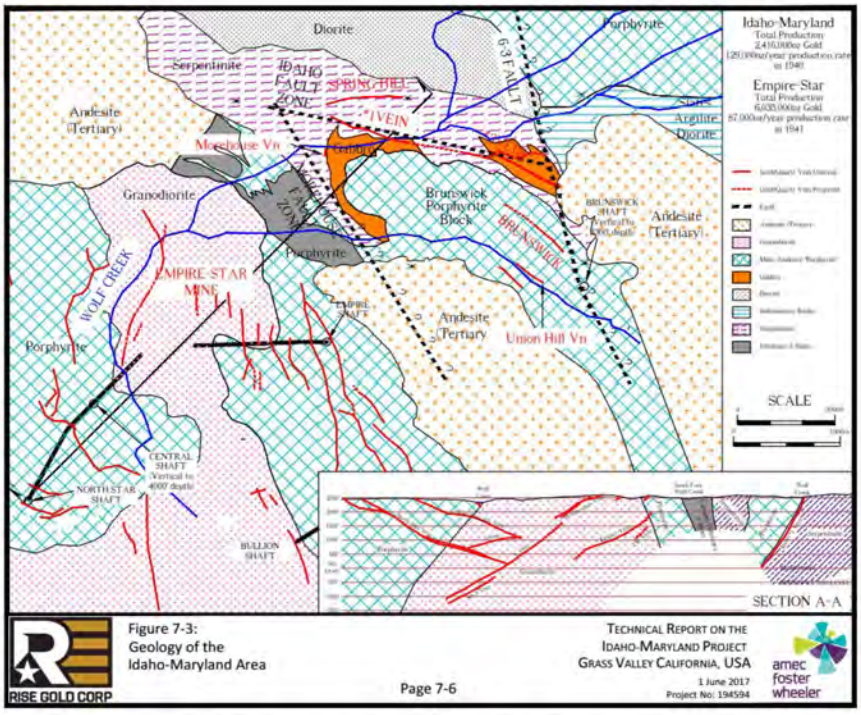


Figure 7-3:
Geology of the
Idaho-Maryland Area

Page 7-6

TECHNICAL REPORT ON THE IDAHO-MARYLAND PROJECT GRASS VALLEY CALIFORNIA, USA
1 June 2017
Project No: 194594

RISE GOLD CORP

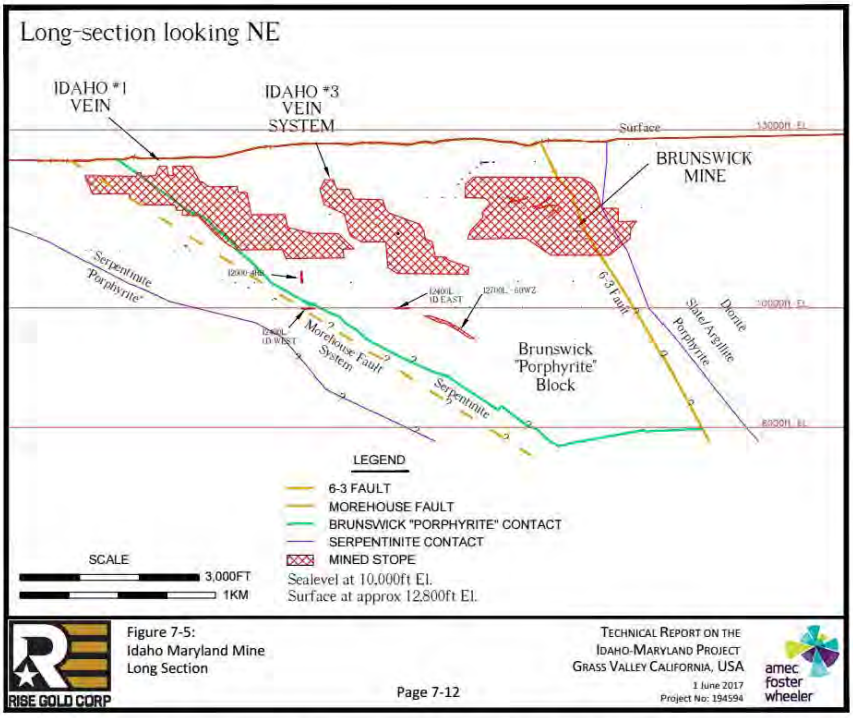
amec foster wheeler

As reported in "DEIR appendix H.2_Brunswick Fault Zone MP.pdf" prepared by NV5 dated Jan 16, 2020, the faults in this area are designated as being in a Type C fault zone, with low seismicity and a low rate of recurrence. The report concludes that: *"Fault rupture through the site, therefore, is not considered likely."* (DEIR H.2, p5)

However, no specific seismic study for the mine project was produced, and no further analysis was provided justifying the determination or assessing the potential of impacts from the proposed mining activities on seismicity or hazard risks.

Of note, mining may cause changes to the geologic fault zone stresses in the area. These changes may include localized significant decreases of total stable rock masses, degradation of load bearing capacity, reduced resistance to shear, and in some cases increased mass loading on or near fault lines.

For example, significant increases of localized bedrock loads will result from the disposal of mine waste. According to the plans, dewatering the flooded mine will initially offload about 3.4 million tons of water. Mining for the first 11 years will offload approximately 4 million tons. The surface at the Centennial site will receive about 1.6 million tons from this process, and the southeast portion of the Brunswick site will receive about 2.2 million tons or surface loading. Then, for about 65 years, another 24 million tons will be removed from the mine to be deposited elsewhere. In all, over 30 million tons will be removed from the subterranean mining area.



Particularly noteworthy is the potential for seismic activity on the 6-3 fault in the region of the proposed Brunswick mine waste surface dumping site. The 2.2 million ton mine waste pile loads up the reverse thrust block side of the fault that is over the nearby planned mining operations.

Grp 7-97

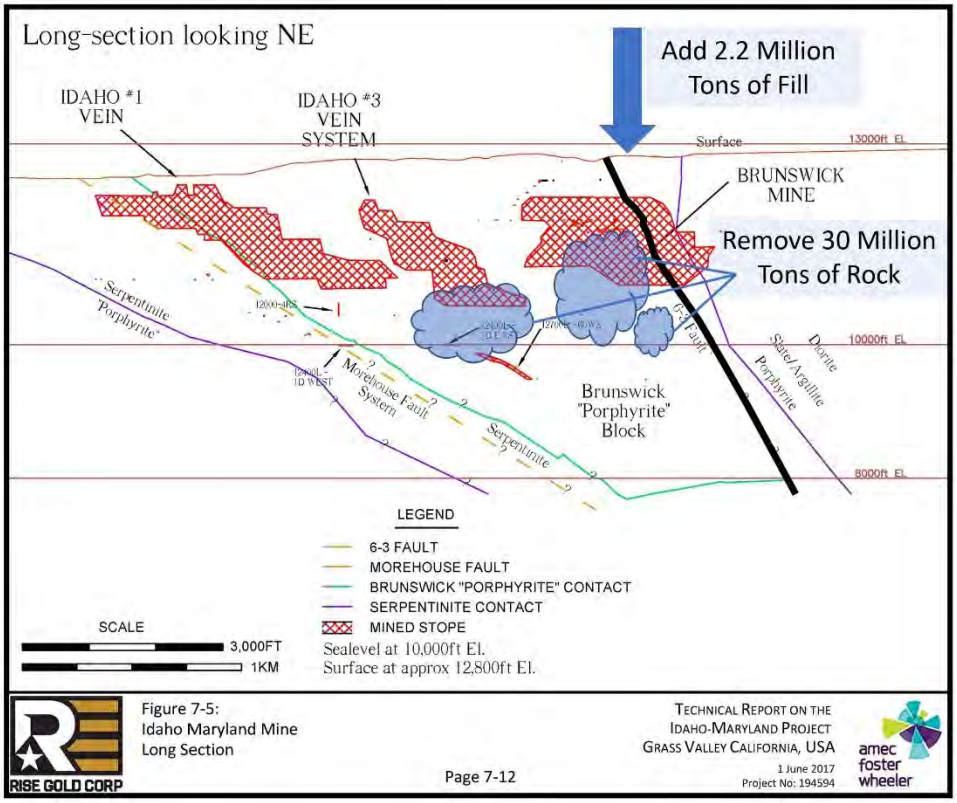
The above cross section diagram (Page 7-12, I-M Tech Report) shows the 6-3 Fault as a steep yellow line running at a 65 degree slope through the historic Brunswick Mine. Rise Gold has indicated that much of the mining will take place in the "Brunswick Block" located almost entirely to the east (left) of the 6-3 Fault. Using the information provided in the DEIR "Fault Zone MP" (Appendix F.2 p7) the 6-3 Fault is indicated by the red line overlaid on Sheet 1 of the DEIR Project Description, shown here. Notice the location of the mine waste pile, the flat-topped area to the right of the fault line and below (south) of the processing facilities, identified by the circled 8 on Sheet 1.



Throughout the 80 years of mining operations, expansion of mine works by tunneling and stoping will reduce the competency of the surrounding rock structure, vibrations from blasting will take place daily, and finally, at the end of mine operations, the mine will reflood, leading to a potential increase in the seismic activity due to the re-introduction of hydrostatic pressures.

This diagram shows the previous figure 7-5 cross section modified to show the approximate location of the 2.2 million tons of added fill on the right (east) side of the fault. The dewatering and removal of waste rock and ore will be mostly on the left (West) side of the fault.

Grp 7-98



Grp 7-99

A geological study of the seismic risks, including the risks from the proposed dewatering, mining, and mine waste dumping should be conducted and included in the DEIR addressing the following:

- How will the mining activities impact the seismicity of the area? **Grp 7-100**
- Will the integrity of near surface historical and proposed mine works be impacted by loading? **Grp 7-101**
- All buildings within the fault zones of the faults should be mapped in relation to the faults.
- An evaluation of the lessor faults as identified in the I-M Tech Report should be conducted. **Grp 7-102**

RS 3/20/22

/// calcs ////
[engineered fill: 1000 tons/day 20tons/truck x 50 trucks/day
5 years at centennial = 365,000tons x 5 = 1,825,000 tons or 1.8 million tons
6 years at brunswick = 365000 x 6 = 2,190,000 or 2.2 million tons
65 more years or 65 x 365,000 tons = 23,725,000, or 24 million tons.
Dewatering 2500 acre feet minewater. 2500Acft x43,560 cf/acft x 62.41 lbs/cf = 6,796,449,000 lbs = 3398224.5tons or 3.4 million tons]

Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

ASUR PLAN ANALYSIS

PREPARATION OF ASUR PLAN

Grp 7-103

This plan has been developed by Rise Gold, Inc, in response to the comments from the Northern Sierra Air Quality Management District, NSAQMD: "Pursuant to Health and Safety Code section 41511 and the ATCMs (discussed below), the NSAQMD will require that an asbestos sampling plan be developed and approved by the NSAQMD prior to its implementation. It should at least meet the requirements and specifications of ARB Method 435 (see https://ww3.arb.ca.gov/toxics/asbestos/tm435/tm435.htm). This has not been done. No sampling plan has been developed and approved by the NSAQMD." (*Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021*)

Rise Gold is listed as the author- no credentialed expert is credited even though they have a PhD Geologist on their team along with several Technical Advisors who are also geologists.

Rise Gold Inc. is incorporated in the state of Nevada. The state of Nevada does not require a license for geologists.

Grp 7-104

The sampling plan seems to be derived from "Air Resources Board Method 435, Determination of Asbestos Content of Serpentinite Aggregate (1991)". CARB also published the "*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate*" in April 2017 to further elucidate the complexities of asbestos testing in an effort to increase consistency and reliability between laboratories. The document states that: "If all parties involved in the collection, processing, and analysis of potential asbestos containing aggregate follow the guidelines specified in this document, more accurate and repeatable M435 asbestos content measurements will result." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017, pp i-ii*)

Determine what, if any of these recommendations were implemented

Grp 7-105

The sampling and testing will be done by Rise. "Sampling and analytical testing will be done on or off-site by trained and qualified persons under the direction of a State Licensed Geologist" (*ASUR Plan, Item #6, document pg 14 or pg 16 of 131*). Laboratories analyzing asbestos are accredited by NLVAP (National Laboratory Voluntary Accreditation Program). A licensed geologist can work with an Air Pollution Control Officer to identify naturally occurring asbestos (NOA) and create a management plan.

Was the author of the ASUR Plan a California licensed geologist?

So, the parties involved in sampling and testing are not well established as written in the ASUR Plan.

Can the geologist perform testing themselves, train analysts to perform testing or supervise testing? Will any of this work be accepted in a court of law? TBD from a regulatory agency

Mossman is not a licensed Professional Geologist or Certified Engineering Geologist in the state of California. None of the following members of the Rise Gold management team could be found in DCA database for licensure: Thomas Vehrs, Bob Gallagher, Mike Andrews, John Carlile or Alan Edwards (all listed as directors or technical advisors: searches performed under EG-Certified Engineering Geologist, GEO-Professional Geologist, GP-Professional Geophysicist, HG- Certified Hydrogeologist, and MT-Metallurgical Engineer categories). They all have extensive experience in mining, especially international work.

Andrew Kopania (author of the *Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project*) along with Vieira and Kull (NV5 authors of the *GeoTechnical Reports for Centennial and Brunswick Industrial Sites*) were located in the DCA database in order to validate search abilities.

The *Asbestos Sampling Memo (June 2020)* was prepared by Richard Lippoth. He collected the samples from Rise, analyzed the laboratory data and prepared the report. No California licensure is found for him under the Board for Professional Engineers, Land Surveyors and Geologists, DCA.ca.gov He is a one man show at Vergence Geo Services, Inc. with his resume listing work with Freeman-McMoRan and Alexco, a shared history with the Rise management team. His qualification described in the *Asbestos Sampling Memo* June 2020 is listed as geologist, Mr. Richard Lippoth, Reg. SME. SME is a professional organization: the Society for Mining, Metallurgy and Exploration.

COMPARISON OF PCM TO PLM TO TEM MICROSCOPY TECHNIQUES

Multiple types of microscopy techniques will be used to analyze asbestos content depending on the application of the results. For instance, airborne asbestos monitoring for miners' exposure will use air filtration capture followed by phase contrast microscopy analysis.

Grp 7-106

Bulk materials will be screened for asbestos using polarized light microscopy followed by transmission electron microscopy analysis for rolling inventory maintenance.

"TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. The term "TEM structures" is often used to describe asbestos fibers detected by this method. TEM is the method recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). However, TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units (OEHHA 2015.)" (*ASUR Plan, document pp 7 or pp 9 of 131*)

"Asbestos content by TEM structures will be converted into equivalent Phase Contrast Microscopy (PCM) units in accordance with the California Office of Environmental Health Hazard (OEHHA) 2015 Air Toxic Hot Spot Guidance Manual." (*ASUR Plan, Item #3, document pp 8 or pp 10 of 131*)

These different analyses each require unique sampling methods, sample preparation, sample sizes, and microscopy techniques. The results are not directly comparable between the methodologies.

PHASE CONTRAST MICROSCOPY (PCM)

Grp 7-107

"The most common methodology used for asbestos air testing is Phase Contrast Microscopy (PCM). This testing method involves using a PCM microscope to count the fibers present on the cassette filter in order to determine if the total fiber concentration is less than the EPA clearance level of 0.01 fibers/cc (fibers per cubic centimeter) "Asbestos sampling protocol cannot be used for objective data – OSHA." https://www.osha.gov/laws-regs/regulations/standardnumber/1915/1915.1001. Phase contrast microscopy enhances the contrast of transparent materials, while also filtering out background light. The air cassettes used for PCM contain a cellulose ester filter with a pore size of 0.8 um. Once the air sampling is complete, the sample is sent to an accredited laboratory. Alternatively, the samples can be analyzed on-site with a microscope for expediency, but these results will not be accredited. Whether in a lab or on-site, the filter is cut into a pie shape and prepped using a mix of vaporized acetone and triacetin. The sample is then placed on a PCM microscope where the fibers are counted up to 100 fields of view." (www.indoorscience.com, PCM vs TEM Asbestos Air Testing - Indoor Science, March 27, 2018)

Advantages:

2

- Technique is specific for fibers. It is a fiber counting technique which excludes non-fibrous particles from the analysis
- Technique is inexpensive and does not require specialized knowledge to carry out counts
- Analysis is quick and can be performed on-site for rapid determination of air concentrations of asbestos fibers
- Technique has continuity with historical epidemiological studies so that estimates of expected disease can be inferred from long-term determinations of asbestos exposure

Disadvantages:

- Test does not positively identify asbestos fibers. Other fibers may be included unless differential counting is used
- The smallest visible fibers are about 0.2µm in diameter while the finest asbestos fibers may be as small as 0.02 µm in diameter. For some exposures, substantially more fibers may be present than are actually counted.
- Cannot distinguish fibers less than 5 microns in length and 0.25 microns in width

This method is used for airborne fiber determination, not bulk material. It will probably be used for workers' exposure testing. Since OEHHA asbestos risk assessment has used studies involving PCM analysis, TEM results from bulk testing will be converted to PCM equivalent units.

POLARIZED LIGHT MICROSCOPY (PLM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Sep/17/2019 found in the *Asbestos Sampling Memo June 2020, pp 26 of 32*: "Sample preparation follows a standard CARB 435 prep method. The entire sample is dried at 135-150 C and then crushed to ~3/8" gravel size using a Bico Chipmunk crusher. If the submitted sample is >1 pint, the sample was split using a 1/2" riffle splitter following ASTM Method C-702-98 to obtain a 1 pint aliquot. The entire 1 pint aliquot, or entire original sample, is then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. If necessary, additional homogenization steps are undertaken using a 3/8" riffle splitter. Small aliquots are collected from throughout the pulverized material to create three separate microsope slide mounts containing the appropriate refractive index oil. The prepared slides are placed under a polarizing light microscope where standard mineralogical techniques are used to analyze the various materials present, including asbestos. If asbestos is identified and of less than 10% concentration by visual area estimate then an additional five sample mounts are prepared. Quantification of asbestos concentration is obtained using the standard CALARB Method 435 point count protocol. For samples observed to contain visible asbestos of less than 10% concentration, a point counting technique is used with 50 points counted on each of eight sample mounts for a total of 400 points."

Grp 7-108

This is a generalized description of the PLM analysis method, actual processes are not documented in the Asbestos Sampling Report June 2020 for the individual samples.

Advantages:

- Basic identifications were first performed by light microscopy so there is a large base of published information against which to check analysis and technique
- Analysis is specific to fibers
- Analysis is quick, requires little prep time and can be performed on-site if equipment is available

Disadvantages:

- Not all fibers present may be seen. This is a problem for very low asbestos concentrations where agglomeration or large bundle of fibers may not be present to allow identification by inference.
- Method requires a great degree of sophistication on the part of microscopist. An analyst is only as useful as his mental catalog of images. Therefore, a microscopist's accuracy is enhanced by experience. The mineralogical training of the analyst is very important. It is the basis on which subjective decisions are made.
- The method uses only a tiny amount of material for analysis. This may lead to sampling bias and false results (high or low). This is especially true if the sample is severely inhomogeneous. (heterogeneity)
- Fibers may be bound in a matrix and not distinguishable as fibers so identification cannot be made

TRANSMISSION ELECTRON MICROSCOPY (TEM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Aug/15/2019 found in the *Asbestos Sampling Memo June 2020, pp 21 of 32:* "Sample preparation followed a standard CARB 435 prep method. The entire sample was dried at 135-150 C and then crushed to ~3/8" gravel size. If the submitted sample was >~1 quart, the sample may have been split using a 1/2" splitter following ASTM Method C-702-98 to reduce the sample volume for pulverization. The remaining aliquot, or entire original sample, was then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. A representative ~60 mg aliquot of material was weighed out, and then placed into solution in a 500 ml beaker filled with distilled water. A known volume of the liquid suspension was filtered onto a 0.2 micron pore size Millipore mixed cellulose ester filter. The filter was then dried in HEPA filtered, Class 100 air on a clean bench. The filter was placed onto a glass microscope slide, sectioned, and collapsed in acetone. The collapsed filter was plasma-etched to remove10% of the filter surface and then carbon coated. The carbon coated filter was sectioned

Grp 7-109

3

and the sections placed onto 200-mesh copper TEM sample grids in dimethyl sulfoxide and acetone wick washers. After sufficient time to dissolve the filter material, the TEM sample grids were removed from the baths and placed into labeled sample containers.

TEM analysis was performed on a Philips CM-12 or JEOL 1200 transmission electron microscope operating at 80 or 100 kV. The sample was placed into the microscope where it was first scanned at low magnification to confirm that the distribution of material was reasonably homogeneous. High magnification analysis was performed using a two tier approach: 1) A relatively large area of several TEM grid openings for large asbestos fibers or fiber bundles, and 2) a relatively small area of a number of fields of view for individual asbestos fibers (fibrous particles exhibiting an aspect ratio greater than or equal to 3 to 1, and a length greater than or equal to .5 um). Detected asbestiform structures were subjected to detailed morphological and/or selected area diffraction analysis. If necessary, energy dispersive X-ray analysis was also performed. The length and width of each asbestos fiber was measured. From this data, a total volume and mass of asbestos observed in the scanned area is calculated, and extrapolated to a total weight percent asbestos for each sample."

At the top of the same letter is the statement: "Please find below the results for the TEM analysis of one or more bulk material samples. The analytical procedures were performed according to the EPA Test Method For the Determination of Asbestos in Bulk Building Materials - TEM method (EPA 600/R-93/116) modified for quantitative bulk soil sample analysis."

How was this method for bulk building materials modified for bulk soil sample analysis? These are rock cores.

In these analyses, an ~60 mg sample was suspended in 500 ml distilled water. Then a 0.5 ml aliquot was filtered for analysis. While TEM can identify fibers too small to be seen with PLM, the sample size is reduced by order of magnitude, 10^{-6}.

"Samples are first analyzed using PLM because a much larger (and likely more representative) mass of sample powder is analyzed using PLM than when using TEM. The mass of a M435 sample analyzed by PLM is approximately one million times greater than the mass of a TEM sample, but TEM has a resolving power of 500 to 20,000X magnification (compared to 50 to 1000X magnification by PLM). This higher resolving power enables TEM microscopists to distinguish and identify finer particles and fibers not seen with the use of PLM. For example, the California Department of Toxic Substances Control has used PLM, followed by TEM, as part of a tiered analytical approach to verify the absence of asbestos fibers determined by M435 PLM analyses in its Schools Program." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017 pp 23-24*)

Grp 7-110

This is a "potential" quantity of mass available for analysis by PLM vs TEM, not the actual mass analyzed.

Advantages:

- Fibers can be accurately identified-ability to distinguish between asbestos and non-asbestos fibers
- Small fibers can be detected

Disadvantages:

- High resolution may be selective for a specific size fiber and exclude others
- Actual amount of material examined is magnitudes less than quantity examined by PLM
- Sample heterogeneity impacts overall representativeness

Bottom line is that these methods are not comparable due to differences in sample preparation and microscopy techniques. These analyses contain inherent bias due to sample variability (lack of homogeneity), differences in sample quantities tested, magnification levels and individual microscopists' expertise.

COMPARISON OF RESULTS FROM ASBESTOS SAMPLING MEMO (June 2020) TO ASUR PLAN TEM RE-TEST (Nov 2021).

Grp 7-111

For the 42 samples analyzed during August and September 2019, asbestos was detected in 4 samples, 9.5% of total samples. This included two blanks, two Centennial site tailings and 38 rock core samples. Two samples were analyzed by TEM and the remaining 40 samples by PLM. Asbestos was found in the two TEM samples and two of the PLM samples.

"In 2021, Rise requested the 40 samples previously submitted to be reanalyzed using the TEM method." (*ASUR Plan, document pp 7 or pp 9 of 131*).

Actually, the TEM reanalyses were performed at the urging of the air district: ["As the NSAQMD wrote in its July 10, 2020 comments "The NSAQMD recommends additional TEM analyses of the above rock types (serpentinite, weakly ankeritized diabase/serpentinite, weakly ankeritized serpentinite and ankeritized serpentinite) in order to facilitate refinement of the preliminary risk assessment". The NSAQMD still sticks to this recommendation"]. (Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021)

In retesting of the 40 samples (two tailings and 38 pulp samples) analyzed by TEM, asbestos was detected in 14 samples. Unfortunately, the August 2019 samples tested by TEM were not retested by TEM in 2021. Thus, there is no quality control data regarding variability and reproducibility of results regarding TEM analysis between those two samples. The following chart is a comparison of asbestos found by TEM vs PLM. Detection limit for PLM is 0.25 weight% and the detection limit for TEM is 0.001 weight %. Non-detect samples from TEM re-testing have been excluded.

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Sample Number	Date Reported	PLM Result weight % Detection Limit 0.25	TEM Result weight % Detection Limit 0.001	% Difference PLM vs TEM	Location and sample drill core length (inch)	PCM equivalent units weight %
Y962827	Sept 17, 2019	<0.25		139	I-19-14 4.8	
	Nov 10, 2021		1.4			0.021
Y962828	Sept 17, 2019	<0.25		120	I-19-14	
	Nov 10, 2021		0.062		3.6	0.0
Y962833	Sept 17, 2019	<0.25		92	I-19-14-A	
	Nov 10, 2021		0.092		3.6	0.0
Y962835	Sept 17, 2019	<0.25		112	I-19-14A	
	Nov 10, 2021		0.071		3.6	0.0
Y962836	Sept 17, 2019	<0.25		15	I-19-14A	
	Nov 10, 2021		0.29		3.6	0.0
Y962837	Sept 17, 2019	<0.25		134	I-18-11 4.8	
	Nov 10, 2021		1.27			0.018
Y962840	Sept 17, 2019	<0.25		50	I-19-14 4.8	
	Nov 10, 2021		0.15			0.001
Y962843	Sept 17, 2019	<0.25		193	Centennial	
	Nov 10, 2021		0.004		tailings	0.0
Y962847	Sept 17, 2019	<0.25		55	I-19-13 13.2	
Duplicate	Nov 10, 2021		0.44			0.028
Y962980	Aug 15, 2019	N/A	3.1	N/A	I-18-11	0.035
	N/A				10.8	
Y962981	Aug 15, 2019	N/A	2.0	N/A	I-19-13 13.2	0.028
	N/A					
Y962991	Sept 17, 2019	<0.25		142	I-18-11	
	Nov 10, 2021		0.042		6.0	0.042
Y962992	Sept 17, 2019	0.75		5	I-18-11 3.6	
	Nov 10, 2021		0.79			0.069
Y962993	Sept 17, 2019	<0.25		198	I-19-13A 4.8	
	Nov 10, 2021		0.0009 (0.001 at 3 sf)			0.003
Y962994	Sept 17, 2019	<0.25		63	I-19-13A 4.8	
	Nov 10, 2021		0.13			0.0
Y962999	Sept 17, 2019	2.5		164	I-19-13A	
	Nov 10, 2021		0.01		4.8	0.038

Overall, 16 samples, 40%, had asbestos greater than the TEM detection limit of 0.001 weight %.

Eight of the 40 samples, 20%, had asbestos >0.01 PCM equivalent units Weight %.

NOTE: sample Y962994 had a TEM result of 0.13 weight % yet zero result for PCM equivalent units. Data was notated: "Actinolite asbestos detected. Concentration per Millions of Fibers per gram: 29 for fibers >5µm in length. Possible contamination." This same situation occurs for samples Y962828, Y962833, Y962835, Y962836 and Y962843.

Two samples for TEM analysis originally sent to the laboratory on Aug 8, 2019 were described as rock cores with date analyzed as Aug 15, 2019. The 40 samples for PLM analysis were described as rock cores and were originally sent to the laboratory on Sept 3, 2019 with date analyzed as Sept 17, 2019. For retesting, 40 samples described as pulverized rock were submitted to the laboratory on Sept 14, 2021 with date analyzed as Nov 10, 2021. The two samples originally tested by TEM, Y962980 and Y962981, were not retested in November 2021. All of these samples were stored somewhere for two years before being retested. The actual age of the samples is unknown since drill core logs are not available. Rise performed exploratory drilling between 2017-2019.

SAMPLE POPULATIONS

Grp 7-112

Not counting the two grab tailings samples from the Centennial Site and the two blanks (carbonate landscape rock), the average overall length of the sample cores tested was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available; therefore, it is impossible to determine the depth or width of serpentinite deposits encountered. Asbestos sampling was extremely limited. Centennial tailings were only identified by a grid number-no information as to quantity, location, depth, etc. There are labeling errors: 1) *Asbestos Sampling Memo June 2020, Appendix A*- First photo is mislabeled Y962880 instead of the correct label Y962980 and 2) sample Y962838 is located on drill hole I-19-12 on Sheet 2

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Mine Geology and Asbestos Samples (*Asbestos Sampling Memo June 2020*) but is listed as being from drill hole I-18-12 in the *ASUR Plan, Appendix C, pp 55 of 131.*

DUPLICATE ANALYSIS

Y962847 and Y962981 are duplicate samples. How does a result of 0.44 TEM weight % and 2.0 TEM weight % calculate out to the same PCM equivalent unit result of 0.028 weight%? (*ASUR Plan, Appendix C, document pp 57 of 131*)

These two separate samples Y962981 and Y962847 were quality control duplicates. These were two different samples, Y962981 was initially received as a rock core sample and was only analyzed by TEM on 8.15.19. The results yielded 22 chrysotile structures <5µm and 17 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 2.0 (*Asbestos Sampling Memo, June 2020, Appendix B, pp 23 of 32*).

The duplicate sample, Y962847 was initially received as a pulps sample and was tested by PLM on 9.3.19 with <0.25% result. This sample was retested by TEM on 11.10.2021 and yielded 233 chrysotile structures <5µm and 10 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 0.44 (*ASUR Plan, Appendix B for Asbestos TEM Laboratories Report, pp 110 of 131*).

Grp 7-113

Yet, the ASUR Plan lists these results as identical with the same Structures/nanogram at 3.0 and the same PCM Weight % at 0.028% (*ASUR Plan, Appendix C, pp 57 of 131*)

The weights used for sample preparation are 62.5 mg for Y962981 and 58.9 mg for 962847, a difference of 5.9%. But the difference in calculated asbestos weight concentration is 128%. Sample Y962847 has more than 10 times the number of chrysotile structures.

A 6% lower weight yields a 10 times higher structure count but the same PCM equivalent units????

Only one of these samples was included in the four total samples used to calculate the content in serpentinite samples. Which one? Who picks which one? Can the quality control sample, as a separate sample, be excluded from the analyses? (*ASUR Plan, Appendix C, pp 57 of 131*)

Comparing the results for the duplicate sample, Y962847, by TEM analysis yields 0.44% by weight compared to sample, Y962981 at 2.0% by weight, again yielding a 128% difference. Even using the same analytical test procedure (TEM analysis) yields unsatisfactory QC results.

NOTE: The only definitive conclusion from all of the asbestos testing is that:
asbestos was found in all of the serpentinite samples in addition to being found in samples of weakly ankeritized diabase/serpentinite, weakly ankeritized serpentinite, diabase and porphyrite at levels >0.01% PCM equivalent units (*ASUR Plan, Appendix C, pp 55-57 of 131*).

Grouping the samples by lithology in an effort to dilute the overall asbestos content of the group does not negate the asbestos content of the individual sample and its potential for harm. (*ASUR Plan, Appendix C, pp 54 of 131*)

QUALITY CONTROL ISSUES

The laboratory report for retesting of 40 sample by Asbestos TEM Laboratories, Inc. is labelled Report NO. 375516 rev.1

Why was the report revised? Where is the original for comparison?

Grp 7-114

Per documentation provided, no blind blanks or blind duplicates were performed. No documented cross check verifications from second analyst or second microscope were performed on individual samples. Two analysts performed the 40 sample TEM re-tests. The first analyst tested the first 18 samples, followed by the second analyst for next 13 samples, first analyst again for one sample, second analyst for remaining 8 samples. No time stamp for each sample, thus unable to determine if samples were analyzed in the order listed according to laboratory sample ID.

Two of the TEM samples had grid opening damage, Y962984 and Y962988.

Eight of the 40 samples were notated as having "possible contamination" with two types of contamination listed, chrysotile for two samples and actinolite for 6 samples. Twenty percent of the samples had "possible contamination", 5% by chrysotile and 15% by actinolite.

TOXICITY

Grp 7-115

CHRYSOTILE VS AMPHIBOLE ASBESTOS

What if these samples did not have "possible contamination" but contained actual naturally occurring actinolite (amphibole) asbestos?

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Upon retesting by TEM, ten samples (25%) indicated amphibole asbestos which has a much higher cancer potency than chrysotile asbestos.

Particularly controversial is the question of whether chrysotile asbestos is less potent for the induction of lung cancer than the amphibole forms of asbestos (e.g. crocidolite, amosite and tremolite), which has sometimes been referred to as the "amphibole hypothesis" (Cullen, 1996; Stayner et al., 1996; McDonald, 1998). This argument is based on the observation from experimental studies that chrysotile asbestos is less biopersistent (i.e. has a shorter half life) in the lung than the amphiboles... [The Working Group noted that the lower biopersistence of chrysotile in the lung does not necessarily imply that it would be less potent than amphiboles for lung cancer.] https://www.ncbi.nlm.nih.gov/books/NBK304374/

"The amphiboles are more likely to be associated with mesothelioma than is chrysotile, or white asbestos, which has a two to four times less potent risk of mesothelioma: however, the risk for development of lung cancer is equipotent for all types of asbestos. Chrysotile accounts for more than 99% of the world production of asbestos and commonly is contaminated with tremolite and other asbestos fibers." (Walker MD, Christopher, Pleural Neoplasms, Muller's Imaging of the Chest, 2019 Retrieved from ScienceDirect.com 02.22.2022)

POTENTIALLY TOXIC ELEMENTS

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases." https://doi.org/10.1016/j.chemgeo.2020.119896

Grp 7-116

"Iron ions on amphibole types of asbestos react with epithelial lining fluid in the lung and generate reactive oxygen species that induce toxicity, and oxidant stress may lead to DNA damage. There is a direct relationship between biopersistence, which is determined by fiber length and chemical composition, and toxicity. Longer, thinner fibers are more toxic because they are not cleared by the AMs and therefore persist in the lung. Fibers longer than 15μm are particularly toxic and bioactive. They are not completely engulfed by the macrophages, leading to release of lysosomal contents, cytotoxicity, oxidant stress, and stimulation of inflammatory and growth factor pathways." (Harkema...Haschek, Fundamentals of Toxicologic Pathology, Chapter 14-Respiratory System (Third Edition), 2018 pp 351-393. Retrieved from ScienceDirect 02.22.2022 https://doi.org/10.1016/B978-012-809841-7.00014-9)

Many of these samples have high metals content, especially iron. Chart this

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (Inorganic Extended Qualifier Reports pp. 389-407 and 458-484, Appendix D, Groundwater, Hydrology and Water Quality Analysis Report-Appendices)

Grp 7-117

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. These analyses were performed in November 2019. This means that all samples were tested at least 9 months beyond their expiration date, probably more.

Shouldn't valid data be used when evaluating the health risks to the community from these TACs, especially when these metals have to ability to potentiate the effects of asbestos?

MATERIAL SAMPLING LOGISTICS

"The sampling will be done from the transfer point between the skip and silo and may be taken either manually or with an automated sampler." Illustrated by Figure 2 (*ASUR Plan, document pp 14 or pp 16 of 131*)

Grp 7-118

According to correspondence between the Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner of Nevada County on February 10, 2021, the APCO states: "A key component of method 435 is the protocol for collecting representative samples. It is improper to simply pull out the laboratory portion of Method 435 and say that Method 435 is being used. Method 435 states, "1.2 Applicability. This method is applicable to determining asbestos content of serpentine aggregate in storage piles, on conveyor belts, and on surfaces such as roads, shoulders and parking lots." Then it specifies even more clearly, "3 APPLICABLE SOURCES. This method can be used to obtain bulk material sources from three types of sources: 1. Serpentine aggregate storage piles. 2. Serpentine aggregate conveyor belts 3. Serpentine aggregate covered surfaces...In aggregate, a large degree of homogeneity has already been achieved during the aggregate's production."

Does pulling samples at the skip drop point into the silo meet the above stipulated criteria for Method 435 sampling, does this method qualify as a conveyor belt?

Grp 7-119

Who would be in the silo at point 3 in diagram as shown on document pp 14. (*ASUR Plan*) to obtain a sample manually?

Grp 7-120

"It is recommended that sampling be done at point closest to end of processing." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, pg ii*).

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This point in the silo may be adequate for barren rock samples but not tailings samples comprised of ore rock regarding the "point closest to end of processing," as stated above.

What will be the timing/spacing of the individual 3 samples taken for each composite per 1000 tons? Beginning, middle, end or every 333 tons? Beginning and end sampling method would mean that samples would overlap (beginning, end) and (end, beginning) samples per 1000 tons. Weighting sampling at these points would not be representative of the entire batches.

Will barren rock and ore rock be analyzed separately or combined in a composite (3 samples will be composited per 1000 tons of rock each day (*ASUR Plan, document pp 13 or 15 of 131*)? If barren rock and ore rock are to be placed in different compartments of the concrete silo, how will you be able to determine which material is contaminated, if asbestos content >0.01% PCM equivalent units is later found in the rolling inventory?

Grp 7-121

The concrete silo is divided into three compartments, one 1000 tons area and two 400 tons containment areas. The ore rock would flow through the larger compartment and then be conveyed to the ore processing plant for pulverization into tailings, while the barren rock would be loaded into haul trucks for transport.

How would you determine if the contaminated material was from the ore rock or the barren rock if the composited sample contains both materials? Rise would have to assume that all material from last non-detect test (per 1000 tons batch) to the next non-detect test (per 1000 tons batch) is contaminated.

Using a weighted average taken over three months of 1000 tons per day ore rock (90,000 tons) and 500 tons per day barren rock (45,000 tons) allows for significant dilution of asbestos per batch. Will an individual batch that fails TEM analysis be allowed to remain among the passing TEM analyses batches?

ROLLING INVENTORY MAINTENANCE LOGISTICS

Pg 13 (pp 15 of 131), ASUR Plan item 4: "Analytical determination of a materials status as Asbestos Containing Material would be done using Polarized Light Microscopy (PLM) in accordance with ARB Method 435 pursuant to 17 CCR 93106 (h)(2) with a detection limit of 0.25% asbestos"

Pg 13 (pp 15 of 131), ASUR Plan item 5: "Analytical determination of asbestos content, for the purposes of maintaining an Asbestos Inventory, would be done using Transmission Electron Microscopy (TEM) method in accordance with the EPA/600/R-93/116 method. Sampling for the Asbestos Inventory would be done by compositing at least 3 random grab samples from the barren rock or sand tailings for every 1000 tons of material."

Grp 7-122

But on page 8 (pp 10 of 131) of the ASUR Plan are the statements:

4) An Asbestos Inventory of all mined materials will be maintained and include a 3-month rolling average of asbestos content in equivalent PCM units.

5) An Engineered Fill Placement Plan will be maintained to ensure that adequate non-Asbestos Containing Material, as determined by PLM testing, is available for Surfacing Applications.

If all mined material is tested by TEM and converted to PCM equivalent units, then how can Rise maintain an Engineered Fill Placement Plan based just on PLM testing? There is no comparison or conversion factors of PLM measurements to TEM measurements. (Only TEM measurements are used to convert to PCM equivalent units)

"A rolling three-month weighted average of asbestos content of mined materials brought to surface and materials used as Engineered Fill will be maintained in the Asbestos Inventory. (*ASUR Plan, document pp 15 or 17 of 131*)."

"Arrangements will be made to ensure that analytical data is received and entered into the inventory within 2 weeks of sampling" (*ASUR Plan, pp 15 or 17 of 131*)

Grp 7-123

Will a new weighted average be calculated with each 1000 tons of material added to the inventory? WHERE WILL THIS MATERIAL BE STORED? WILL 1000 TON INDIVIDUAL BATCHES OF ORE ROCK ALONG WITH 500 TONS INDIVIDUAL BATCHES OF BARREN ROCK BE MAINTAINED? HOW MUCH MINING WILL BE PERFORMED DURING THAT TWO WEEKS OF TURN AROUND TIME? HOW WILL THE AMOUNT OF "POSSIBLY CONTAMINATED" MATERIAL BE DETERMINED?

For example, Y962847, would have initially passed the screening PLM method of testing. However, the material would have failed when tested by TEM during rolling inventory. Material surrounding this sample in the 90-day rolling inventory would be unfit for engineered fill or aggregate transport.

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WILL THE SAME SAMPLE ANALYZED BY PLM BE RE-TESTED USING TEM OR WILL RANDOM SAMPLES FOR EACH TEST (PLM and TEM) BE UTILIZED?

FUGITIVE DUST EMISSIONS ABOVEGROUND

Grp 7-124

The 3-month rolling inventory will consist of 1000 tons of tailings for engineered fill per day multiplied by 90 days equals 90,000 tons plus 500 tons of barren rock for engineered fill per day multiplied by 90 days equals another 45,000 tons. 500 tons of tailings will be deposited underground in CPB.

How will the 500 tons designated for CPB be determined? How will this material be culled from the rolling inventory? (Assuming that any tailings containing asbestos would be the most suitable for underground CPB placement)

Grp 7-125

Where will this 135,000 tons of materials be stored and how will it be loaded for transport to Centennial, Brunswick or outside vendors? Have the fugitive dust emissions for the storage and loading been calculated and included in PM emissions analysis and incorporated into Health Risk Assessment model?

Grp 7-126

The Air Quality Report calculates emissions based on loading from an enclosed area: "Barren rock will be transported from the concrete silo using a series of chutes and conveyors to a fully enclosed truck loading building." (*Air Quality and Greenhouse Gas Emissions Analysis, Appendix B, Health Risk Assessment, Earthwork and Material Handling Nov 2021, document pp 24*) This statement does not account for rolling inventory procedures.

Grp 7-127

On document page 35, *Noise and Vibration Report, Rock Bin Conveyors and Barren Rock Loading* is the statement:
"The existing concrete rock silo will be reused. A chute and conveyor system will transfer barren rock from the silo into trucks for transport as engineered fill. The conveyor system and truck loading area will be inside a building adjacent to the headframe. A chute and covered conveyor system, approximately 335 feet long, will transfer gold mineralization from the silo to the process plant."

On document page 11, *Centennial GeoTechnical Report*: "The conveyor system and truck loading area will be inside a small building adjacent to the headframe."

On document page 14, *Centennial GeoTechnical Report, Table 4, Buildings* lists the Rock Truck Loading building as 1700 square feet with a maximum height of 20 feet.

Is the building large enough to accommodate the 45,000 tons of barren rock rolling inventory and room for front-end loading into haul trucks from that inventory? What is the ventilation system for this building?

Grp 7-128

On document page 36 *Noise and Vibration Report, Process Plant* is the statement:
"Gold mineralization hoisted from the Brunswick shaft will be placed in the existing concrete silo located on the Brunswick property before processing begins. Gold material will be transported from the concrete silo using chutes and conveyors to a fully enclosed process plant....Sand tailings (waste) from the gold recovery process will be dewatered and used for either backfill for the underground mine or stockpiled for transport and use as engineered fill. Sand tailing during backfilling will be transferred to the paste backfill plant, where particles will be dewatered and mixed with cement into a paste....Sand tailings not used for backfill will be either directly loaded into trucks in the process plant or stockpiled inside the building. Stockpiled sand tailings will be loaded into transport trucks with a front-end loader during daytime hours. Sand tailings not used as underground backfill will be transported for use as engineered fill."

(Document pp 39, *Noise and Vibration Report, Table 9 Hours of Operation*):
"Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years"

(Document pp 17, *Applicants Project Description, Table 7, Hours of Operation*):
"Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years"
This is confirmation of "outside loading" across documents.

Will this loading occur inside or outside? Will it be stockpiled inside or outside? If these procedures change due to maintenance of rolling inventory storage: will noise levels increase, will amounts of fugitive dust increase? What is the potential for all equipment and storage areas to be contaminated with asbestos? What level of asbestos found by TEM testing in the 90 day rolling inventory will trigger decontamination of all equipment: conveyor belts, processing plant, cement plant, etc.?

Grp 7-129

Will these two components of the engineered fill be kept separate? Otherwise, how will the engineering firm determine correct ratios for mixing to ensure stability upon engineered fill placement?

Recommendations from NV5:
"2. Crushed blast rock with a maximum dimension of 6 inches may be blended into the sand tailings to produce engineered fill material at a ratio of up to 2 parts blast rock to 1 part sand tailings. A rock and sand ration greater than 2:1 may be feasible but would not likely be testable using nuclear methods.
4. Onsite blending of blast rock and sand tailings may be performed by earthwork equipment (e.g., windrowing and spreading the rock and sand together in thin lifts). Specific procedures for onsite blending should be developed in conjunction with an NV5 representative during initial fill placement." *Centennial GeoTechnical Report*, document pp 13

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Document pp 16. *Centennial GeoTechnical Report*: "Engineered fill may be mixed on site using mobile equipment to ensure uniformity and meet specifications for compaction."

FUGITIVE DUST EMISSIONS UNDERGROUND

Grp 7-130 "The walls and roof of tunnels composed of rock containing significant asbestos will be covered with shotcrete and the floor with be covered with either concrete or 3 inches of non-Asbestos Containing Material. Shotcreting would be done as part of the tunneling cycle or after completion of tunneling. Floor covering would be done after completion of tunneling (*ASUR Plan, document pg 10 or pp 12 of 131*)."

How much cement does this add to mine operations and subsequent GHGs? Hexavalent chromium deposition? What level of asbestos is considered significant to warrant shotcrete?

Grp 7-131 DEIR pg 3-38 Lists a "Shotcrete Machine" that will "Spray concrete into the walls of the galleries to prevent rockfall." Is shotcrete to be used on all tunnels and not just significant asbestos areas?

"Water generated from drilling and dust suppression during tunneling in Asbestos Containing Material shall be collected in sumps or tanks and shall not be used for Surfacing." (*ASUR Plan, document pp 11 or pp 13 of 131*)

Grp 7-132 (*ASUR Plan, document pp 12 or pp 14 of 131*): "#6. Rock loads will be wetted for transit between the tunnelling and dumping area and equipment will be washed regularly to prevent dust from being tracked out into other areas of the mine."

How will this water be treated to remove asbestos? What will be the volume of asbestos contaminated water?

MERV 16 filters will remove 95% of fibers...that still leaves 5 % ... Rise claims that only 1% of material mined will be serpentinite.

Will MERV 16 filters be limited to serpentinite mining only? What type of filters will be utilized in main ventilation system? What is the quantity of asbestos in the 5% of what total mined quantity of serpentine/serpentinite?

Grp 7-133 The *Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust Nov 2021 pp 300* of 1938 states that the Serpentinite Content of Mine Fill will be 14.3% with an Asbestos content of serpentinite at 0.20%.

The final total is 0.03% (14.3% x 0.20% = 2.86% ÷ 100 = 0.03%) ???????

HOW CAN THE MINE FILL BE 14.3% SERPENTINITE IF ONLY 1% OF MINED MATERIAL IS SERPENTINITE?

ENFORCEMENT OF ROLLING INVENTORY ASBESTOS CONTENT

"If the three-month rolling Asbestos Inventory for materials hoisted to the surface exceeds 0.01% asbestos by mass of PCM equivalent units the geology department will immediately investigate the source of the asbestos containing material and halt mining in the area of concern until a revised mine plan is prepared in compliance with the ASUR Plan (*ASUR Plan, document pp 20 or pp 22 of 131*)."

Grp 7-134 Document page 9, ASUR Plan needs further interpretation/clarification:

"If planned mining is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass equivalent PCM units (1.07 TEM structures per nanogram)

i. Gold mineralization (intended for processing) will <u>not</u> be mined
ii. Barren rock from tunneling will either not be mined or mined using an auxiliary ventilation and dust collection system, as described in Section 6.1, designed to capture dust generated during the mining of these materials and prevent this dust from entering the main ventilation system and exhausting from the underground mine and a location for the underground disposal of this material will be specified and annotated on mine development plans."

SO, IF YOU ARE NOT GOING TO REMOVE THE GOLD MINERALIZATION, WHY WOULD YOU REMOVE THE BARREN ROCK SURROUNDING IT?

(*ASUR Plan, document pp 14 or pp 16 of 131*): "Records of all analytical testwork conducted will be retained for the life of the operation or a minimum of 7 years."

Grp 7-135 Once in the environment, asbestos does not degrade and will continuously be released into ambient air by wind or any soil disturbance.

Worker exposure occurs only during employment hours; however, community exposure occurs 24 hours per day. Workers choose to work in this environment with financial compensation. Workers are also provided training, respiratory protection, monitoring and health benefits while the community has none of these advantages.

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The life of the operation or 7 years of record retention is not an adequate retention period since disease caused by exposure may not manifest for 20 years-these are human lives at stake NOT TAXES!

DUE TO IMPLICATIONS FROM LONG TERM EXPOSURE TO ASBESTOS, RECORDS OF ALL ANALYTICAL TESTWORK MUST BE RETAINED INDEFINITELY.

(*ASUR Plan, document pp 19 or 21 of 131*): #10; If required by the NSAQMD, the plan must include an air monitoring component."

(*ASUR Plan, document pp 20 or pp 22 of 131*): "A geological report will be prepared annually with a summary of all materials mined. The report will include a summary of quantities of rock mined by lithology. The report will include analytical asbestos sampling data and all receipts issued for Engineered Fill. The report will include any dust sampling taken during operations. The report will include the results of any air monitoring or asbestos bulk sampling conducted at the request of NSAQMD."

Grp 7-136

A team of third-party licensed geologists should be monitoring and recording the above data every day to be utilized for reporting. The majority of this work is being performed underground...who will know the difference after the material is extracted, crushed and placed as engineered fill or hauled away?

BESIDES A REPORT, WHAT ACTIONS WILL BE TAKEN? ARE THERE ANY PENALTIES FOR EXCEEDENCES?

Is this plan legally enforceable? What if Rise obtains all the necessary permits to begin mining and decides to sell those permits to a third party or what if Rise sells the mine itself to a third party in the future...will the plan be required for the new operator?

Rise has stated that they will leave the infrastructure at the Brunswick site.

What assurances does the county have that the infrastructure will be clean and free from asbestos, heavy metals and silica contamination?

CONCLUSIONS:

The addition of the 3-month rolling inventory complicates downstream processes tremendously. It has the potential to affect air quality through increased fugitive dust emissions which increase the quantities of the TACs (asbestos, silica and heavy metals) being released directly impacting the Health Risk Assessment results. The health of the community is at stake.

Grp 7-137

Asbestos emissions are now being calculated on the assumption that rock material will contain 0.01% asbestos as described by the ASUR Plan. However, the ASUR Plan cannot control the actual asbestos content in the material being mined, the plan can only try to control the distribution of material being used for engineered fill to a 0.01% asbestos content. The actual asbestos content of rock being mined is unknown and highly variable.

CAN YOU ASSUME THAT ALL MATERIAL (BARREN ROCK AND ORE ROCK) WILL BE ONLY 0.01% ASBESTOS WHEN CALCULATING EMISSIONS?

CLASSIFICATION AND QUANTIFICATION IS NOT POSSIBLE UNTIL AFTER TESTING BY TEM OCCURS, AND THAT INFORMATION MAY NOT BE KNOWN UNTIL TWO WEEKS AFTER EXTRACTION AND TRANSPORT TO THE SURFACE.

"The average asbestos content of the total mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein." (*Air Quality and Greenhouse Gas Emissions Analysis Nov 2021, document pp 36*) Rise now estimates these emissions at 0.01%.

This is the same logic regarding acute vs long term exposure for the community. "Asbestos is classified as a known human carcinogen by the US state, federal, and international agencies, as well as by the World Health Organization" (Walker). There is no safe level of asbestos exposure (*WHO*).

ANY asbestos released to the ambient environment regardless of an immediate quantity released has the potential for long term implications because asbestos does not readily degrade once in the environment. "It is one of the most pervasive environmental hazards in the world. (Walker) "We know very little about the rates of weathering and leaching of asbestos in soil environments, but the available information suggests that substantial reductions in the amount of chrysotile may take hundreds or thousands of years, depending on the soil environment, and somewhat longer for amphibole asbestos." (*GUIDELINES FOR GEOLOGIC INVESTIGATIONS OF NATURALLY OCCURRING ASBESTOS IN CALIFORNIA, Special Publication 124, 2002 pp 24*)

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Thank you,

Pam Heard RRT

Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

HEALTH RISK ASSESSMENT CRITIQUE:

Community Health Risks from Exposure to Toxic Air Contaminants

Grp 7-138

"As explained in Section 2.1.2.2, Non-Criteria Air Pollutants, of the AQ-GHG Technical Report, a TAC is an air pollutant, identified in regulation by CARB, which may cause or contribute to an increase in deaths or serious illness, or which may pose a present or potential hazard to human health...Health effects to TACs may occur at extremely low levels and it is typically difficult to identify levels of exposure which do not produce adverse health effects. "(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B Memorandum, Subject: Idaho-Maryland Mine-Health Effects from Criteria Air Pollutants, pg 10, 2021*)

"A dispersion modeling analysis was conducted for DPM emitted from diesel vehicles and off-road equipment, blasting emissions, as well as for TACs from fugitive dust sources on the proposed project site for the HRA to assess the health risk impacts of the project's construction and operation on proximate off-site sensitive receptors." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 8, 2021*) "The cancer risk calculations were performed by multiplying the predicted dispersion modeled output data by the TAC emissions and the appropriate risk values...The noncancer health impact of an inhaled TAC is measured by the hazard quotient, which is the ratio of the ambient concentration of a TAC in units of µg/m3 divided by the reference exposure level (REL), also in units of µg/m3." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 4, 2021*)

"For evaluating health risk, the HRA was based on the assumption that exposure from construction and operational TAC emissions would generally occur up to 20 hours per day, 7 days per week for construction and up to 24 hours per day, 7 days per week, for 30 years for operation. This is consistent with OEHHA's guidance for performing operational HRAs.1" *(Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 1, 2021)*

The Idaho-Maryland Mine Project permit is for 80 years, almost three times the 30 years of exposure used in the health risk assessment.

WHAT WILL BE THE IMPACT ON HEALTH AFTER THOSE 30 YEARS OF EXPOSURE AND BEYOND?

1

This critique will examine input data points used in the AERMOD dispersion model whose output data then predicts the health risk impacts to the community from exposure to toxic air contaminants.

AERMOD MODEL

Regarding the selected dispersion model and its inputs is the statement -"Principal parameters of AERMOD for the project operations included the following:

- Dispersion Model
- Meteorological Data
- Urban and Rural Options
- Terrain Characteristics
- Sensitive Receptors
- Source Release Scenario
- Buildings" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pp 8-12, 2021*)

Several of these principal parameters require additional scrutiny with regards to the actual inputs used in the model and their applicability to the Grass Valley community in terms of future health risks.

Grp 7-139

Air pollutant dispersal is dependent on several factors: wind speed, wind direction, atmospheric stability and topography. (Transport and Dispersion of Air Pollution, Chapter 3, www.3epa.gov)

Atmospheric stability is dependent on the forces that relate to the vertical movement of air such as air density, air pressure, temperature and relative humidity. These forces dynamically interact on a constant basis to affect turbulence and the subsequent dispersal patterns of pollutants. It becomes critical to obtain the most accurate meteorological data available for input into these models which then estimate the health risks for cancer along with acute and long-term illness from exposures.

METEOROLOGICAL DATA

From the EPA Support Center for Regulatory Atmospheric Modeling (SCRAM) Air Modeling-Observational Meteorological Data: "Observed meteorological data for use in air quality modeling consist of physical parameters that are measured directly by instrumentation and include temperature, dew point, wind direction, wind speed, cloud cover, cloud layer(s), ceiling height, visibility, current weather, and precipitation amounts. These data are used in air quality models to capture the atmospheric conditions occurring at a source and/or receptor location, and therefore, play an important role as they effect the concentration of pollutants at receptors of interest." (www.epa.gov/scram/air-modeling-observational-meteorological-data, retrieved 1.27.2022)

The HRA states: "The nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away) and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction (Meteoblue 2020). The Blue Canyon met station has a predominant wind direction from the North-East and South; the Auburn met station from the East; and the Beale station from the South-East and North-West (CARB 2020)." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 12*)

"Blue Canyon was selected since it is the closest station and is the most representative of the project site. "(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk*

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Assessment, Appendix B, pg 12, 2021) There are multiple reasons why Blue Canyon is NOT representative of the project site in terms of meteorological conditions.

Blue Canyon is in the Sierra Nevada Mountains at an elevation of 4695 ft. This elevation creates a very different climate and weather patterns than what Grass Valley experiences in the foothills at an elevation of 2411 ft. Simply changing the terrain elevation data input does NOT correct for the differences in air density, air pressure, solar heating and dry/wet adiabetic lapse rates that result from the significant disparities between Grass Valley and Blue Canyon meteorological conditions.

The website, MeteoBlue states: "Climate Grass Valley 39.22°N 121.06°W The meteoblue climate diagrams are based on 30 years of hourly weather model simulations and available for every place on Earth. They give good indications of typical climate patterns and expected conditions (temperature, precipitation, sunshine and wind). The simulated weather data have a spatial resolution of approximately 30 km and may not reproduce all local weather effects, such as thunderstorms, local winds, or tornados."(Meteoblue. 2020. Climate Grass Valley. (Accessed September 2020. https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/grass-valley_united-states-of-america_5353775.)

NOTE: 30 km=18.641 miles The MeteoBlue site is not specific to Grass Valley with a spatial resolution of 30 km. A comparison of downloads in Meteoblue from both locations, Blue Canyon and Grass Valley, shows identical graphic measurements for ALL parameters:

- Average temperatures and precipitation
- Cloudy, sunny and precipitation days
- Maximum temperatures
- Precipitation amounts
- Wind speed
- Wind rose

Because of the 30 km resolution, Meteoblue makes zero distinction between Grass Valley and Blue Canyon weather patterns.

In the Air Quality Report, the consultant utilizes multiple quotes from various county documents, agencies and websites to substantiate his climate and weather claims. For the sake of argument, this critique uses data downloaded from WeatherSpark.com to compare Grass Valley to Blue Canyon meteorology. This website uses the same databases to compare the two locations.

The data for Grass Valley CA is based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016 (36 years total). The stations contributing to this reconstruction are: Nevada County Air Park (/y/149703/Average-Weather-at-Nevada-County-Air-Park-California-United-States-Year-Round) (67%, 5.0 kilometers, east); Auburn Municipal Airport (/y/145263/Average-Weather-at-Auburn-Municipal-Airport-California-United-States-Year-Round) (24%, 29 kilometers, south); and Beale Air Force Base (/y/145271/Average-Weather-at-Beale-Air-Force-Base-California-United-States-Year-Round) (9%, 33 kilometers, west).

The WeatherSpark data source for Blue Canyon illustrates the typical weather at Blue Canyon-Nyack Airport, based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016.

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OTHER DATABASE COMMONALITIES FOR WEATHERSPARK

All data relating to the Sun's position (e.g., sunrise and sunset) are computed using astronomical formulas from the book, Astronomical Algorithms 2nd Edition (https://www.amazon.com/Astronomical-Algorithms-Jean-Meeus/dp/0943396611), by Jean Meeus.

All other weather data, including cloud cover, precipitation, wind speed and direction, and solar flux, come from NASA's MERRA-2 Modern-Era Retrospective Analysis. This reanalysis combines a variety of wide-area measurements in a state of-the-art global meteorological model to reconstruct the hourly history of weather throughout the world on a 50-kilometer grid.

Land Use data comes from the Global Land Cover SHARE database, published by the Food and Agriculture Organization of the United Nations.

Elevation data comes from the Shuttle Radar Topography Mission (SRTM), published by NASA's Jet Propulsion Laboratory.

Names, locations, and time zones of places and some airports come from the GeoNames Geographical Database.

Time zones for airports and weather stations are provided by AskGeo.com.

Maps are © Esri, with data from National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, and iPC

THE NEVADA COUNTY AIR PARK REFERENCED AS THE WEATHERSPARK SOURCE IS 4000 FEET NE OF THE BRUNSWICK SITE AS THE CROW FLIES.

GRASS VALLEY

There is an average 10°F higher temperature differential every month of the year in Grass Valley. This conclusion has been verified on WeatherSpark and the Western Regional Climate Center databases. For example, the hot season lasts for 3.1 months in Grass Valley, from June 15 to September 18, with an average daily high temperature above 81° F. In Blue Canyon there is no hot season. The warm season there lasts for 2.9 months, from June 20 to September 18, with an average daily high temperature above 72°F. Average hourly temperatures also vary dramatically between the two locations.

Regarding precipitation: annually Grass Valley receives 53.2 inches rainfall vs 67.5 in Blue Canyon; and annually Grass Valley receives 8.4 inches snowfall vs 240.40 inches snowfall in Blue Canyon.

Wind directions also display wide variances between the two locations. This section discusses the wide-area hourly average wind vector (speed and direction) at 10 meters above the ground. The wind experienced at any given location is highly dependent on local topography and other factors, and instantaneous wind speed and direction vary more widely than hourly averages.

The average hourly wind speed in Grass Valley does not vary significantly over the course of the year, remaining within 0.5 miles per hour of 5.7 miles per hour throughout.

The predominant average hourly wind direction in Grass Valley varies throughout the year. The wind is most often from the south for 7.4 months, from February 10 to September 21, with a peak percentage of 55% on August 11. The wind is most often from the east for 4.6 months, from September 21 to February 10, with a peak percentage

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of 49% on January 1. (https://weatherspark.com/y/1178/Average-Weather-in-Grass-Valley-California-United-States-Year-Round)

BLUE CANYON

In Blue Canyon, the average hourly wind speed at Blue Canyon-Nyack Airport experiences *mild* seasonal variation over the course of the year.

The *windier* part of the year lasts for *4.3 months*, from *November 19* to *March 30*, with average wind speeds of more than *5.2 miles per hour*. The *windiest* month of the year at Blue Canyon-Nyack Airport is *December*, with an average hourly wind speed of *5.7 miles per hour*.

The *calmer* time of year lasts for *7.7 months*, from *March 30* to *November 19*. The *calmest* month of the year at Blue Canyon-Nyack Airport is *May*, with an average hourly wind speed of *4.8 miles per hour*.

The wind is most often from the **south** for **3.7 months**, from **January 31** to **May 21**; for **3.4 weeks**, from **August 18** to **September 11**; and for **1.1 months**, from **November 3** to **December 7**, with a peak percentage of **48%** on **March 2**. The wind is most often from the **west** for **2.9 months**, from **May 21** to **August 18**, with a peak percentage of **41%** on **July 18**. The wind is most often from the **east** for **1.7 months**, from **September 11** to **November 3** and for **1.8 months**, from **December 7** to **January 31**, with a peak percentage of **41%** on **October 20**. (weatherspark.com/y/145297/Average-Weather-at-Blue-Canyon-Nyack-Airport-California-United-States-Year-Round#)

The Brunswick Industrial site is located just southeast of Grass Valley. This means that the winds will transport all pollutants to the north and west toward the Brunswick Basin and downtown.

It is interesting to note that in Blue Canyon, the wind is blowing east during the hottest part of the year, May 21 to August 18. This input into AERMOD would not correlate with Grass Valley wind data under any circumstances.

These differences in weather variables must be taken into account during HRA modeling since the project will be located in Grass Valley not in Blue Canyon. Using Blue Canyon meteorological data is NOT representative of Grass Valley.

The meteorological input data, AERMET, is designed to accept data from any of the following sources: 1) standard hourly National Weather Service (NWS) data from the most representative site; 2) morning soundings of winds, temperature, and dew point from the nearest upper air station; and 3) on-site wind, temperature, turbulence, pressure and radiation measurements. AERMET can process commercially available or custom on-site meteorological data. (www.weblakes.com/guides/aermod/section8/8_1

SHOULDN'T METEOROLOGICAL DATA MORE REPRESENTATIVE OF GRASS VALLEY BE USED FOR THE HEALTH RISK ASSESSMENT?

Grp 7-140

WINDBORNE PARTICULATE MATTER

The following tables are based on Stoke's Law for Fluid Particle Forces and EPA Inhalable Dust definitions and calculations:

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Table 1: 10-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	0.55
6.2	1.1
12.4	2.3
24.8	4.6
37.3	6.9
49.7	9.2

Table 2: 5-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	2.2
6.2	4.5
12.4	9
24.8	18
37.3	27
49.7	36.1

(http://toxsci.oxfordjournals.org/content/65/1/7.full (including impacts/effects of airborne sulfur (SO2) and silica particulates/particles)

The average wind speed in Grass Valley is 5.7 mph. The Brunswick Site is located 2 miles from downtown Grass Valley. As evidenced above, the smaller the particle, the greater the distance travelled. Grass Valley currently monitors PM 2.5 at the Litton Building. Nevada County is currently classified as nonattainment status for PM10.

The International Agency for Research on Cancer of the World Health Organization has classified PM2.5 as a human carcinogen (*IARC: Outdoor Air Pollution a Leading Environmental Cause of Cancer Deaths; Technical Report; International Agency for Research on Cancer (IARC): Lyon, French,27 2013)*

On September 22, 2021 the World Health Organization revised air quality guidelines decreasing criteria air pollutants, especially the recommended exposure levels for PM10 and PM2.5. (https://www.iqair.com/us/blog/air-quality/2021-WHO-air-quality-guidelines

Has a baseline scenario for Grass Valley PM2.5 emissions or PM10 emissions been created since Nevada County is in nonattainment status for PM10? Were background PM2.5 concentrations from long range sources added to the HRA model?

A baseline concentration must be established in order to measure the TRUE impact from the addition of this project to existing air quality and the cumulative impacts on community health.

Grp 7-141

DPM, silica and asbestos fugitive dust will be emitted under two different categories: criteria air pollutants and as Toxic Air Contaminants. Yet in each situation, their health impacts to the community will be minimized.

As a criteria air pollutant, emission levels are not related to the immediate geographical area: "Notably, as detailed in Appendix C, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, such as the disconnect between mass emissions and concentrations due to secondary pollutant (such as O3) generation and pollutant transport, as well as the inaccuracy of applying regional and population-wide models to a local level in order to estimate health effects, and there are currently no modeling tools endorsed by an expert agency (i.e. NSAMQD) that could provide reliable and meaningful additional information regarding health effects from criteria air pollutant generated by individual projects." ***(Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project, pg 46, 2021)***

As a toxic air contaminant, asbestos and respirable crystalline silica will fall under the non-criteria air pollutant category. There are no established limits for monitoring emissions of non-criteria pollutants into the ambient

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environment. The HRA is based on 30 years of exposure, thus the cumulative effects of the 80-year permit are not addressed.

Grp 7-142

Grp 7-143

HOW WILL THE RELEASE OF THESE TOXIC MICROSCOPIC PARTICULATES TO THE AMBIENT ENVIROMENT BE MONITORED?

SENSITIVE RECEPTORS

Grp 7-144

When listing *Receptors Used for Evaluating Modeled Impacts* are the following statements: "There are existing residences in all directions of the project site, with the nearest located north of East Bennett Road at approximately 100 feet from the project boundary. The nearest hospitals and schools to the project sites are the Sierra Nevada Memorial Hospital on Glasson Way (approximately 1800 feet north of the Centennial Industrial Site) and the Montessori House of Children on The Burma Road (approximately 2,500 feet south of the Brunswick Industrial Site boundary). However, residential receptors are the most conservative to evaluate as discussed further in Section 4.3." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 7, 2021*)

What about the impacts to the following receptors?

The Durham School Bus Depot is located 1.74 Miles west of the Brunswick Industrial Site on Bennett Road. These buses transport our children throughout the county. Will we be delivering asbestos and silica dust along with the children?

Within a 2-mile arc north of the Brunswick Industrial Site are 5 Skilled Nursing Facilities (Golden Empire, Wolf Creek, Atria Memory Care, Spring Hill Manor, and Crystal Ridge), at least 6 Assisted Living Facilities, 10 low-income housing apartment complexes, Hospitality House and Brunswick Commons housing for the homeless. All supportive services are located here as well: Pride Industries, FREED, Alta Regional Center, DaVita Dialysis, Nevada County Public Health offices and Connecting Point. Chapa-De Indian Health and multiple physicians' offices serving Medi-Cal patients are located here too.

Grp 7-145

According to the 2020 US census, 28.6% of Nevada County is 65 years or older as compared to the statewide rate of 14.3% for that population. Under age 65, the disability rate is 14.4% and 32.4% of the population have Medicaid coverage. The mortality rate from Chronic Lung Disease is double the state wide rates (69.26 deaths/100,000 people vs 34.92/100,000). There are also elevated rates for Heart Disease Mortality, Hypertension Mortality, Stroke Mortality and All-Cause Cancer Mortality vs state wide rates.

The demographics of our community must be considered in the context of this project. We already have elevated baselines for high levels of the criteria air pollutants ozone and particulate matter, radon, aging population, chronic disease, and poverty.

WILL THE COUNTY'S EXISTING BASELINES BE TAKEN INTO ACCOUNT?

SOURCE RELEASE SCENARIO

Grp 7-146

Table 2. Emission Source Parameters

DIESEL FUEL

These parameters are used to input data into the AERMOD dispersion model. On Page 10 of the HRA, the generators are listed at a Base Elevation of 2,748.39 m. This calculates to a height of 9017 feet. The Brunswick

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Diesel Storage Tank is listed at a Base Elevation of 2,757.74 m which equals a height of 9048 feet and the Centennial Diesel Storage Tank is listed with a Base Elevation of 2,491.44 m which equals 8174 feet. These measurements are used to estimate carcinogenic volatile organic compound emissions from breathing and working losses from storage tanks which include benzene, hexane, toluene and 2,2,4-trimethylpentane. *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 23, 2021)*

All data entry inputs should be verified in AERMOD model due to these errors, especially units of measure, which may be affected for other source parameters (i.e. plume height/plume width of 25/25 meters for line sources).

Diesel fuel combustion from generator use will exhaust gases and DPM. These estimated emissions have been included for only 100 hours per year during testing/maintenance. Any emissions from actual use have been categorized as speculative. During a Public Safety Power Shutoff (PSPS), it is anticipated that 15,000 gallons of diesel fuel combustion per day will be required to maintain mining operations.

Grp 7-147

Will diesel fuel consumption be monitored? Will there be any provisions to mitigate the impacts from PSPS generator use contributing to increased criteria air pollutants, GHGs and DPM emissions affecting the community and environment?

Will there be any penalties if Tier 4 Final engines are not used exclusively due to "commercially available" status exemptions?

FUGITIVE DUST

SILICA

Silica will be released from on-road vehicles, underground blasting and crushing, ore processing along with earthwork and material handling.

All of the consultants have stated in their reports that they are using information provided by Rise to generate their conclusions. A prime example is the silica emissions. The following table shows the anticipated rock types and amounts expected to be mined:

Grp 7-148

Rock Type	Percent of Total
Meta-Andesite	96%
Altered Meta-Andesite	2%
Diabase	1%
Serpentinite	1%

This chart represents the anticipated barren rock ratios to be mined, approximately 500 tons per day. It does not account for the 1000 tons of mineralized ore rock to be mined each day. (*Groundwater Hydrology and Water Quality Analysis, EMKO, pg 93)*

"The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content."(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 35, 2021)*

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Regarding rock composition, this is meta-andesite rock not just andesite…it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9)*

The laboratory that Rise used for all metals analyses, ACZ Laboratories, is certified to perform both silica and silicon dioxide tests yet not a single sample was analyzed for this parameter. *(ACZ Analytical Capabilities 2017).*

The engineering firm, NV5, stated in the *Centennial Geotechnical Report* (pg 12) that: "We understand that the sand tailings will likely have a gradation similar to the historical gradation presented in the table below, and will typically have a large proportion of quartz."

Mesh Size	Particle Size (mm)	Particle Size (micron)	Percent Passing	Description
48	0.300	300	97.7	Medium Sand
65	0.212	212	87.5	Fine Sand
100	0.150	150	63.9	Fine Sand
200	0.075	75	32.3	Silt
325	0.044	44	12.1	Silt

Quartz is 100% silicon dioxide AND "1000 tons of ore" rock will be processed into tailings each and every day, *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix, B pg 21, 2021).*

These tailings will contain respirable crystalline silica, a toxic air contaminant. Rise has assumed that the ore rock is 98% andesite with a silica content of 60%. There is no data to substantiate this assumption. Minimizing the levels of this TAC to be generated from the excavation of material and milling of quartz greatly diminishes its' impact in the HRA considering the vast amounts, 1500 tons of barren and ore rock, to be mined each day.

HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF SILICA?

ASBESTOS

Asbestos will be released from on-road vehicles, during underground blasting and crushing, ore processing and along with earthwork and material handling.

Grp 7-149

The rock composition chart above lists total serpentinite mined at 1% yet the *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* assumes *Serpentinite Content of Mine Fill* at 14.3%. Based on the given information, daily mine fill content is composed of 500 tons of tailings and 500 tons of barren rock at 1% serpentinite.

With these ratios, how can engineered fill contain 14.3% serpentinite?

Grp 7-150

Rise has developed an Asbestos, Serpentinite and Ultramafic Rock management plan with the goal of minimizing asbestos release. A 90-day rolling inventory will be maintained in an effort to prevent asbestos contaminated material from being used as aggregate and engineered fill. A three-grab composite sample will be obtained for every 1000 tons mined. The sampling point is located mid drop in the silo. Inventory material will then be screened using Polarized Light Microscopy (PLM), followed by Transmission Electron Microscopy (TEM) testing with results to be mathematically converted to Phase Contrast Microscopy (PCM) equivalent units. These tests are not comparable since they utilize different preparatory methods, sample amounts and microscopy techniques. The detection limit for PLM testing is 0.25% and the detection limit for TEM testing is 0.001%. Conversion of TEM to PCM equivalent units yields a detection limit of 0.01%.

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Under this plan, Rise is using the PCM equivalent units limit of 0.01% to calculate emissions levels for fugitive dust. "A conservative approach for the modelling of TAC emissions is used, with the asbestos content in mined materials assumed at the maximum of 0.01% by mass of PCM equivalent units. The average asbestos content of the mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA)"(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 22, 2021*).

Initial asbestos sampling of 42 samples (*Asbestos Sampling Memo June 2020*) resulted in two samples at 0.075% and 2.5% by PLM analysis along with two samples at 2.0% and 3.1% by TEM analysis. The remaining 38 samples were non-detect (<0.25%) by PLM. Re-testing of these PLM samples by TEM yielded 6 samples with results greater than the PCM equivalent units detection limit of 0.01% in addition to the original 2 TEM samples that were not re-tested. Thus, **twenty percent** of the samples had asbestos levels greater than 0.01% PCM equivalent units.

Excluding the two grab tailings samples from Centennial and the two blanks, the average overall length of a sample core tested for asbestos was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available, no information available as to quantity, location, depth, etc. These cores appear to be in close proximity to each other as viewed on geological maps (*Asbestos Sampling Memo June 2020 pp 11-13*).

DEIR pg 3-20: "The ASUR plan incorporates routine asbestos testing by Transmission Electron Microscopy (TEM) and an Asbestos Inventory to ensure that average mined material and engineered fill contains less than 0.01% asbestos by mass of Phase Contrast Microscopy (PCM) equivalent units."

Just because Rise believes that they will be able to control the distribution of material to 0.01% asbestos content does NOT mean that they can control the amount of asbestos in the actual mined material. The content of asbestos in the serpentinite is unknown until tested-this requires blasting, excavation, crushing, skipping, conveyance to the surface, deposition and storage to then be followed by testing. Ventilation from the mine during these underground processes will emit asbestos to the ambient environment. This quantity of asbestos emissions is unknown and CANNOT be assumed to be only 0.01%.

Grp 7-151

The ASUR Plan dictates the use of water curtains and an auxiliary fan system when mining serpentinite material. According to Rise, this system uses MERV 16 filters that will trap particles to 0.03 microns reducing asbestos fibers by 95% before the fibers enter the main ventilation system. How much asbestos will be in the remaining 5% if the initial asbestos content of the rock is unknown along with the unknown quantities of rock mined?

Maintenance of the 0.01% inventory will not be attemptable until AFTER the material is mined, brought to the surface and tested twice- requiring up to two weeks before the results are known.

These asbestos emissions are not accounted for in fugitive dust estimations.

Grp 7-152

In 1986, asbestos was identified by the Board (CARB) as a toxic air contaminant: the Board also determined that there is not enough scientific evidence to identify an asbestos threshold level below which no significant adverse health effects are anticipated (17 CCR 93000). (*Implementation Guidance Document 2017, CARB pg 1*)

The World Health Organization (WHO) concurs that there is no safe level of asbestos exposure. Any asbestos released to the ambient environment will create chronic exposure risk for the community since asbestos does not readily degrade. Protecting mine workers from acute exposure when mining material "rich in asbestos" does not equate to the same level of community protection. Under these circumstances, miners will work a short-shift, wear respirators, be monitored for exposure, and decontaminate themselves before going home. They have the freedom of choice to work in that environment, financial compensation, training in exposure control and health care benefits. The community has none of these protections.

By using the detection level of 0.01% mass by PCM equivalent units to calculate emissions used in the HRA, the levels of this TAC have been grossly underestimated.

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HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF ASBESTOS?

HEAVY METALS

"Blasting and crushing would also result in emissions of dust with trace heavy metals TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren rock and mineralized rock was taken from Table 4-7 of the *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project* (EMKO Environmental, Inc. 2020)"

Heavy metals will be released: from off-road equipment, on-road vehicles, during underground blasting and crushing, ore processing along with earthwork and material handling-all phases of operations.

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis EMKO, pp 515-516*) and (Appendices: *Groundwater, Hydrology and Water Quality Analysis Report: Inorganic Extended Qualifier Reports pp. 389-407 and 458-484)*

Grp 7-153

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. It is not clear where the samples were located between the assay lab, ALS Laboratories in Reno, Nevada and submission to ACZ Laboratories in Steamboat Springs, Colorado. The Chain of Custodies describe these 47 samples as Tailings (assay pulp). All list a sample date of 3/5/19:12:00 pm. Under the Sampler's Name were the initials, BM (Ben Mosssman?) Ben Mossman and Andrew Kopania of EMKO both received copies of the laboratory reports as listed on the CoCs. The laboratory received by date for all samples is 11.11.2019. Twenty samples were digested on 11.22.2019 and the remaining twenty-seven samples were digested on 11.26.2019. (The digestion dates would be used for endpoint hold time calculations).

These samples may have been collected at that time but they were NOT sampled at that time. These metals analyses were performed in November 2019 in two batches. This means that all samples were tested at least 9 months beyond their hold time expiration date, probably more.

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases." (https://doi.org/10.1016/j.chemgeo.2020.119896Get rights and content)

SHOULDN'T VALID DATA BE USED WHEN EVAUATING THE HEALTH RISKS TO THE COMMUNITY FROM THESE TOXIC AIR CONTAMINANTS, ESPECAILLY WHEN THESE METALS HAVE THE ABILITY TO POTENTIATE THE EFFECTS OF ASBESTOS?

CONCLUSION

Grp 7-154

"Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for the purposes of this HRA." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 22)*

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Estimations of estimates...estimates of estimations

IS THERE ANY VALIDITY IN ANY OF THESE ASSUMPTIONS, ESTIMATIONS OR DATA REGARDING THE EMISSIONS OF SILICA, ASBESTOS, HEAVY METALS OR DPM?

IS THERE ANY VALIDITY TO THIS HEALTH RISK ASSESSMENT OF OUR COMMUNITY?

Thank you,

Pam Heard RRT

Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
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Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

SAMPLING PROCEDURES

Grp 7-155

Page 93 of the *Groundwater Hydrology and Water Quality Analysis Report*, EMKO states that Rise completed 19 drill core holes, totaling 67,500 linear feet, from 2017-2019. The sampling pattern was to drill 90 feet, pull a 10-foot sample segment, drill another 90 feet, etc. The drill logs are not available for review; the actual dates, precise locations, drift angles, widths, final depths, etc. are unknown.

"The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93) Samples were received on 02.20.2019 with a finalized date of 03.05.2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis Report pp 515-516*)

After assay for gold, the samples were subjected to additional testing at different laboratories.

Grp 7-156

METALS ANALYSES, DI-WET, ABA, WET CHEMISTRY PARAMETERS

FLOTATION COMPOSITE- McClelland Labs

"A composite sample was prepared from 76 samples of the ~2 mm material remaining from assaying. A portion of the material was weighted to represent the interval length and merged to make the metallurgical sample. Sufficient material was available for most samples, except for five samples where no material was available from the assay lab. The 76 samples created a composite metallurgical sample of approximately 46 kilograms (kg) (100 pounds)". (*Groundwater Hydrology and Water Quality Analysis Report pp 95-96*). This composite was sent to McClelland Labs in July 2019 which then homogenized the sample and split it into 4 sub-samples, F1-F4 flotation tailings samples. Page 537 of *Appendices: Groundwater Hydrology and Water Quality Analysis Report* states: "A total of 7 buckets containing 6 separate samples were received from the Maryland mine on July 10, 2019. The

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samples weighed 4 to 47 kg, and appeared to be approximately -6 mm in size. The largest sample ("flotation composite") was intended for analysis..."

Is the material 2 mm or 6 mm in size? What is the exact provenance of the 76 samples that comprise the composite as it relates to the 47 cores submitted for assay?

After flotation testing, these samples were shipped from McClelland Labs to a geologist at Benchmark Resources in Folsom, CA during November 2019 who then submitted the samples to ACZ Laboratories in Steamboat CO. These samples, F1-F4, were then analyzed by ACZ for total metals, DI-Wet metals, Static Acid-Based Accounting and wet chemistry parameters.

BARREN ROCK-ACZ Laboratories

Grp 7-157

On October 29, 2019 a geologist with Benchmark Resources selected barren rock samples: MA-1, MS-1, MA-2, MAA-1, S-1 and MA-3 from Rise Grass Valley. These samples were from 3 different cores [1 sample from I-18-10, 1 sample from I-18-11 and 4 samples from I-19-13 (*Groundwater Hydrology and Water Quality Analysis Report, EMKO pg 93)*], with combined segments equaling 34.1 linear feet. This represents only 0.05% of 67,500 total linear feet.

They were submitted to ACZ Laboratories in November 2019 to be tested for total metals, DI-WET metals, Static ABA and wet chemistry parameters.

METALS ANALYSES-BARREN ROCK CRUSHED CORES-ACZ Laboratories

Samples submitted for metals testing with identifiers can be found in Table 4-9 Barren Rock Crushed Core Samples: Total Metals Results in *Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102*.

Grp 7-158

Regarding the barren rock crushed core metals analyses, only 5 cores were tested which means that only 26% of the 19 total cores were sampled [1 sample from B-18-02, 3 samples from I-18-10, 1 sample from I-18-11, 2 samples from I-18-12 and 40 samples from I-19-13 (*Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102*)]. All five core segments combined length equal a total of 456.5 linear ft. These combined 10 ft segments represent only 0.68% submitted for testing compared to total of 67,500 ft. In general, each sample represents 10 linear feet. The diameter of the cores is not given. It is not stated how much material, weight wise or volume, is contained in each segment or specifically how that material is "homogenized" to obtain a representative sample for testing.

After assay at ALS Laboratories, the samples were labelled as "Pulp-2, Tailings= (assay pulp)". These 47 samples were then analyzed by ACZ Laboratories for total metals. The final weight used in metals analysis is 1-2 grams of material per sample.

Grp 7-159

The reference for this "Crush and Pulverize" step is EPA 600/2-78-054 3.1.3 (Field and Laboratory Methods Applicable to Overburdens and Minesoils, March 1978 pp. 43-45). The Foreword states "This report provides chemical, physical, mineralogical, and microbiological procedures for the analysis of coal overburdens and the resultant minesoils. These step-by-step methods identify and measure rock and soil properties that influence advance planning, mining efficiency, post-mining land and water quality and long-range land use."

2

Procedure (3.1.3):

1. Pour field sample onto a large square of brown paper. Spread material evenly and allow to air dry. NOTE: Sample may have to be mixed periodically to speed drying.
2. After drying, the field sample is split into two representative subsamples. One subsample is placed in a container, labeled, and stored for physical analyses or individual preference tests.
3. The other subsample is placed between two sheets of brown paper and crushed by moderately rolling over the top sheet with a rolling pin. This process is continued until the entire field sample has been processed. NOTE: Do not allow paper fragments to become incorporated with the soil sample. Do not crush rock fragments.
4. Pass the crushed material through a sieve with 19 mm openings and discard material retained on the sieve.
5. All material passing the 19 mm sieve is crushed to pass through a sieve with 6.35 mm openings.
6. Place sieved sample in a 1 liter container and cover. NOTE: Container should not be more than two-thirds full or mixing (step 7) will be impaired.
7. Tumble container end-over-end until material is thoroughly mixed.
8. Place three heaping teaspoons of the mixed material in the pulverizer. Material is pulverized until it passes a 0.25 mm (60 mesh) sieve. NOTE: A cast iron mortar and pestle can be substituted for the pulverizer.
9. Place pulverized material in a plastic vial for laboratory use.
10. Label vial with the sample identification shown on the field container.
11. Mix sample thoroughly by tumbling the vial end-over-end before subsampling for laboratory procedures (primarily chemical analyses).

After a sample is obtained, according to test method, M3050B (SW-846) Acid Digestion of Sediments, Sludges and Soils, a 1 gram (dry weight) of sample is digested for ICP-MS metals analyses testing. The digestate is then diluted to a final 100 ml volume. Flow injection volumes generally range from 20µl-200µl (microlilter) from the 100 ml prepared volume. A µl (microliter) is equal to 0.001 milliliter(ml) or 1/1000th of ml. Analyses dilution factors range from 1 to 500. For reference: There are 1 million grams in a metric tonne.

All metals were digested using EPA Method 3050B. The results should be defined as the "Total acid soluble/recoverable metals" fraction since this method does not use hydrofluoric acid, thus it is unable to break down silicates. (EPA SW-846 Revision VI December 2018, Chapter 3, pg 4)

ACZ Laboratories did receive "pulp" samples, residual material after ALS gold assay analyses. "In addition to the barren rock samples, Rise provided 48 crushed core samples, taken from ~2 mm assay rejects, for trace element test work." (*Groundwater Hydrology and Water Quality Analysis Report, EMKO, pg 95*) The actual number of samples was 47.

The barren rock samples must be pulverized prior to acid digestion just as the 47 "pulp" samples were pulverized prior to analysis for metal analyses. Any conclusions comparing metals content, leachate capacity, ABA, etc. between pulp results and barren rock results is moot since the sample preparation (pulverization) is identical.

Grp 7-160

TESTING TIMELINES

3

After exploratory drilling, cores were sent to ALS Laboratories which were received on 02.20.2019. Date finalized 03.05.2019. "The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93)

Then the composite sample was prepared and sent to McClelland Labs for flotation testing from July 2019- November 2019. Samples F1-F4 were then sent to ACZ Laboratories for metals testing, DI Wet testing, ABA and wet chemistry parameters. The Flotation Results Report from McClelland Labs was not submitted to Rise until January 29, 2020.

Also in November, 2019, the 47 crushed core samples were sent to ACZ for metals testing along with the six barren rock samples to be tested for metals, DI WET metals, ABA and wet chemistry parameters.

It is difficult to understand how the composite sample was prepared and analyzed months before the individual samples (barren rock and barren rock crushed core) were submitted to ACZ in November 2019. The chains of custodies do not reflect the written account. Other than the out-going COC from McClelland to Benchmark Resources regarding F1-F4 samples, all sample shipments originate from Rise Grass Valley. The transitions between the various laboratories are not documented regarding dates, amounts, sample containers, etc.

SAMPLE POPULATIONS

FLOTATION COMPOSITE

"A total of seven buckets containing six separate samples were received from the Maryland Mine on July 10th, 2019. The samples weighed 4 to 47 kg, and appeared to be approximately 6 mm in size. The largest (flotation composite") was intended for analysis and metallurgical testing as well as environmental characterization of the testing products... The five remaining samples were indicated to be waste rock samples of various types for environmental characterization. Preparation and analysis of the waste rock samples will be discussed in a separate report." (*Appendices*: *Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 2)*

Grp 7-161

"The rougher tailings from two selected tests were also subjected to environmental characterization (discussed in a separate report)." (*Appendices*: *Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 4)*

The flotation composite arriving in a bucket is not a very specific provenance considering that these tailings will be used to determine heavy metal leachates. What material was in this bucket?

What is environmental characterization of the testing products? What is the environmental characterization of the waste rocks? Where is the separate report that describes the preparation and analysis of the waste rock and rougher tailings for "environmental characterization"? Is the environmental characterization part of the Cement Paste Backfill study?

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BARREN ROCK SAMPLES

The three cores represent a 15.8% sample population when compared to 19 total cores. Samples MA-1(I-19-13), MS-1(I-19-13), MA-2 (I-19-13), MAA-1(I-19-13), S-1(I-18-11) and MA-3 (I-18-10) were each tested for barren rock total metals, barren rock leachate DI-WET, barren rock Static Acid-Based Accounting, and Wet Chemistry parameters. In addition, samples MA-1, MS-1 and MA-1 were assayed for gold determination.

BARREN ROCK CRUSHED CORE SAMPLES

Grp 7-162 Metals analyses for forty out of forty-seven representing 85% of the total rock core samples were from a single drill core, I-19-13, at various depths (167 ft bgs to 4774.6 ft bgs = 4607.6 total feet). These samples represent 6.8% sample population when compared to 67500 total linear feet. In addition, 25% of this core is missing between depths 3227.0-3583.0 = 356 ft, 3969.7-4313 = 343.3 ft and 4323.0-4767.9 = 444.9 ft. These missing sections total 1144.2 ft out of 4607.6 feet. The remaining 3463.4 feet represent a 5.1% sample population compared to the 67500 total linear feet.

CONCLUSION

Grp 7-163 It is obvious that very limited sampling and testing has been done. Only one sample, B-18-02, was analyzed from the "Brunswick" area- metals analyses were performed on the barren rock crushed core sample. Rise plans to mine in this area immediately along with the installation of major infrastructure.

Grp 7-164 There are egregious issues with the Chains of Custody regarding sample dates, locations and quantities. Samples from only 5 cores are represented out of 19 total cores. Eight five percent of total metals analyses (barren rock crushed cores) were performed on one core, I-19-13, while 67 % of barren rock total metals, leachate Di-WET testing, wet chemistry along with ABA testing were performed on this same core.

Grp 7-165 There are inconsistencies and omissions within this limited sampling as well. For example, S-1 is taken from core I-18-11 at a depth of 4725.6'-4725.7'. This is a total of 0.1 feet or 1.2 inches. The diabase sample above it (Y973586) is taken at 4107.8-4117.55'. What is between these two samples with 608.05 feet missing? Where did the serpentinite layer begin? How deep is the serpentinite layer beneath since sampling stopped after 1.2 inches?

Grp 7-166 Sample (Y973596) from core I-19-13 at 4767.9'-4772.7' is listed as MA in the Hydrology report but as Meta volcanic serpentinite on ALS COC. Sample (Y973597) from core I-19-13 taken from 4772.7'-4774.6' is serpentinite also. What is below this level where sampling stopped after 1.9 feet? This is known serpentinite containing asbestos.

QUALITY CONTROL ISSUES

Grp 7-167 Regarding static acid-base-accounting, page 510 of the *Appendices: Groundwater Hydrology and Water Quality* states that the following parameters are not offered for certification or are not covered by NELAC certificate #ACZ:

Neutralization Potential as CaCO3	M600/2-78-054 NV Modified Sobek Procedure
pH, Saturated Paste	EPA 600/2-78-054 section 3.2.2
Sulfur HCl Extractable	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek Procedure

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Sulfur HNO3 Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Hot H2o Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Residual Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Total Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek

Lack of certification impacts validity of acid-base-accounting results for all samples: MA-1, MA-2, MA-3, MAA-1, MS-1, S-1, F-1, F-2, F-3 and F-4 (pp 495-504, Appendices: *Groundwater Hydrology and Water Quality Analysis Report*).

SILICA

Toxic air contaminants, silica and asbestos, will be produced daily in massive quantities. Silica content is assumed as 60% quoting a textbook definition of andesite rock composition. But 98% of the total rock mined is assumed to be meta-andesite. Regarding rock composition, meta-andesite rock is not just andesite....it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9)*

Grp 7-168

500 tons of barren rock will be mined each day.

Mineralized ore rock, gold in quartz (100% silicon dioxide) veins, has not been accounted for in silica calculations.

1000 tons of ore rock will be mined each day.

Silica content was not tested on any samples even though the methods utilized, ICP-MS, can analyze for both Silicon (Si) and Silica (SiO_2) and more specifically can be performed by their contracted laboratory-ACZ Laboratories (*ACZ Analytical Capabilities 2017*).

What is the actual silica content of the barren rock and ore rock?

ASBESTOS

Grp 7-169

Forty-two samples were analyzed for asbestos: two blanks, 2 Centennial tailings and 38 drill core samples. The core samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. The average overall length of the sample cores tested was 5.34 inches. Drilling was stopped when asbestos was detected. Drill logs are not available, therefore unable to determine depth or width of serpentinite deposit encountered. Asbestos sampling was limited. Centennial tailings were only identified by grid number-no information as to quantity, location, depth, etc.

Rise states that 1% of material mined each day will be serpentinite (*Groundwater Hydrology and Water Quality Analysis Report*, pg 93). Yet all of the geological maps located in the *Technical Report for the Idaho-Maryland Mine Project* show the quartz veins running with the

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contact points of the faults along the serpentinite deposit (AMEC 2017 pp 7-17, 7-23, 9-9, 9-11, 9-26).

The *Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* Nov 2021 pg 300 states that the serpentinite concentration of Mine Fill will be 14.3%. How can the mine fill concentration be seven parts serpentinite when it comprises only 1 % of material mined?

"Exploration drilling was designed to test a variety of mineralization throughout the deposit in areas where mining is expected to occur." (pg 93, Hydrology Report) "Rise selected mineralized samples for metallurgical testwork by reviewing drill logs and maps. Samples were selected to represented (sic) materials representative of future mining. Factors considered in selection were gold grades, minimum mining widths, mineralization style, and locations throughout the potential mining areas." (pg. 95 Hydrology Report)

CONCLUSIONS

Grp 7-170 How can the actual ratios of rock mined be known based on this work? This information is necessary to determine emissions of toxic air contaminants such as heavy metals, silica and asbestos.

Grp 7-171 Why wasn't more testing done on the Brunswick area since mining is anticipated to begin there immediately along with the installation of major infrastructure?

Grp 7-172 How can the data from this limited sampling be extrapolated to 2585 acres being mined to unknown depths for the next 80 years?

Thank you,

Pam Heard RRT

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"Technical Support for Grassroots Public Interest Groups"

March 16, 2022

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Re: Comments on the Draft EIR for the Idaho-Maryland Mine Project

From: David M. Chambers, Ph.D., P. Geop.

Background

David Chambers has 40 years of experience in mineral exploration and development – 15 years of technical and management experience in the mineral exploration industry, and for the past 30+ years he has served as an advisor on the environmental effects of mining projects both nationally and internationally. He has Professional Engineering Degree in physics from the Colorado School of Mines, a Master of Science Degree in geophysics from the University of California at Berkeley, and is a registered professional geophysicist in California (# GP 972). Dr. Chambers received his Ph.D. in environmental planning from Berkeley. His recent research focuses on tailings dam failures, and the intersection of science and technology with public policy and natural resource management.

Grp 7-173

OVERALL COMMENT

This is a rather unusual mine project proposal, a request for an 80-year operating permit, in that most regulatory agencies would consider the level of information presented for this environmental review of the project sufficient only to consider this as a proposal for advanced exploration, not for mine development. This mine development proposal lacks the economic and environmental data necessary to evaluate a full mine development proposal.

Grp 7-174

Unlike a typical mine that is being proposed for production, the Idaho-Maryland mine; (1) does not have an identified mineral reserve, or even a mineral resource; (2) the drilling core is not sufficient to provide the necessary information on the geochemistry of the waste rock and tailings; and, (3) there is no surface water-quality modeling. These are all elements that are critical in evaluating the potential impacts of a proposed mine.

As a result, it is not known whether the mine waste could leach contaminants into ground and/or surface waters. The design details of the "engineered fill" facility have yet to be done, so it not known if the proposed design is geotechnically sound. In addition, the long-term closure costs for the mine have not been analyzed.

Page #2

SECTION-SPECIFIC COMMENTS

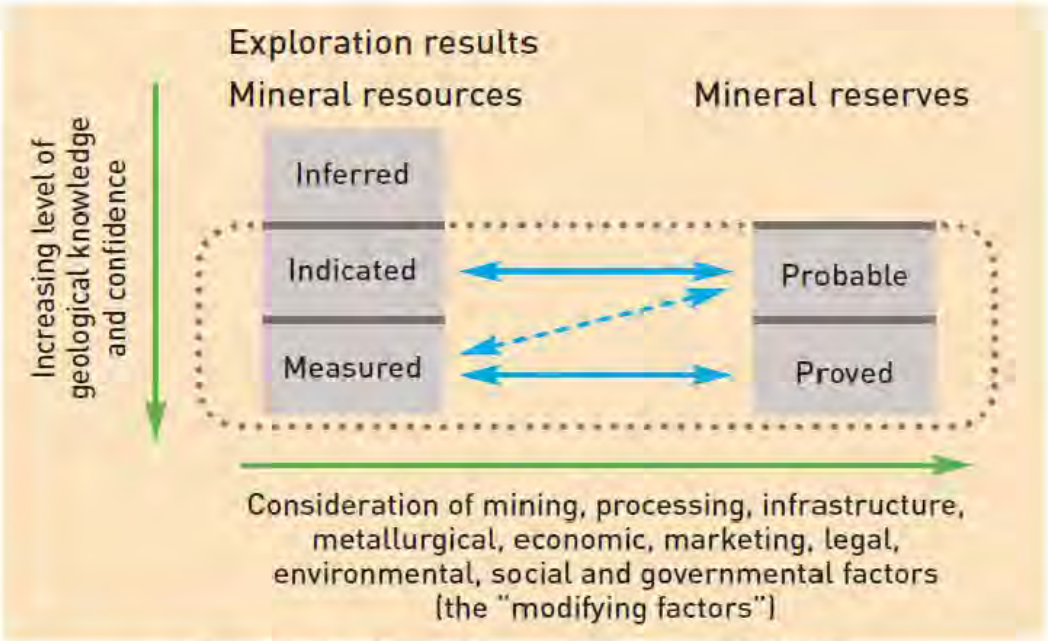
3.6 Project Objectives

In order to have a credible mine proposal, a minimum amount of ore must be identified to warrant the economic investment to open a mine. It is possible that a mining company has enough capital to self-fund the hundreds of millions of dollars necessary to bring a mine property like Idaho-Maryland to the point where it is ready to produce its first ounce of gold, but this is seldom the case. And even if this were the case, a responsible board of directors would require a thorough economic analysis before committing this level of funding for a project.

A mineral property with no current mineral resources or mineral reserves has been described by the Canadian National Instrument 43-101 policy as an "early stage exploration property" (OCS 2011). This is the case with the Idaho-Maryland property's latest 43-101 compliant technical report (Rise Gold 2017).

A mineral resource is a concentration or occurrence of solid material of economic interest. A mineral reserve is the economically mineable part of a measured and/or indicated mineral resource (ICMM 2013). The figure below has presented in approximately this same format for quite some time as a way to illustrate how the concepts of mineral resource and mineral reserve are related – technically, economically, and legally.

Grp 7-175



Classification of Mineral Resources & Reserves (ICMM 2013)

Grp 7-176

Rise Gold does not have enough drill samples to satisfy the requirements to meet any of the mineral resource or reserve definitions described in the Classification of Mineral Resources & Reserves. This same lack of an adequate number of drill samples also results in the lack of data required to adequately characterize the geochemistry of the waste rock and tailings that will be produced, or to supply test data on the leachate from this waste that would allow modeling of potential impacts to surface water.

Page #3

Geochemistry of the waste rock

The projected waste rock geochemistry analysis is summarized in the EIR Appendix K.2: Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project Nevada County, California, EMKO Environmental, February 2021.

In Table 4-5 (below) from Appendix K.2, it is predicted that the 96% of the waste rock will produced will be Meta-Andesite.

Table 4-5 Estimated Daily Barren Rock Production

Material Type	Tons per Day	Percent of Material Produced
Meta-Andesite	481	96
Altered Meta-Andesite	12	2
Diabase	5	1
Serpentinite	2	1
TOTAL	**500**	**100**

Rise completed 19 drill exploration drill core holes, totaling 67,500 linear feet, from 2017-2019. From this drill core, Benchmark Resources collected six drill core samples that it used to characterize the geochemistry of the waste rock. These samples are listed in Table 4-6.

Meta Andesite, which constitutes 96% of the waste rock to be mined, was taken from three intervals of drill core – samples MA-1, MA-2, and MA-3. Sample MA-1 was from the near surface rock 167' - 177' below the drill level, so it not representative of most of the Meta Andesite that will be produced from mining, which will occur at much greater depth. As a result, the geochemical predictions for approximately 96% of the waste rock to be produced comes from one 10-foot interval of drill core (Sample MA-2 from 3959.7 ' to 3969.7'), and one 1-foot sample (MA-3 from 3265' to 3266').

Table 4-6 Core Samples Collected by Benchmark Resources

Sample Name	Description	Date	Time	Bag #	Hole #	Elevation Interval
MA-1	Meta Andesite/Porphyrite	29/10/2019	10:45 AM	Y973551	I-19-13	167'-177'
MS-1	Meta Sediment/Porphyrite	29/10/2019	11:00 AM	Y973560	I-19-13	1,067'-1,077'
MA-2	Meta Andesite/Porphyrite	29/10/2019	11:05 AM	Y973594	I-19-13	3,959.7-3,969.7
MAA-1	Meta Andesite Altered/Porphyrite	29/10/2019	11:20 AM	core box	I-19-13	3,357'-3,360'
S-1	Serpentinite	29/10/2019	11:25 AM	core box	I-18-11	4,725.6'-4,725.7'
MA-3	Meta Andesite Altered/Porphyrite	29/10/2019	11:45 AM	core box	I-18-10	3,265'-3,266'

Another way to describe this is that the geochemical characterization of the 2 million tons of waste rock produced during the first 11-years of mining, and nominally the waste rock production from the entire 80-life of the proposed permit, is represented by these two samples, which come from a total of 11 feet of drill core.

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Australian Guidance on Sample Numbers (adapted from Australian Government Department of Industry, Tourism and Resources, 2007 (GARD Guide Table 4-5)

Mine Phase	Number of Samples	Description
Exploration	(1) Prospect Testing – Include sulphur in list of elements being analyzed for all samples tested; include the full range of pathfinder elements as defined by ore deposit/exploration model; collect and record mineralogical data as per exploration/ore deposit model; where the geology of the deposit is known include static testing of at least 3 to 5 representative samples of each key material type (i.e., lithology, alteration type); analysis of ground water and surface water for acidity and representative pathfinder elements. (2) Resource Definition – All samples tested for sulphur and representative samples tested for mineralogy as per ore deposit model. **Static testing of at least 5 to 10 representative samples of each key material type. *(emphasis added)*** Collect groundwater and surface water data. Surface water and groundwater analysis to include acidity as well representative metal ions. All testing to include QA/QC samples.	By the end of the resource definition phase, there should be adequate information to accurately characterize the ARD potential of the ore body (high and low grade), although further test work will normally be required to characterize the ARD potential of waste rock and ore and hence tailings.
Pre-Feasibility	**Static testing of several hundred representative samples of high and low grade ore, waste rock and tailings**, the number dependent on the complexity of the deposit geology and its host rocks. ***(emphasis added)*** All drillhole samples analyzed must include sulphur analysis and identified representative metal ions. Sampling density is dependent on complexity of ore deposit and host rock geology interval of representative drill holes but should be restricted to single rock units or lithologies - include minimums. **Kinetic testing of at least 1 to 2 representative samples of each material type. *(emphasis added)*** Surface water and groundwater analysis to include acidity as well as pH, EC and representative metal ions, including Al, Fe, Mn. All testing to include QA/QC samples.	Where required, the number of samples must be sufficient to populate a "resource" block model of the ore and host rocks that will be affected by mining with a reliable distribution of NAPP[1] data (e.g., acid producing potential (APP), sulphur and acid neutralizing capacity (ANC) (or NPR data) on ore, waste rock and wall rock.
Mine Planning, Feasibility and Design	Where required, additional static testing as required for block waste resource model refinement – **increase density of NAPP (or NPR) characterization. *(emphasis added)*** Inclusion of confirmatory testing (e.g., NAG testing for comparison to NAPP (i.e. APP, or sulphur, and ANC) for metalliferous deposits; and mineralogy or NPR values). Continuation of kinetic testing. Upgrade drillhole database and waste resource model for new ore positions. All testing to include QA/QC sample(s). Apply QA/QC to all analyses, not only ore. Include wall rock.	Data set must be sufficient to assess ARD potential to support a management plan. If data are insufficient, additional testing will be required.

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The widely accepted source of guidance for determining the number of samples for acid-drainage/metals-leaching prediction is the Global Acid Rock Drainage Guide (GARD 2018), published by the International Network for Acid Prevention. The GARD Guide has adopted the Australian Guidance on Sample Numbers for determining the number of samples needed to determine acid-drainage/metals-leaching potential (GARD Guide Table 4-5).

The number of samples used to predict the leaching potential of the tailings and waste rock for the proposed Idaho-Maryland Project does not meet even the lowest level of these criteria. The number of samples analyzed for this proposal would not even meet the requirements for the Exploration stage of sampling, let alone the Mine Planning, Feasibility and Design phase, which is the level of development being proposed for the Idaho-Maryland Project.

3.7 Project Components– Water Treatment

Grp 7-177

There is no discussion, or disclosure, of the operational water quality treatment needs or processes. The EIR merely requires that the applicant apply to the Regional water Quality Control Board for a discharge permit. The water quality discharge that will be required by the discharge permit should be disclosed in the EIR so that the public is able to assess and comment on the potential impacts. To simply assert that water quality standards will be met is not sufficient for reviewers to assess either the adequacy of the water treatment methods proposed, or the adequacy of the standards proposed for the discharge permit.

This completely circumvents any discussion or analysis of what the contaminants of potential concern might be, what contaminants would be monitored, what treatment methods are available, and where monitoring would take place. This information should all be disclosed in the EIR.

Grp 7-178

In addition, a Monitoring Plan should be included. The Monitoring Plan should incorporate all elements of monitoring, including surface water, ground water, air, and noise sampling. Sampling locations, frequencies, and constituents should be disclosed/discussed in the Monitoring Plan, and summarized in the EIR.

3.7 Project Components – Backfill

Grp 7-179

It is noted that approximately 500 tons/day of tailings will be backfilled into the mine as cemented paste. The technical details of the process are contained in "Desktop Study of Cemented Paste Backfill, ITASCA Denver, Inc. February 24, 2020." In this report it is noted that no tests on the leaching characteristics of tailings have been performed, but that testing would be done when a cement had been selected. Even though the backfill is unlikely to turn acidic, the potential for neutral leaching of contaminants like arsenic need to be investigated.

The answers to several critical questions that should be addressed in Chapter 3 of the EIR are: (1) the grind size of the tailings used for backfill; (2) the type and amount of cement to be used; and, (3) the results of leach tests on the backfill.

This information should have been available for the EIR, and is another data gap in the EIR.

3.7 Project Components – Engineered Fill Transport

Even though this is nominally the section about the transport of the waste material, most of the technical information on the Engineered Fill is presented here.

Grp 7-180

The mine waste that is not backfilled into the mine will consist of 50% tailings (rougher tailings from flotation separation in the mill), and 50% waste rock from the mine. Approximately 4 million tons of waste would be placed at two sites near the mine during the first 11-years of mining. The number of samples utilized in the leach tests of this waste is not sufficient to properly characterize the contaminants

Page #6

that may be leached from the waste. Comparing the number of samples cited in the EIR to the sampling guidelines of the GARD Guide demonstrate the insufficiency of the existing tests.

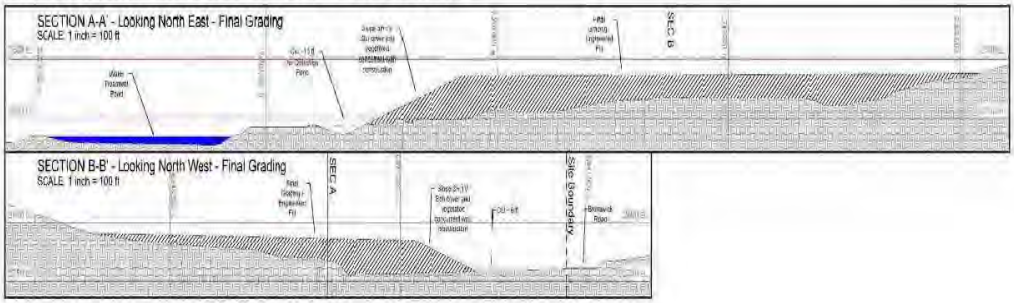
In addition to testing for the contaminants that may come from the waste, as the term "engineered fill" implies, this will be an engineered mine waste facility. The EIR, and its supporting documents, imply that the required engineering analysis will be done at some future time, but provide virtually no engineering analysis or design specifications for these waste facilities as a part of the EIR.

It is stated in the EIR that, "*Engineered fill would continue to be placed, graded, and compacted in a series of lifts …*" The only drawings of the cross sections of the waste facilities in the EIR are from Rise Grass Valley, not an engineering company, and seems to show the mine waste being deposited as end-dump layers that cannot be compacted to generate further stability, not horizontally-deposited layers that could be compacted.

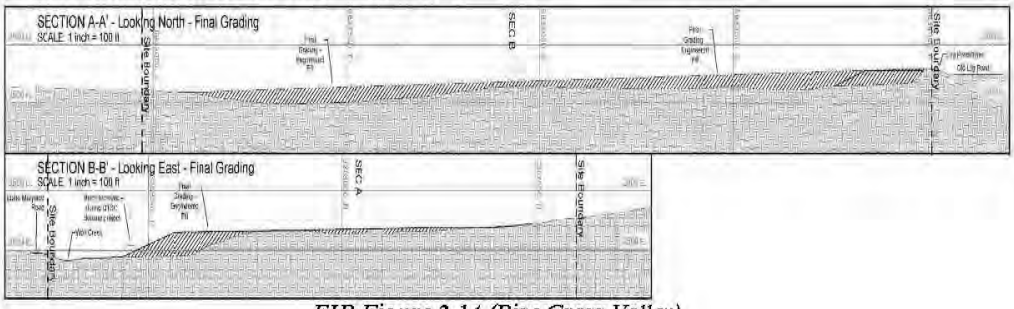
The new mine waste will be placed on top of portions of existing mine waste, which could provide a plane of weakness that could provide an additional failure plane for the significant weight of rock that will placed on top of it. The Brunswick facility is projected to be up to 90 feet in height, and the Centennial facility up to 70 feet high.

Grp 7-181

BRUNSWICK INDUSTRIAL SITE - SECTIONS



CENTENNIAL INDUSTRIAL SITE - SECTIONS



EIR Figure 3-14 (Rise Grass Valley)

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There is no technical report to provide the detail needed to evaluate the geotechnical viability and safety of these facilities. The potential for this waste to fail under static or seismic loading needs to be professionally evaluated by a qualified engineering contractor. It would be inappropriate to issue a permit for the construction of these waste facilities without proper engineering analyses. To illustrate what could happen, the picture in Photo 1 comes from a waste rock pile at a Nevada mine that failed due to inadequate engineering. While not catastrophic, such failures can cause significant environmental and economic damage.



Photo 1: Waste Rock Dump Failure at the Gold Quarry mine (2005)

The seismic reports discussed in the Geology section of the EIR are not up to date, and even if updated would not meet the requirements for a probabilistic seismic site analysis. Mine waste facilities must be designed to withstand much larger seismic events than required by typical seismic building codes because of the long expected life of the water facilities. According to information provided in the Brunswick and Centennial Industrial Site Geotechnical reports (EIR Appendices H.1 and H.4), a probabilistic and/or deterministic seismic assessment has not been done for the Idaho-Maryland site.

Grp 7-182

In the geotechnical report for the Centennial Industrial Site the mine waste to be used as engineered fill is described as; "*We understand that proposed foundation structures will be constructed on import fill material that will primarily consists of medium dense granular soil composed of silty or clayey sand/gravel, with possible rock fill at depths.*" The term "medium dense granular soil composed of silty or clayey sand/gravel" is not an adequate description of the tailings. Tailings, at a 75 um grind size, the most likely choice for grind size based on the flotation recovery testing done by McClelland Labs, are termed "silt" (see EIR Appendix H.4, Table 5.1-1, Particle Size Gradation, Historical Sand Tailings).

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Grp 7-183

With an equal ratio of tailings to waste rock in the engineered fill, not only is a careful analysis of the geotechnical properties of the tailings important, and currently lacking, but how these two fill sources are mixed is also critical, since the tailings and waste rock have very different geotechnical properties. These analyses are lacking in the EIR and its supporting technical reports.

Grp 7-184

In the EIR, it is also proposed that an alternative for placing the mine waste in the proposed facilities is selling the waste in the local marketplace as fill material. There are several issues that make this proposal unlikely. First, there is liability associated with mine waste. Even if the waste is purported to be contaminant-free, and this waste is associated with mining sulfide mineralization that can release metal contaminants, it is seldom possible to guarantee that all of the waste will be contaminant-free. According the laboratory analysis for the six waste rock samples analyzed for Acid-Base Accounting, the sulfide sulfur content of the waste rock varies from 0.04 - 1.78 % Sulfide Sulfur (EIR Appendix K.2, EMKO 2021, Table 4-8 Tailings & Barren Rock Samples - ABA Results). There is significant variability in the amount of sulfide sulfur, and significant amount of sulfide sulfur (1.78%), recorded in the very limited number of waste rock samples tested. If any of the waste sold as clean fill should cause a problem, the sellers of that material, and the company that produced that material, would likely be legally liable. Just the possibility of legal entanglement keeps virtually all mining companies from selling its waste rock or tailings, and is very likely to make it very difficult to find an independent distributer that is willing to assume this risk.

Grp 7-185

A second issue is one of logistics. The mine waste is produced at a constant rate – 1,000 tons per day, 365 days/year, for the life of the mine. Markets for fill material are typical episodic. For example, there is much more fill material placed during the summer than during the winter. In order to handle surges in the demand for fill material, temporary storage for a significant amount of material would be required by a vendor of this material. If the mining company is going to provide this service itself, then the storage facility should be evaluated as a part of the mine proposal. If the material is to be sold to an independent user, then the viability of that operation should be demonstrated with at least a contract that someone is willing to accept 1,000 tons/day of mine waste.

3.7 Project Components – Reclamation Plan

Most reclamation plans submitted as a part of a mine proposal are largely conceptual in nature, including the reclamation plan accompanying this EIR. However, for those tasks that can be clearly identified as being necessary for mine closure, these tasks should be described with enough detail that the engineering feasibility and cost can be analyzed.

In order to protect the public from incurring the costs associated with an unplanned mine closure, or bankruptcy, the funds should be available to public agencies that are sufficient for those agencies to take over and complete reclamation of the mine, and to perform any water treatment that may be required.

Grp 7-186

At the Idaho-Maryland Mine, it is known that mine openings must be closed, drains must be prepared to collect the seepage that has been coming from the mine, and that will presumably resume after mine closure, and that the mine waste facilities can be closed and safe configuration. However, there are no reclamation engineering specifications, work plans, or cost estimates made for the EIR.

The potential costs for post-closure water treatment, if required, should also be included. However, there is insufficient information on seepage water quality to conduct this analysis.

Financial Assurances for mine closure runs tens to hundreds of millions of dollars, so ignoring these costs puts taxpayers at significant risk of miscalculation at a later date. Because these sums are so substantial, the public should be informed about these costs, and how the costs were estimated.

This is a significant omission in the EIR.

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4.8.2 Existing Environmental Setting – Groundwater Occurrence in Mine Workings

Mine Flooding and Worker Safety

In the discussion of the Union Hill Mine, it is noted, "*The Union Hill Mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine.*"

Grp 7-187

There are two important points to note in this discussion, (1) the Union Hill Mine is very close to the Idaho-Maryland at several levels; and, (2) there has been a possible weak hydraulic connection between the two mines, which is only logical.

The EIR notes that the Union Hills Mine will not be dewatered. The EIR suggests there is no significant hydraulic connection between the mines, but the discussion from the EIR quoted above suggests there could be some connection, and what is not known is whether this hydraulic connectivity could increase in the future.

There is no discussion in the EIR of the potential impacts for the Idaho-Maryland Mine if flooding were to occur during mining. From ITASCA Figure 2-3 (attached as the last page of this document), it can be seen there are extensive abandoned mine working above and adjacent to the Idaho-Maryland mine that will remain flooded after the Idaho-Maryland is dewatered.

If a conduit between these two mine were to open, for instance due to the widening of a fracture related to blasting vibrations or a seismic event, the flood of water into the Idaho-Maryland could be rapid and catastrophic for anyone working in the mine.

This issue must be thoroughly addressed before anyone is permitted to enter the dewatered mine.

4.8.4 Impacts and Mitigation Measures – Water Within Underground Mine Workings

Geochemistry of the tailings

Even though this is nominally the section about the underground mine water, most of the technical information on the geochemistry of the tailings samples is presented here.

Approximately 50% of the mine waste, also referred to as "engineered fill", disposed on the surface will be tailings. The geochemistry of these tailings is important because meteoric waters will infiltrate through the waste, and any leachate products will end up in groundwater, and potentially surface water.

Grp 7-188

Tailings produced in the milling process are generally homogeneous because the physical and chemical processing of the ore remains relatively constant, and the ore is typically blended to maintain a consistent ore grade to facilitate gold recovery. Because of this, fewer tailings samples than waste rock samples are required for leach testing, but those testing samples must be representative of the tailings that will be produced during mine operation.

While Appendix K.2 states that the tailings samples were generated from a "46 kg metallurgical sample". The ore sample used to create the four tailings samples contained 1.6% Sulfur (EIR 2021, p. 4.8-46). The four tailings samples had a sulfur content of 0.06 – 0.12% Sulfur (EIR 2021, p. 4.8-46), with Net Neutralization Potential greater than 100 for all samples (EIR Appendix K.2, EMKO 2021, Table 4-8 Tailings & Barren Rock Samples - ABA Results).

The drill hole intervals this material came from is not stated in the EIR, nor is the time when the metallurgical sample was generated. Again, if an NI 43-101 compliant report that reported a mineral

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resource and/or reserve were available, this basic information would have required and would have been available for the EIR.

In Appendix K.2, EMKO notes that the four samples are of different grind sizes. The size of the tailings particles could have an effect on the rate of leaching. Smaller grain size leads to more rapid leaching of contaminants. Based on the results of the metallurgical testing, a final grind size is generally selected before geochemical testing is done, but a final grind size has not been selected for this project. The different grind sizes of the tailings could have an unquantified effect on the leach testing of the tailings samples.

Grp 7-189

Because the size specification has geotechnical and geochemical implications for both the tailings disposed on the surface, and cemented backfill in the mine, the size specification needs to be disclosed in the EIR. The limited test results available from preliminary tailings tests are not sufficient to make long-term predictions for the geotechnical stability or water quality implications of the tailings.

The method selected for leach testing the tailings and waste rock used distilled water, which is the least aggressive of the leach testing methods. For mining waste, waste rock and tailings, short-term tests typically use a weak acid solution for leach testing in order to simulate the generation of some acid in the waste due to sulfide decomposition. Long-term leach testing, which runs for months rather than hours or days, typically uses distilled water, because natural sulfide decomposition and the accumulation of oxidation products has sufficient time to stabilize.

From Table 4-7 Tailings & Barren Rock Samples - Total Metals and DI-WET Results

Constituent	Test Type	Units	Tailings Samples				Rock Samples					
			F-1	F-2	F-3	F-4	MA-1	MA-2	MA-3	MAA-1	MS-1	S-1
METALS												
Aluminum	Total	mg/Kg	16100	16300	16300	16300	23000	24400	31100	421	22900	41300
	DI-WET	mg/L	0.17	0.18	0.26	0.28	0.94	1.08	0.6	0.49	0.99	0.32
Antimony	Total	mg/Kg	0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	1.1	<0.2	0.6
	DI-WET	mg/L	0.0018	0.0015	0.0031	0.0020	0.0006	0.0041	0.0016	0.0104	0.0021	0.1050
Arsenic	Total	mg/Kg	1.7	1.4	2.000	1.2	0.2	6.1	0.5	34.8	0.7	36.8
	DI-WET	mg/L	0.0018	0.0013	0.0019	0.0014	<0.0002	0.0051	0.0014	0.0148	0.0005	0.1690
Copper	Total	mg/Kg	86	86	87	84	141	43	87	27	89	30
	DI-WET	mg/L	<0.01	0.01	0.02	0.09	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	Total	mg/Kg	35500	36000	35200	35200	45600	42100	54900	15500	33700	36800
	DI-WET	mg/L	<0.03	<0.03	<0.03	<0.03	0.05	0.08	0.20	<0.03	<0.03	0.33
Manganese	Total	mg/Kg	1000	1010	990	994	604	747	1230	311	696	176
	DI-WET	mg/L	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
GENERAL CHEMISTRY PARAMETERS												
Nitrate	DI-WET	mg/L	0.06	0.08	0.28	0.24	<0.02	<0.02	0.05	<0.02	<0.02	<0.02
Sulphate	DI-WET	mg/L	8.40	6.30	8.50	8.70	3.3	1.4	6.60	1.9	1.1	2.8

Grp 7-190

In reviewing the leach test results from Appendix K.2, Table 4-7: Tailings & Barren Rock Samples - Total Metals and DI-WET Results, the following observations are noted:

- Aluminum levels in the leachate are high. Even though the measurement was probably done as Total aluminum, these levels suggest that aluminum leaching could be an issue, and that Dissolved aluminum should be monitored.

Grp 7-191

- There is antimony present, and the water quality standard for antimony is low. Waste rock sample S-1 shows a level of antimony that is well above the water quality standard. Even though there is only a relatively small amount of S-1 rock in the waste, antimony should be monitored.

Grp 7-192

- Arsenic is measured at about 20% of the water quality standard, and is known to be an issue with the existing mine waste. Arsenic could become an issue if localized acidic conditions, or longer exposure time, drive the oxidation reactions.

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Grp 7-193
- Copper being detected at levels that could exceed water quality standards, but the measurement level for the sampling was too high, so we don't know enough about what is going on with copper.

Grp 7-194
- Iron and Manganese are both know to be present in existing mine water and the mine waste at levels that exceed water quality standards, but they are not showing elevated levels in the test data. This strongly suggests that the oxidation taking place in the mine itself, and in the mine waste on the surface, is more aggressive than that being simulated in the leach tests using distilled water.

Grp 7-195
- Nitrate, a residual from blasting, will almost certainly be present at levels significantly higher than projected in these tests.

Grp 7-196
- Similarly, sulfate will be higher than projected once the waste has time to oxidize.

Grp 7-197
- An important constituent, sulfide-sulfur, is not reported on a per-sample basis

Grp 7-198
In the summary of the report (Appendix K.2), EMKO notes that Potential Contaminants of Concern include ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1,2-DCE. To this list, I recommend adding antimony, copper, and nitrate.

Grp 7-199
Leach tests for the paste backfill also need to be completed. It is not appropriate to grant a mining permit that allows the use of this backfill without evaluating the potential long-term effects on water quality.

6.3 Selection of Alternatives – Alternatives Considered in this EIR

The mining project as proposed in this EIR has a fundamental lack of information on the economic viability of the mine, and potential environmental impacts related to geochemistry and water quality.

Grp 7-200
The data submitted in support of this EIR is only sufficient to support an application for dewatering the mine, and for underground exploration drilling. This would provide not only the information that will be required to perform a preliminary economic analysis of the orebody, but would also supply the samples needed for geotechnical and geochemical testing, and for water quality modeling.

The EIR should analyze an Alternative that provides for dewatering and underground exploration. That is the only Alternative that the information provided in this EIR will support.

Thank you for the opportunity to comment on this Draft EIR.

Sincerely;

David M. Chambers, Ph.D., P.Geop.

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References:

EIR 2021. Idaho-Maryland Mine Project Draft Environmental Impact Report, Raney Planning & Management, December 2021

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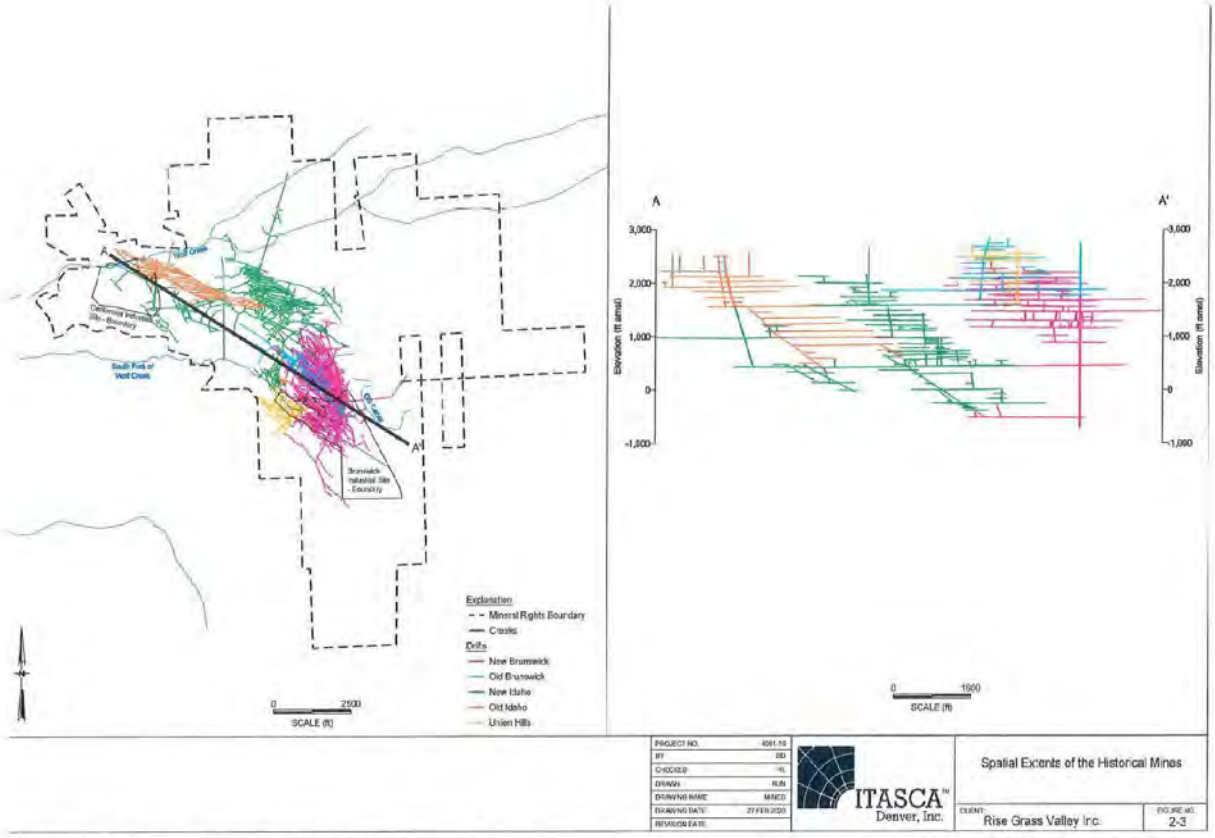

Figure 2-3, from Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine, ITASCA, November 2020

GROUP LETTER 7: RALPH SILBERSTEIN, COMMUNITY ENVIRONMENTAL ADVOCATES FOUNDATION

Response to Comment Grp 7-1
This comment is introductory in nature. The comment alleges that the project would cause long-lasting environmental impacts and that the EIR is inadequate. The commenter's specific comments are discussed in the following responses to comments.

Response to Comment Grp 7-2
Please see Master Response 4 relating to the Separate Centennial Project.

Response to Comment Grp 7-3
Please see Master Response 24 – Project Construction Schedule. As discussed in Master Response 24, the project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce environmental impacts in many areas. As such, the approach taken by the EIR overestimates impacts as compared to a longer construction schedule with less overlapping activities.

Response to Comment Grp 7-4
Please see Master Response 24 – Project Construction Schedule, and Response to Comment Grp 7-3 above.

Response to Comment Grp 7-5
Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Grp 7-6
For responses to the commenter's referenced ASUR Plan Analysis, please see Responses to Comments Grp 7-103 through Grp 7-137.

The comment states that the DEIR does not include any evidence that asbestos levels will not exceed applicable thresholds set forth in the asbestos management plan. However, prior to underground gold mining, intensive planning efforts will be conducted as required under the ASUR plan and as required to meet state and federal regulations and achieve safety, environmental, and economic goals. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the EIR). Underground mine planning, as required in the ASUR plan, includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos to ensure that applicable thresholds are not exceeded. (Id.) In other words, the mandatory mine planning that is required by the DEIR in the ASUR Plan will provide information to the mine operator on asbestos content of rock prior to mining that area. That information can then be used to avoid areas, if any exist, with asbestos content that would make it infeasible to comply with the 0.01% asbestos content limit required by the ASUR Plan.

Additionally, the Health Risk Assessment is based on conservative assumptions, such that the analysis overestimates health impacts rather than underestimates those impacts. Please see Master Response 22 – Conservatism used for Asbestos Assumptions

Based on these conservative assumptions, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Response to Comment Grp 7-7

The commenter asserts that asbestos testing could take up to two weeks before results are known, which could result in impacts to workers prior to obtaining results, as a result of contact with stockpiles and mined material with higher asbestos content. The commenter also states that material will be stockpiled before testing resulting in undisclosed dust and asbestos impacts; however, the commenter's presumption is incorrect as the mined material will be stored in enclosed silos or bins, not in stockpiles. Testing of material will be done in advance by underground drilling rigs, such that the asbestos content of the material to be mined will already be known prior to mining. This is a standard component of modern underground mine planning, and was made an explicit requirement of the ASUR Plan, which will be required under a Condition of Approval. As such the mine operator will know the asbestos content in any rock that is intended to be mined, well before that rock is actually removed, and the workers should not be exposed to rock with unexpected high values of asbestos.

As discussed on page 4.3-61 of the EIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. The purpose of TEM testing in the ASUR Plan, including testing of aboveground rock in the silos, is not to control the fate of the rock and tailings after it reaches surface (that is the purpose of the PLM testing). Rather, the TEM testing, including testing of aboveground rock in the silos, is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. Therefore, the two-week time to receive results from TEM testing of materials at surface allows the achievement of the goals of the ASUR Plan.

In addition to the testing procedures that will be implemented as part of the ASUR Plan, the protection of workers in underground mines from asbestos exposure is also governed by MSHA regulations as discussed on page 4.3-61 and 4.3-20 of the EIR. Accordingly, mine works have redundant layers of protection from asbestos exposure.

Finally, Mitigation Measure 4.3-2 of the EIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Response to Comment Grp 7-8

Please see response to referenced Baseline comment in Response to Comment Grp 21-109. In addition, please see Master Response 9 – Historical Mine Waste at Centennial Site.

Response to Comment Grp 7-9

Please see Master Response 8 – Mine Waste Characterization. The commenter implies that the amount of testing performed on rock cores obtained from the project site is inadequate but does not explain why the number of samples analyzed is not sufficient for CEQA analysis other than a general assertion that more sampling could be done. Additional samples may be required to achieve "engineering level detail" on specific aspects of the rock types expected underground; however, the volume of samples provided is expected to be representative of the overall rock types, and further, engineering level detail is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.) Additionally, the DEIR imposes mitigation measures that require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). The CVRWQCB requires additional waste characterization as part of approving WDRs and also requires ongoing water quality monitoring during the implementation of WDRs to ensure that no water quality impacts will occur. The commenter also asserts that the chain of custody processes are not sufficient, but does not identify any particular issue. Note that the applicant will be required to adhere to any chain of custody requirements applicable for submittal of a RoWD and obtaining WDRs from the CVRWQCB prior to operations.

Response to Comment Grp 7-10

Please see Response to Comment Grp 7-9 above and Master Response 8 – Mine Waste Characterization. The DEIR concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measures 4.8-1(d) and 4.8-1(e) to address these potential impacts. Additional core samples and additional leachate tests would not alter the significance of the impact identified in the DEIR, as it is already considered potentially significant, and would not alter the requirements for mitigation which require additional testing as part of the RoWD and WDR process.

Response to Comment Grp 7-11

Please see Response to Comment Grp 7-9 above and Master Response 8 – Mine Waste Characterization. The locations and descriptions of samples and other geological data are provided in Appendix K.2 of the DEIR. Exploration drill logs are not necessary for the analysis.

Response to Comment Grp 7-12

The commenter states that water samples from the existing mine drains should be considered to define water treatment criteria rather than water sampled from the New Brunswick shaft. However, once mine dewatering commences the flow of water through the mine workings would be altered from its current condition with water pumped up the New Brunswick shaft rather than flowing through the historic mine workings to the current mine drains. As such, the water from the mine drains is not likely representative of water that would be encountered during dewatering prior to treatment and discharge during mine dewatering. However, the elevated arsenic levels in the drain versus the New Brunswick shaft have been noted in the EIR (page 4.8-21) and the water treatment plant is designed to treat arsenic in mine water if present during mine dewatering. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 7-13

The commenter alleges that the water quality in the nearby Empire Mine is evidence that the project will create acid rock drainage, and that the commenter prefers a different method for

testing the rock found within the mine. However, the geology in the project area is different from that in the Empire mine due to carbonate minerals in the project host rock (see page 13 of Appendix K.2), which results in the lower potential for acid rock drainage; thus, the method used for testing rock is appropriate for this mine. Further, mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRWQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). The CVRWQCB will determine the appropriate method of rock testing for the purposes of developing WDRs. See Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 7-14

See Master Response 8 – Mine Waste Characterization. Based on the geology of the rock encountered in the core drilling at the project site, and testing of those samples, acid rock drainage is not expected. (DEIR p. 4.8-50.) Nonetheless, the EIR has concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measures 4.8-1(d) and 4.8-1(e) to address these potential impacts and reduce the impact to less than significant. The purpose of the Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board is to ensure the effluent from mine waste does not impact water quality. Further testing will be required as part of the RoWD and WDR process as required by Mitigation Measures 4.8-1(d) and 4.8-1(e) such that any impacts will be mitigated. WDRs for the project will require monitoring and reporting to ensure compliance.

Response to Comment Grp 7-15

The commenter asserts that impacts to water quality must be considered significant and unavoidable. However, testing of rock from the project site and required mitigation measures provide substantial evidence that water quality impacts will be reduced below a level of significance. See Master Response 8 – Mine Waste Characterization and Responses 19-9 to 19-14 above. Contrary to the commenter's assertion, page 4.8-50 of the DEIR does not discuss "an expedited General Order". It discusses the RoWD and WDR requirements for mine waste which are required under Mitigation Measures 4.8-1(d) and 4.8-1(e).

Based on the testing of rock material from the project site, the proposed project would likely produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

As discussed on page 4.8-50, California Waste Extraction (WET) testing was performed on samples of mine materials and the results of these tests suggest the engineered fill (barren rock and sand tailings) will be a Group C mining waste. However, the determination of waste classification is conducted through the RoWD and WDR process required by Mitigation Measures 4.8-1(d) and 4.8-1(e). Extensive testing and sampling would be conducted for the RoWD and before approval of the WDR. See Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 7-16

Please see response to referenced Baseline comment. Please see Response to Comment Grp 21-124.

Response to Comment Grp 7-17

For responses to the commenter's referenced HRA Critique, please see Responses to Comments Grp 7-138 through Grp 7-154.

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Grp 7-18

For responses to the commenter's referenced Sampling Procedures, please see Responses to Comments Grp 7-155 through Grp 7-172.

Please see Master Response 21 – Conservatism of Silica Assumptions and Master Response 22 – Conservatism used for Asbestos Assumptions. The assumed crystalline silica content and modeling of respirable silica is conservative and overestimates the relevant exposure in any situation. Therefore, sampling of materials for crystalline silica content is not required.

Response to Comment Grp 7-19

The commenter states that the DEIR should include asbestos mitigation as well as mitigation for impacts associated with TACs, and silica. The DEIR analyzes impacts associated with asbestos, TACs and silica and includes mitigation measures to reduce impacts to less than significant. (See DEIR, Chapter 4.3.) Please see Master Response 22 – Conservatism used for Asbestos Assessment. Mitigation Measure 4.3-2 of the EIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

The assumed crystalline silica content and modeling of respirable silica is conservative and overestimates the relevant exposure in any situation. Please see Master Response 21 – Conservatism of Silica Assumptions.

The commenter also questions the 30-year exposure duration assumption included in the Health Risk Assessment (HRA) prepared for the project. Notably, the 30-year exposure assumption is based on the Office of Environmental Health Hazard Assessment's (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (2015) (OEHHA Guidelines), which states that:

> OEHHA recommends that an exposure duration (residency time) of 30 years be used to estimate individual cancer risk to the maximally exposed individual resident (MEIR)… OEHHA also recommends that the 30-year exposure duration be used as the basis for public notification and risk reduction audits and plans.

Based on data from the U.S. EPA, the 30-year residency is considered a high-end estimate of residency time. As standard practice, the duration of exposure is based on 30-year sensitive receptor residency rather than the life of the project. Further, additional conservatism is layered into OEHHA's recommendations that were incorporated into the HRA prepared for the project, including the assumption that exposure at all sensitive residential receptors would begin in the 3rd trimester of gestation and that the baby would be born and would grow through childhood and adulthood at the same home for the next 30 years. This scenario is unlikely to happen, yet it captures a conservative situation for health risk assessment purposes.

Response to Comment Grp 7-20

The commenter disagrees with the methods and conclusions of the groundwater model. The groundwater model used for the DEIR was calibrated on historic groundwater inflows into the mine, the current and historical water level in the Union Hill Mine, the current water level in the New Brunswick Shaft, ground measured water levels in domestic water wells in the area and base flow rates of Wolf Creek and South Fork Wolf Creek.

The commenter asserts that the water level measurements used to calibrate the groundwater model are insufficient. However, the groundwater model is calibrated to measured water levels in domestic wells and not just the water level in the Union Hill Mine. Itasca simulated pre-historical mining conditions (before any mining had taken place). Itasca calibrated the model against water levels measured in wells outside of the mine area. (Section 4.5). Using the simulated groundwater from the pre-historical mining condition, Itasca calibrated the model using the known inflow rates and underground mine workings from two periods of mining. The Idaho mine in 1918 and the entire connected Idaho-Maryland-Brunswick mine in 1956. The model was also calibrated against the known level of water in the Union Hill mine in 1956. (Section 4.6 pages 21-22). The drain nodes for the mine workings were turned off and mine voids were simulated with a zone of high K and the drains along Wolf Creek (which currently drain the mine) were added at their known elevation. Please see Memorandum Itasca Groundwater Model attached to the Final EIR as Appendix O. The model was then compared against water levels measured in wells in the mine area. The model was found to be correctly calibrated to the measured water levels. (Section 4.5 page 22).

As stated on page 4.8-41 of the DEIR, the county's independent expert West Yost found that the groundwater model was acceptably calibrated pursuant to industry practices. Accordingly, the DEIR contains concurrence of multiple experts on the suitability of the groundwater model and as such, constitutes substantial evidence of the significance conclusions.

Response to Comment Grp 7-21

Please see Response to Comment Grp 7-20 which describes the calibration of the groundwater model. The current flow rate of mine water from the drains was not used for the calibration of the groundwater model because the preferential pipe flow in the mine workings is not simulated in the model and the purpose of the model is to calibrate to "current" 2019 groundwater levels, based on measurements taken from 1994 through 2007, and the current water level in the mine which is controlled by the drain outlet elevations. Additionally, there could be additional preferential recharge from surface runoff through mine workings reporting to the drains. This extra recharge, not related to groundwater flow, is not quantifiable and could result in inaccurate calibration of the groundwater model

The outflow data of the drains from previous studies is similar to current measurements. Please see Response to Comment Grp 7-68.

The commenter suggests that more measurements of water level in the New Brunswick shaft are needed. However, historic and recent observation show that additional measurements are not necessary, as the water level in the Brunswick shaft does not vary significantly over time because groundwater in the Brunswick mine, as observed in the New Brunswick shaft, has a pathway to flow to the drains along Wolf Creek through tunnels in the B2300 and B3280 levels. (See page 4.8-44 and Figure 4.8-7 of the DEIR.)

Response to Comment Grp 7-22

The current flow rate of mine water from the drains was not used for the construction of the groundwater model and is not necessary for the groundwater modelling method used in the DEIR. Accordingly, the commenter's request for inflow/outflow data is not relevant to the groundwater model and the assessment of groundwater impacts. Please see Response to Comment Grp 19-20 and Grp 19-21.

Response to Comment Grp 7-23

The commenter states that data from private wells is old and is limited to a few years without usage data provided. Contrary to the commenter's assertion, water level data has been collected for many years over a period spanning two decades. As stated on page 26 of Appendix K.2, monitoring of water level in wells for up to 79 wells was undertaken from 1995-2001 and 2003-2007. As noted in the report, no long-term increasing or decreasing trends are observed in the data. Therefore, the age of the sample data does not limit the usefulness of this data. Consumptive water uses from individual wells are not considered because of the lack of consumptive-use data and the fact that consumptive groundwater well water use is small relative to regional groundwater flow. In addition, much of the water pumped for domestic use would be recharged to groundwater by septic tanks/leach fields and landscape irrigation. Please see Itasca Clarification Memo attached to the Final EIR as Appendix O.

However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(a) requires that a projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. If the water level impact assessment showed a potential impact to wells outside of the E. Bennett area, assuming the 100% safety factor, the applicant would be required to mitigate this impact before it occurs in accordance with Mitigation Measure 4.8-2(b). The mitigation would be for properties which may be potentially impacted as determined in the projected water-level impact assessment. As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett

area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The 10% drawdown threshold of significance is extremely conservative and, in most cases, would not lower the water level below the casing of the domestic well. Therefore, well mitigation may not be required after inspection. If reduction of the water column was great enough to reduce the well's yield, a simple adjustment to the pumping system may only be required. For example, by pumping at a lessor rate over a longer duration and if necessary, installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service to a group of wells. The Well Mitigation Plan has been modified to clarify the actions that would be taken as described above.

Response to Comment Grp 7-24

The commenter asserts that the groundwater model is incorrect because it does not account for the low-permeability engineered fill to be placed on the Centennial and Brunswick sites. Decreasing the recharge rate over the small area where the engineered fill will be placed would be trivial in comparison to the sensitivity scenarios already performed for the analysis. Please see Response to Comment Grp 7-78.

Response to Comment Grp 7-25

The commenter asserts that the groundwater model fails to account for the impacts of the proposed new shaft and other existing mine features within a few hundred feet of the surface. However, the service shaft was included in the ground water model. Please see Response to Comment Grp 7-80. All mine workings, including those within a few hundred feet of the surface, were included in the groundwater model (see Figure 2-3 of Appendix K.3).

Response to Comment Grp 7-26

The commenter suggests that the faults within the project area were not considered in the groundwater model; however, faults were considered in the groundwater model as discussed in Appendix K.3 to the DEIR. Please see Response to Comment Grp 7-64 through Grp 7-94.

Response to Comment Grp 7-27

The commenter asserts that the DEIR should include monitoring and protections for dewatering due to the faults and irregularities in fractured bedrock. The DEIR includes a groundwater analysis that accounts for the faults and irregularities in the bedrock to determine the extent and severity of impacts to groundwater resources and wells. Further, groundwater monitoring is required for the project, along with other mitigation for dewatering impacts as set forth in Mitigation Measures 4.8-2(a) through 4.8-2(c). See Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring & Mitigation.

Response to Comment Grp 7-28

The commenter states that the DEIR acknowledges that more groundwater level data is needed to assess the potential impacts of the proposed project on groundwater levels. The commenter is not correct. The analysis of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation (see page 4.8-66 of the DEIR). A groundwater monitoring plan (GMP) will be implemented by the applicant to assess how the hydrogeologic system responds to mining, whether the measured results are within those modeled under the various scenarios discussed above. This response to dewatering cannot be measured until mine dewatering commences. The

commenter implies that the mitigation is not achievable, enforceable, and capable of reducing the project's impacts. However, the GMP along with the requirement that the applicant provide water to 30 parcels and provide water to any other parcels with wells that are impacted by the project ensures that the mitigation is enforceable by the County, achievable through water replacement requirements, and capable of reducing the project's impacts.

The commenter asserts that groundwater monitoring networks need to be installed prior to dewatering. This is already required at least 12 months in advance per Mitigation Measure 4.8-2(a). This water level monitoring will provide the baseline levels prior to dewatering. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.

Please see Response to Comment Grp 21-110.

Response to Comment Grp 7-29

Please see Master Response 15 and Response to Comment Grp 21-119.

Response to Comment Grp 7-30

Please see Response to Comment Grp 21-118.

Response to Comment Grp 7-31

The commenter asserts that the DEIR failed to analyze impacts relating to South Fork Wolf Creek. However, DEIR Chapter 4.4 and Chapter 4.8 analyzed potential project impacts to biological resources and hydrology and water quality affecting South Fork Wolf Creek, respectively. As outlined in Section 4.4.1 (Introduction) and included as Appendix F, eleven different technical studies were prepared documenting existing environmental conditions and analyzing potential biological impacts from the proposed project. This includes a specific biological assessment technical report analyzing treated project water discharge to South Fork Wolf Creek (see Appendix F.10). These technical reports were prepared by biologists with over 30 years of local expertise in the species and environment within the project site. These technical studies were then peer reviewed by the County and their environmental consultants. The peer review of biology reports was conducted by a biological firm with similar local experience that resulted in several rounds of review and revision prior to the County's acceptance of these reports for use in the DEIR. As a result, numerous biological experts with local knowledge have analyzed, and reviewed the characterization and analysis included in these biological technical reports prior to their use and incorporation into the DEIR. In addition, as summarized in Chapter 4.8, and included in appendix H and K, ten different technical reports and peer reviews related to hydrology and water quality were prepared documenting or confirming ground and surface water conditions at the site and potential impacts from the proposed project. Specifically, two technical reports (Appendix K.1 and K.2) analyzed treated water discharge from the project and its potential impact to South Wolf Creek. These technical documents were also peer reviewed by the County and their environmental consultant.

Special status species that may utilize South Wolf Creek were analyzed in Impact 4.4-2 including Foothill Yellow-Legged Frog (FYLF) and Western Pond Turtle. Analysis of the Olive-sided flycatcher, Willow flycatcher, Yellow-breasted chat, and Yellow warbler has been added to Section 4.4 in the Final EIR. No significant impacts to these species was identified. As discussed in Impact

4.4-2, VES method surveys were conducted for FYLF along South Fork Wolf Creek within the project site and portions that flow through public property within Empire Mine State Historic Park. FYLF were not identified during these surveys. Impact 4.4-2 summarizes site and hydrologic conditions in South Wolf Creek within the project site and offsite demonstrating marginal habitat for FYLF. In addition, Impact 4.4-2 addressed potential treated mine water discharge impacts to FYLF and benthic macroinvertebrates and concluded this impact would not be adverse. As explained in Impact 4.4-2, and detailed in Chapter 4.8 and Appendix K.1, the proposed project will discharge a maximum of 5.6 cubic feet per second (cfs) of treated mine water to South Fork Wolf Creek. Base flow in South Fork Wolf Creek may range from 0.17 cfs in the summer to 6.5 cfs in the winter between storm events. Sediment pebble count analysis (see Appendix K.1) indicates that the flow rate at which sediment within the channel may become mobilized ranges from 20 cfs to 90 cfs. With the addition of the maximum proposed discharge of 5.6 cfs and increasing measured baseflows by a 50 percent safety factor, post-project baseflows during nonstorm periods would be expected to range between approximately 5.8 cfs and 15 cfs. These estimates are less than 23 cfs, the threshold for bedload sediment mobility and well below flows that commonly exhibit significant work on the channel (with minimal bed sediment becoming mobilized and minimal or no bank erosion, bed scour, or channel avulsion). The DEIR therefore concludes potential downstream impacts to the stream channel and associated riparian zone along both sides of South Fork Wolf Creek from the additional discharge of 5.6 cfs would be minimal on sensitive biological resources, such as foothill yellow-legged frog, and do not represent a potential significant impact to the stream channel or associated riparian zone within South Fork Wolf Creek. Additionally, peak flows on the South Fork Wolf Creek are expected to be lower than pre-project conditions due to the stormwater detention basin being constructed on the project site as part of the project.

Response to Comment Grp 7-32

The commenter asserts that the project allows continued mine dewatering up to a rate of 2,500 gpm but did not assess impacts of that higher rate for the operational length of the mine. However, the hydrology and geomorphic analysis specifically considered the discharge of treated mine water at 2,500 gpm throughout operations and not just for initial dewatering. As stated on page 71 of Appendix K.2, the maximum discharge rate permitted will be 2,500 gpm, which will allow flexibility for unexpected seasonal inflows, operational issues, and increased groundwater inflows from the expansion of the mine during operations.

Response to Comment Grp 7-33

The hydrology and geomorphic analysis considered the seasonality of stream flow as is discussed throughout these reports (see Appendix K.1 & K.2 of the DEIR). Seasonal changes in water temperature have been considered in the DEIR, please see Master Response 32 – Temperature of Mine Water Discharge. Seasonal differences in Specific Conductance and habitat for BMI have no relevance to the analysis of the DEIR as the project discharge will be required to meet fixed thresholds for conductance (see below) and metals content (see Chapter 4.8 of the DEIR) that do not vary based on season and the commenter does not provide any reason why it should be considered in the DEIR.

There are no US EPA water quality criteria for the protection of aquatic life for electrical conductivity, total dissolved solids, and sulphate (See page D-34 of Order R5-2022-0006). However, the secondary MCL for Electrical conductivity of 900 umhos/com is the recommended level for the protection of agricultural supply by the Central Valley Water Board (See page D-34 and D-35 of Order R5-2022-0006). As discussed on page 4-5 of Appendix K.4, electrical

conductivity (EC) is associated with Total Dissolved Solids (TDS). Appendix K.2 listed EC values for the New Brunswick Shaft water as approximately 385 µS/cm. The mobilized divalent ions from the carbonate and sulfide minerals would add to that specific conductance, although it would require significant contributions of Ca, Mg, and SO4 to surpass the NPDES CAG995002 screening level of 900 uS/cm. However, if treatment is deemed necessary for TDS mitigation at some point during mining operations, it is Linkan's opinion that mobile ion exchange water softeners should be deployed as opposed to building additional permanent infrastructure that may not be needed or only needed for relatively short periods. (See DEIR Appendix K.4.) These mobile units are readily available, and various vendors offer the service of replacing them as necessary as the resin becomes spent and in need of regeneration. Additionally, the resins used for these constituents are common throughout the industry for softening water and do not pose a health or environmental risk. Therefore, the proposed water treatment plant is capable of ensuring that conductance of discharged mine water meets water quality goals and the required Notice of Applicability would ensure compliance (Please see Master Response 35 – Discharge to South Fork Wolf Creek).

Response to Comment Grp 7-34

The impacts to surface vegetation from ground water drawdown was considered in the hydrology analysis. Please see Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Grp 7-35

Please see Responses to Comments Grp 32-39 and Grp 32-40 (Wolf Creek Community Alliance).

Response to Comment Grp 7-36

Please see Master Response 32 – Temperature of Mine Water Discharge and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 7-37

Please see response to referenced Baseline comment – Response to Comment Grp 21-127 and Master Response 27.

Response to Comment Grp 7-38

The commenter assumes that if the Centennial site were not available for fill placement, that fill would be immediately hauled to offsite locations which would result in CO2 and NOx emissions exceeding thresholds of significance. However, if the Centennial site were not available, fill placement would take place initially at the Brunswick site rather than being immediately hauled to local and regional construction projects. As stated on page 1-3 of the DEIR, "If the separate DTSC cleanup project is not approved by DTSC and completed within the term of the Idaho-Maryland Mine Project use permit, engineered fill would be placed on the Brunswick site, but not the Centennial site, and the remainder would be hauled to local and regional markets." Moreover, the DEIR already analyzed impacts related to hauling of material to local and regional markets. (Page 1-3 of the DEIR.) GHG emission and NOx emissions would not exceed thresholds in this scenario. Please see response to referenced Baseline comment – Response to Comment Grp 21-122. The applicant has agreed to a condition of approval requiring that if the Centennial Site is not available to accept engineered fill when project operations commence, that the following conditions apply: (a) the engineered fill material will be first placed at the Brunswick Site until that site is at capacity prior to selling waste rock or tailings offsite; or, (b) waste rock or tailings materials sold offsite will be transported in electric trucks.

Response to Comment Grp 7-39

Please see Master Response 25 - Nevada County Energy Action Plan. As stated on page 4.3-89 of the EIR, The Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D). Therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and the project was found to be consistent with the EAP. (DEIR p. 4.3-90.)

Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Grp 7-40

A net zero threshold for GHG emissions is not required for the project. Please see response to referenced Salter comment – Response to Comment Grp 21-130.

Response to Comment Grp 7-41

Please see response to referenced Salter comment – Response to Comment Grp 21-131 through Grp 21-133.

Response to Comment Grp 7-42

Please see response to referenced Salter comment – Response to Comment Grp 21-143 and Grp 21-144.

Response to Comment Grp 7-43

Please see response to referenced CSP comment – Response to Comment Grp 7-188.

Response to Comment Grp 7-44

Please see response to referenced “mine exhaust moisture” comment – Response to Comment Grp 7-95.

Response to Comment Grp 7-45

Please see response to referenced “faulting hazard” comment – Response to Comment Grp 7-96. In addition, please see response to referenced CSP comment – Response to Comment Grp 7-183.

Response to Comment Grp 7-46

The DEIR includes a comprehensive analysis of the potential hazards due to seismic activity in Chapter 4.6, Geology, Soils, and Mineral Resources. Please see Responses to Comments Grp 7-96 and Grp 7-183.

Response to Comment Grp 7-47

Please see Master Response 4 relating to the Separate Centennial Project.

Response to Comment Grp 7-48

Please see Master Response 1. The commenter provides no specific reason why they believe health issues and noise impacts are vastly underestimated. These issues have been analyzed in the DEIR.

Response to Comment Grp 7-49

Mine waste and related run-off is managed by the Waste Discharge Requirements, per CVRWQB requirements. Please see Master Response 8 – Mine Waste Characterization. In addition, please see Response to Comment Grp 7-7 regarding stockpiling concerns.

Response to Comment Grp 7-50

Please see Responses to Comment 9-5 through 9-7. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (CCR Title 14 Section 15126.4).

Response to Comment Grp 7-51

Asbestos and silica release have been evaluated in the DEIR. Please see Master Responses 21 and 22.

Response to Comment Grp 7-52

The commenter provides no specific reason why they believe the groundwater model has significant errors, omissions, and is unreliable. These issues have been analyzed in the DEIR. Please see Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 7-53

The commenter provides no specific reason why they believe well monitoring is inadequate. These issues have been analyzed in the DEIR. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 7-54

The commenter claims the DEIR is inadequate under CEQA, but provides no specific reasons in this comment. The commenter's specific comments are addressed in the preceding responses. No further response is required.

Response to Comment Grp 7-55

This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-56

This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-57

This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-58

This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-59
This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-60
This comment provides the file name of a referenced document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-61
This comment provides the name of a cited document. Responses to the comments in the referenced document are provided in Group Letter 21. No response is required.

Response to Comment Grp 7-62
This comment provides the name of a cited document. Responses to the comments in the referenced document are provided in Group Letter 21. No response is required.

Response to Comment Grp 7-63
This comment provides the name of a cited document. Responses to the comments in the referenced document are provided subsequently in this letter. No response is required.

Response to Comment Grp 7-64
The commenter asserts that there is "scant data" relating to the groundwater outflow values reported in the DEIR. However, measured outflows from the drains were completed by EMKO in April 2019 for the preparation of the Groundwater Hydrology and Water Quality Analysis (Appendix K.2 of the EIR) and are presented in Section 3.3.4 of that report. As discussed in the responses below, existing drain outflow is not relevant to the groundwater model, therefore additional flow measurements are not necessary.

Response to Comment Grp 7-65
There have not been seasonal flow measurements at the drains to determine the seasonal variation. The current flow rate from the drains was not used for the preparation or calibration of the Groundwater Model and therefore additional measurements are not relevant to the analysis.

Response to Comment Grp 7-66
The commenter asks what the current outflows are at the Wolf Creek drains under the current model. In the calibration of the model during recovery (1956 to 2019), mine voids were simulated with a zone of high K (5,000 ft/day) and high specific yield (effective porosity of 50%) for the area with drifts and raises. The drain nodes for the mine workings were turned off. The drains along Wolf Creek were simulated as drained with surveyed elevated from 2,497 ft to 2,502 ft amsl. The model recovered water level was then compared against measured groundwater levels in domestic wells in the mine area. Please see Itasca Memo attached to the EIR as Appendix K.3. The current flow rate from the drains was not used for the calibration of the Groundwater Model as explained in Response to Comment Grp 7-21. Therefore, a comparison to the measured flow rate is not relevant to the preparation of the model.

Response to Comment Grp 7-67
Please see Response to Comment Grp 7-68.

Response to Comment Grp 7-68

The commenter asserts that the groundwater outflow discussed in earlier reports for previously proposed mining projects at the site disclosed different outflow volumes from the mine into Wolf Creek. However, this discrepancy is not relevant to the impact analysis in the DEIR, as the Groundwater Model used in the DEIR did not model the current outflow at the drains. The report mentioned by the commenter is a report titled Idaho-Maryland Mine Technical Assessment prepared by James Askew Associates Inc in May 1991. The reference to 500 – 1200 gpm is the historic mine inflow during operations (when the mine was dewatered) as is made clear in Sections 2.3.1 and 7.2.4 of that report. There appears to have been a mistake in drafting of some sections of this report in 1991 where the historic groundwater inflow into the mine is incorrectly attributed to represent the flow rate from the mine drains. This was clearly a drafting error in the report as can be confirmed by reading the historic report. For example, on page 7 of Appendix C, James Askew Associates estimated 150-200 gpm would be lost from the mine discharges when the mine is dewatered (rather than 500 -1200 gpm). In Table 2 of Appendix C, the report provides the measured flow from the drains taken on March 21st 1991. This table provides the following flow data for the drains: IMD-1 = 50 gpm, ED-1 = 110 gpm, IMD-2 = 30 gpm, Drain = 20 gpm (across the street from Roto-Rooter building). These measurements of drain flow are similar to measurements of flow presented in Appendix K.2 of the DEIR.

Response to Comment Grp 7-69

The current flow rate from the drains was not used for the calibration of the Groundwater Model and therefore additional measurements would not be relevant to the analysis. Please see Response to Comment Grp 19-21, Grp 19-66 and Grp 19-68.

The goal of the predictions prepared in the groundwater model is to show the location and the magnitude of the estimated drawdowns relative to the baseline (2019 current condition) in order to determine the potential impact of the project to domestic water wells. A water budget/balance is not necessary to complete this goal and therefore not relevant to the analysis of the DEIR. The commenter does not explain how monthly water budgets would be used or how they would alter the conclusion in the DEIR.

Response to Comment Grp 7-70

The commenter asserts that the analysis of seasonal measurements of the level of water in the mine is flawed and does not support the transmissivity assumptions used in the groundwater model. However, the commenter's assumptions about the analysis are incorrect, as the observations presented in Section 3.3.3.3 of Appendix K.2 of the DEIR are not used as the basis for estimating transmissivity values used in the Groundwater Model. Section 3.3.3.3 of Appendix K.2 of the DEIR discusses the water level in the mine which remains relatively constant at the elevations of the mine drains and is not correlated with rainfall. As the commenter mentions, and is discussed in Section 3.5.2 of the report, the water level in the mine is controlled by the elevation of the mine drains. Domestic wells, discussed in Section 3.3.2.2, show a seasonal fluctuation between wet and dry parts of the year that remains constant over many years. If a domestic well, where ground water levels are higher than the level of water in the mine, were directly connected to the mine workings, the groundwater level in the wells would be controlled by the water level in the mine and a correlation would be observed. As described on page 81 of Appendix K.2, the lack of a seasonal pattern in the mine water levels indicates that the mine workings are not directly connected to the wells by through-going fractures but are instead interconnected by a complex pattern of many fractures present throughout the bedrock.

Response to Comment Grp 7-71

The commenter asserts that seepage of water could occur in the more permeable zone near the surface. The DEIR's analysis concurs that seepage into the mine shafts in the more permeable region near surface is occurring as discussed in Section 3.5.2 of DEIR Appendix K.2.

Response to Comment Grp 7-72

As discussed in Section 3.5.2 of the report, the water level in the mine is controlled by the elevation of the mine drains. There are multiple mine drains at different elevations as shown in Table 3-2, with the East Eureka Drain at ~2497 ft msl, the East Eureka shaft at 2501 ft msl, and the Eureka Drain at 2502 ft msl. If the water height in the Brunswick shaft increases the hydraulic head also increases and the additional drains at higher elevations start to discharge water and consequently the resistance to flow decreases. The physical layout of the shafts tunnels and drains therefore ensure that the water level in the shaft is maintained within a few feet throughout the years and seasons. Therefore, the water level in the mine is not expected to be consistently correlated with rainfall. The fluctuations in the water levels identified in this comment for certain years are less than four feet in any given year, in contrast the seasonal fluctuations observed in domestic wells in the project vicinity are typically several tens of feet per year (see discussion in Appendix K.2 of the DEIR and the Response to Comment Grp 7-77, below). The fluctuations observed in the water levels in the shaft are nominal, at best, compared to the magnitude of the fluctuations in the actual groundwater levels and the variations in the amount of rainfall from year to year. The commenter's requests for more granularity of data would serve no purpose because the relationship of the water elevation in the shaft to the drain elevations is well understood.

Response to Comment Grp 7-73

Revising the graph in Figure 3-7 to 68 inches would not show a direct correlation between precipitation and water level in the shaft. As can be seen in the graph the water levels in the shaft taken by EMKO in 2018 and 2019 only vary by 2 feet. The water level in the mine is controlled by the elevation of the mine drains and not consistently correlated with rainfall. Please see Response to Comment Grp 7-72.

Response to Comment Grp 7-74

As stated in Appendix K.2, the water level in shafts during this time period were measured by Idaho-Maryland Mining Corporation and presented in a report titled Domestic Well Monitoring Baseline Report (2007). The table of measurements from this report is reproduced below. In March 2005 the water elevation is reported at 2491.8 ft and in July 2005 reported at 2488.2 ft. A few months later in September 2005 the water elevation is reported at 2490.8 ft. Then in December 2005 at an elevation of 2488.4 ft. These differences in water elevation are within a few feet. The water elevation in winter (December 2005) is nearly identical to the water elevation in mid-summer (July 2005). A consistent seasonal correlation is not implied by this data. The water level in the mine is controlled by the elevation of the mine drains and not consistently correlated with rainfall. Please see Response to Comment Grp 19-72.

Table 4 – New Brunswick and Round Hole Shaft Water Elevations

New Brunswick	2750 Feet Collar Elevation			
Date	Depth to Water	Units	Water Elevation	Units
3/28/2003	268	Feet	2482	Feet
6/13/2003	258.38	Feet	2491.62	Feet
9/12/2003	258.88	Feet	2491.12	Feet
6/11/2004	168.68	Feet	2581.32	Feet
9/17/2004	258.46	Feet	2491.54	Feet
12/10/2004	257.87	Feet	2492.13	Feet
3/11/2005	258.23	Feet	2491.77	Feet
7/18/2005	261.84	Feet	2488.16	Feet
9/16/2005	259.18	Feet	2490.82	Feet
12/22/2005	261.64	Feet	2488.36	Feet
3/16/2006	260.76	Feet	2489.24	Feet
6/23/2006	263.47	Feet	2486.53	Feet
9/22/2006	262.59	Feet	2487.41	Feet
	Average Elevation		2496.3	

Round Hole	2665 Feet Collar Elevation			
Date	Depth to Water	Units	Water Elevation	Units
3/28/2003	175	Feet	2490	Feet
6/20/2003	174.47	Feet	2490.53	Feet
9/12/2003	175.46	Feet	2489.54	Feet
6/11/2004	174.68	Feet	2490.32	Feet
9/17/2004	174.07	Feet	2490.93	Feet
3/11/2005	174.29	Feet	2490.71	Feet
7/18/2005	175.16	Feet	2489.84	Feet
9/16/2005	175.17	Feet	2489.83	Feet
12/22/2005	178.81	Feet	2486.19	Feet
3/16/2006	175.51	Feet	2489.49	Feet
6/28/2006	176.44	Feet	2488.56	Feet
	Average Elevation		2489.6	

Response to Comment Grp 7-75

The observations presented in Section 3.3.3.3 of Appendix K.2 of the DEIR are not used as the basis for estimating transmissivity values used in the Groundwater Model. The commenter's statements are based on a misunderstanding of the groundwater model and the data used to create the model.

The volume of water inflow into the mine is correlated with seasonal rainfall as shown by the range of historic inflows into the mine during operations as disclosed in the DEIR. As discussed in Section 3.5.2 of the report, the water level in the mine is controlled by the elevation of the mine drains.

Response to Comment Grp 7-76

The current flow rate from the drains was not used for the calibration of the Groundwater Model and therefore additional measurements would not be relevant to the analysis, please see Response to Comment Grp 19-21. An estimate of transmissivity versus depth was prepared by EMKO based on well completion reports as discussed in Section 3.3.5 of the Appendix K.2 of the DEIR. The Ground Water Model prepared by Itasca (Appendix K.3 of the DEIR) assigned hydraulic conductivity (K) values derived from reference values and depth as discussed in Section 4.3.1 of that report. After calibration, the assigned K values were found to be within the ranges of EMKO's estimated K values and literature values.

Response to Comment Grp 7-77

As disclosed in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations that may range from 10 feet to 50 feet between wet and dry times of the year but remain relatively consistent from year to year within each individual well. During the monitoring period, several years with below normal rainfall occurred (2001, 2004, and 2007), multiple years with above normal rainfall occurred (1995-1998 and 2006), and several years of near-normal rainfall occurred (1999, 2000, 2002, 2003, 2005). Despite large variations

in annual rainfall from year to year, the seasonal water level cycles in individual wells remain consistent over time and the overall water levels shown on the hydrographs for each well do not fluctuate based on wet or dry climatic cycles.

Based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge, as described in Section 3.2, appears to be consistent from year to year and is not affected substantially by drought or wet cycles.

Itasca performed an analysis of the impacts of changing recharge on predicted inflows to the mine and the resulting impacts to drawdowns in shallow groundwater. Changes in recharge would address changes in precipitation. These sensitivity scenarios (Scenarios 4 and 5) are discussed in Section 5.4 of Appendix K.3 of the DEIR. The results are that increasing or decreasing recharge by 50% only changes the predicted inflows to the mine by +/- 3% compared to the base case. The small changes in predicted inflows are due to the low Ks of the deeper geologic units where the mining will occur. Higher recharge reduces the area of drawdown. If the recharge rate in the model domain is decreased by 50%, the extent of the 5-ft drawdown isopleth is larger than in the Base-Case Scenario, as decreased recharge impacts the shallow water-bearing zones more than the deep zone. The 5-ft drawdown isopleth is generally still within the mineral-rights boundary. As shown on Figure 5-9 of Appendix K.3, the simulated 5-foot drawdown contour for Scenario 5 is very similar to the other sensitivity scenarios except for an expansion of the 5-ft drawdown to the south-east towards the greenhorn area by approximately 1500 feet. As further discussed on page 8 of Appendix K.3 of the DEIR, the consistent annual recharge may be due to the limitations of recharge in fractured bedrock, where the annual rainfall amount may be greater than the capacity of the fractures to accept additional flow. In this situation, increases or decreases in the annual rainfall due to climatic cycles do not have appreciable effects on the amount of water that can be recharged because the capacity of the fractures to transmit water in the subsurface is near its maximum. Thus, there may not be a substantial variation in recharge to the water-bearing geologic materials in the project area. Nevertheless, the sensitivity of the model to changes in recharge has been evaluated. The future effects of climate change on groundwater recharge are unknown and CEQA does not require the analysis of speculative impacts. Please see Master Response 16 - Drought and Climate Change. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As the impact of climate change on recharge is speculative, this impact need not be analyzed in an EIR. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. An increase in drawdown caused by the project due to reduced groundwater recharge would be detected in the required well monitoring and well mitigation plans. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). Ongoing groundwater monitoring would be required, and groundwater-level information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis and submitted in report form to the Nevada County. Mitigation Measure 4.8-2(b) requires, if based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project Applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified.

Consumptive water uses from individual wells are not considered because of the lack of consumptive-use data and the fact that consumptive use is small relative to regional groundwater fluxes. In addition, much of the water pumped for domestic use would be recharged to groundwater by septic tanks/leach fields and landscape irrigation. Please see Itasca Clarification Memo attached to the Final EIR as Appendix O.

Response to Comment Grp 7-78

The commenter asserts that the DEIR fails to account for potential decrease in groundwater recharge due to the project development. As discussed in the previous response, Sensitivity Scenario 5 decreased recharge by 50% over the entire model area. Decreasing the recharge rate over the small area where the engineered fill will be placed would be trivial in comparison to the sensitivity scenarios already performed for the analysis. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. An increase in drawdown caused by the project due to reduced groundwater recharge would be detected in the required well monitoring and well mitigation plans. Please see Response to Comment Grp 7-77.

Response to Comment Grp 7-79

The commenter asserts that the groundwater model's conclusions are flawed because the assumptions regarding surface area of the underground mine works are not accurate. However, the surface areas of mine workings or drift dimensions were not used to estimate groundwater transmissivity and therefore do not affect the assumptions of transmissivity and the overall hydrological model whatsoever.

As discussed in Section 4.4 of Appendix K.3 of the DEIR, the historical mine workings were simulated using 9,344 drain nodes, and the future mining operation was simulated with 3,888 additional drain nodes.

The reference to typical drift dimensions of 7.5ft x 8.5 ft on page 37 of Appendix K.2 of the DEIR is attributed to Amec Foster Wheeler Americas Limited. (2017). Technical Report on the Idaho-Maryland Project, Grass Valley, California, USA. Vancouver, BC. as indicated in the report.

Response to Comment Grp 7-80

The commenter asserts that the proposed new service shaft was not included in the groundwater analysis and no cone of depression is included with regard to the new shaft. However, the service shaft was included in the ground water model, and a small cone of depression is clearly shown at the proposed service shaft location on Sheet 12 of DEIR Appendix K.2 (located near the center of the Brunswick Industrial Site).

The proposed service shaft is located approximately 440 ft east of the South Fork Wolf Creek as shown in Figure 3-8 of the DEIR. The service shaft and the excavation to construct it will not be within 100 feet of the creek.

The excavation to install the service shaft is described on page 3-22 of the DEIR. The overburden (i.e., soil and weak rock) would be excavated from the surface and a concrete collar installed from the surface profile to the bedrock. The depth to bedrock is approximately 60 feet. The overburden material would be excavated to allow the shaft and concrete collar to be constructed, and then the overburden would be placed and compacted around the concrete collar to the original ground surface elevation. Any groundwater that infiltrated into the excavation during construction would

be discharged to land (and recharged into the ground) under the requirements of the Construction Stormwater Pollution Prevention Plan (C-SWPPP) required by Mitigation Measure 4.8-1(b) of the DEIR. The excavation would not lead to more groundwater drawdown, or impact near-surface groundwater, because it would be backfilled after construction.

As discussed on page 3.31 of the DEIR, a buried 48-inch culvert crosses the Brunswick Industrial Site. The culvert transports off-site surface drainage from Brunswick Road and a portion of the watershed to the east and south of the Brunswick Industrial Site. South Fork Wolf Creek originates from the outlet of this 48-inch culvert. The primary source that feeds this section of the creek is therefore not associated with groundwater nearby the service shaft area.

Response to Comment Grp 7-81

The commenter asserts that the near-surface features were not considered in the groundwater model for the DEIR; however, the historic workings of the Idaho-Maryland mine and Union Hill mine were included in the Groundwater Model as shown in Figures 1-1 and 2-3 of Appendix K.3 of the DEIR.

The paragraph the commenter refers to on page 5 of Appendix H.6 clearly refers to the Idaho Shaft. The Idaho Shaft is one of the major shafts of the historic mine and is included in the Groundwater Model.

Itasca Denver considered the location of the Empire mine workings as shown in Figure 2-2 of Appendix K.3 of the DEIR. Please see Itasca Memo attached to the Final EIR as Appendix O.

Response to Comment Grp 7-82

The commenter states that the groundwater model should assume that all areas within the mineral rights zone would be mined. However, its speculative and unreasonable to assume that economic gold mineralization exists everywhere within the mineral rights at 500 feet below surface. The mining depths analyzed in the groundwater model was based on the applicant's intended mining plan which is focused on the areas where gold mineralization was actually encountered, at depths deeper than 1,000 feet below the surface.

Itasca analyzed the impacts of new underground mining excavations based upon information provided by the applicant as shown on Figures 5-1 of Appendix K.3 and Sheet 15 of Appendix K.2. As shown in these figures, assumed mining areas are based on the projected down-dip extensions to mineralized veins historically mined. Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3. As shown in Figure 5-12 the major mining expansion studies in Scenario 6 did not result in a significant expansion in the simulated 5-foot drawdown contour versus the base case.

As stated on page 31 of Appendix K.3, it is expected that the actual mining areas will change from the modeled mining areas due to vein geometry and discoveries, which will only be known after extensive underground exploration is completed in the future. Itasca recommends that the groundwater flow model be updated periodically after dewatering commences. Updated modeling would incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates.

However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(a) requires that a projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. If the water level impact assessment showed a potential impact to wells outside of the E. Bennett area, assuming the 100% safety factor, the applicant would be required to mitigate this impact before it occurs in accordance with Mitigation Measure 4.8-2(b). The mitigation would be for properties which may be potentially impacted as determined in the projected water-level impact assessment. As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The 10% drawdown threshold of significance is extremely conservative and, in most cases, would not lower the water level below the casing of the domestic well. Therefore, well mitigation may not be required after inspection. If reduction of the water column was great enough to reduce the well's yield, a simple adjustment to the pumping system may only be required. For example, by pumping at a lessor rate over a longer duration and if necessary, installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service to a group of wells. The Well Mitigation Plan has been modified to clarify the actions that would be taken as described above.

Response to Comment Grp 7-83

The commenter asserts that the groundwater model should be run for an 80-year period rather than 65 years. The groundwater model was based on the expected mining plan during year one to year 25, and then Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario.

The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks.

As stated in the previous response the groundwater flow model would be updated periodically after dewatering commences and additional groundwater level data is collected to evaluate, dewatering impacts. New groundwater level data and updated modeling would incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates.

Information on the code MINEDW including a list of projects in which MINEDW was used for groundwater modeling is provided in the appendices of Appendix K.3 of the DEIR.

Response to Comment Grp 7-84

As stated in Section 4.0 of Appendix K.3 of the DEIR, the groundwater flow model that was constructed for this investigation utilizes the numerical code MINEDW, which was developed by Itasca (2012) to solve 3-D groundwater flow problems with an unconfined (or phreatic) surface using the finite-element method. MINEDW is a commercial software that was thoroughly reviewed by Sandia National Laboratories (Corbet et al. 1998). MINEDW has been used successfully at more than 100 mine sites located throughout the world and in diverse hydrogeologic and climatic conditions. The code has been in use for approximately 30 years, and its predictions have been validated by field data collected over many years.

Response to Comment Grp 7-85

The predicted inflow and water-level drawdown over time is provided in the report (Appendix K.3 of the DEIR).

Response to Comment Grp 7-86

Initial conditions and data inputs have already been provided throughout the report in DEIR Appendix K.3.

Response to Comment Grp 7-87

All assumptions and data used for the preparation in the simulation have been provided in DEIR Appendix K.3.

Response to Comment Grp 7-88

The commenter questions the groundwater model's assumptions regarding transmissivity and anisotropy ratios and consideration of faulting. As stated on page 15 of Appendix K.3 of the DEIR, the assignment of the anisotropy ratio of 10 was based on model calibration. As stated on page 15 of Appendix K.3, based on the model calibration, all of the geologic units were assigned an anisotropy ratio (i.e., a Kx/Kz value) of 10. The description of the model calibration is provided in Sections 4-5 and 4-6 of the report.

Faults in the mine area, 6-3 fault and Morehouse fault were modeled and included in the analysis as discussed in Appendix K.3. The Idaho fault was not modelled but is located at the lithological boundary between the Brunswick Porphyrite Block and the serpentinite unit as discussed on page 4 of the report.

As shown in Table 4-2 of the report the 6-3 and Morehouse faults are assigned hydraulic conductivity (k) significantly lower than (less permeable than) the surrounding strata in the weathered to middle zones for the base case. Therefore, the requested analysis of the commenter has already been completed. As discussed in Section 5.4 of the report, sensitivity Scenario 2 increases the K value of these faults by one order of magnitude and Scenario 3 excludes the faults from the model. The most sensitive scenario is used to estimate impacts to wells as discussed on page 80 of Appendix K.2.

Response to Comment Grp 7-89

As discussed in the previous response, the requested analysis has already been performed as the base case.

Response to Comment Grp 7-90

As stated on page 15 of Appendix K.3 of the DEIR the assignment of the anisotropy ratio of 10 was based on model calibration (see Response to Comment Grp 7-88). Therefore, modelling with different anisotropic ratios would not be appropriate.

Response to Comment Grp 7-91

The three main faults, Morehouse fault, Idaho fault, and 6-3 fault discussed in the Amec Foster Wheeler Americas Limited (2017) Technical Report on the Idaho-Maryland Project have been considered in the model as discussed in Response to Comment Grp 7-88.

Figures 7.8 and 7.9 of that report show additional lessor faults which are part of the Idaho Fault Zone as discussed in Section 7.3.1 of that report. Therefore, these faults have already been considered as part of the Idaho fault.

Figure 7-10 of that report shows several minor faults (22, 20, 11, 20C) which are coincident with veins of the Brunswick veins which are already mined and are shown not to extend towards the surface in the figure. As discussed on page 13 of Appendix K.3 of the DEIR, the minimum horizontal length of an element is about 20 to 25 ft. Therefore, the modeling of these minor faults would serve no purpose because most of this area is already modelled as mining voids. Please see Itasca Clarification Memo attached to the Final EIR as Appendix O.

Response to Comment Grp 7-92

Scenario 3 excludes the faults from the model as discussed in Response to Comment Grp 7-88. Therefore, the removal of all of the “impermeable fault wall” has already been considered in the analysis.

Response to Comment Grp 7-93

Groundwater levels are discussed in Section of 3.3.2.2 of Appendix K.2 of the DEIR. There are no references to measurable drop offs in groundwater surface topography.

Response to Comment Grp 7-94

Please see Response to Comment Grp 7-64 through Grp 7-94.

Response to Comment Grp 7-95

The commenter expresses concern regarding mine exhaust moisture affecting air traffic at the nearby Nevada County Airport. The Nevada County Airport Land Use Compatibility Plan (ALCP) provides information on policies for compatibility planning in the vicinity of the Nevada County

airport. The northern portion of the Brunswick site and New Brunswick shaft is in Zone D – Traffic Pattern Zone of the Nevada County Airport (See Map 2A of ALCP). The Federal Aviation Regulations (FAR) Part 77 Surfaces at the location of the shaft is at an elevation of 3,307 feet or higher (See Map 2B of ALCP). Objects which exceed the FAR 77 height limits constitute airspace obstructions. The top of the proposed New Brunswick shaft headframe is at an elevation of approximately 2,921 ft above mean sea level (MSL), which equates to at least 386 feet below the FAR surface.

At 200,000 cubic feet per minute (CFM), ventilation exhaust velocity at the exit of the headframe opening (approximately 14 feet by 30 feet) would be approximately 476 feet per minute (5.4 miles per hour [mph]). The velocity would quickly diminish but even at maximum velocity is less than the average wind speed at the Nevada County Airport (approximately 6 mph).

The ventilation system for the mine downcasts fresh air into the mine at the Service shaft. As the air descends, it is compressed, and this auto compression increases the air temperature. As the air travels through the mine, it gains additional heat from the natural temperature of the rock. The moisture carrying capacity of air increases with temperature and water used in the mine is absorbed by the air as it travels through the mine workings. When mine air is exhausted back to the surface at the Brunswick shaft, the auto-compression of the air reverses and the air expands and cools. The moisture carrying capacity of the air decreases and excess water released (water vapor and precipitation) as it upcasts through the shaft. The result is that exhausted air is at or near saturation point when it reaches the surface. The natural rock temperature influences the air temperature and therefore the exhausting air temperature would be fairly constant through the seasons. If the ambient air temperature is low, the mixing of the air could result in water vapor as the mine air is further cooled. This water vapor would be quickly dispersed.

The mixing of air at two different state points results in air at an intermediate state point. The new state point is a function of the flow rates of the original masses of air. Considering a column of air from the top of the headframe to the FAR (386 feet above top of headframe) at the average wind speed of 6 miles per hour (528 feet per minute), the 200,000 CFM mine exhaust would be mixed with 4,484,000 CFM of ambient air and only comprise 4.3% of the mixed air. On a calm day (1.1 mph or 0.5 m/s windspeed), the mine air would only compose 19% of the mixed air. The actual mixing would be much greater than this simple example as the column of air is dispersed and exposed to increasing mass flow of ambient air.

Due to the relatively low velocity of airflow and large amount of mixing expected between the headframe and the airport, there is no potential impact to aircraft in the traffic pattern zone of the Nevada County Airport due to the project. In certain conditions (i.e., calm and very cold days), water vapor could be visible immediately above the headframe. Complex modeling and viewpoint renderings of water vapor would not change the conclusion of the DEIR and therefore is not required for the project.

https://wind.willyweather.com/ca/nevada-county/grass-valley.html

https://www.nctc.ca.gov/documents/NCALUC/NCALUCP%20Final%209-21-11%20-%20Chapter%202%20-%20Policies.pdf

Response to Comment Grp 7-96

The commenter asserts that the DEIR should have evaluated the project's potential to activate local faults and induce seismic activity due to the removal of rock and placement of fill. However, the magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed or is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see the NV5 Memo attached as Appendix P to the Final EIR.

Response to Comment Grp 7-97

Please see Response to Comment Grp 7-96.

Response to Comment Grp 7-98

Please see Response to Comment Grp 7-96.

Response to Comment Grp 7-99

Extensive geotechnical analysis was performed for the project as evidenced by the analysis in Chapter 4.6, Geology, Soils, and Mineral Resources, of the DEIR. Please also see Response to Comment Grp 7-96.

Response to Comment Grp 7-100

Please see Response to Comment Grp 7-96. No impact to integrity of near surface historical and proposed mine works would occur from the placement of engineered fill on surface. The magnitude of the mine rock placement is far smaller than the magnitude of the mass of bedrock underlying the site where these tunnels are located.

Response to Comment Grp 7-101

The location of proposed buildings within the area of the 6-3 fault shown on the drawing provided by the commenter has already been extensively analyzed in the DEIR. Please see Section 4.6 and Appendix H.2 of the DEIR.

Response to Comment Grp 7-102

The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. Please see Response to Comment Grp 7-96. Given that the larger faults do not present geotechnical concerns, lesser faults in the mine area also do not present concerns of significance. Seismicity and faulting have been thoroughly analyzed in the DEIR. Please see Chapter 4.6 of the DEIR.

Response to Comment Grp 7-103

The commenter notes that a sampling plan for asbestos under the relevant Asbestos ATCMs has not yet be approved by the NSAQMD. However, the sampling plan does not need to be approved until rock production commences. The Asbestos ATCM for Construction, Grading, Quarrying and Surface Mine Operations and Asbestos ATCM for Surfacing is applicable to the project because a portion of the area to be disturbed is located in a geographic ultramafic rock unit. A Geological Evaluation would be required if an exemption from the ATCM's was requested. Such an exemption is not being requested.

In accordance with the ATCM for Surfacing, and the required use of ARB 435 Test Method, prior to conducting any sampling, the sampling plan shall be submitted to the Northern Sierra Air Quality Management District (NSAQMD) for approval. This is not required until the mine produces rock from the underground mine.

Response to Comment Grp 7-104

The requirements of ARB Method 435 in relation to the ATCM for Surfacing is discussed in the ASUR Plan (Appendix E.2 of the DEIR). The California Air Resources Board announced on May 18, 2017 the release of the Implementation Guidance Document for Test Method 435 Field Sampling and Laboratory Practices. This guidance document is intended to be used in conjunction with the regulation, Test Method 435, to assist laboratories, consultants, local air pollution control districts, and other asbestos stakeholders in the application and performance of M435. This non-regulatory guidance document consists of clarifications and recommendations. Notably, the guidance document contains recommendations, not requirements of ARB Method 435.

Response to Comment Grp 7-105

The ASUR Plan was authored by the applicant based on applicable regulations and sound geologic principles. The ASUR Plan is a management plan and discusses how rock will be managed (including sampling and testing) in the future during operations; however, the ASUR Plan is not a state regulatory requirement and therefore is not subject to certain licensing requirements. As such, the current licensing of the applicant's management, directors, and consultants is not relevant. However, it should also be noted that the California Air Resources Board's ATCMs that pertain to naturally occurring asbestos are the overarching regulations with which the project is required to comply, and the ASUR Plan was developed to be consistent with the ATCMs; however, the ASUR Plan does not supersede requirements contained within the ATCMs. As such, any licensing requirements in state law relating to implementation of the ATCMs will still apply to the project.

Response to Comment Grp 7-106

Asbestos by Polarized Light Microscopy (PLM) cannot be directly compared to Transmission Electron Microscopy (TEM) or Phase Contrast Microscopy (PCM) results. The OEHHA Guidelines provide a conversion of TEM structures to PCM equivalent fibers and from PCM fibers to PCM weight percent.

Response to Comment Grp 7-107

The commenter provides a description of PCM asbestos testing methods, advantages and disadvantages. As stated on page 18 of the ASUR plan, underground mining operations are obligated to comply with MSHA (Mine Safety and Health Administration) Federal Regulations. Potential asbestos fiber concentrations shall be determined by phase contrast microscopy (PCM) for compliance with MSHA regulations for worker exposure to asbestos.

As stated on page 7 of the ASUR plan, TEM is the method recommended by OEHHA. However, TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units. The public health risk assessment prepared for the project has been developed in accordance with OEHHA Guidelines.

Response to Comment Grp 7-108

The commenter provides a description of PLM asbestos testing methods, advantages and disadvantages. PLM testing is required to comply with the Asbestos ATCM for Surfacing.

Response to Comment Grp 7-109

The commenter inquires how the method for bulk sampling was modified for rock cores. The modifications and sample preparation used by the laboratory are detailed on page 89, the cover sheet for Asbestos TEM Laboratories of Appendix E.2 of the DEIR. Sample preparation followed a standard CARB 435 prep method. The entire sample was dried at 135-150 C and then crushed to ~3/8" gravel size. If the submitted sample was >~1 quart, the sample may have been split using a 1/2" riffle splitter following ASTM Method C-702-98 to reduce the sample volume for pulverization. The remaining aliquot, or entire original sample, was then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product.

Response to Comment Grp 7-110

Asbestos by Polarized Light Microscopy (PLM) cannot be directly compared to Transmission Electron Microscopy (TEM). PLM testing is required to comply with the requirements of the Asbestos ATCM for Surfacing. TEM testing is OEHHA's preferred analytical approach for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. As such, TEM testing is OEHHA's recommended approach to conduct a health risk assessment.

Response to Comment Grp 7-111

Please see Master Response 23 - Adequacy of Asbestos Sampling.

Response to Comment Grp 7-112

The commenter asserts that some samples are mislabelled in Asbestos Sample Memo June 2020 Appendix A. This report is not included in the DEIR but is referenced in the ASUR plan (Appendix E.2 of the DEIR). The photo in Appendix A is mislabeled as Y962880 instead of Y962980. This is a typo in the report and has no effect on the analysis of the DEIR. The commenter asserts that asbestos sampling was "extremely limited" and stopped drilling when asbestos was detected. Please see Master Response 23 - Adequacy of Asbestos Sampling.

Response to Comment Grp 7-113

The commenter questions why samples with different TEM weight percentages can have equivalent PCM fiber counts, and questions why duplicate samples may show different results. For the purposes of the Air Toxics Hot Spot Program, asbestos should be converted using the relationship of 1 PCM Fiber = 320 TEM structures (OEHHA Appendix C). TEM weight percent is not used and has no relevance to a health risk assessment. TEM weight percent will vary depending on the size and mass of each structure detected. Duplicate samples are taken from the same location of drill core but are not identical samples. Therefore, it is expected that there will be variations in naturally occurring asbestos fibers between samples. The commenter's conclusions regarding asbestos content are incorrect because the commenter mistakenly correlates TEM weight with PCB fiber count, which are not directly correlated.

Grouping by lithology is important as mining is planned and completed in the distinct geological units present in the mine. As the commenter notes, serpentine is a lithology of concern due to the presence of chrysotile asbestos.

Response to Comment Grp 7-114

The commenter asks why the report was revised and questions the implication of not having blind blanks or blind duplicates, along with the implication of noted grid opening damage and possible contamination. The laboratory provided their final work product which is included in the appendix of the ASUR Plan. The laboratory report NO.375516 is marked as rev.1 because the results from sample Y962992 was not included in the first version of this report. This incomplete "original" version of the laboratory report is redundant and its inclusion in the ASUR plan is not required. Grid openings damage is noted by the laboratory and is part of their internal processes. As a certified laboratory it is up to the lab to determine whether a damaged grid unacceptably impacts the accuracy of their reporting results and repeat testing if deemed necessary. Where only a single structure of asbestos is detected the laboratory notes "possible contamination". This does not affect the analysis of the DEIR other than adding additional conservatism with the assumption of asbestos that does not exist. Duplicates and blanks were not re-inserted as the 40 samples previously submitted (and analyzed by PLM) were reanalyzed using the TEM method. Blanks and duplicates were inserted into the original group of samples. However, future sampling during operations under the ASUR Plan will require a Quality Assurance Quality Control program which would require blanks and duplicate samples.

Response to Comment Grp 7-115

The commenter questions the implication of the possibility of amphibole asbestos in the rock versus chrysotile asbestos. The commenter asserts that there may be different health risks associated with different types of asbestos; however, OEHHA guidelines do not attribute different cancer risk for amphiboles and chrysotile asbestos fibers. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California, and the health risk assessment is required to be based on OEHHA guidelines.

Response to Comment Grp 7-116

The commenter asserts that the presence of certain elements in asbestos fibers may affect the toxicity of those fibers. However, OEHHA guidelines do not attribute different cancer risk based on metal content or presence of other elements. The OEHHA guidelines provide the mandatory methodology for use in health risk assessments.

Response to Comment Grp 7-117

The commenter asserts that the samples submitted for laboratory analysis of metal toxic air contaminants were "expired" because they were submitted in early 2019, but could have been drilled as early as 2017. However, rock material does not "expire" after even a few years. The analyses related to metals were conducted on native geologic material that have been present in the environment for many millions of years. The purpose of the testing was to assess the potential for actions related to the proposed project to mobilize naturally-occurring metals within the minerals in the rock. The time between collection of the rock sample and the lab analysis, and the temperature at which the rock samples were stored or transported, has no effect on the presence or mobility of the naturally occurring metals within the rock itself. As such, the hold times for the rock samples do not affect the validity of the results or the validity of the DEIR's analysis.

Response to Comment Grp 7-118

The commenter questions whether the ASUR plan's proposed method of obtaining samples complies with CARB Method 435, as the ASUR plan requires samples to be taken at the transfer point in between the skip and the silo. The commenter implies that the ASUR's method is not proper because it does not draw directly form a storage pile, conveyor belt, or aggregate covered

surface. The ASUR Plan complies with CARB Method 435, Section 5.2 of which states that "The grab samples shall be taken from the product staking belt or if this is not possible then at the first transfer point before the stockpile." Page 13 of the ASUR Plan states that "Samples will be taken from the transfer point between the skip and silo and may be taken either manually or with an automated sampler." As such, the ASUR plan complies with CARB Method 435. Moreover, the method apparently suggested by the commenter of placing all the material into a large stockpile could actually lead to greater air quality impacts. The project proposes no outdoor stockpiles, and by keeping the material in silos reduces impacts associated with any dust created by stockpiles.

Response to Comment Grp 7-119

The employee tasked with taking the sample would take the sample at the transfer point. The internal structures of the headframe, including platforms etc., are not shown on Figure 2 of the ASUR plan and are not required for the purpose of the illustration.

Response to Comment Grp 7-120

The commenter asserts that taking a sample of barren rock prior to its placement in the silo may be appropriate, but that such sampling is not appropriate for tailings because that sampling point is not the point closest to the end of processing, as the commenter asserts is required by Carb Method 435. However, the commenter has truncated its cited reference to CARB Method 435 requirements. The full text on page ii of the Implementation Guidance Document ARB Test Method 435 document states: "Choose to sample aggregates on conveyor belts closest to the final product rather than piles if at all possible."

Notably, the above sentence is a recommendation, not a requirement of ARB Method 435. The ASUR plan does not propose to sample from piles, so this recommendation is not directly applicable to the tailings. The sampling point chosen allows for testing to be completed before the material is transported for use in surfacing and is the closest sampling point that is practical to the end product for the tailings.

Response to Comment Grp 7-121

The commenter asks at what intervals the 3 samples will be taken per 1,000 tons. Sampling is at random intervals and not at set timing. As required by ARB Method 435, the method of randomly choosing the sampling locations and intervals is left up to sampling personnel but must follow the procedure specified in the sampling plan (which would be approved by NSAQMD).

Two methods of asbestos testing are required under the ASUR Plan. PLM testing is required to comply with the Asbestos ATCM for Surfacing and trucks may not transport material without a receipt based on the PLM results. Any materials with detectable asbestos would not be allowed to be used for surfacing.

The commenter also asks whether barren rock and mineralized rock would be analyzed separately. Barren rock and mineralized rock would be analyzed separately to allow the issuance of the required receipt. Barren and mineralized rock are placed in different bins of the silo.

As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. The purpose of TEM testing in the ASUR Plan is not to control the fate of the rock and tailings after it reaches surface (that is the purpose of the PLM testing described above). Rather,

the TEM testing is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project.

Response to Comment Grp 7-122

The commenter questions the purpose of the different testing methods used as part of the ASUR plan. As described below, the ASUR plan utilizes TEM and PLM testing of material, but uses each method for different purposes, as appropriate.

The ASUR includes both an Engineered Fill Placement Plan and Asbestos Inventory. The Engineered Fill Placement (EFP) Plan (Section 8.5 of the ASUR Plan) will include schedules and planned material placement locations and haul roads. The EFP Plan will be designed to ensure that Asbestos Containing Material is not used for Surfacing. The EFP Plan will designate areas which are suitable for the placement of Asbestos Containing Material and maintain an estimate of the capacity of these areas. Whether material is suitable for Surfacing is determined by PLM testing in accordance with the Asbestos ATCM for Surfacing.

The Asbestos Inventory (Section 8.3 of the ASUR Plan) is based on asbestos content, using TEM testing, which is to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project.

Response to Comment Grp 7-123

As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern for health risk impacts given that asbestos does not have established acute noncancer effects. The purpose of TEM testing in the ASUR Plan is not to control the fate of the rock and tailings after it reaches surface. The TEM testing is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project.

A new weighted average will be calculated upon the receipt of analytical results from TEM testing as described in the ASUR Plan. No material is planned to be “stored” or “maintained”. Mining will continue as normal during the two week turn-around time for TEM samples. The asbestos content mined material is managed through the measures of the ASUR plan which included exploration sampling, mine planning, and testing of materials on surface to monitor and ensure the effectiveness of these measures.

The commenter provides a theoretical example of a sample which has no detectable asbestos by PLM (and therefore suitable for use in Surfacing) but has detectable asbestos by TEM testing. A sample which has detectable asbestos does not “fail” as the commenter asserts. Rather the measures of the ASUR Plan fail if the rolling three-month weighted average of materials brought to surface exceeds 0.01% asbestos in equivalent PCM units. The ASUR Plan describes measures which prevent such a failure from occurring and also actions that would be taken if such a failure did occur. The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials. Samples would not be re-tested as individual samples do not “fail” as discussed above.

Response to Comment Grp 7-124

The commenter asks how the 500 tons of material designated for cemented paste fill will be selected, and how it will be culled from the inventory. The amount of cemented paste fill poured underground is estimated to average 500 tons per day, but will vary based on operational

considerations and availability of mine voids underground. The selection of which materials are used for backfill is determined by technical and management personnel of the operation. The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials.

Response to Comment Grp 7-125

No large-scale temporary storage facilities are proposed for the project. The project includes temporary storage of materials at the Brunswick Shaft, inside the process plant, and at the Brunswick and Centennial sites where material would be dropped by trucks and later graded and compacted during weekday daylight hours. Toxic air contaminant fractions within particulate matter have been estimated based on these material processes and were already incorporated into the Health Risk Assessment.

Response to Comment Grp 7-126

The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials.

Response to Comment Grp 7-127

The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials. Accordingly, the rock truck loading building is not designed to hold inventory of rock. Rather the inventory of rock is held in the silo until loaded into trucks.

Response to Comment Grp 7-128

No trucking is allowed during nighttime hours (8 hours of the day). During this overnight period the sand tailings produced from mineral processing are stockpiled inside the process plant building. This material must be loaded into trucks by a front-end loader outside of the process plant building the following day.

Response to Comment Grp 7-129

Sand tailings will be stored inside the process plant building overnight, but will be loaded into trucks by a front-end loader outside of that building. The loader loads its bucket from a stockpile located inside the building and loads the waiting truck outside of the building. The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials. Accordingly, there would be no changes to the loading procedures due to inventory issues that would affect the noise or air quality impacts. Noise from this equipment has been analyzed in the DEIR. Additionally, asbestos health risk is associated with long-term exposure and correlates to the average asbestos content of all mined materials. Given that asbestos is not an acute toxin, “decontamination” of the equipment is not necessary nor required for the project. Rather, changes in the mine plan would be developed to prevent and respond to any higher than anticipated asbestos content as disclosed by TEM testing. The Health Risk assessment assumes average asbestos content of all dust at 0.01% weight percent asbestos in PCM equivalent units. The potential for equipment and storage areas to generate dust is included in the analysis which has determined the risk to the public from this dust to be less than significant after mitigation.

Engineered fill (barren rock and sand tailings) are kept separate in the process plant and in trucks delivering the materials to their destination. Once they are used for engineered fill at the destinations they would be blended as necessary for geotechnical criteria and operational

planning. As discussed on page 14 of Appendix H.1 of the DEIR, laboratory testing of selective ratio of blended materials would be conducted to verify geotechnical parameters. Nuclear density gauges or procedural test methods would be used to verify compaction reached required densities as appropriate.

Response to Comment Grp 7-130

Shotcreting of wall for asbestos mitigation is contemplated in Section 6.1 of the ASUR Plan when planned tunneling in Barren rock is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass of equivalent PCM units. This situation is not expected based on the percentage of asbestos encountered in samples obtained from the project site; however, in such an unlikely situation, the entire tunnel project would be considered to contain significant asbestos. The greenhouse gas from the manufacturing of cement is not attributable to the project for analysis of GHG emissions in the DEIR analysis. The use of shotcrete is expected to be minor and any transport of this material is accounted for in the freight trucks already included in the air quality analysis. Shotcrete application is a wet process and generates minimal dust. Hexavalent chromium could be present in cement but would not be mobile once shotcrete is cured, similar to any concrete product. The use of shotcrete would be trivial in comparison to the mass of cement used in cemented paste backfill.

Response to Comment Grp 7-131

The commenter asks whether shotcrete will be used in all tunnels. Shotcrete is used as ground support in certain situations where rock bolts and screens are not sufficient. In construction of most new underground works shotcrete is not expected to be required based on the solid character of the rock encountered during drilling.

Response to Comment Grp 7-132

The commenter asks whether and how asbestos will be removed from mine water and how much volume of water may be contaminated with asbestos. Note that the word “sediments” is missing from the sentence in the ASUR Plan that is cited by commenter. This is an editing error in the document.

The corrected sentence should read:

> “Water generated from drilling and dust suppression during tunneling in Asbestos Containing Material shall be collected in sumps or tanks and sediments shall not be used for Surfacing.”

Contrary to commenter’s implication, there is no separate water process for asbestos containing water, as all water pumped from the mine will follow the same treatment path, which involves removal of solids. Sumps or tanks used in the underground mine are designed to remove the majority of solids from the water. The water would then be pumped to main underground sumps located on various levels, then to the surface water treatment pond. Solids would be removed from water at all these stages. Under the requirements of Order R5-2022-006 the final discharge must have less than 10 ppm total suspended solids (Average monthly) and 7MFL (million fibers per liter) asbestos in water. Accordingly, any water discharged from the project will have been treated at multiple stages and will be required to comply with RWQCB standards for numerous constituents, as well as asbestos content.

Response to Comment Grp 7-133

The commenter asks whether the MERV 16 filters will be limited to serpentinite mining only, what type of filters are used in the main ventilation system, and what is the quantity of asbestos in the total mined quantity of serpentinite. No filtration is proposed in the main ventilation system. Air filtration is contemplated in Section 6.1 of the ASUR Plan when planned tunnelling in Barren rock is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass of equivalent PCM units. Asbestos emissions are controlled by utilizing dust collection (air filtration).

The filtration measures in Section 6.1 of the ASUR Plan ensure that asbestos emissions that flow into the mine ventilation system are not increased beyond the baseline scenario (with all mined material averaging 0.01% PCM equivalent asbestos content). Therefore, the assumed ratio of serpentinite in barren rock is not relevant to the health risk assessment.

For example, serpentinite sample Y962992 (Appendix C of the ASUR Plan) contains the highest content of asbestos from exploration sampling with 7.3 TEM structures per nanogram or 0.069% PCM equivalent weight percent. The dust generated from each activity would be reduced by 95% by air filtration before entering the main ventilation system and exhausting to surface. The dust emission factor (EF) for the activity remains constant.

Serpentinite sample Y62992 with filtration
Asbestos dust per ton mined = 0.069% x EF x 5% = 0.0035% x EF

Maximum ASUR asbestos content without filtration
Asbestos dust per ton mined = 0.01% x EF = 0.0100% x EF

Page 300 of the Air Quality Technical Report refers to existing mine fill at the Brunswick site which will be disturbed during site construction and assumes a conservative serpentinite content for the purpose of the health assessment due to limited testing in this area. The Health Risk Assessment assumes the maximum asbestos content possible under the ASUR Plan for mining materials derived from proposed underground mining.

The commenter also asked how the mine fill can be 14% serpentinite if only 1% of mined material is serpentinite. Contrary to the commenter's statement, engineered fill was not assumed to have 14.3% serpentinite; rather, the existing mine fill at the Brunswick site was assumed to have 14.3% serpentinite. As discussed on page 300 of the Air Quality Technical Report, existing mine fill at the Brunswick site will be disturbed during site construction and the report assumes a conservative serpentinite content for the purpose of the Health Risk Assessment due to limited testing in this area. Based on the overall serpentinite content found in the rock underlying the site, and the testing on the existing fill material, the 14.3% assumption likely overstates the serpentinite in the existing fill. For material that will be mined at the site as part of the project and brought to the surface, the Health Risk Assessment assumes the maximum asbestos content possible under the ASUR Plan for mining materials derived from proposed underground mining.

Response to Comment Grp 7-134

Based on cited language from the ASUR Plan, the commenter asks why the mine operator would remove barren rock surrounding mineralization if it is not going to mine the gold mineralization. Gold mineralization is treated differently than barren rock in Section 6.0 of the ASUR Plan (Mine Planning) because the gold mineralization must be crushed, hoisted to surface, and processed.

These activities could generate significant dust which could be harmful if the materials contained significant asbestos. As such, if identified gold mineralization contains sufficiently high asbestos content such that its mining would cause the 3-month rolling asbestos inventory average to exceed 0.01% asbestos by mass of PCM equivalent units, that gold mineralization would need to be avoided. Conversely, engineering controls for tunneling in barren rock can be more easily implemented and the material could remain underground. As described on page 3-19 of the DEIR, new underground tunnels and raises would be created as necessary to access gold-quartz veins or provide the necessary underground infrastructure to transport rock and provide ventilation and escape routes. As such, the mine operator may need to mine through barren rock to reach other target areas, even if certain gold mineralization is avoided.

Response to Comment Grp 7-135

The commenter requests that the mine operator be required to maintain records of asbestos content in mined material indefinitely. The ASUR Plan is intended to reflect the requirements of the ATCM's which are attached to the ASUR plan.

Section (e)(5)(A) of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations requires the maintenance of certain records (including air monitoring) for 7 years following the completion of construction or grading operations. Section (f)(5)(A) of the ATCM requires the owner/operator of a surface mining or quarrying operation to maintain certain records (including air monitoring) for at least 7 years.

Section (e) of the Asbestos ACTM for Surfacing requires receipts (verifying the asbestos content) to be retained for a minimum period of seven years from the date of supply or use of the material. As such, there is no legal requirement to keep records beyond 7 years, and there is no environmental impact associated with not maintaining these records indefinitely.

Response to Comment Grp 7-136

The ASUR plan is part of the project description and will be required by the County pursuant to a condition of approval. As such, the ASUR Plan will be binding on any successors in interest to the mine. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP. Accordingly, the ADMP is the tool used by the NSAQMD for enforcement, rather than the ASUR plan. Nonetheless, the ASUR plan is binding on the applicant, can be enforced by the County, and to the extent that provisions in the ASUR plan are incorporated into the ADMP, those provisions would be enforceable by the NSAQMD.

Response to Comment Grp 7-137

The commenter asserts that the 3-month rolling inventory will cause increased fugitive dust emissions; however, the commenter misunderstands the rolling inventory and seems to believe that it is a physical stockpile of 3-months of mined material. The rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials. The project site is not designed to hold 3-months of mined material in inventory and will not do so.

The commenter also asks whether all material can be properly assumed to contain only 0.01% asbestos for purposes of calculating air emissions. The assumption that all mined rock will average 0.01% is appropriate and the Health Risk Assessment' analysis of asbestos-related health risk is based on conservative assumptions. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.

The commenter also states that qualification of asbestos content is not possible until after testing by TEM occurs, which may not be known for two weeks, resulting in unknown impacts to the public. This is not an accurate statement; as discussed in Section 6.0 of the ASUR Plan asbestos content is determined by TEM during the exploration and pre-mining phase before mining is commenced. The TEM sampling conducted on materials (barren rock and sand tailings) at surface is done to verify that mine exploration and planning is successfully minimizing the content of asbestos in mined materials brought to surface. Therefore, the TEM testing is done on samples prior to actual mining to improve mine planning and avoid impacts.

As stated on page 4.3-42 of the DEIR, the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA are consistent with what are used for the AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concluded that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the EIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Grp 7-138

The commenter notes that the HRA prepared for the project uses a 30-year exposure timeframe, and asks what health impacts will occur after that 30-year period. As stated on page 26 of the Health Risk Assessment (Appendix E.1 of the DEIR), OEHHA describes cancer risk evaluations for 9-, 30-, and 70-year exposure durations in the 2015 OEHHA Guidelines and identifies that the 9- and 30-year durations correspond to the average and high-end of residency time

recommended by the EPA, with the 30-year exposure duration recommended for use as the basis for estimating cancer risk at the maximally exposed individual resident in all HRAs. OEHHA recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident (MEIR) in the Hot Spots Program. This exposure duration represents the time of residency for 90 to 95% of Californians at a single location and should provide adequate public health protection against individual risk. (Section 8.1 OEHHA 2015 Air Toxics Hot Spots Program Manual). As standard practice, the duration of exposure is based on 30-year sensitive receptor residency rather than the life of a project.

Further, additional conservatism is layered into OEHHA's recommendations that were incorporated into the HRA prepared for the project, including the assumption that exposure at all sensitive residential receptors would begin in the 3rd trimester of gestation, which accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs), and that the baby grow through childhood and adulthood at the same home for the next 30 years. This scenario is unlikely to happen, yet it evaluates and reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations.

Response to Comment Grp 7-139

The commenter questions the use of meteorological data in the HRA. Please see Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Grp 7-140

The attainment status of Nevada County is discussed on page 4.3-9 and shown in Table 4.3-3 of the DEIR. Western Nevada county is in attainment for PM2.5 and non-attainment for PM10. Ambient Air Quality Standards are determined by the US and California EPA and not the World Health Organization.

As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. The NSAQMD thresholds of significance for PM10 and PM2.5 do not consider baseline measurements, so the commenter's request for baseline measurements is not relevant to the significance analysis in the DEIR.

Regarding the health risk assessment, the threshold of significance for exposure to toxic air contaminants is based on an incremental increase in cancer and non-cancer risk associated with a project. As such, the baseline concentration does not factor into this impact determination.

Response to Comment Grp 7-141

The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the DEIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Response to Comment Grp 7-142

The commenter questions the 30-year exposure duration assumption versus the 80-year project life. Please see Response to Comment Grp 7-138 above.

Response to Comment Grp 7-143

Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Response to Comment Grp 7-144

The commenter asks about air quality health impacts to the Durham School Bus Depot. As discussed in Section 2.1 of the Health Risk Assessment, the cancer risk accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs). Accordingly, the HRA evaluates and reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations.

As stated on page 27 of the Health Risk Assessment (Appendix E.1 of the DEIR), the maximally exposed individual residence (MEIR) would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Given that the Health Risk Assessment presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project, including the Durham Bus Depot, would have less exposure and consequently less potential health risk than the MEIR.

Response to Comment Grp 7-145

The commenter requests that the demographics of the community, including age and specific illness rates, be considered in the health risk analysis.

Health risk assessments do not account for County-specific illness rates. However, as discussed in Section 2.1 of the Health Risk Assessment for the project, implementing the OEHHA Guidance, as was done for the project, reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations. For example, the reference exposure levels (RELs) used in the evaluation of non-cancer risk are designed to protect the most sensitive individuals in the population, including infants and children, by selecting appropriate toxicological data and including margins of safety. Accordingly, the evaluation methods are assumed to protect children and other sensitive subpopulations (groups of more highly susceptible individuals) from adverse health effects in the event of exposure. A similar approach was taken for cancer risk, which accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs), as well as conservative exposure period, fraction of time at home, and cancer potency factors as recommended by OEHHA.

Sensitive receptors, including the facilities mentioned by the commenter, are at a further distance than receptors around the sites and would have less exposure and consequently less potential health risk than the MEIR. Please see Response to Comment Grp 7-144.

Response to Comment Grp 7-146

The commenter asserts that there is an error in the AERMOD dispersion model, which would indicate the model was run at the wrong elevation. The Base Elevation for STCK8, STCK9, STCK10 shown in Table 2 are in feet. The units shown as meters is an error (typo) in the table. This can be verified in the model output files on page 395 of the document where these stacks are shown at elevations of 837.71, 838.72, and 759.39 meters. As such, the AERMOD dispersion model was run at the correct elevations.

Response to Comment Grp 7-147

No fuel monitoring or other provisions in regard to the backup generator are proposed or required to be analyzed in the DEIR. As stated on page 58 of Appendix E.1, the Stationary Engine ATCM allows owners and operators of emergency standby engines to use those engines to provide electrical power when a facility experiences the loss of normal electrical service that is beyond the reasonable control of the facility. Electrical service loss resulting from Public Safety Power Shutoff events is beyond the reasonable control of back-up engine owners and operators, and therefore, appropriately permitted emergency standby engines may be operated to provide electrical power during such an event pursuant to the Stationary Engine ATCM. Mitigation for emissions from generator use during power outages is not required because such use is speculative, and it is uncertain if or when such use would occur. Emissions from routine testing of these generators has been included in the emissions of the project.

The commenter asks if there will be penalties if the Teir4F engines are not used exclusively due to “commercial availability” status. Tier 4F generators are commercially available, and therefore will be required to be used for the project. As stated on Page 4.3-49 of the EIR, a representative Cummins model QSK60-G17 generator with a Tier 4F engine was used for emission factors.

Response to Comment Grp 7-148

The commenter expresses concern regarding silica exposure, and asserts that the Health Risk Assessment underestimates silica content in the rock that will be mined as part of the project. The assumed crystalline silica content and modeling of respirable silica in the Health Risk Assessment prepared for the project is conservative and overestimates the relevant exposure in any situation, as described in Master Response 21 – Conservatism of Silica Assumptions. Given that the Health Risk Assessment uses the most conservative assumptions regarding silica content and exposure, sampling of materials for crystalline silica content is not required.

Response to Comment Grp 7-149

The commenter questions why mine fill was analyzed at 14.3% serpentinite, when the DEIR assumed that only 1% of the mined material will be serpentinite. Contrary to the commenter’s statement, engineered fill was not assumed to have 14.3% serpentinite; rather, the existing mine fill at the Brunswick site was assumed to have 14.3% serpentinite. As discussed on page 300 of the Air Quality Technical Report, existing mine fill at the Brunswick site will be disturbed during site construction and the report assumes a conservative serpentinite content for the purpose of the Health Risk Assessment due to limited testing in this area. Based on the overall serpentinite content found in the rock underlying the site, and the testing on the existing fill material, the 14.3% assumption likely overstates the serpentinite in the existing fill. For material that will be mined at the site as part of the project and brought to the surface, the Health Risk Assessment assumes the maximum asbestos content possible under the ASUR Plan for mining materials derived from proposed underground mining.

Response to Comment Grp 7-150

The commenter seems to imply that the rolling inventory is a physical inventory; however, the rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials.

The commenter asserts that the detection limit of PCM equivalent units is 0.01%. However, the detection limit for TEM testing is one structure located within the number of grids scanned. Depending on how many grids are scanned the detection limit would range from approximately 0.0003% to 0.0011% PCM Weight equivalent.

Two methods of asbestos testing are required under the ASUR Plan. PLM testing is required to comply with the Asbestos ATCM. TEM testing is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. Please see Response to Comment Grp 7-121.

Drilling was stopped when the exploration geologist determined there was little potential for discovery of gold mineralization and not when asbestos was detected. Asbestos sampling is not done at the same time as drilling and cannot be detected visually at the low levels present without sophisticated microscopy.

Samples from various lithologies at the Idaho-Maryland Mine Project were selected for asbestos testing. Sampling was based on lithologies where mining could take place and not on percentages of drill holes completed during exploration. Please see Responses to Comments 7-111 and 7-112. The location of exploration samples tested for asbestos are shown on sheets 1-3 of the ASUR Plan, sample name, drill hole, downhole depths, sample interval, rock type, and test results are provided in the appendix of the ASUR Plan (Appendix E.2 of the DEIR).

Prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR).

The commenter states that twenty percent of the samples tested had asbestos levels greater than 0.01% PCM equivalents. However, this ratio has no relevance as the sampling results for asbestos content grouped by rock lithology and the quantities of each lithology mined are what will determine the potential quantity of asbestos exposure from dust generated by mining activities.

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements

as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

The commenter asserts that the asbestos emissions should not be assumed to be only 0.01% because the applicant cannot control the amount of asbestos in the actual mined material. The commenter is incorrect. As discussed in the ASUR plan the applicant can control the amount of asbestos in actual mined material through exploration, sampling, and mine planning. This sampling is completed before mining of this material and any problematic materials would either not be mined or mined using measures discussed in the ASUR Plan. The ASUR Plan provides specific measures to ensure average asbestos content does not exceed 0.01% PCM equivalent.

Response to Comment Grp 7-151

The commenter asks how much asbestos will be in the remaining 5% of asbestos fibers after use of MERV filters for situations where serpentinite would be mined. The amount of asbestos released during serpentinite mining would be the same as during mining of non-serpentinite mining through the use of measures outlined in the ASUR plan. The filtration measures in Section 6.1 of the ASUR Plan ensure that asbestos emissions into the mine ventilation system are not increased beyond the baseline scenario (with all mined material averaging 0.01% PCM equivalent asbestos content). Please see Response to Comment Grp 7-133.

Response to Comment Grp 7-152

The commenter implies that there will be asbestos emissions associated with stockpiling of the rolling inventory, and that these emissions were not analyzed. However, the rolling inventory in the Asbestos Inventory (Section 8.3 of the ASUR Plan) is a digital accounting of asbestos sample results. It does not refer to a physical inventory of mined materials.

The commenter states that the DEIR underestimates the level of asbestos exposure that could be caused by the project. However, the Health Risk Assessment is based on conservative assumptions that likely overestimate asbestos exposure. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.

As stated on page 4.3-42 of the DEIR, use of the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than

significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Grp 7-153

The commenter asserts that the samples submitted for laboratory analysis of metal toxic air contaminants were "expired" because they submitted in early 2019, but could have been drilled as early as 2017. However, rock material does not "expire" after even a few years. The analyses related to metals were conducted on native geologic material that have been present in the environment for literally many millions of years. The purpose of the testing was to assess the potential for actions related to the proposed project to mobilize naturally-occurring metals within the minerals in the rock. The time between collection of the rock sample and the lab analysis, and the temperature at which the rock samples were stored or transported, has no effect on the presence or mobility of the naturally occurring metals within the rock itself. As such, the hold times for the rock samples do not affect the validity of the results or the validity of the DEIR's analysis. Metal content in dust generated by all activities of the project were evaluated in the Health Risk Assessment. Please see also Master Response 20 – Conservatism used for Metals Assumptions.

Response to Comment Grp 7-154

The comment generally asserts that the health risk assessment is not valid. The commenter's specific comments are addressed in the preceding responses to comments. The County acknowledges the comment and notes it expresses the opinions of the commenter. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Response to Comment Grp 7-155

The commenter describes the drilling program used by Rise to explore the geology beneath the project site. However, the sampling pattern described by the commenter is not accurate. Page 96 of Appendix K.2 states:

> Rise completed 19 drill exploration drill core holes, totaling 67,500 linear feet, from 2017-2019. Exploration drilling was designed to test a variety of mineralization throughput the deposit in areas where mining is expected to occur. Drill core was logged by company geologists in Grass Valley. The core was sawed in half in zones of interest and sent to ALS Laboratories in Reno, Nevada to be assayed.

The drill logs are not necessary for the analysis conducted in Appendix K.2.

Response to Comment Grp 7-156

The commenter asked whether the sample material submitted for laboratory testing was 2mm material or 6mm material. As stated on page 98 of Appendix K.2 the material was -2mm. During crushing not all material is less than 2 mm as all crushing procedures specify a percent passing 2 mm. Therefore, some portion of the material would be larger than 2 mm. The metallurgical lab noted the material "appeared to be approximately 6 mm in size". They did not state that they measured the particle size.

Sample locations and depth intervals of the 76 mineralized samples used for the metallurgical composite sample are shown on sheets 5, 6, and 7 of Appendix K.2 (noted in Section 4.4.2 of the report).

Response to Comment Grp 7-157

The commenter provides a description of the selection process for rock samples that were selected to be representative of the barren rock surrounding the mineralized zones and then tested in a laboratory. The commenter implies that the amount of rock tested was of an insufficient volume compared to the total amount of cores collected. As discussed in Section 2.3 of Appendix K.2, an extensive network of underground workings would be constructed throughout the life of the mine to access the gold ore. These underground workings would be constructed within nonmineralized "barren" rock. The barren rock would be used as engineered fill after it is removed from the mine. The barren rock samples used for the geochemical evaluation presented in Section 4.4 of Appendix K.2 were collected to obtain data regarding the general geochemical character of the different geologic formations that would be encountered during mining. The samples were collected by a California-licensed professional geologist with experience in mining to be representative of the individual rock types that make up the barren rock (meta-andesite, altered meta-andesite, diabase, and serpentinite). Each rock type is composed of a relatively uniform lithologic material that formed from a common source. Thus, the general geochemistry of each barren rock type does not vary substantially because it all has a common source and has not been mineralized.

The overall purpose of the barren rock sampling and laboratory analysis was to identify the general characteristics of that specific material type. Given that the objective was to understand the general character of the barren rock, the number of samples or the length of the samples compared to the total linear feet of core drilled for mineral exploration has no relevance. As the samples were selected by a California licensed geologist to be representative of the mineral types expected in the barren rock, the results of the barren rock testing provide reliable and representative results for consideration in the DEIR and for assessment of the potential effects of the use of that material for engineered fill.

Furthermore, prior to mining, the applicant will need to obtain several approvals from the Central Valley Regional Water Quality Control Board (RWQCB), which will require further testing of the rock at the project site. As described in the April 4, 2022 comment letter from the RWQCB, additional laboratory studies will be required to characterize the waste materials as part of a Report of Waste Discharge. The RWQCB cannot issue permits for the placement of engineered fill unless the testing that is part of the Report of Waste Discharge clearly demonstrates that use of the barren rock for engineered fill will not violate water quality standards or conflict with the Water Quality Control Plan. The barren rock testing that was conducted in support of the project application and used in the DEIR provides evidence of the potential water quality effects that might occur due to the use barren rock as engineered fill, while the RWQCB permits, which are a requirement of the project because mining cannot occur until such permits are issued, ensure that water quality standards will be met. Please see Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 7-158

The commenter implies that the amount of core samples submitted for metals analysis is insufficient because samples were drawn from 5 of the 19 cores that were drilled as part of

exploration. Note that the table cited by the commenter, Table 4-9, is located on pages 104 and 105 of Appendix K.2 and not pages 101-102 as stated by the commenter.

As stated on page 98 of Appendix K.2, in addition to the barren rock samples, Rise provided 48 crushed core samples for trace element test work. The 48 samples were unused portions of samples crushed to 2 mm in size (referred to as assay rejects). This material provides additional information on the variability of trace metals that may be present in the rock that would be produced from tunneling in barren rock in different lithologies. All sample locations are shown on Sheets 5, 6, and 7 of Appendix K.2.

The purpose of this sampling is to provide information on materials that may be present in various rock types that would be produced from tunneling, so that the DEIR can properly analyze any impacts from those materials. The areas where tunneling is anticipated to take place are shown on Sheet 15 of Appendix K.2. The purpose of the sampling is not to sample every drill hole and the full lengths of each drill holes (which may be drilled thousands of feet before reaching an exploration target). Rather, samples were taken that are representative of where mining is actually expected to take place, and the types of rock present in those zones, not the thousands of feet of rock that was drilled just to reach the target area. Therefore, the number of samples or the length of the samples compared to the total linear feet of core drilled for mineral exploration has no relevance to whether the samples are representative of the barren rock. The 48 samples were portions of the samples (referred to as assay rejects) remaining from exploration conducted by the applicant and therefore the details on sample weights and assay procedures used to generate the rejects are not included in Appendix K.2. The samples were selected by a professional California-licensed geologist to be of adequate quantity and quality sufficient to represent the barren rock.

Response to Comment Grp 7-159

As noted by Itasca in the Cemented Paste Backfill study: Samples were analyzed using a strong-acid digestion (EPA 1996) conducted by ACZ. This method is not intended to be a total digestion; however, it is a very strong acid digestion that will dissolve almost all elements that could potentially become environmentally available (E PA. 1996. Method 3050B acid digestion of sediments, sludges, and soils. In Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846. Environmental Protection Agency, December.)

ACZ laboratories received 47 pulverized samples, (the Barren Rock Crushed Core Samples) which were split from materials previously assayed at ALS Labs. The reference to 48 samples in the Hydrology Technical Report is an error. The 47 pulps from various barren rock lithologies were run for metals content only using ICP-MS. This material provides information on the variability of trace metals that may be present in the rock that would be produced from tunneling in barren rock in different lithologies.

The 6 barren rock samples submitted to ACZ for metals, DI-Wet and acid potential were crushed and pulverized in accordance with EPA method EPA-600/2-78-054 3.1.3 as noted in the ACZ analytical reports contained in the appendix of the Hydrology Technical Report. The samples were analyzed for Total Metals, dissolved metals using California Waste Extraction Testing (WET), and acid potential (ABA) at ACZ.

It is unclear what the commenter means in the statement "Any conclusions comparing metals content, leachate capacity, ABA, etc. between pulp results and barren rock results is moot since the sample preparation (pulverization) is identical."

The crushed core samples were not subject to WET or ABA testwork and no comparisons were made to the barren rock sample results (which were subjected to these tests).

The crushed core samples and barren rock samples were analyzed for total metals using the same method and at the same laboratory.

Response to Comment Grp 7-160

The commenter questions how the composite sample was prepared and analyzed months before the individual samples were submitted to ACZ. The commenter refers to the composite sample which was used by McClelland Labs to prepare tailings samples F1-F4. As stated on page 98 of Appendix K.2, the composite sample was prepared from 76 samples of -2mm material remaining from assaying (for gold) during exploration. This exploration took place before the barren rock samples were taken to support the analysis presented in Appendix K.2, which explains why the composite sample was prepared before the individual samples.

As stated on page 98 of Appendix K.2, the applicant's geologist selected mineralized samples for metallurgical testwork by reviewing drill logs and maps. A composite sample was prepared from 76 samples of the -2mm material remaining from assaying. A portion of the material from each sample was weighed to represent the interval length and merged to make the metallurgical sample. Sufficient material was available for most samples, except for five samples where no material was available from the assay lab. The 76 samples were unused sample material (referred to as assay rejects) remaining from exploration conducted by the applicant and therefore chain of custody reports are not included in Appendix K.2.

Response to Comment Grp 7-161

As discussed in Section 4.4.2 of the Hydrology Technical Report (Appendix K.2):

> Rise selected mineralized samples for metallurgical testwork by reviewing drill logs and maps. Samples were selected to be representative of materials expected to be encountered during future mining. Factors considered in selection were gold grades, minimum mining widths, mineralization style, and locations throughout the potential mining areas. Sample locations and depth intervals are shown on Sheets 5, 6, and 7.
>
> A composite sample was prepared from 76 samples of the -2mm material remaining from assaying. A portion of the material from each sample was weighed to represent the interval length and merged to make the metallurgical sample. Sufficient material was available for most samples, except for five samples where no material was available from the assay lab. The 76 samples created a composite metallurgical sample of approximately 46 kilograms (kg) (about 100 pounds).
>
> The 46 kg metallurgical sample was shipped (in a bucket) in July 2019 to McClelland Laboratories in Reno, Nevada for testwork.

The environmental testwork on tailings samples F1-F4 were completed as discussed in 4.4.2 of Appendix K.2. As stated in Section 4.4.1, a California-licensed Professional Geologist from Benchmark Resources collected six drill core samples in Grass Valley on October 29, 2019 from

barren rock intervals. These were the barren rock samples used for the geochemical characterization discussed in this section of the report.

Response to Comment Grp 7-162

The cores were drilled for mineral exploration purposes such that the number of cores drilled and the length of a certain rock type in each core has no bearing on the amount of barren rock or tailings that may be produced from the mine. The cores were also drilled through thousands of feet of rock that will not be subject to any mining, in order to reach the target zone. Testing of the full length of these cores would misrepresent the type of rock likely to be encountered during mining. The laboratory testing was conducted to identify the general geochemical parameters of each individual rock type or formation. Please see Responses to Comments Grp 7-157 and Grp 7-158.

Response to Comment Grp 7-163

The commenter generally asserts that not enough samples were analyzed for metals content, and states that only one sample was analyzed from the Brunswick area. See Responses to Comments Grp 7-157 and Grp 7-158 regarding the adequacy of the sampling volume. As shown on Sheets 5-7 of the Hydrology Technical Report (Appendix K.2 of the DEIR), the Brunswick mine is hosted in meta-andesite. Numerous meta-andesite samples were submitted for laboratory testing.

Further mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and obtain approved Waste Discharge Requirements (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). Please see Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 7-164

The commenter asserts that there are issues with the chains of custody for rock samples, and that the samples were drawn from too few of the cores. Chain of Custody forms are presented within the laboratory reports that are part of the appendices to the Appendix K.2 report. These include the submission of the barren rock and tailings samples to ACZ labs which were used for the WET testing that is relevant to the analysis. Some of the exploration testing was not used as part of the evaluations in the Appendix K.2 report and was conducted by the applicant during mineral exploration. As such, sample collection, lab results, and Chain of Custody forms related to that work was not addressed in Appendix K.2.

The selection of samples was done in order to be representative of the rock in which mining will take place, not representative of the full length of each core. Please see Responses to Comments Grp 7-157 and Grp 7-158. The applicant's exploration work was conducted under the supervision of qualified geologist, using a quality control program, and analytical work completed at a professional laboratory, as noted in the disclosure of explorations results published by the applicant. (see below)

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)).

During this process, a sampling plan that addresses representative sampling of the mining waste would be submitted to the CVRQCB prior to sampling and the CVRQCB would to be notified when the samples are to be collected so that they may observe the process. Collection of field samples and subsequent testing of the expected mining waste would be based on clearly defined objectives identified in a sampling plan prepared by professional(s) registered to practice in California in the field of engineering or geological sciences.

https://www.risegoldcorp.com/uploads/content/Mar19RiseGoldIntersects90gptgoldover4.3metersatIdahoMaryland.pdf

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https://www.risegoldcorp.com/uploads/content/Sep4RiseProvidesExplorationUpdateforIdahoMarylandGoldProject.pdf

https://www.risegoldcorp.com/uploads/content/Aug7RiseIntersectsHighGradeGoldover1kmbelowIdahoMarylandMine.pdf

https://www.risegoldcorp.com/uploads/content/JULY23RISEINTERSECTS22GPTGOLDOVER5METERSATBRUNSWICK.pdf

https://www.risegoldcorp.com/uploads/content/JAN3INTERSECTSHIGHGRADEGOLDONBRUNSWICK1VEIN.pdf

Response to Comment Grp 7-165

The lithology between these samples is meta-andesite as shown on Sheet 7 of Appendix K.2. The serpentinite begins near the location of sample S-1 and is interpreted to be several thousand feet wide in that region as shown on Sheet 7.

Response to Comment Grp 7-166

These samples are taken at the contact of the meta-andesite and serpentinite unit as shown on Sheet 7 of Appendix K.2. Downhole or “below” theses samples is serpentinite as is shown on Sheet 7.

Response to Comment Grp 7-167

The page 510 referenced in the comment seems to be incorrect. The page discussed in the comment seems to be on page 667 of the Hydrology Technical Report pdf. (page 17/21 ACZ Analytical Report project number L57125.

ACZ Laboratories holds certification from the State of Nevada for acid-base accounting methods. Nevada is currently the only state agency offering this certification. https://acz.com/index.php/geochemistry/ The lack of California certification for these methods, cited by the commenter, is not relevant as California does not offer certifications for these methods.

Response to Comment Grp 7-168

The assumed crystalline silica content and modelling of respirable silica is conservative and overestimates the relevant exposure in any situation. Therefore, sampling of materials for crystalline silica content is not required. Please see Master Response 21 – Conservatism of Silica Assumptions.

Response to Comment Grp 7-169

The commenter questioned why drilling ceased when serpentinite was encountered. Drilling was stopped when the exploration geologist determined there was little potential for discovery of gold mineralization. Serpentinite is a poor host rock for gold mineralization and holes which encounter it are not continued in this lithology. Mining activity will not be focused in the serpentinite areas, and will attempt to avoid those areas, as there is little or no gold there. Asbestos sampling is not done at the same time as drilling and cannot be detected visually at the low levels present without sophisticated microscopy. Please see Responses to Comments Grp 7-157 and Grp 7-158 regarding volume of sampling and representation of rock types.

The commenter implies that more than 1% serpentinite will be mined because quartz veins run along contact points with serpentinite. Gold mineralization at the contact of meta-andesite and serpentinite are typically hosted in ankerite. Ankeritized serpentinite has negligible asbestos content due to the alteration of minerals that occurs during mineralization (See ASUR Plan - Appendix E.2). Maps showing lithological units and exploration drilling is provided in Sheets 4-7 in Appendix K.2.

The commenter questions why mine fill was analyzed at 14.3% serpentinite, when the DEIR assumed that only 1% of the mined material will be serpentinite. Contrary to the commenter's statement, engineered fill was not assumed to have 14.3% serpentinite; rather, the existing mine fill at the Brunswick site was assumed to have 14.3% serpentinite. Page 300 of the Air Quality Technical Report refers to existing mine fill at the Brunswick site which will be disturbed during site construction and assumes a conservative serpentinite content for the purpose of the health assessment due to limited testing in this area. The Hydrology Technical Report refers to estimated mining materials derived from proposed underground mining.

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.

Response to Comment Grp 7-170

The commenter asks how the ratios of the different types of rock to be mined can be known. The ratios of different barren rock types to be mined is shown in Table 4-5 of Appendix K.2 and is based on mine models developed by the applicant as shown on Sheet 15 of Appendix K.2. As stated in Section 4.4.1 of Appendix K.2, most of the underground work that would occur as part of the project would be tunneling to access the ore deposit and to provide access routes to move material and provide ventilation. These workings would be almost exclusively within barren meta-andesite rock. Cross-cuts into the mineralized veins would produce some altered meta-andesite, as well as diabase and serpentinite in some of the Idaho vein areas. The ASUR Plan, Mitigation Measure 4.3-2, and conservatism of assumptions in the Health Risk Assessment would ensure the protection of the public from heavy metals, silica, and asbestos should the ratio of rock mined vary from the assumed ratios estimated by the applicant.

Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Assumptions used in the health risk assessment for respirable silica are already very conservative. Further sampling would reduce the impact from silica. Please see Master Response 21 – Conservatism of Silica Assumptions.

Metal content of dust emissions are considered in the health risk assessment based on sampling and material ratios presented in Section 4.4 of Appendix K.2. The Health Risk Assessment used conservative assumptions of metal content in fugitive dust. Please see Master Response 20 – Conservatism of Metals Assumptions.

Response to Comment Grp 7-171

The commenter asked why more testing was not done in the Brunswick area. As shown on Sheets 5-7 of the Hydrology Technical Report (Appendix K.2 of the DEIR), the Brunswick mine is hosted in meta-andesite. Numerous meta-andesite samples were submitted for laboratory testing. Please see Responses to Comments Grp 7-157 and Grp 7-158 regarding volume and representation of samples from cores.

Response to Comment Grp 7-172

The commenter asked how the data from the sampling can be extrapolated to 2,585 acres of mineral rights that could potentially be mined. Economic gold mineralization does not exist everywhere within the 2,585 acres of mineral rights, so the geology of much of the 2,585-acre area is not relevant. As shown on Sheet 15 of Appendix K.2, assumed mining areas are based on the projected down-dip extensions to mineralized veins that were historically mined.

The barren and mineralized rock samples used for the geochemical evaluation presented in Section 4.4 of Appendix K.2 were collected to obtain data regarding the general geochemical character of the different geologic formations that would be encountered during mining.

As described in Chapter 3 (page 3-19) of the DEIR, underground exploration would take place after mine dewatering is complete and throughout the life of the mine. Exploration would be done primarily with diamond core drilling throughout the mine area. Exploration would produce core samples that would be brought to the surface for analysis to determine future mining areas. Therefore, numerous additional samples would be taken throughout the mine life, and the mine operator can adjust mine planning depending on the information obtained from additional samples.

Response to Comment Grp 7-173

This is an introductory comment. The commenter's specific comments are addressed in the responses to comments below.

Response to Comment Grp 7-174

This is an introductory comment. The commenter's specific comments are addressed in the responses to comments below.

Response to Comment Grp 7-175

The commenter opines that the project does not have sufficient information to meet the standards set forth for Canadian National Instrument 43-101. Canadian National Instrument 43-101 and regulatory definitions of Mineral Resources and Mineral Reserves are public disclosure regulations designed for the protection of investors investing in Canadian markets and are not relevant to the CEQA process for approval of a mine permit. As described in Chapter 3 of the DEIR Underground exploration would take place after mine dewatering is complete and throughout the life of the mine and would be done primarily with diamond core drilling throughout the mine area.

Response to Comment Grp 7-176

The commenter states that the sample testing method used for the project is not consistent with standards for Australian mine projects. However, Australian mining standards are not applicable in California, and the commenter fails to note the additional waste rock characterization that is required in California as part of the Report of Waste Discharge under California law and as mitigation by the DEIR. The level of testing completed thus far is appropriate for analysis of impacts under CEQA, and additional testing will be required for approval of WDRs. Please see Master Response 8 – Mine Waste Characterization. Mining waste regulations applicable in California are described on pages 4.8-28 through -30 of the DEIR.

Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project site. Testwork included Acid Based Accounting (ABA), Total Metals, and California Waste Extraction Testing (WET). The Waste Extraction Test (WET) should be used to determine the amount of extractable substance in waste rock (CCR Title 22 Division 4.5, Chapter 11, Article 5, Appendix II). The overall purpose of the barren rock and tailings sampling and laboratory analysis was to identify the general characteristics of that specific material type. Given that the objective was to understand the general character, the number of samples or the length of the samples compared to the total linear feet of core drilled for mineral exploration has no relevance. As such, the results of the barren rock testing provide reliable and representative results for consideration in the DEIR and for assessment of the potential effects of the use of that material for engineered fill and cemented paste backfill.

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and received an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). As described in Chapter 3 of the DEIR, underground exploration would take place after mine dewatering is complete and throughout the life of the mine. Exploration would be done primarily with diamond core drilling throughout the mine area. Exploration would produce core samples that would be brought to the surface for analysis to determine future mining areas.

Response to Comment Grp 7-177

The commenter asserts that the discussion in the Project Description, Section 3.7 of the DEIR, regarding water treatment does not include adequate discussion of treatment methods, constituents of concern and water quality standards for the discharge. However, section 3 of the DEIR presents the Project Description; it is not intended to provide any engineering design details, analysis of project effects, or data that supports the analysis of potential effects. The water quality discharge standards are disclosed in the EIR, in Table 4.8-2 on page 4.8-44. The narrative on pages 4.8-42 through 4.8-45 of the EIR discusses the treatment requirements and summarizes

the treatment methods to be used along with permitting requirements for the discharge. Appendix K.4 of the DEIR contains the Water Treatment Plant Design Report.

Mitigation Measure 4.8-1(a) requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 7-178

The commenter states that a monitoring plan should be required. A mitigation monitoring and reporting program will be required to enforce all mitigation measures imposed in the DEIR. With regard to water quality mitigation, Mitigation Measure 4.8-1(a) requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI will include water monitoring requirements for the permitted discharge. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 7-179

The commenter asserts that the information provided in the Project Description is insufficient regarding impacts from cemented paste backfill; however, Section 3 of the DEIR presents the Project Description; it is not intended to provide any engineering design details, analysis of project effects, or data that supports the analysis of potential effects. Discussion of the placement of CPB and the potential impacts of its use are provided in Chapter 4.8 of the DEIR, on pages 4.8-46 through 48-49. Section 4.4.2 of Appendix K.2 discusses and presents the results of DI-WET leach testing and acid-based accounting performed on four tailings samples (from which the mine backfill would be derived) for the project and Section 4.4.3 discusses the use of Portland cement in cemented paste backfill. Portland cement use of 25 tons per day (5% cement content in cemented paste fill) is assumed for the project as disclosed on page 295 of Appendix E.1. The grind size of the tailing's samples tested ranged from 80% passing 75 microns to 300 microns as discussed in Appendix H of Appendix K.2. The historic grind of ~80% passing 190 micron is assumed for the geotechnical study presented in Section 5.1.1 of Appendix H.1.

The "Desktop Study of Cemented Paste Backfill, ITASCA Denver, Inc. February 24, 2020." discusses in detail the tests on leaching characteristics performed for the project and concludes: "Based on the testing results described herein, Idaho-Maryland Mine flotation tailings have low sulfide content, are net acid-neutralizing, have solid-phase metals contents that are comparable to the average crustal abundances, and have leachate concentrations from WET-DI tests that meet all California primary MCLs. Thus, it is likely that the CPB used in the Idaho-Maryland Mine will have very low solute release rates and will be generally environmentally benign.

Response to Comment Grp 7-180

The commenter asserts that the DEIR does not include adequate sampling of rock to analyze water quality impacts from engineered fill placement, as compared to international standards. Please see Response to Comment Grp 7-177 and see Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 7-181

The commenter asserts that there is not sufficient engineering detail to ensure the engineered fill pads will be stable. However, engineering level detail is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.) The geotechnical engineering reports (Appendix H.1 and H.4 of the DEIR) provide specific grading recommendations for placement of mine waste as engineered fill in thin, horizontal lifts (layers). The new mine waste will not be placed on old mine waste or other existing fill unless the existing mine waste and fill is first reworked as engineered fill pursuant to the geotechnical engineering recommendations. The commenter may have misinterpreted the diagonal hatch pattern in the Rise drawings as represented end-dump layers. The hatch pattern does not represent the placement method and has nothing to do with the technical specifications for construction of engineered fill. The engineered fill is to be placed and compacted in thin horizontal lifts pursuant to the geotechnical engineering reports.

Response to Comment Grp 7-182

The commenter asserts that the seismic reports are not up to date and are inadequate because mine waste facilities need to withstand larger seismic events because of the long-expected life of the water facilities. The engineered fill will be composed of barren rock and dewatered tailings. No tailings ponds or "water facilities" for storage of mine waste are proposed. NV5 evaluated seismic risk and states on page 12 of Appendix H.1, "Based on our site observations, the geology of the region and our experience in the area, our opinion is that the risk of seismically induced hazards such as slope instability, liquefaction, and surface rupture are remote at the subject site."

The commenter also asserts that the description of the tailings in the geotechnical report for the Centennial site is inadequate. As stated on page 12 of Appendix H.1, the gradation similar to historic tailings gradation was assumed for analysis in the geotechnical report. The historic grind of ~80% passing 190 micron is shown to result in high gold recovery (97.2%) in metallurgical testwork provided in Appendix H of Appendix K.2. This assumption is representative of the tailings that will be placed as part of engineered fill.

Response to Comment Grp 7-183

The commenter asserts that the DEIR does not explain how tailings and waste rock will be blended to create engineered fill pads. However, NV5 provides recommendations for blending of rock and tailings on page 14 of appendix H.1 to the DEIR.

Response to Comment Grp 7-184

The commenter asserts that the likelihood of selling rock and tailings as construction aggregate is low because of potential sulfide contamination and liability issues. As explained in Section 4.4.1 of Appendix K.2, Sample MAA-1, which is the sample cited by the commenter as having 1.78% sulfide, is altered meta-andesite and this type of rock is expected to be a minor component of all materials produced (12 tons per day). Most of the underground work that would occur as part of the project would be tunneling to access the ore deposit and to provide access routes to move material and provide ventilation. These workings would be almost exclusively within barren meta-andesite rock that has low sulfide. As shown in Table 4-8 of Appendix K.2, samples MA-1, MA-1, MA-3 represent the unaltered meta-andesite rock where most tunneling would take place. For these unaltered meta-andesite samples, Sulphur HNO3 ranged from 0.02% to 0.27%. Tailings samples F-1 through F-4 ranged from 0.04% to 0.06%. As such, most of the rock produced by the project would not have significant sulfide content and would be suitable for use as construction aggregate.

Response to Comment Grp 7-185

As described in Section 3.0 of the DEIR, after full placement of fill at the Centennial and Brunswick Industrial sites to the pad design elevations hauling of engineered fill (barren rock and sand tailings) would shift entirely to be utilized in local and regional construction markets. With regard to storage of fill material on-site, please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets. No stockpiles of fill material are proposed on-site.

Response to Comment Grp 7-186

As discussed on page of Appendix K.2 of the DEIR, the restoration of the post-mining discharge through the drains would be comparable to existing conditions and, thus, not an impact under CEQA. However, once the mine discharge from the drains resumed, compliance measures may be required by RWQCB to address the Basin Plan, antidegradation, and other water quality standards. These measures might include sealing off areas of the underground workings that are the primary source of arsenic in the existing drain water, sealing the underground workings sufficiently to prevent seepage of water from the connected mine workings, obtaining an Individual NPDES permit upon closure, or treating of the mine water seeps after closure.

Mine water discharge is not part of the reclamation plan requirements of the California Surface Mining and Reclamation Act (SMARA); however, there will be water quality specific financial assurances for closure and post-closure maintenance of mining units as required by Title 27 section 22510. This may include the need for long-term water treatment of mine-related discharges. This issue will be addressed in the approval of the WDRs required by Mitigation Measure 4.8-1(d) and 4.8-1(e)).

Response to Comment Grp 7-187

The commenter asserts that the Union Hill Mine may have hydraulic connection to the Idaho-Maryland Mine and flooding may result. The Union Hill mine is discussed in Section 3.3.3.4 of Appendix K.2 of the DEIR. The Union Hill mine is a smaller mine than the others in the project area. It was closed in 1918 and has been flooded with water since that time. The Union Hill mine is not connected to any of the other underground mine workings in the area but is in close proximity to the workings of the Brunswick Mine. On April 17, 2019, the water level in the Union Hill shaft was 165 feet higher than the water level in the New Brunswick shaft. The Union Hill mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. The Brunswick mine tunnels in proximity of Union Hill were constructed around 1950. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine.

A “conduit” has not formed between the mines in the previous 70 years, which included active mine operations, as evidenced by the different observed water levels. The proposed mine pumping and treatment system, with a maximum capacity of 2,500 gpm has significant excess capacity over maintain dewatering needs. Any necessary safety procedures or measures relating to flood risk would be regulated by the Mine Safety and Health and Administration (MSHA).

Response to Comment Grp 7-188

The commenter asserts that the drill hole intervals were not included in the DEIR’s analysis. However, the drill hole intervals and locations where this material is derived are shown on Sheets 5-7 of Appendix K.2 to the DEIR.

Response to Comment Grp 7-189

Section 4.4.2 of Appendix K.2 discusses and presents the results of DI-WET leach testing on four tailings samples for the project. The grind size of the tailing's samples tested ranged from 80% passing 75 microns (Sample F-1) to 300 microns Sample (F-2) as discussed in Appendix H of Appendix K.2. The historic grind of ~80% passing 190 micron is provided in Section 5.1.1 of Appendix H.1 and shown to result in high gold recovery (97.2%) in metallurgical testwork provided in Appendix H of Appendix K.2. The DI-WET leaching results as shown in Table 4-7 of Appendix K.2 shows that metal leaching from tailings samples is low for all grind sizes including for Sample F-1 which was ground significantly finer than the historic grind size.

Engineering level detail is not required in an DEIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.) Even without that detail, the DEIR concludes that the effect of the proposed actions on water quality could be significant. The mitigation measures identify the steps that must be taken to reduce the potential impacts to less than significant. The engineering details described in this comment would be developed through the mitigation measures.

Response to Comment Grp 7-190

The commenter states that a different leach testing method should have been used on the tailings and waste rock samples. As discussed below, the method of testing the rock was appropriate under California standards.

The California Waste Extraction Testing (WET) method was used to determine the amount of extractable substance in waste rock (CCR Title 22 Division 4.5, Chapter 11, Article 5, Appendix II).

The Central Valley Regional Water Quality Control Board (CVRWQCB) has prepared the guidance document: The Designated Level Methodology for Waste Classification and Cleanup Level Determination, Updated June 1989. https://www.waterboards.ca.gov/centralvalley/plans_policies/guidance/dlm.pdf

Page 24 of the guidance document states that the results of the acid-base accounting would indicate which extraction solution should be used in the WET. The citrate buffer is appropriate for any waste which has an ANP to AGP ratio of less than 3:1. Deionized water could be substituted for the citrate buffer for wastes having an ANP to AGP ratio of 3:1 or greater.

As shown in Table 4-8 of Appendix K.2, the ANP to AGP ratios for all samples except for MAA-1 are greater than 3:1 and the use of distilled water is appropriate under the guidelines. A citrate buffer should have been used for sample MAA-1. However, this is a minor component of the barren rock and further testing will be required in the RoWD/WDR process.

Section 3.3.4 of the Designated Level Methodology Guidelines defines the Soluble Designated Level (SDL) for a constituent of a solid waste, expressed in milligrams of constituent per liter of extract from the Waste Extraction Test (mg/l of WET extract) is equal to: Water Quality Goal (mg/l) x Environmental Attenuation Factor ÷ 10. The technical report, Appendix K.2 of the DEIR compares the WET result directly to water quality goals in its discussions are therefore implies the assumption of 10 for the environmental attenuation factor. This is likely a conservative assumption as a "generic" environmental attenuation factor of 100 would more typically be assumed to make a preliminary assessment of how waste will be classified. (See page 32 of the Designated Level Methodology Guidelines)

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and received an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). The waste characterization and required testwork may include using kinetic testing. Please see Master Response 8 – Mine Waste Characterization.

As the commenter notes, WET results for aluminum presented in Table 4-7 are generally higher than the screening levels and low threat discharge permit limits presented in Table 4-10 of Appendix K.2. The total content of aluminum in the samples are not unusual and range from 421 to 41,300 mg/kg. This is significantly lower than the average crustal abundance of aluminum of 83,600 mg/kg (See Table 3 of Itasca Desktop Study of Cemented Paste Backfill). As discussed above, the potential impact of aluminum to water quality would be thoroughly investigated during the RoWD/WDR process required by Mitigation Measures 4.8-1(d) and 4.8-1(e). Any monitoring requirements would be specified in the approved WDR.

Response to Comment Grp 7-191

The commenter asserts that antimony should be monitored in the mine discharge water. WET results for antinomy presented in Table 4-7 are higher in samples MAA-1 and MS-1 than the screening levels and low threat discharge permit limits presented in Table 4-10 of Appendix K.2. The total content of antimony in these samples is also elevated. However, the lithologies represented by these samples are expected to be a minor proportion of barren rock (15 tons per day) produced by the project as explained in Section 4.4.1 of Appendix K.2. Any monitoring requirements, including monitoring for antimony, would be specified in the approved WDRs.

Response to Comment Grp 7-192

WET results for arsenic presented in Table 4-7 are higher in sample MAA-1 and MS-1 than the screening levels and low threat discharge permit limits presented in Table 4-10 of Appendix K.2. The total content of arsenic in these samples is also elevated. However, the lithologies represented by these samples are expected to be a minor proportion of barren rock (15 tons per day) produced by the project as explained in Section 4.4.1 of Appendix K.2 to the DEIR. Any monitoring requirements, including for arsenic, would be specified in the approved WDRs.

Response to Comment Grp 7-193

WET results for copper presented in Table 4-7 are higher in tailings samples F-3 and F-4 than the screening levels and low threat discharge permit limits presented in Table 4-10 of Appendix K.2. The total content of copper in the samples tested are not unusual and range from 27 to 141 mg/kg. This is similar to the average crustal abundance of copper of 68 mg/kg (See Table 3 of Itasca Desktop Study of Cemented Past Backfill). Any monitoring requirements, including for copper, would be specified in the approved WDRs.

Response to Comment Grp 7-194

As discussed on page 116 of Appendix K.2, water currently within the flooded mine workings has low dissolved oxygen (DO) levels, creating reducing conditions (low or no dissolved oxygen present and negative oxygen reducing potential). The low oxygen levels and reducing conditions prevent the oxidation of sulfide minerals, such as pyrite, that are exposed within the surfaces of the underground workings.

Please see Response to Comment Grp 7-190 regarding the use of deionized water in WET testing.

Any monitoring requirements, including for iron and manganese, would be specified in the approved WDRs.

Response to Comment Grp 7-195

The commenter states that nitrate will be higher than expected in mine water discharge. As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As stated on page 4-5 of Appendix K.4, low concentrations of NH3 may occur as a result of explosives used during periods of active mining and will be removed by the aeration process. If required, the efficiency of this aeration can be enhanced by increasing the pH. This will generate more of the gaseous form of NH3 which can be stripped from the water. Therefore, as a contingency component for Fe (and Fe/As), Mn, and ammonia treatment, sodium hydroxide (NaOH) will be included in the permitting efforts for pH adjustments should it become necessary to add alkalinity to the water for Fe (along with Fe/As) and Mn treatment, or to treat NH3 more efficiently or in higher concentrations than have been previously detected. In regard to ammonia treatment, this may occur as a result of explosives used during periods of active mining. Also see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 7-196

The commenter states that sulfate will be higher than expected in mine water discharge, but does not provide any evidence of that statement. Monitoring requirements for sulfate would be specified in the approved WDRs.

Response to Comment Grp 7-197

The commenter states that sulfide-sulphur is not reported on a per-sample basis. The purpose of the acid-base accounting (ABA) analyses is to identify the total acid generation potential and the total acid neutralization potential. However, the presence of individual sulfur forms for each sample analyzed is shown in Table 4-8 of Appendix K.2.

Response to Comment Grp 7-198

Mitigation Measures 4.8-1(d) and 4.8-1(e) requires submittal of a RoWD and approval of WDRs, which will address monitoring requirements and identify constituents of concern. The CVRWQCB will select the appropriate continents that require monitoring, which may include antimony, copper and nitrate as requested by the commenter.

Response to Comment Grp 7-199

The commenter states that leach tests for cement paste backfill need to be completed. The "Desktop Study of Cemented Paste Backfill, ITASCA Denver, Inc. February 24, 2020" discusses in detail the tests on leaching characteristics performed for the project and concludes: "Based on the testing results described herein, Idaho-Maryland Mine flotation tailings have low sulfide

content, are net acid-neutralizing, have solid-phase metals contents that are comparable to the average crustal abundances, and have leachate concentrations from WET-DI tests that meet all California primary MCLs. Thus, it is likely that the CPB used in the Idaho-Maryland Mine will have very low solute release rates and will be generally environmentally benign."

Mitigation Measure 4.8-1(d) requires the applicant to submit a Report of Waste Discharge (RoWD) and received an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill, so additional testing will be done as requested by the commenter.

Response to Comment Grp 7-200

The Commenter asserts that the DEIR has a fundamental lack of information on the economic viability of the mine, and potential environmental impacts related to geochemistry and water quality. Geochemistry and water quality are addressed in detail in Chapter 4.7, Hydrology and Water Quality, of the DEIR, and the accompanying technical reports, namely Appendix K.2 of the DEIR. The economic viability of the mine is outside the scope of CEQA.

Based on the Commenter's above summarized assertion, he states the DEIR should analyze an alternative that provides for dewatering and underground exploration without allowing for mining. This proposed alternative is not economically feasible because there is significant cost with dewatering the mine, including construction of a water treatment plant, installation of a potable water pipeline to provide water to affected well owners, and underground access and safety improvements necessary to complete the suggested exploration phase. The proposed alternative would be economically infeasible because all the above costs would be incurred without the ability to produce any valuable minerals to offset that cost. Additionally, the proposed alternative would not meet the first project objective, which is "Construct a commercially viable, financeable, major underground gold mine operation that will produce 1,000 tons per day (365,000 tons per year) of gold mineralization." As the proposed alternative does not meet the first project objective and would be financially infeasible, the alternative is rejected from further consideration.

Group Letter 8

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March 30, 2022

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Re: Comments on the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project (Project, Mine)

Note documents cited and submitted under separate cover:

- Baseline Environmental Consultant Report, Feb 15, 2022 (Baseline).
- Salter Report, March 9, 2022 (Salter).
- Comments on the Draft EIR for the Idaho-Maryland Mine Project - 16Mar22, Center for Science in Public Participation (CSP2).

Grp 8-1

Our review of the DEIR has identified significant issues regarding the adequacy, completeness, and conclusions of the report.

Aesthetics

Grp 8-2

Images of the facilities presented in the DEIR are not a fair representation of the actual visual character of the project; consequently, the DEIR understates the Project's visual impacts. The perspectives reduce the perceived size of the structures, and the viewpoints are often restrictive in terms of providing a full view. To provide an accurate representation of the project, the revised DEIR must provide better viewpoints that preserve a 1:1 accuracy with the true width to height ratios of the structures.

Grp 8-3

The use of an "erosion control seed mix" for reclamation of the mine waste piles will create the image of a dead zone, especially during the dry seasons. Native vegetation including deciduous and evergreen bushes and trees should be required as a mitigation to reduce the stark contrast between the disturbed site and the normal (current) vegetation.

Air Quality

The DEIR provides no evidence that the project's long-term NOx, ROG, and PM10 emissions will be mitigated to a less-than-significant level.

Grp 8-4 The DEIR fails to adequately mitigate the Project's air quality impacts. It relies on a bare minimum of mitigation measures recommended by the Northern Sierra Air Quality Management District (NSAQMD) to address air quality impacts, and these measures only address emissions during a one year period of construction. As we explain below, construction will certainly last longer than one year. In addition, the mitigation measures do not address the long-term emissions that will result from 80-years of mining operations associated with the Project. As a result, there is no evidence that the Project's long term emissions have been mitigated to a less-than-significant level, as concluded by Baseline Engineering Consultants (Baseline).

The revised DEIR must identify feasible and effective mitigation measures that address emissions from 80-years of mining to ensure that emissions are kept at less-than-significant levels. Otherwise, the EIR must identify these long term impacts as significant and unavoidable.

Mine exhaust moisture creates potential air quality, hazard, and aesthetics impacts.

The DEIR provides no information about the potential obstruction of the airspace surrounding the airport. (See also, "MineExhaustMoisture, attached as a reference to this letter). The Loma Rica Drive Industrial Area Plan states:

Grp 8-5 "Any proposed object or structure which would penetrate any imaginary surface is considered by the FAA to be an obstruction to air navigation and requires an FAA aeronautical study to determine whether a potential obstruction will have a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft." (Loma Rica Drive Industrial Area Plan, May 27, 2008, p38-39)

Although the DEIR does not disclose it, the mine ventilation system would discharge 200,000 cfm of saturated air at 68F degrees from the top of the headframe with an upward velocity of 7.7ft/sec. (DEIR Appendix E.1_AQ-GHG Report (p371 of 1938)) The headframe is located within the Loma Rica Airport Safety Zone 5. Under some weather conditions, the large volume of air exhaust may form a persistent cloud plume or fog. In addition, the large mass of air moving upwards may create turbulence, also a potential hazard. These are potentially significant and unavoidable impacts..

Grp 8-6

Grp 8-7 This plume and associated fog as well as the tall headframe will also result in potentially significant visual impacts in this rural area where this type of view is not expected.

Grp 8-8 The revised DEIR must evaluate the following relative to the headframe and moisture emissions:

- When will these conditions be present and to what extent?
- What are the aesthetic and aircraft hazard impacts?

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Air Quality

Management of safeguard controls for asbestos is inadequate.

(See "ASUR Plan Analysis.pdf", attached as a reference to this letter. Portions of that document are summarized here.)

Grp 8-9 The plan described in the DEIR for managing asbestos-laden mined materials is inadequate. Asbestos is likely to be released during underground blasting, crushing, and ore processing. It also is released during material handling, on-road transport, placement grading and compaction. The DEIR states that the Asbestos Management Plan would ensure that average mined material and engineered fill contains less than 0.01% asbestos. (DEIR 3-20) Testing the asbestos content, however, does not control the amount of asbestos in the actual material mined. To control the average amount of asbestos in output materials (and to avoid significant impacts related to asbestos exposure), the DEIR must ensure that asbestos levels do not exceed this threshold. Currently, the DEIR does not include any evidence that asbestos levels will not exceed this threshold.

Grp 8-10 The testing process may require up to two weeks before the results are known, yet the Project calls for daily mining activity to continue during this time. This daily mined material would have to be stockpiled while awaiting the test results, which could expose workers to dangerous levels of asbestos. The DEIR does not disclose this fact nor does it analyze the associated impacts.

Grp 8-11 In addition, if the running average of asbestos in the daily mined material exceeds the required threshold, batches containing higher asbestos levels would have to be stockpiled in order to be later paired up with batches having lower asbestos levels. The DEIR does not disclose this fact nor does it analyze the associated impacts or recommend mitigation measures.

Grp 8-12 The mineral processing described in the DEIR does not address the need for stockpiling materials or address the likely impacts of such efforts. The Asbestos Management Plan provided in the revised DEIR must detail all of the steps necessary to carry out the correct management of this hazardous waste, including the location and organization of stockpiled materials, and adequate safeguards to avoid fugitive dust emissions and potentially hazardous conditions.

These deficiencies point to potentially significant and unavoidable impacts and must be analyzed in the DEIR.

The management of fugitive dust after it leaves the mining facilities is inadequate.

Grp 8-13 In 1986, asbestos was identified by the California Air Resources Board (CARB) as a TAC. CARB also determined that there is not enough scientific evidence to identify an asbestos threshold level below which no significant adverse health effects are anticipated (17 CCR 93000,Implementation Guidance Document 2017, CARB pg 1) (See Health Risk Assessment Critique (HRA Critique), attached as a reference to this document.)

As a TAC, asbestos, as well as respirable crystalline silica, fall under the non-criteria air pollutant category because they lack an identified safe "threshold level below which no significant adverse health effects are anticipated." There are no established limits for monitoring emissions of non-criteria

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air pollutants, silica and asbestos, into the ambient environment. The Health Risk Assessment is based on 30 years of exposure, so the cumulative effects from 80 years have not been addressed. Both silica and asbestos are inert substances not subject to environmental degradation that will have potential impacts beyond the 80-year project permit (HRA Critique).

The revised DEIR should establish asbestos mitigation protocols and robust monitoring systems of waste rock during transport and disposal to ensure the protection of workers and the public from the adverse health effects associated with the TACs, asbestos, and respirable crystalline silica. Without identifying clear and achievable mitigation measures, the DEIR must identify this as a significant and unavoidable impact.

The DEIR Health Risk Assessment used invalid meteorological data to determine emissions and should be redone.

Grp 8-14

Toxic Air Contaminants (TAC) are toxins which may cause or contribute to an increase in death or serious illness from cancer and other acute or long-term diseases. TACs may cause health damage even at extremely low levels, and are found in, among other items, vehicles, off-road equipment, blasting emissions, and fugitive dust sources. (HRA Critique)

TAC ingredients include particulate matter from diesel emissions, asbestos dust, silica dust, heavy metals, ammonium nitrate fuel oil, hexavalent chromium, and radon – all of which will be produced by mining activity, and which can become airborne, traveling on wind currents toward population centers around Nevada County.

Many establishments are located within a two mile radius of the mine including the hospital, assisted living facilities, health centers, physicians' offices, non-profit organizations, business parks, county offices, shopping centers, apartment complexes, and hundreds of private residences. TAC releases from the mine have the potential to adversely impact these receptors.

In Nevada County, the mortality rate from Chronic Lung Disease is already – without the added toxic emissions from the mine – double the statewide rate. Nevada County also has higher-than-state-average levels of air pollutants, ozone and particulate matter, radon, chronic disease, an aging population, and poverty. Given the extent of health risk to so many and so wide a range of people, the DEIR's health risk assessment is completely inadequate.

The HRA relies on questionable assumptions. The model relies on meteorologic input data, with the quality, quantity, speed, and direction of travel of the air toxins dependent on these meteorological factors. Yet the meteorological data input used by Rise comes from a Blue Canyon site - not from a Grass Valley site - an area with a significantly different meteorological profile than that of Grass Valley.

Blue Canyon, located on Highway 80, bears little meteorologic resemblance to Grass Valley: it notably deviates from Grass Valley in elevation, temperature, rainfall, snowfall, wind speed, and wind

direction. Using Blue Canyon's meteorologic data will not correlate with Grass Valley meteorologic data under any circumstance, making any TAC statistic invalid.

Therefore, the DEIR's Health Risk Assessment must be revised using valid meteorological data, in order to accurately assess the potential health impacts of the mine's toxic air. Once the HRA is revised, the DEIR must also be revised and recirculated for public review and comment.

Radon levels need adequate assessment.

Grp 8-15

The DEIR does not disclose the background radon level of all homes and properties near the project. The DEIR also does not disclose the effect that dewatering or mining operations including blasting will have on radon levels. Nor does it describe the effect that mining operations will have on radon levels.

It also does not explain whether blasting operations will increase radon and, if so, the environmental impacts of increased radon levels. The revised DEIR must provide a comprehensive analysis of radon-related impacts.

Biological Resources

Proposed mine dewatering activities have the potential to have asignificant impact on dependent biological resources.

Grp 8-16

The DEIR fails to adequately address biological and aquatic resources, and hydrological impacts to those resources.

The DEIR's biological surveys exclude an entire reach of South Fork Wolf Creek (SFWC). Species of special concern are inadequately considered and qualitative data for benthic macro-invertebrates (BMI) is missing. (Wolf Creek Community Alliance (WCCA), Benthic Macroinvertebrate Analysis, 2007)

Aquatic resources are excluded through an inaccurate hydrological assessment of the full length of SFWC, ignoring the connectivity of the creek upstream and downstream of the culvert on the Mine property, thus failing to consider the movement of trout and other aquatic species.

Grp 8-17

Hydrological impacts due to mine dewatering into SFWC are inadequately studied, mischaracterized, or not considered. The initial dewatering rate of 2500 gallons per minute (gpm) would be followed by 80 years of subsequent operational dewatering at 850 gpm and as much as 2500 gpm. The DEIR fails to adequately consider this long-term higher rate of discharge. Nor does the DEIR consider the seasonality of stream flow, loss of streambed or streambank habitat, changes in temperature, differences in Specific Conductance (EC), and habitat for BMI. Drawdown of the water table due to dewatering is also underestimated and its impacts to meadow, wetland, and forest habitats are not considered. Further, the DEIR fails to consider chronic and cumulative impacts to BMI, trout, and other aquatic species, including special concern amphibians. (WCCA)

Overall, because the DEIR does not adequately address biological and aquatic resources or sufficiently analyze hydrological impacts, this document must be revised.

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Centennial Site - Biology

Grp 8-18

Removal of flora, fauna, topsoil, wetlands and overburden down to bedrock to prepare the Centennial site for mine waste dumping represents a significant impact.

The Project calls for the removal of flora, fauna, topsoil, wetlands and overburden down to bedrock to prepare the Centennial site for mine waste dumping. The DEIR fails to adequately address impacts to these resources. It must be revised to provide this analysis.

Baseline vegetation conditions are unknown.

Grp 8-19

The DEIR is required to identify all special status species within 5 mi of the site. Note that the 5 mile radius map on Appendix F.3, page 33, is located in the wrong spot, approximately ½ mile from the site. The 5 mile zone must be corrected to include the correct area, and any additional species within that area must be identified.

The Draft RAP is still under review by the Department of Toxic Substances Control (DTSC) and thus the baseline conditions for the evaluation of biological and other impacts are based upon speculation. For example, the following statements are provided:

Grp 8-20

- Biological, vegetation communities: "...because it cannot be precisely established for the baseline condition given that the baseline has been adjusted to account for the separate remediation efforts that will be conducted..." (DEIR 4.4-3).
- Biological, aquatic resources: "...the exact acreages of each aquatic resource type cannot be precisely established for the baseline condition given that the baseline has been adjusted to account for the planned remediation efforts that will be..." (DEIR 4.4-10).

Grp 8-21

Approval of the Draft RAP by DTSC is uncertain. Consequently, the revised DEIR must use a baseline of "existing conditions."

Wetlands will be unnecessarily destroyed.

Grp 8-22

The Centennial RAP remediation requires placement of four feet of topsoil as cover material over the treated areas. The areas will then be revegetated. This is a temporary fix. Later, the topsoil will be removed and engineered fill from the mine operations will be placed on this area, forming the new mining operation's tailings pile.

As stated in the RAP draft, the topsoil for the RAP remediation will be coming from onsite "borrow" areas, and to obtain it, wetlands will be destroyed, a significant impact. However, the destruction of the wetlands could be substantially reduced by not removing the soil from those "borrow" areas. This is a feasible mitigation which must be discussed in the revised DEIR.

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In addition, the DEIR fails to identify where the cover soil will be placed after the remediation is completed in order to begin placement of mine waste from the Project operations.

Grp 8-23

- Will it be stored on site? Where?
- Will it be hauled off site? Where?

The revised DEIR must disclose this information and must analyze the associated direct and indirect environmental impacts.

Pine Hill flannelbush is not adequately protected.

Grp 8-24 The planned work to physically close the South Idaho Shaft and Tunnels on the Centennial site and the DEIR does not adequately document its phasing. This work is planned to take place before mine waste is dumped on the Centennial site and could conceivably be implemented prior to the DTSC Cleanup on that site. The DEIR fails to map the location of the shaft, tunnels, and all related work on the shaft as it relates to the Pine Hill flannelbush. The revised DEIR must analyze impacts to Pine Hill flannelbush caused by this phase of construction. Given the possibility that South Idaho work could proceed independently, and that the DTSC work could conceivably take place in conjunction with that work or be impacted by that work, the revised DEIR must include a clear work phasing plan to guarantee adequate protection of the flannelbush.

Grp 8-25 Within the DEIR's "Appendix F.3_The Centennial Impact Tech Memo" and Appendix F.4_Centennial HMP Pine Hill flannelbush.pdf", and others, the phrase "should be avoided" is used repeatedly as a guidance for protecting biological resources. The word "should" is unenforceable. It must be corrected to "shall" or "must".

Grp 8-26 The DEIR's Habitat Management Plan for Pine Hill flannelbush proposes to remove 18 plants. It also indicates that four plants are located within 30 feet of the edge of the engineered fill and could be impacted. The DEIR does not disclose why these 18 plants must be removed. The DEIR's mitigation should be revised to eliminate the need to remove these plants.

Grp 8-27 The DEIR must also include information on the relocated re-establishment time required for transplanted plants, and site activity phasing must be provided to ensure that the re-establishment time is included.

Grp 8-28 Impacts to the Pine Hill flannelbush as the DEIR is currently written are significant and unavoidable. The DEIR must be revised to evaluate these impacts and provide feasible and effective mitigation.

Centennial Site

Grp 8-29 **The DEIR does not adequately define the Mine Project to include the Centennial site and accordingly, fails to identify all potential impacts.**

The DEIR fails to adequately address impacts associated with the Centennial Industrial Site (Centennial). This site is the location of hazardous waste left over from past Idaho Maryland Mine operations. The DEIR assumes that the Centennial site will be cleaned up before the use of the site for

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deposition of new mine waste. Yet the significant work which is needed to accomplish this clean-up is not disclosed nor evaluated in the DEIR. Rather, the DEIR assumes that the clean-up has already been accomplished, and uses the post clean-up conditions as the baseline for some of its environmental impact assessments.

The DEIR does not describe the current physical conditions of the Centennial site or include the necessary clean up of the existing contamination at that site as part of the Project because it assumes that Centennial will be cleaned up prior to the start of construction. As discussed above, the clean up for Centennial has not been approved by DTSC and it is unclear when DTSC might approve the clean up. Consequently, it cannot be excluded from this DEIR. As a result, any assumptions about baseline conditions for purposes of assessing impacts to the Mine Project are speculative at best, and at worst, significantly underestimate the actual impacts of the Project.

Grp 8-29

The current conditions of the Centennial site must be used as the DEIR baseline in order to meet the CEQA requirements for a full analysis of the impacts of the Mine Project. Moreover, the Centennial clean up should be included as part of the Project to address the whole of the action under CEQA. In order to accurately assess impacts, the existing conditions, or baseline, of the Project must be the current state of the Centennial site, not a speculative future condition.

The DEIR states that Rise intends to complete the site cleanup independently of the mine, but no final plans have been provided. Currently a Draft Remedial Action Plan (RAP) for the cleanup of the Centennial Site is being reviewed by the DTSC.

The assertion that Rise intends to complete the cleanup regardless of the status of the mine project is not credible. This statement was made to avoid addressing the impacts of the cleanup within the DEIR. It is clear that the RAP and the IMM Project are integrally related:

- The Draft RAP states that the site is being prepared for mine waste.
- The Draft RAP calls for preparing the site for mine waste, including removal of vegetation, removal of soil down to solid base to create a solid base for planned mine waste dumping.

Cumulative impacts to groundwater will result from Centennial site cleanup.

Grp 8-30

Groundwater recharge will be reduced by the proposed Centennial cleanup project as described in the Draft RAP. This is due to plans to move contaminated materials into the east portion of the site and cover with a cement and small aggregate (spread onsite and rotary mixed) impermeable layer of materials. In addition, the project would require that wetlands be removed. The DEIR fails to disclose that wetlands and marsh-like vegetation slow the surface flows and allow more water to percolate into the ground. The revised DEIR must take this into account when determining the project's effect on groundwater recharge combined with groundwater impacts from the remainder of the project.

Grp 8-31

Preparations for mine waste dumping is proposed to take place up to the boundaries for protected species, wetlands, and riparian setbacks. It is difficult for heavy equipment operators to perform tasks in close proximity to boundaries, and if excavation is involved, even hand work can create impacts. For example, on the Centennial site, the removal of top soil down to bedrock for mine waste dumping may involve pulling away of the supporting soil for protected areas. Soil can collapse from beyond the boundary, roots can be damaged, etc. The DEIR fails to analyze any of these impacts. The revised

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DEIR must provide this analysis and identify feasible mitigation for these impacts. Mitigation must include, at a minimum, the establishment of an additional buffer zone between a protected area boundary and an allowed work area, with consideration of the particular activities governing the amount of buffering that is appropriate. This buffer zone must be mapped.

Nor does the DEIR disclose whether the soil, the vegetation, and the vegetation roots within the boundaries of the protected areas would be protected during excavation. It is imperative that excavation not cause soil loss or damage.

Economic and Housing Impacts

Grp 8-32

The mine will bring new employees, many of whom will likely be renters in the low and moderate income wage levels, worsening the already impacted housing market. Physical impacts can result from a tighter housing market: For instance, the numbers of middle and low income workers commuting into Grass Valley will increase. Also, the project may cause a trickle down effect of increased homelessness and a corresponding increase in homeless encampments in impacted wildland areas.

These issues and associated mitigation must be discussed in the DEIR. For example, mitigation should be identified to ensure that sufficient affordable housing is provided nearby for the project's employees.

Hazards and Hazardous Materials

Drawdown of groundwater within the mine workings may increase the potential for settlement or collapse of shallow workings which will affect individual property owners directly.

When the water level in the mine workings is located near the ground surface, the drawdown of groundwater within the mine workings may increase the potential for settlement or collapse of shallow workings that were not formally closed. These issues are discussed in "DEIR Appendix H.6_Geotech Review of Near-Surface Features.pdf"

Grp 8-33

The building at 125 Spring Hill Drive sits on top of the Eureka Shaft. Though it was studied in 1985 and design recommendations for closing the shaft were produced, the actual method of closure is unknown. The DEIR provides no documentation or explanation about how these shaft closures will be carried out. Mine water is 35 feet down at the 125 Spring Hill Drive site. Though the DEIR states that the water is "likely in bedrock", it is not verified and dewatering could cause settlement or other damage.

The DEIR states that the mine applicant will "assist" businesses that sit atop mine works which may be affected by mine operations but the DEIR does not identify a financial assurance mechanism to compensate the landowners (including 125 Spring Hill Drive) if the dewatering causes damage or loss.

The Eureka Vertical Shaft is under the sidewalk and pavement at Spring Hill Dr and IM Rd. The water level is 17' below this location. Again, the DEIR does not identify any assurance that the City and/or land owner would be compensated if the dewatering causes damage or loss.

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Grp 8-34

There is potential for sinkholes to occur where undocumented mine features may exist, particularly in areas where current mine water levels are closer to the surface. One example was some settlement caused by an unknown feature that was observed approximately 5 years ago approximately 100' South of the Idaho Pump Shaft (DEIR H.6, pg5)

Grp 8-35

The DEIR makes no clear statement of liability about what happens if historic mine works settle around the near surface features as a result of dewatering. This leaves private business and local government vulnerable to assume the costs from failed mine infrastructure. This is a potentially significant and unmitigated impact. The revised DEIR must provide a full analysis of these impacts and identify feasible and effective mitigation.

Grp 8-36

The DEIR inadequately describes potentially hazardous waste rock and mine tailings management.

As pointed out by Baseline Engineering Consultants (Baseline), the legacy contamination from prior mining indicates that the types of rock historically mined at the site contain heavy metals and, when excavated, these waste rock and mine tailings have been found to contain contaminants that pose a potential risk to people and the environment.

"Neither the DEIR Project Description nor the Hazards and Hazardous Materials section adequately describes how future waste rock and mine tailings generated by the proposed project would be managed to ensure that they do not pose a health hazard to people or the environment (as the placement of similar waste materials from the same mine did in the past)" (Baseline).

The revised DEIR must provide adequate information about the potential risks of the waste rock tailings and all potential impacts.

Grp 8-37

Probabilities of collapse hazards are not adequately addressed.

In evaluating the potential risks due to existing near surface features, the DEIR makes the following claim and is used as the basis for the scope of the report:

"In addition, the underground mine workings focused on removal of quartz vein materials that are generally narrow, so the collapse of a deep (e.g., 100 feet bgs) mine feature is not likely to be expressed at the ground surface."(DEIR Appendix H.6, pg 2).

Note that "not likely" is an ambiguous metric that can be satisfied by a less than 50% chance of occurrence. This is not the same as "there is No Potential for collapse". The DEIR does not disclose the following:

- The estimated likelihood of occurrence: Is it greater than zero?
- Whether the mine workings would be confined to narrow quartz veins.
- Mine works include voids due to tunneling, stoping, etc. Given that the mine works were in a fractured rock geology and may contain additional mine features such as stopes near surface but below 100', what is the justification for this 100' determination?

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Grp 8-38

In addition, the DEIR fails to analyze the potential for collapse from all existing mine features. It also fails to evaluate the effects upon legacy mine works due to combined destabilizing activities such as dewatering, earthquakes, and use of explosives. The revised DEIR must provide these analyses.

The DEIR's evaluation of seismic hazards due to faults and mining is inadequate.

Grp 8-39

The mine project would target potential ore bodies that are more or less bounded by the Morehouse fault, the 6-3 fault (Weimar), and the Idaho fault, as well as numerous lesser faults. While the faults in this area are designated as being in a type C fault zone, with low seismicity and a low rate of recurrence, the DEIR does not analyze the effect that a seismic event would have on the mine or workers in the mine. (See FaultingHazards, attached as a reference to this document.)

Throughout the 80 year life of the proposed project, expansion of mine works will remove 30 million tons of rock mass, and change the overall competency of the surrounding bedrock. In addition, several million tons of mine waste will be positioned over or near the faults. Finally, at the end of mine operations, the mine will re-flood, leading to an additional potential increase in seismic activity due to the re-introduction of hydrostatic pressures (FaultingHazards).

Grp 8-40

The seismic reports discussed in the Geology section of the DEIR are not up to date and, even if updated, would not meet the requirements for a probabilistic seismic site analysis. (CSP2, p7)

The revised DEIR must include a complete and comprehensive analysis of the potential hazards due to seismic activity as a result of the Mine Project.

Potential mine flooding and worker safety from groundwater occurrence in mine workings.

Grp 8-41

In the DEIR's discussion of the Union Hill Mine, it is noted, "The Union Hill Mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine."

There are two important points to note in this discussion, (1) the Union Hill Mine is very close to the Idaho-Maryland at several levels; and, (2) there has been a possible weak hydraulic connection between the two mines, which is only logical.

There is no discussion in the DEIR of the potential impacts for the Idaho-Maryland Mine if flooding were to occur during mining. According to ITASCA's report (DEIR Appendix K.3, Figure 2-3), there are extensive abandoned mine workings above and adjacent to the Idaho-Maryland Mine that would remain flooded after the Idaho-Maryland is dewatered. If a conduit between these two mines were to open, for instance due to the widening of a fracture related to blasting vibrations or a seismic event, the flood of water into the Idaho-Maryland could be rapid and catastrophic for anyone working in the mine.

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The DEIR must be revised to evaluate the potential risks of flooding during mining operations, including potential risks to mine workers. (CSP2)

Greenhouse Gas Emissions

The DEIR relies on an arbitrary threshold for greenhouse gas emissions.

Grp 8-42

The DEIR states greenhouse gas (GHG) emissions from mine operations would be just under 10,000 metric tons (MT) of GHG carbon dioxide equivalent (CO2e) per year. This number was chosen as a bright line threshold based on other air districts in California that included Placer County, Sacramento Metropolitan Area, the Bay Area and Southern California. Neither the Northern Sierra Air Quality Management District (NSAQMD) nor the County have adopted numerical thresholds of significance for GHG emissions that would apply to the Project. The DEIR does not discuss the justification provided by each air district for adopting the 10,000 MT CO2e per year threshold, nor does it provide substantial evidence for applying this threshold to the project to demonstrate how it will achieve a fair share of the statewide GHG reductions goals for 2030 and beyond.

The DEIR must be revised to identify and provide justification for a GHG threshold of significance that will achieve the statewide GHG reductions goals for 2030 and beyond over the proposed 80 year lifetime of the mining permit. (Baseline)

The DEIR underestimates GHG emissions from haul trucks.

Grp 8-43

The DEIR states that the Centennial Industrial Site will be used for mine waste dumping to form "engineered fill" during the first 5 years of mine operations. The DEIR's analysis assumes that the Centennial Site remediation to remove toxic mine waste would be completed before the mine opens. However, since the remediation of the Centennial Site is not included in the DEIR analysis and, as indicated in the Project Description, may not be completed in any specified timeframe, "...it is speculative at best to assume that the Centennial Industrial Site will be available for fill placement." (Baseline)

To accurately account for the Project's GHG emissions, the DEIR should have assumed an additional five years of off site hauling at the beginning of operations. This additional hauling would generate significantly more emissions than disclosed in the DEIR. This also holds true for criteria air pollutants as well.

The GHG emission should be updated in the revised DEIR to include the prospect of the Centennial Site being unavailable for mine waste dumping.

Mining energy requirements would eliminate gains attained through the Nevada County Energy Action Plan.

Grp 8-44

The Nevada County Energy Action Plan calls for a 51% reduction in GHG emissions for electricity use by 2035, which is in close alignment with state goals. The Plan calls for residential energy reduction savings from building efficiency of 42 million kilowatt hours per year (kWh/Yr).

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The DEIR states the amount of electricity required to operate the mine would be approximately 49 million kWh/Yr (DEIR p. 4.3-59), which would erase any residential electricity savings attained by the Plan.

The total non-residential electricity use of the county in 2017 was 53 million kWh/Yr. So, GHG emissions from this one mining project alone would almost equal all other non-residential electricity use in the County and wipe out the projected 9 million kWhYr non-residential building efficiency savings.

Asking residents and business owners to cut down on their use of electricity while allowing the GHG emissions from the mine would be highly counter-productive and unfair. The DEIR must explain how the project intends to comply with the emission goals of the Nevada County Climate Action Plan.

The California Air Resources Board 2017 Climate Change Scoping Plan stated: "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." Given these facts, the DEIR must establish a net zero threshold for new GHG emissions from the Project and declare the project has significant and unavoidable impacts.

Cement manufacturing is not included in the DEIR's GHG analysis.

Cement manufacturing is a significant GHG source. The DEIR does not provide adequate information about the amount of cement that will be used for the cement paste backfill (CPB). Nor does it include GHG emissions from CPB. Based upon the number of cement truck trips, (468 trips/year, DEIR 4.3-53) and an 8 cubic yard payload of 9.2 metric tons, the emissions can be estimated.

Grp 8-45

The national weighted average carbon intensity for cement production is estimated at 0.97 metric ton CO_2/ton cement. Thus, each cement truck would contain cement that released about 8.3 metric tons of CO_2 when it was produced. Operationally, 468 truck trips would mean 3,884 metric tons of CO_2 were released in a year of cement production for the mine.

Therefore, the amount of cement manufacturing needed to create the CPB with 500 tons of rock waste per day constitutes a major GHG source contributing emissions on the order of 3800 metric tons per year of GHG CO_2e. The energy and environmental impacts of cement production used in the project should have been included in the DEIR.

The revised DEIR should provide adequate information to quantify these GHG emissions.

Grp 8-46

In addition, following initial onsite ore processing using sulfide flotation, the resulting gold concentrate would be shipped off site for further processing to extract the gold. The full energy and environmental impacts of further offsite transport and gold processing are not part of the DEIR and should have been included.

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Hazardous Materials

Provisions for temporary storage of explosives on the surface are inadequate.

Grp 8-47 Several years of construction activities will require explosives prior to the construction of the longer term explosive storage facilities underground. Explosives will be needed for the construction of the new access shaft, reclamation of existing mine works, and development of storage areas and waste rock processing areas. The revised DEIR must identify the quantity, type and management of early phase explosives during construction.

The DEIR's emergency evacuation analysis is inadequate because it only discusses the haul trucks but not trips associated with the mine's employees.

The DEIR's analysis (Section 4.7-4) of emergency evacuation impacts is inadequate. For example, it focuses on haul trucks but fails to analyze the effect the evacuation of mine employees would have on the emergency evacuation of area residents.

Grp 8-48 The DEIR, Table 3.8, "Operations Workforce", shows there will be 111 employees per shift adding roughly an equivalent number of vehicles exiting on Brunswick Road during an emergency evacuation.

The DEIR states that, "According to the Table 4.1 of the Circulation Element of the General Plan, Brunswick Road is considered a Minor Arterial, and thus, is not a primary evacuation route for the County." The DEIR neither addresses the safety plan for mine workers nor provides any mitigation if additional vehicles must use a minor arterial during an emergency evacuation.
Having to use a minor arterial for evacuations could result in a potentially significant emergency evacuation impact. The DEIR must be revised to provide a thorough analysis of these impacts. It must also fully mitigate for the Project's emergency evacuation impacts.

The DEIR provides no details about the transport and storage of any other explosive materials besides Ammonium Nitrate, specifically detonators, explosive magazines, and detonating cords.

Grp 8-49 The DEIR states the mine will use 257 detonators a day. Table 4.7-1, "Explosives Proposed to be Used at Project" lists nine different types of detonators. However none of these are listed on the Hazardous Materials Inventory Statement Form and there is no information about how detonators or detonating cords would be stored. Nor does the DEIR provide information about how many and often these explosive materials would be transported through Grass Valley. Only ammonium nitrate is included in the 28,000 pounds of explosives shown on the "The Brunswick Industrial Site Nevada County Department of Environmental Health Hazardous Materials Inventory Statement Form" submitted by Rise Grass Valley.

Without this information, it is not possible to evaluate the environmental impacts associated with the transport and use of explosive materials. The revised DEIR must specify the transport and management of all explosive materials used in mining operations, in addition to Ammonium Nitrate.

Curing of mass concrete can generate significant heat and needs to be managed.

The project would dispose of 500 tons/day of sand tailings back into the mine by using Cement Paste Backfill (CPB). The quantities of cement to be used in this process are not specified in the Cemented Backfill Study written by the consultant Itasca that was submitted by the applicant. The DEIR should provide a range of expected cement usage as a basis for determining the impacts of the CPB process.

No analysis of heat generated by CPB is provided in the DEIR. For example, using a standard 6:1 ratio of tailings material to cement would require 83 tons of cement per day. The curing of cement (hydration) is an exothermic reaction with heat emissions exceeding 230kJ/kg, depending upon the cement Type. Using a conservative value, the heat from curing 83 tons of cement/day would add over 17 million KJ/day* to the environment. The revised DEIR must address the thermal impacts of CPB, including the following:

Grp 8-50

- How much cement would be used daily?
- How much heat would the curing cement produce? Over what area?
- What would be the maximum temperature of the curing CPB?
- Would it exceed 158 degrees F?
- What would be the resultant average and maximum temperatures in the backfill areas over time due to the daily additions of CPB and the resultant heat generated by the curing of the CPB?
- What heat management mitigations would be put in place to avoid undesirable rapid curing conditions which could create long term problems in terms of chemical stability, permeability, and strength?
- What mitigations would be established to protect workers from excessive heat?

**[Heat of curing is dependent upon the cement Type. Here, we use Portland Type IV: Heat 55cal/g (note 1 cal/g == 4.184kJ/kg , 55cal/g * 4.184kJ/kg//cal/g == 230kJ/kg) (230kJ/kg x 907kg/ton == 208,610kJ/metric ton)*

Dewatering hazards are not discussed.

Upon initial dewatering, the physically sealed mine shafts such as the one under the Spring Hill Drive business will potentially experience a negative air pressure as the water level drops. The revised DEIR must address the structural impacts on existing infrastructure resulting from dewatering.

Grp 8-51

- How fast will the water level drop, and what volume of replacement air per hour would be necessary to equalize with atmospheric pressure within these sealed mine features?
- How will air enter the shafts as the water drops?
- How will this impact potential surface structures?
- Were the additional net load forces upon the sides and top of the shafts taken into consideration?

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The DEIR does not address potential riparian and surface water impacts from physical closure of the East Eureka Shaft.

Grp 8-52

East Eureka Shaft and the East Eureka Drain are located under an existing building near Wolf Creek. Will work to physically close the Shaft precede the dewatering? If so, will construction be conducted underwater and/or below Wolf Creek top of bank?

When the water level in the mine workings is located near the ground surface, the drawdown of groundwater within the mine workings may increase the potential for settlement or collapse of shallow workings that were not formally closed. These issues are discussed in "DEIR Appendix H.6_Geotech Review of Near-Surface Features.pdf".

Potential impacts from dewatering could affect five mine shafts or mine features that are listed to be investigated and closed before dewatering begins: the East Eureka Shaft and the East Eureka Drain at 815 Idaho-Maryland Rd, the Idaho Drain Tunnel, the Idaho Pump Shaft, and the Idaho Shaft at 865 Idaho-Maryland Rd. These closures would affect businesses located above or near these mine features. The work at 815 Idaho-Maryland must take place under the Navo & Sons business building. The mine feature at 865 Idaho-Maryland Rd is in the middle of an operations yard.

Grp 8-53

The mine water levels at the five identified mine features are near the top grade and close to Wolf Creek. The DEIR fails to adequately describe the phasing of this repair work and does not disclose whether this work would impact water quality within Wolf Creek or its habitat. For example, in order to work on repairing, lining, and capping the East Eureka Shaft under the Navo & Sons building, either the work must be done underwater or the mine would have to be partially drained. Per DEIR Appendix H.6, "*The likely course of action will be to over-excavate surface soil in the areas of these features to determine where competent, native soil/rock is located and attempt to identify the trend of any subsurface mining-related structures (i.e. tunnel, shaft, drift, etc.).*"'

The mine water level is only slightly above Wolf Creek's normal flow levels and the mine drain is below the top of the bank. Some or all of the work is within the high water level of Wolf Creek. These conditions could result in environmental impacts but the DEIR provides too little information to understand the severity and extent of these impacts. The revised DEIR must provide the following information:

- Would the work be done before any dewatering of the mine and hence be underwater?
- Much of this work would be below the level of Wolf Creek. If work is done before partially dewatering the mine, how would concrete placement be achieved without interaction with the mine water discharge into the creek?

Grp 8-54

- If the work is done after partial dewatering of the mine, how would the risk of subsidence be mitigated, given that the repairs are prescribed to take place before dewatering in order to prevent subsidence.

Grp 8-55

- What are the required permits for work within a watercourse? None are listed.

Grp 8-56

A revised DEIR must specify how repair of the East Eureka Shaft (and the other near surface mine features listed) would proceed and include mitigation measures to protect Wolf Creek and the properties near to the proposed repairs.

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Hydrology

Water quality related to cement backfill toxic discharge in mine water is not discussed.

Grp 8-57

The project plans to dispose of 500 tons/day of sand tailings back into the mine using Cement Paste Backfill (CPB). The use of cement and CPB could have serious effects on water quality, yet the DEIR does not analyze these impacts. Long term potential effects from CPB and leaching must be analyzed. The DEIR fails to identify the quantities of cement, or ratio of cement to sand tailings and fails to evaluate the potential short term and long term impacts on water quality.

Cement can contain hexavalent chromium, which is a toxic and carcinogenic substance that has been known to leach from cement in concrete, causing groundwater pollution. Safeguards to prevent the use of cement containing hexavalent chromium must be provided. How will this be accomplished?

The DEIR must be revised to provide a comprehensive analysis of the environmental impacts associated with the use of cement and CPB.

Assessments of the current mine water chemistry are inadequate.

The Hydrology Report (DEIR Appendix K.2, Table 4-10, p120) uses discharge screening limits and data from the New Brunswick shaft to define water treatment criteria. However, a more accurate sampling of mine water would be from the drains located along Wolf Creek rather than from the New Brunswick shaft, as described in the analysis of mine water flow (see DEIR Figure 4.8-7), which shows water entering the New Brunswick shaft then flowing downward through the extant mineworks to exit the drains at Wolf Creek (Eureka drain, East Eureka drain, etc.). Only a few samples taken from the drains were reported, but these samples are much more representative of the mine water chemistry and indicate higher levels of Iron, Manganese, Arsenic, Aluminum, and Zinc than the New Brunswick shaft samples (DEIR K.2 Tables 3-6).

Grp 8-58

In order to get an accurate assessment of the contaminants flowing out of the mine under varying conditions, regular testing must be conducted over time at the Mine drains. The testing must also be conducted seasonally during differing rates of outflow. Moreover, in order to provide the public with a conservative estimate of potential impacts, the DEIR should use the results from the drain samples rather than the New Brunswick shaft, which would show potential water quality impacts from higher level of metals, arsenic and zinc.

Additionally, because the water flowing out of the drains probably only comes into contact with a small portion of the 72 miles of mine tunnels, current drain water does not likely represent the chemistry of the mine water that will be pumped out once dewatering begins. The DEIR should be revised to provide a comprehensive evaluation of the current mine's water chemistry. As part of this analysis, the following questions/issues must be addressed.

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Grp 8-59

- Are there potential impacts from existing timbers and shoring on mine water quality?
- Were treated or rot resistant wood products used in the mine at any time?
- How has existing water quality been affected from the miles of pipelines, ore carts, rails, wiring, equipment, spilled oil products, chemicals and other miscellaneous materials which may have been left in the mine works?

Grp 8-60

A list of expected materials based upon historical records should be provided, and an assessment of risk, potential for contamination of the mine water, and a plan for their disposal provided.

- If detected, how will oil products be removed from mine water?
- If detected, how will Mercury and other contaminants be removed?
- Will the treatment facility have to be modified for any of the potential contaminants?

Grp 8-61

In previous operations up until the mine closed in 1956, a significant volume of mine waste or tailings was disposed of by backfilling the mine stopes. Water contained in backfilled stopes needs careful analysis due to potential leaching of contaminants when dewatering takes place. The amount of water is approximately 25 million cubic feet, or about half of the total mine water volume. This is a significant possible source of water contamination. The finely ground materials have been subject to oxidation already, they have been submerged for 75 years, and now would be subject to oxidation again as water levels drop, creating an increased potential for leaching of metals and metalloids. In addition, residues from ore processing such as mercury may be present. As the mine is dewatered, frequent regular testing of discharge must be done. The revised DEIR must provide the following information in order to evaluate the project's impacts:

- What plans are in place to test mine water as it is pumped out?
- How often will tests be conducted?
- What is the policy for ceasing or modification of pumping operations in the event of unexpected issues with water quality?

Additional analysis of the issues described above must be conducted to ensure an adequate understanding of these impacts which are potentially significant and unavoidable.

Grp 8-62

Most of the samples that were tested to determine potential water quality impacts are unreliable.

As detailed in "Sample QC Review", attached as a reference to this document, the environmental sampling data that was collected for determining potential water quality impacts fails to meet quality assurance standards, rendering the results unreliable. Most samples were received past hold times, and various samples were mishandled, mis-dated, submitted with temperatures exceeding the guidelines, and/or in too small a quantity to be measured. As a result, the consigned laboratories have denied certification of the data in several critical categories. In spite of this, the inadequate and often uncertified data was used in multiple consulting reports without any notation as to the validity of the compromised data.

For example all of the rock, tailings, soil, etc. samples that were used for the metals analyses were beyond their 6 months hold times, seemingly by at least 9 months, but records are inadequate. All 47

samples submitted to ACZ Laboratories were notated as "samples were received and analyzed past hold time." The bulk of the results were not offered for certification.

Grp 8-63

Findings regarding water quality, air quality, and hazards that are based upon this data are unreliable. Conclusions based upon this data must be reassessed based upon reliable sampling and analysis.

Drill core testing for water quality impacts is inadequate.

Given the size and scope of the proposed Project, there was an insufficient quantity of drill core rock analyzed to determine the mine's true impact on water quality.

By way of illustration, between 2017 and 2019, the applicant drilled for, and extracted, a total of 67,500 feet of rock core. But of these 67,500 feet of drill core, only 0.68% were submitted for analysis. And of the few samples that were submitted for analyses, a dearth of information is provided regarding the sample materials' true weight, volume, particle size, and sampling technique. Nor are the drill logs for these core samples available for review, so the actual dates, precise locations, drift angles, widths, final depths, etc. are unknown. Several times the DEIR refers the reader to a "separate report" which will explain some of these omissions, but no such report is found in the document or its appendices.

Grp 8-64

In addition to the limited sample size and the inadequate sampling details, four different labs were employed to carry out the analyses of the submitted samples, but the samples did not have a proper chain of custodies (COC) processes. The COC is a process that tracks the movement of samples through their collection, safeguarding, and analysis lifecycle between the mine applicant and the labs, but the COCs do not reflect the written account found in the DEIR.

The revised DEIR must provide an explanation for the discrepancies in the chains of custodies for the samples submitted to labs and provide evidence that the samples are scientifically reliable

This insufficient and unreliable data affects the accuracy of any analysis based on this data, such as an analysis of the metal leachate content of rock. Since metal leachate from mine rock affects water quality, analyzing metal leachate is one of the key concerns regarding the rock tailings produced by the Project. The limited amount of core material sampled and the imprecise manner in which the details of the core samples are reported makes the metal leachate analysis unreliable and leads the DEIR to underestimate potential impacts.

The revised DEIR should include a full set of data and drill logs that can be reliably analyzed by the public.

Drill core testing for airborne contaminants is inadequate.

Grp 8-65

As documented in "Sampling Procedures" (Sampling) (attached as a reference to this letter), TACs silica and asbestos are insufficiently described in the DEIR. Even though several hundred tons of rock would be mined and surface-stored each day, none of the core samples taken from the exploratory drill cores were tested for the contaminant silica. It also appears that when the original core samples were taken, drilling was stopped when serpentinite, an asbestos bearing rock, was encountered and, since drill logs are not available for review, the depth and width of the asbestos-containing serpentinite deposits encountered cannot be determined.

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The rock types identified in the mineralized zone contain substantial amounts of silica (silicon dioxide, quartz), and the tailings would contain fine particles of respirable crystalline silica, a TAC. The laboratory that the applicant used for all metals analyses, ACZ Laboratories, is certified to perform both silica and silicon dioxide tests yet not a single sample was analyzed for these parameters (Sampling).

The revised DEIR should provide a full set of data about the samples analyzed for silica and asbestos. To the extent this data set fails to analyze silica and asbestos, further analysis and revisions of the DEIR are required to adequately identify impacts.

The hydrology study incorrectly assesses the potential for long term acid mine type drainage.

The Empire Mine, adjacent to the Idaho-Maryland Mine, provides clear evidence of the potential for contaminants that could be discharged from the Mine and from tailings and mine waste intended to be deposited on the surface or back within the Mine as backfill. Mine water discharged from the Empire Mine has excessive levels of arsenic, iron, and manganese.

The EMKO hydrology study used in the DEIR dismisses the potential for acid drainage which could affect water quality in Wolf Creek. Instead, the DEIR claims "Any acid generated during the oxidation would be quickly neutralized by the carbonate minerals in the host rock" and cites neutral or high (non acid) pH values. (DEIR 4.8-49, 50) However, the short term method used by EMKO is not a reliable method for predicting the long term potential for contaminants to be discharged from mine waste. Results would be more reliable using long term tests, on the order of months rather than hours or days.

Grp 8-66

The waste rock's potential to produce poor quality effluent should be thoroughly characterized using appropriate tests to the satisfaction of the Water Board (e.g., ASTM D 5744) over a sufficient period, also to the satisfaction of the Water Board (e.g., 40 weeks).

Accordingly, more extensive testing of mine waste rock and tailings must be conducted to assess the potential for contaminant leaching from mine waste. Long term dynamic testing must be conducted to accurately identify potential impacts to water quality. Due to variations in geology as mining progresses, repeated testing of the mine waste must be done.

The revised DEIR must specify how long-term monitoring of acid mine type drainage would be accomplished and identify mitigation measures capable of ensuring that any unanticipated contaminants do not adversely affect water quality. Without providing such testing and identifying feasible and effective mitigation measures, the impact must be identified as significant and unavoidable.

It is not adequate to defer analysis of mine waste, a potential hazard, to some future date without providing substantial evidence that the proposed actions will not result in environmental impacts.

Grp 8-67

The mine waste has not been adequately tested and one must conservatively conclude that it has a high potential for causing water quality impacts, given that similar local historic mining activities resulted in

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the detrimental environmental impacts that persist today. The DEIR fails to conduct the necessary impact analysis. Instead the document asserts that impacts will be remedied by obtaining an expedited General Order permit from the Water Board (DEIR section 4.8 page 50). As Baseline points out, this process is insufficient:

"It is not adequate to state that the project will get permits without providing substantial evidence that the proposed action will not result in environmental impacts, particularly when very similar historic actions have been demonstrated to result in environmental impacts that have persisted for decades." (Baseline)

The revised DEIR must provide a valid and reliable analysis of the mine's waste products and identify specific and achievable mitigation measures to assure these water quality impacts are reduced to less than significant levels. Alternatively the revised DEIR must identify such impacts as significant and unavoidable.

No provisions were made with respect to treatment of mine effluent beyond the 80 year project operations.

Water treatment would need to continue in perpetuity after the mine stops. Current discharges have exceedances in Arsenic, Iron, and Manganese that would likely continue in perpetuity The DEIR must address potential water quality impacts and how water treatment would be accomplished after the mining operations cease.

Grp 8-68

The natural outflow is at Wolf Creek at an elevation of about 2650 feet elevation. Natural mine water level at Brunswick site is approximately 250 ft below the surface. Treating the water at the Brunswick site and discharging into SFWC requires at least a 250 foot lift.

- After mining operations cease what would be the provisions for long term treatment?
- What would be the long term energy demands?
- Where would the treatment facility be located after mining operations cease?
- What will be the biological and hydrological impacts from the changes in mine water discharge upon ceased operations?

In order to fully evaluate the Project's water impacts, these questions must be answered.

Hydrology - Groundwater

The proposed project would intentionally affect local groundwater resources.

Grp 8-69

The proposed Project would significantly affect local groundwater resources by dewatering the mine, lowering groundwater levels. The dewatered groundwater resources would be converted to surface water that is discharged into existing creek channels and quickly conveyed out of the area. The applicant's consultants have prepared a numerical groundwater model to attempt to predict how this proposed long term dewatering effort would affect overlying and surrounding groundwater levels.

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An incorrect assumption was made in the groundwater model used to predict dewatering impacts, which led the DEIR to significantly underestimate groundwater drawdown, both in magnitude and areal extent. The groundwater model was calibrated based on pumping rates from the historical Idaho Brunswick Mine and only one water level measurement collected from the flooded (i.e., inactive) Union Hill shaft in 1956. Using only one water level measurement from 64 years ago to calibrate a complex bedrock aquifer system over a large region is inappropriate and introduces a significant amount of uncertainty to the model. (Baseline)

The revised DEIR must rely on a corrected groundwater model in order to accurately predict the extent of the well drawdown caused by the predicted 80 years of mine-dewatering and dewatered maintenance. Based on existing reports, the Project is likely to impact significantly more wells than the number of wells identified in the DEIR. (see "Safeguards for Well Owners and the Idaho-Maryland Mine", CEA Foundation) This is a significant impact that will affect hundreds of Grass Valley residents and must be addressed in a revised DEIR.

The basic constructs of the DEIR's groundwater model have significant errors and omissions, making them unreliable.

The basic data needed to build a valid groundwater hydrological model are missing. The document "Review of the Idaho-Maryland Mine DEIR Groundwater Model" (Model Review) by Silberstein examines deficiencies in the model, as summarized here.

Grp 8-70

The mine water drains from several locations along Wolf Creek near Centennial Drive, and the DEIR provides only rough approximations of the mine water outflow rates from these areas. What's more, these outflow data are contradicted by more reliable records from previous studies which indicate ten times more outflow than the amount the DEIR discloses. (Model Review) Similarly, mine water inflow analysis is based on sparse mine water level data from the New Brunswick shaft. Only 12 water level measurements were taken at random times of the year between 2003-2007, and just 3 measurements in 2018-19). In addition, the utility of these measurements is incorrectly interpreted. The water level reaches a limit when it exceeds the level of the drains from which the mine water flows and doesn't reflect what could be substantial inflow. Without a measurement of the outflow, the amount of inflow cannot be determined by the water level in the New Brunswick shaft. Essentially, no water balance assessment is provided.

Furthermore, data from private wells within the area is old and limited to just a few years. No usage data is provided, so seasonal variations in water levels are of limited use.

Critical data such as reduction in groundwater recharge from precipitation are also incorrectly calculated, failing to include the 75 acres of low-permeable mine waste to be dumped on the two sites.

Moreover, the groundwater model does not include the new access shaft, which would create a local area of groundwater drawdown. In fact, it appears that numerous existing mine features that are within a few hundred feet of the surface were also not evaluated in the ground water model. These mine features would contribute to the downward transmission of ground water from the near surface fractured rock areas.

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These are all elements that are critical for constructing a reliable groundwater model to identify dewatering impacts.

Grp 8-71

In addition, there are three major faults and numerous minor faults in the mineral rights area. These impact the transmission of water and introduce a high level of uncertainty in the accuracy of a model which, as stated in the Groundwater Model report (DEIR Appendix K.3), assumes the geology is homogeneous. Common assumptions such as the correct anisotropic ratio for the groundwater transmission calculations may not be accurate.(Model Review, 3.g.)

Taken together, the groundwater model is seriously deficient with respect to data reliability, initial conditions, and modeling assumptions, calling into question its ability to accurately depict the Project's impacts.

Grp 8-72

Finally, use of modeling in a fractured rock system has limited value. Modeling that relies upon uniform rock, which is consistent from place to place, behaves in a more predictable fashion than rock that is in bedrock systems having multiple faults and irregularities. It is critical to provide for long term monitoring and extended protections due to the challenges inherent in modeling groundwater in this complex hydrogeologic setting.

The revised DEIR must provide accurate and adequate information and comprehensive analysis to determine the extent and the severity of the impacts upon groundwater resources and wells. Without this analysis, the revised DEIR must identify such impacts as significant and unavoidable.

The DEIR inappropriately defers the collection of additional water monitoring data to the future.

Grp 8-73

The DEIR acknowledges that more groundwater level data is needed to assess the potential impacts of the proposed Project on groundwater levels. Mitigation Measure 4.8-2(a)(4) (DEIR section 4.8 page 67) states that this needed water assessment be conducted "once dewatering of the underground mine workings commences." This is internally inconsistent and would not be achievable. Once dewatering begins, it will be impossible to measure baseline levels. Consequently, this mitigation measure is impossible to implement. Mitigation measures under CEQA must be achievable, enforceable, and must be capable of actually reducing the Project's impacts.

The DEIR inappropriately defers the collection of additional data (via a Groundwater Monitoring Plan) to the future. CEQA does not allow the deferral of important studies necessary to characterize impacts because it denies decision-makers the information they need to make well-reasoned decisions regarding the viability and impacts of a Project.

Groundwater monitoring networks will need to be established in advance of the Project, and the resulting data will need to be included in the revised DEIR. The consequences of not committing to full compliance with General Plan Policy 2.17 are dire for local property owners who rely on groundwater. (Baseline)

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Hydrology Modeling

Hydology Model Initial Condition Issues

Dr. June Oberdorfer, Certified Hydrogeologist and Professional Geologist, reviewed the Ground Water Model and related hydrology documents for the Project. (See "Comments on Itasca GW Modeling Oberdorfer.pdf", attached as a reference to this letter.) Several key assumptions were identified in the model which minimized the groundwater drawdown results. For example, an incorrect assumption was made for the initial water levels for the model. As described,

Grp 8-74

"Rather than taking present day water levels as the starting point for predicting the effects of mining for 25 years starting in 2019, they chose to use the water levels at the end of mining in 1956 (Sec. 5.1). Those water levels don't reflect the fact that there's no current dewatering, but rather reflect dewatering at a rate of 700 gpm."

As a result, Dr. Oberdorfer concludes:
"This incorrect assumption minimizes both the magnitude of drawdown shown on the Figure 5-7 and the extent of the area affected. In addition to underestimating the number of domestic water supply wells impacted and requiring mitigation, this assumption also underestimates the extent of the area requiring groundwater monitoring (Itasca, 2020b). That area needs to be expanded."

The revised DEIR must re-evaluate the area of potential groundwater impacts.

Inflow and Transmissivity

The groundwater model was created to simulate potential impacts to wells and groundwater levels. One of the key factors in modeling the groundwater is a determination of how readily water is transmitted from the surface into the mine. An analysis of water levels in the New Brunswick Shaft and possible correlations between precipitation was undertaken but it is flawed in several ways, further calling into question the basis for the groundwater model.

Grp 8-75

The analysis failed to consider that the level of the water in the New Brunswick Shaft had an upper limit because the water was flowing out of the drain, thus hiding potential increases in mine water inflow. Sparse data and poor granularity of data further undermine the utility of the New Brunswick Shaft water levels and corresponding precipitation amounts.

In addition, well monitoring was conducted in 1995-2001, 2003-07 (DEIR Appendix pg 4.8-11). Well log records show seasonal variability but no data is provided that shows how much of the well water level changes is due to irrigation season water usage and how much is a reflection of the actual lowering of the ground water level overall. No recent well monitoring was conducted during drought years, and no assessment was made on the long term predicted impacts of climate change. These impacts include warmer weather, changing rainfall amounts, shifting of rainfall periods, as well as consideration of water usage changes by property owners due to drought

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The following minimal steps are necessary to accurately model the Project's groundwater impacts:

- Year-round logging of mine water levels and outflow should be collected. Data should be collected for several years, including at least one year with normal rainfall and one year each with low and high rainfall, in order to establish a baseline for groundwater modeling and impact assessment.

Grp 8-76

- The data from the outflow and the data showing changes in mine water level should then be compared with granular rainfall data to assess the amount of seasonal variation in mine water inflows. The data could then be used to provide an estimate of transmissivity from the surface.
- Adequate wells data should be collected. The wells data is old, limited to a few years, and lacks information about well water consumption. A comprehensive well monitoring program including water level and water comsumption must be established.

Grp 8-77

- If the mine is approved, monitoring must continue throughout mining operations and at least 5 years after the mine is closed and reflooded.

Groundwater Model Elements

A new access shaft is proposed close to the creek, but a cone of depression of groundwater levels like the one indicated at the New Brunswick Shaft is not shown in the DEIR. The failure to show this brings into question whether the new shaft is actually included in the DEIR groundwater model and subsequent analyses. The revised DEIR should provide the following information:

Grp 8-78

- Was the new access shaft included in the Itasca groundwater model? If so, what is its precise location? The shaft should be located on all maps.
- How far is it from South Fork Wolf Creek, a perennial stream? Is it within 100 ft?
- Was there analysis of the impact of the groundwater caused by the significant 50 ft deep excavation needed to build a permanent access shaft? If so, which specific pages of the DEIR provide this analysis?
- Will the new access shaft lead to more drawdown of near surface groundwater?
- How will the creation of a large excavation and a new access shaft impact the near surface ground waters that feed SFWC?

Grp 8-79

The model assumes that the areas to be mined will be confined to very limited areas at depths greater than 1000' (DEIR Appendix K.2, pg x, xi). However, the mineral rights provide no restriction to mining anywhere within the 2585 acres and to within 200' of the surface. No conditions are imposed to guarantee that the mine applicant doesn't drill, excavate, or mine above 1000 ft from the surface, which would invalidate the assumptions of the groundwater model.

Grp 8-80

The model simulations were constructed based on an assumption that mining would occur for only 25 years. From page 23 of "Appendix K.3_Groundwater Model Report" by Itasca: "The predictive numerical simulations were conducted to assess the potential inflows to the mine workings, the effect on nearby domestic wells, and the potential effects on the creeks in the Mine area during mine development and production between the assumed years of 2020 and 2045 (Year 1 to Year 25), which is the current mine plan." The model was subsequently extended to simulate an additional 40 years, providing a 65 year total run time. The model was not run for the full 80 year term of the proposed Project Use Permit.

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All computer models that attempt to simulate real world conditions are based upon assumptions. Even minor differences between input data and actual real world conditions can result in errors that increase exponentially over time. The longer the computer model is run, the greater the potential for deviation from actual outcomes.

The DEIR should justify the additional run times of the groundwater model, along with an analysis of the reliability of the model over such an extended period of time.

All of these issues must be resolved in the revised DEIR.

Wells and Well Mitigations

Relying on fifteen monitoring wells to estimate the impacts on all water supply wells around the mine area is inadequate.

Grp 8-81

The DEIR relies on fifteen monitoring wells to estimate impacts on water supply wells but it does not explain how it arrived at this number of wells or their location. In complex fractured bedrock spread out over thousands of acres, monitoring water levels at fifteen locations could not possibly provide the needed data to ensure that groundwater impacts to hundreds of existing water supply wells in the Project vicinity are immediately identified and mitigated. (Baseline,p12)

The revised DEIR must provide reliable data regarding the Project's monitoring regime in order to provide an accurate accounting of groundwater impacts.

Potential impacts to wells are underestimated and proposed mitigations are inadequate.

The DEIR relies on a Well Mitigation Plan to allegedly protect wells from mining impacts. The Nevada County General Plan (Policy 17.12) item 1) states that:

"*In approving mining projects which* ***according to expert opinion*** *may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses:*

Grp 8-82

1) The County shall require the operator to guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water. "

In contrast to the opinion of the DEIR consultant EMKO (DEIR Appendix K.9, p1), numerous experts have stated that there is the potential for a significant threat to water supply for wells in the area beyond those identified in the DEIR. Notably, Baseline Engineering unambiguously states that, "*...it is Baseline's expert opinion that the project may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses in a much wider area than is indicated in the DEIR.*" (Baseline)

The DEIR relies on a Well Mitigation Plan to purportedly protect wells from potential mining impacts. Yet, the Well Monitoring Plan does not demonstrate that impacts would be mitigated. The Well Mitigation Plan is an aspect of the DEIR which designates protections for wells from potential mining impacts. The Nevada County General Plan states that if expert opinion indicates that there may be a

threat to the quality or quantity of water that supplies domestic wells, then the mine operator must provided an immediate and comparable supply of water, and will be held accountable for all expenses incurred unless the operator can prove that they are not at fault.

The Well Mitigation Plan asserts that, "*Expert opinion has determined that there is no threat to water quality to domestic water wells...*" and that, "*Domestic wells outside [the E. Bennett Road] area will not be impacted.*"

By stating such, the mine applicant is downplaying the Project's impacts on area wells so that he can avoid having to comply with most of the County's Well Mitigation requirements.

Outside experts have determined that the DEIR's hydrology model is unreliable because there were so few well-monitoring measurements collected and because the quantity of data-input was insufficient to calibrate any reliable conclusion. As one expert noted,

"*Even a well-calibrated model has a large uncertainty in its predictions. It turns out that this model [Rise'] is not well calibrated, so the uncertainties are almost certainly larger [than the norm].*"

Grp 8-82

Six of the experts who have assessed the potential threat to local wells from mining activity repeatedly emphasized the uncertainty of the predictability of the mine's impact to domestic wells.

Given the opinion of outside experts, it is imperative that well owners both within and beyond the area of mineral rights owned by the mine applicant be guaranteed an equivalent, uninterrupted, permanent, quality of water, supplied and paid for by the company in advance of any mining operations.

The DEIR must be revised to provide an adequate analysis of impacts to wells. Once this analysis is provided, the applicant and the County will be in a better position to identify feasible and effective mitigation for these impacts. As a first step, the revised DEIR must accurately define the area of potential impact to domestic wells. The revised analysis must provide the quality and quantity of data needed so that the hydrological model can calibrate a more reliable prediction of threat. The data collected must cover all the seasons (over an extended period of time), and include a large enough quantity of representative wells - over a long enough period of time – to establish a baseline usage of the wells in all the neighborhoods whose wells could be threatened by mining activities. The monitoring should be managed by a qualified and independent third party.

Then a fair and accurate domestic well monitoring program must be designed and implemented. This well monitoring program must include full financial assurances covering all well owners in the area that addresses bonding, warranties for NID services, damage reimbursements, etc. Additionally, a community relations program should be established to handle any problems that might emerge over the eighty year permit being requested.

Hydrology - Surface waters

Grp 8-83

Mine water discharge will overheat the South Fork Wolf Creek.

Mine water temperature ranges between 14 and 15 degrees Celsius. The Project must not change the temperature of water discharged into the South Fork Wolf Creek by more than 5 degrees Fahrenheit (2.8C) per NPDES requirements. (DEIR Appendix K.2, p108) Water from the mine will be pumped into the seven acre treatment pond. From there it will be run through the treatment facility and discharged into the creek. The DEIR's Hydrology study provides only a few data points (April and August of 2019 and Jan 2020) to determine the range of values for the creek flow and temperature, reporting lows of 9 deg F in the winter to 15 deg F in late summer (DEIR Appendix K.2, pg 108).

However, over 15 years of monitoring by (WCCA) provides data indicating that the temperature of the creek often falls substantially below 10C, and that these temperatures commonly occur during low flow times.

The revised DEIR must include studies that reliably predict the mine water's outflow temperatures from the treatment pond into SFWC. To do this, the EIR must include thermal modeling of the treatment pond, including the temperature impacts due to the treatment processing plant, flow through rates, cooling under different weather conditions, solar gain, evaporation, precipitation, etc. In order to avoid impacts to the SFWC and the species that inhabit the Creek, the revised DEIR must demonstrate that the discharge temperature and flow rates, combined with the temperature and flow rates of the stream over a range of conditions would not result in temperature changes in the stream in excess of 2.8C (5F) degrees.

Grp 8-84

The Hydrology report states that:
"*During the winter and early spring, the temperature of the water in the mine would be more than 2.8 degrees C warmer than the creek. However, after being pumped from the mine, the water would be stored within a surface pond before treatment and discharge. During the winter and early spring,* ***the ambient temperature should cool the water in the pond****. In addition, the rate of discharge would be less than the typical flow rates in South Fork Wolf Creek during the winter and early spring, such that the discharge* ***should not alter the temperature in the creek by more than 2.8 degrees C****. Therefore, the discharge would comply with the temperature criteria in the NPDES permit.*" (DEIR Appendix K.2, pg 108)

The section of the Hydrology report addressing creek temperatures is speculative because it is based on incomplete data. It is not sufficient to say "the ambient temperature should cool the water" and "the discharge should not alter the temperature of the creek by more than 2.8 degrees C." Advisory language such as this does nothing to ensure that resources will be protected.

Grp 8-85

The low flow periods of the stream in the fall and early winter often have low temperatures and would be potentially the worst case for temperature impacts due to mixing. This is not adequately assessed in the DEIR. The revised DEIR must address the following:

- What are the predicted high and low temperatures of the discharge from the treatment pond in all seasons of the year, and considering varying weather conditions?
- Which specific temperature scenarios were considered in the DEIR?
- What are the corresponding flow rates of the stream and what would be the resultant temperature change of the mixed waters?

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Grp 8-86

To accurately predict the outflow temperatures, the revised DEIR must conduct thermal modeling of the treatment pond, including the temperature impacts due to the treatment processing plant, flow through rates, cooling under different weather conditions, solar gain, evaporation, precipitation, etc. The document must then undertake calculations to demonstrate that the discharge temperature and flow rates, combined with the temperature and flow rates of the stream over a range of conditions would not result in temperature changes in the stream in excess of 5 degrees F.

Hydrology - Surface Waters

Impacts from using the 7 acre freshwater pond for treating minewater are not adequately assessed.

Grp 8-87

The 7 acre pond will be filled with untreated mine water. The outflow of the pond is to South Fork Wolf Creek. It has been modified to increase capacity. Currently it provides habitat for abundant waterfowl and is surrounded by riparian vegetation.

The proposed treatment process will cause Iron and Manganese to precipitate via oxidation in the pond. These oxides will accumulate. Also Arsenic and other contaminants will accumulate. Concentrations of contaminants will exceed the contaminant levels from the discharged mine water due to additional oxidation, mine water recirculation, evaporation, and treatment plant residues from backflushing. What is currently a healthy freshwater pond with good water quality and abundant wildlife will become contaminated. The revised DEIR must address these impacts:

- What will be the impact of the contaminated water on waterfowl and surrounding riparian habitat?
- What mitigation will be provided to replace the habitat and to protect wildlife from exposure to the contaminated water?

Grp 8-88

- Water for mining operations will be recirculated into the mine. How will the concentrations of contaminants in the pond be monitored to prevent addition of metal to the mine waste stream?
- Will mine workers be protected from exposure? How?

Grp 8-89

- Will water be tested to assure it will not increase the risk of future groundwater contamination when it is used in the cement paste backfill?

Grp 8-90

- What impacts will the contaminated mine water have when used for dust suppression and Asbestos management?

Grp 8-91

- Aeration of water in the treatment pond can cause odors and toxic substances to become airborne. What are the air quality impacts?

Grp 8-92

There will also be potential leaching of contaminants from mine waste that will be exported as engineered fill or sold offsite. Untreated water that may be used to control fugitive dust emissions and/or increase water content in "engineered fill" may increase those contaminants. The revised DEIR must address the following:

- What safeguards will be used to prevent additional contaminants present in the untreated water from increasing the total levels of contaminants present in the exported materials?
- How often will the water used on exported materials be tested?

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- In the event that the total level of contaminants in material destined for export exceeds the thresholds for toxic contaminants, how will the material be managed? Where will it be placed?

Periodic removal of treatment pond precipitants.

Grp 8-93

The treatment pond would be used to remove some or all of the Iron, Manganese, and other contaminants in the mine water by oxidation. Periodically, the pond must be drained and the accumulated precipitants must be removed. There are number of impacts from this process that are unaddressed in the DEIR:

What are the impacts on the surface waters from draining the 40 acre foot treatment pond?
How will the dewatering maintenance process be managed during this operation?
Will testing be conducted on the precipitants?
How will the precipitants be classified, and where will they be taken?

These impacts must be addressed in the revised DEIR.

Land Use, Zoning, Population and Housing

A variance for proximity to geological faults is not supported.

Industrial development must be located at least 200 feet from any fault line. The DEIR fails to provide a map showing the location of all of the faults and the 200 foot setbacks along with the locations of the proposed industrial buildings. A drawing showing these relative locations is necessary in order to evaluate the potential impacts of the fault (See map, DEIR Appendix H.2, Figure 1 and 2).

Grp 8-94

There seems to be an attempt to obfuscate the issue of variances by noting the location of the existing New Brunswick Shaft within the 200 foot setback. As an existing structure, a variance for use of it as a secondary access to the mine is a lessor potential impact than a variance for proposed new industrial buildings.

Pg 5 states: "Because the proposed Project includes development of industrial facilities associated with underground mining operations utilizing the New Brunswick shaft, construction within the building setback fault zone is necessary and unavoidable. There is no alternatively feasible location that would have less impact on the Site and surrounding areas."

This statement is not valid. First, the site of the historic Idaho-Maryland Mine main access and processing facilities was at the Centennial site on Idaho-Maryland Road. This would be a suitable site for the industrial facilities. In fact, it is a more suitable due to the nature of adjacent land use and fewer impacted residential properties. To further support this point, note that in 2008 Emgold Mining Corp. submitted an application to open the mine at the Centennial site, including all of the processing facilities. The Brunswick site and the Round Hole site were to be for additional access, ventilation and emergency access. Having multiple access points from different parts of the mine works also provides better emergency access and ventilation. The current proposal by Rise Gold has all of the access to the

entire mine works located at two shafts within a short distance of each other, which lacks those benefits.

Thus, the statement that "There is no alternatively feasible location that would have less impact on the Site and surrounding areas…" has not been established as valid. At the very least, evidence should be provided supporting this claim.

Grp 8-95 Furthermore, as noted in FaultingHazards, the impacts of mining will change the mass balances on either side of the faults with the potential to induce seismic activity.

Grp 8-96 This variance should be denied.

Alternative Land Uses are not adequately discussed.

Grp 8-97 The DEIR Alternatives chapter discusses only an alternative use that would result in an industrial project on the Brunswick site at maximum buildout potential. It is then dismissed for evaluation because impacts were concluded to be greater than the mine project. This is a severe inadequacy in the DEIR.

In order to adequately address project alternatives, the DEIR must discuss an alternative use that would be more likely at this site - such as a project consistent with the site zoning, not requiring a use permit, and of a scale which is designed to avoid significant mine project impacts. An alternative industrial use appropriately scaled at this site would be more likely to meet the community character and aesthetic related policies in the General Plan and result in reduced impacts compared to the mine project in virtually every impact area including visual, traffic, air quality, and noise/vibration.

Grp 8-98 The DEIR is also deficient in not mentioning or analyzing the mine project's inconsistencies with the Grass Valley General Plan. The mine project is within the Grass Valley Sphere of Influence. The Centennial site is within Grass Valley's first phase annexation area. A portion of the Centennial site is also zoned by Grass Valley for Urban Medium Density housing. The Nevada County General Plan requires the county to designate lands within the cities' Spheres of Influence consistent with the city land use designations. The county has not done this; thus the Industrial designation and the mine project's operations are clearly inconsistent with its own General Plan and the Grass Valley General Plan. Physical land use compatibility impacts (industrial uses next to medium density housing) will also result. In addition, the DEIR should evaluate the City's and the County's General Plan land use policy text and zoning texts for consistency. These are potentially significant impacts which must be discussed in the DEIR.

Grp 8-99 The revised DEIR must also determine whether the dumping of mine waste is a heavy industrial activity.

Grp 8-100 **Maps and Plans**

The Brunswick site shows a 100 ft building setback and an NID spill easement on an open creek, South Fork Wolf Creek. The map also shows a fault line. The map is dated 1987. Apparently this perennial stream was buried in a culvert since 1987, based upon the map's date.

- Was the burial of SFWC done under an authorized permit?
- What is the status of the NID spill easement?
- Have the 100 ft setback and NID spill easement been waived or reconveyed to the land owner?

Any existing easements or setbacks which may be encroached by the Project must be waived or modified by the consent of the entitled party.

Grp 8-101

What is presumably the Weimar fault, also known as the 6-3 Fault, (See https://www.risegoldcorp.com/uploads/content/I-M_Tech_Report.pdf) runs through the project site, although, surprisingly, the DEIR does not actually refer to it by name. The site map showing the Fault Line and Setback Zone (DEIR Appendix H.2, Figure 1) for this is inadequate. None of the proposed structures for the Project are shown.

Grp 8-102

A map with South Idaho Shaft precisely located and with the Pine Hill flannelbush locations shown must be provided to safeguard inadvertent intrusion into the flannelbush protection areas

Grp 8-103

A map showing the mineral rights zone and all the parcels identified by address must be provided to adequately inform the public regarding the location of residences and businesses in the area with respect to the mine.

Noise and Vibration

Nighttime noise impact is not adequately addressed.

Grp 8-104

The analysis "Acoustical Comments on Draft Environmental Impact Report, Salter Project 22-0039" (Salter) provides comments on the DEIR's analysis of the noise and vibrations for the Project.

Salter determined that nighttime noise is not adequately addressed in the DEIR. The DEIR outright dismisses the potential for noise impacts due to sleep disturbance and inappropriately excludes this consideration from the DEIR analysis. The combination of nighttime industrial activities amongst a community that currently enjoys low ambient noise levels represents a significant risk for Project noise to impact the community, annoy residents, and cause sleep disturbance.

A revised DEIR should provide a comprehensive analysis of nighttime noise impacts, identify these as potentially significant impacts, and identify appropriate mitigation, including limitations on nighttime noise, to protect nearby residents (Salter).

Engineered fill operation noise is underestimated.

Grp 8-105

The DEIR underestimates operational noise from the Project's engineered fill operations (Impact 4.10-2). This 5 to 6-year long activity could generate noise levels at least 10 to 18 dB higher than predicted in the DEIR. This is a significant deficiency in the impact analysis. As such, the project's noise levels could be 20 to 35 dB louder than current median/background ambient noise levels, causing a severe

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impact. In addition, in several instances, the DEIR fails to adequately address impacts to sensitive receptors located farther away from existing roadways that currently have a lower background noise (Salter).

These are potentially significant impacts. The DEIR must be revised to correct these deficiencies and omissions.

Blasting vibration impact is not adequately addressed.

Grp 8-106

The DEIR fails to adequately evaluate blasting vibration impacts (see Impact 4.10-4). Blasting operations have the potential to subject nearby residents to "strongly perceptible" and borderline "unpleasant" vibration on a regular basis for the rest of their lives. These perceptible and unpleasant vibrations must be considered a significant impact in the DEIR.

In particular, the DEIR fails to include crucial guidance from the U.S. Office of Surface Mining Reclamation and Enforcement Blasting Guidance Manual restricting blasting vibration during evening and nighttime hours. If blasting must be allowed at these sensitive times, the DEIR must incorporate adequate mitigation with a notably stricter limit at all sensitive receptors (Salter).

Stoping and the new access shaft construction requires noise and vibrations analysis.

Grp 8-107

In addition to the vibrations of the blasts, the DEIR fails to analyze impacts associated with long hole slope blasting, i.e. the landing impact shock from long hole stope rock falling. Long hole slope blasting has the potential to create significant shock waves.

Grp 8-108

The DEIR fails to evaluate the vibrations from the rock falls during the construction of the new access shaft. The top 60 feet of the shaft will be built from above by excavating and forming a concrete structure. The remainder of the shaft will be excavated by tunneling from below. The analysis of the construction noise for this shaft did not include blasting from below, and shock waves from that near surface blasting, and the shock waves when volumes of rock drop vertically up to 1000 feet.

Grp 8-109

The shaft excavation which is proposed to be constructed from below cannot begin until the mine has been dewatered to over 1000 feet and mine works have been restored from the New Brunswick shaft entrance to the location of the bottom of the new access shaft. In light of this information, the revised DEIR must answer the following questions:

- What is the total time that the new access shaft will be under construction?
- How long after the initiation of the site construction will this new access shaft excavation phase begin?
- How long after the initial dewatering of the Mine will the construction of the new access shaft begin?

Grp 8-110

The DEIR's Appendix M_Blasting Report.pdf recommends that "...IMM hire a blast consultant to assist with the development of a 95% confidence level equation for the site-specific ground vibration. This consultant would take the data acquired by the seismographs set-up on the mine, run a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain at acceptable levels." (DEIR 7.2, p28)

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In order to mitigate the risks of vibration impacts, this must be a requirement, not a recommendation. In addition, in order to protect the public from vibration impacts, the revised DEIR must add as a requirement or a condition of approval that the applicant cease operations if vibrations are in excess of 0.5 in/sec. Absent these additions, the impact must be considered significant and unavoidable.

Other Issues

The DEIR has not demonstrated that mine waste disposal by off site sales would be viable.

Grp 8-111

The DEIR indicates that the applicant (Rise) plans to sell waste rock on the open market if it is still being produced after the two proposed waste rock piles reach capacity (DEIR Project Description). The Regional Water Board has jurisdiction over the disposal location requirements for mine waste rock. Although the DEIR does not disclose this, the concept of selling waste rock is an unrealistic and infeasible proposal unless the Water Board has determined that such discharges would not pose a threat to water quality. Accordingly, the Project should not rely on this concept and the DEIR should identify all impacts associated with alternative disposal methods.

Even if the mine waste can be sold, the market for aggregates varies significantly by season. During rainy seasons, it may be necessary to stockpile the aggregate onsite, but there are no provisions for onsite storage in the DEIR or an assessment of impacts related to such storage. As reported by the Center for Science in Public Participation (CSP2), dispersing waste rock and other mine waste over large areas without containment often results in contamination (e.g., Calcine mercury mine tailings used for road construction in San Luis Obispo County).

Grp 8-112

The absence of provisions for temporary waste rock storage (and the associated analysis of its impact) creates strict operational constraints and potentially significant impacts on all phases of processing have not been addressed in the DEIR. The DEIR should be revised to include an analysis of these impacts.

Construction time estimates are inadequate and affect noise, traffic, air, and other impact areas.

Construction time estimates in the DEIR are contradictory and inadequate. For example, the DEIR states in several instances that the Project is estimated to have a twelve month construction phase, but also states that the construction of the water treatment facility alone would take eighteen months.

Grp 8-113

Furthermore, neither of these estimates - twelve or eighteen months - is sufficient to capture all phases of construction. As just one example, the applicant would have to complete significant grading and underground development before initiating the eighteen month construction of the water treatment facility. Similarly, the water treatment facility would have to be completed before dewatering of the mine could begin. Dewatering is a six month process. After dewatering has been completed, the new shaft for ventilation and emergency access would have to be constructed to the 1000' depth by working upwards from below. Then, before beginning any actual new mining, the tunnels would need to be restored sufficiently to allow for construction of the underground rock crushing facility. All of these activities must happen sequentially, not in parallel. Therefore, a more reasonable estimate of

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construction length for the Project would be four to six years, clearly resulting in significantly different annual and cumulative impacts than the ones identified in the DEIR.

The DEIR should be revised to provide an accurate description of each construction project, including its intended duration. This revised description must also include the sequencing of construction projects. Until this information is provided, the DEIR preparers will be unable to properly assess the annual and cumulative impacts on air, noise, traffic, aesthetics, and other resource areas.

Permits

Grp 8-114 Construction phase repairs to the 7 acre pond on the Brunswick site will require draining the pond, repairing the pond berm, and lining the pond with a membrane. Impacts to surface waters and the wet meadow below the pond must be assessed.

Grp 8-115 The Project includes a 165' tall headframe which requires a height variance. Several other buildings are over the county limit for building height as well. Consideration should be given for putting a substantial portion of those structures underground to reduce the visual impacts and mitigate the excessive height.

Conclusion

Grp 8-116 As documented throughout this letter, the DEIR lacks critical information necessary to identify all potentially significant impacts associated with a large underground mining project close to a populated area. The Adocument lacks he DEIR lacks an accurate project description, relies on an incomplete baseline for evaluating the project's environmental impacts, lacks data and analyses needed to make informed determinations, underestimates or omits impacts and fails to provide effective and feasible mitigation measures. For these reasons, the document is inadequate under CEQA. The DEIR must be revised accordingly and recirculated.

**This document was produced by the contribution of the CEA Foundation Research Team, including Barbara Rivenes, Bill Lawrence, Dianna Suarez, Don Rivenes, Gary Griffith, Gary Pierazzi, Greg Thrush, Isabelle Langone, Jeanne Wilson, Jillian Blanchard, Jonathan Keehn, June Oberdorfer, Laurie Oberholtzer, Mike Shea, Pam Heard, Paul Schwartz, Ralph Silberstein, Ray Bryars, Rhea Williamson, Robert Hubbard, Suzanne Smith, William Clark, and others.

References

Grp 8-117 Documents attached as a reference to this letter:

- Review of the Idaho-Maryland Mine DEIR Groundwater Model.pdf
- Grp 8-118 Comments on Itasca GW Modeling Oberdorfer.pdf
- Grp 8-119 MineExhaustMoisture.pdf
- Grp 8-120 FaultingHazards.pdf
- Grp 8-121 ASUR Plan Analysis.pdf
- Grp 8-122 Health Risk Assessment Critique.pdf
- Grp 8-123 Sampling Procedures.pdf

Grp 8-124 Documents cited and submitted under separate cover:

- Baseline Environmental Consultant Report, Feb 15, 2022 (Baseline).

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Grp 8-125
Grp 8-126

- Salter Report, March 9, 2022 (Salter).
- Comments on the Idaho-Maryland Draft EIR - 16Mar22, Center for Science in Public Participation.

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June A. Oberdorfer, March 27, 2022

Comments on Groundwater Modeling, Idaho-Maryland Mine

Documents reviewed:

1) Itasca Denver, Inc., March 2020a, *Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine.*
2) EMKO Environmental, Inc., March 2020a, *Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
3) EMKO Environmental, Inc., March 2020b, *Appendices, Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
4) Itasca Denver, Inc., December 2020b, *Groundwater Monitoring Plan, Idaho-Maryland Mine Project.*

Concerns:

Grp 8-127

Simulations by Itasca (2020a) of the effects of mine-dewatering produced a map of predicted drawdowns after 25 years of dewatering (Figure 5-7). The contours of equal groundwater drawdown in this figure show a maximum drawdown of approximately ten feet and the extent of drawdown over one foot approximate the limits of Rise Gold's mineral rights. This figure was reproduced by EMKO (2020a) and served as the basis for determining which private wells would experience excessive drawdown and thus need to be mitigated with a supplemental water supply from the Nevada Irrigation District.

An incorrect assumption was made in the running of these future predictions of mining impacts which led to a significant underestimation of groundwater drawdown, both in magnitude and areal extent. This assumption needs to be corrected to get both a more accurate prediction of the extent of the well drawdown caused by the predicted 25 years of mine-dewatering and a more accurate determination of the number of wells needing to be mitigated with supplemental water supply.

The computer model was calibrated to match historic dewatering rates (700 gallons per minute [gpm] toward the end of historic mining in 1956) and one groundwater measurement taken from near the end of the historic mining period at the Union Hill Mine shaft (a small mine that had been inactive for many decades). These calibrations are reflected in Figure 4-7 (Itasca, 2020a). The lower part of this figure shows a hydrograph (water elevation versus time) for simulated water levels within the New Brunswick Mine for the 700-gpm dewatering rate. Simulated water levels in the mine were around 1,150 feet above mean sea level (ft amsl) at the end of historic mining and recovered rapidly to about 2,500 ft amsl after the cessation of mine-dewatering.

The top portion of Figure 4-7 (Itasca, 2020a) shows a hydrograph of the calibration to the historic water level measurement in the Union Hill Mine shaft at the end of mine-dewatering when the water level was approximately 20 feet lower than at present. In order to calibrate to this

one historic water level, Itasca had to insert a very low permeability barrier next to the Union Hill Mine into the model to create sufficient hydraulic isolation of the Union Hill Mine from the much lower water levels in the adjacent area. The hydraulic isolation of this Union Hill Mine area is supported by the fact that the current water levels in its shaft are about 165 feet higher than water levels in the New Brunswick Mine.

What is not known, other than at this one point in the Union Hill Mine, are the shallow groundwater levels in 1956. Itasca (2020a) does not present a map of groundwater drawdown for 1956 (as they do for the predictive modeling of 25 years into the future). Those simulated water levels in 1956 would provide important insights into what future water levels during mine dewatering would be and should be presented.

The water level in the Union Hill Mine shaft is shallow, and it is quite likely that the drawdown in 1956 in the shallow groundwater to the west (in the vicinity of the New Brunswick Mine) was significantly greater than the 20 feet observed at the Union Hill Mine, probably on the order of or greater than the 165-foot water level difference observed at present. Water levels to the west could have been on the order of 185 feet or more lower than present (20 feet plus 165 feet). It is a major shortcoming of Itasca's modeling report that they do not provide a drawdown map or hydrographs of the effects of historic mine-dewatering on the shallow aquifer.

Grp 8-128

The incorrect assumption that was made in the predictive modeling of future 25 years of mine-dewatering was in the initial condition (starting water levels) for that predictive simulation. Rather than taking present day water levels as the starting point for predicting the effects of mining for 25 years starting in 2019, they chose to use the water levels at the end of mining in 1956 (Sec. 5.1). Those water levels don't reflect the fact that there's no current dewatering, but rather reflect dewatering at a rate of 700 gpm. The incremental drawdown from increasing dewatering from 700 gpm to the future rate of 900 gpm is what is reflected in the map of impact (Figure 5-7, Itasca, 2020a) used to determine the area requiring mitigation by Rise Gold. Examining the predicted drawdown in Figure 5-7 in the vicinity of the Union Hill Mine, it would be expected to be greater than the historic drawdown measured of 20 feet if dewatering has increased over the historic rate. With drawdown being proportional to pumping rate, the drawdown would be expected to be on the order of 25 feet in the vicinity of the Union Hill Mine. Instead, drawdown in this area is on the order of a few feet (Fig. 5-7). Drawdowns further to the west in the vicinity of the New Brunswick Mine should be considerably greater than 20 feet, which they are not. This reduced drawdown compared to what was observed historically is the result of the incorrect assumption for the initial condition for predictive modeling.

Grp 8-129

This incorrect assumption minimizes both the magnitude of drawdown shown on the Figure 5-7 and the extent of the area affected. In addition to underestimating the number of domestic water supply wells impacted and requiring mitigation, this assumption also underestimates the extent of the area requiring groundwater monitoring (Itasca, 2020b). That area needs to be expanded. If the effects on dewatering on the discharge to nearby streams were calculated similarly to the effects on groundwater drawdown, then the amount of decrease in groundwater discharge to adjacent streams could be underestimated as well.



Grp 8-130

Itasca should clarify the results of their simulations by producing:

1) Both a groundwater drawdown contour map and a groundwater elevation contour map for the shallow aquifer immediately before the cessation of dewatering in 1956.

Grp 8-131

2) Hydrographs for simulated heads in the shallow aquifer for the historic period 1920 to 2020 plus continuation for the 25 years of predictive modeling for future mining. The hydrographs should be for groundwater elevation in ft amsl versus time for the 125 years and represent the heads in the shallow aquifer near wells labeled WS95, WS216, WS201, WS80, WS 91, and WS85 on Itasca Figure 2-6.

Grp 8-132

3) Model water budget (all volumetric water inputs and outputs) for the general area of the mineral rights boundary over the 125 years simulated, preferably in plot rather than tabular format, using the one-month time increment used in the modeling.

Grp 8-133

4) The model should be run using the 2019 water levels as the initial conditions for the predictive simulations. Contour maps, hydrographs, and water budgets should be provided for these revised predictive runs.



Figures Cited

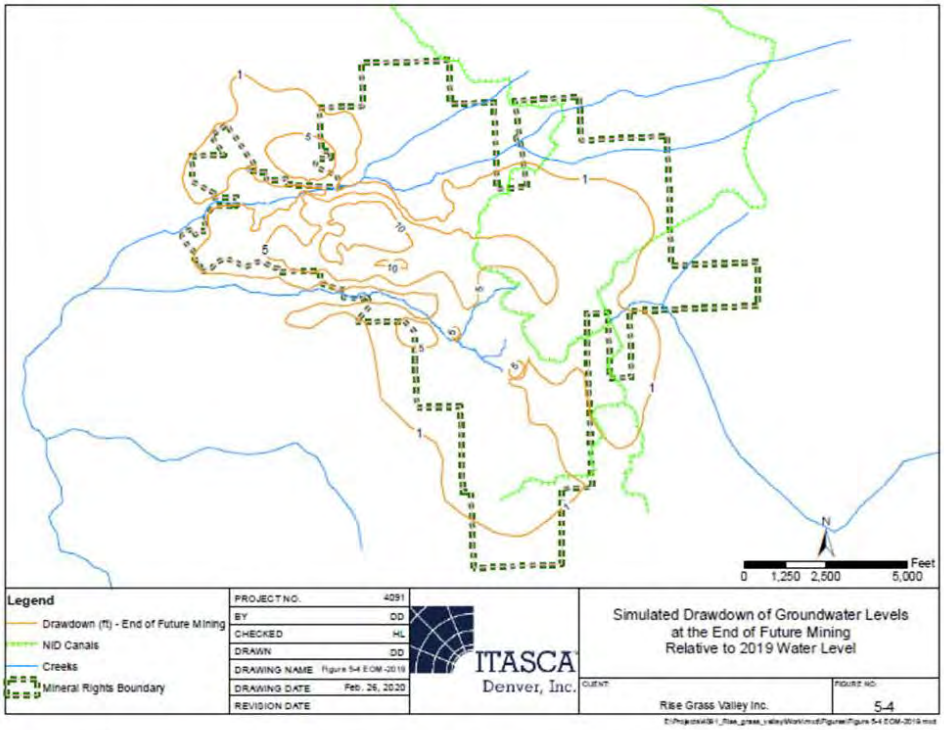
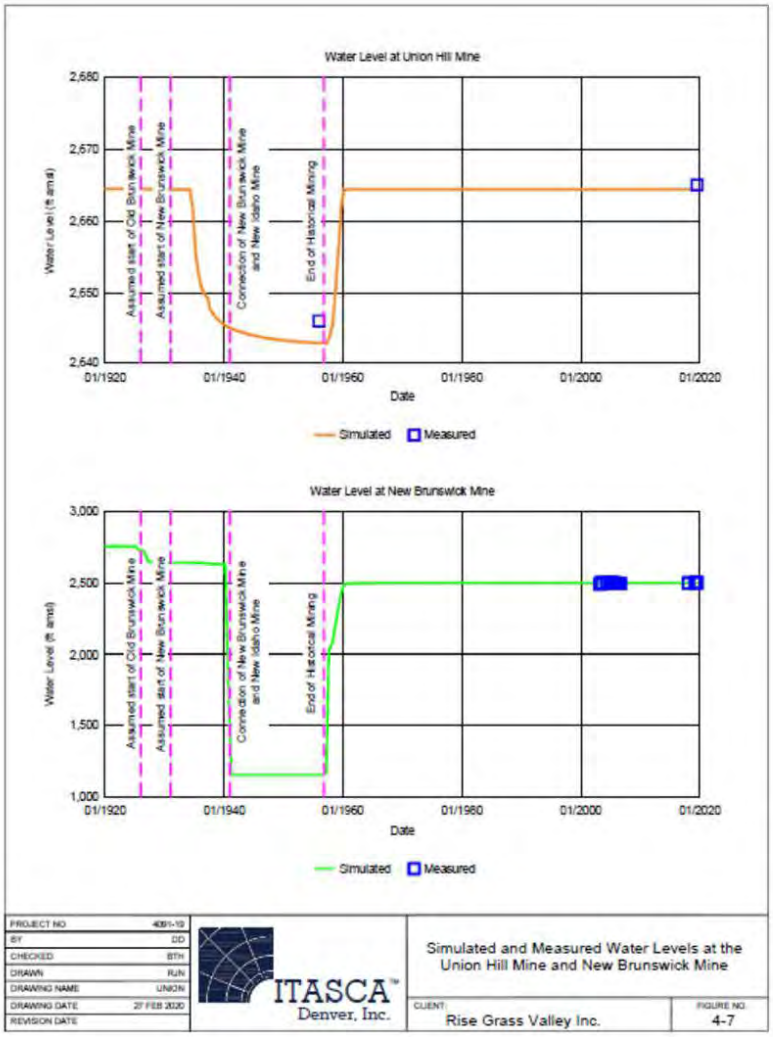


Figure also reproduced as Figure 4-1 in EMKO (2020a) as basis for extent of area of significant impact to shallow domestic wells requiring mitigation.


Water Level at Union Hill Mine
Water Level (ft amsl)
2,680
2,670
2,660
2,650
2,640
01/1920
01/1940
01/1960
01/1980
01/2000
01/2020
Date
Assumed start of Old Brunswick Mine
Assumed start of New Brunswick Mine
Connection of New Brunswick Mine and New Idaho Mine
End of Historical Mining
Simulated
Measured
Water Level at New Brunswick Mine
Water Level (ft amsl)
3,000
2,500
2,000
1,500
1,000
01/1920
01/1940
01/1960
01/1980
01/2000
01/2020
Date
Assumed start of Old Brunswick Mine
Assumed start of New Brunswick Mine
Connection of New Brunswick Mine and New Idaho Mine
End of Historical Mining
Simulated
Measured
PROJECT NO 4091-10
BY DD
CHECKED BTH
DRAWN RJN
DRAWING NAME UNION
DRAWING DATE 27 FEB 2020
REVISION DATE
ITASCA
Denver, Inc.
Simulated and Measured Water Levels at the Union Hill Mine and New Brunswick Mine
CLIENT
Rise Grass Valley Inc.
FIGURE NO.
4-7

Mar 25, 2022

To: Matt Kelley, Senior Planner

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530-265-1423
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Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

SAMPLE QUALITY CONTROL REVIEW

The EPA Hazardous Waste Test Methods SW-846 Compendium establishes guidelines for sampling and analyses such as sampling containers, preservation and recommended hold times for analytes.

Recommended holding times ensure that the sample is analyzed for the requested parameter prior to any bio-degradation, oxidation, precipitation, sorption, volatilization, and other physical and chemical processes that may occur that can affect the integrity of the sample.

All metals were digested using EPA Method 3050B. The results should be defined as the "Total acid soluble/recoverable metals" fraction since this method does not use hydrofluoric acid, thus it is unable to break down silicates. (EPA SW-846 Revision VI December 2018, Chapter 3, pg 4)

Grp 8-134

Chapter 3 of the SW-846 Revision VI December 2018, pp 21-22 has the following footnotes regarding preservation and hold times:

a These recommendations are intended as guidance only. The selection of sample and digestion volumes/mass and preservation and holding times should be made based on the nature of the sample, the intended end use of the data and the data quality objectives.

1 The exact sample extract, and standard storage temperature should be based on project-specific requirements and/or manufacturer's recommendations for standards. Alternative temperatures may be appropriate based on demonstrated analyte stability within a matrix, provided the data quality objectives for a specific project are still attainable.

2 A longer holding time may be appropriate if it can be demonstrated that the reported analyte concentrations are not adversely affected by preservation, storage and analyses performed outside the recommended holding times.

SEE ATTACHED FILE: SW846 Metals

And while these guidelines are only "recommended" by the EPA, the context of data usage must be considered. The metals analyses data are being used in toxic metals leachate analyses and toxic air contaminant emissions. Also, heavy metals concentrations are known to potentiate the effects of asbestos toxicity. Since **the intended end use of the data** directly impacts public health, data quality is of utmost importance.

1

Grp 8-135

The recommended EPA holding times have been missed in both aqueous and solid sample categories.

SOLIDS-HOLD TIMES

Pages 515-516 of the *Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO shows a list of 47 samples that were sent out for "gold determinations" to ALS Laboratories in Reno, NV (pg. 93, *Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO). These samples are listed as from drill cores I-18-02*, I-18-10, I-18-11, I-18-12 and I-19-13. DATE RECEIVED is noted as 02-20-2019.

NOTE: In Table 4-9 Barren Rock Crushed Core Sample Trace Metals Results (*Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO Pg 101)
The sample listed as I-18-02 in the Appendices (pg 515) is now labelled B-18-02. Sample depths of 948- 958 bgs correlate between I-18-02 and B-18-02 labelled samples.

This means that all of the rock, tailings, soil, etc. samples that were used for the metals analyses were beyond the 6 months hold time. How far beyond that window is currently unknown since exact sample dates for the individual drill cores are not available-but this date (02.20.2019) suggests expiration by at least 9 months. Where are the drill logs needed for confirmation?

ACZ Laboratories lists the sample dates as 03.05.2019 for all 47 "soil" samples for metals analyses. The laboratory received by date for all samples is 11.11.2019. Again, the samples may have been collected for shipment on 03.05.2019 but their actual sample dates were months prior.

Twenty samples were digested on 11.22.2019 and the remaining twenty-seven samples were digested on 11.26.2019. (The digestion dates would be used for endpoint hold time calculations). All data is notated that the "samples were received and analyzed past hold time". (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO Inorganic Extended Qualifier Reports pp. 389-407 and 458-484, Appendix D)

The samples MA-1, MA-2, MA-3, MAA-1, MS-1 and S-1 were collected by Benchmark Resources on 10.29.2019 for the leachate studies. Samples "collected" were from I-18-10, I-18-11 and I-19-13 drill cores. (*Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO Pg 93)

ACZ Laboratories lists 10.29.2019 as the sample date for this study when again these samples were obtained prior to 02.20.2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO pp 495-500)

Mercury analysis has a 28-day hold time and requires storage between 0-6°C (pg. 316 Sample Receipt form states that the cooler temperature was 18.8 °C, criteria ≤ 6.0. Wet or gel ice not present). These results are notated "Sample was received above recommended temperature" and "Sample matrix is solid rock and a homogenous sample aliquot could not be created for Hg analysis prior to preparation and air drying. Hg analysis was performed on crushed, homogenized, and air dried (40C) sub sample. Some loss of Hg may have occurred. Residual moisture on the prepped sample fraction was used for data collection."

Sample Receipt form states: "Some parameters were received past hold time" when in fact, ALL PARAMETERS WERE RECEIVED PAST HOLD TIME.

In addition, sample L55806-02 (MA-2) was noted "sample container was broken, was placed in ziplock bag". The type of sample containers was not provided on any COC forms. If these samples were stored in glass, then all boron analyses are invalid since it may be leached from glass containers.

2

Some general chemistry parameters (Chloride-WET DI, Nitrate/Nitrite as N -WET DI, Nitrate as N-WET DI, Sulfate)-WET DI are notated: "Analysis is outside the intended scope of the method, which does not provide hold time information for soil extracts. No hold time is observed for collection to extraction. The referenced method hold time is observed for extraction-to-analysis". The Nitrate/Nitrite as N-WET DI and Nitrate as N-WET DI were also notated as "Sample was received above recommended temperature" and the Nitrate as N-WET DI had the additional notation of "Sample was received and analyzed past holding time". (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO pp 297-314)

On page, ACZ Laboratories states that "The following parameters are not offered for certification or are not covered by NELAC certificate #ACZ": Boron (WET DI), Solids (Percent), and Sulfate (WET DI)". ((*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO pp. 315,355 Certification Qualifiers)

ACZ Laboratories lists 10.29.2019 as the sample date for M-1, M-2, M-3, MAA-1, MS-1 and S-1 along with sample date of 11.04.2019 for F-1, F-2, F-3 and F-4 on the Acid-Base Accounting tests when again these samples were obtained prior to 02.20.2019 (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO pp 501-504). F1-F4 samples are a composite of core tailings that were drilled prior to 02.20.2019. For some reason, these samples were not received by ACZ Laboratories until 01.29.2020.

On pp 510, (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO), Certification Qualifiers have the following statements:

"The following parameters are not offered for certification or are not covered by NELAC certification #ACZ:

- Neutralization Potential as CCO3 M600/2-78-054 NV Modified Sobek Procedure
- pH, Saturated Paste EPA 600-2-78-054 section 3.2.2
- Sulfur HCl Extractable M600-2-78-054 3.2.4 & 3.2.6 NV Modified Sobek Procedure
- Sulfur HNO3 Extractable M600-2-78-054 3.2.4 & 3.2.6 NV Modified Sobek Procedure
- Sulfur Hot H2O Extractable M600-2-78-054 3.2.4 & 3.2.6 NV Modified Sobek Procedure
- Sulfur Residual M600-2-78-054 3.2.4 & 3.2.6 NV Modified Sobek Procedure
- Sulfur Total M600-2-78-054 3.2.4 & 3.2.6 NV Modified Sobek Procedure

These were the methods used for Acid-Base Potential determinations.

AQUEOUS SAMPLES

All coliform tests (E. coli, Fecal and Total) exceeded hold times (pg. 99, *Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*).

All pH tests exceeded hold times since this is a field test to be performed within 15 minutes.

Grp 8-136

D-1 sampled on 02.13.2018 exceeded hold times for BOD, MBAS, NO_3 and NO_2.

ED-1 sampled 02.13.2018 exceeded hold times for BOD, MBAS, NO_3 AND NO_2.

The data is notated as such in the Appendices, pp 83-89.

All samples in the Fish Bioassay study were notated:
"12/21/18 Only 1 10 Liter effluent sample was provided for the initiation and renewal therefore could only perform a 25% renewal on day 2." (*Appendices: Groundwater Hydrology and Water Quality Analysis Report for The Idaho-Maryland Mine Project*, EMKO pp 222-228)

3

Grp 8-137

Both Ben Mossman and Andrew Kopania received copies of all laboratory reports. The cover letter from ACZ states that: "This report shall be used or copied in its entirety. ACZ is not responsible for the consequences arising from the use of a partial report."

However, the data from these analyses is used in multiple consulting reports without any notations as to the validity of the data.

Thank you,

Pam Heard RRT

Pam Heard RRT (Registered Respiratory Therapist)

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4

TABLE 3-2

RECOMMENDED SAMPLE HOLDING TIMES, PRESERVATION, COLLECTION QUANTITIES, AND DIGESTION VOLUMES/MASS FOR SELECTED INORGANIC ANALYTE DETERMINATIONS IN AQUEOUS AND SOLID SAMPLES[a,b]

Analyte	Matrix	Fraction	Minimum Collection Volume/Mass	Preservation[1]	Digestion Volume	Holding Time[2]
Metals (except Hg and Cr^{6+})	Aqueous	Total/total recoverable	600 mL	HNO_3 to pH<2	100 mL	6 months
		Dissolved	600 mL	Filter on site; HNO_3 to pH<2	100 mL	6 months
		Suspended	600 mL	Filter on site;	100 mL	6 months
	Solid	Total	200 g	None	2 g	6 months
Hexavalent chromium	Aqueous		400 mL	≤6 °C	100 mL	24 hours
	Solid		100 g	≤6 °C		30 days to extraction
				≤6 °C	2.5 g	7 days from extraction to analysis
Mercury	Aqueous	Total	400 mL	HNO_3 to pH<2	100 mL	28 days
		Dissolved	400 mL	Filter; HNO_3 to pH<2	100 mL	28 days
	Solid	Total	200 g	≤6 °C	0.2 g	28 days
	Solid	Species	200 g	≤6 °C	0.2 g	5 days
Chloride	Aqueous		50 mL	≤6 °C	—	28 days
Cyanide	Aqueous		500 mL	≤6 °C; NaOH to pH>12	—	14 days
	Solid		100 g	≤6 °C	—	14 days
Fluoride	Aqueous		300 mL	≤6 °C	—	28 days
Nitrate	Aqueous		1000 mL	≤6 °C	—	28 days
Hexane Extractable Material (HEM; Oil & Grease)	Aqueous		1000 mL	≤6 °C HCl or H_2SO_4 to pH <2	—	28 days
	Solid		100 g	≤6 °C		28 days
				HCl or H_2SO_4 to pH <2		when practical

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GROUP LETTER 8: RALPH SILBERSTEIN, COMMUNITY ENVIRONMENTAL ADVOCATES FOUNDATION

Response to Comment Grp 8-1

This comment is introductory in nature, states that the DEIR is inadequate, but does not provide any specific comments on the DEIR. The commenter's specific comments are addressed below in Responses to Comments Grp 8-2 through Grp 8-137. In addition, responses to the referenced Baseline comments are provided in Responses to Comments Grp 21-107 to Grp 21-128; and responses to the referenced Salter comments are provided in Responses to Comments Grp 21-129 to Grp 21-145.

Response to Comment Grp 8-2

The commenter asserts that the images of the facilities provided in the DEIR are not a fair representation of the actual visual character of the project, which causes the DEIR to understate visual impacts. As discussed in Section 3.2 of Appendix D to the DEIR, photographs from each viewpoint were taken from approximately 5½ feet above ground level, the approximate eye level of an average standing human. The camera lens was adjusted to mimic the perspective of the human eye (approximately 55 millimeters). Panorama photographs were taken to include peripheral elements that a viewer would see and present the view of the project site in relation to the surrounding area or viewshed.

The DEIR has already determined the project's aesthetic impacts to be a significant and unavoidable. Therefore, further analysis with the different photography method suggested by the commentor would not impact the significance determination set forth in the DEIR.

Response to Comment Grp 8-3

The commenter states that the use of an erosion control seed mixture for reclamation of the engineered fill piles would cause a "dead zone" and implies that this will cause an aesthetic impact. The commenter then states that native vegetation including deciduous and evergreen bushes and trees should be required as mitigation. The engineered fill piles require use of an erosion control seed mixture to prevent erosion of the slopes due to precipitation. While native plants may start to naturally grow on the slopes after reclamation, use of evergreen bushes is not an adequate method to prevent erosion; therefore, the erosion control seed mixture is the preferred reclamation method. The commenter's suggested mitigation would lead to significant erosion impacts and is therefore not appropriate for the project. Furthermore, the forestation of slopes on engineered fill piles was examined as an alternative in Section 6 of the DEIR and, as discussed on page 6-15 of the DEIR, while the planting of trees along the slopes of the Centennial and Brunswick engineered fill piles would reduce the proposed project's aesthetic effects by adding screening, the substantial slopes would not be fully screened due to the required tree spacing, and the aesthetic impact would be anticipated to remain significant and unavoidable. Therefore, this alternative would not be anticipated to avoid or substantially lessen a significant impact identified for the project. Given the limited efficacy of this alternative, it was rejected from further consideration.

Response to Comment Grp 8-4

Please see response to referenced Baseline comment. Please see Response to Comment Grp 21-124.

Response to Comment Grp 8-5

The Brunswick site is not located in the Loma Rica Drive Industrial area and therefore not subject to the Loma Rica Drive Industrial Area Plan. The referenced language refers to FAA regulations governing buildings, radio towers and other structures that physically obstruct aircraft flight paths due to their height. The project does not propose any structures that would be tall enough to be considered an obstruction under FAA regulations in the applicable airport safety zone. The project will be reviewed by the Airport Land Use Commission as it would have a building floor area of 20,000 square feet or greater, would include more than 100 people on-site, and would include new development of buildings more than 100 feet tall in Zones D and E. (DEIR, p. 4.7-36.) However, airspace review is not required for the project because the tallest point of the project (the 165ft headframe) would be at 2,912 feet msl, while the threshold for airspace review is almost 300 feet higher at 3,207 feet msl. (DEIR, p. 4.7-36.) The commenter does not explain how mine exhaust would be considered an "object" subject to these regulations.

The project would not create a persistent cloud plume or fog, and the commenter provides no substantial evidence to support its claim that the mine exhaust would create turbulence. This comment is speculative, and CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Please see Response to Comment Grp 7-95 regarding mine exhaust moisture.

Response to Comment Grp 8-6

The commenter asserts that the mine exhaust could cause persistent fog and turbulence. However, the project would not create a persistent cloud plume or fog, or cause turbulence. Please see Response to Comment Grp 7-95.

Response to Comment Grp 8-7

Please see Response to Comment Grp 7-95 regarding mine exhaust moisture.

Response to Comment Grp 8-8

Please see Responses to Comments Grp 7-95 and Grp 8-5.

Response to Comment Grp 8-9

The commenter summarizes comments from Group Letter 7. Exploration and testing for asbestos is conducted before mining of materials. The DEIR includes asbestos testing requirements and mitigation measures to ensure asbestos exposure to the public and workers will be less than significant. Please see Responses to Comments Grp 7-6, Grp 7-7, and responses to the referenced ASUR Plan Analysis in Grp 7-103 through Grp 7-137. Please also refer to Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Grp 8-10

The commenter summarizes comments from Group Letter 7. No such stockpile is proposed for the project. Please see Responses to Comments Grp 7-6, Grp 7-7, and Grp 7-137.

Response to Comment Grp 8-11

The commenter summarizes comments from Group Letter 7. No such stockpile is proposed for the project. Please see Responses to Comments Grp 7-6, Grp 7-7, and Grp 7-137.

Response to Comment Grp 8-12

The commenter summarizes comments from Group Letter 7. No such stockpile is proposed for the project. Please see Responses to Comments Grp 7-6, Grp 7-7, and Grp 7-137.

Response to Comment Grp 8-13

The commenter states that asbestos and silica are toxic air contaminants with no identified safe exposure levels, and that the HRA should analyze 80 years of exposure. Further, the commenter states that the DEIR needs to identify clear and achievable mitigation measures with robust monitoring systems of waste rock during transport and disposal.

As stated on page 4.3-42 of the DEIR, the NSAQMD's cancer and noncancer thresholds to assess health risk significance of asbestos and silica exposure for CEQA are consistent with what are used for the AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor, including silica and asbestos exposure, will be below this threshold. The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions and Master Response 21 – Conservatism of Silica Assumptions.

While the commenter requests that the HRA analyze an exposure timeframe of 80 years, OEHHA recommends that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident (MEIR) in the Hot Spots Program. This exposure duration represents the time of residency for 90 to 95% of Californians at a single location and should provide adequate public health protection against individual risk. (Section 8.1 OEHHA 2015 Air Toxics Hot Spots Program Manual).

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring.

Response to Comment Grp 8-14

The commenter states that the use of Blue Canyon's meteorological data for the HRA is not valid and that the DEIR must use different data for its analysis. The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Grp 8-15

The commenter asserts that the DEIR needs to analyze the impact of the project on radon levels, including data on existing background radon levels of all homes and properties near the project. Elevated radon gas levels in indoor air are a result of radon moving into buildings from the soil, either by diffusion or flow due to air pressure differences. The ultimate source of radon gas in buildings is the uranium naturally present in the rock, water, and soil. Some rocks types are known to contain more uranium than others. However, geology cannot be used to predict whether a

particular building will have a radon problem. (CDHS 1991).[1] Radon can also enter homes through their water systems when using domestic wells. The areas most likely to have problems with radon in groundwater are areas that have high levels of uranium in the underlying rocks. (USGS 1992).[2] According to maps prepared by the California Department of Health Services, there are no known rock formations with elevated uranium in western Nevada County (see figures 2-4, 10-13 of CDHS 1991). There are granitic rocks in Nevada County, which may have elevated uranium; however, there are no granitic rocks in the mineral claims area (see Sheet 4 of Appendix K.2).

Moreover, underground mining would not affect radon entry into buildings because the vibration levels are much lower than would be required to damage the foundation or structure (see Section 4.10-4 of the EIR). Radon levels in homes along E. Bennett Road who choose to use NID water may have reduced radon in their homes as water from groundwater wells can contribute to radon levels in indoor air. As such, the project may reduce existing radon levels, if any radon exists, in the 30 parcels proposed for connection to NID water. Because the mining activities will only lead to the drawdown of groundwater and thus not provide recharge to the domestic wells, the mining activities at the project site should not affect the water quality of the domestic wells. (Page 14 of Appendix K.8). Any naturally occurring radon currently in groundwater would be unchanged by the project.

Radon is not considered a toxic air contaminant by the OEHHA or CARB and does not have an associated reference exposure level. Further, the commenter provides no evidence that the project could cause impacts related to radon exposure, and simply speculates that impacts may result. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no analysis of radon related impacts is required.

Response to Comment Grp 8-16

The commenter asserts that the DEIR failed to analyze impacts relating to South Fork Wolf Creek, including benthic macro-invertebrates, trout and other aquatic species. The commenter further states that the DEIR fails to analyze impacts to "an entire reach of South Fork Wolf Creek." However, DEIR Chapter 4.4 and Chapter 4.8 analyzed potential project impacts to biological resources and hydrology and water quality affecting South Fork Wolf Creek, respectively, including the portion of the creek that the commenter claims was excluded. As outlined in Section 4.4.1 (Introduction) and included as Appendix F, eleven different technical studies were prepared documenting existing environmental conditions and analyzing potential biological impacts from the proposed project. This includes a specific biological assessment technical report analyzing treated project water discharge to South Fork Wolf Creek (see Appendix F.10). These technical reports were prepared by biologists with over 30 years of local expertise in the species and environment within the project site. These technical studies were then peer reviewed by the County and its independent environmental consultants. The peer review of biology reports was conducted by a biological firm with similar local experience that resulted in several rounds of review and revision prior to the County's acceptance of these reports for use in the DEIR. As a

[1] CDHS (California Department of Health Services. 1991. *Geologic Controls on the Distribution of Radon in California.* California. Available at: https://www.conservation.ca.gov/cgs/Documents/Melange/Geo_Controls_Dist_Radon.pdf.

[2] USGS (US Geological Survey. 1992. *The Geology of Radon.* United States. Available at: https://pubs.usgs.gov/gip/7000018/report.pdf.

result, numerous biological experts with local knowledge have analyzed and reviewed the characterization and analysis included in these biological technical reports prior to their use and incorporation into the DEIR. In addition, as summarized in Chapter 4.8, and included in appendix H and K, ten different technical reports and peer reviews related to hydrology and water quality were prepared documenting or confirming ground and surface water conditions at the site and potential impacts from the proposed project. Specifically, two technical reports (Appendix K.1 and K.2) analyzed treated water discharge from the project and its potential impact to South Wolf Creek. These technical documents were also peer reviewed by the County and their environmental consultant.

Special status species that may utilize South Wolf Creek were analyzed in Impact 4.4-2 including Foothill Yellow-Legged Frog (FYLF) and Western Pond Turtle. Analysis of the Olive-sided flycatcher, Willow flycatcher, Yellow-breasted chat, and Yellow warbler has been added to Section 4.4 in the Final EIR. No significant impacts to these species were identified. As discussed in Impact 4.4-2, VES method surveys were conducted for FYLF along South Fork Wolf Creek within the project site and portions that flow through public property within Empire Mine State Historic Park. FYLF were not identified during these surveys. Impact 4.4-2 summarizes site and hydrologic conditions in South Wolf Creek within the project site and offsite demonstrating marginal habitat for FYLF. In addition, Impact 4.4-2 addressed potential treated mine water discharge impacts to FYLF and benthic macroinvertebrates and concluded this impact would not be adverse. As explained in Impact 4.4-2, and detailed in Chapter 4.8 and Appendix K.1, the proposed project will discharge a maximum of 5.6 cubic feet per second (cfs) of treated mine water to South Fork Wolf Creek. Base flow in South Fork Wolf Creek may range from 0.17 cfs in the summer to 6.5 cfs in the winter between storm events. Sediment pebble count analysis (see Appendix K.1) indicates that the flow rate at which sediment within the channel may become mobilized ranges from 20 cfs to 90 cfs. With the addition of the maximum proposed discharge of 5.6 cfs and increasing measured baseflows by a 50 percent safety factor, post-project baseflows during nonstorm periods would be expected to range between approximately 5.8 cfs and 15 cfs. These estimates are less than 23 cfs, the threshold for bedload sediment mobility and well below flows that commonly exhibit significant work on the channel (with minimal bed sediment becoming mobilized and minimal or no bank erosion, bed scour, or channel avulsion). The DEIR therefore concludes potential downstream impacts to the stream channel and associated riparian zone along both sides of South Fork Wolf Creek from the additional discharge of 5.6 cfs would be minimal on sensitive biological resources, such as foothill yellow-legged frog, and do not represent a potential significant impact to the stream channel or associated riparian zone within South Fork Wolf Creek. Additionally, peak flows on the South Fork Wolf Creek are expected to be lower than pre-project conditions due to the stormwater detention basin being constructed on the project site as part of the project. Please see Master Response 33 - Groundwater Dependent Vegetation; Master Response 32 - Temperature of Mine Water Discharge; Master Response 34 - Resident Fish; Master Response 35 - Discharge to South Fork Wolf Creek; Master Response 36 - Flows in South Fork Wolf Creek and Wolf Creek; Master Response 37 - Birds and Raptors; and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 8-17

Regarding the comments pertaining to the rate treated water discharge into the South Fork Wolf Creek, please see Response to Comment Grp 7-32. Regarding the assertion that the DEIR does not consider seasonality of streamflow, loss of streambed or streambank habitat, differences in Specific Conductance, and habitat for BMI, please see Responses to Comments Grp 7-34 and Grp 31-35, as well as Master Response 36 - Flows in South Fork Wolf Creek; and Master Response 35 - Discharge to South Fork Wolf Creek.

Regarding concerns related to changes in water temperature, please see Response to Comment Grp 7-36 and Master Response 32 – Temperature of Mine Water Discharge.

Regarding drawdown of water table and impacts to various habitats, please see Master Response 33 – Groundwater Dependant Vegetation.

Regarding concerns regarding cumulative impacts to BMI, trout, and other aquatic species, please see Response to Comment Grp 7-35.

Response to Comment Grp 8-18

The commenter asserts that the DEIR failed to analyze impacts from preparation of the Centennial Site for the cleanup project and subsequent use for placement of engineered fill. Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA.

Response to Comment Grp 8-19

The Centennial Biological Resources Assessment (Appendix F.2) and Centennial Impact Technical Memorandum (Appendix F.3) used the Brunswick site as the reference location for the 5-mile radius CNDDB report and figure. Updated CNDDB 5-mile radius figure has been provide below using both the Brunswick and Centennial Industrial Site as the reference location. As shown in these figures, no new species were identified that have a moderate or high potential to exist onsite. With respect to yellow-breasted chat shown on the figures, please see Master Response 37 – Birds and Raptors.

Response to Comment Grp 8-20

Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA. In addition, please see Section 1.3 of the DEIR for a full explanation of the baseline approaches used for the project.

Response to Comment Grp 8-21

The commenter states that approval of the Draft RAP is uncertain; therefore, the DEIR must use a baseline of existing conditions for the Centennial Site. The commenter's suggested baseline would be misleading, because the project could not place any material on the Centennial Site until after the DTSC cleanup project is completed and in the case that the DTSC project did not proceed, the project would proceed without any use of, or impact on the Centennial Site. Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA. In addition, please refer to Section 1.3 of the DEIR for a full explanation of the baseline approaches used for the project.

Response to Comment Grp 8-22

Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA. In addition, please see Section 1.3 of the DEIR for a full explanation of the baseline approaches used for the project.

Response to Comment Grp 8-23

Soil storage locations are shown on Sheets 3 and 5 of the Reclamation Plan (Appendix C of the EIR). The movement of soil is included and accounted for in the air quality impact analysis.

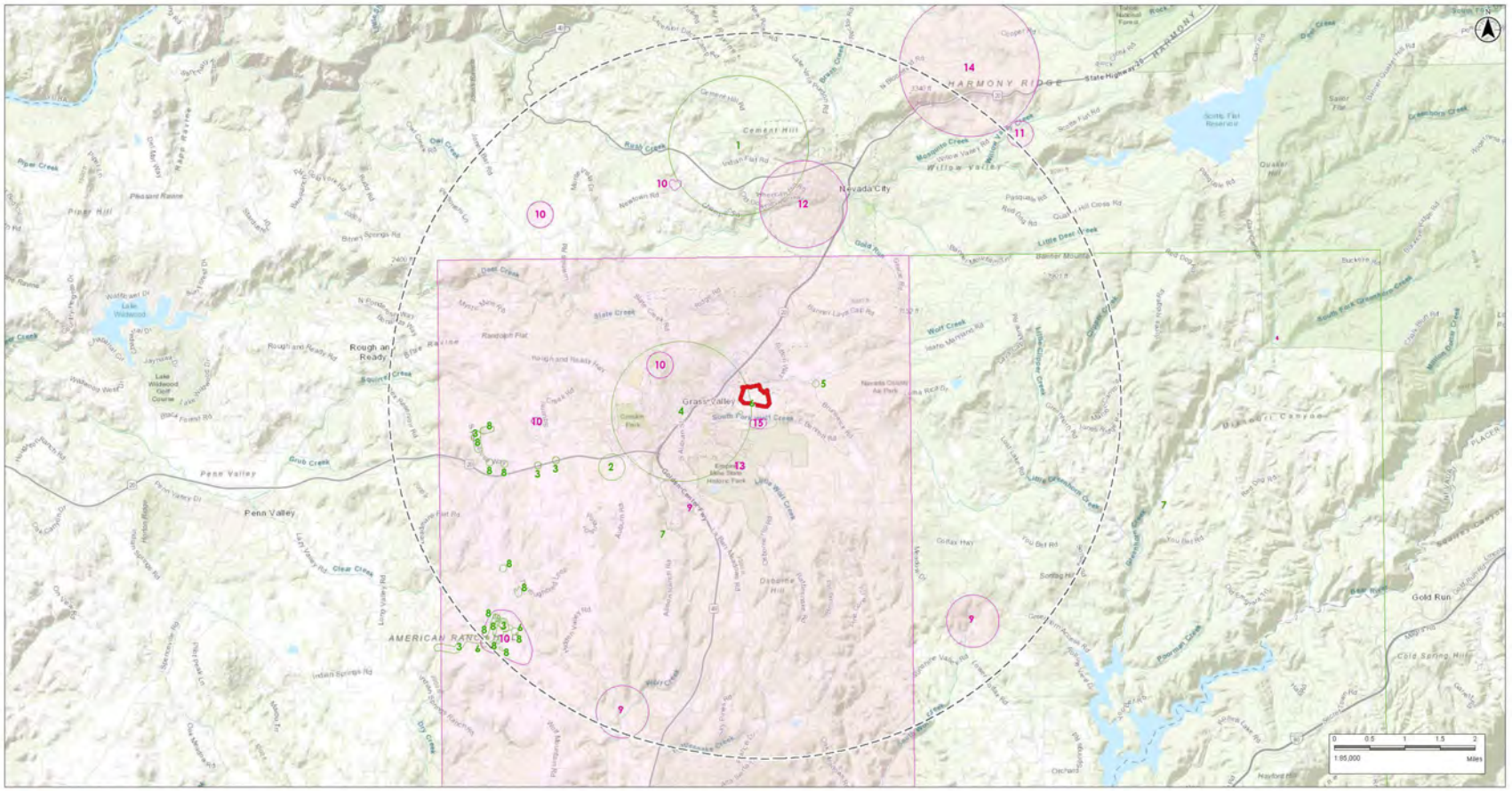


Figure 3. CNDDB and Critical Habitat Map

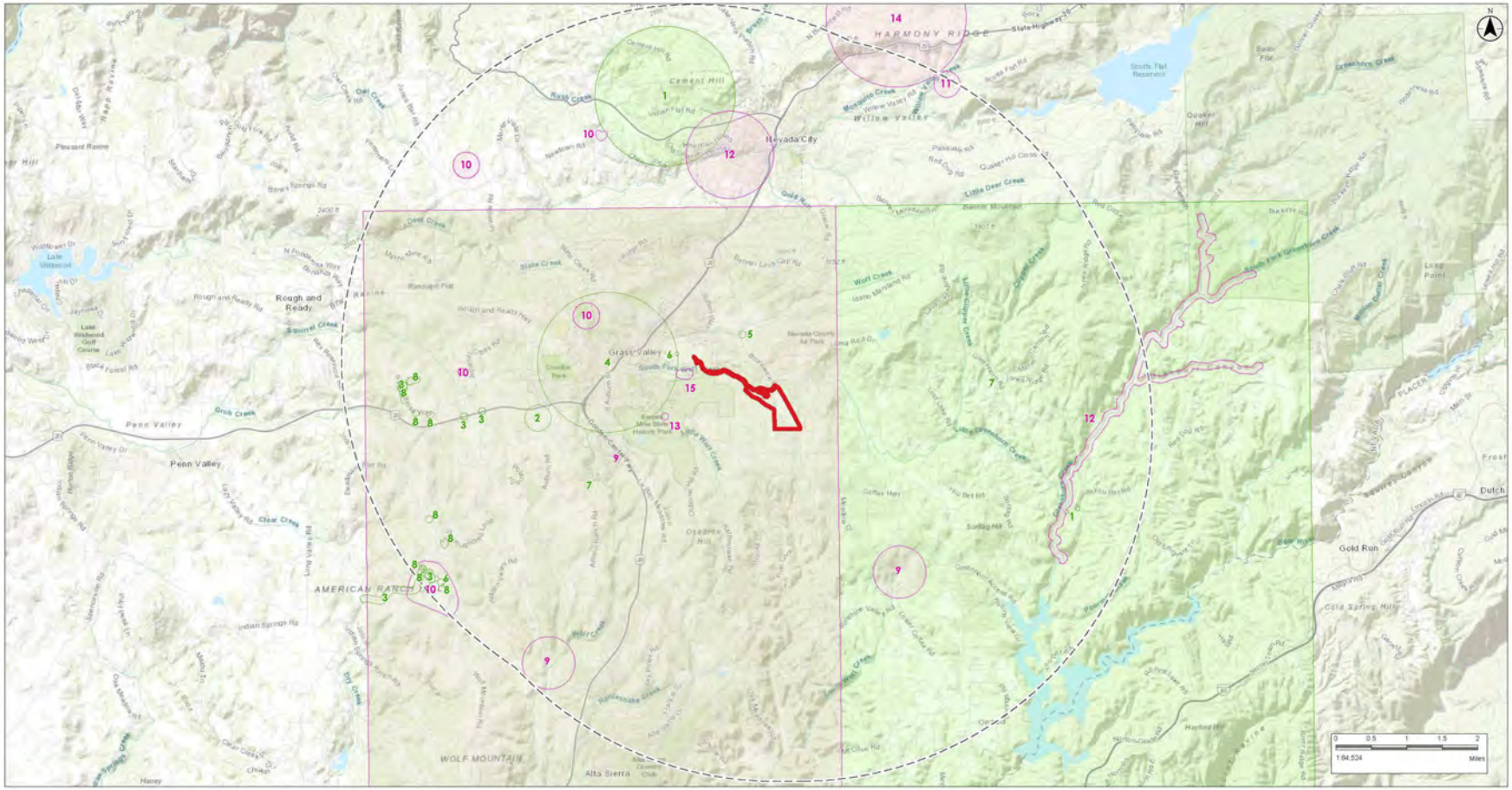
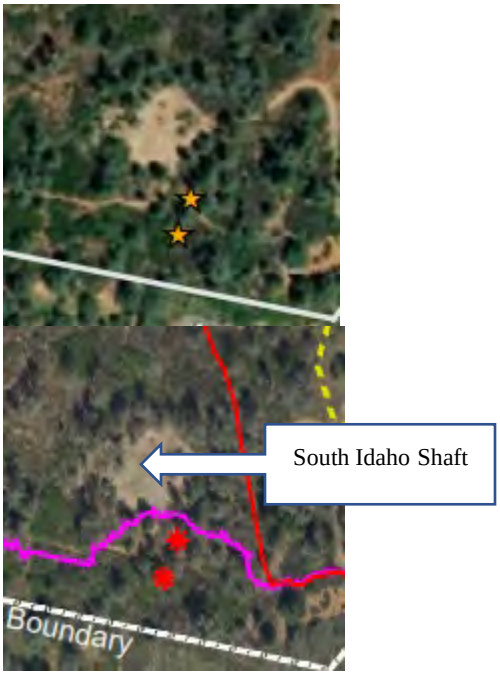


Figure 3. CNDDB and Critical Habitat Map

Response to Comment Grp 8-24

The South Idaho Shaft is inside the area of proposed placement of engineered fill at the Centennial site. Impacts to flannelbush plants have therefore already been analyzed in the DEIR. The location of the South Idaho Shaft is shown as a distinctive circular opening on the southeast portion of the Centennial Site on the Figure in Appendix D of Appendix F.4 of the DEIR. The South Idaho Shaft is outside of the DTSC cleanup disturbance area and inside of the Idaho-Maryland Mine Project disturbance area as shown in Figure B of Appendix F.4 of the DEIR. No flannelbush plants are located in the location of the South Idaho Shaft as can be seen on these figures.

Clips of figures referenced above from Appendix F.4 are shown below for clarity of the response.



Response to Comment Grp 8-25

Appendix F.3 and Appendix F.4 were technical reports prepared by an independent biologist with analysis of potential impacts and recommendations for protection measures. The County peer reviewed these documents, and as appropriate, incorporated the analysis and recommendations into the DEIR. The DEIR, which includes mitigation measures where appropriate, uses the terms "shall" or must" and therefore are enforceable. (See Mitigation Measure 4.4-1(a).) For example, Mitigation Measure 4.4-1(a) states "Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area." (Emphasis added.)

Response to Comment Grp 8-26

The commenter states that the DEIR's Habitat Management Plan (HMP) for Pine Hill flannelbush proposes to remove 18 plants and that 4 other plants could be impacted, but does not explain why the plants need to be removed. The commenter requests that the DEIR be amended to eliminate the need to remove the 18 plants. As explained in DEIR Impact 4.4-1:

> "The proposed placement of engineered fill at the Centennial Site would impact 18 Pine Hill flannelbush plants directly by requiring their removal as part of the Idaho-Maryland Mine Project. The remaining 42 individual Pine Hill flannelbush plants are located outside of the proposed engineered fill areas and therefore, they would not be directly impacted by the Idaho-Maryland Mine Project. However, four individual Pine Hill flannelbush plants would be located within 30 feet of the edge of the engineered fill material and could be subject to indirect effects from changes in topography, runoff, etc. that could occur as an edge effect on those individual plants."

As discussed above, the need to remove the 18 plants for placement of engineered fill and possible impact to 4 other plants due to the proximity to the engineered fill pile was already discussed in the DEIR in Impact 4.4-1. Further, as demonstrated above, impacts to Pine Hill flannelbush were addressed and considered potentially significant. A mitigation measure was identified requiring the preparation and implementation of a habitat management plan (see Mitigation Measure 4.4-1(a)) reducing this impact to a less than significant level.

Response to Comment Grp 8-27

Appendix F.4, Habitat Management Plan for the Pine Hill flannelbush, section 6.3 explains the transplantation and monitoring timing requirements for impacted Pine Hill flannelbush. The location of transplantation will be similar soil, hydrologic, vegetation type and aspect.

As explained in Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prevented and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, Mitigation Measure 4.4-1(a)(5) and the draft management plan provides alternative maintenance transplantation measures to help achieve success criteria.

The commenter asks for detailed site activity phasing but CEQA does not require engineering level details. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.).

Response to Comment Grp 8-28

Please see Responses to Comments Grp 8-24 to Grp 8-27. The commenter does not provide environmental reasons why the conclusions of the DEIR are incorrect, and rather concludes that impacts are significant and unavoidable. The DEIR, specifically Impact 4.4-1 and Appendix F.4, provide substantial evidence the potential impacts to Pine Hill flannelbush have been appropriately analyzed and provides mitigation reducing the impact to a less than significant level. Further, the project's Pine Hill flannelbush impacts and the DEIR's proposed mitigation have been peer reviewed by the County's independent biologist.

Response to Comment Grp 8-29

Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA. In addition, please see Section 1.3 of the DEIR for a full explanation of the baseline approaches used for the project.

Response to Comment Grp 8-30

Please see Master Response 4 – Cleanup Project is a Separate Project under CEQA. Please see Response to Comment Grp 7-78 regarding impacts to recharge caused by removal of the Centennial Site wetlands and subsequent placement of low permeability engineered fill.

Response to Comment Grp 8-31

The commenter states that preparations for waste dumping are proposed to take place up to the boundaries for protected species, wetland, and riparian setbacks but provides no information or specifies what boundaries are referenced. The description and analysis in Chapter 4.4 of the DEIR does not indicate any location where the boundaries of proposed engineered fill piles is adjacent to the boundary of a protected area (See Figure 4.4-10 and 4.4-9 of the DEIR). DEIR Impact 4.4-3 analyzed the project's potential to impact state or federally protected waters and wetlands and determined this impact was potentially significant. Surface disturbance on the Centennial Industrial Site has the potential to impact approximately 0.033-acre of ephemeral streams. Mitigation measures 4.4-3(a-d) were identified that reduce this impact to a less than significant level. Mitigation Measure 4.4-3(b) specifically requires the applicant to prepare a watercourse/wetlands/riparian area management plan a draft of which was included as Appendix F.5. The management plan includes best management practices and erosion control to prevent discharge to Wolf Creek. In addition, the project will be required to have a constructive SWPPP that will outline similar measures to reduce erosion and sedimentation from project construction. Chapter 4.4 of the DEIR provides a through analysis of protected species and proposed mitigation to reduce impacts to protected species to a less than significant level. Mitigation Measures 4-4-1(b) has been modified in the Final EIR to require that a qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special-status plants.

Response to Comment Grp 8-32

The commenter asserts that the DEIR failed to address the project's impacts to the housing market and increased homelessness, including homeless encampments in wildland areas. The commenter also states that mitigation should be provided to ensure sufficient affordable housing nearby for employees. Contrary to the commenter's assertion, the DEIR does analyze the project's impact on housing and concludes that "Nevada County has sufficient available housing stock to accommodate the entire estimated workforce for the project …." (DEIR, p. 4.9-28.) The commenter's assertion that the project could result in homelessness or encampments is speculative, as the commenter provides no evidence that the project, which would create job opportunities, could cause homelessness, or homeless encampments in wildland areas. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As the project will not result in housing shortages, the commenter's proposed mitigation is not required.

Response to Comment Grp 8-33

The commenter asserts that drawdown of groundwater within the underground mine may increase the potential for settlement or collapse of shallow workings. NV5 (Appendix H.6) found that the potential for geotechnical hazards associated with dewatering of the known near surface workings is low. No financial assurance mechanism is proposed, nor is required based on the low potential for any impact associated with the near surface workings. The DEIR analyzed the potential for collapse of the near surface workings in Impact 4.6-3 and concluded that the impact would be less than significant after incorporation of Mitigation Measure 4.6-3(c), which requires closure of



certain near surface mine features. The DEIR's conclusions were peer reviewed by the County's independent expert, who concurred with the conclusions. Mitigation Measure 4.6-3(c) provides clear and enforceable performance standards for closure of the near surface workings, but CEQA does not require engineering level details. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.) Please also see Master Response 29 - Near Surface Workings and Subsidence, and DEIR pages 4.6-12 to 4.6-15.

Response to Comment Grp 8-34

The commenter asserts that there is potential for sinkholes to occur where undocumented mine features exist. However, this statement relates to an existing baseline condition, not an impact of the project. Regarding the settlement previously observed 100 feet south of the mapped location of the Idaho Pump Shaft, NV5 (Appendix H.5) states "Further investigation and physical closure are recommended. Rise and the property owner have entered into a cooperation agreement to allow Rise to assist the property owner to close this feature before or at the commencement of dewatering."

Response to Comment Grp 8-35

The commenter asserts that the DEIR does not clarify liability if an unknown near surface mine working collapses as a result of dewatering. As discussed on page 4.6-44 of the DEIR, potential for collapse of existing near-surface mine features as a result of the proposed project was evaluated by NV5, whose report was independently peer reviewed by ECM. Mitigation Measure 4.6-3© requires the closure of six mine features. This impact was determined to be less than significant after mitigation. Please see Response to Comment Grp 8-33 and Master Response 29 – Near Surface Workings. As there is a low probability of settlement or collapse, the commenter's concern about liability for such collapse is speculation and is not required to be analyzed in an EIR. (See CEQA Guidelines Section 15384.)

Response to Comment Grp 8-36

Please see Master Response 9 - Historical Mine Waste at Centennial Site. Description of the waste rock and mine tailings, including the related analytical data, are presented in Chapter 4.8 of the DEIR and the analysis of air quality and health risk assessment is provided in Chapter 4.3 of the DEIR. Geochemical testwork of mine materials is presented in section 4.4 of Appendix K.2.

Response to Comment Grp 8-37

The commenter states that probability of mine collapse hazards have not been property addressed, because NV5 states that collapse of deep mine features is not likely to be expressed at the ground surface, but does not provide an exact percentage of occurrence. As stated on page 2 of Appendix H.6, near-surface mine features are generally more susceptible to subsidence and collapse than are deeper mine workings. NV5 (Appendix H.6) used professional judgment and experience to arrive at the conclusions presented in the document. Ultimately, the DEIR concluded that risk of collapse for deep mine workings is less than significant after mitigation. The County's independent expert peer reviewed the analysis and concurred with the conclusions.
Please see Master Response 29 – Near Surface Workings.

Response to Comment Grp 8-38

Please see Master Response 29 – Near Surface Workings, and Response to Comment Grp 7-96 regarding seismic activity concerns.

Response to Comment Grp 8-39
Please see the response to the referenced Faulting Hazard comment: Response to Comment Grp 7-96.

Response to Comment Grp 8-40
Please see the response to the referenced CSP2 comment: Response to Comment Grp 7-182.

Response to Comment Grp 8-41
Please see the response to the referenced CSP2 comment: Response to Comment Grp 7-187.

Response to Comment Grp 8-42
Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment 8-43
Please see response to referenced Baseline Comment. Response to Comment Grp 21-122.

Response to Comment Grp 8-44
As stated on page 4.3-89 of the DEIR, The Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and found to be consistent with the EAP. Please see Master Response 25 - Nevada County Energy Action Plan.

Please also see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Grp 8-45
The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a “lifecycle” analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Grp 8-46
The commenter suggests that GHGs associated with the refining of gold concentrates should have been included in the DEIR. This comment pertains to a “lifecycle” analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Grp 8-47
As discussed on page 4.7-26 of the DEIR: A permanent underground explosive storage facility will require the completion of the Service Shaft, to provide two modes of exit from the mine, in accordance with 29 CFR 1926.904(d). Therefore, until the Service Shaft construction is completed, deliveries would be made to the Brunswick Shaft and would be limited to the quantity of explosives needed for less than one week’s use during construction. Explosives would be immediately transported underground once delivered to the site. Temporary auxiliary facilities used to store explosives near underground workplaces will be in compliance with 30 CFR 57.6161 and will be wooden box type containers equipped with covers or doors, or facilities constructed or mined-out, to provide equivalent impact resistance and confinement. The commenter does not identify any impacts not disclosed by the DEIR.

Response to Comment Grp 8-48

Please see Master Response 5 – Evacuation Zones.

Response to Comment Grp 8-49

The commenter asserts that the DEIR does not explain the transportation and storage of the various types of detonators and that the various detonators are not listed in the hazardous materials inventory statement form submitted to the County. Section 4.7-1 of the DEIR discusses detonators and detonating cord and the transport and storage of these explosive types in relation to Hazard Class and Compatibility Group. A hazardous materials business plan is required by Mitigation Measure 4.7-1(d), which will require submittal of a hazardous materials inventory statement listing all hazardous materials that will be stored onsite. As the project has not yet been approved and the various detonators discussed in the DEIR are not in use on the project site yet, the applicant is not yet required to submit a hazardous materials inventory statement that lists those detonators.

Response to Comment Grp 8-50

The commenter asserts that the DEIR needs to analyze the impact of heat generated by curing of concrete used by the project. However, the commenter's assertion that use of concrete in deep underground workings would create an environmental impact due to heat is speculative. The paste backfill method has been in use for about 40 years (see page 26 of Appendix H.7). The commenter provides no evidence or authority that any environmental impact or danger to workers could result. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Portland cement use of 25 tons per day (5% cement content in cemented paste fill) is assumed for the project as disclosed on page 295 of Appendix E.1.

No "heat management mitigations" are required or proposed for the placement of cemented paste backfill, as there is no evidence that any evidence could result. As stated on page 4 of the Itasca Deskstop Study of Cemented Past Backfill, the final formulation of the CPB, including the precise binder amount, binder source, and water content, will ultimately be defined based on rheology and strength characterization testing. This testing program will ensure that the Idaho-Maryland Mine CPB is formulated to set properly and will have sufficient strength for the intended applications within the mine.

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d)). This process would address "long term problems in terms of chemical stability" in relation to impacts to water quality.

The preparation of detailed "thermal impact" calculations from the curing of cement backfill is not required for the purposes of analysing environmental impacts in the DEIR. Any requirements to protect workers from excessive heat would be in accordance with Mine Safety and Health (MSHA) regulations.

Response to Comment Grp 8-51

The commenter asserts that impacts to sealed mine shafts due to dewatering were not properly addressed in the DEIR. However, near surface mine features and potential settlement/collapse due to dewatering are evaluated by NV5 in Appendix H.6 of the DEIR. Please see Response to Comment Grp 8-33.

As shown in Table 3-4 of Appendix K.2, the upper workings (Surface to 580 Level) have an estimated volume of water of 17,878,000 gallons. The water level in the New Brunswick shaft is approximately 257 feet below the top of the collar. The total water drop to 580 level is therefore approximately 323 feet. At the proposed pumping rate of 2,500 gpm, and conservatively assuming no groundwater inflow into the mine, the water in the mine would drop at approximately 2.7 feet per hour.

The water surface elevation in the mine features is expected to drop at a rate of approximately 2.7 feet per hour. This rate of drop is not expected to result in significant forces related to temporary air pressure fluctuation or increased seismicity, as further described by NV5 in Appendix P to the Final EIR.

Response to Comment Grp 8-52

The commenter asks whether the East Eureka Shaft and East Eureka Drain will be closed prior to dewatering of the mine, and also asks if construction will be conducted underwater and/or below the top of Wolf Creek's bank. As required by Mitigation Measure 4.6-3(c) the near surface mine features, except for the South Idaho Shaft, will be closed prior to initial mine dewatering.

As stated in the mitigation measure, the closure design shall include drainage piping for those near surface features that currently discharge groundwater. This reference is to the East Eureka Shaft which currently drains water from the currently flooded Idaho-Maryland Mine. Work will not be conducted underwater or within Wolf Creek. The shaft is under the Navo & Sons building and located approximately 50 feet from Wolf Creek. The building foundation is approximately 5 feet higher than Wolf Creek. Please see the NV5 Memo, provided as Appendix P to the Final EIR.

Response to Comment Grp 8-53

Please see Response to Comment Grp 8-52 and Response to Comment Grp 8-33.

Response to Comment Grp 8-54

As stated in Mitigation Measure 4.6-3(c), the closure design shall include drainage piping for those near surface features that currently discharge groundwater. No concrete would be poured into water, so no interaction with drain water will occur. Please see Response to Comment Grp 8-52.

Response to Comment Grp 8-55

As required by Mitigation Measure 4.6-3(c), the near surface mine features, except for the South Idaho Shaft, will be closed prior to initial mine dewatering. Please see Response to Comment Grp 8-33.

Response to Comment Grp 8-56

No work within a watercourse is proposed for closure of the near surface features.

Response to Comment Grp 8-57

The commenter asserts that water quality impacts related to cement paste backfill is not discussed in the DEIR; however, the commenter's statement is incorrect. The DEIR, at pages 4.8-46 through 4.8-49, discusses the use of CPB for backfill, describing the findings of applicant-submitted studies, third-party studies, and the peer review conducted by the County's EIR consultant team. As noted in the DEIR, "Use of CPB for the project is an environmentally favorable method for tailings disposal because it can significantly reduce any potential release of metals from the tailings and would minimize the area of surface disturbance needed for tailings disposal." (at page 4.8-47, 3rd paragraph). The DEIR also analyzes the potential for hexavalent chromium to be released from the CPB (at page 4.8-47, 4th paragraph). The DEIR concludes that, the use of CPB, along with other water management and treatment methods, and adherence to permit requirements, would avoid significant impacts to water quality. However, the DEIR considers the impacts to be significant prior to mitigation, and includes as mitigation the necessary regulatory requirements that would ensure that the project remains in compliance with water quality standards. These requirements are identified in Mitigation Measure 4.8-1(d), which are consistent with the requirements outlined in the comment letter from the Central Valley Regional Water Quality Control Board, dated April 4, 2022 (see Agency Letter 5). Mitigation Measure 4.8-1(d) requires testing of cement paste backfill for water quality impacts, and submittal of a report of waste discharge to the CVRWQCB at least 6 months prior to use of CPB, and issuance of waste discharge requirements prior to use.

The DEIR has already concluded that the use of CPB could result in a potentially significant impact related to water quality and has provided appropriate mitigation measures, consistent with the requirements of the Central Valley Regional Water Quality Control Board. Given that the DEIR already concludes that the impact could be potentially significant, and provides mitigation with regulatory oversight to ensure adherence to water quality standards, further analysis of the use of CPB is not warranted.

Response to Comment Grp 8-58

The commenter states that the DEIR's assessments of the current mine water chemistry are inadequate. Once mine dewatering commences the flow of water through the mine workings would be altered from its current condition with water pumped up the New Brunswick shaft rather than the current mine drains. Accordingly, the commenter's suggestion that water from the mine drains be used to represent the likely water quality during dewatering would not accurately represent the water quality when the flow is altered. The DEIR's analysis including the scope of water sampling and conclusions regarding water quality were prepared by water quality experts and then reviewed by the County's independent water quality experts, who concurred with the conclusions.

The proposed water treatment plant is designed to remove iron and manganese and arsenic if it were present. Please see Master Response 5 - Discharge to South Fork Wolf Creek. As shown in Table 3.6 of Appendix K.2, zinc in the mine drains ranged from <50 to 94 ug/L and aluminum ranged from <50 to 290 µg/L. Zinc and aluminum from the drains are already less than the low threat discharge permit limits shown in Table 4-10.

The DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measure 4.8-1(a) to address this potential impact. This mitigation measure requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be

received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that the water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals.

Response to Comment Grp 8-59

The commenter asks how the water quality is impacted by existing timbers, whether treated wood products were used in historic mine works, and how water quality has been affected by infrastructure, equipment and spills of chemicals in the existing underground works. The items listed in bullets are related to existing conditions in the underground mine workings and, therefore, are part of the environmental baseline. The water samples collected from the New Brunswick shaft, and from Wolf Creek in 2018 were analyzed for a range of total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and mercury (See Table 3.6 of Appendix K.2). These analyses include the range of industrial chemicals described in the comment, and many others. Other than the occurrence of cis-1,2-dichloroethylene related to documented releases from the former Sierra Pacific Industries operations, there were no detections of any other organic chemicals or mercury. If future mining activity disturbs areas where some unknown residual chemicals currently reside, the monitoring required under the Central Valley Regional Water Quality Control Board WDR permits would detect any exceedances of water quality standards and the treatment systems would need to be modified accordingly to maintain compliance with discharge requirements (see Mitigation Measure 4.8-1(a)). Moreover, dewatering of the mine will allow removal of any equipment that was previously left in the underground mine, which could cause water quality impacts.

Response to Comment Grp 8-60

The items listed in bullets are related to existing conditions in the underground mine workings. No oil products or mercury has been detected by sampling of mine water present in the underground workings. Please see Response to Comment Grp 8-59. CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Grp 8-61

The commenter asserts that the mine water should be tested regularly as dewatering proceeds because of the possibility of contamination caused by oxidation of the underground rock or other contaminants such as mercury. The DEIR has already concluded that the project may have a potentially significant impact on water quality in connection with dewatering and has identified mitigation measures to address these potential impacts. As set forth in Mitigation Measure 4.8-1(a), the applicant is required to construct a water treatment plant to treat mine water to comply with applicable water quality standards prior to discharge into South Fork Wolf Creek. Moreover, the applicant is required to obtain coverage from the RWQCB for such discharge which will require testing and ongoing monitoring. Please see Master Response 5 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 8-62

Please see responses to the referenced "Sample QC Review". Responses to Comments Grp 8-134 through Grp 8-137.

Response to Comment Grp 8-63

Please see responses to the referenced "Sample QC Review". Responses to Comments Grp 8-134 through Grp 8-137.

Response to Comment Grp 8-64

Please see Response to Comment Grp 7-9, and Response to Comment Grp 7-164. Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project. Testwork included Acid Based Accounting (ABA), Total Metals, and California Waste Extraction Testing (WET). The Waste Extraction Test (WET) should be used to determine the amount of extractable substance in waste rock (CCR Title 22 Division 4.5, Chapter 11, Article 5, Appendix II). The overall purpose of the barren rock and tailings sampling and laboratory analysis was to identify the general characteristics of that specific material type. Since the objective was to understand the general character, the number of samples or the length of the samples compared to the total linear feet of core drilled for mineral exploration has no relevance. As such, the results of the barren rock testing provide reliable and representative results for consideration in the DEIR and for assessment of the potential effects of the use of that material for engineered fill and cemented paste backfill.

The DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified mitigation measures to address these potential impacts. Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). Please see Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 8-65

The assumed crystalline silica content and modelling of respirable silica is conservative and overestimates the relevant exposure in any situation. Therefore, sampling of materials for crystalline silica content is not required. Please see Master Response 21 – Conservatism of Silica Assumptions.

Please see responses to the referenced "Sampling Procedures". Responses to Comments Grp 7-155 through Grp 7-173.

Response to Comment Grp 8-66

The commenter asserts that the DEIR incorrectly assesses potential for acid rock drainage, and cites to the arsenic, iron and manganese present in water discharged from the Empire Mine. However, metal content in water from mine drains is a different issue than effluent from mine wastes, and the Empire Mine has different geology than the Idaho-Maryland Mine.

Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project. Testwork included Acid Based Accounting (ABA), Total Metals, and California Waste Extraction Testing (WET). The overall purpose of the barren rock and tailings sampling and laboratory analysis was to identify the general characteristics of that specific material type. Kinetic testing (eg ATSM D 5744) was not conducted but may be done during the RoWD/WDR process. Please see Master Response 8 – Mine Waste Characterisation. However, given the high neutralization potential of the mine materials (see table 4-8 of Appendix



K.2), it is unlikely that kinetic testing would result in the generation of acid resulting in metal leaching.

The DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified mitigation measures to address these potential impacts. Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRWQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). The waste characterization and required testwork may include using kinetic testing. Monitoring requirements will be included in the approved WDR. As such, the further testing that commenter requests will be completed as part of the RoWD process. Please see Master Response 8 – Mine Waste Characterization and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 8-67

Please see response to referenced Baseline comment. Response to Comment Grp 21-109. Please see Master Response 8 - Mine Waste Characterization. The testwork performed on rock samples taken from the project site, and corresponding water quality analysis, was reviewed by the County's experts, who concurred with the DEIR's analysis and conclusions. Further, mitigation measures require further testing as part of subsequent CVRWQCB permitting. As such, the analysis and conclusions in the DEIR are supported by substantial evidence.

Response to Comment Grp 8-68

As discussed on page of Appendix K.2 of the DEIR, the restoration of the post-mining discharge through the drains would be comparable to existing conditions and, thus, not an impact under CEQA. However, once the mine discharge from the drains resumed, additional compliance measures may be required by RWQCB to address Basin Plan, antidegradation, and other water quality standards. These measures might include sealing off areas of the underground workings that are the primary source of arsenic in the existing drain water, sealing the underground workings sufficiently to prevent seepage of water from the connected mine workings, obtaining an Individual NPDES permit upon closure, or treating of the mine water seeps after closure.

Response to Comment Grp 8-69

Please see response to the referenced Baseline comment: Response to Comment Grp 21-112.

Response to Comment Grp 8-70

Please see responses to the referenced Model Review comments: Responses to Comments Grp 7-64 through Grp 7-94.

Response to Comment Grp 8-71

Please see responses to the referenced Model Review comments: Responses to Comments Grp 7-64 through Grp 7-94. In addition, please see Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 8-72

The groundwater model used for the DEIR is appropriate for the fractured rock system at the project site. Please see Master Response 14 – Adequacy of Groundwater Model. The DEIR already provides adequate information and comprehensive analysis to determine the extent and severity of impacts to groundwater resources and wells.

Response to Comment Grp 8-73

Please see response to referenced Baseline comment. Response to Comment Grp 21-110. The commenter mischaracterizes the DEIR's groundwater mitigation to imply that no data is collected or monitoring of groundwater is required until after dewatering commences; however, as required under Mitigation Measure 4.8-2(a) "Implementation of the GMP [groundwater monitoring plan] shall be initiated prior to the dewatering of the mine and on an ongoing basis." As such, the commenter is incorrect that groundwater monitoring and baseline data collection is deferred until after dewatering.

Response to Comment Grp 8-74

Please see responses to the referenced Oberdorfer comments: Responses to Comments Grp 8-127 through Grp 8-133. In addition, please refer to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 8-75

The commenter states that the DEIR incorrectly assesses the transmissivity of the rock due to failure to consider the upper limit of the water level in the New Brunswick shaft. However, the observations presented in Section 3.3.3.3 of Appendix K.2 of the DEIR are not used as the basis for estimating transmissivity values used in the Groundwater Model. This section discusses the water level in the mine which remains relatively consistent with the elevations of the mine drains and is not correlated with rainfall. As the commenter mentions, and is discussed in Section 3.5.2 of the report, the water level in the mine is controlled by the elevation of the mine drains. Domestic wells, discussed in Section 3.3.2.2, show a seasonal fluctuation between wet and dry parts of the year that remained constant over many years. If a domestic well, where ground water levels are higher than the level of water in the mine, were directly connected to the mine workings, the groundwater level in the wells would be controlled by the water level in the mine. As described on page 81 of Appendix K2, the lack of a seasonal pattern in the mine water levels indicates that the mine workings are not directly connected to the wells by through-going fractures but are instead interconnected by a complex pattern of many fractures present throughout the bedrock.

Consumptive water uses from individual wells are not considered because of the lack of consumptive-use data and the fact that consumptive use is small relative to regional groundwater flow. In addition, much of the water pumped for domestic use would be recharged to groundwater by septic tanks/leach fields and landscape irrigation. Please see Itasca clarification memo attached to the Final EIR as Appendix O. In addition, please see Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 8-76

The commenter states that additional data must be collected before the County can accurately model the project's groundwater impacts. Please see Response to Comment Grp 7-23. In addition, please see Master Response 14 - Adequacy of Groundwater Model. The data used for the groundwater model and the conclusions of the groundwater model, as reflected in the DEIR, were peer-reviewed by the County's independent groundwater expert, who concurred with the conclusions of the DEIR. The water level in the mine which remains relatively constant with the elevations of the mine drains and is not correlated with rainfall. The current flow rate from the drains was not used for the preparation of the Groundwater Model and therefore additional measurements would not be relevant to the analysis.

Consumptive water uses from individual wells are not considered because of the lack of consumptive-use data and the fact that consumptive use is small relative to regional groundwater flow. In addition, much of the water pumped for domestic use would be recharged to groundwater by septic tanks/leach fields and landscape irrigation. Please see Itasca clarification memo attached to the Final EIR as Appendix O.

Response to Comment Grp 8-77

The commenter asserts that groundwater monitoring should continue for at least 5 years after the mine is closed and reflooded. However, the commenter does not identify any significant impacts that would be avoided by implementing the suggested mitigation. Monitoring is required on an ongoing basis as stated in Mitigation Measure 4.8-2(a). Therefore, monitoring would continue throughout operations and during mine closure and reclamation.

Once mining is completed, dewatering ceases, and the underground workings are allowed to flood with groundwater and are anticipated to refill over several years. No further impacts to water levels in domestic wells could occur during this period. As discussed on page 119 of Appendix K.2, after mining ceases, conditions would return to those that currently exist. The proposed new! mining activities would all occur at depths that are comparable to or much deeper than the historic! mine workings. Due to the substantial reduction in hydraulic conductivity at those depths,! compared to the depths of the domestic supply wells, it is highly unlikely that the proposed project! would affect water quality in the nearby much shallower groundwater wells. The arbitrary selection! of 5 years of monitoring after mine closure and reflooding is not supported by the analysis.! However, there will be water quality specific financial assurances for closure and post-closure! maintenance of mining units as required by Title 27 section 22510. This may include the need for! post closure water monitoring. This issue will be addressed in the approval of the WDR required! by Mitigation Measure 4.8-1(d) and 4.8-1(e).

Response to Comment Grp 8-78

Please see Response to Comment in Group Letter 7, Response to Comment Grp 7-80.

Response to Comment Grp 8-79

Please see Response to Comment in Group Letter 7, Response to Comment Grp 7-82.

Response to Comment Grp 8-80

Please see Response to Comment in Group Letter 7, Response to Comment Grp 7-83.

Response to Comment 8-81

Please see response to the referenced Baseline comment: Response to Comment Grp 21-119. In addition, please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 8-82

The commenter, in part, quotes a comment from Baseline Engineering in Group Letter 21, stating that the project's potential impacts to groundwater wells are underestimated and that the proposed mitigation is inadequate. Please see response to the referenced Baseline comment: Response to Comment Grp 21-118.

The DEIR already provides adequate information and comprehensive analysis to determine the extent and severity of impacts to groundwater resources and wells. An appropriate groundwater model was used to predict impacts to domestic water wells (See Master Response 14 – Adequacy

of Groundwater Model). However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). Ongoing groundwater monitoring would be required, and groundwater-level information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis and submitted in report form to Nevada County.

The commenter references County General Plan Policy 17.12, which requires a mine operator to guarantee a supply of replacement water when "according to expert opinion" the operation may threaten quality or quantity of water. Consistent with this General Plan Policy, Mitigation Measure 4.8-2(b) requires, if based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the Project Applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified. The Well Monitoring Plan is designed to predict impacts to domestic water wells before they occur. Please see Master Response 15 – Adequacy of Groundwater Monitoring.

The commenter asserts that because "expert opinion" provided in comments on the DEIR disagree with the DEIR's conclusions and the conclusions of the County's independent water supply experts, that under the General Plan policy, the County must agree with the commenters and determine that the DEIR's groundwater model is flawed. However, where there is a disagreement among experts, the County has discretion to determine which expert opinion is most reliable in the context of an EIR. CEQA case law has been clear for decades that a disagreement among experts does not make an EIR inadequate. (See, e.g., *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396; CEQA Guidelines § 15151.) As the California Supreme Court has explained, a reviewing court's task is not to weigh conflicting evidence and determine who has the better argument. (*Ebbetts Pass Forest Watch v. California Dept. of Forestry & Fire Prot'n.* (2008) 43 Cal.4th 936, 944.) Rather, a court "must resolve reasonable doubts in favor of the administrative finding and decision," even though other conclusions might be reached from the same body of evidence. (*Laurel Heights Improvement Assn., supra,* 47 Cal.3d at p. 422; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 [a court "may not set aside an agency's approval of an EIR on the ground that an opposite conclusion would have been equally or more reasonable"].)

As such, the County has determined that the groundwater supply analysis provided in the DEIR, and as peer-reviewed by its own independent experts is accurate, despite disagreement by commenters.

Response to Comment Grp 8-83

The commenter alleges that the project's discharge of water into South Fork Wolf Creek will overheat the creek. Please see Master Response 32 – Temperature of Mine Water Discharge.

Response to Comment Grp 8-84

Please see Master Response 32– Temperature of Mine Water Discharge.

Response to Comment Grp 8-85

Please see Master Response 32– Temperature of Mine Water Discharge.

Response to Comment Grp 8-86

Please see Master Response 32– Temperature of Mine Water Discharge.

Response to Comment Grp 8-87

The commenter asks what the impact of using the existing clay-lined pond for pumping of mine water will be on waterfowl, riparian habitat and whether mitigation will be provided. The commenter also states that there is currently outflow from the pond into South Fork Wolf Creek; however, there is no outflow from the clay lined pond at the Brunswick site to South Fork Wolf Creek. The referenced pond is not a natural water feature, but instead is an artificial pond constructed for previous sawmill operations at the site. As discussed in Section 5.4 of Appendix K.4, the quantity of Fe, and to a much lesser extent Mn, removed from the mine waters by aeration treatment and stored in (settled to the bottom of) the pond is relatively small. Periodic backwashes of the media vessels will release filtered and adsorbed solids. The backwashes will be directed to a mechanical solids removal system and stored in containers rather then directed back into the pond. The mass of solids removed during backwashing is small, estimated at 3 kg to 10 kg per day (page 44 of Appendix K.4). The purpose of the water treatment system is to improve the quality of mine water. Aeration in the pond will cause most iron to precipitate from its dissolved state in the water and settle towards the bottom of the pond. If arsenic is present it would precipitate with the iron. Manganese would primarily be removed in the water treatment plant and would not be backwashed into the pond. Therefore, water in the pond will have less iron, arsenic, and manganese than water from the mine.

As stated on page 4.4-15 of the DEIR: "*A man-made clay lined pond (PD-1) associated with previous saw milling operations does not have a direct outlet or connection to the South Fork Wolf Creek. PD-1 receives its water mainly from surface runoff and precipitation. PD-1 was used previously as a recycling pond for site runoff containment and log watering during mill operations. PD-1 is non-jurisdictional pursuant to federal Clean Water Act (CWA) regulations given it receives water from sheet flow within the Brunswick Industrial Site and does not connect directly or indirectly with South Fork Wolf Creek or any other 'waters of the U.S.'.*" As stated above, the water treatment pond is an artificial pond constructed for industrial uses. As such, the pond berms are not riparian areas and vegetation on the structure will be removed. Untreated water in the pond would not be released to the environment. No mitigation to replace habitat in the pond is proposed nor required. As discussed in Section 3.4.1.1 of Appendix K.2, the water in the mine contains only Iron and Manganese above water quality guidelines. In the case of Iron and Manganese, water quality guidelines are based on the secondary drinking water standards (taste and odor) and neither has maximum contaminant level (MCL) for aquatic life. Furthermore, acute toxicity test conducted on water from the New Brunswick shaft had a 100 percent survival rate for rainbow trout (see page 41 of Appendix K.2). Ammonia, from explosives use, could be present in mine water during operations but would be removed during water treatment by aeration in the water treatment pond (see page 4-5 of Appendix K.4).

Response to Comment Grp 8-88

Service water for the mine would be from the water treatment plant, and will therefore be treated water. The requirements for treatment of contaminants under the limited threat permit are equal to or better than drinking water standards. Regarding discharge of contaminants into the environment from the pond, see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 8-89

The commenter asks whether water will be tested before use in cemented paste backfill. Cemented paste backfill is non-draining and uses some water for cement hydration and retains the remaining water within its matrix (see page 2 of the Cemented Paste Backfill Study). Given that no water would drain from the cemented paste backfill, the water used in cemented paste backfill could not cause future groundwater contamination, and testing of process water is not required. Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d). This process would require that effluent from backfill meets water quality goals.

Response to Comment Grp 8-90

As discussed in the DEIR (page 4.11-36), water used for dust suppression would be treated water from the water treatment plant or water purchased from the Nevada Irrigation District. Untreated mine water would not be used for this purpose.

Response to Comment Grp 8-91

Odor from the water treatment pond has been analyzed and found to be less than significant (see page 56 of DEIR Appendix E.1). No air quality impacts are expected from the aeration process, and no evidence has been provided that any potential for impacts exist.

Response to Comment Grp 8-92

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). The requirements for testing and materials management, to ensure water quality goals are achieved, will be specified in the approved WDR.

Water used for dust suppression would be treated water from the water treatment plant or water purchased from the Nevada Irrigation District. Untreated mine water would not be used for this purpose. Please see Master Response 1 - Engineered Fill Utilized in Local and Regional Construction Markets; and Master Response 8 - Mine Waste Characterization.

Response to Comment Grp 8-93

The commenter asserts that the water treatment pond will need to be drained and cleaned periodically to remove sediment; however, this is not correct. As discussed in Section 5.4 of Appendix K.4 to the DEIR, the removal of sludge from the water treatment pond can be achieved with slurry pumps. Therefore, the periodic removal of settled solids would not require the curtailment of mine dewatering or the draining of the water treatment pond.

As stated on page 5-3 of Appendix K.4 to the DEIR, the solids removed from the water treatment pond will be dewatered and hauled to an appropriate and approved off-site landfill. Testing will be conducted in accordance with the sampling requirements and acceptance criteria of the landfill.

Response to Comment Grp 8-94

The commenter asserts that the use of the New Brunswick Shaft is not proper because of the proximity to a known fault, and that the main processing and access facilities should instead be placed on the Centennial Site. As discussed in Section 4.5-1 of the DEIR, based upon substantial



evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85. The County's independent geotechnical consultant agreed that the removal of this setback is proper, given the lack of evidence to indicate an active fault at this location (see pages 4.6-3 to -5 of the DEIR).

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint.

While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

The commenter also suggests that the County should consider placing the access shafts and processing facilities on the Centennial Site rather than the Brunswick Site because Emgold previously planned to do so and that multiple access points from different parts of the mine provides better emergency access and ventilation. A vertical shaft at the Centennial site is not a practical solution as it is far west of the area of mineralization at depth (See sheet 15 of Appendix K.2) and would intersect the serpentinite rock unit (see Sheets 5-7 of Appendix K.2), causing potential geotechnical issues. The 2008 Emgold DEIR[3] proposed to construct a decline tunnel from the Centennial site to access the underground mine and haul rock from underground to surface using trucks (See page 2-23 of ESA 2008). A decline tunnel must be at a gradient allowing wheeled trucks to haul materials to surface, typically 10% to 15% grade, and therefore is much longer than a vertical shaft which greatly increases the energy required to move materials to surface versus a shaft. Significantly more rock excavation volume would also be required for a decline tunnel versus a shaft. If the process plant were located at the Centennial site very little or no engineered fill could be placed at the Centennial site and all fill would be hauled and placed on the Brunswick site. The process plant would be further from residential properties. However, the DEIR has analyzed noise, air emissions, odor and other impacts associated with the currently proposed location of the process plant which are already less than significant after mitigation. Moreover, The commenter does not identify any significant impacts that would be avoided by adopting the suggested alternative and the proposed alternative would likely increase impacts; therefore, this proposed alternative is dismissed from further consideration.

Response to Comment Grp 8-95

Please see response to referenced faulting hazard comment: Response to Comment Grp 7-96.

Response to Comment Grp 8-96

The Commenter asserts that a variance should be denied relating to the building setback from a fault. However, the applicant is not requesting a variance from the setback requirement, but rather

[3] ESA (Environmental Science Associates). (2008). *Draft Idaho-Maryland Mine Project Environmental Impact Report* San Francisco, California.

is requesting that a note on the subdivision map referring to the setback be removed given the lack of evidence supporting the existence of an active fault at this location.

Response to Comment Grp 8-97

The commenter asserts that alternative land uses are not adequately discussed in the DEIR, and claims that a project consistent with the existing zoning would be more appropriate for the site. As stated on 6-13 of the DEIR, numerous industrial uses are already allowed on the Brunswick Site without the need for a use permit from the County, such as Auto Dismantling Yards and Wholesaling and Distribution Facilities. The DEIR discloses that these types of uses could cause substantial noise, traffic, aesthetic and air quality impacts without the need for further CEQA review or mitigation, as discretionary permits are not required for those uses. Given that the existing zoning allows uses that could likely be more intense and impactful than the project in numerous resource areas (e.g., noise, air quality, traffic), the County dismissed this Alternative from further consideration (DEIR p. 6-13.). Please also see Response to Comment Grp 21-104.

Response to Comment Grp 8-98

As stated on page 4.9-3 of the DEIR, "While the majority of the Sites are located in the City's sphere of influence and assigned General Plan land use designations by the City, the Sites are located within unincorporated Nevada County and are not proposed to be annexed to the City of Grass Valley." The County evaluated potential land use conflicts in Chapter 4.9 of the DEIR and concluded that potential land use conflicts were less than significant.

Response to Comment Grp 8-99

The commenter states that the DEIR must determine whether the dumping of mine waste is a heavy industrial activity. As stated on page 4.9-16 of the DEIR, Surface mining, including the production and disposal of mining waste, are allowed in the M1 (light industrial) district where the property is Zoned ME, subject to the approval of a Use Permit. The Brunswick site will be zoned M1-ME if the project is approved. The objective of the placement of engineered fill, over approximately 5 years, at Centennial site is to increase the usable land area at the Centennial site to allow its future use as industrial land (see page 3-12 of the DEIR) and no other activities are proposed for this site ;therefore, this is properly considered a construction activity allowed on the Centennial site. As stated in Section L-II 3.22 D.4.b of the Nevada County Land Use and Development Code, on-site excavation and on-site earthmoving activities which are an integral and necessary part of a construction project that are undertaken to prepare a site for construction of structures, landscaping, or other land improvements, including the related excavation, grading, compaction, or the creation of fills, road-cuts, and embankments are exempt from Section L-II 3.22 and the requirement for ME zoning.

Response to Comment Grp 8-100

The culvert present at the Brunswick site is part of the existing condition and prior permitting for construction is not relevant to the analysis for the DEIR.

Recorded easements on the Brunswick site have been plotted by a Licensed Land Surveyor. No project activities are proposed in the location of the 100-foot NID spill easement.

https://www.nevadacountyca.gov/DocumentCenter/View/30408/Brunswick-Site-Easements---NCE

Response to Comment Grp 8-101

The commenter asserts that the DEIR should analyze the "Weimar" fault and show the location of proposed structures in relation to this fault. As discussed in Section 4.5-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85. The County's independent geotechnical consultant agreed that the removal of this setback is proper, given the lack of evidence to indicate an active fault at this location (see page 4.6-4 of the DEIR).

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint.

While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

Response to Comment Grp 8-102

The commenter states that a map with the South Idaho Shaft shown in relative location to Pine Hill flannelbush locations must be provided to protect these plants. The South Idaho Shaft is inside the area of proposed placement of engineered fill at the Centennial site, and a total of 18 plants will be transplanted under Mitigation Measure 4.4-1(a). Impacts to flannelbush plants have therefore already been analyzed in the DEIR, mitigation has been provided, and the DEIR concluded that impacts would be less than significant after mitigation (See DEIR, Impact 4.4-1). In addition, please see Response to Comment Grp 8-24.

Response to Comment Grp 8-103

A map showing the mineral rights area is included as Figure 3-2 to the DEIR. There is no requirement that a map identifying each parcel within that area be provided.

Response to Comment Grp 8-104

Please see response to referenced Salter comment. Response to Comment Grp 21-130.

Response to Comment Grp 8-105

Please see response to referenced Salter comment. Response to Comment Grp 21-131.

Response to Comment Grp 8-106

Please see response to referenced Salter comments. Responses to Comments Grp 21-142 through Grp 21-144.

Response to Comment Grp 8-107

The comment expresses concern with blasting vibrations and long-hole stope blasting, which was studied extensively in the DEIR. Note that the commentor incorrectly refers to stope blasting as "slope" blasting. Vibrations from long hole blasting are discussed extensively in Section 4.10-4 of

the DEIR and Appendix M of the DEIR and are determined to be less than significant. (DEIR pp. 4.10-26, 4.10-52, and Table 4.10-23.) As shown in Table 4.10-22 and Table 4.10-23, all groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the USBM recommendations and the levels at which structural damage to buildings is possible (see Table 4.10-9). Drift development blasts at the shallowest depth considered of 500 feet would be barely perceivable to the general population and undetectable by instrumentation below 900 feet in depth. Larger longhole stoping blasts at the shallowest depth considered of 500 feet would be 0.23 in/s, which is also well below the threshold level of vibration (0.4 in/s). (DEIR p. 4.10-54.)

The maximum potential noise and vibration caused by falling rock is trivial in comparison to what has already been analyzed in the EIR. Please see Response to Comment Grp 8-108.

Response to Comment Grp 8-108

This comment alleges that ground vibrations from falling rock in the new access shaft should be considered. As discussed on page 3-22 of the DEIR, the proposed service shaft excavation in rock would be constructed from the underground mine workings upward to the surface through a process called 'raising'. The raise excavation could be completed using either mechanical raise boring or Alimak raising. Raise boring is carried out using a raise bore machine located on the surface. A drill hole is made from the surface to the underground workings. After a cutting head is attached underground to the end of the drill pipe, the raise bore machine pulls the rotating cutting head upward to create a circular excavation in a continuous process. Alimak raising is carried out using drilling and blasting. The raise is blasted from the bottom upward. Rails are attached to the wall of the raise so that an Alimak raise climber can lift the miners to the working face. An Alimak raise is advanced with each blast in segments of approximately 10 feet.

Ground vibration from construction of the service shaft is analyzed in section 5.0 of DEIR Appendix M. The highest levels of ground vibration will be that produced from the breakthrough round, as this has the least amount of vertical distance between the blast and the surface. While this round will be 50 ft below surface it will be blasted to the surface. This is an extremely conservative estimate both in the magnitude of estimating the ground vibration and assuming there is no vertical relief. (DEIR p. 4.10-58.)

The ground vibration from this single shot would not be expected to cause damage to industrial structures adjacent to the raise breakthrough round or residences in the area. At maximum, the ground vibration at the nearest receptor is expected to be 0.13 in/s which is well below the 0.4 in/s recommendation for human perception. (DEIR p. 4.10-58; see also DEIR Table 4.10-9.)

Air overpressure from construction of the service shaft is analyzed in the Technical Blasting Report section 5.0 of DEIR Appendix M. The single breakthrough round from the shaft may produce air overpressure of 126 dB, which is approximately 50% of the U.S. Bureau of Mines recommendations. The U.S. Bureau of Mines and the Office of Surface Mining, Reclamation, and Enforcement (OSMRE) have both developed recommendations for ground vibration levels to prevent damage to residential structures. These recommendations will be strictly followed by the project. Regarding site-specific analysis and recommendations, Dr. Konya of Precision Blasting Services recommended a threshold level of 0.4 in/s PPV for the Idaho-Maryland Mine project. (DEIR p. 4.10-21; See also DEIR Table 4.10-9.)

During the construction of the Service Shaft, assuming it is constructed by Alimak raising, rock would fall up to 1,000 feet inside the excavation after blasting. Section 7 of the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (September, 2018) provides guidance for evaluating noise and vibration during construction activities. (DEIR p. 4.10-20.) While it does not provide reference data for evaluating vibration levels for falling rock, it does provide data for impact-type pile drivers which is analogous to vibration levels from falling rock. Table 7-4 on page 184 of the FTA publication reports a maximum vibration level of 1.5 in/sec peak particle velocity for impact-type pile driving activities at a distance of 25 feet from the location where impact would occur. This level of vibration is trivial in comparison to the level of vibration already analyzed for the concurrent detonation of explosives. Assuming a charge weight of 42.1 pounds and the formula presented on page 6 of Appendix M of the DEIR, the PPV from the blast at 25 feet can be calculated at approximately 15 in/sec. The charge weight for a longhole blast is assumed at 133 pounds and PPV at 25 feet can be calculated as above at 28 in/sec. As seen from the foregoing, the maximum potential vibration caused by falling rock is trivial in comparison to what has already been analyzed in the DEIR. Noise from falling rock at the blasting area would also be far lower than noise from the explosive's detonation and noise from blasting at sensitive receptors on surface is less than significant (see page 4.10-44 of the DEIR). Therefore, noise from falling rock would also be less than significant.

Response to Comment Grp 8-109

The commenter asks how long the construction of the new access shaft will take, how long after initiation of site construction before the access shaft will be constructed, and how long after the initial dewatering of the mine the shaft will be constructed. The service shaft must be completed before production mining can commence in accordance with MSHA regulations. Construction of the access shaft is generally expected to take 12 months. However, the precise timing will be dependent upon the timing necessary to obtain other ancillary permits and approvals, which cannot be known precisely in advance. The exact timing of access shaft construction is not necessary for the analysis of environmental impacts in the DEIR.

Response to Comment Grp 8-110

The recommendation cited by the commenter was incorporated into Mitigation Measure 4.10-4 of the DEIR.

Response to Comment Grp 8-111

Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Grp 8-112

As described in Section 3.0 of the DEIR, after full placement of fill at the Centennial and Brunswick Industrial sites to the pad design elevations, hauling of engineered fill (barren rock and sand tailings) would shift entirely to be utilized in local and regional construction markets. Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

No large-scale temporary storage facilities are proposed for the project, and placement of such stockpiles would not be allowed under the project's conditional use permit. The project includes temporary storage of materials at the Brunswick Shaft, inside the process plant, and at the Brunswick and Centennial sites where material would be dropped by trucks and later graded and compacted during weekday daylight hours.

Response to Comment Grp 8-113

Please see Group Letter 7, Response to Comment Grp 7-3, and Master Response 24 - Project Construction Schedule.

Response to Comment Grp 8-114

The southwest portion of the water treatment pond berm would be excavated and rebuilt before dewatering commences; and the clay liner of the pond will be covered with a geomembrane liner to ensure no seepage from the pond occurs. (See page 3-17 of the DEIR). The impacts of the project construction to surface waters and wetlands have already been assessed in the DEIR and mitigation measures are required to reduce impacts to a less than significant level. (See Impact 4.4-3 of the DEIR.) The pond would be drained to allow the reconstruction of the berm and installation of the liner. If the water is discharged to South Fork Wolf Creek, it would be required to be in compliance with the approved Notice of Applicability (Please see Master Response 35 – Discharge to South Fork Wolf Creek). Alternately, the water drained from the pond may be discharged to land (and recharge into the ground) under the requirements of the Construction Stormwater Pollution Prevention Plan (C-SWPPP) required by Mitigation Measure 4.8-1(b) of the DEIR.

Response to Comment Grp 8-115

The headframe height is required to lift the rock skips high enough to drop hoisted rock into the existing shaft silo. The process plant height is required for the tailing dewatering sections where materials use gravity flow and sufficient height is needed for the various machinery. Placement of these structures below ground is not technically feasible, as the bottom of the structures need to be accessible at surface level to allow loading of trucks. As such, the suggested mitigation is not considered further due to infeasibility.

Response to Comment Grp 8-116

This comment summarizes the prior comments and generally asserts that the DEIR is inadequate and needs to be recirculated. The commenter's specific comments are addressed in Responses to Comments Grp 8-1 to Grp 8-117.

Response to Comment Grp 8-117

This comment appears to be referring to a similarly titled attachment to Group Letter 7. Please see Responses to Comments Grp 7-64 to Grp 7-94.

Response to Comment Grp 8-118

Please see responses to the referenced Oberdorfer comments: Responses to Comments Grp 8-125 through Grp 8-131.

Response to Comment Grp 8-119

Please see responses to the referenced Mine Exhaust Moisture comments: Response to Comment Grp 7-95.

Response to Comment Grp 8-120

Please see responses to the referenced Faulting Hazards comments: Responses to Comments Grp 7-96 to Grp 7-102.

Response to Comment Grp 8-121

Please see responses to the referenced ASUR Plan Analysis: Responses to Comments Grp 7-103 through Grp 7-137.

Response to Comment Grp 8-122

Please see responses to the referenced Health Risk Assessment Critique comments: Responses to Comments Grp 7-138 through Grp 7-154.

Response to Comment Grp 8-123

Please see responses to the referenced Sampling Procedures comments: Responses to Comments Grp 7-155 through Grp 7-172.

Response to Comment Grp 8-124

Please see responses to the referenced Baseline Environmental Consultant Report: Responses to Comments Grp 21-107 to Grp 21-128.

Response to Comment Grp 8-125

Please see responses to the referenced Salter Report comments: Responses to Comments Grp 21-129 to Grp 21-145.

Response to Comment Grp 8-126

Please see responses to the referenced Center for Science in Public Participation comments: Responses to Comments Grp 7-174 through Grp 7-201.

Response to Comment Grp 8-127

This comment is a summary of comments Grp 8-128 to Grp 8-133. Please see Responses to Comments Grp 8-128 through Grp 8-133. The commenter asserts that the groundwater model is flawed because it does not include shallow groundwater levels in 1956 towards the end of historic mining.

The commenter is confused on several main issues.

1) The commentor believes that drawdowns are shown relative to 1956 when the mine was dewatering. This is incorrect. The drawdowns are shown relative to 2019 (or current) ground water levels. The reason for using 2019 groundwater levels is because they are the equilibrium conditions under current landscape and hydrogeologic conditions. All water supplies of domestic wells are controlled by the current water levels not the 1956 water levels.
2) The commentor is confused between the level of water in the mine and the groundwater level. The groundwater level is influenced by the level of water in the mine (creating drawdown cones) but they are not the same. In most mining operations, the water level in the mine is below the mine working in order to maintain the dry working conditions. Because the rock has low hydraulic conductivity, there will be a large difference between the groundwater levels in the rock mass and groundwater level in the mine working. The lower the permeability is, the larger the resistance from groundwater in the surrounding rocks mass to flow to the mine workings is and, consequently, the larger difference between groundwater levels in the rock mass and mining working is.
3) The commenter is using a different definition of “initial condition” than is used by Itasca in the Groundwater Model Report. The commenter believes that “initial condition” is the

baseline for the measurement of project impacts. This is not correct. This point is explained in Bullet Item 1.

As the commenter is mistaken about the groundwater model that was used in the DEIR, the commenter's specific critique of the model is based on a misunderstanding. The groundwater model was calibrated by experts in groundwater modelling and peer-reviewed by the County's own groundwater experts and constitutes substantial evidence of the DEIR's conclusions.

Response to Comment Grp 8-128

The commenter states that the groundwater model is flawed because of the initial conditions assumed by the model; however, the commenter misunderstands how the groundwater model works and is therefore mistaken. As explained in Section 4.0 of Appendix K.3, the initial condition was modelled in the following general sequence:

1) Simulation of pre-historical mining conditions (before any mining had taken place). No groundwater levels are available for the model calibration of pre-historical-mining groundwater conditions. Itasca assumed that 2019 water levels outside of the Mine area are close to those of the pre-historical-mining condition after more than 60 years of recovery. This assumption is supported by the available hydrographs from domestic wells (Todd 2007), which show that groundwater levels were generally stable from 1994 to 2007 with seasonal variations. Therefore, it is reasonable to use these measured water levels for the calibration of the pre-historical groundwater levels-
2) Simulation of historical mining. Using the simulated groundwater levels of the pre-historical mining condition, Itasca calibrated the model using the known inflow rates and underground mine workings from two periods of mining. The Idaho mine in 1918 and the entire connected Idaho-Maryland-Brunswick mine in 1956. The model was also calibrated against the known level of water in the Union Hill mine in 1956. (Section 4.6 pages 21-22)
3) Recovery of groundwater level after the cessation of historical mining to present day. The drain nodes for the historical mine workings were turned off and mine voids were simulated with a zone of high K and the drains along Wolf Creek (which currently drain the mine) were added at their known elevation. (Please see Itasca Clarification Memo attached to the Final EIR as Appendix O). The simulated recovered water levels were then compared against the water levels measured in wells in the mine area from 1994 to 2007. Measured groundwater levels from the domestic wells are not available since 2007. However, it is reasonable to assume that these groundwater levels are somewhat stable with the exception of seasonal fluctuations, as no major pumping (stresses) has occurred since 2007. The model was found to be calibrated to the assumed current (2019) measured water levels. (Section 4.5 page 22).
4) The simulated 2019 (current condition) water levels are the baseline for measuring impacts from the proposed project. This baseline models the current situation of groundwater draining from the mine working into Wolf Creek and under the current hydrogeologic condition.
5) The simulated water levels after the mine is dewatered by the proposed project would be similar to the water levels in 1956 at the end of the historical mining. Therefore, it is reasonable to assume the predicted drawdown at the end of dewatering of the existing mining workings as proposed by the project will be similar to the drawdown at the end of the historical mining in 1956. Additional drawdown will occur due to the planned future mining of the project. Therefore, the simulated groundwater levels in 1956 are used as the

initial condition for predicting the effects of new mining proposed by the project. (Section 5.1 page 23)

The commenter refers to Figure 5-7, but it appears that reference is in error. Figure 5-7 of Appendix K.3 shows the change in baseflow rate in creeks over the life of the mine. Presumably the commenter is referring instead to Figure 5.4 which shows the simulated groundwater drawdown contours at the end of future mining (25 years) relative to the 2019 water level.

The commenter states "the incremental drawdown from increasing dewatering from 700 gpm to the future rate of 900 gpm is what is reflected in the map of impact." The commenter previously indicates that dewatering at a rate of 700 gpm = the water levels at the end of mining in 1956; however, the commenter is incorrect. As is explained in bullet 4 above, the baseline used is the 2019 (current condition) and not the 1956 water levels (dewatered mine). The title block of Figure 5.4. clearly states "Relative to 2019 Water Level".

Figure 5.4 is a large-scale figure but shows a small drawdown cone at the Union Hill mine. Sheet 12 of Appendix K.2 of the DEIR (which is plotted from Itasca's data) shows more definition with a 10-foot drawdown contour at the location of the Union Hill Mine shaft. This is more than the few feet stated by the commenter. The groundwater drawdown is the relative level of the groundwater and not the level of water that is in the mine shaft. The commenter is confusing the historic level of water level in the Union Hill mine shaft (20 feet) with the ground water level in the area of the shaft. Furthermore, as discussed in bullet 2 of this response, the model was specifically calibrated against the historic water level in the Union Hill Shaft.

The commenter appears to confuse directions in its comment by claiming that the New Brunswick shaft is west of the Union Hill mine. The New Brunswick shaft is east of the Union Hill mine rather than west. Additionally, the commenter confuses the water level in the shaft/mine workings with the ground water level. As previously explained, the commenter is incorrect about the baseline which was used for predictive modelling. The initial condition is not the baseline as explained in bullets 4 and 5 of this response.

As the commenter is mistaken about the groundwater model that was used in the DEIR, the commenter's specific critique of the model is based on a misunderstanding. The groundwater model was calibrated by experts in groundwater modelling and peer-reviewed by the County's own groundwater experts and constitutes substantial evidence of the DEIR's conclusions.

Response to Comment Grp 8-129

Please see Responses to Comments Grp 8-127 through Grp 8-128. The baseline used is the 2019 (current condition) and water drawdowns shown and used to determine impacts are relative to the 2019 (current condition) and not the dewatered mine (as at 1956 and after initial dewatering by the proposal project). As the commenter's understanding of the groundwater model's assumptions are incorrect, the commenter's conclusions about the effects of dewatering are also incorrect.

Response to Comment Grp 8-130

The commenter asks for a drawdown map and groundwater elevation contour map for the shallow aquifer based on 1956 conditions before cessation of dewatering. To provide additional clarity on the impact of the project to groundwater levels, Sheet #16 has been attached to the Final EIR which shows relative ground water levels after initial mine dewatering (before new mining

commences) which is the same as modelled groundwater levels in 1956. The information provided in Sheet 16 is consistent with the analysis in the DEIR and does not change any impact analysis.

Response to Comment Grp 8-131

The commenter requests detailed hydrographs of simulated water levels from 1920 (When the Idaho mine was dewatered) through 2020 (current condition) and for 25 years of planned mining. The commenter requests these for the location of wells WS95, WS216, WS201, WS80, WS91, and WS85 on Figure 2-6 of Appendix K.3. The wells chosen by the commenter are the wells highlighted in the figure and spread over several miles in or near the mineral rights area for the project.

The hydrographs requested by the commenter are not necessary because the goal of the predictions is to show the location and the magnitude of the estimated drawdowns. The commenter does not explain how the hydrographs would be used or how they would alter the conclusion in the DEIR that the project could have a potentially significant impact with respect to groundwater supplies.

The goal of the predictions prepared in the groundwater model is to show the location and the magnitude of the estimated drawdowns relative to the baseline (2019 current condition) in order to determine the potential impact of the project to domestic water wells. Simulated drawdown contour maps, relative to the baseline, have been produced for all relevant periods of the project.

Response to Comment Grp 8-132

The commenter requests a detailed model water budget (all volumetric water inputs and outputs) for the general area of the mineral rights from 1920 (When the Idaho mine was dewatered) through 2020 (current condition) and for 25 years of planned mining in one-month increments.

The goal of the requested water budget is not apparent. The commenter does not explain how monthly water budgets would be used or how they would alter the conclusion in the DEIR that the project could have a potentially significant impact with respect to groundwater supplies.

The goal of the predictions prepared in the groundwater model is to show the location and the magnitude of the estimated drawdowns relative to the baseline (2019 current condition) in order to determine the potential impact of the project to domestic water wells. As the DEIR already concluded that the impact could be significant, and estimates drawdown in the vicinity of the project site, a water budget is not necessary to complete this goal.

Response to Comment Grp 8-133

The commenter asks that the model should be run using 2019 water levels as the initial conditions for predictive simulations. However, the model already shows impacts relative to the 2019 (current conditions). The commenter is using a different definition of “initial condition” than is used in the Itasca Groundwater Model Report (Appendix K.3). Please see Responses to Comments Grp 8-128 and Grp 8-129.

Hydrographs are not necessary for the analysis. Please see Response to Comment Grp 8-131.

Water budgets are not necessary for the analysis. Please see Response to Comment Grp 8-132.

Response to Comment Grp 8-134

The commenter questions the validity of the DEIR's conclusions, because of the amount of time that the samples were held prior to testing. As noted in the comment, SW-846 provides guidance but is not applicable in all situations. Furthermore, as noted in the EPA Memo 7 related to SW-846 (https://www.epa.gov/sites/default/files/2015-10/documents/memo7.pdf):

> "SW-846 contains the analytical and test methods that EPA has evaluated and found to be among those acceptable for testing under subtitle C of the Resource Conservation and Recovery Act (RCRA). In most situations, SW-846 functions as a guidance document setting forth acceptable, although not required, methods to be implemented by the user, as appropriate, in responding to RCRA-related sampling and analysis requirements. The methods are intended to be used and modified, as needed, to promote unbiased, sensitive, precise, comparable, and specific analyses and test results. In addition, with the exception of method-defined parameters (e.g., Method 1311, the Toxicity Characteristic Leaching Procedure), SW-846 methods need not be applied in a prescriptive manner. "

Notably, the SW-846 guidance was specifically developed for use in evaluating the presence of human-created hazardous wastes under programs related to the Resource Conservation and Recovery Act. Its application has since expanded to include Superfund evaluations and other sites related to man-made releases of toxic substances. Due to the prevalence of these types of sites, the guidance provided by SW-846 became standard operating procedure for analytical laboratories. However, the sample holding times and preservation methods are not universally applicable under all conditions.

The baseline evaluations conducted for the Idaho-Maryland Mine were conducted on native materials (surface water, groundwater, rock) and were not part of an analysis related to RCRA or to assess the presence of existing waste materials. Thus, the guidance in SW 846 is just that, guidance, but it does not represent a strict set of procedures that must be followed for the data to be usable for the purposes of this EIR.

The analyses related to metals were conducted on native geologic material that have been present in the environment for many millions of years. The purpose of the testing was to assess the potential for actions related to the proposed project to mobilize naturally-occurring metals within the minerals in the rock. The time between collection of the rock sample and the lab analysis, and the temperature at which the rock samples were stored or transported, has no effect on the presence or mobility of the naturally occurring metals within the rock itself. This is in stark contrast to the sampling that is typically conducted under the programs, such as RCRA, for which SW 846 was developed. In those cases, the sampling and analysis is typically intended to evaluate the presence of chemicals that were added by human activity and whose presence and nature tend to be transient. As such, the hold times for the rock samples do not affect the validity of the results or the validity of the DEIR's analysis.

Response to Comment Grp 8-135

The hold times do not apply since the analyses were being conducted on rock samples for metals that are a part of the naturally occurring minerals in the rock. Please see Response to Comment Grp 8-134.

Potential for loss of mercury under the conditions described could be of concern if the testing was being conducted on materials that may contain elemental mercury. However, the samples were all from drill core in native geologic formations that do not contain mercury mineralization and that

were not a part of any past operations at the Idaho-Maryland Mine. Thus, any mercury that could potentially be present would be trace amounts that might be part of the mineral matrix in the naturally occurring geologic formations. Extended hold times and temperatures above 6 degrees Celsius would not affect the presence of mercury in the samples since the natural rock has been present for millenia and exposed to a wide range of temperature variations over that period.

As noted in Table 4-7 of Appendix K.2 of the DEIR, boron was not detected in any of the samples analyzed, so there is no potential that boron could have leached from glass sample containers.

The notations from ACZ noted in this comment are not relevant to the samples that were actually analyzed. Testing for chloride, nitrate, nitrite, and sulfate were not conducted on the solid rock and tailings samples provided to the laboratory. Instead, the lab was requested to conduct a wet chemistry analysis on the DI-WET leachate after the leaching was completed (see Chain of Custody forms on EMKO Appendices pp 318-319). Testing for wet chemistry parameters such as the anions listed above is not possible on dry rock samples. Thus, the sample did not even exist until it was created by the lab. Holding times and sample temperature have no bearing since the sample was created and subsequently analyzed directly in the lab.

According to California State Certificate of Environmental Laboratory Accreditation Certificate No.: 2935 (https://acz.com/wp-content/uploads/2021/11/California.pdf), ACZ is certified to analyze boron, sulfate, and solids (filterable, non-filterable and settleable) in non-potable water but ran the analyses using methods for hazardous waste instead, which do not include certification for those analytes.

The analyses not offered for certification or are not covered by NELAC certification #ACZ were conducted as part of the acid-base accounting evaluation. ACZ Laboratories holds certification from the State of Nevada for acid-base accounting methods. Nevada is currently the only state agency offering this certification. https://acz.com/index.php/geochemistry/. Please see Response to Comment Grp 7-167.

Response to Comment Grp 8-136

The holding time for coliform bacteria tests is 6 hours, which presents a challenge for typical field sampling programs where the time to collect multiple samples and then deliver the samples to the laboratory often cannot be completed within 6 hours. This occurred with the sampling at the New Brunswick shaft where obtaining a single sample sometimes required more than an hour and the work occurred overnight. The sampling conducted was to assess baseline conditions, however, and has no bearing on the finding of significant impacts from the project related to water quality. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Field measurements of pH are provided in Tables 3-5, 3-8, and 3-10 of Appendix K.2.

Comments on hold time exceedance for samples D-1 and ED-1 for BOD, MBAS, NO_3, and NO_2 are noted and acknowledged. The accuracy of these results do not have any bearing on the finding of significant impacts from the project related to water quality. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

At the time any sampling for NPDES discharge permitting is conducted in accordance with permits required from the Central Valley Regional Water Quality Control Board (see April 4, 2022 comment letter from the Water Board, Agency Letter 5), additional fish bioassay studies may be

necessary. However, the existing fish bioassay results do not have any bearing on the finding of significant impacts from the project related to water quality.

Response to Comment Grp 8-137

The ACZ lab reports are, in fact, provided in their entirety in the appendices to the EMKO report in Appendix K.2 of the DEIR. As noted in the responses above, the holding times and related notations are either not relevant to the analyses conducted or have no bearing on the impact analysis in the DEIR.

Group Letter 9

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March 16, 2022

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Re: Comments on the Draft EIR for the Idaho-Maryland Mine Project

From: David M. Chambers, Ph.D., P. Geop.

Background

David Chambers has 40 years of experience in mineral exploration and development – 15 years of technical and management experience in the mineral exploration industry, and for the past 30+ years he has served as an advisor on the environmental effects of mining projects both nationally and internationally. He has Professional Engineering Degree in physics from the Colorado School of Mines, a Master of Science Degree in geophysics from the University of California at Berkeley, and is a registered professional geophysicist in California (# GP 972). Dr. Chambers received his Ph.D. in environmental planning from Berkeley. His recent research focuses on tailings dam failures, and the intersection of science and technology with public policy and natural resource management.

Grp 9-1

OVERALL COMMENT

This is a rather unusual mine project proposal, a request for an 80-year operating permit, in that most regulatory agencies would consider the level of information presented for this environmental review of the project sufficient only to consider this as a proposal for advanced exploration, not for mine development. This mine development proposal lacks the economic and environmental data necessary to evaluate a full mine development proposal.

Grp 9-2

Unlike a typical mine that is being proposed for production, the Idaho-Maryland mine; (1) does not have an identified mineral reserve, or even a mineral resource; (2) the drilling core is not sufficient to provide the necessary information on the geochemistry of the waste rock and tailings; and, (3) there is no surface water-quality modeling. These are all elements that are critical in evaluating the potential impacts of a proposed mine.

As a result, it is not known whether the mine waste could leach contaminants into ground and/or surface waters. The design details of the "engineered fill" facility have yet to be done, so it not known if the proposed design is geotechnically sound. In addition, the long-term closure costs for the mine have not been analyzed.

Page #2

SECTION-SPECIFIC COMMENTS

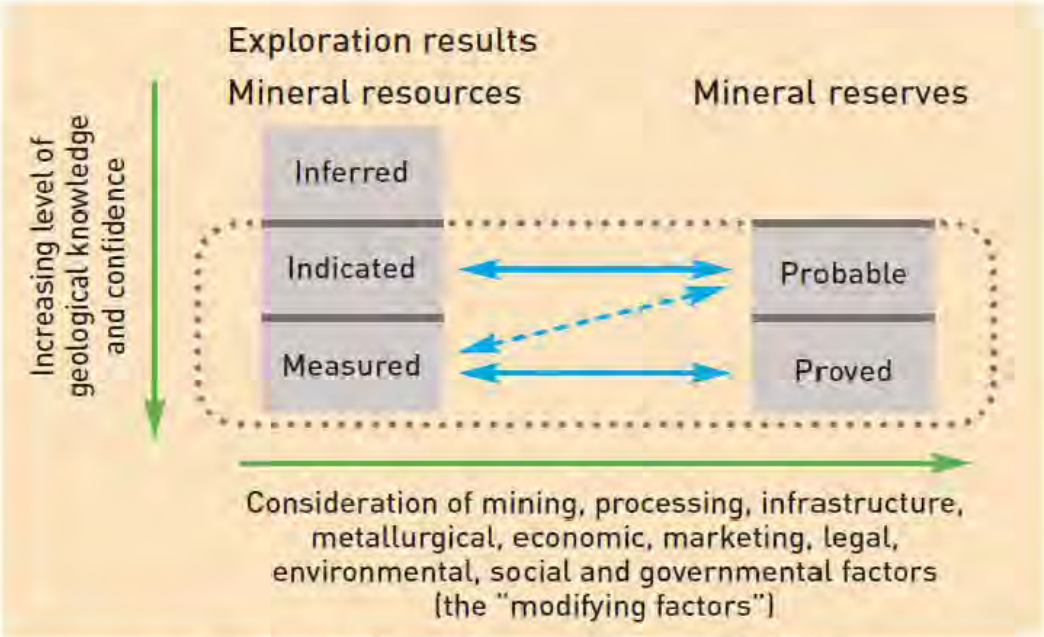
3.6 Project Objectives

In order to have a credible mine proposal, a minimum amount of ore must be identified to warrant the economic investment to open a mine. It is possible that a mining company has enough capital to self-fund the hundreds of millions of dollars necessary to bring a mine property like Idaho-Maryland to the point where it is ready to produce its first ounce of gold, but this is seldom the case. And even if this were the case, a responsible board of directors would require a thorough economic analysis before committing this level of funding for a project.

A mineral property with no current mineral resources or mineral reserves has been described by the Canadian National Instrument 43-101 policy as an "early stage exploration property" (OCS 2011). This is the case with the Idaho-Maryland property's latest 43-101 compliant technical report (Rise Gold 2017).

A mineral resource is a concentration or occurrence of solid material of economic interest. A mineral reserve is the economically mineable part of a measured and/or indicated mineral resource (ICMM 2013). The figure below has presented in approximately this same format for quite some time as a way to illustrate how the concepts of mineral resource and mineral reserve are related – technically, economically, and legally.

Grp 9-3



Classification of Mineral Resources & Reserves (ICMM 2013)

Grp 9-4

Rise Gold does not have enough drill samples to satisfy the requirements to meet any of the mineral resource or reserve definitions described in the Classification of Mineral Resources & Reserves. This same lack of an adequate number of drill samples also results in the lack of data required to adequately characterize the geochemistry of the waste rock and tailings that will be produced, or to supply test data on the leachate from this waste that would allow modeling of potential impacts to surface water.

Page #3

Geochemistry of the waste rock

The projected waste rock geochemistry analysis is summarized in the EIR Appendix K.2: Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project Nevada County, California, EMKO Environmental, February 2021.

In Table 4-5 (below) from Appendix K.2, it is predicted that the 96% of the waste rock will produced will be Meta-Andesite.

Table 4-5 Estimated Daily Barren Rock Production

Material Type	Tons per Day	Percent of Material Produced
Meta-Andesite	481	96
Altered Meta-Andesite	12	2
Diabase	5	1
Serpentinite	2	1
TOTAL	**500**	**100**

Rise completed 19 drill exploration drill core holes, totaling 67,500 linear feet, from 2017-2019. From this drill core, Benchmark Resources collected six drill core samples that it used to characterize the geochemistry of the waste rock. These samples are listed in Table 4-6.

Meta Andesite, which constitutes 96% of the waste rock to be mined, was taken from three intervals of drill core – samples MA-1, MA-2, and MA-3. Sample MA-1 was from the near surface rock 167' - 177' below the drill level, so it not representative of most of the Meta Andesite that will be produced from mining, which will occur at much greater depth. As a result, the geochemical predictions for approximately 96% of the waste rock to be produced comes from one 10-foot interval of drill core (Sample MA-2 from 3959.7 ' to 3969.7'), and one 1-foot sample (MA-3 from 3265' to 3266').

Table 4-6 Core Samples Collected by Benchmark Resources

Sample Name	Description	Date	Time	Bag #	Hole #	Elevation Interval
MA-1	Meta Andesite/Porphyrite	29/10/2019	10:45 AM	Y973551	I-19-13	167'-177'
MS-1	Meta Sediment/Porphyrite	29/10/2019	11:00 AM	Y973560	I-19-13	1,067'-1,077'
MA-2	Meta Andesite/Porphyrite	29/10/2019	11:05 AM	Y973594	I-19-13	3,959.7-3,969.7
MAA-1	Meta Andesite Altered/Porphyrite	29/10/2019	11:20 AM	core box	I-19-13	3,357'-3,360'
S-1	Serpentinite	29/10/2019	11:25 AM	core box	I-18-11	4,725.6'-4,725.7'
MA-3	Meta Andesite Altered/Porphyrite	29/10/2019	11:45 AM	core box	I-18-10	3,265'-3,266'

Another way to describe this is that the geochemical characterization of the 2 million tons of waste rock produced during the first 11-years of mining, and nominally the waste rock production from the entire 80-life of the proposed permit, is represented by these two samples, which come from a total of 11 feet of drill core.

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Australian Guidance on Sample Numbers (adapted from Australian Government Department of Industry, Tourism and Resources, 2007 (GARD Guide Table 4-5)

Mine Phase	Number of Samples	Description
Exploration	(1) Prospect Testing – Include sulphur in list of elements being analyzed for all samples tested; include the full range of pathfinder elements as defined by ore deposit/exploration model; collect and record mineralogical data as per exploration/ore deposit model; where the geology of the deposit is known include static testing of at least 3 to 5 representative samples of each key material type (i.e., lithology, alteration type); analysis of ground water and surface water for acidity and representative pathfinder elements. (2) Resource Definition – All samples tested for sulphur and representative samples tested for mineralogy as per ore deposit model. **Static testing of at least 5 to 10 representative samples of each key material type. *(emphasis added)*** Collect groundwater and surface water data. Surface water and groundwater analysis to include acidity as well representative metal ions. All testing to include QA/QC samples.	By the end of the resource definition phase, there should be adequate information to accurately characterize the ARD potential of the ore body (high and low grade), although further test work will normally be required to characterize the ARD potential of waste rock and ore and hence tailings.
Pre-Feasibility	**Static testing of several hundred representative samples of high and low grade ore, waste rock and tailings**, the number dependent on the complexity of the deposit geology and its host rocks. ***(emphasis added)*** All drillhole samples analyzed must include sulphur analysis and identified representative metal ions. Sampling density is dependent on complexity of ore deposit and host rock geology interval of representative drill holes but should be restricted to single rock units or lithologies - include minimums. **Kinetic testing of at least 1 to 2 representative samples of each material type. *(emphasis added)*** Surface water and groundwater analysis to include acidity as well as pH, EC and representative metal ions, including Al, Fe, Mn. All testing to include QA/QC samples.	Where required, the number of samples must be sufficient to populate a "resource" block model of the ore and host rocks that will be affected by mining with a reliable distribution of NAPP[1] data (e.g., acid producing potential (APP), sulphur and acid neutralizing capacity (ANC) (or NPR data) on ore, waste rock and wall rock.
Mine Planning, Feasibility and Design	Where required, additional static testing as required for block waste resource model refinement – **increase density of NAPP (or NPR) characterization. *(emphasis added)*** Inclusion of confirmatory testing (e.g., NAG testing for comparison to NAPP (i.e. APP, or sulphur, and ANC) for metalliferous deposits; and mineralogy or NPR values). Continuation of kinetic testing. Upgrade drillhole database and waste resource model for new ore positions. All testing to include QA/QC sample(s). Apply QA/QC to all analyses, not only ore. Include wall rock.	Data set must be sufficient to assess ARD potential to support a management plan. If data are insufficient, additional testing will be required.

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The widely accepted source of guidance for determining the number of samples for acid-drainage/metals-leaching prediction is the Global Acid Rock Drainage Guide (GARD 2018), published by the International Network for Acid Prevention. The GARD Guide has adopted the Australian Guidance on Sample Numbers for determining the number of samples needed to determine acid-drainage/metals-leaching potential (GARD Guide Table 4-5).

The number of samples used to predict the leaching potential of the tailings and waste rock for the proposed Idaho-Maryland Project does not meet even the lowest level of these criteria. The number of samples analyzed for this proposal would not even meet the requirements for the Exploration stage of sampling, let alone the Mine Planning, Feasibility and Design phase, which is the level of development being proposed for the Idaho-Maryland Project.

3.7 Project Components– Water Treatment

There is no discussion, or disclosure, of the operational water quality treatment needs or processes. The EIR merely requires that the applicant apply to the Regional water Quality Control Board for a discharge permit. The water quality discharge that will be required by the discharge permit should be disclosed in the EIR so that the public is able to assess and comment on the potential impacts. To simply assert that water quality standards will be met is not sufficient for reviewers to assess either the adequacy of the water treatment methods proposed, or the adequacy of the standards proposed for the discharge permit.

Grp 9-5

This completely circumvents any discussion or analysis of what the contaminants of potential concern might be, what contaminants would be monitored, what treatment methods are available, and where monitoring would take place. This information should all be disclosed in the EIR.

In addition, a Monitoring Plan should be included. The Monitoring Plan should incorporate all elements of monitoring, including surface water, ground water, air, and noise sampling. Sampling locations, frequencies, and constituents should be disclosed/discussed in the Monitoring Plan, and summarized in the EIR.

Grp 9-6

3.7 Project Components – Backfill

It is noted that approximately 500 tons/day of tailings will be backfilled into the mine as cemented paste. The technical details of the process are contained in "Desktop Study of Cemented Paste Backfill, ITASCA Denver, Inc. February 24, 2020." In this report it is noted that no tests on the leaching characteristics of tailings have been performed, but that testing would be done when a cement had been selected. Even though the backfill is unlikely to turn acidic, the potential for neutral leaching of contaminants like arsenic need to be investigated.

Grp 9-7

The answers to several critical questions that should be addressed in Chapter 3 of the EIR are: (1) the grind size of the tailings used for backfill; (2) the type and amount of cement to be used; and, (3) the results of leach tests on the backfill.

This information should have been available for the EIR, and is another data gap in the EIR.

3.7 Project Components – Engineered Fill Transport

Even though this is nominally the section about the transport of the waste material, most of the technical information on the Engineered Fill is presented here.

Grp 9-8

The mine waste that is not backfilled into the mine will consist of 50% tailings (rougher tailings from flotation separation in the mill), and 50% waste rock from the mine. Approximately 4 million tons of waste would be placed at two sites near the mine during the first 11-years of mining. The number of samples utilized in the leach tests of this waste is not sufficient to properly characterize the contaminants

Page #6

that may be leached from the waste. Comparing the number of samples cited in the EIR to the sampling guidelines of the GARD Guide demonstrate the insufficiency of the existing tests.

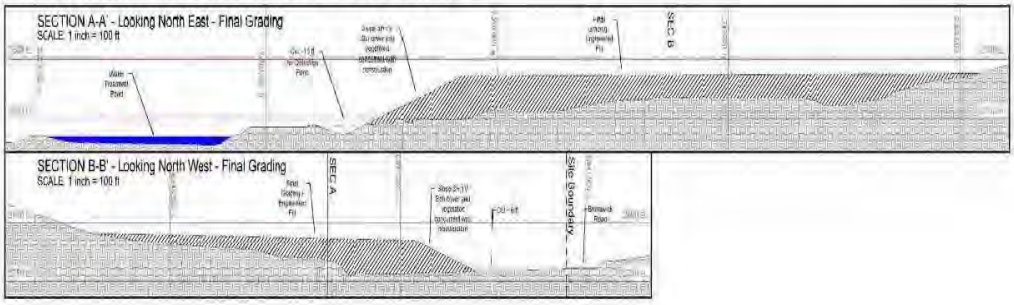
In addition to testing for the contaminants that may come from the waste, as the term "engineered fill" implies, this will be an engineered mine waste facility. The EIR, and its supporting documents, imply that the required engineering analysis will be done at some future time, but provide virtually no engineering analysis or design specifications for these waste facilities as a part of the EIR.

It is stated in the EIR that, "*Engineered fill would continue to be placed, graded, and compacted in a series of lifts …*" The only drawings of the cross sections of the waste facilities in the EIR are from Rise Grass Valley, not an engineering company, and seems to show the mine waste being deposited as end-dump layers that cannot be compacted to generate further stability, not horizontally-deposited layers that could be compacted.

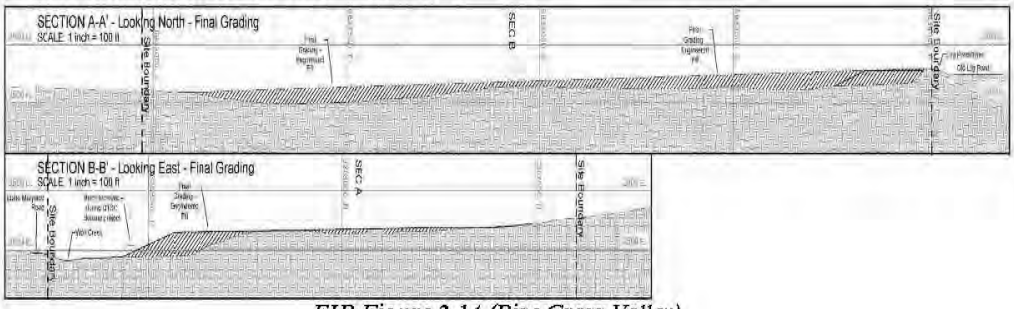
The new mine waste will be placed on top of portions of existing mine waste, which could provide a plane of weakness that could provide an additional failure plane for the significant weight of rock that will placed on top of it. The Brunswick facility is projected to be up to 90 feet in height, and the Centennial facility up to 70 feet high.

Grp 9-9

BRUNSWICK INDUSTRIAL SITE - SECTIONS



CENTENNIAL INDUSTRIAL SITE - SECTIONS



EIR Figure 3-14 (Rise Grass Valley)

Page #7

There is no technical report to provide the detail needed to evaluate the geotechnical viability and safety of these facilities. The potential for this waste to fail under static or seismic loading needs to be professionally evaluated by a qualified engineering contractor. It would be inappropriate to issue a permit for the construction of these waste facilities without proper engineering analyses. To illustrate what could happen, the picture in Photo 1 comes from a waste rock pile at a Nevada mine that failed due to inadequate engineering. While not catastrophic, such failures can cause significant environmental and economic damage.



Photo 1: Waste Rock Dump Failure at the Gold Quarry mine (2005)

The seismic reports discussed in the Geology section of the EIR are not up to date, and even if updated would not meet the requirements for a probabilistic seismic site analysis. Mine waste facilities must be designed to withstand much larger seismic events than required by typical seismic building codes because of the long expected life of the water facilities. According to information provided in the Brunswick and Centennial Industrial Site Geotechnical reports (EIR Appendices H.1 and H.4), a probabilistic and/or deterministic seismic assessment has not been done for the Idaho-Maryland site.

Grp 9-10

In the geotechnical report for the Centennial Industrial Site the mine waste to be used as engineered fill is described as; "*We understand that proposed foundation structures will be constructed on import fill material that will primarily consists of medium dense granular soil composed of silty or clayey sand/gravel, with possible rock fill at depths.*" The term "medium dense granular soil composed of silty or clayey sand/gravel" is not an adequate description of the tailings. Tailings, at a 75 um grind size, the most likely choice for grind size based on the flotation recovery testing done by McClelland Labs, are termed "silt" (see EIR Appendix H.4, Table 5.1-1, Particle Size Gradation, Historical Sand Tailings).

Page #8

Grp 9-11

With an equal ratio of tailings to waste rock in the engineered fill, not only is a careful analysis of the geotechnical properties of the tailings important, and currently lacking, but how these two fill sources are mixed is also critical, since the tailings and waste rock have very different geotechnical properties. These analyses are lacking in the EIR and its supporting technical reports.

Grp 9-12

In the EIR, it is also proposed that an alternative for placing the mine waste in the proposed facilities is selling the waste in the local marketplace as fill material. There are several issues that make this proposal unlikely. First, there is liability associated with mine waste. Even if the waste is purported to be contaminant-free, and this waste is associated with mining sulfide mineralization that can release metal contaminants, it is seldom possible to guarantee that all of the waste will be contaminant-free. According the laboratory analysis for the six waste rock samples analyzed for Acid-Base Accounting, the sulfide sulfur content of the waste rock varies from 0.04 - 1.78 % Sulfide Sulfur (EIR Appendix K.2, EMKO 2021, Table 4-8 Tailings & Barren Rock Samples - ABA Results). There is significant variability in the amount of sulfide sulfur, and significant amount of sulfide sulfur (1.78%), recorded in the very limited number of waste rock samples tested. If any of the waste sold as clean fill should cause a problem, the sellers of that material, and the company that produced that material, would likely be legally liable. Just the possibility of legal entanglement keeps virtually all mining companies from selling its waste rock or tailings, and is very likely to make it very difficult to find an independent distributer that is willing to assume this risk.

Grp 9-13

A second issue is one of logistics. The mine waste is produced at a constant rate – 1,000 tons per day, 365 days/year, for the life of the mine. Markets for fill material are typical episodic. For example, there is much more fill material placed during the summer than during the winter. In order to handle surges in the demand for fill material, temporary storage for a significant amount of material would be required by a vendor of this material. If the mining company is going to provide this service itself, then the storage facility should be evaluated as a part of the mine proposal. If the material is to be sold to an independent user, then the viability of that operation should be demonstrated with at least a contract that someone is willing to accept 1,000 tons/day of mine waste.

3.7 Project Components – Reclamation Plan

Most reclamation plans submitted as a part of a mine proposal are largely conceptual in nature, including the reclamation plan accompanying this EIR. However, for those tasks that can be clearly identified as being necessary for mine closure, these tasks should be described with enough detail that the engineering feasibility and cost can be analyzed.

In order to protect the public from incurring the costs associated with an unplanned mine closure, or bankruptcy, the funds should be available to public agencies that are sufficient for those agencies to take over and complete reclamation of the mine, and to perform any water treatment that may be required.

Grp 9-14

At the Idaho-Maryland Mine, it is known that mine openings must be closed, drains must be prepared to collect the seepage that has been coming from the mine, and that will presumably resume after mine closure, and that the mine waste facilities can be closed and safe configuration. However, there are no reclamation engineering specifications, work plans, or cost estimates made for the EIR.

The potential costs for post-closure water treatment, if required, should also be included. However, there is insufficient information on seepage water quality to conduct this analysis.

Financial Assurances for mine closure runs tens to hundreds of millions of dollars, so ignoring these costs puts taxpayers at significant risk of miscalculation at a later date. Because these sums are so substantial, the public should be informed about these costs, and how the costs were estimated.

This is a significant omission in the EIR.

Page #9

4.8.2 Existing Environmental Setting – Groundwater Occurrence in Mine Workings

Mine Flooding and Worker Safety

In the discussion of the Union Hill Mine, it is noted, "*The Union Hill Mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine.*"

There are two important points to note in this discussion, (1) the Union Hill Mine is very close to the Idaho-Maryland at several levels; and, (2) there has been a possible weak hydraulic connection between the two mines, which is only logical.

Grp 9-15

The EIR notes that the Union Hills Mine will not be dewatered. The EIR suggests there is no significant hydraulic connection between the mines, but the discussion from the EIR quoted above suggests there could be some connection, and what is not known is whether this hydraulic connectivity could increase in the future.

There is no discussion in the EIR of the potential impacts for the Idaho-Maryland Mine if flooding were to occur during mining. From ITASCA Figure 2-3 (attached as the last page of this document), it can be seen there are extensive abandoned mine working above and adjacent to the Idaho-Maryland mine that will remain flooded after the Idaho-Maryland is dewatered.

If a conduit between these two mine were to open, for instance due to the widening of a fracture related to blasting vibrations or a seismic event, the flood of water into the Idaho-Maryland could be rapid and catastrophic for anyone working in the mine.

This issue must be thoroughly addressed before anyone is permitted to enter the dewatered mine.

4.8.4 Impacts and Mitigation Measures – Water Within Underground Mine Workings

Geochemistry of the tailings

Even though this is nominally the section about the underground mine water, most of the technical information on the geochemistry of the tailings samples is presented here.

Approximately 50% of the mine waste, also referred to as "engineered fill", disposed on the surface will be tailings. The geochemistry of these tailings is important because meteoric waters will infiltrate through the waste, and any leachate products will end up in groundwater, and potentially surface water.

Grp 9-16

Tailings produced in the milling process are generally homogeneous because the physical and chemical processing of the ore remains relatively constant, and the ore is typically blended to maintain a consistent ore grade to facilitate gold recovery. Because of this, fewer tailings samples than waste rock samples are required for leach testing, but those testing samples must be representative of the tailings that will be produced during mine operation.

While Appendix K.2 states that the tailings samples were generated from a "46 kg metallurgical sample". The ore sample used to create the four tailings samples contained 1.6% Sulfur (EIR 2021, p. 4.8-46). The four tailings samples had a sulfur content of 0.06 – 0.12% Sulfur (EIR 2021, p. 4.8-46), with Net Neutralization Potential greater than 100 for all samples (EIR Appendix K.2, EMKO 2021, Table 4-8 Tailings & Barren Rock Samples - ABA Results).

The drill hole intervals this material came from is not stated in the EIR, nor is the time when the metallurgical sample was generated. Again, if an NI 43-101 compliant report that reported a mineral

Page #10

resource and/or reserve were available, this basic information would have required and would have been available for the EIR.

In Appendix K.2, EMKO notes that the four samples are of different grind sizes. The size of the tailings particles could have an effect on the rate of leaching. Smaller grain size leads to more rapid leaching of contaminants. Based on the results of the metallurgical testing, a final grind size is generally selected before geochemical testing is done, but a final grind size has not been selected for this project. The different grind sizes of the tailings could have an unquantified effect on the leach testing of the tailings samples.

Grp 9-17

Because the size specification has geotechnical and geochemical implications for both the tailings disposed on the surface, and cemented backfill in the mine, the size specification needs to be disclosed in the EIR. The limited test results available from preliminary tailings tests are not sufficient to make long-term predictions for the geotechnical stability or water quality implications of the tailings.

The method selected for leach testing the tailings and waste rock used distilled water, which is the least aggressive of the leach testing methods. For mining waste, waste rock and tailings, short-term tests typically use a weak acid solution for leach testing in order to simulate the generation of some acid in the waste due to sulfide decomposition. Long-term leach testing, which runs for months rather than hours or days, typically uses distilled water, because natural sulfide decomposition and the accumulation of oxidation products has sufficient time to stabilize.

From Table 4-7 Tailings & Barren Rock Samples - Total Metals and DI-WET Results

Constituent	Test Type	Units	Tailings Samples				Rock Samples					
			F-1	F-2	F-3	F-4	MA-1	MA-2	MA-3	MAA-1	MS-1	S-1
METALS												
Aluminum	Total	mg/Kg	16100	16300	16300	16300	23000	24400	31100	421	22900	41300
	DI-WET	mg/L	0.17	0.18	0.26	0.28	0.94	1.08	0.6	0.49	0.99	0.32
Antimony	Total	mg/Kg	0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	1.1	<0.2	0.6
	DI-WET	mg/L	0.0018	0.0015	0.0031	0.0020	0.0006	0.0041	0.0016	0.0104	0.0021	0.1050
Arsenic	Total	mg/Kg	1.7	1.4	2.000	1.2	0.2	6.1	0.5	34.8	0.7	36.8
	DI-WET	mg/L	0.0018	0.0013	0.0019	0.0014	<0.0002	0.0051	0.0014	0.0148	0.0005	0.1690
Copper	Total	mg/Kg	86	86	87	84	141	43	87	27	89	30
	DI-WET	mg/L	<0.01	0.01	0.02	0.09	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Iron	Total	mg/Kg	35500	36000	35200	35200	45600	42100	54900	15500	33700	36800
	DI-WET	mg/L	<0.03	<0.03	<0.03	<0.03	0.05	0.08	0.20	<0.03	<0.03	0.33
Manganese	Total	mg/Kg	1000	1010	990	994	604	747	1230	311	696	176
	DI-WET	mg/L	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
GENERAL CHEMISTRY PARAMETERS												
Nitrate	DI-WET	mg/L	0.06	0.08	0.28	0.24	<0.02	<0.02	0.05	<0.02	<0.02	<0.02
Sulphate	DI-WET	mg/L	8.40	6.30	8.50	8.70	3.3	1.4	6.60	1.9	1.1	2.8

Grp 9-18

In reviewing the leach test results from Appendix K.2, Table 4-7: Tailings & Barren Rock Samples - Total Metals and DI-WET Results, the following observations are noted:

- Aluminum levels in the leachate are high. Even though the measurement was probably done as Total aluminum, these levels suggest that aluminum leaching could be an issue, and that Dissolved aluminum should be monitored.

- There is antimony present, and the water quality standard for antimony is low. Waste rock sample S-1 shows a level of antimony that is well above the water quality standard. Even though there is only a relatively small amount of S-1 rock in the waste, antimony should be monitored.

Grp 9-19

- Arsenic is measured at about 20% of the water quality standard, and is known to be an issue with the existing mine waste. Arsenic could become an issue if localized acidic conditions, or longer exposure time, drive the oxidation reactions.

Grp 9-20

Page #11

Grp 9-21
- Copper being detected at levels that could exceed water quality standards, but the measurement level for the sampling was too high, so we don't know enough about what is going on with copper.

Grp 9-22
- Iron and Manganese are both know to be present in existing mine water and the mine waste at levels that exceed water quality standards, but they are not showing elevated levels in the test data. This strongly suggests that the oxidation taking place in the mine itself, and in the mine waste on the surface, is more aggressive than that being simulated in the leach tests using distilled water.

Grp 9-23
- Nitrate, a residual from blasting, will almost certainly be present at levels significantly higher than projected in these tests.

Grp 9-24
- Similarly, sulfate will be higher than projected once the waste has time to oxidize.

Grp 9-25
- An important constituent, sulfide-sulfur, is not reported on a per-sample basis

Grp 9-26
In the summary of the report (Appendix K.2), EMKO notes that Potential Contaminants of Concern include ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1,2-DCE. To this list, I recommend adding antimony, copper, and nitrate.

Grp 9-27
Leach tests for the paste backfill also need to be completed. It is not appropriate to grant a mining permit that allows the use of this backfill without evaluating the potential long-term effects on water quality.

6.3 Selection of Alternatives – Alternatives Considered in this EIR

The mining project as proposed in this EIR has a fundamental lack of information on the economic viability of the mine, and potential environmental impacts related to geochemistry and water quality.

Grp 9-28
The data submitted in support of this EIR is only sufficient to support an application for dewatering the mine, and for underground exploration drilling. This would provide not only the information that will be required to perform a preliminary economic analysis of the orebody, but would also supply the samples needed for geotechnical and geochemical testing, and for water quality modeling.

The EIR should analyze an Alternative that provides for dewatering and underground exploration. That is the only Alternative that the information provided in this EIR will support.

Thank you for the opportunity to comment on this Draft EIR.

Sincerely;

David M. Chambers, Ph.D., P.Geop.

Page #12

References:

EIR 2021. Idaho-Maryland Mine Project Draft Environmental Impact Report, Raney Planning & Management, December 2021

EMKO 2021. Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project Nevada County, California, EMKO Environmental, February 2021

GARD 2018. Global Acid Rock Drainage (GARD) Guide, published by the International Network for Acid Prevention, Chapter 4.0 Defining the Problem – Characterization, (http://www.gardguide.com/index.php/Chapter_4)

ICMM 2013. Responsible reporting of mineral assets, International Council on Mining & Metals, Committee for Mineral Reserves International Reporting Standards, April 2013

ITASCA 2020. Desktop Study of Cemented Paste Backfill, ITASCA Denver, Inc. February 24, 2020

OCS 2011. NI 43-101 Standards of Disclosure for Mineral Projects, Form 43-101F1 Technical Report and Related Consequential Amendments, Chapter 5, Rules and Policies, Ontario Securities Commission, 34 OSCB, June 24, 2011, https://www.osc.ca/en/securities-law/instruments-rules-policies/4/43-101

Rise Gold 2017. Technical Report on the Idaho-Maryland Project, Grass Valley California, USA, prepared for Rise Gold Corp, Amec Foster Wheeler Americas Limited, June 1, 2017

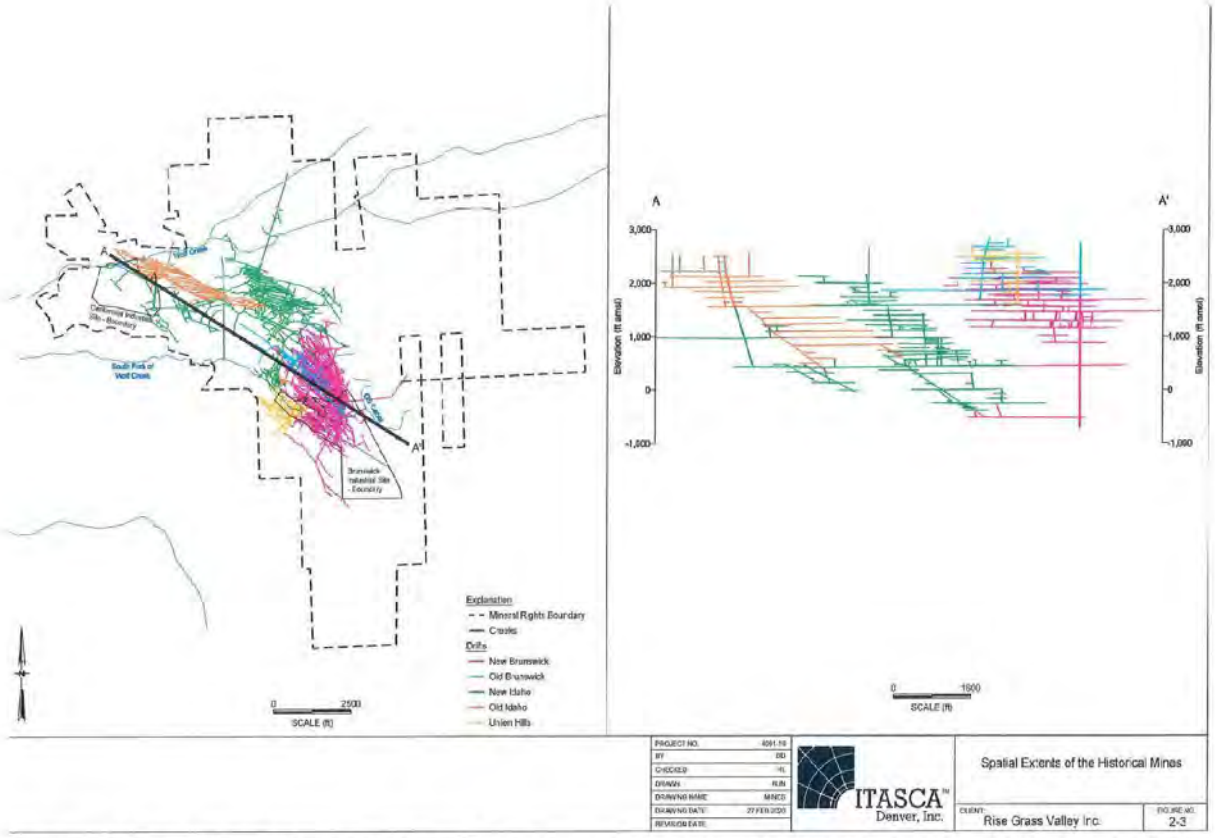


Figure 2-3, from Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine, ITASCA, November 2020

GROUP LETTER 9: DAVID CHAMBERS, CENTER FOR SCIENCE IN PUBLIC PARTICIPATION

Response to Comment Grp 9-1

This letter is a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-173 through Grp 7-200.

Group Letter 10

First Church of Christ Scientist, Grass Valley
375 Crown Point Circle
Grass Valley, Calif. 95945
March 15, 2022

Matt Kelley, Sr. Planner
Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, California

Dear Mr. Kelley:

Grp 10-1 In response to your outreach for public comments on the Draft EIR for the Idaho-Maryland Mine Project, the First Church of Christ Scientist, Grass Valley submits the following:

Grp 10-2 Our primary concern with the project is the traffic and noise pollution that will occur from the project. Based on Figure 3-2 of the Draft EIR, our church is located approximately 800 feet from the Centennial Industrial Site, and also approximately 800 feet from the proposed haul route between the Brunswick Industrial Site, and the Centennial Industrial Site. According to your draft EIR, both of these sites will generate significant noise pollution. The EIR indicates the project will generate between 200 and 400 truck trips per day hauling industrial waste for compaction at the Centennial Industrial Site. If a heavy diesel truck hauling industrial waste generates about 110 decibels of noise at the haul point source, this would result in about 40-50 decibels of noise at our church which is about 800 feet away. If we keep our doors and windows shut, this would still create a noise disturbance at our church. We realize that a lot of inner city churches deal with a greater ambient noise level than this, but it will still significantly detract from the current peace and tranquility that we enjoy during our services.

Grp 10-3 One easy mitigation would be if the trucks did not operate during our services, which is between 10 and 11 am on Sundays, and between 7:30 and 8:30 pm on Wednesdays.

Grp 10-4 It is more difficult to determine the noise level created by the compaction activity on the Centennial Industry Site, as the EIR is negligent in assessing this issue. We would imagine the noise level would be similar to that of the truck hauling, so our concern would be the same.

Grp 10-5 Respectfully submitted,
Executive Board, First Church of Christ Scientist, Grass Valley

GROUP LETTER 10: FRED BELL, FIRST CHURCH OF CHRIST SCIENTIST, GRASS VALLEY

Response to Comment Grp 10-1

This comment is introductory. No response is required. Please see the below response to specific comments.

Response to Comment Grp 10-2

The comment states that commenter's primary concerns are traffic and noise. The scale on DEIR Figure 3-2 is incorrectly labeled. As a result, the distances cited in this comment which were based on that scale are similarly incorrect. The 1,600-foot reference on the scale should read 4,000 feet and is hereby corrected at the end of this letter. Using the correct scale, the actual distance from the Church of Christ Scientist, located at 375 Crown Circle in Grass Valley, was determined to be in excess of 3,000 feet to the Centennial Site and Brunswick Sites, and approximately 450 feet to the centerline of the nearest point of Whispering Pines Lane and Brunswick Road. Given the substantial distances from this receptor from the project noise sources, and the similarity of this receptor to Receptor #5, this location was not specifically evaluated in the noise study prepared for the DEIR. However, because the ambient noise exposure at this receptor is expected to be similar to that of Receptor #5 due to the similar distance to Brunswick Road, the baseline daytime, evening and nighttime average ambient noise environment at this receptor are approximately 50 dBA L_{eq}.

In response to this comment, the SoundPlan model was used to specifically model project noise exposure at this receptor. The results of that analysis indicate that average noise levels from the project, including all operations occurring on both the Brunswick and Centennial sites simultaneously, is predicted to be 19 dBA during daytime and evening hours, and 15 dBA during nighttime hours. The predicted noise level for receptor #5 is 29 dBA during daytime and 13 dBA during nighttime hours (see Tables 21 and 22 in Appendix L). These levels are well below both baseline ambient conditions and well below the noise standards applicable at the church use. As a result, the commenter's church would not be adversely affected by noise from the project.

DEIR Table 4.10-15 indicates that the project would result in a 2.6 dB increase in traffic noise levels on Whispering Pines Lane and a 0.3 dB increase in traffic noise levels on Brunswick Road. Neither of these increases exceed the project's standards of significance. In addition, because baseline ambient conditions at the church site are influenced more by traffic on Brunswick Road than by traffic on Whispering Pines Lane, the total change in traffic noise levels at the Church resulting from the project is predicted to be approximately 0.4 dB. As the project-related traffic noise level increase would be well below the criteria for a finding of a substantial traffic noise increase at the Church, no adverse noise impacts are identified for this receptor. The commenter's statement that heavy trucks generate 110 decibels of noise is unable to be verified without a distance being provided, but overall ambient traffic noise levels at this location are predicted to be approximately 58 dBA L_{dn} at the exterior of the church. Because heavy trucks currently utilize Brunswick Road extensively, noise generated by the approximately 6 additional heavy truck trips generated by the project each hour would not be significant at this receptor, with combined baseline plus project noise at approximately 58.4 dBA L_{dn}. An exterior noise level of 58.4 dBA L_{dn} would likely result in an interior noise level of 43.4 dBA L_{dn} with windows open and 33.4 dBA L_{dn} with windows closed. Interior noise levels of 45 dBA or less are typically considered acceptable for residential uses where sleep is critical. Therefore, these noise levels would not be expected to be destructive to typical worship activities.

Maximum noise levels generated during passbys of the project's heavy trucks would be similar to maximum noise generated currently by non-project heavy trucks which already operate daily on Brunswick Road. As a result, no increases in maximum noise levels would result from the project's heavy truck traffic at this receptor.

Response to Comment Grp 10-3

CEQA requires potentially significant impacts be identified and mitigation applied in cases where the noise impacts of a project are predicted to be significant by exceeding identified thresholds of significance. After making corrections to the DEIR Figure 3-2 (see below), it can be seen that the project will not have any significant noise impacts at the church, and noise mitigation is therefore not required.

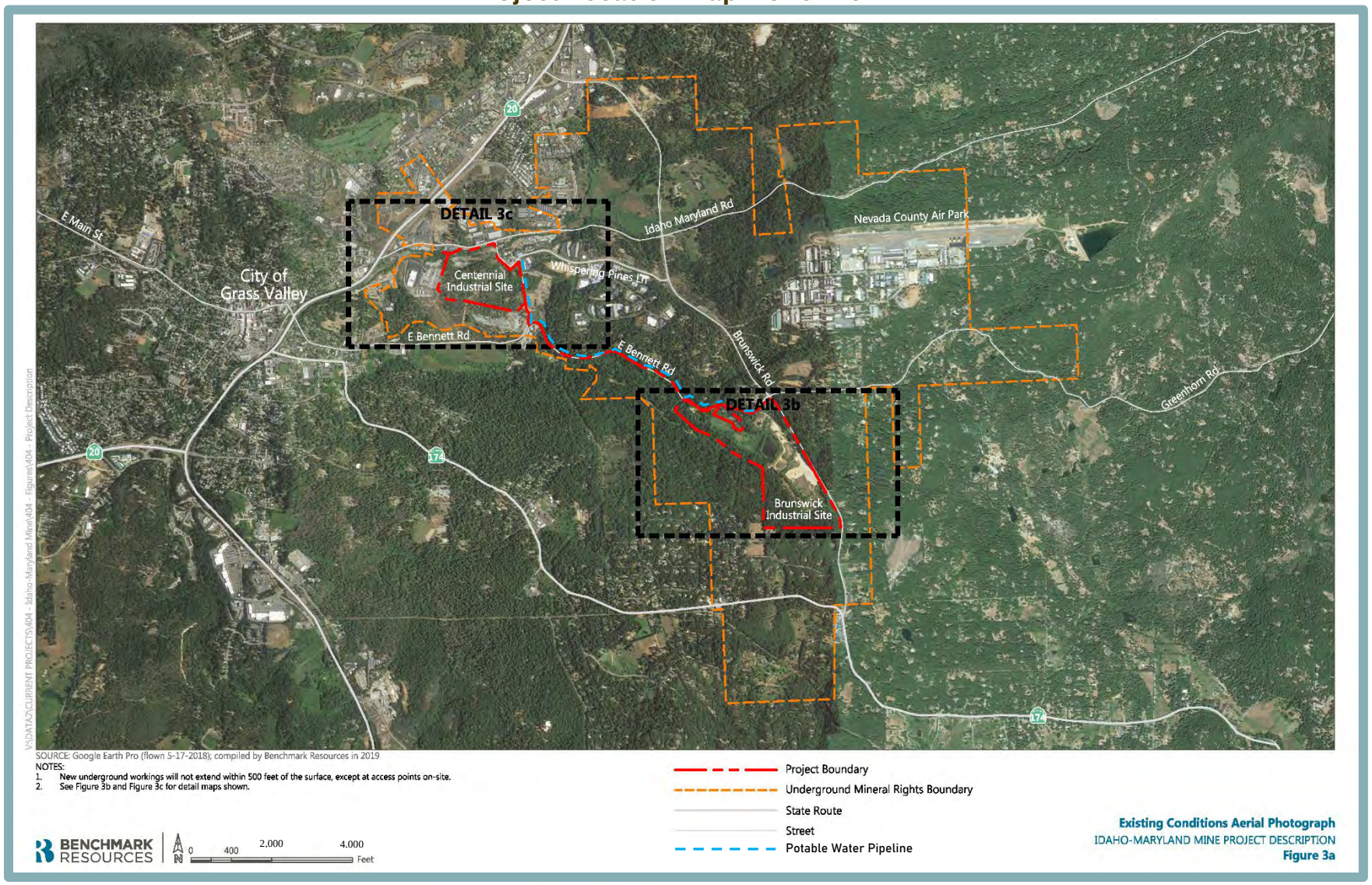
Response to Comment Grp 10-4

Commenter is concerned with the noise level of compaction activity on the Centennial Site. The noise analysis prepared for the DEIR specifically evaluated the noise generation of heavy earth-moving equipment used for engineered fill operations at the Centennial Site (see DEIR Impact 4.10-2 on DEIR pages 4.10-31 and 4.10-32). The predicted noise level at the Church of Christ Scientist on Crown Circle associated with engineered fill operations at the Centennial Site is 15 dBA, which would be imperceptible at this receptor location.

Response to Comment Grp 10-5

This comment is the signature line for the comment letter. No response is required.

Figure 3-2
Project Location Map - Overview



Group Letter 11

Friends of Banner Mountain (FBM) Est. 1984

FIREWISE USA
Residents reducing wildfire risks

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FBM is a non-profit 501(c)(3) organization with an all-volunteer Board.



Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Re: Comment Deadline Extension for Idaho-Maryland Mine Project DEIR

Dear Mr. Kelley

Grp 11-1

The Friends of Banner Mountain is currently reviewing the Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR) and will be submitting a comment letter on the document. Given the length and complexity of the DEIR we respectfully request an extension of at least 30 days beyond the March 4, 2022 comment deadline.

We appreciate the County's well-organized web page that provides the DEIR and all supporting technical appendices, and look forward to reviewing these documents and working with you as this project makes its way through the environmental review process.

Sincerely,

Edward Sylvester, President
Friends of Banner Mountain

Cc: Heidi Hall, Supervisor , District 1

"Celebrating 37 Years as The Voice of Banner Mountain"
http://www.bannermountain.org

GROUP LETTER 11: EDWARD SYLVESTER, FRIENDS OF BANNER MOUNTAIN

Response to Comment Grp 11-1

The commenter requests an extension of the DEIR public review period. CEQA requires a minimum 45-day public review period for DEIRs submitted to the State Clearinghouse (PRC 21091). The County elected to provide an extended DEIR review period of 91 days from January 4, 2022, to April 4, 2022.

Group Letter 12

Friends of Banner Mountain (FBM) Est. 1984

FIREWISE USA
Residents reducing wildfire risks

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FBM is a non-profit 501(c)(3) organization with an all-volunteer Board.

Grp 12-1

April 3, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Re: Idaho-Maryland Mine Project Draft Environmental Impact Report

Dear Mr. Kelley

The Friends of Banner Mountain (FBM) is a 501(c)(3) organization whose mission is to protect Banner Mountain and its natural and cultural resources for the benefit of residents, visitors, and future generations. We have reviewed the Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR) and provide our comments in the attached document.

For reasons described in the attached comments we believe that the DEIR does not provide an adequate assessment of the potential impacts of this project and does not provide sufficient evidence and analysis for the Nevada County Board of Supervisors to make an informed decision about the EIR and the proposed project.

FBM conducted a poll to assess support or opposition to the proposed project among our members; five respondents supported the project and 133 opposed it. Many of those respondents brought up the issues that we describe in the attached comments.

We believe that construction and operation of the mine will adversely affect the quality of life for residents of Banner Mountain for generations and we are hopeful that the Nevada County Board of Supervisors will not approve this project.

Thank you for this opportunity to share our concerns and comments about this project.

Sincerely,

Edward Sylvester, President
Friends of Banner Mountain

1

GENERAL COMMENTS

1. Mitigation Monitoring and Reporting Program and Maintaining Public Access to Monitoring Reports and Permit Applications

Mitigation monitoring and reporting is a required element for many of the impacts described in the DEIR; the various management plans cited in the DEIR also describe numerous monitoring and reporting requirements. As discussed on DEIR Page 2-4 these monitoring and reporting requirements will be summarized in the Mitigation Monitoring and Reporting Program (MMRP). The reporting requirements among the many mitigation measures and management plans described in the DEIR are diverse and we are hopeful that there will be clarity in the MMRP as to where and when these monitoring reports will be submitted.

We appreciate the way that Nevada County has provided a well-organized website at www.mynevadacounty.com during the DEIR process so that the public has easy access to review the DEIR and supporting technical studies. We request that Nevada County continue to maintain a project website to provide transparency and document accessibility for the public for the duration of construction and the 80-year permit term. The content of the monitoring reports is very germane to determining whether the proposed mitigation is working; therefore, Friends of Banner Mountain (FBM) and many residents of Nevada County would like to have easy access to those monitoring reports and permit applications without having to resort to Public Record Act (PRA) requests.

Grp 12-2

FBM is also concerned that Nevada County may not have adequate staffing and resources to track, review and respond to the many monitoring reports and permit applications that will be submitted. Because the information in these monitoring reports may trigger remedial action, it is important that the County have sufficient funding to support dedicated staff who will promptly enforce and oversee implementation of those remedies. It is not sufficient to rely on review and oversight by agency staff who will be reviewing permit compliance (e.g., Regional Water Quality Control Board, California Department of Fish and Wildlife). Agency staff are busy and under no obligation to provide monitoring reports to private citizens without a PRA request. We believe it is the County's duty to provide the public with easy access to these reports during construction and for the life of the project.

To address the concerns described above we have the following requests:

a. Please develop a MMRP that includes information about:
   - The entity receiving the monitoring report or permit application (e.g., Nevada County Planning, Building or Environmental Health Department, or permitting agencies like Regional Water Quality Control Board)
   - The interval or triggering event for the submittal (e.g., quarterly, annually, or proposed mine activities such as preparing a Risk Assessment before storing explosives underground), and
   - Whether remedial action would be required if performance standards described in mitigation measures, management or monitoring plans are not met.

b. Please provide a discussion in the FEIR addressing:
   - The County's proposed plan for providing public access to monitoring reports, permit applications and any technical studies that are produced during construction and operation for the duration of the 80-year permit.
   - The County's proposed plan to provide sufficient funding to support the County's sustained oversight and monitoring during construction and 80 years of operation.

Grp 12-3

2. Security/Bonds

As described on DEIR Page 4.6-24, the Surface Mining and Reclamation Act requires preparation and implementation of a Reclamation Plan and security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the Count to fund implementation of that plan. That is the only security mentioned in the DEIR; there is no discussion of insurance or security to ensure that the many DEIR mitigation, closing, and reclamation commitments will be fulfilled in the event of the applicant's financial collapse.

A review of Rise Gold Corp's July 31, 2021 Form 10-K and 10Q annual and quarterly reports with the U.S. Security and Exchange Commission (https://www.risegoldcorp.com/financial-statements) is not reassuring and indicates that the proposed mining operation is economically marginal and the anticipated gold revenue is speculative. If the applicant files for bankruptcy after impacts have already occurred, but before the mitigation is implemented, there will be no funds to provide remedial action and mitigation.

Grp 12-4

We understand that the County has engaged the services of a consultant to provide an independent economic analysis of the economic impacts of the mine, which we appreciate. That analysis will likely show substantial declines in property values, which is one of many concerns expressed by FBM members. However, we understand the scope of work does not include addressing the impacts of the project if mitigation cannot be implemented in the event of the applicant's financial failure and bankruptcy. The conclusions of a "less than significant" impact on many resources is based on implementation of the DEIR mitigation measures, but if there is no funding available to implement monitoring and remediation measures those less than significant conclusions would not apply. To address our concern's regarding the financial solvency of the applicant and potential failure to implement monitoring and mitigation please:

a. Provide a discussion in the FEIR describing the proposed source of funding for implementing mitigation measures and remedial actions in the event of the applicant's financial failure and withdrawal from the project after impacts have already occurred. Ideally this would be in the form of security from the applicant, similar to what is described on DEIR Page 4.6-24, but also addressing the restoration and mitigation actions in addition to the required Reclamation Plan.

3. Project Schedule/Sequencing

Construction time estimates are an important element for assessing project impacts on traffic, air quality, noise, and other topics but the estimates are not consistent throughout the various technical section of the DEIR. The DEIR states in some places that the project is estimated to have a twelve-month construction phase, but also states that the construction of the water treatment facility alone would take eighteen months. Significant grading and underground development would be needed before initiating the eighteen-month construction of the water treatment facility, and that facility would need to be completed and fully operational before dewatering (a six-month process) of the mine could begin. After dewatering is complete, the new shaft for ventilation and emergency access would need be constructed to the 1000' depth by working upwards from below. Then, before beginning any actual new mining, the tunnels would need to be restored sufficiently to allow for construction of the underground rock crushing facility. All of these activities would need to happen sequentially rather than concurrently. The eighteen-month estimate of construction seems far too short a

Grp 12-5

period of time to accommodate the sequential construction process. The estimate of construction duration needs to be consistent and as accurate as possible throughout the EIR sections to provide an adequate assessment of impacts. In addition, the schedule needs to reflect the time required to secure the many required permits described in the DEIR. To address this issue, please provide the following in the FEIR:

a. A revised project description (that will carry through in all EIR sections) that offers an accurate and consistent representation of all project components, including expected duration and sequence of each component, and incorporating the time required to secure the many permits identified in the DEIR.

SPECIFIC COMMENTS ON DEIR IMPACT ANALYSIS AND MITIGATION

4. Hydrology and Water Quality/Water Supply/Well Impacts

One of FBM's chief concerns about the project is that it could adversely affect local groundwater resources and wells for many of our members by dewatering the mine and lowering groundwater levels. The project area for the groundwater and well impact analysis should have encompassed the entire 2585-acre area under Banner Mountain where the applicant's mineral rights extend and where underground mining will occur rather than just the approximately thirty wells on East Bennett Drive.

Grp 12-6 The groundwater model that predicted impacts of the proposed long-term and sustained dewatering effort was calibrated based on pumping rates from the historical Idaho Brunswick Mine and only one 1956 water level measurement was collected from the flooded and inactive Union Hill shaft. We believe that using only one water level measurement from 64 years ago to calibrate the analysis for a complex bedrock aquifer system over a large region introduces a significant amount of uncertainty to the model, thereby making the model results inaccurate.

Grp 12-7 Data for the wells analysis came from private wells within a limited area and the data are old and cover just a few years. No usage data is provided, and critical data such as reduction in groundwater recharge from precipitation fails to include the 75 acres of low-permeable mine waste on the two sites. The groundwater model does not include the new access shaft, which would create a local area of groundwater drawdown and based on our review it looks like other existing mine features within a few hundred feet of the surface were also not evaluated in the ground water model. These mine features would contribute to the downward transmission of ground water from the near surface fractured rock areas. In addition, the groundwater model report assumes the geology in the area to be mined is homogeneous. Modeling that relies upon uniform rock, which is consistent from place to place, behaves in a more predictable fashion than rock that in bedrock systems having multiple faults and irregularities.

Grp 12-8 The mine water drains from several locations along Wolf Creek near Centennial Drive, and the DEIR provides only rough approximations of the mine water outflow rates from these areas. Furthermore, these outflow data are contradicted by more reliable records from previous studies which indicate ten times more outflow. Mine water inflow analysis is based on sparse mine water level data from the New Brunswick shaft and only 12 water level measurements were taken between 2003-2007, and three measurements in 2018-19. Please note that these measurements could be incorrectly interpreted; the water level reaches a limit when it exceeds the level of the drains from which the mine water flows and doesn't reflect would could be substantial inflow. Without a measurement of the outflow, the amount of inflow cannot be determined by the water level in the New Brunswick shaft.

Grp 12-9

The DEIR inappropriately defers to the future the collection of additional data via a Groundwater Monitoring Plan. The DEIR acknowledges that more groundwater level data is needed to assess the potential impacts of the proposed project on groundwater levels. Mitigation Measure 4.8-2(a)(4) (DEIR Page 4.8-67) states that this needed water assessment be conducted "once dewatering of the underground mine workings commences." However, once dewatering begins, it will be impossible to measure baseline levels which makes this mitigation measures ineffective.

Grp 12-10

The DEIR relies on fifteen monitoring wells to estimate impacts on water supply wells but does not explain how it arrived at this number of wells or their location, nor is an explanation provided as to why fifteen monitoring wells would be sufficient to estimate the impacts on all water supply wells around the mine area. In complex fractured bedrock spread out over thousands of acres, monitoring water levels at fifteen locations could not provide the needed data to ensure that groundwater impacts to hundreds of existing water supply wells in the project vicinity are identified and mitigated. Groundwater monitoring networks should be established in advance of the project, and the resulting monitoring information should be included in the FEIR.

Grp 12-11

Our members are very concerned about water supply and competition for groundwater for future residential wells in light of the impacts of the project and also from the effects of climate change. According to DEIR Page 4.11-51, water demand within the Nevada Irrigation District's (NID's) service area is expected to exceed supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period. The surface water supply to NID will be subject to reductions during single and multiple dry years. The DEIR concludes that any water supply deficit can be addressed through NID's Water Shortage Contingency Plan, but this NID mitigation may not be possible if NID must limit its own allocations due to drought and climate change.

Grp 12-12

Based on our review of the DEIR and supporting technical studies, we believe that the DEIR does not provide adequate information about existing and future conditions of groundwater, water supply, and wells, and does not accurately assess potential impacts of the project on these resources. To remedy these deficiencies please provide:

a. An updated and revised groundwater model to more accurately predict the extent of the well drawdown caused by the predicted 80 years of mine-dewatering and dewatered maintenance.
b. A more accurate and comprehensive analysis in the FEIR that addresses the issues discussed above. The revised analysis needs to better reflect current and future site conditions and incorporate impacts of climate change to determine the extent and the severity of potential impacts upon groundwater resources, water supply and wells within the larger 2585-acre area under Banner Mountain.
c. A revised and more comprehensive Well Monitoring Plan.

Grp 12-13

The DEIR does not adequately characterize the current mine water chemistry. The Hydrology Report (DEIR Appendix K.2, Table 4-10, page 120) uses discharge screening limits and data from the New Brunswick shaft to define water treatment criteria. However, a more accurate sampling of mine water would be from the drains located along Wolf Creek rather than from the New Brunswick shaft, as described in the analysis of mine water flow (see DEIR Figure 4.8-7). This figure shows water entering the New Brunswick shaft then flowing downward through the existing mineworks to exit the drains at Wolf Creek (e.g., Eureka drain, East Eureka drain). Only a few samples taken from the drains were reported, but these samples are much more representative of the mine water chemistry and indicate higher levels of iron, manganese, arsenic, aluminum, and zinc than the New Brunswick shaft samples (DEIR K.2 Tables 3-6). We believe that regular testing over time at the mine drains



would provide a more accurate assessment of the contaminants flowing out of the mine under varying conditions, regular testing must be conducted over time at the Mine drains. To address this concern, we request that:

d. Provide the results of water quality sampling at the drains located along Wolf Creek rather than the New Brunswick shaft to better define water treatment criteria and provide a revised assessment of potential impacts based on this new sampling data.

5. Hazards and Hazardous Materials

Chapter 4.7 (*Hazards and Hazardous Materials)* and Chapter 4.13 (*Wildfire)* concludes that the project would not impair implementation of emergency response plans, and that project impacts would be below the threshold of significance for Hazards and Hazardous Wastes (*"Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan"*). The paragraph below from DEIR Page 4.7-38 (with identical text on Page 4.13-17) is the only analysis in the DEIR about how 118 haul truck round trips between 6:00 a.m. to 10 p.m., seven days a week to State Route (SR) 20/49 via Brunswick Road, would affect emergency evacuation routes.

> *"In the event of an evacuation order in the vicinity of the proposed mine, such as an evacuation of residents off of Greenhorn Road, the incident command center would contact dispatch and direct them to contact the mine and request the mine operator to shut down the mine and cease all truck hauling operations.[20] While Brunswick Road is not a primary evacuation route, it would be the evacuation route used by residents of the Greenhorn Road area to evacuate to the primary evacuation route of SR 49/20. Ceasing haul truck operations during the emergency evacuation order would ensure that the proposed project would not have the potential to physically interfere with an emergency evacuation plan. Operation of the approximately 7.4 haul trucks per hour attributable to the proposed project could either be temporarily ceased and/or these trucks could pull off the road to enable residents to evacuate as quickly and expeditiously as possible. With the temporary cessation of mine operations, if directed by County dispatch, no further haul trucks would be entering Brunswick Road during an evacuation order. Accordingly, County OES has stated that the proposed project would not have a significant impact related to physically interfering with an adopted emergency evacuation plan."*

Grp 12-14

This conclusion is based on one conversation between Lieutenant Robert Jakobs, Emergency Operations Coordinator, Office of Emergency Services, Nevada County Sheriff's Office, and Nick Pappani, Vice President, Raney Planning & Management, Inc., on January 5, 2021. The DEIR provides nothing more that this brief narrative on the course of action to be taken in the event of an evacuation off of Greenhorn Road, and relies on the opinion of Mr. Jakobs at County OES. However, no details other than the date are provided about the conversation between Mr. Jackobs and Mr. Pappani, nor can the reader determine what information was provided to Mr. Jakobs when he came to that conclusion of no significant impact on an adopted emergency evacuation plan.

Grp 12-15

Wildfire safety and evacuation routes are the number one concern for residents of Banner Mountain during fire season, which is now more than half the year. Brunswick Road and subsequent entry onto SR 20/49 is already a major evacuation bottleneck not just for residents evacuating from Greenhorn Road but also from Banner Lava Cap and Idaho Maryland roads, and would be worse with the additional mine truck traffic.

Chapter 5.6 (*Significant and Unavoidable Impacts*) already identifies a significant, unmitigated traffic impact to the Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive intersections, but there is no assessment of how this significant impact affects evacuation scenarios for Banner Mountain residents.

The DEIR offers no analysis quantifying how much worse it would be during construction and operation of the project and whether the additional traffic might physically interfere with an emergency evacuation plan. Banner Mountain residents are not reassured by skimpy and vague language in the DEIR that the incident commander would contact dispatch to request the mine operator to shut down the mine and cease truck hauling operations.

Grp 12-16

a. Please revisit the conclusion of no significant impacts to implementation of evacuation plans with the following additional analysis and information:
   - A more detailed analysis of the effects of project traffic during construction and operation on evacuations in any residential areas that might use Brunswick/SR 20/49 and Brunswick Road/SR 174 access for evacuation egress.

Grp 12-17

   - Details on the process and timing of notification for mine shutdown and cessation of truck hauling operations. For example, what would be the trigger for notification that the mine needs to shut down and cease truck traffic? Would a voluntary evacuation order on Greenhorn Road carry the same weight as a mandatory evacuation order to trigger cessation of truck traffic? Would voluntary or mandatory evacuation orders in any area that might need to use Brunswick/S R 20/49 or Brunswick/SR174 for egress trigger a requirement to cease operations and truck hauling? The analysis needs to extend beyond those areas: "*In the vicinity of the proposed mine*" but rather include all areas where residents might need to use Brunswick Road/SR 20/49 or Brunswick/SR174 for evacuation. Please be aware that, depending on the location of the fire, thousands of residents on Banner Mountain and in Cascade Shores might need to use the Brunswick/SR 20/49 area for evacuation.

Grp 12-18

   - Details on specifically who (title/position) would be contacted at the mine and confirmation that this person has the authority and means to immediately cease mine operations and truck hauling. Please also provide an estimate as to how long this notification and shut-down process would take and the effect of delays in shutting down truck operations on evacuations.

Grp 12-19

   - Provide additional support for the conclusion that the project would not impair implementation of an emergency evacuation plan and that no mitigation is required. We believe that mitigation may be required and that a draft Wildfire Evacuation Plan should be prepared which provides the specific details we request above.

Our members are also concerned about the potential impacts of on-site temporary storage of mine waste material, which is not discussed in the DEIR. The DEIR does not provide sufficient information to demonstrate that mine waste disposal by off-site sales would be viable. The applicant proposes to sell waste rock on the open market if it is still being produced after the two proposed waste rock piles reach capacity. The market for aggregates varies significantly by season and during rainy seasons it might be necessary to stockpile the aggregate onsite. However, there are no provisions for onsite storage in the DEIR or an assessment of impacts related to such storage. Dispersing waste rock and other mine waste over large areas without containment often results in contamination but this potential impact is not assessed in the DEIR.

Grp 12-20

The Regional Water Quality Control Board (RWQCB) has jurisdiction over the disposal location requirements for mine waste rock to make sure discharges would not pose a threat to water quality, but there is no information

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in the DEIR acknowledging this approval process is required. Although the DEIR does not discuss this, the concept of selling waste rock may not be feasible and alternative disposal methods should be considered. The absence of provisions for temporary waste rock storage (and the associated analysis of its impact) creates strict operational constraints and potential impacts on all phases of processing, but this impact has not been addressed in the DEIR. To address these concerns, please provide the following in the FEIR:

b. An analysis of the impacts of on-site storage of mine waste disposal and alternatives to off-site sales for mine waste disposal, and the impacts of those alternatives.

Grp 12-21

Management of asbestos-laden mined materials is not adequately addressed in the DEIR. Asbestos is likely to be released during underground blasting, crushing, and ore processing and during on-road transport, placement grading and compaction. The DEIR states that the Asbestos Management Plan would ensure that average mined material and engineered fill contains less than 0.01% asbestos. (DEIR Page 3-20). However, testing the asbestos content does not control the amount of asbestos in the actual material mined. To control the average amount of asbestos in output materials (and to avoid significant impacts related to asbestos exposure), but currently, the DEIR does not include any evidence that asbestos levels will not exceed this threshold. The testing process may require up to two weeks before the results are known, yet the project would continue daily mining activities during this time. This daily mined material would have to be stockpiled while awaiting the test results, which could expose workers to dangerous of asbestos. Furthermore, if the running average of asbestos in the daily mined material exceeds the required threshold, batches containing higher asbestos levels would have to be stockpiled in order to be later mixed with batches having lower asbestos levels. The DEIR does not disclose this fact nor does it analyze the associated impacts. The mineral processing described in the DEIR does not address the need for stockpiling materials or address the likely impacts of such efforts. To address this concern, please provide the following in the FEIR:

c. A revised Asbestos Management Plan that provides details on all of the steps necessary to safely manage this hazardous waste, including the location and organization of stockpiled materials, and safeguards to avoid fugitive dust emissions and potentially hazardous conditions.

6. Noise/Vibration

Grp 12-22

Many of our members choose to live on Banner Mountain because of the quiet and peaceful setting it offers, so potential noise and vibration impacts from the mine are a source of great concern. Some of the mine operations would generate noise levels of 85 dBA and begin early in the morning and extend into the evening, and some operations would occur 24 hours per day for 80 years. Tunneling and blasting would occur for 80 years, but DEIR does not identify the hours of these operations. The DEIR concludes that the project would not have significant noise impacts because they would comply with general County noise standards, but compliance with County standards is not the same as "less than significant" noise impacts.

Grp 12-23

In our quiet neighborhoods on Banner Mountain typically the only nighttime noises are the calls of Pacific chorus frogs in spring. But the DEIR states that because the project will comply with the County's nighttime noise level standards, an evaluation of sleep disturbance is not warranted. We disagree with this assertion because the project includes many operations that will occur during early morning or nighttime hours, including dewatering, indoor facility construction, truck loading/unloading and off-site hauling mineralization processing, and water treatment. The combination of morning and nighttime industrial activities and low background/ambient noise levels could definitely cause sleep disturbance for many of our members.

Grp 12-24

The DEIR identifies mine development (tunneling) and gold mineralization production (tunneling and production blasting) as part of the project, but it does not identify the hours of operation for these project components. The DEIR states that underground exploration and mining would occur 24 hours per day, 7 days per week, and assuming that underground exploration and mining include mine development and gold mineralization production, tunneling and blasting could occur at night. If this is the case, the project's noise and vibration impacts would be far more severe than the DEIR discloses.

Without explicit restrictions in the DEIR' s project description pertaining to the hours of tunneling and blasting, coupled with conditions of approval, the DEIR cannot simply assume that tunneling and blasting operations would not occur at night and would not adversely impact nearby receptors. The DEIR should have clearly identified the hours of mine development and gold mineralization production. The DEIR should have evaluated these impacts and identified and specified appropriate mitigation for nighttime noise.

Grp 12-25

The DEIR does not consider the absolute increase in noise levels compared to ambient background conditions. As described in the Salter Report (letter to Shute, Mihaly & Weinberger, from Salter Inc., dated March 9, 2022) certain operations could be 25-35 dB above background ambient noise levels. These noise levels would be perceived as more than four times as loud as the median ambient noise levels. The DIER assesses these impacts as less than significant because overall noise from these operations would not exceed the County's standards. The DEIR should have evaluated both the increase in noise level and the absolute noise level associated with the project.

Grp 12-26

Noise and vibration measurements were taken only at the Centennial and Brunswick sites and along the proposed pipeline location between the two sites. While processing would occur on these sites, tunneling and blasting would occur throughout the 2,585-acre mineral rights boundary under Banner Mountain. Tunneling and blasting could certainly result in excessive noise levels and vibration, but DEIR provides no evidence that noise and vibration impacts were measured throughout the entire mineral rights boundary. Many of our members live in areas immediately above or near the 2,585-acre mineral rights boundary, but the DEIR does not describe noise and vibration impacts to these residents. The DEIR should have disclosed the project's potential for noise and vibration impacts throughout the entire mineral rights boundary.

Grp 12-27

The DEIR does not adequately distinguish the project's construction-related noise sources from its operational noise sources. This distinction is very important because the DEIR asserts that the County's noise standards do not apply to construction-related activities. If the DEIR characterizes an operational activity as a construction project it may have incorrectly determined such impacts to be exempt from the County's noise standards and also determined the impact to be less-than-significant under CEQA. For example, the DEIR states that mine development (tunneling) would be constructed throughout the life of the mine which would require drilling and the use of explosives, and a new mine shaft would be
developed on the Brunswick Site. These massive project components appear to be characterized as construction activities, but would potentially extraordinarily noisy as they would require extensive drilling and rock excavation. If these are activities are considered construction rather than operation, it inappropriately assumes the noise from these sources would be exempt from the County's noise standards.

Grp 12-28

The DEIR relies on varying thresholds for the project's traffic and on-site noise sources. It uses a numerical increase in noise only to determine the significance of the project's traffic noise impacts, specifying +5.0 dB or more as constituting a significant traffic noise impact. For on-site noise sources, it relies on the noise limits included in the Nevada County General Plan Noise Element and the Nevada County Land Use and Development Code. The DEIR should have assessed project's noise levels relative to the noise levels that residents actually experience (ambient noise) rather than to the County's standards.

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Grp 12-29

The DEIR asserts that vibration from the project's blasting operations would be barely perceptible to nearby receptors. The DEIR identifies a 0.4 in/sec peak particle velocity (PPV) vibration limit based primarily on a vibration study performed following an underground nuclear blast in Mississippi in 1964. As described in the Salter Report, human responses to a single blast does not reflect the impact on the community from ongoing, perceptible and potentially unpleasant vibration over the 80-year lifespan of this project. the DEIR ignores guidance by the U.S. Office of Surface Mining and Reclamation and Enforcement:
All blasting must take place during daylight hours unless more restrictive times are specified. If night-time blasting is approved by the regulatory authority, it must be based on evidence from the operator that the public will be protected from adverse noise and other impacts.

The DEIR provides no evidence that the public will be protected from adverse effects from the project's blasting operations and does not include restrictions on blasting vibration during evening and nighttime hours. According to the Salter Report, residents could experience "strongly perceptible" and borderline "unpleasant" vibration as a result of blasting. This impact would occur for 80 years. The DEIR does not disclose this significant impact.

Grp 12-30

To evaluate the project's blasting-related noise impacts, the DEIR relies on noise measurements conducted at the Sutter Gold underground mine in Amador County. The Sutter Gold study found blasting noise to be 75 dBA, on average, at a distance of 200 feet from the mine portal. However, to translate those findings to the Project's Brunswick Site, the DEIR assumes that noise at the project site would be reduced by 20 dB compared to the Sutter Gold mine. Other than mentioning the difference in orientation and size of the portal, this claim of 20 dB noise reduction is unsubstantiated. As described in the Salter Report twenty decibels of noise reduction is a substantial change in noise emission. Without the unsubstantiated 20 dB of reduction, the Salter Report notes that the blasting noise at the nearest sensitive receptors would be between 72 and 77 dBA. As stated in the DEIR, ambient median and "background" noise levels at many sensitive receptors is between 35 dBA and 50 dBA. Therefore, the blasting noise could be substantially above the ambient noise levels, by approximately 25 to 40 dB.

Grp 12-31

a. To address these concerns about noise and vibration impacts that would affect many of our members, please provide a revised analysis of noise and vibration that includes the following:

- Clearly identify the hours of mine development and gold mineralization production. If these operations occur at night or early in the morning, please evaluate the potential for noise and vibration to cause sleep disturbance and include appropriate mitigation for nighttime noise.
- Evaluate both the increase in noise level and the absolute noise level associated with the project.
- Assess the project's potential for noise and vibration impacts throughout the entire 2,585-acre mineral rights boundary where many of our members reside.
- Categorize each project component as either construction-related or operation-related and for each construction-related component provide details such as the construction-phasing plan, including the timing and duration of each and every project. This analysis should include each construction-project that is expected to occur over the project's 80-year timeframe.
- Evaluate the project noise levels relative to the noise levels that residents actually experience (ambient noise) rather than to the County's standards.

7. Biological Resources

Grp 12-32

The foothill yellow-legged frog, a species listed as Endangered by the California Department of Fish and Wildlife (CDFW), could occur in the South Fork of Wolf Creek at the Centennial and Brunswick sites and also downstream of those sites. [Please note that the foothill yellow-legged frog is listed as Endangered under the California Endangered Species Act, not a Candidate for Threatened as incorrectly stated in DEIR Table 4.4-6 and on DEIR Page 4.4-37.] DEIR Page 4.4-37 states: "*The main stem of Wolf Creek within the Centennial Industrial Site is considered suitable habitat for this species*" and notes that it has been documented within 3.9 miles of the site. Then in the same paragraph the DEIR inexplicably characterizes the potential for this species to occur at the Centennial as "very low" despite the fact that suitable habitat is present. No protocol level Visual Encounter Surveys were conducted for this species at the Centennial site.

Grp 12-33

The impact analysis and proposed mitigation for foothill yellow-legged frog and for other special-status aquatic species like western pond turtle is focused on construction impacts rather than the operational effects of discharging mine water to the South Fork of Wolf Creek for 80 years. Potential impacts of mine water discharges on the aquatic life in the South Fork of Wolf Creek are dismissed by stating that these discharges would need to comply with Central Valley Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) No. CAG995002 and that monitoring of NPDES regulated parameters (e.g., temperature, pH, turbidity, dissolved oxygen) would be conducted to ensure the project stays within safe threshold limits identified within the NPDES discharge requirements. However, we are concerned that mine water discharges would overheat the South Fork Wolf Creek. Mine water ranges between 14 and 15 degrees Celsius, and NPDES requirement specifies that the discharge temperature not exceed existing temperature in the South Fork of Wolf Creek by more than 5 degrees Fahrenheit (2.8C). The DEIR provides a range of values for creek flow and temperature but it is based on just a few samples collected in April and August of 2019 and Jan 2020. More than 15 years of monitoring by the Wolf Creek Community alliance provides data indicating that the temperature of the creek often falls substantially below 10 degrees C, and that these temperatures commonly occur during low flow times. As described above, we are also concerned about water quality impacts and the effects that the discharges will have on foothill yellow-legged frogs, western pond turtles and the benthic macroinvertebrates upon which these species and many others rely.

a. To address this concern, please provide the following information in the FEIR:

- A comprehensive assessment of impacts to foothill yellow legged frogs, western pond turtles and other aquatic life in the South Fork of Wolf Creek resulting from the discharge of mine water over an 80-year period. This assessment should be based on a detailed analysis of the water quality treatment processing and a comprehensive discussion of proposed water quality monitoring.
- Please also provide details on what immediate and long-term remedial actions would be taken if the NPDES water quality monitoring results indicate that NPDES thresholds are not being met. Please clarify whether mine operation and dewatering would cease until NPDES water quality thresholds are met, and if not, what the impact would be on continued water quality impacts on foothill yellow legged frogs, western pond turtles and other aquatic life in the South Fork of Wolf Creek.

Grp 12-34

A population of Pine Hill flannelbush, as species listed as federally Endangered and a California Rare Plant, was observed at the Centennial site. The DEIR states that 18 Pine Hill flannelbush plants would be directly impacted by proposed engineered fill placement at the Centennial Site. Mitigation for this impact refers to DEIR Appendix F.4, a Habitat Management Plan (HMP) for this species, and DEIR Mitigation Measure 4.4-1(a) indicates that only Steps 1-4 of the HMP would be required before issuance of a grading permit. HMP Steps 1-4 involve seed

collection and transplantation. Step 5 (DEIR Page 4.4-65-66) requires more seed collection and transplanting if the Steps 1 – 4 are not successful, and also calls for:

> *"Habitat Enhancement: Prior to issuance of grading permits, pursuant to the HMP, the applicant shall enhance Pine Hill flannelbush habitat outside the disturbance footprint, which could include removal of invasive plants and conducting a pilot study by collaborating with CAL FIRE or other research facility to conduct prescribed fire in areas to enhance natural germination and recruitment, as Pine Hill flannelbush need fire for successful germination, and root sprouts.*
>
> *Conservation Easement: Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any offsite areas not owned by the applicant where the transplants are to be located."*

This mitigation measure is internally inconsistent; the Step 5 requirements for habitat enhancement and a conservation easement indicate that these measures should be implemented before issuance of the grading permit, but the language in the introductory paragraph of Mitigation Measure 4.4-1(a) indicates that it would be implemented only if Steps 1-4 are not successful.

We believe that all of the recommendations in the HMP should be implemented before issuance of the grading permit. Mitigation for impacts to this beautiful and rare plant should not be delayed and should not be mitigated solely by relying on transplants. Mitigation should focus on the more comprehensive and ecosystem-based approach described in the HMP to fully mitigate for project impacts rather than just relying on putting transplants in the ground.

Development of the habitat enhancement plan would be time consuming and will require extensive coordination with agencies such as CalFire, CDFW, and USFWS (and should also include the Redbud Chapter, our local California Native Plant Society) and therefore this collaborative effort should begin now. Waiting until after the monitoring results from the transplanting are available would delay development of the habitat enhancement plan and direct impacts to the Pine Hill flannelbush population at the Centennial site would go unmitigated for years. The HMP should be revised to provide more details on the proposed habitat enhancement plan, what activities that plan would include, and an assessment of how enhancement activities would fully mitigate for project impacts.

Grp 12-35

The HMP should be revised to provide more details on the proposed conservation easement, including identifying entities that could serve as easement holders, an estimate of stewardship costs for ongoing management of the easement lands in perpetuity, and a source of funding for those costs. Such costs are typically calculated with a Property Analysis Record or some other tool.

Grp 12-36

The HMP (page 6-1) indicates that flannelbush seed collection was conducted on August 21, 2019 with Mr. Brett Hall from the UC Santa Cruz Arboretum as a part of the UC Santa Cruz Native Plant Program. The HMP should provide an update on the status of those seedlings so the public can have some assurances that the transplantation proposed as mitigation is on a successful trajectory.

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Grp 12-37

b. To address these concerns discussed above about mitigation for Pine Hill flannelbush, please provide the following:

- A revised Mitigation Measure 4.4-1(a) that calls for implementation of Steps 1 -5 from the Pine Hill Flannelbush HMP before issuance of grading permits.
- A revised Pine Hill Flannelbush HMP that includes the additional details on habitat enhancement and conservation easements discussed above, as well as updates on the status of the seeds collected in August 2019.

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GROUP LETTER 12: EDWARD SYLVESTER, FRIENDS OF BANNER MOUNTAIN

Response to Comment Grp 12-1

This is an introductory comment. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - (Non-EIR/Administrative Issues). The comment also expresses general concern regarding the alleged inadequacy of the DEIR. The commenter provides specific concerns in the following portion of the letter, which are addressed below.

Response to Comment Grp 12-2

The commenter requests that the County maintain a public website page about the project during construction and operation of the mine, so the public can have access to monitoring reports without submitting a public records act request. The commenter also makes specific requests about the contents of the mitigation monitoring and reporting program. This comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 12-3

The commenter requests that the FEIR include discussion of the County's plan to provide public access to monitoring reports, permit applications and any technical studies that are produced during mine construction or operation. Additionally, the commenter requests that in the FEIR, the County explain the source of funding for mine oversight and monitoring. This comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 12-4

The commenter asserts that the applicant may become insolvent and not be able to pay for mitigation required in the DEIR, and requests that the DEIR include a discussion on funding for restoration and mitigation activities in the case of mine operator insolvency or mine shutdown. Mitigation requirements in the DEIR are required to be implemented prior to the commencement of the project action that would cause the respective impact. As such, impacts would not be allowed to occur prior to implementation of mitigation beforehand. This comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 12-5

The commenter suggests that the construction timeline provided in the DEIR is unrealistically short and should be lengthened to reflect sequential construction tasks. Please see Master Response 24 – Project Construction Schedule.

Response to Comment Grp 12-6

The commenter asserts that the groundwater analysis should have contemplated mining within the entire 2,585-acre mineral rights area and that insufficient data was used in the groundwater model. There are not valuable gold deposits within the entire 2,585-acre mineral rights area, thus, presuming that mining would occur in the entire mineral rights area would not be accurate. Moreover, the applicant has specific areas that will be targeted for gold extraction, and the groundwater model is based on that plan, along with reasonable assumptions about potential extension of mining into other areas. The groundwater model did look at potential drawdown within the entire mineral rights area, but only a small number of wells were shown to have a significant impact, prior to mitigation. Please see Master Response 7 - Location of Future Mining Areas, and Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 12-7

Regarding age and amount of well data: See Response to Comment Grp 7-23.

Regarding the service shaft and near surface working in relations to the ground water model: please see Responses to Comments Grp 7-80 and Grp 7-81.

Regarding the recharge rate where the engineered fill will be placed: please see Response to Comment Grp 7-78.

The groundwater model does not assume that the rock is homogenous and includes changes in hydraulic conductivity with depth, geological units, and faults. Please see Chapter 4.8 and Appendices K.2 and K.3 of the DEIR and Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 12-8

Regarding the drain outflow data from previous studies: please see Response to Comment Grp 7-68.

Measurements of current water flow from the drains is not based on the measurement of the water level in the Brunswick Shaft. The water flow from the mine drains was measured directly as is discussed in Chapter 4.8 of DEIR and Appendix K.2 of the DEIR. Please also see Responses to Comments Grp 7-69 through Grp 7-76.

Response to Comment Grp 12-9

Please see Response to Comment Grp 21-110 and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The commenter asserts that the requirement to collect groundwater data is inappropriate deferral of mitigation. However, Mitigation Measure 4.8-2 requires "Water-level monitoring data for a minimum of 12 months before commencement of dewatering of the mine." As such, the collection of data is not deferred and is required by the DEIR before dewatering commences.

Response to Comment Grp 12-10

Please see Response to Comment Grp 21-119 and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to the commenter's request that groundwater monitoring networks be established before the project commences, see Response to Comment Grp 12-9 above.

Response to Comment Grp 12-11

Please see Master Response 16 - Drought and Climate Change. In response to the commenter's questions on water supply, the Nevada Irrigation District (NID) approved a water supply assessment (WSA), which concluded that NID has sufficient water to supply the project and its existing customers.

With regard to NID's Water Shortage Contingency Plan, as described in NID's 2020 UWMP (Chapter 6 Drought Plan) and the WSA (Section 6.2 Additional Planned Future Potable Water Supplies), there are numerous management and operational efforts available to NID to address supply shortfalls during drought periods. Demand reductions, carryover storage strategies, system operational strategies, supplemental supplies, increased storage, and others are all options available to NID in the event of a water shortage condition. NID will evaluate each specific shortage condition and select the appropriate response action(s) for implementation. If supplies become extremely critical requiring implementation of Stage 6 of NID's Water Shortage Contingency Plan, drinking water supplies to NID's treated water and municipal water customers may be reduced to health and safety use of water only, but would not be cut off.

NID is in the early stages of a long-term visioning and planning effort to better understand potential future conditions and needs in response to climate change, and identify management and operational practices to meet those needs. The process, Plan for Water, will identify optional water management practices as triggering points if supply, demand, regulatory, legal, and other events are reached. These practices may include supply projects, demand management efforts, policy changes, and others. As the Plan for Water process is developing mitigation measures for drought resiliency, NID will continue to implement its current drought and water shortage contingency efforts as described in NID's 2020 UWMP.

Response to Comment Grp 12-12

This comment summarizes the prior comments Grp 12-7 through Grp 12-11. Please see Responses to Comments Grp 12-7 through Grp 12-11, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 12-13

Please see Response to Comment Grp 7-12.

Water sampling data from the drains at Wolf Creek have already been provided in the DEIR. See Chapter 4.8 and Appendix K.2 of the DEIR.

Response to Comment Grp 12-14

The commenter asserts that the project's truck traffic may impair emergency evacuations and asserts that further analysis is required. However, the project truck traffic accounts for only approximately 1% of typical traffic on Brunswick Road and would not affect an evacuation. Please see Master Response 5 – Evacuation Zones.

Response to Comment Grp 12-15

Project traffic would not affect an evacuation for residents on Greenhorn, Banner Lava Cap, or Idaho-Maryland Roads. Please see Master Response 5 – Evacuation Zones. The commenter states that Chapter 5.6 identifies a significant, unmitigated traffic impact to the Brunswick Road/Idaho-Maryland Road intersection. This is incorrect. Page 5-11 of the DEIR states the following:

> The EIR requires implementation of Mitigation Measures 4.12-1(a-c), which would reduce the project's significant effect to the Brunswick Road/Idaho-Maryland Road intersection and the Idaho-Maryland/Centennial Drive intersection; however, the project's impact to the SR 174/Brunswick Road intersection would remain *significant and unavoidable*. The reason for this is that while Mitigation Measure 4.12-1(b) requires the applicant to enter into a traffic mitigation agreement with the County and provide the project's fair share toward needed improvements, the remaining funds for the intersection improvements are unknown, in terms of timing and contributing parties.

The text says the project's impact to the SR 174/Brunswick Road intersection would remain significant and unavoidable after mitigation, not the Brunswick Road/Idaho-Maryland Road intersection. To further demonstrate this, page 4.12-66 of the DEIR states the following:

> *Brunswick Road/Idaho-Maryland Road*
>
> Signalization would improve the Brunswick Road/Idaho-Maryland Road intersection to LOS D. This intersection is identified to be signalized in the City of Grass Valley GVTIF. Under EPAP Plus Project (Scenario #1), the project is expected to add 35 additional vehicles through the intersection during the 3:30-4:30 PM time period, and under EPAP Plus Project (Scenario #2), the project would add 47 additional vehicles. Mitigation Measure 4.12-1(a) requires the applicant to pay the GVTIF to the City of Grass Valley,

> given that the needed intersection improvement is included in the City's TIF. Thus, payment of the GVTIF would reduce the impact to a *less-than-significant* level.

The commenter has a similar misunderstanding of the Idaho-Maryland/Centennial Drive intersection. The text on page 5-11 of the DEIR says the project's impact to the SR 174/Brunswick Road intersection would remain significant and unavoidable after mitigation, not the Idaho-Maryland Road/Centennial Drive intersection. To further demonstrate this, page 4.12-66 of the DEIR states the following:

> *Idaho-Maryland/Centennial Drive*
>
> Signalization will improve the Idaho-Maryland/Centennial Drive intersection to LOS D. This intersection is identified to be signalized in the City of Grass Valley GVTIF. Under EPAP Plus Project (Scenario #1), the project is expected to add 18 additional vehicles through the intersection during the 3:30 to 4:30 PM time period, and under EPAP Plus Project (Scenario #2), the project would add 15 additional vehicles. Mitigation Measure 4.12-1(b) requires the applicant to pay the GVTIF to the City of Grass Valley, given that the needed intersection improvement is included in the City's TIF. Thus, payment of the GVTIF would reduce the impact to a *less-than-significant* level.

While the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, there are a few important factors to consider. First, this intersection would not serve as a key evacuation route for the area in question, and residents in the intersection area have multiple routes to evacuate the area (e.g., Lower Colfax Road, Rattlesnake Road, SR 174 EB). Second, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

Response to Comment Grp 12-16

Please see Response to Comment Grp 12-15 and Master Response 5 – Evacuation Zones.

Response to Comment Grp 12-17

If regular traffic were interfering with an evacuation, local authorities would implement traffic control and the project traffic, which is relatively minor in comparison to existing traffic, would also be redirected to minimize interference. Please see Master Response 5 – Evacuation Zones.

Response to Comment Grp 12-18

Please see Responses to Comments Grp 12-14 and Grp 12-17. Please also see Master Response 5 – Evacuation Zones. The project would have a manager present onsite at all times, who would be available should Nevada County Regional Dispatch Center contact the operation to request the mine to shut down trucking.

Response to Comment Grp 12-19

Please see Master Response 5 – Evacuation Zones.

Response to Comment Grp 12-20

Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Please also see Chapter 4.8 of the DEIR and Master Response 8 - Mine Waste Characterization.

Response to Comment Grp 12-21

The project does not propose temporary stockpiles of mine waste, and would hold that material in silos until it is picked up by trucks for engineered fill use or for sale as construction aggregate. Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

In regard to asbestos: Please see Responses to Comments Grp 7-6 and Grp 7-7, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Grp 12-22

The commenter disagrees with the DEIR's conclusion that noise impacts would be less than significant, states that an evaluation of sleep disturbance is warranted, and states that the DEIR does not disclose the hours in which blasting would occur. Hours for noise generating activities are described in Chapter 4.10 and Appendix L of the DEIR. In regard to hours of blasting, see Responses to Comments Grp 21-143 and Grp 21-144. With regard to sleep disturbance analysis, please see Response to Comment Grp 21-130.

County noise standards are not the only standard of significance used for the noise analysis, as the DEIR also considered a substantial increase in ambient noise levels to be a significant increase, even if the noise does not exceed the County noise standard. Please see Section 4.10.3, and Table 4.10-5 of the DEIR.

Response to Comment Grp 12-23

Please see Response to Comment Grp 21-130.

Response to Comment Grp 12-24

Please see Responses to Comments Grp 21-130, Grp 21-143 and Grp 21-144.

Response to Comment Grp 12-25

See Response to Comment Grp 21-133.

Response to Comment Grp 12-26

The project's potential for noise and vibration throughout the entire mineral rights boundary has already been considered in the EIR. The DEIR's analysis of blasting vibrations is based on an assumption that blasting would take place a minimum of 500 feet below surface. Any noise from blasting would only be at the opening to surface at the two shafts on Brunswick site which has already been analyzed in Chapter 4.10 of the DEIR. As such, the location of noise sources of the project would not change based on the area of mining underground. Please also see Master Response 7 - Location of Future Mining Areas.

Response to Comment Grp 12-27

The commenter asserts that construction noise was not differentiated from operation noise in the DEIR. However, the DEIR specifically analyzed the separate noise impacts of construction and of operations. As stated on page 4.10-16 of the DEIR, the Nevada County Land Use and Development Code exempts construction noise from the County noise standards. Nonetheless,

an evaluation of construction noise is provided in the DEIR for purposes of CEQA analysis. See Chapter 4.10 of the DEIR.

Response to Comment Grp 12-28

The commenter states that for on-site noise sources, the DEIR relies on noise limits included in the Nevada County General Plan and Nevada County Land Use and development Code and should have assessed project noise levels relative to the noise levels that residents actually experience (ambient noise) rather than to the County's standards. Because the County's noise standards are adjusted upwards or downwards based on ambient conditions, the DEIR analysis effectively did evaluate impacts relative to ambient conditions by applying the appropriate offsets to the County's standards to account for the baseline ambient conditions. Specifically, application of standards 5 dB above the ambient are required where baseline ambient conditions currently exceed the County standards and, where baseline ambient levels are more than 5 dB below the County standards, the standards have been set at the baseline ambient level plus 5 dB. Finally, where ambient conditions are less than 5 dB below the County standards, no adjustment for ambient conditions is applied in the analysis. Table 6 of Appendix L (Table 4.10-6 of the DEIR) shows the baseline ambient conditions at each representative receptor extrapolated from the ambient noise survey results and the corresponding maximum and average, daytime, evening, and nighttime noise level standards applicable at each representative receptor location after the appropriate adjustments to the County standards have been applied to account for the baseline ambient conditions. Please see pages 18-28 of Appendix L of the DEIR for a detailed discussion of applicable noise standards by receptor. Nonetheless, in response to this comment, the following two additional tables were prepared to provide the increase in ambient noise levels for each receptor location during daytime and nighttime periods, respectively. As indicated in Tables A & B, the project-related increases in ambient noise levels from all on-site noise sources are below the 5 dBA threshold for a finding of a significant noise increase.

Response to Comment Grp 12-29

Please see Responses to Comments Grp 21-143 and Grp 21-144.

Response to Comment Grp 12-30

See Response to Comment Grp 21-145.

Response to Comment Grp 12-31

Please see Responses to Comments Grp 12-22 through Grp 12-29.

Response to Comment Grp 12-32

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 12-33

Please see Chapter 4.4 of the DEIR and Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Table A
Project-Related Increases in Daytime Ambient Noise Levels at the Nearest Sensitive Receptors
Idaho-Maryland Mine Project - Nevada County, CA

	Existing Daytime Ambient Noise		Project Daytime Noise Generation		Existing + Project Noise Levels		Project-Related Noise Increase	
Receptor	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax
1	58	76	56	68	60	76	2	0
2	63	81	54	67	63	81	0	0
3	61	82	39	46	61	82	0	0
4	55	72	37	43	55	72	0	0
5	49	66	29	34	49	66	0	0
6	50	67	29	34	51	67	1	0
7	49	66	29	33	49	66	0	0
8	54	72	38	48	54	72	0	0
9	48	66	35	41	48	66	0	0
10	47	66	34	40	47	66	0	0
11	47	67	34	42	47	67	0	0
12	49	69	33	41	49	69	0	0
13	51	70	34	43	51	70	0	0
14	50	72	41	48	51	72	1	0
15	51	73	44	55	52	73	1	0
16	48	71	45	51	50	71	2	0
17	56	73	43	49	56	73	0	0
18	52	69	47	53	53	69	1	0
19	54	69	41	50	54	69	0	0
20	57	72	47	55	58	72	1	0
21	55	70	47	58	56	70	1	0
22	56	71	51	62	57	71	1	0
23	58	73	55	67	60	73	2	0
24	60	75	50	66	61	75	1	0
25	60	75	49	67	60	75	0	0
26	51	64	51	68	54	68	3	4
27	51	64	46	57	52	64	1	0
28	51	64	46	57	52	64	1	0
29	51	64	40	50	51	64	0	0
30	51	64	34	39	51	64	0	0

Table B
Project-Related Increases in Nighttime Ambient Noise Levels at the Nearest Sensitive Receptors
Idaho-Maryland Mine Project - Nevada County, CA

	Existing Nighttime Ambient Noise		Project Nighttime Noise Generation		Existing + Project Noise Levels		Project-Related Noise Increase	
Receptor	Leq	Lmax	Leq	Lmax	Leq	Lmax	Leq	Lmax
1	50	66	14	15	50	66	0	0
2	55	71	14	16	55	71	0	0
3	51	69	17	21	51	69	0	0
4	56	70	17	20	56	70	0	0
5	50	64	13	17	50	64	0	0
6	51	65	14	18	51	65	0	0
7	50	64	17	19	50	64	0	0
8	45	65	14	16	45	65	0	0
9	39	59	20	25	39	59	0	0
10	37	58	19	25	37	58	0	0
11	37	59	20	26	37	59	0	0
12	39	62	18	20	39	62	0	0
13	41	64	22	28	41	64	0	0
14	42	64	31	39	42	64	0	0
15	43	65	36	45	43	65	1	0
16	40	62	40	48	43	62	3	0
17	57	71	36	45	57	71	0	0
18	53	67	41	49	53	67	0	0
19	46	65	36	42	47	65	1	0
20	50	68	39	43	50	68	0	0
21	48	66	33	37	48	66	0	0
22	48	67	28	30	48	67	0	0
23	51	69	24	27	51	69	0	0
24	53	71	23	27	53	71	0	0
25	52	71	25	28	52	71	0	0
26	44	56	26	31	44	56	0	0
27	44	56	25	29	44	56	0	0
28	44	56	26	29	44	56	0	0
29	44	56	26	30	44	56	0	0
30	44	56	24	28	44	56	0	0

Response to Comment Grp 12-34

Mitigation Measure 4.4-1(a) includes three different and independent requirements to mitigate project impacts to the Pine Hill flannelbush. The first measure requires the preparation of a habitat management plan, a draft of which was included in Appendix F.4. The habitat management plan (i) is to mitigate the direct loss of 18 Pine Hill flannelbush as a result engineered fill placement and the potential indirect loss of 4 Pine Hill flannelbush within 30 feet of the edge of the engineered fill. The second measure (ii) requires the Project Proponent to enhance the Pine Hill flannelbush habitat that would not be impacted by engineered fill placement. The third measure (iii) requires a conservation easement be placed on the onsite Pine Hill flannelbush avoidance area and any offsite transplant areas. All measures are required to be completed prior to the issuance of a grading permit. This is hereby clarified in the revised mitigation measure text in the EIR (page 4.4-69), as shown below.

4.4-1(a) *i.* *Prior to issuance of grading permits for the Centennial Industrial Site, the Project Applicant shall obtain an Incidental Take Permit (ITP) from CDFW for Project-related impacts to the Pine Hill Flannelbush. During the consultation process with CDFW, the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP) shall be revised if required by CDFW, and must be approved by CDFW prior to implementation. This HMP shall include habitat enhancement and conservation easement requirements. If the USFWS determines that the plants within the Study Area are the federally endangered Pine Hill flannelbush prior to project implementation, then a USFWS Biological Opinion must also be secured, and the USFWS would also need to approve the HMP prior to implementation. Note that the measures outlined below are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.*

Prior to issuance of grading permits for the Centennial Industrial Site, implement project-specific mitigation measures 1-3 outlined below consistent with the County and CDFW approved HMP, as well as the Habitat Enhancement and Conservation Easement. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits).~~implement project-specific mitigation measures 1-3 within the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP), to the satisfaction of the County, USFWS and CDFW. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits):~~

1. *Seed Collection;*

   Collect seed for seedbanking and for future replacement and recovery efforts pursuant to the requirements of Section 6.2 of the HMP.

2. *Develop Transplantation Plan and Monitoring Plan;*

   The Transplantation and Monitoring Plan shall be developed in consultation with USFWS and CDFW, and shall, at a minimum, address location(s) for dormant season relocation, site selection for transplanting, and metrics of successful establishment (i.e., Section 6 of the HMP).

3. *Transplanting;*

   Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.

4. *Transplant Monitoring; and*

   Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants, transplanting will have been deemed successful.

5. *Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)*

   If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken:

   - *Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.*
   - *Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.*
   - *Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.*
   - *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.*

ii. *Habitat Enhancement:* *Prior to issuance of grading permits, pursuant to the HMP, the applicant shall enhance Pine Hill flannelbush habitat outside the disturbance footprint, which could include removal of invasive plants and conducting a pilot study by collaborating with CAL FIRE or other research facility to conduct prescribed fire in areas to*

enhance natural germination and recruitment, as Pine Hill flannelbush need fire for successful germination, and root sprouts.

iii. Conservation Easement: Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any offsite areas not owned by the applicant where the transplants are to be located.

The above revisions are for clarification purposes and do not alter the conclusions of the DEIR.

Response to Comment Grp 12-35

Comment noted. The requested level of detail is not required for a mitigation measure.

Response to Comment Grp 12-36

Comment noted. This additional information requested by the commenter is not necessary to analyze and conduct an impact analysis resulting from potential project impacts.

Response to Comment Grp 12-37

Please see Responses to Comments Grp 12-34 through Grp 12-36 above.

Group Letter 13

Gold Country Avian Studies
14401 Pierite Road Nevada City, CA 95959 (510)541-9078

To: Nevada County Planning Commission
Attn: Matt Kelley, Senior Planner
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Mr. Kelley and the Nevada County Planning Commission,

Grp 13-1

I am a biologist and the director of Gold Country Avian Studies (GCAS), an organization focusing on avian research and education in the Sierra Foothills. We have found that the DEIR for the proposed Idaho Maryland Mine (IMM) project is deficient in numerous areas that would directly affect the environment and wildlife of the Centennial and Brunswick sites, as well as the surrounding area, especially South Fork Wolf Creek and the portion of Empire Mine State Historic Park that the creek transects, a meadow known as the Bennett Street Grasslands. Since December 2016 I have run a year-round bird monitoring program in the Grasslands, performed with a permit from the Park and in conjunction with Bear Yuba Land Trust. The land trust holds a conservation easement on 7+ acres within the grasslands along South Fork Wolf Creek. At the grasslands we perform detection surveys and run a monitoring station where we operate 10 mistnets to passively capture wild birds, then band and release them. The grasslands are a rich, biodiverse ecotone that connects a conifer covered hillside, a riparian creek corridor, and a very wet meadow which drains from the hill where the Centennial site is located. At the Brunswick site, the project proposes to put its untreated wastewater into a vibrant pond, rich with birdlife. After treatment, the water will be discharged into the creek, which flows downstream though the grasslands where we run the monitoring program. The DEIR is inadequate in that is does not call out the Significant and Unavoidable Impacts that the proposed project would have to the birds and other wildlife that use South Fork Wolf Creek and its riparian habitat for breeding, foraging, and cover. Nor does it address the direct environmental or economic impacts that the mine activities would have on the monitoring program that GCAS runs.

1



Brunswick site pond

4.4 Biological Resources

Grp 13-2

The Idaho-Maryland Mine Project DEIR is deficient in that it does not it does not acknowledge nor address Significant and Unavoidable impacts to the 98 native bird species that my organization has captured or detected in the Grasslands, all of which are protected by the Migratory Bird Treaty Act. This list includes 4 rare, special status species including the critically endangered willow flycatcher. These species and their relevant statuses are listed below and can be found at this link from the State of California Natural Resources Agency Department of Fish and Wildlife:

***Empidonax traillii* willow flycatcher**
State rank: S1/S2: critically imperiled/imperiled in the state at subspecies level (State listing of the full species includes all subspecies.)
CESA (California Endangered Species Act): Endangered
USFS:Sensitive
USFWS: Bird of Conservation Concern

2

***Contopus cooperi* olive-sided flycatcher**
State rank: S3 vulnerable
CDFW:Species of Special Concern
IUCN:Near Threatened
NABCI:Yellow Watch List
USFWS:Bird of Conservation Concern

***Icteria virens* yellow-breasted chat**
State rank: S3 = Vulnerable
CDFW: Species of Special Concern

***Setophaga petechia* yellow warbler**
State rank: S3/S4 Vulnerable
CDFW:Species of Special Concern
USFWS:Bird of Conservation Concern

Grp 13-3

First, GCAS takes issue with the following statements from the DEIR:

Page 471 of the DEIR states "California black rail is the only special-status bird that was identified as potentially occurring on the Sites, though it is considered to have only a very low potential to occur. Common avian species having no special status are not at risk of populations declining below self-sustaining levels." In Appendix F.10, the Updated Technical Memorandum for the Idaho-Maryland Mine Project – South Fork Wolf Creek Discharge Biological Resources Assessment states "The habitat (aquatic and upland riparian zone) associated with the South Fork Wolf Creek does not provide suitable habitat for other CESA listed species such as the California black rail (*Laterallus jamaicensis coturiculus*)".

We disagree with these statements and believe that the pond area and adjacent meadow on the Brunswick property *could* in fact provide proper habitat for the California black rail. Moreover, the statement that "California black rail is the only special-status bird that was identified as potentially occurring" is absolutely incorrect--on at least 15 separate occasions GCAS has captured or detected one or more individuals of the above-mentioned special status species (yellow-breasted chat, yellow warbler, olive-sided flycatcher, and the critically endangered willow flycatcher). During four out of the past five years **we have captured more than 7 willow flycatchers** in the creek vegetation. In 2003 this

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species was estimated to have only 400 remaining breeding pairs! We can only imagine that this species is in greater jeopardy today, and for the DEIR to ignore its presence in this region is completely negligent.

Moreover, **the DEIR is deficient because it did not consider significant relevant facts known to the county:** in my NOP comment letter addressed to Matt Kelley, dated August 17, 2020, I listed 3 special status species we had encountered in the Bennett Street grasslands, including willow flycatcher, and on March 10, 2021, I also submitted to the county planning department a folder of all our CDFW California Natural Diversity Database (CNDDB) special status species submissions. On March 24, 2022 at the DEIR Public Hearing, an updated list of all CNDDB submissions and photographs of all 4 Special Status species was provided to the Commissioners and are included in this letter as well (see below).

Grp 13-4

The DEIR's biological surveys of the South Fork Wolf Creek riparian area were severely lacking, My understanding from Appendix F.10 is that the only biological survey that occurred in the South Fork Wolf Creek riparian area was a Visual Encounter Survey (VES) during which two people walked the creek on August 29, 2019. Not only is it likely that many amphibians were missed during this late, hot, dry time of year in a warming climate, but also, there is no evidence that any bird survey was attempted. If so, bird vocalizations are almost non-existent at that time of year and locally breeding migrants would have already departed.

In addition, a second meadow, located on the Brunswick property, also rich with birdlife, lies directly to the east of a vibrant pond where the project will pump its untreated wastewater. Using this pond as a wastewater dump is a tragic waste of a vibrant wetland, which is a rare asset in a very dry region in the midst of a multi-year drought. Studies must be required to determine if diverting water from this pond into a treatment facility could dry this meadow, and/or determine if contaminants in the wastewater can leach to this meadow. Also, a precise plan would need to be developed to protect wildlife from contaminated pond water. **It must also be stated that this meadow on the Brunswick property is dense with excellent willow habitat, and it is quite likely that the protected CESA willow flycatchers that we have caught in late summer may in fact breed at this location, and may be dispersing downstream towards the Bennett Street**

Grp 13-5

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Grp 13-5

Grasslands, using South Fork Wolf Creek as a migration corridor. Multi-year studies of these aspects of the project must be studied, addressed, and mitigated, but none of this is adequately addressed in the DEIR. It is of utmost importance that the county ensures that this willow habitat be viewed as a vital, protected wetland and should not be disturbed in any way by the project owner without adequate permitting. The "rebuilding" of the southwest pond berm suggested in the DEIR could have Significant and Unavoidable Impacts on birds and wildlife including the CESA willow flycatcher, the adjacent meadow, and rich, willow habitat of South Fork Wolf Creek. Two breeding wood duck pairs were recently (March 26, 2022) observed on the pond, as a testament to the importance of the habitat that this area provides.



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Meadow and extensive willow habitat available on Brunswick property

Grp 13-6

We find the statement "Common avian species having no special status are not at risk of populations declining below self-sustaining levels" (DEIR p 471) extremely disturbing. The landmark Rosenberg et al. 2019 peer-reviewed study published in the journal Science demonstrates a "cumulative loss of billions of breeding individuals across a wide range of species and habitats… and that declines are not restricted to rare and threatened species—those once considered common and wide-spread are also diminished." The study's results demonstrate that in my 50 year lifetime, we have lost 1/3 of the birds (in sheer volume) that existed in North America when I was born in 1971; a horrible tragedy. According to the 2019 State of the Birds Report produced by the North American Bird Conservation Initiative (NABCI), a consortium of governmental organizations and NGOs, "just 15 species of "common birds" (species that were once abundant, such as meadowlarks, juncos, blackbirds, and swallows) account for more than two-thirds of the total loss in native bird populations. Our common birds are now suffering population losses in the tens of millions— similar to the decline of the Passenger Pigeon." Even the dark-eyed junco, a 'common' backyard feeder bird, has had one of the steepest declines in North America. **So, the DEIR's**

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statement indicating that "common...species are not at risk of populations declining" is simply absurd, and the authors should be ashamed for even making this suggestion.

Grp 13-7

Section 4.4-4 The DEIR indicates in this section that no mitigation is required for a 'Less than Significant' Impact of "**Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites."** However, GCAS's data indicates that the SF Wolf Creek may be used regularly during migration season by the endangered Willow Flycatcher, Yellow-breasted Chats, and Yellow Warblers. Also, we have documented evidence that black bears use the Bennett Street Grasslands as a wildlife corridor and den nearby. We also have concerns that increased traffic between the meadow and the Centennial site, and between the grasslands and the Brunswick site could negatively impact bird and other wildlife moving between these areas.

Given that the Bennett Street Grasslands are located between the Centennial site and the Brunswick site, and across the street from a proposed housing development (see below), extensive additional studies need to be performed regarding the Significant and Unavoidable Impacts that the project will have on the grasslands and the riparian corridor. These should include but are not limited to general bird surveys; surveys of special status species; willow flycatcher surveys during breeding and migration periods; research on impacts of temperature change and flooding that the creek may have on invertebrates; and studies on the effects of flooding on ground nesting birds, of which there are numerous resident and migrant examples at the site. Additionally, we have documentation of birds, bobcats, bear, coyote, mountain lions and other wildlife moving freely between the grasslands and the area of the proposed housing development and the Centennial site, and additional studies must be performed to identify the Significant and Unavoidable Impacts that the additional traffic and noise created by the proposed housing development and the mine project would have on wildlife, their migration corridors, and the aesthetics of the grasslands of Empire Mine State Historic Park.

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Grp 13-8

4.4-2(a) Foothill yellow-legged frog According to https://animaldiversity.org/accounts/Rana_boylii/ "at lower elevations, foothill yellow-legged frogs breed from late March to early May, after the high-water stages of streams subside. At higher elevations, breeding usually takes place from June to August, after the ice and snow has melted from the high-mountain lakes..... Depending on the water temperature, the eggs may hatch within 5 to 37 days." This development is probably accelerated in warmer temperatures, and slowed in colder ones. Given our warming climate, it is likely that even at higher elevations the breeding period would have occurred earlier rather than later in the summer. In this case, even assuming the latest possible breeding date, which is unlikely given the drought of the past few years, warmer temperatures would have caused a short hatching period and egg masses could have easily been missed during the one survey performed August 29, 2019, and that this species is present nearby, so additional studies should be performed.

Grp 13-9

4.4-2(b) Western pond turtle On p 90 of the DIER states re: the western pond turtle *"If a nest is documented during pre-construction surveys, a non-disturbance buffer shall be established, as determined by a qualified biologist, based on the location of the nest until all eggs have hatched and the juveniles have dispersed out of the proposed impact area."* It is not clear to GCAS how any reasonable biologist could expect that juvenile turtles would or could disperse out of this area to the nearest pond, which is approximately 1,969.81 ft (600.40 m) away and across the busy Brunswick Road. This impact is Significant and Unavoidable.

Grp 13-10

4.4-2(f) More specifics should be provided regarding how and when roosting bats should be surveyed. Given the extensive period of disuse of the shaft tower, it is likely that the tower is used as a roosting or maternal roost site by a variety of bat species. Simply shutting the bats out of the tower when they depart to forage is UNETHICAL and should not be considered as a viable mitigation.

Grp 13-11

4-8 Hydrology and Water Quality

Ignoring the Significant and Unavoidable Impacts to South Fork Wolf Creek by alteration of temperature, water levels, and clarity, and the addition of toxins to South Fork Wolf Creek could **Result in Loss, Disturbance, or Degradation of**

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Jurisdictional Waters of the United States, and Waters of the State, Including Wetlands, which would not be acceptable under CEQA.

An extensive study of the hydrology of waters potentially entering the pond/wetland located immediately east of the Centennial site (south of the Ferguson Plumbing Supply buildings) should performed as this wetland is important to birds, frogs, and other wildlife. The DEIR provides no mention of any mitigation for impacts to surface or ground waters flowing into this wetland. Terrain maps would imply that this is the lowest elevation location in the area, so greater attention should be given to impacts to this pond/wetland.

Grp 13-12

4.4-3(c) The DEIR states: "To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. This is woefully inadequate. The language "to the extent feasible" allows too much leeway for the project sponsor to do the minimum necessary rather than actually care for the waterways and adjacent resources, vital resources .

The DEIR also must clarify a plan for placement of rock and rip rap along Wolf Creek and clarify how construction byproducts will be prevented from discharging into South Fork Wolf Creek, and specify how "dissipation" riprap will work at the point of entry into the creek.

Grp 13-13

The DIER indicates that a clay liner covered with geomembrane will line the pond, and that filtration through mined manganese dioxide, treated with sodium hypochlorite or potassium permanganate, and that sodium hydroxide will be used to treat NH3 in higher concentrations due to explosives. The presence of these chemicals could ultimately end up in the drinking water of the residents and water sources available to wildlife in untenable, whether allowed or unintentional. This Impact is Significant and Unavoidable and must not be allowed.

Grp 13-14

Aesthetics 4.1

4.1-1 The project inaccurately describes Impact 4.1-1 as Low Significance (LS) and requests a zoning variance to increase 4 separate buildings to a height of up to

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165, well above the currently zoned 45 foot limit. This would be a negative impact to the character of the region and a Significant and Unavoidable Impact to the trails of the adjacent state park, from which one can view the property.

Grp 13-15

4.1-3 We disagree that new sources of light are of Low Significance and could have Significant and Unavoidable Impacts to wildlife and the surrounding communities, potentially reducing home values and making the properties less desirable for those who wish to buy homes in the area.

4.10 Noise and Vibration

Grp 13-16

4.10-6 The DEIR indicates that no mitigation is required for a "Less Than Cumulatively Considerable" Impact of "Generation of a substantial permanent increase in ambient noise and/or vibration levels associated with the cumulative noise and vibration from all sources of the proposed project." However, GCAS disagrees with this, and is concerned that noise impacts could affect the fecundity (breeding success) of nesting birds. Knowledge of this impact can be found in many peer-reviewed scientific publications, too numerous to catalog here.

Rezoning

Grp 13-17

Due to the Significant Impacts proposed by the project, GCAS does not support the rezoning from **M1-SP to M1-ME of the Brunswick site.** "The proposed project includes the requested rezone of the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME)" (see DEIR Figure 4.9-3).

We also do not support the transfer of 46.27 acres at the Centennial site (p 54) to reconfigure property lines to resolve issue of proposed buildings crossing property boundaries.

Grp 13-18

Additional Considerations

The DEIR is also deficient in that it does not address the simultaneous impacts of a 300+ unit housing development currently under review by the city of

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Grass Valley, which is proposed on Bennett Road between the Centennial site and the grasslands at APNs: 009-560-005, 010, 031 – 039, by owner Timothy Snow and Millennium Engineering.

Also, in apparent violation of CEQA legislation, the IMM DEIR decouples the Centennial development from that of the Brunswick area and is written as if the Centennial developments are a "done deal." The Centennial site has numerous contaminants present and the site's development is sure to have Significant and Unavoidable Impacts on human and environmental health, and the Centennial and Brunswick site proposals must be considered in conjunction, as ONE project, and all negative Impacts considered simultaneously.

Grp 13-19

Numerous aspects of the IMM project require substantial environmental monitoring, such as long-term effects on Air and Water Quality and impacts to wells and the aquifer. The DEIR does not give sufficient consideration to who will be responsible for the extensive monitoring necessary for the 80-year life of the mine, and beyond. The monitoring of these impacts should not be left to the responsibility of the project sponsor, (for whom financial gain is the primary goal), nor to Nevada County, the City of Grass Valley, and its taxpayers. So, who will perform a sufficient level of monitoring that will keep our citizens and the environment healthy and who will pay for this Herculean task?

Grp 13-20

Gold Country Avian Studies agrees with the arguments put forth in comment letters submitted to the County by Empire Mine State Historic Park and CEA in opposition to aspects of the DEIR and supports the efforts and intentions of those organizations.

In summary, the Bennett Street grasslands are a biodiverse gem providing ideal habitat for resident and migratory birds. It is plentiful in food sources, as well as perennial water from South Fork Wolf Creek, which supports the invertebrates that birds feed to their young and consume during migration stopovers. Moreover, the grasslands are known to be the last remnant of the grassy valley after which Grass Valley acquired its name -- this site truly encompasses our community's heritage and serves as a rich environmental reservoir.

Grp 13-21

The true gold of our county are its stunning landscapes, its beautiful forests, its sparkling life-filled waters, and the diverse wildlife that populate these

habitats. It will be a sad day when this is sacrificed for the short-sighted gain of pulling ore from the ground.

Sincerely,



Allison Nelson, MS
Director, Gold Country Avian Studies

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Special Status Species Detected at Bennett Street Grasslands of Empire Mine Historical Park

yellow-breasted chat *Icteria virens*



Photo: GCAS

yellow warbler *Setophaga petechia*



Photo: GCAS

willow flycatcher *Empidonax traillii*



Photo: GCAS

olive-sided flycatcher *Contopus cooperi*



Photo: Cornell Lab of Ornithology

Gold Country Avian Studies

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NEL18F0004	4/4/2019	Contopus cooperi	olive-sided flycatcher	PDF	7/7/2018	Nevada	Grass Valley	ABPAE32010
NEL18F0003	4/4/2019	Icteria virens	yellow-breasted chat	PDF All Files(3)	9/4/2018	Nevada	Grass Valley	ABPBX24010
NEL18F0005	4/4/2019	Setophaga petechia	yellow warbler	PDF	9/25/2018	Nevada	Grass Valley	ABPBX03010
NEL19F0011	8/16/2020	Icteria virens	yellow-breasted chat	PDF	8/6/2019	Nevada	Grass Valley	ABPBX24010
NEL19F0014	8/16/2020	Empidonax traillii	willow flycatcher	PDF	8/6/2019	Nevada	Grass Valley	ABPAE33040
NEL19F0013	8/16/2020	Empidonax traillii	willow flycatcher	PDF	8/11/2019	Nevada	Grass Valley	ABPAE33040
NEL19F0012	8/16/2020	Empidonax traillii	willow flycatcher	PDF	8/25/2019	Nevada	Grass Valley	ABPAE33040
NEL20F0005	8/17/2020	Icteria virens	yellow-breasted chat	PDF All Files(3)	8/11/2020	Nevada	Grass Valley	ABPBX24010
NEL20F0006	8/17/2020	Empidonax traillii	willow flycatcher	PDF All Files(4)	8/11/2020	Nevada	Grass Valley	ABPAE33040
NEL20F0011	1/14/2021	Empidonax traillii	willow flycatcher	PDF All Files(10)	9/6/2020	Nevada	Grass Valley	ABPAE33040
NEL20F0012	1/14/2021	Setophaga petechia	yellow warbler	PDF All Files(4)	9/6/2020	Nevada	Grass Valley	ABPBX03010
NEL21F0005	3/2/2022	Icteria virens	yellow-breasted chat	PDF	7/1/2021	Nevada	Grass Valley	ABPBX24010
NEL21F0006	3/4/2022	Empidonax traillii	willow flycatcher	PDF	8/12/2021	Nevada	Grass Valley	ABPAE33040

GCAS CNDDB submissions as of 4/4/2022

Bennett Street Grasslands bird species detections

Species captured at Bennett Street Grasslands	Scientific Name
Acorn Woodpecker	*Melanerpes formicivorus*
American Robin	*Turdus migratorius*
Anna's Hummingbird	*Calypte anna*
Ash-throated Flycatcher	*Myiarchus cinerascens*
Audubon's Warbler	*Setophaga coronata auduboni*
Bewick's Wren	*Thryomanes bewickii*
Black Phoebe	*Sayornis nigricans*
Black-chinned Hummingbird	*Archilochus alexandri*
Black-headed Grosbeak	*Pheucticus melanocephalus*
Black-throated Gray Warbler	*Setophaga nigrescens*
Brown Creeper	*Certhia americana*
Bullock's Oriole	*Icterus bullockii*
Bushtit	*Psaltriparus minimus*
California Quail	*Callipepla californica*
California Scrub-jay	*Aphelocoma californica*
California Towhee	*Melozone crissalis*
Calliope Hummingbird	*Selasphorus calliope*
Cassin's Vireo	*Vireo cassinii*

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Cedar Waxwing	*Bombycilla cedrorum*
Chestnet-backed Chickadee	*Poecile rufescens*
Downy Woodpecker	*Dryobates pubescens*
Dusky Flycatcher	*Empidonax oberholseri*
Fox Sparrow	*Passerella iliaca*
Gambel's White-crowned Sparrow	*Zonotrichia leucophrys gambelii*
Golden-crowned Sparrow	*Zonotrichia atricapilla*
Gray Flycatcher	*Empidonax wrightii*
Hairy Woodpecker	*Dryobates villosus*
Hammond's Flycatcher	*Empidonax hammondii*
Hermit Thrush	*Catharus guttatus*
Hermit Warbler	*Setophaga occidentalis*
House Finch	*Haemorhous mexicanus*
House Wren	*Troglodytes aedon*
Hutton's Vireo	*Vireo huttoni*
Lesser Goldfinch	*Spinus psaltria*
Lincoln's Sparrow	*Melospiza lincolnii*
MacGillivray's Warbler	*Geothlypis tolmiei*
Northern Mockingbird	*Mimus polyglottos*
Nashville Warbler	*Leiothlypis ruficapilla*
Nuttall's Woodpecker	*Dryobates nuttallii*
Oak Titmouse	*Baeolophus inornatus*
Orange-crowned Warbler	*Oreothlypis celata*
Oregon Junco	*Junco hyemalis oreganus*
Pacific Wren	*Troglodytes pacificus*
Pine Siskin	*Spinus pinus*
Purple Finch	*Haemorhous purpureus*
Red-breasted Nuthatch	*Sitta canadensis*
Red-breasted Sapsucker	*Sphyrapicus ruber*
Ruby-crowned Kinglet	*Regulus calendula*
Rufous/Allen's hummingbird	*Selasphorus* hummingbird
Savannah Sparrow	*Passerculus sandwichensis*
Sharp-shinned Hawk	*Accipiter striatus*
Song Sparrow	*Melospiza melodia*
Spotted Towhee	*Pipilo maculatus*
Steller's Jay	*Cyanocitta stelleri*
Swainson's Thrush	*Catharus ustulatus*
Townsend's Warbler	*Setophaga townsendi*
Varied Thrush	*Ixoreus naevius*
Warbling Vireo	*Vireo gilvus*
Western Bluebird	*Sialia mexicana*
Western Flycatcher (likely Pacific-Slope)	*Empidonax difficilis*

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Western Tanager	*Piranga ludoviciana*
Western Wood Pewee	*Contopus sordidulus*
White-crowned Sparrow	*Zonotrichia leucophrys*
Willow Flycatcher	*Empidonax traillii*
Wilson's Warbler	*Cardellina pusilla*
Wrentit	*Chamaea fasciata*
Yellow Warbler	*Setophaga petechia*
Yellow-breasted Chat	*Icteria virens*

Species detected but not captured	**Scientific Name**
American Kestrel	*Falco sparverius*
Band-tailed Pigeon	*Patagioenas fasciata*
Belted Kingfisher	*Megaceryle alcyon*
Brown-headed Cowbird	*Molothrus ater*
Canada Goose	*Branta canadensis*
Common Raven	*Corvus corax*
Common Yellowthroat	*Geothlypis trichas*
Cooper's Hawk	*Accipiter cooperii*
European Starling	*Sturnus vulgaris*
Great Blue Heron	*Ardea herodias*
Great-horned Owl	*Spinus pinus*
Golden-crowned Kinglet	*Regulus satrapa*
Mourning Dove	*Zenaida macroura*
Northern Flicker	*Colaptes auratus*
Northern rough-winged Swallow	*Stelgidopteryx serripennis*
Olive-sided Flycatcher	*Contopus cooperi*
Pileated Woodpecker	*Dryocopus pileatus*
Red-tailed Hawk	*Buteo jamaicensis*
Red-tailed Hawk (dark morph)	*Buteo jamaicensis*
Rock Pigeon	*Columba livia*
Say's Phoebe	*Sayornis saya*
Townsend's Solitaire	*Myadestes townsendi*
Turkey Vulture	*Cathartes aura*
Virginia Rail	*Rallus limicola*
Western Meadowlark	*Sturnella neglecta*
White-breasted Nuthatch	*Sitta carolinensis*
Wood Duck	*Aix sponsa*

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GROUP LETTER 13: ALLISON NELSON, GOLD COUNTRY AVIAN STUDIES

Response to Comment Grp 13-1

This is an introductory comment expressing general concerns regarding the project and its associated DEIR. Please see responses to the following comments addressing the commenter's specific concerns.

Response to Comment Grp 13-2

The commenter generally states that the DEIR is deficient, and the project would directly affect the environment and associated wildlife. DEIR Chapter 4.4 analyzed potential impacts to special--status bird species, special-status bats, and non-special status birds protected by other laws (see Impact 4.4-2). Impacts were identified as potentially significant and required mitigation (e.g., preconstruction surveys) reducing these impacts to less than significant level. Please see Master Response 30 - Technical Study Adequacy and Master Response 37 - Birds and Raptors. Master Response 37 includes minor changes to Mitigation Measure 4.4-2(g) (e.g., pre-construction nesting bird surveys) to identify, by name, the riparian bird species identified by the commenter. In addition, Table 4.4-6 of Chapter 4.4, Biological Resources of the DEIR, is hereby revised as shown at the end of this letter to add descriptions of the bird species and evidence of their low potential for occurrence on the Centennial and Brunswick Industrial Sites. Similarly, page 4.4-39 of Chapter 4.4 is hereby revised as follows:

> Riparian Bird Species
>
> Several species of birds are known to forage and nest within riparian habitat along stream corridors, including the willow flycatcher (*Empidonax traillii*), yellow warbler (*Setophaga petechia*), yellow-breasted chat (*Icteria virens*), and olive-sided flycatcher (*Contopus cooperi*). Yellow-breasted chat has been mapped within the CNDDB approximately 1.0 mile downstream of the Brunswick Area within the riparian habitat along South Fork Willow Creek. The willow flycatcher, yellow warbler, and olive-sided flycatcher have not been mapped within the CNDDB within 5 miles of the Brunswick Area or Centennial Area, but unprocessed data regarding their potential occurrence within the same vicinity as the yellow-breasted chat along the South Fork Wolf Creek downstream of the Brunswick Area is included in the Grass Valley Quad CNDDB search (CDFW 2022).
>
> However, compared to the riparian habitat downstream of the Brunswick Area where the yellow-breasted chat has been mapped in the CNDDB (CDFW 2022), the riparian habitat within the Centennial and Brunswick Industrial Sites provide minimal suitable habitat for any of these species given the level of disturbance historically within those areas as well as the recent disturbance within both areas in 2021 related to a fire that burned a large area within the Centennial Area and a large storm in late December 2021 that heavily impacted the riparian habitat along the South Fork Wolf Creek within the Brunswick Area. The previous mapped location of the yellow-breasted chat, as well as the locations of the other three riparian bird species included as unprocessed data within the CNDDB (CDFW 2022), are within the Empire Mine State Historic Park and have been identified in an area of substantially higher stream and riparian habitat quality than the more highly disturbed riparian habitat located along the South Fork Wolf Creek within Brunswick Area. Accordingly, these species have a low probability of occurrence onsite, and no potential impact is expected.

The aforementioned revisions to Chapter 4.4. of the DEIR are provided for clarification purposes in response to public comment and do not affect the adequacy of the DEIR analysis, which already identified that the proposed project would result in a potentially significant impact to nesting

raptors and other migratory birds. As a result, the DEIR includes mitigation (MM 4.4-2(g)) requiring pre-construction nesting bird surveys, and if nesting birds are detected, implementation of avoidance measures.

Response to Comment Grp 13-3

Please see Response to Comment Grp 13-2.

Response to Comment Grp 13-4

Please see Response to Comment Grp 13-2, as well as Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 13-5

As noted in DEIR Chapter 4.4, and various biological appendices (Appendix F) the "pond" is a man-made clay-lined pond that was constructed to support previous industrial land uses and surrounded by wet meadow, montane hardwood-conifer, and developed vegetation types. These technical studies analyzed the species that would utilize these habitats and the DEIR included an impact analysis and mitigation measures if an impact was identified. Therefore, potential impacts to the man-made pond, onsite vegetation habitats, and potential special status species were thoroughly analyzed.

As stated on page 4.8-30 of the DEIR, the clay-lined pond, constructed in the 1980s, for the former Bohemia Lumbermill, was permitted by the RWQCB through WDRs as a Class II Designated Waste Management Unit, under former Title 23 of the CCR, Subchapter 15, Section 2532. According to the WDRs (Order No. 88-185 for Bohemia Incorporated Grass Valley Mill), the pond was to be lined with a two-foot-thick clay layer having a permeability not to exceed 1x 10-6 cm/s. Vector Engineering found that the “clay liner system was constructed in substantial accordance with the SWRCB Title 23, Subchapter 15, Section 2532 regarding construction of the natural liner system for Class II Designated Waste Management Units.” Mitigation Measure 4.8-1(a) requires the applicant to submit a RoWD and obtain a WDR for the use of the surface impoundment (i.e. Brunswick clay-lined pond. At a minimum, the liner of the clay-lined surface impoundment shall be upgraded to include a synthetic liner meeting the specifications in Title 27, Section 22490(f), of the California Code of Regulations. Due to the very low permeability of the existing and proposed liner, water contained in the pond does not infiltrate into the adjacent wetland meadow and therefore diverting water from the pond to the water treatment plant would not dry out the adjacent meadow and water in the pond cannot leach out into the adjacent meadow. As stated on page 4.4-85 of the DEIR, the project includes excavation and reconstruction of a segment of the berm of the existing clay-lined pond to remove pockets of sawdust not removed during prior construction. No disturbance to the wetland meadow is proposed and Mitigation Measure 4.4-3(b) requires the appliance to implement the Watercourse/Wetlands/Riparian Areas Management Plans prepared for the Centennial Industrial Site and Brunswick Area, as approved in their final form by Nevada County. Specifically, the applicant shall implement the mitigation measures and conditions identified in the Management Plans, which include measures designed to protect aquatic resources and the biological resources they support. Regarding, the Willow Flycatcher, please see Master Response 37 - Birds and Raptors.

As discussed in Master Response 30 - Biological Study Technical Adequacy, the project site (including the pond within the Brunswick Industrial Site) has been subject to extensive biological surveys, peer review, and analysis in the DEIR.



Response to Comment Grp 13-6

CEQA requires the analysis of impacts, directly or due to habitat modifications, to special-status species protected by CDFW or USFWS. In addition, CEQA requires an analysis of impacts to non-special status birds if they are protected by other laws and regulations (e.g., Migratory Bird Treaty Act). DEIR, Impact 4.4-2, conducted this analysis consistent with CEQA.

Response to Comment Grp 13-7

Please see Master Response 37 - Birds and Raptors, regarding potential impacts to the California black rail, willow flycatcher, olive-sided flycatcher, yellow-breasted chat, and yellow warbler.

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged, and analyzed in the DEIR impact analysis (see Section 4.4.4), that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities including preconstruction surveys and agency permitting. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it would be less than significant. The commenter does not raise any specific impact that would be caused by the project, but speculates that impacts could result. CEQA does not require analysis of speculative impacts. (CEQA Guidelines Section 15384.)

The commenter is concerned that increased traffic between the Bennett Street Grassland Meadow and the Centennial site and Brunswick site could negatively impact bird and other wildlife moving between these areas. Truck traffic from the proposed project is not on E. Bennett Road (see Figure 3.-13 of the DEIR) and traffic from operations along E. Bennett Road is limited to a portion of employees (approximately 12%) who may use that route to come to and from work at the Brunswick site (See figures 4.12-5 and 4.12-6 of the DEIR). As stated on page 4.4.74 of the DEIR, studies of the effects of noise on wildlife populations have shown that while some species can be negatively affected by traffic noise and wildlife densities are generally inversely proportional to distance from roadways, many species of wildlife are unaffected by roadway noise. In general, wildlife species have been shown to acclimate to the noise environment in which the species resides, or to select habitat based on a range of factors including the level of disturbance.

The project would not result in flooding and therefore would not have any impact to invertebrates or nests from flooding. Please see Chapter 4.8 of the DEIR and Master Response 36 - Flows in South Fork Wolf Creek. The project water discharge would be required to meet state water quality goals regarding temperature of discharged water. Please also see Master Response 32 – Temperature of Mine Water Discharge.

The commenter states that the DEIR must analyze how the project would affect the aesthetics of the grasslands of the Empire Mine State Historic Park. The project proposes no activities in the park that would have an aesthetic impact and no analysis is required.

Response to Comment Grp 13-8

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 13-9

As noted in Mitigation Measure 4.4-2(b), in addition to allowing an identified western pond turtle to move out of the way on its own, an option is also provided that a qualified wildlife biologist with a CDFW handling permit may move an individual out of the disturbance area. As a result, if a western pond turtle is identified during a preconstruction survey, they can safely exit the disturbance area either through their own movement or by a qualified biologist. As the adjacent South Fork Wolf Creek is habitat for western pond turtle, individuals of this species encountered around the pond could disperse from the pond to the creek.

Response to Comment Grp 13-10

Mitigation Measure 4.4-2(f) provides extensive detail regarding the survey of bats, specifically that surveys shall occur no more than seven days prior to surface disturbance, reporting requirements if bats are not found, passive removal if bats are identified, and avoidance until breeding roosts have dispersed. This mitigation measure allows for potential bats to be identified, prevented from returning to disturbance areas, and/or avoided to limit the potential for impact. As detailed in the revised mitigation measure, exclusion would not occur until all bats have vacated the roost (see Response to Comment AGCY 3-29). Most bats use different locations as day roosts every day, and passive exclusion is common practice, as it has little to no impact on bats, especially where there are numerous alternative roosts in the surrounding avoided forests.

Response to Comment Grp 13-11

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

The hydrology of waters entering the pond/wetland located east of the Centennial site has already been analyzed in the DEIR (See Chapter 4.8, Figure 4.8.3 and Appendix K.5 of the DEIR). Water currently flows from this offsite pond onto the Centennial site through a box culvert (see page 2 and page 7 of Appendix H.4) and would continue to flow through this offsite pond and onto the Centennial site (See figure H-2 of Appendix K.5). The project would not impact the pond/wetland located offsite to the east of the Centennial site and therefore further analysis is not required in the DEIR.

Response to Comment Grp 13-12

Mitigation Measure 4.4-3 requires additional state and federal permitting prior to the fill or any jurisdictional water. Negotiation with these agencies will determine avoidance, minimization, and compensatory mitigation requirements for project related disturbance. As stated in Mitigation Measure 4.4-3 “Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.”

The commenter asks that the DEIR clarify a plan for placement of rip rap along Wolf Creek and specify how dissipation rip rap will work at the point of entry into the creek. Additionally, the commenter asks how construction byproducts will be prevented from discharging into South Fork Wolf Creek. The placement of rip rap is discussed in Mitigation Measure 4.4-3(b). Regarding the prevention of construction byproducts from entering the creek, Mitigation Measure 4.6-2 requires that the mine operator obtain coverage under the Construction General Permit, and to prepare and implement a Storm Water Pollution Prevention Plan.

Response to Comment Grp 13-13

Groundwater will be pumped from underground workings to the existing 40-acre-foot, clay-lined settling pond. The existing pond does not have a discharge point and therefore untreated water would not flow to surface waters. As noted by the commenter, the existing pond is clay lined. As described in the DEIR project description (Chapter 3) and Impact 4.8-1, the existing pond's claying lining was constructed with a 2-foot clay layer, consistent with RWQCB regulations. In addition to this clay lining, the applicant is proposing to install a synthetic liner that will be required to meet RWQCB regulation (required by Mitigation Measure 4.8-1(a)). The existing clay liner, combined with the synthetic liner, will prevent leaching of untreated water into the groundwater.

Please see Master Response 35 - Discharge to South Wolf Creek, for a detailed description of the water treatment system and eventual discharge of treated water into South Fork Wolf Creek.

Response to Comment Grp 13-14

As stated in Impact 4.-1, the County General Plan does not identify any scenic vistas in the vicinity of the project site. Impact 4.1-2, analyzing visual impacts from surrounding vantage points, concluded this impact was significant and unavoidable due to a change in views from these public vantage points.

Response to Comment Grp 13-15

The commenter states that they disagree with the significance conclusion regarding new sources of light. This impact was addressed in Impact 4.1-3 of the DEIR and found to be less than significant. As stated therein (page 4.1-24),

> The Brunswick Industrial Site is anticipated to include approximately 41 pole-mounted LED lights throughout the operational area, including the parking lot, building complex, and internal roads (see Figure 3-13 of Chapter 3, Project Description, which depicts the proposed exterior lighting plan for the Brunswick Industrial Site). The mounting height for the LED lights would be 20 feet. The 41 pole-mounted lights would be Gardco (by Signify) LED lights, which are "dark sky approved" by the International Dark Sky Association (IDA).[4] IDA's Fixture Seal of Approval Program certifies outdoor lighting fixtures as being Dark Sky Friendly, meaning that they minimize glare while reducing light trespass and skyglow. All products approved in the program are required to be fully shielded and to minimize the amount of blue light in the nighttime environment.

The above statement, in addition to the more extensive analysis contained in Impact 4.1-3, provides substantial evidence that the project's lighting effects would be less than significant.

Please see Master Response 1 - Non-EIR/ Administrative Issues, and Master Response 2 - Social and Economic Issues regarding impacts to property values. Comment noted.

Response to Comment Grp 13-16

Noise impacts to wildlife and bird species was analyzed in Impact 4.4-2 of Chapter 4.4, Biological Resources, and determined to be less than significant.

Response to Comment Grp 13-17

Comment noted. Please see Master Response 1.

[4] International Dark Sky Association: Dark Sky Approved Lighting. Available at: https://www.darksky.org/our-work/lighting/lighting-for-industry/fsa/fsa-products/#!/EcoForm-LED-site-and-area-G2-small-ECF-S/p/133073023/ category=34046011. Accessed August 20, 2021.

Response to Comment Grp 13-18

The commenter asserts that the DEIR is not adequate because it does not address the simultaneous impacts of a 300+ unit housing development under review by Grass Valley. A conceptual review of the mixed-use housing project located at 10662 East Bennett Road by the City of Grass Valley on October 12, 2021, was conducted after the Notice of Preparation for the Idaho-Maryland Mine project.

https://nevco.granicus.com/DocumentViewer.php?file=nevco_30c8ac8bef88b0269a248327f380cbfe.pdf&view=1

However, based on the City's online application tracking platform, no formal application has been submitted for the referenced conceptual project, so analysis of associated impacts would be mere speculation. CEQA does not require analysis of speculative impacts. (CEQA Guidelines Section 15384.)[5]

Response to Comment Grp 13-19

Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 13-20

As a required pursuant to CEQA, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County.

Response to Comment Grp 13-21

Comment noted. Please see Responses to Comments to Agency Letter AGCY 1 and Group Letters Grp 7 and Grp 8.

Response to Comment Grp 13-22

Comment noted.

[5] https://aca-prod.accela.com/GRASSVALLEY/Cap/CapHome.aspx?module=Planning&TabName=Planning&TabList=Home%7C0%7CBuilding%7C1%7CPlanning%7C2%7CCurrentTabIndex%7C2

Olive-sided flycatcher *Contopus cooperi*	--/SSC	Breeds in montane and northern coniferous forests, at forest edges and openings, such as meadows and ponds. Winters at forest edges and clearings where tall trees or snags are present. The nest is an open cup of twigs, rootlets, and lichens, placed out near tip of horizontal branch of a tree.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable habitat for the species.
Willow flycatcher *Empidonax traillii*	--/CE	Willow flycatcher males arrive first to the breeding grounds and establish territories. Males establish territories by singing on high perches. Females arrive later and settle onto a territory held by a male. Inhabits extensive thickets of low, dense willows on edge of wet meadows, ponds, or backwaters. Low, exposed branches are used for singing posts and hunting perches.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable foraging habitat for the species. Suitable nesting habitat absent. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species along South Fork Wolf Creek adjacent to open wet meadows. No impacts to riparian habitat are proposed.
Yellow-breasted chat *Icteria virens*	--/SSC	Summer resident and inhabits riparian thickets of willow and other brushy tangles near waterways. Nests in low, dense riparian habitat consisting of willow and blackberry as well as wild grape. Tends to nest within 10 feet of the ground.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species.
Yellow warbler *Setophaga petechia*	--/SSC	Occurs principally as a migrant and summer resident from late March through early October; breeds from April to late July. Inhabits riparian thickets of willow and other brushy tangles near waterways. Nests in dense riparian habitat consisting of willow and cottonwood.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species.

Group Letter 14

Nevada City Rancheria Tribal Council P.O. Box 2624 Nevada City, Ca. 95959
530-265-6563 (Chairman) 530-570-0846 (Secretary)

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: March 28, 2022

RE: Formal Request for Tribal Consultation Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code section 21080.3.1, subds. (b), (d) and (e) for Idaho-Maryland Mine by Rise Gold Corporation, Grass Valley, Nevada County, California

Dear Commissioners Milman, Duncan, Ingram, Mastrodonato, and Greeno:

This letter constitutes a formal request for tribal consultation under California law, including the provisions of the California Environmental Quality Act ("CEQA") (Cal. Public Resources Code section 21080.3.1 subdivisions (b), (d) and (e)) for the mitigation of potential project impacts to tribal cultural resource for the above referenced project. The Nevada City Rancheria Nisenan Tribe ("Tribe") hereby requests notice and information for the above referenced project, which is within the Tribe's territory, which includes the Nevada County Planning Commission's geographical jurisdiction. The Nevada City Rancheria Nisenan Tribe is a California Native American Tribe as defined by Cal. Public Resources Code section 21073, whose ancestral territory includes, specifically, the lands affected by the proposed project.

Grp 14-1

The Tribe has significant interests in the proposed Project including, without limitation Tribal Cultural Resources as defined by California Public Resources Code § 21074 ("Tribal cultural resources"), traditional ecological knowledge, and the current badges and intendants of the genocide of our people caused by gold mining in this area. Therefore, the Tribe requests consultation on topics that are to be included in consultation if requested pursuant to Cal. Public Resources Code section 21080.3.2, subd. (a), including without limitation alternatives to the project, recommended mitigation measures, significant effects of the project.

The Tribe also requests consultation regarding the discretionary topics pursuant to Cal. Public Resources Code section 21080.3.2, subd. (a), including without limitation the type of environmental review necessary, significance of tribal cultural resources, including any regulations, policies or standards used by your agency to determine significance of tribal cultural resources, significance of the project's impacts on tribal cultural resources, project alternatives

Chairman: Richard Johnson Vice Chair: Virginia Covert Secretary: Shelly Covert
Treasurer: Lorena Davis Alt: Sarah Thomas Mal: Saxon Thomas

and/or appropriate measures for preservation or mitigation that we may recommend, including, but not limited to:

(1) Avoidance and preservation of the resources in place, pursuant to Public Resources Code section 21084.3, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
(2) Treating the resources with culturally appropriate dignity considering the tribal cultural values and meaning of the resources, including but not limited to the following: (a) protecting the cultural character and integrity of the resource; (b) protection the traditional use of the resource; and (c) protecting the confidentiality of the resource;
(3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and
(4) Protecting the resource.

Grp 14-2

The Tribe also notes that the Draft EIR states that the Tribe did not respond within 30 days of notification of an offer to consult. See DEIR p. 4.5-21. Please be advised that the Tribe received notice on March 21, 2022, that the California Native American Heritage Commission finally determined that the Tribe "has provided sufficient documentation to the NAHC to be added to the NAHC's Contact/Tribal Consultation list." This notice comes approximately seven years after the Tribe first requested that the NAHC include the Tribe on its consultation list. Thus, it is only this week that the Tribe understood that it finally has achieved the protections of California law, including Tribal consultation mandates and consideration of Tribal cultural resources in the CEQA review process.

Grp 14-3

Moreover, given the history of genocide to our people caused by gold mining in this area, and because of the illegal termination of the Tribe's federal recognition, the Tribe's capacity to respond to such offers is necessarily limited to those matters that appear of genuine concern. Given the ongoing harm that gold mining caused to the Tribe and its members, the Tribe never thought the proposed project could possibly proceed to the point of seriously being considered by the Commission and the County. This is particularly true considering the County's Resolution No. 20-533 "recognizing the Nevada City Rancheria Nisenan Tribe's historical, cultural and continued significance to Nevada County and California …." Id. Thus, the Tribe requests consultation under this County law as well. See https://www.counties.org/general-information/county-structure-0 ("As the legislative body of the county, the Board of Supervisors may act by resolution ..."). The County recognizes that the discovery of gold here led to "the displacement of the Tribe and its members." Id. The County also acknowledges the "Tribe's continuous existence as an indigenous tribe in Nevada County, and further recognizes the Tribe's historical, cultural and continued significance to Nevada County and California." The County also "supports future collaboration and agreement between the County and the Tribe that strengthen each of their governments, for their mutual benefit and to ensure that local land use impacts on tribal and county governments, including their citizenry, services,

lands, and infrastructure, are maintained and mitigated for the benefit of all." Id. The Tribe therefore respectfully requests that the Commission, as a County agency, honor the County's Resolution by consulting with the Tribe regarding the proposed project as a matter of County law and policy, in addition to and distinct from CEQA and other applicable law.

The Tribe therefore requests consultation within 30 days of your receipt of this letter. Please contact me to arrange a convenient date and time to initiate the consultation process.

Sincerely,

Shelly Covert, Tribal Secretary
Nevada City Rancheria Nisenan Tribe
Shelly@NevadaCityRancheria.org

cc: Christina Snider, Executive Secretary, NAHC & Office of the Governor, Tribal Advisor
Debbie Pilas-Treadway, Chief Deputy Executive Secretary, NAHC
Alison Lehman, Executive Officer, Nevada County
Jeff Thorsby, Senior Management Analyst, Nevada County
Frank Lawrence, Esq.

GROUP LETTER 14: SHELLY COVERT, NEVADA CITY RANCHERIA NISENAN TRIBE

Response to Comment Grp 14-1

The commenter notes that the letter constitutes a formal request for tribal consultation under California law, including the provisions of CEQA Section 21080.3.1. Please see Response to Comment Grp 14-2.

Response to Comment Grp 14-2

California Public Resources Code Section 21080.3.1(d), requires formal notice to California Native American Tribes, as stated below:

> *Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.*

The County complied with the above requirement, despite the fact that the Nevada City Rancheria Nisenan Tribe was not added to the Native American Heritage Commission Contact/Tribal Consultation list until March 21, 2022.

As stated in the Cultural Resources Section of the EIR, "On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, **Nevada City Rancheria Nisenan Tribe**, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and **Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period**." (DEIR p. 4.5-21, emphasis added.) Additionally, the Project Proponent's cultural resource consultant, InContext, attempted to contact the Tribe on December 1, 2020 by letter, phone and email, and on December 16, 2022 by phone and email, with no response. The correspondence was addressed and sent directly to Shelly Covert, the author of Letter 14.

As such, the County considers the March 28, 2022 letter as a CEQA comment letter, but does not have legal authority to start a late consultation process under California Public Resources Code Section 21080.3.1 because the request for consultation was not received within 30 days of the notice.

Response to Comment Grp 14-3

The commenter cites to County Resolution No. 20-533, recognizing the Tribe's history, culture and significance to Nevada County and California, and again requests late consultation under the County Resolution.

The County agrees that consultation is required if a request is received within 30 days of receipt of formal notice; however, the Public Resources Code does not otherwise allow a lead agency to engage in formal consultation under CEQA if notice is not received within that 30-day timeframe. See the relevant language from California Public Resources Code Section 21080.3.1(b) below:

> *Prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe,* ***and*** *(2)* ***the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation****.*

Importantly, the California Public Resources Code does not grant the County, as lead agency, authority for formal consultation based on requests received outside of the 30-day window. (See California Public Resources Code Section 21080.3.1 - 21080.3.2.) The commenter appears to argue that either the California Native American Heritage Commission's recent position change that the Tribe is eligible to receive notices, or that County Resolution No. 20-533 somehow allow a late consultation request to be made; however, California law does not provide any mechanism for official consultation based on untimely requests from newly notice-eligible tribes; and as stated above, the Nisenan Tribe actually did receive repeated notice from both the County and the Project Proponent's consultant, and did not contact the County. As such, the County cannot lawfully initiate a late formal AB52 consultation process based on the March 28, 2022 letter.

In addition, as noted on page 4.5-32 of Chapter 4.5 of the DEIR,

> The UAIC responded on December 18, 2019, and requested consultation and copies of the Cultural Impact Report, technical reports, requests for and results of records searches, and GIS SHP files. The County provided such information. In addition, the UAIC noted that they are not aware of any Native American archaeological sites in or near the project site.

Nevertheless, the County concluded that project impacts to tribal cultural resources could be potentially significant, but reduced to less than significant through imposition of mitigation measures (cf. MM 4.5-2 and 4.5-3).

Group Letter 15

NEVADA COUNTY ASSOCIATION OF REALTORS®
REALTOR®
"Committed to a Higher Standard"

April 4, 2022

County Planning Commission
County of Nevada
950 Maidu
Nevada City, CA 95959

RE: Comments on Draft Environmental Impact Report (EIR19-0001), prepared by the Idaho-Maryland Mine Project.

Nevada County Planning Commission
Danny Milman, District 1
Laura Duncan, District II
Robert Ingram, District III
Mike Mastrodonato, District IV
William Greeno, District V

Grp 15-1 Thank you for allowing us to speak before you on March 24th during Public Comments to address public comments on the Draft Environmental Impact Report. As stated, we reviewed the document and have the following concerns and questions:

- **Water –**
  - **Grp 15-2** The EIR does not sufficiently clarify remediation for homes in Brunswick/Bennett region that are on wells yet not included in the limited number of residences that will receive new access to treated water hook-ups
  - The report does not adequately address the drilling's impact on the water table and requirement for well modifications as well as fiscal impact to reach the new water table depths over the eighty (80) year mining period with 3.6 million gallons of water per day during de-watering and 1.2 million gallons per day during remaining mining over eighty-year period.
  - **Grp 15-3** The study does not sufficiently address the impact on the water table and potential for resulting ground movement.
  - **Grp 15-4** Report states that the mine will be a net water producer yet does not clarify the recipients. Will Nevada County have potential to recapture those waters?
  - **Grp 15-5** Minimal study of required erosion and subsidence remediation due to extensive increase of waterflow down Wolfe Creek.
  - **Grp 15-6** Question of whether a bond will be posted for the additional hook-ups to replace wells that may need to be addressed following re-opening.

■ 336 Crown Point Circle, Grass Valley, CA 95945 ■ Phone 530 272-2627 ■ Fax: 530 272-2646 ■ Email nevadacountyaor.com ■

Grp 15-7

- **Traffic**
  - Insufficient study on the impact of traffic along Brunswick and adjacent roadways with 300 employees commuting into and out of the workplace and one hundred (100) truck load transported each day during a twelve-hour (7am-7pm day).
  - Requesting clarification on traffic regulation at Brunswick/Whispering Pines (Absence of light signal) posing a safety issue with semi-truck crossing traffic every eight (8) minutes. Further, no requirement for signal at Idaho Maryland/Centennial which commuters may use as an alternate egress from business park due to traffic on Whispering Pines/Brunswick intersection.
  - With current traffic congestion posing access issues, how will this project affect emergency access to the public and emergency services?

Grp 15-8

- **Habitat and Contaminants**
  - The Centennial site requires remediation of contaminants. Report does not address removal and extent of rock refining and levels of contaminants in the tailings being disposed at the Centennial site, rain runoff on the adjacent waterway and resulting impact on lakes and communities downstream.

Grp 15-9

- What determined the amount set for the restoration bond and is it adequate to accommodate future site restoration to a natural, healthy state? The report does not address specific restoration levels required.

Grp 15-10

- **Noise**
  - Insufficient study of noise levels created with project – 24- hour operation
    - Noise from trucks and machinery loading and unloading tailings
    - Truck noise on Brunswick and adjacent roadways
    - Insufficient data as study reflects noise decibel levels lower than results of ambient noise from Brunswick in adjacent neighborhoods prior to the Idaho Maryland Mine re-opening.

Grp 15-11

- **Electricity/alternate Power**
  - The County is calling for a decrease in electricity usage. The report does not address electricity consumption and ability to work within the reduced guidelines or impact of alternative energy on noise levels.

Grp 15-12

Housing and workforce supply are not topics addressed in the Environmental Impact Report, yet the Association of REALTORS encourages the County to ensure that they are included under further study in the Economic Impact Report. We thank you for hearing our request for further information.

Sincerely,

Kathleen Hinman

Kathleen Hinman, RCE
The Nevada County Association of REALTORS

GROUP LETTER 15: KATHLEEN HINMAN, NEVADA COUNTY ASSOCIATION OF REALTORS

Response to Comment Grp 15-1
The comment is introductory and does not address the adequacy of the DEIR. Please see the below responses to comments.

Response to Comment Grp 15-2
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Grp 15-3
The commenter's reference to ground movement is somewhat unclear but appears to concern subsidence due to groundwater pumping. Please refer to Master Response 29 – Near Surface Workings and Subsidence.

Response to Comment Grp 15-4
As stated on page 2 of the Water Supply Assessment for the project (Appendix N), the projected potable and non-potable water demand for building of the proposed project totals approximately 121 acre-feet per year. The project is expected to be a net producer of water through its discharge of approximately 1,371 acre-feet per year of treated mine water to the South Fork of Wolf Creek. The Nevada Irrigation District (NID) could adjust its flows upstream to use the extra water available downstream if it desired to. Customers of such water would be within the purview of NID.

Response to Comment Grp 15-5
Please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Grp 15-6
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 15-7
The commenter asserts that the DEIR inadequately studies traffic effects along Brunswick Road with 300 employees and 100 trucks. This is incorrect. As can be seen in Table 4.12-8 of the DEIR, Project Trip Generation, the project traffic analysis considered the traffic effects of employee and haul truck trips on the surrounding roadways, including Brunswick Road (i.e., Brunswick is study roadway segment). Other study roadways include E. Bennett Road and SR 174.

As indicated in Tables 4.12-10 and 4.12-11 of Chapter 4.12, the Brunswick Road/Whispering Pines Lane intersection would operate acceptable with the addition of project traffic.

Regarding the Idaho-Maryland/Centennial Drive intersection, page 4.12-66 of the DEIR states the following:

> Signalization will improve the Idaho-Maryland/Centennial Drive intersection to LOS D. This intersection is identified to be signalized in the City of Grass Valley

> GVTIF. Under EPAP Plus Project (Scenario #1), the project is expected to add 18 additional vehicles through the intersection during the 3:30 to 4:30 PM time period, and under EPAP Plus Project (Scenario #2), the project would add 15 additional vehicles. Mitigation Measure 4.12-1(b) requires the applicant to pay the GVTIF to the City of Grass Valley, given that the needed intersection improvement is included in the City's TIF. Thus, payment of the GVTIF would reduce the impact to a *less-than-significant* level.

Potential project effects on emergency access is addressed in Chapter 4.13, Wildfire. Please also see Master Responses 4 and 5.

Response to Comment Grp 15-8

Regarding cleanup of the Centennial Industrial Site, please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Regarding water quality effects of engineered fill placement at the Centennial Industrial Site, please see Master Response 8 – Mine Waste Characterization.

Response to Comment Grp 15-9

The comment is somewhat unclear but the following response is offered. A final assurance cost estimate will be required annually pursuant to SMARA and the County Code that will estimate the cost of reclamation based on existing surface disturbance. Once concurrence with this estimate is received from the County and Department of Conservation, Division of Mine Reclamation, the application will be required to post a financial assurance mechanism (FAM) in the estimated amount.

Response to Comment Grp 15-10

Regarding the commenter's noise concerns, please see Response to Comment Grp 21-129 through 21-131.

Response to Comment Grp 15-11

Energy is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. The reference to "reduced guidelines" is unclear. Nevertheless, in an attempt to provide information that may be helpful, please see Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Grp 15-12

The commenter's concerns related to housing and workforce supply are outside the scope of CEQA, but noted for the record. Please see Master Response 1.

Group Letter 16

March 23, 2022

Nevada County Planning Department
Mr. Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
(530) 265-1423

Dear Mr. Kelley,

On behalf of the volunteer members of the Nevada County Chapter of Citizens' Climate Lobby/Education (CCL), please accept our comments to the Draft Environmental Impact Report (DEIR) for the Rise Gold Mine Project.

Grp 16-1

Our volunteer membership seeks to inform community members about ways to address climate change. Given the enormous amount of Greenhouse Gas emissions that could be produced by the Rise Gold Mine Project, the members authorized our submission of comments to the DEIR. You will find our comments in the separate 11-page document enclosed.

Thank you for your assistance to the Board of Supervisors and the Planning Commission of Nevada County. Your public service is an invaluable asset to the citizens of Nevada County.

Best Regards,

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Comments to the Idaho-Maryland Mine Project SCH# 2020070378
Draft Environmental Impact Report, Volume I-X Chapters 1-8
Prepared for Nevada County, December 2021

Draft DEIR Comments submitted by David J. Whitehead, PE, 100 Bawden Ave, Grass Valley CA 95045

Table 2.1 Page 2-23

Grp 16-2

The Summary of Impacts and Mitigation Measures, Item 4.3-7(b) states " Rise shall retire carbon offsets equaling 2,664 MT CO2e, which was calculated by subtracting 1,100 MT CO2e (threshold) from the construction emissions generated by the project." However, in Table 4.3-23, the Total Annual Emissions (GHGs) generated during construction is calculated to be 3,444.55 MT CO2e. Subtracting the proposed threshold of 1100 MT CO2e from that figure would result in 2,344.55 MT CO2e, not 2664 MT CO2e. The value in Table 2.1 is approximately 320 MT CO2e greater than the value shown Table 4.3-23. It is not clear what accounts for this discrepancy, but it is noteworthy that the estimated values in the tables are presented as having a high degree of precision that is probably not justified by the underlying quality of the data.

Grp 16-3

In the section titled "Method of Analysis" (page 4.3-44), it is stated that using a construction start date of January 2021 "provides a conservative approach to the emissions analysis…because the existing regulations will ensure that emissions from construction equipment and vehicles during future years will be less intense than identical activities undertaken at the present time. Likewise, …if the same construction activities were to be spread over a longer period (i.e., a period in excess of 12 months), the amount of overlap of equipment usage would be reduced, which would result in reduced max daily and annual emissions." This statement reveals a misunderstanding of the cumulative nature of GHG emissions that underlies the discussion of GHGs. In an effort to portray their GHG emissions as less than significant in relation to the local air management district's significance criterion of 1,100 tons per year, Rise has presented their emissions estimates as though the date the project begins, or the schedule of construction and operation, make any difference. In fact, GHG emissions are unlike other pollutant emissions where concentration or intensity over time may have meaning. GHG emissions do not depend on a dose:effect relationship.

The effects of GHG emissions from the project will not be felt locally; they will impact the entire world. All of the sources of emissions around the world contribute to global warming and to other serious threats to life on Earth. Any GHG emissions above zero are potentially significant because carbon dioxide accumulates for many years in the atmosphere, incrementally contributing to global warming. If GHG emissions only warmed the atmosphere of Nevada County, then the approach taken in the DEIR would make sense. But that is not how GHG emissions affect the environment. Just as Nevada County will experience rising temperatures, weather extremes, threats to forest health, increased threats from wildfires, and changes in plant and animal populations in coming years because of the cumulative effects of GHG emissions from the multitude of sources that have been contributing to global warming over many decades, so the GHG emissions from the proposed project will contribute to the continuing threat of global warming for the life of the project. It does not matter that these emissions occur in January or

June, or that they occur over one year or two years, or that they are due to construction or operation, or even that they occur in Nevada County instead of Los Angeles County. What matters is the total amount of additional emissions that will occur and the amount of time that the carbon dioxide remains in the atmosphere.

Grp 16-4

The residence time of CO2 in the atmosphere, by the way, is between 300 and 1,000 years, much longer than the 80 year estimated life of the project. Carbon dioxide is removed from the atmosphere relatively slowly, by plant respiration, solution in sea water, by interaction with certain minerals, and by dissipation into space. Absorption of CO2 by seawater presents an additional existential threat to life on Earth because it results in acidification of sea water, and interferes with removal of CO2 by algae, and the growth of organisms that rely on calcium carbonate. Global warming is not the only global threat posed by continued increases in GHG emissions. Ocean acidification may be an even greater concern than global warming, but both are caused by the continued burning of fossil fuels. That is why Californians have decided to work so hard at finding ways to reduce their emissions of GHGs. It is not that California alone will benefit from these reductions. It is because Californians have decided to chip in and do their share to lead the nation in reducing their emissions, to find new ways to remove carbon dioxide from the atmosphere, and to help persuade the rest of the world to follow our lead. The DEIR alludes to the fact that vehicle emissions standards are expected to become more stringent in future years. Unfortunately, the preparers of the DEIR see this as a reason why they should not be concerned about their own emissions, instead of seeing it as a clear indication that their emissions will be an increasing concern.

In failing to recognize and treat GHG emissions seriously, the discussion of GHG emissions in the DEIR fails its most basic purpose, which is to correctly identify the environmental impacts of the project and to identify and evaluate appropriate mitigation measures to address these impacts. Whether or not the emissions from the project may be considered justified given the possible benefits of the project, the DEIR is inadequate for not properly identifying the impacts of GHG emissions that will result from the project, and for not presenting a full range of feasible measures to mitigate those impacts.

Grp 16-5

Needless to say, the preparers of the DEIR should review their calculations of GHG emissions and correct any additional errors. Further, the DEIR should present estimated values with an appropriate level of precision (a value of 2,344.55 MT CO2e may look accurate, but in reality, it may only be accurate to one or two significant figures). Such estimates would be more honestly presented along with some discussion of the sources and magnitudes of uncertainty in the estimates. The estimates should not focus on precise estimates of the fuel efficiency of the trucks to be used in the project, but on the uncertainty in the number of miles, number of vehicles, origination locations of the trucks, effects of weather conditions on the estimates, and perhaps most important, whether some items that have carbon footprints have been ignored in the analysis.

Grp 16-6

This project relies on materials that themselves have carbon footprints that will potentially impact the total GHG emissions of the project. These include, but are not limited to building materials, including concrete, steel, and paving materials. While the DEIR quibbles over the technicality of whether they will exceed an Air Management District significance threshold, presenting their estimates as accurate to six significant figures, they have entirely forgotten the cost in GHG emissions of producing the building materials needed for the project.

Chapter 4.3 Page 4.3-43

After a brief discussion of established GHG emission thresholds in adjacent Air Quality Management Districts, and noting that Nevada County has not established any thresholds for such emissions, the DEIR makes the following statement:

"For a conservative evaluation, the SMAQMD 1,100 MT CO2e per year construction GHG threshold has been applied to project construction. For operations, because the project is an industrial project that includes stationary sources (i.e., diesel generators used for emergency power), the project's GHG emissions were compared to the 10,000 MT CO2e per year quantitative threshold, which, as described above, is used by SMAQMD, PCAPCD, BAAQMD, and SCAQMD for industrial and/or stationary source emissions of GHGs. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 MT CO2e per year threshold in numerous CEQA documents where those air districts are the lead agency."

Grp 16-7

The DEIR claims that the consultant has made a "conservative evaluation", and yet has omitted GHG estimates for the production of concrete, paving asphalt, steel, and other building materials to be used in the construction period. These omissions result in an incomplete and unscientific calculation of GHG production, and indicate that the consultant has set a goal for its analysis to stay below the identified thresholds, rather than take a truly scientific and conservative approach to estimating GHG production of the project, letting "the chips fall as they may." The result is an incomplete description of the project to the public. The consultant should recalculate GHG production for the entire project scope, with the purpose of including all sources of GHG production for the project, both direct and indirect.

The proposal to utilize thresholds of other air districts in California does not necessarily mean that, should Nevada County decide to accept this approach, Nevada County will satisfy its duty to the public to thoroughly evaluate harmful environmental impacts and determine their significance. In fact, as Lead Agency, Nevada County may, and should, require that the DEIR make a more thorough analysis of GHG emission impacts. We recommend that Nevada County take an approach that recognizes the ever-increasing threats of climate change and GHG emission contributions to climate change, in view of the State of California's goals to address climate change impacts.

Grp 16-8

Among these goals is that California should achieve carbon neutrality by 2045 (Executive Order B-55-18). The DEIR correctly mentions that EO B-55-18 calls for CARB to work with relevant state agencies to ensure that future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal, but fails to mention that the next (five year) update of the Scoping Plan is due to be completed in 2022. The general direction of State policy in California has been to set more ambitious climate targets, and to achieve them earlier. Hence, for example, EO N-79-20 sets a goal to end sales of internal combustion passenger vehicles by 2035, as part of the goal to achieve carbon neutrality by 2045. In fact, the FAQ accompanying EO N-79-20 states that "separate rulemaking process and incentives will be needed to address other targets in the Executive Order. This includes more stringent standards for medium- and heavy-duty trucks, and reduced emissions from fossil fuel and electricity production." (https://ww2.arb.ca.gov/resources/fact-sheets/governor-newsoms-zero-emission-2035-executive-order-n-79-20). The DEIR should discuss this direction and, if possible, any foreseeable changes in State policy that may impact the project. While the DEIR mentions that passenger vehicle emission standards will

become more stringent, one of the implications of this change is that stationary and mobile GHG source emissions will need to be reduced. After all, the purpose of making vehicle emissions standards more stringent is not simply to reduce emissions from each source, but to reduce total emissions.

Furthermore, the DEIR proposes to mitigate only the GHG emissions that surpass the thresholds. This approach is not "conservative" at all. If the calculations reveal that the project will surpass the thresholds, then the project is a significant source and all GHG emissions should be mitigated.

Chapter 4.3 Page 4.3-92

The Rise Grass Valley Inc. proposal to mitigate project generated GHG emissions addresses construction emissions only. The proposal does not mitigate operational GHG emissions, nor indirectly caused GHG emissions generated by second-tier activities (i.e. purchase of concrete, paving asphalt, etc.) Furthermore, the DEIR does not estimate total CO2e emitted by the proposed project over its lifetime, which as discussed above, represents the actual cumulative impact of the emissions from the project since CO2 emissions from the project are expected to remain in the atmosphere for more than 300 years. Below is the calculation of total emissions over the course of the project based on information on annual emissions provided in the DEIR:

Grp 16-9

Total Proposed CO2e MT Produced

Time Period	Annual Amount	Number of Years	Total CO2e (MT)
2021	3,444.55	1 year	3,444.55
2022-2026	7,221.64	5 years	36,108.20
2027-2032	6,999.63	6 years	41,997.78
2033-2102	9,041.23	69 years	623,844.87
2103	46.09	1 year	46.09
Total		**81 years**	**705,441.49**

The project is estimated to generate more than 700,000 MT CO2e over its 81 year lifetime, which is equivalent to an average annual rate of emissions from the project of over 8,700 MT CO2e per year. The table above, showing total CO2 emissions illustrates the relatively minor impact that emissions during construction will have on global warming, compared to operational emissions. Given these vast differences in impact, and armed with the knowledge that CO2 resides in the atmosphere for hundreds of years, the DEIR's emphasis on the purchase just 2,444.55 carbon offset credits to mitigate the GHG emissions from the project might appear to the reader of the DEIR to be absurd, since this represents just 0.35 percent of the total GHG impact of the project.

Grp 16-10

Presumably, the rate at which the project produces GHG emissions will depend on a number of variables affecting mining operations, including the price of gold, subsurface conditions, and other factors that are difficult to accurately predict. The price of gold is likely to fluctuate over time, and activity at the project site will likely fluctuate as well. As a result, it seems reasonable to expect that the rate of GHG emissions may vary also. On page 4.3-50, the DEIR states that "the principal variation in operational activities over the lifetime of the project is the fate of non-gold bearing mined material that could be used as fill material." Is this an accurate statement? Or do external economic factors, such as the price of gold, have a bigger potential to impact operations? It should be noted that in the period between 1975 and 2022 the price of gold ranged from about $150/ounce to over $2,000/ounce. But during this time, there were a number of large fluctuations in price. The DEIR does not discuss the dependence of operational intensity on such factors, and gives the impression that the activities will occur at the same dependable steady rate for the life of the project. If this is not a reasonable expectation, the DEIR should discuss the potential for fluctuations in activity, including the relationship between operational activity and gold price, since among other things, these fluctuations may impact the rate of GHG emissions.

Grp 16-11

Page 4.3 -96-99 Carbon Offsets - Construction Emissions

The Nevada County Chapter of CCL supports carbon pricing as a means of reducing demand for fossil fuels and increasing demand for alternative sources of energy, because the cost of producing energy from fossil fuels does not adequately reflect the hidden environmental costs of GHG emissions. Although Carbon Offsets are not designed to reduce GHG emissions, we recognize that Carbon Offsets can be an effective interim measure to prevent new sources of GHG emissions from increasing the amount of CO2e in the atmosphere. Unfortunately, the project as currently proposed would only offset a tiny percentage of the emissions it produces. According to the California Climate Investment 2021 Annual Report, the cost of carbon offsets in 2020 was $125/MT CO2e, and the market price of Carbon Offsets is expected to continue to increase over time. This price is one measure of the true cost of emitting one ton of CO2, because it represents the cost of removing one ton of CO2 from the atmosphere by other means. Of course, not emitting the CO2 in the first place, by using an alternative source of energy or by increasing energy efficiency, would be preferable, but is not always feasible at the present time. The State's goal of achieving carbon neutrality (also known as Net Zero) by 2045 means that by 2045 the State would contribute, including offsets, the equivalent of no GHG emissions. Of course, any GHGs emitted before reaching Net Zero would continue to contribute to global warming. If Rise Gold does not mitigate the approximately 700,000 MT CO2e that the project would emit, then in order to achieve Net Zero, the people of the State will need to offset Rise Gold's GHG emissions through other means, such as developing alternative energy sources, reducing energy use, increasing energy efficiency, and developing carbon removal technologies. In effect, the people of California will need to subsidize the project to the tune of $125/MT CO2e at the current price of offsets. The cost to the public today of this subsidy to Rise Gold would be approximately $88 million, or roughly the value of 44,000 ounces of gold at current prices. This cost is likely to increase as the project proceeds. The question that should be asked is whether this is a good use of public money, and whether the project itself should bear this cost.

4.3-7(b) Carbon Offsets – Construction Emissions.

The discussion of "Carbon Offset Standards – Eligible Registries, Acceptable Protocols and Defined Terms" does not mention the State of California Cap and Trade program. By proposing to set standards for carbon offsets, the DEIR apparently would allow carbon offsets of any kind from any place in the world, as long as the carbon offsets could be evaluated to meet the proposed standards. The DEIR states that "Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the "Reporting and Enforcement Standards" below is submitted to the County."

This proposal ignores the suite of projects that make up the California Cap and Trade program. Because the carbon emissions generated by the project occur in California, and impact California's citizens, the carbon offsets purchased by Rise Gold should be California Cap and Trade program offsets, not cheaper and less effective offsets from some other state or foreign country.

Grp 16-12

Such a mitigation measure risks harming Nevada County by undermining our ability to reduce or to eliminate GHG emissions. It also undermines the ability of Nevada County to participate in GHG emissions reductions plans of the State of California and the USA. If many jurisdictions in California approve projects that create new GHG emissions, and take the approach of the DEIR, California will not be able to reduce GHG emissions sufficiently to actually be effective in combating climate change.

Therefore, the proposed mitigation measure should be strengthened. The proposed mitigation measure should require Rise Gold to purchase California Cap and Trade program carbon offsets exclusively.

Also, the mitigation measure should include a requirement for Rise Gold to submit plans outlining how they will achieve Net Zero GHG emissions by 2045, the State of California goal, or sooner. The 80 year life of the proposed project permit extends far beyond the timeline for global Net Zero goals, and so is inconsistent with strategies established by the State of California.

The proposed Carbon Offset mitigation measure cannot reduce the cumulative impacts of this proposed project with regard to its GHG creation, both direct and indirect, construction and operational, for an 80 year permit. The significance level will not be reduced from CC to LCC. Therefore, the mitigation measure is inadequate.

Page 4.3-101 Cumulative Analysis

No cumulative analysis of GHG emissions for the Rise Gold project in the context of the atmosphere of the State of California is presented in the DEIR. All that the DEIR provides the public is a general discussion regarding twenty projects within Nevada County and the following statement:

Grp 16-13

"Based on the above considerations, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Consequently, the project's impact is less than cumulatively considerable."

However, the proposed project conflicts with AB32 and the State of California Climate Scoping Plan because the project is estimated to produce over 700,000 MT CO2e which will cumulatively impact the global and California climates in combination with other known or reasonably foreseeable projects.

Page 5.2 Section 5.2 Cumulative Impacts

No identification of cumulative impacts of GHG emissions is presented in the DEIR.

In California Supreme Court case S217763 Center for Biological Diversity v. California Department of Fish and Wildlife; Newhall Land and Farming, the question was asked: "Does the Environmental Impact Report validly determine the development would not significantly impact the environment by its discharge of greenhouse gases?" Although the court found that the Lead Agency may rely upon numerical thresholds of significance for greenhouse gas emissions, "use of such thresholds is not required." The Court went on to advise that "Thresholds only define the level at which an environmental effect 'normally' is considered significant; they do not relieve the Lead Agency from its duty to determine the significance of the impact independently."

Grp 16-14

Nevada County, as Lead Agency, has a duty to the public to independently determine the impact of the Rise Gold project in generating over 700,000 MT CO2e over 81 years of construction, operations, and reclamation. That duty includes recognition of Nevada County's responsibility to reduce GHG emissions within the context of the State of California's goals under AB32, the updated Climate Scoping Plan, and EO B-55-18, among other goals and policies. The DEIR fails to address the cumulative impacts of generating over 700,000 MT CO2e in terms of the additive contribution to worsening the impacts of climate change on the State of California.

The DEIR should be revised to include a thorough cumulative impact analysis. This analysis should describe to the public how the Rise Gold project would impact the State of California as it attempts to reduce GHG production over the next 80 years.

Page 5.7 Table 5-2 Cumulative Geographic Scope by CEQA Topic

For Air Quality/Greenhouse Gas Emissions, the DEIR states that "the geographical context for global climate change is limited to the State of California." The DEIR also states that "at this time, neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project."

Grp 16-15

Despite the lack of applicable numerical thresholds of significance, the DEIR then identifies significance thresholds that have been developed by several air quality management agencies, including the Sacramento Metropolitan Air Quality Management District (SMAQMD), the Placer County Air Pollution Control District (PCAPCD), the Bay Area Air Quality Management District (BAAQMD), and the South Coast Air Quality Management District (SCAQMD). Although these agencies have adopted similar significance thresholds, each jurisdiction's limits and rationales differ somewhat. Since none of these significance thresholds is applicable to the project, they provide no more than guidance to the Rise Gold project EIR and Nevada County is free to set significance thresholds of its own, based on other, possibly more appropriate criteria.

Examination of the supporting documents for the various Air Management Districts' significance thresholds reveals plenty of leeway for Nevada County to adopt a more appropriate significance threshold than the ones presented in the DEIR, such as a zero net GHG emission threshold, or a single 1,100 MT CO2e per year threshold, consistent with the screening threshold used by the SMAQMD following the California Supreme Court decision in Center for Biological Diversity v. California Department of Fish and Wildlife; Newhall Land and Farming in 2016.

The SCAQMD's Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG Significance Threshold, (October 2008), provides a detailed explanation of the origins and rationales for the SCAQMD's significance thresholds. The Draft Guidance Document cites a White Paper on Global Climate Change prepared by the Association of Environmental Professionals in 2007 that identified eight approaches it suggested that a Lead Agency may select in a CEQA document to address potential impacts of global climate change and a project's cumulative contribution to GHG. The only one that included a significance threshold was Approach 6, which would use zero net carbon dioxide equivalent increase as the threshold (http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf).

Shortly after, the California Air Pollution Control Officers Association (CAPCOA) prepared a White Paper: CEQA and Climate Change, in which three basic approaches were identified: including a zero GHG emissions threshold; and two non-zero threshold variations. The SCAQMD opted to adopt one of the non-zero threshold approaches rather than a net zero approach, but the basis for this choice was that the threshold was consistent with the goal of EO S-3-05 to reduce GHG emissions to a level 80 percent below 1990 levels or 90 percent below current (2008) levels by 2050. We now have not only a better understanding of the threats posed by global warming, but the State of California has decided to embark on a more ambitious path to addressing these threats by setting a goal of achieving net zero by 2045. Perhaps it is time to set significance thresholds lower as well.

In June 2020, the SMAQMD prepared "Greenhouse Gas Thresholds for Sacramento County" which discusses the development and rationales for its own GHG significance thresholds. In this document, SMAQMD explains that to assist lead agencies in determining significance, in October 2014 it adopted the current GHG thresholds of significance which include a construction threshold of 1,100 MT GHG/year, a land use operational threshold of 1,100 MT GHG/year, and a stationary source operational threshold of 10,000 MT GHG/year: (https://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf).

The document further explains that following the California Supreme Court decision in Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming in January 2016, SMAQMD recommended suspending the thresholds for operational emissions, leaving only a 1,100 MT GHG/year screening threshold and the need to demonstrate all feasible mitigation for projects exceeding this threshold. SMAQMD then encouraged local agencies (in Sacramento County) to develop a Climate Action Plan (CAP) or GHG reduction plan "that could be used by the local agency to reduce GHG emissions and streamline CEQA review for development projects which can provide

adequate mitigation for GHG impacts by demonstrating consistency with the reduction measures adopted in the CAP." Thus, even within Sacramento County, SMAQMD recognizes that individual local agencies should be able to set their own significance thresholds for evaluation of CEQA projects.

To illustrate the increasing concerns about the State's ability to meet the goals of Executive Order B-55-18 (Carbon Neutrality), SMAQMD notes that "in January 2019, CARB held a workshop regarding carbon neutrality in California, during which CARB staff explained that the definitional parameters and meaning of the term – carbon neutrality – are still being explored. CARB intends to hold additional workshops to explore specific topics related to the pursuit of carbon neutrality, engage with other experts in the field and stakeholders, and conduct research to ensure than any path to carbon neutrality balances scientific, economic and social justice principles."

In 2018 the California Natural Resources Agency (CNRA) finalized its updated "CEQA Guidelines Amendments" document. The guidelines include the following (underlines added for emphasis):

1. Lead agencies must analyze the GHG emissions of proposed projects.
2. The focus of the lead agency's analysis should be on the project's incremental contribution to climate change, rather than simply focusing on the quantity of emissions and how that quantity of emissions compares to statewide or global emissions.
3. The impacts analysis of GHG emissions is global in nature and thus should be considered in a broader context. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions.
4. Lead agencies should consider a timeframe for the analysis that is appropriate for the project.
5. A lead agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes.
6. Lead agencies may rely on plans prepared pursuant to section 15183.5 (Plans for the Reduction of Greenhouse Gases) in evaluating a project's GHG emissions.
7. In determining the significance of a project's impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is consistent with those plans, goals, or strategies.
8. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change.

Given the increasing risk that California, the US, and the world, may fail to achieve the reductions in GHG emissions necessary to forestall catastrophic global warming, it seems incumbent upon agencies to recognize the need to mitigate as many GHG emissions as feasible. Ignoring the incremental effects of the GHG emissions from the Rise Gold project simply because "operational" GHG emissions are treated differently from emissions from other types of sources conflicts with several of CNRA's guidelines listed above, and especially with the fifth item: "A lead agency's analysis must reasonably reflect evolving scientific knowledge and state regulatory schemes."



Grp 16-16

For the reasons discussed above, the appropriate significance threshold for GHG emissions from the Rise Gold project is a Zero Threshold. In effect, this was the threshold ultimately adopted in the Settlement following the State Supreme Court's decision in California Supreme Court case S217763 Center for Biological Diversity v. California Department of Fish and Wildlife; Newhall Land and Farming.

Even if a significance threshold of 10,000 MT CO2e per year for "operational" GHG emissions is adopted by Nevada County in the DEIR, and the estimates provided in the DEIR are accepted as reasonable, given the uncertainties associated with the assumptions of the analysis, the uncounted GHG contributions associated with the production of the building materials that will be used in the project, and the chance that unforeseen conditions that may be encountered during the project will increase the actual GHG emissions, nominal annual operational emissions of 9,000 MT CO2e per year should probably be considered close enough to 10,000 MT CO2e per year to warrant full mitigation. Nevada County has a responsibility to help California achieve its goal of net carbon neutrality by 2045, to the extent feasible, by not adding the additional burden of this project on the backs of the citizens of California.

GROUP LETTER 16: DAVID WHITEHEAD, NEVADA COUNTY CHAPTER OF CITIZENS' CLIMATE LOBBY/EDUCATION (CCL)

Response to Comment Grp 16-1

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. Comment noted.

Response to Comment Grp 16-2

The commenter has identified a transcription error in the summary Table 2-1 of the DEIR. This error is a typo and does not affect the impact analysis. Table 2-1, Mitigation Measure 4.3-7(b), page 2-23 of the DEIR, is hereby revised as follows:

> *4.3-7(b)* ***Carbon Offsets – Construction Emissions.***
>
> *Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO_2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling ~~2,664~~ 2,345 MT CO_2e, which was calculated by subtracting 1,100 MT CO_2e (threshold) from the construction emissions generated by the project.*

The 2,345 MT CO_2e carbon offset value is already correctly calculated at 2,345 metric tons on page 85 of Appendix E.1 and for Mitigation Measure 4.3-7(b), as presented in Chapter 4.3 of the DEIR. This has been corrected in the Final EIR, as shown above. Contrary to the commenter's assertion, an editorial error does not cast aspersion on the underlying quality of the data.

Response to Comment Grp 16-3

The commenter asserts that the DEIR presents a misunderstanding regarding the cumulative nature of GHGs and intimates that any GHGs above zero should be considered potentially significant. Firstly, the statement quoted by the commenter is not in reference to the global nature of GHGs, but rather the regulatory required improvements in engines and associated reduction in emissions in future years. Regarding the cumulative nature of GHGs, the DEIR already acknowledges the potential impacts on a global, statewide, and Sierra Nevada regional scale from GHGs (see "Potential Effects of Climate Change" starting on page 4.3-15 of the DEIR). Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. However, regarding the commenter's assertion that any project that results in GHGs above net zero should be considered significant is inconsistent with the statewide guidance. As described in the DEIR on page 4.3-29:

> The 2017 Scoping Plan further provides that "the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

The lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27 – GHG Thresholds). These thresholds are the metric used to determine if the project results in a substantial contribution to the cumulative GHG impact. Given that the project would result in GHG emissions below the

applied construction threshold (after mitigation) and below the applied operational threshold (no mitigation required), and because the project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, the project would not result in a cumulatively considerable GHG impact.

Response to Comment Grp 16-4

The commenter asserts that the DEIR is inadequate for not properly identifying the impacts of GHG emissions that will result from the project, and for not presenting a full range of feasible measures to mitigate those impacts. Notably, the GHG emissions presented in the DEIR are conservative, given that California regulations will reduce GHG emissions over time. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. Further, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27 – GHG Thresholds). These thresholds are based on annual GHG emissions, rather than life cycle emissions of a project, which the commenter suggests the project's impacts should have been evaluated on. However, life cycle emissions are not required to be assessed under CEQA (please see Master Response 26 – Life Cycle GHG Emissions). Given that the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required.

Response to Comment Grp 16-5

The commenter expresses concerns regarding the implied precision in the GHG emissions estimates presented in the DEIR. CEQA requires a good faith effort to estimate emissions from the project during construction and operation. It is common that granular details, such as exact distances that each truck travels for a project are unknown during the drafting of documents in support of CEQA. As such, estimation of emissions during the construction and operation of the project are based on the best project-specific information and industry-standard emission factors that were available at the time of analysis, as thoroughly described in the "Method of Analysis" of Chapter 4.3 of the DEIR, beginning on page 4.3-44. Changing the number of digits in the presentation of emissions estimates for the report would not change the analysis or conclusions in the DEIR. As stated by California Courts, "The need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d at p. 406.) As such, the County acknowledges the comment and notes it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the DEIR. The comment has been provided to the decision-makers for their consideration prior to a final decision on the project.

Response to Comment Grp 16-6

This comment pertains to a "lifecycle" analysis for GHG emissions, which is not required under CEQA. Please see Master Response 26 - Life Cycle GHG emissions.

Response to Comment Grp 16-7

This comment pertains to a "lifecycle" analysis for GHG emissions, which is not required under CEQA. Please see Master Response 26 - Life Cycle GHG emissions.

Response to Comment Grp 16-8

The commenter suggests that the County should apply different thresholds than what were used in the analysis and summarizes the ongoing evolution of statewide GHG regulations. In regard to the GHG thresholds applied to the project, please see Master Response 27 - GHG Thresholds. Regarding GHG regulations, the commenter states that the "DEIR should discuss this [regulatory] direction and, if possible, any foreseeable changes in State policy that may impact the project". Statewide GHG regulations are thoroughly discussed in the DEIR beginning on pages 4.3-25 through 4.3-34. The project would not preclude the State from implementing these regulations that would reduce statewide GHG emissions. Rather, the "foreseeable changes in State policy" cited by the commenter, such as California requiring utility providers to supply electricity from 100% renewable sources by 2045, would result in a reduced estimated GHG emissions inventory associated with the project in future years, had they been accounted for in the project analysis. Finally, CEQA does not have a requirement for a project to mitigate beyond the threshold.

Response to Comment Grp 16-9

This comment pertains to a "lifecycle" analysis for GHG emissions, which is not required under CEQA. Please see also Response to Comment Grp 16-4 above. The commenter also implies that the project should be required to mitigate for operational GHG emissions, even though these emissions were found to be below the applicable CEQA threshold of 10,000 tons per year and were therefore deemed less than significant. CEQA does not require mitigation for impacts that are less than significant. Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 16-10

The commenter suggests that economic uncertainty and price of gold will affect the rate of mining. The project's emissions are estimated at the maximum production rate of the project (1,000 tons per day mineralized rock and 500 tons per day of barren rock). Higher production levels, which could result in higher GHG emissions are not proposed by the project and would not be allowed by the conditional use permit. As such, the analysis included in the DEIR presents the maximum reasonably foreseeable GHG emissions scenario. Variability in the price of gold, therefore, cannot result in an increase of GHG impacts from the project.

Response to Comment Grp 16-11

The commenter suggests that the project should purchase offsets such that the lifetime emissions would be net zero. Notably, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27 – GHG Thresholds). These thresholds are based on annual GHG emissions, rather than life cycle emissions of a project, which the commenter suggests the project's impacts should have been evaluated on. However, life cycle emissions are not required to be assessed under CEQA (please see Master Response 26 – Life Cycle GHG Emissions). Given that the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required. CEQA does not have a requirement for a project to mitigate beyond the threshold or to mitigate impacts deemed less than significant.

In addition, the project GHG inventory in the DEIR makes conservative assumptions for GHG emissions over the life of the project. As shown in Table 22 of Appendix E.1, for the Year 2033 to 2102 Scenario, PG&E supplied electricity makes up the majority (51%) of GHG emissions from the project at 4,636 metric tons. GHG emissions from electricity are calculated based on an

intensity factor of 204 pounds per MWh. These values will decrease over time due to the Renewable Portfolio Standard but were used for all scenarios as a conservative estimate (see page 347 of Appendix E.1). "On-road vehicles – Off-Site" makes up a large part (35%) of GHG emissions from the project at 3,123 metric tons. These emissions are primarily generated by haul trucks which are assumed to deliver engineered fill at an average distance of 60 miles (see page 246 of Appendix E.1). As heavy trucks and passenger vehicles are eventually transitioned to battery-electric vehicles, these emissions will likely be less than assumed in future years.

Response to Comment Grp 16-12

The commenter states that the project should exclusively use Cap-and-Trade compliance offsets. However, the project would not be a covered entity under the State's Cap-and-Trade program, as described in the California Air Resources Board's *Cap-and-Trade Instructional Guidance* (2012):

> Starting in 2012, major GHG-emitting sources, such as electricity generation (including imports), and large stationary sources (e.g., refineries, cement production facilities, oil and gas production facilities, glass manufacturing facilities, and food processing plants) that emit more than 25,000 MT CO_2e per year will have to comply with the Cap-and-Trade Program. The program expands in 2015 to include fuel distributors (natural gas and propane fuel providers and transportation fuel providers) to address emissions from transportation fuels, and from combustion of other fossil fuels not directly covered at large sources in the program's initial phase.

(https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf.) In addition, per the California Air Resources Board's *Draft 2022 Scoping Plan, Appendix D – Local Actions*:

> Over the years, agencies and courts have provided direction and guidance regarding GHG mitigation. Nevertheless, given the variety of potential projects and mitigation scenarios, some uncertainty and misconceptions persist. For example, when lead agencies consider offsite GHG mitigation (including offsets), they may sometimes conflate the requirements for compliance-grade offsets in California's Cap-and-Trade regulation with the requirements for GHG mitigation measures under CEQA. The Cap-and-Trade regulation requires that compliance offsets meet certain regulatory criteria, which specify that compliance offsets must be real, additional, quantifiable, permanent, verifiable, and enforceable. In general, the State's Cap-and-Trade Program restricts compliance offsets from being used for any purpose other than Cap-and-Trade compliance, including being used as mitigation under CEQA [emphasis added].

The project does not emit 10,000 MT of CO_2e per year and is not subject to the Mandatory Reporting Regulation since it does not result in more than 25,000 MT MT CO_2e per year. See CARB regulations for the mandatory reporting of GHG emissions on page 4.3-29 of the DEIR. The project is not a covered entity under Cap-and-Trade, and therefore Cap-and-Trade offsets cannot be used as mitigation for the project.

In addition, Mitigation Measure 4.3-7(b) specifies the requirements for carbon credits be real, additional, quantifiable, permanent, verifiable, and enforceable and does not allow "carbon offsets of any kind from any place in the world", as suggested by the commenter. Please see also Response to Comment Grp 16-11 above, which pertains to the commenter's assertion that the project should purchase offsets such that the lifetime emissions would be net zero. In addition, please see Master Response 28 - Greenhouse Gas Credits regarding the validity of mitigation requirements for carbon offsets.

Response to Comment Grp 16-13

The commenter asserts that the DEIR does not discuss cumulative GHG impacts. However, as GHGs are definitionally only a cumulative impact, the assessment included in the DEIR is a cumulative analysis. This topic is addressed above in Response to Comment Grp 16-3.

Response to Comment Grp 16-14

The commenter asserts that the DEIR does not discuss cumulative GHG impacts. This topic is addressed above in Responses to Comments Grp 16-3 and Grp 16-13.

Response to Comment Grp 16-15

The lead agency has determined that the appropriate threshold of significance for the project is 1,100 MT CO2e per year construction and 10,000 MT CO2e per year for operations. Please see Master Response 27 - GHG Thresholds.

The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, do not establish specific quantitative thresholds of significance, and do not mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009). In summary, the County has discretion on how to evaluate the significance of GHG emissions under CEQA and could rely on other adopted thresholds if substantial evidence is provided, as explained in Section 3.4, Significance Criteria and Methodology, in the Air Quality and GHG Emissions Technical Report.

The commenter emphasizes the importance of conducting analyses that reflect evolving scientific knowledge and regulatory schemes. Notably, the commenter does not specify how the analysis does not reflect evolving scientific knowledge or regulatory schemes. However, for additional substantiation of the GHG approach to analysis in the DEIR, the CARB 2022 Draft Scoping Plan, which was released in May 2022 after the publication of the DEIR, as well as the project's NOP, is briefly discussed herein.

First, the Draft 2022 Scoping Plan provides the blueprint for how California can achieve carbon neutrality by 2045 or earlier. Even with ambitious and aggressive strategies to reduce anthropogenic sources of GHG emissions, achieving carbon neutrality is not accomplished in the state by reducing all sources of GHG emissions to zero. Instead, some sources, such as the industrial, agriculture/recycling/waste and electricity generation sectors, are anticipated to continue to generate GHG emissions to support California's growing economy and provide services, such as energy production and transmission, to the state (See Figures 2-1 and 2-5)[6]. As the state's GHG emissions inventory is anticipated to be greater than zero, addressing the residual GHG emissions (i.e., the gap in GHG emissions between non-zero and zero) are anticipated to be achieved through carbon capture and storage through natural and working lands and mechanical technologies. In summary, while ambitious strategies must be implemented to achieve carbon neutrality, not all development can or is expected to operate at a net carbon neutral level to support the state in meeting their carbon neutrality goals.

Second, the Draft 2022 Scoping Plan, Appendix D, Local Actions, provides some guidance on evaluating project-level alignment with state climate goals.[7] The first approach that the State recommends for proposed land use developments to demonstrate that they are aligned with State climate goals is based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing; however, this approach is not applicable

[6] https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf
[7] https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

to the project as it only applies to residential and mixed-use development projects. The second approach CARB outlined is net zero GHG emissions, which they noted may be an appropriate overall objective for new residential development, but this approach may not be feasible or appropriate for every project. The two examples of land use development projects in Appendix D (Newhall Ranch and Centennial) that committed to net zero are very large primarily residential developments and are not representative of typical development under CEQA, including the proposed project. The third approach to demonstrating project-level alignment with State climate goals is to align with GHG thresholds of significance, which many local air quality management (AQMDs) and air pollution control districts (APCDs) have developed or adopted. Use of a numeric threshold adopted by AQMDs/APCDs, as expert agencies, was applied in the DEIR GHG emissions analysis. As such, the DEIR GHG emissions analysis does not conflict with evolving science and regulation as provided in the CARB 2022 Draft Scoping Plan, albeit being released following public review of the project's DEIR.

Response to Comment Grp 16-16

This is a summary of the commenter's previous statements. Please see Responses to Comments Grp 16-1 through Grp 16-15. The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the DEIR.

Group Letter 17

March 30, 2022

To: Matt Kelley, Senior Planner
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950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
Email: matt.kelley@co.nevada.ca.us
DEIR Comment Email: idaho.mmeir@co.nevada.ca.us

Re: Idaho-Maryland Mine Project Draft Environmental Impact Report
To Matt Kelly

Comments submitted by Don Rivenes
On Behalf of Nevada County Climate Action Now

Our organization also has signed on to group comments submitted by Community Environmental Advocates Foundation

Re: Section 4.3 Air Quality, Greenhouse Gas Emissions, And Energy

The DEIR report reaches the following conclusion:
Page 4.3-92 - 4.3-7 "Generation of GHG emissions that may have a significant impact on the environment. Based on the analysis below and with implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is *less than cumulatively considerable*.
Table 4.3-23 Estimated Annual Greenhouse Gas Emissions (Metric Tons) shows the analysis.
Page 4.3-94 - "As shown in Table 4.3-23, the project would not exceed the applied threshold of 10,000 MT CO2*e* per year during operations and reclamation. However, the project would exceed the 1,100 MT CO2*e* per year threshold during construction.

Grp 17-1

Dispute of the DEIR conclusions

Emergency Generators
The statement on page 4.3.94 - "The diesel emergency generators were assumed to operate up to a maximum of 100 hours per year for routine testing and maintenance, per the CARB ATCM for Stationary Compression Ignition Engines" fails to consider the operational hours of the generators under PG&E PSPS conditions and other power shutoffs due to local weather. One four- day outage would equal the hours indicated.

Off-road equipment
Page 4.3-51 Table 6. Operational Off-Road Equipment Assumptions
The only changes noted between the February 2020 Dudek report and the December 2021 DEIR are that the following equipment went from diesel to electric:

Grp 17-2

		Qty	Usage per day	Days per week
Jumbo drill carrier	Diesel	3	4	7
LHD units	Diesel	6	20	7
Personnel all-terrain vehicles	Diesel	10	12	7

All other equipment remained the same.
And yet the Co2e emissions for 2022-2032 went from 2130 metric tons in Table 17 on page 73 of the February 2020 report to 755 metric tons in Table 4.3-23. The total hours for this electric equipment in 2022-2032 are just a small part of the off-road equipment and shouldn't account for the difference going from 2130 metric tons in the February 2020 report to 755 metric tons in the DEIR. The DEIR must account for this difference.

On-road equipment – off and on site

Grp 17-3

The Co2e emissions for 2022-2026 went from 1528 metric tons in Table 17 on page 73 of the February 2020 report to 923 metric tons (off-site) and 75 (on-site) in Table 4.3-23. The On-road vehicles exact difference is explained due to a change to the figure for cement vehicles. February 2020 report shows 649.4 for CO2e emissions while December 2020 report shows 64.94. Based on the factor used it appears the decimal correction is justified. However, it doesn't give us confidence for any other figures where a decimal can be misplaced, in this case bringing down the total but perhaps in other case the number could go up. The DEIR must show the factors used when converting miles driven to CO2 emissions for each of the vehicles.

We also ask what factors were used to relate miles travelled with emissions generated. This must be provided.

Cement Vehicles

Grp 17-4

Page 4.3-53 Table 4.3-11 Operations Off-Site On-Road Vehicle Trip Assumptions in a explanatory point states: "Freight, cement, and explosives trucks were assumed to have an average 60-mile distance assuming that these materials would come from distribution facilities in Sacramento California."

The CalPortland website states: "CalPortland in Stockton California manufactures Portland cement in three cement plants located in Mojave, CA; Oro Grande, CA; and Rillito, AZ. Their state of the art distribution system features the operation of a deep water international import terminal located in Stockton, CA with an additional transfer terminal in Stockton, CA."

Table 4.3-11 figures do not include the CO2 emissions from transporting the cement from production point to Sacramento (for example from Oro Grande in the desert to Stockton and from Stockton to a pickup point for the truck).
We assume that the cement is not manufactured in Sacramento. The DEIR must state where the Portland cement is manufactured and include the transportation miles to get the cement to Sacramento.

Emission standards

Appendix E Table 22 page 83 shows for the years 2033-2102, the DEIR shows 9,041 metric tons of Annual Greenhouse Gas Emissions and declares them under the threshold of significance.

The DEIR seeks to justify its chosen significance threshold of 10,000 MT CO_2e for operational GHG emissions by looking to other air district standards. This standard from other air districts was based on old California requirements and is not consistent with the S.B. 32's statewide GHG reductions goals for 2030 and beyond.

Grp 17-5

The DEIR must use a significance threshold that will achieve California's new statewide GHG reductions goals over the proposed 80-year lifetime of the Project. Considering state goals and the severity of climate change, ***any*** operational GHG emissions over existing conditions are significant.

The California Air Resources Board 2017 Climate Change Scoping Plan stated: "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.". Given these facts, the DEIR must establish a net zero threshold for new GHG emissions from the Project and declare the project has significant and unavoidable impacts.

Cement emissions from production

We feel that the embedded emissions in cement production are a legitimate concern for the county. If they were included in the total emissions, the indefensible standard of 10,000 MT CO2e would be exceeded.

In a paper entitled Production, Consumption and Lifecycle Greenhouse Gas Inventories: Association of Environmental Professionals, California Chapter, Climate Change Committee August 2017" it was stated:

Grp 17-6

"There have been a few CEQA analyses for projects that have included estimates of emissions associated with certain construction materials, such as concrete. While it is feasible to estimate upstream emissions associated with cement manufacturing (provided reasonable and non-speculative assumptions can be made about cement source, and production emissions data is available), the emissions associated with cement manufacturing by non-project entities are accounted for in project inventories for the cement plant, and by the jurisdiction containing the cement plant.
Thus, inclusion of such emissions would result in double-counting of emissions. Furthermore, in the case of cement, manufacturing is directly regulated by the state, both as a point source and under the California cap and trade regulation, and thus such emissions can be presumed to be controlled sufficiently through state regulation to meet the state's legislated GHG reduction goals. While one could include cement manufacturing emissions associated with project concrete use, the addition of such emissions would not add any information necessary to make conclusions about the significance of project emissions compared to statewide reduction goals."

We are interested in these emissions because the County has created an Energy Action Plan whose goal is the reduction of GHG emissions. They may already have been counted at the plant level and for state goals, but we are including them for this project as avoidable emissions in that the emissions would not have occurred if this project were not done.

Therefore, to calculate the GHG impact from the Idaho-Maryland mine, one must include the embedded impact from the manufacture of the Portland cement. Embedded cost, in the context of energy costing, refers to the full amount required for a certain amount of energy to be provided.

To calculate the amount of cement used by the mine, Page 4.3-53 Table 4.3-11 Operations Off-Site On-Road Vehicle Trip Assumptions Table shows 936 cement truck trips each year over the 80 year lifetime. Each employee and truck are assumed to generate two one-way trips or 468 actual round trips per year with cement.

A cement truck on the average carries 8 cubic yards of cement weighing 2,538 pounds per cubic yard (Portland Cement Conversion Amount: 1 cubic foot of volume equals: 94.00 pounds (lb) in mass (source Traditionaloven) or about 20,300 pounds of cement or 9.2 metric tons.

We ask that the DEIR provide the projected yearly amount of cement. For these comments, we will use the more conservative number based on tonnage carried in a cement truck.

Grp 17-7

Carbon dioxide intensity is measured in metric tons of CO2 emitted per metric ton of cement produced. Manufacturing a ton of cement releases 0.73–0.99 tons of CO2 [6] *[6] WBCSD, Getting the numbers right: cement industry energy and CO2 performance, World Bus. Counc. Sustain. Dev. (2011) 42. [7] CEMBUREAU - the European Cement Association*

The performance in the Annex 1 regions is largely a result of the fairly high CO2 intensity of the cement industry in North America, at 760 kg net and 790 kg gross CO2 emissions per tonne of cementitious product, significantly higher than any other region. *A decision support tool for cement industry to select energy efficiency measures Alireza Mokhtar a,*, Mohsen Nasooti b*

The national weighted average carbon intensity for cement production is estimated at 0.97 metric ton CO2/ton cement. Thus, each cement truck would contain cement that released about 8.3 metric tons of CO2 when it was produced. Operationally, 468 truck trips would mean 3,884 metric tons of CO2 were released in a year of cement production for the mine.

The revised DEIR should provide adequate information to quantify these GHG emissions and include the quantities in their emission totals for significant impacts.

Grp 17-8

Mitigation suggested for construction phase

Page 4.3-96 4.3-7(b) ***Carbon Offsets – Construction Emissions.***
"Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO2e) per year construction threshold, consistent with the performance standards and requirements set forth below."

The DEIR proposes to mitigate only 68 percent of the Project's construction-related GHG emissions and the entirety of that mitigation will rely on offsets.

The proposed GHG offset mitigation measure is impermissibly deferred without adequate performance standards, in violation of CEQA. The EIR fails to evaluate the foreseeable environmental impacts of offset projects. The DEIR fails to analyze additional feasible on-site mitigation for GHG emissions.

Grp 17-9

Mitigation of operation phase

The DEIR's GHG offset mitigation measure is unenforceable, delegates verification and enforcement to private third parties, and lacks specific performance standards essential to ensure the effectiveness of the mitigation. We are not in favor of the County allowing for ongoing emissions for this project over the next 80 years. It will be difficult enough to reach the California goal of net-zero carbon by 2045 without adding more unnecessary carbon in the atmosphere.

These operational emissions are a significant and unavoidable impact that calls for rejection of the Plan.

Grp 17-10

Nevada County Energy Action Plan

In 2018 Nevada County adopted an Energy Action Plan to assist the County in implementing the energy goals and policies in the County's General Plan and inform the community of best practices that will help them save energy and money.

The Plan calls for a 51% reduction in greenhouse gas emissions for electricity use by 2035, which is in close alignment with state goals. The Plan forecasts residential energy reduction savings from building efficiency of 42 million kilowatt hours per year.

The DEIR states the amount of electricity required to operate the mine would be approximately 49 million kilowatt hours per year, which would erase any residential electricity savings attained by the Plan.

It is even more stunning when you know that the total non-residential electricity use of the county in 2017 was 53 million kWh/Yr. So, this one mining project would almost

match all other non-residential electricity use in the County and wipe out the projected 9 million kWhYr non-residential efficiency savings.

Asking residents and business owners to cut down their use of electricity while allowing the electricity use of the mine would be highly counter-productive. The DEIR must explain how the project intends to comply with the goals of the Nevada County Climate Action Plan. These goals approximately match SB32 goals

Thank you for consideration of my comments.

Donald J Rivenes

Don Rivenes, Coordinator
Nevada County Climate Action Now
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GROUP LETTER 17: DONALD RIVENES, NEVADA COUNTY CLIMATE ACTION NOW

Response to Comment Grp 17-1

The commenter acknowledges that their organization has signed on to comments provided by Community Environmental Advocates. Please see responses to Group Letters 7 and 8.

The commenter suggests that emergency generator usage for Power Safety Power Shutoffs (PSPS) and other local weather condition should have been accounted for. Given that it is unknown if/ when a PSPS would occur, it is considered a speculative event, and per the CEQA Guidelines, if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (See Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The use of emergency generators is speculative and beyond the reasonable control of the applicant. However, criteria air pollutant emissions associated with 24-hour operation of the emergency generators is provided in Table 4.3-25 of the DEIR on page 4.3-104 for informational disclosure purposes only.

Response to Comment Grp 17-2

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Notably, the DEIR is based on the most recent Air Quality and GHG Report (dated November 2021) included as Appendix E.1 of the DEIR. Numerous revisions were made to the Air Quality Report during the preparation of the DEIR. The report presented in Appendix E.1 of the DEIR is the final version of this report. The analysis presented in the DEIR uses the final version of the report and reconciliation to draft versions of this report is not relevant to the analysis of the DEIR.

Response to Comment Grp 17-3

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Please see response to comment Grp 17-2 regarding draft versions of the air quality report. Emission factors for conversion of miles driven to carbon dioxide (CO_2) and other emissions are already included in Appendix E.1 of the DEIR.

Response to Comment Grp 17-4

The commentator suggests that GHGs associated with the transport of cement by third parties should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Grp 17-5

The commenter asserts that the project's DEIR should have evaluated emissions against a net zero GHG threshold based on the 2017 Scoping Plan and statewide GHG reduction goals. The commenter's opinion that any project that results in GHGs above net zero should be considered significant is inconsistent with the statewide guidance, as described in the DEIR on page 4.3-29:

> The 2017 Scoping Plan further provides that "the inability of a project to mitigate its GHG emissions to net zero does not imply the project results in a substantial contribution to the cumulatively significant environmental impact of climate change under CEQA."

The lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial

evidence provided in the DEIR (please see Master Response 27 – GHG Thresholds). These thresholds are the metric used to determine if the project results in a substantial contribution to the cumulative GHG impact. Given that the project would result in GHG emissions below the applied construction threshold (after mitigation) and below the applied operational threshold (no mitigation required), and because the project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, the project would not result in a cumulatively considerable GHG impact.

Response to Comment Grp 17-6

The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 - Life Cycle GHG emissions. In addition, as stated on page 4.3-89 of the DEIR, the referenced Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and found to be consistent with the EAP. Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Grp 17-7

The commenter suggests that GHGs associated with the manufacture and transport of cement by third parties should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 - Life Cycle GHG emissions. Regarding quantity of cement required for the project, Portland cement use of 25 tons per day (5% cement content in cemented paste fill) is assumed, as disclosed on page 295 of Appendix E.1.

Response to Comment Grp 17-8

With regard to the validity of Mitigation Measure 4.3-7(b), which requires carbon offsets to reduce the project's construction emissions of GHG below the applicable threshold, please see Master Response 28 - Greenhouse Gas Credits.

The commenter does not provide explanation of how the GHG offset mitigation measure is impermissibly deferred without adequate performance standards. In fact, the GHG offset mitigation measure includes a section on "Reporting and Enforcement Standards" to ensure that the mitigation is feasibly enforced. Nonetheless, as shown in Master Response 28 - Mitigation Measure 4.3-7(b) has been revised in the Final EIR to further aid the County in enforcement of the mitigation measure, as currently set forth in the DEIR. The changes do not alter the conclusions of the DEIR.

Of note, CEQA Guidelines section 15097(a) allows lead agencies to delegate mitigation monitoring: "A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program." A GHG credit registry serves as the delegated entity. GHG offset credits recognized by a registry represent GHG emission reductions that *have already occurred in the past*; therefore, by purchasing an offset credit, the reduction in GHG emissions has been completed, and the impact has been mitigated.

GHG offset projects avoid, destruct, or sequester CO_2e emissions. GHG offsets projects may be subject to environmental review such as CEQA or NEPA; however, most GHG offset projects do not require environmental analysis as they do not result in adverse environmental impacts. For example, landfill gas destruction and beneficial use carbon offsets collect and combust landfill gas at an existing landfill and do not generate adverse environmental impacts. The commenter fails to provide any evidence that GHG offset projects result in foreseeable environmental impacts. Accordingly, no further response can be provided.

The commenter states that the DEIR fails to analyze additional feasible on-site mitigation for GHG emissions, but neglects to provide any recommendations for feasible mitigation. At this time, feasible construction GHG emissions mitigation is very limited given the state of technology and available GHG reduction strategies for offroad equipment and heavy-duty trucks. As the commenter does not provide onsite mitigation to be evaluated, no further response can be provided.

Response to Comment Grp 17-9

With regard to the validity of the Mitigation Measure 4.3-7(b), which requires carbon offsets to reduce the project's construction emissions of GHG below the applicable threshold, please see Master Response 28 - Greenhouse Gas Credits.

The commenter states that the operational GHG emissions are a significant and unavoidable impact and the associated GHG offset mitigation has various issues. However, as demonstrated in the DEIR, estimated operational GHG emissions are below the applied numeric threshold of 10,000 MT CO_2e per year. The DEIR determined that project-generated construction GHG emissions would exceed the applied GHG threshold of 1,100 MT CO2e per year, as addressed above. As such, the commenter incorrectly summarizes the draft GHG emissions analysis findings; instead, the project's operational GHG emissions are below the applied threshold of significance and is not the source of GHG emissions that was the basis of the less than significant with mitigation finding for threshold GHG-1.

Response to Comment Grp 17-10

The commenter states that the project would consume a substantial amount of electricity and would be inconsistent with the County EAP. Of note, projects that consume electricity do not necessarily conflict with the County energy reduction goals. Additionally, although the EAP is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D), the project was nevertheless determined to be consistent with the EAP (see Table 4.3-22 of the DEIR). Please see also Master Response 25 - Nevada County Energy Action Plan.

The commenter also asserts that "the DEIR must explain how the project intents to comply with the goals of the Nevada County Climate Action Plan". However, Nevada County has not adopted a Climate Action Plan.

Group Letter 18

NEVADA COUNTY DEMOCRATS

March 22, 2022

Dear Nevada County Planning Commissioners'

Grp 18-1 The Nevada County Democratic Central Committee passed a resolution opposing the reopening of the Idaho Maryland Mine. The local Democratic party has not been one to spend much time writing resolutions, but this proposal is too risky for the environment and public health to keep silent on it. Even if you accept the findings of the DEIR released on January 4th, Rise Gold Grass Valley's track record shows they cannot be trusted to implement the mitigation measures. They have a history of leaving waste to be cleaned up, had 35 charges filed against them in various courts, and a local bankruptcy judge, in evaluating the economic reports published by the company, thinks bankruptcy is likely."

Grp 18-2 Proponents of the mine often cite the possible 300 new jobs that could come with it. This job gain would likely be offset by the big risks for the tourism industry, high tech, and medical industry that won't be able to work in a situation where they are vibrations from underground blasting, the possible loss of hundreds of wells, and lowering of property values. However, right now Nevada County has more jobs available than workers, and very low housing stock.

Grp 18-3 The loading and dumping of rock would add tremendous pollution to the "F' Nevada County already earns from the American Lung Associations grading system due to the ozone in our air at times during the heat of the summer.

Grp 18-4 We could go on but we included the text of the resolution.

Sincerely,

Eric Robins
Chair, Nevada County Democrats
Office
1721 E Main Street, Ste.6
Grass Valley, CA 95945
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530-305-9223

Nevada County Democratic Central Committee

Resolution

Opposing Rise Gold's proposal to re-open the Idaho Maryland Mine

Grp 18-5 **Whereas,** the proposal by Rise Grass Valley, a subsidiary of Rise Gold Corp., for an 80 year, 7 day a week, 24 hour operation of mining machinery and trucking of mine materials will create negative impacts to the air quality, water quality, ambient light and noise levels far beyond the scope of what we believe the citizens of Nevada County can or should tolerate; and

Grp 18-6 **Whereas,** the proposal to open the mine has severely undercounted the number of private wells that will be impacted and potentially contaminated. Local well professionals estimate the number of affected parcels will be in the hundreds, not the handful identified by Rise Gold; and

Grp 18-7 **Whereas,** the potential economic losses to homeowners within the mineral rights area have been estimated to exceed $5 million in reduced market value, even rendering many homes unsellable; and

Grp 18-8 **Whereas,** the jobs Rise Gold purports to be creating to stimulate the local economy will need to be filled by outside labor, as Nevada County no longer has a pool of trained underground miners; and

Grp 18-9 **Whereas,** Nevada County and California suffer from a severe housing shortage both in rental and sale properties, leaving imported workers unhoused locally; and

Grp 18-10 **Whereas**, the proposed energy use of the mine would be in direct and fatal conflict with our county's existing Energy Action Plan (EAP), which was unanimously approved by the Nevada County Board of Supervisors in 2019, and which directs an urgent countywide decrease in energy use, Rise Gold's proposal actually doubles the county's annual non-residential energy consumption; and

Grp 18-11 **Whereas,** Rise Gold's promises to inject money into the local economy may sound attractive, but the Economic Policy Institute Brief cited by Rise Gold actually shows that other industries can produce far better job numbers than mining, including eight industries we already have in Nevada County today; and

Grp 18-12 **Whereas**, the CEO of Rise Gold, Ben Mossman, is currently awaiting a retrial on Canadian Environmental Rights Act and Fisheries Act violations allegedly committed by his former company, Banks Island Gold Ltd., at the Yellow Giant gold mine site in British Columbia. Banks Island Gold faces 35 provincial and federal charges after enforcement officers found evidence that they were dumping waste from the Yellow Giant gold mine into the surrounding woods and wetland in 2015, and Mr. Mossman, the responsible party as CEO, did not report any spills; and

Grp 18-13

Whereas, California Judge Randall J. Newsome has said, "My experience as a U.S bankruptcy judge for 28 years leads me to believe that this company, now Rise Grass Valley (a wholly owned subsidiary of Rise Gold) is destined for financial failure."

Now, Therefore, be it Resolved, that the above recitals are true and correct to the best of our knowledge and shall serve as findings of the Nevada County Democratic Central Committee.

Grp 18-14

Be it Further Resolved, that the Nevada County Democratic Central Committee calls upon the Nevada County Board of Supervisors to deny any and all permits for opening and operating the Brunswick/Idaho Maryland Mine, thereby protecting the citizens of Nevada County and our environment from the potential damages, losses and hardships this proposal will cause.

Be it Further Resolved, that the Nevada County Democratic Central Committee opposes the proposal to allow Rise Gold to open the Brunswick/Idaho Maryland Mine and further opposes Rise Gold to operate in Nevada County.

PASSED AND ADOPTED by the membership of the Nevada County Democratic Central Committee at its meeting held on the 18th Day of November, 2021.

References: www.MineWatchNC.org

www.mynevadacounty.com/documentcenter/view/35183
www.mynevadacounty.com/2882/Application-Documents---Rise-Grass-Valley

https://www.theunion.com/opinion/columns/randall-j-newsome-rise-gold-show-me-the-money/

https://www.todayinbc.com/news/court-assesses-15000-penalty-in-banks-island-mine-case/

https://www.cbc.ca/news/canada/british-columbia/b-c-s-high-court-upholds-new-trial-for-two-managers-after-spill-at-mine-1.5784666

GROUP LETTER 18: ERIC ROBINS, NEVADA COUNTY DEMOCRATIC CENTRAL COMMITTEE

Response to Comment Grp 18-1

The commenter states that its organization passed a resolution opposing the project. The commenter also states that even if the conclusions of the DEIR are accepted, the Project Applicant's CEO "cannot be trusted." The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Even though the Project Applicant's prior business dealings are not relevant to the adequacy of the DEIR, these types of comments are addressed in Master Response 3 – Operator Responsibility.

Response to Comment Grp 18-2

The commenter states that any economic gain to the community will be offset by environmental impacts, but does not offer any specifics as to why the DEIR is inadequate. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Grp 18-3

The commenter asserts that the placement, grading, and compaction of engineered fill would further degrade the community's poor air quality but does not assert any deficiency in the DEIR. The DEIR evaluates the project's potential air quality impacts in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and finds that impacts to air quality after mitigation would be less than significant.

Response to Comment Grp 18-4

The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 18-5

The commenter generally states that the project would create negative impacts to air quality, water quality, ambient light, and noise levels beyond the scope of what the community would tolerate. Please see Master Response 1. The DEIR identifies and evaluates each of the project's potential environmental impacts in accordance with CEQA. The commenter is referred to DEIR Chapter 4.1 (Aesthetics), Chapter 4.3 (Air Quality, Greenhouse Gas Emission, and Energy), Chapter 4.8 (Hydrology and Water Quality), and Chapter 4.10 (Noise and Vibration).

Response to Comment Grp 18-6

The commenter states that the DEIR underestimates the number of private wells that the project would impact and potentially contaminate. The commenter references "[l]ocal well professionals" but does not identify these individuals or the basis for their findings that the DEIR underestimates the number of wells impacted. The DEIR discusses the project's potential impacts on groundwater levels and recharge in Impact 4.8-2. (DEIR, p. 4.8-54–68.) The Impact 4.8-2 analysis is based on the groundwater modeling report prepared by Itasca Denver Inc. and peer reviewed by the County's independent expert West Yost Engineering (DEIR Appendix K.3). The DEIR describes the methodology used in the modeling. (DEIR, p. 4.8-36–37.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 18-7

The commenter states that the project would result in the cumulative loss of $5 million to nearby residential home values, but provides no basis for this finding. The commenter is referred to Master Response 2 – Social and Economic Issues.

Response to Comment Grp 18-8

The commenter states that the project will create demand for outside labor only because Nevada County does not have a pool of trained underground miners. While impacts to jobs are not an impact under CEQA, the DEIR establishes recruitment targets for local candidates with no previous mining experience, and will provide training for jobs at the project site. (DEIR, p. 4.9-26.) The DEIR estimates the project will create approximately 162 positions for local candidates with no previous mining experience and approximately 51 additional positions for candidates with some previous mining experience or other applicable trade experience. The commenter is also referred to Master Response 2 – Social and Economic Issues.

Response to Comment Grp 18-9

The commenter states that Nevada County and California suffers from a severe housing shortage which would leave any out-of-County workers unhoused. The DEIR evaluates the project's potential effects related to population growth and housing, which is provided in Chapter 4.9 (Land Use and Population and Housing). The DEIR specifically finds that the project would lead to indirect population growth by bringing approximately 312 persons to the area. (DEIR, p. 4.9-25.) Nevada County has 53,745 total housing units with a vacancy rate of 22.5 percent (12,098 vacant housing units.) (*Id*.) It is reasonably anticipated that the addition of 312 persons, as a result of the project, can be absorbed by the existing housing stock in Nevada County. (*Id.*)

Response to Comment Grp 18-10

The commenter states that project's proposed energy use would conflict with Nevada County's Energy Action Plan (EAP.) The commenter is referred to Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Grp 18-11

The commenter states that there are alternative projects that will yield better economic benefits to the region. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. The comment is noted for the decisionmakers.

Response to Comment Grp 18-12

The commenter discusses the CEO of the Project Applicant and his prior project in Canada. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility. The comment is noted for the decisionmakers.

Response to Comment Grp 18-13

The commenter discusses the opinion of the Honorable Judge Randall J. Newsome (Ret.) regarding the economic viability of the Project Applicant. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility. The comment is noted for the decisionmakers.

Response to Comment Grp 18-14

The commenter opposes the project and calls on the Nevada County Board of Supervisors to deny the Project Applicant any permits or approvals needed to reopen the Idaho-Maryland Mine. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Group Letter 19

Matt Kelley, Senior Planner

Nevada County Planning Department

950 Maidu Avenue, Suite 170 Nevada City, CA 95959-7902

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Email: Idaho.MMEIR@co.nevada.ca.us

April 4, 2022

Dear Matt Kelly, Nevada County Planning Commission and Board of Supervisors,

Grp 19-1

The Nevada County Food Policy Council (NCFPC) is a collaboration of 55+ agencies, organizations, businesses, farmers, ranchers and individuals with a mission to cultivate and promote a local, Whole-sum Food system (local and community-based, fair, ecologically sound and humane) that readily provides health and vitality to every member of our community; that protects, stewards, and regenerates our land and our natural resources; that serves and honors our local interests and creates wealth and prosperity for every link in the food chain; and more meaningfully connects us as humans with one another, with the land, its occupants and its cycles, and the bounty, creativity, and sacredness of life.

Community Alliance with Family Farmers (CAFF) is a statewide non-profit that has been providing technical assistance to family farmers across the state since 1978. CAFF's mission is to build sustainable food and farming systems through policy advocacy and on-the-ground programs to create more resilient family farms, communities, and ecosystems. We often partner with local organizations throughout the state, including Sierra Harvest and the NCFPC. CAFF has dozens of farmer members located within Nevada County. While we are a statewide organization, we strongly support the NCFPC and the comments in this document.

Grp 19-2

Our council and CAFF are deeply concerned that the impacts of this proposed mine would have detrimental effects on Nevada County agriculture and food production and that the issues listed in the DEIR haven't addressed our concerns listed below regarding water quality and water supply.

Grp 19-3

The NCFPC recently published a comprehensive assessment on current food system challenges and strengths. A food system encompasses all the stages of keeping us fed: growing, harvesting, packing, processing, transforming, marketing, consuming and composting or disposing of food.

It is estimated that Nevada County residents buy over $340 million in food annually. The value of food produced in the county is roughly $16 million, less than 5 percent of our annual purchases.

Local food production contributes to keeping our food dollars recirculating in our local economy, as well as creating tax revenues, increases food resilience, and meaningful jobs for our farmers and ranchers. From a health standpoint, local food purchases will likely equate to fresher, more nutritious, less processed foods. In addition, local food is transported from farms a shorter distance thus reducing fuel and refrigerant use, causing less pollution, packaging, and waste.

The study conducted in Central Oregon [Rahe 2017] found that $0.76 of every dollar spent on a local food product stays in the community compared to $0.28 of every dollar spent on food from outside the region. That means for every dollar you spend buying from your local farmer or rancher, an additional $0.48 is circulated through your local economy not only fueling jobs, but helping to make your community more resilient to external economic forces. Additionally, for every 5 farm jobs, an additional 2 off-farm jobs are created within the community.

Our locally produced food is a tiny part of our food market, leaving us vulnerable to a national food system that is fraying at the edges. Food can become unavailable, overpriced, and quality-compromised at any point. But our county has the water, land, and expertise to become more self-reliant.

Based on the 2020 Nevada County Agriculture Report https://www.mynevadacounty.com/ArchiveCenter/ViewFile/Item/1318,

Grp 19-4

"The 2020 COVID-19 pandemic highlighted the importance of our local food production as evident by empty produce shelves at national chain supermarkets during the beginning of this pandemic. Farmers that sold directly to restaurants were forced to quickly pivot and find other customers and many residents began growing their own vegetable garden. Throughout these uncertain times, our farmers fulfilled their role as essential workers and fed our community. The total value in 2020 of fruit and vegetable crops increased almost 7%, or $175,900. The total gross value of all agricultural commodities produced in 2020 was $19,725,200. Nevada County has in production 365 Farms with 3,313 acres of harvested cropland, 133,393 acres of grazing land and 7,760 acres of farmland," stated Chris de Njis, Nevada County Agricultural Commissioner.

Grp 19-5

The situation our agricultural system is facing due to drought is dire. New research shows California and the West are in a megadrought, the worst drought in 1,200 years. (CA Food and Farming Network, 2022). Our local farms and ranches rely on water to produce the food we consume.

It is imperative that we need to protect the water and land necessary to preserve our farm and ranchland that produce our local food and strengthen our local economy.

Specifically, we are concerned about the following 2 areas:

- **Downstream water quality**: How do you ensure that the downstream farms and ranches that have the South Fork of Wolf Creek running through their land continue to have excellent water quality? Their land may be certified Organic and cannot have high levels of chemicals or metals leaching into their soil affecting their crops or land used for grazing purposes of their livestock.

Grp 19-6

- **Adequate water supply with a mega drought forecasted.**

Downstream Water Quality Issue

In chapter 4.8.4, the DEIRstates that "only full treated water meeting the State's discharge requirements will be routed to the South Fork of Wolf Creek and will submit quarterly monitoring reports to the Regional Water Quality Control Board (RWQCB). "

Grp 19-7

- We recommend that there needs to be real time monitoring due to the high variability of water levels seasonally in the South Fork of Wolf Creek and not quarterly.
- We also recommend a local independent agent as oversight for the monitoring reports. Self-reporting holds a conflict of interest that does not align with the health of the watershed. Nonprofits such as the Sierra Fund, Sierra Streams, or Wolf Creek Community Alliance have the expertise to either perform the monitoring or ensure that the monitoring is done appropriately.

Grp 19-8

In chapter 4.8-1, "The treatment process would also reduce the concentrations of arsenic and ammonia, both of which have been detected in low concentrations in surface seeps near the mine."

Grp 19-9

- Is the water treatment process adequate to ensure that the arsenic levels never go above an unsafe level? If the water is being tested only quarterly, this issue might not be detected. According to a study completed in 2021 on the effect of arsenic-contaminated irrigation water on growth and elemental composition of tomato and cabbage cultivated in three different soils, and related health risks, "The Arsenic (As) threshold for drinking water is 10 µg/L (WHO, 2001), and for irrigation water is 100µg/L (FAO, 1994), but there is currently no recommended As limit value for vegetables." Again, we recommend that there needs to be real time, DAILY, water quality monitoring to ensure the downstream land holders of the South Fork of Wolf Creek have excellent water quality running through their land at all times, not just 4 times a year. Additionally, these reports need to be accessible to the public in real time so that any downstream users can monitor the situation themselves and be alert of an issue immediately and take necessary

Grp 19-10

actions to ensure their food production or grazing animals are safe and that their organic certifications are not in jeopardy.

Grp 19-11

- Is there a mitigation plan, in case the metals or other contaminant levels are detected above the allotted amount determined by the RWQCB? What is the mitigation plan?

Grp 19-12

- Is there a plan if the holding ponds have a break in the liner or berm and there is a flood allowing toxins to flow into the creek?

Grp 19-13

There also seems to be inadequate baseline mine water testing. The testing completed from the Brunswick shaft is inadequate in that it doesn't give enough data about the diversity of water quality within the vast underground sections containing old shafts and projected to have new exploration. Four current seeps emptying into Wolf Creek itself off Idaho-Maryland Road are probably more indicative. They contain high concentrations and greater numbers of heavy metals.

- Therefore, the DEIR needs additional study to create a better baseline for predicting the level of contamination in the mine groundwater. The results of that study need to be explicitly incorporated into water treatment design.

Grp 19-14

Adequate water supply

In Chapter 4.11 the DEIR states that "Water demand within Nevada Irrigation District's (NID) service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period. However, this mining project is not expected to exacerbate NID's water supply shortages during dry years and the project will supply water into South Fork Wolf Creek, and into the NID water conveyance system, at volumes exceeding the project water demand for potable water from NID that there is sufficient water supply available to serve the project during normal, dry and multiple dry years."

NID is in the early stages of a long-term visioning and planning effort to better understand potential future conditions and needs and identify management and operational practices to meet those needs. **In 2021, NID was barely able to meet the needs of the existing ag customers and at one point discussed cutting off all agricultural users in August.** This Plan for Water process will take a minimum of 2 years to complete. https://www.nidwater.com/plan-for-water. From the 2020 Agricultural Water Management Plan NID also states that they have roughly 5,600 agricultural customers. "***About ninety percent of all the water delivered by NID is for agricultural use giving life to approximately 32,000 acres of irrigated land in Nevada and Placer Counties.*** Most agricultural water customers purchase water seasonally, from mid-

April through mid-October. NID's raw water is conveyed to customers through a unique network of over 500 miles of canal. The ag water is used to grow multiple crops including wine grapes, nursery stock, apples, rice, plums, citrus, grass, alfalfa hay, as well as to irrigate pasture." https://www.nidwater.com/ag-urban-water-management-plans

Grp 19-15

- The data compiled in the DEIR thus far about water supply is extremely inadequate based on information about drought conditions in CA and the fact that NID has not completed its Plan for Water to determine its needs for its present customers for the next 50 years. Therefore, we recommend that more specific water analysis be completed AFTER the Plan for Water is completed by NID to ensure that there truly is enough water for the existing Nevada County agricultural users now and into the future.

Grp 19-16

- IF there truly is excess water supplied by the mining project into the South Fork of Wolf Creek, that water still does not assist any upstream users that may be without enough water during a drought year. Statements about water supply need to be stated as conditional and uncertain until the full Plan for Water by NID is completed. The DEIR should emphasize the uncertainty and unresolved nature of water supply and NOT state that there is enough water for the project.

Grp 19-17

- The following statement contradicts itself by implying that there is plenty of water available from NID, yet, you state that there isn't enough for 15 years for its own customers – if NID does not have enough for its customers, how can they have enough for this project? Please explain this in clearer terms. "Water demand within Nevada Irrigation District's (NID) service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period. However, this mining project is not expected to exacerbate NID's water supply shortages during dry years."

Grp 19-18

In Chapter 4.11, the DEIR states that "it is anticipated to receive potable water from Nevada Irrigation District (NID) for dust control, sanitary uses and reliable water supply to some nearby residences whose wells may be impacted by the mining operations." And Chapter 4.8 suggests that mine dewatering will impact only a few wells. Yet it only includes tests for a few wells and suggests that possibly up to 30 wells could be impacted. Previous studies suggested a larger area of impact.

- The DEIR states that NID would have more than adequate water to supply the 30 wells, but what if it's 100 wells? Therefore, we recommend a larger

and more comprehensive well study to be completed as well as new analysis of underground hydrology.

Grp 19-19

Based on what is not included in the DEIR regarding water supply, water quality and flooding possibilities, the impacts could be much more serious than suggested. Please carefully address these concerns and include the new areas of study or analysis needed to adequately assess the impacts of this project. Without these changes, the DEIR is severely flawed and inadequate.

Healthy food is critical to our lives. However, the future of our food supply is in jeopardy, threatened by erratic weather events, environmental degradation, drought and now a global pandemic. The COVID-19 pandemic pushed our fragile food system to the limit and supply for many products was disrupted. We must ensure that Nevada County has a thriving food supply system to weather future challenges. Please consider these issues when weighing the impacts of the proposed mine on the health and well-being of our Nevada County residents for the next 80 years and beyond!

Thank you for your consideration of our concerns.

The Nevada County Food Policy Council

Miriam Limov, Nevada County Food Policy Council Coordinator – miriam@sierraharvest.org

Jonathan Collier, Briarpatch Food Co-op Board of Director

Heidi Garrett, Small business owner, Nevada City

Deborah Gibbs, NC Climate Action Now Steering Committee

Bob Thurman, Interfaith Food Ministry Board President

Community Alliance with Family Farmers

Kali Feiereisel, Farmer Services Director – kali@caff.org

GROUP LETTER 19: MIRIAM LIMOV, NEVADA COUNTY FOOD POLICY COUNCIL COMMUNITY ALLIANCE WITH FAMILY FARMERS

Response to Comment Grp 19-1
This comment is introductory in nature. The comment is noted.

Response to Comment Grp 19-2
The commenter generally states that the DEIR does not address their concerns regarding water quality and water supply. Please see Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

Response to Comment Grp 19-3
The commenter provides a general discussion of the agricultural industry and its importance in Nevada County. The comment is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 19-4
The commenter highlights the importance of producing food locally, especially in light of the COVID-19 public health emergency. The comment is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 19-5
The commenter states that the local agricultural system is strained by the current drought and that water resources must be protected. The comment is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Grp 19-6
The commenter is concerned about downstream users the water quality of South Fork Wolf Creek and an adequate water supply in light of the drought. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 16 - Drought and Climate Change.

Response to Comment Grp 19-7
The commenter requests that water quality monitoring of South Fork Wolf Creek be conducted in real time. Monitoring will be done in accordance with the approved Notice of Intent and requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 19-8
Monitoring would be done in accordance with the approved Notice of Intent and requirements and oversight of the Central Valley Regional Water Quality Control Board. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 19-9
The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. Effluent limitations in the treated water that will be discharged into South Fork Wolf Creek are set by the Central Valley Regional Water Quality Control Board through its permitting, with which the project

will be required to comply, as verified and monitored by said state agency. Please refer to Chapter 4.8 of the DEIR for additional detail (cf. Table 4.8-2).

Response to Comment Grp 19-10

The commenter reiterates its request for daily water quality monitoring of South Fork Wolf Creek and requests the monitoring data be publicly available. Monitoring will be done in accordance with the approved Notice of Intent and requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 19-11

The commenter asks if there is a mitigation plan in place to address any contaminants that exceed RWQCB thresholds. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 to this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Grp 19-12

The commenter is concerned that the wastewater treatment pond may fail and asks if there is a contingency plan in the event of such failure. The geotechnical stability of the treatment pond is analyzed in Chapter 4.6 of the DEIR and required mitigations would reduce the impact to a less than significant level. (DEIR, p. 4.6-41.) The commenter is also referred to Appendix H.1 of the DEIR. Failure of the water treatment plant is speculative and is not required to be analyzed under CEQA.

Response to Comment Grp 19-13

The commenter states that the DEIR's analysis of the water in the mine is inadequate. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment 19-14

The commenter is concerned about drought and NID's ability to meet future water demands. The commenter is referred to Master Response 16 - Drought and Climate Change, and the following responses to more specific comments.

Response to Comment Grp 19-15

The commenter states that the DEIR's analysis of water supply is inadequate. The commenter is referred to Master Response 16 - Drought and Climate Change and Appendix N (Water Supply Assessment) of the DEIR.

Response to Comment Grp 19-16

The commenter states that the added water supply to South Fork Wolf Creek does not benefit any upstream users. As stated on page 4.11-37 of the DEIR, the possibility exists for NID to utilize the excess treated mine water discharged to South Fork Wolf Creek. If desired, NID could adjust its flows upstream to use the extra water available downstream.

Response to Comment Grp 19-17

The commenter states that the language from Appendix N (Water Supply Assessment) is inconsistent in that it states water demand would exceed NID supplies in dry years but that the project would not exacerbate NID's water supply shortage during dry years. This statement is

made in part based on the fact that, as discussed in the WSA (page 2), the potable water demands for buildout of the proposed project are already included in the District's projected 2040 water demands. In addition, as stated on page 4.11-37 of the DEIR, notwithstanding the potable demand of 26.4 acre-feet per year associated with the project, the project would be a net contributor of water to the NID water system as a result of the project's ongoing discharge of treated mine dewatering water to South Fork Wolf Creek (850 gpm or about 1,371 ac-ft/yr). The possibility exists for NID to utilize the excess treated mine water discharged to South Fork Wolf Creek. If desired, NID could adjust its flows upstream to use the extra water available downstream. The commenter is also referred to Master Response 16 - Drought and Climate Change.

Response to Comment Grp 19-18

The commenter states that the DEIR underestimates the number of potentially impacted private wells. The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 19-19

The commenter summarizes its primary concerns with project stated throughout the letter. Responses to specific concerns with the project are provide above. The commenter's opposition to the project is noted for the decisionmakers (please see Master Response 1).

Group Letter 20

RUDDER LAW GROUP
NAVIGATING THROUGH ENVIRONMENTAL REGULATION
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April 4, 2022

Re: Idaho-Maryland Mine DEIR Comment Letter

Dear Mr. Kelley:

I appreciate the opportunity to share my grave concerns regarding the Draft Environmental Impact Report ("DEIR") for the Idaho-Maryland Mine Project ("Project") from the perspective both as a land use and natural resources attorney for over two decades and a resident of Grass Valley. Based on an extensive review of the DEIR, it is clear that the DEIR must be revised and recirculated to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq., for the reasons outlined below.

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An EIR is required to correctly inform the public and trustee and responsible agencies of all potential environmental impacts of a proposed action, to list ways in which the significant effects of such a project might be minimized, and to indicate alternatives to address impacts that cannot be mitigated. (CA Pub. Res. Code § 21061.) Unfortunately, the DEIR fails on all three requirements. First and foremost, the DEIR fails to accurately describe the Project and all potentially significant impacts. In particular, it fails to identify potentially significant and unavoidable biological, hazards, air quality, and hydrological impacts that may not be mitigated. Second, the DEIR fails to identify feasible and achievable mitigation measures to minimize such impacts to less than significant levels. And finally, this DEIR fails to identify alternatives to address the potentially significant impacts identified in the report. The DEIR deprives the public of a meaningful opportunity to comment upon substantial environmental impacts of the project and fails to identify feasible mitigation measures for such effect, and accordingly, requires recirculation a revised DEIR. (CEQA Guidelines § 15088.5(a)(4).)

1. The Project Description is Inadequate Under CEQA

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The Project Description in the DEIR is inadequate under CEQA because it fails to include the cleanup of the Centennial Site, which is an integral component of the Project. In doing so, the DEIR fails to provide the public with an accurate accounting of all Project impacts, including potentially significant and unavoidable biological, hydrological, hazards, air quality and cumulative impacts.

California courts make it clear that ""The scope of the environmental review conducted for the initial study must include the entire project." (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222) *Nelson v. County of Kern*, 190 Cal.App.4th 252, 267 (Cal. Ct. App. 2010) A project is defined under CEQA to include "*the whole of an action*, including everything that has a potential to result in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment and which is undertaken, supported or approved by a public agency. (CEQA Guidelines, § 15378(a), italics added.)

CEQA Guidelines further clarifies that the term "project" refers to "the activity which is being approved and which *may be subject to several discretionary approvals by governmental agencies*. The term 'project' does not mean each separate governmental approval." (CEQA Guidelines, § 15378 (c), italics added.) This definition "ensure[s] that a project proponent does not file separate environmental reports for the same project to different agencies thereby preventing 'consideration of the cumulative impact on the environment. . . .' [Citation.]" (*Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1190, fn. 5, quoting *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1452; *Nelson*, 190 Cal.App.4th at 271.)

CEQA's conception of a project is applied broadly "to maximize protection of the environment" to "prevent a proponent or a public agency from avoiding CEQA requirements by dividing a project into smaller components which, when considered separately, may not have a significant environmental effect." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730, *Nelson*, 190 Cal.App.4th at 271. Unfortunately, the DEIR does exactly this by segmenting out the Centennial cleanup from this Project rationalizing that such remediation efforts are being reviewed and approved by another agency, the Department of Toxic and Substance Control ("DTSC").

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The Notice of Preparation ("NOP") for the Project originally identified the Centennial cleanup an essential "part of the proposed project." (NOP, p.7) and confirmed for the public that the cleanup would be reviewed as part of this CEQA document. The NOP is required to provide "sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response." (CEQA Guidelines, 14 CCR § 15082(a)(1).) The resulting Project description in the DEIR should never be smaller than the scope identified in the NOP. To the extent that the County wanted to reduce the scope of the Project so significantly as to remove an extensive cleanup effort at the Centennial Site, the County should have issued a revised NOP and received feedback from both the public and responsible agencies on this revised approach. It did not.

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Moreover, Centennial cleanup is an essential part of the stated Project Objectives in the DEIR. Two of the ten project objectives are directly tied to the cleanup of Centennial. (DEIR, p. 3-11-3-12.)

- Increase the usable land area at the Centennial Industrial Site to allow its future use as industrial land.
- Minimize impacts to wetlands, vernal pools, and other special-status species habitat located on the Brunswick and Centennial Industrial sites, and, to the extent feasible, mitigate any such impacts identified.

California courts make it clear that if a component is dependent upon and closely related to an objective of the project, it must be included. See *Tuolumne County Citizens* at pp. 1225-1231 [where the success of the overall objective depends on the inclusion of certain action, the distinct actions are viewed as parts of a larger whole — the same project].)" *Nelson v. County*

of Kern, 190 Cal.App.4th 252, 272. Here, the success of these two objectives depend on the remediation of the Centennial Site, and accordingly, it must be included as part of the same Project.

The County acknowledges throughout the DEIR that actual impacts are dependent on the design of the Centennial cleanup (DEIR, p. 1-6, 4.0-2, 4.1-2, 4.2-1, 4.4-2, etc.) and that such designs have not yet been approved (DEIR, p. 3-10), but then fails to include such work as part of the Project. The Project will result in impacts to over 44 acres of the Centennial Site, which may or may not be on top of an engineered cap post cleanup or pristine wetlands, depending upon the outcome of the DTSC process. To suggest that these two projects have independent utility and do not impact one another, defies logic and results in an analysis that does not comply with CEQA requirements.

The Water Board agreed with this analysis and requested that the Centennial cleanup be analyzed with the Idaho-Maryland Mine as part of its comment letter to DTSC on the IS/MND for the Centennial cleanup. The Water Board stated that

> the cumulative impacts to water quality incurred by the project described in the RAP and potential future discharge of mine waste generated by the proposed Idaho-Maryland Mine-Rise Grass Valley project **should be considered in a single environmental document**. This seems particularly relevant considering the potential use of the Centennial Property for management and reuse of mine waste generated by the proposed Idaho-Maryland Mine-Rise Grass Valley project.

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(*Water Board Comment Letter to DTSC on the Centennial IS/MND*, September 24, 2021, p. 5, included as Attachment A hereto.) The Water Board concluded that because the two projects have been separated "staff are unable to assess the cumulative impacts to water quality or whether the existing environmental document prepared for the RAP is adequate to support future WDRs for Waters of the State (see Permitting Requirement 2)." (Id.) In other words, as a result of separating out the two projects, the Water Board is currently unable to rely on the IS/MND to issue permits for the Centennial cleanup.

The Centennial cleanup is an integral part of the Project, as referenced in the NOP and the Project objectives, and must be analyzed in this DEIR to provide the public with an accurate picture of all potential impacts associated with the Project. The Centennial cleanup must be added to the analysis and the DEIR must be recirculated.

2. CEQA Does Not Allow Use of a Future Baseline That May or May Not Happen

The inconsistent treatment of the Centennial cleanup not only leads to an inaccurate Project description, but violates the CEQA Guidelines related to the environmental baseline and analysis of impacts. CEQA Guidelines require the DEIR to describe physical environmental conditions as they exist at the time the notice of preparation ("NOP") is published in order "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." (CEQA Guidelines § 15125(a).) The existing conditions at the time of the NOP (July 17, 2020), reflect a Centennial Site contaminated enough to be considered a superfund site in need of remediation of existing mine waste including contaminants that cause a significant risk to human health like arsenic, lead, thallium, mercury, and other metals (DEIR, p. 4.7-3). According to the Water Board, these metals and contaminants "present a potential human health risk resulting from routine, long-term exposures including ingestion, inhalation of dust or vapors, and dermal contact. In

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addition, contaminated mine waste presents potential risks to ecological health and water quality." (*Water Board Comment Letter*, p. 1, Attachment A.) As indicated in the DEIR, such cleanup must be addressed to protect the health of the community and to allow any future uses on the site, including the placement of mine waste. (DEIR p. 3-10.)

Unfortunately, the DEIR does not identify the existing contaminated site as part of the environmental baseline for purposes calculating impacts. Instead, the DEIR assumes that the Centennial remediation has been fully completed by the start of the Project and applies anticipated conceptual future conditions to complete the analysis of aesthetic impacts, agriculture, biological resources, hazards and hazardous materials, and wildfire risk. (DEIR, pp. 1-6 to 1-7.) Not only is this approach inconsistent with CEQA, but it is not supported by substantial evidence in the record.

The Centennial cleanup *may* happen as the result of a Voluntary Agreement that involves Rise Gold working with DTSC to prepare a draft and then a future final Remedial Action Plan ("RAP") describing the methods for remediating the Centennial Site. Each remediation approach results in varying levels of ground disturbance, depending upon how much contaminated soil is removed from the site and how much is placed onsite on existing wetlands and sensitive resources. The RAP describes the various remedial alternatives and then ultimately, DTSC will select one that reduces the risks associated with environmental conditions identified at the Site. The RAP also outlines procedures for excavation, on-site treatment, and consolidation of mining waste as engineered fill in an area that will be subject to land use controls at the Site. The remedial alternative will be selected based on its effectiveness, feasibility, and cost as part of a Final RAP, which has not yet been developed.

The draft RAP along with an Initial Study/Mitigated Negative Declaration ("IS/MND") for the cleanup work are currently out for public review. DTSC has <u>not yet selected a preferred remedial alternative</u> which means that the exact level of ground disturbance associated with the Centennial cleanup is not yet known. The latest communication with the DTSC project manager for the Centennial cleanup highlights just how far off the decision is at this point. In response to a request for a status update regarding the Final RAP, Dean Wright, the Project Manager at DTSC in charge of the Centennial cleanup said "I've almost given up anticipating a decision on the Centennial M-1 RAP. Typically, the RAP review and especially CEQA reviews are where project schedules can go off the rails and that has certainly happened in this case." (Email communication from Dean Wright, March 21, 2022, italics added.) While DTSC anticipates finalizing a remedial alternative soon, there is no clarity on which remedial alternative will be selected and when work would actually begin.

After the Final RAP is provided for public review, the applicant is then required to produce a more detailed Remedial Design Implementation Plan ("RDIP") with additional design details, which also could affect the footprint of ground disturbance at the Centennial site.

The DEIR cannot rely on the draft RAP that is still under review by DTSC as substantial evidence of likely future conditions because such decisions have yet to be made. DTSC may ultimately not approve the RAP as proposed and require an entirely different design based on public input. Accordingly, speculating on the specific levels of disturbance associated with the cleanup in the DEIR would be inaccurate, misleading, and not supported by substantial evidence because they are still under review and may change significantly.

As just one example, the draft RAP proposes to potentially impact almost five acres of existing wetlands on the Centennial site, but several commenters have asked DTSC to revise the approach to reduce the level of impacts on wetlands, which would significantly change the ground conditions post remediation and significantly alter the resulting impacts from placement of mine waste from the Idaho-Maryland Mine.

Moreover, as acknowledged in the DEIR, it's possible that the remediation may never occur (DEIR, p. 3-26). Accordingly, the use of conceptual future baseline conditions that have not been approved and may never take place is wholly inappropriate for calculating environmental impacts associated with this Project.

CEQA Guidelines only grant authority to change the environmental baseline from existing physical conditions in very limited circumstances. Where absolutely necessary to provide the *most accurate picture practically possible of the project's impacts*, a lead agency may define existing conditions by referencing historic conditions, or conditions expected *when the project becomes operational*, or both, that are supported with substantial evidence. (CEQA Guidelines § 15125(a)(1).) Here, there is insufficient evidence to confirm that the cleanup will be remediated, much less by the time the Project becomes operational. Indeed, the County is so unsure of the potential future conditions of the Centennial cleanup, and the timing thereof, that the DEIR includes an alternative (Alternative #2) design that could become necessary if the Centennial cleanup is never completed. This approach completely undermines the DEIR assertion that there is substantial evidence supporting the assumption that Centennial cleanup will be completed when the Project becomes operational. The County cannot have it both ways. Either the Centennial cleanup *is certain* enough to be expected to be in place when the Project becomes operational *OR uncertain* enough as to require a separate alternative excluding use of the site. It cannot be both. Given the questionable timeline of DTSC's approval process, the responsible and appropriate approach would be to describe the existing environmental baseline at the time of the NOP, without any remediation of the Centennial Site, to get an accurate picture of all Project impacts.

The brief discussion in the DEIR ostensibly supporting the wholly unique baseline approach (pp. 1-3-1-7) suggests that the DEIR is not using a projected future baseline, which is false. The DEIR acknowledges that Centennial cleanup may not occur until after Project operations have begun (DEIR p. 3-26), which means the DEIR must meet the strict legal standard for using a future baseline, which it does not. The CEQA Guidelines limit use of such a future speculative baseline to those instances in which the DEIR "demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record." (CEQA Guidelines § 15125(a)(2).)

The DEIR does not provide any evidence to suggest that assumption of the Centennial site is necessary to avoid misleading the decision-makers or the public. On the contrary, the use of the future conceptual baseline that may or may not happen prior to Project operations results in a very misleading analysis of impacts that fails to identify all potential and likely impacts of the Project at the Centennial location. As described above, such projections are not supported by substantial evidence. On the contrary, the substantial evidence in the record in the DEIR, the Water Board's Comment Letter, and the DTSC Draft RAP, suggest that the Centennial remedial design has not yet been selected and could change significantly. It is far from a reliable projection. Accordingly, the DEIR must be revised and recirculated to identify the existing physical conditions of the Centennial Site and to provide a comprehensive analysis of impacts to give both the public and decision-makers an accurate picture of all potential impacts.

CEQA prohibits such assumptions of Project approval before DTSC has completed its review and requires the DEIR to identify existing environmental conditions, not a future baseline based on speculation. CEQA strictly prohibits the use of a future baseline, particularly when projections are unreliable and not supported by substantial evidence in the record.

The DEIR selectively uses a future baseline for certain resource areas that result in an underestimation of potential impacts, which is prohibited under CEQA. The last thing the County should be doing for a Project that could cause 80-years of community impacts is underestimating potential issues to expedite approval. While the DEIR sites all of the aspects of the Centennial Site, never does it provide clear substantial evidence to support the assumption that Centennial will be cleaned up in a certain way, and certainly should not make such assumptions before DTSC has completed its CEQA and approval process.

To protect the County from legal challenge, the DEIR must be revised to address existing conditions on the unremediated Centennial Site and be recirculated to provide the public and decision makers with an accurate picture of all potential impacts.

3. Inconsistent Approach Leads to Undercounting of Impacts Violating CEQA

Grp 20-7

The DEIR must be revised and recirculated to address the various flaws in the analysis that result from assuming the Centennial cleanup as part of the baseline. In particular, the failure to adequately address the Centennial cleanup leads to flaws in the biological, hazards, geology, aesthetics, and cumulative impact analysis among other resource areas.

a. Undercounting of Biological Impacts In Connection with Centennial

The DEIR arbitrarily assumes the level of biological impacts associated with the Project will be less than significant because it assumes that the Centennial cleanup, which has not yet been approved (and has been challenged by the public) will be completed before Project construction. As described above, this assumption is not supported by substantial evidence, and even if it were, the DEIR cannot rely on a remedial design that has not yet been selected or approved by DTSC. The DEIR acknowledges that potential biological impacts would vary significantly depending on the remedial design chosen for the Centennial cleanup. (DEIR, p. 2-2.) The DEIR also describes the Centennial cleanup inconsistently stated that the remediation may impact some amount up to 28 acres chapter two, but then assuming that all 28 acres will be disturbed in certain sections (DEIR, p. 4.4-2.) The DEIR is riddled with these kinds of inconsistencies that must be addressed in a revised DEIR.

Grp 20-8

In the biology chapter, the DEIR acknowledges that the exact number of impacts from Centennial "cannot be precisely established for the baseline condition" because DTSC has not approved the Final RAP (DEIR, p. 4.4-3), but then includes a map identifying a massive whole in the center concluding that this entire area will be impacted by the Centennial cleanup. (Figure 4.4-1, p. 4.4-4.) This map is not supported by substantial evidence and provides the public with a misleading impression that this entire area will be wiped clean of all environmental resources prior to Project implementation, including four acres of existing wetlands and other sensitive habitat, when this design has not been approved by DTSC. Using such an approach, conveniently cuts out over four acres of potential impacts to wetlands and leads the DEIR to conclude that biological impacts will be less than significant.

As shown in the DTSC IS/MND, most of the 'blank' area on Figure 4.4-1 is currently home to a variety of sensitive resources including wetlands, and a large number of commenters have asked DTSC to revise the RAP to avoid these resources, which would significantly alter the footprint of this 'disturbed area' and thereby significantly change the number of impacts that the mine waste would cause. As a result of the DEIR's assumption, the estimated impacts go from 5 acres of permanent impacts to wetlands down to 0.03 acres. This is a gross underestimate of existing conditions and likely biological impacts at Centennial from the Project. The result is a significant undercounting of wetland impacts resulting in an inappropriate conclusion of less than significant impacts. When impacts are speculative or

unknown, the DEIR must conservatively assume the most impacting result, which here, would involve placement of mine waste on the existing 4-5 acres of wetlands. This should be identified as a significant impact that requires at the very least, a one to one mitigation ratio for wetlands.

Given the speculative nature of the analysis and the likelihood that the Centennial cleanup design will change, biological impacts should be assumed to be significant and unavoidable. The goal of CEQA is to conservatively identify, in an accurate, transparent, and user-friendly way, ALL of the potentially significant impacts associated with the Project, which very easily could include several additional biological and hazardous materials impacts if DTSC chooses a different alternative for the Centennial clean up.

Accordingly, the DEIR must incorporate the Centennial cleanup to provide a clear and accurate picture of impacts and identify this impact as potentially significant.

b. Geology Analysis is Flawed Based on the Centennial Approach

Moreover, the vegetated communities post remediation are not handled consistently throughout the document leading to an undercounting of geological impacts. For example, the DEIR assumes that approximately half of the Centennial Site will have been disturbed by the remediation, leading to a much smaller footprint of impacts associated with the subsequent engineered fill and placement of mine waste. But the opposite is anticipated in the geology chapter. In the geology analysis, the DEIR assumes that the erosion concerns associated with future mine waste will be avoided because the area will be revegetated after remediation in accordance with DTSC oversight pursuant to the Final RAP. (DEIR, p. 4.6-35.) The DEIR assumes in the biology analysis the vegetated areas will be gone – thereby avoiding significant impacts to special status species habitat, but for geology, the area will be revegetated to avoid erosion. The DEIR cannot have it both ways. The remediated Centennial Site will either be revegetated and address erosion, thereby resulting in additional biological impacts from the placement of new mine waste OR the area will remain disturbed and therefore must be identified as a geological impact. This is just one example of the flawed analysis that results from the inconsistent use of the Centennial cleanup as part of the baseline and highlights why the cleanup must be part of the Project, incorporated into all impact areas, and the DEIR must be recirculated. The current draft simply does not provide the public or decision-makers with an accurate picture of impacts.

Grp 20-9

c. Hazard Impacts Are Undercounted As a Result of Centennial

Similar to biology, the DEIR assumes that all contamination at the Centennial Site will be magically cleaned up by the start of Project impacts and thereby concludes that potential contaminants "do not exist under the adjusted baseline condition." (DEIR, p.4.7-3.) The approach avoids any analysis of the various remedial designs being considered in the draft RAP and undercounts any potential remaining contamination that could be impacted by the placement of additional mine waste and construction efforts. As described above, the ultimate remedial action does not guarantee that all contaminants will be removed as the design will be chosen based on feasibility, implementability, and cost, and may not address all contaminants. The DEIR must conservatively assume that some contaminants may remain at Centennial that could be impacted by the placement of additional mine waste. Once again, the DEIR has used the creative future baseline to magically erase potentially significant impacts associated with hazards that could pose a significant risk to health and human life.

Grp 20-10

The Centennial Site is a superfund site that only avoided formal designations as a result of the Voluntary Cleanup Agreement agreed to by Rise Gold; however, the site remains significantly contaminated. These existing conditions cannot be glossed over in the DEIR, and the hazards

section must conservatively analyze potential additional impacts of placing mine waste on an area that has not been fully remediated. Indeed, all substantial evidence suggests that the RAP has not been completed, has not been shared with the public, and may not address all potential and future contaminants that could exist at the site post cleanup.

d. Cumulative Impacts Are Underestimated As a Result of Centennial

Grp 20-11

Perhaps the most egregious issue with the Centennial baseline approach is the resulting Cumulative Impact analysis, which inconceivably fails to include Centennial cleanup one of the projects that must be viewed cumulatively with other Projects to conservatively identify all cumulative impacts. CEQA defines "Cumulative impacts" as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (CEQA Guidelines §15355.) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the Project when added to other closely related *past, present, and reasonably foreseeable probable future projects*. If not included as part of the Project, the Centennial cleanup should at the very least be included in the cumulatives analysis to give the public an accurate picture of all potential impacts occurring at the Centennial Site, including air quality and traffic impacts from truck hauling, hazard impacts from contaminant exposure, etc. Yet, incredulously, the cumulative projects list does not include the Centennial cleanup, which is – depending upon how you look at it- either a past, present, or future project that will cause cumulative impacts when considered with this Project. In removing the Centennial cleanup from this critical part of the analysis, the DEIR avoids identifying potentially significant and unavoidable cumulative biological, air quality impacts, hazards, geological, aesthetics, among others. This section must be revised to include the Centennial Site and to identify potentially significant cumulative impacts.

By excluding the Centennial cleanup work from the Project and from the analysis, the DEIR woefully undercounts cumulative impacts and fails to provide the public with an accurate accounting of likely Project impacts. This section must be revised and the DEIR must be recirculated.

4. Biological Analysis is Flawed

In addition to the above, the biological analysis must be revised to address the following flaws in the analysis:

Grp 20-12

a. Pinehill Flatbush

The DEIR identifies potentially significant impacts to the Pinehill Flatbush on the Centennial site, but cannot possibly know the exact level of potential impacts without first confirming the design of the Centennial clean up. (DEIR, p. 2-37). The County makes an assumption that the clean-up will impact 28 acres, but also admits that such numbers may be different if DTSC chooses a different clean up alternative. (DEIR, p. 2-2) Again, highlighting the failures of the analysis. There are significant populations of this plant species that must be adequately analyzed and protected by incorporating the Centennial cleanup.

b. Foothill Yellow-Legged Frog (FYLF)

Grp 20-13

The FYLF frog is state listed under the California Endangered Species Act ("CESA") and was proposed to be listed as endangered under the Federal Endangered Species Act ("FESA") on December 28, 2021 (86 FR 73914, December 28, 2021). The DEIR identifies potentially significant impacts to this species, which impacts are, as described above, not correctly quantified as a result of the Centennial baseline issue, and may be far more significant than currently

described. Any impacts to a CESA listed species will require Section 2081 Permit from the California Department of Fish and Wildlife ("CDFW") prior to construction, and may require an Incidental Take Permit under the FESA from the US Fish and Wildlife Service ("USFWS") if the proposed rule becomes final. Rather than require that the applicant consult with the CDFW and USFWS now to ensure protection of this endangered species, the DEIR fails to mitigate this risk and requires agency consultation only after construction starts. (See DEIR, Mitigation Measure 4.4-2(a).) At this point, the Project would be underway, and it may be too late for Rise Gold to obtain either a Section 2081 Permit from CDFW or an ITP from the USFWS. Indeed, there is no guarantee that such permits would be granted by either CDFW or the USFWS.

Section 2081 Permits regularly take 1-3 years to obtain. Mitigation Measure 4.4-2(a) must be revised to require Rise to consult with both CDFW and USFWS prior to the start of construction to obtain any necessary take permits for the FYLF. In the alternative, the mitigation measure must require Rise to halt all construction if and when the species is found until Rise has obtained an ITP or 2081 Permit for the species. The DEIR cannot assume that CDFW would issue such a permit as such authorizations are completely discretionary and regularly denied. Accordingly, such impacts must be mitigated up front to reach a less than significant conclusion or identified as potentially significant and unavoidable.

The failure of the DEIR to include such protective measures, which are regularly required by CDFW as a responsible and trustee agency under CEQA, raises the issue of whether CDFW was appropriately consulted in the preparation of this DEIR as required under CEQA to ensure that the proposed mitigation measures are viable. (*See SCVWater District v SFRWQCB* 59 Cal.App.5th 199 2020.) Any mitigation measure that requires input and approval from CDFW, should involve direct consultation between CDFW and the County before finalizing the CEQA document.

Accordingly, we respectfully ask for clarification in the response to comments document clarifying the consultation with CDFW in the preparation of this DEIR.

c. California Red-Legged Frog (CRLF)

Grp 20-14

The CRLF is a federally listed endangered species that may be significantly impacted by this Project, but the DEIR offers only deferred mitigation to ensure its protection. (DEIR, MM 4.4-2(c), p.2-41.) Similar to the YLF, the DEIR cannot cross its fingers and hope that the species is not there, only then require consultation with the USFWS after the fact. The DEIR must identify any potential impacts to federally listed species as potentially significant, must require the applicant to consult with USFWS, identify impacts, and complete Section 7 or Section 10 consultation to ensure that impacts to RLF are mitigated to less than significant levels. Without such assurances, the DEIR should identify these impacts as significant and unavoidable.

d. California Black Rail (CBR)

Grp 20-15

The California Black Rail is not only state-listed as threatened, but is also a fully protected species under the California Department of Fish and Game Code. Fully protected species cannot, under any circumstances, be taken or impacted without violating state law. No permits can be given by CDFW to impact fully protected species. The DEIR incorrectly suggests that if a CBR is identified, Rise can obtain a take permit from CDFW for this species. (See DEIR, MM 4.4-2(d).) CDFW cannot grant any take permits for fully protected species. Accordingly, MM 4.4-2(d) is not feasible and must be revised. Had the County consulted with CDFW prior to issuing the DEIR, CDFW would have clarified such issues and ensured feasible mitigation. The Project must be designed to to avoid all impacts to fully protected species such as the CBR. Not only should CDFW weigh in on potential impacts as both a trustee and responsible agency under CEQA, but the County must revise the determination to call out this impact as potentially significant and unavoidable.

Moreover, the impacts to the CBR and other bird species must be revised to analyze the potential long-lasting impacts to sensitive species habitats from long-term vibration and noise from the 80-year operation of the mine, including mine blasting, truck trips, hauling mine waste, etc. Such noise impacts have been known to cause long-term harassment of bird species.

e. Biological Impacts Should be Identified as Significant and Potentially Unavoidable.

Grp 20-16

Given the unknown impacts associated with the Centennial cleanup, the potential for take of state and federally listed species, and the potential for impacts to fully protected species that cannot be authorized by permit, such impacts should be identified as significant and potentially unavoidable.

5. Air Quality Analysis is Flawed

Many others in the community have provided detailed comments on the air quality analysis that we support, including the Baseline Environmental Consulting Report, February 15, 2022, included with comments from Shute, Mihaly, and Weinberger, March 30, 2022, which we will not restate here, but fully support.

Grp 20-17

The air quality analysis fails to include the significant impacts associated with the Centennial cleanup, and must be revised for that reason alone. In addition, the air quality, greenhouse gas and energy use analysis must be revised to address a more accurate project timeline. The Project description suggests a construction timeline of 18 months. (DEIR at 3-37.) But, the DEIR's air quality analysis assumes that Project construction would last for only 12 months, and bases its impact evaluation on that assumption. (DEIR, pps. 4.3-44 to 4.3-46, 4.3-66 to 4.3-67, 4.3-74. Moreover, the DEIR fails to address significant air quality emissions from operation of the mine for the next 80 years, including emissions of criteria air pollutants that must be mitigated. The DEIR currently relies on mitigation offsets that lack performance standards and therefore cannot be relied upon to mitigate significant impacts to less than significant levels. Moreover, the DEIR relies on mitigation measure 4.3-1(b) which requires Tier 4 engines to reduce significant emissions when 'commercially reasonable' which is defined vaguely to mean 'available taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites.' With language this vague, the applicant can claim that tier 4 engines are not 'commercially available', leaving this impact unmitigated. Tier 3 engines will not be sufficient to mitigate this impact to less than significant levels, as a result this impact should be identified as potentially significant and unavoidable.

6. Hydrology Analysis is Flawed

Many experts in the community have highlighted significant concerns with the hydrological analysis (see Baseline Report referenced above), which comments we fully support. In addition, we highlight the following major concerns with the hydrology analysis.

Grp 20-18

a. Analysis of 31 wells is a gross underestimate.

The DEIR concludes that the significant discharges, hydromorphology, and dewatering (of at least 300 wells) associated with this Project can be mitigated to less than significant levels, mostly by relying on general permits issued by the Water Board and using insufficient modeling data (DEIR, p. 2-78.) In 1996, the County approved a much smaller project at the mine for only 5 years that was estimated to impact 101 wells. The DEIR and the Water Supply Assessment ("WSA") for the

Project conclude, with no evidence to contradict the County's previous studies, that the much larger mine Project – which will continually pump 2,500 gallons per minute for the first 6 months, 850 gallons per minute over the next 80 years – will impact only 7 wells, at most 31. Experts in the community have reviewed the hydrology report that supports the WSA, and have identified extensive errors, including issues with the groundwater modeling and underlying assumptions. (See Baseline Report for additional details.)

Grp 20-19

During its public meeting to review the WSA on February 9, 2022, the Nevada Irrigation District ("NID") the agency responsible for providing additional hookups to residents that lose their well water supply highlighted their concern about the veracity of these conclusions and subsequently asked the Planning Commission on March 24, 2022, to revise the DEIR to require Rise to provide a security bond of up to approximately $14 million to support likely future hookups that likely will be required as a result of this Project's impacts to groundwater wells. This requested mitigation measure from the expert agency on water supply should be incorporated, and this should be identified as a potentially significant and unavoidable impact that requires recirculation of the DEIR.

b. Mitigation Measures Are Insufficient to Reduce Well Impacts to Less than Significant Levels

Grp 20-20

CEQA requires mitigation measure to be fully enforceable through permit conditions, agreements or other legally-binding instruments (CEQA Guideline 15126.4). Mitigation Measure 4.8-2 requires Rise to provide 31 new water connections by constructing a water line along Bennet Road, but NID has not committed to granting such new connections. These connections will be subject to discretionary approvals that may not be granted. Accordingly, this mitigation measure cannot be deemed fully enforceable or achievable and the DEIR must identify potential impacts to groundwater wells as significant and unavoidable, which triggers a recirculation of the DEIR. Even if such a measure were enforceable by the County, which it is not, the mitigation measure does not mitigate the impact to less than significant levels. People could potentially lose access to water supplies forever, rendering their property essentially worthless. This potentially significant and unavoidable impact needs to be identified in the DEIR.

7. Permitting Overview is Flawed and Leads to Insufficient Mitigation

a. Water Board Permitting is Flawed and Leads to Deferred Mitigation With the Incorrect Performance Standard

Grp 20-21

The DEIR repeatedly and falsely claims that this Project, which will involve the pumping of 2,500 Gallons per minute for initial dewatering (815 Million gallons over 6-month period) and 850 gpm over the life of the 80-year project will fall under the State Water Board's General Permit for Limited Threat Discharge Permit (General Order R5-2016-0076; NPDES No. CAG995002) ("Limited Threat General Order"). The DEIR explicitly relies on the use of this General Order to ensure that hydrology impacts from discharges will be less than significant. (DEIR, pp.2-78, 3-15 to 3-18, 4.8-28) The extensive discharges this Project would cause for the next 80 years do not pose a 'low threat', but rather pose a significant threat to groundwater resources and the hydromorphology of Wolf Creek and the surrounding sensitive resources, and will not qualify under the Limited Threat General Order for many reasons, including but not limited to the fact that the proposed discharges:

i. Will exceed discharge limitations;

ii. Will not meet the required effluent limitations in the Limited Threat General Order based on the levels of ammonium, manganese, and likely other metals in the discharged effluent;
iii. Likely will violate the Basin Plan by impacting beneficial uses of receiving waters;
iv. May contain acid mine drainage;
v. May exceed TMDLs at the point of discharge;
vi. Will alter temperature > 5 degrees;
vii. May cause acute or chronic toxicity in receiving water; and
viii. May a nuisance under 13050 of the Water Code.

Grp 20-22

For all of these reasons, it would be highly inappropriate for the Water Board to allow this applicant to use the Limited Threat General Order to permit these extensive discharges, which will last 80+ years. Similarly, it also inappropriate for the DEIR to rely on the use of such a General Order to conclude that the Project will result in less than significant impacts under CEQA. (DEIR, pp.2-78, 3-15 to 3-18, 4.8-28; Mitigation Measure 4.8-1(a).). The DEIR should be revised to clarify that the Project will require an individual NPDES permit for proposed water discharges. Moreover, Mitigation Measure 4.8-1(a) should be revised to require an individual NPDES Permit under Section 402 of the Clean Water Act and an individual Waste Discharge Requirement ("WDR") under the California Porter-Cologne Act for such extensive discharges to ensure that discharges proposed for this Project will be mitigated to less than significant levels. The current mitigation measure relies on the use of an inapplicable permit to the Project, and accordingly, does not currently reduce the significant impacts from discharges to less than significant levels. The measure must be revised and the DEIR must be recirculated.

Grp 20-23

Based on this underestimate of permitting requirements, it is not clear whether the Water Board was consulted in the preparation of this DEIR as a responsible agency under CEQA as required under the CEQA Guidelines. Similar to the request regarding CDFW, we respectfully request that the County include in the response to comments document a description of its consultation with responsible and trustee agencies in the preparation of this DEIR.

Grp 20-24

8. Conclusion

For all of the reasons stated above, the DEIR is not adequate under CEQA and cannot be certified. It is imperative that the County revise and recirculate this DEIR to provide the public and decision makers with an accurate picture of all impacts that will be caused by this Project. To protect itself from legal liability and to protect this beautiful community, the DEIR must be revised and recirculated.

Thank you for your careful attention to this Project of critical concern to the residents of Nevada County.

Sincerely,

Jillian B. Blanchard
Managing Partner
Rudder Law Group, LLP

ATTACHMENT A
WATER BOARD COMMENT LETTER







Central Valley Regional Water Quality Control Board

24 September 2021

Dean Wright, Project Manager
Site Evaluation and Remediation Unit
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826

REVIEW OF DRAFT FINAL REMEDIAL ACTION PLAN CENTENNIAL M-1 PROPERTY, NEVADA COUNTY

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed the 25 January 2021 *Draft Final Remedial Action Plan* (RAP) for the Centennial M-1 Property (the Site) located at 10344 Centennial Drive in Grass Valley, Nevada County. The RAP was prepared pursuant to a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) between Rise Grass Valley Inc. (the Proponent) and the California Department of Toxic Substances Control (DTSC). NV5, an engineering services company, prepared the RAP on behalf of Rise Grass Valley Inc. Pursuant to the VCA, DTSC is the State lead agency for oversight of site characterization, remedy selection, and implementation of the cleanup activities. The Central Valley Water Board is a support agency for the project.

SITE INFORMATION AND DTSC RAP APPROACH:

The Site is historically associated with the Idaho Maryland Mine, a former underground hardrock (lode) gold mining operation. Historical mining and milling structures associated with the former mine were generally located to the east of the Site, and the Site was used primarily for disposal of mine waste (tailings and waste rock) to land. The historical tailings ponds comprise approximately two-thirds of the Site (37.1 acres of 56.4-acres).

Site investigation has identified mill tailings, waste rock, and impacted soil that contain lead, arsenic, mercury, and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated metals concentrations present a potential human health risk resulting from routine, long-term exposures including ingestion, inhalation of dust or vapors, and dermal contact. In addition, contaminated mine waste presents potential risks to ecological health and water quality.

The Site is zoned for industrial development (M1). A specific development plan has not been prepared. Prior to Site development for industrial/commercial use, the contaminated mine tailings are to be remediated under DTSC oversight. The RAP was prepared to outline the proposed remedial action based on the results of the risk assessment presented in the Preliminary Environmental Assessment (NV5, 2020). The purpose of the RAP is to evaluate



remedial alternatives and to select a remedial alternative that reduces, to the extent feasible, the risks associated with environmental conditions identified at the Site. The evaluation of remedial alternatives considers the effectiveness, implementability and cost associated with each alternative. The RAP also outlines procedures for excavation, on-site treatment, and consolidation of mining waste as engineered fill in an area that will be subject to land use controls at the Site.

A Remedial Design Implementation Plan (RDIP) will follow with more specific design documents and supporting details.

CENTRAL VALLEY WATER BOARD REQUIREMENTS

The following Water Board requirements apply to the work outlined in the RAP:

Water Code 13304, subdivision (a) provides in part that:

> *A person … who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution…, shall, upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution…, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.*

Water Code, section 13050, subdivision (q)(1) defines mining waste as follows:

> *"Mining waste" means all solid, semisolid, and liquid waste materials from the extraction, beneficiation, and processing of ores and minerals. Mining waste includes, but is not limited to, soil, waste rock, and overburden, as defined in Section 2732 of the Public Resources Code, and tailings, slag, and other processed waste materials, including cementitious materials that are managed at the cement manufacturing facility where the materials were generated.*

Title 27 California Code of Regulations (Title 27) Mining Waste Management Regulations (Cal. Code Regs., tit. 27, § 22470 et seq.) apply to all discharges of mining wastes and to owners/operators of a waste management unit for the treatment, storage, or disposal of mining waste.[1] The Mining Waste Management Regulations further define "mining waste" as:

> *waste from the mining and processing of ores and mineral commodities. Mining waste includes: (1) overburden; (2) natural geologic materials which have been removed or relocated but have not been processed (waste rock); and (3) the solid residues, sludges, and liquids from the processing of ores and mineral commodities.* (Cal. Code Regs., tit. 27, § 22480, sub.(a)).

Under Title 27, the Site constitutes an "inactive mining waste management unit," which is defined as:

> *any area containing mining wastes which is located at a present or former mining or milling site, and where all mining operations and discharges of mining waste ended*

[1] Authority cited: Water Code § 13172; Cal. Code Regs., tit. 27, § 20080(h).

and have not been resumed for 5 years, or more. (Cal. Code Regs., tit. 27, § 20164.)

Further, under Title 27 (see Cal. Code Regs., tit. 27, § 22470, subd. (a)), the Site's inactive mining waste management units are subject to reporting requirements and siting/construction standards determined to be feasible with regard to in situ containment of waste (see Section 20090, subd. (d)). Applicable and feasible requirements under Title 27 include (without limitation) those provisions pertaining to the containment, closure, and post-closure maintenance of inactive mining waste management units. (See Cal. Code Regs., tit. 27, §§22470-22510.)

The Central Valley Water Board reserves the right to designate additional Title 27 provisions to the inactive mining waste management units.

CENTRAL VALLEY WATER BOARD PERMITTING REQUIREMENTS

The following permitting requirements may apply to the project.

1. If a U.S. Army Corps of Engineers Clean Water Act Section 404 permit is required for the project, a corresponding Clean Water Act Section 401 Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

2. If the U.S. Army Corps of Engineers determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by the Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands are subject to State regulation.

   The State Board's "Procedures for Discharges of Dredged or Fill Material to Waters of the State" state that "Unless excluded by section IV.D, applicants must file an application with the Water Boards for any 111 activity that could result in the discharge of dredged or fill material to waters of the state in accordance with California Code of Regulations, title 23, section 3855." (p. 4)

   For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:.
   https://www.waterboards.ca.gov/centralvalley/help/permit/#wqcapp

3. Dischargers whose projects disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, and 2012-0006-DWQ, NPDES No. CAS000002. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground (such as stockpiling or excavation) but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit

requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/construction_general_permits/

4. Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

5. If the proposed project includes dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are covered under the *General Waste Discharge Requirements/NPDES Permit for Limited Threat Discharges to Surface Waters* Order R5-2016-0076-01/NPDES Permit No. CAG995002 (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding Limited Threat General Order and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/

6. If post remediation use of the Site includes placement of soil/waste rock (i.e. mining waste) from the proposed Idaho-Maryland Mine-Rise Grass Valley project, site activities will require Title 27 waste discharge requirements. See Specific Comment #1 for further discussion.

CENTRAL VALLEY WATER BOARD COMMENTS

General Comments:

1. Information provided in the RAP is comparable with information which would be submitted to a Regional Board in a Report of Waste Discharge (Water Code §13260) for Title 27 waste discharge requirements for discharges of mining waste and contains similar information required by the Title 27 Mining Waste Management Regulations. As required by Title 27, sections 22480 through 22510, the RAP has:
    a. characterized and classified the mining waste,
    b. identified the potential risk of water quality degradation for both surface water and groundwater,
    c. identified treatment and containment strategies, and
    d. specified mining unit siting and construction standards, monitoring requirements, and closure and post closure maintenance requirements, including financial assurances.

2. The term "engineered fill" discussed throughout the RAP is considered a "mining unit" as defined in Title 27, section 22470 because the engineered fill material is derived from material classified under Title 27 as mining waste. As such, Title 27 regulations pertaining to mining units are applicable.

3. The terms "chemical stabilization", "cement stabilization", and "stabilization" are viewed as referring to "treatment" as identified in Title 27, section 22480, subdivision (d).

4. To the extent feasible, the cumulative impacts to water quality incurred by the project described in the RAP and potential future discharge of mine waste generated by the proposed Idaho-Maryland Mine-Rise Grass Valley project should be considered in a single environmental document. This seems particularly relevant considering the potential use of the Centennial Property for management and reuse of mine waste generated by the proposed Idaho-Maryland Mine-Rise Grass Valley project. Given the information currently available to us, staff are unable to assess the cumulative impacts to water quality or whether the existing environmental document prepared for the RAP is adequate to support future WDRs for Waters of the State (see Permitting Requirement 2).

Specific Comments:

1. **Section 1.4.1 DTSC Comments on Draft RAP**
   4. *DTSC has been made aware that post remediation use of the property may include additional soil/waste rock being brought on the Site from the nearby mine if/when it reopens. If such a post remedial use of the property is envisioned, DTSC believes its potential impacts on the remedy or maintenance of the remedy should be briefly discussed in the RAP in the interest of full disclosure to the public.*

   Comment: If post remediation use of the Site includes placement of soil/waste rock (i.e. mining waste) from the proposed Idaho-Maryland Mine-Rise Grass Valley project, the Central Valley Water Board would exercise its Water Code section 13172 authority and Title 27, section 20080, subdivision (h) to regulate the discharges of mining waste. Additionally, the discharge of mining waste at the remediated Site will require submittal of a Report of Waste Discharge and issuance of Waste Discharge Requirements from the Central Valley Water Board (Water Code §13260).

2. **Section 2.6.3 Intended Use of the Property**
   The remedy described in this RAP includes the consolidation of mine waste as engineered fill, and placement of clean engineered fill as a cap over the consolidated mine waste.

   Comment: The use of clean engineered fill as a cap over the consolidated mining waste may be appropriate for Group C mining waste (see Cal. Code Regs., tit. 27, §22490, subd. (c) and Table 1.3). However, the following details are needed, either in the final RAP or RDIP:
   a. run-on/run-off controls (Cal. Code Regs., tit. 27, §22490, subd. (h)(3) and §20365, subd. (e)),
   b. the source or origin, soil properties, and stability of the clean engineered fill,
   c. whether the cap will be vegetated or stabilized to prevent erosion as required by California Code of Regulations, title 27, section 22510, subdivision (m), and
   d. specific plans to keep the mining unit "high and dry".

3. **Section 3.4.4 Summary of Water Quality Evaluation**
   Laboratory results indicate that the potential for acid generation is low and the potential for discharge or leaching of heavy metals at concentrations that would significantly impact surface water or groundwater quality is low. Based on these results the mine waste excluding the TP19 hot spot, when considered as a whole, can be managed as Group C mine waste as defined in CCR Title 27 Section 2248(b).

Comment: Central Valley Water Board staff concurs with the characterization and classification methodology for the mining waste and the proposed treatment of the TP19 Hot Spot material (see General Comment 2 above). We also concur with the RAP's assessment, that when considered as a whole, the waste can be managed as Group C mining waste in accordance with Title 27 Mining Waste Management Regulations.

4. **Section 7.7.5 Characterization for On-Site Placement**
Characterization of affected mine waste and soil was performed as part of the site investigation. Mine waste and affected soil that is (sic) *to be placed on-site will not require further characterization.*

Comment: The RAP does not propose any confirmation sampling to demonstrate removal of mining waste. Typically, these types of projects include confirmation sampling (e.g., field characterization such as X-ray fluorescence with a subset of laboratory samples) to demonstrate achievement of cleanup goals. Why is this not needed for this project and what method(s) will be used as the basis for evaluating that contaminated soil (mining waste) has been removed?

5. **Section 7.8.1 Deed Restriction**

Comment: Is it reasonably anticipated that soil/waste rock (i.e. mining waste) from the proposed Idaho-Maryland Mine-Rise Grass Valley project could in the future encroach upon or cover the deed restricted engineered fill? If so, is this a cause for concern?

CLOSING

The draft Final RAP should be revised to address Central Valley Water Board staff's comments. Staff understands that a RDIP will follow with more specific design documents and supporting details. We request the opportunity to review and offer further comments on the Final RAP and RDIP.

Please contact Jeff Huggins at (916) 464-4639 or Jeff.Huggins@waterboards.ca.gov with any questions regarding the contents of this letter. We are available to meet with you if you would like to discuss the applicable Water Board requirements or potentially applicable permits.

Jeff S. Huggins





JEFF H. HUGGINS
Water Resource Control Engineer

JOE MELLO, PG 6091, CHG 545
Senior Engineering Geologist
Central Valley Water Board

cc: (via email only)

Matt Kelley, Senior Planner Nevada County Planning Department, Nevada City
Ben Mossman, Chief Executive Officer, Rise Grass Valley
Jason Muir, NV5, Nevada City

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Senior Engineering Geologist
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cc: (via email only)

Matt Kelley, Senior Planner Nevada County Planning Department, Nevada City
Ben Mossman, Chief Executive Officer, Rise Grass Valley
Jason Muir, NV5, Nevada City

GROUP LETTER 20: JILLIAN BLANCHARD, RUDDER LAW GROUP, LLP

Response to Comment Grp 20-1

The commenter generally asserts that the DEIR is inadequate and should be revised and recirculated. The commenter states that reason for recirculation is the DEIR's failure to describe the project, identify significant impacts, identify feasible mitigation measures to minimize impacts and failure to identify alternatives that would avoid impacts. This comment is general in nature and does not specifically identify any defect in the DEIR. Accordingly, no further response is required. Responses to the commenter's specific concerns are provided below.

Response to Comment Grp 20-2

The commenter asserts that the DEIR is deficient because it does not include the Centennial site cleanup project. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-3

The commenter asserts that the Notice of Preparation (NOP) states that the Centennial Cleanup Project was "part of the proposed project" and that now the project description has been changed to remove the cleanup work from the scope of the project, requiring a new NOP to be released. However, the commenter mischaracterizes the text of the NOP, which clearly states that, "The Project Applicant is working with the California Department of Toxic Substances Control (DTSC) to develop a plan to consolidate and cap the contaminated soils in a manner consistent with current federal and State regulations, separate from the proposed project." (NOP, p. 5.) The language cited by the commenter is provided out of context, as the referenced sentence states that the engineered fill will be placed on the Centennial site as part of the project *after* the DTSC cleanup is completed as follows: "The environmental cleanup work at the Centennial Industrial Site will be completed under the DTSC voluntary cleanup program. After such environmental cleanup work is completed, as part of the proposed project, engineered fill from the Brunswick Industrial Site would be placed, graded, and compacted on the Centennial Industrial Site." (NOP, p. 7.) As such, the Project Description in the DEIR is consistent with the NOP. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-4

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-5

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-6

As discussed in Section 1.3 of the DEIR, the baseline for the Centennial Site was adjusted because the proposed project could not possibly impact that site until and unless the DTSC cleanup project has already been completed. As such, presenting the project's impacts to the Centennial Site based on the pre-DTSC Project conditions would be misleading to the public and decision-makers and would not represent the actual project impacts. This adjusted baseline is appropriate under CEQA Guidelines Section 15125(a)(1), and is supported by substantial evidence in the record. Please see Section 1.3 of the DEIR and Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

The commenter incorrectly asserts that the Centennial Site is a "Superfund" site. The Centennial Site has never been on the National Priorities List[8] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[9].

Response to Comment Grp 20-7

The commenter asserts that the DEIR must be revised to include the DTSC project in the Project Description. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-8

The commenter asserts that the project should assume that the DTSC project will not impact the wetlands on the Centennial Site and that all wetlands should be assumed to be impacted by the project, as the impact is speculative. As such, the commenter asserts that the DEIR must conclude that the impact to wetlands is significant and unavoidable, and at the very least, wetlands mitigation at a 1 to 1 ratio should be provided. The remaining wetlands that could be onsite after the DTSC cleanup project is complete are calculated in the EIR based on the expected impact under DTSC's existing remedial action plan, not on mere speculation. As shown in Figure 4.4-9 of the DEIR, most of the existing wetlands that will be removed in the cleanup project are directly on top of the historic mine tailings and therefore must be removed in order to excavate the historic tailings as part of the cleanup project. Rather, the commenter's assertion that public comments on DTSC's IS/MND, asking DTSC to revise the RAP to avoid more wetlands, could significantly alter the footprint of the disturbed area on the Centennial Site, is speculative. The DEIR's reliance on the RAP and the IS/MND for the DTSC cleanup project is substantial evidence, while reliance on the commenter's arguments would be speculation. Further, Mitigation Measure 4.4-3(c) already requires coordination with the Corps and mitigation of wetlands in accordance with the Corps' no-net-loss policy, which therefore already requires at least a 1 to 1 mitigation ratio. As such, the impact analysis is based on substantial evidence and the mitigation would fully address additional wetlands impacts, even in the case where there were more wetlands existing onsite after the DTSC cleanup project than anticipated in the DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-9

The commenter suggests that the portions of the Centennial Site that are revegetated after Centennial cleanup will contain biological resources. The commenter does not provide evidence that biological resources protected pursuant to federal, state, or local laws will be supported by revegetation efforts with erosion control seed mixes. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-10

The commenter asserts that the Centennial site is a superfund site; however, this is not correct. The Centennial site is the subject of a separate DTSC cleanup project, not a superfund cleanup. After the DTSC cleanup project is complete, the Centennial Site would be subject to restrictions imposed by DTSC such as restrictions on penetration of the protective cap placed on any capped contaminated soils, with which the project would need to comply to avoid release of those capped contaminated soils. As stated in Section 7.11 of the Remedial Action Plan, an Operation and Maintenance Plan is required to establish procedures for long-term operation, inspection, maintenance, monitoring, and regulatory reporting that are required to preserve the engineering

[8] https://www.epa.gov/superfund/superfund-national-priorities-list-npl
[9] https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi

controls associated with the mine waste consolidation area. As such, the placement of engineered fill on the Centennial Site would not result in disturbance of the capped soils and would not result in hazard impacts related to release of that soil. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-11

The separate DTSC cleanup project on the Centennial site is a temporary construction project that would not result in permanent development of land, construction of structures, or permanent contribution to traffic, noise, or air quality that would combine with the proposed project's related effects. The commenter also mentions cumulative biological resource impacts. The DEIR, Impact 4.4-6, already identifies that the project, in combination with other cumulative development, could have a significant cumulative impact, and there is no evidence to suggest that the incremental effect of the loss of wetlands on the Centennial Site, attributable to remediation, would render this impact significant and unavoidable. The DTSC project would be required to mitigate its impacts through compliance with regulatory permit requirements for those resources. All projects within the County are required to mitigate for their impacts to biological resources, and in the case of wetlands, compliance with the USACE's no-net-loss policy. Accordingly, addition of the Centennial Site DTSC cleanup project would not result in a different cumulative impact conclusion for any resource area.

As stated in the DEIR (page 4.4-97), the proposed project's incremental contribution to the significant cumulative biological effect could be reduced with implementation of the mitigation measures required in this EIR.

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-12

The commenter asserts that the DEIR is inadequate because there may be more Pine Hill Flannelbush onsite after the DTSC Project is complete than expected by the DEIR. However, Mitigation Measure 4.4-1(a) of the DEIR would apply to the Flannelbush found onsite, even if there were more than originally anticipated, involving implementation of a Habitat Management Plan for Flannelbush, seed collection, transplantation and monitoring to ensure success of transplants. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 20-13

Please see Master Response 4 - Clean-Up Project is a Separate Project under CEQA, regarding the Centennial Industrial Site baseline conditions for DEIR impact analysis.

As explained in Impact 4.4-2, Visual Encounter Surveys were conducted for Foothill Yellow Legged Frog and none were identified onsite. The DEIR conservatively considered this a potentially significant impact and required mitigation. Mitigation Measure 4.4-2(a) requires preconstruction surveys "no more than fourteen (14) days prior to disturbance." If the species is identified, the mitigation measure then requires that the mine operator immediately contact CDFW and then requires the appropriate state and federal permitting prior to the start of construction. Contrary to the commenter's assertion, state and federal permits should not be required unless there is a potential impact to the species, which based on surveys to date, will not occur. Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

In addition, contrary to the commenter's assertion, both federal and state resource agencies (including CDFW) have been consulted throughout the environmental review including reviewing notices for both the Notice of Preparation and Notice of Availability.

The commenter also states that Foothill Yellow Legged Frog is proposed to be listed as endangered under the Federal Endangered Species Act. The project area is located within the Northern Sierra Unit, which is not proposed for listing.

Response to Comment Grp 20-14

Please see Response to Comment 13 above and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 20-15

As identified in DEIR Chapter 4.4, California Black Rail was considered to have a "very low" likelihood of being found onsite in the DEIR. Note that the DEIR reflected that California Black Rail is California Threatened, but it is also considered California Fully Protected. The DEIR has been amended to reflect the Fully Protected status for this species. Additionally, Mitigation Measure 4.4-2(d) requiring preconstruction surveys for California Black Rail, has been amended to remove reference to an ITP being obtained for take of California Black Rail if identified onsite during these preconstruction surveys. This species is considered to have a very low potential to be found onsite; nonetheless, surveys will be conducted prior to site disturbance, and consultation with CDFW and avoidance shall be required in the case of species presence, prior to commencement of on-site disturbance. For these reasons, the DEIR considered this impact less than significant after mitigation.

Noise impacts to wildlife and bird species were analyzed in Impact 4.4-2 and determined to be less than significant.

Response to Comment Grp 20-16

The commenter asserts that biological impacts should be considered significant and potentially unavoidable due to the uncertainty of impacts, the potential for take of protected species and the potential for impacts to fully protected species. However, the mitigation measures required for the project require pre-construction surveys for special-status species, consultation with state and federal resource agencies if species are present, and require take permits of special-status species if take is possible. The project would not be allowed to obtain a take permit for any Fully-protected species found onsite, so avoidance of those species would be required. For these reasons, the County reasonably concluded that the required mitigation would reduce the biological impacts to less than significant after mitigation.

Response to Comment Grp 20-17

Please see Responses to Comments Grp 21-122 to Grp 21-127 for responses to Baseline Environmental Consulting Group's air-related comments.

Regarding air emissions from the separate Centennial clean-up project, please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Regarding construction timeline, please see Master Response 24 - Project Construction Schedule.

Regarding proposed use of Tier 4 engines during operations and criteria pollutant emissions, please see Master Response 19 - NSAQMD Criteria Pollution Thresholds during Operations.

Response to Comment Grp 20-18

Please see Chapter 4.8 of the DEIR, Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

For responses to Baseline Environmental Group's hydrology-related comments, see Responses to Comments Grp 21-110 to Grp 21-121.

Response to Comment Grp 20-19

Please see responses to NID comments in Agcy Letter 10 of the Final EIR.

Response to Comment Grp 20-20

The Water Supply Assessment relating to water supply for the project, including the connection of parcels along East Bennett Road, was approved by the Nevada Irrigation District in February of 2022. Accordingly, NID has already determined that sufficient water supply exists for these connections and has committed to providing water for the project and those connections.

Response to Comment Grp 20-21

The commenter asserts that the project's discharge of treated water from the underground mine works would not qualify for coverage under the Limited Threat General Order. However, the commenter provides no evidence that the water could not be treated to meet the standards required for the Limited Threat General Order. In fact, the nearby Empire Mine and Northstar Mine both discharge treated mine water under the Limited Threat General Order, providing evidence that treatment methods are available to meet the Limited Threat General Order standards. Additionally, the DEIR requires installation of a water treatment plant specifically designed to meet the applicable standards. (See Mitigation Measure 4.8-1(a).) The County's independent expert reviewed the water treatment plant designs and confirmed that the treatment plant could meet the applicable standards. As stated on page 4.8-41 of the DEIR, "West Yost's technical peer review of Linkan's Water Treatment Plant Design Report confirmed that the proposed method of treatment would be adequate to successfully treat the mine water to comply with RWQCB effluent limitations, and identified items for Linkan Engineering to consider during the detailed design phase."

Regarding water temperatures, please see Master Response 32 – Temperature of Mine Water Discharge.

Response to Comment Grp 20-22

Please see Response to Comment Grp 20-21 above.

Response to Comment Grp 20-23

The regional water quality control board (RWQCB) was provided notice of the project's DEIR, and provided comments on the DEIR. Notably, the RWQCB did not state that the Limited Threat General Order was inapplicable, and rather confirmed that the RWQCB would review the notice of applicability when that is submitted, as is done for any project proposing to discharge under the Limited Threat General Order.

Response to Comment Grp 20-24

The commenter asserts that the DEIR should be revised and recirculated. The County has determined that recirculation of the DEIR is not required, as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

Group Letter 21

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Via E-Mail

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Re: Idaho-Maryland Mine Project Draft Environmental Impact Report

Dear Mr. Kelley:

Grp 21-1

On behalf of Community Environmental Advocates Foundation (CEA), we respectfully submit these comments in connection with the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project (Project). CEA seeks to ensure any development and operations at the Project site protects the site's unique environmental resources and addresses the community's needs and concerns. To that end, the DEIR plays a critical role in informing the public and decisionmakers about the environmental impacts of the Project and how best to avoid these impacts through mitigation and alternatives to the Project. After carefully reviewing the DEIR, we have concluded that it fails to comply with the requirements of the California Environmental Quality Act (CEQA), Public Resources Code section 2100 et seq.

The EIR is "the heart of CEQA." *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 392 ("*Laurel Heights I*"; citations omitted). It is "intended to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action. Because the EIR must be certified or rejected by public officials, it is a document of accountability." *Id.* (internal quotations and citations omitted).

Grp 21-2

This DEIR's flaws prevent it from achieving its required informational purpose. An overarching defect is the DEIR's failure to accurately describe the Project. The DEIR's project description is legally inadequate because, among other things, it improperly excludes the required cleanup of existing contamination on part of the Project site (the Centennial Site) from the scope of the Project. In addition, the DEIR improperly uses post-cleanup conditions on the Centennial Site as the baseline for impact analysis instead of the existing conditions on the site.

Grp 21-3

The DEIR further violates CEQA because it fails to properly analyze or mitigate the Project's numerous significant environmental impacts. The Applicant is requesting a conditional

use permit (CUP) to operate the mine for 80 years. Yet, according to geophysicist and mineral exploration expert David M. Chambers, Ph.D., the design details of the Project, including its "engineered fill" have yet to be determined, so it is not possible to determine if the proposed design of the Project is geotechnically sound.[1] *See* Report from David Chambers, Ph.D., submitted under separate cover. Nor does the DEIR provide the necessary information on the geochemistry of the waste rock and tailings to evaluate the environmental impacts of the proposed mine's operations. *Id.*

Grp 21-4

In addition, the DEIR fails to adequately evaluate how the Project would affect hydrology and groundwater levels in the Project vicinity. The need for an accurate analysis cannot be overstated since even a slight drawdown in groundwater levels could severely affect those in the community that rely exclusively on well water. Among its many shortcomings, the DEIR fails to accurately describe the existing hydrologic conditions in the area, lacks thresholds of significance for evaluating the Project's impacts on groundwater supplies, relies on a flawed groundwater model, lacks *any* modeling of the Project's water quality impacts, and fails to identify effective mitigation capable of mitigating the few groundwater impacts the DEIR does disclose.

Grp 21-5

The DEIR fares no better in its analysis of noise and vibration impacts from on-going mining operations because it substantially underestimates the severity and extent of these impacts. The document largely relies on compliance with County standards to conclude that the Project's noise impacts would be less than significant, downplaying entirely that noise from the Project's operations could increase substantially in this quiet rural residential community. It fails to disclose the geographic extent of where noise and vibration impacts could occur and omits any analysis of noise impacts resulting from remediation of the Centennial Site. It also fails to provide an adequate analysis of noise and vibration impacts from the Project's ongoing blasting operations and disregards entirely the potential for these operations to cause sleep disturbance.

Grp 21-6

The DEIR's analysis of hazards and hazardous materials is equally deficient. Although there is no evidence that clean-up of the Centennial Site will occur prior to implementation of the Project, the DEIR simply assumes that such clean-up will occur. The document also fails to analyze or mitigate hazardous impacts relating to waste rock and mine tailings, opting instead to take a "trust us" approach when it promises to comply with environmental regulations. And

[1] The DEIR repeatedly refers to "engineered fill" but it never defines this term. The document appears to be trying to "rebrand" the prior mine's waste rock and mine tailings as "engineered fill," apparently in the hopes that the waste material can be transported off-site for use at various unspecified construction sites throughout the region as fill material, which would almost certainly result in numerous new contaminated waste sites that pose a threat to the public and the environment. Exhibit A (Baseline Environmental Report) at 3, 4.

despite the fact that the Project could cause a super-saturated plume cloud that could affect operations at the Nevada County Air Park, the DEIR fails to provide any analysis of this impact.

Grp 21-7 The DEIR's analysis of air quality, greenhouse gas (GHG) emissions, and energy use also contains numerous flaws. First, the DEIR fails to analyze the effect that the cleanup of the Centennial Site would have on air quality, GHG emissions, or energy use, or the air quality impacts, GHG impacts, or energy impacts that may result from the proposed Project if the Centennial cleanup does not occur. Second, the DEIR's analysis of air quality impacts, GHGs, and energy use from Project construction assumes a construction timeline that contradicts the DEIR's description of the Project. Third, the DEIR improperly relies on assumed mitigation measures for air quality impacts, GHGs, and energy use, failing to acknowledge those measures as mitigation. Fourth, the DEIR fails to mitigate significant air quality impacts from operational emissions of criteria air pollutants. Fifth, the DEIR's Health Risk Assessment fails to disclose essential information and lacks substantial evidence to support its conclusions. Sixth, the DEIR's significance threshold for operational GHG emissions is unsupported. Finally, the DEIR relies on third-party GHG mitigation offsets which lack adequate performance standards and are improperly deferred.

Grp 21-8 The DEIR also fails to meet CEQA's clear mandates because it does not provide a reasonable range of alternatives. The DEIR identifies the Project's significant and unavoidable impacts as those on aesthetics, noise, and transportation. Yet, except for the "no project" alternative, which would not meet any of the Project objectives, none of the examined alternatives would reduce the Project's impacts on aesthetics, noise, and transportation to a less than significant level. Moreover, given the Project's significant impacts in a range of areas, including GHG emissions, air quality, water supply and water quality, the DEIR must be revised to include alternatives that would reduce these impacts.

Grp 21-9 Where, as here, the environmental review document fails to fully and accurately inform decisionmakers and the public of the environmental consequences of proposed actions, it does not satisfy the basic goals of CEQA. See Pub. Res. Code § 21061. As a result of the DEIR's numerous and serious inadequacies, there can be no meaningful public review of the Project. The magnitude of the revisions required to create a legally adequate EIR will require recirculation of a revised DEIR, not just publication of a Final EIR, to give decision-makers and the public an accurate understanding of the environmental issues at stake. *See* CEQA Guidelines[2] § 15088.5(a)(4).

Grp 21-10 This letter, along with the February 15, 2022 report prepared by Baseline Environmental Consulting addressing air quality, GHG emissions, energy, hydrology, water quality, and hazards (attached as Exhibit A), and the March 9, 2022 prepared by Salter addressing noise and vibration (attached as Exhibit B) constitute our comments on the DEIR. Please refer to these reports for

[2] The "CEQA Guidelines" are found at Cal. Code Regs., tit. 14, § 15000 et seq.

further detail and discussion of the DEIR's inadequacies. We request that the County respond to both the comments in this letter and to each of the comments in the attached reports.

In addition, CEA will be submitting its own letter on the DEIR. We have reviewed this letter and concur with its findings. The CEA letter is hereby incorporated by reference into this letter.

I. The DEIR's Flawed Project Description and Inaccurate Baseline Do Not Permit Meaningful Public Review of the Project.

Grp 21-11

The DEIR's project description is flawed for several reasons. First, it improperly excludes the cleanup of the Centennial Site from the scope of the Project. Second, the DEIR lacks a legally adequate baseline because it improperly uses post-cleanup conditions on the Centennial Site as the baseline for impact analysis instead of the existing conditions on the site. Third, the Project description is incomplete and unstable because it fails to adequately describe the duration of required permits and does not consistently describe the duration of Project construction or the phasing of mining and exploration activities over the entire permit period.

A. Project Background

Grp 21-12

The proposed Project would reopen the abandoned Idaho-Maryland Mine in unincorporated western Nevada County near the City of Grass Valley. DEIR at 3-1, 3-12. The Project would involve underground gold mining within a 2,585-acre mineral rights boundary owned by the Applicant, Rise Grass Valley. *Id.* at 3-1. The Project's surface components would be spread across 175.64 acres, consisting of two sites, the 119-acre Brunswick Industrial Site and the 56.41-acre Centennial Industrial Site, as well as a potable water pipeline easement connecting the sites. *Id.* at 3-1, 3-12.

The Centennial Site is located immediately adjacent to the city limits of the City of Grass Valley, and is surrounded by light industrial and commercial uses. *Id.* at 3-11. The Brunswick Site is surrounded by rural residential neighborhoods of single-family homes and undeveloped open space. *Id.* Both sites are zoned for light industrial use. *Id.* at 3-1. The South Fork of Wolf Creek runs through the Brunswick Site, and the main stem of Wolf Creek runs through the Centennial site. *Id.* at 3-13, 3-16. Wetlands and riparian habitat are located along the main stem and South Fork of Wolf Creek. *Id.* at 3-10, 3-33, 4.4-2.

Both the Brunswick and Centennial sites were part of previous mining operations prior to the closure of the Idaho-Maryland Mine in 1956. *Id.* at 3-9. The Brunswick Site contains mine shafts which provided access to the mine, while the Centennial Site was historically used for dumping mine waste. *Id.* at 3-9 to 3-10. The Centennial Site contains mine waste contaminated with arsenic, lead, thallium, mercury, and nickel. *Id.* at 4.7-3. Because of this existing pollution and unstable soil conditions, the Centennial Site cannot be redeveloped until the contamination is

remediated. *Id.* at 3-10, 3-33. The Applicant has entered into a Voluntary Cleanup Agreement with the California Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Site. *Id.* at 3-10. DTSC is reviewing a proposed Remedial Action Plan (RAP) under which the Applicant would excavate contaminated soils, and consolidate and stabilize contaminated materials within a 5.6-acre area where they would be mixed with cement and capped with four feet of soil. *Id.*; *see* RAP, attached as Exhibit C.

The Project would require pumping approximately 2,500 acre-feet of groundwater ("dewatering") out of the abandoned underground mine over a six-month period before mining operations could begin. *Id.* at 3-11 to 3-12, 3-15. Gold mining and mineralization would then occur over an 80-year permit period, with a planned production of 1,000 tons of gold mineralization per day (365,000 tons per year). *Id.* at 3-19. Mining would occur 24 hours per day, 7 days per week. *Id.* at 3-18. Mining would require the daily underground detonation of ammonia nitrate fuel oil and packaged or bulk emulsion explosives. *Id.* at 3-19. The mine would generate approximately 500 tons of waste rock per day, which would be transported to the surface. *Id.* In addition, approximately 850 gallons of groundwater per minute would be pumped out of the mine on a continuous basis during operations. *Id.* at 3-18. Pumped groundwater would be discharged into the South Fork of Wolf Creek after treatment. *Id.* at 3-29.

The Project proposes to construct new aboveground processing facilities for gold and mine waste as well as water treatment facilities and a wastewater pond at the Brunswick Site. *Id.* at 3-11 to 3-12. Waste rock or tailings excavated from the mine would be dumped on the Centennial and Brunswick sites, where they would be graded into "engineered fill" pads intended to support future industrial development on both sites. *Id.* The fill pad at the Centennial Site would cover an area of 44 acres and contain 1.6 million tons of mine waste, while the fill pad at the Brunswick Site would cover 31 acres and contain 2.2 million tons of mine waste. *Id.* at 3-32 to 3-33. However, remediation of the Centennial Site under a DTSC-approved RAP would need to be completed before that site could be used for dumping waste from the mine. *Id.* at 3-10.

Once dumping begins, the DEIR estimates that the Centennial Site would be completely filled with mine waste in five years, and the Brunswick Site would be filled in six years. *Id.* at 3-26, 3-28. After the dumping areas at the Centennial and Brunswick sites have reached their maximum capacity, mine waste from the Project would be trucked offsite and disposed of elsewhere for the remainder of the 80-year proposed lease term. *Id.* Mine waste would be trucked offsite along Brunswick Road to SR 20/49. *Id.* at 3-29. Following completion of mining and processing activities, the Project proposes to restore the Centennial and Brunswick sites for future industrial use as outlined in a Reclamation Plan. *Id.* at 3-12.

Grp 21-13

B. The DEIR Does Not Use the Correct Baseline of Existing Conditions at the Centennial Site.

CEQA requires that an EIR include an accurate description of a project's environmental setting, which provides "the baseline physical conditions by which a lead agency determines whether an impact is significant." CEQA Guidelines § 15125(a). This baseline "should describe physical environmental conditions as they exist at the time the notice of preparation is published." *Id.* The purpose of this requirement is "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." *Id.* "Without a determination and description of the existing physical conditions on the property at the start of the environmental review process, the EIR cannot provide a meaningful assessment of the environmental impacts of the proposed project." *Save Our Peninsula Com. v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 119.

Here, the DEIR lacks a legally adequate baseline because it improperly uses hypothetical future post-cleanup conditions on the Centennial Site as the baseline for impact analysis instead of the existing conditions on the site. *See* Exhibit A (Baseline Report) at 2. As the DEIR acknowledges, the Centennial Site is currently contaminated with toxic mine waste, and cannot be used for the Project until the contamination has been remediated in a DTSC-approved cleanup. DEIR at 3-10, 3-33. The correct baseline for the site therefore must reflect the current contaminated state of the property. However, the DEIR does not use these existing conditions at the Centennial Site as the baseline for impact analysis. Instead, the DEIR simply assumes that cleanup of the site will be completed, and uses expected future post-remediation conditions at the site as the baseline. *Id.* at 1-4, 1-6, 3-10. The DEIR uses this assumed post-remediation baseline for the Centennial Site in its analysis of aesthetic impacts, agriculture and forestry resources, biological resources, hazards and hazardous materials, and wildfire risk. *Id.* at 1-6 to 1-7.

Elsewhere, however, the DEIR acknowledges the possibility that the cleanup of the Centennial Site might never be approved by DTSC and might never be completed during the 80-year term of the Project permit. *Id.* at 1-3, 3-26. The DEIR asserts that in that case, the mine waste that would otherwise be dumped on the Centennial Site would be trucked offsite and disposed of elsewhere in "local and regional construction markets" after the fill area at the Brunswick Site is full. *Id.* at 1-3, 3-26.

DTSC has not yet approved the Centennial Site cleanup, which is currently undergoing a separate CEQA review. *See id.* at 1-5. Because DTSC might not approve the cleanup, and Rise Gold might not complete it, the DEIR's use of a hypothetical post-remediation baseline in its analysis of Project impacts on the Centennial Site is inappropriate. The DEIR's baseline for the site ignores this uncertainty, simply assuming the future cleanup will occur. The CEQA Guidelines clearly state that "[a]n existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline." CEQA Guidelines § 15125(a)(3). An EIR's failure to accurately determine existing baseline conditions "renders the identification of environmental impacts legally inadequate and precludes a determination that substantial evidence supports" the

EIR's conclusions about the significance of project impacts or the effectiveness of mitigation. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 729. Without "an adequate baseline description . . . analysis of impacts [and] mitigation measures . . . becomes impossible." *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 953. Because the DEIR's analysis of aesthetic impacts, agriculture and forestry, biological resources, hazardous materials, and wildfire risk is based on this flawed and uncertain baseline, that analysis is legally inadequate and cannot be supported by substantial evidence.

Anticipating criticism of this glaring flaw, the DEIR preemptively seeks to defend its use of the post-remediation baseline for the Centennial Site. DEIR at 1-3 to 1-7. The DEIR cites the CEQA Guidelines, which provide that "where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or *conditions expected when the project becomes operational*, or both, that are supported with substantial evidence" CEQA Guidelines Section 15125(a)(1) (emphasis added); DEIR at 1-3 to 1-4. The DEIR also cites *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority*, where the court noted that "in appropriate circumstances an existing conditions analysis may take account of *environmental conditions that will exist when the project begins operations*; the agency is not strictly limited to those prevailing during the period of EIR preparation. An agency may, where appropriate, adjust its existing conditions baseline to account for a major change in environmental conditions that is expected to occur *before project implementation*." *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 452 (emphasis added); DEIR at 1-4.

The DEIR's attempted defense is unavailing. As the italicized language makes clear, the quoted portions of CEQA Guidelines Section 15125(a)(1) and *Neighbors for Smart Rail* allow an EIR to use a baseline that consists of conditions that "will exist when the project begins operations." But here there is no guarantee that the Centennial Site cleanup will have even started—let alone been completed—before the Project begins operations. As discussed above, the DEIR expressly acknowledges that the Centennial Site cleanup may not be approved by DTSC and may *never* be completed within the entire 80-year term of the mine permit. DEIR at 1-3, 3-26. The DEIR asserts that "the Idaho-Maryland Mine Project can proceed independently from the Centennial Clean-Up Project, *even if the Centennial Clean-Up Project is not completed within the term of the mining permit*, in which case, material from the Idaho-Maryland Mine Project would not be placed on the Centennial Industrial Site." DEIR at 1-7 (emphasis added). This statement is flatly inconsistent with its assumption for baseline purposes that the Centennial cleanup would be completed before the mine begins operations.

The DEIR incorrectly asserts that it is *not* using a "future baseline" for the Centennial Site, noting that "[a] future baseline is understood to be a point in time beyond the date of project operations." DEIR at 1-4. This assertion misrepresents the relevant legal standard. A future

baseline is one that does not currently exists, but is assumed to exist in the future when the Project becomes operational. But again, the DEIR acknowledges that its chosen post-remediation baseline for the Centennial Site may not occur until after Project operations have begun. *Id.* at 1-3, 3-26 (noting possibility that "the remediation of the Centennial Industrial Site, currently under DTSC oversight, is not complete upon commencement of mining"). Therefore, in order to use post-remediation conditions as the sole baseline, the DEIR would need to satisfy CEQA's requirements for "future baselines." The Guidelines provide that "[a] lead agency may use projected future conditions (beyond the date of project operations) baseline as the sole baseline for analysis only if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record." CEQA Guidelines § 15125(a)(2). The DEIR fails to meet that standard here: it does not demonstrate with substantial evidence that the Centennial cleanup can be reliably projected to occur, nor does it show that using existing conditions as the Centennial baseline would be either misleading or without informative value to decision-makers or the public. The DEIR's attempted use of a future baseline therefore violates CEQA.

The DEIR must be revised to consistently use existing conditions as the baseline for the Centennial Site, and cannot merely assume that the proposed Centennial cleanup will be approved or completed. The document's analysis of aesthetic impacts, agriculture and forestry resources, biological resources, hazards and hazardous materials, and wildfire risk (which all use the assumed post-remediation baseline) must be revised to evaluate those impacts with reference to existing contaminated conditions on the Centennial Site, and must consider the possibility that the cleanup may not occur before mine operations begin, or at all.

Grp 21-14

Moreover, the DEIR must analyze other additional environmental impacts that might result from the Project if the Centennial cleanup does *not* occur. If the Centennial Site is never remediated during the term of the mine permit, the site will never become available for dumping of mine waste, and an additional 1.6 million tons of mine waste from the Project will need to be trucked offsite once the dumping area at the Brunswick Site is full. DEIR at 1-3, 3-32 to 3-33, 3-26. The DEIR must evaluate the potential impacts of the offsite trucking of those additional 1.6 million tons of mine waste on air quality, GHG emissions, energy use, and noise. It currently fails to do so. *See* DEIR at 4.3-50, 4.3-53 to 4.3-54, 4.3-67 to 4.3-68 (air quality and GHG analysis assumes dumping of fill at Centennial site); *id.* at 4.10-33, 4.10-35 (noise analysis). Furthermore, the DEIR must explain how the Applicant will meet its commitment to reclaim the Centennial Site for future industrial use (DEIR at 3-12, 3-42, 3-46) if the Centennial cleanup is not completed. The DEIR must be revised to correct these flaws and then recirculated.

Grp 21-15

C. The DEIR's Project Description Improperly Excludes the Cleanup of the Centennial Site from the Project Scope.

The DEIR also lacks an adequate project description because it wrongly excludes the Centennial cleanup from the scope of the Project. CEQA requires that an EIR contain an accurate and comprehensive project description which contains enough detail to allow informed analysis of environmental effects. *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; CEQA Guidelines § 1512. "[A] correct determination of the nature and scope of the project is a critical step in complying with the mandates of CEQA." *Nelson v. County of Kern* (2010) 190 Cal.App.4th 252, 267 (citing *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222. "The entirety of the project must be described, and not some smaller portion of it." *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 654 ("*County of Merced*").

Under CEQA, a "project" is an activity that may cause either a direct or reasonably foreseeable indirect change in the environment, and that involves the issuance of a permit or other entitlement for use by one or more public agencies. Pub. Resources Code § 21065. The project includes the "whole of an action," and "does not mean each separate governmental approval." CEQA Guidelines § 15378(a), (c). Where two actions are integrally related or where one action is conditioned on another action, they must both be considered together as one project in a single EIR. *Nelson*, 190 Cal.App.4th at 271; *Tuolumne County Citizens*, 155 Cal.App.4th at 1222. When "an individual project is a necessary precedent for action on a larger project, or commits the lead agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project." CEQA Guidelines § 15165.

Segmenting a portion of a project from the whole is forbidden under CEQA. *Assn. for Sensible Development of Bishop Area v. County of Inyo* ("*County of Inyo*") (1985) 172 Cal.App.3d 151, 165-66 (*County of Inyo*"). A project applicant cannot "file separate environmental reports for the same project to different agencies thereby preventing 'consideration of the cumulative impact on the environment.'" *Nelson*, 190 Cal.App.4th at 271 (internal citation omitted). "CEQA's conception of a project is broad," and it "prevents a proponent or a public agency from avoiding CEQA requirements by dividing a project into smaller components which, when considered separately, may not have a significant environmental effect." *Id.* (citations omitted). Such piecemeal environmental review that breaks up projects into smaller pieces to evade a complete impact analysis therefore violates CEQA. *See Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180, 193; *Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283.

Here, the DEIR's project description violates CEQA because it improperly excludes the cleanup of the Centennial Site from the scope of the Project, wrongly contending that this cleanup is separate from the Project. DEIR at 3-10; *see* Exhibit A (Baseline Report) at 3. The project description states that the Project would involve dumping 1.6 million tons of mine waste on a 44-acre area of the 56-acre Centennial Site over a period of five years. *Id.* at 3-32 to 3-33. However, as discussed above, the Centennial Site is currently contaminated with arsenic, lead, thallium, mercury, and nickel. *Id.* at 4.7-3. Because of this existing pollution and unstable soil

conditions, the DEIR acknowledges that the Centennial Site cannot be redeveloped until the contamination is remediated by Rise Gold in accordance with an RAP approved by DTSC. *Id.* at 3-10, 3-33. Despite this, the DEIR asserts that "[t]he environmental cleanup work at the Centennial Industrial Site [carried out by the Applicant] under the DTSC voluntary cleanup program . . . is not a component of the proposed project." *Id.* This is incorrect.

The Applicant's cleanup of the Centennial Site proposed in the RAP is a necessary first step toward using the site as a dumping ground for "engineered fill" from the Project. The DEIR acknowledges that the Project includes dumping waste rock excavated from the mine onto the Centennial Site. *Id.* at 1-3, 3-26, 3-28, 3-32 to 3-33. It states that after "environmental cleanup work is completed [at the Centennial Site] and a No Further Action letter is issued by DTSC, engineered fill from the Brunswick Industrial Site would be placed, graded, and compacted on the Centennial Industrial Site" as part of the Project. *Id.* at 3-33. The DEIR also states that one of the Project objectives is to "[i]ncrease the usable land area at the Centennial Industrial Site to allow its future use as industrial land." *Id.* at 3-12. The DEIR therefore calls for a "Reclamation Plan" in which the engineered fill at the Centennial Site would be graded into a "pad" for future industrial development after dumping is complete, and the remainder of the site would be revegetated. *Id.* at 3-42, 3-46. Since the DEIR acknowledges that the Applicant's remediation of the Centennial Site is a necessary prerequisite to the Project's proposed dumping on the site and the site's eventual reclamation for industrial use (*id.* at 3-10, 3-33), the DEIR's claim that this remediation is not part of the Project is incorrect. The Centennial Site remediation will be carried out by the Applicant to facilitate the use of the site for the proposed Project.

The Centennial RAP itself demonstrates that the RAP should be considered part of the Project. The RAP repeatedly refers to work to be done on the Centennial Site that goes beyond remediation, but rather is intended to prepare for the future stages of the IMM Project. The RAP acknowledges that "[p]ost-remediation use of the property" includes "the placement of additional mine waste . . . resulting from future mining operations." Exhibit C (RAP) at 19. It states that contaminated materials on the site "are to be reworked in place as engineered fill and covered with clean engineered fill *to prepare the site for future commercial/industrial site development*." *Id.* at XVIII (emphasis added); *see also id.* at 39, 45. Because the RAP is not solely focused on remediating the Centennial Site, but rather is intended to prepare the site for future use in the IMM Project, the RAP is a part of the IMM Project. Recognizing that the two actions are integrally related, DTSC acknowledges that it is considering "combining the [environmental review for the Centennial RAP] project with the IMM EIR." *See* Email from Dean Wright, Project Manager, DTSC, to Ralph Silberstein, February 4, 2022, attached as Exhibit D. Moreover, the Central Valley Regional Water Quality Control Board (RWQCB) has called for exactly that approach, commenting that "the cumulative impacts to water quality incurred by the project described in the [Centennial] RAP and potential future discharge of mine waste generated by the proposed Idaho-Maryland Mine-Rise Grass Valley project should be considered in a single environmental document." *See* Central Valley RWQCB, Review of Draft Final Remedial

Action Plan Centennial M-1 Property, Nevada County, September 24, 2021, attached as Exhibit E, at 5.

In determining whether a particular action should be considered part of a CEQA project, courts "examine how closely related" the action is "to the overall objective of the project." *Tuolumne County*, 155 Cal.App.4th at 1226. "The relationship between the particular act and the remainder of the project is sufficiently close when the proposed physical act is among the 'various steps which taken together obtain an objective.'" *Id.* In *Tuolumne County*, because the objective of the project was to open and operate a home improvement center, and that objective was "conditioned upon the completion of the realignment of a road," the road realignment was deemed part of "a single CEQA project" with the proposed home improvement center. *Id.* at 1227. In *Nelson*, the court invalidated a mitigated negative declaration that reviewed only a mining reclamation plan for a proposed mining project while excluding the associated surface mining operations from the review. 190 Cal.App.4th at 269, 272. The court held that "the entire CEQA project that had to be reviewed by the County included *both* the mining operations and the reclamation plan," because "both aspects were integrally related and constituted the whole of the action" for which approvals were sought. *Id.* at 272. The reclamation plan "was simply the final phase of the overall usage of the land." *Id.*

Here, as in *Tuolumne County* and *Nelson*, the remediation of the Centennial Site is an essential step which the Applicant must take in order to accomplish the objectives of the IMM Project. The DEIR acknowledges that the IMM Project's proposed dumping of engineered fill on the Centennial Site cannot occur until the site is remediated under the RAP. DEIR at 3-10, 3-33. The Centennial cleanup is also necessary to achieve the stated IMM Project objective to "[i]ncrease the usable land area at the Centennial Industrial Site to allow its future use as industrial land." *Id.* at 3-12. Accordingly, the Centennial RAP is an integral part of the IMM Project, and the RAP's exclusion from the Project description (*id.* at 3-10) violates CEQA.

The DEIR argues that the Centennial RAP should not be considered a part of the IMM Project for several reasons, all of which are meritless. *Id.* at 1-7 to 1-8. First, the DEIR asserts that "the Idaho-Maryland Mine Project can proceed independently from the Centennial Clean-Up Project, even if the Centennial Clean-Up Project is not completed within the term of the mining permit, in which case, material from the Idaho-Maryland Mine Project would not be placed on the Centennial Industrial Site." *Id.* at 1-7. The DEIR thus denies that the RAP is an essential prerequisite to the IMM Project. *Id.* at 1-8. But while it may be true that the IMM Project does not need the Centennial Site for disposal of waste rock from the mine, since that material can be dumped on the Brunswick Site or disposed of elsewhere, the same is not true for the Project's other goals. The IMM Project commits to reclamation of the Centennial Site for future industrial use. *Id.* at 3-42, 3-46. As noted above, the Centennial RAP is a necessary prerequisite to achieving the IMM Project objective to "[i]ncrease the usable land area at the Centennial Industrial Site to allow its future use as industrial land." *Id.* at 3-12. Even if the Applicant never

dumps any mine waste on the Centennial Site, the Applicant cannot abandon its commitment to reclaim the Centennial Site without altering the basic nature of the IMM Project.

Second, the DEIR argues that "[t]he utility and purpose of the Centennial Clean-Up Project is to ensure timely and efficient cleanup of the Centennial Industrial Site due to existing site conditions, and is required under both California and federal environmental regulations—not because it would benefit the Idaho- Maryland Mine Project. . . the Centennial Clean-Up Project would happen whether or not an underground mine is approved by Nevada County for the Brunswick Industrial Site." DEIR at 1-7. But as discussed above, the Centennial RAP itself clearly indicates that it is intended to prepare the site for future placement of engineered fill as part of the IMM Project, and eventual reclamation for industrial use. Exhibit C (RAP) at 19, 39, 45. One of the purposes of the RAP *is* to benefit the IMM Project. Moreover, the DEIR notes that the Applicant, Rise Gold, has entered a "Voluntary Cleanup Agreement" with DTSC "for the voluntary cleanup of soil contamination on the Centennial Industrial Site," and that the RAP has been prepared pursuant to that agreement. DEIR at 1-4, 3-10; *see* Exhibit C (RAP) at xii. The Voluntary Cleanup Agreement states that the Applicant "reserves the right to unilaterally terminate this Agreement for any reason" after 30 days' notice. Voluntary Cleanup Agreement at 5, Section 18.1, attached as Exhibit F. Rise Gold would not have entered the Voluntary Agreement to undertake the Centennial cleanup and its associated costs if it did not serve the Applicant's ultimate goal of dumping fill on the site as part of the IMM Project. If the IMM Project does not go forward, the Applicant could withdraw from its commitment to the Centennial cleanup.

The DEIR argues that the Centennial RAP should be analyzed separately because the situation here allegedly resembles that in *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1223. DEIR at 1-7 to 1-8. But that case is factually inapposite. In *Banning Ranch*, a City proposed building a park and associated access road, which was reviewed in one EIR, while another EIR reviewed a residential subdivision proposed by a private developer on adjacent property, which called for a much larger access road in the same location. 211 Cal.App.4th at 1216-17. While the projects would share the same access road, neither project depended on or assumed completion of the other project. *Id.* at 1218-19. The court found that there was no piecemealing because these two projects had different proponents and served different purposes, and because the park's smaller access road was only a "baby step" towards the residential project. *Id.* at 1225-26. Here, by contrast, both the Centennial cleanup and the remainder of the IMM Project have the same project proponent, Rise Gold, and share the objective of making the Centennial Site suitable for industrial development, as discussed above. Unlike *Banning Ranch*, the Centennial cleanup is a necessary prerequisite to the dumping of engineered fill from the IMM Project, and the DEIR assumes that the cleanup will occur.

Grp 21-16

Segmenting the IMM Project from the Centennial RAP also prevents a full environmental analysis of the combined impacts of the RAP and the subsequent dumping of fill on the site. For example, this piecemeal approach risks understating the impacts to wetlands on the Centennial

Site. The Centennial RAP plans to excavate clean fill from portions of the Site that are not contaminated and to use this fill to cap the contaminated areas. Exhibit C (RAP) at xx, 63. The RAP states that it could destroy up to 4.35 acres of wetlands on the site, which may be mitigated via onsite wetland restoration or creation. *Id.* at 60. The Initial Study/Mitigated Negative Declaration (MND) for the RAP contends that impacts on these wetlands will be less than significant following mitigation. MND at 29, attached as Exhibit G. The IMM Project, in turn, plans to dump mine waste on 44 acres of the 56-acre Centennial Site, avoiding only 12 acres that include Wolf Creek, a 100-foot setback from the Creek, and areas containing certain sensitive plant species. DEIR at 3-15. Because the IMM Project and Centennial RAP are analyzed piecemeal in separate documents, it is impossible for the public to determine whether wetlands impacted by the RAP would be further impacted by the dumping of fill from the IMM Project, or whether that dumping would destroy or impair wetland mitigation proposed as part of the RAP.

Grp 21-17

The DEIR ignores the reality that the Centennial RAP is an integral part of the IMM Project, and improperly segments the Project by excluding the cleanup. This piecemeal description prevents an analysis of the IMM Project as a whole, and therefore violates CEQA. The DEIR's project description must be revised to recognize the cleanup of the Centennial Site as an integral part of the Project, and DEIR must analyze all of the environmental effects of the RAP as part of the Project.

D. The DEIR Lacks a Stable and Complete Project Description.

Grp 21-18

In addition to omitting the Centennial RAP and equivocating as to whether the cleanup will happen, the DEIR's project description is also unstable and incomplete in other respects. An accurate, stable and finite project description is an essential component of an informative and legally sufficient EIR. *San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 730. Here, the Project description is incomplete because it fails to adequately describe the duration of required water quality permits, and the DEIR fails to consistently describe mining and exploration activities over the entire permit period. Moreover, the DEIR does not consistently describe the duration of Project construction.

The Conditional Use Permit (CUP) for the Project would span 80 years. DEIR at 3-12, 3-28, 3-47. The Project also requires several different types of Water Board permits (*see id.* at 3-15, 3-18, 3-52), none of which would have anything approaching an 80-year time frame. For example, under the federal Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permits for discharges to surface water expire every five years unless renewed. 40 C.F.R. § 122.46. As discussed in the hydrology and water quality section of this letter, Section II.A, *infra*, the DEIR relies on compliance with these regulatory requirements and permits to conclude that the Project's impacts would be less than significant. Yet the DEIR fails to clearly describe the timeframe of these Water Board permits, nor does it make any attempt to reconcile

an 80-year CUP with Water Board permits that may expire every five years. This informational deficiency makes the project description inadequate.

Grp 21-19

The DEIR also relies on a shifting project description. Despite the DEIR's clear statement that the Project's permitted mining operations would span 80 years (DEIR at 3-12, 3-28, 3-47), the DEIR's hydrology and water quality analysis refers to a 2045 "base-case" mining scenario. It states that the proposed mining plan or "base-case" scenario evaluated by the Applicant's consultant Itasca Denver, Inc. represents the exploration target over a 25-year period based on historic mapping and drill core sampling conducted to date. *Id.* at 4.8-55. Neither the Project description nor the hydrology chapter explain the basis for this "base-case scenario" or how it is compatible with the Project's 80-year timespan. Relatedly, the DEIR's hydrology and water quality chapter contains a section on "potential future exploration and mining" that discusses "possible future mining scenarios" that would extend from 26 years to 60 years after Project approval. This "additional, deeper exploration and mining" may occur as part of the Project within the 2,585-acre mineral rights boundary owned by Rise. *Id.* at 4.8-62. Once again, the DEIR's project description makes no mention of this potential future exploration and mining. The DEIR fails to explain where exactly this future exploration and mining would occur, what it would entail, and how it would relate to the 80-year conditional use permit for the Project. This omission violates CEQA. *See San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 730.

Grp 21-20

Finally, the DEIR provides an inconsistent description of the Project construction period. The DEIR's project description states that Project construction would last for 18 months. DEIR at 3-37. By contrast, the DEIR's air quality, GHG, and energy chapter assumes that Project construction would last for only 12 months, and bases its impact analyses on that assumption. *Id.* at 4.3-44 to 4.3-46, 4.3-66 to 4.3-67, 4.3-74, 4.3-92. The DEIR is therefore internally contradictory and improperly minimizes the Project's significant impacts. "[S]uch an unexplained discrepancy precludes the existence of substantial evidence" for the EIR's conclusions. *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 284. The DEIR must be revised so that the project description and the impact analyses consistently describe the duration of construction activities.

II. The DEIR's Fails to Adequately Analyze and Mitigate the Project's Environmental Impacts.

Grp 21-21

The discussion of a proposed project's environmental impacts is at the core of an EIR. *See* CEQA Guidelines §15126.2(a) ("[a]n EIR shall identify and focus on the significant environmental effects of the proposed project"). As explained below, the DEIR's environmental impacts analysis is deficient under CEQA because it fails to provide the necessary facts and analysis to allow the County and the public to make informed decisions about the Project. An EIR must effectuate the fundamental purpose of CEQA: to "inform the public and responsible

officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123 ("*Laurel Heights II*"). To do so, an EIR must contain facts *and* analysis, not just an agency's bare conclusions. *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 568. Thus, a conclusion regarding the significance of an environmental impact that is not based on an analysis of the relevant facts fails to fulfill CEQA's informational mandate.

Additionally, an EIR must identify feasible mitigation measures to mitigate significant environmental impacts. CEQA Guidelines §15126.4. Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Pub. Resources Code § 21002.

Although it is clear that the proposed Project has the potential to cause extraordinary environmental degradation, neither the public nor decisionmakers have any way of knowing the magnitude of this harm. As we explain below, the DEIR fails to provide detailed, accurate information about the Project's significant environmental impacts and to analyze mitigation measures or project alternatives that would reduce or avoid such impacts.

A. The DEIR Fails to Adequately Analyze and Mitigate the Project's Hydrology and Water Quality Impacts.

1. The DEIR Does Not Adequately Analyze or Mitigate the Project's Impacts on Domestic Water Supply Wells.

Grp 21-22

The proposed Project would intentionally affect local groundwater resources by dewatering the aquifer in the Project vicinity to lower groundwater levels. According to Baseline's hydrogeologist, Bruce Abelli-Amen, mine workings would essentially act as an enormous groundwater extraction well that would be pumped continuously for the Project's duration, i.e., 80 years. Exhibit A (Baseline Report) at 4, 5. The mine's groundwater levels would be lowered by over 3,000 feet. DEIR at 4.5-55. Despite this massive dewatering operation, the DEIR fails to accurately evaluate how this loss of water would affect groundwater levels. Consequently, the document also fails to adequately evaluate the effect on residences and businesses in the Project vicinity that rely solely on private groundwater wells for their water supply.

(a) The DEIR Fails to Accurately Describe Existing Hydrologic Conditions in the Project Study Area.

Grp 21-23

The DEIR's analysis of impacts on domestic water supplies fails from the outset because it lacks an adequate description of existing hydrological conditions. As discussed above, an accurate depiction of existing environmental conditions is critical to a complete assessment of

project impacts. First, as the DEIR admits, "baseline groundwater levels" have yet to be established. *See* DEIR Mitigation Measure 4.8-2(a) (p. 4.8-67), stating "[F]or each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings." Until the DEIR identifies baseline groundwater levels absent the Project, it is not possible to evaluate how mining operations will impact groundwater levels and domestic water supply wells.

Grp 21-24

Second, the DEIR provides no evidence that the hydrologic analysis covers the full geographic area where impacts might occur. CEQA requires that an EIR must analyze environmental impacts over the entire area where one might reasonably expect these impacts to occur. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721-23. This principle stems directly from the requirement that an EIR analyze all significant or potentially significant environmental impacts. Pub. Resources Code §§ 21061, 21068. An EIR cannot analyze all such environmental impacts if its study area does not include the geographical area over which these impacts will occur. Here, the DEIR states that "drawdowns of the water table are *generally* within the mineral rights boundary." DEIR at 4.8-58 (emphasis added). By including the word "generally," the DEIR admits to being uncertain about the geographic extent of where drawdowns might occur. Moreover, the DEIR provides no explanation as to how it determined that drawdowns would likely be limited to the area within the mineral rights boundary. As discussed below and as elaborated on in the Baseline Report, the area surrounding the Project site contains a fractured bedrock system which affects groundwater occurrence and flow. Exhibit A (Baseline Report) at 6, 7. Due to this complex hydrogeologic environment, it is certainly possible for drawdowns of the water table to extend beyond the mineral rights boundary. Until the DEIR accurately identifies where drawdowns would occur, the DEIR cannot provide a full and accurate accounting of the Project's hydrologic impacts.

Grp 21-25

Baseline Environmental echoes this concern, explaining that the Applicant does not intend to monitor water levels in the actual water supply wells at overlying and nearby residences and businesses that may be affected by the Project. Instead, the Applicant proposes to install 15 monitoring wells across the Project site. Exhibit A (Baseline Report) at 11. According to Baseline, there are likely hundreds of supply wells in the region. It is possible that some of these wells are just barely satisfying the well owners' needs under existing conditions, and that any reduction to their water level caused by the Project's operations could lead to water levels dropping below the well pump intake. *Id.* at 10. However, because the DEIR does not cast its geographic net widely enough, the potential impacts to well users caused by the Project's operations remain undisclosed. The DEIR must be revised to correct these deficiencies and then recirculated for public review and comment.

(b) The DEIR Lacks Thresholds of Significance for Evaluating the Project's Impacts on Groundwater Supplies.

CEQA's most basic purpose is to inform governmental decisionmakers and the public about the potentially significant environmental effects of a proposed project. CEQA Guidelines § 15002 (a) (1); 40 C.F.R. § 1500.1(b). Determining whether a project may result in a significant adverse environmental effect is one of the key aspects of CEQA. Guidelines § 15064(a) (determination of significant effects "plays a critical role in the CEQA process"). CEQA specifically anticipates that agencies will use thresholds of significance as an analytical tool for judging the significance of a Project's impacts. *Id.* § 15064.7. The determination of significance "is critical, because once 'significant effects' have been identified in the EIR, an agency must explore implementing feasible mitigation measures or alternatives to avoid or reduce the effect." *Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1373.

Thus, one of the first steps in any analysis of an environmental impact is to select a threshold of significance and to support this threshold with substantial evidence. CEQA Guidelines § 15064.7 (b). Here, the DEIR contains no thresholds of significance for the Project's impacts on groundwater supplies. This flaw leads to a cascade of other failures: without a threshold, the DEIR cannot identify whether a particular effect will be significant and it cannot identify adequate mitigation to address that impact. In short, the DEIR cannot do its job. Thus, although the DEIR ultimately asserts that the Project would potentially impact groundwater supplies, the document provides no standard by which to evaluate this impact's significance.

Grp 21-26

This defect becomes most apparent when reviewing Mitigation Measure 4.8-2 (b): "If, based on the [Groundwater Monitoring Plan], it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted." DEIR at 4.8-68.

Although the DEIR never states this, it appears that the authors are relying on this 10 percent reduction figure as an ad hoc threshold of significance. The problem is that the DEIR provides no justification for this arbitrary number. Exhibit A (Baseline Report) at 10. Indeed, although Mitigation Measure 4.9-2(b) references Nevada County General Plan Policy 17.12, nothing in this policy mentions a 10 percent reduction criterion. This 10 percent figure is almost meaningless because, as discussed above, it is certainly possible that of the hundreds of supply wells in the region, some of them are just barely satisfying the well owners needs under existing conditions, and *any* reduction could lead to adverse impacts on area wells.

It is therefore critically important that the revised DEIR identify thresholds of significance, based on substantial evidence (i.e., data related to the characteristics and function of

the existing domestic wells in the Project study area). The DEIR's failure to include this information is fatal flaw requiring that the DEIR be revised and recirculated.

(c) The DEIR Does Not Accurately Evaluate the Project's Impacts Because It Relies on a Flawed Groundwater Model.

The DEIR relies on a numerical groundwater model to assess the Project's impacts on groundwater levels and specifically to determine which private wells would experience excessive drawdown. Experts agree that these models can be inaccurate and unreliable under the best of circumstances. As Baseline explains,

> Accurately characterizing the flow patterns and behavior of groundwater using mathematical equations (models) is a challenging endeavor in any geologic environment. The types of hydrogeologic systems that are most readily modeled accurately are uniform (homogeneous), isotropic (consistent structure from place to place) rock and or sediments, like a uniform unfractured sandstone where water flows slowly through pore spaces around the grains of the geologic material.
>
> Groundwater occurrence and flow within complex fractured bedrock systems, like those that occur at the project site, are exceedingly difficult to model with accuracy or reliability. It is widely known by practitioners in the hydrogeologic community that accurate prediction of groundwater behavior in fractured bedrock using groundwater models, where most of the flow occurs within the unknowable sets of primary and secondary fracture patterns, rarely occurs.

Grp 21-27

Exhibit A (Baseline Report) at 6, 7.

In addition to the inherent uncertainties of relying on models to predict groundwater impacts in a complex hydrogeologic environment such as this one, Baseline identified numerous deficiencies in the DEIR's groundwater model. For example, the model was calibrated based on pumping rates from the historical Idaho-Brunswick Mine and only one water level measurement was collected from the flooded (i.e., inactive) Union Hill shaft in 1956. Using only one water level measurement to calibrate a complex bedrock aquifer system over a large region introduces a significant amount of uncertainty to the model. Exhibit A (Baseline Report) at 7. Moreover, as Baseline explains, based on the DEIR's appendix, there is a poor hydraulic connection between the two mines, which suggests the water level measurement collected from the Union Hill Shaft is not ideal for calibrating the groundwater model. *Id.*

Grp 21-28

Nor does the model describe how drawdown would be determined relative to baseline conditions. Private domestic wells in the Project vicinity have seasonal fluctuations that may vary from 10 to 50 feet between wet and dry seasons. Exhibit A (Baseline Report) at 11 (citing DEIR Appendix K.3 at 7).The DEIR provides no explanation as to how these seasonal water fluctuations would be distinguished from Project-related drawdown.

Grp 21-29

Nor does the groundwater model accurately account for the groundwater depression that will be created by the constant drainage from the existing mine workings. As Baseline explains, calibrating the groundwater model without incorporating the proper mechanisms to simulate the drainage of groundwater from existing mine workings could introduce substantial error to the overall modeling results. Exhibit A (Baseline Report) at 8.

These and other deficiencies identified in the Baseline Report demonstrate that the DEIR's groundwater model likely does not accurately and reliably predict the Project's groundwater impacts. Indeed, even the water resources expert retained by the Applicant expressed concerns about the reliability of the DEIR's groundwater model's results. *See* Exhibit A (Baseline Report) at 7.

Grp 21-30

Finally, the DEIR calls for a Groundwater Monitoring Plan (GMP) that calls for the collection of groundwater-level information. DEIR at 4.8-67. But the GMP does not propose to monitor water levels in the actual water supply wells at overlying and nearby residences and business that may be affected by the Project. Instead, as discussed above, it proposes to install monitoring wells across the Project site at 15 different locations. Exhibit A (Baseline Report) at 11, 12 (citing the GMP at 1). The DEIR never explains how the placement of 15 monitoring wells in complex fractured bedrock spread over thousands of acres of land could provide sufficient data to evaluate the Project's impacts on residences and businesses. As Baseline explains, a monitoring well could be placed in proximity to an existing supply well and respond very differently to changing water levels in the mine during dewatering if a water-bearing bedrock fracture intersects one of the wells, but not the other. Exhibit A (Baseline Report) at 12.

Grp 21-31

Based on the flawed groundwater model output, the DEIR concludes that wells only within the East Bennett area could be affected and that impacts in all other areas would not be significant. DEIR page 4.8-62. Specifically, the DEIR determines that the Project would impact just seven supply wells in the East Bennett area during the 80-year life of the mining operation. DEIR at 4.8-66. The DEIR further notes that while only seven wells are projected to be affected, the Project would install a potable water supply line and connect up to 30 properties in the same area to the Nevada Irrigation District potable water as part of a Well Mitigation Plan. DEIR at 4.8-66, 4.8-68 (Mitigation Measure 4.8-2(c).

However, for the reasons discussed above, and as Baseline confirms, the DEIR lacks evidentiary support that the Project would not significantly impact residences and businesses (i.e., beyond the impacts to the seven supply wells that the DEIR does disclose or the 30

properties that may be retrofitted with a water supply line). Exhibit A (Baseline Report) at 12. And as discussed below, the DEIR's mitigation measures are flawed and incapable of lessening the Project's significant impacts.

2. The DEIR's Mitigation Measures Would Not Mitigate the Project's Groundwater Impacts.

Grp 21-32

The primary goal of an EIR is to identify a project's significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. Pub. Resources Code §§ 21002.1(a), 21061.The lead agency must adopt all feasible mitigation measures that can substantially lessen the project's significant impacts, and it must ensure that these measures are enforceable. *Id.*, § 21002; CEQA Guidelines §§ 15002(a)(3), 15126.4(a)(2); *City of Marina v. Bd. of Trustees of the Cal. State Univ.* (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures "that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." *Federation of Hillside and Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); CEQA Guidelines § 15126.4(a)(2). The DEIR fails to comply with these requirements.

The DEIR relies on three mitigation measures to conclude that the Project's impacts on groundwater supplies would be less than significant. None of these measures would effectively reduce the Project's impacts. Mitigation Measure 4.8-2 (a) calls for the Project's GMP to be implemented prior to the dewatering of the mine. Mitigation Measure 4.8-2(b)calls for the provision of supplemental water from the Nevada Irrigation District if any wells experience a 10 percent reduction in water. Mitigation Measure 4.8-2(c) calls for the connection of 30 properties to the Nevada Irrigation District (NID) potable water system. DEIR at 4.8-67 to 4.8-68. For the reasons discussed below, all three measures are deficient.

Grp 21-33

The DEIR explains that in order to implement the GMP, the Applicant must collect additional groundwater level data and then perform a water-level assessment for individual wells. These steps are necessary in order to evaluate *baseline* groundwater level conditions and to determine the Project's impacts on individual domestic wells. DEIR at 4.8-67. This post-approval data collection and impact analysis constitutes an inappropriate deferral of mitigation. "Formulation of mitigation measures should not be deferred until some future time." CEQA Guidelines § 15126.4(a)(1)(B). However, where mitigation for an impact "is known to be feasible," but where "practical considerations prohibit devising such measures early in the planning process," an agency "can commit itself to eventually devising mitigation measures that will satisfy specific performance criteria articulated at the time of project approval." *Cleveland Nat. Forest Foundation v. San Diego Assn. of Govs.* (2017) 17 Cal.App.5th 413, 442-43. In order to defer formulation of mitigation measures, therefore, an agency must demonstrate (a) that mitigation of the impact is feasible; (b) that practical considerations preclude devising measures at the time of review; (c) specific, articulated performance criteria that will avoid or lessen the

impact; and (d) a binding commitment to adopt measures that will meet or exceed those performance standards. Here, the DEIR does not meet these criteria.

Of paramount concern is the DEIR's failure to include performance criteria that will avoid or lessen the Project's impacts. As discussed above, the DEIR lacks thresholds of significance. Without thresholds of significance, the DEIR is unable to identify performance standards. To the extent that the DEIR preparers intend to suggest that Mitigation Measure 4.8-2(b) (Applicant will supply water to those wells that experience a 10 percent or greater reduction in water), constitutes a performance standard, it cannot do so. As discussed above, and as elaborated fully in the Baseline Report, the DEIR does not provide any factual support for its 10 percent figure. Exhibit A (Baseline Report) at 10-11. And, again, until the DEIR accurately describes existing conditions for the properties that rely exclusively on well water, the DEIR has no basis to conclude that any reduction in the amount of water caused by mining operations would not result in significant impacts. *Id.*

Mitigation Measure 4.8-2 (c) is equally problematic. Here, the DEIR calls for the connection of 30 properties to the NID water system. Again, this measure fails at the outset because there is nothing in the DEIR to suggest that the Project's impacts would not exceed 30 properties. Nor does the DEIR provide any evidence as to how this measure would reduce impacts. Courts will not defer to an agency's conclusions about the effectiveness of a mitigation measure where, as here, the measure's efficacy in reducing an impact is not apparent and there is no evidence in the record showing that it will be effective. *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 866, 875-76. As Baseline explains, to effectively ensure there is no discontinuation of water service to potentially affected users, this mitigation measure should include, at a minimum, the following components:

Grp 21-34

- Completion of a detailed water supply well inventory for all wells within the Mineral Rights Boundary, plus a substantial buffer zone;
- Investigation of all available details about each potentially affected well such as the construction design (i.e., depth, diameter, screened interval); type and use of the well (e.g., domestic, irrigation, industrial, etc.); water demand (installing totalizer meters if necessary to determine water use); and recharge rates (installing pressure transducers if necessary to monitor drawdown and recharge); and seasonal variations in water levels; and
- Development of a plan for each well to ensure that an immediate alternate water supply can and will be provided should an impact to that well occur. This plan must include provisions to ensure alternate water supplies will be provided throughout the 80-yearlife of the Project and beyond.

Grp 21-35

In addition, we direct the County to Safeguards for Well Owners and the Idaho-Maryland Mine, CEA Foundation, December 1, 2021, attached as Exhibit H. This document outlines recent permitting history at the Idaho-Maryland Mine and raises additional deficiencies in the DEIR's flawed approach to groundwater protection. This document explains that the 1996 Emperor Gold project was less impactive than the proposed Project but offered far more substantive protections for area wells. Mitigation Measure 4.8-2 must be revised to include, at a minimum, the safeguards identified in this document.

Grp 21-36

Finally, it is important to note that, because Baseline has determined that the Project would threaten water supplies in the area, the Project is inconsistent with Nevada County General Plan Policy 17.12. This policy places the burden of proof on the Applicant to show that a mining operation did not create the water problem and requires the Applicant to remedy the water problem.[3]

3. The DEIR Does Not Adequately Analyze or Mitigate the Project's Groundwater Quality Impacts.

Water samples from the New Brunswick shaft and drains reveal that groundwater and surface water quality are already severely degraded. *See* DEIR at 4.8-21, 4.8-22 stating that primary constituents of interest from these water samples are iron and manganese. Arsenic has also been detected above regulatory limits as has the compound cis-1,2- dichloroethylene (DCE). *Id.* Other contaminants of concern include ammonia, hexavalent chromium, pH, total suspended solids, antimony, copper and nitrate. *See* David M. Chambers' Report, submitted under separate cover.

Grp 21-37

The Project's construction and operations involve multiple activities that could result in adverse effects to water quality, including but not limited to the discharge of mine water containing iron and manganese, discharge of construction area dewatering water, erosion and sedimentation associated with the placement of engineered fill at the Centennial and Brunswick Sites, and use of cemented-paste backfill in the underground workings. DEIR at 4.8-51.

Instead of fully evaluating the Project's water quality impacts, which would require a detailed analysis of the operational water quality treatment processing, including modeling water quality, the DEIR effectively assumes that no such impacts would occur because the Applicant would be required to comply with water quality standards and waste discharge requirements.

[3] *See* Chapter 17, Mineral Management, of the Nevada County General Plan; available at: https://www.mynevadacounty.com/DocumentCenter/View/12589/Chapter-17-Mineral-Management-1995-PDF; accessed March 3, 2022.

DEIR at 4.8-45, 4.8-52, 4.8-53.[4] This "trust us" approach is not sufficient to mitigate a potentially significant impact. Under well-established case law, compliance with existing policies and regulations does not excuse the agency from describing project activities or from analyzing resulting impacts. *See Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09 (environmental effect may be significant despite compliance with such requirements). To simply assert that water quality standards will be met is not sufficient for the public or decisionmakers to assess either the adequacy of water treatment methods proposed or the adequacy of the standards proposed for the discharge permit.

Grp 21-38

Moreover, although the Project entails a conditional use permit (CUP) that will span 80 years, the DEIR makes no attempt to reconcile the timeframe of the CUP with water quality permitting. As discussed above, the Applicant will need to obtain several different types of Water Board permits, none of which would have anything approaching an 80-year time frame. For example, NPDES permits for discharges to surface water expire, unless renewed, every five years per the federal Clean Water Act. 40 C.F.R. § 122.46. The DEIR provides no evidence that water quality will be protected for the entire 80-year Project duration given the timeframes of the various Water Board permitting requirements.

The extensive flaws in the DEIR's analysis of groundwater supply and groundwater quality impacts requires that the DEIR be comprehensively revised and recirculated.

B. The DEIR Fails to Adequately Analyze and Mitigate the Project's Noise and Vibration Impacts.

Grp 21-39

The Project's activities are expected to generate substantial noise levels. Many of these operations would generate noise levels of 85 dBA and begin early in the morning and extend into the evening. Certain operations would occur 24 hours per day for 80 years (*see e.g.*, above ground facility operations (gold mineralization processing)). Other operations, including the offsite hauling of gold concentrate and "engineered fill," would begin at 6:00 a.m. and run until 10:00 p.m. seven days a week. DEIR at 3-26; 3-37; 4.10-31. Although tunneling and blasting would occur throughout the Project's 80-year duration, the DEIR does not identify the hours of these operations. All of these mining operations would occur in a rural residential area and as close as 300 feet from the nearest residence. DEIR at 3-11, 3-15, 4.10-33.

Grp 21-40

Despite the potential for severe noise and vibration impacts, the DEIR's analysis of and mitigation for these impacts is utterly deficient. The DEIR's failure to accurately account for and disclose all of the Project's noise and vibration impacts prejudicially impairs the ability of

Grp 21-37

[4] Although DEIR Chapter 4.8, Hydrology and Water Quality, includes numerous references to the groundwater supply model, we could find no indication that any modeling was conducted to evaluate the Project's impacts on water quality.

decisionmakers and the public to understand how the Project would affect the surrounding community.

1. The DEIR Declines to Conduct Impact Analyses Relying on the Flawed Premise that the Project Would Be Required to Comply with County Standards.

The DEIR repeatedly asserts that the Project would not have significant noise impacts because it would be required to comply with generalized County noise standards. *See* Tables 4.10-12, 4.10-13, 4.10-14. Yet, mere compliance with the County's standard does not necessarily mean noise impacts are insignificant. *Oro Fino Gold Mining Corporation v. County of El Dorado* (1990) 225 Cal.App.3d 872, 881-82. The proper question is not the relative amount of noise resulting from the Project, but "whether any additional amount of [] noise should be considered significant" in light of existing conditions. *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025-26. In *King and Gardiner Farms*, the court recently rejected a noise analysis that concluded that a project's impacts would be insignificant simply because they complied with the County's noise ordinance and general plan. Of particular importance here, the court found the "conclusion that conformity with the absolute or maximum noise level specified in a general plan does not prevent a fair argument from being made that the proposed project will generate environmentally significant noise impacts." 45 Cal.App.5th 814, 887. Rather, as established in *Keep Our Mountains Quiet v. County of Santa Clara*, "the lead agency should consider both the increase in noise level and the absolute noise level associated with a project." (2015) 236 Cal.App.4th 714, 733.

Grp 21-41

Here, the rural-residential noise setting is exceptionally quiet. The median/L50 noise levels indicate that people in the area enjoy noise levels below 40 dBA to 50 dBA 50% of the time (specifically, 50% of each hour). Exhibit B (Salter Report) at 4. In addition, residents in the area are currently located away from notable sources of ambient noise and thereby currently enjoy very low nighttime background noise levels between 30 dBA and 45 dBA. *See Id.* at 2, (citing DEIR Appendix L, Appendix B-1).

In light of this very quiet ambient environment, the DEIR should have thoroughly examined the Project's potential to generate nighttime noise. Unfortunately, it does no such thing. The DEIR asserts that because the Project's on-site noise sources must comply with the County's nighttime noise level standards, an evaluation of sleep disturbance is not warranted. DEIR at 4.10-23. This assertion is absurd. The Project includes many operations that will occur during early morning or nighttime hours, including dewatering, indoor facility construction, truck loading/unloading and off-site hauling mineralization processing, and water treatment. DEIR at 3-37. The combination of morning and nighttime industrial activities and low background/ambient noise levels represent a significant risk for Project-related noise to impact the community, annoy residents, and cause sleep disturbance. The revised DEIR must evaluate these impacts and identify and implement appropriate mitigation.

Grp 21-42

Grp 21-43

The DEIR also fails to take into account the absolute increase in noise levels compared to ambient background conditions. As the Salter Report explains, certain operations could be 25-35 dB above background ambient noise levels. These noise levels would be perceived as more than four times as loud as the median ambient noise levels and would be expected to result in an aggressive community response and complaints. Yet here too, the DEIR incorrectly determines such impacts would be less than significant because overall noise from these operations would not exceed the County's standards. Exhibit B (Salter Report) at 4. The revised DEIR must evaluate both the increase in noise level and the absolute noise level associated with the Project.

2. The DEIR Fails to Disclose the Geographic Extent of the Project's Noise and Vibration Impacts.

Grp 21-44

The DEIR defines the Project as consisting of two separate project sites; the Centennial and Brunswick Sites totaling 175 acres. DEIR at 4.9-1. The DEIR identifies the noise and vibration measurement locations occurring solely at the Centennial Site, the Brunswick Site and along the proposed pipeline location between the two sites. *See* DEIR Figure 4.10-3 (p. 4.10-6).

It appears the DEIR is artificially restricting the geographic size of the study area. While processing would occur on the Centennial and Brunswick sites (175-acres), mine development (tunneling) and gold mineralization production (tunneling and production blasting) would occur throughout the Applicant's 2,585 acre mineral rights boundary owned by the Applicant. DEIR at 3-19, 4.9-1; *see also* Figure 3-2 (p. 3-4). Tunneling and production blasting could certainly result in excessive noise levels and vibration. Despite this fact, the DEIR provides no evidence that noise and vibration impacts were measured throughout the entire mineral rights boundary. As discussed above, an EIR must analyze environmental impacts over the entire area where one might reasonably expect these impacts to occur. *Kings County Farm Bureau*, 221 Cal.App.3d at 721-23. Contrary to this requirement, the DEIR fails to provide the required evidentiary support that the DEIR accurately accounts for the full extent of the Project's noise impacts. The revised DEIR must disclose the Project's potential for noise and vibration impacts throughout the entire mineral rights boundary.

3. The DEIR Fails to Adequately Distinguish the Project's Construction from Its Operational Activities and thus Potentially Fails to Recognize that Certain Impacts Could Be Significant Under CEQA.

Grp 21-45

The DEIR's analysis of construction-related noise raises more questions than it answers. As an initial matter, the DEIR fails to clearly distinguish the Project's construction-related noise sources from its operational noise sources. This distinction is critical because the DEIR asserts that the County's noise standards do not apply to construction-related activities. *See* DEIR at 4.10-16; *see also* Table 4.10-11 (p. 4.10-29, fn. 2) "[b]cause the Nevada County Zoning Ordinance exempts construction activities from the noise standards, these criteria are not applicable to this component of the project. Results of this analysis are provided to give an

indication as to whether or not construction noise increases would be substantial relative to existing ambient conditions at these nearest receptors." If, as appears evident, the DEIR characterizes an operational activity as a construction project it may have incorrectly determined such impacts to be exempt from the County's noise standards and also determined the impact to be less-than-significant under CEQA. For example, the DEIR states that mine development (tunneling) would be constructed throughout the life of the mine. DEIR at 3-19. This would require drilling and the use of explosives. DEIR at 3-19. Similarly, a new mine shaft would be developed on the Brunswick Site. DEIR at 3-22. These massive project components appear to be characterized as construction activities. Yet, they have the potential to be extraordinarily noisy as they would require extensive drilling and rock excavation. *Id.* If the DEIR characterizes these and other project components as construction rather than operation, it inappropriately assumes the noise from these sources would be exempt from the County's noise standards.

Grp 21-46

The first step in remedying this deficiency is to clearly categorize each Project component as either construction-related or operation-related. For each construction-related Project component, the DEIR must disclose fundamental details such as the construction-phasing plan, including the timing and duration of each and every project. This analysis must also disclose each construction-project that is expected to occur over the Project's 80-year timeframe. Finally, in order for the public and decisionmakers to verify whether the DEIR actually accounts for the increase in noise and vibration levels for each construction-related component, the DEIR must identify the location (i.e., page number) in the DEIR and/or its technical appendices depicting the results of the specific noise calculations.

Grp 21-47

Second, although the DEIR acknowledges that the Project's construction activities at the Centennial Site and Brunswick Site could result in substantial temporary increases in noise exposure at eight receptors, it incorrectly concludes that these substantial increases in noise would not result in a significant impact under CEQA. DEIR at 4.10-29, 4.10-30. As discussed above, in evaluating a project's impacts under CEQA, an agency must address the actual impacts of a project and cannot hide behind metrics obscuring evidence of those impacts. *Protect Amador Waterways*, 116 Cal.App.4th at 1110-11 (finding that narrowly designed significance standards improperly foreclose complete consideration of a project's impacts). Here, the Project would result in a substantial increase in noise levels; that these impacts may be exempt from regulation under the County's noise ordinance does not make these impacts insignificant. If anything, the County's failure to regulate these noise impacts reinforces the need to identify them as significant and adopt adequate mitigation, as required by CEQA. The revised DEIR must identify this increase as a significant impact and identify feasible mitigation measures and/or project alternatives to reduce this impact.

4. The DEIR Fails to Identify the Timing of Tunneling and Blasting Operations and Therefore Likely Underestimates the Project's Noise and Vibration Impacts.

The DEIR identifies mine development (tunneling) and gold mineralization production (tunneling and production blasting) as part of the Project, but it does not identify the hours of operation for these Project components. *See* DEIR at 3-19; Figure 3-2 (p. 3-4); Table 3-7 (p. 3-37). The DEIR states that underground exploration and mining would occur 24 hours per day, 7 days per week. DEIR at 3-37. Assuming that underground exploration and mining include mine development and gold mineralization production, tunneling and blasting could occur at night. If this is the case, the Project's noise and vibration impacts would be far more severe than the DEIR discloses.

Grp 21-48

To the extent the County intends to rely on assumptions in the DEIR's technical appendix to suggest that tunneling and blasting would only occur during the day time, it cannot. The DEIR's Appendix M (Blasting Report) states, "[t]herefore, it is assumed that on average 7 drifts round blasts will be required per day. Blasting of drift rounds is normally done between shifts and therefore, on average, 3 to 4 drifts rounds would be blasted every 12 hours between shift changes." Appendix M at 15. The DEIR indicates that the 12 hour shifts will change at 7:00 a.m. and 7:00 p.m. DEIR at 3-36. Yet, the data included in Appendix M are simply modeling assumptions. Without explicit restrictions in the DEIR's project description pertaining to the hours of tunneling and blasting, coupled with conditions of approval, the DEIR cannot simply assume that tunneling and blasting operations would not occur at night and would not adversely impact nearby receptors. The revised DEIR must clearly identify the hours of mine development and gold mineralization production. If these operations occur at night or early in the morning, the revised DEIR must evaluate the potential for noise and vibration to cause sleep disturbance.

5. The DEIR Omits an Analysis of the Noise Impacts Resulting from Remediation of the Centennial Site.

The majority of the Centennial Site cannot be developed because of unstable soils and/or contamination. DEIR at 4.9-1, 4.7-3. As discussed above, DTSC's remediation project calls for engineered fill to be transported by truck from the Brunswick Site and placed on the Centennial Site. DEIR at 2-2. As we have explained, the DEIR assumes the baseline condition at the Centennial Site is post-remediation. DEIR at 1-6. However, the DEIR also acknowledges the possibility that clean up on the Centennial Site would not be complete upon commencement of mining, in which case engineered fill would be placed at the Brunswick Site or transported offsite to be utilized in local and regional construction markets. *See e.g.*, DEIR at 4.7-37.

Grp 21-49

According to the DTSC MND for the Centennial M1 Property Clean-Up Project Remedial Action Plan, activities involved with site remediation will include site clearing, excavation, grading, material transport, and compaction. Exhibit G (MND) at 64. Although

remediation of the Centennial Site could occur during commencement of mining, the DEIR does not analyze noise from remediation-related operations or the truck trips that would occur from these remediation activities.

6. The DEIR Substantially Underestimates Operational Noise Impacts.

The DEIR's analysis of the Project's operational noise and vibration impacts fails to comply because it substantially underestimates the Project's impacts. As a result, the DEIR avoids disclosing significant impacts and avoids having to identify feasible mitigation measures. Examples of the most egregious errors are set forth below.

(a) The DEIR Fails to Adequately Analyze Noise Impacts from the Placement and Compaction of "Engineered Fill" Operations.

Grp 21-50

Placement and compaction of "engineered fill" operations are expected to occur for at least five to six years at the Brunswick and Centennial sites. These operations would require the use of bulldozers, graders, excavators, front-end loaders and compactors. The DEIR relies on a computer noise model to estimate noise levels at nearby sensitive receptors and concludes that noise from "engineered fill" activities would not exceed the County noise standards at any receptor location. DEIR Table 4.10-14 (p. 4.10-33). However, a peer review of the DEIR's analysis conducted by Salter determined that the DEIR substantially underestimates the level of noise the surrounding community would experience. In fact, many of the calculated noise levels exceed the DEIR's estimates by up to 14 dB. Exhibit B (Salter Report) at 3, 4. By underestimating the actual noise levels that would be generated by the Project's operations, the DEIR avoids identifying significant impacts at 11 receptor locations near the Brunswick Site. *Id.*

Grp 21-51

Salter determined that the DEIR further underestimates the DEIR's noise impacts because it compares Project-related noise to ambient conditions near roadways. When noise monitoring devices are placed near roadways, they detect intermittent noise associated with passing cars and trucks. Yet, the median and "background" ambient noise levels indicate that much of the time people experience notably lower noise levels. Exhibit B (Salter Report) at 4. As discussed above, had the DEIR evaluated the absolute increase in projected noise levels against accurate ambient conditions, the DEIR would have determined that noise levels with the Project could increase by 20 to 35 db. As the DEIR reveals, a 5.0 dB increase in noise level is considered a significant impact.[5] *See* DEIR at Table 4.10-5 (p. 4.10-17). In addition to comparing the

[5] Inexplicably, the DEIR relies on varying thresholds for the Project's traffic and on-site noise sources. The DEIR relies on a numerical increase in noise only to determine the significance of the Project's traffic noise impacts. *See* DEIR Table 4.10-5 (p. 4.10-17), identifying +5.0 dB or more as constituting a significant traffic noise impact. For on-site noise sources, it relies on the noise limits included in the Nevada County General Plan Noise Element and the Nevada County Land Use and Development Code. DEIR Table 4.10-4 (p. 4.10-12); 4.10-15.

Project's noise levels to the County's standards, it should have evaluated the Project's impacts against ambient noise, i.e., the noise levels that people actually experience. Exhibit B (Salter Report) at 4. The revised DEIR must provide this analysis.

(b) The DEIR Relies on Flawed Assumptions Regarding Equipment "Upgrades" to Conclude the Project Would Not Exceed the County's Noise Standards.

Grp 21-52

The DEIR assumes the implementation of various "upgrades" to mechanical equipment in its calculation of projected noise levels but it fails to include any enforceable commitment to actually implement these upgrades. The DEIR concludes that with implementation of these upgraded measures, operational noise would be below County standards and the Project's impacts would be less than significant. DEIR at 4.10-41. For example, as Salter explains, the DEIR assumes the Project's metal buildings would achieve the highest possible sound insulation system and the project's ventilation fan(s) would employ high performance industrial fan silencers. Exhibit B (Salter Report) at 5-6. Yet, we can find no evidence in the DEIR or the technical appendices that the Applicant has committed to installing this equipment. Similarly, the DEIR appears to rely on specific assumptions regarding backup generators, including engine exhaust mufflers, sound isolating building construction, and radiator fan silencers, but again, the document does not identify the specific type of equipment. Nor does it identify the expected noise-attenuation of each piece of equipment. *Id.* By assuming that these "upgrades" are already incorporated into the Project when conducting the noise analysis, the DEIR obscures the true extent of the Project's noise impacts. As Salter explains, "the DEIR appears to 'promise' a less-than-significant noise impact, but omits the controls, assurances, and appropriate mitigation to ensure that this claim is actually achieved. Without requiring the aforementioned noise reducing measures, or assumed 'upgrades,' the DEIR fails to adequately protect the community from the potential for excessive noise." *Id.* The revised DEIR must evaluate the significance of the Project's noise impacts without these upgrades. *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 655-57.

(c) The DEIR Fails to Adequately Analyze or Mitigate the Noise and Vibration Impacts from the Project's Blasting Operations.

Grp 21-53

The DEIR relies on an overly lenient threshold of significance to assert that vibration from the Project's blasting operations would be barely perceptible to nearby receptors. Exhibit B (Salter Report) at 7-8. The DEIR identifies a 0.4 in/sec peak particle velocity (PPV) vibration limit based primarily on a vibration study performed following an underground nuclear blast in Mississippi in 1964. Exhibit B (Salter Report) at 8; DEIR at 4.10-58. Salter explains that human responses to a single blast does not reflect the impact on the community from ongoing, perceptible and potentially unpleasant vibration over the 80-year lifespan of this Project. Exhibit B (Salter Report) at 7-8. Nevertheless, the DEIR references this study as it is described in a U.S. Bureau of Mines (USBM) 1971 document entitled "Blasting Vibrations and Their Effects on

Structures." *Id.* The claim extracted from the USBM document is that "less than 8% of people would complain about blasting activities if the peak particle velocity (PPV) was below 0.4 in/sec." DEIR, Appendix M, at 7. However, as Salter explains, the original chart this is drawn from provides additional context: The proposed limit of 0.4 in/sec. PPV is characterized as clearly perceptible and borderline unpleasant. Exhibit B (Salter Report) at 8. A Caltrans Manual confirms that blasting vibration of 0.4 in/sec would be considered "strongly perceptible." *Id.*

Salter explains that a 0.4 in/sec vibration limit might be appropriate in certain scenarios, such as for a short-term event. However, this Project involves ongoing mining operations for 80 years. According to Salter, this impact would be far more severe when blasting operations occur at night, especially because the DEIR does not include any restrictions on nighttime operations. Exhibit B (Salter Report) at 9. In this regard, the DEIR ignores crucial guidance set forth by the U.S. Office of Surface Mining and Reclamation and Enforcement (OSMRE):

> All blasting must take place during daylight hours unless more restrictive times are specified. If night-time blasting is approved by the regulatory authority, it must be based on evidence from the operator that the public will be protected from adverse noise and other impacts.

Exhibit B (Salter Report) at 9 (citing OSMRE Blasting Guidance Manual).

The DEIR provides no evidence that the public will be protected from adverse effects from the Project's blasting operations. It provides no special consideration and therefore no additional restrictions on blasting vibration during evening and nighttime hours. According to Salter, subjecting residents to "strongly perceptible" and borderline "unpleasant" vibration for the rest of their lives constitutes a significant impact. Exhibit B (Salter Report) at 9. Because the DEIR fails to disclose this impact, it must be revised and recirculated.

Grp 21-54

The DEIR errs further in its evaluation of noise from the Project's blasting operations. To evaluate the Project's blasting-related noise impacts, the DEIR relies on noise measurements conducted at the Sutter Gold underground mine in Amador County. DEIR at 4.10-44. The Sutter Gold study found blasting noise to be 75 dBA, on average, at a distance of 200 feet from the mine portal. *Id.* However, to translate those findings to the Project's Brunswick Site, the DEIR assumes that noise at the Project site would be reduced by 20 dB compared to the Sutter Gold mine. *Id.* Other than mentioning the difference in orientation and size of the portal, this claim of 20 dB noise reduction is unsubstantiated. As the Salter Report explains, twenty decibels of noise reduction is a substantial change in noise emission. *Id.* Without further data or evidence to back up this 20 dB claim, the DEIR cannot simply assume these lower noise levels.

According to Salter, without the unsubstantiated 20 dB of reduction, blasting noise at the nearest sensitive receptors would be between 72 and 77 dBA. Exhibit B (Salter Report) at 10. As stated above and in the DEIR, ambient median and "background" noise levels at many sensitive receptors is between 35 dBA and 50 dBA. Thus, the blasting noise could be substantially above the ambient noise levels, by approximately 25 to 40 dB. Salter determines such an event to be considered a disturbance, likely resulting in complaints, particularly at night when sleep disturbance would be expected. *Id.* This is a significant undisclosed impact requiring that the DEIR be revised and recirculated.

C. The DEIR Fails to Adequately Analyze and Mitigate the Project's Impacts Relating to Hazards and Hazardous Materials.

1. The DEIR Omits an Accurate Description of Existing Conditions.

For the reasons discussed above, an accurate depiction of the existing environmental setting is critical to a complete assessment of the Project's impacts. Yet here too, the DEIR fails to provide an adequate description of the hazardous conditions on the Project's Centennial Site.

Grp 21-55

The existing waste rock and mine tailings that were generated from historic mining activities contain contaminants at levels exceeding regulatory thresholds, including California hazardous waste thresholds. Exhibit A (Baseline Report) at 2. These existing waste rock and mine tailings at the Centennial Site have been present (and have represented a persistent environmental hazard) since the former mining operation at the site shut down over 60 years ago (circa 1956). As discussed above, the owner of the Centennial Site entered into a Voluntary Cleanup Agreement with the DTSC to address the hazards associated with the legacy waste rock and mine tailings generated from previous mining operations. It should be noted that cleanup actions were not initiated by the site owner until they were ready to reopen the mine. It is also important to note that under existing conditions, the majority of the Centennial Site cannot be developed due to unstable soils and/or contamination. DEIR at 4.7-3.

Despite these circumstances, the DEIR assumes as baseline conditions that the Centennial Site will be cleaned up pursuant to the Voluntary Clean Up Agreement with DTSC. *See* DEIR at 4.7-3, 4.7-4, "this EIR does not use the existing condition at the site for the environmental baseline and instead uses an environmental baseline that reflects the anticipated conditions for the Centennial Industrial Site following implementation of the [Remedial Action Plan];" and 4.7-32, "the baseline condition for the Centennial Industrial Site has been adjusted for this analysis to reflect post-remediation condition."

The problem with this approach is that the DEIR does not provide the necessary assurance that this cleanup will occur prior to implementation of other Project components. In several instances, the DEIR acknowledges that clean up on the Centennial Site may not be complete upon commencement of mining and that it may not even be completed within the 80-

year permit life. *See* DEIR at 3-26, "[i]t is the applicant's *intent* to prioritize the placement of the engineered fill at the Centennial Industrial site" (emphasis added); *see also* DEIR at 3-26, "Notwithstanding the priority of placing engineered fill at the Centennial Site, the ultimate approach to engineered fill placement will need to remain flexible to address any potential unforeseen circumstances. One such scenario would be if the remediation of the Centennial Site, currently under DTSC oversight, is not complete upon commencement of mining, in which case engineered fill would be placed at the Brunswick Industrial Site and/or transported off-site to be utilized in local and regional construction markets."

Absent full disclosure of existing, baseline hazardous conditions on the Project site, it is impossible for decisionmakers or the public to fully evaluate the hazardous impacts associated with the Project.

2. The DEIR Fails to Analyze or Mitigate Hazardous Impacts Relating to Waste Rock and Mine Tailings.

The DEIR fails to evaluate how future waste rock and mine tailings generated by the proposed Project would be managed to ensure that they do not pose a health hazard to people or the environment. The DEIR provides almost no information that demonstrates the chemical quality of the rock proposed to be mined would differ in any way from the rock that was mined historically. According to the Baseline Report, in the absence of this information, it is reasonable to assume that any newly generated waste rock and mine tailings would have similar chemical characteristics as the rock mined in the past. Therefore, the waste rock and mine tailings generated by the proposed Project will almost certainly contain asbestos, silica, and trace heavy metal toxic air contaminants (TACs) including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium that could pose a health risk to people and the environment. DEIR at 4.3-79; Exhibit A (Baseline Report) at 3.

Grp 21-56

As mentioned above, the DEIR tries to "rebrand" the waste rock and mine tailings as "engineered fill," apparently in the hopes that the waste material can be transported off-site for use at various unspecified construction sites throughout the region as fill material. Although this material would almost certainly result in numerous new contaminated wastes sites that pose a threat to the public and the environment, the DEIR fails to provide *any* analyses of these impacts.

The DEIR suggests that any impacts would be mitigated because the Applicant will comply with RWQCB requirements. Yet, for the reasons discussed in this letter, it is not sufficient to rely on regulatory permitting to assert that impacts will be mitigated. The DEIR must first comprehensively analyze these impacts and then demonstrate how regulatory compliance will ensure impacts are sufficiently mitigated. This analysis must take into account the fact that similar historic actions have been demonstrated to result in environmental harm that has persisted for decades.

3. The DEIR Fails to Evaluate or Mitigate Flight Hazards at Nevada County Air Park.

Grp 21-57

The closest public use airport to the Project site is the Nevada County Air Park, less than one-mile (approximately 4,000 feet) northeast of the Brunswick Site. DEIR at 4.7-36. When the weather is cool, the Project will cause saturated air to become super-saturated and create a continuous plume cloud. *See* Report prepared by CEA Foundation, submitted under separate cover. A southwest breeze will move this plume towards the airport and potentially obstruct the airspace surrounding the airport. *Id.* This large volume of heated air will updraft, possibly causing turbulence for air traffic. It could also develop into a standing cloud or fog that will impede visibility for aircraft and/or the tower and thus pose a hazard to flight. *Id.* Because the DEIR neither discloses, analyzes or mitigates this impact, it must be revised and recirculated.

4. The DEIR Fails to Adequately Analyze the Project's Cumulative Impacts Relating to Hazards and Hazardous Materials.

Grp 21-58

The DEIR fails to analyze cumulative hazards to the public and environment related to increases in the transport, storage, and use of hazardous materials. The DEIR suggests there would be no cumulative impacts because no other cumulative projects are anticipated to haul hazardous materials along Brunswick Road on an ongoing basis. DEIR at 4.7-39. This is incorrect. As discussed above, DTSC's RAP would require transporting by truck "engineered fill" from the Brunswick Site to the Centennial Site. DEIR at 2-2; Exhibit G (MND). The MND clearly acknowledges that implementation of the RAP may temporarily increase the risk of exposure of soil contaminants to the public. Exhibit G (MND) at 50. Consequently, the DEIR should have analyzed how the transport, storage and use of hazardous materials from the proposed Project together with the RAP would affect public health and safety. To the extent that the DEIR preparers might suggest that the cleanup of the Centennial Site would occur prior to the proposed Project, it cannot do so. Again, as discussed above, according to the DEIR, the possibility exists that clean up on the Centennial Site would not be complete upon commencement of mining. DEIR at 4.7-37. It also acknowledges the possibility that clean up on the Centennial Site would not be completed within the 80-year permit life of the proposed mine Project, and that "engineered fill" would be placed at the Brunswick Site and/or transported off-site to be utilized in local and regional construction markets. *Id.* The revised DEIR must analyze the cumulative effects of the RAP along with the proposed Project.

D. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.

Grp 21-59

The DEIR's analysis of air quality contains numerous flaws. First, the DEIR fails to analyze the Centennial Site's cleanup's impact on air quality, or the air quality impacts that may result from the Project if the Centennial cleanup does not occur. Second, the DEIR's analysis of air quality impacts from Project construction assumes a construction timeline that contradicts the

Project description. Third, the DEIR improperly relies on assumed mitigation measures for air quality impacts, failing to acknowledge those measures as mitigation. Fourth, the DEIR fails to mitigate significant air quality impacts from operational emissions of criteria air pollutants. Finally, the DEIR's Health Risk Assessment fails to disclose essential information and lacks substantial evidence to support its conclusions. The DEIR must be revised to correct these flaws.

1. The DEIR Fails to Analyze the Centennial RAP's Impact on Air Quality.

The Centennial RAP is an integral part of the IMM Project, as discussed in Section I.C, *supra*. Remediation of the Centennial Site is a necessary prerequisite to the dumping of mine waste from the Project on that site, and the Project's eventual reclamation of the site. *Id.* As explained above, the DEIR must therefore include the Centennial RAP as part of the Project, and must analyze all of the environmental impacts resulting from the RAP, including air quality impacts.

Grp 21-60

The Centennial RAP would involve mixing soil with over 335 tons (22 truckloads) of cement to stabilize the contaminants in that soil. Exhibit G (MND) at 3. It would require the clearing of existing vegetation, the excavation and grading of 36.7 acres of land on the Centennial Site, and the movement of 129,100 cubic yards of soil using backhoes and other heavy equipment. *Id.* at 3-4; Exhibit E (RAP) at 44. The MND for the Centennial RAP finds that the cleanup would generate potentially significant criteria air pollutant emissions that require mitigation. Exhibit G (MND) at 24-25. The DEIR improperly fails to disclose or analyze the impacts of these cleanup activities on air quality. DEIR at 4.3-66 to 4.3-102. The DEIR's omission of these impacts violates CEQA. *See County of Inyo*, 172 Cal.App.3d at 165-66; *Nelson*, 190 Cal.App.4th at 271. By failing to include this essential information, the DEIR prevents informed analysis of the Project's impacts and is therefore legally inadequate.

2. The DEIR Fails to Analyze Air Quality Impacts that May Result from the IMM Project if the Centennial Cleanup Does *Not* Occur.

The DEIR also fails evaluate air quality impacts that may result from the Project if the Centennial cleanup does not occur. The DEIR acknowledges that the Centennial Site might never be remediated during the 80-year term of the mine permit. DEIR at 1-3, 3-26. If that occurs, the Centennial Site will never become available for dumping of mine waste, and an additional 1.6 million tons of mine waste from the Project will need to be trucked offsite once the dumping area at the Brunswick Site is full. *Id.* at 1-3, 3-32 to 3-33, 3-26. The DEIR must evaluate the potential impacts of the offsite trucking of those additional 1.6 million tons of mine waste on air quality. The DEIR lacks this analysis. Instead, the DEIR's air quality analysis simply assumes that the Centennial RAP will be completed and that dumping of fill at the Centennial site will occur in the first five years of Project operations. *See id.* at 4.3-50, 4.3-53 to 4.3-54, 4.3-67 to 4.3-68, 4.3-93.

Grp 21-61

Because there is no assurance that remediation of the Centennial Site will be completed within the lifetime of the Project, it's speculative to assume that the site will be available for fill placement. *See* Exhibit A (Baseline Report) at 12-13. If the Centennial RAP is never completed and no fill is ever placed at the Centennial Site, that fill must be trucked offsite for an additional five years, resulting in additional air pollutant emissions not disclosed in the DEIR. The document's failure to disclose or analyze this impact deprives the public and decision-makers of essential information in violation of CEQA. *See Banning Ranch*, 2 Cal.5th at 941-42. The DEIR's analysis for criteria air pollutants should be revised to assume that remediation of the Centennial Site may not be completed within the lifetime of the Project, and must evaluate the resulting air quality impacts of additional off-site trucking. *See* Exhibit A (Baseline Report) at 13. As demonstrated in Baseline's analysis of daily NO_x emissions, these additional off-site truck trips would result in more severe air quality impacts than those disclosed in the DEIR. *Id.*

5. The DEIR's Analysis of Construction Emissions Contradicts the Project Description.

Grp 21-62

The DEIR's analysis of air quality impacts from Project construction is unsupported because it contradicts the Project description regarding the duration of construction. The Project description states that construction would last for 18 months. DEIR at 3-37. By contrast, the DEIR's air quality analysis assumes that Project construction would last for only 12 months, and bases its impact evaluation on that assumption. *Id.* at 4.3-44 to 4.3-46, 4.3-66 to 4.3-67, 4.3-74. The DEIR is therefore internally contradictory. "[S]uch an unexplained discrepancy precludes the existence of substantial evidence" for the EIR's conclusions. *Preserve Wild Santee*, 210 Cal.App.4th at 284. The DEIR asserts that "the construction scenario assessed herein is the worst-case, because if the same construction activities were to be spread over a longer period (i.e., a period in excess of 12 months), the amount of overlap of equipment usage would be reduced, which would result in reduced max daily and annual emissions." DEIR at 4.3-44. However, the DEIR fails to provide any evidence in support of this statement, which fails to account for the fact that a longer construction period would result in a longer period of construction-related air pollution exposure for nearby receptors. The DEIR's air quality analysis must be revised to assume the same construction duration as the Project description.

3. The DEIR Improperly Relies on Assumed Air Quality Mitigation Measures, Preventing Informed Impact Analysis.

Grp 21-63

The DEIR lists three "applicant-proposed emissions reduction measures" intended to reduce the Project's air quality impacts. DEIR at 4.3-65. However, the DEIR does not classify these measures as mitigation, explaining that "[t]he analysis presented within this chapter *assumes* that all of the applicant proposed measures (APMs) presented below would be implemented." *Id.* (emphasis added). The DEIR assumes the APMs will be incorporated into the Project, but the APMs were not identified as Project features in the Project description, and there

is no assurance that these measures will be implemented as a part of the Project. *See* Exhibit A (Baseline Report) at 14. These applicant-proposed measures are in reality mitigation measures, which the DEIR improperly fails to recognize as such. This approach violates CEQA. In evaluating a project's impacts, an agency may not "compress[] the analysis of impacts and mitigation measures into a single issue" by incorporating an assumed mitigation measure into a project's features. *Lotus*, 223 Cal.App.4th at 656. A project's significant impacts must be determined first, and then the CEQA document must identify enforceable mitigation that will address those impacts. *Id.* at 656, 658.

Grp 21-64

Here, applicant-proposed measure APM-AQ-1 (Exhaust Emission Controls) requires that "[a]ll off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines." DEIR at 4.3-65. It also requires that "[u]nnecessary construction vehicle idling time shall be minimized" and that "[a]ll off-road equipment shall be maintained in accordance with manufacturer's specifications." *Id.* APM-AQ-2 (Surface Fugitive Dust Controls) calls for wetting or covering of "all exposed soil surfaces (e.g., unpaved disturbed areas, unpaved parking areas, and unpaved staging areas, and soil piles)" to prevent fugitive dust emissions during construction and operations, and calls for construction techniques to minimize dust from roadways. DEIR at 4.3-65. APM-AQ-3 calls for the Applicant to implement an "ASUR Plan, which incorporates measures designed to minimize asbestos in engineered fill produced by the project, as well as minimize the emission of asbestos-containing dust from the underground mine." *Id.*

Each of these three measures are de facto mitigation measures, as they are clearly intended to minimize the Project's air quality impacts by reducing emissions sources. *See* CEQA Guidelines §15370 (defining "mitigation"); DEIR at 4.3-81 (asserting that APM-AQ-2 would reduce the fugitive dust generated by the Project); 4.3-82 (finding that APMs would reduce Project emissions of criteria pollutants); 4.3-87 (noting that APM-AQ-1 would reduce air pollution). However, the DEIR's calculation of "unmitigated" emissions of criteria air pollutants expressly assumes that APM-AQ-1 and APM-AQ-2 have already been implemented. DEIR Table 4.3-17 (p. 4.3-70); 4.3-73. The DEIR makes no attempt to calculate what the Project's emissions would be without the APMs, and does not separately quantify the emission reductions that would result from these measures. By assuming that these measures are already incorporated into the Project when conducting its air quality analysis, the DEIR obscures the true extent of the Project's air quality impacts. The DEIR must be revised to classify the APMs as mitigation measures, and must evaluate their effectiveness in reducing air quality impacts. The DEIR must evaluate the significance of the Project's air quality impacts without these mitigation measures, *before* considering the effectiveness of mitigation and the significance of Project impacts after mitigation. *Lotus*, 223 Cal.App.4th at 656, 658; *see* Exhibit A (Baseline Report) at 14. Only then can decisionmakers and the public fully understand the Project's impacts.

4. The DEIR Fails to Mitigate Significant Air Quality Impacts from Operational Emissions of ROG, NO_X And PM_{10}.

The DEIR concludes that the Project would not conflict with or obstruct implementation of an applicable air quality plan, and that this impact would be less than significant after mitigation. DEIR at 4.3-66. However, the DEIR's proposed mitigation fails to account for the Project's operational emissions of criteria air pollutants. The DEIR concludes that daily operational emissions of ROG, NO_X and PM_{10} are significant under Northern Sierra Air Quality Management District (NSAQMD) significance criteria and require mitigation. *Id.* at 4.3-67 to 4.3-70, 4.3-73; *see* Exhibit A (Baseline Report) at 14. It finds that without mitigation, these significant operational emissions could conflict with or obstruct implementation of the NSAQMD's Ozone Attainment Plan. DEIR at 4.3-70; *see id.* at 4.3-66.

Grp 21-65

Despite finding that operational emissions of ROG, NO_X, and PM_{10} require mitigation, the DEIR does not propose any mitigation measures to address operational emissions of those pollutants. *Id.* at 4.3-77 to 78. The DEIR includes two mitigation measures (Mitigation Measures 4.3-1(a) and 4.3-1(b)) which exclusively address *construction* emissions. *Id.* at 4.3-77 to 78. As written, nothing in Mitigation Measures 4.3-1(a) and 4.3-1(b) would do anything to reduce the Project's operational emissions. *See* Exhibit A (Baseline Report) at 14. Mitigation Measure 4.3-1(a) states that it contains measures "for use during construction," including the use of grid power where feasible "during construction" and temporary traffic control "during all phases of the construction." DEIR at 4.3-77. Mitigation Measure 4.3-1(b) calls for a "Construction Exhaust Emissions Minimization Plan" which applies to equipment used during construction. *Id.* at 4.3-77 to 4.3-78.

Inexplicably, however, the DEIR claims that *operational* emissions of ROG, NO_X, and PM_{10} would be mitigated to a less than significant level after implementation of these purely construction-related mitigation measures. *Id.* at 4.3-75 to 4.3-76 (Table 4.3-19, showing "mitigated" operational emissions levels for those pollutants as not significant). The DEIR does not provide any evidence as to how operational emissions of ROG, NO_X, and PM_{10} —which it acknowledges are significant before mitigation—could be reduced to a less than significant level when the DEIR does not include any mitigation measures for those operational impacts. *See* Exhibit A (Baseline Report) at 14. "[S]uch an unexplained discrepancy precludes the existence of substantial evidence" for the EIR's conclusions. *Preserve Wild Santee*, 210 Cal.App.4th at 284. Courts will not defer to an agency's conclusions about the effectiveness of a mitigation measure where, as here, the measure's efficacy in reducing an impact is not apparent and there is no evidence in the record showing that it will be effective. *King & Gardiner Farms*, 45 Cal.App.5th at 866, 875-76.

This unexplained discrepancy between the DEIR's significance conclusion for pre- and post-mitigation operational emissions of ROG, NO_X, and PM_{10} and the lack of operational

mitigation measures cannot be attributed to any impact of the applicant-proposed measures for emissions reduction identified in the DEIR. *See* DEIR at 4.3-65. In fact, the DEIR expressly notes that its calculations of "unmitigated" emissions of these criteria pollutants already reflect reductions from the assumed applicant-proposed measures discussed above in Section II.D.4, which the DEIR does not classify as mitigation. *Id.* at 4.3-73 ("The emission data presented in Table 4.3-17 (i.e., unmitigated emissions) reflect the reductions that would occur with implementation of APM-AQ-1 and APM-AQ-2."). The DEIR must be revised to fully explain the basis for its conclusion that operational emissions of ROG, NO_X, and PM_{10} would be mitigated to a level below significance, and then recirculated.

6. The DEIR's Health Risk Assessment Fails to Disclose Essential Information and Lacks Substantial Evidence to Support Its Conclusions.

The DEIR indicates that the Project would generate toxic air contaminants that could pose health risks to people in the vicinity of the Project site. DEIR at 4.3-79. However, the DEIR fails to provide sufficient information to enable informed analysis of these health impacts, and therefore lacks substantial evidence for its conclusion that these impacts would be less than significant after mitigation. *See* Exhibit A (Baseline Report) at 17-18.

Grp 21-66

The DEIR states that Project construction and operations would produce diesel particulate matter (DPM) emissions from off-road equipment, haul truck trips, and generators, while mining activities such as blasting and crushing, ore processing, and soil movement would generate emissions of asbestos, silica, and trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. DEIR at 4.3-79. The DEIR includes a health risk assessment (HRA) for nearby sensitive receptors exposed to concentrations of TACs generated by the Project. *Id.* at 4.3-79 to 4.3-80; *see* DEIR Appendix E.1 (Air Quality and GHG Technical Report); Appendix B (Health Risk Assessment) at 26-27. The HRA analyzes air dispersion of 25 sources of TAC emissions during construction and operation of the Project. *See* HRA at 8-12. Based on the air dispersion model results, the HRA estimated the health risks for a sensitive receptor exposed to 33 different TACs. *Id.* at 25.

The DEIR concludes that before mitigation, the Project's effect on increased cancer risk for the "Maximally Exposed Individual Resident" would be 10.4 persons per million, exceeding the applicable NSAQMD significance threshold of 10 persons per million, resulting in a significant impact. DEIR at 4.3-80. However, with implementation of Mitigation Measure 4.3-1(b), which requires Tier 4 engines during construction, the DEIR concludes that the Project would result in an incremental cancer risk of 7.6 persons million. *Id.* at 4.3-80. The DEIR's asserted 27 percent reduction in cancer risk is surprising, because Mitigation Measure 4.3-1(b)

only reduces emissions during the one-year Project construction period,[6] and does not reduce any emissions over the remaining 80 years of Project operations. *Id.* at 4.3-77 to 4.3-78. The DEIR finds that after mitigation, the Project's impacts on increased cancer risk and other health risks would be less than significant. *Id.* at 4.3-79, 4.3-80, 4.3-82. This conclusion is not adequately supported, because the DEIR fails to provide essential information about how health risks were calculated, making it impossible to evaluate the effectiveness of Mitigation Measure 4.3-1(b).

Grp 21-67

The DEIR fails to adequately disclose or document the results of the HRA for the numerous sources of TAC emissions associated with the Project. *See* Exhibit A (Baseline Report) at 17-18. The DEIR only presents the total cancer risk, chronic health risk, and acute health risk for a sensitive receptor, despite finding that receptors could be exposed to 33 different TACs from 25 different sources at different times over a 30-year period. DEIR at 4.3-80; *see* HRA at 8-12, 25-27. The individual health-risk contributions from each emission source, TAC, and year of exposure are not documented or summarized anywhere in the DEIR or HRA. In addition, no graphics are provided to show the location of the modeled emission sources, sensitive receptors, and results of the air dispersion modeling. As a result, the DEIR fails to provide sufficient information for the public or decisionmakers to review the findings of the health risk assessment and evaluate the effectiveness of the proposed mitigation measures. *See* Exhibit A (Baseline Report) at 17-18. An EIR must include adequate data to enable the public and decisionmakers to understand a project's impacts and draw informed conclusions. *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442. Here, because the DEIR air quality analysis fails to provide this essential information about its analytical methods, it also lacks substantial evidence to support its conclusions. The DEIR must be revised to properly document the findings of the HRA.

E. The DEIR Fails to Adequately Analyze or Mitigate the Project's GHG Emissions.

Grp 21-68

The DEIR's analysis of GHG emissions suffers from several key deficiencies. First, the DEIR fails to analyze the Centennial Site cleanup's impact on GHG emissions, or the emissions that may result from the IMM Project if the Centennial cleanup does not occur. Second, the DEIR's analysis of GHG emissions from Project construction assumes a construction timeline that contradicts the Project description. Third, the DEIR improperly relies on assumed mitigation measures for GHG impacts, failing to acknowledge those measures as mitigation. Fourth, the DEIR's significance threshold for operational GHG emissions is unsupported. Finally, the DEIR relies on third-party GHG mitigation offsets which lack adequate performance standards and are improperly deferred.

[6] While the DEIR's air quality analysis assumes that construction would last for one year (DEIR at 4.3-44), the DEIR's project description states that construction would last for 18 months (DEIR at 3-37). The DEIR is therefore internally inconsistent, as discussed above in Section I.D.

1. The DEIR Fails to Analyze the Centennial RAP's Impact on GHG Emissions.

Grp 21-69

As discussed in Sections I.C and II.D.1, *supra*, the DEIR must include the Centennial RAP as part of the Project, and must analyze all of the environmental impacts resulting from the RAP. *Id.* Accordingly, the DEIR must evaluate the GHG emissions that result from the cleanup of the Centennial Site. The Centennial RAP would involve cement mixing, clearing of existing vegetation, excavation and grading of 36.7 acres of land, and the use of backhoes and other heavy equipment. Exhibit G (MND) at 3-4; Exhibit E (RAP) at 44. The MND concludes that the RAP's operation of off-road diesel equipment would generate approximately 1,077.25 metric tons of CO_2 equivalent in GHG emissions. Exhibit G (MND) at 47. The DEIR improperly fails to disclose or analyze the impacts of these RAP activities on GHG emissions. DEIR at 4.3-66 to 4.3-102. The DEIR's omission of these impacts prevents informed analysis and violates CEQA. *See County of Inyo*, 172 Cal.App.3d at 165-66; *Nelson*, 190 Cal.App.4th at 271. The revised DEIR must provide this analysis.

2. The DEIR Fails to Analyze GHG Emissions that May Result from the Project if the Centennial Cleanup Does *Not* Occur.

Grp 21-70

The DEIR also fails to evaluate GHG emissions that would result from the Project if the Centennial Site cleanup does not occur, as discussed in Sections I.B and II.D.2, *supra*. The DEIR acknowledges that the Centennial Site might never be remediated during the 80-year term of the mine permit, which would require trucking an additional 1.6 million tons of mine waste to offsite locations after the Brunswick Site is full. DEIR at 1-3, 3-32 to 3-33, 3-26. The DEIR must evaluate the GHG impacts of that additional offsite trucking, but fails to do so. Instead, the DEIR's GHG analysis simply assumes that the Centennial RAP will be completed and that fill dumping at the Centennial Site will occur in the first five years of Project operations. *See id.* at 4.3-50, 4.3-53 to 4.3-54, 4.3-67 to 4.3-68, 4.3-93. Because there is no assurance that remediation of the Centennial Site will be completed within the lifetime of the Project, it's speculative to assume that the site will be available for fill placement. *See* Exhibit A (Baseline Report) at 12-13. As discussed in Section I.B, *supra*, the DEIR must evaluate Project impacts relative to existing conditions at the Centennial Site, considering the possibility that the RAP may never occur and analyzing the impacts that would result in that scenario.

The DEIR finds that the Project would generate annual operational GHG emissions of 7,221 MT CO_2e in years 2022 to 2026, when it assumes fill would be dumped at the Centennial Site, 6,999 MT CO_2e in years 2027 to 2032, when fill would be dumped at the Brunswick Site, and 9,041 MT CO_2e in years 2033 to 2,102, when fill would be trucked offsite. DEIR at 4.3-93 to 4.3-94. The DEIR indicates that almost all of the variation in annual emissions between these three time periods is attributable to on-road vehicle emissions, which include emissions from trucks carrying mine waste. *Id.* If the Centennial RAP is never completed and no fill is ever

placed at the Centennial Site, that fill must be trucked offsite for an additional five years, resulting in an annual increase of 1,820 MT CO_2e for each of those years. The DEIR does not disclose this important impact. The document's failure to disclose or analyze this impact deprives the public and decision-makers of essential information in violation of CEQA. *See Banning Ranch*, 2 Cal.5th at 941-42. The DEIR's GHG analysis should be revised to assume that remediation of the Centennial Site may not be completed within the lifetime of the Project, and must evaluate the resulting GHG impacts of additional off-site trucking. *See* Exhibit A (Baseline Report) at 13.

3. The DEIR's Analysis of Construction GHG Emissions Contradicts the Project Description.

Grp 21-71

The DEIR's analysis of GHG impacts from Project construction is unsupported because its assumptions regarding the duration of construction contradict the Project description. The DEIR's Project description states that Project construction would last for 18 months. DEIR at 3-37. By contrast, the DEIR's GHG analysis assumes that Project construction would last for only 12 months, and bases its impact evaluation on that assumption. *Id.* at 4.3-44 to 4.3-46, 4.3-92. The DEIR is therefore internally contradictory. "[S]uch an unexplained discrepancy precludes the existence of substantial evidence" for the EIR's conclusions. *Preserve Wild Santee*, 210 Cal.App.4th at 284. The DEIR asserts that "the construction scenario assessed herein is the worst-case, because if the same construction activities were to be spread over a longer period (i.e., a period in excess of 12 months), the amount of overlap of equipment usage would be reduced, which would result in reduced max daily and annual emissions." DEIR at 4.3-44. The DEIR fails to consider whether an 18-month construction period could result in greater total GHG emissions than a 12-month construction period, even if those emissions are spread out over a longer period. The DEIR's GHG analysis must be revised to assume the same construction duration as the Project description.

4. The DEIR Likely Underestimates the Project's GHG Emissions Because it Assumes the Use of Electrically Powered Equipment.

Grp 21-72

The DEIR assumes the implementation of electrically powered equipment for its construction and operations and almost certainly relies on these features in its calculations of the Project's GHG emissions. *See e.g.*, DEIR Tables 4.3-7 and 4.3-10 (pp. 4.3-46 and 4.3-51). Yet, we can find no evidence in the DEIR that this equipment would actually be electrified. Unless the Project includes electrification as a condition of approval, the DEIR cannot take credit for these features in its GHG emissions' inventories. This defect also pertains to the DEIR's air quality and energy analyses.

5. The DEIR Improperly Relies on Assumed GHG Mitigation Measures, Preventing Informed Impact Analysis.

As discussed in Section II.D.4, *supra*, the DEIR lists several "applicant-proposed emissions reduction measures" which it does not classify as mitigation, and simply assumes that those measures would be implemented when conducting impact analysis. DEIR at 4.3-65. The APMs were not identified as Project features in the Project description, and there is no assurance that these measures will be implemented as a part of the Project. *See* Exhibit A (Baseline Report) at 14. These applicant-proposed measures are in reality mitigation measures, which the DEIR improperly fails to recognize as such. As explained above, this approach violates CEQA. *See Lotus*, 223 Cal.App.4th at 656. A project's significant impacts must be determined first, and then the CEQA document must identify enforceable mitigation measures and evaluate the measures' effectiveness in addressing project impacts. *Id.* at 656, 658; *see* Exhibit A (Baseline Report) at 14.

Grp 21-73

This error invalidates the DEIR's analysis of GHG emissions, just as it does for the air quality and energy use analyses. In addition to requiring Tier 4 engines, applicant-proposed measure APM-AQ-1 (Exhaust Emission Controls) requires that "[u]nnecessary construction vehicle idling time shall be minimized" and that "[a]ll off-road equipment shall be maintained in accordance with manufacturer's specifications." DEIR at 4.3-65. APM-AQ-1 thus seeks to reduce the Project's GHG emissions as well as its air quality and energy impacts. *Id.* at 4.3-87 (noting that APM-AQ-1 would reduce GHG emissions). APM-AQ-1 is a de facto mitigation measure. *See* CEQA Guidelines §15370. The DEIR's analysis of the Project's GHG emissions impermissibly assumes that APM-AQ-1 has been implemented *before* evaluating the significance of impacts or considering mitigation. DEIR at 4.3-65; Table 4.3-23 (p. 4.3-94). The DEIR makes no attempt to calculate what the Project's GHG emissions would be without APM-AQ-1, and does not separately quantify the emission reductions that would result from that "applicant proposed" measure. This approach prevents informed analysis of Project impacts, violating CEQA. *Lotus*, 223 Cal.App.4th at 656. The DEIR must be revised to classify the APMs as mitigation measures, analyze the Project's GHG impacts without those measures, and then evaluate the APMs' effectiveness in reducing GHG missions.

6. The DEIR's Significance Threshold for Operational GHG Emissions Is Not Supported by Substantial Evidence.

Grp 21-74

The DEIR uses an unsupported significance threshold for operational GHG emissions, understating the significance of the Project's emissions and improperly avoiding mitigation for those emissions. The DEIR calculates that the Project would generate annual operational emissions of 7,221.64 metric tons of CO_2 equivalent (MT CO_2e) in years 2022 to 2026, 6,999.63 MT CO_2e in years 2027 to 2032, and 9,041.23 MT CO_2e in years 2033 to 2102. DEIR at 4.3-93 to 4.3-94. By far the largest source of the Project's operational GHG emissions would come from

consumption of grid power by electric mining equipment. *See id.* The Project would consume 49,613 MWh of PG&E-supplied electricity annually during operations, generating 4,635.82 MT CO_2e per year. *See id.* at 4.3-88, 4.3-93 to 94.[7] Once the Brunswick and Centennial sites have reached their maximum capacity for dumped fill, and mine waste is instead trucked offsite beginning in 2033, emissions from on-road vehicles would become the second-largest source of annual GHG emissions, generating over 3,123.46 MT CO_2e per year for the remaining 70 years of the permit. *Id.* Other sources of GHG emissions generated during Project operations would include off-road vehicles and equipment, emergency generator use, underground blasting, and solid waste. *Id.* The DEIR fails to adequately analyze these emissions, and lacks adequate support for the significance threshold used to evaluate them.

Grp 21-75

The CEQA Guidelines mandate that "[i]n determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change" and that "[t]he agency's analysis should consider a timeframe that is appropriate for the project." CEQA Guidelines § 15064.4(b). "[W]hen determining the significance of impacts from greenhouse gas emissions on the environment," an EIR must consider not only "[w]hether the project emissions exceed a threshold of significance that the lead agency determines applies to the project," but also "[t]he extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting," and "[t]he extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." *Id.* GHG significance thresholds that are not supported by substantial evidence violate CEQA. *Golden Door Properties, LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 904-05.

Here, the DEIR relies on a significance threshold of 10,000 MT CO_2e per year to conclude that operational GHG emissions are less than significant, but fails to adequately justify its chosen threshold. While the DEIR acknowledges that the Project's unmitigated GHG emissions during Project construction would be significant (DEIR at 4.3-93), the DEIR claims the Project's much larger operational GHG emissions across the remainder of the 80-year permit period would be less than significant, with no need for mitigation (*id.* at 4.3-93 to 4.3-94). The DEIR sets a significance threshold of 1,100 MT CO_2e per year for the Project's construction emissions, and found that the Project would generate annual emissions of 3,444 MT CO_2e during construction, exceeding this threshold. *Id.* at 4.3-92. However, the DEIR found that the Project

[7] The DEIR does not discuss its assumptions regarding the current carbon intensity of PG&E's power generation mix, but concludes that the Project will not interfere with PG&E's ability to meet California's Renewable Portfolio Standard mandate that all electricity produced within the state be renewably sourced by the year 2045. DEIR at 4.3-88. The DEIR should disclose its assumptions regarding the carbon intensity of fuel used to generate electricity for the Project so that the full scope of its impacts are disclosed and mitigated.

would generate annual operational emissions of 7,221.64 MT CO_2e in years 2022 to 2026, 6,999.63 MT CO_2e in years 2027 to 2032, and 9,041.23 MT CO_2e in years 2033 to 2102, less than the DEIR's chosen significance threshold of 10,000 MT CO_2e per year for the Project's operational emissions. *Id.* at 4.3-93 to 4.3-94. As discussed below, the DEIR's 10,000 MT CO_2e threshold for operational emissions is not supported by substantial evidence. If the DEIR had applied an appropriate significance threshold for operational GHG emissions, impacts would be significant in every year of the permit period, and would require mitigation.

The DEIR states that "neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project." *Id.* at 4.3-42. The DEIR seeks to justify its chosen significance threshold of 10,000 MT CO_2e for operational GHG emissions by looking to other air districts. The DEIR notes that the Sacramento Metropolitan Air Quality Management District (SMAQMD), Placer County Air Pollution Control District, Bay Area Air Quality Management District (BAAQMD), and South Coast Air Quality Management District (SCAQMD) use a 10,000 MT CO_2e significance threshold for operational GHG emissions from stationary sources. *Id.* at 4.3-42 to 4.3-43. The DEIR therefore concludes that it is appropriate to use the same 10,000 MT CO_2e threshold for the Project's operational GHG emissions "because the project is an industrial project that includes stationary sources." *Id.* at 4.3-43. [8]

However, the DEIR cannot simply rely on the significance thresholds chosen by other air districts, because the justifications for adopting these thresholds are unique to each air district. *See* Exhibit A (Baseline Report) at 18-19. These air districts have prepared detailed GHG inventories to identify and evaluate strategies for achieving the statewide GHG reduction goals within their air district. *Id.* The DEIR does not discuss the justifications provided by each air district for adopting the 10,000 MT CO2e significance threshold. The DEIR cannot simply assume that the justifications used by other air districts to adopt that threshold also apply in Nevada County, which has not adopted a numerical threshold. *Id.* The DEIR thus lacks substantial evidence that this significance threshold should be applied to the Project.

Moreover, the DEIR's 10,000 MT CO_2e significance threshold is not consistent with California's latest GHG-reduction targets. Other air districts referenced in the DEIR originally adopted 10,000 MT CO_2e s GHG thresholds for stationary sources to achieve the statewide GHG reduction goal set under A.B. 32 (2006), which was to reduce GHG emissions to 1990 levels by the year 2020. *Id.*; *see* DEIR at 4.3-26. Those thresholds are now outdated. In September 2016, S.B. 32 established a new statewide target, calling for reductions in GHG emissions to 40 percent

[8] The DEIR's analysis fails to acknowledge that for 70 years of the Project's 80-year lifespan, more than 35 percent of annual operational GHG emissions will come from vehicles, which are mobile sources. *Id.* at 4.3-93 to 4.3-94. Vehicles would be the second-largest GHG emissions source during that period, after electricity consumption.

below 1990 levels by 2030. *Id.* SCAQMD's GHG threshold for stationary sources was adopted in 2008 (*see* DEIR at 4.3-42), BAAQMD's threshold was adopted in 2010, and the SMAQMD threshold was adopted in 2014. None of these thresholds were designed to meet S.B. 32's more ambitious GHG reduction mandate. The DEIR's 10,000 MT CO2e significance threshold is not consistent with the S.B. 32's statewide GHG reductions goals for 2030 and beyond. *See* Exhibit A (Baseline Report) at 18-19.

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The DEIR must use a significance threshold that will achieve California's new statewide GHG reductions goals over the proposed 80-year lifetime of the Project. In light of those state goals and the severity of climate change, *any* operational GHG emissions over existing conditions should be considered significant. Since 2010, scientific research has made clear that any additional GHG emissions will contribute to the serious and growing climate crisis. *See* Intergovernmental Panel on Climate Change, Climate Change 2021: The Physical Science Basis, Summary for Policymakers (October 2021), attached as Exhibit I. Recognizing this reality, in 2018 Governor Brown signed Executive Order 55-18, calling for the state to achieve carbon neutrality as soon as possible and no later than 2045, and to achieve and maintain net-negative emissions thereafter. *See* DEIR at 4.3-29. Given these facts, the DEIR should establish a net zero threshold for new GHG emissions from the Project. *See e.g.,* CARB 2017 Climate Change Scoping Plan, attached as Exhibit J, at 101 ("Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."). The DEIR does not explain why the Project should not be judged by a significance threshold requiring no net increase in GHG emissions.

Grp 21-77

The DEIR also fails to consider the full scope of operational emissions over the Project's 80-year lifespan. While the DEIR concludes that the Project would generate annual operational emissions of 7,221.64 MT CO_2e in years 2022 to 2026, 6,999.63 MT CO_2e in years 2027 to 2032, and 9,041.23 CO_2e in years 2033 to 2102 (DEIR at 4.3-93 to 4.3-94), it never bothers to calculate the total operational GHG emissions that will be generated from the Project over the 80-year permit period. By failing to provide this essential information, the DEIR forces the public and decisionmakers to calculate this total themselves: the Project's total operational GHG emissions over the 80-year permit period would be approximately 710,992 MT CO2e, not including construction or reclamation ((7,221.64 x 5 years)+(6,999.63 x 6 years)+(9,041.23 x 70 years)). The DEIR's failure to provide this key fact makes it inadequate as an informational document, violating CEQA. *See Banning Ranch*, 2 Cal.5th at 941-42.

Grp 21-78

Because the DEIR does not adequately analyze operational GHG emissions, its finding that those emissions are less than significant is unsupported, and there is no basis to conclude that no mitigation is required for those emissions. The DEIR must be revised to analyze operational GHG emissions against a net zero significance threshold, and must include enforceable mitigation for any net increase in GHG emissions from the Project.

SHUTE, MIHALY
& WEINBERGER LLP

7. The DEIR's GHG Mitigation Offsets Lack Adequate Performance Standards and Are Improperly Deferred.

The DEIR relies on unenforceable, improperly deferred third-party carbon credits to offset the Project's construction-related GHG emissions.[9] The DEIR finds that the Project's GHG emissions from construction are significant and require mitigation. DEIR at 4.3-92 (Impact 4.3-7; Table 4.3-23). The DEIR sets a significance threshold of 1,100 MT CO_2e per year for the Project's construction emissions, and found that the Project would generate annual emissions of 3,444 MT CO_2e during construction, exceeding this threshold. *Id.* The DEIR proposes to mitigate the Project's construction-related GHG emissions in part by requiring the Applicant to "retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 [MT CO_2e] per year construction threshold," mandating that "Rise shall retire carbon offsets equaling 2,345 MT CO2e" before Nevada County issues a grading permit for the Project. *Id.* at 4.3-96 (Mitigation Measure 4.3-7(b)).

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The DEIR thus proposes to mitigate only 68 percent of the Project's construction-related GHG emissions and the entirety of that mitigation will rely on offsets. (The DEIR includes another mitigation measure for construction-related GHG emissions, Mitigation Measure 4.3-7(a), but does not attempt to quantify that measure's effect on emissions). *Id.* at 4.3-95 to 4.3-96. Assuming that Project construction is projected to last for only one year (*id.* at 4.3-92),[10] Mitigation Measure 4.3-7(b) calls for a one-time purchase of GHG offsets, rather than a recurring annual commitment.

Here, the DEIR's proposed GHG mitigation offsets are inadequate for several reasons. First, the DEIR fails to ensure that the proposed offsets are additional, real, permanent, verifiable, and enforceable, as required by California Air Resources Board (CARB) regulations and the terms of the mitigation measure itself. Second, the proposed GHG offset mitigation measure is impermissibly deferred without adequate performance standards, in violation of CEQA. Third, the EIR fails to evaluate the foreseeable environmental impacts of offset projects. Finally, the DEIR fails to analyze additional feasible on-site mitigation for GHG emissions.

[9] The DEIR does not propose to mitigate the Project's (much larger) operational GHG emissions, because it relies on a higher significance threshold to find those emissions less than significant, as discussed in Section II.E.5, *supra*.

[10] While the DEIR's GHG analysis assumes that construction would last for one year (DEIR at 4.3-44, 4.3-92), the DEIR's project description states that construction would last for 18 months. DEIR at 3-37. The DEIR is therefore internally inconsistent. *See* Sections I.D and II.E.3, *supra*.

(a) The DEIR Fails to Ensure that Proposed Mitigation Offsets Are Additional, Real, Permanent, Verifiable, and Enforceable.

The CEQA Guidelines require that "lead agencies shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of greenhouse gas emissions" from a project. CEQA Guidelines § 15126.4(c). The Guidelines authorize "[o]ff-site measures, including offsets that are not otherwise required, to mitigate a project's emissions." *Id.* § 15126.4(c)(3). However, like other mitigation measures, such offsets "must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." *Id.* § 15126.4(a)(2).

Grp 21-80

Here, the DEIR's GHG offset mitigation measure is unenforceable, impermissibly delegates verification and enforcement to private third parties, and lacks specific performance standards essential to ensure the effectiveness of the mitigation. Mitigation Measure 4.3-7(b) defines an eligible carbon offset as "an instrument, credit or other certification verifying the reduction of GHG emissions" issued by one of three private, third-party registries: "the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard)." DEIR at 4.3-96. Measure 4.3-7(b) provides that the "protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions" from those offsets "shall . . .[b]e developed by the registries" and must "[a]dhere to the principles set forth in the program manuals of each of the aforementioned registries." *Id.* at 4.3-97. The DEIR thus delegates the task of developing appropriate protocols for the mitigation offsets to the third-party registries.

Grp 21-81

The measure requires that "[e]ach carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions." *Id.* at 4.3-97. This language parallels CARB's regulations for GHG offsets, which mandate that "[a] registry offset credit must . . . [r]epresent a GHG emission reduction . . .that is real, additional, quantifiable, permanent, verifiable, and enforceable." Cal. Code Regs., tit. 17, § 95970(a). But section 95970 is not cited or incorporated in Measure 4.3-7(b), and the mitigation measure fails to adequately ensure that these criteria will be met. The measure asserts that "[t]he protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions." DEIR at 4.3-98. However, there is no guarantee that the registry's protocols will achieve these standards.

Grp 21-82

Mitigation Measure 4.3-7(b) requires that the offset protocols and methodologies "shall . . . [b]e approved by the California Air Resources Board, and be compliant with 17 CCR § 95972." *Id.* at 4.3-97. Section 95972 mandates that GHG offset protocols must "[a]ccurately determine the extent to which GHG emission reductions and GHG removal enhancements are achieved by the offset project type," "[e]nsure GHG emission reductions and GHG removal

enhancements are permanent," and "[e]stablish the eligibility and additionality of projects using standard criteria." Cal. Code Regs., tit. 17, § 95972(a). However, Measure 4.3-7(b)'s mandate that offset protocols be CARB-approved and compliant with Section 95972 is *not* a sufficient basis to conclude that the GHG offsets used by the mitigation measure will be additional, real, permanent, quantifiable, verifiable, and enforceable.

In *Golden Door*, 50 Cal.App.5th at 511-15, the court invalidated an EIR's GHG mitigation measure which allowed the purchase of offset credits from any carbon offset registry approved by CARB. The court found that the mitigation measure violated CEQA because it lacked sufficient safeguards to ensure the GHG offsets were real, permanent, verifiable, and enforceable, as required under A.B. 32. *Id.* at 511. The court concluded that CARB's approval of a registry administering an offset did not necessarily mean an emissions reduction protocol developed by that registry complied with A.B. 32's realness, permanency, verifiability, and enforceability requirements. *Id.* at 511-512.

Mitigation Measure 4.3-7(b) has many of the same flaws as the measure invalidated in *Golden Door*. Like the offset measure in *Golden Door*, here the measure relies entirely on protocols adopted by voluntary market registries, which may not meet standards necessary to ensure that Project emissions actually will be reduced to a less than significant level. *See Golden Door*, 50 Cal.App.5th at 511-12. In fact, studies have shown that third-party offset registry protocols frequently fail to ensure compliance with standards necessary for offset quality, as explained in comments prepared by Dr. Barbara Haya in connection with a recent development project in San Diego County. *See* Comments of Barbara Haya, Ph.D. in Response to Additional Information Regarding Carbon Offset Protocols for Greenhouse Gas Emission Reduction (Sept. 17, 2020) ("Haya 2020 Comments"), attached as Exhibit K, at 1, 3-5.[11] Moreover, the measure outsources enforcement of offset standards to those same third-party registries. Measure 4.3-7(b)'s requirement that CARB approve the offset *protocol* does go slightly further than the measure invalidated in *Golden Door*, which simply required that a *registry* be approved by CARB. 50 Cal.App.5th at 511. However, CARB's approval of a protocol developed by a third-party registry is still not sufficient grounds to conclude that offsets generated under that protocol will be real, permanent, verifiable, and enforceable. Like the measure invalidated in *Golden Door*, Measure 4.3-7(b) relies on "unspecified and undefined offset protocols, occurring in unspecified locations." *Id.* at 520. Measure 4.3-7(b) therefore fails to satisfy CEQA's requirements for specific, effective, enforceable mitigation. *See* CEQA Guidelines § 15126.4.

[11] Dr. Haya is an expert in energy policy and carbon offsets at the University of California, Berkeley. Dr. Haya's comments on the Otay Ranch Resort Village (Village 13) project in San Diego County are directly relevant to the IMM Project because the EIR for that project similarly proposed the use of offsets to mitigate the project's GHG emissions.

Perhaps anticipating comparisons to the mitigation measure invalidated in *Golden Door*, Mitigation Measure 4.3-7(b) claims that it is "not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program)." DEIR at 4.3-98. But while the measure here does not purport to adhere to California's cap and trade regulations, it seeks to rely on CARB approval and CARB regulations, like the measure in *Golden Door*. Measure 4.3-7(b) expressly relies on the requirement that the offset protocols be approved by CARB and comply with the offset regulations at California Code of Regulations, title 17, section 95972 (DEIR at 4.3-97), in much the same way that the mitigation measure in *Golden Door* relied on the cap-and-trade regulations at Health & Safety Code section 38562(d)(2). The relevant substantive provisions of the regulations are similar, and the same principle applies: CARB approval and compliance with CARB regulations is not enough to ensure that GHG offsets are additional, real, permanent, quantifiable, verifiable, and enforceable.

(i) Measure 4.3-7(B) Allows Out-Of-State Offsets that May Be Unenforceable or Fall Short of California's Standards.

Like the measure invalidated in *Golden Door*, the GHG mitigation measure here also lacks adequate limits on the geographic location of GHG offsets. In *Golden Door*, the court found that the offset mitigation measure was invalid because CARB lacked the means to determine the validity of offsets located in foreign countries, including whether emissions reductions would be additional to reductions that would otherwise occur, and because CARB lacked enforcement authority over foreign offsets. 50 Cal.App.5th at 512-513.

Grp 21-83

Here, by requiring that offset protocols must comply with California Code of Regulations, title 17, section 95972 (DEIR at 4.3-97), Measure 4.3-7(b) limits offsets to those generated in the United States or its territories. (Section 95972 requires that "[a] Compliance Offset Protocol must specify where the protocol is applicable" and that "[t]he geographic boundary must be within the United States or United States Territories." Cal. Code Regs., tit. 17, § 95972(c).) However, Measure 4.3-7(b) specifies that an eligible offset "shall include, *but is not limited to*, an instrument, credit or other certification issued by [the listed] registries for GHG reduction activities within the Nevada County region." DEIR at 4.3-96 (emphasis added). Thus, the mitigation measure here does *not* require GHG offsets to be located in Nevada County or in the State of California: eligible offsets may be located in any U.S. state or territory. The measure therefore suffers from a similar problem as the one in *Golden Door*: The County lacks enforcement jurisdiction over out-of-county projects, and neither the County nor CARB has authority to enforce offsets located outside of California. Moreover, the County may lack the ability to determine the validity of offsets located in other U.S. states or territories. The mitigation measure does not require that offsets generated by out-of-state projects be subject to

laws at least as stringent as California's. The lack of narrower geographic limits on GHG offsets makes Measure 4.3-7(b) unenforceable.

(ii) Measure 4.3-7(B) Relies on Registries that Use Ineffective Protocol Methodologies.

Measure 4.3-7(b) allows the use of offsets issued by the Climate Action Reserve, the American Carbon Registry, or Verra registry, but many protocols used by those registries have been shown to be ineffective. Studies have shown that the "standardized" approach to additionality used by many Climate Action Reserve protocols has failed to ensure effective "additional" emissions reductions due to substantial "over-crediting" and leakage problems. *See* Exhibit K (Haya 2020 Comments) at 1-5. The County's reliance on registries that use Clean Development Mechanism (CDM) methodologies and additionality standards also undermines the effectiveness of proposed mitigation. *See id.* at 2. Studies have shown that offsets that rely on CDM methodologies and additionality tools do not produce additional GHG reductions. *Id.* Numerous Verra and American Carbon Standard protocols explicitly rely on CDM methodologies, CDM additionality tests, or both. *See id.* Those methodologies and tools have been imported into the named registries' manuals and protocols. Measure 4.3-7(b) provides that "[t]he Project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols." DEIR at 4.3-96. But this provision does not go far enough: while it prohibits offset purchases from the CDM registry and purports to exclude offsets generated under protocols developed by that registry, it does not expressly prohibit offsets from other registries that use equivalent methods or tools. Measure 4.3-7(b) thus fails to ensure that offsets from the Climate Action Reserve, the American Carbon Registry, or Verra will effectively mitigate Project impacts.

Grp 21-84

(iii) Measure 4.3-7(B) Relies on the County's Discretionary Review Where It Lacks Expertise.

Measure 4.3-7(b) inappropriately relies on the County's judgment to decide whether a GHG offset is adequate. DEIR at 4.3-98 to 4.3-99. The measure's "Reporting and Enforcement Standards" require that "[p]rior to issuance of requested grading permits, Rise [Gold] shall submit a report to the County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure." *Id.* at 4.3-98. The County will then review the report and determine whether the project's carbon offsets meet the requirements of the mitigation measure. *Id.* at 4.3-98 to 4.3-99.

Grp 21-85

The County's judgment is not sufficient to support a conclusion that all offset credits issued under these protocols will satisfy necessary standards. Offset protocol methodologies are a highly technical field, and there is no evidence that the County has the relevant expertise to conduct such a review. Rather, it appears likely that the County will simply accept the registries' own review of their protocols and/or CARB approval of those protocols as sufficient evidence of

their adequacy. *See id.* at 4.3-96 ("offsets may be used if report is submitted to the County "demonstrating that each registry *shall continue its existing practice* of requiring [the standards listed below] for the development and approval of protocols or methodologies") (emphasis added); *id.* at 4.3-98 ("The protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions.") The County's apparent failure to recognize that numerous protocols included in Climate Action Reserve, the American Carbon Registry, or Verra registries rely on CDM methodologies and additionality tests—even as the measure claims credits generated under CDM protocols will not be accepted—demonstrates that County officials may not be able to render an informed judgment as to whether specific protocols are adequate.

(iv) The DEIR Lacks Substantial Evidence that Measure 4.3-7(B) Would Be Effective.

Grp 21-86

When a lead agency relies on mitigation measures to find that project impacts will be reduced to a level of insignificance, there must be substantial evidence in the record demonstrating that the measures are feasible and will be effective. *Sacramento Old City Assn. v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1027; *Kings County*, 221 Cal.App.3d 690, 726-29. An agency's conclusion that a proposed mitigation measure will in fact reduce GHG emissions below the significance threshold must be both legally sound and supported by specific, quantitative evidence. *See Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 227-28.

Here, for all of the reasons discussed above, the DEIR does not provide substantial evidence to support its conclusion that GHG offsets obtained through Measure 4.3-7(b) actually will achieve the claimed reduction in emissions. The DEIR therefore lacks legal and evidentiary support for its conclusion that the Project's GHG emissions will be less than significant. The DEIR must be revised to provide enforceable mitigation for the Project's GHG emissions.

(b) The GHG Offset Mitigation Measure Is Impermissibly Deferred Without Adequate Performance Standards.

Grp 21-87

Mitigation Measure 4.3-7(b) impermissibly defers the DEIR's mitigation for the Project's construction-related GHG emissions without sufficient performance standards or assurances of effectiveness. As we explain above, CEQA allows deferral of mitigation measures until after Project approval only when it is "impractical or infeasible" to develop those measures before approval, the agency "commits itself to the mitigation," and the EIR "adopts specific performance standards" and identifies actions that can "feasibly achieve" those standards. CEQA Guidelines § 15126.4(a)(1)(B). These requirements apply to mitigation measures that employ GHG offsets. *See id.* § 15126.4(c)(3). Mitigation for a project's GHG impacts is impermissibly deferred if it relies on development of future management plans without articulating specific,

objective performance standards and providing assurances that the proposed mitigation will be effective. *Golden Door*, 50 Cal.App.5th at 518-525; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92-95.

The court in *Golden Door* concluded that the GHG offset mitigation measure in that case violated CEQA because it improperly deferred development of the mitigation until after project approval, leaving it for County officials to later determine whether particular offsets met the criteria for the mitigation measure. 50 Cal.App.5th at 518-25. The court found that the mitigation measure lacked adequate performance standards to guide the exercise of the County's discretion in approving these deferred GHG offsets. *Id.* The mitigation measure allowed County officials to determine whether any particular offset program was acceptable based on subjective criteria, including that offsets located geographically closer to the County were not "available" or "financially feasible," and that the offset registry must be "reputable." *Id.* at 520-22.

Here, Measure 4.3-7(b) similarly defers the County's determination as to whether GHG offsets are adequate until after Project approval. DEIR at 4.3-98 to 4.3-99. The measure's "Reporting and Enforcement Standards" require that "[p]rior to issuance of requested grading permits, Rise [Gold] shall submit a report to the County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure." *Id.* at 4.3-98. The County will then review the report and determine whether the project's carbon offsets meet the requirements of the mitigation measure. *Id.* at 4.3-98 to 4.3-99. Grading permits may be issued once the County approves the use of the offsets as mitigation. *Id.*

Like the measure invalidated in *Golden Door*, Measure 4.3-7(b) fails to provide specific, objective performance standards to ensure that the GHG offsets will effectively mitigate Project impacts. The measure requires that "[e]ach carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions." *Id.* at 4.3-97. However, the mitigation measure fails to adequately ensure that these criteria will be met, as discussed above in Section II.C.6(a). Measure 4.3-7(b) provides that the "protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions" from those offsets "shall . . .[b]e developed by the registries" and must "[a]dhere to the principles set forth in the program manuals of each of the aforementioned registries." *Id.* at 4.3-97. The DEIR thus delegates the task of developing appropriate protocols for the mitigation offsets to the third-party registries. The measure asserts that the registries' protocols require carbon offset projects to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. *Id.* at 4.3-98. Again, there is no guarantee that the registry's protocols will achieve these standards.

Grp 21-88

As discussed above in Section II.E.6(a), Measure 4.3-7(b)'s mandate that offset protocols be CARB-approved and compliant with Cal. Code Regs., tit. 17, § 95972 is *not* a sufficient basis

to conclude that the GHG offsets used by the mitigation measure will adequately mitigate Project impacts. The GHG mitigation measure invalidated in *Golden Door* called for the use of CARB-approved offset registries and required offsets to be "consistent" with Health & Safety Code § 38562(d)(2). 50 Cal.App.5th at 518. The court nevertheless found the measure improperly deferred because it relied on "unspecified and undefined offset protocols, occurring in unspecified locations." *Id.* at 520.

The same is true here: Measure 4.3-7(b) does not specify what offset protocols must be used, or where offsets must occur, and requiring CARB approval of offset protocols does not cure this defect. Asserted compliance with regulatory standards is not a sufficient ground to conclude that a project's impacts would be less than significant. *Californians for Alternatives to Toxics v. Dept. of Food & Agriculture* (2005) 136 Cal.App.4th 1, 15-17. And requiring approval from responsible regulatory agencies cannot make up for a lack of performance standards in a deferred mitigation measure. *County of Merced*, 149 Cal.App.4th at 669-70 (mitigation measure for mining project impermissibly deferred despite requiring "concurrence of applicable regulatory agencies").

The DEIR also violates CEQA by failing to demonstrate why it is "impractical or infeasible" to identify the mitigation offset protocols or offsets that will be used prior to Project approval. Measure 4.3-7(b) is also improperly deferred for this reason. *See* CEQA Guidelines § 15126.4(a)(1)(B). Measure 4.3-7(b) must be revised to identify which offset protocols will be used, and where offset projects will be located.

(i) Measure 4.3-7(B) Improperly Allows Offsets Based on "Forecasted" Emissions Reductions.

Grp 21-89

Measure 4.3-7(b) is also inadequate because it allows offsets based on "forecasted" emissions reductions. *See* DEIR at 4.3-97 ("any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past *or forecasted* reduction or sequestration of one MT of CO2e") (emphasis added). Reliance on "forecasted" reductions that have not yet occurred would allow the adverse impacts of GHG emissions to persist, potentially for many years, before being mitigated. CEQA does not permit an agency to defer implementation of mitigation measures until after significant impacts occur. *King & Gardiner Farms*, 45 Cal.App.5th at 860. Rather, "[o]nce the project reaches the point where activity will have a significant adverse effect on the environment, the mitigation measures must be in place." *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 738.

Measure 4.3-7(b)'s reliance on future "forecasted" reductions to mitigate present GHG emissions fails to address the Project's immediate climate impacts. Delaying implementation of climate mitigation has a real, adverse effect on warming; although CO_2 persists in the atmosphere for centuries, the maximum warming effect of a pulse of CO_2 emissions occurs

within a relatively short time frame. *See* Katharine L. Ricke & Ken Caldeira, Maximum warming occurs about one decade after a carbon dioxide emission, 2014 Environ. Res. Lett. 9 124002, attached as Exhibit L. Accordingly, even if a "forecasted" reduction eventually occurs, the Project's emissions will be in the atmosphere at least until that time, exacerbating climate impacts.[12] Measure 4.3-7(b)'s use of "forecasted" emissions reductions would allow the Project's GHG impacts to occur before they are mitigated, violating CEQA. *King & Gardiner Farms*, 45 Cal.App.5th at 860.

The registries relied on by Measure 4.3-7(b) acknowledge this time lag in emissions reductions. The Program Manual for Climate Action Reserve's "Climate Forward" program states that project emissions may occur well in advance of "forecasted reductions." The manual explains the difference between offsets (which represent emissions reductions verified to have already occurred) and "forecasted mitigation units" (or "FMUs") that might occur in the future. Climate Forward Program Manual, March 2020, attached as Exhibit M, at 6-7. The manual explicitly acknowledges "that there could be a time period, or a temporal disconnect, between the occurrence of the emissions and the occurrence of reduction or sequestration represented by" Climate Forward projects; "[t]hat is, the emission reductions expected to be generated might occur after the actual emissions from the new initiative." *Id.* at 7. Climate Action Reserve thus advises developers to ensure that credits based on "forecasted" emissions will be accepted for CEQA purposes before purchase. *Id.* at 6. The "temporal disconnect" between emissions and reductions is incompatible with CEQA's standards. The DEIR should be revised to remove all references suggesting the Project may rely for mitigation on "forecasted" emissions reductions.

(ii) There Is No Way for the County to Enforce Offsets After Grading Permits Are Issued.

Grp 21-90

Once grading permits for the Project are issued, the County will effectively lose its ability to enforce the DEIR's GHG offset mitigation. If the County later determines that previously retired offset credits no longer meet standards, its only recourse is to "cease permitting activities." DEIR at 4.3-99. Measure 4.3-7(b) provides that "[T]he County may issue a notice of non-consistency and cease permitting activities in the event that the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until Rise has demonstrated that the previously provided carbon offsets are compliant

[12] Even if instruments promising forecasted reductions have been secured before Project construction occurs, the "offsets" themselves—i.e., the actual reductions necessary to offset Project emissions—may not occur until well after emissions are generated by the Project.

with the standards herein or have provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction." *Id.*

However, this provision does nothing to address the scenario in which the County approves the GHG offsets, issues all applicable permits for the Project, and then later discovers that the offset protocol is not being followed. This is especially problematic because Measure 4.3-7(b) allows offsets based on "forecasted" emissions reductions that have not yet occurred at the time the offset is retired and permits are issued. *See* DEIR at 4.3-97. If permits already have been issued, not "resuming" permitting activities is an empty gesture. Like the measure invalidated in *Golden Door*, Measure 4.3-7(b) relies almost entirely on third party registries and project developers over whom the County has no direct enforcement authority. Measure 4.3-7(b) therefore fails to provide enforceable mitigation as required by CEQA. CEQA Guidelines § 15126.4(a)(2).

(c) The EIR Fails to Evaluate the Foreseeable Environmental Impacts of Offset Projects.

Grp 21-91

CEQA requires an EIR to address the potentially significant environmental impacts of proposed mitigation measures. CEQA Guidelines § 15126.4(a)(1)(D). Here, the DEIR fails to consider whether the GHG offsets used as mitigation may cause significant and adverse environmental effects. GHG offset projects may have significant environmental impacts. Just by way of example, the protocols may contemplate construction of organic waste digesters and gas recovery units; changes in forest, wetlands, and rangelands management; construction of carbon capture and storage facilities; installation of landfill gas projects; and construction of new cogeneration facilities. Any one of these activities may have foreseeable direct and indirect environmental impacts. Because the DEIR has identified a set of registries that will generate eligible offset credits (DEIR at 4.3-96), the County cannot claim the environmental impacts of reliance on those registries' offset projects are entirely speculative. The EIR's failure to consider the environmental impacts associated with Measure 4.3-7(b) violates CEQA's standards.

(d) The DEIR Fails to Analyze Additional Feasible On-Site Mitigation for GHG Emissions.

Grp 21-92

The EIR fails to ensure that GHG reductions are achieved from on-site mitigation measures to the maximum extent feasible before offsets are purchased. CEQA provides that "public agencies should not approve projects as proposed if there are . . . feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." Pub. Resources Code § 21002; *see id.*, § 21002.1(b) (agencies must mitigate significant effects of projects they approve "whenever it is feasible to do so"); CEQA Guidelines §15126.4(a)(1) ("An EIR shall describe feasible measures which could minimize significant adverse impacts."). Because of the known problems with enforcement and additionality of offsets, agencies typically strictly limit the use of offsets as part of an overall emissions reduction

program. CARB's 2017 Climate Change Scoping Plan Update cautions that reliance on offset credits is appropriate only where further on-site reductions and direct local investments "are infeasible or not proven to be effective." *See* CARB 2017 Climate Change Scoping Plan Update, attached as Exhibit J, at 102. California's cap and trade program currently allows regulated emitters to use GHG offsets to fulfill no more than four percent of their GHG reduction obligations, and at least half of the offsets used must "provide direct environmental benefits in state." Health & Saf. Code § 38562(c)(2)(E).

Here, by contrast, *100 percent* of the mitigation for the Project's construction-related GHG emissions will rely on offsets, and there is no requirement that those offsets be located in California. *See* DEIR at 4.3-96.[13] The DEIR's excessive reliance on GHG offsets to mitigate all of the Project's construction emissions conflicts with established state policy, which limits offset use. The DEIR fails to adequately consider alternative mitigation measures.

The DEIR includes another mitigation measure for construction-related GHG emissions, Mitigation Measure 4.3-7(a), which calls for electric-powered or non-diesel construction equipment where feasible, carpooling for construction workers, and the use of locally sourced or recycled construction materials. *Id.* at 4.3-95 to 4.3-96. However, these measures lack any specificity or enforceability and the DEIR makes no attempt to quantify that measure's effect on emissions. *Id.* Mitigation Measure 4.3-7(a) calls for construction emissions to be reduced to the DEIR's chosen significance threshold of 1,100 MT CO_2e using GHG offsets, but does not mandate any reduction below that level. *Id.* at 4.3-96.

The DEIR does not explain why it is infeasible to require that all GHG offsets used by the Project be located in California. The DEIR also fails to show that further on-site GHG mitigation measures for construction emissions are infeasible or ineffective. For example, the DEIR does not consider whether more of the existing vegetation on the site could be preserved rather than removed. Nor does it consider whether any of the Project's electricity demand during construction could be met via the use of solar-powered equipment (e.g. portable solar-powered lighting). The DEIR also fails to require vehicle electrification of the mine's truck fleet as well as the trucks that serve the mine. The DEIR must be revised to consider additional feasible on-site measures to reduce the Project's GHG emissions.

F. The DEIR Fails to Adequately Analyze and Mitigate the Project's Impacts on Energy Use.

Grp 21-93

The DEIR's analysis of Project energy use suffers from several flaws. First, the DEIR fails to analyze the Centennial cleanup's energy use, or additional energy consumption by the

[13] As noted above, the DEIR should use a no net increase threshold to determine whether the Project will have significant GHG emissions and should require mitigation for all of the Project's GHG emissions, not just a portion of them.

IMM Project if the Centennial cleanup does not occur. Second, the DEIR's analysis of energy use from Project construction assumes a construction timeline that contradicts the Project description. Finally, the DEIR improperly relies on assumed mitigation measures for energy impacts, failing to acknowledge those measures as mitigation. The DEIR must be revised to address these deficiencies.

1. The DEIR Fails to Analyze the Centennial RAP's Energy Usage.

Grp 21-94

The DEIR must include the Centennial RAP as part of the Project, and must analyze all of the environmental impacts resulting from the RAP, as discussed in Sections I.C, II.D.1 and II.E.1, *supra*. Accordingly, the DEIR must evaluate the Centennial cleanup's energy usage. The Centennial RAP would involve cement mixing, excavation and grading of 36.7 acres of land, and the use of backhoes and other heavy equipment. Exhibit G (MND) at 3-4; Exhibit E (RAP) at 44. The DEIR improperly fails to disclose or analyze the impacts of these RAP activities on energy use. DEIR at 4.3-66 to 4.3-102. The DEIR's omission of these impacts prevents informed analysis and violates CEQA. *See County of Inyo*, 172 Cal.App.3d at 165-66; *Nelson*, 190 Cal.App.4th at 271.

2. The DEIR Fails to Analyze Energy Use that May Result from the IMM Project if the Centennial Cleanup Does *Not* Occur.

Grp 21-95

The DEIR also fails evaluate additional energy use that would result from the Project if the Centennial cleanup does not occur. The DEIR acknowledges that the Centennial Site might never be remediated during the 80-year term of the mine permit, which would require trucking an additional 1.6 million tons of mine waste to offsite locations after the Brunswick Site is full. DEIR at 1-3, 3-32 to 3-33, 3-26. The DEIR must evaluate the energy usage (e.g. fuel consumption) associated with that additional offsite trucking, but fails to do so. Instead, the DEIR simply assumes that the Centennial RAP will be completed and that fill dumping at the Centennial site will occur in the first five years of Project operations. *See id.* at 4.3-50, 4.3-53 to 4.3-54, 4.3-67 to 4.3-68. As discussed in Sections I.B, II.D.2 and II.E.2, *supra*, the DEIR must consider the possibility that the RAP may never occur and analyze the impacts that would result in that scenario. If the Centennial RAP is never completed and no fill is ever placed at the Centennial site, that fill must be trucked offsite for an additional five years, resulting in additional fuel consumption. The DEIR's failure to disclose or analyze this impact deprives the public and decision-makers of essential information in violation of CEQA. *See Banning Ranch*, 2 Cal.5th at 941-42.

3. The DEIR's Analysis of Construction Energy Use Contradicts the Project Description.

Grp 21-96

The DEIR's analysis of energy use from Project construction is unsupported because its assumptions regarding the duration of construction contradict the Project description. The

DEIR's project description states that Project construction would last for 18 months. DEIR at 3-37. By contrast, the DEIR's energy analysis assumes that Project construction would last for only 12 months, and bases its impact evaluation on that assumption. DEIR at 4.3-44 to 4.3-46. The DEIR is therefore internally contradictory. "[S]uch an unexplained discrepancy precludes the existence of substantial evidence" for the EIR's conclusions. *Preserve Wild Santee*, 210 Cal.App.4th at 284. The DEIR asserts that "the construction scenario assessed herein is the worst-case, because if the same construction activities were to be spread over a longer period (i.e., a period in excess of 12 months), the amount of overlap of equipment usage would be reduced." *Id.* at 4.3-44. The DEIR fails to consider whether an 18-month construction period could result in greater total energy use than a 12-month construction period. The DEIR's energy analysis must be revised to assume the same construction duration as the Project description.

4. The DEIR Improperly Relies on Assumed Energy Use Mitigation Measures, Preventing Informed Impact Analysis.

As discussed above, the DEIR lists several "applicant-proposed emissions reduction measures" which it does not classify as mitigation, and simply assumes that those measures would be implemented when conducting impact analysis. DEIR at 4.3-65; *see* Sections II.D.4 and II.E.4, *supra*. The APMs were not identified as Project features in the Project description, and there is no assurance that these measures will be implemented as a part of the Project. *See* Exhibit A (Baseline Report) at 14. These "applicant-proposed" measures are in reality mitigation measures, which the DEIR improperly fails to recognize as such. As explained above, this approach violates CEQA. *Lotus*, 223 Cal.App.4th at 656. A project's significant impacts must be determined first, and then the CEQA document must identify enforceable mitigation and evaluate its effectiveness in addressing project impacts. *Id.* at 656, 658.

Grp 21-97

This error invalidates the DEIR's analysis of energy usage, just as it does for the air quality and GHG analyses. In addition to requiring Tier 4 engines, applicant-proposed measure APM-AQ-1 (Exhaust Emission Controls) requires that "[u]nnecessary construction vehicle idling time shall be minimized" and that "[a]ll off-road equipment shall be maintained in accordance with manufacturer's specifications." DEIR at 4.3-65. APM-AQ-1 thus seeks to reduce the Project's energy consumption as well as its air quality and GHG impacts. *Id.* at 4.3-87 (concluding that APM-AQ-1 would "avoid inefficient energy consumption in several ways"). These measures are vague and unenforceable and cannot be relied upon to demonstrate any reductions in the Project's air quality, GHG, or energy impacts.

Even if APM-AQ-1 were specific and enforceable, it is a de facto mitigation measure. *See* CEQA Guidelines §15370. The DEIR's analysis of the Project's energy usage impermissibly assumes that APM-AQ-1 has been implemented *before* evaluating the significance of impacts or considering mitigation. DEIR at 4.3-65, 4.3-87 to 4.3-88, 4.3-102. The DEIR makes no attempt to calculate what the Project's energy usage would be without APM-AQ-1, and does not

separately quantify the emission reductions that would result from that "applicant proposed" measure. This approach prevents informed analysis of Project impacts, violating CEQA. *Lotus*, 223 Cal.App.4th at 656. The DEIR must be revised to classify the APMs as mitigation measures, and must evaluate their effectiveness in reducing energy usage.

G. The DEIR's Analysis of Project Alternatives Is Inadequate.

Under CEQA, a proper analysis of alternatives is essential to comply with the Act's mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Resources Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443-45. As stated in *Laurel Heights I*, "[w]ithout meaningful analysis of alternatives in the DEIR, neither the courts nor the public can fulfill their proper roles in the CEQA process. . . . [Courts will not] countenance a result that would require blind trust by the public, especially in light of CEQA's fundamental goal that the public be fully informed as to the consequences of action by their public officials." 47 Cal.3d at 404.

Grp 21-98

Critically, an EIR must consider a "reasonable range" of alternatives "that will foster informed decision-making and public participation." CEQA Guidelines § 15126.6(a); *Laurel Heights* I, 47 Cal.3d at 404 ("An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision-making."). The discussion of alternatives must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines § 15126.6(b). The DEIR for the Project fails to heed these basic mandates.

1. The DEIR Fails to Include a Reasonable Range of Alternatives.

As described throughout this letter, the DEIR fails to adequately describe the Project and fails to reveal the severity and extent of numerous environmental impacts. In many instances, the DEIR incorrectly determines that impacts would be less than significant. As we explained, the DEIR incorrectly found the Project's impacts to air quality, GHG emissions, energy, hazards, hazardous materials, hydrology, water quality, noise, and vibration to be less than significant. Had the DEIR conducted a proper impact analysis, it should have recognized that numerous, if not all of these impacts would be significant and unavoidable. In this case, the DEIR would have been obligated to identify and evaluate alternatives to the Project capable of reducing those impacts. CEQA Guidelines § 15126.6 (b). Thus, the DEIR must be recirculated to analyze the Project's full environmental impacts and identify mitigation measures or alternatives that could feasibly avoid or minimize those impacts.

Grp 21-99

Grp 21-100

However, even for those significant impacts that the DEIR does acknowledge, the document's analysis of alternatives is deficient. The DEIR determines that the Project would

result in significant and unavoidable impacts relating to aesthetics, noise, and transportation. DEIR at 6-7, 6-8. Yet, except for the "No Project" alternative, which "would not meet any of the project objectives," none of the examined alternatives would reduce the Project's impacts on aesthetics, noise, and transportation to a less than significant level. *See* DEIR at 6-44. In fact, in certain instances, the Project's alternatives would result in similar or even greater impacts than the proposed Project. *Id.*

While there is no "magic number" for how many alternatives an EIR should examine to present a "reasonable range," at a minimum CEQA requires an agency to examine at least potentially feasible alternatives to try to avoid or substantially lessen significant environmental impacts that are central to a project. *See Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089-90 (EIR was deficient for failing to include reduced development alternative that would avoid or substantially lessen the project's primary growth-related significant impacts); *Habitat and Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1285, 1305 (invalidating EIR that failed to discuss any feasible alternative addressing the project's primary water supply impact). Furthermore, with the inherent dangers and environmental harms associated with underground mining activities that will impact the environment for a minimum of 80 years, in close proximity to existing residential and other land uses, the DEIR should evaluate multiple alternatives in order to help inform the decisionmakers and the public of the environmental consequences of this Project.

Other than the "No-Project" alternative, the DEIR identifies only three alternatives: Alternative 2: the Elimination of Centennial Industrial Site and Expansion of Brunswick Fill Pile; Alternative 3: Expansion of Centennial Engineered Fill Pile and Elimination of Brunswick Engineered Fill Pile; and Alternative 4: Reduced Throughput. Again, by the DEIR's own admission, each of these alternatives would result in significant and unavoidable impacts relating to aesthetics, noise, and transportation. DEIR at 6-44.

2. The DEIR Does Not Provide a Meaningful Comparison of the Project and the Alternatives.

Grp 21-101

The Project's objectives are defined so narrowly that they essentially call for the Project itself. An EIR cannot provide a meaningful comparison between a proposed project and various alternatives unless the project's objectives are defined broadly enough to make such options at least potentially possible. *See Kings County Farm Bureau*, 221 Cal.App.3d at 735-37; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455. Here, the DEIR calls for the construction of an underground gold mine operation that will produce 1,000 tons per day (365,000 tons per year) of gold mineralization on property that Rise Grass Valley, Inc. owns. DEIR at 3-11. This is tantamount to saying that the objective of the Project is to implement the Project. Narrowing the Project's goals in this way tilts the analysis of alternatives unavoidably—and illegitimately—toward the Project as proposed. Rather than providing the required reasoned,

objective analysis, the DEIR has become "nothing more than [a] post hoc rationalization[]" for a decision already made. *Laurel Heights I*, 47 Cal.3d at 394.

3. All of the Project Alternatives Incorrectly Assume the Remediation of the Centennial Site.

Grp 21-102

All three of the Project alternatives assume the remediation of the Centennial Site. As we explain throughout this letter, DTSC has not yet approved the Centennial Site cleanup, which is currently undergoing a separate CEQA review. Because DTSC might not approve the cleanup, and Rise Gold might not complete it, the DEIR's use of a hypothetical post-remediation baseline in its alternatives analysis is inappropriate. The revised DEIR's alternatives analysis must evaluate the impacts of each alternative assuming the remediation is not completed.

4. The Revised EIR Should Evaluate Alternatives that Avoid the Project's Significant Environmental Impacts and that Would Be Consistent with the County's and the City's General Plans.

Grp 21-103

The revised DEIR must examine feasible Project alternatives that could reduce the Project's significant environmental impacts. CEA explicitly requested that the DEIR analyze alternative locations for the dumping of waste rock and tailings from the mine. The DEIR fails to consider this alternative.

Grp 21-104

Moreover, the DEIR errs because it does not seriously consider an alternative industrial use that would be consistent with the Industrial designation on the Brunswick site and the Industrial /Urban Medium Density designation on the Centennial site.[14] While the DEIR did discuss alternative uses under the No Project alternative (*see* DEIR at pp 6-11 through 6-13), it rejects such an alternative from further consideration claiming that such a use would be more intensive than the proposed Project. *Id.* Yet, the DEIR certainly could have considered a less intensive alternative use than that proposed by the No Project alternative. For example, a mixed use employment center not requiring a use permit would be more in keeping with the aesthetics of this entry point to the City. To the extent the County would argue that it need not consider

[14] The County's General Plan designates the Centennial site as "Industrial" whereas the City of Grass Valley designates the Centennial site as "Urban Medium Density." If approved, the Project would violate the County's General Plan policy calling for its land use designations to be consistent with the City's designations: Nevada County General Plan Land Use Policy 1.8.3: *Within the City/Town spheres of influence, the Nevada County General Plan Land Use Maps will generally reflect the City's/Town's General Plan land use mapping. In some instances, the County may provide for a less intensive land use due to infrastructure capability, environmental constraints or effect on land use and development patterns outside the city's sphere. However, the County's Plan will not preclude implementation of the City's/Town's Plan by providing for a significantly more intensive land use than the City's/Town's Plan.*

alternatives that do not meet the Project's objectives, this argument would have no merit. An EIR cannot provide a meaningful comparison between a proposed project and various alternatives unless the project's objectives are defined broadly enough to make such options at least potentially possible. *Kings County Farm Bureau*, 221 Cal. App. 3d at 735-37; *City of Santee v. County of San Diego* 214 Cal. App. 3d 1438, 1455 (1989). Here, the DEIR states that a gold mine operation must be built as planned by the proposed Project. DEIR at 6-2. This is tantamount to saying that the objective of the Project is to implement the Project. Narrowing the Project's goals in this way tilts the analysis of alternatives unavoidably—and illegitimately—toward the IMM Project as proposed. Rather than providing the required reasoned, objective analysis, the DEIR has become "nothing more than [a] post hoc rationalization[]" for a decision already made. *Laurel Heights I*, 47 Cal. 3d at 394. CEQA forbids the use of this sort of circular logic to justify a project. Accordingly, the revised DEIR must consider a less intensive alternative use alternative, and one that is consistent with the County's and the City's General Plans.

5. The County May Not Approve the Project if a Feasible Alternative Exists that Would Meet the Project's Objectives and Would Diminish Its Significant Environmental Impacts.

Grp 21-105

Under CEQA, an agency may not approve a proposed project if a feasible alternative exists that would meet a project's objectives and would diminish or avoid its significant environmental impacts. Pub. Res. Code § 21002; *Kings County Farm Bureau*, 221 Cal.App.3d at 731; *see also* CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); *Citizens for Quality Growth*, 198 Cal.App.3d at 443-45. An alternative need not meet every Project objective or be the least costly in order to be feasible. *See* CEQA Guidelines § 15126.6(b).

The DEIR readily admits that Alternative 2: Elimination of Centennial Industrial Site and Expansion of Brunswick Fill Pile is the environmentally superior alternative. DEIR at 6-42. It further acknowledges that this alternative would further nearly all of the Project objectives. *Id.* at 6-42, 6-43. Consequently, approval of the Project, or any alternative project with greater impacts than Alternative 2 would violate CEQA.

III. The DEIR Must Be Recirculated.

Grp 21-106

Under California law, this DEIR cannot properly form the basis of a final EIR. CEQA and the CEQA Guidelines describe the circumstances that require recirculation of a draft EIR. Such circumstances include: (1) the addition of significant new information to the EIR after public notice is given of the availability of the DEIR but before certification, or (2) the draft EIR is so "fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." CEQA Guidelines § 15088.5.

Here, both circumstances apply. Decisionmakers and the public cannot possibly assess the Project's impacts, or even its feasibility, through the present DEIR, which is riddled with errors. Among other fundamental deficiencies, the DEIR repeatedly understates the Project's significant environmental impacts and concludes incorrectly that these impacts would be less than significant. It also assumes that unformulated or clearly useless mitigation measures will effectively reduce these impacts. And the DEIR's Project Description is so unstable and uncertain that meaningful review of the Project's environmental impacts is essentially impossible. In order to resolve these issues, the County must prepare a revised EIR that would necessarily include substantial new information.

Conclusion

As set forth above, the DEIR suffers from numerous deficiencies, many of which would independently render it inadequate under CEQA. Taken as a whole, the deficiencies of the DEIR necessitate extensive revision of the document and recirculation for public comment.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Ellison Folk

cc: Ralph Silberstein, Community Environmental Advocates Foundation

Exhibits:

Exhibit A: Baseline Environmental Consulting Report, February 15, 2022.

Exhibit B: Salter Report, March 9, 2022.

Exhibit C: Draft Final Remedial Action Plan for Centennial M-1 Property, January 25, 2021.

Exhibit D:	Email from Dean Wright, Project Manager, DTSC, to Ralph Silberstein, February 4, 2022.
Exhibit E:	Central Valley Regional Water Quality Control Board, Review of Draft Final Remedial Action Plan Centennial M-1 Property, Nevada County, September 24, 2021.
Exhibit F:	Department of Toxic Substances Control, Voluntary Cleanup Agreement for Centennial M-1 Property, September 3, 2019.
Exhibit G:	Initial Study/Mitigated Negative Declaration for Remedial Action Plan for the Centennial M-1 Property, July 23, 2021.
Exhibit: H:	Safeguards for Well Owners and the Idaho-Maryland Mine, CEA Foundation, December 1, 2021.
Exhibit I:	Intergovernmental Panel on Climate Change, Climate Change 2021: The Physical Science Basis, Summary for Policymakers, October 2021.
Exhibit J:	CARB 2017 Climate Change Scoping Plan Update.
Exhibit K:	Comments of Barbara Haya, Ph.D. in Response to Additional Information Regarding Carbon Offset Protocols for Greenhouse Gas Emission Reduction, Sept. 17, 2020.
Exhibit L:	Katharine L. Ricke & Ken Caldeira, *Maximum warming occurs about one decade after a carbon dioxide emission*, 2014 Environ. Res. Lett. 9 124002.
Exhibit M:	Climate Action Reserve, Climate Forward Program Manual, March 2020.

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SHUTE, MIHALY
& WEINBERGER LLP

Exhibit A

BASELINE ENVIRONMENTAL CONSULTING

15 February 2022
22204-00

Laurel L. Impett
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: **Review of Idaho-Maryland Mine Project, Draft Environmental Impact Report, SCH# 2020070378**

Dear Ms. Impett:

Grp 21-107

At your request, Baseline Environmental Consulting has reviewed the Hazards and Hazardous Materials, Hydrology and Water Quality, and Air Quality, Greenhouse Gas Emissions and Energy sections (and associated technical studies) of the Draft Environmental Impact Report (DEIR) for the proposed Idaho-Maryland Mine Project dated December 2021 and prepared for the County of Nevada (County). In order to provide a meaningful context for the analyses of the sections listed above, we also reviewed the DEIR Project Description. Following are our comments on the DEIR, organized by topical sections.

DEIR SECTION 4.7 HAZARDS AND HAZARDOUS MATERIALS

Legacy Contamination, Project Segmentation, and CEQA Baseline

Grp 21-108

The types of geological materials/rock historically mined at the site contain heavy metals, and when excavated, the waste rock and mine tailings have been found to contain contaminants that pose a potential risk to people and the environment. The Centennial Industrial Site was historically used by the Idaho-Maryland Mine to deposit mine tailings and waste rock. The DEIR (page 4.7-3) confirms that:

> *Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock, and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species. As a result, under existing conditions, the majority of the Centennial Industrial Site cannot be developed due to unstable soils and/or contamination.*

Per the California Department of Toxic Substances Control (DTSC) EnviroStor database, the Centennial Industrial Site is characterized as follows:

388 17th Street, Suite 230, Oakland, CA 94608 | P: (510) 420-8686 | www.baseline-env.com

> *Based upon information from existing documents, mining waste rock and mine tailings are present throughout much of the property. Results of sampling that has been completed to date indicates that the soil at the site contains lead, arsenic, nickel, and mercury at maximum concentrations of 35,111 milligrams per kilogram (mg/kg), 3010 mg/kg, 2100 mg/kg, and 41 mg/kg, respectively. These concentrations are above background and California hazardous waste levels.*

Based on this DTSC description, the existing waste rock and mine tailings that were generated from historic mining activities contain contaminants at levels exceeding regulatory thresholds, including California hazardous waste thresholds. These existing waste rock and mine tailings at the Centennial Industrial Site have been present (and have represented a persistent environmental hazard) since the former mining operation at the site shut down over 60 years ago (circa 1956). In 2019, the owner of the Centennial Industrial Site entered into a Voluntary Cleanup Agreement with the DTSC to address the hazard associated with the legacy waste rock and mine tailings generated from previous mining operations. It should be noted that cleanup actions were not initiated by the site owner until they were ready to reopen the mine.

The DEIR inappropriately establishes a future baseline condition (that may or may not actually exist in the future) for the DEIR hazards analysis as follows (DEIR page 4.7-1):

> *As discussed in Section 1.3, "Approach To Centennial Industrial Site Baseline," of this EIR, for the purposes of this hazards analysis, the environmental baseline for the Centennial Industrial Site has been adjusted to be consistent with anticipated site conditions at the completion of the separate Centennial Industrial Site Clean-up Project.*

This is clearly not allowed by CEQA. CEQA Guidelines Section 15125 states:

> *An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.*

In addition, the timing of the action related to the proposed cleanup of the legacy contamination (which began in 2019 – over 60 years after the waste was placed at the site) strongly indicates that the cleanup is related to, and part of the proposed mine reopening project (i.e., the site owner would not have entered into a Voluntary Cleanup Agreement unless they were planning to reopen the mine). Development of the Centennial Industrial Site for reopening of the mine is contingent on the completion of cleanup activities. However, the preparers of the DEIR have separated the project that would clean up the existing waste rock

and mine tailings contamination at the Centennial Industrial Site from the proposed new mining project. The DEIR asserts that these are two separate projects.

By separating the two projects (the waste rock cleanup and the proposed new mining activities), the applicant is violating the CEQA Guidelines (Section 15378). The CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment. Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact.

The DEIR should be revised to address the current baseline condition and segmentation of the environmental review process, which would require the project to include the cleanup of legacy contamination at the Centennial Industrial Site.

Project-related Waste Rock and Mine Tailings

Grp 21-109

Neither the DEIR Project Description nor the Hazards and Hazardous Materials section adequately describes how future waste rock and mine tailings generated by the proposed project would be managed to ensure that they do not pose a health hazard to people or the environment (as the placement of similar waste materials from the same mine did in the past). Since Section 4.7 Hazards and Hazardous Materials of the DEIR contains almost no discussion of the impacts associated with generation and disposal of potentially hazardous mine waste, it should be revised to include a detailed description of waste rock and mine tailings, including all historic analytical data and chemical characterization of the waste, so that the reader can gain a better understanding of the nature of this waste.

The DEIR provides little or no analytical data that demonstrates the chemical quality of the rock proposed to be mined would differ in any way from the rock that was mined historically. In the absence of data to the contrary, it is reasonable to assume that any newly generated waste rock and mine tailings would have similar chemical characteristics as the rock mined in the past. Therefore, the waste rock and mine tailings generated by the proposed project will almost certainly contain metals contaminants that could pose a health risk to people and the environment, and the DEIR includes no detailed plan as to how these contaminated wastes will be managed so that they do not create another environmental hazard. In fact, the DEIR appears to try to "rebrand" the waste rock and mine tailings as "engineered fill", apparently in the hopes that the waste material can be transported off-site for use at various unspecified

construction sites throughout the region as fill material, which would almost certainly result in numerous new contaminated wastes sites that pose a threat to the public and the environment. Unless it can be clearly demonstrated using substantial evidence that the waste rock and mine tailings can be safely used at uncontrolled constructions sites, this waste management option should be eliminated from the proposed project and the DEIR.

The only assurance provided by the DEIR (in section 4.8 Hydrology and Water Quality) that the project would not create another environmental hazard associated with placement of waste rock and mine tailings at the Centennial Industrial Site, which is already contaminated with previous placement of waste rock and mine tailings, is as follows (DEIR page 4.8-50):

> *Rise will be required as part of the project to submit a Report of Waste Discharge and obtain Waste Discharge Requirements from the Regional Water Quality Control Board for construction of the engineered fill areas.*

It is not adequate to state that the project will get permits without providing substantial evidence that the proposed action will not result in environmental impacts, particularly when very similar historic actions have been demonstrated to result in environmental impacts that have persisted for decades.

DEIR SECTION 4.8 HYDROLOGY AND WATER QUALITY

Impacts to Groundwater Resources and Domestic Water Supply Wells

The proposed project would intentionally affect local groundwater resources by dewatering the aquifer in the project vicinity to lower groundwater levels. The dewatered groundwater resources would be converted to surface water that is discharged into existing creek channels and quickly conveyed out of the area.

Grp 21-110

As described on page 3-15 of the DEIR:

> *The Idaho-Maryland Mine would be dewatered using the Brunswick shaft to access the underground workings.*

And page 4.5-55 of the DEIR:

> *As dewatering occurs, the water level within the underground workings would decrease from its current depth of approximately 250 feet bgs down to the maximum depth of the New Brunswick shaft at about 3,460 feet bgs. These depths are equivalent to elevations of approximately 2,500 feet msl and -700 feet msl, respectively. Thus, the water level within the mine workings would eventually decrease as much as 3,200 feet due to the project. As previously discussed, the transmissivity of the fractured bedrock decreases by several orders of magnitude at deeper depths, due to a reduction in the number of*

> *fractures and a decrease in the width of the fracture openings caused by increased lithostatic pressures at depth. As a result, dewatering of deeper tunnels and drifts would have less impact on groundwater levels in the fractured bedrock than would dewatering of shallower mine workings.*

As described in the DEIR, groundwater levels within the mine would be lowered by over 3,000 feet. Under the proposed project, the mine workings would essentially act as an enormous groundwater extraction well that would be pumped continuously for generations (the requested permit term is 80 years – DEIR page 2-3).

The applicant's consultants have prepared a numerical groundwater model to attempt to predict how this proposed long term dewatering effort would affect overlying and surrounding groundwater levels where rural residences and businesses rely solely on private groundwater wells for their water supply. Per the DEIR (page 4.8-55):

> *...based on the variation in the transmissivity and hydraulic conductivity of the fractured bedrock, 99 percent of groundwater inflow would occur within 550 feet of the ground surface, as previously discussed. Based on the fractured bedrock aquifer properties and the maintenance dewatering rates, it is anticipated that the drawdown near the mine area would cause the water levels in several of the wells in the East Bennett area to be affected.*

Based on this groundwater model output, the DEIR concludes that the East Bennett wells area could be affected and that impacts in all other areas would not be significant (DEIR page 4.8-62):

> *Thus, in the perimeter areas and including a safety factor of 100 percent in calculations, the project would not have any significant impact on groundwater supplies.*

In Mitigation Measure 4.8-2(a) (DEIR page 4.8-67) the DEIR acknowledges that more groundwater level data is needed to assess the potential impacts of the project to groundwater levels. The DEIR inappropriately defers the collection of additional data (via a Groundwater Monitoring Plan) to the future.

Mitigation Measure 4.8-2(a)(4) (DEIR page 4.8-67) is internally inconsistent and not implementable as stated. The first part of the measure requires an assessment be conducted "once dewatering of the underground mine workings commences", as stated (DEIR page 4.8-67) [underline emphasis added]:

> *A projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The*

> *projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations.*

The second part of the same mitigation measure refers to determination of "baseline groundwater level", which would be based on the assessment discussed above, "shall be developed prior to the initiation of dewatering of the underground mine workings", per the DEIR (page 4.8-67) [underline emphasis added]:

> *For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings.*

It would not be possible for pre-dewatering baseline levels to be determined when they would be based on an assessment that would not start until after dewatering begins. Consequently, this Mitigation Measure 4.8-2(a) (DEIR page 4.8-67) would be impossible to implement.

The lack of clarity and implementability of the proposed approach demonstrates that the DEIR does not provide a clear and feasible methodology for protecting groundwater resources and domestic well users. A groundwater management plan that includes information gathering and data collection from a broad network of existing domestic wells (not monitoring wells - refer to additional discussion below under **Proposed Reliance on a Groundwater Monitoring Well Network**) should be implemented prior to preparation the DEIR.

CEQA does not allow the deferment of important studies that would allow full characterization of impacts and deny decision-makers information that would allow them to make well-reasoned decisions regarding the viability of the project. Groundwater monitoring networks should be established and resulting data included in the DEIR.

As described below, the approach that the DEIR takes to assessing and mitigating potential impacts to groundwater levels and existing water supply wells is flawed in numerous ways.

Uncertainty of Groundwater Model Predictions

Grp 21-111

Accurately characterizing the flow patterns and behavior of groundwater using mathematical equations (models) is a challenging endeavor in any geologic environment. The types of hydrogeologic systems that are most readily modeled accurately are uniform (homogeneous), isotropic (consistent structure from place to place) rock and or sediments, like a uniform unfractured sandstone where water flows slowly through pore spaces around the grains of the geologic material.

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Groundwater occurrence and flow within complex fractured bedrock systems, like those that occur at the project site, are exceedingly difficult to model with accuracy or reliability. It is widely known by practitioners in the hydrogeologic community that accurate prediction of groundwater behavior in fractured bedrock using groundwater models, where most of the flow occurs within the unknowable sets of primary and secondary fracture patterns, rarely occurs.

The DEIR bases its entire approach to characterizing and mitigating the impacts to groundwater resources and water levels in existing domestic wells on the results of a numerical model for a complex aquifer system with many intricacies that can never be fully understood. Even the water resources firm hired by the applicant to conduct a peer review of the mathematical model expressed concerns about the reliability of the model results:

From Wes Yost (page 12)

> *A major assumption is that flow contributions from the workings are distributed uniformly across the mining areas after correcting for depth. However, the subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. Discussion of this uncertainty and the overall uncertainty of the model predictions with respect to groundwater level impacts on individual wells should be provided.*

The DEIR does not explicitly acknowledge the concern related to the "subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty" raised by Wes Yost.

Grp 21-112

Additional uncertainties in the groundwater model are evident based on review of the groundwater model report included in Appendix K.3 of the DEIR. The groundwater model was calibrated based on pumping rates from the historical Idaho-Brunswick Mine and one water level measurement collected from the flooded (i.e., inactive) Union Hill shaft in 1956. Using only one water level measurement to calibrate a complex bedrock aquifer system over a large region introduces a significant amount of uncertainty to the model. In addition, page 6 of Appendix K.3 states "...there is a poor hydraulic connection between these two mines", which suggests the water level measurement collected from the Union Hill Shaft is not ideal for calibrating the groundwater model.

Grp 21-113

According to groundwater model report in Appendix K.3, the model was further calibrated or verified by terminating the pumps in the historical Idaho-Brunswick Mine (represented in the model by drainage nodes in the mine workings) and allowing the groundwater levels to recover from 1957 to 2019. The simulated groundwater levels at the end of the recovery period (2019) were then compared to water levels measured in eight domestic wells in the project vicinity from 1994 to 2007. As shown in Figure 4-8 from the groundwater model report (see below), the

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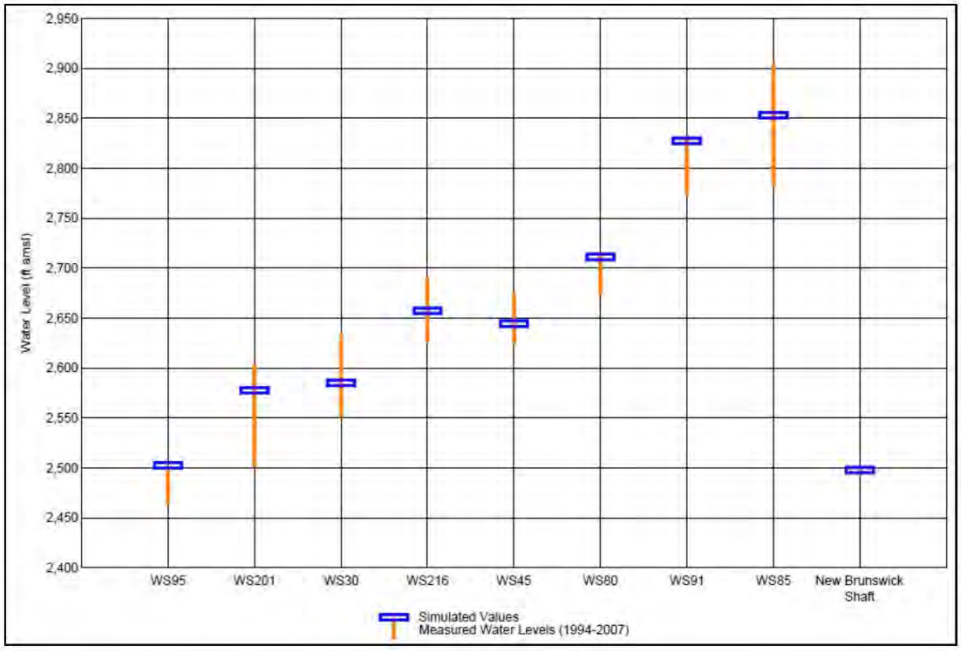
simulated water levels recovered within the range of measured water levels in the select domestic wells; however, the variation in measured water levels for each domestic well ranges from about 40 feet (well WS95) to 120 feet (well WS85). Demonstrating that the simulated groundwater levels can recover within a 40- to 120-foot range of measured water levels does not provide much assurance regarding the accuracy and reliability of the groundwater model. This is particularly true when the model is being used to predict that the project will have a maximum groundwater level drawdown of 10 feet in the project vicinity.

Figure 4-8 of Appendix K.3: Simulated Water Levels Compared to Select Domestic Wells



As summarized on page 4.8-19 of the DEIR, groundwater currently appears to be seeping into the existing mine shafts and then discharging to several drains located along Wolf Creek. As stated on page 4.8-19 of the DEIR:

Grp 21-114

> *The elevation of the water in the New Brunswick shaft averages 2,497 feet msl. This elevation is about 25 feet to 265 feet below the static water level in the domestic supply wells in the East Bennett area. Thus, the underground workings connected to the New Brunswick shaft must have a connection to a point that allows the workings to be*

drained, resulting in a lower water level in the shaft than in the wells in the surrounding bedrock.

Page 4.8-19 of the DEIR also states the following:

Because the water level in the shafts appears to be consistently below the static groundwater levels in the wells in the East Bennett area, groundwater will continually seep into the shafts. As a result, the shafts act as "wells" that constantly draw groundwater from the surrounding shallow bedrock (i.e., above a depth of 500 feet, where the transmissivity is highest).

As a result, there is currently a groundwater depression created by constant drainage from the existing mine workings. This groundwater movement is generalized in Figure 4.8-7 of the DEIR shown below. The groundwater model report in Appendix K.3 of the DEIR also simulated this existing groundwater depression. However, the groundwater model report provides no discussion of how this condition was simulated. Since the static water level in the mine workings remains at about 2,497 feet msl, the model should apply boundary conditions (e.g., drainage nodes or pumping wells) along the mine workings located above 2,497 feet msl to create the specified head of the current water level in the mine workings. There is no discussion of such a boundary condition being applied to the groundwater model to simulate the current drainage of the mine workings. Calibrating the groundwater model without incorporating the proper mechanisms to simulate the drainage of groundwater from existing mine workings could introduce substantial error to the overall modeling results.

Grp 21-115

In summary, there is a high level of uncertainty associated with the groundwater model that was used in the DEIR as justification to identify a very small subset of the domestic wells in the East Bennett area that are likely to be adversely affected by the project, and to characterize impacts to a vast number of other domestic wells in the project vicinity as less than significant. This is a flawed approach and provides no assurance that residences and businesses that rely on groundwater wells in the region will have a reliable water supply if the project were to be approved.

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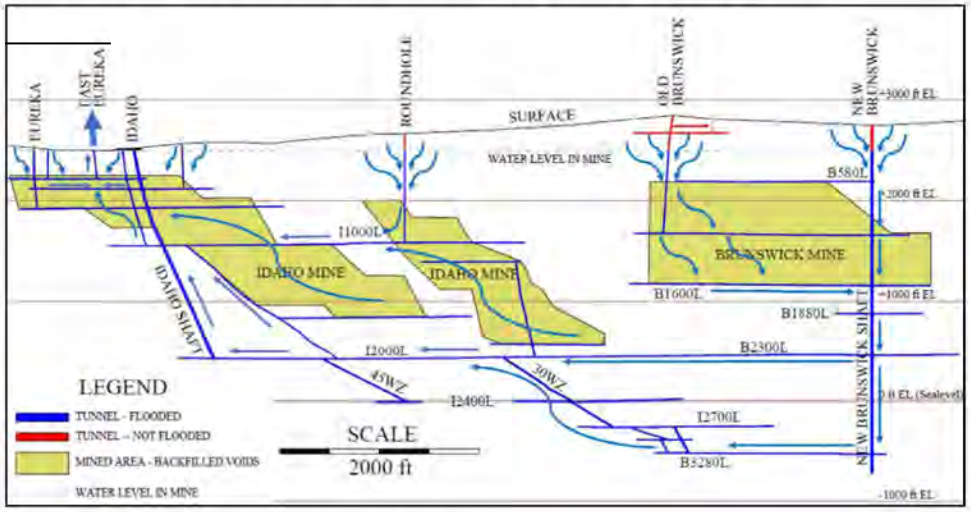
Figure 4.8-7 of DEIR: Groundwater Movement in Mine Workings (Existing Condition)



Arbitrary Impact Criteria of 10% Drawdown

Grp 21-116

DEIR Mitigation Measure 4.8-2(b) states that:

> *If, based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted…*

Grp 21-117

This mitigation measure attempts to establish this "10 percent or greater reduction of the water column of any well" as a criterion of significance which would trigger a significant impact requiring mitigation. Nowhere is the arbitrary groundwater level of 10 percent reduction justified in the DEIR. It is certainly possible that of the hundreds of supply wells in the region, that some of them are just barely satisfying the well owners needs under existing conditions, and that a water level reduction of 10 percent could lead to water levels dropping below the well pump intake, adversely impacting the quantity of water available from the well with the existing pumping system. The DEIR presents no details related to the characteristics and function of the existing domestic wells that the project may affect and allow for the development of a fact-based criterion of significance. The DEIR needs to disclose this fact and gather the data needed to make such a determination, then discuss and mitigate the impacts.

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The mitigation measure also does not describe how drawdown would be determined relative to baseline conditions. As stated on page 7 of Appendix K.3, private domestic wells in the project vicinity have seasonal fluctuations that may vary from 10 to 50 feet between wet and dry seasons. It is not clear how these seasonal water fluctuations would be distinguished from project-related drawdown.

Also, it should be noted that the General Plan policy referred to (Policy 17.12) says nothing about a 10 percent reduction criterion. Verbatim, this General Plan policy states:

> *In approving mining projects which according to expert opinion may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses, the County shall require the operator to guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water.*
>
> *Where water quantity and quality problems occur, an immediate water supply shall be provided by the operator until the source of the problem is determined. The burden of proof shall be on the operator to show that the mining operation did not create the water problem. If it is determined that the operator is at fault, impacted owners shall be compensated by the operator.*

Grp 21-118

According to the General Plan policy, the correct criterion for mitigating potential impacts to water resources from mining projects is based on expert opinion and not an unsubstantiated 10 percent reduction criterion. For the reasons stated within this letter, it is Baseline's expert opinion that the project may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses in a much wider area than is indicated in the DEIR. The DEIR criterion of impact should be revised to be consistent with General Plan policy 17.12 and Mitigation Measure 4.8-2(c) should be revised to include all wells that may be affected instead of only the 30 wells in the East Bennett area.

Proposed Reliance on a Groundwater Monitoring Well Network

The DEIR and associated Groundwater Monitoring Plan (GMP) (Itasca, Feb. 2021) does not propose to monitor water levels in the actual water supply wells at overlying and nearby residences and businesses that may be affected by the project, but proposes to install monitoring wells to (GMP page 1):

Grp 21-119

> *...provide data for assessing groundwater conditions during dewatering of mine workings and mining operation at the Project. The GMP includes the installation of monitoring wells across the Project site at 15 different locations.*

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It is not explained in the DEIR or GMP how 15 monitoring wells in complex fractured bedrock spread out over thousands of acres could possibly be relied upon to provide data to ensure that groundwater level impacts to the hundreds of existing water supply wells in the project vicinity are immediately identified and mitigated. For example, a monitoring well could be placed in proximity to an existing supply well and respond very differently to changing water levels in the mine during dewatering if a water-bearing bedrock fracture intersects one of the wells, but not the other. To comply with the requirements of General Plan Policy 17.12, the applicant should, at minimum, do the following:

- Complete a detailed water supply well inventory for all wells within the Mineral Rights Boundary (plus a substantial buffer zone);
- Investigate all available details about each well such as the construction design (i.e., depth, diameter, screened interval); type and use of the well (e.g., domestic, irrigation, industrial, etc.); water demand (installing totalizer meters if necessary to determine water use); and recharge rates (installing pressure transducers if necessary to monitor drawdown and recharge); and seasonal variations in water levels.
- Develop a plan for each well to ensure that an immediate alternate water supply can and will be provided should an impact to that well occur. This plan should include provisions to ensure alternate water supplies will be provided throughout the 80-year life of the project and beyond. For example, if the project causes a domestic well to go dry, and the well collapses or partially collapses (which older wells often do when they go dry), the applicant should be required to replace the well at no cost to the owner.

We understand that this well identification and mitigation planning will be a substantial effort and need to be funded by the applicant, but the consequences of not committing to full compliance with General Plan Policy 2.17 are dire for local property owners who rely on groundwater.

Grp 21-120

It should be noted that the County has already required a similar program for a previous mining project. Please refer to the Conditional Use Permit (File Number: U94-017) for the Extension of Time for Emperor Gold (U.S.) Corporation dated March 28, 2001 (Attachment A), in which the County required: 1) a monitoring program to establish baseline data on local wells and the collection of at least 12 months of baseline data from these wells. The proposed project should be required to at least implement as rigorous of a well protection program for the proposed project as was previously required in the use permit of a previous mining project. DEIR Mitigation Measure 4.8-2 should be revised to more fully address potential impacts to water supply wells and meet or exceed the requirements previously required by the County.

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Impacts to Groundwater Dependent Biological Resources Not Adequately Characterized and Mitigated

For similar reasons as described above for potential impacts to water supply wells, proposed mine dewatering activities could, and likely will, have a significant impact on groundwater dependent biological resources by drying up springs and reducing or eliminating groundwater discharges to certain creek segments. This is not addressed at all in section 4.8 of the DEIR. The applicant's own consultant identifies this problem (West Yost, page 18):

> *Baseflow in the South Fork of Wolf Creek and Wolf Creek is from bedrock fractures. The reported hydrogeologic conceptual model for groundwater flow acknowledges this, but the numerical model necessarily assumes a relatively uniform distribution of hydraulic properties in the subsurface. The subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. Discussion of this uncertainty and its impact on the model's predicted impacts of mine dewatering on stream flow should be provided.*
>
> *Based on the data and analysis presented in the Itasca Report and EMKO Report, it is possible that mining activities, including blasting, backfilling with CPB, and sealing of drains or areas of the underground workings, could activate leaching and groundwater flow in new subsurface areas, potentially resulting in impacts to neighboring wells, and discharges to surface water of groundwater with water quality exceeding applicable standards. These impacts could potentially occur during the mining or post-mining periods. Because of the uncertainty inherent in the bedrock fracture flow system, monitoring will be needed, as mining activities progress, to assess potential impacts, design appropriate solutions and attain necessary permits to mitigate these potential impacts. These efforts should be addressed in the monitoring and mitigation requirements for the mining and post-mining phases of the Proposed Project.*

Grp 21-121

This potential impact needs to be fully addressed and mitigated.

DEIR SECTION 4.3 AIR QUALITY, GREENHOUSE GAS EMISSIONS, AND ENERGY

Underestimated Emissions of Criteria Air Pollutants and GHGs from Haul Trucks Transporting Engineered Fill

Grp 21-122

The air quality analysis for the DEIR assumed that waste rock and mine tailings would be used as engineered fill at the following locations over time:

- Years 2022–2026: Fill placement at the Centennial Industrial Site;
- Years 2027–2032: Fill placement at the Brunswick Industrial Site; and
- Years 2033–2102: Fill placement at off-site locations.

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The DEIR estimated the annual average emissions of criteria air pollutants and greenhouse gases (GHGs) for the haul trucks that would transport engineered fill from the Brunswick Industrial Site to the Centennial Industrial Site (1.8 miles per trip) from 2022 to 2026 and then to off-site locations (60 miles per trip) starting in 2033. The DEIR analysis assumed that remediation of the Centennial Industrial Site would be completed and approved by the DTSC prior to the opening year. However, since remediation of the Centennial Industrial Site is not included as part of the CEQA analysis for the project, there is no assurance that remediation of the site will be completed prior to the opening year of the project or within the lifetime of the project. As a result, it's speculative to assume that the Centennial Industrial Site will be available for fill placement.

A more reasonable analysis is to assume the Centennial Industrial Site is not available for fill placement and the haul trucks will need to travel to the more distant off-site locations for an additional five years starting as early as the opening year. Since the fleetwide air pollutant emissions from haul trucks are expected to improve over time as older equipment is replaced with newer technology (e.g., cleaner engines), estimating haul truck emissions to off-site locations in the opening year also provides the most conservative analysis. To illustrate the severity of impacts that could result under this assumption, Baseline prepared an updated analysis of the project's daily nitrogen oxide (NOx) emissions in the opening year related to haul trucks transporting engineered fill to the off-site locations.

As shown in **Table 1**, the project's daily NOx emissions for haul trucks transporting engineered fill to off-site locations (89.6 pounds per day [lbs/day]) would be substantially higher than the results of the DEIR analysis of haul trucks transporting engineered fill to the nearby Centennial Industrial Site (4.0 pounds per day [lbs/day]). The updated analysis would result in the project's total NOx emissions (193.1 lbs/day) exceeding the Northern Sierra Air Quality Management District's (NSAQMD's) Level C threshold of significance (136 lbs/day) in the opening year, which would result in a significant and unavoidable impact if emissions are not mitigated below the NSAQMD's Level C threshold.

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Table 1: Comparison of NOx Emissions for Haul Truck Transporting Engineered Fill to the Centennial Industrial Site and Off-Site Locations in the Opening Year (2022)

Haul Truck Destination in Opening Year (2022)	Haul Truck Annual VMT	NOx Emissions (lbs/day)		
		Haul Truck Emissions[1]	Total Project Emissions[2]	NSAQMD Threshold Level
Existing Analysis for Centennial Industrial Site	65,700	4.0	107.5	Level B (24-136 lb/day)
Updated Analysis for Off-Site Locations	2,190,000	89.6	193.1	Level C (>136 lb/day)

Notes: VMT = vehicle miles traveled; NSAQMD = Northern Sierra Air Quality Management District
[1] Haul truck emissions were estimated based on the annual VMT, trips, idling, and emissions factors reported for Haul Trucks in Appendix E.1 of the DEIR.
[2] Total project emissions were estimated based on the unmitigated NOx emissions from other project sources summarized in Table 4.3-17 of the DEIR.

Emissions of other criteria air pollutants and GHGs would also similarly increase if the Centennial Site is not available for fill placement. The project analysis for criteria air pollutants and GHGs should be updated to assume that remediation of the Centennial Industrial Site may not be completed within the lifetime of the project and, therefore, off-site locations may be needed for fill placement for an additional five years starting as early as the opening year. As demonstrated in Baseline's updated analysis of daily NOx emissions, this is expected to result in more severe air quality and GHG impacts than disclosed in the DEIR.

Failure to Evaluate the Effectiveness of Applicant Proposed Measures to Reduce Air Quality, GHG, and Energy Impacts

Grp 21-123

As described on page 4.3-65 of the DEIR, the following three applicant proposed measures (APMs) will be implemented during construction, operation, and reclamation of the project:

- APM-AQ-1: Exhaust Emission Controls
- APM-AQ-2: Surface Fugitive Dust Controls
- APM-AQ-3: ASUR Plan

Similar to mitigation measures, these APMs are intended to reduce the project's air quality, GHG, and energy impacts. The DEIR included the APMs in the project's unmitigated analysis of air quality, GHG, and energy impacts. It appears that the preparers of the DEIR intended to incorporate the APMs into the project design; however, the APMs were not identified as features in the project description. Therefore, there is no assurance that these APMs will be implemented as a part of the project.

Based on the *Lotus v. Department of Transportation* (223 Cal. App.4th 645) decision, the DEIR should first evaluate if the project's air quality, GHG, and energy impacts would exceed the

thresholds of significance without implementation of the APMs, and then evaluate how the APMs would reduce the impacts to or maintain them at a less-than-significant level. Furthermore, the APMs need to be analyzed for their effectiveness in reducing the impact and a mitigation monitoring or reporting plan needs to be adopted to ensure these measures are implemented.

The DEIR should be updated to properly incorporate of APMs into the project design or convert the APMs into CEQA mitigation measures and include them in the Mitigation Monitoring and Reporting Program. More importantly, the DEIR analysis of unmitigated air quality, GHG, and energy impacts should be updated to evaluate the effectiveness of the APMs in reducing impacts to a less-than-significant level.

Inadequate Mitigation of Criteria Air Pollutant Emissions

Grp 21-124

According to Table 4.3-17 in the DEIR, the project's unmitigated emissions of NOx would exceed the NSAQMD's Level B threshold during the 1-year period of construction and over the entire 80-year period of the mining permit, while unmitigated emissions of reactive organic gases (ROG) and respirable particulate matter (PM10) would exceed NSAQMD's Level A threshold during that period. Therefore, the project would have a potentially significant air quality impact that should be mitigated to reduce emissions from both short-term and long-term sources. The DEIR analysis has incorporated the minimum mitigation measures recommended by the NSAQMD; however, these mitigation measures only reduce project emissions during the 1-year period of construction. The mitigation measures do not address any of the long-term NOx, ROG, and PM10 emissions over the 80-year permit of the project. As result, there is no evidence that the project's long-term NOx, ROG, and PM10 emissions have been mitigated to a less-than-significant level. The DEIR analysis should be updated to identify and evaluate feasible mitigation measures that would reduce long-term criteria air pollutant emissions from project operations, not just construction.

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Health Risk Assessment Fails to Provide Essential Information and Lacks Substantial Evidence to Support Conclusions

The DEIR prepared a health risk assessment (HRA) for nearby sensitive receptors exposed to concentrations of toxic air contaminants (TACs) generated by the project. TACs of concern include diesel particulate matter (DPM), asbestos, silica, and trace heavy metals, as described on page 4.3-79 of the DEIR:

> *Project construction, operations, and reclamation activities would produce DPM emissions (with PM10 exhaust modeled as surrogate) due to off-road equipment and haul truck trips, and other TAC emissions from mining and soil movement. The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos, silica, and trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. In addition, for purposes of the HRA, diesel emergency generators were assumed to operate for up to 100 hours per year in accordance with CARB's ATCM for Stationary Compression Ignition Engines.*

Grp 21-125

The methodology and input parameters used for the HRA are documented in the *Health Risk Assessment for The Idaho-Maryland Mine Project* included in Appendix E.1 of the DEIR. The HRA included air dispersion modeling of 25 unique sources of TAC emissions during construction and operation of the project, such as ore processing exhaust fans, diesel generators, diesel storage tanks, and fugitive dust from off-road equipment. Based on the air dispersion model results, the HRA estimated the health risks for a sensitive receptor exposed to 33 different TACs of concern, such as DPM, asbestos, and silica. Consistent with guidance from the Office of Environmental Health Hazard Assessment (OEHHA), the sensitive receptor exposure was assumed to begin in the 3rd trimester of pregnancy for a duration of 30 years.

The estimated unmitigated cancer risk at the maximally exposed individual resident was reported to be 10.4 in a million, which is above the threshold of significance (10.0 in a million). With implementation of higher-tier engines during construction, as required by Mitigation Measure 4.3-1(b), the DEIR estimated that the project would result in an incremental cancer risk of 7.6 in one million. This 27 percent reduction in cancer risk is surprising, because Mitigation Measure 4.3-1(b) only reduces emissions during 1 year of construction and does not reduce any of the emission sources over the 80 years of operation. However, there is no way to review the validity of the HRA results and effectiveness of Mitigation Measure 4.3-1(b) because the results of the HRA analysis are poorly documented and non-existent in most cases.

Grp 21-126

For the HRA results, the DEIR only presents the total cancer risk, chronic health risk, and acute health risk for a sensitive receptor exposed to 33 different TACs from 25 different sources at different times over a 30-year period. The individual health-risk contributions from each

emission source, TAC, and year of exposure are not documented or summarized anywhere in the DEIR. In addition, no graphics are provided to show the location of the modeled emission sources, sensitive receptors, and results of the air dispersion modeling. As a result, there is no reasonable method for the public or decision makers to review the validity of the HRA findings and evaluate the effectiveness of proposed Mitigation Measure 4.3-1(b). According to *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 442, the data in an EIR must be presented in a manner to adequately inform the public and decision makers. Here, the DEIR air quality analysis lacks substantial evidence to support its conclusions and should be revised to properly document and summarize the findings of the HRA.

Unsubstantiated GHG Threshold of Significance

Neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project. Therefore, the DEIR uses a bright-line GHG threshold of 10,000 metric tons of carbon dioxide equivalents (MT CO2e) per year for operations based on the following justification described on page 4.3-43 of the DEIR:

Grp 21-127

> *For operations, because the project is an industrial project that includes stationary sources (i.e., diesel generators used for emergency power), the project's GHG emissions were compared to the 10,000 MT CO2e per year quantitative threshold, which, as described above, is used by SMAQMD, PCAPCD, BAAQMD, and SCAQMD for industrial and/or stationary source emissions of GHGs. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 MT CO2e per year threshold in numerous CEQA documents where those air districts are the lead agency.*

The justifications for adopting this threshold are unique to each air district. These air districts have prepared detailed GHG inventories to identify and evaluate strategies for achieving the statewide GHG reduction goals within their air district. While these air districts have adopted the same bright-line threshold of 10,000 MT CO2e per year for stationary sources, the justification for adopting this threshold is not the same for each air district. Furthermore, these air districts originally adopted the stationary GHG threshold to achieve the 2020 statewide GHG goal under California Assembly Bill 32, which was to reduce GHG emissions to 1990 levels by the year 2020. In September 2016, Senate Bill 32 established the State target to reduce GHG emissions 40 percent below 1990 levels by 2030. The Bay Area Air Quality Management District (BAAQMD), which is referenced above, is in the process of updating their GHG thresholds to address California's long-term GHG goals for 2030 and beyond, and is proposing a new stationary source threshold of 2,000 MT CO2e per year or compliance with Cap-and-Trade.[1]

[1] Bay Area Air Quality Management District (BAAQMD), Air District Update to CEQA Thresholds of Significance for Greenhouse Gases; Public Workshop. December 9, 2021.

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The DEIR does not discuss the justification provided by each air district for adopting the 10,000 MT CO2e per year threshold, nor does it provide substantial evidence for applying this threshold to the project to demonstrate how it will achieve a fair share of the statewide GHG reductions goals for 2030 and beyond. The DEIR should be updated to identify and provide justification for a GHG threshold of significance that will achieve the statewide GHG reductions goals for 2030 and beyond over the proposed 80-year lifetime of the mining permit.

CONCLUSIONS

Grp 21-128 Based on our review of the DEIR and supporting appendices for the proposed project, Baseline recommends that the County revise and recirculate the environmental analysis to address the environmental concerns related to the issues described above.

Sincerely,

Patrick Sutton, PE
Senior Environmental Engineer

Bruce Abelli-Amen, PG, CHg
Principal

PS:BAA:km

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ATTACHMENT A

Conditional Use Permit (File Number: U94-017)
for the Extension of Time for Emperor Gold (U.S.) Corporation

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PLANNING DEPARTMENT	ENVIRONMENTAL HEALTH	BUILDING DEPARTMENT	CODE COMPLIANCE
PHONE (530) 265-1440	PHONE (530) 265-1452	PHONE (530) 265-1444	PHONE (530) 265-1362
FAX (530) 265-1798	FAX (530) 265-7056	FAX (530) 265-1272	FAX (530) 265-1625

March 28, 2001

Scott A. Galati
Grattan & Galati
801 "K" Street, Penthouse Suite
Sacramento, CA 95814

RE: Extension of Time for Emperor Gold (U.S.) Corporation – Conditional Use Permit File Number: U94-017

Dear Mr. Galati:

At their regular meeting of March 22, 2001, the Nevada County Planning Commission considered your extension request dated December 13, 2000, for an extension of time for the Conditional Use Permit application of Emperor Gold, File Number U94-017.

The Commission, by a 5-0 vote, granted the extension of time for two (2) years. The dewatering activities for the Conditional Use Permit on this project must be commenced no later than January 25, 2003 .

If you have any questions, please contact the project planner, Tod Herman, Associate Planner, at (530) 265-1257.

Very truly yours,

NEVADA COUNTY PLANNING COMMISSION
Mark Tomich, Ex-Officio Secretary

By: Jean Jacobs
JEAN JACOBS
Clerk to the Planning Commission

MT:jj

COUNTY OF NEVADA

PLANNING DEPARTMENT

Eric Rood Adm. Bldg.
950 Maidu Avenue
Nevada City, CA 95959-8617
(916) 265-1440
Fax (916) 265-1798

January 26, 1996

NOTICE OF CONDITIONAL APPROVAL
USE PERMIT APPLICATION

Emperor Gold (U.S.) Corporation
P. O. Box 1836
Grass Valley, CA 95945

U94-017; EIR94-003
AP#: 06-441-03, -04, -05, & -29;
09-630-24, -27, -30 & -31

ENVIRONMENTAL ACTION: Certified EIR

You are hereby notified that the Nevada County Planning Commission, at a regular meeting held on January 25, 1996, after public hearing, did duly consider your application for the dewatering of the existing underground workings of the Idaho Maryland Gold Mine, and the subsequent underground exploration and sampling of those workings, on property located on 117 acres of contiguous property located southwest of the intersection of Brunswick Road and E. Bennett Road, including the Bohemia Mill site. A legal description of the property is on file in the Planning Department, 950 Maidu Avenue, Nevada City, California.

The Planning Commission hereby notifies you that your application for a use permit was granted, on a 4-0 vote, subject to the following mitigation measures and conditions:

The agency references are: Planning Department (PD), Department of Transportation (DOT), Environmental Health (EH), Building Department (BD), and the Northern Sierra Air Quality Management District (NSAQ).

I. GENERAL CONDITIONS

PD 1 All operations shall be conducted in accordance with the project description in Section 3.0 (Draft EIR), and as amended in the EIR Errata (Section 3.0 of the Final EIR). All other conditions required by this permit shall be considered as modifications to the project description. All mitigation measures attached to this project shall also be considered as conditions of this permit.

PD 2 Under applicable law, this use permit will "run with the land" and the entitlements and obligations will be fully assumed by any subsequent owner of the property covered by this use permit. Any party or entity acquiring the property and electing to continue with the use of the property as authorized by this use permit will be required to fully comply with all of the conditions and obligations created by the use permit, including, but not limited to, being required to post and maintain adequate security as required under MM 4.3.6 of this permit.

PD 3 Once the dewatering portion of the Exploration Phase has commenced, the operator shall have four and a half years to complete the Exploration Phase and an additional six months to complete the site clean up activities outlined in the Post Project phase (Section VIII) of this use permit. All mine dewatering shall cease at the end of the Exploration Phase (Section VII).

PD 4 Every two years, beginning from the commencement of the Site Preparation Phase, this Use Permit shall be reviewed before the Nevada County Planning Commission. The purpose of the review will be to evaluate the success of the established performance standards and of the operator in complying with these Conditions of Approval. Additionally, the review will monitor the status of the project and any deviations from the anticipated impacts described in the Final EIR. Adjustments to the monitoring program may be made in order to accommodate any such deviations.

PD 5 If the review hearings in Condition PD 4 above reveal serious violations and/or unexpected significant environmental or public health impacts that either have not or cannot be corrected, the Planning Commission shall recommend that the Board of Supervisors hold a hearing to consider revocation of the Use Permit.

NOTE: Notwithstanding any other provision, use permit revocation hearing(s) may be held any time by the Board of Supervisors pursuant to Section L-II 31.6 of the Land Use and Development Code whenever non-compliance on the part of the operator is demonstrated such that the established conditions of approval are not being followed.

PD 6 These conditions may not be changed without amending this permit except that minor adjustments to the project and conditions may be made if approved by the Planning Department staff, and if such changes do not result in a major departure from the approval either individually or cumulatively as defined in Section L-II 3.49 of the Land Use and Development Code. Staff will report all such adjustments to the Planning Commission and Community Liaison when applicable.

PD 7 The operator shall fund the County's monitoring and inspection for this project. All such fees shall be based on an at-cost basis pursuant to Section K.1 of the latest fee schedule adopted by the Board of Supervisors.

PD 8 The following is the definition of the Community Liaison with whom the Mine Operator shall be required to coordinate:

a. At their election, and on an "as available" basis, the Bohemia Area Residents Committee (BARC) will provide the operation with the name, address, and phone number of a person designated as the "Community Liaison." This volunteer will serve both the community near the mine and the operator as the main line of communication between the two. For example, the liaison may:

   i. Pass on BARC or community member's concerns in an orderly fashion.
   ii. Stay informed about the project and notify BARC or community members of the current stage of the project including, as examples, temporary noisy events or the status of the monitoring results.



iii. Review monitoring data on file at the County as necessary.
iv. Serve on the Review Team for various contracts administered by or requiring review by the County.

b. The liaison will be notified concurrently with the County of any changes to the operation requiring County approval.

c. The operator shall allow the Community Liaison (when accompanied by County staff) to review on-site monitoring procedures and related activities. These on-site visits however, will be subject to conditions of the operator's liability or product loss insurance carriers and the necessary safety training of the liaison.

d. Periodic "Review Team" meetings with the County, the Community Liaison, and the operator shall be held to discuss the project's status. These meetings shall occur at a minimum on a quarterly basis, but may also be held on a more-frequent "as-needed basis." If deemed desirable by the "Review Team," the County will provide notice (at the operator's expense) to area residents of project events, status, etc. which may be of interest to such persons.

II. SUBSEQUENT PERMIT ACQUISITION

EH 1 Valid Hazardous Waste Permits are required prior to remedial action or hazardous waste operations. If necessary, obtain a Hazardous Waste Permit from the Nevada County Department of Environmental Health prior to the start of operations.

EH 2 A Hazardous Material Storage Permit is required prior to installing any hazardous material on site which equals or exceeds 55 gallons, 500 pounds, or 200 cubic feet of compressed gas. Obtain a valid permit(s) from the Nevada County Department of Environmental Health prior to the start of operations.

EH 3 Bulk storage of hazardous materials, hazardous substances, hazardous wastes and/or fuels require the submittal of a Hazardous Materials Release Response Plan and Inventory (HMRRP&I) pursuant to California Health and Safety Code Chapter 6.95. Operator shall submit a HMRRP&I to the Nevada County Department of Environmental Health 30 days prior to the start of operations at this site.

NSAQ 1 Obtain an Authority to Construct and Permit to Operate from the Northern Sierra Air Quality Management District prior to constructing anything that requires such a permit.

MM 4.4.2 The water quality and quantity parameters associated with surface discharge resulting from the proposed project shall conform to Order No. 94-005 (for quality) and any other waste discharge requirements and standards as set forth by the California Regional Water Quality Control Board, Central Valley Region. The operator shall submit any required background documentation to CRWQCB to obtain these permits, and these permits shall be in place before dewatering commences. The operator shall also submit to the Nevada Irrigation District any discharge plans or proposals which may affect NID facilities. NID shall be treated as an affected or reviewing agency.

MM 4.4.5 As supporting documentation to assess receiving water quality, the operator shall conduct additional upstream and downstream testing within the South Fork channel, as required by the CRWQCB.

MM 4.4.6 The operator shall conduct a discharge Monitoring and Reporting Program during dewatering, as set forth by the CRWQCB. Such monitoring will include testing for metals as well as pH levels.

III. ON-SITE PREPARATION

PD 9 During the On-Site Preparation Phase, the operator may conduct the following site preparation activities:

a. Do the necessary geotechnical work for the dewatering pond.

b. Installation of the on-site power lines.

c. Develop the internal road system.

d. Begin preliminary site clearing and development of the on-site buildings and structures.

Prior to the establishment of any of these activities, the operator shall demonstrate by documentation that all appropriate mitigation monitoring has been performed. All such activities must comply with the other applicable requirements of this permit and those of the other permit issuing agencies.

PD 10 The activities in Condition PD 9 above shall be conducted in the following manner:

a. All surface activities (PD 9 above) shall comply with those noise standards established in Policy 9.1 of the Noise Chapter of the Nevada County General Plan and shall be conducted in accordance with Mitigation Measures 4.9.2, and 4.9.3.

b. All required permits from the CRWQCB, or waivers therefrom, shall be obtained prior to the dewatering.

PD 11 Site plan standards shall be as follows:

a. Administration Office Parking: A minimum of 12 parking stalls (including Disabled parking) shall be provided in accordance with Article 28 of the Land Use and Development Code. Parking area shall be paved to control fugitive dust.

b. Shop Area Parking: A minimum of 30 parking stalls shall be provided in accordance with Article 28 of the LUDC. Parking area shall be paved to control fugitive dust.

c. Buildings: All permanent building shall be colored to blend with their respective background settings.

d. Lighting: All exterior lighting shall be shielded and directed down to prevent direct off-site light spill. Permanent exterior lighting shall be limited to the Administration Office Area, Shop Area, Watchman's Quarters, and those areas reasonably necessary to provide safety measures during nighttime operations. Within an hour after the evening's activities, all unnecessary exterior lighting shall be turned off.

e. Site Plan: After buildings are permanently located, a revised site plan shall be submitted to the Planning Department and kept on file.

f. Watchman's Quarters: A watchman's quarters shall be permitted for the purposes of mine security.

BD 1 Obtain the proper permits from the Building Inspection Department for all building construction and grading activities. Such permits shall meet the minimum requirements of the Uniform Building Code and Chapter XV of the Nevada County Land Use and Development Code (Grading Ordinance).

DOT 1 Provide proof of access rights to Brunswick Road through the S.P.I. property. (Note that the "Concept Plan" as submitted with the rezoning application, Z93-004, depicts a redesigned interior road system for the S.P.I. property.)

DOT 2 The Road Improvement Fee in accordance with Nevada County Ordinance No. 1829 creating and establishing the authority for imposing and charging a road improvement fee within the unincorporated territory of Nevada County, will be levied for this development and will be based on the latest fee schedule adopted by the Board of Supervisors. (Note: Class of Use = 5; Zone = 5)

EH 4 Sewage disposal from any facility on the project site shall be in compliance with Nevada County Land Use and Development Code, Chapter X, and any subsequent revisions or amendments pertaining to the disposal of sewage in Nevada County.

MM 4.2.1 Prior to the construction of water treatment improvements to the treatment pond, the operator shall conduct a geotechnical evaluation of the pond and earthen dam structure. This evaluation should include (but not be limited to) the following:

Testing using the hollow stem-auger drilling method to bore test holes through the containment dam and into underlying materials.

A slope stability study of the containment structure based upon an evaluation of the drilled soil samples, their condition, and encountered ground water conditions within the earthen structure;

A determination of the dam's existing factor of safety under normal conditions and during a seismic event.

Recommendations for remedial measures, if necessary, to ensure the stability and integrity of the structure for the life of the project. Such measures, if found to be necessary, may include re-compaction, stabilization with additional engineered material, or excavation and caulking of the existing structure. Necessary remedial measures shall be completed concurrent with construction of treatment facilities.



MM 4.2.2 Commensurate with site grading and improvement activities, the following measures shall be taken to help prevent the loss of soil within the construction area around the shaft:

Regular spraying of water on exposed soils during the dry season from a hose or water truck to prevent the generation of dust.

Construct a brow ditch above (up-gradient) from the construction area to divert the overland flow of rainfall around construction activities.

Place straw bails below the construction site (down-gradient) to help prevent discharge of muddy runoff.

MM 4.5.1 Prior to approval of a building permit for on-site improvements, the operator shall obtain from NID any necessary permits, approvals, will-serve letters, or agreements required for the extension of treated water to areas of the site not currently served.

MM 4.5.2 Prior to the issuance of building permits for on-site structures, the operator shall submit detailed wastewater treatment plans to the County of Nevada Department of Environmental Health for review and approval. Prior to finalizing plans, operator shall work with the Department to determine site-specific soil/percolation conditions and optimum facility locations. All wastewater disposal permitting will be conducted through the Department of Environmental Health.

MM 4.5.3 The operator shall coordinate with PG&E staff to assess the technical requirements for utilizing existing primary lines. This process, although at the operator's discretion, should begin immediately considering that all electrical equipment must be in place prior to dewatering. Operator will incur the costs of connections and other equipment, such as on-site transformers.

MM 4.5.5 Concurrent with site preparation activities, all access and service roads shall be made available for use by all emergency response units, including fire suppression, medical aid, and law enforcement.

MM 4.5.6 Concurrent with site preparation activities, the operator shall provide signage that will make all project entries and on-site buildings easily identifiable by emergency service providers.

MM 4.5.9 Prior to approval of grading permits for site improvements, the operator shall designate an area of the project site to be used as a helispot (for use in medical emergencies only) for County review and approval. This area shall be cleared and void of all vegetation and loose gravel materials.

MM 4.6.1 Concurrent with final site plans for the project, the underground powder magazine shall be located in accordance with the American Table of Distance for Storage of Explosives. All use and transport of explosives will conform to applicable federal, State and local regulations, requirements, and specifications.

MM 4.6.2 Concurrent with project operations, all activities relative to site preparation, dewatering, shaft rehabilitation and mineral exploration shall be conducted in conformance with MSHA and CALOSHA regulations.



MM 4.6.4 Prior to commencement of dewatering, the operator shall establish a bond for the removal and disposal of the precipitate sludge.

NOTE: At the completion of the dewatering and exploration phase, the operator shall contract for this task if necessary. The material (if determined to be hazardous via MM 4.6.5) shall be removed and transported by a certified hazardous materials hauler and disposed of in a pre-approved facility licensed by the State.

MM 4.8.1 During site construction, the operator shall utilize the following dust control measures:

Water sprays to control dust during demolition, loading and unloading activities;

Suspend dust-producing activities during periods of high winds when dust control measures are unable to avoid visible dust plumes;

During the dry season (May-October) provide equipment and staffing for watering of unpaved haul roads, areas being graded and equipment/vehicle parking areas at least twice daily;

Daily removal of mud and dirt carried out from the site to adjacent paved roads;

Limit the speed of equipment and vehicles to 15 miles per hour while traveling on unpaved surfaces on the site; and

Earthen or other materials which may become entrained in ambient air will be sprayed or tarped as necessary to prevent fugitive emissions while in transport to or from the site.

MM 4.8.2 Concurrent with site construction operations, parking areas and access roads on-site shall be paved, graveled or treated with a dust palliative to control fugitive dust.

✓**MM 4.9.1** Unless weather conditions (which may result in an impact upon the public health or safety) require early morning or late night construction activities, the operator shall limit site surface construction activities to daytime hours, Monday through Friday (7 a.m. to 6 p.m.).

✓**MM 4.9.2** During initial site construction (and throughout the life of the project), the operator shall ensure that all equipment utilizing internal combustion engines shall be properly maintained and fitted with mufflers in accordance with the manufacturers recommendations.

MM 4.10.1 Prior to the construction of any outfall facilities within the stream banks of South Fork Wolf Creek, the operator shall obtain an Army Corps permit under Section 404 of the Clean Water Act as required. The operator will be required to submit all information required for such a permit, and shall be subject to all mitigation requirements set forth by the Corps.

MM 4.10.2 Prior to the construction of any outfall facilities within the stream banks of South Fork Wolf Creek, the operator shall obtain a Streambed Alteration Agreement under Sections 1600-1603 of the California Fish a and Game Code. The operator will be required to submit all information needed for such a permit, and shall be subject to all conditions (if any) set forth by the Department of Fish and Game (DFG).

MM 4.11.1 Concurrent with final site planning and site improvement activities, disturbance to the Union Hill Mine, prospects landscape area and narrow gauge railroad bed shall be avoided by design and left intact. If, by change in design or plan, it is determined that the project will affect one or more of these sites, a qualified historical archaeologist shall be required to reevaluate the sites(s), determine the effect(s), and suggest appropriate measures to mitigate the impacts identified.

MM 4.11.2 Should cultural or historic resources be uncovered in the course of grading operations, all work in the immediate vicinity of the uncovered material shall be halted until a qualified archaeologist can evaluate the finds and propose suitable recommendations for further action.

MM 4.11.3 Should human remains be discovered, work must stop immediately and the county coroner must be contacted, as required by State law. If the remains are Native American, then the coroner will notify the Native American Heritage Commission.

MM 4.11.4 Should historic mining artifacts be encountered and recovered concurrent with dewatering and exploration activities, such artifacts will undergo an evaluation to determine the material's significance. Such an evaluation will be conducted by a qualified archaeologist.

MM 4.12.1 Concurrent with project implementation, the operator will use the minimum number of light sources and minimum wattage necessary to provide a safe working environment and security at the site. All building permits shall note the locations of the exterior light sources.

MM 4.12.2 Concurrent with project implementation, the operator shall ensure that light sources will be mounted at the lowest feasible height in order to minimize the line of sight from surrounding properties.

MM 4.12.3 Concurrent with project implementation, the operator shall locate and shield light sources so as to minimize the spill of light into unwanted areas. The operator shall utilize cut-off lenses, baffles or other methods to control the focus of the light sources, specifically protecting the adjacent residential areas.

IV. OFF-SITE PREPARATION

MM 4.4.1 Prior to dewatering, the operator shall conduct an engineering study to quantify the ultimate volume capacities of downstream public and private drainage facilities. Once facility capacities are known and quantified, the operator shall:

Reduce or cease outflow into South Fork Wolf Creek during storm events to the point where the combined natural flow and discharge flow do not exceed 75% capacity of downstream drainage facilities (75% of capacity allows for a storm buffer, so that the creekshed can "bleed", or drain after discharge is throttled back). This option will require accurate monitoring of downstream volumes in order to make appropriate outflow adjustments. Monitoring of storm events will require measuring precipitation with a rain gauge to determine the amount of precipitation entering the drainage basin, monitoring water volume at several downstream locations, and visually monitoring for stream bank erosion along the length of the South Fork below the project site. Monitoring of volume will occur hourly once facility capacities reach 50%. The operator shall be responsible for parcel-specific erosion damage, if such damage is shown by the third-party consultant that mine discharge was responsible.

DOT 3 A copy of the comprehensive hydrological analysis (required in MM 4.4.1 above) shall be submitted to the Nevada County Department of Transportation upon completion of the study. A fee based on the latest adopted hourly rate will be charged for the actual time spent reviewing the analysis.

V. PRE-DEWATERING WATER SUPPLY

Monitoring Program, and Property Notices

MM 4.3.1 As mitigation for the potential well impacts, the project will require a monitoring program to establish baseline data on local wells. As the first step in this process, the operator (or consultant acceptable to the County) shall locate and collect survey data for any remaining wells within the identified study area which have not yet been logged and assigned a risk category. To identify such wells and their owners, the operator shall send a notification letter/questionnaire to the owner of each parcel within the study area to ensure 100% coverage. This notification letter/questionnaire will serve to accomplish the following:

a) To identify any new or previously unknown wells within the study area;

b) To inform property owners (with and without wells) as to the purpose of the data collection, and that the data may later be used to determine if a well is impacted;

c) To provide an informational update to well owners currently participating in the operator-sponsored well monitoring program;

d) To request permission from un-categorized well owners to allow the operator or County-approved professional to collect specific well data needed to determine the well's risk group;

e) To solicit well owner participation in the 12-month baseline monitoring program;

f) To inform well owners that specific well characteristics and monitoring data is very helpful for early identification of impacts .

MM 4.3.2 Based upon the authorizations received and additional well data collected, any new data shall be applied to the County's model of risk assessment and a risk category determined for that well. Once a risk category is determined and monitoring is allowed by a well owner, that well will be considered "in the monitoring program".

MM 4.3.3 At least 12 months prior to the commencement of dewatering, the operator shall be responsible for establishing and implementing a ground water monitoring program which shall be approved by the County targeted for all wells within the study area. This 12 month period will establish baseline well data for the four seasons of the year. The monitoring effort shall be conducted by a qualified professional acceptable to the County, and will consist of the following:

a) Baseline monitoring of all identified wells will occur monthly, and will consist of measuring the static water level of each well. The 12 month monitoring time line will begin only after the notification letter/questionnaire has been sent and personal contact with the owners of all the high and moderate risk wells has been made or attempted by the operator, as described below. After or during this initial contact with well owners, an initial monitoring date and regular monitoring schedule will be established. This first monitoring date will establish the beginning of the 12 month time line for baseline data collection. Well data previously collected by the operator may be considered for inclusion into the baseline data.

b) Prior to the first monitoring date described above, the operator shall conduct follow-up contact efforts, either in person or by telephone, to each well owner to further ensure that each owner has been given ample opportunity to participate in the monitoring program. Property owners shall be provided the results of all monitoring in a timely fashion with direction to review the results to insure that they coincide with the property owner's experience. In the event of any disagreement, the operator shall be required to retest the well.

c) In order assess the rate of owner participation, the operator shall report back to the County prior to this first monitoring date, to evaluate the effectiveness of the letter/questionnaire and follow-up contact efforts. A qualified professional acceptable to the County shall be consulted (if necessary) to determine that the rate of well owner participation is sufficient to establish baseline data.

d) A second follow-up contact effort shall be conducted for the remaining wells within the Western Study Group. This follow-up effort is intended to maximize participation in the monitoring program. Any new participants from the Western Study Group resulting from this follow-up effort shall be identified and shall begin participating in the program by the second monthly monitoring date. The rate of well owner participation will also be reported to a qualified professional acceptable to the County to determine that the rate of owner participation within the Western Study Group is sufficient for establishing baseline data.

e) A third follow-up contact effort shall be conducted for the remaining wells within the entire Study Area. This follow-up effort is intended to maximize total participation in the monitoring program. Any new participants within the Study Area resulting from this follow-up shall be identified and shall be included in the program by the third monthly monitoring date. The rate of well owner participation will also be reported to a qualified professional acceptable to the County to determine that the rate of participation within the remaining areas is sufficient for establishing baseline data.

Third Party Consultant

MM 4.3.8 Prior to the commencement of the dewatering process, a qualified third party consultant selected mutually by the County, the Community Liaison, and the operator, shall be retained (at operator's expense) to interpret the ground water monitoring results on behalf of all parties. If the three parties cannot agree on the selection of the third party consultant, the County, at its sole discretion, shall select the third party consultant. In any event, the operator shall fund a qualified third party consultant for the life of the project.

The duties of the third-party consultant are to independently interpret data, to conduct well impact analysis, to review the baseline stream conditions developed in the hydrological study required by MM 4.4.1 and DOT 3, to determine when an adverse impact has occurred, to determine size and locations of temporary systems, and to determine the difference between NID and electricity costs, as outlined in subsequent measures. Other related duties may be added as conditions and issues arise over the live of the project.

Design, Engineering, Annexation, and Contract

MM 4.3.4 Prior to the commencement of mine dewatering, the operator shall prepare complete engineering and design plans, as well as an installation schedule, all of which shall be submitted to and accepted by Nevada Irrigation District (NID) for water main trunk line infrastructure (including individual laterals for all High and Moderate risk wells) to all properties within the Study Area, with a permanent water source to be supplied through NID facilities. Such plans will be provided for all parcels.

PD 12 Prior to the commencement of mine dewatering, the operator shall conduct a "windshield" survey of all parcels within the Study Area to determine potential locations for temporary water storage tanks. For all parcels with High and Moderate risk wells and those parcels identified during this survey to pose siting difficulties, plans for the location and size of temporary water systems shall be completed and submitted to the County. Upon submittal, the third party consultant shall review those plans with those parcel owners to ensure the determined locations are agreeable. Any disagreement shall be settled by the third party consultant.



MM 4.3.5 Prior to commencement of dewatering, the operator shall complete the following:

a) Successfully annex any parcel within the Study Area with a well to NID which is currently outside of NID's district boundaries; or enter into a private water supply agreement with the owner of such a parcel until annexation is complete. The operator shall be responsible for any and all costs associated with NID annexation.

b) Enter into a conveyance agreement with NID to allow for infrastructure construction;

c) Enter into an agreement with an engineering company, acceptable to NID, to supervise and direct a contractor to install the water trunk lines and individual residence connections. The County shall be notified of the contractor selected; and

d) Confirm water capacity of NID systems and water availability per NID requirements as a component of any conveyance agreement.

e) Obtain and document all necessary permits and approvals, and identify all right-of-way, variances, easements, and agreements necessary to guarantee installation and delivery of water service from NID to any and all residences in the study area.

MM 4.3.6 Prior to dewatering, the operator shall post financial assurances in a form acceptable to and to be approved of by the Nevada County Counsel and consisting of either a performance and security bond, a letter of credit, cash, certificate of deposit with a recognized financial institution, or a combination thereof, in an amount that will cover 100% of the costs, as determined by a registered civil engineer and as accepted by the County, of providing for permanent water sources to all of the properties within the study area defined in the Final EIR. At least $100,000 of this amount shall be available for immediate use of the County to address emergency water supply needs should the operator not respond to such problems within the 24 hour period designated in MM 4.3.9. The financial security shall contain a provision (to be approved by County Counsel) that creates, in addition to the rights of the County, an independent right of action against the security deposit or bond in favor of any of the owners of the private property whose water supply may be deemed to be adversely impacted by the dewatering of the mine and obligates the operator, the surety/bonding company, or party or financial institution holding the cash deposit to honor any demand by such impacted private property owner, only in the event of non-action by the County for a period of 45 days in response to any such demand for County action by a private property owner. Non-action by the County as used herein is defined as: 1) The County failing to provide written notice to the operator demanding provision of a permanent water source to any affected property when required by conditions of approval; or 2) The County failing to continue for a successive period of 45 days to direct the operator to remedy the situation or to take initiate any claim against the financial assurances when no continuing progress is being made toward provision of a permanent water source until it is provided. The County shall maintain a log of all such contacts from which the 45 successive day period would run. Any independent right exercised hereunder would be in lieu of, rather than in addition to, any right of the County to make a claim against the financial assurance for the affected property concerned.

The amount of the financial security shall include all of the following:

a) Installation of all necessary infrastructure and any necessary improvement to the existing system water supply system, based upon the accepted final design plans (MM 4.3.4).

b) Estimated costs for the installation of the individual laterals to each residence within the study area.

c) Construction costs for the moderate to high risk groups (based upon prevailing wage rates) to perform all the work associated with a) and b) above. All other risk groups shall use construction costs at a non-prevailing wage rate.

d) Costs of providing individual meters to each residence within the study area.

e) NID system capacity charges for each residence.

f) Contingency for administrative costs.

Any lapse or failure to provide or maintain the security deposit or bonds shall result in the immediate suspension of the right to continue any of the use of the property as authorized under the use permit but shall not invalidate the operator's, security's or depository institution's obligation under the security provisions as required under this Mitigation Measure.

In the event that the operator is required to provide a permanent water supply to any of the private property owners under the terms of this use permit, in lieu of providing a permanent water supply the operator may, and subject to the separate and independent concurrence of the private property owner whose well or ground water is deemed adversely affected, purchase any of the affected private properties at a fair market value. Nothing in this permit shall de deemed to require the private property owners to sell their property.

PD 13 In the event the operator is required to provide a permanent water supply to any property or area pursuant to the conditions of this permit, and in the event the operator has successfully and satisfactorily provided the water source, the costs associated with that task may be subtracted from the total financial assurance amount required by MM 4.3.6 above.

Within 24 months, but not less than 6 months from completely dewatering the workings (below the 3,280 foot level), the financial assurance amount may be reviewed by the County (through a public hearing) for the purposes of reconsidering the required amount. If evidence can be provided supporting the fact that the risks have either been reduced or no longer exist, the percentage amount required by MM4.3.6 may be altered. The intent of this provision is to provide an opportunity to reconsider the necessary financial assurance amount. It may be possible to reduce the required amount at this hearing if it is demonstrated that the risks no longer warrant 100% of the total costs required by MM 4.3.6 above. In no case however, will the County consider releasing the entire requirement for the financial assurance.



PD 14 Prior to the commencement of the dewatering, this Use Permit shall be reviewed by the Nevada County Planning Department staff and the results of the review shall be reported to the Planning Commission and the Community Liaison. The purpose of this review will be to evaluate the operator's compliance with the permit conditions of approval and the success of the established performance standards.

VI. ON-GOING WATER SUPPLY

Monitoring Program

MM 4.3.7 Throughout the dewatering process, the operator shall continue the ground water monitoring program, and reports shall be provided to the County as follows:

Weekly intervals for wells within the high and moderate risk groups;

Twice-monthly intervals for wells in the low risk group; and

Monthly intervals for wells in the very low risk group.

Twelve months following the dewatering to the 3,280 level, monitoring will be required at quarterly intervals for the life of the project and until the mine refills (to the pre-project level) with water.

PD 15 Should an impact occur to any residence, the monitoring sequence for the adjacent homes (from the impacted well) shall increase to a weekly interval.

Third Party Consultant

MM 4.3.12 All well owners within the study area will be notified by the third-party consultant if other wells in the study area are showing an impact or change in yield. This condition will allow another chance for non-participating well owners to join the monitoring program, and will generally serve to inform the owner of the surrounding conditions of nearby properties.

MM 4.3.16 All parcels within the study area that are not yet developed shall be connected to the permanent water system at the operator's expense if the well owner can establish to the third party consultant and the County that mine dewatering has adversely affected the property's ability to support a well. The operator shall make notice to properties currently without wells that the burden remains with the well owner to determine the source of impact to any future well.

Temporary Water Source and Compensation

EH 5 In the event that any parcel within the study areas is adversely affected by the mine dewatering, potable water service shall be provided to the properties in accordance with MM 4.3.9 and MM 4.3.9A below. All water provided (on a temporary or permanent basis) for service to habitable structures shall be potable and from an approved source, in compliance with Nevada County Land Use and Development Code, Chapter VI.

MM 4.3.9 Should any well be impacted a temporary water source shall be immediately provided to the affected well owner prior to the installation of a permanent water source. The temporary water source shall be in place within and operational 24 hours after telephonic notification to the third party consultant. The operator shall be required to provide a phone number to all property owners were such notification can be accepted at all times.

Where feasible and subject to the permission of any affected property owners, any temporary water source may include the installation of a water tank on or near the affected property. In some instances, a single tank may serve more than one affected property

Any temporary water supply needed as a result of mine dewatering will be of sufficient capacity and pressure so that the daily lifestyles and average water usage of individual families will not be affected.

Any temporary water supply needed as a result of mine dewatering will be in place only as long as necessary to hook up the residence to the permanent water source.

Temporary water systems will be located, configured and sized by the third-party consultant with the concurrence of the property owner (identified within MM 4.3.8). Property owners must be immediately informed of the identified impact, and permission must be received prior to temporary system installation.

PD 16 In the event the temporary system cannot be installed within 24 hours (as outlined in the first paragraph of MM 4.3.9), a fine in the amount of $500.00 per day (paid weekly) shall be paid to the County starting 24 hours after telephonic notification up until such time that the temporary water system is installed and operating. The County shall deposit the fine(s) into a trust account and will have the choice of utilizing the fines for either permit monitoring costs or property owner(s) compensation.

MM 4.3.9A Should an impact occur in the form of an unexpected and sudden failure of a well, the affected resident shall be provided an immediate source of water supply for the period of time prior to temporary system installation (maximum 24 hours). This immediate supply may include water delivered by truck, bottled water, alternative lodgings (or cash equivalent), at the property owner's discretion, until the temporary supply is established. The costs of all immediate and temporary water supplies and storage facilities will remain the burden of the operator. Furthermore, all water carriers contracted by the operator shall be properly insured and licensed, and certified to carry and deliver potable water as required by law.

MM 4.3.9B Upon removal of the temporary system or installation of the permanent system, the operator shall either restore the property to its original state, including the repair of any damage or scarring caused by tank installation (and/or hook-up) or water truck delivery, or, the property owner will be financially compensated, at the property owner's discretion, for such damages. If financially compensated, a mutual agreement must be reached regarding the existing condition of the property prior to tank installation.

MM 4.3.13 Any well owner impacted by the project who requires NID service will be compensated by the project applicant for any additional costs for monthly water service. The operator shall compensate for the difference between current monthly rates (as determined by the third party consultant), and NID rates. This compensation shall continue for as long as the owner's well is impacted by the project.

MM 4.3.14 In cases where an affected property currently utilizes NID service and well water, the operator shall compensate for the cost of additional NID water usage caused by the unavailability of supplemental well water. Water usage will be determined by the third-party consultant based upon historic water usage patterns.

Permanent Water Source

MM 4.3.10 Installation of a permanent water source shall be initiated immediately after the well(s) have displayed a significant impact (partial or complete dewatering). Such a response will be determined as significant on a case by case basis by the third party consultant identified in MM 4.3.8. Temporary water systems shall be removed once permanent service is in place and operational. The costs associated with engineering and installing the permanent system will be the responsibility of the operator.

On the first day of impact identification to an individual residence, the operator shall coordinate with NID to finalize the service agreement application and pay the necessary hook-up fees for the affected residence. The process and payments will be completed in the quickest manner afforded by NID staff. The contractor hired to make the final connection shall be available, at the operator's expense, immediately upon NID's meter installation.

PD 17 In the event the operator becomes responsible for providing a permanent water source to any residence (as outlined in the above mitigation measure, MM 4.3.10), the operator shall be held to an acceptable time frame for completing the project. Said time frame will be mutually agreed upon by the County, the operator, the third party consultant, and the community liaison. Should the operator fail to complete the project within this time frame, a penalty ($1,000 per week) will be paid to the County up until such time as NID water service is hooked up and operational to all applicable residences. This payment is a penalty only and is not payment in lieu of a permanent water system or supply. The County shall deposit the fine(s) into a trust account and will have the choice of utilizing the fines for either permit monitoring costs or property owner(s) compensation.

VII. EXPLORATION PHASE

Miscellaneous Operations

EH 6 All waste generated shall be classified by Waste Determination Methods pursuant to the California Health and Safety Code, Chapter 6.5 and the California Code of Regulations, Title 22, Sections 66261.2, 66261.3, 66261.20, and all other applicable regulations.

PD 18 The hours of operation for the miscellaneous surface activities associated with this phase of the project shall be limited to 8:00 a.m. to 5:00 p.m., Monday through Friday. This does not apply to the following activities as long as such activities do not result in a violation of any existing County Standards, including but not restricted to, noise impacts:

a. activities associated with dewatering;
b. activities associated with water treatment;
c. indoor equipment maintenance (where the entire activities are enclosed);
d. activities associated with project management;
e. activities associated with the logging of rock core samples;
f. response to life- or property-threatening emergencies; and
g. underground activities.

However. it is recognized that the operator shall attempt to minimize incidental noise impacts during all operations.

MM 4.4.3 In the event that discharge quantities exceed those proposed within the Project Description (6 cfs), the operator shall notify the Regional Board, NCDEH, NID, and the Planning Department immediately to implement a remedial action program or other requirements as set forth by the Board.

MM 4.4.4 In the event that the quality of discharged water exceeds effluent limitations as set forth by Order 94-005 or the individual order for this project, the operator shall take action including but not limited to temporary cessation, reduction, or treatment of the discharge to acceptable levels. The operator shall also immediately notify the Regional Board, NCDEH, NID, and the Planning Department and develop/submit a remedial action program for Regional Board approval and implementation.

MM 4.5.4 Concurrent with project operation, the operator will adopt and adhere to the relevant fire prevention and hazardous material response methods as defined in the County's Fire Protection Ordinance, County Hazardous Material Ordinance and other established regulations regarding emergency response.

MM 4.6.3 Prior to any on-site disposal of timber wastes, the operator must demonstrate, through analytical testing of the timbers, that the wood is untreated and safe. This analysis (waste determination and classification) will be demonstrated to the satisfaction of the County of Nevada Department of Environmental Health. The operator shall be responsible for the hauling and disposal of the material at an appropriate disposal facility, if necessary, once a waste determination is made.

MM 4.7.1 For the duration of the project, haulage vehicles moving equipment and/or materials to and from the site will be restricted to Brunswick Road and that section of East Bennett Road between Brunswick and Millsite Road (E. Bennett entrance). The operator shall post signage on site exit points alerting drivers to designated haul routes.



MM 4.9.2 Throughout the life of the project, the operator shall ensure that all equipment utilizing internal combustion engines shall be properly maintained and fitted with mufflers in accordance with the manufacturers recommendations.

MM 4.11.2 Should cultural or historic resources be uncovered in the course of grading operations, all work in the immediate vicinity of the uncovered material shall be halted until a qualified archaeologist can evaluate the finds and propose suitable recommendations for further action.

MM 4.11.3 Should human remains be discovered, work must stop immediately and the county coroner must be contacted, as required by State law. If the remains are Native American, then the coroner will notify the Native American Heritage Commission.

MM 4.11.4 Should historic mining artifacts be encountered and recovered concurrent with dewatering and exploration activities, such artifacts will undergo an evaluation to determine the material's significance. Such an evaluation will be conducted by a qualified archaeologist.

MM 4.12.1 Concurrent with project implementation, the operator will use the minimum number of light sources and minimum wattage necessary to provide a safe working environment and security at the site.

Underground Operations

MM 4.3.7 Throughout the dewatering process, the operator shall continue the ground water monitoring program, and reports shall be provided to the County as follows:

Weekly intervals for wells within the high and moderate risk groups;

Twice-monthly intervals for wells in the low risk group; and

Monthly intervals for wells in the very low risk group.

Twelve months following the dewatering to the 3,280 level, monitoring will be required at quarterly intervals for the life of the project and until the mine refills with water.

MM 4.3.15 Should water be encountered within any core drill hole during the exploration process, that drill hole shall be immediately sealed or plugged upon removal of the core material to prevent the continued flow of water. The operator shall then notify the County and the Community Liaison of said encounter.

MM 4.4.7 During implementation of the shaft rehabilitation, timbers pressure-treated with substances which may leach toxins into future mine water shall not be used. The project applicant shall indicate the type and amount of replacement timber to the County prior to its use.

MM 4.5.7 Prior to the commencement of project activities which require the work of personnel below ground, the project applicant shall coordinate with other local mining operations and local fire protection districts to establish and maintain a cooperative mine rescue station, per the requirements of Title 8, Article 30 of the California Code of Regulations.

MM 4.5.8 Prior to the commencement project activities which require the work of personnel below ground, the operator shall contact the Mining and Tunneling Unit of the Division of Occupational Safety and Health or other certified entity to schedule and receive specialized safety and rescue training pursuant to the provisions of Title 8. The operator shall include and invite appropriate OHFPD and NCCFPD personnel in any scheduled training sessions. The Districts and the operator shall decide cooperatively upon the appropriate fire protection district personnel to be trained.

MM 4.6.1 Concurrent with final site plans for the project, the underground powder magazine shall be located in accordance with the American Table of Distance for Storage of Explosives. All use and transport of explosives will conform to applicable federal, State and local regulations, requirements, and specifications.

MM 4.6.2 Concurrent with project operations, all activities relative to site preparation, dewatering, shaft rehabilitation and mineral exploration shall be conducted in conformance with MSHA and CALOSHA regulations.

MM 4.9.3 Concurrent with dewatering operations, the operator shall retain a consultant acceptable to the County to conduct a noise level measurement survey with the project in normal operation to ensure compliance with Nevada County noise standards. If it is determined that project noise emissions are excessive, noise control devices shall be incorporated into the project design to reduce noise impacts to a less-than-significant level.

VIII. POST PROJECT

MM 4.6.5 At the completion of dewatering and exploration, the removal of waste sludge will be accomplished under proper permitting through the Department of Toxic Substances Control (DTSC), the Nevada County Department of Environmental Health (NCDEH) or other responsible agency. Prior to removal, the material will be analyzed (to the satisfaction of the RWQCB and NCDEH) to determine if it exhibits characteristics of hazardous waste. Based upon the analytical results and prior to off-site removal, the operator will explore the possibility of on-site (stope) disposal.

MM 4.6.6 Prior to pond sediment removal, the operator shall apply for and appropriate any necessary hazardous material, hazardous waste, or other permits or plans as required through the authority of the NCDEH.

PD 19 Upon completion of the project, the New Brunswick Shaft shall be safely secured to prevent further mine entry. If prior to project completion, a new application is sought to reopen the mine, this condition may be sustained until a determination is made on that application.



The applicant/operator is also responsible for compliance with applicable State Laws and County Ordinances including Article 32 of the Land Use and Development Code. In order to maintain a valid permit, Article 32 requires that you commence your project no later than January 25, 1998, and complete the dewatering and exploration and all post project activities (Section VIII of this Permit) no later than January 25, 2000. If you will not have commenced on-site construction activities (Section III of this Permit) prior to that starting date, you may apply for an extension of time **prior** to January 25, 1998. If you do not commence your project pursuant to Section L-II 32.1.A of the Nevada County Land Use Code by the above-referenced dates or do not request in writing an extension of time for those dates, the permit shall become null and void.

Pursuant to the requirements of the Land Use and Development Code, you are hereby notified that this permit is not valid until the expiration of ten (10) days from the date of the Planning Commission action. If the granting of the permit is appealed or submitted to the Board of Supervisors for final action, the effective date is stayed until final action by said Board. Any appeal must be submitted on the proper form which is available from the Clerk to the Board of Supervisors, Eric Rood Administrative Center, Nevada City, California 95959 (Deadline for appeal: February 5, 1996, at 5:00 p.m.).

You are advised not to commence any work on this permit until the ten-day period expires and to check with the Planning Department to determine if any appeal has been submitted.

Should you have any questions, please contact the project planner, Tod Herman, at (916) 265-1257.

NEVADA COUNTY PLANNING COMMISSION
Thomas Miller, Acting Ex-Officio Secretary

By: Deborah A. Keyser
DEBORAH A. KEYSER
Clerk to the Planning Commission

TM:dk

cc: Building Department
Department of Transportation
Environmental Health Department
Northern Sierra Air Quality Management District
Regional Water Quality Control Board (Central Valley)
Scott Galati, Esq.
BARC

NEVADA COUNTY PLANNING COMMISSION
STAFF REPORT

APPLICANT: Emperor Gold (U.S.) Corporation
SUPERVISORIAL DISTRICT: III
HEARING DATE: January 25, 1996
FILE #: U94-017

PROJECT: **U94-017.** Use permit application of ***Emperor Gold (U.S.) Corporation*** for the dewatering of the existing underground workings of the Idaho Maryland Gold Mine, and the subsequent underground exploration and sampling of those workings. Specifically, the dewatering activities will necessitate the clearing of the entire underground mine workings to a depth 3,280 feet below the shaft collar. Approximately 6 cfs (12 acre-feet/day) of water will be pumped into the existing 40 acre-foot pond on site. The estimated volume of water within the workings is 2,500 acre-feet, which will take approximately 7 months to dewater. Once the mine is dewatered, the pumping will be maintained (at an estimated average of 1.1 cfs to 2.7 cfs) in order to allow the exploration activities to continue. The retention pond water will be aerated to allow excess iron, manganese, and arsenic to precipitate. From that point, the water will either be discharged in the South Fork of Wolf Creek, or a portion may be diverted for domestic uses. The exploration activities will be conducted within the existing underground workings (the sampling will occur off-site). Diamond drilling and blasting will be conducted at or below 2,000 feet beneath the surface, and channel samples will be collected from selected areas. Bulk samples of gold-quartz mineralized rock will be shipped off-site in containers for further testing. Bulk sample size could range from 0.25 to 10 tons, with the maximum estimated tonnage of bulk samples at 70 tons. All waste rock from the exploration activities will be stored underground in the abandoned stopes. Most of the on-site exploration activities will be completed over a 20 month period. However, the New Brunswick shaft could be kept open for up to 5 years in order to continue economic evaluation. If the exploration and sampling results are encouraging to the operator, an additional permit may be sought to formally re-open the mine for production. No mining is proposed with this application.

LOCATION: The Idaho Maryland Mine project location is described in two formats: 1) where the surface activities (office, underground mine access, and the dewatering process) will be located; and 2) the extent of the underground mineral rights. Emperor Gold controls the surface rights to 117 acres of contiguous property located southwest of the intersection of Brunswick Road and East Bennett Road. This includes the 80 acre Bohemia Mill site. The Idaho Maryland subsurface mineral rights includes 2,750 contiguous acres which irregularly extends into portions of Sections 23, 24, 25, 26, and 36 of Township 16 North, Range 8 East, and Sections 19, 29, 30, and 31 of Township 16 North, Range 9 East.

Emperor Gold (U.S.) Corporation

FACTUAL DATA:

General Plan:	Industrial
Zoning:	"M1"
ZDM:	#53
Lot Size:	117 ac.
APN:	06-441-03, -04, -05, -29; 09-630-24, -27, -30, -31
Sup. Dist.:	III

SERVICES:

Water:	N.I.D.
Sewage:	Septic
Fire:	Ophir Hill Fire District
Schools:	Grass Valley/NUHS
Recreation:	Grass Valley

Prev. File #: SP77-20; MSP86-16; MSP87-5; Z93-04, EIS93-042, MI91-016; MSP90-02

RECOMMENDED ACTIONS:

Use Permit: Approve subject to staff's recommended Mitigation Measures and Conditions of Approval.

ATTACHMENTS:

1. Project Findings of Fact
2. Use Permit Mitigation Measures and Conditions of Approval
3. Mitigation Monitoring Program

BACKGROUND

The last association the Planning Commission had with this project was the certification of the Final EIR in October. That action was appealed to the Board of Supervisors who considered the appeal last December. After the close of the public hearing, the Board determined the Final EIR was adequate - with the addition of a proposed Water Supply Plan the applicant has prepared - and upheld your Commission's determination.

Outside of the public hearing process, there have been a number of meetings involving Planning Department staff, County Counsel, members of the Bohemia Area Residents Committee (BARC), and the applicant. The purpose of these meetings has been to negotiate the conditions of approval (and the mitigation measures) through agreement with various parties. In a few cases our recommendation does not represent a consensus since there wasn't agreement on some issues. Staff will highlight those in our presentation.

PROJECT PROPOSAL

The Planning Commission will be familiar with the proposed project through its review of the specific project description section within the environmental impact report (Section 2.0 of the Draft EIR, and as revised in Section 5 - 2.0 of the Final EIR).

Essentially, the project will remove the water from the underground workings of the Idaho Maryland Mine. During this process of dewatering, the main shaft (New Brunswick Shaft) will be rehabilitated as necessary. The applicants propose to perform some exploration drilling and sampling to determine the extent of the resources. The sampling activities will occur off site at some other location. When the mine is empty, the condition of the workings will also be evaluated. The results of these activities will determine whether it will be feasible to reopen the mine at some future date, under a new use permit.

STAFF COMMENT / USE PERMIT

The last step in this process is to consider the use permit for the project. Throughout the various hearings on the EIR, a few issues have been deferred to this point. Also, ingrained within the use permit is the Remedial Water Supply Plan, something identified in the EIR as critical to an approval of this project. This is the program for insuring that no home will be left without water as a result of this project. And, coupled with the water supply plan is the need for a financial assurance to guarantee the plan will be carried out if ever needed. Last, but not least, the permit process also involves the adoption of a Mitigation Monitoring Program. Each of these items will be discussed below.

The Planning Commission should take note that the conditions of approval for this use permit are divided into eight separate categories - each representing an identifiable step in the project. These categories (or steps) are as follows: General (applicable throughout the project), Subsequent Permit(s) Acquisition, On-Site Preparation, Off-Site Preparation, Pre-Dewatering Water Supply, On-Going Water Supply, Exploration Phase (on-going project), and Post Project. To make the conditions fit neatly into these categories, the numbering format has been modified somewhat. This will make clear which conditions (and mitigation measures) are applicable to each step in the project.

Pre-project Infrastructure

Much of the focus on this project has been aimed at the potential impacts associated with the dewatering. That "potential" has resulted in a series of debates as to whether the risk warrants the installation of some of the infrastructure before the dewatering activities begin. On one side of the debate, having the main infrastructure in place (only for the high and moderate risk wells) before the dewatering would reduce the overall time to bring permanent water to those impacted residences. On the other side, everyone will be covered by the financial assurance (adequate to cover all the costs to hook homes up to permanent water) anyway and if the impact never occurs, the money spent on the infrastructure would be unnecessarily spent.

This critical debate has not yet been decided by the County, although it has been raised many times throughout the EIR process (including the appeal). The County's position has been that this will be an issue for the use permit to decide. In anticipation of this opportunity, staff has attempted to negotiate a resolution to this issue.

The applicant had shown a willingness to consider the partial installation of the infrastructure (defined as the main trunk line down E. Bennett Road serving those parcels in the high and



moderate risk groups) on the condition that a substantial "portion" of the financial assurance be released after the risk has been "substantially diminished" (defined as approximately six to twelve months after the entire workings have been dewatered). Although there are merits to this argument, staff has chosen to err on the conservative side and - at this time - recommend not to relinquish the financial assurances based, solely on the theory that all of the impacts will be known soon after the mine working have been emptied.

Because of this conservative approach, staff also cannot support the requirement for the pre-dewatering infrastructure installation. Staff believes that having an appropriate financial assurance in place (covering those costs associated with the entire study area infrastructure installation) will ensure that if any problems do occur, a solution will be available. Granted, it may not be as quick - but it would happen. This also avoids having to second-guess the definition of the terms such like "portion" and "substantially diminished."

Remedial Water Supply Plan

Assuming the use permit is approved as recommended, the Remedial Water Supply Plan will be as follows:

Prior to the commencement of mine dewatering, the complete design of the water system infrastructure, easements, and individual hook-ups needed for all homes within the established study area will be completed by the operator. Those plans will then be checked and accepted by the County and NID. Additionally, the operator will secure a list of contractors who will be ready and able to carry out the installation project.

A complete monitoring program will [again] be established [or added to]. All parcels within the study area will be notified of the approved project and given additional opportunities to sign up for the program.

The County will hire a qualified independent Consultant to review/coordinate the monitoring program and evaluate the results of the monitoring. Additionally, a variety of other assignments related to water issues will be assigned to this person.

The community will establish a contact person (or liaison) who will serve both the surrounding community and the mine operator. This liaison will help to transfer information between the operation and the community.

A financial assurance will be provided to the County to cover those cost associated with the installation of the permanent water system.

The operator will secure temporary systems and keep them on site and available for an instant response to any ground water loss. Additionally, the particulars associated with the location of these systems will be established.



All of these items will be in place before any dewatering begins. When the dewatering begins, the ground water monitoring will be closely watched by the County's consultant. Then, should a well ever become impacted, the temporary system(s) can be installed and the plans for bringing in permanent water will be in place ready to give to a construction company. Additional incentives (read: fines) have also been incorporated into the recommended conditions to ensure that the operator quickly responds.

Limits to the Plan

In addition to how this Plan works, a question has been raised as to who is actually covered by this Plan. The question has come from a few people who live beyond the defined study area. In response to this question, staff's interpretation of General Plan Policy 17.12 is that the Remedial Water Supply Plan should cover only those who in the "expert's opinion" may be impacted. In this case, the County has hired a qualified consultant (Willdan/PMC and Sierra Pacific Groundwater Consultants) to evaluate the ground water issue.

The first step of the EIR's ground water study actually addresses this question by defining the study area. The area was defined (in Section 4.3) using both the surface and subsurface features. These include the boundaries of the local drainage basin (surface features) and the location of those fault structures containing dense, impermeable barriers (subsurface features). Using that study, the County can make a qualified decision based on factual evidence. Your Commission may recall that within this study area, all the known wells (101) were placed into one of four risk groups ranging from High to Very Low. And even though "Very Low" has been determined to be highly unlikely to be impacted, those wells are still covered under this proposal. Staff would not recommend going beyond those established boundaries at this time.

Financial Guarantee of Permanent Water Supply

As stated above, staff is recommending that a financial assurance be in place to cover 100% of the costs for providing permanent water to all parcels within the study area. Mitigation Measure 4.3.6 has been modified from the version in the Final EIR to provide the structure for this financial assurance.

Staff has, however, recommended (through Condition PD 13) two opportunities for this financial assurance to be reduced. The first would be if the operator ever has to provide permanent water to any area, and only after the water has been provided, those costs associated with that water project may be returned to the operator from the original financial assurance amount. Obviously, the theory being that if the area now has water, there is no longer a need for the County to hold those costs. The second opportunity is not an absolute either. Staff is recommending reevaluation of the financial assurance amount 24 months after the entire workings have been dewatered. Going back to the EIR's ground water hydrology study, the impacts (if any) should (in theory) be realized sometime after the workings have been dewatered below the fractured rock zone (approximately 330 feet). Again, as a safety measure, two years is being recommended as a conservative time to allow for those impacts to occur. If at that time those



impacts have not yet been realized, then it may be a safe bet to assume the impacts might not ever occur. Assuming that can later be proved, staff is recommending a public hearing be held in order to discuss a partial release of the financial assurance.

Mitigation Monitoring Program

Associated with the use permit is the Mitigation Monitoring Program, established through the EIR. The purpose of this monitoring program is to identify the timing and responsibility of each mitigation measure. Attachment #2 is a draft Mitigation Monitoring Program prepared by Willdan Associates/PMC. You will note that the measures listed in the monitoring program resemble those found in the Final EIR. The many cases, the text of the mitigation measures have been clarified - resulting in changes to the wording from those found in the Final EIR. But, in those cases, the measures remain consistent with the purpose of the original mitigation, and with who and when will be responsible for the measure. Thus, the basic program still works and can be used as a matrix for the purposes of the monitoring program.

Other Issues

There is general agreement on the mitigation needed to deal with issues other than water, including light and noise. Again, staff will highlight those in our presentation.

ACTIONS FOR CONSIDERATION

Staff recommends the Planning Commission take the following actions:

I. Prior to taking action on the project, review and consider the previously certified Final EIR and determine that the project is consistent with the project description.

II. Pursuant to Section 15092 of the CEQA Guidelines, review and consider making the **Environmental Findings** for this project found in Attachment #1 of this staff report.

III. Approve the Use Permit (U94-017) subject to the Mitigation Measures and Conditions of Approval found in Attachment #2 of this staff report.

IV. Also based upon the certification of the Final EIR, and the approval of the Use Permit, adopt the Mitigation Monitoring Program found in Attachment #3 for this project complete with any changes to the Mitigation Measures resulting from the public hearing.

V. Pursuant to Section L-II 31.5 of the Land Use and Development Code, upon approval of U94-017, make the **Use Permit Findings** found in Attachment #1 of this staff report.

Bruce Abelli-Amen, PG, CHg

BASELINE ENVIRONMENTAL CONSULTING

Principal, Certified Hydrogeologist



Areas of Expertise

Project management, CEQA, hydrology and water quality, geology, hazardous materials management

Education

M.S., Environmental Systems, Applied Geology, Humboldt State University, 1988

B.A., Geological Sciences, University of California, Santa Barbara

Registrations/Certifications

Certified Hydrogeologist No. 96, 1995

Professional Geologist No. 5593, 1993

Years of Experience

31 Years

Bruce Abelli-Amen, owner and Principal of Baseline, is a Certified Hydrogeologist, Professional Geologist, and a CEQA project manager. He also manages hazardous materials investigations. He has experience in all phases of CEQA and NEPA projects, including a wide range of project types from small focused projects to managing large multi-disciplinary teams of specialists in the preparation of Expanded Initial Studies, Mitigated Negative Declarations, and Environmental Impact Reports and Statements. He has managed CEQA projects for landfill decommissioning, new wastewater treatment plants, mining projects, resource management plans, mixed-use developments, and major water and sewer conveyance infrastructure projects (including tunnels and pipelines).

Bruce has managed numerous on-call environmental services contracts for municipal agencies, including SF Public Works, SF Public Utilities Commission (SFPUC), Port of Oakland, Port of SF, Yolo County, City of Milpitas, Town of Windsor, and others.

He also has experience with construction management, mitigation monitoring, and permitting, which provides useful insights into the development of feasible and practical bid specifications and mitigation measures for identified significant CEQA impacts.

He has extensive experience managing hazardous materials investigations and has designed and implemented groundwater aquifer tests and remediation systems for the cleanup of contaminated shallow groundwater aquifers. He has managed numerous underground storage tank (UST) investigations and is familiar with local, state, and federal regulatory requirements for such investigations. He has supervised soil excavation, large scale bioremediation projects, and backfill operations.

Project Experience

Various On-Call Environmental Consulting Contracts, Contract and Project Manager for on-call contracts with City of Berkeley, San Francisco Public utilities Commission, SF Public Works, City of Milpitas and Sonoma County Water Agency.

SFPUC Channel Tunnel EIR, Project Manager for preparation of comprehensive CEQA documents (detailed initial Study and focused EIR).

KC BBQ Meat Smoker Emission Evaluation, Project Manager in assisting City of Berkeley Attorney's Office in evaluation of air quality impacts associated with wood smoke emissions.

Foster City Levee Improvement Project EIR, Technical Project Manager for preparation of EIR. Prepared and/or provided review for technical sections including hydrology, geology, hazardous materials, noise, air quality, GHG, and alternatives.

City Place EIR, Santa Clara, Project Manager for Geology, Groundwater Hydrology and Water Quality, and Hazardous Materials sections.

Apple Campus EIR, Cupertino, Project Manager for Geology, Hazards, and Hydrology EIR sections.

Patrick Sutton, P.E.

BASELINE ENVIRONMENTAL CONSULTING

Senior Environmental Engineer



Areas of Expertise

Air Quality, GHGs, Hazardous Materials, Geology, and Hydrology

Education

M.S., Civil and Environmental Engineering, University of California – Davis

B.S., Environmental Science, Dickinson College

Registration

Professional Engineer No. 13609 (RI)

Years of Experience

17 Years

Patrick Sutton is an environmental engineer who specializes in the assessment of hazardous materials released into the environment. Mr. Sutton prepares technical reports in support of environmental review, such as Phase I/II Environmental Site Investigations, Air Quality Reports, Greenhouse Gas (GHG) Reduction Plans, and Health Risk Assessments. He has prepared numerous CEQA/NEPA evaluations for air quality, GHGs, geology, hazardous materials, and water quality related to residential, commercial, and industrial projects, as well as large infrastructure developments. His proficiency in a wide range of modeling software (AERMOD, CalEEMod, RCEM, CT-EMFAC) as well as relational databases, GIS, and graphics design allows him to thoroughly and efficiently assess and mitigate environmental concerns.

For mixed-use development projects, Mr. Sutton has prepared health risk assessments for sensitive receptors exposed to toxic air contaminants based on air dispersion modeling. He has also prepared GHG Reduction Plans to demonstrate how projects can comply with State and/or local GHG reduction goals. For large highway infrastructure improvement projects, Mr. Sutton has prepared air quality and hazardous materials technical reports in accordance with Caltrans requirements. Air quality assessments include the evaluation of criteria air pollutants, mobile source air toxics, and GHG emissions to support environmental review of the project under CEQA/NEPA and to determine conformity with the State Implementation Plan. Hazardous materials investigations include sampling and statistically analysis of aerially-deposited lead adjacent to highway corridors.

Project Experience

Oakland Downtown Specific Plan EIR. Prepared a program- and project-level Air Quality and GHG Emissions analysis. Developed a mitigation measure with performance standards to ensure GHG emissions from future projects comply with the Citywide 2030 GHG reduction target.

I-680 Express Lanes from SR 84 to Alcosta Boulevard Project. Prepared Initial Site Assessment and Preliminary Site Investigation to evaluate contaminants of potential concern in soil and groundwater. Prepared Air Quality Report to determine the project's conformity to federal air quality regulations and to support environmental review of the project under CEQA and NEPA.

Altamont Corridor Expressway (ACE/Forward) Project EIR/EIS. Prepared a program- and project-level Hazardous Materials analysis for over 120 miles of railroad corridor from San Jose to Merced. Hazardous materials concerns, such as release sites, petroleum pipelines, agricultural pesticides, and nearby school sites were evaluated in GIS.

Stonegate Residential Subdivision EIR. Prepared a project-level Hydrology and Water Quality analysis for a residential development located within the 100-year floodplain. The proposed project included modifications to existing levees and flood channels.

BART Silicon Valley Extension Project. Prepared Initial Site Assessment and Hazardous Materials EIS/EIR section for extending 6 miles of proposed BART service through the Cities of San Jose and Santa Clara.

Exhibit B

9 March 2022

Laurel Impett
Shute, Mihaly & Weinberger LLP
396 Hayes Street
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Subject: **Idaho-Maryland Mine Project, Nevada County, CA**
Acoustical Comments on Draft Environmental Impact Report
Salter Project 22-0039

Dear Laurel:

As requested, we reviewed Chapter 4.10 Noise and Vibration of the Draft Environmental Impact Report (DEIR) for the proposed mine project in Nevada County, CA. We also reviewed information in Appendices L (Noise and Vibration Study) and M (Blasting Report). This letter summarizes our review and comments.

EXECUTIVE SUMMARY

In our opinion, the DEIR does not sufficiently assess or mitigate potential noise impacts and, therefore, fails to protect the community from excessive noise. Our comments focus on the following issues:

Grp 21-129

1. In general, nighttime noise is not adequately addressed in the DEIR. It outright dismisses the potential for noise impacts due to sleep disturbance and inappropriately excludes this consideration from the analysis. The combination of nighttime industrial activities amongst a community that currently enjoys low ambient noise levels represents a significant risk for project noise to impact the community, annoy residents, and cause sleep disturbance. Additional details of likely impacts are outlined below.
2. Engineered fill operational noise is underestimated in Impact 4.10-2. This 5 to 6-year long activity could generate noise levels at least 10 to 18 dB higher than predicted in the DEIR. This is a significant deficiency in the impact analysis. As such, the project's noise levels could be 20 to 35 dB louder than current median/background ambient noise levels, causing a severe impact. In several cases, the DEIR analysis fails to address sensitive receptors located farther away from existing roadways that currently have a lower background noise.

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3. The DEIR fails to adequately analyze the project's impact from mineral processing operations because assumptions are made regarding conditions or constructions that would constitute notable "upgrades" to standard measures. However, these upgrades are not disclosed as being required to meet the County standards and reduce noise to a less than significant level. Without these upgraded measures, mineral processing noise could exceed the County noise standards. As currently written, the DEIR appears to "promise" an insignificant noise impact, but fails to include the controls, assurances, and appropriate mitigation to ensure this claim is actually achieved.
4. Blasting vibration impact is not adequately analyzed (see Impact 4.10-4). In our opinion, potentially subjecting residents to "strongly perceptible" and borderline "unpleasant" vibration on a regular basis for the rest of their lives should be considered a significant impact. In particular, the DEIR fails to include crucial guidance from the U.S. OSMRE Blasting Guidance Manual restricting blasting vibration during evening and nighttime hours. If blasting must be allowed at these sensitive times, the DEIR must also incorporate adequate mitigation with a notably stricter limit at all sensitive receptors.
5. The DEIR includes a claim anticipating a 20 dB reduction of blasting noise at the portal compared to the reference Sutter Gold mine project. However, this 20 dB claim is unsubstantiated. If this claim is in error, the community could be subject to excessive noise levels, up to 75 dBA, during blasting. This would be concerning during daytime hours, but a particularly egregious condition at night.

COMMENTS

#1 – Nighttime Noise Impact is Not Adequately Addressed

Grp 21-130

The DEIR states that "an evaluation of sleep disturbance is not warranted for this project." (DEIR, page 4.10-23, paragraph 2) However, the conditions of this project and the community certainly warrant a detailed analysis of nighttime noise and the potential for sleep disturbance. This project includes many operations that will occur at nighttime hours, including dewatering, indoor facility construction, truck loading/unloading and off-site hauling (from 6 to 7 am), mineralization processing above ground, and water treatment (DEIR, page 3-37). In addition, many of the nearby sensitive receptors are located away from notable sources of ambient noise, and thereby currently enjoy very low nighttime background noise levels between 30 dBA and 45 dBA (DEIR, Appendix L, Appendix B-1 within). The combination of nighttime industrial activities and low background/ambient noise levels represents a potentially significant risk and an undisclosed impact to the community, as it could annoy residents and cause sleep disturbance. A revised EIR should identify appropriate mitigation, including limitations on nighttime noise.

#2 – Engineered Fill Operation Noise is Underestimated (Impact 4.10-2)

Grp 21-131

Placement and compaction of engineered fill operations are expected to occur for at least 5 to 6 years at the two industrial sites. The DEIR assesses noise from bulldozer, grader, excavator, front-end loader, and compactor use. It assumed that noise from such activities would generate levels up to 85 dBA at a

distance of 50 feet from each source. It assumed this level for both average (Leq)[1] and maximum (Lmax)[7] levels. The analysis was performed using a SoundPlan computer noise model to estimate sound propagation away from the sites.

2A – The Brunswick Site

The DEIR lists predicted noise levels around the Brunswick Site in DEIR Table 4.10-14, compares the results to proposed daytime noise criteria and concludes that operational noise from engineered fill operations in this area would be less than significant. However, Salter performed basic calculations of one 85 dBA noise source (equal to the DEIR assumption that a machine would generate 85 dBA at a distance of 50 feet). We determined that the DEIR has significantly underestimated noise levels at the nearest receptors. We provide this comparison in Table 1 below.

Table 1. Comparison of DEIR predicted noise levels to noise levels from one construction noise source.

Receptor	Receptor Distance	DEIR Predicted Noise Levels (L_{eq} & L_{max}, Table 4.10-14)	Calculated Noise Level (dBA) from one 85 dBA source at the Receptor Distance	Delta (dB)
26	300	51	69	+18
24	350	50	68	+17
23	400	55	67	+11
22	500	52	65	+12
28	500	47	65	+17
27	600	46	63	+16
25	650	50	63	+11
21	700	47	62	+13
20	1000	46	59	+10
29	1200	40	57	+14
19	1300	40	57	+13

Comparing the levels listed above, it appears that the DEIR predictions are substantially underestimating the level of engineered fill operational noise that the surrounding community is expected to experience. Based on our review of the DEIR methodology, analysis descriptions, and commentary, we find no apparent reason for the discrepancy. For example, we would not expect noise to be further reduced at these nearest receptors from "shielding" by the terrain as they are located on the surrounding hillsides which overlook the Brunswick industrial area. In addition, noise levels could be even higher since multiple

1 L_{eq} – The equivalent steady state A-weighted sound level that, in a stated period of time, would contain the same acoustic energy as the time-varying sound level during the same period.

7 L_{max} (Maximum Sound Level) – The maximum sound level for a specified measurement period of time as defined in ASTM E1686.

machines and activities are expected to operate simultaneously at the site. In our professional opinion, the DEIR analysis needs to be revised.

Grp 21-132

By underestimating the noise levels at sensitive receptors, the DEIR fails to identify and mitigate a significant noise impact. We compared the calculated noise levels from a single 85 dBA noise source to the DEIR criteria. Per Table 1 above, noise from a single 85 dBA source is expected to be between 57 dBA and 69 dBA at the 11 nearest receptors to the Brunswick Site (i.e., nearest the engineered fill area). The Daytime Noise Criteria for these receptors are between 53 dBA and 65 dBA (per DEIR Table 4.10-14). Many of the calculated noise levels from a single 85 dBA source exceed these criteria, by up to 14 dB. This is a significant increase over the criteria established in the DEIR. Therefore, we expect that an updated analysis would identify a significant impact and therefore require mitigation of the engineering fill operations that are expected to last for many years.

Grp 21-133

Furthermore, we compared the calculated noise levels from a single 85 dBA noise source to the ambient noise levels in the surrounding areas, particularly areas with lower background noise levels. The DEIR fails to pay special attention to these sensitive receptors. Away from the major roadway, ambient noise levels were measured to be approximately as follows (see DEIR Appendix L – Appendix B-6 for Monitoring Sites 1 through 4):

- L_{eq}: 60 dBA to 65 dBA (the hourly average noise level, includes intermittent noise)
- L_{50}: 40 dBA to 50 dBA (the median noise level; 50% of the hour noise is below this level)
- L_{90}: 35 dBA to 45 dBA (the "background" noise level)

The L_{eq} metric is the hourly average noise levels and includes the effect of intermittent noise, which appears to be the cause for the higher L_{eq} levels. However, the median and "background" ambient noise levels indicate that much of the time people experience notably lower noise levels (e.g., between those intermittent events). The median/L_{50} noise levels indicate that people in the area enjoy quieter noise levels below 40 dBA to 50 dBA 50% of the time (specifically, 50% of each hour). Therefore, it is appropriate to review expected engineered fill operational noise levels in light of these lower ambient noise levels that people actually experience.

As stated above, noise from a single 85 dBA source is expected to be between 57 dBA and 69 dBA. Therefore, engineered fill operational noise could be approximately 20 to 30 dB louder than the median ambient noise levels of 40 to 50 dBA. Project noise could be up to 25 to 35 dB above "background" (L_{90}) ambient noise levels of 35 to 45 dBA. Based on our experience with community noise and commonly used thresholds of significance (e.g., a 5 dB increase), 20 to 35 dB increases in noise would be a severe noise impact. These levels would be perceived as more than 4 times as loud as the median ambient noise levels and would be expected to result in an aggressive community response and complaints. This should be taken into consideration in the DEIR analysis and further mitigation applied to reduce the expected noise impact on the nearby community from engineered fill operations.

2B – The Centennial Site

Our review of the DEIR's analysis of engineered fill operations at the Centennial Site is similar to our findings for the Brunswick Site, see a summary in Table 2 below. Again, the DEIR appears to underestimate noise from these operations at the nearest sensitive receivers. In our opinion, the DEIR analysis is inadequate and needs to be revised.

Table 2. Comparison of DEIR predicted noise levels to noise levels from one construction noise source.

Grp 21-134

Receptor	Receptor Distance	DEIR Predicted Noise Levels (L_{eq} / L_{max}, Table 4.10-12)	Calculated Noise Level (dBA) from one 85 dBA source at the Receptor Distance	Delta over DEIR L_{eq} (dB)
1	500	54 / 61	64	+10
2	600	50 / 60	62	+12

In addition, it is worthy to note that the area with the greatest planned quantity of fill and elevation change at the Centennial Site is nearest these sensitive receptors (#1 and #2) to the north. We would expect there to be many times where activity, and noise, is focused in the northern portion of the site, close to sensitive receptors.

#3 – The DEIR Underestimates the Project's Potential Noise Impact from Mining Operations (Impact 4.10-3)

Grp 21-135

In the analysis of several mining operational components, the DEIR assumes the implementation of several notable "upgrades" to standard measures. The DEIR concludes that mining operational noise would be below County standards and the project's impact would be less than significant. The DEIR provides no evidence that these upgrades will be implemented in the design and construction of the mining facility. If the facility were to be constructed without these measures, the project's noise would be higher than the DEIR discloses, and the project's impacts could be significant. The DEIR should be revised to analyze the project's noise impacts with and without these "upgrades." It is also important to note that if this analysis were not to occur until after the project is approved and if noise was found to exceed the criteria, it would be challenging, time consuming, and possibly infeasible to add these measures after the fact. Meanwhile, the community would be impacted by excessive noise.

Examples of such assumed upgrades are listed below:

- The metal building enclosing noise generating activities, such as mineral processing, is quoted in the DEIR as having sound transmission loss ratings ranging from "31 dB at 125 Hz to 75 dB at 4,000 Hz. In addition, the metal building would have double doors (i.e., airlock) to prevent sound escaping when one set of exterior doors are open" (DEIR, page 4.10-38, paragraph 4). In the Noise and Vibration Study (DEIR, Appendix L), information on proposed metal building construction is provided (DEIR, Appendix L, Appendix page D-3 within). The construction options include systems with STC ratings between STC 21 and STC 54. The sound ratings quoted in the DEIR indicate that the analysis assumes

that the STC 54 construction will be used. This is the highest rating achievable by the example metal building system. The DEIR must disclose whether this highly sound isolating construction is needed to reduce noise from mineral processing to meet the County's noise standards.

- The ventilation fan(s) required for the mine will be very large industrial units. The DEIR assumes "the effects of a silencer providing comparable sound attenuation as the other industrial buildings proposed at the site" (DEIR, page 4.10-41, paragraph 1). The DEIR analysis implies that this silencer will provide more than 40 decibels of fan noise reduction. This would require the selection of a high-performance industrial fan silencer. The DEIR must disclose whether this high-performance silencer is needed to reduce ventilation fan noise to meet the County's noise standards.

Grp 21-136

- The project's water treatment noise attenuation assumptions are vague and unsubstantiated.
  - The primary noise source associated with the water treatment plant would be the pumps and the turbine aerator (DEIR, page 4.10-42). The DEIR quotes the Auburn California Wastewater Treatment Plant noise level of 50 dBA at a distance of 500 feet as the basis for its analysis (DEIR, page 4.10-43, paragraph 1). To generate 50 dBA at 500 feet, a single source of noise would also be generating a noise level of 90 dBA at a distance of 5 feet. However, the DEIR analysis of water treatment equipment noise is based on a noise level of 75 dBA inside the treatment plant (DEIR Appendix L, page 55, paragraph 5). It seems that either the assumed noise level of 75 dBA inside the plant is an error or the analysis is based on additional attenuating measures that are not disclosed in the DEIR. Therefore, either the DIER analysis should be revised to account for accurate noise levels or The DEIR must disclose whether attenuation of pumps and turbine aerators is needed to reduce the noise to meet the County's noise standards.

Grp 21-137

  - The DEIR also states that the water treatment equipment "will be located inside a building providing a high degree of sound reduction" (DEIR Appendix L, page 55, paragraph 5). The DEIR must disclose whether this high-performance building enclosure is needed to reduce water treatment equipment noise to meet the County's noise standards.

- The DEIR appears to rely on specific assumptions regarding backup generators, including engine exhaust mufflers, sound isolating building construction, and radiator fan silencers, but the document does not identify the specific nature of this equipment. Nor does it identify the expected noise attenuation of each piece of equipment.

Grp 21-138

- The DEIR does not provide the required information about the noise reducing enclosure for the mine compressor.

Grp 21-139

- The DEIR does not provide the required information about acoustical performance of the sound-isolating headframe building construction (to reduce "shaft skipping" noise).

Grp 21-140

As currently written, the DEIR appears to "promise" a less-than-significant noise impact, but omits the controls, assurances, and appropriate mitigation to ensure this claim is actually achieved. Without requiring the aforementioned noise reducing measures, or assumed "upgrades," the DEIR fails to adequately protect the community from the potential for excessive noise.

Grp 21-141

#4 – Blasting Vibration Impact is Not Adequately Addressed (Impact 4.10-4)

The DEIR and associated Blasting Report (DEIR, Appendix M) include lengthy discussions and analyses regarding blasting vibration purporting to show that vibration would be barely perceptible, as summarized below:

Grp 21-142

> "Regular drift round blasting would be undetectable below 900 feet depth or distance, and would be barely perceivable at 500 feet depth. The largest longhole blasts, occurring once every three to four days on average, would be undetectable below 1,400 feet depth or distance from a receiver. The maximum ground vibration that the mine would produce to nearby receptors is 0.23 in/s PPV, which considers a rare scenario where a longhole blast occurs directly underneath a receptor at 500 feet depth. The maximum ground vibration of 0.23 in/s PPV is comparable to the vibration level from running a garbage disposal in a house..." (DEIR, page 4.10-58, paragraph 3)

In response, the DEIR incorporates a blasting vibration limit of 0.4 in/sec PPV with no restrictions regarding time of day. In our opinion, the DEIR does not adequately address blasting vibration and understates the project's potential vibration impact for reasons provided below.

4A – Comments on the Blasting Vibration Limit

Grp 21-143

The 0.4 in/sec PPV vibration limit from the DEIR appears to be based primarily on a vibration study performed following an underground nuclear blast in Mississippi in 1964. The first concern is that human responses to this one blast may not be equal to the community response to ongoing perceptible and potentially unpleasant vibration over the 80-year lifespan of this project. Nevertheless, the DEIR references this study as it is described in Bulletin 656 titled "Blasting Vibrations and Their Effects on Structures" published by the U.S. Bureau of Mines (USBM) in 1971. The claim extracted from the USBM document is that "less than 8% of people would complain about blasting activities if the peak particle velocity (PPV) was below 0.4 in/sec." (DIER, Appendix M, page 7, paragraph 3). However, the original chart this is drawn from provides additional context. Figure 3.10 from Bulletin 656 is provided below with dashed lines highlighting the DEIR proposed limit:

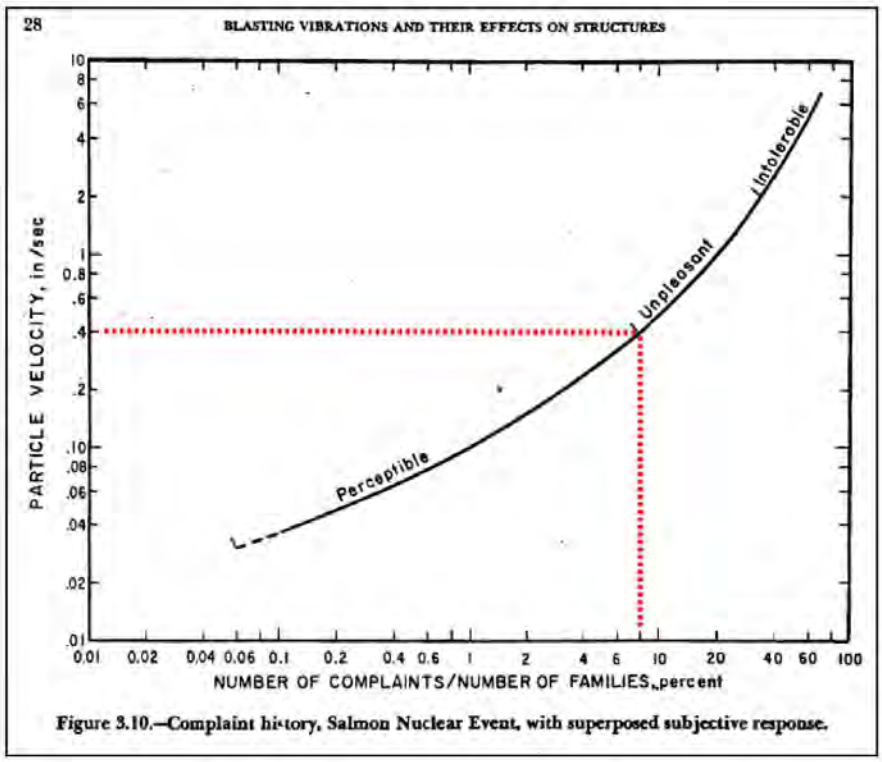

Figure 3.10.—Complaint history, Salmon Nuclear Event, with superposed subjective response.

The proposed limit of 0.4 in/sec. PPV is characterized as clearly perceptible and borderline unpleasant. This description is supported by the Caltrans Transportation and Construction Vibration Guidance Manual (April 2020). Table 21 below, an excerpt from the Caltrans Manual, indicates that blasting vibration of 0.4 in/sec. would be considered "strongly perceptible."

Table 21. Human Response to Blasting Ground Vibration

Average Human Response	PPV (in/sec)
Barely to distinctly perceptible	0.02–0.10
Distinctly to strongly perceptible	0.10–0.50
Strongly perceptible to mildly unpleasant	0.50–1.00
Mildly to distinctly unpleasant	1.00–2.00
Distinctly unpleasant to intolerable	2.00–10.00

The 0.4 in/sec. vibration limit might be appropriate in certain scenarios, such as a short-term event. However, this project involves ongoing mining operations for 80 years. In our opinion, potentially subjecting residents to "strongly perceptible" and borderline "unpleasant" vibration on a regular basis for the rest of their lives should be considered a significant impact. This is particularly true for evening and nighttime operations, which is the subject of our next comment.

4B – Comments on Nighttime Blasting Vibration

The DEIR suggests that the predicted "ground vibration of 0.23 in/s PPV is comparable to the vibration level from running a garbage disposal in a house..." (DEIR, page 4.10-58, paragraph 3). However, the DEIR would currently allow the project to conduct blasting and generate that vibration, equivalent to a garbage disposal, in the bedrooms of residents at night while they are trying to sleep. Despite the project's on-going operations, the DEIR fails to require any restrictions on evening and nighttime blasting vibration operations. This is a serious deficiency of the DEIR.

Grp 21-144

The DEIR and the Blasting Study reference the U.S. Office of Surface Mining and Reclamation and Enforcement (OSMRE) standards to support their analysis. However, the DEIR fails to include crucial guidance from the OSMRE Blasting Guidance Manual (dated March 1987). In the "Citizen Interests" chapter of the OSMRE Manual the following notes on blasting times and schedules is provided:

> "All blasting must take place during daylight hours unless more restrictive times are specified. If night-time blasting is approved by the regulatory authority, it must be based on evidence from the operator that the public will be protected from adverse noise and other impacts." (OSMRE Blasting Guidance Manual, page 114, paragraphs 4 and 5)

The DEIR provides no evidence that the public will be protected from adverse effects from the project's blasting operations. It provides no special consideration and therefore no additional restrictions on blasting vibration during evening and nighttime hours. In our opinion, potentially subjecting residents to "strongly perceptible" and borderline "unpleasant" vibration during evening and nighttime hours would be a significant impact on the community.

#5 – Claim Regarding 20 dB Reduction of Blasting Noise at Portal is Unsubstantiated

Grp 21-145

To evaluate potential noise impacts from blasting noise, the DEIR evaluates noise measurements conducted by Bollard Acoustical Consultants at the Sutter Gold underground mine in Amador County. Those measurements found blasting noise to be 75 dBA, on average, at a distance of 200 feet from the mine portal (DEIR, page 4.10-44, paragraph 5). However, to translate those findings to the Brunswick site of the project, the author assumes that noise at the project site would be reduced by 20 dB compared to the Sutter Gold mine (DEIR, page 4.10-44, paragraph 6). Other than mentioning the difference in orientation and size of the portal, this claim of 20 dB noise reduction is unsubstantiated. Twenty decibels of noise reduction is a substantial change in noise emission. Without further data or evidence to back up this 20 dB claim, the DEIR cannot simply assume these lower noise levels. The DEIR Noise Study states the following:

> "If the 75 dBA L_{max} level collected at Sutter Gold is conservatively reduced by 20 dB to assess blasting noise impacts at the Brunswick site, worst-case maximum noise levels at the nearest receptors would range from 52 to 57 dBA L_{max} on average." (DEIR, Appendix L, page 58, paragraph 4)

However, without the unsubstantiated 20 dB of reduction, blasting noise at the nearest sensitive receptors would be between 72 and 77 dBA. As stated above and in the DEIR, ambient median and "background" noise levels at many sensitive receptors is between 35 dBA and 50 dBA. Thus, the blasting noise could be substantially above the ambient noise levels, by approximately 25 to 40 dB. We would expect such an event to be considered a disturbance, likely resulting in complaints, particularly at night when sleep disturbance would be expected.

The DEIR noise study should be revised to provide evidence for the substantial claim that blasting noise levels at the Brunswick site would be 20 dB quieter than the referenced Sutter Gold mine project. Such a claim must be explained for the public to review and have confidence in the findings of the DEIR. If the claim cannot be substantiated, the potential blasting noise must be adequately mitigated to avoid community disturbance from the excessive noise.

* * *

Should you have any questions, please call.

Best,

SALTER

Jeremy L. Decker, PE
Vice President

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RESUME



Jeremy Decker, PE
Vice President

Mr. Decker has been an acoustical consultant with Salter since 2005. His areas of expertise include environmental noise studies, municipal master planning and noise control policies, architectural noise control, room acoustics, mechanical system noise and vibration reduction, and vibration analyses. He has consulting experience in the development and peer review of environmental noise impact analyses for public, industrial, and other commercial projects.

Project Experience

- Cottonwood Sand & Gravel Mine DEIR Peer Review, San Diego County, CA
- Decker Island Mine, Solano County, CA
- Kern County Oil & Gas DEIR/FEIR/SEIR Peer Review, Kern County, CA
- Southern California International Gateway FEIR Peer Review, Long Beach, CA
- Bay Delta Conservation Plan/California WaterFix FEIR Peer Review, CA
- Redondo Beach Power Plant Noise Impact Peer Review, Redondo Beach, CA
- Caldecott Tunnel 4th Bore Noise Impact Study, East Bay Area, CA
- Kaneohe/Kailua Sewer Tunnel Construction Noise Study, Kailua, HI
- Warner Ranch DEIR Peer Review, San Diego County, CA
- Gateway Valley Construction Noise Impact Study, Orinda, CA
- San Francisco Fire Dept. Water Supply Facility, San Francisco, CA
- FedEx Distribution Center Noise Impact Studies, Various Cities, CA, AZ, TN
- NRG Cogeneration Facility Noise Impact Study, San Francisco, CA
- Fivepoint Amphitheater Noise Impact Study, Irvine, CA
- Kaiser Permanente Construction Noise Study, Oakland, CA
- Saltworks Site EIR, Redwood City, CA
- Egbert Data Center EIR, San Francisco, CA
- Saranap Village EIR, Walnut Creek, CA
- Fresno General Plan Update and EIR, Fresno, CA
- Daly City General Plan Update and EIR, Daly City, CA

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GROUP LETTER 21: ELLISON FOLK, SHUTE MIHALY LAW FIRM/COMMUNITY ENVIRONMENTAL ADVOCATES FOUNDATION

Response to Comment Grp 21-1

This comment is introductory. The commenter generally states that the DEIR is deficient but does not identify any specific deficiencies. Responses to commenter's specific comments are provided below. Comment noted.

Response to Comment Grp 21-2

The commenter states that the DEIR does not accurately describe the project because it does not accurately describe the cleanup of the Centennial Site and uses post-cleanup conditions as a baseline. The commenter is referred to Master Response 4 – Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 21-3

This comment alleges that the DEIR does not properly analyze or mitigate significant environmental impacts, including the design details of engineered fill and geochemistry of waste rock and tailings. Please see Master Response 8 – Mine Waste Characterization. In addition, regarding the commenter's footnote 1, the term "engineered fill" is defined by the DEIR as min[ing] waste, stating that it will be used to create elevated pad areas at the Centennial and Brunswick Industrial Sites. (DEIR p. 4.8-29.)

The comment also refers to a report submitted by David M. Chambers. Please see responses to Group Letter 9.

Response to Comment Grp 21-4

A full analysis of hydrology and potential impacts in the project vicinity begins with the Project Description, including a disclosure of potential impacts during dewatering and treatment (DEIR p. 3-15) and operational dewatering (DEIR p. 3-18); and is followed in detail by Chapter 4.8 Hydrology and Water Quality. (DEIR p. 4.8-1) Careful consideration was given to regional groundwater occurrence in the immediate area, including review of driller logs, seasonal fluctuations in groundwater levels, and recharge each year. Of particular concern to the County and Project Applicant was the potential effect on private domestic wells in the Project Area (DEIR p. 4.8-8.) The private domestic wells that occur in the Wolf Creek and South Fork

Wolf Creek watersheds are primarily located in four distinct areas, as shown on DEIR Figure 4.8-4. In addition to the four main areas, additional areas or isolated wells are located inside or close to the boundaries of the mineral rights where groundwater supply wells are present, as shown on Figure 4.8-4 (See also DEIR pp. 4.8-10 through -12.) Thresholds of significance can be found in the same chapter on page 4.8-36. The analysis indicates that reductions in the water column of 20 percent to 40 percent could cause the production rate of wells to become unstable by incrementally decreasing the water column much more than would occur under existing conditions. The DEIR uses a 100 percent factor of safety as applied to the potential reduction resulting in unstable conditions, such that a criterion of 10 percent of the water column is used to define wells that might be substantially affected by dewatering of the underground mine workings. For thresholds of significance, discussion and mitigation specific to groundwater supplies, recharge, specific wells in the vicinity and groundwater management, please see Mitigation Measure 4.8-2. (DEIR p. 4.8-54 – 4.8-66.)

Please also see Response to Comment Grp 21-110, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Please also see EMKO Environmental, Inc. *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project*. March 2020. (DEIR Appendix K.2); Itasca Denver, Inc. *Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine*. November 2020 (DEIR Appendix K.3); West Yost. *Peer Review of Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the Idaho-Maryland Mine Project, Nevada County, California*. August 27, 2020 (DEIR Appendix K.7); Itasca Denver, Inc. *Groundwater Monitoring Plan, Idaho-Maryland Mine Project*. February 2021 (Appendix K.8); and Rise Grass Valley Inc. *Well Mitigation Plan*. February 2, 2021 (DEIR Appendix K.9).

Response to Comment Grp 21-5

The commenter provides general concerns regarding the DEIR's noise and vibration analysis, ostensibly based on the Salter comment letter, included as Exhibit B to Group Letter 21. For example, with regard to hours of blasting, please see Responses to Comments Grp 21-143 and Grp 21-144. With regard to sleep disturbance analysis, please see Response to Comment Grp 21-130.

County noise standards are not the only standard of significance used for the noise analysis, as the DEIR also considered a substantial increase in ambient noise levels to be a significant increase, even if the noise does not exceed the County noise standard. Please see Response to Comment Grp 12-28.

Regarding the geographic extent of potential noise and vibration impacts, please see Master Response 7 - Location of Future Mining Areas. As noted in Master Response 7, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202, included as Appendix A to the Final EIR), and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft.

Regarding the Centennial Industrial Site, please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 21-6

Regarding clean-up of the Centennial Industrial Site, please see Master Response 4 – Clean-Up Project is a Separate Project Under CEQA. Regarding the concerns about waste rock and mine tailings, please see Master Response 8 – Mine Waste Characterization. Regarding the concern related to a plume cloud, please see Response to Comment Grp 7-95.

Response to Comment Grp 21-7

Regarding the commenter's concerns about the air quality, GHG, and energy effects of the Centennial Site cleanup, please see Master Response 4 – Clean-Up Project is a Separate Project

Under CEQA. Regarding the concern about the construction timeline, please see Master Response 24 – Project Construction Schedule. Regarding project design, CEQA Guidelines sections 15070(b)(1) and 15126.4(a)(1)(A) specifically permit the incorporation of project design features into a project. These project design features are specifically listed in the Project Description and will become conditions of approval of the project's conditional use permit. For example, the applicant's Asbestos, Serpentinite, and Ultramafic Rock Management (ASUR) Plan is described on page 3-20 of Chapter 3, Project Description, of the DEIR. The ASUR is identified as an applicant proposed measure (APM) in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR (see pg. 4.3-65). Chapter 4.3 identifies two more APMs that are hereby incorporated into Chapter 3 of the DEIR for clarification purposes, under the "Aboveground Facilities Construction and Operations" header (pg. 3-20), as follows:

> APM-AQ-1: Exhaust Emission Controls
>
> The following measures, required as project conditions of approval, shall be implemented during construction, operation, and reclamation to reduce exhaust emissions:
>
> - All off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines.
> - Unnecessary construction vehicle idling time shall be minimized. The ability to limit construction vehicle idling time is dependent on the sequence of activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for immediate use. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project shall apply a "common sense" approach to vehicle use such that idling is reduced as much as possible below the maximum of 5 consecutive minutes required by regulation (13 CCR 2449 and 2485). If a vehicle is not required for use immediately or continuously for activities or for other safety-related reasons, its engine shall be shut off.
> - All off-road equipment shall be maintained in accordance with manufacturer's specifications. All equipment shall be checked by a qualified mechanic, and equipment shall be confirmed that it is in proper condition prior to operation.
>
> APM-AQ-2: Surface Fugitive Dust Controls
>
> The following measures, required as project conditions of approval, shall be implemented to reduce surface fugitive dust emissions:
>
> - During construction, operation, and reclamation, all exposed soil surfaces (e.g., unpaved disturbed areas, unpaved parking areas, and unpaved staging areas, and soil piles) shall be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring. As an alternative to watering, inactive soil piles shall be covered to minimize wind erosion.
> - During construction, all on-site roadways shall be paved as soon as possible after grading and any unpaved gravel roads shall be treated with chemical stabilizers in order to control fugitive dust.

The above three APMs are included in the project design and project air quality assessment, required as project conditions of approval, and included in Chapter 4 of the FEIR, Mitigation Monitoring and Reporting Program. Therefore, including a description of all three APMs in the

project description chapter of the EIR is for clarification purposes and does not alter the conclusions of the DEIR.

The commenter also provides other general concerns regarding the DEIR's air quality analysis, health risk assessment and GHG emissions significance threshold, but provides no evidence as to why these analyses are inadequate. Please see Master Response 18 – Air Quality Thresholds; Master Response 19 – NSAQMD Criteria Pollutant Thresholds during Operations; and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Grp 21-8

The commenter asserts that the DEIR did not consider a reasonable range of alternatives. Section 6 of the DEIR considers project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. (See CEQA Guidelines, Section 15126.6(a).) The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. The commenter does not suggest any specific alternative. Comment noted.

Response to Comment Grp 21-9

The commenter asserts that the DEIR does not fully and accurately inform decisionmakers and the public of the environmental consequences of the project, and requests recirculation of the DEIR. However, the comment does not provide any specific example of an issue with the DEIR requiring recirculation. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met. Please see the Introduction chapter of this Final EIR for a more detailed discussion of recirculation criteria, pursuant to CEQA Guidelines 15088.5.

Response to Comment Grp 21-10

The commenter refers to technical comments attached to its comment letter. For responses to the Baseline Environmental Consulting comments, please refer to Responses to Comments Grp 21-107 to Grp 21-128; for responses to the Salter comments, please refer to Responses to Comments Grp 21-129 to Grp 21-145; and for responses to CEA comments, please see Responses to Group Letters 7 and 8. Please also see the following responses to the commenter's specific comments.

Response to Comment Grp 21-11

The commenter asserts that the DEIR's project description is flawed because it does not include the Centennial cleanup project. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The commenter also asserts that the project description is flawed because it improperly uses an adjusted baseline representing post-cleanup conditions on the Centennial Site as the baseline rather than existing conditions. As discussed in Section 1.3 of the DEIR, the baseline for the Centennial Site was adjusted because the proposed project could not possibly impact that site unless and until the DTSC cleanup project has already been completed. As such,

presenting the project's impacts to the Centennial Site based on the pre-DTSC Project conditions would be misleading to the public and decision-makers and would not represent the actual project impacts. This adjusted baseline is appropriate under CEQA Guidelines Section 15125(a)(1) and is supported by substantial evidence in the record. The commenter also asserts that the DEIR's project description is flawed because it does not adequately describe the duration of the required permits or the duration of construction and phasing of mining and exploration activities over the entire permit period. However, the commenter does not provide any specifics on what information is not provided. The DEIR's project description details all required permits, explains that the term of the project would be for 80 years, and provides sufficient detail on construction and other project activities. Also see Master Response 24 - Project Construction Schedule.

Response to Comment Grp 21-12

The commenter summarizes details regarding the DTSC Cleanup Project and the Idaho-Maryland Mine Project and does not address the adequacy of the DEIR. Comment noted.

Response to Comment Grp 21-13

The commenter asserts that the DEIR does not include a proper description of the environmental setting because it uses an adjusted baseline for the Centennial Site. Please see Master Response 4 – Clean-Up Project is a Separate Project Under CEQA.

Regarding the possibility that the Centennial Site will not be cleaned up and therefore not be available for placement of engineered fill, the commenter further asserts that the DEIR "ignores this uncertainty, simply assuming the future cleanup will occur." However, the DEIR explicitly addresses this situation and states "[i]f the separate DTSC cleanup project is not approved by DTSC and completed within the term of the Idaho-Maryland Mine Project use permit, engineered fill would be placed on the Brunswick site, but not the Centennial site, and the remainder would be hauled to local and regional markets." (DEIR, p. 1-3.) Accordingly, the DEIR did not ignore the possibility of not placing material on the Centennial Site, but specifically addressed and analyzed impacts under that possible scenario.

The commenter further argues that the DEIR cannot use the adjusted baseline as the "sole" baseline because there is a possibility the cleanup may not occur, and requests analysis based on an existing conditions baseline. The commenter mistakenly references CEQA Guidelines Section 15125(a)(2), for "future conditions" baselines, but the DEIR relied on CEQA Guidelines Section 15125(a)(1), which allows use of a baseline consisting of "conditions expected when the project becomes operational." In this case, it is reasonably expected that the DTSC cleanup project will be complete when the project becomes operational.

Response to Comment Grp 21-14

The commenter asserts that the DEIR is flawed because it did not analyze the impacts of transporting 1.6 million tons of mine waste from the project site. However, the commenter mischaracterizes the circumstances that would occur if the Centennial Site were not available for fill placement. The material that would have been placed on the Centennial Site was already analyzed by the DEIR as being transported from the Brunswick Site to the Centennial Site. Thus, the DEIR already analyzed impacts from the transport of that material. However, if the Centennial Site were not available for placement of fill material when the project commences, that material would be transported to local construction aggregate consumers rather than the Centennial Site. The commenter asserts that the air quality, GHG emissions, energy use, and noise impacts of

transporting the fill material to regional construction were not addressed in the situation where the Centennial Site is not available for placement of fill material. However, the impacts of transporting material to the regional construction market was already addressed in the DEIR.

The DEIR analyzed the impacts of off-site hauling of rock material to the construction aggregate market, starting in 2033; however, it was assumed in the DEIR that prior to 2033, rock material would be placed on the Brunswick engineered fill pile and Centennial Site engineered fill pile. Based on public comments regarding the air quality and GHG impacts associated with hauling of rock material to construction aggregate purchasers earlier than anticipated, the applicant has agreed to a condition of approval that would require the applicant to use electric trucks for any offsite sale or transport of waste rock or sand tailings from the Brunswick site (other than to the Centennial Site) if such transport occurs prior to 2033. Hauling of material to offsite locations for use as construction aggregate starting in 2033 was already assumed in the DEIR's analysis; thus, the emissions impacts associated with this activity are already included in the DEIR, regardless of whether the Centennial Site is available for placement of fill material. The below condition would ensure that the project would not have greater air quality and GHG emissions impacts or energy use impacts than analyzed under the DEIR even if the Centennial Site is not available for placement of engineered fill. The text of the condition of approval is provided below:

> COA 4: In the event that sand tailings or waste rock material is transported from the Brunswick Site prior to 2033 to locations other than the Centennial Site, all transport of such material shall be accomplished using electric vehicles.

Further, noise impacts from transport of material to regional construction aggregate markets were already addressed in the DEIR's noise analysis. The commenter does not explain how the unavailability of the Centennial Site for fill placement could result in greater noise impacts than were already analyzed by the DEIR. Regarding wasteful energy, the commenter does not explain how transport of aggregate that would be used in construction projects would cause wasteful use of energy or fuel. Notably, the new condition of approval above requiring use of electric vehicles for any sand tailings and waste rock transported from the mine prior to 2033 would provide an environmental benefit in terms of air quality and energy use, as the vehicles would be electric rather than powered by diesel.

Response to Comment Grp 21-15

The commenter asserts that the Centennial Site DTSC Cleanup Project should be analyzed in the DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-16

The commenter asserts that the Centennial Site DTSC Cleanup Project should be analyzed in the DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-17

The commenter asserts that the Centennial Site DTSC Cleanup Project should be analyzed in the DEIR. Please see Master Response 4 -Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-18

The commenter asserts that the Project Description is not stable and therefore the DEIR is inadequate because the County Conditional Use Permit (CUP) would last for 80 years but other agency permits such as National Pollutant Discharge Elimination System (NPDES) permits

typically have shorter terms and need to be renewed at regular intervals. The commenter asserts that lack of correlation between the CUP term and the term of other permits, along with the DEIR's failure to discuss this discrepancy is a deficiency that makes the project description inadequate. However, the commenter does not explain how the difference in permit terms would cause a new significant environmental impact or would lead to more severe environmental impacts. Rather, the DEIR discloses that other state and federal agencies have authority over ancillary permits required for the project, and requires that the applicant obtain those permits as necessary for project operations. Those agencies' continuing oversight of the project, including the need to renew such permits at various intervals, adds an additional layer of protection guaranteeing project compliance with applicable laws and regulations. The commenter does not offer any statutory, regulatory or case law authority for its argument that the permit terms should be identical, as there is no such requirement. Rather, counties routinely issue use permits, and other approvals (such as building permits) that require continuing oversight of other agencies and the need to renew ancillary permits during the life of that use permit or structure. Discussion of the various permits terms is not required by CEQA, and does not directly relate to the existence or severity of an environmental impact. Moreover, while the DEIR provides a thorough analysis and disclosure of the project and its related impacts, including every detail requested by the commenter, where those details are not necessary for public disclosure or analysis of impacts, would create an unreasonably lengthy EIR, and is not required by CEQA. As stated by California Courts: "The need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d at p. 406.)

Response to Comment Grp 21-19

The commenter asserts that the Project Description is "shifting" and inadequate because the groundwater model relied on a 25-year hydrogeologic model to assess groundwater impacts from project implementation, while the project CUP term is proposed as 80 years. The 25-year model is based on known locations of mineralized gold ore and represents the underground location of where mining would occur during the first 25 years of mine operation. For subsequent years of mine operation, the precise location of mining would be determined by further geologic exploration that would be conducted during mine development and cannot be known until additional mining and exploration is completed. However, Sensitivity Scenario 6 used in the groundwater model considered the significant expansion of mining in areas with potential for mineralization, as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. This groundwater model scenario represents the reasonably foreseeable location of where future mining would likely take place after the initial 25-year period. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks.

As stated in Response to Comment Grp 7-82, the groundwater flow model would be updated periodically after dewatering commences and additional groundwater level data is collected to evaluate dewatering impacts. New groundwater level data and updated modeling would

incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates.

The commenter asserts that the DEIR does not disclose that mining may progress beyond the area analyzed for the initial 25 years; however, the DEIR Project Description states explicitly that "[t]he project would also involve underground mining within an approximately 2,585-acre mineral rights boundary owned by the applicant," which discloses that underground mining could occur within this 2,585-acre area, not just the smaller area analyzed for the initial 25-year groundwater model analysis. (DEIR, p. 3-1.)

Importantly, based on public comments regarding the geographic scope of underground mining, the applicant will be subject to a condition of approval that will reduce the area in which it is allowed to conduct underground mining during the term of the 80-year permit to a smaller subset of the 2,585-acre mineral rights boundary, as discussed in Master Response 7 - Location of Future Mining.

While the commenter asserts that the DEIR does not disclose where future mining would occur, the DEIR does in fact disclose that underground mining may occur within the 2,585-acre mineral rights boundary below a depth of 500 feet, subject to the further limitation discussed in Master Response 7 - Location of Future Mining Areas. As stated on page 1-2 of the DEIR, one of the listed project components is "Underground mining at a depth of 500 feet or more in areas underlying the mineral rights properties." The groundwater model's analysis of the first 25-years of mining and its impact on groundwater impacts, along with analysis of an additional 65-years of potential future mining locations, does not make the project description unclear or unstable, as the DEIR is explicit that underground mining could occur within the mineral rights area.

Response to Comment Grp 21-20

The commenter asserts that the DEIR's project description is inconsistent because it states that construction would take 18 months, while the air quality analysis assumes that construction would occur over a 12-month period. As discussed in Master Response 24 - Project Construction Schedule, the air quality analysis assumed a 12-month construction period that overlapped some construction activities that may be done sequentially, in order to assess the most conservative air emissions impacts scenario. The Project Description is explicit in its disclosure that project construction activities would likely take place over 18 months; however, the air quality analysis takes a more conservative approach in order to ensure that air quality emissions from construction are not underestimated due to the assumption that activities will be staggered rather than overlapping. The analytical approach used for the air quality analysis used to provide a conservative impact analysis does not in any way make the Project Description inconsistent or unstable. Please see Master Response 24 - Project Construction Schedule.

Response to Comment Grp 21-21

The commenter asserts generally that the DEIR is insufficient and fails to provide accurate information about project impacts or appropriate alternatives and mitigation measures. The comment provides no specific information on its general statements. The commenter's specific comments are addressed below in subsequent responses to comments.

Response to Comment Grp 21-22

The commenter asserts generally that the DEIR does not adequately evaluate the impact of dewatering on residences and businesses in the project vicinity. Contrary to the commenter's assertion, the DEIR provides extensive analysis of groundwater, water quality and hydrology impacts in Chapter 4.8 of the DEIR and appendices K.1 through K.9, including analysis of impacts to nearby groundwater wells. Please see Master Response 14 - Adequacy of Groundwater Model and Response to Comment Grp 21-110.

Response to Comment Grp 21-23

The commenter asserts that the DEIR is inadequate because baseline groundwater levels have not been established. However, the DEIR includes a detailed groundwater model that included decades of groundwater level measurements to establish the regional groundwater level baseline and to calculate groundwater impacts due to dewatering based on those levels and the expected project dewatering activities. In addition, to mitigate dewatering impacts, the DEIR requires a groundwater well monitoring plan that includes placement of a network of groundwater monitoring wells to collect additional data over a 12-month period before dewatering of the mine commences. Further, the applicant has agreed to an additional condition of approval requiring the applicant to offer individual groundwater well monitoring for all owners of wells within the expected 1-foot drawdown area as predicted by the groundwater model. For those well owners that agree to allow individual monitoring of their wells, this additional data will be used to ensure that any individual well impacts are mitigated. The groundwater baseline data, groundwater model, impact conclusions and proposed mitigation measures have been independently reviewed by the County's independent experts, who provided input on the model and the mitigation, finding that that the analysis and mitigation is sufficient after incorporation of their independent expert input. Please also see Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 21-24

The commenter asserts that the DEIR provides no evidence that the hydrologic analysis covers the full geographic scope of the project and the geographic scope of the expected drawdown impacts, when concluding that the drawdowns will be generally within the mineral rights boundary. However, the groundwater model included analysis of an area much larger than merely the mineral rights boundary or the mine itself. As stated on page x of Appendix K.3 of the DEIR "Using the hydrogeologic conceptual model and the available data, Itasca developed a 3-D finite element numerical groundwater flow model of the Mine and the surrounding area." Contrary to the commenter's assertion, the groundwater model's conclusion that groundwater impacts would be limited to areas generally within the mineral rights boundary is based on expert analysis and use of an industry-standard groundwater model, not upon a mere assumption that impacts would be limited to a certain geographic area. The groundwater baseline data, groundwater model, impact conclusions and proposed mitigation measures have been independently reviewed by the County's independent experts, who provided input on the model and the mitigation, finding that that the analysis and mitigation is sufficient after incorporation of their independent expert input. Please also see Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 21-25

The commenter asserts that the groundwater model and proposed monitoring well network does not account for potential impacts at individual domestic wells and summarizes the related

comment from Baseline (Comment Grp 21-119). Please see Response to Comment Grp 21-119. Note that the applicant has also agreed to an additional condition of approval requiring the applicant to offer individual groundwater well monitoring for all owners of wells within the expected 1-foot drawdown area as predicted by the groundwater model. For those well owners that agree to allow individual monitoring of their wells, this additional data will be used to ensure that any individual well impacts are mitigated. Please also see Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 21-26

The commenter asserts that no impact threshold has been set for groundwater drawdown impacts, and then inconsistently argues that the threshold used by the DEIR in Mitigation Measure 4.8-2(b) (10 percent or greater reduction of the water column of any well), is arbitrary and is not based on substantial evidence. This comment mirrors Comment Grp 21-117 provided by Baseline. Please see Response to Comment Grp 21-117 for a full explanation of this threshold. The selection of the 10% reduction as a threshold of significance is discussed in Section 3.2.1, page 80, of Appendix K.2 of the DEIR, and this threshold was deemed appropriate by groundwater experts, including the County's independent experts. As discussed in CEQA Guidelines Section 15064(b)(2), CEQA lead agencies have discretion to establish appropriate impact thresholds based on substantial evidence. As discussed in Response to Comment Grp 21-117, this threshold was established based on substantial evidence and reviewed by the County's independent experts. Note that the applicant has also agreed to an additional condition of approval requiring the applicant to offer individual groundwater well monitoring for all owners of wells within the expected 1-foot drawdown area as predicted by the groundwater model. For those well owners who agree to allow individual monitoring of their wells, this additional data will be used to ensure that any individual well impacts are mitigated. To the commenter's assertion that some individual wells may barely be functional, such that a drawdown of less than 10 percent of the existing well water column would result in impacts due to poor well function, the additional condition of approval agreed to by the applicant will provide additional data on individual wells that are barely operational, that would trigger the applicant's obligation to mitigate said well impacts under Mitigation Measure 4.8-2(b) and under General Plan Policy 17.12, if said wells experienced a significant impact due to dewatering.

Response to Comment Grp 21-27

The commenter asserts that the DEIR's analysis is inadequate because it relies on a flawed groundwater model. In making its arguments, the commenter relies on arguments from the Baseline comments Grp 21-111 and Grp 21-112. Please see Responses to Comments Grp 21-111 and Grp 21-112, and Master Response 14 - Adequacy of Groundwater Model. As discussed in the referenced responses to comments and Master Response, the groundwater model relies on industry standard software modelling, and uses conservative assumptions to model groundwater conditions and project impacts. The model analysis was peer-reviewed by the County's independent expert who provided input on the model, analysis, and mitigation measures. Thus, the information provided in the DEIR on groundwater impacts constitutes substantial evidence.

Response to Comment Grp 21-28

The commenter asserts that the DEIR does not provide explanation on how drawdown impacts would be determined in connection with seasonal fluctuations in groundwater wells. This comment mirrors the Baseline comment Grp 21-117. Please see Response to Comment Grp 21-117.

Further, the additional condition of approval agreed to by the applicant to offer individual monitoring of groundwater wells within the expected 1-foot drawdown area will provide additional data on individual wells, as data is collected (including data on seasonal fluctuations) over a 12-month period prior to initiation of dewatering activities. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 21-29

The commenter asserts that the groundwater model used in the DEIR does not account for the groundwater depression that will be created by constant drainage from the existing mine workings, and further does not account for existing drainage from existing mine workings. This comment is a summary of points argued in Baseline's comments Grp 21-113 and 21-114. Please see Responses to Comments Grp 21-113 and Grp 21-114, and Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Grp 21-30

The commenter asserts that the Groundwater Monitoring Plan required by Mitigation Measure 4.8-2(a) is flawed because it does not include monitoring of individual groundwater wells, and rather relies on a network of groundwater monitoring wells. This comment summarizes the comments made in Baseline's comment Grp 21-119. Please see Response to Comment Grp 21-119. Further, the additional condition of approval agreed to by the applicant to offer individual monitoring of groundwater wells within the expected 1-foot drawdown area will provide additional data on individual wells, as data is collected (including data on seasonal fluctuations) over a 12-month period prior to initiation of dewatering activities. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 21-31

The commenter summarizes its previous comments and generally asserts that the DEIR's conclusion on the extent of dewatering impacts is incorrect because the groundwater model is flawed and that the mitigation is inadequate. Please see Responses to Comments Grp 21-21 through Grp 21-30 above, and also see Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 21-32

The commenter asserts generally that the mitigation measures provided to mitigate the project's impacts to groundwater supply are deficient. This comment does not identify any specific deficiencies in the mitigation measures. The commenter's specific assertions are addressed in the responses below. Comment noted.

Response to Comment Grp 21-33

The commenter asserts that the DEIR's groundwater supply mitigation measures are improperly deferred because under the groundwater monitoring plan, additional data will be collected prior to dewatering and then during dewatering to anticipate any unexpected impact to groundwater wells. Specifically, the commenter alleges that the mitigation is inadequate because the DEIR fails to include performance criteria for the mitigation measures, does not include factual support for its 10 percent impact threshold, and does not accurately describe existing conditions. With regard to the commenter's assertion that no evidence exists to support the 10 percent threshold, please see Response to Comment Grp 21-26. With regard to the commenter's assertion that the mitigation measures are improperly deferred, in the case *Center for Biological Diversity v.*

California Department of Conservation, etc. (2019), the court explains that "[g]enerally, it is improper to defer the formulation of mitigation measures…However, an exception to this general rule applies when the agency has committed itself to specific performance criteria for evaluating the efficacy of the measures to be implemented in the future, and the future mitigation measures are formulated and operational before the project activity that they regulate begins." (36 Cal.App.5th 210, 239.) The court determined both conditions were met in that case and upheld the deferred mitigation measures. Similarly, the mitigation measures presented in the DEIR for mitigation of groundwater supply impacts require compliance with specific performance standards and also require implementation prior to dewatering activities. Specifically, Mitigation Measure 4.8-2(a) requires establishment of a Groundwater Monitoring Plan that will collect data for a 12-month period prior to dewatering; Mitigation Measure 4.8-2(b) requires immediate replacement of water supply for any water well that is impacted by the project; and Mitigation Measure 4.8-3(c) requires that the Project Applicant connect 30 properties to Nevada Irrigation District potable water supply prior to dewatering activity, even though only 7 wells are expected to be impacted, based on quantitative groundwater modeling. These mitigation measures include specific performance standards that ensure any impacts will be adequately mitigated. Moreover, the commenter ignores the fact that the DEIR's conservative analysis anticipates that only 7 wells will be impacted, provides replacement water prior to dewatering to those 7 wells and 23 other properties that are not anticipated to be impacted, and further, that the Groundwater Monitoring Plan and replacement requirement in Mitigation Measures 4.8-2(a) and 4.8-2(b) are provided as an extra layer of security for unanticipated impacts to wells that were shown by the groundwater model not to experience significant impacts. As such, the mitigation for impacts anticipated by the DEIR has already been fully formulated and is not deferred, due to the requirement that water connections be provided to the 7 wells expected to have impacts (and 23 additional properties) prior to dewatering. The additional Groundwater Monitoring Plan and water replacement mitigation is provided to ensure mitigation of unanticipated impacts that are beyond the impacts actually predicted by the DEIR, and detailed performance standards are provided in Mitigation Measures 4.8-2(a) and 4.8-2(b) and in Appendices K.8 (Groundwater Monitoring Plan) and K.9 (Well Mitigation Plan). Please see Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Further, the additional condition of approval agreed to by the applicant to offer individual monitoring of groundwater wells within the expected 1-foot drawdown area will provide additional data on individual wells, as data is collected over a 12-month period prior to initiation of dewatering activities.

Response to Comment Grp 21-34

The commenter asserts that Mitigation Measure 4.8-2(c) is inadequate in providing water supply to 30 properties because the commenter asserts that the DEIR has no evidence that the dewatering impact will be limited to 30 properties. However, the DEIR actually concludes that dewatering will only significantly impact 7 wells, and the requirement to connect 30 properties goes beyond what is required to mitigate the project's impact. (See DEIR Impact 4.8-2.) The commenter cites *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 866, for the proposition that courts will not defer to agency conclusions about effectiveness of mitigation where there is no evidence in the record showing that it will be effective. However, the DEIR contains voluminous evidence documenting the DEIR's conclusion that only 7 groundwater wells will be significantly impacted (see DEIR Chapter 4.8, and Appendices K.2, K.3, K.7, K.8, K.8 and K.9), includes a comprehensive Groundwater Monitoring Plan to monitor groundwater levels in the case that unanticipated significant impacts occur to wells other than the 7 wells, and

includes a strict requirement that water supply be provided in case unanticipated significant impacts occur to other wells beyond the 30 for which replacement water supply is already provided. The commenter summarizes comments from Baseline comment Grp 21-119 in describing the actions that Baseline believes are necessary to analyze and mitigate groundwater impacts. Please see Response to Comment Grp 21-119.

Response to Comment Grp 21-35

The commenter asserts that Mitigation Measure 4.8-2 must be revised to include the mitigation elements proposed for the 1996 Emperor Gold project, and references Exhibit H to its comment letter. Please see Master Response 13 - Historic Hydrogeologic Assessments.

Response to Comment Grp 21-36

The commenter asserts that the project is inconsistent with General Plan Policy 17.12 because it will threaten water supplies in the project area. However, the DEIR specifically addresses General Plan Policy 17.12 (see DEIR p. 4.8-66) and concludes that the project is consistent with the General Plan Policy's requirement to replace any water supply impacted by mining activities, through implementation of Mitigation Measure 4.8-2(c), which requires replacement water supply for 30 properties. Further, to eliminate concern over groundwater well impacts that are not anticipated by the DEIR's analysis, Mitigation Measure 4.8-2(b) specifically incorporates the General Plan Policy 17.12 requirement for water replacement for unanticipated impacts to wells beyond the 30 properties for which replacement water is already being provided. As such, the DEIR provides substantial evidence that the project is in compliance with General Plan Policy 17.12.

Response to Comment Grp 21-37

The commenter generally asserts that the DEIR did not fully evaluate the project's impacts to water quality due to construction, dewatering discharge, erosion and sedimentation and placement of cemented-paste backfill. Contrary to the commenter's assertion, the DEIR fully analyzes impacts to water quality related to the project's dewatering discharge, construction, fill placement, erosion and sedimentation and use of cemented-paste backfill in Chapter 4.8-1 of the DEIR. Please also see Master Response 35 - Discharge to South Fork Wolf Creek. The commenter references comments from David M. Chambers as support for its arguments. Please see the separate responses to comments Grp 8-174 to Grp 8-200 with regard to responses to comments from David M. Chambers. The commenter asserts that no analysis of water quality and the project's ability to meet water quality standards has been performed; however, this is incorrect. For example, see Appendix K.4 which includes analysis of the project's proposed water treatment plant, and Appendix K.2 which includes groundwater quality analysis. Additionally, please see Master Response 8 - Mine Waste Characterization. With regard to the commenter's assertion that the DEIR's reliance on regulatory permitting requirements is inappropriate, the CEQA Guidelines state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards. (CEQA Guidelines Section 15126.4.) The DEIR's incorporation of water quality permit requirements from the Regional Water Quality Control Board (RWQCB) (see Mitigation Measures 4.8-1(a) through 4.8-1(e)) provides adequate mitigation for the referenced water quality impacts, as the permit requirements apply before project activities can commence, and the RWQCB's permit process includes strict regulatory requirements and performance standards, as outlined in the mitigation measures. Moreover, the commenter is

incorrect in asserting that the DEIR simply relies on a "trust us" approach and provides no analysis of water quality impacts. The potential for water quality impacts is addressed in detail in the DEIR and Appendices, for every aspect of the project, including analysis of existing water quality, mine water discharge treatment, erosion controls, chemical properties of historic and expected mine waste, and analysis of mitigation.

Response to Comment Grp 21-38

The commenter asserts that the DEIR is deficient because the conditional use permit is proposed for a term of 80 years; however, the likely term of the project's water quality permits would be shorter and therefore require renewals of those permits. This comment mirrors the arguments made in comment Grp 21-18 above. Please see Response to Comment Grp 21-18. The commenter also asserts that the DEIR should be revised and recirculated due to flaws in the groundwater supply and groundwater quality impact analyses. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met (please refer to Chapter 1 of this Final EIR for more discussion on this point).

Response to Comment Grp 21-39

The commenter generally asserts that the DEIR's noise analysis is inadequate and summarizes noise generating activities at the project site. The commenter also asserts that operational hours for tunnelling and blasting were not disclosed in the DEIR; however, as stated on page 4.7-28 of the DEIR, "[b]lasting activities are proposed to take place twice daily with blasting between shifts at 7AM and 7PM with 3 to 4 drift rounds blasted every 12 hours between shift changes and longhole blasts of approximately 3,300 tons of rock taking place once every 3-4 days." Further, as described in the PBS Technical Report, minor blasting (such as misholes in drift rounds) could be done periodically during work shifts but would be only a single hole per delay versus the four assumed in the PBS Technical Report for drift round blasting and consequently would result in only 25% of the vibration produced by drift round blasting. As such, contrary to the commenter's assertion, the hours of operation for blasting activities are disclosed in the DEIR, and blasting would typically occur at 7AM and 7PM, with some minor blasting at other hours, including nighttime hours.

Response to Comment Grp 21-40

The commenter generally asserts that the DEIR does not properly analyze or disclose the project's noise impacts. No specific deficiencies are identified in this comment; therefore, no further response is necessary.

Response to Comment Grp 21-41

The commenter asserts that the DEIR's noise analysis is deficient because the DEIR only analyzed project noise in comparison to County noise standards and did not analyze whether the project would result in a significant increase in ambient noise conditions regardless of the County standards. The commenter cites the *King and Gardiner Farms, LLC v. County of Kern* case and *Oro Fino Gold Mining Corporation v. County of El Dorado* case for the proposition that an EIR must analyze the increase in noise above ambient caused by a project rather than solely the County noise standards. However, the commenter is factually incorrect about the DEIR's noise analysis, as the County noise standards are not the only standard of significance used for the noise analysis. The project's DEIR also considered a substantial increase in ambient noise levels

to be a significant increase, even if the noise does not exceed the County noise standard. Please see Chapter 4.10.3, Table 4.10-5 of the DEIR, and Response to Comment Grp 21-133.

Response to Comment Grp 21-42

The commenter asserts that the DEIR did not examine the project's potential to generate nighttime noise and should analyze potential for sleep disturbance. Please See Response to Comment Grp 21-130.

Response to Comment Grp 21-43

The commenter restates its previous comment that the DEIR did not consider changes above ambient noise levels and only considered County noise standards. This is factually incorrect, as the DEIR analyzed impacts from noise increases that are still below County noise standards. Please see Chapter 4.10.3, Table 4.10-5 of the DEIR, and Response to Comment Grp 21-133.

Response to Comment Grp 21-44

The commenter asserts that the DEIR needs to analyze noise and vibration impacts over the entire mineral rights area. The DEIR analyzed noise impacts from all noise generating sources; however, the commenter is incorrect that tunnelling and blasting would be a noise generating activity throughout the entire mineral rights area. As opposed to vibration, audible noise from underground blasting can only propagate to surface from through the mine tunnels and shafts. Therefore, noise impacts from blasting are relative to a receptor's proximity to the shaft headframes at the Brunswick site and not the location of the underground workings. As stated on page 4.10-44 of the DEIR, the noise from blasting is less than significant even for the closest receptors to the Brunswick shaft headframe.

With regard to vibration impacts throughout the mineral rights area, while most blasting would take place at 1,000 feet below surface or deeper, a condition of approval has been added to the FEIR to limit blasting to 500 feet below the surface and deeper. Contrary to the commenter's assertion, the DEIR did not limit analysis of vibration impacts to only the Centennial or Brunswick sites; rather, the analysis modeled vibration impacts at multiple locations and under varying scenarios. (See DEIR Chapter 4.10-4.) As discussed in Chapter 4.10-4 of the DEIR and the PBS Technical Report, a maximum of 0.23 inches per second vibration is modelled where a longhole blast could occur directly beneath a receptor at 500 feet depth. Notwithstanding the rarity of this situation, such a blast might occur every three or four days between shift changes (7AM and 7PM) and would last for only seconds. At 500 feet depth and a horizontal offset of 1,400 feet, such a longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Regular drift round blasting, occurring approximately twice daily over several seconds, is modelled to result in a maximum of 0.14 inches per second vibration at a depth of 500 feet directly beneath a receptor. Note that the 0.14 inches per second vibration that would occur at a receptor if blasting took place 500 feet directly below that receptor is less than the 0.40 inches per second vibration that the DEIR sets as the threshold below which there are "No significant concerns about public annoyance." (DEIR p. 4.10-22.) At 500 feet depth and a horizontal offset of 900 feet, a drift round blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Therefore, the DEIR appropriately considers vibration impacts to be less than significant after mitigation.

Response to Comment Grp 21-45

The commenter asserts that the DEIR is inadequate because it mistakenly mischaracterizes project operational noise sources as construction noise sources and therefore assumes that those



operations are exempt from County noise standards. The commenter implies that tunnelling and blasting may be considered "construction" noise sources by the DEIR rather than operational noise sources, such that the DEIR assumed that they are exempt from County noise standards. However, this is incorrect, as tunnelling and blasting were considered to be operational noise sources by the DEIR. (See DEIR Chapter 4.10-3.) Moreover, despite the fact that construction noise is considered exempt under the County Code (County Code Section L-II 4.1.7.D.8), the DEIR compared all construction noise sources to the applicable County noise standards and determined that some construction noise sources were temporarily significant and unavoidable despite the County Code construction noise exemption. (See DEIR p. 4.10-30.)

Accordingly, the DEIR appropriately categorized project activities as construction or operational activities, respectively. However, even if such activities were mischaracterized (which they are not), the DEIR compared construction activities to the County noise standards despite the construction noise exemption; thus, the DEIR contains an adequate analysis of noise impacts based on substantial evidence.

Response to Comment Grp 21-46

Please see Response to Comment Grp 21-45.

Response to Comment Grp 21-47

The commenter implies that the DEIR concludes that the impacts analyzed in Impact 4.10-2 of the DEIR were found to be less than significant because the County relied on the County Code's construction noise exemption. The commenter is confused about the conclusions of the DEIR, as the DEIR cites the County Code construction noise exemption for informational purposes, but ultimately concludes that the construction noise impact is "significant and unavoidable" despite incorporation of feasible mitigation due to the construction noise experienced at 8 receptors due to the potable water pipeline construction. (See DEIR Table 4.10-11; DEIR p. 4.10-30.) The commenter states that the impact conclusion should be changed to "significant and unavoidable" on page 4.10-30; however, the impact conclusion is already significant and unavoidable, despite incorporation of feasible mitigation.

Response to Comment Grp 21-48

The commenter asserts that operational hours for tunnelling and blasting were not disclosed in the DEIR; however, as stated on page 4.7-28 of the DEIR, "[b]lasting activities are proposed to take place twice daily with blasting between shifts at 7AM and 7PM with 3 to 4 drift rounds blasted every 12 hours between shift changes and longhole blasts of approximately 3,300 tons of rock taking place once every 3-4 days." Further, as described in the PBS Technical Report, minor blasting (such as misholes in drift rounds) could be done periodically during work shifts but would be only a single hole per delay versus the four assumed in the PBS Technical Report for drift round blasting and consequently would result in only 25% of the vibration produced by drift round blasting. As such, contrary to the commenter's assertion, the hours of operation for blasting activities are disclosed in the DEIR, and blasting would typically occur at 7AM and 7PM, with some minor blasting at other hours, including nighttime hours.

As opposed to vibration, audible noise from underground blasting can only propagate to surface from through the mine tunnels and shafts. Therefore, noise impacts from blasting are relative to a receptor's proximity to the shaft headframes at the Brunswick site and not the location of the underground workings. As stated on page 4.10-44 of the DEIR, the noise from blasting is less

than significant even for the closest receptors to the Brunswick shaft headframe. Notably, the DEIR states that "[t]he range of predicted worst-case blasting noise levels of 52 to 57 dBA Lmax is below the daytime, evening, and nighttime dBA Lmax criteria at the nearest receptors." (DEIR p. 4.10-45.) As such, the commenter's assertion that nighttime blasting was not analyzed and would result in significant impacts not disclosed in the DEIR is incorrect. Noise impacts from blasting at all hours were disclosed in the DEIR and found to be less than significant after mitigation. (Id.)

Response to Comment Grp 21-49

The commenter asserts that the DEIR is deficient because it does not evaluate noise impacts associated with the separate Centennial Site Cleanup project under the authority of DTSC. The Centennial Site Cleanup project is separate from the Idaho-Maryland Mine Project and its impacts are therefore not required to analyzed in the project's DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-50

The commenter asserts that the DEIR failed to adequately analyze noise impacts from placement and compaction of engineered fill and cites a separate comment from Salter (Comment Grp 21-131) for the proposition that the DEIR underestimates noise impacts by up to 14 dB, resulting in significant impacts at 11 receptors that were not disclosed by the DEIR. Please see Response to Comment Grp 21-131.

Response to Comment Grp 21-51

The commenter asserts that the DEIR underestimates the project's impacts because it compares project-related noise to ambient conditions near roadways. Please see Response to Comment Grp 21-133. The commenter also states that the DEIR did not consider changes above ambient noise levels and only considered County noise standards. This is factually incorrect, as the DEIR analyzed impacts from noise increases that are still below County noise standards. Please see Chapter 4.10.3, Table 4.10-5 of the DEIR, and Response to Comment Grp 21-133.

Response to Comment Grp 21-52

The commenter asserts that the DEIR is inadequate because it incorporates noise reducing project design features. As discussed in Responses to Comments Grp 21-135 to Grp 21-141, the Project Design incorporates numerous noise-reducing features such as placing equipment within enclosed buildings and use of silencers. The noise analysis was based on the implementation of these features, and as part of the Project Description, the County has authority to require that such features are installed during project construction and implementation. The commenter asserts that each feature needs to be specifically identified; however, CEQA does not require every piece of equipment to be specifically identified, only that the equipment be commercially available. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.). Furthermore, Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded, operations shall cease until additional engineering controls can be implemented as needed. The required mitigation measure will therefore ensure that any necessary engineering controls for reduction of noise are implemented for the project.

Nonetheless, to clarify that the noise reducing technology discussed in Chapter 4.10 of the DEIR is implemented through an enforceable mechanism, the County will require the following condition of approval be imposed as part of project approval:

> COA 7: The applicant shall be required to install all noise reducing project features and equipment included in the Project Description, and assumed in the noise impact analysis included in Chapter 4.10 of the DEIR. While the applicant is not required to use the specific brands and models assumed in the DEIR, the applicant shall be required to demonstrate that the noise reducing project features and equipment actually installed as part of the project achieve the same or better noise reduction as was assumed in the DEIR. The applicant shall be required to provide specifications on all installed noise reduction features and equipment to the County to verify that the noise reductions comply with the assumptions in the DEIR. Further, the County will verify and enforce use and operation of noise reduction equipment and features through implementation of Mitigation Measure 4.10-3.

Response to Comment Grp 21-53

This comment summarizes the arguments made by Salter in Comments Grp 21-143 and Grp 21-144. Please see Responses to Comments Grp 21-143 and Grp 21-144.

Response to Comment Grp 21-54

This comment summarizes the arguments made by Salter in Comment Grp 21-145. Please see Response to Comment Grp 21-145.

Response to Comment Grp 21-55

The commenter asserts that the DEIR needs to include more analysis of the existing environmental contamination conditions at the Centennial Site, in the event that the DTSC cleanup project is not completed. Section 1.3 of the DEIR provides an overview of conditions at the Centennial Site and an explanation regarding the baseline approach used by the DEIR. However, the commenter's concerns regarding the existing environmental contamination on the Centennial Site are misplaced because the project cannot utilize the Centennial Site for placement of engineered fill unless and until such cleanup work, under the authority of the DTSC, has been completed. The Project Description does not allow for placement of fill on the Centennial Site until such cleanup is completed, and the ongoing DTSC cleanup project precludes use of this site until the voluntary cleanup is complete. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-56

The commenter asserts that the DEIR fails to analyze or mitigate hazardous impacts relating to waste rock and mine tailings and cites the comment from the Baseline comment Grp 21-109. Please see Response to Comment Grp 21-109, Master Response 8 - Mine Waste Characterization, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Grp 21-57

Please see Response to Comment Grp 7-95.

Response to Comment Grp 21-58

The commenter asserts that the DEIR failed to analyze the cumulative hazard impacts of the separate DTSC project along with the project and specifically asserts that the DEIR should have analyzed the impacts of the Centennial DTSC Cleanup Project hauling hazardous materials along Brunswick Road in conjunction with the project. While the DTSC Cleanup project is separate from the project, the DTSC Cleanup project does not propose to haul hazardous material along Brunswick Road and proposes to cap any contaminated material in-place on the Centennial Site. Accordingly, the commenter's premise that the DTSC Cleanup project would have cumulative hazard impacts along with the project due to the DTSC Cleanup project hauling hazardous material is unfounded. The separate DTSC Cleanup project would be required to comply with applicable local, state and federal laws and regulations regarding release of hazardous materials, as such no cumulative impact is expected.

As discussed in the DEIR, "*In general, hazardous materials and other public health and safety issues are site specific and/or project-specific, and would not be significantly affected by other development within the project area. While the proposed project would involve haul of hazardous materials to and from the Brunswick Industrial Site via Brunswick Road, no other cumulative projects are anticipated to similarly haul hazardous materials along Brunswick Road on an ongoing basis. In addition, cumulative development projects would be subject to the same federal, State, and local hazardous materials management requirements as would the proposed project, which would minimize potential risks associated with increased hazardous materials use in the community*." As concluded in the DEIR, the project along with other projects that are subject to local, state and federal requirements would not cause a cumulative hazard impact due to the application of those laws and regulations. The DTSC Cleanup project is clearly subject to ongoing state oversight, and therefore would not contribute to a cumulative hazard impact in connection with the project. Also, please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-59

The commenter generally states that the DEIR is inadequate because it fails to analyze the DTSC Cleanup project's impact on air quality, the project's impact on air quality that will occur if the DTSC Cleanup project does not occur, includes a contradictory project construction timeline, improperly relies on assumed mitigation measures, fails to mitigate significant air quality impacts from operational emissions of criteria pollutants, and that the health risk assessment fails to disclose essential information and lacks substantial evidence of its conclusions. The commenter's arguments are addressed in responses to the commenter's more specific comments that ensue in the letter. Please see Responses to Comments Grp 21-60 through Grp 21-67 below.

Response to Comment Grp 21-60

The commenter asserts that the project's DEIR must analyze air quality impacts from the DTSC Cleanup project, asserting that the DTSC Cleanup project is an essential part of the project. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-61

The commenter argues that the DEIR did not adequately address the project's air quality impacts that would occur in the situation where the Centennial Site clean-up is not completed within the life of the project and sale of waste rock and sand tailings were to occur sooner than anticipated. The DEIR analyzed the impacts of off-site hauling of rock material to the construction aggregate

market, starting in 2033; however, it was assumed that prior to 2033, rock material would be placed on the Brunswick engineered fill pile and Centennial Site engineered fill pile.

Based on public comments regarding the air quality and GHG impacts associated with hauling of rock material to construction aggregate purchasers earlier than anticipated, the applicant has agreed to a condition of approval that would require the applicant to use electric trucks for any offsite sale or transport of waste rock or sand tailings from the Brunswick site (other than to the Centennial Site) if such transport occurs prior to 2033. Hauling of material to offsite locations for use as construction aggregate starting in 2033 was already assumed in the DEIR's analysis; thus, the emissions impacts associated with this activity are already included in the DEIR, regardless of whether the Centennial Site is available for placement of fill material. The below condition would ensure that the project would not have greater air quality and GHG emissions impacts than analyzed under the DEIR even if the Centennial Site is not available for placement of engineered fill. The text of the condition of approval is provided below:

> COA 4: In the event that sand tailings or waste rock material is transported from the Brunswick Site prior to 2033 to locations other than the Centennial Site, all transport of such material shall be accomplished using electric vehicles.

Response to Comment Grp 21-62

The commenter asserts that the DEIR is inadequate because the Project Description states that project construction is expected to take 18 months; however, the air quality analysis assumes that the project construction would take only 12 months. Please see Master Response 24 - Project Construction Schedule.

Response to Comment Grp 21-63

The commenter asserts that the DEIR is deficient because the applicant proposed measures (APMs) included in the air quality analysis are not incorporated as mitigation measures or as part of the Project Description and therefore there is no assurance that these APMs will be implemented. As the applicant proposed these measures as part of the project, prior to analysis of air quality impacts of the project, they are properly considered part of the Project Description. Regarding project design, CEQA Guidelines 15070(b)(1) and 15126.4(a)(1)(A) specifically permit the incorporation of project design features into a project. Nonetheless, to clarify that the APMs are enforceable conditions, a condition of approval shall be imposed on the project, and incorporated into the MMRP to require that applicant proposed measures APM-AQ-1, APM-AQ-2, and APM-AQ3 will be implemented by the mine operator, as already discussed in Response to Comment Grp 21-7.

The commenter cites *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, for the proposition that the APMs should be considered mitigation measures rather than incorporated into the project, to allow for evaluation of the effectiveness of mitigation. However, unlike the situation in Lotus, the DEIR contains APMs, which were proposed by the applicant as part of the project, but also contains Mitigation Measure 4.3-1(a) and Mitigation Measure 4.3-1(b), which are evaluated separately from the project's pre-mitigation impacts. The project is clearly distinguishable from the situation in *Lotus*, which involved mitigation of Caltrans' impacts to old growth redwood roots based on incorporation of nine avoidance, minimization, and/or mitigation measures including methods of excavation in root zones, watering regimes, plant care, fill management, and replanting methods. Unlike the *Lotus* case where the mitigation was

incorporated as part of the project leading to a less-than-significant conclusion without analysis of those measures and based on a subjective judgment that was not clearly disclosed to the public, the project's criteria air pollutant emissions incorporating the APMs as part of the proposed project can be directly measured against numerical emissions thresholds established by the Northern Sierra Air Quality Management District. In other words, while the EIR in *Lotus* involved a subjective threshold related to root damage where the analysis was hidden from the public, the APMs in the DEIR relate to an objective threshold for which the public and decision makers can clearly assess whether the project (including the APMs) is below or exceeds. Finally, the incorporation of separate mitigation for this same air quality impact (Mitigation Measure 4.3-1(a) and Mitigation Measure 4.3-1(b)), also distinguishes the DEIR's APMs from the situation in *Lotus.*

Response to Comment Grp 21-64

Please see Response to Comment Grp 21-63.

Response to Comment Grp 21-65

The commenter asserts that the DEIR is deficient due to the lack of explanation on the reduction of criteria air pollutant emission impacts to a less than significant level. Please see Master Response 19 – NSAQMD Criteria Pollutant Thresholds during Operations.

Response to Comment Grp 21-66

The commenter asserts that the health risk assessment in the DEIR fails to disclose essential information and lacks substantial evidence to support its conclusions. Extensive documentation of project emissions in different phases of the project are provided in Appendix E.1 of the DEIR. Mitigation Measure 4.3-1(b) requires that prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan which includes the use of Tier 4 Final engines for off-road equipment with engines equal to or greater than 50 horsepower. As discussed on pages 4.3-79 and 4.3-80 of the DEIR, this mitigation measure would result in a significant decrease of calculated cancer risk at the Maximally Exposed Individual Resident from 10.4 to 7.6 per million. Detailed emission data is provided in Appendix E.1 of the DEIR. As shown on pages 114 of Appendix E.1, the annual emissions of PM_{10} (used to calculate health risk from diesel exhaust) from offroad equipment in the unmitigated scenario is 0.27 tons/year, and as shown on page 118 of Appendix E.1, the annual emissions of PM_{10} from offroad equipment in the mitigated scenario is 0.08 tons/year. This substantial reduction in diesel exhaust emissions during construction results in a substantial reduction to health risk at the MEIR. A memo showing health risk isopleths, sensitive receptor locations, and health risk at the MEIR by pollutant and project phase has been prepared to clarify the results of the health risk assessment. Please see Dudek Health Risk Memorandum attached to the Final EIR as Appendix K. The cancer health risk exposure at the MEIR (see pages 1632-1634 of memo) is summarized in the table below. Pollutants with negligible associated health risk are excluded from the table. Construction emissions of asbestos and diesel exhaust comprise the majority of calculated health risk and the use of Tier 4 engines for construction in the mitigated scenario significantly decreases calculated health risk as shown in the below table.

Calculated Caner Risk at the MEIR

Activity	Cancer Risk per million Mitigated	Unmitigated
Construction - Asbestos in Dust	3.7	3.7
Construction - Diesel Exhaust	1.2	4.1
Operations - Asbestos in Dust	1.8	1.8
Operations - Diesel Exhaust	0.6	0.6
Operations - Arsenic in Dust	0.3	0.3
Total	7.6	10.4

Response to Comment Grp 21-67

Extensive documentation of project emissions in different phases of the project are provided in Appendix E.1 of the DEIR. A memo showing health risk isopleths and sensitive receptor locations has been prepared to clarify the results of the health risk assessment. Please see Dudek Health Risk Memorandum attached to the Final EIR as Appendix K. The commenters request visual representations of the results of the Health Risk Assessment (HRA) for the project. The HRA for the project describes the impact to the maximally exposed individual resident (MEIR), which is the residential receptor north of the Brunswick site. The isopleths shown on Exhibits A through D of the Dudek Memo at the Brunswick site are based on the HRA provided in the DEIR for residential receptors. There are no residential receptors in proximity of the Centennial site. In order to plot the isopleth of health risk in this area, a Worker Health Risk Assessment was prepared for the Final EIR. The locations of residential and worker receptors are annotated on Exhibits A through D of the memo. In the case of the calculated worker health risk, no isopleths are shown at the Centennial site because there is no location onsite or offsite where health risk exceeds a level of significance. The health risk to the maximally exposed individual worker (MEIW) is calculated in the memo. As described in the memo, all project emissions, including trucks, off-road equipment, underground/blasting/crushing, ore processing, fuel tank storage, backup diesel generators, and material handling were incorporated into the Worker Health Risk Assessment. The commenter requests detailed information on the activities and pollutants that comprise the calculated health risk at the MEIR. This information is provided on pages 1632 through 1637 of the Dudek Memo. The cancer health risk exposure at the MEIR (see pages 1632-1634 of memo) is summarized in the table below. Pollutants with negligible associated health risk are excluded from the table. Construction emissions of asbestos and diesel exhaust comprise the majority of calculated health risk and the use of Tier 4 engines for construction in the mitigated scenario significantly decreases calculated health risk. Asbestos emissions during construction are based on very conservative estimates (see Response to NSAQMD Comment Agcy 11-17). Asbestos during operations is also conservatively estimated, see Master Response 22 - Conservatism of Asbestos Assumptions. An Asbestos Dust Mitigation Plan is required for both construction and operations in order to minimize exposure of the public to naturally occurring asbestos.

Calculated Caner Risk at the MEIR

Activity	Cancer Risk per million Mitigated	Unmitigated
Construction - Asbestos in Dust	3.7	3.7
Construction - Diesel Exhaust	1.2	4.1
Operations - Asbestos in Dust	1.8	1.8
Operations - Diesel Exhaust	0.6	0.6
Operations - Arsenic in Dust	0.3	0.3
Total	7.6	10.4

Response to Comment Grp 21-68

The commenter asserts that the DEIR fails to adequately analyze or mitigate the project's GHG emissions. This is an introductory comment that summarizes several of the commenter's arguments. The commenter's specific arguments are addressed in Responses to Comments Grp 21-69 through Grp 21-92 below.

Response to Comment Grp 21-69

The commenter asserts that the DEIR fails to adequately analyze the Centennial Cleanup project's GHG emissions impacts. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-70

Please see Response to Comment Grp 21-14.

Response to Comment Grp 21-71

Please see Master Response 24 - Project Construction Schedule.

Response to Comment Grp 21-72

The commenter asserts that the project's commitment to use electrical (non-diesel) equipment for underground mining operations must be an enforceable condition of approval to be used in the GHG emission analysis and energy analysis. While the use of electrical equipment underground is an enforceable part of the Project Description, to clarify the analysis, the County has required the following condition of approval, as also shown in Chapter 4, Mitigation Monitoring and Reporting Program, of this Final EIR:

> COA 8: The applicant shall be required to use only electrical, pneumatic, or battery powered mining equipment in the underground mine.

Response to Comment Grp 21-73

Please see Response to Comment Grp 21-63.

Response to Comment Grp 21-74

Please see Master Response 27 - Greenhouse Gas Thresholds. The commenter states that the DEIR fails to adequately analyze certain GHG emissions generated during project operations, specifically, off-road vehicles and equipment, emergency generator use, underground blasting, and solid waste, etc. No evidence is provided to justify this claim. These GHG emissions sources

were clearly accounted for in the project-specific GHG modeling, as stated on page 80 of Appendix E.1 to the DEIR.

Response to Comment Grp 21-75
Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 21-76
Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 21-77
The commenter asserts that the DEIR fails to calculate the total amount of GHG emissions over the life of the project. However, the total amount of GHG emissions over the life of the project is not relevant to the applicable significance threshold. In addition, the annual anticipated GHG emissions for each year range is provided, such that a reader could calculate the sum easily, if desired. The commenter calculated this amount in its comment; thus, the DEIR did not fail in disclosing this information to the Public. The commenter fails to provide evidence as to why the failure to provide a sum of numbers already provided is a serious deficiency. Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 21-78
The commenter asserts that the DEIR must analyze operational emissions against a net-zero GHG threshold. Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 21-79
The commenter asserts that the DEIR's GHG mitigation offsets lack adequate performance standards and are improperly deferred. Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-80
The commenter asserts that the DEIR's GHG mitigation offsets are not additional, real, permanent, verifiable and enforceable. Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-81
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-82
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-83
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-84
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-85
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-86
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-87
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-88
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-89
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-90
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-91
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-92
Please see Master Response 28 - Greenhouse Gas Credits.

Response to Comment Grp 21-93
This comment is introductory and generally alleges that the DEIR fails to adequately analyze and mitigate the project's impacts on energy use. The commenter's specific arguments are addressed in Responses to Comments Grp 21-94 through Grp 21-97 set forth below.

Response to Comment Grp 21-94
The commenter asserts that the DEIR fails to analyze the energy use of the Centennial Cleanup project. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 21-95
The commenter asserts that the DEIR failed to evaluate the additional energy use that would result from the project if the Centennial Cleanup project does not occur, because rock would need to be transported to the aggregate market rather than to the Centennial site. The DEIR analyzed the impacts of off-site hauling of rock material to the construction aggregate market, starting in 2033; however, it was assumed in the DEIR that prior to 2033, rock material would be placed on the Brunswick engineered fill pile and Centennial Site engineered fill pile. Based on public comments regarding the air quality and GHG impacts associated with hauling of rock material to construction aggregate purchasers earlier than anticipated, the applicant has agreed to a condition of approval that would require the applicant to use electric trucks for any offsite sale or transport of waste rock or sand tailings from the Brunswick site (other than to the Centennial Site) if such transport occurs prior to 2033. Hauling of material to offsite locations for use as construction aggregate starting in 2033 was already assumed in the DEIR's analysis; thus, the energy use impacts associated with this activity are already included in the DEIR, regardless of whether the Centennial Site is available for placement of fill material.

Response to Comment Grp 21-96
Please see Master Response 24 - Project Construction Schedule. The 12-month project construction schedule assumed in the air quality analysis for purposes of conservatively estimating air pollutant emissions includes the same activities and energy use as an 18-month project construction schedule. The difference in the schedules is only that the 12-month schedule

assumes that many of the construction activities happened concurrently rather than sequentially. As such, the sum energy consumption under either scenario would be the same.

Response to Comment Grp 21-97

Please see Response to Comment Grp 21-63.

Response to Comment Grp 21-98

The commenter asserts that the DEIR's Alternative Analysis is inadequate, but does not identify any specific deficiencies in the analysis.

Response to Comment Grp 21-99

The commenter asserts that the DEIR failed to include a reasonable range of alternatives for the project because the DEIR mistakenly concluded that multiple impacts were less than significant when, according to the commenter, these impacts should have been determined to be significant and unavoidable. The commenter does not explain why the DEIR is incorrect about the other impacts listed in the comment. See responses to the commenter's other comments above and below regarding the DEIR's impact conclusions. The commenter also asserts that the DEIR should be revised and recirculated. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met. Please also see Response to Comment Grp 21-100.

Response to Comment Grp 21-100

As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Response to Comment Grp 21-101

The commenter asserts that the project objectives are defined so narrowly that they essentially call for the project itself, and do not allow for meaningful comparison for the project and the alternatives. However, the commenter is incorrect that the project objectives were purposefully drafted to allow for automatic elimination of all alternatives and selection of the proposed project. Underground gold mining is an extremely capital-intensive business, which is the reason that daily ore production levels were set in project objective no. 1 at a level at which the project could realistically obtain financing to construct the full project buildout (1,000 tons per day). The commenter scoffs at this objective by arguing this is saying "the objective of the project is to implement the project;" however, financing and construction of a mine that will take in excess of 100 million dollars to construct would not be feasible with lower throughput levels than requested by the applicant in project objective no. 1. Notably, the historic mining operation averaged approximately 1,000 tons per day of production in the years before the forced closure in 1942 and the proposed throughput for the project proposed re-opening of the mine at a similar throughput is therefore a reasonable objective.

Regarding the commenter's sharp dismissal of project objective no. 2 (locate the project on property that Rise Grass Valley, Inc. owns that provides an existing access to the underground workings), the commenter appears to be unfamiliar with the fundamentals of geology and with CEQA Guidelines Section 15126.6. (Consideration and Discussion of Alternatives to the Proposed Project.) Economical quantities of gold only exist in very limited locations throughout the world; therefore, placement of Rise's gold mining project on land that it owns (which is known to contain gold - unlike most other properties) is clearly a more important project objective than would be the case for other projects where numerous locations might be suitable. Gold is a very rare mineral that does not occur on most properties; thus, Rise Gold cannot readily consider moving its project to alternative locations. As stated in CEQA Guidelines Section 15126.6(f)(2)(B), "in some cases there may be no feasible alternative locations for a geothermal plant or mining project which must be in close proximity to natural resources at a given location."

Accordingly, contrary to the commenter's assertion, the project objectives reflect the specialized nature of the project, not a narrowly defined set of objectives designed to eliminate consideration of any alternative.

Response to Comment Grp 21-102

The commenter asserts that the project alternatives are flawed because, like the project, they assume that the Centennial Cleanup Project will be completed. The commenter does not explain why the DEIR must assume the DTSC project is not completed for the purpose of analyzing alternatives to the project, and provides no legal authority for this position. Please also see Master Response 4 – Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 21-103

Please see Responses to Comments Grp 21-100 and Grp 21-101.

Response to Comment Grp 21-104

Please see Responses to Comments Grp 21-100 and 21-101. The commenter generally suggests a mixed-use employment center as an alternative but does not provide enough detail for the County to analyze this proposal (e.g., it is unclear which site the commenter is referring to). In footnote 14 the commenter asserts that the County's General Plan designates the Centennial site as "Industrial" whereas the City of Grass Valley designates the site as "Urban Medium Density" and asserts that the project would violate the County's General Plan policy 1.8.3. The commenter characterizes General Plan Policy as "calling for its land use designations to be consistent with the City's designations;" however, the commenter overstates the County policy of "consistency." Rather than require strict consistency, General Plan Policy 1.8.3 states that "the Nevada County General Plan Land Use Maps will generally reflect the City's/Town's General Plan land use mapping." (General Plan Land Use Element, p. 1-43 (emphasis added).) The project is not proposing to change the general plan designation of the Centennial site, and the Centennial site will retain its existing Industrial County General Plan designation that existed prior to the project being proposed. As the project is not proposing any change to the existing General Plan designation (or zoning) that currently exists, the commenter's argument that the project is causing a land use conflict between City and County zoning is baseless.

The last sentence of General Plan Policy 1.8.3, states "the County's Plan will not preclude implementation of the City's/Town's Plan by providing for a significantly more intensive land use than the City's/Town's Plan." The commenter implies that the project violates this policy with

respect to the Centennial Site because the Industrial land use designation in the County's General Plan allows more intense land uses than the City's Urban Medium Density designation. Again, the project is not inconsistent with this portion of Policy 1.8.3 as the project does not propose to change the General Plan designation of the Centennial Site. The General Plan designation of the Centennial Site was established by the County prior to and separately from the proposed project. Accordingly, even if the Industrial land use designation was inconsistent with the City's Urban Medium Density land use designation and allowed much more intense use, the project is not the cause of any alleged inconsistency. Moreover, the project is not proposing any specific Industrial land use and is therefore not creating a "more intensive land use" than allowed by the City's land use designation. Rather, the project merely proposes placement of engineered fill on the Centennial Site, which would create a level area adequate for future industrial use. Nonetheless, no industrial use is proposed, and the placement of engineered fill would also make the site more conducive to development of uses anticipated under the City's Urban Medium Density designation. The project does not include any entitlements that would require the Centennial Site to be developed for industrial use in the future. In summary, the project is not changing the land use designation of the Centennial Site and is not approving any specific land use that would conflict with the City's land use designation; therefore, the project is not in violation of General Plan Policy 1.8.3.

Response to Comment Grp 21-105

The commenter asserts that the County may not approve the proposed project because Alternative 2 (Elimination of Centennial Industrial Site) would meet nearly all of the project objectives and is the environmentally superior alternative. In support for its argument the commenter cites Public Resources Code Section 21002 for the proposition that "an agency may not approve a proposed project if a feasible alternative exists that would meet a project's objectives and would diminish or avoid its significant environmental impacts." (Comment Grp 21-105, emphasis added) However, Public Resources Code Section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Emphasis added.) The commenter mistakenly uses the term "diminish" when the actual CEQA statute uses the term "substantially lessen," which has a different meaning, due to the qualifying term "substantially."

While the DEIR acknowledges that Alternative 2 may lessen some traffic impacts, it would still result in significant and unavoidable traffic impacts and all other significant impacts of the project would remain unchanged under Alternative 2. (DEIR pp. 6-21 to 6-29.) As such, while Alternative 2 would somewhat lessen traffic impacts, it is not an alternative that "would substantially lessen the significant environmental effects of such projects" and therefore Alternative 2 does not preclude approval of the proposed project. (Public Resources Code Section 21002 (emphasis added).)

The commenter cites *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d at 443-45 in support of its argument; however, this case uses the "substantially lessen" standard from the CEQA statute rather than the different "diminish" standard used by commenter. (Id. At 438.) Further, *Citizens for Quality Growth* is distinguishable from the project, because in that case the City of Mount Shasta failed to make any findings regarding the infeasibility of the alternatives. In this case, the County has not yet made any findings regarding the project and will do so at the time of project approval or denial.

The other case cited by the commenter, *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720, includes the same correct "substantially lessen" standard used in the CEQA statutes rather than the commenter's asserted "diminish" standard and also includes commentary on the *Citizens for Quality Growth* case (also cited by commenter), which shows that commenter's interpretation of that case was misguided. As stated by the court in *Kings County Farm Bureau,* "[c]ontrary to appellant's contention, *Citizens For Quality Growth* v. *City of Mt. Shasta, supra,* 198 Cal.App.3d 433, did not hold CEQA compelled adoption of one of the alternative projects if it would avoid the identified environmental damage … [i]t merely required the agency to weigh the feasibility of the proposed alternatives and to make findings regarding feasibility." The County will make any appropriate findings at the time of project approval or denial.

The commenter also cites CEQA Guidelines Section 15126.6(b) for the proposition that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The commenter argues that under CEQA Guidelines Section 15126.6(b), Alternative 2 must be selected and approved rather than the proposed project even though Alternative 2 does not satisfy all of the project objectives. However, CEQA Guidelines Section 15126.6(b) relates to what alternatives should be discussed in an EIR, and does not include a mandate as to what alternative must be selected. In this case, the DEIR does include discussion of alternatives that do not satisfy all project objectives, and is therefore consistent with the requirements of CEQA Guidelines Section 15126.6(b).

Response to Comment Grp 21-106

The commenter summarizes its prior comments and then asserts that the DEIR should be revised and recirculated. Please see Responses to Comments Grp 21-1 through Grp 21-105. As discussed in more detail in the Introduction chapter of this Final EIR, the County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

Response to Comment Grp 21-107

This is an introductory comment. The commenter's specific comments and questions are addressed below.

Response to Comment Grp 21-108

The commenter asserts that the DTSC cleanup project and the mine project should be analyzed under one CEQA document. Please see Master Response 4- Cleanup Project is a Separate Project Under CEQA. Also see Section 1.3 of the DEIR regarding the DEIR's approach to the Centennial Industrial Site CEQA baseline.

Response to Comment Grp 21-109

The commenter asserts that the character of historic mine waste found on the Centennial site is evidence that the project will cause hazards and water quality impacts. The commenter also asserts that the DEIR's mitigation requirement of submitting a Report of Waste Discharge to the Regional Water Quality Control Board for placement of engineered fill is insufficient. Description of the waste rock and mine tailings, including the related analytical data, are presented in Chapter 4.8 of the DEIR and the analysis of air quality and health risk assessment are provided in Chapter 4.3 of the DEIR. Geochemical testwork of mine materials is presented in section 4.4 of Appendix K.2. Accordingly, the impacts associated with the chemical composition of the rock that will be

mined at the project site is included in multiple sections of the DEIR. The commenter dislikes that these discussions are not placed into the Hazards section of the DEIR; however, the individual impacts related to the chemical composition of the rock are analyzed in the most appropriate sections of the DEIR for those impacts.

The commenter asserts that based on the quality of historic mine waste at the project sites, the project would "almost certainly result in numerous new contaminated waste sites that pose a threat to the public and the environment." However, the proposed project would produce mine waste with lower sulfide and metal content than those produced historically. Further, the historic mine waste has been determined to be Group C mining waste (Please see Master Response 9) from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 – Historical Mine Waste at Centennial Site. While the commenter alleges that mitigation requiring submittal of a Report of Waste Discharge, and compliance with water quality standards is not proper mitigation, compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards. (14 CCR Section 15126.4.)

The same paragraph on page 4.8-50 of the DEIR, cited in this comment, discusses the data sets used to evaluate the potential impacts on water quality related to the placement of engineered fill. Based on that information, the DEIR concludes that there would be a potentially significant impact related to the placement of engineered fill (at page 4.8-51, Conclusion paragraph) and provides Mitigation Measure 4.8-1(e). This mitigation measure lists the evaluations that the Water Board will use to determine the appropriate mining waste classification, which would be based on existing data, as presented in the DEIR, and future data, to be provided in the Report of Waste Discharge. Determination of the mining waste classification would define the CCR Title 27 specifications for construction of the disposal units that will contain the engineered fill. The Title 27 specifications identify the measures that would be required to prevent any leaching of hazardous materials and other non-hazardous constituents at levels that would exceed applicable water quality standards. Please see Master Response 8 – Mine Waste Characterization. As noted in Master Response 8, Mitigation Measure 4.8-1(e) has been revised in response to the CVRWQCB comment letter on the DEIR for clarification purposes (see Response to Comment Agcy 5-4). The revised mitigation language clarifies that, in accordance with Title 27 of the California Code of Regulations (CCR), the applicant shall prepare and implement a Waste Characterization Plan which shall be incorporated into the approved WDR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes shall be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the project for construction aggregate or fill purposes offsite (i.e., sites other than the applicant's Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization shall be established in the approved WDR.

Response to Comment Grp 21-110

The analysis provided in Chapter 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. Pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. No significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, Beaver or other areas. The predictions include the use of a 100% safety factor, multiple sensitively scenarios, which have been peer reviewed by the County's independent expert consultant. However, the DEIR acknowledges that without the implementation of a groundwater monitoring plan and well mitigation plan, the project could result in a significant impact to groundwater supplies.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.

The commenter states it would not be possible for pre-dewatering baseline levels to be determined when they would be based on an assessment that would not start until after dewatering begins. However, the commenter is not correct in its understanding of the required mitigation. Mitigation Measure 4.8-2(a)(1) requires water-level monitoring data for a minimum of 12 months before commencement of dewatering of the mine. This data will be used to establish the baseline for each well before commencement of mine dewatering. As such, the commenter is incorrect that groundwater monitoring and baseline data collection is deferred until after dewatering.

As stated in Section 3.0 of the GMP, the drawdown caused by project dewatering will propagate outward over time. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Obviously, the dewatering of the mine workings cannot take place until the appropriate permits are in place and the CEQA process is complete.

The commenter asserts that the collection of groundwater data from monitoring wells as part of Mitigation Measure 4.8-2(a) is not appropriate because it defers the mitigation to the future. However, deferred mitigation may be appropriate where a local agency commits itself to mitigation and specific performance criteria are articulated. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670-671; see also *North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 647 [upholding deferred mitigation measure for potential pile-driving impacts on special-status fish species]; *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1448–1450 [a deferred approach may be appropriate where it is not reasonably practical or feasible to provide a more complete analysis before approval and the EIR otherwise provides adequate information of the project's impacts].) Deferred mitigation measures are also explicitly permissible under the CEQA Guidelines. (See 14 CCR Sec. 15126.4(a)(1)(B).)

In this case, the deferral of setting up a monitoring well network until after project approval is appropriate, because Mitigation Measure 4.8-2(a) and Mitigation Measure 4.8-2(b) include specific performance criteria that ensure impacts will be mitigated. Further, the commenter's criticism is misplaced, because the collection of data from monitoring wells, even if done as part of the DEIR process, would not change the impact analysis. The groundwater impact analysis was based on a computer model of regional groundwater flow, which is already calibrated against levels of individual groundwater wells under existing (pre-dewatering) conditions. Additional measurements would not substantially inform or change that analysis.

In addition, as discussed in Master Response 15 – Adequacy of Groundwater Monitoring Wells, to provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the project requiring that monitoring of domestic water wells will be conducted upon request for property owners within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. Some of these properties do not have a domestic water well but to ensure that well owners are not excluded all owners will be contacted by the Company.

Response to Comment Grp 21-111

The commenter states that the DEIR does not appropriately acknowledge the uncertainty associated with groundwater supply in fractured bedrock and implies that the groundwater model used in the DEIR is not appropriate for the project site. Please see Master Response 14 - Adequacy of Groundwater Model. Page 25 of DEIR Appendix K.3 acknowledges that there are uncertainties in groundwater modelling and states that the predicted contours are based upon the numerical groundwater flow model and the assumptions inherent in the model. Actual, in-field measured water levels may be different from the predicted water levels due to heterogeneities in the hydrogeologic system.

Response to Comment Grp 21-112

The commenter asserts that the water level measurements used to calibrate the groundwater model are insufficient. However, the groundwater model is calibrated to measured water levels in domestic wells and not just the water level in the Union Hill Mine.

Itasca simulated pre-historical mining conditions (before any mining had taken place). Itasca calibrated the model against current water levels measured in wells outside of the mine area. (DEIR Appendix K.3, Section 4.5). Using the simulated groundwater from the pre-historical mining condition, Itasca calibrated the model using the known inflow rates and underground mine workings from two periods of mining - the Idaho mine in 1918 and the entire connected Idaho-Maryland-Brunswick mine in 1956. The model was also calibrated against the known level of water in the Union Hill Mine in 1956. (Appendix K.3, Section 4.6 pages 21-22). The drain nodes for the mine workings were turned off and mine voids were simulated with a zone of high K and the drains along Wolf Creek (which currently drain the mine) were added at their known elevation. Please see Itasca Clarification of Modeling Components Memo attached to the Final EIR as Appendix O. The model was then compared against current water levels measured in wells in the mine area. The model was found to be correctly calibrated to the current measured water levels. (DEIR Appendix K.3, Section 4.5 page 22).

Response to Comment 21-113

The commenter argues that the groundwater model is inadequate because it predicts water levels to recover after dewatering ceases to a specific range of water level rather than a specific exact water level. As stated on page 25 of Appendix K.3, the model is not designed to simulate seasonal or annual changes resulting from variations in groundwater recharge associated with variations in precipitation and groundwater recharge that would occur over the model simulation period. Therefore, a simulated value is expected to be within the range of seasonal water level variation measured in domestic wells.

In addition to the eight wells shown in Figure 4-8 of the report, as discussed on page 22 of Appendix K.3, the comparison between simulated and measured groundwater levels is shown in Figure 4-9, which shows that the simulated hydraulic heads in 2019 reasonably agree with the measured groundwater levels in numerous other wells in the area. As shown in Figure 4-9, wells with higher quality hydrograph data show higher correlation with simulated water level. Furthermore, as discussed on page 22 of Appendix K.3, the hydraulic conductivity (k) values derived from the groundwater flow model calibration are within the range of EMKO's estimated K values (See Section 3.3.5 of Appendix K.2) and literature values.

Figures 4-8 and 4-9, of Appendix K.3 show that the model reliably predicts historical water levels in domestic wells. Water-level measurements in domestic wells can be influenced by many factors, such as seasonal variations, pumping variations, measurement errors, and so forth. The Groundwater Monitoring Plan (Appendix K.8 of the DEIR) recommends the installation of 30 groundwater monitoring wells at 15 locations to assess variations in groundwater levels. The water-level data from specially designed monitoring wells is more reliable because the data will not be subject to uncertainties associated with individual domestic wells. Water levels will be collected at least 12 months prior to the implementation of dewatering of the existing mine workings. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones, for example, the fractured bedrock at the project site, propagate with time as a result of pumping. The water-level data will be used to update the model.

Response to Comment Grp 21-114

The commenter asserts that the groundwater model used for the DEIR did not properly simulate drainage of groundwater from existing mine workings. However, in the calibration of the model during recovery (1956 to 2019), mine voids were simulated with a zone of high K (5,000 ft/day) and high specific yield (effective porosity of 50%) for the area with drifts and raises. The drain nodes for the mine workings were turned off. The drains along Wolf Creek were simulated as drains with surveyed elevations from 2,497 ft to 2,502 ft amsl. Please see Itasca Clarification of Modeling Components Memo attached to the Final EIR as Appendix O.

Response to Comment Grp 21-115

The commenter summarizes its comments from Comments Grp 21-110 through 21-114. Please see Responses to Comments Grp 21-110 through Grp 21-114.

Response to Comment Grp 21-116

This comment is a reproduction of Figure 4.8-7 of the DEIR. Comment noted.

Response to Comment Grp 21-117

The commenter asserts that the selection of a 10% reduction threshold for significant groundwater well supply impacts is not justified. The selection of the 10% reduction as a threshold of significance is discussed in Section 3.2.1, page 80, of Appendix K.2 of the DEIR.

Drawdowns within wells completed in unconfined aquifer conditions are sensitive to the amount of drawdown that occurs as a percent of the total water column. This sensitivity is due to the reduction in the effective transmissivity that occurs as the height of the water column decreases in unconfined aquifers. Simulations using the Theis equation (Domenico and Schwartz, 1990) indicate that reductions in the water column of 20 percent to 40 percent could cause the production rate of the well to become unstable by incrementally decreasing the water column much more than would occur under existing conditions. For this analysis, a 100 percent factor of safety is applied to the potential reduction resulting in unstable conditions, such that a criterion of 10 percent of the water column is used to define wells that might be substantially affected by dewatering of the underground mine workings.

The characteristics of domestic wells in the area is discussed in Sections 3.3 and 4.2 of Appendix K.2 of the DEIR. The position of the well pumps is not known but are not likely positioned with the pump intake barely above the water level. Normal seasonal fluctuation occurs in the groundwater level of 10 ft to 30 ft or more. A water well pump would likely be placed closer to the bottom of the well casing to be below the drawdown created from its own pumping and take advantage of storage volume of the well.

The commenter also states that the DEIR does not describe how drawdown would be determined relative to baseline conditions. Mitigation Measure 4.8-2(a)(1) requires water-level monitoring data for a minimum of 12 months before commencement of dewatering of the mine. This data will be used to establish the baseline for each well before commencement of mine dewatering and would capture seasonal variation in each monitoring well. Further, Mitigation Measure 4.8-2(a)(3) requires the preparation of potentiometric-surface contour maps showing the groundwater elevations across the site. Mitigation Measure 4.8-2(a)(4) requires that for each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. A potentiometric map is a map of the water table elevation contours which is constructed from the measurements at monitoring wells. The water level in domestic water wells in the mine area can be estimated from this map and the water column for each well can be calculated based on the estimated water level and depth of each well.

As discussed on page 16 of the GMP (Appendix K.8 of the DEIR), actual monitoring well installation locations will be surveyed, and a map of the installed well locations superimposed upon a map or aerial photograph. The locations of domestic wells, project boundaries, and other relevant features will be included on this map. The map will serve as the basis for constructing potentiometric surface maps for baseline water levels. Potentiometric-surface contour maps show the groundwater elevations across the site.

In addition, as discussed in Master Response 15 – Adequacy of Groundwater Monitoring Wells, to provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the project requiring that monitoring of domestic water wells will be conducted upon request for property owners within or nearby the predicted 1-ft

drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. Some of these properties do not have a domestic water well but to ensure that well owners are not excluded all owners will be contacted by the Company.

Response to Comment Grp 21-118

The commenter asserts that selection of the 10% reduction of water column as a threshold is unsubstantiated. Please see Response to Comment Grp 21-117.

The commenter asserts that under General Plan Policy 17.12, the correct threshold for determining when a mining project may threaten quantity or quality of water supply, is "expert opinion". The analysis provided in Chapter 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. No significant impacts to domestic water wells are predicted in other areas. The predictions include the use of a 100% safety factor, multiple sensitivity scenarios, and the analyses have been peer reviewed by the County's independent expert consultant. However, the DEIR acknowledges that without the implementation of a groundwater monitoring plan and well mitigation plan, the project could result in a significant impact to groundwater supplies.

Response to Comment Grp 21-119

The commenter asserts that to properly comply with General Plan Policy 17.12, the applicant needs to complete a detailed water supply inventory for all wells within the mineral rights boundary including a buffer zone, investigate details for each well, and develop a plan for each well to ensure that immediate water supply can be provided. The proposed analysis suggested by the commenter is not warranted, because there is no evidence that drawdown could impact the entire mineral rights area, given that there is only gold mineralization in certain limited areas. Further, sensitivity studies used in the groundwater model to simulate expanded mining areas did not significantly change the drawdown impacts. Moreover, the groundwater model and water supply analysis included in the DEIR, along with the mitigation provided in Mitigation Measures 4.8-2(a) and 4.8-2(b), provide substantial evidence of the DEIR's conclusions and also provides compliance with General Plan Policy 17.12.

As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones, for example, the fractured bedrock at the project site, propagate with time as a result of pumping. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As discussed in the Groundwater Monitoring Plan, 30 groundwater monitoring wells will be installed at 15 locations, not 15 monitoring wells. The locations of the monitoring wells are strategically placed between the mining zone and domestic wells to monitor the potential drawdown extent as the result of mining and assess the potential impacts on domestic wells. As discussed in Section 6.0 of Appendix K.3, after each monitoring well has been installed and developed, the wells will undergo a hydraulic test to obtain hydraulic-conductivity information. As discussed on pages 2-3 of the Groundwater Monitoring Plan (Appendix K.8 of the DEIR) assessment of impacts of water-level changes in domestic wells is difficult to perform when

examining each domestic well on an individual basis because of operational and depth considerations for each well.

The characteristics of domestic wells in the area are discussed in Sections 3.3 and 4.2 of Appendix K.2 of the DEIR. The example in the comment of "a monitoring well could be placed in proximity to an existing supply well and respond very differently to changing water levels in the mine during dewatering if a water-bearing bedrock fracture intersects on of the wells, but not the other" is speculative. This behavior of drawdown can only occur if there were continuous fracture networks that connect the mine with one of the wells. However, as discussed in Appendix K.2, mine workings are not connected to the wells by through-going fractures, but are instead interconnected by a complex pattern of many fractures present throughout the bedrock (page 81 Appendix K.2). Both EMKO's analysis and Itasca's model show that there is currently drawdown from the partially dewatered mine workings and that there will be drawdown from future dewatering. The evidence shows that the fractures are ubiquitous but are not large and continuous. Thus, the monitoring wells will encounter the same fracture networks as the domestic wells and the evidence against continuous fractures is strong. Domestic wells in each different area tend to behave in a similar way (as described in Sections 3.3. and 4.2 of Appendix K.2 to the DEIR).

As discussed in Section 3.3.2 and shown on Sheet 12 of Appendix K.2 of the DEIR, over 1,200 Water Well Driller Reports (also known as Well Completion Reports) available from the California Department of Water Resources (DWR)'s online database for private domestic wells are located within approximately one to two miles of the project site. Many of these wells are geolocated by property location in the DWR database while some are only located by the US Public Land Survey System (PLSS) township, range, and section. In areas within the predicted 1-foot drawdown from the groundwater model, wells with only general PLSS locations in the DWR database were matched to properties and plotted. The well database was also augmented with well data from previous applicant Emgold, which provides additional well information within the 1-foot drawdown isopleth that is not available in the DWR database. All available details about well construction and testing in the area of the 1-foot drawdown isopleth were reviewed and tabulated from the Well Completion Report or Emgold records and are provided and discussed in Section 3.3.2 of Appendix K.2., which are available for the majority of properties. The Well Mitigation Plan has been clarified to include measures to identify any wells not in the well database and gather individual well characteristics should an impact be predicted by the Groundwater Monitoring Plan. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D. The commenter states that a complete inventory of domestic water wells within and beyond the mineral rights boundary is required for the analysis of the DEIR. However, wells outside the 1-ft drawdown were not specifically analyzed for impacts from mine dewatering because they would experience negligible drawdown and therefore would not be impacted by mine dewatering. More effort in including these wells in the well database would not change the analysis or conclusions of the DEIR and therefore is not required.

Nevertheless, as discussed in Master Response 15 – Adequacy of Groundwater Monitoring Wells, to provide property owners additional assurance regarding impacts of mine dewatering, a condition of approval will be imposed on the project requiring that monitoring of domestic water wells will be conducted upon request for property owners within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure

1 of Master Response 15. Some of these properties do not have a domestic water well but to ensure that well owners are not excluded all owners will be contacted by the Company.

Response to Comment Grp 21-120

The Groundwater Monitoring Plan already incorporates the collection of 12 months baseline data from monitoring wells. The applicant has ownership of all previous well monitoring data conducted by Emgold from numerous domestic water wells in the area over multiyear periods. Additional detail has been added to the Well Mitigation Plan, which is attached to the FEIR as Appendix D for clarity of the measures that would be undertaken under this plan.

Response to Comment Grp 21-121

The commenter asserts that the project will have significant impacts related to groundwater dependent biological resources. As discussed on page 121 of Appendix K.2 of the DEIR, discharge of treated water to South Fork Wolf Creek would prevent the lowering of the groundwater levels along the reach of South Fork Wolf Creek because the full dewatering volume would be discharged to the creek, whereas only a small fraction of the groundwater that was removed from the subsurface would come from that area. Thus, the potential increased recharge due to the enhanced base flow in South Fork Wolf Creek would more than offset any effects from dewatering in the area near the creek. Along Wolf Creek, the change in base flow would be a small percentage of the existing flow, with NID releases during the summer being a dominant factor in the dry season.

As discussed on page 3.31 of the DEIR, a buried 48-inch culvert crosses the Brunswick Industrial Site. The culvert transports off-site surface drainage from Brunswick Road and a portion of the watershed to the east and south of the Brunswick Industrial Site. South Fork Wolf Creek originates from the outlet of this 48-inch culvert. The primary source that feeds this section of the creek, upstream of the proposed discharge point, is therefore not associated with groundwater nearby the area.

As such, the project would not lower groundwater levels along the creeks, and consequently would not affect groundwater dependent biological resources. Please see Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Grp 21-122

The commenter assumes that if the Centennial site was not available for fill placement that fill would be immediately hauled to offsite locations. However, if the Centennial site were not available, fill placement would take place initially at the Brunswick site rather than being hauled to local and regional construction projects. For the purpose of the Air Quality analysis, it was assumed that construction would start in 2021 which has already passed. It is not known when construction would actually start but it could not be before 2023, given the current project schedule. Construction has been assumed for the purpose of the analysis to take 1 year. The placement of fill at the Brunswick site would be placed over a duration of an estimated 6 years, immediately following the completion of construction. Based on the placement of fill at the Brunswick site rather than Centennial, on-road vehicle miles traveled (VMT) and associated emissions would be reduced for this initial phase of operations, as compared to the analysis included in the DEIR. However, assuming that the Centennial site was still not available after this time, offsite hauling of all materials, up to 60 miles one-way, would then commence in year 2033.

A realistic scenario therefore is to use the emissions rates presented for the year 2027 for NOx (see pages 215ff of the pdf document Appendix E.1) rather than the 2021 emission rates used in the commenter's provided calculation. Since logging and chipping at the Centennial site would not be taking place in this alternate scenario, this activity would be removed from the maximum daily NOx emissions. It should also be noted that the maximum daily NOx emissions are calculated for comparison to Northern Sierra Air Quality Management District (NSAQMD) thresholds, rather the annual emissions. As such, the analysis assumes 100 trips per day in the calculation of daily emissions rather than the average 50 trips per day for trucks hauling engineered fill.

Maximum daily project emissions of NOx for the Year 2027 of 100.2 pounds per day is shown in Table 16 of Appendix E.1. After removal of logging associated emissions (41 pounds per day) and on-site haul trucks (3.5 pounds per day – see pages 230 and 231 of Appendix E.1 pdf), the daily NOx emissions without any fill trucking is 55.7 pounds per day NOx. With the shift to off-site hauling, daily NOx for truck hauling would be 69.2 pounds per day, which can be calculated using the 2027 NOx emission rates (page 218 of Appendix E.1 pdf) and VMT, trips, and idling time for off-site hauling (2,190,700 VMT per year for fill haul trucks – see page 246 of the Appendix E.1 pdf). The total NOx emissions per day in this scenario would be approximately 125 pounds per day, which would be at NSAQMD significance threshold level B.

A similar analysis can be made for greenhouse gas emissions using the emission factors, annual VMT, and idling minutes contained within Appendix E.1 of the DEIR. Assuming hauling of all fill off-site starting in 2027, this scenario would result in a total of 9,800 metric tons CO_2e per year, which would also be below the threshold of significance.

Based on the preceding considerations, this scenario, whereby the Centennial Site would not be available for fill placement, would not change the significance determination or conclusions presented in the D EIR for either criteria air pollutants or GHGs. Nevertheless, as noted in Master Response 4, a condition of approval shall be imposed on the project to require that in the event the Centennial Site is not immediately available for placement of engineered fill, that sand tailings or waste rock material transported offsite prior to 2033 would be transported using electric vehicles.

Response to Comment Grp 21-123

Please see Response to Comment Grp 21-63.

Response to Comment Grp 21-124

Please see Master Response 19 – NSAQMD Criteria Pollutant Thresholds during Operations.

Response to Comment Grp 21-125

Please see Response to Comment Grp 21-66.

Response to Comment Grp 21-126

Please see Response to Comment Grp 21-67.

Response to Comment Grp 21-127

Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Grp 21-128

The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met. Please see the Introduction chapter of this Final EIR for a more detailed discussion of recirculation criteria, pursuant to CEQA Guidelines 15088.5.

Response to Comment Grp 21-129

Nighttime noise is thoroughly addressed in the project's noise study. Appendix B of the project noise study (DEIR Appendix L), presents the results of 50 individual days of noise surveys representing 24-hour noise level measurements (including every nighttime hour), conducted at 12 locations in the project vicinity. This extensive noise survey data was utilized to adjust the County's daytime, evening, and nighttime noise level standards to reflect the baseline ambient conditions so that noise impacts could be properly evaluated relative to County standards during ***all*** hours of the day. The results of those adjustments are contained in Table 6 of the project noise study. As noted in Table 9 of the project noise study, off-site hauling would be limited to the hours of 6 am to 10 pm, effectively avoiding the most sensitive nighttime periods when the potential for sleep disturbance would be greatest. The engineered fill activities occurring at both the Brunswick and Centennial Sites are proposed to occur between the hours 7 am - 3:30 pm, also avoiding the more sensitive nighttime hours. While nighttime processing operations are proposed at the Brunswick Site, the most significant noise-generating activities would occur within sound-treated buildings. Figure 10 of the project noise study clearly illustrates the nighttime noise generation of the Brunswick operations, illustrating that exterior noise levels during nighttime hours are predicted to be approximately 40 dBA or less at the nearest residences. Additional information pertaining to the more detailed comments contained in the Salter letter is provided in the specific responses to those comments below.

Table 17 of the project noise study contained in DEIR Appendix L inadvertently included predicted average (Leq) noise levels for engineered fill operations at the Brunswick Site in the column identified as maximum (Lmax) noise levels. This table was included as Table 4.10-14 of the DEIR. In addition, Table 16-A (Table 4.10-12 of the DEIR) and 17 of the project noise study inadvertently included preliminary, not final, modelling run results. These adjustments further affect the combined daytime noise Table 21 of the Noise Report (DEIR Appendix L), which is included in the DEIR as Table 4.10-19. Thus, Tables 4.10-12, 4.10-14, and 4.10-19 are hereby corrected in the Final EIR, as shown below.

Table 4.10-12
Centennial Industrial Site: Engineered Fill Activity Noise Levels

Receptor	Minimum Distance	Predicted Noise Level		Daytime Noise Criteria		Criteria Exceeded?	
		L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	500	~~54~~56	~~61~~71	63	81	**NO**	**NO**
2	600	~~50~~52	~~60~~68	68	86	**NO**	**NO**
8	1000	~~44~~51	~~42~~65	55	75	**NO**	**NO**

Note: Engineered fill placement, grading and compaction activities would be limited to daytime hours. As a result, only the daytime criteria are utilized for the assessment of potential noise impacts for this activity.
Source: Bollard Acoustical Consultants, Inc. (2021).

Table 4.10-14
Brunswick Industrial Site: Engineered Fill Activity Noise Levels

Receptor	Minimum Distance	Predicted Noise Level		Daytime Noise Criteria		Criteria Exceeded?	
		L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
15	1400	45	~~45~~50	55	75	**NO**	**NO**
16	1600	46	~~46~~57	53	75	**NO**	**NO**
17	2000	40	~~40~~51	61	75	**NO**	**NO**
18	1600	47	~~47~~59	55	74	**NO**	**NO**
19	1300	40	~~40~~42	55	74	**NO**	**NO**
20	1000	46	~~46~~48	62	75	**NO**	**NO**
21	700	47	~~47~~50	60	75	**NO**	**NO**
22	500	52	~~52~~57	61	75	**NO**	**NO**
23	400	55	~~55~~61	63	75	**NO**	**NO**
24	350	50	~~50~~60	65	80	**NO**	**NO**
25	650	50	~~50~~63	65	75	**NO**	**NO**
26	300	51	~~51~~61	55	69	**NO**	**NO**
27	600	46	~~46~~49	55	69	**NO**	**NO**
28	500	47	~~47~~51	55	69	**NO**	**NO**
29	1200	40	~~40~~41	55	69	**NO**	**NO**
30	1800	~~32~~27	~~32~~30	55	69	**NO**	**NO**

Note: Engineered fill placement, grading and compaction activities would be limited to daytime hours. As a result, only the daytime criteria are utilized for the assessment of potential noise impacts for this activity.

Source: Bollard Acoustical Consultants, Inc. (2021).

Table 4.10-19
Predicted Combined Noise Levels from All Daytime Sources at Nearest Receptors

Receptor	Project Daytime Noise Generation		Daytime Noise Criteria		Criteria Exceeded?	
	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	56	~~68~~71	63	81	**NO**	**NO**
2	54	~~67~~68	68	86	**NO**	**NO**
3	39	46	66	87	**NO**	**NO**
4	37	43	60	75	**NO**	**NO**
5	29	34	54	71	**NO**	**NO**
6	29	34	55	72	**NO**	**NO**
7	29	33	54	71	**NO**	**NO**
8	~~38~~52	~~48~~65	55	75	**NO**	**NO**
9	35	41	53	71	**NO**	**NO**
10	34	40	52	71	**NO**	**NO**
11	34	42	52	72	**NO**	**NO**
12	33	41	54	74	**NO**	**NO**
13	34	43	55	75	**NO**	**NO**
14	41	48	55	75	**NO**	**NO**
15	~~44~~45	55	55	75	**NO**	**NO**
16	~~45~~46	~~51~~57	53	75	**NO**	**NO**
17	43	~~49~~51	61	75	**NO**	**NO**

18	47	~~53~~59	55	74	**NO**	**NO**
19	41	50	55	74	**NO**	**NO**
20	47	55	62	75	**NO**	**NO**
21	47	58	60	75	**NO**	**NO**
22	~~51~~52	62	61	75	**NO**	**NO**
23	55	67	63	75	**NO**	**NO**
24	50	66	65	80	**NO**	**NO**
25	49	67	65	75	**NO**	**NO**
26	51	68	55	69	**NO**	**NO**
27	46	57	55	69	**NO**	**NO**
28	~~46~~47	57	55	69	**NO**	**NO**
29	40	50	55	69	**NO**	**NO**
30	34	39	55	69	**NO**	**NO**
Source: Bollard Acoustical Consultants, Inc. (2021).						

In neither case did the corrected tables result in identification of exceedance of the project's standards at any of the nearest potentially affected noise-sensitive receptors. Additional information pertaining to the more detailed comments contained in the Salter letter is provided in the specific responses to those comments below.

The project proposes several specific measures designed to minimize the transmission of sound from project operations and equipment into the neighboring community. Preliminary noise impact analysis revealed that noise control measures would be required of certain aspects of this project to satisfy the County's noise standards at nearby residences. As a result, the applicant elected to incorporate such industrial noise control measures into the project design and description so as to avoid impacts from the outset. Such "pre-mitigating" of a project's noise generation is common practice. The statement that the project fails to include assurances that the project will not result in noise impacts is incorrect. In fact, an extensive noise monitoring program will be required by Mitigation Measure 4.10-3 of the DEIR upon project start-up and thereafter for the expressed purpose of assuring compliance with the County's noise standards and avoiding noise impacts. Additional information pertaining to the more detailed comments contained in the Salter letter is provided in the specific responses to those comments.

In response to the question as to how blasting at the Brunswick site would be 20 dB quieter at the surface than at the Sutter Gold Site, the commenter is directed to the third and fourth paragraphs of page 58 of the noise analysis prepared for the project. Those paragraphs specifically state that the Sutter Gold shaft is horizontal, whereas the Idaho-Maryland Mine shafts are vertical. In addition, the Idaho-Maryland Mine portals will be smaller than the Sutter Gold shafts. Finally, the Idaho-Maryland Mine portals will be enclosed in buildings providing at least 20 dBA of sound attenuation, whereas the Sutter Gold portal was not. The net effect of these differences is expected to provide blast noise levels of a minimum of 20 dB lower than those generated at Sutter Gold.

Response to Comment Grp 21-130

Comment states that nighttime noise and sleep disturbance analysis should be included. As noted in the Response to Comment Grp 21-129 of this letter, nighttime noise is thoroughly addressed in the project's noise study. Appendix B of the project noise study (DEIR Appendix L) presents the results of 50 individual days of noise surveys representing 24-hour noise level measurements

(including every nighttime hour), conducted at 12 locations in the project vicinity. This extensive noise survey data was utilized to adjust the County's daytime, evening, and nighttime noise level standards to reflect the baseline ambient conditions so that noise impacts could be properly evaluated during all hours of the day. The results of those adjustments are contained in Table 6 of the project noise study.

As noted in Table 9 of the project noise study, off-site hauling would be limited to the hours of 6 am to 10 pm, effectively avoiding the sensitive nighttime periods when the potential for sleep disturbance would be greatest. The engineered fill activities occurring at both the Brunswick and Centennial Sites are proposed to occur between the hours of 7 am - 3:30 pm. While nighttime operations are proposed at the Brunswick Site, the most significant noise-generating activities would occur within sound-treated and insulated buildings. (DEIR 4.10-24.) Figure 10 of the project noise study (Figure 4.10-8 of the DEIR) clearly illustrates the nighttime noise generation of the Brunswick operations, disclosing that exterior noise levels during nighttime hours are predicted to be approximately 40 dBA or less at the nearest residences. Evaluations of sleep disturbance frequently focus on maximum instantaneous noise levels (Lmax), or sound exposure levels (SEL) for discrete individual events. As noted in project noise study Table 22 (Table 4.10-20 of the DEIR), predicted cumulative nighttime maximum noise exposure from all project noise sources would range from 15 dBA to 49 dBA Lmax at the nearest residences. These predicted nighttime maximum noise levels are an average of 39 dBA ***below*** the applicable nighttime maximum noise level standards. The closest any predicted maximum nighttime noise exposure would get to the applicable nighttime noise standard would occur at Receptor 16, where predicted maximum noise levels would be 19 dB ***below*** the applicable nighttime noise standard. These results confirm that significant nighttime noise impacts were not identified for this project and that additional analysis of nighttime noise exposure is unwarranted.

Response to Comment Grp 21-131

Commenter believes the calculated noise level from engineered fill operations would be greater than modeled in the DEIR. A description of engineered fill placement and compaction operations is provided on DEIR page 4.10-31. As noted in the last paragraph of this page, "maximum noise levels were predicted based on the closest proximity of the heavy equipment to each receptor whereas average noise levels were predicted based on the assumption that the earthmoving equipment would be spread out on the project site". As a result, the distances to the receivers shown in Table 4.10-14 are used to compute maximum noise levels at the nearest receptors, but not average noise levels at those receptors. Average noise levels associated with engineered fill operations at both the Brunswick and Centennial sites were computed assuming the fill areas were "area" noise sources within the SoundPlan noise prediction model, thereby placing the collective noise center of the engineered fill operations further from the boundaries of the fill operations. A sound power level of 120 dBA was applied to the area noise source representing the engineered fill operations (see Lw value of 120 dBA in Appendix F of the project noise study (contained within Appendix L of the DEIR). Because average noise levels associated with engineered fill operations were computed assuming the equipment would be spread out on the site (as will actually occur), computed average noise levels associated with engineered fill operations will be lower than computed maximum noise levels associated with that same equipment operating at the closest point to the residences. Table 1 of the Salter letter (incorporated here by reference), provides Salter's computations of noise levels from an 85 dBA noise source associated with engineered fill operations. The levels computed by Salter are based

on a sound level decay rate of 6 dB per each doubling of distance from the noise source, which is consistent with spherical spreading of sound from a point source of noise. However, spherical spreading of sound is only one factor affecting the propagation and attenuation of sound over distance and Salter ignored all other factors affecting attenuation. Other factors affecting sound attenuation which were considered in the SoundPlan model, but which were ignored by the Salter computations, include: atmospheric absorption, shielding by intervening topography or structures, ground absorption, and attenuation caused by tree cover (which is extensive in the area). Another reason the Salter levels were computed to be so much higher than the average noise levels reported in Table 4.10-14 of the DEIR is that Salter is comparing their computed worst-case maximum (Lmax) sound levels against computed average noise levels (Leq), which is not a consistent, apples-to-apples, comparison and will, of course, present a skewed result. CEQA does not require a worst-case scenario analysis, especially one based on maximum sound levels and assuming all equipment will be at the same location.

Response to Comment Grp 21-132

Please see Response to Comment Grp 21-131.

Response to Comment Grp 21-133

In this comment Salter appears to be recommending evaluation of noise impacts relative to median (L50) or background (L90) levels at the nearest receptors. However, the footnotes to Nevada County General Plan Table 9.1 (Noise Standards), which is reproduced as DEIR Table 4.10-4, contains the County's requirements for evaluating compliance with the County's noise standards. Footnote a of GP Table 9.1 specifically states: "Compliance with the above standards shall be determined by measuring the noise level based on the **mean average** of not less than three (3) 20-minute measurements for any given time period. Additional noise measurements may be necessary to ensure that the ambient noise level is adequately determined (emphasis added). Although median (L50) and background (L90) noise levels are lower than average (Leq) noise levels measured during the project's ambient noise surveys, the County's noise standards are provided in terms of averages (Leq) and maximum (Lmax) noise levels, not in terms of median or background noise levels. As a result, the evaluation of ambient conditions for this project focused on average and maximum noise levels, consistent with County noise standards. It should be noted that median noise levels and certainly background noise levels generated during engineered fill operations would be considerably lower than predicted average noise levels for those operations. As such, an evaluation of the project's noise impacts relative to median or background ambient conditions would require utilizing the project's median and background noise generation for a consistent comparison. However, because the County's adopted noise level standards are written in terms of average and maximum noise levels, the impact evaluation conducted for the project appropriately utilized measured average and maximum noise levels to establish baseline ambient conditions, and an evaluation using other descriptors would be inconsistent with the adopted County noise policy.

Please also see Response to Comment Grp 12-28.

Response to Comment Grp 21-134

This comment is similar to Comment Grp 21-133. As a result, the commenter is referred to the Response to Comment Grp 21-133.



Response to Comment Grp 21-135

Commenter believes the DEIR underestimates the potential noise impact from mining. The applicant is proposing that the Sound Transmission Class (STC) 54 construction be utilized where identified in the noise study. It is clear from the DEIR noise analysis that noise control measures would not only be required of this operation but that the applicant is proposing to implement those measures as part of project design and made a condition of approval of the project. (DEIR 4.10-24.) As such, the DEIR does provide the type of disclosure being requested in this comment. Please also see Response to Comment Grp 21-52.

Response to Comment Grp 21-136

Comment is concerning the use of an industrial silencer to provide sound attenuation for the ventilation fans. This comment is similar to Comment Grp 21-135. As with Comment Grp 21-135, the applicant is aware that high-performance industrial silencers would be required for the ventilation fans. As noted in this comment and as stated on Page 4.10-41 of the DEIR, "This reference noise level was projected to the nearest representative receptors to the Brunswick Industrial Site, including the effects of a **silencer providing comparable sound attenuation as the other industrial buildings proposed at the site** (emphasis added). Hence, the DEIR discloses that an industrial silencer is proposed for the shaft ventilation fans.

Response to Comment Grp 21-137

The commenter is concerned with the description of the water treatment plant components provided by the Project Applicant, and whether it is consistent with the project plans, which it is. (DEIR p. 4.10-42.) The 90 dBA noise level at a distance of 5 feet suggested in the Salter comment is irrelevant as the proposed water treatment plant building will be 8,500 square feet in size. Although noise levels within the water treatment plant building could perhaps reach 90 dB at a distance of 5 feet from certain operating equipment, the overall levels within the large building would be far lower. Based on the size of the building, interior noise levels within the water treatment plant building were projected to be approximately 75 dBA. The Salter comment fails to recognize that the predicted noise level of 28 dBA (or less) from the water treatment plant would be 27 dB ***below*** the nighttime noise level standard applicable at the nearest residence. As such, even using Salter's erroneous assumption that sound levels inside the water treatment plant would be 15 dB louder than identified in the DEIR, the resulting levels at the nearest residence would still be 12 dB ***below*** the applicable nighttime noise level standard at the nearest residence. Drawing C-100 and C-101 of Appendix K.4 of the DEIR shows the proposed location of mechanical equipment associated with the water treatment plant. As shown on Drawing C-100, the air/compressor blower for the aerator and the solid separation system are located in their own isolated room, which will allow for extensive enclosure for noise mitigation. Two finish water pumps are located outside of the water treatment building. These pumps would likely be centrifugal pumps and could be enclosed for noise attenuation, if necessary. A submersible pump would be located on the south end of the water treatment pond where an existing metal platform and vertical culverts designed for pump placement are present. This vertical culvert structure provides noise attenuation and could be further improved by installing a cover. The submersible pumps would likely be fully submerged underwater which further attenuates noise from the pump. The exact specifications of all equipment types and engineered enclosure are either not known at this time or could change. It is for this reason that CEQA does not require every piece of equipment to be specifically identified, only that the equipment be commercially available. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare*

(1999) 70 Cal.App.4th 20, 26.). Furthermore, Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded, operations shall cease until additional engineering controls can be implemented, as needed. The required mitigation measure will therefore ensure that any necessary engineering controls for reduction of noise from the compressor are implemented for the project.

As stated on page 4.10-43 of the DEIR, noise level measurements conducted by Bollard at the Auburn California Wastewater Treatment Plant determined that noise levels of approximately 50 dBA were recorded at a distance of 500 feet from the plant. This noise was generated primarily by pumps and an aeration system and therefore has some similarities to the proposed water treatment plant for the project. Based on a reference level of 50 dBA at 500 feet, the predicted level at the nearest residence 900 feet away would be approximately 45 dBA even without the building. This level would be satisfactory relative to the 55 dBA Leq nighttime noise level standard applicable at the nearest residence. Nonetheless, the water treatment plant building is proposed to be constructed of sound attenuating materials, as disclosed in the noise study prepared for the DEIR, to ensure compliance with County noise standards.

As such, no additional analysis of water treatment plant noise generation or revisions to the DEIR are considered to be warranted.

Response to Comment Grp 21-138

The comment states that all equipment must be specifically identified in the DEIR. As noted on Page 4.10-43 of the DEIR, the four diesel generators will be located inside of the generator building, and would be used for emergency power during interruptions to grid power from PG&E. The overall noise level within the generator building is estimated in the DEIR as being 105 dBA. The applicant is proposing that the STC 54 construction identified in the noise study Appendix D be utilized for this building and has incorporated the STC 54 rating into the project design. It should be noted that there are options for specific components of the generator and other project equipment, and because current equipment models may change by the time specific orders are placed for that equipment, the exact specifications of all equipment types are either not known at this time or could change. It is for this reason that CEQA does not require every piece of equipment to be specifically identified, only that the equipment be commercially available. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.). However, the estimated noise generation of the various equipment types are based on equipment substantially similar to that which will ultimately be utilized for the project. Generator enclosures, mufflers, and cooling air silencers are also commonly manufactured and can reduce noise from generators substantially in addition to the noise attenuation of the building. For example, a 1.2 MW Triton enclosed generator is reported to have a noise level of 70 dBA[10] at 7m distance. This is substantially les than the 105 dBA assumed in the analysis of the DEIR. Furthermore, Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County

[10] https://tritonpower.com/wp-content/uploads/2022/04/1425kVA-Triton-Rental-Grade-Diesel-Generator-TP-RV1425-T4F-RENTAL-TWIN-PACK.pdf

noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded, operations shall cease until additional engineering controls can be implemented, as needed. The required mitigation measure will therefore ensure that any necessary engineering controls for reduction of noise from the compressor are implemented for the project.

Response to Comment Grp 21-139

Page 4.10-43 describes the general parameters of the mine air compressor. Similar construction is proposed for the compressor building as for the generator building and other noise-generating components of the project. More specific information is not required by CEQA as engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) Large compressors used for underground mine air are sophisticated machines and enclosed units which provides noise attenuation without consideration of the building itself. For example, a 7 bar Atlas Copco compressor with 3,200 CFM capacity is reported to have a noise level of 75 dBA[11] at the workstation of the compressor. This is substantially les than the 110 dBA assumed in the analysis of the DEIR. Furthermore, Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded operations shall cease until additional engineering controls can be implemented, as needed. The required mitigation measure will therefore ensure that any necessary engineering controls for reduction of noise from the compressor are implemented for the project.

Response to Comment Grp 21-140

The County's approval of the project would not grant the applicant the ability to generate noise at ***any*** level in the neighboring community. Rather, the community will be protected against the potential for ***excessive*** noise by virtue of the fact that the applicant will be required to demonstrate compliance with the County's noise standards through a detailed noise monitoring program, which is a mitigation measure (Mitigation Measure 4.10-3) and will be a condition of approval for the project. As noted in the DEIR (page 4.10-43), the concrete sleeve of the silo and the headframe building is predicted to substantially reduce maximum noise levels generated by shaft-skipping operations. In addition to the steel cladding used to construct the headframe, the STC 54 metal building walls would provide additional attenuation of this noise source. The estimated shaft-skipping noise level is predicted to be attenuated to levels below 50 dBA Lmax at the nearest residences, which would be satisfactory relative to the County's applicable nighttime noise level standards.

Response to Comment Grp 21-141

The comment states that without requiring noise reducing measures it fails to protect the area from excessive noise. As stated above, the noise reducing measures, or “upgrades” as referred to by the commenter, are incorporated into the project design and the project is only approved with those upgrades included. Additionally, the conditions of approval for the project will require these measures. Please see Response to Comment Grp 21-52.

[11] https://www.atlascopco.com/content/dam/atlas-copco/compressor-technique/oil-free-air/documents/ga-355-500/2935036820%20GA%20355-500%20leaflet%20EN%20Antwerp_LR.pdf

Response to Comment Grp 21-142

Commenter opines that it does not agree with the DEIR's analysis regarding blasting vibrations. Please see Responses to Comments Grp 21-143 and Grp 21-144.

Response to Comment Grp 21-143

The project does not expose residents to 0.4 in/sec vibrations on a regular basis for the rest of their lives. Blasting activities are intermittent. As discussed in Chapter 4.10-4 of the DEIR and the PBS Technical Report, a maximum of 0.23 inches per second vibration is modelled where a longhole blast could occur directly beneath a receptor at 500 feet depth. Notwithstanding the rarity of this situation, such a blast might occur every three or four days between shift changes (7AM and 7PM) and would last for only seconds. This level of vibrations is approximately half of the 0.4 inches per second the commenter defines as "borderline unpleasant" based on Figure 3.10 from Bulletin 656. This level of vibrations would be "distinctly perceptible" and approximately 1/5th of the level considered "mildly unpleasant" based on the Caltrans table of human response to blasting ground vibration provided by the commenter. At 500 feet depth and a horizontal offset of 1,400 feet, such a longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec).

Regular drift round blasting, occurring approximately twice daily over several seconds, are modelled to result in a maximum of 0.14 inches per second vibration at a depth of 500 feet directly beneath a receptor. At 500 feet depth, and a horizontal offset of 900 feet, a drift round blast would be undetectable by blasting seismograph (PPV <0.05 in/sec).

Historic mining was completed to approximately 1600 feet depth and the majority of future mining would be below the historic mine. At this distance, regular drift round blasting and longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec) at receptor locations directly above the blast location. Commenter's characterization of blasting activities and vibration is misleading, assuming a near constant, standard and uniform ground vibration, but is contradicted by both the Technical Blasting Report and DEIR. As commenter states, 0.4 in/sec vibration limit might be appropriate in a short-term event. Episodic underground blasting no more than twice per day is a short-term event.

Response to Comment Grp 21-144

The comment suggests restrictions on evening and nighttime blasting vibration operations. Commenter fails to note that the project is not subject to regulations under the Surface Mining Control and Reclamation Act of 1977, which deals *exclusively* with the regulation of surface coal mining operations. Non-coal mining is regulated by each State under its own laws and regulations. Given the foregoing, it is not surprising that the OSMRE Blasting Guidance Manual also applies exclusively on surface blasting to uncover surface coal deposits. There is no analogy that can be drawn between surface blasting a coal mine under federal regulations and minor blasting 1600 feet underground under state regulations.

Blasting noise is discussed in Chapter 4.10-3 of the DEIR and the worst-case maximum noise levels at the nearest noise-sensitive receptors would range from 52 to 57 dBA Lmax. The range of predicted worst-case blasting noise levels of 52 to 57 dBA Lmax is below the daytime, evening, and nighttime dBA Lmax criteria at the nearest receptors.

As discussed in Chapter 4.10-4 of the DEIR and the PBS Technical Report, a maximum of 0.23 inches per second vibration is modelled where a longhole blast could occur directly beneath a

receptor at 500 feet depth. Historic mining was completed to approximately 1600 feet depth and the majority of future mining would be below the historic mine. At this distance, regular drift round blasting and longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec) at receptor locations directly above the blast location. Please see Response to Comment Grp 21-143.

As described in the PBS Technical Report, blasting normally occurs between shift changes at approximately 7AM and 7PM. This is normal practice in underground mining so that work heading can be ventilated before the new crew arrives at their work area. Minor blasting (such as misholes in drift rounds) could be done periodically during work shifts but would be only a single hole per delay versus the four assumed in the PBS Technical Report for drift round blasting, and consequently, would result in only 25% of the vibration produced by drift round blasting.

Response to Comment Grp 21-145

Commenter suggests that the noise study does not substantiate its conclusions regarding noise at the Brunswick site portal. On Page 58 of the project noise study (DEIR Appendix L), the following statement from the project blasting analysis is quoted in the discussion of air overpressure caused by underground blasting: "Air overpressure is caused by numerous factors including the explosive detonation, movement, and collapse of a mine face which are in open air. In underground mining, especially the type proposed at the Idaho-Maryland Mine, there would be no air overpressure produced on the surface. The blast would not cause this pressure wave to form or an audible sound produced. **The air overpressure from the underground blasting at the proposed mine would be zero**." (Emphasis added by BAC). As noted in the study, and in light of this statement, the conditions at the Sutter Gold Mine while informative in the study's conclusions, differ significantly from the Idaho-Maryland Mine. The assessment of maximum blasting noise levels at the mine surface based on blasting measurements conducted at the Sutter Gold Mine site is considered to be very conservative.

In response to the question as to how blasting at the Brunswick site would be 20 dB quieter at the surface than at the Sutter Gold Site, the commenter is directed to the third and fourth paragraphs of page 58 of the noise analysis prepared for the project (DEIR Appendix L). Those paragraphs specifically state that the Sutter Gold shaft is horizontal whereas the Idaho-Maryland Mine shafts are vertical. In addition, the Idaho-Maryland Mine portals will be smaller than the Sutter Gold shafts. Finally, the Idaho-Maryland Mine portals will be enclosed in buildings providing at least 20 dBA of sound attenuation, whereas the Sutter Gold portal was not. The net effect of these differences is expected to provide blast noise levels of a minimum of 20 dB lower than those generated at Sutter Gold.

Group Letter 22

March 30, 2022

To: Matt Kelley, Senior Planner
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950 Maidu Ave, Suite 170
Nevada City, CA 95959
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Email: matt.kelley@co.nevada.ca.us
DEIR Comment Email: idaho.mmeir@co.nevada.ca.us

Grp 22-1

The Sierra Foothills Audubon Society's mission is to educate ourselves and others to the variety and beauty of our natural environment and protect our wildlife and natural places. We are located in Nevada County and have over 1,000 members in Nevada County, Placer County, and Yuba County.

We are writing in response to the Draft Environmental Impact Report for the Idaho-Maryland Mine Project.

Biological Resources

Sierra Foothills Audubon has been supporting a bird banding study by Gold Country Avian Studies since 2018 at the Bennett Street Grasslands banding station within 1/2 mile from the proposed Idaho-Maryland Mine.

Section 4.4-2 of the DEIR states: "Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status wildlife species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Based on the analysis below and with implementation of mitigation, the impact is less than significant."

Grp 22-2

Page 4.4-31 -The only avian species called out in this section is the California Black Rail
Note: The landmark Rosenberg et al. study indicating that we have lost ~30% of our birds in the last 50 years, so we must not take actions that will put more bird species on a special status.

Page 4.4-38 "California black rail (Laterallus jamaicensis coturiculus) – CA State Threatened California black rail inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. The species requires water depths of approximately one inch that does not fluctuate during the year and dense vegetation for nesting habitat. Centennial Industrial Site: The species has been identified within five miles to the southeast and southwest of the Centennial Industrial Site. Suitable habitat for this species occurs within the large marsh wetlands within the eastern section of the Centennial Industrial Site, though these are anticipated to be removed during remediation activities. Nevertheless, as previously discussed, this action has already been analyzed in an independent CEQA document with DTSC as the lead agency.

However, out of an abundance of caution, in the event that the currently proposed remediation boundary limits were somehow modified by DTSC prior to commencement of remediation, this EIR addresses the possibility that some amount of freshwater emergent marsh wetland habitat may remain on the Centennial Industrial Site post-remediation."

We do not see the Draft EIR addressing actions for protecting habitat for this species.

Grp 22-3

Gold Country Avian Studies has submitted to the county, California Natural Diversity Database (CNDDB) detections of special status species in an email to county planner Matt Kelley on March 10, 2021 and attached a zip file of pdfs all submissions and a list of all bird species detected and captured at the site. There have been over 15 separate Special Status detections (of one or more individuals) submitted to CNDDB. A physical list of those detections was provided to all planners in a folder at the meeting.

The data indicates that the SF Wolf Creek may be used regularly during migration season by the endangered Willow Flycatcher, and species of special concern – Olive Flycatcher, Yellow-breasted Chat and Yellow Warbler.

Empidonax traillii willow flycatcher
State rank: S1/S2; critically imperiled/imperiled in the state at subspecies level (State listing of the full species includes all subspecies.)
CESA (California Endangered Species Act): Endangered
USFS: Sensitive
USFWS: Bird of Conservation Concern

Contopus cooperi olive-sided flycatcher
State rank: S3 vulnerable
CDFW: Species of Special Concern
IUCN: Near Threatened
NABCI: Yellow Watch List
USFWS: Bird of Conservation Concern

Icteria virens yellow-breasted chat
State rank: S3 = Vulnerable
CDFW: Species of Special Concern

Setophaga petechia yellow warbler
State rank: S3/S4 Vulnerable
CDFW: Species of Special Concern
USFWS: Bird of Conservation Concern

The DEIR must include recognition of these species as Special Status and protect them accordingly.

We ask that Rise Gold perform studies in all seasons to verify species that could be impacted by the mine both at Centennial and east Brunswick.

Grp 22-4

The Madrone Peer Review Report produced from a request of Raney concluded on page 8 for Cooper's Hawk that "for consistency we would recommend that the author add a sentence regarding the species' potential to occur within the study area. We feel that the potential to occur is high." Please add that sentence to the DEIR.

Hydrology and Water Quality

Mine Dewatering

Grp 22-5

Page 4.8-32 "As previously discussed, the proposed project includes mine dewatering and discharge of the treated groundwater to the South Fork Wolf Creek."

There is no discussion of impacts to avian species that changes in the volume and quality of water will have on the food obtained from the riparian habitat. The DEIR should address this issue.

Noise and air quality

Table 4.3-11 indicate 36,500 Engineered fill trucks trip per year plus 120,788 employee trips per year. This additional traffic on Centennial Drive and East Bennett Roads will cause excessive noise and air quality impacts that would affect nesting birds in the area.

Grp 22-6

In a study published in the January 2016 Proceedings of the National Academy of Sciences, researchers found that adults and nestlings of three bird species including the Western Bluebird showed multiple signs of chronic stress caused by noise pollution, including skewed stress hormone levels, due to increased anxiety, distraction, and hypervigilance.

The DEIR should address this issue.

Thank you for your consideration of these comments.

Donald L Rivenes

Donald L Rivenes
rivenes@sbcglobal.net
Conservation Chair
Sierra Foothills Audubon Society

GROUP LETTER 22: DONALD RIVENES, SIERRA FOOTHILLS AUDUBON SOCIETY

Response to Comment Grp 22-1
Comment noted. This is an introductory comment and does not pertain to an environmental issue in the DEIR.

Response to Comment Grp 22-2
Please see Master Response 37 - Birds and Raptors. As noted by the commenter, the California black rail was analyzed in the DEIR and Mitigation Measure 4-4.2(d) was provided to mitigate potential impacts. Note that the California Black Rail was considered to have a very low likelihood of presence onsite. The imposed mitigation measure requires both preconstruction surveys and preparation of a watercourse/wetlands/riparian management plan. The project has been designed to limit potential impacts to the riparian areas surrounding Wolf Creek and South Wolf Creek and no specific habitat protection measures are provided beyond the mitigation measures identified in the DEIR. Given the limited amount of surface disturbance to riparian areas that are commonly utilized by the California black rail, the very low likelihood of presence on the site, and implementation of the mitigation measures, this impact is considered less than significant.

Response to Comment Grp 22-3
Please see Master Response 37 - Birds and Raptors.

Response to Comment Grp 22-4
Comment noted. The DEIR already concluded that "[t]he Centennial Industrial Site and Brunswick Area contain many larger trees, several of which contain suitable habitat for nesting raptors, including suitable nesting sites for Cooper's hawk." (DEIR p. 4.4-76.) As such, potential for presence was already acknowledged by the DEIR, and the DEIR then concluded that "on-site removal of vegetation could result in adverse effects to nesting raptors and other birds protected under the MBTA should they be nesting on-site prior to commencement of construction." (Id.) As such, a potential impact to this species was already assumed by the DEIR. Mitigation Measure 4.4-2(g) was therefore included requiring preconstruction surveys and buffers from nests if the species is present.

Response to Comment Grp 22-5
Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 22-6
Noise impacts to wildlife and bird species was analyzed in Impact 4.4-2 and determined to be less than significant. Air Quality impacts were assessed in Chapter 4.3 of the DEIR and were found to be less than significant. The commenter provides no evidence that the project's incremental increase in regional emissions would cause significant impacts to bird species.

Group Letter 23

March 31, 2022

Matt Kelley, Senior Planner

Nevada County Planning Department

950 Maidu Avenue

Nevada City, CA 95959

Re: Idaho-Maryland Mine Project Draft EIR comments

To: Matt Kelley, Senior Planner

From: Barbara Rivenes, Sierra Nevada Group/Sierra Club

Grp 23-1 The Sierra Nevada Group of the Sierra Club has concerns about the Idaho-Maryland Mine re-opening in Nevada County. Some of our Group has worked with Community Environmental Advocates Foundation on their research of the Idaho-Maryland Mine Draft Environmental Impact Report findings. We would like to associate our comments with their submitted DEIR comments. However, we also have a few more specific comments and discussion to add here.

Grp 23-2 As part of the Sierra Club which is our nation's largest and most influential grassroots organization with millions of members and supporters, the Sierra Nevada Group serves approximately 1400 members in Nevada, Yuba and Sierra counties. Our mission includes working to promote clean energy, safeguard the health our communities and protect wildlife through activism, public education, lobbying and legal action.

The California Environmental Quality Act (CEQA) is an important tool to help communities understand the scope and impact of a project being proposed. As such, it requires that all the information regarding the proposed project be examined and found to be complete and answer all the questions that could arise should the project be approved. In the case of the Idaho-Maryland Mine re-opening, clearly a large industrial venture will pose a considerable impact on its rural residential neighbors and the nearby city.

Grp 23-3 The release of the Idaho-Maryland Mine DEIR enumerated the number of impacts the re-opening would have. That number was a staggering 83 potential impacts with 3 that would not be able to be mitigated and the other 80 were considered to be significant or less than significant and could be successfully mitigated below that level.

Following are a few of the incomplete and inadequate responses to the impacts raised in the Draft EIR and ones that we have serious concerns regarding.

Grp 23-4

CEQA issues: CEQA requires the DEIR to identify the whole of the project's activities as a single and complete project in order to analyze its potential impacts. The full project includes the use of the toxic laden Centennial property as a repository for "engineered fill" from the mine. It assumes that the property will have been cleaned up in advance, but does not discuss this clean-up and its impacts as part of the project. Those environmental impacts rightfully need to be described, enumerated and counted as part of the entire project. A CEQA requirement is to identify the "whole" of the project as single and complete project and should not have parts excluded. It could lead to an underestimation of impacts and not inform the public of the actual harm this project could cause.

The Centennial cleanup is not a stand alone project and the considerable impacts of grading, traffic, air quality and wetland disturbance associated with it should be added to the project as a whole. It is a serious failure of the Draft EIR not to have incorporated the impacts of the Centennial site cleanup as part of the project.

Grp 23-5

Noise: Calculations regarding the changes in noise levels in the Brunswick industrial site where the actual mine entrance is located along with various mine and waste processing, two silos, mine dewatering and filtration pond, truck loading and unloading and most of the employees was found in the DEIR calculations not to exceed normal decibels. The project's location is surrounded by a rural residential neighborhood with generally low ambient noise thresholds.

An expert in noise and vibration analysis noted that this project includes many operations that will occur at nighttime hours. In addition, many of the nearby sensitive receptors are located away from notable sources of ambient noise and therefore receive very low nighttime background noise. The project's noise levels could be 20 to 35 decibels louder than the current median/background ambient noise levels, causing a severe impact. The DEIR fails to address sensitive receptors located farther away.

Grp 23-6

Groundwater: Groundwater resources are extreme concern. The proposed Project would significantly affect local groundwater resources by dewatering the mine thereby lowering groundwater levels. The DEIR recognizes that 242 well owners will be affected, but assumes others in the vicinity will not be dramatically effected, but merely have their wells lowered a couple of feet. Looking forward to positive indications of drought and future climate change, this arbitrarily low impact threshold is invalid.

Grp 23-7

The mitigations proposed are inadequate with respect to the number of affected well-owners in the large area of uncertainty. Monitoring should be required for at least three years.

Grp 23-8

Further, the groundwater modeling done for the DEIR is limited to a very narrow region. More basic data needs to be gathered and a valid groundwater hydrological model must be built. These and other pressing groundwater issues need to be rectified in the DEIR and possibly recirculated.

The above are just a few of the 83 impacts which have not been adequately addressed by the proponents.

Grp 23-9

Conclusion: 482 citizens came to a Planning Commission meeting on the Idaho-Maryland DEIR and about 100 people spoke. Each shared their legitimate concerns about either the inadequacies of the report or of the outsized impact that a large industrial project will have on some neighborhoods in particular or the ambience of the area in general.

Machines rumbling around beneath homes, blasting, trucks laden with toxic dust particles (impossible to contain), nighttime noise/glare, 7 stories of "engineered fill" on two properties within ¼ mile of a city of 36,000 people.

Grp 23-10

A creek, Wolf Creek and South Fork Wolf Creek, borders each of these mine properties and will be impacted by dewatering and being used as a conduit for used mine water.

The overall environmental damage is significant and cannot be adequately mitigated.

Thank you for your attention to my comments on behalf of the Sierra Nevada Group of the Sierra Club.

Barbara L. Rivenes

Barbara Rivenes, Vice-chair

GROUP LETTER 23: BARBARA RIVENES, SIERRA NEVADA GROUP OF THE SIERRA CLUB

Response to Comment Grp 23-1
This is an introductory comment. The commenter acknowledges their concurrence with comments provided by Community Environmental Advocates. Please see responses to Group Letters 7 and 8. Responses to specific comments are provided below.

Response to Comment Grp 23-2
The commenter provides a summary of its membership and mission. Comment noted.

Response to Comment Grp 23-3
The commenter expresses general concerns regarding the project and the findings of the DEIR. Please see Master Response 1. The commenter's specific comments are addressed below.

Response to Comment Grp 23-4
The commenter states that the Centennial cleanup is not a separate project. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 23-5
The commenter states that an expert in noise noted that the project noise levels could be 20 to 35 decibels louder than current ambient noise levels, causing a severe impact. Please see Response to Comment Grp 21-130 and 21-133. The commenter states that the DEIR fails to address sensitive receptors located father away but provides no information on these sensitive receptors. Noise impacts to sensitive receptors have been appropriately evaluated in the DEIR. See Chapter 4.10 of the DEIR.

Response to Comment Grp 23-6
The commenter mischaracterizes the DEIR when stating that the DEIR "recognizes that 242 well owners will be affected" by the project. The analysis of the DEIR concludes that proposed mining operations could result in significant effects to seven domestic water supply wells (see page 4.8-66 of the DEIR).

The commenter states the threshold for impact to domestic water wells used in the DEIR is invalid due to drought and climate change. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. The commenter asserts that the impact threshold used to determine significant dewatering impacts is "arbitrary" and "invalid" but does not suggest a different threshold nor explain why the threshold is inappropriate. The commenter implies that a drawdown of a few feet would be significant, but a drawdown of this level would likely have no impact on groundwater well function. In addition, as noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Grp 23-7
The commenter states that mitigation for well owners is insufficient and monitoring should be required for at least three years. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has provided

a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Grp 23-8

The commenter states that more data needs to be gathered to build a valid groundwater model. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Grp 23-9

The commenter states that other impacts in the DEIR have not been adequately addressed and other commenters have concerns with the DEIR and the project. The commenter provides no specifics on these inadequacies and is directed to Section 4 of the DEIR and Master Response 1. The commenter's specific comments are addressed above in Responses to Comments Grp 23-1 to Grp 23-8.

Response to Comment Grp 23-10

This is primarily a conclusory comment. For concerns related trucks and dust, see section Impact 4.3-2 of Chapter 4.3, and Mitigation Measure 4.3-2 (Asbestos Dust Mitigation Plan) of the DEIR. The commenter's opposition to the project will be provided to the County decision makers for their consideration.

Group Letter 24

Jeff Lauder, PhD
Executive Director
Sierra Streams Institute
117 New Mohawk Rd., Suite H
Nevada City, CA 95959

April 4th, 2022

Mr. Matt Kelley
Senior Planner
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Nevada City, CA 95959-7902 (530) 265-1423
Via email: Idaho.MMEIR@co.nevada.ca.us

Mr. Kelley:

SSI is a regional watershed science organization based in Nevada City, California, dedicated to increasing watershed stewardship capacity throughout the Sierra Nevada region.

Our mission is to promote scientific knowledge and stewardship of Sierra Nevada watersheds through research, restoration, education, and community science.

Grp 24-1

We work with local, state, and federal agencies as well as universities and community groups to find solutions to the problems that afflict Deer Creek, Bear River and other watersheds throughout the region that share the challenges resulting from a century and a half of gold mining, development, and agriculture. SSI's emphasis on rigorous science and consistent data collection provides the basis for restoration decisions that are made on behalf of watersheds, and makes us an especially valuable partner of local, state and federal government agencies who lack the funding and capacity to gather their own data.

The following letter summarizes Sierra Streams Institute's (SSI) comments on the Draft Environmental Impact Report (DEIR) that relate to some of our areas of research and expertise.

Grp 24-2

1. The hydrologic analyses of the impacts of flow from dewatering discharges to the South Fork of Wolf Creek are insufficient to assess effects on the benthic aquatic life of the stream, and need to provide data on the existing conditions upstream and downstream of the point of discharge (reference to Chapter 4.8 of the DEIR) and the effects of long-term sustained high flows from dewatering discharges to this small creek.

SIERRA Streams INSTITUTE

Grp 24-3

2. Chemical analyses given in Tables 4.8-2 and Appendix K2 Table 3.6 are incomplete and inadequate to evaluate toxicity of the mine dewatering effluent before and after treatment and must report real values with improved analytical detection methods and value ranges from locations throughout the drowned mine workings.

Grp 24-4

3. The long-term impact of Arsenic (As) is of concern since it is a human carcinogen and aquatic toxin. Figure 4.7-1 indicates that less than half of the Brunswick site was sampled for toxic metals. The number of samples and data on As levels in current mine water, as well as levels of As in existing rock and tailings at the Brunswick site are insufficient. Page 590 and Figure 4.7-1 discusses elevated levels of As at one part of the Brunswick site. The report says "*the material beneath this southeastern paved area was likely imported to the site and did not originate from mining operations at the Brunswick Mine Shaft*". This is speculation and more areas of the site need to be assessed for toxic metals including As.

Grp 24-5

4. The DEIR fails to address the hazardous conditions of the Centennial site and respective actions. Hazardous levels of As, lead, nickel, cyanide (free), nickel and mercury (a neurotoxin) are located in the soil of the Centennial site. There is currently no proposed plan in the DEIR that connects the cleanup of this site to its proposed use for depositing engineered fill. Heavy metal content of the engineered fill is needed to properly assess risk. Long-term contamination should be a concern for water resources and appropriate handling is required. Of note is that post-project Superfund cleanup of nearby Lava Cap site has cost more than one million dollars per year so far for the past decade. Centennial cleanup would likely be similar in expense (cost estimates come directly from EPA).

Thank you for consideration of our comments

Sierra Streams Institute

117 New Mohawk Rd. Ste. H Nevada City, CA 95959 (530) 470-6037

GROUP LETTER 24: JEFF LAUDER, SIERRA STREAMS INSTITUTE

Response to Comment Grp 24-1
Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

Response to Comment Grp 24-2
Please see Master Response 35 - Discharge to South Wolf Creek and Master Response 36 - Flows in South Fork Wolf Creek. As explained in detail in those Master Responses, discharge into South Wolf Creek was extensively analyzed looking at the potential degradation of water quality, increase in erosion, and increase in flow. These impacts were all considered less than significant. Please also see Response to Comment 31-12 regarding benthic macroinvertebrates.

Response to Comment Grp 24-3
The commenter characterizes the chemical analysis information provided in DEIR Chapter 4.8, Hydrology and Water Quality, as "incomplete and inadequate" but does not provide explanation. Subsection 4.8.4 of Chapter 4.8 provides a summary of the groundwater sampling used to analyze existing water quality and identify water treatment measures. A detailed discussion of groundwater sampling to characterize existing water quality is found in section 3.4, Water Quality, of Appendix K2, "Groundwater Hydrology and Water Quality Analysis" prepared by Dr. Andy Kopania of EMKO Environmental. As discussed in these two documents, groundwater samples occurred on three separate occasions to identify overall water quality. Samples were taken from various depths within the New Brunswick shaft and from the drains where groundwater drains from underground workings. Water quality sampling locations are found on Sheets 2 and 3 of Appendix K2. Water samples were provided to California Laboratory Services, a lab certified with the California State Water Resources Control Board (SWRCB), to conduct the analysis. Appendix K2, Tables 3.5 – 3.9, provide the field parameters measured and laboratory analytical results for the samples collected. The result of the water sampling provided in these tables are "real values" based on extensive and representative sampling of the existing groundwater.

Response to Comment Grp 24-4
Please see Response to Comment Grp 24-3 above regarding water sampling conducted for this project.

The commenter questions whether sufficient analysis of arsenic was conducted. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill. As explained in DEIR sections 4.7.4 and 4.7.2, a Phase I and II was conducted by NV5 and a second Phase I was conducted by the County's consultant, ECM. As stated on DEIR page 4.7-20, the overall purpose of the Phase I and II studies "was to provide Nevada County with knowledge of the full range of environmental issues and liabilities associated with the project sites and satisfy requirements of American Society for Testing and Materials (ASTM) Standard E1527-13, the CERCLA, and Innocent Landowners, Standards for Conducting All Appropriate Inquiries (40 CFR part 312)."

DEIR Figure 4.7-1 shows soil sampling locations conducted by NV5 on the Brunswick property. As discussed in subsection 4.7.2, NV5's Phase II analysis included excavation of 36 exploratory trenches, collection of mine waste and soil samples, and laboratory analysis for metals. NV5 obtained 68 samples from the 36 exploratory trenches. The samples were delivered to ACZ Laboratories, Inc. and analyzed for total arsenic (EPA Method 6010B). In addition, a subset of eight samples was analyzed for total concentrations of Title 22 (CAM 17) metals (EPA Methods 6010/7471) and Acid Base Accounting (ABA; Modified Sobek). Arsenic concentrations detected in mine waste samples were relatively low except for the mixed soil and rock fill beneath a five-

acre paved area near the Brunswick Road entrance, within approximately 300 feet southwest of Brunswick Road, as depicted in Figure 4.7-1, which contained total and soluble arsenic concentrations that exceeded regulatory benchmarks (i.e., the total threshold limit concentration [TTLC] for arsenic of 500 milligrams per kilogram [mg/kg]).

Due to the elevated arsenic levels, the DEIR identified a potentially significant impact and required Mitigation Measure 4.7-2(a). Mitigation Measure 4.7-2(a) requires that if disturbance of the mine waste beneath the southeastern paved area within the Brunswick Industrial Site is proposed as part of the project, the site-specific arsenic concentration data resulting from the Phase I/II ESA prepared by NV5 for the proposed project shall be furnished to the project contractor(s) so the contractor(s) can comply with applicable health and safety requirements accordingly. The project contractor(s) shall retain a Certified Industrial Hygienist to develop specific handling procedures for the mine waste, including dust mitigation. Mine waste shall not be removed from the site without regulatory approval by the RWQCB or DTSC. Verification of proper handling and disposal of the mine waste shall be provided to the Nevada County Planning Department. As such, appropriate levels of sampling for arsenic and other chemicals has already been performed, and appropriate mitigation has been required to ensure impacts are less than significant.

Response to Comment Grp 24-5

The commenter asserts that the DEIR fails to address the conditions of the Centennial site and the cleanup project. Please see Master Response 4 - Cleanup Project is a Separate Project under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Group Letter 25

SOUTH YUBA RIVER CITIZENS LEAGUE

April 4, 2022

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RE: Nevada County Idaho-Maryland Mine Draft Environmental Impact Report

The South Yuba River Citizens League (SYRCL) respectfully submits comments and recommendations for the Draft Environmental Impact Report (DEIR) as required by the California Environmental Quality Act (CEQA) for Rise Gold Corporation s (Rise Gold) proposed re-opening of the Idaho-Maryland Mine (Project or Mine)[1]. We request that these comments be received regarding the substance of the environmental review and the potential impacts of an active gold mine on our watersheds and community.

Grp 25-1

In summary, SYRCL s comments are focused on the following resources, as defined in CEQA, that will be impacted by the Project:

- Agriculture and Forestry Resources
- Air Quality, Greenhouse Gas Emissions, and Energy
- Biological Resources
- Hydrology and Water Quality

[1] County of Nevada, Community Development Agency, Planning Department (2022). Draft Environmental Impact Report. *Idaho-Maryland Mine Project.* Prepared by Raney Planning and Management, Inc.

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SYRCL appreciates the 30-day extension by the County granting additional time for the public to review and provide comments on this matter. Robust public engagement is vital to truly assess the environmental impacts of this Mine to our community and precious waterways.

Introduction

SYRCL was founded in 1983 by grassroots activists determined to protect the South Yuba River from dams. Ultimately, SYRCL won permanent protections for 39 miles of the South Yuba River under California s Wild and Scenic Rivers Act. Today, SYRCL is the central hub of community activism to protect, restore, and celebrate the Yuba River watershed. With 39 years of achievements, 3,500 members and 1,000 active volunteers, SYRCL is doing great things for the Yuba and Bear River watersheds. Some of our work includes restoring wild salmon populations and habitat, headwater meadow restoration, and large-scale forest health and fire resiliency planning.

Grp 25-2

SYRCL is committed to advocating for long-term solutions for a sustainable water future in the Yuba River watershed, especially in light of the climate crisis.[2,3] The negative environmental impacts of gold mining range from water, soil, and air pollution to large-scale seismic instability and extraordinary unmitigated energy consumption. In California, outdated and ineffective land management strategies and the impacts of climate change have further exacerbated the historical environmental impacts from mining. Each of the important potential environmental issues are explored in more detail below. SYRCL is watchdogging the Project due to negative mining impacts within the Yuba and Bear River watersheds from past operations and analysis from recently proposed projects to reopen gold mines within the watershed; therefore, SYRCL has grave concerns about future mining activities.

SYRCL encourages the County to utilize the wealth of community and organizational resources during this environmental review process and welcomes additional consultation.

[2] See South Yuba River Citizens League Strategic Plan, 2019-2023. https://yubariver.org/strategic-action-plan/

[3] IPCC, 2021: Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. In Press. *Accessed online at:* https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM_final.pdf?msclkid=640609b1b45911ecBe0e2d36b3d8146d

I. Overarching Comments

Two projects, one set of impacts

Grp 25-3

Separating the Centennial Industrial Site Remedial Action Plan project impacts from the Idaho-Maryland Mine project impacts misrepresents the impacts that will be experienced by the community. While it is reasonable that the California Department of Toxic Substances Control is Lead Agency for the Centennial Site Remedial Action Plan, separating these two directly related projects misrepresents the fundamentally linked impacts that Grass Valley and Nevada County will, factually, endure. As stated in the Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR) "...engineered fill would be transported by truck from the Brunswick Industrial Site and placed on approximately 44 acres of the Centennial Industrial Site to create approximately 37 acres for potential future industrial use." At minimum, traffic, dust, and noise impacts will be considerable. Dividing project impacts across two functionally linked "sub-projects" serves only to conceal or reduce the significance of impacts.

The 'Substantial Evidence' and 'Practicable and Reasonable' Standards

Grp 25-4

While CEQA analysis may only need to meet a standard of 'practicable and reasonable' in developing data, analysis, and determining the level of significance of impacts, the State CEQA Guidelines (guidelines) first require meeting a standard of 'substantial evidence.'[4] The guidelines state, "The findings required ... shall be supported by substantial evidence in the record."[5] Substantial evidence, "...means *enough relevant information and reasonable inferences from this information* that a fair argument can be made to support a conclusion..." [emphasis added]. Many of the specific concerns identified below point to inadequate and insufficient data or information used to draw conclusions. The 'practicable and reasonable' standard must be considered in the context of (1) making data available, or (2) characterizing data, to ensure there is 'substantial evidence' in the record for the lead agency and community to make an informed decision. The guidelines also state, "The draft EIR which is sent out for public review must reflect the independent judgment of the lead agency. The lead agency is responsible for the adequacy and objectivity of the draft EIR."[6]

Risk embedded in uncertainty is 'relevant information'

Risk is embedded in the decision-making process when conclusions are made in the absence of adequate information. Drawing foundational conclusions about significance of

[4] *For CEQA guidelines, see* 14 CCR § 15384 (a)(b)
[5] *See* 14 CCR § 15091 (b)(a)
[6] *See* 14 CCR § 15084 (e)

impacts based on non-existent, small, or outdated data, or inadequately characterized uncertainty exacerbates risk. There are many examples throughout the DEIR of this failing, some specifically identified below, which must be corrected or properly characterized. Without such a characterization, decision makers and the community cannot fully understand the risks associated with relying on the conclusions. Explicitly articulating uncertainty and the inherent decision risk to which it leads is, as stated in the guidelines, "... relevant information and reasonable inferences from this information..."[7]

The DEIR must articulate the uncertainty underlying conclusions that have been based on inadequate or insufficient data or information. The DEIR, as written, leaves it to the reader to decode and comprehend the decision risk embedded in the uncertainty resulting from the use of inadequate information. The DEIR must either provide demonstrably statistically significant data sets to support its conclusions, or specifically articulate the nature and extent of the uncertainty of the conclusions in a statistically correct manner.

Downstream impacts

The DEIR does not consider downstream impacts of the Project, and instead wrongly narrows its environmental analysis to only the Project footprint. Due to the nature of biological resources, especially streams and rivers, this narrowed approach is unfounded and does not capture direct Project impacts to downstream ecological communities[8].

Grp 25-5

Groundwater pumping will result in increased flows in South Fork Wolf Creek and will have several negative environmental impacts. Increased flows will cause channel scouring, which will alter aquatic communities, especially macroinvertebrate communities. Macroinvertebrates are a food source for many aquatic species and are essential food for salmonid species. Additionally, increased flows will cause changes to water chemistry and turbidity, which will affect vegetation communities and wildlife habitat. It is inappropriate to narrow environmental impact analysis to only the geographic boundary of the Project when it will have direct impacts to biological and other resources downstream. These impacts must be assessed so they may be mitigated.

Below we reference several instances where downstream impacts were not considered.

Grp 25-6

I. Agriculture and Forestry Resources

[7] *See* 14 CCR § 15384(a)
[8] Richey, J. E., & Swanson, F. J. (1989). The river continuum concept: a basis for the expected ecosystem behavior of very large rivers?. In Proceedings of the International Large River Symposium. Can. Spec. Publ. Fish. Aquat. Sci (Vol. 106, pp. 49-55).

An impact indicated in the DEIR[9] is the potential loss of forest land or conversion of forest land to non-forest use. The DEIR claims this impact is *less than significant,* however, it provides no clear indication of how the threshold of significance" is determined. In fact, the DEIR states that 25 acres of forest land would be lost on the Project site. No clear line of logic or facts are cited to support this determination, aside from speculation. Further, overall character of forestry resources was not assessed on the Project site, meaning no data about forest quality, health, or age of stands (including old growth) were used in this determination.

Additionally, the analysis of cumulative impacts ignores major factors affecting Sierran forests, including forest loss due to disease and pests, climate change, drought stress, and the current reality for Sierran forests—catastrophic wildfire[10]. The Project would undoubtedly contribute to the loss of California forests. Discussion of cumulative impacts to Agriculture and Forestry is incomplete without a thorough assessment of impacts in the above context.

II. Air Quality, Greenhouse Gas Emissions, and Energy

Grp 25-7

The DEIR has insufficient mitigation measures to reduce NOx, ROG, and PM10 emissions to a less-than-significant" level[11]. The proposed measures are the very minimum required by the local regulatory agency responsible for air quality management and only reduce these emissions for a one-year period. These emissions should be monitored and mitigated for the entire 80-year lifetime of the Project, and the DEIR should include a proposal that proves mitigation efforts would consistently reduce emissions to a less-than-significant level.

Grp 25-8

Additionally, asbestos and silica are toxic air contaminants that will become respirable due to mining operations[12]. There is no identified safe" threshold for these air pollutants[13], meaning any amount of these materials in the air is a danger to human health. Asbestos and silica have been inappropriately categorized as *fugitive dust*[14], which subverts regulations for toxic air contaminants. If regulated as fugitive dust, toxicity and cumulative effects are not considered, which is a danger to local public health. Asbestos and silica must be

[9] *See* DEIR sec. 4.2-3 (p. 4.2-18)
[10] Paudel, A., Coppoletta, M., Merriam, K., & Markwith, S. H. (2022). Persistent composition legacy and rapid structural change following successive fires in Sierra Nevada mixed conifer forests. Forest Ecology and Management, 509, 120079.
[11] *See* DEIR sec. 4.3-1 (p. 4.3-66 thru 4.3-79)
[12] *See* DEIR sec. 4.3-1 (p. 4.3-61)
[13] *See* 40 CFR Part 61, Subpart M (EPA Asbestos National Emission Standard for Hazardous Air Pollutants)
[14] *See* DEIR sec. 4.3-1 (p. 4.3-61)

considered as toxic air contaminants to ensure proper mitigation and to limit impacts to human health.

Grp 25-9

Due to extreme wildfires in California, our community is already enduring severely compromised air quality much of the year. Ensuring this project will not contribute further to dangerous air quality is essential to protect the health of our community and the environment.

III. Biological Resources

Grp 25-10

The analysis of Biological Resources in the DEIR is insufficient because there is an overall lack of sufficient references to appropriately recent data and science. In many instances the only information cited to support conclusions are general references made to decades-old reports or poorly executed surveys onsite. In other instances, no site-specific data is used to support conclusions of "low likeliness"—even when conditions would reasonably suggest high probability for a species to occur (i.e., suitable habitat exists onsite, and the species is known to occur near the Project site).

The DEIR also insufficiently analyzes impacts to Aquatic Resources and Riparian Habitat. Specifically, the DEIR does not include analysis of impacts to ecologically connected downstream resources and understates the significance of impacts to Riparian Habitat.

Grp 25-11

SYRCL appreciates the third-party peer review of the biological resources reports prepared by Greg Matuzak Environmental Consulting because it improves objectivity and transparency. However, SYRCL concurs with issues noted by the peer review[15]. One such issue is the timing of the special-status plant surveys, which were conducted during seasons where plants are not present or blooming. The proposed solution, which is to conduct additional surveys before ground disturbance, is not adequate unless it provides the same opportunity for public input as this environmental review.

We describe the above issues in more detail below.

Vegetation Communities and Special Status Plants

Grp 25-12

The DEIR s analysis of endangered plant species relies heavily on a single outdated report from 1973[16]. Using this report, especially as a primary source of information, is unreasonable and does not constitute 'substantial evidence.' Local climate has shifted drastically from the 1970s, and changes in environmental conditions must be accounted for

[15] *See* DEIR sec. 4.4.1 (p. 4.4-1)
[16] *See* DEIR sec. 4.4-1, Table 4.4-5 (p. 4.4-22), "a report in 1973"

when considering which special status species may exist on the Project site. The environmental analysis of special status plants should use the best available science and data, or appropriate and current survey methods to capture an accurate understanding of onsite resources. It is unscientific and unreasonable to conclude that a species has "low likeliness to occur" if underlying data is flawed or lacking. Several conclusions were made, specified below, without any site-specific data at all. Asstated in our 'Overarching Comments' section above, this does not meet the CEQA guideline 'substantial evidence' standard.

Grp 25-13

Additionally, the special-status plant surveys were conducted outside the blooming period for many special-status plant species with potential to occur in the Project area. In fact, vegetation communities which are the foundation of habitat for several special status species can be found throughout the project site. Although the DEIR states that follow up surveys will be required before any ground disturbance, the lack of accurate baseline information is concerning, and does not meet the 'substantial evidence' standard. Any additional surveys should occur as part of the DEIR process and include ample time for public review and comment. At minimum, the DEIR should state the uncertainties or confidence level of conclusions. Specific issues with the analysis of this resource are as follows:

Grp 25-14

- The DEIR did not indicate what native plant species exist in the understory of each listed forest type[17].

Grp 25-15

- Project impacts were noted as *significant* for the federally endangered Pine Hill Flannelbush[18], a beautiful species native to the region. Eighteen individual flannelbushes would be destroyed as a direct result of Project operations. Although mitigation measures have been proposed, (such as seed collection, transplantation, and monitoring), the main goal should always be to prevent loss, rather than mitigating for it afterward. Mitigation is not always effective or monitored adequately. Additionally, cumulative impacts of the Project on the species were not considered.

Grp 25-16

- Finger Rush, a native species in the Project region, was considered to have a low potential to exist on the site[19]. This conclusion is unreasonable and unsupported by evidence because (1) the plant occurs less than one mile away, and (2) surveys were completed outside key identification period.

[17] *See* DEIR sec. 4.4.2 (p. 4.4-5 thru 4.4-10)
[18] *See* DEIR sec. 4.4.2 (p. 4.4-24 thru 4.4-25)
[19] *See* DEIR sec. 4.4.2 (p. 4.4-27)

7

Grp 25-17

- Sierra blue grass, a native species in the Project region, was considered to have a moderate potential to exist on the site[20]. This conclusion is unreasonable because this species thrives in lower montane coniferous forest, which is a dominant vegetation community on the Project site. Additionally, it is unclear if field surveys occurred during key identification periods.

Grp 25-18

- The Dubious pea, a CNPS List 3 species was surveyed outside its key identification period[21]. Therefore, the conclusion that it has low potential to occur because it was not identified during the surveys is unreasonable.

Grp 25-19

- The DEIR improperly excluded Layne's ragwort from analysis.

Aquatic Resources and Riparian Habitat

The DEIR improperly asserts that a baseline for the Centennial Industrial Site aquatic resources cannot be established due to the planned remediation efforts[22]. Although the DEIR states that disturbance acreages were conservatively estimated, shifting and unclear baselines are inappropriate for environmental analyses.

Grp 25-20

California has lost roughly 97% of its historic wetland habitat[23]. The remaining wetland and riparian habitat are hotspots for biodiversity in California, with many endemic and migratory species using this habitat for some part of their life history[24]. Further, riparian- and wetland-dependent species are being listed as threatened or endangered at higher rates than terrestrial species[25]. Therefore, any impacts to this precious resource should be very closely considered in environmental analyses due to the amplified consequences of impacts. Indeed, the DEIR lists many impacts to riparian habitat, including permanent fill at the Centennial site, Project encroachment on Wolf Creek, and loss or disturbance of over one-half acre on the Brunswick site[26]. Downstream wetlands and riparian habitat should also be included. Although the DEIR claims impacts will be less than significant with mitigation, it provides no clear evidence to support this claim[27]. Not only must mitigation measures be adequate, but they also must cover downstream impacts and provide

[20] *See* DEIR sec. 4.4.2 (p. 4.4-27)
[21] *See* DEIR sec. 4.4.2 (p. 4.4-29 thru 4.4-30)
[22] *See* DEIR sec. 4.4.2 (p. 4.4-10)
[23] Nelson, Charles et al. "The Central Valley Historic Mapping Project." California State University, Chico, Department of Geography and Planning, Geographic Information Center, Apr. 2003. Accessed at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/docs/cmnt081712/sldmwa/csuchicodptofgeographyandplanningcentralvalley.pdf
[24] Mittermeier, Russell A., et al. Fresh Water: The Essence of Life. CEMEX, 2010.
[25] Reis, V., Hermoso, V., Hamilton, S. K., Ward, D., Fluet-Chouinard, E., Lehner, B., & Linke, S. (2017). A global assessment of inland wetland conservation status. Bioscience, 67(6), 523-533.
[26] *See* DEIR sec. 4.4
[27] *See* DEIR Table 2-1

evidence that they will be effective. If uncertainty exists about effectiveness of mitigation measures, the DEIR must articulate these uncertainties.

Grp 25-21

Further, the DEIR excluded from its analysis (1) the Western Ridged Mussel, a sensitive aquatic species that could be impacted by degraded water quality from mining operations, and (2) the Vernal pool fairy shrimp.

Special Status Wildlife

Grp 25-22

Several conclusions about special status wildlife are based on reconnaissance-level" biological surveys[28]. This survey method provides only general information on the presence or potential presence of sensitive species. This method is based only on information available at the time of the survey and onsite conditions that were present on the date(s) the site was visited. Reconnaissance-level surveys should be considered a preliminary effort, where more due diligence is necessary to understand with confidence the presence or absence of special status wildlife in the Project area. The following special status wildlife species were evaluated with only reconnaissance-level information:

- California black rail[29]: The DEIR's conclusion that this species has low likeliness to occur is unreasonable because (1) reconnaissance-level surveys are not 'substantial evidence' to support this conclusion, (2) the species has been identified within 5 miles of the Project area, (3) suitable habitat exists onsite, and (4) this is a highly mobile species.

Grp 25-23

- Foothill yellow-legged frog[30]: The DEIR's conclusion that this species is unlikely to occur is unreasonable because (1) reconnaissance-level surveys are not 'substantial evidence' to support this conclusion, and (2) suitable habitat for this species exists just downstream of the project within an area that would be directly impacted by project operations[31].

Grp 25-24

Additionally, the DEIR unreasonably concluded that the following species are unlikely to occur in the Project area.

- Townsend's big-eared bat[32] (p. 433): The DEIR unreasonably concluded that this species has low potential to occur within the Project area. However, it occurs less

[28] *See* DEIR sec. 4.4.2 (p. 4.4-36 thru 39, 52 thru 53)
[29] *See* DEIR sec. 4.4.2 (p. 4.4-39)
[30] *See* DEIR sec. 4.4.2 (p. 4.4-37)
[31] Public comment by Bear Yuba Land Trust staff at the County of Nevada, Planning Commission, meeting regarding the Idaho-Maryland Mine DEIR. March 24, 2022.
[32] *See* DEIR sec. 4.4.2 (p. 4.4-36)

than three miles away from the Project area and suitable habitat exists on the Project site. Further, onsite habitat was not even surveyed. Thus, it is unreasonable to conclude that this species has low likeliness to occur onsite when a population exists so close to the site, and suitable habitat is available onsite. Site-specific data and monitoring are necessary to support such a conclusion.

- Hoary bat and Pallid bat[33]: – The DEIR concludes that these species are unlikely to occur on the Project site. In reaching this conclusion, it references recent data (a CDFW report from 2019), but the conclusion that both have low likeliness to occur seems unreasonable without site-specific data. An onsite survey should be conducted to support this conclusion because suitable habitat exists onsite.

Grp 25-25

The DEIR excludes several aquatic wildlife species that could be impacted by project operations. Steelhead, Rainbow trout, Chinook salmon, and North American green sturgeon all rely on the Bear River below Camp Far West Reservoir for critical habitat that supports their continued survival. These listed species are particularly affected because they are vulnerable to low flows, increased sedimentation, and toxic contamination. Additionally, soil erosion also increases fine sediment in streams, damaging spawning and rearing habitat for salmon downstream, such as the local spring-run Chinook salmon.

Grp 25-26

Lastly, the DEIR unreasonably excludes several species listed under the California Endangered Species Act (CESA). The Willow flycatcher (listed as Endangered under CESA) is a riparian bird that has been documented only two miles downstream of the project site at a Bear Yuba Land Trust Conservation Easement and was not analyzed in the DEIR[34]. Bears, deer, and mountain lions have also been documented using the South Fork of Wolf Creek. The DEIR is incomplete without a thorough analysis of potential impacts to these species.

IV. Hydrology and Water Quality

Grp 25-27

Hydrology and Water Quality has been poorly analyzed in the DEIR. The Overarching Comments section above describes, generally, issues with this resource analysis. Here, we describe these issues in more detail.

The hydraulic analysis only considers existing onsite conditions and doesn't consider climate change precipitation scenarios. Modeling efforts need to account for extreme variability, especially considering the 80-year lifetime of this project.

[33] *See* DEIR sec. 4.4.2 (p. 4.4-39)
[34] Public comment by Bear Yuba Land Trust staff at the County of Nevada, Planning Commission, meeting regarding the Idaho-Maryland Mine DEIR. March 24, 2022.

Grp 25-28

Additionally, in its analysis of Hydrology and Water Quality, the DEIR fails to draw meaningful conclusions between an observation or set of observations and an appropriate response. An example of this occurs when discussing Flooding[35]. This section indicates the project site is located within a FEMA Special Flood Hazard Area (SFHA). There is no discussion about how this magnitude of flood risk could impact mine operations, and no discussion about how the Project could impact the SFHA potentially increased flood crest elevation. The DEIR should model how the project will alter the FEMA Special Flood Hazard Area in aggregate of all development within the SFHA upstream and downstream of the project site. The model must analyze if surface water elevation will not increase beyond the FEMA designated thresholds. The DEIR must also discuss how the presence of infrastructure relevant to the project footprint could be affected by flooding, especially those areas used as part of water treatment.

Issues with Water Quality

Grp 25-29

- The DEIR does not disclose or discuss any surface water quality data. Without baseline information about water quality in South Fork Wolf Creek, changes in water quality due to mine operations can't be measured or adequately evaluated.

Grp 25-30

- The DEIR does not address legacy mining impacts. The mercury lost to the environment during the hydraulic mining era still persists in and continues to cause health advisories throughout the Sierra Nevada, including the Bear River. Unfortunately, due to use of mercury in hydraulic mining, loss of mercury during the Gold Rush was estimated to be 10 to 30 percent per season,[36] totaling about 10,000,000 pounds across California[37]. Many parts of the Yuba and Bear River watersheds are listed as impaired due to mercury contamination under the Clean Water Act Section 303(d), including the confluence of Wolf Creek and Bear River, which is downstream of the Project[38]. During rain events these areas contribute to elevated levels of metals and sediments in our local streams and rivers. The Project could increase sedimentation and erosion, and has the potential to disturb contaminated land. The DEIR should (1) analyze whether Project operations will contribute to legacy mining impacts that already exist within and around the Project

[35] *See* DEIR sec. 4.8.2 (p. 4.8-24)
[36] Bowie, A.J. 1905. A practical treatise on hydraulic mining in California: New York, Van Nostrand, p. 313.
[37] Churchhill, R.K.. 2000. Contributions of mercury to California's environment from mercury and gold mining activities; Insights from the historical record, in Extended abstracts for the U.S. EPA sponsored meeting, Assessing and Managing Mercury from Historic and Current Mining Activities, November 28-30, 2000, San Francisco, Calif., p. 33-36 and S35-S48.
[38] *See* 33 U.S. Code § 1313 (d).

area, and (2) Rise Gold should prepare an adequate mitigation plan for legacy mining impacts before, during, and after project operations cease in 80 years.

Grp 25-31

- The DEIR does not adequately analyze potential impacts of using Ammonium Nitrate on water quality[39].

Grp 25-32

- The DEIR does not discuss the extent of contamination in the historic flooded mine tunnels, and does not describe, with adequate detail and specificity, how the water will be treated. These omissions may result in serious health consequences for our community.

Issues with Hydrology

Grp 25-33

- The DEIR uses point in time hydrologic measurements and fails to identify when those measurements were taken with more specificity than month and year[40]. The frequency and timing of hydrologic measurements in low-order stream systems is paramount to understanding water quality. Without specificity in sampling timing, it is impossible to know the range of baseline conditions. Without specific and hydrologically relevant sampling, the DEIR is missing essential information necessary to analyze impacts.

Grp 25-34

- The hydrologic analysis only considers existing conditions[41]. It does not consider changes to impervious surfaces (e.g., parking lots and buildings). Additions of such surfaces would result in shorter lag-times and a flashier hydrograph—which means water moving faster through developed areas of the project have less opportunity to be absorbed into the soil. More swift surface water will contribute to greater rates of erosion. Planned changes, which would impact project effects on hydrology, should be accounted for in this analysis.

Grp 25-35

- The groundwater analysis lacks the necessary spatial and temporal rigor to conclusively state that "... there are not any direct connections... between the domestic wells and any of the underground mine workings."[42] The difference between seasonal variation in residential water elevations and those observed at the New Brunswick Shaft (Figure 4.8-5) do not conclusively prove that there is no hydrologic connection between the mine and residential wells. Ground water follows the same laws of physics as surface water but with significantly slower

[39] *See* DEIR p. 4.3-56
[40] *See* DEIR sec. 4.8.2
[41] *See* DEIR sec. 4.8.2
[42] *See* DEIR sec. 4.8.2 (p. 4.8-13)

response times to external signals (e.g., rainfall) and changes in porosity (e.g., fractures). Changes to porosity, such as that caused by mine shafts, will fundamentally alter the nature and magnitude of the signal that groundwater may respond to. The argument that because groundwater elevations are not changing in unison across space and through conditions with different porosity in no way proves that there is not a hydrologic connection. The DEIR does not demonstrate that there is no groundwater connection between the existing mine shafts and future mine shafts, and potentially impacted residential wells. To conclude otherwise has placed the cart firmly before the horse—complete and accurate modeling efforts must guide this analysis in order to provide 'substantial evidence' for these conclusions.

Grp 25-36

- Related to the above bullet, the DEIR analysis of groundwater seepage, draw down, and depression cone[43] does not appear to address future conditions. Analysis and modeling by EMKO and Itasca use analytical models which rely on "current seepage into the shaft" (EMKO) and "current conditions" (Itasca) when modeling the groundwater cone of depression. However, current conditions represent the tunnels as full of water. When drained as part of operations, the slope of the hydraulic gradient line will steepen thus increasing the rate of seepage into the tunnels and alter the groundwater cone of depression. For an adequate analysis of this resource, these future conditions should be addressed.

Grp 25-37

- The DEIR inappropriately uses annual precipitation rates based on *historic data* rather than predicted climate change scenarios[44]. Local hydrology has already changed compared to historic data and will continue to change. Precipitation is expected to shift from snow- to rain-dominated with greater inter-annual variability.[45] A model that appropriately incorporates climate change must account for longer periods of drought with infrequent high intensity rain events and consider low, medium, and high greenhouse gas emissions scenarios and regionally relevant assumptions. Further, this type of analysis should be done for all portions of the DEIR that address impacts to surface and/or ground water, including water use and use impacts as related to existing water infrastructure.

Grp 25-38

- The DEIR estimates that there are 1,118 acre-feet (385,000,000 gallons) of water in the mine[46]. It estimates it would take 160 days to pump all water out of the mine, which suggests a pumping rate of approximately 10 acre-feet (2.4M gallons) of

[43] *See* DEIR sec. 4.8.2 (p. 4.8-19 thru 21)
[44] *See* DEIR sec. 4.8.2 (p. 4.8-37)
[45] Swain, D. L., Langenbrunner, B., Neelin, J. D., & Hall, A. (2018). Increasing precipitation volatility in twenty-first-century California. Nature Climate Change, 8(5), 427-433.
[46] *See* DEIR sec. 4.8.2 (p. 4.8-42)

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water per day. The onsite retention pond capacity is 40 acre-feet, or 23 acre-feet with two feet of freeboard. Therefore, the retention pond only has approximately two days of processing storage assuming a maintained two feet of freeboard. Two days of storage is a very small threshold in terms of hydrologic events, especially with climate change expectations and increasing occurrences of atmospheric rivers, such as the October 2021 rainfall events. The following bullets list concerns and unanswered questions regarding groundwater pumping and pond capacity.

Grp 25-39

- How fast will water be treated? Anything less than 2.4M gallons per day means the pond will fill faster than it's being treated. If the pond fills, will they slow or stop pumping? Additionally, how, when, and by whom are those decisions made and enforced?

Grp 25-40

- It is unclear how rainfall is considered as related to pond capacity. When and if the pond fills, what are the protocols to prevent overflow and mitigate the risk of catastrophic overflow or failure of the pond walls caused by rapid erosion?

Grp 25-41

- Freeboard of two feet is only enough to accommodate a 24-hour 100-year storm, but it has tight margins (Two-foot freeboard holds 6.6 acre-feet, and a 100-year storm modeled 5.7 acre-feet). After 24 hours, little room will remain in the storage pond, assuming it does not rain in the days leading up to and after the 100-year 24-hour storm. 100-year precipitation events are often longer than 24 hours, with some lasting for days[47]. The small buffer in storage is likely to result in spill of untreated water during major precipitation events.

Grp 25-42

- The DEIR does not address settling of solids or fill rate in the pond. Although it mentions cleaning every 10 years, there is no information on how that interval was calculated[48]. Rather than a time-bound cleaning cycle, the DEIR needs to clarify what conditions trigger the need for cleaning and clearly outline all of the metrics which will be considered as necessitating cleaning, what thresholds in each metric dictate the need for cleaning, and how, by whom, and with what frequency will each metric be monitored and enforced.

Grp 25-43

- How quickly can processing rates be ramped up or down as related to precipitation or other changing conditions? Additionally, what emergency backup protocols are in place? The project should have emergency shut offs

[47] Swain, D. L., Langenbrunner, B., Neelin, J. D., & Hall, A. (2018). Increasing precipitation volatility in twenty-first-century California. Nature Climate Change, 8(5), 427-433.
[48] *See* DEIR sec. 4.8.2 (p. 4.8-42)

for groundwater pumping if sensors detect pond water surface elevation has exceeded an unspecified safety threshold. Additionally, groundwater pumping rates should automatically decrease if processing slows. In addition, the DEIR should clarify how changes in pumping rates will impact the rate at which mine shafts re-flood and what safety protocols are in place for personnel working underground and the community if planned clean up cannot occur prior to evacuation of the mine shafts.

Grp 25-44 The above issues and questions must be addressed in order to provide 'substantial evidence,' as required by the CEQA guidelines. The DEIR lacks evidence to support conclusions that water treatment facilities and protocols are adequate under future climate change conditions and 80 years of operation. Without more information, the public can't understand hydrologic risks associated with the project, and these risks can't be properly mitigated and managed over time.

VI. Appendix N: Water Supply Assessment

Grp 25-45 The Water Supply Assessment[49] is deeply flawed and based on inaccurate assumptions. The claim that Rise Gold would be a net water producer" is false and misleading and ignores the body of science that proves that surface and groundwater are fundamentally linked[50]. Surface and groundwater, together, constitute the water bank" for our community. With the large number of well owners per capita and continued drought in the County, mining activities are likely to have a major impact on water security in the region.

Grp 25-46 The Assessment claims, without substantial evidence, that operations would only impact 31 wells[51], while past analyses to reopen the mine estimated an order of magnitude more wells would be impacted for a smaller project[52]. The flaws in the underlying assumptions must be addressed in order to ensure no County residents will lose access to fresh water they currently enjoy.

Grp 25-47 The DEIR states that, to mitigate for possible impacts to groundwater wells, municipal water will be installed for any home that could be potentially impacted. Nevada Irrigation

[49] *See* DEIR Appendix N: Water Supply Assessment
[50] Levy, Zeno et al. "Groundwater Quality in the Yuba River and Bear River Watersheds, Sierra Nevada, California." US Department of the Interior, United States Geological Survey. September 2017. Accessed at: https://pubs.usgs.gov/of/2017/1115/ofr20171115.pdf
[51] *See* DEIR Appendix N: Water Supply Assessment, p. 9
[52] County of Nevada, Community Development Agency, Planning Department (2008). Draft Environmental Impact Report. *Idaho-Maryland Mine Project.* More information about this project can be found here: https://www.mining.com/emgold-moves-forward-with-idaho-maryland-project-permitting/#:~:text=Emgold%20is%20in%20the%20advanced%20stage%20of%20permitting,followed%20by%20the%20original%202005%20Project%20Permit%20Applications.?msclkid=814d9c3bb46611ecca7d0c1c2e9c08ebb

District (NID) has confirmed it has enough water to supply the 31 homes that the DEIR currently estimates based on flawed analysis (likely a gross underestimation). If 300+ wells are affected, as has been modeled in the past, there is no guarantee that NID would be able to supply that water. Additionally, the long-term plan for the new municipal water infrastructure is unclear. Would Rise Gold be responsible for maintaining the infrastructure? Will residents' water rates be subsidized or paid by Rise Gold if water rates are more expensive than well pumping costs? Who is responsible for maintaining infrastructure if Rise Gold goes out of business? And lastly, how will new construction not already connected to City or NID service within the Project s groundwater impact zone get water?

Grp 25-48

VII. **Conclusion**

We appreciate the County's time and dedication to improving the environmental review of this project. We also appreciate the robust public participation and the opportunity to provide written comments on this Draft Environmental Impact Report. At this time, there are still severe and dangerous deficiencies with the DEIR—our community needs a thorough evaluation to understand the potential environmental impacts of the Idaho-Maryland Mine in the context of past and proposed future gold mining operations.

Grp 25-49

We welcome the opportunity to provide further input or to further support the County's environmental review efforts. For coordination, clarification, or discussion of any issues raised in this letter, please do not hesitate to contact our Executive Director, Melinda Booth, or Policy Manager, Keiko Mertz, by email or phone (530-265-5961).

Sincerely,

Melinda Booth, Executive Director
melinda@yubariver.org

Keiko Mertz, Policy Manager
keiko@yubariver.org

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GROUP LETTER 25: KEIKO MERTZ, SOUTH YUBA RIVER CITIZENS LEAGUE

Response to Comment Grp 25-1
Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Please see below responses to comments.

Response to Comment Grp 25-2
Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

Response to Comment Grp 25-3
Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 25-4
The commenter characterizes the legal standard for "substantial evidence" under CEQA. Comment noted. The commenter asserts that the DEIR's conclusions are based on inadequate data, and must disclose the risks associated with the nature of the data used. This comment is general in nature and does not point to specific errors with the DEIR. The DEIR is a good faith attempt by the County to provide a comprehensive description of the project, identification of project's impacts based on substantial technical study and analysis, enforceable mitigation measures, and potential alternatives that could reduce significant impacts. The DEIR was based upon almost 40 technical studies that were peer reviewed by the County and/or the County's independent experts. These technical studies included analysis of aesthetics, water quality, biology, cultural resources, and numerous others and served as the foundation for the DEIR's impact analysis, significance determinations, and mitigation measures. The County believes the level of technical analysis supporting the impact analysis and significance determinations represent substantial evidence that will allow the decision-makers to make informed decision making about the environmental impacts of the proposed project.

Response to Comment Grp 25-5
Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, Master Response 38 - Foothill Yellow Legged Frog and California Yellow Legged Frog, and Master Response 35 - Discharge to South Wolf Creek, and Response to Comment Grp 31-12 regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 25-6
As discussed in Chapter 4.2.1 of the DEIR, Existing Environmental Setting (subsection Forest Resources), the project site is not zoned for forest land or timberland uses. The project site does have lands meeting the definition of forested land (10 percent or more of native tree cover) and timberland (available for, or capable of, growing a crop of trees). As noted in Impact 4.2-3, the amount of forest and timberland converted by this project is insignificant compared to the available forest and timberland resources in the County and Statewide. For example, the conversion of 25 acres within the project site is approximately 35% of the resources within the project site, and less than 1/10 of 1 percent of the County forestlands per the General Plan. The EIR correctly concluded this impact is less than significant.

Response to Comment Grp 25-7

Please see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations. As discussed in Master Response 19, the project incorporates all mitigation measures required by the NSAQMD to reduce impacts related to NOx, ROG and PM10 to a less than significant level; and also includes applicant proposed measures such as use of Tier-4F engines which further reduces impacts. The County has concluded that the project's NOx, ROG and PM_{10} impacts are less-than-significant after incorporation of NSAQMD measures and the applicant proposed measures.

Response to Comment Grp 25-8

The commenter asserts that health risk from asbestos and silica were not considered and that the DEIR mis-analyzed these substances as fugitive dust. The commenter's assertion is incorrect. Asbestos and silica (crystalline, respirable) are included in the Air Toxics Hot Spots program and are analyzed in the Health Risk Assessment used for the DEIR in accordance with OEHHA guidelines.

As stated on page 4.3-42 of the DEIR, the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA are consistent with what are used for the AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. OEHHA has developed chronic reference exposure level (REL)'s for assessing noncancer health impacts from long-term exposure. OEHHA has established a REL for Crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter). A chronic REL is an airborne level of a chemical at or below which no adverse health effects are anticipated in individuals indefinitely exposed to that level. As discussed on page 4.3-79 and shown in Table 4.3-21 of the DEIR, the threshold of significance for chronic exposure is a Hazard Quotient of 1. The Chronic Hazard Quotient is equal to the annual average concentration at the receptor location divided by the Chronic REL. The Health Risk Assessment prepared for the project's DEIR concludes that the non-cancer chronic health risk, which includes silica, to the most sensitive receptor will be below these thresholds (see Table 4.3-21 of the DEIR).

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions and Master Response 21 – Conservatism of Silica Assumptions.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

Response to Comment Grp 25-9

Please see Master Response 1.

Response to Comment Grp 25-10

Please see Master Response 30 - Biological Study Technical Adequacy, regarding the level of biological technical study prepared for this project. It should be noted, the DEIR included a twelve-page appendix with over 150 references. In addition, each biological technical report included as an appendix to the DEIR includes a references section.

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 25-11

The commenter asserts that the analysis of biological resources in the DEIR is inadequate because the biological studies ae inadequate, old and not site-specific. Please see Master Response 30 - Biological Study Technical Adequacy, Master Response 33 - Groundwater Dependent Vegetation, Master Response 37 - Birds and Raptors, Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, and Master Response 36 - Rare Plants.

Response to Comment Grp 25-12

The reference to 1973 included in Table 4.4-5 referenced by the commenter is the last time an occurrence of that species was identified and reported to CNDDB. The CNDDB was queried in 2019, and supplemental information contained in the CNDDB includes when records were reported; in this case the records were reported in 1973. This information is pertinent to the analysis as it provides an understanding of how widespread the species may occur in the region. Please see Master Response 30 - Technical Study Adequacy, discussing the significant amount of site-specific technical study and peer review that informed the DEIR.

Response to Comment Grp 25-13

Please see Master Response 31 - Rare Plants, and Master Response 30 - Biological Study Technical Adequacy.

Response to Comment Grp 25-14

Appendices F-6 and F-11, botanical surveys for the Centennial and Brunswick Industrial Sites, included a full list of plant species identified during on-site surveys as Appendix A to each report.

Response to Comment Grp 25-15

As the commenter notes, Pine Hill flannelbush will be impacted by the proposed project. Mitigation Measure 4.4-1(a) includes requirements for a Habitat Management Plan in order to mitigate impacts to the species. The commenter does not identify any specific deficiencies with the analysis or mitigation measures other than a preference for avoidance. It should be noted the project was designed to avoid the majority of Pine Hill flannelbush onsite, as shown on DEIR Figure 4.4-9. The commenter asserts that cumulative impacts related to Pine Hill flannelbush were not considered in the DEIR; however, this is incorrect. Cumulative impacts to special-status species including Pine Hill flannelbush were analyzed in Impact 4.4-6 of the DEIR, in which impacts were considered not to be cumulatively considerable.

Response to Comment Grp 25-16

Please see Master Response 31 - Rare Plants.

Response to Comment Grp 25-17

Please see Master Response 31 - Rare Plants. As discussed in Appendix F-11, Table 1, the closest species occurrence is seven miles to the east and last identified over 50 years ago. This species was not identified during rare plant surveys during 2019 and 2020.

Response to Comment Grp 25-18

Please see Master Response 31 - Rare Plants. As discussed in Appendix F-11, Table 1, the closest species occurrence is three miles from the study area and last identified over 90 years ago. This species was not identified during rare plant surveys during 2019 and 2020.

Response to Comment Grp 25-19

Layne's ragwort, a CNPS 1B.2 list species, has not been previously mapped within 5 miles of the project site per the most recent CNDDB update (expires on November 1, 2022), nor is it included in the most up to date 9 quad CNDDB search (9 Quad CNDDB search with Grass Valley Quad as central quad run on April 20, 2022). Additionally, it has never been documented in Nevada County in the CNDDB. The species blooming period is between April and August and was not identified within the project site during surveys conducted in July and August 2019 and in June 2022. Given the species was not known as a special-status plant species that has previously occurred within either 5 miles of the project site or within the 9 quad CNDDB search, and given the local botanists with 15+ years of local experience each that conducted botanical and special-status plant surveys within the project area had no previous knowledge of the species being located within the greater Grass Valley region, the species was not considered as a focal species in the pre-survey background research. However, given the species was not identified within the project site during the blooming period for the species in 2019 and 2022, the species is considered absent from the project site and the project will have no impact on the species.

Response to Comment Grp 25-20

Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

The DEIR demonstrates that the potential impacts to riparian habitat are mitigated to a less than significant level through implementation of mitigation measures 4.4-3(a-d). These measures include but are not limited to implementation of Watercourse/Wetlands/Riparian Areas Management Plans for the Centennial Industrial Site and Brunswick Industrial Site, avoidance or compensatory mitigation

Response to Comment Grp 25-21

The project area does not contain vernal pools, and therefore, habitat for vernal pool fairy shrimp is not present within the project area. As a result, they were not assessed within the DEIR. The western ridged mussel is not listed by either the state or federal Endangered Species Act, and is not a California species of concern. This species does not have sufficient rarity to be considered special-status and require analysis under CEQA. Furthermore, even if this species was listed in the future, the species has not been documented to occur in Nevada County. The project will have no impact on vernal pool fairy shrimp and no impact on the western ridged mussel.

Response to Comment Grp 25-22

Please see Master Response 37 - Birds and Raptors, and Master Response 30 - Biological Study Technical Adequacy.

Response to Comment Grp 25-23

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog and Master Response 30 - Biological Study Technical Adequacy.

Response to Comment Grp 25-24

The DEIR (see Impact 3.4-4) conservatively concludes a potential impact to bat species despite determining bat species have a low likelihood of occurring onsite. Mitigation Measure 4.4-2(f) provides extensive detail regarding the survey of bats, specifically that surveys shall occur no more than seven days prior to surface disturbance, reporting requirements if bats are not found, passive removal if bats are identified, and avoidance until breeding roosts have dispersed. This mitigation measure allows for potential bats to be identified, prevented from returning to disturbance areas, and/or avoidance of bats to limit the potential for impact. As a result, this impact was considered less than significant following mitigation.

Response to Comment Grp 25-25

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Given that the project will not adversely impact water temperature, water quality or cause increased sedimentation movement or erosion, and will not result in low flows, the project will not cause adverse impacts to the fish species mentioned by the commenter.

Response to Comment Grp 25-26

Please see Master Response 37 - Birds and Raptors, regarding the willow flycatcher. Bears, deer, and mountain lions are not special-status species and therefore, were not included in the DEIR.

Response to Comment Grp 25-27

The commenter states generally that hydrology and water quality were not adequately analyzed in the DEIR, and that the DEIR should consider climate change precipitation scenarios. The impact on water quality and hydrology of climate change is speculative as there is no consensus on whether climate change will result in reduced or increased recharge in certain areas of California and to what extent and when that impact will occur. Please see Master Response 16 – Drought and Climate Change. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As analysis of the project and climate change's combined impacts on hydrology and water quality amounts to speculation, no further response is necessary. Nonetheless, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm event. In addition, the County EIR consultant prepared a water supply assessment (WSA) for the proposed project (see Appendix N), the information from which is presented in DEIR Chapter 4.11. The WSA evaluated the adequacy of NID's total projected water supplies, including existing water supplies



and future planned water supplies, to meet the existing and projected future water demands, including those future water demands associated with the proposed project, under all hydrologic conditions (Normal Years, Single Dry Years, and Multiple Dry Years) (see DEIR page 4.11-8). As such, the DEIR hydrology analysis made every attempt to conservatively analyze project conditions under both heavy rainfall and drought conditions where appropriate.

Response to Comment Grp 25-28

The commenter asserts that the DEIR failed to analyze impacts related to a portion of the project site within the FEMA special flood hazard area (SFHA). However, this comment mischaracterizes the extent of the FEMA SFHA and misunderstands the discussion within the DEIR. The discussion in the DEIR specifically cited in this comment (page 4.8-24 in Chapter 4.8.2) states:

> "…the only part of either project site that is located within a flood hazard zone is the northern edge of the Centennial Industrial Site along Wolf Creek."

As discussed in Impact 4.8-3 (at page 4.8-74), any placement or grading of materials to create usable industrial areas on the Centennial Site would occur outside of flood hazard zones. Given that the project will not encroach on the SFHA, there would be no effect on the hydrology of Wolf Creek and no further analysis is needed.

Response to Comment Grp 25-29

The commenter asserts that the DEIR does not include any baseline data for surface water quality; however, this statement is incorrect. Baseline surface water quality data are discussed on pages 4.8-23 and 4.8-24, based on a more detailed discussion in Section 3.4.1.2 of Appendix K.2 of the DEIR. The data are presented in Tables 3.8, 3.9, and 3.10 of Appendix K.2. The surface water quality data are evaluated further in Section 3.4.2 and plotted on Figures 3-12, 3-17, 3-18, and 3-19 of Appendix K.2.

Response to Comment Grp 25-30

The commenter asserts that the DEIR fails to account for legacy mining impacts, and specifically that the DEIR did not consider mercury impacts on the Property as a result of historic hydraulic mining. However, hydraulic mining never occurred at the Idaho-Maryland Mine site and there is no evidence that mercury was ever used at the site. Therefore, there are no known legacy impacts to which the project could contribute. Furthermore, the water samples collected from the New Brunswick shaft, and from Wolf Creek in 2018, were analyzed for a range of total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and mercury. These analyses include the suite of industrial chemicals that could potentially occur as a result of legacy mining operations at the site and other adjacent past industrial activities. Other than the occurrence of cis-1,2-dichloroethylene, there were no detections of any other organic chemicals or mercury. As stated on page 4.8-21 of the DEIR, the compound cis-1,2-dichloroethylene (cis-1,2-DCE) is detected in all samples from the New Brunswick shaft at concentrations ranging from 1.8 µg/L to 4.2 µg/L. This compound generally occurs as a breakdown product of the industrial solvent trichloroethylene (TCE) or the dry-cleaning solvent tetrachloroethylene (PCE). Neither of these parent compounds were detected in any of the water samples. The presence of cis-1,2-DCE in the water samples from the New Brunswick shaft could be due to two potential sources. One potential source is historic solvent use within the New Brunswick mine for equipment repair or maintenance. The second potential source is seepage of shallow groundwater into the New Brunswick shaft from the adjacent former SPI Mill site, located to the southeast. The Mill site was known to have industrial solvent impacts, including cis-1,2-DCE, in shallow groundwater in the past. If future mining activity disturbs areas where some unknown residual chemicals currently reside, the monitoring required

under the Central Valley Water Board WDR permits (see Mitigation Measure 4.8-1(a)) would detect any exceedances of water quality standards and the treatment systems would need to be adjusted, if necessary, to maintain compliance with discharge requirements.

Response to Comment Grp 25-31

As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As stated on page 4-5 of Appendix K.4, low concentrations of NH3 may occur as a result of explosives used during periods of active mining and will be removed by the aeration process. If required, the efficiency of this aeration can be enhanced by increasing the pH. This will generate more of the gaseous form of NH3 which can be stripped from the water. Therefore, as a contingency component for Fe (and Fe/As), Mn, and ammonia treatment, sodium hydroxide (NaOH) will be included in the permitting efforts for pH adjustments should it become necessary to add alkalinity to the water for Fe (along with Fe/As) and Mn treatment, or to treat NH3 more efficiently or in higher concentrations than have been previously detected. In regard to ammonia treatment, this may occur as a result of explosives used during periods of active mining. Also see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 25-32

As discussed in the Response to Comment Grp25-30 above, the water samples collected from the New Brunswick shaft, and from Wolf Creek in 2018, were analyzed for a range of total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and mercury. These analyses include the suite of industrial chemicals that could potentially occur as a result of legacy mining operations at the site and other adjacent past industrial activities. Appendix K.4 of the DEIR provides the Water Treatment Plant Design Report, upon which the analysis of potential effects from mine dewatering and treated water discharge is based, in part. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Grp 25-33

The commenter asserts that the DEIR is inadequate because the hydrologic measurements are provided with month and year, but not day. However, the commenter does not explain how the requested information relates to an impact that was not disclosed or mitigated under CEQA. As stated in Chapter 4.8.1 of the DEIR, the information upon which the hydrology and water quality analysis is based is provided in Appendices K.1 through K.9 of the DEIR. Details regarding the dates and times of the hydrology measurements are provided in Appendices K.1 and K.2. Appendix I of Appendix K.2 includes a near-continuous (15 minute) streamflow data recorded since January 24,2020 at South Fork Wolf Creek.

Response to Comment Grp 25-34

The commenter asserts that the DEIR failed to consider the impacts of impervious surfaces and the associated hydrology impact, and instead only considers baseline conditions. The analysis in Chapter 4.8.2 of the DEIR, as referenced by footnote 41 in this comment, presents the existing environmental setting, also referred to as baseline conditions, consistent with CEQA. Analysis of



the effects of planned changes that would occur as a result of the project, including parking lots and other impervious surfaces, are provided in Section 4.8.4, and are also discussed in Appendices K.1, K.2, and K.5 of the DEIR.

Response to Comment Grp 25-35

The commenter asserts that the DEIR does not include adequate data and analysis to prove that there is no connection between the groundwater wells and the underground mine workings. The discussion on page 4.8-13 of the DEIR, as referenced in footnote 42 in this comment, is based on a more detailed analysis in Section 3.3.3.3 in Appendix K.2 of the DEIR (as footnoted on page 4.8-13). The analysis in Appendix K.2 provides a more detailed comparison of water levels in the mine compared to rainfall amounts. Appendix K.2 also includes discussions of the water levels in the private domestic wells in the mine vicinity, in Section 3.2.2.1. As noted in that discussion, not only are the seasonal responses in the wells different than that in the existing mine workings, but the groundwater levels in the wells are also approximately 50 feet to over 400 feet shallower than the groundwater level in the mine. These data provide substantial evidence of a lack of any direct hydraulic connection between the wells and the mine workings. The modeling work conducted in Appendix K.2 and Appendix K.3 further support this conclusion. The DEIR concluded that there is a potential impact to groundwater wells due to dewatering and provided mitigation including a groundwater monitoring plan and the construction of a potable water line for 30 parcels, as well as a requirement that the mine operator replace water supply for any other impacted wells. This analysis was peer-reviewed by the County's groundwater experts, who concurred with the analysis that the impact would be less than significant after mitigation.

Response to Comment Grp 25-36

The commenter asserts that the DEIR's groundwater analysis did not consider future conditions; however, this statement is incorrect. The EMKO (Appendix K.2) and Itasca (Appendix K.3) models are calibrated using existing conditions, as is standard practice in groundwater modeling. The calibrated models are then used to predict future conditions due to the expanded and dewatered underground workings. See, for example, Section 4.2.2 of Appendix K.2 and Section 5.2 of Appendix K.3 for discussion of the modeled effects of future mining conditions.

Response to Comment Grp 25-37

The commenter asserts that the DEIR did not account for climate change scenarios with respect to water supply impacts. Please see Response to Comment Grp 25-27 above relating to climate change scenarios. The specific discussion in the DEIR cited in footnote 44 is describing the groundwater model developed by Itasca and presented in Appendix K.3 of the DEIR. It is appropriate for the groundwater model to use long term averages based on historic rainfall data because part of the model development is to calibrate the model output to past observations. Furthermore, while there are publications that indicate that precipitation patterns are evolving as the climate evolves, there is no technical basis upon which to predict exact changes or to quantify the specific change in the long-term averages over time. Such an effort would be speculative, which is not considered substantial evidence under CEQA. In addition, the rainfall data used throughout the analysis in the DEIR and the supporting appendices is shown on Figure 3-4 of Appendix K.2 of the DEIR. As shown on that figure and discussed in the related narrative, rainfall patterns in the project area are already subject to lengthening periods of drought and an increase in high-intensity rainfall events. During the period considered (1967 through 2018), the annual rainfall varied from a minimum of 18.48 inches to a maximum of 95.93 inches. Figure 3-4 also shows that over this period, there has been a reduction in the number of years of sequential above-average rainfall and an increase in the number of below-average rainfall years. Thus, the

potential influences suggested in this comment are already reflected in the data used for the analysis.

Response to Comment Grp 25-38

The commenter generally summarizes information presented in the DEIR. Please see Responses to Comments Grp -39 25to 25-44 below with respect to the commenter's specific questions and statements.

Response to Comment Grp 25-39

The commenter asks how quickly the water will be treated and how the operational decisions are made with regard to pumping speed. Appendix K.4 of the DEIR describes the design and operation of the water treatment system. The treatment plant would be sized to treat the maximum pumping rate from the mine of 2,500 gpm (3,600,000 gallons per day). The initial dewatering of the mine requires the pumping of the water volume currently in the flooded mine, as well as groundwater inflow into the mine. If this maximum pumping rate is not achieved during initial dewatering due to operational concerns, the duration of time to complete initial dewatering would be extended. The pumping rates during initial dewatering would be determined by company management and supervisors in accordance with relevant permit requirements and operational concerns. The discharge from the mine into South Fork Wolf Creek will be governed by the Central Valley Regional Water Quality Control Board, who will have enforcement authority over discharges from the mine. Please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 32 - Temperature of Mine Water Discharge.

Response to Comment Grp 25-40

The commenter asks how rainfall is considered related to water treatment pond capacity, and questions whether the pond has sufficient capacity to handle storm events. The site drainage plan for the Brunswick site routes the majority of precipitation run-off from the site to the proposed storm water detention basin, not the water treatment pond, as shown in Drawing H-4 of Appendix K.5. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation runoff would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from an extreme storm event. An emergency overflow spillway prevents water from overflowing the water treatment pond berm and mitigates the risk of catastrophic overflow or failure of the pond walls caused by rapid erosion. (See DEIR pp. 4.8-73 to 4.8-74.) The spillway would be reconstructed during the replacement of the southwestern pond dam.

Response to Comment Grp 25-41

The commenter questions whether the freeboard provided in the water treatment pond is sufficient to handle storm events. As discussed in Appendix K.5, design storm depths for these events were attained from information published on the National Oceanic and Atmospheric Administration (NOAA) "Hydrometeorological Design Studies Center, Precipitation Frequency Data Server" website for the specific location of the Brunswick Site (Station Nevada City (04-6136). The PDS-based precipitation frequency estimate for a 100-year storm over durations from 24 hours to 7 days and the daily precipitation inflowing into the water treatment pond (6.4-acre catchment area) is shown in the table below. The water treatment plant has a designed capacity of 2,500 gpm which is equivalent to 11-acre feet per day and is more than sufficient to manage the estimated precipitation over multiple days during a 100-year storm event.

Duration	Total Precipitation inches	Precipitation to water treatment pond (acre feet) Total	Daily
24 hours	10.7	5.7	5.7
2 days	14.9	7.9	2.2
3 days	18.2	9.7	1.8
4 days	20.4	10.9	1.2
7 days	25.2	13.4	0.9

https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=ca

Response to Comment Grp 25-42

The commenter asserts that the DEIR does not analyze settling of solids, nor fill rate of the water treatment pond. However, the commenter is incorrect, as these issues are addressed in the DEIR. The settling of solids, impact to volume, and cleaning of the water treatment pond is discussed in detail in Section 5.4 of Appendix K.4 to the DEIR.

Response to Comment Grp 25-43

The commenter questions how the processing rates can be adjusted if necessary due to precipitation or changing conditions, and what protocols will be in place to adjust pumping and evacuate the mine tunnels. The water treatment plant is designed for a maximum treatment rate of 2,500 gallons per minute and all equipment would be in place to increase treatment to this capacity at any time it was necessary. Pumps in the underground mine would pump water to the water treatment pond and can be turned on and off as necessary by mine employees. Supervisors on surface can communicate with underground and surface workers though radio communications to provide necessary instructions. The water treatment pond provides water storage capacity so that the mine pumping and water treatment are not required to be identical but would average the same rates over a day or several days. As discussed in section 4.5 of Appendix K.2, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. This capacity allows time for any necessary maintenance or repairs to the water treatment plant without curtailment of underground dewatering. As discussed in Section 5.4 of Appendix K.4, the removal of sludge from the water treatment pond can be achieved with slurry pumps. Therefore, the periodic removal of settled solids would not require the curtailment of mine dewatering. In addition, the underground mine has a substantial capacity if it were ever necessary to curtail water pumping for an extended period of time. An estimate of the volume of existing mine workings is provided in Section 3.3.3.2 of Appendix K.2 with the lower levels (2300 – 3280 level) having a volume of 84-acre ft and the entire mine having a total volume of 1,183 acre-ft. At an average inflow rate of 850 gpm (3.75-acre ft per day) it would take approximately 22 days for the lower levels of the mine to flood and approximately 314 days for the entre mine to flood.

Response to Comment Grp 25-44

The commenter asserts that due to the issues it raised in comments Grp 25-39 to 25-44, the DEIR does not provide substantial evidence that the DEIR's conclusions are correct. Please see Responses to Comments Grp 25-39 to 25-44. The DEIR provides substantial evidence to support the conclusions of the environmental analysis in the DEIR.

Response to Comment Grp 25-45

The commenter asserts that the water supply assessment and groundwater analysis in the DEIR are flawed and based on inaccurate assumptions because they ignore the link between groundwater and surface water. However, the groundwater model and hydrologic analysis discuss in detail the linkage between surface water and groundwater, which is fundamental to the analysis. As shown in Figure 4-5 of Appendix K.3, the regional groundwater flows westerly past the project site. Some groundwater enters the mine workings, is pumped to surface, treated and discharged into South Fork Wolf Creek where it flows to Wolf Creek and then to the Bear River. The project produces treated water that is discharged to South Fork Wolf Creek (rather than flowing underground) and does not change the overall water balance. The DEIR's analysis was reviewed by the County's independent groundwater experts, who concurred with the DEIR's analysis and conclusions.

Response to Comment Grp 25-46

The commenter asserts that the DEIR's groundwater analysis is flawed because it predicts less wells to be impacted than previous assessments. However, previous assessments have come to similar conclusions as the current analysis despite the use of simplistic analytic solutions. Please see Master Response 13 – Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 25-47

The commenter questions whether there would be sufficient water to supply 300+ wells if the mine caused a larger drawdown than expected. The DEIR's analysis concluded that only 7 wells would be impacted and conservatively provided mitigation to supply potable water to 30 parcels, despite the fact that less wells are expected to be impacted. This analysis was reviewed by the County's independent groundwater experts, who concurred with the DEIR's analysis and conclusions. There is no evidence that 300+ wells would be impacted, and this impact is speculative. The County is not required to analyze speculative impacts under CEQA. (CEQA Guidelines Section 15384.)

The analysis provided in Chapter 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. Pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. No significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, Beaver or other areas. The predictions include the use of a 100% safety factor, multiple sensitively scenarios, and have been peer reviewed by the county's independent expert consultant. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(b) requires that if, based on the GMP, it is determined that mining operations are resulting in a significant impact to groundwater wells, the Project Applicant shall be responsible for providing a comparable supply

of water to such homes or businesses whose wells are significantly impacted. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

The assumption that impacts to water wells outside of the East Bennett area would occur, and which would require mitigation is speculative and the mitigation that would be performed for this scenario is not known. Therefore, it is not appropriate to include in the Water Supply Assessment.

Response to Comment Grp 25-48

The proposed extension to the NID potable water system would be part of NID infrastructure and therefore would be owned and maintained by NID. Certain properties along E. Bennett Road that are not currently NID customers will be compensated for the use of up to 400 gallons per day of water. The compensation would be at the NID rate at the time of use. There is one vacant property in the East Bennet area. This property would be provided a NID water meter and the capacity charge would be paid by the applicant. If a home is built at this location in the future, the owner would be responsible for water use charges. Please see the revised Well Mitigation Plan, attached as Appendix D to the Final EIR.

Response to Comment Grp 25-49

The commenter summarizes its prior comments and generally asserts that the analysis in the DEIR is inadequate. Please see Responses to Comments Grp 25-1 to Grp 25-48 for responses to the commenter's specific assertions and questions.

Group Letter 26

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March 30, 2022

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Via Email: Idaho.MMEIR@co.nevada.ca.us

The Sierra Fund Comments on the Idaho-Maryland Mine Project Draft Environmental Impact Report SCH No. 2020070378

Dear Nevada County Planning Commissioners and Staff,

The Sierra Fund (Fund) appreciates the opportunity to offer comments on the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project (Project). We first summarize our concerns and recommended actions briefly, and then offer extensive comments about each item in the body of the letter.

Summary and Recommended Action

Grp 26-1

Our review has found that the scientific and site assessment work conducted as part of the DEIR is deeply flawed, providing a totally inadequate base on which the environmental review and mitigation measures were based. The DEIR fails to describe basic aspects of the project including how the existing hazards on the site will be remediated. The DEIR lacks crucial information needed in order to adequately define the potential geochemistry impacts of the 80-year operation, much less the impacts on surface and groundwater quantity in the area. The DEIR is inadequate to serve its proper role in permitting.

We believe that addressing these concerns calls for a significant re-write of the DEIR, which should then be re-circulated for public comment prior to certifying the final EIR.

Our Qualifications

Grp 26-2

The Sierra Fund is a 501(c)(3) non-profit corporation dedicated to improving the environmental health of the Sierra Nevada and the health of those people who make the Sierra their home. The Fund worked closely with Governor Brown and the legislature on the substantial revisions to the Surface Mining and Reclamation Act that became law in 2017. The Fund has led the development of research and projects on abandoned mine lands throughout the region and has published numerous reports of best available methods and technologies for assessing and remediating these compromised lands. We are working collaboratively with a number of local, state and federal agencies to support abandoned mine land reclamation.

Our program is led by Dr. Carrie Monohan who holds a Ph.D. in Hydrology from the University of Washington and is also an adjunct professor at the California State University in Chico. The Fund is advised by hydrologists, geologists, mining engineers, lawyers, medical doctors, geochemists and environmental health specialists.

Scope of Our Comments

The Sierra Fund has signed on to the group community comment letter that raises issues from transportation to green-house gas impacts. In this letter we will not comment on every issue that might be appropriate to raise in a review of this DEIR, such as land use issues raised by the Project proposal to place a major working mine in the middle of a city that depends to a great extent on tourism for its revenue base. However, we echo the comment by our colleague David Chambers with the Center for Public Participation "This mine development proposal lacks the economic and environmental data necessary to evaluate a full mine development proposal. "

Grp 26-3

This letter focuses on two topics in which we are deeply qualified to comment: hydrology and water quality. Our comments mostly follow the same order in which the various issues are reviewed in the DEIR. The Fund makes its comments based on the California Environmental Quality Act (CEQA) and the regulations (Guidelines) adopted to implement CEQA. Court decisions interpreting CEQA and the Guidelines are not referenced in the interest of not detracting from the factual points the Fund wishes to present. However, we believe each of our major contentions concerning the DEIR is grounded in the requirements of CEQA and the Guidelines and supported by court decisions interpreting them.

Overall Comment #1:
Site Assessment Methods Used & Proposed Monitoring Need Improvement

One deep flaw running through this DEIR is an assumption first articulated in the public notice, which states flatly that the project sites are not on a list of hazardous materials complied pursuant to Government Code Section 65962.5. This finding and phrase seems to allow the entire DEIR to ignore the obvious presence of legacy hazardous mining waste on and around the proposed development sites. We believe this is because the current site assessment methods are inadequate to properly evaluate the properties slated for mining.

We do not believe that the assessment methods used to assess the area have found the problems on the site. We do not believe that proper assessment has been done of the ore that will become waste rock; the water that will leach from the site during rain events; or the amount of particles such as asbestos fibers, that will be released as a result of the massive amount of rock and water that are being moved around.

Grp 26-4

The Idaho-Maryland mine drilling cores is not sufficient to provide the necessary information on the geochemistry of the waste rock and tailings and there is no surface water-quality modeling. These are elements that are critical in evaluating the potential impacts of a proposed mine. As a result, it is not known whether the mine waste could leach contaminants into ground and/or surface waters. Rise Gold lack of an adequate number of drill samples results in the lack of data required to adequately characterize the geochemistry of the waste rock and tailings that will be produced, or to supply test data on the leachate from this waste that would allow modeling of potential impacts to surface water.

Rise completed 19 drill exploration drill core holes, totaling 67,500 linear feet, from 2017-2019.

From this drill core, Benchmark Resources collected six drill core samples that it used to characterize the geochemistry of the waste rock. These samples are listed in Table 4-6. The geochemical predictions for approximately 96% of the waste rock to be produced comes from one 10-foot interval of drill core (Sample MA-2 from 3959.7 ' to 3969.7'), and one 1-foot sample (MA-3 from 3265' to 3266').

Another way to describe this is that the geochemical characterization of the 2 million tons of waste rock produced during the first 11-years of mining, and nominally the waste rock production from the entire 80- life of the proposed permit, is represented by these two samples, which come from a total of 11 feet of drill core.

If this site is to be mined for 80 years the environmental monitoring needs to be improved now – and needs to create mechanisms to incorporate additional methods of assessment as they are developed.

THE DEIR needs to be halted until the methods used to assess this site are improved and implemented. Water sampling must be done during storm events and EPA certified laboratories able to do trace metal detection must be used. Soil testing must use judgmental and targeted sampling of areas with mine features identified by the cultural site evaluation that details the site history and uses.

Overall Comment #2: The Centennial disposal site is part of the mining project, and must be addressed as such in this DEIR.

Grp 26-5

The DEIR goes to great lengths to put distance between the ongoing voluntary clean-up at the Centennial Industrial Site and the proposed mine at the Brunswick Industrial site. It argues that the conditions of the Centennial Industrial site now should not be considered as the project baseline, instead they will be "adjusting the environmental baseline for Centennial Industrial Site to use the above-described post-remediation condition instead of existing conditions at the Centennial Industrial Site" (DEIR Page 1-4).

CEQA is clear that a project must be considered as a whole. Projects are not allowed to be piece meal when doing a DEIR. The fact that the DEIR notes that if the Centennial Industrial site can't be used to accept all of the waste generated by the mine that they will just find another undescribed site to place the material, makes it clear that the projects are joined – or are not joined? There is enough capacity or there isn't? This is not planning. This is guessing.

This decision is a judgement call that is really up to the Nevada County Planning Commission to decide. The Commission needs to decide that these projects are related and bring them back as one unified project

Detailed Comments

Grp 26-6

CHAPTER 4.6: GEOLOGY, SOILS, AND MINERAL RESOURCES

Collapses

The DEIR states (pdf p. 542) that "the underground mine workings focused on removal of quartz vein materials that are generally narrow, so the collapse of a deep (e.g., 100 feet bgs) mine feature is not likely to be expressed at the ground surface." However, as described in the DEIR on pdf pages 574-576, there are several existing collapses at this mine site. The scientific basis for the 100-foot cut-off is not presented. The DEIR states of ECM that "They believe that in all areas where the separation equals or exceeds 100 feet there is no chance that ground water drawdown could affect surface structures." Belief is not an adequate technical basis for such a crucial determination.

Due to previous surface instability in the community from underground mine stope collapses, *the DEIR should be revised to provide a robust scientific basis to support the relevant contentions/beliefs, or be more forthcoming about the possibility of collapses originating from more than 100 feet bgs.*

CHAPTER 4.7: HAZARDS AND HAZARDOUS MATERIALS
Assaying

Grp 26-7

A significant omission in the DEIR is the topic of the environmental impacts of a mining operation's mineral assays, which may have environmental impacts due to emitted lead fumes and disposal of lead-contaminated crucibles and cupels. As noted in the DEIR on pdf page 199 (Table 3-8) and pdf page 733 (Table 4.9-6), the mining operations workforce is proposed to include the task of assaying. Assaying is ongoing as mining progresses through variations in the host rock and its ore grade, in order to determine where or whether in the ore body to continue mining. As described in the currently-posted Investopedia article[1] on mineral assessment, "The fire assay method is the most popular method and consists of grinding samples into a fine powder, mixing the sample with lead oxide and appropriate flux. Subsequently, the sample is heated in a ceramic or metal crucible, which decomposes the sample into a lead button containing gold, silver, etc., and slag. The lead button is placed into a shallow cup (cupel) and *the lead is boiled off in a fire assay furnace [emphasis added].* A bead of precious metals is left in the cupel after the lead is boiled off. The bead is weighed and analyzed for precious metals and these data are used to determine ore grade (richness)." A metallurgy website[2] goes on to describe the disposition of the lead contaminated "cupels" left over after the instrumental analysis, as follows, "The disposable *[sic]* of the used, lead-contaminated cupels should done by certified environmental company with accordance of the environmental laws set out by the regulations of the governing body." In California, these lead-contaminated wastes may be determined to be hazardous and therefore pose an additional environmental impact not analyzed in the DEIR.

[1] https://www.investopedia.com/terms/a/assay.asp, accessed on February 4, 2020
[2] https://www.911metallurgist.com/blog/fire-assay , accessed on February 4, 2020

According to the DEIR, assaying will be done five days a week (pdf page 199, Table 3-8) but the DEIR does not describe how many used, lead-contaminated crucibles and cupels Rise plans to dispose of per day and how will be they be handled in an environmentally safe manner. In addition, the DEIR does not address the potential release of lead fumes on a daily basis from the fire assaying process, as described above.

The DEIR should be revised to address the potential daily and long-term release of hazardous wastes both from crucible and cupel disposal as well as potentially from lead fumes.

CHAPTER 4.8: HYDROLOGY AND WATER QUALITY

The threat to water quality posed by the mine waste to be discharged to land will be regulated by the Central Valley Regional Water Quality Control Board under the Land Disposal Program. The DEIR (pdf page 652) correctly states that Water Board regulations governing discharge of mining waste to land are located in Title 27 of the California Code of Regulations, Section 22470 et seq. The DEIR (pdf page 652) also correctly states that "The project will discharge mining waste, which is appropriately regulated under the Title 27 Mining Waste Management Regulations." Mining wastes are defined and classified as follows in Title 27:

Grp 26-8

Mining Waste Management Regulations, apply to all discharges of mining wastes and to owners/operators of a waste management unit for the treatment, storage, or disposal of mining waste. The Mining Waste Management Regulations define "mining waste" as "waste from the mining and processing of ores and mineral commodities. Mining waste includes: (1) overburden; (2) natural geologic material which have been removed or relocated but have not been processed (waste rock); and (3) the solid residues, sludges, and liquids from the processing of ores and mineral commodities" (CCR, Title 27, § 22480(a)).

- Group A: mining waste of Group A are wastes that must be managed as hazardous waste pursuant to Chapter 11 of Division 4.5, of Title 22 of the CCR, provided the RWQCB[3] finds that such mining wastes pose a significant threat to water quality.

- Group B: mining waste of Group B are either: (A) mining wastes that consist of or contain hazardous wastes, that qualify for a variance under Chapter 11 of Division 4.5, of Title 22 of the CCR, provided that the RWQCB finds that such mining wastes pose a low risk to water quality; or (B) mining wastes that consist of or contain nonhazardous soluble pollutants of concentrations which exceed water quality objectives for, or could cause, degradation of waters of the state.

- Group C: mining wastes from Group C are wastes from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity.

[3] RWQCB is defined as the Regional Water Quality Control Board. In the case of the IMM, this would be the Central Valley Regional Water Quality Control Board.

The DEIR does not contain any data that would serve as a basis for classifying waste rock. Waste rock from mines has the potential to generate poor quality effluent that threatens water quality unless adequate containment is provided. As a result, waste rock's potential to produce poor quality effluent should be thoroughly characterized using appropriate tests to the satisfaction of the Water Board (e.g., ASTM D 5744) over a sufficient period, also to the satisfaction of the Water Board (e.g., 40 weeks). Moreover, if the mine began operating, testing would need to continue because the mineral makeup of the waste is likely to be heterogeneous. The same can be said for the mill tailings that are proposed to be either incorporated into cement paste backfill or discharged along with waste rock into the two proposed waste rock piles.

A previous submittal by Rise did include some acid base accounting test data (Desktop Study of Cemented Past Backfill, Itasca Inc. Feb. 24, 2020), from a 47-kilogram (103 pound) composite sample of "ore". Based on the data from the single test, Rise concludes that the tailings will not generate acid. Rise's conclusion, however, fails to recognize that acid base accounting does not provide any data regarding effluent quality data are used to classify mining waste under Title 27 discharge of waste to land regulations. The mill tailings should be thoroughly characterized using appropriate tests (e.g., ASTM D 5744).

Grp 26-9

According to the DEIR, the proposed mine will produce 350,000 tons of ore per year, meaning a very large total of 28 million tons if the mine operates for the planned 80 years. Itasca's desktop study does recommend follow up sampling and analyses during mining to catch changes in ore mineralogy that might affect effluent quality.

The DEIR should be revised to clarify that follow-up ore sampling and analyses can be expected to continue indefinitely during mining. Furthermore, if the analyses indicate that the nature of expected effluent quality has changed for the worse, further actions may be required by the Water Board in the future to protect water quality.

Grp 26-10

Terminology

The term "Engineered Fill" introduced in the DEIR on pdf page 32 is undefined and is used throughout the DEIR. Mined rock that does not have enough gold to warrant processing is more correctly referred to as waste rock. Such rock may be useful in constructing an engineered fill provided that it has been classified as a waste that does not pose a threat to water quality by the appropriate Regional Water Board that has authority over the location of discharge. The DEIR (pdf page 653) acknowledges that "the engineered fill...is a mining waste."

Therefore, for clarity and conformance with regulations, the DEIR should discontinue use of the misleading term "Engineered Fill" and globally replace it with "waste rock".

The term "Barren Rock" is introduced on pdf page 181 but does not fall under the definition of mining waste in CCR, Title 27, § 22480(a). For clarity and conformance with regulations, "Barren Rock" should be globally replaced with "waste rock."

Grp 26-11

The DEIR indicates on pdf page 33 that Rise plans to sell waste rock on the open market if it is still being produced after the two proposed waste rock piles reach capacity. This is an unrealistic proposal unless the appropriate Regional Water Board (with jurisdiction over the location where the waste rock is to be discharged to land) determines that the waste rock does not pose a threat to water quality. It should be noted that dispersing waste rock and other mine waste over large areas without containment often results in contamination (e.g., Calcine mercury mine tailings used for road construction in San Luis Obispo County).

The DEIR must specify where the waste rock will go after the waste rock piles reach capacity, or if the Centennial site cannot be used to accept all of the rock generated by the project.

Grp 26-12

Waste Characterization

The DEIR, on pdf page 33 as well as later in the document, describes DTSC's characterization work at the Centennial site (the discharge site of historic Idaho Maryland Mine waste). The Centennial site cleanup potentially provides insight into how the waste rock and tailings from the proposed mine might behave under surface conditions over the long term. According to the description in the DEIR (pdf page 534), it appears that the historic mining wastes from this very mine have been undergoing a form of long term (over 60 years), uncontrolled Kinetic test. The DEIR states (pdf page 534), "Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations." The information suggests that there is a serious risk that the proposed new waste rock piles would produce effluent that would pose a significant risk to water quality unless the Water Board requires adequate containment.

The DEIR should acknowledge that data from DTSC's characterization work at the Centennial site undercuts the notion that mining waste from a new operation would not pose an environmental threat.

Grp 26-13

Waste Rock Piles

The two proposed waste rock piles (30 acres at the Brunswick site, 44 acres at the Centennial) border Wolf Creek and its South Fork. There should be a real concern that effluent from these waste rock piles could severely degrade not only the South Fork of Wolf Creek and Wolf Creek, but groundwater as well, if the waste rock piles are permitted under Title 27 as unlined and uncapped mine waste management units.

The DEIR should characterize the risk of effluent from these waste rock piles getting into surface and groundwater and design an appropriate mitigation measure.

Grp 26-14

Financial Assurances

The DEIR fails to mention that regulations require that the discharger (mine operator) provide, in advance, financial assurances to cover closure and post-closure mining activities to the satisfaction of the Regional Water Board. The applicable regulations [27CCR 22510(h)] state that the post-closure period ends only when the Regional Water Board "determines that water

quality aspects of reclamation are complete and waste no longer poses a threat to water quality." Robust and ongoing financial assurances are vital to preventing long-term environmental effects from the waste piles, since they will presumably remain in place indefinitely into the future.

The Reclamation Plan and associated DEIR must describe potential mitigation measures – including those that might be needed to treat water discharge – in one project. Water quality treatment can be expensive and have its own potential environmental impacts. These issues should be included in the DEIR and considered in the Financial Cost Estimate and Financial Assurance Mechanisms created when the project is approved.

Cement Paste Backfill

Grp 26-15

Cement Paste Backfill (CPB) is made from mill tailings, cement, and water and is used to fill underground workings. Aggregate (e.g., crushed waste rock) is added when unstable underground workings need support. Rise has proposed to backfill portions of the mine with CPB. Backfilling with CPB may present problems under the Title 27 regulations because tailings (mine waste) would be deposited underground and would likely be submerged by groundwater after mining (and thus pumping) ceases, and the water in the mine ("mine pool") returns to its pre-mining elevation. It is unclear how the Water Board 's requirements would address this scenario in order to protect water quality into the future.

The DEIR must be amended to address these long term water quality impacts and potential mitigation measures.

Permitting Period

Grp 26-16

The DEIR repeatedly refers to a proposed permit period of 80 years. For example, the DEIR states on pdf page 32 that "The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period..." This time period characterization is incorrect for water quality permitting. The proposal would entail obtaining several different types of Water Board permits, none of which would have anything approaching an 80-year time frame. The waste discharge requirements issued for waste rock piles and other discharges of mining waste to land all must be reviewed periodically and made available for public comment during each review; they are subject to changes in specific requirements. In addition, NPDES permits for discharges to surface water expire, unless renewed, every five years per the federal Clean Water Act. The NPDES permit re-issuance process is also subject to public comment.

The DEIR should be revised so that it does not misleadingly imply that there is an 80-year permit period for any water quality permits.

Summary

Grp 26-17

What the DEIR describes is a proposed mining operation that if initiated, would be quite similar to historical mining operations in Grass Valley, only larger. The DEIR does not propose any significant innovative techniques to improve management of mine wastes or process ore. The

DEIR indicates that the mine would rely on surface disposal of waste rock and tailings, just as the historical mines in Grass Valley once did.

Nevada County has more than its share of legacy waste rock and tailings sites, mine water discharges, and mine collapses left over from historical mining operations. Today's Grass Valley residents have to live with and sometimes pay for cleaning up mine wastes from historical mines.

The DEIR claims that the two waste rock piles produced as part of the mining process will be suitable for development, however that claim is pure speculation at this time. No data are presented to support that claim, but plenty of data are available about the water quality and air quality impacts of legacy gold mines working in the same ore body.

Grp 26-18

What isn't pure speculation is that the two waste rock piles that would result from operating the mine would be eyesores at best and more likely, attractive nuisances and environmental liabilities that current and future residents of Nevada County would have to live with in perpetuity. As stated in the DEIR (pdf page 1052), the No Project Alternative is environmentally superior.

Please feel free to contact me if you have any questions about our comments. Thank you again for this opportunity to participate in this public process.

For the Sierra,



Carrie Monohan, Ph.D.
Program Director
The Sierra Fund

Adjunct Professor
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GROUP LETTER 26: CARRIE MONOHAN, THE SIERRA FUND

Response to Comment Grp 26-1
This comment is introductory in nature. The commenter asserts that the DEIR is inadequate and should be revised and recirculated. The commenter's specific comments are addressed in the following responses to comments below.

Response to Comment Grp 26-2
This comment details the commenter's background. Comment noted.

Response to Comment Grp 26-3
This comment is introductory in nature and expresses general concerns regarding the project. Please see Master Response 1.

Response to Comment Grp 26-4
The commenter asserts that the DEIR ignores the history of hazardous mine waste at the project site, and that the site assessment methods used to characterize the rock at the project site for waste rock leachates and asbestos are inadequate. The commenter also asserts that the samples taken from drilling cores are inadequate to provide information on the geochemistry of the rock and that there is no surface water quality modelling provided. Please see Master Response 8 - Mine Waste Characterization, Master Response 9 - Historic Mine Waste at Centennial Site, and Master Response 10 - Explosives, Reagents, and Brunswick Fill. Please also see Responses to Comments Grp 7-158 and 7-162. The proposed project would likely produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity (See Master Response 9 - Historical Mine Waste at Centennial Site). Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project. Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)).

Response to Comment Grp 26-5
The commenter asserts that the Centennial cleanup project should be analyzed as part of the DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA. Please also see Section 1.3 of the DEIR regarding the adjusted baseline used for the Centennial Site.

Response to Comment Grp 26-6
The commenter asserts that the DEIR does not include sufficient analysis for its statement that collapse of deep workings that are 100 feet or more below ground surface would not be expressed on the surface. Please see Master Response 29 – Near Surface Workings.

Response to Comment Grp 26-7
The commenter asserts that environmental impacts from lead used in the assaying process was not properly analyzed in the DEIR. Fume hoods and a scrubber system, capable of removing fine lead dusts, are required to be used for assay labs in order to meet health and safety regulations. Therefore, no significant emissions of lead to the environment from fire assaying would occur.

Dust from the scrubber is collected in sealed containers and disposed of in an appropriate offsite facility. The engineering of the mechanical systems will be completed before submittal of building permits to the County. Cupels from assaying would also by disposed of in an appropriate manner. The mass of these materials is trivial, and the transport of solid waste (205 tons per year) is accounted for in the air quality assessment. Mitigation Measure 4.7-1(d) requires the approval of a Hazardous Materials Business Plan which would incorporate the storage and transport of dust or materials that qualify as hazardous waste.

Response to Comment Grp 26-8

The commenter asserts that insufficient testing was done to characterize mine waste for the project and that further testing should be done. The comment also asserts that the DEIR does not contain any data that would serve as a basis for classifying waste rock. Regarding tests performed on rock from the project site as a basis for waste rock characterization, please see Master Response 8 – Mine Waste Characterization. As requested by the commenter, further testing will be required of the mine waste as a prerequisite to submitting a Report of Waste Discharge and obtaining Waste Discharge Requirements for the project, as required by the DEIR. Section 4.4 of Appendix K.2 of the DEIR provides geochemical testwork conducted on tailings and barren rock samples from the project. Testwork included Acid Based Accounting (ABA), Total Metals, and California Waste Extraction Testing (WET). Per California regulations, the Waste Extraction Test (WET), which was used for the DEIR's analysis, should be used to determine the amount of extractable substance in waste rock (CCR Title 22 Division 4.5, Chapter 11, Article 5, Appendix II).

The DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified mitigation measures to address these potential impacts. Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). Please note that Mitigation Measure 4.8-1(e) has been revised in the Final EIR (cf. Response to Comment Agcy 5-4) in response to the Central Valley Water Board's clarifications on the requirements for ongoing waste characterization in the approved WDR.

Response to Comment Grp 26-9

In accordance with CCR Title 27 Section 21710(a)(4) the CVRQCB must be notified of any material change in the types, quantities, or concentration of mining wastes discharged within a reasonable time before those changes are made effective. Therefore, as exploration and mine planning continue throughout the life of the mining operation, any significant change in mine waste chemistry would be provided to the CVRWQCB and if necessary, incorporated into the WDRs. Additionally, as part of WDRs for mining waste units, the RWQCB will require monitoring of any effluent from the engineered fill piles. Please see Master Response 8 – Mine Waste Characterization, and Response to Comment Agcy 5-4.

Response to Comment Grp 26-10

The commenter asserts that the term "engineered fill" should not be used in the DEIR, and instead use the term waste rock. However, the term "engineered fill" is specifically used to refer to the mix of barren rock and sand tailings that will be combined to create the engineered fill pads on both the Centennial and Brunswick sites. As described in the DEIR, barren rock and sand tailings are to be compacted in lifts to engineering standards in order to provide a useful surface appropriate for construction of potential future buildings on the sites. (See DEIR, p. 3-26; 3-32 through 3-33.) This is contrasted to a more conventional mining operation where tailings may be placed by slurry

in a tailings pond facility and waste rock simply dumped uncompacted into piles. The commenter does not identify any impacts that were not addressed in the DEIR due to the use of this terminology.

Response to Comment Grp 26-11

Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

The commenter states that the DEIR must identify all locations where the construction aggregate produced by the mining operation will go after the engineered fill piles are full. The mine operator cannot accurately estimate every construction project that may purchase construction aggregate from the project, so the commenter's requested analysis would be speculation. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, the requested analysis is not necessary. Regarding the commenter's concern with mercury, the rock samples taken from drilling cores have not been shown to contain elevated mercury. As shown in Table 4.7 of Appendix K.2, mercury ranges from 11.4 to 71.3 nanograms/gram, which is less than the average crustal abundance for mercury of 86 nanogram/gram (see Table 3 of Itasca Desktop Study of Cemented Paste Backfill attached to the Final EIR as Appendix Q).

In addition, as shown in Response to Comment Agcy 5-5, Mitigation Measure 4-8-1(e) has been modified to clarify the requirement that the applicant shall not sell or utilize waste rock and tailings from the project for construction aggregate or fill purposes offsite (i.e., sites other than the applicant's Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR which will establish the specific methods, volumes and frequency of characterization. See revised language of Mitigation Measure 4.8-1(e) in Response to Comment Agcy 5-4.

Response to Comment Grp 26-12

The commenter states that the mine waste present on the Centennial Site is evidence that the waste rock from the project would create an environmental threat. Please see Master Response 9 - Historical Mine Waste at Centennial Site, and Master Response 8 - Mine Waste Characterization. The proposed project is expected to produce mine waste with lower sulfide and metal content than those produced historically due to modern processes, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity (See Master Response 9 - Historical Mine Waste at Centennial Site). Based on testing on samples taken from the project site, and the binding mitigation measures addressing water quality, the DEIR concluded that impacts to water quality would be less than significant after mitigation. The commenter states that the Water Board should require containment of mine waste. As required by Mitigation Measure 4.8-1(e), prior to placement of engineered fill, the mine operator is required to submit a report of waste discharge including additional mine waste characterization testing, and the CVRWQB will require such containment measures as are appropriate under California Code of Regulations, Title 27, for mining waste units. Mining waste containment measures deemed necessary by the CVRWQB would be incorporated into the waste discharge requirements for the project. Please see Response to Comment Grp 26-11 above.

Response to Comment Grp 26-13

The commenter states that water quality impacts could result from placement of engineered fill. This impact was already addressed in Chapter 4.8 of the DEIR, found to be potentially significant, but less than significant after implementation of Mitigation Measure 4.8-1(e). Please see Responses to Comments Grp 26-4, 26-8 and 26-12, and Master Response 8 - Mine Waste Characterization.

Response to Comment Grp 26-14

The commenter asserts that the DEIR needs to discuss bonding requirements and that the reclamation plan needs to address mitigation measures to treat water discharge. Bonding requirements under the Surface Mining and Reclamation Act are discussed on page 2-3 of the DEIR. As the commenter implies, the CVRWQCB will require specific financial assurances for closure and post-closure maintenance of mining waste units as required by Title 27 section 22510. This may include the need for long-term water treatment of mine-related discharges. This issue will be addressed in the approval of the WDR required by Mitigation Measure 4.8-1(d) and 4.8-1(e)). The specifics of that bonding requirement cannot be determined until after a RoWD is submitted to the CVRWQCB, which would occur after approval of the project. The reclamation plan required under SMARA relates to reclamation of surface mining features; as such, the treatment of water relating to underground mining, and any required bonding, is more properly addressed through the waste discharge requirements for the project.

Response to Comment Grp 26-15

The DEIR has already analyzed water quality impacts from use of cement paste backfill and pursuant to Mitigation Measure 4.8-1(e), a report of waste discharge must be submitted to the CVRWQCB and waste discharge requirements must be issued by the CVRWQCB prior to placement of cement paste backfill. Please see Responses to Comments Grp 26-4 and 26-8.

As discussed on page 4.8-47 of the DEIR, use of cemented paste backfill for the project is an environmentally favorable method for tailings disposal because it can significantly reduce potential release of metals from the tailings. As stated on page 4.8-50 of the DEIR, once mining is completed and underground workings are allowed to flood, the same reducing conditions that occur under existing conditions would develop again, preventing oxidation of sulphide minerals.

Response to Comment Grp 26-16

The commenter asserts that the DEIR should be revised to clarify that the water board permits will not have 80-year terms. The DEIR does not state that any water board permit would be issued for an 80-year term, but rather proposes a project with an 80-year term for the conditional use permit. (DEIR, p. 1-3.) Ancillary permits required for the project, such as waste discharge requirements from the CVRWQCB, will have separate permit lengths and may need renewal during the life of the project. This is typical for any long-term industrial project in California. The commenter does not identify any environmental impact that was not analyzed in the DEIR.

Response to Comment Grp 26-17

This comment is a summary of the previous comments. Please see Responses to Comments 26-1 through 26-16. Unlike historical mining, the proposed Idaho-Maryland Mine Project would not produce large quantities of mineralized waste rock and would remove most sulfide minerals from the sand tailings before the sand tailings are placed as engineered fill. Given that the proposed future mine waste will by nature and by process design be less mineralized than the historical mine waste, the future mine waste will likely also be classified as Group C waste. Regardless of the future waste classification, the future placement of mine waste as engineered fill will be subject to regulation under the California Code of Regulations (CCR) Title 27, which sets forth

requirements pertaining to the discharge of mine waste to land and requires the development of Waste Discharge Requirements (WDRs) by the CVRWQCB. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Grp 26-18

The commenter asserts that the engineered fill piles would be eyesores, attractive nuisances, and environmental liabilities, and recommends the No Project Alternative. The commenter does not provide any specific commentary on the adequacy of the DEIR in this comment. Note that the DEIR, Chapter 4.1, concludes that the proposed engineered fill piles would contribute toward the project's significant and unavoidable aesthetic impacts.

Group Letter 27

Matt Kelley, Senior Planner

Nevada County Planning Department

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Nevada City, CA 95959

Matt.Kelley@co.nevada.ca.us



April 4, 2022

Subject: Comments on the Idaho-Maryland Mine project Draft Environmental Impact Report - Well owners in the vicinity of the Idaho-Maryland Mine request adequate safeguards.

Dear Mr. Kelley:

The undersigned members of the Wells Coalition respectfully request adequate safeguards for well owners in a recirculated Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine.

The Wells Coalition is a group of property/well owners in the vicinity of the Idaho-Maryland mine that have formed for the purpose of protecting our only source of water, our wells.

The DEIR Well Mitigation Plan cites "expert opinion" and states being in compliance with The County Policy 17.12 [1], which designates protections for wells from potential mining impacts. However, our review of the report leads us to conclude otherwise.

The Nevada County General Plan 17.12 (complete policy)

Grp 27-1

In approving mining projects which according to expert opinion may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses:

1) The County shall require the operator to guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water.

2) Where water quantity and quality problems occur, an immediate water supply shall be provided by the operator until the source of the problem is determined.

3) The burden of proof shall be on the operator to show that the mining operation did not create the water problem.

4) If it is determined that the operator is at fault, impacted owners shall be compensated by the operator.

The applicants DEIR Well Mitigation Plan states:

"Expert opinion has determined that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project." [2] and " All potentially impacted wells are located in the E. Bennett Road area. Domestic water wells outside this area will not be impacted." [2], [3]

The following statements from the DEIR and additional expert opinion contradict the certainty of the applicant's Well Mitigation Plan statements, citing repeatedly, uncertainties in hydrologic and hydrogeologic predictions and impacts to wells due to groundwater response from dewatering of the Idaho-Maryland Mine:

"In our opinion and based on the data and analysis presented in the Itasca Report and EMKO Report, it is possible that mining activities, including blasting, backfilling with CPB, and sealing of drains or areas of the underground workings, could activate leaching and groundwater flow in new subsurface areas, potentially resulting in impacts to neighboring wells, and discharges to surface water of groundwater with water quality exceeding applicable standards.
These impacts could potentially occur during the mining

or post-mining periods. Because of the uncertainty inherent in the bedrock fracture flow system, monitoring will be needed, as mining activities progress, to assess potential impacts, design appropriate solutions and attain necessary permits to mitigate these potential impacts. These efforts should be addressed in the monitoring and mitigation requirements for the mining and post-mining phases of the Proposed Project." [4]

"The EMKO Report describes a three-step procedure used to assess potential drawdown effects in perimeter areas. A major assumption underlying the procedure is that flow contributions from the workings are distributed uniformly across the mining areas after correcting for depth. However, the subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. Discussion of this uncertainty and the overall uncertainty of the analytical and numerical model predictions with respect to groundwater level impacts on individual wells should be provided. expanded to include an assessment of the uncertainty in the conclusions developed by Todd Engineers."[4]

"Although the analysis is considered conservative in methodology, several complexities in the groundwater system could potentially result in a larger or smaller radius of influence. Although larger impacts seem unlikely, it is difficult to prove that aberrations in the system do not exist." [5]

"Uncertainties in the analysis indicate that monitoring should occur over a slightly larger area than where impacts are predicted. In addition, the monitoring program should consider adjustments specifically for geologic faulting." [5]

"Monitoring locations should also include areas outside of the predicted impact zone to account for uncertainties in the analysis," [5]

"Due to the uncertainties regarding the complex geology, groundwater flow, flow dynamics in the mine, and the presence of faults, dewatering impacts to domestic water supply wells cannot be accurately predicted. However property owners within the

estimated area of influence around the proposed project must be ensured a continuous source of water is available to their property."[6]

"The geologic formation in which the mine is located is fractured bedrock whose hydrogeology is difficult to predict. Therefore, reliance on Domestic Well Level Monitoring Program data will be required to assess impacts and discern appropriate mitigation measures for each domestic well owner." [7]

"Even a well calibrated model has a large uncertainty to it, in its predictions. It turns out that this model is not well calibrated, so the uncertainties are almost certainly larger. It's not well calibrated because it tries to make predictions of what will happen in the shallow aquifer without historic shallow well water levels to calibrate to." [8]

"The fracture systems existing in buried bedrock beneath Grass Valley are not map-able within the resolution needed to predict specific dewatering effects. Technology and state-of-the-art hydrogeology have not developed to a level that fracture mapping is possible. Due to this limitation, hydrogeologic modeling is attempted by making an assumption on fracture connectivity." [9]

"The groundwater in this particular area is contained in and flows through fractures in near surface bedrock and because of this fracture flow regime, the groundwater flow in quantity varies considerably with location and cannot be predicted with certainty. Furthermore, complete hydraulic separation between the deeper groundwater within the underground mine workings and the shallow groundwater within fractures and supplying the domestic wells cannot be assumed." [11]

"Based upon the significance criteria established on page 4.3-4, the risk to all wells within the study area, regardless of risk category, represent a potentially significant impact." [12]

"It is expected that the actual mining areas will change from the modeled mining areas due to vein geometry and discoveries, which will only be known after extensive underground exploration is completed in the future."[13]

"The study area has not been monitored by an approved groundwater monitoring system designed to observe the dynamics associated with subsurface hydrology. Therefore, many of the initial unknown hydrogeologic and geologic parameters located within the earth between well and mine elevations still exist."

"With fractured rock there will always be uncertainty and during my career there won't be any 100% confidence in predictions."[14]

The overwhelming consensus of the experts listed above is that the project "... may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses" per County Policy 17.12 [1], and therefore the applicant is not in compliance with that policy. In light of the uncertainty present in the hydrogeology predictions, the DEIR Well Mitigation Plan is inadequate.

The mitigation plan is inadequate because it does not satisfy the condition of the County Policy, and it has no means of even determining whether those conditions will be met.

The DEIR has not adequately defined an area of potential impacts.

The DEIR acknowledges that more groundwater level data is needed to assess the potential impacts on groundwater levels [15]

The DEIR's analysis of groundwater impacts is so fundamentally deficient that those of us who rely on groundwater wells for our drinking supply do not have the fundamental information necessary to evaluate the Project's effects on our wells. The DEIR's analysis must be comprehensively revised to fully account for the severity and extent, including the geographic magnitude, of the Project's impacts. Until the EIR accurately discloses the Project's groundwater impacts, it is not possible to determine whether the mitigation the DEIR relies on would even be close to sufficient to protect our wells.

The Wells Coalition intends to weigh in again on the EIR's approach to well mitigation once the EIR's groundwater impact analysis is thoroughly revised and recirculated for public review.

Thank you for your time and consideration.

Sincerely,

Collier Road, Grass Valley 95945

GROUP LETTER 27: THE WELLS COALITION

Response to Comment Grp 27-1

This letter is a duplicate copy of Group Letter 28. Please see comments and responses in Group Letter 28.

Group Letter 28

WELLS COALITION

The Wells Coalition
wells@cea-nc.org

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Idaho.MMEIR@co.nevada.ca.us

April 4, 2022

Subject: Comments on the Idaho-Maryland Mine project Draft Environmental Impact Report - Well owners in the vicinity of the Idaho-Maryland Mine request adequate safeguards.

Dear Mr. Kelley:

The undersigned members of the Wells Coalition respectfully request adequate safeguards for well owners in a recirculated Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine.

The Wells Coalition is a group of property/well owners and a few renters in the vicinity of the Idaho-Maryland mine that have formed for the purpose of protecting our only source of water, our wells.

Grp 28-1

The DEIR Well Mitigation Plan cites "expert opinion" and states being in compliance with The County Policy 17.12 [1], which designates protections for wells from potential mining impacts. However, our review of the report leads us to conclude otherwise.

> *The Nevada County General Plan 17.12 (complete policy)*
>
> *In approving mining projects which **according to expert opinion** may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses:*
> *1) The County shall require the operator to guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water.*
> *2) Where water quantity and quality problems occur, an immediate water supply shall be provided by the operator until the source of the problem is determined.*

3) The burden of proof shall be on the operator to show that the mining operation did not create the water problem.
4) If it is determined that the operator is at fault, impacted owners shall be compensated by the operator.

The applicants DEIR *Well Mitigation Plan* states:

"Expert opinion has determined that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project." [2] and *" All potentially impacted wells are located in the E. Bennett Road area. Domestic water wells outside this area will not be impacted."* [2], [3]

The following statements from the DEIR and additional expert opinion contradict the certainty of the applicant's *Well Mitigation Plan* statements, citing repeatedly, uncertainties in hydrologic and hydrogeologic predictions and impacts to wells due to groundwater response from dewatering of the Idaho-Maryland Mine:

Grp 28-2

"In our opinion and based on the data and analysis presented in the Itasca Report and EMKO Report, it is possible that mining activities, including blasting, backfilling with CPB, and sealing of drains or areas of the underground workings, could activate leaching and groundwater flow in new subsurface areas, potentially resulting in impacts to neighboring wells, and discharges to surface water of groundwater with water quality exceeding applicable standards. These impacts could potentially occur during the mining or post-mining periods. Because of the ***uncertainty inherent in the bedrock fracture flow system****, monitoring will be needed, as mining activities progress, to assess potential impacts, design appropriate solutions and attain necessary permits to mitigate these potential impacts. These efforts should be addressed in the monitoring and mitigation requirements for the mining and post-mining phases of the Proposed Project."* [4]

"The EMKO Report describes a three-step procedure used to assess potential drawdown effects in perimeter areas. A major assumption underlying the procedure is that flow contributions from the workings are distributed uniformly across the mining areas after correcting for depth. ***However, the subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. Discussion of this uncertainty and the overall uncertainty of the analytical and numerical model predictions with respect to groundwater level impacts on individual wells should be provided. expanded to include an assessment of the uncertainty in the conclusions developed by Todd Engineers."***[4]

Grp 28-3

"Although the analysis is considered conservative in methodology, ***several complexities in the groundwater system could potentially result in a larger or smaller radius of influence. Although larger impacts seem unlikely, it is difficult to prove that aberrations in the system do not exist."*** [5]

"Uncertainties in the analysis indicate that monitoring should occur over a slightly larger area than where impacts are predicted. In addition, the monitoring program should consider adjustments specifically for geologic faulting." [5]

"Monitoring locations should also include areas outside of the predicted impact zone to account for uncertainties in the analysis," [5]

Grp 28-4

"Due to the uncertainties regarding the complex geology, groundwater flow, flow dynamics in the mine, and the presence of faults, dewatering impacts to domestic water supply wells cannot be accurately predicted. *However property owners within the estimated area of influence around the proposed project must be ensured a continuous source of water is available to their property."*[6]

"The geologic formation in which the mine is located is fractured bedrock whose hydrogeology is difficult to predict. *Therefore, reliance on Domestic Well Level Monitoring Program data will be required to assess impacts and discern appropriate mitigation measures for each domestic well owner."* [7]

Grp 28-5

"Even a well calibrated model has a large uncertainty to it, in its predictions. It turns out that this model is not well calibrated, so the uncertainties are almost certainly larger. *It's not well calibrated because it tries to make predictions of what will happen in the shallow aquifer without historic shallow well water levels to calibrate to."* [8]

"The fracture systems existing in buried bedrock beneath Grass Valley are not map-able within the resolution needed to predict specific dewatering effects. Technology and state-of-the-art hydrogeology have not developed to a level that fracture mapping is possible. Due to this limitation, hydrogeologic modeling is attempted by making an assumption on fracture connectivity." [9]

"The groundwater in this particular area is contained in and flows through fractures in near surface bedrock and because of this fracture flow regime, the groundwater flow in quantity varies considerably with location and ***cannot be predicted with certainty. Furthermore, complete hydraulic separation between the deeper groundwater within the underground mine workings and the shallow groundwater within fractures and supplying the domestic wells cannot be assumed."*** [11]

"Based upon the significance criteria established on page 4.3-4, ***the risk to all wells within the study area, regardless of risk category, represent a potentially significant impact."*** [12]

Grp 28-6

"It is expected that the ***actual mining areas will change from the modeled mining areas*** *due to vein geometry and discoveries, which will only be known after extensive underground exploration is completed in the future."*[13]

Grp 28-7

"The study area has not been monitored by an approved groundwater monitoring system designed to observe the dynamics associated with subsurface hydrology. Therefore, ***many of the initial unknown hydrogeologic and geologic parameters located within the earth between well and mine elevations still exist."***

"With fractured rock there will always be uncertainty and during my career there won't be any 100% confidence in predictions."[14]

The overwhelming consensus of the experts listed above is that the project "... may threaten the existing quality or quantity of surface or subsurface water which supply adjacent homes and businesses" per County Policy 17.12 [1], and therefore the applicant is not in compliance with that policy. In light of the uncertainty present in the hydrogeology predictions, the DEIR Well Mitigation Plan is inadequate.

The mitigation plan is inadequate because it ***does not satisfy the condition of the County Policy, and it has no means of even determining whether those conditions will be met.***

The DEIR has not adequately defined an area of potential impacts.

Grp 28-8

The DEIR acknowledges that more groundwater level data is needed to assess the potential impacts on groundwater levels [15]

The DEIR's analysis of groundwater impacts is so fundamentally deficient that those of us who rely on groundwater wells for our drinking supply do not have the fundamental information necessary to evaluate the Project's effects on our wells. The DEIR's analysis must be comprehensively revised to fully account for the severity and extent, including the geographic magnitude, of the Project's impacts. Until the EIR accurately discloses the Project's groundwater impacts, it is not possible to determine whether the mitigation the DEIR relies on would even be close to sufficient to protect our wells.

The Wells Coalition intends to weigh in again on the EIR's approach to well mitigation once the EIR's groundwater impact analysis is thoroughly revised and recirculated for public review.

Thank you for your time and consideration.

Sincerely,

The Wells Coalition

Our membership represents almost 100 properties and is still growing. A number of our members wanted to have their signatures added to this letter. Their consent was gathered electronically and the names are shown below. Contact details are available by request to the Nevada County Planning Commission only.

Gary Pierazzi
Emerald Court, Grass Valley

Bob and Christy Hubbard
Mink Court, Grass Valley

Tony Lauria
Greenhorn Rd., Grass Valley

Greg and Robin Van Ess
Anchor Lane, Grass Valley

Matt and Laino Levy
Anchor Lane, Grass Valley

Robin Milam, Tom Milam
Axle Ct, Grass Valley

Jill Shoemaker and Stuart Beach
Barker Lane, Grass Valley

Judy Swartzendruber
Beaver Dr. Grass Valley

Tod and Donna Bowman
Beaver Dr., Grass Valley

James R. Hall
Beaver Drive, Grass Valley

Eric Gibbons, Diane Gibbons
Beaver Drive, Grass Valley

Jennifer Durrett, Dale Durrett
Beaver Drive, Grass Valley

Aaron and Kari Bailey
Beaver Drive, Grass Valley

Kathy Foley, Susan Steen, Julie Jenssen
Beaver Drive, Grass Valley

Gary Bowman and Amy Bowman
Bennett Road, Grass Valley

Daniel & Linda Ketcham
Brunswick Pines Road, Grass Valley

Sandra Hewston
Casa Loma Dr., Grass Valley

Linda Lanzoni
Christopher Robin Way, Grass Valley

Lanny Netz
Collier Rd., Grass Valley

Douglas Cornish
Cordell Ct., Grass Valley

Jim and Renate Otto
Diamond Court, Grass Valley

Laura and Don Gagliasso
Diamond Ct., Grass Valley

Kim Davison, Bonnie Jones, Tyler Jones
E. Bennett Rd., Grass Valley

Dennis & Linda Voss
E. Bennett Road, Grass Valley

Robert and Victoria Jewel
East Bennett Road, Grass Valley

George and Cynthia Geros
Elk Lane, Grass Valley

Linda Cosick
Foster Rd., Grass Valley

Laura Solano
Glenn Pines Rd, Grass Valley

Howard, Cynthia, & Florence Kuhlmann, Corinne Beall
Greenhorn Dr., Grass Valley

Robert Lewis
Greenhorn Rd, Grass Valley

Erin Thomas-Rose, Stanley Thomas-Rose
Greenhorn Rd, Grass Valley

Sandra Young
Greenhorn Road, Grass Valley

Mondae Holt and Chris House
Greenhorn Rd, Grass Valley

Mary Ann Coleman
Greenhorn Road, Grass Valley

Lauren Lewis
Greenhorn Road, Grass Valley

Caela Wynd
Howald Lane, Grass Valley

Gwen Moore
Hubbard Rd., Grass Valley

Karyn Gladstone
Jones Ridge Rd, Grass Valley

Patricia Bennett
Lava Rock Ave., Grass Valley

John Cosenza - Owner
Leaf Lane, Grass Valley (two properties)

Peter Fromm
Liquidambar Lane, Grass Valley

Louise and Carter Taylor
Loma Rica Dr., Grass Valley

Jennifer Burt
Loma Rica Drive, Grass Valley

Janet Steinmann, Jim Steinmann
Loma Rica Drive, Grass Valley

David Wills
Lower Anchor Lane, Grass Valley

John Vaughan, Gail Johnson Vaughan
Lower Colfax Road, Grass Valley

Elise Stupi, Ken Stupi
Madrona Leaf Court, Grass Valley

Larry Rieger, Patsy Rieger
Madrona Leaf Ct., Grass Valley

Michael, Carla, Tiffani, & Feather Fanucchi
Madrona Leaf Ct., Grass Valley

Edson & Lynell Holmes
Mink Court, Grass Valley

Lauren and Mary Anderson
Mink Court, Grass Valley

Hugh Shelbourn, Maggi Shelbourn
N. Meadow View Drive, Grass Valley

Nicolette and Alex Renoir
Old Mine Rd., Grass Valley

Dorothy Goodnow
Old Mine Rd., Grass Valley

Richard Melim, Dolly Melim
Old Mine Road, Grass Valley

Penelope Curtis
Tiger Lily Lane, Grass Valley

Bob and Barbara White
Wood Rose Way, Grass Valley

Richard Blair
Wood Rose Way, Grass Valley

Sal Giacinto
Wood Rose Way, Grass Valley

Azriel LaMarca, Michael LaMarca
Icon Way, Nevada City

Louisa Suto
N. Bloomfield Rd, Nevada City

Sara Bottrell
Side Hill Circle, Nevada City

*** footnotes***

[1] The Nevada County General Plan 17.12 (complete policy).
[2] Appendix K.9 Idaho Maryland Well Mitigation Plan, p1, p3, Idaho-Maryland Mine Draft DEIR (December 2021).
[3] EMKO Environmental, Inc. (2020). Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project, Nevada County, California. [4] Appendix K.7 West/Yost Peer Review (August 27, 2020), p8-9, p18, Idaho-Maryland Mine Draft DEIR (December 2021).
[5] Todd Engineers (2007), Final Report Hydrogeologic Assessment Idaho-Maryland Mine, prepared for Idaho-Maryland Mining Corporation, August t.p22, p25, p26.
[6] Idaho-Maryland Mine Project Draft EIR (2008) p4.7-34.
[7] Idaho-Maryland Mine Project, Revised Project Description (May 2011) Appendix N-T-3.
[8] June Oberdorfer, PhD., Certified Hydrogeologist, Review of the March 2020 EMKO Groundwater Hydrology Report, Minewatch Virtual Community Meeting Video Presentation (October 2021).
[9] Steve Baker, Certified Hydrogeologist, Response Comment Letter to 2008 Idaho Maryland Mine DEIR.
[11] Idaho-Maryland Mine Project Draft EIR (October 2008) 4.8 Hydrology and Water Quality, p 4.7.29.
[12] Draft Environment Impact Report for The Idaho-Maryland Mine (May 1995) p4.3-5.
[13] Appendix K.3, Itasca Denver Inc., "Groundwater Model Report", November 2020, p31.
[14] Houmau Liu, hydrogeologist for Itasca, February 9, 2022 NID board of directors meeting.
[15] Idaho-Maryland Mine Project DEIR Report, December 2021, 4.8 Hydrology & Water Quality, p67.

GROUP LETTER 28: THE WELLS COALITION

Response to Comment Grp 28-1

The commenter implies that the project is not in compliance with Nevada County General Plan Policy 17.12, but does not provide details on why the commenter believes the project is inconsistent in this comment. The commenter's specific comments are addressed below in Response to Comments Grp 28-2 through Grp 28-8.

Response to Comment Grp 28-2

The commenter implies that the project is not consistent with County General Plan Policy 17.12 based on statements from the County's independent groundwater expert, West Yost, made upon reviewing the draft groundwater analysis. However, the peer-review comments by West Yost that are referenced by the commenter were previously addressed by revisions to Technical Reports during the preparation of the DEIR; thus, the statements quoted by the commenter relate to a preliminary draft of the groundwater analysis and do not represent the final analysis presented in the DEIR. Moreover, consistent with County General Plan Policy 17.12, Mitigation Measure 4.8-2(b) already requires replacement water for any well impacted by the project; thus, the project is consistent with County General Plan Policy 17.12.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

As stated in Section 5.2 of Appendix K.2 of the DEIR, the following discussion addressed West Yost's peer-review comments:

> During mining, there will be a net inflow of groundwater into the underground workings due to the on-going dewatering. Any residual constituents associated with blasting would be contained within the water pumped from the mine workings and would not affect the quality of the groundwater outside of the mine workings. The treatment plant is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. The net inflow of groundwater into the underground workings would also ensure that mining activities such as blasting, backfilling with CPB, or sealing of drains would not have the potential to affect domestic supply wells during the active mining and dewatering period.

The proposed mining areas will primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at greater depths, typically more than 1,000 feet below the surface and deeper (see Figures 5-1 and 5-10 of Itasca, 2020b). At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, as shown on Figures 3-9 and 3-10, due primarily to the lack of open fractures as a result of the large pressures exerted by the overlying rock mass (i.e., the lithostatic pressure). Since the new mining activity would occur at equivalent or greater depths than the proposed mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater

in the domestic supply wells that are completed at much shallower depths. Please also see Master Response 7 – Location of Future Mining Areas.

There is currently no evidence to indicate that the historic underground mine workings have caused any water quality impacts at any domestic well. During mining, there will be a net inflow of groundwater into the mine workings, such that any mining activities would not affect water quality within the fractured bedrock. After mining ceases, conditions would return to those that currently exist. The proposed new mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. Due to the substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, it is highly unlikely that the proposed project would affect water quality in those wells.

Further, as stated in Section 6.0 of Appendix K.3 of the DEIR, the following discussion addressed West Yost's additional peer-review comments referenced by the commenter:

> The model is constructed based on the available data. Because of the fractured nature of the intermediate and deeper geologic units, one may argue that unknown fractures may impact the results of the modeling. Fractures or geologic discontinuities decrease with depth due to the weight of overlying geologic materials. The mining will occur in the deeper geologic units where the fractures, if present, are closed or have smaller apertures, which will not transmit significant quantities of water. The scenarios addressed in the modeling cover a wide range of probable situations that may be encountered and the potential impacts to groundwater levels and surface-water baseflows. …Itasca recommends a rigorous groundwater monitoring program to assess how the hydrogeologic system responds to mining, whether the measured results are within those modeled under the various scenarios.

As such, contrary to the commenter's assertion, West Yost's peer-review comments were addressed, the County's independent expert does not have the "expert opinion" that the project will impact more wells than disclosed in the DEIR's analysis. Moreover, Mitigation Measure 4.8-2(b) already requires replacement water for any well impacted by the project; thus, the project is consistent with County General Plan Policy 17.12.

Response to Comment Grp 28-3

The commenter cites statements from a Todd Groundwater analysis prepared in 2007 for a previously proposed mining project. While the commenter uses the cited language to imply that the prior groundwater study reached different results, in actuality, previous assessments including the Todd Groundwater report have come to similar conclusion as the current analysis despite the use of simplistic analytic solutions. Please see Master Response 13 – Historic Hydrogeologic Assessments.

As was requested for the previously proposed project by Todd Groundwater, for the current project, groundwater monitoring is required for a larger area than just the expected impact zone. (see Mitigation Measure 4.8-2(a) and Appendix K.8 of the DEIR).

Please also see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 28-4

The commenter cites to language from materials prepared for a previous Emgold project at the same site in 2008 and 2011. The 2008 Emgold DEIR came to similar conclusion as the current

analysis despite the use of simplistic analytic solutions. Please see Master Response 13 – Historic Hydrogeologic Assessments.

As was requested for the previously proposed project in the cited language, groundwater monitoring is required for the current project (see Mitigation Measure 4.8-2(a)). Mitigation Measure 4.8-2(b) also requires the mine operator to guarantee continuous water supply for properties surrounding the project in the event of drawdown impacts. (See Mitigation measures 4.9-2 (b) and 4.8-2(c).)

Please also see Master Response 7 - Location of future mining areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Grp 28-5

The commenter cites to a video presentation by June Oberdorfer in October 2021 (footnote 8). A specific comment was submitted on the DEIR by June Oberdorfer regarding calibration of the groundwater model. Please see the response to referenced Oberdorfer comment - Response to Comment Grp 8-128.

The commenter also refers to language from a comment letter submitted by Steve Baker on a previous DEIR in 2008 (footnote 9). Steven Baker submitted a comment on the current DEIR, asserting that fractured bedrock cannot be modelled for groundwater impact purposes. Please see Responses to Comment Letter Ind 29 (Steven Baker Letter). Contrary to the assertions in the submitted Steven Baker letter, the groundwater model was compared against water levels measured in wells in the mine area, and was found to be accurately calibrated as compared to the measured water levels. (Section 4.5 page 22). This correlation contradicts the assertions made in the quoted language that the model cannot predict groundwater levels in a fractured bedrock system.

The commentor refers to the 2008 Idaho-Maryland Mine Project DEIR page 4.7.29 (footnote 11). The hydrogeologic studies used for the 2008 DEIR came to similar conclusions as the current DEIR despite the use of simplistic analytical solutions. Please see Master Response 13 - Historic Hydrogeologic Assessments. Like the current DEIR, the previous 2008 DEIR found the impact to groundwater wells was potentially significant and proposed mitigation measures to reduce the impact to a less than significant level. See Impact 4.8-2 of the DEIR.

The commentor refers to the 1995 Idaho-Maryland Mine DEIR page 4.3.5 (footnote 12). Like the current DEIR, the previous 1995 DEIR found the impact to groundwater wells was potentially significant and proposed mitigation measures to reduce the impact to a less than significant level. See Impact 4.8-2 of the DEIR.

Please also see Master Response 7 - Location of future mining areas, Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Grp 28-6

The commenter provides language from the Itasca groundwater study that provides background on how Itasca modelled possible expansion of mining for Sensitivity Scenario 6. Please see Response to Comment Grp 7-82 in CEA Letter #1.

Itasca analyzed the impacts of new underground mining excavations based upon information provided by the applicant, as shown on Figure 5-1 of Appendix K.3 and Sheet 15 of Appendix K.2. As shown in these figures, assumed mining areas are based on the projected down-dip extensions to mineralized veins historically mined. Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization, as shown in Figure 5.10 of Appendix K.3. As shown in Figure 5-12, the major mining expansion studies in Scenario 6 did not result in a significant expansion in the simulated 5-foot drawdown contour versus the base case.

As stated on page 31 of Appendix K.3, while the targeted mining areas analyzed in the groundwater model are accurate and representative of where mining will occur in the near and mid-term, it is expected that over time the actual mining areas will change from the modeled mining areas due to vein geometry and discoveries, which will only be known after extensive underground exploration is completed in the future. Itasca recommends that the groundwater flow model be updated periodically after dewatering commences. Updated modeling would incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates. The DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess drawdowns in the water-bearing zones. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Mitigation Measure 4.8-2(a) requires that a projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. If the water level impact assessment showed a potential impact to wells outside of the E. Bennett area, assuming the 100% safety factor, the applicant would be required to mitigate this impact before it occurs in accordance with Mitigation Measure 4.8-2(b). The mitigation would be for properties which may be potentially impacted as determined in the projected water-level impact assessment. As

discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The 10% drawdown threshold of significance is extremely conservative and, in most cases, would not lower the water level below the casing of the domestic well. Therefore, well mitigation may not be required after inspection. If reduction of the water column was great enough to reduce the well's yield, a simple adjustment to the pumping system may only be required. For example, by pumping at a lessor rate over a longer duration and if necessary, installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service to a group of wells. The Well Mitigation Plan has been modified to clarify the actions that would be taken as described above. Please see Appendix D to this Final EIR for the Revised Well Mitigation Plan.

Nonetheless, as discussed in Master Response 7 – Location of Future Mining Areas, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area.

In addition, as noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Grp 28-7

The commenter cites verbal statements from a hydrogeologist at Itasca who was speaking at a Nevada Irrigation District (NID) meeting relating to the water supply assessment under consideration by NID at that hearing. The Itasca hydrogeologist noted that monitoring wells had not yet been installed, and that there is never 100% certainty in groundwater level predictions. The commenter cites this language to imply that the lack of 100% certainty, and the DEIR's requirement to obtain data as part of the groundwater monitoring plan after project approval, is a violation of CEQA. However, CEQA does not require 100% certainty, as this could never be achieved. Rather, as stated by California Courts, "[t]he need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn., supra,* 47 Cal.3d at p. 406.)

The analysis provided in Impact 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. No significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, Beaver or other areas. The predictions include the use of a 100% safety factor, multiple sensitivity scenarios, and have been peer reviewed by the County's independent expert consultant. This sensitivity analysis addresses the uncertainties in the data used as inputs to the model. The sensitivity analysis showed that variations in the input parameters (such as hydraulic conductivity) did not change the predicted drawdowns significantly, primarily due to the low permeabilities of the deep rock in which mining will occur.

Page 25 of Appendix K.3 acknowledges that there are uncertainties in groundwater modelling and states that the predicted contours are based upon the numerical groundwater flow model and the assumptions inherent in the model. Actual, in-field measured water levels may be different from the predicted water levels due to heterogeneities in the hydrogeologic system. The DEIR acknowledges that without the implementation of a groundwater monitoring program and well

mitigation plan, the project could result in a significant impact to groundwater supplies. Despite the lack of 100% certainty (which is impossible and not required for CEQA analysis) the DEIR provides very conservative analysis of groundwater impacts, and also provides mitigation to the expected impact area and guaranteed water replacement for other areas in case there are future unexpected impacts.

Response to Comment Grp 28-8

The commenter asserts that the overwhelming consensus of the experts is that the project will threaten the water quality and quantity of adjacent businesses and homes and is therefore inconsistent with County Policy 17.12. However, the commenter's selective quotes from various studies and documents mischaracterizes the relevant information. Moreover, County Policy 17.12 requires where such threats exist, that the mine operator guarantee a replacement supply of water, which is already incorporated into the DEIR's mitigation requirements; thus, the project is consistent with County Policy 17.12. Finally, the County has discretion to determine which expert opinion to adopt. CEQA case law has been clear for decades that a disagreement among experts does not make an EIR inadequate. (See, e.g., *Association of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1396; CEQA Guidelines § 15151.)

The analysis in the DEIR has defined the potential impacts to groundwater levels. Additional groundwater level data is not required for analysis of the DEIR and would not change the conclusions of the EIR.

Groundwater monitoring is required for the project (see Mitigation Measure 4.8-2(a)). Well mitigation is required to guarantee continued water supply for properties surrounding the project (see Mitigation measures 4.9-2 (b) and 4.8-2(c). Therefore, the project complies with Nevada County General Plan Policy 17.12.

The analysis provided in Impact 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. Pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. No significant impacts to domestic water wells are predicted in the Greenhorn, Woodrose, Beaver or other areas. The predictions include the use of a 100% safety factor, multiple sensitively scenarios, and have been peer reviewed by the County's independent expert consultant. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies.

A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR, the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented.

Mitigation Measure 4.8-2(a) (1) requires water-level monitoring data for a minimum of 12 months before commencement of dewatering of the mine. This data will be used to establish the baseline for each well before commencement of mine dewatering.

The collection of groundwater level data through the proposed monitoring wells (required by Mitigation Measure 4.8-2(a)) would not by themselves provide information needed to assess the potential impacts of the project to groundwater levels in the EIR. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining,

is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones, for example, the fractured bedrock at the project site, propagate with time as a result of pumping. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Obviously, the dewatering of the mine workings cannot take place until the appropriate permits are in place and the CEQA process is complete.

Nonetheless, as noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Group Letter 29

From: Jonathan Keehn
To: Idaho MMEIR; Matt Kelley
Cc: gary and christine griffith and nys
Subject: Preliminary Comments from WCCA on IMM DEIR
Date: Thursday, February 3, 2022 5:54:18 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To: Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902
email Idaho.MMEIR@co.nevada.ca.us

From: Wolf Creek Community Alliance
P.O.Box 477
Grass Valley, CA 95945

Re: Comments on DEIR for proposed re-opening of Idaho-Maryland Mine

February 3, 2022

Dear Matt Kelley,

As a local watershed organization working to promote environmental health for the benefit of our community we welcome the opportunity to be involved in offering comments on the draft environmental impact report (DEIR) for the proposed Idaho Maryland Mine. Previously, we submitted scoping comments following the Notice of Preparation (NOP). As we work to carefully consider the DEIR, however, we have been met with a number of obstacles that suggest an extension for the DEIR comment deadline is in the public interest.

Grp 29-1

First, the lives and routines of most members of our community have been severely disrupted by the impacts of the late December storm that caused much damage and extended outages. Some of us have lost power for two weeks and internet for four weeks. This disruption occurred just as the DEIR was submitted on January 4th. Thus, many community organizations and individuals have had significantly less time to start reviewing the DEIR.

Secondly, the DEIR is immensely complex, very lengthy and very technical. The potential impacts to our community are also very large and long-lasting. Sufficient time to

process the details of the DEIR is essential for full public participation.

Third, the DEIR, although it organizes comments received on the NOP in section 1.8 of the introduction and includes all comments in an appendix, nonetheless makes it very difficult to see that the 25 areas of concern we submitted in our comment to the NOP are actually addressed in the DEIR. Nowhere are our concerns specifically noted or footnoted in the text. Section 1.8 simply indicates in which chapter various concerns are addressed. We are left, then, to 'sift' through many pages of text hoping to find sections or appendixes that address our concerns.

As it is, upon reading section 1.8 we do not see listed any concern items mentioning "monitoring plan for South Fork Wolf Creek," "monitoring for benthic macroinvertebrates," inaccuracies to "perennial stream" designations, "enforcement of permits," "surveys of trout," "alternatives to dewatering" via South Fork Wolf Creek, "Centennial Drive and Spring Hill Drive realignment," "property values," low viability of "transplanting" Pine Hill flannelbush, inclusion of "climate change modeling" including "higher intensity storms," "waste rock" causing increased TDS in Wolf Creek, "oversight," "enforcement," "fines," and "bonding," all specific concerns included in our comment letter to the NOP. Section 2.1 of the DEIR does seem to refer to a few of these unlisted issues, but others seem to be absent and ignored.

A better system should have been devised whereby concerns were cross-referenced to the actual comment letters so that the public could easily see how and whether their concerns were addressed. Surely, Raney, in their due diligence carefully checked that each individual concern raised following the NOP was considered. Some mechanism showing that should have been included. As it is, the DEIR is far less accessible to public participation than it should be to satisfy CEQA requirements.

For these reasons, all in the public interest, we have two requests:
1) That the DEIR comment period be extended by at least 30 days.
2) That the County circulate an index that will allow the public to easily verify that our concerns submitted during the NOP scoping process are addressed in the DEIR.

Thank you for your consideration of these requests, and for all you do to preserve, promote, and protect the well-being of our County.

Please acknowledge receipt of these preliminary comments.

Sincerely,

Jonathan Keehn
Gary Griffith

Board of Directors
Wolf Creek Community Alliance
530.913.2347 mobile
web: *WolfCreekAlliance.org*

Many thanks for your support, donations, or volunteer effort!
"Do unto those downstream as you would have those upstream do unto you." Wendell Berry

GROUP LETTER 29: JONATHAN KEEHN, WOLF CREEK COMMUNITY ALLIANCE

Response to Comment Grp 29-1

The commenter requests an extension of the DEIR public review period. CEQA requires a minimum 45-day public review period for DEIRs submitted to the State Clearinghouse (PRC 21091). In response to public comment, the County elected to provide an extended DEIR review period of 91 days from January 4, 2022, to April 4, 2022.

The commenter requests an index that will allow the public to easily verify that their concerns submitted during the Notice of Preparation are addressed in the DEIR. No such index is required under CEQA. The commenter also provides a list of general concerns which are brought up in their subsequent comment letters on the DEIR. Please see Responses to Group Letters 30 and 31.

Group Letter 30

From: Wolf Creek Community Alliance
P.O.Box 477
Grass Valley, CA 95945

To: Members of the Nevada County Planning Commission,
Nevada County Board of Supervisors,
and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
matt.kelley@co.nevada.ca.us

3/30/2022

Comments on the Idaho-Maryland Mine DEIR
Follow-up on WCCA NOP Comment submittals of August 16, 2020 and December 22, 2019.
Copies of both submittals are copied below for your convenience.

To All Concerned:

Most of the issues we raised in the letters referenced above were not properly addressed in the current Draft Environmental Impact Report (DEIR) for the IMM project. The purpose of the Notice of Preparation is to ask interested parties, such as ourselves, to point out substantive issues that should be addressed in the CEQA process and specifically in the DEIR. Because the DEIR did not adequately address these issues, we request that the DEIR be revised and recirculated to the public and agencies.

Grp 30-1

Following is a breakdown of the 25 issues raised in the 8/16/2020 letter, and the additional issue raised in the letter of 12/22/2019. It is possible that some of these issues were in fact addressed somewhere in the DEIR, but we were unable to locate them. If that is the case please direct us to the correct pages.

Grp 30-2

1 & 2) Surface water monitoring program. We are suggesting a robust surface water quality monitoring program, at least in South Fork Wolf Creek, beginning before the start of the project to provide several years of baseline data. The program should extend through the working life of the proposed project, and several years after decommissioning. These issues were partially addressed in Chapters 4.4 and 4.8, but the monitoring plan was not discussed, and many of our questions were not answered.

Grp 30-3

3 & 4) 48" culvert, pond, SFWC headwaters. We did find some discussion of this issue in the DEIR, but it was insufficient. We stand by the statements in the letters: that SFWC is a perennial "water of the US" upstream to and beyond Brunswick Road. The same is

true for the pond (PD-1). The DEIR must propose a Project Alternative that would include day-lighting of the creek and protecting these important riparian resources.

Grp 30-4 **9) Hydrology.** There is some discussion of Hydrology in Chapter 4.8, but the analysis was based on insufficient data. The specific questions we asked were not answered in the DEIR.

Grp 30-5 **16) Interpretation of LUDC L-II 4.3.17.** On these large properties, avoidance of impacts is possible, therefore no exceptions to the development code should be allowed.

Grp 30-6 **17, 18, & 23) Flannelbush, frogs, and other listed species.** This issue is addressed in Chapter 4.4, but the mitigations suggested are not sufficient to protect these species, and the comments and questions we submitted were not resolved in the DEIR.

Grp 30-7 Below are the remaining items from our NOP comment letter. They were either not addressed in the DEIR, or our specific questions were not answered.

5) Timber Harvest Plans

Grp 30-8 **6) Ongoing Enforcement of Permits**

Grp 30-9 **7) Protection and Monitoring of Rainbow Trout**

Grp 30-10 **8) Alternatives for Mine Water Discharge**

Grp 30-11 **10) Surface and groundwater.**

Grp 30-12 **11) Realignment of Centennial and Springhill Drives.**

Grp 30-13 **12 & 13) Public trails.**

Grp 30-14 **14) Wells.**

Grp 30-15 **15) Loss of tax revenue.**

Grp 30-16 **19) Flooding.** The contradictory findings were not addressed in the DEIR.

Grp 30-17 **20) Climate Change.**

Grp 30-18 **21) Nitrification/ammonia nitrate.**

Grp 30-19 **22) Centennial surface waters.**

Grp 30-20 **24) 100' and 50' buffer zones.**

Grp 30-21 **25) Adequate bonding.**

Grp 30-22 In summary, we reiterate our concern that many issues raised in our NOP comments to you, in 2019 and 2020, were not addressed, and/or specific questions were not answered in this DEIR. We believe this violates the intent of the environmental review process as required by CEQA. These deficiencies, and others, should be corrected, and the Draft EIR should be recirculated to the public and agencies.

Thank you.

Jonathan Keehn
Gary Griffith
Wolf Creek Community Alliance

August 16, 2020
Matt Kelley, Senior Planner
Nevada County Planning Department, 950 Maidu Ave., Suite 170
Nevada City, CA 95959
Re: Rise NOP Comments
Dear Mr. Kelley,
Thank you for the opportunity to comment on this project.

Grp 30-23 As you know, we have found it extremely difficult to fully understand the scope of the documents provided because of the very short time period allotted to research it. The video slide show distributed by the Planning Department in late July left only 20 days for most folks to locate, review, read, try to understand some very complicated data, and then collect our thoughts into a coherent letter before submitting them to you. And that is only for people with good internet; others have almost no way to find the documents, much less respond in a meaningful way.

Nonetheless a volunteer crew of concerned citizens have managed to put together this preliminary list of comments. We hope you will extend the comment period to fully comply with CEQA's goal of allowing the general public adequate time to comment.

Grp 30-24 1. The EIR must describe a comprehensive monitoring plan for South Fork Wolf Creek (SFWC) and its watershed. Here is a sample of questions that must be answered in the EIR regarding this monitoring plan: What kind of pre-project monitoring of South Fork Wolf Creek (SFWC) will be done to establish baseline data for water quality? What type of ongoing monitoring will be in place during the dewatering process, to ensure there is no deleterious effect on water quality? What is the proposed monitoring program for water quality in SFWC during the 80-year life of the project? Who will oversee this monitoring, and what structure will be in place to enforce compliance? Who will pay for this? The parameters monitored should include, but are not limited to: pH, water temperature, dissolved oxygen levels, dissolved solids, turbidity, nitrogen, phosphorus, heavy metals, manganese, iron, other mining residue. Please provide a scientific design of the proposed monitoring program, including suitable goals, exceedance levels, etc.

Grp 30-25 2. Please describe similar monitoring plans for other important riparian parameters, including but not limited to: benthic macroinvertebrates (BMIs), physical habitat, canopy coverage, and sediment loading.

Grp 30-26 3. Contrary to the report in the applicant's submitted documents, SFWC is a perennial stream, fed by two streams above Brunswick, flowing through the entire Brunswick site, not just the downstream half. As per definitions in Nevada County LUDC Sec. L-II 4.3.17 B:

*3. **Watercourses, Perennial** - Natural or once natural flowing bodies of water, including*

natural waterways that have been channelized, which flow continuously through a bed or channel having banks. All streams, creeks, lakes, ponds and reservoirs shown on the 7.5 minute USGS maps as perennial are included in this definition unless professional evaluation determines the watercourse to be intermittent or seasonal.
SFWC is a blue line on 7.5 minute USGS maps all the way through the Brunswick property.
WCCA has been collecting data from our monitoring site upstream of Brunswick Road on Woodrose for 10+ years, and we dispute the finding in the submitted Management Plan that the upstream portion of the stream on this property is not perennial. The fact that a previous property owner "channelized" a portion into a 48" culvert is not sufficient evidence to determine whether this stream is perennial or intermittent. The EIR must describe how the entire length of the creek on the property will be protected with minimum 100' setbacks during the life of the project, and how the creek will be restored to a fully functioning healthy creek during and after the project. Please see our letter to Matt Kelly regarding this matter dated 12/22/2019, attached hereto.

4. Whether the steam is determined to be perennial or intermittent, the setbacks required by the county LUDC must be maintained throughout. Any work performed, including the proposed removal and replacement of the culvert, will require special permits for streambed alteration etc. from (including but not limited to) California Fish and Wildlife, USACE, Cal SWRCB, etc. The EIR must describe the status of these permit applications, and the scope of work proposed. Please note that the applicant violated the County's minimum setback requirements (twice) in 2018, and was required to submit a second Management Plan because the first one was insufficient. See The Union Other Voices, 6/24/2020: https://www.theunion.com/opinion/columns/jonathan-keehn-reopening-idaho-maryland-mine-still-a-bad-idea/

Grp 30-27

5. Please describe the status of CalFire Timber Harvest permits, or other forest harvesting permits that may be required for the life of this project. Please note that the applicant was cited for violations in this regard on March 29, 2018, attached hereto.

Grp 30-28

6. The EIR must delineate how the on-going enforcement of these permits (and any others required) will be achieved over the 80-year life of the project, and the reclamation/maintenance phase post-project. e.g: Who will be enforcing them and collecting fines if any aspect of the project is found to be in violation of the spirit and intent of a permit, whether or not the original enforcement agency is still in existence?

Grp 30-29

7. SFWC has populations of native rainbow trout that are highly sensitive to warm water and other changes in their habitat, as are many of the macroinvertebrate species that they

Grp 30-30

feed on. The EIR must describe how these fish and their habitat will be protected. This program would include, but not be limited to twice-yearly surveys of trout and BMIs downstream from the project, to monitor the effect of the project on trout.

Grp 30-31

8. The applicant has determined that SFWC is the proper conduit for discharge of all dewatering. However, the previous property owner (Emgold) went to great lengths to determine that a better solution would be to pipe the discharge to the main stem of Wolf Creek. The EIR must describe these former studies, assumptions, and findings, and describe why the current project applicant disagrees with the previous discharge analysis in favor of the current proposal. Alternative methods of disposal of the water must also be analyzed by the EIR, e.g. trucking off-site.

Grp 30-32

9. The EIR must address the following questions regarding the hydrological impact of dewatering: What is the level of confidence of the accuracy of the hydrological studies regarding dewatering? Describe the impacts of dewatering on ground water, surface water, riparian habitat, wetlands, and wells in the Wolf Creek watershed and beyond. What structure will be in place to measure negative impacts? What action thresholds have been set that will trigger remediation and fines if any negative impacts to the water resources of Nevada County and the Wolf Creek watershed occur? Who will enforce the rules, and who will pay for remediation? Please describe the public notification process, including real-time updates of all monitoring programs, in an easily-searchable data-base.

Grp 30-33

10. The project plan includes extensive exploratory drilling operations under neighboring properties and watersheds. The EIR must address the impacts on water resources (including but not limited to ground water, surface water, riparian zones, wetlands, and wells) of both the exploratory operations and the mining operations. How will negative impacts discovered by the monitoring program be remediated? What is the plan to halt operations, when significant changes in the water table are discovered, and how will alternative plans be made to stem the tide of destruction and depletion? In addition to SFWC, we are concerned about the main stem of Wolf Creek, the wetlands on the Centennial site that drains into Wolf Creek, all ephemeral and intermittent streams in the watershed, and the wet meadow on East Bennett Road that is on Empire Mine State property. How will these be monitored, and how will the general public and concerned citizens know if these wetlands and riparian areas are becoming degraded due to changes in the hydrology? And what will be done when negative impacts are discovered?

Grp 30-34

11. At the Centennial Site, the maps show that Centennial Drive and Spring Hill Drive are to remain in their current locations. However, the city of Grass Valley intends to realign this intersection, which would impact Wolf Creek proper, and its riparian zone. How will this

project be designed to accommodate the realignment? How will the realignment be constructed in a way to enhance the creek and riparian area? The EIR must address these issues collectively as part of this project, because of their anticipated cumulative effects, and not separately or piecemeal.

Grp 30-35

12. How will the project enable and enhance the city's plan to create a public trail along the Wolf Creek/Idaho Maryland Road corridor? This project is currently in the design and engineering phase. The EIR must address these issues collectively as part of this project because of their anticipated cumulative effects, and not separately or piecemeal. The EIR must describe any and all easements that will be granted to the city or the County, and the impacts they will have in the riparian corridors.

Grp 30-36

13. The EIR must address how the project will encourage trails and bike path accessibility, both on the Centennial site, the Brunswick site, and East Bennett and Idaho Maryland Roads.

Grp 30-37

14. Please describe how all the wells that might be affected will be monitored before, during, and after the project, including exploration and during the reclamation phase. Describe all the parameters that will be monitored - e.g. well production, water level, clarity, taste, potability, iron, manganese, arsenic, etc. Describe the underground hydrological features that may be affected by dewatering abandoned mine for 80 years, and how these features and activity will affect residential wells.

Grp 30-38

15. Please describe the projected loss to county tax revenues due to depressed property values over the next 80 years.

Grp 30-39

16. Regarding the "Aquatic Resources Management Plan" (Matuzak 2/2020): this report incorrectly interprets Nevada County Land Use and Development Code. LUDC L-II 4.3.17 – which states that any disturbance of wetlands, streams, etc. is to be allowed ONLY if there are no alternatives to a project going forward. *"**Sec. L-II 4.3.1 Purpose** The primary purpose of site development resource standards is to avoid the impact of development projects on sensitive environmental resources and natural site constraints. Where avoidance is not possible....."*
The EIR must describe alternative designs for the project that will avoid the impacts mentioned.

Grp 30-40

17. *Fremontedendron decumbens* (Pine Hill flannelbush) is a federally listed: Endangered and CA listed: Rare, and is known from only 12 populations in Yuba,

Nevada and El Dorado Counties. There is a population of 62 plants on the Centennial site and the project, as currently designed will lead to a loss of 18 plants and impact to another 4 plants. Over one third the population could be lost. This is an unacceptable take for a federally listed plant. A population of this size is very vulnerable and may not survive this level of impact. We would like the Draft EIR to demonstrate that the proposed mitigation described in Mauzak 2/2020 **Centennial Industrial Site *Habitat Management Plan for the Pine Hill Flannelbush (Fremontodendron decumbens)***, will not result in a loss of viability for the population and the meta population. We do not believe that transplanting is at all an option for this species. This genus is almost impossible to transplant when young, much less mature. The EIR must address how this plant will be protected and the population made to thrive on this site. Provide details of how this will be achieved, and include specific, proven methods of successful transplantation, if transplantation remains part of the plan. Provide a "performance based" monitoring plan to assure success of the project at 6 months, at least annually thereafter, for the life of the project and reclamation phase.

Grp 30-41

18. Regarding the **Technical Memorandum for the Idaho-Maryland Mine Project – South Fork Wolf Creek Discharge Biological Resources Assessment** (Matuzak 2019). After this report was completed, the foothill yellow-legged frog was listed by the State of California as Threatened. Because of this recent listing, additional protocol-level surveys of the creek below the Brunswick site, including on the Empire Mine SHP property, must be made, and the reports included in the EIR. The previous study was surprising given how few benthic macroinvertebrates were found. Our organization has several years of data on the BMIs of this location and it scored high for species richness and abundance, making this a prime habitat for trout, yellow-legged frogs, and Western Pond Turtles. The substrate is more than adequate as well for the frogs to lay eggs. New protocol-level surveys must be done by an aquatic biologist with frog experience, and the reports included in the EIR.

Grp 30-42

19. Serious and destructive flooding occurs during large storm events, along the main stem of Wolf Creek behind Mill Street, which is mostly residential. Homes are very close to this channelized portion of the creek and there has been considerable property damage during high water events. The EIR must describe the plan that will be in place to ensure that the water pumped into SFWC will not cause additional flooding along Mill St. and other parts of Grass Valley during high volume precipitation events. Please describe the plan to prevent the spill of toxic waste into the creek during high intensity storms, including remediation and funding sources. The Nevada City Engineering, Inc. (2019) Preliminary Drainage Analysis states that post project storm-water discharge from the Brunswick Site, including the treated mine water discharge of 5.6 cfs, will be *equal to or less than the estimated pre- project storm-water discharge levels*. However, as stated in the report,

the project will be adding an additional 5.6 cfs in perpetuity. The report also states that the construction of the storm-water detention ponds and the project will have *no impact or increase of flows in creeks during storm events* (NCE, 2019). The EIR must address these contradictory findings and describe a remediation plan.

Grp 30-43

20. Please describe the plans to mitigate the effects of climate change over the duration of the project. In the foothills, our main issues are flooding, fire, air pollution, CO2 emissions, carbon-based energy use, and drought. Please address all of these issues. With climate change, we have already, and will continue to experience higher intensity storms. The EIR must describe how these storms will affect the water quality and volume of the dewatering of the mine shafts, the levels of toxic water in your settling ponds, and the amounts of water pumped into the creek. Please describe the measures that will be implemented to reduce the proposed high use of carbon-based energy and your (very high) CO2 emissions. Describe the impact of these proposed emissions on the stated goals for reduced emissions by the City of Grass Valley, the County of Nevada, and the State of California. Please address the measures that will be taken to make your properties fire-safe, in a fire regime that will be increasing in danger over the 80-year life of the project. Please describe the modeling used to anticipate the effects of climate change on all parameters over the life of the project and into the reclamation phase.

Grp 30-44

21. Please describe the plans to reduce nitrification of the creek and environs from the use of ammonium nitrate. Please describe the effects of ammonium nitrate on riparian systems, including but not limited to the range/distance of the effect of ammonium nitrate in general and specifically in the systems that may be impacted by this project.

Grp 30-45

22. The Centennial site has wetlands, ephemeral, and intermittent streams throughout the project area. The EIR must address the impact of the piles of waste rock and whether there will be an increase the total dissolved solids and/or lowering of the pH of the water in these wetland areas, further degrading the water quality before emptying into Wolf Creek. In light of climate change, the EIR must reassess the 100 year floodplain in keeping with the increased likelihood of higher intensity storms on a more frequent basis.

Grp 30-46

23. The EIR must include protocol-level surveys to be done by experts for all Federal and State listed species at both Brunswick and Centennial sites, and also at the precious meadow and riparian sections of the SFWC watershed owned by Empire Mine State Park, just downstream of the Brunswick site.

Grp 30-47

24. The **Centennial Industrial Site Idaho-Maryland Mine Project** ***Watercourse / Wetlands / Riparian Areas Management Plan***, states that, "temporary disturbance or

encroachment may occur within the 100-foot non-disturbance buffer to Wolf Creek due to construction activities though such disturbance is not currently being proposed." This statement is vague and unenforceable. The EIR must make it clear that the project will maintain 100' setbacks to perennial streams, and 50' setbacks from all other water resources throughout the project, and describe the steps that will be implemented to achieve this goal during construction and for the life of the project and reclamation phase. The EIR must describe any sedimentation that may occur as a result of the dust and disturbance caused by the project activities at Centennial on all water resources. Also describe the oversight and enforcement of these rules: how the impacts will be monitored, to whom they will be reported, the fine schedule for violations, and the bond amount that will be posted to ensure compliance.

Grp 30-48

25. The EIR must determine an adequate bonding amount to ensure compliance and remediation of all facets of this project. It must include a financial structure sufficient to protect the County and its citizens from financial harm during every year of the proposed project, including through final reclamation.

Grp 30-49

Thank you again for the opportunity to submit these comments.
Please acknowledge receipt.
Sincerely,

Jonathan Keehn President Josie Crawford Executive Director

Wolf Creek Community Alliance
P.O.Box 477, Grass Valley, CA 95945 Phone: 530.272.2347
Email: wolfcreekalliance@gmail.com
Web: http://www.wolfcreekalliance.org/

"Do unto those downstream as you would have those upstream do unto you." Wendell Berry

Grp 30-50

December 22, 2019
Matt Kelley, Senior Planner 950 Maidu Ave., Suite 170 Nevada City, CA 95959
RE: Rise Grass Valley application for Conditional Use Permit and Reclamation Plan for the Idaho Maryland Mine project – mischaracterization of headwaters of South Fork Wolf Creek (SFWC)
Dear Mr. Kelley
Please review the following wording in the applicant's document, which can be found at page 17 (labeled pg 13) at:
https://www.mynevadacounty.com/DocumentCenter/View/31023/Applicants-Project-Description
"A buried 48-inch culvert crosses the Brunswick Industrial Site. The culvert transports off-site surface drainage from Brunswick Road. South Fork Wolf Creek originates from the outlet of this 48-inch culvert. As shown on Sheets 1 and 2, this culvert will be upgraded and replaced to avoid proposed facilities and development. The new 48-inch culvert will discharge at the same location as the existing 48-inch culvert."
This is not an accurate description. The 48" culvert does much more than simply "transport off-site surface drainage from Brunswick Road". In fact it conveys all of the upstream reaches of the headwaters of South Fork Wolf Creek. There are springs and streams on the east side of Brunswick Road that flow through a culvert under the road, and there is a significant stretch of SFWC on the west side of Brunswick Road before it enters into the grated 48" culvert. There is important riparian habitat along all of these reaches, including on the subject property, that must be protected.
As you may know, Wolf Creek Community Alliance manages a robust water-quality monitoring program all over the Wolf Creek Watershed that has been operating continuously since 2003. We currently monitor 25 sites, one of which (Site 6.1) is on SFWC on the upstream (east) end of the Brunswick Road culvert. We call this site the SFWC Headwaters Site, but in fact the headwaters are farther to the east, up Wood Rose Road.
Any project that may come before you on the property currently owned by Rise GV should include daylighting this important stretch of SFWC that is currently in a 48" culvert. This stretch should be restored to a healthy open creek with a functioning riparian zone with habitat for a viable fish population.
Many thanks for the opportunity to comment.
Jonathan Keehn
Wolf Creek Community Alliance
P.O.Box 477, Grass Valley, CA 95945
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Web: http://www.wolfcreekalliance.org/

GROUP LETTER 30: JONATHAN KEEHN, WOLF CREEK COMMUNITY ALLIANCE

Response to Comment Grp 30-1

Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

Response to Comment Grp 30-2

The commenter suggests a surface water monitoring program, at least in South Fork Wolf Creek, during the project, and which would extend after the end of the project, and refers to Comments #1 and 2 of their August 16, 2020 NOP comment letter. However, the commenter does not identify any significant impacts that would be avoided or reduced by this suggestion. As discussed in DEIR Section 4.8.2, extensive monitoring of South Fork Wolf Creek was conducted to prepare the technical studies that support the hydrology and biology impact analyses. As discussed in Impact 4.8-1, monitoring will be required by the project's Regional Water Quality Control Board Limited Threat Discharge Permit, Report of Waste Discharge, and Industrial General Permit demonstrating compliance with standards that prevent degradation of water quality throughout the life of the project. Monitoring will be paid for by the applicant and enforced by the County and the RWQCB. As such, surface water monitoring will already be required as part of mitigation imposed on the mine operator, and the RWQCB will have enforcement authority based on that monitoring data.

Please also see Response to Comment Grp 30-25.

Response to Comment Grp 30-3

The commenter asserts the upstream and offsite portion South Fork Wolf Creek is a perennial water of the United States. The DEIR, including Appendix F.7, identifies the onsite portion of South Fork Wolf Creek as perennial. The upstream portion of South Fork Wolf Creek is offsite and would not be impacted by the project. The existence of the culvert is the baseline condition for the project and the restoration to an open creek as suggested by the commenter is not required by CEQA.

The commenter also asserts the onsite pond is a perennial water of the United States. The DEIR, and Appendix F.7, identifies the onsite pond as a historic man-made clay-lined pond that was associated with historic saw milling operations. The pond is not a jurisdictional "water of the United States" as it is an industrial pond built and maintained for industrial purposes. (DEIR, p. 4.4-15.) Water is typically found in the pond year-around.

Section 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. (See CEQA Guidelines, Section 15126.6(a).) The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the

public and decisionmakers. The commenter's suggested alternative would not avoid any significant impacts of the project, but would include a creek restoration component that has no nexus to the project's impacts. As such, this alternative is rejected from further consideration.

Response to Comment Grp 30-4

The commenter states generally that the hydrology analysis in the DEIR was based on insufficient data, but does not provide any specific comments on the DEIR's analysis or data. The commenter references several related questions the organization raised in its August 16, 2020 NOP comment letter and states that many of the questions were not answered in the DEIR. The commenter specifically references Comment #9 of the NOP comment letter. Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, and Master Response 35 -Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. In addition, please see Response 30-29 regarding enforcement of conditions of approval, mitigation measures, and agency permits.

Response to Comment Grp 30-5

The commenter cites the portion of the County Land Use and Development Code (L-II 4.3.17) regarding "watercourses, wetlands, and riparian areas" and asserts no exceptions to the development code should be allowed on large properties where avoidance is possible. This portion of the County Code includes in its purpose an objective to "minimize the disruption of watersheds and watercourse"; however, avoidance is not required. DEIR Chapter 4.9 analyzed the project's consistency with the General Plan and applicable development code requirements. The project was determined to be consistent with the General Plan and development code, and therefore this impact was considered less than significant. Please see Response to Comment 31-58 regarding infeasibility of wetland avoidance.

Response to Comment Grp 30-6

The commenter asserts that mitigation measures for flannelbush, frogs and other listed species were insufficient and refers to Comments #17, 18, and 23 of their August 16, 2020 NOP Comment Letter.

Regarding Comment #17, the commenter generally questions the effectiveness of transplantation for Pine Hill flannelbush. As explained in Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prohibited and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) and the draft management plan provides alternative maintenance transplantation measure to help achieve success criteria.

Regarding Comment #18, please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. Contrary to commenter's assertion, protocol level surveys are not required for CEQA.

Regarding Comment #23, where impacts were identified, mitigation measures have been provided requiring additional agency permitting and surveys. These surveys will be conducted in

the appropriate areas based on the potential for surface disturbance and by qualified professionals. Protocol level surveys are not required for the purposes of CEQA.

Response to Comment Grp 30-7

The commenter asserts that timber harvest plans were not addressed in the DEIR; however, timber harvest plans were discussed in DEIR Section 4.2.3 and Impacts 4.2-3 and 4.2-4.

Response to Comment Grp 30-8

The commenter asserts that ongoing enforcement of permits was not addressed in the DEIR; however, on page 2-4 of the DEIR, the County stated that the mitigation measures would be incorporated into a mitigation monitoring and reporting program that will be enforced by the County.

Response to Comment Grp 30-9

The commenter states that protection and monitoring of rainbow trout was not addressed in the DEIR. Please see DEIR Section 4.4.4 and Master Response 34 - Resident Fish.

Response to Comment Grp 30-10

The commenter states that alternatives for mine water discharge were not addressed in the DEIR, and refers to Comment #8 of their August 16, 2020 NOP Comment Letter. Please see Response to Comment 30-31. In addition, Section 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Response to Comment Grp 30-11

The commenter asserts that surface and groundwater were not addressed in the DEIR, and refers to Comment #10 of their August 16, 2020 NOP Comment Letter. However, DEIR Chapter 4.8 includes comprehensive analysis of surface and groundwater baseline conditions, project impacts and mitigation measures. Please see Response to Comment 30-33.

Response to Comment Grp 30-12

The commenter asserts that the DEIR did not properly address the realignment of Centennial and Springhill Drives. However, the project does not propose realignment of Centennial and Springhill Drive and no potentially significant traffic impacts were identified where mitigation requiring realignment would reduce any impact to a less than significant level. Please also see DEIR Chapter 4.12.

Response to Comment Grp 30-13

The commenter asserts that the DEIR did not address public trails, and refers to Comments #12 and 13 of their August 16, 2020, NOP Comment Letter. Please see Responses to Comments Grp 30-35 and Grp 30-36.

Response to Comment Grp 30-14

The commenter generally asserts that "wells" were not addressed by the DEIR, and refers to Comment #14 of their August 16, 2020, NOP Comment Letter. However, DEIR Chapter 4.8 provided a comprehensive discussion of groundwater wells and the potential for the project to lower the water levels of surrounding wells. In addition, please see Master Response 7 - Location of Future Mining, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring.

Response to Comment Grp 30-15

Comment noted. Please see Master Response 1 - Non-EIR/Administrative, and Master Response 2 - Social and Economic Impacts.

Response to Comment Grp 30-16

The comment generally states that flooding and the contradictory findings were not addressed in the DEIR, but does not identify what specific impacts or contradictory findings were not addressed. Please see Response to Comment 30-42.

Response to Comment Grp 30-17

The commenter asserts that climate change was not addressed in the DEIR; however, DEIR Chapter 4.3 analyzes the project's impact on greenhouse gas emissions and associated climate change impacts. Please also refer to Master Response 16 – Drought and Climate Change. Emissions of greenhouse gas impacts were considered less than significant after mitigation.

Response to Comment Grp 30-18

The commenter generally asserts that the DEIR did not address nitrification/ammonia nitrate, and refers to Comment #21 of their August 16, 2020 NOP Comment Letter. Please see Response to Comment 30-44.

Response to Comment Grp 30-19

The commenter asserts that the DEIR did not address the project's impacts on Centennial Site surface waters, and refers to Comment #22 of their August 16, 2020 NOP Comment Letter. Please see Response to Comment 30-45.

Response to Comment Grp 30-20

The commenter asserts that the DEIR did not address the project's impacts on 100' and 50' buffer zones, and refers to Comment #24 of their August 16, 2020 NOP Comment Letter. Please see Response to Comment 30-47.

Response to Comment Grp 30-21

The commenter asserts that the DEIR did not address adequate bonding for the project. However, the DEIR discusses bonding on pages 2-4, 3-47, 4.6-24 and 4.9-20. Please see Master Response 1 - Non-EIR/ Administrative.

Response to Comment Grp 30-22

The commenter asserts that concerns and issues raised in the commenters NOP comment were not addressed in the DEIR. However, as set forth in Responses to Comments Grp 30-1 through Grp 30-21, the DEIR does address the identified issues. Comment noted.

Response to Comment Grp 30-23

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

Response to Comment Grp 30-24

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Response to Comment Grp 30-2 above.

Response to Comment Grp 30-25

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. DEIR Impact 4.4-3 analyzed the project's potential impact to riparian habitat and concluded this impact was potentially significant but could be reduced to a less than significant level with mitigation. Four mitigation measures were identified including preparation of a management plan for work conducted adjacent to riparian areas and waters on both the Centennial and Brunswick Industrial sites. (See DEIR Impact 4.4-3.) A draft management plan was included as Appendix F.5 and F.8. Other related impacts related to Wolf Creek and South Wolf Creek were considered less than significant and mitigation was not proposed.

Please see Response to Comment Grp 30-2 regarding monitoring of water quality.

Response to Comment Grp 30-26

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Response to Comment Grp 30-3 regarding South Fork Wolf Creek being a perennial stream. As discussed in the comment above, DEIR Impact 4.4-3 requires the preparation of aquatic resources management plans that will mandate setbacks and other requirements to minimize impacts to Wolf Creek, South Fork Wolf Creek, and surrounding habitat. Draft management plans were included as Appendices F.5 and F.8. As discussed in DEIR section 3, the existing culvert transporting offsite flows under the Brunswick Industrial Site would be replaced and upgraded. The culvert would daylight at its existing location. The existence of the culvert is the baseline condition for the project and the restoration to an open creek as suggested by the commenter is not required.

Response to Comment Grp 30-27

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Responses to Comments Grp 30-25 and Grp 30-26 above. Regarding future agency permitting, DEIR Chapter 4.4 requires the applicant to received Corps section 404 permit and CDFW 1600 agreement prior to surface disturbance that would impact jurisdictional waters. Please see Master Response 3 – Operator Responsibility.

Response to Comment Grp 30-28

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. At this time, the applicant has not applied for CalFire timber harvest permits, but is required to do so prior to



harvesting of timber. As stated on page 4.2-20 of the DEIR, "With respect to harvesting the timber on the Centennial and Brunswick Industrial Sites, pursuant to Article 7 of the FPR, the Project Applicant will be required to prepare a THP and TCP application for submittal to CAL FIRE. A THP is similar to a CEQA document in that a THP includes an analysis of environmental impacts related to timber harvesting."

Response to Comment Grp 30-29

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The County will enforce conditions of approval and mitigation measures. Please see Master Response 3 – Operator Responsibility. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Grp 30-30

Please see Master Response 34 - Resident Fish. Please see Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge.

Response to Comment Grp 30-31

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The commenter states that previous applicant Emgold determined a better solution was to pipe water discharge to Wolf Creek rather than discharge to South Fork Wolf Creek. However, the 2008 DEIR for the Emgold project specifically examined the currently proposed discharge point at South Fork Wolf Creek (see Figure 4.7-4 of ESA 2008) and determined that the potential impact of this discharge with respect to inducing substantial erosion and downstream sedimentation and/or resulting in a violation of existing water quality standards is considered less than significant (see page 4.7-42 of ESA 2008). A pipeline and discharge to Wolf Creek was not proposed or analyzed in the 2008 DEIR.

Please see Response to Comment Grp 30-3 regarding analysis of alternatives.

References

ESA (Environmental Science Associates). (2008). *Draft Idaho-Maryland Mine Project Environmental Impact Report* San Francisco, California.

Response to Comment Grp 30-32

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. In addition, please see Response to Comment Grp 30-29 regarding enforcement of conditions of approval, mitigation measures, and agency permits.

Response to Comment Grp 30-33

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Underground exploration drilling creates small diameter holes which are irrelevant in comparison to the mining excavations which have been analyzed in the groundwater model for the DEIR. As stated on page 13 of Appendix M, the vibration or effects of drilling cannot be detected only feet away from the drill and no impact to the community would exist from these drilling activities.

Regarding groundwater impacts that may result from project dewatering, please see Chapter 4.8 of the DEIR, and Master Response 7 - Location of Future Mining, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring.

Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 30-34

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. DEIR Chapter 4.12, and the supporting traffic study (see Appendix O), analyzed twenty-four intersections and six roadway segments. As described and analyzed in DEIR Section 4.12.4, based on consultation with Nevada County and the City of Grass Valley, seven different scenarios were analyzed. The project does not propose to realign Centennial Drive and Spring Hill Drive and project-related traffic impacts were not identified that would require realignment of these roadways. However, the project would not preclude the realignment of the referenced roadways, if that was proposed at a later date.

Response to Comment Grp 30-35

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. No trail has been formally proposed by the City of Grass Valley or the County. The project site is private property and the property owner (the applicant) does not propose construction of a publicly accessible trail as part of the project. As a result, construction and use of a public trail was not analyzed in the DEIR.

Response to Comment Grp 30-36

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. DEIR Chapter 4.12 provided a description of existing bicycle facilities near the project site, cited or summarized existing County policies and plans regarding bicycle facilities, and analyzed the project's potential impact to these facilities. The impact analysis concluded the proposed project would not conflict with a program, plan, ordinance or policy addressing transit, bicycle, and pedestrian facilities, and impacts would be less than significant (see DEIR Impact 4.12-4).

Response to Comment Grp 30-37

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see DEIR Impact 4.8-2 and Master Response 15 - Adequacy of Groundwater Monitoring.

Response to Comment Grp 30-38

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Master Response 1 - Non-EIR/Administrative, and Master Response 2 - Social and Economic Impacts.

Response to Comment Grp 30-39

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Response to Comment Grp 30-5 regarding LUDC L-II 4.3.17 and Response to Comment Grp 30-3 regarding alternatives.

Response to Comment Grp 30-40

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The commenter generally questions the effectiveness of transplantation for Pine Hill flannelbush. As explained in Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prohibited and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) and the draft management plan provides alternative maintenance transplantation measure to help achieve success criteria.

Response to Comment Grp 30-41

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. Contrary to commenter's assertion, protocol level surveys are not required for CEQA.

Response to Comment Grp 30-42

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The commenter states that more precautionary measures are required in the event of storm events and extreme flood events to prevent overflow of untreated mine water to South Fork Wolf Creek. A Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR Section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows. West Yost's independent peer review concurs with this conclusion." (DEIR page 4.8-75)

As stated in Appendix K.5 of the DEIR, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall

be designed to convey the 10- and 100-year, 24-hour storm event. Section 4.5 of Appendix K.5 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from a 100-year storm event.

Please also see Appendix K.5 detailing Brunswick Industrial Site drainage and stormwater facility sizing, as well as Master Response 36 - Flows in South Fork Wolf Creek, and Response to Comment Agency 1-38.

Response to Comment Grp 30-43

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The project's greenhouse gas emissions and associated impacts and mitigation were analyzed in Chapter 4.3 of the DEIR. The commenter provides a list of various potential environmental changes that could occur at some future date because of climate change. As identified in CEQA Guidelines section 15125, the environmental analysis presented in the DEIR should compare physical environmental conditions as they exist at the time of the Notice of Preparation. The DEIR analyzed the projects potential impacts consistent with requirement in addition to reviewing potentially significant cumulative impacts based on known or planned development in the region. Hypothesizing on potential future impacts that may occur in the future because of climate change is speculative and not required by CEQA. Please also see Master Response 16 – Drought and Climate Change.

Response to Comment Grp 30-44

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see DEIR sections 4.3 and 4.8 analyzing the project's ammonium nitrate fuel oil use and impacts on air quality and hydrology. As discussed on page 4.8-48 of the DEIR, "The primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed water treatment plant is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation." The soluble nature of any blasting residuals will result in these constituents being removed from the mine by the dewatering system, such that they would not accumulate on the tailings or barren rock.

Please see Master Response 35 - Discharge to South Wolf Creek, explaining the water treatment process and elimination of potential contaminants in groundwater prior to discharge.

Response to Comment Grp 30-45

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

DEIR Impact 4.4-3 analyzed the projects potential to impact state or federally protected waters and wetlands and determined this impact was potentially significant. Surface disturbance on the Centennial Industrial Site has the potential to impact approximately 0.033-acre of ephemeral streams. Mitigation measures 4.4-3(a-d) were identified that reduce this impact to a less than significant level. Mitigation Measure 4.4-3(b) specifically requires the applicant prepare a watercourse/wetlands/riparian area management plan, a draft of which was included as Appendix



F.5 to the DEIR. The management plan includes best management practices and erosion control to prevent discharge to Wolf Creek. In addition, the project will be required to have a construction SWPPP that will outline similar measures to reduce erosion and sedimentation from project construction.

The DEIR has already analyzed the impact of waste rock piles to the environment and water quality, including pH and dissolved solids. Please see Chapter 4.8 of the DEIR and Master Response 8 - Mine Waste Characterization.

Please see Response to Comment Grp 30-43 regarding assessing of impacts resulting from climate change.

Response to Comment Grp 30-46

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Where impacts were identified, mitigation measures have been provided requiring additional agency permitting and surveys. These surveys will be conducted in the appropriate areas based on the potential for surface disturbance and by qualified professionals. Protocol level surveys are not required for the purposes of CEQA.

Response to Comment Grp 30-47

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. As stated in DEIR Impact 4.4-3, temporary or permanent impacts would not occur to Wolf Creek from the proposed project, but this potential temporary impact was included in the event that temporary encroachment within the Wolf Creek 100-foot non-disturbance buffer would be required as part of construction.

Response to Comment Grp 30-48

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. Please see Chapter 4.3 of the DEIR relating to fugitive dust emissions and related mitigation requirements. Please also see Response to Comment Grp 30-8 regarding monitoring and enforcement of conditions of approval, mitigation measures, and agency permits.

Please see Response to Comment Grp 30-45 regarding prevention of sedimentation from construction activities. In addition, the project would be required to implement a dust mitigation plan to reduce dust resulting from project construction activities. (See Mitigation Measure 4.3-2, and APM-AQ-2 Surface Dust Controls.)

Response to Comment Grp 30-49

This comment is a copy of an NOP comment letter previously sent by the commenter in 2020, and was considered by the County in connection with the preparation of the DEIR. The DEIR discusses bonding on pages 2-4, 3-47, 4.6-24 and 4.9-20. A final assurance cost estimate will be required annually pursuant to SMARA and the County Code that will estimate the cost of reclamation based on existing surface disturbance. Once concurrence with this estimate is received from the County and Department of Conservation, Division of Mine Reclamation, the application will be required to post a financial assurance mechanism (FAM) in the estimated amount.

Group Letter 31

From: Wolf Creek Community Alliance
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To: Members of the Nevada County Planning Commission,
Nevada County Board of Supervisors,
and Nevada County Planning Department Staff

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3/30/2022

Comments on the Idaho-Maryland Mine DEIR
Chapter 4.4 Biological Resources

Wolf Creek Community Alliance (WCCA) is pleased to submit comments on impacts to biological resources presented in the *Idaho-Maryland Mine draft Environmental Impact Report*.

Qualifications

Grp 31-1

Since 2004, WCCA has collected extensive stream and biological data in the Wolf Creek Watershed, including water quality, stream flow, benthic macroinvertebrate collection and analysis, and surveys of biological diversity. In collaboration with the City of Grass Valley and Nevada County, we regularly monitor and comment on development projects with regard to their impact on the Wolf Creek Watershed. Our team of scientists and protocol-trained citizen volunteers collaborates with our fellow stream monitoring organizations, Sierra Streams Institute and South Yuba River Citizens League, to calibrate instruments, share data, and refine best practices. We follow protocols that adhere to CA State Water Quality Control Board standards and comply with the Quality Assurance Project Plan (QAPP) version 1.5 of the Yuba Bear Monitoring Committee, of which we are a member. The Committee reports annually to the State Water Quality Control Board.

Grp 31-2

Background & Summary

1. Accurate **characterization of the environmental setting** (DEIR, chapter 4.4, section 4.4.2) and its biological resources is essential for predicting potential impacts to those resources. The DEIR omits, mistakes, mischaracterizes, and generally fails to fully consider the biological resources that would be impacted by this project. A lack of sufficient data is apparent regarding a number of potential impacts as well as a presentation of conclusions that cannot be justified, given the lack of that data. Without accurate characterization of both the environmental setting and its biological resources, significant or even unavoidable impacts may be missed. Specifically, the DEIR…

Grp 31-3
   a. Improperly separates and therefore does not consider the current baseline environmental setting of the Centennial site, including its wetlands, riparian habitats, and associated species.

Grp 31-4
   b. Gives an inaccurate hydrological assessment of the Brunswick site, ignoring the connectivity of the South Fork Wolf Creek (SFWC) upstream and downstream of the culvert on the Brunswick property, along with the movement of trout and other species upstream and downstream.

Grp 31-5
   c. Without sufficient examination or evidence considers the pond on the Brunswick site NOT to be an aquatic resource, disregarding impacts to its biological resources

Grp 31-6
   d. Through omission, lack of data, and lack of sufficient analysis, fails to adequately address potential impacts to the South Fork of Wolf Creek (SFWC) and the main stem of Wolf Creek due to mine water discharge, including
      i. The lack of hydrological or biological data in whole reaches of the SFWC
      ii. The lack of sufficient observation over time to create clear stream hydrographs
      iii. Inadequate study and characterization of the hydrological impacts of mine water discharge, including sedimentation, flow velocity, loss of seasonality, and loss of streambed or bank habitat
      iv. Omission of any qualitative observations and data regarding benthic macro-invertebrates (BMI)
      v. Inadequate consideration of chronic and cumulative impacts to BMI, trout and other aquatic species, including special concern amphibians, rather than simple tests of acute impacts.

Grp 31-7
   e. Includes mistaken and incomplete identifications of species
   f. Does not include or downplays the potential presence of special status species potentially impacted by the project

Grp 31-8
2. When **significant impacts** are identified (DEIR 4.4.4), their impacts need to be **mitigated** to the extent possible and the success and permanency of those mitigations need to be fully presented in order for the lead agency, the county, and its citizens, to be able to accurately and confidently assess the individual and overall impacts on the community. Further, the mitigations must be shown to sufficiently protect biological resources from significant harm. The mitigations presented in the DEIR omit important species of concern and sufficient mitigation for impacts to wetland and aquatic species.

The mitigation plans that are presented are in part inaccurate, vague, and generally to be detailed and approved AFTER approval of the project. Further, they are without sufficient oversight, mechanisms for stoppage, and penalty. They do not assure protection of biological resources in a manner that is measurable, monitorable, and adequate. Specifically, the DEIR mitigations…

Grp 31-9
a. Present a Pine Hill Flannelbush Management Plan without data indicating short and long-term success methods, particularly including the viability of transplanting, sufficient setbacks and management for biologically necessary propagation due to wildfire. (4.4-1)

Grp 31-10
b. Ignore and do not consider mitigation plans for species of special concern — Monarch Butterfly & Showy Milkweed (known to be present at the Centennial site), California Spotted Owl (reported as present in Empire Mine State Historical Park, which is adjacent to the Brunswick site), Yellow-breasted Chat and Willow Flycatcher (known to be present in the meadow/grassland reach of the SFWC downstream of the Brunswick site). (4.4-1) (4.4-2)

Grp 31-11
c. Do not consider potential impacts to biological resources of the Brunswick site pond (PD1). (4.4-2) (4.4-3) (4.4-4)

Grp 31-12
d. Do not consider adequate mitigation for potentially impacted aquatic species, including BMI and trout. Nor does it include analysis and mitigation for the movement of trout and other aquatic species both upstream and downstream of the industrialized portion of the Brunswick site. (4.2-2) (4.4-4)

Grp 31-13
e. Consider that habitat loss is an acceptable option if the species has not yet been observed, even if the likelihood of the species being present is high, including the destruction of nesting habitat for birds after the nesting bird has departed. (4.4-2)

Grp 31-14
f. Unreasonably suggest that a one-to-one replacement of wetland or monetary compensation is a preferred option for mitigating loss of wetland (4.4-3)

Grp 31-15
g. Allow disturbance within 100 foot setbacks from the SFWC, mischaracterizing the extent and degree of disturbance (4.4-3)

Grp 31-16
3. **Cumulative impacts** (DEIR chapter 4.4, section 4.4.4 Impacts and Mitigation Measures, Impact 4.4-6, pages 4-4-93 and following) that compound and accumulate both in terms of the interactions of discrete impacts, their impacts in the context of wider environmental settings and impacts over the length of the project are crucial in weighing the potential impacts of a project. This proposed project spreads out over a wide area, potentially impacting two watershed drainages, adjacent state park land, the full range of biological communities at this elevation in the foothills, and multiple neighborhoods of the wildland-urban interface that harbor significant habitat for biological resources. The matrix of these resources is not addressed in the DEIR, including the overall impacts on forest habitat, on species both aquatic and terrestrial, and on the headwaters of the Wolf Creek Watershed. Nor does the DEIR address changing impacts to these resources over the long 80 year period of the project, given the accelerating nature of climate change, with its various impacts that include drought, megafires, increased numbers of invasive species, and increased stress on species due to factors such as beetle infestation and fungal disease. Overall, in spite of its specificity, the DEIR does not

adequately address the cumulative potential impacts of this project, over space and time, to biological resources. Specifically, the DEIR…

Grp 31-17
a. Does not address the loss of forest land and associated stresses on forests as an essential factor of environmental health for the community (4.2-3)

Grp 31-18
b. Does not address potential cumulative impacts of impaired air quality on forests, nearby meadows, wetlands, and their associated species (4.3-1) (4.3-2)

Grp 31-19
c. Does not consider the loss of habitat an impact to special-status species, present or potentially present (4.4-1) (4.4-2) (4.4-6)

Grp 31-20
d. Considers the net loss of wetland within the Wolf Creek Headwaters area in which the project is proposed an acceptable mitigation, significantly reducing and unduly impacting the environmental resiliency of the associated local ecosystems. (4.4-3)

Grp 31-21
e. Does not adequately consider the cumulative impact of mine water discharge or failure of water treatment or water retention at the Brunswick site. (4.6-2) (4.8-3) (4.8-7)

Grp 31-22
f. Does not address environmental impacts of decreased groundwater in the the meadow/grassland reach of SFWC or other projected impact areas of the watershed. (4.8-2)

Grp 31-23
g. Does not consider the need to monitor existing mine seeps on the main stem of Wolf Creek in the event that mine dewatering impacts these seeps in ways that are not predicted.

Grp 31-24
h. Does not address the impact to overall development impacts for the community of changing the land use zoning designation from light industrial to heavy industrial/mining. (4.9-4)

Grp 31-25
i. Does not adequately address impacts of increased noise on species, habitats, and ecosystems. (4.10-1) (4.10-2) (4.10-3)

Grp 31-26
j. Does not fully address potential increases in risk of wildfire in an 80 year period that will see increasingly large and uncontrollable fire. (4.13-2) (4.13-5)

Grp 31-27
In Conclusion: Each of the issues listed above (and detailed below) must be addressed in this Draft Environmental Impact Report. If there were only 2 or 3 concerns, they could perhaps be addressed in a FEIR, but because of the sheer volume of omissions and insufficiencies in this chapter alone, a new DEIR must be prepared and recirculated for public and agency review.

Grp 31-28
Comments and Questions

4.4.2 Existing Environmental Setting

WCCA - DEIR Comments - 4.4 Biological Resources 4

Issue 1.a - Improperly separates and therefore does not consider the current baseline environmental setting of the Centennial site, including its wetlands, riparian habitats, and associated species.

At its outset, the DEIR unreasonably separates impacts to the baseline conditions of the Centennial site from the rest of the DEIR, and this continues in the chapter on Biological Impacts:

> *As discussed in Section 1.3, "Approach To Centennial Industrial Site Baseline," of this EIR, for the purposes of this biological resources analysis, the environmental baseline for the Centennial Industrial Site has been adjusted to be consistent with anticipated site conditions at the completion of the separate Centennial Industrial Site Clean-up Project. 4.4-2*

This avoidance in describing the current baseline of the Centennial site obstructs any agency or individual from considering the actual impacts of this proposed project. The "anticipated site conditions" are speculative, not established, particularly as at the date of these comments no approved RAP has been issued by the DTSC. Further, any separation of consideration of impacts into a voluntary RAP for a site that RiseGold clearly intends to use for the proposed project only obscures any question of cumulative impacts. We cannot evaluate biological impacts of this project when a significant part of those impacts are detailed in a document (the DTSC Centennial Site RAP) that is not even included in the DEIR or its appendices?

> *"...a limited amount of aquatic resources, the primary feature of which is Wolf Creek." 4.4-2*

The "limited amount of aquatic resources" omits the considerable amount of riparian and wetland resources currently existing at the Centennial site. Impacts to Wolf Creek here cannot adequately be assessed without considering the whole of the current hydrology of the site.

Similarly, at 4.4-3, the DEIR avoids consideration of vegetation communities for the Centennial site saying,

> *"The acreage of each vegetation community type at the Centennial Site is a good-faith estimate because it cannot be precisely established for the baseline condition given that the baseline has been adjusted…"*

How can the reader make assessments of completeness based on "good-faith" when trying to ascertain the true extent of vegetation communitie? This parceling out of biological resources and potential impacts on them in regard to the Centennial site occurs again and again throughout the DEIR and each time it obscures the true nature of both existing conditions regarding biological resources and the potential impacts upon them. The DEIR must include the considerations put forth in the RAP so that we can see in an integrated way all baseline

conditions and all potential impacts together. The same is true for cumulative impacts (as in Mitigation 4.4-6).

For example, again at 4.4-3 the DEIR identifies parts of the Centennial Site as "Graded/Remediation Areas," without describing the actual situation where contaminated soils in the current alternative proposed in the RAP would be capped with clean soil from the wetland and riparian areas of the site, areas not contaminated and not needing to be capped or removed. The DEIR goes on to say:

> *The areas identified for remediation within the RAP comprise approximately 28.25 acres, or roughly half of the Centennial Industrial Site. The excavation areas would be backfilled and regraded with clean fill…*

Reading this, the reader would not be aware that the "clean fill" to be used potentially could be taken from wetland and riparian areas on site, an action that might have clear alternatives. Yet, in this DEIR we are not allowed to consider the impacts or the alternatives. In fact, based on reading the DEIR alone, we would not even know about it. Again, how can this DEIR be considered accurate and complete when it purposely omits significant biological resources and impacts to them?

Finally, the DEIR excludes mention of most biological resources of the Centennial site while also briefly characterizing them, in a dismissive way that, without clear evidence, minimizes their biological value without giving the reader an opportunity to assess for themselves, on the basis of careful research and observation, the real import of these biological resources:

Grp 31-29

> *The wet meadows in the Centennial Industrial Site are typically created where extreme disturbance has occurred in the past or the presence of placer diggings. These wet meadows are characterized by bentgrass (Agrostis) and various rush (Juncus) species 4.4-6*

In this view the origins of the wet meadows in the Centennial site are summarized with unsubstantiated speculation, and the plant diversity is obscured by the mention of only two genera, while in fact these areas contain a much greater diversity of species, including two species of special concern - White Brodeaia and Showy Milkweed. Why does the DEIR include such incomplete, one-sided descriptions? The DEIR must be more thorough and balanced in these regards.

Grp 31-30

Issue 1.b - Gives an inaccurate hydrological assessment of the Brunswick site, ignoring the connectivity of the South Fork Wolf Creek (SFWC) upstream and downstream of the culvert on the Brunswick property, along with the movement of trout and other species upstream and downstream.

South Fork Wolf Creek (SFWC), a headwaters tributary of Wolf Creek has been studied, mapped, and assessed by Wolf Creek Community alliance since 2004. The Brunswick site that the DEIR undertakes to describe sits within the SFWC watershed, with the stream beginning above the Brunswick site and continuing below it. As the DEIR states:

> *The Brunswick Area is located in an area containing South Fork Wolf Creek, a perennial stream. Several intermittent and ephemeral streams connect directly to South Fork Wolf Creek within the Brunswick Industrial Site. South Fork Wolf Creek also flows to the south of the East Bennett Road ROW within the Brunswick Area. South Fork Wolf Creek contains associated riparian woodland and scrub and large tracts of wet meadow wetlands dominant in the northwestern section of the Brunswick Industrial Site.*

Yet the DEIR ignores the headwaters and continuity of the stream by stating the following:

> *South Fork Wolf Creek begins at a 48-inch culvert fed by surface drainage and road runoff from both the east and west sides of Brunswick Road, which crosses Brunswick Road through the culvert within the Brunswick Industrial Site. The culvert is located south of a large manmade clay-lined pond and flows northwest across the Brunswick Area. The 48-inch diameter culvert is approximately 1,600 feet long (Regional Water Quality Control Board [RWQCB] Order No. 88-185, December 18th, 1990). Additionally, perennial surface drainage from the west side of Brunswick Road drains north to the 48-inch culvert inlet. 4.4-2 & 3*

The South Fork of Wolf Creek (SFWC) is a drainage that has been documented from the earliest days of the city of Grass Valley. Nisenan established a village, Yolosyan, along its banks,[1] and the city of Grass Valley itself was named after the meadow/grassland that still exists and is part of Reach D of the SFWC (as identified in Appendix K.1).[2] USGS maps from the 1870s onward show a perennial stream beginning at least as far as Brunswick Road which forms its southern tributary source, and from the Loma Rica Ridge, which forms its northern tributary source. Wolf Creek Community Alliance, in its monitoring of the SFWC has made observations and collected data at a number of publicly-accessible sites on the stream, including a monitoring site upstream of the "48-inch culvert," on the east side of Brunswick Road (WCCA, site 6.1), and another downstream on a section of the South Fork the DEIR characterizes as Reach C (WCCA, site 6).[3] The South Fork Wolf Creek begins not below the culvert, but above it and, indeed, on the other side of Brunswick Road, upstream of WCCA site 6.1 at Wood Rose Way. At that location, which has been monitored for a number of years, we observe a perennial flow of water.[4] The DEIR itself observes perennial flow both above the

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[1] WCCA, City of Grass Valley kiosk project, Nisenan geography contributions by Shelly Covert, 2014.
[2] Appendix K.1,
[3] DEIR 4.8-24 and following; WCCA, Wolf Creek Watershed Map showing monitoring sites, https://www.arcgis.com/apps/Embed/index.html?webmap=aee3c0af93a245efb1a8c503182d66b5&extent=-121.2014,39.0785,-120.8721,39.2916
[4] WCCA, Wolf Creek Water-Quality Monitoring Data Analysis, 2013, page 70, https://www.wolfcreekalliance.org/documents/MonitoringDataSummaryFinal.pdf; WCCA, Wolf Creek

culvert near Brunswick Road, entering the culvert and exiting it below. As there is continuous, perennial flow from a point near Brunswick Road to the point where water exits from the culvert into what the DEIR calls South Fork Wolf Creek, it is accurate to consider the perennial flow of water one, continuous creek. The DEIR, however, mischaracterizes the origins and extent of the South Fork by stating that "South Fork Wolf Creek begins at a 48-inch culvert" and that it is "fed by surface drainage and road runoff from both the east and west sides of Brunswick Road, which crosses Brunswick Road through the culvert within the Brunswick Industrial Site." In fact, the "drainage" going through "the culvert within the Brunswick Industrial Site" is the South Fork of Wolf Creek. Just as downstream of the proposed project the creek flows into the box culvert at Ophir Street in Grass Valley and disappears underground only to reappear downstream of the Safeway Parking lot in Grass Valley, having joined with the main stem of Wolf Creek to be a continuous part of one hydrologically active and perennial stream and not some disjointed, human-created "drainage", so too we must treat the flow going through the "industrial culvert" on the Brunswick site as part of the South Fork. To do otherwise is to unreasonably disconnect the free-flowing connected aquatic habitat and to mis-characterize potential biological impacts by excluding that portion of the creek from consideration as part of the environmental setting. The DEIR must not exclude a portion of the SFWC from consideration as a biological feature when it is connected to perennial flow both upstream and down. How can this section of creek be disregarded and not analyzed for impacts when aquatic species including trout have been observed both above and below the culvert? At least one map in the DEIR shows SFWC as continuous:



DEIR, Appendix K.1, page 10

The Brunswick site shows a 100 ft building setback and an NID spill easement on an open creek, South Fork Wolf Creek. The map is dated 1987. Apparently this perennial stream was buried in a culvert after 1987, based upon the map's date. Was the burial of SFWC done under an authorized permit? What is the status of the NID spill easement? Have the 100 ft setback and NID spill easement been waived or reconveyed to the land owner? Any existing easements or setbacks which may be encroached by the Project must be waived or modified by the consent of the entitled party.

Watershed Disturbance Inventory and Assessment of Conditions, part 1, 2017; https://www.wolfcreekalliance.org/documents/WolfCreekDisturbanceInventory4.13.18.pdf

In other maps, however, and in text, SFWC is not considered as a continuous stream for its whole length. This is a serious inaccuracy that needs to be rectified in the DEIR.

Further, it must be noted that the DEIR, particularly in Appendix K.1 mischaracterizes the furthest upstream portions of SFWC, which are its headwaters, instead to be NID "spillway channels."[5] Though it is true that NID ditches are situated on the ridges above both tributaries and that there is some seepage, overflow, and occasional release events on the part of NID into those tributaries, neither drainage was created by NID for spillage. The watershed topography clearly shows stream channels and folds in the typography that were created by the natural stream flow in these tributaries over thousands of years. The 'Loma Rica' tributary, shown as a perennial stream in many early USGS maps, indeed could use further study as it may not flow perennially in drought periods or for other reasons. Nonetheless, WCCA has observed free flow on the tributary ABOVE and below the point where it crosses the NID ditch. It is not simply a spillway for NID. The case against the other tributary that parallels Wood Rose Lane on the east side of Brunswick Road being a non-biological "spillway" is also strong. It flows perennially from two sources (parallel to Wood Rose and roughly parallel to Brunswick Road). The natural topography confirms that it has been part of the headwaters of the South Fork for thousands of years. Small ponds created on residential properties have doubtless impacted stream flow and some seepage from an NID ditch has been observed at the top of the Wood Rose drainage, but neither it or the 'Brunswick' stream flow WCCA has monitored at the corner of Brunswick and Wood Rose can be explained solely by excess NID ditch water. In any case, for the DEIR to summarily mischaracterize the headwaters of the SFWC as "spillway", and its continuation through the Brunswick site as culvert separate from any stream stands in the face of evidence to the contrary and is supported only by generalized, summary observation and no clear data. How can the DEIR consider the SFWC to begin below the culvert when there is perennial flow all the way from the other side of Brunswick Road? The DEIR must make a more careful study of the sources of the SFWC, its perennial flow and connectivity above and below the culvert. A full assessment of the impacts to biological resources cannot be made when portions of streams with perennial flow are excluded from consideration.

Issue 1.c - Without sufficient examination or evidence considers the pond on the Brunswick site (PD1) NOT to be an aquatic resource, disregarding impacts to its biological resources

Grp 31-31

The large pond on the Brunswick site should be considered as an aquatic resource. Not to do so is to ignore potential impacts on its biological resources. Yet the DEIR claims:

> *A man-made clay lined pond (PD-1) associated with previous saw milling operations does not have a direct outlet or connection to the South Fork Wolf Creek. PD-1 receives its water mainly from surface runoff and precipitation. PD-1 was used previously as a recycling pond for site runoff containment and log watering during mill operations. PD-1*

[5] DEIR, Appendix K.1, 10

> *is non-jurisdictional pursuant to federal Clean Water Act (CWA) regulations given it receives water from sheet flow within the Brunswick Industrial Site and does not connect directly or indirectly with South Fork Wolf Creek or any other "waters of the U.S."* [5] *4.4-15*

The use of the word "mainly" in the above citation is an admission by the DEIR that at least some of the pond water is received from other sources, likely springs, other underground seepages, and even SFWC itself. Reviewing the Brunswick Industrial Site and E. Bennett Road ROW Aquatic Resources Delineation, Appendix F.7, the background to this questionable delineation is also given, again without qualitative data or sufficient observation. As background, it includes a regulatory overview that states:

> *"Waters of the U.S." include wetlands and lakes, rivers, streams, and their tributaries. Wetlands are defined for regulatory purposes as areas "...inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated solid conditions..."*[6]

The report goes on to state that recent court cases rule out certain "isolated" wetlands, but

> *does not prevent CWA jurisdiction if a "significant nexus" such as a hydrologic connection exists, whether it be man-made (e.g., roadside ditch) or natural tributary to navigable waters, or direct seepage from the wetland to the navigable water, a surface or underground hydraulic connection, an ecological connection (e.g., the same bird, mammal, and fish populations are supported by both the wetland and the navigable water)...*

So why does the DEIR choose to exclude the Brunswick Pond? Because it is an "isolated" pond and only "contains water in direct response to rainfall (e.g.) ephemeral features."[7] As Appendix F.7 claims, the pond

> *receives its water mainly from surface runoff and precipitation. PD-1 is a man-made pond used historically as a recycling pond for site runoff containment and log watering during mill operations.*
>
> *PD-1 is non-jurisdictional per federal CWA regulations given it receives water from sheet flow within the Brunswick Industrial Site and does not connect directly or indirectly with South Fork Wolf Creek or any other "waters of the U.S." and therefore, it does not receive water from or connect to a "waters of the U.S."*
>
> *However, upon regulatory agency review, PD-1 may be determined to be regulated as a "Waters of the State of California."*[8]

[5] DEIR, Appendix F.7, page 2.1
[6] DEIR, Appendix F.7, 2.2
[7] DEIR, Appendix F.7, 4.3

On this basis the main text of the DEIR also excludes the pond for consideration both in terms of being an aquatic resource and in regard to its biological resources.

This is so in spite of the fact that it potentially should be regulated as a "Waters of the State of California." This consideration must also be included in the conclusions of the DEIR.

Beyond this, the lack of solid qualitative evidence in the DEIR and the existence in the DEIR of several suggestions that there ARE connections between the pond and the SFWC and that a "significant nexus" does exist, together indicate that the DEIR's analysis and conclusions are incomplete.

First of all, field observations are vague and do not in any way quantify water, either runoff into the pond or seepage/groundwater flow from the pond. As the Brunswick ARD itself states:

> *field surveys in December 2018, July 2019, and August 2019 followed very little seasonal rain events and therefore, direct observation of hydrology in some areas of the Brunswick Area was not possible.*[9]

Why weren't field studies done during periods during or after seasonal rains? Conclusions about the hydrology of the pond are invalid without "direct observation" and real data.

Second, though observation and data is incomplete, the DEIR nonetheless makes definitive judgements not warranted by the analysis. If pond recharge is "mainly," but not wholly from runoff and if the pond "may" be determined as "waters of the State of California" why hasn't that been considered and included in the conclusions of the DEIR?

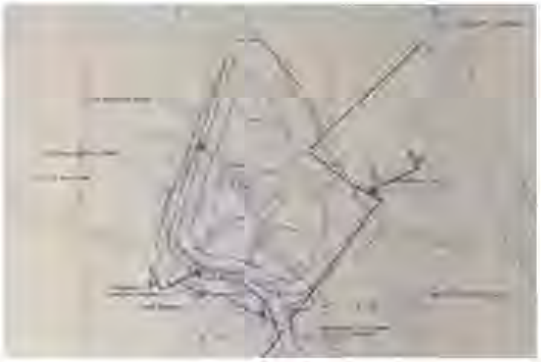
Third, there are actually suggestions in Appendix H.1 and studies appended to it, that there is a "significant nexus" between the pond and "waters of the US" including South Fork Wolf Creek and wetlands immediately downstream.

The Geotechnical Engineering Project for the Brunswick Industrial Site, Appendix H.1, referring to the report from Vector Engineering states that:

> *Groundwater monitoring revealed that groundwater movement appeared to be in a west to southwesterly direction, flowing towards the South Fork of Wolf Creek drainage. Findings included that "any seepage that may occur through the clay liner could potentially flow through the previous coarse mine tailings (and sawdust) located beneath the west (and southwest) side of the pond."*[10]

[9] DEIR, Appendix F.7, 3.5
[10] DEIR, Appendix H.1, page 10

The study goes on to state that "the cross-section from the same study indicates that the groundwater flow observed was over bedrock,"[11] and that "the existing culvert which diverts the South Fork of Wolf Creek crosses underneath the pond...[12] Another suggestion of water connectivity is its map of the pond showing an "emergency overflow spillway" into SFWC.[13]



Finally, it concludes, much as the Brunswick ARC does

> *that seasonal variations in the groundwater levels may occur across the site.*[14]

The other report appended to H.1 by Holdrege & Kull also gives suggestions of a potentially significant nexus:

> *Vegetation around the dam consisted of alders, willows, and riparian grasses and shrubs...We observed riparian plants and trees in the meadow downstream of the earthen dam. We observed erosion in a relatively dry stream bed near the downstream side of the southern section of the dam. More significant erosion was evident downstream of the corrugated metal pipe (CMP) culvert under the dam.*

As shown in the accompanying map.[15]

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[11] DEIR, Appendix H.1, page 106
[12] DEIR, Appendix H.1, page 94
[13] A detail of the map is attached. The full map is available at DEIR, Appendix H.1, page 112.
[14] DEIR, Appendix H.1, page 96
[15] DEIR, Appendix H.1, pages 139 & 146.



Fourth, the topography and geomorphological history of the Brunswick site itself suggests a significant hydrological connection with South Fork Wolf Creek. Given that the pond is located directly in the bottom of the drainage topography of the valley created by South Fork Wolf Creek, that the pond is immediately next to the perennial flow of South Fork Wolf Creek, and that it is immediately upstream of identified wetlands, the DEIR should carefully determine whether the pond is connected to other aquatic features. Why hasn't the DEIR done this? In this regard it is wholly negligent, both in terms of insufficient data collected and unwarranted conclusions made. The omission is significant. As the report from Holdrege & Kull indicates, the pond is a significant biological resource, with abundant riparian species surrounding it, including alder, willow, and riparian grasses. Aerial and field photos show this clearly.[16]

Grp 31-32

The pond itself is known to be a significant habitat for waterfowl and migratory birds, including breeding Wood ducks[17] It may also be a significant habitat for BMI, amphibians, including Western Pond Turtle, a species of special concern, and fish. This needs to be studied instead of ignored if the DEIR is to complete an adequate analysis of impacts to biological resources. Why has the field work to ascertain biological resources of the pond not been completed? In summary, the environmental setting regarding the pond is inaccurate and must be rewritten. Because of the evidence cited above, it is clear that the pond IS jurisdictional, and must be afforded all the environmental protections afforded to waters of the US. It is a vibrant, vital, interconnected part of the headwaters of South Fork Wolf Creek.

[16] DEIR, Appendix F.7,
[17] Personal communication, Steve & Diane Rose, Sierra Foothills Audubon, 2021

Issue 1.d - Through omission, lack of data, and lack of sufficient analysis, fails to adequately address potential impacts to the South Fork of Wolf Creek (SFWC) and the main stem of Wolf Creek due to mine water discharge

Notably, chapter 4.4 of the DEIR does not analyze or mention biological resources downstream of the Brunswick site. This is negligent, given the potential impacts of initial and maintenance mine dewatering which would cause significant mine water discharge into South Fork Wolf Creek. The analysis and conclusions for this omission are provided in chapter 4.8 Hydrology and Water Quality, one of its appendices, K.1 Geomorphic Assessment of South Fork Wolf Creek. A final appendix to the Biological Resources chapter of the DEIR, F.10 SF Wolf Creek Technical Memo. Appendix F.10, attempts to rectify the absence of biological resource assessment due to downstream mine water discharges. It fails to be comprehensive and complete, however. Also, its conclusions are based on the faulty assumptions and conclusions of the two hydrological reports - 4.8 and K.1. Following is a summary of the issues highlighting the inadequacy of the DEIR in this regard.

I. The lack of hydrological or biological data in whole reaches of the SFWC

Grp 31-33

The DEIR identifies 6 reaches (A through F) of the South Fork Wolf Creek, the first two of which are within the Brunswick site.

Figure 4.8-9
South Fork Wolf Creek Reaches in Project Vicinity



DEIR, 4.8, page 4.8-25

However, Reach C, where WCCA has established a monitoring location since 2004 is only summarily analyzed for its hydrology, without a single collection of qualitative data provided. There is no stream flow data, no erosion testing, no stream velocity profiles provided. This is a crucial omission as data from WCCA and Sierra Streams Institute shows that the center of this reach, within the State Park section shown with dotted lines on the map, consistently exhibits the highest diversity and richness of benthic macroinvertebrates (BMI) in the whole Wolf Creek

Watershed.[18] Why wasn't this stream reach surveyed with a collection of qualitative data? How can we accurately assess impacts to aquatic ecosystems downstream of the proposed project if we are lacking key data about this reach of the stream?

Grp 31-34

Similarly, Reach D, also part of the State Park, and identified as a key biological and ecological resource for the park and the county, is completely neglected in the Technical Memo (Appendix F.10) which attempts to summarize biological resources for the South Fork Wolf Creek as a whole. There are no photos, no observations of stream features, vegetation communities or individual species. Yet, the State Park has expended significant resources into documenting the biological richness of this meadow/grassland reach of SFWC, including a 5-year study documenting wetland resources and ongoing restoration. Included are observations of the rare Sidalcea gigantea(CNPS Inventory of Rare and Endangered Plants, 4.3) in the riparian area of SFWC.[19] Why isn't this species included in the survey of biological resources? The richness and diversity of species present along Reach D is also made clear through the work of Gold Country Avian Studies, which has been conducting weekly bird banding at the meadow and along the creek for more than 4 years.[20] So we must ask again, why wasn't this stream reach surveyed for biological resources? How can biological resource assessment be considered adequate and complete without qualitative data from this stream reach? The DEIR must be considered inadequate until these issues are fully addressed.

II. The lack of sufficient observation over time to create clear stream hydrographs

Grp 31-35

The qualitative stream data that is included is limited and questionable in terms of resolving key questions about increased streamflow impacting biological resources. EMKO measured flow only on two occasions- in April and August of 2019 - along points of the Loma Rica headwaters tributary of South Fork Wolf Creek (simply labeled variously as a 'natural creek' or an 'NID spillway'). Data from NID meant to corroborate conclusions about flow in this tributary is gathered only from 2018.[21] How can an adequate characterization of the hydrology of this important headwaters be ascertained from two data points during one water year, along with three data points during a period of only two months from a different water year?

Grp 31-36

Similarly, the data collected by Balance Hydrologics on the main stem of South Fork Wolf Creek is also limited and insufficient. Only two locations are considered, one just downstream of the Loma Rica Ridge headwaters tributary ("the natural creek"), which is proposed to be the mine water discharge site, the other downstream at Ophir Street, just as the South Fork enters the box culvert.[22] In between these two sites are significant reaches of the South Fork that would

[18] WCCA, Wolf Creek Watershed Disturbance Inventory and Assessment Of Conditions, part II, 2021, page 27, https://www.wolfcreekalliance.org/documents/Wolf_Creek_Watershed_Disturbance_Inventory.pdf
[19] Dan Lubin, CA State Parks, Fifth Annual Magenta Drain Mitigation and Monitoring Report, EMSHP, 2019, page 5
[20] Gold Country Avian Studies, www.facebook.com/goldcountrybirds/
[21] DEIR, 4.8-4
[22] DEIR, 4.8-4

need to be assessed, given the diverse character of the stream along these reaches and the important biological resources present in different abundance along the creek.[23]

Equally lacking is sufficient study over time, Balance collected data only in September of 2019 and in January of 2020. The more continuous measurements from 2020 to 2021, again, are only from one location, and in itself cannot be used to create an accurate hydrograph for the whole creek.[24]

III. Inadequate study and characterization of the hydrological impacts of mine water discharge, including stream flow, sedimentation, stream velocity profiles, loss of seasonality, and loss of streambed or bank habitat

Finally, the data collected fails to adequately assess potential for sediment load and fails to create stream velocity profiles. Potential loss of seasonality of flow is not considered, nor is stream bank habitat loss due to increased stream depth. Analysis of sediment loading in the stream is crucial. The observations presented by Balance, again, are based only on a single test in a single portion of the South Fork. That the DEIR uses this single data point as the basis of significant claims about the lack of potential for sedimentation caused by mine water discharge is a problem. The conclusions presented in the DEIR simply cannot be justified by this single data point. Apart from stream flow, other analysis should have been undertaken in order to assess impacts on the South Fork. It is a living stream, with a vibrant aquatic ecosystem along much of its length. Stream velocity profiles, crucial for measuring impacts on benthic macroinvertebrates and fish, should have been completed. Calculations showing potential changes in the seasonal hydrograph of the stream should have been produced. Measurements and conclusions regarding increased stream depth along with reduced stream bank or cobble habitat at various points along the stream should have been made. These studies must be included in the DEIR.

Grp 31-37

Stream flow in the Sierra Nevada foothills is increasingly variable, from month to month and from year to year. Small-volume streams such as the South Fork Wolf Creek undergo significant change that varies over time, according to the occurrence of drought or above-average precipitation, and varies greatly in different reaches. Aquatic and terrestrial ecosystems are greatly dependent on this mosaic of changes, over time and space. The data presented in the DEIR is not sufficient to adequately characterize this variability. Without that data, we cannot adequately measure potential impacts to the stream.[25]

IV. Inadequate study of biological resources

Grp 31-38

[23] DEIR, Appendix K.1, page 21 and following, Appendix F.10
[24] DEIR, Appendix K.1, page 26 and following
[25] Dave Herbst, Life of the Bottom-Feeders in the Shallow and Deeps of Streams, Sierra Stream Institute, Science Presentation, 3/1/2022, https://sierrastreamsinstitute.org/2022/02/21/virtual-science-speaker-series-talk/

If impacts of this project are to be adequately assessed, a careful and complete survey of biological resources of SFWC, the body of water potentially impacted by mine water discharge, needs to be included. This is simply not the case. The technical memo is clearly not a full assessment of biological resources for the creek. It completely excludes any consideration of a significant stream reach (D), currently projected as part of the state park. It is primarily a one-time survey for Yellow-legged Frog and only summarily considers other biological resources within that context. For example, it notes "fish"..."most probably small rainbow trout" in the stream without further investigation. In this instance and many others, it does not include qualitative observations sufficient to fully analyze the existence of biological resources and their habitats.[26] This lack of precision and paucity of observation occurs in other biological surveys included as part of the DEIR as well, for example, where in the Brunswick BRA it is stated that "surveys did not record any observations of deer."[27] They were not observed because no adequate study was made to verify their presence, for example through placement and monitoring of a trail camera.[28] In general, biological assessments in the DEIR attempt the minimum and doing so fail to assess the full extent of biological resources potentially impacted. Without such a detailed survey of biological resources, how can this DEIR be considered complete?

V. Omission of any qualitative observations and data regarding benthic macro-invertebrates (BMI)

Grp 31-39

A crux of the matter is that the DEIR as a whole, in the chapter on Biological Resources (4.4) or in the various appendices do not offer any data regarding benthic macroinvertebrates (BMI). BMI indexing is a standard protocol for assessing stream ecology health and It is impossible to judge impacts to stream health without adequate baseline data and repeated collection of data. BMI populations exist as a crucial foundation for the whole ecological food pyramid that includes fish, crustaceans, amphibians, fish, and birds.[29]As the stream ecologist David Herbst recently observed, through mine water discharge BMI can be subjected to habitat alteration, increased sediment load, toxins in the water, and chronic stress due to continuous increases in stream flow.[30] Without a baseline measurement of BMI communities in various reaches of the South Fork Wolf Creek, over time and to the genus or species level, we cannot consider any future impacts to those aquatic communities. Why does the DEIR not include BMI observations and measurements? The DEIR cannot be considered complete without data on BMI.

[26] DEIR, Appendix F.10-6
[27] DEIR, Appendix F.5-13
[28] See the trail camera recordings of Mike Shea that document not only deer, but skunk, fox, bobcat, raccoon, black bear, and mountain lion, all species that are not discussed in the DEIR when it considers biological resources. Mike Shea, Native Wildlife on the Brunswick Mine Site, www.minewatchnc.org/post/mike-shea-too-good-to-be-true
[29] J B Wallace, J R Webster, The role of macroinvertebrates in stream ecosystem function, 1996, https://pubmed.ncbi.nlm.nih.gov/15012327/
[30] Dave Herbst, Life of the Bottom-Feeders in the Shallow and Deeps of Streams, Sierra Stream Institute, Science Presentation, 3/1/2022, https://sierrastreamsinstitute.org/2022/02/21/virtual-science-speaker-series-talk/

VI. Inadequate consideration of chronic and cumulative impacts to BMI, trout and other aquatic species, including special concern amphibians, rather than simple tests of acute impacts.

Related to the lack of BMI data is a basic misunderstanding of stream health regarding aquatic organisms. The DEIR, in its appendix K.2 Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine, when considering water quality for the project, tests water quality from the New Brunswick Mine Shaft by using an acute toxicity test for rainbow trout. On this basis the DEIR gives no further consideration to the impacts of mine water discharge into SFWC.[31] Yet, there is not enough data to confirm that the limited test using water from one source location in the mine is representative of the chemical composition of water that would be discharged from the mine. Nor is such an acute toxicity test useful in assessing the overall impacts to trout and other aquatic organisms, as higher levels of heavy metals or high levels of Specific Conductance (EC), which tested above healthy levels for benthic macroinvertebrates, can have significant chronic effects.[32] A much more logical place to collect representative contaminated water from the mine tunnels would be the current outfall locations, currently flowing unimpeded into Wolf Creek near Centennial Drive.

Grp 31-40

Overall, the data provided to construct an adequate and reliable baseline for considering potential impacts to the South Fork Wolf Creek is wholly insufficient. Further data is needed, both to better assess the range in chemical composition of mine water discharge, the remaining impacts to sensitive aquatic organisms even after proposed levels of water treatment, and careful testing for the impacts of potential chronic stress to organisms. Mine dewatering impacts to biological resources downstream is well documented.[33] Why does the DEIR include so little data in this crucial area of potential impact? How can the DEIR purport to identify and mitigate impacts to this project if it does not fully address the complexity of mine discharge impacts downstream?

Issue 1.e - Includes mistaken and incomplete identifications of species

Grp 31-41

In addition to the issues mentioned above, the description of vegetation communities includes mistakes in identification, typographical errors, and incomplete identifications. Some of these mistakes are glaring or could easily be fixed and suggest a lack of precision and care in the description. For example, at 4.4-9 the DEIR suggests that the

> Montane riparian…are characterized by black cottonwood (Populus tremuloides)…

[31] DEIR, Appendix K.2-41
[32] DEIR Appendix K.2, 40-46; Dave Herbst, Sierra Stram Institute, personal communication, February, 2022
[33] Clements, W.H., D.B. Herbst, M.I. Hornberger, C.A. Mebane, and T.M. Short. 2021. Long-term monitoring reveals convergent patterns of recovery from mining contamination across 4 western US watersheds. Freshwater Science 40:407-426

This is a confusion in identification in describing the site apparent even without field-checking the property. Referring to the Jepson Manual,[34] the authoritative source for California plant identification, one finds that the common name, 'black cottonwood,' has the scientific name *Populus trichocarpa* NOT *Populus tremuloides* and that it natively grows in this region only at higher elevations, for example at over 5,500 feet at Cisco Grove along Hwy 80.[35] Or if we consider that perhaps the observation refers to the scientific name, *Populus tremuloides*, we find that this refers to Quaking Aspen, another higher elevation deciduous tree for which no herbarium records exist in the area below 1524m (5,000 feet).[36] In short the identification appears to be confused and dramatically inaccurate.

Other problems relate to incomplete identifications, such as at 4.4-10 where the text refers to

> "California Black Oak, Pine, and Douglas Fir"

Without identifying the specific species of pine.

Finally, some of the generalizations of vegetation communities characterize them as wholly consisting of invasive or non-native plants when a careful review of the botanical survey for the site indicates an actual majority of species as native.[37] This generalization misrepresents the character of the vegetation community and does not allow the reader to accurately comprehend the degree of biological resources that might be impacted.

What is the actual species of tree being referred to at 4.4-9 if it is not 'black cottonwood?' What species of 'pine' is meant at 4.4-10? Why is the abundance of native plants not mentioned at 4.4-...? These questions suggest that a comprehensive review of species identifications and vegetation community descriptions must be undertaken. Otherwise, how can we have confidence that the DEIR in this regard is complete and accurate?

Issue 1.f - Does not include or downplays the potential presence of special status species potentially impacted by the project

Grp 31-42

Finally, in regard to environmental setting, the DEIR should include analysis of the following species of concern that are not included in its text:

The California Spotted Owl (Strix occidentalis occidentalis) is listed as a California Species of Special Concern, a sensitive species by the USFS, and is under review as an endangered species by the US Fish and Wildlife Service.[38] A pair has been observed within Empire Mine

[34] Jepson eFlora, Populus trichocarpa, https://ucjeps.berkeley.edu/eflora/eflora_display.php?tid=39463
[35] Trees and Shrubs of Nevada and Placer Counties, Redbud Chapter, California Native Plant Society, 2014, page 392.
[36] Jepson eFlora, Populus tremuloides, https://ucjeps.berkeley.edu/eflora/eflora_display.php?tid=39509
[37] Appendix F.6, Centennial Botanical Report, Appendix A
[38] California Fish and Wildlife Service, https://fws.gov/sacramento/es_species/Accounts/Birds/ca_spotted_owl/

State Historical Park, adjacent to the Brunswick site, and in other locations within a 5 mile radius of the proposed sites.[39] Suitable mature forest habitat is present in parts of the Brunswick property, in forest close to proposed Brunswick site mine operations and downstream within the South Fork Wolf Creek watershed. As such the DEIR should complete a protocol-level survey of suitable habitat and include that in the DEIR. Why has this species been omitted from consideration when observations indicate a reasonable probability that the species may be present at or adjacent to the Brunswick site?

Grp 31-43

The Yellow-breasted Chat (Icteria virens) is also listed as a California Species of Special Concern.[40] It has been observed during breeding season along reach D (as identified in the DEIR) of the South Fork Wolf Creek. It also should be assessed for likely habitat on the proposed sites and along Reach D of South Fork Wolf Creek, an area being assessed for biological resources as part of the DEIR.

Grp 31-44

Willow Flycatcher (Empidonax traillii), a species the state considers critically iimperiled (S1/S2) has also been observed along Reach D.[41] Probable habitat should be identified and analysis of potential impacts to that habitat due to mine dewatering, particularly in regard to riparian willow stands, and other impacts due to proximity to mine operations.

Grp 31-45

The US Fish and Wildlife Service has determined that listing of the Monarch Butterfly (Danaus plexippus plexippus) as "endangered or threatened under the Endangered Species Act is warranted" and is now under yearly review as a candidate for inclusion under the Endangered Species Act.[42] This is particularly the case with the Western Monarch Population, which relies on migration and breeding habitat throughout the Sierra Nevada Foothills. In support of this, the California Department of Fish & Wildlife has included the Monarch Butterfly in its Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan. A Western Monarch Conservation Plan, adopted in 2019, was also created to protect and assist in the recovery of western monarch populations.[43] Essential to recovery efforts, according to the Conservation Plan,[44] is preservation of breeding habitat, primarily species of milkweed (Asclepias). The Centennial site as described in this DEIR has a population of showy milkweed (Asclepias speciosa) existing in riparian and wetland (FAC) habitats.[45] Therefore, special consideration of the existence and

[39] Empire Mine Historic State Park, Site Characterization and Remediation Draft Program EIR, Biological Resources, 2009, 4.3-28; https://www.parks.ca.gov/pages/980/files/4.3%20biological%20resources%20v56.pdf
[40] California Department of Fish and Wildlife, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=10428&inline
[41] As recorded in the January 2022 CNDDB Special Animals list, nrn.dfg.ca.gov
[42] U.S. Fish & Wildlife Service, https://www.fws.gov/savethemonarch/SSA.html
[43] California Department of Fish and Wildlife, https://wildlife.ca.gov/Conservation/Invertebrates/Monarch-Butterfly
[44] Western Monarch Conservation Plan, 2019, https://wafwa.org/wpdm-package/western-monarch-butterfly-conservation-plan-2019-2069/?wpdmdl=13048&refresh=621bdc39668f91645993017&ind=1602171186650&filename=WAFWA_Monarch_Conservation_Plan.pdf
[45] DEIR, Appendix F.6, Appendix A, Vascular Plants Occurring in the Centennial Industrial Site, page 1

preservation of these milkweed populations needs to be included in the DEIR. A protocol-level survey of individuals needs to be included as well as seasonally-timed surveys for monarch butterflies, in adult, larval, or pupae stages. How can we be assured that impacts of this proposed project will not include detrimental actions reducing monarch butterfly populations if a complete survey of milkweed and monarch butterfly populations on site is not included in the DEIR?

The DEIR also downplays the potential presence and need to mitigate for the following species of concern:

Stebbins morning glory (CNPS List 1B.1) — surveys were completed outside its blooming period, nor have surveys been done after the recent fire that burned portions of the Centennial site in 2021. Habitat at the Centennial site itself indicates a reasonably high probability of presence.[46]

Chaparral sedge (CNPS List 1B.2) — surveys for this species were also done outside of its blooming period and the habitat again suggests a high probability of presence.[47]

Grp 31-46

Finger rush (Juncus digitatus, CNPS List 1B.1) — though the species is considered to have a low probability of occurrence by the DEIR, the species is known less than one mile from the sites, and surveys for the species were not done during its blooming season.[48]

Sierra brodiaea (Brodiaea sierra, CNPS List 4.3) — As the DEIR states, "thousands of individuals covering almost a quarter of the Centennial Industrial Site"[49] were mapped in surveys. Although the DEIR obscures the potential impact to this species, by referring impacts to DTSC's proposed and not-yet-completed RAP, it is likely that a significant population of this species would be extirpated or seriously impacted.

Grp 31-47

Foothill Yellow-legged Frog (Rana Boylii) and Red-legged Frog (Rana aurora draytonii) — visual surveys were not done during prime breeding conditions, given the absence of recent rain. Nor is there an indication that surveys were done at night, when observation of these frogs is optimal.[50]

Grp 31-48

Western Pond Turtle (Emys marmorata) — though probability of presence is considered high by the DEIR, there is no adequate survey of their presence. Further, the mitigation suggested does not consider or adequately protect for loss of steam bank habitat due to higher stream levels, nor does it adequately protect turtle hatchlings who need connectivity with water.[51]

[46] DEIR, 4.4-23
[47] Shane Hanofee, Redbud Chapter California Native Plant Society, president, personal communication, 2022
[48] DEIR 4.4-27
[49] DEIR 4.4-31
[50] Marion Blair, Biologist, B.S., M.S. Santa Clara Valley Water District, retired - personal communication, 2022
[51] Marion Blair, 2022

Grp 31-49

Hoary bat (Lasiurus cinereus) and Pallid bat (Antrozous pallidus) — the DEIR identifies "riparian and woodlands" for both species, and admit that the "disturbance" of the project could cause impacts.[52] Yet, the DEIR offers no surveys of bats, and does not consider the impacts of loss of woodland or riparian habitat in either the Brunswick or Centennial sites.

Grp 31-50

Raptors and Migrating birds — Numerous observations of Cooper's Hawk (Accipiter cooperii) are recorded for areas adjacent to the Brunswick site and the Bennett Street grassland potentially impacted by mine water discharge along Reach D.[53] Fledglings have also been observed locally during breeding season. Olive-sided Flycatcher (Contopos cooperi), another species of special concern, has also been observed along Reach D, in the Bennett Street grassland and riparian area.[54] Impacts to these species are not adequately considered in the DEIR.

Grp 31-51

Species of special concern, valuable in themselves, are also indicators of overall ecosystem health and resilience. A comprehensive, complete consideration of the presence or probable presence of special concern species, rather than one that is minimal and incomplete, is needed in order for this survey of biological resources to be complete. The DEIR itself admits that Madrone's peer review of the Biological Resources chapter of the DEIR "identified concerns with respect to the timing of the special-status plant surveys conducted for the Centennial and Brunswick botanical reports," and actually suggests that a remedy would be to conduct additional surveys AFTER the project is approved and prior to specific disturbance activities."[55] This defeats the whole purpose of an EIR, which is to clearly identify potential impacts as part of determining WHETHER the project should be approved. To do otherwise is to be negligent and to unknowingly expose biological resources to irreparable harm. Overall, this DIER fails to adequately consider both individual species of concern as well as the interconnected web of biological resources as a whole. Why hasn't the DEIR included or considered more inclusively the species of special concern listed above? How can this DEIR be considered adequate and complete if it does not adequately survey and consider these species of special concern?

4.4.4 Impacts and Mitigation Measures

Grp 31-52

Just as the delineation of environmental setting and the survey of biological resources are deficient in many regards, so also the measurement of impacts to biological resources and the mitigations proposed to reduce those impacts are inadequate in many regards. This is due to inaccurate or incomplete assessment of the environmental setting as detailed above, but also due to questionable assumptions used as the basis for impact analysis and proposed mitigation that do not sufficiently project species.

[52] DEIR, 4.4-39
[53] eBird, Cooper's Hawk, reported sightings, https://ebird.org/map/coohaw?env.minX=-135.084235786934&env.minY=4.04247779787781&env.maxX=-59.6257519208942&env.maxY=59.8487412198116
[54] Allison Nelson, Gold Country Avian Society, GCAS Bennett Street Grasslands bird list - 2020
[55] DEIR, 4.4-56

Issue 2.a - Present an inadequate Pine Hill Flannelbush Management Plan. (4.4-1)

The DEIR is required to consider the population of the decumbant Fremontodendron on the Centennial site as an endangered species until such time as further genetic analysis comparing different decumbant Fremontodendron populations is completed. The DEIR, therefore, given that the proposed project would involve 'taking' or impacting at least 14 Fremontodendron, presents a required management plan. This plan, however, ignores some of the basic considerations pertaining to the species. At III-20, the federal Recovery Plan for Gabbro Plants of the Central Sierra Nevada, on which the management plan is based, states that:

> Fremontodendron californicum ssp. decumbens is a shrub that persists through a fire cycle and requires fire for seed germination... Fire is needed to maintain habitat for this species.

And further that:

> *Preservation of the pollinating fauna (native solitary bees) and dispersal fauna (ants) is also important to the survival and recovery of F. californicum ssp. Decumbens.*[35]

Grp 31-53

Yet, the management plan does not in any way consider the requirement of "fire for seed germination." As the federal recovery plan clearly states, "Fire is needed to maintain habitat for this species." Further, the management plan does not consider pollinators or dispersal species. How can this management plan be considered sufficient without aspects of the plan including the regular introduction and management of fire and attention to pollinator and dispersal species in areas occupied by the decubant Fremontodendron?

Equally troubling is the inattention to a sufficient "buffer" in order to protect the plants and give sufficient space for fire management. As the federal plan states, there is a requirement for

> *"Sufficient unoccupied habitat for fire management and a 150 meter (500-foot) buffer"*[51]

Finally, plans to move and transplant Fremontodendron are unjustified without further study, which the DEIR does not present. The federal plan asks for

> *"Research on seed germination and propagation techniques"*

And sets the criteria for success not at 80% as the DEIR management plan suggests, but at 100% or more:

> *"The establishment of occurrences must continue to be greater than the extirpation of occurrences"*[35]

[35] Recovery Plan for Gabbro Plants of the Central Sierra Nevada, 2002, III-20
[51] Recovery Plan for Gabbro Plants of the Central Sierra Nevada, 2002, III-31
[35] Recovery Plan for Gabbro Plants of the Central Sierra Nevada, 2002, III-31

Transplanting mature Fremondendron is known to be difficult with no certainty of success. Without detailed study of its efficacy how can transplanting be included in this management plan? In sum, the Pine Hill Flannelbush management plan presented in the DEIR cannot be considered adequate and sufficient until it includes fire management, sufficient buffers, attention to pollinator and dispersal species, research showing the efficacy of transplanting individuals, and adherence to a success rate 100% or higher. Why has this management plan been presented without these crucial considerations?

Issue 2.b - Ignore and do not consider mitigation plans for species of special concern — Monarch Butterfly & Showy Milkweed (known to be present at the Centennial site), California Spotted Owl (reported as present in Empire Mine State Historical Park, which is adjacent to the Brunswick site), Yellow-breasted Chat (known to be present during breeding season in the meadow/grassland reach of the SFWC downstream of the Brunswick site) and Willow Flycatcher. (4.4-1) (4.4-2)

Grp 31-54

As discussed above, based on their presence or highly likelihood of presence on one of the two project sites or nearby, the DEIR should include specific, measurable, and actionable mitigation plans to protect the three species of special concern listed above. Mitigation plans for Monarch Butterfly and Showy Milkweed should follow guidelines detailed in the state's Western Monarch Conservation Plan.[59] Mitigation plans for California Spotted Owl and Yellow-breasted Chat should also be prepared and include guidelines based on standard CDFW protocols. As Yellow-breasted Chat (during breeding season) and the critically imperiled Willow Flycatcher have both been observed during breeding season in Reach D of the South Fork Wolf Creek downstream of the proposed mine water discharge site, mechanisms should be in place requiring the stoppage of mine dewatering if surveys by qualified biologists deem that dewatering is impacting Yellow-breasted Chat habitat. Mitigation plans should also include the latest biological and regulatory information, for example as laid out in the USFS's *Guidance on Limited Operating Periods for the California Spotted Owl*.[60] How can this DEIR be considered adequate and complete if it does not include appropriate mitigation plans for sensitive species known to be present in areas potentially impacted by the proposal?

Issue 2.c - Do not consider potential impacts to biological resources of the Brunswick site pond (PD1). (4.4-2) (4.4-3) (4.4-4)

Grp 31-55

The pond at the Brunswick site, identified in maps and text as PD-1,[61] is an important habitat for riparian plants, aquatic species, waterfowl, and migrating birds. Impacts to these biological resources need to be assessed in the context of rebuilding any of the physical features of the pond and subsequently using the pond for water treatment. This is not addressed in the DEIR. Given the existence of biological resources associated with the pond, how can impacts to these resources not be considered?

[59] California Department of Fish and Wildlife, https://wildlife.ca.gov/Conservation/Invertebrates/Monarch-Butterfly
[60] Guidance on Limited Operating Periods for the California Spotted Owl, 2006, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3812313.pdf
[61] DEIR, 4.4-15

Issue 2.d - Do not consider adequate mitigation for potentially impacted aquatic species, including BMI and trout. Nor does it include analysis and mitigation for the movement of trout and other aquatic species both upstream and downstream of the industrialized portion of the Brunswick site. (4.2-2) (4.4-4)

Grp 31-56

As previously pointed out in our comments on the environmental setting of the Brunswick site, the South Fork Wolf Creek has continuity as a perennial stream from a point above Brunswick Road (WCCA monitoring site 6.1) all the way to its confluence with the main stem of Wolf Creek in Grass Valley. As such, the continuity of the stream as an ecosystem needs to be addressed for potential impacts due to the proposed mine. Specifically, replacement of the 48" culvert that connects the creek's upper headwaters with its downstream reaches needs to be addressed.[52] Impacts to aquatic organisms, including BMI and trout need to be considered. As the DEIR itself states, Appendix G of the CEQA guidelines indicate that a significant impact would occur if the project would,

> *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites*[53]

The ability of these organisms to migrate upstream or downstream needs to be analyzed, with any potential impacts clearly delineated along with any mitigations necessary to protect these biological resources. How can we be assured that impacts to aquatic species, such as trout or BMI, will not be impacted upstream or downstream of the 48" culvert scheduled to be replaced without assessing impacts of that activity? What mitigations should be in place to protect those biological resources? This should include consideration of an alternative mitigation: remove the entire length of the culvert, and restore this stretch of the creek to a more natural setting.

Issue 2.e - Consider that habitat loss is an acceptable option if the species has not yet been observed, even if the likelihood of the species being present is high, including the destruction of nesting habitat for birds after the nesting bird has departed. (4.4-2)

Grp 31-57

Throughout the discussion of mitigations necessary to reduce the impacts on species of special concern the assumption is that only if the species in question is observed to be present immediately prior to or during construction or other disruptive activities is there a need for mitigation procedures. In most cases, the solution presented is to "to move individuals out of the disturbance areas to avoid impacting this species"[54] and then proceed with the activity. How does this protect the habitat of the threatened species? In the instance quoted, the DEIR is referring to Foothill Yellow-legged Frog, but the mitigation is repeatedly suggested, for Western Pond Turtle, Coast Horned Lizard, special status bats, including Townsend's big eared bats, raptors,

[52] As summarized for example at DEIR, 4.8-73
[53] DEIR 4.4-52
[54] DEIR 4.4-76

and migratory birds.[65] Removing individuals from their habitat does not protect the species if the habitat they are removed from is then distrubed or destroyed. How does this mitigation protect the species if its habitat is eliminated or damaged? The mitigation must include consideration of avoiding habitat destruction or assuring that suitable additional habitat is available?

Issue 2.f - Unreasonably suggest that a one-to-one replacement of wetland or monetary compensation is a preferred option for mitigating loss of wetland (4.4-3)

Grp 31-58

In both the Brunswick and Centennial sites considered for this project wetlands and riparian areas are identified as needing to be destroyed. For the Centennial site, the identified acreage unreasonably excludes extensive wetland currently present at the site. As the RAP developed by DTSC is currently not finalized, AND as impacts to that site should legally be included in a consideration of the impacts of this project, the acreage identified is wholly inaccurate.[66] Even if this was correct, we question the approach of the DEIR in mitigating impacts to wetlands. Federal law requires that preservation of wetland be considered as the preferential option when there is potential impact to these habitats. This is also put forth clearly in the Nevada County General Plan. Yet the DEIR does not consider in any way this option for the wetland involved and does not discuss possible preservation of the wetland areas it targets for elimination. Instead it states that it is a simple matter of "no net-loss" and that mitigation COULD include onsite and/or offsite wetland creation and/or restoration, payment of an in-lieu fee, and/or purchase of mitigation credits"[67] This mitigation is vague, unspecified, and out of keeping with the intentions of federal law and county plans. Wetlands in the headwaters area of Wolf Creek, in which both of these projects are proposed to take place, have greatly declined due to previous mine activity and subsequent urban and residential development. Each portion of wetlands is irreplaceable and connected organically with the hydrology of the watershed. Paying money in compensation for destroying wetlands is not an acceptable option for this project. Restoring wetlands in some generic way outside the sites and outside the watershed is not an acceptable option for this project. Project design options that avoid wetland destruction must be presented and evaluated. Why has the DEIR not looked at these options? Why has it not detailed any potential creation or restoration of wetland on-site? Applying for a permit and paying money is not an adequate mitigation.

Issue 2.g - Allow substantial impacts to riparian or wetland habitats, or disturbance within 100 foot setbacks from the South Fork Wolf Creek. (4.4-3)

Grp 31-59

Finally, the DEIR in its discussion of mitigations necessary to protect wetland, watercourse, and riparian areas is negligent in a number of respects.

First, the DEIR omits and avoids full consideration of wetland and riparian habitats at the Centennial site, making it impossible to judge to what extent those habitats would be impacted and how successful mitigations to those impacts would be.

[65] DEIR 4.4-76 to 4.4-80
[66] DEIR 4.4-80-81
[67] DEIR 4.4, Mitigation 4.4-3(c), 4.4-90

Second, the mitigations proposed for wetland mitigation unreasonably leave the reader with a bare list of mitigation options, ranging from:

> onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits. DEIR 4.4-90

Yet, the Nevada County Land Use and Development Code along with other federal and state agencies assert that

Grp 31-60

> "avoidance is the preferred standard unless the Planning Agency determines that implementation of this standard effectively removes the potential for the reasonable development of the parcel."[68]

The DEIR does not specifically consider and detail alternatives that would involve avoidance. Nor does it include any analysis of the potential for onsite or offsite wetland creation or restoration, which is preferable to fees or mitigation credits. In this sense, the DEIR is not pursuing any due diligence in considering options that would protect wetland or riparian areas. Why does the DEIR omit any consideration of specific alternatives? Could the site plans allow for avoidance of proposed disturbances to these habitats? Are there suitable on-site locations for creation or restoration? None of this is included in the DEIR.

Third, impacts due to disturbance to the section of South Fork Wolf Creek (with its unassessed BMI and trout populations) that flows through the existing culvert and the pond (PD-1) that currently contains significant (also unassessed) biological resources are not considered.[69]Why is that not the case? Surely stream connectivity suggests significant impacts to the SFWC if no mitigation is considered. In the same way, biological resources of the pond could be impaired or extirpated if no consideration is given to their existence.

Grp 31-61

Fourth, violations to the 100 foot setback from streams is not adequately addressed. Policy 11.7 of the Nevada County General Plan states:

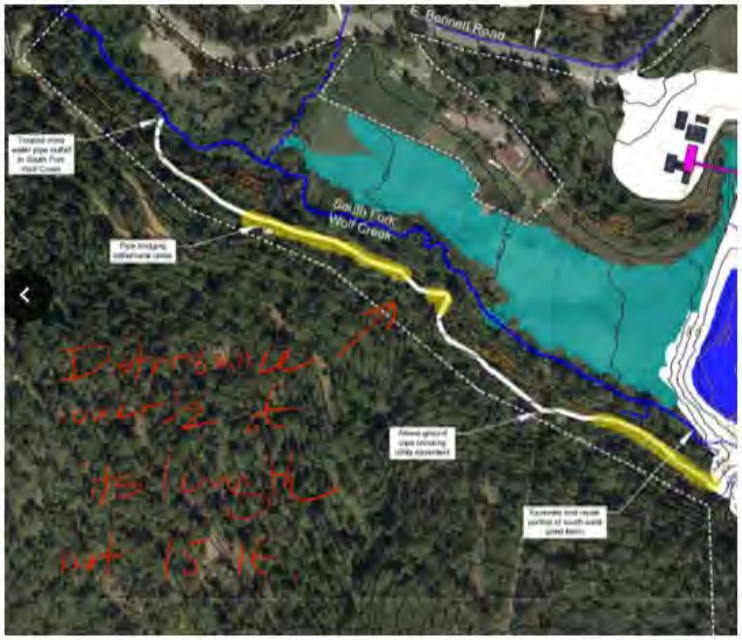
> Through the development and application of Comprehensive Site Development Standards, and project environmental review, establish and enforce minimum building setback lines from perennial streams and significant wetlands that are adequate to protect stream and wetland resource values.[70]

Grp 31-62

Yet, when considering stream setbacks the DEIR on the Brunswick and Centennial sites, the DEIR notes a number of instances where the proposed project would indeed violate minimum

[68] As quoted in DEIR, 4.4-49
[69] DEIR, 4.4-85
[70] As quoted in DEIR 4.4-46

setbacks.[71] Again, the DEIR does not explore alternatives to the described encroachment. Further, the extent of encroachment would appear to be misconstrued in the DEIR. At 4.4-85 the text suggests no more than 15 linear feet of permanent impact, but does not describe in sufficient detail the impact of the pipe paralleling South Fork Wolf Creek to the discharge point. Close examination of the accompanying map at 4.4-84 shows that this pipe would impact the "non-disturbance buffer zone" along approximately half its length, a much greater amount of impact that is not measured or quantified. The DEIR describes the route chosen for the pipe as along "an existing dirt road". This is a mischaracterization. It is not a road, it's a path through a riparian zone inhabited by trillium, equisetum, and the rattlesnake plantain orchid. It may have been used for logging 50 years ago, but it is not a road. One has to step over fallen trees, dodge poison oak, and jump over streams in the rainy season. The DEIR must be revised to accurately describe the proposed pipeline route as it really is; it must describe how the minimum setbacks will be maintained from the perennial creek and the multiple seasonal streams in this area, and how the riparian resource value will be maintained.



In sum, the DEIR does not consider carefully enough, comprehensively enough, or with an eye to their actual potential and the manner necessary to mitigate them, the impacts to biological resources involved in this proposed project.

[71] DEIR, 4.4-81

4.4-6 Cumulative Impacts and Mitigation Measures

Grp 31-63

The project proposed as presented in the DEIR includes a significant range of potential impacts that could persist, occur through accident or mismanagement over time, or be exacerbated by changing factors over the proposed 80 years of the project. The DEIR in no way addresses the potential synergies of these cumulative impacts, the likelihood of mitigations NOT protecting biological resources due to various foreseeable and indeed probable circumstances, or the extent to which changing climate or other serious environmental or human factors in the future might undermine mitigations or dramatically increase risks. This negligence on the part of the DEIR can be detailed through a number of specific issues.

Issue 3.a - Does not address the loss of forest land and associated stresses on forests as an essential factor of environmental health for the community (4.2-3)

Grp 31-64

The DEIR identifies more than 33 acres of forest land that would be lost as a consequence of the project, 31 acres of forest replaced by mine waste (which the DEIR chooses to call 'engineered fill'),[72] and somewhat less than 4 acres at the Centennial Site. This of course does not include any forest land not addressed or disclosed in the DEIR at the Centennial Site due to claim of separate consideration in an as yet incomplete DTSC RAP.[73] This forest land represents much of the diversity of forest habitats in the Wolf Creek Watershed and is a significant amount of forest land lost. This impact is ignored in the DEIR in spite of the language of impact 4.2-3 specifically mentioning

> *"the loss of forest land or conversion of forest land to non-forest use."*[74]

Why is this impact not considered? Loss of forest land impacts the whole watershed and the ecological resilience of forest land that is essential for the health and well-being of our community. It impacts water retention and storage in the watershed, a crucial factor in the context of increasing periods of drought due to climate change. It reduces forest species diversity and abundance, and limits breeding habitat and connectivity for species. Loss of forest is an impact that adds to others to be a cumulative impact on biological resources. Why is the cumulative impact of loss of forest land not fully addressed?

Grp 31-65

Issue 3.b - Does not address potential cumulative impacts of impaired air quality on forests, nearby meadow, or wetland and its associated species (4.3-1) (4.3-2)

[72] DEIR 2.0, Executive Summary, 2-2, DEIR 4.4-7 through DEIR 4.4-10
[73] DEIR 2.0, Executive Summary, 2-2, DEIR 4.4-4 through 4.4-6. This is based on comparing the acreage and map of forest habitats with the project description. It appears that a small section of Montane Hardwood Conifer habitat would remain outside the area of 'engineered fill.'
[74] DEIR 2.0, Executive Summary, 2-13

Air quality impacts forest, meadow, and wetland health as well as its related species. Whether it is emissions caused by the crushing of mine rock or the fumes of diesel trucks, this air quality impacts can have a cumulative, chronic impact on biological resources. Trees and other plant species are impacted by chronic exposure to airborne toxins and pollutants.[75] Why are the impacts of air quality on biological resources not addressed or evaluated?

Issue 3.c - Does not consider the loss of habitat an impact to special-status species, present or potentially present (4.4-1) (4.4-2) (4.4-6)

Grp 31-66

In its consideration of species of special concern only a few are considered to have an essential need for habitat. For others removal and destruction or impairment of habitat is deeded acceptable. Yet habitat loss across landscapes is cumulative. Why does the DEIR not address the overall loss of habitat for species of special concern (much less the whole complex of forest species that are essential to forest health) involved in the project?

Issue 3.d - Considers the net loss of wetland within the Wolf Creek Headwaters area in which the project is proposed to be an acceptable mitigation, significantly reducing and unduly impacting the environmental resiliency of the associated local ecosystems. (4.4-3)

Grp 31-67

Loss of wetland in one part of the watershed impacts other parts of the watershed. The watershed needs to be seen as a vital network of hydrological connections, much as we view our circulatory or lymphatic system. The impacts accumulate and impact the health of biological resources. Why does the DEIR not address the cumulative loss of wetland habitat proposed in this project?

Issue 3.e - Does not adequately consider the cumulative impact of mine water discharge or failure of water treatment or water retention at the Brunswick site. (4.6-2) (4.8-3) (4.8-7)

Grp 31-68

Mining operations in the Wolf Creek Watershed have had a history of creating severe impacts due to the failure of water treatment or the persistence of unmonitored and unmitigated mine discharges into its streams. The Magenta Mine discharge required legal action and millions of dollars of mitigation. The mine discharge from North Star mine shafts owned by Newmort upstream of the City of Grass Valley's water treatment plant similarly involved years of litigation and extensive re-engineering to successfully mitigate. In the meantime, streams of the watershed suffered through years of toxic discharge that impacted biological resources. The DEIR must present data, analytical study, and assurances that similar negative impacts to streams downstream of the proposed project would not happen. The DEIR simply references adherence to pertinent law and regulation and a water treatment plan that is not presented for consideration. No calculation of the impact of foreseeable accidents is discussed. No discussion of public monitoring and rigorous oversight is included. No calculation of increased potential for

[75] EPA, Plant Response to Air Pollution, 2002, https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=NHEERL&dirEntryId=50437

failure of water retention at the Brunswick site due to the increased intensity of storm events over the 80 year lifetime of the project is considered, nor any other intensifying impacts due to climate change. Mining, historical or modern, has a track record of having impacts in real operation far beyond what is projected in project proposals.[76] Why are these exigencies not detailed, elaborated, and considered? Any heavy industrial operation has the potential to include increasingly significant impacts, to water quality and to biological resources over time. Why is this not examined, given that the project proposes 80 years of operation?

Issue 3.f - Does not address environmental impacts of decreased groundwater in the the meadow/grassland reach of SFWC or other projected impact areas of the watershed. (4.8-2)

Grp 31-69

Drawdown of the water table due to mine dewatering is largely underestimated in the DEIR as well as the degree of certainty of those predictions. Additionally, increased temperatures and decreasing soil moisture due to accelerating climate change will likely combine with a lowering water table in forest or meadow areas adjacent to the proposed mine to exacerbate "stress complexes" leading to "increasing numbers of forest dieback events."[77] Depth-to-groundwater is a crucial factor for vegetation. As Eamus (2016) states,

> *An increased depth-to-groundwater may lead to reduced plant growth, mortality and change in species compositions.*[78]

The cumulative impact of changes in groundwater as it might impact biological resources is not considered or evaluated. This project is proposed to last 80 years. Why does the DEIR ignore the potential cumulative impacts of loss of groundwater to biological resources?

Issue 3.g - Does not consider the need to monitor existing mine seeps on the main stem of Wolf Creek in the event that mine dewatering impacts these seeps in ways that are not predicted.

Grp 31-70

At DEIR 4.8-14 four drains discharging mine water are discussed - Eureka Drain, East Eureka Shaft Drain, East Eureka Shaft and 'Unknown Origin' all of which empty in Wolf Creek. Water quality testing of these drains reveals high levels of some heavy metals. The DEIR suggests that, as these drains are connected to the network of mine shafts holding ground water, mine dewatering will eliminate these seepages. Nonetheless, given the groundwater connectivity of these drains with groundwater zones impacted by the proposed project, a reasonable amount of uncertainty exists. Dewatering might not reduce the outflow from these drains, or expansion of mine workings could alter the fracture typology of underground rock so that mine water seepage from these drains actually increases. Therefore, due diligence indicates that monitoring of these

[76] James R. Kuipers, et al., Comparison of Predicted and Actual Water Quality at Hardrock Mines, 2006
[77] Glazer & Likens, The Water Table: The Shifting Foundation of Life on Land, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3472013/
[78] Eamus, et. al., Groundwater Dependent Ecosystems: Classification, Identification Techniques and Threats, 2016, https://link.springer.com/chapter/10.1007/978-3-319-23576-9_13

existing mine seeps needs to be included. Why does the DEIR not include ongoing monitoring of these drains? In addition, the DEIR must address the fact that upon closure or decommissioning of the project (whether in 80 years or sooner), the underground workings will inevitably re-fill with water, and reemerge, with the same mix of contaminated water. Where will this water reemerge? The DEIR must also describe the treatment facility that will be necessary upon closure of the project, including funding sources for construction, maintenance, replacement after the expected life cycle of the facility, in perpetuity.

Issue 3.h - Does not address the impact to overall development impacts for the community of changing the land use zoning designation from light industrial to heavy industrial/mining. (4.9-4)

Grp 31-71

The change to county zoning that would allow a designation change from light industrial to heavy industrial has significant, cumulative impacts for the community, the county, and the watershed. Would this change allow other similarly intensive developments to take place? Or would it cause a reduction of less environmentally impactful developments due to the presence of the proposed project? How would future changes in zoning impact the watershed? These questions about the cumulative impact of land zoning changes need to be addressed. Why hasn't this been considered?

Issue 3.i - Does not adequately address impacts of increased noise on species, habitats, and ecosystems. (4.10-1) (4.10-2) (4.10-3)

Grp 31-72

Wildlife disturbance due to noise is partially addressed in the Biological Resources chapter at page 4.4-74. It included no data, and relies only on generalizations and citations from a limited selection of sources that create a one-sided picture of the impacts of noise on species, suggesting that species will become "acclimatized" to noise disturbance, that protected species have a "low potential" to be on the site, and that non-protected species can 'decline' due to noise disruption as their populations are not at risk of "declining below self-sustaining levels."[79] This callous disregard of potential impacts is negligent in that it discounts the potential impact and does not fully consider the various lines of research that do exist, and that increasingly link noise disruption with serious impacts to species. As the National Park Service states:

> In general, a growing number of studies indicate that animals, like humans, are stressed by noisy environments (Shannon et al. 2015). The endangered Sonoran pronghorn avoids noisy areas frequented by military jets; female frogs exposed to traffic noise have more difficulty locating the male's signal; gleaning bats avoid hunting in areas with road noise (Barber et al. 2009). When these effects are combined with other stressors such as winter weather, disease, and food shortages, sound impacts can have important implications for the health and vitality of wildlife populations…[80]

[79] DEIR 4.4-74
[80] NPS.gov, Effects of Noise on Wildlife, https://www.nps.gov/subjects/sound/effects_wildlife.htm

In fact, numerous studies suggest that noise disruption can negatively impact breeding success among migrating bird species, and that species leave habitat in order to be less impacted by noise.[81] The chronic impact of noise over the life of the project potentially would seriously impact species populations. Noise is a cumulative impact; along with the many other potential impacts mentioned, it works to negatively affect the biological integrity of large areas of the Wolf Creek Watershed. Why doesn't the DEIR investigate the cumulative impact of noise disturbance more completely, particularly with regard to the negative impacts already shown by research? Why doesn't it include specific data measuring potential db levels at various locations where biological resources might be impacted and correlate that data with the current range of noise research?

Issue 3.j - Does not fully address potential increases in risk of wildfire in an 80 year period that will see increasingly large and uncontrollable fire. (4.13-2) (4.13-5)

Catastrophic wildfire is a fast-increasing reality in our forest landscape. Yet, the DEIR barely considers its impact over the 80 year life of the proposed project. Why is this? The potential impacts, cumulatively should be obvious and therefore fully analyzed and considered.

Importantly, the DEIR needs to incorporate the science summarized in the California Department of Fish and Wildlife paper, Wildfire Impacts, 2022, where it states,

Grp 31-73

> Managing forests, woodlands, shrublands, and grasslands for broad ecological and societal benefits has become a challenging issue in California

And details the multiple impacts to biological resources:

> Due to increasing fire size, frequency, and susceptibility to beetle outbreaks and drought driven mortality, forest biodiversity and composition is changing rapidly. Changes in vegetation structure alter important aspects of fire regimes (e.g., magnitude, frequency, seasonality), and these changes affect the management of biodiversity, groundwater management, forestry, recreation, as well as human safety. Atypically large patches of high-severity fire can hinder the ability of an ecosystem to recover, potentially undermining conservation of native biodiversity by long-term or permanent loss of native vegetation, expansion of non-native, invasive species, and long-term or permanent loss of essential habitat for native fauna.[82]

[81] Graeme Shannon et. al., A synthesis of two decades of research documenting the effects of noise on wildlife, 2015, https://onlinelibrary.wiley.com/doi/abs/10.1111/brv.12207; see also the research of Colorado State University's Sound and Light Ecology Team, https://sites.warnercnr.colostate.edu/soundandlightecologyteam/publications/

[82] CA Department of Fish and Wildlife Science: Wildfire Impacts, 2022, https://wildlife.ca.gov/Science-Institute/Wildfire-Impacts

Wildfire, just last year, passed through portions of the Centennial site.[83] Other, larger, recent fires, such as the River Fire threatened the city of Grass Valley and the area where this project is proposed.[84] Over the projected lifetime of this project, the likelihood of wildfire or prescription burning is close to 100%. Yet, the DEIR does not incorporate any discussion of the risk, the probability, and the impact of fire to the project or to the biological impacts created by the project. Why is this? Does the DEIR assert that increasing impacts of wildlife do not interact or influence impacts required to be considered by CEQA? The governor's recently created California Wildfire and Forest Resilience Task Force in January of 2021 published its *California's Wildfire and Forest Resilience Action Plan*. In it, clear guidelines are set forth that this DEIR needs to consider, follow, and analyze:

- Does this proposed project contribute to "restoring the health of our forests?"
- Does this proposed project "protect and expand urban canopy and forests?"
- Does this proposed project "increase prescribed fire?"
- Does this proposed project increase fuel breaks, protect wildfire-prone homes and neighborhoods, improve utility-related wildfire risk, create fire-safe roadways, reduce health impacts of smoke?"
- Does this proposed project "utilize best available science…to expand and improve monitoring?"[85]

The challenges are immense, but existential for California, for its communities and for its biological resources. The DEIR needs to fully address the cumulative impacts of these challenges over the lifetime of this project. Why has the DEIR not done this? How can this DEIR be considered complete without addressing these concerns?

80 years from now is the year 2102. Given the potential acceleration of climate change just to the year 2050, much less the turn of the next century, surely it is not only reasonable but imperative that this DEIR include an extended analysis of the impacts of increasing wildfire and prescribed burning, and the ways in which the potential impacts of this project could synergize or exacerbate impacts to biological resources.

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[83] Cal Fire, Bennett Fire Incident, 08/25/21 - 08/28/21, https://www.fire.ca.gov/incidents/2021/8/25/bennett-fire/
[84] Cal Fire, River Fire Incident, 08/04/21 - 09/13/21, https://www.fire.ca.gov/incidents/2021/8/4/river-fire/
[85] California Wildfire & Forest Resilience Task Force, California's Wildfire and Forest Resilience Action Plan, 2021, https://fmtf.fire.ca.gov/media/cjwfpckz/californiawildfireandforestresilienceactionplan.pdf

Grp 31-74

Final Comments

Based on the failure of this section of the DEIR to identify and account for impacts to biological resources and its inadequate proposals for mitigation we identify 5 areas of impact where the impact designation should be changed.

Impact	DEIR's Proposed level of Significance	Actual potential level of significance
4.4-1 Special Status Plant Species	LS	S
Does not adequately address impacts to Pine Hill Flannelbush and other species of special concern		
4.4-2 Special Status Wildlife Species	LS	S
Does not include or adequately address impacts to Monarch Butterfly, Yellow-breasted Chat, Willow Flycatcher, California Spotted Owl, and other species of special concern		
4.4-3 Riparian habitat, wetland or other sensitive natural community	LS	S
Does not address impacts to Centennial wetlands, to the full length of South Fork Wolf Creek, to the Brunswick Pond, to BMI, and to aquatic ecosystems downstream impacted by mine water discharge		
4.4-4 movement of native fish or wildlife	LS	S
Does not address movement of native fish along the full length of South Fork Wolf Creek		
4.4-6 Cumulative Impacts	LCC	CC
Does not address loss of forest or wildlife habitat, or cumulative impacts due to chronic stress for species, lowering of water table, air quality, noise, risk of system failure over time, wildfire, and climate change		

LS = Less Than Significant LCC = Less Than Cumulatively Considerable
S = Significant CC = Cumulatively Considerable[86]

[86] See table 2-1 in DEIR, Chapter 2, Executive Summary, pages 2-30 and following

Grp 31-75

Overall, this DEIR fails to consider biological resources as a whole, interconnected system of living parts, each dependent on the other, as well as on the complex of abiotic factors that make the integrity and resilience of the whole possible. Our comments have highlighted the many ways in which the details of the DEIR's data and analysis are incomplete and inadequate. However, it is the lack of regard for the cumulative, interconnected impacts that most stands out. We ask that this DEIR be recirculated so that its lack of data can be addressed, its omissions of biological resources corrected, its conclusions and analysis of impacts and mitigations rewritten. Most importantly, we ask that the biologists who engage in the writing of this DEIR truly consider the biological wholeness of what they study and make judgment upon. We are all part of an interconnected system of relations. We who live in this community are all of one watershed.

Sincerely,

Gary Griffith
Josie Crawford
Jonathan Keehn

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GROUP LETTER 31: JONATHAN KEEHN, WOLF CREEK COMMUNITY ALLIANCE

Response to Comment Grp 31-1

This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Comment noted.

Response to Comment Grp 31-2

The commenter generally states the DEIR biological analysis was insufficient. Specific concerns are provided by the commenter in the following comments. Please see Master Response 30 - Technical Study Adequacy, and Responses to Comments Grp 31-3 to Grp 31-7 below.

Response to Comment Grp 31-3

The commenter states that the DEIR improperly separates the Centennial cleanup project and therefore does not consider the current existing baseline at the Centennial site. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 31-4

The commenter asserts the upstream and offsite portions South Fork Wolf Creek were not analyzed nor considered for potential impacts, including movement of trout and other species. The DEIR, including Appendix F.7, identifies the onsite portion of South Fork Wolf Creek as perennial. The upstream portion of South Fork Wolf Creek is offsite and would not be impacted by the project.

Flows from offsite upstream drainage that flows through the existing onsite culvert were analyzed as part of the site drainage analysis when sizing the onsite detention basin. Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR Section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows. West Yost's independent peer review concurs with this conclusion." (DEIR page 4.8-75)

In addition, the DEIR biology and hydrology sections included analysis of treated water discharge into South Fork Wolf Creek. DEIR Impact 4.4-2 analyzed potential impacts to special status species that may use South Fork Wolf Creek and the surrounding habitat. DEIR Impact 4.4-3 considered potential impacts to the riparian habitat surrounding South Fork Wolf Creek. DEIR Impact 4.8-1 considered whether treated water discharge would degrade water quality standards. DEIR Impact 4.8-2 analyzed potential drawdown impacts to South Fork Wolf Creek resulting from dewatering. DEIR Impact 4.8-3 considered potential erosion and sedimentation impacts resulting from treated water discharge. As demonstrated above, impacts to South Fork Wolf Creek were considered and analyzed in the DEIR.

Please also see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 31-5

The DEIR, and Appendix F.7, both identify the onsite pond as a historic man-made clay-lined pond that was associated with historic saw milling operations. The pond is a non-jurisdictional "water of the United States" but may be considered a "water of the State of California." Special-status species that may use the pond and surrounding habitat were considered in Impact 4.4-2. This impact was considered potentially significant but reduced to a less than significant level with mitigation. Mitigation covered a variety of special-status species and required preconstruction surveys, potential state and federal permitting, implementation of avoidance and protection measures, and preparation of management plans. Impacts to "waters" was considered in DEIR Impact 4.4-3. This impact was considered potentially significant but reduced to a less than significant level with mitigation. Mitigation included additional state and federal permitting and preparation of management plans.

Response to Comment Grp 31-6

Please see Response to Comment 31-4 above. In addition, please also see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Grp 31-7

The commenter asserts that species were misidentified or incompletely identified, and that the DEIR downplays potential presence of special-status species. However, the commenter does not specifically state which species they believe were mistaken or excluded. Please see Master Response 30 - Technical Study Adequacy, Master Response 31 - Rare Plants, Master Response 34 - Resident Fish, and Master Response 37 - Birds and Raptors.

Response to Comment Grp 31-8

The comment generally states the mitigation measures in the DEIR are inadequate, and provides specific concerns in the following comments. Please see Responses to Comments Grp 31-9 to Grp 31-15.

Response to Comment Grp 31-9

The commenter raises concerns that Mitigation Measure 4.4-1(a), which requires a habitat management plan for Pine Hill flannelbush impacts, does not contain sufficient detail regarding monitoring and success criteria. As explained in Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prohibited by the DEIR, and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) and the draft habitat management plan provides alternative maintenance transplantation measures to help achieve success criteria.

Mitigation measure 4.4-1(a) provides the requirements the management plan must include in order to be approved by the County and some of the performance and success criteria that should be included in the habitat management plan. Mitigation measure 4.4-1(a) is not intended, nor required, to have every detail of the habitat management plan, which is a separate document that was included in Appendix F.2 to the DEIR. The mitigation measures, consistent with the requirements of CEQA, provide clear standards, timeframes, and responsibility such that



mitigation measures can be enforced by the County. Follow up special-status plant species surveys were conducted the last two weeks of June 2022 within the project area, including areas impacted by the 2021 fire that occurred within the Centennial site, and flannelbush seedlings were documented growing in a very small portion of the area impacted by fire within the Centennial site. No other special-status plant species were identified within the areas impacted by fire or within the overall project site. Given the USFWS does not consider any flannelbush species in Nevada County to be the listed variety, an ESA consultation would not be required with the agency as part of the approval and permitting of the project. However, coordination with CDFW regarding the flannelbush will occur as part of the project regarding the implementation of Mitigation Measure 4.4-1(a). Notably, CDFW had no recommendations for further mitigation for the species as part of their DEIR comment letter dated April 4, 2022, which is evidence that the expert agency, CDFW, found the mitigation to be sufficient.

Response to Comment Grp 31-10

Please see Master Response 37 - Birds and Raptors, regarding yellow-breasted chat and Willow flycatcher. The showy milkweed was identified on the project site but is not a listed plant and therefore not analyzed in the DEIR.

The CNDDB has only historically tracked overwintering sites for monarch butterfly, not breeding locations. As such, no monarch occurrences are documented within the 9 quad CNDDB review, nor is it included as unprocessed data within the 9 quad CNDDB search. The species has not been documented within the project site during the many site visits and wildlife surveys conducted between December 2018 through June 2022. The showy milkweed is not protected (has no CNPS status), but it was identified in both the Centennial and Brunswick sites during the 2019 botanical surveys. However, given the project sites are not located along a known monarch butterfly migration corridor and the species has not been mapped within the 9 quad CNDDB search, the species is considered to have a low potential to occur on the project site. Table 4.4-6 of the DEIR (page 4.4-35), is hereby revised to discuss the monarch butterfly and identify the potential for monarch butterfly occurrence onsite as low.

Common and Scientific Name	Legal Status	Habitat Requirements	Potential for Species/Habitat Presence
Monarch butterfly *Danaus plexippus*	FC/--	Monarch butterfly has not been documented within the CNDDB within 5 miles of either the Centennial Industrial Site or Brunswick Area. Neither site contains many milkweed plants, the host plant for the species. This species is of a Federal Candidate for listing under the ESA.	**Centennial Industrial Site and Brunswick Area** **Low.** The species was not identified within either area during the surveys conducted in 2018, 2019, and 2022. Both sites contain very few and scattered milkweed plants. Anecdotal evidence shows the species to have been previously documented within the greater Grass Valley area. It is unlikely to occur in the Centennial Industrial Site or Brunswick Industrial Site.

Page 4.4-39 of the DEIR is also hereby revised to include additional discussion of monarch butterfly as set forth below:

Monarch butterfly (*Danaus plexippus*) – Federal Candidate for ESA Listing

The monarch butterfly has not been previously identified within five miles of the Centennial Industrial Site and Brunswick Area per an updated review of the CNDDB (CNDDB 2022); however, there is some anecdotal evidence that the species has been documented within the greater Grass Valley area (per iNaturalist). Per a review of iNaturalist, the species has never been documented within the Empire Mine State Historical Park located adjacent to the Brunswick Area; however, such websites are not peer reviewed scientifically or by state or federal biologists and should be considered anecdotal until additional documentation of the species are considered validated by state and/or federal biologists, or the scientific community. The species is considered a Federal Candidate for listing under the ESA and the USFWS maps the entirety of the United States as potential habitat for the species. The Centennial Industrial Site and Brunswick Area contain a few, scattered milkweed plants (the host plant of the monarch butterfly), but given the species was never documented within either the Centennial Industrial Site or the Brunswick Area during botanical and wildlife surveys, the species is considered to have a low probability of occurring within either the Centennial Industrial Site or the Brunswick Area.

The above changes are provided for clarification purposes, and do not alter the analysis, nor conclusions of the DEIR.

With regard to California spotted owl, please see Master Response 37 - Birds and Raptors. As discussed therein, in response to several public comments and information available on the Biogeographic Information and Observation System (BIOS) managed by CDFW, the Final EIR includes specific discussion of the California spotted owl (CSO) species. The California spotted owl is not listed as threatened or endangered in the federal Endangered Species Act (ESA) or the California State Endangered Species Act (CESA) but is rather referred to as a Species of Special Concern by CDFW, which do not require take permits for incidental take, but do require analysis under CEQA. The DEIR acknowledges that raptor nests and eggs are protected by Section 3503.5 of the California FGC, which states, “It is unlawful to take, possess, or destroy any birds in the order *Falconiformes* or *Strigiformes* (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the code or any regulation adopted pursuant thereto.” Notably, the DEIR also acknowledged that the Brunswick site has suitable habitat for raptors (owls are a type of raptor), and included mitigation specifically for raptor and nesting bird species. (See Mitigation Measure 4.4-2(g).)

As identified in the BIOS database, a CSO nest was documented within the Brunswick Area in 2011. Three additional follow up surveys in 2012, 2016 and 2018 did not document the presence of a nest but did document the presence of a pair of CSO (in 2012 and 2016) and a single male CSO in 2018. Based on the information from BIOS, and to clarify the analysis provided in the DEIR on impacts to raptors, two surveys for presence and nesting status of California spotted owl were conducted by a qualified biologist pursuant to the United States Forest Service (USFS) protocol (1992) on the Brunswick site. California spotted owl callback surveys were conducted at two locations within the Brunswick Area on August 5, 2022 and then again on August 11, 2022. No CSO responded to any of the calls from either survey station either night (Please see Appendix I to this Final EIR for the Technical Memorandum for the Idaho-Maryland Mine Project – Brunswick Area California Spotted Owl Surveys and Assessment, August 2022).

Given the information obtained via BIOS 6, identifying four previous sightings of CSO on the Brunswick Site, Table 4.4-6 in the DEIR has been updated in Section 4.4 of the FEIR to include California Spotted owl by name, and to indicate that the potential for CSO nesting onsite is

Moderate, while potential for presence of transitory CSO onsite is High, as shown on the following page.

In addition, page 4.4-39 has been revised to include a species discussion of California spotted owl, as follows:

> California Spotted Owl (*Strix occidentalis occidentalis*) – CA State Species of Concern
>
> California spotted owl have been previously identified within five miles of the Centennial Industrial Site and Brunswick Area, including a location potentially within the border area of the southwestern section of the Brunswick Area and adjacent to the Empire State Historic Park border (CDFW BIOS 2022). The Brunswick Area is generally considered wintering habitat for the California spotted owl and suitable nesting sites for the species are generally considered to be located to the east of Brunswick Road (see CDFW BIOS 2022 habitat mapping for the species). The individuals identified within the southwestern section of the Brunswick Area could be individuals that have moved in from nesting sites outside the Brunswick Area, including the Empire State Mine Historic Park where a pair of California spotted owls have previously been identified (State Parks, 2009). Surveys conducted within the Brunswick Area forested habitat for the project in December 2018, January 2019, and July 2019 did not identify the presence of the species when reconnaissance-level biological resources surveys were conducted for special-status wildlife species. In addition, on August 5, 2022, a raptor biologist with previous experience conducting USDA Forest Service protocols for surveying the California spotted owl did not identify the presence of the species when amplified calls of the California spotted owl were conducted from two (2) locations within the southwestern and western sections of the Brunswick Area (see USFWS 1992 for protocol for the presence, absence, and nest sites for the California spotted owl).
>
> California spotted owl inhabits older, closed canopy forests and forages for prey that require woody debris and understory vegetation for cover. The species nests in cavities of trees and snags. To accurately document the location of a California spotted owl nest, USDA as part of their protocol for the California spotted owl, includes both the identification of a pair of owls and documenting the female in the nest or a male bringing a prey item (usually a mouse placed by the observer) back to a female in the nest. A sighting and/or call back of an individual, pair, and/or juvenile California spotted owl does not reflect that the species is nesting at that exact location given a California spotted owl territory can be quite large (mean up to 946 to 1,520 acres in the Tahoe Nation Forest, see Roberts 2017). The USFWS (1992) protocol for determining whether nesting is confirmed at a location includes that the following conditions are observed:
>
> - Two observations, at least 1 week apart, are required to determine nesting status if the first observation occurs before 1 May. This is necessary because the owls may show signs of initiating nesting early in the season without actually laying eggs and their behavior could easily be mistaken for nesting behavior.
> - After 1 May, a single observation is sufficient. Nesting is confirmed if, on 2 visits before 1 May, or 1 visit after 1 May several additional parameters are met.

Common and Scientific Name	Legal Status[1]	Habitat Requirements	Potential for Species/Habitat Presence
California spotted owl *Strix occidentalis occidentalis*	--/SSC	California spotted owl inhabits older, closed canopy forests and forages for prey that require woody debris and understory vegetation for cover. The species nests in cavities of trees and snags.	**Centennial Industrial Site** **None**. Suitable habitat for the species is absent. **Brunswick Area** **Moderate potential for CSO nesting, and High potential for transitory CSO**. Brunswick Industrial Site contains habitat within the southern section of the site. The species has been previously documented within that area along the border of the site with the neighboring parcel. Species documented in 2011, 2012, 2016, and 2018, but the species was not identified within the site during the surveys implemented in December 2018, early January 2019, July 2019, or August 2022. A nest has not been seen onsite since 2011. Further, the two protocol surveys conducted in 2022 did not identify any CSO onsite. Therefore, the potential for CSO nesting onsite is Moderate, while the potential for CSO that may be moving through the site or foraging onsite is High.

The observer that documented the California spotted owls within the southwestern section of the Brunswick Area on April 28, 2011 stated that the sighting's highest use could be a nest and that a single young was also sighted on that day. Follow up surveys for the California spotted owl within the southwestern section of the Brunswick Area were conducted in May 2012 and in April 2016, when a pair of owls was documented within the same general location each time, but nesting was not listed as the highest level of use, just use by a pair of owls was listed. Furthermore, in 2018 (no date or month was given), a single resident California spotted owl was documented in the same general area in the southwestern section of the Brunswick Area and was considered a resident and not part of a pair.

Therefore, given there is no additional information to confirm the site was an active nest in 2011 (no confirmation of a female within the nest or confirmation of male bringing prey to an active nest with a prey item like a mouse), and given that a required follow up survey was not conducted by the observer at least 7 days after the initial documentation of the owls at this location since the initial documentation occurred in April 2011 (per the USFWS 1992 protocol), it is inaccurate to call this location a nesting site. Based on the site visits in late 2018, early 2019, and summer 2019, which did not identify the area within the southwestern section of the Brunswick Area as suitable nesting habitat for the species given a lack of required snags, etc. within that section of the Brunswick Area, it is quite likely that a single resident or pair of California spotted owl that live within the Empire State Historic Mine Park use the forested area of the southwestern section of the Brunswick Area for potential foraging and overwintering.

Centennial Industrial Site: No potential suitable habitat for this species occurs within the Centennial Industrial Site.

Brunswick Area: The potential for this species to occur within the forested areas within the southwestern and western sections of the Brunswick area is considered high. This area represents wintering and foraging habitat for the species and it is highly unlikely the species uses the area for nesting given the lack of snags and open areas within the ground that is required for foraging when nesting. Given that any vegetation to be removed within the southwestern and western forested areas of the Brunswick Area would occur between September and January, there is no likelihood for this species to be impacted, given that if present, they would fly away during the removal of such vegetation.

Chapter 7, references of the DEIR is also hereby revised to add the following citations:

U.S. Fish and Wildlife Service (USFWS). 1992. Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls.

State of California. 2009. Addendum and Final Initial Study and Mitigated Negative Declaration Osborne Hill Trail Network Project State Clearinghouse #2008112086 (within the Empire Mine State Historic Park). Department of Parks and Recreation, Sacramento, California (January 2009).

Roberts, S.L. 2017. Chapter 3: California Spotted Owl Habitat Characteristics and Use. In USDA Forest Service General Technical Report PSW-GTR-254: The California Spotted Owl Current State of Knowledge.

As discussed in Master Response 37, the DEIR already acknowledges that raptor nests and eggs are protected by Section 3503.5 of the California FGC, which states, "It is unlawful to take, possess, or destroy any birds in the order *Falconiformes* or *Strigiformes* (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the code or any regulation adopted pursuant thereto." Notably, the DEIR also acknowledged that the Brunswick site has suitable habitat for raptors (owls are a type of raptor), and included mitigation

specifically for raptor and nesting bird species. For clarification purposes, Mitigation Measure 4.4-2(g) has been revised as shown in Master Response 37.

The above changes amplify the existing discussion of raptors in the DEIR, for which mitigation has already been included, and do not alter the conclusions of the DEIR, which remains less than significant with implementation of mitigation measures.

Response to Comment Grp 31-11

Please see Response to Comment Grp 31-4 above.

Response to Comment Grp 31-12

The commenter states that the DEIR should focus on Benthic Macroinvertebrates, but does not provide any specific comment on how the project could have an adverse impact. Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. CDFW conducted a thorough review of the DEIR and submitted a comment letter on the DEIR (letter dated April 4, 2022). CDFW also conducted electrofishing within three stretches of the South Fork Wolf Creek to identify native fish populations downstream of the proposed discharge (Memorandum report dated March 23, 2022). CDFW did not make any comments on the project's potential impacts to BMI and they only identified two non-native fish species downstream of the proposed discharge point within the Brunswick site. CDFW is concerned with impacts to riparian vegetation and fish and amphibian populations downstream, but did not mention BMI as a concern in either their comment letter or electrofishing Memorandum.

There are no US EPA water quality criteria for the protection of aquatic life for electrical conductivity, total dissolved solids, and sulphate (See page D-34 of Order R5-2022-0006). However, the secondary MCL for Electrical conductivity of 900 umhos/com is the recommended level for the protection of agricultural supply by the Central Valley Water Board (See page D-34 and D-35 of Order R5-2022-0006). As discussed on page 4-5 of Appendix K.4, electrical conductivity (EC) is associated with Total Dissolved Solids (TDS). Appendix K.2 listed EC values for the New Brunswick Shaft water as approximately 385 µS/cm. The mobilized divalent ions from the carbonate and sulfide minerals would add to that specific conductance, although it would require significant contributions of Ca, Mg, and SO4 to surpass the NPDES CAG995002 screening level of 900 uS/cm. However, if treatment is deemed necessary for TDS mitigation at some point during mining operations through required water quality monitoring (see Mitigation Measure 4.8-1(a)), it is Linkan's opinion that mobile ion exchange water softeners should be deployed as compared to building additional permanent infrastructure that may not be needed or only needed for relatively short periods. These mobile units are readily available, and various vendors offer the service of replacing them as necessary as the resin becomes spent and in need of regeneration. Additionally, the resins used for these constituents are common throughout the industry for softening water and do not pose a health or environmental risk. Therefore, the proposed water treatment plant is capable of ensuring that conductance of discharged mine water meets water quality goals and the required Notice of Applicability would ensure compliance (see Master Response 35 – Discharge to South Fork Wolf Creek). The Project Applicant must adhere to the NPDES discharge limits within South Fork Wolf Creek, which would minimize any potential impact to downstream aquatic resources.



Response to Comment Grp 31-13

As discussed in DEIR Impact 4.4-2, special-status species impacts, including potential loss of habitat, was already analyzed. This impact was considered potential significant, and the DEIR requires preconstruction surveys for species, even species not observed onsite during surveys, prior to surface disturbance.

DEIR Impact 4.4-2 considered impacts to birds, raptors, and migratory birds and determined this impact was potentially significant. Mitigation measures, including Mitigation Measure 4.4-2(g) (requiring pre-construction surveys for raptors and migratory birds) were required to reduce this impact to a less than significant level. The commenter asserts that it is problematic that nesting habitat may be removed after a nest is no longer occupied but does not explain how that would result in significant impacts to a special-status species. Please see Master Response 37 - Birds and Raptors.

Response to Comment Grp 31-14

The commenter suggests that compensatory mitigation or payment of in-lieu fees is not a reasonable mitigation strategy. However, these mitigation strategies are widely used and accepted. Mitigation Measure 4.4-3(c & d) provides a series of compensatory mitigation options that will be negotiated during the section 404 and 1600 permitting process, and the Corps and CDFW will require mitigation based on its established mitigation ratios, which are usually greater than 1:1. The mitigation option identified and ratios at which mitigation is required is based on consultation and approval by state and federal agencies involved in the permitting process. For clarification, Mitigation Measures 4.4-3(c & d), on page 4.4-91 of the DEIR, shall be revised to reflect that the minimum mitigation ratio for compensatory mitigation shall be 1:1, and higher ratios may be implemented if required by the agency issuing the respective permit. The revised language of Mitigation Measures 4.3-3(c) and 4.4-3(d) is set forth below:

4.4-3(c) *To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Prior to initiation of ground-disturbing activities, a Section 404 permit for fill of any jurisdictional wetlands within the Centennial Industrial Site and Brunswick Area shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the Corps "no-net-loss" policy, be provided at a minimum 1:1 ratio and be based on the final impact acreages verified by the Corps. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines. Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.*

The applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Nevada County Planning Department.

4.4-3(d) *Prior to initiating of ground disturbing activities within the non-disturbance buffers for aquatic resources on the Centennial Industrial Site and Brunswick Area, the applicant shall apply for a Section 1600*

> *Lake or Streambed Alteration Agreement from CDFW. Impacts to CDFW 1600 jurisdictional areas shall be outlined in the application and are expected to be in substantial conformance with the impacts to biological resources outlined in this EIR (see Tables 4.4-9 through 4.4-11). Impacts for each activity shall be broken down by temporary and permanent, and a description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent. Minimization and avoidance measures within jurisdictional areas shall be proposed as appropriate and may include: preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas immediately adjacent to riparian areas with native seed, and installation of project-specific storm water BMPs. Mitigation may include restoration or enhancement of jurisdictional resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, off-site or on-site conservation easements, working with a local land trust to preserve aquatic or riparian areas, or any other method acceptable to CDFW. Mitigation shall be provided at a minimum 1:1 ratio.*
>
> *A site revegetation plan would be required to be developed and approved by CDFW as part of a Streambed Alteration Agreement permit condition and native trees planned for removal with a diameter at breast height of 4 inches or greater would need to be mitigated for through planting of native riparian trees within adjacent stream zones not being impacted by the Idaho-Maryland Mine Project, with clear success criteria identified, monitoring and reporting required, and corrective actions to be taken if mitigation measures do not meet the proposed success criteria.*
>
> *Written verification of the Section 1600 Lake or Streambed Alteration Agreement shall be submitted to the Nevada County Planning Department.*

The above minor changes are for clarification purposes and do not affect the adequacy of the analysis contained in the DEIR.

Response to Comment Grp 31-15

The commenter states that the DEIR mischaracterizes the degree and extent of the disturbance to South Fork Wolf Creek setbacks. As analyzed in DEIR Impact 4.4-3, encroachment into the South Fork Wolf Creek 100-foot setback is necessary for the replacement of the deteriorated culvert currently outfalling into South Fork Wolf Creek, existing clay-lined pond repair activities, and installation of the treated water pipeline discharge. These are necessary project components, so avoidance of this setback is not feasible. As such, this encroachment was considered a potentially significant impact. Mitigation measures have been required, including additional agency permitting (Mitigation Measure 4.4-3(a, c, & d) and preparation of a management plan (Mitigation Measure 4.4-3(b), and the impact has been determined to be less than significant after mitigation. The commenter does not explain its statement that the encroachment is mischaracterized.

Response to Comment Grp 31-16

The commenter generally states that the DEIR did not adequately analyze cumulative impacts of the project, due to the interconnected nature of the environment and the changing environment

due to climate change. With regard to climate change, there is no consensus on how climate change will affect groundwater recharge and numerous other areas of concern, so analysis based on varying climate change predictions would be speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As analysis of climate change scenarios, when there is no consensus on how climate change will affect the project site, would be speculation, this analysis is not required by CEQA. Further the DEIR already analyzes varying climate conditions such as large storm events and multiple drought year scenarios, so the analysis already is responsive to the commenter's concerns. Please see Master Response 16 – Drought and Climate Change.

Response to Comment Grp 31-17

The commenter states that the DEIR does not address the loss of forest land and stresses on forests. As discussed in Section 4.2.1, Existing Environmental Setting (subsection Forest Resources), the project site is not zoned for forest land or timberland uses. The project site does have lands meeting the definition of forested land (10 percent or more of native tree cover) and timberland (available for, or capable of, growing a crop of trees). (See DEIR, p. 4.2-9.) As noted in Impact 4.2-3, the amount of forest and timberland converted by this project is insignificant compared to the available forest and timberland resources in the County and Statewide. For example, the conversion of 25 acres within the project site is approximately 35% of the resources within the project site, and less than 1/10 of 1 percent of the County forestlands per the General Plan. The DEIR correctly concluded this impact is less than significant. (See DEIR Impact 4.2-3.)

Response to Comment Grp 31-18

The commenter asserts that the DEIR does not address potential cumulative impacts of impaired air quality on forests, meadows, wetlands and associated species. The DEIR analyzed cumulative air quality impacts on pages 4.3-91 to 4.3-92 and determined that impacts would be less than cumulatively considerable. Please see Master Response 18 – Air Quality Thresholds and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Grp 31-19

The commenter asserts that the DEIR does not consider the loss of habitat for special-status species, present or potentially present, to be an impact. However, as discussed in DEIR Impact 4.4-2, special- status species impacts, including potential loss of habitat, was already analyzed. This impact was considered potentially significant and required preconstruction surveys for species, even species not observed onsite during surveys, prior to surface disturbance. (See Mitigation Measures 4.4-1(a-b), 4.4-2 (a-g), and 4.4-3(a-d).)

Response to Comment Grp 31-20

The commenter states that the DEIR incorrectly considers the net loss of wetland within the Wolf Creek headwaters as acceptable mitigation. However, as discussed on page 4.4-95 of the DEIR, Mitigation Measure 4.4-3(c) would require that the proposed project conform with the Corp's "no-net-loss" policy for wetland mitigation. Thus, any wetlands lost within the project area must be compensated through the protection of existing wetlands, avoidance of wetland impacts, or creation of new wetland habitat elsewhere. Please see Response to Comment Grp 31-4.

Response to Comment Grp 31-21

The commenter states that the DEIR does not adequately consider cumulative impact of mine water discharge or failure of water treatment or water retention at the Brunswick site. Cumulative water quality impacts were already analyzed in Impact 4.8-7 of the DEIR. Please see Master

Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

The water treatment facility will be subject to multiple permits regulating discharge of treated water into South Fork Wolf Creek, including monitoring of water quality. (See Mitigation Measure 4.8-1(a).) In the event of accident or unforeseen conditions, the operator would be subject to enforcement actions, and potential agency fines and penalties.

The water treatment pond is an existing site feature with a 40-acre foot capacity. See DEIR Impact 4.8-3 which analyzes the capacity of the water treatment pond and determines that sufficient capacity exists based on the storm events modelled. See also Appendix K.5 detailing Brunswick Industrial Site drainage and stormwater facility sizing. The clay-lined pond does not discharge and is designed to retain sufficient freeboard not to overtop (see page 4.8-73 of the DEIR).

Response to Comment Grp 31-22

The commenter asserts that the DEIR does not analyze the impact of decreased groundwater in the meadow/grassland reach of SFWC or other projected impact areas of the watershed. Please see Master Response 33 - Groundwater Dependent Vegetation; and see Itasca Memo – Simulated Drawdown of Selected Meadows attached to the Final EIR as Appendix H.

Response to Comment Grp 31-23

The commenter asserts that the DEIR does not consider the need to monitor the existing mine seeps on the main stem of Wolf Creek for dewatering impacts. However, the DEIR analyzed dewatering impacts and these impacts were determined to be less than significant after mitigation. Once mine dewatering commences, flow from the mines drains along Idaho-Maryland Road would cease and no monitoring of the existing mine seeps would be possible. (See DEIR, p. 4.8-66.)

Response to Comment Grp 31-24

The commenter asserts that the DEIR does not address the impact to overall development impacts from changing the land use zoning designation. DEIR Chapter 4.9, Land Use and Population and Housing, addresses potential project conflicts with applicable County General Plan land use goals and policies and zoning code requirements. DEIR Section 4.9.2 identified the applicability of Nevada County Ordinance No. 1853 creating the SP zoning district and that the Brunswick Industrial Site was designated M1-SP (see Table 4.9-2 and Figure 4.9-2). As discussed in DEIR Project Description, section 3.8, the applicant has requested a rezone to the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME). The project does not propose to rezone the land to M2 (heavy industrial) and such a rezone is not required for the land use proposed for the project.

As such, land use impacts were analyzed in Chapter 4.9 of the DEIR, and the DEIR specifically analyzed the requested rezone from M1-SP to Light Industrial with Mineral Extraction Combining District. The DEIR concluded that land use impacts would be less than significant. Please see Master Response 1 - Non-EIR/ Administrative Issues regarding quality-of-life concerns.

Response to Comment Grp 31-25

DEIR impact 4.4-2, subsection Wildlife Disturbance, addressed potential noise and nighttime lighting impacts on wildlife populations and found the potential impact less than significant.

Response to Comment Grp 31-26

DEIR Chapter 4.13 addressed the potential for wildfire. DEIR impact 4.13-2 (wildfire) was identified as potentially significant given vegetation that would not be removed surrounding both sites and the use of hydrocarbon-powered equipment. Mitigation Measure 4.13-2 requires the preparation of a vegetation management plan for review and approval by the County Fire Marshall reducing this impact to a less than significant level.

Response to Comment Grp 31-27

The commenter summarizes the comments Grp 31-16 to Grp 31-26 and states that a new DEIR must be prepared and recirculated. The commenter's specific comments are addressed in Responses to Comments Grp 31-16 to Grp 31-26 above. The commenter has not identified a new significant impact that was not addressed in the DEIR; therefore, recirculation is not required. Comment noted.

Response to Comment Grp 31-28

The commenter asserts that the DTSC cleanup project should be analyzed as part of the DEIR so that the existing baseline of the Centennial Site can be analyzed with respect to project impacts. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 31-29

DEIR Chapter 4.4, subsection 4.4.2, provides a detailed characterization of the vegetation communities within the Centennial Industrial Site based on extensive technical studies. Please see Master Response 30 - Technical Study Adequacy. As outlined in DEIR subsection 4.4.2, eight different vegetation communities were identified onsite based on site surveys. These individual vegetation communities were described in the DEIR, including fresh emergent marsh wetland and wet meadow, and the DEIR included descriptions of the special-status species that may occupy these communities. The intent of these descriptions was to provide a general overview of the vegetative community and the special-status species that may utilize this vegetative community and potential impacts that may occur as a result of surface disturbance to this community. Note that white brodiaea and showy milkweed mentioned by commenter are not special-status species.

Response to Comment Grp 31-30

The commenter states that the DEIR provides an inaccurate hydrological assessment of the Brunswick site, ignoring the connectivity of the South Fork Wolf Creek upstream and downstream of the culvert on the Brunswick property, along with the movement of trout and other species. Please see Response to Comment Grp 31-4 and Master Response 34 - Resident Fish.

Previous permitting of the culvert installation and NID spill easement are not environmental issues required to be analyzed in the DEIR for this project.

Response to Comment Grp 31-31

The commenter asserts that the DEIR considers the clay-lined pond to not be an aquatic resource, disregarding impacts on its biological resources. Biological impacts relating to the project's use of the clay-lined pond were addressed in DEIR Section Impact 4.4-3. Please see Response to Comment Grp 31-5.

As stated on page 4-2 of Appendix F.7 of the DEIR, a historic man-made clay lined pond (PD-1) associated with historic saw milling operations does not have a direct outlet or connection to the South Fork Wolf Creek. PD-1 contains a 2-foot clay liner to limit any potential infiltration and receives its water mainly from surface runoff and precipitation. PD-1 is a man-made pond used historically as a recycling pond for site runoff containment and log watering during mill operations.

As stated on page 4.8-30 of the DEIR, the clay-lined pond, constructed in the 1980s, for the former Bohemia Lumbermill, was permitted by the RWQCB through WDRs as a Class II Designated Waste Management Unit, under former Title 23 of the CCR, Subchapter 15, Section 2532. According to the WDRs (Order No. 88-185 for Bohemia Incorporated Grass Valley Mill), the pond was to be lined with a two-foot-thick clay layer having a permeability not to exceed 1x 10-6 cm/s. Vector Engineering found that the "clay liner system was constructed in substantial accordance with the SWRCB Title 23, Subchapter 15, Section 2532 regarding construction of the natural liner system for Class II Designated Waste Management Units." Due to the very low permeability of the existing liner, water contained in the pond does not infiltrate into and support the adjacent wetland meadow.

Response to Comment Grp 31-32

The commenter asserts that the clay-lined pond is a jurisdictional water of the U.S. and must be protected. However, the clay-lined pond is a man-made industrial pond that was created for industrial use and is not connected to South Fork Wolf Creek. Biological impacts relating to the project's use of the clay-lined pond were addressed in DEIR Section Impact 4.4. Please see Response to Comment Grp 31-5.

Response to Comment Grp 31-33

The offsite stream reach (Reach C) referenced by the commenter is outside the project site and will not be subject to project-related surface disturbance. However, potential downstream effects of the project were evaluated in the DEIR. Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Grp 31-34

See Response to Comment Grp 31-33 above.

Response to Comment Grp 31-35

The commenter states that the DEIR contains insufficient observation over time of stream flow. However, the DEIR contains voluminous baseline surface water quality data, including flow of relevant streams. The baseline surface water quality data are described within DEIR Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location.

Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a

"qualifying rain event" of 1.25 inches, and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR.

Further analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 of the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19 of Appendix K.2 of the DEIR, while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18 of Appendix K.2 of the DEIR.

Response to Comment Grp 31-36

The commenter asserts that stream data for South Fork Wolf Creek presented in the DEIR is insufficient. Please see Response to Comment Grp 31-35 above.

Response to Comment Grp 31-37

The commenter asserts that the DEIR contains inadequate study and characterization of mine water discharge, stream flow, sedimentation, stream velocity profiles, loss of seasonality and loss of streambed or bank habitat. Please see Response to Comment Grp 31-35 above and Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge.

Response to Comment Grp 31-38

The commenter asserts that the DEIR failed to address impacts to the SFWC and associated species in stream reach D that runs through Empire Mine State Park. Please see Response to Comment Grp 31-4, Responses to Comment Letter Agcy 1, Master Response 30 - Technical Study Adequacy, Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

It is acknowledged and analyzed in the DEIR impact analysis (see Section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Per the Migratory Deer Ranges Nevada County General Plan map, the project site is located in an area of potential Deer Winter Range. Although this map dates from 1991, that is the most recent map for the local deer range that CDFW has published. The project site does not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas. Any deer within or adjacent to the project site would move outside the project site to the remaining forest surrounding the site and would be uninhibited to move into and out of the project site and the areas outside the project site. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it less than significant.

Response to Comment Grp 31-39

The commenter states that the DEIR should focus on Benthic Macroinvertebrates, but does not provide any specific comment on how the project could have an adverse impact. Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master

Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. CDFW conducted a thorough review of the DEIR and submitted a comment letter on the DEIR (letter dated April 4, 2022). CDFW also conducted electrofishing within three stretches of the South Fork Wolf Creek to identify native fish populations downstream of the proposed discharge (Memorandum report dated March 23, 2022). CDFW did not make any comments on the project's potential impacts to BMI and they only identified two non-native fish species downstream of the proposed discharge point within the Brunswick site. CDFW is concerned with impacts to riparian vegetation and fish and amphibian populations downstream, but did not mention BMI as a concern in either their comment letter or electrofishing Memorandum. The Project Applicant must adhere to the NPDES discharge limits within South Fork Wolf Creek, which would minimize any potential impact to downstream aquatic resources.

Response to Comment Grp 31-40

Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding the impacts to fish, discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. There are no US EPA water quality criteria for the protection of aquatic life for electrical conductivity, total dissolved solids, and sulphate (See page D-34 of Order R5-2022-0006). However, the secondary MCL for Electrical conductivity of 900 umhos/com is the recommended level for the protection of agricultural supply by the Central Valley Water Board (See page D-34 and D-35 of Order R5-2022-0006). As discussed on page 4-5 of Appendix K.4, electrical conductivity (EC) is associated with Total Dissolved Solids (TDS). Appendix K.2 listed EC values for the New Brunswick Shaft water as approximately 385 µS/cm. The mobilized divalent ions from the carbonate and sulfide minerals would add to that specific conductance, although it would require significant contributions of Ca, Mg, and SO4 to surpass the NPDES CAG995002 screening level of 900 uS/cm. However, if treatment is deemed necessary for TDS mitigation at some point during mining operations through required water quality monitoring (see Mitigation Measure 4.8-1(a)), it is Linkan's opinion that mobile ion exchange water softeners should be deployed as compared to building additional permanent infrastructure that may not be needed or only needed for relatively short periods. These mobile units are readily available, and various vendors offer the service of replacing them as necessary as the resin becomes spent and in need of regeneration. Additionally, the resins used for these constituents are common throughout the industry for softening water and do not pose a health or environmental risk. Therefore, the proposed water treatment plant is capable of ensuring that conductance of discharged mine water meets water quality goals and the required Notice of Applicability would ensure compliance (see Master Response 35 – Discharge to South Fork Wolf Creek).

Response to Comment Grp 31-41

The commenter asserts that the DEIR contains errors in identification of species, typographical errors and incomplete identifications. As the DEIR contains thousands of pages of information, a small number of typographical errors can be expected, and as stated by California Courts, "[t]he need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (Laurel Heights Improvement Assn., supra, 47 Cal.3d at p. 406.). The project sites have been field checked many times by qualified biologists and botanists and a complete plant species list, including native plants, is included in the appendices of the DEIR. Please see Appendix F.2, F.6, F.9, F.11 of the DEIR and Master Response 30 - Technical Study Adequacy. The reference to Populus tremuloides is an



error in the report. Page 4.4-9 of the DEIR has been corrected in the FEIR as set forth below (additions in underline, deletions in ~~strikeout~~):

> The montane riparian in the placer diggings and areas created from earth movement are characterized by ~~black~~Fremont cottonwood (Populus ~~tremuloides~~ fremontii ssp. fremontii), red willow (Salix laevigata), arroyo willow (Salix lasiolepis), and occasionally ponderosa pine in the overstory.

The species of pine referred to on page 4-4-10 of the DEIR is Ponderosa Pine. Page 4.4-10 of the DEIR has been corrected in the FEIR as set forth below (additions in underline, deletions in ~~strikeout~~):

> The montane riparian vegetation along both sides of the South Fork Wolf Creek is dominated by white alder (Alnus rhombifolia), red willow (Salix laevigata), and arroyo willow (Salix lasiolepis), with other overstory species from adjacent vegetation types, including California black oak, Ponderosa pine and Douglas fir.

This minor error and clarification in species name in the DEIR and appendices does not affect the impact determination included in the EIR.

Response to Comment Grp 31-42

The commenter notes that the California spotted owl is under review as an endangered species by the USFWS; however, the USFWS determined that listing was not warranted on 11/8/2019, and there are no pending listing petitions for the species. Please see Master Response 37 - Birds and Raptors.

Response to Comment Grp 31-43

Please see Master Response 37 - Birds and Raptors, regarding the Yellow-breasted chat.

Response to Comment Grp 31-44

Please see Master Response 37 - Birds and Raptors, regarding the Willow flycatcher.

Response to Comment Grp 31-45

Please see Response to Comment Grp 31-10.

Response to Comment Grp 31-46

Please see Master Response 30 - Technical Study Adequacy and Master Response 31 - Rare Plants.

Response to Comment Grp 31-47

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding impacts to amphibian species.

Response to Comment Grp 31-48

The commenter asserts that the DEIR did not adequately survey for presence of Western Pond Turtle, and does not consider loss of stream bank habitat due to higher stream levels, or properly protect turtle hatchlings. DEIR Impact 4.4-2 analyzed potential impacts to Western Pond Turtle and concluded a potentially significant impact may occur. Mitigation Measure 4.4-2(b) requires a preconstruction survey by a qualified biologist no more than seven days prior to proposed disturbance of perennial waters on the project site. While the project would discharge up to 5.6

cfs into South Fork Wolf Creek, peak flows from the site during storm events are expected to be lower than under baseline conditions due to the construction of a stormwater detention pond on the Brunswick site. As such, the peak flows are expected to be within or less than the same range as currently exist, resulting in a less than significant impact related to Western Pond Turtle habitat due to stream level (see DEIR Impact 4.8-3). Potential downstream impacts to the stream channel and associated riparian zone along both sides of South Fork Wolf Creek from the additional discharge of 5.6 cfs would be minimal on such sensitive biological resources and do not represent a potential significant impact to the stream channel or associated riparian zone within South Fork Wolf Creek (See page 9 of Appendix F.10 and Master Response 36 - Flows in South Fork Wolf Creek).

Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge regarding treated water discharge to South Fork Wolf Creek and the limited potential for impacts to the stream bank.

Response to Comment Grp 31-49

The commenter asserts that the DEIR did not include bat surveys and did not consider the impacts of bat habitat loss. However, the DEIR (see Impact 3.4-4) conservatively concludes a potential impact to bat species despite determining bat species have a low likelihood of occurring onsite. Mitigation Measure 4.4-2(f) provides extensive detail regarding a required survey for bats that must occur prior to site disturbance, and specifically requires that surveys shall occur no more than seven days prior to surface disturbance. Mitigation Measure 4.4-2(f) also specifies reporting requirements if bats are not found, passive removal if bats are identified, and avoidance until breeding roots have dispersed. This mitigation measure allows for potential bats to be identified, prevented from returning to disturbance areas, and/or avoidance of bats to limit the potential for impact. As a result, this impact was considered less than significant following mitigation. The commenter also asserts that the DEIR does not analyze loss of woodland and riparian habitat; however, the DEIR acknowledges that "On the Brunswick Industrial Site, approximately 18.7 acres of forested areas (Montane Hardwood-Conifer, Montane Hardwood, Ponderosa Pine, and Sierran Mixed Conifer vegetation communities) would be disturbed and trees would require Removal … [and] [o]n the Centennial Industrial Site, up to approximately 5.3 acres of forested areas (Montane Hardwood-Conifer and Montane Hardwood vegetation communities) would be disturbed and trees would require removal." (DEIR p. 4.3-59.) Further, the DEIR acknowledges that the project could have significant impacts on riparian habitat and provides mitigation to reduce those potential impacts. (See DEIR, p. 4.4-87.) The project does not have a significant permanent impact on Riparian habitat, and the loss of approximately 24 acres of forested areas is insignificant compared to the acreage of forested lands within Nevada County. Accordingly, the project's impacts to forested lands and riparian habitats would not cause significant impacts to bats or bat habitat.

Response to Comment Grp 31-50

The commenter asserts that Cooper's Hawk and Olive-sided Flycatcher could be impacted by the project and were not properly considered in the DEIR. Please see Master Response 37 - Birds and Raptors.

Response to Comment Grp 31-51

The commenter asserts that more biological surveys need to be completed in order to identify every species that could potentially be on site. Identification of potential special-status species was based on a 5-mile radius search of the CNDDB database, site surveys by qualified local

biologists, and local knowledge of habitats and species that may occupy those habitats. Also, consistent with the County's independent biology expert's comments, the DEIR requires preconstruction surveys to identify species that may not have been identified on the project site as part of the DEIR process. Accordingly, the biology analysis was prepared by local experts, was peer reviewed by the County's independent expert, who found the analysis to be adequate after incorporation of that expert's revisions. Please see Master Response 30 - Technical Study Adequacy and Master Response 31 - Rare Plants.

Response to Comment Grp 31-52

The commenter generally asserts that the biological resources analysis and mitigation is inadequate. The commenter's specific assertions are addressed below in Responses to Comments Grp 31-53 through Grp 31-62.

Response to Comment Grp 31-53

The commenter raises concerns that Mitigation Measure 4.4-1(a), which requires a habitat management plan for Pine Hill flannelbush impacts, does not contain sufficient detail. Mitigation measure 4.4-1(a) provides the requirements the management plan must include in order to be approved by the County and some of the performance and success criteria that should be included in the management plan. Mitigation measure 4.4-1(a) is not intended, nor required, to have every detail of the management plan, which is a separate document. The mitigation measures, consistent with the requirements of CEQA, provides clear standards, timeframes, and responsibility such that mitigation measure can be enforced by the County. Follow up special-status plant species surveys were conducted the last two weeks of June 2022 within the project area, including areas impacted by the 2021 fire that occurred within the Centennial site, and flannelbush seedlings were documented growing in a very small portion of the area impacted by fire within the Centennial site. No other special-status plant species were identified within the areas impacted by fire or within the overall project site. Given the USFWS does not consider any flannelbush species in Nevada County to be the listed variety (as stated in their 2019 5-year review of the species), an ESA consultation would not be required with the agency as part of the approval and permitting of the project. However, coordination with CDFW regarding the flannelbush will occur as part of the project and the implementation of Mitigation Measure 4.4-1(a) should be adequate with the agency given they had no recommendations for further mitigation for the species as part of their DEIR comment letter dated April 4, 2022.

Response to Comment Grp 31-54

Please see Response to Comment Grp 31-10. Please see Master Response 37 - Birds and Raptors, regarding Yellow-breasted Chat and Willow Flycatcher.

Response to Comment Grp 31-55

Please see Response to Comment Grp 31-5.

Response to Comment Grp 31-56

Please see Master Response 34 - Resident Fish. Please see Response to Comment Grp 31-12 regarding Benthic Macroinvertebrates. Please also see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

The proposed project will have no impact on migratory fish. As stated in the CDFW's Memorandum (dated March 23, 2022), which details electrofishing at three locations downstream of the Brunswick site, the areas upstream closest to the Brunswick site were found to have brown trout with poor body conditions. CDFW stated that ideal spawning and rearing habitats for brown trout, a non-native fish species in California, are located further downstream and that some fish may migrate up into the areas closer to the Brunswick site. The Brunswick site will not inhibit any movement of fish from below the project site to upstream of the project site given the stream will continue to flow from upstream, through the Brunswick site, and then downstream of the Brunswick site as it currently functions. As stated on page iii of Appendix H.1 of the DEIR, the existing culvert that conveys water through the Brunswick site appears to be approaching the end of its lifespan and is recommended for replacement. The replacement of this culvert by the proposed project will therefore improve fish passage, as the existing culvert is degraded, and could fail without replacement, which would sever connectivity and likely result in subsequent substantial erosion as the flow sought another path.

Response to Comment Grp 31-57

The commenter asserts that the mitigation provided in the DEIR for special-status species is insufficient because it allows disturbance once the habitat is no longer occupied and does not consider avoidance. However, habitat for the special status species with a potential to occur onsite is not by itself protected by the California Endangered Species Act or Federal Endangered Species Act. Rather, the species themselves are protected and habitat for those species require protections only when occupied. However, Mitigation Measures 4.4-2(a), through 4.4-2(f) require consultation with the respective state or federal agencies for determination of appropriate avoidance and minimization measures. As discussed in DEIR Impact 4.4-2, special-status species impacts, including potential loss of habitat, was analyzed. This impact was considered potentially significant and the DEIR required preconstruction surveys for species, even species not observed onsite during surveys, prior to surface disturbance. In the event a special-status species is identified during preconstruction surveys, the mine operator is required to consult with state and/or federal agencies regarding how, where, when, and by whom those species can be relocated. Moreover, the County's independent biology expert reviewed the proposed mitigation measures and found the measures to be adequate to reduce impacts to a less than significant level.

Response to Comment Grp 31-58

The Centennial site cleanup project is a separate project. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

The commenter suggests that compensatory mitigation or payment of in-lieu fees is not a reasonable mitigation strategy. However, these mitigation strategies are widely used and accepted. Avoidance of the onsite wetlands that are proposed to be removed is not feasible due to project design constraints and the need to use the clay-lined pond for water treatment purposes. As shown on Figure 4.4-4 of the DEIR, the Brunswick site has small artificial wetlands dispersed throughout the project area which have formed in depressions created by previous disturbance on the site. The retention of these wetlands (MA-1, MA-2, MA-3, MA-4, MA-5, MA-6, WM-A, WM-2, WM-3, RI-4) would prevent the construction of most of the proposed buildings, the storm water detention pond, and the engineered fill pile and therefore would be infeasible. Large natural wetlands (WM-3, RI-2, and RI-3) are preserved by the project design. Mitigation Measure 4.4-3(c & d) provides a series of compensatory mitigation options that will be negotiated during the section 404 and 1600 permitting process. The mitigation option identified and ratios at which mitigation is required is based on consultation and approval by state and federal agencies involved in the

permitting process. For clarification, Mitigation Measures 4.4-3(c & d) shall be revised to reflect that the minimum mitigation ratio for compensatory mitigation shall be 1:1, and higher ratios may be implemented if required by the agency issuing the respective permit. Please see Response to Comment Grp 31-14.

Response to Comment Grp 31-59

The commenter asserts that the DEIR omits discussion of wetland and riparian habitats on the Centennial Site in their existing condition. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Grp 31-60

The commenter cites language from Mitigation Measure 4.4-3(c) for the proposition that the DEIR did not consider avoidance of wetlands. However, the commenter omits language in that mitigation measure that specifically calls for consideration of avoidance if feasible, as follows "To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. As such, the mitigation provided already calls for avoidance where feasible. The commenter asks that the County consider an alternative that avoids wetlands. As shown on Figure 4.4-4 of the DEIR, the Brunswick site has small artificial wetlands dispersed throughout the project area which have formed in depressions created by previous disturbance on the site. The retention of these wetlands (MA-1, MA-2, MA-3, MA-4, MA-5, MA-6, WM-A, WM-2, WM-3, RI-4) would prevent the construction of most of the proposed buildings, the storm water detention pond, and the engineered fill pile and therefore would be infeasible. Large natural wetlands (WM-3, RI-2, and RI-3) are preserved by the project design. Additionally, the commenter asks whether onsite or offsite wetland creation could be considered. The Project Proponent could consider offsite creation of wetlands as part of specific wetlands mitigation in consultation with the Corps or CDFW, but no specific offsite mitigation site is currently under consideration. For example, the large natural wetlands on the property discussed above could be enhanced and/or permanently protected Please see Responses to Comments Grp 31-57 and -58 above.

Response to Comment Grp 31-61

The commenter asserts that impacts to South Fork Wolf Creek have not been assessed. Please see Response to Comment Grp 31-4, Master Response 36 - Flows in South Wolf Creek and Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Additionally, the commenter asserts that the clay-lined pond (PD-1) is connected to South Fork Wolf Creek; however, this is not correct. The clay-lined pond is a man-made industrial pond that was created for industrial use and is not connected to South Fork Wolf Creek. Please see Response to Comment Grp 31-31. Biological impacts relating to the project's use of the clay-lined pond were addressed in DEIR Section Impact 4.4. Please also see Response to Comment Grp 31-5.

Response to Comment Grp 31-62

The commenter asserts that encroachments into the 100-foot setback from streams has not been addressed in the DEIR. However, the encroachment was specifically addressed in the DEIR. Please see Response to Comment Grp 31-15 regarding the necessary encroachment and analysis. As stated on page 4.4-86 of the DEIR, the proposed treated mine water discharge pipe is an aboveground pipe that would be located along an existing access road on the south side of

South Fork Wolf Creek. The existing access road crosses the ephemeral stream feature E-1. A support structure would be constructed across the ephemeral stream (E-1) so that the pipe crosses over the two-foot-wide stream instead of through the stream, which may cause a temporary impact to approximately 16 linear feet of the stream. Riparian vegetation, if present along the existing access road, may be impacted from placement of the discharge pipe. The pipeline has been routed along an existing access road to minimize the potential impacts to riparian environments, as well as the 50-foot non-disturbance buffer of the ephemeral stream (pursuant to Nevada County LUDC Section L-II 4.3.17).

The commenter suggests that the existing road where the discharge pipe will be placed is inhabited by trillium, equisetum, and rattlesnake plantain orchid. However, none of these plants are special-status plants. Therefore, any disturbance, assuming they were located on parts of the existing road where the proposed treated mine water discharge pipe would be placed, would not be a significant impact under CEQA.

Response to Comment Grp 31-63
Please see Response to Comment Grp 31-16.

Response to Comment Grp 31-64
Please see Response to Comment Grp 31-17.

Response to Comment Grp 31-65
Please see Response to Comment Grp 31-18.

Response to Comment Grp 31-66
Please see Response to Comment Grp 31-57.

Response to Comment Grp 31-67
DEIR Impact 4.4-3 analyzed the projects potential to impact state or federally protected waters and wetlands and determined this impact was potentially significant. Surface disturbance on the Centennial Industrial Site has the potential to impact approximately 0.033-acre of ephemeral streams. Mitigation measures 4.4-3(a-d) were identified that reduce this impact to a less than significant level. Surface disturbance on the Brunswick Industrial Site has the potential to impact approximately 0.57-acre of wetlands and 293 linear feet (0.103-acre) of mapped streams. This insignificant reduction in wetlands would not result in cumulatively considerable impacts to wetland and associated species viability in the region, as discussed in Impact 4.4-6 of the DEIR.

Response to Comment Grp 31-68
Please see Response to Comment Grp 31-21.

Response to Comment Grp 31-69
Please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Grp 31-70
Please see Response to Comment Grp 31-23. Once mine dewatering commences flow from the mines drains along Idaho-Maryland Road will cease and no monitoring of the existing mine seeps would be possible. It is not possible for groundwater seeping into dewatered mine workings to flow out of the existing mine drains.

As discussed on page of Appendix K.2 of the DEIR, the restoration of the post-mining discharge through the drains would be comparable to existing conditions and, thus, not an impact under CEQA. However, once the mine discharge from the drains resumed, compliance measures may

be required by RWQCB to address the Basin Plan, antidegradation, and other water quality standards. These measures might include sealing off areas of the underground workings that are the primary source of arsenic in the existing drain water, sealing the underground workings sufficiently to prevent seepage of water from the connected mine workings, obtaining an Individual NPDES permit upon closure, or treating of the mine water seeps after closure.

Response to Comment Grp 31-71

The commenter alleges that the DEIR does not address the impact of changing the land use zoning designation from light industrial to heavy industrial/mining. The commenter mischaracterizes the rezone application, however, as the existing zoning for the Brunswick site is Light Industrial, Site Performance Combining District, and would be rezoned to Light Industrial with Mineral Extraction Combining District to allow for surface mining facilities. The commenter's statement that the rezone changes the zoning to heavy industrial is incorrect. Moreover, the existing zoning already allows for industrial-type uses such as lumber yards, auto dismantling yards, large wholesaling and distribution facilities, and other industrial uses. The primary change in the zoning categories is that the new zoning allows surface mining uses in connection with underground mining, for which the impacts are specifically addressed in the DEIR. The commenter does not identify any specific impacts that would occur due to the change in zoning, but merely speculates that such impacts may occur. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." The rezone would allow light industrial uses similar to those already allowed under the existing light industrial zoning, and the additional permitted uses associated with the mineral extraction zone combining district have already been analyzed in the DEIR. Accordingly, no further analysis is required. Please see Response to Comment Grp 31-24.

Response to Comment Grp 31-72

Please see Response to Comment Grp 31-25.

Response to Comment Grp 31-73

Please see Response to Comment Grp 31-26 and Master Response 6 - Wildfire. The commenter alleges that the project may be inconsistent with the California Wildfire and Forest Resilience Action Plan, but does not provide any specific examples. The California Wildfire and Forest Resilience Action Plan does not have any specific mandates that apply to the project, and moreover, the DEIR concluded that the project's wildfire impact was less than significant after mitigation.

With respect to climate change, there is no uniform consensus on how climate change will affect wildfire patterns, so analysis based on varying climate change predictions would be speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As analysis of climate change scenarios, when there is no consensus on how climate change will affect the project site, would be speculation, this analysis is not required by CEQA. Please see Master Response 16 – Drought and Climate Change.

Response to Comment Grp 31-74

This is a summary comment of the comments previously addressed. Please see Responses to Comments Grp 31-1 through Grp 31-73.

Response to Comment Grp 31-75

This is a summary comment of the comments previously addressed. Please see Responses to Comments Grp 31-1 through Grp 31-73

Group Letter 32

To: Members of the Nevada County Planning Commission,
Nevada County Board of Supervisors,
and Nevada County Planning Department Staff
Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
matt.kelley@co.nevada.ca.us
To All Concerned:



Summary Comments on the Draft Environmental Impact Report (DEIR) for the proposed Idaho Maryland Mine project[1]

32-1 As a community-based environmental organization Wolf Creek Community Alliance (WCCA) has worked to monitor, protect and restore the Wolf Creek Watershed since 2004. The Wolf Creek headwaters in which this proposed project would take place is a crucial component of our watershed. We at Wolf Creek Community Alliance are concerned that the DEIR is deficient in a number of ways.

Two general comments -

Chapter 4.5 Cultural & Tribal Resources

32-2 We are surprised that the cultural resources identified in the draft are all mining sites. Not a single pre-mining site is identified, in spite of archeological sites well-known to the State Park existing in the Area of Potential Impacts, and public maps showing the existence of Nisenan village sites on both the South Fork Wolf Creek and Wolf Creek itself. That the report simply records outreach to tribes without succeeding in actually consulting with them speaks more to the failure of the draft than to the absence of knowledge of important sites on the part of tribal communities. The draft needs to more adequately survey for archeological and traditional tribal sites and fully consult with local tribes.

Biological Resources - Section 4.4.2 Environmental Setting

32-3 Second, the environmental setting should be framed more accurately. The proposed project sits within areas with some of the highest biological diversity in the county. A network of undeveloped land provides heavily used wildlife corridors and rare refugia for significant species. Aquatic resources continue to provide crucial ecological function to the watershed downstream. Instead of being characterized primarily as 'disturbed industrial zones' suitable only for further development, they more accurately should be seen as biological resources that, though damaged by a long history of mining, continue to be resilient and over time have shown a remarkable ability to recover. SFWC is a perennial stream starting above Brunswick Road not out of a metal culvert. The pond there is not a mere collector of storm water, but a consequence of the natural hydrology of the valley, and currently a productive biological resource. The wetland habitats at the Centennial site that the draft seeks to ignore by setting a poorly defined future baseline are important hydrologically for the headwaters and contain species of special concern.

[1] More detailed comments with citations to follow.

32-4 Further, as the proposed permit is for 80 years, into the 22nd century, considerations of impacts should be fully analyzed for predicted and probable changes we will see due to drought, wildfire and climate change in those 80 years. Given the severity of that future, the criteria should be not just to minimize the negative impacts, but to ensure the continued recovery and resilience of biological functions crucial to our future. The draft does none of this and ignores future considerations as if we live in a static universe.

32-5 Regarding the details in **Biological Resources,** chapter 4.4, we see 5 areas where the impact designation should be changed from **less than significant (LS)** to **significant (S)**, or from **less than cumulatively considerable (LCC)** to **cumulatively considerable (CC)**.

32-6 **Mitigation 4.4-1 - Special Status Plant Species**. The draft does not adequately address potential impacts to stebbins morning glory, chaparral sedge, finger rush, and sierra brodiaea. The management plan to protect the endangered Pine Hill flannelbush also fails to protect that species. Botanical surveys did not take place during blooming seasons and dismissed probable occurrence in spite of suitable habitat. Pine Hill flannelbush management does not incorporate sufficient buffers, plans for treatment with prescribed burning, or study to show that transplanting would be successful, all details that the Recovery Plan for Gabbro Plants of the Central Sierra Nevada require. **The level of impact should be changed to significant.**

32-7 **Mitigation 4.4-2 - Special Status Wildlife Species.** The draft does not consider impacts to Monarch Butterfly and showy milkweed, present at the Centennial site, or Yellow-breasted Chat and California Spotted Owl, present close to the Brunswick site. It also fails to adequately consider impacts to Foothill Yellow-legged and Red-legged Frog, Western Pond Turtle, Cooper's Hawk, Willow Flycatcher, and Olive-sided Flycatcher. Surveys are inadequate and mitigations for impacts to Western Pond Turtle and raptors do not adequately protect breeding habitat. **The level of impact should be changed to significant.**

32-8 **Mitigation 4.4-3 Riparian Habitat, Wetland, and other Sensitive Communities.** The draft does not include the full length of South Fork Wolf Creek or the Pond at the Brunswick site for its aquatic or biological resources. It also excludes impacts to wetlands as they currently exist at the Centennial site. It does not adequately address impacts downstream to South Fork Fork Creek due to dewatering. Whole reaches of South Fork Wolf Creek are not studied for basic hydrology or biological resources. Benthic Macroinvertebrates (BMI) are not collected for study. Changes to seasonality of stream flow, water temperature, and habitat for BMI are not considered. Conclusions about the potential for increased sedimentation are questionable and not supported with sufficient data. The drawdown of the water table due to dewatering is underestimated and its impacts to meadow, wetland, and forest habitats not considered. **The level of impact should be changed to significant.**

32-9 **Mitigation 4.4-4 Movement of Native Fish or Wildlife.** By not characterizing perennial reaches of South Fork Wolf Creek as being aquatic resources, the DEIR neglects to consider the movement of fish and other aquatic species within the full length of the stream. **The level of impact should be changed to significant.**

32-10 **Mitigation 4.4-6 Cumulative Impacts.** The DEIR does not address loss of forest or wildlife habitat, or cumulative impacts due to chronic stress for species, air quality, noise, risk of system failure over time,

wildfire, and climate change. **The level of impact should be changed to cumulatively considerable.**

Finally we are concerned how the DEIR deals with the long-term impacts of the project.

APPENDIX C Reclamation Plan 5.12. Removal and Closure Activities fail to address how Rise Gold will protect the community from heavy metal contamination once the mining company has ceased operations, which could happen in 6 months or 80 years. There is no plan and no way to mitigate for the leaking effluent that inevitably leaks from the underground tunnels into the creeks.

When sulfides, which co-occur with gold, contact water and air, they form sulfuric acid which leaches heavy metals from the rocks: arsenic, manganese, iron, cadmium, and lead are the leading toxins. When the mines close, tunnels fill with water, eventually bust loose somewhere, and begin draining into the creeks, in difficult to predict places. Acid mine drainage is considered the most serious threat to streams. It doesn't matter how "green" the mining process is, as long as the tunnels fill with water, they will leach toxic metals.

32-11

The Idaho Maryland Mine, Empire Mine, and North Star mines operated for about 100 years. Today, sixty-eight years after the mines closed in Grass Valley, the community and environment are still paying for what happens after the mines closed. There are brownfields sites all over the County from hard rock mines. Magenta Drain, the Drew tunnel, Little Wolf Creek are 3 examples that have been toxic to the soil and water and very expensive to clean up and treat.

The Idaho Maryland mine is currently draining water into Wolf Creek, out of four sites on Idaho Maryland Rd, with arsenic and manganese levels above the acceptable range for recreational waters according to State standards.

This water will need to be treated forever. Mine tunnels will fill, rupture, leak, and leach heavy metals forever. We can't predict when or where. There is no plan in place to address this issue in the DEIR. We think it is an unavoidable significant impact. This expensive problem and the reasons above and from my colleagues should be enough reason not to grant a permit to Rise Gold.

32-12

Based on these concerns, both general and specific, we feel that the DEIR is inadequate and does not address the real impacts of the proposed project.

Thank you,

Jonathan Keehn, President Josie Crawford, Executive Director
BJ Schmitt, Board Member Gary Grifith, Board Member

Wolf Creek Community Alliance
http://www.wolfcreekalliance.org
P.O. Box 477, Grass Valley, CA 95945
(530) 272-2347 / wolf@wolfcreekalliance.org

GROUP LETTER 32: JONATHAN KEEHN, WOLF CREEK COMMUNITY ALLIANCE

Response to Comment Grp 32-1

This is an introductory comment. The commenter generally states the DEIR is deficient. Responses to specific comments are provided below.

Response to Comment Grp 32-2

The commenter is surprised no pre-mining cultural sites are identified in the DEIR on the project sites. As explained in Impact 4.5-2 of the DEIR, a site-specific cultural resources survey was conducted by a qualified archeologist meeting the Secretary of the Interior's Professional Qualification Standards. This included outreach to the Native American Heritage Commission, surrounding Native American tribes and historical entities, and the Nevada County Landmark Commission, as well as a pedestrian survey on May 9 and 10, 2019, using 20 meter transects (see DEIR pages 4.5-19 – 21). The analysis, conclusion, and mitigation measure in Impact 4.5-2 was based on this extensive site-specific analysis and broad outreach and reflects the judgment of professional experts in the field and the best available information.

Response to Comment Grp 32-3

The commenter states the proposed project sits within areas with some of the highest biological diversity in the county with wildlife corridors and rare refugia for significant species and aquatic resources provide crucial ecological function to the watershed downstream. The commenter is referred to sections 4.4 and 4.8 of the DEIR which describes the environmental setting and analyzes project impacts to biological and aquatic resources.

The commenter states that South Fork Wolf Creek is a perennial steam starting above Brunswick Road. The DEIR, including Appendix F.7, identifies the onsite portion of South Fork Wolf Creek as perennial. The upstream portion of South Fork Wolf Creek is offsite and would not be impacted by the project.

The commenter states that the pond is the consequence of the natural hydrology of the valley and is a productive biological resource. The DEIR, and Appendix F.7, both identify the onsite pond as a man-made clay-lined pond that was associated with historic saw milling operations. The pond is a non-jurisdictional "water of the United States" but may be considered a "water of the State of California." Special-status species that may use the pond and surrounding habitat were considered in Impact 4.4-2. This impact was considered potentially significant but reduced to a less than significant level with mitigation. Mitigation covered a variety of special-status species and requires preconstruction surveys, potential state and federal permitting, implementation of avoidance and protection measures, and preparation of management plans. Impacts to "waters" was considered in DEIR Impact 4.4-3. This impact was considered potentially significant but reduced to a less than significant level with mitigation. Mitigation included additional state and federal permitting and preparation of management plans.

The commenter states that wetland habitats at the Centennial site are ignored by setting a poorly defined future baseline. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Grp 32-4

Please see Response to Comment Grp 31-16.

Response to Comment Grp 32-5

The commenter states that 5 areas in Chapter 4.4 of the DEIR should be changed to significant impacts. Responses are provided to specific comments below.

Response to Comment Grp 32-6

This comment summarizes comments made by this commenter in other letters.

Regarding Stebbins morning glory, chaparral sedge, finger rush, and sierra brodiaea. Please see Response to Comment Grp 31-46.

Regarding Pine Hill Flannel bush, please see Response to Comment Grp 30-40, 31-9, and 31-53.

Response to Comment Grp 32-7

This comment summarizes comments made by this commenter in other letters.

Please see Master Response 37 - Birds and Raptors, regarding yellow-breasted chat, copper hawk, Olive-sided flycatcher and Willow flycatcher and protection of breeding habitat for raptors.

Regarding showy milkweed and the monarch butterfly, please see Response to Comment Grp 31-45 and 31-10.

Regarding the California spotted owl, please see Response to Comment Grp 31-42 and 31-10.

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding impacts to amphibian species.

Regarding Western Pond Turtle, please see Response to Comment Grp 31-48.

Response to Comment Grp 32-8

This comment summarizes comments made by this commenter in other letters.

Regarding study of the full length of South Fork Wolf Creek, please see Responses to Comments Grp 31-33 and Grp 31-34.

Regarding the aquatic and biological resources of the pond at the Brunswick site, please see Response to Comment Grp 31-5.

Regarding wetlands at Centennial site and project baseline, please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Regarding benthic invertebrates, please see Responses to Comments Grp 31-12, Grp 31-39, and Grp 31-40.

Regarding increased sedimentation, please see Master Response 36 - Flows in South Fork Wolf Creek.

Regarding impacts to meadows, wetland, and forests from mine dewatering, please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Grp 32-9

This comment summarizes comments made by this commenter in a separate letter. Please see Response to Comment Grp 31-56.

Response to Comment Grp 32-10

This comment summarizes comments made by this commenter in other letters. Please see Responses to Comments Grp 31-63 through Grp 31-66.

Response to Comment Grp 32-11

The commenter states that heavy metal contamination would occur once mining has ceased, the mine is flooded and drainage from the mine recommences. As stated on page 4.8-51 of the DEIR, after mining is completed, and as underground mine workings fill with groundwater, water from the underground mine workings would begin to seep from the existing drains. The water that would seep from the underground workings is anticipated to have similar water quality to the water that currently discharges from the existing drains. Specifically, it may contain elevated levels of iron and manganese. Therefore, the conditions after mining is completed would be similar to existing, or baseline, conditions, such that re-activation of the seeps would not represent a potentially significant impact under CEQA. Although part of the existing environmental setting, some of the seeps have elevated arsenic levels that could pose a threat to human health or the environment. However, despite these existing discharges from the drains, the reported concentrations of all metals and other constituents in the Wolf Creek samples are well below the NPDES water quality standards. Please also see Master Response 8 - Mine Waste Characterization.

Response to Comment Grp 32-12

The commenter states the DEIR is inadequate. Responses to specific comments are provided above.

Form Letter A 1

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/16/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Gold mines creates a lot of waste that can contain toxic substances that threaten to pollute groundwater and surface waters. My personal reasons to oppose the Gold Mining is my and my family health, my property value decrease.

A 1-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: ANASTASIA OSLING

Address: 155 Success Mine Loop
Grass Valley, CA 95945

Phone number: (530) 446-6691

Email: Mizzsolaris@gmail.com

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 1: ANASTASIA OSLING

Response to Comment A 1-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to the pollution of groundwater and surface water, please refer to Impact 4.8-1 in Chapter 4.8, Hydrology and Water Quality, of the DEIR, which provides a detailed analysis of whether the project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Please also see Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 2

Dist 3

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2/16/2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 2-1 The Gold Mining in Grass Valley will create a lot of waste that contain toxic substances that threaten to pollute ground and surface waters.
My personal reason to oppose the Gold Mine is my / my family health and my property value going down.
Do not open the Idaho - Maryland Mine.

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Anastasia Osing

Address: 155 Success Mine Loop
Grass Valley, CA 95945

Phone number: (530) 446-6691

Email:

FORM LETTER A 2: ANASTASIA OSLING

Response to Comment A 2-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to the pollution of groundwater and surface water, please refer to Impact 4.8-1 in Chapter 4.8, Hydrology and Water Quality, of the DEIR, which provides a detailed analysis of whether the project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Please also see Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 3-1

If opening a mine here is a good idea, someone locally or within CA or USA would have done this long ago. So I object to it happening at all and certainly not by a company from outside the U.S. Rise Gold also has litigation against them which doesn't make them sound like a company to be trusted with our local, valuable assets.

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Barbara Brown

Name: BARBARA BROWN

Address: 251 Willow Valley Rd #14, Nevada City

Phone number: 530-265-6027

Email: barbara95959@gmail.com

RECEIVED
JAN 28 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER A 3: BARBARA BROWN

Response to Comment A 3-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 4

Dist 1

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

EACH SUPERVISOR REC'D

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/15/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 4-1

As a native of Nevada City and as a homeowner here, I oppose the reopening of the mine for reasons of quality of life. There will be more air pollution with the increase of dust and traffic. I'm afraid the project will lead to blight both environmentally and socially. Please vote NO!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: CARLETON FORSMAN

Address: 12952 Forsman Pl. Nevada City 95959

Phone number: 415-305-9383

Email: Catzforsman@gmail.com

FORM LETTER A 4: CARLTON FORSMAN

Response to Comment A 4-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter A 5

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 18 January 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

WHERE DO YOU THINK THE WATER will come from since were possibly in continuous DRAUGHT ?
DO YOU Really THINK the WATER will be safe to recycle?
Noise !!! Explosions Large commercial trucks in our Our quality of life will never be the same !

A 5-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: CARMEN Riley

Address: 355 North church St GV 95945

Phone number: 530. 272.2803

Email: redlavacade@yahoo.com

RECEIVED
JAN 29 2022

FORM LETTER A 5: CARMEN RILEY

Response to Comment A 5-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regards to concerns about drought, please see Master Response 16. With regard to concerns about noise pollution, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Form Letter A 6

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 18 January 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

WHERE DO YOU THINK THE WATER IS COMING FROM SINCE WE'RE POSSIBLY IN CONTINUED DRAUGHT?!
DO YOU REALLY THINK THE WATER WILL BE SAFE TO RECYCLE?
NOISE!!! CONSTANT EXPLOSIONS
OUR QUALITY OF LIFE WILL NEVER BE THE SAME!

A 6-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: CARMEN RILEY

Address: 355 NORTH CHURCH ST GV 95945

Phone number: 530.272.2803

Email: redlarkcache@yahoo.com

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 6: CARMEN RILEY

Response to Comment A 6-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regards to concerns about drought, please see Master Response 16. With regard to concerns about noise pollution, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Form Letter A 7

Dist 1

RECEIVED
JAN 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan 19, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 7-1 The mine will pollute the air. I suffer from asthma and chronic lung problems.
The mine could remove 1 to 3 million gallons of water per day for years dewatering hundreds of wells. I have a well so this is of concern to me.
The dumping of wastewater into South Fork Wolf Creek will destroy ecosystems and natural habitats.
Property values could go down by 30% or more & wells go dry.

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Carol Hyndman
Address: 14740 Orrfalli Rd Grass Valley CA 95949
Phone number: 530) 477-0693
Email:

FORM LETTER A 7: CAROL HYNDMAN

Response to Comment A 7-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 8

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan 19, 2022

RECEIVED
JAN 21 2022
NEVADA COUNTY
PLANNING DEPARTMENT



Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Since I suffer from Asthma and Chronic lung problems the air pollution is of concern to me
The ~~mov~~ removal of 1-3 million gallons of water per day is worrisom since I am on a well. Property values could drop by up to 20% of wells go dry
The waste water will destroy natural habitats and ecosystems.

A 8-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Carol Hyndman

Address: 14740 Orzalli Rd Grass Valley, CA 95945

Phone number: 530) 477-0693

Email:

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 8: CAROL HYNDMAN

Response to Comment A 8-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 9



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/17/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 9-1

My cardio-respiratory system is already sensitized (allergic) to diesel exhaust, which contains hundreds of toxic chemicals, as well as particulates fine enough to get into one's blood with adsorbed chemicals. The mine anticipates continuous diesels (hauling explosives + rock — 100 trips a day. NO!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Carol Kuczora

Name: CAROL KUCZORA

Address: 11198 BUTLER RD

Phone number: (530) 273-7771

Email: CAROL.KUCZORA98@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER A 9: CAROL KUCZORA

Response to Comment A 9-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 10



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/17/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 10-1

My CARDIO-RESPIRATORY SYSTEM IS ALREADY SENSITIZED (ALLERGIC) TO DIESEL EXHAUST, WHICH CONTAINS HUNDREDS OF TOXIC CHEMICALS, AS WELL AS PARTICULATES FINE ENOUGH TO GET INTO ONE'S BLOOD WITH ADSORBED CHEMICALS. THE MINE ANTICIPATES CONTINUOUS DIESELS HAULING EXPLOSIVES + ROCK — 100 TRIPS A DAY. NO!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Carol Kuczora

Name: CAROL KUCZORA

Address: 11198 BUTLER RD

Phone number: (530) 273-7771

Email: CAROL.KUCZORA98@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER A 10: CAROL KUCZORA

Response to Comment A 10-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 11

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/18/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) Rise Gold has never opened a hard rock mine & has never made a profit on previous ventures. He has been charged with environmental violations in BC.
2) Removal of precious water (which is more precious than gold) 1-3 MILLION GALLONS of contaminated water, to our streams and emptying our wells as good water flows into mine shafts

A 11-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Carolyn Battaini

Name: Carolyn Battaini

Address: 14027 Liquidambar Ln. Grass Valley CA 95945

Phone number: 650-996-1939

Email: crosjb@me.com

RECEIVED
FEB 23 2022
NEVADA COUNTY PLANNING COMMISSION

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 11: CAROLYN BATTAINI

Response to Comment A 11-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 12

RECEIVED
JAN 20 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/17/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The quality of life in Nevada County would be seriously damaged: air quality, truck traffic, blasting, environmental damage— Haven't we learned our lessons from hard-rock and hydraulic mining? These kinds of damages can not be undone.

A 12-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Cheryl Morris

Name: Cheryl Morris

Address: 113 Defiant Way, GV 95945

Phone number: 530-273-1980

Email: Jmorris4550-cheryl@yahoo.com

FORM LETTER A 12: CHERYL MORRIS

Response to Comment A 12-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter A 13

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

RECEIVED
JAN 21 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Date: 1/17/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The quality of life in Nevada County would be seriously damaged: air quality, truck traffic, blasting, environmental damage. Haven't we learned our lessons from hardrock and hydraulic mining? These kinds of damages cannot be undone.

A 13-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Cheryl Morris

Name: Cheryl Morris

Address: 113 Defiant Way, GV 95945

Phone number: 530-273-1990

Email: jmorris4550-cheryl@yahoo.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 13: CHERYL MORRIS

Response to Comment A 13-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter A 14

RECEIVED
JAN 20 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- the mine will pollute our air & increase lung disease.
- hard rock mining is the single largest source of toxic waste in the U.S.
- Clouds of airborne toxic mining dust, including asbestos, will drift downward into Grass Valley!!!

A 14-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Constance Wright
Address: 196 Northridge Dr. Grass Valley 95945
Phone number: 530-205-9835
Email: connie jean wright 123@gmail.com

FORM LETTER A 14: CONSTANCE WRIGHT

Response to Comment A 14-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 15

RECEIVED
JAN 21 2022
NEVADA COUNTY PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease
- Homeowners can lose an estimated 20% in their property values
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives

A 15-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Constance J Wright
Address: 196 North Ridge Dr, Grass Valley 95945
Phone number: 503 205 9835
Email: Conniejeanwright123@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 15: CONSTANCE WRIGHT

Response to Comment A 15-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter A 16

Dist 3

RECEIVED
JAN 20 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1-17-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The risks to the environment far outweigh the benefits. The volume of water that will be discharged into Wolf Creek will forever change that eco system. Hard rock mining is the single largest source of toxic waste in the US. The noise and increase industrial truck traffic will change the quality of life in G.V. There are so many other concerns, but these are my top two

A 16-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,
Gwen P. Eymann

Name: Gwen Eymann
Address: 512 Butler St., G.V. CA 95945
Phone number: 530 274-7965
Email: gweneymann@gmail.com

FORM LETTER A 16: GWEN P. EYMANN

Response to Comment A 16-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter A 17

RECEIVED
JAN 21 2022
NEVADA COUNTY
PLANNING

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1-17-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
The risks to the environment far outweigh the benefits of this project. The volume of water that will be discharged into Wolf Creek will forever change that eco system. Hard rock mining is the single most toxic waste producing industry in the USA. The noise and increase industrial truck traffic will change the quality of life in G.V. And there is so much more but these are my two biggest concerns

A 17-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,
Gwen P. Eymann

Name: Gwen P. Eymann
Address: 512 Butler St. Grass Valley, CA 95945
Phone number: 530 274-7965
Email: gweneymann@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 17: GWEN P. EYMANN

Response to Comment A 17-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter A 18

Dist 1

February 12, 2022

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading, and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- While Rise Gold shareholders profit, the local community gets little revenue.
- Where will the imported workers live when housing is so limited in our area?

A 18-1

I am a member of the local faith-based organization the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Janet L. Dunstan
19595 Bow Valley Road
Grass Valley, CA 95945
Phone number: 530-205-8154
Email: janetldunstan@gmail.com

FORM LETTER A 18: JANET DUNSTAN

Response to Comment A 18-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter A 19

Past 3

RECEIVED
JAN 20 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 17 Jan. 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Degradation of the environment

A 19-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jennifer O. Dewey
Address: 1049 Laurel Lane, Grass Valley, Ca. 95945
Phone number: (530) 210-6320
Email: hennifreed@gmail.com

FORM LETTER A 19: JENNIFER O. DEWEY

Response to Comment A 19-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 20

RECEIVED
JAN 21 . 22
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 17 Jan. 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Degradation of the environment

A 20-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jennifer O. DEWEY

Address: 1049 laurel lane, grass Valley, Ca. 95945

Phone number: (530) 270-6320

Email: jennifercdo@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

this in our h

FORM LETTER A 20: JENNIFER O. DEWEY

Response to Comment A 20-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 21

RECEIVED
Dist 3
FEB 16 2021
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/27/21

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I (and 80% of my friends) live & work nearby.

A 21-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jesse Wilson (CEO, Brown Banana Books)
Address: 671 Maltman Dr., Grass Valley
Phone number: 530-886-9509
Email: [redacted]@protonmail.com
BrownBananaBooks

FORM LETTER A 21: JESSE WILSON

Response to Comment A 21-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 22

D.ist 3

RECEIVED

JAN 21 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THEY REMOVE AT LEAST 1 MILLION GALLONS OF WATER EVERY DAY DEWATERING HUNDREDS OF WELLS

A 22-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: JOEL HOUTMAN

Address: 446 CHAPEL ST, GRASS VALLEY

Phone number: 530-273-2925

Email: jhoutman@gmail.com

FORM LETTER A 22: JOEL HOUTMAN

Response to Comment A 22-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model.

Form Letter A 23



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THE REMOVAL OF AT LEAST 1 MILLION GALLONS OF WATER EVERY DAY DEWATERING HUNDREDS OF WELLS

A 23-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: JOEL HOUTMAN

Address: 418 CHAPEL ST, GRASS VALLEY, CA

Phone number: 530-273-2725

Email: jhoutman@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 23: JOEL HOUTMAN

Response to Comment A 23-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model.

Form Letter A 24

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

air pollution - I recently read a presentation by Pam Heard, a respitory therapist given on Dec 16, 2021 she detailed toxic air pollutants that would be released by the mine operations — diesel ex haust, radon silica & asbestos. I moved here in 2019 with my daughter, son-in-law & grand-children. The mine would dash our hopes for a safe, beautiful environment

A 24-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Mary Pickett

Address: 305 West Main St. Apt 205, Grass Valley, CA 95945

Phone number: 575.779.2737

Email: ~~Mary~~ marypickett2@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

RECEIVED
JAN 29 2022

FORM LETTER A 24: MARY PICKETT

Response to Comment A 24-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 25

Unable to identify

RECEIVED

JAN 19 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan 13, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
our quality of life. ongoing econ. effects, air, water etc

A 25-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely, MRidgway

Name: MELISSA Ridgway

Address: 222 Maidu Lane

Phone number:

Email:

FORM LETTER A 25: MELISSA RIDSWAY

Response to Comment A 25-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life and economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter A 26

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan 13, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
quality of life, econ., water, air, seismic etc

A 26-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

RECEIVED
JAN 19 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Sincerely, melissa Ridgway

Name: melissa Ridgway

Address: [redacted]

Phone number:

Email:

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 26: MELISSA RIDSWAY

Response to Comment A 26-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life and economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter A 27

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/21/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

(1.) County does not have the ability to monitor EPR mitigations 24/7, seven days per week
(2.) Bad track record of Rise Gold Mine mgmt.
(3.) Lowering my property value. I have lived 33 yrs. less than 5 miles from the mining site off Brunswick

A 27-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Paul B Elms
Address: 12125 Crystal Springs Rd.
Phone number: 530-414-6055
Email: ppcpaulie2000@gmail.com

FEB 25 2022

FORM LETTER A 27: PAUL ELINS

Response to Comment A 27-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter A 28

RECEIVED
FEB 10 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Hard rock mining is the single largest souce of toxic waste in the USA.
Trucks hauling 1000 tons of waste rock, 100 trips every day, down Brunswick Rd.
Blasting 7 days a week in the tunnels under Grass Valley.
Homeowners can lose an est. 20% in property values.
Removal of 1-3 million gallons of contaminated water per day, dewatering hundreds of wells and ruining downstream ecosystems.

A 28-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Ruth Edwards

Name:
Ruth Edwards
Address:
17833 Foxtail Drive, Penn Valley, CA 95946
Phone number: 530-278-6030
Email: ruthjoedwards@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER A 28: RUTH EDWARDS

Response to Comment A 28-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 29

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/7/22
D5th

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Hard rock mining is the single largest source of toxic waste in the USA.
Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Rd.
Blasting 7 days a week in tunnels under Grass Valley.
Homeowners can lose an est. 20% in property values.
Tourist trade will be hurt.
Removal of 1-3 million gallons of contaminated water per day, dewatering hundreds of wells and ruining downstream ecosystems.

A 29-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Ruth Edwards

Name: Ruth Edwards
Address: 17833 Fortail Drive, Penn Valley, CA 95946
Phone number: 530-278-6030

Email: ruthjoedwards@hotmail.com

FORM LETTER A 29: RUTH EDWARDS

Response to Comment A 29-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter A 30

Dist 1

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/18/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Lies, deceptions, and false claims to the community, and his investors.

If approved will leave a path of destruction for us – and he goes back home to Canada,

A 30-1

Can't afford this mistake!!!!!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely, [signature]

Name: Steven J. Battaini

Address: 14027 Liquidambar Ln., Grass Valley CA 95945

Phone number: 530-240-5060

Email: dvsjb7@gmail.com

FORM LETTER A 30: STEVEN BATTAINI

Response to Comment A 30-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 31

Dist 1

RECEIVED

JAN 28 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/25/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine would significantly change the cultural/social environment, away from the current focus on culture, art, crafts, writing and healthy retirement.
- Traffic issues in the 174/Brunswick corridor, already difficult, would decline
- N County taxpayers should not be asked to risk/trust Rise Gold + Mossman, based on the sad history of both.
- Mossmans legal/environmental issues with indigenous BC does not bode well in our area.
- The energy demands of a functional I/M would require downgrading of our ambitions and progressive county plan to reduce fossil fuel dependency.
- Published health risks of mine communities are a big negative for some vulnerable seniors in our large retirement communities

A 31-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely, Steve Temple

Name: Steven Temple

Address: 13459 Bass Trail GV 95945

Phone number: 530 220-0995

Email: SRTemple@UCDavis.edu

FORM LETTER A 31: STEVEN TEMPLE

Response to Comment A 31-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Social and economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding energy demand, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 32

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/25/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- It will significantly change the cultural/social environment in a negative way.
- It would add large traffic issues in the 174/Brunswick corridor.
- No taxpayer should not be asked to trust Rise Gold and Mossman based on Mossman's legal issues with native people in B.C. is serious, their collective history.
- The energy demands of the mine would require major revision of our N.C. plan and strategy for reducing energy dependence on fossil fuels.
- Our NC community thrives on retirement seniors vulnerable to some of the numerous health concerns.

A 32-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Steven Temple

Name: Steven Temple

Address: 13459 Bass Trail, GV, 95945

Phone number: 530-220-0995

Email: SRTemple@UCDavis.edu

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

RECEIVED
JAN 31 2022

FORM LETTER A 32: STEVEN TEMPLE

Response to Comment A 32-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Social and economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding energy demand, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter A 33

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: February 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
Rise has yet to say how they will mitigate the air pollution produced by multi-ton diesel trucks running 16 hrs/day, 7 days/week, 365 days/year nor the heavy, diesel-powered equipment. GV is already known as the "bad pipe" of Gold County with the air pollution from Sacramento & the Central Valley trapped here each summer. Will I be forced to wear a mask on every dog walk, bike, stroll through neighborhood? I want to live here and breathe !!

A 33-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,
Susan Merrill

Name: Susan Merrill

Address: 115 Union Jack St. #47
Grass Valley, CA 95945

Phone number: 415-505-1251

Email:
merrillsl@comcast.net

RECEIVED
FEB 23 2022
NEVADA COUNTY
COMMUNITY DEVELOPMENT

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 33: SUSAN MERRILL

Response to Comment A 33-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Impact 4.3-2 in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR, which provides a detailed analysis of whether the project would expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants such as diesel exhaust.

Form Letter A 34

Dist 3

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 18, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 34-1 Rise has yet to say how they will mitigate the air pollution caused by multi-ton diesel trucks running 16 hrs./day, 7 days/week, 365 days/year and the diesel-powered, heavy equipment. GV is already known as the "tail pipe" of Gold County due to the air pollution from Sacramento and the Central Valley that gets trapped here every summer. Will I be forced to wear a mask year round on ~~so~~ every dog walk, hike, stroll through the neighborhood or even stepping out to ~~greet~~ greet a neighbor? I want to live here and I want to BREATHE!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Susan Merrill

Name: Susan Merrill

Address: 115 Union Jack St. #47
Grass Valley, CA 95945

Phone number: 415-505-1251

Email: merrillsl@comcast.net

FORM LETTER A 34: SUSAN MERRILL

Response to Comment A 34-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Impact 4.3-2 in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR, which provides a detailed analysis of whether the project would expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants such as diesel exhaust.

Form Letter A 35

Dist 3

RECEIVED

Date: FEB 11 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 35-1

Rise Gold is in litigation on their last project for failing to adhere to environmental infractions and clean it up. There is not a single reason for this mine reopening that is beneficial to our community or environment. The only benefit goes to share holders & politicians who are in their pocket. Wake up and do what is right!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely Teresa Freeman

Name: Teresa Freeman

Address: 334 S. School St. Apt B
Grass Valley, CA 95945

Phone number: 530-545-3142

Email: T-Freeman48@Hotmail.com

FORM LETTER A 35: TERESA FREEMAN

Response to Comment A 35-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter A 36

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/18/2022

RECEIVED
JAN 21 2022
COUNTY PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Hard rock mining is the largest source of toxic waste in the U.S. Trucks will haul mine waste rock, 100 trips every day down Brunswick road, making a pile higher than 6 stories at the Centennial site. Not only that, but Rise Gold already has numerous violations of mining & environmental laws.

A 36-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Theresa Houtman

Name: Theresa Houtman
Address: 418 Chapel, Grass Valley
Phone number: 530 277-9294
Email: Gardenangel481@Gmail.com.

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 36: THERESA HOUTMAN

Response to Comment A 36-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter A 37

Dist 3

RECEIVED

0 2022

N A COUNTY
BOAR UPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/16/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This mine will
1. Run 24hrs a day
2. Large trucks will be running locally continuously All day long
3. Lower property values of homes due to disruption
4. Large volumes of contaminated water dumped into Wolf creek continuously.
5. a minimal number of people will be Locally hired
6. It will hurt tourism
7. And much more

A 37-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Walter Holtan

Name: Walter Holtan

Address: 512 Butler St
Grass Valley CA 95945

Phone number: 530 274 7965

Email: bstiknb@gmail.com

FORM LETTER A 37: WALTER HOLTAN

Response to Comment A 37-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter A 38

RECEIVED
JAN 21 2022
NEVADA COUNTY
PLANNING DEPARTMENT



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/16/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The mine will

1. Run 24 hrs per day
2. Large trucks will be running locally continuously all day.
3. Lower property values of homes
4. Large volumes of contaminated water dumped into Wolf Creek and much more.

A 38-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Wally Holtan

Name: WAITER HOLTAN

Address: 512 Butler St
Grass Valley, CA 95945

Phone number: 530 274 7965

Email: bstikn@gmail.com

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER A 38: WALTER HOLTAN

Response to Comment A 38-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter A 39

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 11 Feb 22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Keep the Gold in the ground!
Do not pollute and use our water!
Do not pollute our air - I am 84 years old - protect our Health!
potential Rise danger!

A 39-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely, W Bault

Name: WILLIAM BAULT
Address: 231 Woodside CT. Grass Valley
Phone number: 530-272-1736
Email: — none

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER A 39: WILLIAM BAULT

Response to Comment A 39-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to the pollution of groundwater and surface water, please refer to Impact 4.8-1 in Chapter 4.8, Hydrology and Water Quality, of the DEIR, which provides a detailed analysis of whether the project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Please also see Master Response 35 - Discharge to South Fork Wolf Creek. Please refer to Chapter 4.13, Wildfire, of the DEIR with regard to impacts associated with potential fire danger.

Form Letter A 40

Dist 3

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 11 Feb 22

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A 40-1

Keep the gold in the ground!
Do not pollute and use our water!
Do not pollute the air – I am 84 years old – protect our Health.
Potential fire danger!

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely, WBault

Name: William Bault
Address: 231 Woodside CT, Grass Valley
Phone number: (530) 272-1736
Email: none

FORM LETTER A 40: WILLIAM BAULT

Response to Comment A 40-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to the pollution of groundwater and surface water, please refer to Impact 4.8-1 in Chapter 4.8, Hydrology and Water Quality, of the DEIR, which provides a detailed analysis of whether the project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Please also see Master Response 35 - Discharge to South Fork Wolf Creek. Please refer to Chapter 4.13, Wildfire, of the DEIR with regard to impacts associated with potential fire danger.

Form Letter B 1

Not a County resident

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: FEB 07 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I will not buy property here or support business if mine opens

B 1-1

Frequent visitor

I am ~~resident~~ of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, [signature]

Name: Aaron Corbiere

Address:

Phone number: 800 753-8733

Email:

FORM LETTER B 1: AARON CORBIECE

Response to Comment B 1-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 2



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/8/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. Concern for the wellbeing and safety of the thousands of residents surrounding the mine and waste sites.
2. Water contamination or dewatering of the wells of the surrounding properties.
3. Air pollution; toxic asbestos dust, diesel exhaust.
4. Underground tremors from blasting.
5. Noise of crushers running 24/7.
6. Previous and continuing violations of mining and environmental laws by Rise Gold.
7. Bankruptcy of Rise Gold.
8. Lowering of property values.
9. The disruption of our quiet, rural way of life, the very thing that brought us to this idyllic area from the noisy, contaminated, exceptionally crowded Los Angeles megalopolis.

B 2-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

This is a bad company, out to extract money from our land at any price, regardless of the welfare of our citizens, our water, our state, our environment. Please vote NO.

Sincerely,

Name: Alan James
Address: 13430 Jeabjo Way, Nevada City, CA 95959
Phone number: 530-263-4996
Email: alanmjames@yahoo.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 2: ALAN JAMES

Response to Comment B 2-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 3

Dist 4 RECEIVED
FEB 11 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/9/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. Concern for the wellbeing and safety of the thousands of residents surrounding the mine and waste sites.
2. Water contamination or dewatering of the wells of the surrounding properties.
3. Air pollution; toxic asbestos dust, diesel exhaust.
4. Underground tremors from blasting.
5. Noise of crushers running 24/7.
6. Previous and continuing violations of mining and environmental laws by Rise Gold.
7. Bankruptcy of Rise Gold.
8. Lowering of property values.
9. The disruption of our quiet, rural way of life, the very thing that brought us to this idyllic area from the noisy, contaminated, exceptionally crowded Los Angeles megalopolis.

B 3-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

This is a bad company, out to extract money from our land at any price, regardless of the welfare of our citizens, our water, our state, our environment. Please vote NO.

Sincerely,

Name: Alan James
Address: 13430 Jeabjo Way, Nevada City, CA 95959
Phone number: 530-263-4996
Email: alanmjames@yahoo.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 3: ALAN JAMES

Response to Comment 3-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 4

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: March 20, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Are you Kidding Me??!! (Were do you live??)
Please Do your Homework on this company!
I have done a complet Info check and I give them a (F-).
Please open your eyes and look into your hearts!
the Impack on our community will be change forever!

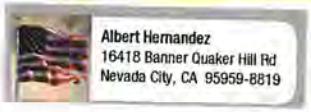
B 4-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Mr Albert Hernandez

And I care about our Community and this beautiful Co.

Name:
Address:



Phone number: 530 . 864-2480

Email: N/A I dont have a computer!

FORM LETTER B 4: ALBERT HERNANDEZ

Response to Comment B 4-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Form Letter B 5

Dist 2

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/13/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 5-1

Air + Water toxins
traffic snarls
roads diminished
quality of small-town life destroyed
noise pollution

Don't do it!

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Alison Osborn

Name: Alison Osborn

Address: PO Box 453 Grass Valley 95945

Phone number: 20073 Ocelot Dr Grass Valley 95949

Email: alisonosborn@sbcglobal.net

FORM LETTER B 5: ALISON OSBORN

Response to Comment B 5-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 6

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/13/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 6-1

air + water toxins
traffic !
roads diminished
quality of small-town life destroyed
noise pollution
Don't do it!

RECEIVED
MAR 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Alison Osborn

Name: Alison Osborn

Address: PO Box 453 Grass Valley 95945

Phone number:

Email: alisonosborn@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 6: ALISON OSBORN

Response to Comment B 6-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 7

NO MINE!!!
Too Risky!!

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/16/2022

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I have concerns about the energy and water consumption of this enterprise, in particular the potential to drive up prices for these commodities in the area, potential to drain wells of people who are currently self-sufficient in water. Also, I have concerns about the noise and pollution of the mine and the potential for sinkholes and other problems, environmental in nature, that will be created in Wolf Creek. This is an area where a major sinkhole had already opened up in 2017 (across Banner Lava Cap Rd, Nevada City, CA 95959) considered to be a "critical drain" for the city of Grass Valley. Wolf Creek goes right through downtown, so massive increased water flow could have enormous impact if it floods, causes excess debris, or more sinkholes as a result of high flow.

B 7-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Amanda Ganong

Name: Amanda Ganong

Address: 10626 Banner Lava Cap Rd, Nevada City, CA 95959

Phone number: ~~857~~ 928.4043

Email: amandaganong@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 7: AMANDA GAHONG

Response to Comment 7-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns over energy consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns.

Form Letter B 8

Dist 1

NO MINE!!!
Too Risky!!

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/16/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I have concerns about the energy and water consumption of this enterprise, in particular the potential to drive up prices for these commodities in the area, and the potential to drain wells of people who are currently self-sufficient in water. Also, I have concerns about the noise and pollution of the mine and the potential for sink holes and other problems, environmental in nature, that will be created in Wolf Creek. This is an area that is considered a "critical drain" for the city of Grass Valley, and a place where a major sink hole had already opened up in 2017. Wolf Creek flows right through downtown with some underground culverts, so

B 8-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Amanda Ganong

Address: 10626 Banner Lava Cap RD, Nevada City, CA 95959

Phone number: 857-928-4843

Email: amanda.ganong@gmail.com

a massive increase in waterflow as predicted by the large amounts of water the mine anticipates in pumping — could have devastating consequences if it floods or clogs with debris.

FORM LETTER B 8: AMANDA GAHONG

Response to Comment B 8-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns over energy consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns.

Form Letter B 9

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb 1, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Nevada County currently has a surplus of unfilled job positions.
- Where will the imported workers live when housing is so limited in our area.

B 9-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Amanda Kenney

Name: Amanda Kenney

Address: 17842 Gray Oak dr RR Ca 95975

Phone number: 916-769-9674

Email: Coasta4@live.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 07 2022

FORM LETTER B 9: AMANDA KENNEY

Response to Comment B 9-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Form Letter B 10

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED Date: Feb 1, 2022

FEB 07 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 10-1 @ Claims that a few hundred jobs cannot justified the likelihood of increased Lung Cancer in Nevada County.

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Amanda Kenney

Name: Amanda Kenney
Address: 17843 Gray Oak dr RR Ca 95975
Phone number: 916-769-9674
Email: coasta4@live.com

FORM LETTER B 10: AMANDA KENNEY

Response to Comment B 10-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Form Letter B 11

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/9/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 11-1

The mine will pollute our air and increase lung disease. My daughter already has lung disease. This could make it worse.
Cloud of airborne toxic mining dust including asbestos will drift down wind into Grass Valley.
Removal of 1-3 million gallons of contaminated water per day for next 80 years dewatering hundreds of wells.
Wastewater dumped into S. Fork Wolf Cr. will destroy habitat and shrimp, toxic residues

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Amy B. Edwards

Address: 17833 Foxtail Dr. Penn Valley CA 95946

Phone number: 530 277 7773

Email: MS.MOUSKIN41@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 11: AMY EDWARDS

Response to Comment B 11-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Finally, regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 12

Dist 4

RECEIVED
FEB 14 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-9

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 12-1

The mine will pollute our air and increase lung disease. My daughter already has lung disease. This could make it worse.
Clouds of airborne toxic mining dust, including asbestos will drift downwind into Grass Valley
Removal of 1 million - 3 million gallons of contaminated water per day for the next 80 years de-watering hundreds of wells.
Waste water will be dumped into S. Fork Wolf Creek destroying habitat and stirring up toxic residues.

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Amy B Edwards

Name: Amy B Edwards

Address: 17833 Foxtail Dr. Penn Valley CA 95946

Phone number: 530 277-7773

Email: ms.mouskin41@gmail.com

FORM LETTER B 12: AMY EDWARDS

Response to Comment B 12-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Finally, regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 13

12575

RECEIVED

JAN 20 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

January 17, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, Amy R Patterson, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods.

B 13-1

- Underground blasting is planned for 7 days a week and will be felt by those living above the
2,585 acres of mine underground mineral rights -- see map!
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,



Amy R Patterson

267 Hughes Road

Grass Valley, CA 95945-5643

530-273-4681

FORM LETTER B 13: AMY PATTERSON

Response to Comment B 13-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 14



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

January 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, Amy R Patterson, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.

B 14-1

- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights -- see map!
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- Nevada County revenue will be from ordinary property taxes, not from gold.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,



Amy R Patterson

267 Hughes Rd

Grass Valley, CA 95945-5643

530-273-4681

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 14: AMY PATTERSON

Response to Comment B 14-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 15

Dist 1

RECEIVED
FEB 01 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 01/22/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

POLUTION REASONS

B 15-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: ANDREA STOUT

Address: 560 E. BROAD ST. N.C. 95959

Phone number: 5609551579

Email: ANDREJKSTOUT@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 15: ANDREA STOUT

Response to Comment B 15-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 16

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 01/22/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

POLUTION REASONS

B 16-1



I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: ANDREA STOUT

Address: 560 E. BROAD ST. N.C. 95959

Phone number: 530 955 1579

Email: ANDREJEAMIN@GMAIL.COM

FORM LETTER B 16: ANDREA STOUT

Response to Comment B 16-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 17

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: March 20, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 17-1

The "significant and unavoidable" impacts of noise and vibration! Though the EIR determined that this would only happen during the initial construction activities my feeling and experience with noise is that it can be omnipresent when dealing with a VALLEY which "We are in"! Even minor noises tend to be compounded in hather usual situations (accidents, fire engines, even minor (so called) explosions. Vibration also has significant impacts in an area like ours which has tourist traffic as its major industry. A visit to downtown Grass Valley reveals many businesses use hanging and wall displays to promote their merchandise. Vibration travelling up from under-ground blasting would create havoc with glass, ceramic, and other breakable products. It might be severe enough to put small business "out of business" because of breakage & disarray. We need our tourists to keep the ambiance we have worked so hard to create over the years

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Anita Wald-Tuttle, former co-owner of Tanglewood Forest Gallery for 25 years. A majority of our products being from our trees

Name:
Anita Wald-Tuttle

Address:
6 Rockwood Drive

Phone number:
530-277-6195

Email: anitawlt3@gmail.com

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 17: ANITA WALD-TUTTLE

Response to Comment B 17-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Also see Master Response 7 related to underground blasting effects.

Form Letter B 18

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: March 20, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 18-1

The "significant and unavoidable" impacts of noise and vibration! Though the EIR determined that this would only happen during the initial construction activities my feeling and experience with noise is that it can be omnipresent when dealing with a VALLEY which "we are in"! Even minor noises tend to be compounded in hither-to usual situations (accidents, fire engines, even minor (so called) explosions. Vibration also has significant impacts in an area like ours which has tourist traffic as its major industry. A visit to downtown Grass Valley reveals many businesses use hanging and wall displays to promote their merchandise. Vibration travelling up from under-ground blasting would create havoc with glass, ceramic, and other breakable products. It might be severe enough to put small business "out of business" because of breakage & disarray. We need our tourists to keep the ambiance we have worked so hard to create over the years

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Anita Wald-Tuttle, former co-owner of Tanglewood Forest Gallery for 25 years. A majority of our products hung from our trees

Name:
Anita Wald-Tuttle
Address:
6 Rockwood Drive
Phone number:
530-277-6195
Email: anitaw1t3@gmail.com

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 18: ANITA WALD-TUTTLE

Response to Comment B 18-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Also see Master Response 7 related to underground blasting effects.

Form Letter B 19

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/16/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The mine will polute our air!

B 19-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Anne Emerson
Address: 11859 Old Wood Rd, Nev City
Phone number:
Email: shantiemerson@yahoo.com

FORM LETTER B 19: ANN EMERSON

Response to Comment B 19-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 20

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/31/22

FEB 1 6 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 20-1

When I first heard reports questioning the long-term viability of our Cal Fire air attack base because of encroaching housing developments, I was at a loss for words. Why would we ever jeopardize the safety of existing development to make room for just a little more. And now we think it's a good idea to approve a plan that puts 100 trucks hauling toxic waste on the road connecting that airport & new housing development? I hope my use of "we" doesn't include you. It sounds like a threat to that airport that is our lifeline.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name:
Anna Frizzell
Address:
10392 Willow Valley Rd., Nevada City
Phone number:
707-321-3479
Email: annadfrizzell@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 20: ANNA FRIZZELL

Response to Comment B 20-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 21

Dist 1

RECEIVED
FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/14/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 21-1 I am again shocked that we are considering anything that could be cited as threatening our lifeline. I'm referring to our Cal Fire Air Attack base located just down the road from the proposed mine site. I was shocked to hear rumors questioning the long-term viability of the air attack base reported on by the Union in 2021, cited as due to the new housing developments ~~just~~ (Loma Rica). And now we're considering a plan that puts 100 trucks hauling toxic waste on that road connecting the airport & new housing development to town? It sounds like a recipe for disaster to me. + all of the environmental risks to our precious water resources.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Anna Frizzell

Address: 10392 Willow Valley Rd., Nevada City

Phone number: 707-321-3479

Email: annafrizzell@gmail.com

FORM LETTER B 21: ANNA FRIZZELL

Response to Comment B 21-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 22

Dist 4

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/1/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I don't want the damage to the community
The mine will cause, especially to the environment.

B 22-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Anne Adden

Name: ANNE ADDEN

Address: 10784 PENN VALLEY, CA 95946

Phone number: 530-277-6684

Email: aadden722@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 22: ANNE ADDEN

Response to Comment B 22-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 23

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3/19/22

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 23-1

Mining does not belongs so close to our cities and residences. Noise, truck traffic, air quality, and water quality/availability are major concerns. The questionable prior practices of Rise Gold (or it's owner) and Rise Gold's "to good to be true" promises are also major concerns.
We do not need another reason for people to move from the area.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Please NO MINE!

Sincerely, Anne Padget

Name: Anne Padget
Address: 303 Redbud Way NC 95959
Phone number: 530-913-0339
Email: apadget844@gmail.com

FORM LETTER B 23: ANNE PADGET

Response to Comment B 23-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 24

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT



Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 24-1

3.6 million gallons of treated wastewater would be released everyday into the South Fork Wolf Creek for 6 months, then 1.2 million gallons a day there after.

Depletion of our regions groundwater and impacts to private wells.

Rise Gold claims "zero risk to wells", is a flawed privately funded hydrology study.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Annie Speegle

Name:
Annie Speegle

Address:
506 main St. N.C., CA 95959

Phone number:
530-913-9776

Email:
ahspeegle@sbcglobal.net

FORM LETTER B 24: ANNIE SPEEGLE

Response to Comment B 24-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. With respect to effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 25

Dist 1

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 25-1 Rise Gold Corp. disregards the fact that hard rock gold mining is in no way compatible with the community that Grass Valley has become. The environmental destruction that inevitably comes with mining, the risks to private wells already impacted by drought, and the decline in value for properties in the region. Grass Valley needs cleaner industries with staying power to contribute to economic resiliency.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Annie Speegle

Name: Annie Speegle

Address: 506 main St. Nevada City, Ca, 95959

Phone number: (530) 913-9776

Email: ahspeegle@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 25: ANNIE SPEEGLE

Response to Comment B 25-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3. Property values and economic resiliency concerns are outside the scope of CEQA – Please see Master Response 2.

Regarding concerns about the proposed project's compatibility with the surrounding land uses, please refer to Chapter 4.9, Land Use and Population and Housing, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells..

Form Letter B 26

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2.18.21

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 26-1 Home owner property values will plummet in neighborhoods impacted by operations & transportation.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Ari Haze
Address: 15420 Lower Colfax Rd. Grass Valley
Phone number: (415) 308-6691
Email: Ari@HopeArch.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 26: ARI HOPE

Response to Comment B 26-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Form Letter B 27

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- air pollution and lung disease
- removing millions of gallons of contaminated water will deplete our already low water supply
- waste water will be dumped in the creek near my home.
- toxic chemicals that are dumped will harm the ecosystem.
- dry wells = less people moving near here = no money

B 27-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Aseyn Neal
Address: 122 Berriman loop
Phone number: 231-715-8249
Email: aselfnelpza@gmail.com

FORM LETTER B 27: ASELIN NEAL

Response to Comment B 27-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 28

BOS

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/22/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Removal of 1-3 million gallons of contaminated water per day for the next 50 years, dewatering 100's of wells
- Trucks hauling 1,000 tons of water rock, 100 trips every day, down Brunswick Rd, piling it higher than a 6 story bulding at the Centennial site.
- while Rise Gold shareholders profit, the local community gets little revenue.

B 28-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Ashley Berry
Address: 13470 Mule Canyon Rd. Grass Valley, CA 95945
Phone number: (413) 588-8302
Email: ashleyberrybodywork@gmail.com

FORM LETTER B 28: ASHLEY BERRY

Response to Comment B 28-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 29

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/22/22

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 29-1

- Removal of 1-3 million gallons of contaminated water per day for the next 80 years, dewatering 100's of wells
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Rd. piling it higher than a 6 story building at the Centennial site
- While Rise Gold Shareholders profit, the local community gets little revenue

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name:
Ashley Berry
Address:
13470 Mule Canyon Rd. Grass Valley, CA 95945
Phone number:
(413) 588-8302
Email: ashleyberrybodynorc@gmail.com
Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 29: ASHLEY BERRY

Response to Comment B 29-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 30

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 23, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 30-1 If reopening a mine here was a good idea, someone locally or within CA would have done this long ago. So I object to it happening at all and certainly not by someone outside the ~~Country~~ Company. Rise Gold has litigation against them which does not make them sound like a company to be trusted with our great assets here.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Barbara Brown

Name: BARBARA BROWN

Address: 251 Willow Valley Rd #14 Nevada City, CA

Phone number: 530-265-6028

Email: barbara95959@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

JAN 28 2022

FORM LETTER B 30: BARBARA BROWN

Response to Comment B 30-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 31

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Such an intense industrial use is not compatable with the residential areas surrounding it.

B 31-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Barry Wasse

Name:

Address: 11225 Vista Ave, Grass Valley CA

Phone number: 530 409 2954

Email: barry2775@gmail.com

RECEIVED
FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 31: BARRY WASSERMAN

Response to Comment B 31-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Regarding concerns about the proposed project's compatibility with the surrounding land uses, please refer to Chapter 4.9, Land Use and Population and Housing, of the DEIR.

Form Letter B 32

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Such an intense industrial use is a terrible idea for a residential area.

B 32-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Barry Wass

Name: Barry Wasserman
Address: 11225 Vista Ave, Grass Valley CA
Phone number: 530 409 2954
Email: barry2275@gmail.com

FORM LETTER B 32: BARRY WASSERMAN

Response to Comment B 32-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 33

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 24 Mar 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 33-1

A large factory on Brunswick Rd is in the middle of hundreds of family homes (zoned residential). Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, ~~enter~~ the noise pollution will be heard where I live & the roads are bad enough!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Bethejean L Spatafore

Name:
Bethejean L Spatafore
Address:
14118 Idaho Maryland Rd Nevada City CA 95959
Phone number:

Email: Bethejean@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 33: BETTEJEAN SPATAFORE

Response to Comment B 33-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about the proposed project's compatibility with the surrounding land uses, please refer to Chapter 4.9, Land Use and Population and Housing, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased trips on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 34
Dist 3

RECEIVED
FEB 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-22-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. It is too close to GRASS VALLEY and many homes
2. CEO Mossman has an unreliable track record.
4. DRAFT EIR leaves many questions unanswered.
5. This industry will negatively impact property values
6. Gold may be our history but it is not our future.
7. Do you want to be associated with the approval of this mine?

B 34-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Bill Lawrence

Address: 10201 Ridgeview Dr. Grass Valley, 95945

Phone number: 206-612-7925

Email: bplawrence@q.com.

FORM LETTER B 34: BILL LAWRENCE

Response to Comment B 34-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property value concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 35

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/22/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This will impact my property value. Poison the animals I so enjoy sharing land w/.

B 35-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Brittany Russel

Address: 15364 Norvin Way Grass Valley, CA 95949

Phone number: 541-531-8282

Email: Russelbrittany@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, ~~Principal~~ Planner Tyler Barrington

FORM LETTER B 35: BRITTANY ROUSSEL

Response to Comment B 35-1

The commenter's opposition to the project and concerns regarding property values and the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 – Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Form Letter B 36

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 36-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Brock Grininger

Name: Brock Grininger

Address: 12076 Thunder rd Grass Valley, CA

Phone number: 530-400-5262

Email: brockgrininger@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 11 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 36: BROCK GRININGER

Response to Comment B 36-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 37

Dist 2

RECEIVED

FEB 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 21, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.

B 37-1

- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produce from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.

- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights -- see map!
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- Nevada County revenue will be from ordinary property taxes, not from gold.
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.
- Rise Gold CEO, Ben Mossman, has been charged with environmental violations in B.C. Canada.
- There are many questions about the financial stability of Rise Gold Inc.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,



Name: Bruce McVicker

Address: 17485 Brewer Rd.

Phone number: 530-273-4983

Email: brumcv@icloud.com

FORM LETTER B 37: BRUCE MCVICKER

Response to Comment B 37-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 38

1 of 1

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: JAN 22 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Jeopardizing the groundwater source for residents in this community at a time when California is experiencing epic droughts is beyond irresponsible and shows a complete lack of concern for your constituents, the residents of Grass Valley. The potential economic benefits of this project will only be realized by a small number of people (mainly the Rise Gold Mine owners) and ~~are~~ are negligible when compared to the environmental and economic damages the community will experience over the coming decades. Please vote against this environmental disaster.

B 38-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: C. Greg Chapman

Address: 506 Main St, Nevada City, CA 95959

Phone number: (916) 216-0408

Email: gchapmanusanc@gmail.com

FORM LETTER B 38: C. GREG CHAPMAN

Response to Comment B 38-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding groundwater and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Form Letter B 39

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: JAN 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 39-1 Jeopardizing the groundwater aquifers at a time when California is experiencing epic droughts is irresponsible and shows a complete lack of concern for the residents of Grass Valley. The potential economic benefits are negligible compared to the economic and environment damages the community will experience over the coming decades.
Please vote against this enviromental disaster.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: C. Greg Chapman

Address: 506 Main St., Nevada City CA 95959

Phone number: (916) 216-0408

Email: gchapmanusanc@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 39: C. GREG CHAPMAN

Response to Comment B 39-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding groundwater and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Form Letter B 40

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/15/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 40-1 As a Nevada County native and resident I fear that the reopening of the mine will threaten our quality of life up here. The mine dust alone will cause more air pollution along with the increase in traffic. Please preserve the quality of life, the ground water and the property values of our fine County. Please vote NO!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: CARLETON FORSMAN

Address: 12952 Forsman Pl. Nevada City 95959

Phone number: 415-305-9303

Email: catzforsman@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 40: CARLETON FORSMAN

Response to Comment B 40-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 41

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/15/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 41-1

I'm a Native to Nevada City, born in Mercy Hospital in 1956. I oppose the reopening of the mine because of it's threat to the quality of life in Nevada County. There will be an increase in traffic which will decrease air quality and the mining will threaten ground water. Property values will decrease with the quality of life.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: CARLETON FORSMAN

Address: 12952 Forsman Pl. Nevada City 95959

Phone number: 415-305-9383

Email: catzforsman@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 41: CARLETON FORSMAN

Response to Comment B 41-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 42

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/15/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 42-1 I'm a Nevada City native born in Miner's Hospital in 1956. I oppose the reopening of the mine because of the increase in traffic, air pollution and the threat to ground water. The completed project would lead to blight I believe and a decrease in property values

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: CARLETON FORSMAN

Address: 12952 Forsman Pl. Nevada City 95959

Phone number: 415-305-9383

Email: ctzforsman@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 42: CARLETON FORSMAN

Response to Comment B 42-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 43

Dist 3

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 43-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Carol A Zappelli

Name: Carol A. Zappelli

Address: 115 Union Jack St #79

Phone number: 530 721-2785

Email: tahoe1650@aol.com

FORM LETTER B 43: CAROL ZAPPELLI

Response to Comment B 43-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 44

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 44-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Carol Zappelli

Name: Carol Zappelli

Address: 115 Union Jack St #79

Phone number: 530-721-2785

Email: tahoe6850@aol.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 23 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 44: CAROL ZAPPELLI

Response to Comment B 44-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 45

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

February 16, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.

B 45-1

- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- The mine will pollute our air and increase lung disease.

. Hard rock mining is the single largest source of toxic waste in the United States.

- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Page 2

Letter to Commission

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Carole McCammon

928 Morgan Ranch Drive

carole_mccammon@yahoo.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 45: CAROLE MCCAMMON

Response to Comment B 45-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 46

Dist 3

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

February 16, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

• Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.

• If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

• There is serious risk to our health, our environment, our property value, and our peace and quiet.

B 46-1 • The mine will pollute our air and increase lung disease.

. Hard rock mining is the single largest source of toxic waste in the United States.

• Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.

• A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).

• Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems

• The Rise Gold CEO already has numerous violations of mining and environmental laws. • Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.

Page 2

Letter to Supervisors

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Carole McCammon

Carole McCammon

928 Morgan Ranch Drive

carole_mccammon@yahoo.com

FORM LETTER B 46: CAROLE MCCAMMON

Response to Comment B 46-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 47

Dist 2

CAROLEE WEISBERG
134 BERRIMAN LOOP
GRASS VALLEY, CA 95949
caroleestrong@gmail.com
530-263-3026

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

February 14, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I oppose to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Raise Gold Corporation to be inconsistent, misleading, and manipulative. They fail to mitigate significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are multiple reasons this mine should NOT reopen. My personal reasons are:

B 47-1

1- The mine will pollute our air and increase lung disease.
2- Clouds of airborne toxic mining dust, including asbestos, will drift downwards into Grass Valley.
3- Hard rock mining is the single largest source of toxic waste in the United States.
4- Trucks hauling 1,000 tons of waste rock, making one hundred trips every day down Brunswick Road, piling it higher that a 6-story building at the Centennial site.
5- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
6- Crushing of 1,500 tons of waste rock every day, all day, and using massive machines.

I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Raise Gold Corporation has developed.

Sincerely,

Carolee Weisberg

FORM LETTER B 47: CAROLEE WEISBERG

Response to Comment B 47-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding concerns related to increased trips on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 48

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3.24.22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 48-1

Enviromental, property value, our health, water concerns. Rise Gold does not appear to be a company that has the locals best interest in mind.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, CKmcknight.

Name: Caroline mcknight

Address: 13206 Banner Lava Cap Rd. N.C

Phone number: 860 930 5776

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 48: CAROLINE MCKNIGHT

Response to Comment B 48-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 49

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3-20-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 49-1

I live downstream, so do many people in this town. As our country is on the verge of war, we must protect our waterways, which is the most critical element needed to survive. Make the right decision for Nevada County. Vote NO on reopening the mine!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: CARRIE Zoll

Address: 17127 Brewer Rd, Grass Valley

Phone number: 541-505-4699

Email: carrie.zoll@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 49: CARRIE ZOLL

Response to Comment B 49-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

With regard to concerns about impacts to waterways, please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR.

Form Letter B 50

B 50-4

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

All the usual reasons: pollution of many kinds - air, water, noise. Negative impacts on quality of life. But mostly, for me, larger water stewardship issues.

B 50-1

WATER - Since it is impossible to know how wells and other groundwater and surface water resources will be affected, piped, treated NID water should be provided to everyone in Western Nevada County before remotely considering any subsurface activity. Last time I checked, it was going to cost me $30,000 just to apply to NID for consideration of providing service.

Unkown beyond this is the actual cost of trenching, installing pipelines and meters.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Charles M. Chisholm

Address: 11224 Orion Way, Grass Valley, CA 95949

Phone number: 530-913-3913

Email: charles.chisholm@sbcglobal.net

FORM LETTER B 50: CHARLES CHISHOLM

Response to Comment B 50-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 51

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

All the usual reasons: pollution of many kinds - air, water, noise. Negative impacts on quality of life. But mostly, for me, larger water stewardship issues.

B 51-1

WATER - Since it is impossible to know how wells and other groundwater and surface water resources will be affected, piped, treated NID water should be provided to everyone in Western Nevada County before remotely considering any subsurface activity. Last time I checked, it was going to cost me $30,000 just to apply to NID for consideration of providing service.

Unkown beyond this is the actual cost of trenching, installing pipelines and meters.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Name: Charles M. Chisholm

Address: 11224 Orion Way, Grass Valley, CA 95949

Phone number: 530-913-3913
Email: charles.chisholm@sbcglobal.net

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 51: CHARLES CHISHOLM

Response to Comment B 51-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 52



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-12-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 52-1

Many Concerns! We are NO longer the "Wild West" where NO body cares about the Land, People. Live here. Many People! Mining is Just Not compatable with residential. Water: In a time of diminishing rainfall & impending drought It makes NO SENSE to pump thousands of gallons of water out of the ground and dump it!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Charles Lindquist

Address: P.O. Box 1121 Nevada City, CA 95959

Phone number: 530-723-9737

Email: GVRUNNER99@GMAIL.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 52: CHARLES LINDQUIST

Response to Comment B 52-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about the proposed project's compatibility with surrounding land uses, please refer to Chapter 4.9, Land Use and Population and Housing, of the DEIR. With regards to concerns about drought, please see Master Response 16.

Form Letter B 53

Dist 3

RECEIVED

FEB 16 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-12-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Many Concerns! We are NO longer the "wild west" where NO one cares about the land. People Live here. Many People! Mining is Not compatable with residental!

B 53-1

Water: In a time of deminishing Rain & impending drought it MAKES NO Sense to dump thousands of gallons of water out of the ground and dump it!

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Charles Lindquist

Name:
Charles Lindquist
Address:
P.O. Box 1121 Nevada City, CA 95959
Phone number:
530-723-9737
Email:
GVRUNNER99@gmail.com

FORM LETTER B 53: CHARLES LINDQUIST

Response to Comment B 53-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about the proposed project's compatibility with surrounding land uses, please refer to Chapter 4.9, Land Use and Population and Housing, of the DEIR. With regards to concerns about drought, please see Master Response 16.

Form Letter B 54

Dist 3

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-21-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

None of the benefits to the area touted to us; are useless. Every level of business here is short of workers. So we don't need jobs.

B 54-1 The potential for environmental harm is too great. Over & Over we read about environmental hazards that "could never happen", happening. Polluted water from Fracking IE. a big oops.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

C. Schmidt

Name: CHARLES SCHMIDT

Address: POB 2584 G VALLEY 95945

Phone number: 274 7116

Email: CNSCHMIDT75@GMAIL.COM

FORM LETTER B 54: CHARLES SCHMIDT

Response to Comment B 54-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 55

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 18 January 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My greatest areas of concern include:

B 55-1

- Past environmental record and business practices of Rise Gold management
- Doubts about the effectiveness of proposed treatment efforts to remove metals from the enormous amounts of water to be released into South Wolf Creek
- Significant additional energy requirements, particularly of fossil fuels and the associated air pollution from their exhaust
- Noise pollution from mining operations
- Fairly limited local economic benefits

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Chris Schneider

Address: 10491 Boulder St, Nevada City

Phone number: (530) 470-8468

Email: Schmed@TransPac.com

RECEIVED
JAN 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

FORM LETTER B 55: CHRIS SCHNEIDER

Response to Comment B 55-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek. With regard to concerns about air pollution and energy consumption, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Noise associated with the proposed project is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 56

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 18 January 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My greatest areas of concern include:

- Past environmental record and business practices of Rise Gold management
- Doubts about the effectiveness of proposed treatment efforts to remove metals from the enormous amounts of water to be released into South Wolf Creek
- Significant additional energy requirements, particularly of fossil fuels and the associated air pollution from their exhaust
- Noise pollution from mining operations
- Fairly limited local economic benefits

B 56-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Chris Schneider

Name: Chris Schneider

Address: 10491 Boulder St, Nevada City

Phone number: (530) 470-8468

Email: Schmed@TransPac.com

RECEIVED
JAN 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 56: CHRIS SCHNEIDER

Response to Comment B 56-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek. With regard to concerns about air pollution and energy consumption, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Noise associated with the proposed project is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 57

RECEIVED
FEB 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb-17-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons ar

Please see attached letter.

B 57-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: CHRISTIE HARRIS

Address: 16909 Brac Place, Grass Valley, Ca. 95949

Phone number: (530) 798-8480.

Email: N/A

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

17 feb-2022

Nevada Canty Supervisors and Commissioners,

I am writing to you with my concerns about the Idaho-Maryland Mine.
First, the amount of water which Will be used.
We are in a state wide drought and at times are told we cannot water our own yards. So pumping Millions of gallons of water from under Nevada Canty is not smart at all, and in NO way can it be a benifit to our County.
Another reason for high concern is, this county has had several sink holes over the years, some very large and very recent. If people start digging, drilling, and removing the ground out from underneith our Canty, which is now populated with Many people and Many types of buildings we will be in danger and at Risk of becoming a sink hole. Other Concerns I have about this mine opening, Without going into detail are, The increased fire danger to our County, the

p.2 17 feb 2022

impact on the Wildlife in our County which are already being Negatively impacted by all the Construction going on in our County, the waste the Mine will produce, the toxic harmful Waste, the list goes on.

I've read the information from Rise GrassValley, which tells how they will open the mine with No Noticable impact on our County, or its residence, and that is just not true.

If you approve the re-opening of the Idaho-Maryland Mine it will devastate our County, and destroy our local much loved Community as Well will have a direct Negative result on many of our Countys residence, their homes, properties, and their lives.

Thank you in advance for protecting Nevada County, and the decision to Not re-open the Idaho-Maryland Mine.

Sincerely,

Christie R. Harris.

16909 Brac place Gv.
(530) 798-8480

FORM LETTER B 57: CHRISTIE HARRIS

Response to Comment B 57-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. Impacts related to fire risks are addressed in Chapter 4.13, Wildfire, of the DEIR. Potential effects on wildlife are addressed in Chapter 4.4, Biological Resources, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 58

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 17 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
please see attached letter.

B 58-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Christie Harris

Name: CHRISTIE Harris

Address: 16909 Brac Place, Grass Valley, Ca. 95949

Phone number: (530) 798-8480

Email: N/A.

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS
Dist 2

17 feb-2022

Nevada Canty Supervisors and Commissioners,

I am writing to you with my Concerns about the Idaho-Maryland Mine.
First, the amount of water which Will be used.
We are in a state wide drought and at times are told we cannot water our own yards. So pumping Millions of gallons of water from under Nevada County is not Smart at all, and in NO way can it be a benifit to our County.
Another reason for high concern is, this county has had several sink holes over the years, some very large and very recent. If people start digging, drilling, and removing the ground out from underneith our Canty, which is now populated with Many people and Many types of buildings We will be in danger and at Risk of becoming a sink hole. Other Concerns I have about this mine opening, Without going into detail are, The increased fire danger to our County, the

p.2

17 feb 2022

impact on the Wildlife in our County which are already being Negatively impacted by all the Construction going on in our County, the waste the Mine will produce, the toxic harmful Waste, the list goes on.

Ive read the information from Rise GrassValley, which tells how they will open the mine with No Noticable impact on our County, or its residence, and that is just not true.

If you approve the re-opening of the Idaho-Maryland Mine it will devastate our County, and destroy our local much loved Community as Well will have a direct Negative result on many of our Countys residence, their homes, properties, and their lives.

Thank you in advance for protecting Nevada County, and the decision to Not re-open the Idaho-Maryland Mine.

Sincerely,

Christie R. Harris

16909 Boreal place Gv.
(530) 798-8480

FORM LETTER B 58: CHRISTIE HARRIS

Response to Comment B 58-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. Impacts related to fire risks are addressed in Chapter 4.13, Wildfire, of the DEIR. Potential effects on wildlife are addressed in Chapter 4.4, Biological Resources, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 59

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-14-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 59-1 I am quite concerned about the impacts This mine will have on local noise pollution, traffic, ground water levels and air pollution. I'm also not impressed with the way Rise Gold Corps has handled previous projects.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Christina Sabin

Name: Christina Sabin

Address: 11147 Squirrel Creek Rd, Grass Valley, CA 95945

Phone number: 530-274-3447

Email: christina.sabin@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 59: CHRISTINA SABIN

Response to Comment B 59-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Impacts related to noise are addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Impacts related to traffic are addressed in Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Impacts related to air pollution are addressed within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 60

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2-14-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I am quite concerned about the impacts this mine will have on local noise pollution, traffic, ground water levels and air pollution. I'm also not impressed with the way Rise Gold Corps has handled previous projects.

B 60-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Christina Sabin

Name: Christina Sabin
Address: 11147 Squirrel Creek Rd, Grass Valley, CA, 95945
Phone number: 530-274-3447
Email: christina.sabin@gmail.com

FORM LETTER B 60: CHRISTINA SABIN

Response to Comment B 60-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Impacts related to noise are addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Impacts related to traffic are addressed in Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Impacts related to air pollution are addressed within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 61

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/29/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 61-1

I recently moved here from Los Angeles to be in a quiet area, in nature, away from noise pollution - and away from traffic. Also I suffer from chronic bronchitis and adding more air pollution is a big concern.

I'm also concerned about the economic impact, the value of my home and the loss of tourism.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Christine Feodorov

Address: 10407 S. PONDEROSA WAY, ROUGH + READY, CA 95975

Phone number: 562-665-5312

Email: run2west@yahoo.com

RECEIVED
FEB 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 61: CHRISTINE FEODOROV

Response to Comment B 61-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns, including property values, are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Impacts related to air pollution are addressed within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 62

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

There is a serious risk to our health, our environment, our property value and our peace and quiet. There is already an increase in cancer in our county, perhaps due to previous mining industry. As a cancer survivor, I can not support this industry.

B 62-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Cindy Foxcroft

Name: Cindy Foxcroft

Address: 418 Factory St Nevada City, CA 95959

Phone number: 530-559-2009

Email: cindyfox@gv.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 11 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 62: CINDY FOXFOOT

Response to Comment B 62-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 63

Dist 1

RECEIVED

FEB 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The serious risk to our health, our environment, our property values and our peace and quiet. There is already a high incidence of cancer in our county, perhaps due to previous mining. As a cancer survivor, I can NOT support this industry.

B 63-1

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Cindy Foxfoot

Name: Cindy Foxfoot

Address: 418 Factory St Nevada City CA 95959

Phone number: 530-559-2009

Email: Cindyfox@gv.net

FORM LETTER B 63: CINDY FOXFOOT

Response to Comment B 63-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 64

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/26/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I have a thyroid disease, and environmental pollutants and heavy metals that result from mining operations greatly worsen my condition and symptoms. Many autoimmune diseases can be triggered by pollutants as well, and I believe the proposed mitigating actions are not sufficient to prevent damage to the wellbeing of the citizens of Grass Valley.
- The mine will pollute our air and increase lung disease. Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley. Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives. As someone who has struggled with health problems, I do not want to see an epidemic of new medical conditions in the county, especially for my family and friends.
- We have seen long lasting and devastating effects of mining in this town over the decades. One event that sticks in my mind is the sinkholes that collapsed all over the county, including at my old middle school, Union Hill, whose field had a sinkhole for months and they could not use the area. A mining operation would only contribute to more potential calamities such as this in the future. Operations will include blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- The water in the Grass Valley is one of its most precious and greatest commodities for the citizens who live here. Not only is it important to preserve the water table, but preventing contamination of that water is imperative to those who use well water. The mining operations would require removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells. Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide, and lead with disastrous effects for downstream ecosystems - proving that even from decades and decades of time, past mining destruction is still visible today.

B 64-1

RECEIVED
MAR 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

- This would be on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential). Operations will include crushing 1,500 tons of mine waste every day, all day, using massive machines. Trucks will be hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site. Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)
- The history and business practices of Rise Gold do not inspire trust. Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts. Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date. There are many questions as to the financial stability of this company. The costs of allowing this mining operation do not outweigh the minor benefits claimed by the advertising campaign of the company.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,



Name: Courtney Andes-McCullough

Address: 14015 Live Oak Lane, Grass Valley, CA 95945

Phone number: (530) 798-0640

Email: cjam11219@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 64: COURTNEY ANDES-MCCULLOUGH

Response to Comment B 64-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Finally, regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 65

Dist 1

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/21/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I have a thyroid disease, and environmental pollutants and heavy metals that result from mining operations greatly worsen my condition and symptoms. Many autoimmune diseases can be triggered by pollutants as well, and I believe the proposed mitigating actions are not sufficient to prevent damage to the wellbeing of the citizens of Grass Valley.
- The mine will pollute our air and increase lung disease. Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley. Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives. As someone who has struggled with health problems, I do not want to see an epidemic of new medical conditions in the county, especially for my family and friends.
- We have seen long lasting and devastating effects of mining in this town over the decades. One event that sticks in my mind is the sinkholes that collapsed all over the county, including at my old middle school, Union Hill, whose field had a sinkhole for months and they could not use the area. A mining operation would only contribute to more potential calamities such as this in the future. Operations will include blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- The water in the Grass Valley is one of its most precious and greatest commodities for the citizens who live here. Not only is it important to preserve the water table, but preventing contamination of that water is imperative to those who use well water. The mining operations would require removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells. Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide, and

B 65-1

lead with disastrous effects for downstream ecosystems - proving that even from decades and decades of time, past mining destruction is still visible today.

- This would be on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential). Operations will include crushing 1,500 tons of mine waste every day, all day, using massive machines. Trucks will be hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site. Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)
- The history and business practices of Rise Gold do not inspire trust. Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts. Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date. There are many questions as to the financial stability of this company. The costs of allowing this mining operation do not outweigh the minor benefits claimed by the advertising campaign of the company.

I am a resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Courtney Andes-McCullough

Address: 14015 Live Oak Lane, Grass Valley, CA 95945

Phone number: (530) 798-0640

Email: cjam11219@gmail.com

FORM LETTER B 65: COURTNEY ANDES-MCCULLOUGH

Response to Comment B 65-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Finally, regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 66

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/5/22

Dist 1

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- An estimated 85% of vendor spending will not be local
- Rise Gold CEO, Ben Mossman, has been charged with environmental violations in B.C. Canada.
- The relatively few theoretical jobs gained will not offset the harm done.
- Underground blasting is planned for 7 days a week and will be felt by those living above. **B 66-1**
- While Rise Gold shareholders profit, the local community gets little revenue.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: CRAIG WEAVER

Address: 14143 Raccoon Mountain Rd

Phone number: (530) 802-1132

Email: quality.carpentry@sbcglobal.net

FORM LETTER B 66: CRAIG WEAVER

Response to Comment B 66-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 67

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1-27-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pollution to our air, water and environment.

B 67-1



I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

CBailey

Name: Cynthia K. Bailey

Address: 137 Boulder St. Apt. F Nevada City, CA 95959

Phone number: 530-559-3369

Email: sindee bee@yahoo.com

FORM LETTER B 67: CYNTHIA BAILEY

Response to Comment B 67-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 68

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-19-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I agree and know of the negative impacts. Tax money is not worth it to the Common Citizens who will lose wells, homes, and the environmental impact is obvious.

B 68-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Cynthia Keck
Address: 10217 Kenwood Dr. GV, CA 95949
Phone number: 530-277-7112
Email: CynthiaK456@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 68: CYNTHIA KOCH

Response to Comment B 68-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 69

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/3/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 69-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, David Lindsey

Name: David Lindsey

Address: 12268 Brem Ln, Nevada city, CA. 95959

Phone number: 530-559-2050

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 69: DAVID LINDSEY

Response to Comment B 69-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 70

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb 10, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 70-1 our water shed and water ways continue to be negatively impacted ~~by~~ already. DO NOT continue the destructive process. Our way of life deserves better treatment and consideration, DO NOT allow this travesty to degrade our natural resources any further.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Deanna Bloom

Address: 800 Freeman Ln #308

Phone number: [redacted] No TEXT or phone calls please

Email: deannabloom2@comcast.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 70: DEANNA BLOOM

Response to Comment B 70-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 71

Dist 3

RECEIVED
FEB 14 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 10, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 71-1

our waterways & watershed are already in severe distress, in great part because of mining, even though it was long ago.

Opening this mine will not bring an enhanced way of life to Nevada County residents

DO NOT allow this travesty to continue to degrade our natural resources any further.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Deanna Bloom
Address: 800 Freeman Ln. #308
Phone number: ~~text~~ NO text or phone calls please
Email: deannabloom2@comcast.NET

FORM LETTER B 71: DEANNA BLOOM

Response to Comment B 71-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 72

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-6-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 72-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: DEANNA M. RONNINGEN

Address: 17139 CLOVER RD PENN VALLEY CA 95946

Phone number: 530 9134342

Email: kdronningen@aol.com

RECEIVED
FEB 11 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 72: DEANNA RONNINGEN

Response to Comment B 72-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 73

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

A major gold mining operation in a residential neighborhood is terrible planning.

B 73-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Deborah Bridges

Name: Deborah Bridges

Address: 11225 Vista Ave, G.V.

Phone number: 530 274-7889

Email: deborah@studiobridges.com

RECEIVED
FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 73: DEBORAH BRIDGES

Response to Comment B 73-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 74

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS
Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

a ~~very~~ major and intense industrial use in a residential neighborhood is very destructive and should not be approved.

B 74-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Deborah Bridges

Name: Deborah Bridges

Address: 11225 Vista Ave. Grass Valley, CA 95945

Phone number: 530 274 7889

Email: Deborah@studiobridges.com

FORM LETTER B 74: DEBORAH BRIDGES

Response to Comment B 74-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 75

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/22/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 75-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Denis Hill

Address: 11963 Banner Ct, Nevada City, CA, 95959

Phone number: 925-323-2005

Email: denis.colin.hill@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 75: DENIS HILL

Response to Comment B 75-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 76

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3.1.22

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 76-1

please don't approve it for the money, in the long run it won't be worth it! (You know this)

Thanks, and please do the right thing!

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Denise Martin

Name: DENISE MARTIN

Address: 113 LIDSTER AVE. G.V. CA 95945

Phone number: (530) 802.1617 call or txt.

Email:

FORM LETTER B 76: DENISE MARTIN

Response to Comment B 76-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 77

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3.1.22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Please do the right thing, and don't approve the mine for the money!

B 77-1

You know deep down that it won't be worth it in the long run

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Denise Martin

Name: DENISE MARTIN

Address: 113 Lidster ave. Grass Valley CA 95945

Phone number: 530) 802.1617

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 77: DENISE MARTIN

Response to Comment B 77-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 78

Dist 2

RECEIVED
Date: FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 78-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Dennis Geare
Address: 10470 Sky Circle, Grass Valley 95949
Phone number: 530. 263. 1648
Email: ~~dgeare~~ dgeare@gmail.com

Dennis Geare

FORM LETTER B 78: DENNIS GEARE

Response to Comment B 78-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 79

Dist 4

RECEIVED

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/21/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 79-1

Environmentally, this is a very BAD move. Please protect our natural environment from being destroyed – Water usage, waste water, heavy loud machinery, Trucks (Air quality + noise) Mining dust (+ what's in it that's detrimental to the health). None of this is positive. The amount of jobs provided isn't worth the long term damage this will cause. Please Vote NO on reopening the mine!

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Dominica Mottarella

Name: Dominica Mottarella

Address: PO Box 923 NSJ CA 95960

Phone number: 530 292 0176

Email: indianenticabile1@yahoo.com

FORM LETTER B 79: DOMINICA MOTTARELLA

Response to Comment B 79-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 80

Not a county resident

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
2022
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 19 Jan

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

B 80-1

There are many reasons this mine should NOT be reopened. Personally, I feel that it is inconsistent with the values of the community that we share with our family and friends in Nevada County.

Donna Burke

Donna Burke, 2201 Hillcrest Dr. Ventura CA 93001

805 798 5808

ddsburke2201@gmail.com

FORM LETTER B 80: DONNA BURKE

Response to Comment B 80-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 81

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 19 Jan 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

B 81-1

There are many reasons this mine should NOT be reopened. Personally, I feel that it is inconsistent with the values of the community that we share with our family and friends in Nevada County.

Donna Burke

Donna Burke, 2201 Hillcrest Dr. Ventura CA 93001

ddsburke2201@gmail.com

805 798 5808

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 81: DONNA BURKE

Response to Comment B 81-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 82

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb. 14, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 82-1

a distrust of Rise Gold to adhere to their promises leaving our county to clean up the mess that the mine will surely cause. With all the cons to this mine I cannot believe that our Planning Commission would put our county at risk to all the downside of opening up this mine.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Dorothy K Stone

Name: DOROTHY K STONE

Address: 195 CYPRESS HILL DR.
GRASS VALLEY CA 95945

Phone number: 530-272-1666

Email: _____

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 82: DOROTHY STONE

Response to Comment B 82-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 83

Dist 3

RECEIVED

FEB 18 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 14, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

a distrust of Rise Gold to adhere to their promises leaving our County to clean up the mess that the mine will surly cause. With all the cons to this mine I cannot believe that our Supervisors would put our County at risk to all the downside of opening up this mine.

B 83-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Dorothy K Stone

Name: DOROTHY K STONE

Address: 195 CYPRESS HILL DR.
GRASS VALLEY, CA 95945

Phone number: 530 - 272 - 1666

Email: ———

FORM LETTER B 83: DOROTHY STONE

Response to Comment B 83-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 84

RECEIVED

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/22/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 84-1

My studio/shop is located on Loma Rica near the airport and I'm concerded the impact of this mine will be immediately felt by myself and my neighbors. The traffic conditions are currently tolerable, however with the additional traffic it would become unacceptable and very problematic and unaccomidating.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Douglas NORE

Address: 12354 Loma Rica

Phone number: 520 395 7995

Email: dugo_arts@mac.com

FORM LETTER B 84: DOUGLAS NORE

Response to Comment B 84-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about increased traffic resulting from the proposed project, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 85

Dist 1

RECEIVED
2022 Date: 1/21/22
COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The EIR report is bare minimum requirements for projects.
- We live in an area where wells are often impacted by water levels that vary where mine shafts exist - this was our case living on Banner Mtn.
- This company is not fiscally reputable. See attached article, written by a bankruptcy judge.

B 85-1

- We have seen the devastation of mining projects still trying to heal. Why do this to our community again?

** This corporation will never be solvent enough to cover their disasters. That cost will fall on the county.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Eileen Blodgett

Name: Eileen Blodgett

Address: 11225 Golden Oaks Ct
Nevada City CA 95959

Phone number: 530 277 9919

Email: eileen@eileenblodgett.com

FORM LETTER B 85: EILEEN BLODGETT

Response to Comment B 85-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 86

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/21/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The EIR report is bare minimum requirements for projects.
- We live in an area where wells are often impacted by ground water levels - and can vary where mine shafts exist - this was our case living on Banner Mtn.
- This company is not reputable. See attached article.

B 86-1

- We have seen the devastation of mining projects still trying to heal. Why do this to our community again?

** This corporation will never be solvent enough to cover their disasters. That cost will fall to the county.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Eileen Blodgett

Name: Eileen Blodgett

Address: 11225 Golden Oak Ct
Nevada City CA 95959

Phone number: 530 277-9919

Email: eileen@eileenblodgett.com

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

Thar's gold in promises?

OTHER VOICES
Randall J. Newsome

Of all the lofty promises Rise Gold has churned out over the preceding months, none has been more ballyhooed than the number of jobs the mine would create, and the $94,000 average annual wage they'll pay. Before anyone runs to get in line for one of these dream jobs, let's take a closer look.

First, it appears to require a considerable amount of magical thinking to believe the company will ever create a single job. According to its most recent SEC 10-Q report, Rise had less than $400,000 in the bank as of Oct. 31, 2021. By its own reckoning, it needs to plow $100 million into the facility before it can mine its first ounce of gold. It is grossly undercapitalized, to put it mildly, and teetering on the brink of insolvency.

Second, the $94,000 number is totally misleading. According to its March 2021 economic impact report, Rise estimates that it will employ "312 people in Nevada County at full operating levels." Note that it may take years before "full operating levels" are reached.

Putting that aside, the company says that its annual payroll (not including benefits) for these 312 employees will be $29,220,000. It provides no explanation for how it arrived at this number. Rise then provides a list of job categories and an estimate of employees per category.

What it doesn't provide is detail as to the average pay for each employee in each category. Only 213 of the potential 312 employees would be local hires, and of that 213, 162 of them would be "local trainees." Does anyone really think that Rise is going to pay a trainee $94,000 a year?

According to Comparably.com and other sources, the average wage for underground gold miners in the United States is less than $50,000. Even after these 213 local hires are fully trained, does anyone really think Rise will pay almost twice that national average?

So how did they arrive at the $94,000 number? Simple — if you take 312 and divide it into their made-up annual payroll of $29,220,000, you'll come up with just under $94,000.

By lumping together the salaries of managers (all of which are listed as "non-local hires"), engineers, geologists and other highly paid jobs with the lower-paid miners and mineral processors, the company has provided what I consider a false representation of what someone who lives in our community might actually expect to earn at Rise.

There is a great deal more in the Rise economic impact report that is of questionable validity. That's why the Board of Supervisors was right to commission its own economic impact report. But all the board or anyone else needs to know about the Rise report is found in italics on the second page:

Mineral resources that are not mineral reserves do not have demonstrated economic viability. Rise Grass Valley has not established mineral reserves supported by a feasibility study.

Rise Grass Valley has not completed a feasibility study to establish mineral reserves, and therefore has not demonstrated economic viability of the Idaho-Maryland Mine.

In other words, the Rise business model appears to be built on sheer speculation, which begs the following question: Why is the county continuing to spend valuable time and money on this project?

The only explanation I've heard is that the board has to follow the legal process. Does that mean that every time a carload of people comes to town with an undercapitalized, half-baked, potentially dangerous business scheme and starts throwing around empty promises, the board is required to take it all seriously?

Due process only requires whatever process that's due under the circumstances, not a seemingly endless process in pursuit of a fantasy. Isn't it time for this particular fantasy to end?

Randall J. Newsome lives in Nevada City.

* Randall Newsome is a retired bankruptcy judge.

Letters to the editor

Goodwill amid the storm

We live on Ball Road in Alta Sierra in the region hit with the worst of the worst storm devastation. From Highway 49 the corridor, Alta Sierra Drive, Ball Road, Francis to Dog Bar Road, roughly 75% of the power poles and power lines were downed by falling trees.

We want to express our thanks to the tree cutters who allowed us to drive to town, to PG&E who called in all the troops to get lines and power poles replaced, and especial-

vaccine exemption offered, in addition to 15% of staff.

My question: Where is the survey of how many parents and staff would pull their students or refuse to work, for their own safety, if a vaccine exemption is offered?

Let's look at both sides before coming to a decision on this thorny issue.

Charles Lanau
Nevada City

A time of introspection

This is a note of gratitude for PG&E, which

I can fully wonder how our forebears met these conditions.

Marsha Ostrom
Nevada City

Single-payer better for business

If Fran Freedle's letter to the editor in Saturday's Union frightened you about new taxes proposed to fund single-payer health care, please read this perspective on those numbers. How much are you paying in health insurance now?

Consider premiums,

proposed new excise tax of 2.3% of gross receipts only applies to the amount over $2 million, most of our local businesses would be exempt.

In the proposed payroll tax, the employer share is 1.25% on employers with more than 50 employees. Most Californians get their health coverage through their jobs, so those employers are providing health insurance.

A 1.25% tax should be a bargain compared to paying for their employees' insurance. Employees making over $49,900

FORM LETTER B 86: EILEEN BLODGETT

Response to Comment B 86-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 87

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1 February 2022

Dist 3

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am fervently opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation.

I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons I believe this mine should NOT be reopened. My foremost personal reasons are:

Based on past behavior, I believe we can very confidently predict that this company will not keep its promises. That is the overriding consideration, it seems to me, and I don't think anything else needs to be discussed. This is a company whose CEO was the CEO of another company that went bankrupt rather than keep its promises. This is a deal-breaker. This is what indicates to me whether a contract or a promise from this company is worth anything at all. I cannot imagine how we could agree to entrust our environment to this company.

If, in light of the CEO's track record, other reasons are needed, it is my personal feeling that cleanup or restoration, under the best circumstances, can never restore our beautiful and complex living web of land, trees, streams, and all the creatures and organisms that live in and on it to anywhere near their original wholeness.

B 87-1

And, for one more in a myriad of objections, I cannot imagine how the dewatering of the mine would not lower the water table. Water flows downward; when space is made for it, by dewatering the mine, more will flow downward, draining groundwater. Besides the drying up of wells – which, to my mind, would not be adequately compensated for by supplying bottled water or treated water – it seems to me that it could cause further stress to our trees, and thus worsen the danger of fire. Stressed trees and fire danger are already big problems – we don't need more of this.

I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Eileen Adele Hale

Name: Eileen Adele Hale

Address: 10833 Pine Hill Drive, Grass Valley, California 95945

Phone number: (530)273-1351

Email: eileenmice@eileenadelehale.com

FORM LETTER B 87: EILEEN HALE

Response to Comment B 87-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Impacts related to fire risks are addressed in Chapter 4.13, Wildfire, of the DEIR.

Form Letter B 88

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-23-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I live on Marion Canyon Rd, off of Greenhorn. 2 neighbors and myself felt the vibrations when Rise Gold Corp. were doing demolitions last year. At first none of us knew what it was and "assumed" it was earthquake tremors, until we found out what it was. If we can feel what they were doing underground, how many more residents felt it also. I'm planning to sell my home this year and am wondering if I should disclose this info to my estate agent?

B 88-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,
Elizabeth McGuire

Name:

Address: 13104 Marion Cyn. G.V. 95945

Phone number:

Email: eandmmcguire@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 03 2022

FORM LETTER B 88: ELIZABETH MCGUIRE

Response to Comment B 88-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 89

RECEIVED

MAR 0 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-23-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I live on Marion Canyon Rd, off Greenhorn.
2 neighbors and myself felt the vibrations when Rise Gold Corp. were doing demolitions last year. At first none of us knew what it was and "assumed" it was earthquake tremors until we found out what it was. One neighbor felt them all night long. If we can feel what they were doing underground, how many more residents felt it also. I'm planning to sell my home this year, am I required to disclose this information to my estate agent?

B 89-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Elizabeth McGuire

Name:

Address: 13104 Marion Cyn Rd G.V. 95945

Phone number:

Email: eandrmcguire@gmail.com

FORM LETTER B 89: ELIZABETH MCGUIRE

Response to Comment B 89-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 90

10157

RECEIVED

JAN 24 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 90-1

the effect on the environment is too great - negative effect. The pollution - noise, air, water are all way to great to consider this. It would not ~~going to~~ bring anything positive to the community - yes some jobs - but the cost to the environment is too great

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Francesca Erickson

Name: FRANCESCA ERICKSON

Address: 144 Success Mine Loop, Grass Valley 95945

Phone number: (530) 205-9751

Email: frannyerickson@hotmail.com

FORM LETTER B 90: FRANCESCA ERICKSON

Response to Comment B 90-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 91

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 91-1

The deleterious affect on the environment - air, water, noise, road damage - is way too big to consider this project. How is it that people cannot see that our planet needs to be the 1st consideration. I've never heard of anything positive to come of this. A few jobs cannot compensate for the losses.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Sincerely,

Francesca Erickson

Name: FRANCESCA ERICKSON

Address: 144 Success Mine Loop, Grass Valley 95945

Phone number:

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 91: FRANCESCA ERICKSON

Response to Comment B 91-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 92

Nevada County Planning Commission
950 Maidu Ave, Suite 170
Nevada City, CA 95959

February 28, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have read the Rise Gold Mine postcards they sent recently. The information is misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project at the detriment of our community.

B 92-1

Gold mining is the world's worst business. It's capital-intensive. It's labor-intensive. Gold miners are ultra-sensitive to movements in the price of gold. When gold moves higher a gold mining company can get capital. When it moves lower, and the investors had enough with the industry they leave and find another opportunity. The 2013-2019 downturn in gold prices was the final straw for many investors. And companies like Rise Gold had little ability to raise money to run the business. Rise Gold is a bit player in the industry. They won't be around when gold plunges. They won't be around to clean up the toxic waste. They will go bankrupt and leave California and go back to Canada where they are well protected.

I have been a Nevada County resident since 2005 and see that Rise Gold wants to risk our environment and the people who live here for their profit. I am confident that you will value my input and comments and the comments from thousands of other residents. I hope all of you will be on the right side of history and protect our community from fraudsters like Rise Gold Mine.

Thank you,
Francis Murphy

11202 Oak Canyon Drive
Penn Valley, CA 95946
916-397-5441

RECEIVED
MAR 03 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 92: FRANCIS MURPHY

Response to Comment B 92-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 93

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-10-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Keep our ENVIRONMENT healthy!

B 93-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Fred Slikker
Vickie Tobey

Name: Fred Slikker Vickie Tobey

Address: P.O. Box 1404 NC 95959

Phone number:

Email:

RECEIVED
FEB 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 93: FRED SLIKKER AND VICKIE TOBEY

Response to Comment B 93-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 94

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/23/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- the mine will pollute our air & increase lung disease
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of well

B 94-1

- Blasting 7 days a week in the tonnels undre 2,585 acres of the Grass Valley area

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Gabrielle Neal

Name: Gabrielle Neal

Address: ~~xcrunnergirl277@gmail.com~~ 122 Berriman loop, 95949 Grass Valley CA

Phone number: (231) 715-8082

Email: xcrunnergirl277@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 94: GABRIELLE NEAL

Response to Comment B 94-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 95

Date: 3/23/22

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:



B 95-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Gary ~~+ Pam~~ Kisor
Address: 12579 Lakeshore North
Phone number: 6266221615
Email: ~~Pamkisor~~ @ gmail.com
G E Kisor

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER B 95: GARY KISOR

Response to Comment B 95-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 96

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/23/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:



B 96-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Gary Kisor
Address: 12579 Lake Shore North
Phone number: 626 622 1614
Email: GKKisor@Gmail.com

FORM LETTER B 96: GARY KISOR

Response to Comment B 96-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 97

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/3/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We do not need any added risk to our health or our environment.

B 97-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, gayle a costanza

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: GAYLE COSTANZA

Address: 859 FREEMAN LN GRASS VALLEY

Phone number: 925-787-6861

Email: gaylecostanz@comcast.net

FORM LETTER B 97: GAYLE COSTANZA

Response to Comment B 97-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 98

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/29/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 98-1 My fiancée suffers from bronchitis. Much of the reason we moved out of Los Angeles up here in December was in search of better air quality. The pollution caused by the mine will cause us to move again when we just got here.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Geoff Erwin

Address: 10407 S. PONDEROSA WAY, ROUGH & READY, CA 95975

Phone number: 310-403-0909

Email: TreeFallsEnt@Gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 98: GEOFF ERWIN

Response to Comment B 98-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 99

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS
02-04-2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dist 3

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

B 99-1

There are many reasons this mine should NOT be reopened. My reason is simple. The risk (environmental calamities, reduced property values, noise and traffic issues) is not worth the reward (a few new jobs and more gold to be stored in vaults around the world).

I am a resident of Nevada County and believe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Geoff Pollard
800 Freeman Lane Apt 301
Grass Valley, VA 95949

925-323-4349
gppollard@gmail.com

FORM LETTER B 99: GEOFF POLLARD

Response to Comment B 99-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 100

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: February 11, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.

B 100-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Name: George Dunstan

Address: 19595 Bow Valley Rd, Grass Valley, CA 95945

Phone number: 530-205-8159

Email: gvgeode@gmail.com

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 100: GEORGE DUNSTAN

Response to Comment B 100-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Electricity consumption is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 101

Dist 1

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 11, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.

B 101-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: George Dunstan

Address: 19595 Bow Valley Rd, Grass Valley, CA 95945

Phone number: 530-205-8159

Email: gvgeode@gmail.com

FORM LETTER B 101: GEORGE DUNSTAN

Response to Comment B 101-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Electricity consumption is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 102

Dist 3

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 19, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 102-1 Nevada County should value its scenic beauty for our enjoyment and to attract tourism. We do not need wetland destruction, toxic waste and major traffic and noise increases

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Gillian Blair

Name: Gillian Blair

Address: 12668 Nottingham Lane, GV 95949

Phone number: 831-588-1155

Email: gillianblair@gmail.com

FORM LETTER B 102: GILLIAN BLAIR

Response to Comment B 102-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 103

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 19, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 103-1 Nevada County should value its scenic beauty for our enjoyment and to attract tourism. We do not need wetland destruction, toxic waste, and major noise and traffic increases.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Gillian Blair

Name: Gillian Blair
Address: 12668 Nottingham Lane, GV 95949
Phone number: 831-588-1155
Email: gillianbblair@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022

FORM LETTER B 103: GILLIAN BLAIR

Response to Comment B 103-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 104

HIST 1

RECEIVED
JAN 2 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan. 24, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 104-1

We are very concerned about the pollutants that will be unleashed into our community. A few outsiders will profit and our citizens will be left with toxic water, polluted air, obnoxious noise, increased truck traffic, increased health problems into the future. Please consider the mining history of this area and how the gov. is still trying to clean up the environmental mess left behind. Do not repeat this history of destroying our environment.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Gordon Keller, Marika Keller

Name: Gordon and Marika Keller
Address: 118 Ascot Pl, Grass Valley, CA 95949
Phone number: (530) 457-7372
Email: Gordonmarika@aol.com

FORM LETTER B 104: GORDON KELLER AND MARIKA KELLER

Response to Comment B 104-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 105

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 24, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We are very concerned about the environmental impacts on our community. The multitudes of large trucks contributing to air pollution as well as generating obnoxious sounds is disruptive to our Community. The toxic waste from mining will contaminate our beautiful environment & cause more illness in our citizens.

B 105-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Gordon Keller, Marika Keller

Name: Gordon Keller and Marika Keller

Address: 118 Ascot Pl., Grass Valley, CA 95949

Phone number: (530) 457-7372

Email: Gordonmarika@aol.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington



FORM LETTER B 105: GORDON KELLER AND MARIKA KELLER

Response to Comment B 105-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 106

0575

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 106-1 The clear potential of negative impacts on the enviroment with lack of true economical impact of positive value.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Gregory Clary

Address: 448 Colfax Ave

Phone number: 530. 205. 9337

Email: auriel.aeon@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 106: GREGORY CLARY

Response to Comment B 106-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 107

RECEIVED

FEB 07 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-2-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 107-1

There is no way the sound, air and water pollution can be effectively mitigated. This changes our way of life and property values in our community. Sound & pressure amplifies in the tunnels. Our homes and senses will be bombarded 24hrs a day. Our emotional health in this community will be at risk. ~~along~~

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Gwendolyn Fissel

Address: 262 Barby Dr, Grass Valley 95945

Phone number: (530) 559-2674

Email: glfissel@yahoo.com

FORM LETTER B 107: GWENDOLYN FISSEL

Response to Comment B 107-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 108

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan, 22 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 108-1

Hard rock mining is the single largest source of toxic waste in the U.S.
Waste water will be dumped into S. Fork Wolf Creek destroying habitat + stir up existing toxic residue
Removal of 1 million - 3million gallons of contaminated water per day for the next 30 years de watering wells

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Hazel Grace Yates

Address: 19693 St Hwy 49, Nevada City CA 95959

Phone number: 970 333 4035

Email: Hazelgraceyates@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

JAN 24
NEVADA COUNTY

FORM LETTER B 108: HAZEL YATES

Response to Comment B 108-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 109

Heather Fleming

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan 22, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 109-1

Use of over 12% of N.C. electricity, more than all the county biz combined
Waste water will be dumped into S. Fork Wolf Creek destroy habitats + stir up existing toxic residue such as mercury, cyanide + lead w/ disastrous effects for down stream ecosystems
Where will the imported workers live when housing is already limited?

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Hazel Yates

Name: Hazel Yates

Address: 19693 St Hwy 49, Nevada City CA 95959

Phone number: 970 333 4035

Email: hazelgraceyates@gmail.com

FORM LETTER B 109: HAZEL YATES

Response to Comment B 109-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Electricity consumption is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 110

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 28, 2022



Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 110-1

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Vast amounts of diesel exhaust will be produced from continuous operation.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Business that depends on tourism will be hurt.
- The relatively few theoretical jobs gained will not offset the harm done.
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be

known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,



Name: Henry Goodman

Address: 10294 Whispering Oaks Lane, Nevada City, CA 95959

Phone number: 530 478-1038
Email: henrygoodman@hotmail.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 110: HENRY GOODMAN

Response to Comment B 110-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 111

RECEIVED
FEB 0 2 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 28, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.

B 111-1

- Vast amounts of diesel exhaust will be produced from continuous operation.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
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- Business that depends on tourism will be hurt.
- The relatively few theoretical jobs gained will not offset the harm done.
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- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Henry Goodman

Name: Henry Goodman

Address: 10294 Whispering Oaks Lane, Nevada City, CA 95959

Phone number: 530 478-1038

Email: henrygoodman@hotmail.com

FORM LETTER B 111: HENRY GOODMAN

Response to Comment B 111-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

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Form Letter B 112

RECEIVED
FEB 0 2 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 28, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

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- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
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- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Business that depends on tourism will be hurt.
- The relatively few theoretical jobs gained will not offset the harm done.
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.

B 112-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Henry Goodman

Name: Henry Goodman

Address: 10294 Whispering Oaks Lane, Nevada City, CA 95959

Phone number: 530 478-1038

Email: henrygoodman@hotmail.com

FORM LETTER B 112: HENRY GOODMAN

Response to Comment B 112-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 113

Dist 1

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1-19-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 113-1

Please do not vote in favor of this mine. Mines have been proposed for Grass Valley for decades, and former government officials have seen the wisdom of barring this toxic, polluting, noisy action from our area. Don't be the officials who close your eyes and minds and allow the destruction of our community.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Diana Abrell

Address: 12319 Hillcrest Dr., NC

Phone number: 530-273-3095

Email: star_flower@comcast.net

FORM LETTER B 113: ILIANA ABRELL

Response to Comment B 113-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 114

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1-19-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 114-1 Please do not vote in favor of this mine. Mines have been proposed for Grass Valley for decades, and former government officials have seen the wisdom of barring this toxic, polluting, noisy action from our area. Don't be the officials who close your eyes and minds and allow the destruction of our community.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Diana Abrell

Address: 12319 Wildcrest Dr., NC

Phone number: 530-273-3095

Email: star_flower@comcast.net

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 114: ILIANA ABRELL

Response to Comment B 114-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 115

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

It negatively affects all areas of this community from air quality to noise and dust and water and traffic.
And it's not a financially responsible company that's leading this re-opening.

B 115-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Ingegerd Hjord

Address: 10965 BOULDER STREET, NEVADA CITY

Phone number: 530 263 2959

Email: ihjord@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 11 2022

FORM LETTER B 115: INGEGERD HJORD

Response to Comment B 115-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 116

Dist 1

RECEIVED

Date: FEB 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The proposal has issues with air pollution and green house gas emissions, noise, lights, dust, vibration, truck traffic, explosions, extreme power requirements, millions of gallons of water pumped daily and radical changes to the community.

B 116-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Ingegerd Hjord

Address: 10465 BOULDER STREET, NEVADA CITY

Phone number: 530 263 2959

Email: ihjord@gmail.com

FORM LETTER B 116: INGEGERD HJORD

Response to Comment B 116-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 117

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 31, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 117-1 I've been coming here for almost 40 years. I return to visit friends, breathe clean air, view peaceful foothill environment and QUIET. I shop in lovely, small shops, eat in delightful restaurants and walk + hike in the quiet and clean air. My research shows that pollution and ongoing noise from traffic and mining operations would negatively impact all of that. summer + vacation visitors I rent in Grass Valley

I am a Nevada County ~~resident~~ and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

J. Anne Lyon

Name: J. Anne Lyon

Address: 551 Lamont Ct, S Rohnert Park, CA 94928

Phone number: 619-933-1618

Email: mountan b@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 02 2022
NEVADA COUNTY PLANNING DEPARTMENT

FORM LETTER B 117: J. ANNE LYON

Response to Comment B 117-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 118

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/31

Dist 1

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

WE DON'T NEED THE POLLUTION !!!
NOISE!!!

B 118-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

J.E. WILKINSON

Name: J.E. Wilkinson

Address: 12768 BANNER LAVA CAP RD.

Phone number:

Email: NICKIEJIM@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 118: J.E. WILKINSON

Response to Comment B 118-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 119

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) The mine will pollute our air & increase lung diseases.
2) Clouds of airborne toxic mining dust including asbestos, will drift downward into Grass Valley.
3) Waste water will be dumped into South Fork Wolf creek, destroy habitats & stir up historic toxic residues like mercury, cyanide & lead. I enjoy walking on the beautiful, paved wolf creek trail almost daily. Thank you to the City of Grass Valley for the trail!

B 119-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Jacque Bromm

Address: 800 Freeman Lane #102

Phone number: 530-613-3643

Email: jacquebromm@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 119: JACQUE BROMM

Response to Comment B 119-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 120

Dist 3 RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: FEB 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) The mine will pollute our air & increase lung disease
2) Clouds of airborne toxic mining dust, including asbestos, will drift downward into Grass Valley
3) Waste water will be dumped into South Fork Wolf creek, destroy habitat & stir up existing toxic residues like mercury, cyanide & lead. I enjoy walking on the beautiful, paved wolf creek trail almost daily.

Thank you to the city of Grass Valley for the trail!

B 120-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jaque Bromm
Address: 800 Freeman Ln. #102
Phone number: 530-613-3643
Email: jacquebromm@gmail.com

FORM LETTER B 120: JACQUE BROMM

Response to Comment B 120-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 121

Dist 1

RECEIVED
FEB 01 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/1/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

WATER TABLE / TRUCK TRAFFIC

B 121-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, James Knott

Name: JAMES KNOTT

Address: 506 BRIDGE ST NC

Phone number: 530 265 6376

Email: JGKNOTT@SBCGLOBAL.NET

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 121: JAMES KNOTT

Response to Comment B 121-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 122

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

WATER TABLE AND TRUCK TRAFFIC



B 122-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, James Knott

Name: JAMES KNOTT

Address: 506 BRIDGE ST N/C

Phone number: 530 265 6376

Email: JGKNOTT@SBCGLOBAL.NET

FORM LETTER B 122: JAMES KNOTT

Response to Comment B 122-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 123

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 123-1

A company called FoxConn moved into my family city of Racine, WI. They promised the state jobs, growth, revenue, etc. They were permitted to take farms and lands that had been in families for generations. After leveling all of this property and creating a small development, they have failed to deliver on their promises. Rise Gold has a reputation for being this same kind of company and will not bring →

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Janet Acklam

Name: JANET ACKLAM
Address: 898 FREEMAN LANE
GRASS VALLEY, CA 95949
Phone number: 925.899.0694
Email: JANET.ACKLAM@GMAIL.COM

RECEIVED
FEB 07 2022
NEVADA COUNTY PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 123: JANET ACKLAM

Response to Comment B 123-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 124

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 124-1

A company called FoxConn moved into my family city of Racine, WI. They promised state job growth, revenue, etc. They were permitted to take farms and homes that had been in families for generations. After leveling all of this property and creating a small development, they have failed to deliver on their promises. Rise Gold has a reputation for doing this same kind of company and will not bring

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Janet Acklam

Name: JANET ACKLAM

Address: 898 FREEMAN LANE
GRASS VALLEY, CA 95949

Phone number: 925.899.0694

Email: JANET.ACKLAM@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 124: JANET ACKLAM

Response to Comment B 124-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 125

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 125-1

A company called FoxConn moved into my family city of Racine, WI. They promised the state jobs, growth, revenue, etc. They were permitted to take farms and homes that had been in families for generations. After leveling all of this property and creating a small development, they have failed to deliver on their promises. Rise Gold has a reputation for being this same kind of company and will not bring

over

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Janet Acklam

Name: JANET ACKLAM
Address: 898 FREEMAN LANE
GRASS VALLEY, CA 95949
Phone number: 925.899.0694
Email: JANET.ACKLAM@GMAIL.COM

RECEIVED
FEB 07 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

anything good to Grass Valley!
If Rise Gold does mark this mine,
they will destroy the beauty and
tranquility of our community with
blasting of the mine tunnels and
hauling away the waste rock.

Further, the waste water dumped
into the South Fork Wolf Creek will
continue through the section of
Wolf Creek on our property. This section
of the Creek was recently restored
by the efforts of Newmont Mining. The
dumping of this mining water will
take us back many years to the
contaminants previously seen in our
Creek.

Please do not allow this project
to move forward!!

FORM LETTER B 125: JANET ACKLAM

Response to Comment B 125-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter B 126

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 126-1

A Company called FoxConn moved into my family city of Racine, WI. They promised the state jobs, growth, revenue, etc. They were permitted to take farms and homes that had been in families for generations. After leveling all of this property and creating a small development, they have failed to deliver on their promises. Rise Gold has a reputation for being this same kind of company and will not bring

over

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Janet Acklam

Name: JANET ACKLAM
Address: 898 FREEMAN LANE
GRASS VALLEY, CA 95949
Phone number: 925.899.0694
Email: JANET.ACKLAM@GMAIL.COM

RECEIVED
FEB 10 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

anything good to Grass Valley!
If Rise Gold does mark this mine,
they will destroy the beauty and
tranquility of our community with
blasting of the mine tunnels and
hauling away the waste rock.

Further, the waste water dumped
into the South Fork Wolf Creek will
continue through the section of
Wolf Creek on our property. This section
of the creek was recently recovered
by the efforts of Newmont Mining. The
dumping of this mining water will
take us back many years to the
contaminants previously seen in our
Creek.

Please do not allow this project
to move forward!!

FORM LETTER B 126: JANET ACKLAM

Response to Comment B 126-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek.

Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume II of IX
(Chapter 2 *Continued*)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Form Letter B 127

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 127-1

A Company called FoxConn moved into my family city of Racine, WI. They promised the state jobs, growth, revenue, etc. They were permitted to take farms and homes that had been in families for generations. After leveling all of this property and creating a small development, they have failed to deliver on their promises. Rise Gold has a reputation for being this same kind of company and will not keep →

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Janet Acklam

Name: JANET ACKLAM

Address: 898 FREEMAN LANE
GRASS VALLEY, CA 95949

Phone number: 925.899.0694

Email: JANET.ACKLAM@GMAIL.COM

RECEIVED
FEB 07 2022
PLANNING

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

anything good to Grass Valley!
If Rise Gold does mark this mine,
they will destroy the beauty and
tranquility of our community with
blasting of the mine tunnels and
hauling away the waste rock.

Further, the waste water dumped
into the South Fork Wolf Creek will
continue through the section of
Wolf Creek on our property. This section
of the creek was recently recovered
by the efforts of Newmont Mining. The
dumping of this mining water will
take us back many years to the
contaminants previously seen in our
creek.

Please do not allow this project
to move forward!!

FORM LETTER B 127: JANET ACKLAM

Response to Comment B 127-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter B 128

Part 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/6/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 128-1

A Company called Fox Com moved into my family city of Racine, WI. They promised the state jobs, growth, revenue etc. They were permitted to take farms and homes that had been in families for generations. After leveling all of this property and creating a small development they have failed to deliver on their promises. Rise Gold has a reputation for being this same kind of company and will not bring any-thing good to Grass Valley!
If Rise Gold does work this mine, they →

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,
Janet Ackland 2/6/22

Name: JANET ACKLAM

Address: 898 FREEMAN LN
GRASS VALLEY, CA 95949

Phone number:
925. 899. 0694

Email:
JANET. ACKLAM @ GMAIL. COM

will destroy the beauty and tranquility of our Community with blasting of the nine tunnels and hauling away the waste rock.

Further, the waste water dumped into the South Fork Wolf Creek will Continue through the section of Wolf Creek on our property. This section of the Creek was recently recovered by the efforts of Newmont Mining. The dumping of this mining water will take us back many years to the Contaminants previously seen in our Creek.

Please do not allow this Project to move forward!!

FORM LETTER B 128: JANET ACKLAM

Response to Comment B 128-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding concerns about discharge into South Fork Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek.

Form Letter B 129

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-4-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I see no redeeming value in opening this mine.
- I see $$ in the eyes of those who think this is a good idea. Opening this mine disrespects the homeowners, family + businesses that will be affected from the noise + pollution
- Who is being paid to say there will be no environmental impact?
- The risk is too big for a few jobs.

B 129-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Janet Abbott

Address: 63 Rockwood Dr

Phone number: 408-307-4679

Email: verse_artist@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 129: JANET CLOGETT

Response to Comment B 129-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 130

Dist 2

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb. 4 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We need to protect our environment from further toxicity. There are other places to mine that are not near families! If this happens, we will move to a place where city & county officials Listen and care more about their people than money!!!

B 130-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Janet L Moore

Name: Janet L Moore

Address: 104 Berriman Loop GV CA 95949

Phone number: 530-575-2323

Email: jlynne913@gmail.com

FORM LETTER B 130: JANET MOORE

Response to Comment B 130-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 131

RECEIVED

FEB 10 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/3/2022

Dist 1

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 131-1

see attached addendum

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Janet Weaver

Address: 10818 Gunsmoke Road, GV. 95945

Phone number: 530 477-5521

Email: jm.mp31@hotmail.com

Janet Weaver

Addendum: County Board of Supervisors:

I have several concerns regarding the Rise Gold Mine.

1. **Well Water:** Although we are 3.5 miles down Greenhorn, we may also be impacted by the voluminous amount of (possible contaminated) water that will be extracted from the mine. We are still in a drought and the snow disaster we had in December, reflects that. Trees had shallow roots because of the lack of water The enormous amount of water that will be then sent down the South Folk Wolf Creek, perhaps overflowing its banks.

2. **Traffic:** As I left this morning at 8:45 a.m. to make my right onto Brunswick from Greenhorn I noted that there had to be a least 30 cars lined up at the flashing red light to enter the city or freeway. They were as far back as the exit from the mine on Brunswick. To add 100 trucks coming up from Bennett will probably put this line as far back as the "Y". Many people from outside of GV area, are probably unaware of the extra time it will take them each day to get either into our city or out of it.

3. **Toxicity:** Hard rock mining is extremely toxic. Our property was deemed an EPA Superfund in 1998 because of the tailing overflow from the 1997 storms. Because the County could not afford the clean-up, the federal agency stepped in and spent thousands of dollars to correct the toxic waste flowing down the Little Clipper Creek. Taxpayers from all over the country fund EPA. EPA continues to monitor this site and I understand it will always be deemed a Superfund site.

There are so many other reasons NOT to have this mine. Perhaps consider having it a permanent green waste space and build a cogeneration (cogen) plant, creating our own clean energy.

We are no longer a Mining Town and anything built in that area should reflect 2022 ideas and not 1849 ideas.

FORM LETTER B 131: JANET WEAVER

Response to Comment B 131-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 132

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/23/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Please Stop the insanity

B 132-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Janice Duckenball

Address: 10346 Daffodil Lane

Phone number: 530 515 1715

Email: ~~X~~

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 03 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 132: JANICE LUBENBILL

Response to Comment B 132-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 133

Dist 4

RECEIVED
MAR 0 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2/23/22

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 133-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Janice LuKenbill

Address: ~~17673 A~~ 10346 Daffodil Ln; Penn Valley CA

Phone number: 530 575 1715

Email: N/A

FORM LETTER B 133: JANICE LUBENBILL

Response to Comment B 133-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 134

Dist 3

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

FEB 07 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2-4-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I see no redeeming value in opening this mine I only see $$ in the eyes of those who think this is a good idea. Opening this mine disrespects the homeowners, families & businesses that will be effected from the noise & poluction.
- Who is being paid to say there will be no environmental impact?
- The risk is too big for a few jobs

B 134-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jane Clagett
Address: 63 Rockwood Dr, Grass Valley Ca
Phone number: 408-307-4679
Email: verse_artist@yahoo.com

FORM LETTER B 134: JANIS CLAYETT

Response to Comment B 134-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 135

HSRS

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

AIR POLUTION
HEALTH & ENVIRONMENTAL CONCERNS
USING TOO MUCH WATER, CONTAMINATING WATER
LOSS OF PROPERTY VALUE
TRAFFIC & NOISE
IT'S TOO CLOSE TO HOMES

B 135-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Jean Velikonia

Name: JEAN VELIKONIA

Address: 111 MARGRETTA CT GRASS VALLEY

Phone number: 530-446-6911

Email: bluepony888@aol.com

FORM LETTER B 135: JEAN VELIKONIA

Response to Comment B 135-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 136

February 17, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corpoeration. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Suprvisors before they vote on the matter.

I have read both sides of the argument and I must say that my biggest concern is that Rise Gold is not trustworthy. They have lied and been manipulative. They have a history of suspect business practices. The positives for our community are few, if any. The list of possible negative impacts on our community is long, including changes in the character of our foothill community, and an increase in greenhouse gases adding to the problem of climate change instead of helping to solve it. We have suffered from damage from the mining industry before and are still living with the consequences. Rise Gold's history has shown that it does not care about the environment.

B 136-1

I am a Nevada County resident and see that the Rise Gold Corporation lacks concern for our environment and the people who live here. Despite what Rise Gold says or how it reports on its manipulated polls, this community does NOT support their project. Our community leaders will be taking an enormous risk if we approve this mine. Please do the right thing and advise the supervisors to deny permission to reopen.

Sincerely,

Jeanne Palmer

Jeanne Palmer
13358 Jeabjo Way
PO Box 127
Nevada City, CA 95959

Staff cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 136: JEANNE PALMER

Response to Comment B 136-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 137

Dist 4

RECEIVED

FEB 23 2022

NEVADA COUNTY
BD OF SUPERVISORS

February 17, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofeld, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corpoeration. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project.

I have read both sides of the argument and I must say that my biggest concern is that Rise Gold is not trustworthy. They have lied and been manipulative. They have a history of suspect business practices. The positives for our community are few, if any. The list of possible negative impacts on our community is long, including changes in the character of our lovely foothill community, and an increase in greenhouse gases, adding to the problem of climate change instead of helping to solve it. We have suffered from damage from the mining industry before and are still living with the consequences. Rise Gold's history has shown that it does not care about the environment.

B 137-1

I am a Nevada County resident and see that the Rise Gold Corporation lacks concern for our environment and the people who live here. Despite what Rise Gold says or how it reports on its manipulated polls, this community does NOT support their project. Our community leaders will be taking an enormous risk if we approve this mine. Please do the right thing and vote against this horrible project. Thank you.

Sincerely,

Jeanne Palmer

Jeanne Palmer
13358 Jeabjo Way
PO Box 127
Nevada City, CA 95959
530-913-8391
Jpalmernc@gmail.com

FORM LETTER B 137: JEANNE PALMER

Response to Comment B 137-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 138

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/8/22

RECEIVED
MAR 0 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. If approved, this mine would operate 24 hours a day, 7 days a week, for up to 30 years near residential areas (undercutting property values).

B 138-1

2. The dewatering requirements while we endure a drought are reckless and a waste of this vital resource.
3. The value of gold as a store of value is volatile, antiquated and may lead to a sudden shutdown of mining operations with no accountability long term.

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: JEFFREY ADAMS

Address: 12333 MEADOW VIEW WAY, ROUGH AND READY, CA

Phone number: (530) 432-2229

Email: jeffsatoms@gmail.com

FORM LETTER B 138: JEFFERY ADAMS

Response to Comment B 138-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 139

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/29/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 139-1

I am a ~~Nevada County resident~~ frequent visitor and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Jennifer Martineau

Address: 2121 Tevis Rd 95825

Phone number:

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 139: JENNIFER MARTINEAU

Response to Comment B 139-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 140

RECEIVED

FEB 01 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/29/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Grass Valley's economy is largely tourist based. Clear air and water, two fundamental drivers of environmental quality are at risk. Why kill the golden goose?!!

B 140-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Jennifer McCarthy

Name: Jennifer McCarthy

Address: 213 Lloyd St

Phone number: Grass Valley, CA 95945

Email: jenmccarthy2013@gmail.com

FORM LETTER B 140: JENNIFER MCCARTHY

Response to Comment B 140-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 141

B

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/24/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 141-1

Grass Valley is a tourist destination -- why kill the golden goose?!! This company has a very poor record of environmental compliance, and clean air and water are fundamental to a clean region.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Jennifer McCarthy

Name: Jennifer McCarthy

Address: 213 Lloyd St
Grass Valley, CA 95945

Phone number:

Email: jennmccarthy2012@gmail.com

RECEIVED
FEB 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 141: JENNIFER MCCARTHY

Response to Comment B 141-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 142

BST 1

RECEIVED
JAN 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/22/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I want to protect our water and environment. With California and our region burning every year it seems extremely unresponsible to reopen the mine.

B 142-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Jesmine Reymond
Address: 551 N Pine St, Nevada City CA 95959
Phone number: 530 913 8547
Email: jesmine.reymond@gmail.com

FORM LETTER B 142: JESMINE REYMOND

Response to Comment B 142-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 143

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This mine seems to be an extremely unresponsible project for our waters and environment. and health of our community.

B 143-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Jesmine Reymond

Address: 551 N Pine St

Phone number: 530 913 8547

RECEIVED
JAN 31 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 143: JESMINE REYMOND

Response to Comment B 143-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 144

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-19-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 144-1 Water

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: JESPER

Address: 11761 CREEK VIEW DR.

Phone number: 408-597-2251

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 144: JESPER

Response to Comment B 144-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 145

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-4-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Mining, although a part of our history, is not part of the regenerative future we need to build for our community. There are much better ways to create jobs.

B 145-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Jesse Grimes

Name:

Address: 111 Bank St #165 Grass Valley, CA 95945

Phone number: 949 291 1898

Email: Orchard Fire@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 145: JESSE GRIMES

Response to Comment B 145-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 146

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/27/21

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I (and 80% of my friends) live & work nearby

B 146-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Jesse Wilson (CEO, Brown Banana Books)

Address: 671 Maltman Dr., Grass Valley

Phone number: 530-886-9509

Email: BrownBananaBooks@protonmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 146: JESSE WILSON

Response to Comment B 146-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 147

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/16/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 147-1 the mine will pollute air & water & increase lung disease. clouds of toxic mining dust including asbestos will drift downwind into Grass Valley. Waste water will be dumped into S. Fork Wolf Creek destroying habitats & stirring up existing residue like mercury, cyanide & lead w/ disastrous effects for downstream ecosystems. Wells will go dry & we will suffer.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Jessica Kilroy

Address: 17346 Excelsior ditch camp Rd Nevada City, CA 95959

Phone number: 530 388 6589

Email: jessicakilroy@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 22 2022
NEVADA COUNTY PLANNING DEPARTMENT

FORM LETTER B 147: JESSICA KILROY

Response to Comment B 147-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Finally, regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 148

Dist 3

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/16/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 148-1

The mine will pollute air & increase lung disease. Clouds of toxic mining dust including asbestos will drift downwind into Grass Valley. Waste water will be dumped into S. Fork Wolf Creek destroying habitats & stirring up existing residue like mercury, cyanide, & lead w/ disastrous effects for downstream ecosystems.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Jessica Kilroy

Name: Jessica Kilroy

Address: 17346 Excelsior Ditch Camp Rd. Nevada City, CA 95959

Phone number: (530) 388-6589

Email: jessicakilroy@gmail.com

FORM LETTER B 148: JESSICA KILROY

Response to Comment B 148-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 149

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2.18.21

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 149-1 California is facing drought conditions and will likely continue to. Long range forecasting on water availability seems unrealistic.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Joan Alderdice
Address: 15420 Lower Colfax Rd. Grass Valley
Phone number: (415) 939-3504
Email: joan.alderdice@gmail.com
Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 149: JOAN ALDERDICE

Response to Comment B 149-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Form Letter B 150

Dist 5

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/20/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 150-1

The mine threatens negatively our water quality of Nevada County - will undermine the health + well being of Grass Valley + Nevada City citizens.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Joan Scofield

Address: 516 Tomby St. Grass Valley CA 95945

Phone number: 831 251-0866

Email: joan@joanrosescofield.com

FORM LETTER B 150: JOAN STEDDEN

Response to Comment B 150-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 151

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 11/20/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 151-1 The mine will be detrimental to the health & well being of Grass Valley & Nevada City residents!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Joan Gradon

Address: 516 Tomby St. Grass Valley 95945

Phone number: 831 251-0861

Email: joan@joangradon.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

NEVADA COUNTY PLANNING DEPARTMENT
JAN 29 2022
RECEIVED

FORM LETTER B 151: JOAN STEDDEN

Response to Comment B 151-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 152



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2.13.22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Noise from trucks

B 152-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Joanne P. Norton

Address: 133 Castlemont Dr. G.V.

Phone number: 530.272.6549

Email: joanna6_36@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 152: JOANNE NORTON

Response to Comment B 152-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 153

Dist 3

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2.13.22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Noise - Trucks

B 153-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Joanne P. Norton

Address: 133 Castlemont Dr. G.V. CA

Phone number: 530-272-6549

Email: joanna6_3@yahoo.com

FORM LETTER B 153: JOANNE NORTON

Response to Comment B 153-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 154

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 13 Feb. '22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- There are serious risks to our health, our environment, our property values, and our peace and quiet; and
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.

B 154-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, John Burnside

Name: John Burnside

Address: 10628 Melody Road, Big Oak Valley, CA 95977-9537

Phone number: (530) 575-5007

Email: johnburnside@me.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 154: JOHN BURNSIDE

Response to Comment B 154-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 155

Dist 4

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 13 Feb. '22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- There are serious risks to our health, our environment, our property values, and our peace and quiet; and
- Removal of 1 to 3 million gallons of contaminated water per day for the next 20 years, dewatering hundreds of wells.

B 155-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, John Burnside

Name: John Burnside

Address: 10628 Melody Road, Big Oak Valley, CA 95977-9537

Phone number: (530) 575-5007

Email: johnburnside@me.com

FORM LETTER B 155: JOHN BURNSIDE

Response to Comment B 155-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 156

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/30/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I will lose my well water supply.
- Noise and toxic mining dust and pollution
- Loss of property value
- Pollutors of streams

B 156-1

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: John Mc Knight

Address: 13206 Banner Lava Cap Road Nevada City, Ca. 95959

Phone number: 860 690 6602

Email: JCJOCAROLO@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 156: JOHN MCKNIGHT

Response to Comment B 156-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Concerns related to property value are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects to streams and nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding air pollution, including toxic air contaminants, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 157

12sr3

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Please Don't Destroy our Community!
This would devastate our way of life and stomp on our freedoms! As well as it is Criminal.

B 157-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Joseph M. Bonomolo

Address: 1400 Segsworth way Apt #6

Phone number: (530) 648-8142

Email: minuteman111@protonmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 157: JOSEPH BONOMOLO

Response to Comment B 157-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 158

Dist 4

RECEIVED
Date: MARCH 9, 2022
MAR 15 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 158-1

- THE EFFECTS ON OUR WATER RESOURCES CANNOT BE PREDICTED. THERE ARE SO MANY CONNECTED MINE SHAFTS & ADITS THAT THERE IS BOUND TO BE WATER PUMPED OUT THAT IS NOT FIGURED INTO THE EFFECTS.
- BLASTING & TRUCKING NOISE WILL BE UNACCEPTABLE AND SCARE AWAY THE TOURISTS WE HAVE CULTIVATED.
- THE DRAFT EIR EFFECTS ARE UNDERESTIMATED & UNACCEPTABLE.
- RISE GOLD HAS A VERY POOR FINANCIAL REPUTATION. THEY WILL LEAVE US CLEANING UP THEIR MESS.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Judie L. Tartaglia

Name: JUDIE L. TARTAGLIA

Address: 11892 POLARIS DR., GRASS VALLEY, CA 95949

Phone number: 530-559-0322

Email: judietart@YAHOO.COM

FORM LETTER B 158: JUDIE TARTAGLIA

Response to Comment B 158-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek. Noise impacts related to the proposed project operations, including blasting and truck traffic, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 159

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: MARCH 9, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- THE EFFECTS ON OUR WATER RESOURCES CANNOT BE PREDICTED DUE TO THE MINES CRACKS & FISSURES THAT ARE INTERCONNECTED.
- MOSSMAN HAS A VERY POOR FINANCIAL REPUTATION AND A VERY BAD ENVIRONMENTAL RECORD. WE'LL BE CLEANING UP HIS MESSES FOR DECADES.
- EFFECTS ON THE ENVIRONMENT OF HUGE TAILINGS PILES IS WILDLY UNDERESTIMATED IN THE DEIS.

B 159-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Judie L Tartaglia

Name: JUDIE L. TARTAGLIA

Address: 11872 POLARIS DR., GRASS VALLEY, CA 95949

Phone number: 530-559-0322

Email: judietart@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 159: JUDIE TARTAGLIA

Response to Comment B 159-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 160

RECEIVED

FEB 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 2

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 21, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines that pollute!
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.

B 160-1

- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods. Noise affects mental health.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights – see map!
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- Nevada County revenue will be from ordinary property taxes, not from gold.
- The history and business practices of Rise Gold Corp. do not inspire trust.
- Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.
- Rise Gold CEO, Ben Mossman, has been charged with environmental violations in B.C. Canada.
- There are many questions about the financial stability of Rise Gold Inc.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Judy McVicker

Name: Judy McVicker

Address: 17485 Brewer Rd.

Phone number: 530-273-4983

Email: brumcv@yahoo.com

FORM LETTER B 160: JUDY MCVICKER

Response to Comment B 160-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 161

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan. 29 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I do not feel it is in the best interest of the town, the residents, commerce, or nature.

B 161-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: jules tertolani

Address: 548 E. Broad St., Nevada City, CA

Phone number: 415.613.7764

Email:

FORM LETTER B 161: JULES TORTOLANI

Response to Comment B 161-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 162

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/18/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 162-1

I spent 15 years as the Curator/director of an historical museum with an emphasis on hard rock mining and the Gold Rush. Have we learned nothing from our past?! We are running out of time to do the right thing for our environment. Our community deserves better! Do not be taken in by the swindlers & speculators who seek to profit from our resources & naivete.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Karen Donaldson

Name: KAREN DONALDSON

Address: 5 Rockwood Dr. GV CA 95945

Phone number: 530.798.8098

Email: kdonaldson@nccn.net

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 162: KAREN DONALDSON

Response to Comment B 162-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 163

Dist 3

RECEIVED
FEB 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/18/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 163-1

I spent 15 years as curator/director of an historical museum with an emphasis on hard rock mining and the Gold Rush. Have we learned nothing from our past?! We are running out of time to do the right thing for our environment. Our community deserves better! Do not be taken in by the promises of swindlers & speculators who seek to profit from our resources & naivete. Nothing can be gained from Rise Gold.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Karen Donaldson

Name: KAREN DONALDSON

Address: 5 Rockwood Dr. GV CA 95945

Phone number: 5307988098

Email: kdonaldson@ncen.net

FORM LETTER B 163: KAREN DONALDSON

Response to Comment B 163-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 164

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/11/21

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

all the pollution involved and degradation of my local community environment that is so so so dear to me.

B 164-1 I also care for my neighbors health who live near the mine location

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Karuna Holm
Address: 19514 Heather Dee Ct. Grass Valley
Phone number: (415) 686-4080
Email: karuna.snow@gmail.com

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 164: KARUNA HOLM

Response to Comment B 164-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 165

Dist 1 RECEIVED

FEB 18 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/11/21

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

all the pollution involved, and the degradation of my local community environment that is so so so dear to me. I also care for my neighbors health & peace who live near the mining location

B 165-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Karuna Holm

Address: 19514 Heather Dee Ct. Grass Valley

Phone number: (415) 686-4080

Email: karuna.snow@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 165: KARUNA HOLM

Response to Comment B 165-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 166

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

No one picks a mining town for a holiday weekend destination. All of us who live here for the charm, peace, natural settings, offerings. We lose twice w/ the mine We lose tourism/commerce & we lose quality of life. There is not one example of a successful re-opening of a mine on this scale in the middle of a town that Rise Gold can identify. They know that - if you've done any homework you know it too.

B 166-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Kate Dwyer

Name: KATE DWYER

Address: 345 Alexander St. NC 95959

Phone number: 530 264 7079

Email: kate@extasia.com

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 166: KATE DWYER

Response to Comment B 166-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 167

RECEIVED

FEB 25 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 16 Feb 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 167-1 No one designs a holiday weekend w/ a destination at a mining town. All at us who live here for the charm, peace, natural setting; offerings, all at the tourists whose business supports us lose w/ the mine. There is not one example at a successful re-opening at a major mine, using this technology, that has increased quality of life or home values. Rise Gold knows this, if you've done your homework you know this too.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Kate Dwyer

Name: KATE DWYER

Address: 345 Alexander St. NC 95959

Phone number: 530 264 7079

Email: kate@exhesid.com

FORM LETTER B 167: KATE DWYER

Response to Comment B 167-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 168

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/9/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I am very concerned about water quality in our watershed. This mine's wastewater would be deposited into the South Fork of Wolf Creek. It's 2022, we have learned by now that waste into our precious waterways is extremely detrimental to our ecosystem and the creatures living within it. Also the health impacts to our beloved community – airborne toxic dust drifting into nearby communities/neighborhoods, and increased risk of cancers, increased dangers due to increased truck hauling on Brunswick Rd.

B 168-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Kathleen Boyer

Name: Kathleen Boyer

Address: PO Box 381, 12333 Meadow View Wy, Rought Ready 95975

Phone number: 530. 913-3841

Email: kmbmidwife@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 168: KATHLEEN BOYER

Response to Comment B 168-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Regarding air pollution, including toxic air contaminants, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 169

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-12-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Risk to Our Health, environment, property value & peace & Quiet
Toxic waste, noise & increased traffic
contaminated water
Rise Gold has a history of violations of mining & environmental laws

B 169-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Kathleen Lombardi

Address: 911 Freeman Lane
Grass Valley, CA 95949

Phone number: 707-391-1440

Email: lombardkc@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
PLANNING DEPARTMENT

FORM LETTER B 169: KATHLEEN LOMBARDI

Response to Comment B 169-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 170

Dist 3

RECEIVED
FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-12-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Risk to our health, environment, property value & peace & quiet
Toxic waste, noise & increased traffic
contaminated water
Rise Gold has a history of violating mining & environmental law

B 170-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Kathleen Lombardi

Address: 911 Freeman Lane
Grass Valley, CA 95949

Phone number: 707-341-1440

Email: tombarkc@gmail.com

FORM LETTER B 170: KATHLEEN LOMBARDI

Response to Comment B 170-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 171

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

February 15, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastodonato and William Greeno.

Cc Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock

I the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Ross Gold Corporation. I understand that you will be reviewing he Draft Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find that Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors and businesses.

I have been to the gold mines in Elko Nevada and I have personally seen what is involved with a mining venture. It is totally disruptive to the area. To state some reasons:

- The mine will pollute our air and increase lung disease
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley
- if approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet. Even is kept "below legal noise level" it would still be heard all over the valley.
- Hard rock mining is the single largest source of toxic waste in the United States;
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Road is in the middle of hundreds of family homes and it is zoned "residential".
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of mine waste rock, 100 trips every day, down Brunswick Road poling higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years de-watering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroying habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined.
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased cancer in Nevada County. (The jobs made available to Nevada County residents would be for those of driving the waste rock trucks.)
- Nevada County currently has a surplus of unfilled job positions
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% on their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of the Grass Valley area.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground rights.
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel,. . .
- Neighbors of the mine not even open yet, have complained of sink holes on their property due to exploratory blasting, that will only get worse. As Nevada County is covered in old mine shafts that would collapse with the planned blasting.

I have personally witnessed a Gold Mining operation. I have seen the water filled with the cyanide and or arsenic, that was used to extricate the gold from the rock, flowing down to the holding ponds to be "removed"

B 171-1

1

and then have that water released into the creeks and rivers. I have seen the trucks used in a mining operation. I have witnessed the hills of rock from the mine deposited away from the mine.

I have seen the devastation caused by Gold Mines in production. The Nevada County will not longer be the destination for a peaceful, beautiful lifestyle. These are many reasons this mine should NOT be reopened.

If you have any doubt of the reasons stated, visit the Elko Nevada area's mines. Elko is not in a foothill forested area, full of residences all over the county, but you can see the impact a mine has on a desert area. Imagine what it would do to an area as Nevada County and our residences.

I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley, in Nevada County. I truly hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Ms Kathryn Gerwig
PO Box 156
Grass Valley, CA 95945
916-877-0132
kathrynlg@hotmail.com

FORM LETTER B 171: KATHRYN GERWIG

Response to Comment B 171-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 172
Dist 3

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

February 15, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock

Cc Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastodonato and William Greeno.

I the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Ross Gold Corporation. I understand that you will be reviewing he Draft Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find that Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors and businesses.

I have been to the gold mines in Elko Nevada and I have personally seen what is involved with a mining venture. It is totally disruptive to the area. To state some reasons:

- The mine will pollute our air and increase lung disease
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley
- if approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet. Even is kept "below legal noise level" it would still be heard all over the valley.
- Hard rock mining is the single largest source of toxic waste in the United States;
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Road is in the middle of hundreds of family homes and it is zoned "residential".
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of mine waste rock, 100 trips every day, down Brunswick Road poling higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years de-watering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroying habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined.
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased cancer in Nevada County. (The jobs made available to Nevada County residents would be for those of driving the waste rock trucks.)
- Nevada County currently has a surplus of unfilled job positions
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% on their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of the Grass Valley area.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground rights.
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel,. . .
- Neighbors of the mine not even open yet, have complained of sink holes on their property due to exploratory blasting, that will only get worse. As Nevada County is covered in old mine shafts that would collapse with the planned blasting.

I have personally witnessed a Gold Mining operation. I have seen the water filled with the cyanide and or arsenic, that was used to extricate the gold from the rock, flowing down to the holding ponds to be "removed"

B 172-1

and then have that water released into the creeks and rivers. I have seen the trucks used in a mining operation. I have witnessed the hills of rock from the mine deposited away from the mine.

I have seen the devastation caused by Gold Mines in production. The Nevada County will not longer be the destination for a peaceful, beautiful lifestyle. These are many reasons this mine should NOT be reopened.

If you have any doubt of the reasons stated, visit the Elko Nevada area's mines. Elko is not in a foothill forested area, full of residences all over the county, but you can see the impact a mine has on a desert area. Imagine what it would do to an area as Nevada County and our residences.

I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley, in Nevada County. I truly hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Ms Kathryn Gerwig
PO Box 156
Grass Valley, CA 95945
916-877-0132
kathrynlg@hotmail.com

FORM LETTER B 172: KATHRYN GERWIG

Response to Comment B 172-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 173

Dist 3

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/21/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Water supply in drought years
Water pollution
Dust pollution
We are still mitigating poison from past mining operations
Underground mining noise pollution

B 173-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Kathryn Kemp

Address: 10676 Bartlett Dr Grass Valley, CA 95945

Phone number: 530-272-5983

Email: jkm_kemp@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 173: KATHRYN KEMP

Response to Comment B 173-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption, drought, and water quality, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 – Drought and Climate Change, and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 174

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-1-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

* What it will do to my well-water!
* The traffic and conjestion it will create will be horrible!
* The pollution will be significant.
* I use the mine for recreation. I don't see that happening if the mine reopens.

B 174-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Kathy S. Askins

Address: 14078 Lower Colfax Rd Grass Valley, Ca 95945

Phone number: 530 477 6140

Email: KSaskins@yahoo.com

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 174: KATHY ASKINS

Response to Comment B 174-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 175

Dist 1 RECEIVED

MAR 25 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3-23-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 175-1

Rise gold has a horrid track record, still going to court for the toxic mess they left in Bristish Columbia! Aside from polluting our creek (wolfe) with their waste water, greenhouse gas pollution, 80 year lease of truck traffic clogging our roadways, ruining many more wells than is stated, causing home prices to plumet, I can't belive our community, B.O.S, would even consider this! We will get no tax revenue, only a toxic mess!!!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Kathy Doty

Name: Kathy Doty

Address: 14279 Ryans Ranch Rd GV. 95945

Phone number: 530 575-7989

Email: Kathydoty2@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

Please vote No.!!!

FORM LETTER B 175: KATHY DOTY

Response to Comment B 175-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding concerns about greenhouse gases, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 176

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date 1/18/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This is not the direction for our community to head. Our area will be severely impacted by Industrial waste products, noise, pollution, and much more. This is about corporate greed. Don't go there.

B 176-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Kathy Triolo
Address: 15479 Shannon Way, NC. 95959
Phone number: 530 264-7210
Email: Ktriolo@gmail.com
Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 176: KATHY TRIOLO

Response to Comment B 176-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 177

idst1

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan 20, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The Mine operators cannot mitigate the very serious public health hazards associated with the mine

B 177-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Keith Johnson

Name: Keith Johnson

Address: 522 Sacramento Street, Nevada City

Phone number: 530-265-0277

Email: kjohnson.uucm@gmail.com

FORM LETTER B 177: KEITH JOHNSON

Response to Comment B 177-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 178

Dist 3

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 2, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. The truck traffic will disrupt travel in the area, cause wear and tear on the roads, and have a significantly negative environmental impact.
2. I live one mile from the Brunswick site and my sources of water - spring and well - will likely be disrupted.

B 178-1

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Keith Porter
Address: 12968 Burma Rd., Grass Valley CA 95945
Phone number: 530-272-7380
Email: keith@burmaoaks.com

FORM LETTER B 178: KEITH PORTER

Response to Comment B 178-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding concerns about dewatering, please see Master Response 15. Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 179

RECEIVED
FEB 14 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 4

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 179-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Keith A. Ronningen

Name: KEITH RONNINGEN

Address: 17139 CLOVER RD. Penn Valley

Phone number: 530 913 2403

Email: karonningen62@aol.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 179: KEITH RONNINGEN

Response to Comment B 179-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 180

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/3/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 180-1

Why are we going backward instead of forward? The future of this community lies in residential growth from other areas and from tourism. Mining will not only eliminate that but also irreparably harm the lives of those of us already living here. We do not need more toxic water, and dust or heavy truck traffic or noise or toxic waste. We do not need to— can't afford to lose what little water we have to mine operations. We will lose property value and the potential for other, higher paying, clean jobs. The Canadians or chineese may get rich for awhile, but we will lose everthing and have to start over, cleaning up another mess.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Kent Rose

Address: 859 Freeman Lane, Grass Valley

Phone number: 925-787-1837

Email: kentrose@comcast.net

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 180: KENT ROSE

Response to Comment B 180-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 181

Dist 3
RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. noise
2. air pollution
3. outsiders op. mine - questions re local hiring
4. ground disturbance

B 181-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Karen J Gutman

Name: Ms. K J. Gutman

Address: 1 Jill Rd Grass Valley

Phone number: 1-707-707-6021 (mobile)

Email: arniekev49@yahoo.com

FORM LETTER B 181: KEVEL GUTMAN

Response to Comment B 181-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 182

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The noise, dust etc. We have evolved from a mining town to a residential foothills town. Also, I don't like Rise Gold moving in on our community. "Nuff said."

B 182-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Kevel Gutman

Name: Ms. Kevel Gutman

Address: 1 Jill Rd. Grass Valley 95945

Phone number: (mobile) 757-707-6021

Email: anniekev49@yahoo.com

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 182: KEVEL GUTMAN

Response to Comment B 182-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 183

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This is our water
I need it as well!

B 183-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Kim B. Miller

Address: 14060 Lake Wildwood Dr. Penn Valley CA 95946

Phone number: 530-613-1917

Email: KBMiller@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 183: KIM MILLER

Response to Comment B 183-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 184

12sr5

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Water is gold. We live on a property with a well that will be impacted.

B 184-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: LAURA Gagliasso

Address: 14035 Diamond Ct
Grass Valley 95945

Phone number:

Email: lmgagliasso@comcast.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 184: LAURA GAGLASS

Response to Comment B 184-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 185

RECEIVED
FEB 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb. 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- There is serious risk to our environment, specifically the amount of waste water to be discharged & treated, threatening wells and watershed.
- Continual blasting and transport of rock material.
- The benefits of this project seem to be one-sided, Rise Gold Corporation does not seem to have a responsible or profitable record. Why would we allow this?

B 185-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Laura Harter

Name: LAURA HARTER

Address: 15801 Shannon Way, Nevada City, CA 95959

Phone number: 530-575-6790

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 185: LAURA HARTER

Response to Comment B 185-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 186

Dist 1

RECEIVED

FEB 17 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb. 19, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- There is serious risk to our environment specifically the amount of waste water to be discharged and treated, threatens our wells + watershed.
- Continual blasting and transport of rock material.
- The benefits of this project seem one-sided. Rise Gold Corp does not have a responsible or profitable record. Why would we allow this?

B 186-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Laura Harter LAURA HARTER

Name: 15801 Shannon Way, Nevada City 95959

Address: [redacted]

Phone number: 530-575-6790

Email: laurahartter117@gmail.com

FORM LETTER B 186: LAURA HARTER

Response to Comment B 186-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 187

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-16-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pumping millions of cubic feet of ground water endangers all wells - Especially in drought situations

The mine will pollute our air and increase lung disease. Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S. Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
Tourism will be hurt, based on the potential damage noted above. If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

B 187-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Laura Montgomery

Name: Laura MONTGOMERY

Address: PO Box 1888 Nevada City, CA 95959

Phone number: 530 268-3424

Email: Lmtrail05@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 187: LAURA MONTGOMERY

Response to Comment B 187-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 188

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Unable to identify Dist

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-16-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

pumping millions of cubic feet of ground water endangers all wells Especially during drought situations.

The mine will pollute our air and increase lung disease.
Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S.
Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
Tourism will be hurt, based on the potential damage noted above.
If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

B 188-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,
Laura Montgomery

Name: Laura Montgomery

Address: Po Box 1888 Nevada City, CA 95959

Phone number: 530 268-3424

Email: Lmtrail05@gmail.com

FORM LETTER B 188: LAURA MONTGOMERY

Response to Comment B 188-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 189



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1-30-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- the impact on residential wells; the mine will be using millions of gallons of water & we are an area extremely affected by drought.
- the impact on property values because of potentially dry wells, noise, diesel exhaust from trucks hauling waste rock; increased traffic on Brunswick, an already busy road.
- the toxic waste generated by hard rock mining.

B 189-1

*Please do not vote to reopen the mine!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Leila Barber

Name: Leila Barber

Address: 230 Bridge St., Nevada City, CA 95959

Phone number: 530-210-6904

Email: leila_jo@sbcglobal.net
(underscore)

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 189: LEILA BARBER

Response to Comment B 189-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 190

RECEIVED

FEB 02 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 2

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1-30-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I am concerned about the vast quantities of water that will be used to operate the mine & the impact of this on local residential wells.
- If wells go dry, property values will severly decrease.
- Hard Rock mining generates tons of toxic waste. We need to take care of our earth, not further pollute it.
- Traffic impact on Brunswick Rd, an already very busy road.
- Noise impact & diesel exhaust from trucks hauling rock.

B 190-1

* Please vote no on reopening the mine.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Leila Barber

Name: Leila Barber

Address: 230 Bridge St., Nevada City, CA 95959

Phone number: 530-210-6904

Email: leila_jo@sbcglobal.net
(underscore)

FORM LETTER B 190: LEILA BARBER

Response to Comment B 190-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding impacts related to increased traffic, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 191

RECEIVED

FEB 02 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 2

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1-30-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- I am concerned about the vast quantities of water that will be used to operate the mine & the impact of this on local residential wells.
- If wells go dry, property values will severly decrease.
- Hard Rock mening generates tons of toxic waste. We need to take care of our earth, not further pollute it.
- Traffic impact on Brunswick Rd, an already very busy road.
- Noise impact & diesel exhaust from trucks hauling rock.

B 191-1

* Please vote no on reopening the mine.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Leila Barber

Name: Leila Barber

Address: 230 Bridge St., Nevada City, CA 95959

Phone number: 530-210-6904

Email: leila_jo@sbcglobal.net
(underscore)

FORM LETTER B 191: LEILA BARBER

Response to Comment B 191-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding impacts related to increased traffic, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 192

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3.1.22

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 192-1 please do the right thing, and don't approve it for the money! In the long run it won't be worth it!

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Lennie C. Blum

Name: Lennie Blum

Address: 113 Lidster ave. G.V. CA 95945

Phone number: 530) 412-2093 call or txt.

Email:

FORM LETTER B 192: LENNIE BLUM

Response to Comment B 192-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 193

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3.1.22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Please do the right thing, and don't approve it for the money!

B 193-1

You know deep down that it won't be worth it in the long run.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Lennie C. Blum

Name: Lennie Blum

Address: 113 Lidster Ave. G.V, CA 95945

Phone number: 530) 412.2093

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 193: LENNIE BLUM

Response to Comment B 193-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 194

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/1/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Impact to our local water supply.
Impact to climate crisis which is ~~devastating to~~ already devastated / in critical condition.
Overall pollution (water, air, ground soil, noise)
Impact to the look, sound... of the neighborhood

B 194-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Leslie Kerns

Name: Leslie Kerns
Address: 319 Bridge Way
Phone number: 530.264.7164
Email: Lconcholar@yahoo.com

RECEIVED
FEB 03 2022

FORM LETTER B 194: LESLIE KERNS

Response to Comment B 194-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 195
Dist 1

RECEIVED
MAR 25 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/21/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The potential negative health effects
- Waste water with toxins being dumped into Wolf Creek
- Pollution of our air + water
- Potential negative effects on our well.
- Likely traffic + congestion associated with the mine operation

B 195-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Linda Ewald

Name: Linda Ewald

Address: Po Box 2106, Nevada City, CA 95959

Phone number: 530-263-9570

Email: lindaewald@gmail.com

FORM LETTER B 195: LINDA EWALD

Response to Comment B 195-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 196



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/21/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The potential negative health effects
- Waste water with toxins being dumped into Wolf Creek
- Pollution of our air & water
- Likely traffic & congestion associated with the mine operation

B 196-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,
Linda Ewald

Name:
Linda Ewald

Address:
Po Box 2106, Nevada City, CA 95959

Phone number:
530-263-9570

Email:
lindaewald@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 196: LINDA EWALD

Response to Comment B 196-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 197

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/29/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Concern about what de-watering the mine will do to the water table
- Concern about increased truck traffic
- Concern that hard rock mining is the single largest source of toxic waste in the US, and we are still dealing with the impacts of toxic waste from historical gold mining

B 197-1 I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Lindsay Dunckel

Name: Lindsay Dunckel, Ph.D.

Address: 20426 Casa Loma Dr. GV 95945

Phone number: 530-277-9718

Email: lindsaydunckel@gmail.com

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER B 197: LINDSAY DUNCKEL

Response to Comment B 197-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 198

Dist 2

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/31/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 198-1

This company has already been fined in Canada for breaking environmental laws. The traffic generated by this proposal is prohibitive; with all of the building already going on in the basin, the roads are currently stressed as is, let alone with numerous big rigs. Additionally, the water treatment scenario is an unknown and many nearby residents stand to possibly lose their wells. The sound pollution will be atrocious. Although Rise Gold currently owns the land, the tax base would be better served by their selling the land to the city and employing many with the land used for a green waste reclamation site.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Lisa Haden

Name: Lisa Haden

Address: 15854 Arrowhead Place, Grass Valley, CA 95949

Phone number: (530) 320-8392

Email: lisahaden@sonic.net

FORM LETTER B 198: LISA HADEN

Response to Comment B 198-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 199

Dist 2

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/31/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 199-1

This company has already been fined in Canada for breaking environmental laws. The traffic generated by this proposal is prohibitive; with all of the building already going on in the basin, the roads are currently stressed as is, let alone with numerous big rigs. Additionally, the water treatment scenario is an unknown and many nearby residents stand to possibly lose their wells. The sound pollution will be atrocious. Although Rise Gold currently owns the land, the tax base would be better served by their selling the land to the city and employing many with the land used for a green waste reclamation site.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Lisa Haden

Name: Lisa Haden

Address: 15854 Arrowhead Place, Grass Valley, CA 95949

Phone number: (530) 320-8392

Email: lisahaden@sonic.net

FORM LETTER B 199: LISA HADEN

Response to Comment B 199-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 200

Dist 1

RECEIVED
MAR 25 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/22/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 200-1

Gold mining in California is a thing of the past. Nevada City has a history of gold mining in environmentally unsafe ways, so please do not let history repeat itself. Nevada County is a truly enchanting place that's already on the rise, & we all have to do our best to protect this very special place we call home. Main concerns for my family are: the water impacts of our well & rivers, the trucks polluting & traffic, little shared profits with the community & the negative image the corporation will have on the area I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

LM

Name: Logan McKnight

Address: 13206 Banner Lava Cap Rd. Nevada City CA 95959

Phone number: 860-480-3735

Email: logmcknight@gmail.com

FORM LETTER B 200: LOGAN MCKNIGHT

Response to Comment B 200-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to effects on wells and water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek. Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 201

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/22/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 201-1 Gold mining in this part of California is a thing of the past. Nevada County has a history of gold mining in environmentally unsafe ways, so please do not repeate this negative history. Nevada County is a truly enchanting place that we need to protect. Main concerns are: the unhealthy impact on our wells + rivers, the truck pollution + traffic little shared profits put back into the community. I don't trust the corporations, + mining is such a dirty thing is such a precious community.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Logan McKnight

Address: 13206 Banner Lava Cap Rd Nevada City CA 95959

Phone number: 860-480-3735

Email: logmcknight@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 201: LOGAN MCKNIGHT

Response to Comment B 201-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to effects on wells and water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek. Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 202

Version 5 Fact Sheet 6.0 Turner.docx
3MB

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
FEB 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Date: 2/21/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. The mine will pollute our air and increase lung disease.
2. A working mine will damage Neighborhoods with shattered peace and quiet.
3. Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
4. Waste Water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing Toxic residues like Mercury Cyanide and lead with disastrous effects for down stream ecosystem
5. The history and Business practice of Rise Gold do not inspire Trust.

B 202-1

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Lori Jung
Address: 14008 Live Oak Lane
Phone number: 530-274-1502
Email: wjungl@sbcglobal.net

FORM LETTER B 202: LORI JUNG

Response to Comment B 202-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to concerns related to effects on wells and water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 203

RECEIVED
FEB 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/25/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I DO NOT BELIEVE THAT THIS WILL BENEFIT NEVADA COUNTY. RISE GOLD CORP IS A PROFIT CORP & THAT WHAT THEY ARE FOCUSED ON & DO NOT CARE WHAT DAMAGE THEY DO THE LAND OR ENVIRONMENT.

B 203-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: LOUIE CROCE

Address: 10742 JASPER AGATE CT
NEVADA CITY, CA 95959

Phone number:

Email: FSPS 94560 @ YAHOO.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 203: LOUIE CROCE

Response to Comment B 203-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 204

RECEIVED

FEB 02 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/25/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. ENVIRONMENT
2. ENVIRONMENT
3. ENVIRONMENT
4. ENVIRONMENT
5. ENVIRONMENT
6. ENVIRONMENT
7. ENVIRONMENT!

B 204-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: LOUIE CIROLE

Address: 10742 JASPER AGATE CT, NEVADA CITY

Phone number:

Email: FSPS94560@YAHOO.COM

FORM LETTER B 204: LOUIE CROCE

Response to Comment B 204-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 205

RECEIVED

FEB 02 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/25/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. ENVIRONMENT
2. ENVIRONMENT
3. ENVIRONMENT
4. ENVIRONMENT
5. ENVIRONMENT
6. ENVIRONMENT
7. ENVIRONMENT!

B 205-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: LOUIE CIROLE

Address: 10742 JASPER AGATE CT, NEVADA CITY

Phone number:

Email: FSPS94560@YAHOO.COM

FORM LETTER B 205: LOUIE CROCE

Response to Comment B 205-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 206

HST 5

RECEIVED
JAN 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 18, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- ***The Rise Gold CEO already has numerous violations of mining and environmental laws.***
- ***Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.***
- ***Nevada County currently has a surplus of unfilled job positions.***
- ***Business that depends on tourism will be hurt.***
- ***Homeowners can lose an estimated 20% in their property values and more if the wells are dry.***
- ***A working mine will shatter the peace and quiet of many neighborhoods.***
- ***Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights.***

B 206-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Lynda Guthrie
Address: 800 Freeman Lane #309, Grass Valley
Phone number: 707-236-0220
Email: guthrie.lynda@gmail.com

FORM LETTER B 206: LYNDA GUTHRIE

Response to Comment B 206-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 207



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 18, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- ***The Rise Gold CEO already has numerous violations of mining and environmental laws.***
- ***Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.***
- ***Nevada County currently has a surplus of unfilled job positions.***
- ***Business that depends on tourism will be hurt.***
- ***Homeowners can lose an estimated 20% in their property values and more if the wells are dry.***
- ***A working mine will shatter the peace and quiet of many neighborhoods.***
- ***Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights.***

B 207-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Lynda Guthrie
Address: 800 Freeman Lane #309, Grass Valley
Phone number: 707-236-0220
Email: guthrie.lynda@gmail.com

FORM LETTER B 207: LYNDA GUTHRIE

Response to Comment B 207-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 208

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/8/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. Concern for the wellbeing and safety of the thousands of residents surrounding the mine and waste sites.
2. Water contamination or dewatering of the wells of the surrounding properties.
3. Air pollution; toxic asbestos dust, diesel exhaust.
4. Underground tremors from blasting.
5. Noise of crushers running 24/7.
6. Previous and continuing violations of mining and environmental laws by Rise Gold.
7. Bankruptcy of Rise Gold.
8. Lowering of property values.
9. The disruption of our quiet, rural way of life, the very thing that brought us to this idyllic area from the noisy, contaminated, exceptionally crowded Los Angeles megalopolis.

B 208-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

This is a bad company, out to extract money from our land at any price, regardless of the welfare of our citizens, our water, our state, our environment. Please vote NO.

Sincerely,

Lynette Smith-James

RECEIVED
FEB 11 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: Lynette Smith-James
Address: 13430 Jeabjo Way, Nevada City, CA 95959
Phone number: 530-575-2770
Email: lynettesmithjames@yahoo.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 208: LYNETTE SMITH-JAMES

Response to Comment B 208-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 209

Dist 4 RECEIVED

FEB 11 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/9/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. Concern for the wellbeing and safety of the thousands of residents surrounding the mine and waste sites.
2. Water contamination or dewatering of the wells of the surrounding properties.
3. Air pollution; toxic asbestos dust, diesel exhaust.
4. Underground tremors from blasting.
5. Noise of crushers running 24/7.
6. Previous and continuing violations of mining and environmental laws by Rise Gold.
7. Bankruptcy of Rise Gold.
8. Lowering of property values.
9. The disruption of our quiet, rural way of life, the very thing that brought us to this idyllic area from the noisy, contaminated, exceptionally crowded Los Angeles megalopolis.

B 209-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

This is a bad company, out to extract money from our land at any price, regardless of the welfare of our citizens, our water, our state, our environment. Please vote NO.

Sincerely,

Lynette Smith-James

Name: Lynette Smith-James
Address: 13430 Jeabjo Way, Nevada City, CA 95959
Phone number: 530-575-2770
Email: lynettesmithjames@yahoo.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 209: LYNETTE SMITH-JAMES

Response to Comment B 209-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Vibration associated with blasting, as well as noise impacts related to the proposed project operations, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 210

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/14/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) It will negatively impact my rights to peaceful residential living by 24/7 sound pollution.
2) Traffic under current infrastructure will be negatively impacted and unable to support the mine operations
3) Water table for well water will be negatively impacted during a mega-drought!

B 210-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: M.T. Albano

Address: 12179 Bateham Mine Rd. G.V. 95945

Phone number:

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 210: M.T. ALBANO

Response to Comment B 210-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased traffic, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding concerns related to dewatering and drought, please see Master Response 16. Regarding concerns about effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Form Letter B 211

Dist 3

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

FEB 16 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2/14/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) Air pollution many mile radius created by mining there.
2) Well water pollution increases.
3) Infrastructure can't support traffic increases on current roads.
4) Current drought makes water and wastewater impossible to supply and manage.
5) Sound pollution 24/7 blasting and crushing etc.
6) My rights to peaceful residence and laws that support it will be broken!

B 211-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Michael Albano

Name: M.T. Albano

Address: 12179 Boreham Mine Rd.
Grass Valley, 95945

Phone number:

Email:

FORM LETTER B 211: M.T. ALBANO

Response to Comment B 211-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination and effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regards to concerns about drought, please see Master Response 16. Noise impacts related to the proposed project operations, including blasting and truck traffic, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 212

Dist 1

RECEIVED

MAR 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 22, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

I do not trust them. Look at their history, which I believe you must have done yourselves. They pollute and leave a disaster. Let's find other industries to boost our economy. We've already driven out prior businesses, and we've done little to entice anyone to replace them.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 212-1

· The mine will pollute our air and increase lung disease.

· Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

· If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

· There is serious risk to our health, our environment, our property value, and our peace and quiet.

· Hard rock mining is the single largest source of toxic waste in the United States.

· Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

· A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

· Crushing of 1,500 tons of mine waste every day, all day, using massive machines

· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.

· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area

· Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells

· Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems from the past mining operations.

· Use of over 12% of Nevada County's electricity, more than all the County businesses combined

· Numerous Rise Gold violations of mining and environmental laws in Canada and here – already

· Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)

· Business life that depends on tourism will be hurt

· Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)

· A working mine will damage neighborhoods with shattered peace and quiet

· Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!

· While Rise Gold shareholders (largely Canadian) profit, the local community gets little.

· The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.

· Where will the imported workers live when housing is already so limited in our area? ?

· 85% of vendor spending will not be local

· Nevada County revenue will be only from property taxes, all other taxes will go to the state

· The history and business practices of Rise Gold do not inspire trust

· Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

· Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

· There are many questions as to the financial stability of this company.

· The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Madeleine Dowd

Name: Madeleine DOWD

Address: 14023 Live Oak Lane, Grass Valley 95945-

Phone number: 530-308-6059

Email: mandmcruising@hotmail.com

FORM LETTER B 212: MADELEINE DOWD

Response to Comment B 212-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 213

RECEIVED
MAR 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: February 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Our highways are already impacted by additional trucks and construction. Rise's history is one that we can learn from. Why invite that unethical business into our community? There are better options, as long as we make our county business friendly.

There are many reasons this mine should NOT be reopened. My personal reasons are:

· The mine will pollute our air and increase lung disease.

B 213-1

· Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

· If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

· There is serious risk to our health, our environment, our property value, and our peace and quiet.

Hard rock mining is the single largest source of toxic waste in the United States.

· Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

· A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

· Crushing of 1,500 tons of mine waste every day, all day, using massive machines

· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.

· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area

- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells

- Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems

- Use of over 12% of Nevada County's electricity, more than all the County businesses combined

- Numerous Rise Gold violations of mining and environmental laws in Canada and here – already

- Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)

- Business life that depends on tourism will be hurt

- Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)

- A working mine will damage neighborhoods with shattered peace and quiet

- Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!

- While Rise Gold shareholders (largely Canadian) profit, the local community gets little.

- The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.

- Where will the imported workers live when housing is already so limited in our area?

- 85% of vendor spending will not be local

- Nevada County revenue will be only from property taxes, all other taxes will go to the state

- The history and business practices of Rise Gold do not inspire trust

- Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

· Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

· There are many questions as to the financial stability of this company.

· The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Madeleine Dowd

Name: Madeleine Dowd

Address: 14023 Live Oak Lane, Grass Valley 95945

Phone number: 530-308-6059

Email: mandmcruising@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 213: MADELEINE DOWD

Response to Comment B 213-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 214

Dist 3

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/21/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Air pollution
- water pollution
- past pollution at mine already
- drought water supply / cannot supply water to a huge mile that will take up large amounts of water!!

B 214-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Madeleine Kemp

Address: 10676 Bartlett Drive Grass Valley CA 95945

Phone number: (530) 277-3184

Email: MadeleineKemp12@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 214: MADELEINE KEMP

Response to Comment B 214-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination, effects on nearby wells, and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

Form Letter B 215

Dist 2

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 17, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) Clouds of airborne toxic mining dust, including asbestos will drift downwind into Grass Valley.
2) Crushing of 1,500 tons of waste rock every day, all day using massive machines
3) Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area
4) Waste water will be dumped into South Fork Wolf Creek destroying habitats
5) Homeowners can lose an estimated 20% in their property values

B 215-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Marianne Roche

Name: Marianne Roche

Address: 11011 Juanita Court Grass Valley, CA 95949

Phone number: 415 246-0882

Email: Maregen 7@yahoo.com

FORM LETTER B 215: MARIANNE ROCHE

Response to Comment B 215-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns, including property values, are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 216

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/10/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 216-1

I feel that Rise Gold has only their own interest in mind in regards to opening the mine. Based on the past history of Mr. Mossman & Rise, I feel the risk to the city and tax paying citizens is too great. Not to mention the enviornmental impact that will occur to Wolf Creek and the surrounding environ. This area is a destination for visitors and residents alike because of its pristine beauty and bucolic lifestyle. Don't let the profit of a few destroy that for future generations. Please Vote NO.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Mark Gierok

Name: MARK GIEROK

Address: 118 CONAWAY AVE GV CA 95945

Phone number: 561 719 2406

Email: gierok3@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 216: MARK GIEROK

Response to Comment B 216-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 217

Dist 3

RECEIVED
FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/10/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 217-1 I feel that Rise Gold has only their own interest in mind in regards to opening the mine. Based on the past history of Mr. Mossman & Rise Gold, I feel the risk to the city and tax paying citizens of Grass Valley is too great. Not to mention the enviornmental impact that will occur to Wolf Creek and the surrounding environ. This area is a destination for visitors and residents alike because of its pristine beauty and bucolic lifestyle. Don't let the profit of a few destroy that for future generations. Please vote No.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Mark E Gierok

Name: MARK GIEROK
Address: 118 CONAWAY AVE GV CA 95945
Phone number: 561 719 2406
Email: gierok3@yahoo.com

FORM LETTER B 217: MARK GIEROK

Response to Comment B 217-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 218

RECEIVED

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2/10/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- WITH CALIFORNIA IN A STATE OF DROUGHT & WATER RESOURCES LIMITED, WHERE WILL WATER ~~FROM~~ NEEDED FOR THE MINE COME FROM WITHOUT IMPACTING THE EXISTING ENVIRONMENT & RESIDENTS OF OUR COMMUNITY?
- THE C.E.O. OF RISE GOLD HAS BEEN CHARGED WITH ENVIRONMENTAL VIOLATIONS IN CANADA. WHAT'S TO STOP HIM FROM DOING THE SAME HERE?
- OUR COMMUNITY IS NO LONGER A GOLD MINING COMMUNITY LOCAL RESIDENTS AREN'T ~~TRAD~~ EXPERIENCED IN MINING JOBS & THE MINE WILL DISRUPT IT WITH NOISE, TRAFFIC, & TOXIC WASTE.

B 218-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

- PROFITS WILL GO OUTSIDE GRASS VALLEY WHILE DISRUPTION & DESTRUCTION WILL REMAIN IN GRASS VALLEY.

Sincerely, Mark Mj

Name: MARK REILLY

Address: 118 CONAWAY AVENUE, GRASS VALLEY, CA 95945

Phone number: 415-309-0107

Email: MARK@MARKREILLYARCHITECTURE.COM

FORM LETTER B 218: MARK REILLY

Response to Comment B 218-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

Form Letter B 219

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/10/22

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- WATER IS A LIMITED RESOURCE IN DROUGHT RIDDEN CALIFORNIA. RISE WILL BE TAKING WATER AWAY FROM OUR EXISTING RESIDENTS & NATURAL LANDSCAPE IN ORDER TO MINE & PROFIT FROM THEIR GOLD.
- THE C.E.O OF RISE GOLD WAS CHARGED WITH ENVIRONMENTAL VIOLATIONS IN CANADA. WHAT'S TO STOP HIM FROM DOING IT HERE?
- OUR RESIDENTS & COMMUNITY HAVE MOVED ON FROM BEING A GOLD RUSH TOWN. SKILLED WORKERS WILL HAVE TO COME FROM OUTSIDE THE COMMUNITY. THE MINE WILL CAUSE TRAFFIC, NOISE, & TOXIC POLLUTION.

B 219-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed. PROFITS WILL GO TO INVESTORS NOT GRASS VALLEY.

Sincerely,

Mark Reilly

Name: MARK REILLY

Address: 118 CONDWAY AVENUE, GRASS VALLEY, CA 95945

Phone number: 415-309-0107

Email: MARK@MARKREILLYARCHITECTURE.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 219: MARK REILLY

Response to Comment B 219-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

Form Letter B 220

Dist 1
RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/18/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- BAD TRACK RECORD OF RISE GOLD
- NEGATIVE EFFECTS OUTWEIGH THE JOBS TO BE GAINED. WE CAN GROW JOBS IN WAYS THAT DON'T DAMAGE OUR COMMUNITY

B 220-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: MARK TRIOLO

Address: 15472 SHANNON WY, NC CA

Phone number: 530 - 264-7210

Email: MARKTRIOLO@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 220: MARK TRIOLO

Response to Comment B 220-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 221

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/26/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- LOSS OF GROUNDWATER DURING A HISTORIC DROUGHT
- DEGRADATION OF LOCAL ENVIRONMENT
- POTENTIAL CONTAMINATION WHICH ALWAYS HAPPENS AND IS NEVER REMEDIATED.
- LACK OF LOCAL INTEREST & CONTROL IN CORPORATE GOVERNANCE.

B 221-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, MBA, CPA

Name: MARK WARNER

Address: 11124 VIA VISTA, 95959

Phone number: 530-478-9347

Email: MPWARNER108@GMAIL.COM

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 221: MARK WARNER

Response to Comment B 221-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding groundwater and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Form Letter B 222

DIST 1

RECEIVED

JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/23/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- AIR POLLUTION
- TOO MANY TRUCKS
- WASTE WATER ISSUES
- TOO MANY HEALTH ISSUES,
- DON'T THINK THE WORLD NEEDS MORE GOLD.

B 222-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Marlee Chamberlin

Name: MARLEE CHAMBERLIN

Address: 13519 TRANQUILITY LN. NC 95959

Phone number: 530-272-4804

Email: MCHAMBERLN@AOL.COM

FORM LETTER B 222: MARLEE CHAMBERLIN

Response to Comment B 222-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 223

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/23/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- AIR POLLUTION
- TOO MANY TRUCKS, ETC
- WASTE WATER ISSUES
- TOO MANY HEALTH ISSUES FOR US.
- DON'T THINK THE WORLD NEEDS MORE GOLD.

B 223-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Marlee Chamberlin

Name: MARLEE CHAMBERLIN

Address: 13579 TRANQUILITY LN. NC 95959

Phone number: 530-272-4804

Email: MCHAMBERLN@AOL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 223: MARLEE CHAMBERLIN

Response to Comment B 223-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 224

Dist 3

RECEIVED
FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-12-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 224-1

Serious risk to our health, environment & Property values
concerns about toxic waste
water contamination
Rise Gold has a history of violating mining & environmental laws

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Marie Lombardi
Address: 911 Freeman Lane
Grass Valley CA 95949
Phone number: 707-478-3686
Email: marylombardi@gmail.com

FORM LETTER B 224: MARTIN LOMBARDI

Response to Comment B 224-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns, including property values, are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 225

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-12-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Serious risk to our health, environment & property value.
- Concerns about toxic waste
- water contamination
- Rise Gold has a history of violating mining & environmental law

B 225-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Martin Lombardi

Address: 911 Truman Lane
Grass Valley, CA 95949

Phone number: 707-478-3646

Email: martylombardi@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 225: MARTIN LOMBARDI

Response to Comment B 225-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns, including property values, are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 226

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: JAN 26 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 226-1

...Air pollution. I recently read a presentation by Pam Heard, a respitory therapist, given on December 16, 2021. It was a detailed listing of toxic air pollutants that would be released into the Nevada County air with operation of the proposed mine. They included diesel exhaust, radon, silica and asbestos. I moved to Nevada County with my daughter, son-in-law and grandchildren, looking forward to all the assets of a healthy, less urban environment. The Rise Gold mine would certainly dash our hopes for a beautiful safe environment.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Mary Pickett

Name:

Address: 305 West Main St., apt 205, Grass Valley, CA 95945

Phone number: 575-779-2737

Email: marypickett2@gmail.com

FORM LETTER B 226: MARY PICKETT

Response to Comment B 226-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 227

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 227-1

air pollution - I recently read a presentation by Pam Heard, a respitory therapist, given on Dec. 17, 2021. It was a detailed listing of toxic air pollutants that would be released into Nevada county with operation of the proposed mine. They included diesel exhaust, radon, silica and asbestos. I moved to Nevada county in 2019 looking forward to all the assets of a healthy, less urban environment. The Rise Gold would certainly dash our hopes.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Mary J. Pickett

Name:

Address: 305 West Main St, Grass Valley, CA 95945

Phone number: 575-779-2737

Email: marypickett2@gmail.com

FORM LETTER B 227: MARY PICKETT

Response to Comment B 227-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 228

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

...Air pollution. I recently read a presentation by Pam Heard, a respitory therapist, given on December 16, 2021. It was a detailed listing of toxic air pollutants that would be released into the Nevada County air with operation of the proposed mine. They included diesel exhaust, radon, silica and asbestos. I moved to Nevada County with my daughter, son-in-law and grandchildren, looking forward to all the assets of a healthy, less urban environment. The Rise Gold mine would certainly dash our hopes for a beautiful safe environment.

B 228-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,
Mary L. Pickett

Name:

Address: 305 West Main St., Apt. 205, Grass Valley, CA 95945

Phone number: 575-779-2737

Email: marypickett2@gmail.com

FORM LETTER B 228: MARY PICKETT

Response to Comment B 228-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 229

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/3/22

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The negative impact on our local environment and community out weigh$ any benefit to the mining

B 229-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Melissa Shepard

Address: 310 S. Auburn St # 8, GV, CA 95945

Phone number: 530-575-1196

Email:

FORM LETTER B 229: MELISSA SHEPARD

Response to Comment B 229-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 230

RECEIVED
FEB 03 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/25/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 230-1

> this brings no benefit to our Grass Valley.
> In fact, the toxic waste, diesel exhaust, respiratory impact & blow to peace & quiet are reason to stop the mine.
> The mining dust, Tunneling / blasting noise & danger & pollution to our creeks & waterways are a threat to lives and livelihood. Do not allow this mine.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Meredith Manning

Name: MEREDITH MANNING

Address: 10717 BUTTE VIEW DR. GRASS VALLEY, CA 95945

Phone number: (415) 902-9859

Email: mermanning@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 230: MEREDITH MANNING

Response to Comment B 230-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 231

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb 13, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 231-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Mert Austin
Mert Austin
Address: 132 Sebastopol Ave Grass Valley California 95945

Phone number: [redacted]

Email: [redacted]

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 231: MERT AUSTIN

Response to Comment B 231-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 232

Dist 3

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Feb 13, 2020

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Noise from Trucks

B 232-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Albert Austin

Name: Albert Austin

Address: 132 Fichter Ave

Phone number: ———

Email: ———

FORM LETTER B 232: MERT AUSTIN

Response to Comment B 232-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 233

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/1/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Hitler was a major reason Volkswagen got off the ground.
If the Germans looked at revitalizing things over there, they might want to focus on what works but not sentimentalize what hasn't. In other words, just because something is historic is not a reason for it to exist today.

B 233-1 Mining causes environmental damage. Right now, there's so much gold above ground they store giant bars of it in vaults. We don't need to "generate wealth" by pulling more gold out of the ground at the cost of environmental damage, proven risk to groundwater, ~~and~~ noise, and other palpable ills. Lets focus on creating wealth in a way that helps people

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Micah Pierce

Address: 106 Prospect St. Nevada City

Phone number: (916) 708 5726

Email: piercemicah@hotmail.com

RECEIVED
FEB 22 2022

~~Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington~~

FORM LETTER B 233: MICAH PIERCE

Response to Comment B 233-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 234

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-16-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 234-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Michael L Baker

Name: Michael L. Baker

Address:

Phone number: 530 557-9924

Email: jeanetteleroy2@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 234: MICHAEL BAKER

Response to Comment B 234-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 235

Unable to identify Dist

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-16-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 235-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Michael L Baker

Name: Michael L. Baker

Address:

Phone number: 530 557-9924

Email: jeanettelevay2@gmail.com

FORM LETTER B 235: MICHAEL BAKER

Response to Comment B 235-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 236

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/30/22

RECEIVED
FEB 02 2022
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

In my opinion, the negative impacts this mine would bring to our Community far outweighs the economic benefit that may be realized :

Sincerely, Michael Barber

B 236-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Michael Barber

Name: MICHAEL BARBER
Address: 230 BRIDGE STREET NEVADA CITY, CA 95959
Phone number: (530) 210-9506
Email: inundated@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 236: MICHAEL BARBER

Response to Comment B 236-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 237

Dist 1

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/30/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

In my opinion, the negative impacts this mine would bring to our community far outweighs the "potential" economic benefit that may be realized.

B 237-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Michael Barber

Name: MICHAEL BARBER

Address: 230 BRIDGE STREET NEVADA CITY 95959

Phone number: (530) 210-9506

Email: invndated@sbcglobal.net

FORM LETTER B 237: MICHAEL BARBER

Response to Comment B 237-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 238

Dist 1

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/30/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

In my opinion, the negative impacts this mine would bring to our community far outweighs the "potential" economic benefit that may be realized.

B 238-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Michael Barber

Name: MICHAEL BARBER

Address: 230 BRIDGE STREET NEVADA CITY 95959

Phone number: (530) 210-9506

Email: invndated@sbcglobal.net

FORM LETTER B 238: MICHAEL BARBER

Response to Comment B 238-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 239

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

January 17, 2022



Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, Mike Stolla, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 239-1

- Mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods.
- Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights -- see map!
- While Rise Gold shareholders profit, the local community gets little revenue.
- The relatively few theoretical jobs gained will not offset the harm done.
- Where will the imported workers live when housing is so limited in our area?
- An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).
- Nevada County revenue will be from ordinary property taxes, not from gold.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Michael P. Stolla

267 Hughes Rd

Grass Valley, CA 95945-5643

530-273-4681

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 239: MIKE STOLLA

Response to Comment B 239-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 240

RECEIVED

JAN 20 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

January 17, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, Mike Stolla, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 240-1

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts of diesel exhaust will be produced from continuous operation, including the trucking in of explosives.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential).
- Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map).
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems.
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
- Nevada County currently has a surplus of unfilled job positions.
- Business that depends on tourism will be hurt.
- Homeowners can lose an estimated 20% in their property values and more if the wells are dry.
- A working mine will shatter the peace and quiet of many neighborhoods.

• Underground blasting is planned for 7 days a week and will be felt by those living above the
2,585 acres of mine underground mineral rights -- see map!
• While Rise Gold shareholders profit, the local community gets little revenue.
• The relatively few theoretical jobs gained will not offset the harm done.
• Where will the imported workers live when housing is so limited in our area?
• An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...).

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,



Mike Stolla

267 Hughes Road

Grass Valley, CA 95945-5643

530-273-4681

FORM LETTER B 240: MIKE STOLLA

Response to Comment B 240-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 241

RECEIVED

FEB 10 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- THEIR HISTORY AS A CORPORATION MAKES ME VERY APPREHENSIVE.
- HEAVY TRUCK TRAFFIC MAKES ME UNCOMFORTABLE AND THE HARDSHIP TO OUR ROADWAYS.
- OUR UNDERGROUND WATER AND SURFACE WATERWAYS ARE SUBJECT TO WHO KNOWS - WHY GAMBLE!!

B 241-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: MIKE WEAVER

Address: 10818 GLENSMOKE

Phone number: 530 477-5521

Email: UM.MP31@HOTMAIL.COM

FORM LETTER B 241: MIKE WEAVER

Response to Comment B 241-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 242

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/20/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

B 242-1

I hope you will prevent the mine from reopening because the earth needs our protection. We have assaulted it for many years. Let's defend and protect. I love Grass Valley—do yours.

Thank you Mildred Seidman
20210 Village 20
Camarillo, Ca. 93012

FORM LETTER B 242: MILDRED SEEDMAN

Response to Comment B 242-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 243

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/4/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

negative effects water table
brings too much traffic - big hauling trucks
pollution

B 243-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Mindy Oberne

Name:

Address: Ms. Mindy E. Oberne
13169 Twin Star Ln
Grass Valley, CA 95949-8751

Phone number: 273-3033

Email: moberne117@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 243: MINDY OBERNE

Response to Comment B 243-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 244

RECEIVED

FEB 10 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/4/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

This mine would be detrimental to:
water table & private wells it feeds
traffic – big trucks driving continuously
pollution

B 244-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Mindy Oberne

Name: Mindy Oberne

Address: 13169 Twin Star Ln., GV 95949

Phone number: 273-3033

Email: moberne117@gmail.com

FORM LETTER B 244: MINDY OBERNE

Response to Comment B 244-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 245

RECEIVED
MAR 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 22, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

I do not trust them. Look at their history, which I believe you must have done yourselves. They pollute and leave a disaster. Let's find other industries to boost our economy. We've already driven out prior businesses, and we've done little to entice anyone to replace them.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 245-1

· The mine will pollute our air and increase lung disease.

· Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

· If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

· There is serious risk to our health, our environment, our property value, and our peace and quiet.

· Hard rock mining is the single largest source of toxic waste in the United States.

· Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

· A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

· Crushing of 1,500 tons of mine waste every day, all day, using massive machines

· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.

· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area

· Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells

· Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems

· Use of over 12% of Nevada County's electricity, more than all the County businesses combined

· Numerous Rise Gold violations of mining and environmental laws in Canada and here – already

· Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)

· Business life that depends on tourism will be hurt

· Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)

· A working mine will damage neighborhoods with shattered peace and quiet

· Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!

· While Rise Gold shareholders (largely Canadian) profit, the local community gets little.

· The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.

· Where will the imported workers live when housing is already so limited in our area?

· 85% of vendor spending will not be local

· Nevada County revenue will be only from property taxes, all other taxes will go to the state

· The history and business practices of Rise Gold do not inspire trust

· Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

· Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

· There are many questions as to the financial stability of this company.

· The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: MUNSON DOWD

Address: 14023 LIVE OAK LN., G.V. 95945

Phone number: (530) 305-1096

Email: mikedowd36@gmail.com

FORM LETTER B 245: MUNSON DOWD

Response to Comment B 245-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 246

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: February 22, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Can we truly trust them? No. Look at their history.

There are many reasons this mine should NOT be reopened. My personal reasons are:

· The mine will pollute our air and increase lung disease.

· Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

B 246-1 · If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

· There is serious risk to our health, our environment, our property value, and our peace and quiet.

· Hard rock mining is the single largest source of toxic waste in the United States.

· Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

· A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

· Crushing of 1,500 tons of mine waste every day, all day, using massive machines

· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.

· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area

· Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells

RECEIVED
MAR 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

· Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems

· Use of over 12% of Nevada County's electricity, more than all the County businesses combined

· Numerous Rise Gold violations of mining and environmental laws in Canada and here – already

· Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)

· Business life that depends on tourism will be hurt

· Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)

· A working mine will damage neighborhoods with shattered peace and quiet

· Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!

· While Rise Gold shareholders (largely Canadian) profit, the local community gets little.

· The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.

· Where will the imported workers live when housing is already so limited in our area?

· 85% of vendor spending will not be local

· Nevada County revenue will be only from property taxes, all other taxes will go to the state

· The history and business practices of Rise Gold do not inspire trust

· Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

· Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

· There are many questions as to the financial stability of this company.

· The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: MUNSON DOWD

Address: 14023 LIVE OAK LN., G.V., 95945

Phone number: 530-305-1096

Email: mikedowd36@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 246: MUNSON DOWD

Response to Comment B 246-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 247

Dist 3

RECEIVED

JAN 24 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

January 20, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

I am a tax-paying resident of Nevada County. I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and local businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Negative Impact on local water supply
- Negative Impact on local air quality
- Negative impact on my property value in Grass Valley
- Negative impact on local roads from increased truck traffic
- Negative impact on quality of life in Grass Valley
- Not a good use of County or public resources

B 247-1

I believe that Rise Gold Corporation lacks the resources and will to mitigate the impact of their mine project on the environment and the people of Grass Valley. I hope you will join me and thousands of other local residents who are opposed to the Rise Gold Mine proposal.

Sincerely,

Nancy Jacobsen

Nancy Jacobsen

131 Highlands Ct.

Grass Valley, CA 95945

Nanjac2010@gmail.com

FORM LETTER B 247: NANCY JACOBSEN

Response to Comment B 247-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 248

January 20, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

I am a tax-paying resident of Nevada County. I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and local businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 248-1

- Negative Impact on local water supply
- Negative Impact on local air quality
- Negative impact on my property value in Grass Valley
- Negative impact on local roads from increased truck traffic
- Negative impact on quality of life in Grass Valley
- Not a good use of County or public resources

I believe that Rise Gold Corporation lacks the resources and will to mitigate the impact of their mine project on the environment and the people of Grass Valley. I hope you will join me and thousands of other local residents who are opposed to the Rise Gold Mine proposal.

Sincerely,

Nancy Jacobsen

Nancy Jacobsen
131 Highlands Ct.
Grass Valley, CA 95945
Nanjac2010@gmail.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 2 9 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 248: NANCY JACOBSEN

Response to Comment B 248-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 249

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/22/22

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Please don't pollute our rivers!

B 249-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Nancy L. Miller

Name: Nancy Miller

Address: 14060 Lake Wildwood Dr Penn Valley Ca

Phone number: 530 401-6528

Email: millerman51@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 249: NANCY MILLER

Response to Comment B 249-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 250

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/30/22

Bst 1

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- A working mine will shatter the peace and quiet of many neighborhoods.
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- Contamination to well water and disastrous effects for ecosystems.

B 250-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Natalie Weaver

Name: Natalie Weaver

Address: 14143 Raccoon Mountain Road Grass Valley CA 95945

Phone number: (562)881-5458

Email: natalieweaver38@yahoo.com.

FORM LETTER B 250: NATALIE WEAVER

Response to Comment B 250-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to effects on wells and water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 251

Ark3

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1-22-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. destroying water wolf creek eventually flows into Sac. river into ocean.
2. Home and Property Value will plumet with all the traffic, noise pollution.
3. This is a Canadian Co. they have no interest in protecting our environment.
4. Nevada County is a beautiful natural resource we should do everything to keep it that way for future generations

B 251-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Natina Pistone

Name: Natina Pistone

Address: 13965 La Barr Meadows Rd.
GV CA 95949

Phone number: 530-277-2587

Email: natinamaria@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 251: NATINA PISTONE

Response to Comment B 251-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 252

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/2/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:



B 252-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: NICOLE FLOREZ

Address: 13520 GARDEN VIEW LN, GRASS VALLEY, CA 95945

Phone number: 415-254-2991

Email: florezNicole@gmail.com

FORM LETTER B 252: NICOLE FLOREZ

Response to Comment B 252-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 253

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS
Dist 1

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/4/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Pollution (Air, water, Land)
- Traffic
- Future Generations! I have a young daughter and want to leave her with a cleaner and healthier place to live

B 253-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Nicole Florez

Address: 13520 Garden View Ln, Grass Valley, CA 95945

Phone number: 415-254-2991

Email: florez.nicole@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 253: NICOLE FLOREZ

Response to Comment B 253-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 254

Dist 4

RECEIVED
FEB 11 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/06/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 254-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Nicolette Ronningen

Address: 17139 Clover Road

Phone number: (530) 913-6492

Email: ncronningen@gmail.com

FORM LETTER B 254: NICOLETTE RONNINGEN

Response to Comment B 254-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 255

Dist 3

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-20-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

SEE ENCLOSED

B 255-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

N. N. Ely

Name: NORMAN ELY

Address: 10747 BARTLETT DR

Phone number: GRASS VALLEY CA 95945

Email: NORM@NORMELY.COM

The Truth about the Rise Gold Mine

The Nevada County Board of Supervisors can vote to stop reopening the Idaho–Maryland Gold Mine by Rise Gold Corp. a Canadian Corp. also incorporated in Nevada.

Approval of Rise Gold Corporation's proposal will result in:

- **A large, heavy-industry factory** on 119 acres on Brunswick Rd. in the middle of hundreds of homes (zoned residential)
- **Crushing and moving 1,500 tons of mine waste every day, all day,** using massive machines
- **Hauling trucks carrying 1,000 tons of waste rock --over 100 round trips every day** -- down Brunswick Rd. to a 56-acre location (Centennial toxic dump) less than ½ mile from downtown Grass Valley, piling it higher than a 6-story building
- **Trucks and heavy machinery will produce diesel exhaust from continuous operation**
- **Clouds of mining dust including asbestos** can move over Grass Valley from digging and dumping 1,500 tons of contaminated landfill a day
- **Blasting, earth-shaking explosions** 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (including the Hospital) that can be felt inside homes
- **Over 3.5 million gallons per day to start and then 1.2 million gallons per day of waste mine water** pumped into Wolf Creek then to Bear River for the next "80 years"
- **12% of Nevada County's electricity will be taken by the Mine, more than all the County businesses combined**

What impacts are predicted if the Mine is approved?

Air pollution will worsen respiratory problems in Grass Valley **and probably increase the death rate** in Western Nevada County (expert conclusion), especially among the most vulnerable such as the elderly (over 7 hospital & senior care facilities are near the Centennial dump site). (https://www.minewatchnc.org/post/dr-newsom-on-health-risks-of-mine)

The South Fork of Wolf Creek will likely have stirred up mercury, toxic chemical residues (like cyanide & lead), and serious erosion.

Real-estate value in the vicinity will drop more than 20% (Realtors' estimate in the Union).

Loss or damage to hundreds of homeowners' wells likely from mine dewatering.

Few local jobs and little tax revenue. See Martin Webb at Minewatchnc.org and *Rise Gold Project Description* p.26 (mynevadacounty.com)

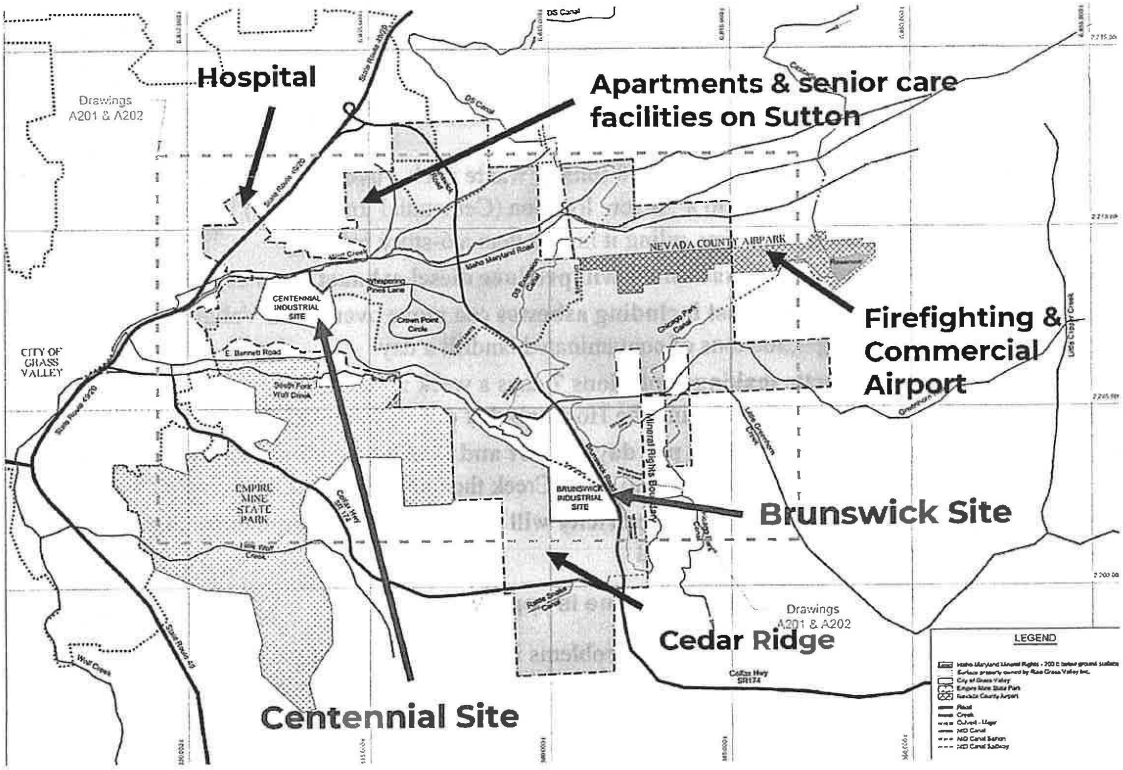
Inadequate regulation because there are not enough government personnel. Based on history, the fixes for damages will not be enforced (https://www.minewatchnc.org/post/no-state-monitor-for-mine). Legal charges against Rise Mine Corp. in Canada for failure to clean up their toxic sites are pending in court.

The Truth about the Rise Gold Mine

Dozens of residents contributed to this including the ***Elders Action Network.***

Over 3000 citizens have filled in the petition at www.MineWatchnc.org

Rise Mine plans map: (Brunswick Site=115 acre industrial center; Centenial=toxic waste dump)



* Grey area is where they can tunnel and blast (mining rights)

For the evidence:

Mine Watch Nevada County website https://www.minewatchnc.org/ by Community Environmental Advocates Foundation

MinewatchNC Mine opposition reasons https://www.minewatchnc.org/why-stop-the-idaho-maryland-mine

Martin Webb's talk on energy return-on-investment https://www.minewatchnc.org/post/energy-roi-we-can-do-better-martin-webb

Draft Environment Impact Report https://www.mynevadacounty.com/3436/Idaho-Maryland-Mine-Draft-EIR

Nevada County document website https://www.mynevadacounty.com/2882/Application-Documents---Rise-Grass-Valley

Centennial Site Cleanup Remedial Action Plan - Department of Toxic Substances Control (DTSC) https://www.envirostor.dtsc.ca.gov/public/community_involvement/1195523917/5279.04%20Draft%20Final%20RAP%2C%20Centennial%20M-1%20Property_1_25_2021.pdf

FORM LETTER B 255: NORMAN ELY

Response to Comment B 255-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the Norman DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 256

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date 02-06-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 256-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Olivia Ronningen

Name: Olivia Ronningen

Address: 17139 Clover Road, Penn Valley, CA, 95946

Phone number: (530)913-3053

Email: livronningen98@gmail.com

RECEIVED
FEB 11 2022
NEVADA COUNTY
PLANNING DEPARTMENT

do the right thing.

FORM LETTER B 256: OLIVIA RONNINGEN

Response to Comment B 256-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 257

Dist 2

RECEIVED
MAR 2 4 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/23/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 257-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Pamela Kisor

Name: Pam Kisor

Address: 17579 Lake Shore North

Phone number: 6266221615

Email: Pam Kisor@Gmail.com

FORM LETTER B 257: PAM KISOR

Response to Comment B 257-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 258

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/5/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- environmental degredation
- the ugliness of mining including waste rock, big Trucks Thundering along destroying roads and the peace + quiet and putting Tourism off.
- Threats to our health from Toxic mining dust
- waste water affecting Wolf Creek ecosystems

B 258-1

and if That weren't enough it's been documented That Rise Gold CEO is not to be Trusted. He promises lots but his record shows numerous violations of laws, both environmental and mining. The company is suspect.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Pamela Jung

Name: PAmela JUNG

Address: 800 Freeman #205
Grass Valley, CA 95949

Phone number: 530 273 0749

Email: pfjung65@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 258: PAMELA JUNG

Response to Comment B 258-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 259

RECEIVED
FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/5/22

Dist 3

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- It is a Tourism Killer (people + businesses)
- a severe health Threat (diesel exhaust, mining dust that's Toxic, noise pollution That can negatively affect mental health – the list goes on.
- water issues of great magnitude (millions of gallons of contaminated water removed Every day – waste water damaging creek ecosystems)
- will sink holes appear? – will some buildings be damaged by massive machines, heavy trucks night + day, explosives? And This for estimated decades.
- with The history Rise Gold Corp has painted, how can They be Trusted? Violations of environmental Laws – not being a profitable business. What's good about Rise Gold?

B 259-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Pamela Jung

Name: PAMELA JUNG

Address: 800 Freeman Lane #205
Grass Valley, CA 95949

Phone number: 530 273 0749

Email: PFJUNE65@gmail.com

FORM LETTER B 259: PAMELA JUNG

Response to Comment B 259-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns.

Form Letter B 260

Dist 4

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

FEB 04 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: Jan 30, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
SINCE THE CLOSING OF THE LAST MINE MANY YEARS AGO, THE ENVIRONMENTAL IMPACT OF MINING HAS BEEN CLEARLY ESTABLISHED. MY CONCERNS ARE 1) AIRBORNE TOXINS FROM WASTE ROCK & CONTAMINATED WATER 2) NOISE AND AIR POLLUTION FROM TRUCKS COMING & GOING ALL DAY 3) IMPACT PROPERTY SALES THROUGHOUT THE AREA.

B 260-1

AND FOR WHAT? 200 JOBS? There is NO GUARANTEE THAT THEY WOULD BE WELL PAYING OR GO TO LOCAL RESIDENTS. WHEN THE CANADIAN CO. WAS GOING TO REOPEN THEY PLANNED ON BRINGING CANADIAN RESIDENTS FOR THE JOBS. PLEASE VOTE AGAINST THIS PROPOSAL.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Patricia Gilling

Name: Patricia Gilling

Address: 18550 WILDFLOWER DR
PENN VALLEY CA 95946

Phone number: (530) 432-8159

Email: gillingspat@aol.com

FORM LETTER B 260: PATRICIA GILLINGS

Response to Comment B 260-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding water contamination, please see Chapter 4.8 of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek. Noise impacts related to the proposed project operations, including truck traffic, is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 261

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/23/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Toxic waste disbursements
Air pollution
Noise pollution
Risk to well water
Deterioration to quality of life

B 261-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Paul Berger

Name: Paul Berger

Address: 402 old Downieville Hwy, Nevada City

Phone number: 530 863-3000

Email: paulsberger@outlook.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 261: PAUL BERGER

Response to Comment B 261-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 262

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 16 Feb 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 262-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Pauline Marie

Name: Pauline Marie

Address: PO Box 73

Phone number: 530 273 0492

Email: pmarie002@att.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 262: PAULINE MARIE

Response to Comment B 262-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 263

Dist 2

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 17 Feb 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 263-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,
Pauline Marie

Name: Pauline Marie

Address: PO Box 73

Phone number: 530 273 0492

Email: PMarie002@att.net

FORM LETTER B 263: PAULINE MARIE

Response to Comment B 263-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 264

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 264-1 there are currently 3 new large housing developments being constructed in Grass Valley of over 300 new homes adding close to twice that many new cars, adding to the already difficult traffic situation in town. If this mine project expects to bring 300 new jobs for people from out of town then that will bring in hundreds of more vehicles. This doesn't account for the drastic increase in trucking the waste rock through the basin. And also this company is not TRUSTWORTHY

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Peter Alsing

Address: 10860 Dolores Dr. Grass Valley Ca.

Phone number: 707-695 9910

Email: pjalsing@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING

FORM LETTER B 264: PETER ALSINA

Response to Comment B 264-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 265

Dist 3

RECEIVED

JAN 24 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 265-1 there are currently 3 new large development going on in town building over 300 new homes and adding probably twice that many new cars, adding to the already difficult traffic situation. If this new business expects to import 300 new jobs then that will bring in hundreds more vehicles. That doesn't count the amount of trucking that will going through the basin. Why would we want to make an already worsening situation even more intolerable? besides the fact that this company IS NOT TRUSTWORTY!

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Peter Alsing

Address: 10860 Dolores Dr. Grass Valley Ca.

Phone number: 707 695 9910

Email: pjalsing@hotmail.com

FORM LETTER B 265: PETER ALSINA

Response to Comment B 265-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 266

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/23/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

There is Risk to our health, our environment, our property value and our peace and quiet. Hard Rock mining is the single largest source of toxic waste in the United States. We must Protect our water and ecosystems.

B 266-1

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Prairie Rose Bauman

Address: 531 N. Pine St Nevada city CA 95959

Phone number: 530-277-5907

Email: yubasunshine@gmail.com

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

[Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington]

FORM LETTER B 266: PRAIRIE BAUMAN

Response to Comment B 266-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 267

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 4/4/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- The mine will pollute our air and increase lung disease.
- Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley
- If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.
- There is serious risk to our health, our environment, our property value, and our peace and quiet.
- Hard rock mining is the single largest source of toxic waste in the United States.
- Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives
- A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

B 267-1

- Crushing of 1,500 tons of mine waste every day, all day, using massive machines
- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells
- Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems
- Use of over 12% of Nevada County's electricity, more than all the County businesses combined
- Numerous Rise Gold violations of mining and environmental laws in Canada and here – already
- Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)
- Business life that depends on tourism will be hurt

- Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)
- A working mine will damage neighborhoods with shattered peace and quiet
- Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!
- While Rise Gold shareholders (largely Canadian) profit, the local community gets little.
- The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.
- Where will the imported workers live when housing is already so limited in our area?
- 85% of vendor spending will not be local
- Nevada County revenue will be only from property taxes, all other taxes will go to the state
- The history and business practices of Rise Gold do not inspire trust
- Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date
- Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts
- There are many questions as to the financial stability of this company.
- The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Rachel McCullough

Address: 14015 Live Oak Lane Grass Valley, Ca 95945

Phone number: 530-263-2362

Email: onesweetcowgirl@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 267: RACHEL MCCULLOUGH

Response to Comment B 267-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Vibration associated with blasting is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Finally, regarding concerns about underground blasting effects throughout the mineral rights area, please see Master Response 7.

Form Letter B 268

Dist 1

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

MAR 2 4 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3.22.22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- A huge use & subsequent waste of PRECIOUS WATER, what about the drought?
- Noise & pollution
- More electricity used than all county households combined

B 268-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name:
RANDI PRATIN
Address:
10222 Elliott Way Nevada City, CA 959595
Phone number:

Email:
Htaillep@earthlink.net

FORM LETTER B 268: RANDI PRATINI

Response to Comment B 268-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about water consumption and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding air pollution and electricity consumption, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 269

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-4-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 269-1

So much beauty here in Nevada County, Please stop this mine from opening So not a good idea for so many reasons our waters pollution, our roads, ... Lets no destroy our beautiful county. Greed is a bad thing. Moved to Grass Valley in 1967. Have never left.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: RHONDA YOUNG

Address: 53 Rockwood DR, Grass Valley CA 95945

Phone number:

Email: Srhonda759@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 10 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 269: RHONDA YOUNG

Response to Comment B 269-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 270

FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-4-2022
Dist 3

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

There is so much beauty in our County, Lets not let out of towners come in and destroy our Beauty, Pollution, waters ooo Greed should never come First. I moved here to Nevada County, in 1967.

B 270-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Rhonda Young

Name: RHONDA YOUNG

Address: 53 Rockwood Dr. Grass Valley CA 95945

Phone number:

Email: SRhonda759@gmail.com

FORM LETTER B 270: RHONDA YOUNG

Response to Comment B 270-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 271



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are: The Water table will be sucked dry. Peoples wells will be drained. As the water table is polluted and drained of the trees will die. This mine cares zero about the environment and the people. It will ruin the quality of life and decimate the environment. Pollution, Noise, Fire hazard. The housing market will drop. Obviously those who vote for Rise mine are taking bribes to push this through. Use your Critical thinking.

B 271-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: RICHARD CALLAN

Address: 11153 Cement Hill Rd

Phone number: 530 210 - 9874

Email: Rcallan0332 gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 271: RICHARD CALLAN

Response to Comment B 271-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about effects on nearby wells and water quality, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 – Discharge to South Fork Wolf Creek.

Form Letter B 272

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- Over 80% of Gold is mined for Wealth ~~Re~~ Accumulation
- Do we really need to increase our energy use by 25%
- Do you want your kids to work underground in a mine? And they won't be making $93,000 That's an Average Salary. Out of town Executives will make the $$$$$

B 272-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, BAD FOR TOURISM
BAD FOR REAL ESTATE VALUES

Name: ROB KATZENSTEIN

Address: 245 N. AUBURN GRASS VALLEY CA 95945

Phone number: 530-218-7124

Email: robkatsolar@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 272: ROB KATZENSTEIN

Response to Comment B 272-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 273

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 19, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 273-1

Pollution of air, water & the general environment, Distrust of this company and belief that this Project is not right for this place and time. There's already more than sufficient residual damage from industrial scale mining in this County. I recommend re-zoning of the Site to prevent future re-opening applications.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Robert Erickson

Name: Robert Erickson

Address: 144 Success Mine Loop, Grass Valley, CA 95945

Phone number: 530-205-0429 (cell) or 9751 (Home)

Email: ericksonrobert589@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 273: ROBERT ERICKSON

Response to Comment B 273-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 274

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: January 19, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pollution of air, water & the general environment. I don't believe this company can be trusted to do the right thing for us. I recommend the application be denied and the site re-zoned to prevent any future application to re-open this mine.

B 274-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Robert Erickson

Name: Robert Erickson

Address: 144 Success Mine Loop, Grass Valley, CA 95945

Phone number: 530-205-0429 (cell) or 9751 (Home)

Email: ericksonrobert58@gmail.com

FORM LETTER B 274: ROBERT ERICKSON

Response to Comment B 274-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 275

Dist 1

RECEIVED
FEB 16 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/3/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Water Pollution
Wells
Noise
Environmental waste
traffic
Air pollution

B 275-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Robert Trent

Address: 512 Jordan St
Nevada City, CA 95959

Phone number: 530 377-6495

Email: rtrent_98@yahoo.com

FORM LETTER B 275: ROBERT TRENT

Response to Comment B 275-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 276

Dist 1

RECEIVED
MAR 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/23/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 276-1

Environmental
Concern for Rise Gold's history of
bankruptcy
Neighborhood noise, pollution, etc

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Roberta Terra Hue

Name: Roberta Terra Hue
Address: 10453 Park Ave Ext
N.C. CA 95959
Phone number: 530-401-4414
Email: terralove9@gmail.com

FORM LETTER B 276: ROBERTA HUE

Response to Comment B 276-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 277

RECEIVED

JAN 21 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January-19-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

As a homeowner, according to a study by local realtors, my property can loose an estimated 20% in property values if the mine is opened due to the effects on the environment; air pollution and cancer risk due to toxic particles being released into the air, water pollution, traffic in Grass Valley, and excess noise. This will deter people from moving here for retirement.

I live close to Hwy 49 in Berriman Ranch and would have to put up with the noise of a constant convoy of trucks hauling loads for processing out of town down Hwy 49 night and day.

B 277-1

Nearby Wolf Creek that my family recreates at, would be flooded with mine waste water and stir up toxic residues that will harm the environment.

Businesses and the local economy that depend on tourism will be hurt when our bucolic Sierra Foothill community is reduced to an industrial site.

If approved, the mine will operate 24 hours a day, 7 days a week, for up to 80 years.There is serious risk to our health, our environment, our property values, and our peace and quiet.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Robin S. Hart
Address: 110 Berriman Loop, Grass Valley, CA 95949
Phone number: 530-271-7121
Email: rhstarbird@gmail.com

FORM LETTER B 277: ROBIN HART

Response to Comment B 277-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 278

RECEIVED
JAN 21 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 19, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

As a homeowner, according to a study by local realtors, my property can loose an estimated 20% in property values if the mine is opened due to the effects on the environment; air pollution and cancer risk due to toxic particles being released into the air, water pollution, traffic in Grass Valley, and excess noise. This will deter people from moving here for retirement.

I live close to Hwy 49 in Berriman Ranch and would have to put up with the noise of a constant convoy of trucks hauling loads for processing out of town down Hwy 49 night and day.

B 278-1

Nearby Wolf Creek that my family recreates at, would be flooded with mine waste water and stir up toxic residues that will harm the environment.

Businesses and the local economy that depend on tourism will be hurt when our bucolic Sierra Foothill community is reduced to an industrial site.

If approved, the mine will operate 24 hours a day, 7 days a week, for up to 80 years.There is serious risk to our health, our environment, our property values, and our peace and quiet.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Name: Robin S. Hart

Address: 110 Berriman Ranch, Grass Valley, CA 95949
Phone number: 530-271-7121
Email: rhstarbird@gmail.com
Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 278: ROBIN HART

Response to Comment B 278-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 279

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3-23-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 279-1

Rise Gold has a history of destructive environmental disasters that they have failed to clean up. Even if Rise is able to break their historical chain of environmental destruction. business as anticipated will be destructive and disruptive. Hard rock mining releases substantial levels of toxic materials into the air and water including asbestos, Mercury, cyanide and lead. Waste water will be dumped into our rivers and asbestos into our air. Rise will operate 24/7. heavily laden trucks will pollute our town and ruin our roads. Please Reject Rise Gold.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Ross McKnight

Address: 13206 Banner Lava Cap Rd Nevada City

Phone number: 860 6704832

Email: r.mcknight.photography@gmail.com

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 279: ROSS MCKNIGHT

Response to Comment B 279-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 280

Dist 3

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

MAR 07 2022 Date: March 1 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I have looked at what I could find and any report that indicates that this a safe project and will have little or no impact on the surrounding environment or on the Earth has to be reading a novel or some other material besides the scientific evidence that we are in trouble everywhere on the Earth. Extinction of species is happening at an alarming rate. Rapid changing weather patterns are destroying the Earth, the Plants and affecting rain fall drastically. I dont think it is responsible to add any stress on the Earth regardless what any report says.

B 280-1

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Ruth Ghio

Address: 124 Success Mine Loop GV 95945

Phone number: 530 277-6955

Email: rghio@me.com

Ruth Ghio

FORM LETTER B 280: RUTH GHIO

Response to Comment B 280-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 281

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 20, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 281-1

I strongly oppose the mine. Given the climate issues and the stress on the planet, I believe there is no way to predict the effect of the mine, the underground tunnels and continuous digging will have on our community and its inhabitants

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our mission calls us "to use our human, spiritual and financial resources to make a difference in our local community and the world." Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Ruth Ghio

Name: Ruth Ghio

Address: 124 Success Mine Loop

Phone number: (530) 277-6955

Email: rghio@me.com

RECEIVED
MAR 08 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 281: RUTH GHIO

Response to Comment B 281-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 282

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/31/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pollution of air, water, land & noise!

B 282-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Ruth M Jones

Address: 12768 Banner Lava Cap Rd NC 95959

Phone number:

Email: nickiejim@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 282: RUTH JONES

Response to Comment B 282-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 283

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/31/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pollution of air, water, land & noise!

B 283-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Ruth M Jones

Address: 12768 Banner Lava Cap Rd NC 95959

Phone number:

Email: nickiejim@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 283: RUTH JONES

Response to Comment B 283-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 284

Dist 1 RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: MAR 2 4 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 284-1

The DEIR was funded by Rise Gold Corp. and is therefore biased. I can't believe Nevada County would risk ground water supply and quality in this terrible drought. The daily truck trips seem intolerable for those living near the road and the resulting air pollution.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: **Sandra & Jack Burke**

Address: **12701 Red Dog Rd Nevada City, CA 95959**

Phone number:

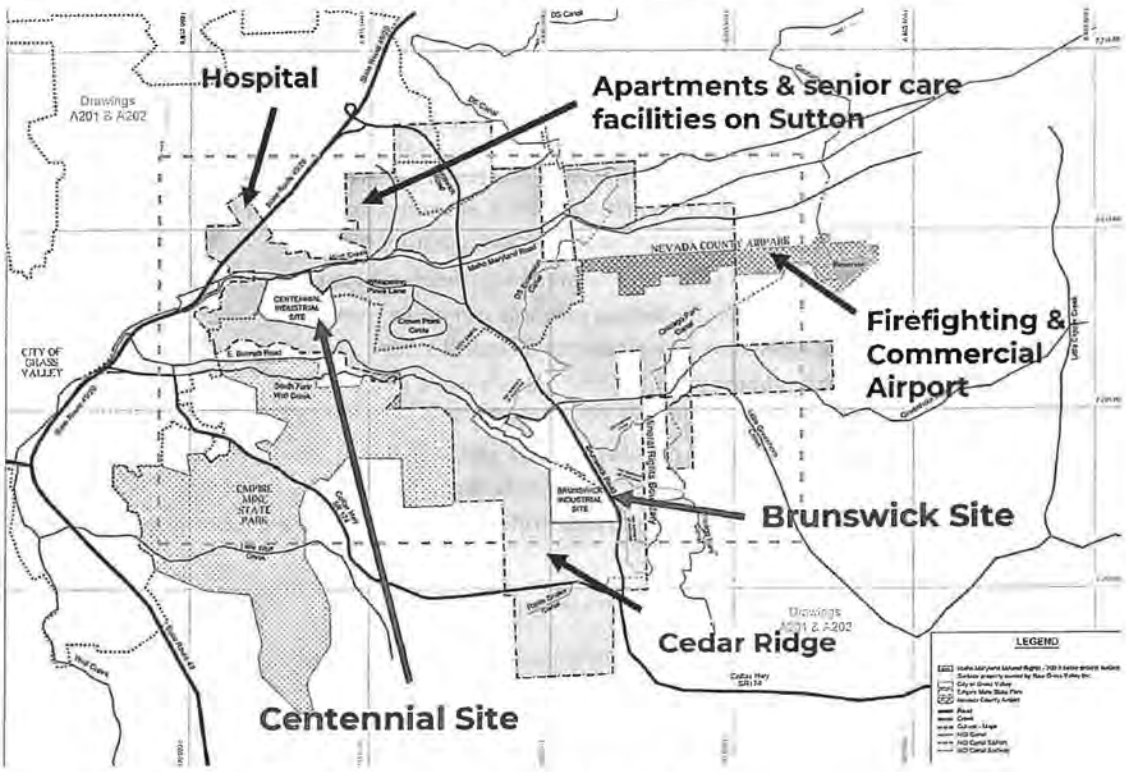
Email:

The Truth about the Rise Gold Mine

Dozens of residents contributed to this including the ***Elders Action Network.***

Over 3000 citizens have filled in the petition at www.MineWatchnc.org

Rise Mine plans map: (Brunswick Site=115 acre industrial center; Centenial=toxic waste dump)



* Grey area is where they can tunnel and blast (mining rights)

For the evidence:

Mine Watch Nevada County website https://www.minewatchnc.org/ by Community Environmental Advocates Foundation

MinewatchNC Mine opposition reasons https://www.minewatchnc.org/why-stop-the-idaho-maryland-mine

Martin Webb's talk on energy return-on-investment https://www.minewatchnc.org/post/energy-roi-we-can-do-better-martin-webb

Draft Environment Impact Report https://www.mynevadacounty.com/3436/Idaho-Maryland-Mine-Draft-EIR

Nevada County document website https://www.mynevadacounty.com/2862/Application-Documents---Rise-Grass-Valley

Centennial Site Cleanup Remedial Action Plan - Department of Toxic Substances Control (DTSC) https://www.envirostor.dtsc.ca.gov/public/community_involvement/11955239/527a.04%20Draft%20Final%20RAP%20%20Centennial%20M-1%20Property_1_25_2021.pdf

2 | P a g e

The Truth about the Rise Gold Mine

The Nevada County Board of Supervisors can vote to stop reopening the Idaho–Maryland Gold Mine by Rise Gold Corp. a Canadian Corp. also incorporated in Nevada.

Approval of Rise Gold Corporation's proposal will result in:

- **A large, heavy-industry factory** on 119 acres on Brunswick Rd. in the middle of hundreds of homes (zoned residential)
- **Crushing and moving 1,500 tons of mine waste every day, all day,** using massive machines
- **Hauling trucks carrying 1,000 tons of waste rock --over 100 round trips every day –** down Brunswick Rd. to a 56-acre location (Centennial toxic dump) less than ½ mile from downtown Grass Valley, piling it higher than a 6-story building
- **Trucks and heavy machinery will produce diesel exhaust from continuous operation**
- **Clouds of mining dust including asbestos** can move over Grass Valley from digging and dumping 1,500 tons of contaminated landfill a day
- **Blasting, earth-shaking explosions** 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (including the Hospital) that can be felt inside homes
- **Over 3.5 million gallons per day to start and then 1.2 million gallons per day of waste mine water** pumped into Wolf Creek then to Bear River for the next "80 years"
- **12% of Nevada County's electricity will be taken by the Mine, more than all the County businesses combined**

What impacts are predicted if the Mine is approved?

Air pollution will worsen respiratory problems in Grass Valley **and probably increase the death rate** in Western Nevada County (expert conclusion), especially among the most vulnerable such as the elderly (over 7 hospital & senior care facilities are near the Centennial dump site). (https://www.minewatchnc.org/post/dr-newsom-on-health-risks-of-mine)

The South Fork of Wolf Creek will likely have stirred up mercury, toxic chemical residues (like cyanide & lead), and serious erosion.

Real-estate value in the vicinity will drop more than 20% (Realtors' estimate in the Union).

Loss or damage to hundreds of homeowners' wells likely from mine dewatering.

Few local jobs and little tax revenue. See Martin Webb at Minewatchnc.org and *Rise Gold Project Description* p.26 (mynevadacounty.com)

Inadequate regulation because there are not enough government personnel. Based on history, the fixes for damages will not be enforced (https://www.minewatchnc.org/post/no-state-monitor-for-mine). Legal charges against Rise Mine Corp. in Canada for failure to clean up their toxic sites are pending in court.

FORM LETTER B 284: SANDRA BURKE

Response to Comment B 284-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water supply, water quality, and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 – Drought and Climate Change, and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding concerns about air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 285

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: February 25, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading, and manipulative. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The mine will pollute our air due to toxic mining dust, including asbestos, which will increase lung disease. There will be massive amounts of diesel exhaust produced from the continuous movement of trucks hauling waste rock making over 100 trips per day. There is also the possibility of dewatering wells for residences near the site.

B 285-1

Rise Gold CEO, Ben Mossman has been charged with an environmental disaster in British Columbia, Canada. He was involved in a corporation called Banks Island Gold, Ltd. The mine had so many non-compliance and safety issues that it was ordered closed by the British Columbia government. It went into bankruptcy and the province has a huge environmental waste site to clean up at taxpayers expense. Besides this there are numerous questions about the financial stability of this company.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Sandra H. Yanko

RECEIVED
MAR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: Sandra Yanko
Address: 199912 Echo Blue Dr., Penn Valley, CA 95946
Phone number: 530-432-2579
Email: echoblue@mac.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 285: SANDRA YANKO

Response to Comment B 285-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 286

Dist 4 RECEIVED

MAR 01 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 25, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading,and manipulative. Their untruthful "poll" of our sample citizenry, complete with prevarications of support for the mine, have been an affront, plastered on the back page of the Union. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The mine will pollute our air due to toxic mining dust, including asbestos, which will increase lung disease. There will be massive amounts of diesel exhaust produced from the continuous movement of trucks hauling waste rock making over 100 trips per day. There is also the possibility of dewatering wells for residences near the site.

B 286-1

Rise Gold CEO, Ben Mossman has been charged with an environmental disaster in British Columbia, Canada. He was involved in a corporation called Banks Island Gold, Ltd. The mine had so many non-compliance and safety issues that it was ordered closed by the British Columbia government. It went into bankruptcy and the province has a huge environmental waste site to clean up at taxpayers' expense. Besides this there are numerous questions about the financial stability of this company.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Sandra H. Yanko

Name: Sandra Yanko
Address: 19912 Echo Blue Dr., Penn Valley, CA 95946
Phone number: 530-432-2579
Email: echoblue@mac.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 286: SANDRA YANKO

Response to Comment B 286-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 287

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
MAR 15 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3/9/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- THE EFFECTS ON OUR WATER RESOURCES ARE SERIOUSLY UNDERESTIMATED. THE IMPACT ON WELLS & AQUIFERS IS DIFFICULT TO ESTIMATE DUE TO MINES, FISSURES & CRACKS UNDER THE COUNTY.
- TOURISTS & RESIDENTS WILL LEAVE THE COUNTY DUE TO NOISE, DRY WELLS & TRAFFIC.
- MOSSMAN IS A BAD FINANCIAL RISK. HE'LL LEAVE THE COUNTY WITH AN ENVIRONMENTAL DISASTER WHICH WILL TAKE DECADES TO REMEDIATE.
- 300 SUPPOSED JOBS IS NOT WORTH THE DISASTER THE MINE WILL CAUSE.

B 287-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Sandy Pack

Name: SANDY PACK

Address: 11892 POLARIS DR GV

Phone number: 530-575-1663

Email: SANDYPACK2@YAHOO.COM

FORM LETTER B 287: SANDY PACK

Response to Comment B 287-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 288

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: MARCH 9, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- THE EFFECTS ON OUR WATER RESOURCES CANNOT BE PREDICTED DUE TO THE MINES CRACKS & FISSURES THAT ARE INTERCONNECTED.
- MOSSMAN HAS A VERY POOR FINANCIAL REPUTATION AND A VERY BAD ENVIRONMENTAL RECORD. WE'LL BE CLEANING UP HIS MESSES FOR DECADES.
- EFFECTS ON THE ENVIRONMENT OF HUGE TAILINGS PILES IS WILDLY UNDERESTIMATED IN THE DEIS.

B 288-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sandy Pack

RECEIVED
MAR 14 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: SANDY PACK

Address: 11892 Polaris Dr GV

Phone number: 530-575-1663

Email: SANDYPACK2@YAHOO.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 288: SANDY PACK

Response to Comment B 288-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With regard to concerns related to water resources, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 289

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-15-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THE MINE WILL POLLUTE AIR AND WATER, DEGRADING PUBLIC HEALTH AND QUALITY OF LIFE. WHILE RISE GOLD SHARE HOLDERS MIGHT PROFIT, MOST OF THAT PROFIT WILL LEAVE THE COUNTY, AND THE ENVIRONMENTAL HARM COULD NEGATIVELY IMPACT THIS COMMUNITY FOR DECADES.

B 289-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: SEQUOIA HAUGHEY

Address: 17346 EXCELSIOR DITCH CAMP RD., NEVADA CITY

Phone number: 530 228 0838

Email: sequoiahaughey@yahoo.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 22 2022
NEVADA COUNTY PLANNING DEPARTMENT

FORM LETTER B 289: SEQUOIA HAUGHEY

Response to Comment B 289-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Form Letter B 290

Dist 3

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/15/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THE MINE WILL POLLUTE AIR AND WATER, DEGRADING PUBLIC HEALTH, AND QUALITY OF LIFE. WHILE RISE GOLD SHARE HOLDERS MIGHT PROFIT, THAT PROFIT WILL LEAVE THE COUNTY, AND THE ENVIRONMENTAL HARM COULD NEGATIVELY IMPACT THIS COMMUNITY FOR DECADES.

B 290-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: SEQUOIA HAUGHEY

Address: 17346 EXCELSIOR DITCH CAMP RD, NEVADA CITY

Phone number: 530 228 0838

Email: sequoiahaughey@yahoo.com

FORM LETTER B 290: SEQUOIA HAUGHEY

Response to Comment B 290-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Form Letter B 291

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/11/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 291-1 This Mine would create air, noise and water pollution, as well as a significant increase in traffic, all of which would lead to a degredation of our quality of life. In short there is no justification for reopening the Idaho-Maryland Mine. We need to be focused on solving the significant problems we have ahead of us, not creating new ones.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Shana Maziarz

Address: 10145 Tillicum Way
NC, CA 95959

Phone number: (530) 210-1082

Email: shana.maziarz@gmail.com

RECEIVED
FEB 14 2022
PLANNING

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 291: SHANA MAZIARZ

Response to Comment B 291-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 292

Dist 1

RECEIVED
FEB 14 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2/11/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 292-1

This mine would create air, noise and water pollution, as well as a significant increase in traffic, all of which would lead to a degradation of our quality of life. In short, there is no justification for reopening the Idaho-Maryland Mine. We need to be focused on solving the significant problems we have ahead of us, not creating new ones.

I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Shana Maziarz

Address: 10145 Tillicum Way, Nevada City, CA 95959

Phone number: 530·210·1082

Email: shana.maziarz@gmail.com

FORM LETTER B 292: SHANA MAZIARZ

Response to Comment B 292-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 293

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/2/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We, Nevada County, are so far beyond going backwards to an active mining county!! Look at the population, water tables, pollution on so many levels. JOBS - that is a joke - we cannot fill the ones we currently have.

B 293-1

Question, who is getting paid off to approve this scheme?? They have a very poor track record!!

NO, NO, NO

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sheila Baker

Name: Sheila Baker

Address: 629 E. Broad St. Nevada City

Phone number: 530-265-3106

Email: godisago@msn.com

RECEIVED
FEB 03 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 293: SHEILA BAKER

Response to Comment B 293-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 294

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/2/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 294-1

We, Nevada County, are so far beyond going backwards to an active mining county!! Look at the population, water tables, pollution on so many levels, JOBS - that is a joke - we cannot fill the ones we currently have. Question, who is getting paid off to approve this scheme?? They have a very poor track record!!
NO, NO, NO

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sheila Baker

Name: Sheila Baker

Address: 629 E. Broad St. Nevada City

Phone number: 530-265-3106

Email: godisago@msn.com

RECEIVED
FEB 03 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 294: SHEILA BAKER

Response to Comment B 294-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 295

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/2/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We, Nevada County, are so far beyond going backwards to an active mining county!! Look at the population, water tables, pollution on so many levels, JOBS - that is a joke - we cannot fill the ones we currently have.

B 295-1

Question, who is getting paid off to approve this scheme?? They have a very poor track record!!

NO, NO, NO

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sheila Baker

Name: Sheila Baker

Address: 629 E. Broad St. Nevada City

Phone number: 530-265-3106

Email: godisago@msn.com

FEB 03 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 295: SHEILA BAKER

Response to Comment B 295-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 296

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/2/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

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We, Nevada County, are so far beyond going backwards to an active mining county!! Look at the population, water tables, pollution on so many levels. Jobs - that is a joke - we cannot fill the ones we currently have. Question, who is getting paid off to approve this scheme?? They have a very poor track record!! NO, NO, NO

B 296-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sheila Baker

Name: Sheila Baker

Address: 629 E. Broad St. Nevada City

Phone number: 530-265-3106

Email: godisago@msn.com

FEB 03 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 296: SHEILA BAKER

Response to Comment B 296-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 297

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/2/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

We, Nevada County, are so far beyond going backwards to an active mining county!! Look at the population, water tables, pollution on so many levels. JOBS - that is a joke - we cannot fill the ones we currently have. Question, who is getting paid off to approve this scheme?? They have a very poor track record!! NO, NO, NO

B 297-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Sheila Baker

Name: Sheila Baker

Address: 629 E. Broad St. Nevada City

Phone number: 530-265-3106

Email: godisgo@msn.com

FEB 03 2022

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 297: SHEILA BAKER

Response to Comment B 297-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 298

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2-16-2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

pumping millions of cubic feet of ground water, danger all residential wells, especially during current drought situation.

The mine will pollute our air and increase lung disease. Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S. Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
B 298-1 Tourism will be hurt, based on the potential damage noted above. If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Shirley Fenicle

Name: SHIRLEY FENICLE

Address: 13833 CONNAUGHT PLACE, NEVADA CITY, CA. 95945-9

Phone number: 1-530-265-8214

Email: ~~SHIRLEY~~ SFENICLE @ ATT. NET

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 298: SHIRLEY FENICLE

Response to Comment B 298-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 299

Dist 1

RECEIVED Date: 2-16-2022

FEB 17 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Pumping Millions of cubic feet of ground water dangers all wells. especially during drought situations.

The mine will pollute our air and increase lung disease.
Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S.
Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
Tourism will be hurt, based on the potential damage noted above.
If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

B 299-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Shirley Fenicle

Name: SHIRLEY FENICLE

Address: 13833 CONNAUGHT PLACE NEVADA City, CA 95959

Phone number: 1-530-265-8214

Email: SFENICLE@ATT.NET

FORM LETTER B 299: SHIRLEY FENICLE

Response to Comment B 299-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 300

1837

RECEIVED
JAN 20 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 300-1

Environmentally, the whole mine idea simply stinks! Our water and air health are far more valuable to our community than any "profit" which might (but probably wouldn't) occur. It's time to think about a healthy plan for our beautiful community.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Shirley Osgood

Name: Shirley Osgood

Address: 13234 Ridge Road
Grass Valley CA 95945

Phone number: 941-320-0291

Email: slogood481@hotmail.com

FORM LETTER B 300: SHIRLEY OSGOOD

Response to Comment B 300-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 301



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 301-1 Environmentally, the whole mine idea simply stinks! Our water and air are far more valuable than any "profit" to our community which might (but probably wouldn't!) occur. It's time to think about a healthy plan for our community! NO MINE!!

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Shirley Osgood

Name: Shirley Osgood

Address: 13234 Ridge Rd, Grass Valley CA 95945

Phone number: 941-320-0291

Email: slogood481@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 301: SHIRLEY OSGOOD

Response to Comment B 301-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 302

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: January 3, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 302-1

Because I live near the mine site, off Brunswick by the "Y" – at hwy. 174
1- traffic with trucks hauling waste rock down Brunswick Road – also diesel exhaust
2- blasting in tunnels under my home – noise pollution
3- fear of penetrating my well-
4- general pollution of our air

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Shirley Porter
Address: 12968 Burma Road – G.V.
Phone number: 530-272-7380
Email: Shirley@burmaoaks.com

FORM LETTER B 302: SHIRLEY PORTER

Response to Comment B 302-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding air pollution, including toxic air contaminants such as diesel exhaust, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 303

Dist 4

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 4/22/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

POTENTIAL WATER DEPLETION
NOISE & TRAFFIC
Minimal local benefits

B 303-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Solomon Bassoff

Address: PO Box 923

Phone number: 5309139843

Email: solomonbassoff@gmail.com

FORM LETTER B 303: SOLOMON BASSOFF

Response to Comment B 303-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 304

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

JAN 28 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 1/23/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. UNFORESEEN ISSUES RELATED TO GROUND WATER & SUBSURFACE GEOLOGIC CONCERNS.
2. NOISE, TRAFFIC, CONSTRUCTION ACTIVITIES DISRUPTIVE TO NATIVE ENVIRONMENT.

B 304-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: SPENCER WINGFIELD

Address: 12156 DOGWOOD RD. GRASS VALLEY CA 95945

Phone number: 530-362-3217

Email: SPENCERWWINGFIELD@GMAIL.COM

FORM LETTER B 304: SPENCER WINGFIELD

Response to Comment B 304-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Impacts related to geologic hazards are addressed in Chapter 4.6 of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 305

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/23/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- IM CONCERNED THAT THERE WILL BE UNFORESEEN DELETERIOUS EFFECTS TO THE SUBSURFACE ENVIRONMENT, INCLUDING GROUNDWATER.
- WE NEED GOOD JOBS IN THE AREA, THOSE IN RENEWABLES
- I LIVE UPSTREAM OF SITE & AM CONCERNED ABOUT NOISE, INCREASED CONSTRUCTION TRAFFIC, DETERIORATING ROADS & DISRUPTION TO OUR NATIVE ENVIRONMENT. IF YOU WANT GRASS VALLEY TO LOOK LIKE LINCOLN. GO MOVE TO LINCOLN.

B 305-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: SPENCER WINGFIELD

Address: 12156 DOGWOOD RD GRASS VALLEY, CA 95945

Phone number: 530 300 3217

Email: SPENCERWWINGFIELD@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 31 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 305: SPENCER WINGFIELD

Response to Comment B 305-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3. Economic concerns are outside the scope of CEQA – Please see Master Response 2.

With respect to concerns regarding groundwater, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 306

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. Extractive Industry: Western Nevada County is still dealing with effects of past mining; so please do not make that a possibility again: vote NO.
2. Bond: If you vote in favor of the mine, please request that Rise Gold post a Bond sufficient to cover future mitigation costs, so they are not a encumbrance on residents/county.
3. Environmental:

B 306-1

wildlife · flora · watershed · air/sound quality · property values · Better minds than mine have expressed reasoning concerning these issues in the CEQA process. I add my voice to theirs.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Name: Star Carroll

Address: 174 Boulder Street, Nevada City

Phone number: 530.265.1963

Email: StarCarroll4@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 306: STAR CARROLL

Response to Comment B 306-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Form Letter B 307

Dist 5

RECEIVED
Date: 3-3-2022
MAR 09 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 307-1 I have had personal experience with mining companies as an Appraiser for San Bernardino County assessors office. The companies will say whatever it takes to pursue their agenda of making money. They usually have to put a bond up to guarantee remediation BUT they will forfeit the bond because it is more cost effective to pay bond than actually do the work! Please Please Dont approve this disasterous operation

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Sue Cutuli
Address: 11939 Casci Ridge Road
Nevada City
Phone number: 909 936 6969
Email: SCutuli@hotmail.Com

FORM LETTER B 307: SUE CUTULI

Response to Comment B 307-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 308

RECEIVED
MAR 1 1 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-3-2022

Dear Planning Commisson
Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 308-1

I have had personal experience with mining companies as an Appraiser for San Bernardino County assessors office. The companies will say whatever it takes to pursue their agenda of making money. They usually have to put a bond up to guarantee remediation BUT they will forfeit the bond Because it is more cost effective to pay bond than actually do the work! Please Please Dont approve this disasterous operation

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Sue Cutuli

Address: 11939 Casci Ridge Road Nevada City

Phone number: 909 936 6969

Email: SCutuli@hotmail.Com

FORM LETTER B 308: SUE CUTULI

Response to Comment B 308-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 309

Dist 3

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2/4/22

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The mine will pollute our AIR & increase LUNG disease

B 309-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,
Susan Hart

Name: SUSAN HART

Address: 253 FAIRMONT DR., GRASS VALLEY, CA 95945

Phone number: 530-277-3193

Email:

FORM LETTER B 309: SUSAN HART

Response to Comment B 309-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, including toxic air contaminants, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 310



Susan Joanne
c/o 2036 Nevada City Highway, #44
Grass Valley, California [95945]

February 18, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners: Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find that Rise Gold to be inconsistent, misleading, and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The main mine access and processing facilities will be located at the 119-acre New Brunswick site located at the corner of Brunswick and East Bennett Roads. Operations will also utilize the 56-acre Centennial site on Idaho-Maryland Road west of Centennial Drive to dispose of mine-waste.

B 310-1

Mining will take place 24 hours a day, 7 days a week. About 1500 tons of waste rock and tailings will be removed from the mine daily. Of this, 500 tons per day will be mixed with cement to form a paste backfill and re-deposited into the mine. The remaining 1000 tons per day will be deposited at the Centennial site and at a 31-acre area along Brunswick Road just south of the processing facility and bounded by neighborhoods on Cedar Ridge Drive, Elk Lane, and Mink Court.

Waste rock and tailings from the mine will be **transported by trucks making up to 100 round trips per day, 16 hours per day, 7 days per week**. To get to the Centennial site, they will turn left onto Brunswick Road about 0.4 miles south of East Bennett Rd, pass through the intersection of East Bennett and Brunswick and turn left onto Whispering Pines Lane to reach Centennial Drive.

At the Centennial site, an area of **44 acres will be built up with "engineered fill" to depths of up to 70 feet**, eventually forming a 37-acre graded surface that may be utilized for future development. Similarly, the mine waste dumped at the Brunswick Road site will eventually cover an area of **31 acres and be built up as much as 90 feet** to form a 21-acre graded area for possible future industrial uses.

The trucks will be loaded with rock with a front-end loader. **Hauling will take place 6:00 AM – 10:00 PM, 7 days a week.** After the rock is dumped, it will be **graded and compacted 7:00 AM – 3:30 PM, 7 days a week, using bulldozers, graders, and rolling**

compactors. This activity will take place continuously for 11 years or until both build-up areas are maximized. After that, mine waste materials will have to be hauled out via Brunswick Road to Glenbrook Basin in order to access Hwy 49 for transport to sites not yet identified.

In terms of energy use, the permit application estimates a PG&E power net load of 6000 Kilowatts (KW). Planned diesel backup power generation capacity is 6000 KW. Electricity utilization is estimated at 42,757,000 Kilowatt-Hours (KWH) per year. This is equivalent to the electric use of about 5000 houses.

Full operations of the mine, including fuel for equipment, electricity, and other operational uses are estimated to produce around 9,000 metric tons of greenhouse gas emissions per year.

Cement, explosives, diesel, and various other chemicals will be regularly transported to the site and stored. Cement will be mixed with tailings and pumped back underground and used to backfill mining voids. By one estimate, the backfill paste will use approximately 25 tons of cement daily. Explosives will include ANFO (Ammonium Nitrate and Fuel Oil), and Ammonium Nitrate Emulsion. Up to 28,000 lbs. of explosives will be stored onsite underground. Diesel fuel storage will consist of a 30,000-gallon aboveground storage tank. A number of other chemicals will be utilized for processing the gold using the sulfide flotation system and other activities.

Industrial buildings covering 122,000 square feet are proposed for the New Brunswick site. Noteworthy among these would be the gold processing plant with dimensions of 425 feet by 70 feet and 65 feet high, and the shaft headframe building with a height of 165 feet. Running between these buildings will be a 365' long enclosed conveyor system. Tailings will be stockpiled onsite while waiting for transport.

The application to re-operate the Idaho-Maryland mine states that 312 jobs would be created by the mine operations. Of those jobs, 242 jobs are specialized technical positions likely taken by people recruited from outside the area. The remaining jobs, truck transport of mine waste, and mineral processing, could provide 70 jobs for current local residents.

I want no part of any of this in my community. PERIOD!

I live on the land at Nevada County and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Susan Joanne

(530) 615-8548
nevadasierras@yahoo.com

cc: Director of Planning, Brian Foss; Senior Planner, Matt Kelley; Principle Planner, Tyler Barrington

FORM LETTER B 310: SUSAN JOANNE

Response to Comment B 310-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 311



Susan Joanne
c/o 2036 Nevada City Highway, #44
Grass Valley, California [95945]

February 18, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners: Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find that Rise Gold to be inconsistent, misleading, and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

The main mine access and processing facilities will be located at the 119-acre New Brunswick site located at the corner of Brunswick and East Bennett Roads. Operations will also utilize the 56-acre Centennial site on Idaho-Maryland Road west of Centennial Drive to dispose of mine-waste.

B 311-1

Mining will take place 24 hours a day, 7 days a week. About 1500 tons of waste rock and tailings will be removed from the mine daily. Of this, 500 tons per day will be mixed with cement to form a paste backfill and re-deposited into the mine. The remaining 1000 tons per day will be deposited at the Centennial site and at a 31-acre area along Brunswick Road just south of the processing facility and bounded by neighborhoods on Cedar Ridge Drive, Elk Lane, and Mink Court.

Waste rock and tailings from the mine will be **transported by trucks making up to 100 round trips per day, 16 hours per day, 7 days per week**. To get to the Centennial site, they will turn left onto Brunswick Road about 0.4 miles south of East Bennett Rd, pass through the intersection of East Bennett and Brunswick and turn left onto Whispering Pines Lane to reach Centennial Drive.

At the Centennial site, an area of **44 acres will be built up with "engineered fill" to depths of up to 70 feet**, eventually forming a 37-acre graded surface that may be utilized for future development. Similarly, the mine waste dumped at the Brunswick Road site will eventually cover an area of **31 acres and be built up as much as 90 feet** to form a 21-acre graded area for possible future industrial uses.

The trucks will be loaded with rock with a front-end loader. **Hauling will take place 6:00 AM – 10:00 PM, 7 days a week.** After the rock is dumped, it will be **graded and compacted 7:00 AM – 3:30 PM, 7 days a week, using bulldozers, graders, and rolling**

compactors. This activity will take place continuously for 11 years or until both build-up areas are maximized. After that, mine waste materials will have to be hauled out via Brunswick Road to Glenbrook Basin in order to access Hwy 49 for transport to sites not yet identified.

In terms of energy use, the permit application estimates a PG&E power net load of 6000 Kilowatts (KW). Planned diesel backup power generation capacity is 6000 KW. Electricity utilization is estimated at 42,757,000 Kilowatt-Hours (KWH) per year. This is equivalent to the electric use of about 5000 houses.

Full operations of the mine, including fuel for equipment, electricity, and other operational uses are estimated to produce around 9,000 metric tons of greenhouse gas emissions per year.

Cement, explosives, diesel, and various other chemicals will be regularly transported to the site and stored. Cement will be mixed with tailings and pumped back underground and used to backfill mining voids. By one estimate, the backfill paste will use approximately 25 tons of cement daily. Explosives will include ANFO (Ammonium Nitrate and Fuel Oil), and Ammonium Nitrate Emulsion. Up to 28,000 lbs. of explosives will be stored onsite underground. Diesel fuel storage will consist of a 30,000-gallon aboveground storage tank. A number of other chemicals will be utilized for processing the gold using the sulfide flotation system and other activities.

Industrial buildings covering 122,000 square feet are proposed for the New Brunswick site. Noteworthy among these would be the gold processing plant with dimensions of 425 feet by 70 feet and 65 feet high, and the shaft headframe building with a height of 165 feet. Running between these buildings will be a 365' long enclosed conveyor system. Tailings will be stockpiled onsite while waiting for transport.

The application to re-operate the Idaho-Maryland mine states that 312 jobs would be created by the mine operations. Of those jobs, 242 jobs are specialized technical positions likely taken by people recruited from outside the area. The remaining jobs, truck transport of mine waste, and mineral processing, could provide 70 jobs for current local residents.

I want no part of any of this in my community. PERIOD!

I live on the land at Nevada County and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Susan Joanne

(530) 615-8548
nevadasierras@yahoo.com

cc: Director of Planning, Brian Foss; Senior Planner, Matt Kelley; Principle Planner, Tyler Barrington

FORM LETTER B 311: SUSAN JOANNE

Response to Comment B 311-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 312



Susan Joanne
c/o 2036 Nevada City Highway, #44
Grass Valley, California [95945]

February 18, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners: Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find that Rise Gold to be inconsistent, misleading, and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 312-1

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Mining will take place 24 hours a day, 7 days a week. About 1500 tons of waste rock and tailings will be removed from the mine daily. Of this, 500 tons per day will be mixed with cement to form a paste backfill and re-deposited into the mine. The remaining 1000 tons per day will be deposited at the Centennial site and at a 31-acre area along Brunswick Road just south of the processing facility and bounded by neighborhoods on Cedar Ridge Drive, Elk Lane, and Mink Court.

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compactors. This activity will take place continuously for 11 years or until both build-up areas are maximized. After that, mine waste materials will have to be hauled out via Brunswick Road to Glenbrook Basin in order to access Hwy 49 for transport to sites not yet identified.

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I want no part of any of this in my community. PERIOD!

I live on the land at Nevada County and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Susan Joanne

(530) 615-8548
nevadasierras@yahoo.com

cc: Director of Planning, Brian Foss; Senior Planner, Matt Kelley; Principle Planner, Tyler Barrington

FORM LETTER B 312: SUSAN JOANNE

Response to Comment B 312-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 313



Susan Joanne
c/o 2036 Nevada City Highway, #44
Grass Valley, California [95945]

February 18, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners: Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find that Rise Gold to be inconsistent, misleading, and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 313-1

The main mine access and processing facilities will be located at the 119-acre New Brunswick site located at the corner of Brunswick and East Bennett Roads. Operations will also utilize the 56-acre Centennial site on Idaho-Maryland Road west of Centennial Drive to dispose of mine-waste.

Mining will take place 24 hours a day, 7 days a week. About 1500 tons of waste rock and tailings will be removed from the mine daily. Of this, 500 tons per day will be mixed with cement to form a paste backfill and re-deposited into the mine. The remaining 1000 tons per day will be deposited at the Centennial site and at a 31-acre area along Brunswick Road just south of the processing facility and bounded by neighborhoods on Cedar Ridge Drive, Elk Lane, and Mink Court.

Waste rock and tailings from the mine will be **transported by trucks making up to 100 round trips per day, 16 hours per day, 7 days per week**. To get to the Centennial site, they will turn left onto Brunswick Road about 0.4 miles south of East Bennett Rd, pass through the intersection of East Bennett and Brunswick and turn left onto Whispering Pines Lane to reach Centennial Drive.

At the Centennial site, an area of **44 acres will be built up with "engineered fill" to depths of up to 70 feet**, eventually forming a 37-acre graded surface that may be utilized for future development. Similarly, the mine waste dumped at the Brunswick Road site will eventually cover an area of **31 acres and be built up as much as 90 feet** to form a 21-acre graded area for possible future industrial uses.

The trucks will be loaded with rock with a front-end loader. **Hauling will take place 6:00 AM – 10:00 PM, 7 days a week.** After the rock is dumped, it will be **graded and compacted 7:00 AM – 3:30 PM, 7 days a week, using bulldozers, graders, and rolling**

compactors. This activity will take place continuously for 11 years or until both build-up areas are maximized. After that, mine waste materials will have to be hauled out via Brunswick Road to Glenbrook Basin in order to access Hwy 49 for transport to sites not yet identified.

In terms of energy use, the permit application estimates a PG&E power net load of 6000 Kilowatts (KW). Planned diesel backup power generation capacity is 6000 KW. Electricity utilization is estimated at 42,757,000 Kilowatt-Hours (KWH) per year. This is equivalent to the electric use of about 5000 houses.

Full operations of the mine, including fuel for equipment, electricity, and other operational uses are estimated to produce around 9,000 metric tons of greenhouse gas emissions per year.

Cement, explosives, diesel, and various other chemicals will be regularly transported to the site and stored. Cement will be mixed with tailings and pumped back underground and used to backfill mining voids. By one estimate, the backfill paste will use approximately 25 tons of cement daily. Explosives will include ANFO (Ammonium Nitrate and Fuel Oil), and Ammonium Nitrate Emulsion. Up to 28,000 lbs. of explosives will be stored onsite underground. Diesel fuel storage will consist of a 30,000-gallon aboveground storage tank. A number of other chemicals will be utilized for processing the gold using the sulfide flotation system and other activities.

Industrial buildings covering 122,000 square feet are proposed for the New Brunswick site. Noteworthy among these would be the gold processing plant with dimensions of 425 feet by 70 feet and 65 feet high, and the shaft headframe building with a height of 165 feet. Running between these buildings will be a 365' long enclosed conveyor system. Tailings will be stockpiled onsite while waiting for transport.

The application to re-operate the Idaho-Maryland mine states that 312 jobs would be created by the mine operations. Of those jobs, 242 jobs are specialized technical positions likely taken by people recruited from outside the area. The remaining jobs, truck transport of mine waste, and mineral processing, could provide 70 jobs for current local residents.

I want no part of any of this in my community. PERIOD!

I live on the land at Nevada County and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Susan Joanne

(530) 615-8548
nevadasierras@yahoo.com

cc: Director of Planning, Brian Foss; Senior Planner, Matt Kelley; Principle Planner, Tyler Barrington

FORM LETTER B 313: SUSAN JOANNE

Response to Comment B 313-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 314

B'314

RECEIVED
JAN 26 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

So many, but mainly pollution: air, water, noise. Negative impacts on traffic and quality of life.

In short: It's time to put the health of the planet and communities over profit.

B 314-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Susan Sanford

Name: Susan Sanford

Address: 11224 Orion Way, Grass Valley, CA 95949

Phone number: 530-446-1342

Email: susan.tgbg@gmail.com

FORM LETTER B 314: SUSAN SANFORD

Response to Comment B 314-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 315

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 23, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

So many, but mainly pollution: air, water, noise. Negative impacts on traffic and quality of life.

In short: It's time to put the health of the planet and communities over profit.

B 315-1 I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has put forth to weaken and override opposition from the local population.

Sincerely,

Susan Sanford

Name: Susan Sanford

Address: 11224 Orion Way, Grass Valley, CA 95949

Phone number: 530-446-1342
Email: susan.tgbg@gmail.com

Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 315: SUSAN SANFORD

Response to Comment B 315-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 316

Dist 3

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: March 4, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 316-1

Use of over 12% of Nevada Co's electricity, more than all the Counties businesses combined,
The Rise Gold CEO already has numerous violations of Mining and environmental laws,
Business that depend on Tourism will be hurt,
My Property Values will decline,
Clouds of airborne Toxic dust, including asbestos, will drift into Grass Valley, endangering adults & children.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Suzanne Marriott

Name: Suzanne Marriott
Address: 800 Freeman Ln. #104, Grass Valley 95949
Phone number: (510) 816-8739
Email: Smarriott2@sbglobal.net

FORM LETTER B 316: SUZANNE MARRIOTT

Response to Comment B 316-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, including toxic air contaminants such as asbestos, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 317

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: March 4, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 317-1

The mine will pollute our air and increase lung disease.
Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Rd., piling it higher than a 6-story building on the Centennial site,
Waste water will be dumped into the South Fork of Wolf Creek, destroying habitats and storing up existing toxic residues.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Suzanne Marriott

Name:
Suzanne Marriott
Address:
800 Freeman Ln. #104, Grass Valley, CA 95949
Phone number:
530 816-8739
Email: smarriott2@sbcglobal.net

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 317: SUZANNE MARRIOTT

Response to Comment B 317-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35. Finally, regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Form Letter B 318

Dist 3

RECEIVED

JAN 31 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/30/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

- THE MINE WILL NOT BRING IN ENOUGH JOBS TO JUSTIFY THE COSTS. THE JOBS THAT WILL GO TO LOCALS WILL BE THE LOWER PAYING ONES.
- I AM NOT AT ALL CONVINCED THEY HAVE A SOLID PLAN FOR WASTE DISPOSAL, CLEANUP, & REMEDIATION. ONCE THEY'VE MESSED UP THE LAND, THEY'LL GO BANKRUPT OR SOMETHING AND WE'LL BE OUT
- EYESORE, NOISY, BRIGHT LIGHTS, WEAR & TEAR ON OUR ~~ROADS~~ ROADS -- AND FOR WHAT? A FEW LOW WAGE JOBS. - FINALLY, WHAT HAPPENS WHEN THE PRICE OF GOLD DROPS? THEY MIGHT SHUT IT DOWN.

B 318-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

BUILD HOMES
NOT MINES.

Name: TAMARA ZUROMSKIS

Address: 10222 ELDER DRIVE GV, CA 95949

Phone number:

Email: ZUROMSKIS@GMAIL.COM

FORM LETTER B 318: TAMARA ZUROMSKIS

Response to Comment B 318-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 319

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/30/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THEY DON'T HAVE A GOOD PLAN FOR CLEANUP. IT'S GOING TO BE A NOISY, POLLUTING EYESORE THAT WILL ADD WEAR & TEAR ON ROADS & LIGHT POLLUTION. IT WILL PROVIDE FEW LOCAL JOBS, MOSTLY LOW PAYING. IF THE PRICE OF GOLD DROPS -- AND IT WILL -- IT MIGHT NOT BE FINANCIALLY FEASIBLE TO KEEP RUNNING, SO THEY'LL SOMEHOW AVOID CLEANUP & SKIP TOWN. GOLD ISN'T USEFUL. INVEST IN HOMES, AGRICULTURE, SOMETHING THAT HELPS PEOPLE INSTEAD OF TRYING TO DIG MONEY OUT OF THE GROUND. IT'S CHILDISH.

B 319-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: TAMARA ZUROMSKIS

Address: 10222 ELDER DR. GV, CA 95945

Phone number: (530)

Email: ZUROMSKIS@GMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 31 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 319: TAMARA ZUROMSKIS

Response to Comment B 319-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 320

Dist 1

RECEIVED
MAR 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 03/14/22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 320-1

There is SERIOUS RISK to our health, environment, our property values, and to our peace and quiet. Hard Rock mining is the single largest source of toxic waste in the US. Mining has never been a "clean business" and it never will. Waste water will destroy habitats and stir up existing toxic residue leading to disastrous effects for downstream ecosystems. Rise Gold CEO team has proven themselves to be untrustworthy. Nevada City and Grass Valley may NEVER recover fully from the harmful effects of reopening this mine!

I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Tara Kelly

Name: Tara L Kelly

Address: 10228 Dubrow Rd Grass Valley 95945

Phone number: 530 277 4433

Email: TaraFitcoach@gmail.com

FORM LETTER B 320: TARA KELLY

Response to Comment B 320-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 321

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 03/14/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 321-1

Nevada City and Grass Valley may NEVER recover from the overall harmful effects the reopening of Rise Gold likely will have on the area. There is too great a risk to our health, environment, our property values and to our peace of mind and quiet. Hard rock mining is the single largest source of toxic waste in the U.S. Mining has never been a "clean" business and never will be. Waste water will destroy habitats and stir up existing toxic residue resulting in disastrous effects for downstream ecosystems. The Rise Gold CEO team has proven themselves to be untrustworthy.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Tara Kelly

Name: Tara L. Kelly

Address: 10228 Durbrow Rd Grass Valley 95945

Phone number: 5302774433

Email: Tarafitcoach@gmail.com

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 321: TARA KELLY

Response to Comment B 321-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 322

Dist 4

RECEIVED
FEB 11 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-8-22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

All the same Reasons in opposition by the Community.

B 322-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Teena Wagner
Address: 176 Berriman loop
Phone number: 530-263-6175
Email: dirt@sbcglobal.net.

FORM LETTER B 322: TEENA WAGNER

Response to Comment B 322-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 323

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/6/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 323-1

There's Not A Single Benefit To Our Community For This Proposed Reopening. Only Shareholders & Politicians? Who Are In Their Pocket Will Gain Anything.

Wake Up & Do The Right Thing To Protect All The Beauty, Peacefulness & Small Town Atmosphere That We All Cherrish.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Teresa Freeman

Name: TERESA FREEMAN

Address: 334 S. SCHOOL ST. GRASS VALLEY, CA 95945

Phone number: 530-545-3142

Email: TFREEMAN48@HOTMAIL.COM

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 11 2022

FORM LETTER B 323: TERESA FREEMAN

Response to Comment B 323-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Form Letter B 324

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/12/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

> water quality
> increased traffic
> cost to environment
> pollution

B 324-1

I am a Nevada County ~~resident~~ frequent visitor and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: TESSIE MOORE

Address: 846 acorn Way Meadow Vista

Phone number: 831 917 7573

Email: tessiem@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 324: TESSIE MOORE

Response to Comment B 324-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 325

RECEIVED
JAN 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1/18/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 325-1 This is a very serious treat to our health, our enviroment and our peace and quiet. It will create worse air pollution, de water wells, and snarl traffic in Brunswick Basin. The gamble of an investment will possibly enrich a very few non-local people.

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Theresa Houtman

Name: Theresa Houtman
Address: 418 Chapel, Street GV, CA
Phone number: 530 277 9294
Email: Gardenangel481@Gmail.com

FORM LETTER B 325: THERESA HOUTMAN

Response to Comment B 325-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Economic concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding air pollution, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. With respect to concerns regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 326
Dist 2

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: March 20, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) The number and load of trucks each day will deteriorate the local roads to the point of needed repaving each year.

2) The noise associated with mining will impact those residences adjacent to the mining operations.

3) The quality of the air will decrease due to increased emissions from mining equipment and increased truck loads.

B 326-1

4) The vast majority of the residents in this county do not want a mining operation within the sphere of influence of Grass Valley and/or Nevada City

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Thomas L. Dyer

Name: Thomas L. Dyer

Address: 11780 Upper Circle Drive, Grass Valley, CA 95949

Phone number: (530) 273-4409

Email:

FORM LETTER B 326: THOMAS DYER

Response to Comment B 326-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding concerns about air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Form Letter B 327

dist 3

RECEIVED
JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 1.19.22

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I am not, however, opposed to mining broccoli or anything else that we actually need!

B 327-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Thomas Schreiner

Address: 12668 Nottingham Ln
Grass Valley CA 94949

Phone number: (831) 234-4855

Email: SchreinerT@aol.com

FORM LETTER B 327: THOMAS SCHREINER

Response to Comment B 327-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 328

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1-19-22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 328-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: THOMAS SCHREINER

Address: 1266 Nottingham Ln
Grass Valley CA 95949

Phone number: (831) 291-4855

Email: SchreinerT@aol.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY PLANNING DEPARTMENT

FORM LETTER B 328: THOMAS SCHREINER

Response to Comment B 328-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Form Letter B 329

RECEIVED
JAN 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: Jan. 25, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 329-1 that I am very concerned about the impact on the environment: water use, toxins released during the extrapolation of gold process, toxins trucked in, traffic pollution, noise pollution.

I am a member of the local faith-based organization, the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise Gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping Rise Gold would make a huge difference for all of us.

I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: URSULA FLINT
Address: 17868 Silver Pine Dr. Penn Valley, CA 95946
Phone number: 415-251-7868
Email: imuf@verizon.net

FORM LETTER B 329: URSULA FLINT

Response to Comment B 329-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 330

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Jan. 25, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 330-1 That I am very concerned about the impact this mine will have on the environment: water use, toxins released during the extrapolation of gold in the process, toxins trucked in, traffic pollution, noise pollution.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Ursula Flint

Name: Ursula Flint
Address: 17868 Silver Pine Dr.
Penn Valley, CA 95946
Phone number: 415-251-7868
Email: imvf@verizon.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022

FORM LETTER B 330: URSULA FLINT

Response to Comment B 330-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding concerns about water consumption, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 331

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 2-10-22

RECEIVED
FEB 14 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Keep our ENVIRONMENT healthy!

B 331-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Vickie Tobey Fred Slikkee

Address: 167 Bourbon Hill Rd Nevada City, Ca 95959

Phone number:

Email:

FORM LETTER B 331: VICKIE TOBEY AND FRED SLIKKEE

Response to Comment B 331-1

The commenter expresses general concerns regarding the noise and vibration impacts of the project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 332

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: January 28, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
water quality, noise, property value, health

RECEIVED
FEB 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

B 332-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely, Virginia Knott

Name: VIRGINIA KNOTT

Address: 506 BRIDGE ST. NEVADA CITY, CA. 95959

Phone number: 530 265 6376

Email: jgknott@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 332: VIRGINIA KNOTT

Response to Comment B 332-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 333

RECEIVED

FEB 02 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 28, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
water quality, noise, property value, health,

B 333-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Virginia Knott

Name: VIRGINIA KNOTT

Address: 506 BRIDGE ST. NEVADA CITY, CA. 95959

Phone number: 530 2656376

Email: jgknott@sbcglobal.net

FORM LETTER B 333: VIRGINIA KNOTT

Response to Comment B 333-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 334

RECEIVED
FEB 02 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: January 28, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:
water quality, noise, property value, health,

B 334-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely, Virginia Knott

Name: VIRGINIA KNOTT
Address: 506 BRIDGE ST. NEVADA CITY, CA. 95959
Phone number: 530 2656376
Email: jgknott@sbcglobal.net

FORM LETTER B 334: VIRGINIA KNOTT

Response to Comment B 334-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Form Letter B 335

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 1/20/21

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 335-1

1) Detrimental to health
2) Crushing, blasting,
3) Summer peace & quiet
4) Increased truck traffic

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Mark Arnold

Address: 516 Temby St. Grass Valley

Phone number: 831 251-0262

Email:

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
JAN 29 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 335: WALT FROLOFF

Response to Comment B 335-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 336

Dist 3

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

JAN 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 1/20/21

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1) determined to health
2) crushing, blasting, waste water.
3) increased traffic
4) shattered peace + quick!

B 336-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

[signature]

Name: Walt Froloff

Address: 516 Temby St, Grass Valley

Phone number: 831 251 0202

Email:

FORM LETTER B 336: WALT FROLOFF

Response to Comment B 336-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Form Letter B 337

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 12 FEBRUARY 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

THE MANY CONSCIENTIOUS AND INTELLIGENT REASONS FOR NOT PERMITTING THE REOPENING OF LARGE SCALE MINING SHOULD BE SELF EVIDENT. IF CREATING NEW JOBS IS AN ISSUE, LET THE SOLUTIONS COME FROM EARTH REGENERATIVE CONCERNS, RATHER THAN RAPE, PLUNDER & GREED. LESSONS UNLEARNED WILL BE REPEATED; THIS IS NOT A SACRIFICE, WE AS LOCALS, NEED TO EXPERIENCE . . . AGAIN.

B 337-1

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: WILLIAM ALBIN

Address: 965 AMBER LOOP, GRASS VALLEY, CA 95945

Phone number: 530-802-3461

Email: wlamgr@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 16 2022
NEVADA COUNTY
PLANNING DEPARTMENT

FORM LETTER B 337: WILLIAM ALBIN

Response to Comment B 337-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 338



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date:

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

pumping millions of cubic feet of ground water dangers residential wells. Especially in drought times

The mine will pollute our air and increase lung disease. Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S. Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
B 338-1 Tourism will be hurt, based on the potential damage noted above. If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: William Bulley

Address: 12415 Pine Cone Ct

Phone number: 530 269 5990

Email: SIERA.chef@hotmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 338: WILLIAM BULLEY

Response to Comment B 338-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 339

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

RECEIVED
FEB 17 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 2-16-2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

pumping millions of cubic feet of water dangers all residential wells. Especially in drought times.

The mine will pollute our air and increase lung disease.
Create toxic mining dust, including asbestos into our community
Cause serious issues to our health, environment, and property values.
Hard rock mining is the single largest source of toxic waste in the U.S.
Trucking dangerous explosives.
The Brunswick location is in the middle of family homes zoned residential.
Tons of waste rock, down Brunswick Road, with it going to the Centennial site.
Blasting full time in tunnel under over 2,500 acres of Grass Valley area.
Removal of millions of gallons of contaminated water every day, dewatering hundreds of local citizens wells.
Waste water dumped into Wolf Creek, destroying habitats. Toxic residues like mercury, cyanide, and lead with disastrous effects.
The Rise CEO has history of violations of mining and environmental laws.
Number of possible jobs added, does not justify the potential damage noted above.
Tourism will be hurt, based on the potential damage noted above.
If citizens' wells dry up, property value is gone.
The local community get minimal benefit, rather only the Rise Gold shareholder benefit.
History of Rise Gold, and its CEO show environmental violations, no trust for the company, has no history of profits in its prior ventures.

B 339-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: William Gulley

Address: 12345 Pine Cone Cir

Phone number: 530 263 5994

Email: SEA.chief@Hotmail.com

FORM LETTER B 339: WILLIAM GULLY

Response to Comment B 339-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Regarding air pollution, including toxic air contaminants such as asbestos and diesel exhaust, as well as electricity consumption, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Form Letter B 340

Dist 3

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

In addition to all this I take issue with the foolishness it represents. There are hundreds of thousands of TONS of gold setting in storage and we must not disrupt our home for the sake of adding to it.

B 340-1

I am resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Name: Wm. C Packard III

Address: 115 Union Jack St #48, G.V.

Phone number: 831-588-2738

Email: bckmpackard@sbcglobal.net

FORM LETTER B 340: WILLIAM PACKARD

Response to Comment B 340-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 341

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: Feb. 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 341-1

In addition to all this I take issue with the foolishness it represents. There are hundreds of Thousands of TONS of gold sitting in storage and we must not disrupt our Home for the sake of adding to it

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: William C. Packard III
Address: 115 Union Jack St #48, G.V
Phone number: 831-588-2738
Email: bckmpackard@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 23 2022

FORM LETTER B 341: WILLIAM PACKARD

Response to Comment B 341-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Form Letter B 342

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 3/26/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

I'm very concerned about toxic waste and potential of contaminated water leaking into our watershed. Raising my son in a community with potential of contaminated water is very concerning.

B 342-2

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Willow Hein

Address: 15505 Excelsior Ditch Camp Rd.
Nevada City CA 95959

Phone number:

Email: willowhein@gmail.com

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

FORM LETTER B 342: WILLOW HEIR

Response to Comment B 342-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 3.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding concerns about water quality and contaminated discharge into South Fork Wolf Creek, please see Master Response 35.

Form Letter B 343

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/21/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

B 343-1

1. The mine will pollute our air and increase lung disease.
2. Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
3. A working mine will damage neighborhoods with shattered peace and quiet.
4. There are many questions as to the financial stability of this company.
5. The history and business practices of Rise Gold do not inspire trust.
6. Hard Rock mining is the single largest source of toxic waste in the United States.

I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Wolfgang Jung

Address: 14008 Live Oak Lane, Grass Valley

Phone number: 530-274-1502

Email: Wjung1@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 25 2022

FORM LETTER B 343: WOLFGANG JUNG

Response to Comment B 343-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter B 344

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 2/21/22

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

1. The mine will pollute our air and increase lung disease.
2. Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
3. A working mine will damage neighborhoods with shattered peace and quiet.
4. There are many questions as to the financial stability of this company.
5. The history and business practices of Rise Gold do not inspire trust.
6. Hard Rock mining is the single largest source of toxic waste in the United States.

B 344-1 I am a Nevada County resident and see that Rise Gold Corporation lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from thousands of other residents. I hope you will be among those who will be known to have stood against the well-funded deception that Rise Gold Mine has developed.

Sincerely,

Name: Wolfgang Jung

Address: 14008 Live Oak Lane, Grass Valley

Phone number: 530-274-1502

Email: Wjung1@sbcglobal.net

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington



FORM LETTER B 344: WOLFGANG JUNG

Response to Comment B 344-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1, 2, and 3.

Regarding air pollution, including toxic air contaminants and asbestos, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization.

Form Letter C-1

From: Alan Dunn
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 6, 2022 5:26:27 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-1-1 Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Alan Dunn
alan.dnn@gmail.com
11879 Streeter Rd. Auburn, CA 95602

FORM LETTER C-1: ALAN DUNN

Response to Comment C-1-1

Please see Master Response 1.

Form Letter C-2

From: Alan Dunn
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 6, 2022 5:26:51 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-2-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Alan Dunn
alan.dnn@gmail.com
11879 Streeter Rd. Auburn, CA 95602

FORM LETTER C-2: ALAN DUNN

Response to Comment C-2-1

Please see Master Response 1.

Form Letter C-3

From: Amie Cantu
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 4, 2022 3:55:03 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-3-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Amie Cantu
amiecantu@yahoo.com
326 Mill street Grass Valley, CA 95945

FORM LETTER C-3: ANNIE CANTU

Response to Comment C-3-1

Please see Master Response 1.

Form Letter C-4

From: Amie Cantu <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 3:55 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-4-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Amie Cantu
amiecantu@yahoo.com
326 Mill street Grass Valley, CA 95945

1

FORM LETTER C-4: ANNIE CANTU

Response to Comment C-4-1

Please Master see Response 1.

Form Letter C-5

From: Amie Cantu <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 3:55 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-5-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Amie Cantu
amiecantu@yahoo.com
326 Mill street Grass Valley, CA 95945

1

FORM LETTER C-5: ANNIE CANTU

Response to Comment C-5-1

Please Master see Response 1.

Form Letter C-6

From: Austin Gee
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:45 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-6-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Austin Gee
austingee907@gmail.com
1605 Grass Valley Highway spc 55 Auburn, CA 95603 Constituent

FORM LETTER C-6: AUSTIN GEE

Response to Comment C-6-1

Please Master see Response 1.

Form Letter C-7

From: Austin Gee <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-7-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Austin Gee
austingee907@gmail.com
1605 Grass Valley Highway spc 55 Auburn, CA 95603

1

FORM LETTER C-7: AUSTIN GEE

Response to Comment C-7-1

Please Master see Response 1.

Form Letter C-8

From: Benjamin Mossman
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:34 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-8-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Benjamin Mossman
ceo@risegoldcorp.com
333 Crown Point Circle Grass Valley, CA 95945

FORM LETTER C-8: BENJAMIN MOSSMAN

Response to Comment C-8-1

Please see Master Response 1.

Form Letter C-9

From: Bob Norman
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-9-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Bob Norman
bnorman@ix.netcom.com
10389 Sunset View ct Grass Valley, CA 95949

FORM LETTER C-9: BOB NORMAN

Response to Comment C-9-1

Please see Master Response 1.

Form Letter C-10

From: Bob Norman
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-10-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Bob Norman
bnorman@ix.netcom.com
10389 Sunset View ct Grass Valley, CA 95949 Constituent

FORM LETTER C-10: BOB NORMAN

Response to Comment C-10-1

Please see Master Response 1.

Form Letter C-11

From: Bob Norman <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-11-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Bob Norman
bnorman@ix.netcom.com
10389 Sunset View ct Grass Valley, CA 95949

1

FORM LETTER C-11: BOB NORMAN

Response to Comment C-11-1

Please see Master Response 1.

Form Letter C-12

From: Bob Treadwell
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:27 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-12-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Bob Treadwell
bwellalso@gmail.com
15280 sunshine springs place Grass valley, CA 95945

FORM LETTER C-12: BOB TREADWELL

Response to Comment C-12-1

Please see Master Response 1.

Form Letter C-13

From: Bob Treadwell
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:27 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-13-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Bob Treadwell
bwellalso@gmail.com
15280 sunshine springs place Grass valley, CA 95945 Constituent

FORM LETTER C-13: BOB TREADWELL

Response to Comment C-13-1

Please see Master Response 1.

Form Letter C-14

From: Bob Treadwell <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-14-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Bob Treadwell
bwellalso@duck.com
15280 sunshine springs place Grass valley, CA 95945

1

FORM LETTER C-14: BOB TREADWELL

Response to Comment C-14-1

Please see Master Response 1.

Form Letter C-15

From: Brandon Wilkins
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 14, 2022 2:50:16 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-15-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Brandon Wilkins
bwilkins@pennvalleyfire.com
13737 Gold Country Drive Penn Valley, CA 95946

FORM LETTER C-15: BRANDON WILKINS

Response to Comment C-15-1

Please see Master Response 1.

Form Letter C-16

From: Brandon Wilkins <myvoice@oneclickpolitics.com>
Sent: Friday, January 14, 2022 2:50 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-16-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Brandon Wilkins
bwilkins@pennvalleyfire.com
13737 Gold Country Drive Penn Valley, CA 95946

1

FORM LETTER C-16: BRANDON WILKINS

Response to Comment C-16-1

Please see Master Response 1.

Form Letter C-17

From: Brian Guthrie
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:31 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-17-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Brian Guthrie
brianguthrie71@gmail.com
13645 Lake Wildwood Drive Penn Valley, CA 95946

FORM LETTER C-17: BRIAN GUTHRIE

Response to Comment C-17-1

Please see Master Response 1.

Form Letter C-18

From: Brian Guthrie
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:28 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-18-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Brian Guthrie
brianguthrie71@gmail.com
13645 Lake Wildwood Drive Penn Valley, CA 95946 Constituent

FORM LETTER C-18: BRIAN GUTHRIE

Response to Comment C-18-1

Please see Master Response 1.

Form Letter C-19

From: Brian Guthrie <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-19-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Brian Guthrie
brianguthrie71@gmail.com
13645 Lake Wildwood Drive Penn Valley, CA 95946

1

FORM LETTER C-19: BRIAN GUTHRIE

Response to Comment C-19-1

Please see Master Response 1.

Form Letter C-20

From: Caleb carpenter
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-20-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Caleb carpenter
calebskater@yahoo.com
14406 falling star Ln grass valley Grass valley, CA 95949

FORM LETTER C-20: CALEB CARPENTER

Response to Comment C-20-1

Please see Master Response 1.

Form Letter C-21

From: Caleb carpenter
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-21-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Caleb carpenter
calebskater@yahoo.com
14406 falling star Ln grass valley Grass valley, CA 95949

FORM LETTER C-21: CALEB CARPENTER

Response to Comment C-21-1

Please see Master Response 1.

Form Letter C-22

From: Caleb carpenter
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-22-1

Sincerely,
Caleb carpenter
calebskater@yahoo.com
14406 falling star Ln grass valley Grass valley, CA 95949 Constituent

FORM LETTER C-22: CALEB CARPENTER

Response to Comment C-22-1

Please see Master Response 1.

Form Letter C-23

From: Caleb carpenter <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-23-1

Sincerely,
Caleb carpenter
calebskater@yahoo.com
14406 falling star Ln grass valley Grass valley, CA 95949

1

FORM LETTER C-23: CALEB CARPENTER

Response to Comment C-23-1

Please see Master Response 1.

Form Letter C-24

From: carl e todd
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:29:13 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-24-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
carl e todd
todds29@yahoo.com
10454 Canyon Creek Ln Penn Valley, CA 95946

FORM LETTER C-24: CARL E. TODD

Response to Comment C-24-1

Please see Master Response 1.

Form Letter 25

From: carl e todd
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:29:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-25-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
carl e todd
todds29@yahoo.com
10454 Canyon Creek Ln Penn Valley, CA 95946

FORM LETTER C-25: CARL E. TODD

Response to Comment C-25-1

Please see Master Response 1.

Form Letter C-26

From: carl e todd <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 7:29 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-26-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
carl e todd
todds29@yahoo.com
10454 Canyon Creek Ln Penn Valley, CA 95946

1

FORM LETTER 26-1: CARL E. TODD

Response to Comment 26-1-1

Please see Master Response 1.

Form Letter C-27

From: Carmen Mateo
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:41 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-27-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Carmen Mateo
carmenmateo59@gmail.com
12469 pinewoods rd nevada city, CA 95959

FORM LETTER C-27: CARMEN MATEO

Response to Comment C-27-1

Please see Master Response 1.

Form Letter C-28

From: Carmen Mateo
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:42 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-28-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Carmen Mateo
carmenmateo59@gmail.com
12469 pinewoods rd nevada city, CA 95959 Constituent

FORM LETTER C-28: CARMEN MATEO

Response to Comment C-28-1

Please see Master Response 1.

Form Letter C-29

From: Carmen Mateo <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-29-1

Sincerely,
Carmen Mateo
carmenmateo59@gmail.com
12469 pinewoods rd nevada city, CA 95959

1

FORM LETTER C-29: CARMEN MATEO

Response to Comment C-29-1

Please see Master Response 1.

Form Letter C-30

From: Carolyn Voss
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-30-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Carolyn Voss
carolyn.voss@gmail.com
18260 Rock Creek Rd Nevada City, CA 95959

FORM LETTER C-30: CAROLYN VOSS

Response to Comment C-30-1

Please see Master Response 1.

Form Letter C-31

From: Carolyn Voss
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:15 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-31-1

Sincerely,
Carolyn Voss
carolyn.voss@gmail.com
18260 Rock Creek Rd Nevada City, CA 95959 Constituent

FORM LETTER C-31: CAROLYN VOSS

Response to Comment C-31-1

Please see Master Response 1.

Form Letter C-32

From: Carolyn Voss <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-32-1

Sincerely,
Carolyn Voss
carolyn.voss@gmail.com
18260 Rock Creek Rd Nevada City, CA 95959

1

FORM LETTER C-32: CAROLYN VOSS

Response to Comment C-32-1

Please see Master Response 1.

Form Letter C-33

From: Cathleen Yaksic
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-33-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Cathleen Yaksic
cathleenalyce53158@gmail.com
536 Brighton Street Grass Valley, CA 95945

FORM LETTER C-33: CATHLEEN YAKSIC

Response to Comment C-33-1

Please see Master Response 1.

Form Letter C-34

From: Cathleen Yaksic
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-34-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Cathleen Yaksic
cathleenalyce53158@gmail.com
536 Brighton Street Grass Valley, CA 95945 Constituent

FORM LETTER C-34: CATHLEEN YAKSIC

Response to Comment C-34-1

Please see Master Response 1.

Form Letter C-35

From: Cathleen Yaksic
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-35-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Cathleen Yaksic
cathleenalyce53158@gmail.com
536 Brighton Street Grass Valley, CA 95945

FORM LETTER C-35: CATHLEEN YAKSIC

Response to Comment C-35-1

Please see Master Response 1.

Form Letter C-36

From: Charleen Martin
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 15, 2022 3:35:25 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-36-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Charleen Martin
darlingchar17@gmail.com
14338 State Highway 49 Grass Valley, CA 95949-9215 Constituent
This contact information has been verified

FORM LETTER C-36: CHARLEEN MARTIN

Response to Comment C-36-1

Please see Master Response 1.

Form Letter C-37

From: Charleen Martin <myvoice@oneclickpolitics.com>
Sent: Tuesday, February 15, 2022 3:35 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-37-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Charleen Martin
darlingchar17@gmail.com
14338 State Highway 49 Grass Valley, CA 95949-9215 Constituent
This contact information has been verified

1

FORM LETTER C-37: CHARLEEN MARTIN

Response to Comment C-37-1

Please see Master Response 1.

Form Letter C-38

From: charles Vold
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:07 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-38-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
charles Vold
kandevold@suddenlink.net
15510 Bella Sera CT Grass Valley, CA 95945

FORM LETTER 38-1: CHARLES VOLD

Response to Comment 38-1-1

Please see Master Response 1.

Form Letter C-39

From: charles Vold
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:07 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-39-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
charles Vold
kandevold@suddenlink.net
15510 Bella Sera CT Grass Valley, CA 95945 Constituent

FORM LETTER C-39: CHARLES VOLD

Response to Comment C-39-1

Please see Master Response 1.

Form Letter C-40

From: Chris Frank
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:24 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-40-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Frank
chri_f2@aceweb.com
PO Box 416 Penn Valley, CA 95946

FORM LETTER C-40: CHRIS FRANK

Response to Comment C-40-1

Please see Master Response 1.

Form Letter C-41

From: Chris Frank
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:24 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-41-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Frank
chri_f2@aceweb.com
PO Box 416 Penn Valley, CA 95946 Constituent

FORM LETTER C-41: CHRIS FRANK

Response to Comment C-41-1

Please see Master Response 1.

Form Letter C-42

From: Chris Frank <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-42-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Frank
chri_f2@aceweb.com
PO Box 416 Penn Valley, CA 95946

1

FORM LETTER C-42: CHRIS FRANK

Response to Comment C-42-1

Please see Master Response 1.

Form Letter C-43

From: Chris Miller
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-43-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Miller
miller505@gmail.com
PO Box 3344 Grass Valley, CA 95945

FORM LETTER C-43: CHRIS MILLER

Response to Comment C-43-1

Please see Master Response 1.

Form Letter C-44

From: Chris Miller
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:20 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-44-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Miller
miller505@gmail.com
PO Box 3344 Grass Valley, CA 95945 Constituent

FORM LETTER C-44: CHRIS MILLER

Response to Comment C-44-1

Please see Master Response 1.

Form Letter C-45

From: Chris Miller <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-45-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chris Miller
miller505@gmail.com
PO Box 3344 Grass Valley, CA 95945

1

FORM LETTER 45: CHRIS MILLER

Response to Comment C-45-1

Please see Master Response 1.

Form Letter C-46

From: Christopher Reilly
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:26 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-46-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Christopher Reilly
castle55@yahoo.com
16604 Joey Court Grass Valley, CA 95949

FORM LETTER C-46: CHRISTOPHER REILLY

Response to Comment C-46-1

Please see Master Response 1.

Form Letter C-47

From: Christopher Reilly
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:27 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-47-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Christopher Reilly
castle55@yahoo.com
16604 Joey Court Grass Valley, CA 95949 Constituent

FORM LETTER C-47: CHRISTOPHER REILLY

Response to Comment C-47-1

Please see Master Response 1.

Form Letter C-48

From: Christopher Reilly <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-48-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Christopher Reilly
castle55@yahoo.com
16604 Joey Court Grass Valley, CA 95949

1

FORM LETTER C-48: CHRISTOPHER REILLY

Response to Comment C-48-1

Please see Master Response 1.

Form Letter C-49

From: Chuck Treadwell
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:30 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-49-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chuck Treadwell
bwellalso@icloud.com
P.O.box 633 Chicago park, CA 95712 Constituent

FORM LETTER C-49: CHUCK TREADWELL

Response to Comment C-49-1

Please see Master Response 1.

Form Letter C-50

From: Chuck Treadwell <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-50-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Chuck Treadwell
bwellalso@icloud.com
P.O.box 633 Chicago park, CA 95712

1

FORM LETTER C-50: CHUCK TREADWELL

Response to Comment C-50-1

Please see Master Response 1.

Form Letter C-51

From: cindi anderson
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 26, 2022 9:09:10 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-51-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
cindi anderson
cindi69anderson@yahoo.com
11812 polaris drive grass valley, CA 95949

FORM LETTER C-51: CINDI ANDERSON

Response to Comment C-51-1

Please see Master Response 1.

Form Letter C-52

From: cindi anderson <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 26, 2022 9:09 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-52-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
cindi anderson
cindi69anderson@yahoo.com
11812 polaris drive grass valley, CA 95949

1

FORM LETTER C-52: CINDI ANDERSON

Response to Comment C-52-1

Please see Master Response 1.

Form Letter C-53

From: Clark Pearson
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:42 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-53-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Clark Pearson
lostsierraclark@gmail.com
15329 Little Valley Rd. #33 Grass Valley, CA 95949

FORM LETTER C-53: CLARK PEARSON

Response to Comment C-53-1

Please see Master Response 1.

Form Letter C-54

From: Clark Pearson
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:42 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-54-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Clark Pearson
lostsierraclark@gmail.com
15329 Little Valley Rd. #33 Grass Valley, CA 95949

FORM LETTER C-54: CLARK PEARSON

Response to Comment C-54-1

Please see Master Response 1.

Form Letter C-55

From: Clark Pearson <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-55-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Clark Pearson
lostsierraclark@gmail.com
15329 Little Valley Rd. #33 Grass Valley, CA 95949 Constituent

1

FORM LETTER C-55: CLARK PEARSON

Response to Comment C-55-1

Please see Master Response 1.

Form Letter C-56

From: Clyde E King
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:02 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-56-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Clyde E King
ceklasd@earthlink.net
19578 Last Mile Drive Chicago Park, CA 95712

FORM LETTER C-56: CLYDE E. KING

Response to Comment C-56-1

Please see Master Response 1.

Form Letter C-57

From: Clyde E King
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:02 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-57-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Clyde E King
ceklasd@earthlink.net
19578 Last Mile Drive Chicago Park, CA 95712 Constituent

FORM LETTER C-57: CLYDE E. KING

Response to Comment C-57-1

Please see Master Response 1.

From: Clyde E King <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho Maryland Mine

Form Letter C-58

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-58-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Clyde E King
ceklasd@earthlink.net
19578 Last Mile Drive Chicago Park, CA 95712

1

FORM LETTER C-58: CLYDE E. KING

Response to Comment C-58-1

Please see Master Response 1.

Form Letter C-59

From: Dale Bohnenberger
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:49 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-59-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Bohnenberger
no.1engineer@live.com
10067 Golden Polaris place Grass valley, CA 95949

FORM LETTER C-59: DALE BOHNENBERGER

Response to Comment C-59-1

Please see Master Response 1.

Form Letter C-60

From: Dale Bohnenberger
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:48 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-60-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Bohnenberger
no.1engineer@live.com
10067 Golden Polaris place Grass valley, CA 95949 Constituent

FORM LETTER C-60: DALE BOHNENBERGER

Response to Comment C-60-1

Please see Master Response 1.

Form Letter C-61

From: Dale Bohnenberger <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-61-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Bohnenberger
no.1engineer@live.com
10067 Golden Polaris place Grass valley, CA 95949

1

FORM LETTER C-61: DALE BOHNENBERGER

Response to Comment C-61-1

Please see Master Response 1.

Form Letter C-62

From: Dale Hafelfinger
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:11 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-62-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Hafelfinger
sixofhearts2020@gmail.com
18707 Three Homes Rd Grass Valley, CA 95949

FORM LETTER C-62: DALE HAFELFINGER

Response to Comment C-62-1

Please see Master Response 1.

Form Letter C-63

From: Dale Hafelfinger
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-63-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Hafelfinger
sixofhearts2020@gmail.com
18707 Three Homes Rd Grass Valley, CA 95949 Constituent

FORM LETTER C-63: DALE HAFELFINGER

Response to Comment C-63-1

Please see Master Response 1.

Form Letter C-64

From: Dale Hafelfinger <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-64-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dale Hafelfinger
sixofhearts2020@gmail.com
18707 Three Homes Rd Grass Valley, CA 95949

1

FORM LETTER C-64: DALE HAFELFINGER

Response to Comment C-64-1

Please see Master Response 1.

Form Letter C-65

From: Daniel Danckert
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 14, 2022 12:18:11 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-65-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Daniel Danckert
ddanckert@hotmail.com
19740 Matthew Road Grass Valley, CA 95949

FORM LETTER C-65: DANIEL DANCKERT

Response to Comment C-65-1

Please see Master Response 1.

Form Letter C-66

From: Daniel Danckert <myvoice@oneclickpolitics.com>
Sent: Friday, January 14, 2022 12:18 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-66-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Daniel Danckert
ddanckert@hotmail.com
19740 Matthew Road Grass Valley, CA 95949

1

FORM LETTER C-66: DANIEL DANCKERT

Response to Comment C-66-1

Please see Master Response 1.

Form Letter C-67

From: Darla Draper
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:36 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-67-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945

FORM LETTER C-67: DARLA DRAPER

Response to Comment C-67-1

Please see Master Response 1.

Form Letter C-68

From: Darla Draper
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:34 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-68-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945

FORM LETTER C-68: DARLA DRAPER

Response to Comment C-68-1

Please see Master Response 1.

Form Letter C-69

From: Darla Draper
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 5, 2022 8:12:04 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-69-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945

FORM LETTER C-69: DARLA DRAPER

Response to Comment C-69-1

Please see Master Response 1.

Form Letter C-70

From: Darla Draper <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 5, 2022 8:12 AM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-70-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945

1

FORM LETTER C-70: DARLA DRAPER

Response to Comment C-70-1

Please see Master Response 1.

Form Letter C-71

From: Darla Draper <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-71-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945 Constituent

1

FORM LETTER C-71: DARLA DRAPER

Response to Comment C-71-1

Please see Master Response 1.

Form Letter C-72

From: Darla Draper <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 5, 2022 8:12 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-72-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Darla Draper
kenndarr0461@att.net
213 Gold Point Ct. Grass Valley, CA 95945

1

FORM LETTER C-72: DARLA DRAPER

Response to Comment C-72-1

Please see Master Response 1.

Form Letter C-73

From: Darryl B Snow
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:38 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-73-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Darryl B Snow
darryl_snow@hotmail.com
14278 La Noria Court Grass Valley, CA 95945

FORM LETTER C-73: DARRYL B. SNOW

Response to Comment C-73-1

Please see Master Response 1.

Form Letter C-74

From: Darryl B Snow
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:41 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-74-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Darryl B Snow
darryl_snow@hotmail.com
14278 La Noria Court Grass Valley, CA 95945 Constituent

FORM LETTER C-74: DARRYL B. SNOW

Response to Comment C-74-1

Please see Master Response 1.

Form Letter C-75

From: Darryl B Snow <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-75-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Darryl B Snow
darryl_snow@hotmail.com
14278 La Noria Court Grass Valley, CA 95945

1

FORM LETTER C-75: DARRYL B. SNOW

Response to Comment C-75-1

Please see Master Response 1.

Form Letter C-76

From: Dawn Fredricks <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-76-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Dawn Fredricks
dawnmfredricks@msn.com
12450 SW Fischer Rd Unit 222 Tigard, OR 97224

1

FORM LETTER C-76: DAWN FREDRICKS

Response to Comment C-76-1

Please see Master Response 1.

Form Letter C-77

From: Dawn Fredricks
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:52 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-77-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Dawn Fredricks
dawnmfredricks@msn.com
12450 SW Fischer Rd Unit 222 Tigard, OR 97224

FORM LETTER C-77: DAWN FREDRICKS

Response to Comment C-77-1

Please see Master Response 1.

Form Letter C-78

From: DENNIS WESSELS
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:20 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-78-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
DENNIS WESSELS
dwessels43@gmail.com
841 OLD TUNNEL RD,, 26 Grass Valley, CA 95945

FORM LETTER C-78: DENNIS WESSELS

Response to Comment C-78-1

Please see Master Response 1.

Form Letter C-79

From: DENNIS WESSELS
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:19 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-79-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
DENNIS WESSELS
dwessels43@gmail.com
841 OLD TUNNEL RD,, 26 Grass Valley, CA 95945 Constituent

FORM LETTER C-79: DENNIS WESSELS

Response to Comment C-79-1

Please see Master Response 1.

Form Letter C-80

From: DENNIS WESSELS <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-80-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
DENNIS WESSELS
dwessels43@gmail.com
841 OLD TUNNEL RD,, 26 Grass Valley, CA 95945

1

FORM LETTER C-80: DENNIS WESSELS

Response to Comment C-80-1

Please see Master Response 1.

Form Letter C-81

From: Donna G Clark-Salmonson
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:46 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-81-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Donna G Clark-Salmonson
virago@nccn.net
15053 Arrowhead Lane Grass Valley, CA 95945

FORM LETTER C-81: DONNA G. CLARK-SALMONSON

Response to Comment C-81-1

Please see Master Response 1.

Form Letter C-82

From: Donna G Clark-Salmonson
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:47 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-82-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Donna G Clark-Salmonson
virago@nccn.net
15053 Arrowhead Lane Grass Valley, CA 95945 Constituent

FORM LETTER C-82: DONNA G. CLARK-SALMONSON

Response to Comment C-82-1

Please see Master Response 1.

Form Letter C-83

From: Donna G Clark-Salmonson <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-83-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Donna G Clark-Salmonson
virago@nccn.net
15053 Arrowhead Lane Grass Valley, CA 95945

1

FORM LETTER C-83: DONNA G. CLARK-SALMONSON

Response to Comment C-83-1

Please see Master Response 1.

Form Letter C-84

From: Donna Treadwell
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 13, 2022 6:06:39 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-84-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Donna Treadwell
2donnamama@gmail.com
15280 sunshine springs place Grass valley, CA 95945

FORM LETTER C-84: DONNA TREADWELL

Response to Comment C-84-1

Please see Master Response 1.

Form Letter C-85

From: Donna Treadwell
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 13, 2022 6:06:24 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-85-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Donna Treadwell
2donnamama@gmail.com
15280 sunshine springs place Grass valley, CA 95945

FORM LETTER C-85: DONNA TREADWELL

Response to Comment C-85-1

Please see Master Response 1.

Form Letter C-86

From: Donna Treadwell <myvoice@oneclickpolitics.com>
Sent: Thursday, January 13, 2022 6:06 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-86-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Donna Treadwell
2donnamama@gmail.com
15280 sunshine springs place Grass valley, CA 95945

1

FORM LETTER C-86: DONNA TREADWELL

Response to Comment C-86-1

Please see Master Response 1.

Form Letter C-87

From: Douglas Miller
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:36 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-87-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood Ln Grass Valley, CA 95945

FORM LETTER C-87: DOUGLAS MILLER

Response to Comment C-87-1

Please see Master Response 1.

Form Letter C-88

From: Douglas Miller
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:35 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-88-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood Ln Grass Valley, CA 95945

FORM LETTER C-88: DOUGLAS MILLER

Response to Comment C-88-1

Please see Master Response 1.

Form Letter C-89

From: Matt Kelley
To: Idaho MMEIR
Subject: FW: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 4, 2022 3:31:10 PM

From: Douglas Miller <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 2:58 PM
To: Matt Kelley <Matt.Kelley@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-89-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood lane Grass Valley, CA 95945

FORM LETTER C-89: DOUGLASS MILLER

Response to Comment C-89-1

Please see Master Response 1.

Form Letter C-90

From: Douglas Miller <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 2:58 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-90-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood lane Grass Valley, CA 95945

1

FORM LETTER C-90: DOUGLAS MILLER

Response to Comment C-90-1

Please see Master Response 1.

Form Letter C-91

From: Douglas Miller <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-91-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood Ln Grass Valley, CA 95945 Constituent

1

FORM LETTER C-91: DOUGLAS MILLER

Response to Comment C-91-1

Please see Master Response 1.

From: Douglas Miller <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 2:58 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-92

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-92-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Douglas Miller
dougmiller25@gmail.com
15811 Lakewood lane Grass Valley, CA 95945

1

FORM LETTER C-92: DOUGLAS MILLER

Response to Comment C-92-1

Please see Master Response 1.

Form Letter C-93

From: Earnie Smith
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-93-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Earnie Smith
Boskosmith02@gmail.com
12603 Shady Creek Dr Nevada City, CA 95959

FORM LETTER C-93: EARNIE SMITH

Response to Comment C-93-1

Please see Master Response 1.

Form Letter C-94

From: Earnie Smith
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:13 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-94-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Earnie Smith
Boskosmith02@gmail.com
12603 Shady Creek Dr Nevada City, CA 95959 Constituent

FORM LETTER C-94: EARNIE SMITH

Response to Comment C-94-1

Please see Master Response 1.

Form Letter C-95

From: Earnie Smith <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-95-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Earnie Smith
Boskosmith02@gmail.com
12603 Shady Creek Dr Nevada City, CA 95959

1

FORM LETTER C-95: EARNIE SMITH

Response to Comment C-95-1

Please see Master Response 1.

Form Letter C-96

From: Edward Strange
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 5:51:34 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-96-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Edward Strange
ca_bear70@comcast.net
12125 PITCAIRN LN NEVADA CITY, CA 95959

FORM LETTER C-96: EDWARD STRANGE

Response to Comment C-96-1

Please see Master Response 1.

From: Edward Strange <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 5:51 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-97

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-97-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Edward Strange
ca_bear70@comcast.net
12125 PITCAIRN LN NEVADA CITY, CA 95959

1

FORM LETTER C-97: EDWARD STRANGE

Response to Comment C-97-1

Please see Master Response 1.

Form Letter C-98

From: Edward Strange <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 5:52 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-98-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Edward Strange
ca_bear70@comcast.net
12125 PITCAIRN LN NEVADA CITY, CA 95959

1

FORM LETTER C-98: EDWARD STRANGE

Response to Comment C-98-1

Please see Master Response 1.

Form Letter C-99

From: Elvis Cantu
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:07 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-99-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill St Grass Valley, CA 95945

FORM LETTER C-99: ELVIS CANTU

Response to Comment C-99-1

Please see Master Response 1.

Form Letter C-100

From: Elvis Cantu
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:06 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-100-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill St Grass Valley, CA 95945

FORM LETTER C-100: ELVIS CANTU

Response to Comment C-100-1

Please see Master Response 1.

Form Letter C-101

From: Elvis Cantu
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 4, 2022 10:57:40 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-101-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill Street Grass Valley, CA 95945

FORM LETTER C-101: ELVIS CANTU

Response to Comment C-101-1

Please see Master Response 1.

Form Letter C-102

From: Elvis Cantu <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 10:57 AM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-102-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill Street Grass Valley, CA 95945

1

FORM LETTER C-102: ELVIS CANTU

Response to Comment C-102-1

Please see Master Response 1.

Form Letter C-103

From: Elvis Cantu <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 10:57 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-103-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill Street Grass Valley, CA 95945

1

FORM LETTER C-103: ELVIS CANTU

Response to Comment C-103-1

Please see Master Response 1.

Form Letter C-104

From: Elvis Cantu <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-104-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Elvis Cantu
elviscantu@yahoo.com
326 Mill St Grass Valley, CA 95945 Constituent

FORM LETTER C-104: ELVIS CANTU

Response to Comment C-104-1

Please see Master Response 1.

Form Letter C-105

From: Emily forman
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:40 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-105-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Emily forman
egirschi@yahoo.com
12122 Old Wood Road Nevada City, CA 95959

FORM LETTER C-105: EMILY FORMAN

Response to Comment C-105-1

Please see Master Response 1.

Form Letter C-106

From: Emily forman
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:41 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-106-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Emily forman
egirschi@yahoo.com
12122 Old Wood Road Nevada City, CA 95959 Constituent

FORM LETTER C-106: EMILY FORMAN

Response to Comment C-106-1

Please see Master Response 1.

Form Letter C-107

From: Emily forman <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-107-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Emily forman
egirschi@yahoo.com
12122 Old Wood Road Nevada City, CA 95959

FORM LETTER C-107: EMILY FORMAN

Response to Comment C-107-1

Please see Master Response 1.

Form Letter C-108

From: Erin Beatie
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:03 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-108-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Erin Beatie
brightinglighting@hotmail.com
10386 Sunset View Ct Grass Valley, CA 95949-9039

FORM LETTER C-108: ERIN BEATIE

Response to Comment C-108-1

Please see Master Response 1.

Form Letter C-109

From: Erin Beatie
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:03 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-109-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Erin Beatie
brightinglighting@hotmail.com
10386 Sunset View Ct Grass Valley, CA 95949-9039 Constituent

FORM LETTER C-109: ERIN BEATIE

Response to Comment C-109-1

Please see Master Response 1.

Form Letter C-110

From: Erin Beatie <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-110-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Erin Beatie
brightinglighting@hotmail.com
10386 Sunset View Ct Grass Valley, CA 95949-9039

1

FORM LETTER C-110: ERIN BEATIE

Response to Comment C-110-1

Please see Master Response 1.

Form Letter C-111

From: Erin E Dunne
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:47 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-111-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Erin E Dunne
erin.dunne2@gmail.com
10706 SW 82 Ave Portland, OR 97223

FORM LETTER C-111: ERIN E. DUNNE

Response to Comment C-111-1

Please see Master Response 1.

Form Letter C-112

From: Erin E Dunne <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-112-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Erin E Dunne
erin.dunne2@gmail.com
10706 SW 82 Ave Portland, OR 97223

1

FORM LETTER C-112: ERIN E. DUNNE

Response to Comment C-112-1

Please see Master Response 1.

Form Letter C-113

From: Erin E Dunne <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:26 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-113-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Erin E Dunne
erin.dunne2@gmail.com
10706 SW 82 Ave Portland, OR 97223

1

FORM LETTER C-113: ERIN E. DUNNE

Response to Comment C-113-1

Please see Master Response 1.

Form Letter C-114

From: Erin E Dunne <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-114-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Erin E Dunne
erin.dunne2@gmail.com
10706 SW 82 Ave Portland, OR 97223

1

FORM LETTER C-114: ERIN E. DUNNE

Response to Comment C-114-1

Please see Master Response 1.

From: fredrick c myers <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:26 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-115

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-115-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
fredrick c myers
baronia@earthlink.net
17598 Alexandra Way Grass Valley, CA 95949-7182

1

FORM LETTER C-115: FREDRICK C. MYERS

Response to Comment C-115-1

Please see Master Response 1.

Form Letter C-116

From: fredrick c myers
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:33 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-116-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
fredrick c myers
baronia@earthlink.net
17598 Alexandra Way Grass Valley, CA 95949-7182

FORM LETTER C-116: FREDRICK C. MYERS

Response to Comment C-116-1

Please see Master Response 1.

Form Letter C-117

From: fredrick c myers
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:35 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-117-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
fredrick c myers
baronia@earthlink.net
17598 Alexandra Way Grass Valley, CA 95949-7182 Constituent

FORM LETTER C-117: FREDRICK C. MYERS

Response to Comment C-117-1

Please see Master Response 1.

Form Letter C-118

From: Gary Benedict
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:02:56 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-118-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gary Benedict
garybenedict@outlook.com
17385 Lake Vera Purdon Rd Nevada City, CA 95959

FORM LETTER C-118: GARY BENEDICT

Response to Comment C-118-1

Please see Master Response 1.

Form Letter C-119

From: Gary Benedict
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:03:01 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-119-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Gary Benedict
garybenedict@outlook.com
17385 Lake Vera Purdon Rd Nevada City, CA 95959

FORM LETTER C-119: GARY BENEDICT

Response to Comment C-119-1

Please see Master Response 1.

Form Letter C-120

From: Gary Benedict <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 6:03 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-120-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gary Benedict
garybenedict@outlook.com
17385 Lake Vera Purdon Rd Nevada City, CA 95959

1

FORM LETTER C-120: GARY BENEDICT

Response to Comment C-120-1

Please see Master Response 1.

Form Letter C-121

From: Gene Adams
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:09 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-121-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gene Adams
20geneadams@gmail.com
17021 Retrac Way Grass Valley, CA 95949

FORM LETTER C-121: GENE ADAMS

Response to Comment C-121-1

Please see Master Response 1.

Form Letter C-122

From: Gene Adams
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:09 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-122-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gene Adams
20geneadams@gmail.com
17021 Retrac Way Grass Valley, CA 95949 Constituent

FORM LETTER C-122: GENE ADAMS

Response to Comment C-122-1

Please see Master Response 1.

Form Letter C-123

From: Gene Adams <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-123-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Gene Adams
20geneadams@gmail.com
17021 Retrac Way Grass Valley, CA 95949

1

FORM LETTER C-123: GENE ADAMS

Response to Comment C-123-1

Please see Master Response 1.

Form Letter C-124

From: Gerald Gierszewski
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:36:14 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-124-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gerald Gierszewski
rnrfire26@comcast.net
P.O. Box 607 Rough and Ready, CA 95975

FORM LETTER C-124: GERALD GIERSZEWSKI

Response to Comment C-124-1

Please see Master Response 1.

Form Letter C-125

From: Gerald Gierszewski
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:55 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-125-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gerald Gierszewski
rnrfire26@comcast.net
P.O. Box 607 Rough and Ready, CA 95975

FORM LETTER C-125: GERALD GIERSZEWSKI

Response to Comment C-125-1

Please see Master Response 1.

Form Letter C-126

From: Gerald Gierszewski
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:56 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-126-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gerald Gierszewski
rnrfire26@comcast.net
P.O. Box 607 Rough and Ready, CA 95975

FORM LETTER C-126: GERALD GIERSZEWSKI

Response to Comment C-126-1

Please see Master Response 1.

Form Letter C-127

From: Gerald Gierszewski
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:36:15 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-127-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gerald Gierszewski
rnrfire26@comcast.net
P.O. Box 607 Rough and Ready, CA 95975

FORM LETTER C-127: GERALD GIERSZEWSKI

Response to Comment C-127-1

Please see Master Response 1.

Form Letter C-128

From: Gerald Gierszewski <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:36 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-128-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Gerald Gierszewski
rnrfire26@vomcast.net
P.O. Box 607 Rough and Ready, CA 95975

1

FORM LETTER C-128: GERALD GIERSZEWSKI

Response to Comment C-128-1

Please see Master Response 1.

Form Letter C-129

From: Gerald Gierszewski <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-129-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Gerald Gierszewski
rnrfire26@vomcast.net
P.O. Box 607 Rough and Ready, CA 95975 Constituent

1

FORM LETTER C-129: GERALD GIERSZEWSKI

Response to Comment C-129-1

Please see Master Response 1.

Form Letter C-130

From: Grady WILSON
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:34 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

C-130-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Grady WILSON
seekerforau@yahoo.com
332 Horizon Circle Grass Valley, CA 95945

FORM LETTER C-130: GRADY WILSON

Response to Comment C-130-1

Please see Master Response 1.

Form Letter C-131

From: Grady WILSON
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:34 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-131-1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Grady WILSON
seekerforau@yahoo.com
332 Horizon Circle Grass Valley, CA 95945 Constituent

FORM LETTER C-131: GRADY WILSON

Response to Comment C-131-1

Please see Master Response 1.

Form Letter C-132

From: Grady WILSON <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-132-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Grady WILSON
seekerforau@yahoo.com
332 Horizon Circle Grass Valley, CA 95945

1

FORM LETTER C-132: GRADY WILSON

Response to Comment C-132-1

Please see Master Response 1.

Form Letter C-133

From: Greg Schimke
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, February 17, 2022 6:08:00 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-133-1 Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Greg Schimke
gregschimke@live.com
10642 Willow Valley Road Nevada City, CA 95959 Constituent
This contact information has been verified

FORM LETTER C-133: GREG SCHIMKE

Response to Comment C-133-1

Please see Master Response 1.

From: Greg Schimke <myvoice@oneclickpolitics.com>
Sent: Thursday, February 17, 2022 6:08 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-134

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-134-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Greg Schimke
gregschimke@live.com
10642 Willow Valley Road Nevada City, CA 95959 Constituent
This contact information has been verified

1

FORM LETTER C-134: GREG SCHIMKE

Response to Comment C-134-1

Please see Master Response 1.

Form Letter C-135

From: Harrison E Shrader
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Monday, March 7, 2022 10:14:45 AM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

C-135-1 Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Harrison E Shrader
shraderharrison65@gmail.com
21015 Clivus dr Grass Valley, CA 95949 Constituent
This contact information has been verified

FORM LETTER C-135: HARRISON E. SHRADER

Response to Comment C-135-1

Please see Master Response 1.

Form Letter C-136

From: Harrison E Shrader
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Monday, March 7, 2022 10:14:43 AM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-136-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Harrison E Shrader
shraderharrison65@gmail.com
21015 Clivus dr Grass Valley, CA 95949 Constituent
This contact information has been verified

FORM LETTER C-136: HARRISON E. SHRADER

Response to Comment C-136-1

Please see Master Response 1.

Form Letter C-137

From: Herb Miller
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 19, 2022 8:53:54 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-137-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Herb Miller
miller@jps.net
13520 Tranquility ln Nevada City, CA 95959

FORM LETTER C-137: HERB MILLER

Response to Comment C-137-1

Please see Master Response 1.

Form Letter C-138

From: Herb Miller
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 19, 2022 8:53:53 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-138-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Herb Miller
miller@jps.net
13520 Tranquility ln Nevada City, CA 95959

FORM LETTER C-138: HERB MILLER

Response to Comment C-138-1

Please see Master Response 1.

Form Letter C-139

From: Herb Miller <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 19, 2022 8:54 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-139-1

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Sincerely,
Herb Miller
miller@jps.net
13520 Tranquility In Nevada City, CA 95959

FORM LETTER C-139: HERB MILLER

Response to Comment C-139-1

Please see Master Response 1.

Form Letter C-140

From: Erin E Dunne
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:47 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-140-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Erin E Dunne
erin.dunne2@gmail.com
10706 SW 82 Ave Portland, OR 97223

FORM LETTER C-140: ERIN E. DUNNE

Response to Comment C-140-1

Please see Master Response 1.

Form Letter C-141

From: Holly Rose
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:18 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-141-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Holly Rose
hbeerose@yahoo.com
2036 Nevada City Hwy., #420 Grass Valley, CA 95945 Constituent

FORM LETTER C-141: HOLLY ROSE

Response to Comment C-141-1

Please see Master Response 1.

Form Letter C-142

From: Holly Rose
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:18 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-142-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Holly Rose
hbeerose@yahoo.com
2036 Nevada City Hwy., #420 Grass Valley, CA 95945

FORM LETTER C-142: HOLLY ROSE

Response to Comment C-142-1

Please see Master Response 1.

Form Letter C-143

From: Holly Rose
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:08 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-143-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Holly Rose
hbeerose@yahoo.com
2036 Nevada City Hwy., #420 Grass Valley, CA 95945

FORM LETTER C-143: HOLLY ROSE

Response to Comment C-143-1

Please see Master Response 1.

Form Letter C-144

From: Holly Rose <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-144-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Holly Rose
hbeerose@yahoo.com
2036 Nevada City Hwy., #420 Grass Valley, CA 95945

FORM LETTER C-144: HOLLY ROSE

Response to Comment C-144-1

Please see Master Response 1.

Form Letter C-145

From: Hope Rodriguez
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:03 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-145-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Hope Rodriguez
hope.rodriguez80@yahoo.com
10656 oak st Grass valley, CA 95945

FORM LETTER C-145: HOPE RODRIGUEZ

Response to Comment C-145-1

Please see Master Response 1.

Form Letter C-146

From: Hope Rodriguez
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:04 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-146-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Hope Rodriguez
hope.rodriguez80@yahoo.com
10656 oak st Grass valley, CA 95945 Constituent

FORM LETTER C-146: HOPE RODRIGUEZ

Response to Comment C-146-1

Please see Master Response 1.

Form Letter C-147

From: Hope Rodriguez <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-147-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Sincerely,
Hope Rodriguez
hope.rodriguez80@yahoo.com
10656 oak st Grass valley, CA 95945

FORM LETTER C-147: HOPE RODRIGUEZ

Response to Comment C-147-1

Please see Master Response 1.

Form Letter C-148

From: Jacob Carcerano <myvoice@oneclickpolitics.com>
Sent: Monday, March 21, 2022 11:13 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-148-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jacob Carcerano
jacobcarcerano@gmail.com
11640 alta vista ave Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-148: JACOB CARCERANO

Response to Comment C-148-1

Please see Master Response 1.

Form Letter C-149

From: Jacob Carcerano <myvoice@oneclickpolitics.com>
Sent: Monday, March 21, 2022 11:13 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-149-1

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Sincerely,
Jacob Carcerano
jacobcarcerano@gmail.com
11640 alta vista ave Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-149: JACOB CARCERANO

Response to Comment C-149-1

Please see Master Response 1.

Form Letter C-150

From: James Geach
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 8:56:05 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-150-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
James Geach
jimgeach49@yahoo.com
11620 Via Vista Nevada City, CA 95959

FORM LETTER C-150: JAMES GEACH

Response to Comment C-150-1

Please see Master Response 1.

Form Letter C-151

From: James Geach
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 8:56:06 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-151-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
James Geach
jimgeach49@yahoo.com
11620 Via Vista Nevada City, CA 95959

FORM LETTER C-151: JAMES GEACH

Response to Comment C-151-1

Please see Master Response 1.

Form Letter C-152

From: James Geach <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 8:56 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-152-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
James Geach
jimgeach49@yahoo.com
11620 Via Vista Nevada City, CA 95959

1

FORM LETTER C-152: JAMES GEACH

Response to Comment C-152-1

Please see Master Response 1.

Form Letter C-153

From: James Self
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:58 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-153-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
James Self
jim.self1951@gmail.com
11580 Mirror Lake Court Grass Valley, CA 95945

FORM LETTER C-153: JAMES SELF

Response to Comment C-153-1

Please see Master Response 1.

Form Letter C-154

From: James Self
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:59 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-154-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
James Self
jim.self1951@gmail.com
11580 Mirror Lake Court Grass Valley, CA 95945 Constituent

FORM LETTER C-154 JAMES SELF

Response to Comment C-154-1

Please see Master Response 1.

Form Letter C-155

From: James Self
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:59 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-155-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
James Self
jim.self1951@gmail.com
11580 Mirror Lake Court Grass Valley, CA 95945

FORM LETTER C-155: JAMES SELF

Response to Comment C-155-1

Please see Master Response 1.

Form Letter C-156

From: jan holmgren <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-156-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
jan holmgren
janholmgren@charter.net
941 JUANITA WAY CENTRAL POINT, OR 97502

1

FORM LETTER C-156: JAN HOLMGREN

Response to Comment C-156-1

Please see Master Response 1.

Form Letter C-157

From: jan holmgren
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:52 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-157-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
jan holmgren
janholmgren@charter.net
941 JUANITA WAY CENTRAL POINT, OR 97502

FORM LETTER C-157: JAN HOLMGREN

Response to Comment C-157-1

Please see Master Response 1.

Form Letter C-158

From: Jarryd Gonzales
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 15, 2022 7:59:23 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-158-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jarryd Gonzales
jarrydgonzales@yahoo.com
17011 Beach blvd. #900 Huntington Beach, CA 92647 Constituent
This contact information has been verified

FORM LETTER C-158: JARRYD GONZALES

Response to Comment C-158-1

Please see Master Response 1.

From: Jarryd Gonzales <myvoice@oneclickpolitics.com>
Sent: Tuesday, February 15, 2022 7:59 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-159

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

C-159-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jarryd Gonzales
jarrydgonzales@yahoo.com
17011 Beach blvd. #900 Huntington Beach, CA 92647 Constituent
This contact information has been verified

1

FORM LETTER C-159: JARRYD GONZALES

Response to Comment C-159-1

Please see Master Response 1.

Form Letter C-160

From: Jason Condon <myvoice@oneclickpolitics.com>
Sent: Friday, March 25, 2022 11:14 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-160-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jason Condon
jnodnoc@yahoo.com
231 Depot st. #4 GRASS VALLEY, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-160: JASON CONDON

Response to Comment C-160-1

Please see Master Response 1.

From: Jason Condon <myvoice@oneclickpolitics.com>
Sent: Friday, March 25, 2022 11:14 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-161

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-161-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jason Condon
jnodnoc@yahoo.com
231 Depot st. #4 GRASS VALLEY, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-161: JASON CONDON

Response to Comment C-161-1

Please see Master Response 1.

Form Letter C-162

From: Jedd Caddy
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:42:22 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-162-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jedd Caddy
jcaddy@hotmail.com
405 Washington St Grass Valley, CA 95945

FORM LETTER C-162: JEDD CADDY

Response to Comment C-162-1

Please see Master Response 1.

Form Letter C-163

From: Jedd Caddy
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:42:14 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-163-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jedd Caddy
jcaddy@hotmail.com
405 Washington St Grass Valley, CA 95945

FORM LETTER C-163: JEDD CADDY

Response to Comment C-163-1

Please see Master Response 1.

Form Letter C-164

From: Jedd Caddy <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:42 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-164-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jedd Caddy
jcaddy@hotmail.com
405 Washington St Grass Valley, CA 95945

1

FORM LETTER C-164: JEDD CADDY

Response to Comment C-164-1

Please see Master Response 1.

From: Jeffrey Kyle <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-165

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-165-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jeffrey Kyle
jdkj64@yahoo.com
16676 Sharon Way Grass Valley, CA 95949

1

FORM LETTER C-165: JEFFREY KYLE

Response to Comment C-165-1

Please see Master Response 1.

Form Letter C-166

From: Jeffrey Kyle
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:03 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-166-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jeffrey Kyle
jdkj64@yahoo.com
16676 Sharon Way Grass Valley, CA 95949

FORM LETTER C-166: JEFFREY KYLE

Response to Comment C-166-1

Please see Master Response 1.

Form Letter C-167

From: Jeffrey Kyle
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:04 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-167-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jeffrey Kyle
jdkj64@yahoo.com
16676 Sharon Way Grass Valley, CA 95949 Constituent

FORM LETTER C-167: JEFFREY KYLE

Response to Comment C-167-1

Please see Master Response 1.

Form Letter C-168

From: Jim Baku
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:16:42 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-168-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jim Baku
jimbaku38@yahoo.com
15802 duggans Rd Grass valley, CA 95949

FORM LETTER C-168: JIM BAKU

Response to Comment C-168-1

Please see Master Response 1.

Form Letter C-169

From: Jim Baku
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:16:55 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-169-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jim Baku
jimbaku38@yahoo.com
15802 duggans Rd Grass valley, CA 95949

FORM LETTER C-169: JIM BAKU

Response to Comment C-169-1

Please see Master Response 1.

Form Letter C-170

From: Jim Baku <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:17 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-170-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jim Baku
jimbaku38@yahoo.com
15802 duggans Rd Grass valley, CA 95949

1

FORM LETTER C-170: JIM BAKU

Response to Comment C-170-1

Please see Master Response 1.

Form Letter C-171

From: Jim Schuessler
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, March 2, 2022 10:49:41 AM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-171-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jim Schuessler
jim@schuesslerfamily.com
11593 POLARIS DR GRASS VALLEY, CA 95949 Constituent
This contact information has been verified

FORM LETTER C-171: JIM SCHUESSLER

Response to Comment C-171-1

Please see Master Response 1.

Form Letter C-172

From: Jim Schuessler <myvoice@oneclickpolitics.com>
Sent: Wednesday, March 2, 2022 10:50 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-172-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jim Schuessler
jim@schuesslerfamily.com
11593 POLARIS DR GRASS VALLEY, CA 95949 Constituent
This contact information has been verified

1

FORM LETTER C-172: JIM SCHUESSLER

Response to Comment C-172-1

Please see Master Response 1.

Form Letter C-173

From: Joe Bimmy
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:36 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-173-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Joe Bimmy
joe@bimmy.com
111 Bimmy Grass Vallet, CA 95945 Constituent

FORM LETTER C-173: JOE BIMMY

Response to Comment C-173-1

Please see Master Response 1.

Form Letter C-174

From: Joe Bimmy <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-174-1

Sincerely,
Joe Bimmy
joe@bimmy.com
111 Bimmy Grass Vallet, CA 95945

1

FORM LETTER C-174: JOE BIMMY

Response to Comment C-174-1

Please see Master Response 1.

Form Letter C-175

From: John H Brown <myvoice@oneclickpolitics.com>
Sent: Saturday, January 29, 2022 5:45 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-175-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John H Brown
jbndoutdoors@yahoo.com
134 carpenter street Grass Valley, CA 95945

1

FORM LETTER C-175: JOHN H. BROWN

Response to Comment C-175-1

Please see Master Response 1.

Form Letter C-176

From: John C Morton
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 5, 2022 7:38:37 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-176-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945

FORM LETTER C-176: JOHN C. MORTON

Response to Comment C-176-1

Please see Master Response 1.

Form Letter C-177

From: John C Morton
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:50 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-177-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945

FORM LETTER C-177: JOHN C. MORTON

Response to Comment C-177-1

Please see Master Response 1.

Form Letter C-178

From: John C Morton
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:50 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-178-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945

FORM LETTER C-178: JOHN C. MORTON

Response to Comment C-178-1

Please see Master Response 1.

Form Letter C-179

From: John C Morton <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 5, 2022 7:39 AM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-179-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945

1

FORM LETTER C-179: JOHN C. MORTON

Response to Comment C-179-1

Please see Master Response 1.

Form Letter C-180

From: John C Morton <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 5, 2022 7:39 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-180-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945

1

FORM LETTER C-180: JOHN MORTON

Response to Comment C-180-1

Please see Master Response 1.

Form Letter C-181

From: John C Morton <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-181-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John C Morton
acmgold@att.net
131 Stacey Lane Grass Valley, CA, CA 95945 Constituent

1

FORM LETTER C-181: JOHN C. MORTON

Response to Comment C-181-1

Please see Master Response 1.

Form Letter C-182

From: John Eramouspe
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:09:42 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-182-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John Eramouspe
moose41@att.net
10400Hawke Lane Nevada City, CA 95959

FORM LETTER C-182: JOHN ERAMOUSPE

Response to Comment C-182-1

Please see Master Response 1.

Form Letter C-183

From: John Eramouspe
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:09:43 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-183-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John Eramouspe
moose41@att.net
10400Hawke Lane Nevada City, CA 95959

FORM LETTER C-183: JOHN ERAMOUSPE

Response to Comment C-183-1

Please see Master Response 1.

Form Letter C-184

From: John Eramouspe <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 6:10 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-184-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John Eramouspe
moose41@att.net
10400Hawke Lane Nevada City, CA 95959

1

FORM LETTER C-184: JOHN ERAMOUSPE

Response to Comment C-184-1

Please see Master Response 1.

Form Letter C-185

From: John H Brown
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 5:45:27 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-185-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
John H Brown
jbndoutdoors@yahoo.com
134 carpenter street Grass Valley, CA 95945

FORM LETTER C-185: JOHN H. BROWN

Response to Comment C-185-1

Please see Master Response 1.

Form Letter C-186

From: John H Brown
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 5:45:27 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-186-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
John H Brown
jbndoutdoors@yahoo.com
134 carpenter street Grass Valley, CA 95945

FORM LETTER C-186: JOHN H. BROWN

Response to Comment C-186-1

Please see Master Response 1.

Form Letter C-187

From: john price
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:38 AM

Cannot identify

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-187-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
john price
price@att.com
14665 White Oak Ln. Grass Valley, CA 95945

FORM LETTER C-187: JOHN PRICE

Response to Comment C-187-1

Please see Master Response 1.

Form Letter C-188

From: john price <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-188-1

Sincerely,
john price
price@att.com
14665 White Oak Ln. Grass Valley, CA 95945

1

FORM LETTER C-188: JOHN PRICE

Response to Comment C-188-1

Please see Master Response 1.

Form Letter C-189

From: john price
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:37 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-189-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
john price
price@att.com
14665 White Oak Ln. Grass Valley, CA 95945 Constituent

FORM LETTER C-189: JOHN PRICE

Response to Comment C-189-1

Please see Master Response 1.

Form Letter C-190

From: Jon Siptrott
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:46 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-190-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Jon Siptrott
jsiptrott@gmail.com
9508 Clear Springs Circle Elk Grove, CA 95624 Constituent

FORM LETTER C-190: JON SIPTROTT

Response to Comment C-190-1

Please see Master Response 1.

Form Letter C-191

From: Jon Siptrott <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-191-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Jon Siptrott
jsiptrott@gmail.com
9508 Clear Springs Circle Elk Grove, CA 95624

1

FORM LETTER C-191: JON SIPTROTT

Response to Comment C-191-1

Please see Master Response 1.

Form Letter C-192

From: Jordan Kohler
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:01 AM

Dist 4

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C-192-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Jordan Kohler
jordantkohler@gmail.com
10799 GARDEN LN Rough And Ready, CA 95975

FORM LETTER C-192: JORDAN KOHLER

Response to Comment C-192-1

Please see Master Response 1.

Form Letter C-193

From: Jordan Kohler
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:02 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-193-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Jordan Kohler
jordantkohler@gmail.com
10799 GARDEN LN Rough And Ready, CA 95975 Constituent

FORM LETTER C-193: JORDAN KOHLER

Response to Comment C-193-1

Please see Master Response 1.

Form Letter C-194

From: Jordan Kohler <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-194-1

Sincerely,
Jordan Kohler
jordantkohler@gmail.com
10799 GARDEN LN Rough And Ready, CA 95975

1

FORM LETTER C-194: JORDAN KOHLER

Response to Comment C-194-1

Please see Master Response 1.

Form Letter C-195

From: Joyce E Elsner <myvoice@oneclickpolitics.com>
Sent: Saturday, March 26, 2022 8:03 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-195-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Joyce E Elsner
joyce.elsner@comcast.net
13586 Forest Park Circle Penn Valley, CA 95946-9141 Constituent
This contact information has been verified

1

FORM LETTER C-195: JOYCE E. ELSNER

Response to Comment C-195-1

Please see Master Response 1.

Form Letter C-196

From: Joyce E Elsner <myvoice@oneclickpolitics.com>
Sent: Saturday, March 26, 2022 8:03 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-196-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Joyce E Elsner
joyce.elsner@comcast.net
13586 Forest Park Circle Penn Valley, CA 95946-9141 Constituent
This contact information has been verified

1

FORM LETTER C-196: JOYCE E. ELSNER

Response to Comment C-196-1

Please see Master Response 1.

Form Letter C-197

From: Kaitlynn I White
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, March 24, 2022 5:40:08 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-197-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kaitlynn I White
white.kaitlynn@rocketmail.com
20427 starlight lane Grass Valley, CA 95945 Constituent
This contact information has been verified

FORM LETTER C-197: KAITLYNN I. WHITE

Response to Comment C-197-1

Please see Master Response 1.

Form Letter C-198

From: Kaitlynn I White <myvoice@oneclickpolitics.com>
Sent: Thursday, March 24, 2022 5:40 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-198-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kaitlynn I White
white.kaitlynn@rocketmail.com
20427 starlight lane Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-198: KAITLYNN I. WHITE

Response to Comment C-198-1

Please see Master Response 1.

From: Kaitlynn I White <myvoice@oneclickpolitics.com>
Sent: Thursday, March 24, 2022 5:40 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-199

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-199-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kaitlynn I White
white.kaitlynn@rocketmail.com
20427 starlight lane Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-199: KAITLYNN I. WHITE

Response to Comment C-199-1

Please see Master Response 1.

Form Letter C-200

From: Kenneth Scott Roberts
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Sunday, February 20, 2022 2:49:56 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-200-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kenneth Scott Roberts
robertsken@sbcglobal.net
16995 Glenshire Drive, Truckee, CA 96161 Truckee, CA 96161 Constituent
This contact information has been verified

FORM LETTER C-200: KENNETH SCOTT ROBERTS

Response to Comment C-200-1

Please see Master Response 1.

Form Letter C-201

From: Kenneth Scott Roberts <myvoice@oneclickpolitics.com>
Sent: Sunday, February 20, 2022 2:50 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-201-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kenneth Scott Roberts
robertsken@sbcglobal.net
16995 Glenshire Drive, Truckee, CA 96161 Truckee, CA 96161 Constituent
This contact information has been verified

1

FORM LETTER C-201: KENNETH SCOTT ROBERTS

Response to Comment C-201-1

Please see Master Response 1.

Form Letter C-202

From: kevin Halpin
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:29 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-202-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
kevin Halpin
kevin.halpin@att.net
12385 Sintek Ln Nevada City, CA 95959

FORM LETTER C-202: KEVIN HALPIN

Response to Comment C-202-1

Please see Master Response 1.

Form Letter C-203

From: kevin Halpin
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:30 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-203-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
kevin Halpin
kevin.halpin@att.net
12385 Sintek Ln Nevada City, CA 95959 Constituent

FORM LETTER C-203: KEVIN HALPIN

Response to Comment C-203-1

Please see Master Response 1.

Form Letter C-204

From: kevin Halpin <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-204-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
kevin Halpin
kevin.halpin@att.net
12385 Sintek Ln Nevada City, CA 95959

1

FORM LETTER C-204: KEVIN HALPIN

Response to Comment C-204-1

Please see Master Response 1.

Form Letter C-205

From: Kurt Senkbeil
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:05 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-205-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945 Constituent

FORM LETTER C-205: KURT SENKBEIL

Response to Comment C-205-1

Please see Master Response 1.

Form Letter C-206

From: Kurt Senkbeil
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 6:18:26 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-206-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

FORM LETTER C-206: KURT SENKBEIL

Response to Comment C-206-1

Please see Master Response 1.

Form Letter C-207

From: Kurt Senkbeil
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:04 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-207-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

FORM LETTER C-207: KURT SENKBEIL

Response to Comment C-207-1

Please see Master Response 1.

Form Letter C-208

From: Kurt Senkbeil
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 7, 2022 6:17:31 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-208-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

FORM LETTER C-208: KURT SENKBEIL

Response to Comment C-208-1

Please see Master Response 1.

Form Letter C-209

From: Kurt Senkbeil
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 6:18:16 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-209-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

FORM LETTER C-209: KURT SENKBEIL

Response to Comment C-209-1

Please see Master Response 1.

Form Letter C-210

From: Kurt Senkbeil
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 6:18:22 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-210-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

FORM LETTER C-210: KURT SENKBEIL

Response to Comment C-210-1

Please see Master Response 1.

Form Letter C-211

From: Kurt Senkbeil <myvoice@oneclickpolitics.com>
Sent: Friday, January 7, 2022 6:17 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

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C-211-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

1

FORM LETTER C-211: KURT SENKBEIL

Response to Comment C-211-1

Please see Master Response 1.

From: Kurt Senkbeil <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-212

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-212-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

1

FORM LETTER C-212: KURT SENKBEIL

Response to Comment C-212-1

Please see Master Response 1.

Form Letter C-213

From: Kurt Senkbeil <myvoice@oneclickpolitics.com>
Sent: Friday, January 7, 2022 6:17 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-213-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Kurt Senkbeil
kurtsenkbeil@icloud.com
594 Butler Street Grass Valley, CA 95945

1

FORM LETTER C-213: KURT SENKBEIL

Response to Comment C-213-1

Please see Master Response 1.

Form Letter C-214

From: Larry Arzt
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:22 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-214-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Arzt
lawrence.jay.arzt@gmail.com
14070 Cartwright Way Nevada City, CA 95959

FORM LETTER C-214: LARRY ARZT

Response to Comment C-214-1

Please see Master Response 1.

Form Letter C-215

From: Larry Arzt
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:23 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-215-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Arzt
lawrence.jay.arzt@gmail.com
14070 Cartwright Way Nevada City, CA 95959 Constituent

FORM LETTER C-215: LARRY ARZT

Response to Comment C-215-1

Please see Master Response 1.

Form Letter C-216

From: Larry Arzt <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-216-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Arzt
lawrence.jay.arzt@gmail.com
14070 Cartwright Way Nevada City, CA 95959

1

FORM LETTER C-216: LARRY ARZT

Response to Comment C-216-1

Please see Master Response 1.

Form Letter C-217

From: Larry Starn
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:18:24 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-217-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Starn
starnl139@gmail.com
13973 Gas Canyon Road Nevada City, CA 95959

FORM LETTER C-217: LARRY STARN

Response to Comment C-217-1

Please see Master Response 1.

Form Letter C-218

From: Larry Starn
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:38 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-218-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Starn
starnl139@gmail.com
13973 Gas Canyon Road Nevada City, CA 95959

FORM LETTER C-218: LARRY STARN

Response to Comment C-218-1

Please see Master Response 1.

Form Letter C-219

From: Larry Starn
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:37 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-219-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Starn
starnl139@gmail.com
13973 Gas Canyon Road Nevada City, CA 95959

FORM LETTER C-219: LARRY STARN

Response to Comment C-219-1

Please see Master Response 1.

Form Letter C-220

From: Larry Starn <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-220-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Starn
starnl139@gmail.com
13973 Gas Canyon Road Nevada City, CA 95959 Constituent

1

FORM LETTER C-220: LARRY STARN

Response to Comment C-220-1

Please see Master Response 1.

Form Letter C-221

From: Larry Starn <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 5:18 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-221-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Larry Starn
starnl139@gmail.com
13973 Gas Canyon Road Nevada City, CA 95959

1

FORM LETTER C-221: LARRY STARN

Response to Comment C-221-1

Please see Master Response 1.

Form Letter C-222

From: Laura Preece
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 9:21:13 PM

Dist 1

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-222-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Laura Preece
laura_preece@comcast.net
11999 Tree Top Circle Nevada City, CA 95959

FORM LETTER C-222: LAURA PREECE

Response to Comment C-222-1

Please see Master Response 1.

Form Letter C-223

From: Laura Preece
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 9:21:14 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-223-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Laura Preece
laura_preece@comcast.net
11999 Tree Top Circle Nevada City, CA 95959

FORM LETTER C-223: LAURA PREECE

Response to Comment C-223-1

Please see Master Response 1.

Form Letter C-224

From: Laura Preece <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 9:21 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-224-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Laura Preece
laura_preece@comcast.net
11999 Tree Top Circle Nevada City, CA 95959

1

FORM LETTER C-224: LAURA PREECE

Response to Comment C-224-1

Please see Master Response 1.

Form Letter C-225

From: Lee Matthews
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:55:21 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-225-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Lee Matthews
1961fishnlee@gmail.com
19151 last mile dr Grass valley, CA 95945

FORM LETTER C-225: LEE MATTHEWS

Response to Comment C-225-1

Please see Master Response 1.

Form Letter C-226

From: Lee Matthews
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:55:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-226-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Lee Matthews
1961fishnlee@gmail.com
19151 last mile dr Grass valley, CA 95945

FORM LETTER C-226: LEE MATTHEWS

Response to Comment C-226-1

Please see Master Response 1.

Form Letter C-227

From: Lee Matthews <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 5:55 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

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C-227-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Lee Matthews
1961fishnlee@gmail.com
19151 last mile dr Grass valley, CA 95945

1

FORM LETTER C-227: LEE MATTHEWS

Response to Comment C-227-1

Please see Master Response 1.

Form Letter C-228

From: Linda Fuentes
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:21 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-228-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Linda Fuentes
readinglinda@gmail.com
2036 Nevada City Hwy. Grass Valley, CA 95945

FORM LETTER C-228: LINDA FUENTES

Response to Comment C-228-1

Please see Master Response 1.

Form Letter C-229

From: Linda Fuentes
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:22 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-229-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Linda Fuentes
readinglinda@gmail.com
2036 Nevada City Hwy. Grass Valley, CA 95945 Constituent

FORM LETTER C-229: LINDA FUENTES

Response to Comment C-229-1

Please see Master Response 1.

Form Letter C-230

From: Linda Fuentes <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-230-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Linda Fuentes
readinglinda@gmail.com
2036 Nevada City Hwy. Grass Valley, CA 95945

1

FORM LETTER C-230: LINDA FUENTES

Response to Comment C-230-1

Please see Master Response 1.

Form Letter C-231

From: Lock Richards
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-231-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Lock Richards
lock@highlandcre.com
11300 Willow Valley Rd Nevada City, CA 95959 Constituent

FORM LETTER C-231: LOCK RICHARDS

Response to Comment C-231-1

Please see Master Response 1.

Form Letter C-232

From: Lock Richards
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-232-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Lock Richards
lock@highlandcre.com
11300 Willow Valley Rd Nevada City, CA 95959 Constituent

FORM LETTER C-232: LOCK RICHARDS

Response to Comment C-232-1

Please see Master Response 1.

From: Lock Richards <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-233

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-233-1

Sincerely,
Lock Richards
lock@highlandcre.com
11300 Willow Valley Rd Nevada City, CA 95959

1

FORM LETTER C-233: LOCK RICHARDS

Response to Comment C-233-1

Please see Master Response 1.

Form Letter C-234

From: Lynn Haight
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:31 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-234-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Lynn Haight
ldhaight@gmail.com
14949 Oak Meadow Road Penn Valley, CA 95946

FORM LETTER C-234: LYNN HAIGHT

Response to Comment C-234-1

Please see Master Response 1.

Form Letter C-235

From: Lynn Haight
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:33 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-235-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Lynn Haight
ldhaight@gmail.com
14949 Oak Meadow Road Penn Valley, CA 95946 Constituent

FORM LETTER C-235: LYNN HAIGHT

Response to Comment C-235-1

Please see Master Response 1.

Form Letter C-236

From: Lynn Haight <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-236-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Lynn Haight
ldhaight@gmail.com
14949 Oak Meadow Road Penn Valley, CA 95946

1

FORM LETTER C-236: LYNN HAIGHT

Response to Comment C-236-1

Please see Master Response 1.

Form Letter C-237

From: Marc Davis
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 1, 2022 9:39:16 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-237-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Marc Davis
davismmdj@comcast.net
19078 Wildflower Drive Penn Valley, CA 95946

FORM LETTER C-237: MARC DAVIS

Response to Comment C-237-1

Please see Master Response 1.

Form Letter C-238

From: Marc Davis
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:25 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-238-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Marc Davis
davis.marc49@gmail.com
19078 Wildflower Drive Penn Valley, CA 95946 Constituent

FORM LETTER C-238: MARK DAVIS

Response to Comment C-238-1

Please see Master Response 1.

Form Letter C-239

From: Marc Davis
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:24 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-239-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Marc Davis
davis.marc49@gmail.com
19078 Wildflower Drive Penn Valley, CA 95946

FORM LETTER C-239: MARC DAVIS

Response to Comment C-239-1

Please see Master Response 1.

Form Letter C-240

From: Marc Davis
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 1, 2022 9:40:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-240-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Marc Davis
davismmdj@comcast.net
19078 Wildflower Drive Penn Valley, CA 95946

FORM LETTER C-240: MARC DAVIS

Response to Comment C-240-1

Please see Master Response 1.

Form Letter C-241

From: Marc Davis <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-241-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Marc Davis
davis.marc49@gmail.com
19078 Wildflower Drive Penn Valley, CA 95946

1

FORM LETTER C-241: MARC DAVIS

Response to Comment C-241-1

Please see Master Response 1.

Form Letter C-242

From: Marc Davis <myvoice@oneclickpolitics.com>
Sent: Tuesday, February 1, 2022 9:39 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-242-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Marc Davis
davismmdj@comcast.net
19078 Wildflower Drive Penn Valley, CA 95946

1

FORM LETTER C-242: MARC DAVIS

Response to Comment C-242-1

Please see Master Response 1.

Form Letter C-243

From: Margaret Harcourt
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:07:44 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-243-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 95946

FORM LETTER C-243: MARGARET HARCOURT

Response to Comment C-243-1

Please see Master Response 1.

Form Letter C-244

From: Margaret Harcourt
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 3:15:05 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-244-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Harcourt
ponysragster@earthlink.net
PO Box 4039 Paso Robles, CA 93447

FORM LETTER C-244: MARGARET HARCOURT

Response to Comment C-244-1

Please see Master Response 1.

Form Letter C-245

From: Margaret Harcourt
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:51 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-245-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 94946

FORM LETTER C-245: MAGARET HARCOURT

Response to Comment C-245-1

Please see Master Response 1.

Form Letter C-246

From: Margaret Harcourt
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:49 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-246-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 94946

FORM LETTER C-246: MARGARET HARCOURT

Response to Comment C-246-1

Please see Master Response 1.

Form Letter C-247

From: Margaret Harcourt
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:07:42 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-247-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 95946

FORM LETTER C-247: MARGARET HARCOURT

Response to Comment C-247-1

Please see Master Response 1.

Form Letter C-248

From: Margaret Harcourt
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 3:15:02 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-248-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Harcourt
ponysragster@earthlink.net
PO Box 4039 Paso Robles, CA 93447

FORM LETTER C-248: MARGARET HARCOURT

Response to Comment C-248-1

Please see Master Response 1.

Form Letter C-249

From: Margaret Harcourt <myvoice@oneclickpolitics.com>
Sent: Saturday, January 29, 2022 3:15 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-249-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Margaret Harcourt
ponysragster@earthlink.net
PO Box 4039 Paso Robles, CA 93447

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FORM LETTER C-249: MARGARET HARCOURT

Response to Comment C-249-1

Please see Master Response 1.

Form Letter C-250

From: Margaret Harcourt <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 7:08 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-250-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 95946

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FORM LETTER C-250: MARGARET HARCOURT

Response to Comment C-250-1

Please see Master Response 1.

Form Letter C-251

From: Margaret Harcourt <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

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C-251-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Margaret Harcourt
mharcourt@live.com
19440 Edgett Lane Penn Valley, CA 94946 Constituent

1

FORM LETTER C-251: MARGARET HARCOURT

Response to Comment C-251-1

Please see Master Response 1.

Form Letter C-252

From: Margaret Urke
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Monday, January 17, 2022 2:21:32 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-252-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Margaret Urke
margareturke@gmail.com
13924 Day Spring Road Grass Valley, CA 95945

FORM LETTER C-252: MARGARET URKE

Response to Comment C-252-1

Please see Master Response 1.

Form Letter C-253

From: Margaret Urke <myvoice@oneclickpolitics.com>
Sent: Monday, January 17, 2022 2:21 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-253-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Margaret Urke
margareturke@gmail.com
13924 Day Spring Road Grass Valley, CA 95945

1

FORM LETTER C-253: MARGARET URKE

Response to Comment C-253-1

Please see Master Response 1.

Form Letter C-254

From: Marie Allen
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 22, 2022 12:40:44 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-254-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Marie Allen
yezdanhu@att.net
3459 Monroe Avenue Lafayette, CA 94549-4520 Constituent
This contact information has been verified

FORM LETTER C-254: MARIE ALLEN

Response to Comment C-254-1

Please see Master Response 1.

Form Letter C-255

From: Marie Allen <myvoice@oneclickpolitics.com>
Sent: Tuesday, February 22, 2022 12:41 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-255-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Marie Allen
yezdanhu@att.net
3459 Monroe Avenue Lafayette, CA 94549-4520 Constituent
This contact information has been verified

1

FORM LETTER C-255: MARIE ALLEN

Response to Comment C-255-1

Please see Master Response 1.

Form Letter C-256

From: Martha Turner
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:14 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-256-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Martha Turner
turnermartha19@gmail.com
10860 Dolores Drive Grass Valley, CA 95945

FORM LETTER C-256: MARTHA TURNER

Response to Comment C-256-1

Please see Master Response 1.

Form Letter C-257

From: Martha Turner
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:15 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-257-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Martha Turner
turnermartha19@gmail.com
10860 Dolores Drive Grass Valley, CA 95945 Constituent

FORM LETTER C-257: MARTHA TURNER

Response to Comment C-257-1

Please see Master Response 1.

Form Letter C-258

From: Martha Turner <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-258-1

Sincerely,
Martha Turner
turnermartha19@gmail.com
10860 Dolores Drive Grass Valley, CA 95945

1

FORM LETTER C-258: MARTHA TURNER

Response to Comment C-258-1

Please see Master Response 1.

Form Letter C-259

From: Matt McDonad
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:22 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-259-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Matt McDonad
matt_mcdonald2106@yahoo.com
5754 Gelston Way El Dorado Hills, CA 95762 Constituent

FORM LETTER C-259: MATT MCDONALD

Response to Comment C-259-1

Please see Master Response 1.

Form Letter C-260

From: Matt McDonad <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-260-1

Sincerely,
Matt McDonad
matt_mcdonald2106@yahoo.com
5754 Gelston Way El Dorado Hills, CA 95762

FORM LETTER C-260: MATT MCDONALD

Response to Comment C-260-1

Please see Master Response 1.

Form Letter C-261

From: Matt McDonald
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:35 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-261-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Matt McDonald
mattmcdonald@risegrassvalley.com
5754 Gelston Way El Dorado Hills, CA 95762 Constituent

FORM LETTER C-261: MATT MCDONALD

Response to Comment C-261-1

Please see Master Response 1.

Form Letter C-262

From: Matt McDonald <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:26 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-262-1

Sincerely,
Matt McDonald
mattmcdonald@risegrassvalley.com
5754 Gelston Way El Dorado Hills, CA 95762

1

FORM LETTER C-262: MATT MCDONLAD

Response to Comment C-262-1

Please see Master Response 1.

Form Letter C-263

From: Michael Norton
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 14, 2022 12:08:26 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-263-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Michael Norton
mnorton@gp-mfg.com
114 Picadilly Ln Grass Valley, CA 95949

FORM LETTER C-263: MICHAEL NORTON

Response to Comment C-263-1

Please see Master Response 1.

Form Letter C-264

From: Michael Norton <myvoice@oneclickpolitics.com>
Sent: Friday, January 14, 2022 12:08 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-264-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Michael Norton
mnorton@gp-mfg.com
114 Picadilly Ln Grass Valley, CA 95949

1

FORM LETTER C-264: MICHAEL NORTON

Response to Comment C-264-1

Please see Master Response 1.

Form Letter C-265

From: Michael Pesonen
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:19:41 PM

Not a County resident

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-265-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Michael Pesonen
pesonenmike@yahoo.com
16220 Tish-A-Tang LOWER LAKE, CA 95457

FORM LETTER C-265: MICHAEL PESONEN

Response to Comment C-265-1

Please see Master Response 1.

Form Letter C-266

From: Michael Pesonen
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:19:44 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-266-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Michael Pesonen
pesonenmike@yahoo.com
16220 Tish-A-Tang LOWER LAKE, CA 95457

FORM LETTER C-266: MICHAEL PESONEN

Response to Comment C-266-1

Please see Master Response 1.

Form Letter C-267

From: Michael Pesonen <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:20 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-267-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Michael Pesonen
pesonenmike@yahoo.com
16220 Tish-A-Tang LOWER LAKE, CA 95457

1

FORM LETTER C-267: MICHAEL PESONEN

Response to Comment C-267-1

Please see Master Response 1.

Form Letter C-268

From: Mike Alcala
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 18, 2022 12:07:28 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-268-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Mike Alcala
mike@petersdrilling.com
14196 bar ela ranch rd Grass valley, CA 95945

FORM LETTER C-268: MIKE ALCALA

Response to Comment C-268-1

Please see Master Response 1.

Form Letter C-269

From: Mike Alcala
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 18, 2022 12:07:24 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-269-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Mike Alcala
mike@petersdrilling.com
14196 bar ela ranch rd Grass valley, CA 95945

FORM LETTER C-269: MIKE ALCALA

Response to Comment C-269-1

Please see Master Response 1.

Form Letter C-270

From: Mike Alcala <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 18, 2022 12:07 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-270-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Mike Alcala
mike@petersdrilling.com
14196 bar ela ranch rd Grass valley, CA 95945

1

FORM LETTER C-270: MIKE ALCALA

Response to Comment C-270-1

Please see Master Response 1.

Form Letter C-271

From: Mike Wade
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:20 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-271-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Mike Wade
miked@thankselonllc.com
8913 Beacon Ridge Trl Reno, NV 89523

FORM LETTER C-271: MIKE WADE

Response to Comment C-271-1

Please see Master Response 1.

Form Letter C-272

From: Mike Wade <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-272-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Mike Wade
miked@thankselonllc.com
8913 Beacon Ridge Trl Reno, NV 89523

1

FORM LETTER C-272: MIKE WADE

Response to Comment C-272-1

Please see Master Response 1.

Form Letter C-273

From: Morgan Juric <myvoice@oneclickpolitics.com>
Sent: Thursday, February 17, 2022 9:41 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-273-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Morgan Juric
mej1324@gmail.com
10429 DOLOMITE CT. ROUGH AND READY, CA 95975 Constituent
This contact information has been verified

1

FORM LETTER C-273: MORGAN JURIC

Response to Comment C-273-1

Please see Master Response 1.

Form Letter C-274

From: Myles Vickers
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, February 16, 2022 8:59:57 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-274-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Myles Vickers
mylesvickers@me.com
10058 E Alder Creek Rd Truckee, CA 96161 Constituent
This contact information has been verified

FORM LETTER C-274: MYLES VICKERS

Response to Comment C-274-1

Please see Master Response 1.

Form Letter C-275

From: Myles Vickers <myvoice@oneclickpolitics.com>
Sent: Wednesday, February 16, 2022 9:00 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

C-275-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Myles Vickers
mylesvickers@me.com
10058 E Alder Creek Rd Truckee, CA 96161 Constituent
This contact information has been verified

1

FORM LETTER C-275: MYLES VICKERS

Response to Comment C-275-1

Please see Master Response 1.

Form Letter C-276

From: No Mine!
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:11 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-276-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
No Mine!
jreynoldsbotany@aol.com
14201 Idaho Maryland Road Nevada City, CA 95959

FORM LETTER C-276: J. REYNOLDS

Response to Comment C-276-1

Please see Master Response 1.

Form Letter C-277

From: Paul Daniel Jordan
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:13:28 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-277-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Hwy Grass Valley, CA 95945

FORM LETTER C-277: PAUL DANIEL JORDAN

Response to Comment C-277-1

Please see Master Response 1.

Form Letter C-278

From: Paul Daniel Jordan
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:57 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-278-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Highway Grass valley, CA 95945

FORM LETTER C-278: PAUL DANIEL JORDAN

Response to Comment C-278-1

Please see Master Response 1.

Form Letter C-279

From: Paul Daniel Jordan
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:56 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-279-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Highway Grass valley, CA 95945

FORM LETTER C-279: PAUL DANIEL JORDAN

Response to Comment C-279-1

Please see Master Response 1.

Form Letter C-280

From: Paul Daniel Jordan
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 6:13:21 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-280-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Hwy Grass Valley, CA 95945

FORM LETTER C-280: PAUL DANIEL JORDAN

Response to Comment C-280-1

Please see Master Response 1.

Form Letter C-281

From: Paul Daniel Jordan <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-281-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Highway Grass valley, CA 95945 Constituent

1

FORM LETTER C-281: PAUL DANIEL JORDAN

Response to Comment C-281-1

Please see Master Response 1.

Form Letter C-282

From: Paul Daniel Jordan <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 6:13 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-282-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Paul Daniel Jordan
juiceforlife@live.com
12219 Rough and Ready Hwy Grass Valley, CA 95945

1

FORM LETTER C-282: PAUL DANIEL JORDAN

Response to Comment C-282-1

Please see Master Response 1.

Form Letter C-283

From: Pearce Boyer
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 10:14:53 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-283-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Pearce Boyer
pfb3@cebridge.net
11416 Timothy Way Grass Valley, CA 95949

FORM LETTER C-283: PEARCE BOYER

Response to Comment C-283-1

Please see Master Response 1.

Form Letter C-284

From: Pearce Boyer
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 10:14:53 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-284-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Pearce Boyer
pfb3@cebridge.net
11416 Timothy Way Grass Valley, CA 95949

FORM LETTER C-284: PEARCE BOYER

Response to Comment C-284-1

Please see Master Response 1.

From: Pearce Boyer <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 10:15 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-285

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-285-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Pearce Boyer
pfb3@cebridge.net
11416 Timothy Way Grass Valley, CA 95949

1

FORM LETTER C-285: PEARCE BOYER

Response to Comment C-285-1

Please see Master Response 1.

Form Letter C-286

From: Pete Perez <myvoice@oneclickpolitics.com>
Sent: Friday, March 25, 2022 7:04 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-286-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Pete Perez
pperezdh60@gmail.com
126 Lidster Ave. Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-286: PETE PEREZ

Response to Comment C-286-1

Please see Master Response 1.

Form Letter C-287

From: Pete Perez <myvoice@oneclickpolitics.com>
Sent: Friday, March 25, 2022 7:04 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-287-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Pete Perez
pperezdh60@gmail.com
126 Lidster Ave. Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-287: PETE PEREZ

Response to Comment C-287-1

Please see Master Response 1.

Form Letter C-288

From: Philippe Mickelson
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, February 19, 2022 8:29:55 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-288-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Philippe Mickelson
pmickels@gmail.com
10935 Darlene Ct Grass Valley, CA 95949 Constituent
This contact information has been verified

FORM LETTER C-288: PHILIPPE MICKELSON

Response to Comment C-288-1

Please see Master Response 1.

From: Philippe Mickelson <myvoice@oneclickpolitics.com>
Sent: Saturday, February 19, 2022 8:30 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-289

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-289-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Philippe Mickelson
pmickels@gmail.com
10935 Darlene Ct Grass Valley, CA 95949 Constituent
This contact information has been verified

1

FORM LETTER C-289: PHILIPPE MICKELSON

Response to Comment C-289-1

Please see Master Response 1.

Form Letter C-290

From: Ricardo Fuentes
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:18:11 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-290-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ricardo Fuentes
politicalrick@gmail.com
20360Nevada City Hwy. # 263 Grass Valley, CA 95945

FORM LETTER C-290: RICARDO FUENTES

Response to Comment C-290-1

Please see Master Response 1.

Form Letter C-291

From: Ricardo Fuentes
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:18:31 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-291-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Ricardo Fuentes
politicalrick@gmail.com
20360Nevada City Hwy. # 263 Grass Valley, CA 95945

FORM LETTER C-291: RICARDO FUENTES

Response to Comment C-291-1

Please see Master Response 1.

Form Letter C-292

From: Ricardo Fuentes <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:18 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-292-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ricardo Fuentes
politicalrick@gmail.com
20360Nevada City Hwy. # 263 Grass Valley, CA 95945

1

FORM LETTER C-292: RICARDO FUENTES

Response to Comment C-292-1

Please see Master Response 1.

Form Letter C-293

From: Richard Carter
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:35:13 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-293-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Richard Carter
richcartersocal@me.com
800 Freeman Ln, Apt 101 Grass Valley, CA 95949-7740

FORM LETTER C-293: RICHARD CARTER

Response to Comment C-293-1

Please see Master Response 1.

Form Letter C-294

From: Richard Carter
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:35:14 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-294-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Richard Carter
richcartersocal@me.com
800 Freeman Ln, Apt 101 Grass Valley, CA 95949-7740

FORM LETTER C-294: RICHARD CARTER

Response to Comment C-294-1

Please see Master Response 1.

Form Letter C-295

From: Richard Carter <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 5:35 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-295-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Richard Carter
richcartersocal@me.com
800 Freeman Ln, Apt 101 Grass Valley, CA 95949-7740

1

FORM LETTER C-295: RICHARD CARTER

Response to Comment C-295-1

Please see Master Response 1.

Form Letter C-296

From: Richard Kuhwarth, CPA Retired
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:41:42 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-296-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Richard Kuhwarth, CPA Retired
kuhwarth@aol.com
12252 Francis Drive Grass Vallley, CA 95949

FORM LETTER C-296: RICHARD KUWARTH

Response to Comment C-296-1

Please see Master Response 1.

Form Letter C-297

From: Richard Kuhwarth, CPA Retired
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:41:46 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-297-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Richard Kuhwarth, CPA Retired
kuhwarth@aol.com
12252 Francis Drive Grass Vallley, CA 95949

FORM LETTER C-297: RICHARD KUHWARTH

Response to Comment C-297-1

Please see Master Response 1.

Form Letter C-298

From: Richard Kuhwarth, CPA Retired <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:42 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-298-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Richard Kuhwarth, CPA Retired
kuhwarth@aol.com
12252 Francis Drive Grass Valley, CA 95949

1

FORM LETTER C-298: RICHARD KUHWARTH

Response to Comment C-298-1

Please see Master Response 1.

Form Letter C-299

From: Robert Haight
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:33 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-299-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Robert Haight
bobhaight@gmail.com
14949 Oak Meadow Rd Penn Valley, CA 95946

FORM LETTER C-299: ROBERT HAIGHT

Response to Comment C-299-1

Please see Master Response 1.

Form Letter C-300

From: Richard Kuhwarth, CPA Retired
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:41:46 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-300-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Richard Kuhwarth, CPA Retired
kuhwarth@aol.com
12252 Francis Drive Grass Vallley, CA 95949

FORM LETTER C-300: RICHARD KUHWARTH

Response to Comment C-300-1

Please see Master Response 1.

Form Letter C-301

From: Robert Haight <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-301-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Robert Haight
bobhaight@gmail.com
14949 Oak Meadow Rd Penn Valley, CA 95946

1

FORM LETTER C-301: ROBERT HAIGHT

Response to Comment C-301-1

Please see Master Response 1.

Form Letter C-302

From: Robert Ludwig
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 15, 2022 5:56:38 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-302-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Robert Ludwig
bob@palmsrv.com
11483 Lower Colfax Rd Grass Valley, CA 95945 Constituent
This contact information has been verified

FORM LETTER C-302: ROBERT LUDWIG

Response to Comment C-302-1

Please see Master Response 1.

From: Robert Ludwig <myvoice@oneclickpolitics.com>
Sent: Tuesday, February 15, 2022 5:57 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-303

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-303-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Robert Ludwig
bob@palmsrv.com
11483 Lower Colfax Rd Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-303: ROBER LUDWIG

Response to Comment C-303-1

Please see Master Response 1.

Form Letter C-304

From: ROBERT SEIDLITZ
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:27:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-304-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
ROBERT SEIDLITZ
bsbulldog55@live.com
10556combie RD #6506 Auburn, CA 95602

FORM LETTER C-304: ROBERT SEIDLITZ

Response to Comment C-304-1

Please see Master Response 1.

Form Letter C-305

From: ROBERT SEIDLITZ
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:27:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-305-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
ROBERT SEIDLITZ
bsbulldog55@live.com
10556combie RD #6506 Auburn, CA 95602

FORM LETTER C-305: ROBERT SEIDLITZ

Response to Comment C-305-1

Please see Master Response 1.

Form Letter C-306

From: robert Seidlitz
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:39 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-306-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
robert Seidlitz
bsbulldog55@live.com
10556 Combie Rd #6506 Auburn, CA 95602

FORM LETTER C-306: ROBERT SEIDLITZ

Response to Comment C-306-1

Please see Master Response 1.

Form Letter C-307

From: ROBERT SEIDLITZ
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:27:11 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-307-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
ROBERT SEIDLITZ
bsbulldog55@live.com
10556combie RD #6506 Auburn, CA 95602

FORM LETTER C-307: ROBERT SEIDLITZ

Response to Comment C-307-1

Please see Master Response 1.

Form Letter C-308

From: robert Seidlitz <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-308-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
robert Seidlitz
bsbulldog55@live.com
10556 Combie Rd #6506 Auburn, CA 95602 Constituent

1

FORM LETTER C-308: ROBERT SEIDLITZ

Response to Comment C-308-1

Please see Master Response 1.

Form Letter C-309

From: ROBERT SEIDLITZ <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:27 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-309-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
ROBERT SEIDLITZ
bsbulldog55@live.com
10556combie RD #6506 Auburn, CA 95602

1

FORM LETTER C-309: ROBERT SEIDLITZ

Response to Comment C-309-1

Please see Master Response 1.

Form Letter C-310

From: Ron Kliewer <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

C-310-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ron Kliewer
r.kliewer@aol.com
35863 Avenue H Yucaipa, CA 92399

1

FORM LETTER C-310: RON KLIEWER

Response to Comment C-310-1

Please see Master Response 1.

Form Letter C-311

From: Ronald R Arndt <myvoice@oneclickpolitics.com>
Sent: Sunday, January 16, 2022 5:14 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-311-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR GRASS VALLEY, CA 95945

FORM LETTER C-311: RONALD R. ARNDT

Response to Comment C-311-1

Please see Master Response 1.

Form Letter C-312

From: Ronald R Arndt <myvoice@oneclickpolitics.com>
Sent: Sunday, January 16, 2022 5:14 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-312-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR GRASS VALLEY, CA 95945

1

FORM LETTER C-312: RONALD R. ARNDT

Response to Comment C-312-1

Please see Master Response 1.

Form Letter C-313

From: Ronald R Arndt <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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C-313-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR Grass Valley, CA 95945 Constituent

1

FORM LETTER C-313: RONALD R. ARNDT

Response to Comment C-313-1

Please see Master Response 1.

Form Letter C-314

From: Ronald R Arndt
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Sunday, January 16, 2022 5:13:54 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-314-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR GRASS VALLEY, CA 95945

FORM LETTER C-314: RONALD R. ARNDT

Response to Comment C-314-1

Please see Master Response 1.

Form Letter C-315

From: Ronald R Arndt
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:07 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-315-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR Grass Valley, CA 95945

FORM LETTER C-315: RONALD R. ARNDT

Response to Comment C-315-1

Please see Master Response 1.

Form Letter C-316

From: Ronald R Arndt
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:06 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-316-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Ronald R Arndt
ronarndtskip@gmail.com
337 VISTAMONT DR Grass Valley, CA 95945

FORM LETTER C-316: RONALD R. ARNDT

Response to Comment C-316-1

Please see Master Response 1.

Form Letter C-317

From: Russell E George
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:15 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-317-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Russell E George
jangeorge1945@gmail.com
21979 Clivus Drive Grass Valley, CA 95949

FORM LETTER C-317: RUSSELL E. GEORGE

Response to Comment C-317-1

Please see Master Response 1.

Form Letter C-318

From: Russell E George
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-318-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Russell E George
jangeorge1945@gmail.com
21979 Clivus Drive Grass Valley, CA 95949 Constituent

FORM LETTER C-318: RUSSEL E. GEORGE

Response to Comment C-318-1

Please see Master Response 1.

Form Letter C-319

From: Russell E George <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-319-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Russell E George
jangeorge1945@gmail.com
21979 Clivus Drive Grass Valley, CA 95949

1

FORM LETTER C-319: RUSSEL E. GEORGE

Response to Comment C-319-1

Please see Master Response 1.

Form Letter C-320

From: Sadie potter <myvoice@oneclickpolitics.com>
Sent: Wednesday, March 23, 2022 7:41 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-320-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Sadie potter
sadiielorraiine@gmail.com
P.O. Box 1551 Penn Valley, CA 95946 Constituent
This contact information has been verified

1

FORM LETTER C-320: SADIE POTTER

Response to Comment C-320-1

Please see Master Response 1.

Form Letter C-321

From: Sadie potter <myvoice@oneclickpolitics.com>
Sent: Wednesday, March 23, 2022 7:41 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

C-321-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Sadie potter
sadiielorraiine@gmail.com
P.O. Box 1551 Penn Valley, CA 95946 Constituent
This contact information has been verified

1

FORM LETTER C-321: SADIE POTTER

Response to Comment C-321-1

Please see Master Response 1.

Form Letter C-322

From: Scott Kimura
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:58 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-322-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Scott Kimura
snottywad@gmail.com
P.O. Box 788 Manson, WA 98831

FORM LETTER C-322: SCOTT KIMURA

Response to Comment C-322-1

Please see Master Response 1.

Form Letter C-323

From: Scott Kimura <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-323-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Scott Kimura
snottywad@gmail.com
P.O. Box 788 Manson, WA 98831

1

FORM LETTER C-323: SCOTT KIMURA

Response to Comment C-323-1

Please see Master Response 1.

Form Letter C-324

From: Sharon and Guari Delgado
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:38 AM

Dis 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-324-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Sincerely,
Sharon and Guari Delgado
sharondelgado@earth-justice.org
11328 Red Dog Road Nevada City, CA 95959

FORM LETTER C-324: SHARON AND GUARI DELGADO

Response to Comment C-324-1

Please see Master Response 1.

Form Letter C-325

From: Sharon and Guari Delgado
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:26:41 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-325-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Sincerely,
Sharon and Guari Delgado
sharondelgado@earth-justice.org
11328 Red Dog Road Nevada City, CA 95959 Constituent

FORM LETTER C-325: SHARON AND GUARI DELGADO

Response to Comment C-325-1

Please see Master Response 1.

Form Letter C-326

From: Sharon and Guari Delgado <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

C-326-1

Sincerely,
Sharon and Guari Delgado
sharondelgado@earth-justice.org
11328 Red Dog Road Nevada City, CA 95959

1

FORM LETTER C-326: SHARON AND GUARI DELGADO

Response to Comment C-326-1

Please see Master Response 1.

Form Letter C-327

From: Sherri Oakley
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:04 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-327-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Sherri Oakley
oakleysw@aol.com
18211 Indian Springs Rd Penn Valley, CA 95946

FORM LETTER C-327: SHERRI OAKLEY

Response to Comment C-327-1

Please see Master Response 1.

Form Letter C-328

From: Sherri Oakley
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:05 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-328-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Sherri Oakley
oakleysw@aol.com
18211 Indian Springs Rd Penn Valley, CA 95946 Constituent

FORM LETTER C-328: SHERRI OAKLEY

Response to Comment C-328-1

Please see Master Response 1.

Form Letter C-329

From: Sherri Oakley <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-329-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Sherri Oakley
oakleysw@aol.com
18211 Indian Springs Rd Penn Valley, CA 95946

1

FORM LETTER C-329: SHERRI OAKLEY

Response to Comment C-329-1

Please see Master Response 1.

Form Letter C-330

From: SHIRLYN A VOGEL
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:06:12 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-330-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SHIRLYN A VOGEL
shirlyn.vogel@yahoo.com
19193 CHAPARRAL DR PENN VALLEY, CA 95946

FORM LETTER C-330: SHIRLYN A. VOGEL

Response to Comment C-330-1

Please see Master Response 1.

Form Letter C-331

From: SHIRLYN A VOGEL
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:06:14 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-331-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SHIRLYN A VOGEL
shirlyn.vogel@yahoo.com
19193 CHAPARRAL DR PENN VALLEY, CA 95946

FORM LETTER C-331: SHIRLYN A. VOGEL

Response to Comment C-331-1

Please see Master Response 1.

Form Letter C-332

From: SHIRLYN A VOGEL <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:06 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-332-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SHIRLYN A VOGEL
shirlyn.vogel@yahoo.com
19193 CHAPARRAL DR PENN VALLEY, CA 95946

1

FORM LETTER C-332: SHIRLYN A. VOGEL

Response to Comment C-332-1

Please see Master Response 1.

Form Letter C-333

From: Steve Barnes
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Sunday, February 20, 2022 2:06:36 PM

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-333-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steve Barnes
wanabinuit@gmail.com
13773 Squirrel Creek Rd Grass Valley, CA 95945 Constituent
This contact information has been verified

FORM LETTER C-333: STEVE BARNES

Response to Comment C-333-1

Please see Master Response 1.

Form Letter C-334

From: Steve Barnes <myvoice@oneclickpolitics.com>
Sent: Sunday, February 20, 2022 2:06 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-334-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steve Barnes
wanabinuit@gmail.com
13773 Squirrel Creek Rd Grass Valley, CA 95945 Constituent
This contact information has been verified

1

FORM LETTER C-334: STEVE BARNES

Response to Comment C-334-1

Please see Master Response 1.

Form Letter C-335

From: Steve Murphy
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:55 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-335-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steve Murphy
murphy.steve@hotmail.com
10693 Starfire Ct. Auburn, CA 95602

FORM LETTER C-335: STEVE MURPHY

Response to Comment C-335-1

Please see Master Response 1.

Form Letter C-336

From: Steve Murphy
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:55 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-336-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steve Murphy
murphy.steve@hotmail.com
10693 Starfire Ct. Auburn, CA 95602 Constituent

FORM LETTER C-336: STEVE MURPHY

Response to Comment C-336-1

Please see Master Response 1.

Form Letter C-337

From: Steve Murphy <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

C-337-1

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steve Murphy
murphy.steve@hotmail.com
10693 Starfire Ct. Auburn, CA 95602

1

FORM LETTER C-337: STEVE MURPHY

Response to Comment C-337-1

Please see Master Response 1.

Form Letter C-338

From: Steven Borgnis
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 4, 2022 11:29:03 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-338-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
snorg@arr.net
13248 Noel ln Grass. Valley, CA 95945

FORM LETTER C-338: STEVE BORGNIS

Response to Comment C-338-1

Please see Master Response 1.

Form Letter C-339

From: Steven Borgnis
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:59:46 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-339-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945

FORM LETTER C-339: STEVE BORGNIS

Response to Comment C-339-1

Please see Master Response 1.

Form Letter C-340

From: Steven Borgnis
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:38 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-340-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

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Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945

FORM LETTER C-340: STEVE BORGNIS

Response to Comment C-340-1

Please see Master Response 1.

Form Letter C-341

From: Steven Borgnis
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:37 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-341-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945

FORM LETTER C-341: STEVE BORGNIS

Response to Comment C-341-1

Please see Master Response 1.

Form Letter C-342

From: Steven Borgnis
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 5:59:49 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-342-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945

FORM LETTER C-342: STEVEN BORGNIS

Response to Comment C-342-1

Please see Master Response 1.

Form Letter C-343

From: Steven Borgnis <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 11:29 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-343-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
snorg@arr.net
13248 Noel In Grass. Valley, CA 95945

1

FORM LETTER C-343: STEVE BORGNIS

Response to Comment C-343-1

Please see Master Response 1.

Form Letter C-344

From: Steven Borgnis <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-344-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945 Constituent

1

FORM LETTER C-344: STEVE BORGNIS

Response to Comment C-344-1

Please see Master Response 1.

Form Letter C-345

From: Steven Borgnis <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 6:00 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-345-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Steven Borgnis
sborg@att.net
13248 Noel ln Grass valley, CA 95945

1

FORM LETTER C-345: STEVE BORGNIS

Response to Comment C-345-1

Please see Master Response 1.

Form Letter C-346

From: SUNNIE SKILES <myvoice@oneclickpolitics.com>
Sent: Monday, March 21, 2022 1:03 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-346-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SUNNIE SKILES
sskiles@proyouth.net
727 Quail Haven Rd Colfax, CA 95713 Constituent
This contact information has been verified

1

FORM LETTER C-346: SUNNIE SKILES

Response to Comment C-346-1

Please see Master Response 1.

From: SUNNIE SKILES <myvoice@oneclickpolitics.com>
Sent: Monday, March 21, 2022 1:03 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-347

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-347-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SUNNIE SKILES
sskiles@proyouth.net
727 Quail Haven Rd Colfax, CA 95713 Constituent
This contact information has been verified

1

FORM LETTER C-347: SUNNIE SKILES

Response to Comment C-347-1

Please see Master Response 1.

Form Letter C-348

From: susan a jueck
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 3:52:42 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-348-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156, PO Box 156 Rough and Ready, CA 95975

FORM LETTER C-348: SUSAN A. JUECK

Response to Comment C-348-1

Please see Master Response 1.

Form Letter C-349

From: susan a jueck
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Saturday, January 29, 2022 7:44:12 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-349-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156, PO Box 156 Rough and Ready, CA 95975

FORM LETTER C-349: SUSAN A. JUECK

Response to Comment C-349-1

Please see Master Response 1.

Form Letter C-350

From: susan a jueck
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-350-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156 rough and ready, CA 95975

FORM LETTER C-350: SUSAN A. JUECK

Response to Comment C-350-1

Please see Master Response 1.

Form Letter C-351

From: susan a jueck
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:14 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-351-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156 rough and ready, CA 95975

FORM LETTER C-351: SUSAN A. JUECK

Response to Comment C-351-1

Please see Master Response 1.

Form Letter C-352

From: susan a jueck <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 3:53 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-352-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156, PO Box 156 Rough and Ready, CA 95975

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FORM LETTER C-352: SUSAN A. JUECK

Response to Comment C-352-1

Please see Master Response 1.

Form Letter C-353

From: susan a jueck <myvoice@oneclickpolitics.com>
Sent: Saturday, January 29, 2022 7:44 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-353-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156, PO Box 156 Rough and Ready, CA 95975

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FORM LETTER C-353: SUSAN A. JUECK

Response to Comment C-353-1

Please see Master Response 1.

Form Letter C-354

From: susan a jueck <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 3:53 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-354-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156, PO Box 156 Rough and Ready, CA 95975

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FORM LETTER C-354: SUSAN A. JUECK

Response to Comment C-354-1

Please see Master Response 1.

Form Letter C-355

From: susan a jueck
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:15 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-355-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
susan a jueck
susanj477@att.net
14989 stagecoach way, PO Box 156 rough and ready, CA 95975 Constituent

FORM LETTER C-355: SUSAN A. JUECK

Response to Comment C-355-1

Please see Master Response 1.

Form Letter C-356

From: Suzanne A King
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 13, 2022 2:06:15 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-356-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Suzanne A King
shortsassylass@yahoo.com
10175 Grinding Rock Drive CA - Grass Valley, CA 95949

FORM LETTER C-356: SUZANNE A. KING

Response to Comment C-356-1

Please see Master Response 1.

Form Letter C-357

From: Suzanne A King
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Thursday, January 13, 2022 2:06:15 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-357-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Suzanne A King
shortsassylass@yahoo.com
10175 Grinding Rock Drive CA - Grass Valley, CA 95949

FORM LETTER C-357: SUZANNE A. KING

Response to Comment C-357-1

Please see Master Response 1.

Form Letter C-358

From: Suzanne A King <myvoice@oneclickpolitics.com>
Sent: Thursday, January 13, 2022 2:06 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-358-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Suzanne A King
shortsassylass@yahoo.com
10175 Grinding Rock Drive CA - Grass Valley, CA 95949

1

FORM LETTER C-358: SUZANNE A. KING

Response to Comment C-358-1

Please see Master Response 1.

Form Letter C-359

From: Tamar Brinkman
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:05 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-359-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tamar Brinkman
tbrinkman.peng@gmail.com
12816 Jones Bar Road NEVADA CITY, CA 95959

FORM LETTER C-359: TAMAR BRINKMAN

Response to Comment C-359-1

Please see Master Response 1.

Form Letter C-360

From: Tamar Brinkman
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:06 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-360-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tamar Brinkman
tbrinkman.peng@gmail.com
12816 Jones Bar Road NEVADA CITY, CA 95959 Constituent

FORM LETTER C-360: TAMAR BRINKMAN

Response to Comment C-360-1

Please see Master Response 1.

Form Letter C-361

From: Tamar Brinkman <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-361-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tamar Brinkman
tbrinkman.peng@gmail.com
12816 Jones Bar Road NEVADA CITY, CA 95959

1

FORM LETTER C-361: TAMAR BRINKMAN

Response to Comment C-361-1

Please see Master Response 1.

Form Letter C-362

From: Test Person
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, February 15, 2022 1:17:24 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-362-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Test Person
nsteward@oneclickpolitics.com
709 Borchard Ct Woodland, CA 95695 Constituent
This contact information has been verified

FORM LETTER C-362: N. STEWARD

Response to Comment C-362-1

Please see Master Response 1.

Form Letter C-363

From: Thomas D Amesbury
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:12 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-363-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Thomas D Amesbury
tom@forco-op.com
415 Colfax Ave, 415 Colfax Ave Grass Valley, CA 95945

FORM LETTER C-363: THOMAS D. AMESBURY

Response to Comment C-363-1

Please see Master Response 1.

Form Letter C-364

From: Thomas D Amesbury
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:10 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-364-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Thomas D Amesbury
tom@forco-op.com
415 Colfax Ave, 415 Colfax Ave Grass Valley, CA 95945 Constituent

FORM LETTER C-364: THOMAS D. AMESBURY

Response to Comment C-364-1

Please see Master Response 1.

Form Letter C-365

From: Thomas D Amesbury <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-365-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Thomas D Amesbury
tom@forco-op.com
415 Colfax Ave, 415 Colfax Ave Grass Valley, CA 95945

1

FORM LETTER C-365: THOMAS D. AMESBURY

Response to Comment C-365-1

Please see Master Response 1.

Form Letter C-366

From: Thomas Kitchar
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:54 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-366-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Thomas Kitchar
mythicalmining@cavenet.com
P.O. Box 1371 Cave Junction, OR 97523

FORM LETTER C-366: THOMAS KITCHAR

Response to Comment C-366-1

Please see Master Response 1.

Form Letter C-367

From: Thomas Kitchar <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-367-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Thomas Kitchar
mythicalmining@cavenet.com
P.O. Box 1371 Cave Junction, OR 97523

1

FORM LETTER C-367: THOMAS KITCHAR

Response to Comment C-367-1

Please see Master Response 1.

Form Letter C-368

From: Tim McShane
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-368-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tim McShane
tmcshane@yahoo.com
23793 Lakeview Ct Auburn, CA 95602

FORM LETTER C-368: TIM MCSHANE

Response to Comment C-368-1

Please see Master Response 1.

Form Letter C-369

From: Tim McShane
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:27:16 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-369-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tim McShane
tmcshane@yahoo.com
23793 Lakeview Ct Auburn, CA 95602 Constituent

FORM LETTER C-369: TIM MCSHANE

Response to Comment C-369-1

Please see Master Response 1.

Form Letter C-370

From: Tim McShane <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:27 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-370-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tim McShane
tmcshane@yahoo.com
23793 Lakeview Ct Auburn, CA 95602

1

FORM LETTER C-370: TIM MCSHANE

Response to Comment C-370-1

Please see Master Response 1.

Form Letter C-371

From: Tom Andersen
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:11:11 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-371-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom Andersen
juliejez@comcast.net
420 Main St Nevada City, CA 95959

FORM LETTER C-371: TOM ANDERSON

Response to Comment C-371-1

Please see Master Response 1.

Form Letter C-372

From: Tom Andersen
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 4:11:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-372-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom Andersen
juliejez@comcast.net
420 Main St Nevada City, CA 95959

FORM LETTER C-372: TOM ANDERSON

Response to Comment C-372-1

Please see Master Response 1.

Form Letter C-373

From: Tom Andersen <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 4:11 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-373-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom Andersen
juliejez@comcast.net
420 Main St Nevada City, CA 95959

1

FORM LETTER C-373: TOM ANDERSON

Response to Comment C-373-1

Please see Master Response 1.

Form Letter C-374

From: Tom R Jacobson
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Tuesday, January 4, 2022 10:43:03 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-374-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom R Jacobson
tomjacobson63@gmail.com
15053, Arrowhead Lane Grass Valley, CA 95945

FORM LETTER C-374: TOM R. JACOBSON

Response to Comment C-374-1

Please see Master Response 1.

Form Letter C-375

From: Tom R Jacobson <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 10:43 AM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-375-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom R Jacobson
tomjacobson63@gmail.com
15053, Arrowhead Lane Grass Valley, CA 95945

1

FORM LETTER C-375: TOM ANDERSON

Response to Comment C-375-1

Please see Master Response 1.

Form Letter C-376

From: Tom R Jacobson <myvoice@oneclickpolitics.com>
Sent: Tuesday, January 4, 2022 10:43 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-376-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Tom R Jacobson
tomjacobson63@gmail.com
15053, Arrowhead Lane Grass Valley, CA 95945

1

FORM LETTER C-376: TOM ANDERSON

Response to Comment C-376-1

Please see Master Response 1.

Form Letter C-377

From: Walter Snook
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 5:28:57 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-377-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Walter Snook
wsnook@gmail.com
13246 La Barr Meadows Rd, Grass Valley CA Grass Valley, CA 95949

FORM LETTER C-377: WALTER SNOOK

Response to Comment C-377-1

Please see Master Response 1.

Form Letter C-378

From: Walter Snook
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 5:28:34 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-378-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Walter Snook
wsnook@gmail.com
13246 La Barr Meadows Rd, Grass Valley CA Grass Valley, CA 95949

FORM LETTER C-378: WALTER SNOOK

Response to Comment C-378-1

Please see Master Response 1.

Form Letter C-379

From: Walter Snook <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 5:29 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-379-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Walter Snook
wsnook@gmail.com
13246 La Barr Meadows Rd, Grass Valley CA Grass Valley, CA 95949

1

FORM LETTER C-379: WALTER SNOOK

Response to Comment C-379-1

Please see Master Response 1.

Form Letter C-380

From: Wes Hawkins
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:02 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-380-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wes Hawkins
whauhunter@gmail.com
13322 Elderberry Ln. Grass Valley, CA 95945

FORM LETTER C-380: WES HAWKINS

Response to Comment C-380-1

Please see Master Response 1.

Form Letter C-381

From: Wes Hawkins
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:03 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-381-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wes Hawkins
whauhunter@gmail.com
13322 Elderberry Ln. Grass Valley, CA 95945 Constituent

FORM LETTER C-381: WES HAWKINS

Response to Comment C-381-1

Please see Master Response 1.

Form Letter C-382

From: Wes Hawkins <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-382-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wes Hawkins
whauhunter@gmail.com
13322 Elderberry Ln. Grass Valley, CA 95945

1

FORM LETTER C-382: WES HAWKINS

Response to Comment C-382-1

Please see Master Response 1.

Form Letter C-383

From: William Allsop
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 3:17:48 PM

Dist 2

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-383-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
William Allsop
hisierra1@yahoo.com
17910 vintage dr Grass valley, CA 95949

FORM LETTER C-383: WILLIAM ALSOP

Response to Comment C-383-1

Please see Master Response 1.

Form Letter C-384

From: William Allsop
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, January 28, 2022 3:17:49 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-384-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
William Allsop
hisierra1@yahoo.com
17910 vintage dr Grass valley, CA 95949

FORM LETTER C-384: WILLIAM ALSOP

Response to Comment C-384-1

Please see Master Response 1.

Form Letter C-385

From: William Allsop <myvoice@oneclickpolitics.com>
Sent: Friday, January 28, 2022 3:18 PM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-385-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
William Allsop
hisierra1@yahoo.com
17910 vintage dr Grass valley, CA 95949

1

FORM LETTER C-385: WILLIAM ALSOP

Response to Comment C-385-1

Please see Master Response 1.

Form Letter C-386

From: Wilton Fryer
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:32:12 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-386-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Lane Smartsville, CA 95977

FORM LETTER C-386: WILTON FRYER

Response to Comment C-386-1

Please see Master Response 1.

Form Letter C-387

From: Wilton Fryer
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:06 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-387-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Ln Smartsville, CA 95977

FORM LETTER C-387: WILTON FRYER

Response to Comment C-387-1

Please see Master Response 1.

Form Letter C-388

From: Wilton Fryer
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Friday, February 11, 2022 8:28:06 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

C-388-1

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Ln Smartsville, CA 95977

FORM LETTER C-388: WILTON FRYER

Response to Comment C-388-1

Please see Master Response 1.

Form Letter C-389

From: Wilton Fryer
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Wednesday, January 12, 2022 7:32:11 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-389-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Lane Smartsville, CA 95977

FORM LETTER C-389: WILTON FRYER

Response to Comment C-389-1

Please see Master Response 1.

Form Letter C-390

From: Wilton Fryer <myvoice@oneclickpolitics.com>
Sent: Wednesday, January 12, 2022 7:32 PM
To: Planning
Subject: I support the re-opening of the Idaho-Maryland Mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Planning Commissioners County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-390-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Lane Smartsville, CA 95977

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FORM LETTER C-390: WILTON FRYER

Response to Comment C-390-1

Please see Master Response 1.

From: Wilton Fryer <myvoice@oneclickpolitics.com>
Sent: Friday, February 11, 2022 8:28 AM
To: Matt Kelley
Subject: I support the re-opening of the Idaho-Maryland Mine

Form Letter C-391

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Re: I support the re-opening of the Idaho-Maryland Mine

Dear Mr. Kelley,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

C-391-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 600 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
Wilton Fryer
barwf@hotmail.com
10814 Red Ln Smartsville, CA 95977 Constituent

1

FORM LETTER C-391: WILTON FRYER

Response to Comment C-391-1

Please see Master Response 1.

Form Letter D 1

Dist 3

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3-7-22

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

My business's opposition to this project is based on RYES plans, reports and the DEIR (Draft Environmental Impact Report). Experts have reported to me that there will be significant increases in air pollution, traffic in key areas, noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources, etc. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs to the County workforce of approximately 44,000 is trivial no matter what the wages, and well-paying jobs will not go to County residents.

D 1-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Native Oven

Individual Name: Aldo

Address:
125 Mill St.

Phone number:

Email:

FORM LETTER D 1: ALDO

Response to Comment D 1-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 2

RECEIVED

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 4

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 2-1

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Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Alyssa Rurup

Business Name: Spring Hill PT

Individual Name: Alyssa Rurup

Address: 19541 Chaparral Cir.
Penn Valley, CA 95946

Phone number: 530-274-2320

Email:

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 2: ALYSSA RURUP

Response to Comment D 2-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 3

RECEIVED

MAR 2 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

Date:

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 3-1

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Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name:

Individual Name: April Durham

Address: 142 Lidster Ave G.V. CA 95945

Phone number: 3056482921

Email:

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 3: APRIL DUNHAM

Response to Comment D 3-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 4

Cannot identify Dist

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3/18/21

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 4-1

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Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Spring Hill Physical Therapy
Individual Name: C TAYLOR
Address: 300 Sierra College Dr #165
Grass Valley CA 95945
Phone number: 530 274 2320
Email: INFO@springhillpt.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 4: C. TAYLOR

Response to Comment D 4-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 5

Cannot identify Dist RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

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D 5-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name:

Individual Name:

Address:

Phone number: 973 931 3610

Email: C.corasaniti@gmail.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 5: CAROLINE CORASANITI

Response to Comment D 5-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 6

Dist 4

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-7-22

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

My business's opposition to this project is based on RYES plans, reports and the DEIR (Draft Environmental Impact Report). Experts have reported to me that there will be significant increases in air pollution, traffic in key areas, noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources, etc. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs to the County workforce of approximately 44,000 is trivial no matter what the wages, and well-paying jobs will not go to County residents.

D 6-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Inner Travel Books
Individual Name: Colleen Heater
Address: 14618 Tyler Foote Rd, 171
Nevada City, CA 95959
Phone number: 530 478-7792
Email: colleenheater@gmail.com

FORM LETTER D 6: COLLEEN HEATER

Response to Comment D 6-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 7

RECEIVED

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

09 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: March 7, 2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

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D 7-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

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Sincerely,

Corey Vanderwouw

Business Name: Fit for Life physical therapy

Individual Name: Corey Vanderwouw

Address: 10802 Arrow Point Pl.
Grass Valley, CA 95949

Phone number: 650 465-1016

Email: corey@thrivencpt.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 7: COREY VANDERWOULD

Response to Comment D 7-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 8

Dist 3

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: MAR 07 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

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D 8-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Art Works Gallery

Individual Name: Dori Greenbaum

Address: 113 Mill Street

Phone number: 530 559-7117

Email: dorigrbm@gmail.com

FORM LETTER D 8: DORI GREENBAUM

Response to Comment D 8-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 9

Dist 1

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3-17-22

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

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D 9-1

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Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name:

Individual Name: Julie L. Kane (Julie L. Kane)

Address: P.O. Box 2316
GV Ca 95945 / 11425 Ridge Rd.
Nv City Ca 95959

Phone number:

Email: julielynnkane@gmail.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 9: JULIE KANE

Response to Comment D 9-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 10

RECEIVED

MAR 2 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Cannot identify Dist

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-11-2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I ~~work~~/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

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D 10-1

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Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Spring Hill Physical Therapy

Individual Name: Marion Gilbert

Address: 300 Sierra College Dr. #105
Grass Valley, CA 95945

Phone number: 530-274-2320

Email: marion@springhillpt.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 10: MARION GILBERT

Response to Comment D 10-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

With regard to noise, please refer to Impacts 4.10-1 through 4.10-3 in Chapter 4.10, Noise and Vibration, of the DEIR, which provide a detailed analysis of whether the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impact 4.10-4 in Chapter 4.10, Noise and Vibration, of the DEIR, provides a detailed analysis of whether the project would generate excessive groundbourne vibration or groundborne noise levels.

Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 11

Dist 1

RECEIVED

MAR 09 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: March 4, 2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I ~~work/own a business~~ live in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

My ~~business's~~ personal opposition to this project is based on RYES plans, reports and the DEIR (Draft Environmental Impact Report). Experts have reported to me that there will be significant increases in air pollution, traffic in key areas, noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources, etc. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs to the County workforce of approximately 44,000 is trivial no matter what the wages, and well-paying jobs will not go to County residents.

D 11-1

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Sincerely,

Susan Hollon

Business Name:

Individual Name: Susan Hollon

Address: P.O. Box 224
Grass Valley, Ca. 95945

Phone number: 530-305-5216

Email: suschia@gmail.com

FORM LETTER D 11: SUSAN HOLLON

Response to Comment D 11-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Form Letter D 12

Dist 1

RECEIVED

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Date: 3-10-2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 12-1

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Sincerely,

Business Name: Spring Hill Physical Therapy

Individual Name: Thira Gilbert

Address: 300 Sierra College Dr. #105
Grass Valley, CA 95945

Phone number: 530-274-2320

Email: thira@springhillpt.com

Cc: Nevada County Planning Commission (Suite 170)

FORM LETTER D 12: THIRA GILBERT

Response to Comment D 12-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Form Letter D 13

RECEIVED

MAR 2 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date:

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I work/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 13-1

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Sincerely,

Business Name:

Individual Name: Tiffany Brunello

Address: 221 Glenbrook dr Grass Valley Ca 95945

Phone number: 530 301 8525

Email:

FORM LETTER D 13: TIFFANY BRUNELLO

Response to Comment D 13-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Form Letter D 14

Dist 3

RECEIVED
MAR 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3/6/22

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

I ~~work~~/own a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

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D 14-1

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Native Wren
Individual Name: Wynne Kohler
Address: 125 Mill st grass Valley

Phone number:
Email: info@nativewrenca.com

FORM LETTER D 14: WRYNNE KOHLER

Response to Comment D 14-1

Please see Master Response 1 regarding non-EIR issues, Master Response 2 regarding social and economic impacts, Master Response 5 regarding evacuation zones, Master Response 6 regarding wildfire impacts, Master Response 14 regarding adequacy of the groundwater model, and Master Response 15 regarding adequacy of the groundwater monitoring and mitigation.

In addition, with regard to air quality impacts, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, which provides a detailed analysis of air quality impacts associated with the proposed project.

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Furthermore, please refer to Chapter 4.12, Transportation, of the DEIR, for a detailed analysis of the project's transportation effects on the surrounding roadway system.

Support Card 1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 1-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Daran + Shelly Hill

Address 13488 Bellew Dr Nevada ZIP 95959

Phone 265-5090

Email Address

SUPPORT CARD 1: AARON AND SHELLY HILL

Response to Comment Sup 1-1

Please see Master Response 1.

Support Card 2

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 2-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Aaron Hall

Address 13488 Bellum Dr ZIP 95959

Phone 530-265-5090

Email Address

SUPPORT CARD 2: AARON HILL

Response to Comment Sup 2-1

Please see Master Response 1.

Support Card 3

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup-3-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Aaron & Norma McIntyre

Address 24942 Rodeo Flat Rd., Auburn ZIP 95602

Phone

Email Address

SUPPORT CARD 3: AARON AND NORMA MCINTYRE

Response to Comment Sup 3-1

Please see Master Response 1.

Support Card 4

Sup 4-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) [illegible]

Address 135 1st St GV ZIP 95945

Phone [illegible]

Email Address

SUPPORT CARD 4: ABELI

Response to Comment Sup 4-1

Please see Master Response 1.

Support Card 5

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 5-1

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Name(s) Addison Kramer

Address 219 S. School St., Apt 2 ZIP 95945

Phone 530-210-1373

Email Address arkhedgehog@gmail.com

SUPPORT CARD 5: ADDISON KRAMER

Response to Comment Sup 5-1

Please see Master Response 1.

Support Card 6

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 6-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Al & Sandy Mader

Address P.O Box 245 · Rough & Ready ZIP 95975

Phone 530-277-6074

Email Address AlMader172@gmail.com

SUPPORT CARD 6: AL AND SANDY MADER

Response to Comment Sup 6-1

Please see Master Response 1.

Support Card 7

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 7-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) AL & MARYLOU REICHMUTH

Address 12600 WANDERER RD ZIP 95602

~~Phone~~ AUBURN, CA

~~Email Address~~

SUPPORT CARD 7: AL AND MARYLOU REICHMUTH

Response to Comment Sup 7-1

Please see Master Response 1.

Support Card 8

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 8-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ALAN CORCORAN

Address 10348 RED HILL ZIP 95977

~~Phone~~ SMARTVILLE, CA

~~Email Address~~ 530-913-8894

SUPPORT CARD 8: ALAN CONCORAN

Response to Comment Sup 8-1

Please see Master Response 1.

Support Card 9

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 9-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) AIAN EAGLETON

Address 16600 BASS LANE NC. ZIP 95959

Phone CELL (530) 559-1603

Email Address AIANEAGLETONKAYLE@GMAIL.COM

SUPPORT CARD 9: ALAN EAGLETON

Response to Comment Sup 9-1

Please see Master Response 1.

Support Card 10

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 10-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Albert Nuijens and Carrie Highfill

Address P.O. Box 1091 Nevada City, ZIP CA 95959

Phone (530) 615-4469

Email Address CJohighfill@yahoo.com

SUPPORT CARD 10: ALBERT NUIJENS AND CARRIE HIGHFILL

Response to Comment Sup 10-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine. **Support Card 11**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 11-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ALEXANDER EAGLE

Address 11809 MARION DR ZIP 95959

Phone (408) 656-9188

Email Address AEAGLE3@GMAIL.COM

SUPPORT CARD 11: ALEXANDER EAGLE

Response to Comment Sup 11-1

Please see Master Response 1.

Support Card 12

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 12-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Mr. Alexander Owens
19336 Chaparral Cir
Penn Valley, CA 95946

SUPPORT CARD 12: ALEXANDER OWENS

Response to Comment Sup 12-1

Please see Master Response 1.

Support Card 13

I support re-opening the Idaho-Maryland Mine. 100 %

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 13-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Alfred P. Bulf

Address 11482 Ridge Road ZIP 95959

Phone (530) 470-0849

Email Address Alfred.Bulf@Gmail.com

SUPPORT CARD 13: ALFRED P. BULF

Response to Comment Sup 13-1

Please see Master Response 1.

Support Card 14

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 14-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Allen + SHERi RAMSey

Address 18615 Siesta DR Penn Valley ZIP 95946

Phone 530-360-4313

Email Address Sherikakes@ymail.com

SUPPORT CARD 14: ALLEN AND SHERI RAMSEY

Response to Comment Sup 14-1

Please see Master Response 1.

Support Card 15

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 15-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Donna-Lynn Hunbar

Address 12684 Butterfly Wy. N.C. ZIP 95959

Phone 530-273-4576

Email Address don't have one

SUPPORT CARD 15: ALONNA-LYNN ALUNBAR

Response to Comment Sup 15-1

Please see Master Response 1.

Support Card 16

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 16-1

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Name(s) AMOS & BEVERLY SEGHEZZI

Address 456 SO AUBURN ST. ZIP 95945

Phone 530-477-8552 913-8345

Email Address SEGHEZZI @ AOL.COM

SUPPORT CARD 16: AMOS AND BEVERLY SEGHEZZI

Response to Comment Sup 16-1

Please see Master Response 1.

Support Card 17

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 17-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BEVERLY & AMOS P SEGHEZZI

Address 456 SO AUBURN ST. G.V. ZIP 95945

Phone 530-477-8552 CELL 530-913-8345

Email Address SEGHEZZI @ AOL.COM

SUPPORT CARD 17: AMOS AND BEVERLY SEGHEZZI

Response to Comment Sup 17-1

Please see Master Response 1.

Support Card 18

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 18-1

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Name(s) Lou Linnet & Andre Lubarsky

Address 10069 Linnet Lane, Auburn ZIP 95602

Phone 530-269-0288

Email Address loulinnet@gmail.com

SUPPORT CARD 18: ANDRE LUBARSKY

Response to Comment Sup 18-1

Please see Master Response 1.

Support Card 19

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 19-1

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Name(s) ANDREA HARRIS

Address 14205 QUAKER HILL X RD ZIP 95959

Phone 916-847-4202

Email Address

SUPPORT CARD 19: ANDREA HARRIS

Response to Comment Sup 19-1

Please see Master Response 1.

Support Card 20

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 20-1

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Name(s) Andrew Hinz

Address 11050 Meyer Way ZIP 95949

Phone 530 755 6128

Email Address AFHINZ@Suddenlink.Net

SUPPORT CARD 20: ANDREW HINZ

Response to Comment Sup 20-1

Please see Master Response 1.

Support Card 21

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 21-1

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Name(s) Andrew M. Kuhnmuench III

Address 11341 Dorchester Dr. ZIP 96161

Phone (530) 448-6903

Email Address akuhnmuench@gmail.com

SUPPORT CARD 21: ANDREW M. KUHNMUENCH

Response to Comment Sup 21-1

Please see Master Response 1.

Support Card 22

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 22-1

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Name(s) Andrew M. Kuhnmuench

Address 11341 Dorchester Drive ZIP 96161

Phone —

Email Address akuhnmuench@gmail.com

SUPPORT CARD 22: ANDREW M. KUHMUENCH

Response to Comment Sup 22-1

Please see Master Response 1.

Support Card 23

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 23-1

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Name(s) Andrew Rust

Address 325 Idaho St Apt 3 ZIP 95945

Phone 530-557-7787

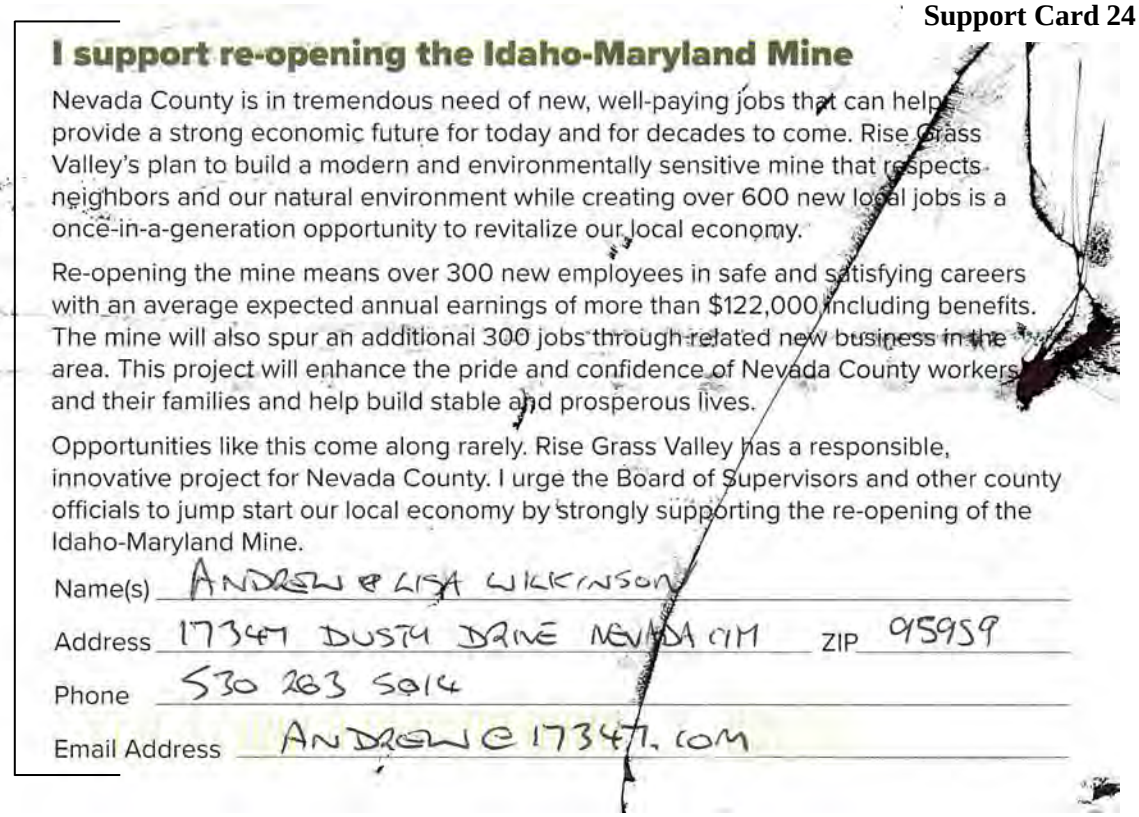
Email Address rustyv1001@gmail.com

SUPPORT CARD 23: ANDREW RUST

Response to Comment Sup 23-1

Please see Master Response 1.

Support Card 24



I support re-opening the Idaho-Maryland Mine

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Sup 24-1

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Name(s) ANDREW & LISA WILKINSON

Address 17347 DUSTY DRIVE NEVADA CITY ZIP 95959

Phone 530 263 5014

Email Address ANDREW@17347.COM

SUPPORT CARD 24: ANDREW AND LISA WILKINSON

Response to Comment Sup 24-1

Please see Master Response 1.

Support Card 25

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 25-1

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Name(s) ANDY CASSANO

P.O. BOX 700, CEDAR RIDGE CA ZIP 95924

*nevadacityengineering.com

SUPPORT CARD 25: ANDY CASSANO

Response to Comment Sup 25-1

Please see Master Response 1.

Support Card 26

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 26-1

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Name(s) Angus Mackay

Address 11101 Ringtail Road, Penn Valley, CA ZIP 95946

Phone

Email Address amackay43@gmail.com

SUPPORT CARD 26: ANGUS MACKAY

Response to Comment Sup 26-1

Please see Master Response 1.

Support Card 27

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 27-1

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Name(s) JOSEPH BERGERON & ANNA MARIE MANSFIELD

Address 524 ST PATRICKS DR. ZIP 95945

Phone (530) 446-4316

Email Address N/A

SUPPORT CARD 27: ANNA MARIE MANSFIELD AND JOESPH BERGERON

Response to Comment Sup 27-1

Please see Master Response 1.

Support Card 28

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 28-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ANTHONY & SYDNEY DOMSCHOT

Address 18613 N. CHERRY CREEK ROAD, GRASS VALLEY ZIP 95949

Phone

Email Address PILOTRACER2000@YAHOO.COM

SUPPORT CARD 28: ANTHONY AND SYDNEY DOMSCHOT

Response to Comment Sup 28-1

Please see Master Response 1.

Support Card 29

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 29-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) April Pfeifer

Address 14559 Colfax Hwy, GV ZIP 95945

Phone (530) 575-8687

Email Address apfeifer@live.com

SUPPORT CARD 29: APRIL PFEILER

Response to Comment Sup 29-1

Please see Master Response 1.

Support Card 30

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 30-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Arlene L Treadwell

Address 10044 West Dr Grass Valley CA ZIP 95945

Phone ~~916~~ 530 2198

Email Address none

SUPPORT CARD 30: ARLENE P. TREVETHICK

Response to Comment Sup 30-1

Please see Master Response 1.

Support Card 31

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 31-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Arlene P. Trevethick

Address 10044 West Dr ZIP 95945

Phone 530 273-2798

Email Address

SUPPORT CARD 31: ARLENE P. TREVETHICK

Response to Comment Sup 31-1

Please see Master Response 1.

Support Card 32

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 32-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Arlene Parks Travelstead

Address 10044 West Dr Grass Valley ZIP CA 95945

Phone 530-273-2798

Email Address name

Granddaughter of a miner!

SUPPORT CARD 32: ARLENE P. TREVETHICK

Response to Comment Sup 32-1

Please see Master Response 1.

Support Card 33

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 33-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Glenn Ward & Arletha Richardson

Address 10044 Crestview dr. ZIP 95949

Phone 916-470-2626 & 530-922-7172

Email Address Wardglenn316@gmail.com & richaieshagle bal.net

SUPPORT CARD 33: ARLETHA RICHARDSON AND GLEN WARD

Response to Comment Sup 33-1

Please see Master Response 1.

Support Card 34

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 34-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Art & Karen Mennick

Address 13009 Torrey Pines Dr. Auburn, Ca. 95602 ZIP

Phone 530-268-1721

Email Address ARTMENNKY@YAHOO.COM

SUPPORT CARD 34: ART AND KAREN MENNICK

Response to Comment Sup 34-1

Please see Master Response 1.

Support Card 35

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 35-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Art Shade

Business Art Shade Construction Ph 650 222 6831

Address 13003 Sunshine Valley Road GV ZIP 95945

Email Address ArtShadeCo@Gmail.com

SACRAMENTO CA 23 DEC 2022 PM 3 L

SUPPORT CARD 35: ARTSHADE CONSTRUCTION

Response to Comment Sup 35-1

Please see Master Response 1.

Support Card 36

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 36-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) B. Montanya

Address P.O. Box 385 CHICAGO PK. CA ZIP 95712

Phone

Email Address NONE

SUPPORT CARD 36: B. MONTANYA

Response to Comment Sup 36-1

Please see Master Response 1.

Support Card 37

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 37-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) T. Trathen + B. Wiederhold

Address 14071 Tahoe View Dr. GV ZIP 95945

Phone

Email Address

SUPPORT CARD 37: B. WIEDERHOLD

Response to Comment Sup 37-1

Please see Master Response 1.

Support Card 38

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 38-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) B&M Realty, LLC

Address 500 Benett Street ZIP 95945

Phone 530.492.2119

Email Address

SUPPORT CARD 38: BAM REALTY, LLC

Response to Comment Sup 38-1

Please see Master Response 1.

Support Card 39

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 39-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BARBARA HALL

Address 23141 BRIAN LN. G.V. CA. ZIP 95949

Phone 530-652-5052

Email Address NONE

SUPPORT CARD 39: BARBARA HALL

Response to Comment Sup 39-1

Please see Master Response 1.

Support Card 40

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 40-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barbara D. Kay et.

Address 20245 East Lonsdale Dr ZIP 95945

Phone 1-530-575-0174

Email Address None

SUPPORT CARD 40: BARBARA D. KAY

Response to Comment Sup 40-1

Please see Master Response 1.

Support Card 41

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 41-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barbara Kelley

Address 841 Old Tunnel Rd. #3 G.V. ZIP 95945

Phone 530-205-9026

Email Address none

SUPPORT CARD 41: BARBARA KELLEY

Response to Comment Sup 41-1

Please see Master Response 1.

Support Card 42

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 42-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE KILNER BARBARA LAUDERDALE

Address 13449 RED DOG ROAD N.C. ZIP 95959

Phone 530-478-5806

Email Address GEORGEKILNER@COMCAST.NET.

SUPPORT CARD 42: BARBARA LAUDERDALE

Response to Comment Sup 42-1

Please see Master Response 1.

Support Card 43

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 43-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE KILNER BARBARA LAUDERDALE

Address 13449 RED DOG ROAD N.C. ZIP 95959

Phone 530 478 5806

Email Address GEORGEKILNER@COMCAST.NET

SUPPORT CARD 43: BARBARA LAUDERDALE

Response to Comment Sup 43-1

Please see Master Response 1.

Support Card 44

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 44-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BARBARA A. PERRY

Address 115 UNION JACK ST Apt 13 ZIP 95945

Phone

Email Address

SUPPORT CARD 44: BARBARA A. PERRY

Response to Comment Sup 44-1

Please see Master Response 1.

Support Card 45

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 45-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BARBARA + Eric Reamer

Address P.O. Box 10019 Truckee, Ca ZIP 96162

Phone 530-412-1003

Email Address breamer@sbcglobal.net

SUPPORT CARD 45: BARBARA AND ERIC REAMER

Response to Comment Sup 45-1

Please see Master Response 1.

Support Card 46

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 46-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barbara Schumacher

Address 10111 Newtown Rd Nevada City CA ZIP 95959

Phone 530-265-6777

Email Address None

SUPPORT CARD 46: BARBARA SCHUMACHER

Response to Comment Sup 46-1

Please see Master Response 1.

Support Card 47

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 47-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barry Lowery

Address 14167 Owl Creek Rd ZIP

Nevada City, CA 95959

Phone

Email Address

SUPPORT CARD 47: BARRY LOWERY

Response to Comment Sup 47-1

Please see Master Response 1.

Support Card 48

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 48-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BARRY MINGST

Address 10370 BOULDER ST, NC ZIP 95959

Phone 530-264-6055

Email Address barry.mingst@gmail.com

SUPPORT CARD 48: BARRY MINGST

Response to Comment Sup 48-1

Please see Master Response 1.

Support Card 49

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 49-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Beau & Monet Huisteeg

Address 24175 Timber Ridge Dr. ZIP 95602

Phone (530) 308-2483

Email Address beauhuisteeg@gmail.com

SUPPORT CARD 49: BEAU AND MONET HUISKENS

Response to Comment Sup 49-1

Please see Master Response 1.

Support Card 50

Sup 50-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DARYL BAIRD / BECKY KIDDER

Address 25241 CHINA HOLLOW RD ZIP 95602

Phone

Email Address ESSDARYL@GMAIL.COM

SUPPORT CARD 50: BECKEY KIDDER

Response to Comment Sup 50-1

Please see Master Response 1.

Support Card 51

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 51-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. Ben worked for the Yuba Placer Gold Company for over 25 years.

Name(s) Ben + Barbara Coleman

Address 12521 LaBarr Meadows Road ZIP 95949

Phone 530 273-5908

Email Address benbarbc@pacbell.net

SUPPORT CARD 51: BEN COLEMAN

Response to Comment Sup 51-1

Please see Master Response 1.

Support Card 52

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 52-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ben + Jenifer Joiner

Address PO Box 3509, Grass Valley, CA ZIP 95945

Phone

Email Address

SUPPORT CARD 52: BEN JOINER

Response to Comment Sup 52-1

Please see Master Response 1.

Support Card 53

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 53-1

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Name(s) Ben Kaplan, Asa Kaplan, Michelle Jackson

Address 14365 Sugardust ln ZIP 95949

Phone (916)-742-7062

Email Address Bkaplan8227@yahoo.com

SUPPORT CARD 53: BEN KAPLAN

Response to Comment Sup 53-1

Please see Master Response 1.

Support Card 54

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 54-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barbara Coleman Ben Coleman

Address 12521 La Barr Meadows Road ZIP 95949

Phone 530-273-5908

Email Address benbarbc@pacbell.net

SUPPORT CARD 54: BEN COLEMAN

Response to Comment Sup 54-1

Please see Master Response 1.

Support Card 55

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 55-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ben Kaplan

Address 14365 Sugar Dust Ln. ZIP Grass Valley, CA 95949

Phone

Email Address BKaplan8227@yahoo.com

SUPPORT CARD 55: BEN KAPLAN

Response to Comment Sup 55-1

Please see Master Response 1.

Support Card 56

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 56-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ben & Leah Veblen

Address 11991 Francis Dr. ZIP 95949

Phone 530-305-8705

Email Address WEBLEN@LIVE.COM

SUPPORT CARD 56: BEN VEBLEN

Response to Comment Sup 56-1

Please see Master Response 1.

Support Card 57

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 57-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bernadette Jaeger

Address 119 Arden Court ZIP 95945

Phone 530-802-5048

Email Address BernadetteWain2@yahoo.com

SUPPORT CARD 57: BERNADETTE JAEGER

Response to Comment Sup 57-1

Please see Master Response 1.

Support Card 58

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 58-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kennedy L Marti Bernice Owczarzak

Address 14625 Torrey Pines Drive ZIP 95602

Auburn, CA

Phone 916 508 8834

Email Address krmartidds@hotmail.com

SUPPORT CARD 58: BERNICE OWCZERZAK

Response to Comment Sup 58-1

Please see Master Response 1.

Support Card 59

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 59-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bethany DenKers and Byron Jones

Address 963 Morgan Ranch Drive, GV, CA ZIP 95945

Phone 530-559-7814

Email Address backthebluenevadacounty@gmail.com

SUPPORT CARD 59: BETHANY DENKERS

Response to Comment Sup 59-1

Please see Master Response 1.

Support Card 60

Sup 60-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(

Addres ZIP

Phone

Email Address

Ms. Betti A. Taormina
10279 Dalewood Way
Grass Valley, CA 95949-9156

SUPPORT CARD 60: BETTI A. TAORMINA

Response to Comment Sup 60-1

Please see Master Response 1.

Support Card 61

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 61-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bettie A Ferry

Address 131 Eureka Street #208 ZIP 95945

Phone (530) 205-9890

Email Address N/A

SUPPORT CARD 61: BETTY A. FERRY

Response to Comment Sup 61-1

Please see Master Response 1.

Support Card 62

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 62-1

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Name(s) Betty Maddox

Address 11591 Lower Pine Hill Dr ZIP 95945

Phone 530-273-6589

Email Address —

I Do Support OPENING

SUPPORT CARD 62: BETTY MADDOY

Response to Comment Sup 62-1

Please see Master Response 1.

Support Card 63

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 63-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Beverly J Bologna

Address 10126 Daisy King Dr ZIP 95949

~~Phone~~ Grass Vly CA

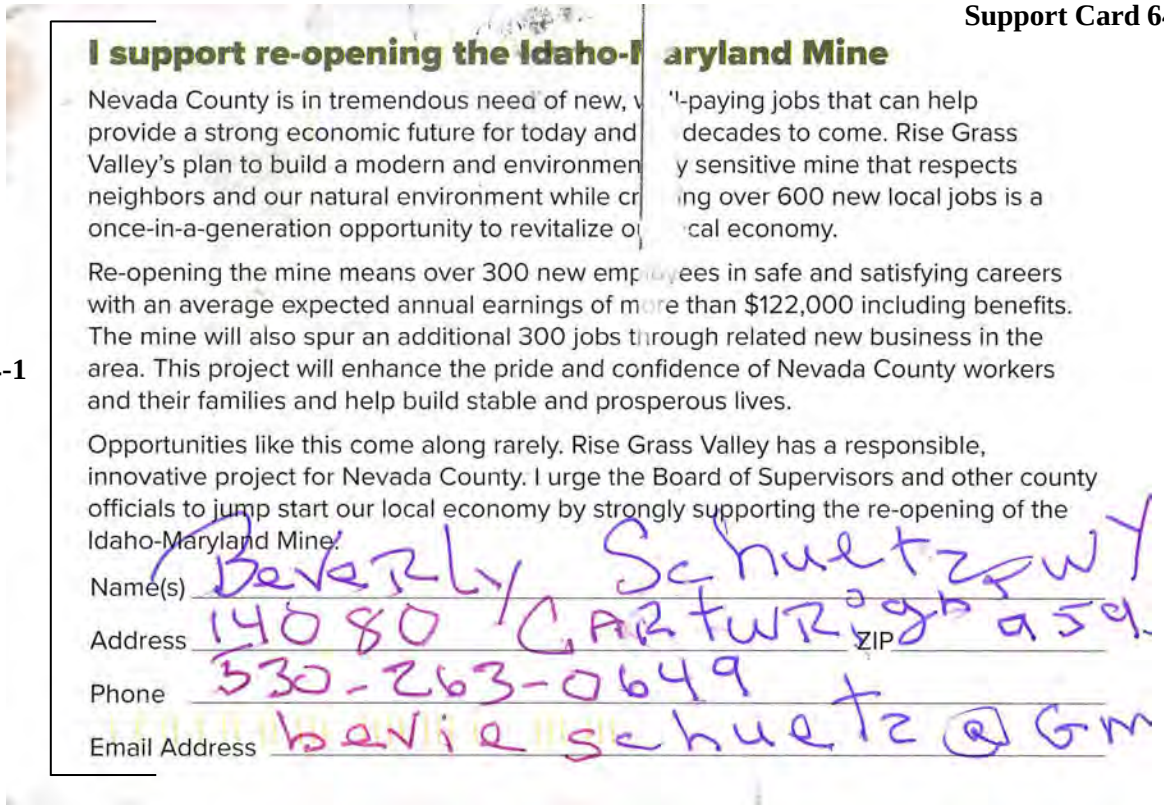
~~Email Address~~ (none)

SUPPORT CARD 63: BEVERLY J. BOLOGNA

Response to Comment Sup 63-1

Please see Master Response 1.

Support Card 64



I support re-opening the Idaho-Maryland Mine

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Sup 64-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Beverly Schuetz

Address 14080 Cartwright Way ZIP 959

Phone 530-263-0649

Email Address bevie schuetz@gm

SUPPORT CARD 64: BEVERLY SCHUETZ

Response to Comment Sup 64-1

Please see Master Response 1.

Support Card 65

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 65-1

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Name(s) Beverly Sieler

Address 12268 Sunset Ave ZIP 95945

Phone Grass Valley CA.

Email Address

SUPPORT CARD 65: BEVERLY SIELER

Response to Comment Sup 65-1

Please see Master Response 1.

Support Card 66

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 66-1

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Name(s) Beverly Sieler

Address 12268 Sunset Ave ZIP 95945

Phone

Email Address

SUPPORT CARD 66: BEVERLY SIELER

Response to Comment Sup 66-1

Please see Master Response 1.

Support Card 67

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 67-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Beverly Stillwater
PO Box 286
North San Juan, CA 95960

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

SUPPORT CARD 67: BEVERLY STILLWATER

Response to Comment Sup 67-1

Please see Master Response 1.

Support Card 68

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 68-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Beverly J Greenram

Address 12666 Sleepy Hollow Way ZIP 95959

Phone Nevada City CA

Email Address

SUPPORT CARD 68: BEVERLY B. SUENRAM

Response to Comment Sup 68-1

Please see Master Response 1.

Support Card 69

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 69-1

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Name(s) Bill Bakker

Address Po Box 2626 Nevada City ZIP 95959

Phone (530) 913-2671

Email Address Billam915@aol.com

SUPPORT CARD 69: BILL BAKKER

Response to Comment Sup 69-1

Please see Master Response 1.

Support Card 70

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 70-1

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Name(s) BILL BROOKS

Address 18817 CHEROKEE ROAD ZIP 95949

Phone 530-613-6195

Email Address WBBROOKS9339@SBCGLOBAL.NET

SUPPORT CARD 70: BILL BROOKS

Response to Comment Sup 70-1

Please see Master Response 1.

Support Card 71

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 71-1

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Name(s) BILL AND DIANE CASIE

Address 319 MARSHALL ST., GRASS VALLEY ZIP 95945

Phone 530) 273-3552

Email Address diane1016@sbcglobal.net

MAIL ADDRESS - P.O. BOX 2087 - GRASS VALLEY

SUPPORT CARD 71: BILL AND DIANE CASE

Response to Comment Sup 71-1

Please see Master Response 1.

Support Card 72

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 72-1

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Name(s) BILL CHAPPELL

Address 10157 KENWOOD DR. GV. ZIP 95949

Phone (530) 913-4963

Email Address EARLFLIP@GMAIL.COM

SUPPORT CARD 72: BILL CHAPPELL

Response to Comment Sup 72-1

Please see Master Response 1.

Support Card 73

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 73-1

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Name(s) Bill Lewis

Business Disabled Vet PH 530-274-2624

Address 11959 Rough and Ready Hwy G.V. Cal ZIP 95945

Email Address N/A

SUPPORT CARD 73: BILL LEWIS

Response to Comment Sup 73-1

Please see Master Response 1.

Support Card 74

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 74-1

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Name(s) Wm. Lewis

Address 11959 Ranch And Grant Hwy ZIP 95945

Phone I SUPPORT YOUR EFFORTS. G.V.

Email Address

SUPPORT CARD 74: BILL LEWIS

Response to Comment Sup 74-1

Please see Master Response 1.

Support Card 75

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 75-1

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Name(s) BILL & LINDA MADRU

Address 23554 SHADOW DR ZIP 95602

Phone 530-268-2888

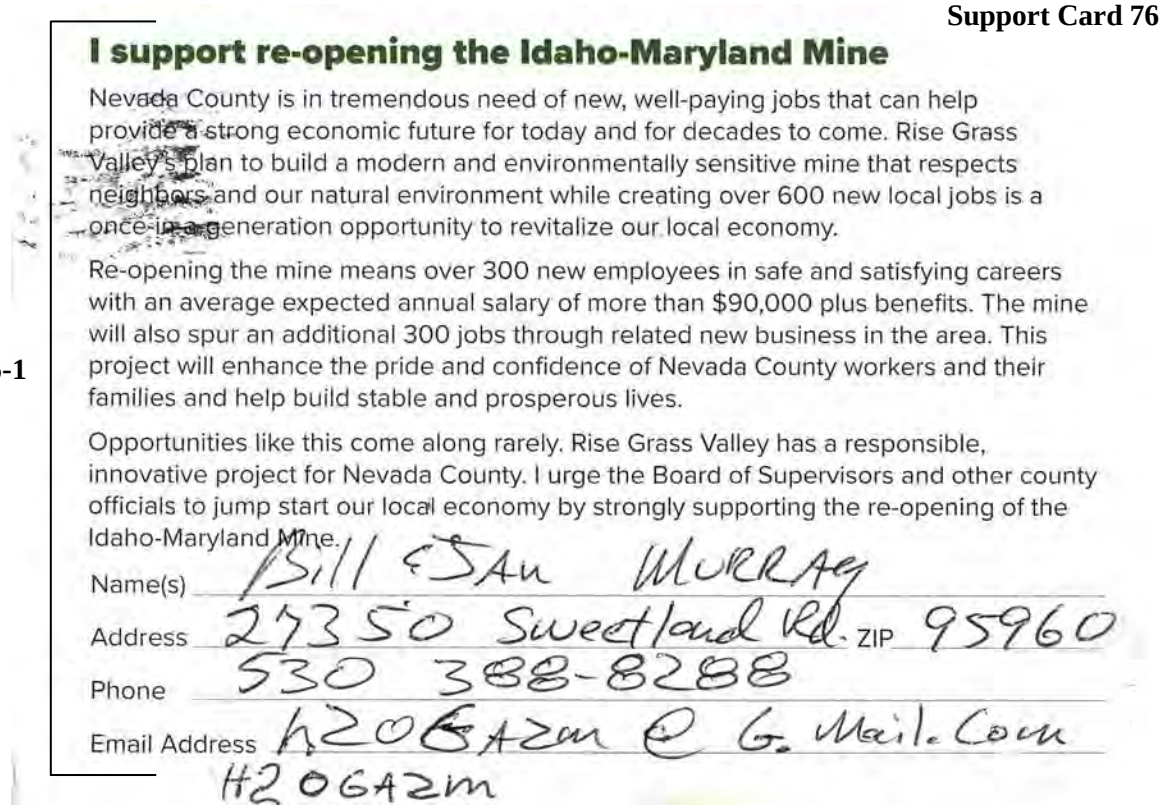
Email Address

SUPPORT CARD 75: BILL MAUDRU

Response to Comment Sup 75-1

Please see Master Response 1.

Support Card 76



I support re-opening the Idaho-Maryland Mine

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Name(s) Bill & Jan Murray

Address 27350 Sweetland Rd. ZIP 95960

Phone 530 388-8288

Email Address h2ogazm@gmail.com

H2OGAZM

Sup 76-1

SUPPORT CARD 76: BILL MURRAY

Response to Comment Sup 76-1

Please see Master Response 1.

Support Card 77

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 77-1

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Name(s) Bill Riske

Address 13705 Wheeler Acres Rd ZIP 95949
Grass Valley, CA.

Phone 530 273 6497

Email Address briske88@yahoo.com

SUPPORT CARD 77: BILL RISKE

Response to Comment Sup 77-1

Please see Master Response 1.

Support Card 78

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Supp 78-1

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Name(s) Bill Riske

Address 13705 Wheeler Acres Rd ZIP 95949

Grass Valley, CA.

Phone 530-273-6497

Email Address briske88@yahoo.com

SUPPORT CARD 78: BILL RISKE

Response to Comment Sup 78-1

Please see Master Response 1.

Support Card 79

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 79-1

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Name(s) BILL & KRIS STANDLEY

Address 111 BANK ST. #220, GRASS VALLEY ZIP 95945

Phone

Email Address BSTANDLEY@YAHOO.COM

SUPPORT CARD 79: BILL AND KRIS STANDLEY

Response to Comment Sup 79-1

Please see Master Response 1.

Support Card 80

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 80-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bill Riske

Address 13705 Wheeler Acres Rd ZIP 95949

Grass Valley CA 530-273-6491

Phone

Email Address briske88@yahoo.com

SUPPORT CARD 80: BILL RISKE

Response to Comment Sup 80-1

Please see Master Response 1.

Support Card 81

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 81-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bo Vaughan

Address 13462 Birney Springs Rd. ZIP 95959

Phone 530 274 0811

Email Address bovaughan7@gmail.com

SUPPORT CARD 81: BO VAUGHAN

Response to Comment Sup 81-1

Please see Master Response 1.

Support Card 82

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 82-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob Corrigan

Address 14619 Wild Duck Ct ZIP 95945

Phone 928 606 5009

Address robertcorrigan18@gmail.com

Are You Hiring?

SUPPORT CARD 82: BOB CORRIGAN

Response to Comment Sup 82-1

Please see Master Response 1.

Support Card 83

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 83-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob ORTWEIN

Address 10864 HENSON WAY ZIP 95949

Phone

Email Address

SUPPORT CARD 83: BOB ORTWEIN

Response to Comment Sup 83-1

Please see Master Response 1.

Support Card 84

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 84-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BOB & DONNA TREADWELL

Address 15280 SUNSHINE SPRINGS PLACE ZIP 95945 GRASS VALLEY

Phone 530 414 8493

Email Address BWCLL1950@GMAIL.COM

SUPPORT CARD 84: BOB TREADWELL

Response to Comment Sup 84-1

Please see Master Response 1.

Support Card 85

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 85-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob & Warden Wilder

Address 14297 Wardens Court ZIP 95945

Phone 530-273-2506

Email Address

SUPPORT CARD 85: BOB WILDER

Response to Comment Sup 85-1

Please see Master Response 1.

Support Card 86

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 86-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob Beems

Address 10470 clarks rd NSJ ZIP 95960

Phone 530 292 3696

Email Address

SUPPORT CARD 86: BOB BEAMS

Response to Comment Sup 86-1

Please see Master Response 1.

Support Card 87

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 87-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob Carman

Address 10155 S. Ponderosa Way, Rough & Ready ZIP 95975

Phone 530-273-8252

Email Address Carman_bob@Hotmail.com

SUPPORT CARD 87: BOB CARMAN

Response to Comment Sup 87-1

Please see Master Response 1.

Support Card 88

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives. HOW CAN WE HELP?

Sup 88-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob & JINX LARIVE

Address 13966 Bitler Rd ZIP 95959

Phone 530-432-8129

Email Address bobandmsjinx@gmail.com

SUPPORT CARD 88: BOB LARIVE

Response to Comment Sup 88-1

Please see Master Response 1.

Support Card 89

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 89-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Personeni, Bob, Teri, Andrew & Shannon

Business Western Directional, Inc Ph 530 2778374

Address 12322 Personeni Lane, Nevada City CA ZIP 95959

Email Address teri@terobmorgan.com

SUPPORT CARD 89: BOB PERSONEVI

Response to Comment Sup 89-1

Please see Master Response 1.

Support Card 90

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 90-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bob Swanson

Address 12835 Tall Tree Rd. ZIP 95949

Phone 650-207-3201

Email Address BobSHERO@Earthlink.Net

SUPPORT CARD 90: BOB SWANSON

Response to Comment Sup 90-1

Please see Master Response 1.

Support Card 91

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 91-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BOB & DONNA TREADWELL

Address 15280 SUNSHINE SPRINGS PLACE ZIP 95945

Phone 530 414 3473

Email Address BWELL4450@DUCK.COM

SUPPORT CARD 91: BOB TREADWELL

Response to Comment Sup 91-1

Please see Master Response 1.

Support Card 92

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 92-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BOB WILDER

Address 14297 WARDENS COURT ZIP 95945

Phone 530 273-2500

Email Address

SUPPORT CARD 92: BOB WILDER

Response to Comment Sup 92-1

Please see Master Response 1.

Support Card 93

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 93-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BOB YBARRONDO

Address 16259 [illegible] Rd ZIP 95945

Phone 530 – 913-1912

Email Address Bob [illegible] GMAIL.COM

SUPPORT CARD 93: BOB YBARRONDO

Response to Comment Sup 93-1

Please see Master Response 1.

Support Card 94

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 94-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bobbe Pfau

Address 15485 Lone Dr. Grass Valley ZIP 95949

Phone 530 274-7503

Email Address bobbepfau@gmail.com

SUPPORT CARD 94: BOBBE PFAU

Response to Comment Sup 94-1

Please see Master Response 1.

Support Card 95

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 95-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Brad + Shawna Sparks

Address 19015 Jay Hawk dr Penn Valley CA ZIP 95946

Phone (530) 218-7471

Email Address bsparks@njuhsd.com

SUPPORT CARD 95: BRAD SPARKS

Response to Comment Sup 95-1

Please see Master Response 1.

Support Card 96

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 96-1

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Name(s) Bradley Herton, Kelly & Tom Davis 530-305-7985

Address 10259 Evergreen Ranch Ct ZIP 95949

Phone 530, 640-8496

Email Address bradleyherton@gmail.com

SUPPORT CARD 96: BRADLEY HERTAN

Response to Comment Sup 96-1

Please see Master Response 1.

Support Card 97

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 97-1

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Name(s) Brady Tanner

Address 10381 Donna Way ZIP 95946

Phone

Email Address tanner4438@sbcglobal.net

SUPPORT CARD 97: BRADY TANNER

Response to Comment Sup 97-1

Please see Master Response 1.

Support Card 98

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 98-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Brandy Morris

Address 109 Kendall St Grass Valley, CA ZIP 95945

Phone 530 903 0974

Email Address bkett2002@yahoo.com

SUPPORT CARD 98: BRANDY MORRIS

Response to Comment Sup 98-1

Please see Master Response 1.

Support Card 99

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 99-1

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Name(s) BRENDA & MICHAEL GILDEA

Address 13720 TORREY PINES DRIVE ZIP 95602

Phone (530) 863-0414

Email Address brendamcgildea52@gmail.com

SUPPORT CARD 99: BRENDA GILDEA

Response to Comment Sup 99-1

Please see Master Response 1.

Support Card 100

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 100-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRENDA JENSEN

Address 10845 GOLD HILL DR, GV ZIP 95945

Phone 530-277-9572

Email Address b-jensen@sbcglobal.net

SUPPORT CARD 100: BRENDA JENSEN

Response to Comment Sup 100-1

Please see Master Response 1.

Support Card 101

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 101-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRENDA JENSEN

Address 10885 GOLD HILL Dr ZIP 95946

Phone 530-277-9572

Email Address blgw50@gmail.com

SUPPORT CARD 101: BRENDA JENSEN

Response to Comment Sup 101-1

Please see Master Response 1.

Support Card 102

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 102-1

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Name(s) BRENDA JENSEN

Address 10885 GOLD HILL DR ZIP 95945

Phone

Email Address BLJENSO@GMAIL.COM

SUPPORT CARD 102: BRENDA JENSEN

Response to Comment Sup 102-1

Please see Master Response 1.

Support Card 103

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 103-1

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Name(s) BRENT BOLING

Address 397 FRENCH AVE ZIP 95945

Phone

Email Address bolinghw@sbcglobal.net

SUPPORT CARD 103: BRENT BOLING

Response to Comment Sup 103-1

Please see Master Response 1.

Support Card 104

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 104-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Brent Jonas

Address 14553 Lake Wildwood Drive ZIP 95946

Phone

Email Address

SUPPORT CARD 104: BRENT JONAS

Response to Comment Sup 104-1

Please see Master Response 1.

Support Card 105

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 105-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sherri & Brent Oakley

Address 18211 Indian Springs Rd. ZIP 95946

Phone 530/432-9565

Email Address oakleysw@aol.com

SUPPORT CARD 105: BRENT OAKLEY

Response to Comment Sup 105-1

Please see Master Response 1.

Support Card 106

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 106-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRET DOVE

Address 12064 CRYSTAL WELLS RD ZIP 95959

Phone (510) 882-3976

Email Address dovebret@gmail.com

SUPPORT CARD 106: BRET DOVE

Response to Comment Sup 106-1

Please see Master Response 1.

Support Card 107

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 107-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Brian & DIANE FOSTER

Address 11997 Torrey Pine Dr. ZIP 95602

Phone 530 320-8771

Email Address happicampers.bf@gmail.com

SUPPORT CARD 107: BRIAN FOSTER

Response to Comment Sup 107-1

Please see Master Response 1.

Support Card 108

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 108-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRIAN FOSTER

Address 11997 Torrey Pines Dr. ZIP 95062

Phone

Email Address

SUPPORT CARD 108: BRIAN FOSTER

Response to Comment Sup 108-1

Please see Master Response 1.

Support Card 109

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 109-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRIAN WARRENSFORD

Address P.O. BOX 786 CEDAR RIDGE CA ZIP 95924

Phone 530 559.4509

Email Address thesolotrio@msn.com

SUPPORT CARD 109: BRIAN WARRENSFORD

Response to Comment Sup 109-1

Please see Master Response 1.

Support Card 110

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 110-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRUCE & JODI MCDONALD

Address 15038 COLFAX Hwy ZIP 95945

Phone 530-273-3231

Email Address EGGS@BRACKENRIDGERANCH.COM

SUPPORT CARD 110: BRUCE MCDONALD

Response to Comment Sup 110-1

Please see Master Response 1.

Support Card 111

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 111-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) C. BRUCE & JOAN D. McDONALD

Address 15038 COLFAX Hwy, G.V. CA ZIP 95945

Phone 530-273-3231

Email Address EGGS@BRACKENRIDGERANCH.COM

SUPPORT CARD 111: BRUCE MCDONALD

Response to Comment Sup 111-1

Please see Master Response 1.

Support Card 112

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 112-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bruce Schmauder

Address 14338 Highway 49, Sp #82 ZIP

Phone (530) 274-1801

Email Address bubba4ahm@yahoo.com

SUPPORT CARD 112: BRUCE SCHMAUDER

Response to Comment Sup 112-1

Please see Master Response 1.

Support Card 113

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 113-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bruce Hunt

Address P.O. Box 2093 Penn Valley CA ZIP 95946

Phone 916 417-3177

Email Address Bchuntle@aol.com

SUPPORT CARD 113: BRUCE HUNT

Response to Comment Sup 113-1

Please see Master Response 1.

Support Card 114

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 114-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRUCE & JUDI McDONALD

Address 15038 COLFAX Hwy, G.V., CA ZIP 95945

Phone 530-273-3231

Email Address EGGS@BRACKEN RIDGE RANCH.COM
ALL LOWER CASE — ONE WORD.

SUPPORT CARD 114: BRUCE MCDONALD

Response to Comment Sup 114-1

Please see Master Response 1.

Support Card 115

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 115-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bruce Schmauder

Address 14338 Highway 49, Sp. 82 Grass Valley, CA ZIP 95949

Phone 530 274-1801

Email Address bubba4ahm@yahoo.com

SUPPORT CARD 115: BRUCE SCHMAUDER

Response to Comment Sup 115-1

Please see Master Response 1.

Support Card 116

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 116-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRYAN LOPIN

Address 350 BENNETT ST APT 7 ZIP 95945

Phone 530-557-0578

Email Address BIGDADDYBRY@HOTMAIL.COM

SUPPORT CARD 116: BRYAN LOPIN

Response to Comment Sup 116-1

Please see Master Response 1.

Support Card 117

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 117-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CINDY ANDERSON & BUZZ PRESSER

Address 11812 POLARIS DR G.V. ZIP 95949

Phone 530 798 6169

Email Address CINDY69ANDERSON@YAHOO.COM

SUPPORT CARD 117: BUZZ PRESSER

Response to Comment Sup 117-1

Please see Master Response 1.

Support Card 118

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 118-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bethany Denkers and Byron Jones

Address 963 Morgan Ranch Drive, GV, CA ZIP 95945

Phone 530-559-7814

Email Address backthebluenevadacounty@gmail.com

SUPPORT CARD 118: BYRON JONES

Response to Comment Sup 118-1

Please see Master Response 1.

Support Card 119

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 119-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BYRON D. MAYNARD

Address 11935 SKIPPER COURT PENN VALLEY ZIP 95946

Phone 530 432-0608

Email Address BYMAYNARD@GMAIL.COM

SUPPORT CARD 119: BYRON D. MAYNARD

Response to Comment Sup 119-1

Please see Master Response 1.

Support Card 120

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 120-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Cora Lee Clifton

Address 11274 Prospector Rd ZIP 95975
Penn Valley Ca.

Phone

Email Address

SUPPORT CARD 120: CARA LEE CLIFTON

Response to Comment Sup 120-1

Please see Master Response 1.

Support Card 121

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 121-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CARL E. BARNES & FREDA BARNES

Address 10922 TERRACE PINES CT. ZIP 95945
GRASS VALLEY, CA.

Phone (530) 273-8213

Email Address CUBFB2@G.MAIL.COM

SUPPORT CARD 121: CARL BARNES

Response to Comment Sup 121-1

Please see Master Response 1.

Support Card 122

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 122-1

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Name(s) CARL E. BARNES & FREDA BARNES

Address 10922 TERRACE PINES CT. ZIP 95945

Phone (530) 273-8213 Cell-(530)263-1465

Email Address CUBFB2@GMAIL.COM

SUPPORT CARD 122: CARL BARNES

Response to Comment Sup 122-1

Please see Master Response 1.

Support Card 123

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 123-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Carl and Sandra Todd

Address 10454 Cyn. Cr. Ln. Penn Valley ZIP 95946

Phone 530 4325643

Email Address Todds29@yahoo.com

SUPPORT CARD 123: CARL TODD

Response to Comment Sup 123-1

Please see Master Response 1.

Support Card 124

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 124-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CARL & MARILYN GORDON

Address 11954 MAGNOLIA RD ZIP 95949

Phone 530 906-9080

Email Address CRG11954@gmail.com

SUPPORT CARD 124: CARL GORDON

Response to Comment Sup 124-1

Please see Master Response 1.

Support Card 125

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 125-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Carla Cipollone

Address 11551 Squirrel Creek ZIP 95945

Phone [redacted]

Email Address [redacted]

SUPPORT CARD 125: CARLA CIPOLLONE

Response to Comment Sup 125-1

Please see Master Response 1.

Support Card 126

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 126-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Carla Gianquento

Address 11551 Squirrel Creek Rd GV ZIP 95945

Phone

Email Address carlacbelly d@gmail.com

SUPPORT CARD 126: CARLA GIANQUENTO

Response to Comment Sup 126-1

Please see Master Response 1.

Support Card 127

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 127-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CARMEN BROWNING

Address 13482 SKIVIEW LOOP ZIP 96161

Phone 530-582-1857

Email Address

SUPPORT CARD 127: CARMEN BROWNING

Response to Comment Sup 127-1

Please see Master Response 1.

Support Card 128

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 128-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CAROL CARTER BARRETT

Address _____ ZIP _____

Phone 530-320-2078

Email Address _____

SUPPORT CARD 128: CAROL BARRETT

Response to Comment Sup 128-1

Please see Master Response 1.

Support Card 129

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 129-1

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Name(s) Carol & Larry Purcell

Address 16330 Gibboney Lane Grass Valley ZIP 95949

Phone

Email Address lcpurcell@nccn.net

SUPPORT CARD 129: CAROL AND LARRY PUREIER

Response to Comment Sup 129-1

Please see Master Response 1.

Support Card 130

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 130-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Carolanne Beeson

Address 12931 Gaston Drive Nevada City ZIP 95959

Phone (707) 502-7311

Email Address

SUPPORT CARD 130: CAROLANNE BEREN

Response to Comment Sup 130-1

Please see Master Response 1.

Support Card 131

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 131-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Kenneth M Wyman & Carolyn Parmley-Wyman

Address 11198 Burjee Rd. Nevada City, CA ZIP 95959-9450

Phone 530-265-0211

Email Address kenwyman@hotmail.com

SUPPORT CARD 131: CAROLYN PARMLEY-WYMAN

Response to Comment Sup 131-1

Please see Master Response 1.

Support Card 132

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 132-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Carolyn M Seyler

Address 22804 Sunset Ridge Dr ZIP

Auburn, CA 95602

Phone

Email Address

SUPPORT CARD 132: CAROLYN M. SEYLER

Response to Comment Sup 132-1

Please see Master Response 1.

Support Card 133

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 133-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Albert Nuijens and Carrie Highfill

Address P.O. Box 1091 Nevada City, ZIP CA 95959

Phone (530) 615-4469

Email Address CJohighfill@yahoo.com

SUPPORT CARD 133: CARRIE HIGHFILL

Response to Comment Sup 133-1

Please see Master Response 1.

Support Card 134

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 134-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Casey Chadwick

Address 17106 Colfax Hwy. Grass Valley ZIP 95945

Phone 530-913-6489

Email Address stonehedgegranite@gmail.com

SUPPORT CARD 134: CASEY CHADWICK

Response to Comment Sup 134-1

Please see Master Response 1.

Support Card 135

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 135-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Cathy Runne

Address 25074 Rodeo Flat Rd, Auburn, Ca ZIP 95602

Phone 530-305-4334

Email Address carunne@gmail.com

SUPPORT CARD 135: CATHY RUNNE

Response to Comment Sup 135-1

Please see Master Response 1.

Support Card 136

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MARIA Auxiliadora Centeno Vasquez

Address 275 Darsey Drive, Grass Valley, CA ZIP 95945

Phone 530-460-9038 only response

Email Address

Sup 136-1

SUPPORT CARD 136: CENTENO VASQUEZ

Response to Comment Sup 136-1

Please see Master Response 1.

Support Card 137

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 137-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHAD LEONARD BOHMAN

Address 23333 SCOTTS FLAT ROAD ZIP 95959

Phone 559-756-4531

Email Address ROCKETMAN7103@GMAIL.COM

SUPPORT CARD 137: CHAD BOHMAN

Response to Comment Sup 137-1

Please see Master Response 1.

Support Card 138

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 138-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Chad + Ashley Graybill

Address 23120 Patino Rd. ZIP 95977

Phone (530) 277-9631

Email Address chadgraybill7@hotmail.com

SUPPORT CARD 138: CHAD GRAYBILL

Response to Comment Sup 138-1

Please see Master Response 1.

Support Card 139

Sup 139-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chad Graybill

Address 23120 Patrino Rd. ZIP 95977

Phone (530) 277-9631

Email Address chadgraybill7@hotmail.com

SUPPORT CARD 139: CHAD GRAYBILL

Response to Comment Sup 139-1

Please see Master Response 1.

Support Card 140

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 140-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHALMER DE CECCO

Address 11309 LIME KILN RD ZIP 95949

Phone 530-268-9490

Email Address —

SUPPORT CARD 140: CHALMER DECECCO

Response to Comment Sup 140-1

Please see Master Response 1.

Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume III of IX
(Chapter 2 *Continued*)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Support Card 141

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Charleen Nugent

Address 11271 Lakeshore S., Auburn, CA ZIP 95602

Phone 530/488-0081

Email Address charleennugent@att.net

Sup 141-1

SUPPORT CARD 141: CHARLEEN NUGENT

Response to Comment Sup 141-1

Please see Master Response 1.

Support Card 142

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 142-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHARLES & PATTI BABIARZ

Address 12609 MINEY LN NC ZIP 95959

Phone 530 470 8964

Email Address BABIARZLV@SBCGLOBAL.COM

SUPPORT CARD 142: CHARLES BABIARZ

Response to Comment Sup 142-1

Please see Master Response 1.

Support Card 143

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 143-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHARLES BARDSLEY

Address 304 SUTTON WAY APT. 11 GRASS VALLEY ZIP 95945

Phone —

Email Address CHUCKWBARDSLEY@AOL.COM

SUPPORT CARD 143: CHARLES BARDSLEY

Response to Comment Sup 143-1

Please see Master Response 1.

Support Card 144

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 144-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHARLES W. ERIKSON

Address 19072 GREENHERN RD. G.V., CA ZIP 95945-9348

Phone (530) 477-1258

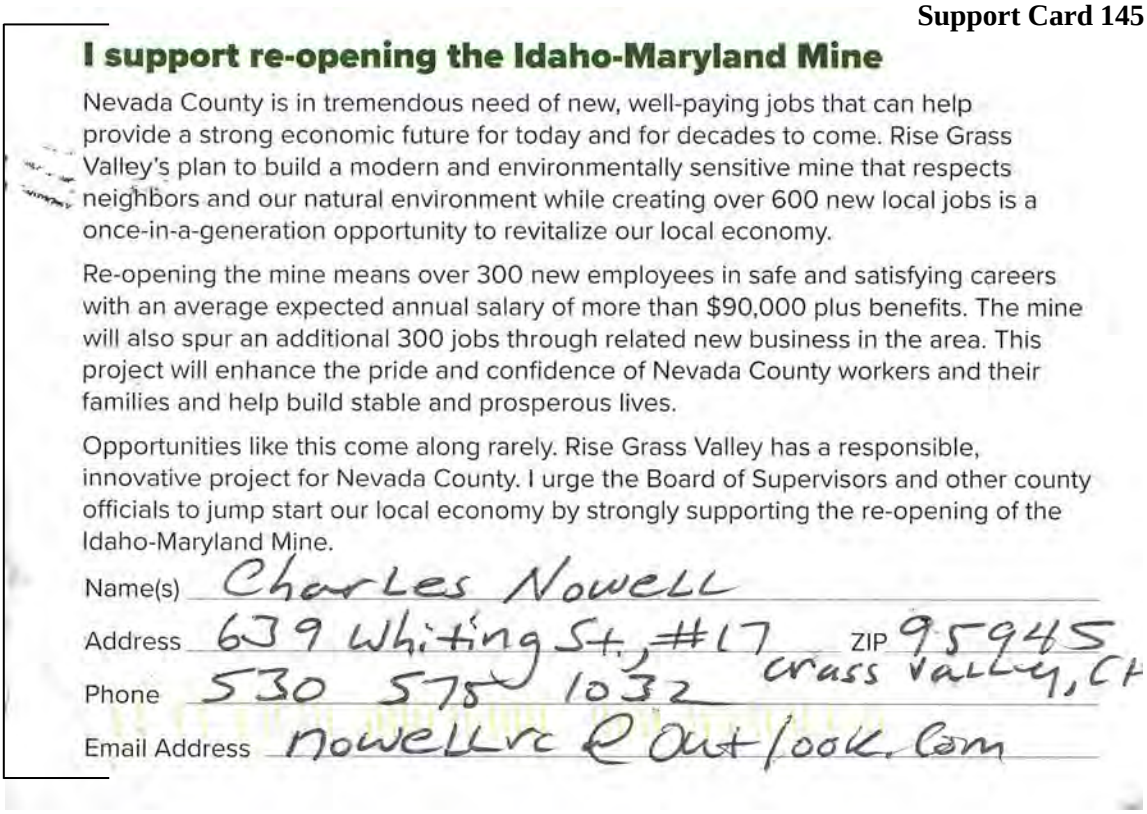
Email Address CHAINSAWCHUCK@JPS.NET

SUPPORT CARD 144: CHARLES ERIKSON

Response to Comment Sup 144-1

Please see Master Response 1.

Support Card 145



I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Charles Nowell

Address 639 Whiting St., #17 ZIP 95945

Phone 530 575 1032 Grass Valley, CA

Email Address nowellrc@outlook.com

Sup 145-1

SUPPORT CARD 145: CHARLES NOWELL

Response to Comment Sup 145-1

Please see Master Response 1.

Support Card 146

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 146-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Charles Nowell GV

Address 639 Whiting St, #17 ZIP 95945

Phone 530 575-1032

Email Address nowellrc@outlook.com

SUPPORT CARD 146: CHARLES NOWELL

Response to Comment Sup 146-1

Please see Master Response 1.

Support Card 147

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Charles Dennis Rowe

Address PO Box 308 Nevada City Ca. ZIP 95959

Phone 530-292-1902

Email Address

Sup 147-1

SUPPORT CARD 147: CHARLES ROWE

Response to Comment Sup 147-1

Please see Master Response 1.

Support Card 148

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 148-1

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Name(s) Charles Dennis Rowe

Address 13054 Folsom st North San Juan ZIP 95960

Phone 530-292-1902

Email Address

SUPPORT CARD 148: CHARLES ROWE

Response to Comment Sup 148-1

Please see Master Response 1.

Support Card 149

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 149-1

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Name(s) Charles R Smith

Address 13676 Newtown Rd Nevada City, ZIP 95959

Phone 530-913-1941

Email Address Chasrk29@gmail.com

SUPPORT CARD 149: CHARLES SMITH

Response to Comment Sup 149-1

Please see Master Response 1.

Support Card 150

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Charles Whittlesey

Address 15330 Blind Shady Rd Nevada City ZIP 95959

Phone 530-292-3249

Email Address

Sup 150-1

SUPPORT CARD 150: CHARLES WHITTLESEY

Response to Comment Sup 150-1

Please see Master Response 1.

Support Card 151

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 151-1

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Name(s) CHARLES WINDSOR

Address BUCKINGHAM, LONDON U.K. ZIP SW1A 1AA

Phone 207.930.4832

Email Address CHARLES@ROYAL.UK.GOV

SUPPORT CARD 151: CHARLES WILSON

Response to Comment Sup 151-1

Please see Master Response 1.

Support Card 152

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 152-1

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Name(s) CHARLES WINDSOR

Address BUCKINGHAM, LONDON U.K. ZIP SW1A 1AA

Phone 207.930.4832

Email Address CHARLES@ROYAL.UK.GOV

SUPPORT CARD 152: CHARLES WINDSOR

Response to Comment Sup 152-1

Please see Master Response 1.

Support Card 153

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) CHARLES RANDALL - LUISA VARO

Address 15640 CARRIE DR ZIP 95949

Phone 530-274-9130

Email Address

Sup 153-1

SUPPORT CARD 153: CHARLES RANDALL

Response to Comment Sup 153-1

Please see Master Response 1.

Support Card 154

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 154-1

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Name(s) CHERYL GOODROW

Address 2435 RIDGE RD ZIP 95945

Phone 530 613-3337

Email Address CMGOODROW@GMAIL.COM

SUPPORT CARD 154: CHARYL GOODROW

Response to Comment Sup 154-1

Please see Master Response 1.

Support Card 155

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 155-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Chris Buti

Address 11528 Avern Ln ZIP 95949

Phone 530-263-2087

Email Address

SUPPORT CARD 155: CHRIS BUTI

Response to Comment Sup 155-1

Please see Master Response 1.

Support Card 156

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 156-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Chris & Stephanie Friedman

Address 10654 Willowbrook Ln PV ZIP 95946

Phone 530-205-6429

Email Address Christopherleefriedman@gmail.com

SUPPORT CARD 156: CHRIS AND STEPHANIE FRIEDMAN

Response to Comment Sup 156-1

Please see Master Response 1.

Support Card 157

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 157-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris Hansen

Address 11665 Squirrel Creek Rd GV ZIP 95945

Phone 530-268-5663

Email Address crhansen@gmail.com

SUPPORT CARD 157: CHRIS HANSEN

Response to Comment Sup 157-1

Please see Master Response 1.

Support Card 158

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris H Harris

Address 14386 Torrey Pines Drive ZIP 95602

Phone

Email Address Chrishenry948@yahoo.com

Sup 158-1

SUPPORT CARD 158: CHRIS H. HARRIS

Response to Comment Sup 158-1

Please see Master Response 1.

Support Card 159

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 159-1

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JUL 3 0 2021

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHRIS HOFLAND

Address 146 INDEPENDENCE COURT ZIP 95945

Phone 530/ 274-8115

Email Address sql-servant@yahoo.com

SUPPORT CARD 159: CHRIS HOFLAND

Response to Comment Sup 159-1

Please see Master Response 1.

Support Card 160

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 160-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris Hughes

Address 234 Lloyd St ZIP 95945

Phone 530-913-7244

Email Address HughesChristopher1989@yahoo.com

SUPPORT CARD 160: CHRIS HUGHES

Response to Comment Sup 160-1

Please see Master Response 1.

Support Card 161

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 161-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris Johnson

Address ~~[illegible]~~ 19649 Morningside Rd. ZIP 95949

Phone 925-588-2618

Email Address _____

SUPPORT CARD 161: CHRIS JOHNSON

Response to Comment Sup 161-1

Please see Master Response 1.

Support Card 162

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 162-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris McBride

13337 APN

Address 10701 Red Quartz Ln. G.V. ZIP 95945

Phone 530-913-3766

Email Address chrismcbride530@gmail.com

SUPPORT CARD 162: CHRIS MCBRIDE

Response to Comment Sup 162-1

Please see Master Response 1.

Support Card 163

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 163-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chris & Mary Torrayson

Address 11676 Hilltop Dr. Grass Valley, CA ZIP 95949

Phone (530) 906-0211

Email Address christorrayson@gmail.com

SUPPORT CARD 163: CHRIS AND MAU TORREYSON

Response to Comment Sup 163-1

Please see Master Response 1.

Support Card 164

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 164-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Christina Feise & Collin Smith

Address 12608 Shady Creek Dr. Nevada City ZIP 95959

Phone (530) 798-8382 & (530) 798-3620

Email Address CollinSmith11@hotmail.com & Sexeybeast@live.com

SUPPORT CARD 164: CHRISTI LAMICA

Response to Comment Sup 164-1

Please see Master Response 1.

Support Card 165

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 165-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Christina Feise & Collin Smith

Address 12608 Shady Creek Dr. Nevada City ZIP 95959

Phone (530) 798-8382 & (530) 798-3620

Email Address CollinSmith11@hotmail.com & Sexeybeast@live.com

SUPPORT CARD 165: CHRISTINA FEISE AND COLLIN SMITH

Response to Comment Sup 165-1

Please see Master Response 1.

Support Card 166

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 166-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHRISTOPHER PAUL LEWIS

Address 11190 ICHEN CT (NEVADA CITY) ZIP 95977

Phone 530-510-7027

Email Address KLYDECAT@AOL.COM.

SUPPORT CARD 166: CHRISTOPHER PAUL LEWIS

Response to Comment Sup 166-1

Please see Master Response 1.

Support Card 167

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 167-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHRISTOPHER PHELAN

Address 12728 LAKESHORE N ZIP 95602

Phone (925) 998-9139

Email Address skater2u@icloud.com

SUPPORT CARD 167: CHRISTOPHER PHELAN

Response to Comment Sup 167-1

Please see Master Response 1.

Support Card 168

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 168-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHRISTOPHER REILLY

Address 16604 JOEY COURT ZIP 95949

Phone

Email Address castle55@yahoo.com

SUPPORT CARD 168: CHRISTOPHER REILLY

Response to Comment Sup 168-1

Please see Master Response 1.

Support Card 169

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 169-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHRISTOPHER REILLY

Address 16604 JOEY COURT ZIP 95949

Phone 916 521 9472

Email Address castle55@yahoo.com

SUPPORT CARD 169: CHRISTOPHER REILLY

Response to Comment Sup 169-1

Please see Master Response 1.

Support Card 170

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 170-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Chuck Nowell

Address 634 Whiting St, #17 ZIP 95945

Phone 530 575 1032

Email Address nowellrc@outlook.com

SUPPORT CARD 170: CHUCK NOWELL

Response to Comment Sup 170-1

Please see Master Response 1.

Support Card 171

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CINDY ANDERSON & BUZZ PRESSER

Address 11812 POLARIS DR G.V. ZIP 95949

Phone 530 798 6169

Email Address CINDY69ANDERSON@YAHOO.COM

Sup 171-1

SUPPORT CARD 171: CINDI ANDERSON

Response to Comment Sup 171-1

Please see Master Response 1.

Support Card 172

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 172-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) LINDI ANDERSON - MIKE GRIFFIN

Address 11812 POLARIS DR GV ZIP 95949

Phone 530 798 6169

Email Address LINDI69ANDERSON@YAHOO.COM

SUPPORT CARD 172: CINDI ANDERSON

Response to Comment Sup 172-1

Please see Master Response 1.

Support Card 173

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 173-1

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Name(s) Cindy Anderson

Address 265 Biggs Ave Apt C ZIP 95945

Phone 209 559 0154

Email Address cindy-anderson0217@yahoo

SUPPORT CARD 173: CINDY ANDERSON

Response to Comment Sup 173-1

Please see Master Response 1.

Support Card 174

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) CINDY WONG

Address 615 BUTLER ST ZIP 95945

Phone 530 - 2730136

Email Address

Sup 174-1

SUPPORT CARD 174: CINDY WONG

Response to Comment Sup 174-1

Please see Master Response 1.

Support Card 175

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 175-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Clarence TAYLOR

Address 131 Eureka St #104 G.V. ZIP 95945

Phone [illegible]

Email Address

SUPPORT CARD 175: CLARENCE TAYLOR

Response to Comment Sup 175-1

Please see Master Response 1.

Support Card 176

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 176-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Clark Pearson

Address 15329 Little Valley Rd. #33 Grass Valley ZIP 95949

Phone (530) 913-2353

Email Address 105tsierraclark@gmail.com

SUPPORT CARD 176: CLARK PEARSON

Response to Comment Sup 176-1

Please see Master Response 1.

Support Card 177

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 177-1

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Name(s) Claudette GRANADOS

Address 19905 Meyer Rd Chicago Park ZIP 95712

Phone 530-346-7076

Email Address

SUPPORT CARD 177: CLAUDETTE GRANADOS

Response to Comment Sup 177-1

Please see Master Response 1.

Support Card 178

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 178-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Claudia Bennett

Address 11572 Myrna Drive ZIP 95945
Grass Valley, CA

Phone

Email Address cjbennett@gmail.com

SUPPORT CARD 178: CLAUDIA BENNETT

Response to Comment Sup 178-1

Please see Master Response 1.

Support Card 179

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 179-1

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Name(s) Cliff Goodson

Address 10691 Arey Pl, Grass Valley CA ZIP 95949

Phone 916-747-4647

Email Address cgoodson77@gmail.com

SUPPORT CARD 179: CLIFF GOODSON

Response to Comment Sup 179-1

Please see Master Response 1.

Support Card 180

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 180-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Clint & Karen Mallingow

Address P.O. Box 518 G.V. ZIP 95945

Phone

Email Address

SUPPORT CARD 180: CLINT AND CAREN NALLINGTON

Response to Comment Sup 180-1

Please see Master Response 1.

Support Card 181

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 181-1

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Name(s) Clyde Kemp

Address P.O Box 444 Chicago Park CA ZIP 95712

Phone 530-346-9466

Email Address CEKLASO@EARTHLINK.NET

SUPPORT CARD 181: CLYDE KING

Response to Sup 181-1

Please see Master Response 1.

Support Card 182

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 182-1

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Name(s) Christina Feise & Collin Smith

Address 12608 Shady Creek Dr. Nevada City ZIP 95959

Phone (530) 798-8382 & (530) 798-3620

Email Address CollinSmith11@hotmail.com & Sexeybeast@live.com

SUPPORT CARD 182: COLLIN SMITH

Response to Sup 182-1

Please see Master Response 1.

Support Card 183

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 183-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ms Constance Huebner

Address 150 Sutton Way Apt 243 ZIP Grass Valley, CA 95945

Phone 650-455-8679

Email Address clhueb5er@aol.com

SUPPORT CARD 183: CONSTANCE HUEBNER

Response to Sup 183-1

Please see Master Response 1.

Support Card 184

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 184-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CRAIG COMEAUX

Address 14230 PLOVER WAY ZIP 95949
G.V. CA

Phone 530 559-8119

Email Address CRAIGCOMEAUX@ATT.NET

SUPPORT CARD 184: CRAIG COMEAUX

Response to Sup 184-1

Please see Master Response 1.

Support Card 185

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 185-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Craig Fox

Address 11802 Tom Ray Dr. ZIP 95949

Phone (530) 362-0620

Email Address fox635@att.net

SUPPORT CARD 185: CRAIG FOX

Response to Sup 185-1

Please see Master Response 1.

Support Card 186

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 186-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CRAIG GARNER

Address 11598 LOWER PINE HILL DR. ZIP 95945

Phone

Email Address CRAIGGARNER@SBCGLOBAL.NET

SUPPORT CARD 186: CRAIG GARNER

Response to Sup 186-1

Please see Master Response 1.

Support Card 187

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 187-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Curtis McMullan

Address 18950 Jayhawk dr ZIP 95946

Phone (530) 955-5870

Email Address curtisb@gmail.com

SUPPORT CARD 187: CURTIS MCMULLAN

Response to Sup 187-1

Please see Master Response 1.

Support Card 188

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 188-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Curtis McMullan

Address 18950 Jayhawk Dr. ZIP 95946

Phone (530) 955-5840

Email Address Curtisbw@gmail.com

SUPPORT CARD 188: CURTIS MCMULLAN

Response to Sup 188-1

Please see Master Response 1.

Support Card 189

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 189-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Curtis Price

Address 10796 Cone Tree Trail ZIP 95945

Phone 530.575-9871

Email Address ceprice2@gmail.com.

SUPPORT CARD 189: CURTIS PRICE

Response to Sup 189-1

Please see Master Response 1.

Support Card 190

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 190-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. we love gold mining in Nevada county.

Name(s) Cynthia E Pekarek

Address 19 Wendy Cir ZIP 95945

Phone (530) 272-2217 or cell-(530)-913-8891

Email Address www.cindygoldminer@Yahoo.com

SUPPORT CARD 190: CYNTHIA E. PEKAREK

Response to Sup 190-1

Please see Master Response 1.

Support Card 191

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 191-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) D. L. BLOCHIE

Address P.O. BOX 1523 NEVADA CITY, CA ZIP 95959

Phone

Email Address RUBBERDUCKJR@HOTMAIL.COM

SUPPORT CARD 191: D. L. BLOCHE

Response to Sup 191-1

Please see Master Response 1.

Support Card 192

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 192-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DALE BOHNENBERGER

Address 10067 GOLDEN POLARIS PL ZIP 95949

Phone

Email Address no.1engineer@live.com

SUPPORT CARD 192: DALE BOHNENBERGER

Response to Sup 192-1

Please see Master Response 1.

Support Card 193

Sup 193-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dale & Astra Bolin

Address 10257 Horton St. Penn Valley Ca ZIP 95946

Phone

Email Address

SUPPORT CARD 193: DALE AND ARTIE BOLIN

Response to Sup 193-1

Please see Master Response 1.

Support Card 194

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 194-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dale & Artie Bolin

Address 10257 Horton St. Penn Valley, Ca ZIP 95946

Phone 1-530-432-1179

Email Address ardal2@att.net

SUPPORT CARD 194: DALE AND ARTIE BOLIN

Response to Sup 194-1

Please see Master Response 1.

Support Card 195

Sup 195-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dale + Jean Hafelfinger

Address 18707 Three Flames Rd Grass Valley ZIP 95949

Phone 530-798-8137

Email Address sixofhearts2030@gmail.com

SUPPORT CARD 195: DALE AND JEAN HAFELFINGER

Response to Sup 195-1

Please see Master Response 1.

Support Card 196

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 196-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dale Hafelfinger

Address 18707 Three Horses Rd ZIP 95949

Phone 530-798-8137

Email Address sisofhearts2020@gmail.com

SUPPORT CARD 196: DALE HAFELFINGER

Response to Sup 196-1

Please see Master Response 1.

Support Card 197

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 197-1

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Name(s) DAN BROKAW

Address 15329 LITTLE VALLEY RD SPC # 53 ZIP 95949

Phone 913-3764

Email Address -0-

SUPPORT CARD 197: DAN BROKAW

Response to Sup 197-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 198**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 198-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dan J. DeMarini

Address 15431 Monte Vista Dr ZIP 95959

Phone 530-559-5583

Email Address dan@sbbmail.com

SUPPORT CARD 198: DAN J. DEMARTINI

Response to Sup 198-1

Please see Master Response 1.

Support Card 199

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 199-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAN DRISCOL

Address P.O. Box 123 CEDAR RIDGE, Ca. ZIP 95924

Phone

Email Address

SUPPORT CARD 199: DAN DRISCOL

Response to Sup 199-1

Please see Master Response 1.

Support Card 200

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 200-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dan Fadling

Address 16892 Aileen Way ZIP 95949

Phone 916 300 8766

Email Address danfadling@gmail.com

SUPPORT CARD 200: DAN FADLING

Response to Sup 200-1

Please see Master Response 1.

Support Card 201



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAN MOWER

Address 20054 TIGER TAIL ZIP 95949

Phone 530 277 4085

Email Address danemower@gmail.com

Poor choice of names; Rise GV

Sup 201-1

SUPPORT CARD 201: DAN MOWER

Response to Sup 201-1

Please see Master Response 1.

Support Card 202

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 202-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAN & CELESTE RIFFLE

Address 16508 KIWI RD ZIP 95949

Phone 530-272-4558

Email Address SRDRIFFLE@GMAIL

SUPPORT CARD 202: DAN AND CELESTE RIFFLE

Response to Sup 202-1

Please see Master Response 1.

Support Card 203

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 203-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAN & Audrey/CH YOUNG

Address 16056 Bush Rd Nevada City ZIP 95959

Phone 530 2659668

Email Address FAMCALY19@GMAIL.COM

SUPPORT CARD 203: DAN AND AUDREYLEA YOUNG

Response to Sup 203-1

Please see Master Response 1.

Support Card 204

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 204-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mr. Daniel Burdekin

Address 16600 Norlene Way ZIP

Grass Valley, CA 95949

Phone

Email Address DBURDEKIN@YAHOO.COM

SUPPORT CARD 204: DANIEL BURDEKIN

Response to Sup 204-1

Please see Master Response 1.

Support Card 205

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 205-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Daniel Danckert

Address 19740 Matthew Rd ZIP 95949

Phone 916 718 3235

Email Address ddanckert@hotmail.com

SUPPORT CARD 205: DANIEL DANCKERT

Response to Sup 205-1

Please see Master Response 1.

Support Card 206

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Daniel DiPietro

Address 212 South Church St ZIP 95945

Phone (530)446-1006

Email Address dandipietro1@yahoo.com

Sup 206-1

SUPPORT CARD 206: DANIEL DIPIETRO

Response to Sup 206-1

Please see Master Response 1.

Support Card 207

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 207-1 Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Daniel Joe Leidel

Address Po 2934 Grass Valley CA, ZIP 95945

Phone 530-798-3733

Email Address GoldenChain49a.Gmail.CoM

SUPPORT CARD 207: DANIEL JOE LEIDEL

Response to Sup 207-1

Please see Master Response 1.

Support Card 208

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 208-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) DANIEL & KATHLEEN REISWIG

Address 11684 RIDGE RD, NEVADA CITY ZIP 95959

Phone 530-478-9293

Email Address danreis58@gmail.com

SUPPORT CARD 208: DANIEL AND KATHLEEN REISWIG

Response to Sup 208-1

Please see Master Response 1.

Support Card 209

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DANIEL E. Siegle

Address 11539 INVERNESS WAY ZIP 95602

Phone 530 401 7007

Email Address N/A

Sup 1-209

SUPPORT CARD 209: DANIEL E. SIEGLE

Response to Sup 209-1

Please see Master Response 1.

Support Card 210

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Danielle White

Address 244 Dorsey Dr #52 ZIP 95945

Phone 530 392 7447

Email Address love1anothernow@gmail.com

Sup 210-1

SUPPORT CARD 210: DANIELLE WHITE

Response to Sup 210-1

Please see Master Response 1.

Support Card 211

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 211-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Danielle White

Address 244 Dorsey Dr. #52 G.V. CA. ZIP 95945

Phone 530-392-7447

Email Address

SUPPORT CARD 211: DANIELLE WHITE

Response to Sup 211-1

Please see Master Response 1.

Support Card 212

Sup 212-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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P-3 P40 278**********ECRWSH**R002

Name(s) Dannie Dwight Andrews

Address 12989 Madrone Forest Dr

Nevada City, CA 95959-8940

Phone

Email Addr

SUPPORT CARD 212: DANNIE DWIGHT ANDREWS

Response to Sup 212-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 213**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 213-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Darrel & Jude Edzards

Address 10529 Carriage Rd. ZIP

Phone Grass Valley, CA 95949

Email Address

SUPPORT CARD 213: DARREL AND JUDE EDZARDS

Response to Sup 213-1

Please see Master Response 1.

Support Card 214

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 214-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DARRELL J. FREUDE

Address 16791 INDIAN SPRINGS RANCH RZIP 95949

Phone 272 4360

Email Address DIGGERPINE@THEUNION.NET

SUPPORT CARD 214: DARRELL J. FREUDE

Response to Sup 214-1

Please see Master Response 1.

Support Card 215

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 215-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Darrell Murphy

Address 11851 Nancy Lane GV ZIP 95945

Phone

Email Address

SUPPORT CARD 215: DARRELL MURPHY

Response to Sup 215-1

Please see Master Response 1.

Support Card 216

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 216-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Darryl Stoner

Address 12425 Lake Wildwood DR ZIP 95946

Phone 530 913 7668

Email Address

SUPPORT CARD 216: DARRYL STONER

Response to Sup 216-1

Please see Master Response 1.

Support Card 217

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DARYL BAITH / BECKY KIDDER

Address 25241 CHINA HOLLOW RD ZIP 95602

Phone

Email Address ESSDARYL@GMAIL.COM

Sup 217-1

SUPPORT CARD 217: DARYL BARTH

Response to Sup 217-1

Please see Master Response 1.

Support Card 218

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 218-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dave & Victoria Frye

Address 10155 Adhan Ave. Grass Valley CA ZIP 95945

Phone 530. 477. 6155

Email Address Frye_Davidc Hotmail.com

SUPPORT CARD 218: DAVE AND VISTORIA FRYE

Response to Sup 218-1

Please see Master Response 1.

Support Card 219

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 219-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVE + LYNN MATSON

Address 14254 BANNIER-LAVA CAP RD. ZIP 95959

Phone 530-362-9000

Email Address DMMATSON@DMCEINC.COM

SUPPORT CARD 219: DAVE AND LYNN MATSON

Response to Sup 219-1

Please see Master Response 1.

Support Card 220

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 220-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) DAVE MATSON

Business DMCE Concrete + Eng. Contractors Ph 530-272-2708

Address 12002 Charles Dr. Grass Valley, Ca ZIP 95945

Email Address DMMATSON@DMCEINC.COM

SUPPORT CARD 220: DAVE MATSON

Response to Sup 220-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 221**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 221-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dave Sivertsen

Address 12706 Palisade St ZIP 95161

Phone 530 448 9250

Email Address Davesivertsen@hotmail.com

SUPPORT CARD 221: DAVE SIVERTSEN

Response to Sup 221-1

Please see Master Response 1.

Support Card 222

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Race Travis

Address PO Box 792 Penn Valley ZIP 95946

Phone 530-368-9821

Email Address moondog2501@hotmail.com

Sup 222-1

SUPPORT CARD 222: DAVE TRAVIS

Response to Sup 222-1

Please see Master Response 1.

Support Card 223

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 223-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) DAVID L BLOCHE

Address P.O. Box 1523 ZIP 95959

Phone

Email Address RUBBERDUCKJR@HOTMAIL.COM

SUPPORT CARD 223: DAVID BLOCHE

Response to Sup 223-1

Please see Master Response 1.

Support Card 224

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 224-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Casner

Address 21840 Perimeter Rd. ZIP 95949

Phone 530-652-4341

Email Address MCROACH52@yahoo.com

SUPPORT CARD 224: DAVID CASNER

Response to Sup 224-1

Please see Master Response 1.

Support Card 225

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 225-1

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Name(s) DAVID CLAYTON

Address 16296 FAWNBROOK RD. NSJ ZIP 95960

Phone 530-292-0155

Email Address

SUPPORT CARD 225: DAVID CLAYTON

Response to Sup 225-1

Please see Master Response 1.

Support Card 226

Sup 226-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DAVID FRAZER

Address 16817 OSCAR DR. GRASS VALLEY ZIP 95949

Phone 530 913 7269

Email Address davidfrazer@att.net

SUPPORT CARD 226: DAVID FRAZER

Response to Sup 226-1

Please see Master Response 1.

Support Card 227

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 227-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) David Colubertock

Address 13493 Ringtail Rd ZIP 95946

Phone

Email Address

SUPPORT CARD 227: DAVID GLUBATCH

Response to Sup 227-1

Please see Master Response 1.

Support Card 228

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 228-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID HIGBEE

Address 11897 Lost Ranch Way N.C. ZIP 95959

Phone (530) 575-0849

Email Address dhserv@gmail.com

SUPPORT CARD 228: DAVID HIGBEE

Response to Sup 228-1

Please see Master Response 1.

Support Card 229

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 229-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID LANDON

Address 10549 Gold Flat Rd. N.C. ZIP 95959

Phone 530-913-2824

Email Address

SUPPORT CARD 229: DAVID LANDON

Response to Sup 229-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 230**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 230-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Lauren, zo

Address 10057 Gavesio Ranch Rd ZIP 95959

Phone 630 670 0969

Email Address 12dlauren@gmail.com

SUPPORT CARD 230: DAVID LAURENZO

Response to Sup 230-1

Please see Master Response 1.

Support Card 231

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) David Mapa

Address P.O. Box 850 Rough & Ready, CA ZIP 95975

Phone 605-786-7723

Email Address david.mapa-927@yahoo.com

Sup 231-1

SUPPORT CARD 231: DAVID MAPA

Response to Sup 231-1

Please see Master Response 1.

Support Card 232

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 232-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Rice

Address 14796 Ballantree Ln Grass Valley ZIP 95949

Phone 707-672-5928

Email Address dmdrice@gmail.com

SUPPORT CARD 232: DAVID RICE

Response to Sup 232-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine

Support Card 233

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 233-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID ARNOLD SAUER Yes Yes

Address P.O. BOX 242 N.S.J. ZIP 95960

Phone 530-292-3519

~~Email~~ Address Street 24599 Pleasant Valley Rd N.S.J. 95960

SUPPORT CARD 233: DAVID ARNOLD SALLER

Response to Sup 233-1

Please see Master Response 1.

Support Card 234

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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"YES"

Name(s) David Thompson

Address 15808 Dos Bar Rd ZIP 95949

Phone 530-559-5420

Email Address dt5713@gmail.com

Sup 234-1

SUPPORT CARD 234: DAVID THOMPSON

Response to Sup 234-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 235**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 235-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Vertin

Address 431 Uren St ZIP 95959

Phone 530-265-5349

Email Address vertin.david@gmail.com

SUPPORT CARD 235: DAVID VERTINI

Response to Sup 235-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 236**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 236-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID R. Whatley

Address 105 S CHURCH ST APT 302 ZIP 95945

Phone 530-263-8162

Email Address WHATLEYDAVID609@GMAIL.COM

SUPPORT CARD 236: DAVID R. WHATLEY

Response to Sup 236-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine

Support Card 237

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 237-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID ASHWORTH

Address 17312 COOPER RD NC ZIP 95959

Phone _____

Email Address _____

SUPPORT CARD 237: DAVID ASHWORTH

Response to Sup 237-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 238**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 238-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID DODD

Address 25112 OLD VALLEY RD CA ZIP 95602

Phone 530-559-8636

Email Address ddodd1965@gmail.com

SUPPORT CARD 238: DAVID DODD

Response to Sup 238-1

Please see Master Response 1.

Support Card 239

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 239-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David and Dawne Hughes

Address 11372 Sadie Lane, G.V. ZIP 95945

Phone 530-477-6422

Email Address nwdh3@Yahoo.com

SUPPORT CARD 239: DAVID AND DAWNE HUGHES

Response to Sup 239-1

Please see Master Response 1.

Support Card 240

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 240-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Kimmich

Address 13195 Jupiter Dr. GV ZIP 95945

Phone 530-263-4550

Email Address

SUPPORT CARD 240: DAVID KIMMICH

Response to Sup 240-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 241**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 241-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Kimmich

Address 13195 Jupiter Dr Grass Valley ZIP 95945

Phone _____

Email Address _____

SUPPORT CARD 241: DAVID KIMMICH

Response to Sup 241-1

Please see Master Response 1.

Support Card 242

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David E Koerber

Address 22132 Pioneer Way ZIP

Phone Grass Valley, CA 95949

Email Address

Sup 242-1

SUPPORT CARD 242: DAVID E. KOERBER

Response to Sup 242-1

Please see Master Response 1.

Support Card 243

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 243-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David A. Kuttner

Address 19449 Valley Vista Way ZIP 95949

Phone (530) 432-9930

Email Address

SUPPORT CARD 243: DAVID A. KUTTLER

Response to Sup 243-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 244**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 244-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David Lawrenzo

Address 10057 Garesio Ranch Rd ZIP 95959

Phone 630 670 0969

Email Address dlawrenzo@davidjamesgroup.com

SUPPORT CARD 244: DAVID LAURENZO

Response to Sup 244-1

Please see Master Response 1.

Support Card 245

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 245-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) David & Elisabeth Nelson

Address 13774 Forest Park Circle ZIP 95946

Phone

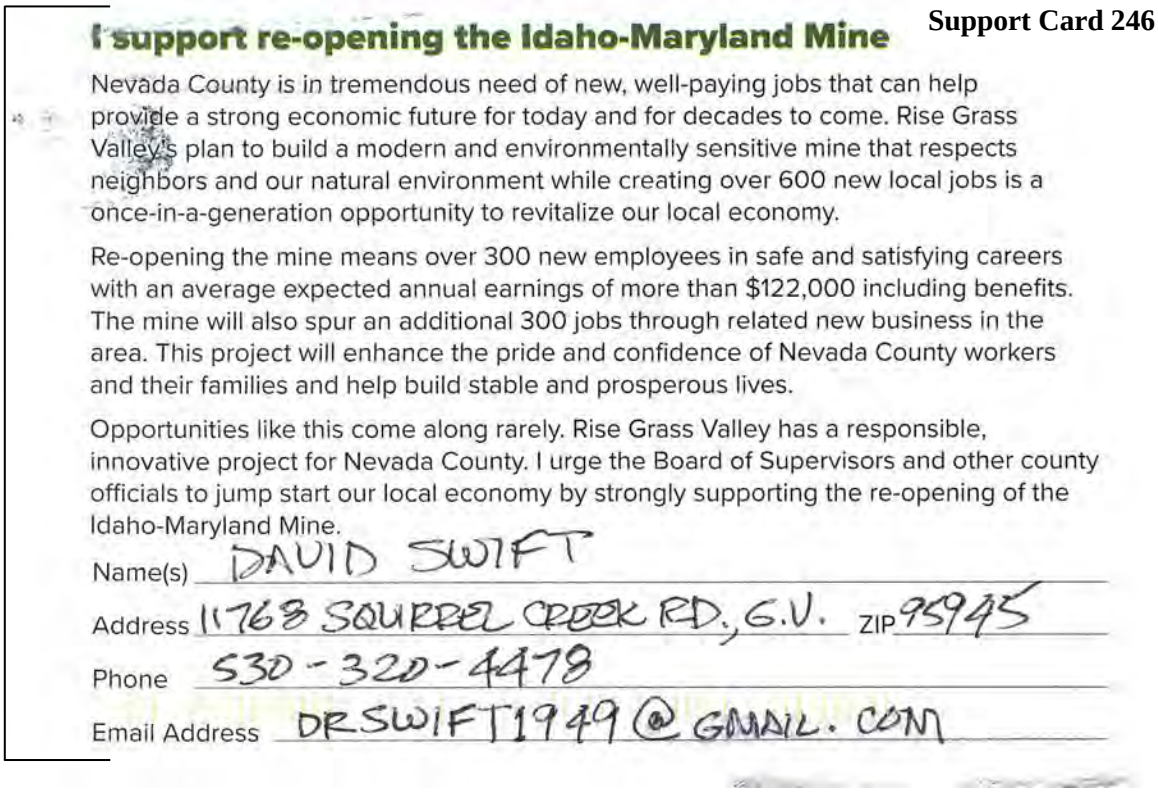
Email Address

SUPPORT CARD 245: DAVID AND ELISABETH NELSON

Response to Sup 245-1

Please see Master Response 1.

Support Card 246



I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DAVID SWIFT

Address 11768 SQUIRREL CREEK RD., G.V. ZIP 95945

Phone 530-320-4478

Email Address DRSWIFT1949@GMAIL.COM

Sup 246-1

SUPPORT CARD 246: DAVID SWIFT

Response to Sup 246-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine

Support Card 247

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 247-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DONALD McEDWARDS & DAWNA ALLEN

Address 14054 SUGAR LOAF ROAD ZIP 95949

Phone 707/354-4618

Email Address themcedwardsgroup@att.net

SUPPORT CARD 247: DAWNA ALLEN

Response to Sup 247-1

Please see Master Response 1.

Support Card 248

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 248-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jodi Steele Dean Blodgett Joseph Blodgett

Address 10435 Manzanita Drive Grass Valley ZIP 95945

Phone

Email Address

SUPPORT CARD 248: DEAN BLODGETT

Response to Sup 248-1

Please see Master Response 1.

Support Card 249

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 249-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dean Christensen

Address P.O. Box 1015-G.V. Ca ZIP 95945

Phone 530-913-9427

Email Address None

SUPPORT CARD 249: DEAN CHRISTENSEN

Response to Sup 249-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 250**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 250-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JERRY KARNOW & DEBBIE DAJAS

Address P.O. Box 1745, Rough & Ready ZIP 95975

Phone 530-575-5974 530-432-1962

Email Address Karnowj@gmail.com

SUPPORT CARD 250: DEBBIE DAJAS

Response to Sup 250-1

Please see Master Response 1.

Support Card 251

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 251-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ① Debbie Dajas
② JERRY KARNOW JR. (Fish & Game Warden - retired)

Address P.O. Box 1745, Rough & Ready ZIP 95975

Phone 530-575-5974

Email Address Karnowj@saber.net

SUPPORT CARD 251: DEBBIE DAJAS AND JERRY KARNOW JR

Response to Sup 251-1

Please see Master Response 1.

Support Card 252

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 252-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Debbie Ghiringhelli

Address 12875 Robinhood Dr ZIP 95949

Phone 530 272 3485

Email Address debbieghiringhelli@att.net

SUPPORT CARD 252: DEBBIE GHIRINGHELL

Response to Sup 252-1

Please see Master Response 1.

I support re-opening the ~~Idaho~~-Maryland Mine. **Support Card 253**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 253-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Debbie Ghiringhelli

Address 12875 Robinhood Dr ZIP 95949

Phone 530 263 2799

Email Address dghiringhelli@attinet

SUPPORT CARD 253: DEBBIE GHIRINGHELL

Response to Sup 253-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 254**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 254-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Debora Ghiringhelli

Address 12875 Robinhood Dr. ZIP 95949

Phone 530 263 2799

Email Address dghiringhelli@att.net

SUPPORT CARD 254: DEBBIE GHIRINGHELL

Response to Sup 254-1

Please see Master Response 1.

Support Card 255

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 255-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Deborah A. Balmino - Graham

Address 11444 Francis Dr. Grass Valley ZIP 95949
CA.

Phone _____

Email Address _____

SUPPORT CARD 255: DEBORAH A. BALMINO-GRAHAM

Response to Sup 255-1

Please see Master Response 1.

Support Card 256

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 256-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DEBORAH S BROWN MD
GEORGE E NOUD MD

Address 11739 LAKESHORE NORTH ZIP

Phone AUBURN CA 95602

Email Address georgenoud@gmail.com

SUPPORT CARD 256: DEBORAH BROWN AND GEORGE NOUD

Response to Sup 256-1

Please see Master Response 1.

Support Card 257



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DEBORAH BURNETT

Address 10567 IVEY LN, NEVADA CITY ZIP 95959

Phone 530-292-3117

Email Address DBURNETT46@PEOPLEPC.COM

Sup 257-1

SUPPORT CARD 257: DEBORAH BURNETT

Response to Sup 257-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 258**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Deborah and Chris Frank

Address PO Box 416 Rose Valley CA ZIP 95946

Phone 530-702-8362 530-902-4832

Email Address debfrnk@sbcglobal.net

Sup 258-1

SUPPORT CARD 258: DEBORAH AND CHRIS FRANK

Response to Sup 258-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 259**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 259-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Deborah & Shawn Schepperle

Address 12215 Fallen Leaf Lane, Nevada City, CA ZIP 95959

Phone (530) 790-5535

Email Address deborahschepperle@yahoo.com

SUPPORT CARD 259: DEBORAH AND SHAWN SCHEPPERLE

Response to Sup 259-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 260**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 260-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DEL Liverey

Address 12025 Charles DR Grass Valley ZIP 95945

Phone 530-477-3361

Email Address None

SUPPORT CARD 260: DEL LIVEREY

Response to Sup 260-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine. **Support Card 261**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 261-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Debra Stella

Address 131 Edwards St. Grass Valley CA ZIP 95945

Phone 530 273 7125

Email Address

SUPPORT CARD 261: DELOISE SUTTON

Response to Sup 261-1

Please see Master Response 1.

Support Card 262

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Bo Louise SUTTON

Address [illegible] EUREKA St. GRASS VALLEY, CA ZIP 95945

Phone

Email Address

Sup 262-1

SUPPORT CARD 262: DELOISE SUTTON

Response to Sup 262-1

Please see Master Response 1.

Support Card 263

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 263-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Delulace W. Rueppel

Address 11755 LAKESHORE SOUTH AUBURN CA ZIP 95602

Phone

Email Address

SUPPORT CARD 263: DELULACE RUEPPEL

Response to Sup 263-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine

Support Card 264

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 264-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Denise Youngman

Address PO BOX 586 Penn Valley Ca. ZIP 95946

Phone 530 432-9943

Email Address rodeo110@yahoo.com

SUPPORT CARD 264: DENISE YOUNGMAN

Response to Sup 264-1

Please see Master Response 1.

Support Card 265

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 265-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis M Chipchase

Address 11198 Ringtail Rd, Penn Valley ZIP 95946

Phone 5305590711

Email Address PAS Mike a Comcast, Net

SUPPORT CARD 265: DENNIS M. CHIPCHASE

Response to Sup 265-1

Please see Master Response 1.

Support Card 266

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 266-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DENNIS R. COLE

Address 12942 SQUIRREL RD. RD ZIP 95945

Phone (530) 273-4183

Email Address drcole570@yahoo.com

SUPPORT CARD 266: DENNIS COLE

Response to Sup 266-1

Please see Master Response 1.

Support Card 267

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 267-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) DENNIS L. ELLIOTT

Address 10495 C St GRASS VALLEY ZIP 95945

Phone 530 272 0255

Email Address DENNIS ELLIOTT@ COMCAST . NET

SUPPORT CARD 267: DENNIS ELLIOTT

Response to Sup 267-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine

Support Card 268

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 268-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DENNIS GRUBE / REBECCA GRUBE

Address 16353 ALEXANDRA WAY GRASS VALLEY ZIP 95949

Phone 530-913-3809

Email Address d-grube101@HOTMAIL.COM

SUPPORT CARD 268: DENNIS AND REBECCA GRUBE

Response to Sup 268-1

Please see Master Response 1.

Support Card 269

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 269-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis Hanson

Address 23406 SHADOW DR L.O.P. ZIP 95602

Phone 530 401-1741

Email Address

SUPPORT CARD 269: DENNIS HANSON

Response to Sup 269-1

Please see Master Response 1.

Support Card 270

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 270-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis R. Kocher

Address 23238 Shadow Dr. ZIP 95602

Phone 530-320-1678

Email Address MarjKocher8992@gmail.com

SUPPORT CARD 270: DENNIS KOCHER

Response to Sup 270-1

Please see Master Response 1.

Support Card 271

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 271-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis Madsen

Address 344 Pleasant St. G.V. CA Apt. A ZIP 95945

Phone (530) 271-0826

Email Address dennisricly40@Gmail.com

SUPPORT CARD 271: DENNIS MADSEN

Response to Sup 271-1

Please see Master Response 1.

Support Card 272

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 272-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis Madsen

Address 344 Pleasant St #A ZIP 95945

Phone (530) 271-0826

Email Address dennisriely40@gmail.com

SUPPORT CARD 272: DENNIS MADSEN

Response to Sup 272-1

Please see Master Response 1.

Support Card 273

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 273-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis Ray Madsen

Address 344 Pleasant St. #A ZIP 95945

Phone (530) 271-0826

Email Address dennisriely40@gmail.com

SUPPORT CARD 273: DENNIS MADSEN

Response to Sup 273-1

Please see Master Response 1.

Support Card 274

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 274-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dennis D. Sorrell

Address 775 Old Tunnel Rd. ZIP 95945

Phone

Email Address -0-

SUPPORT CARD 274: DENNIS SORRELL

Response to Sup 274-1

Please see Master Response 1.

Support Card 275

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 275-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DENNIS E WESSELS

Address 841 old TUNNEL RD # 26 ZIP 95945

Phone 530 648-8924

Email Address dwessels430@GMAIL.COM

SUPPORT CARD 275: DENNIS E. WESSELS

Response to Sup 275-1

Please see Master Response 1.

Support Card 276

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 276-1

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Name(s) DENNIS WESSELS

Address 841 Old TUNNEL RD # 26 ZIP 95945

Phone 530-648-8924

Email Address dwessels43@gmail.com

SUPPORT CARD 276: DENNIS WESSELS

Response to Sup 276-1

Please see Master Response 1.

Support Card 277

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 277-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Derek Spangler

Address 10975 Lincoln Way, Penn Valley ZIP 95946

Phone 530-263-4955

Email Address

SUPPORT CARD 277: DEREK SPANGLER

Response to Sup 277-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 278**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Dian Fischer

Address mailing P.O. Box 1026 Cedar Ridge CA. ZIP 95924

Phone 530-446-4416

Email Address diantischer@hotmail.com

Physical address 11221 Cedar Ridge Dr. GV. 95924

Sup 278-1

SUPPORT CARD 278: DIAN FISCHER

Response to Sup 278-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 279**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 279-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

MY FATHER ONCE WORKED THERE - in the 1940's CARL HAWK

Name(s) DIANA PRUSKI

Address 10096 NICOLAS DR ZIP 95961

Phone 530 386 0668

Email Address dyanaprus@gmail.com

SUPPORT CARD 279: DIANA PRUSKI

Response to Sup 279-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 280**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 280-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DIANA RILEY

Address 518 BUTLER ST. G.V. ZIP 95945

Phone 530-913-1965

Email Address vriley28@yahoo.com

SUPPORT CARD 280: DIANA RILEY

Response to Sup 280-1

Please see Master Response 1.

Support Card 281

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 281-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DIANA RILEY

Address 518 Butler St. ZIP 95945

Phone 530-913-1965

Email Address vriley28@yahoo.com

SUPPORT CARD 281: DIANA RILEY

Response to Sup 281-1

Please see Master Response 1.

Support Card 282

Sup 282-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DIANE MYERS

Address 18204 WILDFLOWER DR ZIP 95946

Phone 530 432 5912

Email Address conservative12@comcast.net

SUPPORT CARD 282: DIANE MYERS

Response to Sup 282-1

Please see Master Response 1.

Support Card 283

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DIANE ROSSI

Address 10405 BUFFINGTON COURT ZIP 95959

NEVADA City

Phone

Email Address dianeRossi1950@gmail.com

Sup 283-1

SUPPORT CARD 283: DIANE ROSSI

Response to Sup 283-1

Please see Master Response 1.

Support Card 284

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 284-1

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Name(s) DIANE ROSSI

Address 10405 BUFFINGTON COURT NC ZIP 95959

Phone (831) 901-0815

Email Address dianeRossi1954@gmail.com

SUPPORT CARD 284: DIANE ROSSI

Response to Sup 284-1

Please see Master Response 1.

Support Card 285

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 285-1

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Name(s) DIANE RICHARDSON

Address 10654 WILLOW LN PENN VALLEY ZIP 95946

Phone 530 432-8206

Email Address

SUPPORT CARD 285: DIANE RICHARDSON

Response to Sup 285-1

Please see Master Response 1.

Support Card 286

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 286-1

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Name(s) DIANNA Dee Bicocca

Address 5315 Kietzke Lane Unit 327 ZIP 89511-8546

Phone 530 263-4859

Email Address deedee.bicocca@gmail.com

SUPPORT CARD 286: DIANE DEE BIOCCA

Response to Sup 286-1

Please see Master Response 1.

Support Card 287

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dirk & Nicholle Meyer

Address 16573 Alexandra Way ZIP 95949

Phone (530) 263-2759

Email Address DirkTMeyer@yahoo.com

Sup 287-1

SUPPORT CARD 287: DIRK AND NICHOLLE MEYER

Response to Sup 287-1

Please see Master Response 1.

Support Card 288

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____



Sup 288-1

SUPPORT CARD 288: DON AND KAREN BURROWS

Response to Sup 288-1

Please see Master Response 1.

Sup 289-1

I support re-opening the Idaho-Maryland Mine

Support Card 289

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don & Anita Daniels

Address 10282 Old Dairy Place, GV ZIP 95945

Phone 530-272-6036

Email Address dondaniels@sbcglobal.net

SUPPORT CARD 289: DON AND ANITA DANIELS

Response to Sup 289-1

Please see Master Response 1.

Support Card 290

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 290-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DON DANIELS

Business DANIELS CIRCLE "D" INVESTIGATIONS Ph 530-272-6036

Address 10282 OLD DAIRY PL, GRASS VALLEY, CA ZIP 95945

Email Address dondaniels@sbcglobal.net

SUPPORT CARD 290: DON DANIELS

Response to Sup 290-1

Please see Master Response 1.

Support Card 291

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 291-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don Foulk

Address 14260 Ln Bar Pines Dr ZIP 95949

Phone

Email Address foulk.don@gmail.com

SUPPORT CARD 291: DON FOULK

Response to Sup 291-1

Please see Master Response 1.

Support Card 292

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 292-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don R Jones

Address 21955 McDaniel Rd ZIP 95977

Phone 530 432 6697

Email Address donrjones@hughes.net

SUPPORT CARD 292: DON R. JONES

Response to Sup 292-1

Please see Master Response 1.

Support Card 293

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 293-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don R. Jones

Address 21955 McDaniel Road ZIP 95977

Phone 530 432 6697

Email Address donrjones@hughes.net

SUPPORT CARD 293: DON R. JONES

Response to Sup 293-1

Please see Master Response 1.

Support Card 294

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 294-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DON & DIANE MALCOLM

Address 162 WEST OLYMPIA DR. ZIP 95945

Phone 530-273-2724

Email Address

SUPPORT CARD 294: DON AND DIANE MALCOLM

Response to Sup 294-1

Please see Master Response 1.

Support Card 295

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 295-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DON PETTIS

Address PO Box 116 Washington, CA ZIP 95986

Phone (530) 470 0286

Email Address N/A E-mail

SUPPORT CARD 295: DON PETTIS

Response to Sup 295-1

Please see Master Response 1.

Support Card 296

Sup 296-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) DON SWARTZ

Address 13368 Grass Valley Ave ZIP 95945

Phone 530 305 3846

Email Address donswartzdiesel@gmail.com

SUPPORT CARD 296: DON SWARTZ

Response to Sup 296-1

Please see Master Response 1.

Support Card 297

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 297-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Donald + Shirlee Bantoli

Address 15720 SHANNON Wy, NEVADA City, CA ZIP 95959

Phone (530) 265-3688

Email Address donaldbantoli@comcast.net

SUPPORT CARD 297: DONALD AND SHIRLEE BARTOLI

Response to Sup 297-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 298**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 298-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Donald Bartoli

B

Address 15720 Shannon Way ZIP

Nevada City, CA 95959-8944

Phone

Email Address djbartoli@gmail.com

SUPPORT CARD 298: DONALD BARTOLI

Response to Sup 298-1

Please see Master Response 1.

Support Card 299

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 299-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DONALD HOFFLER

Address 11480 SNOWLINE RD NEVADA CITY ZIP 95959

Phone 530-913-2258

Email Address DEHOFFLER@GMAIL.COM

SUPPORT CARD 299: DONALD HOFFLER

Response to Sup 299-1

Please see Master Response 1.

Support Card 300

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 300-1

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Name(s) DONALD McEDWARDS & DAWNA ALLEN

Address 14054 SUGAR LOAF ROAD ZIP 95949

Phone 707/354-4618

Email Address themcedwardsgroup@att.net

SUPPORT CARD 300: DONALD MCEDWARDS AND DAWNA ALLEN

Response to Sup 300-1

Please see Master Response 1.

Support Card 301

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Donald O Williams

Address 17901 Vintage Dr Grass Valley CA. ZIP 95949

Phone —0—

Email Address None

Sup 301-1

SUPPORT CARD 301: DONALD O. WILLIAMS

Response to Sup 301-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 302**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 302-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DONALD WILLIAMS

Address 17901 VINTAGE DR. GRASS VALLEY CA. ZIP 95949

Phone [redacted]

Email Address [redacted]

SUPPORT CARD 302: DONALD WILLIAMS

Response to Sup 302-1

Please see Master Response 1.

Support Card 303

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 303-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Donald Wirta

Address 341 Empire Ct Apt B ZIP 95945

Phone 530-272-3150

Email Address

SUPPORT CARD 303: DONALD WIRTA

Response to Sup 303-1

Please see Master Response 1.

Support Card 304

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 304-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) DONNA IMSAND

Address 12647 Colfax Hwy ZIP 95945

Phone 530-559-2411

Email Address [illegible]

SUPPORT CARD 304: DONNA IMSAND

Response to Sup 304-1

Please see Master Response 1.

Support Card 305

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 305-1

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Name(s) Tom Jacobson & Donna Salmonson

Address 15053 Arrowhead Ln ZIP 95945

Phone 530-613-1706 530-613-9582

Email Address tomjacobson63 deegeebeecee @gmail.com

SUPPORT CARD 305: DONNA SALMONSON

Response to Sup 305-1

Please see Master Response 1.

Support Card 306

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 306-1

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Name(s) DONNA STEWART

Address 220 Nihell St, N.C ZIP 95959

Phone 530-798-0277

Email Address donnasever@sbcglobal.net

SUPPORT CARD 306: DONNA STEWART

Response to Sup 306-1

Please see Master Response 1.

Support Card 307

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 307-1

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Name(s) DONNA STEWART

Address 220 NIHELL ST NC ZIP 95959

Phone 530-798-0277

Email Address donnasever@shcglobal.net

SUPPORT CARD 307: DONNA STEWART

Response to Sup 307-1

Please see Master Response 1.

Support Card 308

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 308-1

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Name(s) Donna-Lynn Wenker

Address 12684 Butterfly Wr. Nevada City ZIP 95959

Phone 530-273-4566

Email Address

SUPPORT CARD 308: DONNA-LYNN DUNBAR

Response to Sup 308-1

Please see Master Response 1.

Support Card 309

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 309-1

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Name(s) Dora Hermansen

Address 11026 Atolia Rd ZIP 95959

Phone N/A

Email Address Dora.weir8@gmail.com

SUPPORT CARD 309: DORA HERMANSEN

Response to Sup 309-1

Please see Master Response 1.

Support Card 310

Sup 310-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Doris Penaluna

Address P.O Box 1172 GV ZIP 95945

Phone 273-9179

Email Address none

SUPPORT CARD 310: DORIS PENALUNA

Response to Sup 310-1

Please see Master Response 1.

Support Card 311

Sup 311-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Dorothy Felonl

Address 55 Wendy Cir ZIP 95945

Phone

Email Address deedeefelonil953@gmail.com

SUPPORT CARD 311: DOROTHY FELONI

Response to Sup 311-1

Please see Master Response 1.

Support Card 312

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 312-1

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Name(s) DOROTHY HARDING

Address 12635 WOLF RD, GRASS VALLEY, CA ZIP 95949

Phone 530-575-8842

Email Address ddjh1941@GMAIL.COM

SUPPORT CARD 312: DOROTHY HARDING

Response to Sup 312-1

Please see Master Response 1.

Support Card 313

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 313-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Doug Dreher

Address 14472 Santag rd Grass Valley ZIP 95945

Phone

Email Address

SUPPORT CARD 313: DOUG DREHER

Response to Sup 313-1

Please see Master Response 1.

Support Card 314

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 314-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Doug & Sue Miller

Address 15811 Lakewood Lane, G.V. ZIP 95945

Phone 530 906-8110

Email Address DougMiller25@gmail.com

SUPPORT CARD 314: DOUG AND SUE MILLER

Response to Sup 314-1

Please see Master Response 1.

Support Card 315

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 315-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Doug Plumley

Address 13008 N. Day Rd G.V. ZIP 95945

Phone 530-362-2094

Email Address

SUPPORT CARD 315: DOUG PLUMLEY

Response to Sup 315-1

Please see Master Response 1.

Support Card 316

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 316-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives. Douglas Leruchett PO B 644 NSJ

Kathys Land Line 530265-3659

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Whittlesey. Kathy ← Kathy Whittlesey
cell 5304465683 gmail.com 17455 Skyland RD.
cell Kathy's Com. Nevada City CA 95959

Name(s) Joe Leidel

Address PO 2934 Grass Valley CA ZIP 95945

Phone 530 798-3733 golden Chain 49@gmail.com

Email Address goldenChain49@gm.com 530-798-3733
mil.com

SUPPORT CARD 316: DOUGLAS LERUCHETT

Response to Sup 316-1

Please see Master Response 1.

Support Card 317

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 317-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Duane Breiten

Address PO 232 Grass Valley ZIP 95945

Phone 916-975-4727

Email Address duanabreiten4@gmail.com

SUPPORT CARD 317: DUANE BREITON

Response to Sup 317-1

Please see Master Response 1.

Support Card 318

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 318-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DWAYNE and JOYCE TOMSON

Address 10107 WOODLEAF CIR., GRASS VALLEY, CA ZIP 95949

Phone 530-273-4533

Email Address dwaynetomson37@gmail.com

SUPPORT CARD 318: DWAYNE AND JOYCE TOMSON

Response to Sup 318-1

Please see Master Response 1.

Support Card 319

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 319-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DWAYNE + JOYCE TOMSON

Address 10107 WOODLEAF CIR., GRASS VALLEY ZIP 95949

Phone 530-273-4533

Email Address dwaynetomson37@gmail.com

SUPPORT CARD 319: DWAYNE AND JOYCE TOMSON

Response to Sup 319-1

Please see Master Response 1.

Support Card 320

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 320-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Dwight E. Johnson

Address 10895 Success Cross Rd ZIP 95959

Phone 530-477-2325

Email Address dwightejohnson44@gmail.com

SUPPORT CARD 320: DWIGHT E. JOHNSON

Response to Sup 320-1

Please see Master Response 1.

Support Card 321

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 321-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DWIGHT E. JOHNSON

Address 10895 SUCCESS X. RD ZIP 95959

Phone 530. 277. 0977 NEVADA CITY CA

Email Address dwight@johnson44@gmail.com

SUPPORT CARD 321: DWIGHT E. JOHNSON

Response to Sup 321-1

Please see Master Response 1.

Support Card 322

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 322-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ED STRANGE / JENNIFER STRANGE

Address 12125 PITCAIRN LN. NEVADA CITY ZIP 95959

Phone 530-273-8558

Email Address CA_BEAR70@COMCAST.NET

SUPPORT CARD 322: ED AND JENNIFER STRANGE

Response to Sup 322-1

Please see Master Response 1.

Support Card 323

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 323-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ED TOWNSEND

Address 228 CYPRESS HILL DR ZIP 95945

Phone 530-277-6498

Email Address BANJOED1950@gmail.com

SUPPORT CARD 323: ED TOWNSEND

Response to Sup 323-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 324**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 324-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) EDWARD QUICK

Address 18011 FAR HILLS RANCH RD ZIP 95959

Phone (530) 432-9937

Email Address EQUICK50C@YAHOO.COM

SUPPORT CARD 324: EDWARD QUICK

Response to Sup 324-1

Please see Master Response 1.

Support Card 325

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 325-1

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Name(s) EDWARD D SMITH

Address 11461 LAKESHORE NORTH ZIP 95602

Phone 530) 941-4023

Email Address TEDANDMARY@SUDDENLINK.NET

SUPPORT CARD 325: EDWARDS D. SMITH

Response to Sup 325-1

Please see Master Response 1.

Support Card 326

Sup 326-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Eduardo Valdovinos

Address _____ ZIP 95945

Phone 5309556652

Email Address _____

SUPPORT CARD 326: EDWARDO VALDEVINO

Response to Sup 326-1

Please see Master Response 1.

Support Card 327

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Elinor Miller

Address 4120 Godley Rd ZIP 95648

Phone Lincoln

Email Address

Sup 327-1

SUPPORT CARD 327: ELINOR MULLOY

Response to Sup 327-1

Please see Master Response 1.

Support Card 328

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Elise Timoney

Address 18250 Traingle Ln ZIP 95949

Phone 8585315104

Email Address

Sup 328-1

SUPPORT CARD 328: ELISE TIMONEY

Response to Sup 328-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 329**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 329-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ELIZABETH (BETTY) PRICE

Address P.O. BOX 396 ROUGH & READY ZIP 95975

Phone (530) 477-5914

Email Address

SUPPORT CARD 329: ELIZABETH PRICE

Response to Sup 329-1

Please see Master Response 1.

Support Card 330

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 330-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ELIZABETH PRICE

Address P.O. BOX 396 RACKHAOD READY ZIP 95975

Phone (530) 477-5914

Email Address /

SUPPORT CARD 330: ELIZABETH PRICE

Response to Sup 330-1

Please see Master Response 1.

Support Card 331

Sup 331-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) ELTON R. BUTLER

Address 15431 Excelsior Ditch Camp Rd. Nevada City ZIP 95959

Phone

Email Address

SUPPORT CARD 331: ELTON R. BUTLER

Response to Sup 331-1

Please see Master Response 1.

Support Card 332

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 332-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

ENVIRONMENTAL SYSTEMS
111 Bank Street #208
Grass Valley, CA 95945

SUPPORT CARD 332: ENVIRONMENTAL SYSTEMS

Response to Sup 332-1

Please see Master Response 1.

Support Card 333

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 333-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ERIC DOVE

Address 12125 CRYSTAL WELLS RD ZIP 95959

Phone NEVADA City CA

Email Address

SUPPORT CARD 333: ERIC DOVE

Response to Sup 333-1

Please see Master Response 1.

Support Card 334

I support re-opening the Idaho-Maryland Mine

SACRAMENTO CA 9
22 FEB 2022 PM 6

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) ERIC DOVE

Address 12125 CRYSTAL WELLS RD ZIP 95959

Phone 530/559-3453

Email Address —0—

Sup 334-1

SUPPORT CARD 334: ERIC DOVE

Response to Sup 334-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 335**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 335-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Eric Leffingwell

Address Po box 364 Chicago Park ca ZIP 95712

Phone 530 210-0975

Email Address es1507gsxr@gmail.com

SUPPORT CARD 335: ERIC LEFFINGWELL

Response to Sup 335-1

Please see Master Response 1.

Support Card 336

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 336-1

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Name(s) Eric Daniels

Address 18462 N. Cherry Creek Rd ZIP 95949

Phone _____

Email Address _____

SUPPORT CARD 336: ERIC DANIELS

Response to Sup 336-1

Please see Master Response 1.

Support Card 337

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) ERIC V DOVE

Address 12625 CRYSTAL WELLS RD ZIP 95959

Phone (530)559 3453 NEVADA CITY CA

Email Address ~~O~~ ARE YOU HIRING?

Sup 337-1

SUPPORT CARD 337: ERIC V. DOVE

Response to Sup 337-1

Please see Master Response 1.

Support Card 338

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) ERIK VAN DER ZALM

Address 18572 NORLENE WAY ZIP 95949

Phone 530 388 5969

Email Address ERIK.VANDERZALM@gmail.com

Sup 338-1

SUPPORT CARD 338: ERIK VAN DER ZALM

Response to Sup 338-1

Please see Master Response 1.

Support Card 339

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 339-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Erik & Cassie Angle

Address 10298 Pittsburg Rd Nevada City, CA ZIP 95959

Phone 530-477-5384

Email Address erikncass1@yahoo.com

SUPPORT CARD 339: ERIK AND CASSIE ANGLE

Response to Sup 339-1

Please see Master Response 1.

Support Card 340

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 340-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ERNIE & CHRISTIANNE HARRIES

Address 10057 CELIO RD. N.C. ZIP 95954

Phone (530) - 362- 0382

Email Address

SUPPORT CARD 340: ERNIE AND CHRISTIANNE HARRIES

Response to Sup 340-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 341**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 341-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ERNIE & CHRISTIANNE HARRIES

Address 10057 CEDRO RD. NEVADA CITY ZIP CA.

Phone 530-362-0382

Email Address

SUPPORT CARD 341: ERNIE AND CHRISTIANNE HARRIES

Response to Sup 341-1

Please see Master Response 1.

Support Card 342

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 342-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ERNYLLA ENGLAND

Address 18589 LAKE FOREST DR. ZIP 95946

Phone 530-320-5216

Email Address Before I would vote any further I want to know — who owns the mine?

SUPPORT CARD 342: ERNYLLA ENGLAND

Response to Sup 342-1

Please see Master Response 1.

Support Card 343

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ERROL + MARLA MCINTYRE

Address 13041 GLEN RAVEN RD ZIP 95959

Phone 530-478-1915

Email Address

Sup 343-1

SUPPORT CARD 343: ERROL AND MARLA MCINTYRE

Response to Sup 343-1

Please see Master Response 1.

Support Card 344

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 344-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Estelle LeMere

Address 12151 Francis Drive ZIP 95949

Phone 530 829-1859

Email Address Starflowereb[redacted]@gmail.com

SUPPORT CARD 344: ESTELLE LEMERE

Response to Sup 344-1

Please see Master Response 1.

Support Card 345

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 345-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Evelyn McCallister

Address PO Box 266 Penn Valley ZIP 95946

Phone

Email Address

SUPPORT CARD 345: EVELYN MCCALLISTER

Response to Sup 345-1

Please see Master Response 1.

Support Card 346

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 346-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ed Mohr

Address 23954 Balsam Ct. ZIP 95602

Phone 530 268 2408

Email Address femohr@suddenlink.net

SUPPORT CARD 346: F.E. MOHR

Response to Sup 346-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 347**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 347-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Frank & Judy Barna

Address 11146 Lakeshore North ZIP 95602

Phone

Email Address

SUPPORT CARD 347: FRANK AND JUDY BARNA

Response to Sup 347-1

Please see Master Response 1.

Support Card 348

Sup 348-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) FRANK KULCZYK

Address P.O. Box 424, Rough + Ready, Ca. ZIP 95975

Phone 530-701-5606

Email Address N/A.

SUPPORT CARD 348: FRANK KULCZYK

Response to Sup 348-1

Please see Master Response 1.

Support Card 349

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 349-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) FRANK PINER

Address 302 Pleasant St. Grass Valley CA ZIP 95945

Phone (530)913-9096

Email Address frankedwardpiner@gmail.com

SUPPORT CARD 349: FRANK PINER

Response to Sup 349-1

Please see Master Response 1.

Support Card 350

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 350-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) FRANK ROWE

Address 22410 DOG BAR RD G.V. CA ZIP 95949

Phone 530) 913-1477

Email Address

SUPPORT CARD 350: FRANK ROWE

Response to Sup 350-1

Please see Master Response 1.

Support Card 351

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 351-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Frankie CHURCHILL

Address 12303 Martin Rd Grass Valley ZIP 95949

Phone 916 853 3883

Email Address frankie.churchill@spmc.com

SUPPORT CARD 351: FRANKIE CHURCHILL

Response to Sup 351-1

Please see Master Response 1.

Support Card 352



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Fred & Carmen Anderson

Address PO Box 1492 NC ZIP 95959

Phone (530) 265-3844 / (530) 263-4350

Email Address

Sup 352-1

SUPPORT CARD 352: FRED AND CARMEN ANDERSON

Response to Sup 352-1

Please see Master Response 1.

Support Card 353

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 353-1

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Name(s) G & L MITCHELMORE

Address 13384 DRIFTWOOD ZIP 95946

PENN VALLEY, CA

Phone

Email Address ABIGE ATT. NET

SUPPORT CARD 353: G. AND L. MITCHELMORE

Response to Sup 353-1

Please see Master Response 1.

Support Card 354

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 354-1

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Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____



G.P. Combes
P.O. Box 3458
Grass Valley, CA
95945

SUPPORT CARD 354: G.P. COMBES

Response to Sup 354-1

Please see Master Response 1.

Support Card 355

Sup 355-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) GABE ALVARADO

Address 18853 LAKE FOREST DR. PENN VALLEY, CA. 95946 ZIP 959 46

Phone

Email Address

SUPPORT CARD 355: GABE ALVARADO

Response to Sup 355-1

Please see Master Response 1.

Support Card 356

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 356-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gail Corondoni Grass Valley, CA

Address 932 W Main St H 43 ZIP 95945

Phone 818 - 642 - 8646

Email Address

SUPPORT CARD 356: GAIL CORONDONI

Response to Sup 356-1

Please see Master Response 1.

Support Card 357

Sup 357-1

I support re-opening the Idaho-Maryland Mine

YES, PLEASE DO ALL I CAN, PROGRESS!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) GARVIN FRANCIS

Address 15777 Buckeye Rd. ZIP 95959

Phone N/A

Email Address N/A

SUPPORT CARD 357: GARVIN FRANCIS

Response to Sup 357-1

Please see Master Response 1.

Support Card 358

Sup 358-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Gary Benedict

Address 17385 Lake Vera - Purdon Rd ZIP 95959

Phone 530-265-2746

Email Address garybenedict@outlook.com

SUPPORT CARD 358: GARY BENEDICT

Response to Sup 358-1

Please see Master Response 1.

Support Card 359

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 359-1

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Name(s) Gary Benedict

Address 17385 Lake Vera-Purdon Rd ZIP 95959

Phone 530-265-2746

Email Address garybenedict@outlook.com

SUPPORT CARD 359: GARY BENEDICT

Response to Sup 359-1

Please see Master Response 1.

Support Card 360

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 360-1

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Name(s) Gary Benedict

Address 17385 Lake Vera. Purdon Rd ZIP 95959

Phone 530-265-2746

Email Address garybenedict@outlook.com

SUPPORT CARD 360: GARY BENEDICT

Response to Sup 360-1

Please see Master Response 1.

Support Card 361

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 361-1

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Name(s) GARY BERKHEIMER

Address _____ ZIP _____

Phone _____

Email Address _____

SUPPORT CARD 361: GARY BERKHEIMER

Response to Sup 361-1

Please see Master Response 1.

Support Card 362

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 362-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) G. Franza

Address 336 Jan Rd ZIP 95945

Phone 530.477.1916

Email Address GaryLeeFranza@Live.Com

SUPPORT CARD 362: GARY FRANZA

Response to Sup 362-1

Please see Master Response 1.

Support Card 363

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 363-1

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Name(s) Gary H. Jones

Address 20177 Chaparral Circle ZIP 95946

Phone 530-263-1451

Email Address GHAMJO@gmail.com

SUPPORT CARD 363: GARY H. JONES

Response to Sup 363-1

Please see Master Response 1.

Support Card 364

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 364-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) GARY SIROIS

Address 10396 QUAIL CREEK DR GV CA ZIP 95949

Phone 530 263 4320

Email Address gary@qsc-hh.com

SUPPORT CARD 364: GARY SIROIS

Response to Sup 364-1

Please see Master Response 1.

Support Card 365

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 365-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gary Steven Smith

Address 15C[illegible] Hy 20 ZIP 95989

Phone [illegible]

Email Address [illegible]

SUPPORT CARD 365: GARY STEVEN SMITH

Response to Sup 365-1

Please see Master Response 1.

Support Card 366

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 366-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gayle Hannan

Address 534 Linden Ave Grass Valley ZIP 95945

Phone 530 272 2928

Email Address gaylehannan1953@yahoo.com

SUPPORT CARD 366: GAYLE HANNAN

Response to Sup 366-1

Please see Master Response 1.

Support Card 367

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 367-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gayle Hannan

Address 534 Linden Ave ZIP 95945

Phone 530 272 2928

Email Address gaylehannan1953@yahoo.com

SUPPORT CARD 367: GAYLE HANNAN

Response to Sup 367-1

Please see Master Response 1.

Support Card 368

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 368-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Geoffrey Gomes

Address 23798 Chestnut CT., Auburn, CA ZIP 95602

Phone

Email Address geoffreygomes@att.net

SUPPORT CARD 368: GEOFFREY GOMER

Response to Sup 368-1

Please see Master Response 1.

Support Card 369

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 369-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Georgann Russell Resident

Address PO Box 1158 NC ZIP 95945

Phone

Email Address

SUPPORT CARD 369: GEORGANN RUSSELL

Response to Sup 369-1

Please see Master Response 1.

Support Card 370

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 370-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE BEATTY

Address 417 MARSHALL ST. ZIP 95945

Phone 530) 273-5241

Email Address george.beatty59@gmail.com

SUPPORT CARD 370: GEORGE BEATTY

Response to Sup 370-1

Please see Master Response 1.

Support Card 371

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 371-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE KILNER BARBARA LAUDERDALE

Address 13449 RED DOG ROAD N.C. ZIP 95959

Phone 530-478-5806

Email Address GEORGEKILNER@COMCAST.NET.

SUPPORT CARD 371: GEORGE KILNER

Response to Sup 371-1

Please see Master Response 1.

Support Card 372

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 372-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE KILNER BARBARA LAUDERDALE

Address 13449 RED DOG ROAD N.C. ZIP 95959

Phone 530 478 5806

Email Address GEORGEKILNER@COMCAST.NET

SUPPORT CARD 372: GEORGE KILNER

Response to Sup 372-1

Please see Master Response 1.

Support Card 373

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 373-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE KILNER

Address 13449 RED DOG ROAD NC ZIP 95959

Phone 530 478 5806

Email Address GEORGEKILNER@COMCAST.NET

SUPPORT CARD 373: GEORGE KILNER

Response to Sup 373-1

Please see Master Response 1.

Support Card 374

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 374-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) George Loftus III

Address 10110 west drive Grass Valley ZIP 95945

Phone (530) 272-4712

Email Address gloftus3rd@gmail.com

SUPPORT CARD 374: GEORGE LOFTUS III

Response to Sup 374-1

Please see Master Response 1.

Support Card 375

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 375-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) George Loftus

Address 10110 west drive Grass Valley ZIP 95945

Phone

Email Address

SUPPORT CARD 375: GEORGE LOFTUS

Response to Sup 375-1

Please see Master Response 1.

Support Card 376

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 376-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GEORGE MATSON

Address 10143 OWL RD GRASS VALLEY CA 95945 ZIP

Phone

Email Address GEORGE.MATSON1@YAHOO.COM

SUPPORT CARD 376: GEORGE MATSON

Response to Sup 376-1

Please see Master Response 1.

Support Card 377

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 377-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) DEBORAH S BROWN MD
GEORGE E NOOD MD

Address 11739 LAKESHORE NORTH ZIP

Phone AUBURN CA 95602

Email Address georgenood@gmail.com

SUPPORT CARD 377: GEORGE NOUD

Response to Sup 377-1

Please see Master Response 1.

Support Card 378

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) George Sovey

Address PO Box 127 Chicago Park ZIP 95712

Phone 530 273-0196

Email Address Since the place is already a suburban desert - it should have one traditional industry.

Sup 378-1

SUPPORT CARD 378: GEORGE SOVEY

Response to Sup 378-1

Please see Master Response 1.

Support Card 379

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 379-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GERALD & SHEILA GIERSZEWSKI

Address P.O. BOX 607, ROUGH AND READY, CA ZIP 95975

Phone 530-401-4050

Email Address RNRFIRE26@COMCAST.NET

SUPPORT CARD 379: GERALD AND SHEILA GIERSZEWSKI

Response to Sup 379-1

Please see Master Response 1.

Support Card 380

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 380-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gerald Howard Satterfield

Address 539 W Broad St ZIP

Nevada City, CA 95959-2115

Phone

Email Address 4Mp-3364

SUPPORT CARD 380: GERALD HOWARD SATTERFIELD

Response to Sup 380-1

Please see Master Response 1.

Support Card 381

Sup 381-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) GERALD SWARTZ

Address 11982 CHARLES DR ZIP 95949

Phone 530-277-6979

Email Address jerry@SGINSTALL.com

SUPPORT CARD 381: GERALD SWARTZ

Response to Sup 381-1

Please see Master Response 1.

Support Card 382

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 382-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Beverley and Gerald Bushore

Address PO Box 65 - N. San Juan ZIP 95960

Phone

Email Address

SUPPORT CARD 382: GERARD AND BEVERLY BUSHORE

Response to Sup 382-1

Please see Master Response 1.

Support Card 383

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 383-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GERRAD & KELLY CICHOWICZ

Address 279 JOERSCHKE DRIVE # 8 ZIP 95945

Phone 530) 274-1435 530) 263-7393

Email Address gerrad7.62x51@gmail.com

SUPPORT CARD 383: GERARD AND KELLY CICHOWICZ

Response to Sup 383-1

Please see Master Response 1.

Support Card 384

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 384-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GERRY ANDERSON

Address 16661 NORLENE WAY, GRASS VALLEY ZIP 95949

Phone

Email Address GNDANDERSON@EARTHLINK.NET

SUPPORT CARD 384: GERRY ANDERSON

Response to Sup 384-1

Please see Master Response 1.

Support Card 385

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 385-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) GERRY ANDERSON

Address 16661 NORLENE WAY ZIP 95949

Phone 530-274-3935

Email Address gndanderson@EARTHLINK.NET

SUPPORT CARD 385: GERRY ANDERSON

Response to Sup 385-1

Please see Master Response 1.

Support Card 386

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 386-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gina Rogers

Address 10865 Atta St, Grass Valley ZIP 95945

Phone (530) 470-2566

Email Address gina.rogers@co.nevada.ca.us

SUPPORT CARD 386: GINA ROGERS

Response to Sup 386-1

Please see Master Response 1.

Support Card 387

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 387-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GLEN R. CHILESKI Born & raised in S.V., Ca. with Dad working in mines in 1970's at $50 an hour"

Address 11892 Sunrise Dr ZIP

Phone 273-9364 Grass Valley, Ca 95945

Email Address N/A

SUPPORT CARD 387: GLEN R. CHILESKI

Response to Sup 387-1

Please see Master Response 1.

Support Card 388

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 388-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ivia Y. Colon & Glen Weisgerber

Address 17897 Lake Forest DR Penn Valley ZIP CA 95946

Phone

Email Address iycr1974@gmail.com

SUPPORT CARD 388: GLEN WEISGERBER

Response to Sup 388-1

Please see Master Response 1.

Support Card 389

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 389-1

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Name(s) Glen R. Chilcski / GLEN CHILCESKI

Address 11892 SUNRISE LANE, G.V. ZIP 95945

Phone 530 273-9364

Email Address N/A; (DAD WORKED THIS MINE; 35 BORN, & RAISED IN GRASS VALLEY, VET. VN.

SUPPORT CARD 389: GLEN CHILESKI

Response to Sup 389-1

Please see Master Response 1.

Support Card 390

Sup 390-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Glendora Andrews

Address 315 Alta St. Apt L ZIP 95945

Phone 530-575-9937

Email Address glendora@NClending.com

SUPPORT CARD 390: GLENDORA ANDREWS

Response to Sup 390-1

Please see Master Response 1.

Support Card 391

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 391-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) GLENN D. JONES

Address 10940 GOLD HILL DR. GV ZIP 95945

Phone 530-277-3111

Email Address gjhc1981@GMAIL.COM

SUPPORT CARD 391: GLENN D. JONES

Response to Sup 391-1

Please see Master Response 1.

Support Card 392

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 392-1

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Name(s) GLENN D. JONES

Address 10940 GOLDHILL DR. ZIP 95945

Phone 530-277-3111

Email Address

SUPPORT CARD 392: GLENN D. JONES

Response to Sup 392-1

Please see Master Response 1.

Support Card 393

I support re-opening the Idaho-Maryland Mine

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Sup 393-1

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Name(s) GLENN D. JONES

Address 10940 Gold Hill Dr. G.V. ZIP 95945

Phone 530-277-3111

Email Address gjhc1981@gmail.com

SUPPORT CARD 393: GLENN D. JONES

Response to Sup 393-1

Please see Master Response 1.

Support Card 394

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 394-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Glenn Ward & Arletha Richardson

Address 10044 Crestview dr. ZIP 95949

Phone 916 470-2626 & 530-922-7172

Email Address Wardglenn316@gmail.com & richaiesbeagle@aol.net

SUPPORT CARD 394: GLENN WARD

Response to Sup 394-1

Please see Master Response 1.

Support Card 395

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 395-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Glenn & Joyce Woodruff

Address 10176 Valley Oak Ct ZIP 95946

Phone 408-690-5185

Email Address woodghof@gmail.com

SUPPORT CARD 395: GLENN WOODRUFF

Response to Sup 395-1

Please see Master Response 1.

Support Card 396

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____

Phone _____

Email Address _____



Mr. Gordon Ghiglione
13412 Country Heights Dr.
Penn Valley, CA 95946

Sup 396-1

SUPPORT CARD 396: GORDON GHIGLIONE

Response to Sup 396-1

Please see Master Response 1.

Support Card 397

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 397-1

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Name(s) Mr. Gordon J. Ghiglione

Address 13412 Country Heights Dr

Phone Penn Valley, CA 95946

Email Address

SUPPORT CARD 397: GORDON J. GHIGLIONE

Response to Sup 397-1

Please see Master Response 1.

Support Card 398

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 398-1

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Name(s) _____

Address _____

Phone _____

Email Address _____

Mr. Gordon J. Ghiglione
13412 Country Heights Dr
Penn Valley, CA 95946

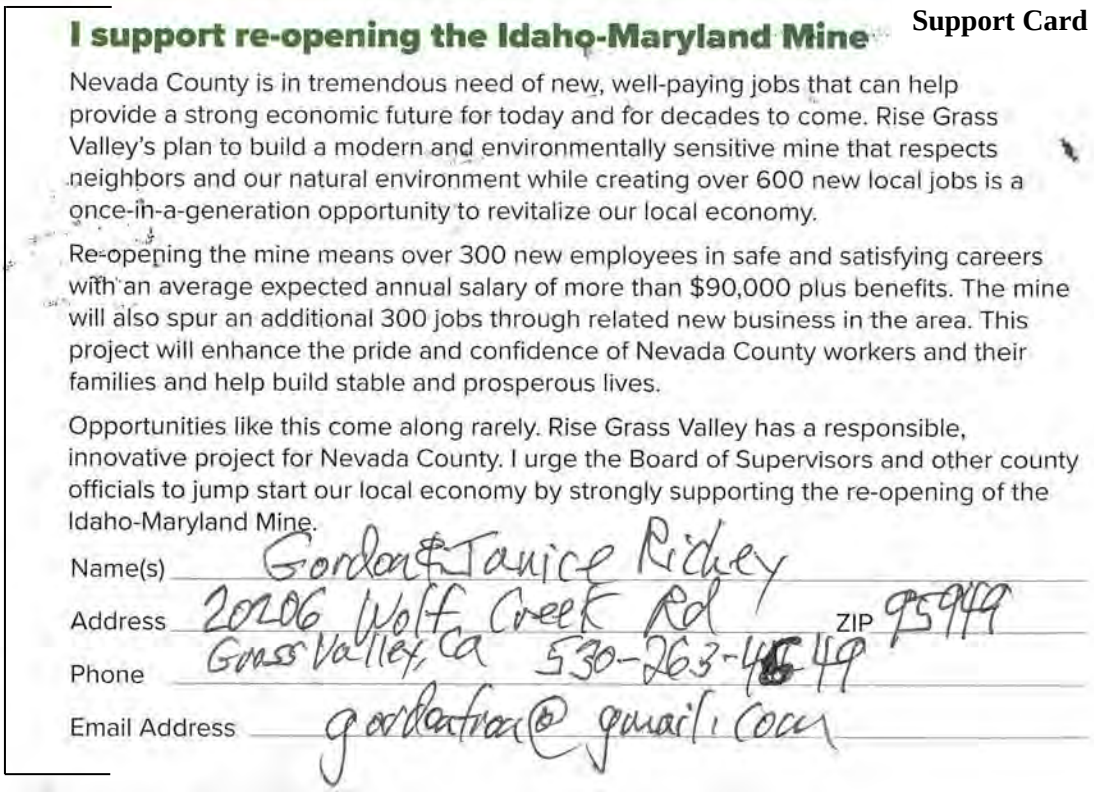
ZIP _____

SUPPORT CARD 398: GORDON J. GHIGLIONE

Response to Sup 398-1

Please see Master Response 1.

Support Card 399



I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gordon & Janice Richey

Address 20206 Wolf Creek Rd ZIP 95949

Phone Grass Valley, Ca 530-263-4549

Email Address gordanfran@gmail.com

Sup 399-1

SUPPORT CARD 399: GORDON AND JANICE RICHEY

Response to Sup 399-1

Please see Master Response 1.

Support Card 400

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 400-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Grady Wilson

Address 332 Horizon Circle ZIP 95945
Grass Valley CA

Phone 530 852 2734

Email Address seekerforall@yahoo.com

SUPPORT CARD 400: GRADY WILSON

Response to Sup 400-1

Please see Master Response 1.

Support Card 401

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 401-1

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Name(s) Greg & Shawn Frederking

Address P.O. Bx 486 ZIP 95975

Phone (530) 432-4197

Email Address GWFrederking@gmail.com

SUPPORT CARD 401: GREG FREDERKING

Response to Sup 401-1

Please see Master Response 1.

Support Card 402

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 402-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Greg & Sharon Gregory

Address 10397 Gaulter Dr. ZIP 95602

Phone 530-269-1149

Email Address Sharngreg@msn.com

SUPPORT CARD 402: GREG GREGORY

Response to Sup 402-1

Please see Master Response 1.

Support Card 403

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Greg & Rachel King

Address 18638 McCourtney Rd Cel CA ZIP 95949

Phone 530-277-7926

Email Address gregking600@yahoo.com

Sup 403-1

SUPPORT CARD 403: GREG AND RACHEL KING

Response to Sup 403-1

Please see Master Response 1.

Support Card 404

Sup 404-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Gregg Millar - Nevada City-CA

Address 13836 Winding Way ZIP 95959

Phone 530-305-4107

Email Address junkminingecomcast.net

SUPPORT CARD 404: GREGG MILLAR

Response to Sup 404-1

Please see Master Response 1.

Support Card 405

Sup 405-1

I support re-opening the Idaho-Maryland Mine

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Name(s) GREG OSBORNE

Address 11419 Prospector RD R&R ZIP 95975

Phone 530-559-7445

Email Address gregorycosborne@gmail.com

SUPPORT CARD 405: GREG OSBORNE

Response to Sup 405-1

Please see Master Response 1.

Support Card 406

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 406-1

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Name(s) Greg Must

Address 18540 Jayhawk Dr. Penn Valley ZIP 95946

Phone

Email Address gmxutil01@gmail.com

SUPPORT CARD 406: GREG MAST

Response to Sup 406-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 407**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 407-1

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Name(s) Gregg Manoogian

Address 18493 Cruzon Road ZIP 95959

Phone 530-478-9181

Email Address

SUPPORT CARD 407: GREGG MANOOGIAN

Response to Sup 407-1

Please see Master Response 1.

Support Card 408

Sup 408-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Gregory R. Pears

Address 12195 Oslo Dr Truckee CA ZIP 96161

Phone

Email Address N114PSO aol.com

SUPPORT CARD 408: GREGONI R. PEARS

Response to Sup 408-1

Please see Master Response 1.

Support Card 409

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 409-1

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Name(s) Gregory R Pesiri

Address 12195 Ojlo Dr Truckee, CA ZIP 96161

Phone (530) 550-1456

Email Address N114PJ@aol.com

SUPPORT CARD 409: GREGONI R. PESIRI

Response to Sup 409-1

Please see Master Response 1.

Support Card 410

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 410-1

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Name(s) Gregory Greg

Address 10397 Gautier Dr ZIP

Phone Auburn, CA 95602-8514

Email Address sharngreg@msn.com

SUPPORT CARD 410: GREGORY GREG

Response to Sup 410-1

Please see Master Response 1.

Support Card 411

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 411-1

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Name(s) Gregory Dennis Morgan

Address 13650 Day Rd Grass Valley CA ZIP 95945

Phone 530-263-7815

Email Address gregmorgan1205@gmail.com

SUPPORT CARD 411: GREGORY DENNIS MORGAN

Response to Sup 411-1

Please see Master Response 1.

Support Card 412

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Gretchen Jane-Clare Swinson

Address 104 Soree Ave. G.V. ZIP 95945

Phone 530. 559. 8599

Email Address luvkuaui@gmail.com

Sup 412-1

SUPPORT CARD 412: GRETCHEN JANE-CLAIRE SWINSON

Response to Sup 412-1

Please see Master Response 1.

Support Card 413

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 413-1

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Name(s) GREYDON H. HICKS

Address 18260 MOUNTAIN PARK CT. ZIP 95949

Phone 925-768-0830

Email Address

SUPPORT CARD 413: GREYDON H. HICKS

Response to Sup 413-1

Please see Master Response 1.

Support Card 414

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 414-1

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Gwena Mc Carthy
10330 Wolf Dr.
Grass Valley, CA 95949

Name(s) _____

Address _____ ZIP _____

Phone 307-670-2047

Email Address gwenamccarthy@gmail.com

SUPPORT CARD 414: GWENA MCCARTHY

Response to Sup 414-1

Please see Master Response 1.

Support Card 415

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Hal Lindvall

Address P.O. Box 2150 Nevada city CA ZIP 95959

Phone 530-210-5574

Email Address halnels@AOL.com

My concern is wells going dry. I wouldn't want to drink city water.

Sup 415-1

SUPPORT CARD 415: HAL LINDVALL

Response to Sup 415-1

Please see Master Response 1.

Support Card 416

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 416-1

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Name(s) HAROLD ANDERSON

Address 10963 SUNRISE HEIGHTS ZIP 95945

Phone 273-9704

Email Address harold.anderson@DACELL.NET

SUPPORT CARD 416: HAROLD ANDERSON

Response to Sup 416-1

Please see Master Response 1.

Support Card 417

I support re-opening the Idaho-Maryland Mine ← Yes!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 417-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. It's Our history, It belongs here!

Name(s) Hazel Myers

Address 17221 Sky Oaks Lane, CA ZIP 95945

Phone 530-277-9939

Email Address Hazel.myers08.gmail.com

SUPPORT CARD 417: HAZEL MYERS

Response to Sup 417-1

Please see Master Response 1.

Support Card 418

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 418-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Heather Houston

Address 1327 East Main St Grass Valley ZIP 95945

Phone

Email Address eyearedreamingnow22@gmail.com

SUPPORT CARD 418: HEATHER HOUSTON

Response to Sup 418-1

Please see Master Response 1.

Support Card 419

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 419-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Helen Hansen

Address 13103 Red Dog Rd, Nevada City ZIP 95959

Phone 265-3495

Email Address

SUPPORT CARD 419: HELEN HANSEN

Response to Sup 419-1

Please see Master Response 1.

Support Card 420

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 420-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Henry and Cathy Tardif

Address 10395 Luna Dr. ZIP 95949

Phone 530-271-2019

Email Address henry_tardif@msn.com

SUPPORT CARD 420: HENRY AND CATHY TARDIF

Response to Sup 420-1

Please see Master Response 1.

Support Card 421

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 421-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) HERB MILLER

Address 13520 TRANQUILITY LN ZIP 95959

Phone 530 913-2128

Email Address MILLERC@JPS.NET

SUPPORT CARD 421: HERB MILLER

Response to Sup 421-1

Please see Master Response 1.

Support Card 422

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 422-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Herman + Barbara Pegoda

Address 121 Northridge Rd ZIP 95945

Phone —

Email Address hbpegoda2@gmail.com

SUPPORT CARD 422: HERMAN PEGODA

Response to Sup 422-1

Please see Master Response 1.

Support Card 423

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 423-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Herman Pegoda

Address 121 Northridge Dr ZIP Grass Valley, CA 95945

Phone

Email Address N/A

SUPPORT CARD 423: HERMAN PEGODA

Response to Sup 423-1

Please see Master Response 1.

Support Card 424

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 424-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Hilton Smith

Address 13005 Rough and Ready Hwy, RR, CA ZIP 95975

Phone 530-370-0689

Email Address hlsmith4@gv.net

SUPPORT CARD 424: HILTON SMITH

Response to Sup 424-1

Please see Master Response 1.

Support Card 425

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 425-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Hope Justice

Address 15195 Sunny Hill ZIP 95949

Phone 530. 401. 6848

Email Address hoperjustice@gmail.com

SUPPORT CARD 425: HOPE JUSTICE

Response to Sup 425-1

Please see Master Response 1.

Support Card 426

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Howard Mordell

Address 15864 Tippy Way G.V. CA ZIP 95949

Phone 510-825-5512

Email Address hwmordelle sbcglobal.net

Sup 426-1

SUPPORT CARD 426: HOWARD MORDELL

Response to Sup 426-1

Please see Master Response 1.

Support Card 427

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) HOWARD KIPKOWSKI

Address PO Box 715 Rough and Ready ZIP 95975

Phone 530 7981486

Email Address kipnowski@digitalpath.net

Sup 427-1

SUPPORT CARD 427: HOWARD RAIKOWSKI

Response to Sup 427-1

Please see Master Response 1.

Support Card 428

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 428-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) HOWARD SIMMONS

Address 15409 FAY RD ZIP 95949

Phone 273-8740

Email Address

SUPPORT CARD 428: HOWARD SIMMONS

Response to Sup 428-1

Please see Master Response 1.

Support Card 429

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 429-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Howard FREELE

Address 10910 Melody Rd. ZIP 95977

Phone 510 812 3542

Email Address hfreele@yahoo.com

SUPPORT CARD 429: HOWARD FREELE

Response to Sup 429-1

Please see Master Response 1.

Support Card 430

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) H P Vaughan

Address 13462 Bitney Springs N.C. Ca ZIP 95958

Phone 530 274 0811

Email Address bevaughan7@gmail.com

Sup 430-1

SUPPORT CARD 430: HP VAUGHAN

Response to Sup 430-1

Please see Master Response 1.

Support Card 431

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 431-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) H P Vaughan

Address 13462 Birney Springs Rd ZIP 95959
Nevada City Ca

Phone 530 274 0811

Email Address bovaughan7@gmail.com

SUPPORT CARD 431: HP VAUGHAN

Response to Sup 431-1

Please see Master Response 1.

Support Card 432

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 432-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Hugh Tower

Address 12701 La Barr Meadows ZIP 95949

Phone 530-913-5427

Email Address GVSATMAN1@GMAIL.COM

SUPPORT CARD 432: HUGH TOWER

Response to Sup 432-1

Please see Master Response 1.

Support Card 433

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 433-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Hugh + Patty Tower

Address 12701 La Barr Meadows ZIP 95949

Phone 530 - 913-5427

Email Address GUSATMANN1[redacted]@GMAIL.COM

SUPPORT CARD 433: HUGH TOWER

Response to Sup 433-1

Please see Master Response 1.

Support Card 434

Sup 434-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ila Dunbar

Address 10195 Kenwood Drive ZIP 95949

Phone

Email Address bully445@jps.net

SUPPORT CARD 434: ILA DUNBAR

Response to Sup 434-1

Please see Master Response 1.

Support Card 435

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 435-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ivan & Lauren Plascencia

Address 10559 Welsh Lane ZIP 95949

Phone 530-648-0627

Email Address ihawk01@gmail.com

SUPPORT CARD 435: IVAN PLASCENCIA

Response to Sup 435-1

Please see Master Response 1.

Support Card 436

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ivia Y. Colon & Glen Weisgerber

Address 17897 Lake Forest DR Penn Valley ZIP CA 95946

Phone

Email Address iycr1974@gmail.com

Sup 436-1

SUPPORT CARD 436: IVIA COLON

Response to Sup 436-1

Please see Master Response 1.

Support Card 437

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 437-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) J.S. ELLSWORTH

Address 10156 DALEWOOD WAY G.V. ZIP 95949

Phone

Email Address ells2276@yahoo.com

SUPPORT CARD 437: J.S. ELLSWORTH

Response to Sup 437-1

Please see Master Response 1.

Support Card 438

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 438-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jack & Patricia Bishop

Address P.O. Box 308 Cedar Ridge ZIP 95924

Phone 530-273-3042

Email Address

SUPPORT CARD 438: JACK BISHOP

Response to Sup 438-1

Please see Master Response 1.

Support Card 439

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 439-1

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Name(s) Mr., Mrs. Jack and Dagmar Cramer

Address 11992 Walnut Ct., Auburn ZIP 95602

Phone

Email Address jackdag24@gmail.com

SUPPORT CARD 439: JACK CRAMER

Response to Sup 439-1

Please see Master Response 1.

Support Card 440

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 440-1

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Name(s) Jack and Dagmar Cramer

Address 11992 Walnut Ct. ZIP 95602

Phone Auburn CA (530) 268-1089

Email Address jackdag24@gmail.com

SUPPORT CARD 440: JACK CRAMER

Response to Sup 440-1

Please see Master Response 1.

Support Card 441

Sup 441-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jack Victor & Karen Crowell

Address 360 Sutton way, #18, G.V. CA ZIP 95945

Phone 530-273-8883

Email Address -N/A-

SUPPORT CARD 441: JACK VICTOR

Response to Sup 441-1

Please see Master Response 1.

Support Card 442

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 442-1

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Name(s) Jack + Patricia Bishop

Address P.O. Bx 308 Cedar Ridge, Ca. ZIP 95924

Phone 530-273-3072

Email Address

SUPPORT CARD 442: JACK BISHOP

Response to Sup 442-1

Please see Master Response 1.

Support Card 443

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 443-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) RON HENLEY, JACKIE SCHLOSSER

Address 3104 RELIEP HILL RD ZIP 95986

Phone 530 - 265 5145

Email Address

SUPPORT CARD 443: JACKIE SCHLOSSER

Response to Sup 443-1

Please see Master Response 1.

Support Card 444

Sup 444-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KATHRYN PENK / JACQUELINE KOCH TURNER

Address 13257 QUAKER HILL X RD. ZIP 95959

Phone 530-777-8648

Email Address 4katepenk@gmail.com

SUPPORT CARD 444: JACQUELINE KOCH-TURNER

Response to Sup 444-1

Please see Master Response 1.

Support Card 445

Sup 445-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jad Funk

Address 14272 Timm Lane ZIP 95959

Phone 530-470-0801

Email Address mrteeney@outlook.com

SUPPORT CARD 445: JAD FUNK

Response to Sup 445-1

Please see Master Response 1.

Support Card 446

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 446-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jaime Reccarens

Address 104 Parkside Pl, Nevada City ZIP 95959

Phone No

Email Address jaimerec5@gmail.com

SUPPORT CARD 446: JAIME RECARENS

Response to Sup 446-1

Please see Master Response 1.

Support Card 447

Sup 447-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAKE DABIS, JEAN CARLI

Address 10912 N. Bloomfield Rd ZIP 95959

Nevada City CA

Phone (530) 265 2816

Email Address

SUPPORT CARD 447: JAKE DABIS

Response to Sup 447-1

Please see Master Response 1.

Support Card 448

Sup 448-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James & Joyce Barbour

Address

Phone 530 - 477 - 8525

Email Address -0-

J Barbour
16169 Tina Ct
Grass Valley, CA 95949

SUPPORT CARD 448: JAMES AND JOYCE BARBOUR

Response to Sup 448-1

Please see Master Response 1.

Support Card 449

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 449-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James T Joyce Barbour

Address 16169 Alna Ct. G.V. Ca. ZIP 95949

Phone 530-477-8525

Email Address [redacted]

SUPPORT CARD 449: JAMES AND JOYCE BARBOUR

Response to Sup 449-1

Please see Master Response 1.

Support Card 450

I support re-opening the Idaho-Maryland Mine YES, GO FOR IT!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 450-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James L. Butler

Address 115 UNION JACK ST. # 73 ZIP 95945

Phone (530) 301-4875

Email Address NO GOT

SUPPORT CARD 450: JAMES L. BUTLER

Response to Sup 450-1

Please see Master Response 1.

Support Card 451

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 451-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James L. Butler GRASS VALLEY

Address 115 Union Jack St. APT #73 ZIP 95945

Phone 530 301-4875

Email Address NO GOT COMPUTER

SUPPORT CARD 451: JAMES L. BUTLER

Response to Sup 451-1

Please see Master Response 1.

Support Card 452

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 452-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James L. Butler

Address 115 Union Jack St APT #73 ZIP 95945

Phone (530) 301-4875

Email Address —

SUPPORT CARD 452: JAMES L. BUTLER

Response to Sup 452-1

Please see Master Response 1.

Support Card 453

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAMES S. GARMIRE

Address 45 CANDY LANE, GRASS VALLEY ZIP 95945

Phone 530-274-1090

Email Address JAMEGARMIRE@GMAIL.COM

Sup 453-1

SUPPORT CARD 453: JAMES GARMIRE

Response to Sup 453-1

Please see Master Response 1.

Support Card 454

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ltdr James T. Griffin

Address 18900 Chickadee Ct ZIP Penn Valley, CA 95946-9220

Phone

Email Address

Sup 454-1

SUPPORT CARD 454: JAMES GRIFFIN

Response to Sup 454-1

Please see Master Response 1.

Support Card 455

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 455-1

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Name(s) JAMES GRILL

Address POB 129 WASHINGTON CA ZIP 95986

Phone

Email Address JGSECRETTREASURE46@gmail.com

SUPPORT CARD 455: JAMES GRILL

Response to Sup 455-1

Please see Master Response 1.

Support Card 456

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 456-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAMES W. HAAN

Address 10204 VALLEY OAK CT. PENN VALLEY ZIP 95946

Phone (925) 209-5148

Email Address DOBERHAAN@YAHOO.COM

SUPPORT CARD 456: JAMES HAAN

Response to Sup 456-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 457**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 457-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAMES H. + PAMELA K HARROLD

Address 502 GRANITE HILL CT. ZIP 95945

Phone 530-263-5797

Email Address SCHALE @ NCCN.NET

SUPPORT CARD 457: JAMES HARROLD

Response to Sup 457-1

Please see Master Response 1.

Support Card 458

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 458-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JAMES KJAER

Address 13672 Piper hill DR Penn Valley ZIP 959464

Phone 530 913-8524

Email Address jimartgal@yahoo.com

SUPPORT CARD 458: JAMES KLAUER

Response to Sup 458-1

Please see Master Response 1.

Support Card 459

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 459-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James Landsburgh

Address 13383 Graeae rd ZIP 95959

Phone 530 346 3523

Email Address Jclandsburgh@gmail.com

SUPPORT CARD 459: JAMES LANDBUSH

Response to Sup 459-1

Please see Master Response 1.

Support Card 460

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 460-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAMES M CLAIN

Address _____ ZIP 95945

Phone 530-838-5681

Email Address JCMAC3523 @gmail

SUPPORT CARD 460: JAMES MCCAWN

Response to Sup 460-1

Please see Master Response 1.

Support Card 461

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) James McKenzie

Address 12270 Rough & Ready HWY Grass Valley ZIP 95945

Phone (530) 559-7185

Email Address jmikem@hotmail.com

Sup 461-1

SUPPORT CARD 461: JAMES MCKENZIE

Response to Sup 461-1

Please see Master Response 1.

Support Card 462

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 462-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JAMES MURRAY

Address 12944 RED DOG ROAD NEVADA CITY ZIP 95959

Phone 530 913-5676

Email Address

SUPPORT CARD 462: JAMES MURRAY

Response to Sup 462-1

Please see Master Response 1.

Support Card 463

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 463-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JAMES QUINTAL

Address 13194 BUNTING WAY ZIP 95946

Phone (408) 590-4194

Email Address JQUINTAL48@GMAIL.COM

SUPPORT CARD 463: JAMES QUINTAL

Response to Sup 463-1

Please see Master Response 1.

Support Card 464

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JAMES SARTORI

Address 13021 LAKE WILDWOOD DR ZIP 95946

Phone

Email Address

Sup 464-1

SUPPORT CARD 464: JAMES SARTORI

Response to Sup 464-1

Please see Master Response 1.

Support Card 465

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 465-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JAMES SELF & LINETTE SELF

Address 11580 MIRROR LAKE COURT, GRASS VALLEY ZIP 95945

Phone (530) 446-0910

Email Address JIM.SELF1951@GMAIL.COM

SUPPORT CARD 465: JAMES AND LINETTE SELF

Response to Sup 465-1

Please see Master Response 1.

Support Card 466

Sup 466-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) James & Karen Slane

Address 23114 Woodhaven Place, Auburn, CA ZIP 95602

Phone 916-205-1748

Email Address 1748 kmslane@gmail.com

SUPPORT CARD 466: JAMES AND KAREN SLANE

Response to Sup 466-1

Please see Master Response 1.

Support Card 467

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 467-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Karen & James Slane

Address 23714 Woodhaven Place, Auburn, Ca ZIP 95602

Phone 1748rmslane@gmail.com

Email Address 916-205-1748

SUPPORT CARD 467: JAMES AND KAREN SLANE

Response to Sup 467-1

Please see Master Response 1.

Support Card 468

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 468-1

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Name(s) JAMES SOTO

Address 14602 OLD WHITE TOLL RD. ZIP

Phone GRASS VALLEY, CA 95945

Email Address jsotoBB@gmail.com

SUPPORT CARD 468: JAMES SOTO

Response to Sup 468-1

Please see Master Response 1.

Support Card 469

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JAMES A. STUDABAKER

Address 18078 ACORN PL G.V. CA. ZIP 95949

Phone [redacted]

Email Address

Sup 469-1

SUPPORT CARD 469: JAMES STUDABAKER

Response to Sup 469-1

Please see Master Response 1.

Support Card 470

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James Sullivan

Address 14284 Hollydale Rd GV ZIP 95945

Phone 530 272-7942

Email Address JStrox@Gmail.com

Sup 470-1

SUPPORT CARD 470: JAMES SULLIVAN

Response to Sup 470-1

Please see Master Response 1.

Support Card 471

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 471-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) James + Angela Williams

Address 26971 State Hwy 49 N.C. ZIP 95959

Phone 530-292-3273

Email Address JWilliams75@att.net

SUPPORT CARD 471: JAMES AND ANGELA WILLIAMS

Response to Sup 471-1

Please see Master Response 1.

Support Card 472

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 472-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Karen Kinne & Dan Hagel

Address 11792 Hidden Valley Rd. ZIP 95949

Phone 530-333-7759

Email Address trailrunner777@gmail.com

SUPPORT CARD 472: JAN HAGEL

Response to Sup 472-1

Please see Master Response 1.

Support Card 473

Sup 473-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Janine Priante

Address 10845 Tyler Foote Rd ZIP 95946

Phone Penn Valley 530 432-3481

Email Address

SUPPORT CARD 473: JANINE PRIANTE

Response to Sup 473-1

Please see Master Response 1.

Support Card 474

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 474-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JANISE JONES

Address P.O. Box 69 - ROUGH & READY, CA. ZIP 95975

Phone 530-432-2065

Email Address Ø

48 year resident in G.V.

SUPPORT CARD 474: JANIS JONES

Response to Sup 474-1

Please see Master Response 1.

Support Card 475

Sup 475-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JANIS E. JONES

Address P.O. BOX 69 R+R ZIP 95975

Phone 530-432-2065

Email Address

SUPPORT CARD 475: JANIS JONES

Response to Sup 475-1

Please see Master Response 1.

Support Card 476

Sup 476-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jared and Kylee Hicks

Address 13118 Stonebridge way ZIP 95945

Phone (530) 513-0346

ail Address HicksJared73@yahoo.com

SUPPORT CARD 476: JARED AND KYLEE HICKS

Response to Sup 476-1

Please see Master Response 1.

Support Card 477

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 477-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JASON BICE

Address POB 176 ZIP 95945

Phone

Email Address

SUPPORT CARD 477: JASON BICE

Response to Sup 477-1

Please see Master Response 1.

Support Card 478

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jason White

Address 10871 Pittsburg Mine Rd Nevada City ZIP 95959

Phone 530 265 4591

Email Address jasonwhite@sierrametal.com

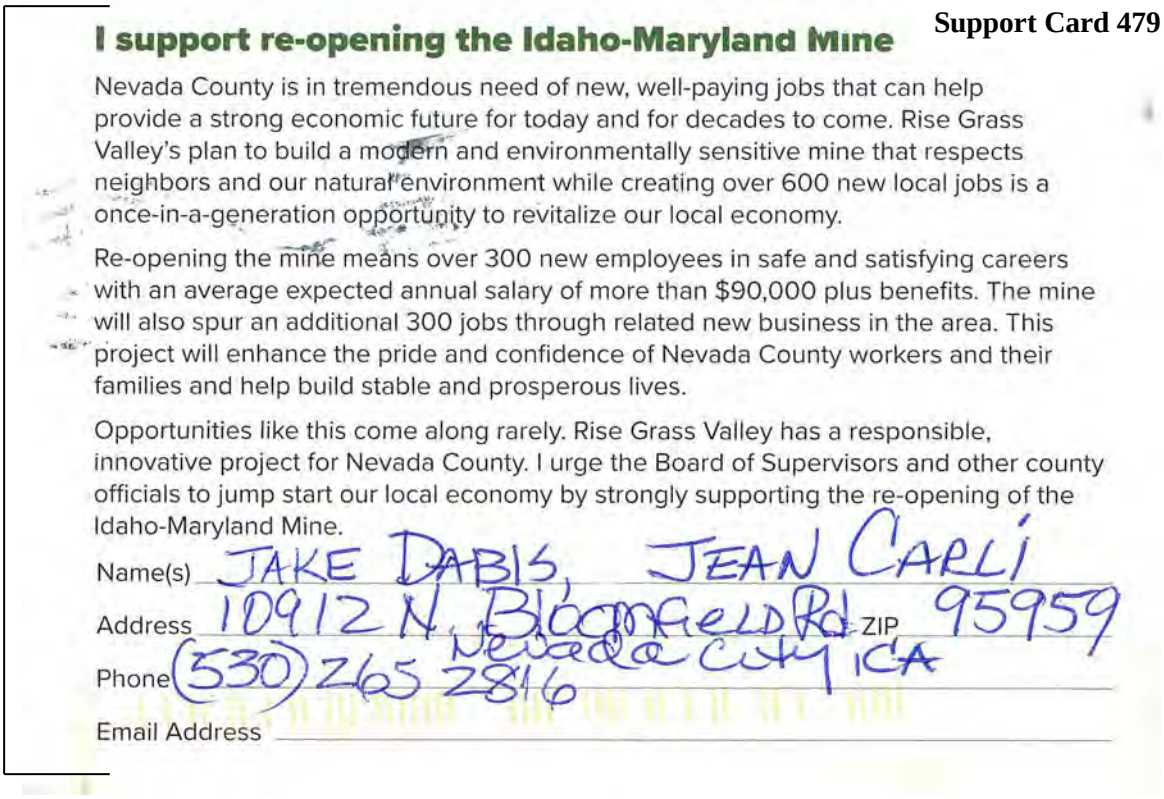
Sup 478-1

SUPPORT CARD 478: JASON WHITE

Response to Sup 478-1

Please see Master Response 1.

Support Card 479



I support re-opening the Idaho-Maryland Mine

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Name(s) JAKE DABIS, JEAN CARLI

Address 10912 N. Bloomfield Rd ZIP 95959

Nevada City CA

Phone (530) 265 2816

Email Address

Sup 479-1

SUPPORT CARD 479: JEAN CARLI

Response to Sup 479-1

Please see Master Response 1.

Support Card 480

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 480-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jedd Caddy

Address 405 Washington St. ZIP 95945

Phone (530) 273-9083

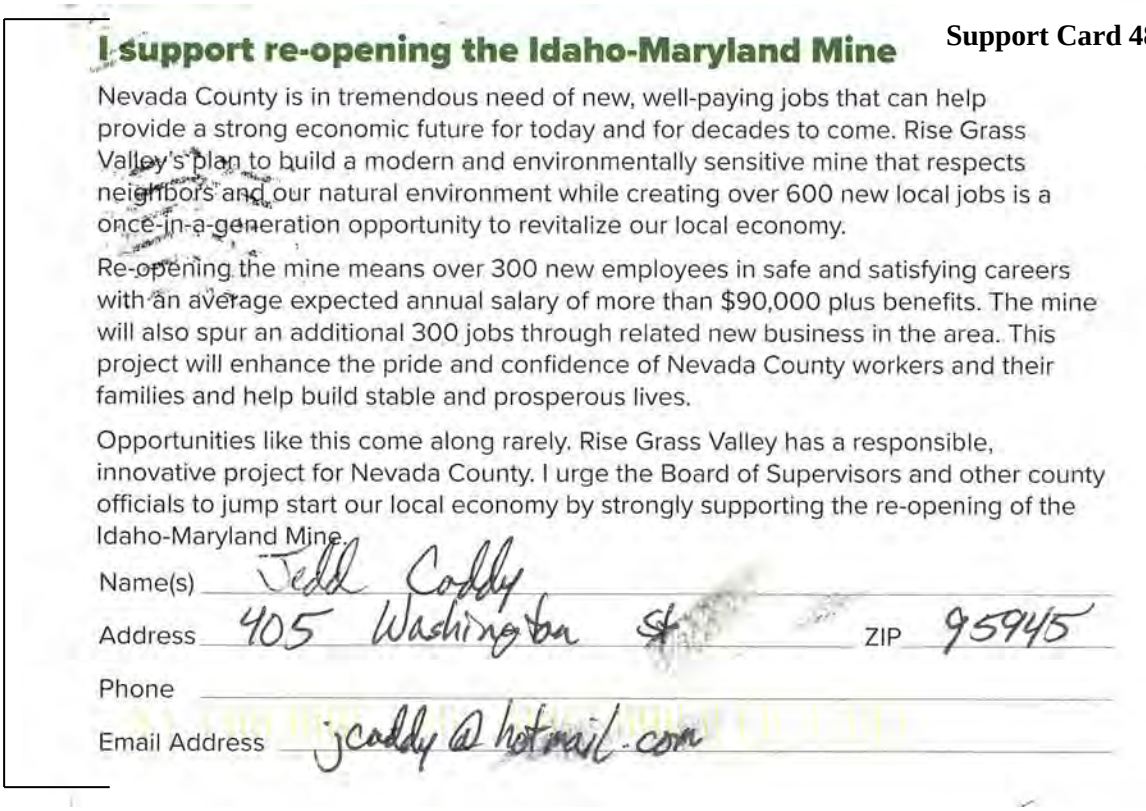
Email Address jcaddy@hotmail.com

SUPPORT CARD 480: JEDD CADDY

Response to Sup 480-1

Please see Master Response 1.

Support Card 481



I support re-opening the Idaho-Maryland Mine

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Name(s) Jedd Caddy

Address 405 Washington St ZIP 95945

Phone

Email Address jcaddy@hotmail.com

Sup 481-1

SUPPORT CARD 481: JEDD CADDY

Response to Sup 481-1

Please see Master Response 1.

Support Card 482

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JEFF BARANSKA

Address 1671 E. MAIN ST #C ZIP 95945

Phone 530-273-5482

Email Address

Sup 482-1

SUPPORT CARD 482: JEFF BARANSKA

Response to Sup 482-1

Please see Master Response 1.

Support Card 483

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 483-1

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Name(s) Jeff & Jayne Biscotti

Address 15903 Shannon Way, Nevada City ZIP 95959

Phone 916-759-7950

Email Address jbiscotti@mail.com

SUPPORT CARD 483: JEFF AND JANE BISCOTTI

Response to Sup 483-1

Please see Master Response 1.

Support Card 484

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 484-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jeff and Beverly Freeman

Address 10277 Carey Dr. ZIP 95945

Phone 530 615 7736

Email Address whatsgooddex@yahoo.com

SUPPORT CARD 484: JEFF AND BEVERLY FREEMAN

Response to Sup 484-1

Please see Master Response 1.

Support Card 485

Sup 485-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JEFF PALM

Address 17740 RETRAC WAY ZIP 95949

Phone 916-216-3514

Email Address ROCKY73J@GMAIL.COM

SUPPORT CARD 485: JEFF PALM

Response to Sup 485-1

Please see Master Response 1.

Support Card 486

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 486-1

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Name(s) JEFF SPENCER

Address 14 CARRIE ANN LN ZIP 95949

Phone 1 916 289 3848

Email Address

SUPPORT CARD 486: JEFF SPENCER

Response to Sup 486-1

Please see Master Response 1.

Support Card 487

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JEFF THOMSEN / SUE THOMSEN

Address PO BOX 212 ZIP 95959

Phone 530 265-5212

Email Address yipyap0702@att.net

Sup 487-1

SUPPORT CARD 487: JEFF AND SUE THOMSEN

Response to Sup 487-1

Please see Master Response 1.

Support Card 488

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 488-1

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Name(s) JEFF S WAGNER

Address 13656 DOG BAR RD ZIP 95949

Phone _____

Email Address _____

SUPPORT CARD 488: JEFF WAGNER

Response to Sup 488-1

Please see Master Response 1.

Support Card 489

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 489-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JEFF WAGNER

Address 13656 DOG BAR RD GV ZIP 95949

Phone

Email Address

SUPPORT CARD 489: JEFF WAGNER

Response to Sup 489-1

Please see Master Response 1.

Support Card 490

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 490-1

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Name(s) Jeff & Kerry Zall

Address 11156 Oak Drive GV ZIP 95949

Phone 530 268-1671

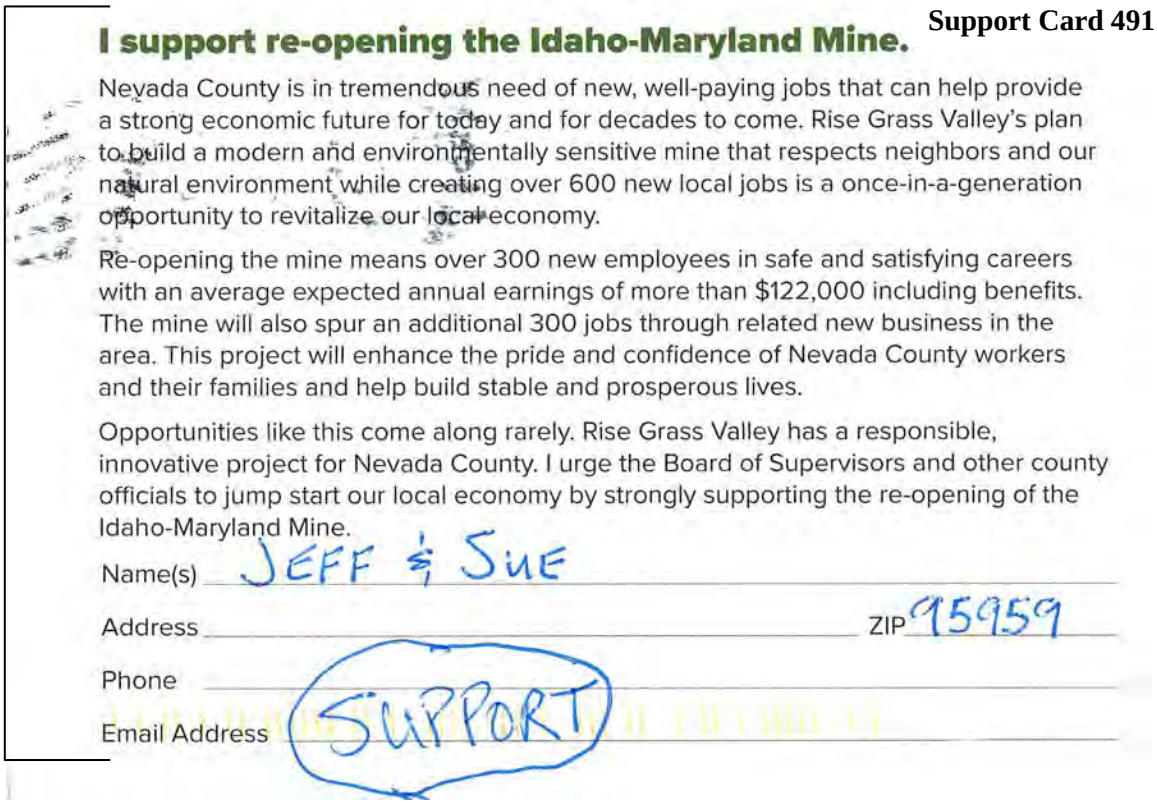
Email Address JeffreyZall@gmail.com

SUPPORT CARD 490: JEFF AND KERRY ZALL

Response to Sup 490-1

Please see Master Response 1.

Support Card 491



I support re-opening the Idaho-Maryland Mine.

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Name(s) JEFF & SUE

Address _____ ZIP 95959

Phone _____

Email Address _____ SUPPORT

Sup 491-1

SUPPORT CARD 491: JEFF AND SUE

Response to Sup 491-1

Please see Master Response 1.

Support Card 492

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 492-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Jeffery G. Hunter

Address 10590 Blower Drive ZIP 95975

Phone Rough and Ready Calif.

Email Address Phone 530-432-1057

SUPPORT CARD 492: JEFFERY G. HUNTER

Response to Sup 492-1

Please see Master Response 1.

Support Card 493

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 493-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jeffery G. Hunter

Address 10590 Brower Drive, Rough and Ready, Cal. ZIP 95975

Phone 530-432-1057

Email Address

SUPPORT CARD 493: JEFFERY G. HUNTER

Response to Sup 493-1

Please see Master Response 1.

Support Card 494

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 494-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Zeth Cooper & Jennifer Peterson

Address 13275 Lost Lake Rd ZIP 95945

Phone 530-320-4958

Email Address Zethcooper@Yahoo.Com

SUPPORT CARD 494: JENNIFER PETERSON

Response to Sup 494-1

Please see Master Response 1.

Support Card 495

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 495-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jenny Crowell

Address 265 Sutton Way # 222 ZIP 95945

Phone (530) 446-6273 / (530) 906-5185

Email Address jennyblueeyes28@gmail.com

SUPPORT CARD 495: JENNY CROWELL

Response to Sup 495-1

Please see Master Response 1.

Support Card 496

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jerel and Karen Shapp

Address 13405 Ridge Rd. Grass Valley ZIP 95945

Phone (530) 273-7441 (530) 615-6651

Email Address Ranchojkjw@gmail.com

Sup 496-1

SUPPORT CARD 496: JEREL AND KAREN SHAPP

Response to Sup 496-1

Please see Master Response 1.

Support Card 497

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 497-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jeremiah Crouse

Address 244 Dorsey Dr. Apt#14 Grass Valley ZIP 95945

Phone (530)955-5493

Email Address

SUPPORT CARD 497: JEREMIAH CROUSE

Response to Sup 497-1

Please see Master Response 1.

Support Card 498

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 498-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jeremy Deterding

Address 11111 Lakeshore South ZIP 95602

Phone

Email Address RCDeter@AOL.com

SUPPORT CARD 498: JEREMY DETERDING

Response to Sup 498-1

Please see Master Response 1.

Support Card 499

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 499-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jerrett + Katherine Davis + family (5 kids)

Address 11983 Hilltop Drive GV, CA ZIP 95949

Phone 916-749-6858

Email Address katherineadavis10@gmail.com

SUPPORT CARD 499: JERRETT AND KATHERINE DAVIS

Response to Sup 499-1

Please see Master Response 1.

Support Card 500

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 500-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JERRY CIRINO

Address 12647 Tyler Foote Hwy G.V. ZIP 95945

Phone 530 277 6192

Email Address jerry.cirino@yahoo.com

SUPPORT CARD 500: JERRY CIRINO

Response to Sup 500-1

Please see Master Response 1.

Support Card 501

Sup 501-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JERRY KARNOW & DEBBIE DAJAS

Address P.O. Box 1745, Rough & Ready ZIP 95975

Phone 530-575-5974 530-432-1962

Email Address Karnowj@gmail.com

SUPPORT CARD 501: JERRY KARNOW

Response to Sup 501-1

Please see Master Response 1.

Support Card 502

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) ① Debbie Dajas
② JERRY KARNOW JR. (Fish & Game Warden - retired)

Address P.O. Box 1745, Rough & Ready ZIP 95975

Phone 530-575-5974

Email Address Karnowj@saber.net

Sup 502-1

SUPPORT CARD 502: JERRY KARNOW

Response to Sup 502-1

Please see Master Response 1.

Support Card 503

Sup 503-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jerry Uhlig

Address 13463 Pine Cone Circle ZIP 95945

Phone 530-277-2691

Email Address wildbearhunter@ymail.com

SUPPORT CARD 503: JERRY UHLIG

Response to Sup 503-1

Please see Master Response 1.

Support Card 504

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 504-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jerry and Martina Uhlig

Address 13463 Pine Cone Circle, GV ZIP 95945

Phone 530-277-2691

Email Address wildbearhunter@ymail.com

SUPPORT CARD 504: JERRY UHLIG

Response to Sup 504-1

Please see Master Response 1.

Support Card 505

Sup 505-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jerry & Veronica Warmerdam

Address 11000 Boulder St. ZIP 95959

Phone

Email Address vwarmerdam@yahoo.com

SUPPORT CARD 505: JERRY WARMERDAN

Response to Sup 505-1

Please see Master Response 1.

Support Card 506

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 506-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jerry Hart

Address 10212 HOWE AVE GRASS VALLEY ZIP 95949-9135

Phone 1530 2632203

Email Address

SUPPORT CARD 506: JERRY SHORT

Response to Sup 506-1

Please see Master Response 1.

Support Card 507

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 507-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jesse Glenn

Address 859 Morgan Ranch Dr. ZIP 95945

Phone

Email Address

SUPPORT CARD 507: JESSE GLENN

Response to Sup 507-1

Please see Master Response 1.

Support Card 508

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 508-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JESSE MCKENNA

Address 10848 BANNER VIEW DR. ZIP 95945

Phone 530-272-2664

Email Address JESSE@STREAMLINECONSTRUCTION.NET

SUPPORT CARD 508: JESSE MCKENNA

Response to Sup 508-1

Please see Master Response 1.

Support Card 509

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 509-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Jesse & Katherine White

Address 18420 Indian Springs Rd. P.V. ZIP 95946

Phone 530-559-2470

Email Address whitethevictor@yahoo.com

SUPPORT CARD 509: JESSE WHITE

Response to Sup 509-1

Please see Master Response 1.

Support Card 510

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jessica Burke

Address 1444 Segsworth way Apt 10 ZIP 95945

Phone 530-575-8559

Email Address [redacted]

Sup 510-1

SUPPORT CARD 510: JESSICA BURLEE

Response to Sup 510-1

Please see Master Response 1.

Support Card 511

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 511-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) J. Miller

Address 22622 Cottage Hill Dr ZIP 95949

Phone 650-867-2262

Email Address Millerdoublee comcast.net

SUPPORT CARD 511: JI MILLER

Response to Sup 511-1

Please see Master Response 1.

Support Card 512

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jill Muhlbach

Address 11453 Cement Hill Nevada City, CA ZIP 95959

Phone n/a

Email Address snofires@aol.com

Sup 512-1

SUPPORT CARD 512: JILL MUHLBACH

Response to Sup 512-1

Please see Master Response 1.

Support Card 513

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 513-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jim Baku

Address 15802 Duggans Rd ZIP 95949

Phone (530) 913-7672

Email Address Jimbaku38@Yahoo.com

SUPPORT CARD 513: JIM BAKU

Response to Sup 513-1

Please see Master Response 1.

Support Card 514

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 514-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jim Lovoy

Address 10048 Daniels Way ZIP 95949

Phone 530-277-8097

Email Address loggersunlimited@Yahoo.com

SUPPORT CARD 514: JIM CURRY

Response to Sup 514-1

Please see Master Response 1.

Support Card 515

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 515-1

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Name(s) Jim Curry

Address 10048 Daniels Way ZIP 95949

Phone 530 477-8211

Email Address loggersunlimited@Yahoo.com

SUPPORT CARD 515: JIM CURRY

Response to Sup 515-1

Please see Master Response 1.

Support Card 516

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 516-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jim DARNELL RVO SAFETY

Address 11908 MORNINGSIDE WAY G.V. CA ZIP 95949

Phone 530-392-0523

Email Address JIMRVOSAFETY@GMAIL.COM

SUPPORT CARD 516: JIM DARNELL

Response to Sup 516-1

Please see Master Response 1.

Support Card 517

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) James (Jim) Darnell

Address 11908 Morningside Way G.V. ZIP 95949

Phone 530-392-0523

Email Address JimDarnell538@Gmail.Com

Sup 517-1

SUPPORT CARD 517: JIM DARNELL

Response to Sup 517-1

Please see Master Response 1.

Support Card 518

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 518-1

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Name(s) JIM + PAM HARROLD

Address 502 GRANITE HILL CT ZIP 95945

Phone 530-263-5797

Email Address SCHALE@NCCN.NET

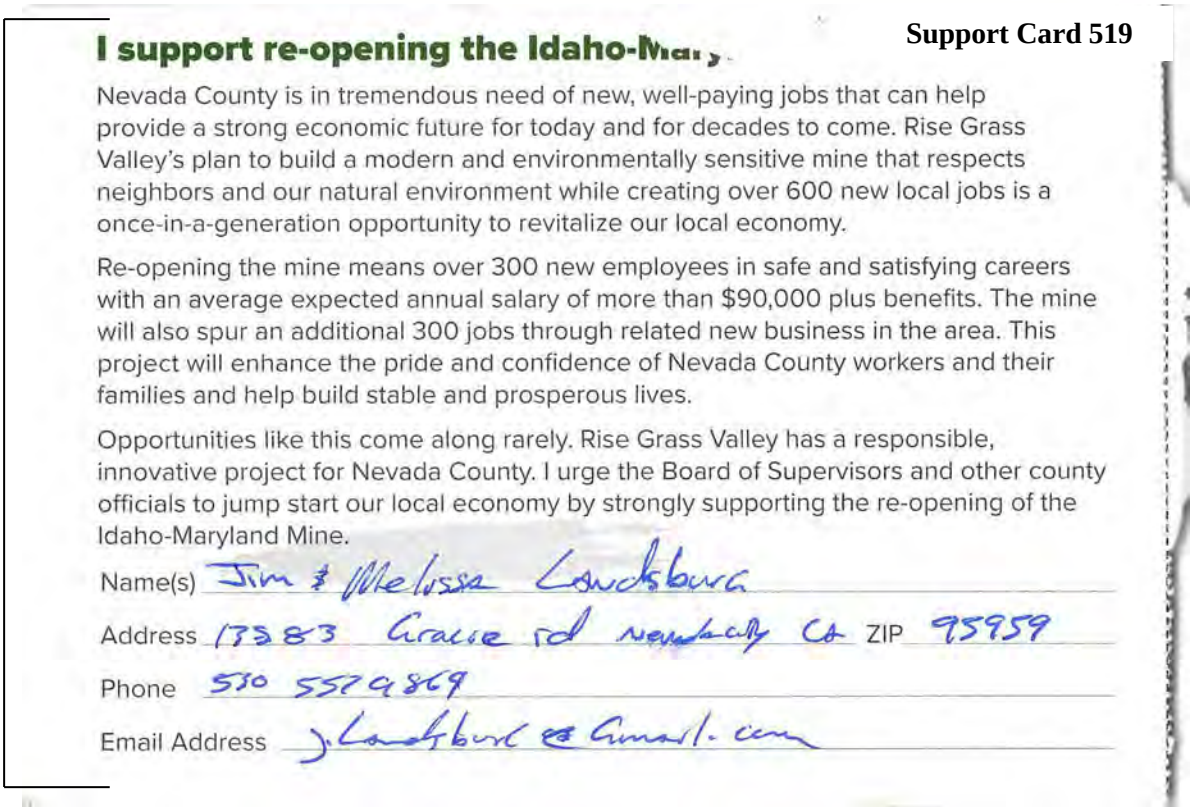
SUPPORT CARD 518: JIM AND PAM HARROLD

Response to Sup 518-1

Please see Master Response 1.

Support Card 519

Sup 519-1



I support re-opening the Idaho-Ma[illegible]

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Name(s) Jim & Melissa Landsburg

Address 13383 Grass rd Nevada City CA ZIP 95959

Phone 530 559 9869

Email Address jlandsburg@gmail.com

SUPPORT CARD 519: JIM AND MELISSA LANDSBURG

Response to Sup 519-1

Please see Master Response 1.

Support Card 520

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 520-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JIM MYERS

Business Century 21 Cornerstone Real Estate Ph 530 277-9141

Address 901 La Barr Meadows Rd GV ZIP 9949

Email Address Jim.Myers@c21cornerstone.com

SUPPORT CARD 520: JIM MEYERS

Response to Sup 520-1

Please see Master Response 1.

Support Card 521

Sup 521-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JIM SELF & LINETTE SELF

Address 11580 MIRROR LAKE CT, GRASS VALLEY CA ZIP 95945

Phone (530) 446-0911

Email Address JIM.SELF1951@GMAIL.COM

SUPPORT CARD 521: JIM SELF

Response to Sup 521-1

Please see Master Response 1.

Support Card 522

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 522-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jim Smith

Address _____ ZIP _____

Phone _____

Email Address 2926pxt@gmail.com

SUPPORT CARD 522: JIM SMITH

Response to Sup 522-1
Please see Master Response 1.

Support Card 523

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 523-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jim & Anna Wilson & Charles Wilson

Address 17270 Apache Ct ZIP 95946

Phone 406 927 3727

Email Address jimwilson1984@yahoo.com sircharleswilson@gmail.com

SUPPORT CARD 523: JIM WILSON

Response to Sup 523-1
Please see Master Response 1.

Support Card 524

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 524-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JIM GEACH LYNN ZANICH

Address 11620 VIA VISTA N.C ZIP 95959

Phone 530-906-7234

Email Address JIMGEACH4[illegible]YAHOO.COM

SUPPORT CARD 524: JIM GEACH

Response to Sup 524-1

Please see Master Response 1.

Support Card 525

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JO ETTA DE SOTO

Address 12981 QUAKER HILL RD. NEVADA CITY ZIP 95959

Phone 530-265-8683

Email Address jocke101@yahoo.com

Sup 525-1

SUPPORT CARD 525: JO DESOTO

Response to Sup 525-1

Please see Master Response 1.

Support Card 526

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JOAN & VICKI BROWN

Address 134 CARPENTER ST ZIP 95945

Phone 5305379587

Email Address JBNDOUTDOORS@YAHOO.COM

Sup 526-1

SUPPORT CARD 526: JOAN BROWN

Response to Sup 526-1
Please see Master Response 1.

Support Card 527

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 527-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joan Dahl

Address 11839 INVERNESS WAY ZIP 95602

Phone 530-401-7007

Email Address N/A

SUPPORT CARD 527: JOAN DAHL

Response to Sup 527-1
Please see Master Response 1.

Support Card 528

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 528-1

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Name(s) Joan Manuel

Address 584 Eskaton Circle G.V. ZIP 95945

Phone

Email Address

SUPPORT CARD 528: JOAN MANUD

Response to Sup 528-1

Please see Master Response 1.

Support Card 529

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 529-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joan O'Donnell

Address 13485 Gold Country DR ZIP 95946

Phone

Email Address joan0d555@comcast.net

SUPPORT CARD 529: JOAN O'DONNELL

Response to Sup 529-1

Please see Master Response 1.

Support Card 530

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 530-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JO ANN BAKU

Address 15792 DUGGANS RD. ZIP 95949

Phone 530 268 0738

Email Address jrbaku1@yahoo.com

SUPPORT CARD 530: JOANN BAKU

Response to Sup 530-1
Please see Master Response 1.

Support Card 531

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 531-1

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Name(s) JoAnn McDermott

Address 12458 Muhlebach ZIP 96161

Phone 530 587 4786

Email Address joanntruckee@gmail.com

SUPPORT CARD 531: JOANN MCDERMOTT

Response to Sup 531-1
Please see Master Response 1.

Support Card 532

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 532-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joanna Fahey Penn Valley

Address 10605 Spring Coulee Ct. ZIP 95946

Phone (530) 432-4955

Email Address flowerchild1939@hotmail.com

SUPPORT CARD 532: JOANNA FAHEY

Response to Sup 532-1
Please see Master Response 1.

Support Card 533

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 533-1

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Name(s) JOANNE BRONN

Address 20076 BEAR RIDGE RD. ZIP 95949

Phone 530-401-5302

Email Address timnjoanne@gmail.com

SUPPORT CARD 533: JOANNE BROWN

Response to Sup 533-1
Please see Master Response 1.

Support Card 534

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 534-1

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Name(s) JOANNE DRUMMOND

Address 11148 LOWER CIRCLE ZIP 95949

Phone 530-913-7757

Email Address jdrummondgv@hotmail.com

SUPPORT CARD 534: JOANNE DRUMMOND

Response to Sup 534-1

Please see Master Response 1.

Support Card 535

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 535-1

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Name(s) Jodi Davis

Address 17844 Huckleberry Dr, Penn Valley ZIP 95946

Phone 530-559-3913

Email Address davisjo63@hotmail.com

SUPPORT CARD 535: JODI DAVIS

Response to Sup 535-1

Please see Master Response 1.

Support Card 536

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 536-1

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Name(s) Jodi Steele Dean Blodgett Joseph Blodgett

Address 10435 Manzanita Drive Grass Valley ZIP 95945

Phone

Email Address

SUPPORT CARD 536: JODI STEELE

Response to Sup 536-1

Please see Master Response 1.

Support Card 537

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 537-1

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Name(s) Jodi Steele

Address 10435 Manzanita Drive ZIP 95945

Phone

Email Address

SUPPORT CARD 537: JODI STEELE

Response to Sup 537-1

Please see Master Response 1.

Support Card 538

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 538-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jody Sweet

Address 11629 Brook Lane Truckee, ZIP 96161

Phone 530/448-1296

Email Address jsweetcabinfever@gmail.com

SUPPORT CARD 538: JODY SWEET

Response to Sup 538-1

Please see Master Response 1.

Support Card 539

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 539-1

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Name(s) JOE BONCHONSKY

Address 11620 LITTLE DEER CREEK LA ZIP 95959

Phone 310-200-7441

Email Address JBONCHONSKY@LITHOGRAPHIX.COM

SUPPORT CARD 539: JOE BONCHONSKY

Response to Sup 539-1

Please see Master Response 1.

Support Card 540

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 540-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Joe Fowler

Address 18642 Augustine Rd ZIP 95959

Phone 530 478 1925

Email Address Kf6hap@aol.com

SUPPORT CARD 540: JOE FOWLER

Response to Sup 540-1

Please see Master Response 1.

Support Card 541

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 541-1

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Name(s) Joe Fowler

Address 18642 Augustine Rd Nevada City, Ca ZIP 95959

Phone 530 478-1925

Email Address Kf6hap@aol.com

SUPPORT CARD 541: JOE FOWLER

Response to Sup 541-1

Please see Master Response 1.

Support Card 542

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 542-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JOE GLICK

Address 315 MONROE ST NEVADA CITY ZIP 95959

Phone 5302655442

Email Address

SUPPORT CARD 542: JOE GLICK

Response to Sup 542-1

Please see Master Response 1.

Support Card 543

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 543-1

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Name(s) JOE GLICK

Address 315 MONROE ST, NEVADA CITY ZIP 95959

Phone

Email Address

SUPPORT CARD 543: JOE GLICK

Response to Sup 543-1

Please see Master Response 1.

Support Card 544

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 544-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JOE GLICK

Address 315 MONROE ST, NEVADA CITY ZIP 95959

Phone 2655442

Email Address

SUPPORT CARD 544: JOE GLICK

Response to Sup 544-1

Please see Master Response 1.

Support Card 545

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 545-1

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Name(s) Joe Taggett

Address 10095 KENWOOD DR G.V ZIP 95949

Phone 530 272 1152

Email Address

SUPPORT CARD 545: JOE LIGGELL

Response to Sup 545-1

Please see Master Response 1.

Support Card 546

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 546-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. I Need A JOB.

Name(s) Joe Heidel

Address P.O. 2934 Grass Valley, CA ZIP 95945

Phone 530-798-3733 CALL JOE I WANT TO WORK AT I-M-M-

Email Address GoldenChain496G.Mail.com

Kathy Whittlesey 17455 Skyland Rd. Nevada City Ca. 95959 whittlesey.kathy@gmail.com 530 265 3659 530 446 5683 Cell

SUPPORT CARD 546: JOE NEIDEL

Response to Sup 546-1

Please see Master Response 1.

Support Card 547

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 547-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joe Reidel

Address PO 2934 Grass Valley CA ZIP 95945

Phone 5307983733 Email Address goldenchain49@gmail.com 530-798-3733

SUPPORT CARD 547: JOE LEIDER

Response to Sup 547-1

Please see Master Response 1.

Support Card 548

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 548-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Alspaugh

Address 16692 Iola Way, G.V. ZIP 95949

Phone 477-5775

Email Address johncalspaugh@gmail.com

SUPPORT CARD 548: JOHN ALSPAUGH

Response to Sup 548-1

Please see Master Response 1.

Support Card 549

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 549-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John R. Bain

Address 19340 Slide Mine Rd. N.S.J. ZIP 95960

Phone 530) 913-9936

Email Address wanderinjohn@hughes.net

SUPPORT CARD 549: JOHN BAIN

Response to Sup 549-1

Please see Master Response 1.

Support Card 550

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 550-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Bennice

Address _____ ZIP 95946

Phone _____

Email Address _____

SUPPORT CARD 550: JOHN BERNICE

Response to Sup 550-1

Please see Master Response 1.

Support Card 551

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John and Susie Butler

Address 12354 Sluice Box Rd.

Phone Penn Valley, CA 95946 ZIP

Email Address Susieilene@yahoo.com



Sup 551-1

SUPPORT CARD 551: JOHN BUTLER

Response to Sup 551-1

Please see Master Response 1.

Support Card 552

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 552-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JOHN CARTER & RITADINA ARRIAGA

Address 10082 THREE SEVENS PL GRASS VALLEY CA ZIP 95949

Phone 530-477-2269

Email Address docjohn46@yahoo.com

SUPPORT CARD 552: JOHN CARTER

Response to Sup 552-1

Please see Master Response 1.

Support Card 553

Sup 553-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MELODY RAGLIN + John Clune

Address 12966 DAISY Blue mine Rd. N.C. ZIP

Phone 530 265-5741

Email Address raglinmia@yahoo.com

SUPPORT CARD 553: JOHN CLUNE

Response to Sup 553-1

Please see Master Response 1.

Support Card 554

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 554-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Delgado

Address 15329 Little Valley Rd. Spc. 51 ZIP 95949

Phone (530) 798-0073

Email Address N/A

SUPPORT CARD 554: JOHN DELGADO

Response to Sup 554-1

Please see Master Response 1.

Support Card 555

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 555-1

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Name(s) JOHN DELGADO

Address 15329 Little Valley Rd SPC# 51 ZIP 95949
Grass Valley, CA.

Phone

Email Address Delgadoboy@mail.com

SUPPORT CARD 555: JOHN DELGADO

Response to Sup 555-1

Please see Master Response 1.

Support Card 556

Sup 556-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) John H. Drew

Address P.O. Box 193 Chicago Park CA ZIP 95712

Phone 530-460-9655

Email Address I want to volunteer 55 yrs experience in Water & Wastewater Cert. # V-2096

SUPPORT CARD 556: JOHN DREW

Response to Sup 556-1

Please see Master Response 1.

Support Card 557

I support re-opening the Idaho-Maryland Mine

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Sup 557-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Eagelston

Address 10651 RAKER CT, AUBURN ZIP 95602

Phone 530 268 1317

Email Address eagelstonjohn@gmail.com

SUPPORT CARD 557: JOHN EAGELSTON

Response to Sup 557-1

Please see Master Response 1.

Support Card 558

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) John ERAMOUSPe

Address 10400 HAWKe LANe Nevada City ZIP 95959

Phone 530 264 6836

Email Address MOOSe41@ATT.MeT

Sup 558-1

SUPPORT CARD 558: JOHN ERAMOUSPE

Response to Sup 558-1

Please see Master Response 1.

Support Card 559

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 559-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Eramouspe

Address 10400 Hawke Lane ZIP 95959

Phone

Email Address Moose41@att.net

SUPPORT CARD 559: JOHN ERAMOUSPE

Response to Sup 559-1

Please see Master Response 1.

Support Card 560

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 560-1

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Name(s) John FAirchild

Address 15136 Beyers Lane ZIP 95949

Phone 530 274 9614

Email Address jafwbs@gmAil.com

SUPPORT CARD 560: JOHN FAIRCHILD

Response to Sup 560-1

Please see Master Response 1.

Support Card 561

Sup 561-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) John Fotinos

Address 13220 Garden Bar Rd ZIP 95949

Phone

Email Address RU101101GMail.com

SUPPORT CARD 561: JOHN FOTINOS

Response to Sup 561-1

Please see Master Response 1.

Support Card 562

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 562-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JOHN GODFREY

Address 108 141 WASHINGTON CA ZIP 95966

Phone 530-557-5290

Email Address JKOTAIL GODFREY @ G MAIL .COM

SUPPORT CARD 562: JOHN GODFREY

Response to Sup 562-1

Please see Master Response 1.

Support Card 563

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 563-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John R Lawless

Address 20112 Echo [illegible] ZIP 95946

Phone 530-432-5279

Email Address

SUPPORT CARD 563: JOHN R. LAWLESS

Response to Sup 563-1

Please see Master Response 1.

Support Card 564

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 564-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John R. Lawless

Address 20112 Echo Blue DR ZIP 95946

Phone 530-432-52277

Email Address

SUPPORT CARD 564: JOHN R. LAWLESS

Response to Sup 564-1

Please see Master Response 1.

Support Card 565

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 565-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Morton

Address 131 Stacey Lane Grass V ZIP 95945

Phone 530-272-2946

Email Address acmgold@att.net

SUPPORT CARD 565: JOHN MORTON

Response to Sup 565-1

Please see Master Response 1.

Support Card 566

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 566-1

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Name(s) John Lekarch - Banner Communications

Address 110 Adams Lane, GV CA ZIP 95945

Phone 530-273-0070

Email Address John@Bannercom.com

SUPPORT CARD 566: JOHN PEKAREK

Response to Sup 566-1

Please see Master Response 1.

Support Card 567

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 567-1

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Name(s) John & Diane Philpot

Address 259 Scotia Pines Circle ZIP 95945

Phone 530-304-4461

Email Address

SUPPORT CARD 567: JOHN PHILPOT

Response to Sup 567-1

Please see Master Response 1.

Support Card 568

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) John Reader

Address 23294 Hwy 49 Nevada City ZIP 95959

Phone

Email Address

Sup 568-1

SUPPORT CARD 568: JOHN READER

Response to Sup 568-1

Please see Master Response 1.

Support Card 569

Sup 569-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) John Rice

Address 12002 SUNSET AVE ZIP 95945

Phone

Email Address

SUPPORT CARD 569: JOHN RICE

Response to Sup 569-1

Please see Master Response 1.

Support Card 570

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 570-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JOHN & SUE SAMPLE

Address 27584 TABLE MEADOW RD AUBURN CA ZIP 95602

Phone 530 269 2434

Email Address SRSAMPLE@GMAIL.COM

SUPPORT CARD 570: JOHN SAMPLE

Response to Sup 570-1

Please see Master Response 1.

Support Card 571

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. Nevada City, CA 95959

Name(s) John & Katrina Sanchez

Address 14686 Echo Ridge Dr ZIP 95959

Phone

Email Address

Sup 571-1

SUPPORT CARD 571: JOHN SANCHEZ

Response to Sup 571-1

Please see Master Response 1.

Support Card 572

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 572-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) JOHN SCHWABECHER

Address 10137 SHAMROCK ZIP 95949

Phone

Email Address

SUPPORT CARD 572: JOHN SCHWABECHER

Response to Sup 572-1

Please see Master Response 1.

Support Card 573

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 573-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) John Tucker

Address 11196 Lakeshore S ZIP Auburn, CA 95602

Phone 5302783404

Email Address

SUPPORT CARD 573: JOHN TUCKER

Response to Sup 573-1

Please see Master Response 1.

Support Card 574

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 574-1

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Name(s) JOHN WADDEN

Address 24954 STATE Hwy 49 ZIP 95602

Phone 530 269 1744

Email Address BIGJOHN19817@GMAIL.COM

SUPPORT CARD 574: JOHN WADDEN

Response to Sup 574-1

Please see Master Response 1.

Support Card 575

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 575-1

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Name(s) JOHN YOUNG

Address 10450 RINCON WAY ZIP 95602

Phone (415) 412-5826

Email Address mac.young@gmail.com

SUPPORT CARD 575: JOHN YOUNG

Response to Sup 575-1

Please see Master Response 1.

Support Card 576

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Jon Costantini

Address E Lime Kiln Rd GV ZIP 95949

Phone —

Email Address —

Sup 576-1

SUPPORT CARD 576: JON CONSTANTIN

Response to Sup 576-1

Please see Master Response 1.

Support Card 577

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 577-1

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Name(s) JON GRAPPI

Address Po Box 92 Nevada City, CA. ZIP 95959

Phone

Email Address

SUPPORT CARD 577: JON GRAPPI

Response to Sup 577-1

Please see Master Response 1.

Support Card 578

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jonathan + Kellie Ettlin

Address 11145 Ringtail Rd, Penn Valley ZIP 95946

Phone (530) 559-1656

Email Address jonnettlin39@yahoo.com

Sup 578-1

SUPPORT CARD 578: JONATHAN AND KELLIE ETTIN

Response to Sup 578-1

Please see Master Response 1.

Support Card 579

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JOSEPH C. ANGUIANO

Address 119 Nuren Lane ZIP 95959

Phone 530-265-4152

Email Address

Sup 579-1

SUPPORT CARD 579: JOSEPH C. ANGUIANO

Response to Sup 579-1

Please see Master Response 1.

Support Card 580

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 580-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joseph C. Angeviano

Address 114 Union Lane ZIP 95959

Phone 530-265-4152

Email Address

SUPPORT CARD 580: JOSEPH C. ANGUIANO

Response to Sup 580-1

Please see Master Response 1.

Support Card 581

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 581-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joseph C. Anguiano

Address 119 Mission St. N.C. Ca. ZIP 95959

Phone 530-2654152

Email Address

SUPPORT CARD 581: JOSEPH C. ANGUIANO

Response to Sup 581-1

Please see Master Response 1.

Support Card 582

Sup 582-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Joseph C Avakenthaler

Address 10485 Bragg Ave Grass Valley CA ZIP 95945

Phone 530-386-1434

Email Address javakenthaler@hofo.org

SUPPORT CARD 582: JOSEPH C. AVEHENTHALER

Response to Sup 582-1

Please see Master Response 1.

Support Card 583

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 583-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JOSEPH C BERGERON & ANNA MARIE MANSFIELD

Address 524 ST PATRICKS DR. ZIP 95945

Phone (530) 446-4316

Email Address N/A

SUPPORT CARD 583: JOSEPH BERGERON

Response to Sup 583-1

Please see Master Response 1.

Support Card 584

Sup 584-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Joseph "Ken" Gaeta

Address 10337 Crestview Dr. G.V. ZIP 95949

Phone 925-864-3300

Email Address ken@silverchacker.net

Chapter 2 – Responses to Comments
Page 2-3917

SUPPORT CARD 584: JOSEPH GAETA

Response to Sup 584-1

Please see Master Response 1.

Support Card 585

Sup 585-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Joseph V Seck

Address 17180 Clover Rd.

Penn Valley, CA 95946-9758 ZIP

Phone 530-273-4574

Email Address

SUPPORT CARD 585: JOSEPH V. SECK

Response to Sup 585-1

Please see Master Response 1.

Support Card 586

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 586-1

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Name(s) Joseph Woulfe

Address 11309 Diamond Back Way, GV CA ZIP 95945

Phone 5306488003

Email Address Woulfeden@comcast.net

SUPPORT CARD 586: JOSEPH WOULFE

Response to Sup 586-1

Please see Master Response 1.

Support Card 587

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Joseph Loulla

Address 11309 Diamond Back Way GV CA ZIP 95945

Phone 5306488003

Email Address loullaeden@comcast.net

need posters & road signs for our side of story.

Sup 587-1

SUPPORT CARD 587: JOSEPH WOULFE

Response to Sup 587-1

Please see Master Response 1.

Support Card 588

I support re-opening the Idaho-Maryland Mine

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Name(s) Joshua & Lindsey Hynie

Address 13258 Rattlesnake Road ZIP 95945

Phone (916) 759-6848

Email Address jhynie1379@gmail.com

Sup 588-1

SUPPORT CARD 588: JOSHUA AND LINDSEY HYNIE

Response to Sup 588-1

Please see Master Response 1.

Support Card 589

I support re-opening the Idaho-Maryland Mine

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Name(s) Joyce & Thomas Shillingburg

Address 10463 Rubicon CT ZIP 95949

Phone

Email Address tomsh@reagon.com

Sup 589-1

SUPPORT CARD 589: JOYCE AND THOMAS SHILLINGBURG

Response to Sup 589-1

Please see Master Response 1.

Support Card 590

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 590-1

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Name(s) LAWRENCE J COLE, JUDITH L. COLE

Address PO BOX 2024 GRASS VALLEY ZIP 95946

Phone 530 802 5044

Email Address COLE LJ@SBCGLOBAL.NET

SUPPORT CARD 590: JUDITH AND LAWRENCE COLE

Response to Sup 590-1

Please see Master Response 1.

Support Card 591

Sup 591-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JUDITH LEE COLE – LAWRENCE I COLE

Address PO Box 2024 ZIP 95946

Phone

Email Address COLELI@SBCGLOBAL.NET

SUPPORT CARD 591: JUDITH LEE COLE AND LAWRENCE I. COLE

Response to Sup 591-1

Please see Master Response 1.

Support Card 592

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Judith Ellis

Address Box 415 N.C. ZIP 95959

Phone 470-9006

Email Address judith.w.ellis@gmail.com

Sup 592-1

SUPPORT CARD 592: JUDITH ELLIS

Response to Sup 592-1

Please see Master Response 1.

Support Card 593

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Judith McBride

Address 131 Eureka St Apt 101 ZIP 95945

Phone 530-263-3676

Email Address jodymcbrd@gmail.com

Sup 593-1

SUPPORT CARD 593: JUDITH MCBRIDE

Response to Sup 593-1

Please see Master Response 1.

Support Card 594

I support re-opening the Idaho-Maryland Mine

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Sup 594-1

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Name(s) Judith A. PARKER

Address 18561 Jayhawk Dr. ZIP 95946

Phone 530-559-5810

Email Address

SUPPORT CARD 594: JUDITH A. PARKER

Response to Sup 594-1

Please see Master Response 1.

Support Card 595

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) JUDY ELLIS

Address 1498 REDWOOD OR ZIP 95945

Phone NO

Email Address NO

Sup 595-1

SUPPORT CARD 595: JUDY ELLIS

Response to Sup 595-1

Please see Master Response 1.

Support Card 596

Sup 596-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Judy Kistner, Jim Ryder

Address 14976 Metcalf Road ZIP 95949

Phone 530-273-5011

Email Address judyxoxo@att.net

SUPPORT CARD 596: JUDY KISTNER AND JIM RYDER

Response to Sup 596-1

Please see Master Response 1.

Support Card 597

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 597-1

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Name(s) JUDY TEN EYCK (LAST NAME & TWO WORDS)

Address 17812 LASSO LOOP, PLEASANT VALLEY ZIP 95946

Phone 530-432-7533 PLEASE, - NO REQUESTS FOR MONEY.

Email Address JATENEYCK@YAHOO.COM

SUPPORT CARD 597: JUDY TEN EYER

Response to Sup 597-1

Please see Master Response 1.

Support Card 598

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ms. Juli Reasor

Address 11137 Willow Valley Rd ZIP Nevada City, CA 95959

Phone 530 277-5822

Email Address

Sup 598-1

SUPPORT CARD 598: JULI REASOR

Response to Sup 598-1

Please see Master Response 1.

Support Card 599

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 599-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Julia AMARAL + MARK STRATE

Address PO Box 1450, Nevada City ZIP 95959

Phone 530-274-1040

Email Address

SUPPORT CARD 599: JULIA AMARAL

Response to Sup 599-1

Please see Master Response 1.

Support Card 600

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Julia Amaral & Mark Strate
P.O. Box 1450
Nevada City, CA 95959

Name(s) _____

Address _____ ZIP _____

Phone 530-274-1040

Email Address JRAMARAL44@gmail.com

Sup 600-1

SUPPORT CARD 600: JULIA AMARAL

Response to Sup 600-1

Please see Master Response 1.

Support Card 601

I ~~support~~ re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 601-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MARK STRATE & JULIA AMARAL

Address PO Box 1450, Nevada City, CA ZIP 95959

Phone 530-277-4640 or 263-1992

Email Address MBSTR8@saber.net

SUPPORT CARD 601: JULIA AMARAL

Response to Sup 601-1

Please see Master Response 1.

Support Card 602

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 602-1

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Name(s) Nicholas & Alyssa Fitting, Justin Krusi

Address 12936 Banner Lava cap Road ZIP 95959

Phone 530-913-2271

Email Address Fittingdesigns@Gmail.com, Fittingdesignsco@Gmail.com

SUPPORT CARD 602: JUSTIN KROSI

Response to Sup 602-1

Please see Master Response 1.

Support Card 603

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 603-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Justin Simkins

Address 123 Richardson apt C ZIP 95945

Phone 530 497 4814

Email Address Justin_Simkins@hotmail

SUPPORT CARD 603: JUSTIN SIMKINS

Response to Sup 603-1

Please see Master Response 1.

Support Card 604

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 604-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Justin Smith

Address 124 Eureka Street ZIP 95945

Phone (530) 798-6723

Email Address smithjustin016@gmail.com

SUPPORT CARD 604: JUSTIN SMITH

Response to Sup 604-1

Please see Master Response 1.

Support Card 605

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 605-1

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Name(s) K. F. Dickey

Address 10566 Combie Rd #6612 ZIP 95602

Phone 530-268-0565 Auburn CA

Email Address jackieleedickey@gmail.com

SUPPORT CARD 605: K.E. DICKEY

Response to Sup 605-1

Please see Master Response 1.

Support Card 606

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 606-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KAEDEN TRACY

Address 10913 GLEN MEADOW DR ZIP 95945

Phone 916-833-9805

Email Address

SUPPORT CARD 606: KAEDEN TRACY

Response to Sup 606-1

Please see Master Response 1.

Support Card 607

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 607-1

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Name(s) KAEDEN TRACY

Address 10913 GLEN MEADOW DR ZIP 95945

Phone N/A

Email Address Kaeden32@yahoo.com

SUPPORT CARD 607: KAEDEN TRACY

Response to Sup 607-1

Please see Master Response 1.

Support Card 608

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 608-1

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Name(s) Kara + Rewa Liller

Address PO Box 1557, Nevada City, Ca. ZIP 95959

Phone 530-613-9442

Email Address KLBooks830@gmail.com

SUPPORT CARD 608: KARA LILLER

Response to Sup 608-1

Please see Master Response 1.

Support Card 609

I support re-opening the Idaho-Maryland Mine

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Sup 609-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jack Victor & Karen Crowell

Address 360 Sutton Way, #18, G.V. CA. ZIP 95945

Phone 530-273-8883

Email Address -N/A-

SUPPORT CARD 609: KAREN CROWELL

Response to Sup 609-1

Please see Master Response 1.

Support Card 610

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 610-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Karen L. Kennedy

Address 222 Washington ST. ZIP 95945

Phone 530-305-9391

Email Address acerain1@icloud.com

SUPPORT CARD 610: KAREN KENNEDY

Response to Sup 610-1

Please see Master Response 1.

Support Card 611

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 611-1

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Name(s) Karen Kinne & Jan Hagel

Address 11792 Hidden Valley Rd. ZIP 95949

Phone 530-333-7759

Email Address trailrunner777@gmail.com

SUPPORT CARD 611: KAREN KINNE

Response to Sup 611-1

Please see Master Response 1.

Support Card 612

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 612-1

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Name(s) Karen & Michael Markulis

Address 10424 Pingree Rd. Grass Valley ZIP 95949

Phone (530) 274-3856

Email Address kmarkulis@aol.com

SUPPORT CARD 612: KAREN MARKULIS

Response to Sup 612-1

Please see Master Response 1.

Support Card 613

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 613-1

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Name(s) Karen Snapp

Address 10270 Gold Dr, ZIP 95945

Phone 530-273-3784

Email Address karensnapp1960@gmail.com

SUPPORT CARD 613: KAREN SNAPP

Response to Sup 613-1

Please see Master Response 1.

Support Card 614

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Karl Blanco

Address 221 Nevada City ZIP 95959

Phone 530.557.0173

Email Address OGSBland.kb@gmail.com.

Sup 614-1

SUPPORT CARD 614: KARL BLANCO

Response to Sup 614-1

Please see Master Response 1.

Support Card 615

I support re-opening the Idaho-Maryland Mine

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Sup 615-1

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Name(s) Karl H. Mayer Jr. & Corraine Emily Plagge

Address 11040 Banner Mine Way ZIP 95959

Phone 323-855-1507

Email Address hankypanky2000@yahoo.com

SUPPORT CARD 615: KARL MEYER

Response to Sup 615-1

Please see Master Response 1.

Support Card 616

Sup 616-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) KARL RESCH

Address 523 MILL STREET ZIP 95945

Phone

Email Address

SUPPORT CARD 616: KARL RESETT

Response to Sup 616-1

Please see Master Response 1.

Support Card 617

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 617-1

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Name(s) Katherine & Robert Eyre

Address 10193 Martis Valley Rd., Unit A ZIP 96161

Phone 267-614-9919 or 215-208-5140

Email Address KMKEYRE@gmail.com

SUPPORT CARD 617: KATHERINE EYRE

Response to Sup 617-1

Please see Master Response 1.

Support Card 618

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 618-1

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Name(s) Kathleen Pimentel

Address 210 King Hiram Ln #203 ZIP 95959

Phone 530-265-5355

Email Address N/A

SUPPORT CARD 618: KATHLEEN PIMENTEL

Response to Sup 618-1

Please see Master Response 1.

Support Card 619

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kathleen & Charles Vold

Address 15510 Bella Sera Ct. ZIP 95945

Phone 530-575-4327

Email Address KandcVold@SuddenLink.net

Sup 619-1

SUPPORT CARD 619: KATHLEEN VOLD

Response to Sup 619-1

Please see Master Response 1.

Support Card 620

Sup 620-1

I support re-opening the Idaho-Maryland Mine.

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Name(s) Kathryn Marie Connolly

Address 10493 King Way ZIP 95949

Phone (530) 263-5827

Email Address KMCKARMA@WIZE@Gmail.com

SUPPORT CARD 620: KATHRYN MARIE CONNOLLY

Response to Sup 620-1

Please see Master Response 1.

Support Card 621

Sup 621-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) KATHRYN PENK / JACQUELINE KOCH TURNER

Address 13257 QUAKER HILL X RD. ZIP 95959

Phone 530-777-8648

Email Address 4katepenk@gmail.com

SUPPORT CARD 621: KATHRYN PENK

Response to Sup 621-1

Please see Master Response 1.

Support Card 622

Sup 622-1

I support re-opening the Idaho-Maryland Mine

SACRAMENTO CA 957
MAR 2022PM 3 L

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) KATHRYN PENK Kathryn Penk

Address 13257 Quaker Hill X Rd ZIP 95959

Phone 530-777-8648

Email Address

SUPPORT CARD 622: KATHRYN PENK

Response to Sup 622-1

Please see Master Response 1.

Support Card 623

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 623-1

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Name(s) Kathy Monteiro Grass Valley

Address 14652 Stinson Dr ZIP 95949

Phone

Email Address Kmonteirodesign@aol.com

SUPPORT CARD 623: KATHY MONTERO

Response to Sup 623-1

Please see Master Response 1.

Support Card 624

Sup 624-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kathy Monteiro Grass Valley

Address 14652 Stinson Dr ZIP 95949

Phone

Email Address Kmonteirodesign@aol.com

SUPPORT CARD 624: KATHY PALMER

Response to Sup 624-1

Please see Master Response 1.

Support Card 625

Sup 625-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. I Need A JOB.

Name(s) Joe Heidel

Address Po. 2934 Grass Valley. CA ZIP 95945

Phone 530.798-3733 CALL Joe I want to work at I-M-M-

Email Address GoldenChain496G.Mail.com

Kathy Whittlesey 17455 Skyland Rd. Nevada City Ca. 95959 whittlesey.kathy@gmail.com 530 265 3659 5304465683 Cell

SUPPORT CARD 625: KATHY WHITTLESEY

Response to Sup 625-1

Please see Master Response 1.

Support Card 626

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 626-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Joe Zeidat

Address PO 2934 Grass Valley CA ZIP 95945

Phone 5307983733 Golden Chain 49@gmail.com

Email Address goldenchain49@gmail.com 530-798-3733

SUPPORT CARD 626: KATHY WHITTLESEY

Response to Sup 626-1

Please see Master Response 1.

Support Card 627

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 627-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kay Swasey

Address 11913 TURKEY PINE Dr. ZIP 95602

Phone 530-320-0935

Email Address ckayscw@suddenlink.net

SUPPORT CARD 627: KAY SWASEY

Response to Sup 627-1

Please see Master Response 1.

Support Card 628

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mr. Keith Atkins

Address 18847 N. Cherry Creek Rd. ZIP

Phone Grass Valley, CA 95949

Email Address

Sup 628-1

SUPPORT CARD 628: KEITH ATKINS

Response to Sup 628-1

Please see Master Response 1.

Support Card 629

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 629-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Keith Cantrell

Address 19 Primrose Lane G.V. ZIP 95945

Phone 530.687.2431

Email Address c.Keith.Cantrell@gmail.com

SUPPORT CARD 629: KEITH CANTRELL

Response to Sup 629-1

Please see Master Response 1.

Support Card 630

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 630-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Keith & Kathy Foran

Address 10556 Combie Rd. 63306 Auburn ZIP 95602

Phone 530-268-2518

Email Address

SUPPORT CARD 630: KEITH AND KATHY FORAN

Response to Sup 630-1

Please see Master Response 1.

Support Card 631

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 631-1

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530-305-7985

Name(s) Bradley Herton, Kelly & Tom Davis

Address 10259 Evergreen Ranch Ct ZIP 95949

Phone 530, 648-8496

Email Address bradleyherton@gmail.com

SUPPORT CARD 631: KELLY DAVIS

Response to Sup 631-1

Please see Master Response 1.

Support Card 632

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kelly Giacomini

Address 12446 Magnolia Rd ZIP 95949

Grass Valley, CA

Phone (530) 268-0252

Email Address schmeelcie@sbcglobal.net

Sup 632-1

SUPPORT CARD 632: KELLY GIACOMINI

Response to Sup 632-1

Please see Master Response 1.

Support Card 633

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 633-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kelly Giacomini

Address 12446 Magnolia Rd ZIP 95949

Phone (530) 268-0252

Email Address Schmookie@SBCglobal.Net

SUPPORT CARD 633: KELLY GIACOMINI

Response to Sup 633-1

Please see Master Response 1.

Support Card 634

Sup 634-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kelly Quinn

Address 21673 Scotts Flat Rd ZIP 95959

Phone

Email Address

SUPPORT CARD 634: KELLY QUINN

Response to Sup 634-1

Please see Master Response 1.

Support Card 635

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 635-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kelly & Dwight Sinclair

Address 12123 Lakeshore N. Auburn ZIP 95602

Phone 530-308-7616

Email Address bakwrdskelly@gmail.com

SUPPORT CARD 635: KELLY AND DWIGHT SINCLAIR

Response to Sup 635-1

Please see Master Response 1.

Support Card 636

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 636-1

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Name(s) Ken Baker

Address 515 Coyote Street Nevada City CA ZIP 95959

Phone

Email Address kbaker@sbcglobal.net

SUPPORT CARD 636: KEN BAKER

Response to Sup 636-1

Please see Master Response 1.

Support Card 637

Sup 637-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) KEN BILDERBACK & FAMILY MEMBERS 100% SUPPORT!

Address 10459 CAREY DR. GRASS VALLEY, CA 95945

Phone 530-400-7979

Email Address KENBILDERBACK@YAHOO.COM

SUPPORT CARD 637: KEN BILDERBACK

Response to Sup 637-1

Please see Master Response 1.

Support Card 638

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 638-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ken Buck

Address 106 Lioster Ave ZIP 95945

Phone

Email Address

SUPPORT CARD 638: KEN BUCK

Response to Sup 638-1

Please see Master Response 1.

Support Card 639

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ken and Darla Draper

Address 213 Gold Point Court GV ZIP 95945

Phone 530-305-7150

Email Address Kenndarr0460@att.net

Sup 639-1

SUPPORT CARD 639: KEN AND DARLA DRAPER

Response to Sup 639-1

Please see Master Response 1.

Support Card 640

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 640-1

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Name(s) Ken Efird

Address 1416 Mulberry Dr. ZIP 95945

Phone

Email Address eefman@sbcglobal.net

SUPPORT CARD 640: KEN EFIRD

Response to Sup 640-1

Please see Master Response 1.

Support Card 641

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 641-1

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Name(s) Ken Efird

Address 1416 Mulberry Dr G.V. ZIP 95945

Phone

Email Address eefman@sbcglobal.net

SUPPORT CARD 641: KEN EFIRD

Response to Sup 641-1

Please see Master Response 1.

Support Card 642

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 642-1

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Name(s) Ken Efird

Address 1416 Mulberry Dr. ZIP 95945

Phone

Email Address eefman@sbcglobal.net

SUPPORT CARD 642: KEN EFIRD

Response to Sup 642-1

Please see Master Response 1.

Support Card 643

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 643-1

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Name(s) Ken Harney

Address 13174 Alder Point G.V. ZIP 95945

Phone 530 798 8510

Email Address

SUPPORT CARD 643: KEN HARNEY

Response to Sup 643-1

Please see Master Response 1.

Support Card 644

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 644-1

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Name(s) KEN WENZE

Address 18616 MORLOCKE WAY ZIP 95949

Phone

Email Address KEN-WENZE@HOTMAIL.COM

SUPPORT CARD 644: KEN WENZE

Response to Sup 644-1

Please see Master Response 1.

Support Card 645

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) KEN & CAROLYN WYMAN

Address 11198 BURJEN Rd, NEVADA CITY, ZIP 95959

Phone 530-265-0211

Email Address KEN WYMAN @ HOTMAIL.COM

Sup 645-1

SUPPORT CARD 645: KEN AND CAROLYN WYMAN

Response to Sup 645-1

Please see Master Response 1.

Support Card 646

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kenneth L. Kemp

Address 13988 Personeni Ln N.C. Ca. ZIP 95959

Phone 530-277-5021

Email Address

Sup 646-1

SUPPORT CARD 646: KENNETH KEMP

Response to Sup 646-1

Please see Master Response 1.

Support Card 647

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kenneth L Marti Bernice Owczarzak

Address 14625 Torrey Pines Drive ZIP 95602

Auburn, CA

Phone 916 508 8834

Email Address krmartidds@hotmail.com

Sup 647-1

SUPPORT CARD 647: KENNETH R. MARTI

Response to Sup 647-1

Please see Master Response 1.

Support Card 648

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 648-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kenneth Roberts

Address 16995 Glenshire Dr. Truckee CA ZIP 96161

Phone 530-587-2074

Email Address robertsken@sbcglobal.net

SUPPORT CARD 648: KENNETH ROBERTS

Response to Sup 648-1

Please see Master Response 1.

Support Card 649

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kenneth M Wyman & Carolyn Parmley-Wyman

Address 11198 Burjee Rd. Nevada City, CA ZIP 95959-9450

Phone 530-265-0211

Email Address kenwyman@hotmail.com

Sup 649-1

SUPPORT CARD 649: KENNETH WYMAN

Response to Sup 649-1

Please see Master Response 1.

Support Card 650

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 650-1

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Name(s) Kevin Blowers

Address Po Box 29 Cedar Ridge CA ZIP 95924

Phone 530 613 6117

Email Address kevinblowers66@yahoo.com

SUPPORT CARD 650: KEVIN BLOWERS

Response to Sup 650-1

Please see Master Response 1.

Support Card 651

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 651-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin Brune

Address 10035 Sunward Way ZIP 95949

Phone Grass Valley CA

Email Address

SUPPORT CARD 651: KEVIN BRUNE

Response to Sup 651-1

Please see Master Response 1.

Support Card 652

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 652-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin + MaryAnn Cayer

Address 21540 Spring Ranches Rd. ZIP 95949

Phone 530-575-9959 – Cell

Email Address Grass Valley CA.

SUPPORT CARD 652: KEVIN CAYER

Response to Sup 652-1

Please see Master Response 1.

Support Card 653

Sup 653-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin & Melissa Cookson

Address PO Box 2688 GV ZIP 95945

Phone 530.263.9507

Email Address Melissa@mavenins.com

SUPPORT CARD 653: KEVIN COOKSON

Response to Sup 653-1

Please see Master Response 1.

Support Card 654

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 654-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Pamela Dobbas / Kevin Heinisch

Address 23775 Hogan Rd. Auburn ZIP 95602

Phone (530) 268-4720

Email Address dobbassw@hotmail.com

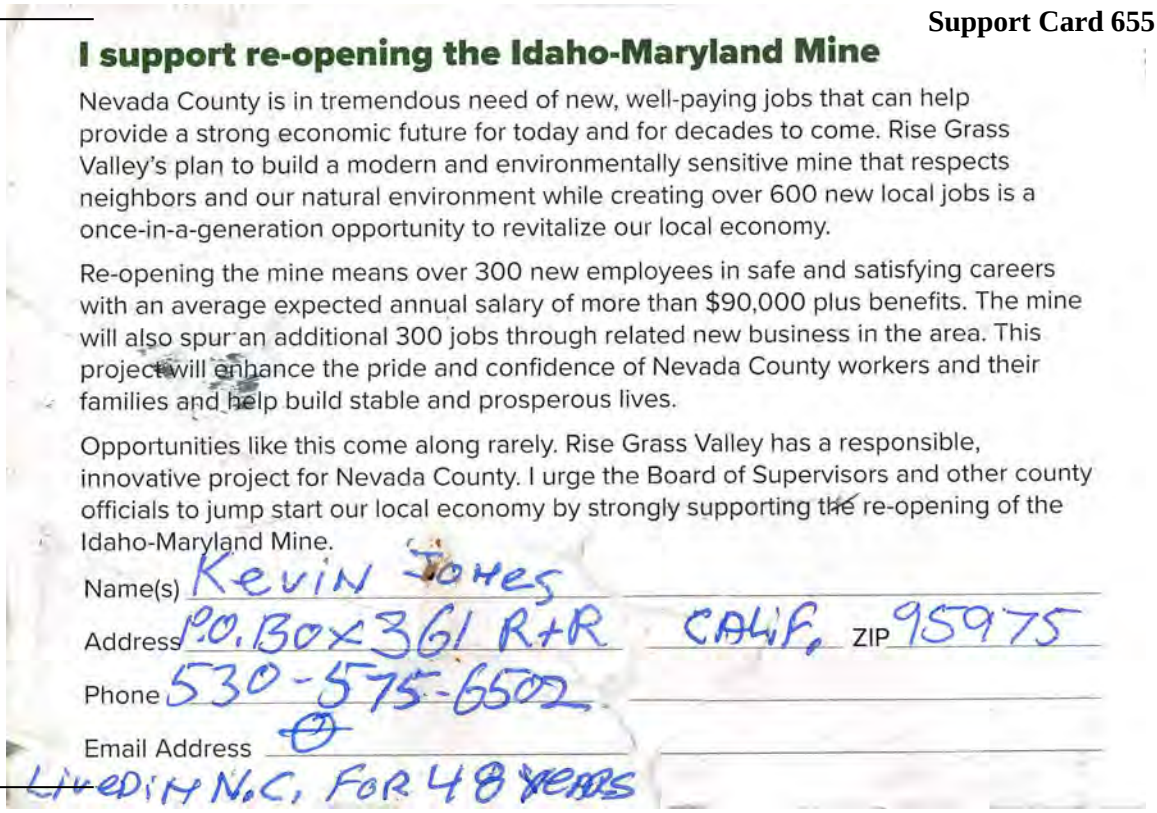
SUPPORT CARD 654: KEVIN HEINISCH

Response to Sup 654-1

Please see Master Response 1.

Support Card 655

Sup 655-1



I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KEVIN JONES

Address P.O. BOX 361 R+R CALIF. ZIP 95975

Phone 530-575-6502

Email Address

LIVED IN N.C. FOR 48 YEARS

SUPPORT CARD 655: KEVIN JONES

Response to Sup 655-1

Please see Master Response 1.

Support Card 656

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 656-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KEVIN JONES

Address P.O. BOX 361 R+R CALIF. ZIP 95975

Phone

Email Address

SUPPORT CARD 656: KEVIN JONES

Response to Sup 656-1

Please see Master Response 1.

Support Card 657

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 657-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin Jones

Address Box 361 Rough and Ready Calif ZIP 95975

Phone 530-575-6502

Email Address None

SUPPORT CARD 657: KEVIN JONES

Response to Sup 657-1

Please see Master Response 1.

Support Card 658

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 658-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin Krikorian

Business 1849 Brewing Company Ph (530) 559-952

Address 468 Sutton Wy Grass Valley CA ZIP 95945

Email Address 1849Brewing(at)gmail.com

SUPPORT CARD 658: KEVIN KRIKORIAN

Response to Sup 658-1

Please see Master Response 1.

Support Card 659

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 659-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kevin & Priscilla Maxwell

Address 12345 Magnolia Rd GV ZIP 95949

Phone 530-277-9089

Email Address cissymax@yahoo.com

SUPPORT CARD 659: KEVIN MAXWELL

Response to Sup 659-1

Please see Master Response 1.

Support Card 660

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 660-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KEVIN McCARTY

Address 11320 ALPINE LANE, GRASS VALLEY, CA ZIP 95945

Phone 530-460-8444

Email Address THEKEVINMCCARTY@MSN.COM

SUPPORT CARD 660: KEVIN MCCARTY

Response to Sup 660-1

Please see Master Response 1.

Support Card 661

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 661-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) KEVIN MCCARTY

Address 11320 ALPINE LANE, GV ZIP 95945

Phone 530-460-8444

Email Address THEKEVINMCCARTY@MSN.COM

SUPPORT CARD 661: KEVIN MCCARTY

Response to Sup 661-1

Please see Master Response 1.

Support Card 662

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kim Herman

Address 20240 Bear Ridge Rd ZIP 95949

Phone 530 277-7865

Email Address hermykp@gmail.com

Sup 662-1

SUPPORT CARD 662: KIM HERMAN

Response to Sup 662-1

Please see Master Response 1.

Support Card 663

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 663-1

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Name(s) Kim Herman

Address 20240 Bear Ridge Rd ZIP 95949

Phone 530 277-7865

Email Address hermsk@gmail.com

SUPPORT CARD 663: KIM HERMAN

Response to Sup 663-1

Please see Master Response 1.

Support Card 664

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 664-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kimber Goodman

Address 17558 Avalon Pl GV ZIP 95949

Phone 530-272-1173 HM

Email Address KimberLgoodman@gmail.com

SUPPORT CARD 664: KIMBER GOODMAN

Response to Sup 664-1

Please see Master Response 1.

Support Card 665

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 665-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kimberly Lovely

Address 200 Dorsey Dr. #20 ZIP 95945

Phone 530-460-9653

Email Address

SUPPORT CARD 665: KIMBERLY LOVELY

Response to Sup 665-1

Please see Master Response 1.

Support Card 666

Sup 666-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) MS. KINDRA NELSON

Address 418 PINE ST., APT. B ZIP GRASS VALLEY, CA 95945

Phone 530-460-7225

Email Address I would like to have a job. Can you please call me for interview

SUPPORT CARD 666: KINDRA NELSON

Response to Sup 666-1

Please see Master Response 1.

Support Card 667

Sup 667-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Kirby DeLaunay

Address PO Box 660 ZIP 95960

Phone 707 718 3781

Email Address —

SUPPORT CARD 667: KIRBY DELAUNAY

Response to Sup 667-1

Please see Master Response 1.

Support Card 668

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 668-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kirk Sensener

Address P.O. Box 1723 Penn Valley ZIP 95946

Phone 530 277 1636

Email Address

SUPPORT CARD 668: KIRK SENSENEY

Response to Sup 668-1

Please see Master Response 1.

Support Card 669

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 669-1

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Name(s) Kris Stepanian + Stephen Stepanian

Address 10282 Old Dairy Pl, Grass Valley ZIP 95945

Phone (530) 913-7496

Email Address krissystep@gmail.com

SUPPORT CARD 669: KRIS AND STEPHEN STEPANIAN

Response to Sup 669-1

Please see Master Response 1.

Support Card 670

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 670-1

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Name(s) KUA ORTMAN

Address 11201 tyler foote Rd ZIP 95959

Phone (530) 470- 3173

Email Address kuaortman@yahoo.com

SUPPORT CARD 670: KUA ORTMAN

Response to Sup 670-1

Please see Master Response 1.

Support Card 671

Sup 671-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) [illegible]

Address [illegible] ZIP [illegible]

Phone

Email Address

SUPPORT CARD 671: KUBBAH B. HOFFMAN

Response to Sup 671-1

Please see Master Response 1.

Support Card 672

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 672-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kurt Graversgaard

Address 18645 N. Cherry Creek Rd. ZIP 95949

Phone (530) 268-0256

Email Address

SUPPORT CARD 672: KURT GRAVERSGAARD

Response to Sup 672-1

Please see Master Response 1.

Support Card 673

Sup 673-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mr. Kurt Meyer

Address 18875 Lake Forest Dr ZIP

Penn Valley CA 95946

Phone

Email Address TREADMILLEMT@GMAIL

SUPPORT CARD 673: KURT MEYER

Response to Sup 673-1

Please see Master Response 1.

Support Card 674

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 674-1

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Name(s) Kurt SenKbeil

Address 594 Butler St. ZIP 95945

Phone 530-848-2478

Email Address KurtsenKbeil@icloud.com

SUPPORT CARD 674: KURT SENKBEIL

Response to Sup 674-1

Please see Master Response 1.

Support Card 675

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Lisa Maria Milone / Kurt Scott

Address 500 Granite Hill Ct#1 Grass Valley, Ca ZIP 95945

Phone 5303664863

Email Address lisamariamilone@gmail.com

Sup 675-1

SUPPORT CARD 675: KURT SCOTT

Response to Sup 675-1

Please see Master Response 1.

Support Card 676

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 676-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Kyle & Caitlin Corchero

Address 14496 Echo Ridge Dr. Nevada City ZIP 95959

Phone

Email Address corcherokyle@yahoo

SUPPORT CARD 676: KYLE CORCHERO

Response to Sup 676-1

Please see Master Response 1.

Support Card 677

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 677-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Kylene Elmwood

Address Po Box 3375 Grass Valley CA ZIP 95945

Phone (530) 263-3306

Email Address Ke62000@gmail.com

SUPPORT CARD 677: KYLENE ELLINWOOD

Response to Sup 677-1

Please see Master Response 1.

Support Card 678

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 678-1

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Name(s) L. Richards

Business Sierra Commercial Electrical Applicators Ph 470-1740

Address PO Box 1953, Nev. City ZIP 95959

Email Address

SUPPORT CARD 678: L. RICHARDS

Response to Sup 678-1

Please see Master Response 1.

Support Card 679

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 679-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) L. J. Will

Address 10792 WALKER DR. GV, CA ZIP 95945

Phone N/A

Email Address N/A

SUPPORT CARD 679: L.J. WILL

Response to Sup 679-1

Please see Master Response 1.

Support Card 680

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 680-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Lance E. Pauly

Address 185 E. Main street #2007 ZIP 95945

Phone

Email Address paulyles@gmail.com

we love Jack

SUPPORT CARD 680: LANCE PAULY

Response to Sup 680-1

Please see Master Response 1.

Support Card 681

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 681-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Larry T Ames

Address 66 Rockwood Dr ZIP 95945

Phone 530-272-7819 Grass Valley Ca.

Email Address N A

SUPPORT CARD 681: LARRY AMES

Response to Sup 681-1

Please see Master Response 1.

Support Card 682

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) LARRY W GROSS

Address 22867 CAMED DR ZIP 95949

Phone 530 268 4181

Email Address ELG66525@GMAIL.COM

Sup 682-1

SUPPORT CARD 682: LARRY GROSS

Response to Sup 682-1

Please see Master Response 1.

Support Card 683

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 683-1

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Name(s) Larry King

Address 13070 Fawn Hill Dr CA ZIP 95945

Phone 530-274-0923

Email Address larryk324@gmail.com

SUPPORT CARD 683: LARRY KING

Response to Sup 683-1

Please see Master Response 1.

Support Card 684

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Larry Packard

Address 11030 Newtown Rd Nevada City ZIP 95959

Phone

Email Address

Sup 684-1

SUPPORT CARD 684: LARRY PACKARD

Response to Sup 684-1

Please see Master Response 1.

Support Card 685

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 685-1

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Name(s) Larry Packard

Address 11080 Newtown Rd ZIP 95959

Phone

Email Address

SUPPORT CARD 685: LARRY PACKARD

Response to Sup 685-1

Please see Master Response 1.

Support Card 686

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Larry and Carol Purciel

Address 16330 ~~Purciel~~ Gibboney Lane ZIP 95949

Phone Grass Valley 530 272-4710

Email Address lcpurciel@nccn.net

Sup 686-1

SUPPORT CARD 686: LARRY PURCIEL

Response to Sup 686-1

Please see Master Response 1.

Support Card 687

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 687-1

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Name(s) LARRY & SANDRA RYAN

Address 20296 BET HILL DR. ZIP 95946
PENN VALLEY, CA

Phone 530-205-7892

Email Address gustavryan@msn.com

SUPPORT CARD 687: LARRY RYAN

Response to Sup 687-1

Please see Master Response 1.

Support Card 688

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Larry M. Starn

Address 13973 Gas Canyon Road ZIP 95959

Phone 530 265-8340

Email Address starn1139@Gmail.com

Sup 688-1

SUPPORT CARD 688: LARRY STARN

Response to Sup 688-1

Please see Master Response 1.

Support Card 689

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Larry & Cindy STowe

Address 430 Pine St ZIP 95945

Phone 530) 477-0264

Email Address

Sup 689-1

SUPPORT CARD 689: LARRY STOWE

Response to Sup 689-1

Please see Master Response 1.

Support Card 690

I support re-opening the Idaho-Maryland Mine

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Sup 690-1

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Name(s) LARRY YOUNGMAN

Address 11465 SQUIRRELL CREEK RD GVCA ZIP 95945

Phone 530 263 8151

Email Address None

SUPPORT CARD 690: LARRY YOUNGMAN

Response to Sup 690-1

Please see Master Response 1.

Support Card 691

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 691-1

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Name(s) Larry King

Address 13070 Fawn Hill Dr ZIP 95945

Phone 808-652-2490 cell; 530-274-0923 home

Email Address larryK324@gmail.com

SUPPORT CARD 691: LARRY KING

Response to Sup 691-1

Please see Master Response 1.

Support Card 692

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 692-1

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Name(s) LARS DROIVOLD

Address 288 BROCK RD. ZIP 95959

Phone 530-265-4445

Email Address

SUPPORT CARD 692: LARS DROIVOLD

Response to Sup 692-1

Please see Master Response 1.

Support Card 693

I support re-opening the Idaho-Maryland Mine

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Sup 693-1

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Name(s) Lars Desivold

Address 228 Brock Rd. Nevada City, CA ZIP 95959

Phone

Email Address

SUPPORT CARD 693: LARS DROIVOLD

Response to Sup 693-1

Please see Master Response 1.

Support Card 694

I support re-opening the Idaho-Maryland Mine

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Name(s) LARS DROINOLD

Address 228 BROCK Rd. NEVADA City, CA ZIP 95959

Phone 530-913-4445 – 530-265-4445

Email Address

Sup 694-1

SUPPORT CARD 694: LARS DROIVOLD

Response to Sup 694-1

Please see Master Response 1.

Support Card 695

I support re-opening the Idaho-Maryland Mine.

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Sup 695-1

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Name(s) Laura + Richard Preece

Address 11999 Tree Top Cir., CA ZIP 95959

Phone 530-205-7955

Email Address rlblcj@comcast.net

SUPPORT CARD 695: LAURA PREECE

Response to Sup 695-1

Please see Master Response 1.

Support Card 696

Sup 696-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LaVonne Ludeman

Address 244 Dorsey DR. #30 ZIP 95945

Phone 530-477-9039

Email Address

SUPPORT CARD 696: LAVONNE LUDIAN

Response to Sup 696-1

Please see Master Response 1.

Support Card 697

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 697-1

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Name(s) LAVONNE LUDIAN

Address 244 DORSEY DR #30 ZIP 95945

Phone 530-477-9039

Email Address LAVONNELUDIAN@GMAIL.COM

SUPPORT CARD 697: LAVONNE LUDIAN

Response to Sup 697-1

Please see Master Response 1.

Support Card 698

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 698-1

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Name(s) Lawrence and Laura Beck

Address 13227 Capitol Drive, Grass Valley ZIP 95945

Phone 530-477-2095

Email Address labeck4@gmail.com

SUPPORT CARD 698: LAWRENCE AND LAURA BECK

Response to Sup 698-1

Please see Master Response 1.

Support Card 699

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 699-1

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Name(s) LAWRENCE MEYERS

Address 70 WENDY CIR. ZIP 95945

Phone 530 271-2025

Email Address

SUPPORT CARD 699: LAWRENCE MEYERS

Response to Sup 699-1

Please see Master Response 1.

Support Card 700

Sup 700-1

I support re-opening the Idaho-Maryland Mine.

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Name(s) Lee Blakemore

Address 18357 Wildflower Dr.

Penn Valley, CA 95946

ZIP

Phone

Email Address

SUPPORT CARD 700: LEE BLAKEMORE

Response to Sup 700-1

Please see Master Response 1.

Support Card 701

Sup 701-1

I support re-opening the Idaho-Maryland Mine

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Name(s) LEE MATTHEWS

Address PO Box 229 Chicago Park ZIP 95712

Phone

Email Address 1961FishnLee@Gmail.Com

SUPPORT CARD 701: LEE MATHEWS

Response to Sup 701-1

Please see Master Response 1.

Support Card 702

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LEE E. TOPE

Address 15402 GARY WAY ZIP 95949

Phone 530-274-0964

Email Address didjplyer@gmail.com

Sup 702-1

SUPPORT CARD 702: LEE TOPE

Response to Sup 702-1

Please see Master Response 1.

Support Card 703

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) LEE ANN TRUMBULL

Address 10288 FOREST SPRINGS DR. G.V. ZIP 95949

Phone 916-501-1113

Email Address trumbull.leeann@gmail.com

Sup 703-1

SUPPORT CARD 703: LEE ANN TRUMBULL

Response to Sup 703-1

Please see Master Response 1.

Support Card 704

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 704-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) LES & KATHY HICKINBOTHAM

Address 12590 PASQUALE ROAD ZIP 95959

Phone

Email Address

SUPPORT CARD 704: LEE AND KATHY HICKINBOTHAM

Response to Sup 704-1

Please see Master Response 1.

Support Card 705

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LES NICHOLSON

Address 11959 SUNSHINE VALLEY RD ZIP 95945

Phone 530-277-3247

Email Address LESGREILET@GMAIL.COM

Sup 705-1

SUPPORT CARD 705: LES NICHOLSON

Response to Sup 705-1

Please see Master Response 1.

Support Card 706

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 706-1

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Name(s) Leslie DeVito

Address 17207 Alexandra Way ZIP Grass Valley, CA 95949

Phone

Email Address LeslieGuidotti@Protonmail.com

SUPPORT CARD 706: LESLIE DEVITO

Response to Sup 706-1

Please see Master Response 1.

Support Card 707

Sup 707-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LESLIE A JACOB

Address 130 OLIVER LN GRASS VALLEY CA 95945-4852 ZIP

Phone 530-575-9983

Email Address lesliejacob@mac.com

SUPPORT CARD 707: LESLIE JACOB

Response to Sup 707-1

Please see Master Response 1.

Support Card 708

Sup 708-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Liberty Sunbear F miner...

Address 18111 old mill Rd. ZIP 95959

Phone 530-802-6844, Bears Firewood, Leave message

Email Address Libertysunbear38@gmail.com

SUPPORT CARD 708: LIBERTY SUNBEAR

Response to Sup 708-1

Please see Master Response 1.

Support Card 709

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 709-1

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Name(s) LINDA COUPER *Nevada County

Address 23270 LONE PINE DR. AUBURN* ZIP 95602

Phone 530-277-9607

Email Address linda@lindacouper.com

SUPPORT CARD 709: LINDA COUPER

Response to Sup 709-1

Please see Master Response 1.

Support Card 710

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 710-1

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Name(s) Linda Keck

Address 12160 Elm Ct, Auburn, CA ZIP 95602

Phone 530-268-9556

Email Address lindakeck@usamedia.tv

SUPPORT CARD 710: LINDA KECK

Response to Sup 710-1

Please see Master Response 1.

Support Card 711

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 711-1

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Name(s) SHAWN ONEILL & LINDA MONTANO

Address PO BOX 678 GV ZIP 95945

Phone 530-330-0274

Email Address sdocon1@gmail.com

SUPPORT CARD 711: LINDA MONTANO

Response to Sup 711-1

Please see Master Response 1.

Support Card 712

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 712-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Linda + Steve Schultz

Address 23054 Moon Ridge Court ZIP 95602

Phone 530-913-5513

Email Address

SUPPORT CARD 712: LINDA AND STEVE SHULTE

Response to Sup 712-1

Please see Master Response 1.

Support Card 713

I support re-opening the Idaho-Maryland Mine.

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Sup 713-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Linda Taylor

Address 11948 Torrey Pines Dr ZIP 95602

Phone 775-530-7521

Email Address lmjd Taylor@outlook.com

SUPPORT CARD 713: LINDA TAYLOR

Response to Sup 713-1

Please see Master Response 1.

Support Card 714

Sup 714-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LINDA THODE

Address 18974 Chuckaw Ct ZIP 95946

Phone

Email Address

SUPPORT CARD 714: LINDA THODE

Response to Sup 714-1

Please see Master Response 1.

Support Card 715

I support re-opening the Idaho-Maryland Mine

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Sup 715-1

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Name(s) LIONEL DEBOISBLANC

Address 13069 NORLENE Way ZIP 95949

Phone _____

Email Address _____

SUPPORT CARD 715: LIONEL DEBOISBLANC

Response to Sup 715-1

Please see Master Response 1.

Support Card 716

I support re-opening the Idaho-Maryland Mine

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Name(s) LIONEL DEBOISBLANC

Address 18069 NORLENE WAY ZIP

GRASS VALLEY, CA 95949-7312

Phone

Email Address

Sup 716-1

SUPPORT CARD 716: LIONEL DEBOISBLANC

Response to Sup 716-1

Please see Master Response 1.

Support Card 717

I support re-opening the Idaho-Maryland Mine

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Name(s) Lisa Maria Milone' / Kurt Scott

Address 500 Granite Hill Ct#1 Grass Valley, Ca ZIP 95945

Phone 5303664863

Email Address lisamariamilone@gmail.com

Sup 717-1

SUPPORT CARD 717: LISA MARIA MILONE

Response to Sup 717-1

Please see Master Response 1.

Support Card 718

Sup 718-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Lori Brady

Address 15985 Retamead Ln ZIP 95949

Phone

Email Address

SUPPORT CARD 718: LORI BRADY

Response to Sup 718-1

Please see Master Response 1.

Support Card 719

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Lori Dana

Address 18724 Wildflower DR ZIP 95946

Phone 530 432 9277

Email Address lacDB52@Comcast.Net

Sup 719-1

SUPPORT CARD 719: LORI DANA

Response to Sup 719-1

Please see Master Response 1.

Support Card 720

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 720-1

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Name(s) LORI AND STEVE MURPHY

Address 10693 STARFIRE Ct. ZIP 95602

Phone (530) 269-1650

Email Address murphy.steve@hotmail.com

SUPPORT CARD 720: LORI AND STEVE MURPHY

Response to Sup 720-1

Please see Master Response 1.

Support Card 721

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 721-1

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Name(s) Lori Peters

Address 244 Dorsey Dr#47 GV, CA ZIP 95945

Phone 274-3880

Email Address ljsumner@sbcglobal.net

SUPPORT CARD 721: LORI PETERS

Response to Sup 721-1

Please see Master Response 1.

Support Card 722

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 722-1

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Name(s) Karl H. Mayer Jr. & Corraine Emily Plagge

Address 11040 Banner Mine Way ZIP 95959

Phone 323-855-1507

Email Address hankypanky2000@yahoo.com

SUPPORT CARD 722: LORRAINE PLAGGE

Response to Sup 722-1

Please see Master Response 1.

Support Card 723

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 723-1

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Name(s) Lou Tavares

Address 20208 You Bet Rd. ZIP 95945

Phone 530 272-4371

Email Address

SUPPORT CARD 723: LOU JANAKOS

Response to Sup 723-1

Please see Master Response 1.

Support Card 724

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 724-1

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Name(s) Lou Linnet & Andre Lubarsky

Address 10069 Linnet Lane, Auburn ZIP 95602

Phone 530-269-0288

Email Address loulinnet@gmail.com

SUPPORT CARD 724: LOU LINNET

Response to Sup 724-1

Please see Master Response 1.

Support Card 725

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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N _____

A _____ ZIP _____

P _____

E _____



Lou & Suzanne Freschi
14123 Maverick Lane
Grass Valley CA 95949-9545

Sup 725-1

SUPPORT CARD 725: LOU AND SUZANNE FRESCHI

Response to Sup 725-1

Please see Master Response 1.

Support Card 726

I support re-opening the Idaho-Maryland Mine

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Name(s) LOUIS BALSAMO

Address 13692 BANNER LAVA CAP RD ZIP 95958
Nevada City CA.

Phone 530 265-0917

Email Address LBJ 46 HAWAII @ YAHOO.COM

Sup 726-1

SUPPORT CARD 726: LOUIS BALSAMO

Response to Sup 726-1

Please see Master Response 1.

Support Card 727

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 727-1

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Name(s) LOUIS A GREENWOOD

Address 27769 TABLE MEADOW RD ZIP 95602

Phone 530-269-1879

Email Address DNPLOUIE@GMAIL.COM

SUPPORT CARD 727: LOUIS GREENWOOD

Response to Sup 727-1

Please see Master Response 1.

Support Card 728

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 728-1

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Name(s) LOUIS GREENWOOD

Address 27769 TABLE MEADOW AUBURN ZIP 95602

Phone 530-269-1879

Email Address DNPLOUIE@GMAIL.COM

SUPPORT CARD 728: LOUIS GREENWOOD

Response to Sup 728-1

Please see Master Response 1.

Support Card 729

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Louise M. Bradley 273-3237

Address 112 Townsend Street ZIP 95945

Phone Grass Valley - 273-3235

Email Address NONE! — NONE! NONE!

Beaudont!

Sup 729-1

SUPPORT CARD 729: LOUISE M. BRADLEY

Response to Sup 729-1

Please see Master Response 1.

Support Card 730

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 730-1

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Name(s) Lucy Galbraith

Address 12166 Echo Dr NC ZIP 95959

Phone

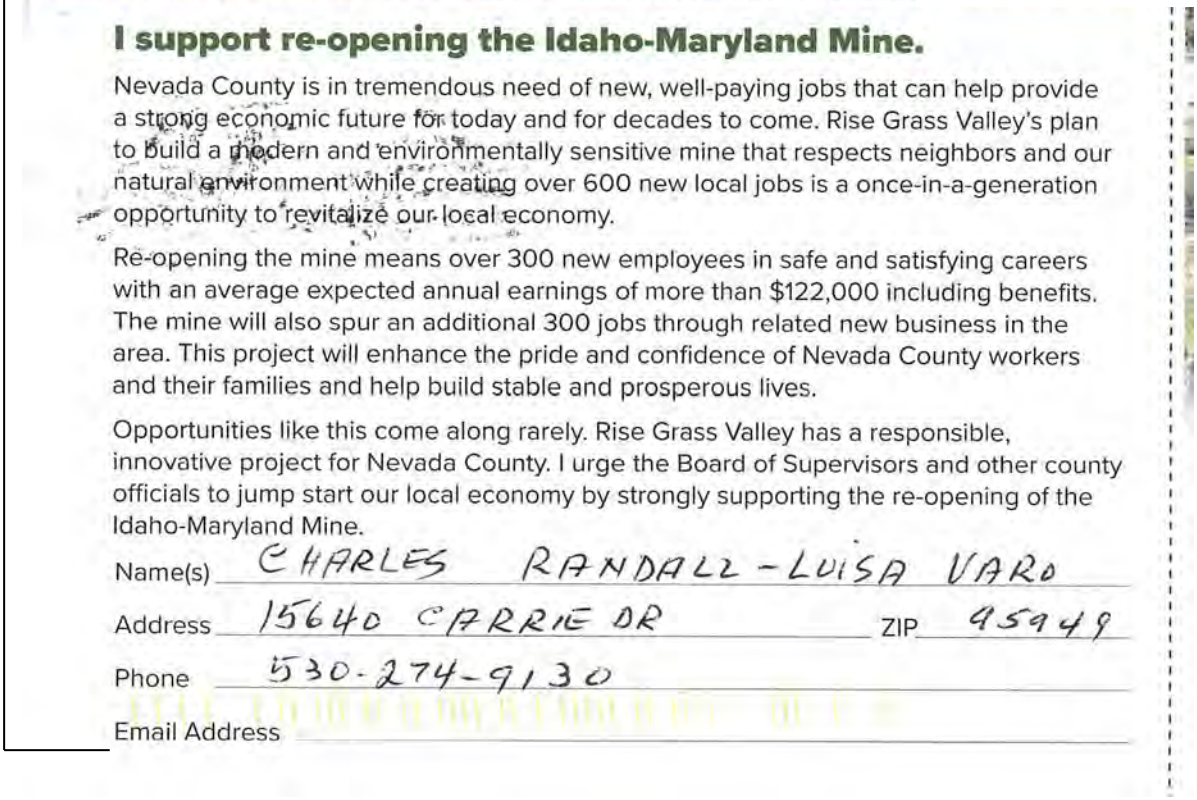
Email Address Lucy.Tova@gmail.com

SUPPORT CARD 730: LUCY GARBRAITH

Response to Sup 730-1

Please see Master Response 1.

Support Card 731



I support re-opening the Idaho-Maryland Mine.

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Name(s) CHARLES RANDALL - LUISA VARO

Address 15640 CARRIE DR ZIP 95949

Phone 530-274-9130

Email Address

Sup 731-1

SUPPORT CARD 731: LOUISA VARO

Response to Sup 731-1

Please see Master Response 1.

Support Card 732

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 732-1

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Name(s) Luke Hale

Address 11210 Ragan Way Grass Valley ZIP 95949

Phone 530-263-0617

Email Address taurus1880@yahoo.com

SUPPORT CARD 732: LUKE HALE

Response to Sup 732-1

Please see Master Response 1.

Support Card 733

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 733-1

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Name(s) Lynn Beck G. V.

Address 168 Woodcrest Hwy ZIP 95945

Phone 530-913-8333

Email Address

SUPPORT CARD 733: LYNN BECK

Response to Sup 733-1

Please see Master Response 1.

Support Card 734

I support re-opening the Idaho-Maryland Mine

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Sup 734-1

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Name(s) Lynn Beck

Address 168 Woodcrest Way ZIP 95945

Phone 530-913-8333

Email Address

SUPPORT CARD 734: LYNN BECK

Response to Sup 734-1

Please see Master Response 1.

Support Card 735

Sup 735-1

I support re-opening the Idaho-Maryland Mine

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Name(s) DAVE MATSON / LYNN HEYES

Address 14254 BANNIEN LAVA CAP ZIP 95959

Phone 530-362-9000

Email Address DMMATSON@DMCEINC.COM

DMCE

WOULD LIKE A NO MINE YARD SIGN

SUPPORT CARD 735: LYNN HEYES

Response to Sup 735-1

Please see Master Response 1.

Support Card 736

Sup 736-1



I support re-opening the Idaho-Maryland Mine

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Name(s) LYNN M. ZANISICH

Address 11620 VIA VISTA NEVADA CITY ZIP 95959

Phone 530-265-3644

Email Address LYNN_ZANISICH@YAHOO.COM

SUPPORT CARD 736: LYNN ZANKICH

Response to Sup 736-1

Please see Master Response 1.

Support Card 737

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 737-1

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Name(s) JIM GEACH LYNN ZANICH

Address 11620 VISTA N.C ZIP 95959

Phone 530-906-7234

Email Address JIMGEACH48@YAHOO.COM

SUPPORT CARD 737: LYNN ZANKICH

Response to Sup 737-1

Please see Master Response 1.

Support Card 738

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mr. M. Andreasen

Address P.O.Box 282 ZIP 95960

Phone 530-615-8097

Email Address markblandnursery@Gmail.com

Sup 738-1

SUPPORT CARD 738: M. ANDREASEN

Response to Sup 738-1

Please see Master Response 1.

Support Card 739

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) M. McEwen

Address PO Box 2105 ZIP 95959

Phone

Email Address mike@nevadacitymass.com

Sup 739-1

SUPPORT CARD 739: M. MCEWEN

Response to Sup 739-1

Please see Master Response 1.

Support Card 740

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 740-1

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Name(s) Madeline Bartorillo

Address 11912 Francis Dr Grass Valley CA ZIP 95949

Phone 530 615 9177

Email Address mbartorillo1@gmail.com

SUPPORT CARD 740: MADELINE BARTORILLO

Response to Sup 740-1

Please see Master Response 1.

Support Card 741

Sup 741-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Mandy McLloyd

Address 13598 Quaker Hill X Rd ZIP 95959

Phone 530-265-1946

Email Address —

SUPPORT CARD 741: MANDY MCLLOYD

Response to Sup 741-1

Please see Master Response 1.

Support Card 742

Sup 742-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Manfred H Weil

Address 11644 Rainbow Rd ZIP 95949

Phone

Email Address fredweil@sbcglobal.net

SUPPORT CARD 742: MANFRED H. WEIL

Response to Sup 742-1

Please see Master Response 1.

Support Card 743

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 743-1

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Name(s) Manuel Resendez JR.

Address 16956 CABRERA RD. GRASS Valley CA. ZIP 95949

Phone 213 - 908 - 9883

Email Address MANNYTIMEZ123.@gMail.coM

SUPPORT CARD 743: MANUEL RECENDEZ JR.

Response to Sup 743-1

Please see Master Response 1.

Support Card 744

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Marc Davis

Address 19078 Wildflower Dr. Penn Valley, CA ZIP 95946

Phone (530) 913-7532

Email Address davismmdj@comcast.net

Sup 744-1

SUPPORT CARD 744: MARC DAVIS

Response to Sup 744-1

Please see Master Response 1.

Support Card 745

I support re-opening the Idaho-Maryland Mine

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Sup 745-1

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Name(s) Mara & Karen Mikan

Address 16763 Scott Way GV Ca. ZIP 95949

Phone

Email Address mtmikan@att.net

SUPPORT CARD 745: MARC AND KAREN MIKAN

Response to Sup 745-1

Please see Master Response 1.

Support Card 746

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 746-1

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Name(s) Marcus E ADKISON

Address 12500 Cowhills Rd. ZIP 95959

Phone 916 869 4328

Email Address Marcus Adkison 317 @ Gmail

SUPPORT CARD 746: MARCUS E. ADKISON

Response to Sup 746-1

Please see Master Response 1.

Support Card 747

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) MARGARET E. BURLEW

Address 10407 CAREY DR ZIP 95945

Phone —

Email Address —

MY GRAND FATHER WAS MINER

Sup 747-1

SUPPORT CARD 747: MARGARET E. BURLEW

Response to Sup 747-1

Please see Master Response 1.

Support Card 748

I support re-opening the Idaho-Maryland Mine

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Name(s) MARGARET E. BURLEW

Address P.O.BOX361 ZIP 95945

Phone unlisted

Email Address

Sup 748-1

SUPPORT CARD 748: MARGARET E. BURLEW

Response to Sup 748-1

Please see Master Response 1.

Support Card 749

I support re-opening the Idaho-Maryland Mine !!

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Sup 749-1

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Name(s) MARGARET & STEVE HARCOURT

Address PO BOX 4039 PASO ROBLES, CA ZIP 93447-4039

Phone 530-320-3497

Email Address mharcourt@live.com

SUPPORT CARD 749: MARGARET AND STEVE HARCOURT

Response to Sup 749-1

Please see Master Response 1.

Support Card 750

I heartily support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Margaret Urke

Address 13914 Day Spring Rd. ZIP 95945

Phone 530 272-1217

Email Address MARGARETURKE@GMAIL.COM

Sup 750-1

SUPPORT CARD 750: MARGARET URKE

Response to Sup 750-1

Please see Master Response 1.

Support Card 751

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) MARIA Auxiliadora Centeno Vasquez

Address 275 Darsey Drive, Grass Valley, CA ZIP 95945

Phone 530-460-9038 only response

Email Address

Sup 751-1

SUPPORT CARD 751: MARIA AUXILIADORA

Response to Sup 751-1

Please see Master Response 1.

Support Card 752

Protect Our History !!!!

I support re-opening the Idaho-Maryland Mine

3-30-22 SP

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 752-1

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Name(s) Mariah Romero

Address 12874 Smack Rd Grass Valley ZIP 95949

Phone (530) 559-6670

Email Address Foxraelngchick88@hotmail.com

SUPPORT CARD 752: MARIAH ROMERO

Response to Sup 752-1

Please see Master Response 1.

Support Card 753

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Marie Wegener Camacho & Sean Reynolds

Address 18773 Easy St. Penn Valley, CA ZIP 95946

Phone

Email Address

Sup 753-1

SUPPORT CARD 753: MARIE CAMAEDA

Response to Sup 753-1

Please see Master Response 1.

Support Card 754

I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Marja Miller

Address 20321 Dog Bar Rd ZIP 95949

Phone (916) 488 6878

Email Address marjaroti@hotmail.com

Sup 754-1

SUPPORT CARD 754: MARJA MILLER

Response to Sup 754-1

Please see Master Response 1.

Support Card 755

I support re-opening the Idaho-Maryland Mine

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Sup 755-1

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Name(s) Mark & Susan Bauman

Address 17800 Cooper Rd. Nevada City, CA ZIP 95959

Phone 530-265-3731

Email Address markjbauman@sbcglobal.net

SUPPORT CARD 755: MARK AND SUSAN BAUMAN

Response to Sup 755-1

Please see Master Response 1.

Support Card 756

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 756-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-M

Name(s) Mark Davis

Address Century 21 Davis Realty
901 La Barr Meadow Rd Suite A
Grass Valley, California 95949

ZIP

Phone 530-798-3063

Email Address markdavisrealtor60@gmail.com

SUPPORT CARD 756: MARK DAVIS

Response to Sup 756-1

Please see Master Response 1.

Support Card 757

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 757-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mr. Mark Steven Di Salvo

Address 187 Highlands Ct. ZIP 95945

Phone 530-477 8570 477-8570

Email Address

SUPPORT CARD 757: MARK DI SALVO

Response to Sup 757-1

Please see Master Response 1.

Support Card 758

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mark Conge

Address 10875 Sunrise Heights ZIP 95946

Phone 530-272-1009

Email Address

Sup 758-1

SUPPORT CARD 758: MARK GAGE

Response to Sup 758-1

Please see Master Response 1.

Support Card 759

I support re-opening the Idaho-Maryland Mine

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Name(s) Mark + Laura Kendall

Address 20100 Rumford Ct ZIP 95945

Phone

Email Address Kendalllaura1958@gmail.com

Sup 759-1

SUPPORT CARD 759: MARK AND LAURA KENDALL

Response to Sup 759-1

Please see Master Response 1.

Support Card 760

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 760-1

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Name(s) MARK KISER

Address P.O. Box 7345 Truckee ZIP 96160

Phone 530 587 1615

Email Address do not have E-mail

SUPPORT CARD 760: MARK KISER

Response to Sup 760-1

Please see Master Response 1.

Support Card 761

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mark Kubich

Address 10972 Mountaineer Trail. ZIP 95945

Phone (530) 272-3226

Email Address

Sup 761-1

SUPPORT CARD 761: MARK KUBICH

Response to Sup 761-1

Please see Master Response 1.

Support Card 762

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mark Tonge

Address 10875 Sunrise Heights ZIP 95946

Phone 530-272-1009

Email Address

Sup 762-1

SUPPORT CARD 762: MARK PAYE

Response to Sup 762-1

Please see Master Response 1.

Support Card 763

I support re-opening the Idaho-Maryland Mine

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Name(s) Mark Robertson

Address 14173 Maverick Ln ZIP 95959

Phone

Email Address

Sup 763-1

SUPPORT CARD 763: MARK ROBERTSON

Response to Sup 763-1

Please see Master Response 1.

Support Card 764

I support re-opening the Idaho-Maryland Mine

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Name(s) Mark STOUTNER

Address 11909 Heather Ln GV CA ZIP 95949

Phone 530-277-8251

Email Address

Sup 764-1

SUPPORT CARD 764: MARK STOUTNER

Response to Sup 764-1

Please see Master Response 1.

Support Card 765

I support re-opening the Idaho-Maryland Mine

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Sup 765-1

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Name(s) Mark Stoutner

Address 11209 Heather Ln. ZIP 95949

Phone Grass Valley CA

Email Address Ø

SUPPORT CARD 765: MARK STOUTNER

Response to Sup 765-1

Please see Master Response 1.

Support Card 766

I ~~support~~ re-opening the Idaho-Maryland Mine

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Name(s) MARK STRATE & JULIA AMARAL

Address PO Box 1450, Nevada City, CA ZIP 95959

Phone 530-277-4640 or 263-1992

Email Address MBSTR8@saber.net

Sup 766-1

SUPPORT CARD 766: MARK STRATE

Response to Sup 766-1

Please see Master Response 1.

Support Card 767

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 767-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Julia AMARAL + MARK STRATE

Address PO Box 1450, Nevada City ZIP 95959

Phone 530-274-1040

Email Address

SUPPORT CARD 767: MARK STRATE

Response to Sup 767-1

Please see Master Response 1.

Support Card 768

Sup 768-1

I support re-opening the Idaho-Maryland Mine.

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Julia Amaral & Mark Strate
P.O. Box 1450
Nevada City, CA 95959

Name(s) _____

Address _____ ZIP _____

Phone 530-274-1040

Email Address jRAMARAL44@gmail.com

SUPPORT CARD 768: MARK STRATE

Response to Sup 768-1

Please see Master Response 1.

Support Card 769

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 769-1

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Name(s) Mark Kubich

Address 10932 Mountaineer Trail ZIP 95945

Phone (530) 272-3276

Email Address

SUPPORT CARD 769: MARK KUBICH

Response to Sup 769-1

Please see Master Response 1.

Support Card 770

I support re-opening the Idaho-Maryland Mine

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Sup 770-1

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Name(s) MARLIN HOUSER

Address 10389 LIME KILN RD, G.V. ZIP 95949

Phone 530 575-8880

Email Address HOUSERGEN @ GMAIL.COM

SUPPORT CARD 770: MARLIN HOUSER

Response to Sup 770-1

Please see Master Response 1.

Support Card 771

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 771-1

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Name(s) Marlyn and Rick Stark

Address 13666 Forest Park Cir ZIP 95946

Phone Penn Valley, CA

~~Email Address~~ 530-513-0562

SUPPORT CARD 771: MARLYN AND RICK STARK

Response to Sup 771-1

Please see Master Response 1.

Support Card 772

Sup 772-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Marti Mc Bride

Address 431 Green St ZIP 95959

Phone 530-265-8778

Email Address

SUPPORT CARD 772: MARTI MCBRIDE

Response to Sup 772-1

Please see Master Response 1.

Support Card 773

I support re-opening the Idaho-Maryland Mine

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Sup 773-1

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Name(s) Martin Harvey

Address 13680 Forest Park Circle ZIP 95946

Phone 530.205 9148

Email Address Martinharvey LWV@comcast.net

SUPPORT CARD 773: MARTIN HARVEY

Response to Sup 773-1

Please see Master Response 1.

Support Card 774

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 774-1

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Name(s) Marvin L. Rockey

Address 437 Sacramento St. Nevada City ZIP 95959

Phone 530 559 0814

Email Address mrack41@gmail.com

SUPPORT CARD 774: MARVIN L. RACKLEY

Response to Sup 774-1

Please see Master Response 1.

Support Card 775

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 775-1

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Name(s) Marvir Cook

Address 10945 Whitehorse Rd Truckee CA ZIP 96161

Phone 267 402 7277

Email Address Marvir.Cook@gMail.Com

SUPPORT CARD 775: MARVIR COOK

Response to Sup 775-1

Please see Master Response 1.

Support Card 776

Sup 776-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mary; Scott Pringle

Address 13055 Robles Dr Auburn ZIP 95602

Phone 5302693055

Email Address scott@scottpringle.net

SUPPORT CARD 776: MARY AND SCOTT PRINGLE

Response to Sup 776-1

Please see Master Response 1.

Support Card 777

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 777-1

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Name(s) Mary Belcourt

Address 10944 SHADY BROOK DR ZIP 95949

Phone 530-268-0554

Email Address

SUPPORT CARD 777: MARY BELESUT

Response to Sup 777-1

Please see Master Response 1.

Support Card 778

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Maryalyce Hansen

Address 2451 Ridge Road GV ZIP 95945

Phone 530-273-8559

Email Address

Sup 778-1

SUPPORT CARD 778: MARYALYCE HANSEN

Response to Sup 778-1

Please see Master Response 1.

Support Card 779

I support re-opening the Idaho-Maryland Mine

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Sup 779-1

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Name(s) Maryalyce Hansen

Address 2451 Ridge Road ZIP

Phone Grass Valley CA 95945

Email Address

My family + I contributed owned the Ballou Mine in the 30's

530-273-8559

SUPPORT CARD 779: MARYALYCE HANSEN

Response to Sup 779-1

Please see Master Response 1.

Support Card 780

I support re-opening the Idaho-Maryland Mine

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Sup 780-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MATT + Tammy Bouchard

Address 11212 All's Well Pl Grass Valley CA ZIP 95945

Phone 530 575 7702

Email Address lastjedi1@hotmail.com

SUPPORT CARD 780: MATT AND TAMMY BOUCHARD

Response to Sup 780-1

Please see Master Response 1.

Support Card 781

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 781-1

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Name(s) Matt Quentmeyer

Address 19088 Scotts Flat Rd, NC ZIP 95959

Phone 530 274 7714

Email Address

SUPPORT CARD 781: MATT QUENTMEYER

Response to Sup 781-1

Please see Master Response 1.

Support Card 782

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Matt and Julie Johnson-Caitlin Johnson

Address 18050 Wildflower Drive P.V. ZIP 95946

Phone 530.263.1569

Email Address matnjulie@AOL.com

Sup 782-1

SUPPORT CARD 782: MATT JOHNSON

Response to Sup 782-1

Please see Master Response 1.

Support Card 783

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Matthew A. Boman

Address 17294 Penn Valley R.D P.V. ZIP 95946

Phone 5303886746

Email Address

Sup 783-1

SUPPORT CARD 783: MATTHEW BOMAN

Response to Sup 783-1

Please see Master Response 1.

Support Card 784

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 784-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Matthew A Roman

Address 17294 Penn Valley DR PV CA. ZIP 95946

Phone 530 · 388-6746

Email Address

SUPPORT CARD 784: MATTHEW BOMAN

Response to Sup 784-1

Please see Master Response 1.

Support Card 785

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 785-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Matthew Mitchell

Address 10304 Weber St Grass Valley ZIP 95945

Phone 530 205 8184

Email Address nevadacity530@gmail.com

SUPPORT CARD 785: MATHEW MITCHELL

Response to Sup 785-1

Please see Master Response 1.

Support Card 786

Sup 786-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Julia Teague

Address 21900 Sweetland RD. ZIP 95960

Phone 530 264-6324

Email Address

SUPPORT CARD 786: MELISSA TEAGUE

Response to Sup 786-1

Please see Master Response 1.

Support Card 787

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) MELODY RAGLIN + John Clune

Address 12966 DAISY Blue mine Rd. N.C.

Phone 530 265-5741

Email Address raglinmia@yahoo.com

Sup 787-1

SUPPORT CARD 787: MELODY RAGLIN

Response to Sup 787-1

Please see Master Response 1.

Support Card 788

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 788-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Michael D. Grayson

Address 22020 Meyer Ravine Rd ZIP 95949

Phone 530-263-2941 Grass Valley CA

Email Address

SUPPORT CARD 788: MICHAEL GLAYSON

Response to Sup 788-1

Please see Master Response 1.

Support Card 789

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 789-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Michael J. Gregersen

Address 24056 Hwy 49 (PO Box 9119) ZIP 95604

Phone —

Email Address None

SUPPORT CARD 789: MICHAEL GREGERSEN

Response to Sup 789-1

Please see Master Response 1.

Support Card 790

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 790-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Michael Hooker

Address _____ ZIP 95949

Phone _____

Email Address mustanghook@yahoo.com

SUPPORT CARD 790: MICHAEL HOOKER

Response to Sup 790-1

Please see Master Response 1.

Support Card 791

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 791-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Michael D. Linn-Kidwell

Address 21119 Pioneer Way, G.V. ZIP 95949

Phone

Email Address mlinnkidwell@gmail.com

SUPPORT CARD 791: MICHAEL LINN-KIDWELL

Response to Sup 791-1

Please see Master Response 1.

Support Card 792

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 792-1

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Name(s) Michael D. Linn-Kidwell

Address 21119 Pioneer Way, Grass Valley ZIP 95949

Phone 916 335-1805

Email Address mlinnkidwell@gmail.com

SUPPORT CARD 792: MICHAEL LINN-KIDWELL

Response to Sup 792-1

Please see Master Response 1.

Support Card 793

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 793-1

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Name(s) Michael Lyman

Address 22120 W Hacienda Dr. ZIP 95949

Phone 435-881-6338 Grass Valley

Email Address mblyman@gmail.com

SUPPORT CARD 793: MICHAEL LYMAN

Response to Sup 793-1

Please see Master Response 1.

Support Card 794

Sup 794-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Michael tyrone McCauley

Address P.O. Box 928 Nevada City CAL ZIP 95959

Phone 419-333-3741

COUNTY JAIL

SUPPORT CARD 794: MICHAEL MCCAULEY

Response to Sup 794-1

Please see Master Response 1.

Support Card 795

I support re-opening the Idaho-Maryland Mine

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Sup 795-1

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Name(s) MICHAEL NORTON

Address 114 PICADILLY LN. GRASS VALLEY, CA. ZIP 95949

Phone

Email Address NORTONCASTLE@GMAIL.COM

SUPPORT CARD 795: MICHAEL NORTON

Response to Sup 795-1

Please see Master Response 1.

Support Card 796

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 796-1

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Name(s) MICHAEL ORTOLA

Address 244 DORSEY DR # 50 ZIP 95945

Phone (530) 210-1143

Email Address _____

SUPPORT CARD 796: MICHAEL ORTOLA

Response to Sup 796-1

Please see Master Response 1.

Support Card 797

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Michael & Sharon Ramirez

Address 13869 & 13871 Highland Dr 95945

Phone 530-205-8473

Email Address Mcram2@outlook.com.

Sup 797-1

SUPPORT CARD 797: MICHAEL AND SHARON RAMIREZ

Response to Sup 797-1

Please see Master Response 1.

Support Card 798

I support re-opening the Idaho-Maryland Mine.

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Sup 798-1

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Name(s) Michael Sabato

Address 841 Old Tunnel Rd. Apt. 2 Grass Valley, CA 95945

Phone (530) 575-7916 Gay Pride

Email Address none

SUPPORT CARD 798: MICHAEL SABATO

Response to Sup 798-1

Please see Master Response 1.

Support Card 799

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 799-1

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Name(s) Michael Vasquez

Address 16631 Indian Flat Rd ZIP 95959

Phone 831-332-8707

Email Address mikey95010@yahoo.com

SUPPORT CARD 799: MICHAEL VASQUEZ

Response to Sup 799-1

Please see Master Response 1.

Support Card 800

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 800-1

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Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address MIKE@HYDRO-WATT.COM

Michael W. Wedel
22792 State Highway 20
Hydro-Watt Inc
Nevada City, CA 95959

SUPPORT CARD 800: MICHAEL W. WEDEL

Response to Sup 800-1

Please see Master Response 1.

Support Card 801

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Michael & Anne Williams

Address PO Box 353 ZIP 95712

Phone Chicago Park CA

Email Address

Sup 801-1

SUPPORT CARD 801: MICHAEL AND ANNE WILLIAMS

Response to Sup 801-1

Please see Master Response 1.

Support Card 802

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 802-1

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Name(s) Ben Kaplan, Asa Kaplan, Michelle Jackson

Address 14365 Sugardust ln ZIP 95949

Phone (916)-742-7062

Email Address Bkaplan8227@yahoo.com

SUPPORT CARD 802: MICHELLE JACKSON

Response to Sup 802-1

Please see Master Response 1.

Support Card 803

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 803-1

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Name(s) Michelle LaValley

Address 16334 Pasquale ZIP 95959

Phone 707 382-5006

Email Address hvmichelly3296@Gmail

SUPPORT CARD 803: MICHELLE LAVALLES

Response to Sup 803-1

Please see Master Response 1.

Support Card 804

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 804-1

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Name(s) Michelle Wooster

Address 19400 Buck Ridge Rd ZIP 95949

Phone

Email Address

SUPPORT CARD 804: MICHELLE WOOSTER

Response to Sup 804-1

Please see Master Response 1.

Support Card 805

I support re-opening the Idaho-Maryland Mine

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Name(s) Mike + Nancy Leslie

Address 14323 Penn Rd ZIP 95949

Phone 530 - 477-5898

Email Address rexford@sbcglobal.net

Sup 805-1

SUPPORT CARD 805: MIKE AND NANCY LESLIE

Response to Sup 805-1

Please see Master Response 1.

Support Card 806

I support re-opening the Idaho-Maryland Mine

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Sup 806-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mike + Nancy Leslie

Address 14353 Penn Rd. Grass Valley ZIP 95949

Phone 530-477-5898

Email Address [illegible]

SUPPORT CARD 806: MIKE AND NANCY LESLIE

Response to Sup 806-1

Please see Master Response 1.

Support Card 807

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 807-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MIKE AND PAM NELLER

Address 22300 Knolls Dr. Grass Valley CA ZIP 95949

Phone (530) 268-2487

Email Address MNeller11@HotMail.com

SUPPORT CARD 807: MIKE AND PAM NEUER

Response to Sup 807-1

Please see Master Response 1.

Support Card 808

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 808-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mike Pemberton and Sandra Collins

Address 13150 Ooti' Ct. Grass Valley ZIP 95949

Phone 530-913-8489

Email Address MikenSandi@Peoplepc.com

SUPPORT CARD 808: MIKE PEMBERTON

Response to Sup 808-1

Please see Master Response 1.

Support Card 809

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 809-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MIKE PEMBERTON & SANDRA COLLINS

Address 13150 COTI CRT, GV ZIP 95949

Phone 530-913-8489

Email Address MIKENSANDI@PEOPLEPC.COM

SUPPORT CARD 809: MIKE PEMBERTON

Response to Sup 809-1

Please see Master Response 1.

Support Card 810

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 810-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MIKE + MARY PETERSON

Address 1969 LEGACY LANE, NEVADA CITY ZIP 95959

Phone (530) 265-3354

Email Address mpeterson@jps.NET NEVADA CO

OUR FAMILY has MANY GENERATIONS of MINING SIERRA CO

SUPPORT CARD 810: MIKE AND MARY PETERSON

Response to Sup 810-1

Please see Master Response 1.

Support Card 811

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 811-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mike + Denise Wood

Address 15868 Duggans Rd Grass Valley CA 95949

Phone (530) 268-8206

Email Address deniseellicottwood@gmail.com

SUPPORT CARD 811: MIKE AND DENISE WOOD

Response to Sup 811-1

Please see Master Response 1.

Support Card 812

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) LINDI ANDERSON - MIKE GRIFFITH

Address 11812 POLARIS DR GV ZIP 95949

Phone 530 798 6169

Email Address LINDI69ANDERSON@YAHOO.COM

Sup 812-1

SUPPORT CARD 812: MIKE GRIFFITH

Response to Sup 812-1

Please see Master Response 1.

Support Card 813

Sup 813-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mitchell R. Coffee

Address 155 West Olympia Dr. ZIP 95945

Phone 530-273-1453

Email Address

SUPPORT CARD 813: MITCHELL R. COFFEE

Response to Sup 813-1

Please see Master Response 1.

Support Card 814

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 814-1

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Name(s) Mitchell R. Coffee

Address 155 West Olympia Drive ZIP 95945

Phone 530-273-1453

Email Address

SUPPORT CARD 814: MITCHELL R. COFFEE

Response to Sup 814-1

Please see Master Response 1.

Support Card 815

Sup 815-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Mitchell T Pendo

Address 17314 Indian Springs Rd ZIP 95946

Phone 530 432-1309

Email Address Interested in Buying Stock in comp send me Info

SUPPORT CARD 815: MITCHELL T. PENDO

Response to Sup 815-1

Please see Master Response 1.

Support Card 816

Sup 816-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Monica Crain

Address 331 Gracie Rd ZIP 95959

Phone # 530-305-0186

Email Address

SUPPORT CARD 816: MONICA CRAIN

Response to Sup 816-1

Please see Master Response 1.

Support Card 817

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 817-1

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Name(s) MORRIS E ANDERSON PENN VALLEY

Address 18273 FAIR OAKS DR ZIP 95946

Phone 530 575-1358

Email Address CAP2000@ATT.NET

SUPPORT CARD 817: MORRIS E. ANDERSON

Response to Sup 817-1

Please see Master Response 1.

Support Card 818

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 818-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Gibbons, Mr.

Address 15106 Fay Rd Grass Valley ZIP 95949

Phone 530-263-2428 Calif

Email Address TooLMANN48@YAHOO.com

SUPPORT CARD 818: MR. GIBBONS

Response to Sup 818-1

Please see Master Response 1.

Support Card 819

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 819-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Myron Putman Mara/ Putman

Address 10186 Elder Dr. G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 819: MYRON AND MARAL PUTMAN

Response to Sup 819-1

Please see Master Response 1.

Support Card 820

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 820-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Myron + Maral Putman

Address 10186 Elder Dr. Grass Valley ZIP 95949

Phone 530 - 273 2996

Email Address

SUPPORT CARD 820: MYRON AND MARAL PUTMAN

Response to Sup 820-1

Please see Master Response 1.

Support Card 821

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 821-1

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Name(s) Myron Putman Maral Putman

Address 10186 Elder Dr. GV ZIP 95949

Phone 530 273-2996

Email Address

SUPPORT CARD 821: MYRON AND MARAL PUTMAN

Response to Sup 821-1

Please see Master Response 1.

Support Card 822

Sup 822-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Nancy Hendrix

Address 144 Lidster Ave GV ZIP 95945

Phone 530 205 9637

Email Address

SUPPORT CARD 822: NANCY HENDRIX

Response to Sup 822-1

Please see Master Response 1.

Support Card 823

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 823-1

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Name(s) Mike + Nancy Leslie

Business Tekton Construction Ph 530-477-5898

Address 14383 Penn Rd. Grass Valley, CA ZIP 95945

Email Address tekton1@sbcglobal.net

SUPPORT CARD 823: NANCY LESLIE

Response to Sup 823-1

Please see Master Response 1.

Support Card 824

Sup 824-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Nanette Kalman

Address 126 W. Berryhill Dr. #306 G.V. CA. ZIP 95945

Phone

Email Address Stormytoo2011@gmail.com

SUPPORT CARD 824: NANETTE KALMAN

Response to Sup 824-1

Please see Master Response 1.

Support Card 825

Sup 825-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Nathan Glowniak

Address 22622 cottage Hill Dr. Grass Valley ZIP 95949

Phone (650) 302-6583

Email Address glowniak.nathan@gmail.com

SUPPORT CARD 825: NATHAN GLOWNIAK

Response to Sup 825-1

Please see Master Response 1.

Support Card 826

Sup 826-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) NATHAN HOOKER, TRISTA HENCLEY

Address 158 WEST OLYMPIA DR ZIP 95945

Phone 530-575-6685

Email Address fordracing66@hotmail.com

SUPPORT CARD 826: NATHAN HOOKER

Response to Sup 826-1

Please see Master Response 1.

Support Card 827

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 827-1

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Name(s) TRISTA HEWLEY / NATHAN HOOKER

Address 158 WEST OLYMPIA DRIVE GRASS VALLEY ZIP 95945

Phone 530-440-3876

Email Address tristah1988@gmail.com

SUPPORT CARD 827: NATHAN HOOKER

Response to Sup 827-1

Please see Master Response 1.

Support Card 828

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 828-1

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Name(s) NEIL BOLTON

Address 13023 GOLDEN TROUT WAY ZIP 95946

Phone

Email Address neilbolton26@gmail.com

SUPPORT CARD 828: NEIL BOLTON

Response to Sup 828-1

Please see Master Response 1.

Support Card 829

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 829-1

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Name(s) Netha L. Hill

Address 14338 State Hwy. 49 ZIP 95949

Phone 530-272-2363

Email Address —

SUPPORT CARD 829: NETHA L. HILL

Response to Sup 829-1

Please see Master Response 1.

Support Card 830

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 830-1

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Name(s) Nicholas Breeze

Address 13036 Ridge Rd. ZIP 95945

Phone 530-263-6436

Email Address nbreeze3@gmail.com

SUPPORT CARD 830: NICHOLAS BREEZE

Response to Sup 830-1

Please see Master Response 1.

Support Card 831

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 831-1

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Name(s) Nicholas & Alyssa Fitting, Justin Krusi

Address 12936 Banner Lava cap Road ZIP 95959

Phone 530-913-2271

Email Address Fittingdesigns@Gmail.com, Fittingdesignsco@Gmail.com

SUPPORT CARD 831: NICHOLAS AND ALYSSA FITTING

Response to Sup 831-1

Please see Master Response 1.

Support Card 832

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 832-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) NICHOLAS August PELLO SR

Address 16460 Trails end Rd ZIP 95959

Phone 530-292-4292

Email Address

SUPPORT CARD 832: NICHOLAS PELLO JR.

Response to Sup 832-1

Please see Master Response 1.

Support Card 833

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 833-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Nicholas + Catherine Whitteseq

Business NA Ph

Address 10665 Cedar Way Grass Valley, CA ZIP 95945

Email Address Cathywhitteseq@hotmail.com

SUPPORT CARD 833: NICHOLAS AND CATHERINE WHITTLESEY

Response to Sup 833-1

Please see Master Response 1.

Support Card 834

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 834-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Nick PeLLo JR

Address 16460 Trails end Rd ZIP 95959

Phone 530-292-4292

Email Address

SUPPORT CARD 834: NICK PELLO JR.

Response to Sup 834-1

Please see Master Response 1.

Support Card 835

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 835-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Norma Brich

Address 12647 Colfax Hwy ZIP 95945

Phone

Email Address

SUPPORT CARD 835: NORMA BUICH

Response to Sup 835-1

Please see Master Response 1.

Support Card 836

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 836-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Norman B. Wilson

Address 661 Chief Kelly Pr. ZIP 95959

Phone

Email Address bignorm1849@comcast.net

SUPPORT CARD 836: NORMAN NIELSON

Response to Sup 836-1

Please see Master Response 1.

Support Card 837

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 837-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Norm Nielsen

Address 661 Chief Kelly Drive ZIP 95959

Phone Nevada City CA.

Email Address

SUPPORT CARD 837: NORM NIELSON

Response to Sup 837-1

Please see Master Response 1.

Support Card 838

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 838-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Norman + Sarah Winn

Address 11266 Sierra Cir ZIP 95946

Phone (530) 913-6623

Email Address winn.norman@yahoo.com

SUPPORT CARD 838: NORMAN AND SARAH WINN

Response to Sup 838-1

Please see Master Response 1.

Support Card 839

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Orta Eckel / Son Walter Eckel

Address 360 Sutton Way #27 GV, Ca ZIP 95945

Phone 1-530-274-1630

Email Address Ø

Sup 839-1

SUPPORT CARD 839: ORTA AND WALTER ECKEL

Response to Sup 839-1

Please see Master Response 1.

Support Card 840

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 840-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ORTA M. Eckel // Son Walter P. Eckel

Address 360 Sutton Way 27 Grass Valley, CA ZIP 95945-4128

Phone 530-274-1630

Email Address

SUPPORT CARD 840: ORTA AND WALTER ECKEL

Response to Sup 840-1

Please see Master Response 1.

Support Card 841

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 841-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Otto W Fischer

Address 14083 Mandolin Way ZIP 95959

Phone 530-575-8535

Email Address OTTFSCHR1234@AOL.com

SUPPORT CARD 841: OTTO FISCHER

Response to Sup 841-1

Please see Master Response 1.

Support Card 842

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 842-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Otto W. Fischer.

Address 14083 Mandolin Way ZIP 95959.

Phone 530. 575-8535

Email Address ~~OFFISCH2~~ 1234@aol.com
OTTFSCHR

SUPPORT CARD 842: OTTO FISCHER

Response to Sup 842-1

Please see Master Response 1.

Support Card 843

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 843-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) D. W. FISCHER

Address 14083 MANDOLIN WAY N. C. ZIP 95959

Phone 530-575-8555

Email Address OTTFSCHR1234@AOL.COM

SUPPORT CARD 843: O. W. FISCHER

Response to Sup 843-1

Please see Master Response 1.

Support Card 844

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 844-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) OVERTON H. CAPERTON

Address 942 FREEMAN LN ZIP 95949

Phone [redacted]

Email Address OVERTONC1950@COMCAST.NET

SUPPORT CARD 844: OVERTON CAPERTON

Response to Sup 844-1

Please see Master Response 1.

Support Card 845

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 845-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ryle

Address 17506 Blue tent school Rd. ZIP 95959

Phone (530) 478-1224

Email Address

SUPPORT CARD 845: P. PYLE

Response to Sup 845-1

Please see Master Response 1.

Support Card 846

Sup 846-1

I support re-opening the Idaho-Maryland Mine

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Name(s) P.N. Prichard

Address 12450 Comet Ln., Grass Valley ZIP 95945

Phone

Email Address

SUPPORT CARD 846: P. N. PRICHARD

Response to Sup 846-1

Please see Master Response 1.

Support Card 847

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 847-1

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Name(s) PAM & DOUG WHITE

Address 10290 PITTSBURG RD. NC ZIP 95959

Phone 273-8756

Email Address

SUPPORT CARD 847: PAM AND DOUG WHITE

Response to Sup 847-1

Please see Master Response 1.

Support Card 848

Sup 848-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Pamela Quellette

Address 340 pleasant st. ZIP 95945

Phone ~

Email Address /

SUPPORT CARD 848: PAMELA DALLUCKI

Response to Sup 848-1

Please see Master Response 1.

Support Card 849

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 849-1

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Name(s) Pamela Dobbas / Kevin Heinisch

Address 23775 Hogan Rd. Auburn ZIP 95602

Phone (530) 268-4720

Email Address dobbassw@hotmail.com

SUPPORT CARD 849: PAMELA DOBBAS

Response to Sup 849-1

Please see Master Response 1.

Support Card 850

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 850-1

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Name(s) Pamela Hayden

Address 106 Lidstone Ave ZIP 95945

Phone

Email Address

SUPPORT CARD 850: PAMELA HAYSEN

Response to Sup 850-1

Please see Master Response 1.

Support Card 851

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 851-1

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Name(s) Pamela Lynette Pemberton

Address 16460 Queen Lil Place ZIP 95959

Phone 530-798-8677

Email Address ppemberton@HOTO.org

SUPPORT CARD 851: PAMELA PEMBERTON

Response to Sup 851-1

Please see Master Response 1.

Support Card 852

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 852-1

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Name(s) Pamela Ryan

Address 10090 Braemar Way Grass Valley CA ZIP 95949

Phone 530 272 0392

Email Address pambeck@suddenlink.net

SUPPORT CARD 852: PAMELA RYAN

Response to Sup 852-1

Please see Master Response 1.

Support Card 853

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 853-1

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Name(s) Pamela Mordy

Address 775 Old Tunnel Rd #104 ZIP 95945

Phone 530-722-7257 Grass Valley, Ca

Email Address

SUPPORT CARD 853: PAMELA MARDY

Response to Sup 853-1

Please see Master Response 1.

Support Card 854

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 854-1

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Name(s) PAT & NITA BROWNING

Address 21766 PLEASANT VLY RD, NO. SAN JUAN ZIP 95960

Phone 530-272-8912

Email Address

SUPPORT CARD 854: PAT AND NITA BROWNING

Response to Sup 854-1

Please see Master Response 1.

Support Card 855

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 855-1

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Name(s) Pat Davis

Address 343 N. Church St ZIP 95945

~~Phone~~ Grass Valley, Ca.

Email Address

SUPPORT CARD 855: PAT DAVIS

Response to Sup 855-1

Please see Master Response 1.

Support Card 856

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 856-1

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Name(s) Pat Nelson

Address PO Box 547, Grass Valley, CA ZIP 95945

Phone 415-847-0862

Email Address plnelsonco@gmail.com

SUPPORT CARD 856: PAT NELSON

Response to Sup 856-1

Please see Master Response 1.

Support Card 857

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 857-1

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Name(s) Pat Sutherland

Address _____ ZIP _____

Phone 530 210 6101

Email Address _____

SUPPORT CARD 857: PAT SUTHERLAND

Response to Sup 857-1

Please see Master Response 1.

Support Card 858

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 858-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Pati J. Costa

Address 21354 Oxnard Ct., Grass Valley ZIP 95949

Phone 346-6461

Email Address NA

SUPPORT CARD 858: PATI COSTA

Response to Sup 858-1

Please see Master Response 1.

Support Card 859

Sup 859-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Patricia A. Anderson

Address 10143 Stone Arch Dr. ZIP Grass Valley, CA 95949

Phone

Email Address g/tdlva@att.net

SUPPORT CARD 859: PATRICIA A. ANDERSON

Response to Sup 859-1

Please see Master Response 1.

Support Card 860

Sup 860-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Patricia Davis

Address 343 N. Church St ZIP 95945

~~Phone~~ Grass Valley Ca

~~Email Address~~ 530-913-1105

SUPPORT CARD 860: PATRICIA DAVIS

Response to Sup 860-1

Please see Master Response 1.

Support Card 861

Sup 861-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patricia L Nattrass

Address 11850 Wolf Rd ZIP

Phone

Email Address nattrass1@att.net

SUPPORT CARD 861: PATRICIA NATTRASS

Response to Sup 861-1

Please see Master Response 1.

Support Card 862

Sup 862-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patrick Harding

Address 10282 N. Auburn St. GRC ZIP 95945

Phone (530) 263-7310

Email Address pat@hcbinc.com

SUPPORT CARD 862: PATRICK HARDING

Response to Sup 862-1

Please see Master Response 1.

Support Card 863

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 863-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patrick Houser

Address 10042 Wolf Rd Suite B ZIP 95949

Phone 530-268-8866

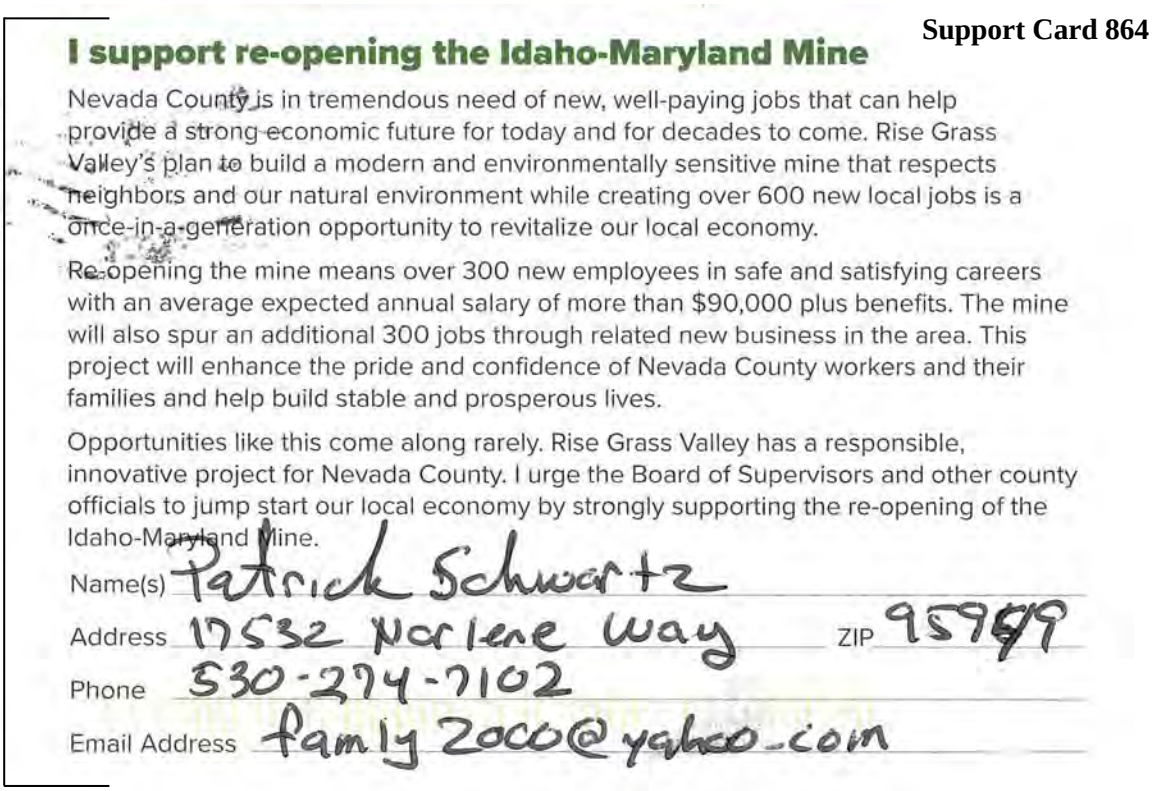
Email Address Pat.RGS@sbcglobal.net

SUPPORT CARD 863: PATRICK HAUSER

Response to Sup 863-1

Please see Master Response 1.

Support Card 864



I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patrick Schwartz

Address 17532 Marlene Way ZIP 95949

Phone 530-274-7102

Email Address family2000@yahoo.com

Sup 864-1

SUPPORT CARD 864: PATRICK SCHWARTZ

Response to Sup 864-1

Please see Master Response 1.

Support Card 865

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 865-1

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Name(s) Patrick Schwartz

Address 17532 Nicklene Way ZIP 95949

Phone 530-274-7102

Email Address famly2000@yahoo.com

SUPPORT CARD 865: PATRICK SCHWARTZ

Response to Sup 865-1

Please see Master Response 1.

Support Card 866

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 866-1

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Name(s) Patrick Sutherland

Address 10556 Combie Rd Auburn Ca ZIP 95602

Phone 530 210 0101

Email Address Patrick.Sutherland@att.net

SUPPORT CARD 866: PATRICK SUTHERLAND

Response to Sup 866-1

Please see Master Response 1.

Support Card 867

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 867-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patsy Boman

Address P.O.Box 4 Smartville CA ZIP 95977

Phone 5303015948

Email Address

SUPPORT CARD 867: PATSY BOMAN

Response to Sup 867-1

Please see Master Response 1.

Support Card 868

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Patti M. Chaet

Address P.O. Box 85 G.V. ZIP 95945

Phone 530 320-9149

Email Address N/A

Sup 868-1

SUPPORT CARD 868: PATTI MICHAEL

Response to Sup 868-1

Please see Master Response 1.

Support Card 869

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 869-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Patti Unger

Address 12123 Snowbourne DR ZIP 95959

Phone _____

Email Address _____

SUPPORT CARD 869: PATTI UNGER

Response to Sup 869-1

Please see Master Response 1.

Support Card 870

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 870-1

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Name(s) PAUL HOLLENBECK

Address P.O. BOX 573 CEDAR RIDGE ZIP 95924

Phone 530-272-5107

Email Address paul_hollenbeck@sbcglobal.net

SUPPORT CARD 870: PAUL HOLLENBECK

Response to Sup 870-1

Please see Master Response 1.

Support Card 871

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 871-1

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Name(s) Paul + Susie McClain

Address 15206 Wolf Ridge Ct. GV ZIP 95949

Phone 916-261-8567

Email Address Paul@4cdike.com

SUPPORT CARD 871: PAUL AND SUSIE MCLAIN

Response to Sup 871-1

Please see Master Response 1.

Support Card 872

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 872-1

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Name(s) Paul McElroy

Address P.O. Box 254 Cedar Ridge ZIP 95924

Phone 530-913-7485

Email Address

SUPPORT CARD 872: PAUL MCELROY

Response to Sup 872-1

Please see Master Response 1.

Support Card 873

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 873-1

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Name(s) PAUL MOSHER

Address PO BOX 1373, NEVADA CITY CA ZIP 95959

Phone (530) 265-9682

Email Address PAUL7600CS@YAHOO.COM

SUPPORT CARD 873: PAUL MOSHER

Response to Sup 873-1

Please see Master Response 1.

Support Card 874

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Paul & Sherrie Rankin

Address 10191 Grant Ct Grass Valley ZIP 95949

Phone 530-913-8946

Email Address sherrankin@gmail.com

Sup 874-1

SUPPORT CARD 874: PAUL AND SHERRIE RANKIN

Response to Sup 874-1

Please see Master Response 1.

Support Card 875

I support re-opening the Idaho-Maryland Mine

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Name(s) Paul R Silva

Address 614 Kate Hayes St, GV. ZIP 95945

Phone

Email Address

Sup 875-1

SUPPORT CARD 875: PAUL SILVA

Response to Sup 875-1

Please see Master Response 1.

Support Card 876

I support re-opening the Idaho-Maryland Mine

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Sup 876-1

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Name(s) Paul Speers

Address 11785 Lakeshore N Auburn ZIP 95602

Phone 916-769-0008

Email Address pbsspeers@icloud.com

SUPPORT CARD 876: PAUL SPEERS

Response to Sup 876-1

Please see Master Response 1.

Support Card 877

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 877-1

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Name(s) PAUL WILSON

Address 18202 SEQUA WAY ZIP 95949

Phone GRASS VALLEY CA

Email Address PAULSSWILSON@YAHOO.COM

SUPPORT CARD 877: PAUL WILSON

Response to Sup 877-1

Please see Master Response 1.

Support Card 878

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 878-1

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Name(s) Paul Daniel Jordan

Address 12219 Rough and Ready Hwy Grass Valley ZIP 95945

Phone 424 376 9522

Email Address juiceforlife@live.com

SUPPORT CARD 878: PAUL JORDAN

Response to Sup 878-1

Please see Master Response 1.

Support Card 879

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 879-1

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Name(s) Paul PeKarek

Address 19 Wendy Cir ZIP

Phone (530) 272-2217 / Cell - 530-913-7736

Email Address Cindygoldminer @ Yahoo . Com

SUPPORT CARD 879: PAUL PEKAREK

Response to Sup 879-1

Please see Master Response 1.

Support Card 880

Sup 880-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Paul Thayer

Address 441 Mill St G.V. CA 95945 ZIP

Phone 530 559-8568

Email Address

SUPPORT CARD 880: PAUL THAYER

Response to Sup 880-1

Please see Master Response 1.

Support Card 881

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 881-1

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Name(s) Paula Lewis

Address 15988 Thiel Way, Grass Valley ZIP 95949

Phone (530) 205-8526

Email Address PLNARSIEP08A@GMAIL.COM

SUPPORT CARD 881: PAULA LEWIS

Response to Sup 881-1

Please see Master Response 1.

Support Card 882

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 882-1

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Name(s) Pearce BOYER

Address 11416 Timothy Way ZIP 95949

Phone

Email Address pearceboyer@gmail.com

SUPPORT CARD 882: PEARCE BOYER

Response to Sup 882-1

Please see Master Response 1.

Support Card 883

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 883-1

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Name(s) Pedro and Christina Perez

Address 126 Lidster Ave. ZIP 95945

Phone (530) 477-1011

Email Address pperezdh60@gmail.com

SUPPORT CARD 883: PEDRO AND CHRISTINA PEREZ

Response to Sup 883-1

Please see Master Response 1.

Support Card 884

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 884-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Peggy & Jim Griffin

Address 18900 Chickadee Ct ZIP Penn Valley, CA 95946

Phone

Email Address

SUPPORT CARD 884: PEGGY AND JIM GRIFFIN

Response to Sup 884-1

Please see Master Response 1.

Support Card 885

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 885-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Percy Dutrieux

Address 10131 Shamrock Lodge ZIP 95949

Phone 530-263-4228

Email Address RSAPR2803@Outlook.com.

SUPPORT CARD 885: PERCY DUTRIEUX

Response to Sup 885-1

Please see Master Response 1.

Support Card 886

Sup 886-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Terris Hak

Address 11403 Woodcore Ct ZIP 95949

Phone 530-575-1201

Email Address

SUPPORT CARD 886: PERRIS HALE

Response to Sup 886-1

Please see Master Response 1.

Support Card 887

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 887-1

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Name(s) PETE CHRISTENSEN

Address 309 VISTAMONT - GRASS VALLEY ZIP 95945

Phone 530-906-5209

Email Address PETECHRISTENSEN@SBCGLOBAL.NET

SUPPORT CARD 887: PETE CHRISTENSEN

Response to Sup 887-1

Please see Master Response 1.

Support Card 888

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 888-1

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Name(s) PETE MEDRANO

Address P.O. Box 972 Grass Valley CA ZIP 95945

Phone 530 - 277 - 8606

Email Address elktacomedrano@yahoo.com

SUPPORT CARD 888: PETE MEDRANO

Response to Sup 888-1

Please see Master Response 1.

Support Card 889

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 889-1

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Name(s) PETE CHRISTENSEN

Address 309 VISTAMONT DRIVE ZIP 95945

Phone 530-906-5209

Email Address pete.christensen@SBCGLOBAL.NET

SUPPORT CARD 889: PETE CHRISTENSEN

Response to Sup 889-1

Please see Master Response 1.

Support Card 890

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 890-1

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Name(s) PETER AND CLARE COUSOULIS

Address 11642 REDWING CT. ZIP 95946

Phone 925 305 1455

Email Address

SUPPORT CARD 890: PETER AND CLARE COUSSOULIS

Response to Sup 890-1

Please see Master Response 1.

Support Card 891

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) PETER AND CLARE COUSOULIS

Address 11642 REDWING CT. ZIP 95946

Phone 925 305 1455

Email Address

Sup 891-1

SUPPORT CARD 891: PETER AND CLARE COUSSOULIS

Response to Sup 891-1

Please see Master Response 1.

Support Card 892

Sup 892-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Peter G. Falk

Address 17791 Hitch Ct. ZIP

Phone

Email Address Penn Valley , CA 95946

SUPPORT CARD 892: PETER FALK

Response to Sup 892-1

Please see Master Response 1.

Support Card 893

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 893-1

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Name(s) Mr. Peter Gruber

Address 18369 Siesta Dr. ZIP

Penn Valley, CA 95946-8916

Phone (530) 263-0077

Email Address Pgruber628@gmail.com

SUPPORT CARD 893: PETER GRUBER

Response to Sup 893-1

Please see Master Response 1.

Support Card 894

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 894-1

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Mr. Peter Gruber
18369 Siesta Dr.
Penn Valley, CA 95946-8916

Name(s) _____

Address _____ ZIP _____

Phone (530) 263-0077

Email Address Pgruber628@gmail.com

SUPPORT CARD 894: PETER GRUBER

Response to Sup 894-1

Please see Master Response 1.

Support Card 895

Sup 895-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Peter W. Snyder

Address 116 Starling Cir.

ZIP Grass Valley, CA 95945

Phone 925-895-8276

Email Address

SUPPORT CARD 895: PETER SNYDER

Response to Sup 895-1

Please see Master Response 1.

Support Card 896

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) PETRA JOVINALL

Address 12376 VALLEY VIEW Rd ZIP 95959

Phone 530-273-2155

Email Address LITTLEROCK710@YAHOO.COM

Sup 896-1

SUPPORT CARD 896: PETRA JUVINALL

Response to Sup 896-1

Please see Master Response 1.

Support Card 897

Sup 897-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Phil Zink

Address 11420 Tower Hill Rd. ZIP 95959
Nevada City, CA

Phone 530-446-5794

Email Address

SUPPORT CARD 897: PHIL ZINK

Response to Sup 897-1

Please see Master Response 1.

Support Card 898

I support re-opening the Idaho-Maryland Mine

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Sup 898-1

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Name(s) Philip D. McCoy

Address 13449 Grand Oaks Pl. ZIP 95949

Grass Valley

Phone

Email Address

SUPPORT CARD 898: PHILIP D. MCCOY

Response to Sup 898-1

Please see Master Response 1.

Support Card 899

I support re-opening the Idaho-Maryland Mine

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Sup 899-1

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Name(s) Philip D. McCoy

Address 13449 Grand Oaks Pl. ZIP 95949

Phone

Email Address philipdmccoy@aol.com

SUPPORT CARD 899: PHILIP D. MCCOY

Response to Sup 899-1

Please see Master Response 1.

Support Card 900

Sup 900-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Phillip Milam

Address 405 Marshall St. #2B ZIP 95945

Phone NA Grass Valley, Ca.

Email Address phillipmilam4@gmail.com

SUPPORT CARD 900: PHILLIP MILAM

Response to Sup 900-1

Please see Master Response 1.

Support Card 901

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 901-1

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Name(s) PHILLIP PARKER

Address 10832 GREY GOOSE LN PENN VALLEY ZIP 95946

Phone 432-1083

Email Address

SUPPORT CARD 901: PHILLIP PARKER

Response to Sup 901-1

Please see Master Response 1.

Support Card 902

Sup 902-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Priscilla Vanderpas

Address _____ ZIP _____

Phone 272-5154

Email Address _____

SUPPORT CARD 902: PRISCILLA VANDERPAS

Response to Sup 902-1

Please see Master Response 1.

Support Card 903

Sup 903-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Quentin Browne

Address 578 Sutton Way #366 ZIP 95945

Phone

Email Address qjbrowne79@gmail.com

SUPPORT CARD 903: QUENTIN BROWNE

Response to Sup 903-1

Please see Master Response 1.

Support Card 904

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 904-1

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Name(s) Rachael & Brad Harvey

Address 10372 QUINCY LANE ZIP 95946
PENN VALLEY, CA 95946

Phone 530-401-9618

Email Address luvhorses26@gmail.com

SUPPORT CARD 904: RACHEL AND BRAD HARVEY

Response to Sup 904-1

Please see Master Response 1.

Support Card 905

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 905-1

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Name(s) Rachel Weston

Address 14628 Meadow Dr GVCA ZIP 95945

Phone 530-845-2337

Email Address jediprincess@frontiernet.net

SUPPORT CARD 905: RACHEL WESTON

Response to Sup 905-1

Please see Master Response 1.

Support Card 906

Sup 906-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ralph & Morris

Address P.O. Box 122 Rough + Ready CA ZIP 95975

Phone 530-559-5632

Email Address None

SUPPORT CARD 906: RALPH A. MORRIS

Response to Sup 906-1

Please see Master Response 1.

Support Card 907

I support re-opening the Idaho-Maryland Mine

JOBS JOBS JOBS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 907-1

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Name(s) Randolph Lanzendorfer

Address PO Box 130 Rough & Ready Ca ZIP 95975

Phone 530-243-6252

Email Address dotslammer@gmail.com

SUPPORT CARD 907: RANDOLPH LANZENDORKER

Response to Sup 907-1

Please see Master Response 1.

Support Card 908

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 908-1

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Name(s) Randy C. & Teri Freeman

Address 12812 Magnolia Road G.V. CA ZIP 95949

Phone

Email Address

SUPPORT CARD 908: RANDY AND TERI FREEMAN

Response to Sup 908-1

Please see Master Response 1.

Support Card 909

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 909-1

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Name(s) Randy Smith

Business _____ Ph _____

Address PO Box 1754 ZIP 95959

Email Address Randy.Smith210@ATT.net

SUPPORT CARD 909: RANDY SMITH

Response to Sup 909-1

Please see Master Response 1.

Support Card 910

Sup 910-1

I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Randy Casto



Karen Casto
11022 Spenceville Rd
Penn Valley, CA 95946

Address _____ ZIP _____

Phone _____

Email Address rcasto.rcalestate@gmail.com

SUPPORT CARD 910: RANDY AND KAREN CASTO

Response to Sup 910-1

Please see Master Response 1.

Support Card 911

Sup 911-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) RANDY NUNNINK

Address 14134 SERPENTINE TRAIL ZIP 95949

Phone 530 320 4096

Email Address RANUNNINK@GMAIL.COM

SUPPORT CARD 911: RANDY NUNNINK

Response to Sup 911-1

Please see Master Response 1.

Support Card 912

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 912-1

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Name(s) Randy Smith

Address PO Box 1754 ZIP 95959

Phone 530 559 5373

Email Address RandySmith-21@ATT.net

SUPPORT CARD 912: RANDY SMITH

Response to Sup 912-1

Please see Master Response 1.

Support Card 913

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) RAYMOND GODNEY

Address 13332 CEMENT HILL RD ZIP 95959

Phone 925 922 0801

Email Address GODNEY777@YAHOO.COM

Sup 913-1

SUPPORT CARD 913: RAYMOND GEDNEY

Response to Sup 913-1

Please see Master Response 1.

Support Card 914

I support re-opening the Idaho-Maryland Mine.

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Sup 914-1

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Name(s) Raymond Knowles

Address 17918 Minnow Way Penn Valley ZIP 95946

Phone 530 432-1548

Email Address RayKo1@comcast.net

SUPPORT CARD 914: RAYMOND KNOWLE

Response to Sup 914-1

Please see Master Response 1.

Support Card 915

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 915-1

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Name(s) Raymond W Shepherd

Address 10530 WALKER DR. SP. 15 ZIP 95945

Phone 530-205-9268

Email Address RAYmond3345(a)att.net

SUPPORT CARD 915: RAYMOND W. SHEPHERD

Response to Sup 915-1

Please see Master Response 1.

Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume IV of IX
(Chapter 2 *Continued*)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Support Card 916

I support re-opening the Idaho-Maryland Mine

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Sup 916-1

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Name(s) REBECCA FRENCH

Address PO BOX 219 WASHINGTON, CA ZIP 95986

Phone 530 470-0493

Email Address rebeccafrench13492@gmail.com

SUPPORT CARD 916: REBECCA FRENCH

Response to Sup 916-1

Please see Master Response 1.

Support Card 917

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 917-1

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Name(s) Reed Newcomb

Address 15443 Shannon Way ZIP 95950

Phone

Email Address cobareed@yahoo.com

SUPPORT CARD 917: REED NEWCOMB

Response to Sup 917-1

Please see Master Response 1.

Support Card 918

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 918-1

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Name(s) Rhett Lewis

Address 19390 Hansen Ln GV ZIP 95945

Phone 530 277 4615

Email Address

SUPPORT CARD 918: RHETT LEWIS

Response to Sup 918-1

Please see Master Response 1.

Support Card 919

I support re-opening the Idaho-Maryland Mine

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Sup 919-1

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Name(s) Ricardo & Linda Fuentes

Address 2036 Nevada City Hwy. #263 ZIP 95945

Phone 209-323-8303

Email Address 6g6g6350@gmail.com

SUPPORT CARD 919: RICARDO AND LINDA FUENTES

Response to Sup 919-1

Please see Master Response 1.

Support Card 920

I support re-opening the Idaho-Maryland Mine.

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Sup 920-1

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Name(s) Rich Fox

Address PO Box 214 ZIP 95959

Phone – NA –

Email Address onefrankfox@gmail.com

SUPPORT CARD 920: RICH FOX

Response to Sup 920-1

Please see Master Response 1.

Support Card 921

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 921-1

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Name(s) RICHARD BUCHER

Address 10112 STONE ARCH DR GV. ZIP 95949

Phone 530 798-8588

Email Address RWBUCHER@HOTMAIL.COM

SUPPORT CARD 921: RICHARD BUCHER

Response to Sup 921-1

Please see Master Response 1.

Support Card 922

Sup 922-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) RICHARD CARTER

Address 800 FREEMAN LN APT 101 ZIP 95949
Grass Valley, CA

Phone (714) 299-0787

Email Address richcarterocal@me.com

SUPPORT CARD 922: RICHARD CARTER

Response to Sup 922-1

Please see Master Response 1.

Support Card 923

I support re-opening the Idaho-Maryland Mine

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Sup 923-1

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Name(s) Richard Cortez & Kathy Palmer

Address 12313 Starwood Ln Nevada City CA ZIP 95959.

Phone 661-505-3487

Email Address rcbiznes@gmail.com

SUPPORT CARD 923: RICHARD CORTEZ

Response to Sup 923-1

Please see Master Response 1.

Support Card 924

I support re-opening the Idaho-Maryland Mine.

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Sup 924-1

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Name(s) RICHARD DEFERDING

Address 11111 LAKESHORE SOUTH ZIP 95602

Phone

Email Address RCDeter@AOL.com

SUPPORT CARD 924: RICHARD DETERDING

Response to Sup 924-1

Please see Master Response 1.

Support Card 925

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 925-1

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Name(s) Richard French

Address 18247 Indian Springs Rd, Penn Valley ZIP 95926

Phone

Email Address

SUPPORT CARD 925: RICHARD FRENCH

Response to Sup 925-1

Please see Master Response 1.

Support Card 926

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 926-1

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Name(s) RICHARD GRAYDON

Address 13595 LIME KILN Rd ZIP 95949

Phone GRASS VALLEY, CA

Email Address

SUPPORT CARD 926: RICHARD GRAYDON

Response to Sup 926-1

Please see Master Response 1.

Support Card 927

Sup 927-1

I support re-opening the Idaho-Maryland Mine

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Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____



SUPPORT CARD 927: RICHARD HANSEN

Response to Sup 927-1

Please see Master Response 1.

Support Card 928

I support re-opening the Idaho-Maryland Mine

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Sup 928-1

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Name(s) RICHARD & HEATHER

Address 10199 RINCON WAY GRASS VALLEY ZIP 95602

Phone N/A

Email Address HEATHER@JUSTCABINETS.COM

SUPPORT CARD 928: RICHARD HEATHER

Response to Sup 928-1

Please see Master Response 1.

Support Card 929

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 929-1

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Name(s) Richard J. Kuhwarth, Sr.

Address 12252 Francis Drive, G.V. ZIP 95949

Phone 530-272-5723

Email Address kuhwarth@AOL.com

SUPPORT CARD 929: RICHARD KUHWARTH

Response to Sup 929-1

Please see Master Response 1.

Support Card 930

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 930-1

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Name(s) Richard Okuma

Address 14729 MacDonald Rd ZIP 95949

Phone 530-268-1257

Email Address

SUPPORT CARD 930: RICHARD KUNA

Response to Sup 930-1

Please see Master Response 1.

Support Card 931

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 931-1

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Name(s) Richard + Lisa Musa

Address 12200 Banner Lava Cap ZIP 95959

Phone 530 273-4746

Email Address musaklan a gmail com

SUPPORT CARD 931: RICHARD AND LISA MUSA

Response to Sup 931-1

Please see Master Response 1.

Support Card 932

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 932-1

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Name(s) Richard Okuma

Address 14329 MacDonald Rd ZIP 95949

Phone 530-268-1257

Email Address RichardOkuma@Gmail.com

SUPPORT CARD 932: RICHARD OKUMA

Response to Sup 932-1

Please see Master Response 1.

Support Card 933

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 933-1

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Name(s) Richard Preece & Laura Preece

Address 11999 Tree Top Cir, Nevada City ZIP 95959

Phone 530-274-7303

Email Address laura-preece@comcast.net

SUPPORT CARD 933: RICHARD AND LAURA PREECE

Response to Sup 933-1

Please see Master Response 1.

Support Card 934

Sup 934-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Richard Rodeck

Address P.O. Box 1379, Nev. City ZIP 95959

Phone 273-7721

Email Address

SUPPORT CARD 934: RICHARD RODECK

Response to Sup 934-1

Please see Master Response 1.

Support Card 935

I support re-opening the Idaho-Maryland Mine

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Sup 935-1

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Name(s) Richard Rodeck

Address P.O. Box 1379, Nevada City ZIP 95959

Phone 530-273-7721

Email Address 1hiker@earthlink.net

SUPPORT CARD 935: RICHARD RODECK

Response to Sup 935-1

Please see Master Response 1.

Support Card 936

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Richard & Velva WASHBURN

Address 13061 St GREGORY PL ZIP 95949

Phone 530-362-1197

Email Address RLCRAPP@GMAIL.COM

Sup 936-1

SUPPORT CARD 936: RICHARD AND VELVA WASHBURN

Response to Sup 936-1

Please see Master Response 1.

Support Card 937

Sup 937-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Richard Davis

Address 17267 Virginia Way GV ZIP 95949

Phone

Email Address richdavis66@gmail.com

SUPPORT CARD 937: RICHARD DAVIS

Response to Sup 937-1

Please see Master Response 1.

Support Card 938

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 938-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) RICHARD TERRELL

Address 12189 WOODACRE RD G.V. ZIP 95949

Phone 530 2775385

Email Address ESPTERRELL50@GMAIL.COM

SUPPORT CARD 938: RICHARD TERRELL

Response to Sup 938-1

Please see Master Response 1.

Support Card 939

I support re-opening the Idaho-Maryland Mine YES!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 939-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) RICK & MARIKA LYNN

Address 11385 MIRROR LAKE COURT ZIP 95945

Phone 530.477.8301(H) 530.368.2272(M)

Email Address RICK.M.LYNN@GMAIL.COM

SUPPORT CARD 939: RICK AND MARIKA LYNN

Response to Sup 939-1

Please see Master Response 1.

Support Card 940

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 940-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JOHN CARTER & RITADINA ARRIAGA

Address 10082 THREE SEVENS PL GRASS VALLEY CA ZIP 95949

Phone 530-477-2269

Email Address docjohn46@yahoo.com

SUPPORT CARD 940: RITADINA ARRIAGA

Response to Sup 940-1

Please see Master Response 1.

Support Card 941

Sup 941-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Rob & Rachel Baldwin

Address 10458 Sierra Drive ZIP 95945

Phone (530) 477-5123

Email Address robbaldwin75@yahoo.com

SUPPORT CARD 941: ROB AND RACHEL BALDWIN

Response to Sup 941-1

Please see Master Response 1.

Support Card 942

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 942-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Rob BEAUM PENN VALLEY

Address 12189 LAKE Wildwood DR. ZIP 95946

Phone 530 913 0566

Email Address -0-

SUPPORT CARD 942: ROB BEAM

Response to Sup 942-1

Please see Master Response 1.

Support Card 943

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) MR AND MRS SABRINA BOSMA

Address 11022 JUANITA CT. GRASS VALLEY CA. ZIP 95949

Phone (530) 205-8034

Email Address TOBANDBALL@YAHOO.COM

Sup 943-1

SUPPORT CARD 943: ROB AND SABREENA BOSMA

Response to Sup 943-1

Please see Master Response 1.

Support Card 944

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 944-1

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Name(s) Rob Curry

Address 16405 Pasadvale Rd. ZIP 95959

Phone 530 648-6532

Email Address Robc8746 at gmail.com

SUPPORT CARD 944: ROB CURRY

Response to Sup 944-1

Please see Master Response 1.

Support Card 945

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 945-1

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Name(s) Rob and Kathy Penn

Address 15347 Banner Lava Cap, NC ZIP 95959

Phone 530-265-8348

Email Address kf4fire@yahoo.com

SUPPORT CARD 945: ROB AND KATHY PENN

Response to Sup 945-1

Please see Master Response 1.

Support Card 946

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 946-1

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Name(s) Rob Ullom

Address P.O. Box 2268 Grass Valley CA ZIP 95945

Phone (530) 277-8846

Email Address N/A

Please send job application

SUPPORT CARD 946: ROB ULLOM

Response to Sup 946-1

Please see Master Response 1.

Support Card 947

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 947-1

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Name(s) ROBERT ASH

Address 13875 MEADOW DR ZIP 95945

Phone 916 496 1514

Email Address robert@ashlawfr.com

SUPPORT CARD 947: ROBERT ASH

Response to Sup 947-1

Please see Master Response 1.

Support Card 948

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 948-1

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Name(s) Robert + Marilyn Chrisman

Business _____ Ph _____

Address 13028 Jones Bar Rd, Nevada City ZIP 95959

Email Address _____

PS: awesome logo!

SUPPORT CARD 948: ROBERT AND MARILYN CHRISMAN

Response to Sup 948-1

Please see Master Response 1.

Support Card 949

Sup 949-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Robert & Laura CROUSE

Address 181 Arcadia Dr ZIP 95945

Phone

Email Address

SUPPORT CARD 949: ROBERT AND LAURA CROUSE

Response to Sup 949-1

Please see Master Response 1.

Support Card 950

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 950-1

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Name(s) Robert W. Foster

Address 509 Holly DR, Grass Valley CA ZIP 95945

Phone (530) 272-8736

Email Address

SUPPORT CARD 950: ROBERT FOSTER

Response to Sup 950-1

Please see Master Response 1.

Support Card 951

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 951-1

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Name(s) Robert W Free Sr.

Address 13801 Thoroughbred Loop ZIP 95949

Phone 916-318-2518

Email Address rwfree@aol.com

SUPPORT CARD 951: ROBERT FREE

Response to Sup 951-1

Please see Master Response 1.

Support Card 952

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 952-1

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Name(s) Robert and Linda Haight

Address 14949 Oak Meadow Rd, Penn Valley ZIP 95946

Phone 530-432-4408

Email Address bobhaight@gmail.com

SUPPORT CARD 952: ROBERT AND LINDA HAIGHT

Response to Sup 952-1

Please see Master Response 1.

Support Card 953

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 953-1

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Name(s) Robert + Lynn Haight

Address 14949 Oak Meadow Rd Penn Valley ZIP 95946

Phone 530-432-4408

Email Address bobhaight@gmail.com

SUPPORT CARD 953: ROBERT AND LYNN HAIGHT

Response to Sup 953-1

Please see Master Response 1.

Support Card 954

I support re-opening the Idaho-Maryland Mine

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Sup 954-1

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Name(s) Sean Minor / Robert Hedrick

Business Auburn Moving & Storage Ph 5308238685

Address 10000 Hill View Rd. Newcastle, CA 95658 ZIP

Email Address info@auburnmoving.com

SUPPORT CARD 954: ROBERT HICKINS

Response to Sup 954-1

Please see Master Response 1.

Support Card 955

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 955-1

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Name(s) Robert & MaryAnn Hudspeth

Address 13781 Auburn Rd, Grass Valley ZIP 95949

Phone

Email Address

SUPPORT CARD 955: ROBERT AND MARYANN HUDSPETH

Response to Sup 955-1

Please see Master Response 1.

Support Card 956

I support re-opening the Idaho-Maryland Mine

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Sup 956-1

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Name(s) ROBERT E. INGRAM

Address 239 HARBOR ST GV. ZIP 95945

Phone (530) 273-7596

Email Address RGINGRAM52@ATT.NET

SUPPORT CARD 956: ROBERT INGRAM

Response to Sup 956-1

Please see Master Response 1.

Support Card 957

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 957-1

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Name(s) Robert + Elaine Johnson

Address 10262 Whitetail Lane ZIP 96161

Phone 530 · 582 · 8229

Email Address

SUPPORT CARD 957: ROBERT AND ELAINE JOHNSON

Response to Sup 957-1

Please see Master Response 1.

Support Card 958

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 958-1

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Name(s) Robert L Kilroy

Address 15318 71 wy 20 N.C. ZIP 95959

Phone 530-913-0324

Email Address

SUPPORT CARD 958: ROBERT KILROY

Response to Sup 958-1

Please see Master Response 1.

Support Card 959

I support re-opening the Idaho-Maryland Mine

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Sup 959-1

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Name(s) Robert Kilroy

Address 15318 Hwy 20 Nevada City, Calif 95959

Phone 530-913-0324

Email Address O

SUPPORT CARD 959: ROBERT KILROY

Response to Sup 959-1

Please see Master Response 1.

Support Card 960

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 960-1

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Name(s) Robert Kilroy

Address 15318 Hwy 20 Nevada City Calif. ZIP 95959

Phone 530 – 913 – 0324

Email Address None

SUPPORT CARD 960: ROBERT KILROY

Response to Sup 960-1

Please see Master Response 1.

Support Card 961

Sup 961-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Robert J. Lang

Address 12041 Lake Wildwood Dr ZIP

Penn Valley, CA 95946-9480

Phone 432-5341

Email Address None

SUPPORT CARD 961: ROBERT LANG

Response to Sup 961-1

Please see Master Response 1.

Support Card 962

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 962-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Lewis

Address 236 Quartz street ZIP 95945

Phone

Email Address lewismailbox520@Gmail.com

SUPPORT CARD 962: ROBERT LEWIS

Response to Sup 962-1

Please see Master Response 1.

Support Card 963

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 963-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Lowenthal

Address 107 Bridger Ct. Grass Valley, CA 95945 ZIP

Phone

Email Address ROLOW@FSACCESS.NET

SUPPORT CARD 963: ROBERT LOWENTHAL

Response to Sup 963-1

Please see Master Response 1.

Support Card 964

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 964-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county offici pening of the Idah

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P-3 P57 217**********ECRWSH**R017
Robert Ray Lowenthal
107 Bridger Ct
Grass Valley, CA 95945-9706

SUPPORT CARD 964: ROBERT LOWENTHAL

Response to Sup 964-1

Please see Master Response 1.

Support Card 965

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ROBERT J. MATSON

Address 360 BENNETT ST. #18 ZIP 95945

Phone GRASS VALLEY, CA.

Email Address

Sup 965-1

SUPPORT CARD 965: ROBERT MATSON

Response to Sup 965-1

Please see Master Response 1.

Support Card 966

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 966-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert M. McGee, Lynn D. McGee

Address P. O. Box 201 ZIP 95986

Phone (530) 386-2435

Email Address mikemcgee257@gmail.com
(all small letters)

SUPPORT CARD 966: ROBERT AND LYNN MCGEE

Response to Sup 966-1

Please see Master Response 1.

Support Card 967

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 967-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Mills

Address 15739 Crystal ct ZIP 95940

Phone 272 5891

Email Address N/A

SUPPORT CARD 967: ROBERT MILLS

Response to Sup 967-1

Please see Master Response 1.

Support Card 968

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 968-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Addr... _____

Robert Mills
15739 Burnette Pl.
Grass Valley, CA 95949-9738

SUPPORT CARD 968: ROBERT MILLS

Response to Sup 968-1

Please see Master Response 1.

Support Card 969

Sup 969-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Mills

Address 15739 Burnette Pl. ZIP Grass Valley, CA 95949

Phone

Email Address

SUPPORT CARD 969: ROBERT MILLS

Response to Sup 969-1

Please see Master Response 1.

Support Card 970

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 970-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Newkirk

Address 10530 Sky Circle, Grass Valley, CA ZIP 95949

Phone 5306322072

Email Address gvk_530@hotmail.com

SUPPORT CARD 970: ROBERT NEWKIRK

Response to Sup 970-1

Please see Master Response 1.

Support Card 971

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 971-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ROBERT W. PARKS

Address P.O. Box 1643 GRASS-VALLY ZIP 95945

Phone (530) 273-4567

Email Address

SUPPORT CARD 971: ROBERT PARKS

Response to Sup 971-1

Please see Master Response 1.

Support Card 972

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 972-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert and Alicia Rist

Address 10367 Owl Rd. GV ZIP 95945

Phone 530-575-7474

Email Address rist_22@yahoo.com

SUPPORT CARD 972: ROBERT AND ALICIA RIST

Response to Sup 972-1

Please see Master Response 1.

Support Card 973

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 973-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ROBERT T SEIDLITZ

Address 10536 COMBIE RD #6506 ZIP 95602

Phone

Email Address BSBULLDOG55@LIVE.COM

SUPPORT CARD 973: ROBERT SEIDLITZ

Response to Sup 973-1

Please see Master Response 1.

Support Card 974

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 974-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.



Name(s) Robert Shrader

Address 17665 Royal Oaks Pl ZIP

Grass Valley, CA 95949

Phone N/A

Email Address N/A

SUPPORT CARD 974: ROBERT SHRADER

Response to Sup 974-1

Please see Master Response 1.

Support Card 975

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 975-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert E Tate

Address 214 Park Av. Nevada City ZIP 95959

Phone 530 955 3179

Email Address BobTatePE@Gmail.COM

SUPPORT CARD 975: ROBERT TOTE

Response to Sup 975-1

Please see Master Response 1.

Support Card 976

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 976-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert H. (Bob) Wilda

Address 14292 WARDENS COURT ZIP 95945

Phone 530 273-2500

Email Address

SUPPORT CARD 976: ROBERT WILDEN

Response to Sup 976-1

Please see Master Response 1.

Support Card 977

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 977-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert + Dixie Wilson

Address 18528 Jayhawk Dr. Penn Valley ZIP 95946

Phone 432-9580

Email Address bobdixie2@comcast.net

SUPPORT CARD 977: ROBERT AND DIXIE WILSON

Response to Sup 977-1

Please see Master Response 1.

Support Card 978

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 978-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mr. & Mrs. Robert Wilson

Address 18528 Skyhawk Dr. Penn Valley ZIP 95946

Phone 530-432-9580

Email Address bobdixie1@comcast.net

SUPPORT CARD 978: ROBERT WILSON

Response to Sup 978-1

Please see Master Response 1.

Support Card 979

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 979-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robert Zoellin

Address 16303 Shady Forest Ln ZIP 95945

Phone 530-368-7568

Email Address zoellinesbcglobal.net

SUPPORT CARD 979: ROBERT ZOELLIN

Response to Sup 979-1

Please see Master Response 1.

Support Card 980

Sup 980-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Robert Birk

Address 10491 Little Hollow Lane ZIP 95949

Phone 530 305-9917

Email Address bandsbirk@MSN.com

SUPPORT CARD 980: ROBERT BIRK

Response to Sup 980-1

Please see Master Response 1.

Support Card 981

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 981-1

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Name(s) ROBERT SPENCER

Address 13344 GRASS VALLEY AVE, #G ZIP 95945

Phone (530) 205-3343

Email Address ROBBI@SESTUDIOS.NET

SUPPORT CARD 981: ROBERT SPENCER

Response to Sup 981-1

Please see Master Response 1.

Support Card 982

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 982-1

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Name(s) ROBIN & JENNY KITTS

Address 135 HUNTINGTON CT ZIP 95945

Phone 916-607-0115

Email Address gvkitts@yahoo.com

SUPPORT CARD 982: ROBIN AND JENNY KITTS

Response to Sup 982-1

Please see Master Response 1.

Support Card 983

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 983-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Robin Kitts

Address 135 Huntington ct ZIP 95945

Phone 916-604-0115

Email Address G.V.Kitts@yahoo.com

SUPPORT CARD 983: ROBIN KITTS

Response to Sup 983-1

Please see Master Response 1.

Support Card 984

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 984-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Roger Carmine

Address 11431 Sandpiper Way ZIP 95946

Phone —

Email Address —

SUPPORT CARD 984: ROGER CARMINE

Response to Sup 984-1

Please see Master Response 1.

Support Card 985

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 985-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ROGER L CHAPMAN

Address 14329 HANEL TRUCKEE CA ZIP 96161

Phone _____

Email Address _____

SUPPORT CARD 985: ROGER CHAPMAN

Response to Sup 985-1

Please see Master Response 1.

Support Card 986

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 986-1

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Name(s) Ralf / Ann / Mark Ivey

Address PO Box 133 Smartsville ZIP 95977

Phone

Email Address

SUPPORT CARD 986: ROLF, ANN, AND MARK IVEY

Response to Sup 986-1

Please see Master Response 1.

Support Card 987

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 987-1

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Name(s) ROMUALD CHORON

Address 18831 Hilltop Rd Penn Valley ZIP 95946

Phone 719 429 9788

Email Address N/A

SUPPORT CARD 987: ROMUALD CHORON

Response to Sup 987-1

Please see Master Response 1.

Support Card 988

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 988-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Marsha Foster

Address 14380 Mandolin Way N.C. ZIP 95959

Phone 530 2658535

Email Address ronmarsha@gmail.com

SUPPORT CARD 988: RON AND MARSHA FOSTER

Response to Sup 988-1

Please see Master Response 1.

Support Card 989

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 989-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Marsha Foster

Address 14380 Mandolin Way Nevada City ZIP 95959

Phone 530 265 8535

Email Address ronmarsha@gmail.com

SUPPORT CARD 989: RON AND MARSHA FOSTER

Response to Sup 989-1

Please see Master Response 1.

Support Card 990

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 990-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) RON HENLEY, JACKIE SCHLOSSER

Address 3104 RELIEF HILL RD ZIP 95986

Phone 530 - 265 5145

Email Address

SUPPORT CARD 990: RON HENLEY

Response to Sup 990-1

Please see Master Response 1.

Support Card 991

Sup 991-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Cara Higgins

Address 10100 Dalewood Way, G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 991: RON AND CORA HIGGINS

Response to Sup 991-1

Please see Master Response 1.

Support Card 992

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 992-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Cora Higgins

Address 10100 Dalewood Way, G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 992: RON AND CORA HIGGINS

Response to Sup 992-1

Please see Master Response 1.

Support Card 993

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 993-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Beckie Mewes

Address 12733 Mayflower DR ZIP 95959

Phone

Email Address

SUPPORT CARD 993: RON AND BECKIE MEWES

Response to Sup 993-1

Please see Master Response 1.

Support Card 994

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 994-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) RON SLAY

Address 15693 LORIE DR. ZIP 95949

Phone 530-277-2521

Email Address RONSLAY@GMAIL.COM

SUPPORT CARD 994: RON SLAY

Response to Sup 994-1

Please see Master Response 1.

Support Card 995

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 995-1

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Name(s) RON & RHONDA SLAY

Address 15693 LORIE DR. ZIP 95949

Phone 530 277 2521

Email Address RONSLAY@GMAIL.COM

SUPPORT CARD 995: RON AND RHONDA SLAY

Response to Sup 995-1

Please see Master Response 1.

Support Card 996

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 996-1

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Name(s) Ron & Ethel Tuttle

Address 20105 Buck Ridge Rd ZIP 95949

Phone 530-346-7166

Email Address

SUPPORT CARD 996: RON AND ETHEL TUTTLE

Response to Sup 996-1

Please see Master Response 1.

Support Card 997

Sup 997-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) RON & VICKI WEISER

Address 13793 SUN FOREST DR.; PENN VALLEY, CA ZIP 95946

Phone 530 277-2785

Email Address SCHVOOGIE7@ATT.NET

SUPPORT CARD 997: RON AND VICKI WEISER

Response to Sup 997-1

Please see Master Response 1.

Support Card 998

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 998-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ron & Beckie Mewes

Address 12733 MAYFLOWER DR ZIP 95959

Phone (530) 477-6405

Email Address

SUPPORT CARD 998: RON AND BECKIE MEWES

Response to Sup 998-1

Please see Master Response 1.

Support Card 999

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 999-1

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Name(s) RONALD NEVIS

Address 11414 SEAN WAY ZIP 95949

Phone

Email Address RON.NEVIS@C21CORNERSTONE.COM

SUPPORT CARD 999: RONALD NEVIS

Response to Sup 999-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Min **Support Card 1000**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1000-1

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Name(s) Ronald Picken

Address 101 W McKnight Way Suite B217 ZIP 95949

Phone

Email Address raponetwo@gmail.com

SUPPORT CARD 1000: RONALD PICKEN

Response to Sup 1000-1

Please see Master Response 1.

Support Card 1001

Sup 1001-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ronald Skewes

Address 10565 Sky Cir. Grass Valley ZIP 95949

Phone 1530-575-4002

Email Address fredy's dadday@Gmail.Com

SUPPORT CARD 1001: RONALD SKEWES

Response to Sup 1001-1

Please see Master Response 1.

Support Card 1002

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1002-1

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Name(s) RONALD.C, SKEWES

Address 10565 SKY CIRCLE ZIP 95949

Phone 530 - 575 - 4002

Email Address Frelysdaddy(@)gmail.com

SUPPORT CARD 1002: RONALD SKEWES

Response to Sup 1002-1

Please see Master Response 1.

Support Card 1003

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1003-1

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Name(s) Ronald Buzzard

Address 23127 Sunset Ridge Dr. ZIP 95602

Phone (530) 320-8673 (Auburn Ca.)

Email Address

SUPPORT CARD 1003: RONALD BUZZARD

Response to Sup 1003-1

Please see Master Response 1.

Support Card 1004

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1004-1

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Name(s) RONNIE THOMAS

Address 16730 TIERRA RD, GV ZIP 95949

Phone (530) 448-2334

Email Address thomasfpe@gmail.com

SUPPORT CARD 1004: RONNIE THOMAS

Response to Sup 1004-1

Please see Master Response 1.

Support Card 1005

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1005-1

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Name(s) **Rosalyn F. Johansen**

Address 11371 Monarch Ct. ZIP Auburn, CA 95602-8388

Phone

Email Address

SUPPORT CARD 1005: ROSALYN JOHANSEN

Response to Sup 1005-1

Please see Master Response 1.

Support Card 1006

Sup 1006-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) ROSANNE PALMER

Address 149 ST JOHNS DR ZIP 95945

Phone (530) 263-6997

Email Address rosannepalmerdesign@gmail.com

SUPPORT CARD 1006: ROSANNE PALMER

Response to Sup 1006-1

Please see Master Response 1.

Support Card 1007

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1007-1

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Name(s) ROSEMARIE MORRIS

Address 504 SILVA AVE NEVADA CITY CA ZIP 95959

Phone 707-718-7267

Email Address NONE

SUPPORT CARD 1007: ROSEMARIE MORRIS

Response to Sup 1007-1

Please see Master Response 1.

Support Card 1008

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1008-1

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Name(s) Ross Crary

Address 12193 Pasquale Rd. ZIP 95959

Phone

Email Address RC222rem@Comcast.Net

222

SUPPORT CARD 1008: ROSS CRARY

Response to Sup 1008-1

Please see Master Response 1.

Support Card 1009

Sup 1009-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ross Crary

Address 12193 Pasquale RD Nevada City CA ZIP 95959

Phone

Email Address fc222rm@comcast.net

SUPPORT CARD 1009: ROSS CRARY

Response to Sup 1009-1

Please see Master Response 1.

Support Card 1010

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1010-1

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Name(s) ROXANA HILL

Address 13529 WOLF RD GV, CA ZIP 95949

Phone 530·277·3639

Email Address rhill7@LIVE.com

SUPPORT CARD 1010: ROXANA HILL

Response to Sup 1010-1

Please see Master Response 1.

Support Card 1011

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1011-1

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Name(s) Roy Ramey

Address 227 Nevada St. Nevada City ZIP 95959

Phone 530-559-5927

Email Address royramey212@yahoo.com

SUPPORT CARD 1011: ROY RAMEY

Response to Sup 1011-1

Please see Master Response 1.

Support Card 1012

Sup 1012-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Russ Broughan

Address 11763 Skylark Ct, Auburn Ca ZIP 95602

Phone

Email Address Russ898@gmail.com

SUPPORT CARD 1012: RUSS BROUGHAN

Response to Sup 1012-1

Please see Master Response 1.

Support Card 1013

Sup 1013-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Russ & Janet Howell

Address 16068 Mackinaw Wy, G.V. ZIP 95949

Phone (530)615-8558

Email Address janethow2140@gmail.com

SUPPORT CARD 1013: RUSS AND JANET HOWELL

Response to Sup 1013-1

Please see Master Response 1.

Support Card 1014

Sup 1014-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MR. RUSSELL H. PETERSON



Address 12841 BUTTERFLY DR ZIP

Phone NEVADA CITY, CA 95959-8977

Email Address

SUPPORT CARD 1014: RUSSEL PETERSON

Response to Sup 1014-1

Please see Master Response 1.

Support Card 1015

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1015-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Russell King

Business Gregory Creek, LLC Ph 272-8328

Address 200 Auburn Folsom Rd., Ste. 201, Auburn ZIP 95603

Email Address russell.king@king-engineering-Inc.com

SUPPORT CARD 1015: RUSSEL KING

Response to Sup 1015-1

Please see Master Response 1.

Support Card 1016

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1016-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Russell + Brigette Lorang

Address 18062 Wildflower Dr. Penn Valley ZIP 95946

Phone 916-709-1535

Email Address russlorang@gmail.com

SUPPORT CARD 1016: RUSSEL AND BRIGETTE LORANG

Response to Sup 1016-1

Please see Master Response 1.

Support Card 1017

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1017-1

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Name(s) Russell Robert Prinz

Address 20488 California Street, N.S.D, California ZIP 95960

Phone (530) 648-7873

Email Address russell.prinz55@gmail.com

SUPPORT CARD 1017: RUSSEL PRINZ

Response to Sup 1017-1

Please see Master Response 1.

Support Card 1018

Sup 1018-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Russell Williams

Address 12861 Lakeshore North ZIP 95602

Phone 916 759 0773

Email Address rusty228@yahoo.com

SUPPORT CARD 1018: RUSSEL WILLIAMS

Response to Sup 1018-1

Please see Master Response 1.

Support Card 1019

Sup 1019-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ruth Poulter

Address 451 Holly Dr ZIP 95945

Phone

Email Address

SUPPORT CARD 1019: RUTH POULTER

Response to Sup 1019-1

Please see Master Response 1.

Support Card 1020

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1020-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Ryan Deniz

Address 562 Douglas Ave G.V. ZIP 95945

Phone (530) 320-4965

Email Address

SUPPORT CARD 1020: RYAN DENIZ

Response to Sup 1020-1

Please see Master Response 1.

Support Card 1021

Sup 1021-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Ryan Tidwell

Address 109 Martin St ZIP 95959

Phone (530) 557-5423

Email Address rtidwell333@gmail.com

SUPPORT CARD 1021: RYAN TIDWELL

Response to Sup 1021-1

Please see Master Response 1.

Support Card 1022

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1022-1

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Name(s) Ryan DeYoung

Address 427 Spring St Nev City ZIP 95959

Phone 858-880-6872

Email Address VON49197@gmail.com

SUPPORT CARD 1022: RYAN DEYOUNG

Response to Sup 1022-1

Please see Master Response 1.

Support Card 1023

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1023-1

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Name(s) Ryan Holmes

Address 19678 Panther Ct Grass Valley ZIP 95949

Phone 760-792-0347

Email Address

SUPPORT CARD 1023: RYAN HOLMES

Response to Sup 1023-1

Please see Master Response 1.

Support Card 1024

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1024-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) S. Paulus & M. Paulus

Address [redacted] PO Box 382 ZIP 95924

Phone

Email Address

SUPPORT CARD 1024: S. AND M. PAULUS

Response to Sup 1024-1

Please see Master Response 1.

Support Card 1025

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1025-1

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Name(s) S. FRANCOIS

Address 15757 Wolf Mtn. ID ZIP 95949

Phone

Email Address

SUPPORT CARD 1025: S. FRANCONE

Response to Sup 1025-1

Please see Master Response 1.

Support Card 1026

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1026-1

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Name(s) SALLY SALIVAR

Address P O Box 910 Rough & Ready, CA ZIP 95975

Phone NO CALLS PLEASE

Email Address NOL

SUPPORT CARD 1026: SALLY SALIVAR

Response to Sup 1026-1

Please see Master Response 1.

Support Card 1027

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1027-1

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Name(s) Sam Griffith

Address 10830 Bartlett Dr. G.V. ZIP 95945

Phone 530-273-3477

Email Address

SUPPORT CARD 1027: SAM GRIFFITH

Response to Comment 1027-1

Please see Master Response 1.

Support Card 1028

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1028-1

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Name(s) Sam Griffith

Address 10830 Bartlett Dr. G.V. ZIP 95945

Phone 530-273-3777

Email Address

SUPPORT CARD 1028: SAM GRIFFITH

Response to Sup 1028-1

Please see Master Response 1.

Support Card 1029

Sup 1029-1

I support re-opening the Idaho-Maryland Mine

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Name(s) SAM MacGregor G.V. NATIVE

Address 13878 COLFAX HWY. GRASS VALLEY ZIP 95945

Phone 530 - 273 - 8043

Email Address macgregorsonic@gmail.com

MacGregor SHEET METAL FABRICATION

SUPPORT CARD 1029: SAM MACGREGOR

Response to Sup 1029-1

Please see Master Response 1.

Support Card 1030

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1030-1

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Name(s) SAM MARSICO/ SUSAN MARSICO

Address 15232 METCALF RD. GRASS VALLEY ZIP 95949

Phone 530 272 9310

Email Address SAM_MULE@ATT.NET

SUPPORT CARD 1030: SAM AND SUSAN MARSICO

Response to Sup 1030-1

Please see Master Response 1.

Support Card 1031

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1031-1

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Name(s) Sam Youngman

Address 591 Delia Dr Grass Valley CA 95945

Phone

Email Address

SUPPORT CARD 1031: SAM YOUNGMAN

Response to Sup 1031-1

Please see Master Response 1.

Support Card 1032

Sup 1032-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Samantha Peebles

Address 516 whiting St ZIP 95945

Phone 530 802 6091

Email Address Samantha.Peebles005@gmail.com

SUPPORT CARD 1032: SAMANTHA PEEBLES

Response to Sup 1032-1

Please see Master Response 1.

Support Card 1033

Sup 1033-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Samantha Randall

Address 15047 Kelly Way ZIP 95945

Phone (530) 277-3214

Email Address randallpetcare@gmail.com

SUPPORT CARD 1033: SAMANTHA RANDALL

Response to Sup 1033-1

Please see Master Response 1.

Support Card 1034

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1034-1

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Name(s) SAMUEL R. PHILLIPS

Address 20812 BREWER RD, GV ZIP 95949

Phone

Email Address

SUPPORT CARD 1034: SAMUEL PHILLIPS

Response to Sup 1034-1

Please see Master Response 1.

Support Card 1035

Sup 1035-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Samuel Youngman

Address 591 Della Ct ZIP 95945 7016

Phone Grass Valley Ca

~~Email Address~~ 530-273-3091

SUPPORT CARD 1035: SAMUEL YOUNGMAN

Response to Sup 1035-1

Please see Master Response 1.

Support Card 1036

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1036-1

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Name(s) Sam Youngman

Address 591 Delia Ct Grass Valley CA ZIP 95945

Phone

Email Address

SUPPORT CARD 1036: SAM YOUNGMAN

Response to Sup 1036-1

Please see Master Response 1.

Support Card 1037

I support re-opening the Idaho-Maryland Mine

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Sup 1037-1

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Name(s) Mike Pemberton and Sandra Collins

Address 13150 Ooti Ct. Grass Valley ZIP 95949

Phone 530-913-8489

Email Address MikenSandi@peoplepc.com

SUPPORT CARD 1037: SANDRA COLLINS

Response to Sup 1037-1

Please see Master Response 1.

Support Card 1038

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1038-1

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Name(s) Sandra Knapp

Address P.O. Box 933 North Sanhuan ZIP 95960

Phone 530 292-1192

Email Address

SUPPORT CARD 1038: SANDRA KNAPP

Response to Sup 1038-1

Please see Master Response 1.

Support Card 1039

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1039-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sandra Tishlarich

Address 15734 Kayla Win Ct ZIP 95945

Phone Grass Valley, CA

Email Address

SUPPORT CARD 1039: SANDRA TISHLARICH

Response to Sup 1039-1

Please see Master Response 1.

Support Card 1040

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1040-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) MIKE PEMBERTON & SANDRA COLLINS

Address 13150 COTI CRT, GV ZIP 95949

Phone 530-913-8489

Email Address MIKENSANDI@PEOPLEPC.COM

SUPPORT CARD 1040: SANDRA COLLINS

Response to Sup 1040-1

Please see Master Response 1.

Support Card 1041

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 1041-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SANDY HALL /"I WANT TO SEE SOMETHING GET DONE WITH THIS PROPERTY, BUT I NEED MORE INFO."

Address GREENHORN RD. ZIP 95945

Phone (530) 272-1355

Email Address — NONE — (NO INTERNET HERE)

SUPPORT CARD 1041: SANDY HALL

Response to Sup 1041-1

Please see Master Response 1.

Support Card 1042

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1042-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sarah Maslov

Address 10972 Allison Ranch Rd. G.V. ZIP 95949

Phone (530) 263-9613

Email Address superglueqal@ymail.com

* honored to be a part of the team - send me employment opportunities

SUPPORT CARD 1042: SARAH MASLOV

Response to Sup 1042-1

Please see Master Response 1.

Support Card 1043

Sup 1043-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SCOTT LITTLE

Address 11596 MARNA DR ZIP 95945

Phone (530) 265 9966

Email Address N/A

SUPPORT CARD 1043: SCOT LITTLE

Response to Sup 1043-1

Please see Master Response 1.

Support Card 1044

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1044-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SCOT LITTLE

Address 11596 MYRNA DR ZIP 95945

Phone 530 263-9966

Email Address N/A

SUPPORT CARD 1044: SCOT LITTLE

Response to Sup 1044-1

Please see Master Response 1.

Support Card 1045

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1045-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SCOTT & MARCI LANDRE

Address 11178 EDWARD DR GRASS VALLEY CA ZIP 95949

Phone

Email Address

SUPPORT CARD 1045: SCOTT AND MARCI LANDRE

Response to Sup 1045-1

Please see Master Response 1.

Support Card 1046

Sup 1046-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Sean Bernard

Address 11279 Kelly Ct. Grass Valley CA ZIP 95949

Phone 408 679 3964

Email Address hondo339@gmail.com

SUPPORT CARD 1046: SEAN BERNARD

Response to Sup 1046-1

Please see Master Response 1.

Support Card 1047

Sup 1047-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) SEAN DOLBEE

Address 20926 Clydesdale Pl ZIP 95949

Phone 530-315-7677

Email Address dolbee555@yahoo.com

SUPPORT CARD 1047: SEAN DOLBEE

Response to Sup 1047-1

Please see Master Response 1.

Support Card 1048

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1048-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sean Minor / Robert Hedrick

Business Auburn Moving & Storage Ph 5308238685

Address 10000 Hill View Rd. Newcastle, CA 95658 ZIP

Email Address info@auburnmoving.com

SUPPORT CARD 1048: SEAN MINOR

Response to Sup 1048-1

Please see Master Response 1.

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Support Card 1049

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1049-1

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Name(s) Sean O'Brien

Address 12978 Aurora Close Nevada City ZIP 95959

Phone (530) 265-0172

Email Address seano@thegrid.net

SUPPORT CARD 1049: SEAN O'BRIEN

Response to Sup 1049-1

Please see Master Response 1.

Support Card 1050

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1050-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Marie Wegener Cancela & Sean Reynolds

Address 18773 Easy St. Penn Valley, CA ZIP 95946

Phone

Email Address

SUPPORT CARD 1050: SEAN REYNOLDS

Response to Sup 1050-1

Please see Master Response 1.

Support Card 1051

Sup 1051-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Shawn & Candace Kelly

Address PO Box 2921 ZIP 95945

Phone 530-575-1886

Email Address ShawnKelly56@Gmail.com

SUPPORT CARD 1051: SHAUN AND CANDACE KELLY

Response to Sup 1051-1

Please see Master Response 1.

Support Card 1052

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1052-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Shawn Bratcher

Address 16242 Lance Dr, Truckee ZIP 96161

Phone 530 591 6607

Email Address bratcherbuilt@gmail.com

SUPPORT CARD 1052: SHAWN BRATCHER

Response to Sup 1052-1

Please see Master Response 1.

Support Card 1053

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1053-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Shawn & Louise Kobliska

Address 23074 Sunset Ridge Auburn ZIP 95602

Phone 530.320.8936

Email Address

SUPPORT CARD 1053: SHAWN AND LOUISE KOBLISKA

Response to Sup 1053-1

Please see Master Response 1.

Support Card 1054

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1054-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SHAWN ONEILL & LINDA MONTANO

Address PO BOX 678 GV ZIP 95945

Phone 530-330-0274

Email Address sdocon1@gmail.com

SUPPORT CARD 1054: SHAWN ONEILL

Response to Sup 1054-1

Please see Master Response 1.

Support Card 1055

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1055-1

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Name(s) Sheri Anastasio

Address 55 Wendy Cir ZIP 95945

Phone 530-210-6253

Email Address firecopper@sbcglobal.net

SUPPORT CARD 1055: SHERI ANASTASIO

Response to Sup 1055-1

Please see Master Response 1.

I support re-opening the Idaho-Maryland Mine **Support Card 1056**

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1056-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sherri & Brent Oakley

Address 18211 Indian Springs Rd. ZIP 95946

Phone 530/432-9565

Email Address oakleysw@aol.com

SUPPORT CARD 1056: SHERRI AND BRENT OAKLEY

Response to Sup 1056-1

Please see Master Response 1.

Support Card 1057

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1057-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BRENT / SHERRI OAKLEY

Address 18211 INDIAN SPRINGS Rd ZIP 95946

Phone 510. 693 .2024

Email Address OAKLEYSW@AOL.COM

SUPPORT CARD 1057: SHERRI AND BRENT OAKLEY

Response to Sup 1057-1

Please see Master Response 1.

Support Card 1058

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1058-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Shirley Weldemeir

Address 112 S School St #7 ZIP 95945

Phone

Email Address LoriWelde777@Gmail.com

Mailed Feb 23, 22

SUPPORT CARD 1058: SHIRLEY WELDEMERE

Response to Sup 1058-1

Please see Master Response 1.

Support Card 1059

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1059-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Shirley Waldemere

Address 112 S School St ZIP 959456444

Phone

Email Address Lori Welde777 @ Gmail.com

SUPPORT CARD 1059: SHIRLEY WELDOMERE

Response to Sup 1059-1

Please see Master Response 1.

Support Card 1060

Sup 1060-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) SHIRLYN VOGEL

Address 19193 CHAPARRAL DR ZIP 95946

Phone 530.913.2005

Email Address SHIRLYN.VOGEL@YAHOO.COM

SUPPORT CARD 1060: SHIRLEY VOGEL

Response to Sup 1060-1

Please see Master Response 1.

Support Card 1061

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1061-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Stephen Longacre

Address 13878 Meadow Dr. Grass Valley ZIP 95945

Phone 530 271-3764

Email Address

SUPPORT CARD 1061: STEPHEN LONGACRE

Response to Sup 1061-1

Please see Master Response 1.

Support Card 1062

Sup 1062-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Stephen Waterbrook

Address 3020 Somerset Dr ZIP 95945

Phone

Email Address

SUPPORT CARD 1062: STEPHEN WATERBROOK

Response to Sup 1062-1

Please see Master Response 1.

Support Card 1063

Sup 1063-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Steve Borgnis

Address PO Box 252 Cedar Ridge ZIP 95924

Phone 530-263-7100

Email Address SBorg@ATI.NET

SUPPORT CARD 1063: STEVE BORGNIS

Response to Sup 1063-1

Please see Master Response 1.

Support Card 1064

Sup 1064-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) STEVE BONGNIS

Address PO BOX 252 COLFAX ZIP 95924

Phone

Email Address SBONG@ATT.NET

SUPPORT CARD 1064: STEVE BORGNIS

Response to Sup 1064-1

Please see Master Response 1.

Support Card 1065

Sup 1065-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) STEVE CLIFTON

Address 13072 SOMERSET DR ZIP 95945

Phone 714 4128250

Email Address AZANCUDOMAN @ Yahoo .com

SUPPORT CARD 1065: STEVE CLIFTON

Response to Sup 1065-1

Please see Master Response 1.

Support Card 1066

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1066-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve & Donna Clover

Address 11510 LAKESHORE N ZIP 95602

Phone 650-520-5898

Email Address Steve.Clover57@gmail.com

SUPPORT CARD 1066: STEVE CLOUD

Response to Sup 1066-1

Please see Master Response 1.

Support Card 1067

Sup 1067-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Steve Elder, Christi IAMICA

Address 14003 IAVA CAP Mine Rd ZIP 95959

Phone 530-9139984

Email Address steve@IAVACAPMINE.COM

SUPPORT CARD 1067: STEVE ELDER

Response to Sup 1067-1

Please see Master Response 1.

Support Card 1068

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1068-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve & Shirley Engell

Address 126 W. Berry Hill Dr #121 ZIP 95945

Phone (530) 477-7529

Email Address

SUPPORT CARD 1068: STEVE AND SHIRLEY ENGELL

Response to Sup 1068-1

Please see Master Response 1.

Support Card 1069

Sup 1069-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve Gonet

Address 12599 Francis Dr GV ZIP 95949

Phone

Email Address Good job! Good luck!

SUPPORT CARD 1069: STEVE GONET

Response to Sup 1069-1

Please see Master Response 1.

Support Card 1070

I support re-opening the Idaho-Maryland Mine.

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Sup 1070-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve & Jennifer Gonet

Address 12599 Francis Dr. GV CA ZIP 95949

Phone 530-613-3740

Email Address

SUPPORT CARD 1070: STEVE AND JENNIFER GONET

Response to Sup 1070-1

Please see Master Response 1.

Support Card 1071

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1071-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve Hurliman

Address 15766 Vandevere Rd. ZIP 95949

Phone 916 663-1590

Email Address

SUPPORT CARD 1071: STEVE HURLIMAN

Response to Sup 1071-1

Please see Master Response 1.

Support Card 1072

Sup 1072-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) STEVE O'BRIEN - (EX RANGER, EMPIRE MINE STATE PARK)

Address 12156 PINE CREST DRIVE ZIP 94959

Phone 530 273 5366

Email Address BULLSEYE50876@SBCGLOBAL.NET

SUPPORT CARD 1072: STEVE O'BRIEN

Response to Sup 1072-1

Please see Master Response 1.

Support Card 1073

Sup 1073-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Steve Pachaud

Address 1557 Mulberry Dr Grass Valley, CA ZIP 95945

Phone 530-802-1239

Email Address

SUPPORT CARD 1073: STEVE PACHAUD

Response to Sup 1073-1

Please see Master Response 1.

Support Card 1074

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1074-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) STEVE & BARBARA SHAPPERT

Address 15853 THIEL WAY ZIP 95949

Phone 530-446-3311

Email Address SHAPPERT0261@GMAIL.COM

SUPPORT CARD 1074: STEVE AND BARBARA SHAPPERT

Response to Sup 1074-1

Please see Master Response 1.

Support Card 1075

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1075-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Barbara Shappert & Steve Shappert

Address 15853 Thiel Way G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 1075: STEVE AND BARBARA SHAPPERT

Response to Sup 1075-1

Please see Master Response 1.

Support Card 1076

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1076-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steve Smith

Address 11875 Rogue House Place ZIP 95945

Phone

Email Address jordrew@comcast.net

SUPPORT CARD 1076: STEVE SMITH

Response to Sup 1076-1

Please see Master Response 1.

Support Card 1077

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1077-1

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Name(s) Steve + Rachel Wade

Address 14522 Deerhaven Lane N.C. ZIP 95959

Phone 557-9655

Email Address

SUPPORT CARD 1077: STEVE AND RACHEL WADE

Response to Sup 1077-1

Please see Master Response 1.

Support Card 1078

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1078-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steven Barnes

Address 13773 Squirrel Creek Rd ZIP 95945

Phone

Email Address wanabinnit e gmail.com

SUPPORT CARD 1078: STEVEN BARNES

Response to Sup 1078-1

Please see Master Response 1.

Support Card 1079

Sup 1079-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Steven E Sharsmitt
15560 Shannon Way
Nevada City CA 95959-8944

yes

Name(s) _____

Address _____ ZIP _____

Phone 530-913-5025

Email Address steve.sharsmitt@att.net

SUPPORT CARD 1079: STEVEN SHARSMITT

Response to Sup 1079-1

Please see Master Response 1.

Support Card 1080

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1080-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Steven B Holli

Address 304 Sutton Way #8 G.V. Ca. ZIP 95945

Phone (530) 615-4139

Email Address

SUPPORT CARD 1080: STEVEN HOLLI

Response to Sup 1080-1

Please see Master Response 1.

Support Card 1081

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1081-1

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Name(s) Steven Kuester

Address 17992 Jayhawk Dr Penn Valley ZIP 95946

Phone 530-798-0717

Email Address skuester1@gmail.com

SUPPORT CARD 1081: STEVEN KUESTER

Response to Sup 1081-1

Please see Master Response 1.

Support Card 1082

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1082-1

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Name(s) Sue Sins

Address 311 Bennett St. #4 Grass Valley, CA 95945-6857 ZIP

Phone 530-6156860

Email Address Sue1946Sins@gmail.com

SUPPORT CARD 1082: SUE SINS

Response to Sup 1082-1

Please see Master Response 1.

Support Card 1083

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1083-1

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Name(s) Sumita Davis

Address 17568 Blue Tent School Rd ZIP 95959

Phone —

Email Address —

SUPPORT CARD 1083: SUMITA DAVIS

Response to Sup 1083-1

Please see Master Response 1.

Support Card 1084

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1084-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) SUSAN & Lonnie Jueck

Address PO Box 156 Rough + Ready, CA ZIP 95975

Phone 530 274-9104

Email Address susanj477@att.net

SUPPORT CARD 1084: SUSAN AND LONNIE JUECK

Response to Sup 1084-1

Please see Master Response 1.

Support Card 1085

Sup 1085-1

I support re-opening the Idaho-Maryland Mine

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Name(s) SUSAN WALSH

Address 12376 VALLEY VIEW RD NEVADA CITY ZIP 95959

Phone 559-804-8993

Email Address SWALSH2008@gmail.com

SUPPORT CARD 1085: SUSAN WALSH

Response to Sup 1085-1

Please see Master Response 1.

Support Card 1086

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1086-1

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Name(s) Ms Suzanne King

Address 10175 Grinding Rock Dr ZIP Grass Valley, CA 95949

Phone

Email Address shortsassyLass@yahoo.com

SUPPORT CARD 1086: SUZANNE KING

Response to Sup 1086-1

Please see Master Response 1.

Support Card 1087

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1087-1

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Name(s) Suzette & Doug Orlic

Address 11321 Northview Dr ZIP 95959

Phone 530-362-0837

Email Address zette660@gmail.com

SUPPORT CARD 1087: SUZETTA AND DOUG URLIE

Response to Sup 1087-1

Please see Master Response 1.

Support Card 1088

Sup 1088-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Suzie Bailey

Address P.O. Box 58 G.V. ZIP 95945

Phone 530-305-1816

Email Address N/A

SUPPORT CARD 1088: SUZIE BAILEY

Response to Sup 1088-1

Please see Master Response 1.

Support Card 1089

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1089-1

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Name(s) T. Trathen + B. Wiederhold

Address 14071 Tahoe View Dr. GV ZIP 95945

Phone

Email Address

SUPPORT CARD 1089: T. TRATHAN

Response to Sup 1089-1

Please see Master Response 1.

Support Card 1090

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1090-1

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Name(s) Tadha Hennessy

Address 14618 Tyler-Foote Rd., Nevada City, CA ZIP 95959

Phone (530)470-2368

Email Address tadhenn@gmail.com

SUPPORT CARD 1090: TADHG HENNESSY

Response to Sup 1090-1

Please see Master Response 1.

Support Card 1091

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1091-1

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Name(s) TAMARA McFARLAND - WILLIAM ALLSOP

Address 17910 VINTAGE DR ZIP 95949

Phone

Email Address HSIERRA1@YAHOO.COM

SUPPORT CARD 1091: TAMARA MCFARLAND

Response to Sup 1091-1

Please see Master Response 1.

Support Card 1092

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1092-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tammy Andreozzi

Address PO Box 2660 NC ZIP 95959

Phone

Email Address livinlife08@gmail.com

SUPPORT CARD 1092: TAMMY ANDREOZZI

Response to Sup 1092-1

Please see Master Response 1.

Support Card 1093

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1093-1

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Name(s) Taura Whitehead

Address 15526 Cascade Dr ZIP 95959

Phone 209 620-0004

Email Address taura.whitehead@gmail.com

SUPPORT CARD 1093: TAURA WHITEHEAD

Response to Sup 1093-1

Please see Master Response 1.

Support Card 1094

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1094-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) TAVA Riley

Address 10880 Alta St, Grass Valley ZIP 95945

Phone 530-559-8279

Email Address Tavariley@yahoo.com

SUPPORT CARD 1094: TAVA RILEY

Response to Sup 1094-1

Please see Master Response 1.

Support Card 1095

Sup 1095-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) TED SCRUGGS

Address 101 W. MCKNIGHT WAY # 121 GRASS VALLEY ZIP 95949

Phone 530 913-8116

Email Address TCORNSTAR@GMAIL.COM

SUPPORT CARD 1095: TED SCRUGGS

Response to Sup 1095-1

Please see Master Response 1.

Support Card 1096

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1096-1

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Name(s) TED SCRUGGS

Address 101 W. MCKNIGHT Wy. #121 ZIP 95949

Phone 913816

Email Address 1CORNSTAR@GMAIL.COM

SUPPORT CARD 1096: TED SCRUGGS

Response to Sup 1096-1

Please see Master Response 1.

Support Card 1097

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1097-1

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Name(s) Gene & TerA Yeoman

Address P.O. BOX 711 North San Juan ZIP 95960

Phone 530292-1135

Email Address tera.yeoman@gmail.com

SUPPORT CARD 1097: TERA AND GENE YEOMAN

Response to Sup 1097-1

Please see Master Response 1.

Support Card 1098

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1098-1

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Name(s) _____

Address _____ ZIP _____

Terence & Robin Prechter
15071 Applewood Lane
Nevada City, CA 95959

Phone _____

_____

SUPPORT CARD 1098: TERENCE AND ROBIN PRECHTER

Response to Sup 1098-1

Please see Master Response 1.

Support Card 1099

Sup 1099-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) TERESA BAUMGARTNER

Address 104 PARKSIDE PL. ZIP 95959

Phone 265-0784

Email Address

SUPPORT CARD 1099: TERESA BAUMGARTNER

Response to Sup 1099-1

Please see Master Response 1.

Support Card 1100

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1100-1

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Name(s) TERESA BAUMGARTNER

Address 104 PARKSIDE PL, / NEVADA CITY ZIP CA 95959

Phone

Email Address

SUPPORT CARD 1100: TERESA BAUMGARTNER

Response to Sup 1100-1

Please see Master Response 1.

Support Card 1101

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1101-1

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Name(s) TERESA BAUMGARTNER

Address 104 PARKSIDE PL/NEVADA CITY CA ZIP 95959

Phone

Email Address

SUPPORT CARD 1101: TERESA BAUMGARTNER

Response to Sup 1101-1

Please see Master Response 1.

Support Card 1102

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1102-1

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Name(s) Jeff Thompson

Address 10198 Rincon Way ZIP 95602

Phone

Email Address indiamguy@gmail

SUPPORT CARD 1102: TERRY THOMPSON

Response to Sup 1102-1

Please see Master Response 1.

Support Card 1103

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1103-1

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Name(s) MR + MRS TERRY! MERRITT

Address 19788 OCELOT DRIVE ZIP 95949

Phone 650 477-3419

Email Address gem.merritt@sbcglobal.net

SUPPORT CARD 1103: TERRYL MERRITT

Response to Sup 1103-1

Please see Master Response 1.

Support Card 1104

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1104-1

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Name(s) Theressa Bonetti

Address P.O Box 2093 ZIP 95946

Phone 530-305-7488

Email Address momz2chichi@Gmail.com

SUPPORT CARD 1104: THERESSA BONETTI

Response to Sup 1104-1

Please see Master Response 1.

Support Card 1105

I support re-opening the Idaho-Maryland Mine.

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Sup 1105-1

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Name(s) Theresa Kingsbury

Address 10521 Dixon Rd, GV ZIP 95945

Phone 530-913-2566

Email Address theresa_kingsbury@yahoo.com

SUPPORT CARD 1105: THERESA KINGSBURY

Response to Sup 1105-1

Please see Master Response 1.

Support Card 1106

Sup 1106-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Thomas Burns

Business Burns Plastering Ph

Address Yuba City ZIP 95991

Email Address We need mines - Fact of life

SUPPORT CARD 1106: THOMAS BURNS

Response to Sup 1106-1

Please see Master Response 1.

Support Card 1107

I support re-opening the Idaho-Maryland Mine.

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Sup 1107-1

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Name(s) THOMAS GLENN COOPMAN II

Address 11070 BROCKWAY RD #122 ZIP 96161

Phone 530-562-7480

Email Address ctommy410@gmail.com

I'M A REPUBLICAN 3RD GENERATION

SUPPORT CARD 1107: THOMAS G. COOPMAN

Response to Sup 1107-1

Please see Master Response 1.

Support Card 1108

I support re-opening the Idaho-Maryland Mine

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Sup 1108-1

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Name(s) Thomas McDermott

Address 12458 Muhlebach Truckee ZIP 96161

Phone 530 587-4786

~~Email Address~~ NA

SUPPORT CARD 1108: THOMAS MCDERMOTT

Response to Sup 1108-1

Please see Master Response 1.

Support Card 1109

Sup 1109-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Thomas Schmidt

Address 35 Wendy circle ZIP 95945

C. PHONE- Phone 530-615-9590

Email Address Tom S@G.MAIL.COM

SUPPORT CARD 1109: THOMAS SCHMIDT

Response to Sup 1109-1

Please see Master Response 1.

Support Card 1110

Sup 1110-1

I support re-opening the Idaho-Maryland Mine

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Name(s) TIM CACY

Address 10319 PEKOLEE DR, G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 1110: TIM CACY

Response to Sup 1110-1

Please see Master Response 1.

Support Card 1111

Sup 1-1111

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Tim Calloway

Address P.O. Box 1780 Cedar Ridge ZIP 95924

Phone 530-559-1952

Email Address TAC@goldmineconsultant.com

SUPPORT CARD 1111: TIM CALLAWAY

Response to Sup 1111-1

Please see Master Response 1.

Support Card 1112

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1112-1

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Name(s) Tim Harrington

Address 17627 Greenhorn Rd. G.V. ZIP 95945

Phone 530-263-1377

Email Address minesearcher1963@att.net

SUPPORT CARD 1112: TIM HARRINGTON

Response to Sup 1112-1

Please see Master Response 1.

Support Card 1113

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1113-1

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Name(s) Tim Leach

Address 13949 Bitney Springs Rd ZIP 95959

Phone 530-955-5354

Email Address leachtm64@gmail.com

SUPPORT CARD 1113: TIM LEACH

Response to Sup 1113-1

Please see Master Response 1.

Support Card 1114

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1114-1

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Name(s) Tim McCALL

Address 424 S. Auburn St. G.V. ZIP 95945

Phone

Email Address

SUPPORT CARD 1114: TIM MCCALL

Response to Sup 1114-1

Please see Master Response 1.

Support Card 1115

I support re-opening the Idaho-Maryland Mine.

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Sup 1115-1

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Name(s) Tim & Maria McKim

Address 25363 Rodeo Flat Rd Auburn ZIP 95602

Phone 916-825-2039

Email Address Reliancelaundryinc@icloud.com

SUPPORT CARD 1115: TIM AND MARIA MCKIM

Response to Sup 1115-1

Please see Master Response 1.

Support Card 1116

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1116-1

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Name(s) Tim & Maria McKim

Address 25363 Rodeo Flat Rd ZIP 95602

Phone 916-825-2039

Email Address TimMcKim12@Gmail.com

SUPPORT CARD 1116: TIM AND MARIA MCKIM

Response to Sup 1116-1

Please see Master Response 1.

Support Card 1117

Sup 1117-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Tim, Shea, Becky & Jerry Merry

Address 12185 Woodland ct. Auburn Ca. ZIP 95602

Phone 530-906-2523

Email Address TimMerry1@gmail.com

SUPPORT CARD 1117: TIM, SHEA, BECKY, AND JERRY MERRY

Response to Sup 1117-1

Please see Master Response 1.

Support Card 1118

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 1118-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tim Palya

Address 338 N. School St ZIP 95945

Phone 530-277-7002

Email Address

SUPPORT CARD 1118: TIM PALUA

Response to Sup 1118-1
Please see Master Response 1.

Support Card 1119

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1119-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) ROBINSON ENTERPRISES - TIM ROBINSON

Business ROBINSON ENTERPRISES, INC Ph 530-265-5844

Address 293 LOWER GRASS VALLEY RD NEVADA CITY ZIP 95959

Email Address Trobinson@robinsonenterprises.com

SUPPORT CARD 1119: TIM ROBINSON

Response to Sup 1119-1

Please see Master Response 1.

Support Card 1120

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1120-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Tina Stoutner
PO Box 221
Penn Valley, CA 95946

SUPPORT CARD 1120: TINA STOUTNER

Response to Sup 1120-1

Please see Master Response 1.

Support Card 1121

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1121-1

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Name(s) Todd + Paula NEWMAN

Address 11920 Spenceville Rd ZIP 95946

Phone 530-432-5036

Email Address Mom2kt@RocketMail.com

SUPPORT CARD 1121: TODD AND PAULA NEWMAN

Response to Sup 1121-1

Please see Master Response 1.

Support Card 1122

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1122-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tom Amesbury

Address 415 Colfax Ave. Grass Valley ZIP 95945

Phone 530-945-6276

Email Address tom@forco-op.com

SUPPORT CARD 1122: TOM AMESBURY

Response to Sup 1122-1

Please see Master Response 1.

Support Card 1123

Sup 1123-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) TOM ANDERSEN

Address 420 MAIN ST, NEVADA CITY ZIP 95959

Phone 530 265 5565

Email Address JULIETTEZ@COMCAST.NET

SUPPORT CARD 1123: TOM ANDERSEN

Response to Sup 1123-1

Please see Master Response 1.

Support Card 1124

Sup 1124-1

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tom ANDERSEN

Address 420 MAIN ST. N.C ZIP 95959

Phone 530 265 5565

Email Address JULIETEZ@COMCAST.NET

SUPPORT CARD 1124: TOM ANDERSEN

Response to Sup 1124-1

Please see Master Response 1.

Support Card 1125

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1125-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tom L FALLS

Address 18742 Lodestone Ct ZIP 95946

Phone

Email Address MARILYN FALLS @ ATT.NET

SUPPORT CARD 1125: TOM FALLS

Response to Sup 1125-1

Please see Master Response 1.

Support Card 1126

Sup 1126-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Tom Jacobson & Donna Salmonson

Address 15053 Arrowhead Ln ZIP 95945

Phone 530-613-1706 530-613-9582

Email Address tomjacobson63 deegeebeecee @gmail.com

SUPPORT CARD 1126: TOM JACOBSON

Response to Sup 1126-1

Please see Master Response 1.

Support Card 1127

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Tom Kempf

Address 15756 Rattlesnake Rd ZIP 95945

Phone 828-702-1337

Email Address tomk101@icloud.com.

Sup 1127-1

SUPPORT CARD 1127: TOM KEMPF

Response to Sup 1127-1

Please see Master Response 1.

Support Card 1128

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1128-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Tom & Kathy Sackman

Address 23972 Redwood Court ZIP 95602

Phone

Email Address TomSack@USAMedia.TV

SUPPORT CARD 1128: TOM AND KATHY SACKMAN

Response to Sup 1128-1

Please see Master Response 1.

Support Card 1129

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1129-1

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Name(s) Tom & Kathy Sackman

Address 10556 Combie Rd. Auburn ZIP 95602

Phone

Email Address tomsack@usamedia.tv

SUPPORT CARD 1129: TOM AND KATHY SACKMAN

Response to Sup 1129-1

Please see Master Response 1.

Support Card 1130

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1130-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) Tom & Konny Schultz

Address 15514 Ricky Ct. ZIP 95949

Phone

Email Address

SUPPORT CARD 1130: TOM AND KONNY SCHULTZ

Response to Sup 1130-1

Please see Master Response 1.

Support Card 1131

I support re-opening the Idaho-Maryland Mine

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Sup 1131-1

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Name(s) Tom Stockton

Address 21348 John Born Rd, PV ZIP 95946

Phone 530-432-4166

Email Address t.stockton.px@gmail.com

SUPPORT CARD 1131: TOM STOCKTON

Response to Sup 1131-1

Please see Master Response 1.

Support Card 1132

I support re-opening the Idaho-Maryland Mine

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Sup 1132-1

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Name(s) TONY AND CARI° TAMAYO

Address 17313 Hwy 49 ZIP 95959

Phone 530-913-7314

Email Address TONYTGPA@GMAIL.COM

SUPPORT CARD 1132: TONY AND CARI TAMAYD

Response to Sup 1132-1

Please see Master Response 1.

Support Card 1133

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1133-1

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Name(s) Travis Peebles

Address 516 Whiting St ZIP 95945

Phone (530) 210-7269

Email Address Trauspeebles93@gmail.com

SUPPORT CARD 1133: TRAVIS PEEBLES

Response to Sup 1133-1

Please see Master Response 1.

Support Card 1134

Sup 1134-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Trent and Michelle Wooster

Address 19400 Buck Ridge Rd ZIP 95949

Phone (707) 382-1190

Email Address trentwooster@Hotmail.Com

SUPPORT CARD 1134: TRENT AND MICHELLE WOOSTER

Response to Sup 1134-1

Please see Master Response 1.

Support Card 1135

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1135-1

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Name(s) Tricia Allen

Address 315 Alta St. Apt C ZIP 95945

Phone

Email Address tcwolhin@gmail.com

SUPPORT CARD 1135: TRICIA ALLEN

Response to Sup 1135-1
Please see Master Response 1.

Support Card 1136

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1136-1

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Name(s) NATHAN HOOKER, TRISTA HENCLEY

Address 158 WEST OLYMPIA DR ZIP 95945

Phone 530-575-6685

Email Address fordracing66@hotmail.com

SUPPORT CARD 1136: TRISTA HENCLEY

Response to Sup 1136-1

Please see Master Response 1.

Support Card 1137

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1137-1

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Name(s) TRISTA HEWLEY / NATHAN HOOKER GRASS VALLEY

Address 158 WEST OLYMPIA DRIVE ZIP 95945

Phone 530-440-3876

Email Address tristah1988@gmail.com

SUPPORT CARD 1137: TRISTA HEWLLEY AND NATHAN HOOKER

Response to Sup 1137-1

Please see Master Response 1.

Support Card 1138

Sup 1138-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Troy + Debbie Frederick

Address 11817 Squirrel Crk Rd. ZIP 95945

Phone 530 205-9597

Email Address debdeblovesbowling@gmail.com

SUPPORT CARD 1138: TROY AND DEBBIE FREDERICK

Response to Sup 1138-1

Please see Master Response 1.

Support Card 1139

I support re-opening the Idaho-Maryland Mine

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Sup 1139-1

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Name(s) Tucker Citizens

Address 14899 Nugget Lane #R ZIP 95945

Phone 530 913 1609

Email Address N/A

SUPPORT CARD 1139: TUCKER CIRZIUS

Response to Sup 1139-1

Please see Master Response 1.

Support Card 1140

Sup 1140-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Tyler & Elyse Harhrove

Address 15603 Rome Estates Rd ZIP 95959

Phone (530) 263-4186

Email Address harhrovety@gmail.com

SUPPORT CARD 1140: TYLER AND ELSYE HARGROVE

Response to Sup 1140-1

Please see Master Response 1.

Support Card 1141

I support re-opening the Idaho-Maryland Mine

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Sup 1141-1

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Name(s) Tyler Patchin

Address 13380 Rough and Ready Hwy ZIP 95975

Phone 530-788-6166

Email Address tylerpatchin@hotmail.com

SUPPORT CARD 1141: TYLER PATCHIN

Response to Sup 1141-1
Please see Master Response 1.

Support Card 1142

Sup 1142-1

I support re-opening the Idaho-Maryland Mine

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Name(s) Valmore & Mary Gauthier

Address 14184 Caroline Way G.V. ZIP 95949

Phone

Email Address

SUPPORT CARD 1142: VALMORE AND MARY GAUTHIER

Response to Sup 1142-1

Please see Master Response 1.

Support Card 1143

I support re-opening the Idaho-Maryland Mine.

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Sup 1143-1

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Name(s) Valmore & Mary Gauthier

Address 14184 Caroline Way, G.V. ZIP 95949

Phone 530-559-3537

Email Address mgauthieruhsd@hotmail.com

SUPPORT CARD 1143: VALMORE AND MARY GAUTHIER

Response to Sup 1143-1

Please see Master Response 1.

Support Card 1144

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Sup 1144-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) VAN ANTHONY

Address 12590 NOTTINGHAM LN ZIP 95949

Phone 530-913-6087

Email Address VAN_ANTHONY@MSN.COM

SUPPORT CARD 1144: VAN ANTHONY

Response to Sup 1144-1

Please see Master Response 1.

Support Card 1145

Sup 1145-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) VERN / CARROL ELKINS

Address 26871 TABLE MEADOW RD ZIP 95602

Phone 530-320-8079

Email Address ELKACRES@YAHOO.COM.

SUPPORT CARD 1145: VERN AND CAROL ELKINS

Response to Sup 1145-1

Please see Master Response 1.

Support Card 1146

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1146-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Vivienne LAhey

Address 114 Woodcrest Way ZIP 95945

Phone 530-205-9221

Email Address 8vivi and max@ATT.Net

SUPPORT CARD 1146: VIVIENNE LAHEY

Response to Sup 1146-1

Please see Master Response 1.

Support Card 1147

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1147-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) W. ALLSOP T. MCFARLAND

Address 17914 VINTAGE DR ZIP 95949

Phone

Email Address HISIERRA1@YAHOO.COM CLEAN UP TAX MONEY SHOULD GO TO INFRASTRUCTURE & HWY 49)

SUPPORT CARD 1147: W. ALLSOP MCFARLAND

Response to Sup 1147-1

Please see Master Response 1.

Support Card 1148

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1148-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Walter Snook

Address 13246 La Barr Meadows ZIP 95949

Phone (530) 274-1042

Email Address wsnook@gmail.com

SUPPORT CARD 1148: WALTER SNOOK

Response to Sup 1148-1

Please see Master Response 1.

Support Card 1149

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1149-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Warren Hooker

Address 13493 Grand Oaks Place Gr. ZIP 95949

Phone 530 273 9708

Email Address

SUPPORT CARD 1149: WARNER HOOKER

Response to Sup 1149-1

Please see Master Response 1.

Support Card 1150

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1150-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) WARNER HOOKER

Address 13493 GRAND OAKS pl. GV ZIP 95949

Phone 530 273 9708

Email Address

SUPPORT CARD 1150: WARNER HOOKER

Response to Sup 1150-1

Please see Master Response 1.

Support Card 1151

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1151-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) WARNER HOOKER

Address 13493 GRAND OAK PL ZIP 95949

Phone 5302739708

Email Address NONE

SUPPORT CARD 1151: WARNER HOOKER

Response to Sup 1151-1

Please see Master Response 1.

Support Card 1152

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1152-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) D. Wayne Glenn

Address 10193 Woodleaf circle GV CA. ZIP 95949-7509

Phone 1-530-272-8204

Email Address WNLglenn@gmail.com

SUPPORT CARD 1152: WAYNE GLENN

Response to Sup 1152-1

Please see Master Response 1.

Support Card 1153

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1153-1

- Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) WAYNE KLAUER.

Address 20020 OPHIR RD. G.V. ZIP 95949

Phone 530-913-4065

Email Address WAYNE KLAUER@YAHOO.COM

SUPPORT CARD 1153: WAYNE KLAUER

Response to Sup 1153-1

Please see Master Response 1.

Support Card 1154

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1154-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Wayne McKay

Address 143 Carpenter St Grass Valley CA ZIP 95946

Phone 5302772804

Email Address

SUPPORT CARD 1154: WAYNE MCKAY

Response to Sup 1154-1

Please see Master Response 1.

Support Card 1155

Sup 1155-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) WAYNE SCHWARTZKOPF

Address 14969 N. COUNTRY RD ZIP 95945

Phone 1-530 277 6758

Email Address NONE

SUPPORT CARD 1155: WAYNE SCHWARTZKOPF

Response to Sup 1155-1

Please see Master Response 1.

Support Card 1156

Sup 1156-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) WAYNE SCHWARTZKOPF

Address 14969 N. COUNTRY RD GV, CA. ZIP 95949

Phone 530 277 6758

Email Address NONE

SUPPORT CARD 1156: WAYNE SCHWARTZKOPF

Response to Sup 1156-1

Please see Master Response 1.

Support Card 1157

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. "Mining MADE This town."

Name(s) Wendy M. Horn

Address 12201 ALTA SIERRA DR ZIP 95949

Phone (530 575-4027

Email Address Wendy_horn@msn.com

Sup 1157-1

SUPPORT CARD 1157: WENDY HORN

Response to Sup 1157-1

Please see Master Response 1.

Support Card 1158

Sup 1158-1

I support re-opening the Idaho-Maryland Mine

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Wendy Hutton, Joseph Hutton

Address 18193 Fair Oaks Dr P.V. ZIP 95946

Phone 530 263 4099

Email Address wenhutton@gmail.com

SUPPORT CARD 1158: WENDY AND JOSEPH HUTTON

Response to Sup 1158-1

Please see Master Response 1.

Support Card 1159

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1159-1

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Name(s) Wendy Norman

Address 275 Dorsey Dr. #22 G.V, CA ZIP 95945

Phone (530) 798-1245

Email Address Wenika1976@gmail.com

SUPPORT CARD 1159: WENDY NORMAN

Response to Sup 1159-1

Please see Master Response 1.

Support Card 1160

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1160-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Wes Hawkins

Address 13322 Elderberry LN, GV ZIP 95945

Phone ~~916~~ 913-8583

Email Address whawhunter@gmail.com

SUPPORT CARD 1160: WES HAWKINS

Response to Sup 1160-1

Please see Master Response 1.

Support Card 1161

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1161-1

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Name(s) Wes Mayfield

Address 13540 North Keystone Ct Penn Valley ZIP 95946

Phone 530-362-1243

Email Address wesma@hillsflatlumber.com

SUPPORT CARD 1161: WES MAYFIELD

Response to Sup 1161-1
Please see Master Response 1.

Support Card 1162

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Wes Mayfield

Address 13540 North Keystone ct. Penn Valley ZIP 95946

Phone 530-362-1243

Email Address wesma@hillsflatlumber.com

Sup 1162-1

SUPPORT CARD 1162: WES MAYFIELD

Response to Sup 1162-1

Please see Master Response 1.

Support Card 1163

Sup 1163-1

I support re-opening the Idaho-Maryland Mine.

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Name(s) Wilbur Marshall

Address 13942 Sun Forest DR ZIP 95946

Phone Penn Valley, CA

Email Address 916-216-0667

SUPPORT CARD 1163: WILBUR MARSHALL

Response to Sup 1163-1

Please see Master Response 1.

Support Card 1164

Sup 1-1164

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Willard Schoelkerman

Address 12505 COMBIE Rd Auburn ZIP 95602

Phone

Email Address

SUPPORT CARD 1164: WILLARD SCHOELLERMAN

Response to Sup 1164-1

Please see Master Response 1.

Support Card 1165

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1-1165

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) TAMARA McFARLAND - WILLIAM ALLSOP

Address 17910 VINTAGE DR ZIP 95949

Phone

Email Address HSIERRA1@YAHOO.COM

SUPPORT CARD 1165: WILLIAM ALLSOP

Response to Sup 1165-1

Please see Master Response 1.

Support Card 1166

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1166-1

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Name(s) WILLIAM BISHOP

Business REALTOR Ph

Address 12303 SHADY CREEK DR NEVADA CITY ZIP 95959

Email Address bishopsues2@MSN.COM

SUPPORT CARD 1166: WILLIAM BISHOP

Response to Sup 1166-1

Please see Master Response 1.

Support Card 1167

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1167-1

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Name(s) William & Gloria Burke

Address PO Box 1553 ZIP 95945

Phone

Email Address weburke84@gmail.com

SUPPORT CARD 1167: WILLIAM AND GLORIA BURKE

Response to Sup 1167-1

Please see Master Response 1.

Support Card 1168

Sup 1168-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) William + Cherie Carlson

Address 13717 Torrey Pines Dr ZIP 95602

Phone 916·496·2697

Email Address CherieCCarlson@gmail.com

SUPPORT CARD 1168: WILLIAM AND CHERIE CARLSON

Response to Sup 1168-1

Please see Master Response 1.

Support Card 1169

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) William & Sandra Ferris

Address 2036 Nevada city Hwy #139 ZIP 95949

Phone

Email Address

Sup 1169-1

SUPPORT CARD 1169: WILLIAM AND SANDRA FERRIS

Response to Sup 1169-1

Please see Master Response 1.

Support Card 1170

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) William B Mudd

Address P.O. Box 2888, GV ZIP 95945

Phone 530-559-8583

Email Address willybmd@gmail.com

Sup 1170-1

SUPPORT CARD 1170: WILLIAM MUDD

Response to Sup 1170-1
Please see Master Response 1.

Support Card 1171

Sup 1171-1

I support re-opening the Idaho-Maryland Mine

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Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

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Name(s) William Mudd

Address 19432 Buck Mt Rd ZIP 95949

Phone 530-559-8583

Email Address willybmd@gmail.com

SUPPORT CARD 1171: WILLIAM MUDD

Response to Sup 1171-1
Please see Master Response 1.

Support Card 1172

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1172-1

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Name(s) MURRAY, William & Jan

Address 27350 Sweetland Rd ZIP 95960

Phone 530-388-8288

Email Address

SUPPORT CARD 1172: WILLIAM AND JAN MURRAY

Response to Sup 1172-1

Please see Master Response 1.

Support Card 1173

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1173-1

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Name(s) Mr. & Mrs. William B. Ogilvie II

Address 15926 Sanford Rd., Grass Valley, CA ZIP 95949

Phone 916-588-0880

Email Address bcogilvie2@gmail.com

SUPPORT CARD 1173: WILLIAM OGILVIE

Response to Sup 1173-1

Please see Master Response 1.

Support Card 1174

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1174-1

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Name(s) William Asher

Address PO Box 68, Rough & Ready ZIP 95975

Phone 530 273 1569

Email Address wpasher@gmail.com

SUPPORT CARD 1174: WILLIAM ASHER

Response to Sup 1174-1
Please see Master Response 1.

Support Card 1175

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1175-1

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) William E. & Sandra M. Ferris

Address 2036 Nevada city Hwy #139 ZIP 95945

Phone (530) 205-6578

Email Address SMF(Lexa2@Gmail.com)

SUPPORT CARD 1175: WILLAM AND SANDRA FERRIS

Response to Sup 1175-1

Please see Master Response 1.

Support Card 1176

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1176-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine. Wilma J. Wilkinson

Name(s) Marvin L. Rackley

Address 437 Sacramento St. Nevada City ZIP 95959

Phone 530 559 0814

Email Address mrack41@gmail.com

SUPPORT CARD 1176: WILMA WILKINSON

Response to Sup 1176-1
Please see Master Response 1.

Support Card 1177

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1177-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Wilton & Patricia Fryor

Address 10814 Red Ln, Smartsville CA ZIP 95977

Phone 530-432-6515

Email Address barwf@hotmail.com

(we are in Nevada Co)

SUPPORT CARD 1177: WILTON AND PATRICIA FRYER

Response to Sup 1177-1

Please see Master Response 1.

Support Card 1178

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1178-1

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Name(s) Wilton B Fryer

Address 10814 Red Ln Smartsville ZIP 95977

Phone 530-432-6515

Email Address barwf@hotmail.com

SUPPORT CARD 1178: WILTON FRYER

Response to Sup 1178-1

Please see Master Response 1.

Support Card 1179

Sup 1179-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Name(s) Zeth Cooper & Jennifer Peterson

Address 13275 Lost Lake Rd ZIP 95945

Phone 530-320-4958

Email Address zethcooper@yahoo.com

SUPPORT CARD 1179: ZETH COOPER

Response to Sup 1179-1

Please see Master Response 1.

Support Card 1180

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1180-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Zeth Cooper

Address 13275 Lost Lake Rd ZIP 95945

Phone (530) 320-4958

Email Address ZethCooper@Yahoo.Com

SUPPORT CARD 1180: ZETH COOPER

Response to Sup 1180-1

Please see Master Response 1.

Support Card 1181

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1181-1

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Name(s) Zola Rackley

Address 437 Sacramento St Nevada City ZIP 95959

Phone 530 559 0815

Email Address zolarack@gmail.com

SUPPORT CARD 1181: ZOLA RACKLEY

Response to Sup 1181-1

Please see Master Response 1.

Support Card 1182

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Sup 1182-1

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Name(s) Beeman

Address 27765 Table meadow Rd ZIP 95602

Phone Auburn, CA

Email Address

SUPPORT CARD 1182: BEEMAN

Response to Sup 1182-1

Please see Master Response 1.

Support Card 1183

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1183-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Todd

Address 25112 Gna Valley Rd. ZIP 95600

Phone

Email Address ddski4fun@hotmail.com

SUPPORT CARD 1183: DODD

Response to Sup 1183-1

Please see Master Response 1.

Support Card 1184

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Sup 1184-1

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Name(s) Wyman

Address 23146 Sequoia Ct ZIP 95602

Phone

Email Address

SUPPORT CARD 1184: WYMAN

Response to Sup 1184-1

Please see Master Response 1.

Individual Letter 1

From: Aaron Zueck
To: Idaho MMEIR
Subject: Rise Gold DEIR Comment
Date: Monday, February 7, 2022 7:32:12 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom it May Concern,

Ind 1-1 I am writing to express my strong resistance to the reopening of the Idaho Maryland Mine. I am a resident of Nevada County for over eight years, and currently reside approximately 2 miles from the proposed mine site, along with my wife and two young children.

Ind 1-2 Of the many valid reasons to oppose the mine, my chief concern is energy usage. The mine intends to increase our county's electrical use by 12% at a time when our county's Environment Action Plan aims to *decrease* our power consumption.

Ind 1-3 I can't see a way for our county's leadership to responsibly support a project like this when it works against our goals of a more sustainable future, extracts a resource that is already abundantly available from previous mining, and primarily serves the goal of wealth generation for investors who do not live in this area.

I grew up in Wyoming, in an economy dependent on extractive industry, and moved here in part to flee the boom and bust associated with mining and drilling. I thought Nevada County had put the extraction mindset behind it. I hope it has.

Thank you for your time,

Aaron Zueck
arzueck@gmail.com
530-565-5232

INDIVIDUAL LETTER 1: AARON ZUECK

Response to Comment Ind 1-1

The commenter is a local resident and is opposed to reopening the Idaho-Maryland Mine. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 1-2

The commenter states that the project would increase energy demand in the County which would be inconsistent with the County's Energy Action Plan. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 1-3

The commenter states that extractive industries are prone to boom and bust cycles and is opposed to the project. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 2

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@nevada.ca.us

MAR 07 2022

February 28, 2022

Dear Nevada County Board of Supervisors:

Ind 2-1 I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine. I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 2-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for more 80 years: 182,500 tons per year! More tailings that polluting big rig diesel trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 2-3 INCREASE GREENHOUSE GAS EMISSIONS
Diesel haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 2-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will have significant and unavoidable harm even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Ind 2-5 Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise Mining Company.

Sincerely,

Abby Velasquez, 12656 Banner Lava Cap Road, Nevada City, CA 95959

INDIVIDUAL LETTER 2: ABBY VALASQUEZ

Response to Comment Ind 2-1
Please see Master Response 1.

Response to Comment Ind 2-2
Please see Master Response 8.

Response to Comment Ind 2-3
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR.

Response to Comment Ind 2-4
As noted in Chapter 4.12, Transportation, of the DEIR and reiterated by the commenter, the DEIR concluded that a significant and unavoidable impact would occur associated with level of service (LOS) at the SR 174/Brunswick Road intersection (see page 4.12-66). According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact. Moreover, the DEIR addressed impacts regarding whether the project would substantially increase hazards to vehicle safety under Impact 4.12-6, and concluded that with Mitigation Measures 4.12-6(a) through 4.12-6(f), a less-than-significant impact would occur. Therefore, impacts related to intersection delay at the SR 174/Brunswick Road intersection and hazardous roadway conditions were adequately addressed in the DEIR.

Response to Comment Ind 2-5
The comment presents a concluding statement and does not address the adequacy of the DEIR.

Individual Letter 3

February 2, 2022

Nevada Co. Planning Commission
950 Maidu Avenue, Suite 170
Nevada City CA 95959

RE: REOPENING OF IDAHO-MARYLAND MINE

Please, please, when reviewing the Draft Environmental Impact Report, consider the wishes of the current residents of our beautiful, and rapidly growing communities.

I am very concerned that the Rise Gold Mine will not put our best interests first. I have not read the report, but so many of my neighbors are sorely worried about the environmental impact of this type of industry. Not only the increase in traffic to our narrow, paved-over wagon roads, but the promise of high paying jobs might be great for unemployed or underemployed residents but if the administrators are opting to advertise for out of area workers, then this will also put another huge strain on our "unaffordable" housing.

Ind 3-1

Thank you for your thoughtful and informed consideration of this possibly toxic industry.

Addie Patrick

Addie Patrick
10701 Bragg Avenue
Grass Valley CA 95945

530-274-0492

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 3: ADDIE PATRICK

Response to Comment Ind 3-1

The commenter is encouraged to read the DEIR as the environmental impacts are disclosed throughout the document. Regarding the specific concerns raised in the comment, please see Chapter 4.12, Transportation, of the DEIR, Master Response 1, and Master Response 2.

Individual Letter 4

Dist 3

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

February 2, 2022

Nevada Co. Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City CA 95959

RE: REOPENING OF IDAHO-MARYLAND MINE

Please, please, when reviewing the Draft Environmental Impact Report, consider the wishes of the current residents of our beautiful, and rapidly growing communities.

Ind 4-1

I am very concerned that the Rise Gold Mine will not put our best interests first. I have not read the report, but so many of my neighbors are sorely worried about the environmental impact of this type of industry. Not only the increase in traffic to our narrow, paved-over wagon roads, but the promise of high paying jobs might be great for unemployed or underemployed residents but if the administrators are opting to advertise for out of area workers, then this will also put another huge strain on our "unaffordable" housing.

Thank you for your thoughtful and informed consideration of this possibly toxic industry.

Addie Patrick

Addie Patrick
10701 Bragg Avenue
Grass Valley CA 95945

530-274-0492

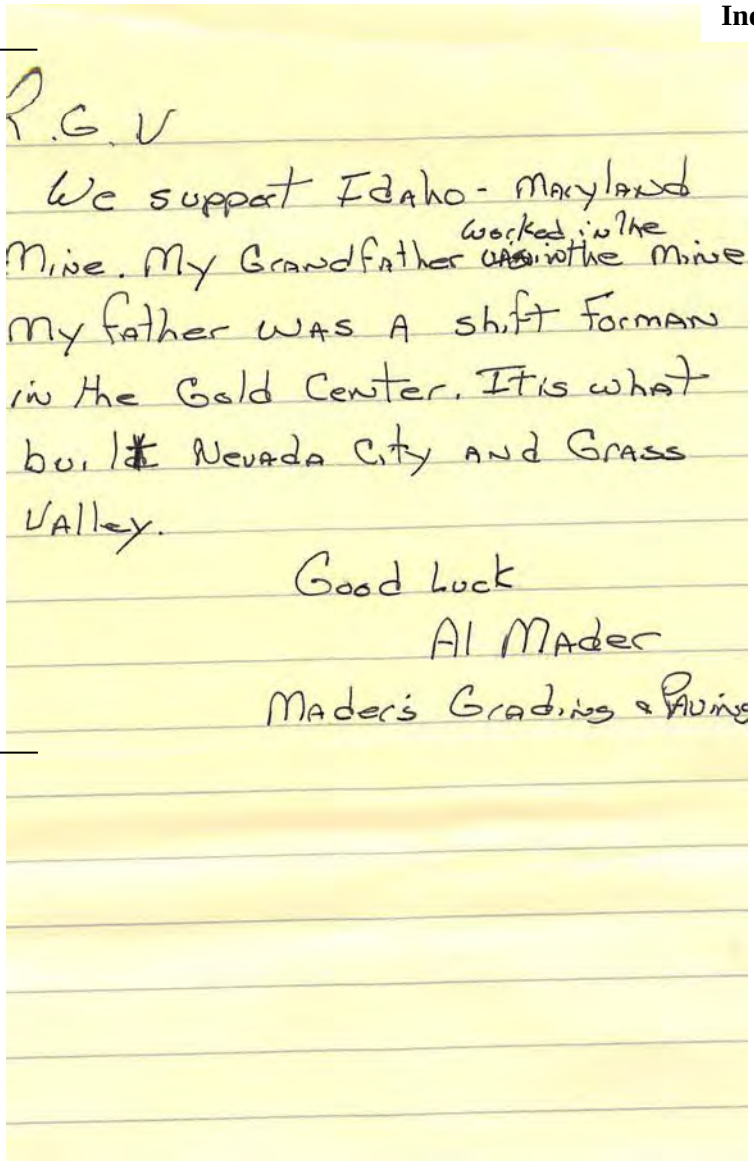
INDIVIDUAL LETTER 4: ADDIE PATRICK

Response to Comment Ind 4-1

The commenter is encouraged to read the DEIR as the environmental impacts are disclosed throughout the document. Regarding the specific concerns raised in the comment, please see Chapter 4.12, Transportation, of the DEIR, Master Response 1, and Master Response 2.

Individual Letter 5

Ind 5-1



R.G.V

We support Idaho-Maryland Mine. My Grandfather worked in the mine My father was a shift forman in the Gold Center. It is what built Nevada City and Grass Valley.

Good Luck

Al Mader

Mader's Grading & Paving

INDIVIDUAL LETTER 5: AL MADER

Response to Comment Ind 5-1

Please see Master Response 1.

Individual Letter 6

From: Alan Emerson <saintjudethedude@gmail.com>
Sent: Sunday, April 3, 2022 3:00 PM
To: Idaho MMEIR
Subject: DEIR for Idaho Maryland Mine Project

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

To whom it may concern:

Ind 6-1 I am writing in regards to the DEIR as submitted to the NC Planning Commission for the proposed mining project at the Idaho Maryland site.

I have lived in Nevada County for over 20 years now in various locations within the GV/NC region. I do not live in the local area of the mine site itself, but this is an issue that has a potential impact on the entire community. I need to also say that I can't believe we are even talking about this mining project as even being a remote possibility, as it is my recollection that previous attempts to reopen this mine have come and gone in the past. But, here we are again.

Ind 6-2 It is my considered opinion that this mine would be an absolute disaster in so many ways if permitted, but I will only focus my comments on a central area of concern that is critical to our resources and quality of life here - water. This element is essential to life here, and yet the mine proposal and the DEIR has consistently minimized the impacts to our supply of groundwater as it will be directly affected by the initial dewatering of the mine as well as the constant dewatering during continuous mining operations. The DEIR is flawed in its assumptions regarding initial

Ind 6-3 conditions, areal extent, and other hydrological concerns. The

1

considerations of effects related to dewatering cannot be adequately calculated, much less predicted in such a complex system of fractured granite and other subsurface features. Even with the best modeling and data, the risks of failure are just too great. Any well drilling company could tell you that water levels throughout the county have been falling for the last few decades and wells are being drilled deeper and deeper. The potential impacts of this proposal are serious and could very well be catastrophic. It's just not worth the risk, and as far as I can see...any rewards to be realized by the community are grossly overstated by Rise Gold.

Ind 6-3

Ind 6-4

It is my overall conclusion that Rise Gold had a hand in crafting the shoddy DEIR in such a way as to downplay and in many instances - ignore potential serious harmful impacts of the project in general, because they are in it for the buck. They don't give one nugget about the community we have here. They are carpetbaggers and interlopers looking to exploit natural resources at our expense. We need a moratorium on ALL hard rock mining proposals and projects in perpetuity here in Nevada County. The gold rush did so much harm to the area over nearly 100 years. We can't go back to that era.

Ind 6-5

Thank You ~ Alan Emerson

INDIVIDUAL LETTER 6: ALAN EMERSON

Response to Comment Ind 6-1
This comment is introductory in nature. The commenter is generally opposed to the project. The comment is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 6-2
The commenter states that the project would be "an absolute disaster" if approved. The commenter also states that the DEIR minimizes the potential impacts to groundwater supplies but does not state how. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The DEIR discusses the project's potential impacts to groundwater supplies in Chapter 4.8 (Hydrology and Water Quality). The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54–68.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 6-3
The commenter states that DEIR is flawed in describing the hydrological baseline of the underground mine workings and that impacts of the dewatering cannot be measured, but does not provide additional information. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 6-4
The commenter states that the impacts from the dewatering of the mine could be catastrophic and are not worth the risk, but does not provide additional information. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 6-5
Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

The commenter states that the DEIR was prepared by the Project Applicant in such a way as to downplay the project's impacts. CEQA does not require that the lead agency's staff directly prepare the DEIR. (14 CCR 15084(d)(3).) Instead, the lead agency is responsible for independently reviewing and ensuring that the document complies with the content- and process-related requirements of CEQA and that it presents the independent judgment of the lead agency with respect to the significance of impacts and the selection of mitigation. (14 CCR 15084(e).) The DEIR was prepared by a consulting firm on behalf of the County, under direct contract with the County, and pursuant to the direction of County staff. The DEIR was independently reviewed by County staff and presents the findings of the County with regard to the project's environmental effects. Numerous technical studies were provided by the Applicant to support preparation of the DEIR. The technical studies were independently reviewed by County staff and, where necessary, independent, third-party consultants with expertise in the relevant technical issue area to ensure adequacy. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Individual Letter 7

Formal Public Comments for the Idaho Maryland Mine DEIR

My name is Alecia Weisman,

Ind 7-1 I have a MS degree in Hydrology from the University of Nevada—Reno and a BS in Environmental Science. My work has focused largely on water quality, and I currently work in habitat restoration at the South Yuba River Citizens League (SYRCL).

Ind 7-2 I formally oppose the mine due to the significant environmental impacts that would occur as a result of the proposed mining operations. As a citizen of Nevada and Placer Counties, I am concerned that, should the Idaho-Maryland Mine reopen, mining operations would introduce pollution into our waterways, dewater groundwater, and dry up private wells that are already being adversely impacted by long periods of drought. Further, legacy mining impacts include serious health impacts for community members who may be exposed to heavy metals such as arsenic and mercury.

Ind 7-3

Ind 7-4 Further health impacts due to the massive increase in greenhouse gases that will degrade local air quality are also of concern, especially in an area that already coping with poor air quality during extended fire seasons. Mining operations, which include heavy equipment and large trucks, are slated to occur 24 hours a day, seven days a week and produce 9,000 metric tons of greenhouse gas emissions per year.

Ind 7-5 I am especially concerned with water availability in our area and do not think sufficient data exists to support whether we have enough water security to support this Mining Operation. With drought predicted as the new norm, and increasingly less water as snow in the Sierra Nevada, the Community of Grass Valley is especially vulnerable to changes in precipitation and the associated impact on regional water security. NID reports in its Plan for Water that we do not have sufficient water to support population growth in our area. Furthermore, how consistent drought has impacted local groundwater catchments has not been determined, and we cannot make decisions on this large of a project with incredible water demands without such critical data.

Ind 7-6 The Draft EIR fails to meet appropriate soil and water quality standards and has insufficient mitigations. For example, soil sampling locations on page 4.7-6 are too few/sparse for the large project area. The potential for downstream impacts to Wolf Creek are too large and significant mitigation strategies have not been identified to outline how the mine would deal with potential leaks in the water treatment pond. Potential for natural disasters that could impact the integrity of the water treatment pond on-site are many: Earthquake, extreme rain driven flooding and erosion events, fire events that could damage surrounding infrastructure and cause prolonged power outages.

Ind 7-7 As a concerned citizen and community member with a background in water quality, I simply cannot understand why the reopening of this mine is being considered. I firmly oppose the opening of the Idaho Maryland Mine.

Kind Regards, Alecia Weisman

313 Railroad Ave.
Nevada City, CA 95959

INDIVIDUAL LETTER 7: ALECIA WEISMAN

Response to Comment Ind 7-1
The commenter provides an overview of their educational background. This comment is noted.

Response to Comment Ind 7-2
The commenter believes the project will lead to negative environmental impacts and opposes the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The DEIR identifies and evaluates each of the environmental concerns raised by the commenter in DEIR Chapter 4.8 (Hydrology and Water Quality). Specifically, surface water quality is addressed by Impact 4.8-1 on DEIR, pages 4.8-41 through -53; and impacts to groundwater supplies are addressed by Impact 4.8-2 on DEIR pages 4.8-54 through -68. With implementation of the related mitigation measures, these impacts were found to be less than significant. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 7-3
The commenter states that legacy mining impacts negatively affect the community. This comment does not address the adequacy of the DEIR. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 7-4
The commenter states that the project will result in the increase of GHG emissions. The DEIR acknowledges the project's potential to emit GHGs under Impact 4.3-7 on DEIR pages 4.3-92 through 4.3-99 and determines that with mitigation, the impact would be less than cumulatively considerable. The DEIR also acknowledges the project's potential to emit particulate matter (PM10 and PM2.5) under Impact 4.3-1 on DEIR page 4.3-66 and determines that with mitigation, the impact would be less than significant. The commenter is also referred to Master Response 18 - Air Quality Thresholds and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 7-5
The commenter is concerned about the project's water usage in light of the current drought. The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 7-6
The commenter states that the DEIR fails to meet appropriate soil and water quality standards. The commenter specifically states that soil sampling locations are too few for the project area. The commenter also states that the potential for impacts to Wolf Creek are too large. Lastly, the commenter states the DEIR does not address the potential for the water treatment pond to fail. The commenter does not explain how the number of soil sample locations conducted by NV5 in its Phase II investigation is inadequate. Regarding impacts to Wolf Creek, the commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. Regarding the treatment pond, the geotechnical stability of the treatment pond is analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and required mitigations would reduce the impact to a less than significant level. (DEIR, p. 4.6-41.) The commenter is also referred to Appendix H.1 of the DEIR.

The commenter is also concerned about the potential for natural disasters or wildfire and the possibility that the Idaho-Maryland Mine operation could be subject to a prolonged power outage. Earthquakes are analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR. Rain, flooding, and erosion are analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR. Wildfire is analyzed in Chapter 4.13 (Wildfire) of the DEIR. As stated on page 3-40 of the DEIR, backup power generation would be provided by four diesel generators with a capacity to provide approximately 6 MW on a continuous basis.

Much of this comment pertains to speculative scenarios in which natural disaster could disrupt the Idaho-Maryland Mine operation. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 7-7

The commenter opposes the reopening of the Idaho-Maryland Mine. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 8

4 April, 2022

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us

Alexander Lerch
17019 Pine Peak Rd.
Grass Valley, CA 95945

Idaho Maryland Mine Draft EIR Comments

As a private citizen, I find the DEIR's analysis of air impacts **inadequate** as it relates to emissions of criteria air pollutants and our county's non-attainment status under the National and California Clean Air Acts.

At the end of Appendix E-1, there is a memorandum stating that "no available modeling tools have been proven to provide a reliable and meaningful analysis to correlate an increase in mass totals or concentrations of criteria air pollutants from an individual project to specific health effects or estimate additional pollutant non-attainmant days relative to the NAAQS or CAAQS due to a single project."

Ind 8-1

I find the DEIR's analysis distinctly inadequate as it cannot tell me the degree to which my health will be impacted. My home is just 4 miles from the mine and I have chronic asthma, so an accurate understanding of the proposed project's health effects is a necessity of very practicle concern. Indeed, CA Health and Safety Code section 41700 states "a person shall not discharge from any source whatsoever quantities of air contaminants or other material that... endanger the comfort, repose, health, or safety of any...persons or the public." I hope the County can offer an adequate analysis of these effects now, rather than seeking mitigatory funding once damage has been done years down the road.

An adequately considered EIR will answer the following, "How will my respiratory health be affected by this mine?" If this is an unanswerable question, then there is no adequate manner in which this project's impacts can be reviewed and conveyed accurately or meaningfully to the public.

INDIVIDUAL LETTER 8: ALEX LERCH

Response to Comment Ind 8-1

Please see Master Responses 18 and 19.

In addition, as detailed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, starting on page 4.3-40, the DEIR evaluates all potential air quality impacts required for analysis under CEQA in accordance with the standards of significance established by Appendix G of the CEQA Guidelines. Where project impacts are determined to result in a potentially significant impact, the DEIR requires mitigation measures to reduce all potential air quality impacts to a less-than-significant level. As such, the discussions and analysis in the DEIR are adequate under CEQA.

Individual Letter 9

From: ali zuur arnerich <azuurarnerich@gmail.com>
Sent: Monday, April 4, 2022 12:25 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine

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To whom it may concern,
I am writing to strongly oppose the re-opening of the Idaho Maryland Mine.
We as a community are still dealing with the impacts of our mining history. Why in the world we would reverse progress in such a way to add a further burden to our community's future is beyond me?

I am appalled at the short sightedness of the agencies for even allowing the process to get to this point. As a former consultant to developers, and someone who is well versed in getting through the permit process and EIR's, I know full well the power of the dollar. With enough money to mitigate, we know most projects get through. I beg of you to not let that be the case here. This area is precious, our economy is not dependent on this income. I can assure you the other forms of revenue through tourism and home prices will be severely devalued. No reason to rob Peter to pay Paul.

Ind 9-1

There are families that have built there lives and invested greatly in areas surrounding the mine. How dare this company put at risk their groundwater, their investment, their ability to sell their home in the future or their ability to pass on that land to the next generation.

History will not judge kindly those who let this move forward. We must learn from the past, protect our valuable resources and listen to the community at large who does not support this re-opening.

Thank you for taking the time,
Ali Arnerich
Nevada City Resident.

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INDIVIDUAL LETTER 9: ALI ARNERICH

Response to Comment Ind 9-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about water quality, the commenter is referred to Master Responses 13 – Historic Hydrogeologic Assessments and 14 – Adequacy of Groundwater Model.

Individual Letter 10

From: Alice Root <ramroot@comcast.net>
Sent: Friday, February 11, 2022 3:57 PM
To: Idaho MMEIR
Subject: Opposed to Risegold mine proposal

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Attn Matt Kelley:

Ind 10-1 I am a thirty plus year resident of Nevada County, living in Rough & Ready. Though we were in part drawn to Nevada County because of gold mining, we are opposed to this new mine proposal. We don't live near the proposed mining site, but think this is a terrible idea, at the wrong time and place. If it were proposed out in an unpopulated area, it might be somewhat viable, but to place this in the residential area of Grass Valley is horrific. The traffic and noise would be enough of a deterrent, but the environmental impacts beyond this do not make this a reasonable proposal. Also, this company is financially unstable, and out of the country. Please do not approve this proposal.

We vote in every election, and will vote and campaign against any supervisor that would approve this.

Sincerely,

Alice Williams-Root
Rough & Ready, CA

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INDIVIDUAL LETTER 10: ALICE WILLIAMS-ROOT

Response to Comment Ind 10-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Please refer to Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Individual Letter 11

From: Alice Root
To: Idaho MMEIR
Subject: Opposed to Risegold mine proposal
Date: Saturday, February 12, 2022 7:17:03 AM

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Ind 11-1

Attn Matt Kelley:

I am a thirty plus year resident of Nevada County, living in Rough & Ready. Though we were in part drawn to Nevada County because of gold mining, we are opposed to this new mine proposal. We don't live near the proposed mining site, but think this is a terrible idea, at the wrong time and place. If it were proposed out in an unpopulated area, it might be somewhat viable, but to place this in the residential area of Grass Valley is horrific. The traffic and noise would be enough of a deterrent, but the environmental impacts beyond this do not make this a reasonable proposal. Also, this company is financially unstable, and out of the country. Please do not approve this proposal.

We vote in every election, and will vote and campaign against any supervisor that would approve this.

Sincerely,

Alice Williams-Root
Rough & Ready, CA

INDIVIDUAL LETTER 11: ALICE WILLIAMS-ROOT

Response to Comment Ind 11-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Please refer to Master Response 1. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Individual Letter 12

From: Alison Alkon
To: BOS Public Comment
Subject: The proposed Idaho-Maryland mine
Date: Friday, February 25, 2022 12:48:43 PM

Not a resident

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Dear Supervisors,

My name is Alison Alkon. I own a property on Flying Cloud Drive off of Greenhorn road. While I don't live there full time, I am very much invested in the land in Nevada County and want to ensure that it is protected and cared for in every way possible.

Ind 12-1

I'm an environmental sociologist, meaning I study the social side of environmental issues. I've been following debates about the proposed mine, especially RISE's recent claim that there will be no proposed impact on the local air and water. This is a common claim made by petitioners. It's easy to say there will be no effects and then to have those effects occur anyway. This is what we have commonly seen in mining projects throughout the country. There are many efforts to make mining more green and sustainable, but like coal, they do more to clean the industry's reputation than its actually effects.

Further, many of the new jobs tend to require specific skills and companies tend to bring folks in for them rather than hire locally. We are in a period of record employment so the argument about jobs needs more scrutiny. What kind of jobs are these? Long-term operating or short term development?

In my professional opinion, this project is not worth the risk.

Sincerely,
Alison Alkon
Professor of Sociology
University of the Pacific

INDIVIDUAL LETTER 12: ALISON ALKON

Response to Comment Ind 12-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Please see Master Responses 1, 2, and 3.

Individual Letter 13

From: Allison Bischofberger <akmccann38@gmail.com>
Sent: Monday, April 4, 2022 4:15 PM
To: Idaho MMEIR
Subject: Comments of DEIR

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To whom it concerns:

I am writing to express my concern over the proposed reopening of the Idaho Maryland mine, specifically the DEIR's inadequacy in addressing the impact on local water quality.

Ind 13-1 I live in Chicago Park on a small farm off the Greenhorn watershed. Like many, if not most, Nevada County residents we rely on a well for our water, and already we have a high level of heavy metals present in our water, which we have tested regularly due to the history of mining and its negative impact on water quality. On page 51-52 of section 4.8 of the DEIR, it clearly states that the impact of this mine on water quality would be significant. While it does go on to suggest ways of mitigating this impact, I do believe it's enough to fully address the very real concerns for those of us who live in the vicinity, and truly the whole county. With so little rainfall this year, even the slightest of water issues cannot be ignored and will have a very detrimental impact on our quality of life.

Furthermore, my children attend Montessori House of Children, one of the schools mentioned in the report as being very close to the proposed mine, and the traffic and air quality impact is a huge concern for me in terms of their wellbeing as well as that of all the young children who currently attend that school and those who will attend in the future.

Ind 13-2 Thank you for taking the time to listen to the concerns of our community members.

Sincerely,

Allison Bischofberger
530-913-9929
14226 Greenhorn Access Rd
Grass Valley, CA 95945

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INDIVIDUAL LETTER 13: ALLISON BISCHOFBERGER

Response to Comment Ind 13-1

The comment expresses a general opinion that Mitigation Measures 4.8-1(a) through 4.8-1(e) under Impact 4.8-1 (DEIR page 4.8-41) would not sufficiently reduce potential impacts to surface or groundwater quality, but does not provide specific examples that would allow for a detailed response.

Please see Master Responses 15 and 16.

Response to Comment Ind 13-2

Please see Master Response 1, as well as the discussions and analyses in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and Chapter 4.12, Transportation, of the DEIR. As presented in Table 4.3-21 on page 4.3-80 of the DEIR, the proposed project would result in a less-than-significant impact associated with increased health risks (including at the surrounding schools).

The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 14

From: Allison Roush <allisonmroush@gmail.com>
Sent: Thursday, March 31, 2022 8:22 PM
To: Idaho MMEIR
Subject: Comments to EIR Idaho-Maryland Mine Project

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Dear Mr. Matt Kelly,

Please see the below for my comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project published on January 4, 2022.

Ind 14-1 1. Page 4.7-37 There is the possibility during an 80-year mining operation that local groundwater could be contaminated, but there is no mention of monitoring it during operation to protect the local population. There are no mitigation measures mentioned later in the text other than at the groundwater treatment plant.

Ind 14-2 2. Page 4.8-5 The drainage calculations were done on the currently existing landscape conditions, not the future conditions. This makes the assessment null and void for future impacts. It is understood that future conditions cannot be fully predicted and might change, but a base level plan was presented for where drilling and work might occur and could be applied to the assessment.

Ind 14-3 3. Figure 4.8-4 needs directional groundwater flow arrows. This figure gives the reader no indication of how the local watershed plays into things and how the local wells will be affected.

Ind 14-4 4. If the mine is dewatered and there is no clean water pumped in to replace it, there could be migration of contaminated groundwater towards private wells. What is the plan to mitigate this? Are private wells going to be monitored at least on an annual basis?

Ind 14-5 5. Page 4.8-13 In the last paragraph on the page, they say the cyclicity of the mine shifts shows that there is no fracture that connects them to the private wells. Have they done groundwater sampling to confirm there has been no contaminate migration?

Ind 14-6 6. 4.8-48 – The report says that only during the mining phase is there a possibility that the hexavalent chromium (Cr6) could leach from the PCB. The mining phase is 80 years long. Does that mean there is an 80-year time period where people (workers and residents) could be exposed to an analyte consider that can be a human health risk? This also means that the Cr6 could get into the groundwater and move through the aquifer.

a. There is no attempt in the report to research if the known contaminants have been detected in the nearby potable wells. A base-level needs to be established at all wells within a one-mile radius so future impacts can be adequately tracked. Additionally, there is only a suggested monitoring program for the nearby vicinity and onsite treatment. Future seismic activity is unknown and cannot be predicted. Though fractures might not currently exist that allow for downgradient movement to private wells, fractures could be created in the future in the case of an earthquake. It is important to get base level data to take into account any future impacts on local residents and water supplies.

Ind 14-7 7. The report states that the mine will use up non-renewable resources (Chap 5-8), and the project will also consume energy and natural resources in an irreversible way. The project freely admits this. California has been in a decade-long drought, and with climate change, it is projected to continue. This project is not prioritizing the public interest. The mining company has touted that it will make roughly 300+ jobs through this enterprise, and

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Ind 14-8

it is safe to assume that a majority of the job creation will happen in the first-year construction phase. Present-day mining is highly specialized, and due to the need for safety, it is highly mechanized. How many people will actually be employed from the local community on a long-term basis, 15? How many of these highly skilled jobs will actually be from people that currently live in the local community and not people that move in? It is not worth trading the local public's resources for the small number of jobs that are created. Additionally, the 80-year project could create environmental devastation in the area that is also not worth the public's health.

a. Page 6-6- the Project "would result in a substantial reduction in groundwater supplies, substantial alteration of drainage patterns...risk release of pollutants in flood hazard area." Again, the northern California population's water supply is not worth this alteration.

8. This EIR proposes mitigation efforts to offset the risk, but the "best choice" is to not implement the project. No implementation will not result in the community being worse off. The County and City has presented alternatives that could be utilized that would be less invasive than mining and could create local jobs. Alternatives were presented starting on page 6-12. Page 6-42 also states that the environmentally superior alternative is the "No Project (No Build) Alternative" by CEQA standards.

Thank you,

Allison Roush
614-496-9429
allisonmroush@gmail.com

--
Allison Roush

Phone: 614.596.9429
email: allisonmroush@gmail.com

INDIVIDUAL LETTER 14: ALLISON ROUSH

Response to Comment Ind 14-1

The commenter states that there is a possibility that local groundwater could be contaminated by operations and references page 4.7-37. The DEIR assesses the project's impact to water quality in Chapter 4.8 of the DEIR and concludes that the project would not cause an exceedance of water quality standards, after incorporation of mitigation.

As stated on page 119 of Appendix E.1, during mining, there will be a net inflow of groundwater into the mine workings, such that any mining activities would not affect water quality within the fractured bedrock. After mining ceases, conditions would return to those are currently exist. The proposed new mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. Due to the substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, it is highly unlikely that the proposed project would affect water quality in those wells.

Mitigation Measure 4.8-2(a) of the DEIR requires implementation of a Groundwater Monitoring Plan. As described in Section 8.0 of Appendix K.8, the groundwater monitoring includes groundwater quality sampling prior to the commencement of mine dewatering, during initial mine dewatering, and for the first year of maintenance pumping after the flooded underground workings have been dewatered. The commenter also asserts that groundwater monitoring is not required by the DEIR; however, the groundwater monitoring plan included in Appendix K.8 states that water quality will be monitored in the monitoring wells. Mitigation Measure 4.8-2(a) has been amended in the FEIR to clarify that water quality monitoring is required as part of the groundwater monitoring plan – please refer to Chapter 4, Mitigation Monitoring and Reporting Program, of this Final EIR for the final mitigation language.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 14-2

The commenter states that drainage calculations were done on the current landscape conditions and not future conditions and references page 4.8-5. This page of the DEIR discusses drainage calculations for the Centennial site. As stated on this page of the DEIR, the environmental baseline for the hydrology analysis of the Centennial Industrial Site is based on the existing conditions at the site and does not reflect the post-remediation condition that would exist following completion of the separate Centennial Industrial Site Clean-Up Project. The use of existing conditions at the Centennial Industrial Site for the hydrology analysis provides the most conservative approach for the drainage analysis. As stated on Page 4.8-5 of the DEIR, the use of existing conditions at the Centennial Industrial Site for the hydrology analysis provides the most conservative approach for the drainage analysis for the following reasons. The drainage calculations for existing conditions at the Centennial Industrial Site assume heavily wooded forest and understory cover as exists on the majority of the property at this time. Generally speaking, the existing Centennial land cover types generate less runoff compared to a post-remediated condition, whereon less absorption of runoff into the soil would occur. The on-site detention pond is designed and sized to reduce post-project stormwater flows exiting the site to not greater than

existing values. Using this standard, the detention pond for the Centennial Industrial Site would be required to hold back a greater amount of project runoff in order to equal the existing runoff condition of wooded forest and understory cover, as compared to holding back project runoff to equal the runoff that would be generated from the post-remediation condition. Therefore, using the lower existing conditions target value will result in a larger detention requirement to reduce post-development runoff to pre-development (existing condition) levels. In regard to future conditions, as explained on page 4.8-73 of the DEIR, the hydrologic calculations and detention studies for the Centennial site anticipates runoff at potential future industrial development levels, though industrial development is not proposed at this time, and separate environmental review and permitting through the County would be required prior to any on-site industrial development. Therefore, the sizing of the detention basins is conservative.

Response to Comment Ind 14-3

The commenter states that groundwater direction arrows needs to be added to Figure 4.8-4 to indicate how local watersheds effect the groundwater model and how local wells will be affected. However, Figure 4-5 of Appendix K.3 to the DEIR already shows simulated groundwater contours and flow direction can be determined from these contours. Regional groundwater flow is generally from the east to the west and approximately perpendicular to the groundwater contours shown on Figure 4-5 of Appendix K.3. As discussed in Section 4.1 of Appendix K.3 of the DEIR, the Hydrologic study area (HSA) encompasses watershed boundaries and creeks, and as discussed in Section 4.3.2 of Appendix K.3, all the major rivers/creeks that are located within the HSA were incorporated into the model and simulated in the stream-routing package within MINEDW. The elevations of riverbeds in the area were based on the LIDAR data or topographic elevations. The stream-routing package simulates interactions between a routed river and an aquifer. Therefore, local watersheds have been considered in the model and used to determine how local wells would be affected by the project.

Response to Comment Ind 14-4

The commenter asserts that dewatering could cause contaminated water to migrate to groundwater wells if no clean water replaces the water removed from the mine. As stated on page 119 of Appendix E.1, during mining, there will be a net inflow of groundwater into the mine workings, such that any mining activities would not affect water quality within the fractured bedrock. The groundwater flows into the mine workings rather than water in the mine workings flowing out into the regional groundwater. Water quality sampling from groundwater monitoring wells, which are representative of the surrounding private wells, will be conducted as described in Section 8.0 of Appendix K.8.

As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 14-5

The commenter questions whether there is groundwater sampling to show whether contaminants have migrated towards groundwater wells from the mine. As stated on page 119 of Appendix E.1, there is no evidence to indicate that the historic underground mine workings have caused any water quality impacts at any domestic well. Water sampling has been conducted from groundwater present in the Brunswick shaft and draining from the mine at Idaho-Maryland Road. No water quality sampling has been conducted in private wells. Mitigation Measure 4.8-2(a) of the DEIR requires a Groundwater Monitoring Plan. As described in Section 8.0 of Appendix K.8

the groundwater monitoring includes groundwater quality sampling prior to the commencement of mine dewatering, during initial mine dewatering, and for the first year of maintenance pumping after the flooded underground workings have been dewatered. This will provide a baseline for the groundwater quality in the area of the mine and proof that no groundwater quality changes, attributable to mine dewatered, have occurred. Because the mining activities will not provide recharge to the domestic wells, the mining activities at the project site will not affect the water quality of the domestic wells.

As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 14-6

The commenter suggests a possibility that the hexavalent chromium could leach from cemented paste backfill and become a human health risk. The groundwater flows into the mine workings rather than water in the mine workings flowing out into the regional groundwater. Nonetheless, as discussed in the DEIR, hexavalent chromium will not leach into groundwater and workers and residents would not be exposed to hexavalent chromium from cemented paste backfill. As stated on page 4.8-48 of the DEIR, the project's strategy for addressing the potential leaching of Cr+6 from CPB is not reactive (i.e., removal at the WTP), but rather proactive, whereby, as part of obtaining WDRs from the RWQCB for use of CPB, test work would be completed on CPB samples to verify that leaching of Cr+6 would not be an issue and use of the selected cement and CPB admixture would meet applicable regulatory requirements. The RWQCB has jurisdiction over placement of CPB, and approval of WDRs from the RWQCB would be necessary prior to any placement in the underground mine, ensuring compliance with water quality standards, including Cr+6 levels. In this way, the potential water quality effects related to chromium would be addressed through selection of the appropriate cement source and product, along with the proper CPB mixture, rather than by water treatment.

The commenter suggests that a baseline of groundwater quality in a one-mile radius should be established. This suggestion is already implemented by the project. Mitigation Measure 4.8-2(a) of the DEIR requires a Groundwater Monitoring Plan. As described in Section 8.0 of Appendix K.8, the groundwater monitoring includes groundwater quality sampling prior to the commencement of mine dewatering, during initial mine dewatering, and for the first year of maintenance pumping after the flooded underground workings have been dewatered. As stated on page 15 of Appendix K.8, total chromium and hexavalent chromium will be included in all sampling events. The proposed monitoring well locations are dispersed throughout the project area over several square miles (see figure 1 of Appendix K.8). This will provide a baseline for the groundwater quality in the area of the mine and proof that no groundwater quality changes, attributable to mine dewatering, has occurred. Because the mining activities will not provide recharge to the domestic wells, the mining activities at the project site will not affect the water quality of the domestic wells. In addition, as noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells, including water level and quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The commenter suggests that future seismic activity could cause fractures that allow for downgradient movement of groundwater to private wells. As discussed on page 4.6-2 of the DEIR, the overall project site is located within the Foothills Fault System. The Foothills Fault System is designated as a Type C fault zone, with low seismicity and a low rate of recurrence. The Foothills Fault System has been assigned a moment magnitude of 6.5. The nearest mapped active portion of the Foothill Fault System is approximately 25 miles northwest of the overall project site on the Cleveland Hill Fault. Notwithstanding the low seismicity and rate of occurrence in the area, a seismic event would not result in changes to groundwater flow and groundwater would continue flow into the mine workings, such that any mining activities would not affect water quality within the fractured bedrock.

Response to Comment Ind 14-7

The commenter implies that the project would result in wasteful use of energy. As discussed in Impact 4.3-9 of the DEIR, implementation of the project in combination with other cumulative development would not result in the wasteful or inefficient use of energy, resulting in a less-than-significant impact. Please also see Response to Comment Agcy 8-17. The commenter also states that the project's job creation benefits are not worth the environmental impacts. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. The commenter asserts that the project "would result in a substantial reduction in groundwater supplies; substantial alteration of drainage patterns", citing page 6-6 of the DEIR, but the commenter omits the following sentence: "However, the EIR requires mitigation in order to ensure that impacts related to hydrology and water quality are reduced to less-than-significant levels." (DEIR, p. 6-7.)

Response to Comment Ind 14-8

The commenter states that the best choice is not to implement the project and notes that the DEIR presents alternatives to the proposed project. As the commenter notes, the No Project alternative is considered the environmentally superior alternative; however, the No Project alternative does not meet the basic project objectives. Please see Master Response 1.

Individual Letter 15

From: amie ferrier <amie.l.fenwick@gmail.com>
Sent: Friday, April 1, 2022 6:39 PM
To: Idaho MMEIR
Subject: Comment on the RiseGold Draft EIR and mine proposal

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Hi,

My name is Amie Ferrier, and I live in the Cedar Ridge neighborhood of Grass Valley, very near RiseGold's proposed mine site. My husband Eli and I are both local school teachers, and Eli was born and raised here as a life-long local. I am commenting on the Draft EIR and proposal from RiseGold regarding re-opening the mine.

We treasure living in this community and are engaged neighbors and friends. We're also avid lovers of the outdoors and spend as much time as we can soaking up river rafting, backcountry skiing, mountain biking our local trail network, and loving this land.

It is precisely for these reasons that we are so deeply opposed to the reopening of this mine. We know from decades of similar disingenuous marketing that projects such as these have destructively high price tags that our community will pay for a long time to come if this is approved. We should be looking to our county's future economic growth with innovation and stewardship of resources - not looking backward to such devastatingly harmful plans as this mine reopening.

Ind 15-1 For the health of our neighbors and their young kiddos whom we teach, and for the sake of the land that we love and the clean water that is already scarce enough, please condemn RiseGold's shortsighted proposal. While our community does need more jobs, please do not assume that we want such short-term, unsafe, costly jobs as this. We don't.

Please treat this as an opportunity to demonstrate strong and courageous leadership and strongly reject RiseGold's proposal. We need stewards of our foothills with a vision for a healthy, sustainable future, and this is a powerful chance to clarify our priorities and collaborate together as a community. We unequivocally do not want this mine to re-open, and we do not want RiseGold's business. Thank you for taking the time to listen to your community.

with gratitude,
-Amie Ferrier
cell 815 529 1468
PO Box 1322, Cedar Ridge CA 95924

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Whole Music Studio
violin, fiddle, cello, and guitar instruction
plus: Baby Gang music for kiddos 0-4yrs
wholemusicstudio@gmail.com

1

INDIVIDUAL LETTER 15: AMIE FERRIER

Response to Comment Ind 15-1

Please see Master Response 1.

Individual Letter 16

From: Amy Geiser
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Comments on DEIR for Idaho-Maryland Mine
Date: Sunday, April 3, 2022 9:51:17 PM

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April 3, 2022

Mr. Matt Kelley

Senior Planner

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902

Dear Mr. Kelley:

Ind 16-1 I am writing to express my grave concerns with the recent Draft Environmental Impact Report (DEIR) submitted for the proposed reopening of the Idaho-Maryland Mine. The DEIR appears deeply flawed. I urge this commission to reject several points in the DEIR.

Ind 16-2 Additionally, there are fundamental flaws with reopening the Idaho-Maryland Mine that cannot be cured through mitigation. The analysis within the DEIR, even with these oversights and flaws, makes it clear that there is no place for the Idaho-Maryland mine reopening in such a populated area of Nevada County.

Ind 16-3 The Mine reopening cannot occur without deeply compromising the visual beauty of Nevada County, undermining the county's tourism appeal, which is centered on the arts and the outdoors, and threatening the health and wellness of our residents, communities and natural resources. The mine poses clear threats of noise pollution, dust pollution, water depletion, toxic releases into the air and water, extreme increases to traffic, visual blight, and the potential for traffic increases that threaten both key evacuation routes and key routes to reach hospital and emergency medical services.

Background on the Idaho-Maryland Mine

Ind 16-4 Rise Gold proposes to mine an average of 1,000 tons of rock per day in the reopened Idaho-Maryland Mine sites. The DEIR indicates this will require an incredible resource input to remove that much earth on a daily basis. This movement of earth will have a myriad of environmental and community impacts, and will require hundreds of trucks driving daily between the two mining sites in Nevada County, in addition to the truck movement needed to enter and leave the county.

My Background and Experience in Nevada County

Ind 16-5

As homeowners in Nevada County, my husband and I have invested our life savings to be able to call Nevada County home, for ourselves and our two children. We own a home less than a mile away from the proposed underground mining area for the Idaho-Maryland Mine. We rely upon our well for water, and we work closely with our neighbors to keep our area well-maintained and fire-safe. We continue to invest in our home to upgrade it for fire-safety, for ourselves and our neighbors. The health and safety of our children and the economic stability and longevity of this community are our top priorities.

Additionally, I also lived in Truckee, California for many years. I worked in the tourism industry, and I also worked in the schools during that time period. As such, I am deeply familiar with Nevada County and I cherish its rich beauty, wildlife habitats, art districts, outdoor activities, and tourist attractions.

Some of the many features I love about Nevada County are the following:

Ind 16-6

1. Beautiful, serene natural surroundings;
2. Terrific schools with dedicated teachers and staff;
3. Family oriented communities and activities;
4. Three cities that are Cultural Arts Districts (Grass Valley, Nevada City and Truckee);
5. A large regional hospital;
6. Wildlife habitat;
7. Outdoor sports;
8. An attractive county for tourists and friends to visit to enjoy the arts, beauty, and outdoors;
9. Many creative people who are entrepreneurs and self-starters, and who open really interesting businesses;
10. Many opportunities for music and food lovers to enjoy the area.

The Planning Commission's Responsibility as a Steward of Community Wealth and Resources

Ind 16-7

I enjoy living in Nevada County because I have noticed people are exceptionally kind. I have noticed that people work hard, and they invest their sweat equity into their communities and their property, and into each other. This is a form of wealth, albeit one that cannot always be measured through a formal accounting.

The Planning Commission is a steward of this community wealth. This wealth can cease to exist if county planning fails to support the spirit and dynamism that creates this wealth. We expect the Planning Commission to plan for the health and safety of our community. The Planning Commission is also responsible for the economic viability and environmental longevity of our community and its natural resources.

Flaws and Concerns with the DEIR

Ind 16-8

I have noted many flaws in the DEIR for the Idaho-Maryland Mine, as well as many concerns that seem to be minimized in the DEIR, and cannot be mitigated. Among them are the following:

1. **Visual Blight:**
   - Visitors and residents alike will have a huge blight on their views of this visually pristine region. This will also impact the view of tourists as they drive through the Grass Valley area up to Truckee.
   - Sierra Nevada Memorial Hospital employs almost 1000 employees

Ind 16-9

and staff, and also hosts patients and visitors. The DIER made it clear that the Mine would significantly impair their daily view.

Ind 16-10

- The visual blight would be visible from main roads and highways. This is unacceptable, as our county depends on our image of natural beauty and outdoor adventure for our many outdoor businesses.

2. Air Pollution:

Ind 16-11

- Nevada County already ranks one of the worst in the nation for air quality. We cannot afford to increase the daily dust and pollution in this county that the Mine will bring.

3. Art and Tourism Revenue will decrease when we are Rebranded as an Industrial Waste Zone:

Ind 16-12

- A Mine is incompatible with the tourism and artistic activities in Nevada County. In 2019-2020, the Arts and Cultural sector brought in almost 47 million to Nevada County.[1] The art revenue in this county depends on our image as a natural, serene and creative community. Nevada County has a unique image of a highly artistic and creative community, and this image has been cultivated over decades. Our county stands to lose this image, and therefore millions of dollars in revenue annually, if we allow a singular foreign mining interest to rebrand our community as an industrial waste zone.

4. The DEIR does not adequately address the Impact to both the Groundwater and Watersheds:

Ind 16-13

- There is no room in our county for one company to take so much water for itself and its own financial gain, at the risk of all of our wells, our watershed, and our long term planning for drought and climate change. It is abhorrent that the DEIR indicates it will deplete or pollute a large percentage of our water resources in the county, and jeopardize hundreds, if not thousands, of wells – all the while claiming that only 30 wells will be potentially impacted.

Ind 16-14

- The DEIR appears unsound in its assessment that only 30 wells will be impacted. With the dewatering, the pollutants flushed in the water, as well as the high amount of daily water needed for operation, the entire watershed in Nevada County is threatened by a reopening of the Mine. These are severe impacts that cannot be mitigated.

Ind 16-15

- Additionally, there should be a guarantee to homeowners with wells in the county. If there is to be a new DEIR, I would like a guarantee that there will be bi-annual well testing throughout the county with any Mine re-opening, not just at the 30 identified sites. I would also like an agreement that if wells are compromised anywhere in Nevada County in the event this unsound Mine is reopened, that the planning commission agrees that the county will pay the full cost for homeowners to move onto municipal water lines. Any DEIR should factor in these costs, as a bond to the county or otherwise, so that the county can cover these costs in the (very likely) event that wells and the watershed in general shall be compromised beyond what is indicated in the DEIR.

5. Emergency Services:

Ind 16-16

- I have concerns that the increase in daily truck traffic will hamper emergency evacuation routes for fire and other emergencies. At a time when homeowners are asked to take on additional costs and burdens of

maintaining the fire safety of our property, it is disingenuous to suggest that one foreign company can come in with hundreds of trucks daily, and that this will not compromise our emergency preparedness or fire safety.

Ind 16-17

- I have concerns that the increase in daily truck traffic will cause emergency medical vehicles difficulty in accessing the hospital and residents throughout the county for emergency care and transport. This has the potential to compromise our hospital and emergency response services. This should be studied further.

6. **Vehicle Pollution:**

Ind 16-18

- In addition to the sheer numbers of vehicles causing traffic and pollution, and jeopardizing emergency response, the DEIR indicates that the company will minimize diesel vehicle idling, only to the extent reasonable. This offers the community no assurances as to either the air quality or the noise issues concerning hundreds of diesel vehicles operating in the county on a daily basis.

7. **Endangering Residential Communities:**

Ind 16-19

- In the 1940's when the Idaho-Maryland Mine was still operating, Nevada County had fewer than 5000 people in urban areas, and fewer than 20,000 residents total. Today the population of Nevada County is greater than 5 times that size, at approximately 100,000. The population of young people age 18-35 is on the rise.[2] This community is growing, and people are coming here to raise their families. In the past 70 years, whole communities and neighborhoods have grown up around this ancient defunct Mine. Our entire neighborhood was built in the 1970's, after the Mine was no longer operating.

Ind 16-20

- It is inappropriate to open a defunct industrial site in the middle of neighborhoods and communities. It destroys property value, it destroys community moral, and it degrades the health of the county citizens. Additionally, the noise that will be generated threatens the physical and mental health of county residents.

Ind 16-21

- This mine threatens the livelihood of all of the entrepreneurs and artists and spiritual leaders who have worked so hard to make Nevada County a special place to live, and an attractive place for tourists and visitors.

Ind 16-22

- The historic downtowns of Grass Valley, Nevada City and Truckee must be honored as both community centers and tourist destinations if Nevada County is to thrive into the future. Threatening the image of these city centers is a threat to the economic stability of all of Nevada County.

Additional Missing Assessments in the DEIR

In addition to the problems and flaws above, the DEIR should include the following costs and assessments:

Ind 16-23

- **The DEIR should realistically assess the loss of jobs and property value Nevada County will face due to the Mine**. There are minimal jobs to be created by the Mine, and no quality jobs. There is no other financial benefit to Nevada county communities from the mine. However, the loss to our county's reputation as a beautiful, scenic, outdoor and artistic community will certainly cause a loss in tourism, visitors, and a loss in property value. These are real costs that should be assessed by an independent economic consultant. To ensure an independent assessment,

perhaps an economic consultant should be commissioned by the Planning Commission.

Ind 16-24

- **The DEIR should realistically assess the increased physical and mental health burden on our county system**. Increased dust will likely cause a rise in asthma in the region. Increased water and air pollution from asbestos and other toxins will cause other health problems. Increased noise pollution can lead to mental health issues in our residents. The DEIR should address these additional costs to the community, and how Rise Gold will pay for increased access to healthcare services in Nevada County. A large percentage of Nevada County residents have MediCal coverage, and the county systems will bear the costs of an increased need for medical and mental health services if we do not require the DEIR to assess them, and to commit to paying for them.

Ind 16-25

- **The DEIR should realistically assess the water shortage problems and well problems that opening the Mine will create, and bear the burden of proving that any future well or watershed damage is <u>not</u> due to the Mine.** Due to the concerns and flaws in the DEIR analysis, there should be biannual testing of all Nevada County wells upon owner request, and a guarantee to all Nevada County homeowners that if a problem with toxicity is detected or a well dries due to Mine operations, that the county will cover the costs of securing a municipal water supply (and seek reimbursement from Rise Gold). Rise Gold should also commit to bearing the burden of proving that any subsequent well problems are not due to mine operations, as we know that absent such an agreement, the company will outspend any resident on attorneys in its efforts to evade responsibility for ill effects of its Mining operations. A single resident is simply no match against the deep pockets of a corporation like Rise Gold in litigation, and thus the county must preemptively commit to supporting its residents in recouping costs, if it allows this Mine to reopen.

Ind 16-26

- **Rise Gold should insure against any potential seismic activity resulting from Mine activity in Nevada County.** It should not be the responsibility of individual citizens to insure against seismic damage that may be caused by this company, foreseen or unforeseen. In good faith, Rise Gold should guarantee it will bear the costs of any seismic activity reasonably thought to be caused by its mining activities.

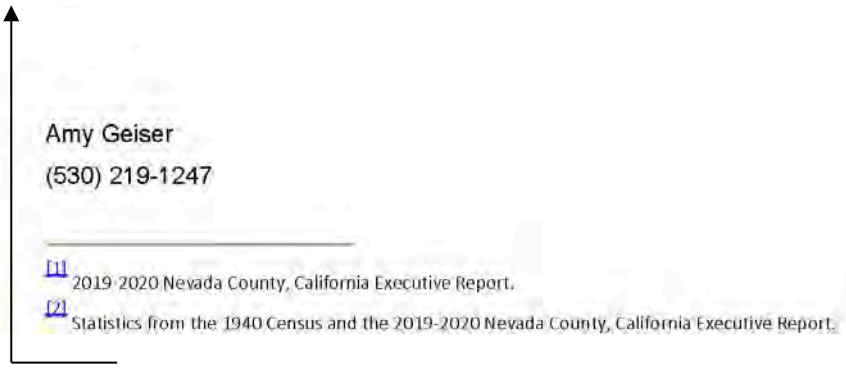
<u>Conclusion</u>

Many residents of Nevada County like me work, and cannot attend daytime meetings. However, please do not discount our voices. We are the residents who are investing daily in this community with our lives and our livelihoods.

Ind 16-27

We are counting on you to challenge this DEIR for the many flaws and oversights, and to invest in us, our community, even if it means standing up to a powerful and well-funded foreign corporate interest. For the reasons identified above, and many more, if the Mine reopens it will threaten our physical and mental health, our safety, our fire preparedness, our income and property values, our natural resources, our water and wells, our visual beauty and our well-earned reputation as an artistic, creative, scenic, and outdoor-oriented community.

Thank you for considering these concerns, and continuing to safeguard our future and the future of our children.



Amy Geiser
(530) 219-1247

[1] 2019-2020 Nevada County, California Executive Report.
[2] Statistics from the 1940 Census and the 2019-2020 Nevada County, California Executive Report.

INDIVIDUAL LETTER 16: AMY GEISER

Response to Comment Ind 16-1
The commenter states that the DEIR is flawed and urges the County to reject the project. The comment is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 16-2
The commenter states there are fundamental flaws that cannot be addressed through mitigation. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 16-3
The commenter states that the project threatens the health and wellness of the community's residents and natural resources. The commenter states that the project will have negative impacts to aesthetics, noise, air quality, hydrology, traffic, and evacuation routes. The commenter also states the project will negatively impact the region's tourism industry. The commenter does not state how the DEIR is inadequate. The project's potential impacts to aesthetics and visual resources are evaluated in DEIR Chapter 4.1 (Aesthetics). Impact 4.1-2 discusses the project's impacts to the existing visual character and quality of public views of the project site. Mitigation Measure 4.1-2 is provided requiring implementation of a landscaping plan for the project. However, as stated on DEIR page 4.1-22, the impact would be significant and unavoidable. The DEIR also analyzed noise in Chapter 4.10 (Noise and Vibration), air quality in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), traffic in Chapter 4.12 (Transportation), and evacuation routes in Chapter 4.13 (Wildfire). The commenter is also referred Master Response 5 – Evacuation Zone.

The portion of the comment regarding impacts to the tourism industry does not pertain to an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-4
The commenter summarizes portions the project description relating to the number of truck trips generated during project operation. The environmental effects of the proposed transport and placement of engineered fill are evaluated throughout the DEIR. As shown in Table 4.12-8 on DEIR page 4.12-34, the DEIR assumes a worst-case scenario of 100 roundtrips (200 truck trips) per day. However, an average of 50 roundtrips (100 truck trips) per day is anticipated. (DEIR, p. 3-28.)

Response to Comment Ind 16-5
The commenter resides near the project site and is concerned about the potential impacts to the community. The comment is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 16-6
The commenter lists a number of desirable attributes associated with Nevada County. The comment is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 16-7

The commenter states that the Nevada County Planning Commission is responsible for ensuring the economic viability and environmental longevity of the community. The comment is noted for the decisionmakers. Please see Master Responses 1 and 2.

Response to Comment Ind 16-8

The commenter states that the project would have negative aesthetic impacts and that the DEIR minimizes these impacts. The project's potential impacts to public views are evaluated under Impact 4.1-2, beginning on DEIR page 4.1-14. The potential impacts to public views are not minimized. The DEIR identifies the project's potential impacts and determines that, even with available mitigation, the impact would be significant and unavoidable at multiple public viewpoints.

Response to Comment Ind 16-9

The commenter states that the project would have negative aesthetic impacts and that the DEIR minimizes these impacts. The project's potential impacts to public views are evaluated under Impact 4.1-2, beginning on DEIR page 4.1-14. The potential impacts to public views are not minimized. The DEIR identifies the project's potential impacts and determines that, even with available mitigation, the impact would be significant and unavoidable at multiple public viewpoints.

Response to Comment Ind 16-10

The commenter states that the project would have negative aesthetic impacts and that the DEIR minimizes these impacts. The commenter also states that the aesthetics of the project would impact outdoor businesses. The project's potential impacts to public views are evaluated under Impact 4.1-2, beginning on DEIR page 4.1-14. The potential impacts to public views are not minimized. The DEIR identifies the project's potential impacts and determines that, even with available mitigation, the impact would be significant and unavoidable at multiple public viewpoints. Evaluation of impacts to business and the local economy is not required by CEQA. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-11

The commenter states that the Nevada County's air quality is already poor and afford to be degraded further. The commenter does not state how the DEIR is inadequate in addressing air quality impacts. The project's potential impacts to air quality are evaluated in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). As demonstrated throughout the Chapter, with mitigation, the project's air quality impacts would be less than significant.

Response to Comment Ind 16-12

The commenter describes the project's potential adverse impacts to the local economy that could occur. The comment is noted for the decisionmakers. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-13

The commenter states that the project would require an excessive amount of water and potentially impact thousands of wells. As demonstrated in Chapter 4.11 of the DEIR (Public Services and Utilities), there would be sufficient water supplies to serve both the project and other future planned development in the service area under normal and dry year conditions (see Impact 4.11-7 beginning on DEIR page 4.11-35). As stated on DEIR page 4.11-43, "sufficient water supplies would be available to serve the project, as well as existing and reasonably foreseeable future development during normal, dry, and multiple dry years." With regard to potential impacts to

groundwater supplies and local wells, the commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. With regard to potential impacts to water quality, the commenter is referred to Master Response 36 - Discharges to South Fork Wolf Creek.

Response to Comment Ind 16-14

The commenter states that the DEIR underestimates the number of groundwater wells the project could impact. The commenter also states that the dewatering of the mine would discharge pollutants to surface water. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 36 - Discharges to South Fork Wolf Creek.

Response to Comment Ind 16-15

The commenter states there should be bi-annual well testing throughout the County and that that the County should pay for any impacted well to switch to NID service. Mitigation Measure 4.8-2(a) in Chapter 4.8 (Hydrology and Water Quality) requires the Project Applicant to implement a Groundwater Monitoring Plan (GMP) to monitor water levels in the project area and to perform a projected water-level impact assessment for individual domestic wells. Mitigation Measure 4.8-2(b) further requires the Project Applicant to provide a comparable alternative water supply to replace any wells that are significantly impacted by project operations. Regarding the bi-annual testing, the commenter is referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 16-16

The commenter states that the project's truck traffic will impede an evacuation during an emergency. The project's potential impacts to emergency response and evacuation are evaluated under Impact 4.7-4 beginning on DEIR page 4.7-37. Please also see Master Response 5 – Evacuation Zones.

Response to Comment Ind 16-17

The commenter states that the project's truck traffic will impede emergency vehicles travelling to the hospital. The commenter is referred to Master Response 5.

Response to Comment Ind 16-18

The commenter states that the DEIR directive to minimize truck idling is permissive and offers the community no assurances as to air quality and noise impacts. Regarding the air quality impacts, the California Air Resources Board has adopted rules limiting idling of both on-road and off-road heavy-duty diesel trucks to less than five minutes. (DEIR, p. 4.3-25–30.) This is an existing regulation that is enforced by the Northern Sierra Air Quality Management District (NSAQMD) and through the inclusion of required technologies in newer equipment. Regarding noise impacts, the DEIR evaluated the noise impacts from diesel trucks and found those impacts less than significant after mitigation. (DEIR 4.10-31.)

Response to Comment Ind 16-19

The commenter states that the population of the community has grown in recent decades. The comment is noted. Please see Master Response 1.

Response to Comment Ind 16-20

The commenter states that the location of the project near parcels zoned for residential is inappropriate and that the project will have negative noise impacts. The commenter also states the project will negatively impact property values. The project site is zoned for industrial uses. Regarding property values, the commenter is referred to Master Response 2 - Social and Economic Issues. The project's potential impacts related to noise are evaluated in Chapter 4.7 (Noise and Vibration).

Response to Comment Ind 16-21

The commenter states that the project will cause negative economic impacts to the community. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-22

The commenter states that the project will cause negative economic impacts to the community. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-23

The commenter states the DEIR should assess the potential loss in jobs and property values to the community. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-24

The commenter raises numerous potential environmental impacts but does not state how the DEIR is inadequate in addressing these impacts. Dust and air pollution concerns are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). A Health Risk Assessment was prepared for the project as described on DEIR page 4.3-61. The Project Applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR) which is designed to exclude asbestos containing material from the engineered fill produced by the project and from rock mined and processed. (DEIR, Appx. E.2.) All mined materials will be tested to ensure asbestos content does not exceed applicable standards and all engineered fill used for surfacing applications would have no detectable asbestos. Noise pollution is addressed in DEIR Chapter 4.10 (Noise and Vibration). Increased community medical costs are not an issue required by CEQA for evaluation in the DEIR. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 16-25

The commenter states that the Project Applicant should conduct bi-annual testing of groundwater wells and should commit to covering the cost of switching to NID service. Groundwater quality is already required in the well monitoring plan from water monitoring wells which are representative of the surrounding domestic water wells. (DEIR, Appx. K.8.) Required well monitoring and mitigation already places the burden of proof on the applicant. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells, inclusive of water level and water quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and

shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Additionally, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 16-26

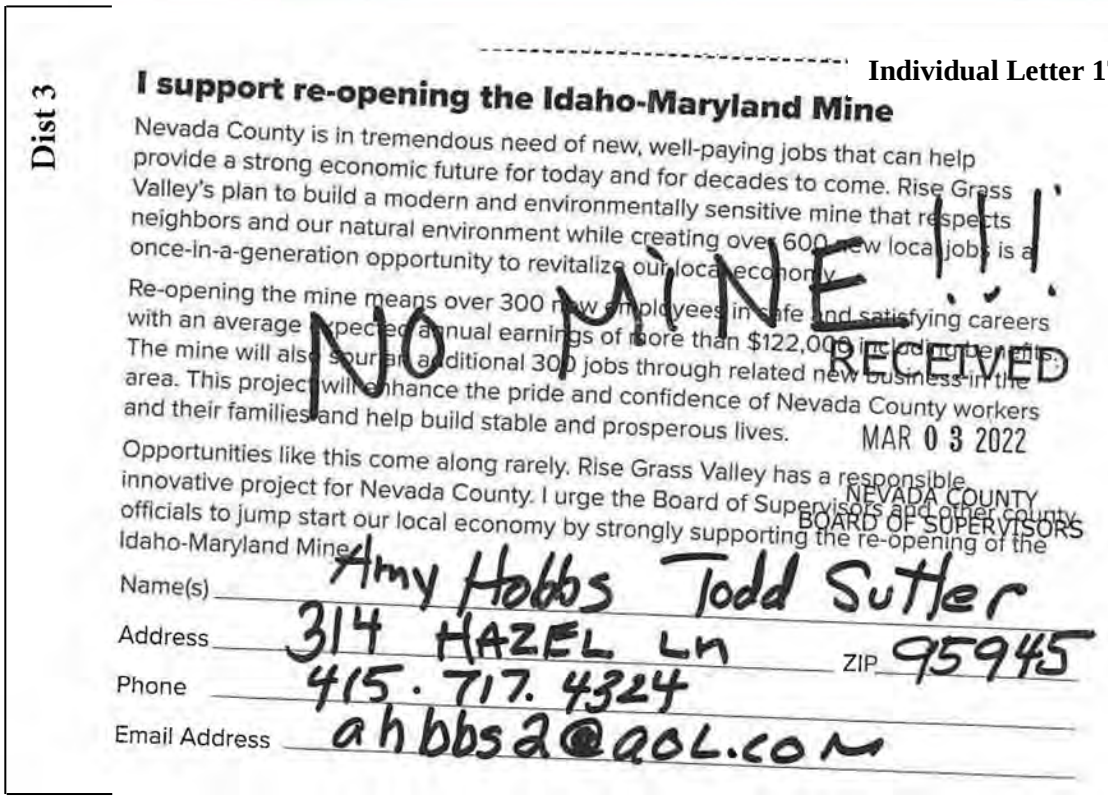
The commenter states that the Project Applicant should be required to have insurance for any seismic impacts associated with the project. The project's mining activities would not induce seismic activity. The DEIR analyzed the project's ability to rupture an earthquake fault or cause a seismic-related ground failure and found the impact less than significant after mitigation. The commenter is referred to the NV5 memo attached to the Final EIR as Appendix P.

Response to Comment Ind 16-27

The commenter reiterates her concerns with various potential project impacts and urges the County to reject the project. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1. Each of the environmental concerns listed in the comment was evaluated in the DEIR in the appropriate technical section.

Individual Letter 17

Ind 17-1



Dist 3

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO MINE!!!

RECEIVED
MAR 03 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) Amy Hobbs Todd Sutter

Address 314 HAZEL LN ZIP 95945

Phone 415.717.4324

Email Address ahbbs2@aol.com

INDIVIDUAL LETTER 17: AMY HOBBS

Response to Comment Ind 17-1

Please see Master Response 1.

Individual Letter 18

From: Andrea Berry <andreaddailey@gmail.com>
Sent: Sunday, April 3, 2022 8:13 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine Opposition

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To Whom It May Concern,

Ind 18-1 As a homeowner adjacent to the Idaho Maryland Mine property, I am extremely concerned with the prospect of the mine reopening. Our family returned to Grass Valley after jobs and military deployments pulled us out of the area for a decade. We recently were able to fulfill our dream of buying a home in Grass Valley again and our three children are enrolled in schools and we are all happily readjusted. If the mine is approved, we will most certainly be forced to sell our dream home and move our family away from this appalling development.

Ind 18-2 While I have multiple concerns with this project, the impact of noise disturbance will be the most constant nuisance. Our home is adjacent to the south end of the Brunswick site and as the mine property is cleared for development and mining uses, the noise will travel even more efficiently. In the Summary of Impacts and Mitigation Efforts, the noise levels are deemed "significant and unavoidable". While "significant" noise disturbances alone should deem the project unfit for this property, the impact of noise is grossly underestimated as there has not been any clearing of the property at this point. Once the property is forested and cleared for development, noise will travel even more efficiently. Mitigation efforts should include reasonable hours of operation (i.e. not 24/7) as well as a 12-foot sound deadening fence along the property.

Ind 18-3 In addition to noise disturbances, I am concerned with the impact on traffic. The discussion of traffic impacts on DEIR page 102 is inadequate because while the responsiblity is certainly on Rise GV to pay toward road improvements necessary to safely facilitate the traffic increase, it is unclear what those "improvements" may include, and only a 14.9% contribution of the project seems underrepresented. The mitigation efforts should include a detailed road improvement plan of Brunswick Rd to accommodate the influx of heavy trucks, including and not limited to the widening Brunswick Rd. The DEIR does not outline how CalTrans reports only 14.9% accountability for Rise GV but the calculations for this should be shared with the public, and potentially re-evaluated insuring the calculation is not only considering the per vehicle usage but also per vehicle weight (i.e. road deterioration).

Ind 18-4 Nevada County, along with much of California, has a rich history of mining. Let's keep it in our history and attract other, less environmentally harmful, and economically progressive businesses to redefine our community. A destructive mine in the midst of residential communities is harmful on various fronts and puts our community in jeopardy of losing significant revenue from home values dropping, tourism less attractive due to a loud mine operating 24/7, and an already-troubled air quality subject to even more stress. This is not an appropriate project for our community and I trust the Commission will accurately represent its constituents and not allow this project to move forward.

Regards,

Andrea Berry

1

12702 Beaver Dr, Grass Valley, CA 95945
andreaddailey@gmail.com

INDIVIDUAL LETTER 18: ANDREA BERRY

Response to Comment Ind 18-1

The commenter is opposed to the project. The commenter's opposition is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 18-2

The commenter states that clearing of the project site for construction would result in greater noise impacts on adjacent properties due to the removal of vegetation which would have served to attenuate noise generated at the project site. The noise modeling conducted for the project considered the effects of ground cover on noise attenuation. The DEIR states that "it was assumed that the project site would essentially consist of acoustically hard surfaces with little sound absorption." (DEIR, p. 4.10-24.) In other words, the DEIR noise analysis assumes a worst-case scenario of the entire disturbed area of project site being cleared of vegetation. The commenter states that different hours of operation should be considered. A reduced hours alternative has already been considered in the DEIR and dismissed from further analysis. (DEIR, p. 6-13.)

As discussed in Chapter 4.10 (Noise and Vibration) of the DEIR, the noise impacts from the project, except for the construction of the water pipe along East Bennett Road, would be less than significant after mitigation. The construction of a 12-foot-high sound wall along the property boundary is not included in mitigation measures and is not required to lessen noise impacts below a level of significance.

Response to Comment Ind 18-3

The commenter states that the DEIR is inadequate with regard to its mitigation measures for any damage to roadways caused by project traffic. The commenter is referred to page 207 of DEIR Appendix O (Traffic Impact Analysis), which details the recommended roadway and signal improvements for each scenario considered in the traffic study. Most of these improvements were previously identified in local and regional transportation plans and the project would contribute to the existing or projected need for the improvements.

The commenter suggests widening Brunswick Road but does not explain how that would lessen the impact of truck traffic on Brunswick Road. No such improvement is required based on the analysis in Section 4.12 (Transportation) of the DEIR.

The project's fair share contribution to the costs of roadway improvements was calculated by KD Anderson & Associates using Caltrans' standard methodology. The commenter is referred to DEIR Appendix O (Traffic Impact Analysis), Technical LOS Appendix IX, which provides the project's fair share cost calculations for each improvement. The fair share calculation is for intersection improvements to reduce traffic delay. The vehicle weight is not relevant to this calculation. In regard to road maintenance, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between Project Driveway and Brunswick Road.

Response to Comment Ind 18-4

The commenter urges the County not to approve the project. The comment is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 19

From: Andrew Ribotto <ribotto@ribotto.com>
Sent: Monday, April 4, 2022 12:41 PM
To: Idaho MMEIR
Subject: no on idaho / maryland mine -

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Greetings,

Andrew Ribotto here --

Ind 19-1 I own property here between auburn and GV in nevada county and I find it shocking that we would even consider squandering any water resources in our county whatsoever during a 1000 year drought and ever increasing wildfire risk. Its basically a guarantee that any EIR provided by Rise Gold is going to be a rosy painted "best case scenario" and from what I've gathered, their track record has plenty of worse case scenarios.

I can't even imagine how annoying it would be for residents in that neighborhood to have to deal with this and not really clear how anyone could claim to be representing their community's interest by having this non-local company come in and exploit this beautiful town.

please PLEASE NO on the idaho maryland mine.

thank you,
-Ribotto

1

INDIVIDUAL LETTER 19: ANDREW RIBOTTO

Response to Comment Ind 19-1

Please see Master Responses 1 and 3. Please note that the DEIR was not provided by the applicant and, in fact, was prepared under the direction of the County.

Individual Letter 20

From: andrew wilson <ahwilson48@gmail.com>
Sent: Monday, April 4, 2022 4:26 PM
To: Idaho MMEIR
Subject: Rise Gold EIR

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Dear Mr. Kelley;

Please consider the following comments on the Rise Gold EIR:

Ind 20-1 It is painfully obvious that the EIR for the proposed Rise Gold re-opening of the Idaho-Maryland mine is fatally flawed in numerous respect s which have been pointed out repeatedly by many comments I have read, and I am sure by many which I have not. The takeaway is the EIR failed to use the approach which would adequately address the many actual and potential harmful effects of the proposed project. Much of the data on which the EIR is based was compiled from secondary sources without identifying whether the data is reliable. Resulting noise and air pollution effects were minimized as was the potential effect on wells in the area and the effect of the discharges of water pumped from the mine into Wolf Creek. Based on mine developments in other areas, it seems very likely that properties in the Nevada City/Grass Valley area would experience a significant decline. Some areas have seen declines in excess of 20% which would result, if the properties were reassessed as they should, in a concomitant decline in property tax revenue.

Ind 20-2 The following specific deficiencies have been pointed out by CEA and its consultants, any one of which should require that the EIR be amended to address them: (i) The EIR essentially ignores the fact that the mine site has not been cleaned us as required and therefore does not address what steps would need to be taken to do so; (ii) the EIR uses

Ind 20-3 meteorological data from Blue Canyon, many miles away from the cite, rendering conclusions from that data

Ind 20-4 insupportable; (iii) the EIR relied on an outside report for data on the drill core rock which was relied for the EIR's conclusion concerning impact on water quality – one of the most serious and long lasting consequences of the project; (iv) water quality samples were not taken from the Wolf Creek area, which is the most appropriate location.

Ind 20-5 The EIR dispenses with the risks it identifies by asserting that they can be addressed, mitigated and/or ameliorated. However, no estimate of the costs of this are given, which is extremely troubling since Rise Gold is severely undercapitalized and could not realistically expect to be able to do the work necessary to-open the mine much less to perform the remediation efforts described in the EIR.

Ind 20-6 It is painfully obvious that the EIR for the proposed Rise Gold re-opening of the Idaho-Maryland mine is fatally flawed in numerous respect s which have been pointed out repeatedly by many comments I have read, and I am sure by many which I have not. The takeaway is the EIR failed to use the approach which would adequately address the many actual and potential harmful effects of the proposed project. Much of the data on which the EIR is based was compiled from secondary sources without identifying whether the data is reliable. Resulting noise and air pollution effects were minimized as was the potential effect on wells in the area and the effect of the discharges of water pumped from the mine into Wolf Creek. Based on mine developments in other areas, it seems very likely that properties in the Nevada City/Grass Valley area would experience a significant decline. Some areas have seen declines in excess of 20% which would result, if the properties were reassessed as they should, in a concomitant decline in property tax revenue.

1

Ind 20-7

The following specific deficiencies have been pointed out by CEA and its consultants, any one of which should require that the EIR be amended to address them: (i) The EIR essentially ignores the fact that the mine site has not been cleaned us as required and therefore does not address what steps would need to be taken to do so; (ii) the EIR uses meteorological data from Blue Canyon, many miles away from the cite, rendering conclusions from that data insupportable; (iii) the EIR relied on an outside report for data on the drill core rock which was relied for the EIR's conclusion concerning impact on water quality – one of the most serious and long lasting consequences of the project, (iv) water quality samples were not taken from the Wolf Creek area, which is the most appropriate location.

The EIR dispenses with the risks it identifies by asserting that they can be addressed, mitigated and/or ameliorated. However, no estimate of the costs of this are given, which is extremely troubling since Rise Gold is severely undercapitalized and could not realistically expect to be able to do the work necessary to-open the mine, much less to perform the remediation efforts described in the EIR.

Ind 20-8

This raises what is perhaps the most troubling aspect of the project. One which the EIR does not, and possibly could not address. That is the track record of Rise Gold and its CEO. That track record alone should disqualify Rise Gold from ever getting permission for any construction project, much less the reopening of a gold mine with all of the potential harmful effects which it presents. Rise Gold's previous project resulted in numerous unlawful and hazardous conditions which were left unremedied when it went into bankruptcy. Rise Gold's CEO was indicted and criminally convicted for this and, although the conviction was overturned, the case will be retried. Whether or not there is ultimately a conviction for Rise Gold's violation of laws designed to prevent environmental destruction, Rise's track record makes clear that there is serious risk that it will not, or cannot, perform in accordance with the laws and regulations designed to protect the environment. It would be foolish in the extreme to allow a company and CEO with this track record to proceed with this project.

ne which the EIR does not, and possibly could not address. That is the track record of Rise Gold and its CEO. That track record alone should disqualify Rise Gold from ever getting permission for any construction project, much less the reopening of a gold mine with all of the potential harmful effects which it presents. Rise Gold's previous project resulted in numerous unlawful and hazardous conditions which were left unremedied when it went into bankruptcy. Rise Gold's CEO was indicted and criminally convicted for this and, although the conviction was overturned, the case will be retried. Whether or not there is ultimately a conviction for Rise Gold's violation of laws designed to prevent environmental destruction, Rise's track record makes clear that there is serious risk that it will not, or cannot, perform in accordance with the laws and regulations designed to protect the environment. It would be foolish in the extreme to allow a company and CEO with this track record to proceed with this project.

Sincerely,

Andrew Wilson,

12881 Low Hills Rd
Nevada City, CA 95959
phone: (530) 470-8888
cell: (530) 913-6401
email: ahwilson48@gmail.com

INDIVIDUAL LETTER 20: ANDREW WILSON

Response to Comment Ind 20-1
The commenter states that the DEIR is flawed but provides no specifics or evidence to support this statement. The commenter also states that hydrology, air quality, and noise impacts were minimized but provides no additional information. Noise is analyzed in Chapter 4.10 of the DEIR, air quality is analyzed in Chapter 4.3 of the DEIR, and hydrology and water quality are analyzed in Chapter 4.8 of the DEIR. Responses to detailed comments are provided below. Lastly, the commenter states that the project will result in reduced property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2- Social and Economic Issues.

Response to Comment Ind 20-2
The commenter states that the DEIR "ignores the fact that the mine site has not been cleaned up" which is presumably a reference to the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 20-3
The commenter states that the meteorological data is not representative of the project location. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Ind 20-4
The commenter states that the DEIR relied on an outside report for data on the "drill core rock." The commenter is referred to Master Response 8 - Mine Waste Characterization. The commenter also states that water samples were not taken from the Wolf Creek area. Water quality samples were taken in Wolf Creek. (DEIR, p. 4.8-23.)

Response to Comment Ind 20-5
The commenter is concerned about the Project Applicant's financial capability. The commenter is referred to Master Response 3 - Operator Responsibility, and Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 20-6
Please see Response to Comment Ind 20-1.

Response to Comment Ind 20-7
The commenter reiterates concerns addressed in responses above. Regarding the cleanup of the Centennial Industrial Site, the commenter is referred to Response to Comment Ind 20-2. Regarding the air quality data, the commenter is referred to Response to Comment Ind 20-3. Regarding the sampling cores, the commenter is referred to Response to Comment Ind 20-4. Regarding water quality samples from Wolf Creek, the commenter is referred to Response to Comment Ind 20-4. Regarding the Project Applicant's financial condition, the commenter is referred to Response to Comment Ind 20-5.

Response to Comment Ind 20-8
The commenter opposes the project and questions the Project Applicant's reputation. The commenter's opposition to the project is noted for the decisionmakers and is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter is also referred to Master Response 3 – Operator Responsibility.

Individual Letter 21

From: Angie Pereira <mapereira@comcast.net>
Sent: Sunday, April 3, 2022 11:28 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project Draft EOR (SCH # 2020070378

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April 3, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as the damage the character and vitality of the community.

Significant and Unavoidable Impacts

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

• Aesthetics

Ind 21-1

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

• Noise.

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

• Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way). Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

Ind 21-2

Preference of the No-Build Alternative

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensure that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

1

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.
- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not have a substantial adverse effect to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- Geology/Soils
  - The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.
- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
  - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project includes mitigation to offset impacts to wells (i.e., provision of potable water

service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.

- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.
- Tribal Cultural Resources
  - The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

Beyond the Scope of CEQA

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

Ind 21-3

The Draft EIR is clinical and abstract in its review. In reality, this project will directly negatively impact in great and many ways people that I know and care for, and will impact our whole community in our daily (and nightly) lives. It does not appear to me that the benefit outweighs the burden. We appreciate our quality of life here in Western Nevada County and that is worth more than the financial and economic assets brought to the area in this project. It appears that long-term thinking is absent in planning decisions to the detriment of our community experience. You have a responsibility to the people who reside in Nevada County, and to take care of their needs and expectations, not enter into a situation with so many negative attributes.

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me at mapereira@comcast.net

Sincerely,

Angie Pereira

INDIVIDUAL LETTER 21: ANGIE PEREIRA

Response to Comment Ind 21-1

The commenter provides a summary of the project and lists the impacts that the DEIR determined to be significant and unavoidable. The comments are noted for the decisionmakers.

Response to Comment Ind 21-2

The commenter prefers that the County selects the "No Build" Alternative to the project and provides a variety of reasons as to why the No Build Alternative is environmentally superior. The comments are noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 21-3

The commenter states that economic and social impacts do not fall within the scope of CEQA. The commenter also opposes the project and urges the County not to approve it. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2-Social and Economic Issues.

Individual Letter 22

From: Ani Kington <anikington@gmail.com>
Sent: Monday, April 4, 2022 1:59 PM
To: Idaho MMEIR
Subject: DEIR

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Dear Mr. Kelley:

I have lived in Nevada County for 5.5 years and currently live and work in Grass Valley. I am writing to express my concerns about the shortcomings of the DEIR. Particulate-ly (see what I did there?) with regards to air quality. Grass Valley already gets an F on air quality from the 2020 "State of the Air Report" from the American Lung Association, and we all know how taxing fire season is with the smoke. The absolute last thing we need is something else to negatively impact our air quality! Especially when one of the best things about living here is enjoying the outdoors. Experts working with the CEA Foundation have determined there are significant errors and omissions in the DEIR with regards to air pollution. The affects of diesel exhaust and asbestos (to name a few) are understated and not thoroughly examined.

Ind 22-1

There are clearly lots of issues with the DEIR, and this email represents about 1% of my concerns surrounding the reopening of the Idaho-Maryland mine.

Thanks for reading,
Ani Kington
Grass Valley resident

1

INDIVIDUAL LETTER 22: ANI KINGTON

Response to Comment Ind 22-1

Please see Master Response 1. With regard to air quality concerns, please see Master Responses 18, 19, 22, and 23.

Individual Letter 23

From: Anita Pearson
To: BOS Public Comment
Subject: Mine Comments
Date: Tuesday, February 22, 2022 2:50:40 PM

Dist 4

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My name is Anita Lincoln Pearson. I am vehemently opposed to reopening the mine in Nevada County. I was born and raised in Nevada County. I am a home owner, tax payer and currently work and reside in Nevada County. I am an active member of the California Native Plant Society, a member of the local chapter of the National Audubon Society and a member of the Arbor Day Foundation. I am a steward for the land.

I oppose a small organization profiting off of the destruction of our healthy ecology by mining. Our local economy depends on our water and the natural resources. Our community's economy depends on the beautiful setting, tourism and peace. Mining is a backward quick profit for a conglomerate corporation that will destroy our land and water then leave us with the toxic waste and run.

Ind 23-1

Look at the Malakoff Diggins as an example. The mineral composition of the mined area has rendered so much land unusable and has decimated the mineral composition of the soil. it can no longer sustain a healthy ecology. And it's been over a hundred years since that region was destroyed by hydro mining.

We need to stop going backwards and think of the future. We are a sustainable community and I want to keep it that way. We already learned from our past mistakes of unsustainable mining practices. There is zero benefit to our community to provide gold for the pocket of one wealthy individual at the cost of our Northern California water, air and landscape. It's criminal. We can invest in other sustainable ways to make money while preserving our environment for our children and our grandchildren.

Thank you.

Sent from my iPhone

INDIVIDUAL LETTER 23: ANITA PEARSON

Response to Comment Ind 23-1

Please see Master Responses 1 and 2.

Individual Letter 24

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Anita J. Wald-Tuttle

Address: 6 Rockwood Drive, Grass Valley, 95945

Organization (if applicable): Mine Watchers

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

(See attached copy)

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Reopening of the Idaho-Maryland Mine by Rise Gold Corporation

Anita Wald-Tuttle <anitaw1t3@gmail.com> Thu, Mar 24, 2022 at 12:27 AM
Draft

Planning Commission ~~Representatives~~, and Staff

Dear ~~Supervisors~~,

Ind 24-1 I am opposed to the reopening of the Idaho-Maryland Mine. I have reviewed articles in the local newspaper and have also checked those sections of the Environmental Impact Report regarding special concerns of mine. When I came to Grass Valley 33 years ago it was quiet and peaceful but had the desire to change its image in order to attract tourists and grow as a destination for those wanting a restful place to enjoy ~~all facets~~ of the arts. It has been quite successful, but now we face a problem.

Ind 24-2 In perusing the immense EIR I find very little addressing the problems of Noise and Vibration which Rise Gold has labeled as Significant and Unavoidable. They project that there would be a substantial temporary or periodic increase in ambient noise levels in the project vicinity and offer no ideas for mitigation.
In regard to Vibration they propose a ground vibration monitoring program should be implemented and additional protective measures be available.
The EIR DOES require mitigation in order to ensure that the aforementioned impacts ARE reduced to a LESS-THAN-SIGNIFICANT level.
I am hopeful that the Board of Supervisors will carefully question this portion of the EIR. Our concerts, plays, and other programs depend on quiet observance for happy audiences!

Ind 24-3 Portions of the EIR are directly contrary to the Standard of Review stated in County Policy 17.14 and Policy 17.24

Sincerely,
Anita Wald-Tuttle
6 Rockwood Drive, Grass Valley, 95945
530-277-6195
anitaw1t3@gmail.com

INDIVIDUAL LETTER 24: ANITA WALD-TUTTLE

Response to Comment Ind 24-1
Please see Master Response 1.

Response to Comment Ind 24-2
Regarding concerns related to noise and vibration please refer to Chapter 4.10, Noise and Vibration, of the DEIR. As noted therein, the DEIR includes Mitigation Measure 4.10-1, which would reduce the temporary construction-related noise impact associated with installation of the potable water pipeline. However, because the noise reductions that would be achieved by the measures cannot be definitively determined to confirm that noise levels would be reduced to below a level of significance, the impact was considered significant and unavoidable.

According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact. Therefore, impacts related to noise and vibration were adequately addressed in the DEIR.

Response to Comment Ind 24-3
It is unclear what Standard of Review the commenter is referring to. Policy 17.14 of the Nevada County General Plan states that already existing development as well as undeveloped private lands, shall be protected from adverse environmental effects caused by mining through enforced use permit conditions and mitigations measures, or denial of the projects. Further, Policy 17.24 of the Nevada County General Plan states that subsurface mining shall be conditionally permitted throughout the County, and shall be allowed only after impacts on the environment and affected surface land uses have been adequately reviewed and found to be in compliance with CEQA.

As discussed within the Impacts and Mitigation Measures section of each technical chapter included in the DEIR (Chapter 4.1 through 4.13), the effects of the project were evaluated based on the standards of significance set forth in Appendix G of the CEQA Guidelines. As such, the DEIR is consistent with the requirements of CEQA, and impacts were adequately addressed within the DEIR.

Individual Letter 25

Senior Planner Matt Kelley
Director of Planning Brian Foss
Principal Planner Tyler Barrington

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Sat, Apr 2, 2022 at 12:23 AM

Dear Supervisors,

Ind 25-1 I am opposed to the reopening of the Idaho-Maryland Mine. I have reviewed articles in the local newspaper and have also checked those sections of the Environmental Impact Report regarding special concerns of mine. When I came to Grass Valley 33 years ago it was quiet and peaceful but had the desire to change its image in order to attract tourists and grow as a destination for those wanting a restful place to enjoy all facets of the arts. It has been quite successful, but now we face a problem.

In perusing the immense EIR I find very little addressing the problems of Noise and Vibration which Rise Gold has labeled as Significant and Unavoidable. They project that there would be a substantial temporary or periodic increase in ambient noise levels in the project vicinity and offer no ideas for mitigation.

Ind 25-2 In regard to Vibration they propose a ground vibration monitoring program should be implemented and additional protective measures be available. The EIR DOES require mitigation in order to ensure that the aforementioned impacts ARE reduced to a LESS-THAN-SIGNIFICANT level.

I am hopeful that the Board of Supervisors will carefully question this portion of the EIR. Our concerts, plays, and other programs depend on quiet observance for happy audiences!

Ind 25-3 Portions of the EIR are directly contrary to the Standard of Review stated in Policy 17.14 and Policy 17.24

Sincerely,
Anita Wald-Tuttle
6 Rockwood Drive, Grass Valley, 95945
530-277-6195
anitaw1t3@gmail.com
Anita Wald-Tuttle

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 25: ANITA WALD-TUTTLE

Response to Comment Ind 25-1
Please see Master Response 1.

Response to Comment Ind 25-2
Regarding concerns related to noise and vibration please refer to Chapter 4.10, Noise and Vibration, of the DEIR. As noted therein, the DEIR includes Mitigation Measure 4.10-1, which would reduce the temporary construction-related noise impact associated with installation of the potable water pipeline. However, because the noise reductions that would be achieved by the measures cannot be definitively determined to confirm that noise levels would be reduced to below a level of significance, the impact was considered significant and unavoidable.

According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact. Therefore, impacts related to noise and vibration were adequately addressed in the DEIR.

Response to Comment Ind 25-3
It is unclear what Standard of Review the commenter is referring to. Policy 17.14 of the Nevada County General Plan states that already existing development as well as undeveloped private lands, shall be protected from adverse environmental effects caused by mining through enforced use permit conditions and mitigations measures, or denial of the projects. Further, Policy 17.24 of the Nevada County General Plan states that subsurface mining shall be conditionally permitted throughout the County, and shall be allowed only after impacts on the environment and affected surface land uses have been adequately reviewed and found to be in compliance with CEQA.

As discussed within the Impacts and Mitigation Measures section of each technical chapter included in the DEIR (Chapter 4.1 through 4.13), the effects of the project were evaluated based on the standards of significance set forth in Appendix G of the CEQA Guidelines. As such, the DEIR is consistent with the requirements of CEQA, and impacts were adequately addressed within the DEIR.

Individual Letter 26



Anita Wald-Tuttle
6 Rockwood Drive
Grass Valley, CA 95945
anitaw1t3@gmail.com
530-277-6195

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us
(530) 265-1423

DEIR Comment: 4.10. Noise and Vibration and Appendix L, Noise and Vibration Analysis

Ind 26-1 In general, the "significant and unavoidable" impacts of noise and vibration cannot be mitigated as reported in the DEIR.

First, though the DEIR claims that noise and vibration would happen mostly during initial construction activities, this interpretation is misleading in my opinion. I addition, my experience with noise is that it can be omnipresent when dealing with a VALLEY which "we are in" (Brunswick Basin and along the SR 49 corridor through Grass Valley City)! Even minor noises tend to be compounded in usual situations like accidents, fire engines, and even minor (so called) vehicle noise like motorcycles.

Ind 26-2 The DEIR overlooks that vibration also has significant impacts in an area like ours which has tourist traffic as its major industry. A visit to downtown Grass Valley reveals that numerous businesses use hangings, shelves, and wall displays to promote their merchandise. Vibration traveling up from underground blasting could create havoc with glass, ceramic, and other breakable products. It might be severe enough to put small businesses "at risk" because of accommodations to avoid breakage and disarray (see the "vibration level" from the DEIR below that I found). We need to keep the charming ambience for our tourists we have worked so hard to create over the years.

Second, The DEIR declares mitigations and specifically provides mitigations for blast vibration. **This is more than inadequate.** It is an insult to all of western Nevada County.

Ind 26-3

> "Once mining operations commence, the project applicant shall hire a blast consultant to assist with the development of a 95 percent confidence level equation for the site-specific ground vibration. The blast consultant would take the data acquired by the seismographs set-up on the mine, run a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain below 0.4 in/s at sensitive receptors.
>
> Results of the Ground Vibration Monitoring Program and the equation for site-specific ground vibration shall be submitted to the Nevada County Planning Department for review." (page 2-97)

1

Monitoring at the several "receptor sites" listed, recording on seismographs the vibration levels, running an equation and submitting results to the County is not a mitigation measure! When an explosion reaches a surface vibration level of almost ½ inch of motion, you have an absolutely unacceptable impact.

DEIR consultants can say that explosive charges will be reduced if the "blast consultant" sees explosions over the level experts decided. Experts have reported that the explosions will occur 7 days a week for 16 hrs. or 24 hrs. per day. Anyone who thinks residents can live with vibration before it is reduced, as implied to be .4 inches per second or above, and as the tunnels proceed under 2,500 acres, should be removed from office or fired.

I appreciate the education and explanation about noise and vibration such as the classic textbook chart on noise measured in decibels from different sources like a shotgun. This is a service to anyone in the community who can read it.

But when the DEIR says "Generation of excessive groundborne vibration or groundborne noise levels" will be avoided, I think this is extremely subjective and must be called inadequate.

Finally, the "Summary of Applicable Vibration Standards" beginning on page 4.10-20 includes a plethora of government and expert information about vibration. What it is missing is the public health impacts of being a "sensitive receptor" of vibration in people's homes in a semi-rural community. The whole treatment vibration and noise is for industrial settings and places next to airports.

Ind 26-4

Sincerely,

Anita Wald-Tuttle

Anita Wald-Tuttle, former Co-Owner of Tanglewood Forest Gallery

P.S. Related sections I am not going to analyze here but are relevant, and if this DEIR is accepted, we can further report on the inadequacy relative to our environment.

Ind 26-5

4.10-8 Groundborne Vibration Impact Criteria for General Assessment, section 4.10-21

4.10-9 Thresholds of Significance for Mine Blasting Vibrations, see 4.10-22

Table: 4.10-26 Ground Vibration Predictions at Downtown Grass Valley 4.10-57

Comments Received on the NOP: Noise and Vibration (4.10)

2

INDIVIDUAL LETTER 26: ANITA WALD-TUTTLE

Response to Comment Ind 26-1
Please see Responses to Comments Ind 26-2 through 26-4, below.

Response to Comment Ind 26-2
As discussed in Chapter 4.10, Noise and Vibration, of the DEIR, a Noise and Vibration Analysis prepared for the proposed project by Bollard Acoustical Consultants (BAC) to assess project-specific noise impacts during both project operations and construction. As discussed in Impact 4.10-3 (see page 4.10-37 of the DEIR), impacts related to several long-term/permanent noise generating activities were assessed. Based on the analysis included therein, which was reliant on the technical study prepared by BAC, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. However, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 was included in the DEIR out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible.

Additionally, a Technical Blasting Report was prepared for the proposed project by Precision Blasting Services to assess potential impacts specifically related to vibration generated by blasting. Underground blasting was assessed on pages 4.10-52 through 4.10-58 of the DEIR. As concluded therein, the proposed project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels. Nonetheless, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required. As such, Mitigation Measure 4.10-4 was included in the DEIR to ensure impacts would be less than significant.

Based on the above, impacts related to noise and blasting were adequately addressed in the DEIR.

Response to Comment Ind 26-3
Where a comment provides the opinion, preference, or observation of the commenter (e.g., opinions on the merits of the project that are unrelated to its environmental impacts), without substantiation, this is acknowledged for the record, and no further response is provided. All comments, whether substantiated by facts or simply reflecting the position of the commenter, will be considered by the County throughout this process. Please refer to Master Response 1.

Response to Comment Ind 26-4
Under CEQA Guidelines Section 15064.7, each lead agency holds the discretion to develop and publish thresholds of significance to be used to determine the significance of environmental effects. The lead agency, which, for this project, is Nevada County, approved all thresholds of significance that were used in the DEIR. The thresholds of significance used in Chapter 4.10, Noise and Vibration, are based on the Nevada County General Plan and guidance from the Federal Interagency Commission on Noise.

Response to Comment Ind 26-5

Please see Master Response 1. The DEIR adequately addressed noise impacts pursuant to all CEQA requirements. The comment has been noted, and forwarded to decision-makers for their consideration.

Individual Letter 27

From: Ann
To: Idaho MMEIR
Subject: Idaho-Maryland Mine. Water-Air Pollution
Date: Friday, April 1, 2022 4:26:54 PM

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Dear Mr. Kelley,

My husband and I recently started a search for a retirement home and Grass Valley seemed ideal—that is when we notice a "No Mine" sign in one of the pictures of homes for sale. Since both of us had spent many years handling environmental toxic tort/waste disposal litigation for a public utility (including numerous depositions of persons with health issues they believed to be caused by the toxic chemicals), we immediately started an inquiry into this mine.

Based on our research, we have decided not to purchase a home in Grass Valley. Benjamin Grossman, the C.E.O. of Rise Gold, is about to be personally criminally prosecuted for egregious flouting of the environmental laws for a mining operation on tribal lands in Canada. It is rare for a corporation to be criminally prosecuted and it is almost unheard of for an executive to be held personally liable. Ben Grossman left tribal lands and waters polluted and when sued, his company declared bankruptcy. Guess who picks up the bill for cleanup when a company goes belly up?

Ind 27-1

Also, it is my understanding that secured financing from banks is not available (a fact that should be verified). So, Rise Gold is underfunded and relying on its ability to raise unsecured funding. This again seems an m.o. for the company. Nevada County is walking a very dangerous line allowing a person with this past record to have such an environmental impact on the area.

Please reconsider.

Ann Finneran

INDIVIDUAL LETTER 27: ANN FINNERAN

Response to Comment Ind 27-1

Please see Master Responses 1 and 3.

Individual Letter 28

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@nevada.ca.us

RECEIVED
FEB 2 8 2022
NEVADA COUNTY
PLANNING

February , 2022

Dear Nevada County Board of Supervisors:

Ind 28-1 I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine. I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 28-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for more than 80 years: 182,500 tons per year! More tailings that polluting big rig diesel trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 28-3 INCREASE GREENHOUSE GAS EMISSIONS
Diesel haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 28-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill Elementary School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will have significant and unavoidable harm even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise Mining Company.

Ind 28-5 Sincerely,

Ann M Torrisi Vogel
19633 Chaparral Cir
Penn Valley CA 95946
Ann M Torrisi Vogel

INDIVIDUAL LETTER 28: ANN VOGEL

Response to Comment Ind 28-1
Please see Master Response 1.

Response to Comment Ind 28-2
Please see Master Response 8.

Response to Comment Ind 28-3
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR.

Response to Comment Ind 28-4
As noted in Chapter 4.12, Transportation, of the DEIR and reiterated by the commenter, the DEIR concluded that a significant and unavoidable impact would occur associated with level of service (LOS) at the SR 174/Brunswick Road intersection (see page 4.12-66). According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact. Moreover, the DEIR addressed impacts regarding whether the project would substantially increase hazards to vehicle safety under Impact 4.12-6, and concluded that with Mitigation Measures 4.12-6(a) through 4.12-6(f), a less-than-significant impact would occur. Therefore, impacts related to intersection delay at the SR 174/Brunswick Road intersection and hazardous roadway conditions were adequately addressed in the DEIR.

Response to Comment Ind 28-5
The comment presents a concluding statement and does not address the adequacy of the DEIR.

Individual Letter 29

March 30, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, California
95959-7902

Re: Idaho Maryland Mine re-opening

Dear Sir,

Ind 29-1 I am embarrassed to tell you that I was one of the respondents to the survey about Rise Grass Valley's reopening of the Idaho Maryland Mine. The questions and the way they were formulated led me to tentatively approve the reopening of the mine. I now wish to rescind my approval, and strongly oppose the reopening of the mine in our community.

There are far too many environmental hazards and few benefits to the land and people who live here to entrust our future to Rise Grass Valley. Please vote "no" on the draft environmental impact report for the Idaho-Maryland Mine project.

Sincerely,

Ann R Wallace

Ann R. Wallace
11276 Via Vista
Nevada City, California
95959-9646

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 29: ANN WALLACE

Response to Comment Ind 29-1

Please see Master Response 1.

Individual Letter 30

To: Nevada County Planning Department
Attn: Matt Kelley, Senior Planner
Email: matt.kelley@co.nevada.ca.us
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

DIER comment email: idaho.mmeir@co.nevada.ca.us

Ind 30-1

As I write, I am hearing a neighbor some distance away chipping storm damaged wood. This irritation is minor, but irritating nevertheless. If I were a bird choosing a nesting site, I would try to find one further from the noise. It the Idaho Maryland Mine becomes a reality, similar and louder noises will become a permanent fixture in the landscape. This will drive birds to search for nesting habitat further from the mine that may already be inhabited; and unable to find a niche, may not breed at all.

There are several CDFW Species of Special Concern that have been documented at the portion of Empire Mine adjacent to the proposed mine sites: Olive-sided Flycatcher, Yellow-breasted Chat, and Yellow Warbler.

The Willow Flycatcher, a California Endangered Species has also been documented at the Empire Mine meadow on Bennet Road.

Ind 30-2

Section 4.10 of the DEIR addressing Noise and Vibration makes no mention of this meadow as part of the Empire Mine Park, which should be addressed. Furthermore, no mention of noise effects on birds and other wildlife is mentioned.

www.livescience.com/4283 cites research finding that noise decreases pairing by almost 15% in a study done at a compressor station generating 90dBA.

CalTrans Technical Guidance for Assessment and Mitigation of the Effects of Traffic Noise and Road Construction Noise on Birds of June 2016 finds that "Any audible component of traffic and construction noise has the potential of causing behavioral or physiological effects independent of any direct effects on the auditory system of TTS (temporary threshold shift), PTS (permanent threshold shift), or masking.

Synthesis of Two Decades of Research Documentating the Effects of Noise on Wildlife in **Biological Reviews** V91 Issue 4 PP982-1005 finds reduced abundance of species in noisy habitats, changes in vigilance and foraging, impacts on individual fitness, and structure of ecological communities. These responses begin at 40dBA, and though the project sites are already subject to intermittent noise levels greater than 40dBA, consideration should should be given to the effect of constant noise on Endangered and Special Concern species.

Ind 30-3

Section 4.10-24, Effects of Ground Cover cites trees and other vegetation in the area that will reduce noise pollution. This does not address the potential loss of this ground cover due to wildfire reduction efforts that are likely in the near future.

Ind 30-4

I am confused about the decoupling of the two sites of the project for the DEIR. It is one project, therefore it should be one DEIR.

Ind 30-5

I would like to see thorough and properly timed surveys of the two sites for endangered species of all kinds.

Ind 30-6

I would like to see realistic projections of how Nevada County is likely to change in the coming decades in terms of human growth and climate change environmental effects, and a reasonable estimate of how the mine activity would affect people and nature.

Thank-you for your consideration of my concerns.

Anna Sullivan
13419 Hillview Rd.
Grass Valley, CA 95945
Email: tmueck@att.net

INDIVIDUAL LETTER 30: ANNA SULLIVAN

Response to Comment Ind 30-1
Noise impacts to wildlife and bird species were analyzed in Impact 4.4-2 and determined to be less than significant.

Please see Impact 4.4-2 and Master Response 37 - Birds and Raptors, regarding impacts to protected bird species.

Response to Comment Ind 30-2
Noise impacts to wildlife and bird species were analyzed in Impact 4.4-2, Chapter 4.4, Biological Resources, of the DEIR and determined to be less than significant.

Regarding Empire Mine State Park (EMSP), Brunswick Industrial Site daytime and nighttime ambient noise level increases do not extend to the EMSP boundary (see DEIR Figure 4.10-7). Engineered fill placement at the Centennial Industrial Site is the closest project activity to the EMSP and could last approximately 6 years. The nearest receptor to the EMSP is number 8 (see DEIR Figure 4.10-3) and the closest noise and vibration measurement locations are numbers 7 and 8 (see Figure 4.10-3). As shown in DEIR, Table 4.10-12, Centennial Industrial Site engineered fill activity does not exceed existing baseline noise levels (see Table 4.10-6). As a result, wildlife species that may use the EMSP should not experience an increase in noise levels and therefore, such impacts would be considered less than significant.

Response to Comment Ind 30-3
As identified in CEQA Guidelines section 15125, the environmental analysis presented in the DEIR should normally compare physical environmental conditions as they exist at the time of the Notice of Preparation. The DEIR analyzed the project's potential impacts consistent with this requirement in addition to reviewing potentially significant cumulative impacts based on known or planned development in the region. Analysis of potential future impacts that may occur in the future because of unknown events (e.g., climate change, megafires, vegetation removal as part of wildfire reduction efforts) is speculative and not required by CEQA. (see CEQA Guidelines Section 15384.)

Response to Comment Ind 30-4
Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Ind 30-5
Please see Master Response 30, Biological Study Technical Adequacy, Master Response 31, Rare Plants, and Master Response 38, Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 30-6
The DEIR presents analyses of the project's impacts in combination with impacts from reasonably foreseeable future growth based on local projections, including combined (i.e., cumulative) impacts on human health and wildlife. Cumulative impact analyses are provided at the end of each technical chapter of the DEIR (Chapters 4.1 through 4.13). Regarding climate change, please see Master Response 16 – Drought and Climate Change.

Individual Letter 31

From: Annie Costa
To: BOS Public Comment
Subject: NO TO MINE!
Date: Sunday, March 20, 2022 1:15:18 PM

Dist 4

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Anne Costa
Penn Valley

Ind 31-1

Do NOT allow this mine to be opened! Financial benefits for the few NEVER OUT WEIGH the damage to so many!!!

We have TANNIN in our well water that we have to treat due to previous mine activities in the area. Tannin residue from wood used in the shafts contaminated our well! The "mines" are MILES away so this is an example of how toxins leach through, downhill!!!

PLEASE DO NOT ALLOW THE MINE TO OPERATE!

If you allow this and well water is decreased or contaminated due to mining activities; or our watershed is impacted, in any way; we all have the right to hold you responsible ... a new well is never guaranteed, so you can imagine the accumulated costs that those who are affected will be incurring; let alone the impact to wild life and geography ... do not risk this!

INDIVIDUAL LETTER 31: ANNE COSTA

Response to Comment Ind 31-1

Please see Master Response 1, 13, and 14.

Individual Letter 32

Anne Lyon
12206 Larkspur Lane
Grass Valley, CA 95949
H: 619-933-1618
mountan6@gmail.com

March 26, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Idaho.MMEIR@co.nevada.ca.us



Re: DEIR Comment: Diesel Emissions

I am a retired teacher and have compromised lung function which has led me to focus on the impact of trucking on the quality of the air we breathe.

Based on expert analysis I have studied, diesel emissions, including both exhaust and particulate matter, or DPM, are not given adequate mitigation in the Rise Gold project DEIR, *Air Quality, Greenhouse Gas Emissions, and Energy* (Chapter 4.3).

The impact of these emissions on public health is serious. Approximately 70% of all airborne cancer risk in California is associated with diesel particulate matter. The mitigation measures are inadequate (see p. 2-14, Executive Summary).

Ind 32-1

Diesel particulate matter has other public health effects as well. Because it is part of PM2.5, DPM contributes to the same non-cancer effects as PM2.5 exposure. These effects include increased ER visits and hospitalizations for exacerbated heart and lung disease, asthma, and premature death. It may affect the immune system, increasing the risk of allergies and susceptibility to infectious diseases. (See Table 4.3-1, and Page 4.3-8).

Diesel emissions will be constant throughout the life of the project starting with the remedial action on the Centennial site, followed by the construction phase of the Brunswick site, then delivery and placement of engineered fill on the Centennial site, and ongoing operations at Brunswick site.

This project will require the use of many heavy-duty diesel engine equipment: 20-ton haul trucks, bulldozers, graders, compactors and generators. Additional diesel trucks will be used for earth moving and the delivery and dispersal of materials such as waste rock, gold concentrate and aggregate. In addition, diesel trucks will be hauling explosives, water, diesel fuel, and cement.

1

32-2 The DEIR states that all diesel equipment "owned" by the mine would be equipped with Tier 4 Final engines, which is the current emissions standard for new trucks, requiring engine manufacturers to reduce particulate matter and oxides of nitrogen (NOx) by 50-96% as compared to Tier 3 engines. Yet if you look closely at the plans, you can easily see there are several loopholes. For instance, another section of the report states that "If these engines are not 'commercially available', then they will use CARB certified Tier 3 engines with the most effective Diesel Emission Control Strategies available for the engine type. "Commercially available" will take into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project site. What isn't covered is the question about what the "Tier" status will be required for leased equipment and outside vendors. These trucks will travel the same roads as our residents and school buses. They'll be bringing explosives, fuel oil and cement to the mine. There are no guarantees that Tier 4 engines will be used exclusively.

32-3 The DEIR must include a commitment to mitigate these emissions before they are in the environment and the human body.

Sincerely,

Anne Lyon

Anne Lyon

INDIVIDUAL LETTER 32: ANNE LYON

Response to Comment Ind 32-1

The commenter states that diesel emissions are not given adequate mitigation in the DEIR but provides no evidence or specific reason why mitigation measures in the DEIR are not adequate.

Diesel emissions from offroad and on-road vehicles are analyzed in Chapter 4.3 of the DEIR and are determined to be less than significant after mitigation. Please see Chapter 4.3 and Appendix E.1 of the DEIR, and Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 32-2

Tier 4 engine standards are applicable only to off-road equipment. On-road trucks are subject to various diesel risk reduction regulations as discussed on pages 4.3-23 and 4.3-24 of the DEIR.

The commenter questions how the applicant will ensure the use of Tier 4 equipment. The project analysis incorporates applicant proposed measures (APMs) that serve to reduce project emissions of criteria air pollutants and toxic air contaminants, including APM-AQ-1 that states "all off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines" (DEIR page 4.3-65). APMs are mandatory conditions of approval and are enforceable by the County. Please see Master Response 3 – Operator Responsibility.

With regard to construction contractors, Mitigation Measure 4-3-1(b) requires a Construction Exhaust Emissions Minimization Plan and the use of Tier 4 Final engines or alternative sources of power. Tier 4 Final engines are commercially available now, so these would be used. The mitigated emissions presented in the Air Quality Analysis of the DEIR reflect the lower emissions that would be achieved by this mitigation measure.

Mitigation Measure 4-3-1(b), bullet point 2a, page 4.3-77 of the DEIR, has been modified in the Final EIR by striking out (deletion) "taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites", as follows:

4.3-1(b) ***Construction Exhaust Emissions Minimization Plan.***
Prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The Construction Exhaust Emissions Minimization Plan shall detail project compliance with the following requirements:

- *Where access to alternative sources of power and alternative-fueled equipment are available, portable diesel engines shall be prohibited.*
- *All diesel-powered equipment with engines equal to or greater than 50 horsepower (hp) shall be powered by California Air Resources Board (CARB) certified Tier 4 Final engines. If 50 hp or greater engines that comply with Tier 4 Final emissions standards are not commercially available, then the Project Applicant shall ensure that all diesel-powered equipment equal to or greater than 25 hp shall have at least CARB-certified Tier 3 engines with the most effective Verified Diesel Emission Control Strategies available for the engine type, such as Level 3 Diesel Particulate Filters (Tier 4 engines automatically meet this requirement).*

a. *For purposes of this mitigation measure, "commercially available" shall mean the availability of the Tier 4 Final equipment~~, taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites~~.*

b. *The Project Applicant shall maintain and submit records to Nevada County concerning its efforts to comply with this requirement.*

The above change is for clarification purposes and does not alter the conclusions of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 32-3

Mitigation Measures for emissions are required in Chapter 4.3 of the DEIR.

Individual Letter 33

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Anne + Ken Merdinger

Address: 323 Alexander Street Nevada City, CA 95959

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 33-1 * We believe the Governor should put a Moratorium on this project due to the water shortage.

* This project should be denied for a great many reasons: ① Rise Gold has used deceptive tactics in their attempts to generate support.
② The activities involved w/ the mine WILL/WOULD adversely affect the lives of community members and discourage tourism.

Ind 33-2 ③ It is insanity to keep this issue viable!!!

Absolutely Opposed - along with EVERYBODY I know.

Stop the Madness!

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 33: ANNE AND KEN MERDINGER

Response to Comment Ind 33-1
Please see Master Response 1 and 16.

Response to Comment Ind 33-2
Please see Master Response 1.

Individual Letter 34

From: Yahoo Mail !
To: bdofsupervisors
Subject: Unhealthy mine
Date: Tuesday, March 22, 2022 11:57:27 AM

Dist 3

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Board of Supervisors, Nevada County, CA US

To Whom it May Concern,

I am in opposition to Rise Gold reopening the Idaho Maryland mine.

It is a bad idea for our neighborhoods, community, our state, country and our Earth.

Ind 34-1

It is an old business paradigm of taking as much as you can from a submissive, yielding earth for the benefit of a few wealthy businessmen looking to get wealthier at the detriment of everyone else around. Those wealthy fat cats aren't even in our own country and their track record of negligence and poor management practices is trailing behind them uncleaned and unresolved.

Please do the best for our fragile and slowly growing county by voting what the people need and want.

Please deny Rise Gold's reopening of the mine.

Emphatically yours,

Antoinette Regan

INDIVIDUAL LETTER 34: ANTOINETTER REGAN

Response to Comment Ind 34-1

Please see Master Responses 1.

Individual Letter 35

From: Antonio Dominguez <artandhomestead@gmail.com>
Sent: Monday, April 4, 2022 3:48 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine STOP

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To Whom it may concern,

Ind 35-1 I am deeply concern with the reopening of the Idaho Maryland Mine. I am concerned for the residents, including the wildlife and the impact that it will have on our water and air quality that will be polluted in our county and region for many years to come. I am concerned for the well being of those generations after us, there is no excuse to put profits over the quality of human life, innocent children. It is tragic that that the though of reopening the mine has even come to existence after the slow recovery we have faced from previous mining in this state, and especially this region. There are many damaging effects that could happen according to the report in the DEIR that are very concerning and have been known to happen.

Ind 35-2 I am concerned with the contaminants and hazardous materials from the process to reopen the mine which requires pumping water from an existing mine, filtering and released back to wolf creek. The leaching of chemical compounds that are used to separate target minerals from ore (sulphuric acid or cyanide). It is not worth the risk even with safeguards.

Ind 35-3 There is already heavy metals in our water supply from previous mining such copper, lead, mercury, arsenic that have leached into our ground water and surface water changing the ph, therefore making it non drinkable water for humans and destroying natural habitats that have been recovering from previous mining.
The amount of water that will be used is unethical with the droughts that we have been experiencing in California for over a decade. Our water table is already extremely low and we should be using that water to combat wildfires and saving lives rather than to make profits. Our area is in short supply, many people rely on drilled wells for their water supply and the aquifers below. If the water table begins to lower residents have to drill deeper in turn its creating a financial stress on many residents. There is also potential of the collapsing of the aquifers creating an even bigger impact, perhaps loss of the aquifer permanently. We need to protect our watershed. The evidence is in the San Juan Ridge Mine. Lets not repeat the same mistake.

Ind 35-4 There is already a great concern with our air quality as we all know with our wildfires in the area, there is absolutely no need to add to the pollution of the air quality. Pollutants like ozone, carbon monoxide, sulfur dioxide, lead, and particulate matter all of which are a health concern and environmental concern. We don't want companies to come in and leave a mess for us locals to have to clean up. We are not signing up for this. This county and state and country has already experienced the detrimental damage from mining. People have died, indigenous peoples have been removed and killed and the environment has been tragically abused and disturbed at a micro level as well as a macro level, we all see it and we all experience it. We don't want to have more of that. I am not for the Idaho Maryland mine to reopen.

Concerned resident

Jose Dominguez
Artandhomestead@gmail.com
2142817677

INDIVIDUAL LETTER 35: ANTONIO DOMINGUEZ

Response to Comment Ind 35-1

The commenter is opposed to the project due to a variety of impacts to resource areas such as hydrology, air quality, and biology. The commenter does provide specific information as to why the DEIR is inadequate in addressing impacts to these resource areas. The commenter's opposition to the project is noted for the decisionmakers. The project's potential impacts to wildlife, air quality, and water quality are addressed in DEIR Chapters 4.4 (Biological Resources), 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and 4.8 (Hydrology and Water Quality), respectively. Regarding quality of life and historic mining, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 35-2

The commenter appears to be concerned with the potential disturbance of existing hazardous materials on the project site as well as the use of hazardous materials as part of project's operations. Impacts related to hazardous materials and water quality are addressed in DEIR Chapter 4.7 (Hazards and Hazardous Materials) and Chapter 4.8 (Hydrology and Water Quality), respectively. Specifically, surface water impacts resulting from mine dewatering are addressed under Impact 4.8-1 on DEIR page 4.8-42. Dewatering water would be discharged to a clay-lined pond for initial contaminant removal and then pumped to a water treatment plant for further treatment to meet applicable state standards, under oversight by the Central Valley Regional Water Quality Board, before discharge to South Fork Wolf Creek. As stated on DEIR page 4.7-28, the project does not propose the use of mercury or cyanide. Sulfuric acid would be used and stored at the proposed water treatment plant. Sulfuric acid and all other potentially hazardous materials stored on the project site would be done so in accordance with applicable storage requirements, as verified by the Fire Marshall's Office prior to project's operation.

In addition, Mitigation Measure 4.7-1(d) of the DEIR requires that prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site.

The comment is noted for the decisionmakers.

Response to Comment Ind 35-3

The first part of the comment refers to environmental effects of historic mining. The comment is noted for the decisionmakers but does not address the project nor the DEIR. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site. The second part of the comment pertains to general concerns regarding water quality and the impact of the project on private wells, especially in light of the drought, but the commenter does not address the adequacy of the DEIR. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 16 - Drought and Climate Change, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 29 - Near Surface Workings.

Response to Comment Ind 35-4

The commenter is generally concerned with the project's adverse impacts to air quality but does not state how the DEIR is inadequate. The project's potential air quality impacts are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The commenter's

opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Individual Letter 36

From: April Webb <webb.renee.april@gmail.com>
Sent: Monday, April 4, 2022 12:53 PM
To: Idaho MMEIR
Subject: No mine

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I am 24 I have lived in grass valley my whole life and I have always been proud of the air quality and cleanliness of the town.

Ind 36-1 Opening back up the mines means no more clean town. Soil holds literal tons of CO2 when you dig up soil it releases CO2, not to mention gold mining produces the most amount of toxic waste than other mining. Just one gold ring produces an Eiffel towers amount of waste. In just five days you can cover the city of Paris completely in waste. Not to mention the amount of mercury and cyanide that gets released into the surrounding soil and water. Grass valley already has cancer from our water and soil being the #1 death rate here, not to mention being bone here means you already have more lead in your system than what is healthy and opening the mine WILL make all of that EVEN WORSE.

Ind 36-2 I would also like to address the fact that some areas WILL need NID installed but there's a reason NID is in only parts of the town, because they weren't able to install on the outer ashes of town (where the mine is) so how exactly do you plan on taking away the surrounding water? If my well dries up I will sue the city and I can if my water dries up. I am not the only one with this thought process. We are mad, we are unhappy, we think those in charge should shove a sock in it and mind their business instead of being greedy for money.

"Who cares about the major environmental impact we want money and that's more important than the towns health" that's how y'all sound FYI greedy rude, and uncaring for anyone but yourselves

Sent from my iPhone

INDIVIDUAL LETTER 36: APRIL WEBB

Response to Comment Ind 36-1
Please see Master Responses 1 and 8.

Response to Comment Ind 36-2
Please see Master Response 14.

Individual Letter 37

To whom it may concern,

I manage a Trust which owns an industrial building in the Whispering Pines Industrial area.

We have the same renter since we built the building. 20 years ago.

Opening the mine will jeopardize our contract, they might move away, taking all the professional people they employ.

If the mine is allowed to open, we will claim that we were misled when we decided to build in that Industrial Park in Grass Valley.

Ind 37-1 How would we pay Property Taxes on an empty building? We would never find another renter.

My kids built a house nearby that area, we moved up here to be near them. They will be leaving, taking great losses, if they do not have water and can not breeze the air.

Most likely, we are not alone with our concerns. What is planned is a scam, sadly we all are going to suffer because of it.

We strongly disapprove of the mine opening and will make the responsible people accountable for the damage we will encounter.

Hoping that you are making the only right decision, and soon, before more people suffer...

Agne Bajla

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MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 37: AQUE BAILA

Response to Comment Ind 37-1

Please see Master Responses 1 and 2.

Individual Letter 38

April 3, 2022

Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Re: Comments on the Idaho-Maryland Mine Project DEIR

Dear Mr. Kelley:

I am a 16 year resident of 11918 East Bennett Road, GV, living with my wife and young daughter. Our property is approximately in the middle of the proposed mine underground footprint, surrounded by large ponderosa pines, oaks and madrones, across the road from South Fork Wolf Creek. I am very familiar with the details and environmental impacts of this current, as well as former proposals to re-open this mine, shuttered for over 65 years. The impacts are many, and significant to the nearby residents. Our life would be disrupted forever should this proposal ever come to fruition. There are virtually no impacts identified in this proposal that would not directly change our life for the worse in our bucolic, peaceful neighborhood. In addition, real estate values in our neighborhood will clearly decrease, impacting our financial ability to retire as we have planned. Every legitimate local real estate agent will testify to this reduction of our home values.

Ind 38-1

There are many impacts that are inadequately described, but I will highlight a few that seem most egregious to me. The following sections of the DEIR are inadequate under CA law in describing the full impacts of this mine proposal:

CENTENNIAL SITE CLEANUP AND INCLUSION WITH THE MINE PROJECT DEIR

The Centennial Site owned by Rise Gold is a key and necessary part of their proposal. It is also a heavily toxic, (literal Superfund site), now under a superseding cleanup obligation imposed by the State of California on Rise Gold. My comments during the NOP DEIR scoping process were heavily focused on making sure that the complex cleanup project at Centennial is fully identified, and coordinated with any mine re-opening proposal, completed before any mine operation could be fully vetted by the Planners and Supervisors.. When I saw the DEIR did not include this full coordination after all those many months, it was incredibly surprising and a glaring flaw of the DEIR.

Ind 38-2

The DEIR simply assumes that the Centennial site will be cleaned up, making the baseline analysis severely flawed. No agency or approving entity can simply assume this complex cleanup will take place. Currently, the applicant has not started any cleanup (to my knowledge), and currently does not have financial means to accomplish the full and proper cleanup. Nothing about the cleanup can be assumed. The mandated cleanup is critically important to the health

Ind 38-3

of the community and a vital part of waste rock disposal at the heart of the mine project. Without the full cleanup of the Centennial site, and a new reworked waste rock disposal plan, the DEIR is severely flawed. This section of the DEIR is inadequate and will need a full reworking to include the cleanup process, and then a new and complete analysis of the impacts.

HYDROLOGY- GROUNDWATER IMPACTS AND WELLS

Ind 38-4 Other than the glaring flaw in the analysis of the Centennial site, hydrology is, in my opinion, the section on hydrology contains inadequate evaluation of groundwater impacts and impacts on wells. This section is lacking any real detail, and limited modeling, and contains only a very limited analysis of the potential impacts to the water levels in the area (ie, streams, groundwater levels), and particularly wells both inside and outside of the small area on East Bennett Road. Water is the most important thing we value here in CA and the Foothills, and to use old, recycled and very limited data from previous applications without a new and comprehensive analysis, renders this section inadequate and severely flawed. Nevada County is no stranger to functioning wells being destroyed by mining operations, so detail and use of outside experts is paramount here. There are potentially hundreds of properties who are likely or potentially impacted by dewatering, and yet there are no outside expert models and analysis contained in the DEIR. The County requires immediate replacement of water supplies for residents being rendered inadequate by mining impacts, as well as use of outside experts, so this section of the DEIR is severely inadequate, necessitating a full rewriting of this section of the DEIR.

Ind 38-5 In addition, the mitigation plan for the limited amount of wells in the East Bennett Road area is inadequate. The applicant proposes to install NID water connections and "pay for" monthly expenses, but the applicant limits reimbursement of NID water usage to an arbitrary amount, and does not nearly account for a full replacement of water usage prior to decommissioning of each well. In addition, the applicant cannot demonstrate any financial ability to completely

Ind 38-6 indemnify the residents from impacts. There is no comprehensive bond in place to account for resident's potential water usage above the arbitrary level set by the applicant. The replacement of our wells is not our choice. Our water usage cannot be set to some arbitrary number. This section of the DEIR is inadequate in mitigating the impacts of dewatering on wells.

GREENHOUSE GAS EMISSIONS

Ind 38-7 Greenhouse Gas Emissions studied in the DEIR are grossly inadequate in describing the full 80 year life of the mine proposal, and all of the associated sources of GHG. There is an arbitrary annual level of GHG assumed under the mining plan, but no detail to back this up. Since there is far from any assurance that the toxic Centennial site will be available for the initial storage of waste rock, there must be an analysis done of GHG emissions caused by further offsite hauling. The impacts from GHG emissions caused by offsite trucking of waste rock are severely understated if Centennial is not available. Since the mining plan does not adequately account for the coordination of Centennial cleanup and use thereafter, this DEIR section must be re-written to account for the strong possibility of much larger GHG emissions created by longer route hauling of waste rock.

Ind 38-8 In addition, there is no analysis of GHG emissions from the cement manufacturing required for the cement paste backfill of waste rock, and does not account for GHG emissions from the hauling of the gold product to subsequent processing facilities offsite, far remote from Grass Valley.

Ind 38-9 The DEIR also neglects to mention and analyze the incompatibility of this DEIR and mining plan with the Nevada County Energy Action Plan, as well as the goals of the state of California (CARB). The goal is to reduce GHG by 50% by 2035. Incredibly, this single mining project would nearly emit the same amount of GHG as all of the current county non-residential use of GHG. Nevada County cannot possibly meet its emission goals with a project of this type. And under CARB, new projects should strive to achieve a zero-net impact on GHG emissions.

Ind 38-10 The entirety of the project flies in the face and contradicts County and State goals for GHG emission reductions. The DEIR does not nearly account for the entirety of GHG emissions from this project. The DEIR must conclude that the entirety of impacts from GHG increases are significant and unavoidable.

Ind 38-11 Thank you for allowing me to comment on 3 of the most obviously deficient areas of the DEIR. I am concerned with many, many more, but trust that they will be documented by other citizens and the many experts and agencies who will weigh in during this DEIR process.

Thank you,

Art Healy

11918 East Bennett Road
Grass Valley, CA 95945

INDIVIDUAL LETTER 38: ART HEALY

Response to Comment Ind 38-1

The commenter expresses general opposition to the project, quality of life issues, and real estate value. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues. Responses to specific comments are provided below.

Response to Comment Ind 38-2

The commenter states that the Centennial Industrial Site is a Superfund site and that the Project Applicant is under an obligation by the State of California to clean up the site. The commenter also states that the DEIR is deficient for not including a discussion of the Centennial Industrial Site cleanup. However, the Centennial Industrial Site is not a designated Superfund site. In 2005, the EPA identified the Centennial Industrial Site as potentially needing environmental remediation and in 2018 confirmed that environmental remediation is necessary for the site. (DEIR, p. 1-4.) The Project Applicant entered into a voluntary agreement with the California Department of Toxic Substances Control (DTSC) to implement a Remedial Action Plan (RAP) to clean up the site. (DEIR, p. 3-10.) The RAP is currently under review by the DTSC. (*Ibid*.) The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site. For CEQA purposes, the cleanup project is a separate project and discussion of the Centennial Industrial Site cleanup need not be included in the Idaho-Maryland Mine DEIR. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 38-3

The commenter states that the DEIR assumes the Centennial Industrial Site will be cleaned up and that the DEIR is deficient because it does not plan for this outcome. The DEIR states that it is the Project Applicant's intent to place engineered fill at the Centennial Industrial Site. (DEIR, p. 3-26.) However, in the event that the cleanup of the Centennial Industrial Site is not complete upon the commencement of mining, or not complete within the life of the mining permit, engineered fill would be placed at the Brunswick Industrial Site or transported off-site to be used in local and regional construction markets. (*Ibid*.) The commenter is directed to Master Response 4 - Cleanup Project is a Separate Project Under CEQA and Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 38-4

The commenter states that the DEIR's Hydrology and Water Quality section is deficient because the analysis and modeling are limited, but does not provide any additional information on why the section is limited. The commenter also indicates that the DEIR's Hydrology and Water Quality section underestimates the number of groundwater wells impacted by the project or does not rely on outside hydrology experts, but does not provide further detail. The commenter is referred to the DEIR, Chapter 4.8 (Hydrology and Water Quality). Regarding the adequacy of DEIR's analysis of impacts to private wells, the commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter is also referred to the various studies upon which DEIR Chapter 4.8 relies – Appendix K.2 (Groundwater Hydrology and Water Quality Analysis), Appendix K.3 (Groundwater Model Report), Appendix K.7 (West Yost Peer Review), Appendix K.8 (Idaho-Maryland Mine Groundwater Monitoring Plan), and Appendix K.9 (Idaho-Maryland Well Mitigation Plan.) Regarding the commenter's statement that water replacement is required for impacted wells, this is already required in the DEIR by Mitigation Measure 4.8-2(b) and General Plan Policy 17.12.

Note that the groundwater analysis was reviewed by the County's independent experts at West Yost, who provided input and concurred with the results of the analysis.

Response to Comment Ind 38-5

The commenter states that the DEIR's Appendix K.9, Idaho-Maryland Well Mitigation Plan, is inadequate because the impacted properties would be compensated at an arbitrary amount. The reimbursement rate for NID water in the Well Mitigation Plan is $870, which assumes a daily use per house of 400 gallons per day at current water rates. (DEIR, Appendix K.9, p. 3.) This replacement amount was based on average usage data from NID, and the commenter provides no evidence identifying why this amount is inadequate. The commenter is referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 38-6

The commenter states that the DEIR is inadequate because it does not demonstrate that the Project Applicant has the financial ability to reimburse residents with impacted private wells above the 400 gallon per day threshold. The financial condition of the Project Applicant is outside the scope of CEQA review. However, Nevada County General Plan Policy 17.12, which is referenced in the Well Mitigation Plan, provides that the operator of the mine must guarantee a comparable supply of water to such homes or businesses through accessible forms of security or alternate sources of water. (DEIR, Appendix K.9, p. 1.) The commenter is also referred to Master Response 15 -Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 38-7

The commenter assumes that if the Centennial Industrial Site were not available for fill placement, then that fill would be immediately hauled to offsite locations, which would result in CO_2 and NO_x emissions exceeding thresholds of significance. However, if the Centennial Industrial Site were not available, fill placement would take place initially at the Brunswick Industrial Site rather than being immediately hauled to local and regional construction projects. (DEIR, p. 3-26.) The DEIR states "[i]f the separate DTSC cleanup project is not approved by DTSC and completed within the term of the Idaho Maryland Mine Project use permit, engineered fill would be placed on the Brunswick site, but not the Centennial site, and the remainder would be hauled to local and regional markets." (DEIR, p. 1-3.) Moreover, the DEIR already analyzed impacts related to hauling of material to local and regional markets. (DEIR, p. 1-3.) GHG emissions and NO_x emissions would not exceed thresholds in this scenario. Please see response to referenced Baseline comment, Response to Comment Grp 21-122. Finally, the applicant has agreed to a condition of approval requiring that if the Centennial Industrial Site is not available to accept engineered fill when project operations commence, then the following conditions apply: (a) the engineered fill material will be first placed at the Brunswick Industrial Site until that site is at capacity prior to selling waste rock or tailings offsite; or, (b) waste rock or tailings materials sold offsite will be transported in electric trucks.

Response to Comment Ind 38-8

The commenter states that the DEIR contains no analysis of GHG emissions from the production of the cement necessary for the cement paste backfill. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. The commenter is directed to Master Response 26 – Life Cycle GHG emissions. The commenter also states that the DEIR does not discuss GHGs produced from the hauling of gold product to subsequent processing facilities. The air quality analysis analyzed emissions of gold concentrate hauling to the Port of Oakland, where the concentrate would be delivered to gold concentrate purchasers. The subsequent movement of that gold concentrate material is not required, as that would constitute a lifecycle analysis.

Response to Comment Ind 38-9

The commenter states that the DEIR fails to mention that the project is incompatible with Nevada County's Energy Action Plan (EAP) and the California Air Resources Board's statewide climate goals. The commenter also states that new projects should have a net-zero GHG impact. As stated in the DEIR, the EAP is not a Qualified GHG Emissions Reduction Plan under CEQA. (DEIR, p. 4.3-89; CEQA Guidelines § 15138.5(b)(1)(D).) Therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and the project was found to be consistent with the EAP. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan. CEQA does not require that the project achieve a net-zero threshold for GHG emissions. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 38-10

The commenter states that the entirety of GHG emissions is not accounted for in the DEIR, but does not explain how it is deficient. The project's GHG emissions have been found to be less than significant after mitigation. The commenter is referred to the DEIR, Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 38-11

This comment is a closing statement expressing thanks for the opportunity to comment and concern about the project. Comment noted.

Individual Letter 39

From: Ashley Hall <hallas@sonoma.edu>
Sent: Monday, April 4, 2022 11:20 AM
To: Idaho MMEIR
Cc: commgr@cea-nc.org
Subject: Comments on DEIR from Nevada County Resident Ashley C. Hall
Attachments: Comments on DEIR--Idaho Maryland Mine.docx

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Dear Mr. Matt Kelley and esteemed members of the Nevada County Planning Department,

I am writing to express my serious concerns about the Draft Environmental Impact Report (DEIR) for the proposed reopening of the Idaho Maryland Mine near Grass Valley by Canadian company, Rise Gold Corporation.

Ind 39-1

As a resident of Nevada County since 1978, father of two young children, professor of Native American Studies at Sonoma State University (Ph.D., UC Davis, 2006), and ally of Nisenan and other tribal peoples, I am deeply concerned about impacts to aesthetic resources, terrestrial and aquatic biological resources, and tribal cultural resources that are inadequately addressed in the DEIR. Given my professional expertise, I focus my comments here on the issue of Tribal and Cultural Resources in the DEIR.

Tribal and Cultural Resources:

Ind 39-2

On page 2-62 under 4.5-3, the DEIR acknowledges that reopening the Idaho Maryland Mine will likely disturb human remains, including those interred outside of dedicated cemeteries; likewise, on page 2-63 under 4.5-4 the DEIR acknowledges that reopening the Idaho Maryland Mine will cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe. Under 4.5-3 and 4.5-4 the DEIR lists these impacts as significant ('S'). In light of the acknowledgements of these potentially significant impacts, I am concerned that on page 2-63 under 4.5-6, the DEIR claims that the potential cumulative loss of cultural resources is less than significant ('LS'). Under 4.5-6, the DEIR attempts to exempts the. Since the impacts under 4.5-3 and 4.5-4 are deemed significant, the cumulative loss of cultural resources should also be deemed 'S' and should require mitigation as outlined under CEQA Guidelines Section 15126.4(3) and any other applicable ordinances and policies. Alternative land use options should also be explored, e.g., purchase by Nevada County as cultural, historical, conservation easement.

Ind 39-3

I am also concerned with the proposed timeline, which calls for 'dewatering' of the mine prior to consultation with cultural resource experts, MLDs, or tribal members. Cultural resources at the project site should be evaluated prior to initiation of any phase of the project.

1

Rise Gold CEO, Benjamin Mossman's Track Record:

Along with the problems in the DEIR itself identified above, I am concerned about Rise Gold CEO, Benjamin Mossman's record of flouting Gitxaala (Canadian First Nation) tribal authority. As CEO of another Canadian mining corporation, Banks Island Gold, Mossman presided over a company that carried out a mining project in Gitxaala territory despite the stated opposition of the Gitxaala to mining operations on Banks Island, British Columbia, Canada, in an area Gitxaala Tribal Member, Leena Minifie describes as "part of the remote archipelago of islands that comprise Gitxaala territory. It is a central site for food gathering for the Gitxaala people, who live off the salmon, as well as halibut cod, mussels, cockle, seaweed and sea asparagus found in the area. Seaweed collection and drying camps are established there during the summer in order to build food stocks for the winter. Now that effluent is leaking into the streams and surrounding area, many people are afraid to harvest."(https://ricochet.media/en/537/banks-island-gold-refused-to-shut-down-mine-after-spill-in-remote-coastal-bc accessed 04/04 11:00 Accessed 04/04/22 at 11:00 AM). Given Rise Gold's CEO's documented unwillingness to honor the stated opposition of Gixaala objections to a mining project, the shortcomings and inconsistencies in the DEIR noted above, and the broader historical role of the mining industry in the dispossession, ecological destruction, and physical and cultural genocide of California Indian lands and people*, I am deeply concerned that Rise Gold will fail to provide adequate study and mitigation for the cumulative effects of their activities on tribal cultural, biological and other resources in Nevada County.

Ind 39-4

For the reasons detailed above, I urge you, Mr. Kelley and esteemed members of the Nevada County Planning Department, to order significant study and revision to the DEIR and to seriously consider the option of purchasing the land for a cultural, archaeological and conservation easement that would preserve those resources for Nisenan people, other residents of Nevada County, and the plant and animal communities who would be negatively impacted by reopening the Idaho Maryland Mine.

*As a general note, the history of mining in Nevada County and throughout California must be viewed in the context of the genocide of California Indian peoples and the ecological devastation to Indigenous homelands precipitated by the Gold Rush.

Ind 39-5

--
Ashley C. Hall, PhD
Adjunct Professor
Native American Studies & American Multicultural Studies
Sonoma State University
1801 East Cotati Ave., Rohnert Park, CA 94927

Sonoma State sits on the land of the Coast Miwok & Southern Pomo people. Learn more about the Federated Indians of Graton Rancheria here:

INDIVIDUAL LETTER 39: ASHLEY HALL

Response to Comment Ind 39-1
Please see Master Response 1.

Response to Comment Ind 39-2
Table 2-1 included in Chapter 2, Executive Summary, of the DEIR provides a table summary of the conclusions of the environmental analysis provided in Chapters 4.1 through 4.13 of the DEIR. A detailed analysis of Impacts 4.5-3 and 4.5-4 is included in Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR. As discussed therein, Mitigation Measures 4.5-3 and 4.5-4 would ensure that less than significant impacts would occur related to the disturbance of any human remains, including those interred outside of dedicated cemeteries, or the potential for the proposed project to cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074. Furthermore, as discussed on page 4.5-34 of the DEIR, Generally, while some cultural resources may have regional significance, the resources themselves are site-specific, and impacts to them are project-specific. For example, impacts to a subsurface archeological find at one project site would not generally be made worse by impacts to a cultural resource at another site due to development of another project. Rather, the resources and the effects upon them are generally independent. Therefore, given that cultural resource impacts are generally site-specific and each future project within Nevada County would be required to mitigate such impacts, any potential impacts associated with cumulative buildout of the County would not combine to result in a cumulatively considerable impact. As such, impacts related to cultural and Tribal Cultural Resources were adequately addressed in the DEIR.

Response to Comment Ind 39-3
As discussed on page 4.5-28 of the DEIR, the underground workings of the Idaho-Maryland Mine Company are not currently accessible to historic preservation professionals and the public because the tunnels are flooded with groundwater. Therefore, evaluation of any cultural resources located within the underground workings of the Idaho-Maryland Mine is not feasible.

Response to Comment Ind 39-4
Please see Master Response 3.

Response to Comment Ind 39-5
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 40

RECEIVED 2nd Copy

MAR 21 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

To: Nevada County Board of Supervisors
From: Dave and Dianna Connell
Regarding: Idaho-Maryland Mine

Ind 40-1

If you were building a new home, would you give that job to a contractor of questionable character? A company that went bankrupt with court cases continuing? The obvious answer is "No Way!" Yet here we are with Rise Gold wanting to reopen and work the Idaho-Maryland Mine for 80 years! This contractor is on shaky ground (literally and figuratively).
We are definitely opposed to this mine reopening under any circumstances. There are many questionable issues surrounding the reopening of the mine for which we have concerns: noise pollution, air pollution, wells being depleted, dump trucks running 24/7, employment promises that are highly suspect, and a deceptive company running the show. Sounds like a recipe for disaster! Let's avoid this one!

Dist 1 Ginger Van Wagner 12655 Butterfly Dr. Nevada City
Dist 3 Carol McDonald 555 Scadden Dr. Grass Valley, CA
Dist 1 Lynda M Cooper 12963 Butterfly Drive Nevada City, CA
Non-resident Josh Bramlett – non resident, but visited area for 51 years
Dist 3 Patricia Haller 14648 Bradbury Pl. G.V.
Dist 1 Carolyn & Larry Homan 11656 Thomas Ranch Cir. NC, CA
Dist 1 Walt + Sharon Watson 13656 Pegasus Pl., N.C., CA
Dist 1 Audrey & Greg Hight 12956 Mayflower Dr., N.C., CA

INDIVIDUAL LETTER 40: AUDREY HIGHT, CAROLYN AND LARRY HOMAN, GINGER VAN WAGNER, CAROL MCDONALD, JACK BRONEITH, LYNDA COOPER, PATRICIA HOLLER, AND WALT WATSON

Response to Comment Ind 40-1

Please see Master Response 1, and 3.

Individual Letter 41

Audrey Jacus
District 1
Grass Valley

Stop the Mine

To Whom It May Concern,

Ind 41-1

I grew up in this beautiful County, and after having lived in Washington for a few years, I believe that nothing compares to the beauty of our little town. I would like to protect that at all costs. I think that this mine will destroy life as we know it in Nevada County. I believe that we would become the next Flint, Michigan. Destroying our environment, air quality, water supply, and wildlife. As a young adult who grew up with an underground well supplying my drinking water, I don't want to see the actions of a greedy conglomerate destroy the peaceful beautiful town we have all called home for so long. If you truly believe going forward with this mining development will benefit anyone other than those in the company then you are grossly misinformed. This mine will not increase revenue or help our economy, it will simply line the pockets of a select few, while destroying the livelihood of many others. Our world already has enough problems when it comes to destroying the environment, let's do our part to not add to the destruction. I could go on for hours about all of the specific scientific reasons why this mine is a terrible idea, as I am sure many others are. I would simply like to say, this mine will be a disaster, and should be stopped at all costs. Do not let sweet words and empty promises talk you into making the biggest mistake of your life. If this mine is opened you will not only be destroying a community, and the environment, but you will be destroying a way of life. I strongly urge you to put this issue to rest.

Sincerely,
A Concerned Citizen.

INDIVIDUAL LETTER 41: AUDREY JACUS

Response to Comment Ind 40-1

Please see Master Response 1.

Individual Letter 42

3/24/2022

Nevada County Planning Department
950 Maidu Avenue, #170
Nevada City, CA 95959



225 South Auburn Street
Grass Valley, Ca
95945

Dear Mr. Matt Kelley,

Ind 42-1 Rise Gold, is The company that is 15 years old and never made any profits from any of their projects. All they've done is leave Canada in a mess. They dumped millions of pounds of toxic waste into a native river, that's exactly what they're going to do in the grass valley. Real estate professionals say that property value will drop down 5-20%. I believe that they should not reopen the Idaho Maryland mine because the grass valley air quality is already not that good and the mine will make it even worse.

Ind 42-2 All the escaped dust from the mine continuous rock loading, crushing hauling, and unloading. Chronic Lung disease will double in rates.

Ind 42-3 Water is one of the most important resources especially in California because of the drought Rise gold plans to pump 3.6 million gallons of water every day for 6 months. After the 6 months, they will pump 1.2 million every day. They also plan to "dewater" the abandoned tunnels which means treating the south fork and wolf creek like storm drains. 75 acres of land will be replaced with giant piles of mine waste that will kill all the wildlife in the area and destroy their habitat.

Ind 42-4 Our nice peaceful town will turn into chaos. Loud machines 100+ trucks dumping and taking thousands of pounds of mine waste through the town. Hard rock mining is the largest source of toxic waste in the United States.

Ind 42-5 Some people argue that the mine will open up thousands of jobs for the community. However, this company has proven that they cannot be successful, so these jobs won't last anyway. Others argue that the mine will also restore history. However, history isn't the most important thing when it comes to a thriving town. The US has some awful history that shouldn't be a part of who we are. The Idaho Maryland mine was once open but shut down because of the damage it caused To our town.

Ind 42-6 Because of the toxicity of the mine, many innocent people could die and this peaceful town could turn into chaos. They dumped millions of pounds of toxic waste into a native river, that's exactly what they're going to do in the grass valley. I believe that the mine will harm many innocent people and don't think that it's right. I love my town and how we do things. I wouldn't

want to ruin it with a mine. We've already gone through this, we don't need to go through it again.

Sincerely,

Austin Fouyer Austin Fouyer

INDIVIDUAL LETTER 42: AUSTIN FOUYER

Response to Comment Ind 42-1
Please see Master Responses 1 and 3.

Response to Comment Ind 42-2
Please refer to Impact 4.3-2 in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR, which provides a detailed analysis of whether the project would expose sensitive receptors to substantial air pollutant concentrations.

Response to Comment Ind 42-3
Please see Master Responses 8 and 25. In addition, please refer to Impact 4.8-2 in Chapter 4.8, Hydrology and Water Quality, of the DEIR, which provides a detailed analysis of whether the project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Response to Comment Ind 42-4
Please see Master Response 8.

Response to Comment Ind 42-5
Please see Master Responses 1, 2, and 3.

Response to Comment Ind 42-6
Please see Master Responses 1 and 3.

Individual Letter 43

From: Avila Lowrance <paloma@sierraemail.com>
Sent: Monday, April 4, 2022 9:25 AM
To: Idaho MMEIR
Subject: DEIR Idaho Maryland Mine

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Ind 43-1 The DEIR does not account for how the proposed gold that is extracted from the mine would be transported to its final destination. Fort Knox? How many trucks would be needed along our roads to get the stuff out of here and get it all the way to Kentucky?

Ind 43-2 Doesn't it make more sense to leave the gold in the ground? That would leave the way open for Nevada County to continue on its bright path as a rural getaway, a mountain retreat, an arts center, a tourist destination, and a thriving community of active, smart folks who are working to protect and enhance the natural beauty of this area while we continue to move forward, not backward.

Ind 43-3 In summary, if this terrible project goes forward, the DEIR must address the carbon cost of transporting the refined ore to the final processing center, and also of the finished product (gold ingots) to their ultimate destination, including the cost of storing the ingots for the projected time of storage.

Respectfully submitted,
Avila Lowrance
11741 Alta Vista Avenue
Grass Valley 95945

1

INDIVIDUAL LETTER 43: AVILA LOWRANCE

Response to Comment Ind 43-1

As discussed on page 3-28 of the DEIR, off-site haul of gold concentrate will average one truck trip per day, and up to five truck trips per day, using Brunswick Road to State Route (SR) 20/49, over the 80-year term of the use permit. Chapter 4.12, Transportation, provides an analysis of project trip generation and distribution, including trips associated with the off-site haul of gold concentrate. As such, off-site transportation of gold was adequately addressed in the DEIR.

Response to Comment Ind 43-2

Please see Master Responses 1 and 2.

Response to Comment Ind 43-3

The comment refers to the cost of storing ingots, which is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Response to Comment 43-1 regarding trips associated with the off-site haul of gold concentrate, as well as Chapter 4.3, Air Quality, Greenhouse Gas, and Energy, of the DEIR, which includes an analysis of metric tons of carbon dioxide equivalent ($MTCO_2e$) that would be generated by the proposed project. Project specific trip generation rates were applied to the greenhouse gas (GHG) modeling conducted for the proposed project. Therefore, the carbon cost of transporting goods from the mine has been considered in the DEIR. Please see also Master Response 26.

Individual Letter 44

From: Barbara Gentry
To: Idaho MMEIR
Subject: Idaho-Maryland Mine
Date: Friday, March 11, 2022 7:11:19 AM

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Dear Nevada County Board of Supervisors,

Please oppose the reopening of the Idaho-Maryland Mine.

As a 42-year resident of Nevada County, I urge you to retain the integrity of our community by opposing the reopening of the Idaho Maryland Mine.

Ind 44-1

What is at stake?
Mine and wastewater pollution
Noise pollution from mine operations and vehicles serving it
Increased greenhouse emissions
Increased traffic and safely concerns
Lower home values in the neighborhoods adjacent to the mine

For the sake of our community today and in the future, exercise your wisdom and integrity by opposing the reopening of the mine. Please don't let increased revenue sway you to agree to a plan that will deeply impact and degrade life in Nevada County.

Barbara Gentry
545 Jordan Street
Nevada City, Ca
530-559-4084

INDIVIDUAL LETTER 44: BARBARA GENTRY

Response to Comment Ind 44-1

Please see Master Response 1.

Individual Letter 45

From: Barbara Jensen
To: bdofsupervisors
Subject: Idaho Maryland Mine
Date: Thursday, February 17, 2022 8:16:29 AM

Dist 4

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Ind 45-1

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine.

My family & I moved to Nevada County from the Bay Area 20+ years ago to enjoy a cleaner, quieter life. We own a home (and have owned 3 others), eat, shop, recreate, and plan to retire here. The Mine is detrimental to our quality of life and will cause many of your constituents to leave the County.

Bad idea, Sups!

Thank you for your time.
Barbara Jensen
Rough & Ready, CA

INDIVIDUAL LETTER 45: BARBARA JENSEN

Response to Comment Ind 45-1

Please see Master Response 1.

Individual Letter 46

DO NOT

I support re-opening the Idaho-Maryland Mine

Dist 3

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 46-1

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) BARBARA KROCZAK

Address 145 Independence Ct ZIP 95945

Phone 510-742-8025

Email Address bkroczak@gmail.com

INDIVIDUAL LETTER 46: BARBARA KROCZAK

Response to Comment Ind 44-1

Please see Master Response 1.

Individual Letter 47

From: Barbara Larsen <blarsen@nccn.net>
Sent: Sunday, March 20, 2022 10:21 AM
To: Idaho MMEIR
Subject: no on the reopening of the Idaho Marilyn Mine

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Dear Matt Kelley,

We are writing to state that we oppose the reopening of the Idaho Marilyn Mine!

Ind 47-1 In the over 43 years we have lived in Nevada County as citizens who provide safety net resources and services for our veterans and family caregivers who have a loved with Alzheimer's disease or a related dementia this proposal is very out of step with the progress we have made to keep our lovely county the beautiful county in which tourists, family and friends enjoy coming to.

Ind 47-2 All corporations and businesses who gain profit from the destruction of our environment say, "we have it under control." That is until they DON'T.....and then who suffers.....the consumers. Just like PG&E. When they were held responsible for the Paradise Fire what was the outcome for the stricken residents: Even when they were able to rebuild many, many people could not purchase fire insurance. Shouldn't PG&E pay for their home insurance since they were the one's held responsible for the fire!!

Nobody has Mother Nature under control.....so, please, stop this nonsense and don't fall into the trap of the mine owner's idiot logic.

Thank you,
Bill and Barbara Larsen

INDIVIDUAL LETTER 47: BARBARA LARSEN

Response to Comment Ind 47-1
Please see Master Response 1.

Response to Comment Ind 47-2
Please see Master Response 1.

Individual Letter 48

From: Barbara Raymond <braymond@gmail.com>
Sent: Monday, April 4, 2022 4:55 PM
To: Idaho MMEIR
Subject: Resident Comments on DEIR for New Mine
Attachments: rise6.png; rise5.png

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Hello Mr Kelley,

Ind 48-1 Thank you for being a part of this community and helping to support the well-being of our local environment. I'm writing as a resident of Cedar Ridge for 47 years. My father bought the surface to 100' mineral rights access on our land from Mrs. Ghidotti herself in since 1975 and I looked for gold for years (sadly with no success).

Obviously, there are a number of important concerns about the environmental impacts a new mine would bring. I will focus here on water and the stability of the ground. I was fortunate to learn about local gold mining as a girl here and I was always intrigued by the fact that there are well more than 3000 miles of tunnels lattice-worked throughout the two towns and surrounding areas. I knew kids who would go into tunnels at known locations and try to work their way underground (that was not too successful either). I went to school with Footes and other well known mining families. And I heard plenty about mine accidents and the devastations that could occur.

As a result, I've understood that we are in a singular geographic situation here, with miles of tunnels filled with water. In fact, the extent of the tunnels was never fully known, to my knowledge. And Rise Gold has been clear in its investor materials that access to the USGS was denied by the prior mine owners, so no government institution had a record of what the mine owners knew (see attached screen shots from their you tube video – link below).

Ind 48-2 This arrangement, of water in tunnels underpinning the entire community, stabilizes our ground and provides a water table that protects our trees. Given these truly unique conditions, there is simply no credible way that the DEIR is accurate in forecasting the impacts and effects of the proposed massive dewatering. And properly understand it we must, given the scale of the risk the County would be assuming.

Ind 48-3 The proposed massive dewatering potentially jeopardizes the entire latticed area. How is the County to be certain of the effects of losing all that water? How are we not to have more and more sinkholes? How are our trees to not dry to tinder, at the same time that we are in the middle of an historic 'mega drought?' The State of California has issued emergency stoppages on a number of projects that have the potential to increase fire risk. Why would Nevada County, in the heart of fire country, entertain an intentional draining of the water table? Set the forecasting on individual wells aside. It's the water table that demands understanding. Who is responsible when a fire rages right along East Bennett into downtown Grass Valley?

Ind 48-4 It seems clear that for the Nevada County government to fully understand the scope of potential harm to the environment and community and to therefore limit its legal liabilities, a much more in-depth modeling with the exact details of this specific underground environment must be conducted. Analysis cannot be safely premised on simply the type of rock in the area. This is a mined-out area which the earth has been reclaiming and stabilizing for 80 years. There is so much more that needs to be understood.

1

Ind 48-5

To prevent a catastrophe that could devastate this community, there must be commensurate investment. Given the unprecedented situation here and the scale of the risk, a detailed model needs to be developed and run through scenarios. I'd like to see corroborating models run as well. This is standard of practice in many research institutions. I know that underwater drone technology is available and there are powerful computer models that can be developed and run. I urge the County to require these models be created and shared transparently with the local residents.

Ind 48-6

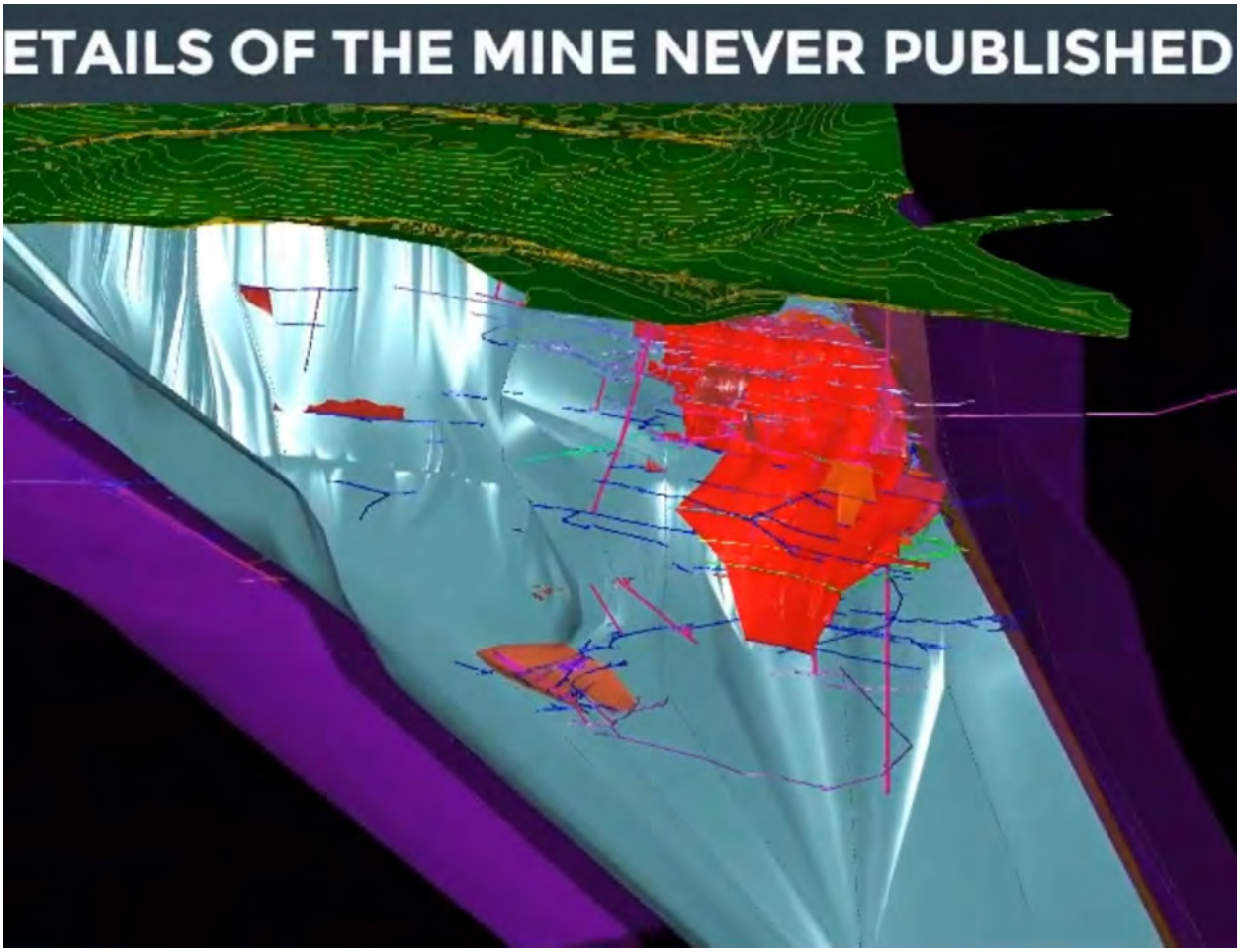
It is one thing for a child to pan for gold in the old mine irrigation ditch and be intrigued by tunnels. It is another thing entirely for a government entrusted with protecting its people and environment to proceed with a decision which has such monumental implications on inadequate, incomplete, and therefore necessarily incorrect statements such as presented in the existing DEIR.

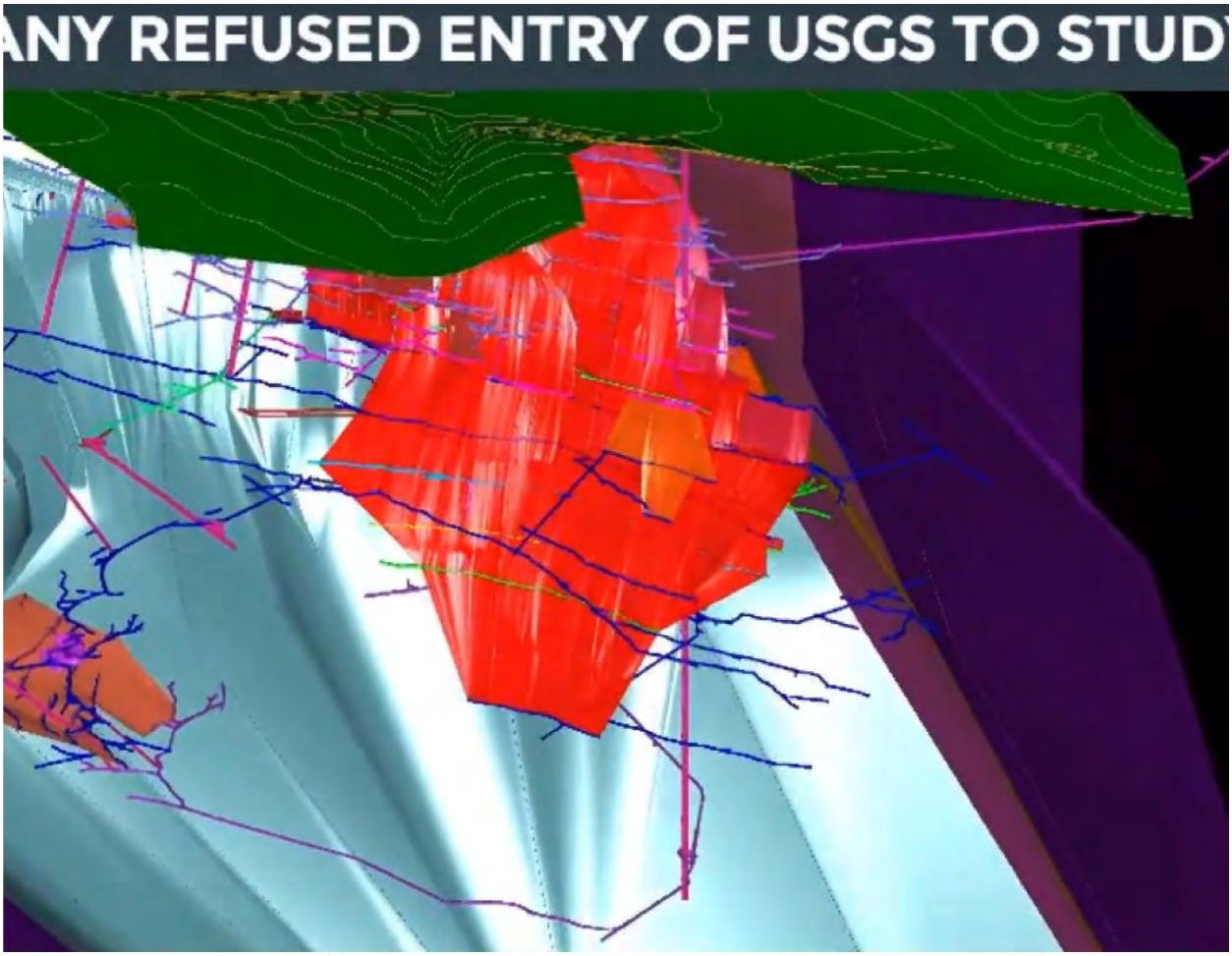
Thank you again for your efforts toward keeping this community a wonderful place to grow up, do business, recreate, and retire.

Sincerely
Barbara Raymond
PO Box 340
Cedar Ridge CA 95924

Ind 48-7

https://www.youtube.com/watch?v=i3pM2dj-U0o&t=185s


ETAILS OF THE MINE NEVER PUBLISHED


ANY REFUSED ENTRY OF USGS TO STUD

INDIVIDUAL LETTER 48: BARBARA RAYMOND

Response to Comment Ind 48-1
This comment is introductory in nature and the commenter discusses her upbringing in the area and familiarity with the mining history and operations of the region. The commenter also states that the full extent of tunnels was never fully known and that no government entity has a record of historic mine tunnels that was known by the mine owners. The Project Applicant has provided maps of the Idaho-Maryland Mine tunnels which are used in the analysis of the DEIR. The commenter is referred to Appendices H.6, K.2, and K.3 of the DEIR.

Response to Comment Ind 48-2
The commenter is concerned that the dewatering of the mine will have adverse impacts to private groundwater wells, vegetation, and ground stabilization but does not provide specific reasons why the DEIR is inadequate. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 29 - Near Surface Workings, and Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 48-3
The commenter reiterates many of the same concerns in Comment Ind 448-2 regarding the dewatering of the mine. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 29 - Near Surface Workings, and Master Response 33 - Groundwater Dependent Vegetation. The commenter also expresses concern regarding the dewatering in connection with the drought and wildfire risks. The commenter is referred to Master Response 16 – Drought and Climate Change, and Master Response 6 – Wildfire Impacts.

Response to Comment Ind 48-4
The commenter states that Nevada County need to further analyze the underground mine workings. However, the commenter does not explain how the DEIR's current analysis of the underground mine workings is inadequate. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 29 - Near Surface Workings, and Appendices H.6, K.2, and K.3 of the DEIR.

Response to Comment Ind 48-5
The commenter reiterates concerns regarding the supposed lack of knowledge of the underground mine workings. The Project Applicant has provided maps of mine tunnels which are used in the analysis of the DEIR. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 29 – Near Surface Workings, and Appendices H.6, K.2, and K.3 of the DEIR.

Response to Comment Ind 48-6
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 48-7
The commenter provides a link to a YouTube video. No response is required.

Individual Letter 49

From: Barney Dewey <barney@deweys.org>
Sent: Monday, March 21, 2022 3:32 PM
To: Idaho MMEIR
Cc: bdofsupervisors
Subject: Lack of Idaho-Maryland Mine Project noise and vibration analysis for the Cedar Ridge area

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

via email: Idaho.MMEIR@co.nevada.ca.us

Mr Kelly,

I am strongly opposed to the Idaho-Maryland Mine Project and have significant concerns about the findings and inadequacies of the Draft Environmental Impact Report (DEIR).

I believe the report does not reflect what the actual noise level will be at my and my neighbor's homes. I live in The Cedars. My home is about 2,500 feet from the Brunswick mine property/operations. The report has only one noise receptor between our home and the mine (#30). Before this project goes forward, I ask that multiple noise receptors be used to obtain the actual ambient noise level in The Cedars and the other communities and streets in Cedar Ridge. Because of the lack of receptors, additional noise studies and predictions need to be performed for the Cedar Ridge community North of Highway 174.

Ind 49-1

Clearly, the study has ignored the Cedar Ridge area. There were zero Noise and Vibration Measurements performed between the mine and our home (Figure 4.10-3) in the report.

I ask that before any approval be granted for starting up the mine, that additional studies are performed to determine what the noise and vibration will likely be in The Cedars and Cedar Ridge. Excessive sound and vibration will cause serious health issues for us living in Cedar Ridge. Excessive sound and vibration would additionally create a significant loss of wealth for everyone living in the area from the loss of property values.

I want these comments to be seriously considered and acknowledged by Nevada County. If excessive sound and vibration occur from the mine project without additional Noise, Vibration Measurements and Analysis being performed, and appropriate mitigation implemented, this is notice to Nevada County for any and all legal action that anyone may make against the Rise Gold project and/or Nevada County.

Respectively submitted,

1

Barney Dewey

barney@deweys.org
13035 Somerset Drive
Grass Valley, CA 95945

INDIVIDUAL LETTER 49: BARNEY DEWEY

Response to Comment Ind 49-1

The commenter requests that noise measurements are taken at additional locations between the Brunswick Industrial Site and the Cedars Ridge neighborhood, located to the southwest, to more accurately determine the ambient noise levels in that area. The commenter also states that DEIR inadequately addressed the Cedar Ridge area. Note that the commenter mistakenly uses the term noise receptor when referring to noise measurement locations. Noise receptors are uses exposed to noise from project implementation, such as a residence or business.

The project Noise and Vibration Study (see DEIR Appendix L) explains the methods used for selecting the sensitive receptors analyzed in the study (shown on DEIR Figure 4.10-2) and for selecting ambient noise and vibration measurement sites (shown on DEIR Figure 4.10-3). As described on page 6 of DEIR Appendix L, rather than take noise measurements at every receptor in the project area, measurement locations were carefully selected to represent multiple similar receptors at the closest location to the project site to represent worst-case scenario noise levels. Noise data collected at measurement location 4 was extrapolated to represent ambient noise conditions at multiple sites located south of the Brunswick Industrial Site, including receptor 30. The DEIR concludes that noise produced from the operations at the Brunswick site would be less than significant after mitigation. (DEIR, p. 4.10-31.)

Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

Individual Letter 50

From: Becky Smith <beck1155@sbcglobal.net>
Sent: Wednesday, March 30, 2022 10:04 AM
To: Idaho MMEIR
Subject: Fwd: Mine

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Sent from my iPad

Begin forwarded message:

From: Becky Smith <beck1155@sbcglobal.net>
Date: March 30, 2022 at 10:02:26 AM PDT
Cc: heidi.hall@co.nevada.ca.us
Subject: Mine

I oppose the reopening of the mine. We already have water issues in Nevada County. People losing their wells would catastrophic! In addition, the noise , the traffic and our wonderful community will be negatively impacted.

Ind 50-1

Sincerely,
Becky Smith
13017 Pine Tree Pl
Nevada City

Sent from my iPad

INDIVIDUAL LETTER 50: BECKY SMITH

Response to Comment Ind 50-1

Please see Master Responses 1 and 14.

Individual Letter 51

From: Ben Preston <obamabanjo@gmail.com>
Sent: Monday, April 4, 2022 4:37 PM
To: Idaho MMEIR
Subject: opposition to the proposed mine

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April 3, 2022
Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelly,
I am writing to express my opposition to the proposed mine. Mining was once the major industry of our area but those days are long gone and good riddance.

Ind 51-1

Rise Gold has a well-documented and long history of being irresponsible to their communities. Is it not clear by now that the health of our environment is essential to our quality of life as well as the health of our economy? Rise Gold's plans jeopardize both at a critical time when we are dealing with issues of smoke, fire and drought that are beginning to affect our economy and way from our area.

Why take the risk of the consequences of their business plans for so limited a benefit to our community? Do the responsible thing and protect our community from this haphazard and ill-conceived plan.

Sincerely,
Ben Preston

1

INDIVIDUAL LETTER 51: BEN PRESTON

Response to Comment Ind 51-1

Please see Master Responses 1 and 3.

Individual Letter 52

Dist 2

February 21, 2022
Grass Valley, CA 95945

RECEIVED
MAR 0 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
Eric Rood Administrative Center
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Ind 52-1 Dear Supervisors Susan Hoek, Chair, Heidi Hall, Ed Scofield, Dan Miller, Hardy Bullock:

While I appreciate the large quantity of letters and DEIR comments you are receiving, I think it necessary to envision what this summer is likely to be like. Long periods of choking smoke, unusual heat waves and a severe drought will be a backdrop for your County business at hand. Despite this, Rise Gold will continue do everything in their power to reopen the Idaho-Maryland Mine.

Ind 52-2 Meanwhile, fire insurance rates are becoming painful and insurance policies are being canceled as fire season extends to almost year-round. Your constituency knows that catastrophic forest fires could come at any time. Our air quality is being labeled as unacceptable more days every year. You may have to deal with restrictions on water use, maybe even rationing. Reopening the Idaho-Maryland Mine would only make these unacceptable conditions worse.

Ind 52-3 At least Nevada County has had the foresight to adopt the Nevada County Energy Action Plan, developed by the Sierra Business Council with support from PG&E in collaboration with your staff and community members.

Ind 52-4 We must also help mitigate the local dangers of climate change by reducing our air as well as water pollution. The Nevada County Energy Action Plan calls for reducing annual residential electric use by 12 percent which will help. **Rise Gold's planned electrical use would cancel this goal by annually using 12 percent of our County's total electricity**, equivalent to 5,000 new homes.

Ind 52-5 Despite Rise Mine's claims, they will have massive carbon emissions caused by diesel-powered heavy equipment used for: increased new diesel truck traffic (up to 100 round trips a day, seven days a week, 16 hours a day), constant construction during the first year and half; ongoing continuous excavating, underground blasting, drilling, rock crushing, loading, hauling, unloading, spreading, and compacting to create engineered fill up to seven stories tall; continuous mine dewatering by pumping, treating and sending millions of gallons of wastewater down Wolf Creek. These emissions would result in significant *increases* of greenhouse emissions rather than *decreases* planned in the county's Energy Action Plan.

Ind 52-6 Please, let's stop using your time and ours by seriously considering reopening

1

the Idaho-Maryland Mine. Everyone I know is opposed to this project and we will fight Rise Mine's false claims and paid supporters as long as it takes.

Sincerely,

Bernell S. Scott

BERNELL S. SCOTT

Signature, Name and **address**

559 EGRATON CIRCLE

GRASS VALLEY CA 95945

CC: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Ave., Suite 170
Nevada City, CA 95959

Idaho.MMEIR@co.nevada.ca.us

2

INDIVIDUAL LETTER 52: BERNELL SCOTT

Response to Comment Ind 52-1
Please see Master Response 1.

Response to Comment Ind 52-2
Please see Master Response 1. In addition, impacts related to wildfire are addressed in Chapter 4.13, Wildfire, of the DEIR, as well as Master Response 6. Furthermore, see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for concerns related to air quality, as well as Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, regarding water supplies.

Response to Comment Ind 52-3
The comment expresses a general opinion in support of the Nevada County Action Plan, but does not provide specific examples that would allow for a detailed response.

Response to Comment Ind 52-4
Please see Master Response 25.

Response to Comment Ind 52-5
Impacts related to Greenhouse Gas Emissions are presented in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. As noted under Impact 4.3-7, with the implementation of mitigation, the proposed project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable.

Response to Comment Ind 52-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 53

February 21, 2022
Grass Valley, CA 95945



Nevada County Board of Supervisors
Eric Rood Administrative Center
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Dear Supervisors Susan Hoek, Chair, Heidi Hall, Ed Scofield, Dan Miller, Hardy Bullock:

Ind 53-1 While I appreciate the large quantity of letters and DEIR comments you are receiving, I think it necessary to envision what this summer is likely to be like. Long periods of choking smoke, unusual heat waves and a severe drought will be a backdrop for your County business at hand. Despite this, Rise Gold will continue do everything in their power to reopen the Idaho-Maryland Mine.

Ind 53-2 Meanwhile, fire insurance rates are becoming painful and insurance policies are being canceled as fire season extends to almost year-round. Your constituency knows that catastrophic forest fires could come at any time. Our air quality is being labeled as unacceptable more days every year. You may have to deal with restrictions on water use, maybe even rationing. Reopening the Idaho-Maryland Mine would only make these unacceptable conditions worse.

Ind 53-3 At least Nevada County has had the foresight to adopt the Nevada County Energy Action Plan, developed by the Sierra Business Council with support from PG&E in collaboration with your staff and community members.

Ind 53-4 We must also help mitigate the local dangers of climate change by reducing our air as well as water pollution. The Nevada County Energy Action Plan calls for reducing annual residential electric use by 12 percent which will help. **Rise Gold's planned electrical use would cancel this goal by annually using 12 percent of our County's total electricity**, equivalent to 5,000 new homes.

Ind 53-5 Despite Rise Mine's claims, they will have massive carbon emissions caused by diesel-powered heavy equipment used for: increased new diesel truck traffic (up to 100 round trips a day, seven days a week, 16 hours a day), constant construction during the first year and half; ongoing continuous excavating, underground blasting, drilling, rock crushing, loading, hauling, unloading, spreading, and compacting to create engineered fill up to seven stories tall; continuous mine dewatering by pumping, treating and sending millions of gallons of wastewater down Wolf Creek. These emissions would result in significant *increases* of greenhouse emissions rather than *decreases* planned in the county's Energy Action Plan.

Ind 53-6 Please, let's stop using your time and ours by seriously considering reopening

1

the Idaho-Maryland Mine. Everyone I know is opposed to this project and we will fight Rise Mine's false claims and paid supporters as long as it takes.

Sincerely,

Bernell S. Scott

BERNELL S. SCOTT

Signature, Name and address

588 ESKATON CIRCLE

GRASS VALLEY CA 95945

CC: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Ave., Suite 170
Nevada City, CA 95959

idaho.MMEIR@co.nevada.ca.us

2

INDIVIDUAL LETTER 53: BERNELL SCOTT

Response to Comment Ind 53-1
Please see Master Response 1.

Response to Comment Ind 53-2
Please see Master Response 1. In addition, impacts related to wildfire are addressed in Chapter 4.13, Wildfire, of the DEIR, as well as Master Response 6. Furthermore, see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for concerns related to air quality, as well as Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, regarding water supplies.

Response to Comment Ind 53-3
The comment expresses a general opinion in support of the Nevada County Action Plan, but does not provide specific examples that would allow for a detailed response.

Response to Comment Ind 53-4
Please see Master Response 25.

Response to Comment Ind 53-5
Impacts related to Greenhouse Gas Emissions are presented in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. As noted under Impact 4.3-7, with the implementation of mitigation, the proposed project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable.

Response to Comment Ind 53-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 54

From: bernie zimmerman <berniez46@gmail.com>
Sent: Sunday, January 23, 2022 7:51 AM
To: Idaho MMEIR
Subject: Randall J. Newsome: Rise Gold, show me the money | TheUnion.com

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Ind 54-1

This piece appeared in the Union A few days ago. I think it makes some good points and should be made part of the record for your review of the draft EIR.
https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.theunion.com%2fopinion%2fcolumns%2frandall-j-newsome-rise-gold-show-me-the-money%2f&c=E,1,gNrqJuUcIAgjiq0PuaT3TVBCjqZEvYu_K3w_nBqDp1NZVhXAtn_AMmCxepfYI1VFOPSpA-97XQH5IaMt4Ip1-kMqw_qlvYfISGg_RLsb6C4TrR02HSux7x5nYT0,&typo=1

Bernie Zimmerman

INDIVIDUAL LETTER 54: BERNIE ZIMMERMAN

Response to Comment Ind 54-1

The referenced article refers to the Project Applicant's financial wherewithal to complete the proposed project, which is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Individual Letter 55

From: Bert D. Heinzelman <bheinzelman@comcast.net>
Sent: Monday, March 28, 2022 3:54 PM
To: Idaho MMEIR
Subject: Objection to the Proposed Idaho-Maryland Mine Project

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Ind 55-1

To Whom it May Concern,

Please be advised that Helena & Bert Heinzelman residing at 11627 Thomas Ranch Circle, Nevada City, CA 95959, are strongly APPOSED to the proposed Idaho-Maryland Mine Project. We believe the project and proposed operation of the mine will have detrimental environmental impacts on our community and will negatively affect values and marketability of properties in our area. In addition, we DO NOT believe the mine's operation will contribute significant economic benefits to the county as claimed by the sponsor of the project.

NO MINE!

Sincerely,
Bert Heinzelman

This email has been checked for viruses by Avast antivirus software.
www.avast.com

INDIVIDUAL LETTER 55: BERT HEINZELMAN

Response to Comment Ind 55-1

Please see Master Responses 1 and 2.

Individual Letter 56

Ind 56-1

Dist 3

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the reopening of the Idaho-Maryland Mine.

I OPPOSE THE MINE

RECEIVED
FEB 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) BETTY PEARSON

Address 871 MORGAN RANCH DR.

Phone GRASS VALLEY, CA 95945

Email Address bettyp232@gmail.com

ZIP

INDIVIDUAL LETTER 56: BETTY PEARSON

Response to Comment Ind 56-1

Please see Master Response 1.

Individual Letter 57

From: Beverly Martling
To: bdofsupervisors
Subject: Rise Grass Valley
Date: Thursday, February 24, 2022 1:38:09 PM

Dist 2

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Supervisor Scofield

I am not a person who writes to my elected officials on a regular basis but I feel compelled to do so now. I am 100% against reopening the Idaho Maryland Mine.

How can this even be a consideration when we are going through another drought? To pump water from the mine, lowering the water table, sending that polluted water into Wolfe Creek with arsenic and other contaminates in it is unthinkable. If Rise Grass Valley pollutes our water and air, does the county have in place the ability to stop their actions and make them clean it up or fine them? And how much will this cost in taxes to county residents? Mr. Mossman does not have a good track record. I'm sure you're aware of his mining history in Canada. I don't want my county polluted to put money in the pockets of an out of country business.

Rise Grass Valley lies, touts high paying jobs for locals. Would you want your children or grandchildren working as a miner underground?

Ind 57-1

Then there is air and noise pollution. Also huge trucks hauling waste away on our roads that are not in great condition now and this will continue for 80 years.

Our area and tourism are known for its beauty and rural atmosphere not heavy industry. It kind of makes a mockery of our Wild and Scenic Film Festival.

If some county residents were so concerned about opening a Wendy's fast-food restaurant, imagine the negative opinions on reopening a heavy industry mine.

Please, no on reopening this mine. It is a lose, lose situation that will last a generation.

Beverly Martling
16726 Alexandra Way
Grass Valley

Sent from my iPad

INDIVIDUAL LETTER 57: BEVERLY MARTLING

Response to Comment Ind 55-1

Please see Master Responses 1, 2, 3, 16, and 35.

Individual Letter 58

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: BEVERLY STOUT

Address: 312 Horizon Circle GV

Organization (if applicable): —

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

I CAN'T UNDERSTAND WHY THE SUPERVISORS WOULD EVEN BE CONSIDERING A PROJECT WITH THIS COMPANY THAT HAS SUCH A POOR REPUTATION FOR PRIOR WORKS. THEY WERE UNTRUTHFUL IRRESPONSIBLE AND WALKED AWAY FROM THEIR RESPONSIBILITIES IN CANADA, LEAVING A MESS BEHIND.

THE ADVERTISING THEY HAVE DONE SO FAR ONLY HARDENS MY ANIMOSITY TOWARDS THEM. I WAS A RECIPIENT OF THEIR PHONE SURVEY, WHICH I CONSIDER QUITE BIASED AND DESIGNED TO PROVIDE ONLY POSITIVE ANSWERS. QUESTIONS LIKE IF WE DO THIS AND SO ALL PROBLEMS WILL BE MITIGATED. WHAT ABOUT IF THEY DON'T?

Ind 58-1

WITH COVID I AM OF COURSE CONCERNED ABOUT LOWER AIR QUALITY. AS TO THE WATER REQUIRED TO WORK A MINE, WHY ARE WE EVEN CONSIDERING THIS IN A COMMUNITY ALREADY PLAGUED BY DROUGHT AND FIRE; AND ALREADY RATIONING WATER USE??? NO.

TRAFFIC & ROAD WEAR & TEAR ARE ALSO CONCERNS

INDIVIDUAL LETTER 58: BEVERLY STOUT

Response to Comment Ind 58-1

Please see Master Responses 1, 3, and 16.

Individual Letter 59

April 3, 2022

Bill Lawrence
10201 Ridgeview Dr.
Grass Valley, CA 95945

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423 Email: Idaho.MMEIR@co.nevada.ca.us

Dear Sir:

Please accept the following comments on the Draft Environmental Impact Report for the Idaho Maryland Mine.

Chapter 1.4

Ind 59-1 It appears from the draft DEIR that Rise Gold could commence operations without using the Centennial site. It also implies that mining operations could proceed for some years without ever utilizing the Centennial site. Why isn't there a deadline date for the voluntary cleanup of the Centennial site? What assurances does Nevada County have that Rise Gold will clean up the site to the standards set by the Department of Toxic Substance Control?

Chapter 4.7 Use and Storage of Various Chemicals

Ind 59-2

1. There is no detailed description of the various processes used to recover the gold from the ore mined on the Brunswick site.

Ind 59-3

2. There is little mention of what is processed on site versus off-site. Are all processes completed on impermeable surfaces with secondary containment to ensure no contamination of surrounding ground?

Ind 59-4

3. A detailed description of the gold recovery processes including all chemicals utilized such Magnafloc10, methyl isobutyl carbinol (MIBC), soda ash, and Aerophine is needed. No material safety data sheets are provided for these materials. There are only references to "low potential for bioaccumulation" and "relatively non-toxic". There is no mention of the volumes of these materials that will be located on-site.

Ind 59-5

4. Are there other hazardous or toxic chemicals used in these recovery steps? This report must show a **flow chart** beginning with delivery to the storage areas showing secondary containment of the chemical vessels (55 gallon drums or large tank) and continuing to the separation process and removal of materials from the Brunswick site.

Ind 59-6

5. There is no mention of any hazardous wastes that may be generated during the gold recovery process.

Ind 59-7

6. Any hazardous materials that become airborne need to be documented and mitigation measures identified.

Ind 59-8

7. Wastes generated that are solid in nature need to be identified, characterized and methods used to manage these waste needs to be mentioned.

Ind 59-9

8. Liquid wastes generated during the gold recovery process are not identified. Management of these wastes is not discussed.

Ind 59-10

Chapter 4.10 Noise and Vibration. This chapter addresses the impacts of noise and vibration upon the environment (community) surrounding the Brunswick site but does not mention the impact of noise and vibration on individuals working at the Brunswick site. There is also no mention of occupational health and safety impacts upon the deep mine workers who spend many hours in a cold and wet environment. It is well documented that such workers experience high rates of respiratory disease and skin infections.

General comments on Draft Environmental Impact Report for Rise Gold

Ind 59-11

1. Why is treated water from the mine shaft dewatering sent to South Fork of Wolf Creek when there might be other uses of this water? Are there assurances that only water from the mine shafts will be sent to the creek? What is the frequency of testing of this water to be sent to Wolf Creek?

Ind 59-12

2. Rise Gold has indicated that there may be local markets for the engineered fill from the mining. There is no mention of the frequency of testing this material to ensure that it meets state standards for use in various commercial applications.

INDIVIDUAL LETTER 59: BILL LAWRENCE

Response to Comment Ind 59-1
The commenter states that the DEIR indicates the project could commence without the completion of the cleanup action at the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 59-2
The commenter states that the DEIR does not describe the mineral processing to recover the gold. Mineral processing is described on page 3-25 and page 4.8-46 of the DEIR.

Response to Comment Ind 59-3
All mineral processing proposed by the project is done on-site inside of the enclosed mineral process plant building as described on page 3-25 of the DEIR. Certain thickening and stock tanks are located outside of the building, on paved impermeable surface and with secondary containment where necessary as discussed on page 3-26 and shown in Figure 3-8 of the DEIR.

Response to Comment Ind 59-4
The commenter states that the DEIR lacks a detailed description of the types and volumes of chemicals required for the project's mineral processing. The details of volumes of reagents located on-site are not required for the analysis of the DEIR and further, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.). As stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site. The commenter is also referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 59-5
The commenter states that the DEIR must show a flow chart of the mineral processing by stages. A flow chart of delivery to storage areas and details of storage of mineral processing reagents are not required for the analysis of the DEIR and further, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.). As stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site. The commenter is also referred to Response to Comment Ind 59-4 regarding mineral processing reagent type and quantities.

Response to Comment Ind 59-6
The commenter states that the DEIR does not disclose whether mineral processing will produce any hazardous wastes. No hazardous wastes are generated during the gold recovery process. In regard to mine waste (barren rock and sand tailings), the commenter is referred to Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 59-7
The commenter states that the DEIR must account for any hazardous materials that become airborne. All toxic air contaminants have been evaluated in the Health Risk Assessment and

analysis of the DEIR. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Appendix E.1 of the DEIR.

Response to Comment Ind 59-8

The commenter states that the DEIR must identify and manage any solid wastes produced by the project. The commenter is referred to Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 59-9

The commenter states that the DEIR fails to identity liquid wastes produced during mineral processing. As stated on page 3-26 of the DEIR, the process plant is a closed loop system. The commenter is referred to Response to Comment Ind 59-4.

Response to Comment Ind 59-10

Occupational (worker) health and safety in mines is governed the US Mine Safety and Health Administration (MSHA). The applicant is required by federal law to obtain a MSHA mine ID number and to comply with MSHA safety regulations. The DEIR appropriately evaluates the environmental impact of the project on the surrounding environment and health impacts to the surrounding public and is not required to perform an analysis of on-site workers and the adequacy of MSHA regulations. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (CCR Title 14 Section 15126.4).

Response to Comment Ind 59-11

The commenter asks if the treated water to be discharged to South Fork Wolf Creek could have a more beneficial use and how frequent the water testing will occur. As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to.

Treated mine water would be discharged to South Fork Wolf Creek and site run-off would also be discharged to South Fork Wolf Creek. The frequency of water testing would be determined in the Notice of Applicability. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 59-12

Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Individual Letter 60

From: Bishop Randall <mantisglass33@gmail.com>
Sent: Sunday, April 3, 2022 7:43 AM
To: Idaho MMEIR
Subject: Comments on DEIR

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To whom it may concern,

"In order to arrive at what you do not know You must go by a way which is the way of ignorance. T. S. ELIOT, "EAST COKER"

OUR PURPOSE HERE is to worry about the predominance of the supposition, in a time of great technological power, that humans either know enough already, or can learn enough soon enough, to foresee and forestall any bad consequences of their use of that power. This supposition is typified by Richard Dawkins's assertion, in an open letter to the Prince of Wales, that "our brains...are big enough to see into the future and plot long-term consequences."

Ind 60-1

When we consider how often and how recently our most advanced experts have been wrong about the future, and how often the future has shown up sooner than expected with bad news about our past, Mr. Dawkins's assessment of our ability to know is revealed as a superstition of the most primitive sort. We recognize it also as our old friend hubris, ungodly ignorance disguised as godly arrogance. Ignorance plus arrogance plus greed sponsors "better living with chemistry," and produces the ozone hole and the dead zone in the Gulf of Mexico. A modern science (chemistry or nuclear physics or molecular biology) "applied" by ignorant arrogance resembles much too closely an automobile being driven bya sixyear-old or a loaded pistol in the hands of a monkey. Arrogant ignorance promotes a global economy while ignoring the global exchamge of pests and diseases that most inevitably accompany it. Arrogant ignorance makes war without a thought of peace.

We identify arrogant ignorance by its willingness to work on too big a scale, and thus to put too much at risk. It fails to foresee bad consequences not only because some of the consequences of all acts are inherently unforeseeable, but also because the arrogantly ignorant often are blinded by money invested; they cannot afford to foresee bad cconsequences."

-Wendell Berry

This (report) is riddled with errors, omissions, and legal flaws.

Ind 60-2

Recently CEA Foundation and its MineWatch coalition members on Wednesday delivered comments to the Nevada County Planning Commission on the draft environmental impact report for the proposed reopening of the Idaho-Maryland Mine, a news release states.

Experts, volunteers, and legal minds reviewed the report's 1,000-plus pages to provide a review of the technical studies, impact assessments and proposed mitigations.

1

"Mining is our past, not our future," said retired capital planner Paul Schwartz in the release. "Today's economic engine is recreation-based, but we're also facing historic drought and fire risk. Protecting precious resources like water, air quality, and our peaceful rural setting is job number one."

Rise Gold Corp., was responsible for delivering the vast majority of the technical studies used by the county's hired consultant to determine the impacts.

Dewatering the mine is a key concern

"Groundwater modeling in fractured rock systems is considered unreliable even when everything is done right,"

Rise Gold's model has fundamental flaws in the initial start point of the model and baseline data assumptions — all of which throw off the entire analysis. The result is a report that concludes that groundwater levels would drop a maximum of 10 feet, and no more than 30 local wells would be a risk.

CEA's experts, however, say there is an extremely high degree of uncertainty involved. (Siskon mine being an example)

OTHER CONCERNS

Dealing with mine waste is another major concern.

Ind 60-3

"Looking at the rock core sample analysis, it is abundantly clear that asbestos will be a gnarly problem that will require comprehensive management. Mining operations don't get to just haul and dump rock like the days of old," said Silberstein. "Air and water quality regulations will significantly restrict throughput and the costs will be exorbitant."

Ind 60-4

CEA's experts found the plans to mitigate fugitive dust to be inadequate. They also found no credible evidence that the mine tailings could be effectively sold to third parties for fill or off-site construction.

Ind 60-5

Climate change has increased forest fires and parched lands, resulting in the newest federal and state greenhouse gas reduction goals. The report used a threshold of 10,000 metric tons per year for greenhouse gas emissions, but failed to include some elements that put the project over that limit and make it a significant impact.

That limit defined in the report is likely to be found irrelevant, CEA claims. Recent changes mean the county's threshold must be established at "net zero."

Ind 60-6

CEA also said gaps in the report include the clean up of the toxic, pre-superfund Centennial site that would be used to dump mine waste and is not included in the report, but is required by the California Environmental Quality Act; missing construction time estimates throwing off the entire analysis of noise, traffic, and air; and the incorrect assessment of nighttime noise, and underestimation of the noise of dumping mine waste near established residential neighborhoods.

2

Ind 60-7

Additionally, air traffic hazards and aesthetic impacts need to be studied further due to the likelihood of a massive fog plume that could be created by warm, saturated air ventilation; blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours; the plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant; and meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.

Ind 60-8

Given these many concerns and history regarding Rise Gold Co, I Bishop (Brian) Randall request BOS deny their permit to reopen the Idaho Maryland Mine.

Yrz,

B. Randall

INDIVIDUAL LETTER 60: BISHOP RANDALL

Response to Comment Ind 60-1
Please see Master Response 1.

Response to Comment Ind 60-2
Section 15151 of the CEQA Guidelines (and related judicial opinions) directs that in situations where there is a disagreement between experts, the EIR should summarize the main points of disagreement for consideration by the Board in reaching its decision. Disagreements between experts do not preclude the process from moving forward, nor do they preclude the Board from considering the evidence and making its decision(s). Please see Master Response 14 regarding the adequacy of the groundwater model.

Response to Comment Ind 60-3
Please see Master Response 8 and 22.

Response to Comment Ind 60-4
The comment provides general comments that lack the specificity to formulate a specific response to the claims of inadequacy. Fugitive dust was addressed in Chapter 4.3 of the DEIR with substantial evidence to support the conclusions included in Appendix E.1 of the DEIR. See also Master Response 3 regarding changes in circumstances under which the permit is granted.

Response to Comment Ind 60-5
Please see Master Response 27.

Response to Comment Ind 60-6
Please see Master Response 4.

Response to Comment Ind 60-7
The comment does not provide substantial evidence to support that significant additional fog formation as compared to existing conditions would be a reasonably foreseeable outcome from operation of the proposed project. Even if fog formed from the project, pilots and air traffic controllers are trained to safely operate during all natural weather patterns, such as fog. Therefore, the phenomenon of fog is not considered an “air traffic hazard” as claimed by the commenter. The DEIR does however address potential impacts related to the Nevada County Air Park being within one mile of the Brunswick Industrial Site. As noted in the DEIR, the proposed project would be required to be reviewed by the Airport Land Use Commission. In addition, fog is not considered an aesthetic impact pursuant to the standards of significance used in the DEIR by the County (please refer to page 4.1-11 of the DEIR).

Please see Master Response 1. Potential impacts from proposed blasting (particularly noise and vibration) are addressed throughout the DEIR, and noise and vibration from blasting is addressed in Chapter 4.10. Impacts related to biological resources, including aquatic features, is addressed in Chapter 4.4. See also Master Response 17.

Response to Comment Ind 60-8
Please see Master Responses 1 and 3.

Individual Letter 61

From: Bj Flint
To: bdofsupervisors
Cc: Bj Flint
Subject: NO MINE
Date: Friday, February 18, 2022 12:17:38 PM

Dist 4

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Dear Supervisors:
I understand there is not an official way presently, to oppose Rise Gold's intention to open the Idaho Maryland mine again.
I have done a lot of research regarding this matter and have come to the overwhelming conclusion that it is a very bad idea. I could go on and on about the reasons and I am sure you know what they are.
I just want to inform you that we do not want the mine reopened. The possible environmental impact is just too great.

Ind 61-1

Thank you and have a great day. A nice quiet, peaceful day filled with clean air and water and plenty of electricity for all. Go mingle with the locals, they are great people, who really appreciate what we have here in Nevada County.

BJ Flint
Disability Benefits
Accredited Social Security Disability Representative, EDPNA Approved
20902 Big Spring Drive
Grass Valley, CA 95949
FAX: 1 (866) 264-8797
email: gbjflint@netscape.net

INDIVIDUAL LETTER 61: BJ FLINT

Response to Comment Ind 61-1

Please see Master Response 1.

Individual Letter 62

March10, 2022

Mr. Matt Kelly, Sr Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Email: idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Mr. Kelly:

The co-signers of this letter belong to a group of people in Nevada County called the RRRs. We are constituents of County Districts 2, 3, and 4, and our mission includes expression of our collective position on issues involving the county. We value our quality of life here and strive to educate and/or influence our neighbors to support these chosen issues.

We write as a collective at this time to strongly oppose reopening the Idaho-Maryland Mine and request that the comments expressed here be included in the decision-making on the draft EIR on the proposed mine.

Ind 62-1

We are requesting a 120-day period for comments. A few of us are former federal government employees who have had extensive experience in the public comment process under the National Environmental Policy Act. The proposed reopening of the Idaho Maryland mine is a matter of significant impact. The controversy, economic considerations, water and air quality threats, noise pollution, increase in heavy trucking traffic, etc., are already documented in many comments, news articles and protest demonstrations. These are major impacts which deserve sufficient time for study, research, and consideration by an educated public. Further, because there is no search tool on the website for the draft EIR, one needs to read the full 1,070 page document before concluding whether specific factors are addressed. More time is needed to read.

Ind 62-2

Nevada County's characteristics and demographics have changed since gold mining was halted. The county is now considered one of the most beautiful in the state, treasured for its natural beauty, peaceful lifestyle, and recreational assets. Availability and quality of water is vital and the protection of these resources is one of the most important considerations for us. No further proof of this is needed than the Christmas, 2021, storm and the devastation of drought-stricken trees. It has single-handedly changed the face of the beautiful forested hills of Alta Sierra and the Colfax corridor.

Ind 62-3

To add to our well-documented water problems by allowing a mine to extract even more water would be unconscionable. To use our creeks as flumes for mine waste is unconscionable, too. Hauling away the tons of mine tailings will require 100 trucks a day. A truck every 10 minutes, will be traveling through the heart of greater Grass Valley, impacting the quality of the highways and the community with noise. To allow this to happen is unconscionable. Our quiet foothills communities will be assaulted day and night with loud machinery operating all the time. The loud din of the mine operation will be constantly in our ears.

Ind 62-4

In fact, the EIR does not even factor in the consequences we will face from climate change. This, too, is unconscionable. We support the draft EIR public comment from the California Native Plant Society which understands, too well, the climate change consequences upon our environment. Habitat Management Plans must be developed.

Ind 62-5

We urge you to reject the draft EIR if only for the lack of consideration of the potential for a disaster. We find the draft EIR - chapter 4, section 11, specifically troubling. It finds the mine

to be a less than significant impact on the public services and utilities in the county. It does not address what public services will have to support the mine. Injuries, collapses, and ignitions, among other factors need to be anticipated. Again, the Christmas storm is a wake up call to the entire county about what should be planned for in the event of an emergency. What happens when a major mine emergency requires multi-day support of public services?

Ind 62-6

The draft EIR does not adequately take into consideration the negative impacts of Rise Gold's past poor behavior, failed business, bankruptcies, and financial problems.

The County should not want to partner with such speculative performance. It needs to factor in how such a partnership will affect the Board of Supervisors solid list of identified priorities for fiscal stability, emergency preparedness, economic development, broadband, housing, homelessness, and recreation. The County needs to encourage reliable partners to support living wages for residents. We suggest the mine proposal of Rise Gold will pay living wages to the professional workers it will seek from outside the county. The jobs available to residents seem limited to laborers who may not see living wages allowing them to buy homes and permanence in the county.

The company claims the project will bring economic prosperity to western Nevada County. We call for the analysis of the impacts of a project that, if past is prologue, threatens to turn our area into an abandoned toxic waste dump. We believe it is deceptive to promise jobs and tax revenues that could result in negative impacts by ***reducing*** tourism, due to pollution of our water and air, and ***declining*** property values and tax revenues.

Mining is a dirty business. We find the draft EIR insufficient and strongly urge you to disapprove this project in its entirety. The very destruction of the quality of our County, our properties, our safety, and our peaceful lifestyles is at stake.

Sincerely,

BJ Griffin
Alta Sierra resident, District 2
griffinbj@mindspring.net

Margaret Burks
Jones Bar resident, District 4
peggyburks@gmail.com

Holly Bundock
Lake of the Pines resident, District 2
bundockink@gmail.com

Pat Sharp
City of Grass Valley resident, District 3
patsharpdesigns@hotmail.com

Gayle Crossley
Lake of the Pines resident, District 2
crossley.gayle@gmail.com

GC approved by phone

INDIVIDUAL LETTER 62: BJ GRIFFIN, MARGARET BURKS, HOLLY BUNDOCK, PAT SHARP, AND GAYLE CROSSLEY

Response to Comment Ind 62-1
Please see Master Response 1. With regard to the public comment period for the DEIR, the comment period lasted for 91 days, starting on January 4, 2022 and ending on April 4, 2022.

Response to Comment Ind 62-2
Please see Master Response 1.

Response to Comment Ind 62-3
Please see Response to Comment 1, 8, and 13.

Response to Comment Ind 62-4
Impacts related to climate change are discussed in Chapter 4.3, Air Quality Greenhouse Gas Emissions, and Energy, of the DEIR. In addition, as discussed in Chapter 4.4, Biological Resources, of the DEIR, a Habitat Management Plan was prepared for both the Centennial and Brunswick sites. In addition, Mitigation Measures 4.4-1(b) and 4.4-2(c) would require the preparation of additional Habitat Management Plans for any additional special-status plant and wildlife species identified during pre-construction surveys.

Response to Comment Ind 62-5
As discussed within Chapter 4.11, Public Services, of the DEIR, the chapter identifies potential new demands resulting from the proposed project on various public services and utility systems, including but not limited to fire protection, law enforcement, schools, parks and recreation, water supply, wastewater systems, solid waste disposal, and electrical utilities. As such, public services needed to support the mine were adequately addressed in the DEIR. In addition, Impact 4.7-4 analyzes whether the proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and concluded that the proposed project would have a less-than-significant impact.

Response to Comment Ind 62-6
Please see Master Responses 1, 2, 3, and 8.

Individual Letter 63

RECEIVED
MAR 28 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March10, 2022

Mr. Matt Kelly, Sr Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Email: idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly:

The co-signers of this letter belong to a group of people in Nevada County called the RRRs. We are constituents of County Districts 2, 3, and 4, and our mission includes expression of our collective position on issues involving the county. We value our quality of life here and strive to educate and/or influence our neighbors to support these chosen issues.

We write as a collective at this time to strongly oppose reopening the Idaho-Maryland Mine and request that the comments expressed here be included in the decision-making on the draft EIR on the proposed mine.

Ind 63-1

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Ind 63-2

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Ind 63-3

To add to our well-documented water problems by allowing a mine to extract even more water would be unconscionable. To use our creeks as flumes for mine waste is unconscionable, too. Hauling away the tons of mine tailings will require 100 trucks a day. A truck every 10 minutes, will be traveling through the heart of greater Grass Valley, impacting the quality of the highways and the community with noise. To allow this to happen is unconscionable. Our quiet foothills communities will be assaulted day and night with loud machinery operating all the time. The loud din of the mine operation will be constantly in our ears.

Ind 63-4

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Ind 63-5

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The draft EIR does not adequately take into consideration the negative impacts of Rise Gold's past poor behavior, failed business, bankruptcies, and financial problems.

Ind 63-6

The County should not want to partner with such speculative performance. It needs to factor in how such a partnership will affect the Board of Supervisors solid list of identified priorities for fiscal stability, emergency preparedness, economic development, broadband, housing, homelessness, and recreation. The County needs to encourage reliable partners to support living wages for residents. We suggest the mine proposal of Rise Gold will pay living wages to the professional workers it will seek from outside the county. The jobs available to residents seem limited to laborers who may not see living wages allowing them to buy homes and permanence in the county.

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Mining is a dirty business. We find the draft EIR insufficient and strongly urge you to disapprove this project in its entirety. The very destruction of the quality of our County, our properties, our safety, and our peaceful lifestyles is at stake.

Sincerely,

BJ Griffin
Alta Sierra resident, District 2
griffinbj@mindspring.net

Margaret Burks
Jones Bar resident, District 4
peggyburks@gmail.com

Holly Bundock
Lake of the Pines resident, District 2
bundockink@gmail.com

Pat Sharp
City of Grass Valley resident, District 3
patsharpdesigns@hotmail.com

Gayle Crossley
Lake of the Pines resident, District 2
crossley.gayle@gmail.com

INDIVIDUAL LETTER 63: BJ GRIFFIN, MARGARET BURKS, HOLLY BUNDOCK, PAT SHARP, AND GAYLE CROSSLEY

Response to Comment Ind 63-1
Please see Master Response 1. With regard to the public comment period for the DEIR, the comment period lasted for 91 days, starting on January 4, 2022 and ending on April 4, 2022.

Response to Comment Ind 63-2
Please see Master Response 1.

Response to Comment Ind 63-3
Please see Response to Comment 1, 8, and 13.

Response to Comment Ind 63-4
Impacts related to climate change are discussed in Chapter 4.3, Air Quality Greenhouse Gas Emissions, and Energy, of the DEIR. In addition, as discussed in Chapter 4.4, Biological Resources, of the DEIR, a Habitat Management Plan was prepared for both the Centennial and Brunswick sites. In addition, Mitigation Measures 4.4-1(b) and 4.4-2(c) would require the preparation of additional Habitat Management Plans for any additional special-status plant and wildlife species identified during pre-construction surveys.

Response to Comment Ind 63-5
As discussed within Chapter 4.11, Public Services, of the DEIR, the chapter identifies potential new demands resulting from the proposed project on various public services and utility systems, including but not limited to fire protection, law enforcement, schools, parks and recreation, water supply, wastewater systems, solid waste disposal, and electrical utilities. As such, public services needed to support the mine were adequately addressed in the DEIR. In addition, Impact 4.7-4 analyzes whether the proposed project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and concluded that the proposed project would have a less-than-significant impact.

Response to Comment Ind 63-6
Please see Master Responses 1, 2, 3, and 8.

Individual Letter 64

March 31, 2022

Matt Kelley, Senior Planner Nevada County Planning Department

Ind 64-1

We wish to state that the Idaho-Maryland Mine project should not be approved.

The pumping of water from the mine has to many risks. The increased traffic from trucks would be horrible for people now living in the area. Plus there is a large housing project starting that is very close to the mine. People will not want to live that close to the project.

Mining was our pass and does not need to be our future.

Bob Larimer Bob Larimer

Betty Larimer
Betty Larimer

16092 Janet Way, Grass Valley, 95949

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 64: BOB AND BETTY LARIMER

Response to Comment Ind 64-1

Please see Master Response 1.

Individual Letter 65

From: Ed Scofield
To: Julie Patterson-Hunter
Subject: FW: ID-MD Mine
Date: Monday, February 28, 2022 10:26:41 AM

Dist 2

From: Bob and Kay <zbobk@hotmail.com>
Sent: Sunday, February 27, 2022 2:10 PM
To: BOS Public Comment <BOS.PublicComment@co.nevada.ca.us>
Cc: Ed Scofield <Ed.Scofield@co.nevada.ca.us>
Subject: ID-MD Mine

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Nevada County Board of Supervisors: 2-27-2022

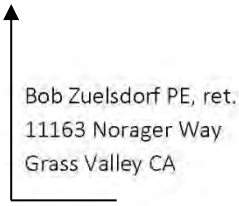
Once again a foreign company is attempting to open the Idaho Maryland Mine, the 3rd time I have seen this "once every decade" fiasco occur. Once again it is being portrayed as *beneficial to our community.* Another attempt to translate the now faded glory of the 1800's and early 1900's into today's very different world, it merely sucks up time and money from the county and local residents, rather than living up to the fables Rise Gold portrays. It is uncertain if they actually would resurrect the mine, or are simply hyping up the prospect to gather in money from stockholders to feather their nest – and bank accounts – before fading into the woodwork with the funds, as has happened before.

Ind 65-1

It is the wrong business at the wrong time and these new "mine owners" are once again putting their own benefits ahead of the needs and desires of this community. Yes, one can slant the numbers to show widespread support for another environmental disaster such as they have caused in in Canada, and are still in defensive litigation about for unmitigated environmental damage. A heavy trucking, noisy, air fouling industry is far from being in the best interests of the Grass Valley area. And if there is such widespread support as they claim, why is The Union filled with letters from those in opposition with most of the meager support coming from those with vested interests in the mine?

What the area does need is more of the High Tech industries such as were exemplified by Grass Valley Group and others, with that legacy now being carried on by the likes of Telestream and AJA Video and being supported by Training Programs such as those at Nevada County Media. Greater emphasis on the clean, well paying jobs they provide would be far more beneficial to the residents of Grass Valley, Nevada City and the rest of Nevada County.

Ind 65-2


Bob Zuelsdorf PE, ret.
11163 Norager Way
Grass Valley CA

INDIVIDUAL LETTER 65: BOB ZUELSDORF

Response to Comment Ind 65-1

Please see Master Responses 1 and 3.

Response to Comment Ind 65-2

Please see Master Responses 1. The commenter's concerns regarding increased clean, well-paying jobs in the area is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 66

Dist 4

RECEIVED

MAR 0 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Planning Commission
950 Maidu Ave, Suite 170
Nevada City, CA 95959

February 28, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno

Ind 66-1 I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have read the Rise Gold Mine postcards they sent recently. The information is misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project at the detriment of our community.

Ind 66-2 Gold mining is the world's worst business. It's capital-intensive. It's labor-intensive. Gold miners are ultra-sensitive to movements in the price of gold. When gold moves higher a gold mining company can get capital. When it moves lower, and the investors had enough with the industry they leave and find another opportunity. The 2013-2019 downturn in gold prices was the final straw for many investors. And companies like Rise Gold had little ability to raise money to run the business. Rise Gold is a bit player in the industry. They won't be around when gold plunges.

Ind 66-3 They won't be around to clean up the toxic waste. They will go bankrupt and leave California and go back to Canada where they are well protected.

I have been a Nevada County resident since 2005 and see that Rise Gold wants to risk our environment and the people who live here for their profit. I am confident that you will value my input and comments and the comments from thousands of other residents. I hope all of you will be on the right side of history and protect our community from fraudsters like Rise Gold Mine.

Ind 66-4

Thank you,
Bonnie Lynn Murphy

11202 Oak Canyon Drive
Penn Valley, CA 95946
916-397-5443

INDIVIDUAL LETTER 66: BONNIE MURPHY

Response to Comment Ind 66-1
Please see Master Response 1.

Response to Comment Ind 66-2
The commenter's concerns regarding the gold mining industry is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 66-3
Please see Master Response 3.

Response to Comment Ind 66-4
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 67

From: Brandon Butrick <brandon@photoncreative.com>
Sent: Tuesday, March 29, 2022 1:18 PM
To: Idaho MMEIR
Subject: REJECT the Rise Gold proposal to re-open the Idaho Maryland Mine

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From the desk of:
Brandon Butrick
13186 Nob Hill
Nevada City, CA 95959

To:
Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us

Dear and Board of Supervisors and County Planners,

I understand you're still considering the Rise Gold proposal to reopen the Idaho-Maryland Mine. Are you kidding?

No. No. No. No. No.

Ind 67-1 Let me start by reminding you that the individuals attempting to push this through were convicted by a Canadian court of environmental crimes, and despite their appeals on legal technicalities, this is a good indication of how they will probably do business here. Promise what we want to hear, then do whatever they please, and when it comes time to reconcile… they will skip town, like they did in Canada in 2015. We do not want to hear "I told you so" in 10 years from the Canadians. As far as I'm concerned, this alone should be reason to reject their proposal.

But wait, there are plenty more reasons to say "no".

Granted, Grass Valley has a long and colorful history as a mining town, and if this were the 19th century or even if the mine were a bit farther out of town, I might personally support a reputable, well-managed mining operation resuming gold production. BUT…

Ind 67-2 In addition to this not being a reputable organization, due to the CEO's previous track record, downtown Grass Valley and Nevada City now rely on 21st century industries like tourism and technology to support

1

the local economy. These industries are NOT served by this mine proposal, and in fact may be substantially harmed by this project.

And there is little indication that this project will bring substantial economic benefit to the area. In the 1850's, gold mining was an entrepreneurial industry, and many people created and built businesses around the mining industry and some created lasting wealth for themselves and their families. Here, the only opportunity created for locals are in relatively low-wage labor and trucking positions, and the bulk of the money generated will immediately leave the area. This is NOT a win for the local labor force.

Saving best for last: for God's sake, think about the water!

The water situation in California is critical, due to climate change and increased population. Again, not the 1850's here.

Ind 67-3 An underground mine will impact underground water, and you genuinely do not know how bad it will be until you do it. No Environmental Impact Report can predict this accurately, and once it happens it cannot be undone. Just ask the people of Banks Island, Canada.

Not only will it impact water below the water table, but the operation will need a LOT of water above ground for it's operations, and presumably will get that water from our NID water system? Sorry folks, but that is not as ample as it has been in years past.

Ind 67-4 Other resources that will be stretched thin include our electric power grid, our roads which will take a heavy beating from heavy trucks, our air, which will absorb substantial pollution and noise, and our spirits, which will be pressed into hard service reconciling our wish for a clean, beautiful city with the realities of a large-scale industrial mining operation so near our downtown.

As our elected representatives, you need to hear and represent our concerns, not those of carpet-bagging industrialists who will not even be here to sue when the eventual problems arise. Note also that since Rise Gold is an "exploration company", they are neither appropriately capitalized to execute the submitted plan, nor intending to follow it through over the 80 years involved. THEY WILL SELL US OUT BEFORE THEY EVEN START, taking the money and leaving us with the mess.

Ind 67-5 80 years is a long time. Do the right thing, and reject the Rise Gold proposal.

Faithfully Yours,

Brandon Butrick
Nevada City, CA
brandon@photoncreative.com

INDIVIDUAL LETTER 67: BRANDON BUTRICK

Response to Comment Ind 67-1
Please see Master Responses 1 and 3.

Response to Comment Ind 67-2
Please see Master Response 2.

Response to Comment Ind 67-3
Please see Master Response 16.

Response to Comment Ind 67-4
Impacts related to electricity, and air pollution are discussed in Chapter 4.3, Air Quality Greenhouse Gas Emissions, and Energy, impacts related to traffic are discussed in Chapter 4.12, Transportation, and impacts related to noise are discussed in Chapter 4.10, Noise, of the DEIR.

Response to Comment Ind 67-5
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Individual Letter 68

From the desk of:
Brandon Butrick
13186 Nob Hill
Nevada City, CA 95959



To:
Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us

Dear and Board of Supervisors and County Planners,

I understand you're still considering the Rise Gold proposal to reopen the Idaho-Maryland Mine. Are you kidding?

No. No. No. No. No.

Let me start by reminding you that the individuals attempting to push this through were convicted by a Canadian court of environmental crimes, and despite their appeals on legal technicalities, this is a good indication of how they will probably do business here. Promise what we want to hear, then do whatever they please, and when it comes time to reconcile... they will skip town, like they did in Canada in 2015. We do not want to hear "I told you so" in 10 years from the Canadians. As far as I'm concerned, this alone should be reason to reject their proposal.

Ind 68-1

But wait, there are plenty more reasons to say "no".

Granted, Grass Valley has a long and colorful history as a mining town, and if this were the 19th century or even if the mine were a bit farther out of town, I might personally support a reputable, well-managed mining operation resuming gold production. BUT...

In addition to this not being a reputable organization, due to the CEO's previous track record, downtown Grass Valley and Nevada City now rely on 21st century industries like tourism and technology to support the local economy. These industries are NOT served by this mine proposal, and in fact may be substantially harmed by this project.

Ind 68-2

And there is little indication that this project will bring substantial economic benefit to the area. In the 1850's, gold mining was an entrepreneurial industry, and many people created and built businesses around the mining industry and some created lasting wealth for themselves and their families. Here, the only opportunity created for locals are in relatively low-wage labor and trucking positions, and the bulk of the

money generated will immediately leave the area. This is NOT a win for the local labor force.

Saving best for last: for God's sake, think about the water!

The water situation in California is critical, due to climate change and increased population. Again, not the 1850's here.

Ind 68-3 An underground mine will impact underground water, and you genuinely do not know how bad it will be until you do it. No Environmental Impact Report can predict this accurately, and once it happens it cannot be undone. Just ask the people of Banks Island, Canada.

Not only will it impact water below the water table, but the operation will need a LOT of water above ground for it's operations, and presumably will get that water from our NID water system? Sorry folks, but that is not as ample as it has been in years past.

Ind 68-4 Other resources that will be stretched thin include our electric power grid, our roads which will take a heavy beating from heavy trucks, our air, which will absorb substantial pollution and noise, and our spirits, which will be pressed into hard service reconciling our wish for a clean, beautiful city with the realities of a large-scale industrial mining operation so near our downtown.

Ind 68-5 As our elected representatives, you need to hear and represent our concerns, not those of carpet-bagging industrialists who will not even be here to sue when the eventual problems arise. Note also that since Rise Gold is an "exploration company", they are neither appropriately capitalized to execute the submitted plan, nor intending to follow it through over the 80 years involved. THEY WILL SELL US OUT BEFORE THEY EVEN START, taking the money and leaving us with the mess.

80 years is a long time. Do the right thing, and reject the Rise Gold proposal.

Faithfully Yours,

Brandon Butrick
Nevada City, CA
brandon@photoncreative.com

INDIVIDUAL LETTER 68: BRANDON BUTRICK

Response to Comment Ind 68-1
Please see Master Responses 1 and 3.

Response to Comment Ind 68-2
Please see Master Response 2.

Response to Comment Ind 68-3
Please see Master Response 16.

Response to Comment Ind 68-4
Impacts related to electricity, and air pollution are discussed in Chapter 4.3, Air Quality Greenhouse Gas Emissions, and Energy, impacts related to traffic are discussed in Chapter 4.12, Transportation, and impacts related to noise are discussed in Chapter 4.10, Noise, of the DEIR.

Response to Comment Ind 68-5
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Individual Letter 69

From: Brandon Hall <chrishansenesquire@gmail.com>
Sent: Monday, April 4, 2022 4:44 PM
To: Idaho MMEIR
Subject: NO MINE!

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Ind 69-1

The Idaho Maryland mine is not in our interest as a community to have. It will poison our ground, our watershed, damage ecosystems, pollute and disturb the peace. The CEO of this company (Benjamin Mossman) is a hack. Even if this is to be green-lit, he will likely not even succeed in his goal. He's failed numerous times in the past, driving past projects into the ground spectacularly and has exemplified the selfishness and vanity of those who wish to exploit resources at the expense of all who share it freely. The average person of Nevada city, and Nevada county does not desire this and no person in their right mind should. Please, hear me and the many others who are pleading. This is an unnecessary dig.

INDIVIDUAL LETTER 69: BRANDON HALL

Response to Comment Ind 69-1

Please see Master Responses 1 and 3.

Individual Letter 70

From: Brian Swagerty <swagerty@gmail.com>
Sent: Sunday, April 3, 2022 3:55 PM
To: Idaho MMEIR
Cc: Heidi Hall
Subject: Idaho-Maryland Mine Reopening DEIR

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Brian Swagerty
14296 Tahoe View Drive
Grass Valley, CA 95945
(619) 990-5618

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
(530) 265-1423

Dear Mr. Kelly:

My name is Brian Swagerty, and I live in the Peardale area of Grass Valley. I have lived here for over four years, after raising our family in Shasta, California, an old mining community just west of Redding. For over twelve years, I worked for the Shasta County Office of Education and was the director of Whiskeytown Environmental School in the Whiskeytown Recreation Area, just west of Redding. We taught sixth and fifth grade students about the environment and how they fit into our ecosystem. The Whiskeytown area is full of old gold mines and areas where they processed the ore. We had plenty of examples of the damage gold mining does to the environment.

Ind 70-1 My wife and I moved to Grass Valley to live in the peaceful foothills of the Sierras. We love the balance of recreation, a slow-paced lifestyle, and opportunities for small businesses to survive. If the Idaho-Maryland Mine were to reopen under the conditions presented in the draft EIR, the character, lifestyle, and quality of life would be negatively affected. I don't agree that we should degrade our quality of life in order to enrich some Canadian investors.

My specific concerns gleaned from reading the draft EIR are in the areas of:

- Multiple water issues
- Increased truck traffic
- Air quality
- Lack of housing for new hires
- Misrepresentation in DEIR of economic benefits
- A general degradation in our quality of life for what?

Water Issues

Ind 70-2 When I worked for the Shasta County Office of Education, I was in charge of building a camp facility in the Manton, California area. We built a camp facility on property that was donated by Leslie and Marice Latieze. They were one of a very few properties that did not sell their water rights to PG&E. There was a time when PG&E bought most of the water rights in the area for their hydroelectric projects. Within a ten year period, the area was drained of its water and was transformed from a green oasis to a brown dry scrubland. I fear that the same fate could befall the Grass Valley area. The DEIR states that water will be pumped from the mine at a rate of 3.6 million gallons a day for six months and then 1.2 million gallons of water a day for 80 years. That massive amount of water being drained from the area on an on-going basis will have a negative impact to the environment.

Ind 70-3 Besides the massive loss of water from the mine area, Wolf Creek is expected to accept all of this water. The DEIR does not adequately address this issue. What will the increased flows do to the hydrology of the creek? How will the water temperature of the mine water affect the down flow streams? How will the increased flows affect the existing wildlife?

Ind 70-4 Increased Truck Traffic

A major concern of mine is the impact the increased truck traffic will cause. The DEIR states that there will be 50 round trip (100 trips), seven days a week, 16 hours a day of trucks hauling rock from the mine to the engineered mountain they will build. My wife and I travel Brunswick Road on a regular basis to access the Brunswick Basin from our home near Peardale. There is already too much traffic coming and going from You Bet Road onto Highway 174. Facing the constant truck brigade along Brunswick Road sounds awful. Just another negative effect of the mine. Besides the increased traffic and congestion and air pollution, what is the increased traffic do the quality of our roads? Is the county ready to increase their road maintenance budget? Are we as a community, willing to pay more taxes to pay to keep our roads in repair? Are we prepared to face increased road repairs and delays? Just another degradation to our quality of life.

Air Quality

Ind 70-5

The death rate for chronic lung disease in Nevada County is twice the state average. The American Lung Association gave Nevada County an "F" for air quality. We cannot afford to add to the already poor air in our area. I thought I had moved into an area of clean air, surrounded by forests and wildlife. After experiencing several wildfire events and breathed the smoke they cause, I downloaded an app that shows the air quality on a daily basis. I noticed that Grass Valley often had worse air than Sacramento. I looked further into this and found that there is a natural wind tunnel that acts as an exhaust for Sacramento and the Valley's poor air that travels through our area on its way through the Sierras. I feel we cannot add to this poor air quality with the increased diesel fumes from the rock trucks and the dust from the mining and rock processing operations. If the mine operators truly wanted to keep the mine impacts to a minimum, they should use electric vehicles to move the rock. It would at least reduce their negative impact a little.

Housing Impacts by New Hires

Ind 70-6

Something that isn't adequately addressed in the DEIR is the impact the opening of the mine will have on local housing. We currently have a severe housing shortage in Nevada County. It is getting harder and harder to make a living in our area when we have to pay such high costs for housing, if you can find it. The dream of home ownership for a young couple in our area is a nightmare, and the rental market isn't much better. What could easily happen to our community is that the jobs are filled with people who fly in to work for a two week period, and then fly out. The workers aren't tied to the community, they are just here while they are working. That happened recently when PG&E contracted with a Texas company to inspect and repair their electric lines. The trucks were parked at the Brunswick area of the Idaho-Maryland Mine, and the workers were housed in temporary trailers while they were here. This is a common practice in remote areas of Australia and other parts of the world. They are called FIFO workers. Fly In Fly Out. I don't want our area to morph into such a community. Let's not add to our lack of housing in our area.

False Economic Benefits

Ind 70-7

Rise Gold asserts that they will create many jobs averaging $90,000 a year. This is extremely misleading. How many people live in our area that have mining expertise? Most of the high-paying jobs will require engineering degrees with mining experience. In other words, the high-paying jobs will be filled by people who do not currently live here. Most of the jobs for locals would be truck drivers, equipment operators, and general workers in the mines. In other words, there may be some low-paying jobs available for our local work force. The sight uptick in area spending won't offset the lower land values the opening of the mine will create. It won't offset the loss of spending by people who would normally come to our area for recreation. No one in our area is going to get rich on gold because of Rise Gold Corporation, even if they invest in their stocks.

Quality of Life

Ind 70-8

Even if the skewed assertions made in the DEIR were true, our quality of life would still be degraded. Just because the levels of pollution are under the legal limits doesn't mean that it won't damage our quality of life. The mine will degrade our water quality and quantity. It will increase our traffic on our roads. It will make our air quality even worse than it already is. It will impact our lack of housing. And for what? Why do we think this is a good idea? Even if Rise Gold Corporation can turn a profit, it will go to Canadian stockholders, not our community. What few tax receipts this project could generate won't pay for the negative impacts it would also generate and we would be left holding the bag.

For the reasons I state above, I feel this project should be rejected. The draft EIR was poorly researched or documented. It made poor assumptions and built conclusions on them. There are much better uses for that land which was not addressed as well. Let's not degrade our community to benefit a corporation with a poor track record of keeping their promises.

Ind 70-9

Thank you for considering my thoughts on this matter.

Sincerely yours,

Brian Swagerty
Nevada County Resident, District 1

2

INDIVIDUAL LETTER 70: BRIAN SWAGERTY

Response to Comment Ind 70-1

This comment is introductory in nature and lists a number of concerns associated with the project such as hydrology, traffic, and housing. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

Response to Comment Ind 70-2

The commenter states that that project's dewatering of the mine will have a negative impact to the environment but does not state how the DEIR is inadequate. The impact to groundwater from mine dewatering is analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR.

Response to Comment Ind 70-3

The commenter states that the DEIR does not adequately address water discharge to South Fork Wolf Creek due to increased flows, water temperature, and the impact of flows to wildlife but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge.

Response to Comment Ind 70-4

The commenter is concerned about truck traffic on Brunswick Road due to congestion, air pollution, and road maintenance cost but does not state how the DEIR is inadequate. Traffic impacts are analyzed in Chapter 4.12 (Transportation) of the DEIR and air quality impacts are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Response to Comment Ind 70-5

The commenter is concerned about the project's impacts to air quality but does not state how the DEIR is inadequate. Diesel fumes from hauling are evaluated in the Health Risk Assessment that was prepared for the proposed project. While the effect of haul truck diesel emissions, in combination with all other project TAC sources, could result in a significant adverse health impact, Mitigation Measure 4.3-2 of the DEIR would reduce this potential impact to a less than significant level.

It is also noted that Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

The commenter is referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 70-6

The commenter is concerned about the project's impact to local housing from project employees moving to the community but does not state how the DEIR is inadequate. Housing is analyzed in Chapter 4.9 (Land Use and Population and Housing) of the DEIR. As stated on page 4.9-27 of the DEIR, the project would provide employment opportunities that would result in indirect population growth. However, population growth resulting from the proposed project would not exceed the current housing stock in the area. Therefore, the project would not induce substantial unplanned population growth, and this impact would be less-than-significant.

Response to Comment Ind 70-7

The commenter states that the project's economic benefits are misleading. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master response 2 - Social and Economic Impacts.

Response to Comment Ind 70-8

The commenter states that even if the DEIR is correct in its estimation of the project's impacts, quality of life will still suffer. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 70-9

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 71

From: Brion Dunbar
To: bdofsupervisors
Subject: Proposed Mine
Date: Tuesday, March 22, 2022 5:33:30 AM

Dist 1

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Hello County Supervisors,
I live in Nevada City CA, district 1. Have lived here since 1989.

I am adamantly opposed to allowing the mine to re-open for the following reasons.

Ind 71-1

1) Rise Gold CEO Ben Mossman has a horrible track record. His company, Banks Island Gold Ltd., owned the Yellow Giant Mine in British Columbia, Canada. They had multiple polluting spills at the site. They ignored shutdown orders. In January 2016, Banks Island declared bankruptcy and walked away — leaving Canadians with only a $420,000 reclamation bond to pay for a cleanup estimated to cost $1.6 million. There were a total of 35 charges issued and in July 2016, Mossman and another Banks Island executive had 18 pollution charges filed against them personally. They were initially acquitted of the charges, though Mossman was fined $15,000, but the B.C. Supreme Court subsequently overturned that acquittal. Despite attempts by their lawyers to block a new trial, a Court of Appeals judge recently issued a decision to reject those appeals. The two are set to face a new trial soon.

Is this the kind of company you want to open such a risky venture here in our beautiful county?!

Ind 71-2

2) Where the mine is located used to be 'in the country'. Now it is a residential area for hundreds of homes, who depend on wells for their domestic water supply. A mine puts their water at risk, no question about it. Would you want a mine next to your house and well? The mine tunnels go for miles in all directions. Stirring up contaminated mine waste undergound is playing Russian Roulette with our water.

Ind 71-3

3). Mine Waste. The mine proposes to dump 3.6 million gallons of treated wastewater every day into South Fork Wolf Creek for 6 months, then 1.2 million gallons a day after that. Who can think this is an okay thing? Will there be monitoring of the quality of the water every day? This company has proven they will skirt environmental requirements. Please think of the DOWNSTREAM PEOPLE and animals.

Thank you for your consideration.
Brion Dunbar
11577 Bourbon Hill Rd
Nevada City CA
(530) 559-1422

INDIVIDUAL LETTER 71: BRION DUNBAR

Response to Comment Ind 71-1
Please see Master Responses 1 and 3.

Response to Comment Ind 71-2
Please see Master Response 14.

Response to Comment Ind 71-3
Please see Master Responses 8 and 35.

Individual Letter 72

Ind 72-1

Criminal Canadian polluters, who went bankrupt running the Yellow Giant mine,
and left a $1,600,000 mess for the government to clean up,
now want to come here.

Meanwhile, waves of California workers, freed from commuting by the internet,
are spreading out from the Bay Area looking for good places to live.

This is a good place to live if the mine doesn't wreck it for the next 80 years.

80 years.
Enough time for all of our children and grandchildren to curse the
economic short-sightedness of letting this mine into our neighborhood.

Tell them to go back to Canada and clean up the mess they made there.

Bruce Klimesh & Deborah Cole
13935 Glenn Pines
Grass Valley

INDIVIDUAL LETTER 72: BRUCE KILMESH AND DEBORAH COLE

Response to Comment Ind 72-1

Please see Master Responses 1 and 3.

Individual Letter 73

From: Cameron Brown <thecameronbrown@gmail.com>
Sent: Monday, April 4, 2022 8:49 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Please Just Say No Mine

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Ind 73-1

Good Morning,
I write as another voice who believes re-opening this mine is an awful idea. We purchased our retirement home here a decade ago and while of course we expect changes, we never would've planned to retire here if it was still an active mining town. The environmental degradation, pollution and noise will be reason enough to change our plans, but beyond that, this Rise group seems a terrible choice for the endeavor. Their previous failure foretells what we can expect when the price of gold drops below their projections. Frankly, this seems more like a classic stock "pump and dump" scheme. The "investors" will do fine in an eventual bankruptcy but our county will be left holding the bag. I'd be surprised if the workers even get severance when it all falls apart. Please don't approve this project, it may be our past but should not be our future. Thank-you!

Cameron Brown
14161 Marigold Way
Nevada City, CA
530-265-2663

INDIVIDUAL LETTER 73: CAMERON BROWN

Response to Comment Ind 73-1

Please see Master Responses 1 and 3.

Individual Letter 74

From: Carlyle Miller <carlyleholmes@hotmail.com>
Sent: Sunday, March 27, 2022 1:23 PM
To: Idaho MMEIR
Subject: Comments on the Draft EIR for the Idaho Maryland Mine

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Dear Mr. Kelley,

Ind 74-1 I am writing to express my concern about the proposed plan to reopen the Idaho-Maryland Mine. I have concerns about the environmental impacts on the fine on our local water quality and air quality as well as its effects on wells in the area.

Ind 74-2 Specifically, I believe that the mitigation suggested in 4.8-2(a) does not require enough time for baseline monitoring before the mine re-opens. With the unpredictable climate of recent years, and recent drought years in particular, one year of monitoring does not give an accurate picture of well and groundwater levels. The levels should be measured for a minimum of 3 years to determine an average pattern.

Thank you for listening.
Carlyle Miller
609 Redbud Way
Nevada City, CA 95959

1

INDIVIDUAL LETTER 74: CARLYLE MILLER

Response to Comment Ind 74-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Response to Comment Ind 74-2

Please see Master Responses 14 through 16. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 75

From: C1 Brady
To: Idaho MMEIR
Subject: attn: Matt Kelley, Senior Planner re: plan to re-open Idaho-Maryland Mine
Date: Tuesday, February 1, 2022 1:42:43 PM

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Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley,

As residents of Nevada County for more than 30 years, we are writing to add our voices to those who have already contacted you to express opposition to the plan to re-open the Idaho-Maryland Mine.

The Nevada County of today looks nothing like the community that existed during the mine's operating years. When the Idaho-Maryland Mine closed in the 1950s, Nevada County's population was somewhere around 20,000. The 2020 census records us at 98,114, and many of today's Nevada County households rely on residential wells for our water.

Ind 75-1

We know you've already heard from many of us regarding concerns over the impact mining operations could have on our residential wells. We know you understand these wells recharge through patterns in fractured rock, and the massive amounts of rock and soil dislodged during mining operations may disrupt those patterns. We're sure you're aware that mining operations de-watered local wells on the North San Juan Ridge in the 1990s.

We're guessing you've received input from residents worried about the potential for the increased contamination of our air and water. Our county still struggles with water quality concerns resulting from the area's mining legacy (NID continues to be burdened with removing mercury from our local water supply). Wildfire smoke already pollutes our air; surely we do not need additional air quality degradation precipitated by a mining operation's dust, exhaust and (possibly) airborne elemental mercury.

Ind 75-2

Rise Grass Valley promises investment in our economy and workforce, but our community pays heavily for those promised benefits. Health issues created by increased air pollution and water contamination are expensive. Loss of residential wells and subsequent property devaluation are expensive. Forfeiture of Nevada County's reputation as a healthy place to raise families is expensive. Re-opening the Idaho-Maryland Mine costs Nevada County too much. We hope the Planning Department will look beyond Rise GV's promises and protect the home we all love.

Ind 75-3

Sincerely,

Carol & Bill Brady



20191 Wolf Creek Road
Grass Valley, CA 95949
(530) 205-5256 and (530)305-0586

INDIVIDUAL LETTER 75: CAROL AND BILL BRADY

Response to Comment Ind 75-1
Please see Master Responses 1, 2, 13, and 14.

Response to Comment Ind 75-2
Impacts related to water quality are addressed in Chapter 4.8, Hydrology and Water Quality, of the DEIR. See also Master Response 13. In addition, impacts related to air quality are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and impacts related to wildfires are addressed in Chapter 4.13, Wildfire, as well as Master Response 6.

Response to Comment Ind 75-3
Please see Master Responses 2, 3, and 14.

Individual Letter 76

From: carol fenner <fenfrond@gmail.com>
Sent: Monday, April 4, 2022 2:59 PM
To: Idaho MMEIR
Subject: RE: Introduction and Comment Letter

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To: Matt Kelley & The Planning Commission:

Introduction:

Ind 76-1

All of these time and energy expenditures for a gold mining project when no one really has any scientific geological info/estimates as to how much gold can even be obtained from it seems comical at best.

Comment re: DEIR:

Ind 76-2

1. Underground there would be "mining within an approximately 2,585-acre mineral rights boundary owned by the applicant…" How much private and air port property will be subject to "sinks" over time? I am from Franklin, NJ which was the site of the richest zinc mine in the world early in the 20th century. I am familiar with land above mined ground caving in, thereby displacing residents and ugly chain link fencing replacing parts of neighborhoods, plus parts of the town itself. The EIR did not take into account this specter.

Ind 76-3

2. The best plan emerging from the DEIR is Alternative 1: No Project (No Build) Alternative.

Best regards,

Carol F. Fenner

Sent from Mail for Windows

1

INDIVIDUAL LETTER 76: CAROL FENNER

Response to Comment Ind 76-1

The comment is an introductory remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 76-2

The potential for collapse associated with underground mine shafts is discussed in Impact 4.6-3 in Chapter 4.6 Geology, Soils, and Mineral Resources, of the DEIR.

Response to Comment Ind 76-3

The commenter states that the best plan emerging from the DEIR is the No Project alternative. As noted within Chapter 6, Alternatives Analysis, of the DEIR, the No Project alternative is considered the environmentally superior alternative; however, the No Project alternative does not meet the basic project objectives.

Individual Letter 77

From: Carol Gicker
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Saturday, February 19, 2022 10:13:07 AM

Dist 4

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Hello,

I just want to let you know that I DO NOT support the re-opening of the Idaho-Maryland Mine. Mining companies in this county have a history of promises, promises, promises and then make the money and run. Our county is still dealing w/ after effects of mining from 100 years plus ago, including arsenic and cyanide water issues.

Ind 77-1 The mailer sent by Rise Grass Valley is full of promises - fire engine, no traffic effects, no health effects, potable water line. What kinds of guarantees are there that any of this would be enough to mitigate the common sense known issues caused by mining?

Please do what you can to stop this mine.

Thank you.

Carol Gicker

Nevada City

INDIVIDUAL LETTER 77: CAROL GICKER

Response to Comment Ind 77-1

Please see Master Responses 1 and 3.

Individual Letter 78

From: Carol Hansen-Dix
To: Idaho MMEIR
Subject: Comment Regarding Mining Project
Date: Tuesday, March 15, 2022 2:19:29 PM

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Ind 78-1

Dear Mr. Kelley,
Any large project, especially as large as this mining operation, is bound to have negative issues that come up and were not foreseen. Often to fix problems a lot of money is thrown at the problem and everybody works night and day to correct the problem. That said the potential for catastrophic things to happen with this project is imminent. It's very possible that the results are untenable. It's also very possible that the problems cannot be reversed and we all will have to live with a bad situation forever. We're talking about mistakes that could render a great number of people without clean water, with noise pollution and even without power. Often the issues do not become clear until it's too late. It's also impossible to foresee everything that could happen good or bad.
I don't mind saying that I would hate to be in your shoes. When things go wrong you're going to be the person everybody points the finger at. If you sign your name on the line then you have the responsibility for the outcome that goes along with it. Realistically, if you decide that this project should not go through very little is going to happen to you that's negative but if you decide that this project should go through, the potential for headaches and sleepless nights for you would be great.
I hope that you stand with the people and not with the corporation. It is a fact that you must live with the citizens of Nevada County from now on. If you don't support this corporation they will go away and you probably will never hear from them again and you will still have your job and you will still be able to sleep at night.
I truly wish you well. Thank you for reading this.

Sincerely,
Carol Hansen-Dix
115 Union Jack St. Grass Valley, Ca 95945
hansendix@yahoo.com
530-320-9649

Sent from Yahoo Mail on Android

INDIVIDUAL LETTER 78: CAROL HANSEN-DIX

Response to Comment Ind 78-1

Please see Master Response 1.

Individual Letter 79

Carol Hyndman
P O Box 1136
Cedar Ridge, CA 95924
530-477-0693
carolhyndman@grandpad.me

April 2, 2023

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Idaho.MMEIR@co.nevada.ca.us



Re: DEIR Comment: Inadequate Mitigation of Air Pollution

My name is Carol Hyndman and I have been a resident of Nevada County for over 25 years. I am a retired educator and my focus was with those having special education needs. I have a longstanding pulmonary health condition which makes this topic especially important to me.

It is clear that there will be many airborne pollutants that will be released during mining processes which will seriously worsen my health and impact the health of many in our community. All the pollutants noted in the DEIR have the potential to cause respiratory problems, acute and chronic, from both short and long-term exposures.

Rise Gold's Brunswick site is just a half mile southeast of the city limit – so any pollutants that are released will funnel into the Brunswick Basin and the City of Grass Valley and beyond.

Ind 79-1

Based on expert analysis of Rise Gold's technical reports in the DEIR, unacceptable pollutants will be released if the Idaho-Maryland Mine reopens. This comment argues that air pollution is not adequately mitigated as claimed by the DEIR. The potential health impacts primarily relates to these four pollutants: diesel emissions, radon, silica, and asbestos. These pollutants must not be allowed to enter our air!

I am especially concerned because Nevada County already has such poor air quality much of the time. The EPA has classified Nevada County to "serious" nonattainment for 8- hour ozone levels. California Air Resources Board, CARB has designated Nevada County as a nonattainment area for the state O3 and PM10 standards. The American Lung Association has given Nevada County an F, a failing grade for air quality due to its high ozone and particle pollution levels.

Also recognize that the World Health Organization revised their air quality guidelines for the first time in 15 years in recognition of the harmful effects of air pollution on human health. They lowered limits for PM2.5, PM10, ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide.

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Nevada County also has a vulnerable population. According to the 2020 census, in NC, nearly a third, 28.6% of our population is 65 years or older, compared to the statewide rate of 14.3%. So, we have an older demographic. The 2019 Health Assessment for NC revealed that our mortality rate for Chronic Lung Disease is twice that of the statewide rate (69 deaths/100,000 people for the county vs 35 deaths/100,000 for the state). Our Heart Disease Mortality rate is 1.5 times higher than the statewide rate. The bottom line is that we have a vulnerable population with chronic conditions that will increase mortality by exposure to these pollutants.

For the DEIR to be certified, it must include an uncompressing set of mitigations to this pollution in the environment and the human body OR an alternative use for the Rise Gold property should be mandated.

Signed,

Carol Hyndman

Carol Hyndman

2

INDIVIDUAL LETTER 79: CAROL HYNDMAN

Response to Comment Ind 79-1

Please refer to chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution. As evaluated under Impact 4.3-2, and shown in Table 4.3-21, emissions of toxic air contaminants (TACs) would not result in health risks to nearby receptors in excess of NSAQMD thresholds. Nonetheless, Mitigation Measure 4.3-2 was included to ensure an Asbestos Dust Mitigation Plan is prepared, as required by the California Air Resources Board (CARB). Further information regarding the assumptions used when conducting the Health Risk Assessment for the proposed project is included in Master Responses 20 through 22.

Individual Letter 80

From: Carol Kuczora
To: BOS Public Comment
Subject: Rise Gold mine
Date: Monday, February 21, 2022 8:32:40 PM

Dist 3

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Ind 80-1

The science is clear: The mine is a killer.

We cannot afford to dump fossil fuel exhaust in the air if civilization is to survive. Really. Air pollution is rising relentlessly, and it is driving global warming progressively. You know that is because the carbon compounds in the atmosphere reflect much more solar heat back to the ground than normal, upsetting the delicate balance that had enabled life to thrive on earth. We've understood that for decades. If it continues, every generation will suffer much more than the one before.

So what are we doing about this? Considering reopening the Idaho-Maryland gold mine. That means diesel trucks hauling 1000 tons of waste rock, 100 trips every day, plus trucking in explosives. Add a large factory on Brunswick Road, and massive machines crushing 1500 tons of mine waste every day. That's just counting diesel exhaust, which contains hundreds of toxic chemicals plus carbon particulates small enough to enter your blood. Then the silicate rock dust includes asbestos. We will have a lot of sick people, and they will endure unprecedented killer temperatures.

This is just one reason the mine is a horrendous idea. Please vote to protect us.

Sincerely,
Carol Kuczora, 11198 Butler Road, Grass Valley

INDIVIDUAL LETTER 80: CAROL KUCZORA

Response to Comment Ind 80-1

Please see Master Response 1. In addition, Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR provides a detailed analysis of potential air quality and greenhouse gas impacts associated with the proposed project. Specifically, Impact 4.3-2 addresses whether the project would expose sensitive receptors to substantial air pollutant concentrations. As noted therein, a Health Risk Assessment (HRA) was prepared to address air pollutant concerns related to diesel particulate matter generated by diesel trucks operating as part of the proposed project, as well as health risks associated with silica rock and asbestos (see Master Responses 21 and 22 for a description of the assumptions used to assess the aforementioned materials). Therefore, impacts related to air pollutant concerns were adequately addressed in the DEIR. Please see also Master Response 27.

Individual Letter 81

From: Carol Suzzara
To: Idaho-MNEIR
Subject: DEIR Comment
Date: Monday, February 21, 2022 7:45:12 PM

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Ind 81-1

The science is clear: We cannot afford to dump fossil fuel exhaust in the air if civilization is to survive. Really. Air pollution is rising relentlessly, and it is driving global warming progressively. That is because the carbon compounds in the atmosphere reflect much more solar heat back to the ground than normal, upsetting the delicate balance that had enabled life to thrive on earth. We've understood that for decades. If it continues, every generation will suffer more than the one before.

So what are we doing about this? Considering reopening the Idaho-Maryland gold mine. That means diesel trucks hauling 1000 tons of waste rock, 100 trips every day, plus trucking in explosives. Add a large factory on Brunswick Road, and massive machines crushing 1500 tons of mine waste every day. That's just counting diesel exhaust, which contains hundreds of toxic chemicals plus carbon particulates small enough to enter your blood. Then the silicate rock dust includes asbestos. We will have a lot of sick people, and they will endure unprecedented killer temperatures.

This is just one reason the mine is a horrendous idea. Please vote to protect us.

Reply Forward

INDIVIDUAL LETTER 81: CAROL KUCZORA

Response to Comment Ind 81-1

Please see Master Response 1. In addition, Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR provides a detailed analysis of potential air quality and greenhouse gas impacts associated with the proposed project. Specifically, Impact 4.3-2 addresses whether the project would expose sensitive receptors to substantial air pollutant concentrations. As noted therein, a Health Risk Assessment (HRA) was prepared to address air pollutant concerns related to diesel particulate matter generated by diesel trucks operating as part of the proposed project, as well as health risks associated with silica rock and asbestos (see Master Responses 21 and 22 for a description of the assumptions used to assess the aforementioned materials). Therefore, impacts related to air pollutant concerns were adequately addressed in the DEIR. Please see also Master Response 27.

Individual Letter 82

From: mcmillancar@cs.com
Sent: Friday, March 18, 2022 3:34 PM
To: Idaho MMEIR
Cc: Heidi Hall
Subject: Comment regarding Draft Environmental Impact Statement - Idaho-Maryland Mine

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Ind 82-1

The above report details many impacts and potential mitigations. I would specifically like to raise concerns about the claims regarding air quality. As noted at the beginning of the section regarding this issue, Nevada County currently faces specific challenges in this regard.

"Winds are, in general, stronger in spring and summer and lower in fall and winter. Periods of calm winds and clear skies in fall and winter often result in strong, ground-based inversions forming in mountain valleys. These layers of very stable air restrict the dispersal of pollutants, trapping these pollutants near the ground, representing the worst conditions for local air pollution occurring in the County." (Chapter 4-3.11)

Nonetheless, the report maintains that only in the year of initial construction will the air quality be impacted significantly by greenhouse gas emissions totaling more than 340 metric tons. In succeeding years, despite the estimated emissions doubling to 7221 metric tons, the impact is considered not significant. It would seem that all the relevant figures in this section need to be reexamined.

Ind 82-2

Further, the mitigation strategy proposed is to purchase carbon offsets. Offsets used to mathematically match carbon stored with the greenhouse gases emitted, do not help ameliorate the pollution in the location impacted by the emissions. In fact, they are often seen as a false solution, since the trees planted, or wind turbines built don't really happen or if they do, their location is far from the site of the pollution.

Perhaps the proponents of the mine reopening are assuming that since Nevada County already experiences poor air quality, there is no reason to be concerned about adding to the mix. Nothing could be further from the truth.

Carol McMillan
516 Eskaton Circle
Grass Valley, CA 95945

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INDIVIDUAL LETTER 82: CAROL MCMILLAN

Response to Comment Ind 82-1

The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 82-2

The commenter states that the project's Mitigation Measure 4.3-7(b) (purchase of carbon offsets) is not an adequate solution to air pollution. The commenter is referred to Master Response 28 - Greenhouse Gas Credits and Master Response 18 -Air Quality Thresholds.

Individual Letter 83

From: Carol Nelson
To: bdofsupervisors
Subject: No to Rise Gold
Date: Saturday, March 12, 2022 8:55:56 AM

Dist 4

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Ind 83-1

To the Nevada County Board of Supervisors,
Please do not allow Rise Gold Corp to reopen the Idaho Maryland mine. I live in Penn Valley (Lake Wildwood) and I often drive to and from Grass Valley and Nevada City on Highways 20 and 49. There are already too many heavy, large trucks on these highways. Additional heavy truck traffic from Rise Gold operations will increase traffic and dangerous driving conditions on roads surrounding their operation.

Ind 83-2

In addition to my concerns about increasing dangerous traffic conditions, I am concerned about the negative environmental impacts including dust generation and use of scarce resources such as water and electricity.

Of all the people that I know in Nevada County, I know of no one who thinks reopening this mine is positive for Nevada County as a place to live.

Ind 83-3

Thank-you for your attention,
Carol R Nelson
18526 Lake Forest Dr
Penn Valley, CA 95946
650 868-9908

INDIVIDUAL LETTER 83: CAROL NELSON

Response to Comment Ind 83-1

Please see Master Response 1.

Regarding concerns about increased heavy truck traffic resulting from the proposed project, please refer to Chapter 4.12, Transportation, of the DEIR. The DEIR addressed impacts regarding whether the project would substantially increase hazards to vehicle safety under Impact 4.12-6, and concluded that with Mitigation Measures 4.12-6(a) through 4.12-6(f), a less-than-significant impact would occur. Therefore, impacts related to heavy truck traffic and hazardous roadway conditions were adequately addressed in the DEIR.

Response to Comment Ind 83-2

Potential impacts related to dust generation and electricity usage are discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR. Potential impacts related to water usage are discussed in Chapter 4.11, Public Services and Utilities, of the DEIR.

Response to Comment Ind 83-3

The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 84

From: Carol Purchase <cpurchase52@gmail.com>
Sent: Monday, April 4, 2022 1:05 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine Project DEIR Comments

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Dear Mr. Kelley,
I am submitting the following comments on the DEIR:

Ind 84-1 I fully support the comments submitted by CEA Foundation (https://www.minewatchnc.org/post/deir-comments-mar2022)

Additionally:

Ind 84-2 The DEIR and technical reports should use industry standard definitions and replace such terms as 'barren' with waste rock and 'sand tailings' with 'tailings' . A section with definitions should be included for these terms as well as definitions for project specific terms such as 'engineered fill', etc.

Ind 84-3 The clean up of the Centennial site should be incorporated into the timeline of the project, and where would the waste rock and tailings be placed prior to the Centennial site being available for these materials?

Ind 84-4 The tailings produced would likely be very fine grained material, vulnerable to transport as suspended sediment. It is likely this fine material would carry heavy metals, such as the iron and arsenic detected in the geologic analysis. As such, the stormwater detention and tailings ponds should be placed and designed such that they would not overflow or fail in the event of a 100 year + precipitation event. Failure of these ponds would have significant consequences locally and down Wolf Creek. As the 'engineered fill' on the Centennial site would be deposited over many years, the exposed areas of the fill should have adequate erosion control throughout the rainy season. The reclamation plan states the erosion control would be adequate for a 20 year rain event, which should be increased to be able to withstand a 100 year event.

Ind 84-5 The tailings ponds, stormwater detention ponds, drainage structures and vegetation on site will need maintenance after the mining has ended. How will the County ensure that these sites do not end up being County liabilities in the future. The 90 foot tall mound perched above Wolf Creek will likely become covered with highly flammable vegetation (manzanita) as have other sites with poor soil productivity in our area. Without management this area will become vulnerable to high severity wildfire. A wildfire on that site would result in erosion and likely slope failures into Wolf Creek. Ponds and drainage structures without regular maintenance will eventually fail.

Ind 84-6 The CEA Foundation analyzed the groundwater technical reports and found the analysis and sampling inadequate. Given that this project has the potential to permanently deplete groundwater resources, a more thorough and independently peer reviewed groundwater analysis is needed before the BOS can make an informed decision.

Ind 84-7 As our climate changes, our region is experiencing increasing drought years as well as the potential for high precipitation events from back to back atmospheric rivers. With these climate patterns, this project has a significant potential to risk our most critical resource - a clean and reliable water supply. I urge the BOS to ensure they have all the needed information prior to making this decision that could have very long consequences into the future.

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Respectfully,
Carol Purchase
Grass Valley

INDIVIDUAL LETTER 84: CAROL PURCHASE

Response to Comment Ind 84-1

This comment in introductory in nature and does not discuss the adequacy of the DEIR. The commenter is referred to the responses to comments submitted by CEA in Group Letters 7 and 8.

Response to Comment Ind 84-2

The commenter states that the DEIR should use different terminology for "barren rock" and "sand tailings." Barren rock (with no gold values and not processed) is differentiated from mineralized rock (with gold values which is processed) in the DEIR to facilitate an understanding of the proposed project. Barren rock is also proposed to be sold in some cases and therefore would be a mineral product and not waste rock. The tailings particles are primarily of sand size gradation (DEIR, Appx. H.1, p. 14.) and therefore sand tailings is an appropriate description in the DEIR. Barren rock and sand tailings are compacted in lifts to engineering standards in order to provide a useful surface appropriate for construction of future buildings on the sites and is therefore described as engineered fill.

Response to Comment Ind 84-3

The commenter states that the cleanup of the Centennial Industrial Site should be incorporated into the DEIR. As stated on page 3-26 of the DEIR, if the remediation of the Centennial Industrial Site, currently under DTSC oversight, is not complete upon commencement of mining, engineered fill would be placed at the Brunswick Industrial Site and/or transported off-site to be utilized in local and regional construction markets. Likewise, if the remediation of the Centennial Industrial Site is not complete within the life of the mining permit, engineered fill would be placed at the Brunswick Industrial Site and/or transported off-site to be utilized in local and regional construction markets, and no material from the mine would be placed on the Centennial Industrial Site. The commenter is also referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 84-4

The commenter states that the stormwater detention basins and the tailings pond should be sized for a 100-year storm event. No tailings pond is proposed for the project. The drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm event. (DEIR, 4.8-40.) Impact 4.8-3 and Table 4.8-4 provides a discussion regarding the detention basins at the Brunswick and Centennial Industrial Sites and both basins are designed to contain stormwater runoff in a 100-year, 24-hour storm event. (DEIR, 4.8-69–75.)

Response to Comment Ind 84-5

The commenter states that the tailings ponds, stormwater detention pond, and drainage structures will require maintenance at the end of the project. The project does not propose to use a tailings pond.

As discussed on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The Project Applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial

institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the mining operation's approved Plan.

There is no evidence that the drainage facilities would fail due to lack of maintenance or the site would become overgrown, and wildfires would cause slope failures and erosion. This impact is speculative, and the County is not required to analyze speculative impacts under CEQA. (CEQA Guidelines Section 15384.)

Response to Comment Ind 84-6

The commenter sates that the groundwater impact analysis in the DEIR is inadequate but provides no specific reasons why it is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 84-7

The commenter states that the project will have adverse effect to groundwater supplies because of drought and climate change. The commenter is referred to Master Response 16 – Drought and Climate Change.

Individual Letter 85

RECEIVED
APR 04 2022
County of Nevada
County Executive Office

April 3, 2022

RE: Rise Gold Corp. Securities & Exchange Commission Form S-1 Submitted 3/29/2022 to SEC
Purpose to Provide Major Shareholders Ability to Sell Shares
http://archive.fast-edgar.com/20220330/A82SQQ2CZ225OZZZ2G2C2ZO5AKNKZZ2ZZ242/#page_1
or: https://www.sec.gov/Archives/edgar/data/1424864/000127351119000094/f191028riseforms1.htm

To: Nevada County Planning Commission

I have discovered through our brokerage firm that the above document has been filed within the past week, and I am submitting a copy for your perusal. Also, the above website is the location where it can be found along with ability to see other reports, such as 10-K, etc.

It is important for our Nevada County leaders to be aware of the potential investment risk that future shareholders are being advised through the document that is prepared by Rise Gold Corp., itself.

You are aware of the past history of Rise Gold in Canada, but there is also another legal trial in Canada that is upcoming as soon as April 11, 2022 involving Mr. Ben Mossman as spelled out in this document.

Ind 85-1

Hopefully, you all can protect our community from an ultra- risky attempt to re-open the Idaho-Maryland mine. I don't think it is worth the numerous potential environmental impacts as well as the potential negative financial impact our wonderful residents in Nevada County could suffer.

Sincerely,

Carol Todd

Carol Todd
PO Box 1191
Cedar Ridge, CA 95924

Ind 85-2

P.S. My husband was born and raised in Grass Valley. His father worked In the Idaho-Maryland Mine. My husband remembers the dust and noise from this mine in Union Hill area where they lived. The noise from the Idaho-Maryland plus the Empire Mine could be heard 24-7.

Attachment: Securities and Exchange Commission – Form S-1

Ind 85-3

As filed with the Commission on March 29, 2022

File No. 333-_____

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM S-1

REGISTRATION STATEMENT UNDER THE SECURITIES ACT OF 1933

RISE GOLD CORP.

(Exact Name of Registrant as Specified in its Charter)

Nevada	**1000**	**30-0692325**
(State or other jurisdiction of incorporation)	*(Primary Standard Industrial Classification Code Number)*	*(IRS Employer Identification No.)*

Suite 650 - 669 Howe Street
Vancouver, BC V6C 0B4
Canada

(604) 260-4577

(Address, including zip code, and telephone number, including area code, of registrant's principal executive offices)

Nevada Business Center, LLC
701 South Carson Street, Suite 200
Carson City, Nevada 89701

(Name, address, including zip code, and telephone number, including area code, of agent for service)

Copies to:

Dale A. Rondeau, Esq.
Thomas, Rondeau LLP
Suite 1120 - 625 Howe Street
Vancouver, British Columbia V6C 2T6
Canada

J. Brad Wiggins, Esq.
Securities Law USA, PLLC
10 G Street, NE, Suite 600
Washington, DC 20002

Approximate date of commencement of proposed sale to the public: As soon as practicable after this registration statement becomes effective.

If any of the securities being registered on this Form are to be offered on a delayed or continuous basis pursuant to Rule 415 under the Securities Act of 1933 check the following box: ☒

If this Form is filed to register additional securities for an offering pursuant to Rule 462(b) under the Securities Act, please check the following box and list the Securities Act registration statement number of the earlier registration statement for the same offering. ☐

If this Form is a post-effective amendment filed pursuant to Rule 462(c) under the Securities Act, check the following box and list the Securities Act registration statement number of the earlier effective registration statement for the same offering. ☐

If this Form is a post-effective amendment filed pursuant to Rule 462(d) under the Securities Act, check the following box and list the Securities Act registration statement number of the earlier effective registration statement for the same offering. ☐

Indicate by check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, a smaller reporting company or an emerging growth company:

Large Accelerated Filer ☐ Accelerated Filer ☐ Non-Accelerated Filer ☒ Smaller Reporting Company ☒

Emerging Growth Company ☒

If an emerging growth company, indicate by check mark if the registrant has elected not to use the extended transition period for complying with any new or revised financial accounting standards pursuant to Section (7)(a)(2)(B) of the Securities Act. ☐

The registrant hereby amends this registration statement on such date or dates as may be necessary to delay its effective date until the registrant shall file a further amendment which specifically states that this registration statement shall thereafter become effective in accordance with Section 8(a) of the Securities Act of 1933 or until the registration statement shall become effective on such date as the Commission, acting pursuant to Section 8(a), may determine.

The information contained in this prospectus is not complete and may be changed. The selling stockholders may not sell these securities until the registration statement filed with the Securities and Exchange Commission is effective. This prospectus is not an offer to sell these securities and the selling stockholders are not soliciting an offer to buy these securities in any state where the offer or sale is not permitted.

Subject To Completion, Dated March 29, 2022



12,840,000 Shares of Common Stock

This prospectus relates to the resale or other disposition from time to time by certain selling stockholders, as further described in this prospectus, of up to an aggregate of 12,840,000 shares of the Common Stock (the "**Shares**") of Rise Gold Corp. (the "**Company**", "**Rise**", "**we**", "**us**" or "**our**"). The Shares registered for sale are as follows:

- 6,017,500 Shares held by selling stockholders;
- 6,017,500 Shares issuable upon exercise of common stock purchase warrants held by selling stockholders issued January 28, 2022 and exercisable at a price per Share of $0.60; and
- 805,000 Shares issuable upon exercise of incentive stock options held by selling stockholders granted February 7, 2022 and exercisable at a price per Share of $0.65.

The Shares, warrants and options held by the selling stockholders were issued to such selling stockholders pursuant to private transactions between our company and the selling stockholders. The selling stockholders may sell or otherwise dispose of the Shares covered by this prospectus or interests therein on any stock exchange, market or trading facility on which the shares are traded or in private transactions. These dispositions may be at fixed prices, at prevailing market prices at the time of sale, at prices related to the prevailing market price, at varying prices determined at the time of sale, or at negotiated prices. Additional information about the selling stockholders, and the times and manner in which they may offer and sell Shares under this prospectus, is provided in the sections entitled "Selling Stockholders" and "Plan of Distribution" of this prospectus.

We will not receive any proceeds from the resale of the Shares by the selling stockholders.

Our Common Stock is listed on the Canadian Securities Exchange (the "**CSE**") under the symbol "RISE" and quoted on the OTCQX under the symbol "RYES".

All dollar amounts reflected herein refer to U.S. dollars unless otherwise noted.

We are an "emerging growth company" as defined under federal securities laws and, as such, may elect to comply with certain reduced public company requirements for future filings.

Investing in the Shares involves a high degree of risk. See "Risk Factors" beginning on page 6 of this prospectus.

Neither the Securities and Exchange Commission (the "SEC") nor any state securities commission has approved or disapproved of the securities offered hereby or passed upon the adequacy or accuracy of this prospectus. Any representation to the contrary is a criminal offense.

The date of this prospectus is _____, 2022

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GLOSSARY OF TERMS

"**Common Stock**" means the issued and unissued shares of our common stock with a par value of $0.001;

"**CSE**" means the Canadian Securities Exchange;

"**Exchange Act**" means the Securities Exchange Act of 1934, as amended;

"**February 2022 Stock Options**" means incentive stock options granted on February 7, 2022 and exercisable at a price per Share of $0.65 until February 7, 2027;

"**I-M Mine Property**" means the Idaho-Maryland Mine Property comprising approximately 93 acres (38 hectares) surface land and approximately 2,800 acres (1,133 hectares) mineral rights located near Grass Valley of Nevada County in northern California, USA.

"**I-M Mine Project**" means Rise's gold project located on the I-M Mine Property;

"**January 2022 Warrants**" means common stock purchase warrants issued on January 28, 2022, exercisable at a price of $0.60 per share until January 28, 2024; and

"**Securities Act**" means the United States Securities Act of 1933, as amended.

CURRENCY

All dollar amounts in this prospectus are expressed in U.S. dollars unless otherwise indicated. Some of our material agreements use Canadian dollars and our Common Stock is traded on the CSE in Canadian dollars. As used herein "C$" represents Canadian dollars.

The following table sets forth the Bank of Canada rate of exchange for the Canadian dollar, expressed in United States dollars in effect at the end of the periods indicated, the average of exchange rates in effect during such periods, and the high and low exchange rates during such periods for conversion of Canadian dollars into United States dollars:

	Fiscal Year Ended July 31		
Canadian Dollars to U.S. Dollars	**2021($)**	**2020($)**	**2019($)**
Rate at end of period	0.8024	0.7460	0.7606
Average rate for period	0.7857	0.7433	0.7558
High for period	0.8306	0.7710	0.7811
Low for period	0.7465	0.6898	0.7330

ABOUT THIS PROSPECTUS

This prospectus is part of a registration statement that we filed with the SEC. You should rely only on the information contained in this prospectus. We have not authorized anyone to provide you with information different from that contained in this prospectus. This prospectus is offering to sell, and is seeking offers to buy, the securities only in jurisdictions where offers and sales are permitted. The information contained in this prospectus speaks only as of the date of this prospectus (unless the information specifically indicates that another date applies), regardless of the time of delivery of this prospectus or of any sale of the Shares.

We may provide a prospectus supplement containing specific information about the terms of a particular offering by the selling stockholders, or their transferees. The prospectus supplement may add, update or change information in this prospectus. If information in a prospectus supplement is inconsistent with the information in this prospectus, you should rely on the information in that prospectus supplement. You should read both this prospectus and, if applicable, any prospectus supplement hereto. See "Where You Can Find More Information" for more information.

This prospectus includes and incorporates by reference industry and market data and other information that we have obtained from, or which is based upon, market research, independent industry publications or other publicly available information. Any such data and other information is subject to change based on various factors, including those described below under the heading "Risk Factors" and elsewhere in this prospectus.

We have not, and the selling stockholders have not, authorized anyone to provide you with information different from that contained or incorporated by reference in this prospectus or in any supplement to this prospectus or free writing prospectus, and neither we nor the selling stockholders take any responsibility for any other information that others may give you. This prospectus is not an offer to sell, nor is it a solicitation of an offer to buy, the securities in any jurisdiction where the offer or sale is not permitted. You should not assume that the information contained in this prospectus or any prospectus supplement or free writing prospectus is accurate as of any date other than the date on the front cover of those documents, or that the information contained in any document incorporated by reference is accurate as of any date other than the date of the document incorporated by reference, regardless of the time of delivery of this prospectus or any sale of a security. Our business, financial condition, results of operations and prospects may have changed since those dates.

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PROSPECTUS SUMMARY

This summary highlights certain information contained elsewhere in this prospectus. You should read this entire prospectus carefully, including the "Risk Factors" and the financial statements and related notes incorporated by reference herein. This prospectus includes forward-looking statements that involve risks and uncertainties. See "Cautionary Note Regarding Forward-Looking Statements." References to "we," "our," "Rise," and the "Company" refer to Rise Gold Corp.

About the Company

We are a mineral exploration stage company incorporated in the state of Nevada, United States. Our current business operations are focused on exploring the I-M Mine Property located near Grass Valley of Nevada County in northern California. Our head office is located in Vancouver, BC, Canada, while certain members of the management team are now located in the United States.

We acquired our interest in the I-M Mine Project by exercising an option granted pursuant to an option agreement dated August 30, 2016 (as amended November 11, 2016 and December 23, 2016) with the owners of the property. A more detailed discussion of the I-M Mine Project and of the current status of our business operations is provided under the sections entitled "Business" and "Properties" in our Form 10-K annual report for the year ended July 31, 2021, which is incorporated herein by reference.

Our head office is located at Suite 650 - 669 Howe Street, Vancouver, BC V6C 0B4, Canada, and our telephone number is (604) 260-4577.

The Offering

Shares Offered by the Selling Stockholders	12,840,000 Shares of our Common Stock, including: • 6,017,500 Shares held by selling stockholders; • 6,017,500 Shares issuable upon exercise of common stock purchase warrants held by selling stockholders issued on January 28, 2022 and exercisable at a price per Share of $0.60; • 805,000 Shares issuable upon exercise of incentive stock options held by selling stockholders granted February 7, 2022 and exercisable at a price per Share of $0.65.
Offering Price	Determined at the time of sale by the selling stockholders.
Use of Proceeds	We will not receive any proceeds from the sale of the Shares by selling stockholders covered by this prospectus.
Common Stock Outstanding as of March 28, 2022	32,787,798 shares of Common Stock.
Trading Symbols	Our Common Stock is listed on the CSE under the symbol "RISE" and quoted on the OTCQX under the symbol "RYES".
Risk Factors	Investing in our securities involves a high degree of risk. See "Risk Factors".

RISK FACTORS

Investing in the Shares involves a high degree of risk. You should consider carefully the risks and uncertainties described below, together with all of the other information contained and incorporated by reference in this prospectus, before deciding to invest in the Shares. If any of the following risks materialize, our business, financial condition, results of operations, and future prospects will likely be materially and adversely affected. In that event, the market price of the Shares could decline and you could lose all or part of your investment.

Risks Related to Our Company

Our business, financial condition and results of operations may be negatively affected by economic and other consequences from Russia's military action against Ukraine and the sanctions imposed in response to that action.

In late February 2022, Russia launched a large scale military attack on Ukraine. The invasion significantly amplified already existing geopolitical tensions among Russia, Ukraine, Europe, NATO and the West, including the United States, In response to the military action by Russia, various countries, including the United States, the United Kingdom and European Union issued broad-ranging economic sanctions against Russia. Such sanctions included, among other things, a prohibition on doing business with certain Russian companies, large financial institutions, officials and oligarchs; a commitment by certain countries and the European Union to remove selected Russian banks from the Society for Worldwide Interbank Financial Telecommunications, or SWIFT, the electronic banking network that connects banks globally; a ban of oil imports from Russia to the United States; and restrictive measures to prevent the Russian Central Bank from undermining the impact of the sanctions. Additional sanctions may be imposed in the future. Such sanctions (and any future sanctions) and other actions against Russia may adversely impact, among other things, the Russian economy and various sectors of the economy, including but not limited to, financials, energy, metals and mining, engineering and defense and defense-related materials sectors; result in a decline in the value and liquidity of Russian securities; result in boycotts, tariffs, and purchasing and financing restrictions on Russia's government, companies and certain individuals; weaken the value of the ruble; downgrade the country's credit rating; freeze Russian securities and/or funds invested in prohibited assets and impair the ability to trade in Russian securities and/or other assets; and have other adverse consequences on the Russian government, economy, companies and region. Further, several large corporations and U.S. states have announced plans to divest interests or otherwise curtail business dealings with certain Russian businesses.

The ramifications of the hostilities and sanctions may not be limited to Russia, Ukraine and Russian and Ukrainian companies and may spill over to and negatively impact other regional and global economic markets (including Europe and the United States), companies in other countries (particularly those that have done business with Russia and Ukraine) and on various sectors, industries and markets for securities and commodities globally, such as oil and natural gas. Accordingly, the actions discussed above and the potential for a wider conflict could increase financial market volatility and cause severe negative effects on regional and global economic markets, industries, and companies. In addition, Russia may take retaliatory actions and other countermeasures, including cyberattacks and espionage against other countries and companies around the world, which may negatively impact such countries and companies.

The extent and duration of the military action or future escalation of such hostilities, the extent and impact of existing and future sanctions, market disruptions and volatility, and the result of any diplomatic negotiations cannot be predicted.

While we expect any direct impacts to our business to be limited, the indirect impacts on the economy and on the mining industry and other industries in general could negatively affect our business and may make it more difficult for us to raise equity or debt financing.

In addition, the impact of other current macro-economic factors on our business, which may be exacerbated by the war in Ukraine - including inflation, supply chain constraints and geopolitical events - is uncertain.

The novel coronavirus (COVID-19) pandemic may negatively affect our business, financial condition and results of operations.

The COVID-19 pandemic (including the emergence of variant strains of COVID-19), and measures taken in response by governments and health authorities around the world, has created ongoing uncertainty that has resulted in, and may continue to result in, restrictions on movement and on businesses being maintained, re-imposed or imposed on a stricter basis, which could negatively impact our business, results of operations and financial condition. These restrictions have adversely affected workforces, customers, supply chains, consumer sentiment, economies, and financial markets, and, along with decreased consumer spending, have led to an economic downturn across many global economies.

The extent to which COVID-19 ultimately impacts our business, financial condition and results of operations will depend on future developments, which are uncertain. It is impossible at this point to predict precisely the duration or extent of the impacts of the COVID-19 pandemic on our employees, customers, partners and business or when economic activity will normalize. There continues to be uncertainty surrounding the duration and severity of the COVID-19 pandemic, particularly with respect to the emergence of new variants of the virus, including the Omicron variant, the long-term efficacy and availability of COVID-19 vaccines and rates of vaccination (including COVID-19 vaccine booster shots) and the impact of vaccine mandates as well as risks relating to the pandemic worsening in countries that are already afflicted with COVID-19 or the COVID-19 pandemic continuing to spread to additional countries or returning to countries where the pandemic has been partially contained. These conditions may affect our ability to obtain debt and equity financing to fund ongoing exploration activities, as well as conduct business more efficiently.

Since the pandemic began, we have taken action to minimize the risks of the COVID-19 virus for our employees, contractors and other people participating in our operations, programs and activities. We continue to monitor the developments of the outbreak and continually assess the potential impact on our business. The health and safety of our work force remains a priority and we continue to follow government health protocols both in Canada and the United States.

The COVID-19 pandemic has resulted in, and may continue to result in, significant market uncertainty, including substantial fluctuations in commodity prices, currency exchange rates, inflation, interest rates, and general levels of investing and consumption. Even after the COVID-19 pandemic becomes endemic, we may experience materially adverse impacts to our business as a result of the pandemic's global economic impact.

Our ability to operate as a going concern

The ability of the Company to continue as a going concern is dependent on the Company's ability to maintain continued support from its shareholders and creditors and to raise additional capital and implement its business plan.
There is no assurance that the Company will be able to obtain adequate financing in the future or that such financing will be on terms advantageous to the Company. However, management believes that the Company has sufficient working capital to meet its projected minimum financial obligations for the next fiscal year. The accompanying financial statements have been prepared under the assumption that we will continue as a going concern. We are an exploration stage company and we have incurred losses since our inception.

We will require significant additional capital to fund our business plan.

We will be required to expend significant funds to determine whether proven and probable mineral reserves exist at our properties, to continue exploration and, if warranted, to develop our existing properties, and to identify and acquire additional properties to diversify our property portfolio. We anticipate that we will be required to make substantial capital expenditures for the continued exploration and, if warranted, development of our I-M Mine Property. We have spent and will be required to continue to expend significant amounts of capital for drilling, geological, and geochemical analysis, assaying, permitting, and feasibility studies with regard to the results of our exploration at our I-M Mine Property. We may not benefit from some of these investments if we are unable to identify commercially exploitable mineral reserves.

Our ability to obtain necessary funding for these purposes, in turn, depends upon a number of factors, including the status of the national and worldwide economy and the price of metals. Capital markets worldwide were adversely affected by substantial losses by financial institutions, caused by investments in asset-backed securities and remnants from those losses continue to impact the ability for us to raise capital. We may not be successful in obtaining the required financing or, if we can obtain such financing, such financing may not be on terms that are favorable to us.

Our inability to access sufficient capital for our operations could have a material adverse effect on our financial condition, results of operations, or prospects. Sales of substantial amounts of securities may have a highly dilutive effect on our ownership or share structure. Sales of a large number of shares of our Common Stock in the public markets, or the potential for such sales, could decrease the trading price of those shares and could impair our ability to raise capital through future sales of Common Stock. We have not yet commenced commercial production at any of our properties and, therefore, have not generated positive cash flows to date and have no reasonable prospects of doing so unless successful commercial production can be achieved at our I-M Mine Property. We expect to continue to incur negative investing and operating cash flows until such time as we enter into successful commercial production. This will require us to deploy our working capital to fund such negative cash flow and to seek additional sources of financing. There is no assurance that any such financing sources will be available or sufficient to meet our requirements. There is no assurance that we will be able to continue to raise equity capital or to secure additional debt financing, or that we will not continue to incur losses.

We have a limited operating history on which to base an evaluation of our business and prospects.

Since our inception, we have had no revenue from operations. We have no history of producing products from any of our properties. Our I-M Mine Project is a historic, past-producing mine with apart from the exploration work that we have completed since 2016 has had very little recent exploration work since 1956. Advancing our I-M Mine Property into the development stage will require significant capital and time, and successful commercial production from the I-M Mine Property will be subject to completing feasibility studies, permitting and re-commissioning of the mine, constructing processing plants, and other related works and infrastructure. As a result, we are subject to all of the risks associated with developing and establishing new mining operations and business enterprises including:

- completion of feasibility studies to verify reserves and commercial viability, including the ability to find sufficient ore reserves to support a commercial mining operation;
- the timing and cost, which can be considerable, of further exploration, preparing feasibility studies, permitting and construction of infrastructure, mining and processing facilities;
- the availability and costs of drill equipment, exploration personnel, skilled labor, and mining and processing equipment, if required;
- the availability and cost of appropriate smelting and/or refining arrangements, if required;
- compliance with stringent environmental and other governmental approval and permit requirements;
- the availability of funds to finance exploration, development, and construction activities, as warranted;
- potential opposition from non-governmental organizations, local groups or local inhabitants that may delay or prevent development activities;
- potential increases in exploration, construction, and operating costs due to changes in the cost of fuel, power, materials, and supplies; and
- potential shortages of mineral processing, construction, and other facilities related supplies.

The costs, timing, and complexities of exploration, development, and construction activities may be increased by the location of our properties and demand by other mineral exploration and mining companies. It is common in exploration programs to experience unexpected problems and delays during drill programs and, if commenced, development, construction, and mine start-up. In addition, our management and workforce will need to be expanded, and sufficient support systems for our workforce will have to be established. This could result in delays in the commencement of mineral production and increased costs of production. Accordingly, our activities may not result in profitable mining operations and we may not succeed in establishing mining operations or profitably producing metals at any of our current or future properties, including our I-M Mine Property.

We have a history of losses and expect to continue to incur losses in the future.

We have incurred losses since inception, have had negative cash flow from operating activities, and expect to continue to incur losses in the future. We have incurred the following losses from operations during each of the following periods:

- $1,603,878 for the year ended July 31, 2021; and
- $5,471,535 for the year ended July 31, 2020

We expect to continue to incur losses unless and until such time as one of our properties enters into commercial production and generates sufficient revenues to fund continuing operations. We recognize that if we are unable to generate significant revenues from mining operations and/or dispositions of our properties, we will not be able to earn profits or continue operations. At this early stage of our operation, we also expect to face the risks, uncertainties, expenses, and difficulties frequently encountered by companies at the start-up stage of their business development. We cannot be sure that we will be successful in addressing these risks and uncertainties and our failure to do so could have a materially adverse effect on our financial condition.

Risks Related to Mining and Exploration

The I-M Mine Property is in the exploration stage. There is no assurance that we can establish the existence of any mineral reserve on the I-M Mine Property or any other properties we may acquire in commercially exploitable quantities. Unless and until we do so, we cannot earn any revenues from these properties and if we do not do so we will lose all of the funds that we expend on exploration. If we do not discover any mineral reserve in a commercially exploitable quantity, the exploration component of our business could fail.

We have not established that any of our mineral properties contain any mineral reserve according to recognized reserve guidelines, nor can there be any assurance that we will be able to do so.

A mineral reserve is defined in subpart 1300 of Regulation S-K under the Securities Act ("**Subpart 1300**") as an estimate of tonnage and grade or quality of "indicated mineral resources" and "measured mineral resources" (as those terms are defined in Subpart 1300) that, in the opinion of a "qualified person" (as defined in Subpart 1300), can be the basis of an economically viable project. In general, the probability of any individual prospect having a "reserve" that meets the requirements of Subpart 1300 is small, and our mineral properties may not contain any "reserves" and any funds that we spend on exploration could be lost. Even if we do eventually discover a mineral reserve on one or more of our properties, there can be no assurance that they can be developed into producing mines and that we can extract those minerals. Both mineral exploration and development involve a high degree of risk, and few mineral properties that are explored are ultimately developed into producing mines.

The commercial viability of an established mineral deposit will depend on a number of factors including, by way of example, the size, grade, and other attributes of the mineral deposit, the proximity of the mineral deposit to infrastructure such as processing facilities, roads, rail, power, and a point for shipping, government regulation, and market prices. Most of these factors will be beyond our control, and any of them could increase costs and make extraction of any identified mineral deposit unprofitable.

The nature of mineral exploration and production activities involves a high degree of risk and the possibility of uninsured losses.

Exploration for and the production of minerals is highly speculative and involves greater risk than many other businesses. Most exploration programs do not result in the discovery of mineralization, and any mineralization discovered may not be of sufficient quantity or quality to be profitably mined. Our operations are, and any future development or mining operations we may conduct will be, subject to all of the operating hazards and risks normally incidental to exploring for and development of mineral properties, such as, but not limited to:

- economically insufficient mineralized material;
- fluctuation in production costs that make mining uneconomical;
- labor disputes;
- unanticipated variations in grade and other geologic problems;
- environmental hazards;
- water conditions;
- difficult surface or underground conditions;
- industrial accidents;
- metallurgic and other processing problems;
- mechanical and equipment performance problems;
- failure of dams, stockpiles, wastewater transportation systems, or impoundments;
- unusual or unexpected rock formations; and
- personal injury, fire, flooding, cave-ins and landslides.

Any of these risks can materially and adversely affect, among other things, the development of properties, production quantities and rates, costs and expenditures, potential revenues, and production dates. If we determine that capitalized costs associated with any of our mineral interests are not likely to be recovered, we would incur a write-down of our investment in these interests. All of these factors may result in losses in relation to amounts spent that are not recoverable, or that result in additional expenses.

Commodity price volatility could have dramatic effects on the results of operations and our ability to execute our business plan.

The price of commodities varies on a daily basis. Our future revenues, if any, will likely be derived from the extraction and sale of base and precious metals. The price of those commodities has fluctuated widely, particularly in recent years, and is affected by numerous factors beyond our control including economic and political trends, expectations of inflation, currency exchange fluctuations, interest rates, global and regional consumptive patterns, speculative activities and increased production due to new extraction developments and improved extraction and production methods. The effect of these factors on the price of base and precious metals, and therefore the economic viability of our business, could negatively affect our ability to secure financing or our results of operations.

Estimates of mineralized material and resources are subject to evaluation uncertainties that could result in project failure.

Our exploration and future mining operations, if any, are and would be faced with risks associated with being able to accurately predict the quantity and quality of mineralized material and resources/reserves within the earth using statistical sampling techniques. Estimates of any mineralized material or resource/reserve on any of our properties would be made using samples obtained from appropriately placed trenches, test pits, underground workings, and intelligently designed drilling. There is an inherent variability of assays between check and duplicate samples taken adjacent to each other and between sampling points that cannot be reasonably eliminated. Additionally, there also may be unknown geologic details that have not been identified or correctly appreciated at the current level of accumulated knowledge about our properties. This could result in uncertainties that cannot be reasonably eliminated from the process of estimating mineralized material and resources/reserves. If these estimates were to prove to be unreliable, we could implement an exploitation plan that may not lead to commercially viable operations in the future.

Any material changes in mineral resource/reserve estimates and grades of mineralization will affect the economic viability of placing a property into production and a property's return on capital.

As we have not completed feasibility studies on our I-M Mine Property and have not commenced actual production, mineralization resource estimates may require adjustments or downward revisions. In addition, the grade of ore ultimately mined, if any, may differ from that indicated by future feasibility studies and drill results. Minerals recovered in small scale tests may not be duplicated in large scale tests under on-site conditions or in production scale.

Our exploration activities on our properties may not be commercially successful, which could lead us to abandon our plans to develop our properties and our investments in exploration.

Our long-term success depends on our ability to identify mineral deposits on our I-M Mine Property and other properties we may acquire, if any, that we can then develop into commercially viable mining operations. Mineral exploration is highly speculative in nature, involves many risks, and is frequently non-productive. These risks include unusual or unexpected geologic formations, and the inability to obtain suitable or adequate machinery, equipment, or labor. The success of commodity exploration is determined in part by the following factors:

- the identification of potential mineralization based on surficial analysis;
- availability of government-granted exploration permits;
- the quality of our management and our geological and technical expertise; and
- the capital available for exploration and development work.

Substantial expenditures are required to establish proven and probable reserves through drilling and analysis, to develop metallurgical processes to extract metal, and to develop the mining and processing facilities and infrastructure at any site chosen for mining. Whether a mineral deposit will be commercially viable depends on a number of factors that include, without limitation, the particular attributes of the deposit, such as size, grade, and proximity to infrastructure; commodity prices, which can fluctuate widely; and government regulations, including, without limitation, regulations relating to prices, taxes, royalties, land tenure, land use, importing and exporting of minerals, and environmental protection. We may invest significant capital and resources in exploration activities and may abandon such investments if we are unable to identify commercially exploitable mineral reserves. The decision to abandon a project may have an adverse effect on the market value of our securities and the ability to raise future financing.

We are subject to significant governmental regulations that affect our operations and costs of conducting our business and may not be able to obtain all required permits and licenses to place our properties into production.

Our current and future operations, including exploration and, if warranted, development of the I-M Mine Property, do and will require permits from governmental authorities and will be governed by laws and regulations, including:

- laws and regulations governing mineral concession acquisition, prospecting, development, mining, and production;
- laws and regulations related to exports, taxes, and fees;
- labor standards and regulations related to occupational health and mine safety; and
- environmental standards and regulations related to waste disposal, toxic substances, land use reclamation, and environmental protection.

Companies engaged in exploration activities often experience increased costs and delays in production and other schedules as a result of the need to comply with applicable laws, regulations, and permits. Failure to comply with applicable laws, regulations, and permits may result in enforcement actions, including the forfeiture of mineral claims or other mineral tenures, orders issued by regulatory or judicial authorities requiring operations to cease or be curtailed, and may include corrective measures requiring capital expenditures, installation of additional equipment, or costly remedial actions. We cannot predict if all permits that we may require for continued exploration, development, or construction of mining facilities and conduct of mining operations will be obtainable on reasonable terms, if at all. Costs related to applying for and obtaining permits and licenses may be prohibitive and could delay our planned exploration and development activities. We may be required to compensate those suffering loss or damage by reason of our mineral exploration or our mining activities, if any, and may have civil or criminal fines or penalties imposed for violations of, or our failure to comply with, such laws, regulations, and permits.

Existing and possible future laws, regulations, and permits governing operations and activities of exploration companies, or more stringent implementation of such laws, regulations and permits, could have a material adverse impact on our business and cause increases in capital expenditures or require abandonment or delays in exploration. Our I-M Mine Property is located in California and has numerous clearly defined regulations with respect to permitting mines, which could potentially impact the total time to market for the project.

Subsurface mining is allowed in the Nevada County M1 Zoning District, where the I-M Mine Property is located, with approval of a "Use Permit". Approval of a Use Permit for mining operations requires a public hearing before the County Planning Commission, whose decision may be appealed to the County Board of Supervisors ("County Board"). Use Permit approvals include conditions of approval, which are designed to minimize the impact of conditional uses on neighboring properties.

On November 21, 2019 we submitted an application for a Use Permit to Nevada County (the "County"). On April 28, 2020, with a vote of 5-0, the County Board approved the contract for Raney Planning & Management Inc. to prepare an Environmental Impact Report and conduct contract planning services on behalf of the County for the proposed I-M Mine Project.

The Use Permit application proposes underground mining to recommence at the I-M Mine Property at an average throughput of 1,000 tons per day. The existing Brunswick Shaft, which extends to ~3400 feet depth below surface, would be used as the primary rock conveyance from the I-M Mine Property. A second service shaft would be constructed by raising from underground to provide for the conveyance of personnel, materials, and equipment. Processing would be done by gravity and flotation to produce gravity and flotation gold concentrates.

We propose to produce barren rock from underground tunneling and sand tailings as part of the project which would be used for creation of approximately 58 acres of level and useable industrial zoned land for future economic development in Nevada County. A water treatment plant and pond, using conventional processes, would ensure that groundwater pumped from the mine is treated to regulatory standards before being discharged to the local waterways. There is no assurance our Use Permit application will be accepted as submitted. If substantial revisions are required, our ability to execute our business plan will be further delayed.

In 1975, the California Legislature enacted the Surface Mining and Reclamation Act ("**SMARA**"), which required that all surface mining operations in California have approved reclamation plans and financial assurances. SMARA was adopted to ensure that land used for mining operations in California would be reclaimed post-mining to a useable condition. Pursuant to SMARA, we would be required to obtain approval of a Reclamation Plan from and provide financial assurances to the County for any surface component of the underground mining operation before mining operations could commence. Approval of a Reclamation Plan will require a public hearing before the County Planning Commission.

To approve a Reclamation Plan and Use Permit, the County would need to satisfy the requirements of California Environmental Quality Act ("**CEQA**"). CEQA requires that public agency decision makers study the environmental impacts of any discretionary action, disclose the impacts to the public, and minimize unavoidable impacts to the extent feasible. CEQA is triggered whenever a California governmental agency is asked to approve a "discretionary project". The approval of a Reclamation Plan is a "discretionary project" under CEQA. Other necessary ancillary permits like the California Department of Fish and Wildlife ("**CDFW**") Streambed Alteration Agreement (if applicable) also triggers CEQA compliance.

In this situation, the lead agency for the purposes of CEQA would be the County. Other public agencies in charge of administering specific legislation will also need to approve aspects of the Project, such as the CDFW (the California Endangered Species Act), the Air Pollution Control District (Authority to Construct and Permit to Operate), and the Regional Water Quality Control Board (National Pollutant Discharge Elimination System (authorized to state governments by the US Environmental Protection Agency) and Report of Waste Discharge). However, CEQA's Guidelines provide that if more than one agency must act on a project, the agency that acts first is generally considered the lead agency under CEQA. All other agencies are considered "responsible agencies." Responsible agencies do need to consider the environmental document approved by the lead agency, but they will usually accept the lead agency's document and use it as the basis for issuing their own permits. There is no assurance that other agencies will not require additional assessments in their decision making process. If such assessments are required, additional time and costs will delay the execution of, and may even require us to re-evaluate the feasibility of, our business plan.



Our activities are subject to environmental laws and regulations that may increase our costs of doing business and restrict our operations.

All phases of our operations are subject to environmental regulation in the jurisdictions in which we operate. Environmental legislation is evolving in a manner that may require stricter standards and enforcement, increased fines and penalties for non-compliance, more stringent environmental assessments of proposed projects, and a heightened degree of responsibility for companies and their officers, directors, and employees. These laws address emissions into the air, discharges into water, management of waste, management of hazardous substances, protection of natural resources, antiquities and endangered species, and reclamation of lands disturbed by mining operations. Compliance with environmental laws and regulations, and future changes in these laws and regulations, may require significant capital outlays and may cause material changes or delays in our operations and future activities. It is possible that future changes in these laws or regulations could have a significant adverse impact on our properties or some portion of our business, causing us to re-evaluate those activities at that time.

Regulations and pending legislation governing issues involving climate change could result in increased operating costs, which could have a material adverse effect on our business.

A number of governments or governmental bodies have introduced or are contemplating legislative and/or regulatory changes in response to concerns about the potential impact of climate change. Legislation and increased regulation regarding climate change could impose significant costs on us, on our future venture partners, if any, and on our suppliers, including costs related to increased energy requirements, capital equipment, environmental monitoring and reporting, and other costs necessary to comply with such regulations. Any adopted future climate change regulations could also negatively impact our ability to compete with companies situated in areas not subject to such limitations. Given the emotional and political significance and uncertainty surrounding the impact of climate change and how it should be dealt with, we cannot predict how legislation and regulation will ultimately affect our financial condition, operating performance, and ability to compete. Furthermore, even without such regulation, increased awareness and any adverse publicity in the global marketplace about potential impacts on climate change by us or other companies in our industry could harm our reputation. The potential physical impacts of climate change on our operations are highly uncertain, could be particular to the geographic circumstances in areas in which we operate and may include changes in rainfall and storm patterns and intensities, water shortages, changing sea levels, and changing temperatures. These impacts may adversely impact the cost, production, and financial performance of our operations.

Land reclamation requirements for our properties may be burdensome and expensive.

Although variable depending on location and the governing authority, land reclamation requirements are generally imposed on mineral exploration companies (as well as companies with mining operations) in order to minimize long term effects of land disturbance.

Reclamation may include requirements to:

- control dispersion of potentially deleterious effluents;
- treat ground and surface water to drinking water standards; and
- reasonably re-establish pre-disturbance landforms and vegetation.

In order to carry out reclamation obligations imposed on us in connection with our potential development activities, we must allocate financial resources that might otherwise be spent on further exploration and development programs. We plan to set up a provision for our reclamation obligations on our properties, as appropriate, but this provision may not be adequate. If we are required to carry out unanticipated reclamation work, our financial position could be adversely affected.

We face intense competition in the mining industry.

The mining industry is intensely competitive in all of its phases. As a result of this competition, some of which is with large established mining companies with substantial capabilities and with greater financial and technical resources than ours, we may be unable to acquire additional properties, if any, or financing on terms we consider acceptable. We also compete with other mining companies in the recruitment and retention of qualified managerial and technical employees. If we are unable to successfully compete for qualified employees, our exploration and development programs may be slowed down or suspended. We compete with other companies that produce our planned commercial products for capital. If we are unable to raise sufficient capital, our exploration and development programs may be jeopardized or we may not be able to acquire, develop, or operate additional mining projects.

A shortage of equipment and supplies could adversely affect our ability to operate our business.

We are dependent on various supplies and equipment to carry out our mining exploration and, if warranted, development operations. Any shortage of such supplies, equipment, and parts could have a material adverse effect on our ability to carry out our operations and could therefore limit, or increase the cost of, production.

Joint ventures and other partnerships, including offtake arrangements, may expose us to risks.

We may enter into joint ventures, partnership arrangements, or offtake agreements, with other parties in relation to the exploration, development, and production of the properties in which we have an interest. Any failure of such other companies to meet their obligations to us or to third parties, or any disputes with respect to the parties' respective rights and obligations, could have a material adverse effect on us, the development and production at our properties, including the I-M Mine Property, and on future joint ventures, if any, or their properties, and therefore could have a material adverse effect on our results of operations, financial performance, cash flows and the price of our Common Stock.

We may experience difficulty attracting and retaining qualified management to meet the needs of our anticipated growth, and the failure to manage our growth effectively could have a material adverse effect on our business and financial condition.

We are dependent on a relatively small number of key employees, including our Chief Executive Officer and Chief Financial Officer. The loss of any officer could have an adverse effect on us. We have no life insurance on any individual, and we may be unable to hire a suitable replacement for them on favorable terms, should that become necessary.

Our results of operations could be affected by currency fluctuations.

Our properties are currently all located in the United States and while most costs associated with these properties are paid in U.S. dollars, a significant amount of our administrative expenses are payable in Canadian dollars. There can be significant swings in the exchange rate between the U.S. dollar and the Canadian dollar. There are no plans at this time to hedge against any exchange rate fluctuations in currencies.

Title to our properties may be subject to other claims that could affect our property rights and claims.

There are risks that title to our properties may be challenged or impugned. Our I-M Mine Property is located in California and may be subject to prior unrecorded agreements or transfers and title may be affected by undetected defects.

We may be unable to secure surface access or purchase required surface rights.

Although we obtain the rights to some or all of the minerals in the ground subject to the mineral tenures that we acquire, or have the right to acquire, in some cases we may not acquire any rights to, or ownership of, the surface to the areas covered by such mineral tenures. In such cases, applicable mining laws usually provide for rights of access to the surface for the purpose of carrying on mining activities; however, the enforcement of such rights through the courts can be costly and time consuming. It is necessary to negotiate surface access or to purchase the surface rights if long-term access is required. There can be no guarantee that, despite having the right at law to carry on mining activities, we will be able to negotiate satisfactory agreements with any such existing landowners/occupiers for such access or purchase of such surface rights, and therefore we may be unable to carry out planned mining activities. In addition, in circumstances where such access is denied, or no agreement can be reached, we may need to rely on the assistance of local officials or the courts in such jurisdiction the outcomes of which cannot be predicted with any certainty. Our inability to secure surface access or purchase required surface rights could materially and adversely affect our timing, cost, or overall ability to develop any mineral deposits we may locate.

Our properties and operations may be subject to litigation or other claims.

From time to time our properties or operations may be subject to disputes that may result in litigation or other legal claims. We may be required to take countermeasures or defend against these claims, which will divert resources and management time from operations. The costs of these claims or adverse filings may have a material effect on our business and results of operations.

We do not currently insure against all the risks and hazards of mineral exploration, development, and mining operations.

Exploration, development, and mining operations involve various hazards, including environmental hazards, industrial accidents, metallurgical and other processing problems, unusual or unexpected rock formations, structural cave-ins or slides, flooding, fires, and periodic interruptions due to inclement or hazardous weather conditions. These risks could result in damage to or destruction of mineral properties, facilities, or other property, personal injury, environmental damage, delays in operations, increased cost of operations, monetary losses, and possible legal liability. We may not be able to obtain insurance to cover these risks at economically feasible premiums or at all. We may elect not to insure where premium costs are disproportionate to our perception of the relevant risks. The payment of such insurance premiums and of such liabilities would reduce the funds available for exploration and production activities.

Risks Related to the Shares

Our share price may be volatile and as a result you could lose all or part of your investment.

In addition to volatility associated with equity securities in general, the value of your investment could decline due to the impact of any of the following factors upon the market price of the Shares:

- Disappointing results from our exploration efforts;
- Decline in demand for our Common Stock;
- Downward revisions in securities analysts' estimates or changes in general market conditions;
- Technological innovations by competitors or in competing technologies;
- Investor perception of our industry or our prospects; and
- General economic trends.

Our share price on the CSE and the OTCQX has experienced significant price and volume fluctuations. Stock markets in general have experienced extreme price and volume fluctuations, and the market prices of securities have been highly volatile. These fluctuations are often unrelated to operating performance and may adversely affect the market price of the Shares. As a result, you may be unable to sell any Shares you acquire at a desired price.

We have never paid dividends on our Common Stock.

We have not paid dividends on our Common Stock to date, and we do not expect to pay dividends for the foreseeable future. We intend to retain our initial earnings, if any, to finance our operations. Any future dividends on Common Stock will depend upon our earnings, our then-existing financial requirements, and other factors, and will be at the discretion of the Board.

Investors' interests in our company will be diluted and investors may suffer dilution in their net book value per share of Common Stock if we issue additional employee/director/consultant options or if we sell additional Common Stock and/or warrants to finance our operations.

In order to further expand our operations and meet our objectives, any additional growth and/or expanded exploration activity will likely need to be financed through sale of and issuance of additional Common Stock, including, but not limited to, raising funds to explore the I-M Mine Property. Furthermore, to finance any acquisition activity, should that activity be properly approved, and depending on the outcome of our exploration programs, we likely will also need to issue additional Common Stock to finance future acquisitions, growth, and/or additional exploration programs of any or all of our projects or to acquire additional properties. We will also in the future grant to some or all of our directors, officers, and key employees and/or consultants options to purchase Common Stock as non-cash incentives. The issuance of any equity securities could, and the issuance of any additional Common Stock will, cause our existing stockholders to experience dilution of their ownership interests.

If we issue additional Common Stock or decide to enter into joint ventures with other parties in order to raise financing through the sale of equity securities, investors' interests in our company will be diluted and investors may suffer dilution in their net book value per share of Common Stock depending on the price at which such securities are sold.

The issuance of additional shares of Common Stock may negatively impact the trading price of our securities.

We have issued Common Stock in the past and will continue to issue Common Stock to finance our activities in the future. In addition, newly issued or outstanding options, warrants, and broker warrants to purchase Common Stock may be exercised, resulting in the issuance of additional Common Stock. Any such issuance of additional Common Stock would result in dilution to our stockholders, and even the perception that such an issuance may occur could have a negative impact on the trading price of the Common Stock.

We are subject to the continued listing criteria of the CSE, and our failure to satisfy these criteria may result in delisting of our Common Stock from the CSE.

Our Common Stock is currently listed for trading on the CSE. In order to maintain the listing on the CSE or any other securities exchange we may trade on, we must maintain certain financial and share distribution targets, including maintaining a minimum number of public shareholders. In addition to objective standards, these exchanges may delist the securities of any issuer if, in the exchange's opinion, our financial condition and/or operating results appear unsatisfactory; if it appears that the extent of public distribution or the aggregate market value of the security has become so reduced as to make continued listing inadvisable; if we sell or dispose of our principal operating assets or cease to be an operating company; if we fail to comply with the listing requirements; or if any other event occurs or any condition exists which, in their opinion, makes continued listing on the exchange inadvisable.

If the CSE or any other exchange were to delist the Common Stock, investors may face material adverse consequences, including, but not limited to, a lack of trading market for the Common Stock, reduced liquidity, decreased analyst coverage, and/or an inability for us to obtain additional financing to fund our operations.

We are an "emerging growth company," and we cannot be certain if the reduced reporting requirements applicable to emerging growth companies will make our Common Stock less attractive to investors.

We are an "emerging growth company," as defined in the Jumpstart Our Business Startups Act (the "JOBS Act"). For as long as we continue to be an emerging growth company, we may take advantage of exemptions from various reporting requirements that are applicable to other public companies that are not emerging growth companies, including not being required to comply with the auditor attestation requirements of Section 404 of the Sarbanes-Oxley Act, reduced disclosure obligations regarding executive compensation in our periodic reports and proxy statements, and exemptions from the requirements of holding a non-binding advisory vote on executive compensation and stockholder approval of any golden parachute payments not previously approved. We could be an emerging growth company for up to five years, although circumstances could cause us to lose that status earlier, including if the market value of our Common Stock held by non-affiliates exceeds $700 million as of any July 31 before that time, in which case we would no longer be an emerging growth company as of the following January 31. We cannot predict if investors will find our Common Stock less attractive because we may rely on these exemptions. If some investors find our Common Stock less attractive as a result, there may be a less active trading market for our Common Stock and our stock price may be more volatile. Under the JOBS Act, emerging growth companies can also delay adopting new or revised accounting standards until such time as those standards apply to private companies. We have elected to avail ourselves of this exemption from new or revised accounting standards and, therefore, will not be subject to the same new or revised accounting standards as other public companies that are not emerging growth companies.



CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

The information discussed in this prospectus includes "forward-looking statements" within the meaning of Section 27A of the Securities Act and Section 21E of the Exchange Act. All statements, other than statements of historical facts, included in this prospectus concerning, among other things, planned capital expenditures, future cash flows and borrowings, pursuit of potential acquisition opportunities, our financial position, business strategy and other plans and objectives for future operations, future exploration activities, future mineral resource estimates, and future joint venture arrangements are forward-looking statements. These forward-looking statements are identified by the use of terms and phrases such as "may," "expect," "estimate," "project," "plan," "believe," "intend," "achievable," "anticipate," "will," "continue," "potential," "should," "could," "would", "might" and similar terms and phrases.

Forward-looking statements are subject to a variety of known and unknown risks, uncertainties, and other factors that could cause actual events or results to differ from those expressed or implied by the forward-looking statements, including, without limitation, risks related to:

- our requirement of significant additional capital;
- our limited operating history;
- our history of losses;
- our properties that are in the exploration stage;
- mineral exploration and production activities;
- our lack of mineral production from our properties;
- our exploration activities being unsuccessful;
- our ability to obtain permits and licenses for production;
- government and environmental regulations that may increase our costs of doing business or restrict our operations;
- proposed legislation that may significantly affect the mining industry;
- land reclamation requirements;
- competition in the mining industry;
- equipment and supply shortages;
- current and future joint ventures and partnerships;
- our ability to attract qualified management;
- currency fluctuations;
- claims on the title to our properties;
- surface access on our properties;
- potential future litigation;
- our lack of insurance covering all our operations;
- our Common Stock, including price volatility, lack of dividend payments and dilution;
- the impact of the COVID-19 pandemic, including impacts on employees, our operations including our ability to raise equity or debt capital, regulations resulting in potential business interruptions and travel restrictions, and the global economy; and
- the impacts of the Russian war in Ukraine and related sanctions on the global economy and on the mining industry.

This list is not exhaustive of the factors that may affect our forward-looking statements. Some of the important risks and uncertainties that could affect forward-looking statements are described further under "Risk Factors" in this prospectus. Should one or more of these risks or uncertainties materialize, or should underlying assumptions prove incorrect, actual results may vary materially from those anticipated, believed, estimated, or expected. We caution readers not to place undue reliance on any such forward-looking statements, which speak only as of the date made. We disclaim any obligation subsequently to revise any forward-looking statements to reflect events or circumstances after the date of such statements or to reflect the occurrence of anticipated or unanticipated events, except as required by law.

USE OF PROCEEDS

This prospectus relates to the sale or other disposition of Shares of our Common Stock by the selling stockholders listed in the "Selling Stockholders" section below, and their transferees. We will not receive any proceeds from any sale of the Shares by the selling stockholders.

SELLING STOCKHOLDERS

This prospectus covers the offering of up to 12,840,000 Shares by selling stockholders. This includes Shares acquirable upon exercise of our outstanding warrants and our outstanding incentive stock options.

Selling stockholders are persons or entities that, directly or indirectly, have acquired shares, or will acquire shares from us from time to time upon exercise of certain warrants and incentive stock options. This prospectus and any prospectus supplement will only permit the selling stockholders to sell the Shares identified in the column "Number of Shares Offered Hereby."

The selling stockholders may from time to time offer and sell the Shares pursuant to this prospectus and any applicable prospectus supplement. The selling stockholders may offer all or some portion of the Shares they hold or acquire, but only Shares that are currently outstanding or are acquired upon the exercise of certain warrants and incentive stock options that are currently outstanding, and in either case included in the "Number of Shares Offered Hereby" column, may be sold pursuant to this prospectus or any applicable prospectus supplement.

The Shares issued to the selling stockholders are "restricted" securities under applicable federal and state securities laws and are being registered to give the selling stockholders the opportunity to sell their Shares. The registration of such Shares does not necessarily mean, however, that any of these Shares will be offered or sold by the selling stockholders. The selling stockholders may from time to time offer and sell all or a portion of their Shares on the CSE, in the over-the-counter market, in negotiated transactions, or otherwise, at market prices prevailing at the time of sale or at negotiated prices.

The registered Shares may be sold directly or through brokers or dealers, or in a distribution by one or more underwriters on a firm commitment or best efforts basis. To the extent required, the names of any agent or broker-dealer and applicable commissions or discounts and any other required information with respect to any particular offer will be set forth in an accompanying prospectus supplement. See "Plan of Distribution."

Each of the selling stockholders reserves the sole right to accept or reject, in whole or in part, any proposed purchase of the registered Shares to be made directly or through agents. To the extent that any of the selling stockholders are affiliates of our company or are brokers or dealers, they may be deemed to be "underwriters" within the meaning of the Securities Act and any commissions received by them and any profit on the resale of the registered shares may be deemed to be underwriting commissions or discounts under the Securities Act. As of the date of this prospectus, and based on the representations we have received from the selling stockholders, none of the selling stockholders are brokers or dealers or are affiliated with a broker or dealer. Selling stockholders that are affiliates of or have material relationships with our company are identified below.

The following table sets forth the name of persons who are offering the resale of Shares by this prospectus, the number of shares of Common Stock beneficially owned by each person, the number of Shares that may be sold in this offering and the number of shares of Common Stock each person will own after the offering, assuming they sell all of the Shares offered. The information appearing in the table below is based on information provided by or on behalf of the named selling stockholders. We will not receive any proceeds from the resale of the Shares by the selling stockholders.

Name	Number of Shares of Common Stock Beneficially Owned Prior to this Offering[1]	Number of Shares Offered Hereby[1]	Shares of Common Stock Owned After the Offering	
			Number	Percent [1]
9458-2855 Quebec Inc.[2]	3,360,000	3,360,000[3]	-	-
Benjamin Wayne Mossman[4]	1,997,043	400,000[5]	1,597,043	4.67%
David A. Foley	322,116	250,000[6]	72,116	*
Eileen Au	81,921	40,000[7]	41,921	*
EMA GARP FUND, L.P.[8]	3,179,656	1,250,000[9]	1,929,656	5.81%
Emma Grace Espinosa	30,000	25,000[10]	5,000	*
Francis John Facto	265,000	100,000[11]	165,000	*
George W. Noyes TTEE GSL 2015 Trust[12]	969,769	250,000[13]	719,769	2.18%
GR7 Holdings Inc.[14]	100,000	100,000[15]	-	-
Gwen Proust 2018 Alter Ego Trust[16]	1,640,915	1,400,000[17]	240,915	*
H. Jamal Holdings Ltd.[18]	326,000	125,000[19]	201,000	*
Jeff Crane	250,000	250,000[20]	-	-
John Graham Proust[21]	1,162,700	100,000[22]	1,062,700	3.21%
Joseph Betti	141,198	100,000[23]	41,198	*
Julie Lahmani Bejet	250,000	250,000[24]	-	-
Kim R. Overmyer	125,000	125,000[25]	-	-
Lawrence Ward Lepard[26]	1,426,875	400,000[27]	1,026,875	3.10%
Maria D Furman Revocable[28] Trust 2014	405,000	250,000[29]	155,000	*
Murray Guinn Flanigan[30]	140,000	100,000[31]	40,000	*
Myrmikan Gold Fund, LLC[32]	3,243,183	1,250,000[33]	1,993,183	6.03%
Pacific Premier Trust Custodian[34] FBO Robert Cunjak IRA	210,000	125,000[35]	85,000	*
Patrick Robert McKim	182,850	75,000[36]	107,850	*
Perry Wong	184,500	125,000[37]	59,500	*
Rostislav Raykov	280,000	250,000[38]	30,000	*
SEA VIEW Investments LLC[39]	1,000,000	1,000,000[40]	-	-
Thomas Irving Vehrs [41]	185,000	100,000[42]	85,000	*
VBS Exchange Pty Ltd [43]	4,000,000	1,000,000[44]	3,000,000	8.88%
Vincent Wei-Jiun Boon[45]	80,000	40,000[46]	40,000	*
Total	**25,538,726**	**12,840,000**	**12,698,726**	

* less than 1%

(1) This table is based upon information supplied by the selling stockholders, which information may not be accurate as of the date hereof. We have determined beneficial ownership in accordance with the rules of the SEC. In computing the number of shares beneficially owned by a selling stockholder, shares that may be acquired by the stockholder upon exercise of any convertible securities (e.g., warrants and options) that are eligible (or within the next 60 days will become eligible) to be exercised (e.g., options that are vested or will vest any time within the next 60 days) are included with respect to that stockholder. Except as indicated by the footnotes below, we believe, based on the information furnished to us, that the selling stockholders named in the table above have sole voting and investment power with respect to all shares of Common Stock that they beneficially own, subject to applicable community property laws. Applicable percentages are based on 32,787,798 shares of Common Stock outstanding on March 28, 2022, adjusted as required by rules promulgated by the SEC.
(2) Michael Gentile, President and sole owner of 9458-2855 Quebec Inc., controls these securities.
(3) Includes 1,680,000 shares issuable upon exercise of January 2022 Warrants.
(4) Benjamin Wayne Mossman is a director and officer of the company.
(5) Includes 50,000 shares issuable upon exercise of January 2022 Warrants and includes 300,000 shares issuable upon exercise of February 2022 Stock Options.
(6) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(7) Shares issuable upon exercise of February 2022 Stock Options.
(8) Lawrence Ward Lepard, a director of the Company and the Managing General Partner of Equity Management Associates ("**EMA**") along with David A. Foley, the Managing Partner of EMA, controls these securities.
(9) Includes 625,000 shares issuable upon exercise of January 2022 Warrants.
(10) Shares issuable upon exercise of February 2022 Stock Options.
(11) Includes 50,000 shares issuable upon exercise of January 2022 Warrants.
(12) George W. Noyes, the beneficial owner, controls these securities.
(13) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(14) Murray G. Flanigan, a director of the company and President of GR7 Holdings Inc., controls these securities.
(15) Includes 50,000 shares issuable upon exercise of January 2022 Warrants.
(16) John G. Proust, a director of the Company and the sole trustee of the Gwen Proust 2018 Alter Ego Trust, controls these securities.
(17) Includes 700,000 shares issuable upon exercise of January 2022 Warrants.
(18) Hanif Jamal, the President of H. Jamal Holdings Ltd., controls these securities.
(19) Includes 62,500 shares issuable upon exercise of January 2022 Warrants.
(20) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(21) John Graham Proust is a director of the Company. See also Note (16).
(22) Shares issuable upon exercise of February 2022 Stock Options.
(23) Includes 50,000 shares issuable upon exercise of January 2022 Warrants.
(24) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(25) Includes 62,500 shares issuable upon exercise of January 2022 Warrants.
(26) Lawrence Ward Lepard is a director of the Company. See also Note (8) and Note (39).
(27) Includes 150,000 shares issuable upon exercise of January 2022 Warrants and 100,000 shares issuable upon exercise of February 2022 Stock Options.
(28) Maria D. Furman, the beneficial owner, controls these securities.
(29) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(30) Murray Guinn Flanigan is a director of the Company.

(31) Shares issuable upon exercise of February 2022 Stock Options.
(32) Daniel Oliver Jr., the Managing Member of Myrmikan Gold Fund LLC, controls these securities.
(33) Includes 625,000 shares issuable upon exercise of January 2022 Warrants.
(34) Robert Cunjak, the beneficial owner, controls these securities.
(35) Includes 62,500 shares issuable upon exercise of January 2022 Warrants.
(36) Includes 37,500 shares issuable upon exercise of January 2022 Warrants.
(37) Includes 62,500 shares issuable upon exercise of January 2022 Warrants.
(38) Includes 125,000 shares issuable upon exercise of January 2022 Warrants.
(39) Lawrence Ward Lepard, the Managing General Partner of EMA along with David A. Foley, Managing Partner of EMA, controls these securities.
(40) Includes 500,000 shares issuable upon exercise of January 2022 Warrants.
(41) Thomas Irving Vehrs is a director of the Company.
(42) Shares issuable upon exercise of February 2022 Stock Options.
(43) Peter Maxwell Edwards, the Managing Director of the trust, VBS Exchange Pty Ltd, controls these securities.
(44) Includes 500,000 shares issuable upon exercise of January 2022 Warrants.
(45) Vincent Wei-Jiun Boon is an officer of the Company.
(46) Shares issuable upon exercise of February 2022 Stock Options.

None of the Selling Shareholders has, or within the past three years has had, any position, office or material or family relationship with our company or any of our predecessors or affiliates, except as follows:

- Benjamin Mossman is a director and officer of our company.
- Eileen Au is an officer of our company
- Lawrence Lepard is a director of our company. Mr. Lepard holds securities of our company in his personal capacity and controls securities held by (a) certain of his family members, (b) EMA GARP FUND, L.P. in his capacity as the Managing General Partner of EMA and (c) SEA VIEW Investments LLC. in his capacity as the Managing General Partner of EMA.
- John Proust is a director of our company. Mr. Proust holds securities of our company in his personal capacity and controls securities held by Gwen Proust 2018 Alter Ego Trust.
- Murray Flanigan is a director of our company. Mr. Flanigan holds securities of our company in his personal capacity and controls securities held by GR7 Holdings Inc.
- Thomas Vehrs is a director of our company.
- Vince Boon is an officer of our company.

PLAN OF DISTRIBUTION

We are registering the Shares to permit the resale of those Shares under the Securities Act from time to time after the date of this prospectus at the discretion of the holders of such Shares. We will not receive any of the proceeds from the sale by the selling stockholders of the Shares. We will bear all fees and expenses incident to our obligation to register the Shares.

Each selling stockholder and any of their pledgees, assignees and successors-in-interest may, from time to time, sell any or all of their Shares on the CSE, the OTCQX, or any other stock exchange, market, quotation service or trading facility on which the shares are traded or in private transactions, provided that all applicable Canadian laws and other applicable local laws are satisfied. The selling stockholders may also sell their Shares directly or through one or more underwriters, broker-dealers, or agents. If the Shares are sold through underwriters or broker-dealers, the selling stockholders will be responsible for underwriting discounts or commissions or agent's commissions. The Shares may be sold in one or more transactions at fixed prices, at prevailing market prices at the time of the sale, at varying prices determined at the time of sale, or at negotiated prices. A selling stockholder may use any one or more of the following methods when selling shares:

- ordinary brokerage transactions and transactions in which the broker-dealer solicits purchasers;
- block trades in which the broker-dealer will attempt to sell the shares as agent but may position and resell a portion of the block as principal to facilitate the transaction;
- purchases by a broker-dealer as principal and resale by the broker-dealer for its account;

- an exchange distribution in accordance with the rules of the applicable exchange;
- privately negotiated transactions;
- settlement of short sales entered into after the effective date of the registration statement of which this prospectus is a part;
- broker-dealers may agree with the selling stockholders to sell a specified number of such shares at a stipulated price per share;
- through the writing or settlement of options or other hedging transactions, whether through an options exchange or otherwise;
- a combination of any such methods of sale; and
- any other method permitted pursuant to applicable law.

The selling stockholders may also sell shares pursuant to Rule 144 under the Securities Act, if available, rather than under this prospectus.

Any Shares offered by a selling stockholder by this prospectus that were acquired upon the exercise of January 2022 Warrants remain subject to Canadian resale restrictions which provide that unless permitted under Canadian securities legislation, a selling stockholder must not trade those Shares before May 29, 2022. Any shares offered by a selling stockholder by this prospectus that are acquired upon the exercise of February 2022 Stock Options will remain subject to a hold period expiring June 8, 2022 in accordance with CSE policies.

If the selling stockholders effect such transactions by selling Shares to or through underwriters, broker-dealers, or agents, such underwriters, broker-dealers, or agents may receive commissions in the form of discounts, concessions, or commissions from the selling stockholders or commissions from purchasers of the Shares for whom they may act as agent or to whom they may sell as principal (which discounts, concessions, or commissions as to particular underwriters, broker-dealers, or agents may be in excess of those customary in the types of transactions involved). Broker-dealers engaged by any selling stockholder may arrange for other brokers-dealers to participate in sales. Broker-dealers may receive commissions or discounts from the selling stockholder (or, if any broker-dealer acts as agent for the purchaser of shares, from the purchaser) in amounts to be negotiated, but, except as set forth in a supplement to this prospectus, in the case of an agency transaction not in excess of a customary brokerage commission in compliance with FINRA Rule 2440; and in the case of a principal transaction a markup or markdown in compliance with FINRA IM-2440.

In connection with sales of Shares or interests therein, the selling stockholders may enter into hedging transactions with broker-dealers or other financial institutions, which may in turn engage in short sales of the Shares in the course of hedging in positions they assume. The selling stockholders may also sell shares of Common Stock short and deliver Shares covered by this prospectus to close out their short positions and to return borrowed shares in connection with such short sales. The selling stockholders may also loan or pledge Shares to broker-dealers that in turn may sell such Shares. The selling stockholders may also enter into option or other transactions with broker-dealers or other financial institutions or the creation of one or more derivative securities which require the delivery to such broker-dealer or other financial institution of Shares offered by this prospectus, which Shares such broker-dealer or other financial institution may resell pursuant to this prospectus (as supplemented or amended to reflect such transaction).

The selling stockholders and any broker-dealers or agents that are involved in selling the Shares may be deemed to be "underwriters" within the meaning of the Securities Act, in connection with such sales. In such event, any commissions received by, or any discounts or concessions allowed to, any such broker-dealer or agent and any profit on the resale of any Shares purchased by them may be deemed to be underwriting commissions or discounts under the Securities Act. At the time a particular offering of the Shares is made, a prospectus supplement, if required, will be distributed that will set forth the aggregate amount of Shares being offered and the terms of the offering, including the name or names of any broker-dealers or agents, any discounts, commissions, and other terms constituting compensation from the selling stockholders and any discounts, commissions, or concessions allowed or re-allowed or paid to broker-dealers.

Each selling stockholder has informed us that it does not have any written or oral agreement or understanding, directly or indirectly, with any person to distribute the Shares.

Because the selling stockholders may be deemed to be "underwriters" within the meaning of the Securities Act, they will be subject to the prospectus delivery requirements of the Securities Act, including Rule 172 thereunder. Once this registration statement becomes effective, we intend to file the final prospectus with the SEC in accordance with SEC Rules 172 and 424. Provided we are not the subject of any SEC stop orders and we are not subject to any cease and desist proceedings, the obligation to deliver a final prospectus to a purchaser will be deemed to have been met.

There is no underwriter or coordinating broker acting in connection with the proposed sale of the resale shares by the selling stockholders.

Under the securities laws of some states, the Shares may be sold in such states only through registered or licensed brokers or dealers. In addition, in some states the Shares may not be sold unless such shares have been registered or qualified for sale in such state, or an exemption from registration or qualification is available and is complied with.

There can be no assurance that any selling stockholder will sell any or all of the Shares registered pursuant to the registration statement of which this prospectus forms a part.

Under applicable rules and regulations under the Exchange Act, any person engaged in the distribution of the Shares may not simultaneously engage in market making activities with respect to the Common Stock for the applicable restricted period, as defined in Regulation M, prior to the commencement of the distribution. In addition, the selling stockholders will be subject to applicable provisions of the Exchange Act, and the rules and regulations thereunder, including Regulation M, which may limit the timing of purchases and sales of shares of our Common Stock by the selling stockholders or any other person. All of the foregoing provisions may affect the marketability of the Shares and the ability of any person or entity to engage in market-making activities with respect to the Shares.

We will pay all expenses of the registration of the Shares, estimated to be approximately $23,714.07 in total, including, without limitation, SEC filing fees, expenses of compliance with state securities or "blue sky" laws, and legal and accounting fees; provided, however, that a selling stockholder will pay all underwriting discounts and selling commissions, if any. We will indemnify the selling stockholders against liabilities, including some liabilities under the Securities Act, in accordance with applicable registration rights agreements, if any, or the selling stockholders will be entitled to contribution. We may be indemnified by the selling stockholders against civil liabilities, including liabilities under the Securities Act, that may arise from any written information furnished to us by the selling stockholder specifically for use in this prospectus, in accordance with the related registration rights agreement, or we may be entitled to contribution.

We agreed to keep this prospectus effective until the earlier of (i) the date on which the Shares may be resold by the selling stockholders without registration and without the requirement to be in compliance with Rule 144(c)(1) and otherwise without restriction or limitation pursuant to Rule 144 or (ii) all of the Shares have been sold pursuant to this prospectus or Rule 144 under the Securities Act or any other rule of similar effect.

Once sold under the registration statement of which this prospectus forms a part, the Shares will be freely tradable in the hands of persons other than our affiliates.

DESCRIPTION OF CAPITAL STOCK

Common Stock

Our authorized capital consists of 400,000,000 shares of Common Stock with a par value of $0.001 per share. As of March 28, 2022, there were 32,787,798 shares of our Common Stock issued and outstanding.

Holders of our Common Stock have no preemptive rights to purchase additional shares of Common Stock or other subscription rights. The Common Stock carries no conversion rights and is not subject to redemption or to any sinking fund provisions. All of our issued Common Stock is entitled to share equally in dividends from sources legally available, when, as and if declared by our Board of Directors, and upon our liquidation or dissolution, whether voluntary or involuntary, to share equally in our assets available for distribution to security holders.

Our Board of Directors is authorized to issue additional shares of Common Stock not to exceed the amount authorized by our Articles of Incorporation, on such terms and conditions and for such consideration as the Board may deem appropriate without further security holder action.

Voting Rights

Each holder of our Common Stock is entitled to one vote per share on all matters on which such stockholders are entitled to vote. Since the Common Stock does not have cumulative voting rights, the holders of more than 50% of the shares voting for the election of directors can elect all the directors if they choose to do so and, in such event, the holders of the remaining shares will not be able to elect any person to the Board of Directors.

Dividend Policy

Holders of our Common Stock are entitled to dividends if declared by the Board of Directors out of funds legally available for the payment of dividends. Since our inception as a company on February 9, 2007, we have not declared any dividends, nor do we intend to issue any cash dividends in the future. Our foreseeable plans include retaining earnings, if any, to finance the development and expansion of our business.

RECENT UPDATES

Benjamin W. Mossman was a director and officer of Banks Island Gold Ltd. (**"Banks"**), a company formerly listed on the TSX Venture Exchange that traded under the symbol "BOZ", during the time it assigned itself into bankruptcy on January 7, 2016. Banks appointed D. Manning & Associates as trustee in the bankruptcy proceedings. Subsequent to the bankruptcy, FTI Consulting of Vancouver, BC, was appointed as receiver by a major secured creditor. The trustee subsequently applied to be discharged from its role as trustee, which was granted on April 4, 2018. To the best of Mr. Mossman's knowledge, the secured creditor has taken possession of the property as of this date. To date, Banks remains undischarged from the bankruptcy proceedings.

Mr. Mossman, Banks, and two other former employees of Banks, were subject to summary conviction proceedings commenced in August 2016 for alleged violations of the British Columbia provincial *Environmental Management Act* (the **"EMA"**), the Provincial Water Act, and the federal Fisheries Act. The charges are related to the active mining operations conducted by Banks at and on Banks Island, BC during the period from 2014 to 2016. The court found Mr. Mossman not guilty and acquitted him of all, but two, charges under the EMA and Fisheries Act. For those two minor offences, the court imposed a $15,000 global fine against Mr. Mossman. All charges were dropped against one former employee and against Banks, and the court dismissed all charges against the other former employee.

Subsequent to the decision, the Crown filed an appeal regarding certain of the original determinations as they relate to Mr. Mossman. The summary conviction appeal was heard by the BC Supreme Court in May 2019. In February 2020, the court issued its decision and ordered a new trial in the matter for Mr. Mossman and one of the former employees. However, Mr. Mossman's two convictions and $15,000 fine for minor offenses relating to the incident were also set aside by the court. Counsel for Mr. Mossman sought leave to appeal the BC Supreme Court decision to the BC Court of Appeal, which was dismissed as part of the order for a new trial. The Supreme Court of Canada recently dismissed Mr. Mossman's application to appeal the order for a new trial. The new trial is scheduled to commence on April 11, 2022. Counsel for Mr. Mossman expects the trial to be concluded by October 2022.

In a second trial, the Crown charged Mr. Mossman with obstruction of justice related to the investigation of the underlying charges laid under the EMA and the other provincial and federal environmental regulations. The court acquitted him of that charge on March 6, 2019. No appeal of the acquittal was filed by the Crown.

LEGAL MATTERS

The validity of the issuance of the Shares offered hereby has been passed upon for us by Securities Law USA, PLLC, Washington, DC.

INTERESTS OF EXPERTS

The financial statements as of July 31, 2021 and 2020 and for the years ended July 31, 2021 and 2020 incorporated by reference in this prospectus and in the registration statement have been so incorporated in reliance on the report of Davidson & Company LLP, an independent registered public accounting firm, incorporated herein by reference, given on the authority of said firm as experts in auditing and accounting.

None of the above experts has received, or is to receive, in connection with the offering, a substantial interest, direct or indirect, in our company or any of our subsidiaries nor were they connected with our company or any of our subsidiaries as a promoter, managing or principal underwriter, voting trustee, director, officer, or employee.

WHERE YOU CAN FIND MORE INFORMATION

We have filed with the SEC a registration statement on Form S-1, including exhibits and schedules, under the Securities Act with respect to the Shares of Common Stock to be sold in this offering. This prospectus and any prospectus supplement which form a part of the registration statement do not contain all of the information set forth in the registration statement or the exhibits and schedules filed therewith. For further information about us and the securities covered by this prospectus, please see the registration statement and the exhibits filed with the registration statement. Any statements made in this prospectus or any prospectus supplement concerning legal documents are not necessarily complete and you should read the documents that are filed as exhibits to the registration statement or otherwise filed with the SEC for a more complete understanding of the document or matter.

We file annual, quarterly and current reports, proxy statements and other information with the SEC. You may read, without charge, and copy, at prescribed rates, all or any portion of the registration statement or any reports, statements or other information in the files at the public reference room at the SEC's principal office at 100 F Street NE, Washington, D.C., 20549. You may request copies of these documents, for a copying fee, by writing to the SEC. You may call the SEC at 1-800-SEC-0330 for further information on the operation of its public reference room. Our filings, including the registration statement, are also available to you on the Internet website maintained by the SEC at http://www.sec.gov.

INFORMATION INCORPORATED BY REFERENCE

The SEC allows us to incorporate by reference into this prospectus the information in documents we file with it, which means that we can disclose important information to you by referring you to those documents. The information incorporated by reference is considered to be a part of this prospectus, and information that we file later with the SEC will automatically update and supersede this information. Any statement contained in any document incorporated or deemed to be incorporated by reference herein shall be deemed to be modified or superseded for purposes of this prospectus to the extent that a statement contained in or omitted from this prospectus or any accompanying prospectus supplement, or in any other subsequently filed document which also is or is deemed to be incorporated by reference herein, modifies or supersedes such statement. Any such statement so modified or superseded shall not be deemed, except as so modified or superseded, to constitute a part of this prospectus.

We incorporate by reference the documents listed below and all future documents that we file with the SEC under Section 13(a), 13(c), 14 or 15(d) of the Exchange Act prior to the termination of the offering of the Shares:

- our Annual Report on Form 10-K for the year ended July 31, 2021, filed on October 29, 2021;
- our Quarterly Report on Form 10-Q for the quarter ended October 31, 2021, filed on December 15, 2021;
- our Quarterly Report on Form 10-Q for the quarter ended January 31, 2022, filed on March 16, 2022, and
- our Current Reports on Form 8-K filed on January 4, 2022; January 13, 2022, January 31, 2022; February 8, 2022 (two reports); February 10, 2022; February 14, 2022; February 22, 2022;

We do not, however, incorporate by reference in this prospectus any documents or portions thereof that are not deemed "filed" with the SEC, including any information furnished pursuant to Item 2.02 or Item 7.01 of our Current Reports on Form 8-K unless, and except to the extent, specified in such Current Reports.

We will provide to each person, including any beneficial owner, to whom a prospectus is delivered a copy of any of the filings incorporated by reference (other than an exhibit to such filings, unless the exhibit is specifically incorporated by reference into the filing requested) at no cost, if you submit a request to us by writing or telephoning us at the following mailing address, email address or telephone number:

Rise Gold Corp.
Suite 650, 669 Howe Street
Vancouver, British Columbia V6C 0B4
Attn: Eileen Au
eau@jproust.ca
604-260-4577

Copies of these documents may also be accessed free of charge on our website at http://www.risegoldcorp.com.

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PART II

INFORMATION NOT REQUIRED IN PROSPECTUS

Item 13. Other Expenses of Issuance and Distribution.

The following table lists the costs and expenses for which we have assumed sole responsibility and that we have paid or will pay in connection with the offering of securities covered by this prospectus, which do not include any sales commissions or discounts. All amounts are estimates except for the SEC registration fee.

	Amount (US$)
SEC registration fee	$ 714.07
Accounting fees and expenses	2,500
Legal fees and expenses	15,000
Printing fees and expenses	2,000
Transfer agent and registrar fees and expenses	2,500
Miscellaneous expenses	1,000
Total	$ 23,714.07

Item 14. Indemnification of Directors and Officers.

Nevada corporation law provides in Nevada Revised Statutes ("NRS") 78.7502 that:

- a corporation may indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative, except an action by or in the right of the corporation, by reason of the fact that the person is or was a director, officer, employee or agent of the corporation, or is or was serving at the request of the corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise, against expenses, including attorneys' fees, judgments, fines and amounts paid in settlement actually and reasonably incurred by the person in connection with the action, suit or proceeding if (a) the person is not liable pursuant to NRS 78.138, or (b) the person acted in good faith and in a manner which he or she reasonably believed to be in or not opposed to the best interests of the corporation, and, with respect to any criminal action or proceeding, had no reasonable cause to believe the conduct was unlawful;

- a corporation may indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending or completed action or suit by or in the right of the corporation to procure a judgment in its favor by reason of the fact that the person is or was a director, officer, employee or agent of the corporation, or is or was serving at the request of the corporation as a director, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise against expenses, including amounts paid in settlement and attorneys' fees actually and reasonably incurred by the person in connection with the defense or settlement of the action or suit if (a) the person is not liable pursuant to NRS 78.138, or (b) the person acted in good faith and in a manner which he or she reasonably believed to be in or not opposed to the best interests of the corporation. Indemnification may not be made for any claim, issue or matter as to which such a person has been adjudged by a court of competent jurisdiction, after exhaustion of all appeals therefrom, to be liable to the corporation or for amounts paid in settlement to the corporation, unless and only to the extent that the court in which the action or suit was brought or other court of competent jurisdiction determines upon application that in view of all the circumstances of the case, the person is fairly and reasonably entitled to indemnity for such expenses as the court deems proper; and

- to the extent that a director, officer, employee or agent of a corporation has been successful on the merits or otherwise in defense of any action, suit or proceeding referred to in the two paragraphs above, or in defense of any claim, issue or matter therein, the corporation shall indemnify him or her against expenses, including attorneys' fees, actually and reasonably incurred by him or her in connection with the defense.

NRS 78.7502.3 provides that we may make any discretionary indemnification pursuant to NRS 78.7502 only as authorized in the specific case upon a determination that indemnification of the director, officer, employee or agent is proper in the circumstances. The determination must be made:

- by our stockholders;
- by our board of directors by majority vote of a quorum consisting of directors who were not parties to the action, suit or proceeding;
- if a majority vote of a quorum consisting of directors who were not parties to the action, suit or proceeding so orders, by independent legal counsel in a written opinion;
- if a quorum consisting of directors who were not parties to the action, suit or proceeding cannot be obtained, by independent legal counsel in a written opinion; or
- by court order.

The indemnification pursuant to NRS 78.7502 and advancement of expenses authorized in or ordered by a court pursuant to NRS 78.751.2:

- does not exclude any other rights to which a person seeking indemnification or advancement of expenses may be entitled under the articles of incorporation or any bylaw, agreement, vote of stockholders or disinterested directors or otherwise, for either an action in the person's official capacity or an action in another capacity while holding office, except that indemnification, unless ordered by a court pursuant to NRS 78.7502 or for the advancement of expenses made pursuant to NRS 78.751.2, may not be made to or on behalf of any director or officer finally adjudged by a court of competent jurisdiction, after exhaustion of any appeals taken therefrom, to be liable for intentional misconduct, fraud or a knowing violation of law, and such misconduct, fraud or violation was material to the cause of action; and
- continues for a person who has ceased to be a director, officer, employee or agent and inures to the benefit of the heirs, executors and administrators of such a person.

Our bylaws provide that:

- The directors of the Company shall cause the Company to indemnify a director or former director of the Company and the directors may cause the Company to indemnify a director or former director of a corporation of which the Company is or was a shareholder and the heirs and personal representatives of any such person against all costs, charges and expenses, including an amount paid to settle an action or satisfy a judgment, actually and reasonably incurred by him or her including an amount paid to settle an action or satisfy a judgment in any criminal or administrative action or proceeding to which he or she is made a party by reason of his or her being or having been a director of the Company or a director of such corporation, including an action brought by the Company or corporation. Each director of the Company on being elected or appointed is deemed to have contracted with the Company on the terms of the foregoing indemnity.
- The directors of the Company may cause the Company to indemnify an officer, employee or agent of the Company or of a corporation of which the Company is or was a shareholder (notwithstanding that he or she is also a director of the Company) and his or her heirs and personal representatives against all costs, charges and expenses incurred by him or her and resulting from his or her acting as an officer, employee or agent of the Company or the corporation. In addition, the Company shall indemnify the secretary or assistant secretary of the Company (if he or she is not a full time employee of the Company and notwithstanding that he or she is also a director of the Company) and his or her respective heirs and legal representatives against all costs, charges and expenses incurred by him or her and arising out of the functions assigned to the secretary by law or the articles of incorporation of the Company, and each secretary and assistant secretary, on being appointed is deemed to have contracted with the Company on the terms of the foregoing indemnity.

- The directors of the Company may cause the Company to purchase and maintain insurance for the benefit of a person who is or was serving as a director, officer, employee or agent of the Company or as a director, officer, employee or agent of a corporation of which the Company is or was a shareholder and his or her heirs or personal representatives against a liability incurred by him as a director, officer, employee or agent.

Item 15. Recent Sales of Unregistered Securities.

During the past three years, we have issued the following securities without registration under the Securities Act outside the United States pursuant to the exclusion from registration provided under Rule 903 of Regulation S and inside the United States pursuant to the exemptions from registration provided Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder, in each case in reliance upon the representations received from the purchasers of those securities.

On July 3, 2019, we completed the sale of an aggregate of 1,036,813 units at a price of $0.50 (C$0.70) per unit for gross proceeds of $552,000 (C$725,769). Each unit consisted of one share of our Common Stock and half of one non-transferable share purchase warrant, each whole warrant exercisable into one additional share of Common Stock at a price of $0.80 (C$1.00) until July 3, 2022. We issued the shares and warrants underlying the units sold in reliance on Rule 903 of Regulation S for offers and sales outside of the United States and Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder for offers and sales in the United States and to U.S. persons. Our reliance on Rule 903 was based on the fact that the securities were sold in offshore transactions. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and none of the purchasers of those securities was a U.S. person or acquired the securities for the account or benefit of any U.S. person. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the U.S. investors provided us with written representations regarding their investment intent and status as an accredited investor, and that neither we nor anyone acting on our behalf engaged in any general advertising or general solicitation.

On August 19, 2019, we completed the sale of an aggregate of 4,582,644 units at a price of $0.53 (C$0.70) per unit for gross proceeds of $2,412,281 (C$3,207,850). Each unit consisted of one share of our Common Stock and half of one non-transferable share purchase warrant, each whole warrant exercisable into one additional share of Common Stock at a price of $0.80 (C$1.00) until August 19, 2022. We issued the shares and warrants underlying the units sold in reliance on Rule 903 of Regulation S for offers and sales outside of the United States and Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder for offers and sales in the United States and to U.S. persons. Our reliance on Rule 903 was based on the fact that the securities were sold in offshore transactions. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and none of the purchasers of those securities was a U.S. person or acquired the securities for the account or benefit of any U.S. person. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the U.S. investors provided us with written representations regarding their investment intent and status as an accredited investor, and that neither we nor anyone acting on our behalf engaged in any general advertising or general solicitation.

On August 21, 2019, we granted a total of 751,284 incentive stock options pursuant to our stock option plan to various directors, officers and consultants including: 461,284 to our Chief Executive Officer, Benjamin W. Mossman; 75,000 to John Proust, a member of our Board of Directors; 40,000 to Thomas I. Vehrs, a member of our Board of Directors; 40,000 to Murray Flanigan, a member of our Board of Directors and 100,000 to Lawrence W. Lepard, a member of our Board of Directors; 10,000 to Vince Boon, our Chief Financial Officer; and 10,000 to Eileen Au, our corporate secretary. The remaining 15,000 options were granted to some of our consultants who were eligible to participate in our stock option plan. Each option vested immediately and is exercisable into one share of our Common Stock at a price of $0.50 (C$0.70) per share until August 21, 2024. We granted the options in reliance on Rule 903 of Regulation S for grants outside of the United States and Section 4(a)(2) of the Securities Act for grants in the United States and to U.S. persons. Our reliance on Rule 903 of Regulation S was based on the fact that the securities were offered and sold in an offshore transaction. We did not engage in any directed selling efforts in the United States in connection with the grant of the securities and none of the persons receiving those securities was a U.S. person, nor did they acquire the securities for the account or for the benefit of any U.S. person. Our reliance on Section 4(a)(2) was based on the availability to the grantees of the incentive stock options of information regarding our company and our properties and operations and the private nature of the transactions.

On September 9, 2019 in conjunction with a debt financing, we issued 1,150,000 share purchase warrants to a lender as partial consideration for a secured $1,000,000 (C$1,316,450) loan. Each warrant entitles the holder to acquire one share of Common Stock at an exercise price of $0.80 (C$1.00) until September 9, 2022. We issued the warrants in reliance on Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the lender provided us with written representations regarding its investment intent and status as an accredited investor, the availability to the lender of information regarding our company and our properties and operations, and the private nature of the transaction.

On March 17, 2020, we granted 75,000 incentive stock options pursuant to our stock option plan to a consultant eligible to participate in our stock option plan. Each option vested immediately and is exercisable into one share of our Common Stock at a price of $0.50 (C$0.70) per share until March 17, 2023. We granted the options in reliance on Rule 903 of Regulation S for grants outside of the United States and Section 4(a)(2) of the Securities Act for grants in the United States and to U.S. persons. Our reliance on Rule 903 of Regulation S was based on the fact that the securities were offered and sold in an offshore transaction. We did not engage in any directed selling efforts in the United States in connection with the grant of the securities and none of the persons receiving those securities was a U.S. person, nor did they acquire the securities for the account or for the benefit of any U.S. person. Our reliance on Section 4(a)(2) was based on the availability to the grantees of the incentive stock options of information regarding our company and our properties and operations and the private nature of the transactions.

On July 31, 2020, we completed the sale of an aggregate of 4,363,833 units at a price of $0.75 (C$1.00) per unit for gross proceeds of $3,272,875 (C$4,386,200). Each unit consisted of one share of our Common Stock and half of one non-transferable share purchase warrant, each whole warrant exercisable into one additional share of Common Stock at a price of $1.00 (C$1.30) until July 31, 2022. We issued the shares and warrants underlying the units sold in reliance on Rule 903 of Regulation S for offers and sales outside of the United States and Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder for offers and sales in the United States and to U.S. persons. Our reliance on Rule 903 was based on the fact that the securities were sold in offshore transactions. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and none of the purchasers of those securities was a U.S. person or acquired the securities for the account or benefit of any U.S. person. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the U.S. investors provided us with written representations regarding their investment intent and status as an accredited investor, and that neither we nor anyone acting on our behalf engaged in any general advertising or general solicitation. In conjunction with this investment, we issued 43,435 share purchase warrants as a finder's fee. Each finder's warrant entitles the holder to acquire one share of Common Stock at an exercise price of $1.00 (C$1.30) until July 31, 2022. We issued the finder's warrants in reliance on Rule 903 of Regulation S. Our reliance on Rule 903 was based on the fact that the finder's warrants were issued in an offshore transaction. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and the purchaser of the securities was not a U.S. person and did not acquire the securities for the account or benefit of a U.S. person.

On September 21, 2020, we completed the sale of an aggregate of 333,333 units at a price of $0.75 (C$1.02) per unit for gross proceeds of $250,000 (C$332,733). Each unit consisted of one share of our Common Stock and half of one non-transferable share purchase warrant, each whole warrant exercisable into one additional share of Common Stock at a price of $1.00 (C$1.36) until September 21, 2022. We issued the shares and warrants underlying the units sold in reliance on Rule 903 of Regulation S for offers and sales outside of the United States and Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder for offers and sales in the United States and to U.S. persons. Our reliance on Rule 903 was based on the fact that the securities were sold in offshore transactions. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and none of the purchasers of those securities was a U.S. person or acquired the securities for the account or benefit of any U.S. person. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the U.S. investors provided us with written representations regarding their investment intent and status as an accredited investor, and that neither we nor anyone acting on our behalf engaged in any general advertising or general solicitation.

On September 22, 2020, we granted 1,338,500 incentive stock options pursuant to our stock option plan to our Chief Executive Officer, Benjamin W. Mossman. Each option vested immediately and is exercisable into one share of our Common Stock at a price of $0.90 (C$1.20) per share until September 22, 2025. We granted the options in reliance on Section 4(a)(2) of the Securities Act. Our reliance on Section 4(a)(2) was based on the availability to the grantee of the incentive stock options of information regarding our company and our properties and operations and the private nature of the transaction.

On January 28, 2022, we completed the sale of an aggregate of 6,017,500 units at a price of $0.40 (C$0.50) per unit for gross proceeds of $250,000 (C$332,733). Each unit consisted of one share of our Common Stock and one transferable share purchase warrant, each warrant exercisable into one additional share of Common Stock at a price of $0.60 until January 28, 2024. We issued the shares and warrants underlying the units sold in reliance on Rule 903 of Regulation S for offers and sales outside of the United States and Section 4(a)(2) of the Securities Act and Rule 506(b) of Regulation D thereunder for offers and sales in the United States and to U.S. persons. Our reliance on Rule 903 was based on the fact that the securities were sold in offshore transactions. We did not engage in any directed selling efforts in the United States in connection with the sale of the securities, and none of the purchasers of those securities was a U.S. person or acquired the securities for the account or benefit of any U.S. person. Our reliance on Section 4(a)(2) and Rule 506(b) was based on the fact that the U.S. investors provided us with written representations regarding their investment intent and status as an accredited investor, and that neither we nor anyone acting on our behalf engaged in any general advertising or general solicitation.

On February 7, 2022, we granted a total of 805,000 incentive stock options pursuant to our stock option plan to various directors, officers and employees including: 300,000 to our Chief Executive Officer, Benjamin W. Mossman; 100,000 to John Proust, a member of our Board of Directors; 100,000 to Thomas I. Vehrs, a member of our Board of Directors; 100,000 to Murray Flanigan, a member of our Board of Directors and 100,000 to Lawrence W. Lepard, a member of our Board of Directors; 40,000 to Vince Boon, our Chief Financial Officer; and 40,000 to Eileen Au, our corporate secretary. The remaining 25,000 options were granted to one of our employees who was eligible to participate in our stock option plan. Each option vested immediately and is exercisable into one share of our Common Stock at a price of $0.65 per share until February 7, 2027. We granted the options in reliance on Section 4(a)(2) of the Securities Act. Our reliance on Section 4(a)(2) was based on the availability to the grantees of the incentive stock options of information regarding our company and our properties and operations and the private nature of the transactions.

Item 16. Exhibits and Financial Statement Schedules.

(a) Exhibits

The Exhibits filed herewith are set forth on the Index to Exhibits filed as a part of this registration statement beginning on page II-8 hereof.

Item 17. Undertakings.

The undersigned registrant hereby undertakes:

(1) To file, during any period in which offers or sales are being made, a post-effective amendment to this registration statement:

(i) To include any prospectus required by Section 10(a)(3) of the Securities Act;

(ii) To reflect in the prospectus any facts or events arising after the effective date of the registration statement (or the most recent post-effective amendment thereof) which, individually or in the aggregate, represent a fundamental change in the information set forth in the registration statement. Notwithstanding the foregoing, any increase or decrease in volume of securities offered (if the total dollar value of securities offered would not exceed that which was registered) and any deviation from the low or high end of the estimated maximum offering range may be reflected in the form of prospectus filed with the Commission pursuant to Rule 424(b) if, in the aggregate, the changes in volume and price represent no more than a 20% change in the maximum aggregate offering price set forth in the "Calculation of Registration Fee" table in the effective registration statement; and

(iii) To include any material information with respect to the plan of distribution not previously disclosed in the registration statement or any material change to such information in the registration statement;

provided, however, that paragraphs (i), (ii) and (iii) above do not apply if the information required to be included in a post-effective amendment by those paragraphs is contained in reports filed with or furnished to the Commission by the registrant pursuant to section 13 or section 15(d) of the Exchange Act that are incorporated by reference in the registration statement.

(2) That, for the purpose of determining any liability under the Securities Act, each such post-effective amendment shall be deemed to be a new registration statement relating to the securities offered therein, and the offering of such securities at that time shall be deemed to be the initial bona fide offering thereof.

(3) To remove from registration by means of a post-effective amendment any of the securities being registered which remain unsold at the termination of the offering.

(4) That for determining liability under the Securities Act to any purchaser, each prospectus filed pursuant to Rule 424(b) as part of a registration statement relating to an offering, other than registration statements relying on Rule 430B or other than prospectuses filed in reliance on Rule 430A, shall be deemed to be part of and included in the registration statement as of the date it is first used after effectiveness. *Provided, however,* that no statement made in a registration statement or prospectus that is part of the registration statement or made in a document incorporated or deemed incorporated by reference into the registration statement or prospectus that is part of the registration statement will, as to a purchaser with a time of contract of sale prior to such first use, supersede or modify any statement that was made in the registration statement or prospectus that was part of the registration statement or made in any such document immediately prior to such date of first use.

(5) That, for purposes of determining any liability under the Securities Act, each filing of the registrant's annual report pursuant to section 13(a) or section 15(d) of the Exchange Act that is incorporated by reference in the registration statement shall be deemed to be a new registration statement relating to the securities offered therein, and the offering of such securities at that time shall be deemed to be the initial bona fide offering thereof.

(6) Insofar as indemnification for liabilities arising under the Securities Act may be permitted to directors, officers and controlling persons of the registrant pursuant to the foregoing provisions, or otherwise, the registrant has been advised that in the opinion of the Securities and Exchange Commission such indemnification is against public policy as expressed in the Securities Act, and is, therefore, unenforceable. In the event that a claim for indemnification against such liabilities (other than the payment by the registrant of expenses incurred or paid by a director, officer or controlling person of the registrant in the successful defense of any action, suit or proceeding) is asserted by such director, officer or controlling person in connection with the securities being registered, the registrant will, unless in the opinion of its counsel the matter has been settled by controlling precedent, submit to a court of appropriate jurisdiction the question whether such indemnification by it is against public policy as expressed in the Securities Act and will be governed by the final adjudication of such issue.

SIGNATURES

Pursuant to the requirements of the Securities Act of 1933, the registrant has duly caused this registration statement to be signed on its behalf by the undersigned, thereunto duly authorized, in Nevada, California, USA on March 29, 2022.

Rise Gold Corp.

By: /s/ Benjamin Mossman
Benjamin Mossman, Chief Executive Officer and President

Pursuant to the requirements of the Securities Act of 1933, this registration statement has been signed by the following persons in the capacities and on the dates indicated.

Name	Title	Date
By: /s/ Benjamin Mossman Benjamin Mossman	Chief Executive Officer, President and Director (Principal Executive Officer)	March 29, 2022
By: /s/ Vincent Boon Vincent Boon	Chief Financial Officer and Treasurer (Principal Financial Officer and Principal Accounting Officer)	March 29, 2022
By: /s/ Murray Flanigan Murray Flanigan	Director	March 29, 2022
By: /s/ John Proust John Proust	Director	March 29, 2022
By: /s/ Thomas Vehrs Thomas Vehrs	Director	March 29, 2022
By: /s/ Lawrence Lepard Lawrence Lepard	Director	March 29, 2022

EXHIBIT INDEX

Exhibit No.	Document
3.1	Articles of Incorporation, as amended through March 29, 2017 (1)
3.2	Certificate of Change made effective December 16, 2019 (7)
3.3	Certificate of Amendment dated September 18, 2020 (7)
3.4	Bylaws (2)
5.1	Legal opinion of Securities Law USA, PLLC *
10.1	Incentive Stock Option Plan dated March 23, 2016 (1)
10.2	Employment Agreement with Benjamin Mossman dated as of April 19, 2017 (1)
10.3	Amendment dated April 16, 2018 to the Employment Agreement with Benjamin Mossman dated as of April 19, 2017 (3)
10.4	Form of Subscription Agreement with Meridian Jerritt Canyon Corp., a wholly-owned subsidiary of Yamana Gold Inc., dated October 16, 2018 (4)
10.5	Consulting Agreement with J. Proust & Associates Inc., as amended, dated December 13, 2018 (5)
10.6	Loan Agreement between Rise Grass Valley Inc. and Eridanus Capital, LLC dated August 30, 2019 (6)
10.7	Collateral Agreement in favor of Eridanus Capital, LLC, dated August 30, 2019 (6)
10.8	Deed of Trust in favor of Jeremy A. M. Evans, as trustee, for the benefit of Eridanus Capital, LLC dated August 30, 2019 (6)
21.1	Subsidiaries of the registrant (1)
23.1	Consent of Davidson & Company *
23.2	Consent of Securities Law USA, PLLC (contained in Exhibit 5.1) *
107	Filing Fee Tables *

* Filed herewith

(1) Previously included as an exhibit to our Form S-1 registration statement filed on September 5, 2017 and incorporated herein by reference

(2) Previously included as an exhibit to our Form S-1 registration statement filed on February 19, 2008 and incorporated herein by reference

(3) Previously included as an exhibit to our Form S-1 registration statement filed on May 29, 2018 and incorporated herein by reference

(4) Previously included as an exhibit to post-effective Amendment No. 1 to our Form S-1 registration statement filed on November 26, 2018 and incorporated herein by reference

(5) Previously included as an exhibit to our Form S-1 registration statement filed on January 17, 2019 and incorporated herein by reference

(6) Previously included as an exhibit to our annual report on Form 10-K filed on October 29, 2019 and incorporated herein by reference

(7) Previously included as an exhibit to our annual report on Form 10-K filed on October 29, 2020 and incorporated herein by reference

SECURITIES
LAW USA

10 G Street, NE, Suite 600
Washington, DC 20002
Tel (202) 539-8449 • Fax (661) 438-3080
ww.seclawusa.com

J. BRAD WIGGINS
bwiggins@seclawusa.com
Tel (661) 713-6843
licensed in dc and ca

March 29, 2022

Rise Gold Corp.
Suite 650 - 669 Howe Street
Vancouver, British Columbia V6C 0B4

Ladies and Gentlemen:

You have requested our opinion with respect to certain matters in connection with the filing with the Securities and Exchange Commission (the "**Commission**") by Rise Gold Corp., a Nevada corporation (the "**Company**"), of a Registration Statement on

SECURITIES LAW USA

March 29, 2022
Page 2

We have also assumed that (i) the Registration Statement and any amendments thereto (including post-effective amendments) will have become effective and will continue to be effective at the time of any resale of the Shares, (ii) if necessary, a Prospectus supplement will have been prepared and filed with the Commission describing any Shares offered thereby by any Selling Stockholders, (iii) all Shares will be sold in the manner stated in the Registration Statement and, if necessary, the applicable Prospectus supplement, and (iv) at the time of the offering, there will not have occurred any changes in the law affecting the authorization, execution, delivery, validity or enforceability of the Shares. The opinion set forth in this letter is limited solely to the federal laws of the United States and the applicable laws of the State of Nevada. We express no opinion with respect to any other laws.

Based upon the foregoing, and in reliance thereon, we are of the opinion that:

1. The Outstanding Shares are validly issued, fully paid and nonassessable.

2. Upon the due exercise of the Warrants in accordance with their terms, the Warrant Shares will be validly issued, fully paid and nonassessable.

3. Upon the due exercise of the Options in accordance with their terms, the Option Shares will be validly issued, fully paid and nonassessable.

We consent to the reference to our firm under the caption "Legal Matters" in the Prospectus included in the Registration Statement and to the filing of this opinion as an exhibit to the Registration Statement. In giving our consent, we do not admit that we are "experts" within the meaning of Section 11 of the Securities Act or within the category of persons whose consent is required by Section 7 of the Securities Act or the rules and regulations of the Commission.

Sincerely,

/s/ SecuritiesLawUSA, PLLC

SecuritiesLawUSA, PLLC

DAVIDSON & COMPANY LLP — Chartered Professional Accountants

CONSENT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

We hereby consent to the incorporation by reference in this Registration Statement on Form S-1 of our report dated October 28, 2021, relating to the consolidated financial statements of Rise Gold Corp., which is part of this Registration Statement.

We also consent to the reference to us under the caption "Interests of Experts" in the Prospectus.

/s/ DAVIDSON & COMPANY LLP

Vancouver, Canada — Chartered Professional Accountants

March 29, 2022

A member of Nexia International

1200 - 609 Granville Street, P.O. Box 10372, Pacific Centre, Vancouver, B.C., Canada V7Y 1G6
Telephone (604) 687-0947 Davidson-co.com

Exhibit 107

Calculation of Filing Fee Tables

Form S-1
(Form Type)

Rise Gold Corp.
(Exact Name of Registrant as Specified in its Charter)

Table 1: Newly Registered Securities

	Security Type	Security Class Title	Fee Calculation	Amount Registered(1)	Proposed Maximum Offering Price Per Unit	Maximum Aggregate Offering Price	Fee Rate	Amount of Registration Fee
Fees to be Paid	Equity	Common Stock, $0.001 par value per share	457(c)	6,017,500 (2)	$0.59315(3)	$3,569,280.13 (3)	0.0000927	$330.87
Fees to be Paid	Equity	Common Stock, $0.001 par value per share	Other	6,017,500 (4)	$0.60 (4)	$3,610,500	0.0000927	$334.69
Fees to be Paid	Equity	Common Stock, $0.001 par value per share	Other	805,000 (5)	$0.65 (5)	$523,250	0.0000927	$48.51
	Total Offering Amounts					$7,703,030.13		
	Total Fees Previously Paid							
	Total Fee Offsets							
	Net Fee Due							$714.07

(1) This registration statement also includes an indeterminate number of securities that may become offered, issuable or sold to prevent dilution resulting from stock splits, stock dividends and similar transactions, which are included pursuant to Rule 416 under the Securities Act of 1933, as amended.

(2) Consists of 6,017,500 shares of Common Stock offered by selling stockholders.

(3) Estimated solely for the purpose of calculating the registration fees pursuant to Rule 457(c) promulgated under the Securities Act based upon the average of the high and low prices of the Common Stock as quoted on the OTCQX on March 28, 2022, which was $0.59315.

(4) Consists of 6,017,500 shares of Common Stock issuable upon exercise of common stock purchase warrants held by selling stockholders exercisable at $0.60 per share

(5) Consists of 805,000 shares of Common Stock issuable upon exercise of incentive stock options held by selling stockholders exercisable at $0.65 per share.

Table 2: Fee Offset Claims and Sources

Form S-1 (the "**Registration Statement**"), including that certain related prospectus to be filed with the Commission (the "**Prospectus**") under the Securities Act of 1933, as amended (the "**Securities Act**"), relating to the resale from time to time by the selling stockholders named in the Prospectus (the "**Selling Stockholders**") of up to a total of 12,840,000 shares of the Company's common stock, $0.001 par value (the "**Shares**"), consisting of up to:

(i) 6,017,500 outstanding Shares (the "**Outstanding Shares**");

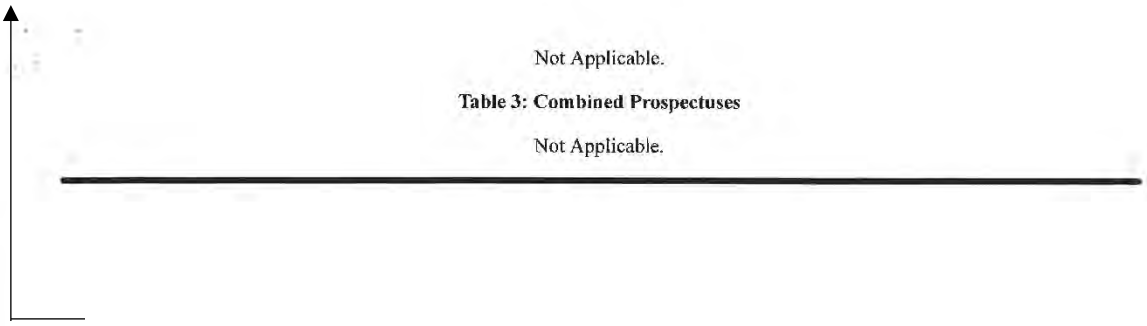
(ii) 6,017,500 Shares (the "**Warrant Shares**") issuable upon exercise of common stock purchase warrants issued January 28, 2022 and exercisable at a price per Share of $0.60 until January 28, 2024 (the "**Warrants**"); and

(iii) 805,000 Shares (the "**Option Shares**") issuable upon exercise of incentive stock options issued February 7, 2022 and exercisable at a price per Share of $0.65 until February 7, 2027 (the "**Options**").

In connection with this opinion, we have examined and relied upon the Registration Statement and related Prospectus; the Company's articles of incorporation, as amended to date; the Company's Bylaws as in effect on the date hereof; the form of certificates representing the Warrants; the form of certificates representing the Options; and certain resolutions and minutes of meetings of the Board of Directors of the Company relating to the issuance of the Outstanding Shares, the Warrants, the Warrant Shares, the Options, and the Options Shares and the filing of the Registration Statement.

We have considered such matters of law and of fact, including the examination of originals or copies, certified or otherwise identified to our satisfaction, of such records, documents, certificates, and other instruments of the Company, certificates of officers, directors and representatives of the Company, certificates of public officials, and such other documents as in our judgment are necessary or appropriate to enable us to render the opinion expressed below.

As to matters of fact material to our opinion, we have relied, without independent verification, on certificates and other inquiries of officers of the Company. We have assumed without investigation the genuineness and authenticity of all documents submitted to us as originals, the conformity to originals of all documents submitted to us as copies thereof, and the due execution and delivery of all documents where due execution and delivery are a prerequisite to the effectiveness thereof, the accuracy and completeness of all records made available to us by the Company, and that all offers and sales of the Shares will be made in compliance with the securities laws of the states having jurisdiction thereof.



Not Applicable.

Table 3: Combined Prospectuses

Not Applicable.

INDIVIDUAL LETTER 85: CAROL TODD

Response to Comment Ind 85-1

The referenced attachment refers to the Project Applicant's financial wherewithal to complete the proposed project, which is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Response to Comment Ind 85-2

Potential impacts related to dust generation and noise associated with the proposed project are discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy and Chapter 4.10, Noise and Vibration, of the DEIR, respectively.

Response to Comment Ind 85-3

See Response to Comment 85-1.

Individual Letter 86

CAROLEE WEISBERG
134 BERRIMAN LOOP
GRASS VALLEY, CA 95949
caroleestrong@gmail.com
530-263-3026

February 14, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

Ind 86-1 I oppose to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Raise Gold Corporation to be inconsistent, misleading, and manipulative. They fail to mitigate significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are multiple reasons this mine should NOT reopen. My personal reasons are:

Ind 86-2 1- The mine will pollute our air and increase lung disease.
2- Clouds of airborne toxic mining dust, including asbestos, will drift downwards into Grass Valley.
Ind 86-3 3- Hard rock mining is the single largest source of toxic waste in the United States.
Ind 86-4 4- Trucks hauling 1,000 tons of waste rock, making one hundred trips every day down Brunswick Road, piling it higher that a 6-story building at the Centennial site.
Ind 86-5 5- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
6- Crushing of 1,500 tons of waste rock every day, all day, and using massive machines.

Ind 86-6 I am a resident of Nevada County and observe that Rise Gold Corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Raise Gold Corporation has developed.

Sincerely,

Carolee Weisberg



INDIVIDUAL LETTER 86: CAROLEE WEISBERG

Response to Comment Ind 86-1
Please see Master Response 1.

Response to Comment Ind 86-2
Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution. As evaluated under Impact 4.3-2, and shown in Table 4.3-21, emissions of toxic air contaminants (TACs) would not result in health risks to nearby receptors in excess of NSAQMD thresholds. Nonetheless, Mitigation Measure 4.3-2 was included to ensure an Asbestos Dust Mitigation Plan is prepared, as required by the California Air Resources Board (CARB).

Response to Comment Ind 86-3
Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for more information related to mining waste. Please see also Master Response 8.

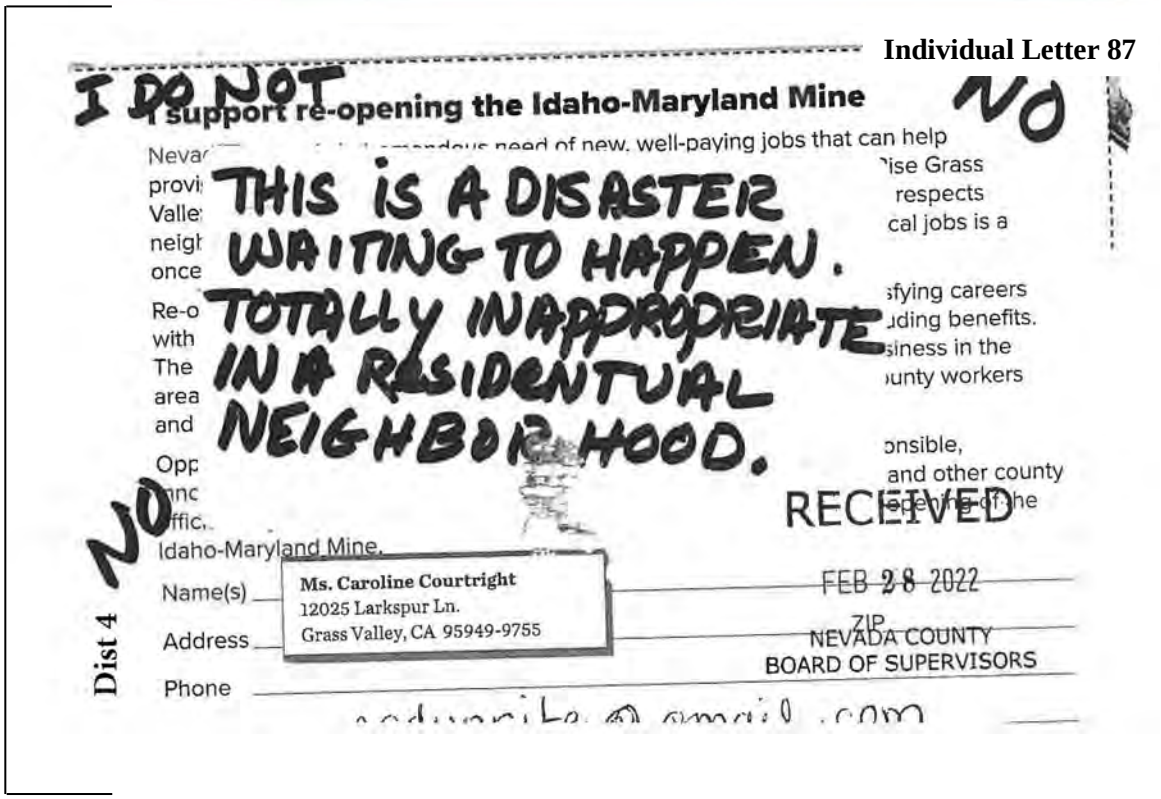
Response to Comment Ind 86-4
Please refer to Chapter 4.12, Transportation, of the DEIR for more information related to hauling truck traffic.

Response to Comment Ind 86-5
Please refer to Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.10, Noise and Vibration, of the DEIR for more information related to blasting.

Response to Comment Ind 86-6
Please see Master Response 3.

Individual Letter 87

Ind 87-1



I DO NOT support re-opening the Idaho-Maryland Mine NO

THIS IS A DISASTER WAITING TO HAPPEN. TOTALLY INAPPROPRIATE IN A RESIDENTUAL NEIGHBORHOOD.

NO

Dist 4

Idaho-Maryland Mine.

Name(s) Ms. Caroline Courtright

Address 12025 Larkspur Ln. Grass Valley, CA 95949-9755

Phone

RECEIVED
FEB 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 87: CAROLINE COURTRIGHT

Response to Comment Ind 87-1

Please see Master Response 1.

Individual Letter 88

From: Caroline Courtright
To: BOS Public Comment
Subject: Idaho Maryland Mine Proposal
Date: Tuesday, March 22, 2022 1:39:44 PM
Attachments: ACFrOaB_YICFPVo-dKS3wSw-2X6X46WEiPq7Mzc-H27wEwA020PukTV1wO6SS9vsPOS2ymuKZySo1yMqHzna4NCpvzBD1adhOTdx7BwtHmISRCdaDaLOaNOBRN8Bzak=.pdf

Dist 4

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from Caroline Courtright
resident district 4
12025 Larkspur Lane
Grass Valley, ca 95949

Ind 88-1

I would like a copy of the enclosed letter to go to all 5 supervisors please. But of course especially Susan Hoek, my Dist. 4 supervisor, and Dan Miller Dist.3 Supervisor.
Please deliver this letter to them before the Thursday 3/24 Planning Commission meeting on the subject. Thank you.
Caroline Courtright

Ind 88-2

To whom it may concern: 3/9/2022 The Idaho-Maryland Mine Project is a bad idea for the community. I am writing from Philadelphia, PA, and am the son-in-law of a Grass Valley resident, Caroline Courtright. I have been a corporate bond analyst for 16 years, covered the metals and mining sector for roughly 5 years, and that included gold miners. So, my perspective is from a financial analyst. That said, I am writing you on a personal level and not from my employer's perspective. I assume you will hear significant doubts about the negative environmental impacts the mine will have from other concerned citizens. Even though I agree with the opponents of the mine reopening on an Environmental, Social, and Governance (ESG) basis, I wanted to provide doubts on a financial basis. Caroline told me about the potential of the mine reopening about 10 years ago following gold prices rising during that time. I thought it would be a near impossible act to reopen the mine in the middle of two cities then, largely because it would be too expensive to restart and operate the mine among an area that values the environment the way Nevada County residents do. Recently, I learned of the EIR that supports the mine reopening, so I wanted to learn more about the project as a potential investment, after all, Rise Gold is a publicly traded company. I am appalled by the fact that there is so little financial information available from Rise Gold. Other investable gold miners utilize a metric called "All-In Sustaining Costs" (AISC) to describe the cost to produce one ounce of gold. AISC's line items include cost of sales excluding depreciation and amortization, royalties, and production taxes but includes treatment and refinement charges. In addition, AISC's additional costs include sustaining capital expenditures, leases, general and administrative costs, and minesite exploration and evaluation costs. The lowest cost gold miner can operate in the $1,000/ounce area (Barrick Gold) and other higher cost operators (New Gold) operate in the $1,500/ounce range. This variance is largely due to by-product credits (Barrick's mines contain copper as well as gold). Simply put, if gold prices fall below $1,500/ounce, New Gold would stop mining gold because it would be losing money. Rise

Gold has not published its expectations for AISC. I think this information is pertinent because that metric would inform Grass Valley and Nevada City citizens and the potential employees of Rise Gold when the mine can be expected to operate. Rise Gold has not published a feasibility study for the Idaho-Maryland mine. The goal of a feasibility study is to demonstrate the project is economically viable if it is designed, constructed and operated in accordance with the concepts set forth in the study. The feasibility study will define the Ore Reserves, the mining methods, the mineral processing concepts, and the scale of the project. To my knowledge, Rise Gold has commented on the mining methods, mineral processing concepts, and some aspects of the scale (1,000 tons/day). Every other gold miner I covered performed a feasibility study in order to convince investors the investment in a new project was a good one. The process can take up to 7 years. The fact Rise Gold has not performed a feasibility study is concerning not only for potential investors but also the community does not know if the mine can operate profitably. If Rise is promising 300 jobs once the mine is fully operational, we do not know the time frame of the mine opening, the time to full production, nor do we know how long the mine can operate. Every gold miner publishes in its 10-K and Annual Report its Reserves and Resources. Those numbers provide the mine life to investors (the calculation is simply Reserves/Annual Production). The fact Idaho-Maryland operated from 1866-1955 would suggest the Reserves and/or the Resources might be minimal. This should be disclosed to everybody. Here, I note that the Reserves and Resources change every year with the price of gold. Some gold reserves at different mines are more costly to extract than others; therefore, a gold miner has to annually adjust its Reserves and Resources. Aside from the lack of AISC, the lack of Reserves, and the lack of a total project cost, which makes Rise Gold a poor investment, Rise Gold has a complete lack of capital for a full scale mine. Rise Gold stated it would pay 300 people an average of $90,000/year during full production. Those would be nice jobs to have in Nevada County, but how can Rise Gold pay those people $27 million/year when its market capitalization is $15.8 million? Rise's most recent equity financing totaled $2.4 million. I do not know what that Use of Proceeds are, but this financing as well as recent other investments in Rise Gold amount to kicking the can down the road. Due to Rise Gold's poor capital position, I would question the Company as a going concern and its ability to fund the operations. On the ESG front, I do not see how one could invest in Rise Gold. On an environmental basis, it is impossible for the environment to benefit with a gold mine operating in the populated area. There are too many operational risks that could occur even for an experienced miner, let alone the CEO of Rise Gold. Local high paying jobs is the only social benefit. On governance, the CEO appears to be untrustworthy based on his previous experiences with trying to mine gold in other parts of North America. The CEO is the only employee of the Company according to Rise Gold's 10-K, so he has no checks and balances. He has little expertise on operating a mine which does not bode well for the likely failure of mining operations in an area where catastrophe could occur and create unwanted or unexpected fallout. In sum, Rise's inability to produce basic gold mining fundamental operating costs, reserves, and project cost forecasts should limit its ability to produce from Idaho-Maryland forever. If history is any guide, gold prices will remain volatile, and Rise Gold will over promise and under deliver. It would be a disgrace to allow Rise Gold the opportunity to mine anything from Nevada Country over 5 years, let alone 80 years. Sincerely, Mike Frey Idaho.mmeir@co.nevada.ca.us

INDIVIDUAL LETTER 88: CAROLINE COURTRIGHT

Response to Comment Ind 88-1

The comment is an introductory remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 88-2

The commenter's concerns are in regards to the Project Applicant's financial wherewithal to complete the proposed project, which is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Individual Letter 89

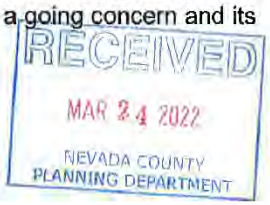
Submitted by Caroline Courtright, resident of Grass Valley 21 years, small business owner, and NID agricultural customer. (DISTRICT 4.) 12025 LARKSPUR LN, GRASS VALLEY 95945

I am appalled by the fact that there is so little financial information available from Rise Gold. Other investable gold miners utilize a metric called "All-In Sustaining Costs" (AISC) to describe the cost to produce one ounce of gold. AISC's line items include cost of sales excluding depreciation and amortization, royalties, and production taxes but includes treatment and refinement charges. In addition, AISC's additional costs include sustaining capital expenditures, leases, general and administrative costs, and minesite exploration and evaluation costs. This information is pertinent because that metric would inform Grass Valley and Nevada City citizens and the potential employees of Rise Gold when the mine can be expected to operate. If gold prices fall below $1500/ounce range the company will stop mining gold because it would be losing money.

Ind 89-1

Rise Gold has not published a feasibility study for the Idaho-Maryland mine. The goal of a feasibility study is to demonstrate the project is economically viable if it is designed, constructed and operated in accordance with the concepts set forth in the study. The feasibility study will define the Ore Reserves, the mining methods, the mineral processing concepts, and the scale of the project. To my knowledge, Rise Gold has commented on the mining methods, mineral processing concepts, and some aspects of the scale (1,000 tons/day). Most other gold mines performed a feasibility study in order to convince investors the investment in a new project was a good one. The process can take up to 7 years. The fact Rise Gold has not performed a feasibility study is concerning not only for potential investors but also the community does not know if the mine can operate profitably. If Rise is promising 300 jobs once the mine is fully operational, we do not know the time frame of the mine opening, the time to full production, nor do we know how long the mine can operate. All gold miners publish in its 10-K and Annual Report its Reserves and Resources. Those numbers provide the mine life to investors (the calculation is simply Reserves/Annual Production). The fact Idaho-Maryland operated from 1866-1955 would suggest the Reserves and/or the Resources might be minimal. This should be disclosed to everybody. Here, I note that the Reserves and Resources change every year with the price of gold. Some gold reserves at different mines are more costly to extract than others; therefore, a gold miner has to annually adjust its Reserves and Resources.

Aside from the lack of AISC, the lack of Reserves, and the lack of a total project cost, which makes Rise Gold a poor investment, Rise Gold has a complete lack of capital for a full scale mine. Rise Gold stated it would pay 300 people an average of $90,000/year during full production. How can Rise Gold pay those people $27 million/year when its market capitalization is $15.8 million? Rise's most recent equity financing totaled $2.4 million. I do not know what that Use of Proceeds are, but this financing as well as recent other investments in Rise Gold amount to kicking the can down the road. Due to Rise Gold's poor capital position, I would question the Company as a going concern and its ability to fund the operations.



On the ESG front, I do not see how one could invest in Rise Gold. On an environmental basis, it is impossible for the environment to benefit with a gold mine operating in the populated area. There are too many operational risks that could occur even for an experienced miner, let alone the CEO of Rise Gold. Local high paying jobs is the only social benefit. On governance, the CEO appears to be untrustworthy based on his previous experiences with trying to mine gold in other parts of North America. The CEO is the only employee of the Company according to Rise Gold's 10-K, so he has no checks and balances. He has little expertise on operating a mine which does not bode well for the likely failure of mining operations in an area where catastrophe could occur and create unwanted or unexpected fallout.

In sum, Rise's inability to produce basic gold mining fundamental operating costs, reserves, and project cost forecasts should limit its ability to produce from Idaho-Maryland forever. If history is any guide, gold prices will remain volatile, and Rise Gold will over promise and under deliver. It would be a disgrace to allow Rise Gold the opportunity to mine anything from Nevada Country over 5 years, let alone 80 years. \

Ind 89-2

This may sound like it addresses only the financial aspects of the Rise Gold project, yet realize the above information deeply portrays the environmental damage such a project poses to our community. It would be awful for Rise Gold to start the project, dewater and make a mess, then file for bankruptcy and leave. They would leave devastated environmental damages and also will likely not have the money to clean-up the Superfund site. This is the most likely scenario for a company that is only a 18 million cap company.

This shows that the DEIR is incomplete. Accountability for cleaning-up the Superfund site is missing.

Ind 89-3

Also the DEIR is incomplete because there is no feasibility study.

Ind 89-4

Also the DEIR is incomplete because an 80 year permit is unreasonable and avoids accountability. NID even said 40 years involved too much guess work to be a reliable risk assessment study.

Ind 89-5

Say NO, it is the only way to go. An industrial gold mine with its potential for polluting toxins and drying up or contaminating local wells has no right in our residential community.

Also the EIR is incomplete because it does not show how this industry will ruin our local tourist industry with it pollution and destruction of natural creek habitat of Wolf Creek and even the Yuba River.

Caroline Courtright
ccdunrite@gmail.com

INDIVIDUAL LETTER 89: CAROLINE COURTRIGHT

Response to Comment Ind 89-1
The commenter's concerns are in regards to the Project Applicant's financial wherewithal to complete the proposed project, which is outside of the scope of CEQA. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 3 regarding operator responsibility.

Response to Comment Ind 89-2
Please see Master Responses 3 and 4.

Response to Comment Ind 89-3
Please see Response to Comment Ind 89-1.

Response to Comment Ind 89-4
The comment expresses a general opinion that the 80-year permit is unreasonable and avoids accountability, but does not provide specific examples that would allow for a detailed response. For further information regarding operator responsibility see Master Response 3.

Response to Comment Ind 89-5
Please see Master Responses 1 and 2.

Individual Letter 90

From: Steve and Carolyn Battaini
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project opposed to the proposed reopening
Date: Saturday, February 12, 2022 7:17:16 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Kelly,

Ind 90-1 Our family is totally opposed to the proposed reopening of the IM mine. **In today's world, water is the new gold. Gold is for investors, and water is for life. No water, no life. Period. There are so many significant impacts for the State of California & CEQA environmental areas, that there is no valid reason to continue on with this proposal.** Stop it now.

Ind 90-2 If the Use Permit were approved, it is critical that any and all damages and costs associated with impacts of the mining operations are completely born by the mine operators and not the property owners and residents of the community. This is made difficult because of the long duration of the proposed project and the many unknowns. There is probably not enough money to cover the damages and costs, ever by any entity ..... Rise Gold certainly doesn't have these deep pockets. The County doesn't have deep enough pockets. I don't think the State has deep enough pockets either.

Ind 90-3 **We are on a well,** close by the site. The potential dewatering impacts on the region include, but are not limited to, reduction in well water levels, reduction in well yield, degradation of water quality, well failure, impacts to land values, habitat, and personal property.

Ind 90-4 There are numerous domestic wells directly over the mineral rights area, but the de-watering impacts on the groundwater and wells may extend well beyond the boundaries of the mineral rights.
Providing safeguards for well owners in the area of the proposed mine is challenging and requires careful and detailed consideration. I think you'll find that it's too much risk, too many unknowns, and vast devastation that cannot be corrected in centuries of cleanup. The points considered identified many but certainly not all of the issues, as some are not yet anticipated.

Ind 90-5 **In addition, with our wildfire risk (now all year long) and climate change reducing our water hydration, who can say we have enough water to just pump it out of the ground, and dewater our county aquafirs?** I don't think we can afford this devastation to our county.

Ind 90-6 **There are SOOOO many significant impacts, on so many levels, that this is JUST WRONG to continue consideration of this Maybe it would have been OK 100 years ago, but NOT NOW in this day and age.**

Respectfully yours,
Carolyn & Steve Battaini
14027 Liquidambar Ln
Grass Valley, CA 95945

INDIVIDUAL LETTER 90: CAROLYN AND STEVE BATTAINI

Response to Comment Ind 90-1
Please see Master Response 1.

Response to Comment Ind 90-2
Please see Master Responses 1 and 3.

Response to Comment Ind 90-3
Please see Master Response 1. Please also see Chapter 4.8, Hydrology and Water Quality, of the DEIR in regard to potential dewatering impacts.

Response to Comment Ind 90-4
Please see Master Response 15.

Response to Comment Ind 90-5
Please see Master Response 16.

Response to Comment Ind 90-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. Please see Master Response 1.

Individual Letter 91

From: Steve and Carolyn Battaini <crosjb@sbcglobal.net>
Sent: Friday, February 11, 2022 3:24 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine Project opposed to the proposed reopening

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Kelly,

Ind 91-1 Our family is totally opposed to the proposed reopening of the IM mine. **In today's world, water is the new gold. Gold is for investors, and water is for life. No water, no life. Period. There are so many significant impacts for the State of California & CEQA environmental areas, that there is no valid reason to continue on with this proposal.** Stop it now.

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Ind 91-3 **We are on a well,** close by the site. The potential dewatering impacts on the region include, but are not limited to, reduction in well water levels, reduction in well yield, degradation of water quality, well failure, impacts to land values, habitat, and personal property.

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Ind 91-5 **In addition, with our wildfire risk (now all year long) and climate change reducing our water hydration, who can say we have enough water to just pump it out of the ground, and dewater our county aquafirs?** I don't think we can afford this devastation to our county.

Ind 91-6 **There are SOOOO many significant impacts, on so many levels, that this is JUST WRONG to continue consideration of this Maybe it would have been OK 100 years ago, but NOT NOW in this day and age.**

Respectfully yours,
Carolyn & Steve Battaini
14027 Liquidambar Ln
Grass Valley, CA 95945

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INDIVIDUAL LETTER 91: CAROLYN AND STEVE BATTAINI

Response to Comment Ind 91-1
Please see Master Response 1.

Response to Comment Ind 91-2
Please see Master Responses 1 and 3.

Response to Comment Ind 91-3
Please see Master Response 1. Please also see Chapter 4.8, Hydrology and Water Quality, of the DEIR in regard to potential dewatering impacts.

Response to Comment Ind 91-4
Please see Master Response 15.

Response to Comment Ind 91-5
Please see Master Response 16.

Response to Comment Ind 91-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. Please see Master Response 1.

Individual Letter 92

Steve and Carolyn Battaini
14027 Liquidambar Ln.
Grass Valley, CA 95945



April 2, 2022

Board of Supervisors
County of Nevada County
950 Maidu Ave,
Nevada City, CA. 95959

Dear Sirs,

92-1

We oppose the Idaho Maryland Mine because it's a short-sighted, profit driven project with long-term consequences for this community, for local flora and fauna, the air, the water, and our quality of life. We also know well the harmful impacts of mining.

Water is the new gold. It's the lifeblood of every living creature. This project will pump it out of our county, into the watershed with the potential of heavy metal pollution to all downstream users.

We are living in a time of climate crisis and ecological emergencies. The idea itself is absurd, let alone the consequences it will have many generations into the future.

This unconscious greed for gold requires no regard to the unforgiving impacts it leaves in the wake of the destructive operations to get it out of the ground, literally, under our homes. In a nutshell, mining devastates communities, water and the environment, and should never be considered an option where people live nearby or downstream.

Please consider the horrible consequences of this ill advised project to the area, California, United States and the world.

Thank you for your consideration.

Sincerely,

Carolyn Battaini

Carolyn & Steve Battaini

Please fill out and return the attached postcard today!

Detach the support card on the right and fill out the reverse side.

We'll use these cards later to show the Board of Supervisors the strong support throughout the community for re-opening the Idaho-Maryland Mine.

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

RECEIVED
APR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

92-2

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO! NO! NO!

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____



Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team?

Please visit RiseGrassValley.com and sign up.

INDIVIDUAL LETTER 92: CAROLYN AND STEVE BATTAINI

Response to Comment Ind 92-1
Please see Master Response 1.

Response to Comment Ind 92-2
Please see Master Response 1.

Individual Letter 93

From: Carrie Finlay <vajra418@gmail.com>
Sent: Monday, April 4, 2022 1:00 PM
To: Idaho MMEIR
Subject: Fwd: NO to the Idaho_Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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NO to Rise Gold and NO to the Idaho-Maryland Mine.
We must commit to slowing climate change NOT contributing to it and this mine would have extreme, devastating environmental impact:

"Rise Gold proposes to generate significant amounts of carbon and greenhouse gasses every year. If you take their estimates at face value, they would create over 3,500 metric tons of CO2 during construction, and over 9,000 metric tons during operations. These emissions would be new to our community, and they would undermine state of California climate goals." -David J Whitehead

David J Whitehead explains in more detail here

Ind 93-1

NO to wasting billions of gallons of water.
NO to polluting the atmosphere.
Rise Gold is acting out of selfish gain and meaningless speculated profit. This will not achieve what you want, it will only make everything worse. You wont have a planet to inhabit if your payday comes.

Please support our environment and communities and STOP this mine.
Thank you,

--
Carrie

--
Carrie

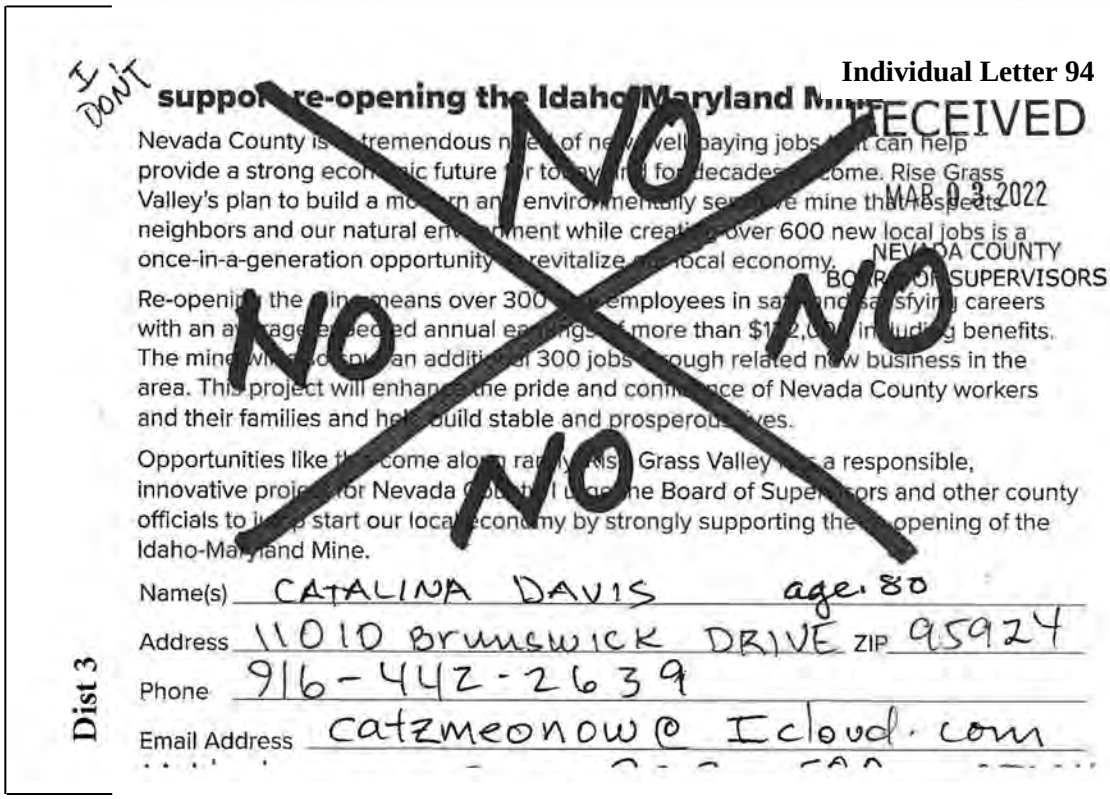
1

INDIVIDUAL LETTER 93: CARRIE FINLAY

Response to Comment Ind 93-1

Please see Master Response 1.

Individual Letter 94



I DON'T support re-opening the Idaho-Maryland Mine

NO NO NO NO

RECEIVED
MAR 03 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new well paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize the local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $1[illegible]2,000 including benefits. The mine will support an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to help start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CATALINA DAVIS age: 80

Address 11010 BRUNSWICK DRIVE ZIP 95924

Phone 916-442-2639

Email Address catzmeonow@Icloud.com

Dist 3

Ind 94-1

INDIVIDUAL LETTER 94: CATALINA DAVIS

Response to Comment Ind 94-1

Please see Master Response 1.

Individual Letter 95

From: Cate Keller
To: bdofsupervisors
Subject: Vote No on Mine
Date: Tuesday, February 15, 2022 10:56:35 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Nevada Co Supervisors,

My husband and I moved to Nevada County 10 years ago. We are raising our family here. We have purchased several pieces of property in Nevada City and Grass Valley and own a local business. We also volunteer and donate locally.

Ind 95-1

We are active and invested in this community because we believe in it's locally minded, forward thinking citizens and culture. If Nevada County wants to continue to grow it's economy, let's not do it in a way that compromises our attraction to the higher end earners and white collar investors looking to relocate here. Let's not resort to the same plan as the poverty stricken rural areas of Alaska, West Virginia, and Kentucky. If we decide to begin mining again it isn't moving forward, it's moving backwards.

And our family will become very doubtful of our investments here.

Thank you for your time,
Cate Keller

INDIVIDUAL LETTER 95: CATE KELLER

Response to Comment Ind 95-1

Please see Master Responses 1 and 2.

Individual Letter 96

From: Catherine Flowers <flowerscatherine57@gmail.com>
Sent: Monday, April 4, 2022 1:55 PM
To: Idaho MMEIR
Subject: Draft Environmental Impact Report for the Idaho-Maryland Mine Project - Comments

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Dear Mr. Kelley:

Firstly, thank you for your professionalism and attention to such a complex and tedious project.

In principle, I strongly object to this project being considered simply because there was a similar land use operation more than half a century ago.
As a property owner and resident living literally on top of and close to the Empire Mine, I can only imagine what it would be like to have that mine or any mine for that matter activated for mining purposes. Environmentally and economically, it does not make sense, as the benefits to the county and city residents of Nevada County are minimal, and the impacts, very long-term significant.

Ind 96-1

My specific concerns are related to the following areas:

Air Quality
Transportation and Traffic
Hazards and Hazardous Materials
Noise and Vibration
Hydrology/Water Quality
Water Supply Analysis
Economics

All of these areas overlap one another and in particular Transportation and Traffic, Hazards and Hazardous Materials .
With regard to the transport of explosives, hazardous materials, contaminated soils, and accident conditions and the transport
of these materials everyday, over a 16-hour period (6:00 AM to 10 PM) for years using using local feeder roads to State Highway 49 and 20,
has there been or will there be a "worst case scenario" analysis of what happens should a road accident incident occur causing a spill of hazardous waste?
How will 100 trips per day impact safety for those making their way to work everyday?

Ind 96-2

Please make my email to you as part of the public comment period for this Draft Environmental Document.

Sincerely,

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Catherine Criss Flowers
437 Kate Hayes Street
Grass Valley, CA 95945
(510) 701-1589

?

INDIVIDUAL LETTER 96: CATHERINE FLOWERS

Response to Comment Ind 96-1

Please see Master Response 1. With regard to specific concerns related to hazards and hazardous materials, please see Chapter 4.7 of the DEIR. With regard to concerns related to the water supply analysis please see Master Response 14. Concerns related to economic impacts are addressed in Master Response 2.

Response to Comment Ind 96-2

Impact 4.7-1 of the Hazards and Hazardous Materials chapter of the DEIR analyzed whether the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As discussed therein, the proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically related to construction activities, explosives, and use and storage of various chemicals. As such, Mitigation Measures 4.7-1(a) through 4.7-1(d) were included to ensure that the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site would be reduced to a less-than-significant level.

Impacts related to increased trips on local roadways as a result of the proposed project were discussed in Chapter 4.12, Transportation, of the DEIR.

Individual Letter 97

April 3, 2022

T
o: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
Email: matt.kelley@co.nevada.ca.us

DEIR Comment Email: idaho.mmeir@co.nevada.ca.us
Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

To All Concerned:

Ind 97-1 As a homeowner and resident of Nevada County for over 35 years I appreciate the opportunity to provide public comment on the Draft Environmental Impact Report (DEIR) released by Nevada County for public review on January 4, 2022, addressing the environmental impacts of re-opening and operating the Mine for the next 80 years. My family has long roots in the mining history of this area, but I feel the negative effects of the proposed Idaho-Maryland on the important values that this community holds dear are far too costly.

I am concerned about the long-lasting environmental impacts that the Mine Project would cause and the inadequacy of the environmental analysis of the DEIR. A number of key points for me are provided here. There are MANY in the DEIR.

Ind 97-2 I am concerned about water quality in the area. The drill core testing for water quality impacts is inadequate. There was an insufficient quantity of drill core. rock analyzed to determine the mine's true impact on water quality. Only 0.68% of the rock core that was drilled were submitted for analysis and minimal information is available. The DEIR refers to a "separate report" but there is no report available. Additionally, the samples did not have a proper chain of custodies (COC) processes. It is impossible to determine the accuracy of the samples and thus the accuracy of the analysis based on the samples. This needs investigation.

Ind 97-3 I am concerned about air quality. Air quality is an issue we already struggle with in the county. The DEIR provides no evidence that the project's long-term NOx, ROG, and PM10 emissions will be mitigated to a less-than-significant level. The DEIR fails to adequately mitigate the Project's air quality impacts. It relies on a bare minimum of mitigation measures recommended by the Northern Sierra Air Quality Management District (NSAQMD) to address air quality impacts, and these measures only address emissions during a one year period of construction. The mitigation measures do not address the long-term emissions that will result from 80-years of mining operations associated with the Project. As a result, there is no evidence that the Project's

long term emissions have been mitigated to a less-than-significant level, as concluded by Baseline Engineering Consultants (Baseline).

Ind 97-4

I am concerned about groundwater. The proposed Project would significantly affect local groundwater resources by dewatering the mine, lowering groundwater levels. The dewatered groundwater resources would be converted to surface water that is discharged into existing creek channels and quickly conveyed out of the area. An incorrect assumption was made in the groundwater model used to predict dewatering impacts, which led the DEIR to significantly underestimate groundwater drawdown, both in magnitude and areal extent. The revised DEIR must rely on a corrected groundwater model in order to accurately predict. the extent of the well drawdown caused by the predicted 80 years of mine-dewatering and dewatered maintenance.

Thank you again for this opportunity to comment. I am opposed to the reopening of the mine.

Catherine Hardy
15232 Honeycomb Ranch Rd
Nevada City, CA

INDIVIDUAL LETTER 97: CATHERINE HARDY

Response to Comment Ind 97-1

This comment is introductory in nature and the commenter is concerned about potential long-term impacts of the project. Please see Master Response 1. Responses to the commenter's specific comments on the inadequacy of the DEIR are provided below.

Response to Comment Ind 97-2

The commenter states that drill core testing for water quality impacts is inadequate, that the samples did not have a proper chain of custodies process, and that sampling accuracy could be inadequate. The commenter is referred to Master Response 8 - Mine Waste Characterization. The commenter states that the DEIR refers to a "'separate report' but there is no report available" but provides no specifics on what report or where the DEIR refers to this separate report. Therefor no response is possible nor provided.

Response to Comment Ind 97-3

The commenter states the DEIR provides no evidence that emissions of NOx, ROG, and PM10 emissions will be mitigated to a less than significant level because mitigation is only required during construction. The commenter is referred to Master Response 19 - NSAQMD Criteria Pollution Thresholds during Operations.

Response to Comment Ind 97-4

The commenter states that an incorrect assumption was made in the groundwater model but provides no details or evidence on which assumption is incorrect. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendices K.2 and K.3 of the DEIR. Please also see Master Response 14 – Adequacy of Groundwater Model. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 98

From: Catherine Stifter
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Comments on the DEIR for the re-opening of the the Idaho Maryland Mine
Date: Saturday, February 12, 2022 7:17:16 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Kelley,

Ind 98-1

As the Nevada County Planning Commission reviews the Draft Environmental Impact Report for the proposed re-opening of the Idaho Maryland Mine, I request that you keep in mind the "rich" historical record of gold mining in Nevada County from the 1840s through the 1950s and into the present day. Based on what we already know to be unavoidable environmental and cultural impacts due to the ordinary and expected operations of a gold mine, I believe the DEIR has correctly identified Alternative 1, the No Build, No Project plan as the way to not move forward to re-open the mine.

Ind 98-2

As a 34-year resident of Nevada County, who lived for decades within just a few miles of Malakoff Diggins hydraulic mine site and was involved in opposing the San Juan Ridge Mine, I know and continually experience the impacts to the lands and waters where I live, work and play. As a volunteer naturalist guide for SYRCL's educational Salmon Expeditions conducted each Autumn for school age children from Nevada, Yuba and Sutter Counties, I teach about ongoing water quality impacts from legacy mining that have reduced the fall runs of Chinook salmon to all-time lows. I am also a contributing member of the Ancestral Homelands Reciprocity Project of the Nevada City Rancheria Nisenan Tribe. The Rise Gold property and proposed mine exist within the Nisenan traditional and ancestral homelands.

One year ago, I moved to the Union Hill area of Grass Valley, adjacent to the Empire Mine State Park, throughout which evidence of mining impacts is abundantly clear. My home is .9 mile from the Brunswick Industrial site. I will comment on just two of the issues that about which I am most concerned and have educated myself by reading the DEIR.

Ind 98-3

I am concerned about the significant impacts to Native Tribes whose traditional and ancestral homelands contain the proposed mine sites, primarily the Nevada City Rancheria Nisenan Tribe. Impacts described in Sections 4.5-2 through 4 on Table 2-1 of the Executive Summary (pages 2-61-63 of the DEIR) refer to "substantial adverse change in the significance of an archeological resource, tribal cultural resources or disturbance of any human remains." The mitigation measures call for consultation ONLY IF and WHEN construction or mining activities uncover resources or remains. Consultations with cultural resources experts in coordination with the Nevada County Planning Department should also be become part of this mitigation strategy PRIOR TO the commencement of any project activities on any of the construction sites to prevent destruction of cultural materials and sites.

Ind 98-4

I am also concerned about significant impacts to surface and ground water quality described in Section 4.8-1. As a paddler, swimmer and hiker who lives and recreates in the Bear River watershed and as a resident whose home and water system are within one mile of the mine, my concern is that the water treatment plant design and operations described in the mitigation

measures, as well as the required quarterly monitoring reports would not be able to prevent pollution and contamination of the mine property, Wolf Creek and subsequently all other waterways downstream, beginning with the Bear River. Both Wolf Creek and the Bear River are still in the process of returning to fully functioning ecosystems after suffering heavy impacts of historic gold mining. The risk of hazardous constituents in waste water discharged into Wolf Creek is too great. The solution to this concern is the adoption of Alternative 1, No Project (No Build) alternative whether or not it meets any of the project objectives.

Ind 98-5

As a private citizen, I have just spent 4.5 hours reviewing the DEIR and responding in this letter. I'm neither a scientist nor a contractor, but I do understand that elements of this DEIR are flawed and need to be addressed by the Planning Committee.

Sincerely,

Catherine Stifter (she/her)
10371 Mercury Drive
Grass Valley, CA 95945
530-277-6310
cstifter2@gmail.com

INDIVIDUAL LETTER 98: CATHERINE STIFTER

Response to Comment Ind 98-1

Please refer to Master Response 1. The DEIR determined that the No Project (No Build) Alternative would be the environmentally superior alternative. As noted on page 6-42 of the DEIR, "Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the County."

Response to Comment Ind 98-2

The comment is a general description of the commenter's credentials, and does not address the adequacy of the DEIR.

Response to Comment Ind 98-3

As described in the Method of Analysis section of Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR (see page 4.5-19), reparation of the Historic Properties Inventory and Finding of Effect prepared for the proposed project included a cultural records search, literature review, consultation with the Nevada County Landmark Commission (NCLC), consultation with the Native American Heritage Commission (NAHC), and a field survey. In addition, consistent with CEQA Guidelines and Assembly Bill 52, as part of the DEIR process, local tribes were notified and invited to consult on the proposed project, and such information was presented in the DEIR.

Response to Comment Ind 98-4

Impacts to surface and groundwater quality are addressed in Chapter 4.8, Hydrology and Water Quality, of the DEIR. In addition, see Master Response 35, regarding discharge into South Fork Wolf Creek.

Response to Comment Ind 98-5

The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 1.

Individual Letter 99

RECEIVED
MAR 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

424 North Pine St.
Melior Benoit
Nevada City, CA 95959

March 15, 2022

attn: Matt Kelley, Senior Planner

Thank you for the opportunity to express concerns for the Environmental impact of the proposed Idaho-Maryland Mine Project.

With all I've come to understand:

99-1 I believe this would be tragic for our community well being due to: air quality, water contamination, noise and traffic issues. Basics for Quality of Life.

Please deeply consider the "well being" of our future.

Sincerely,

Attn Melior Benoit
(530) 793-1233

INDIVIDUAL LETTER 99: CATHY BENOIT

Response to Comment Ind 99-1

Please see Master Response 1.

Individual Letter 100

From: Cathy Boyle-Dowd <nieshadog@gmail.com>
Sent: Monday, April 4, 2022 8:22 AM
To: Idaho MMEIR
Subject: Comment on DEIR

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Ind 100-1

Hello. I am a resident of Nevada County since 1978. My husband and I raised our kids here. We own a construction company here and have been successful in our profession and the raising of our kids in Nevada County. Our kids live, work and have their own children. It's a good life for all of us and that's the way I want to keep it. We don't need this mine in our county. We have been there and done that. Just look around at how mining changed the landscape in not a good way. Empire Mine with its toxic water and tailings is one example. This idea is horrible. We don't have the water it takes to make it happen. Also, as houses and neighborhoods are being built who would want a working mine next store? Not to be critical of the county, but the infrastructure is severely lacking in an emergency situation. Look at how things failed when a fire was close by and in December when the big storm hit. I don't want to risk failure when the county falls apart when the mine fails. I say NO to the mine for sake of my grandkids. It's a terrible idea. Thanks for listening.
Sincerely,
Catherine Boyle-Dowd

INDIVIDUAL LETTER 100: CATHY BOYLE-DOWD

Response to Comment Ind 100-1

Please see Master Response 1.

Individual Letter 101

Cathy Edger
15319 Chinook Lane
Grass Valley, CA 95945

Mr. Mathew Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Ave, Ste 170
Nevada City, CA 95959-1423

February 12, 2022

Dear Mr. Kelley,

Ind 101-1 I worked for many years as a Park Ranger for a water district in the Bay Area. I live in the upper Rattlesnake Road area. I first visited Grass Valley on a Gold Country history trip when I was in high school, and have been connected via family to the town since the 70's.

I was alarmed when I first heard the possibility of Rise reopening the Idaho Maryland Mine. Add my name to those who strenuously object to the reopening of the mine. My objections?

Ind 101-2 1. Water. My primary (and only) residence depends on well water for all household and landscape use. I put no credence in the claims of Rise that the aquifers upon which wells depend will not be affected by mining activities.

Ind 101-3 2. Noise. Our home is in a serenely quiet area. The quiet is something our friends comment on as we sit on our patio and visit. I have learned over the course of my life that quiet is a quality of life issue that all too many people disrespect, especially when it conflicts with their agenda. The noise generated by mining activities will affect the quality of our life and our neighbors as well.

Ind 101-4 3. Community character. The last mine in the area closed a long time ago, and Grass Valley has transitioned from a mining community to a community of small businesses, light industry, agriculture, and tourism. It is a gem of a town. To disrupt it with the grit of mining activity would be a quality of life shift in a negative direction.

Ind 101-5 4. Economy. Rise likes to promote the idea that the mine will bring jobs with them. I doubt it. In my life (in one chapter of my life I was also a landscape designer, and my dad was a general contractor) I have see all too often how people discount the skill or training required to perform what Mike Rowe calls "dirty jobs". I think the evidence will show that most of the high paying jobs will probably go to those who have already been in the mining business, not local businesses

Ind 101-6 5. Traffic. Big trucks on 174 at all hours? How does that benefit residents living in that corridor? It does not. In any way. Life experience and observation lead me to predict increased noise, congestion (which is getting worse all the time), dust, and air quality.

Let Rise Grass Valley go elsewhere to do their dirty work.

Best Regards,

Ind 101-7

Cathy Edger

Enclosure: Rise requested support response., with negative notations.

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

I DO NOT SUPPORT RISE GRASS VALLEY

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

Ind 101-8

Ind 101-9

DO NOT

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

INDIVIDUAL LETTER 101: CATHY EDGER

Response to Comment Ind 101-1
This comment is introductory in nature and the commenter opposes the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 101-2
The commenter disagrees with DEIR's finding regarding impacts to groundwater wells but does identify how the DEIR is inadequate. The DEIR analyzed impacts to groundwater wells in Chapter 4.8 of the DEIR (Hydrology and Water Quality). Please also see Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 101-3
The commenter states that the project will result in adverse noise impacts but does not identify how the DEIR is inadequate. The DEIR analyzes noise impact in Chapter 4.10 (Noise and Vibration). Regarding quality of life concerns, please see Master Responses 1 and 2.

Response to Comment Ind 101-4
The commenter states that the project will result in adverse impacts to community character but does not clarify what is meant by "community character" and does not identify any inadequacies with the DEIR. To the extent the commenter is concerned with social impacts to the community, the commenter is referred to Master Response 2 – Social and Economic Impacts. If the commenter is discussing aesthetic impacts, those impacts were analyzed in Chapter 4.1 (Aesthetics).

Response to Comment Ind 101-5
The commenter states that the DEIR overstates the project's benefits to local employment. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 101-6
The commenter states that the project will result in adverse impacts to traffic, noise, and air quality but does not discuss how the DEIR's analysis of these resource areas is inadequate. The DEIR analyzed traffic in Chapter 4.12 (Transportation), air quality impacts in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and noise impacts in Chapter 4.10 (Noise and Vibration).

Response to Comment Ind 101-7
The commenter states that the Project Applicant should go elsewhere. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 102

From: Caulen Lauria <caulenl@gmail.com>
Sent: Friday, April 1, 2022 3:04 PM
To: Idaho MMEIR
Subject: Mine CEA

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Greetings,

Let it be known and recorded that in relation to the following link and findings of the environmental impact for the proposed mine, Nevada County stands United against and rejects the project. The facts of its destructive nature are manipulated to appear benign from a greedy foreign non local careless agenda. Serious efforts will be taken to ensure no corrupt official is assisting subversion for nefarious financial gain. Please stand for the obvious facts and city protection.

Ind 102-1

Thank you.

https://download-files.wixmp.com/ugd/1ecb43_31fa1725a09f46c3a500dabb67c9a2b3.pdf?token=eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJpc3MiOiJ1cm46YXBwOmU2NjYzMGU3MTRmMDQ5MGFhZWExZjE0OWIzYjY5ZTMyIiwic3ViIjoidXJuOmFwcDplNjY2MzBlNzE0ZjA0OTBhYWVhMWYxNDliM2I2OWUzMilsImF1ZCI6WyJ1cm46c2VydmljZTpmaWxlLmRvd25sb2FkIl0sImlhdCI6MTY0ODgzNDQ2OSwiZXhwIjoxNjQ4ODcwNDc5LCJqdGkiOiJhZGQyMWFiNGQxODYiLCJvYmoiOltbeyJwYXRoIjoiL3VnZC8xZWNiNDNfMzFmYTE3MjVhMDlmNDZjM2E1MDBkYWJiNjdjOWEyYjMucGRmIn1dXSwiYXR0YWNobWVudCI6eyJmaWxlbmFtZSI6IkNFQV9JTU1fREVJUI9jb21tZW50cy5wZGYifX0.U4Jnnje3e5NUbhb4CG1SgJviuTc2PZ2RYs6mQw1NSns

Caulen Lauria

INDIVIDUAL LETTER 102: CAULEN LAURIA

Response to Comment Ind 102-1

Please see Master Response 1.

Individual Letter 103

Cecelia Royal
128 Sierra Blanca Ct.
Grass Valley, CA 95949
ceceliaroyal@gmail.com
April 1, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Idaho.MMEIR@co.nevada.ca.us



Re: DEIR Comment: Hazards and Hazardous Materials (Chapter 4.7)

Ind 103-1

I am writing to bring attention to the DEIR section on hazardous materials, specifically explosives. The second paragraph on page 4/13-21 states that the transportation, storage and use of explosives will comply with Federal and State laws, and "given that storage and use of explosives would only occur underground at the Brunswick Industrial Site, an unexpected explosive event would not be likely to exacerbate above-ground wildfire risks."

This statement does not address the matter that to be stored underground, the explosives must of course be transported by trucks from distributing centers in Sacramento* (see Table 7). Presumably, these trucks would use I-80 to connect with the winding road of Highway 174, passing though approximately 10 miles of residential area. Also not addressed is, once arrived at the mine, there is the time involved in transferring these explosive materials from truck to the storage area underground. How can anyone offer failsafe assurances that these trucks will not be involved in a road mishap of any sort during transit? The explosives being transported are powerful enough to wipe out entire areas when ignited. Risks would increase during high tension mass vehicular evacuations that occur more frequently now during threat of wildfires and power outages. The results of such an accident would be devastating, as noted in *The New York Times* in January of this year when a truck transporting explosives to a town near Ghana, Africa, collided with a motorcycle, wiping out the town. See the following link: https://www.nytimes.com/2022/01/20/world/africa/ghana-explosion-mining-truck.html.

The risk involved in the transport of deadly explosives should be enough to give pause. The other obvious disturbing corollary to this scenario is the actual use of these explosives and the impact on this bucolic area of Nevada County.

Please veto this project. Its existence would threaten not only lives but the peace we now take for granted.

Sincerely,

Cecelia Royal

1

Table 7. Operations On-Road Vehicle Trip Assumptions

Project Vehicle	Trip Length (miles)	Maximum Daily Trips (trips/day)	Maximum Daily VMT (VMT/day)	Annual Trips (trips/year)	Annual VMT (VMT/year)
Year 2022 to Year 2026 – Engineered Fill to Centennial Site					
Engineered Fill Haul Trucks	1.8	200	360	36,500	65,700
Freight Trucks	60	6	360	312	18,720
Concentrate Trucks	145	10	1,450	728	105,560
Fuel Trucks	3.5	6	21	108	378
Cement Trucks	60	4	240	936	56,160
Explosives Trucks	60	2	120	104	6,240
Outside Services (light vehicles)	5	8	40	2,184	10,920
Employees	14.7	356	5,233	120,788	1,775,584
Year 2027 to Year 2032 – Engineered Fill to Brunswick Site					
Engineered Fill Haul Trucks	0.25	200	50	36,500	9,125
Freight Trucks	60	6	360	312	18,720
Concentrate Trucks	145	10	1,450	728	105,560
Fuel Trucks	3.5	6	21	108	378
Cement Trucks	60	4	240	936	56,160
Explosives Trucks	60	2	120	104	6,240
Outside Services (light vehicles)	5	8	40	2,184	10,920
Employees	14.7	356	5,233	120,788	1,775,584
Year 2033 to Year 2102 – Engineered Fill to Other Customers					
Engineered Fill Haul Trucks	15.5	200	3,100	36,500	565,750
Freight Trucks	60	6	360	312	18,720
Concentrate Trucks	145	10	1,450	728	105,560
Fuel Trucks	3.5	6	21	108	378
Cement Trucks	60	4	240	936	56,160
Explosives Trucks	60	2	120	104	6,240
Outside Services (light vehicles)	5	8	40	2,184	10,920
Employees	14.7	356	5,233	120,788	1,775,584

Notes: VMT = vehicle miles traveled
For 2022, a haul truck trip length of 1.8 miles was assumed based on the estimated distance from the Brunswick Industrial Site to Centennial Industrial Site.
For 2027, a haul truck trip length of 0.25 miles was assumed based on the estimated distance from the ore processing facility to the engineered fill drop-off area on the Brunswick Industrial Site.
For 2033, haul truck trip length of 15.5 miles was assumed based on the estimated distance from the Brunswick Industrial Site to various other customers.
Fuel assumed to be trucked from Robinson Fuels Cardlock a distance of approximately 3.5 miles from the Brunswick Site.
Freight, cement, and explosives trucks were assumed to have an average 60-mile distance assuming that these materials would come from distribution facilities in Sacramento California.

2

INDIVIDUAL LETTER 103: CECELIA ROYAL

Response to Comment Ind 103-1

A detailed analysis of impacts associated with explosives is included in Chapter 4.7, Hazards and Hazardous Materials. Specifically, Impact 4.7-1 addresses whether the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As discussed therein, for transportation purposes, explosives are classified by the Department of Transportation (DOT) in accordance with 49 CFR and under these regulations all explosives are listed as Hazard Class 1 materials. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a California Highway Patrol (CHP) hazardous materials transportation license and DOT hazardous materials permits. Numerous regulations are in place to ensure safety in the transport of explosives and a summary of these are provided in Table 4.7-2 of the DEIR. All companies and individuals transporting explosives to the site would be required to comply with all regulations provided in Table 4.7-2.

Individual Letter 104

From: Cecilia Reynolds <ceci@gotsky.com>
Sent: Thursday, March 31, 2022 8:52 AM
To: Idaho MMEIR
Subject: Mine Reopening

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Ind 104-1

I am firmly against the reopening of the Idaho Maryland Mine. Mining is in our past, tourism and recreation in the present.
The truck traffic alone will greatly impact our quality of life not to mention the possibility of environmental damage.
DO NOT APPROVE THIS ENDEAVOR
Most sincerely,
Cecilia Reynolds
125 Conaway Avenue
Grass Valley, CA 95945
949.677.9221 mobile
ceci@gotsky.com
"Neither a man nor a crowd nor a nation can be trusted to act humanely or to think sanely under the influence of a great fear." Bertrand Russell

1

INDIVIDUAL LETTER 104: CECILIA REYNOLDS

Response to Comment Ind 104-1

Please see Master Response 1.

Individual Letter 105

From: Chad Henderson <chad.henderson@hwy1com.com>
Sent: Wednesday, March 30, 2022 10:28 PM
To: Idaho MMEIR
Subject: Comment on the Idaho-Maryland Mine Project

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Hello,

This is a comment on the Idaho-Maryland Mine Project. I would like to focus on the aspect of the reopening of the mine and job creation. Rise Gold estimates that the mine would create 300 well-paying jobs. However, the creation of those new jobs should be balanced against what those jobs could mean to other jobs and industries in the community.

If you look at this report on Nevada County's economic and workforce opportunities, you can see that the three largest employment sectors are health care and social assistance (5,515 jobs), retail trade (3,999 jobs), and accommodation and food services (3,841 jobs):

https://ncerc.org/wp-content/uploads/2020/04/Nevada-County-Economic-and-Workforce-Opportunity-Profile-March-2020.pdf

Health care and social assistance - jobs grew 30% from 2008 to 2018.
Retail trade - jobs decline by 3.5% in the same period
Accommodation and food services - 23.7% job growth in the same period.
There are only 38 jobs in Mining, quarrying, and oil and gas extraction, a decrease of 50% since 2008.

Ind 105-1

Even if the mining jobs increased to 338 jobs, that would still be a small fraction of the total jobs. And why does this matter to the other jobs? It's because people live in Nevada County, and Grass Valley, because of the quality of life here, the sense of community, and the beautiful nature and cultural life. The daily activities of the mine - the trucking, the explosions, the potential for poorer water quality - put all of the other jobs at risk.

People visit our area for the same reason that others live here. But what if instead Grass Valley being known as a cultural, historical destination of natural beauty, it becomes known as the place with the noisy trucks, the place where the water quality is questionable, and instead of a quaint historical mining past, a place of modern mining destruction? Is it worth the risk? For 300 jobs? As the report states, there are so many other industries worthy of our investment, industries that have a future. Grass Valley's brand is a cozy community with a historic district - should that be risked for a mine that will not in any serious way move the economy forward? It's a gamble we don't need to and shouldn't take.

Best regards,

Chad Henderson
446 Glenwood Road

1

INDIVIDUAL LETTER 105: CHAD HENDERSON

Response to Comment Ind 105-1

Please see Master Responses 1 and 2.

Individual Letter 106

Dist 1

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

Ind 106-1

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a grandfather I urge you to think about what world we want for out next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Charles Benner

INDIVIDUAL LETTER 106: CHARLES BENNER

Response to Comment Ind 106-1

Please see Master Response 1.

Individual Letter 107

Nevada County Planning Commission

950 Maidu Ave. Suite 170

PO Box 599002

Nevada City, Ca. 95959



Re: Reopening of Idaho Maryland Mine

Dear Planning Commission:

Ind 107-1 I am writing to express my strong opposition to the reopening of the Idaho Maryland Mine (IMM)! As a resident of Nevada County since 1974, Past President of the Nevada County Board of Realtors, Realtor Emeritus, founding Board Member of the Nevada County United Way, founding board member and past board president of The South Yuba River Citizens League, past Assistant Superintendent of the Nevada County Juvenile Hall, past assistant Director of the Nevada County Council on Alcoholism, and past Chairperson of the Nevada County Juvenile Justice Commission I believe I have a very clear understanding of what makes Western Nevada County the desirable community it is. Reopening of IMM will cause permanent damage not only to our local environment and unique quality of life, but also have a long term negative effect on real estate values throughout Western Nevada County.

Ind 107-2 I have spent the last several weeks reviewing the Draft Environmental Impact Report completed for Rise Gold. Draft EIR there are numerous findings defined as having "SIGNIFICANT AND UNAVOIDABLE IMPACTS", See pages 1006 – 1009. The final sentence of this section referring to traffic cues reads " Thus, the EIR conservatively concludes that the impact would be significant and unavoidable. A careful reading of all impacts in this section are in fact significant and UNAVOIDABLE! As I understand the EIR rules we are supposed to just accept these unmitigable impacts?? The current Draft EIR makes reference to numerous unknown, and seriously scary, potential impacts, solutions for which will need to be developed AFTER the mine is up and running. In numerous places throughout the DEIR (pgs. 577, 543, 544, 1016 to note just a few), the report refers to potential future problems which would need to be dealt with once the project is operating. I was heartened to see that Rise proposed using "sawdust and kitty litter" when petroleum products are leaked into the Wolf Creek Watershed. In the section called "Collapse" (pg.573) it is noted that significant impacts could occur for which mitigation measures would have to be developed "prior to construction". Dewatering of the mine raises many unknowns which could only be dealt with at the time of failure. (In fact this type "solution" is referenced throughout the DEIR. Rise Gold repeatedly states that they will deal with issues as they arise, we are being asked to trust that they will. (Nowhere does Rise share with us their financial capability to remediate any of the potential problems of this project.)

Ind 107-3

Ind 107-4

Ind 107-5

Ind 107-6 Please also note that within the DEIR Rise asks for the right to amend Final Parcel Map #85-7 recorded 1/87. They do not state why they want to ammend this map. This is a subdivision map illustrates near surface workings, where a home built on one of the parcels suffered a major collapse. The map also makes reference to faults in the area. Given Rise's desire to move ahead I do not trust their motives for

requesting the map change. On page 567 of the Draft EIR it states "Therefore, a significant impact could occur with respect to being located on a geological unit of soil that is unstable, or that could become unstable as a result of the project, and potentially result I an off-site landslide, lateral spreading, subsidence, liquification or collapse...."

Last month Ben Mossman sent a letter to Realtors throughout Nevada County touting the safety and lack of risk delineated in the DEIR. Clearly that is how he sees this project. I could enumerate many additional questionable conclusions and assumptions of this DEIR – they run throughout the document.

Ind 107-7 In my humble opinion, the reopening of the Idaho Maryland mine will negatively impact, and irreparably harm the future Western Nevada County.

Thank you.

Charles Brock

PO Box 269, Nevada City, Ca. 95959 – 530.362.0490

INDIVIDUAL LETTER 107: CHARLES BROCK

Response to Comment Ind 107-1

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 107-2

The commenter states that the DEIR identifies six project impacts in Section 5.6 that are considered significant and unavoidable.

The DEIR states that, before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. (DEIR, p. 1-9.) The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis. (*Ibid.*) The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. (*Ibid.*) If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. (*Ibid*.)

Response to Comment Ind 107-3

The commenter states that numerous places in the DEIR refers to future problems which would need to be dealt with when the project is operating and refers to page 543 and 544 (related to closure of near surface workings), page 577 (submission of grading plans and closure of near surface workings), and page 1016 (hazardous materials). The referenced pages relate to mitigation measures that require subsequent governmental approvals before further actions can be taken. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (CCR Title 14 Section 15126.4)

Response to Comment Ind 107-4

The commenter asserts that it is problematic that Mitigation Measure 4.6-3(a) of the DEIR requires that grading plans be developed and reviewed by a geotechnical engineer subsequent to project approval, and implies that such plans should be finalized prior to project approval. Grading plans contain engineering-level detail and this level of detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare,* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 107-5

The commenter states that there is no guarantee that the Project Applicant will comply with mitigation requirements, specifically with regard to dewatering, but does not explain how the DEIR is inadequate. The Idaho-Maryland Mine Groundwater Monitoring Plan is designed to predict impacts to domestic water wells before they occur. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding compliance with mitigation measures and other permit requirements, please see Master Response 3 - Operator Responsibility. CEQA does not require an analysis of an applicant's financial capability; however, some governmental permits and approvals have financial assurance requirements (e.g., the Surface Mining and Reclamation

Act requires a mine operator to post a bond or other financial assurance to guarantee reclamation of site disturbance on the surface).

Response to Comment Ind 107-6

The commenter states that the DEIR identifies an amendment to a final map as one of the requested discretionary approvals for the project, but claims the DEIR does not state the reason for the request. As discussed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR, based upon the substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres Subdivision, recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85. (DEIR, p. 4.6-31.)

In addition, a management plan was prepared pursuant to the Nevada County LUDC, Section L-II 4.3.8, to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. (DEIR, p. 4.6-32.)

While the analysis, including peer review by the County's independent expert, shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department. (*Ibid.*)

Response to Comment Ind 107-7

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 108

From: Charlie Landau <charlie@charlielandau.com>
Sent: Friday, March 25, 2022 3:46 PM
To: Idaho MMEIR
Subject: Require a bond

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There are many uncertainties regarding the plan to reopen the Idaho-Maryland Mine. Rise Gold has made several claims and promises regarding both expected and unexpected impacts.

My concern is that Rise Gold is clearly undercapitalized and does not have the resources to make good on these claims and promises. If there is a problem, the people of Nevada County will be left holding the bag.

Ind 108-1

If the county wishes to move forward with the mine, these concerns can be addressed by requiring Rise Gold to put up a bond sufficient to cover the cost of monitoring compliance and mitigating any unmet promises. For example, if more wells are dewatered than planned, the bond would pay the costs of mitigating that. If Rise Gold stands by their promises, they should not object to putting up a bond. If on the other hand they are unable or unwilling to obtain a bond, then they do not have access to the capital to make good on their promises and the project should not move forward.

Sincerely,
Charles Landau
North San Juan

INDIVIDUAL LETTER 108: CHARLIE LANDAU

Response to Comment Ind 108-1

Please see Master Responses 1 and 3.

Individual Letter 109

Dist 1

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

Ind 109-1

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As an aunt I urge you to think about what world we want for out next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Charlotte Benner

INDIVIDUAL LETTER 109: CHARLOTTE BENNER

Response to Comment Ind 109-1

Please see Master Responses 1, 2, and 3.

Individual Letter 110

From: Charly Price <charlyprice@gmail.com>
Sent: Sunday, March 27, 2022 7:48 PM
To: Planning
Subject: Idaho Maryland mine comments

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Ind 110-1

Please take a listen to this YouTube. It's the complete song I tried to sing to you at the public meeting.
https://youtu.be/jdWoLIIJOjA
From Charly Price
12655 Little Deer Creek Lane
Nevada City CA 95959

Ind 110-2

As an example of how desirable Nevada County is. I worked in Placerville on the Eldorado National Forest then took a lateral transferred in 1990 to move to Nevada City and work on the Tahoe NF. I wanted to go through all the hassles of selling my home in Pollock Pines and buying a home in Nevada City for no increase in salary because the Grass Valley area is exceptional. Please keep it that way.
Thanks for all you do for our county

INDIVIDUAL LETTER 110: CHARLY PRICE

Response to Comment Ind 110-1
Please see Master Response 1.

Response to Comment Ind 110-2
The comment is in regard to the desirability of Nevada County, and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 2.

Individual Letter 111

From: Charly Price <charlyprice@gmail.com>
Sent: Thursday, March 31, 2022 8:26 AM
To: Idaho MMEIR
Subject: My comment

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Ind 111-1

https://youtu.be/jdWoLIIJOjA

It really revolves around to total effect on our human environment.

Which has not been addressed

Thanks
Charly Price
Charlyprice@gmail.com
530-575-9480
12655 Little Deer Creek Lane
Nevada City CA 95959

1

INDIVIDUAL LETTER 111: CHARLY PRICE

Response to Comment Ind 111-1

Please see Master Response 1.

Individual Letter 112

From: Charmian
To: BOS Public Comment
Subject: Proposed reopening of the Idaho-Maryland Mine
Date: Saturday, February 5, 2022 3:00:52 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings Ladies and Gentlemen,

Frankly Rice Gold's proposal is a terrible idea; a ghastly step backwards into the 19th century. Please table this issue forever.
Letters, other voices and opinions, by learned professionals, write daily to The Union on a myriad of problems arising: Mossman and Rice Gold's financial instability, history of failed enterprises, environmental contamination and debt. A truly appalling track record.

Infrastructure damage and environmental degradation: For EIGHTY YEARS (yes we won't be alive but our childens' grandchildren will be) Unthinkable dust and noise and really no beneficial trade off for Nevada County's citizens.

Ind 112-1

WATER: Truly more precious than gold. VITAL in fact. This enterprise threatens property values and water tables - Really, imagine losing your well - your only water supply.

The Draft Environmental Impact Report lists 83 severe impacts to our area. Surely enough facts to table this issue once and for all time.; We can use that above ground space for expansion and economic growth 21st century style

Please, look to the Future not backwards.

Respectfully,
Charmian Railsback
231 Depot Street,
Grass Valley
(530) 273 8365

INDIVIDUAL LETTER 112: CHARMIAN RAILSBACK

Response to Comment Ind 112-1

Please see Master Responses 1, 2, and 3.

Individual Letter 113

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $112,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Cheri M FLANIGAN

Address 10437 Cement Hill Rd ZIP 95959

Phone 530 798 3391 N.C.

Email Address cmflanigan19@gmail.com

Ind 113-1

INDIVIDUAL LETTER 113: CHERI FLANIGAN

Response to Comment Ind 113-1

Please see Master Response 1.

Individual Letter 114

From: Cheri Martin
To: BOS Public Comment
Subject: Idaho Maryland Mine
Date: Sunday, February 27, 2022 8:37:00 PM

Dist 2

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Ind 114-1

Please vote No on opening the Idaho Maryland mine.

Cheri Martin
Grass Valley, CA

INDIVIDUAL LETTER 114: CHERI MARTIN

Response to Comment Ind 114-1

Please see Master Response 1.

Individual Letter 115

From: Cheryl Balmain <balmainiacs@gmail.com>
Sent: Saturday, April 2, 2022 3:02 PM
To: Idaho MMEIR
Subject: Rise Mining project

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I **strongly object to the Rice Mining project .**

Ind 115-1 Reopening this mine makes no sense and will destroy the quality of Nevada Co. and the uniqueness of our forested, artistic small town residential environment. A gold mine on the edge of the city limit of Grass Valley!? Please, you can't be seriously considering this. Nothing good for our county comes of this at this time.

The gold mining boom here of 1849 which peaked around the end of the 19th century and was basically over by the middle of the 20th century was a different time, fundamentally a very different place, and absolutely a different culture.

Ind 115-2 On any given day we can hear the average car/truck traffic on Brunswick Road. I can't imagine what the commercial sized trucks coming our of the mine will sound like at all hours and how they will impact us. The road traffic the mine project trucks will add to the two lane roads in the Grass Valley/ Union Hill, Glenbrook Basin, Nevada City and all of Western Nevada Co. are beyond anything this resident of Nevada County considers other than insane. The mine project just simply would take this area back 100 years and return Western Nevada County to that time of dusty, dirty, noisy, congested roads, and underground mine shaft manual workers I doubt can be found in this day and age.

Ind 115-3 Today people live here to enjoy the forested beauty, the small Northern Ca. town charm, the gorgeous clean streams and rivers, and the quiet clean environment. We have promoted the arts, and tourism and that is the focus of a large percent of our town businesses. None of this is promoted by a large hard rock mine operation near the edge of the Grass Valley city limit.

I urge you to not approve moving this project forward.

Cheryl Balmain

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INDIVIDUAL LETTER 115: CHERYL BALMAIN

Response to Comment Ind 115-1
Please see Master Response 1.

Response to Comment Ind 115-2
Potential impacts associated with noise generated by traffic associated with the proposed project are addressed in Chapter 4.10, Noise and Vibration, of the DEIR. In addition, traffic congestion is addressed in Chapter 4.12, Transportation, of the DEIR.

Response to Comment Ind 115-3
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. In addition, please see Master Response 2.

Individual Letter 116

From: C B <jcborad@gmail.com>
Sent: Friday, April 1, 2022 10:09 PM
To: Idaho MMEIR
Subject: Say no to EIR draft

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Mr. Matt Kelley, Senior Planner
Nevada County Planning Department

Dear Mr. Kelley,

Ind 116-1 I am a long time resident of Nevada County, and have owned our property here since 1971.
I am very concerned about this proposal to reopen the Idaho Maryland Mine.
Rise Gold should not be impacting our community with its plan to make profits by extracting gold. This will come with a negative impact on air quality, water quality, noise levels, and future unknown dangers to our beautiful county.
Sincerely,
Cheryl Borad

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INDIVIDUAL LETTER 116: CHERYL BORAD

Response to Comment Ind 116-1

Please see Master Response 1.

Individual Letter 117



February 11, 2022

Nevada County Planning Commission
Eric Rood Administrative Center
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato, and William Greeno,

Ind 117-1 I am writing to voice my opposition to the reopening of the Idaho-Maryland Mine as proposed by the Rise Gold Corporation. I know you are receiving much input about the negative public health, environmental, and quality of life impacts from this enormous project, and I share those objections, but I am focusing today on its negative impacts on mental health, both at the individual and the community level.

I am a Licensed Clinical Social Worker with many years of clinical experience. Nevada County already has a higher rate of depression and suicide than the California average, combined with a lower percentage of mental health providers per capita, as documented in the 2019 Community Health Needs Assessment. (www.mynevadacounty.com/DocumentCenter/View/27995)

The pandemic has led to an even greater demand for mental health services, and there has been an alarming increase in overdose deaths, many involving fentanyl. County behavioral health staff and private practitioners have been operating at capacity for several years, with no end in sight.

Ind 117-2 It is clear from the number of people mobilized in opposition to the mine, as well as newspaper articles and letters, and numerous private conversations, that the prospect of the mine has already led to a great deal of anxiety in the community. Worry about property values, loss of well water, the prospect of noise and traffic impacts, and anticipated increased health problems, especially respiratory, is widespread.

Additionally, the possible reopening of the mine is yet another divisive issue in the community. At a time when our cohesiveness is challenged on many fronts, this is an issue for which there is a clear solution, and that is to deny the Rise Gold proposal.

I strongly urge you to NOT accept the DEIR.

Sincerely,

Cheryl Thomas, LCSW

Cheryl Morris, LCSW 113 Defiant Way, Grass Valley, CA 95945 (530) 273-1990

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

INDIVIDUAL LETTER 117: CHERYL MORRIS

Response to Comment Ind 117-1

Please see Master Response 1.

Response to Comment Ind 117-2

The commenter's concerns are in regards to mental health issues within Nevada County, which is outside of the scope of CEQA, and does not address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 118

Cheryl and Byron Zook
15543 Indian Springs Road
Penn Valley, CA 95946
925-788-0806

April 3, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

Via email: Idaho.MMEIR@co.nevada.ca.us

RE: Public Comment on The Draft Environmental Impact Report (DEIR)

Dear Mr. Kelley,

Ind 118-1 We write to you today to address the deeply flawed DEIR that is currently under review. While there are many causes for concern with the flawed DEIR and its potential to pave the way for the mine to reopen, I wish to point out the concerns with 24/7 operations that will change forever the peaceful community we all love.

Ind 118-2 The noise impacts on our community are distorted by the fact the operations and the underground blasting are not addressed as a whole, but instead broken out into two separate studies. We respectively request that further analysis be done that looks at the combined impacts in one study and that this new study be paid for by the County, not the proposed mine operator Ben Mossman & Rise Grass Valley, Inc.

Ind 118-3 Cheryl worked for environmental firm for many years and we are both aware that reports that are paid for by the party with an interest in moving forward with an environmentally impactful project are written to persuade unwitting parties to agree with the findings and approve projects with incomplete or biased data. The Bollard Acoustical Consultants, Inc. (BAC) Noise and Vibration Analysis is insufficient since the underground blasting impacts are not considered as a part of this study and are evaluated in a separate study by another firm, IDC-PBS (BAC Noise and Vibration Analysis Report, dated March 8, 2021 Overview, pg. 35). The impacts on our vibrant residential community and county will not be separated. The noise from both operations (BAC Noise and Vibration Analysis Report, dated March 8, 2021 Table 9, Hours of Operation pg. 39) will occur simultaneously with underground blasting. What is required is a full study that looks at all the noise and vibrations together, not broken out to satisfy a paying client's interest in "cherry picking" data for the analytical data they want.

Ind 118-4 We respectively request that the planning department not move forward with this flawed DEIR and reject the proposed project to reopen the Idaho Maryland Mine. Let's move forward not backwards, and leave gold mining in our past and create a multi-use environmental and economically favorable project for our residential community that meets the goals of the Nevada County's own Environmental Plan.

Kind regards,

Cheryl & Byron Zook

cc: Sue Hoek, Chair, Supervisor, District 4
cc: Ralph Silberstein, President of CEA Foundation

INDIVIDUAL LETTER 118: CHERYL AND BYRON ZOOK

Response to Comment Ind 118-1

This comment is introductory in nature. The comment generally alleges that the DEIR is "deeply flawed," but provides no specific evidence – Please see Master Response 1. The commenter's specific comments are discussed in the following responses to comments.

Response to Comment Ind 118-2

The commenter would like blasting and noise studies to be combined and paid for by the County. The blasting and vibration analysis is significantly different from noise and vibration and are better understood independently. The Environmental Factors of Blasting Report (Appendix M of the DEIR) analyzes transient vibrations from the use of explosives underground, while the Noise and Vibration Analysis (Appendix L of the DEIR) analyses vibrations and noise from the surface equipment. Each has the potential to affect the environment differently. Additionally, vibrations produced from these different sources are not cumulative, and therefore a combined analysis of vibrations is not necessary and risks confusing the public.

Regarding County payment for reports, to avoid burdening the public with the cost of permitting private projects, the applicant must fund the studies necessary for an EIR. California law allows the applicant to submit technical, or other data, to the County for consideration and the County must consider all information and comments received. To avoid any appearance of possibility of impropriety, both of these reports were independently peer-reviewed by the County's consultant, Saxelby Acoustics, and determined to be adequate. The EIR represents the County's independent judgment and analysis and was prepared by the County's independent consultant Raney Planning and Management. As a result, a new study is not required. (DEIR p. 1-9.)

Response to Comment Ind 118-3

The commenter objects to the noise and blasting reports being completed by separate firms and states that CEQA requires only one report covering blasting and noise together. The blasting and noise reports were independently peer-reviewed by the County's consultant, Saxelby Acoustics, and were found to be satisfactory and adequate upon certain revisions made in response to peer review comments (see page 4.10-26 of the DEIR).

Vibrations produced from blasting and surface equipment sources are not cumulative. (see response to Comment Ind 118-2 above.) These activities take place in different locations (surface vs. underground), and comprise independent potential impacts.

The commentor alleges that noise from both activities, underground blasting and surface equipment, will occur simultaneously. However, these activities also take place at different times of the day. Blasting is typically done between working shifts (7:00AM or 7:00PM) and would be completed within seconds. Surface equipment placing and compacting engineered fill operates from 7:00 AM to 3:30 PM. Other activities such as mineral processing are continuous over the entire day. A schedule of working hours for various activities is provided in Table 3-7 of the DEIR. The evaluation of impacts from blasting noise is based on the worst-case maximum noise levels at the nearest receptors due to the short duration of this noise source (see page 58 of Appendix L). Therefore, blasting noise is not cumulative to continuous noise sources from other activities taking place on the surface, which are evaluated both on maximum noise (Lmax) and average noise (Leq). The County reviewed all reports independently with its own consultants and experts and the DEIR represents the County's analysis of the analytical data. The County must certify that the Final EIR reflects its own independent judgement and analysis. (DEIR p. 1-9.)

Response to Comment Ind 118-4

This comment generally requests the DEIR not move forward and the County to reject the proposed Idaho-Maryland Mine Project. Please see Master Response 1.

Individual Letter 119

From: Chris Buzzini <buzzini.chris@gmail.com>
Sent: Monday, April 4, 2022 3:27 PM
To: Idaho MMEIR
Subject: Oppose Mine Re-opening

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I am 100% opposed to the re-opening of the Idaho-Maryland Mine by Rise Grass Valley Inc.

Ind 119-1 My family moved here in the early '70's and has seen the poorly regulated growth in Nevada County and the City of Grass Valley, Ca. Ever since. And how can the decision to reopen fall on the shoulders of the Board of Supervisors? I have knowledge that one member is moving out of the County. How unjust is that? Vote and leave? Really?

Ind 119-2 Rise Mine and any other names it is doing business under is not to be trusted. They have proven it in the past. There are still pending lawsuits. Printing expensive glossy brochures touting the benefits of the mine is not proof. In fact in 'The Science Is Clear' flyer there are two sentences that embodies RISE GRASS VALLEY INC philosophy. "The results are exactly what we've said all along. The mine will be safe, modern, well-regulated and environmentally sound." That is bullshit!

Ind 119-3 My sister lives in Cypress Hills area and I live off the freeway on Dorsey. The Freeway noise is constant and getting worse. We do not need up to a 100 huge rock trucks adding to the traffic and noise level. The traffic circle with huge rock trucks will be a disaster! The reports on environmental impact are lacking. This I proposal is not what we need or want!

I am 100% opposed to the re-opening of the Idaho-Maryland Mine by Rise Grass Valley Inc.

Chris Buzzini
Registered voter of Nevada County
503-422-8897

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INDIVIDUAL LETTER 119: CHRIS BUZZINI

Response to Comment Ind 119-1
Please see Master Response 1.

Response to Comment Ind 119-2
Please see Master Response 3.

Response to Comment Ind 119-3
Potential impacts related to traffic and noise associated with hauling trucks travelling to and from the project site are addressed in Chapter 4.12, Transportation, and Chapter 4.10, Noise and Vibration, of the DEIR, respectively.

Individual Letter 120

From: Chris Colbert
To: Idaho MMEIR
Subject: In Opposition to the Idaho Maryland Mine after DEIR
Date: Monday, April 4, 2022 8:58:37 AM

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Ind 120-1

Hello I am a Nevada County resident writing to express my opposition to the reopening of the Mine. The Environmental impact will be devastating and will surely affect everyday life for all living creatures in the vicinity. My life and quality of life will also be negatively affected at my home on Greenhorn Rd. The increased truck traffic, constant noise, and impact on our roadway infrastructure alone is enough reason to never allow such a project to happen again near a residential area. The water that must be pumped out of the existing mine shaft shall never be expelled and brought to surface to harm the invaluable wildlife and residents of this area and county. I am beyond disappointed that this project has even made it this far. We must focus on living up to our true potential here in this county and regressing back to mining is NOT progress, we can do so much better than this.

Christopher Colbert

INDIVIDUAL LETTER 120: CHRIS COLBERT

Response to Comment Ind 120-1

Please see Master Response 1.

Individual Letter 121

Chris Themelis
11022 Banner Mine Way
Nevada City, CA 95959

Mar. 23, 2022

RE: Deficiencies of Idaho-Maryland Mine Draft EIR

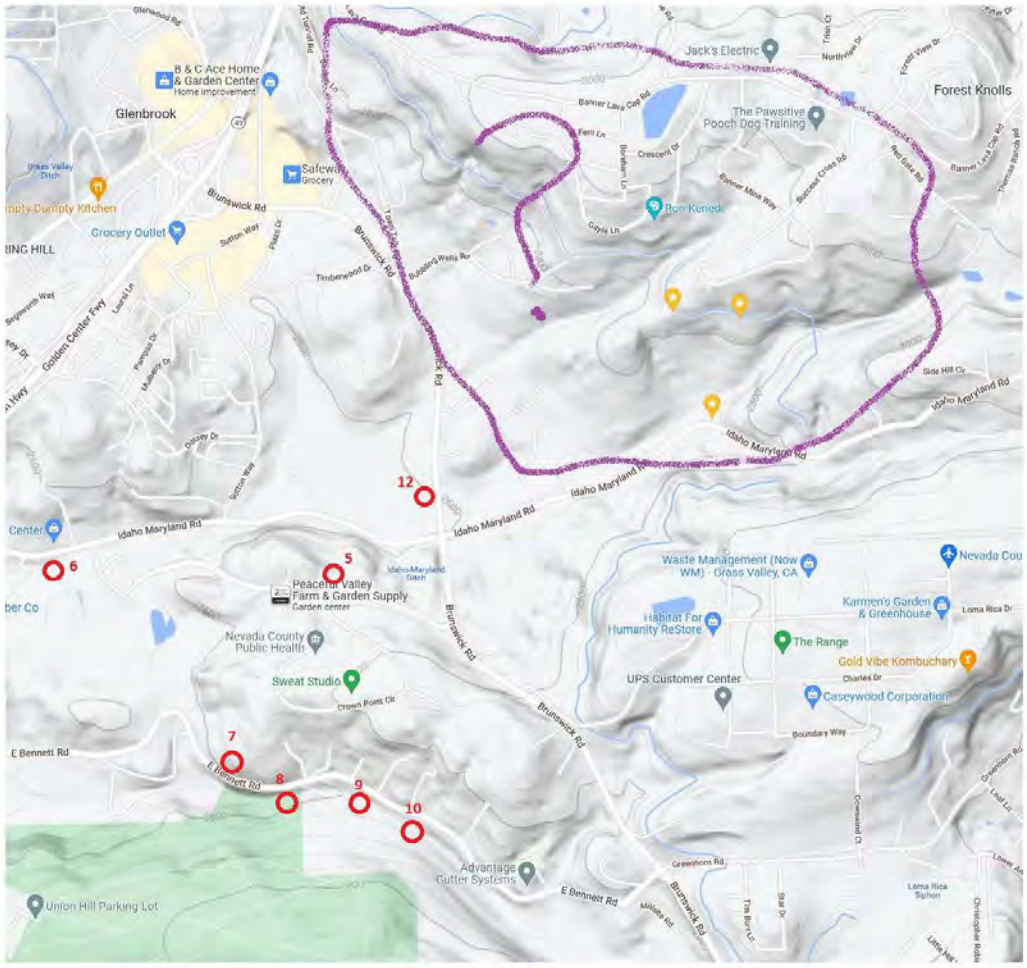
Matt Kelley
Senior Planner Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

I am a resident of lower Banner Mountain. I have previously written to you regarding my intense opposition to the re-opening of the Idaho-Maryland mine. No need to elaborate on that here, but my main concern is the impact of construction and traffic noise.

Ind 121-1

The DEIR fails to study noise impact on lower Banner Mountain, where there are many residences. Sound travels from the basin up the hill. Traffic from Brunswick Rd. between Idaho Maryland and Hwy. 49 is audible. We can hear any large truck or motorcycle that passes by. Below, I have superimposed approximate noise and vibration measurement locations, from the DEIR Fig. 4.10-3, onto a topographical map from Google. I have circled the area that will be affected and that has been neglected from the study.



Ind 121-2

Further, the DEIR uses general formulae and standards to determine whether noise impact is "significant" or not. Present the data any way you want in terms of averages and peaks, etc. in DEIR section 4.10, but adding noise from heavy trucks averaging 50 trips a day, 7 days a week, for the next 80 years will be audible and significantly impact residents' enjoyment of our properties. There is a large swath of residential area that has been left out of this study.

Sincerely,

Chris Themelis

CC: planning@co.nevada.ca.us

INDIVIDUAL LETTER 121: CHRIS THEMELIS

Response to Comment Ind 121-1

The commenter is a nearby resident and is opposed to the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is concerned about the effect of project noise on residences located on lower Banner Mountain, northeast of the project site. As shown in DEIR Table 4.10-15 and Table 4.10-16, the addition of project traffic would not result in a significant increase in noise levels at receptors along Brunswick Road, between Idaho Maryland Road and Highway 49 (i.e., the area adjacent Banner Mountain). It should be noted that this analysis assumes full production traffic levels of 200 daily truck trips rather than the average anticipated 100 truck trips (DEIR, p. 4.10-35). Given that noise is attenuated by distance and the presence of buildings, trees, and vegetation between the noise source and the noise receptor, noise levels would be reduced with greater distance from the roadway. While overall traffic on Highway 49 may be audible from residences on Banner Mountain, project traffic would represent a small portion of overall traffic and would not significantly increase noise levels.

Response to Comment Ind 121-2

Please see the above response. The comment has been forwarded to the decisionmakers.

Individual Letter 122

April 2, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Via email:Idaho.MMEIR@co.nevada.ca.us

Re:Comments regarding the Idaho-Maryland Mine Project EIR

Ind 122-1

Section 4.8 covers Hydrology and water quality. This is one of many critical areas for residents of Nevada County. In 4.8.1, the concern of water quality is addressed. The mitigation measure that is suggested is that the Central Valley Regional Water Quality Control Board monitor the water standards by receiving water samples provided to them, apparently by the mine. In addition, the mine is to provide quarterly water quality reports.

It is insufficient for our water quality to be sampled by the mine. Independent sampling and testing, occurring on recurring and random cycles should be secured by the Central Valley Regional Water Control Board. Water quality is too critical to depend on the mine to secure the tests to be analyzed. Results need to be independently obtained and tested.

Nevada County is a small, wonderful community that would be devastated if our water quality deteriorated. Please do not allow that to happen.

Sincerely,

Christie Gillison
11363 Cour Royal
Nevada City, CA 95959

INDIVIDUAL LETTER 122: CHRISTIE GILLISON

Response to Comment Ind 122-1

Please see Master Response 15.

Individual Letter 123

From: Christina Pradhan
To: Idaho MMEIR
Subject: ***NO RE-OPENING THE MINES PLEASE!!***
Date: Wednesday, March 16, 2022 8:02:37 AM

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Ind 123-1

To whom it may concern,
I am a local resident of Grass Valley, my family has been here for more than 6 generations. I live off of Empire st. and hearing that the mine might be re-opening to public is mortifying to say the least. I can't even begin to tell you how uneasy this feels. Please, PLEASE consider our HEALTH. We are all already going through enough as it is. I ask you, please for the safety and well-being of my children, family and friends, please do NOT re-open the mines. Thank you for your time. Sincerely, Christina P.

Sent from my iPhone

INDIVIDUAL LETTER 123: CHRISTINA PRADHAN

Response to Comment Ind 123-1

Please see Master Response 1.

Individual Letter 124

From: Christina Pradhan
To: Idaho MMEIR
Subject: ***NO RE-OPENING THE MINES PLEASE!!***
Date: Wednesday, March 16, 2022 8:02:37 AM

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Ind 124-1

To whom it may concern,
I am a local resident of Grass Valley, my family has been here for more than 6 generations. I live off of Empire st. and hearing that the mine might be re-opening to public is mortifying to say the least. I can't even begin to tell you how uneasy this feels. Please, PLEASE consider our HEALTH. We are all already going through enough as it is. I ask you, please for the safety and well-being of my children, family and friends, please do NOT re-open the mines. Thank you for your time. Sincerely, Christina P.

Sent from my iPhone

INDIVIDUAL LETTER 124: CHRISTINA PRADHAN

Response to Comment Ind 124-1

Please see Master Response 1.

Individual Letter 125

From: Christina Pradhan <caspradhan@gmail.com>
Sent: Saturday, March 12, 2022 1:29 AM
To: Idaho MMEIR
Subject: ***NO RE-OPENING THE MINES PLEASE!!***

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 125-1

To whom it may concern,
I am a local resident of Grass Valley, my family has been here for more than 6 generations. I live off of Empire st. and hearing that the mine might be re-opening to public is mortifying to say the least. I can't even begin to tell you how uneasy this feels. Please, PLEASE consider our HEALTH. We are all already going through enough as it is. I ask you, please for the safety and well-being of my children, family and friends, please do NOT re-open the mines.
Thank you for your time. Sincerely, Christina P.

Sent from my iPhone

INDIVIDUAL LETTER 125: CHRISTINA PRADHAN

Response to Comment Ind 125-1

Please see Master Response 1.

Individual Letter 126

April 4, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617
Sent via email to: Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

Ind 126-1 The Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR) contains several flaws that render it inadequate as it does not meet CEQA standards. As such, it should be rejected and a new Draft Environmental Impact report should be prepared and re-circulated for public comment and review. Based on my personal experience as an environmental planner I see that among other items, the DEIR: 1) fails to accurately describe the Project and 2) fails to provide sufficient credible information necessary to determine the Project's potential impacts to both groundwater and surface water quality as a result of the Project.

Failure to adequately describe the Project:

Ind 126-2 The DEIR's project description is legally inadequate because it improperly excludes the required cleanup of existing contamination on the Centennial Site from the scope of the Project. The DEIR uses the post-cleanup conditions of the Centennial site as the baseline for the impact analysis despite this not being an accurate portrayal of the existing conditions of the site. The Project proposes to create a fill pad at the Centennial Site that would cover an area of 44acres and contain 1.6 million tons of mine waste in a location that requires remediation, but does not include that remediation effort as part of the Project. CEQA Guidelines § 15125(a)(3) clearly state that "existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline." An EIR's failure to accurately determine existing baseline conditions "renders the identification of environmental impacts legally inadequate and precludes a determination that substantial evidence supports"

Failure to adequately evaluate impacts to groundwater and surface water:

Ind 126-3 The DEIR fails to adequately evaluate how the Project would affect groundwater levels or the impact to groundwater quality in the Project vicinity. Alterations to groundwater levels or groundwater quality could severely affect water availability within and near the community of Grass Valley, particularly for those in the community that rely exclusively on well water. The need to protect limited groundwater supplies and the quality of those supplies are critical, particularly as Northern California is experiences more frequent and severe drought conditions as a result of climate change that further limit the availability of surface water supplies. The Project relies on extremely limited data to model groundwater levels that does not adequately take into consideration the fluctuations that occur during different seasons and different climatic extremes that are likely to occur during the lifetime of the proposed Project. Additionally, the Project fails to provide any model to indicate the water quality impacts to

either groundwater or the surface water quality of Wolf Creek, where the Project proposes to discharge water pumped from the Project site. The additional water discharged into Wolf Creek has the potential to substantially alter the water chemistry, including the temperature and dissolved oxygen levels of the creek, which can negatively affect fish and wildlife; however, this is not adequately addressed in the DEIR. The DEIR fails to, but must, disclose the potential water quality impacts that have the potential to harm human health and the health of fish and wildlife.

Sincerely,
Christine Alford
224 Lloyd Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 126: CHRISTINE ALFORD

Response to Comment Ind 126-1

The commenter states the DEIR is inadequate. Responses to more specific comments are provided below.

Response to Comment Ind 126-2

The commenter states that the DEIR is legally inadequate because it excludes the cleanup of the Centennial Industrial Site from the scope of the project. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 126-3

The commenter states that the DEIR inadequately addresses the impact to groundwater supplies and quality, especially in the context of drought and climate change. The commenter is also concerned about potential impacts to South Fork Wolf Creek. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Fork Wolf Creek.

Individual Letter 127

Dist 2

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RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

P-3 P118 104**********ECRWSH**R015
Christopher Michael Carpenter
14406 Falling Star Ln
Grass Valley, CA 95949-6503

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

Dear NC Board of Supervisors,
I do not support this mine effort

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.



Please fill out and send back to us your support for the Idaho-Maryland Mine

I DO NOT SUPPORT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Christopher Carpenter
Address 14406 Falling Star Lane ZIP 95949
Phone 530.273.1879
Email Address

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

Ind 127-1

INDIVIDUAL LETTER 127: CHRISTOPHER CARPENTER

Response to Comment Ind 127-1

Please see Master Response 1.

Individual Letter 128

From: Chris Hall
12235 Rocker Road
Nevada City, CA 95959| chall14@sierracollege.edu

To: Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

Dear Mr. Kelley,

Ind 128 -1

I am writing you to share my concerns regarding the Draft Environmental Impact Report for the proposed reopening of the Idaho-Maryland Mine in Grass Valley. I am a local college professor and father, and I am deeply invested in the place I live—not for my own sake alone, but also for the sake of my children and their children after them. As someone who was fortunate enough to grow up in Nevada County and who has returned here to raise my own family, I find the 83 impacts identified in the report disheartening and believe that the report names several impacts that are impossible to mitigate adequately. The report as written (indeed the very project itself) appears incompatible with the natural and cultural features that grant Nevada County its unique rural, small-town character.

Ind 128-2

I attended the Nevada County Planning Commission on March 24th and know that many have already raised similar concerns to those I voice here. I can only hope that you will weigh our comments and call for further assessment of the project. To my mind, the unavoidable impacts to aesthetics, traffic, and noise point to the need for significant revisions to the DEIR at the least (and ideally adopting the "No-Build" option).

Ind 128-3

When I learned from KVMR host Martin Webb's program that the project would require an 80-year exception to County zoning and maximum heights of buildings limitations, I was alarmed. Digging into the report I confirmed the enormity of impact on the beauty of the area for myself. I have driven past the site several times, and to imagine a "64-foot-tall process plant, the proposed 165-foot-tall headframe for the Brunswick shaft, the proposed 80-foot-tall headframe for the proposed service shaft, and the proposed 50-foot-tall hoist buildings associated with the two mine shafts" (DEIR, p. 4.4-15) is to imagine a project that shatters the rural and scenic qualities of Grass Valley. On a similar note, though I know an economic impact report is not required at this time, the impacts of such major industrial construction on tourism seem well worth considering. Beyond this, as noted in the report "the overall changes to aesthetics Cumulative buildout in the geographic area would result in a change in the visual character of the region, which would be considered a significant cumulative impact. Therefore, the project's incremental contribution to the significant cumulative impact would be cumulatively considerable and significant and unavoidable." For those of us who call this place home, significant and unavoidable feel like euphemisms for disastrous in terms of impact to the natural and cultural beauty of Nevada County.

Ind 128-4

On a similar note, the impact to traffic at three key areas is significant and is reason for further review of the project. As stated on p. 4.12-61 of the DEIR, "The proposed project would increase traffic through three intersections already identified as operating unacceptably under Existing and EPAP Conditions. Thus, a significant impact to the Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive intersections would occur under the EPAP Plus Project." I acknowledge that signalization and traffic control may mitigate some of the impact to traffic identified in the report during and after the construction phase, but each of these solutions also further alters the unique quality of our home (and does not fully or adequately address the probably impact on traffic in the three key areas identified above).

Ind 128-5

Noise from the project—both from construction and operation—have been downplayed by Rise Gold from the start. Sadly, these impacts also appear to be downplayed in the DEIR, and adequate mitigations are not proposed. As the report points out, while noise generated during construction is "exempt from Nevada County LUDC noise standards," (DEIR, p. 4.10-30) it is nevertheless, "considered substantial pursuant to CEQA." Moreover, while the DEIR presents an analysis of noise during operations and claims the impact from this noise can be mitigated with a vibration monitoring program and additional mitigation measure, further analysis of these areas is necessary. As with the impact to aesthetics and traffic, for those of us who live here, "significant and unavoidable" is a gross understatement when one considers the level of noise construction and operation of the project will entail.

Ind 128-6

Ind 128-7

Ind 128-8

In addition to aesthetics, traffic, and noise, several other areas of concern arise. Critical data of accurate hydrological models is missing from current DEIR—300 wells will be affected, not to mention groundwater. Air pollution is at least one aspect not adequately addressed by DEIR. Mitigations for increase in greenhouse gas emissions from the project are unacceptable—the report fails to include cement manufacturers emissions. Moreover, the County's goals for climate mitigation will be nearly 100% undone by the mine should the project go ahead as planned. The Centennial cleanup site is not even

Ind 128-9

included in project description. A workplan is needed for this aspect of the project. The cleanup site should not be segmented from the overall project. Any one of these concerns is grounds to revisit the report and points toward the No-Build option as the only option that will preserve the unique natural and cultural character of Nevada County.

Ind 128-10

Nevada County is a place defined by its unique rural, small-town character. Significant and unavoidable impacts to noise, traffic, and aesthetics are reason enough alone to revisit the DEIR and endorse the No-Build option. Mining is part of our history, but if history has taught us anything it is that mining is not our future—a fact proven by mining's toxic legacy, a legacy toxic to both culture (evidenced by the impact on indigenous peoples and others exploited in operation of mines) and nature (as evidenced by streams and groundwater still poisoned by mining). While mining practices have changed, the DEIR reveals that this project would only mean more damage to our community in the name of gold extraction. Clearly, the reopening of the mine—not to mention 80 Years of planned operation—Involves impacts far beyond the scope of the mitigation measures outlined in the current draft EIR.

Thank you for your time,

Chris Hall

INDIVIDUAL LETTER 128: CHRISTOPHER HALL

Response to Comment Ind 128-1

This comment is introductory in nature and the commenter opposes the project. The commenter is also concerned with the project's impacts that cannot be mitigated to less than significant. Significant and unavoidable impacts from the project are summarized in Section 5.6 of the DEIR. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 128-2

The commenter states that the project's significant and unavoidable impacts should be the basis for the County not approving the project. Significant and Unavoidable impacts from the project are summarized in Section 5.6 of the DEIR. In order for the Board of Supervisors to move forward with certifying this EIR and approving the project entitlements, due to the significant and unavoidable impacts that would occur with implementation of the project, the Board would be required to adopt a Statement of Overriding Considerations. The Statement of Overriding Considerations would publicly disclose the process by which the Board weighs the environmental impacts of the project against any other factors. As enumerated in Section 15093 of the CEQA Guidelines, factors to be balanced by the Board when considering projects that would result in a significant and unavoidable environmental impact include economic, legal, social, and technological benefits of projects as well as region-wide or statewide environmental benefits. The commenter's opposition to the project is noted for decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 128-3

The commenter is concerned that the project structures required for the Brunswick site would have adverse aesthetic impacts. The commenter also states that the aesthetic impacts to tourism are worth considering. Chapter 4.1 (Aesthetics) of the DEIR also concludes that the project would result in a significant and unavoidable aesthetics impact. Regarding economic issues, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 128-4

The commenter references Chapter 4.12 (Transportation) of the DEIR and the significant traffic-related impacts the project would cause. The commenter does not state how the DEIR is inadequate. Chapter 4.12 concludes that the project's traffic impacts would be less than significant after mitigation, with the exception of traffic at the SR 174 and Brunswick Road intersection and the northbound left lane at the Brunswick Road and Sutton Way intersection, which would be significant and unavoidable due to the uncertainty of the mitigation measures identified in the DEIR. Regarding quality of life issues, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 128-5

The commenter states that further analysis of noise impacts is necessary in the DEIR but provides no specifics or evidence and does not identify how the DEIR is inadequate. Chapter 4.10 (Noise and Vibration) of the DEIR concludes that noise impacts will be less than significant after mitigation, with the exception of the installation of the East Bennett potable water line, which would be significant and unavoidable.

Response to Comment Ind 128-6

The commenter states that critical data regarding groundwater wells is missing from the DEIR but does not identify what data is missing or how the DEIR's groundwater analysis is inadequate. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 128-7

The commenter states that air pollution is not adequately addressed in the DEIR but provides no specifics or evidence. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

Response to Comment Ind 128-8

The commenter states that the DEIR omits the emissions caused by cement manufacturers. The commenter is referred to Master Response 26 - Life Cycle GHG emissions.

Response to Comment Ind 128-9

The commenter states that the Centennial Industrial Site cleanup must be included in the DEIR. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 128-10

The commenter opposes the project and states that it is incompatible with the surrounding community. The commenter's opposition to the project and support for the "No-Build option" is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 129

Christy M. Hubbard
Representative for the Wells Coalition
wells@cea-nc.org

March 24, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us

Comment Meeting (Move to Come by April 4)

RECEIVED
MAR 24 2022
NEVADA COUNTY PLANNING DEPARTMENT

Regarding: Well owners in the vicinity of the Idaho-Maryland Mine request better safeguards

Hi. My name is Christy Hubbard. I'm Grass Valley homeowner and representative for the Wells Coalition, a group of well owners in the vicinity of the mineral rights area of the Idaho-Maryland Mine.

Ind 129-1 After reviewing the DEIR, we feel the Well Mitigation Plan is not adequate. A key concern is that the County has failed to adequately define the true area of potential impact. The report repeatedly acknowledges the high level of uncertainty in hydrological models. And yet, the applicant has a mitigation plan for only 30 properties. There is no acknowledgement of risk – or plan to safeguard – domestic wells in the surrounding area.

Since public records tell us there are roughly 525 private wells within a ½ mile of the mineral rights boundary, this is a significant concern. Bear in mind that this project is asking for an 80-year use permit, and there is no reason to believe Rise Gold will constrain their mining to one small area for that entire amount of time.

Ind 129-2 Consider this scenario. One day, a homeowner turns on the tap and there's no water. It would be nearly impossible to prove that the mining operation caused damage because there is no plan to keep a reliable record of their well history. Neighborhoods would need to find immediate funding for water trucks and likely hundreds of thousands of dollars to connect to NID for a long-term solution. Based on current estimates, it would take years to restore water service. Furthermore, selling their house would not be an option because a home without water is of no value.

Ind 129-3 This is not the first time Nevada County has faced concerns about wells in the area. The last time it happened however, the County provided a much more comprehensive system of safeguards for nearby residents. In 1996, Emperor Gold was granted a Use Permit to dewater the mine for exploration which required protections for all wells in a designated "Study Area".

In addition to NID hookups for the homes on E. Bennett Road, it included: multiple years of well monitoring, a community relations program, retention of an independent groundwater consultant, pre-approval of all NID connection permits, and cash, bonds, and security to cover expenses for replacement water. All of this was done for 5 years of exploration. It did not include 80 years of mining.

Ind 129-4 On behalf of myself and well owners in the vicinity of the mine, we respectfully request that the final report provide significantly better safeguards for well owners. The potential impacts to well owners has been recognized by experts and these impacts must be addressed under CEQA. The final report must fully identify the potential area of impact and articulate a complete set of safeguards to protect this community. This County has

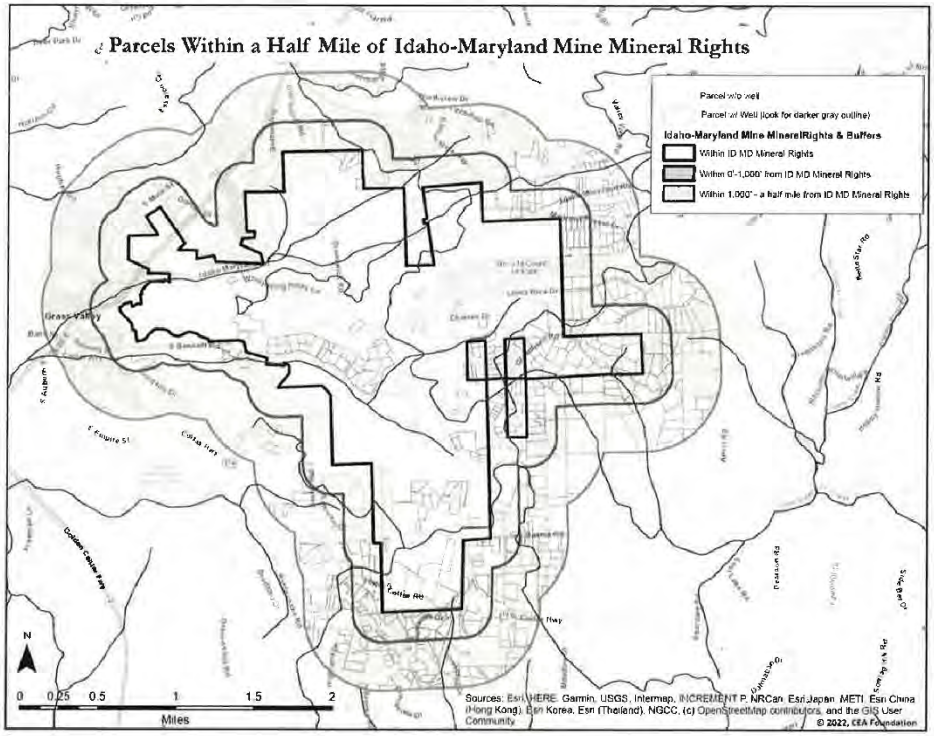
provided far better protection for us in the past. Given the enormous scope of this project, we need a more comprehensive plan to protect us in the future.

Thank you for your time.

Christy M. Hubbard for the Wells Coalition
12966 Mink Court
Grass Valley, CA 95945
wells@cea-nc.org

Attachment: Parcels within a Half Mile of Idaho-Maryland Mineral Rights

Note: This map is based on best-available information. Data was sourced from Nevada County parcel records, which rely on information from the Water Board. A PDF version of this map is available online at https://www.minewatchnc.org/post/idaho-maryland-mine-mineral-rights-map



INDIVIDUAL LETTER 129: CHRISTY HUBBARD

Response to Comment Ind 129-1

The commenter states that the DEIR is inadequate, specifically the Well Mitigation Plan, because it does not accurately depict the area in which private wells may be impacted. The commenter reasons that the approximately 525 wells within the mineral rights boundary may be impacted by the dewatering of the mine. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 129-2

The commenter poses a scenario in which a private well not included in the mitigation plan is impacted by the project. The commenter is referred to Response to Comment Ind 129-1. Regarding impacts to property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 129-3

The commenter references a previously proposed project at the project site. The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments, and Response to Comment Ind 129-1.

Response to Comment Ind 129-4

The commenter reiterates the concerns with the scope of the potentially impacted area. The commenter is referred to Response to Comment Ind 129-1. The commenter's opposition is noted for the decisionmakers.

Individual Letter 130

RISE GRASS VALLEY

Rise Grass Valley
PO Box 271
Grass Valley CA 95945

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Dist 2

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.



Please fill out and send back to us your support for the Idaho-Maryland Mine

I ~~support~~ OPPOSE re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 500 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 500 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) CHUCK CROSBY

Address 10889 BALL RD. ZIP 95949

Phone

Email Address

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

Ind 130-1

INDIVIDUAL LETTER 130: CHUCK CROPLEY

Response to Comment Ind 130-1

Please see Master Response 1.

Individual Letter 131

From: Chula Gemignani <chulagem@gmail.com>
Sent: Saturday, April 2, 2022 11:14 AM
To: Idaho MMEIR
Subject: Ground water concerns

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This mine threatens our ground water. We are dependent on the water table. I do not support this mine! I have friends on the ridge whose lives and chidrens' lives were turned upside down by mine activity. Stop this mine! NO MINE!!

TRUE GOLD is of the HEART

TRUE GOLD is of the heart dear sir, NOT the economy
Precious is this land to us, where grows true LOVE not greed.
Take my hand and walk with me, I'll show you our TRUE GOLD
Each day we wake shines a golden SUN, a treasure to behold.

Ind 131-1

Sun comes up, Sun goes down PURE GOLD for you and me.
The HEART of our universe beating rhythmically

Community can only thrive dear sir, on clean water, food and air.
Upon NATIVE lands we reside, with respect -we steward and care.
Throw your shovels to the winds, take your mining machines AWAY!
True Gold is of the HEART Mr. Mossman, we strike it EVERY DAY.

SUN comes up, SUN goes down PURE GOLD for you and me.
The HEART of our universe beating rhythmically

NO MINE and PEACE to ALL,
Chula

--

1

INDIVIDUAL LETTER 131: CHULA GEMIGNANI

Response to Comment Ind 131-1

Please see Master Response 1.

Individual Letter 132

From: Clay Olson <clayolson@gmail.com>
Sent: Saturday, April 2, 2022 9:40 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: I oppose the opening of the Rise-Goldmine

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I oppose the opening of the Rise-Goldmine

Why?
Water pollution
Well-water threat
Noise above ground
Noise and vibration from underground
Dust
Wear and tear on the roadways
Past history of Rise-Gold's Ben Mossman's environmental and economic history
Likelihood that Rise-Gold's bonds won't be enough to cover damages and cleanups.

Sincerely,
Clay Olson
PO Box 3565
Grass Valley, CA 95945-3565

Ind 132-1

1

INDIVIDUAL LETTER 132: CLAY OLSON

Response to Comment Ind 132-1

Please see Master Response 1. In addition, see Master Response 3 regarding operator responsibility.

Individual Letter 133

From: Clayton Olson
To: bdofsupervisors
Subject: I oppose approval of the Rise Gold mining venture.
Date: Thursday, February 10, 2022 9:24:19 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 133-1

I oppose approval of the Rise Gold mining venture. Although I would love more jobs to be created locally, I live in a residential town in which the majority of the living quarters and residents showed up after 1849. Anyone with a certain degree of sensitivity to noise and dust and the stress caused by the increasing traffic in Grass Valley, will have second thoughts about this venture. And anyone who wants our water, both in wells and in our creeks, to be cleaner and available, will want to vote against this venture.
Sincerely,
Clay Olson
Grass Valley

INDIVIDUAL LETTER 133: CLAY OLSON

Response to Comment Ind 133-1

Please see Master Response 1.

Individual Letter 134

From: Clea Vigneux
To: bdofsupervisors
Subject: Idaho Maryland Mine
Date: Friday, February 25, 2022 6:07:09 PM

Dist 1

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Ind 134-1

I am vehemently opposed to the Idaho Maryland mine. I am adding my voice to the many other people who feel the way I do, for the many reasons that have been already stated. Please do not approve this mine!

Thank you

--
Clea Vigneux
808-264-1526

INDIVIDUAL LETTER 134: CLEA VIGNEUX

Response to Comment Ind 134-1

Please see Master Response 1.

Individual Letter 135

Ind 135-1

From: Cliff
To: bdofsupervisors
Subject: I do NOT want an operating gold mine running in Nevada County. The very short term gains are not worth the long term consequences.
Date: Sunday, February 27, 2022 10:07:42 AM

Cannot identify Dist

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Sent from my iPhone

INDIVIDUAL LETTER 135: CLIFF CASE

Response to Comment Ind 135-1

Please see Master Response 1.

Individual Letter 136

From: Aruba <aruba_ala_nar@yahoo.com>
Sent: Monday, March 21, 2022 4:38 PM
To: Idaho MMEIR; Colleen Carson
Subject: ATTENTION: MATT KELLEY

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Hello Matt
I am writing to you to express my extreme concern about the re-opening of the Idaho-Maryland Mine.

We live 3 miles from the site and are worried that our well water quanity and quality are going to be damaged by this project.....there seems to be no way to really tell what will happen.
Other concerns are the noise and traffic with the frequency of trucks coming and going.

Ind 136-1

Our community is MUCH larger now than it was when gold mining was an every day happening around here; now there are many more people to be impacted. Many do NOT view this with warm and fuzzy nostalgia of a return to yesteryear.
Please, take care of this community and do not allow this endeavor.

Thank you
Colleen Carson
(530) 615-4404

INDIVIDUAL LETTER 136: COLLEEN CARSON

Response to Comment Ind 136-1

Please see Master Response 1.

Individual Letter 137

From: collette castro <cm4386@icloud.com>
Sent: Monday, April 4, 2022 4:45 PM
To: Idaho MMEIR
Subject: Our biggest concerns re: Idaho Mine DEIR

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To Matt Kelly and the Nevada County Planning Department,

My husband and I have a number of concerns regarding the proposed Idaho-Maryland Mine. After reviewing the DEIR, I am very concerned about the following issues:

Ind 137-1

1. Groundwater - the model used is troubling from the beginning. The assumptions made by the baseline data used make the analysis misleading. We already have some local problems with wells and loss of ground water. Climate change will make this issue worse. It is not fair to add the burden of the mine's water demands to NID's already increasing water demands. Why would we do this, endanger our water supply.

Ind 137-2

2. Greenhouse gas emissions - the latest climate change goals state that the threshold should be "net Zero' not some arbitrary limit.
Our county's air quality is already a grade "D". With increasing hot temperatures throughout the years will increase as it is. Why add more pollution by approving this mine.

Please be very careful in considering the long term effects on our citizens and community environment. Please make Rise Gold accountable on all issues brought forth by numerous and knowledgeable speakers at the March 24 meeting.

Ind 137-3

Thank you for your attention,
Collette Castro and Michael McLean
13607 Haas Court
Rough and Ready, CA 9597
530-273-5350

INDIVIDUAL LETTER 137: COLLETE CASTRO AND MICHAEL MCLEAN

Response to Comment Ind 137-1
Please see Master Responses 14 and 16.

Response to Comment Ind 137-2
Please see Master Response 27.

Response to Comment Ind 137-3
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 138

From: Connie Finster
To: Idaho MMEIR
Subject: Stamp Mill at Reopened Idaho Maryland Mine
Date: Tuesday, March 15, 2022 5:12:00 PM

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Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley:

The information about the environmental effects of reopening the Idaho Maryland Mine mention in passing, briefly, that "the ore will be processed on site." That is, most probably, a stamp mill, smashing the rock to release the gold.

Stamp mills are VERY NOISY, 24 hours a day. Guess why all the houses on Anchor Lane and Liquidambar Lane, and all the houses on Greenhorn from there to Brunswick, were built since 1960? The stamp mill, only half a mile away, was no longer there.

Ind 138-1

PLEASE get the EIR to discuss this! I can't imagine all these houses having any resale value at all with a stamp mill pounding away all day, all night.

I didn't know about stamp mills until I visited Ichthyosaur State Park in Nevada, which also includes a closed mine. The ranger/guide described the sound of the stamp mill as ground-shaking and relentless. He asked us to picture how much weight, at how much height, it would take to smash rock.

Connie Finster
14137 Liquidambar Lane, GV 95945
(530) 272-5219

7709 39th Street, Sacramento 95816
(916) 452-2355
leiskfinster@gmail.com

INDIVIDUAL LETTER 138: CONNIE FINSTER

Response to Comment Ind 138-1

Noise impacts associated with mineral processing were addressed in Impact 4.10-3 within Chapter 4.10, Noise and Vibration, of the DEIR. As discussed therein:

> The project processing equipment located within the processing building would consist of the SAG mill (primary grinding), ball mill (secondary grinding), concentrator, cyclones and screens, and filter presses. The noise transmission loss of the proposed metal building ranges from 31 dB at 125 Hz to 75 dB at 4,000 Hz. In addition, the metal building would have double doors (i.e., airlock) to prevent sound escaping when one set of exterior doors are open.
>
> Using information provided by the Project Applicant for similar facilities, the noise generation from such processing equipment is expected to be 105 dBA L_{eq} with maximum noise levels of approximately 110 dBA L_{max}.
>
> The reference noise level data for both the noise source and building enclosure were used as inputs to the SoundPlan model to calculate processing plant operations at the nearest receptors (see Figure 4.10-6). The results of those calculations are provided in Table 4.10-17. Because such processes are anticipated to occur at all hours, the most restrictive, nighttime noise criteria were applied.
>
> Based on the data presented in Table 4.10-17, the mineral processing operations would generate noise levels below the applicable nighttime standards of significance at each of the nearest sensitive receptor locations. As such, noise-related impacts from mineral processing would be less than significant.

Based on the above, impacts related to mineral processing noise were adequately addressed in the DEIR.

Individual Letter 139

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Constance Dwright

Address: 196 Northridge Dr

Organization (if applicable): Unitarian UU CM of the Mountains

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 139-1

I am very concerned about the air pollution the new mine would bring in. Also, I am worried about the traffic that would emerge. There are just 2 of the issues.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 139: CONSTANCE WRIGHT

Response to Comment Ind 139-1

Please see Master Response 1.

Individual Letter 140

From: Corinna Fish <corinna.fish@gmail.com>
Sent: Monday, April 4, 2022 2:37 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project DEIR comments

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Dear Mr. Matt Kelley,

Ind 140-1 I'm a lifelong Californian who enjoys the Yuba River every summer, attends Grass Valley's Cornish Christmas and Nevada City's Victorian Christmas every December, and makes weekend day trips as often as I can. I love Nevada County and want to share my comments on the DEIR for the proposed Idaho-Maryland Mine as a concerned neighbor of the county and regular customer of Nevada County businesses.

I'm particularly concerned about how this proposed project will affect (1) Nisenan cultural heritage; (2) wildlife and wildlife habitats and (2) dewatering and water contamination impacts.

Ind 140-2 1. Impacts to the Nisenan
On page 4.5-10, the DEIR states that InContext made attempts to contact 4 tribes via mail, email and phone from Sept 2019-Dec 2020 and did not receive responses. I'm concerned about whether sufficient effort was put into reaching each tribe. How many contact attempts were made over that period of time? Is InContext certain they had the correct information? How were these attempts to communicate framed by InContext? Can there be additional, perhaps more concerted, efforts to solicit tribal responses before the FEIR?

Ind 140-3 2. Impacts to wildlife
On pages 4.4-31 through 4.4-35, only 5 species of special concern are considered and all, except for the Western pond turtle, are described as having "very low" presence. How does the DEIR account for future presence of these species due to increased urbanization and increased wildfires? Why are trout and other aquatic species not considered? These species, along with benthic macro invertebrates, should be addressed in the FEIR.

Ind 140-4 3. Impacts to water
How did the DEIR decide upon 15 wells to estimate impacts on water supply wells, and where are those monitoring wells located? Why, on page 4.8-67, does the DEIR state that "A projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences"--how can an accurate assessment be made if it doesn't start until after dewatering begins? Finally, trying to rely solely on modeling in a fractured rock system is difficult at best, and foolhardy from a long-range perspective.

Ind 140-5 In general, it seems to me that a revised DEIR should seek out input from additional expert opinions and data from researchers not hired by Rise Gold in order to be in full compliance with CEQA requirements.

Sincerely,
Corinna Fish

INDIVIDUAL LETTER 140: CORINNA FISH

Response to Comment Ind 140-1

The commenter is concerned with cultural, wildlife, and hydrological issues. Responses to specific comments are provided below.

Response to Comment Ind 140-2

In addition to the informal tribal outreach efforts performed by InContext, the County complied with AB 52 tribal consultation requirements for the proposed project. As discussed in Response to Comment Grp 14-2, the County complied with the above requirement, despite the fact that the Nevada City Rancheria Nisenan Tribe was not added to the Native American Heritage Commission Contact/Tribal Consultation list until March 21, 2022.

As stated in the Cultural Resources chapter of the DEIR "On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, **Nevada City Rancheria Nisenan Tribe**, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and **Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period**." (DEIR p. 4.5-21, emphasis added) Additionally, the Project Proponent's cultural resource consultant, InContext, attempted to contact the Tribe on December 1, 2020 by letter, phone and email, and on December 16, 2022 by phone and email, with no response. The correspondence was addressed and sent directly to Shelly Covert, the Tribal Secretary of the Nisenan Tribe. In sum, despite a lack of recognition from the NAHC at the time, the Nisenan Tribe was still treated as a recognized tribe by the Project Proponent and the County. The Tribe received notices and was provided an opportunity to consult under AB 52.

Response to Comment Ind 140-3

The future movement of special status species to the project sites due to increased urbanization and wildfire is speculative and CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." However, Mitigation Measures 4.4-2(a) through 4.4-2(f) require pre-construction surveys, and if present, additional mitigation measures for special-status species. Trout, benthic macro invertebrates, and other aquatic species are considered in the DEIR. The commenter is referred to Chapter 4.4 and Appendix F.8 and F.10 of the DEIR and Master Responses 34 – Resident Fish, 36 – Foothill Yellow Legged Frog and California Red Legged Frog, and Response to Comment Grp 31-12 regarding benthic macroinvertebrates.

Response to Comment Ind 140-4

The commenter states that the DEIR's analysis is inadequate with regard to impacts to groundwater wells and questions where monitoring wells will be located. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. Well monitoring locations are discussed and shown in Appendix K.8 of the DEIR. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 140-5

The commenter states that the DEIR would benefit from additional expert opinion. The DEIR already incorporates expert opinion from consultants not hired by the Project Applicant and peer review of technical reports was conducted by consultants hired by the County, including Raney Planning and Management, Madrone Ecological Consulting, ECM, West Yost, Saxelby Acoustics, and TJKM.

Individual Letter 141

From: c Jones <jonescorrine11@yahoo.com>
Sent: Friday, April 1, 2022 7:17 PM
To: Idaho MMEIR
Subject: opposed

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Hello,

I am concerned about the proposed reopening of the mine. The environmental concerns appear to be downplayed and presented as inconsequential by Rise Gold when discussed. There were lots of things in the report that made me worry. One of the most troublesome is the idea of de-watering the tunnels and what impacts known or unknown that will cause. Seems like a pretty big roll of the dice to me.

My experience with living around active gold mines is (I grew up in Northern Nevada) yes they provide a few well paid jobs but the company is only concerned with extracting the resource. The bottom line is everything, the jobs are dangerous and the cleanup is minimal and the land affected is never what it was before. The mines leave when the gold price goes down and the community is left with the consequence. I can't imagine what a mining operation would be like so close to houses and our town! It's right smack in the middle of a really populated area!

Ind 141-1

I understand there is nostalgia for the gold mining days but do we really want to go back there? Nevada County is still dealing with the leftover environmental degradation from the last round. I do not trust this Canadian company to look out for our community interest. The CEO doesn't seem to have a good track record and footage I've watched of him drumming up investors paints a picture like they expect to roll right over us as our local board is the only thing in their way.

I hope that we as a community decide to keep mining in our past (not so distant if you consider what happened to the water supply near Grizzly Hill school from a mine a few years ago). I hope that we build on the new economy that has been developing here that works with our natural resources like mountain biking, and local companies and farms that are the moving with the times to a greener future. Lets not go backward, this is a terrible time to hope that some sort of environmental tragedy wont occur. We have enough to worry about in the foothills these days. Jobs can be created in other ways, we can't just bring back the land to it's former glory as we can see by the mining scars all over already, and polluted water still being cleaned from the last round.

I'm no scientist but I can understand the increased air pollution, noise and possible horrific changes to our areas water supply this mine will bring. I hope the good folks reviewing these proposals and impact reports will stand up for the citizens of this county and think of the future and our quality of life here.

Please, no mine

Thank You,

Corrine Parker Jones

10485 Broken Oak Ct Apt 101
Penn Valley, CA 95946

Sent from Yahoo Mail. Get the app

1

INDIVIDUAL LETTER 141: CORRINE JONES

Response to Comment Ind 141-1

Please see Master Responses 1, 2, and 3.

Individual Letter 142

From: Craig Arthur
To: Idaho MMEIR
Subject: Idaho Maryland Mine EIR
Date: Sunday, March 27, 2022 9:13:41 AM

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Dear Me Kelly,

I am writing you to express my concerns about the potential opening of the Idaho Maryland mine. I live on Greenhorn Road, approximately one mile from the mine site. My number one concern is what could happen to my well water. It is my understanding that Rise Gold will be supplying treated NID water service to homes on Bennet Street that are directly adjacent to the mine. This is great for those property owners but what happens to everyone else if their wells are impacted by dewatering? Like all other homeowners who depend on well water, if my well goes dry, my house is worthless. My entire life savings is tied up in my house. There are numerous studies showing significant negative impact on well water quality and yield due to dewatering. To my knowledge there are no provisions to provide water to the hundreds of homes that could be negatively impacted by the dewatering of the mine.

Ind 142-1

I belive it is critical that the EIR considers impacts of dewatering not only on properties immediately adjacent to the mine but rather on all properties in the region.

Sincerely,

Craig Arthur

14375 Greenhorn Rd.
Grass Valley, CA 95945
(539)913-4078

Get Outlook for iOS

INDIVIDUAL LETTER 142: CRAIG ARTHUR

Response to Comment Ind 142-1

Please see Master Response 1, as well as Master Responses 14 and 15.

Individual Letter 143

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA. 95959-7902

March 16, 2022

Dear Mr. Kelley:

By this letter, I would like to express my strong opposition to the reopening of the Idaho Maryland Mine.

Ind 143-1

The draft EIR shows a long list of potential problems and negative impacts, many of which I would consider significant on a stand-alone basis: Air pollution, disturbance of asbestos and other toxic substances, potential soil and water contamination, dewatering impacts (by design), settlement and subsidence concerns, increased noise, vibration and traffic, and increased demand for public services, utilities and infrastructure wear and tear. The attempt at mitigation may be partially successful, but it is highly doubtful that anything approaching complete mitigation will be possible in many of these areas.

Ind 143-2

Mining operations are part of our area's historical heritage. They were successful and appropriate for the time in which they existed. But the nature of Grass Valley has changed with the passage of years and the continuance of such operations with their obvious detrimental impact on the quality of life is no longer reasonable.

I live in the Peardale area. Every time I go to the bank or grocery shopping, or to the hardware store, I will have to contend with increased traffic, noise and pollution. This change in character will have a detrimental impact on home prices in the area and the appeal our area may currently have as a quaint, picturesque and historic getaway for tourists.

I strongly urge that acceptance of this project be denied.

Sincerely,

Craig D. Crebbin

Craig D. Crebbin
P.O. Box 625
Cedar Ridge, California 95924

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PLANNING DEPARTMENT

INDIVIDUAL LETTER 143: CRAIG CREBBIN

Response to Comment Ind 143-1
Please see Master Response 1.

Response to Comment Ind 143-2
Please see Master Responses 1 and 2.

Individual Letter 144

* → Do not support this! ← *

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 144-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Craig D McCann

Address Po Box 640, Penn Valley ZIP 95946

Phone

Email Address cmccann@zort.pro

INDIVIDUAL LETTER 144: CRAIG MCCANN

Response to Comment Ind 144-1

Please see Master Response 1.

Individual Letter 145

From: Cynthia Yaguda
To: Idaho MMEIR
Subject: Mine
Date: Saturday, March 5, 2022 7:56:22 AM

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Ind 145-1

Hi,
I live 2 miles from the mine site. I feel sick about the possible reopening of the mine. We don't want the mine. None of our neighbors want the mine. Noise and traffic at night are just 2 things we don't need. Our quality of life will be reduced and our property values will certainly decline. Our well may be affected. We don't want to leave Nevada County but we will surely sell if the mine reopened. We have been part of this community for 40 years. Please please please NO MINE!!
Cynthia Yaguda

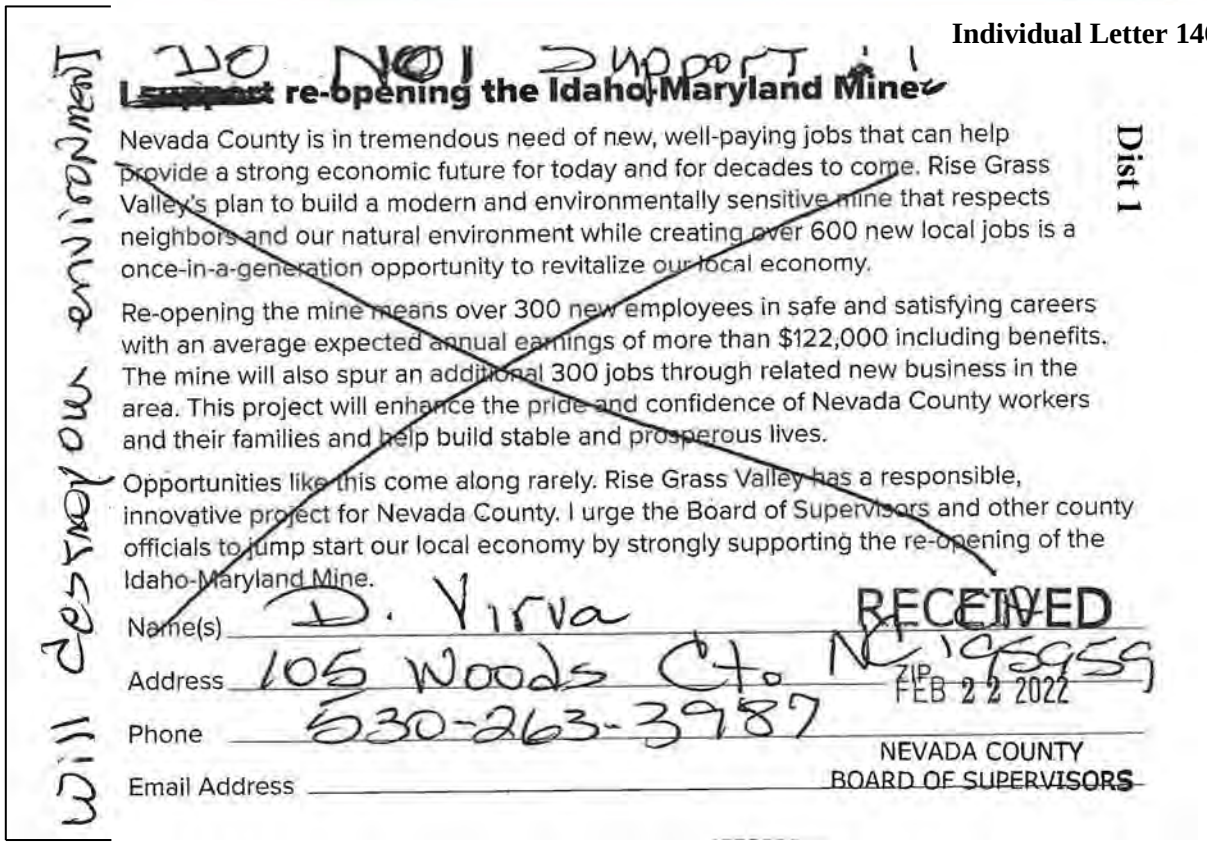
INDIVIDUAL LETTER 145: CYNTHIA YAGUDA

Response to Comment Ind 145-1

Please see Master Response 1 and 2.

Individual Letter 146

Ind 146-1



Will destroy our environment

DO NOT Support it

~~I support~~ re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) D. Virva

Address 105 Woods Ct. NC 95959

Phone 530-263-3987

Email Address

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FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 146: D. VIRVA

Response to Comment Ind 146-1

Please see Master Response 1.

Individual Letter 147

From: Daniel Behn
To: BOS Public Comment
Subject: Rise Gold
Date: Monday, January 31, 2022 8:07:32 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Supervisors,

I find myself in a quandary as to why any human being would vote to Euthanize their neighbors or for that matter any of their fellow man. Surely you know in your heart of hearts that giving way to these penny stock scoundrels would put you in the same class as hitler.

There are times in every persons life, when their is metal tested, to determine their quality of character. I consider it my responsibility to remind each of you that this is your time. Step up and show your quality of conscious to be true and good. Perhaps you have already have decided to send rise mold packing. If thats the case, congratulations for a job well done. I'm of the mind that any person who shows such strength of character deserves to have a street named after them followed by a block long parade of only the best trumpeters.

Ind 147-1

All fanfare aside, thank you, know that I do respect the office you hold.

Quiet sincerely,
Daniel D. Behn

--
Honor(comes from integrity)
Courage(from inner strength first)
Respect(too you and yours I humbly offer my Love)
Danny B.

INDIVIDUAL LETTER 147: DANIEL BEHN

Response to Comment Ind 147-1

Please see Master Response 1.

Individual Letter 148

From: Daniel Behn
To: BOS Public Comment
Subject: Rise Gold
Date: Monday, January 31, 2022 8:07:32 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 148-1

Dear Supervisors,

I find myself in a quandary as to why any human being would vote to Euthanize their neighbors or for that matter any of their fellow man. Surely you know in your heart of hearts that giving way to these penny stock scoundrels would put you in the same class as hitler.

There are times in every persons life, when their is metal tested, to determine their quality of character. I consider it my responsibility to remind each of you that this is your time. Step up and show your quality of conscious to be true and good. Perhaps you have already have decided to send rise mold packing. If thats the case, congratulations for a job well done. I'm of the mind that any person who shows such strength of character deserves to have a street named after them followed by a block long parade of only the best trumpeters.

All fanfare aside, thank you, know that I do respect the office you hold.

Quiet sincerely,
Daniel D. Behn

--
Honor(comes from integrity)
Courage(from inner strength first)
Respect(too you and yours I humbly offer my Love)
Danny B.

INDIVIDUAL LETTER 148: DANIEL BEHN

Response to Comment Ind 148-1

Please see Master Response 1.

Individual Letter 149

From: Danielle Boucher <danielle@acupuncturespot.com>
Sent: Monday, April 4, 2022 1:02 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: opposition to the mine

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Mr Matt Kelley,

Thank you for taking the time to hear from the community about our thoughts on the reopening of the Idaho-Maryland Mine. I am writing in firm opposition to reopening the mine. I went into the process of looking at the impact of the mine with an open mind, and soon realized that the cons far outweigh any pros.

Ind 149-1

My biggest concern is the environmental impact, and, as a practitioner, how that in turn would also impact the health of our community. Water is a valuable resource, especially these days in times of drought, and any potential danger to our water sources should not be a risk we are willing to take. This has been an issue with mining in the past, the not so distant past, and is something that no company can guarantee won't be an issue again. Opening ourselves up right now to more potential environmental issues does not seem like the right direction we should go, especially at a time when the impacts of global warming are becoming even more apparent and we should be focusing on how to fix the problems we already have. I'd love to see our resources and community effort go towards protecting the nature we love and protecting our community in sustainable ways against wildfires. As a recent transplant to the Nevada County area, I came up here for the community and nature. I'm proud to see this community coming together to stand up against a business proposition that could cause us so much harm, and that threatens the nature that keeps us all dedicated to this area.

Ind 149-2

In addition, RISE Gold has a horrible track record of their business practices and involvement in communities, there is no guarantee that they won't come in, make a mess, and leave us all to clean up their mess. I'd love to see our efforts going towards building more sustainable, community and nature focused opportunities rather than ones that can cause damage, destruction and health issues.

Thank you for your time.

Warmly,
--
Danielle Boucher, L.Ac.
The Acupuncture Spot
www.acupuncturespot.com
to schedule click here
206 Providence Mine Road Suite 115
Nevada City, CA 95959
530-440-8474

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1

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2

INDIVIDUAL LETTER 149: DANIELLE BOUCHER

Response to Comment Ind 149-1
Please see Master Response 1.

Response to Comment Ind 149-2
Please see Master Response 3.

Individual Letter 150

From: danny.milman@gmail.com
Sent: Sunday, April 3, 2022 3:56 PM
To: Idaho MMEIR
Subject: Draft EIR - Rise Gold - Questions

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Good afternoon, Matt.

After reading the report and listening to public comments, here is a list of the questions I hope will be addressed by the next version.

Ind 150-1

Danny
Danny Milman
562.338.2565
danny.milman@gmail.com

Rise Gold Draft EIR Questions

	Section	Category	Question
Ind 150-2	General	General	What criteria will be used to judge the mine's performance in the future?
Ind 150-3	General	General	How will performance goals be mointored, assessed and evaluated at regular intervals?
Ind 150-4	General	General	What are the penalties for non-compliance?
Ind 150-5	General	General	In (5) of the categories of impacts, the data assumes that the clean up at Centennial has been done, while in the remaining (8) categories, the assumption is that Centennial has not been completed. What are the differences in impacts if the same assumption is made for all (13) categories?
Ind 150-6	General	General	Where are the regular monitoring results taken since Rise Gold purchased the site that could be used to set baselines for future monitoring?
Ind 150-7	General	General	How were other nearby projects taken into account and included in some type of cumulative impact evaluation?
Ind 150-8	General	General	Why does the DEIR information not match the filing with the SEC?
Ind 150-9	General	General	What plans are in place to conserve resources and reduce long term use?
Ind 150-10	General	General	Will the oprations be required to meet new standards as they are put into place, or will the project be grandfathered in for the entire 80 years?
Ind 150-11	1	Aesthetics	How does the traffic model take a rural population into effect when a road is deemed minor?
Ind 150-12	1	Aesthetics	How will night time lights affect the surrounding residential uses?
Ind 150-13	1	Aesthetics	How are night time lights shown in the aesthetic impacts?
Ind 150-14	1	Aesthetics	How can it be that a 165' tower would not be visible from several viewpoints?
Ind 150-15	1	Aesthetics	The "After" renderings show the majority of the complex is hidden by new landscaping. How long would the landscaping need to grow before the complex is hidden to that degree?

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Ind 150-16	3	Air Quality	How do the air quality models take the region's existing poor air quality into account?
Ind 150-17	3	Air Quality	How do the filtration systems take the asbestos dust into account from crushing serpentine rock?
Ind 150-18	3	Air Quality	How is the air quality impact on the region (as opposed to the immediate site) measured and mitigated?
Ind 150-19	3	Air Quality	If 700K metric tons of greenhouse gas emissions will be generated over 80 years, why will there only be 2444 carbon offsets?
Ind 150-20	4	Biological	Many videos online show a variety of wildlife at or near the site. Why were these animals not taken into account in the report?
Ind 150-21	4	Biological	What type of bird survey was done for the DEIR? Was the survey done early when there are likely to be birds?
Ind 150-22	4	Biological	How was the conservation easement downstream included in the evaluation of impacts?
Ind 150-23	4	Biological	Why were recent surveys of wildlife, birds and plants not taken into account in the DEIR?
Ind 150-24	4	Biological	How is the habitat restoration bond amount calculated?
Ind 150-25	4	Biological	What state of restoration is required to meet the bond?
Ind 150-26	4	Biological	What are the impacts on fish & wildlife who move within the creek, such as fish swimming upstream?
Ind 150-27	4	Biological	What are the cumulative impacts on wildlife?
Ind 150-28	4	Biological	Where is the existing surface water quality documented?
Ind 150-29	7	Hazards	What is the most shallow depth where explosives will be used? Was this depth taken into account in the modeling and vibration information?
Ind 150-30	7	Hazards	Is it true that an earthquake fault has been removed from the EIR and associated maps?
Ind 150-31	7	Hazards	What is the plan for accidents? What level of accidents are anticipated? What impact should be expected when that happens?
Ind 150-32	7	Hazards	What are the odds of a tunnel collapse?
Ind 150-33	7	Hazards	How was the past history of environmental impacts to the region taken into account?
Ind 150-34	7	Hazards	How will the hexavalent chromium, sulfuric acid, and other chemicals be stored?
Ind 150-35	7	Hazards	How will workers be protected from the asbestos silica in the rock?
Ind 150-36	8	Water	How are wells that do not show on the State's online database addressed? NID records show that more mines exist, even in the area of the (30) that are planned for hookup to NID.
Ind 150-37	8	Water	Why does the NID estimate of the number of affected wells differ substantially from the DEIR?
Ind 150-38	8	Water	How has the hydrology changed in the last 15 years since the studies were done?
Ind 150-39	8	Water	How will the water impacts change over the 80 proposed years?
Ind 150-40	8	Water	How does the hydrology model account for the rock if it turns out not to be homogenous?
Ind 150-41	8	Water	If operations lower the water level in neighboring wells, what is the acceptable limit on this?
Ind 150-42	8	Water	From how far outside the mineral rights area will the mine draw water from?
Ind 150-43	8	Water	How many water samples were taken and were they representative of the different tunnels?
Ind 150-44	8	Water	Why is NID water usage estimated at .4 gallons per minute but capped at 400 per day instead of 576?
Ind 150-45	8	Water	What will happen to the water, land and tunnels once the mine has closed?



Ind 150-46	8	Water	Why does the mine not reuse the treated water from dewatering efforts?
Ind 150-47	8	Water	Why would the payment for NID water not transfer to future homeowners?
Ind 150-48	8	Water	Will the neighboring wells be sampled and measured in advance for a base line?
Ind 150-49	8	Water	Will the connection to NID be made in advance of the dewatering?
Ind 150-50	8	Water	Are the new impervious surfaces (paving, roofing, etc.) accounted for in the hydrology and runoff reports?
Ind 150-51	8	Water	How would the project be a net water producer as stated in the DEIR?
Ind 150-52	9	Land Use	What is the shortest amount of time that a permit could be issued for where Rise Gold would still move ahead?
Ind 150-53	10	Noise	How can it be true that the ambient noise at the neighboring properties will be less after the mine goes into production, day & night?
Ind 150-54	10	Noise	What are the impacts of sustained noise over months and years?
Ind 150-55	10	Noise	Why would the allowed noise differ from the already established noise regulations?
Ind 150-56	11	Utilities	How are the County goals for energy conservation and greenhouse gas reduction into account?
Ind 150-57	11	Utilities	Does the anticipated greenhouse gas release meet SB32 limits?
Ind 150-58	11	Utilities	What plans are included for EV vehicles, reuse of water, solar energy, etc.?
Ind 150-59	12	Transportation	What is the traffic impact during evacuations?
Ind 150-60	12	Transportation	Are the trucks included in the impacts in the other categories such as air quality and noise? Or just in the traffic?
Ind 150-61	13	Wildfire	How will explosives stored on site be protected in the case of wildfire?
Ind 150-62	13	Wildfire	How will the 24K gallons of diesel stored on site be protected in the case of wildfire?
Ind 150-63	13	Wildfire	What are the traffic impacts during a wildfire evacuation?
Ind 150-64	13	Wildfire	How will chromium and other chemicals stored on site be protected in the case of wildfire?
Ind 150-65	13	Wildfire	What is the maximum number of people who would be on site at any given time? What is the evacuation plan for them?
Ind 150-66	13	Wildfire	How has the more pronounced dry/wet cycles been taken into account in the wildfire plan?
Ind 150-67	Alternatives	Alternatives	What alternate sites are there for disposal of the tailings?
Ind 150-68	Alternatives	Alternatives	What alternate mixed used projects were considered?
Ind 150-69	Alternatives	Alternatives	What is a typical permit term for a gold mine in other localities?
Ind 150-70	Alternatives	Alternatives	Why was the previously approved Industrial Center not included?
Ind 150-71	Alternatives	Alternatives	What other alternatives has the County Planning staff considered for this site?

INDIVIDUAL LETTER 150: DANNY MILMAN

Response to Comment Ind 150-1
The commenter has prepared specific comments after listening to public comments and reviewing the DEIR. The comment is noted. Responses to comments are provided below.

Response to Comment Ind 150-2
The commenter asks what criteria will be used to measure the project's performance in the future. It is assumed that the commenter is referring to the project's compliance with regulatory standards and implementation of mitigation measures. A mitigation monitoring and reporting program will be required to enforce all mitigation measures imposed in the DEIR (see Chapter 4 of this Final EIR).

Response to Comment Ind 150-3
The commenter asks how the project's performance goals will be measured. It is assumed that the commenter is referring to the project's compliance with regulatory standards and implementation of mitigation measures. As stated on page 4.6-22 of the DEIR, Nevada County General Plan Policy 17.7 states that each project shall have a periodic review for compliance with the use permit by the County Planning Department. In no case shall such review time period exceed five years. Said review shall be funded by the Project Applicant. The commenter is also referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 150-4
The commenter asks what penalties the County will impose if regulatory standards or mitigation measures are not adhered to. The commenter is referred to Master Response 3 -Operator Responsibility.

Response to Comment Ind 150-5
The commenter asks why various portions of the DEIR assume the cleanup of the Centennial Industrial Site will be completed prior to commencement of the project. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 150-6
The commenter asks where the regular monitoring results are taken since the Project Applicant purchased the site that could be used to set baselines for future monitoring. The specifics of which monitoring results are not provided by the commenter; therefore, a response is not possible.

Response to Comment Ind 150-7
The commenter asks how other nearby projects were taken into account and included in some type of cumulative impacts evaluation. Cumulative Impacts and projects taken into account for analysis of cumulative impacts are discussed in Section 5.3 (Cumulative Impacts) of the DEIR. A cumulative impact evaluation, specific to each CEQA topic, is included at the end of each technical chapter of the DEIR.

Response to Comment Ind 150-8
The commenter asks why the DEIR information does not match the filing with the SEC. The commenter does not specify what information in DEIR does not match the SEC. The Project Applicant's filings with the SEC have no relevance to the analysis of the DEIR. The commenter is

referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 150-9

The commenter asks what plans are in place to conserve resources and reduce long term use, but does not specify which resources; therefore, a response is not possible. For conservation of biological resources, see Chapter 4.4 of the DEIR.

Response to Comment Ind 150-10

The commenter asks if the operations will be required to meet new standards as they are put into place, or will the project be grandfathered in for the entire 80 years. The project mitigations and conditions of approval will not change throughout the length of the Conditional Use Permit. However, the project will be required to meet any state or federal regulations or standards imposed over the life of the project.

Response to Comment Ind 150-11

The commenter asks how the traffic model take a rural population into effect when a road is deemed minor. The DEIR's traffic model uses traffic counts to analyze impacts and does not consider "roads deemed minor" in the analysis. The County has different minimum levels of service for Rural Regions and Community Regions of the County, as discussed on page 4.12-19 of the DEIR.

Response to Comment Ind 150-12

The commenter asks how nighttime lights affect the surrounding residential uses. As stated on page 4.1-29 of the DEIR, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less than significant impact would occur. As stated on page 4.1-24 of the DEIR:

> Based on the proposed lighting types and locations discussed above, a Photometric Plan was prepared for the Brunswick industrial Site by a registered professional electrical engineer (M. Niels Engineering, Inc.). Figure 4.1-2 through Figure 4.1-5 present the Photometric Plan and increases in visible light that are estimated to occur following implementation of the proposed exterior lighting plan. Key considerations include effects to the night sky, which are addressed through the lighting types proposed, as discussed above. The other key consideration are the lighting intensities at the property boundaries near locations where existing sensitive receptors are in close proximity.
>
> As shown in the figures, the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles[9], and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

Response to Comment Ind 150-13

The commenter asks how nighttime lights are shown in the aesthetic impacts. Figures 4.1-2 through 4.1-5 of the DEIR show lighting photometric drawings.

Response to Comment Ind 150-14

The commenter asks how a 165-foot tower (the Brunswick headframe) would not be visible from several viewpoints. The commenter is referred to Chapter 4.1 (Aesthetics) and Appendix D of the DEIR.

Response to Comment Ind 150-15

The commenter states that the "After" renderings show the majority of the complex is hidden by new landscaping and asks how long landscaping would need to grow before the complex is hidden to that degree. As stated on page 4.1-14 of the DEIR, photographic simulations were prepared to illustrate conditions at completion of all proposed structures (18 months after construction begins) and at completion of the engineered fill pads with vegetated slopes (five to six years after fill placement begins). Vegetation planted at the time implementation of the project begins would be five to six years old when each engineered fill pad reaches its ultimate size; thus, planted vegetation is represented at five to six years old in the simulations. This age of vegetation is shown in Figures 4.1-11 through 4.1-20 in the DEIR. As stated on page 4.1-16 and 4.1-17 of the DEIR, the planted would trees reach maturity in approximately 30 years which is shown in figures annotated as “full vegetation growth” in Appendix D.

Response to Comment Ind 150-16

The commenter asks how the DEIR’s air quality models take the region's existing poor air quality into account. The commenter is referred to Master Response 18 - Air Quality Thresholds. The NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public’s health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions.

Response to Comment Ind 150-17

The commenter asks how the filtration systems take the asbestos dust into account from crushing serpentine rock. Air filtration is contemplated in Section 6.1 of the ASUR Plan (Appendix E.2) when planned tunnelling in barren rock is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass of equivalent PCM units. Asbestos emissions are controlled by utilizing dust collection (air filtration). If such tunneling were to be undertaken, the rock would not be crushed as described in Section 6.1 of the ASUR Plan.

Response to Comment Ind 150-18

The commenter asks how the air quality impacts to the region (as opposed to the immediate site) are measured and mitigated. As discussed on page 4.3-41 of the EIR, the NSAQMD establishes thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public’s health, and Air Quality Management District thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local Air Quality Management District, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. Regarding the health risk assessment, the threshold of significance for exposure to toxic air contaminants is based on an incremental increase in cancer and non-cancer risk associated with a project. As such, the baseline concentration does not factor into this impact determination.

Response to Comment Ind 150-19

The commenter asks if 700K metric tons of greenhouse gas emissions will be generated over 80 years, why will there only be 2,444 carbon offsets. Mitigation Measure 4.3-7(b) requires the applicant to offset construction emissions below the 1,100 metric ton carbon dioxide equivalent per year construction threshold. As discussed on page 4.3-94 of the DEIR, the project would not exceed the applied threshold of 10,000 MT CO_{2e} per year during operations and reclamation. Therefore, no carbon offsets are required for operations. The commenter is also referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 150-20

The commenter states that many videos online show a variety of wildlife at or near the site and asks why these animals were not taken into account in the report. The commenter is referred to Response to Comment Ind 585-18.

Response to Comment Ind 150-21

The commenter asks what type of bird survey was done for the DEIR and if the survey done early when there are likely to be birds. The commenter is referred to Chapter 4.4 (Biological Resources) of the DEIR, Master Response 30 - Biological Study Technical Adequacy, and Master Response - 37- Birds and Raptors.

Response to Comment Ind 150-22

The commenter asks how the conservation easement downstream is included in the evaluation of impacts. It is assumed the commenter is referring to the "Bennett Street Grasslands" on South Fork Wolf Creek. The legal status of the conservation easement owned by the Bear Yuba Land Trust is not relevant to the analysis of the DEIR. The commenter is referred to Responses to Group Letter 2. The commenter is also referred to Master Responses 32 – Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 34 – Resident Fish, Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek, Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Frog and California Red Legged Frog.

Response to Comment Ind 150-23

The commenter asks why recent surveys of wildlife, birds, and plants were not taken into account in the DEIR, but provides no specifics on which surveys are not taken into account. The commenter is referred to Chapter 4.4 (Biological Resources) of the DEIR and Master Responses 30 – Biological Study Technical Adequacy, Master Response 31 – Rare Plants, Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 150-24

The commenter asks how the habitat restoration bond amount is calculated but provides no details as to what habitat restoration bond is referenced. No response is possible, nor is bonding required to be addressed in the DEIR.

Response to Comment Ind 150-25

The commenter asks what state of restoration is required to meet the bond but provides no details as to what bond is referenced. The commenter is referred to the Reclamation Plan in Appendix C of the DEIR.

Response to Comment Ind 150-26

The commenter asks what the impacts to fish and wildlife are, such as fish swimming upstream. The commenter is referred to Chapter 4.4 (Biological Resources) of the DEIR and Master Response 34 – Resident Fish.

Response to Comment Ind 150-27

The commenter asks what the project's cumulative impacts to wildlife are. The commenter is referred to Chapter 4.4 (Biological Resources) of the DEIR, Impact 4.4-6.

Response to Comment Ind 150-28

The commenter asks where the existing surface water quality is documented. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendix K.2 of the DEIR.

Response to Comment Ind 150-29

The commenter asks what is the shallowest depth where explosives will be used, and if this depth is taken into account in the modeling and vibration information. As discussed in Appendix M of the DEIR, blasting would take place 500 feet and deeper, except for the service shaft, which would breakthrough to the surface. Blasting vibrations were calculated for the service shaft and for drifting and longhole blasting at 500 feet below ground surface and deeper.

Response to Comment Ind 150-30

Page 4.6-4 of the DEIR states:

> NV5 believes the feature [inferred fault in Brunswick vicinity] formed during the Mesozoic era, at least 65 million years ago. They consider it inactive and designate it as a Type C fault zone "with a low seismicity and a low rate or occurrence". Based on ECM's knowledge of the geology of the area, we are in agreement with NV5's conclusion, and no evidence has been found that suggests there might have been any recent fault movement in the general site area. In support of NV5's and ECM's conclusion, further review of the Chico quadrangle map shows that Saucedo and Wagner's interpretation of the fault shows it to terminate at the north edge of mapped Tertiary volcanics (MPv), at a location a little over a half mile south of the New Brunswick Shaft. Since the map does not show the fault crossing the volcanic unit, we conclude that there has been no fault movement to break the overlaying Miocene volcanic rock since its deposition in the Miocene Epoch 5 to 23 million years ago. If otherwise, the overlying Miocene volcanic unit would also be displaced, or at least fractured.

As discussed in Section 4.5-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85.

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. The County's independent consultant, ECM, concurred with this determination.

While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

Response to Comment Ind 150-31

The commenter asks what the plan for accidents is, the level of accidents that are anticipated, and what impact should be expected when that happens. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 150-32

The commenter asks what the odds are of a tunnel collapse. Near surface workings were evaluated in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and were found to be a less than significant impact after mitigation. (DEIR, p. 4.6-29.) The commenter is also referred to Master Response 29 – Near Surface Workings.

Response to Comment Ind 1150-33

The commenter asks how the past history of environmental impacts to the region was taken into account but provides no further details. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 150-34

The commenter asks how hexavalent chromium, sulfuric acid, and other chemicals will be stored. The project does not propose to use or store hexavalent chromium. The details of volumes of reagents located on-site are not required for the analysis of the DEIR and further, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) As stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site.

Response to Comment Ind 150-35

The commenter asks how workers will be protected from the asbestos silica in the rock. Occupational (worker) health and safety in mines is governed by the U.S. Mine Safety and Health Administration (MSHA). Please also see Master Response 21 – Silica Health Risk.

Response to Comment Ind 150-36

The commenter asks how the DEIR addresses wells that are not indicated on the State's online database. All available details about well construction and testing in the area of impact have been reviewed and tabulated from well completion reports, which are available for the majority of properties. Additional well information will be collected, if necessary, as part of the Well Mitigation Plan (Appendix K.9), which has been revised to clarify this and is attached to the Final EIR as Appendix D.

The commenter states that NID records show that more mines exist, even in the area of the 30 properties to be connected to the NID. The commenter provides no information regarding the referenced NID records or evidence of more mine workings that have not been included in the analysis; and therefore, no response is provided.

Response to Comment Ind 150-37

The commenter states that NID estimates of the number of affected wells differs substantially from the DEIR. The commenter provides no information on the referenced NID estimate. The commenter is referred to responses to Agency Letter 10 and Master Response 13 - Historic Hydrogeologic Assessments.

Response to Comment Ind 150-38

The commenter asks how the hydrology has changed in the last 15 years since the studies were done. Water level data has been collected for many years over a period spanning two decades. As stated on page 26 of Appendix K.2, monitoring of water level in wells for up to 79 wells was undertaken from 1995-2001 and 2003-2007. As noted in the report, no long-term increasing or decreasing trends are observed in the data. Therefore, the age of the sample data does not limit the usefulness of this data. The commenter is also referred to Master Response 13 – Historic Hydrogeologic Assessments.

Response to Comment Ind 150-39

The commenter asks how hydrology-related impacts will change over 80 years, the life of the project. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), Appendices K.2 and K.3 of the DEIR, and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 150-40

The commenter asks how the hydrology model accounts for the rock if it turns out not to be homogenous. The groundwater model does not assume that rock is homogenous and includes geological units, faults, and changes in hydraulic conductivity with depth. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendices K.2 and K.3 of the DEIR. The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 150-41

The commenter asks what the acceptable limit is for the lowering of the water level in neighboring wells. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendices K.2 and K.3 of the DEIR. The commenter is also referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 150-42

The commenter asks to what extent within the mineral rights boundary the dewatering of the mine will draw down water levels. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), Appendices K.2 and K.3 of the DEIR, and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 150-43

The commenter asks how many water samples were taken and were they representative of the different tunnels. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and

Appendices K.2 of the DEIR, as well as Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 150-44

The commenter asks why NID water usage is estimated at 0.4 gallons per minute but capped at 400 per day instead of 576. The commenter is referred to Response to Comment Agcy 10-4.

Response to Comment Ind 150-45

The commenter asks what will happen to the water, land, and tunnels once the mine has closed. The commenter is referred to the Reclamation Plan, Appendix C of the DEIR.

Response to Comment Ind 150-46

The commenter asks why the mine does not reuse the treated water from dewatering efforts. As discussed on pages 3-39 and 3-40 of the DEIR, treated groundwater is used for mine service water, dust suppression at the Brunswick site, and for makeup water in the process plant. As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to.

Response to Comment Ind 150-47

The commenter asks why the payment for NID water would not transfer to future homeowners. The commenter is referred to Response to Comment Agcy 10-6.

Response to Comment Ind 150-48

The commenter asks if the neighboring wells be sampled and measured in advance for a baseline. Water quality baseline will be sampled in advance of dewatering at monitoring wells and not in domestic water wells. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 150-49

The commenter asks if the connection to NID will be made in advance of the dewatering. Mitigation Measure 4.8-2(c) requires that prior to commencement of initial mine dewatering, the Project Applicant shall implement the Well Mitigation Plan by connecting 30 properties in the East Bennett Road area to the NID potable water system.

Response to Comment Ind 150-50

The commenter asks if new impervious surfaces (paving, roofing, etc.) are accounted for in the hydrology and runoff reports. As stated on page 4.8-73 of the DEIR, the hydrologic calculations and detention studies for both sites anticipate runoff at potential future industrial development levels, though industrial development is not proposed at this time, and separate environmental review and permitting through the County would be required prior to any on-site industrial development. Therefore, the sizing of the detention basins is conservative.

Response to Comment Ind 150-51

The commenter asks how the project would be a net water producer as stated in the DEIR. As discussed on page 10 of Appendix N of the DEIR, the project will produce a surplus of water from the natural groundwater flow into the ground workings. Once the initial dewatering is completed, approximately 1,224,000 gallons per day are estimated to be pumped to the surface on an on-going basis and treated at the water treatment plant to maintain the dewatered mine. The groundwater consumed during operations is estimated to be 84,000 gpd.

Response to Comment Ind 150-52

The commenter asks what is the shortest amount of time that a permit could be issued where the Project Applicant would still move ahead with the project. The investment criteria of the applicant are not known or required to be analyzed in the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. Nevada County General Plan Policy 17.7 states that "Use permit time limits for each project shall be established on a case-by-case basis. Time limits shall be based on the reasonably expected life of the mining operation and potential conflicts with future neighboring land uses." (DEIR, p. 4.6-22.)

Response to Comment Ind 150-53

The commenter asks how ambient noise levels at the neighboring properties will be less after the mine goes into production, day and night. The noise analysis was not intended to imply that the project would result in an overall decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it estimates that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences. The commenter is referred to Response to Comments Ind 585-2 and 585-4.

Response to Comment Ind 150-54

The commenter asks what the impacts are of sustained noise over months and years. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix L of the DEIR.

Response to Comment Ind 150-55

The commenter asks why the allowed noise differs from the already established noise regulations. The project would be compliant with established noise regulations. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix L of the DEIR.

Response to Comment Ind 150-56

The commenter asks how the DEIR takes into account the County's goals for energy conservation and GHG reduction. The commenter is referred to Master Response 25 – Nevada County Energy Action Plan, and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 150-57

The commenter asks if the anticipated GHG emissions meet Senate Bill 32 limits. Senate Bill 32 is a statewide GHG emissions plan. The commenter is referred to Master Response 27 – Greenhouse Gas Thresholds. As a basis for choosing 10,000 MT CO_2e as the threshold of significance for operational GHG emissions, the DEIR provided the following reasoning: "For operations, because the project is an industrial project that includes stationary sources (i.e., diesel generators used for emergency power), the project's GHG emissions were compared to the 10,000 MT CO_2e per year quantitative threshold, which, as described above, is used by SMAQMD, PCAPCD, BAAQMD, and SCAQMD for industrial and/or stationary source emissions

of GHGs. The substantial evidence for this GHG emissions threshold is based on the expert opinion of various California air districts, which have applied the 10,000 MT CO_2e per year threshold in numerous CEQA documents where those air districts are the lead agency." (DEIR, p. 4.3-43.)

With respect to PCAPCD's use of the MT CO2e per year operational threshold, it is noted that on October 13, 2016, the PCAPCD adopted GHG emissions thresholds, which were designed to analyze a project's compliance with applicable State laws including AB 32 and SB 32.[1] Insofar as the project's operational emissions are below the above-stated threshold (DEIR, Table 4.3-23), the project's emissions would not impede attainment of SB 32 goals. Additionally, Mitigation Measure 4.3-7(b) of the DEIR requires the purchase of carbon offsets for construction GHG emissions to reduce the impact to a level of insignificance.

Response to Comment Ind 150-58

The commenter asks whether the project includes plans are electronic vehicles, reuse of water, solar energy, or other renewable sources of energy.

All of the underground mine vehicles would be electric vehicles, as discussed in Chapter 3 (Project Description), Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and Appendix E.1 of the DEIR. The proposed parking lot includes 14 electric vehicle charging spaces, as shown in Table 3-6 of the DEIR.

As discussed on pages 3-39 and 3-40 of the DEIR, treated groundwater is used for mine service water, dust suppression at the Brunswick Industrial Site, and for makeup water in the process plant. As stated on page 3-39 of the DEIR, the process plant would run on a closed circuit (recycling of all process water). As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to.

Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis.

Response to Comment Ind 150-59

The commenter asks what the project's traffic impacts are during evacuations. The commenter is referred to Master Response 5 – Evacuation Zones.

Response to Comment Ind 150-60

The commenter asks whether the trucks are included in the impacts in the other categories such as air quality and noise or just in the traffic. Trucks are analyzed in both the air quality and noise

[1] Placer County Air Pollution Control District. *California Environmental Quality Act Thresholds of Significance: Justification Report*. October 2016.

Chapters of the DEIR. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and 4.10 (Noise and Vibration) of the DEIR.

Response to Comment Ind 150-61

The commenter asks how explosives will be stored on site and protected in the case of wildfire. Explosives will be stored underground as described in Chapter 4.7 (Hazards and Hazardous Materials) of the DEIR. As discussed at length in Chapter 4.7 of the DEIR, transport, storage, and use of explosives is highly regulated by all levels of government. In addition, as stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site. Mitigation Measure 4.13-2 requires the applicant to submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during the project construction, operations, and reclamation activities.

Response to Comment Ind 150-62

The commenter asks whether the 24,000 gallons of diesel stored on site will be protected in the case of wildfire. As stated on page 4.7-29 of the DEIR:

> The tanks would be located in the industrial building complex area. Diesel fuel is considered a Class II liquid, and as such, the tanks would be regulated in accordance with Chapter 23 of the California Fire Code (CFC). Chapter 23 of the CFC includes robust design requirements for above-ground fuel storage tanks, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. Compliance with CFC requirements, as determined by the Fire Marshall's Office, at time of improvement plan review, would reduce fire hazards, including potential leaks, related to on-site fuel storage tanks.

In addition, as stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site. Mitigation Measure 4.13-2 requires the applicant to submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during the project construction, operations, and reclamation activities.

Response to Comment Ind 150-63

The commenter asks what the project's traffic impacts are during wildfire evacuation. The commenter is referred to Master Response 5 – Evacuation Zones.

Response to Comment Ind 150-64

The commenter asks how chromium and other chemicals will be stored on site and protected in the case of wildfire. The project does not propose to use or store chromium. The details of chemical storage located on-site are not required for the analysis of the DEIR and further, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.). As stated on page 4.7-31 of the DEIR, implementation of Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous

materials, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials on-site. Mitigation Measure 4.13-2 requires the applicant to submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during the project construction, operations, and reclamation activities.

Response to Comment Ind 150-65

The commenter inquires about the maximum number of project employees that would be on site at any given time and what is the evacuation plan for them. The DEIR indicates that a maximum of 111 employees are expected during a shift at the Centennial or Brunswick Industrial Sites. (DEIR, Table 3-8, p. 3-37.) The commenter is also referred to Master Response 5 – Evacuation Zones.

Response to Comment Ind 150-66

The commenter asks how the DEIR has accounted for the more pronounced dry/wet cycles in the wildfire plan. The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 150-67

The commenter asks what alternate sites are available for the disposal of the tailings. The commenter is referred to Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 150-68

The commenter asks what alternative mixed-used projects were considered. No alternative mixed-use projects were considered in the DEIR. The reasonable range of alternatives considered in the DEIR are discussed in Section 2.4 and Chapter 6 of the DEIR.

Response to Comment Ind 150-69

The commenter asks what the typical permit term for a gold mine is in other localities. This comment is too general for a response. Nevada County General Plan Policy 17.7 states that "Use permit time limits for each project shall be established on a case-by-case basis. Time limits shall be based on the reasonably expected life of the mining operation and potential conflicts with future neighboring land uses." (DEIR, p. 4.6-22.)

Response to Comment Ind 150-70

The commenter asks why the previously approved Industrial Center was not included. The Nevada County Business and Industrial Centre was analyzed as part of the No Project alternative and is discussed on pages 6-11 through 6-13 of the DEIR.

Response to Comment Ind 150-71

The commenter asks what other alternatives the County Planning staff considered for this site. All alternatives considered in the DEIR are discussed in Section 2.4 and Chapter 6 of the DEIR.

Individual Letter 151

From: Daun Langston
To: Idaho MMEIR
Cc: daunlangston@gmail.com
Subject: Rise Mine EIR Comments
Date: Monday, April 4, 2022 4:21:07 PM

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Ind 151-1

The Porter-Cologne Act, also known as the California Water Code, Section 7, describes 31 separate elements that must be monitored before discharge into a creek. One example (31) elements that must be monitored is temperature of the discharge water in comparison to the temperature of the creek. The standards set within these regulations require the creek to be measured upstream prior to discharge and then the temperature or the creek post discharge. The regulations state the total divergence of the net temperature must not be more than five degrees. This indicates the net change in creek temperature can not change practically than 4.4 degrees Fahrenheit. That is the difference between the measured water temperature upstream and same downstream minus the accuracy of the measurement device warranting a difference of no more than five degrees allowed by regulation.

In the case of the Empire Mine Study in 1969, this was found to be nearly impossible to comply because of the volume of water being discharged in comparison to the volume of water in the creek and the large amount of heating the water was exposed to by treatment on the surface.

The EIR must describe in detail how compliance with the California Water Code, Section 7, will be achieved. It must describe the instrumentation for compliance in detail. To recall, the proposed discharge will fill Englebright Lake every eighteen months.

Ind 151-2

The primary contamination element in the water is Realgar is not addressed once in the EIR. Realgar, a sulfides of arsenic, was the primary water contaminate mentioned in the Empire Mine 1969 Study by Newmont conducted by Stanford Research Inst. on behalf of Newmont Mines for the proposed reopening of the Empire Mine. At that time, it was determined that Realgar, which always occurs with gold in the area of the Empire mine is safe and stable until it is exposed to free oxygen and light at around 715 nm in wavelength. Only under these conditions Realgar converts to a free form of water-soluble arsenic. The current proposed plan to treat this form of arsenic is not known reduce this form of arsenic in solution with water. The only suitable and safe method proposed in the Newmont Report for the Empire is an ionic exchange with resins specially designed and ion loaded to bond with the resins and metal sulfides. There are other less concerning sulfides which are safe and stable until exposed to free oxygen. These are not addressed. This subject of Realgar must be addressed in detail. Apparently, the draft has no knowledge of the occurrence of metal sulfides in gold bearing hydro vents which is the reason why gold is present. Metal bearing sulfides

are required chemically to transport gold in thermal hydro vents. It is always assumed metal sulfides are present unless the gold has been exposed to light and air for a period of time of several hundred years. This is a very basic engineering premise of USGS when dealing with hydro vent gold structures and water. To not deal with this issue exposes the lack of detailed knowledge of the authors of the EIR have concerning the treatment of water in Sierra Gold Strata.

The water treatment plan is required to have some comprehensive cogent presentation on how the metal sulfides presents in the dewatered mine, once the area is open to free oxygen and light, will be processed when the formally stable sulfides are converted to a water-soluble form.

Ind 151-3

The EIR for a mine is required to state the entire list of water components being monitored and how the monitoring will be made ready to ensure continued compliance. There is no mention of the standards required by the Cal-EPA for water test laboratory testing, licensing, and compliance. The Empire proposed a one site licensed laboratory for the testing of discharge water and the publication of monthly compliance reports.

Ind 151-4

The EIR however does make a point of a requirement to comply with the lighting standards of the International Dark Sky Association (IDA) since the mine is located in a rural area. The reviewer is appreciative of this acknowledgement.

Ind 151-5

I was a student in graduate school when I was drafted by my Stanford professor to work on the Empire Mine study in 1968-69. The treatment plan was one of the reasons it was proposed to transport water via a pipeline to an NID plant for mixing demineralized water with ditch water on Brunswick Hill. The apparent cost of reopening the mine was the primary reason Newmont decided to give the land to the state and not reopen the mine.

I worked in semiconductor processing as an engineer, was a design engineer specializing in compression and modulation of digital signal processing and was the US representative to the UN ITU-R (International Telephone Union) in Geneva during the Clinton-Obama administrations and I am now retired.

Daun Langston
21790 McDaniel Rd
Big Oak Valley, CA 95977
530-263-9293

INDIVIDUAL LETTER 151: DAUN LANGSTON

Response to Comment Ind 151-1

The commenter implies that the project will not be able to comply with regulatory requirements regarding temperature of discharged water from the mine dewatering. However, the project is able to and will be required to comply with the regulatory requirements for mine water discharge. Please see Master Response 32 – Temperature of Mine Water Discharge, and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 151-2

The commenter asserts that the DEIR did not adequately analyze realgar, a sulfide of arsenic, which is asserted to be of concern at the Empire Mine. The 1969 study referenced by the commenter is not provided or available for review and therefore no comment can be provided on this study. The mineral realgar is not mentioned in published geological studies of the Empire Mine nor any other mines in the Grass Valley area (see page 36, The Gold Quartz Veins of Grass Valley, Johnson USGS 1940). Arsenic is noted to occur in arsenopyrite in the Empire Mine and certain other mines, but was rarely observed in the Grass Valley area. Arsenopyrite was noted to be more common in the Nevada City area. The proposed water treatment plant is capable of treating arsenic in water and the Empire Mine is currently discharging treated mine water using a similar water treatment method (aeration and oxidation). Please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 151-3

The commenter asserts that the DEIR's water treatment plan is required to provide more information on how sulfides will be treated. The DEIR discusses metal sulfides and water treatment constituents and requirements in detail. Please see sections 4.8 and Appendices K.2 and K.4 of the DEIR. Also see Master Response 35 – Discharge to South Fork Wolf Creek. The design and function of the proposed water treatment plant was analyzed by the County's independent consultants, who concluded that the water treatment plant would be capable of treating the water produced from dewatering to regulatory standards for water quality. The commenter requests more information on treatment of water and specifically sulfides of arsenic; however, adequate information is provided in order to assess the environmental impacts of the project, and engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 151-4

The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Ind 151-5

The commenter provides background on the Empire Mine proposed reopening and the commenter's professional background. Comment noted.

Individual Letter 152

RECEIVED
MAR 09 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1

To: Nevada County Board of Supervisors
From: Dave and Dianna Connell
Regarding: Idaho-Maryland Mine

If you were building a new home, would you give that job to a contractor of questionable character? A company that went bankrupt with court cases continuing? The obvious answer is "No Way!" Yet here we are with Rise Gold wanting to reopen and work the Idaho-Maryland Mine for 80 years! This contractor is on shaky ground (literally and figuratively).
We are definitely opposed to this mine reopening under any circumstances. There are many questionable issues surrounding the reopening of the mine for which we have concerns: noise pollution, air pollution, wells being depleted, dump trucks running 24/7, employment promises that are highly suspect, and a deceptive company running the show. Sounds like a recipe for disaster! Let's avoid this one!

Ind 152-1

David L. Connell 12764 Butterfly Dr.
Dianna L. Connell N-City
Barbara La Plante 13000 Redwood Place
NO MINE!!
Carol Arnold 12927 Butterfly Drive N.C.
NO MINE! NO MINE

INDIVIDUAL LETTER 152: DAVE AND DIANNA CONNELL

Response to Comment Ind 152-1

Please see Master Responses 1 and 3.

Individual Letter 153

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also support an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

No Way!

Name(s) Dave + Renae Erickson

Address POB 74 Chicago Park, Ca ZIP 95712

Phone

Email Address

Ind 153-1

INDIVIDUAL LETTER 153: DAVE AND RENAE ERICKSEN

Response to Comment Ind 153-1

Please see Master Response 1.

Individual Letter 154

From: david taylor
To: Idaho MMEIR
Subject: Mine
Date: Thursday, February 17, 2022 8:46:42 AM

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Ind 154-1

No mine we need to have water

Dave

INDIVIDUAL LETTER 154: DAVE TAYLOR

Response to Comment Ind 154-1

Please see Master Response 1.

Individual Letter 155

From: David Agran <david@agranconsulting.com>
Sent: Wednesday, March 30, 2022 5:37 AM
To: 'David Agran'
Cc: Idaho MMEIR; Planning
Subject: Agran - Banner Mtn 13 year resident and WELL owner - Concerns for further study in EIR of Rise Gold Folly

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Dear Mr. Kelley

I would like to officially submit my concerns to the DEIR Process – and ask for further study as part of the Rise Gold (folly),

Ind 155-1 I own a single family home on 13755 Quaker Hill Cross Road (closest intersection Crystal Wells). It is a single family home with a well. I have been in residence for 13 years. On initial inspection the well was low producing at 3gpm. Anecdotally, I believe that my well is more tenuous than it was 13 years ago. My house is near the top of Banner Mtn at an elevation of 3600 '. The edges of the East boundary of the Mineral rights are around 3 miles from my property at an elevation of roughly 3000'. Water flows downhill, I have significant concern that dewatering the mine of millions of gallons of water and then maintaining a dry mining environment for the next 85 years, will potentially significantly decrease the longterm sustainability of my well and all of the wells in the vicinity. I do realize lots of studies have been conducted.... BUT WHAT IF THEY ARE WRONG??? How will the Board of supervisors protect us, the community members they are elected to serve if their data, and assumptions and all of the unknowns and uncertainties of this kind of analysis and assessment is WRONG. (It is even more troubling given the legal problems, pollution problems that Rise Gold and its current management are facing in Canada... there are serious impact going on with our Northern neighbors on their last project...so clear proof that "Someone was wrong" and "and something seriously went wrong" (and that poor community is now dealing with the aftermath... don't let that be us.).

Ind 155-2 This is especially dire given the very real impacts that Climate Change is having, and will continue to have on an escalating basis over the next 85 years as the duration of this permit allows.

There are many other areas where the significant impacts of reopening Rise Gold are pure folly, but I will address my comments to those that immediately affect me as a homeowner and citizen reliant on my functioning well for life and sustainance. **Chapter 4.8 Hydrology and Water Quality Report**

Ind 155-3 I was startled to read on Regional Groundwater Occurrence page 8, where The EMKO study showed Well draw downs in a 1-2 mile area.... This permit is for 85 years. Further study considering those at higher elevations on Banner Mtn must be studied. Also well mitigation plans need to be put in place for all those wells that may be impacted over an 85 year permit duration. Water flows downhill, there are 72.8 miles of tunneling (pg 17), and no assurances that other abandoned tunnels from other mines may not also be impacted by the dewatering.
Sustainable groundwater preservation act (page 32)

Ind 155-4 As written in the
Nevada County General Plan

Mineral Management (Pg 35)
Goal 17.1
Policy 17.24 Regardless of the General Plan designation, subsurface mining shall be conditionally permitted throughout the County. **Said mining shall be allowed only after impacts on the environment and affected surface land uses have been adequately reviewed and found to be in compliance with CEQA. Of particular importance shall be the impact of the operation on surface land uses, water quantity and quality, noise and vibration, land subsidence, and traffic associated with surface access. All other related impacts shall also be addressed.**

Ind 155-5 Water and sustainably producing wells of existing homeowners is prime. Rise Golds needs are subservient to this right, and should be clearly mitigated by the County and Rise Gold for the entire 85 years of this permit duration.

Ind 155-6 **Predictive Simulations (p.38).** Where it is possibly useful assessing historical data going back to 1956 when the IM Mine stopped operations, I do not see any predictive assumptions made or studied that include the realities of Climate change. Our county is dryer, hotter, less snow, more fire danger, more drought- less water secure than at the turn of the 1900's and in 1956. All of this affects our groundwater and wells. Studies that accurately factor in the real and escalating effects of Climate change should be studied.

Ind 155-7 **Where the mining scenario is for 25 years. The permit is for 85 years. They may not be mining in year 86, but my house will still be standing and will require a sustainable well. Rise Gold and the County must have an ironclad guarantee that the community's water supply is protected**

Ind 155-8 **P 55)** Thus, the water level within the mine workings would eventually decrease as much as 3,200 feet due to the project.

What impact does this have on the wells at higher elevations and near their boundaries? What if their assumptions, and science is wrong…? and the mine adversely affects our wells? How is the community protected by the county and insured by Rise Gold of this very real possibility. We are at the top of the mountain, appropriate study on well impacts beyond their mineral rights is the responsible thing to do.

Ind 155-9 **P 62** It is also noted that public concerns have been expressed regarding a scenario in which mining operations encounter a fractured bedrock aquifer and drain out the water, thus, impacting groundwater supply wells. Fractures or geologic discontinuities decrease with depth due to the weight of overlying geologic materials. The mining would occur in the deeper geologic units where the fractures, if present, are closed or have smaller apertures, which would not transmit significant quantities of water. The scenarios addressed in the Itasca modeling cover a wide range of probable situations that may be encountered and the potential impacts to groundwater levels.

How do we know this is true, if studies considering the higher elevation of Banner Mountain wells is not being considered?

Ind 155-10 Pg 66 the applicant has prepared a Well Mitigation Plan (February 2, 2021) that would connect up to 30 properties in the East Bennett area to the NID potable water system. The properties would have the option to be connected to the potable water system prior to commencement of initial mine dewatering. The Well Mitigation Plan will obligate the applicant to fund the engineering, permitting, construction, and installation of main water piping and water meters to each property, as well as NID water charges for ongoing water supply.

2

If the folly of Rise Gold is allowed to continue, this well mitigation needs to be expanded and protected for all community members so impacted by Rise Gold dewatering (so that declaring bankruptcy which allows them to walk away and the homeowners and county left holding the dry-well fetid bag can NOT happen.

Ind 155-11

And I am not even touching upon the pollution counter to the county's Green goals, the noise and traffic and air pollution around brunswick basin, or the risks to the habitat and water resources near and below the mind. Mining was part of our historical facts (which we are still cleaning up), but should NOT be part of our glorious future.

Thank you Mr. Kelley for your attention to this very real issue. Water is life, don't allow Rise Gold take advantage of the community so they can get filthy rich and leave behind us to deal with the filth

Ind 155-12

Respectfully submitted,

David Agran M.Ed BCC
Banner Mountain
13755 Quaker Hill Cross Road
Unincorporated Nevada County
davidagran@gmail.com
760 310 6869

INDIVIDUAL LETTER 155: DAVID AGRAN

Response to Comment Ind 155-1
The commenter is concerned that the project's dewatering of the Idaho-Maryland Mine could negatively impact private wells and is concerned about the ramifications if the technical studies are wrong. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Please also see Master Response 3 – Operator Responsibility.

Response to Comment Ind 155-2
Please see Master Response 16 - Drought and Climate Change.

Response to Comment Ind 155-3
The commenter requests further study of well drawdown considering higher elevations at Banner Mountain. However, no groundwater drawdown is predicted in this area as shown on Sheet 12 of Appendix K.2 to the DEIR. The commenter is referred to Chapter 4.8 and Appendices K.2 and K.3 of the DEIR. The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Sheet 16 attached to the Final EIR as Appendix L.

Response to Comment Ind 155-4
The commenter provides an excerpt of the Nevada County general Plan. Consistent with the referenced General Plan policy (Policy 17.24), the impacts on the environment and affected surface land uses have been adequately reviewed in the DEIR. As noted in Policy 17.24, of particular importance shall be the impact of the operation on surface land uses (see Chapters 4.4 (Biological Resources) and 4.5 (Cultural and Tribal Cultural Resources)), water quantity and quality (see Chapter 4.8, Hydrology and Water Quality, and Master Response 15 – Adequacy of Groundwater Monitoring Wells), noise and vibration (see Chapter 4.10, Noise and Vibration), land subsidence (see Chapter 4.6, Geology, Soils, and Mineral Resources), and traffic associated with surface access (see Chapter 4.12, Transportation and Circulation).

Response to Comment Ind 155-5
The commenter states that the Project Applicant should mitigate for any groundwater impacts for the life of the project but does not state how the DEIR is inadequate. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 155-6
The commenter questions the utility of historical data from the Idaho-Maryland Mine in light of climate change but does not state how the DEIR is inadequate. The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 155-7
The commenter states that the DEIR should analyze impacts to groundwater wells over the life of the project rather than 25 years. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 155-8
The commenter asks about groundwater level impacts at higher elevations and near the mineral rights boundaries. The commenter is also referred to Master Response 7 – Location of Future

Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Sheet 16 attached to the Final EIR as Appendix L.

Response to Comment Ind 155-9

The commenter requests further study of well drawdown considering higher elevations at Banner Mountain. However, no groundwater drawdown is predicted in this area as shown on Sheet 12 of Appendix K.2. The commenter is referred to Sheet 12 of Appendix K.2 and Chapter 4.8 and Appendices K.2 and K.3 of the DEIR. The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Sheet 16 attached to the Final EIR as Appendix L.

Response to Comment 112-10

The commenter states that the DEIR underestimates the number of private wells potentially impacted by the project but does not state how the DEIR is inadequate. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. In addition, please see Appendix D to this Final EIR for an updated Well Mitigation Plan.

Response to Comment Ind 155-11

The commenter states that gold mining is part of the County's past and not its future. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, regarding their generally expressed concerns.

Response to Comment Ind 155-12

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 156

From: David Agran
To: bdofsupervisors
Subject: I DO NOT Support our community taking the SIGNIFICANT RISKS of Opening Rise Gold... bad idea any way you slice it.
Date: Saturday, March 19, 2022 10:05:05 PM

Dist 1

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Honorable County Supervisors,

I am deeply concerned by the movement to open the significantly risky Rise Gold Mine. Nevada City and Nevada County has had a glorious history as a Gold Mining Community... That is our past. IT IS PURE FOLLY to consider it as our Future. Why???

Ind 156-1

1. How can we TRUST the Rise Gold Corporation and certainly not its Principle snake oil salesman corporate executives. They will certainly make millions off of Rise Gold... if not from the gold, than from the capitol investors, they are already reeling in... and if they aren't, they declare bankruptcy and move on as they did in Canada, leaving behind the mess and clean up and no resources to put things right.... They get all the benefit, the community takes on all the risk... How does anyone or group or community or county protect themselves from the downside of a decades and decades long project, with tons of uncertainty, plus the challenges compounding by drought and climate change and being in an area where WATER is essential for survival, in short supply, and getting scarcer. Most importantly, there is no easy Plan B for us holding the bag. One needs water to live. Of course they want to make mega millions.... But their risk is minimal... the long term – decades and decades and decades and decades of risk we the community take -- is forever.

Ind 156-2

How does one trust them?:

- The press releases, and spin and marketing for raising money whether espousing the results from the EIR, or the NID meeting, or their paid consultant reports, or their severely limited poll of 500 people(that didn't even include people around the mine site), shares all the great news that supports their position, but leaves out the significant questions (i.e. concerns raised by NID), and the concerns and limitations and questions raised by the EIR, especially those areas requiring more study. If they are already stretching the truth, and showing their mastery of spin...how can we trust them, now and certainly into the future. God forbid some chemical spill or pollutant leak or other catastrophe strikes, how can we trust them that they will act ethically and tell the truth and clean up their messes.... They haven't shown that proclivity in the past, or now, once they are green lit, why should they in the future.
- How can we trust them... a Canadian company, set up in Nevada (to avoid the more stringent oversight of CA law), with pollution and catastrophe and litigation and

massive clean-up in Canada from their last project... where they just declared bankruptcy and they walk away leaving the community to deal with their mess. (It is a strategy that worked for them in Canada, why not in Nevada County. If the Rosy projections fall short or when "the ohh shits" happen they just pack up and move on.

- Or they sell out their interests and move on, leaving a new owner /operator to deal with it and one where the county does not have the fail safes and contractual obligations as they did with the original permit holders.
- How does the county protect themselves and our communities and our water and our environment if they do that. They reap the rewards and we take on all the risk.
- How can we trust them when so much is at stake if anything goes wrong.

2. Water is a scarce and precious commodity, which only is getting scarcer with the uncertainty's of climate change.

- I live on the top of Banner Mtn. I have a low producing well, that has degraded further during the 13 years I have been here. If they drain out millions of gallons of water below me.... The simple laws of gravity kick in and my well becomes less producing... How am I protected and all the other well owners sitting adjacent and above their mineshafts from this potential eventuality... what if it takes 10 years for that to happen given geologic faults and cracks etc... Yes their hydrologists report said it wont impact me and my well... BUT WHAT IF THEY ARE WRONG, what if their assumptions are wrong, what if their science is wrong, what if their data analysis is wrong. How do you our sworn elected officials protect us from that? I do not have an NID pipe underground along Quaker Hill Cross Road that I can easily tap into ... I am screwed!... I'm selling my property at a massive loss, spending thousands on a water tank and thousands more to have water trucked and delivered to my house weekly for basic survival needs.

Ind 156-3

- Even inconsistencies from the 25 year old EIR study for Emgold said 100 wells could be impacted... Current EIR claims only 7 or maybe 30... WHAT IF THEY ARE WRONG. And in the 90's Climate change and our perpetual droughts and fires were not even on anyones radar. Please actively consult and work with NID... to get their honest take on what could go wrong and how to mitigate for it if that is even possible.

Ind 156-4

- Other than the scarcity of water, there is a huge concern of arsenic and other heavy metals leaching out and spoiling our wells, our streams our hapitat

Ind 156-5

- Gold sure is bright and shiny and makes you rich, but you sure cant drink it, or bath in it, or put forest fires out with it.....

Ind 156-6

- Your decision literally effects people's LIVES. Physical and economic

Ind 156-7

- Please consider the economic loss of people who have saved for decades buying their most precious asset... their homes, their houses, the roof over their families heads... what happens to the value of those houses if their wells run dry or get contaminated, and NID is not an option??? Economic ruin. How do you protect us from that risk... even looking out the decades that this permit will allow.

Ind 156-8

I don't live adjoining the mineral rights, or along that part of the county that will see the real impacts of noise, traffic, pollution... regardless what they say -- their industrial waste, their cement processing, their gold mining processing, their trucks will have a significant visual, noise, air and water impacts on the community for miles around, and everyone who is frequenting the shops in

Ind 156-9

Brunswick basin. Doesn't The County have longterm Green goals in place for our county?... It seems like Rise Gold sets those back significantly.

Ind 156-10

Please consider what the elected officials of NC and GV think also, we are a collective community. This is too big a community wide, county wide issue to have the voices of only 5 people make this decision. Please listen to the positions of our elected city officials, and the professional, hired City leaders and managers on these impacts.

I know the potential jobs and tax revenue must leave County Supervisors salivating at the possibilities – but you please can not pimp out the community and risk the health and safety and longevity of our community to decades of pollution, dry wells, economic and environmental risk and uncertainty.....

Ind 156-11

And if your common sense is on the wane and you decide to support this Ponzi scheme folly... I hope you are smart enough to protect our interests, our longterm health and water and community for decades into the future. Maybe a security bond of hundreds of millions funded before they start mining, solid contracts protecting and insuring everyone's water supplies for a hundred years into the future, maybe profit sharing on the resources to compensate all the county residents (Similar to the checks every Alaskan resident gets every year)???

If the community is going to suffer the calamity, please make sure that Rise Gold is fully protecting and compensating the community for the pillage, and mitigating ALL the RISKS decades into the future so we are not left holding the fetid, rotten bag... as they drive out of town with millions in the bank and not a care in the world.

Sincerely and respectfully submitted,

David Agran M.ED BCC
13755 Quaker hill Cross Road (Banner Mtn)
Nevada City
760 310 6869

INDIVIDUAL LETTER 156: DAVID AGRAN

Response to Comment Ind 156-1
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter also references the Project Applicant's reputation. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 155-2
The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 155-3
Please see Response to Comment Ind 155-1.

Response to Comment 155-4
The commenter references a prior draft Environmental Impact Report for the Idaho-Maryland Mine. The commenter is referred to Responses to Nevada Irrigation District Comment Letter Agcy 10, Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 155-5
The commenter is concerned that the project will contaminate groundwater wells with arsenic and other heavy metals. Because the mining activities will only lead to the drawdown of groundwater and thus not provide recharge to the domestic wells, the mining activities at the project site should not affect the water quality of the domestic wells. The commenter is referred to DEIR Appendix K.8, page 14.

Response to Comment Ind 155-6
This comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers.

Response to Comment Ind 155-7
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 155-8
The commenter is concerned about the project's potentially negative impacts to property values and private wells. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Regarding impacts to property values, the commenter is also referred to Master Response 2 - Social and Economic Impacts. Regarding impacts to private wells, the commenter is referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 155-9
The commenter is concerned about impacts top aesthetics, noise, air quality, and hydrology but does not comment on the adequacy of the DEIR. The commenter is referred to Master Response

1 and DEIR Chapters 4.1 (Aesthetics), 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.8 (Hydrology and Water Quality), and 4.10 (Noise and Vibration).

Response to Comment Ind 155-10

The comment does not address the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 155-11

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Individual Letter 157

Dist 1

15 MARCH 2022
DAVID T. BOWMAN 16463 TERRA RAX PL.
GRASS VALLEY, CA 95945-9354
REGISTERED VOTER PROPERTY OWNER
TAX PAYER RESIDENT SINCE 1969
RET. N.C. ELEM. TEACHER

MATT KELLEY SENIOR PLANNER
NEVADA COUNTY PLANNING DEPT.
950 MAIDU AVE. SUITE 170
NEVADA CITY, CA 95959-7902

RE: LETTER IN OPPOSITION TO THE ISSUEING OF A PERMIT TO REOPEN THE IDAHO-MARYLAND MINE; MY COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT.

MY OPPOSITION IN PART IS BASED ON:

Ind 157-1 1.) THE EIR's INADEQUITE AND INSUFFICIENT KNOWLEDGE OF THE HYDROLOGY OF THE MOVEMENT, SEDIMENTATION OF NATURAL OCCURING, PREVIOUS AND PURPOSED MINERALS; WATER QUALITY IN THE DEWATERING'S HUGH VOLUME 24/7!

Ind 157-2 2.) THE EIR'S UNSPECIFIED MOVEMENT AND PLACEMENT AND TOXCITY OF SURFACE AND SUBSORFACE AGGREGATE BY TRUCKS OVER ALREADY INADEQUETE ROADS TO SITES IN AND OUT OF THE COUNTY - TRAFFIC IMPACT.

Ind 157-3 3.) THE EIR'S DISREGARD FOR A THOROUGH EVALUATION OF THE IDAHO - MARYLAND BRUNSWICK, NEWBRUNSWICK MINE SITES AS HAZARDOUS MATERIAL SITES"... WITH THE INTERCONNECTEDNESS OF ALL THE MAJOR MINE DRIFT SHAFTS AND THE PROXIMITY OF THE SUPER FUND SITE - THE BANNER LAVA CAP MINE, TOXCITY IS A MAJOR FACTOR IN RELATION TO STATE STANDARDS FOR PEOPLE, FLORA + FAUNA FOR H_2O QUALITY!

Ind 157-4 4.) THE EIR'S REQUEST FOR AN 80 YEAR OPERATEING PERMIT IS OUTRIGHT TOO LONG! TO COMMIT THE ENTIRE COMMUNITY, PRESENT AND FUTURE, TO 80yrs. by FLUE, HOWEVER WELL MEANING; LIMITED KNOWLEDGE OF AIR, WATER AND KNOWLEDGE ON MINING DEMINERALIZATION CHEMICAL TECHNIQUES; BASED ON AN EIR PREPARED BY THE APPLICANTS IS NOT IN THE BEST INTEREST OF THE ENTIRE CITIZEN COMMUNITY! THE DEMOCRACTIC PROCESS IS BEST SERVED WHEN THE COMMUNITY OF VOTERS CAN VOTE ON THE ISSUE OF SUCH IMPACT AND IMPORTANCE.

Sincerely, David T. Bowman

EACH SUPERVISOR RECD

RECEIVED
MAR 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

C.C. SUPERVISORS (5)
M.I.N.C. W/ATCH. N.C. ORG.

INDIVIDUAL LETTER 157: DAVID BOWMAN

Response to Comment Ind 157-1
Please see Chapter 4.8, Hydrology and Water Quality, of the DEIR in regard to potential impacts to hydrological resources.

Response to Comment Ind 157-2
Please see Chapter 4.12, Transportation, of the DEIR in regard to potential traffic impacts related to aggregate hauling.

Response to Comment Ind 157-3
Please see Master Response 4.

Response to Comment Ind 157-4
Please see Master Response 1.

Individual Letter 158

15 MARCH 2022
DAVID T. BOWMAN 16463 TERRAPIN PL.
GRASS VALLEY, CA 95945-9354
REGISTARED VOTER PROPERTY OWNER
TAX PAYER RESIDENT SINCE 1969
RET. N.C. ELEM. TEACHER

MATT KELLEY SENIOR PLANNER
NEVADA COUNTY PLANNING DEPT.
950 MAIDU AVE. SUITE 170
NEVADA CITY, CA 95959-7902

RE: LETTER IN OPPOSITION TO THE ISSUEING OF A PERMIT TO REOPEN THE IDAHO-MARYLAND MINE; MY COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT.

MY OPPOSITION IN PART IS BASED ON:

Ind 158-1 1.) THE EIR's INADEQUITE AND INSUFFICIENT KNOWLEDGE OF THE HYDROLOGY OF THE MOVEMENT, SEDIMENTATION OF NATURAL OCCURING, PREVIOUS AND PURPOSED MINERALS, WATER QUALITY IN THE DEWATERING'S HUGH VOLUME 24/7!

Ind 158-2 2.) THE EIR'S UNSPECIFIED MOVEMENT AND PLACEMENT AND TOXCITY OF SURFACE AND SUBSURFACE AGGREGATE BY TRUCKS OVER ALREADY INADEQUETE ROADS TO SITES IN AND OUT OF THE COUNTY-TRAFFIC IMPACT.

Ind 158-3 3.) THE EIR'S DISREGARD FOR A THOROUGH EVALUATION OF THE IDAHO-MARYLAND, BRUNSWICK, NEWBRUNSWICK MINE SITES AS HAZARDOUS MATERIAL SITES"... WITH THE INTERCONNECTEDNESS OF ALL THE MAJOR MINE DRIFT SHAFTS AND THE PROXIMITY OF THE SUPER FUND SITE-THE BANNER LAVA CAP MINE, TOXCITY IS A MAJOR FACTOR IN RELATION TO STATE STANDARDS FOR PEOPLE, FLORA & FAUNA FOR H_2O QUALITY!

Ind 158-4 4.) THE EIR'S REQUEST FOR AN 80 YEAR OPERATEING PERMIT IS OUTRIGHT TOO LONG! TO COMMIT THE ENTIRE COMMUNITY, PRESENT AND FUTURE, TO 80yrs. by FLUE, HOWEVER WELL MEANING; LIMITED KNOWLEDGE OF AIR, WATER AND KNOWLEDGE ON MINING DEMINERALIZATION CHEMICAL TECHNIQUES; BASED ON AN EIR PREPARED BY THE APPLICANTS IS NOT IN THE BEST INTEREST OF THE ENTIRE CITIZEN COMMUNITY! THE DEMOCRACTIC PROCESS IS BEST SERVED WHEN THE COMMUNITY OF VOTERS CAN VOTE ON THE ISSUE OF SUCH IMPACT AND IMPORTANCE.

Sincerely, David T. Bowman

RECEIVED
MAR 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

C.C. Supervisors (5)
MINE WATCH. N.C. ORG.

INDIVIDUAL LETTER 158: DAVID BOWMAN

Response to Comment Ind 158-1
Please see Chapter 4.8, Hydrology and Water Quality, of the DEIR in regard to potential impacts to hydrological resources.

Response to Comment Ind 158-2
Please see Chapter 4.12, Transportation, of the DEIR in regard to potential traffic impacts related to aggregate hauling.

Response to Comment Ind 158-3
Please see Master Response 4.

Response to Comment Ind 158-4
Please see Master Response 1.

Individual Letter 159

From: David Costa
To: bdofsupervisors
Subject: Rise Gold Mine
Date: Thursday, February 17, 2022 2:41:20 PM

Dist 3

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Ind 159-1

I am absolutely opposed to the opening of Rise Mine in Nevada county. I am a voter of this county since 1979. I have paid property taxes and sales tax here all these years. I believe the mine opening will harm our air quality as well as our traffic and water quality. Water is a precious resource and should not be used on mining in this county. Sincerely

David R Costa
230 Horizon Circle
Grass Valley, Ca 95945

Sent from Mail for Windows

INDIVIDUAL LETTER 159: DAVID COSTA

Response to Comment Ind 159-1

Please see Master Response 1.

Individual Letter 160

From: David Figuly <dfiguly@gmail.com>
Sent: Sunday, April 3, 2022 7:42 PM
To: Matt Kelley
Subject: No Mine

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Matt Kelley, Senior Planner April 2, 2022
950 Maidu Ave, Suite 170
Nevada City, CA 95959

I live on Cedar Ridge near the Idaho Maryland Mine. I have lived in this neighborhood about 20 years and we are raising our family here.

Ind 160-1 I believe after reading a great deal of the DEIR that No Project would be the best decision the Board of Supervisors could vote for. The report stated on page 2-7

"Based on the preceding alternatives analysis, the No Project (No Build) Alternative would be the environmentally superior alternative. "

But if the Board decides to consider points that discuss the possible re-opening, then please also consider not authorizing the building variance.

Ind 160-2 The Planning Department's Project Description included this statement:

"the project would also include the following entitlements: Variance to the Building Height Limits to allow for the construction of several structures up to a height of 165 feet, where 45 feet is the maximum height limit allowed pursuant to the Light Industrial Zoning District." (Nevada County LUDC, Section L-II 2.5 – Industrial Uses, Table L-II 2.5.E).

I think on this request - to not follow the rules already in place and receive variance that is so much greater than the maximum height limit - is another reason not approve the re-opening of the mine.

Ind 160-3 The mining operation regardless of how it is described is not a "light industrial" business.

The county defines M1 (light industry) code as:

The M1 District provides areas for the production, repairing, distribution, and warehousing of goods and equipment, along with supporting businesses and services. Uses should provide for buffering from adjacent land uses to minimize incompatibility and should have convenient, controlled access to arterial or major collector roads without passing through residential areas.

A gold mine in the middle of a residential area is NOT compatible with the current adjacent land uses. Before the mine closed in 1956, the number of people in the area were far fewer and much less was known about the short and long term consequences of this type of mining on water, the habitat, noise, air pollution, traffic, to identify a few. But luckily, we have learned a lot about the pros and cons of hard rock mining.

Blasting new tunnels will disturb the surrounding neighborhood, similar to the what happened when Rise's test drilling created noise and vibrations which disturbed many of the residents on Bennett and nearby homes. The residents finally had to convince the powers to be to make RISE stop the blasting overnight so they could sleep. A resident on Bennett published a letter to the Union (August 25, 2020) about the disruptive vibrations during the exploratory drilling. Rise proposes to blast 24/7 in a larger area. I don't understand how blasting and then removing 1000 ton of rock each day is light industry.

The mining operation is not engaging in production, repairing, distribution or warehousing of goods and equipment. US Legal (https://definitions.uslegal.com/l/light- industry/) describes

1

"light manufacturing activity that uses moderate amounts of partially processed materials to produce items of relatively high value per unit weight. Light industries require only a small amount of raw materials, area and power. The value of the goods produced is relatively low and they are easy to transport. Light industries cause relatively little pollution when compared to heavy industries. As light industry facilities have less environmental impact than those associated with heavy industry zoning laws permit light industry near residential areas. It is a criterion for zoning classification. The manufacturing of clothes, shoes, furniture, consumer electronics and household items are a few examples of light industries."

Certainly, this does not describe a full-scale mining operation.

The mining operation will be processing tons of rock daily, crushing and hauling it to its Centennial Site for a few years and then the waste rock will collect it at Brunswick until it can be hauled to contractors to use it elsewhere in the county and state. This "distribution" is daily for 50-plus round trips by heavy trucks that will haul the waste tailings, 1000 tons daily for years and years. These trucks will be passing through residential areas. Heavy polluting trucks will also haul the waste rock to highway 49 or down 174 for further transport to other parts of the region and state. The noise, dust and exhaust will affect the citizens' quality of life in the county and surrounding region. This type of "distribution" is not the delivery of newly assembled items from light industry, its characteristic of a heavy industry.

To break apart the ore which may or may not contain gold, requires that rock be crushed (stamped) and possible findings be removed and sent on for processing. To do this, buildings will be built that are nearly 4 times taller than what is allowed in a "light Industrial" M1 zone.

Table 4.11-2 Building Summary provides the height of proposed structures:

Headframe max height 165 feet
Hoist Building 50 feet
Process Plant 64 feet
Shaft Service
Headframe in shaft building 80 feet
Hoist 50 feet

These would not be compatible with the surrounding land use that is mostly residential and a very few commercial buildings that are mostly 1 story. The current 65-foot shaft is an eye-sore that is already 20 feet higher than what is currently allowed. The proposed headframe is 2.5 times taller than the current out of compliance shaft. It would be almost 4 times taller than what the current regulations allow. The proposal also asks for a hoist building allowance of 50 feet AND a process plant 64 feet in height, 19 feet too tall.

Highway 174 to Brunswick is a major gateway into Grass Valley. It is not designated as "scenic" but it is attractive as residents and tourist approach and enter the city. The noise, the dust, the diesel fumes from the mining operation and the too tall structures would create a negative impact on the traveler. As a resident of the area, these are not acceptable trade-offs. The mine "wins" and we get to breath dust, fumes, diesel particulate matter and see the out of compliance structures as we wait in more traffic. These are NOT acceptable variances in a M1 Light industrial zone.

The DEIR states: "The Brunswick Industrial Site is currently zoned Light Industrial (M1) with Site Performance Combining District (SP). Implementation of the project would include rezoning the Brunswick Industrial Site to Light Industrial with Mineral Extraction Combining District (M1-ME). The primary purpose of the Mineral Extraction Combining District is to inform the public of the potential for mineral extraction. However, the base zoning district of M1 would remain unchanged." (4.3-72 pdf 364)

The mining operation is clearly not a light Industrial company. It is an industry that does NOT meet the definition or intent of the policy of establishing a light industry project. Rezoning it with ME (mineral extraction) added doesn't work because the industry is not truly a M1 project.

I don't think the rezoning is so the public is better informed about "the potential of mineral extraction, it is because without the rezoning the mining operation can't occur.

The rezoning of M1 - light industrial to M1-ME does not support the county policy of what M1 is and what kind of activities should and should not occur on the site.

Respectfully,
David Figuly
Cedar Ridge, CA

2

INDIVIDUAL LETTER 160: DAVID FIGULY

Response to Comment Ind 160-1

The commenter urges the County to adopt the "No Project" alternative. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 160-2

The commenter requests that the County reject the height limit variance for the project's structures. The commenter's request is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 160-3

The commenter offers their opinion of what should be allowed in M1 light industrial zoning. However, as discussed on page 4.9-16 of the DEIR, subsurface mining is allowed in all base districts, including the M1 base district, subject to approval of a Use Permit. Surface mining is allowed in the M1 base district and where the property is zoned ME. The commenter also states that the project is not compatible with adjacent residential land uses. The project's effects on the nearest residences are evaluated throughout the technical chapters of the DEIR. The comment is noted for the decisionmakers.

The commenter states that the project will result in adverse impacts to water, habitat, noise, air pollution, and traffic but offers no additional information on which to formulate a response. The commenter is referred to DEIR Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.4 (Biological Resources), 4.8 (Hydrology and Water Quality), 4.10 (Noise and Vibration), and 4.12 (Transportation and Circulation).

The commenter states that underground blasting will disturb the surrounding community. The DEIR concludes that noise- and vibration-related impacts from blasting would be less than significant (DEIR, p. 4.10-38, 51.) The commenter also states that blasting would occur 24 hours a day, 7 days a week. The DEIR states that blasting activities are proposed to take place twice daily with blasting between shifts at 7AM and 7PM with 3 to 4 drift rounds blasted every 12 hours between shift changes and longhole blasts of approximately 3,300 tons of rock taking place once every 3-4 days. (DEIR, p. 4.7-28.) The commenter states that the applicant previously disturbed the surrounding neighborhood with overnight blasting. However, no such previous blasting has taken place.

The commenter's concerns regarding aesthetics are noted. Chapter 4.1, Aesthetics, Impact 4.1-2, of the DEIR evaluates the effects of the project's structures on the visual character or quality of the site and its surroundings as viewed from public viewpoints. Based on the photographic simulations prepared for the project, the DEIR concludes that the proposed project would substantially degrade the visual character or quality of the site and its surroundings, and while the DEIR includes mitigation to address the impact to the extent feasible, the project's aesthetic impacts would remain significant and unavoidable. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 161

4/4/22, 10:29 AM (45 unread) - davidmgeorge@att.net - AT&T Yahoo Mail

Failure Notice 2 Yahoo/Inbox

MAILER-DAEMON@yahoo.com <mailer-daemon@ya Mon, Apr 4 at 10:19 AM
To: davidmgeorge@att.net

Sorry, we were unable to deliver your message to the following address.

<MMEIR@co.nevada.ca.us>:
550: permanent failure for one or more recipients (mmeir@co.nevada.ca.us:550 5.4.1 Recipient address rejected: Access denied. AS(201806281) [BL0GCC02FT042.eop-gcc02.pro...)

---------- Forwarded message ----------

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Ind 161-1

I am a 5th generation resident of Nevada County. I realize how significant the mining industry has been to our County. However, I don't feel the impact on wells, air quality, noise and traffic is worth the 200 or so jobs, The reopening of the Idaho-Maryland Mine has the potential to destroy much that makes our area so treasured.

Please DO NOT approve its reopening!!

David M. George

530-272-1101

P O Box 866
Cedar Ridge, CA 95924

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NEVADA COUNTY
PLANNING DEPARTMENT

https://mail.yahoo.com/d/folders/1/messages/63311?activity=uh-mail&.partner=sbc&.intl=us&.lang=en-US&.src=finance&pspid=1183300002 1/1

INDIVIDUAL LETTER 161: DAVID GEORGE

Response to Comment Ind 161-1

Please see Master Response 1.

Individual Letter 162

From: Dave Hardy <hardware1197@gmail.com>
Sent: Wednesday, March 23, 2022 12:39 PM
To: Planning
Subject: Public Comment: Idaho Maryland Mine Project

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David & Victoria Hardy
Bourbon Hill Road
Nevada City, CA 95959

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
PO Box 599002
Nevada City, CA 95959-7902

Dear Commissioners,

I am a retired government employee from a large County in California where I served for about 30 years. I say this having the perspective of managing a large budget of taxpayer funds and making recommendations on public policy to elected officials.

My wife and I wanted to write to you to support you making your objective decisions regarding the Rise Gold Idaho-Maryland Project. Living in Nevada City, we began to see the "No Mine" signs popping up all over the County and as property owners, voters, and citizens we decided to research the issue thinking it was a ballot measure or similar and wanted to be informed.

We looked into the project objectively and it seemed to have the potential for significant impact on our County both good and bad. As we tried to do this research we kept slamming into some outrageous and alarming claims from people and the group opposed to the project. As we dug in further, using objective sources, we found these claims are completely exaggerated and downright preposterous and from our perspective were crafted to whip up hysteria.

Ind 162-1

While hopefully our opinion will not matter to you, my wife and I strongly support this project. I say this with all due respect and deference to the science and fact based decision you are making. My research showed a very strong and convincing prospect for significant economic benefits and environmental improvements to our County and that prospect didn't match up with the cult-like opposition and their claims.

I describe it this way because as I discovered the social media side of this discussion, I realized it wasn't a discussion at all. Social media was an echo chamber of alarmism. I was confronted by claims like "We don't know if the mining will cause earthquakes" and "All of our wells will go dry like (insert unrelated project here)" and the "CEO of Rise wants to destroy our land and is a terrible incompetent person." (Some paraphrases).

When I attempted to counter some of these claims publicly with actual evidence and facts, a cult like mob descended on me and my family. I was called names, my right to have an opinion on the subject was questioned, and I was accused of

1

being an employee of the project for even suggesting anything good could come of it. I also discovered a large number of folks feel like we do who contacted me privately for having courage to speak up. They support the economic and environmental benefits of the project but they choose to keep it to themselves for fear of the mob.

Having spoken to folks who live close to the mine site, I have heard their legitimate concerns about oversight and the mitigation measures. They have a legitimate need to be heard. I was disgusted that the concerns of these legitimate stakeholders were being drowned out by false information being peddled in an attempt to drum up hysteria by armchair activists wanting to appear virtuous on social media.

So I put myself in your shoes, where before you even have deliberated on the matter you are publicly accused in social media of taking bribes based on the outcome, and you are threatened with political consequences if you do not bow to the hysteria. Knowing that you must make an objective decision and that you must use facts and evidence to make this decision, I want to tell you you are supported in doing so!

We have read the DEIR, and support the project permits being issued. We are satisfied that the mitigation measures and oversight described in that document will be sufficient to address any risk proposed by this project. We look forward to having a thriving, modern, safe, and clean mining enterprise in our County.

-David and Victoria Hardy

INDIVIDUAL LETTER 162: DAVID AND VICTORIA HARDY

Response to Comment Ind 162-1

Please see Master Response 1.

Individual Letter 163

Section Comment on HYDROLOGY AND WATER QUALITY

Commenter: DAVID HERBST, PhD, stream research scientist

University of California, Sierra Nevada Aquatic Research Lab, UC Santa Barbara and UC Santa Cruz

Representing my own opinion and expertise as a stream scientist expert on acid mine drainage impacts and recovery of stream ecosystems of the Sierra Nevada.

I am a permanent resident of Nevada City as of 2021 (10696 Cement Hill Road)

Background:

Ind 163-1

I have been research scientist with the University of California since 1986, affiliated with the institutions above and hold degrees from Oregon State University and the University of California at Davis. My work as a scientist has been related mostly to the ecology of streams and the influence of a variety of types of disturbance from climate change and drought, to water diversions, sediments, livestock grazing, introduced species, wildfire, and notably the effects of acid mine drainage on stream ecosystems. It is this latter subject that I draw on to inform the comments on the next pages.

Thank you for the opportunity to comment on this DEIR.

This is an important issue to the community and important that we are all given the chance to make comments. This is a highly technical issue and requires deep reading and understanding to really get at the core of potential problems. As such I find it particularly offensive that the proponent RiseGold would send a glossy brochure to the entire community claiming that "the science is clear" and that the "DEIR confirms that the Mine will not...cause water quality or quantity impacts". I disagree. The DEIR is incomplete and naive at best and misleading at worst. As the Planning Commission and County BOS representatives I hope you will be careful and thorough in your review of the real facts or lack thereof.

Ind 163-2

Issue Identified:
Stream hydrology and the augmentation of flows to South Fork Wolf Creek by inputs from the dewatering of the mine

How would the natural flow regime of this stream be affected is the basic concern here. Page 4.4-69 reports an estimate of the flow range for S. Fk. Wolf Crk - showing that adding 5.6 cfs (first 6 months of pumping) would about double the natural peak flow of winter runoff, and far more at other times. The range of natural background flow in this creek is about 0.2 cfs baseflow to 6.5 cfs peak winter runoff (p.466). Winter storm flows were noted by Balance Hydrologics (2020 report) at 11-17 cfs, and claimed that these flows did not generate erosion or sediments. However, this was not accompanied by any quantitative analysis of turbidity or suspended matter transport during the course of this event so it is not possible to actually quantify the potential for erosion with persistent higher flows that are unnatural to this channel. More important is that this does not assess the impact of altered flows on benthic macroinvertebrate populations, the foundation of food webs in streams supporting other aquatic life such as fish, amphibians and riparian wildlife. Data regarding aquatic life is absent and erosion is estimated based on theory rather than observation. Even the long-term dewatering pumping after the initial 6-month period is estimated to be 1.9 cfs and thus would be about twice the flow that is typical of mid-range hydrograph. The flows added by NID to this same water body can be substantial but are periodic and short-term.

Ind 163-3

Action Needed
Significant biological impact assessment needs to consider benthic macroinvertebrates (BMIs) and the organic matter/algae that are the foundation of the food chain in this section of the creek and downstream of the project. The post-project NPDES permit would require BMI biomonitoring but this does not satisfy the need to assess what the effects would be before the project is implemented. At that point it's too late and this is an inadequate measure if damages are already done. Page 472 does indicate the project could have a significant adverse impact (but that it could be mitigated, though again this has not been adequately ascertained for lack of data). These flows are effects that cannot be mitigated. Studies need to be done to determine how the drainage dewatering of the mines could alter what currently lives in the natural stream of S.Fk.Wolf Crk, so these need to be surveyed to evaluate vulnerability to these wastewater discharges. This concerns not only flow alteration, but chemical and metals water quality as expressed in the next issue (below). Such a biological survey of the BMIs should be expressed in terms of the highest taxonomic resolution (genus, species where possible). Detailed data on the aquatic invertebrate community in the South Fork and mainstem of Wolf Creek would be needed simply to set a baseline for whatever happens in the future. Turbidity monitoring, stream gauging and better studies of the distribution of sediments in the channel are also needed.

Ind 163-4

Background
The natural flow regime of mountain streams from winter and spring runoff to summer and fall baseflow are an important sort of clock for the successful timing of life cycles, growth and reproduction of aquatic life. When the natural hydrograph is disrupted, so too are these cycles and the natural processes of streams (Yarnell et al 2010). Erosion and scouring and downstream deposition of sediments can present further problems for organisms living on stream bottoms, another common legacy of hard rock mining.

Relevant References in the DEIR: Section 4.8

Issue Identified
Water quality of discharges and chemical/metals constituents and their toxicity

According to the report, p.466: ***proposed project will discharge a maximum of 5.6 cubic feet per second (cfs) of treated mine water to South Fork Wolf Creek and such discharges will be in compliance with the waste discharge requirements of General Order R5-2016-0076, National Pollutant Discharge Elimination System (NPDES) No. CAG995002 for Tier 3 Dischargers: Discharges of wastewater from hard rock mines.***

Table 12 in the guidance from the State above includes their technology-based effluent limitation for hard rock mining, which may not be as stringent as water quality-based criteria, but in any case, are not appropriate to evaluating the effects of metals on aquatic invertebrates.

Table 4.8-2 concentrations report NO quantitative values for the "after-treatment" proposed discharge water but the amounts of at least Fe and Mn shown for untreated water of the existing shaft are at levels toxic to aquatic life. In Appendix K2 Table 3.6 does give data on different depths sampled in the Brunswick Shaft but these are mostly restricted to values for Fe and Mn, while other metals that can be signifiicant toxic constituents are unreported. Toxicity should be expressed in terms of how it alters the viability of stream life when exposed continuously as in this case. So chronic tests rather than short-term acute testing of mortality (as was done in the case of the trout reported Appendix K2 of the DEIR) are what is needed to evaluate true toxicity. Life cycle exposures should be done with the most sensitive organisms present in the natural stream community.

Regarding the sampling methods used to collect and analyze stream water are not described in enough depth to tell where and in what numbers data was taken. What is the underground architecture of the abandoned mine shafts, how deep and how branched are these shafts? They should be checked thoroughly in case there are pockets with differing contaminant levels.

Ind 163-5

Table 4.8-2, p. 667 (and Appendix K2 Table 3.6) gives the analysis of Tier 3 effluent limits (acute drinking water exposure limits) but these report only single values, or more often not given as a value below the "screening level", and so does not represent the range of value over time and space of the "mine shaft" sampled. The "screening level" appears to be a low sensitivity analysis (cannot find if the analytical instruments used are even specified or their analytical precision). The Table fails to give values below that level and are inadequate for a true quantitative analysis. What's more, these limits have nothing to do with chronic exposures to the aquatic life present in the mine shafts to be dewatered.
Fortunately, in a recently published scientific paper with colleagues we show data bearing on this question that comes from long-term field investigations (Clements et al. 2021). Studying the chronic metals impacts on BMI communities from 4 long-term (20+ yrs) Superfund restoration projects from across the western US (in CA, CO, ID, MT) we found the threshold at which the EPT community (the sensitive mayflies, stoneflies, caddisflies) diversity unravels. This level corresponds to the lab bioassay estimates for chronic exposures producing sublethal damages to growth and reproduction of test organisms, so our field data validated this concentration of combined metals as the limit to the vitality of aquatic life. Importantly these are chronic sublethal effects rather than the acute lethal mortality limits that the trout bioassays used. Those are not how you'd want to evaluate these problems because they are short exposures and look for mortality only instead of the continuous exposures (chronic tests)

that are both realistic and look for how metals/chemistry produce life function impairments. Acute testing is completely inappropriate to assessing the problem. More appropriate to know is that the action of metals toxicity is additive and chronic, so all should be combined as units expressing the total effect-levels rather than individual chemical concentrations. We call these units for each metal/toxicant the criterion continuous concentration CCCs (or aquatic life criteria), and in combination as a sum, the cumulative criterion units (CCUs). Using CCUs recognizes that toxicity is additive and you cannot protect aquatic life only meeting the limits of individual metals since they act together to produce toxicity (as demonstrated in the study cited). At CCU=1 is the limit beyond which sublethal effects produce impaired function and that's exactly what we found in those field studies, so is the best predictor for combined metals toxicity from mines. So, what we need are better data on all the metal constituents as their exact values (and ranges) and how variable these concentrations might be in different shaft compartments.

According to calculations of CCUs, the existing shaft water is toxic (CCU > 5), and after treatment also appears to be toxic but cannot be determined when the screening limits show only "<300" for Fe for example, which at that level alone would exceed CCU=1. So the analysis is inadequate in providing data that is quantitative and sensitive enough in resolution of concentrations of metals, and does not show the variations in the distribution of constituents. As a separate issue the concentration of total ionic solutes (conductivity) is reported at ~400 µS in the existing shaft and no values given for after treatment. This often cannot be controlled by treatment and represents what may be a very high value compared to the background natural level of specific conductance in S. Fk. Wolf Creek which is typically in the range of 50-100 µS (Table 3-8 of Appendix K2). Conductivity of 400 is quite high for Sierra streams and studies have shown it is another factor that can limit BMIs.

Action Needed
Basically the data shown is not sensitive enough and does not even report real numbers for many of the toxic metals. The RWQCB standards for Tier 3 hard rock mine effluent is also negligent in not including many of the toxic constituents from hard rock mines. So we need that data to calculate the CCUs after treatment, and need to validate the method used to determine what those concentrations would be for the treatment proposed. Bottom-line the water quality data needs improvement in detection levels and thorough sampling. Data must also include sulfate concentrations (SO4), acid generating capacity, and acid neutralizing capacity. Seepage from existing or new tailings should be included along with chemical analysis of samples mine shaft compartment waters. Chronic toxicity tests with native organisms should be included with these analyses (not acute tests).

Ind 163-6

Background
There is a long history of the use of aquatic invertebrate communities to assess the extent of damages to resources produced by mine drainage, and recovery of streams undergoing restoration.

Relevant References in the DEIR: Section 4.8 and Appendix K2 (Groundwater Hydrology and Water Quality Analysis)

References Cited:

Clements, W.H., D.B. Herbst, M.I. Hornberger, C.A. Mebane, and T.M. Short. 2021. Long-term monitoring reveals convergent patterns of recovery from mining contamination across 4 western US watersheds. Freshwater Science 40:407-426.

Yarnell, S.M., J.H. Viers, and J.F. Mount. 2010. Ecology and management of the spring snowmelt recession. BioScience 60:114-127.

INDIVIDUAL LETTER 163: DAVID HERBST

Response to Comment Ind 163-1

This is an introductory comment and does not provide a specific comment on an environmental issue associated with the project. Comment noted.

Response to Comment Ind 163-2

The commenter states that erosion is estimated based on theory rather than observations. However, as discussed in Sections 4.6, 4.7, 4.8 of Appendix K.1, Balance Hydrologics, Inc. conducted channel reconnaissance where they evaluated channel and bed conditions, collected sediment samples, characterized bed sediment size and delineated SF Wolf Creek into distinct reaches based on geomorphic metrics. Observations during baseflow preceded observations and measurements made during elevated flows in January 2020.

The commenter states that a quantitative analysis of turbidity or suspended matter transport at flows from 11-17 cfs was not conducted. However, as stated on page 4.8-36 of the DEIR, the purpose of the geomorphic analysis is to determine if the project will cause substantial erosion or siltation on or offsite. Contrary to the commenter's assertion, as discussed in Appendix K.1 and shown in Table 5.5 of Appendix K.1, the predicted range of streamflow when bed sediment mobility will occur was calculated using quantitative methods. As stated on page 54 of Appendix K.2, turbidity values were also higher in the upstream location, at the proposed treated water discharge point, than they were at the downstream location. This finding suggests that there are existing sources of fine sediment located upstream of the proposed discharge location and additional runoff that enters South Fork Wolf Creek as the flow moves downstream tends to dilute the turbidity from upstream. As shown in Table 3-10 of Appendix K.2, turbidity at Reach B was 79 NTU at 9.7 cfs flow and at reach F was 48 NTU at 17.3 cfs. As demonstrated by the data, the increase in flow, similar to the maximum proposed discharge, past the proposed discharged point (Reach B) decreased turbidity. As such, the data provided in the DEIR suggests that the maximum 5.6 cfs discharge into South Fork Wolf Creek, which will meet basin plan turbidity standards as required by the RWQCB, will dilute turbidity caused by upstream sources rather than add turbidity to the creek. Mitigation Measure 4.8-1(a) requires the applicant to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. Water quality standards, enforced by the RWQCB, include total suspended solids and turbidity. Therefore, mine water discharge will not exceed turbidity thresholds.

The project would not cause substantial erosion or siltation and would be required to meet water quality goals per Mitigation Measure 4.8-1(a). Therefore, impacts to aquatic invertebrates and benthic macroinvertebrates would also not be significant. Please see Master Response 36 - Flows in South Wolf Creek, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes and quality, potential for erosion, and species impacts. Please also see Response to Comment Grp 31-12 regarding benthic macroinvertebrates.

Response to Comment Ind 163-3

The commenter asserts that the project could cause impacts to benthic macroinvertebrates. The biological impact to benthic macroinvertebrates (BMI) from mine water discharge to South Fork Wolf Creek has already been analyzed in the DEIR. (see DEIR, p. 4.4-70.) The commenter provides no information as to why the specific impact to organic matter/algae would be necessary in the analysis of the DEIR. The project's discharge would meet all water quality goals per Mitigation Measure 4.8-1(a) and would not cause substantial erosion or siltation. Therefore, it

would not have a significant impact on sensitive aquatic resources. Please see Master Response 36 - Flows in South Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. Please also see Response to Comment Grp 31-12 regarding benthic macroinvertebrates.

The commenter states that the post-project NPDES permit would require BMI biomonitoring and therefore detailed baseline data on BMI is required. However, no such monitoring is required under NPDES CAG995002 Order R5-2022-0006 waste discharge requirements for limited threat discharges to surface water. As discussed on page 4.8-31 of the DEIR, the Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (the Basin Plan). The requirements of NPDES CAG995002 are designed to implement the goals of the Basin Plan. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Plan. These beneficial uses include WARM, COLD, and WILD uses which specifically consider preservation and enhancement of aquatic invertebrates. As shown in Table 2-1 of the Basin Plan, these beneficial uses, also applicable to South Fork Wolf Creek, are as follows:

- Municipal and domestic supply (MUN)
- Agricultural supply, including stock watering (AGR)
- Hydropower generation (POW)
- Water contact recreation, including canoeing and rafting (REC-1)
- Non-contact water recreation, including aesthetic enjoyment (REC-2)
- Warm freshwater habitat (WARM) – Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- Cold freshwater habitat (COLD) – Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- Wildlife habitat (WILD) – Uses of water that support terrestrial or wetland ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats or wetlands, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Response to Comment Ind 163-4

The commenter states that the flow regime of mountain streams is an important sort of clock for timing of life cycles, growth, and reproduction or aquatic life and that when the natural hydrograph is disrupted so too are these cycles. However, the project would only increase baseflow through the discharge of treated mine water and would not change the natural hydrograph with higher flows in winter and lower flows in summer. Please also see Response to Comment Grp 2-5.

The commenter states that erosions and scouring and downstream deposition of sediments can present further problems for organisms living on stream bottoms. However, the project would not cause substantial erosion or siltation and therefore would not impact these organisms. Please see Master Response 36 - Flows in South Wolf Creek.

The commenter states that technology based effluent limitations are not appropriate for evaluating the effects of metals on aquatic invertebrates. However, as stated on page D-19 of NPDES

CAG995002 Order R5-2022-006, Section 301(b) of the Clean Water Act require permits to include conditions meeting the applicable technology requirement at a **minimum**, and any more stringent effluent limitation necessary to meet water quality standards. (see Mitigation Measure 4.8-1(a).)

The commenter also states that no quantitative values are provided for iron and manganese after treatment in Table 4.8-2. However, Table 4.8-2 shows that iron must be less than 300 ug/L and manganese must be less than 50 ug/L. The commenter states that the amounts of iron and manganese before treatment are at levels toxic to aquatic life. However, the water would be treated before discharge per Mitigation Measure 4.8-1(a) and therefore the pre-treatment values are not relevant to the analysis. Furthermore, neither iron nor manganese have maximum contaminant levels for the protection of aquatic life and the water quality goals are based on the secondary drinking water standards (for taste and odor)[2]. The commenter states that a different toxicity text (chronic rather than acute) should be performed on water currently in the mine shaft and that pockets of different water quality could exist in the underground architecture of branching mine shafts. However, such a test and analysis are not required for the analysis because existing water in the mine working would be treated prior to discharge, and treated mine water must meet all water quality objectives prior to discharge (see Master Response 35 - Discharge to South Fork Wolf Creek).

The commenter states that sampling methods used to collect and analyze stream water are not described in enough depth to tell where and in what numbers data was taken. However, the DEIR contains voluminous baseline surface water quality data. The baseline surface water quality data are described within Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location. Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a "qualifying rain event of 1.25 inches, and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR. Further analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 of the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19 while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18. As such, the DEIR presents substantial evidence on the data associated with water quality, sufficient to support the conclusions of the DEIR.

[2] https://public3.waterboards.ca.gov/wqgapps/WQ_view.jsp?backUrl=iron&chemName=Iron
https://public3.waterboards.ca.gov/wqgapps/WQ_view.jsp?backUrl=Manganese&chemName=Manganese

Response to Comment Ind 163-5

The commenter states that Table 4.8-2 of the DEIR provides only single values and not ranges of values for current water quality in the mine shaft and screening levels in the table are insufficient for a true quantitative analysis and that recently published scientific papers (Clements et al 2021) and chronic tests (criterion chronic concentrations) should be used to determine water quality requirements for the mine water discharge. The commenter also states that the California Regional Water Quality Control Board (CVRWQCB) standards for Tier 3 hard rock mine effluent (as described in NPDES CAG99500) are negligent for not including many of the toxic constituent for hard rock mines. However, the water quality requirements for treated mine water are determined by the CVRWQCB, which is the responsible agency for the regulation of the mine water discharge. As discussed on page 4.8-31 of the DEIR, the Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (the Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Plan. Mine water discharge must be treated to meet water quality goals that are protective of aquatic life and other beneficial users. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter states that conductivity of water in the shaft is high and cannot be controlled by treatment. There are no US EPA water quality criteria for the protection of aquatic life for electrical conductivity, total dissolved solids, and sulphate (see page D-34 of Order R5-2022-0006). However, the secondary MCL for electrical conductivity of 900 umhos/cm is the recommended level for the protection of agricultural supply by the Central Valley Water Board (see page D-34 and D-35 of Order R5-2022-0006). As discussed on page 4-5 of Appendix K.4, electrical conductivity (EC) is associated with Total Dissolved Solids (TDS). Appendix K.2 listed EC values for the New Brunswick Shaft water as approximately 385 µS/cm. The mobilized divalent ions from the carbonate and sulfide minerals would add to that specific conductance, although it would require significant contributions of Ca, Mg, and SO4 to surpass the NPDES CAG995002 screening level of 900 uS/cm. However, if treatment is deemed necessary for TDS mitigation at some point during mining operations, mobile ion exchange water softeners would be deployed as opposed to building additional permanent infrastructure that may not be needed or only needed for relatively short periods. These mobile units are readily available, and various vendors offer the service of replacing them as necessary as the resin becomes spent and in need of regeneration. Additionally, the resins used for these constituents are common throughout the industry for softening water and do not pose a health or environmental risk. Therefore, the proposed water treatment plant is capable of ensuring that conductance of discharged mine water meets water quality goals and the required Notice of Applicability would ensure compliance (see Master Response 35 – Discharge to South Fork Wolf Creek).

The commenter states that seepage from existing or new tailings should be tested for sulfate concentrations, acid generating capacity, and acid neutralization capacity. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA, Master Response 9 - Historical Mine Waste at Centennial Site, and Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 163-6

Please see Responses to Comments Ind 163-2 through Ind 163-5. Comment noted.

Individual Letter 164

From: David Herbst
To: Idaho MMEIR; bdofsupervisors; Matt Kelley
Subject: comments on the Idaho-Maryland Mine DEIR
Date: Wednesday, March 23, 2022 12:00:21 PM
Attachments: Issues Identified Comments IM-DEIR DBHerbst.docx

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Please find my comment letter attached.

Thank you

David Herbst

--
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Ind 164-1

Section Comment on HYDROLOGY AND WATER QUALITY

Commenter: DAVID HERBST, PhD, stream research scientist

University of California, Sierra Nevada Aquatic Research Lab, UC Santa Barbara and UC Santa Cruz

Representing my own opinion and expertise as a stream scientist expert on acid mine drainage impacts and recovery of stream ecosystems of the Sierra Nevada.

I am a permanent resident of Nevada City as of 2021 (10696 Cement Hill Road)

Background:

I have been research scientist with the University of California since 1986, affiliated with the institutions above and hold degrees from Oregon State University and the University of California at Davis. My work as a scientist has been related mostly to the ecology of streams and the influence of a variety of types of disturbance from climate change and drought, to water diversions, sediments, livestock grazing, introduced species, wildfire, and notably the effects of acid mine drainage on stream ecosystems. It is this latter subject that I draw on to inform the comments on the next pages.

Thank you for the opportunity to comment on this DEIR.

This is an important issue to the community and important that we are all given the chance to make comments. This is a highly technical issue and requires deep reading and understanding to really get at the core of potential problems. As such I find it particularly offensive that the proponent RiseGold would send a glossy brochure to the entire community claiming that "the science is clear" and that the "DEIR confirms that the Mine will not...cause water quality or quantity impacts". I disagree. The DEIR is incomplete and naive at best and misleading at worst. As the Planning Commission and County BOS representatives I hope you will be careful and thorough in your review of the real facts or lack thereof.

Issue Identified:
Stream hydrology and the augmentation of flows to South Fork Wolf Creek by inputs from the dewatering of the mine

Ind 164-2

How would the natural flow regime of this stream be affected is the basic concern here. Page 4.4-69 reports an estimate of the flow range for S. Fk. Wolf Crk - showing that adding 5.6 cfs (first 6 months of pumping) would about double the natural peak flow of winter runoff, and far more at other times. The range of natural background flow in this creek is about 0.2 cfs baseflow to 6.5 cfs peak winter runoff (p.466). Winter storm flows were noted by Balance Hydrologics (2020 report) at 11-17 cfs, and claimed that these flows did not generate erosion or sediments. However, this was not accompanied by any quantitative analysis of turbidity or suspended matter transport during the course of this event so it is not possible to actually quantify the potential for erosion with persistent higher flows that are unnatural to this channel. More important is that this does not assess the impact of altered flows on benthic macroinvertebrate populations, the foundation of food webs in streams supporting other aquatic life such as fish, amphibians and riparian wildlife. Data regarding aquatic life is absent and erosion is estimated based on theory rather than observation. Even the long-term dewatering pumping after the initial 6-month period is estimated to be 1.9 cfs and thus would be about twice the flow that is typical of mid-range hydrograph. The flows added by NID to this same water body can be substantial but are periodic and short-term.

Action Needed

Ind 164-3

Significant biological impact assessment needs to consider benthic macroinvertebrates (BMIs) and the organic matter/algae that are the foundation of the food chain in this section of the creek and downstream of the project. The post-project NPDES permit would require BMI biomonitoring but this does not satisfy the need to assess what the effects would be before the project is implemented. At that point it's too late and this is an inadequate measure if damages are already done. Page 472 does indicate the project could have a significant adverse impact (but that it could be mitigated, though again this has not been adequately ascertained for lack of data). These flows are effects that cannot be mitigated. Studies need to be done to determine how the drainage dewatering of the mines could alter what currently lives in the natural stream of S.Fk.Wolf Crk, so these need to be surveyed to evaluate vulnerability to these wastewater discharges. This concerns not only flow alteration, but chemical and metals water quality as expressed in the next issue (below). Such a biological survey of the BMIs should be expressed in terms of the highest taxonomic resolution (genus, species where possible). Detailed data on the aquatic invertebrate community in the South Fork and mainstem of Wolf Creek would be needed simply to set a baseline for whatever happens in the future. Turbidity monitoring, stream gauging and better studies of the distribution of sediments in the channel are also needed.

Background

Ind 164-4

The natural flow regime of mountain streams from winter and spring runoff to summer and fall baseflow are an important sort of clock for the successful timing of life cycles, growth and reproduction of aquatic life. When the natural hydrograph is disrupted, so too are these cycles and the natural processes of streams (Yarnell et al 2010). Erosion and scouring and downstream deposition of sediments can present further problems for organisms living on stream bottoms, another common legacy of hard rock mining.

Relevant References in the DEIR: Section 4.8

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Ind 164-5

Table 4.8-2, p. 667 (and Appendix K2 Table 3.6) gives the analysis of Tier 3 effluent limits (acute drinking water exposure limits) but these report only single values, or more often not given as a value below the "screening level", and so does not represent the range of value over time and space of the "mine shaft" sampled. The "screening level" appears to be a low sensitivity analysis (cannot find if the analytical instruments used are even specified or their analytical precision). The Table fails to give values below that level and are inadequate for a true quantitative analysis. What's more, these limits have nothing to do with chronic exposures to the aquatic life present in the mine shafts to be dewatered.
Fortunately, in a recently published scientific paper with colleagues we show data bearing on this question that comes from long-term field investigations (Clements et al. 2021). Studying the chronic metals impacts on BMI communities from 4 long-term (20+ yrs) Superfund restoration projects from across the western US (in CA, CO, ID, MT) we found the threshold at which the EPT community (the sensitive mayflies, stoneflies, caddisflies) diversity unravels. This level corresponds to the lab bioassay estimates for chronic exposures producing sublethal damages to growth and reproduction of test organisms, so our field data validated this concentration of combined metals as the limit to the vitality of aquatic life. Importantly these are chronic sublethal effects rather than the acute lethal mortality limits that the trout bioassays used. Those are not how you'd want to evaluate these problems because they are short exposures and look for mortality only instead of the continuous exposures (chronic tests)



that are both realistic and look for how metals/chemistry produce life function impairments. Acute testing is completely inappropriate to assessing the problem. More appropriate to know is that the action of metals toxicity is additive and chronic, so all should be combined as units expressing the total effect-levels rather than individual chemical concentrations. We call these units for each metal/toxicant the criterion continuous concentration CCCs (or aquatic life criteria), and in combination as a sum, the cumulative criterion units (CCUs). Using CCUs recognizes that toxicity is additive and you cannot protect aquatic life only meeting the limits of individual metals since they act together to produce toxicity (as demonstrated in the study cited). At CCU=1 is the limit beyond which sublethal effects produce impaired function and that's exactly what we found in those field studies, so is the best predictor for combined metals toxicity from mines. So, what we need are better data on all the metal constituents as their exact values (and ranges) and how variable these concentrations might be in different shaft compartments.

According to calculations of CCUs, the existing shaft water is toxic (CCU > 5), and after treatment also appears to be toxic but cannot be determined when the screening limits show only "<300" for Fe for example, which at that level alone would exceed CCU=1. So the analysis is inadequate in providing data that is quantitative and sensitive enough in resolution of concentrations of metals, and does not show the variations in the distribution of constituents. As a separate issue the concentration of total ionic solutes (conductivity) is reported at ~400 µS in the existing shaft and no values given for after treatment. This often cannot be controlled by treatment and represents what may be a very high value compared to the background natural level of specific conductance in S. Fk. Wolf Creek which is typically in the range of 50-100 µS (Table 3-8 of Appendix K2). Conductivity of 400 is quite high for Sierra streams and studies have shown it is another factor that can limit BMIs.

Action Needed
Basically the data shown is not sensitive enough and does not even report real numbers for many of the toxic metals. The RWQCB standards for Tier 3 hard rock mine effluent is also negligent in not including many of the toxic constituents from hard rock mines. So we need that data to calculate the CCUs after treatment, and need to validate the method used to determine what those concentrations would be for the treatment proposed. Bottom-line the water quality data needs improvement in detection levels and thorough sampling. Data must also include sulfate concentrations (SO4), acid generating capacity, and acid neutralizing capacity. Seepage from existing or new tailings should be included along with chemical analysis of samples mine shaft compartment waters. Chronic toxicity tests with native organisms should be included with these analyses (not acute tests).

Background
There is a long history of the use of aquatic invertebrate communities to assess the extent of damages to resources produced by mine drainage, and recovery of streams undergoing restoration.

Ind 164-6

Relevant References in the DEIR: Section 4.8 and Appendix K2 (Groundwater Hydrology and Water Quality Analysis)

References Cited:

Clements, W.H., D.B. Herbst, M.I. Hornberger, C.A. Mebane, and T.M. Short. 2021. Long-term monitoring reveals convergent patterns of recovery from mining contamination across 4 western US watersheds. Freshwater Science 40:407-426.

Yarnell, S.M., J.H. Viers, and J.F. Mount. 2010. Ecology and management of the spring snowmelt recession. BioScience 60:114-127.

INDIVIDUAL LETTER 164: DAVID HERBST

Response to Comment Ind 164-1

This letter is a duplicate copy of Individual Letter 163. Please see comments and responses in Individual Letter 163.

Individual Letter 165

From: David Kimmel
To: BOS Public Comment
Cc: Natana Spohler
Subject: Please read my comments on the Rise Gold Proposed Idaho Maryland Mine Re-opening
Date: Monday, March 21, 2022 2:26:46 PM

Dist 4

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Dear Supervisors,
My name is David Kimmel, I live on Lake Forest Drive in Lake Wildwood in District 4.
Thank you for considering my comments.
I am convinced this mine project would be a very bad decision for our county because:
1) Mines are known for being destructive to the surrounding environment. This one would be close to the center of Grass Valley not in a far off isolated location. Why risk it?
2) Rise Gold has never opened a mine and has never made a profit. Their current CEO's prior venture polluted the local environment, went bankrupt and left the local community with a big cleanup bill. Does it make any sense to place our county's welfare in such a person's hands? Why risk it?
3) Do you really know the economic impact in terms of discouraging tourism, making our county less attractive to high tech businesses, damaging wells, and decreasing property values? The current environmental review process doesn't include any analysis or study of those economic impacts. Please follow due diligence and include an economic analysis in the Draft Environmental Impact Report (DEIR).
Don't allow our community to be harmed!
Thank you.
David Kimmel

Ind 165-1

INDIVIDUAL LETTER 165: DAVID KIMMEL

Response to Comment Ind 165-1

Please see Master Responses 1, 2, and 3.

Individual Letter 166

From: David Morris <Davidpoppy7@outlook.com>
Sent: Thursday, March 31, 2022 2:34 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine

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Matt Kelley:

As a long-time resident of Nevada County, I have recently learned more about historical and modern-day mining than I ever cared to know. While the advertised benefits for reopening the Idaho-Maryland mine, particularly well-paying jobs, have a potential benefit for the area, I am more concerned about the quality of life in the heavily populated areas that will be impacted for years to come.

Ind 166-1

The results of de-watering the mine shafts may cause consequential and unwanted results; the heavy trucks with their many daily trips through essential arteries will be a major nuisance with the resulting noise and pollution; the disposal of the water from the mining operations could cause damage to existing streams and embankments;...there are so many negatives associated with the mine reopening that I fail to see how anyone could approve an IER with so many unresolved issues.

Please save the citizens of Nevada County from having to face this ordeal.

David Morris

10205 Banner Lava Cap Road
Nevada City, CA 95959
(530) 432-8931

Sent from Mail for Windows

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INDIVIDUAL LETTER 166: DAVID MORRIS

Response to Comment Ind 166-1

Please see Master Response 1 as well as Master Response 35.

Individual Letter 167

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: David Lee. O'Donnell

Address: P.O. Box 624 Downieville, CA 95936

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 167-1

I am gold miner I am third Generation Gold miner in my family. I Grew up in Sierra County Alleghany, CA. I have over 50 years plus under my Belt in mining. We need mining it will put more people to work. I am in favor For the Idaho-maryland mine To start up we are short on minerals we need TO mine our own minerals. Don't Get minerals Somewhere Else. Every day in Life we use some type miners, Here just a few Cell Phones Cars Computers Lites medicine This just few things what minerals play Big part make Everything in Life To make it run.

INDIVIDUAL LETTER 167: DAVID O'DONNELL

Response to Comment Ind 167-1

Please see Master Response 1.

Individual Letter 168

From: dave@daveandlisa.net
To: BOS Public Comment
Subject: Proposed Idaho Maryland Mine Reopening
Date: Thursday, February 17, 2022 2:45:24 PM

Dist 4

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Ind 168-1

I'm a land owner and resident of Nevada County. While the proposed re-opening of the Idaho Maryland Mine would not directly affect me or my property, I'm still opposed to it. I have read quite a bit about the positives and negatives of this endeavor and I think the cheeks in the minus column dwarf the ones in the plus column. Restarting a mining operation that shut down over 70 years ago when the immediate nearby population has grown by leaps and bounds not a wise choice in my book.

I understand the need to provide good paying jobs in order to bolster our county's economy but at what expense will these jobs cost in clean air and water as well as the health and well being of the population in general? Also, how many current local residents benefit from these jobs?

Ind 168-2

The track record for Rise Gold is pretty sketchy at best and the mining industry in general is not exactly known for cleaning up the damage they have done to the environment. Rise has undertaken a large public relations campaign to try and convince Nevada County residents, yourself and the other members of the Board of Supervisors with in my opinion are some very dubious claims. I've looked over the draft Environmental Impact Report for the Conditional Use Permit and Reclamation Plan for reopening the mine and it left a lot of questions in my mind.

Ind 168-3

I feel that our county would be much better served by welcoming businesses like farming, ranching, tourism and high tech that embrace other aspects of our heritage. I know mining is a big part of the history in our county but frankly, after studying quite a bit of this history and the impact it still has on our environment even after the last mine ceased operation 65 years ago.

David Putnam
16318 Footehold Dr.
Grass Valley, CA. 95949

INDIVIDUAL LETTER 168: DAVID PUTNAM

Response to Comment Ind 168-1
Please see Master Response 1.

Response to Comment Ind 168-2
Please see Master Response 3.

Response to Comment Ind 168-3
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 169

From: dave@daveandlisa.net
To: Idaho MMEIR
Subject: Proposed Reopening of the Idaho Maryland Mining Operation
Date: Thursday, February 17, 2022 11:50:12 AM

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Ind 169-1 I'm a land owner and resident of Nevada County. While the proposed re-opening of the Idaho Maryland Mine would not directly affect me or my property, I'm still opposed to it. I have read quite a bit about the positives and negatives of this endeavor and I think the cheeks in the minus column dwarf the ones in the plus column. Restarting a mining operation that shut down over 70 years ago when the immediate nearby population has grown by leaps and bounds not a wise choice in my book.

Ind 169-2 I understand the need to provide good paying jobs in order to bolster our county's economy but at what expense will these jobs cost in clean air and water as well as the health and well being of the population in general? Also, how many current local residents benefit from these jobs?

Ind 169-3 The track record for Rise Gold is pretty sketchy at best and the mining industry in general is not exactly known for cleaning up the damage they have done to the environment. Rise has undertaken a large public relations campaign to try and convince Nevada County residents, yourself and the other members of the Board of Supervisors with in my opinion are some very dubious claims. I've looked over the draft Environmental Impact Report for the Conditional Use Permit and Reclamation Plan for reopening the mine and it left a lot of questions in my mind.

Ind 169-4 I feel that our county would be much better served by welcoming businesses like farming, ranching, tourism and high tech that embrace other aspects of our heritage. I know mining is a big part of the history in our county but frankly, after studying quite a bit of this history and the impact it still has on our environment even after the last mine ceased operation 65 years ago.

David Putnam
16318 Footehold Dr.
Grass Valley, CA. 95949

INDIVIDUAL LETTER 169: DAVID PUTNAM

Response to Comment Ind 169-1
Please see Master Response 1.

Response to Comment Ind 169-2
Please see Master Response 3.

Response to Comment Ind 169-3
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 170

From: David Unterman <dance7@gmail.com>
Sent: Saturday, April 2, 2022 6:01 PM
To: Matt Kelley; Clerk of Board
Subject: DEIR alternatives section is unrealistic

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Mr. Kelley and Supervisors,

Ind 170-1 I'm a Nevada County resident since 1979, with experience in property development and environmental review. I raised a family here and have owned homes.

The draft EIR's Chapter 6, on alternatives to developing the mine, makes speculative, unsupported statements about alternative development. This broad-brush treatment is not the final word on other uses for the property.

Ind 170-2 Pages 6-11 to 6-13 summarize the maximum buildout of the property as industrial uses, office park, and service business light manufacturing. Then it notes downsides to these uses. On page 6-13 it states, "auto dismantling yards and milling and planing facilities would potentially create noise impacts similar to or greater than the proposed project."

Ind 170-3 Likewise, the DEIR notes that other uses permitted in the current M1-SP zoning would have their own impacts on noise, aesthetics, traffic and air quality. Smaller projects wouldn't get this level of environmental review, so they could cumulatively have worse impacts. However, the maximum development proposed by the DEIR is totally speculative.

Ind 170-4 These alleged bad neighbors are not real. Heavy equipment repair businesses are not eager to locate in Nevada County. Lumbering is on the decline.

Ind 170-5 The draft mentions office uses and fitness centers. There are already vacant retail spaces being converted for fitness centers and offices.

Ind 170-6 The DEIR suggests that large warehouse and distribution centers would locate on the site. But the site wouldn't be suitable. In reality, this county gave birth to Mountain Peoples Warehouse, but it later moved away, since Placer County has much easier access to both highways and rail lines.

In summary, the Alternatives Analysis is flawed. It invents other uses that would never actually occur, then it compares impacts from those uses to the impacts from the mine. That's a meaningless comparison.

Ind 170-7 The draft points out that gradual, piecemeal development at the current M1SP zoning would have impacts. That's correct, but zoning could change in the future. The County has ways to regulate alternative development. Just zoning the property for industry doesn't mean the industry will locate here.

David Unterman 10679 Bragg Ave., Grass Valley CA 95945

Phone 530 272 4650 For text 530 263 3297

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INDIVIDUAL LETTER 170: DAVID UNTERMAN

Response to Comment Ind 170-1

The comment is an introductory statement and does not address the adequacy of the DEIR.

Response to Comment Ind 170-2

The comment expresses a general opinion that the discussions in Chapter 6, Alternatives Analysis, of the DEIR are speculative, and cites pages 6-11 through 6-13 of the DEIR. As detailed on page 6-11 under the No Project (Alternative Use) heading, in the event that the proposed project is not developed, a Project Proponent could choose to develop the Brunswick Industrial Site consistent with the existing zoning. Development of the Brunswick Industrial Site with industrial uses, consistent with the current M1-SP zoning, could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project. Page 6-13 of the DEIR provides the following:

> As shown in the above list of permitted uses for the existing property zoning, intense uses such as Auto Dismantling Yards, Wholesaling and Distribution Facilities are already permitted without the need for a discretionary County permit. As such, under existing zoning, uses are allowed by right that potentially could cause substantial noise, traffic, aesthetic and air quality impacts without the need for further CEQA review or mitigation. Notably, the permitted use such as Distribution Facilities and Office/Professional would likely have substantial traffic impacts. The permitted uses including Auto Dismantling Yards and Milling and Planing Facilities would potentially create noise impacts similar or greater to the proposed project.

With respect to Auto Dismantling Yards and Milling and Planing Facilities, the comment does not provide specific examples of how the above uses would not potentially create noise impacts similar or greater to the proposed project. It should be noted that the operative phrase in the above passage is “potentially create.” Absent an equal-level analysis of a hypothetical use facilitated by the current M1-SP zoning, which is not required under CEQA, “potentially create” is the accurate way of describing potential impacts that could result from uses facilitated by the current zoning. As such, the discussions and analyses in the DEIR are adequate.

Furthermore, CEQA Guidelines Section 15126.6(a) requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. Consistent with CEQA Guidelines Section 15126.6(a), the alternatives evaluated in the DEIR serve to foster informed decision-making and public participation and provide enough information to enable the County to make a reasonably informed judgement about the relative merits of the alternatives.

The CEQA Guidelines do not require an equal-level analysis of alternatives, relative to the assessment of the proposed project. The level of specificity at which the DEIR analyzes project alternatives is sufficient to provide adequate comparison of potential impacts that would occur from implementation of each alternative, relative to those identified for the proposed project. Thus, the DEIR provides enough information to enable the County to make a reasonably informed judgement about the relative merits of the alternatives. To the extent that the Alternatives Analysis chapter of the DEIR provided more specific information for each evaluated alternative, such as

analysis potential noise levels or modeling of GHG emissions, such data would not change the conclusions of the Alternatives Analysis chapter.

Response to Comment Ind 170-3

Pursuant to CEQA Guidelines Section 15126.6(e)(3), an analysis of a "no project" alternative must discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. As detailed on page 6-11, the DEIR discusses development that could be facilitated by the current M1-SP zoning for the Brunswick Industrial Site in the event that the proposed project is not approved, which is consistent with the requirements set forth by CEQA Guidelines Section 15126.6(e)(3). Therefore, the discussions and analyses in the DEIR are adequate.

Please see Response to Comment Ind 170-2.

Response to Comment Ind 170-4

Please see Responses to Comments Ind 170-2 and 170-3.

Response to Comment Ind 170-5

As discussed, the DEIR discusses development that could be facilitated by the current M1-SP zoning for the Brunswick Industrial Site in the event that the proposed project is not approved, which is consistent with the requirements set forth by CEQA Guidelines Section 15126.6(e)(3). Please see Responses to Comments Ind 170-2 and 170-3.

Response to Comment Ind 170-6

Please see Responses to Comments 170-2, 170-3, and 170-5.

Response to Comment Ind 170-7

Please see Responses to Comments 170-2, 170-3, and 170-5. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 171

From: David Ward
To: bdofsupervisors
Subject: Idaho Maryland Mine proposal
Date: Saturday, March 19, 2022 1:45:21 PM
Attachments: image001.png
image004.png

Cannot identify Dist

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Ind 171-1

Dear Board members, my name is David Ward. I love living in Nevada City! This mine proposal has me a little upset. I know the area where it is proposed and I can not imagine more traffic in that area or on our local hwys. With the new housing that is being built in the Loma Rica Basin makes me wonder why a project of this size is even being thought about. Any addition of large trucks driving on hwy 174 or hwy 20 would make those hwys very dangerous and bog down already congested roads. I appreciate you listening and hearing my opposition to this project. I moved here to be in the country and not near an environmental liability that this most development will certainly be.
Best regards,
David

Davidwardstickart.com
530.613.0754

INDIVIDUAL LETTER 171: DAVID WARD

Response to Comment Ind 171-1

Please see Master Response 1.

Individual Letter 172

DEAR SIRS,

Ind 172-1

I AM WRITING THIS LETTER TO VOICE MY OPPOSITION TO THE REOPENING OF THE IDAHO-MARYLAND MINE IN GRASS VALLEY.

I WENT ON-LINE AND SAW THE DESTRUCTION OF THE ENVIROMENT CAUSED BY RISE GOLD MINE LOCATED ON BANKS ISLAND LOCATED IN BRITISH COLUMBIA, CANADA

THANK-YOU

Dawn Cox

530-272-4158



INDIVIDUAL LETTER 172: DAWN C

Response to Comment Ind 172-1

Please see Master Response 1 as well as Master Response 3.

Individual Letter 173

From: Dawna Johnson <bmergirl61@gmail.com>
Sent: Monday, April 4, 2022 4:46 PM
To: Idaho MMEIR
Subject: Comment on the DEIR for the reopening of the Idaho-Maryland Mine

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To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

To All Concerned:

Ind 173-1 I live in Grass Valley and have for over 11 years. I have ties to this community back to the 1970's, which led me to eventually move here.

This application to re open the Idaho-Maryland Mine actually surprised me, given the growth that has happened, especially above and around the applicable sites, and the hundreds of new residences that have been approved and/or are in various stages of construction. Then there was the recent issues from the Siskon Mine on the San Juan Ridge .. why would we even entertain this?

Ind 173-2 My background is nearly 4 decades in construction, CFO and owner of a general contracting corporation to be specific, and mortgage lending, underwriting and processing. I have varying levels of experience in building codes, permitting, zoning, ordinances, bonding, set backs, mineral rights, easements, etc. I'm no scientist, engineer, hydrologist, etc but I am capable of seeing a document (subject DEIR) that appears to be woefully inadequate and lacking in many areas. First thought was, where is the mention of the Centennial site? It's my understanding, this document assumes that work has been done, but it has not, and will have a myriad of impacts of its own. That must be addressed since it was being considered as a super fund site.

Ind 173-3 As to my real estate experience, I am especially concerned about property values. As it is for many of us, our home is our largest asset. I trust the disclosure to potential new home owners is adequate, especially on the new construction contracts that are very nearby the subject site.

Ind 173-4 There are so many areas with deficiencies that many other people brought up at the March 24, 2022 meeting, which I attended, and my hope is that you will address every one of them, as you said you would. My concerns are all of the many negative impacts across the board from air to water (specifically wells, especially during a sever drought and here in high risk fire area), fire impact and evacuation, noise, road degradation, and the local tourist economy (which I hope will be adequately addressed in the Economic Impact Report forthcoming) Even with mitigation, much of it remains significant and unavoidable, leaving a degraded Quality Of Life for every single resident of this county, current and future, and anyone who works or visits here.

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Ind 173-5

From my experience with bonding, and the history of the applicant, there is no amount that would be enough, if he can even get one, having forfeited in the past. Regarding the proposed well mitigation alone, no cost should fall upon current or future homeowners affected. I witnessed the NID meeting and heard the General Managers statement. They have concerns. The approval given was conditional, most notably the statement that they would re visit the subject if there are any changes to the DEIR.

Ind 173-6

I am of the opinion that this report needs a complete overhaul or be completely redone. I recommend NOT approving this report to the Board of Supervisors.

Sincerely,
Dawna Johnson



INDIVIDUAL LETTER 173: DAWNA JOHNSON

Response to Comment Ind 173-1
Please see Master Response 1.

Response to Comment Ind 173-2
Please see Master Response 4.

Response to Comment Ind 173-3
Please see Master Response 2.

Response to Comment Ind 173-4
While the DEIR concluded that significant and unavoidable impacts would occur as a result of the proposed project, according to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impacts. Please see also Master Response1.

Response to Comment Ind 173-5
Please see Master Response 3.

Response to Comment Ind 173-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 174

From: DC <dcspooner@yahoo.com>
Sent: Sunday, March 20, 2022 4:43 PM
To: Idaho MMEIR
Subject: Unacceptable Project

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Hello,

Writing as a Nevada County resident and a senior manager for the State of California.

If this project were to come across my desk for unbiased comment in the form of a Legislative Questionnaire, my comments would be as such:

Grid has been proven unable to support current consumption; additional consumption unacceptable
Environmental impact unacceptable
Impact to quality of life unacceptable
Impact to local businesses unacceptable
Impact to local wildlife unacceptable

Ind 174-1 This sends the state backwards in terms of environmental impact and negatively impacts the economy of Grass Valley, as a boutique community and tourist destination built on the back of its natural beauty and the engagement the area offers with the environment.

This is no longer a mining town. Residents who have built the community and positively benefited the economy of the county over the past several decades did not sign up for this. It is the responsibility of local and state government - you and I - to advocate for our constituents and to be the voice of the people.

Per the draft EIR, this is a business endeavor that risks harm to the community of Grass Valley in multiple ways and returns little to nothing to the community. Ask yourself - if you or your parents or your child were looking to purchase a home or business directly adjacent to this project - would this project improve or devalue that property?

Your job is to vote on behalf of the community who gave you the opportunity and privilege to speak on their behalf. Your job is to vote no.

Sent from Yahoo Mail for iPhone

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INDIVIDUAL LETTER 174: DC SPOONER

Response to Comment Ind 174-1

Please see Master Responses 1 and 2.

Individual Letter 175

From: debarmanino@aol.com
Sent: Monday, April 4, 2022 4:27 PM
To: Idaho MMEIR
Subject: EIR Idaho/Maryland Mine concerns

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To the Planning Commission of Nevada County

Ind 175-1 There are many issues that I am concerned with on this project but the main issue for me is air quality. Greenhouse gas emissions.....the report excluded elements that would put
the project over an arbitrary threshold limit but recent climate change goals say the threshold should be net zero.
Remember we all breath the same air.
Please do not recommend the reopening of the Idaho Maryland Mine.
Thank you
Deb Armanino LeBlanc

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INDIVIDUAL LETTER 175: DEB LEBLANC

Response to Comment Ind 175-1

Please see Master Response 1 as well as Master Response 27.

Individual Letter 176

Dist 3

RECEIVED

MAR 23 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

March 20, 2022

Debbie Lindh
642 Partridge Rd.
Grass Valley, Ca 95945

To: Nevada County Board of Supervisors
950 Maidu Ave.
Nevada City, Ca 95959

Dear Board of Supervisors,

Ind 176-1

I am writing you out of concern regarding the Rise Gold Corporation's attempt to reopen the Idaho-Maryland Mine. My family and I are absolutely against this proposal. Please take into consideration this company's history at other sites that they have mined. They have left those sites in horrible condition and are in fact being sued by previous victims of Rise Gold's promises. I have always found that words are meaningless for determining what a person and/or entity is like, it is actions that tell you the truth. The actions of this company have left disasters in their wake. This is not a trustworthy company.

I also am genuinely concerned about our property values and the quality of our water. We are and continue to be in a drought. We do not need a business that will rely on water usage. Please care about your community and do not support this proposed project. Minning is our history, please leave it there, in history!

Sincerely,

Debbie Lindh

Debbie Lindh

INDIVIDUAL LETTER 176: DEBBIE LINDH

Response to Comment Ind 176-1

Please see Master Responses 1 and 3, as well as Master Response 16.

Individual Letter 177

From: Deb McKitrick <ndcoker.deb@gmail.com>
Sent: Sunday, April 3, 2022 1:26 PM
To: Idaho MMEIR
Subject: Mine

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Nevada County Planner Matt Kelly

Ind 177-1 Below are my humble thoughts of the reopening of the Idaho mine.

If you consider the recent digging at Chernobyl in Ukraine and the illness caused to soldiers in a "thought to be safe area" ,you have to consider the toxins known and unknown that would be dug up from the Idaho mine. Is gold worth the health of the citizens of Nevada county?

Ind 177-2 If you look around Nevada County and see the scars left from mining .You have to consider the permanent damage that will be left 5miles from town and beyond the county's borders. Are 300 possible jobs worth destroying beautiful Nevada County forever?

Ind 177-3 Considering that we are in a drought, is taking giant volumes of precious water destroying wells and creeks ,uprooting the habitat of plants and animals worth gold? This is beyond reasoning.

Ind 177-4 Noise and traffic pollution will destroy the quality of life and discourage tourism.

Ind 177-5 All of this will decrease the value of property ,and decrease property taxes to the county.

Ind 177-6 Rise gold company has a long history of destroying the environment and not cleaning it up.

Leave the Idaho mine as history . Encourage modern businesses to come to Nevada county.

Ind 177-7 Please save our beautiful Nevada County and do not allow this mine to be reopened.
Thank-you,
Debbie McKitrick
14934 Greenhorn rd.
530 272-7515

1

INDIVIDUAL LETTER 177: DEBBIE MCKITRICK

Response to Comment Ind 177-1
Potential impacts related to reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment were addressed under Impact 4.7-2 of Chapter 4.7, Hazards and Hazardous Materials, of the DEIR. Please see also Master Response 8.

Response to Comment Ind 177-2
Please see Master Responses 1 and 2.

Response to Comment Ind 177-3
Please see Master Response 16.

Response to Comment Ind 177-4
Please see Master Response 1.

Response to Comment Ind 177-5
Please see Master Responses 1 and 2.

Response to Comment Ind 177-6
Please see Master Response 3.

Response to Comment Ind 177-7
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 178

From: deborah churchill
To: Idaho MMEIR
Subject: Opposed to Empire mine opening
Date: Wednesday, March 16, 2022 7:43:14 AM

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Ind 178-1

My backyard is literally across the street from the mine. 12655 Gem Ln, Grass Valley, CA 95945

I am opposed to the opening of the mine due to noise, air and water quality issues. I have lived in my home over 20 years and will have to sell if the mine opens. Already the noise at Brunswick & Greenhorn intersection is obnoxious.

With proposed 24 hour operation of the mine my quality of life will be greatly reduced. If I have to sell my property, it will be at a reduced price, due to this mining operation.

I implore you to vote NO on allowing this mining operation to happen.

I propose that Nevada County buy this property, and make a park, storage facility, RV park for temporary travelers. Something can be accomplished with this property other then the mining for gold!

Vote NO!

THANK YOU

Deborah Churchill
12655 Gem Ln, Grass Valley, CA 95945
530-961-2825

INDIVIDUAL LETTER 178: DEBBIE CHURCHILL

Response to Comment Ind 178-1

Please see Master Response 1.

Individual Letter 179

From: Deborah Curtis <knit.pony@gmail.com>
Sent: Saturday, April 2, 2022 5:47 PM
To: Idaho MMEIR
Subject: Comment on Mine DEIR

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Ind 179-1

I am a resident of Grass Valley. I moved to Nevada County 20 years ago to raise my children close to nature.

I am very concerned about the mine project. I feel the projections in the Draft EIR are poorly calculated. I believe more water will be required to "wet down" the toxic pilings each day than what is presented in the DEIR. Questions have not been answered. What happens during drought? What if we are all evacuated for a wildfire? Will the pilings still get watered down? I am concerned that toxic particles will get into our air in Grass Valley and that it will no longer be a desirable place to live. I own my condo in downtown Grass Valley, close to Brunswick, and I am concerned that its value will plummet.

Please ask for a more thorough EIR and answers to our questions.
Deborah Curtis
196 Rockwood Drive,
Grass Valley CA

INDIVIDUAL LETTER 179: DEBORAH CURTIS

Response to Comment Ind 179-1

The comment expresses a general opinion that more water would be required to wet down toxic pilings, but does not provide specific examples that would allow for a detailed response. For further discussion of water supply during drought conditions, see Chapter 4.8, Hydrology and Water Quality, as well as Chapter 4.11, Public Services and Utilities, of the DEIR. In addition, impacts related to Wildfire are addressed in Chapter 4.13 of the DEIR. Furthermore, as discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, the proposed project would be required to prepare an Asbestos Dust Mitigation Plan to ensure underground mining activities and use of project-generated fill would not result in the emission of asbestos containing dust.

Individual Letter 180

March 30, 2022

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Mr. Matt Kelley and
Members of the Planning Commission,

Some elements of history and highly valued and worth investments. Items like custom-made furniture or heirloom seeds; even a hand-written letter.

Other historic experiences are never never worth repeating: massacring native Americans, clearcutting forests, and polluting our planet.

Ind 180-1 Do NOT reopen the Idaho-Maryland Mine. We the people BEG you to choose health, safety, water and the wellness of our planet. Our birds beg you. Our local homes with wells beg you. Our health officials protecting our air beg you.

Choose the people over any potential profit or gain. Please listen to the voices of this community and say no to those wanting to further pillage the planet.

Respectfully yours,

email:
mspin13@comcast.net

Deborah Pinto
319 Park Ave
NC 95959

INDIVIDUAL LETTER 180: DEBORAH PINTO

Response to Comment Ind 180-1

Please see Master Response 1.

Individual Letter 181

From: Maureen Miranda
To: Matt Kelley
Subject: Why I oppose the re-opening of the Idaho Maryland mine
Date: Sunday, February 6, 2022 5:48:41 PM
Attachments: page1image35572352.png
page1image35572544.png
page1image35572736.png
page2image34603776.png
page2image34603392.png
page2image34603584.png
page3image34710528.png
page3image34710720.png
page3image34710912.png
page3image34711104.png
page3image34711296.png
page4image34761024.png
Gov Newsom.pdf
Members of Senate and Assembly.pdf

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Nevada County Planning Dept Matt Kelley Senior Planner Feb 5,2022

CC: Board of Supervisors:

Heidi Hall
Ed Scofield
Dan Miller
Susan Hoek Richard Anderson

(Dist 1) (Dist 2) (Dist 3) (Dist 4)

(Dist 5)

CC: Cea NC. Org
To Whom it may concern:

Ind 181-1

We Oppose the RE-OPENING of the IDAHO MARYLAND MINE.

We have been residents of Grass Valley, living off Greenhorn Rd for the past 40 years. We vehemently oppose the proposal to open the Idaho Maryland Mine, that is being spearheaded by Ben Mossman of Rise Gold Co.

We believe that the re-opening of this mine, if granted would have devastating and catastrophic effects on this community.

Ind 181-2

The environmental affects it would have on our water, atmosphere and wildlife, through the emissions of chemicals in the mining process, would result in the

contamination of ground water, surface water and soil. The atmosphere will have significant detrimentals effects on humans, animals and vegetation.

Ind 181-3 Should the mine be allowed to re open the endangered species cohabitating in this area, in particular, the yellow leg frog and the pacific ficher will become extinct .

Ind 181-4 Statistically mining kills and injures more workers than any industry, nearly 15,000 per year.

Ind 181-5 There are estimations of 47,000 abandon mines spread throughout every county in California, leaving the land decimated, contaminated, and abandoned.



Ind 181-6 Mining is currently responsible for 4-7% of Green house gases. Consider the impact of radioactive gases, such as the radon that is

emitted from the sludge in a tailing pond.
Other concerns , would be the possibility of sink holes and earthquakes.

"Mining accounts for the high number of human induced earthquakes worldwide. The removal of the earth can cause instability, leading to sudden collapses that trigger earthquakes".National Geographic 2017.

Ind 181-7 Furthermore , tectonic earthquakes can also collapse mine openings and tunnels with weak infrastructure.

Mining would impact and lower the water table causing the overlying rock and soil to collapse.
As is well known, sink holes are appearing more frequently each winter in Nevada County. Brunswick Rd, adjacent to the mine site, had a massive sink hole several years ago. There have been several others as well.

How is it that , Mr. Ben Mossman, CEO of Rise Gold Co. was able to acquire permits to potentially re-open this mining project, with.

Ind 181-8 NO investigation of his previous business history?

Records show that he abandoned the Hechate Strait Mining project on Bank Island in Canada and then filed Bankruptcy .

He has many violations and fines according to the Canadian Fisheries Environmental Management and Water Acts.

The investigation of that project shows again ,that he violated the environmental management act by dumping mine debris in the woods at the site. He was also sited for failure to report spills that affected the safety of fish and food.

Consequently , Ben Mossman is facing charges for damages caused. Mr Mossman has already shown his disdain and disregard for this community by not complying with the Timber Harvest Plans rules and regulations.

Mr Mossman also ignored riparian set back requirements for streams in Nevada County at his East Bennett project site.



Ind 181-9 Property values in the vicinity of East Bennett, Brunswick, Idaho Maryland and Greenhorn will decrease drastically.

Ind 181-10 If we should have a fire disaster such as the devastating fire that happened in Paradise Ca, a sufficient water supply will not be available .

Ind 181-11 DRAINS OUR WATER. "Water is one of the most precious resources we have, but Rise Gold plans pump out 3.6 million everyday for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habit, and putting 300 plus private wells at risk." CEAF

Ind 181-12 Traffic congestion , noise pollution and damage to roads (that will be continuous for 24 hours a day, 7 days a week, for a projected 80 years). Are crucial issues as well.

Ind 181-13 This proposal with all the toxic chemicals involved, the explosive materials being trucked shipped and stored, is simply an accident waiting to happen.

Rise Gold estimates 70 jobs will be provided for local residents.

Ind 181-14 The Gold profits leave this community , but the decimated quality of life will remain.

This community will gain nothing in return for the environmental destruction it will be left with.

This horrendous plan of reopening this mine with all the detrimental damage it will cause is Unthinkable and Unacceptable .

Please STOP the CARNAGE that the proposed re-opening of this mine will bring to this community.

Thank you for your attention to this very important matter. Deborah Shriver



Maureen Miranda
Email: mozophoto1@yahoo.com



INDIVIDUAL LETTER 181: DEBORAH SHRIVER AND MAUREEN MIRANDA

Response to Comment Ind 181-1
The commenter believes the project would have adverse impacts to the community. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 181-2
The commenter lists a variety of environmental concerns but does not provide any specific comments. Please see Master Response 1.

Response to Comment Ind 181-3
The commenter asserts that project implementation would result in endangered species in the project area becoming extinct, including the foothill yellow-legged frog and the pacific fisher. Potential impacts to special status plant and wildlife species are evaluated in DEIR Chapter 4.4 (Biological Resources) and are each mitigated to a less than significant level. With regards to foothill yellow-legged frog, the commenter is referred to Master Response 38 - Foothill Yellow-Legged Frog and California Red-Legged Frog. The pacific fisher does not inhabit the project area.

Response to Comment Ind 181-4
The commenter states that mining accidents cause 15,000 injuries or deaths per year. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

Response to Comment Ind 181-5
The commenter states that California has approximately 47,000 abandoned mines, leaving land decimated and contaminated. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

Response to Comment Ind 181-6
The commenter states that project will emit radioactive gases, such as radon, from the sludge in a tailings pond. The project does not include a tailings pond. The project's potential to emit greenhouse gas emissions is addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The impacts were found to be less than significant after mitigation.

Response to Comment Ind 181-7
The commenter states that the project would result in ground collapse or sinkholes. Ground collapse is discussed in Chapter 4.6 (Geology, Soils and Mineral Resources) beginning on DEIR page 4.6-44. As described in this section, "sink holes" occur within limestone environments and are caused by the dissolution of the stone itself creating a cave just below the ground surface. This type of ground collapse would not be expected in the project area which is granitic. Instead, mine-related collapse in the project area could occur where a vein outcrops on the surface and around mineshafts and other near surface mining features. A Geotechnical Assessment of Near Surface Mine Features conducted for the project recommended closure of several near surface features prior to development. Mitigation Measure 4.6-3(c) requires closure of these features under the direction of licensed geotechnical engineer and would reduce the potential for collapse

to a less than significant level. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 181-8

This comment concerns the reputation and prior mining projects of the Project Applicant. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 181-9

The commenter states that the project would have adverse impacts on property values. CEQA does not require the EIR to consider economic impacts such as decreased property values. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 181-10

The commenter states that a sufficient water supply will not be available to fight a devastating fire if the project is implemented. The commenter provides no substantial evidence that the project will result in a lack of sufficient water supply for firefighting purposes. Water used for firefighting in the project area would be provided by Nevada Irrigation District which obtains its water supply from surface waters. The commenter is further referred to Master Response 6 - Wildfire Impacts.

Response to Comment Ind 181-11

The commenter states that dewatering the mine would have a number of adverse impacts to the community. Project impacts related to drainage and potential flooding are addressed under Impact 4.8-3, beginning on DEIR page 4.8-69. Project impacts on wildlife habitat are addressed under Impact 4.4-2, beginning on DEIR page 4.4-68. Project impacts on groundwater levels and recharge are addressed under Impact 4.8-2, beginning on DEIR page 54. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 36 – Flows in South Fork Wolf Creek.

Response to Comment Ind 181-12

The commenter states that the project will result in traffic and noise pollution but does not state how the DEIR is inadequate. Project impacts related to traffic congestion and noise pollution are addressed in DEIR Chapter 4.12 (Transportation) and Chapter 4.10 (Noise and Vibration), respectively. Mitigation Measure 4.12-6(a) requires the project's construction phase traffic control plan to include monitoring for roadbed damage and specify timing for completing needed repairs. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 181-13

The commenter states that the project is an accident waiting to happen because of the project's use of "explosive materials" and "toxic chemicals", but the commenter does not state why the DEIR is inadequate with regard to analyzing potential hazards. Further, the commenter's reference to "toxic chemicals" is unclear. For example, it is noted on page 3-25 of Chapter 3 that mercury or cyanide would not be used in gold mineral processing. Potential hazards associated

with the use, transport, and storage of hazardous materials and explosives during project operation are addressed in detail in Chapter 4.7 (Hazards and Hazardous Materials).

Response to Comment Ind 181-14

The commenter states that the project's adverse impacts outweigh its benefits. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Comment 2 - Social and Economic Impacts.

Individual Letter 182

Feb 2,2022

Governor Newsom,

We are writing about your California Comeback Plan, AB1346.

Ind 182-1 We have attempted to call your attention to the proposed re-opening of the Idaho Maryland Mine, in Grass Valley, Ca. 60 miles northeast of Sacramento.

This project of the proposed re-opening of the mine will have much more of a devastating effect on California's air pollution & water resources than gas powered tools & vehicles will ever have.

Ind 182-2 This mine if allowed to reopen will use on a daily basis, 1200 gallons of fuel per day and 120 METRIC TONS of CO2 will be released into the atmosphere.

Ind 182-3 This is just the tip of the iceberg, as to the pollutants this mine has the potential capability of releasing into the air & water in this community.

Ind 182-4 As you are aware Governor Newsom the drought situation is wreaking havoc on the Sierras and the Foothill Forest. However, Ben Mossman CEO of Rise Gold Co, Formally (Yellow Giant gold mine south of Prince Rupert on Banks Island), estimate the use of,

1 MILLION GALLONS of water per day, effecting our wells. What with the extreme risks of wildfires in this area this leaves NO water supply to effectively protect this community.

Governor Newsom, we need your HELP to make the banning of this mine a priority. We need to be a part of this $ 15 Billion Dollar climate package investment plan.
We firmly believe that there will be Catastrophic & Devastating lasting effects on this community.

Ind 182-5 You and your constituents, listed below , who also supported your AB 1346 Bill neglected to respond to our letter dated (Oct 16, 2021).

CC: Assembly Member: Jim Wood (AB-9)
CC: Senators:

Lena Gonzalez	(SB 40	Robert Hertzberg	(SB 273)
Nancy Skinner	(SB 170)	Josh Becker	(SB 596)
Bill Dodd	(SB109)	Henry Stern	(SB 423)

Feb 2,2022

After a recent follow up call to your office, we were informed that there was not record of our letter ever reaching your office.Thank you for your time and consideration to this matter.

Deborah Shriver
Maureen Miranda @ mozophoto1@yahoo.com
P O Box 2998 Grass Valley, CA. 95945

INDIVIDUAL LETTER 182: DEBORAH SHRIVER AND MAUREEN MIRANDA

Response to Comment Ind 182-1
This letter is addressed to Governor Newsom and opposes the project. In the interest of CEQA's public participation goals, the County construes this letter as a comment on the project. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 182-2
The commenter is concerned about the potential air quality impacts of the project but does not identify any inadequacies of the DEIR. The commenter is referred to DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).

Response to Comment Ind 182-3
The commenter is concerned about the project's potential hydrological impacts to private wells but does not identify any inadequacies of the DEIR. The commenter is referred to DEIR Chapter 4.8 (Hydrology and Water Quality).

Response to Comment Ind 182-4
The commenter is concerned about the project's potential hydrological impacts to private wells in light of the drought, but does not identify any inadequacies of the DEIR. The commenter is referred to DEIR Chapter 4.8 (Hydrology and Water Quality) and Master Response 16 – Drought and Climate Change. The commenter appears to reference the Project Applicant's reputation. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 182-5
The commenter's opposition to the project is noted for the decisionmakers.

Individual Letter 183

February 5,2022,

Members of the Senate and Assembly,

Lena Gonzalez (SB40), Nancy Skinner (SB170), Bill Dodd (SB109),
Robert Hertzberg (SB273), Josh Becker (SB596), Henry Stern (SB423).

The information contained in the emails in regards to your
California Comeback Plan AB 1346.

The re-opening of the Idaho Maryland Mine proposal should be included
as a PRIORITY .

Ind 183-1

It encompasses all of the issues you are to attempting to address.

~WATER QUALITY~

~WILDLIFE~

~GREENHOUSE GAS~

~ZERO EMISSIONS~

Grass Valley is one of the vulnerable communities you speak of protecting.
PLEASE , do not overlook this potential disaster.

Thank you
Deborah Shriver
Maureen Miranda mozophoto1@yahoo.com

INDIVIDUAL LETTER 183: DEBORAH SHRIVER AND MAUREEN MIRANDA

Response to Comment Ind 183-1

This comment is a copy of a letter addressed to members of the California Legislature referencing various proposed legislation and broadly listing potential environmental impacts of the project. In the interest of CEQA's public participation objectives, the County construes this letter as a comment on the project. The commenter references potential impacts to water quality, wildlife, GHG emissions, and reducing emissions. The commenter does not identify any inadequacies with the DEIR and is referred to the following DEIR Chapters: 4.8 (Hydrology and Water Quality), 4.4 (Wildlife), and 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).

Individual Letter 184

Nevada County Planning Dept
Matt Kelley Senior Planner
Feb 5,2022

CC: Board of Supervisors:
Heidi Hall (Dist 1)
Ed Scofield (Dist 2)
Dan Miller (Dist 3)
Susan Hoek (Dist 4)
Richard Anderson (Dist 5)

CC: Cea NC. Org

To Whom it may concern:

We Oppose the RE-OPENING of the IDAHO MARYLAND MINE.

We have been residents of Grass Valley, living off Greenhorn Rd for the past 40 years. We vehemently oppose the proposal to open the Idaho Maryland Mine, that is being spearheaded by Ben Mossman of Rise Gold Co.
We believe that the re-opening of this mine, if granted would have devastating and catastrophic effects on this community.

Ind 184-1

The environmental affects it would have on our water, atmosphere and wildlife, through the emissions of chemicals in the mining process, would result in the contamination of ground water, surface water and soil. The atmosphere will have significant detrimentals effects on humans, animals and vegetation.

Should the mine be allowed to re open the endangered species cohabitating in this area, in particular, the yellow leg frog and the pacific ficher will become extinct .

Statistically mining kills and injures more workers than any industry, nearly 15,000 per year.

There are estimations of 47,000 abandon mines spread throughout every county in California, leaving the land decimated, contaminated, and abandoned.

Mining is currently responsible for 4-7% of Green house gases.
Consider the impact of radioactive gases, such as the radon that is emitted from the sludge in a tailing pond.

Other concerns , would be the possibility of sink holes and earthquakes.

"Mining accounts for the high number of human induced earthquakes worldwide. The removal of the earth can cause instability, leading to sudden collapses that trigger earthquakes".National Geographic 2017.

Furthermore , tectonic earthquakes can also collapse mine openings and tunnels with weak infrastructure.

Mining would impact and lower the water table causing the overlying rock and soil to collapse.
As is well known, sink holes are appearing more frequently each winter in Nevada County. Brunswick Rd, adjacent to the mine site, had a massive sink hole several years ago. There have been several others as well.

How is it that , Mr. Ben Mossman, CEO of Rise Gold Co. was able to acquire permits to potentially re-open this mining project, with.
NO investigation of his previous business history?

Records show that he abandoned the Hechate Strait Mining project on Bank Island in Canada and then filed Bankruptcy .
He has many violations and fines according to the Canadian Fisheries Environmental Management and Water Acts.

The investigation of that project shows again ,that he violated the environmental management act by dumping mine debris in the woods at the site. He was also sited for failure to report spills that affected the safety of fish and food.

Consequently , Ben Mossman is facing charges for damages caused. Mr Mossman has already shown his disdain and disregard for this community by not complying with the Timber Harvest Plans rules and regulations.
Mr Mossman also ignored riparian set back requirements for streams in Nevada County at his East Bennett project site.

Property values in the vicinity of East Bennett, Brunswick, Idaho Maryland and Greenhorn will decrease drastically.
If we should have a fire disaster such as the devastating fire that happened in Paradise Ca, a sufficient water supply will not be available .

DRAINS OUR WATER. "Water is one of the most precious resources we have, but Rise Gold plans pump out 3.6 million everyday for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habit, and putting 300 plus private wells at risk." CEAF

Traffic congestion , noise pollution and damage to roads (that will be continuous for 24 hours a day, 7 days a week, for a projected 80 years). Are crucial issues as well.

This proposal with all the toxic chemicals involved, the explosive materials being trucked shipped and stored, is simply an accident waiting to happen.

Rise Gold estimates 70 jobs will be provided for local residents.

The Gold profits leave this community , but the decimated quality of life will remain.

This community will gain nothing in return for the environmental destruction it will be left with.

This horrendous plan of reopening this mine with all the detrimental damage it will cause is Unthinkable and Unacceptable .

Please STOP the CARNAGE that the proposed re-opening of this mine will bring to this community.

Thank you for your attention to this very important matter.

Deborah Shriver


Maureen Miranda
Email: mozophoto1@yahoo.com

INDIVIDUAL LETTER 184: DEBORAH SHRIVER AND MAUREEN MIRANDA

Response to Comment Ind 184-1

This letter is identical to Individual Comment Letter 181. The commenter is referred to Responses to Comments Ind 181-1 through Ind 181-14.

Individual Letter 185

From: Deborah Van Stone
To: Idaho MMEIR
Subject: Mine
Date: Thursday, January 6, 2022 8:04:06 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 185-1

Please cancel this mine. We in the community do not want it for numerous reasons. Environmental impact traffic on small roadways, overpopulation in our area. These are some of our main concerns.
There also will be little financial benefit for our community as you're not even a local or USA company.
Sincerely
Deborah Van Stone-Stapleton

INDIVIDUAL LETTER 185: DEBORAH STONE-STAPLETON

Response to Comment Ind 185-1

Please see Master Response 1.

Individual Letter 186

From: Debra Dworaczyk <debradworaczyk@gmail.com>
Sent: Monday, April 4, 2022 12:27 PM
To: Idaho MMEIR
Subject: No Mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 186-1

Please do not approve this mine. We are already living with the destruction and pollution of previous mining activities and must not be subjected to more. We need clean air and water, no mines!

Debra Dworaczyk
530-5594324

INDIVIDUAL LETTER 186: DEBRA DWORACZYK

Response to Comment Ind 186-1

Please see Master Response 1.

Individual Letter 187

RECEIVED
FEB 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

EACH SUPERVISOR REC'D

February 11, 2022

Supervisors Susan Hoek, Chair, Heidi Hall, Ed Scofield, Dan Miller, Hardy Bullock
Nevada County Board of Supervisors
Eric Rood Administrative Center
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Dist 1

Dear Nevada County Supervisors:

We are strongly opposed to the Rise Gold Mine project based on decades as medical practitioners and researchers. The proposal from Rise Gold Mine, Inc. to reconstruct a large gold mining industry in Nevada County presents a serious public health risk.

Ind 187-1

It is our professional opinion that the medical impacts on residents of the Grass Valley area will be unacceptable, resulting in public health and respiratory damage.

Of the impacts analyzed, air pollution is most likely to physically harm residents. Asbestos alone has required huge national expenditures to remediate because it causes cancer.[i]

Ind 187-2

As with many impacts in the DEIR, it asserts that impacts can be mitigated resulting "in less-than-significant health effects". But "since *asbestos was found in lab samples* from the mine, APM-AQ-3 (Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan[ii])) would be implemented and an Asbestos Dust Mitigation Plan would be required to limit potential exposure."

Ind 187-3

Acceptable levels of public health and safety rely on mitigation plans that consultants like Dudeck, a firm in Sacramento, prepare. In this most dangerous case, the mitigation of cancer-causing toxins such as asbestos and silica depend on containment (trapping, isolating and filtering contaminated air). It's not plausible to sufficiently trap the toxic particles *that are in the 1-5 micron size range* from surface processing and trucking (100 trips per day) serpentine tailings.[iii] The trucking alone is an unacceptable vulnerability: how could trucks carrying 20 tons of tailings down Brunswick and Whispering Pines Rd. be loaded and sealed for the trip and the dumping? And this is all within typical air movement distance from mine trucking and dumping sites to several medical facilities including our hospital. This is to say nothing of the diesel exhaust which now is planned for additional state-wide regulation.

Ind 187-4

Nevada County residents, particularly those in the vicinity of the mine, are becoming aware that their lungs and overall health are likely to be damaged by the continuous mining operations. Overall, the proposed Rise Gold Mine will be a source of not only obvious impacts for your constituents but also known specific health hazards like asbestos and excessive noise.

In conclusion, we predict that the respiratory damage from air borne toxins such as asbestos will have a significant health impact in our County. Air pollution alone is sufficient cause to reject the mine proposal, and it cannot be mitigated because airborne asbestos fibers are too small to be filtered by Rise Mine's proposed mitigations.

We urge you to not vote to approve the Rise Gold Mine. It would be the worst project to ever occur to our County in post-mining era times. Furthermore, the opposition is so large in numbers of voters and legal clout that it would be serious political folly – and a terrible legacy for your years of County service.

Ind 187-5

Sincerely,

Denis Drew, MD
Retired Cardiologist

Barbara J. Drew

Barbara Drew, RN, PhD
Professor Emeritus of Cardiac Nursing & Clinical Professor of Medicine in Cardiology, University of California San Francisco

CC:
Jill Blake, Public Health Director
Dr. Sherilynn E. Cooke, Public Health Officer
Ryan Gruver, Director
Health and Human Services Agency
950 Maidu Avenue, Suite 120
Nevada City, CA 95959

[i] **Domestic Asbestos Exposure: A Review of Epidemiologic and Exposure Data,** Emily Goswami et al., *Int. J. Environ. Res. Public Health* 2013, *10*(11), 5629-5670; https://doi.org/10.3390/ijerph10115629

[ii] Ditto

[iii] https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/particle-pollution, **Particle Pollution**, American Lung Assoc. and United States EPA, 2020.

INDIVIDUAL LETTER 187: DENIS AND BARBARA DREW

Response to Comment Ind 187-1

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the health risk to the public from the project, including asbestos, is unacceptable but does not state how the DEIR is inadequate. The commenter is directed to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. The analysis of the DEIR has concluded that the health risk to the public is less than significant after mitigation.

Response to Comment Ind 187-2

The commenter is concerned about the potential for asbestos emissions. The DEIR analyzes impacts associated with asbestos and includes mitigation measures to reduce impacts to less than significant. (DEIR, Chapter 4.3.) The commenter is referred to Master Response 22 – Conservatism of Asbestos Assumptions. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to the Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. As discussed on page 4.3-61 of the DEIR, the applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan), which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced as part of the project (see Appendix E.2). Additionally, the ASUR Plan is designed to minimize asbestos content in the engineered fill produced by the project and from rock mined and processed.

Response to Comment Ind 187-3

The commenter states that the DEIR does not take into account the possible asbestos emissions when engineered fill is transported to the Centennial Industrial Site. Mitigation Measure 4.3-2 of the DEIR requires an Asbestos Dust Mitigation Plan which requires that trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings. All loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation and shall either be completely covered with tarps or have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point. The commenter is also referred to Response to Comment Ind 187-2, and Master Response 22 – Conservatism of Asbestos Assumptions.

The commenter is also concerned about diesel exhaust from project trucks. Diesel exhaust has been analyzed in the health risk assessment for the project. The commenter is referred to DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).

Response to Comment Ind 187-4

The commenter is concerned about potential asbestos-related health impacts to residents living near the project site. The commenter is referred to Response to Comments Ind 187-1 through 187-3. The commenter is also concerned about noise impacts generated by the project. Noise from mining operations and trucking has been analyzed in the DEIR and found to be less than significant after mitigation. The commenter is referred to DEIR Chapter 4.10 (Noise and Vibration).

Response to Comment Ind 187-5

The commenter is concerned about potential asbestos-related health impacts generated by the project. The commenter is referred to Response to Comments 119-1, 119-2, and 119-3. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - (Non-EIR/Administrative Issues).

Individual Letter 188

From: Denise Bellas <dbellas@royalplywood.com>
Sent: Saturday, April 2, 2022 3:12 PM
To: Idaho MMEIR
Subject: Comments on the DEIR FOR IM MINE

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Mr. Kelley,

Ind 188-1 Many of the community were not able to attend the March DEIR review, due to the event being held during working hours. Otherwise, I think you would have seen triple the attendance.

I would imagine that the County is under pressure to bring in more money for development, and fear of legal ramifications, for not allowing this to go thru. As I cannot imagine many other reasons the county would be considering this mine. The community does not want it in their City or County limits, for so many obvious reasons.

Ind 188-2

1. I would like to know if Rise Gold is going to clean up the existing toxic conditions prior to any further steps of mining being taken. Why should that not be a mandate?

Ind 188-3

2. This area would need to be re-zoned for mining. Who would get to approved that and on what basis? This area has grown, over many decades, in to a residential area primarily. Otherwise, maybe Rise Gold would be required to offer to purchase each of those homes at market value prior to mining. As once the mining starts those home values will drop significantly.

Ind 188-4 It is difficult for me to understand why a County would not value the support the desires of their community. This is a step in the wrong direction. Have Mr. Mossman mine some area that is not in the middle of our town.

Denise Bellas
13797 Allison Ranch Road
Grass Valley, CA 95949

1

INDIVIDUAL LETTER 188: DENISE BELLAS

Response to Comment Ind 188-1
Please see Master Response 1.

Response to Comment Ind 188-2
As discussed in Section 1.3, Approach to Centennial Industrial Site Baseline, of Chapter 1, Introduction, of the DEIR, separate CEQA review of a Remedial Action Plan (RAP) for the Centennial Industrial Site is being conducted with DTSC as the CEQA lead agency. DTSC released the CEQA document (Initial Study/Mitigated Negative Declaration [MND]) for the "Centennial M1 Property Clean-Up Project Remedial Action Plan" project, SCH# 2021070473) for public review on July 26, 2021. The IS/MND identifies mitigation measures with which Rise, as the property owner responsible for implementing the Centennial M1 Property Clean-Up Project Remedial Action Plan (Centennial Clean-Up Project) would need to comply, prior to and during remedial activities associated with the RAP, that would ensure that physical impacts to the environment are mitigated to a less-than-significant level. For further discussion of this separate remedial project see Master Response 4.

Response to Comment Ind 188-3
Approval of the Rezone for the proposed project is a discretionary action subject to approval by the Nevada County Board of Supervisors. In regard to concerns related to property values decreasing, see Master Responses 1 and 2.

Response to Comment Ind 188-4
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 189

From: Denise Cain
To: bdofsupervisors
Subject: No reopening of Idaho Maryland
Date: Saturday, March 19, 2022 7:27:33 PM

Dist 1

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Ind 189-1

As a resident of Nevada County, Dist. 1,
I strongly oppose the proposal to re open.

Denise Cain
15855 Banner Quaker Hill Rd
Nevada City, Ca

INDIVIDUAL LETTER 189: DENISE CAIN

Response to Comment Ind 189-1

Please see Master Response 1.

Individual Letter 190

From: DENISE ILMANEN <groovyboomer@comcast.net>
Sent: Sunday, April 3, 2022 7:51 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR comments related to the proposed mine

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Ind 190-1

Thank you for the opportunity to comment. Just briefly, the environmental impact alone appears to be far-reaching and possibly never-ending. This community cannot afford to exist under those terms. My specific additional concerns are: the use and impact of hazardous materials and water issues related to the actual mining operation; and potential impact on air quality, which is already an issue in this county.

Ind 190-2

Lastly, this company brings with it a checkered past, to say the least.

Thank you,
Denise Ilmanen
213 Celesta Drive
Grass Valley 95945

1

INDIVIDUAL LETTER 190: DENISE ILMANEN

Response to Comment Ind 190-1
Please see Master Response 1.

Response to Comment Ind 190-2
Please see Master Response 3.

From: Denise Rockwood
To: bdofsupervisors
Subject: Idaho Maryland Mine
Date: Friday, March 18, 2022 1:59:59 PM

Dist 3

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Ind 191-1

Why on earth would any logical person even consider allowing this mine when we already have so many environmental issues. Air pollution, arsenic in our water, fires, etc. Not to mention we are already in a drought, and our infrastructure is stressed. So does granting permission to a business which will tax that even further. make any sense whatsoever?

Ind 191-2

Can Rise Gold be trusted with such a deplorable history not to contribute to the problems of this fragile community? If they operate as they have in the past and are not able to protect our community with all the promises made they fold their business and leave us to clean up their mess. How will the EPA be able to contend with further destruction to our environment? There are already major toxic waterways just in this community alone, and the EPA has no budget to deal with existing issues. It seems that allowing this could very possibly be sending us in a critically wrong direction.

Ind 191-3

I have read a bit about what it will do to property values, but that does not address what it will do to already astronomical insurance costs, and then how that will affect real estate sales? Who would choose to live here, and then what does that do to our local economy?

If you allow this to move forward I believe it will be at the peril of all of us who call this home.

Character can be judged by the way one treats those who can neither hurt you or help you.

Denise Rockwood
Property Manager/Sales Agent
530 802 6588
Intero Real Estate Services
170 E. Main Street
Grass Valley, CA. 95945
dennysden58@gmail.com

INDIVIDUAL LETTER 191: DENISE ROCKWOOD

Response to Comment Ind 191-1
Please see Master Response 1.

Response to Comment Ind 191-2
Please see Master Response 3.

Response to Comment Ind 191-3
Please see Master Response 2.

Individual Letter 192

From: Dennis Wolfers
To: bdofsupervisors
Subject: No Mine
Date: Tuesday, March 8, 2022 3:09:48 PM

Dist 4

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Ind 192-1

I oppose the reopening of the Idaho-Maryland Mine.

My family & I moved to Nevada County from the Bay Area more than 20 years ago. We have enjoyed a cleaner, quieter life here. We plan to continue to live in our home in Rough and Ready through our retirement years.

Any resumption of mining activity in the county can only serve to strain our inadequate infrastructure, and degrade the quality of life for all residents and visitors.

--
Thank you,
Dennis Wolfers
530-277-8909 cell
530-271-1052 home

INDIVIDUAL LETTER 192: DENNIS WOLFERS

Response to Comment Ind 192-1

Please see Master Response 1.

Individual Letter 193

From: Diana <dianarunnels@yahoo.com>
Sent: Saturday, April 2, 2022 10:53 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org; dianarunnels@yahoo.com
Subject: Idaho-Maryland Mine Project Concerns

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To Whom It May Concern,

I am pleased to have this opportunity to express my concerns about the Mine Project.

Ind 193-1 There are so many concerning facets about the project relating to the flawed and inconclusive DEIR presented to our community. I will focus on the first that come to mind, but please know that all the topics represented thus far, by so many, including County and private professionals and consultants, are absolute concerns as to why this project looms as a disaster situation for our community.

Ind 193-2 Hydrology is a priority concern, personally having experienced drilling a deeper well just a few years ago. This was a huge expense: the drilling operation itself; the subsequent need to purchase a more powerful well pump due to the deeper depth. There is no "aquifer mapping". We have a water shortage and we have been warned about ongoing drought conditions. None of us can feel comfortable with our wells continuing to support our needs. But! We can anticipate the absolute fact that the Mine Project will pump water at a high volume continually: this is part of the mining process. There is no way any testing that has been performed to date can be presented as evidence and justification for the assumed impact of the Mine Project. This is a fact.

Ind 193-3 Furthermore, the pumped water that will be added to Wolf Creek...the hazardous materials, contaminated water...and other unknown hydrological impacts has unknown environmental impacts. Other parts of the hydrological studies presented are short-sighted. We do have the very visible Empire Mine "ponds", the mining influenced water (WIW) project that represents the contaminants that resulted from mining in our area. We should learn from this incredibly costly "fix".

Ind 193-4 One cannot anticipate sinkholes once water is depleted. There are many examples of sinkholes in our gold country in general, knowing of the extensive mining, tunneling that occurred when mining was extensive. Sinkholes are dangerous and there have been more incidents within our drought years, without intentionally pumping more existing water from the ground.

Ind 193-5 All the issues that are now being documented will impact properties in our community. We hear of new employment opportunities adding to the tax base in our county. But the costs of doing business (allowing the Rise Gold mining operation) will have immediate negative impact. If a mine is in operation, it will only be a short time until there will be economic impact: real estate sale dependent disclosures of potential mining impact; increased home insurance costs, living in an already high-risk fire area; real estate values will drop.

1

Ind 193-6

Rise Gold still faces litigation that looms as an example of how another mining project has been severely mismanaged. This fact in itself should be a glaring factor as to why our county should not approve another mining endeavor.

Regards,
Diana Runnels
13797 Sontag Hill Road
Grass Valley

INDIVIDUAL LETTER 193: DIANA RUNNELS

Response to Comment Ind 193-1
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 193-2
The commenter is concerned about the project's impacts to private wells, especially in light of the drought, but does not state how the DEIR is inadequate with respect to hydrology impacts. The analysis in the DEIR concluded that impacts to domestic wells is less than significant after mitigation. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Responses 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 193-3
The commenter is concerned about the project's discharge of treated water to South Fork Wolf Creek but does not state how the DEIR is inadequate with respect to hydrology impacts. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 193-4
The commenter is concerned about ground collapse and sinkholes from the dewatering of the Idaho-Maryland Mine. The commenter is referred to Master Response 29 – Near Surface Workings.

Response to Comment Ind 193-5
The commenter is concerned the project will negatively impact property values in the community. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 193-6
The commenter references the Project Applicant's former projects. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Individual Letter 194

No name/address

~~I support re-opening the Idaho-Maryland Mine~~

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

WE ARE COMPLETELY OPPOSED TO THE MINE Reopening. THANK YOU

RECEIVED
MAR 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Ind 194-1

Dist 4

STRONGLY OPPOSE

I ~~support~~ re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED
MAR 21 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) Diane L. Cherry

Address _____ ZIP _____

Phone _____

Ms Diane L Cherry
PO Box 94
N San Juan, CA 95960

INDIVIDUAL LETTER 194: DIANE CHERRY

Response to Comment Ind 194-1

Please see Master Response 1.

Individual Letter 195

From: Diane Figuly <difiguly@gmail.com>
Sent: Sunday, April 3, 2022 10:18 PM
To: Idaho MMEIR
Subject: No Mine

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Dear Matt Kelley,

I have lived in Grass Valley my whole life. I live on Cedar Ridge that adjoins the Brunswick site. I have lots of concerns about the mine's possible reopening. I want to focus on air quality because I use an inhaler. Pollutants and particles in the air affect my health and my family's. Rise's operation will add more than significant pollutants to the air.

The International Agency for Research on Cancer (IARC; part of the World Health Organization) classifies Diesel engine exhaust classified as "carcinogenic to humans". Rise expects Diesel trucks to make 100 trips a day to load and unload engineered fill once the mine is operating. Table 4.3-9 (pdf page 345) estimates 10,196,310 on road vehicle trip miles for the first 5 years of delivery to Centennial, 11,841,310 miles for the next 6 years and 291,450,740 for the remainder of the mines operation (70 years). Added to that is the construction phase pollutants and all the deliveries of other goods and services to the mine adding to the pollution.

Ind 195-1

The American Lung Association rates California air with an F grade for high ozone days. (https://www.lung.org/research/sota/city-rankings/states/california) The California Air Resources Board states that "DPM (Diesel Particulate Matter) is typically composed of carbon particles ("soot", also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and oxides of nitrogen (NO_x). NO_x emissions from diesel engines are important because they can undergo chemical reactions in the atmosphere leading to formation of PM2.5 and ozone. " (ww2.arb.ca.gov › resources › overview-diesel-exhaust-and-heal

It seems like the Conclusion in the DEIR (pdf page 393) sums up Rise's position on Greenhouse Gases. It says "the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Consequently, the project's impact is less than cumulatively considerable." With miles and miles of Diesel trip and other equipment adding vast amounts of pollutants, the Rise solution is to say "oh well" if the county, state and federal agencies doesn't have a clear regulation, then adding this pollution over time is not a problem. I disagree with the narrow thinking. The possible amount of pollution the 80 years the project will add to the declining air quality must be substantially reduced from the beginning by Rise and not just depend on other's efforts at more "green" energy generation.

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As I read the 4.3 chapter, it seems like Rise's choice of mitigations were usually minor like keeping equipment tuned up or buying Tier 4 engines in the Rise vehicles. These are least possible conservation solutions kept many of the predicted pollution readings often under the maximum load limit for the region. Thinking of it in a different way, Rise can/will produce a lot of pollution and greatly impact the environment and on health locally.

As I read the chapter 4.3 I found that the discussion was focused on

- the "conservative assumptions"
- (example: pdf page 341, 351, 363, 386, 387)
- or "conservative approach" (example pdf page 336, 353),
- conservative
- *something else*
- (example: pdf page 352, 389, 395)

Ind 195-2

- use a "common sense" approach
- (example: pdf page 357)
- "where feasible"
- *use this instead of that*
- (example: pdf page 387)

This allows the discussion to be focused on the best-case scenarios. For example, Rise will decrease pollution from diesel trucks by tuning them up regularly, not idling more than 5 seconds and more. This doesn't seem to balance the huge amount of CO_x, NO_x, PM_x and other pollutants they are releasing with the mining operation. Adding 80 years of pollution described on Table 4.3-19 showing daily mitigated totals of emissions, there are 8,889,940 lbs produced in Rise's own estimates, almost 9 million pounds.

Rarely in this section did I find a range of best-case to worse-case situations provided except one in addressing a PSPS power shutoff. (pdf page 395) In that case, diesel generators would run the following equipment during a grid power outage:

Ind 195-3

- for dewatering
- ventilation

2

- compressed air system
- electric locomotion
- lighting
- hoist operations
- processing plant slurry
- water treatment

Imagining the snowstorm this past Dec 25th with an 8 day stretch without PGE electricity, I would have imagined Rise doing the following: use the generators to make sure everyone is safely out of the mine and shut down operations. That's what my neighbors and I did - we did use our generators after turning off everything we could, reducing the house temperature drastically, and getting by. Why would it be necessary for Rise to keep the slurry going so the materials don't "fall out"? Why is it ok for them to use a significant amount of diesel so there is little to no delay in getting the gold? Their data built 10 days of generator use into their charts but using diesel for 8 days to do the processes they describe seems more than wasteful after making sure the employees are safe.

Ind 195-4

The data is sparse or uses data that is not truly reflective of the area. The NSAQMD - the Air District for Nevada, Plumas and Sierra counties is located on Litton near Briar Patch (a mile away). It's unclear in the data presented if that was the only sensor site used for the baseline for O_3 and $PM_{2.5}$ (pdf page 302) The other pollutants (such as CO, NO_x, PM_{10}) were evaluated from data collected in Yuba City, 31 miles away. The footnote for Table 4.3-4 says: "The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity." With the possibility of producing so much emission pollution from the diesel round trips dumping tailings, why wasn't baseline data collected locally and then monitored locally? How does Yuba City air reflect what is happening along Brunswick? Is it *generally representative*?

Ind 195-5

It is unclear how data was arrived at in another example. The difference in pollution was reduced by some unknown type of mitigation compared in Table 4.3-17 (amounts estimated before mitigation) and Table 4.3-19 (amounts estimated after mitigation are applied). (pdf pages 360 and 365) When these two tables are compared, it appears the only difference is in the Off-Road Equipment rows.

OFF ROAD EQUIPMENT - year 2021 Construction Phase

Pollutant identified *Maximum - pounds/day*	4.3-17 chart value - before mitigation	4.3-19 chart value - after mitigation
ROG	6.71	3.25
NOx	53.84	15.97
CO	50.83	54.08
PM_{10}	2.30	0.60
$PM_{2.5}$	2.15	0.60

In that section, what accounted for the dramatic change in the amount of pollutions produced daily wasn't evident. Finally, in the Mitigation section (pdf page 369) DEIR stated the 2nd chart reflects the reductions that would occur with implementation of APM-AQ-1 and APM-AQ-2 and associated with Mitigation Measure 4.3-1(b), which would result in a reduction in construction contractors' equipment exhaust criteria air pollutants during project construction (year 2021). Footnote 39 indicates the construction contractors would buy equipment with Tier 4 engines. This is a best-case scenario but life is messy and many contractors may not have this new equipment to use or not enough to bring down the pollution levels given in the tables. What happens then? Rise can blame the contractors and not be at fault?

Mitigation Measures 4.3-1(b) is to submit a plan - Construction Exhaust Emissions Minimization Plan. This plan will include recommending 1) using alternative sources of power so portable diesel engine use is greatly reduced. 2) Diesel engines bigger than 50 hp should use a Tier 4 engine or if not a 25 hp should have a 3 Tier engine.

Ind 195-6

Bullet point A explains: "For purposes of this mitigation measure, "commercially available" shall mean the availability of the Tier 4 Final equipment, taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites." (pdf page 369). Bullet point B says someone will keep records of this effort to comply.

Does this mean that if no one worked out the details, Rise's construction contractors can/will use construction equipment that is available but not necessarily to the desired code and efficiency? What happens when monitoring doesn't match the very conservative assumptions given in the charts?

Overall, these are the areas where the DEIR is inadequate:

Ind 195-7

- The Plan tends to reflect conservative assumptions that aren't a comprehensive reflection of what might happen and what will be a possible solution to the best case and the worse-case situations.

Ind 195-8

- The plan doesn't address how it will remove pollutants the construction or operation of the mine generate. It does try to limit some but overall adds vast quantities of polluting gases and particles to the local area and the region.

Ind 195-9

- It doesn't fully address how some people's health will be impacted and the consequences be address

4

- in treatment and financial support. (Example asbestos entering air and cumulatively cause asbestosis.)

Ind 195-10

- Some of the mitigations are "iffy", the DEIR used the phase "common sense". For example, if a contractor's equipment is older and doesn't have a Tier 4 engine, it is "common sense" to used anyway and ignore the higher levels of pollution that is generated. The shift of responsibility is from Rise to the sub-contractor in the construction phase. Clear concise alternatives need to be included in the DEIR if Rise is using the mitigation to claim the pollutant level will be in the attainment level.

Ind 195-11

- The extended use of diesel generators when grid power electricity wasn't near by the work area and when the electrical grid goes down cancels some of the few efforts to reduce these pollutants in the atmosphere in other phases of the mining operation.
- The overall amount of pollutants with successful mitigation used as described is still too much to add to the cumulative effect of climate change, more severe weather events, more intense wildfires, and decline in air quality. What can be done to lower the pollution much more over the 80 years.

Respectfully,
Diane Figuly

INDIVIDUAL LETTER 195: DIANE FIGULY

Response to Comment Ind 195-1

The commenter provides information regarding the health effects of diesel and criteria air pollutants and disagrees with conclusions in the DEIR regarding air quality impacts. The County acknowledges the comment and notes it expresses the opinions of the commenter and does not raise a specific issue related to the adequacy of the analysis of the DEIR. The comment is part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Response to Comment Ind 195-2

The commenter asserts that the mitigation measures applied in the DEIR to reduce air pollutant emissions were usually minor and suggests that the emissions associated with the entire life of the project would be substantial. As discussed on page 4.3-41 of the DEIR, the Northern Sierra Air Quality Management District (NSAQMD) established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions. Criteria air pollutant emissions from the project, including ozone precursors and particulate matter, have been analyzed in the DEIR and have been found to be less than significant after mitigation. The commenter's opinion that the analysis is based on the "best-case scenarios" does not raise a specific issue related to the adequacy of the analysis of the DEIR. Conversely, the DEIR's air quality analysis was not based on best-case scenarios, but rather was based on conservative assumptions. The County has included the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Response to Comment Ind 195-3

The commenter asserts that the DEIR should analyze a worst-case scenario for generator use, and the associated air pollutant emissions. However, the use of emergency backup generators is speculative and is not required to be analyzed under CEQA. (see CEQA Guidelines Section 15384.) The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). Additionally, the commenter asserts that use of diesel fuel for generators may be wasteful, but does not provide evidence of why such use would be wasteful. The potential for wasteful use of energy was analyzed in Impact 4.3-4 of the DEIR, and the County determined that the project would not result in wasteful use of energy. Please also see Response to Comment Agcy 8-17.

Response to Comment Ind 195-4

The commenter questions the selection of ambient air quality monitoring stations summarized in the "Local Air Quality Monitoring" section of the DEIR, Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The ambient criteria air pollutant data are presented for context and are used to determine the NSAQMD's compliance with the AAQS and to set applicable thresholds of significance. Therefore, they are provided for context, but were not directly used in the analysis of the project's impacts from criteria air pollutants. Significance determinations in the DEIR are

based on comparison to the NSAQMD thresholds, which were developed based on compliance with AAQS. Further, the NSAQMD reviewed all versions of the Air Quality and Greenhouse Gas Technical Report (included as Appendix E.1 in the DEIR) and did not identify issues regarding the ambient air monitoring stations selected.

Response to Comment Ind 195-5

The commenter questions the validity Mitigation Measure 4.3-1(b) included in the DEIR based on Tier 4 equipment availability. Tier 4 engines for horsepower between 11 horsepower and 75 horsepower were available starting in 2008. For engines with horsepower between 75 and 175, Tier 4 engines were available starting in 2012. For engine horsepower between 175 and greater than 1,200, Tier 4 engines were available starting in 2011. As such, equipment engines that meet Tier 4 emission standards are currently available at the time of this analysis, and would continue to be available during the project's construction year. Please refer to the US EPA's Nonroad Compression-Ignition Engines: Exhaust Emission Standards for details (available: https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA05.pdf).

Based on the California Air Resources Board's OFFROAD2017 model, which uses past data on the adoption rate of previous engine Tiers after their introduction to forecast future year adoption rates, the 2019 statewide construction fleet would include 41,862 pieces of diesel equipment meeting Tier 4 Final emission standards, representing approximately 30% of the statewide construction fleet. Tier 4 Final equipment fleet populations would grow to 50,886 and 61,039, representing 36% and 42% of the 2020 and 2021 construction fleets, respectively. Project construction was assumed to commence in January 2021 and end in December 2021. Project construction may begin at a later date, in which case the supply of Tier 4 Final equipment would be higher. California Air Resources Board's OFFROAD2017 inventory shows more than 40,000 pieces of Tier 4 Final equipment are included in California's construction fleet and cleaner engines, including Tier 4 Final, would be integrated into large and medium fleets to meet CARB regulations for off-road diesel vehicles. Therefore, it is feasible for the project to utilize and incorporate Tier 4 Final equipment for project construction.

The commenter questions what will happen if contractors do not use Tier 4 engines as assumed in the DEIR; however, those engines are currently available, and the DEIR requires use of Tier 4 engines, if available. Mitigation Measure 4.3(b) requires a Construction Exhaust Emissions Minimization Plan. As stated in the mitigation measure (page 4.3-77 of the DEIR), this Plan must be submitted to Nevada County for review and approval. The mitigation measure requires the applicant to maintain and submit records to Nevada County concerning its effort to comply with this requirement. This mitigation measure is clear on the requirement of the applicant and its contractors to use Tier 4 F engines and the involvement of the County to ensure compliance. The applicant is responsible for the oversight of contractors or sub-contractors who perform work on the project site. Moreover, the County has ample authority to revoke the project's permits if the operator does not comply with the required mitigation measures and conditions of approval. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 195-6

This comment also pertains to Mitigation Measure 4.3-1(b) included in the DEIR. Please see Response to Comment Ind 195-5 above.

Response to Comment Ind 195-7

The commenter suggests that the air quality analysis included in the DEIR is not a comprehensive analysis and does not reflect a worst-case scenario. Please see Response to Comment Ind 195-3 above regarding worst-case scenario analysis. The commenter's opinion that the analysis is not



comprehensive does not raise a specific issue related to the adequacy of the analysis of the DEIR. CEQA requires a good faith effort to estimate emissions from the project during construction and operation. As such, estimation of emissions during the construction and operation of the project are based on the best project-specific information and industry-standard emission factors that were available at the time of analysis, as thoroughly described in the "Method of Analysis" of Chapter 4.3 of the DEIR, beginning on page 4.3-44.

Response to Comment Ind 195-8

The commenter suggests that the air quality analysis in the DEIR does not address the air pollutant emissions generated by the project. Chapter 4.3 of the DEIR and the attached Health Risk Assessment (included in Appendix E.1) address the criteria air pollutant emissions from the project, as well as the toxic air contaminant (TAC) emissions and associated potential health risk impacts, which have been analyzed in the DEIR and have been found to be less than significant after mitigation.

Response to Comment Ind 195-9

The commenter states that the air quality analysis in the DEIR does not address how some people's health will be impacted by air pollutant emissions generated by the project. A Health Risk assessment has been completed for the project (see Appendix E.1 in the DEIR) and the DEIR determined that public health impacts from exposure to project TAC emissions (including asbestos in fugitive dust) will be less than significant after mitigation.

Response to Comment Ind 195-10

The commenter questions the "common sense" aspect of mitigation in the DEIR. Notably, the phrase "common sense" is used once in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) within the context of Applicant Proposed Measure (APM)-AQ-1 and applies to the minimization of construction equipment idling. The complete text is on page 4.3-65, as follows:

> Unnecessary construction vehicle idling time shall be minimized. The ability to limit construction vehicle idling time is dependent on the sequence of activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for immediate use. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project shall apply a "common sense" [emphasis added] approach to vehicle use such that idling is reduced as much as possible below the maximum of 5 consecutive minutes required by regulation (13 CCR 2449 and 2485). If a vehicle is not required for use immediately or continuously for activities or for other safety-related reasons, its engine shall be shut off.

As indicated in this APM, the "common sense" approach to vehicle use is to limit idling as much as possible below the maximum of 5 consecutive minutes required by regulation (13 CCR 2449 and 2485). However, this does not supersede or contradict the provisions of the regulatory requirement. This APM does not relate to Mitigation Measure 4.3-1(b) and the use of higher tier engines during construction. Please see also Response to Comment Ind 195-5 above.

Response to Comment Ind 195-11

The commenter states that extended use of emergency diesel generators cancels some of the project's efforts to reduce air pollutant emissions and contends that the project results in too much overall pollutants "to add to the cumulative effect of climate change, more severe weather events, more intense wildfires, and decline in air quality." Firstly, the analysis of the extended use of emergency diesel generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., and as such, is not required under CEQA. Nonetheless, for purposes of the HRA,

diesel emergency generators were assumed to operate for up to 100 hours per year. (see DEIR, p. 4.3-79.) The commenter's opinion that the project results in too much overall air pollutants does not raise a specific issue related to the adequacy of the analysis of the DEIR. The County has included the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

Individual Letter 196

Ind 196-1

~~I support~~ Do not re-opening the Idaho-Maryland Mine

Nevada County is ~~in tremendous need of~~ new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Diane Gould

Address P.O. Box 842 NC. ZIP 95959

Phone 204 Upper Park NC.

Email Address

Do not support.

INDIVIDUAL LETTER 196: DIANE GOULD

Response to Comment Ind 196-1

Please see Master Response 1.

Individual Letter 197

From: Diane Gould
To: bdofsupervisors
Subject: Mine
Date: Thursday, February 10, 2022 7:20:16 AM

Dist 1

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Ind 197-1

Do not reopen the mine the increased air pollution, risks to waterways and traffic are not worth it. It would negatively impact our community
Diane Gould
207 upper park Nevada city

Sent from my iPhone

INDIVIDUAL LETTER 197: DIANE GOULD

Response to Comment Ind 197-1

Please see Master Response 1.

Individual Letter 198

From: Diane <sby4dmg@gmail.com>
Sent: Sunday, April 3, 2022 7:43 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Idaho-Maryland Mine

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Hello,

Ind 198-1 I support the position of CEA FOUNDATION & MIneWatch Coalition and strongly recommend a NO VOTE for the proposed reopening of the Idaho-Maryland Mine.

I'm concerned how this proposal impacts wells in the area. The FEIR needs to analyze all the wells potentially impacted by the project. The impact analysis on wells in the DEIR is inadequate, underestimates impacts, and proposes inadequate mitigation measures.

Ind 198-2 I worked in the field of Electronics Wafer Fabrication and am familiar with disposal and 'cleaning/filtering" of chemicals, acids, and gasses used to manufacture silicon circuits. Roof mounted "Scrubbers" emitted gasses that had passed through filters and were claimed to be safe for the environment. Yet, many employees found the paint peeling on their cars which were parked in the company parking lot. Spent chemicals/acids were "filtered" and "treated", then released into sewer storm drainage and many years later, unsafe contamination levels were found in the waterways in the surrounding areas.

Ind 198-3 The discussion of water quality impacts related to loss of wetland vegetation on DEIR page 5-7 is inadequate because potential loss of cover vegetation due to road widening required near the creek is not discussed. Mitigation should include a 100 foot centerline [or more] of creek setback from the road construction zone.

Ind 198-4 My husband and I planned our Retirement in Grass Valley, are now ful time residents, and built a home, hiring local contractors to do the work, buying materials locally, membership/participation in local Clubs/Organizations, and patronizing many local businesses throughout the years.

We Love Nevada County. In our view, The Idaho-Maryland Mine will not bring economic gains to the County, as claimed, nor enhance Quality of Life for the good citizens.

--
Regards, Diane Graham

INDIVIDUAL LETTER 198: DIANE GRAHAM

Response to Comment Ind 198-1

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter states that the analysis of impacts to domestic water wells in the DEIR is inadequate but does not provide evidence of such. The commenter is referred to Chapter 4.8 of the DEIR, Master Responses 14 - Adequacy of Groundwater Model, and Master Response 15 -Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 198-2

The commenter states that electronic wafer fabrication facilities have damaged cars and chemicals entering storm drains contaminated local water ways in their experience. The project does not include electronic wafer fabrications. Air quality impacts from the project have been analyzed in the DEIR and have been found to be less than significant after mitigation. The commenter is referred to Chapter 4.3 of the DEIR. Water quality impacts are addressed in Chapter 4.8 and found to be less than significant after mitigation.

Response to Comment Ind 198-3

The commenter states that the discussion of water quality impacts related to loss of wetland vegetation on page 5-7 of the DEIR is inadequate because loss of vegetation due to road widening near the creek is not discussed and that the mitigation should include a 100-foot setback from the creek. The page number provided by the commenter does not appear to be correct. Disturbance to wetlands and vegetation communities from the project, and management plans for work within 100 feet of perennial streams, are discussed and analyzed in Chapter 4.4 of the DEIR.

Response to Comment Ind 198-4

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Individual Letter 199

Dianna Suarez
suareztribe@yahoo.com

April 4, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

Dear Sir, I have lived in this area since 1974 when my parents moved to Lake Wildwood. I have lived in both Nevada City and Grass Valley and within the Bear River watershed since that time. I retired from the US Forest Service as a Forester. Since my retirement, I have been involved in learning all I can about our watersheds and rivers. I am concerned about many issues with the mine. One of my concerns is dewatering of local groundwater to reopen Idaho Maryland Mine, by the Rise Gold Corporation

Let's start with some facts:

- According to the Nevada Irrigation District website, 1 million gallons of water equals 3.07 acre feet. An acre foot of water is a volume the size of an acre, 1 foot deep.
- According to the Rise Gold Technical Report, inflow to the mineshaft is estimated to be 1,375 acre feet per year, and 2,500 acre feet of water currently fills the mine workings.(This differs from the Hydro report by 3 af)
- According to an internet search including the NID website, the value of an acre foot of water varies greatly but averages from $50 to $70 locally. It is currently $400/af in the valley, and going for up to $2000/af to desperate farmers.

Ind 199-1

The following statements of fact are based on information from Rise Gold's website, and personal research.

- The mining company plans to pump out the 2,500 acre feet during the first 6 months to drain the shaft, (Groundwater and Hydrology Analysis Report for the Idaho Maryland Mine by EMKO for Rise, page 13)
- and (1.224 million gallons per day x 3.07 af/million gallons) x (365 days/yr = 1,372 acre feet/yr) (page 15) annually to maintain it.
- The permit is for 80 years.
- They will use Wolf Creek as a conveyance. Wolf Creek is a tributary to Bear River below Combie Reservoir and upriver from Camp Far West Reservoir owned by South Sutter Water District.
- The water that Rise Gold plans to pump is groundwater that would otherwise be used by the People with wells for free, local creeks, ponds, wildlife, trees, and vegetation.

Dianna Suarez
suareztribe@yahoo.com

April 4, 2022

- NID has a diversion from Wolf Creek into the Tarr Ditch below where the water would enter Wolf Creek. The Tarr Ditch has around 20 customers who take water for $12 per acre foot because of a legacy easement, including NID Director Rich Johansen and Nevada County Supervisor Sue Hoek.

So, based on these facts, and as we enter another dry period where the value of water is rapidly increasing; we must look at what this may mean in loss of value to our communities.

- During the first 6 months, the mine operators will discharge between $125,000 and $175,000 worth of water down Wolf Creek into Bear River. (2,500 acre feet x $50-$70/af)
- The next six months will see $34,300 to $48,000 down the creek and between $68,600 and $96,000 will flow down the creek annually for up to 80 years (1,372 af x $50-$70/af).
- In the first decade, a whopping $776,700 to $1,087,400 of valuable water will be lost to this community. That is over a million dollars worth of water down the creek in the first decade!!

The next decade will see an additional $687,500 to $962,500 down the creek, and for the next 60 years thereafter; for a grand total of between $5.6 and $7.8 million dollars worth of valuable water down the creek and out of our communities. Meanwhile, local citizens whose wells have been dewatered will pay ever increasing rates for water that was once free.

Another fact: In only 35 years Rise Gold will have dewatered and discharged enough water down Wolf Creek to fill Scotts Flat Reservoir to capacity.

(2,500 af + 686 af = 3,186 af first year,
+ 1,372 af/year thereafter. 3,186 + 9(1,372) = 15,534 af first decade
+ 13,720 af second decade + 13,720 af third decade = 42,974 af
+ 6,860 af next 5 years = 49,834 af
Scotts Flat capacity is 49,000 af)

Ind 199-2

Please address the following:

1. How will the monetary costs of lost groundwater value be returned to the community?

Dianna Suarez
suareztribe@yahoo.com

April 4, 2022

Ind 199-3 2. How will the groundwater and dependant ecosystems be restored from the loss of 49,000 acre feet of water after 35 years?

Ind 199-4 3. What are the cumulative impacts over 35 years, of 49,000 acre feet of groundwater deficits, to the ecology of the Bear River watershed?

Ind 199-5 4. Where is the risk assessment for drier landscapes and increased wildfire as a result of groundwater removal over 35 years and 49,000 acre feet of depletion?

Ind 199-6 5. The Bear River is already impacted with point source pollution from legacy mining. Where is the risk assessment to Bear River from further arsenic and other mine pollutants?

Ind 199-7 6. Will Rise Gold pay for water quality monitoring in Bear River?

Ind 199-8 7. What is the response time to enforcement when water quality monitoring determines that mine runoff exceeds acceptable levels of pollution?

Ind 199-9 8. As Rise Gold pumps out groundwater under their private land, what is the impact to other private parcels' groundwater adjacent to the property?

Ind 199-10 9. Does Rise Gold have the rights to groundwater belonging to the citizens of Grass Valley?

Ind 199-11 10. Where does Rise Gold's groundwater end and the groundwater protected by the Public Trust Doctrine begin?

Ind 199-12 11. What is the beneficial use provided by the water that Rise Gold pumps out of the mine shafts? Will they need a water right to do this?

Ind 199-13 12. Please consider that Rise Gold may eventually need a water right to pump and dispose of groundwater. Are you prepared to grant this water right, that is covered by the Public Trust Doctrine, to a private corporation?

Ind 199-14 Just because fractured rock aquifers are not currently well understood, does not mean that the cumulative effects of groundwater depletion are not significant. The fact that they are **not** well understood, raises this issue to a significant risk that currently has no mitigation.

Thank you for considering my comments.
Sincerely,
/s/ Dianna Suarez
suareztribe@yahoo.com

INDIVIDUAL LETTER 199: DIANNA SUAREZ

Response to Comment Ind 199-1

The commenter provides an estimate of the value of water which will be discharged to South Fork Wolf Creek and asserts that the project will take this water away from the community. However, the groundwater which would be pumped from the proposed underground mine and treated at the surface is not currently available for use by surface users, as it is far deeper than groundwater wells in the project area. As discussed on page 10 of Appendix N of the DEIR, the proposed project will have a surplus of water from the natural groundwater flow into the ground workings. Once the initial dewatering is completed, approximately 1,224,000 gallons per day are estimated to be pumped to the surface on an on-going basis to maintain the dewatered mine. The groundwater consumed during operations is estimated to be 84,000 gpd. Notably, the water that will be discharged into South Fork Wolf Creek is not lost and can be used by downstream water users, including Nevada Irrigation District.

Economic benefits or water prices are not required to be analyzed by CEQA in the DEIR. Please see Master Response 2- Social and Economic Impacts.

Response to Comment Ind 199-2

Please see Response to Comment Ind 199-1. The water that will be discharged into South Fork Wolf Creek is not lost, as asserted by the commenter, and can be used by downstream water users, including Nevada Irrigation District. Please see Master Response 2- Social and Economic Impacts.

Response to Comment Ind 199-3

Groundwater dependent vegetation will not be significantly impacted by the project and therefore no restoration is proposed. Please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 199-4

The commenter asks what the cumulative impacts to the Bear River Watershed would be of 49,000-acre -feet of groundwater deficits. The South Fork Wolf Creek is a tributary to Wolf Creek and Wolf Creek is a tributary to the Bear River. As discussed on pages 4-8-65 and 4-8-65 of the DEIR, mine dewatering is estimated to reduce baseflow in South Fork Wolf Creek by up to as 0.1 cfs and in Wolf Creek by up to 0.75 cfs. During maintenance dewatering, 1.9 cfs would be added to the baseflow of South Fork Wolf Creek. Therefore, the baseflow in Wolf Creek and the Bear River would increase by approximately 1 cfs and the project would not create an impact from groundwater deficits, cumulative or otherwise, to the Bear River watershed.

Response to Comment Ind 199-5

The commenter asks for a risk assessment related to drier landscapes and increased wildfire from groundwater removal. As stated on page 4.13-21 of the DEIR, the dewatering of the mine would not affect the available moisture for vegetation in the project area because the existing depth to groundwater is already below the typical rooting depths in higher topographic areas while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels. Please also see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 199-6

The commenter asserts that the Bear River is impacted from legacy mining pollution including arsenic, and asks for an assessment of risk to Bear River from the project's pollutants. Please see Master Response 35 - Discharge to South Fork Wolf Creek. The DEIR analyzes water quality impacts to South Fork Wolf Creek and Wolf Creek from the project, which flow into the Bear River. (see DEIR, Chapter 4.8.) The Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Plan. The Basin Plan at page 2.3 states that the "…beneficial uses of any specifically identified water body generally apply to its tributary streams." The Basin Plan does not specifically identify beneficial uses for South Fork of Wolf Creek but does identify present and potential uses for the Bear River, to which the South Fork of Wolf Creek and Wolf Creek are tributary. As discussed on page 4.8-31 of the EIR, the beneficial uses of Bear River and South Fork Wolf Creek are identical and therefore the potential downstream impacts to the Bear River are already analyzed in the DEIR.

Response to Comment Ind 199-7

The commenter asks whether the applicant will pay for water quality monitoring in Bear River. Water monitoring requirements will be specified in the Notice of Applicability for the water discharge. Please see Master Response 35 - Discharge to South Fork Wolf Creek. It is unlikely that water monitoring in the Bear River would be required, as the discharge from the project is far upstream of Bear River, in the South Fork Wolf Creek, and monitoring points would likely be placed closer to the discharge point. Any required water monitoring would be paid for by the applicant.

Response to Comment Ind 199-8

The commentor asks what the response time to enforcement would be if water quality monitoring determines that mine runoff exceeds acceptable levels of pollution.

Mitigation Measure 4-8-1(b) requires that prior to commencement of construction activities, the applicant shall submit a Notice of Intent (NOI) to the Central Valley RWQCB for coverage under the Construction General Permit applicable for any site on which construction is to occur, and prepare a Construction Stormwater Pollution Prevention Plan (C-SWPPP) and reporting requirements. The SWPPP must be complied with until such time as terminated as a result of the completion of construction and permanent site stabilization or until an Industrial SWPPP becomes applicable to the site pursuant to Mitigation Measure 4.8-1(c). Mitigation Measure 4.8-1(c) requires that prior to commencement of operations at the Brunswick Industrial Site, the applicant shall submit a Notice of Intent (NOI) to the Central Valley RWQCB for coverage under the Industrial General Permit for the Brunswick Industrial Site and prepare an Industrial Stormwater Pollution Prevention Plan (I-SWPPP).

Any water quality monitoring requirements and reporting requirements would be specified in the C-SWPPP and I-SWPPP. The response and response time to enforcement would be determined by the Central Valley RWQCB.

In addition, as discussed in Master Response 35 – Discharge to South Fork Wolf Creek, a Notice of Applicability (NOA) for the water discharge into South Fork Wolf Creek is required by Mitigation Measure 4.8-1(a). As stated in the mitigation measure, the owner shall be required to submit quarterly monitoring reports to the Regional Water Quality Control Board. Upon receipt of the complete Notice of Intent (NOI), if the discharge is deemed eligible for coverage under the General Order, the CVRWQB will issue a Notice of Applicability (NOA). The NOI shall include evaluation

of potential constituents of concern and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals. The NOA will specify monitoring and reporting program requirements. All NPDES permits are required to specify requirements for recording and reporting monitoring results. General monitoring provisions of the General Order require that samples taken for the purpose of monitoring be representative of the monitored activity. Records of monitoring must be kept and maintained and reports to the CVRWCB quarterly. Any noncompliance which may endanger health or the environment must be reported orally within 24 hours from the time the Discharger becomes aware of the circumstances. A report shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances. If the discharge is not deemed eligible for coverage under the General Order, the mine operator would need to apply for project-specific waste discharge requirements to achieve water quality that meets applicable water quality standards; however, it is expected that the discharge will qualify for coverage under the General Order based on the available industry standard methods to reduce iron and manganese (and potentially ammonia and arsenic) and the existing use of the General Order for the nearby Empire Mine and North Star Mine water discharge.

Response to Comment Ind 199-9

The impact to groundwater in private parcels in the mine area has been extensively analyzed in the DEIR. Please see Chapter 4.8 of the DEIR and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 199-10

Rise Gold owns subsurface mineral rights and has the right to dewater the underground works to access the valuable minerals subject to a permit from the County. Moreover, Rise Gold has appropriate water rights on its properties.

Response to Comment Ind 199-11

The public trust doctrine applies to navigable waters, but not to groundwater in subsurface mine works.

Response to Comment Ind 199-12

As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to. The beneficial uses for water in South Fork Wolf Creek are provided on page 4.8-31 of the DEIR. Rise Gold owns subsurface mineral rights and has the right to dewater the underground works to access the valuable minerals subject to a permit from the County. Moreover, Rise Gold has appropriate water rights on its properties.

Response to Comment Ind 199-13

Rise Gold owns subsurface mineral rights and has the right to dewater the underground works to access the valuable minerals subject to a permit from the County. Moreover, Rise Gold has appropriate water rights on its properties. The public trust doctrine applies to navigable waters, but not to groundwater in subsurface mine works.

Response to Comment Ind 199-14

The commentor suggests that fractured rock aquifers are not well understood. Please see Master Response 14 - Adequacy of Groundwater Model. The commenter also appears to allege that there is no mitigation provided with regard to groundwater depletion. However, the DEIR requires implementation of Mitigation Measures 4.8-2(a), 4.8-2(b) and 4.8-2(c) to mitigate water supply

impacts related to dewatering. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Individual Letter 200

From: Natana Spohler
To: BOS Public Comment
Subject: the proposed mine
Date: Monday, March 21, 2022 2:26:34 PM

Dist 4

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Dear Nevada County Supervisors,

Ind 200-1 My name is Diedra Spohler and I live on Lake Forest Drive in Penn Valley, District 4. I have lived in our beautiful county for over 20 years now and consider myself very fortunate to have discovered such a special and beautiful location.

I am very concerned about the proposed mine for the following reasons:

Ind 200-2 1. Mines are known for being destructive to their surrounding environment. This one would be close to the center of Grass Valley not in a far off isolated location and would disturb residences with the noise pollution.

Ind 200-3 2. It would lower the water table during a time of drought when water is already a rare and precious commodity.

Ind 200-4 3. The increased traffic and pollution from the diesel trucks would make this a less desirable location to live in.

Ind 200-5 4. Rise Gold has never opened a mine and has never made a profit. Their current CEO's prior venture polluted the local environment, went bankrupt and left the local community. This does not inspire trust that they care about their impact nor that they are willing to take responsibility for cleaning up the messes they make.

Ind 200-6 5. It is likely that the mine would discourage tourism and also make our county less attractive to high tech businesses and decrease property values. The current environmental review process doesn't include any analysis or study of the economic impacts. Please follow due diligence and include an economic analysis in the Draft Environmental Impact Report (DEIR).

Ind 200-7 Don't allow our community to be harmed!

Thank you,
Diedra Spohler

INDIVIDUAL LETTER 200: DIEDRA SPOHLER

Response to Comment Ind 200-1
The comment is an introductory remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 200-2
Please see Master Response 1.

Response to Comment Ind 200-3
Please see Master Response 16.

Response to Comment Ind 200-4
Please see Master Response 1.

Response to Comment Ind 200-5
Please see Master Response 3.

Response to Comment Ind 200-6
Please see Master Response 2.

Response to Comment Ind 200-7
The comment is a closing remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 201

March 30, 2022

Dear Board of Supervisors,

I appreciate the opportunity to provide input on the Idaho-Maryland Mine DEIR. Thank you for taking the time to consider my comments.

My wife and I have lived on Cedar Ridge Dr. since 2008. Some of the characteristics that attracted us to this area include: natural beauty of the area, cultural resources, responsible government, and volunteering opportunities. We are both active in the community as volunteers, donate thousands every year to local charities, we buy local and use local contractors for all work done on our property. We will move if this project is approved.

Ind 201-1

Every community member commenting on the DEIR has unique experience and background, and hopefully that is taken into consideration by those reviewing the DEIR comments. I have over 30 years experience as an engineering manager and have successfully scoped and managed several multi-million dollar programs during my career. My point is I understand technical and financial risk and I have background scoping large projects.

I can also spot BS when I see it.

Rise Gold Corp's proposal to open Idaho Maryland presents a host of economic, quality of life, and ecological threats to our community. The DEIR has uncovered some of the issues we would face should this project be approved and in this letter I will be focusing on some of these concerns.

General observations:

Ind 201-2

- Out of date data used throughout the document. We understand it takes awhile to generate these reports. However, a lot of the data is four years old and does not reflect the changes our community is undergoing.

Ind 201-3

- The DEIR is reliant on reports commissioned by Rise Gold. Another set of experts should be used to generate unbiased reports. Peer review is not enough.

Ind 201-4

- The DEIR fails to address the Centennial site clean up effort that Rise has committed to do. It needs to be included in this DEIR since this DEIR is dependent on the clean up being done properly. The DEIR needs to be redone with the Centennial plans taken into account. Furthermore, this project shouldn't be approved until Centennial is cleaned up or there is at a least funding in place for the work.

1 Haislet DEIR Comments

Significant and Unavoidable Impacts Cited in DEIR

We've all seen the categories cited in the DEIR with "significant and unavoidable" impacts. The staff report did a good job of summarizing those sections. Here's my opinion:

Ind 201-5

4.1-2 Aesthetics
As noted in this section of the report, the tall structures that will be as much as 165 Ft. high and the tailing dump sites will alter the landscape in a very negative way. Brunswick road is a gateway to the county. Residents and visitors travel that road every day and would be subjected to these views.

I don't see a way around this issue, so based on this the DEIR should be rejected.

Ind 201-6

4.1-4 Aesthetics
As noted in this section of the report, this project would have "significant and unavoidable" cumulative impacts due to build out in the area. I strongly disagree with the assertion in the report that the Brunswick site is surrounded by industrial zoning, it is residential zoning. This error needs to be corrected as it is misleading to reviewers.

Ind 201-7

Also the section on lighting is incorrect. With the addition of facility lighting, trucks running until 10PM, employee traffic, etc., light pollution will increase dramatically. Those living near the mine will see it, those farther away will see fewer stars due to the light pollution.

Again, based on the results of this section, the project should be rejected.

Ind 201-8

4.10-1 Noise and Vibration

The report states that noise and vibration during construction of the pipeline would be "significant and unavoidable" impacts even after mitigation. In fact, this entire section glosses over the effect of noise and vibration on the surrounding neighborhoods. All the discussion about "growler" beepers, etc is not going to happen. In addition, Rise has no control over their contractors.

This section is one of my greatest concerns. We have a little road noise in the area, but not nearly the scale that the mine would impose on the neighborhood. Any noise over the current levels would be a nuisance and health risk. Trucks would be running 6AM-10PM so we would only be able to sleep between 10PM-6AM.

Our quality of life would go down, perhaps that is not considered an environmental impact?? Regardless, the community has concerns about the noise and vibration due to the mine operation and this needs to be looked at in detail.

Ind 201-9

4.12-1, 4.12-8, and 4.12-10 Transportation

The report states that the impact of traffic would be "significant and unavoidable" on several intersections in the area. This is true! Furthermore, the report understates the impact because it doesn't take into account vendor traffic, etc..

Based on results of the this section, the DEIR should be rejected.

Sections of DEIR that need more work

Ind 201-10 After reviewing the document I found the following sections that need to be addressed. As I've stated, my impression is that Raney and their consultants didn't take this document seriously, they should not have used the reports commissioned by Rise Gold.

4-3 - AIR QUALITY, GREENHOUSE GAS EMISSIONS, AND ENERGY

Ind 201-11 It is difficult to respond to this section due to the following issues:

1. Data presented in the DEIR is outdated, uses info from 2018.
2. **Ind 201-12** Yuba City was used as a location for some of the air quality data. Yuba City is not representative of Nevada County. It isn't part the Mountain Counties Air Basin (MCAB), either. This demonstrates that the team that prepared the DEIR is not familiar with our area.
3. **Ind 201-13** There is a lot of "boilerplate fluff" info presented (all about climate change, regulations, etc) that appears to be filler meant to increase the length of the document. IMO that could be in an appendix as it obscures the basic message that the project would make air quality worse.

Ind 201-14 **I do not believe Raney took this section seriously. It needs to be redone. Raney needs to use accurate air quality data and correct locations when evaluating the air quality impact on our community.**

Ind 201-15 Here's what is true: Air quality has been terrible in Nevada County for the past few years. Furthermore, our PM and Ozone levels often exceed acceptable levels. The truck and employee traffic will further reduce our air quality.

"Sensitive Receptors" on page 4.3-11 doesn't address the issues properly. First of all there are many elderly people living near the mine site and along the truck routes. Also, there are at least two pre-schools in Cedar Ridge that would be sensitive receptors.

Ind 201-16 Further more, the DEIR states in section 4.3-4 that the mine would have a "less than acceptable" result in the inefficient or wasteful use of energy. The mine would consume power equivalent to 5000 homes. How is that not wasteful?

4.4 - Biological Resources

Ind 201-17 My comment here is that the authors have not addressed the fact that there are many species of animals living in the Brunswick site area. For example, the authors state "The field surveys did not record any observations of deer". This is not factual, especially at the Brunswick site. There is currently a herd of deer in the area. Furthermore, bear, fox, and mountain lions live in the area. We have a saying in industry: "Show your work", meaning the report writer should explain how they arrived at the conclusions.

More work is needed in this section.

4.7-1 Hazards and Hazardous materials

Ind 201-18 The DEIR states that the level of significance after mitigation would be "Less than Significant". According to the DEIR, around 14 tons of explosives would need to be transported to the

Brunswick site every 14 days. 365 tons of explosives/year, equivalent to 30K tons over the life of the project.

In my opinion, the DEIR did not adequately address the risk of transporting so much explosive material through our community. For example:

- What would happen if one of the trucks detonated in transit?
- What is the risk to the surrounding area if explosives detonate at the job site before they are stored underground? I would expect at a minimum wildfire would be a concern.

Ind 201-19 On the subject of evacuation routes, the document incorrectly states: "Brunswick Road is considered a secondary evacuation route." For many residents it is the primary evacuation route. It is as if Raney didn't take a look the fact that many people live near the site. If the mine goes in the traffic from trucks and employees during an evacuation would be significant.

More work is needed in this section.

4.8 Hydrology and Water Quality

Ind 201-20 This section fails to adequately address the potential impacts to wells in the area. Past experience (North San Juan) has made clear that we simply do not know how the mine will impact wells. Since past experience shows that mine operators often go bankrupt, a substantial bond with a factor of safety of 2X need to be required from Rise.

Ind 201-21 The bottomline is that the claim only 31 homes would be impacted is a flawed premise. 100s of wells serving homes and business could be impacted according to other sources. The models used in the DEIR need to be reviewed and updating.

Ind 201-22 Furthermore, it makes no sense to pump millions of gallons from under ground when we are in a long term drought. We will be sending our water down the hill.

This entire section should be redone with current data.

4.9 - Land Use and Population and Housing

Ind 201-23 Table 4.9-1 and Figures 4.9-1, 4.9-2, and 4.9-3 illustrate the problem with the Brunswick site clearly: The proposed mine is surrounded by low density residential zoning. Furthermore, homes are in all those areas. Hard rock mining is not compatible with this location. The fact that the zoning would need to be changed to accommodate the mine makes this clear.

Ind 201-24 On Page 4.9-9 Table 4.9-5 presents Housing Vacancy rates. Again, this info is at least 3 years old. Vacancy rates are lower and prices are going up. This needs updating with current information.

Ind 201-25 Page 4.9-25 section 4.9-3 (Population growth) glosses over the impact on population growth in the area. Here again the authors of the DEIR show ignorance about Nevada County by claiming 22% vacancy rate. They lump in the 51% vacancy of the Truckee numbers (those are probably air B&Bs) in there and the data is over 3 years old.

This section needs to be redone.

4.11 - Public Services and Utilities

Ind 201-26 The project would require the county to change the Brunswick site zoning from light industrial to light industrial with mineral extraction. The surrounding area is zoned as residential. It is obvious to even casual observers that hard rock mining is not compatible with the surrounding area. It wold be a bait and switch for those of us that bought here with the understanding that mineral extraction was prohibited.

Thus the zoning change should not proceed.

4.13 - Wildfire

Ind 201-27 As noted in the DEIR, the mine will be a source of ignition (welding, trucks, explosives, etc). So the mine would add wildfire risk to the community. We happen to live above the Brunswick site and if a fire started it would no doubt impact our neighborhood.

I feel this section doesn't adequately address the risk to the community.

Ind 201-28 I am sure many more qualified organizations and individuals will comment on this DEIR. All I can provide is my own opinion. My hope is that we can close this matter quickly so our community can focus on growing our economy in ways that don't harm the environment, lower property values, and impact our quality of life. Once this attempt to open the mine is rejected, the property should be re-zoned to prohibit mining.

Thank you again for taking the time to read my comments. You have a lot of responsibility on your shoulders, I trust you will make the right decision for the community.

Ind 201-29 Regards,

Don Haislet

P.O. Box 1462
Cedar Ridge, 95924

INDIVIDUAL LETTER 201: DON HAISLET

Response to Comment Ind 201-1
This comment is introductory in nature. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 201-2
The commenter states that out-of-date data is used in the DEIR but does not specify which data and how it affects the analysis of the DEIR. No specific response is possible – Please see Master Response 1.

Response to Comment Ind 201-3
The commenter states that reports commissioned by the Project Applicant are biased and that independent, third-party consultants should also produce reports. The DEIR incorporates expert opinion from consultants not hired by the Project Applicant and peer review of technical reports was conducted by consultants hired by the County including Raney Planning and Management, Madrone Ecological Consulting, ECM, West Yost, Saxelby Acoustics, and TJKM. The commenter provides no information as to why they believe the peer review is insufficient and therefore no response is provided. CEQA also allows a lead agency to accept a DEIR prepared by the Project Applicant or Project Applicant's consultant. (CEQA Guidelines, § 15084(d)(3).) In this case, the DEIR was not prepared by the Applicant, but rather certain technical information that was independently peer-reviewed by the County's team of consultants.

Response to Comment Ind 201-4
The commenter states that the DEIR fails to address the Centennial Industrial Site cleanup. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 201-5
The commenter states that the County should not approve the project based on the significant and unavoidable aesthetic impacts. Aesthetics has already been determined to be a significant and unavoidable impact, in part due to the visibility of the proposed headframe. (DEIR, p. 4.1-15.) The commenter's concerns have been forwarded to the decisionmakers.

Response to Comment Ind 201-6
The DEIR does not assert that the Brunswick site is surrounded by industrial zoning. Chapter 4.1 of the DEIR states there are existing industrial sites within the vicinity of the project location. (DEIR, p. 4.1-22.) The commenter is also referred to Figure 3-5 (Existing General Plan Land Use Designations), Figure 3-6 (Existing Zoning Designations), and Table 3.2 (Surrounding Land Uses and Closest Receptors) of the DEIR.

Response to Comment Ind 201-7
The commenter states that the DEIR's discussion of aesthetic impacts is incorrect because the addition of vehicle and facility lighting will dramatically increase light pollution. Vehicle lights have been analyzed in the DEIR. As stated on page 4.1-23 of the DEIR, all work at the Centennial Industrial Site would be done between 6:00 AM and 10:00 PM. Hauling and dumping of engineered fill at the Centennial Industrial Site would occur between 6:00 AM and 10:00 PM. Placement, compaction, and grading of the engineered fill would occur between 7:00 AM and 3:30 PM. The project would not include the installation of any new lighting elements on the

Centennial Industrial Site. Lighting during nighttime hauling and dumping of engineered fill would be limited to haul truck headlights. On-site mobile equipment would not include the addition of substantial reflective surface that would affect the surrounding area. Therefore, the potential for the project to create a new source of substantial light or glare that would adversely affect day or nighttime views in the vicinity of the Centennial Industrial Site would be less than significant. With regard to the Brunswick Industrial Site, vehicles would be entering and exiting the site mostly during daytime hours, considering shift changes at 7:00 AM, 3:30 PM, and 7:00 PM. While hauling of materials off-site would occur until 10:00 PM, which would add light from vehicle headlights, such lighting sources would not result in substantially increased light pollution relative to existing vehicle traffic on local roadways. Placement, grading, and compaction of engineered fill at Brunswick Industrial Site would not occur during nighttime hours.

Facility lighting has been analyzed in the DEIR. Please see Pages 4.1-24 through 4.1-29. As stated in the DEIR, based on the photometric plan prepared for the Brunswick Industrial Site, the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles, and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

Response to Comment Ind 201-8

The commenter states that the DEIR understates the noise impacts of the project but does not state how the DEIR is inadequate. Noise impacts from the project, with the exception of construction noise related to the installation of the potable water pipeline, have been found to be less than significant after mitigation. (DEIR, p. 4.10-31.) The commenter states that certain mitigation measures (e.g., “growler” beepers for trucks) will not be implemented. On the contrary, Mitigation Measure 4.10-1 requires all mobile equipment to be fitted with broad-band “growler” type back-up warning devices rather than the conventional “beeper” devices. All mitigation measures are included in the mitigation monitoring and reporting program (MMRP), which is included as Chapter 4 of this Final EIR. The MMRP would be adopted along with EIR certification, should the Board of Supervisors take these actions. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 - Operator Responsibility.

Response to Comment Ind 201-9

The commenter states that vendor traffic has not been considered in the DEIR. The commenter is incorrect; the DEIR accounts for vendor traffic and the impacts were found to be less than significant. (DEIR, p. 4.12-56. Table 4.12-7.)

Response to Comment Ind 201-10

The commenter states that DEIR should not have used consultants commissioned by the Project Applicant.

The DEIR incorporates expert opinion from consultants not hired by the applicant and peer review of technical reports was conducted by consultants hired by the county including Raney Planning and Management, Madrone Ecological Consulting, ECM, West Yost, Saxelby Acoustics, and TJKM. The commenter provides no information as to why they believe the DEIR is insufficient and therefore no response is provided.

Response to Comment Ind 201-11

The commenter states that out-of-date data is used in the DEIR but does not specify which data and how it affects the analysis of the DEIR. No specific response is possible – Please see Master Response 1.

Response to Comment Ind 201-12

The commenter states that the DEIR utilized Yuba City as a location for air quality data, which the commenter states is not representative of Nevada County. As stated on page 4.3-10 of the DEIR, because the Grass Valley station only monitors ozone (O3) and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project sites. The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity. Further, this information is not used to model the project's emissions, and thus, has no bearing on the findings of the analysis.

Response to Comment Ind 201-13

The commenter states that regulatory background information in the DEIR is only included to increase the length of the DEIR. The information provided in Chapter 4.3 of the DEIR is to provide information sufficient to evaluate the impacts of the project in accordance with CEQA Guidelines. It is not included in the DEIR in order to increase the length of the document.

Response to Comment Ind 201-14

The commenter states that Chapter 4.3 of the DEIR needs to be redone but provides no information of what deficiencies are present in the analysis. The commenter is referred to Chapter 4.3 of the DEIR and Response to Comment Ind 201-12.

Response to Comment Ind 201-15

The commenter mentions certain sensitive receptors, including elderly people living near the mine site and along the truck routes, as well as two preschools in Cedar Ridge. As discussed in Section 2.1 of the Health Risk Assessment, the cancer risk accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs). Accordingly, the HRA evaluates and reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations.

As stated on page 27 of the Health Risk Assessment (Appendix E1 of the DEIR), the maximally exposed individual residence (MEIR) would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Given that the Health Risk Assessment presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project, including the above-mentioned receptors, would have less exposure and consequently less potential health risk than the MEIR.

Response to Comment Ind 201-16

The commenter states that project would result in wasteful energy usage. As stated on page 4.3-88 of the DEIR, APM-AQ-1 and Mitigation Measure 4.3-1(b) would ensure that only high-efficiency off-road equipment is used during project construction, operation, and reclamation. Electrically powered equipment used on-site would primarily be served by grid-supplied electricity, which would originate from an increasingly renewably sourced mix of energy, and, if emergency power is required, the emergency generators would be Tier 4 Final compliant engines. On-road vehicles are required to meet stringent state and federal requirements related to fuel efficiency. All project vehicles would be required to comply with the existing requirements, which would ensure that on-road vehicles would be operated in an energy efficient manner. Accordingly, the proposed project

would not result in an inefficient, wasteful, and unnecessary consumption of energy, and the impact would be less than significant. (DEIR, p. 4.3-86.) Please also see Response to Comment Agcy 8-17.

Response to Comment Ind 201-17

The commenter states that the DEIR's biological surveys do not account for all of the species living in the area. The commenter is referred to Response to Comment Ind 585-18.

Response to Comment Ind 201-18

The commenter is concerned that the project's transport and storage of explosives could lead to an accident. Please see Master Response 10 – Explosives, Reagents, and Brunswick Fill. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 201-19

The commenter states that the DEIR incorrectly identifies Brunswick Road as a secondary evacuation route and not a primary evacuation route. As stated on page 4.7-11 of the DEIR, primary evacuation routes in Nevada County consist of the major interstates, highways, and principal arterials identified on the Nevada County General Plan Land Use Map. The routes designated on the General Plan Land Use Maps as minor arterial or major collector routes shall be considered secondary evacuation routes on a Countywide basis. These routes supplement the primary evacuation routes, and provide egress from local neighborhood and communities.

Response to Comment Ind 201-20

The commenter states that the DEIR underestimates the number of private wells that could be impacted by the project. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15- Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 201-21

The commenter states that the DEIR underestimates the number of private wells that could be impacted by the project. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15- Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 201-22

The commenter states that it is unwise to dewater the mine in light of the drought. The commenter is referred to Master Response 16 -Drought and Climate Change.

Response to Comment Ind 201-23

The commenter states that residential zoned parcels near the Brunswick site make the project unsuitable for the area. As discussed on page 4.9-16 of the DEIR, subsurface mining is allowed in all base districts, including the M1 base district, subject to approval of a Use Permit. Surface mining is allowed in the M1 base district and where the property is zoned ME.

Response to Comment Ind 201-24

The commenter states that the DEIR requires updated housing vacancy data. The vacancy rates shown in Table 4.9-5 of the DEIR are derived from the 2019 Nevada County Housing Element Update and is the most current information available for use in the analysis of the DEIR.

Response to Comment Ind 201-25

The commenter states that the DEIR inaccurately portrays vacancy rates in the County. The vacancy rates shown in Table 4.9-5 of the DEIR are broken down by area and 22.5% is the average vacancy rate for Nevada County. Vacancy rates range from 8% in Grass Valley and Nevada City to 51% in Truckee. This data, derived from the 2019 Nevada County Housing Element Update, is the most current information available for use in the analysis of the DEIR.

Response to Comment Ind 201-26

The commenter states that the project is not compatible with surrounding land uses. The potential incompatibilities resulting from mine operation (e.g., noise, dust) are evaluated throughout the technical sections of the DEIR. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 201-27

The commenter states that the DEIR inadequately addresses the project's effect on wildfire risk. As stated on page 4.13-22 of the DEIR, the incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis and Mitigation Measure 4.13-2 requires the applicant to submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during project construction, operations, and reclamation activities. Implementation of this mitigation measure would reduce the above potential impact to a less-than-significant level.

Response to Comment Ind 201-28

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 201-29

The commenter thanks the County for taking the time to review the comments within the letter. The comment is noted.

Individual Letter 202

From: Don Madden
To: Idaho MMEIR
Subject: My public comment is that it will be a MISTAKE to reopen that mine in town. I want to go on record.We oppose the opening of this mine. To degrade our town, our sweet little town, would be a very big mistake.
Date: Sunday, March 13, 2022 10:19:27 AM

Ind 202-1

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Sincerely yours, Don Madden and Gracie Robinson

Sent from my iPhone

INDIVIDUAL LETTER 202: DON MADDEN AND GRACIE ROBINSON

Response to Comment Ind 202-1

Please see Master Response 1.

Individual Letter 203

From: kwvoors1@gmail.com
Sent: Sunday, April 3, 2022 3:44 PM
To: Matt Kelley
Cc: 'Don Davis'; 'Karen Voors'
Subject: Idaho Maryland Gold Mine Project

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Donald and Karen Davis
606 Long St.
Nevada City, CA 95959
dond@aja.com
kwvoors1@gmail.com

Mr. Matt Kelley
Senior Planner

Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617

Dear Sir,

I am a long-term resident of Nevada County, living most of the last 30 years in Nevada City. I am troubled by the consideration of a project with such a potential to degrade the quality of life in our town. I am against the mine project. With the potential of such mediocre returns to the community, I don't understand why such a project would even be considered.

Ind 203-1

During my time in Nevada County, I lived briefly in a community that allowed a major employer to build and staff a number of buildings. While the community was assured the infrastructure would be addressed for the increased traffic, agreements made as part of the installation did not cover the actual costs. The community was forced to spend millions to maintain its infrastructure.

I see no reason in the DEIR to believe this would not be the case with the IDAHO MARYLAND GOLD MINE PROJECT. In section 4.12-1 of "Project-Specific Impacts and Mitigation Measures", the DEIR says "However, even after mitigation, the project's impact to the Brunswick Road/SR 174 intersection would be significant and unavoidable." And its conclusion is as follows:

> **Conclusion** *Based on the above, under both Scenarios #1 and #2 the proposed project would increase traffic through three intersections already identified as operating unacceptably under Existing and EPAP Conditions. Thus, a significant impact to the Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive intersections would occur under the EPAP Plus Project Conditions.*

1

With such conclusions, I feel the project is unreasonable for our community and, in the least, requires legal assurances the community would not be required to maintain its infrastructure for the benefit of the applicant.

Respectfully Submitted,

Donald and Karen Davis

INDIVIDUAL LETTER 203: DONALD AND KAREN DAVIS

Response to Comment Ind 203-1

Please see Master Response 1. While the DEIR concluded that significant and unavoidable impacts would occur associated with level of service (LOS) at the Brunswick Road/Idaho Maryland Mine Road intersection, SR 174/Brunswick Road intersection, and the Idaho Maryland Mine Road/Centennial Drive intersection, according to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impacts.

Individual Letter 204

From: DONALD J GAGLIASSO <donaldgagliasso@comcast.net>
Sent: Wednesday, March 23, 2022 1:11 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org

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To: Matt Kelley

I am Donald Gagliasso at 14035 Diamond Court, Grass Valley 95945
We are one of the "30 wells" that will supposedly be impacted by this project.

I am opposed to the mine for all the usual reasons. I do have some questions if the mine is opened. **Ind 204-1**

1) Who is paying for the water when the wells run dry? I heard the mine is going to bring water up East Bennett but not sure who pays to supply it to the residents. Is it the retired fixed income residents? Is it Nevada County tax payers? Is it the Canadian Gold Mine who supposedly is going to make millions on the project?

2) I have been in construction trucking for over 55 years. The mine wants to haul 1500 yards a day. Is that 1500 loose yards or in place yards (big difference in load count)? Depending on what type of truck the mine uses that 75 to 150 loads a day. I would image the mine will use the most economical loading equipment. A good loading operator can load over 200 loads in 8 hours. Going to the Centennial site a truck should make 4 loads an hour so in an 8 hour day they would need +/- 5 trucks for an 8 hour shift. Why do we need 24 hour working permit? **Ind 204-2**

3) The mine hopes to send dirt to construction sites. What jobs in Nevada County need import? The jobs I see are either a balance site or an export site. If there is a construction site, is Nevada County going to let that job operate 24 hours a day 7 days a week? **Ind 204-3**

1

Ind 204-4 4) The only jobs that may need import would be in the valley. Since it takes an hour to get to Roseville in a car it will take longer for a truck. Most cities will not allow a construction site to work 24 hours a day, Saturdays are iffy and Sundays are not allowed. The only jobs that work at night are Cal Trans projects. Again why 24/7 work days? A contractor is lucky if they can work a 10 hour day. Is the County going to make the trucks use a designated truck route? A truck will only be able to haul 3 loads or less in an 8 hour day. That would be a minimum of 50 trucks a day leaving Nevada County with what kind of a traffic problem?

Ind 204-5 5) If the mine plans on hauling 500,000 yards a year, what happens to the dirt if there is no construction projects to accommodate them? Are there going to be piles of tailings left all over the site?

Ind 204-6 6)It the mine does haul to other construction sites owners are very leery of taking material that has certain contaminated materials even if they are within the States limits. I have had jobs where any arsenic dirt would not be allowed. They do not want to take the risk. So if Rise Gold cannot find a place to take the dirt where is it going to go?

Ind 204-7 7) Construction sites do not work in wet conditions and depending on the storm could take weeks to dry up. What is the mine going to do with the dirt if they cannot haul? The construction industry for dirt hauling has always planned on a 200 day work year. Again why 24/7 work hours?

There are two environmental specs on contaminated materials, residential jobs and commercial jobs. Residential jobs are more restrictive than commercial.

Ind 204-8 8)) As far as digging in the tunnels, unless the mine is using wheel barrels, an operator can dig 1500 yards in a 10/12 hour day depending on the material. Again why 24/7?

Ind 204-9 9) Rise Gold talks about using only tier 4 equipment. Two things are misleading with this statement. All off road construction equipment by State of California law must be tier 4. All on road trucks do not have a tier rating. Again by law they must be complying with a pollution spec from a specific year. Today I believe that all trucks must comply with a 2010 year engine or newer to operate and be licensed in California.

Ind 204-10 10) Just received a letter from Rise Gold about NID water. They said they will pay to have NID piped to our address. Is this only before they de-water or can we wait to see if our well is impacted by them and have it done after

2

losing our well? Why should Rise Gold pay our monthly water bill but not the person to whom we sell? How will that effect our selling price? Can we have Rise Gold pipe NID water to our location and not hook up to the service?

Donald Gagliasso
donaldgagliasso@comcast.net

INDIVIDUAL LETTER 204: DONALD GAGLIASSO

Response to Comment Ind 204-1
The commenter is opposed to the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter asks who will pay for NID service to the properties along East Bennett Road identified in the DEIR. As stated in Mitigation Measure 4.8-2(c) of the DEIR, prior to commencement of initial mine dewatering, the Project Applicant shall implement the Well Mitigation Plan by connecting 30 properties in the East Bennett area to the NID potable water system. The Project Applicant shall be responsible for fully funding reimbursement for water charges, for monthly fixed service charges and use of up to 400 gallons per day, will continue until the sooner of the following occurs: 1) the property is sold by the owner after the NID connection is accomplished and paid for by Rise; or 2) the property is annexed into the City of Grass Valley.

Response to Comment Ind 204-2
The commenter questions the number of truck trips necessary to transport the engineered fill. As stated on page 3-28 of the DEIR, the average transport of engineered fill will be 1,000 tons per day or 365,000 tons per year. A maximum transport rate of up to 2,000 tons of engineered fill per day is required to make up for periodic weather or operational delays. Truck payloads will be approximately 20 tons per truck and therefore will require up to 100 round trips per day and an average of 50 round trips per day. As shown in Table 3-7 of the DEIR, trucking of engineered fill is proposed for 16 hours per day.

Response to Comment Ind 204-3
The commenter questions whether there will be a local/regional construction market for the engineered fill. The commenter is referred to Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 204-4
The commenter reiterates concerns with the project's ability to market engineered fill in the local/regional construction markets. The commenter also asks whether the DEIR identifies a specific trucking route, states that the trucking will cause traffic impacts, and questions the need for trucking 24 hours per day, 7 days a week. Regarding using engineered fill for the local/regional construction markets, the commenter is referred to Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets. The project also does not call for trucks to run 24/7. As shown in Table 3-7 of the DEIR, trucking of engineered fill is proposed for 16 hours per day. Trucking routes are shown in Figure 3-13 of the DEIR. Lastly, Chapter 4.12 (Transportation) analyzed traffic impacts with a maximum of 100 round trips per day and found the impacts to be less than significant after mitigation, with the exception of traffic at the SR 174 and Brunswick Road intersection, and Brunswick Road/Sutton Way, where impacts would be significant and unavoidable even with implementation of mitigation.

Response to Comment Ind 204-5
Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 204-6
Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 204-7

Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 204-8

The commenter asks why some of the project components will operate 24 hours a day, 7 days a week. This comment does not pertain to the adequacy of the DEIR. However, a reduced hours alternative where the Idaho-Maryland Mine would operate 12 hours a day was considered but rejected because the Alternative is not anticipated to reduce a significant project impact. (DEIR, p. 6-13–14.)

Response to Comment Ind 204-9

The commenter states the DEIR is misleading because it states that all off-road construction equipment will be required to utilize Tier 4 Final engines, despite the fact that the State already requires this. Regulations regarding diesel engines are discussed on page 4.3-23 of the DEIR. Contrary to the commenter's assertion, Tier 4 Final engines are not required for all off-road construction equipment in California.

Response to Comment Ind 204-10

The commenter asks when NID water service would be connected to the property and why the Project Applicant will not pay for a subsequent purchaser of the Property. As stated in Mitigation Measure 4.8-2(c) of the DEIR, prior to commencement of initial mine dewatering, the Project Applicant shall implement the Well Mitigation Plan by connecting 30 properties in the East Bennett area to the NID potable water system. As stated in the Well Mitigation Plan (Appendix K.9 of the DEIR), it is unlikely that the reduction in water column of wells in the E. Bennett area will make these wells unusable. Therefore, property owners may decide to retain and continue using their water wells.

The commenter states that the applicant should pay for water for any parcel connected to NID water supply for the life of the mine, even after the parcel is sold. The Well Mitigation Plan (Appendix K.9 of the DEIR) takes a conservative approach and presumes that an owner who decides to connect to the NID system has been impacted by and at the fault of the mining operation, even if no impact to groundwater well supply has occurred. As such, the Well Mitigation Plan was designed to be even more conservative than Nevada County General Plan Policy 17.12, which requires an impact as a prerequisite to the obligation to pay for water, which policy states "If it is determined that the operator is at fault, impacted owners shall be compensated by the operator." A new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID's water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy.

Individual Letter 205

From: Donn Carlson <donncarlson51@gmail.com>
Sent: Sunday, April 3, 2022 7:34 AM
To: Idaho MMEIR

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Ind 205-1

No on the mine. With the drought, this not a time to be pumping ground water. How can you hold rise gold accountable to clean up their mess, after they declare bankruptcy? No bond could be large enough.

Donn Carlson
Nevada county voter

1

INDIVIDUAL LETTER 205: DONN CARLSON

Response to Comment Ind 205-1

Please see Master Responses 1 and 3, as well as Master Response 16.

Individual Letter 206

April 2, 2022

LETTER TO BOARD OF SUPERVISORS OPPOSING REOPENING IDAHO-MARYLAND MINE

Dear Board of Supervisors:

Ind 206-1 I am not a scientist or an expert of any kind in environmental matters. I have read the draft EIR and the CEA Foundation's response. While the latter certainly represents, at the very least, a difference of opinion regarding the potential environmental impact of reopening the Idaho-Maryland mine, the bottom line for me is that I see VERY LITTLE potential benefit to the Grass Valley community versus a GREAT DEAL OF POTENTIAL RISK.

Ind 206-2 The regional drought and water issues alone cause me enough concern to SAY NO to reopening the mine. This is a long-term commitment: 80 years. Climate change even now is inflicting untoward and unexpected consequences in Nevada County. If the extreme draught conditions continue – and there is nothing to say that they won't – water will become a scarce commodity. Then what?

Ind 206-3 At this point, I endorse the findings of the CEA Foundation. Air pollution, noise pollution, water pollution and dumping of harmful substances are all issues that will affect not only the health of human beings and other creatures living in the Grass Valley area, but also many other aspects of quality of life. Clearly, property values will not be enhanced by the close proximity of a gold mine operating 24 hours a day, although that is of less concern to me than the human impact.

Ind 206-4 Reopening the mine may look like a quick fix to some who are decrying the loss of income from growing marijuana, for example. But such notions are simply short-sighted and lack vision for the future. This is step backward into a past that resulted in all of the detriments folks are concerned about. A self-serving ERI by a company whose reputation is already highly questionable and has no incentive to do any more than the meet the minimum standards of mitigation, is no substitute for the creativity needed to develop new industries to carry us forward.

PLEASE SEE THE ARTICLE BELOW:

https://www.aol.com/disaster-american-west-could-face-090023596.html

Ind 206-5 Sincerely,

Donna Peizer
347 Horizon Circle
Grass Valley, CA 95945
dpeizer@aol.com
Phone: 925-451-5698

INDIVIDUAL LETTER 206: DONNA PEIZER

Response to Comment Ind 206-1
The comment is an introductory remark and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 206-2
Please see Master Response 16.

Response to Comment Ind 206-3
Please see Master Responses 1 and 2.

Response to Comment Ind 206-4
Please see Master Response 3.

Response to Comment Ind 206-5
The referenced article refers to climate change in the American west, and does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Individual Letter 207

From: Donna Taggart <donnataggart@icloud.com>
Sent: Monday, April 4, 2022 4:02 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Proposed Rise Gold Mine

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To The Nevada County Planning Commission:

I am writing to express my opposition to the proposed Rise Gold Mine. Although I am not an expert I realize how much impact this operation will have on our community for years to come.
I am especially concerned about the environmental impacts. Although the Draft Environment Impact Report is trying to address mitigation measures to all the environmental problems this operation will create I don't believe all the negatives can be addressed. As an example, the depletion of the water table (especially during a drought) with the solution being to put some residents on NID water is hardly a solution. The water loss will affect residents elsewhere and the Wolf Creek and other streams.

Ind 207-1

There is so much more possible pollution to water, air quality, noise levels, and traffic.
Please consider how this will affect quality of life for all residents in our community including wild life and plant life. We all need clean air, water and peace where we live.

Thank you for your help and consideration.

Donna Taggart
638 Zion St.
Nevada City, CA 95959
donnataggart@icloud.com

Sent from my iPad

INDIVIDUAL LETTER 207: DONNA TAGGART

Response to Comment Ind 207-1

Please see Master Response 1, as well as Master Response 16.

Individual Letter 208



Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

March 12, 2022

Subject: Comments on draft EIR for the Idaho-Maryland Mine Project (State Clearinghouse No. 2020070378)

Dear Mr. Kelley,

Ind 208-1

From the first time I heard of the proposal to reopen this old mine my gut reaction was that this was the wrong project in the wrong place. Mining operations satisfy a necessary part of our industrial needs but putting an industrial drill and blast mining operation under and around our homes and businesses seems an obvious mismatch.

Although there are a number of good reasons to deny this project, I will focus on a few of the more onerous issues.

Dewatering - Wasting Potable Water

Rise Gold is proposing to pump (dewater) and discharge, into a nearby creek, 3.6 million gallons of ground water every day during their initial dewatering of the mine site. This will be a six month time period. After the first six months they intend to pump 1.2 million gallons of water per day thereafter for as many years as the mine produces profitable gold. They need to remove the water so they can get workers and equipment to the ore bodies.

Ind 208-2

According to the CA Legislative Analyst's Office the average water use in California is 85 gallons/person/day. So, during the initial 6-month dewatering phase of this project , Rise Gold will be pumping and dumping enough of our drinking quality ground water to supply 42,000 people with potable water every day. During the operational phase, which will go on indefinitely, enough water will be pumped to supply 14,000 people with potable water every day. This is more than the entire population of Grass Valley. This jaw dropping waste alone, of our most valuable resource, should disqualify this project from further consideration.

In a region where our rainfall and groundwater recharge are becoming more unpredictable every year, (Lake Oroville was unable to produce electricity last summer due to the lowest lake level ever recorded) the idea of discarding this large volume of precious drinking water, relied upon by many of our residents, so a foreign company can cash-in on a mineral resource, is obscene.

Dewatering - Effect on Residential Wells

Ind 208-3

The mining company has paid for a report that predicts dewatering will have a minimal effect on domestic wells. It is important that we understand that the modeling methods used by Rise Gold generate

yield will be predetermined to define "well damage". Extent/seriousness of measured well damage will trigger pre-determined remedies. Development of well monitoring program will be made an actionable condition of approval. Paid for by Rise Gold and managed by Nevada County Environmental Health Department.

- Rise Gold to provide financial securities, either bonds or cash account, to be used to rectify well damage identified by the well monitoring program. Nevada County will administer funding accounts and determine when use of funds are justified.

- This well monitoring program should allow any and all means to rectify well damage caused by Rise Gold, including installation of piped water systems, property buyouts or mining operational modifications.

Ind 208-4

I believe that we should reject this project. But if we don't, we need strong/no nonsense protections in place for our community. Rise Gold needs to back-up their claims that they will not pollute or damage residential and business properties with meaningful financial assurances on top of their promises and marketing puff.

Sincerely,

Doug Farrell, Nevada County Resident

INDIVIDUAL LETTER 208: DOUG FARRELL

Response to Comment Ind 208-1
Please see Master Response 1.

Response to Comment Ind 208-2
Potential impacts related to whether the proposed project would substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin are addressed under Impact 4.8-2 in Chapter 4.8, Hydrology and Water Quality, of the DEIR. As discussed therein, with the implementation of mitigation, impacts would be less than significant. In addition, an assessment of both project-level and cumulative impacts on potable water supplies is included in Chapter 4.11, Public Services and Utilities of the DEIR. As noted on page 4.11-50, notwithstanding the potable demand of 26.4 acre-feet per year associated with the project, the proposed project would be a net contributor of water to the NID water system as a result of the project's discharge of treated mine dewatering water to South Fork Wolf Creek (850 gpm or about 1,371 ac-ft/yr).

For further detail regarding groundwater related to drought and climate change conditions, see Master Response 16.

Response to Comment Ind 208-3
Please see Master Responses 14 and 15.

Response to Comment Ind 208-4
Please see Master Responses 1 and 3.

Individual Letter 209

From: Douglas Haussler <tenfishhaussler@att.net>
Sent: Saturday, April 2, 2022 4:52 PM
To: Idaho MMEIR
Subject: Rise Grass Valley and the IM mine

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Ind 209-1

Having been around here since the 1960's I have seen a whole lot of what was attractive about this area change for the worse. Unfortunately reopening the Idaho Maryland mine would be yet another polluting eye sore with more traffic, noise and potential water issues for any one in the area.
I encourage the commission to stand behind the majority of the residents in NOT Approving the reopening of the mine.
Best Regards, Doug Haussler
(home owner in the Greenhorn road area)

INDIVIDUAL LETTER 209: DOUGLAS HAUSSLER

Response to Comment Ind 209-1

Please see Master Response 1.

Individual Letter 210

Matt Kelley, Senior Planner
NC Planning Department
950 Maidu Ave. Suite 170
Nevada City, Ca 95959

March 15, 2022

Dear Nevada County Board of Supervisions,

Ind 210-1 I am writing this letter in opposition to the reopening of the Idaho-Maryland Mine. I was raised in Grass Valley and my husband and I are registered voters here in Nevada County and we are deeply concern about Rise Mining Company intentions.

We have a number of concerns and here is why we are opposed to the reopening of the mine: The depletion of our well water. We live on Greenhorn Road, just one mile from the mine site. The real possibility that we could lose or end up with contaminated water is very real.

Ind 210-2 Traffic. What a traffic nightmare it will be if the planned 100 trucks coming and going 24/7 comes to fruition, let alone the damage to our roads. The congestion for people going to work and school will be horrendous, besides the potential of accidents. This will cause significant traffic issues on East Bennett St, Brunswick Road and Hwy 174.

Ind 210-3 We are also concerned about the Greenhouse gases and noise pollution that mining will produce.

Ind 210-4 Keep our county an area that people want to live in. Clean living, water, air and less traffic. Is the pursuit of gold really worth the environmental destruction? The real potential for significant and unavoidable auto accidents with 20 ton trucks and the cars and school buses that travel this route is a valid concern for everyone.

Ind 210-5 We believe that gold being removed by a foreign company who has no interest in our community should be avoided at all costs and ask the everyone vote NO to Rise Mining Company.

Sincerely,
Ed and Lynette Cepeda
13663 Greenhorn Road
Grass Valley, CA 95945

INDIVIDUAL LETTER 210: ED AND LYNETTE CEPEDA

Response to Comment Ind 210-1
Please see Master Response 1.

Response to Comment Ind 210-2
Regarding concerns about increased traffic resulting from the proposed project, please refer to Chapter 4.12, Transportation, of the DEIR. As discussed on page 4.12-67 of the DEIR, all segments along Brunswick Road and E. Bennett Road would continue to operate at LOS D or better under EPAP Conditions, while the SR 174 segment would continue to operate at LOS E. However, the proposed project would have minimal effect on the segment of SR 74 from EPAP Conditions. As such, the DEIR concluded that impacts to study roadway segments under the EPAP Plus Project Condition would be considered less than significant.

Response to Comment Ind 210-3
Please see Master Response 1.

Response to Comment Ind 210-4
The DEIR addressed impacts regarding whether the project would substantially increase hazards to vehicle safety under Impact 4.12-6, and concluded that with Mitigation Measures 4.12-6(a) through 4.12-6(f), a less-than-significant impact would occur. Therefore, impacts related to hazardous roadway conditions were adequately addressed in the DEIR.

Response to Comment Ind 210-5
Please see Master Response 3.

Individual Letter 211

From: BOS Public Comment
To: Matt Kelley; Brian Foss; Caleb Dardick
Subject: FW: Against the mine
Date: Tuesday, March 8, 2022 7:38:14 AM

Dist 1

From: Ed Suchow <gv_eq@yahoo.com>
Sent: Monday, March 7, 2022 12:10 PM
To: BOS Public Comment <BOS.PublicComment@co.nevada.ca.us>
Subject: Against the mine

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Ind 211-1

My wife and myself are opposed to the Idaho Maryland mine opening. In over 20 years I have never seen this community so united against a common cause. All you have to do is pick up our local newspaper every day to they to see someone writing more eloquent than I about the dangers to our community and lifestyle. Pick any of the number of reasons the writers have expressed to the newspaper against this operation opening. Any one of them would be a good reason to stop this project. Please consider the downside risk to our community and do not ignore the passionate citizens, especially the ones that have a personal stake in this.
Thank you.
Ed Suchow. 530 277 2201
Sheryl Zimmerman 530 277 5350

Sent from Yahoo Mail on Android

INDIVIDUAL LETTER 211: ED SUCHOW

Response to Comment Ind 211-1

Please see Master Response 1.

Individual Letter 212

From: Ed Suchow
To: Idaho MMEIR
Subject: Against the mine
Date: Monday, March 7, 2022 9:39:16 AM

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Ind 212-1

I am opposed to the Idaho Maryland mine opening. In over 20 years I have never seen this community so united against a common cause. All you have to do is pick up our local newspaper every day to they to see someone writing more eloquent than I about the dangers to our community and lifestyle. Pick any of the number of reasons the writers have expressed to the newspaper against this operation opening. Any one of them would be a good reason to stop this project. Please consider the downside risk to our community and do not ignore the passionate citizens, especially the ones that have a personal stake in this.
Thank you.
Ed Suchow. 530 277 2201

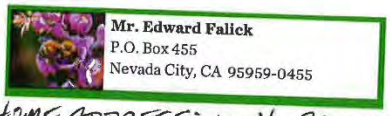
Sent from Yahoo Mail on Android

INDIVIDUAL LETTER 212: ED SUCHOW

Response to Comment Ind 212-1

Please see Master Response 1.

Individual Letter 213



HOME ADDRESS: 110½ BOULDER ST. NEV. CITY
530-265-2784



TO
MATT KELLEY, SENIOR PLANNER
NEVADA COUNTY PLANNING DEPARTMENT

Ind 213-1

SIR:
RE: THE IDAHO-MARYLAND MINE PROJECT:

THIS MINE WOULD BE A DISASTER FOR THE COMMUNITY, THE ENVIRONMENT AND THE QUALITY OF LIFE IN NEVADA COUNTY.
WE DEFINITELY OPPOSE THIS OPERATION.

Edward Falick (EDWARD FALICK) 530-265-2784

INDIVIDUAL LETTER 213: EDWARD FALICK

Response to Comment Ind 213-1

Please see Master Response 1.

Individual Letter 214

Edward Falick
Box 455
Nevada City, CA 95959

3/5/22

RE: THE IDAHO - MARYLAND MINE PROJECT
ATT: MATT KELLEY

MATT:

I HAVE WRITTEN ABOUT THIS PROJECT BEFORE.
LET ME STATE AGAIN:
I DON'T WANT THIS PROJECT IN NEVADA COUNTY.
HERE ARE SOME REASONS:
ITS A LOUSY IDEA. IT WILL BE A RAPE OF
THE LAND NO MATTER WHAT THEIR PR. PROFESSED
IN THE MANY MAILERS I'VE RECEIVED.
THE DISRUPTION OF OUR QUIET AND LAID BACK
LIFE STYLE WILL BE IMMENSE WITH SEMIS
MOVING BACK AND FORTH 24/7. THE POLLUTION
TO THE ENVIRONMENT, ESPECIALLY OUR RIVERS
AND STREAMS THE NOISE, THE LACK OF
OVERSIGHT AND THE GENERAL DESTRUCTION
OF OUR LAND. WELLS AND SPRINGS ARE
ADVERSELY AFFECTED. WATER AND CLEAN AIR ARE
MORE VALUABLE THAN GOLD. A BAD IDEA ALL
AROUND.

Ind 214-1

Edward Falick
Linda Martinez

RECEIVED
MAR 08 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 214: EDWARD FALICK AND LINDA MARTING

Response to Comment Ind 214-1

Please see Master Response 1.

Individual Letter 215

From: Eileen Stutz
To: bdofsupervisors
Subject: Rise Grass Valley Inc.
Date: Friday, February 18, 2022 1:07:38 PM

Dist 3

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Ind 215-1

Please do not support the re-opening of the Idaho-Maryland Mine. Let's put the welfare of our beautiful county ahead of the greed of a few. The Grass Valley area has suffered enough from mine pollution over the decades. Those who cannot (or won't) remember the past are condemned to repeat it.

Thank you for your kind attention,
Eileen Stutz
P.O. Box 1332
Cedar Ridge, CA 95924
(530 274-1665

INDIVIDUAL LETTER 215: EILEEN STUTZ

Response to Comment Ind 215-1

Please see Master Response 1.

Individual Letter 216

From: EJ Sheffner <edsheffner@gmail.com>
Sent: Monday, April 4, 2022 3:57 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Comments on DEIR for Idaho Maryland Mine

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I am a tax payer in Nevada County and part time resident, although my family has resided in the county since the 1970's. My primary concerns about the DEIR are as follows:

Ind 216-1 • The report acknowledges that the operation of the mine will have an impact on environmental factors including air quality, water quality, traffic, noise etc, but it does not consider the cumulative impact of all those factors on the quality of life. The mitigation factors considered for each element of the report will, at best, reduce the impacts, but will not eliminate them. The cumulative effect of the fully mitigated impacts is not described or considered, and the final EIR should do so.

Ind 216-2 • The DEIR appears to rely on existing state and federal environmental regulatory agencies to assure that the mine operation meets the environmental standards established in the use permit(s) and that those agencies will take appropriate action in a timely manner to alter or shut down the mine operation if necessary. If that is the approach recommended it is likely to be inadequate and the final EIR should include more comprehensive and timely monitoring and enforcement mechanisms.

Ind 216-3 • The DEIR appears to assume that any environmental standard of the mine operation not met will be discovered quickly (if not immediately) and that corrective action will be taken. The report does not describe how that monitoring will occur or the potential impact should, for example, air quality or water quality standards be exceeded for weeks, months or longer.

Edwin Sheffner
13920 Miller Road
Nevada City
edsheffner@gmail.com

1

INDIVIDUAL LETTER 216: EDWIN SHEFFNER

Response to Comment Ind 216-1

As described on page 5-3 of the DEIR, CEQA Guidelines Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that adversely affect the environment. A discussion of cumulative impacts is provided in each of the technical Chapters of the DEIR, and further information regarding the cumulative analysis and the cumulative setting used within the DEIR is provided in Chapter 5, Statutorily Required Sections, of the DEIR. As such, cumulative impacts were adequately addressed within the DEIR.

Response to Comment Ind 216-2

Please refer to Master Response 1. Where a comment provides the opinion, preference, or observation of the commenter (e.g., opinions on the merits of the project that are unrelated to its environmental impacts), without substantiation, this is acknowledged for the record, and no further response is provided. All comments, whether substantiated by facts or simply reflecting the position of the commenter, will be considered by the County throughout this process.

Response to Comment Ind 216-3

Please refer to Master Response 1. As discussed under impact 4.3-1 in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR (see page 4.3-73), according to the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds (included as Mitigation Measure 4.3-1[b] below) would reduce project impacts to a less-than-significant level during all years of project construction, operations, and reclamation. Impacts to water quality are addressed in Chapter 4.8, Hydrology and Water Quality, Impact 4.8-1, of the DEIR. As discussed therein, all potential sources that could result in water quality degradation are proposed to be managed in a manner that would minimize potential water quality impacts. Furthermore, these activities would be regulated and monitored through permitting by the RWQCB, which would be required prior to the onset of mine dewatering and construction. Mitigation Measures 4.8-1(a) through 4.8-1(e) were included within the DEIR to ensure compliance with the aforementioned requirements.

Individual Letter 217

RECEIVED

Dist 3

FEB 24 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

February 22, 2022

To: The Nevada County Board of Supervisors

Re: Re-opening the Idaho Maryland Mine

I am writing to the Board to express my concerns about the plan to re-open the Idaho Maryland Mine property by a company calling itself Rise Grass Valley.

My family and I have lived in Nevada County for more than 40 years. Grass Valley has been our home and the community environment surrounding our place has been a good, positive space to raise our children and now our grandchildren.

The Environmental Impact Report has been published and widely distributed by Rise Gold, which now is naming itself, Rise Grass Valley . The report claims no significant impacts will occur to water, air quality, and the natural environment from noise or vibrations during mine operations. Where is the conversation about whether this type of business is appropriate for Nevada County? Where are the details on how long it will take this business to achieve the positive economic impact stated in their ads and brochures? What recourse does Nevada County have if operations don't proceed as proposed by the company?

Ind 217-1

Spending money to publish ads in The Union and sending brochures in the mail to generate support for their project has not been looked upon as a way to gain confidence. They are using the history of past mining of the Idaho Maryland Mine as a reason to accept the idea of a profitable repeat of the mine experience. There are legitimate concerns about correcting mistakes, cleaning up accidents, and acting responsibly in the wake of possible mismanagement of the project. The reputation of Rise Gold is not trustworthy.

This not a business that Nevada County needs or wants operating in our communities.

I ask that you vote **"no"** on this matter when it comes before you. The people of Nevada County will not be able to cast their vote except through your actions – so consider well your important responsibility of representing the voters.

We depend upon the Planning Commission and the Board of Supervisors to look after the best interests of the communities of Nevada County. This project does not further the goals stated by the Board of Supervisors.

Elaine Westfall 557 Blight Rd. Grass Valley 95945

Elaine Westfall

INDIVIDUAL LETTER 217: ELAINE WESTFALL

Response to Comment Ind 217-1

Please see Master Responses 1, 2, and 3.

Individual Letter 218

February 22, 2022

To: The Nevada County Board of Supervisors

Re: Re-opening the Idaho Maryland Mine

I am writing to the Board to express my concerns about the plan to re-open the Idaho Maryland Mine property by a company calling itself Rise Grass Valley.

My family and I have lived in Nevada County for more than 40 years. Grass Valley has been our home and the community environment surrounding our place has been a good, positive space to raise our children and now our grandchildren.

The Environmental Impact Report has been published and widely distributed by Rise Gold, which now is naming itself, Rise Grass Valley . The report claims no significant impacts will occur to water, air quality, and the natural environment from noise or vibrations during mine operations. Where is the conversation about whether this type of business is appropriate for Nevada County? Where are the details on how long it will take this business to achieve the positive economic impact stated in their ads and brochures? What recourse does Nevada County have if operations don't proceed as proposed by the company?

Ind 218-1

Spending money to publish ads in The Union and sending brochures in the mail to generate support for their project has not been looked upon as a way to gain confidence. They are using the history of past mining of the Idaho Maryland Mine as a reason to accept the idea of a profitable repeat of the mine experience. There are legitimate concerns about correcting mistakes, cleaning up accidents, and acting responsibly in the wake of possible mismanagement of the project. The reputation of Rise Gold is not trustworthy.

This not a business that Nevada County needs or wants operating in our communities.

I ask that you vote **"no"** on this matter when it comes before you. The people of Nevada County will not be able to cast their vote except through your actions – so consider well your important responsibility of representing the voters.

We depend upon the Planning Commission and the Board of Supervisors to look after the best interests of the communities of Nevada County. This project does not further the goals stated by the Board of Supervisors.

Elaine Westfall 557 Blight Rd. Grass Valley 95945

INDIVIDUAL LETTER 218: ELAINE WESTFALL

Response to Comment Ind 218-1

Please see Master Responses 1, 2, and 3.

Individual Letter 219

From: swoolman
To: Idaho MMEIR
Cc: swoolman
Subject: EIR Idaho-Maryland Mine Project
Date: Saturday, February 5, 2022 8:15:20 AM

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Hello Mr. Kelley,

I have waded through the Draft EIR for the Idaho-Maryland Mine proposal, the arguments against allowing the mine to go forward and the arguments put forth by Rise Gold in favor of their project.

And, have concluded that the many highly negative impacts and potential risks for an extremely long time outweigh any of the benefits to the community that the mine might have.

Ind 219-1

So..I suggest that the proposed mine use of the property be denied.

Thank You,

Elaine Whooley

20493 New Rome Road
Nevada City, CA 95959

As a side note... the use of the term, "no significant impact," in the EIR seems to be a very subjective, or at least limited, assessment in what should be an objective presentation of facts.

Ind 219-2

INDIVIDUAL LETTER 219: ELAINE WHOOLEY

Response to Comment Ind 219-1

Please see Master Response 1.

Response to Comment Ind 219-2

As discussed in Section 4.0.4, Determination of Significance, in Chapter 4.0, Introduction to Analysis, of the DEIR (see page 4.0-2), four categories of impacts were used for the project-specific impacts within the DEIR: no impact, less than significant, significant, and significant and unavoidable. The CEQA Guidelines require that the determination of significance be based on scientific and factual data. The specific criteria for determining the significance of a particular impact are identified within in each technical chapter of the DEIR, and are consistent with significance criteria set forth in the CEQA Guidelines, based on the professional judgment of the EIR preparers, or supported by substantial evidence in the record considered by the County as the CEQA Lead Agency. As such, the DEIR adequately addressed all impacts based on significance criteria set forth in the CEQA Guidelines.

Individual Letter 220

Ind 220-1

I do not support

I ~~support~~ re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for the next and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED

Name(s) Edna Cross

Address 12263 Appaloosa Ct FEB 25 2022 P 95949

Phone 530 268-4660

NEVADA COUNTY
BOARD OF SUPERVISORS

Email Address

INDIVIDUAL LETTER 220: ELALINA CUSS

Response to Comment Ind 220-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 221

From: Eli Duber <eli.duber@gmail.com>
Sent: Monday, April 4, 2022 5:01 PM
To: Idaho MMEIR

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Ind 221-1

Acid mine drainage is still prevalent in Wolf Creek today from mining activities that ceased decades ago. The "Reclaimed Condition" section (pg. 8-50) states that "Once mining is completed, dewatering ceases, and the underground workings are allowed to flood with groundwater, the same reducing conditions that occur under existing conditions within the mine workings would develop again, preventing oxidation of sulfide minerals". This statement neglects the fact that sulfide minerals will be exposed to air during the 80 years of mining operations. When dewatering ceases, acid mine drainage will inevitably reoccur.

1

INDIVIDUAL LETTER 221: ELI DUBER

Response to Comment Ind 221-1

The commenter states that acid rock drainage is still prevalent in Wolf Creek from historic mining and would reoccur once dewatering ceases. The commenter also states that oxidation would occur after the mine is dewatered and during the 80-year project, which would lead to acid rock drainage. It is important to note that acid rock drainage has not occurred from historic mining of the Idaho-Maryland Mine. (Master Response 9 – Historical Mine Waste at Centennial Site.) Although oxidation of sulfide minerals may occur after the dewatering process, carbonate minerals in the project host rock, would quickly neutralize any acid. (DEIR, p. 4.8-49; Appx. K.2, p. 13.) Further, mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive approval of Waste Discharge Requirements (WDRs) from the Central Valley Regional Water Quality Control Board (CVRWQCB) prior to the placement of cemented paste backfill (CPB). (see Mitigation Measure 4.8-1(d) relating to CPB and for engineered fill (barren rock and sand tailings) see Mitigation Measure 4.8-1(e)). The CVRWQCB will determine the appropriate method of rock testing for the purposes of developing WDRs. Please also see Master Response 8 – Mine Waste Characterization.

As discussed on page of Appendix K.2 of the DEIR, the restoration of the post-mining discharge through the drains would be comparable to existing conditions and, thus, not an impact under CEQA. (DEIR Appx. K.2, p. 109.) However, once the mine discharge from the drains resumed, compliance measures may be required by the CVRWQCB to address the Basin Plan, antidegradation, and other water quality standards. These measures might include sealing off areas of the underground workings that are the primary source of arsenic in the existing drain water, sealing the underground workings sufficiently to prevent seepage of water from the connected mine workings, obtaining an Individual NPDES permit upon closure, or treating of the mine water seeps after closure.

Individual Letter 222

From: Eli Ferrier
To: Idaho MMEIR
Subject: Idaho Maryland Mine statement
Date: Monday, April 4, 2022 9:50:29 AM

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Dear Senior Planner Matt Kelley,

Ind 222-1 I live in a neighborhood very near the mine site. I am about 2-3 miles away and in the wolf creek drainage. Our well is a shallow well (80ft deep) and my concerns about the impact of the proposed mine have not been assuaged by reading the EIR from Rise Gold company. The low number of wells that is stated would be affected by the massive hydrologic changes to the area would not include my home or my neighbors. Yet, following the basics of hydrology, It seems likely that my well would very likely be dewatered by a lowering of the water table due to the pumping proposed mine site.

Ind 222-2 I firmly believe that the mine is a foolish and short sighted venture that will lower property values and would be the final straw for born and raised locals, myself and my family, to finally give up on this place and move away. The impacts of noise and truck traffic in our rural neighborhood seem inescapable and these impacts, when coupled with the high stress of fire season, I would likely leave and take my two businesses with me.

Please stop this mine.

Many Thanks,

Eli Ferrier

CTE Instructor, Construction Technologies
Silver Springs High School
Grass Valley, California

eferrier@njuhsd.com
cell: 530.828.2136

"Be joyful, though you have considered all the facts." -Wendell Berry

INDIVIDUAL LETTER 222: ELI FERRIER

Response to Comment Ind 222-1

Please see Master Response 14 – Adequacy of Groundwater Model. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 222-2

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 223

From: Elise Piscopos Stupi
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org; ken stupi
Subject: Idaho-Maryland Mine DEIR Comments
Date: Sunday, April 3, 2022 1:04:49 PM

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Dear Mr. Kelley,

Ind 223-1 My husband, Ken, and I have been residents of the Wawona Madrono subdivision of Grass Valley for over 5 years. Our house is located just outside the northeastern border of the Idaho-Maryland Mine mineral rights area and is under a mile, as the crow flies, from both the Centennial and Brunswick Industrial sites. After reviewing the DEIR, we believe the Report to be inadequate for the reasons noted below.

Ind 223-2 Our first major concern is water. One of the biggest risks posed by the mine is the possibility of damaging or destroying our wells, yet the DEIR only includes protections for 30 well owners off of Bennett Road and even those protections are inadequate as they cover the first 5 years, not the full 80 years of mining planned. The Report repeatedly acknowledges the high level of uncertainty in hydrological models. Yet, there is no acknowledgement of risk or plan to safeguard the roughly 525 private wells within a ½ mile of the mineral rights boundary which includes our well. We rely on our well as the cost to hook up NID water was prohibitive for us. Given the effects from mine dewatering, probable contamination, and drought, the Report's proposed mitigations are invalid and inadequate.

Ind 223-3 Our second major concern is noise and glare. The mine will be operating 24/7 with many mine operations occurring during the night. Sound carries, especially at night, so we fully expect the noise decibel and light level to increase exponentially disrupting sleep. Moreover, the plans for blasting don't follow the U.S. mining guidelines that restrict blasting during evening hours. Thus, in this area too, the DEIR fails to correctly address these matters.

Ind 223-4 Our next major concern is air pollution and traffic. Trucks traveling between the industrial sites will be spewing toxic dust particles into the air. Traffic safety too along Brunswick, an already busy and dangerous road, will be adversely impacted. Just in the last 12 months, there was a fatal accident at the intersection of Brunswick and Loma Rica. Yet, the DEIR has downplayed the traffic volume and called Brunswick a low-traffic road.

Finally, the potential negative impacts to our water, air, land, health, property, and environment as a whole cannot be understated. The final EIR must fully and accurately identify the risks posed to the entire area within the mineral rights boundary and a complete set of safeguards to protect our community now and in the future.

Ind 223-5 Thank you for your attention and consideration to this critical matter.

Sincerely,

Elise and Ken Stupi

13068 Madrona Leaf Court
Grass Valley, CA 95945

INDIVIDUAL LETTER 223: ELISE STUPI

Response to Comment Ind 223-1

This comment is introductory in nature and the commenter states that the DEIR is inadequate. Responses to specific comments are provided below.

Response to Comment Ind 223-2

The commenter states that the DEIR understates the number of private wells potentially impacted from the dewatering of the mine and is generally concerned about dewatering the mine during a drought. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 223-3

The commenter states that the project would cause adverse noise and glare impacts, especially with regard to operations at night, but does not identify how the DEIR is inadequate in this regard. The DEIR analyzes noise from operations, including during the night, and found the impacts to be less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR and Response to Comment Grp 21-130.

Regarding the impacts from glare, the DEIR states that the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less than significant impact would occur. (DEIR, p. 4.1-29.) As stated on page 4.1-24 of Chapter 4.1:

> Based on the proposed lighting types and locations discussed above, a Photometric Plan was prepared for the Brunswick industrial Site by a registered professional electrical engineer (M. Niels Engineering, Inc.). Figure 4.1-2 through Figure 4.1-5 present the Photometric Plan and increases in visible light that are estimated to occur following implementation of the proposed exterior lighting plan. Key considerations include effects to the night sky, which are addressed through the lighting types proposed, as discussed above. The other key consideration are the lighting intensities at the property boundaries near locations where existing sensitive receptors are in close proximity.
>
> As shown in the figures, the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles[9], and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries. Furthermore, the proposed buildings would be painted with nonreflective, nonmetallic paint, which would not cause glare. Lighting or reflective surfaces would not be added upon reclamation of the Brunswick Industrial Site, and reclamation activities would not occur at night.

Lastly, the commenter states that project does not adhere to federal mining guidelines for blasting during nighttime hours. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 223-4

The commenter is concerned about air pollution and traffic and states that the DEIR understates the amount of traffic on Brunswick Road. Traffic impacts from trucks are evaluated in Chapter 4.12 (Transportation) of the DEIR and are less than significant after mitigation, with the exception that the impact to the intersection at SR 174/Brunswick Road would be significant and unavoidable even after implementation of mitigation. Air emissions from the project are less than significant after mitigation. The commenter is referred to DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). Mitigation Measure 4.3-2 of the DEIR requires an Asbestos Dust Mitigation Plan which requires that trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings. All loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation and shall either be completely covered with tarps or have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.

Response to Comment Ind 223-5

The commenter generally states that impacts to water, air, land, and health must be fully analyzed but provides no additional information and does not state how the DEIR is inadequate. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.4 (Biological Resources), and 4.8 (Hydrology and Water Quality) of the DEIR. The commenter is also referred to Master Response 7 - Location of Future Mining Areas. The commenter also states the project will impact property values. The commenter is referred to Master Response 2 - Social and Economic Impacts.

Individual Letter 224

From: Elise Zink <ultimatelc@gmail.com>
Sent: Monday, April 4, 2022 1:05 PM
To: Idaho MMEIR
Subject: Please, no mine

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Ind 224-1

Good afternoon,
I am writing to ask that Matt Kelley, Senior Planner, be encouraged to comment on the Draft Environmental Impact Report submitted by Rise Gold. It is imperative that all components of this project are well researched and deeply considered. The health of our water and our children rests on this decision.
Please do what is best for the health of your community. There are other ways to improve our employment rates/job availability. We must learn from the mistakes of the Past and make better decisions for our Future.
Most sincerely,
Elise Zink

INDIVIDUAL LETTER 224: ELISE ZINK

Response to Comment Ind 224-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 225

From: Elissa Preston <grandvalleymarmots@gmail.com>
Sent: Monday, April 4, 2022 4:26 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea nc.org
Subject: Comments re: proposed mine

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April 3, 2022
Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Re: Comments on the DEIR on the Idaho-Maryland Mine Project
Dear Mr. Matt Kelley,

Ind 225-1

I am writing to you to express my opposition to the possibility of the Rise Grass Valley (subsidiary of Rise Gold) project moving forward. We moved our family to the Nevada City area 7 years ago, attracted by the thriving local communities in Grass Valley and Nevada City, which include a strong and balanced economy of retail, industry, construction, professional jobs, and arts. The area's natural beauty, slowly won back since the original mining devastated the area, attracts tourists and new residents.

It is foolish and short-sighted, not to mention unnecessary, to reintroduce mining into the community. We need to focus economic activity in our community on businesses that will be here for the long haul, not here to mine gold briefly and leave behind a legacy of environmental degradation as Rise Gold CEO Benjamin Mossman has done at his bankrupt Banks Island Gold site in British Columbia. Those of us who live here have a vested interest in ensuring the long-term health of the community. Rise Gold does not.

Ind 225-2

Community health is predicated on having clean water and air. The DEIR (pg 201) indicates that the project will use 1,224,00 gallons per day of water. The DEIR goes on to detail that only a small part of this water will come from NID. The Well Mitigation Plan (Appendix K9) indicates that the 'expert opinion' of Rise Golds hydrology analysis is that only 1 well may be negatively impacted by the mines water use (Appendix K9, pg 1). Yet the firms used to develop the analysis and reports are firms that cater to the industry – it is in their best interest to make the project possible for Rise Gold!

The findings of the 'expert opinion' are highly suspect; they did not include any actual well monitoring during the dewatering done for mine exploration (5-year project beginning in 1996).

Those of us who live here in Grass Valley and Nevada City will shoulder all the risks, but we are being asked to put our trust in Rise Gold that they will follow through on all the testing described in the DEIR. We are also expected to trust that no one outside of the underground activity area will be impacted, since all monitoring wells, except one, detailed in the DEIR (Appendix K8, Figure 1) are within the Mineral Rights Boundary.

Ind 225-3

In addition to water availability issues around the massive water use by the mine, I also wonder where all this water will go. Table 2-1 of the DEIR indicates mitigation measures are not required to deal with expanded "water, wastewater treatment, or storm water drainage" (Impacts 4.11-6 and 4.11-8) needs due to the mine. Pages 177-180 then goes on to detail an on-site water treatment facility to treat water before it is dumped into South Fork Wolf Creek. This treatment being planned for implies that the mine *will* produce wastewater that

1

requires treatment. However, the plan never addresses how this system will deal with extreme weather events. One spill of toxic wastewater can lead to irreparable harm to downstream ecosystems.

Consider a snow event followed by rain, which would lead to a rapid melting of the snowpack and massive runoff. When a severe flood event hits, how will the mine deal with all the water coming through their treatment ponds? Our community will be stuck with the aftermath, just as the Gitxaala Nation was stuck with the mess from mine waste overflowing into the surrounding environment at Benjamin Mossman's bankrupt Banks Island Gold site after heavy rains hit the site June 24-25 of 2015.

It's common civil engineering practice to design to the 25-year flood event. Unfortunately, severe weather events are becoming more common. The DEIR makes no mention of planning for flood events, certainly not 100-year flood events, not even 25-year flood events. This shows a callous disregard for the communities his mines operate in. He and his mine are no friend to our community.

Ind 225-4

Grass Valley and Nevada City already have bad air as we receive pollution from Sacramento and the Bay Area. We don't reap their tax dollars, but we do get their air pollution. If the Idaho-Mayland Mine is approved we will enjoy the pollution from all the heavy trucks and machinery, the dust created by this operation. This dust that will contain asbestos, and silica among many other harmful contaminants that will affect us all, but especially children and those with asthma and other illnesses. According to the California Air Resources Board (CARB) "identified DPM (Diesel Particulate Matter) as a toxic air contaminant based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects." And "these effects include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies. Those most vulnerable to non-cancer health effects are children whose lungs are still developing and the elderly who often have chronic health problems."

(https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health) The DEIR claims no significant impact coming from mine operations. It is patently absurd to think that all the diesel exhaust, asbestos, silica and other contaminants that will soon be in our air (and lungs) if mine operations begin will have no impact or be less than significant (Table 2.1). This is so outrageous it would be laughable–if it weren't for the fact that our community will suffer the health impacts for decades to come.

Ind 225-5

One last item – traffic. Let's pick just one traffic issue from the DEIR, the SR-174/Brunswick Road intersection. The DEIR indicates significant impact. The mitigation "project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%." So Rise Gold will be paying just 14.9% of the mitigation costs at this one intersection? Residents of the region will be suffering the result of all this truck traffic, including the impediment to rapid emergency response by our firefighters and emergency workers – and *we'll* also be footing most of the bill for the mitigation!

Ind 225-6

These issues with the DEIR are just the tip of the iceberg. I urge you to see this DEIR for what it is, a document crafted to hide and obfuscate the damage this mine will do in order to get the project approved. There are hundreds of millions of dollars at stake for Rise Gold, and they will do what it takes to try to get this approved. This community, and its elected and appointed officials, need to see through the disingenuous claims of no harm that are repeated throughout the DEIR. In our own community we are still cleaning up from the prior generation of hard rock mining, and in communities throughout the globe, hardrock mining leaves a wake of devastation to the environment and communities as it mines profits at our expense.

Sincerely,
Elissa Preston, RN
Benjamin Preston, teacher
Nevada County residents

INDIVIDUAL LETTER 225: ELISSA AND BENJAMIN PRESTON

Response to Comment Ind 225-1

This comment is introductory and the commenter opposes the project and references the project Applicant's prior mining project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 – Operator Responsibility.

Response to Comment Ind 225-2

The commenter states that DEIR and supporting studies are biased in favor of the Project Applicant. However, the DEIR notes that an independent consultant, West Yost, peer reviewed several hydrology-related studies and after implementation of certain revisions, agreed with their findings. (DEIR, p. 4.8-40.) The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The analysis provided in Section 4.8-2 of the DEIR concludes that the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. No significant impacts to domestic water wells are predicted in other areas. The predictions include the use of a 100% safety factor, multiple sensitivity scenarios, and have been peer reviewed by the County's independent expert consultant.

Response to Comment Ind 225-3

The commenter is concerned that an extreme weather event could overwhelm the onsite wastewater treatment system before the mine water is treated. As discussed on page 4.8-73 and -74 of the DEIR:

> Based on a 2019 survey by Nevada City Engineering, Inc., the volume of the pond with two feet of freeboard below the elevation of the emergency overflow spillway is 23 acre-feet. The freeboard volume is 6.6 acre-feet. The spillway is also two feet below the lowest point on the berm surrounding the pond. At the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. The total runoff from the 6.4 acre watershed for the pond resulting from a 100-year, 24-hour storm would be approximately 5.7 acre-feet. Thus, the freeboard volume is more than adequate to retain the runoff from an extreme storm event. Overall, the existing clay-lined pond has more than adequate capacity to accommodate operational flexibilities for dewatering and water treatment, and to retain stormwater runoff from the area surrounding the pond.[39]

Response to Comment Ind 225-4

The commenter states that the DEIR incorrectly states air quality impacts will be less than significant but does not explain why the DEIR is inadequate. The commenter is referred to Chapter 4.3 of the DEIR which provides the analysis of air quality impacts and health risk assessment. As discussed in Section 2.1 of the Health Risk Assessment for the project, implementing the OEHHA Guidance, as was done for the project, reflects conservative, health-protective methodologies to assess health impacts to adults, as well as infants, children, and other sensitive subpopulations. For example, the reference exposure levels (RELs) used in the evaluation of non-cancer risk are designed to protect the most sensitive individuals in the population, including infants and children, by selecting appropriate toxicological data and including margins of safety. Accordingly, the evaluation methods are assumed to protect children and other sensitive subpopulations (groups

of more highly susceptible individuals) from adverse health effects in the event of exposure. A similar approach was taken for cancer risk, which accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates and age-sensitivity factors (ASFs), as well as conservative exposure period, fraction of time at home, and cancer potency factors as recommended by OEHHA.

Asbestos and silica release have been evaluated in the DEIR. Please see Master Responses 21 and 22.

Response to Comment Ind 225-5

The commenter takes issue that the Project Applicant's fair share contribution towards transportation improvements is 14.9%. As stated in CEQA Guidelines Section 15041(a), Authority to Mitigate:

> A lead agency for a project has authority to require feasible changes in any or all activities involved in the project in order to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law

As stated above, the mitigation obligation of the project must be roughly proportional to the project's contribution toward the impact.

Regarding impeding firefighters and emergency workers, the commenter is also referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 225-6

The commenter concludes with a general statement of opposition to the project. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 226

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 2022

Dear Planning Commission and Board of Supervisors,

I write to express my complete disapproval of the plan to reopen the Idaho-Maryland Mine. The reasons are many.

Ind 226-1 While Nevada County has it's history based on mining, that time has come and gone. Nevada City/Grass Valley has transitioned into a tourist destination and a quiet, residential community. A mine destroys all of that. Mining is loud, pollutes, does not create as many jobs as Mossman's group would have us believe, and our roads are not equipped to handle the amount of traffic the mine would generate. These are small towns that would be forced to put up with 24/7 operations starting early in the am and lasting well into the evening.

Ind 226-2 It is surprising that we would even consider this option presented by Ben Mossman who has a proven track record for his deceitful and irresponsible, i.e., criminal, actions with his mine in Canada. Let me remind you that he was convicted of environmental crimes in Canada, which he is currently appealing. You have allowed him to present an "independent" draft EIR that hardly addressed the many problems this mine would create. Their tactics for swaying the community to be in favor are slick at best. It was a fine PR campaign but they have lied to all of us on their shiny brochures and they have solicited input from a wide circumference of communities that would not be impacted. Let's focus on how the immediate community would be affected. You had an enormous outpouring of the local community at the March 24th hearing which spilled outside of the building even though you met on a workday morning. The Board of Supervisors need to listen to the people they were elected to represent. They must be honest and represent us.

Ind 226-3 In addition to the above, the timing seems preposterous to consider opening a mine, which will require a significant amount of water, during a historic and ongoing drought. Not only does this affect the wells of the people near the mine, it is also an extremely important factor considering we live in an area of extreme fire danger. You have had experts present on this. Please listen to this. Not only is it our water source that we need to protect, you also need to consider the additional amount of pollutants added to an area that is already heavily exposed to contaminants every single time we have a fire and our air quality is hazardous. The health considerations for our community are tremendous.

This proposal is for an 80 year commitment. Think about that, most of us will be dead by the time that contract expires. Our children won't be or maybe they will be

from the health consequences. Or, they might simply move away because the environment will have become intolerable.

I ask that you please follow the desires of this community by not allowing this project to move forward.

Sincerely,



Elizabeth Mendelsohn
13186 Nob Hill Dr.
Nevada City, CA 95959
elizabeth@photoncreative.com

INDIVIDUAL LETTER 226: ELIZABETH MENDELSOHN

Response to Comment Ind 226-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 226-2

Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 226-3

Please see Master Response 16 in regard to drought and climate change. In addition, wildfire impacts are addressed in Chapter 4.13, Wildfire, of the DEIR, as well as Master Response 6. Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Individual Letter 227

From: Liza Barron <lizabarron88@gmail.com>
Sent: Monday, April 4, 2022 1:16 PM
To: DEIRcomments@cea-nc.org; Idaho MMEIR
Subject: Comment on Idaho-Maryland Mine DEIR

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Good Afternoon,

I'm Elizabeth Barron. I wanted to express my concern about the potential re-opening of the Idaho-Maryland mine. I have lived in Grass Valley for nearly 6 years and I intend to make this my home for a very long time. After reviewing the DEIR I am concerned about noise, and air pollution.

Ind 227-1

I live only 1.5 miles from the mine and the DEIR does not sufficiently assess or mitigate potential noise impacts. Per the *Idaho-Maryland Mine Project, Nevada County, CA Acoustical Comments on Draft Environmental Impact Report Salter Project 22-0039*, "nighttime noise is not adequately addressed in the DEIR. It outright dismisses the potential for noise impacts due to sleep disturbance and inappropriately excludes this consideration from the analysis." As a Registered Nurse I work and night and sleep during the day. If noise levels are above acceptable levels at night, how will they be during the day when I am trying to sleep between shifts?

Aside from noise, I care more about the health and we'll being of me and my neighbors.

Ind 227-2

The DEIR does not adequately address toxic material mitigation like asbestos. According to a review by Pam Heard RRT, "Just because Rise believes that they will be able to control the distribution of material to 0.01% asbestos content does NOT mean that they can control the amount of asbestos in the actual mined material. The content of asbestos in the serpentinite is unknown until tested-this requires blasting, excavation, crushing, skipping, conveyance to the surface, deposition and storage to then be followed by testing. Ventilation from the mine during these underground processes will emit asbestos to the ambient environment. This quantity of asbestos emissions is unknown and CANNOT be assumed to be only 0.01%.... The World Health Organization (WHO) concurs that there is no safe level of asbestos exposure."

There are several other issues not addressed in the DEIR. Inadequate estimates of mining impact will put peoples health at risk. In a community that has an large percentage of elders with chronic health problems like cancer and cardio-pulmonary disease, we don't need it to get worse.

Ind 227-3

We need to protect our community. Thank you for taking the time to read my comments.

Elizabeth Barron
408-410-1465

INDIVIDUAL LETTER 227: ELIZABETH BARRON

Response to Comment Ind 227-1

The commenter states that the DEIR's analysis of noise impact are inadequate with regard to sleep disturbance. The commenter is referred to Response to Comment Grp 21-130.

Response to Comment Ind 227-2

The commenter states that the DEIR inadequately addresses the risks poses by asbestos emissions. The commenter is referred to Response to Comments Grp 7-6, 7-7 and Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 227-3

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 228

From: elisabeth linsky <seenskincare@gmail.com>
Sent: Monday, April 4, 2022 10:25 AM
To: Idaho MMEIR
Subject: The Mine

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To Whom it May Concern,

Ind 228-1 I am deeply concerned about plans to reopen the Idaho Maryland Mine. It will be incredibly destructive to our local lands. We should not be considering damaging our lands for the sake of profit. There are countless ways the mine could have damaging effects reported in the DEIR that concern me.

-The poor air quality. We already navigate dangerous air quality during fire season.

-A potential loss of water. California can't afford to lose any more water!

Ind 228-2 -Potential contaminants and hazardous materials. The process to reopen the mine requires pumping water from the existing mine, filtering and releasing it into our beloved Wolf Creek. What about the chemical compounds used in mines? It's just dangerous. We know better.

Ind 228-3 -The impact on the flora and fauna of the area.

Ind 228-4 -What about the quality of life for the neighborhoods nearby?

Ind 228-5 If the company were to go bankrupt or abandon its interests, which has historically often happened, it will be up to us locals to repair what remains. Our county has a long history of dissemination of our beautiful lands in the name of greed. We can't let history repeat itself once again. We need to take a stand for our future.

Fifteen year resident and business owner in our dear Nevada County,

Elisabeth Linsky
seenskincare@gmail.com
415-745-0826

INDIVIDUAL LETTER 228: ELISABETH LINSKY

Response to Comment Ind 228-1

Please see Master Response 1. Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Please also see Master Responses 13 through 16 regarding groundwater. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 228-2

Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for more information related to mining waste. In addition, please see Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 228-3

Please refer to Chapter 4.4, Biological Resources, of the DEIR for more information related to impacts on flora and fauna. In addition, Master Responses 30 through 38 provide additional responses to biological resource comments. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 228-4

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 228-5

The comment does not address the adequacy of the DEIR. Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 229

From: Ellen Davis <winterlaurel@gmail.com>
Sent: Monday, April 4, 2022 4:31 PM
To: Idaho MMEIR
Subject: NO to the mine!

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To whom it may concern,

I would like to voice my objection to the Idaho-Maryland Mine Project. The impact of the mine would be detrimental to the local environment and quality of life of the residents.

The toxic waste could easily get into the groundwater, they would use up a huge amount of water when we are already in drought conditions, and the dust in the air would really degrade the quality of the air- which is already bad because of the pollutants that drift up from the valley, and imagine how much worse it would get during smoke season!

The constant noise, vibrations from heavy trucks and equipment would ruin the peace and quiet of the neighborhoods. Quiet should not be underrated - noise has a significant impact upon the health and well-being of those exposed to it. I have a friend who lives in the neighborhood and is selling their house because of the proposed mine project. If they wait and see, then they would get less for their home, and may not be able to afford another home in this area.

Ind 229-1

And how much of this money would actually go back into the community? How many jobs and revenue would it actually bring to locals? I used to live in Alaska and the oil, gas, and mining companies have reaped huge profits and have had negative impacts upon the wild landscape. While the residents do get some oil dividends through the Permanent Fund Dividend (PFD) that amount is a tiny fraction of what gets taken out of the state in profits, and the politicians have been trying to get their grubby hands on the PFD. Even if it was a lot more - is the money still worth ruining the environment? There are no jobs on a dead planet.

Thanks for listening,
Ellen Davis

1

INDIVIDUAL LETTER 229: ELLEN DAVIS

Response to Comment Ind 229-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Individual Letter 230

From: Ellen Johnson
To: Sue Hoek; bdofsupervisors
Cc: Heidi Hall; Ed Scofield; Dan Miller; Hardy Bullock; Jeff Foster
Subject: Rise Gold Mine Concerns
Date: Saturday, February 19, 2022 1:37:12 PM

Dist 4

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Dear Sue Hoek and Supervisors of Nevada County,

Ind 230-1 My husband and I live in Nevada County having moved here approximately 5 years ago with our businesses and to create a small farm. Part of our attraction to this area was the beauty and pristine nature of the environment. However, it has recently come to our attention that you are considering offering the company, Rise Gold Mine, an opportunity to open and do mining in our county. **We are concerned and strongly opposed for many reasons.**

Ind 230-2 Those include: Soil pollution, groundwater pollution, deforestation, depletion of natural resources, destruction of habitats, endangerment of species, loss of biodiversity, landslides, ecological imbalance, traffic, noise issues, effects on our already drought and high-fire risk, high amounts of particulate matter caused by the crushing and compacting of gravel putting our community at higher risk for lung and breathing problems not to mention the dangers and poor working conditions in the mines.

To quote other sources on the detrimental impact on gold mining:

"Gold mining is one of the most destructive industries in the world. It can displace communities, contaminate drinking water, hurt workers, and destroy pristine environments. It pollutes water and land with mercury and cyanide, endangering the health of people and ecosystems. Producing gold for one wedding ring alone generates 20 tons of waste."

Ind 230-3 **Links:**

1. https://earthworks.org/campaigns/no-dirty-gold/impacts/#:~:text=Gold%20mining%20is%20one%20of,health%20of%20people%20and%20ecosystems.
2. https://www.brilliantearth.com/gold-mining-environment/
3. https://www.smithsonianmag.com/science-nature/environmental-disaster-gold-industry-180949762/
4. http://news.bbc.co.uk/2/hi/europe/1146979.stm
5. https://www.nytimes.com/2005/07/10/us/as-a-gold-mine-prepares-to-close-montana-argues-over-the-hole-in-the.html
6. https://www.nbcnews.com/id/wbna28596948#.VEfObYvF95k

Ind 230-4 **Our own community has raised a number of concerns regarding the exploratory operations and non-compliance issues:**

- **Ind 230-5** Violation of timber harvest regulations; in constructing an equipment storage area, RISE removed a healthy stand of timber, including ponderosa pine, incense cedar, and big leaf maple, without a timber harvest plan.
- **Ind 230-6** Multiple violations of the 100' riparian setback from a perennial stream (in this case South Wolf Creek, a tributary of Wolf Creek, which runs in close proximity to this site).
- **Ind 230-7** Failure to follow the approved grading plan.
- **Ind 230-8** Multiple violations of StormWater Management best practices.
- Violation of a subsequent Comprehensive Management Plan.

Additional concerns with the exploratory operations:

Ind 230-9

- Advances in drilling technologies allow directional drilling and drilling to greater depths. The drilling equipment being operated by RISE (24 hours per day, 7 days per week) is essentially a super-sized well-drilling rig. It can drill a mile deep and is multi-directional, so it can "explore" under neighboring properties.

Drilling operations can continue for many months.

Ind 230-10 • Multiple shafts penetrate the impermeable rock layers that underlie local shallow aquifers. The potential damage to residential water wells, local aquifers, and the adjacent perennial stream is unknown.

Ind 230-11 • Repeated noise complaints from residents with homes near the mine site.

Ind 230-12 • Repeated light pollution complaints due to bright floodlights. And dust.

Ind 230-13 • Hundreds of gallons of drilling fluid compounds and lubricants are used. Strong odors of solvents reported by passing cars.

Ind 230-14 • Since no permit is required for exploratory drilling, there is no prescribed oversight from County officials, enforcement action is driven by complaints.

Ind 230-15 • There are no requirements for restoration or reclamation plans.

Ind 230-16 • There is no bonding, licensing, or insurance required.

Documents filed by RISE reveal some objectionable aspects of the planned mining operation. These include the following:

Ind 230-17 • The project would remove forested areas and deposit massive amounts of waste rock and tailings on two Grass Valley sites, ultimately covering 75 acres to depths of up to 90 feet. Haul trucks would run on Brunswick Road and Whispering Pines Lane up to 100 round trips daily 16 hours a day. Residential neighborhoods in the area would be significantly impacted with noise, dust, traffic, and the prospect of living adjacent to large processing facilities and continuous gravel operations involving bulldozers, graders, and compactors.

Ind 230-18 • The project would consume a quantity of PG&E electricity equal to what is used by approximately 5000 homes and emit around 9,000 tons of greenhouse gas emissions annually. In this time of climate crisis this is inexcusable.

Ind 230-19 • The dewatering of the mine would require a purification system to run forever to remove pollutants. Wells are at risk. The outflow would put South Fork Wolf Creek at flood stage with multiple impacts to riparian habitat and to the Grass Valley drainage systems.

We insist, for the betterment of our communities, that you **stop this mining operation** before it begins any exploratory or other purpose. Nevada County can find other job opportunities that will have a healthier and sustainable impact on our beloved California area.

Ind 230-20 Thank you for the opportunity to express our opinions which are shared by a large number of this community.

Sincerely,

Ellen Johnson & Jeff Foster
Big Oak Valley residents

--
Ellen Johnson
vocalvisions@gmail.com
310-487-0048
www.ellenjohnson.net
www.vocalvisions.net
www.soundvisionsmedia.com

INDIVIDUAL LETTER 230: ELLEN JOHNSON

Response to Comment Ind 230-1
This comment in introductory in nature and the commenter opposes the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 230-2
The commenter generally lists a variety of perceived adverse impacts associated with the project such as groundwater pollution, traffic, and noise, but does not specifically state why the DEIR is inadequate or provide any other information on which to formulate a more specific response. All of the issues raised by the commenter have been analyzed in the DEIR. The commenter is referred to Chapter 4 of the DEIR and Master Response 1.

Response to Comment Ind 230-3
The commenter alleges that gold mining in general is ecologically destructive and provides web links to articles on gold mining. This comment does not address the adequacy of the DEIR. For that reason, the County provides no further response to this comment other than to note that page 3-25 of Chapter 3, Project Description, of the DEIR states mercury or cyanide would not be used in gold mineral processing.

Response to Comment Ind 230-4
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-5
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-6
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-7
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-8
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-9
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-10
The impact to groundwater levels from mine dewatering and mining is extensively analyzed in the DEIR. See Chapter 4.8 of the DEIR, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 230-11

This comment does not appear to address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration. With respect to noise associated with potential future operations of the project, see Chapter 4.10, Noise and Vibration.

Response to Comment Ind 230-12

This comment does not appear to address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration. With respect to lighting associated with potential future operations of the project, see Chapter 4.1, Aesthetics.

Response to Comment Ind 230-13

This comment does not appear to address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration. With respect to hazardous materials associated with potential future operations of the project, see Chapter 4.7, Hazards and Hazardous Materials.

Response to Comment Ind 230-14

This comment does not appear to address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 230-15

This comment does not appear to address the adequacy of the DEIR and has been forwarded to the decisionmakers for their consideration. Regarding the Reclamation Plan for the project, see Appendix C to the DEIR.

Response to Comment Ind 230-16

The commenter states that the project does not require any bonding, licensing, or insurance. The project requires an approved Reclamation plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the mining operation's approved Plan. The commenter is referred to page 4.6-24 of the DEIR and Appendix C of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 230-17

The commenter references several impacts associated with the project such as the placement of engineered fill, noise, and traffic, but does not provide any specific comments on the adequacy of the DEIR. All issues raised by the commenter are analyzed in the DEIR. Please see Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.4 (Biological Resources), 4.10 (Noise and Vibration), 4.12 (Transportation) of the DEIR.

Response to Comment Ind 230-18

The commenter states that the project's energy usage in inexcusable, especially in the context of the climate change. The commenter is referred to Master Response 25 – Nevada County Energy

Action Plan, Master Response 27 - Greenhouse Gas Thresholds, and Response to Comment Agcy 8-17.

Response to Comment Ind 230-19

The commenter states that the dewatering of the mine would require a permanent purification system to remove contaminants and that the discharge to South Fork Wolf Creek would place the creek at "flood state." As stated on page 4.8-51 of the DEIR, after mining is completed, and as underground mine workings fill with groundwater, water from the underground mine workings would begin to seep from the existing drains. The water that would seep from the underground workings is anticipated to have similar water quality to the water that currently discharges from the existing drains. Specifically, it may contain elevated levels of iron and manganese. Therefore, the conditions after mining is completed would be similar to existing, or baseline, conditions, such that re-activation of the seeps would not represent a potentially significant impact under CEQA. Although part of the existing environmental setting, some of the seeps have elevated arsenic levels that could pose a threat to human health or the environment. However, despite these existing discharges from the drains, the reported concentrations of all metals and other constituents in the Wolf Creek samples are well below the NPDES water quality standards.

The mine water discharge would not put South Fork Wolf Creek at "flood stage". The commenter is referred to Chapter 4.8 of the DEIR and Master Response 36 - Flows in South Fork Wolf Creek.

Response to Comment Ind 230-20

The commenter urges that the County not approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 231

From: Ellen Macdonald
To: Idaho MMEIR
Subject: Rise Gold Mine
Date: Sunday, April 3, 2022 7:16:45 PM
Attachments: image.png

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To: Matt Kelley, Senior Planner
Nevada County Planning Dept.
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

April 3, 2022

From: Ellen Macdonald
10581 Bragg Avenue
Grass Valley, CA. 95945

Re: Proposed Rise Gold Mine Project

My name is Ellen Macdonald and I have lived at the above Grass Valley location since 1997.

Ind 231-1 My reading and understanding of the Environmental Impact Report (EIR) have been restricted to the hazards of the proposed project with particular attention to those hazards to our watershed, wildfire risk, and air quality. These three areas were all considered to have significant impacts from the proposed project unless there were mitigations made by one of the four alternatives listed.

The first alternative was "NO Build", no mine project at all, and of course has little to no impact on our environmental quality. The elimination of the Centennial Industrial Site, alternative 2, has fewer impacts than the other two. I think the two other alternatives, #'s 3 & 4 , should not be considered at all since both are just as hazardous to water and air quality or are worse than the original proposal.

Ind 231-2 That leaves #'s 1 & 2 alternatives to the original proposal. I am still concerned about this proposed mine even with the mitigation from the elimination of the Centennial Industrial Site. For me, it comes down to simply why mess with our watershed at all when we are already in another drought cycle, with the likelihood of yet another summer of wildfires all around us and the resulting poor air quality from those fires. There is no reason to believe that next year will not be another dry one. These more frequent and longer drought periods seem to be the climate pattern now for Northern California.

Ind 231-3 What makes this mine proposal even worse to me is that it's all for gold for a private company. I think we would be taking too many risks to the environment if the mine is approved and all that for gold. If we were all discussing a public works project, such as the Centennial Dam, we would be having an entirely different conversation.

I realize that I am not saying anything that you on the Planning Commission don't already know or haven't already heard from others in the community. Lord knows I could never be as articulate about the EIR as those citizens who so knowledgeably spoke to you on the 24th of March at the public hearing at the Rood Center. But I still feel as strongly as everyone else in opposition to the proposal of this mine reopening.

Thank you,
Ellen Macdonald

INDIVIDUAL LETTER 231: ELLEN MACDONALD

Response to Comment Ind 231-1

The mitigation measures proposed to reduce impacts to a less than significant level in Section 4 of the DEIR are not reliant on the alternatives discussed in Chapter 6 of the DEIR. The Alternatives Analysis chapter of the EIR (Chapter 6 of the DEIR) includes consideration and discussion of a range of reasonable alternatives to the project, as required pursuant to CEQA Guidelines Section 15126.6. The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

A comparison of environmental impacts for project alternatives is provided in Table 6-1 of the DEIR. Alternatives 3 and 4 would have similar or fewer air quality impacts than the project and similar or greater hydrology and water quality impacts as the project.

Response to Comment Ind 231-2

The commenter is concerned about the project's hydrological impacts in light of the drought and climate change but does not state why the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 231-3

The commenter urges the County not to approve the project. The commenter's opposition to the project is noted for decisionmakers. Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 232

From: Elliot Schneiderman <elliot.schneiderman@gmail.com>
Sent: Friday, April 1, 2022 2:12 PM
To: Matt Kelley
Subject: Critique of Groundwater Modeling submitted for consideration into final EIR
Attachments: CritiqueOfGroundwaterModeling_Schneiderman.pdf

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Hi Matt,
Thanks for sending a copy of the Todd 2007 report.

Attached please find a pdf of a 4-page critique of Groundwater Modeling and Analyses in the Rise Gold draft EIR, which I am submitting for review and consideration into the final EIR.

Kindly let me know that you received and are able to open and read the pdf file.

Sincerely,

Elliot Schneiderman

On Fri, Apr 1, 2022 at 11:03 AM Matt Kelley <Matt.Kelley@co.nevada.ca.us> wrote:

> Good Morning Mr. Schneiderman:
>
> My apologies for the delay in being able to reply to your email. Attached is a copy of the 2007 Hydrogeolgic Assessment of the Idaho-Maryland Mine by Todd Engineers.
>
> Thank you and if you have any additional questions, please let me know.
>
> Thank you,
>
> **Matt Kelley**
>
> *Senior Planner*

Ind 232-1

1

Planning Department

County of Nevada

Community Development Agency
950 Maidu Ave. Suite 170 office 530.265-1423

PO Box 599002 https://www.mynevadacounty.com/512/Planning-Department

Nevada City, CA 95959-7902

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I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for new application submittals and appointments. Walk-ins are welcome from 8am to 5pm. To schedule an appointment with staff please contact the Planning Department at 530-265-1222, Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

From: Elliot Schneiderman <elliot.schneiderman@gmail.com>
Sent: Monday, March 21, 2022 3:55 PM
To: Idaho MMEIR <Idaho.MMEIR@co.nevada.ca.us>
Subject: Todd 2007 Report

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Hi Matt,

I just spoke with you by phone about the document:

Todd Engineers. (2007). Hydrogeologic Assessment Idaho-Maryland Mine, Prepared for Idaho-Maryland Mining Corporation Grass Valley, CA. Emeryville, California.

This document is referenced in the Rise Gold EIR and appendix k2 as the source of key hydraulic conductivity parameters used in the groundwater modeling and analyses. The derivation of these parameters are not provided in the EIR, and the groundwater modeling and associated analyses cannot be properly evaluated without knowing how these parameters were derived. The Todd 2007 report should be added to the EIR. Please let me know if, when and how this report will be made available.

Sincerely,

Elliot

elliot.schneiderman@gmail.com

518-653-2041

Critique of Groundwater Modeling and Analyses in Rise Gold Draft EIR

Elliot M. Schneiderman, PhD
Senior Research Scientist, New York City Water Supply, Retired
March 26, 2022

Ind 232-2

Rise Gold performed numerical groundwater modeling and analyzes based on an underlying conceptual model of groundwater flow in fractured bedrock (Appendix K2 Sect. 3.5). A critical assumption inherent in the conceptual model is that groundwater flow in the fractured rock aquifer can be treated as equivalent to flow in a porous media aquifer. In a porous-media aquifer groundwater flows through the gaps between small particles as laminar flow, and forms a hydrologic continuum whereby average values of aquifer properties can be used to accurately characterize the flow system. Darcy's Law (and models including MINEDW based on Darcy's Law) generally holds only for flow through porous media. As stated in the Appendix K3 (p22): *"The groundwater flow model [MINEDW] is only designed to simulate the groundwater flow through porous media based on Darcy's law"*.

Groundwater in a fractured rock aquifer typically flows through complex pathways in fractures surrounded by non-porous solid rock. The flow regime tends to be more heterogeneous, anisotropic, and discontinuous than in porous media. A good deal of research has focused on the specific conditions under which fractured rock can be treated as equivalent to a porous media. As pointed out in NRC (1996), three factors must be considered in determining whether an equivalent porous media approach is justified to evaluate groundwater flow in a fractured rock aquifer: (i) the geology of the fractured rock, (ii) the scale of interest and (iii) the purpose for which the model is being developed. Briefly, the number of fractures and their interconnections must be so numerous and interconnected throughout the area of interest such that flow in individual fractures averages out similarly to the behavior of porous media.

Since the groundwater flow regime in fractured rock is by nature discontinuous, it cannot simply be assumed to be equivalent to flow in porous media. The USGS (Risser and Barton 1995) and the USEPA (1991) provide procedures for determining if a fractured rock aquifer can be reasonably treated as equivalent to porous-media. These procedures include (i) evaluating fracture density by mapping, geophysical investigations, and borehole flow metering; (ii) aquifer testing to demonstrate continuity of hydrologic response over the area of interest; and (iii)evaluating the continuity and smoothness of the water level surface in observation wells, where anomalously high or low water levels could indicate hydraulic discontinuities, and in which case the equivalent porous-media approach is not appropriate.

The Rise Gold Draft EIR simply assumes that the fracture rock aquifer flow regime can be treated as equivalent to a porous media aquifer, with no justification provided for this critical assumption. Fracture density, interconnectivity and patterns within the area of interest have not been evaluated, and aquifer testing to demonstrate hydraulic continuity has not been performed. The Draft EIR does present water level data in observation wells within the mineral boundary of the mine and in outlying areas, but does not address the continuity of the water

Ind 232-3

level surface. Figure 1 below shows the depth to water in observation wells in the Greenhorn Area and Outlying Areas (from appendix K2 tables 4.3 and 4.4). These data reveal significant discontinuity and lack of smoothness of the water level surface in observation wells throughout the area of interest.

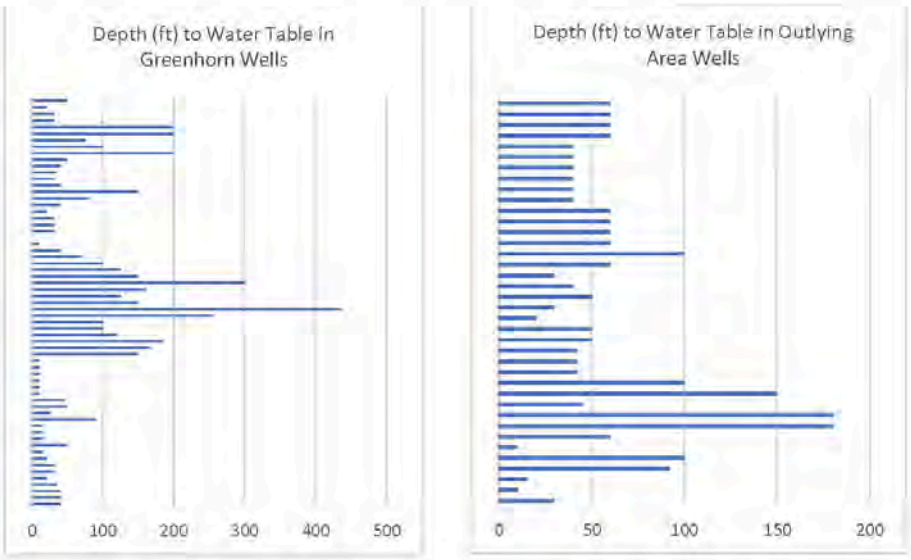

Figure 1: Depth (ft) to top of water column in Greenhorn Wells and Outlying Area Wells, displayed in order of Rise Well Id #'s (see Appendix K2 tables 4.3 and 4.4)

Todd (2007) analyzed well hydrograph data from 1994 – 2007. Their data analysis revealed significant hydrologic discontinuity in both depth to water and seasonal drawdown in adjacent observation wells. Average water levels in wells located within 800 ft of each other were found to vary by more than 100 feet, and seasonal drawdown patterns vary significantly (figure 2 below). These analyses clearly indicate a degree of hydrologic discontinuity that is incompatible with behavior of a porous-media aquifer, and shows that at the scale of the study area the equivalent porous-media assumption is not valid for this fractured rock aquifer.

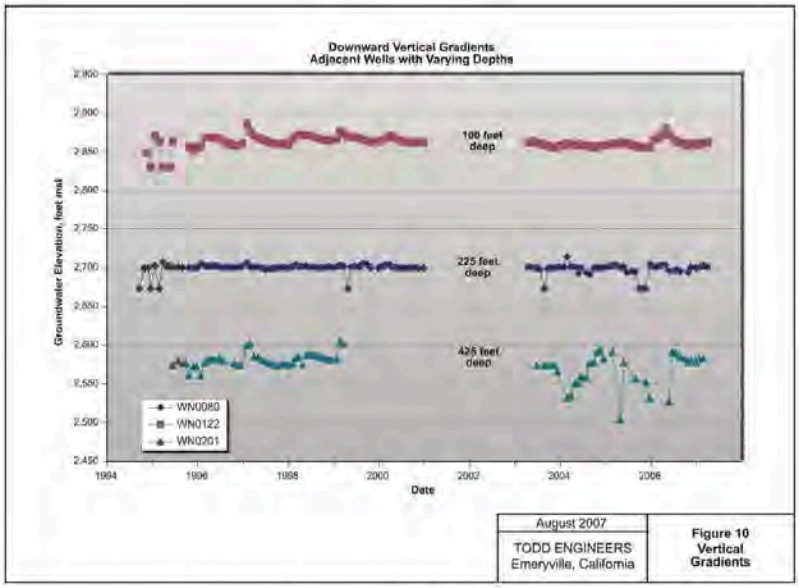

Figure 2: Hydrographs of adjacent observation wells (Todd 2007, figure 10)

The hydrologic discontinuities of the fractured rock aquifer revealed in the water level and hydrograph data for observation wells imply that the details of individual fracture sets (location, density, orientation, interconnections, aperture, and channeling properties of fractures) are important determinants of groundwater flow to individual wells. In the equivalent porous-media approach the details of individual fracture sets are ignored in favor of hydraulic coefficients that represent the volume-averaged behavior of many fractures within the fractured rock body. There are approaches to evaluating groundwater flow in fractured rock aquifers that account for the heterogeneity and discontinuities in the flow regime (Cook 2003, Risser and Barton 1995), including the discrete model approach where fracture properties and flow path geometry are explicitly characterized and accounted for; and the statistical model approach where fracture properties and geometry are measured on representative samples of bedrock and scaled up to generate plausible fracture maps of the study area which are then analyzed statistically. The Draft EIR does not consider either of these alternative approaches that might be applicable to the Rise Gold aquifer.

Ind 232-4

The lack of hydrologic continuity and failure to meet the critical assumption of porous-media equivalency essentially invalidates the results of the MINEDW modeling and associated analyses based on Darcy's Law, and thus call into question the validity of predicted drawdown isopleths based on the groundwater model (appendix K3); the groundwater monitoring plan (appendix K8) which locates wells based on the model predicted drawdown isopleths; the well mitigation plan (appendix K9) that identifies 30 individual wells that may be impacted based on model results;

the proposed mitigation measures (Draft EIR table 2.1, 4.8-2(a)) that include development of potentiometric surface contour maps based on the groundwater monitoring plan (a.3), and projecting impacts for individual wells (a.4); and the peer review by West Yost (Appendix K9) which is lacking in not addressing the critical assumption of porous media equivalency in the Rise Gold conceptual model of groundwater flow in fractured bedrock.

References:

Cook PG (2003) A Guide to Regional Groundwater Flow in Fractured Rock Aquifers. CSIRO, Land and Water, Glen, SA, Australia. 108p.

National Research Council (NRC) (1996) Rock Fractures and Fluid Flow: Contemporary Understanding and Applications. National Academy Press, Washington DC. 551p.

Rise Gold Draft Environmental Impact Report (EIR) for Idaho Maryland Mine Project, SCH#2020070378, Prepared for County of Nevada, California by Raney Planning and Management, Sacramento, CA, Dec. 2021, 1070p. https://www.mynevadacounty.com/3436/Idaho-Maryland-Mine-Draft-EIR

Rise Gold Draft EIR Appendix K2, Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project, Nevada County, CA, prepared by EMCO Environmental, Inc. El Dorado Hills, CA, Feb. 2021, 775p.

Rise Gold Draft EIR Appendix K3, Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine, Prepared by Itasco Denver Inc., Lakewood, CO, Nov. 2020, 96p.

Rise Gold Draft EIR Appendix K7, Peer Review of Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the Idaho Maryland Mine Project, Nevada County, CA, prepared by West Yost Water Engineering, Aug. 2020, 19p.

Rise Gold Draft EIR Appendix K8, Groundwater Monitoring Plan Idaho-Maryland Mine Project, prepared by Itasco Denver Inc., Lakewood, CO., Feb 2021, 46p.

Rise Gold Draft EIR Appendix K9, Well Mitigation Plan Idaho-Maryland Mine Project, prepared by Rise Grass Valley Inc, Feb. 2021, 5p.

Risser, DW, and GJ Barton, GJ, 1995, A strategy for delineating the area of ground water contribution to wells completed in fractured bedrock aquifers in Pennsylvania: U.S. Geological Survey Water-Resources Investigations Report 95-4033, 30p.

Todd. 2007. Final report hydrogeologic assessment Idaho-Maryland Mine. Prepared by Todd Engineers for Idaho-Maryland Mining Corporation, August 2007, 102p.

USEPA, 1991. Delineation of Wellhead Protection Areas in Fractured Rocks. EPA Report /570-9- 91/009, Office of Ground Water and Drinking Water, USEPA, 144p.

INDIVIDUAL LETTER 232: ELLIOT SCHNEIDERMAN

Response to Comment Ind 232-1

This comment is a cover letter regarding the submission of Individual Letter 232. No response is required.

Response to Comment Ind 232-2

The commenter asserts that the model used by Itasca to analyze groundwater flow for the DEIR assumed a porous nature for the bedrock without any support for that assumption, and failed to consider three factors set forth in a National Research Council (NRC) report to determine whether such assumption was appropriate. However, the three items that the commenter referenced from the NRC (1996) document were considered by Itasca in the formulation of their conceptual and numerical models. The conceptual model used by Itasca, in simple concepts, assumes that the shallow bedrock is significantly fractured so that it behaves hydraulically like a porous media. Below the shallow, fractured bedrock is the intact bedrock whose fractures are closed due to the vertical stresses caused by the overlying bedrock. The intact bedrock also behaves as a porous media in that groundwater flow is primarily through the extremely small pores in the rock. Itasca assigned low hydraulic conductivities and storage coefficients to the intact bedrock in which mining will occur, but higher hydraulic conductivities to the fractured bedrock closer to the surface. These assumptions were not based on mere speculation, but on observations from historic groundwater data and local geology as discussed in Section 2.4 of Appendix K.3 to the DEIR.

Because of the large scale of the area considered by Itasca in their conceptual and numerical models, and observations of groundwater and geologic data, a porous media approach was followed. This was the most reasonable approach to take due to the scale of the model area and observed data. In addition, Itasca considered the purpose of the model, which is to estimate groundwater flow and drawdowns due to mining. This approach is acceptable, as noted by the NRC (1996), a reference used by the commenter. On page 310 of this book, the following is presented:

> "The level of detail required in the conceptual model depends on the purpose for which the model is being developed—for example, whether it will be used to predict fluid flow or solute transport. Experience suggests that, for average volumetric flow behavior, predictions can be made with a relatively coarse conceptual model provided data are available to calibrate the simulation model. Thus, a continuum approximation may be used to predict well yields with sufficient accuracy, even if a fracture network is poorly connected."

The continuum approximation mentioned in this paragraph, from the NRC report referenced by the commenter, is a porous media approximation. As such, the authority cited by the commenter (NRC) actually supports the approach taken for the DEIR's analysis. The application of a continuum (porous media) approximation is applicable to mining projects in that it is used generally to estimate flows from the mine and drawdowns in water levels due to dewatering, a situation similar to predicting well yields as discussed by the NRC (1996).

A porous media approach is appropriate for the purpose of the model. It should be noted that the USEPA (1991) document has two case studies that involve numerical modeling to assess the extents of capture zones resulting from pumping wells. The purposes of the modeling were for wellhead protection, and this involves determining what portions of the aquifer contribute groundwater to a well, a situation that is similar to modeling drawdowns as the result of dewatering

from an underground mine. In both of the case studies discussed in the USEPA (1991) document, the numerical models assumed an equivalent porous media as their basis, similar to the DEIR's analysis. As such, the approach followed by Itasca is the same as that used by the USEPA.

Response to Comment Ind 232-3

The commenter provides Figure 1 to support its argument that the differences in depths to water are an indication that the shallow bedrock in which the wells are screened is highly heterogeneous and discontinuous. However, the data presentation can be misleading because it is based on the depth to groundwater. In areas with appreciable topographic variation, the depth to water can be simply a function of the ground-surface elevation and depth of the well and not necessarily indicative of substantial variations in the groundwater table. In addition, the data include a mix of the depth to first-encountered water during drilling and the depth to the static groundwater level once drilling was completed and the water level was allowed to equilibrate. The static depth to water is representative of the groundwater table at the well location. However, not all of the Well Completion Reports for the wells listed in Tables 4.3 and 4.4 of Appendix K.2 provided the static depth to water. Finally, as noted above, the depth to water measurements were made at the time each well was drilled. As noted in Appendix K.2, seasonal fluctuations in individual wells can vary by up to 30 feet, and in other areas can vary by up to 50 feet. These fluctuations are not reflected in the data from the Well Completion Reports because the wells were drilled at different times of the year. Notwithstanding the above limitations, the chart below shows the groundwater surface elevations for wells in which the static water level after drilling was reported in the Well Completion Reports. The groundwater surface elevation is within a band ranging from about 2,740 feet above mean sea level (ft amsl) to 2,855 ft amsl in all but three wells. This range is consistent with the variability that would occur due to the gradient of the groundwater table. While there is certainly some variability within the fractured bedrock, the extent and magnitude of that variability is limited and not as widespread as inferred by the commenter.

The above discussion shows the importance of obtaining the measured water levels from designated monitoring wells, which is required for the project as part of the groundwater monitoring plan. The measured water levels from the domestic wells and drill boreholes show that the variability in water levels is not necessarily due to heterogeneity but can be due to other factors. These factors include whether the water-level measurement was made before or after pumping the well and where the well is located in the groundwater flow system.

It should also be noted that there appear to be some plotting errors on the commenter's provided charts. For example, in the chart for the Greenhorn area wells, there are six wells in sequence where the commenter has plotted a depth to water of approximately 10 feet. Reviewing the data from Table 4-3 of Appendix K.2 reveals that there are not six wells total with a reported depth to water of 10 feet, let alone six in a row by Rise well number. Thus, the commenter's graphs do not accurately represent the data and do not substantiate the commenter's opinion.

The commenter uses Figure 2 to substantiate his opinion that a porous media approach is not valid for understanding groundwater flow in shallow bedrock. All three of these wells are located in the E. Bennett area nearby the Old Brunswick Mine shaft, which is dewatered (empty void) to an elevation of ~2,500 ft amsl. It must be noted that these wells are not adjacent, but up to 800 feet apart.

As noted on page 23 of the EMKO hydrology report, W19 (previously called WS122), W7 (previously called WS80), and WS201 are within the predicted 2019 drawdown cone created by the historical mining as denoted in Figure 5-3 of Itasca's groundwater flow model report (Itasca

2020). Well WS201 is drilled within feet of the Old Brunswick Shaft in the center of the predicted drawdown cone and experiences the greatest drawdown (water level in the well is ~90 feet above the water level in the mine). WS122 and WSS80 are at a similar position in the drawdown cone, but WS80 is located in the gully of an ephemeral creek, while WS122 is on a hillside. The formation of a drawdown cone, predicted by Itasca's groundwater flow model (Itasca 2020) and confirmed by the measured water levels in these three wells, substantiates that the model methodology (assuming a porous media approach) is a valid approach. .

The differences in water levels in wells does not by itself indicate whether the geologic materials behave as a fractured or a porous media. However, the fact that field-measured water levels match those predicted by the numerical groundwater flow model used by Itasca supports the assumption of using a porous media approach.

A porous media representation is an appropriate way to model a fractured bedrock system at the scale of this project. However, the DEIR acknowledges that without the implementation of a groundwater monitoring program and well mitigation plan, the project could result in a significant impact to groundwater supplies. A Groundwater Monitoring Plan (GMP) is required for the project under Mitigation Measure 4.8-2(a). As described on page 4.8-66 of the DEIR the measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. As stated in Section 3.0 of the GMP, the dewatering of the existing mine workings, prior to the commencement of actual mining, is analogous to a largescale pumping test that is a common tool in the field of hydrogeology to assess how drawdowns in the water-bearing zones. Monitoring wells in closer proximity to the mine will generally experience drawdowns before wells farther away. The measurements of water levels in the monitoring wells can be used to verify the groundwater drawdowns as dewatering progresses to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. Please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

As noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 232-4

This comment summarizes the commenter's prior arguments and has been addressed in the previous responses. Please see Responses to Comments Ind 232-1 and Ind 232-3.

Individual Letter 233

3/24/2022

225 S. Auburn Street
Grass Valley, CA
95945

950 Maidu Avenue, #170
Nevada City, CA
95959



Mr. Matt Kelley: Nevada County Planning Department,

Ind 233-1

Do you realize that Rise Gold plans to reopen the Idaho-Maryland Mine for **80 years**? That's almost an entire lifetime! Do you want your children and grandchildren to suffer through the noise and pollution of the mine for decades? The Idaho-Maryland Mine will, additionally, contaminate the precious air and water of our beautiful county. It will likely cause thousands of people to move away because of noise, traffic, pollution, and decreases in property values. Even the people out there who support the mine don't want their property values to go down! I believe that you should stop the mine because it would pollute the air, it would destroy our valuable water, and especially because it would ruin our quality of life.

Ind 233-2

Do you want to poison our air? According to MineWatch NC, "Grass Valley already gets an "F" for air quality today. The mine will only make it worse." Grass Valley most likely gets an F because of all the smoke during the summer. Can you imagine having smoke **and** a mine at the same time for 80 years? The mine would unearth, move, and crush hundreds of tons of rock. All that dust would go into the air and add to pollution. That could severely impact the lives of people in Nevada County with health problems like asthma and chronic lung disease. Mercury used in the mine for a variety of reasons can also become airborne. Inhaling mercury vapor can harm the nervous, digestive, and immune systems, kidneys, and liver. Mercury can even be fatal (World Health Organization). I can't imagine living in an area where I would have to deal with that but I will if the mine is reopened. "In addition, mine tailings, which may contain finely ground and even toxic waste, can become airborne…" (WMAN). That would also harm many people and could make many day-to-day activities impossible. I don't want my air to become contaminated.

Ind 233-3

Water is the most treasured resource in the world. It would only be wasted by the mine and its need for water. According to Environmental Risks of Mining, mines need a lot of water for extraction, processing, and waste disposal. Research also shows that Rise Gold plans to dump **3.6 million gallons** of water every day for 6 months and then **1.2 million gallons** after that for the better part of 80 years (MineWatch NC). All that wastewater depletes groundwater and pollutes nearby water sources. I feel sick thinking about what effects that much water will have on the Yuba River, Nevada County, and the state as a whole. The state has also been in a drought for years and that makes water even more valuable. American GeoSciences has shown that waste rock often contains pyrite. When pyrite is exposed to air or water, it goes through a process known as oxidation. That process is acidic and can make entire areas bare. If water gets into contact with pyrite-laden waste rock, the oxidation that results can acidify the water. All that from just the waste. According to MineWatch NC, the mine's effects on water would also put 300+ private wells at risk. I know many people with private wells, including myself, and the

results of so many people getting cut off from fresh water could be disastrous. Don't let Rise Gold poison our water.

Ind 233-4 Have you thought about how the Idaho-Maryland Mine would affect our life? According to MineWatch NC, the mine would use up **12%** of Nevada County's power, erasing all plans to curb climate change. All the effort that Nevada County has put into conserving energy would go down the drain. That seems like a waste to me. Some people might argue that opening the mine creates many more job opportunities. However, all those workers would have a high risk of getting sick. "National cancer statistics also have shown elevated death rates from

Ind 233-5 cancer—particularly lung, bronchial, and trachea cancer…" (WMAN). Reopening the mine isn't worth it when so many innocent people are at risk. Constant traffic and noise from the mine will wreck our neighborhoods. Some people might say that the tax money from the gold would pay for that. That is incorrect. The mine would cause property values to go down by tens of millions

Ind 233-6 (GoPetition). The trucks the mine would use would wear down the roads, forcing the county to repair them and lose yet more money. In the long run, Nevada County would, eventually, lose money. Save our neighborhoods from the mine.

Ind 233-7 You should say no to the mine because it pollutes our air and water and destroys our well-being. Think about all the people out there with lung diseases. If the mine reopens, those people would be put at risk of getting badly sick. Do you want people to die because of you? I love Nevada County, but if Rise Gold restarts the mine, I will be forced to move. Are you willing to let hundreds of people move away just so you can get a little money? Your decision affects every single person in this community. Thousands of people look to you to make the right decision. Say no to Rise Gold and save our community!

Sincerely,

Elsa Burt

Elsa Burt

INDIVIDUAL LETTER 233: ELSA BURT

Response to Comment Ind 233-1
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 233-2
Potential impacts related to dust generation are discussed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR. In addition, please see Master Response 12 – Chemical Dust Stabilizers and Master Response 20 – Conservatism of Metals Assumptions. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 233-3
Potential impacts related to water quality and groundwater depletion are discussed in Chapter 4.8, Hydrology and Water Quality, of the DEIR. In addition, please see Master Response 16 – Drought and Climate Change and Master Response 35 – Discharge to South Fork Wolf Creek. Please also see Response to Comment Ind 221-1 regarding oxidation and acidification.

Response to Comment Ind 233-4
Please see Master Response 25 – Nevada County Energy Action Plan. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible, nor required.

Response to Comment Ind 233-5
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 233-6
The comment does not address the adequacy of the DEIR. Please see Master Response 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 233-7
Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 234

From: Emilie Rose <emilie@fatandthemoon.com>
Sent: Monday, April 4, 2022 11:57 AM
To: Idaho MMEIR
Subject: ATTN Matt Kelley

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Matt Kelley and team,

I am writing to you in STRONG opposition to the reopening of the Idaho Maryland mine, as I'm sure many of my community members are today.

Ind 234-1 Our community does NOT want or need Idaho Maryland mine to reopen, this would be extremely detrimental and disastrous, as you well know.

Have some humanity, please listen to us, we want to talk, not to fight.

I urge you to take a deep look at what you are doing. Be a human.

Emilie
Creative Cultivation + Marketing

Fat and the Moon
fatandthemoon.com

1

INDIVIDUAL LETTER 234: EMILIE ROSE

Response to Comment Ind 234-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 235

From: Weissman, Emily <Eweissman@nff.org>
Sent: Monday, April 4, 2022 4:42 PM
To: Idaho MMEIR
Cc: Benito Santos
Subject: Comments to Idaho Maryland Mine Environmental Impact Report

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Dear Mr. Kelley,

I am writing to raise my concerns about the proposed Idaho-Maryland Mine and draft EIR. Please note that I had attended the County meeting about the environment impacts of the mine, but had to leave in the afternoon and missed my spot (#102) to speak.

Ind 235-1

My husband and I live at 12300 Allison Ranch Road, which is along Wolf Creek and across from the mine treatment ponds. The EIR outlines so many concerns that will impact myself and my neighbors and community. Here are two concerns which I believe the EIR does not address:

1) I am very concerned about the huge amount of additional treated water that will now flow through Wolf Creek and the treatment ponds on Allison Ranch Road. In reading the EIR, I believe there wasn't sufficient study done on the potential impact to our properties along Wolf Creek if the water treatment system and treatment ponds were to fail due to the heavy volume. Also, I believe there wasn't sufficient study done on whether Wolf Creek can accommodate this heavy volume for the next 80 years. I am worried that if the treatment system and treatment pond were to fail, which can occur sometimes, that those of us living along the creek could have heavy metal contamination in our soil and water.

Ind 235-2

Page. 674 of the EIR states that the "proposed project's construction and operations involve multiple activities that could result in adverse effects on water quality, including but not limited to the discharge of mine water containing iron and manganese, discharge of construction area dewatering water". The report outlines ways to minimize potential water quality impacts, but still says that "the impact is considered significant for the purposes of this analysis and mitigation"

Ind 235-3

2) I believe the EIR should address the very significant impact to property values of our homes, not just homes in the Idaho-Maryland area, but also homes along Wolf Creek. Those of us along Wolf Creek will need to disclose the existence of mining activities next to our houses and this will impact the price of our homes, should we move at some point in the next 80 years or after.

Ind 235-4

My neighbors and community and I are being asked to accept this project which will have significant negative impact on our daily lives, our livelihood, our home values, and potentially our health. I ask you to please consider the community ahead of Rise Gold.

Ind 235-5

Thank you very much and appreciate the feedback process.

Regards,

1

Emily Weissman
12300 Allison Ranch Road

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INDIVIDUAL LETTER 235: EMILY WEISSMAN

Response to Comment Ind 235-1

This comment is introductory and the commenter has concerns about the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 235-2

The commenter is concerned about the discharge of treated water to South Fork Wolf Creek and the treatment ponds on Allison Ranch Road. The commenter also states the DEIR is inadequate in regard to the potential failure of the Brunswick site treatment pond and whether the South Fork Wolf Creek can tolerate the additional flows from the project. Regarding the treatment ponds near the commenter's residence, the project does not propose to discharge water to the treatment ponds on Allison Ranch Road.

Regarding the risk of overflow or the treatment pond failing, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. The total runoff from the 6.4-acre watershed for the pond resulting from a 100-year, 24-hour storm would be approximately 5.7 acre-feet. Thus, as stated on page 4.8-74, the freeboard volume is more than adequate to retain the runoff from an extreme storm event.

The geotechnical stability of the water treatment pond was evaluated in Chapter 3.6 of the DEIR. Mitigation Measure 4.6-3(b) requires the applicant to submit a grading plan, cross sections, and a slope stability analysis of proposed the clay-lined pond dam repair work, for review and approval of the Nevada County Building Department. The submittal shall be prepared and stamped by a licensed geotechnical engineer. The grading plan and cross sections shall depict typical temporary cut slope gradients, excavation depths, maximum water surface elevation, and earthwork volume estimates, and any additional geotechnical engineering methods, such as shoring, to mitigate potential slope instability.

Regarding the water treatment plant and the additional flows to South Fork Wolf Creek, the commenter is referred to Chapter 4.8 and Appendix K.4 of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 235-3

The commenter references Impact 4.8-1 and points out that the DEIR states the impact of referenced activities would be significant. (DEIR, p. 4.8-51.) However, below that conclusion, the DEIR provides Mitigation Measures for Impact 4.8-1, which would reduce the referenced impacts to less than significant. (DEIR, pp. 52-53.)

Response to Comment Ind 235-4

The commenter states the DEIR should address the potentially adverse impact to property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 235-5

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 236

From: Eric Dunn
To: Idaho MMEIR
Subject: Rise Gold Mine Comments
Date: Tuesday, March 15, 2022 8:24:35 AM

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Ind 236-1

District 1 homeowner and full time employee at a local business. We need to learn from the past and stop this mine from moving forward. Any short term gains of wealth be it gold, jobs, taxes, or anything else can be worth the long term detrimental effects of this project. Look no further than Ben Mossman's history of cutting and running in Canada and leaving the local community to deal with the environmental and financial fallout. Do not be so bold as to think that somehow the outcome here will be any different. We don't need more gold. We need clean water. Over 800,000 visit the Yuba each year. This is but a small example of where the true value our community now holds - it's in the nature we are surrounded by. Let's not ruin it.

Sincerely,
--
Eric Dunn
(530) 913-3164
ebdunn@gmail.com

INDIVIDUAL LETTER 236: ERIC DUNN

Response to Comment Ind 236-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 237

Date: April 3, 2022

To: Mr. Matt Kelley, Senior Planner

From: Eric Jorgensen, 11065 Peaceful Valley Road, Nevada City

Re: Idaho Maryland Mine DEIR Public Comment

Hello. I'm a resident of Nevada County and a retired Academic Advisor for the University of California Cooperative Extension. In retirement, my activities include founding of the Greater Champion Neighborhood Association, service as a Fire Safe Council Defensible Space Advisor; and most recently, a member of the Nevada County Energy Action Plan citizen committee.

Ind 237-1

I'm currently opposed to Mine's development as the Mine proposal and County DEIR response fail to adequately address energy consumption, greenhouse gases, and toxic emissions in both plan and mitigation.

Idaho Maryland Mine (Mine) DEIR: 4.3-1 Air Quality, Greenhouse Gases Emissions, and Energy

"4.3-9 Result in the inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency." "LC" (Less than Significant).

The Nevada County Energy Action Plan (EAP) "provides an analysis of the energy use within the unincorporated county limits by the community and County operated facilities as well as a roadmap for accelerating energy efficiency, water efficiency, and renewable energy efforts already underway in Nevada County. It is designed to assist the County in implementing the energy and water-energy related goals and policies in the County's General Plan and Housing Element, and inform the community of cost-effective programs and best practices that will help them save energy and money." The EAP was accepted 5-0 by the Board of Supervisors on February 12th, 2019.

EAPs were also adopted by Grass Valley and Nevada City as part of a State-wide EAP planning process structured to achieve each entity's fair share of the statewide reduction goal established by California Senate Bill (SB) 32, which requires a statewide reduction of 40 percent below 1990 GHG emissions by 2030.

Ind 237-2

The DEIR selects education options within the County's EAP to arrive at "LC". In doing so the DEIR ignores the 3 primary goals and the State's 40% GHG reduction goal. EAP goals are to:

1) "Improve Energy Efficiency in Buildings, Facilities, and County Operations"
2) "Expand the Utilization of Renewable Energy and Resilience Measures" and
3) "Encourage the Efficient and Safe Transportation and Use of Water Resources".

Further the Executive Summary "found that the community - including residential, non-residential, county, and public agencies - consumed 344,045,975 kilowatt hours (kWh) of electricity and 2,943,632 therms of natural gas in 2017. This is a decrease of 2% in electricity use and a decrease of 14% in natural gas use from the 2005 baseline of 349,789,663 kWh and 3,433,874 therms." County operated public lighting energy consumption dropped 11%. Non-residential and non-government electric consumption (industry, manufacturing) dropped 11%. Consumption dropped in all categories but "waste water" energy consumption, which increased 79% and largely offset overall County gains. The Mine proposes to double electric energy consumption for non-residential, industrial – manufacturing uses in the County. How does this energy increase offset GHG emissions?

The **Energy Action Plan** is addressed in the Draft DEIR, but largely dismissed by examination of educational actions, residential solar, etc., rather than examining the intent expressed in the EAP's goals. DEIR Table 4.3-22 Project Consistency with Nevada County Energy Action Plan Energy Reduction. Measures "Encourage energy storage and grid optimization infrastructure projects that support local renewable energy systems and community resilience." This analysis is dismissed as not applicable saying this "Pertains to energy storage and grid optimization infrastructure projects." This dismissal is amplified by "Not applicable to the project because the project consists of mining activity and industrial type development." The EAP goals and delineation of electrical consumption for industry are clear. A doubling of County industrial and business electric energy consumption by the Mine certainly pertains to grid optimization infrastructure projects and County EAP goals. In mitigation measures, the issue of energy backup storage and grid (energy production and delivery) is addressed by carbon credits and diesel backup systems for storage. Alternative solutions are largely ignored.

Impact: "4.3-1 Conflict with or obstruct implementation of the applicable air quality plan." Level "S", after "LS". 4.3-8 Conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs" LCC)Less than Cumulatively Significant). "4.3-9 Result in the inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency." "LC" (Less than Significant). Together these impacts are cumulatively significant as pertains to the County's EAP. There are significant energy alternatives, which are not proposed nor analyzed.

1) A Mine Electric Energy Plan. Require Mine to address consumption and storge backup requirements for development and operation in electrical mechanical operational terms with elimination of diesel. Include in plan electric green energy production requirements or mitigation of GHG in electric production as current plan doubles all current non-residential industrial electrical consumption in the County. A plan would address all energy production and storage components. The planning goal of zero net energy is becoming a standard widely addressed in climate planning by banks, corporations, cities and states. Why not the Idaho Maryland Mine?

Ind 237-3

2) Transport Energy. All above ground and in mine hauling and excavation equipment (trucks, loaders, etc.) be required to be electric. Examples: https://www.epiroc.com/en-us/products/loaders-and-trucks/electric-trucks. The equipment is available and in use. Why not require it in this 80 year project? It will certainly be used inside the mine. Why not on the surface for hauling?
3) Backup Energy. Utilizing stationary diesel generators is recognized as a huge source of GHG emissions. Power generation solutions such as Fuel Cell power products (example: https://www.ballard.com › backup-power-systems) or commercial Battery Power backup systems, (example: https://www.backupbatterypower.com), are compatible and available. Big investments in the wrong products (i.e. diesel trucks and diesel generators) with a mine life of 80 years runs contrary to County's Energy Action Plan and available backup alternatives.
4) Electric Energy Production. In California, approximately 1/3 of greenhouse gas (GHG) emissions are generated from electricity production. Carbon trading is not sufficient to address this issue when proposing to double Nevada County's non-residential electrical consumption. The Mine should develop local solar and wind offsets to mitigate this enormous increase in electrical consumption. Afterall, a mine full of gold can pay for 21st Century climate energy requirements.

5) Grandfather Clauses. The Mine operation of 80 years and construction preparation over the next decade should not be grandfathered into current law, but rather required to meet rapidly changing GHG energy standards. A project of this size and impact should not grandfather in diesel trucks or generators for the life of this equipment. A Mine zero net energy plan would address this.

The County DEIR response to energy consumption, hydrocarbons, and toxic greenhouse gas release is short term in response, dismissive of the County EAP, and uses yesterday's standards for a world requiring rapidly changing standards to address climate impacts and community threat. Please protect Nevada County citizen.

INDIVIDUAL LETTER 237: ERIC JORGENSEN

Response to Comment Ind 237-1

This is an introductory comment. The commenter expresses opposition to the project and states generally that the DEIR fails to address energy consumption, greenhouse gases and toxic emissions, but does not point to specific examples in the DEIR. With regard to the commenter's opposition to the project, please see Master Response 1 - Non-EIR/Administrative issues.

Response to Comment Ind 237-2

As stated on page 4.3-89 of the DEIR, The Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the compliance of the project with EAP strategies has been analyzed and found to be consistent with the EAP. Please see Master Response 26 - Nevada County Energy Action Plan. Batteries are not necessary for the project as they would not avoid or lessen a significant project impact.

Response to Comment Ind 237-3

The commenter asserts that the project's air quality impacts, GHG impacts, and energy use impacts are significant. The commenter then proposes several "energy alternatives" including a net-zero mine electric energy plan, use of all electric vehicles below and above ground, backup energy solutions such as fuel cells and battery power, and onsite electric energy production. All underground equipment and mineral processing will be powered by electricity. The commenter's proposed energy alternatives are not necessary because they would not reduce any significant impact of the project. Please see Master Response 26 - Nevada County Energy Action Plan.

Individual Letter 238

From: Ericha Liberty Woolley <erichaliberty@gmail.com>
Sent: Monday, April 4, 2022 10:45 PM
To: Idaho MMEIR
Subject: personal comment & request on the mine

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Ind 238-1

I grew up living in auburn, often coming up to visit grass valley & nevada city to enjoy the beautiful forest, the lively sweet rivers and streams. After graduating highschool in 2017, a big part of my journey has been to explore other places, communities, cultures along the west coast. In my travels, I have found that I am repeatedly drawn back to this special culture, feeling a strong inspiration to return again and again to this precious land. It's the living beauty of this land & the free thinking, creative & vibrant culture that I find to be so attractive & invite a sense of home. When I heard about the resurrection of this mine, I felt sad to imagine the environmental impacts that the mine would have on the land, water and wildlife.

Ind 238-2

I'm concerned that the proposal, if accepted and put into action, would impact the health of the water including the wells in the area. To honor integrity, it is necessary that the FEIR analyzes all the waterways including wells potentially impacted by the project. The impact analysis on wells in the DEIR is inadequate & underestimates impacts. There also needs to be clarification of the true impact on the local ecology. The discussion of water quality impacts related to loss of wetland vegetation on DEIR page 5-7 is not accurate because potential loss of cover vegetation due to road widening required near the creek is not looked at or mentioned. We need to honor that mitigation should include a 100 foot centerline of creek setback from the construction zone on the road.

Ind 238-3

I would love to see a higher level of integrity & empathy demonstrated through honoring the honest environmental impacts the mine would have, and choosing to not go through with this proposal. With all the efforts and energy that has been going into proposing the rise of the mine, I imagine that if all of that power was to be redirected and invested into regenerative solutions for more sustainable living within this local area, we would reap much better fruits. For example, investing in more money to encourage existing & new local organic farms, introducing more evolved educational strategies within the schools here that include social emotional learning, supporting the youth with fresh locally grown wholesome nutrition, etc. There are so many more important places to be investing time, energy, attention, and resources into that would greatly impact the wellbeing of future generations in an immensely positive way. We need to invest resources into projects that truly consider the mental, emotional, and relational health of the community, along with sustainable, restorative ecological practices and regenerative solutions.

Sincerely,Ericha Liberty Woolleyerichaliberty@gmail.com530 557 5949

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INDIVIDUAL LETTER 238: ERICHA WOOLLEY

Response to Comment Ind 238-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 238-2

The comment expresses a general opinion that the impact analysis on wells in the DEIR is inadequate and underestimates impacts, but does not provide specific examples that would allow for a detailed response. Please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR for information related to impacts on waterways and wells in the area. See also Master Responses 13 through15 that further clarify groundwater concerns. Impacts to local ecology are discussed in Chapter 4.4, Biological Resources, of the DEIR. Specifically, Impact 4.4-3 addresses whether the proposed project would have a substantial adverse effect on riparian habitat or other sensitive natural community, or State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and concluded that with implementation of Mitigation Measures 4.4-3(a) through 4.4-3(d) impacts would be less than significant.

The commenter's reference to page 5-7 is unclear. The commenter is referred to page 4.4-15 of the DEIR, where roadside drainages are discussed along East Bennett Road, and one 0.09-acre roadside wetland along East Bennett Road is identified. As shown in Table 4.4-10 of the DEIR, the roadside wetland will not be impacted by the proposed project improvements.

Response to Comment Ind 238-3

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 239

Dr. Erika Gaylor
11548 Alta Vista Ave
Grass Valley, CA 95945
Email: erikagl@gmail.com

April 3, 2022

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Email: Idaho.MMEIR@co.nevada.ca.us
phone: 530-265-1423

Dear Mr. Kelly:

I am a 10-year Nevada County resident who lives near the proposed Idaho-Maryland Mine project. I own my home in the Alta Street area of downtown Grass Valley and have an 8 year old who attends public school in Grass Valley. I also have family that live near the San Juan Ridge Mine opened by Siskon Mining in 1994 and have seen first-hand the negative impacts of mining on the health and safety of workers, the landscape and environment, and finally the quality and quantity of well water, including the local public school's (Grizzly Hill) well which failed due to mining.

Ind 239-1

Based on my review of the letter that Minewatch/CEA wrote in response to the DEIR, I have the following significant concerns about the proposed Idaho-Maryland mine project:

(1) Re-opening and operating the Mine will have detrimental impacts on the quality of life for local citizens and the ability of the county to continue to grow economically into a desirable community to raise the next generation. It is estimated that these negative impacts will continue for at least the next 80 years and most likely accumulate over time.

Ind 239-2

(2) The DEIR is not a thorough and comprehensive report; thus, it should not be considered definitive.

Ind 239-3

(3) Many community members moved here because of the proximity to nature and outdoor recreation and the corresponding small-town feel and quiet solitude in which to enjoy nature. The report underestimates the impact of the reopening on noise, traffic, air, etc.

Ind 239-4

(4) As a Grass Valley town local, I'm concerned about the impact of reopening the mine on asbestos exposure in the community (in particular, near the mine but also transported to and from the mine), contaminants from the mining of heavy metals, and very importantly, the unknown impact of mining on water quantity and quality. Again, what many people in our community have experienced is acute and long-term negative impacts from mining and this report does not adequately address these real and perceived (but unknown) concerns.

Thank you for your time and consideration.

Sincerely,

Erika Gaylor, Ph.D., Education Researcher, Nevada County Resident

INDIVIDUAL LETTER 239: ERIKA GAYLOR

Response to Comment Ind 239-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 239-2

The comment expresses a general opinion that the DEIR is not a through and comprehensive report, but does not provide specific examples that would allow for a detailed response. Where a comment provides the opinion, preference, or observation of the commenter, without substantiation, this is acknowledged for the record, and no further response is provided. All comments, whether substantiated by facts or simply reflecting the position of the commenter, will be considered by the County throughout the process.

Response to Comment Ind 239-3

The comment does not specifically address the adequacy of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 239-4

Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution. Further information regarding the assumptions used when conducting the Health Risk Assessment for the proposed project is included in Master Responses 20 through 22, including asbestos and metals. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR for information related to impacts on water quality and quantity. Master Responses 13 through 15 provide further clarification on wells and groundwater. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 240

Dist 1

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

Ind 240-1

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a mother I urge you to think about what world we want for out next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

2/16/2022

Erika Johnson
17072 Pine Peak Rd.
Grass Valley, CA 95945

INDIVIDUAL LETTER 240: ERIKA JOHNSON

Response to Comment Ind 240-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 241

From: Erika Neeley <erikajoneeley@gmail.com>
Sent: Monday, April 4, 2022 1:53 PM
To: Idaho MMEIR
Subject: My comment for Idaho Maryland Mine

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Hello,

My name is Erika Neeley and I am a Nevada City resident. I wanted to make sure that I voiced my opinion about the possibility of this mine opening up. I STRONGLY disagree with the idea of a mine reopening in our city, and county. I still see the devastating impacts from previous mines in the area. The polluted waters, the desert like landscaping where they used water for mining, the trash that's been left behind. I know that it will bring down the value of our homes, and bring down the value of life for our local wildlife and environment.

Ind 241-1

The releasing of toxic chemicals from mining polluting our air, we don't need anything else to bring down the quality of our air and water. The DEIR has not done enough to discuss impacts to water quality, they also need to do more to analyze how this will impact our wells, and what they plan to do to mitigate damage. Rise Gold is a new company that has never opened a mine, and never made a profit. How can we trust them to do it 'right' here? Are you willing to let our beautiful city and county be a test ground for their mining? They want to put a toxic hardrock mining plant in the middle of a residential community that goes 24 hrs a day, 7 days a week, for 80 years. Imagine all the things that could go wrong- the impact on that community- the people, the land, the wildlife.

DO NOT open this mine!!! The cons WAY OUT WEIGH the pros of this.

Thank you for listening to the concerns of the people here.

Erika Neeley

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INDIVIDUAL LETTER 241: ERIKA NEELEY

Response to Comment Ind 241-1

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 242

From: Erin Carter <eecartiere@gmail.com>
Sent: Wednesday, March 30, 2022 1:26 PM
To: Idaho MMEIR
Subject: Mine

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Ind 242-1

Please no mine reopening!

Erin Carter
12670 Arbor Lane
Grass valley

"Love your crooked neighbor with all your crooked heart."

- W.H. Auden

INDIVIDUAL LETTER 242: ERIN CARTER

Response to Comment Ind 242-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 243

From: Erin Smith <erinsmith@gmail.com>
Sent: Monday, April 4, 2022 10:25 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: NO to the mine reopening

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Ind 243-1 I am a resident of Nevada county and very concerned about the potential impacts of allowing rise gold to reopen the mine. From everything that I have read it seems like the negative impacts to our community would dramatically outweigh any possible financial benefits, and in the end would only line the pockets of rise gold while our community is left with long term environmental degradation.

Ind 243-2 The fact that this company already has a history of putting profit first and leaving environmental ruin in their wake should be red flag enough!

NO to the mine reopening!

Sincerely,
Erin Smith

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INDIVIDUAL LETTER 243: ERIN SMITH

Response to Comment Ind 243-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 243-2

Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 244

Dist 3

RECEIVED
MAR 0 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA. 95959
March 1, 2022

Dear Supervisors Hall, Scofield, Miller, Hoek, and Bullock
I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I have listened to and researched the arguments from Rise Gold Mine. They continue to talk about how it will benefit our community, but shy away from the possible negative impacts a project of this size could/will have on our County.

Starting in 2021, as I drive around our local communities, I see very large building projects. Homes and apartments under construction on Ridge Road, Alta Street, Old Tunnel Road, at the intersections of Ridge Road and Gold Flat, and the monster project at Dorsey and Sutton Way. These projects were approved by you, so you have deemed them valuable and necessary for the improvement of the Nevada County citizens. You have considered the traffic, and water needs for these projects.

Ind 244-1

Now you are asked to put these projects and our current homes and business at risk of not having enough water because the Idaho-Maryland Mine Project is going to need more water than is being realized. It is also hard to imagine that the mine is going to produce the number of jobs that Rise Gold is calming.
I encourage you to vote against this project and protect the community and citizens of Nevada County.
Sincerely,

Eugene E. Gilligan
334 S. School Street Apt A
Grass Valley, CA. 95945
geegill116@yahoo.com

INDIVIDUAL LETTER 244: EUGENE GILLIGAN

Response to Comment Ind 244-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 245

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA. 95959
March 1, 2022

Dear Commissioners Milman, Duncan, Ingram, Mastrodonato, and Greeno
I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I have listened to and researched the arguments from Rise Gold Mine. They continue to talk about how it will benefit our community, but shy away from the possible negative impacts a project of this size could/will have on our County.

Starting in 2021, as I drive around our local communities, I see very large building projects. Homes and apartments under construction on Ridge Road, Alta Street, Old Tunnel Road, at the intersections of Ridge Road and Gold Flat, and the monster project at Dorsey and Sutton Way. These projects were approved by you, so you have deemed them valuable and necessary for the improvement of the Nevada County citizens. You have considered the traffic, and water needs for these projects.

Ind 245-1

Now you are asked to put these projects and our current homes and business at risk of not having enough water because the Idaho-Maryland Mine Project is going to need more water than is being realized. It is also hard to imagine that the mine is going to produce the number of jobs that Rise Gold is calming.
I encourage you to vote against this project and protect the community and citizens of Nevada County.
Sincerely,

Eugene E. Gilligan
334 S. School Street Apt A
Grass Valley, CA. 95945
geegill116@yahoo.com

RECEIVED
MAR 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 245: EUGENE GILLIGAN

Response to Comment Ind 245-1

See Response to Comment Ind 244-1.

Individual Letter 246

From: Eva Saelens <incaore@gmail.com>
Sent: Monday, April 4, 2022 12:51 PM
To: Idaho MMEIR
Subject: NO MINE!

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To whom it may concern,
I am a homeowner in Grass Valley in the You Bet area. My husband grew up in Colfax but we relocated to Grass Valley from Oakland two years ago.

Ind 246-1

We are extremely concerned with the environmental impact of the proposed gold mine. We are passionate about healing and honoring the beautiful ecosystem we call home. The impact of fires and drought are a tremendous stressor on this ecosystem, and it stands to get worse, according to scientists. The environmental report does not properly take these stressors into account. Fires and drought could very well be much worse than are currently projected.

We simply cannot risk this project in a delicate, rapidly changing region.

We must protect these lands. Please don't choose gold over the appropriate conservation behaviors that this cherished and troubled landscape deserves. Every living thing deserves better than this pathetic scheme.

Thank you
Eva Saelens

Sent from my iPhone

INDIVIDUAL LETTER 246: EVA SAELENS

Response to Comment Ind 246-1

Please see Master Response 1 – Non-EIR/Administrative Issues, as well as Master Response 16 – Drought & Climate Change, and Master Response 6 – Wildfire Impacts. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 247

From: Eva Saelens
To: bdofsupervisors
Subject: Passionate NO on the gold mine
Date: Tuesday, February 15, 2022 10:01:47 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Nevada County Supervisors,
Our family is asking that you strongly reject the Rise Gold proposal to re-open the Idaho-Maryland Mine. We urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

Ind 247-1

We are a family who recently relocated to the area from the Bay Area but my husband is from Weimar and went to Colfax High. We came back to this area because we are passionate about the ecosystem and consider the natural beauty of the foothills to be our greatest wealth. We feel a spiritual commitment to the healing of this land after gold mining's dirty and cruel legacy. We feel that we have a responsibility to make it right and to take indigenous responsibility into consideration when in relationship to this land.

This gold mine is a nightmare and continues the legacy of pain that this region still suffers from. We don't need this mine. We don't need the many problems that will spring from it. Please don't make the horrible mistake of falling for Rise Gold's song and dance. This is a supremely divine place and we must fight the instincts of those who want to exploit it.

Thank you
Eva Saelens
Wild Life Lane 95945

Sent from my iPhone

INDIVIDUAL LETTER 247: EVA SAELENS

Response to Comment Ind 247-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 248

Evelyn Soltero, MS
20405 Farrell Dr.
Penn Valley, CA 95946
residentialwells@gmail.com
April 4, 2022

Sue Hoek, District 4
Nevada County Board of Supervisors
bdofsupervisors@co.nevada.ca.us

Nevada County Planning Department
Idaho.mmeir@co.nevada.ca.us

RE: Idaho Maryland Mine EIR Commentary

Dear Sue Hoek and Nevada County Board of Supervisors,

Ind 248-1 I oppose the opening of the Idaho Maryland Mine for myriad reasons- a lack of professionalism on behalf of Rise Gold, the sheer absurdity of removing millions of gallons of groundwater in a mega drought (LA Times February 2021; Nature Climate Change, February 2021), the claim that the mine water is "immune" from the drought, and the resulting catastrophic erosion events from the discharge of 850gpm into South Wolf Creek potentially mobilizing mercury into the greater Wolf Creek Watershed.

Also at risk is the available groundwater below the town of Grass Valley, CA. According to California's State Water Board,

Ind 248-2

> Groundwater pumping can locally exceed recharge from rainfall, percolation through streams, and other sources. Excessive groundwater pumping can overdraft aquifers, emptying them faster than natural systems can replenish them. Overdraft can result in wells going dry,... depletion of surface water supplies, and cause the land to collapse (i.e., subsidence).
>
> Ensuring sustainable management of groundwater's quality and quantity is essential for meeting California's future water supply needs. Climate change and the threat of prolonged drought highlights the need for improving groundwater recharge and storage in some groundwater basins, and protecting or restoring groundwater quality and quantity throughout the state.
>
> The close connections between groundwater and surface water in land use, human activity, water quality, and water suppliers must be coordinated and communicated to promote wise, balanced, and sustainable use of California's groundwater resources.
> https://www.waterboards.ca.gov/water_issues/programs/groundwater/gw_basics.html

1

Thus, I find the current Draft EIR scientifically unsound. In addition to my concerns above, please address these issues:

1.Nevada Irrigation District treated water supply to dewatered residences:

a)*Address the discrepancy between Nevada County's requirement for the Certificate of Occupancy, where the

"well can produce at least 3.0 gallons per minute sustained production rate. The well ordinance will grant approval for the Certificate of Occupancy for well production as low at 1.5 gallons per minute with a required minimum 1000 gallon holding tank" (mynevadacounty.com)

and Nevada County Irrigation District provided a use factor of 0.4 gallons per minute (gpm)/dwelling unit. This use factor was provided by e-mail from Tonia Herrera, Nevada Irrigation District, July 22, 2020.

Ind 248-3

b)A maximum of 31 dwelling units to be connected to the District pipeline, if dewatered or experiencing non-potable water.

*What are the provisions for dewatered domestic wells above and beyond the suggested maximum of 31?

*How were the 31 dwelling units determined

*How were the hydrogeologic factors, unique to these 31 well settings, used to determine the spatial and temporal variances in these 31 wells?

*How was specific rock type and relative storativity and transmissivity applied?

*How was the resulting cone of depression interpreted?

c)Average depth of Nevada County wells approximates 400ft.

Ind 248-4

*Since dewatering and drilling will take place within this zone, explain how it was determined that only 31 wells would be dewatered?

*Address why more wells both within the Rise Gold operational footprint and outside the mining property boundaries would not be affected.

2.Dewatering millions of gallons of groundwater from below the town of Grass Valley, CA.

Ind 248-5

a)Address the inability to fully assess available groundwater in fractured rock.

b)Address the nature of recharge to fractured rocks in mega drought settings. (LA Times February 2021; Nature Climate Change, February 2021)

Ind 248-6

c)Address the stresses on groundwater and surface water connectivity when under creating rapid draw down of millions of gallons of groundwater per day in the first 6 months, and then the approximate one million gallons of groundwater removal per day thereafter.

Ind 248-7

d)How did the dewatering assessment address the potential for a region-wide dewatering based on an active cone of depression from daily withdraw of millions of gallons of groundwater for 80 years?

Ind 248-8

e)Explain why the millions of gallons of groundwater removed from the mine "should be immune from drought years", according to the Raney Planning and Management Idaho Maryland Mine Water Supply Assessment Dec 2021, pg. 23.

2

3.Causative Results from dewatering millions of gallons of groundwater from below the town of Grass Valley, CA.

a)Address the removal of millions of gallons of groundwater as it relates to California State Water Boards' directive to protect available groundwater resources:
"Ensuring sustainable management of groundwater's quality and quantity is essential for meeting California's future water supply needs. Climate change and the threat of prolonged drought highlights the need for improving groundwater recharge and storage in some groundwater basins, and protecting or restoring groundwater quality and quantity throughout the state. The close connections between groundwater and surface water in land use, human activity, water quality, and water suppliers must be coordinated and communicated to promote wise, balanced, and sustainable use of California's groundwater resources."
(https://www.waterboards.ca.gov/water_issues/programs/groundwater/gw_basics.html)

Ind 248-9

Ind 248-10 b)Address the potential for mobilizing mercury and increasing erosion when discharging 850gpm into South Wolf Creek.

Ind 248-11 c)Address the potential for an increase in fire risk due to decline in forest health as result of dewatering millions of gallons of water from below the town of Grass Valley, CA.

Ind 248-12 d)Address the potential for increased seismicity in our county due to rapid extraction of millions of gallons of groundwater (Amos et al, 2014, doi:10.1038/nature13275)

Ind 248-13 e)Address the potential for subsidence of residences and roadways due to rapid extraction of millions of gallons of groundwater. (Amos et al, 2014, doi:10.1038/nature13275)

Thank you for your time and consideration on these important factors.

Sincerely,

Evelyn Soltero

Evelyn Soltero
residentialwells@gmail.com
530.210.9508

3

INDIVIDUAL LETTER 248: EVELYN SOLTERO

Response to Comment Ind 248-1

The commenter opposes the project, asserts that Rise Gold lacks professionalism, and opposes dewatering the mine in a "mega drought". Further, the commenter states that it disagrees that the mine is "immune" from the drought and asserts that the project will result in catastrophic erosion events from the discharge of 850gpm into South Fork Wolf Creek, potentially mobilizing mercury. With regard to the commenter's opposition to the project, please see Master Response 1 – Non-EIR/Administrative Issues. Contrary to the commenter's statement, the DEIR states that based on the water level monitoring data from private domestic wells (presented in Appendix B of Appendix K.2 of the DEIR), the amount of recharge appears to be consistent from year to year and is not substantially affected by drought or wet cycles (Chapter 4.8 at page 4.8-12) and that there are no apparent annual variations in groundwater levels due to drought or above-normal rainfall years (Chapter 4.8 at page 4.8-11).

In addition, the commenter does not provide any data or evidence to support the assertions that dewatering the mine and discharging treated water to South Fork Wolf Creek would cause "catastrophic" erosion or mobilize mercury. The geomorphology study presented in Appendix K.1 of the DEIR demonstrates that peak storm flows that exceed the discharge rate to South Fork Wolf Creek are normal events and have not caused excessive erosion. Laboratory analytical data presented in Appendix K.2 of the DEIR do not provide any evidence of the presence of mercury in the materials to be mined or within the South Fork Wolf Creek watershed in the project area. Please see Master Response 36 – Flows in South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 248-2

The potential effects of groundwater pumping are addressed in detail in Appendix K.2 and Appendix K.3 of the DEIR and in Section 4.8.4 of the DEIR. California Department of Water Resources' planning requirements related to sustainable groundwater management are identified as part of the Regulatory Context in Section 4.8.3 of the DEIR.

The commenter does not provide any specific data or evidence related to the risk to groundwater below the town of Grass Valley, CA, as stated in this comment. In particular, there is no evidence available to support the assertion that the project would cause "overdraft" of local groundwater supplies. Regardless, the DEIR concludes that there may be a potentially significant impact on the water supply in individual wells and provides mitigation requirements to address such impacts if they occur. (see Mitigation Measures 4.8-2(a) through 4.8-2(c).)

Response to Comment Ind 248-3

The certificate of occupancy requirements and NID's use factor are parts of unrelated regulatory requirements that apply to different water supply sources. The commenter's questions about these requirements do not relate to the adequacy of the DEIR.

The commenter asks how the number of parcels to be connected to NID service was determined, and what would occur if additional domestic wells were impacted. The number of hookups to NID water service in the E. Bennett area is shown to be 30, not 31, in the evaluation of Impact 4.8-2 in the DEIR. The number of initial connections is based on the number of parcels in that area, as shown on Figure 1 and in Table 1 of the Well Mitigation Plan, which is Appendix K.9 of the DEIR. Mitigation Measures 4.8-2(a) and 4.8-2(b) describe the procedures to be followed to determine whether additional wells become impacted and the actions that must be taken to mitigate those impacts, if they occur. Please also see Master Response 15 – Adequacy of Groundwater

Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The commenter also asks questions regarding the hydrogeologic factors used to determine the zone of dewatering impact. The hydrogeologic factors used in the analysis are described in Appendix K.2 and Appendix K.3 of the DEIR. These studies provide substantial evidence on dewatering impacts, and the impact analysis in the DEIR relies upon these studies and the independent, third-party peer review described in Section 4.8.4 of the DEIR, at pages 4.8-40 to 4.8-41.

Response to Comment Ind 248-4

The commenter states that the average depth of Nevada County wells is approximately 400 ft, and then asks why only 31 wells will be impacted. The number of wells that are expected to be impacted was based on a groundwater model (see Appendix K.3 of the DEIR), and a threshold of 10%, such that a reduction in water column in a groundwater well of 10% or more was considered to be a significant impact (see Section 4.2 of Appendix K.2). Only 7 wells were found to have a significant impact based on the 10% threshold as applied to the dewatering drawdown calculated by the groundwater model. The DEIR requires mitigation, including connecting 30 parcels to NID potable water supply, even though only 7 wells were predicted to be potentially impacted. In response to commenter's questions, more wells are not expected to be impacted because the groundwater model did not predict a reduction in water level over 10% for those wells. The actual depths of the wells considered in the evaluations that support the DEIR are shown in Tables 4-1 through 4-4 of Appendix K.2 of the DEIR. The well locations are shown on Sheet 12 of Appendix K.2 of the DEIR and Figure 2-6 of Appendix K.3 of the DEIR.

Potential dewatering effects in the operation and perimeter areas are discussed in Appendix K.2 and Appendix K.3 of the DEIR.

Response to Comment Ind 248-5

The commenter asks the County to address the assessment of available groundwater in fractured rock and address the nature of recharge to fractured rock in drought settings. Fractured bedrock conditions are discussed in Section 4.8.1 of the DEIR (at page 4.8-8), in Appendix K.2 of the DEIR throughout Section 3.3, and in Section 2.0 of Appendix K.3 of the DEIR.

Recharge of the fractured bedrock is discussed in Section 3.3 of Appendix K.2 of the DEIR. Water level hydrographs from numerous wells in the project vicinity show that the amount of recharge each year is relatively constant since almost all of the wells maintain a consistent magnitude of seasonal fluctuation from year to year and there are no long-term trends observed in most of the wells that can be correlated to variations in annual water-year rainfall.

Response to Comment Ind 248-6

The commenter asks about the impacts of the project's proposed dewatering on groundwater and surface water connectivity. Section 5.3 of Appendix K.3 of the DEIR and Section 4.1 of Appendix K.2 of the DEIR discuss project effects on surface water, including effects related to lowering of groundwater levels. It is important to note that any reduction in surface water flows in the South Fork Wolf Creek watershed would be more than offset by the discharge of treated water. Flow reductions would also occur in Wolf Creek because the drains would no longer discharge while the mine workings were dewatered. As described in Section 4.3 of Appendix K.2 of the DEIR, the

loss of drain flow to Wolf Creek would be in the range of 0.13 cubic feet per second (cfs) to 0.16 cfs, while the base flow in Wolf Creek ranges from 10 cfs to 50 cfs. Thus, the reduction in flows in Wolf Creek would be de minimis.

Response to Comment Ind 248-7

The commenter asks how the DEIR assessed the potential for a region-wide dewatering based on the cone of depression caused by the project. The assessment's approach to evaluating a potential region-wide drawdown cone is described in Section 4.2.2 of Appendix K.2 of the DEIR and in Sections 4.3 through 4.5 of Appendix K.3 of the DEIR. To evaluate a region-wide potential drawdown cone, the bulk fractured bedrock was assumed to be isotropic and homogeneous on a very large scale, consistent with a region-wide analysis. For more localized conditions related to individual wells, a somewhat different approach and set of assumptions were used, as described in Section 4.2 of Appendix K.2 of the DEIR.

Response to Comment Ind 248-8

The commenter states that it disagrees that the mine is "immune" from the drought. As described in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations that may range from 10 feet to 50 feet between wet and dry times of the year but remain relatively consistent from year to year within each individual well. During the monitoring period, several years with below normal rainfall occurred (2001, 2004, and 2007), multiple years with above normal rainfall occurred (1995-1998 and 2006), and several years of near-normal rainfall occurred (1999, 2000, 2002, 2003, 2005). Despite large variations in annual rainfall from year to year, the seasonal water level cycles in individual wells remain consistent over time and the overall water levels shown on the hydrographs for each well do not fluctuate based on wet or dry climatic cycles. Based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge, as described in Section 3.2, appears to be consistent from year to year and is not affected substantially by drought or wet cycles. The referenced statement is made on page 2 and page 18 of the Raney Water Supply Assessment, which is Appendix N of the DEIR, not page 23 as stated in the comment. Please also see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 248-9

California Department of Water Resources' planning requirements related to sustainable groundwater management are identified as part of the Regulatory Context in Section 4.8.3 of the DEIR. The potential effects of groundwater pumping are addressed in detail in Appendix K.2 and Appendix K.3 of the DEIR and in Section 4.8.4 of the DEIR.

Please also see Response to Comment Ind 248-2.

Response to Comment Ind 248-10

The commenter asks about the potential for mobilizing mercury in South Fork Wolf Creek. The geomorphology study presented in Appendix K.1 of the DEIR demonstrates that peak storm flows that exceed the discharge rate to South Fork Wolf Creek are normal events and have not caused excessive erosion. Laboratory analytical data presented in Appendix K.2 of the DEIR do not provide any evidence of the presence of mercury in the materials to be mined or within the South Fork Wolf Creek watershed in the project area. Please see Master Response 36 - Flows in South Fork Wolf Creek. As the project is not expected to cause significant erosion impacts and there is no evidence of mercury in the watershed or project area, there is no potential for impacts related to mobilization of mercury.

Please also see Response to Comment Ind 248-1.

Response to Comment Ind 248-11

Please see Master Response 33 – Groundwater Dependent Vegetation. As stated on page 4.13-21 of the DEIR, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels.

Response to Comment Ind 248-12

The reference cited in this comment (Amos et al., 2014, DOI:10.1038/nature13275 – abstract available at https://pubmed.ncbi.nlm.nih.gov/24828048/) specifically relates to alluvial aquifers within the Central Valley of California. Please see Response to Comment Grp 8-51 regarding the expected rate of drop in water levels in the mine.

Response to Comment Ind 248-13

The reference cited in this comment (Amos et al., 2014, DOI:10.1038/nature13275 – abstract available at https://pubmed.ncbi.nlm.nih.gov/24828048/) specifically relates to alluvial aquifers within the Central Valley of California. The California Department of Water Resources has specifically identified the potential for subsidence due to groundwater extraction to be related to irreversible compaction and consolidation of sedimentary clay layers between alluvial aquifer units within sedimentary groundwater basins (California's Groundwater, Department of Water Resources Bulletin 118, January 1994, pages 118-119, and Bulletin 118 2020 Update, page 5-20, available at https://data.cnra.ca.gov/dataset/calgw_update2020/resource/d2b45d3c-52c0-45ba-b92a-fb3c90c1d4be). Such conditions do not apply to the bedrock conditions in the project vicinity. In fact, the reference cited in this comment concludes that the reduction in mass within the land surface due to groundwater extraction has actually resulted in uplift, not subsidence, in the Sierra Nevada bedrock surrounding the Central Valley.

Individual Letter 249

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-5 P31 104**********ECRLOT**B001
Fernando Garcia Rojo
PO Box 47
Cedar Ridge, CA 95924-0047

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MAR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

Ind 249-1



Please fill out and send back to us your support for the Idaho-Maryland Mine

WE OPPOSE

I support re-opening the Idaho-Maryland Mine

NO MINE!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) FERNANDO & ROJO - NANCY ROJO
Address PO BOX 47 ZIP 95924
Phone 5302747336
Email Address nancytrojo@gmail.com

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

ALL LIES!

DEIR CONFIRMS: Mine will NOT drain local wells, will not cause water quality or air quality impacts.



Concerns about mining impacts to local wells, water and air quality have been put to rest by the county's independent Environmental Impact Report. The Draft EIR confirms that the wells will NOT be adversely impacted outside of the E. Bennett area above the mine. Rise Grass Valley will install a new NID potable waterline to the E. Bennett area - paid for in full by RGV. In addition, studies released in the Draft EIR confirm no significant impact to water quality, air quality, public health or traffic.

LIES

YOUR SUPPORT IS CRITICAL

Tell the Board of Supervisors that you support Rise Grass Valley's re-opening of the Idaho-Maryland Mine.

Please fill out and return the attached postcard today!

1. **Detach the support card on the right and fill out the reverse side.**
   We'll use these cards later to show the Board of Supervisors the strong support throughout the community for re-opening the Idaho-Maryland Mine.
2. Visit RiseGrassValley.Com for complete project details. Use our **"Take Action"** tool to send a message directly to the County Board of Supervisors through our website.

RISE GRASS VALLEY

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

INDIVIDUAL LETTER 249: FERNANDO AND NANCY ROJO

Response to Comment Ind 249-1

The comment does not address the adequacy of the. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 250

From: Florence Jacquet
To: bdofsupervisors
Subject: No Mine
Date: Wednesday, March 23, 2022 2:48:33 PM

Dist 1

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Hi,

Ind 250-1

My name is Florence Themelis, I live in Forest Knolls, Nevada city. I oppose the reopening of the mine as digging will happen directly under my neighborhood. Why are we considering the reopening of a mine under a town full of people? It's just pure madness. We live in a beautiful community and the mine will destroy it.
We're talking a mine operating 24hrs/a day, 7 days a week for 100 years! No more peace during the day, no more sleep at night. I worked very hard to pay for my home, and my property value will plummet if the mine reopens.

Ind 250-2

We keep experiencing very serious droughts, it keeps getting worse, we're told to save water year after year. Somehow the reopening of the mine which will waste billions and trillions of gallons of water is considered?? We can live without gold, not water!
We're extremely lucky to have beautiful swimmable rivers. We moved here because of it. We can't let the mine pollute our creeks and rivers.
The destruction the mine reopening will do can NEVER be undone.
Please say NO to the reopening of the mine.
Thank you.
Florence THEMELIS.

INDIVIDUAL LETTER 250: FLORENCE THEMEMLIS

Response to Comment Ind 250-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 250-2

Please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR for information related to impacts on water usage and water quality. Please also see Master Responses 13 through 16 regarding groundwater and Master Response 35 – Discharge to South Fork Wolf Creek. The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 251

Idaho Maryland Mine

If the mine were to reopen we would lose basic qualities of life that we have been accustomed to living here in the Nevada City area.

Ind 251-1

Areas of Concern:
NOISE
WATER
AIR

Back in the early/mid 80's there was an effort to reopen the Lava Cap mine. The mining company had a crew out to our home on Banner to measure the depth of our well. They said basically "that there are 16 different reasons for a well to go dry and only one of them is mining. So, you prove it". We lucked out; the mine reopening was voted down. Will we be so lucky again?

Ind 251-2

QUALITY OF LIFE: All of this is going to affect tourism. Having mining vehicles and miners on the streets. Additional traffic on the roads and highways. I have heard that we have been called the jewel of the Sierra. I think with the mining we would lose that distinction.

Ind 251-3

Frank Gould
207 Upper Park Ave
Nevada City CA 95959

INDIVIDUAL LETTER 251: FRANK GOULD

Response to Comment Ind 251-1

The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 2.

Response to Comment Ind 251-2

The comment does not address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 251-3

The comment does not specifically address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 252

LAW OFFICE OF FRANK LAWRENCE

Frank Lawrence
Tel. (530) 478-0703
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Zehava Zevit, Of Counsel
Tel. (323) 287-5772
zehava@franklawrence.com

April 4, 2022

Nevada County Planning Department
Attention Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959

Via Email: matt.kelley@co.nevada.ca.us; idaho.mmeir@co.nevada.ca.us

Re: Comments on the Draft Environmental Impact Report, Idaho-Maryland Mine Project

Dear Nevada County Planning Department:

I am a 23-year resident of Nevada County, and hereby respectfully submit these comments on the Draft Environmental Impact Report ("DEIR") for the proposed re-opening of the Idaho-Maryland Mine ("Project" or "Mine"). The DEIR is deficient in countless ways. The DEIR's analysis of the Project's impacts on water quality and quantity – particularly in the midst of the worst drought in this area in 1200 years, *see* https://www.nature.com/articles/s41558-022-01290-z and https://www.nytimes.com/2022/04/04/opinion/environment/california-drought-wildfires.html -- is woefully inadequate. The same is true for the impacts on air quality and public health, environmental hazards and hazardous materials, waste management, seismic hazards, greenhouse gas emissions, biological and aquatic resources, aesthetics, traffic, and noise pollution, among many other issues. The DEIR's proposed mitigation measures for all these impacts are wholly inadequate. The DEIR's overwhelming deficits have been documented by others in extensive comments, specifically including those of the Community Environmental Advocates, which I incorporate by this reference as if fully set forth herein.

Ind 252-1

As a lawyer with more than 30 years of experience representing Indian tribes in California, I will focus my comments on the DEIR's insufficiency with respect to the Nevada City Rancheria Nisenan Tribe ("Tribe"). The Project proponent and the County's environmental consultant failed entirely to consult with the Tribe. The Tribe recently was added to the California Native American Heritage Commission's Tribal Consultation List and is therefore entitled to meaningful consultation as a matter of State law, including SB 18, AB 52, and provisions of the California Environmental Quality Act ("CEQA"). *See, e.g.*, Cal. Pub. Res. Code §§ 21074, 21080-21084; Governor's Office of Planning and Research, *Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA* (June 2017) (available at https://www.google.com/search?q=CEQA+consultation+requirements&client=firefox-b-1-

Ind 252-2

d&channel=tus5&ei=0EFLYpWFHdqgkPIPpM2c-AM&ved=0ahUKEwiVrf2njfv2AhVaEEQIHaQmBz8Q4dUDCA0&uact=5&oq=CEQA+consultation+requirements&gs_lcp=Cgdnd3Mtd2l6EAM6BAgAEEdKBAhBGABKBAhGGABQ-QVYkQxgrQ9oAHACeACAAVqIAawBkgEBMpgBAKABAcgBCMABAQ&sclient=gws-wiz). The DEIR recites that its authors sought to contact the Tribe, but that half-hearted, feeble effort fails to meet CEQA's requirements, policies, or purposes requiring ***meaningful*** consultation. Indeed, the DEIR's Ethnographic Overview ***fails to even acknowledge the present-day existence of the Tribe and its members***. *See* DEIR p. 4.5-2. In fact, the Nisenan people have existed here since time immemorial, and this century has seen a revitalization of the Tribe's governmental and cultural activities. *See* https://www.nevadacityrancheria.org/.

The Legislature provided in Assembly Bill 52 that:

"In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following: (1) Recognize that California Native American prehistoric, ***historic***, archaeological, cultural, and sacred places are ***essential elements in tribal cultural traditions, heritages, and identities***. (2) Establish a new category of resources in the California Environmental Quality Act called "tribal cultural resources" that considers the ***tribal cultural values*** in addition to the scientific and archaeological values when determining impacts and mitigation. (3) Establish examples of mitigation measures for tribal cultural resources that uphold the ***existing mitigation preference for historical and archaeological resources of preservation in place***, if feasible. (4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because the California Environmental Quality Act calls for a sufficient degree of analysis, ***tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects*** that may have a significant impact on those resources. (5) In recognition of their governmental status, establish a ***meaningful consultation*** process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the California Environmental Quality Act environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision making body of the lead agency. (6) Recognize the ***unique history of California Native American tribes*** and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to the California Environmental Quality Act (Division 13 (commencing with § 21000) of the Public Resources Code). (7) Ensure that local and ***tribal governments***, public agencies, and project proponents ***have information available, early in the California Environmental Quality Act environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources*** and to reduce the potential for

delay and conflicts in the environmental review process. (8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources. (9) Establish that a substantial ***adverse change to a tribal cultural resource has a significant effect on the environment***."

AB 52, § 1 (Gatto, 2014) (emphasis added). Nevertheless, ***without any Tribal consultation whatsoever***, the DEIR simply concludes that "Tribal Cultural Resources were not identified for the project site." DEIR p. 4.5-11.

Ind 252-3

The utter lack of Tribal consultation also fails to meet the promises the County made to the Tribe in Resolution No. 20-533 "recognizing the Nevada City Rancheria Nisenan Tribe's historical, cultural and continued significance to Nevada County and California …." *Id.* In that Resolution, the County recognized that gold mining here led to "the displacement of the Tribe and its members." *Id.* The County also acknowledged the "Tribe's continuous existence as an indigenous tribe in Nevada County, and further recognizes the Tribe's historical, cultural and continued significance to Nevada County and California." The County also "supports ***future collaboration and agreement between the County and the Tribe*** that strengthen each of their governments, for their mutual benefit and to ***ensure that local land use impacts on tribal and county governments, including their citizenry, services, lands, and infrastructure, are maintained and mitigated for the benefit of all***." *Id.* (emphasis added).

Ind 252-4

The DEIR fails entirely to assess the Mine's impacts -- historical, present, and future -- on the Tribe, its members, its ancestral lands, and its cultural resources. It fails to assess the theft of Tribal water resources and ancestral lands, the loss of hunting and gathering grounds, and impacts on Tribal cultural resources caused by the Mine and that will be perpetuated by the Mine's proposed re-opening. Moreover, the DEIR fails to assess the Mine's impacts in causing and perpetuating the genocide against the Tribe and its members, as well as the related impacts of the proposed Mine re-opening, including the badges and incidents of the genocide and its lingering intergenerational trauma. There are no mitigation measures proposed to compensate the Tribe for the genocide and its continuing impacts on the Tribe, its members, its lands, and its cultural resources. Indeed, as noted in the U.S. National Archives and Records Administration, California's gold rush was in significant part responsible for the failure to ratify the California Indian treaties, including the Camp Union Treaty of 1851, to which the Tribe's ancestral leader was a signatory. *See* L. Miller, *The Secret Treaties with California Indians*, https://www.archives.gov/files/publications/prologue/2013/fall-winter/treaties.pdf ("in the wake of the gold rush, white Californians strongly objected to the treaties"). The Mine is responsible for the theft of the Tribe' ancestral lands, and the proposal to re-open it must include mitigation for that calamitous impact.

Ind 252-5

The DEIR lacks the information and analysis required to identify all the Mine's potentially significant impacts on the Tribe, its members, and its ancestral homelands, and its cultural resources. As noted by other commentors, the DEIR also lacks an accurate Project description, relies on an incomplete baseline for evaluating the Project's environmental impacts, lacks data and analyses needed to make informed determinations, underestimates or omits impacts and fails to provide effective and feasible mitigation measures.

Ind 252-6

The DEIR fails to satisfy CEQA's requirements. It also fails to meet the County's obligations to the Tribe undertaken in Resolution No. 20-533. The Tribe has the right under State and County law to be fully and meaningfully consulted on the Project. The DEIR must at a minimum be revised accordingly and recirculated, with a full analysis of the Mine's impacts on the Tribe, its members, its ancestral lands, and its Tribal cultural resources. The revised DEIR must propose meaningful mitigation for the badges and incidents of the genocide, the theft of Tribal ancestral lands, the theft and destruction of Tribal natural and cultural resources, and the destruction of the Tribe's traditional way of life.

Sincerely,

Frank Lawrence, Esq.

www.franklawrence.com 578 Sutton Way | No. 246 | Grass Valley, CA 95945

INDIVIDUAL LETTER 252: FRANK LAWRENCE

Response to Comment Ind 252-1

Commenter alleges the DEIR is deficient in "countless ways," briefly lists multiple resource areas and generally states that the proposed mitigation measures are inadequate, citing comments of Community Environmental Advocates. The comment is introductory in nature and alleges no specific defects, requiring no specific response from the County. To the extent the commenter incorporates the comments from Community Environmental Advocates, the commenter is referred to the County's responses to Group Letter 7 and Group Letter 8.

Response to Comment Ind 252-2

Please see Response to Comment Grp 14-2.

Response to Comment Ind 252-3

Please see Responses to Comments Grp 14-2 and Grp 14-3.

Response to Comment Ind 252-4

All cultural resources impacts are fully disclosed in Chapter 4.5 of the DEIR, which addresses known historic and archaeological resources in the project vicinity, as well as the potential for previously unknown resources to occur within the overall project site. (DEIR p. 4.5-1.) Additionally, the Nisenan Tribe is specifically cited in the Ethnographic Overview (DEIR p. 4.5-2) and Mitigation Measure 4.5-3 (DEIR p. 4.5-31) pertains to potential human remains. Importantly, the project does not propose taking any water or land owned by the Tribe or its members and the commenter does not provide any citation or evidence that the project would take either water or land owned by the Tribe or its members or that the Project Proponent's property is currently a hunting or gathering ground for the Nisenan Tribe.

Finally, the commenter was not specific as to any allegation against the project or the Project Proponent of damage or harm to the Nisenan Tribe or its members. As required by Section 15121 of the CEQA Guidelines, the EIR will (a) inform public agency decisionmakers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. (DEIR p. 1-2.) In other words, CEQA is concerned with a project's impact on the environment, and not "lingering intergenerational trauma" not associated with this project. Rather, the commenter cites to general allegations that the California gold rush, as opposed to the proposed project, was responsible for California not ratifying various treaties. The DEIR does, however, acknowledge that traditional lifeways were disrupted and Native people were displaced with the onset of the Gold Rush in the mid-nineteenth century. (DEIR 4.5-2.) Aside from the current project's impacts to any cultural resources on the project site, the remainder of the cited issues are not environmental concerns recognized by CEQA. No further comment required.

Response to Comment Ind 252-5

Commenter states that the DEIR does not identify the project's potentially significant impacts on the Tribe, its members, homelands and cultural resources. Commenter also alleges that the Project Description is not accurate and relies on an "incomplete baseline" and does not provide feasible mitigation measures.

The scope of an EIR is limited to a local agency's evaluation of potentially significant environmental impacts of a project, which by definition are limited to physical conditions, rather

than social or economic conditions. (Pub. Res. Code § 21060.5; CEQA Guidelines § 15360.) The project's potential impacts to cultural resources is extensively detailed in Chapter 4.5 of the DEIR along with proposed mitigation. However, the comment is not specific regarding any undisclosed harm to cultural resources, or precisely how the DEIR's proposed mitigation measures fail to protect cultural resources. The commenter is also referred to Master Response 2 regarding Social and Economic Impacts.

Regarding the general allegation that the Project Description is inaccurate, the commenter is referred to Chapter 3 of the DEIR. There the DEIR provides a comprehensive description of the project in accordance with the CEQA Guidelines. (DEIR p. 3-1.) Other than the general allegation that the Project Description is inaccurate, the commenter does not point to any specific shortcoming of the Project Description, nor any missing information or changes that would make the Project Description more accurate.

For the comment's statement that the County relied on an incomplete baseline or lacks data sufficient to evaluate the project's environmental impacts, the County notes that the DEIR contains a complete description of the physical environment and all conditions in the vicinity of the project. As noted by CEQA Guidelines Section 15125(a), "This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." As the commenter does not cite any specific shortcoming of the DEIR's description of the physical environmental conditions, nor describe how the baseline is "incomplete," the County refers the commenter to the discussion of the baseline in the DEIR. (see DEIR pp. 1-3 through 1-7.)

On a similar note, the comment alleges that the DEIR "lacks data and analyses" needed to make informed determinations, underestimates or omits impacts and fails to provide effective and feasible mitigation measures. However, the commenter only makes this general allegation, and provides no examples or references to what data is lacking, what analyses remains unaddressed, which impacts are underestimated or omitted or what mitigation measure is ineffective. In addition to the commenter's failure to identify any specific problem with the DEIR, the commenter similarly does not posit any changes to mitigation measures nor propose new or additional measures that would remedy a perceived problem. Without specific criticisms of the DEIR that can be addressed or remedied, the County cannot be sure what changes the commenter wishes the DEIR to incorporate or how it fails to meet legal adequacy.

Response to Comment Ind 252-6

Regarding consultation requirements under CEQA and County Resolution No. 20-533, the commenter is referred to Responses to Comments Ind 252-3, Ind 252-4, and Ind 252-5 above.

Individual Letter 253

Dist 3

EACH SUPERVISOR REC'D

March 4, 2022

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoeck, and Hardy Bullock,

Ind 253-1 I am a resident of Grass Valley and would like to join my voice to the chorus of local people who oppose the re-opening of the Idaho-Maryland mine. Allowing a ponderous extraction industry within the city of Grass Valley invites a multitude of risks to the health, stability, and sustainability of our community. The risks to health and environment are numerous and include damage from toxic mining dust, diesel exhaust, and toxic residues such as mercury, cyanide, and lead in our downstream ecosystems.

Ind 253-2 The prospect that more than 80 mitigations in the DEIR can be resolved is naive. Those living close to the mine will be forced to suffer the noise and congestion from 100 trips per day of trucks hauling waste rock and incur well water depletion or perhaps even loss of their wells. At their last meeting the NID board members expressed their concerns of this becoming a bigger problem than the DEIR presents and Rise Gold claims.

Ind 253-3 The risks are also financial. Residents near the mine will likely see a drop in the value of their homes, affecting the area's real estate market. Rise Gold is new to gold mining and therefore has no history of success. Rise Gold's CEO Ben Mossman has filed for bankruptcy in a past mining adventure. Should this happen again here the consequences could be disastrous. Who cleans up the waste left behind? Who pays costly legal fees to secure action? Demand for gold tends to be speculative, and there are indicators that gold may become less attractive to investors (The Economist, January 8, 2022, page 66). This does not bode well for the future of gold mining.

Ind 253-4 Furthermore, the mine will sap our electricity supply by using the equivalent of 12% of county consumption or an estimated 5,000 homes. Can our community afford to dispense such a valuable resource when facing an increasingly precarious energy future for decades hence?

Ind 253-5 And where will the mine's imported workers live? Housing in our community is already severely limited.

Ind 253-6 As you deliberate on whether to approve or deny the Rise Gold mine project, please consider this as not just a Grass Valley matter but as a county matter. Our town is a vital component of the county's financial well-being, one of its major hubs for the arts and culture, and a launch pad for people who come to explore the county's natural beauty. Help keep it so.

The risks are many and the benefits few. I urge you not to approve this dubious, multi-generational 80 year project. Current residents and their descendants will thank you.

Sincerely,

Fred Pohlmann
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Grass Valley, CA 95945
831-338-2488
pohlmannfred10@gmail.com

INDIVIDUAL LETTER 253: FRED POHLMAN

Response to Comment Ind 253-1
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 253-2
The comment expresses a general opinion that the it is naïve to assume all mitigations within the DEIR can be resolved, but does not provide specific examples that would allow for a detailed response. Please see Master Response 1, as well as Master Responses 14 and 15.

Response to Comment Ind 253-3
Please see Master Responses 2 and 3.

Response to Comment Ind 253-4
Please see Master Response 25.

Response to Comment Ind 253-5
Please see Chapter 4.9, Land Use and Population and Housing, of the DEIR regarding impacts related to housing future mine workers. As discussed on page 4.9-25, as of 2018, Nevada County has 53,745 total housing units with a 22.5 percent vacancy rate (12,098 vacant housing units). The unincorporated area of Nevada County has a total of 32,182 housing units with 4,645 vacant housing units (14.4 percent vacancy rate). Therefore, it is reasonably anticipated that the addition of 312 persons as a result of increased employment generated by the proposed project could be accommodated by existing housing stock in Nevada County.

Response to Comment Ind 253-6
The comment is a closing remark and does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 254

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March 30,2022

Matt Kelley, Senior Planner
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RE: Objections to the Draft Environmental Impact Report ("DEIR") SCH #2020070378 for the Idaho-Maryland Mine Project dated December 2021 (the "Project") In Response to the County of Nevada (the "County") Community Development Department's Related Notice dated February 7, 2022 (the "County DEIR Notice").

Dear Matt:

Ind 254-1

I have enclosed my objection to the Draft Environmental Impact Report dated December 2021, in response to your County DEIR Notice. As one of the thousands of local community residents and voters living on Banner Mountain above or around the 2585-acre underground mine at issue, I look forward to meeting with you and your team to address various critical errors, omissions, and deficiencies in the DEIR. As I demonstrate in detail in my Objection, the disputed DEIR generally neglects our local concerns and often incorrectly treats the CEQA mine "project" as if it were just the Brunswick Industrial Site and 30 or so wells along East Bennett Road or (if the DEIR incorrectly permitted to split them) the Centennial Industrial Site. The reality is that many of the most serious mine impacts affect those of us living above and around the 2585-acre underground mine. As the legal and political dispute processes persist until the 24/7/365 mining stops, hopefully long before its disputed 80-year proposed endgame, I suspect that we are among the objectors with the most enduring legal and political resistance to this DEIR and its mining plan. Since approval of the DEIR or the mine will also trigger significant law reform efforts by us affected locals, I would like to discuss such law reform efforts with you in order best to determine where we might find some common ground in our efforts to better regulate any such mine and reduce the problems stated in my and other objections.

Ind 254-1

The thousands of us such local residents and objectors above and around the 2585-acre underground mine who are at risk of such serious burdens, problems, and harms, often undisclosed or insufficiently addressed in the DEIR, dwarf those imagined new jobs for workers from who knows where. Also, the DEIR mine caused real estate value decreases would cost our area many good constructions jobs. My extensive, attached analysis demonstrates why locals like me decline to suffer this mine underneath us. It is not practical to even list those objections here, much less explain them, but my attached Objection often uses the words of the DEIR itself, as well as other proof, to expose many errors, omissions, and deficiencies. These concerns are about more than only the traditional CEQA environmental issues, such as regarding depletion of our groundwater by the mine dewatering and other traditional issues addressed by me and many other objectors. I also urge your attention to those additional problems in which I have some special expertise, such as my experienced opinions from 50 years of legal practice dealing with hundreds of failing, bankrupt, or abandoned mines and their failed or their overwhelmed insurance or surety companies. That experience suggests to me that you should study closely not just the disputed DEIR, but also the current SEC Forms 10K and 10Q on the Rise Gold Corp. website, since assurances in the DEIR about compliance, safety, and mitigation are meaningless if the miner lacks the working capital and resources to perform them timely. Saying something in a DEIR does not make it so, or feasible, or credible. If Rise cannot afford to accomplish even the insufficient DEIR safety, mitigation, and other work described in the DEIR, then the whole DEIR project is not feasible and cannot be feasible, credible, or approved.

Also, while financial consequences may be considered an indirect impact by the DEIR proponents, who ignore, understate, or otherwise fail satisfactorily to address such matters in the DEIR, opponents like me have reasonable cause for concern about such mine operations trashing our real estate values above and around the mine. These facts creating such a real estate value depression are not often revealed in the DEIR as required and are never adequately explained, even in the more obscure and surprising places where I found clues mentioned in the DEIR. Consider under these circumstances what a home seller living above or around the 2585-acre mine could say to a buyer about these issues, since we all regard the disputed DEIR as containing material errors, omissions, and deficiencies, and we still have no sufficient understanding of the unhappy realities we expect to be created underneath us if the DEIR mine were approved. In any event, such negative financial consequences explain another of many reasons why us locals' resistance will be so resolute and persistent.

The only practical solution for us locals to avoid the burdens, risks, and harms from this no net benefit DEIR mine is to defeat the DEIR and to stop the mine from reopening. If that sounds like hyperbole, like our disputes over the mine's depletion of our surface owner shared groundwater harming our already, climate change-stressed forest and plants above and around the 2585-acre underground mine, try this more scandalous example. As I demonstrate in the Objection from the DEIR's own words, this 2585-acre underground mine plans to shore up its 24/7/365 digging, tunneling, blasting, dewatering, and other mining activities for 80 years with toxic HEXAVALENT CHROMIUM (CR+6) in its cement paste. Except (perhaps) the DEIR proponents, who rarely mention the Cr+6 and never acknowledge any toxic controversy in the DEIR, everyone likely knows how a certain utility paid a giant settlement after hexavalent water pollution turned Hinkley, CA, into a ghost town with huge cemeteries from alleged CR+6

pollution of the groundwater, as illustrated in the famous reality-based, semi-horror movie *Erin Brockovich*. Whatever you may think about the science at issue with Cr+6, that danger is going depress our real estate values and scare away people who reasonably fear this mine will turn our community into another Hinkley. Most residents (like me) will be more trusting of scores of relevant EPA reports, studies, and data on its toxic substances' website, as well as the European Union's announced ban on hexavalent chromium, than on anything this DEIR now has to say about this previously unanalyzed risk.

Why has the disputed DEIR failed to warn us even about the existence of such risk and controversy, much less evaluate the science damning Cr+6? Even if that risk were somehow contained, which would first require that risk to be revealed and fairly addressed in DEIR, imagine trying to explain this risk to a prospective home buyer (or, if you're a brave buyer, your lender, or its appraiser), when your house is above or around the 2585-acre underground mine held together by hexavalent chromium cement added daily 24/7/365 for 80 years. Note, this dangerous CR+6 is not yet in the mine as far as we know, so this miner will be fully accountable for its addition to the mine. But any governmental authority approving this DEIR or mine will also be responsible since my Objection and others now give fair warnings.

Since I and others demonstrate in objections why we believe there is no net benefit to the mine, especially in our suburban (not rural, as the DEIR claims) community, the decision to reject the DEIR and mine should be easy. As you compare the disputed DEIR and my Objection rebuttals, please consider at least three other common deficiencies, errors, and omissions that my Objection demonstrates in this fatally flawed or worse DEIR and its mine pitch:

Ind 254-1

First, whenever the DEIR addresses a controversial issue (eg, like its incorrect and unsubstantiated assumptions about our future groundwater recharge rate), the DEIR incorrectly assumes that one can judge the next 80 years [although the DEIR stops its occasional attempts at analysis by 2040] of 24/7/365 mining based on the nonpredictive past, ignoring the "new normal" of climate change causing unprecedented, chronic dryness, drought, and other environmental problems. (eg, The DEIR projects groundwater recharge based on the average annual rain between 1967 and 2017, which is not predictive of our future groundwater recharge at issue, especially since the dewatering from our **shared local** groundwater is being disposed of downriver somewhere else in the Wolf Creek).

Second, the disputed DEIR claims that any analysis of its mining beyond the next 20 years [or sometimes 15 years or cutting off at 2040, depending on the topic] is "speculation," so that the DEIR incorrectly claims that CEQA allows it to avoid discussion of any burdens, risks, or problems in the last 60 years of its mining (or after 2040) until it closes the mine. How can any responsible government blindly permit that kind of "leap of faith" for an undesirable mine without any net benefit to the community managed in this kind of situation with such admitted financial challenges by its operator, especially as every quality scientist assures us that the next 80 years will become progressively worse and drier for our climate, our weather, and our quality of life? Who, besides this disputed DEIR's advocates, will dare put our community at such unknown risk for the last 60 years [or after 2040] based on the incorrect and unsubstantiated DEIR assumption that such 60 years (or after 2040) must be the same as the next 20 years (or until 2040), which period data, in turn, is based on the climate change denying assumption that that next 20 years (or until 2040) will match the average rain between 1967 and 2017?

Ind 254-1

Third, even apart from demanding disputed DEIR approval without sufficient, reliable data, time and again my Objection reveals that the disputed DEIR incorrectly assumes, without sufficient proof or even realistic logic, that the past is predictive of our "new normal" future. It is not just the DEIR's rebutted claim that the last 60-years after the next 20-years (of 80-years) must be the same as those first 20-years, but the disputed DEIR also contends that nothing will have changed between either (i) the closing and flooding of the mine in 1956 and now, or (ii) now and what happens underground as they mine in new and expanded places and deeper without knowing what conditions and substances they will encounter or what problems they will unleash on our community. Maybe the arsenic, asbestos, and other hazardous chemicals that were insufficiently addressed in the DEIR will get even worse in the new, expanded, and deeper mining, or maybe they'll encounter and unearth new and worse threats. The point is that the DEIR allocates that risk of the unknown in such 24/7/365 mining for 80-years on us neighbors above and around this undesirable, no net benefit, 2585-acre underground mine. Those kinds of risk belong instead solely on the foreign controlled mine owner, whose profits will not stay in our community, and whose CEQA obligation is to address those and other errors, omission, and problems identified in my and other objections.

Because the March 24, 2022, hearing incorrectly excluded evidence that the DEIR and its miner is not economically feasible, I will also be submitting a CEQA brief to support my request for your reconsideration of that exclusion. Apart from the merits there are several additional considerations requiring such rebuttal evidence. First, the DEIR itself (at 6-14) admits that the mine is not likely feasible economically if its operation is limited to a 12-hour day, thus entitling us to explain from the SEC Form 10K and 10Q filings on the Rise Gold Corp website why that is an even bigger feasibility problem that the DEIR reveals. Second, the DEIR (at 4.3-103—104) adds a disputed, deficient, and incorrect "Non-CEQA Related Analysis" to which we must be able to object with our own rebuttal data that some incorrectly may consider outside CEQA boundaries. Third, I present legal authority that require good faith truth and reality in a DEIR that lacks them in certain cases addressed in my Objection for reasons that some seem to consider beyond the CEQA boundaries. Since many such rebuttals in my Objection expose the problems using the DEIR's own often inconsistent or contrary words or those in Rise's current SEC filings, that should be permitted legal impeachment to avoid allowing such incorrect data into the record.

While there is much more of concern to discuss, I urge you to read them in my Objection and others that I incorporate. Thank you for considering my views.

Sincerely,

// Larry Engel

G. Larry Engel

G. Larry Engel
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March 30, 2022

Ind 254-2

Objections to the Draft Environmental Impact Report ("DEIR") [SCH #20200070378] for the Idaho-Maryland Mine Project dated December 2021 (the "Project") In Response to the County of Nevada (the "County") Community Development Department's Related Notice dated February 7, 2022 (the "County DEIR Notice")

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    A. **I Am A Neighbor Personally Impacted By the 2585-Acre Underground Mine, As Well As A Voting Member of The Local Community That Will Suffer Mine Burdens, Risks, And Problems Either Ignored Or Deficiently Addressed In the DEIR.**

I, G. Larry Engel, reside in my retirement house near and uphill from Idaho Maryland Road and Wolf Creek in a significantly populated, normal suburban environment. My Banner Mountain community is not the "rural" area that the disputed DEIR implies is expendable to its objectionable mining goals. My "Section 20" three-acre property could be on the surface above the **2585-acre underground mine** at issue in the core of this dispute but neglected in the DEIR analysis. However, I think that I am just nearby the mysterious surface boundary of that underground mine, although I will be in the **"impact zone"** for the depletion of my groundwater and other environmental harms, as well as in the **"stigma zone"** where proximity is sufficient to depress the value of my property and thousands like me in such relevant CEQA impact and stigma zones ignored in the disputed DEIR. We cannot be dismissed or mistreated, as the DEIR does, as if we were just a small "rural" group in the small area addressed by the DEIR around the Brunswick and Centennial sites or the 30 well owners along East Bennett Road. **The DEIR maps and the Rise public filings I've seen carefully obscure surface identifiable locations above and around that mine, and, as far as I can determine, Rise has failed to notify any of us property owners or users above or around those underground 2585-acres to be blasted, dewatered, and mined 24/7/365 for 80-years in accordance with a disputed and incorrect DEIR.**

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As I demonstrate in this Objection, those of us in the impact and stigma zones are exposed to many negative mining impacts, risks, and burdens, especially as to our shared groundwater that the mining would pump away downriver somewhere else by the disputed DEIR dewatering plans. Neither I nor any of my thousands of neighbors should have to guess about the surface vs underground boundaries for the many conflicts and competitions to come if the DEIR and mine are mistakenly approved. (The best and still imprecise data readily available to me that I used in this Objection [see my # 2 below] comes from the Rise Gold Corp. current SEC Form 10K from its website, which interestingly provides better information than the DEIR on various mine and related issues; not because the 10K was required to do so, but rather because the related DEIR data was so insufficient.) Such omissions and lack of notice to surface residents are assumed by us to be a tactic to avoid provoking us until after the DEIR had some momentum to weather the coming storms, as such surface users realize the threats to themselves, their properties and trees (eg, besides environmental harms, especially to our groundwater, also the mine stigma that will harm our real estate values), and their community way of life for such a no net benefit mine. See, eg, my # 4. The decisionmakers considering this DEIR should not tolerate, much less reward, such tactics.

The disputed DEIR contains grossly deficient discussion of the many burdens, risks, and harms that would be suffered by thousands of us above or around that 2585-acre

underground mine. My adverse risks and affects from the mine, particularly but not exclusively from the 2585-acre underground mine, would include many things addressed in my Objection that are ignored, understated, or inadequately addressed in the DEIR. Without limiting what is a long list of potential grievances, those include (i) depression of my real estate values for 80 years plus, (ii) depletion of my groundwater by dewatering that the mine sends it off downriver somewhere else with the unsubstantiated and false assurance by the DEIR that somehow, despite climate change future dryness and drought, the ground will somehow recharge, because that is what used to happen with average rainfall between 1967 and 2017, threatening the long term survival of my many (48 plus) tall trees and other plants, (iii) the threat of toxic hexavalent chromium in cement paste used to shore up that 2585-acre underground mine below or near me, and (iv) the risks of subsidence from loss of lateral or subjacent support, nuisance level noise and vibration from blasting and mining beneath or nearly beneath my property (not farther away, where the irrelevant DEIR monitor devices are located around the Brunswick and Centennial surface sites), traffic burdens from 50 to 100 trucks a day on the same key local roads 24/7/365 for 80 years, and many other problems addressed below.

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I keep stating the "2585-acre" reference to that underground mine, because a casual reader would imagine from the DEIR that the only thing that mattered was the Brunswick site, a few adjacent East Bennett Road properties with 30 or 31 wells, and (although the DEIR incorrectly tries to cast it as a separate CEQA "project") the Centennial site. If the DEIR is approved, the key battles that will endure against the whole CEQA "project," as long as the mine is a threat as described in this Objection, will include the defense and competition from thousands of residents and voters living on or around the surface of the 2585-acre underground mine, many times more than the mine workers imagined coming from who knows where. See my # 14. I note that this is not just about enforcement of our competing legal rights to defeat the DEIR and stop the mine. If we suffer the loss of the water that we need from NID, we locals will exercise our rights to sink our own wells to compete for our groundwater to supply ourselves and save our forest trees and plants. (If NID does not like that idea of its customers taking whatever allowance NID provides in the coming drought cutbacks, while drilling thousands of defensive wells that interfere with the mine's dewatering, they should reassess the politics of thousands of local voters exercising their rights to elect correct thinking officials and use initiatives to clarify our competing rights.) See my # 3.F. The point is that when people discover these realities and organize to defend their homes, their community quality of life, and their peace of mind against an undesirable mine adding no net value to our community, us local defenders must prevail. No one will sacrifice their rights, property, or quality of life for such a mine however long it takes for justice to be done in the various legally and politically proper counters.

FOR THE RECORD, NOTHING IN THIS OBJECTION SHOULD BE INTERPRETED AS A THREAT THAT I OR ANYONE ELSE WILL SUE RISE OR ANYONE ELSE, SINCE IT IS PREMATURE TO MAKE THAT KIND OF COMPLEX DECISION, AND ANY SUCH PREMATURE LEGAL ACTION WOULD NOT BE "RIPE" YET AS A JUSTICIABLE CAUSE OF ACTION. A DISCUSSION REACTING TO SOMEONE'S THREATENED FUTURE CONDUCT BY IDENTIFYING OBJECTIONS AVAILABLE FUTURE REACTION OPTIONS IS NOT A THREAT TO EXERCISE THOSE OPTIONS. FOR EXAMPLE, THIS IS ONLY A DRAFT ENVIRONMENTAL IMPACT REPORT THAT MUST GO THROUGH A

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COMPLEX PROCESS BEFORE THE MINING STARTS, AND MANY IMPROVEMENTS AND REFORMS ARE POSSIBLE THAT MAY REDUCE THE NEED FOR SUCH LOCAL SELF-DEFENSE FROM SUCH FORESEEABLE DEIR/MINING BURDENS, RISKS, AND HARMS. THE REASONS FOR THIS OBJECTION COUNTER DISCUSSIONS OF POSSIBLE REACTIONS AND DISPUTE REMEDIES INCLUDE TO EXPLAIN WHY, IF IT PROCEEDS, THE DEIR NEEDS TO BE REDONE TO CORRECT ERRORS, OMISSIONS, AND OTHER DEFICIENCIES. The reasons for the urgent or strong commentary about local reactions now is that history of such conflicts shows what could follow involving legal, political, and competitive self-defense possibilities that have commonly occurred in similar such situations, which discussions reflects a desire to assure that the DEIR advocates and decisionmakers: (i) take our local concerns seriously, (ii) improve the next version of the DEIR, if any, and (iii) address more comprehensively and appropriately the local issues and concerns in this and other objections, including all those appropriate concerns voiced at the March 24, 2022, County hearing. What we want is peace and the status quo.

What this Objection also does, as lawyers do, is to correct the DEIR on some of its many disputed express and implied legal assertions and illustrate the need for technical reforms in the DEIR and mining by reporting about the litigation, political, and competitive options from examples of other such unrelated mining and environmental approval disputes with some similar circumstances. See my #'s 4 and 14. In other words, the goal of this Objection is to reduce in advance the issues in dispute here for our common good, rather than just to combat problems in appropriate ways after the mining begins and the burdens, risks, and harms become actual instead of theoretical and require appropriate counters.

Besides us defending ourselves, our property, and our local environment, we are also defending our larger community. Even for those distant from many, direct mine impacts, the community suffers a harmful "opportunity cost" from allowing this mine for no net benefit, as explained in my #4. It is part of the CEQA noncompliance that is most frustrating in the DEIR errors, omissions, and deficiencies, where the DEIR is supposed to address the cumulative effect of the whole mine "project," including the 2585-acre underground mine, on key issues. There is a margin for what our community environment can safely tolerate as environmental impacts. This no net benefit mine (see my #4) exhausts that margin more and faster than the DEIR reveals or admits, leaving less margin for what else could be tolerated by competing uses by us residents and by desirable businesses that benefit our community. Each of the cumulative impacts of the whole mine deplete our safety margin of what can be tolerated, and, if government decisionmakers now give away to this DEIR mine for 24/7/365 operations for 80 years (of which only the first 20 [or up to 2040] is even attempted to be analyzed by the DEIR), then the inevitable result would be political and legal reforms (see my #3.N) and legal enforcements of our surface rights that eventually stop the mine, whether by appropriate counters or by allowing our competing uses and law reforms against the disputed DEIR mining plan. As explained below, if the mine is not stopped, more undesirable and exploitive opportunities will follow, as happened in the Bay Area with Richmond after Chevron and Benicia after Valero.

What happens then? If government insisted that the DEIR be made more realistic, correct, compliant, and useful, the DEIR itself would prove the obvious: if this disputed DEIR mine (which must include the 2585-acre underground mine the DEIR often ignores) is allowed

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to start, when the aroused local political and legal actions stop it, everyone and our environment will wish that mining had never started. There is an old fable about "Pandora's box" that applies to reopening this mine here, and we urge you decisionmakers not to start down a path that has only a "dead end" and undeserved misery and division for our community.

For example, I focus below (eg, my #3.E) on one illustration of that general failing of the DEIR, such as the fact that the disputed DEIR groundwater depletion analysis mistakenly only focuses on 30 or so competing wells on East Bennett Drive, when the obvious and bigger threats are to the hundreds of wells that compete underground for the same water in the area above or around the 2585-acre underground mine being dewatered 24/7/365 to dispose of that precious water for 80-years somewhere else downriver. See my #'s 3.E and N. More importantly for this example of the many opportunity costs discussions throughout this Objection, **all of us thousands who do not currently have wells and who are ignored by the DEIR but living on the surface above or around the 2585-acre underground mine also have competing groundwater rights. We would also begin to drill wells and compete for that same groundwater that when NID is unable to satisfy our needs (whether from climate change chronic drought shortages or governmental reallocation of our water elsewhere). The opportunity cost is that the mine may (incorrectly) claim that it was depleting our shared water supply first, so that we cannot exercise our groundwater rights, leaving us harmed and our already drought and climate changed forests and plants short of the water they need. Obviously, that kind of miner argument is not only legally incorrect, flawed, and worse, but it ignores the political reality that all of us suffering voters would tolerate such abuse where a no net benefit mine denies us (ie, the "opportunity cost") the right to save ourselves and our environment for the profit of generally foreign shareholders. Stated another way, the future will be hundreds of new wells from the surface above and around the 2585-acre underground mine competing for their own groundwater, just like people all over the central valley and elsewhere have already been doing when the surface supply is insufficient. Therefore, besides the inevitable legal and political turmoil from such disputes, the conflict for governmental decisionmakers is: what are the real environmental consequences of those wells and others defeating the disputed groundwater assumptions and erroneous mine claims in the DEIR? Note that at least us locals will use the local water locally, rather than dumping it into the Wolf Creek for some other destination. See my #'s 4, 5, and 3.N.**

As you read through this Objection, please note that the DEIR insists that every inconvenient truth the DEIR chooses to ignore, understate, or otherwise deficiently address is called or treated as "speculative," such as, for example, (i) climate change effects like chronic dryness and drought, and (ii) everything that happens after 2040 or in the last 60-years of its 80-years of 24/7/365 blasting, mining, dewatering and disposition of our precious groundwater downriver somewhere, and other abuses of our environment. See my # 3.A, B, D, F, and M and 5. Instead, the DEIR relies exclusively on the past data and assumes (without proof and contrary to climate science) that the future must be the same as that nonpredictive past, such as, for example, that the rainfall it assumes will be recharging our groundwater for 80-years, despite the massive mine dewatering depletion of our local groundwater, will continue to be what it was in the past between 1967 and 2017 (see my #3.M rebuttal). Reality, as accepted by most responsible scientists, governments, and businesses, is that climate change will impact us to

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create a "new normal," where the easier DEIR past does not predict the more dangerous future. So, how is it that, while every responsible scientist, business, and government official is planning based on climate change, the DEIR ignores such "inconvenient truths" as "speculative?"

Most businesses I know would be afraid not to correctly address such climate change and related realities, because they would be afraid that their projections would make their securities and other public filings false and misleading and inspire litigation. Note that the SEC has just proposed mandatory climate change disclosure rules on March 21, 2022, to supersede existing voluntary rules. 17 CFR 210,229,232, and 249, RIN 3235-AM87. Soon, we will be all be reading (as I already do here in my # 2) SEC filings to catch what is missing in environmental impact statements and other disclosures, since most reporting companies like this are more afraid of errors, omissions, and noncompliance in SEC filings than in environmental filings like this DEIR. Do government decisionmakers here wish to go on the record approving this disputed and defective DEIR, and thereby denying climate change and continuing drought, in effect joining the DEIR in the illusion that the next 80-years of rainfall here will be the same as the average between 1967 and 2017? See my # 3.M. For current climate change data ignored by the DEIR, see, eg, "Climate Change 2022: Impacts, Adaption And Vulnerability. "Working Group II Contributing to the IPCC Sixth Assessment Report and scores of current studies and reports cited therein, as briefly summarized in "Climate Risk Disclosure Becoming the New Standard For Business," Forbes 3/22/22.

B. My Credentials And Experience Qualify Me As An Authority On Some of These Issues As A Result of 50 Years of National And Cross-Border Bankruptcy And Insurance Insolvency Work Involving Hundreds of Bankrupt, Failing, Or Abandoned Mines And Their Failed Or Liquidated Insurers.

I am a California licensed, bankruptcy lawyer who, until I retired here in 2015, practiced the following relevant specialties, working nationally as a leading partner of a leading national and international law firm working nationally out of the San Francisco office: big case US business bankruptcy and cross-border insolvency cases, as well as insurance insolvency resolutions. Those specialties often combined to give me substantial experience and expertise in dealing with hundreds of mines that failed, filed bankruptcy and/or cross-border insolvency cases. (For example, there is a common mining industry situation for disappointing local victims and communities when a foreign based mining company files a foreign insolvency proceeding and a related US Chapter 15 and/or 11 case.) In some situations, the mines were otherwise abandoned and liquidated (as, for example, when the owner flees to a foreign venue, files a US Chapter 7 for the "shell" US operating company miner, and the appointed Chapter 7 trustee abandons the mine, leaving it to the EPA and other governmental authorities to clean up the worthless mess). In certain situations, my mining experiences involved my insurance insolvency expertise, as, for example, when I worked for years as lead counsel liquidating (during the savings and loan crisis era) the major California insurer which had issued the surety bonds for much of the mining industry risks and closing reclamations. In the mid-1990's I also represented major business creditors of mining and other environmentally dangerous insured policyholders in the asbestos and environmental crisis restructuring of Lloyds of London (Equitas). Such work

and other experiences resulted in my selection to the global bankruptcy "clubs" of leading players, the American College of Bankruptcy and its international counterpart, the International Insolvency Institute, as well as the American College of Commercial Finance Lawyers (as to my distressed company financing expertise). In those group interactions I often learned the unwritten stories and lessons from and about many relevant cases from the best players working them and judges resolving them. Such things led to my serving for a time as the Chair of the American Bar Association/Business Law Section Task Force on Insurance Insolvency, where we developed a new generation of insurance insolvency model laws to improve creditor and policyholder recoveries, again enabling me to learn more "behind the scenes" about failing mines and their owners.

I have applied that experience here. I have read the DEIR, and I am familiar with the entire mine area, including the 2585-acre underground mine about which the disputed DEIR shares too little risk data and planning. This Objection reflects my opinions based on my such experiences and qualifications, which include having read hundreds of such unrealistic or optimistic plans and reports for mines that failed when their reality was exposed. There are many serious errors, omissions, and deficiencies in this disputed DEIR, as my Objection and others demonstrate. The DEIR is about some "alternative reality," while the hundreds of local objections, such as those voiced at the March 24, 2022, County hearing reflect the applicable realities.

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While I am not a scientist, I know from such long experience that a mine like this does not belong here. That would be true even if this were what the DEIR incorrectly calls a rural or semi-rural area, but certainly not where I and thousands of others live above or around the 2585-acre mine, which is actually a normal, quality suburban community. For example, opposition here will increase as people begin to understand the DEIR's plan, for example, using hexavalent chromium cement paste to shore up the new mining, and depleting our groundwater 24/7/365 for 80-years during what climate change is causing to be a "new normal" of perpetual dryness and drought. The confusion created by this objectionable DEIR relates in significant part to the fact that the core of this CEQA "project" is the 2585-acre underground mine largely ignored by the DEIR, not just the small Brunswick Industrial Site or its East Bennett Drive site for 30 or so replaced wells (or the Centennial site the DEIR incorrectly claims as a separate "project.") Because residents like me will be battling to save our homes, environment, and quality of life above and around that 2585-acre underground mine, which is never adequately analyzed by the DEIR, we locals are an unaddressed problem for the mine advocates that cannot be evaded. The stresses of the coming continuous conflicts, disputes, and competition must be addressed now by government DEIR decisionmakers, because the problems cannot be solved by the unaffordable (see my # 2), nonresponsive, and inadequate mitigations proposed in the DEIR. Because the DEIR refuses to recognize such real problems as CEQA requires (see my # 14), the DEIR cannot hope to mitigate them as the law requires.

What is predictable from my experience is that, when properly informed, **the thousands of local community residents and voters living like me above or around the 2585-acre underground mine at issue, will resist this mining until it stops, exercising our many appropriate legal and political remedies and means of competition. See my #'s 3.N and 4. Why so organize and resist? Because even if the DEIR were correct, compliant, and sufficient**

(which it is not) and even if the miner were capable of timely and safely accomplishing the DEIR goals (which I doubt, see my # 2), the mine still adds no net value to our community (see my # 4), creates burdens, risks, problems, and stigmas that disrupt our lives, harm our property and environment, depress our real estate values, and add other burdens, risks, and problems ignored by the DEIR that perpetually would disrupt the quality of our lives. That conflict by thousands of us locals protecting our homes, environment, and the quality of our lives and community cannot be mitigated by this disputed DEIR. Since we have surface property competition, legal, and political rights to resist that cannot be impaired by an approval of the DEIR or the mine, this mining will be stopped sooner or later. What my such experience with other mines has shown is that the longer it takes to stop a mine, the worse the impacts will be on all concerned when it finally stops. One of many key missing and deficiently analyzed factors in the DEIR is: what happens when the DEIR insistence on 24/7/365 mining for 80 years is overcome? See the DEIR admission at 6-14 that a normal 12-hour day makes the project unfeasible and my counters in my # 13 and elsewhere.

Also, while it may be considered an indirect impact by the DEIR proponents who ignore, understate, or otherwise fail satisfactorily to address such matters, opponents like me have reasonable cause for special concern about such mine operations trashing our real estate values above and around the mine. These facts creating such real estate value depression are not often revealed in the DEIR as required (see my #'s 4 and 14) and are never adequately explained, even in the more obscure places where I found some admitted in the DEIR (see 4.3-103--104.) However, the existence of lethal threats and risks (eg, hexavalent chromium discussed in my #'s 3.C, 3.G and H, and 7) also explains why our locals' resistance can be expected to be so resolute and persistent. The good news here for local resistance is that in my experience such mining interests like Rise in these circumstances simply do not have the capacity in a long term political, law reform, and legal competition to prevail over the impacted locals, once they are informed, aroused, and organized. See my # 3.M.

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Successful resistance in other past situations (unrelated to Rise or this mine) generally followed a predictable pattern, where the local victims begin insisting on fixing the errors, omissions, and deficiencies in the disputed draft environmental impact reports in a continuing process of challenges, which at each stage cause reforms making the mining process less risky, harmful, and problematic, often with the side effect that such mine operating plans become slower and more expensive for good causes. If those reforms are not sufficient and such mine continues, then local political and law reform efforts often accelerate to enact new self-defense laws and regulations and to elect stricter official enforcers committed to protecting the community from the threatened mine risks, burdens, and noncompliance. See my # 3.N. Those efforts are often accompanied as well as by such local victims' other legal challenges, such as both the usual nuisance, inverse condemnation, and other tort and equity claims, as well as (where the circumstances are feasible) a traditional set of surface owner nuisance, trespass, and quiet title claims (eg, groundwater rights battles), claims to prevent subsidence by loss of subjacent and lateral support, and various declaratory relief and equitable claims by impacted surface owners working to confirm their competing legal and equitable rights against excessive underground mining burdens, risks, and harms (eg, the right to drill more wells for using the surface owners' own groundwater being wasted and removed by such underground mining) and requiring more sufficient mitigation by the miner. Usually, if not before then, by that stage

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of such other historical battles and competition often either the miner attempts some bankruptcy (eg, in bigger and well-funded conflicts often involving cross-border bankruptcies to help mine insiders shield their exported profits) and other related maneuvers to escape justice, or else they sooner or later abandon the mine, either (i) if they cannot find a buyer, even using the special sale free and clear of liens, claims and, encumbrances provisions in 11 USC #365(f) or in Bankruptcy Code Chapter 15 accommodating foreign insolvency law maneuvers, or (ii) if the locals use their creditor counter rights effectively (in coordination with community oriented governmental officials) to block such sales to keep dangerous history from repeating itself. See my #'s 3.N, 8, 14, and 15 below.

Mine advocates may attempt to argue that such comparisons sound aggressive or hyperbolic, such as our dispute with the DEIR regarding our fear of the mine's groundwater depletion (without sufficient local recharge or balancing) harming our already climate change stressed forest and plants above and around the 2585-acre underground mine (see my #'s 3.D, 3.F, and 5). Where this disputed DEIR and mine will likely confront an early challenge in my experience is from the more lethal, scandalous stigma example from hexavalent chromium (remember the movie, *Erin Brockovich*?) that would certainly also trash our local real estate values and community reputation, even scaring away tourists. See, eg, my #'s 3.C, 3.G and H, 7, and 8. As I demonstrate below from the DEIR's own words (although in obscure places where they would be less likely noticed), this 2585-acre underground mine plans to shore up its 24/7/365 digging, dewatering, and blasting areas for 80 years with toxic HEXAVALENT CHROMIUM (CR+6) in its cement paste. Since everyone (apparently except the DEIR proponents) likely knows how a certain utility paid a giant litigation settlement to turn its alleged victims, turning Hinkley, CA, into a ghost town with huge cemeteries from CR+6 poisoning of its groundwater from settling ponds, as illustrated in the famous reality-based movie *Erin Brockovich.* Whatever you may think about the science at issue here, that Cr+6 danger is going scare away people who reasonably fear this mine will turn our community into another Hinkley.

Why? Many will be more trusting of scores of scary mass of EPA data on its toxic substances' website, plus the European Union announced ban on hexavalent chromium, than on anything this miner or its public relations/lobbyists can possibly say in the disputed DEIR, promotional materials, or other excuses. Even if that toxic risk were somehow purportedly contained, which would first require that risk to be revealed and fairly addressed in a CEQA compliant DEIR (since this risk is not presently disclosed), imagine being a home seller trying to explain this to a prospective buyer (or, if you're a brave buyer, explaining to your lender, or its appraiser) when your house is above or around the 2585-acre underground mine supposedly held up by Cr+6. Note, this dangerous CR+6 is not yet in the mine, as far as we know, so this miner will be fully accountable for its addition to the mine. But any governmental authority approving this DEIR or mine would also be responsible as the whole (now alerted) community watches, and, since I and others prove there is no net benefit to the mine (see my # 4), especially in our community. The decision to reject the DEIR and mine should be easy.

C. My Credentials And Experience Qualify Me To Contest Some of the Issues As A Result of 50 Years of National And Cross-Border Bankruptcy Experience And Insurance Insolvency That Includes Dealing with Hundreds of Bankrupt, Failing, Or Abandoned Mines And Their Failed Or Liquidated Insurers.

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I am a California licensed, bankruptcy lawyer who, until I retired here in 2015 practiced the following relevant specialties working nationally out of the San Francisco office as a partner of a leading national and international law firm: big case business bankruptcy, cross-border insolvency cases, and insurance insolvency. Those specialties often combined to give me substantial experience and expertise in dealing with hundreds of mines that failed, filed bankruptcy and/or cross-border insolvency cases (for example, when a foreign based mining company files a foreign insolvency proceeds and a related US Chapter 15 and/or 11 case), or were otherwise abandoned and liquidated (as, for example, when the owner flees to a foreign venue, files a US Chapter 7 for the "shell" US operating company miner, and the appointed Chapter 7 trustee abandons the mine, leaving it to the EPA and other governmental authorities to clean up the worthless mess). In certain situations, this connects with my insurance insolvency expertise, for example, when I worked for years as lead counsel liquidating (during the savings and loan crisis era) the major AAA rated California insurer who issued the surety bonds for much of the mining industry. During that same era of financial stress for many even imagined to be dominant insurers, for example, I also represented major non-mining business creditors of mining and other environmentally dangerous insureds in the restructuring of Lloyds of London (Equitas). Such work and experiences resulted in my selection to the global bankruptcy "clubs" of leading players, the American College of Bankruptcy and its international counterpart, the International Insolvency Institute, as well as the American College of Commercial Finance Lawyers (as to my distressed company financing expertise), where I often learned the unwritten stories and lessons from and about many relevant cases from the best players working them. Such things led to my serving for a time as the Chair of the American Bar Association/Business Law Section's Task Force on Insurance Insolvency, where we developed a new generation of insurance insolvency model laws to improve creditor and policyholder recoveries.

I have read the whole DEIR, and I am familiar with the entire relevant area. This Objection reflects my opinions based on my such experiences, which include reading many such unrealistic or optimistic reports on failed mines that departed from reality. There are many serious errors, omissions, and deficiencies in this DEIR, as my Objection and others demonstrate. While I am not a scientist I know from such long experience that a mine like this does not belong in even in what the DEIR incorrect calls a rural or semi-rural area, but certainly not where I live above or around the 2585-acre mine, which is actually a normal, quality suburban community, especially using hexavalent chromium and depleting our groundwater in what climate change is causing to be a "new normal" of perpetual dryness and drought. **The confusion created by this objectionable DEIR relates in significant part to the fact that the core of this CEQA "project" is the 2585-acre underground mine largely ignored by the DEIR, not just the small Brunswick Industrial Site or its East Bennett Drive site for 30 or so replaced wells (or the Centennial site the DEIR incorrectly treats as a separate CEQA "project".)** Because we will be battling to save our homes and quality of life above and around that

underground mine, which is never adequately analyzed by the DEIR, we are a problem for the DEIR mine that cannot be evaded. The stresses of the coming continuous conflicts, disputes, and competition must be addressed by government decisionmakers, because they cannot be solved by the paltry and inadequate mitigations in the disputed DEIR. Because the DEIR refuses to recognize such problems, it cannot hope to mitigate them as the law requires.

What is predictable from my experience is that, when properly informed, the thousands of local community residents and voters living like me above and around the 2585-acre underground mine at issue, will resist this mining until it stops, exercising appropriate legal and political remedies. Why? Because even if the disputed DEIR were correct and sufficient (which it is not) and the miner were capable of timely and safely accomplishing the DEIR goals (which I doubt as explained in my # 2), the mine still adds no net value to our community (see my # 4), creates stigmas that depress our real estate values, and adds burdens, risks, and problems that perpetually would disrupt the quality of our lives until we organize and stop it. That conflict by thousands of us locals protecting our homes and environment and the quality of our lives cannot be mitigated or, since we have legal and political rights that cannot be impaired by an approval of the DEIR or the mine, this mining will stop sooner or later. What my such experience with other mines has shown is that the longer it takes to stop a mine, the worse the impacts on all concerned when it is finally stopped. Therefore, a key missing and deficiently analyzed factor for more discussion in the DEIR is: what happens when the insistence on 24/7/365 mining for 80 years is overcome? See, eg, the DEIR's own admissions at 6-14 and 4.3-103—104 and my responses below.

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Also, while it may be considered an "indirect" impact by the DEIR proponents who ignore, understate, or otherwise fail satisfactorily to address such matters, opponents like me have reasonable cause for concern about such mine operations trashing our real estate values above and around the mine. These facts creating such real estate value depression are not often revealed in DEIR analysis as required and are never adequately explained in the more obscure places where I found some mentioned in the DEIR. However, their existence explains why our locals' resistance can be expected to be so resolute and persistent, since the only solution for us is to defeat the DEIR and stop the mine reopening. In my experience where the mining interests simply do not have the capacity to overwhelm their aroused local victims, the resisted mine is first slowed and its operations made more expensive for good causes and legal compliance that should have been addressed earlier by an adequate DEIR and sufficient mitigation. At that stage of the battles either the miner usually attempts some bankruptcy related maneuvers to escape justice, or else they abandon the mine, either (i) if they cannot find a buyer, even using the special sale free and clear of liens, claims and, encumbrances provisions in 11 USC #365(f) or in Bankruptcy Code Chapter 15 accommodating foreign insolvency law maneuvers, or (ii) if the locals use their creditor defensive rights (in coordination with community oriented governmental officials) to block the sale. See my discussion of industry tactics below.

D. What Is the CEQA "Project" At Issue, Since The DEIR Largely Ignores Most Impacts From The 2585-Acre Underground Mine That Will Rally Some of the Largest And Most Intense Local Opposition?

It should be revealing to governmental decisionmakers that the DEIR generally ignores and neglects our local and other concerns and treats the CEQA "project" as if it were just the Brunswick Industrial Site and 30 or so wells along East Bennett Road, and (or, if the DEIR were incorrectly permitted to split it off) the Centennial Industrial Site. See, eg, my #'s 3.E, L, and M. I mention those thousands of us with such surface, groundwater, and other rights above and around the 2585-acre underground mine, because we (including me and others on Banner Mountain) are among the larger opposition forces. We not only have the same legal and political concerns as any county voter distant from the mine, but we locals also have direct competing legal rights and standing against the mine as "surface owners" that are not addressed in the DEIR as required. See, eg, my #'s 3.F and N. The reality is that many of the most serious impacts are on those of us living above and around the 2585-acre underground mine. See, eg, my #'s 3.A, B, C, D, L, and N, and 4. As our local legal and political dispute processes and resource competitions persist until the 24/7/365 mining stops (hopefully long before the DEIR's disputed 80-year proposed endgame), I suspect that many other errors, omission, and problems will be exposed by such disputes, competitions, and conflicts mentioned in this and other objections. See, eg, my #15 illustrating hard questions evaded by the disputed DEIR, as well as my rebuttal in # 14 about omitted CEQA disclosures.

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That local resident competition by voters like me is best illustrated by the fact that those of us "surface owners" living above or around the 2585-acre underground mine have our competing groundwater rights. See, eg, #'s 3.F and 5. When (contrary to the incorrect DEIR) climate change dryness and drought (and consequent future reallocations and shortages of NID water) lower our local water table and impact the health of our forests and plants and our access to sufficient water for human and other needs, we locals will sink hundreds of competing new wells for our groundwater, and, if necessary, will change or clarify the laws to accommodate our wells. See my # 3.N. Since it is our ground water too, the related errors and omissions in the DEIR about groundwater recharge will now become much more serious if, instead of 30 East Bennett Road dry wells competing with massive 24/7/365 mine dewatering for 80 years, the mine must compete, if it can, with even the hundreds of new wells used by the thousands of us living on Banner Mountain alone. The DEIR proponents may try to argue that and other such competitions between us surface owners and users and the disputed DEIR 2585-acre underground mine are somehow "speculative" (the disputed DEIR's favorite answer for attempting to evade CEQA by ignoring inconvenient realities). See my #'s 14 and 15. In my experience that DEIR maneuver must fail, as shown in the public records that such groundwater competition has been happening everywhere (eg, the Central Valley, Bakersfield, etc.) where there is insufficient surface water. Competition between surface owners and the DEIR mine is far less "speculative" or "remote" than the DEIR's assumption of no resistance. We are confronting a long-term water shortage from climate change ignored by the DEIR, and sooner or later even these DEIR will be compelled to admit that it will be massively depleting our local groundwater and sending it downriver somewhere else in Wolf Creek. Few of us locals will tolerate being dependent on "recharge" and "balancing" illusions in the disputed DEIR based on the indefinite continuance for 80 plus years of the no longer predictive average rainfall between 1967 and 12017. See my # 3.D, E, F, M, and 5 below.

This is a persistent flaw in the DEIR, where it ASSUMES that somehow the past predicts the future here for a mine closed since 1956. See my # 3.M. Not only does climate

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change create a "new normal, but the disputed DEIR abandons any effort to assess the impact of 24/7/365 mining beyond the first 20 years of its 80-year mining harms (stopping analysis at 2040). See my # 3.M. To the contrary of the DEIR's false operating premise that "what we don't know won't hurt us," which no informed local will accept, we expect to counter that "we are better off being safe than sorry." So, the question for government decisionmakers is whether to make a better-informed decision by requiring the disputed DEIR and miner to fairly address this and other Objections as required (see my # 14), or whether to allow this undesirable mine the undeserved benefit of the doubt it seeks on every disputed issue, despite the mine adding no net benefit to our community. See my #'s 3.E and N, 4, and 8. While there may be modest employment of mine workers from somewhere, they are hugely outnumbered by the thousands of us resolute resistance locals living above and around the 2585-acre underground mine who are committed to the defense of our homes and ways of life from the burdens, risks, threats, and harms addressed in this and other objections. While the mine may pay some taxes and spend some money before exporting its profits to Canada or other distant places (see my #'s 2 and 4 below), the burdens, risks, and problems suffered locally will far exceed any such benefit for a net deficit. See my # 4. The costs and consequences of using 50 to 100 heavy trucks 24/7/365 for 80 years on our busiest, key roads will by themselves overwhelm any possible benefit.

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Under the reality circumstances explained in this and other objections and ignored, understated, or misstated in the disputed DEIR, my experience is that this mine could not long endure under the circumstances the kind of legal and political resistance and competition it will encounter. See, eg, my # 3.N, 2, and 8. **Therefore, the government should at a minimum insist in detail now on the disputed DEIR being reformed to comply with CEQA and disclose better and comprehensively the consequences of stopping and then stopping the mine. See my #'s 3.N, 8, 12, 13, 14, and 15. Remember that, in considering the alternatives (DEIR vs my #'s 13 and 2), the economics of this mine are so fragile that the DEIR admits (at 6-14) it is not viable operating on a normal 12-hour day. See my # 13. Normal realities, court rulings, and political/law reform changes can obstruct what conditions the disputed DEIR insists must be available. See my #'s 2, 3.N, and 13. Then what? See my #'s 3.N, 4, and 13.**

E. Request For The Lead CEQA Agency To Reconsider Its Position Resisting Economic Feasibility Counters To The DEIR Both At the Public Comment Hearing 3/24/2022 And Apparently In Its Upcoming Economic Study.

At the public hearing on March 24, 2022, the County began by incorrectly excluding all consideration of evidence and argument regarding the financial condition and character of the DEIR miner and the financial feasibility of accomplishing key safety and mitigation results assumed in the disputed DEIR, contrary to this and other objections. Since the County had not yet heard any arguments about why that position is incorrect under these particular facts and circumstances, I ask the lead CEQA Agency to reconsider for reasons stated in this section and section 14, as well as in the more technical brief that I expect to prepare before the end of the comment deadline. That is especially important to rebut where the DEIR itself makes financial feasibility statements that this Objections counters with admissions by the DEIR or

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by Rise in its SEC 10K and 10Q filings about this mine (which is its only significant asset). See my # 2. Perhaps the County's such ruling was influenced by thinking that objectors might have a more efficient forum for such excluded objections in connection with the County's coming so-called economic study. But I later learned that study also may be too narrow, focused on other things, and may also mistakenly exclude those considerations. Therefore, I urge the County to expand that economic study as well for these and even more of such objections by me and others. See my # 14.

I am aware of the kinds of **factually distinguishable** court decisions where such challenges failed **under different circumstances than these**, and I invite the County to consider my counter authorities in a supplemental legal argument filing soon in support of my position. Please note here, however, that even Rise's own favorite cases do not allow "bad faith" DEIR claims, such as which are illusory or speculation or bogus assumptions. That is what appears to exist here, since my # 2 proves that Rise currently cannot afford to perform the DEIR and mitigations, even as they proposed them, as distinct from what more will ultimately be required by government or courts or local law reforms if the mine proceeds. That fact, largely based on Rise's own SEC filing admissions (see my # 2), makes the DEIR "illusory" and suggests a lack of "CEQA good faith." That is especially true given all the DEIR's other "strategic" errors, omissions, and deficiencies exposed in this Objection without any good excuse, such as the DEIR occasionally mentioning the use of hexavalent chromium in the mine shoring cement paste in obscure places without any mention of it or its dangers in the DEIR's "Hazards And Hazardous Materials." See also my # 3.E and M, where I illustrate other examples of obscuring data, insufficient data, strategic omissions, and other inappropriate tactics prohibited by CEQA cases like *Banning Ranch Conservancy v. City of Newport Beach* (2017), 2 Cal.5th 918, 940-41 ("**Banning**"), and *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), 40 Cal.4th 412, 442 ("**Vineyards**"), each insisting on "a good faith reasoned analysis," rather than scattered or buried data, and unexplained data in exhibits. See my # 14.

In any event, under the applicable facts and circumstances in this case and a correct interpretation of CEQA and its Guidelines and relevant (as distinct from distinguishable or other lower court decisions to be corrected by the California Supreme Court), I urge that everything in this Objection be considered. I will explain that position in more detail in a supplemental brief to be submitted before the deadline. (The DEIR contained their disputed legal interpretations of various CEQA requirements, and so it's only fair and appropriate for the CEQA lead agency to consider my counters.) In the meantime, I believe that the disputed DEIR is irreconcilable with the following example California decisions (and other relevant cases, statutes, and Guidelines) cited therein, among others to be explained in my supplemental brief. *E.g.*, Sierra Club v. County of Fresno (2018), 6 Cal.5th 502; Concerned Citizens of Costa Mesa, Inc v. 32nd Dist. Ag. Ass'n (1986), 42 Cal.3d 929; POET. LLC v State Air Resources Bd. (2013), 218 Cal.App. 4th 681; Gray v. County of Madera (2008), 167 Cal. App. 4th 1099.

Please remember, even if the lead CEQA Agency were to disagree with me on the technical CEQA merits of such legal disputes, there is one additional reason no agency or court should ever resist full consideration of this and other objections: legal "impeachment" rebuttal (ie, the use of evidence to contradict false or misleading claims) and especially by the use some of the DEIR's and Rise's own words to rebut others. What my Objection does, and other objections could do, is expose with such evidence DEIR's many internal omissions,

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inconsistencies, and contradictions to prevent the DEIR from prevailing inappropriately by exposing contrary or inconsistent statements either (i) within the DEIR, or (ii) in the current Rise SEC Form 10K or 10Q (which, as I show in my # 2, discusses many of the same mining related issues as the DEIR, but in different, inconsistent, or even contradictory ways. The California Supreme Court's most important lesson about CEQA is the need for both clarity and truth; ie, reality. Objectors like me are entitled to challenge such a DEIR that "crosses those lines." Especially at times like this in our divided world's larger conflicts, where constant barrages of false news/propaganda seek to create "alternative realities" (eg, Russia's distortions and worse about Ukraine), it is important to remember that the rule of law itself depends on ruling by one, clear and truthful reality. The disputed DEIR often can be shown to fail that test, and it needs to be redone to clarify the actual realities versus this DEIR's objectionable mine. To do that requires corrections and edits to the DEIR consistent with this and similar objections.

Furthermore, the County should also allow appropriate consideration of accepted matters to which courts take "judicial notice" as matters of fundamental logic or reality, to prevent obviously false or misleading claims from being accepted by denying contrary such proof. For example, if Rise were to say, "Don't worry about any environmental health or safety rules, because I'll just pay any victims to make them whole" (an exaggerated version of the disputed DEIR claim to cover anyone whose well dries up, which my #2 proves is equally illusory or speculative), that implies that Rise had the financial ability to accomplish that false claim. Why? Because such miners are not allowed to just invent nonrealities contrary easily proven facts in the real reality, especially by admission from the person asking a court or government official to join in that fantasy to officially (but incorrectly) pronounce it to become real. When the rule of law applies (and as CEQA must apply here, as I explain in my # 14), no naked "emperor" is allowed to insist that he's wearing a fancy suit, because we allow people to say the clear truth that "this emperor has no clothes." This is what my Objection and other objections seek to do regarding this DEIR: expose the comprehensive reality. For example, the Rise admissions I cite in my #2 should be allowed to rebut that illusory DEIR assurance that somehow, without even knowing the huge number of affected old and new wells over even a shorter period than 80 years, the miner will supply the needed replacement water (at DEIR 4.8-66). Recall that at the March 24 hearing and in follow-up written comments, even NID wanted more protections than the DEIR offered.

Please remember that the DEIR itself put its financial feasibility into issue for rebuttal by claiming (at DEIR page 6-14) that limiting mining to a 12-hour day made the project economically infeasible. Since DEIR uses that claim to defeat better "Alternatives" and mitigation, the law requires consideration of such rebuttals in my Objection and others. That admission by the DEIR itself at page 6-14, by manipulating the data on "Alternatives" thereby legally "opened the door" for all my economic feasibility arguments, and it illustrates the DEIR's inconsistency. The DEIR cannot have it both ways, as when the DEIR wants to plead poverty (like that does), but then it also wants to make implied or express promises of being able to afford whatever mitigation may become necessary (eg, providing water to all dry well owners). We must be able to expose that nonreality one way or the other. See, eg, my #'s 2, 13, and 14. Yet, when the DEIR discusses (eg, 4.8-66) replacing wells the dry up (besides the 30 along East Bennett Road), Rise's current financial condition and questionable future prospects discussed in

my #2 prove (including by Rise admissions in its current SEC 10K and 10Q filings) that it does not currently have the financial capacity to accomplish such mitigation, especially as the climate change the DEIR ignores forces many of us to drill competing wells to reach our own groundwater as NID supplies are reduced. See, eg, my #'s 3.D, E, F, M, N, 4, 5, 8, 13, and 14. Indeed, that is what the DEIR itself admits it cannot accomplish (at 6-14), if it's limited to a 12-hour workday, as objectors will still demand. A CEQA compliant DEIR (see my # 14) would have to disclose such realities, and when (as here) the DEIR fails to do so objectors must be allowed to expose them.

Furthermore, **another DEIR "opening of the door" to my less CEQA-traditional rebuttals is the DEIR's "Non-CEQA Related Analysis" at 4.3-103-04, incorrectly purporting an attempt to show "good faith," but allowing us to prove the opposite if we are allowed to do so. My point on this also includes this related DEIR admission: that some of what the DEIR and apparently the County consider to be outside some disputed CEQA boundary is needed for essential clarity. This means one of two, alternative, admitted things, either the disputed DEIR's CEQA "boundary" is wrong, or essential clarity of purpose and what they incorrectly consider "good faith" requires going beyond the CEQA constraints, as explained in my # 14. Either way, if the DEIR can include what they call "Non-CEQA Related Analysis," then we objectors must be able to respond and counter in kind.**

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This cannot be a one-sided process where the DEIR can make any nonfeasible, false, or misleading claims they wish, while objectors are not permitted to rebut and expose those claims. See my # 14 and the supplemental brief. The reality is that in many cases the DEIR fails to comply with applicable law, because its purported safety and mitigation assumptions and so-called facts, goals, and contentions addressed in this Objection and others are not only incorrect, deficient, and otherwise noncompliant with CEQA, but also are illusory. See my # 2. The CEQA lead agency must allow us to prove those wrongs by accepting our substantial evidence to the contrary, including fatal admissions by the DEIR and the miner, including as to economically infeasibility. As I prove in my #2 above, Rise and its accountant admit that there are "going concern" financial issues that make its performance at best too speculative for the DEIR's unqualified claims and at least as to some things admittedly infeasible. When a miner's accountant warns its investors to beware that its mining plans may to be feasible for lack of sufficient funds, how can any responsible government not at least test at least the more obvious DEIR illusions by allowing objections like this? See # 2 and 14.

F. **The DEIR Does Not Address Serious Questions About Rise's Financial Condition Appearing Even From Its Own SEC 10K and 10Q Filings (See My # 2), And My Related Experience Is That There Are Dangers In Relying On Infeasible Promises From Miners Whose Ability To Perform Or Comply Is Uncertain (Or In This Disputed DEIR, Too Often Just Unsubstantiated Assumptions), Instead of Requiring Meaningful Assurance of Performance And Capabilities To Perform. Also, Some Comments On Foreign Dynamics And Possible Miner Tactics.**

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The DEIR advocates implicitly assume (incorrectly) that the miner's financial condition is irrelevant to the CEQA environmental analysis, but Rise has admitted in its SEC Form 10K and !0Q weak financial circumstances that I address at #'s 2 and 14 in this Objection. Basic economics are critical, because nothing the disputed DEIR promises or assumes for timely CEQA or environmental compliance and mitigation is real, feasible, or credible, if (as appears to be the case) Rise cannot afford to satisfy such DEIR and legal compliance requirements. Moreover, governmental decisionmakers should not have to speculate about how (or if) anything merely assumed in the DEIR actually will happen. (When read closely, many of what DEIR wants to appear as somehow logical deductions, are really just flawed assumptions.) And, if what us local voters and parties-in-interest fear and expect to confirm in other proceedings where such financial infeasibility can be exposed, then everyone will be worse off for now allowing this mine threat to continue. Our environmental protections are only meaningful if they are timely accomplished. Empty and nonfeasible promises or false assumptions of things that will never be accomplished would leave us exposed to mine horrors that CEQA was supposed to prevent. To quote that old fable, this wannabe DEIR "emperor has no clothes" and he's ugly.

I cite my background above in # 1.B, because it qualifies me to offer informed opinions on various matters relevant here. For example, government decisionmakers need to do extensive due diligence on this miner, its parent corporation (Rise Gold Corp), and its "insiders" (a broad bankruptcy term that includes officers, directors, controlling shareholders, control groups, and others in sophisticated leverage positions of practical control). See my #2. I suggest that you begin by considering at least the public record about the financial condition and financial performance capabilities of Rise Gold Corp. from its current filed SEC Form 10K and 10Q annual and quarterly reports on its website. I quote illustrations with disturbing information in my # 2 below, including Rise's own management discussing its accountant's "going concern" warning in its financial statements. That alone should raise questions about how this company wishing to be a miner with this one and only speculative mine with uncertain prospects, insufficient and limited reported working capital and credit resources at present could timely perform and accomplish what is contemplated by the disputed DEIR, not to mention affording many other mitigations and changes that should be required or be triggered in response to this Objection and others. I give additional examples in my #'s 2, 3.N, 13, 14, and 15, which combined cause me to consider the risk of lending or financing this mine, even as insufficiently contemplated in the DEIR, to be highly speculative or worse. That suggests that, besides evaluating this miner's ability to perform and comply, government decisionmakers should also investigate whether this may be a "flip" situation, where some successor or new controlling party "behind the curtain" will become the real miner in this situation. See, eg, my #'s 2, 14, and 15.

I complain repeatedly in this Objection about the many times the disputed DEIR declines to "speculate" about the future, in effect demanding blind and undeserved trust to it unsubstantiated assumptions or opinions. See, eg, my #'s 3.E and M and 14. For example, consider the DEIR's excuse for only providing limited and insufficient information on key issues, and declining to discuss the mine water risks beyond the first 20 years of its 80 year of threatened operation (or after 2040), despite the scientific realities predicting that progressive climate change and global warning droughts will make the future cumulatively

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and progressively worse here. See my # 3.E and M. There is far more reason to expect that the last 60 or 65 years of its 80 years (or after 2040), for which the disputed DEIR makes no meaningful CEQA comments, to be much worse than such first 20 years (or until 2040) that are inadequately addressed in the DEIR and for that first 20 years (and until 2040) to be much worse than the prior history (eg, average rain between 1967 and 2017) on which the disputed DEIR incorrectly attempts to rely. See my # 3.M. My experience is that what matters is not what is promised by some miner (note that all the owners of the more than 40,000 abandoned California mines on the EPA list made such promises), but rather what is proven with evidence to be feasible and credible to be performed and accomplished. The key question for you decisionmakers is what you can reliably expect the miner to accomplish timely. See, eg, my #'s 2, 3.E and M, and 15. Since this DEIR miner admits currently to have deficient funding compared to its plans (see my # 2), it is at best unreliable speculation to rely on the DEIR. Hopefully, our government will share the cynical expectations/fears of the thousands of locals like me living above or around the 2585-acre underground mine, who are facing all the burdens, risks, and problems described in this Objection and others from someone whose performance and mitigation is so uncertain. See my #'s 2, 4 and 14. Remember that there is only downside for us locals from this no net benefit mine (eg, my # 4), making such risks on the DEIR worse than foolish.

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Rise Gold Corp and its subsidiary are both Nevada corporations, a common strategic liability defense practice historically in the mining and other industries. However, the controlling parent company is headquartered (and where the Rise Grass Valley subsidiary appears to have its key office) in Vancouver, British Columbia, and the senior officers and most directors in control of the enterprises are based in Vancouver. I refer to **"Rise"** collectively because the Grass Valley mine subsidiary appears controlled by its Canadian parent operating their primary common asset: this mine closed and flooded since 1956. See my # 2. While they may have complex legal and tax strategies for two such companies operating one mine and related equipment as their only major record significant asset, I will treat them in this Objection (as I expect CERCLA and adversaries will do) as one enterprise.

I also refer to Rise as a **"foreign"** enterprise because its senior management is controlled from Canada, and many of its shareholders appear to be non-US persons, although there appear to be some US private equity or hedge funds involved from places distant from Grass Valley. As a cross-border insolvency lawyer, the issue for me is have they arranged the capacity for a Canadian CCAA and/or Nevada insolvency proceeding, if they were later to choose that defense. Thus, Rise is "foreign" in many senses of the word that combine for the functional point that they are not a typical, "local" Grass Valley business, in the sense that most or all the profits Rise distributes to shareholders will be enjoyed by many non-US persons and distant US persons and cannot be expected to benefit the local economy of our community. See my #'s 2 and 4.

As a general matter before considering this DEIR miner (who may be an exception but has made no case in the DEIR for being an exception), my experience suggest caution. Should any miner (especially such a "foreign" miner in a financial condition similar to what Rise admits in my # 2) ever need protection from creditors, or exhaust its working capital and credit, or wish to arrange a distress sale of the mine, or seek to block creditors from enforcing claims against insiders, the common, historical mining industry practice in that situation (if it had sufficient

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funds for such tactics) would be to file a CCAA insolvency case in Canada, likely with a related US Chapter 15 case and perhaps a related US bankruptcy case in Nevada (although they would prefer the Southern District of New York, if they wish to gamble on a venue fight). These traditional mining industry arrangements and related tactics have been successful in many prior mining distress situations in frustrating and disappointing local US mining creditors and their mine's communities. If one were to backtrack down the trail of abandoned mines on the EPA list, including the more than 40,000 in California, one would find that to be a common pattern. However, if there is no buyer or sufficient financing for the mine, the historical miner practice may have simply been to elect the cheapest escape route by filing a US Chapter 7 liquidation, in which the court appointed trustee usually exercised his or her right to abandon the assets, leaving a no asset shell, whose bankruptcy can frustrate pursuit of insider claims, which are the often unmotivated trustee's exclusive right to pursue, although such trustee could perhaps sell the Chapter 7 estate claims cheap to someone friendly to the defendants. My point here is that many miners in such other historical cases have successfully used these and other tactics to achieve a result in which the shareholders and insider defendants (especially foreign persons) end up keeping their profits, and the local victims and communities recover much less and are almost always disappointed and frustrated. Local governmental authorities, who must then deal with the mess when the abandoned mining stops, are also harmed and burdened. These tragic, history lessons are one reason why savvy governmental authorities are very careful about with whom they deal in such risky mining situations, and insist on extensive due diligence, particularly as to character, track record, and financial responsibility. See my #'s 2, 3.N, 14, and 15.

G. Disclaimer Of Personal Experience With Rise, But Rather with Experience As To The Mining Industry From Hundreds of Other Failed Mines That Lead Me to Suggest More Hard Questions (see, eg, my #'s 2, 3.N, 14, and 15) And Due Diligence Before Tolerating This Disputed And Insufficient DEIR Or Approving This Mine Reopening.

As explained in the preceding subsection, there are more than 40,000 abandoned mines on the EPA list in California alone for common reasons, one of which is that their miner ran out of money, another is that they completed or disappointed in their local economic exploitation and retreated to a foreign location with their mining profits (often leaving a mess without promised reclamation or restoration), and another is that they were frustrated by local political and legal enforcement and resistance or water competition by local victims and then retreated, using a common pattern of technical legal bankruptcy and other maneuvers to protect the responsible insiders and disappoint the local creditors and mine neighbors. See the preceding subsection and my #'s 1.D, 3.N, 4, 14, and 15.

In any case, as to the future performance capabilities of this DEIR miner, government decisionmakers are not required to speculate on whether, when, or to what extent this miner could raise the necessary cash and working capital to even accomplish timely the insufficient things that are contemplated in the disputed DEIR. The burden of proof and persuasion on such financial and other feasibility are on this DEIR for mining plan performance and CEQA compliance. However, the rest of us local residents who are threatened by this DEIR plan are

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entitled to ask government decisionmakers to ask this DEIR miner, how and when is this miner going to raise sufficient working capital, and is this really just an effort to set up the mine for a "flip" to an undisclosed successor to replace them or to another controlling person behind the curtain? See, eg, my #'s 2, 4, 14, and 15. Who does this DEIR mining matters, because in my experience there are many historical horror stories in this mining industry about devastated local communities. Surprisingly for someone whose DEIR omits essential disclosures apparently to reduce controversy (see, eg, my # 3.E), this disputed DEIR revealed its planned use of hexavalent chromium, although in obscure places, creating water pollution risk that makes people wonder if this will become "another Hinkley" (featured in the *Erin Brockovich* movie), as discussed in my #'s 3.C, G, and H, and 7.

I add this disclaimer that I do not address my generalizations about the mining industry and other historical situations as personal challenges to Rise, since I only know what is on the public record about the DEIR and Rise team (and only some of that). Perhaps Rise is different from the other miners with whom I and others have had unsatisfactory prior experiences. However, there are many errors, omissions, and deficiencies in this DEIR as addressed in this and other objections, whatever else may or may not be in controversy by association with an industry with a history of objectionable or worse players leaving over 40,000 abandoned mines in California on the EPA list. In any case, when addressing a particular unknown company or person in any such risky situation, like reopening a mine closed and flooded since 1956 with limited reported funds and information (eg, my # 2), it is prudent for government to ask questions, especially in doing due diligence about anyone in an industry that history has shown often to conflict with local communities for what the residents consider to be good cause. While the mining industry has many "players" who should never be allowed to operate here, considering their record, a reason to ask questions about the risk of a Rise "flip" to some other miner or some change in control to someone "behind the curtain," I do not know Rise Gold Corp or its only subsidiary or their insiders personally. Therefore, it is possible that they are somehow an exception to the often-problematic standards of the mining industry, although that does not excuse the flaws in this DEIR or the questions about their financial circumstances and other issues in this Objection. Hint: if a miner tells us that it is doing something by the "industry standard," insist, instead, that it be done in accordance with the higher standard of applicable law. In my experience the loose concept of "industry standards" were cited and misused by many of those more than 40,000 abandoned California mines.

H. Preview of Coming Attractions in This Objection And the Hard Questions (See, eg, My #'s 15 and 3.E) Ignored in the Disputed DEIR That Cannot Properly Be So Evaded Or Deficiently Addressed.

The organizing principle of this Objection begins with this discussion of the players and some general concerns (like those illustrations summarized in this opening section) that should be in the readers' minds as they consider the more detailed and specific objections that follow. For example, as government decisionmakers read the DEIR and my Objection, please consider at least three important common errors, omissions, and deficiencies that I demonstrate below in the flawed or worse DEIR mine pitch. First, whenever the DEIR addresses a controversial

issue (eg, like its incorrect and unsubstantiated assumptions about the groundwater recharge rate or "balancing" versus realities described in my #'s 3.D, E, F, and M, and 5), the DEIR incorrectly assumes that one can judge the next 80 years of 24/7/365 mining based on the past (or, as to inapplicable NID data, for what happens after 2040 from what happened earlier). See my # 3.M. Such DEIR assumptions ignore the "new normal" of climate change causing unprecedented, chronic dryness, drought, and other environmental problems (eg, the DEIR projects groundwater recharge based on the average annual rain between 1967 and 2017, which is not predictive of the future at issue, especially since the dewatering from our shared groundwater is being disposed of downriver somewhere else by the miner). See, eg, my # 3.D, E, F, and 5.

Second, the DEIR claims (and we dispute) that any analysis of its mining beyond the next 20 years (or 2040) is "speculation," so that they incorrectly claim CEQA allows them to avoid discussion of any burdens, risks, or problems in the last 60 years of its mining (or after 2040) until they close the mine. See my # 3.M and 14 and my supplemental brief. How can any responsible government gamble on that kind of "leap of faith" or "wishful thinking" for an undesirable mine without any net benefit to the community (see, eg, my # 4) managed in this kind of situation with such admitted financial challenges (see, eg, my # 2), especially as every quality scientist assures us that the next 80 years will become progressively worse for our climate, our weather, and our quality of life. See, eg, my # 1 and 3.M.

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Third, even apart from mine advocates' meritless demands for DEIR approval, despite such errors, omissions, and deficiencies and without sufficient reliable data, time and again my Objection reveals that the disputed DEIR assumes, without sufficient proof or even valid logic, that the past is predictive of the future. But see my #'s 3.M and 14. Despite my such documented rebuttals and others, the disputed DEIR insists both that the last 60 years after the next 20 years (of 80) (or after 2040) must be the same as those first 20 (or before 2040), and also that nothing has changed between either (i) the closing and flooding of the mine in 1956 and now, or (ii) now and what happens underground as they mine in new and expanded places and deeper without knowing what substances and problems they will encounter. See, eg, my #'s 3.E and M. For example, maybe the arsenic, asbestos, and other hazardous chemicals that were insufficiently addressed in the DEIR will get even worse in the new mining, or maybe they'll encounter and unearth new and worse toxins. See my #'s 6 and 7. The point is that the disputed DEIR speculation allocates that risk of their unknowns onto us neighbors above and around this undesirable, no net benefit, 2585-acre underground mine, instead of correctly assigning those risks to the mine owner whose profits will not stay in our community. See, eg, my #'s 3, 4, 6, 7, 8, and 14.

What follows such discussions is a detailed analysis in my #'s 3 – 13 of my top 50 plus specific errors, omissions, and deficiencies in the DEIR. My typical approach is to quote or cite such an objectionable DEIR provision, and then expose corresponding illustrative errors, omission, and deficiencies, often by reference to my more detailed analysis in a following section of this Objection addressing a particular threat topic, like groundwater depletion, hexavalent chromium, or other hazardous materials, etc. In many cases I use the DEIR's own inconsistent or conflicting words against the DEIR, since the DEIR reads like it was written by different people whose coordination was imperfect and some were less connected to reality than others.

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What follows that demonstration of DEIR errors, omissions, and deficiencies is a summary list in my # 15 of hard questions evaded or inadequately addressed in the disputed DEIR, as a practical means of an illustrative summary that may be useful to the decisionmakers. If such hard questions (and others in my #15 for follow up) are not addressed in this process, and if the DEIR and mine are allowed to proceed to the next challenge stage, triggering more resistance in other forums and in the political realm, these questions will ultimately be asked and answered in the resistance processes to come. That creates an "I told you situation" that is best to avoid, not just for the sake of harmony in our community and lives, but also because the longer this doomed mine approval process continues before it stops the mine, the worse off we all will be. And that is the final question that DEIR decisionmakers must ask: what happens if the mining starts and then stops, whether from the resolute local opposition, or from the simple, inability of the mine to endure overlooked burdens and consequences of inconvenient reality and truth, from orders of a court, or from resistance, law reform and other political changes (see, eg, my # 3.N), or otherwise.

In assessing such perpetual legal and political conflicts that approval of the disputed DEIR or mine would unleash, I ask the decisionmakers to consider the practical realities and the effects of local competition from us locals against the mine, such as over our owned groundwater. See my # 3.N. This was a highly speculative effort by a small, risky, and financially challenged Canadian based miner with just this one mine. See my # 2. When adequately informed of the realities, the whole of the impacted local community can be expected to join what is already a substantial resistance, as demonstrated at the March 24 County hearing. See, eg, my #'s 3.N and 8. No public relations games by this DEIR mine could possibly overcome the concerns of those thousands of us living on the surface above or around this 2585-acre underground mine, when they discover the burdens, risks, and harms already now identified in objections like this one, threatening our homes, our environment, our forests, our suburban (not rural) community, and the way of life we have long enjoyed. When *Sunset Magazine* named Nevada City one of the best retirement places in California just before I retired in 2015 and moved up here, no one imagined such threats from a mine closed in 1956. Therefore, the decisionmakers should consider the common pattern and consequences of such local residents and voters enforcing their legal and political rights and competing for shared resources until the mine stops. Our numbers of such local residents and other objectors at dwarfs those few imagined new jobs for workers from somewhere. See, eg, my #'s 4 and 8.

The long analysis that follows demonstrates some of the many reasons why we decline to suffer this mine underneath us, and it is not practical to even list objections here, much less explain them, which is why I incorporate other objections below. These concerns are about more than just the traditional CEQA environmental issues, such as about hexavalent chromium, depletion of our groundwater by the mine dewatering without the illusory recharge and balancing theory of average rainfall between 1967 and 2017, and other issues addressed here and by many objectors. I also urge your special attention to these disputes where my special expertise becomes relevant. That experience inspires me to suggest that you should study closely not just the disputed DEIR, but also the current SEC 10K and 10Q on the Rise Gold Corp. website (see, eg, my # 2), since assurances in the DEIR about CEQA and legal compliance, safety, and mitigation are meaningless, if the miner lacks sufficient working capital and resources to perform timely even what it assumes in the disputed DEIR, much less the additions

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for which us locals will be advocating, as described in my # 3.N. In all my decades of bankruptcy, cross-border insolvency, and insurance insolvency cases, I can count on two hands the number of times when victim creditors and communities have achieved recoveries they considered adequate, even from companies with much stronger balance sheets than this miner. Cross-border mining cases are usually especially disappointing. The time to save our community from such grief is now, not later when resistance ultimately stops the mine, and we must then confront the residue.

I. Incorporation By Reference of Other Objections And Comments.

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Except for only a few less relevant or compatible comments that violated the civility or personal character challenge rules of the Commission, as to which I express no opinion, I was impressed by almost all the hundred plus comments presented at the March 24, 2022, Planning Commission hearing. I incorporate those such appropriate DEIR opposition comments at the hearing, as well as their speakers' relevant follow-up written filings further expressing and expanding on such oppositions, particularly these comments and filings I specifically incorporate of: the Community Environmental Advocates Foundation (aka the CEA Foundation) and its constituent group allies opposing the mine; Minewatch Nevada County and its coalition members, including the Sierra Cub, Wolf Creek Community Alliance, San Juan Ridge Taxpayers Association, the South Yuba River Citizens League, and others; and Friends of Banner Mountain. When the transcript is available and I have access to the other written objections on the record of what is filed by the April 4, 2022, deadline, I will be more specific about what else I incorporate for the record. But apart from the occasional personal attacks on our adversaries, as distinct from the attacks on the DEIR and the Rise public data (eg, its SEC filings and public records addressed in my #2), government decisionmakers should assume until then that all of us affected locals share common interests and concerns in opposition. Our differences are more about our respective individual knowledge, experiences, and qualifications, rather than about our shared opposition to the disputed DEIR, which impacts, hurts, and risks us all in many common ways, although we each may only know presently some of those different ways. As our resistance gets better organized by what we read and hear from each other, we can be more specific about our such incorporations by reference and can arrange better delegations and allocations of commentaries among our respective specialties.

2. Rise Gold Corp./Rise Grass Valley Inc. Capability of Performance Questions Raising DEIR Feasibility And Credibility Doubts.

A. General Reported Financial Condition Concerns And Issues Make the DEIR Assumptions And Projected Accomplishments Speculative At Best.

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Because this disputed DEIR mining operation admits to being economically marginal (at 6-14), and even the desired gold revenue is admitted to being speculative, as discussed below, the questionable financial condition and capabilities of the miner, Rise, become even more

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important. Absent sufficient assurances of timely funding or credit to perform what is planned or represented, the disputed DEIR is just wishful thinking or worse (or something to flip to who knows who). These economic issues of concern regarding the mine and the mine owner are generally ignored in the disputed DEIR, although relevant as I explain in my # 14. When occasionally something relevant to economics is mentioned in the DEIR (eg, at 6-14 or 4.3-103-104), it is not addressed much or sufficiently. These dynamics cause the disputed DEIR to be fatally flawed and deficient by never discussing the fundamental environmental and other problems and harms that would result from starting and the being unable financially or otherwise to continue mining operations and mitigations as planned, especially while us thousands of resolute and motivated neighbors above and around the 2585-acre underground mine are continuously exercising our legal and political rights to compete and resist the DEIR and mining. However bad that situation may become, any risk/benefit standard would conclude that the DEIR and mine should never have been approved in the first place, especially considering this is a no net benefit mine operation (see my #'s 4 and 14).

Even if the DEIR were correct, compliant, and sufficient, which I and others dispute, government decisionmakers must decide if it is reasonable to rely on Rise's financial capability timey to perform and accomplish all the many essential things promised or assumed to occur in accordance with the disputed DEIR. A non-feasible DEIR is wishful thinking or worse that does not comply with CEQA and other applicable law. See my # 14. Nothing in this DEIR record reflects any rational basis for assuming DEIR feasibility or credibility, as the DEIR does without any substantial evidence at all, and despite all the contrary admission I address below and elsewhere. **A review of the Rise website posted financial statements filed with its current SEC Forms 10K and 10Q suggests that potential victims of the mine have reasonable questions about the financial credibility of the DEIR's expected mitigations and protections, especially since there is no sufficient discussion about what happens if this DEIR miner has insufficient cash, credit, and resources to timely accomplish what is needed to avoid or mitigate the problems we fear and address in this and other objections. As a bankruptcy lawyer with nearly a half century of experience with failed mines (see my # 1), the lack of timely and sufficient working capital, cash flow, and credit are the most common problem of mine failures. There are more than 40,000 failed and abandoned mines in California alone on the EPA website, for similar reasons. I also suggest financial credibility and performance capability investigations by government decisionmakers about the disputed DEIR and Rise, because, for example, the most recent SEC Form 10Q report dated 10/31/21 on the Rise Gold Corp. website states the following "going concern" admissions first at F-5 and then at F-20:**

> The Company is in the early stages of exploration and, as is common with any exploration company, it raises financing for its acquisition activities. The accompanying condensed consolidated interim financial statements have been prepared on the going concern basis, which presumes that the Company will continue operations for the foreseeable future and will be able to realize assets and discharge liabilities in the normal course of business. The Company has incurred a loss of $212,300 for the three-month period ended October 31, 2021, and has accumulated a deficit of $19,756,777. The ability of the Company to continue as a going concern is dependent on the

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Company's ability to maintain continued support from its shareholders and creditors and to raise additional capital and implement its business plan. There is no assurance that the Company will be able to obtain adequate financing in the future or that such financing will be on terms advantageous to the Company. However, the Company has been able to obtain such financings in the past. The consolidated financial statements do not include any adjustments that might be necessary if the Company is unable to continue as a going concern. On October 31, 2021, the Company had working capital of $474,447 (vs July 31, 2021 - $956,524), including cash of $376,179. As such, these material uncertainties cast a substantial doubt regarding the Company's ability to continue as a going concern.

Furthermore, the novel coronavirus outbreak ("COVID-19") was declared a pandemic by the World Health Organization in 2020. The situation is dynamic and the ultimate duration and magnitude of the impact on the economy and the Company's business are not known at this time. These impacts could include an impact on the Company's ability to obtain debt and equity financing to fund ongoing exploration activities as well as its ability to explore and conduct business. These consolidated financial statements do not give effect to adjustments that would be necessary to the carrying values and classification of assets and liabilities should the Company be unable to continue as a going concern. (At F-5)

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The Company expects to operate at a loss for at least the next 12 months. It has no agreements for additional financing and cannot provide any assurance that additional funding will be available to finance its operations on acceptable terms to enable it to carry out its business plan. There are no assurances that the Company will be able to complete further sales of its common stock or any other form of additional financing. However, the Company has been able to obtain such financings in the past. If the Company is unable to achieve the financing necessary to continue its plan of operations, then it will not be able to carry out any exploration work on the Idaho-Maryland Property or the other properties in which it owns an interest and its business may fail. As such, these material uncertainties cast a substantial doubt regarding the Company's ability to continue as a going concern. (At F-20)

Similar statements were made in the Rise Form 10K SEC annual filing for the fiscal year ended July 31, 2021, also posted on the website, as stated by the Vancouver, Canada, Davidson & Company LLP accountants, including the following at page 49:

The Company has incurred a loss of $1,603,878 for the year ended July 31, 2021, and has accumulated a deficit of $19,544,477. The ability of the Company to continue as a going concern is dependent on the Company's ability to maintain continued support from its shareholders and creditors and to raise additional capital and implement its business plan. There is no assurance that the Company will be able to obtain adequate

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financing in the future or that such financing will be on terms advantageous to the Company. However, management believes that the Company has sufficient working capital to meet its projected minimum financial obligations for the next fiscal year. The consolidated financial statements do not include any adjustments that might be necessary if the Company is unable to continue as a going concern. ***On July 31, 2021, the Company had working capital of $956,524 (2020—working capital of $3,267,744.)

Also, note that the Rise 10K at p. 6 states: "As of the date of these consolidated financial statements [7/31/21], the Company has not established any proven or probable reserves on its mineral properties and has incurred only acquisition and exploration costs." (Emphasis added) That lack of any gold value data prevents lending or investing except on a highly speculative basis. That credit and investment risk becomes even more clear in other statements, such as:

> **No estimates of mineral resources have been prepared for the I-M Mine Property. We are not treating historical mineral resource estimated as a current mineral resource estimate. In addition, there are no mineral reserves estimates for the I-M Mine Project. (10K at 34, emphasis added)**

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What that means is that, until the mine is dewatered and prepared for operation, so that the ancient, pre-1956 closure data can be updated, the creditworthiness of Rise for raising money appears limited to speculators. That makes the credibility of the DEIR's wishful thinking about sufficient money magically appearing to accomplish its disputed DEIR goals seem even more of a fantasy risk. Even speculators are used to betting against some data about proven or probable reserves.

These financial "going concern" issues relate, among other things, to the fact that the reopening of the mine in accordance with the DEIR will require a huge amount of working capital and capital investment which Rise does not presently report and as to which they report no financial commitments. Indeed, the entire economics of this DEIR project and the miner are mysterious and speculative. Any such financing will be complicated by the existing Rise $1,000,000 loan secured by the mine real estate as reported in some detail in that annual 10K, with less but some updated data in that most current 10Q filing. **Among the consequences of that financial uncertainty (at best, and presumed disability) to accomplish timely the DEIR goals and mitigation promises and assumptions, even as to what little is admitted by the DEIR to be necessary for the commencement of operations, many months after beginning work (eg, months of dewatering and then pre-start work) and follow up new mine work would be necessary before any gold revenue could be received, even if they were able to find sufficient quantities of gold to cover the costs.** Those circumstances raise many questions that are not addressed in the DEIR, such as: **Are we suffering all this just as an option for Rise to market this situation to someone else? Ie, is this just a "flipping" or fronting situation to or for one of Rise's significant shareholders or other Big Mining allies or someone else "behind the curtain"? Why should anyone approve a DEIR that the applicant demonstrates no current ability to afford to perform? What harms are done if the work commences and stops for lack**

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of funds at different points in time? What happens to our environment and community if, perceiving their inability to comply and perform, the DEIR miner or its successors were to file Chapter 11 cases in Nevada and/or Canadian "CCAA" insolvency cases with related Nevada or New York Chapter 15 cases to stall for time, while they seek a buyer to use such cases in ways that are likely to provoke and disappoint us neighbors and our community? See also my # 15, addressing many hard questions that the disputed DEIR fails to address satisfactorily or often at all.

Besides these obvious cash flow and working capital deficiencies, the 10K and 10Q financial statements and commentaries raise other concerns. For example, **the 10/31/21 "Plan of Operations" states at F17: "Our plan of operations for the next 12 months is to continue the Use Permit process in Nevada County, California, to re-open the Idaho-Maryland gold mine at the I-M Mine Property." However, there is no identified source of funding for that accomplishment. For the quarter period ending 10/31/21 the 10Q reports a net loss of $212,300 (compared to a 2020 such net loss of $1.025,358), while the 10K reports an annual net loss in 2021 of $1,603,878 (following a net loss in 2020 of $5,471,535) at page 38. Again, there is no explanation of how that DEIR project is possible given limited funds and resources. Note the only significant Rise assets are the mine, already subject to a secured loan of $1,000,000 discussed in the 10K at 58-59.** According to that 10K and the 10Q (at F-7-8) Rise purchased the Idaho-Maryland Gold Mine property in 2017 for $1,950,000 plus stock warrants, plus another contiguous 82 acres for $1,300,000. While Rise states in the 10Q at F-8 that as of 10/31/21 it has incurred cumulative exploration expenditures of $7,224,186, that investment has not created the kind of cash value assets against which even asset-based lenders would extend credit, especially in a second lien position (if that were even permitted by the existing first lien lender) or in a refinancing of the existing debt with additional credit. **See 10K at 45 listing total book value of assets at $5,881,260 ($4,149,053 for the mine and $575,781 for equipment). In my experience this means that this additional funding likely will have to come from some new controlling party, whether as a "last in money" controlling partner, an investor acquiring control by diluting the existing equity, a profit-sharing miner tenant, a "loan to own" lender, or some other change in control transaction. (The theory of Rise raising sufficient equity for what seems to require massive funding needs seems unlikely, because, even if there were enough speculators willing to invest, the dilutive effect of that size of new investment would seem to wipe out the existing investors and incite them to consider the usual legal recourse for such shareholders, which would further complicate Rise's financial situation.) Don't DEIR governmental decisionmakers wish to know with whom you are really going to be dealing? See my # 14.**

Any serious analyst of the disputed DEIR should also read the Rise Form 10K filing, because it actually contains more useful mining related disclosures on some important mining topics than does the DEIR. See my # 3 - 13. That reality supports the concerns of many of us that the disputed DEIR may have chosen not to address such inconvenient truths that would reflect badly about the disputed story presented in the DEIR. For example, while the Form 10K is still an inadequate discussion of the facts of concern to those living on the surface above and around the 2585-acre underground mine, the 10K discloses and admits much more



than the seriously deficient DEIR. See, eg, my # 3.E. Why? Apparently, this DEIR miner is apparently more concerned with (what it considers to be) adequate disclosure to the SEC and shareholders than to the governmental decision makers reading the less informative DEIR.

I (like others) ask the governmental decisionmakers to consider what us locals and our community will suffer, if the many predicted problems occur, including some that even the DEIR admits, but somehow nevertheless assumes will be mitigated or solved by the large, necessary amounts of money Rise financials report that it does not now have and (considering the accountant's going concern warning) may never have. We, of course, also worry about the additional problems, risks, and issues identified in this Objection and others (but often omitted or deficiently described in the disputed DEIR) that would require substantial new funding from uncertain sources. Where is that money coming from in time? Yes, Rise perhaps might be able raise money from high-risk speculator type investors in the US or Canada or even some high-risk taking, asset-based lender taking a huge "equity kicker." Yes, Rise might perhaps be able, **eventually** to turn recovered gold into operating cash flow, assuming it had sufficient funding to bridge itself to that distant stage when it could begin to recover gold (and assuming there was sufficient gold there to be extracted), although the closed and flooded DEIR mine production first requires both substantial dewatering and start up time and expenditures and many other expensive activities long prior to any possible gold production and revenue, if they are even able to find commercial amounts of gold in time. No such initial operating reserve cash funds or financing commitments appear on those financial statements. So, where is any proof that any of the DEIR plan is feasible? To the contrary, Rise's own accountant questions its "going concern" capability, recognizing that the whole DEIR is speculative at best. See my # 14. Considering the horrible consequences to our community for a botched mine reopening (eg, see my #'s 3 - 15) and then closing for lack of funding or on account of other reality problems or local resistance or otherwise, it seems irresponsible for government to trust in the DEIR's wishful thinking as to anything in this disputed DEIR being feasible or plausible, even if it were not so full of errors, omission, and deficiencies as are listed in this and other objections.

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What all that likely means is that Rise may need a "money partner" and "change in control transaction" to fund what is contemplated in the disputed DEIR, as well as what more work objectors like me expect the mine to need for funding compliance, performance, and dealing with what more we expect would be required by law or government, but which risk the DEIR fails to address adequately or at all. See my #'s 3.N. and 14. Government decisionmakers here should ask: is this applicant just taking this risky investment in hope of acquiring mining rights that it cannot itself exploit to "flip" the mine to some more viable, but possibly more dangerous or unsuitable company? (Incidentally, that is a not uncommon tactic for earning a return from the real mining company that may emerge from somewhere to do what this applicant cannot financially accomplish by itself as a managing partner, operating tenant for profit sharing, loan to own lender, or etc.) If that is the case, it should matter as much to our governments as it does to us locals who that "real miner" will be. Some miners out in this global industry might be interested in such a "flip" to them of this opportunity, but many are the sort of companies who would be unlikely to have been successful in trying to win direct approval themselves, even though they have ample funding, if our government

decisionmakers did character or track record checks. We all should want to know the suitability, character, financial capabilities, environmental orientation, and track record of whomever wants to mine 24/7/365 beneath our suburban neighborhood for the next 80 years. So, ask yourself, given the Rise financials, who is the "real miner" to be here?

In particular, one historical tactic used by this industry for government scrutiny generally is when a mine owner leases the mine to another even more unsuitable and less safe operator-tenant for a share of the profits and other compensation, and then the tenant does bad things and the landlord claims under older, disputed case law (as to which there are important exceptions and factual distinctions) that the landlord miner is not liable for the (often then bankrupt) tenant's wrongs, as in cases like *Butte Copper & Zinc Co. v. Poaque*, 164 F.2d 201 (9th Cir. 1947). See my #'s 3.N, 14, and 15, where I predict legislation or initiatives that could improve our surface owner and user defenses against such abuses, if any such things were ever attempted here. (Again, I have no idea what this DEIR miner intends to do, but any responsible government mistakenly allowing such 24/7/365 mining for 80-years underneath us needs to protect us surface owners and users above and around the 2585-acre mine from any such possible risks.)

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WHEN THE DISPUTED DEIR ADDRESSES ALTERNATIVES TO THE MINING OPERATING PLAN AT ITS # 6 (my # 13), IT ADMITS THE FOLLOWING (AT 6-14) IN A DISCUSSION ABOUT ITS ALLEGED INABILITY TO REDUCE ITS 24/7/365 OPERATING PLAN TO A NORMAL 12 HOUR DAY: "CAPITAL AND OPERATING COSTS WOULD INCREASE SUBSTANTIALLY AND LIKELY MAKE THE PROJECT ECONOMICALLY INFEASIBLE." That proves how fragile the operating margins of this mine are expected to be. See, eg, my #'s 4 and 14. The foregoing financial data about Rise show no capacity to handle even essential, mine reopening and initial startup expenses and normal operating costs, much less what happens if (as our local resistance expects) the mine operations sooner cease to operate 24/7/365 for 80 plus years. One way or another Rise cannot expect to prevail in perpetual disputes over groundwater, hexavalent chromium, and other issues in courts and political forums over its operations with the thousands of people living on the surface above and around the 2585-acre underground mine (like me) who daily would feel the adverse consequences predicted in out objections and not resolved by the disputed DEIR.

Our losses of real estate values from mine harms and stigma, as well as the other burdens, risks, and problems objected to herein and elsewhere, are not forgivable or tolerable by us surface neighbors. And nowhere does the disputed DEIR deal with the cost and operating effects of such perpetual legal and political conflicts and competitions, even though they should be obvious, because we neighbors have our own legal and political rights to compete against the mine to protect our homes, our groundwater, our environment, our forest and plants, and our quiet enjoyment of our community without such mining. See, eg, my #'s 3.N, 3.D, 3.F, 4, 7, and 14, explaining how our local surface owners expect eventually to compete with hundreds of our own new wells to preserve our property, forest, and human water needs in the coming climate/dryness/drought stressed environment without allowing dewatering water waste by the mine sending our groundwater somewhere else

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downriver in Wolf Creek in reliance on a disputed DEIR "recharge" or "balancing" fantasy that the nonpredictive, past average rain between 1967 and 2017 predicts our rain in the next 80-years. See, eg, my # 3. D, F, and M and 5.

B. Rise, A Functionally Canadian Operation, Can Be Expected To Export Any Mining Profits to "Foreign" Investors, Adding No Net Benefit To Us Locals Or Our Community (See My #'s 2 and 4).

For functional and strategic purposes, this is a Vancouver, Canada, enterprise, incorporated in Nevada, but with a Vancouver headquarters where its officers and most of its directors are located. There is no reason to imagine that any of the profits exported to Canada or elsewhere will have any local benefit here. Therefore, as addressed in my # 4, the calculation of any alleged "net benefit" from the DEIR mine must depend on comparing the many harms, risks, and dispute costs to come against only what the mine operation spends locally, including on a small number of local employees (compared to the thousands of resolute and continuous opposition locals, like me, living above and around the surface of the 2585-acre underground mine.) When I describe herein those taking the profits as "foreign investors" (see below), that is what I reference as outsiders, even if some US parties somewhere else in the US acquire some stock and profits. The point is that the profits cannot be fairly counted as a local benefit to our economy here. For example, the 10K financials at 75-77 discuss shareholders, and many are Canadians or other non-US investors. There are some US listed investors like EMA GARP Fund LLP of Wellesley, Mass., but there is no stated or otherwise apparent reason to imagine significant profits returning to our community, if there ever are any profits. That is why I believe my shorthand reference to exporting mine profits to "foreign investor" or Rise as a "foreign" enterprise is appropriate for the risk/benefit analysis. As explained in my # 4, that means there is little but downside here from this mine, and any meaningful upside would benefit outsiders who do not suffer from the things to which us locals object.

C. Our Government Decisionmakers Should Do Advance Due Diligence on Both the Initial And Any Ultimate Persons in Control Of the Mine.

Under the circumstances described above and the risk of a "change in control transaction" to someone even less desirable and suitable for our local comfort, the credibility and track record of the relevant miner players are essential to any responsible evaluation of the disputed DEIR. See my # 14. Stated another way, any approval of the DEIR or mine is premature at best until Rise either (1) demonstrates publicly its capacity to afford to perform and comply with applicable laws and accomplish even the insufficient promises and safety/environmental goals in the DEIR (ie, overcomes its disturbing admissions in its current and past 10K and 10Q filings and what it admits about infeasibility in DEIR 6-14), and (2) reveals who is going to fund and control the mining and such attempted mitigations, compliance, and performance, once the errors, omissions, and deficiencies in the disputed DEIR are addressed with more requirements consistent with applicable laws both now and in the future, when us aroused local voters organize for that enhanced protection of our community. See my #'s 3.N and 14.

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That should also be true as to the answers to my hard questions not answered by the DEIR, such as those I ask at my # 15 and elsewhere throughout this Objection.

Although I know and suggest nothing about the merits of such matters or Rise or its people beyond the record data mentioned in this Objection, I note that the Rise Form 10K at pages 69-70 describes certain "Involvement in Certain Legal Proceedings" as to an officer and Banks Island Gold Ltd. involving a 2016 bankruptcy matter, and charges of environmental violations in Canadian mining. Track records are especially important to investigate with mining companies, since historically it's an "aggressive" industry, which by its nature is often about removing value from a local community and leaving a worthless (or worse) mine behind. See my # 4, describing no net benefit from this mine to our local community. If there is any doubt about the importance of responsible mining versus unsatisfactory, historical industry practices, I also suggest that the due diligence include communications with the communities around the more than 40,000 abandoned California mines on the EPA list, such as asking those communities whether, if they had it to do over again, they would resist the mine with everything they have. The answer should surprise no one. Many mines leave neighbors disappointed or worse. See my # 1, where I describe my experiences dealing with liquidating or restructuring insurance or surety companies who regretted issuing insurance or surety bonds to miners.

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3. Some Key DEIR Admissions And Telling Errors, Omissions, And Worse To Lay The Foundation For Specific Objections And Continuing Concerns Beyond the Disputed DEIR.

A. Some Key DEIR Admissions, Omissions, And Deficiencies That Fail Either To Comply with CEQA Or To Analyze the Burdens, Risks, And Problems That Concern Us Locals Living On The Surface Above And Around the 2585-Acre Underground Mine, Generally Deficiently Addressed by the DEIR As If That Underground Threat Were Incidental, Rather the Core of the Legal And Political Disputes To Come

I. Introductory Statements That Contrast What Is Admitted In the Disputed DEIR In Comparison To What Is Omitted, Misdescribed, Or Worse.

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There is grossly insufficient correct and credible DEIR information regarding the 2585-acre underground part of the mine and its operation and effects, as if somehow the DEIR could ignore that part of this CEQA mining "project" beyond the surface owned boundary of the disputed DEIR's so-called "project" at the Brunswick Industrial Site and 30 or so wells along East Bennett Road or at the Centennial Industrial Site (which is claimed to be separate in the DEIR, but is not.) What DEIR information does exist about that 2585-acre underground mine is scattered in pieces throughout the thousands of pages of the DEIR and cross-referenced materials in ways that are not only unhelpful, but often seem grossly deficient, incomplete, misleading, and contrary to CEQA. See my # 14 and my supplemental brief. That

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is especially true for thousands of us who own or use the surface either above or around that 2585-acre underground mine or live in either the larger "impact zone" or the much larger 'stigma zone' where our groundwater, air quality, and other environmental concerns are at risk as well as our real estate values from that one CEQA project, especially the 2585-acre underground area beneath or near us. Indeed, a casual DEIR reader would incorrectly assume that the DEIR was merely mining below owned surface property, rather than 2585-acres underground beneath or near some unsuspecting homeowner. See the underground mining description in the current Rise 10K discussed in my # 2, which provides better, but still insufficient, data than the DEIR. Is that why the DEIR incorrectly describes us locals as if we were somehow expendable "rural" homeowners, as distinguished from what the law and normal people would consider our normal our suburban housing we own above and around that 2585-acre underground mine taking shared groundwater in which we also have ownership? (As far as I am concerned, no mine victim is expendable wherever they live, and the DEIR trying disproportionately to harm some for the benefit of the many without constitutionally required compensation has been prohibited by the California Supreme Court, as I explain in my # 4.A.)

II. Some Key Illustrations of Mining Disputes, Water Depletion And Quality, Toxic Substances (eg, Hexavalent Chromium, Asbestos, Arsenic, Etc), Air Quality, And Related Issues, Including Financial Feasibility.

Consider the following illustrations of fact (largely from DEIR # 4.8, with selected supplements) that are admitted in various places in the disputed DEIR regarding the 2585-acre underground mine, beginning with water supply, toxic hazards, air quality, and related issues:

(a). Some Basic Mine Data And Illustrative, Related DEIR Errors, Omissions, And Deficiencies, Including Failure Adequately To Disclose the Surface Locations Above the 2585-Acre Underground Mine.

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The underground mine 'mineral rights boundary' is described as "approximately **2585 acres** [emphasis added] and generally contains properties surrounding the Brunswick and Centennial Industrial Sites, with the majority of additional land area located north ... and east ... includ[ing] most of the Nevada County Airport and surrounding Air Park, as well as property along both sides of Brunswick Road, Greenhorn Road, and Idaho Maryland Road." DEIR at 2-1 and in various uninformative DEIR maps that do not allow us thousands of local residents and voters above and around that mine to know what underground mining and groundwater depletion is occurring below or near us. (While a better description than the DEIR is discussed below in my # 2 from the Rise SEC Form 10K, that is still insufficient.) **Rise and the DEIR have apparently made no effort to warn such local residents of what is mining planned beneath them, and the DEIR ignores many of the related risks, problems, and disputes the DEIR would be triggering there. In other words, the disputed DEIR contemplates largely deficiently analyzed or explained blasting, tunneling, digging, removing rock, dewatering, and other mining activities directly underneath or near and below thousands of local residents' (and**

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voters') homes and businesses, all of whom as surface owners have competing legal and political rights that the DEIR generally ignores. For example, us surface residents' rights include protection from subsidence by a right to subjacent and lateral support, as well as to competing access to use our own groundwater in competition with the DEIR miner, who would be dewatering beneath them 24/7/365 for 80 years and possibly drying our surface land without any adequate CEQA or environmental discussion. See, eg, my #'s 3.D, E, F, and M and 5. (The DEIR's disputed assumptions are insufficient, as discussed in my #'s 3.M and F.) It does not take an expert to notice how many trees in our local forests are already dying and creating fire hazards as our soil dries out from climate change. The DEIR groundwater depletion (without the DEIR's incorrectly assumed "recharge" or "balancing") that is disputed below and elsewhere in this and other objections increases such threats to our homes and environments both from fires and fire smoke. See my # 11.

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Why does the DEIR not address these risks in any meaningful way? Indeed, why does the DEIR not address the many similar and other risks and harms to those of us in the bigger area around that 2585-acres of underground mining and even those locals in the bigger "stigma zone" around that our impact area (measured, for example, by the decline in our real estate values, either when we tell our buyers about the real mining problems and risks so close beneath or near to them, or when a buyer finds the appraiser for the mortgage lender reacting badly to that reality and stigma)? Stated another way, what informed resident or user of the surface above or around the 2585-acre underground mine will trust their human or property's fates to this disputed DEIR or its advocates, especially considering the admitted, problematic financial condition of Rise described in my # 2, which my # 14 proves is relevant, among other things, because no disputed DEIR promises, assumptions or mitigations have any credence or compliance with CEQA or other applicable laws, if the miner lacks the funding to accomplish them timely. Illusory words do not satisfy CEQA. See my # 14.

What makes such strategic omissions by the disputed DEIR so frustrating to us locals at risk to such 2585-acre underground mining beneath and around us is that, **while still insufficient, the Rise Form 10K for the fiscal year ending July 31, 2021, provides more useful operational data about the mine than does the DEIR. For example, the 10K at 18-21 discusses "Mineral Rights" with data not revealed in the disputed and insufficient DEIR discussions of the underground mine.** For instance, below and elsewhere I criticize the DEIR for providing little or no meaningful information about surface owner and user rights above and around the 2585-acre underground mine. We locals do not even how to know what surface land is affected, because there is no sufficient surface location detail in the DEIR, and DEIR areal maps are useless for the kind of data us competing surface owners and users need to find our properties versus that 2585-acre mine. For example, the only incidental DEIR description I saw of the area where surface owners and users have *DEIR mining* below them is a dotted line on an aerial photo at Figure 3-2 where trees hide all landmarks, which is utterly unhelpful and uninformative for those of us at risk. The other location maps are even less helpful or useful to those at risk, as is Table 3-2.

Among the many such problems is that the disputed DEIR addresses the "project" as if were just the 175.64 acre Brunswick Industrial Site plus 30 well properties along East Bennett Road (incorrectly treating the Centennial site as a separate project), rather than the legally mandated and more practically relevant 2585-acres of underground mine where Rise admits

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that it does not own (and cannot use) the surface and the first 200 feet down. See my # 2. Thus, DEIR Table 3-2 is incorrect and misleading, as it does not address the vast number of normal residential homes (including many of us above the DEIR mine on Banner Mountain) above and around the 2585-acre underground mine. We need to know (and can't yet tell) if disputed DEIR mining is under our surface land, or whether we are adjacent to and above the underground mining in either the "impact zone" or the "stigma zone," where, for example, our legal rights may be more about our shared groundwater rights and the miner's obligations of subjacent and lateral support. See my # 4. (Of course, if the metaphor of the old musical play and Clint Eastwood movie, *Paint Your Wagon,* about Nevada City mining, becomes prophecy, and our whole area collapses into the mine hole for lack of subjacent and lateral support, even those in the stigma zone may end up having both subjacent and lateral support claims.)

(b) Legal Underground Mining Details Omitted In The Disputed DEIR, But Admitted In The Rise SEC Form 10K.

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However, while missing from the DEIR, we learn in Rise Gold Corp's SEC 10K at 18-19, for example, that: "The I-M Mine Property consists of mineral rights on 10 parcels, including 55 sub parcels, totaling 2800 acres ... of full or partial interest, as detailed in Table 2 and displayed in Figure 4." [While still insufficient for matching the surface streets and legal descriptions to the underground mine, those SEC 10K maps are better than anything in the disputed DEIR. Incidentally, notice how that quote said, "full **or partial** interest...," a topic for intense follow up investigations. Is the DEIR omitted discussion of sharing mining rights?] The miner's 10K also describes the deed language and terms and exclusions of the mineral rights that limit Rise mining rights and offer surface owners protections ignored in the DEIR. **For example, the 10K at 19 defined the location of those mineral rights to include "all rights to minerals within, on, and under the land located in portions of Sections 23, 24, 25, 26, and 36 in Township 16 North-Range 8 East MDM, Sections 19, 29, 30, and 31 in Township 16 North-Range 9 East MDM, and Section 6 in Township 15 North-Range 9 East MDM and all other mineral rights associated with the Idaho-Maryland Mine." See Figure 4, the Form 10K map that is more useful than the incomprehensibly vague maps in the DEIR.** While everyone living in or around those surface land "Sections" will now have most cause for alarm, that data will also scare everyone in the adjacent sections (like me in my "Section 20" home), who may suffer from some direct and indirect harms, risks, and stigmas (eg, groundwater and real estate value losses). However, all of us locals share some direct impact from risks to our groundwater losses, air pollution, hexavalent chromium and other mine toxins, and various other impacts and stigmas. See, eg, my #'s 3 - 14.

Those DEIR mineral rights only begin (as separated from our surface rights) at 200 feet, significantly complicating the DEIR mine's exposures in coming legal and political disputes and groundwater and other competitions, for example, over our surface owner subjacent and lateral support and other surface rights. (For instance, "subsidence" from lack of subjacent and lateral support may include our such 200 feet of "surface.") As so stated in the miner's SEC 10K at page 19: "Mineral rights are severed from surface rights at a depth of 200 ft (61m) below the surface, with all mineral rights being contiguous below 200 ft (61m) of surface." What that means is that there are 200 feet of surface protection rights entitled not

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to be entered, disturbed, or exploited without the surface owners' consent. (Note, when dewatering the mine drops the water level, that may drop the 200 feet surface, because they're lowering the surface by "subsidence," breaking surface infrastructure and improvements and other harms as already commonly seen everywhere in the Central Valley, Bakersfield, etc, where desperate groundwater pumping is doing exactly such subsidence harms.) Why did the disputed DEIR not address the predictable complications, obstacles, and risks associated with us objecting surface owners above and around their underground mine, such as when we exercise our own legal property and groundwater rights down 200 feet for many purposes and even deeper as to everything besides "minerals?" (Our groundwater is not a "mineral" subject to Rise's mineral deed.)

For example, what happens when the mine dewatering lowers our water table and surface in that first 200 feet to harm our already climate stressed, surface forests and other plants, or when the mining drains existing and future wells there and breaks our surface infrastructure and improvements as the surface "subsides" and changes? What happens when local land near but outside the 2585-acre underground mining boundary begin to sink collective wells even deeper than the mining? (Because of expense, there may be several collective and deeper new wells.) That competition raises some interesting legal and political questions about the scope of nuisance, trespass, conversion, and other torts, and well, as to the extent government becomes involved, inverse condemnation. See my # 4. And again, there will now always be the hexavalent chromium/Erin Brockovich movie disputes this DEIR project cannot ever defeat or escape. See my #'s 3.C, G, and H and 7.

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In any event, for the purposes of the DEIR, these issues include many of the kinds of practical environmental issues, such as the threat to lowering our water table to harming our private, surface forests and plants by depleting our groundwater (since most of us regard the disputed DEIR "recharge" and "balancing" claims as a sad fantasy or worse and, the DEIR's disputed "happy talk" about sending our local groundwater downriver somewhere else in the Wolf Creek to NID is a strategic distraction, because that does nothing to help us locals losing that groundwater in which we own rights). That groundwater depletion also creates massive new fire and fire smoke threats, adding more wildfire smoke ignored in the DEIR mine's air pollution analysis. See, eg, my #'s 3.D, F, and M, 5, 10, and 11. Again, if the mine DEIR has answers for such obvious questions, issues, and concerns, why does the DEIR not address them appropriately, as required by CEQA and other applicable rules? See my # 14. Whatever excuse the DEIR advocates may attempt, such omissions do not seem to be from ignorance or oversight, and, as discussed in my # 2, the DEIR miner shows no financial capacity to compensate its victims (or even to perform its DEIR promises), because the miner admitted some of this in their current 10K filing with the SEC, the lack of any gold value data that would support lending or investing except on a highly speculative basis, such as:

> As of the date of these consolidated financial statements [7/31/21], the Company has not established any prove or probable reserves on its mineral properties and has incurred only acquisition and exploration costs. (10K at 6)
>
> ***

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> No estimates of mineral resources have been prepared for the I-M Mine Property. We are not treating historical mineral resource estimated as a current mineral resource estimate. In addition, there are no mineral reserves estimates for the I-M Mine Project. (10K at 34)

When the DEIR addresses alternative to the mining operating plan at DEIR # 6, it admits the following (at 6-14) in a discussion about why reducing its 24/7/365 operating plan to a normal 12-hour day is not feasible: "Capital and operating costs would increase substantially and likely make the project economically infeasible." That proves how fragile the operating margins of this mine are expected to be, and the financial data about Rise exposed at # 2 herein shows no capacity of this miner to handle even essential, mine reopening startup expenses and normal operating costs, much less mitigations and what happens if the mine operations cease to operate 24/7/365 for 80 plus years, as the surface owners dispute and compete perpetually over groundwater and other issues in courts and political forums.

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There is no alternative but resistance for the thousands of us people living on the surface above and around the 2585-acre underground mine, who would daily feel the consequences and impacts of what's happening below or near us. The loss of real estate values from mine stigma, as well as the other burdens, risks, and problems objected to in this and other objections, are not acceptable or forgivable by us surface neighbors. Also, nowhere does the disputed DEIR deal with the cost and operating effects of such perpetual legal and political conflicts with us surface owners and neighbors, even though we should be obvious, because, as discussed in my #'s 3.N and 8, we surface neighbors have our own competing legal and political rights against the mine to protect our homes, our groundwater, our forest and plants, our environment, and our quiet enjoyment of our community without such mining.

Also, note that the Rise SEC Form 10K at p. 6 states: "As of the date of these consolidated financial statements [7/31/21], the Company has not established any prove or probable reserves on its mineral properties and has incurred only acquisition and exploration costs." That lack of any gold value data prevents lending or investing except on a highly speculative basis. That credit and investment risk becomes clearer in other statements, such as those above. **What all that means is that, until the mine is dewatered and prepared for DEIR operation, so that at least the ancient pre-1956 closure data can be updated, the creditworthiness of Rise for raising money is limited to speculators. That makes the credibility of the DEIR's wishful thinking about sufficient money magically appearing in time seems even more of a fantasy. Even mining speculators are used to betting against some data about proven or probable reserves, and it appears what this DEIR miner may discover next in its new, expanded, and deeper areas of the 2585-acre mine is an even greater mystery.**

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B. Some Illustrations of Specific Such DEIR Errors, Omissions, And Deficiencies In That Context.

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In a distant place inside the massive (but often useless) DEIR (at 4.8-17), the DEIR admits that: The Idaho-Maryland Mine encompasses a system of underground tunnels, many raises, numerous winzes, four inclined shafts, and two vertical shafts" for an "estimated equivalent of 72.8 miles ... of underground tunnel ... assuming typical drift dimensions of 7.5 feet x 8.5 feet." See also more data in DEIR at 4.7-2. However, the point of the new mining is to expand and create more and deeper underground depletions of rock (and groundwater) by blasting and removal 24/7/365 for 80 years with more continuous dewatering along those new tunnels and digs. Where does the DEIR discuss the details of that new mining or the funding feasibility and consequences of that future work and promised mitigation? Describing the past before the 1956 closure and flooding is not only incorrect and misleading as to the risks of future problems from drought, climate change, etc, but also, we know DEIR described mining activities are themselves intended to change many burdens, risks, and exposures underground in ways that are not adequately explained or addressed in the DEIR. See, eg, my #'s 3.E, F, and M. To a casual reader, the DEIR would reveal no clear idea how much more would be at risk of burdens, harms, and problems in the future, especially because the DEIR incorrectly assumes our groundwater "recharge" and "balancing" from dewatering based on the old mine and historical data that is already irrelevant and nonpredictive and soon will become even more so. See, eg, my #'s 3. D, E, M and 5.

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Note that the DEIR predicts (at 3-19) in 24/7/365 mining there would be "approximately 500 tons per day (182,500 tons per year) of barren rock" removal below "500 feet of the ground surface." Alert: The Rise Form 10K filing with the SEC at page 6 states: The Use Permit application proposes underground mining to recommence at an average throughput of 1000 tons per day." Also, in stating the "Project Objectives" at DEIR page 6-2, it states the goal to be to: "Construct a commercially viable, financeable, major underground gold mine operation that will produce 1000 tons per day (365,000 tons per year) of gold mineralization." Which number 500 or 1000 is correct? (At the March 24 hearing the DEIR advocate said 1000 tons a day.) What are the consequences of one of those numbers being a material misrepresentation, either to the SEC and investors or to our government officials considering the DEIR? The effects of that mining and dewatering cannot be satisfactorily deduced from history as the DEIR attempts to do (see my # 3.M), including as illustrated in what follows below:

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(i) Such a DEIR focus on narrow admitted financial margins for operations (see at 6-14) may explain the DEIR resistance to not only to reducing such 24/7/354 operations (where a normal 12-hour day is considered economically infeasible at 6-13. See my #'s 2 and 13), but where the DEIR even resists reducing 24-hour truck service in a disputed section at 6-14, where it states the need for: "an average of 50 trucks per day ... 3 trucks per hour ... with a maximum of 100 trucks a day" every day." As discussed in many objections and included in the "no net benefit" from the mine analysis in my # 4, such heavy trucking will prematurely degrade the roads and infrastructure not made for such abuse. Where does the DEIR satisfactorily address the direct and indirect cost of constant road and infrastructure repair, or how key major local roads will frequently be repeatedly dysfunctional during repairs (eg, single lane only) for extended periods? Not where one would expect in DEIR 4.12. See my #'s 8 and 9.

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(ii) Besides the disputed DEIR ignoring the reality that we can no longer judge the future from the past (see, eg, my # 3.M), the DEIR makes an even wilder, disputed, and

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unproven assumption/guess that mining problems of concern here become less the deeper one mines. Nowhere is that unsubstantiated DEIR assumption proven, and us locals should not have to rely only on such DEIR faulty, so-called logic applied to such admittedly unknown conditions for new, expanded, and deeper mining of unexplored and unanalyzed parts of the 2585-acre underground mine closed and flooded since 1956. Consider this disputed DEIR assurance (at 4.8-51) on which us locals are asked to risk our surface homes and future (for a no net benefit mine from which Rise would export profits, as discussed in my # 4):

> "The proposed mining areas would primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at greater depths, typically more than 1,000 feet below the surface and deeper. At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, due primarily to the lack of open fractures because of the large pressures exerted by the overlying rock mass (ie, the lithostatic pressure). Given that the new mining activity would occur at equivalent or greater depths than the proposed [sic?] mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater in the domestic supply wells that are completed at much shallower depths."

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This is subject to many disputes I discuss at my #'s 3.D and F, 5, and 6. I note here, however, that there is no supporting discussion of the effect of such deep mining on the actual conditions that may be uncovered at those depths (eg, bigger fractures from blasting, underground rivers, or aquifers?). More importantly, because of drought and climate change, us locals and our governments or other organizations will have to start competing with the mine for groundwater at ever depths during the 80 plus years of this mining. See my #'s 3.D, F, and N, 5, and 6. Also, recall that the mine has been closed and flooded since 1956, and without access or reliable and sufficient records, how can the DEIR even guess about the stating state of the mine? and

(iii) Note that the DEIR admits (at 4.7-2) that: "The mine has been inactive since closure in 1956 and was inactive for several periods during the 1866 to 1956 production period. *** ...the project sites appear on several lists of hazardous materials sites complied pursuant to Government Code Section 65962.5." DEIR at 4.3-56 states: "Ore production through tunneling and long-hole blasting is anticipated to produce 1,000 tons per day (365,000 tons per year) of ore ..." with the 24/7/365 operations discussed elsewhere. See also the beginning of this long paragraph, regarding the 1000 vs 500-ton confusion. As discussed in my # 3.M, there are many flaws in the DEIR trying to predict the either the current or future conditions and issues based on such pre-1956 underground mining data, much less when (as now) the DEIR is seeking approval to mine new, expanded, and deeper areas into the unknown parts of the 2585-acres. What is safe and tolerable for us surface owners and users above the 2585-acre mine with that 24/7/365 blasting and mining beneath us is not a subject that the DEIR ever sufficiently addressed. See my #'s 4 and 14. That is not just noncompliance with CEQA (see my # 14), but it's also another provocation and failure to address the reasonable concerns of thousands of us

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surface owners (see my # 3.N). We don't even yet know yet, who is living where above and around those 2585 acres of mine, because (as discussed above) the obscure aerial photos with dotted boundary lines on treetops do not identify meaningful surface landmarks, and no one has been given proper notice as a surface owner or user.

C. **Admitted (But Obscured) Use of Hazardous Chromium Without Warning Or Analysis. (See more detailed discussion in later subsections G and H below).**

Ind 254-14

Speaking of stigma complications that make our local problems and real estate value losses even worse, the disputed **DEIR admits in its dewatering discussion (at 4.8-42 to 51, especially at 46-49) that it intends to use "underground paste backfill" (ie, material glued with "cemented-paste backfill") that is (incorrectly) described as "environmentally benign" BUT WHICH IS "HEXAVALENT CHROMIUM" OR "Cr+6." See my discussion of more details and my DEIR rebuttals in the subsection below on hazardous substances.** See my #'s 3.G and H and 7. Also, notice that the scattered DEIR discussions of such mining plans often do not even mention, much less analyze, the hexavalent chromium threats or even mention the name, "hexavalent chromium," as if the DEIR parts were written by different mine advocates, ie, one who felt obligated by CEQA to confess the Cr+6 name without any hint of the toxic issues and notorious toxic data and history, and others who chose not to mention either that CR+6 name or the scandals. See, eg, DEIR at 4.3-58 entitled, "Earthwork and Material Handling," ignores this issue; DEIR at 4.3-61 entitled "Health Risk Assessment," **ignores their hexavalent chromium threat entirely and contains an insufficient discussion of the asbestos risks, as well as for the following (at 4.3-62): "Blasting and crushing would also result in emissions of heavy metal. TAC's including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium." But the DEIR relies upon the results of a study of what was found in the old, closed mine in 2020, not what will be now added in the new, expanded, and deeper area mining and not the hexavalent chromium now to be added as mine shoring cement pursuant to the DEIR. Again, in DEIR Mitigation Measure 4.11-7 at 4.11-36-37 they discuss water uses in "cemented paste backfills," including by admitting: "Water is needed to transport and bind the cemented paste backfill underground. ... Backfilling would consume approximately 20,000 gpd assuming a 15 percent water content by mass and 500 tons per pay of backfill placed," but nowhere in that #4.11 discussing hexavalent chromium ingredient or threat at all.** (Incidentally, as noted elsewhere above, sometimes the DEIR seems to talk about this as 1000 tons per day, instead of 500.)

Ind 254-15

Some of the dangerous materials and chemicals admitted existing in the mine are summarized in the DEIR Mitigation Measure 4.8-1(a) at 4.8-52: "The NOI [to the Central Valley Regional Water Quality Control Board under the Limited Threat Discharge permit] shall include evaluation of potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1.2-DCE..." Also, eg, DEIR at 4.8-53+ (and where addressed in my #'s 3.C, G, H, and 7), the DEIR explains how Rise expects to use hexavalent chromium in its CPS plans to (in effect) glue or cement material in the mine as a continuous part of shoring up the old mine and its new, deeper, and expanded mining processes 24/7/365 for 80-years, if they can get away with that over resolute local resistance.

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For those who never saw the movie "*Erin Brockovich*" read Wikipedia's (or other) accounts "Hinkley groundwater contamination," about how a utility allegedly misused that chemical by also dumping wastewater in spreading ponds in Hinkley, California, (now a toxic ghost town) and ultimately had to settle a class action with the local victims for $333 Million (back when that was serious money). The disputed DEIR alerts no one to this threat, apparently attempting without revealing the health issues to minimize any future concern by describing the exposures. Even a minimum Google search of "hexavalent chromium" will reveal even more serious health hazards than the movie. Indeed, the European Union is banning the chemical starting in 2024. See my #'s 3.G and H and 7. Even if government decisionmakers were mistakenly to accommodate Rise in ignoring all the science on the relevant EPA website, that mistake could never survive challenge by us locals and by any more serious, scientific analysis. In any event, the already "significant" stigmas from this mine will now become much worse for our local real estate values (and tourism), when people start talking about the mine area as the "next Hinkley."

Putting aside for the moment that toxic Cr+6 Hinkley problem and stigma, that whole dewatering mess is compounded by the DEIR again incorrectly assuming that the past reliably reveals the future. See my # 3.M. For example, the DEIR admits (at 4.8-51) that:

> "The water ... from the underground workings is anticipated to have similar quality to the water that currently discharges from the existing drains. ... Therefore, the condition after mining is completed would be like existing, or baseline, conditions, such that seeps ...would not represent a potentially significant impact under CEQA [where it just addresses the iron and manganese issues and tries ineffectively to further diminish the appearance of risk by describing how the new mining is going to be deeper]. *** Although the projects proposed water management and treatment, and adherence to permit requirements, would avoid significant impacts to water quality, **the impact is considered significant for the purposes of this analysis and mitigation, specifying requirements for regulatory compliance, is identified as necessary to reduce the impact to less than significant." [But only by ignoring the hexavalent chromium.]**

The DEIR cannot assume that the future will duplicate the past, even if there were compliance and a proper end to mining as the DEIR assumes (but many locals are skeptical for various reasons, including in my case what is discussed in my # 1 from my bankruptcy/cross border bankruptcy, insurance insolvency and other professional experience as to why there are more than 40,000 abandoned and dangerous mines in California according to the EPA website). **Besides the new normal of drought and climate change I discuss, only a fool or worse would assume that you can add Cr+6 and other things to the mining process and blast, dig, tunnel, remove rock, and mine 24/7/365 for 80 plus years and change nothing, especially when there is no adequate analysis of that unknown, new mining conditions underground. Indeed, who else but a wishful thinking miner or worse would imagine that the safety regulations and standards will still be as lax for the next 80 years as they are now? While there is little said about why anyone should rely on the DEIR to clean up the site as promised at the end of the mining process under the circumstances, the DEIR plan will clearly be leaving a flooded mine**

Ind 254-15

full of hexavalent chromium and other unanalyzed, hazardous substances unleashed by that new, expanded and deeper mining, some of which (like CR+6) are not now reported to exist there, and others of which may be more dangerous and in larger qualities than before.

D. An Introduction To DEIR Admitted Water Data, While Also Concealing Massive Unaddressed Issues, Errors, And Omissions And Failing To Reveal The Underlying Assumptions And Artificial Limitations on Which the DEIR Bases Many Flawed Conclusion, Contentions, And Assumptions We Dispute.

Among the most serious DEIR deficiencies is the failure not only to identify and address the real water issues, but, contrary to CEQA as explained in my # 14, to scatter the often-conflicting water and related data in hard to reconcile ways in many different sections of the DEIR without reconciling links and often without common usage of terms or data for clarity. Any serious reader comes away from reading one DEIR water discussion by saying "yes, but what about what you said back there?" Compare the location of various water related admissions that I quote and dispute in this Objection (eg, my #'s 3. A, B, D, E, F, and M, 5, 6, and 13). Government decisionmakers must begin to understand that, whether it is intentional or not, the mine advocates could not have made any understanding of the DEIR water issues any more difficult if they tried to do so as a tactic. See my # 14 and court precedents discussed there like, *Banning, Vineyards, and Concerned Citizens.* See also the related DEIR confusion over many places where toxic hexavalent chromium needed to be disclosed and addressed but was rarely named and never identified as a risk, in my #'s 3.C, G, H, and 7.

Ind 254-16

Just consider this critical example, by studying pages 4.11-35 to 52 in the DEIR's "Public Services And Utilities" # 4.11 (where, in discussing NID water supply issues, they approach some realities more realistically, although deficiently), we discover more revelations than in the frustrating and intensely disputed 83 page discussion in "Hydrology And Water Quality" # 4.8 (where there again is no apparent attempt to reconcile that mine data with that NID discussion or even with other conflicting and disputed water discussions in many other DEIR sections mentioning water issues. See my # 14.) Among the interesting credibility challenges against the DEIR in this process is the following [slightly annotated by me in brackets to expose the DEIR's apparent "bait and switch" game] quote at 4.11-39 to 43 from a subsection of that "Public Services And Utilities" section called "Projected Water Supplies," where the DEIR admits some of my Objections in conflict with its other DEIR claims and goals where one would expect to read them. (Who knows what the DEIR's reconciled position may be, because they never sufficiently reconcile their admissions to their disputed claims we cite with any clarity about their purported factual basis, because most of the disputed DEIR positions seem to be sufficiently unsubstantiated except by underlying DEIR assumptions for its disputed projections either don't exist or are apparently buried in some unspecified places in the separate, lengthy reference materials the DEIR selected and lists by general and uninformative reference in supported support its disputed DEIR conclusions or assumptions. See my # 14 and court precedents discussed there, like, *Banning, Vineyards, and Concerned Citizens.*



By way of illustration, the DEIR approach too often is the equivalent of my saying (as I do) that hexavalent chromium is an intolerable threat to our community with a general reference to the EPA website and to the thousands of negative studies and reports available in a simple Google search. However, I am not the one with the burden of complying with CEQA: the DEIR proponents are. Consider the following water related data:

Projected Water Supplies. Table 4.11-5 provides a summary of the District's projected supply entitlements [through 2040]. **[The relevance for this Objection in the following quotes lies in the unaddressed conflicts among NID's analysis of surface water supplies, since NID does not use groundwater, as discussed elsewhere. The DEIR's intensely disputed and, frankly, absurd, groundwater "recharge" and "balancing" assumptions ignore climate change and credible science in order elsewhere in the DEIR to predict the future from the average rainfall between 1967 and 2017, instead of the "new normal" used by responsible scientists, governments, and businesses to predict a chronically drier and drought harmed future.]**

Ind 254-17

Water Code section 10910(c)(4) requires that a WSA **[Water Supply Assessment, on which the DEIR mistakenly relies in cites throughout its disputed DEIR text regarding water and, therefore, misapplies the NID's different standards than CEQA and other relevant laws to this mine's imagined and disputed ability to recharge the ground water the mine depletes and sends somewhere else downriver.]** include a discussion with regard to "whether total projected water supplies, determined to be available by the city or county for the project, in addition to existing and planned water demand associated with the proposed project...." Accordingly, the WSA addresses these three hydrological conditions through the year 2040 ... in Table 4.11-6. [The DEIR then purports to "summarize" "projected availability" from the District's existing and planned future supplies THAT DO NOT INCLUDE GROUNDWATER OR ACCURATELY ADDRESS THE MINE'S LOCAL GROUNDWATER DEPLETION AND RECHARGE, but instead focus on] ... the District's projected water demands in normal, single dry and multiple dry years throughout buildout. **[As elsewhere, this compares "apples to oranges" since it is focused on the NID general service area demands from NID's surface water sources to rain recharging the massive groundwater depletion in one local area above and around the 2585-acre underground mine from 24/7/365 dewatering for 80 years, not the 20 years NID uses for different purposes.]** As shown, demand within NID's service area is expected to exceed the District's supplies from 2025 to 2040 during Single Dry Years and in the first and second years of a Multiple Dry Year period from 2025 to 2040. **[This is confusing since this DEIR paragraph at 4.11-39 begins with a "20-year projection" and shifts to the 15-year period "from 2025 to 2040." Throughout this Objection I make reference to the DEIR's lethal flaw of limiting its perspective to this 2040 or 20-year cut off, as if somehow the DEIR were entitled either to ignore the last 60 or 65 years of its 80-year mining binge or, worse, perhaps incorrectly and without any evidence to assume that the whole 80 year period matches the first disputed 15 or 20 year flawed and misleading projections (or that what follows 2040 will be the same as what preceded 2040). For convenience and simplicity, I often just say "20 years" to**

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avoid addressing this complexity and confusion every time. Since 20 years is better for the DEIR's disputed theory than 15 years, the DEIR advocates should not complain (but somehow, I expect they will anyway.]

Factors contributing to inconsistency in NID's water supplies include legal limitations due to water rights and contracts limiting the quantity of water available to the District, environmental constraints, and reductions in availability due to climatic factors. The surface water supply to NID is subject to reductions during single and multiple dry years (seasonal and climatic shortages). ... **[These same kind of limitations apply with equal and often greater force to the existing and future competition for groundwater above and around the 2585-acre underground mine by locals like me, as demonstrated elsewhere in this and other Objections (see my #'s 3.E, F and M and 5), but the DEIR inconsistently ignores any discussion of our groundwater rights' disputes and mine limits, except for a distracting and disputed discussion of the 30 or so wells along East Bennett Road. Since the DEIR recognizes some of these factors here (with even a rare mention of "climate"), why not address these matters where readers would expect them? The answer to that may be that the mine advocates recognize that, once informed adequately of the DEIR's real water burdens, risks, and harms, DEIR or mine approval would trigger competition and legal and political disputes with us locals over groundwater (and, during expected shortages, NID surface water) as to which we have at least equal, if not superior, rights.]**

Ind 254-17

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Water Supply Sufficiency. Pursuant to Water Code section 10910(c)(4) and based on the technical analyses describe in the WSA prepared for the proposed project, the total projected water supplies determined to be available for the proposed project during Normal water years during a **15-year projection** would meet the projected water demand associated with the proposed project. (emphasis added) **[Again, this incorrect general conclusion appears to be a "bait and switch" as above, since that WSA etc analysis is focused on NID general supplies from surface water; and not on the disputed recharge or "balancing" imagined in the DEIR to our local groundwater from mine depletion from dewatering 24/7/365 for 80 years during a time when the old "normal" of the DEIR (eg, average rainfall between 1967 and 2017) no longer exists in the "new normal" of climate change, unprecedented dryness and drought, and greater competition from us locals accessing their own groundwater rights with new or deeper wells from above and around the 2585-acre underground mine. While we also dispute the sufficiency of NID supplies to the mine for no net benefit to the community (eg, my # 4), as described elsewhere here, the above discussion and others in this Objection demonstrate the errors, omissions, and deficiencies in this DEIR.]** ... Therefore, [with the DEIR incorrectly referring to NID's "projected 2040 water demands" as to the 30 East Bennett Drive property connections, as if that were the only DEIR 2585-acre underground project impact, a claim contrary to many parts of the DEIR I address] NID would be able to serve the proposed project in addition to existing and

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planned developments with some reliance on demand reductions in dry years by 2025. **[This erroneous and unsupportable conclusion is contrary to the DEIR itself, although it seems to admit that even the portion of the water use admitted here is admitted requiring "some reliance of demand reductions in dry years by 2025," which means that applying better information with a more scientific, fair, and appropriate analysis would reveal bigger shortages.]**

Ind 254-19

[Besides what DEIR calls a Normal Year, Table 4.11-5 admits at 4.11-40:] "Potential Surplus (Deficit)" [for] "Single Dry Years" [of progressively increasing deficits from 2025 to 2040 in acre feet/year] [for] "Single Dry Years" [ranging from] [negative] 85,629"/"48%" "Percent Shortfall of Demand" to "-98,814"/"52%" "Percent Shortfall of Demand", [as well as more deficient years for Multiple Dry Years]. ... [DEIR quote continuing at 4.11-42] Water demand within NID's service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period. **[That ignores many realities of increased DEIR water use, because, instead of 30 wells along East Bennett Road, the reality will be hundreds of our locals' competing wells just in the areas above and around the 2585-acre mine as we locals combat climate change and drought as well as the mine's groundwater depletion, as I explain elsewhere. See, eg, my #' 3.E, F, and M and 5. If the DEIR advocates or NID imagine that they can stop that our competition with our new or deeper wells, a common response to chronic drought which has occurred already all over the state where water supplies are already insufficient, then they do not appreciate the political and legal ferocity of such locals defending their homes, their forests and environment, and their community way of life from the no net benefit mine's massive depletion and disposal downstream and other waste of our shared groundwater. See my # 3.N discussing how us thousands of local voters can reform the laws and change officials to accomplish our worthy defenses, even independent of other legal remedies. The indisputable reality is that few, if any, of us thousands of affected locals will be willing to sacrifice anything for the benefit of this undesirable mine. See my # 4.]** However, this project is not expected to exacerbate NID's water supply shortages during dry years and the project will supply water into the South Fork Wolf Creek and into the NID conveyance system, at volumes exceeding the project water demand for potable water from NID. **[Even if that were true, which we dispute, it means little to those of us living above and around the 2585-acre mine who are losing our groundwater to that mine dewatering waste for someone else downstream. Moreover, on the merits, why would NID allow its system to be polluted by mine water from Wolf Creek that, even if correctly treated without human error or storms (which treatment quality many would decline to trust to this DEIR for 24/7/365 quality for 80 years, when it comes to their families' health and the use and value of their homes), no one wants even to accept even the level of hexavalent chromium and other mine water toxins that some industry influenced bureaucrat standards official may consider tolerable.]**

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*** This project would be subject to any applicable water demand cutbacks during droughts, like other NID potable water customers who are served by NID. **[However, the DEIR mine project can then be also expected to increase NID customer demand in years when their wells have deficient supplies, and none of that predictable defensive conduct is addressed in the DEIR or by NID, perhaps in the case of NID, because the managers do not expect the coming policy changes from us local voters to assure that they do not suffer from water wasters like this mine. See my # 3.N. The future will increasingly become what some politely call "competitive," but what (more accurately) is about us thousands of local voting residents insisting on our legal and political rights to our priority share of surface and ground water over less beneficial uses, especially no net benefit uses like the mine. See my #'s 3.N and 4.]**

*** (DEIR quote at 4.11-43) Thus, **a less-than-significant** impact would occur**. [That incorrect and disputed DEIR conclusion does not follow from the analysis that is rebutted above and elsewhere in this Objection and others. Please note, however, that the rest of the DEIR states that the economics of the mine (like the miner itself admits in its SEC Form 10K and 10Q) are so fragile that anything less than continuous 24/7/365 operations for 80 years creates significant operational and environmental problems. See, eg, my #'s 2 and 13. Such admitted water problems are inconsistent with those disputed claims, as addressed in my rebuttal to the DEIR's "Alternative's Analysis" discussion (at #6) I address near the end of this Objection at my # 13.]**

Ind 254-19

Part of the reason for the error, omission, deficiencies, and worse address in the prior long quoted and annotated paragraphs relates to compounded mistakes and worse in the disputed DEIR's preceding discussion (DEIR 4.11-7 at 4.11-35 to 38) entitled, "Project Water Demand," which distinguishes (unlike most of the DEIR) between "Potable Water Demand" and "Non-Potable Water Demand." That roughly correlates to surface water from NID versus groundwater. Those disputed DEIR discussions are summarized at Table 4.11-3 (at 4.11-38) stating "Total Groundwater Consumption for Non-Potable Water Use" of "84,000 gallons per day"/94.1 acre-feet per year" and "Total Water Use" of "107,600 gallons per day"/"120.5 acre-feet per year." However, scattered in discussions in DEIR 4.11-35 and 36 are also various other NID water uses at the mine project, such as: (i) "5700 gallons per day" for Brunswick Industrial site building uses, (ii) "17,900 gpd" for replacing groundwater from 30 wells on East Bennett Road, and (iii) "42,000 gpd" for dust suppression and compaction for five years at the Centennial Industrial Site (which is not really a separate CEQA project, as the disputed DEIR incorrectly claims). Instead of a comprehensive total use, the DEIR has scattered that water usage data by types of use, apparently hoping that critics cannot add [5700, plus 17,900, plus 42,000 equals 65.600 gallons per day]. Thus, the disputed DEIR states debatable aggregated service area numbers on that same page in Table 4.11-4, entitled, "Projected NID Service Total Water Demands with Project (ac-ft/yr)" of "Total Water Demand," progressing increasingly from 161,678 in 2020, to between 174,763 to 217,951 in 2040. But also note other mine water uses mentioned below in the next subsection, such as "Water Vapor in Ventilators" (40,000 gpd), "Cemented Paste Backfill" (with toxic hexavalent chromium, 20,000 gpd), "Gold Concentrate & Engineered Fill" (24,000 gpd) [another 84,000 gpd for those three], plus the 1,224,000 gpd or 850 gpm for dewatering the mine. **[By comparison, and as a reality check on**

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the resolute political and meritorious legal defense activities that this no net benefit mine related water competition and waste will inspire from us locals competing for our share of NID and ground water above and around the 2585-acre mine, consider this example. The most strict and painful governmental drought water restriction I have suffered since I moved to California in 1972 was a 50-gallons a person a day limit, and that happened in part because some of my local East Bay MUD water was reallocated to much drier Marin County. As political policy people, consider now how you would propose to deal with such a 50 gallon a day limit on human use, while this no benefit mine still uses some large part of its admitted 84,000 gallons per day use of our shared groundwater (plus more not included in that count), claiming an excuse that the DEIR miner cannot dewater the mine adequately to stop flooding, unless it takes more than its share of water from competing and higher local human priority uses. The same question applies as to the mines attempt to excuse excessive use of limited NID water during shortages in competition with local human uses. Because us voters and local property owners with competing rights will not tolerate suffering for this mine, that leaves you decisionmakers confronting the legal and political questions that the DEIR seemed afraid to address in a comprehensive and sufficient manner: what happens when the mine no longer has, or is allowed to use, the water it says that it needs for such mining operations?]

E. "Hiding the Ball" in the DEIR Is Not Compliance with CEQA And Other Applicable Law, And That Practice, Especially As To Water and Hexavalent Chromium Issues, Destroys Any Hope of Credibility For the DEIR Or Mine With Us Thousand At Risk of Water Impacts Living Above Or Around the 2585-Acre Underground Mine That the DEIR Tries To Obscure By Distracting Attempts To Limit The CEQA "Project" And The Related Water Issues

Ind 254-20

I. Introductory Comments To Expose Some Consistent Flaws In the DEIR Analysis To Clarify My Disputes With the DEIR, Especially Where the DEIR's Errors, Omissions, And Deficiencies Create "Apples vs Oranges" Disputes.

The DEIR pretends that it can comply with CEQA by treating this as if the only "project" were the Brunswick/Centennial Sites and 30 wells along East Bennett Road, when us thousands of local residents and voters like me who are living above or around the 2585-acre underground mine insist on knowing all about the risks, burdens, and harms to us from that mining underneath us. But see my # 14 and my supplemental CEQA brief. I do not know the DEIR authors' intentions (ie, I don't yet accuse them of intending to mislead the readers, although that is the result of the disputed DEIR.) As with hexavalent chromium and various other risks and issues (see my # 3.E), the DEIR could not have made the water problems more obscure and difficult to understand if that were their goal to minimize the problems and risks or confuse or distract the DEIR readers. Such DEIR inconsistencies and contradictions, even by themselves, violate CEQA's requirements for clarity and consistency. See my # 14. (If I were a law professor teaching an advanced environmental and land use class, I would give this DEIR a "D" grade or worse.)

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In any event, if the following discussion of the many water-related DEIR deficiencies, errors, omissions, and understated risks seems disjointed, it's because that is how the disputed data is presented in the DEIR. In many cases I follow (and quote from) the DEIR's disjointed discussions come from different DEIR sections, because trying to present a coherent, integrated discussion from their gerrymandered scattered and incomplete commentaries would be both difficult (or impossible for an outsider like me), and I fear any attempt at clarity would be attacked as an incorrect translation. See my # 14 on the CEQA need for clarity and reality, missing in this DEIR. Therefore, I use the DEIR system and quotes with cites below to illustrate my points that are more conceptually addressed in my #'s 3.F and G, 5, and 6 in the context of my and other local concerns about water, especially for those of thousands of us living above or around the 2585-acres of the underground mine.

Please remember as you government decisionmakers read, among the DEIR fatal flaws is the reality is that our much larger local community above and around the 2585-acre underground mine is at risk for water shortages and related problems that are not properly disclosed, addressed, or even covered by the other limited discussions in the DEIR, as illustrated both here and in my #'s 3.F and G, 5 and 6. See my # 14. **Among the many techniques about which a reader should be wary is that the DEIR often first states some disputed, unsubstantiated, or only partly relevant allegation, and then states a consequential (and disputed) "assumption" or "conclusion" as if somehow that impossibly "justified" such an erroneous and disputed "assumption" or "conclusion" into purported fact. (Decisionmaker officials should have a "key word" highlighted copy that includes a bolding of the words "assumption" and "conclusion" (and variants) for a revealing look at this DEIR problem.)**

Ind 254-20

These objectionable DEIR techniques and other errors, omissions, and deficiencies are especially common in places where the DEIR ignores the likely long-term impacts of climate change, such as much drier weather and much more chronic drought, and where the DEIR incorrectly assumes that the nonpredictive past somehow predicts the "new normal" future. See my #'s 3.M and 5. Indeed, my other # 15 asks **many hard questions dodged or unseen by the DEIR**, many relating to water issues, such as this one: **How can you government officials responsibly approve such 24/7/365 mining with such water risks and problems we identify (eg, here and in my #'s 3.A, B, D, E, F, and M and 5) for 80 years, when the DEIR only presents often inapplicable NID surface water data for 15 or 20 years (or until 2040), leaving us locals above and around the 2585-acre underground mine at extreme risk for longer term with increasing drought and other problems ignored and understated in the DEIR, even for that shorter period? Does the DEIR expect us to just surrender in ignorance to our fates for the last 60 or 65 years of the 80 years (or after 2040) of 24/7/365 mining, or without any credible science, rational bases, or evidence in the disputed DEIR? (Whatever the DEIR thinks, CEQA requires better as shown in my # 14.) Are we supposed to assume those last 65 or 60 years (or after 2040) will somehow be the same as the first 15 or 20 (or before 2040), despite all the credible science, facts, and experiences insist that our climate will continuously be getting drier and more drought harmed every year?**

Ind 254-21

Also, consider the related question, that the DEIR ducks entirely, because nowhere did I find any mention of the indisputable and crucial fact that there are thousands of us living on and using the surface above that 2585-acre underground mine or around that mine, all with our own rights to compete for our groundwater by individually or collectively drilling our own

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new wells when NID supplies become insufficient: How does the DEIR justify ignoring that data and risk about greater competition for our such water with the mine in the future? Does the DEIR dare to admit that they intend to oppose more wells by us residents and voters, so they can continue taking our groundwater for the mine, if that is their reason for the DEIR omitting such obvious realities? See my # 3.N. (By the way, if any government, in effect, allocates our groundwater to this mine with no net benefit to anyone (see my #4) by obstructing more or deeper local resident wells in the new climate change droughts, that will trigger not only extraordinary political conflicts we should all try to avoid (see my # 3.N), but also create causes of action for inverse condemnation, nuisance, and other claims (see my # 4).

According to DEIR Mitigation Measure 4.11-7 at 4.11-36 and Table 4.11-3 regarding "Non-potable Water Demand," "only 10 percent" or **84,000 gpd** [notice these numbers do not match others in the DEIR] of such groundwater from continuous dewatering the mine will be used for mine operations characterized as "Underground Mining Service Water" (eg, for "dust suppression" [asbestos?] in the mine and reused so not counted somehow), "Water Vapor In Ventilation" (eg, added to air circulation in the mine: 40,000 gpd), "Cemented Paste Backfill" (water, **with hexavalent chromium only discussed elsewhere as I complain herein),** is used to "transport and bind the cemented paste backfill underground" mixed with "500 tons per day of backfill": 20,000 gpd), "Gold Concentrate and Engineered Fill" (24,000 gpd), and "Dust Control and Compaction" (controlling "fugitive dust with 42,000 gpd "during temporary fill placement"). This does not include the 2585-acre mine dewatering about which we have even greater concerns. DEIR at 4.11-37 states (note inconsistencies with other DEIR comments elsewhere): **"Once the initial dewatering is completed [a massive water disposition down river discussed elsewhere, perhaps to avoid scary repetition], approximately 1,224 million gpd (850 gpm) are estimated to be pumped [continuously as discussed elsewhere] to the surface and treated at the on-site WTP on an on-going basis to maintain the dewatered mine."**

Ind 254-22

This is separate from what is described there at 4.11-35-36 + 38 as "Potable Water Demand" from NID listed (and then summarized in Table 4.11-3 as 5700 gpd for Brunswick and 17,900 for East Bennett Residential (31 residences, although sometimes also described as 30 in the DEIR) uses, and add with other water demands in Table 4.11-4, as I also consider data showing the coming NID aggregate water shortage problems discussed later that the mine makes uses worse). But the Tables do not seem to count the Centennial site NID water uses admitted at 4.11-36 of "approximately 42,000 gpd" of water "for dust suppression and compaction over the five-year period of engineered fill placement. Compacting 8 hours a day and 5 days per week requires water service of up to 125 gallons per minute (gpm). ... Approximately 42,0000 gpd may be required for dust suppression and compaction over the six-year period of engineered fill placement." (Consider what happens to asbestos in the dust when it's not watered, but the DEIR cannot create its own potential crisis and then expect us to sacrifice to stop it, when the legally and politically appropriate response is to reject the DEIR.)

Also consider this critical example, by studying pages 4.11-35 to 52 in the DEIR's "Public Services And Utilities" # 4.11 (where, in discussing NID water supply issues, they approach some realities more realistically, although deficiently), we discover more revelations than in the frustrating and intensely disputed 83 page discussion in "Hydrology And Water Quality" # 4.8 (where there again is no apparent attempt to reconcile that mine

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Ind 254-22

data with that NID discussion or even with other conflicting and disputed water discussions in many other DEIR sections mentioning water issues.) Among the interesting credibility challenges against the DEIR in this process is the foregoing and some following [slightly annotated by me in brackets to expose the DEIR's apparent "bait and switch" game] quotes at 4.11-39 to 43 from a subsection of that "Public Services And Utilities" section called "Projected Water Supplies," where the DEIR admits some of my Objections in conflict with its other DEIR claims and goals.

II. General Overview of the Disputed DEIR's Errors, Omissions, And Deficiencies Regarding Water Demands, Supply, Depletion, "Recharge," "Balancing." And Related Concerns.

The unaddressed DEIR issue this raises, as discussed throughout this Objection, is the competition for insufficient supplies of both NID and local groundwater that will continually pit us competing local residents and desirable users versus suffering for this undesirable mine with no net benefit to our community (see my #4), depleting our shared, precious surface and underground water at a time of coming chronic dryness and droughts from climate change that is largely ignored by the DEIR, certainly after the first 15 or 20 years (or after 2040) of their proposed 80 years of water waste for the profit of foreign mine investors. Again, how at this time of diminishing water supplies can government approve a mine with no net benefit to our community (see my #4) for which the disputed DEIR claims they cannot project water shortages or proposed mitigation beyond 2040, when the DEIR is asking for permits etc for 80 years (and using mostly inapplicable NID surface water data before then and irrelevant and misleading average rain data between 1967 and 2017)?

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While the disputed DEIR states different things in different places, the most detailed forward-looking comments are in #4.11 at 4.11-37 et seq, citing to Table 4.11-4 containing what purports to be "NID's projected annual future water demand through 2040," including the "additional project-related demand of approximately 26.4 ac-ft/yr for Brunswick Industrial Site and East Bennett Road potable water line customers." [Government decision makers should not accept any such grossly over-simplified and cherrypicked DEIR summary from NID reports that contain much more complexity and cautions and need adaptions for differences between NID surface water and our groundwater issues.] However, this all ignores the direct or indirect addition of NID customers, when and if as feared by most locals above and around the 2585-acre underground mine (often ignored in this DEIR commentary) lose their well water because of the mine, and they call upon the mine to honor its mitigation obligation to replace their wells' water supplies (or, if not, under the victims' common view of the applicable law compensate them for buying their own replacement water or drilling deeper wells, either way adding to the water shortage.) Based on NID comments at the March 24 hearing and written follow-up, NID appears to understand part of the DEIR problems.

Among the many disputed statements in the DEIR that defy logic and science from the perspective of local impact is this at 4.11-37: "Notwithstanding the potable demand of 26.4 acre-feet per year associated with the project, the proposed project would be a net contributor of water to the NID water system [BUT DOWNRIVER SOMEWHERE ELSE] as a result of the

project's ongoing discharge of treated mine dewatering water to South Fork Wolf Creek (850 gpm or about 1371 ac-ft/yr) ..." **Besides the hexavalent chromium threat from mine water that is ignored in the DEIR (See my #'s 3.C, G and H and 7), that is one of the provocative, "bait and switch" comments that obscures the key threats and issues that the DEIR evades. What that DEIR quote admits is that (as us locals complain about and will resist) the mine (i) would drain our local ground water in the 2585-acre underground mine area and adjacent areas (owned by surface owners like me with a right to compete for that groundwater we own during the coming droughts and NID shortages), and (ii) would relocate our water somewhere else downriver. That imposition of a unique and particular loss on one victimized part of the community is the equivalent of what the leading California Supreme Court said created liability for claims of the victims downwind of the sewer plant imposed on them, as discussed at my #4. If local victims are to be made to suffer even for the common good (which this is not and cannot be here for this mine as a private, rather than public project), then we must be compensated, especially when the project is private for no net benefit to anyone except the foreign shareholders receiving the profits. See my #4. Also, there appears to be no way for the DEIR miner to afford funding any such obligations based upon its admitted financial condition described in my #2.**

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The disputed DEIR at 4.11-39 addresses "Projected Water Supplies" with reference to the Table 4.11-5 discussed Water Code section 109109(c)(4)'s 20-year projection requirement, as if that somehow excused them for any CEQA discussion of the foreseeable drought and water shortage horrors to come in the rest of the DEIR 80 years of mining. See my # 14. That DEIR omission adds gravity to the disputed contentions in the DEIR during that first 15 or 20 years (or until 2040) that are discussed throughout this Objection and in others. Without trying to summarize all of those many disputes here, they include the reality that, during at least some of the next 80-years of climate change dryness and drought, those many thousands of local residents (like me) in the area above and around the 2585-acre underground mine will compete with the mine, and if necessary with NID, for our respective shares of our groundwater when NID supplies are no longer satisfactory, a time that will certainly occur sooner on account of the mining operations and the massive dewatering that send our groundwater off somewhere else down the Wolf Creek. While the disputed DEIR makes an insufficient and disputed attempt to discuss other NID water shortage variables, because the DEIR ignores climate change and drought realities that should be obvious to everyone, they must also consider the reality of government intervention, such as reallocating our water to even more drought harmed places. NID may doubt that for lack of a water transfer vehicle, but I saw reallocation happen with giant pipes when my East Bay MUD drought water transferred to Marin County in a massive pipe over the Richmond-San Rafael Bridge.

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The climate change/drought realities are going to harm many other places worse than here, and when that gets sufficiently severe, our NID water may be reallocated to more desperate places, and our limited supplies will be much more restricted than now. (For example, in a prior drought cycle, I remember when I was living in the San Francisco Bay Area and my East Bay MUD water supply was cut to 50 gallons per person a day, so that our water could be shifted to Marin County, where their intentional policy of not addressing their water needs so as to create an excuse against more residential development created a water crisis from which government insisted our water had to save them.) **The legal and political point that**

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the DEIR is missing entirely is that there will be 80 years of competition over insufficient supplies of water, and few of us locals can imagine any rational reason for any resident to suffer for, or defer to, water use for this undesirable mine that adds no net benefit to any of us. See my # 4 and 3.N. By the way, notice that the disputed DEIR in that cited subsection does not address the admitted NID water supply deficiencies even in the next 20 years as admitted in Table 4.11-6, discussed herein, and which DEIR understates the problem and ignores various realities.

The disputed DEIR at 4.11-7 at 4.11-39-43 and Tables 4.11-5 and 6, purports to address "Water Supply Sufficiency" also cited to that Water Code section [not to CEQA or other applicable law and not for these kinds of disputes with a mine DEIR for the next 80 years] and is subject to the flaws and worse mentioned above. This discussion rebuts many errors and omissions in the DEIR on this insufficiently discussed topic before it incorrectly concluded at the end at 4.11-43: "Based on the above [which is disputed, unsubstantiated, and insufficient and ignores climate change realities by looking to unrevealing history], sufficient water supplies would be available to serve the proposed project, as well as existing and reasonably foreseeable development during normal, dry, and multiple dry years. Thus, a less-than-significant impact would occur." This absurd conclusion is contradicted by the DEIR's own admission at 4.11-39: "Therefore, NID would be able to serve the proposed project in addition to existing and future developments with some reliance on demand reductions in dry years by 2025." See the DEIR's disputed description of NID's position at 4.11-8 et seq. (although correctly noting at 4.11-9 that "NID does not utilize groundwater as an existing or planned source of water due to limited groundwater availability," inspiring one of the many hard questions the DEIR dodges or ignores (see my # 15), which is: if there were as much available groundwater as the DEIR claims (and we dispute), why is that water source ignored by NID? Stated another way, why shouldn't we trust NID's admitted decision not to tap such "limited groundwater availability," instead of the DEIR? First, the disputed DEIR ignores the "new normal" of climate change's chronic drier weather and drought and greater competition from surface owners and users like me above and around the 2585-acre mine. Second, by refusing even to address the impact of 24/7/365 operations for the rest of the 80 years, the mine expects its surface owners above and around the mine and others to suffer an unknown fate of highly probable water shortages that government cannot responsibly permit to begin now. (Remember, as discussed throughout this Objection, such surface owners have our own individual legal rights as to our groundwater that the mine proposes to deplete, and so interfering with those thousands of surface owners' or users' rights can have legal and political consequences.) Third, Table 4.11-6 admits NID deficits for a single and multiple dry years, but that (and worse) may be all we can expect in the "new normal" future. The only DEIR "proof" is to the now nonpredictive past that ignores our new normal of climate change.

Looking back in history to average rainfall between 1967 and 2017 (see below and DEIR at 4.8-2) to predict that next 20 or 80 years is worse than misleading; it's irresponsible. See my # 14. Again, government decisionmakers, please note the different ways disputed DEIR water data is scattered, stated and, omitted (often inconsistently and confusingly) in various separate and unexpected places, as well as what many of us consider DEIR's many errors, omissions, and deficiencies. See my # 14. Also, again at 4.11-2 we have the dangerous "bait and switch" to which we objected earlier, plus again ignoring the **hexavalent chromium threat**,

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chronic drought and dryness for climate change, government reallocation to more desperate places, etc., where DEIR states: "However, this project is not expected to exacerbate NID's water supply shortages during dry years and the project will supply water into South Fork Wolf Creek, and the NID water conveyance system, at volumes exceeding the project water demand for potable water from NID." Again, such disputed and unrealistic DEIR dewatering "solution" would strip surface owners and users above and around the 2585-acre underground mine of their personally owned groundwater for transfer downriver somewhere else in the Wolf Creek. The consequences of that transfer on our local community are ignored by the DEIR by not by us locals. See, eg, my #'s 3.D and F, 5, and 14.

The disputed DEIR claims that it does not have to "speculate" about the future when it's about threats, problems, and risks of concern to us locals, but, when faced with admitted and other obvious problems like those we raise, the DEIR often assumes away the problems, risks, and burdens with its own speculations and assumptions. See my # 14. For example, at DEIR 4.11-42-43, the disputed DEIR speculates about NID planning in its "Plan For Water," about what will be left for NID's junior water rights, and about NID using DEIR treated mine water somewhere else in the NID system and ignoring the many problems, like hexavalent chromium and other toxic substances, that NID customers will find intolerable. The illusion is exposed in the DEIR "Conclusion" at 4.11- 51, where it incorrectly states: "Water supply exceeds existing and projected future demand, including the addition of the Idaho-Maryland project DURING NORMAL YEARS. Therefore, sufficient water supply is available to service existing and future reasonably foreseeable development DURING NORMAL YEARS." (Emphasis added) First, the second sentence does not follow in science or fact from the first sentence, even if one were to look realistically only at the next 15 or 20 years (or until 2040), as distinguished from what is reasonably foreseeable for the next 80 years of climate change impacts on the DEIR mine operations. Second, what they call a "normal year" is incorrectly based on history (see where the DEIR looks at the average rain from 1967 to 2017 and ignores the "new normal" of climate change and chronic dryness and drought.) Third, the dry and drought years are the "new normal," and there are admitted water shortages that will be worse than admitted by the DEIR (or estimated by NID), so that there will also be greater competition for groundwater and NID water not just with desirable newcomers who we would like to welcome to our community, but also with the thousands of us existing residents and voters living on the surface above and around the 2585-acres of the underground mine who have their own competing legal rights to such groundwater. See my #'s 4 and 14.

The disputed DEIR quotes and positions addressed in the previous paragraphs, especially at 4.11-42-43 and 51, have the same flaws as the disputed DEIR "Conclusion" admissions at 4.11-51 as follows, (but they seem inconsistent with them as well): "Water demand within NID's service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period." Reality will likely be much worse, but even that will create problems more than what the DEIR addresses, especially if one excludes the speculation and errors and adds what the DEIR omits adequately to address. For example, there is no satisfactory and sufficient basis for the DEIR's sheer speculation to conclude what so ignores such hard contrary issues **at DEIR 4.11-51 that: "This supply deficit can be addressed through NID's previously discussed Water Shortage**

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Contingency Plan, and as previously mentioned, the proposed project would be a net contributor of water the NID system" (which, as noted throughout this Objection, does nothing for those thousands of us living and using above and around the 2585-acre underground mine whose own groundwater would be exported downriver somewhere else with whatever hexavalent chromium, other toxins, and other problems it may contain).

Ind 254-25

According to disputed DEIR at 3-15 et seq., there are water treatment complication problems, and those seem to be insufficiently addressed, especially since there are historical, dangerous examples of what happened elsewhere when extraordinary storms (the "new normal" of climate change) overwhelm the capacity of the mine water treatment facilities, or it just suffers from human error or negligence, which human history shows has overwhelmed even much more safety conscious and competent facilities than this DEIR mine proposes. I have yet to meet an informed local willing to trust their home, family's fate, and environment to this DEIR plan, even if the miner could somehow afford it (see my # 2). Consider, as a minor threat example (before we get to Three Mile Island, Chernobyl, etc) what happened so often with the City of Santa Rosa's repeated water treatment failures (before they eventually upgraded the facility), while delaying upgrades for years that they almost killed the Russian River. Why does anyone think the DEIR 30-acre foot clay lined settling pond and other facilities here will be sufficient? Remember also all the toxins (eg, arsenic and ammonia admitted at DEIR 3-17) and objectionable other concerns (eg, iron and manganese at DEIR 3-17) in such water. What about the hexavalent chromium from the cement paste on the mine shoring being dewatered and passed into the settling ponds? A more satisfactory DEIR would have explained the Hinkley, California story about how their hexavalent chromium from such ponds has left it a ghost town with large graveyards and a huge liability claim settlement by those most consider responsible. It's all on Google, Wikipedia, and the EPA website. See, eg, my #'s 3.C, G, and H and 7.

Ind 254-26

In another "bait and switch" problem with the disputed DEIR, mine efforts to reduce its air pollution, especially of dangerous materials, has adverse effects on our other local environmental concerns. For example, the disputed **DEIR admits (at 4.3-49) that they "assumed that about 11 million gallons [of water] would be required [ie, wasted] for construction dust suppression." (Thinks asbestos cover up.) Even worse, the DEIR states on that same page in discussion of the mine's "Surface Fugitive Dust Controls": "To account for dust control measures ... the assumption was made that that active work sites would be watered at least two times daily, resulting in an approximately 55 percent reduction of particulate matter." However, when chronic climate change drought and water controls limit NID and other water use, as is ignored in the DEIR, but nevertheless is inevitable as an inconvenient truth, that means either our precious water will be wasted for such mine "dust control" or our particulate air pollution (again think asbestos) will be 55% worse than projected from the mine, leaving the obvious solution to that dilemma of simply shutting the mine that never should have been reopened in the first place.**

Ind 254-27

III. Misleading DEIR Mining Data That Incorrectly Assumes the Past Predicts the Future Without Sufficient DEIR Proof And Massive Omissions Relating To the "New Normal" Created by Chronic Drought And Dryness From Climate Change.

Ind 254-27

According to the DEIR (that incorrectly focuses on groundwater as if the only issue was the small number of wells (30 or 31) by the surface site at the East Bennett Road area), there are two relevant "watershed areas": the Upper Wolf Creek Watershed and the South Fork Wolf Creek Watershed. DEIR at 4.8-2. **Among the worst deficiencies in the disputed DEIR is its lack of any adequate discussion of the detailed underground and groundwater conditions in and around the 2585-acre underground mind now and in the DEIR new mining future. While the DEIR ignores those issues, the thousands of people (like me) living above or around that 2585-acre underground mine share (or, when adequately informed, will share) the doubts and concerns addressed in this Objection and others. Even if those objections are mistakenly ignored, the disputed DEIR must still be rejected for not revealing the consequences when (as discussed above) those thousands of local residents and voters react to future NID climate change drought rationing and drought shortages by exercising and expanding our rights to compete with more and deeper wells for our own groundwater supplies from both the same underground fractured rock sources as the mine, plus from NID. While the DEIR depends on assumptions from obsolete history about an average water fall of 52.81 inches from 1967-2017 (admitting a minimum of only 18.48 in 1977), no responsible person I know is willing to bet their home and future that the next 80 years will be as wet as that irrelevant, pre-climate change history. See the discussion above and in my #'s 3.E and 5 about how the DEIR presents a flawed analysis with somewhat inapplicable NID data only until 2040, forcing everyone else to guess how much worse things will get for the balance of the 80 years of proposed DEIR mining.**

Climate change for us means much more chronic dryness and drought. For example, what is our real groundwater recharge rate at realistic future levels of rainfall/snowpack in the "new normal" future? What if that 1977 low point of 18.48 inches is the new average? **CEQA requires science and facts, and the DEIR cannot just assume the average from 1967-2017 has any relevance to predicting our drier, climate changed future. That means the disputed DEIR is worse than wrong about its water supply "assumptions" (as well as misunderstanding why the DEIR cannot just cherry-pick the NID surface water data for this different application and groundwater context.) In our future 80 years there will be increasingly less "recharge" and "balancing" of the groundwater and less availability from NID, especially compared to what is wasted in the mine dewatering or even in surface NID uses at the mine, as discussed herein.** Contrary to the disputed DEIR, the mine will seriously deplete both NID and underground water that our community needs for better and more important competing uses in times of progressive climate change increased drought and dryness that the DEIR fails to address satisfactorily, if at all.

For example, **the disputed DEIR Figure 4.8-8, entitled, "Simulated Drawdown of Groundwater Levels Under Current Conditions," and related commentary are regarded by many of us opponents as misleading, because what the DEIR cites as "current conditions" are irrelevant and nonpredictive of the "new normal" future of such dryness, drought, and climate change. See my #'s 3.M and 14. That water shortage is also certain to change for the worse, because of the effects of the blasting, digging, tunneling, dewatering, and mining work itself, changing the underground conditions in those 2585-acres in ways that the DEIR does not attempt to predict as it mines into unknown conditions in new, expanded, and deeper areas. (Note the DEIR also fails to predict the starting condition of the mine after being**

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flooded and closed since 1956 with at best imperfect records.) What legitimate reasons would Rise have for asking for 80 years of 24/7/365 dewatering without seriously and properly addressing (especially after the misapplied NID data that cuts off at 2040) the future concerns of the locals (with whom the DEIR provokes perpetual water disputes)? Current climate science proves that such past is no guide at all to our future on these continuous water disputes. That is especially true when there are so many examples of groundwater depletion horrors already in the Central Valley, Bakersfield, and elsewhere, where those residents turned to new and deeper well to supplement inadequate surface supplies. See my # 3.M.

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The DEIR also admits (at 4.3-59) that "Potable water use at the Brunswick Industrial site was estimated to be approximately 1.4 million gallons per year," not counting the 3952 gallons of potable water used daily for the septic system, plus an estimated 2.8 million gallons per year of the 26 (or 30 or 31) East Bennett Road area residences shifting from well water to NID. Again, the disputed DEIR water usage discussion only addresses the small number of wells around the Bennett surface site owned by Rise. More importantly, mine efforts to reduce its air pollution, especially of dangerous materials, has adverse effects on our other environmental concerns about water. For example, the DEIR admits (at 4.3-49 and ignores any such data where it should be located in # 4.8) that they "assumed that about 11 million gallons [of water] would be required [ie, wasted] for construction dust suppression." (Why can't the DEIR ever call the dust asbestos?) Even worse, the DEIR states on that same page in discussion of the mine's "Surface Fugitive Dust Controls": "To account for dust control measures ... the assumption was made that that active work sites would be watered at least two times daily, resulting in an approximately 55 percent reduction of particulate matter." However, when chronic climate change drought and water controls limit NID and other water use, as is ignored in DEIR but is obvious and inevitable as an inconvenient truth, that means either (i) precious water will be wasted for such mine "dust control," or (ii) our local particulate air pollution (and asbestos) will be 55% worse than projected from the mine. The obvious solution to such dilemmas is simply shutting the mine that never should have been reopened in the first place.

Ind 254-28

All that water waste from fugitive dust watering above was not disclosed where it should have been in the DEIR's "Hydrology And Water Quality" chapter water discussion at 4.8 that was already deficient (see my #'s 5 and 3.D, E, and F), but, by separately burying these water details instead in the air pollution section at 4.3, the DEIR creates confusion and conflict and makes the water use numbers unclear. See my # 14. How are these DEIR 4.3 water use numbers in the air discussion to compare those in DEIR 4.8 water section? Once again, the disputed DEIR seems to prefer data confusion to the clarity and reasoned factual debate required by CEQA. See my # 14 and my supplemental CEQA brief. For example, we still don't know how this water use relates to the depletion concerns we suffer not just from our groundwater, but also from our competing rights to NID water during shortages, as our community would blunder further into shortages on account of climate change droughts and dryer weather that the DEIR ignored and insufficiently addressed. Id.

As my Objection describes above and elsewhere, the even bigger water problems will relate to the increasing competition to be expected with those thousands of us living above and around the 2585-acres underground mine who are entitled to our owned shares of the

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same groundwater source. For example, what happens when NID supplies in the coming chronic droughts are cut back (whether because NID doesn't have sufficient water or because its water has been reallocated elsewhere by government), and we all begin drilling our competing wells to survive for the next 80 years or until the mine stops wasting our water by dewatering and sending it downriver somewhere else? See my #'s 3.N and 14. Who will be the loser in that legal, political, and practical competition between us thousands of local residents trying to save ourselves, our trees and environment, and our community way of life, etc. versus the mine dewatering waste or twice daily watering dangerous mine dust for the profit of foreign investors? Our community and its residents cannot afford to lose in that perpetual competition, and, if that happens, it will be the fault of the government who was supposed to protect us from such calamities. Just saying "I told you so" to mine advocates and approval officials is an insufficient ending, and that mining should be not just legally incorrect, but politically impossible to sustain the way I count votes for any future local elections. **So, if it's inevitable that this mining will stop, sooner or later, sooner is better for everyone. In any event, CEQA and reason require responsible government to insist that the DEIR detail what happens next, when the mine stops after it were allowed to reopen. See my # 14 versus DEIR 4.3-103-104.**

Ind 254-29

To address the scale of the water depletion problems to come, Rise admits (DEIR at 4.8-42) that to clear the mine of water will require pumping for 160 days to remove 385 million gallons of water. Once so cleared, the dewatering process is stated (DEIR at 4.8) to pump away for treatment and downriver disposal in the Wolf Creek the amounts discussed above. While the DEIR makes a disputed attempt without sufficient evidence to claim there will be a "balance" between what is added from new seepage and what is continuously removed, that and other related claims are questioned or disputed above and elsewhere in this Objection (eg, my #'s 3.D, E, F, and M, 4, 5, and 14). Many **like me worry with good causes explained (eg, my #'s** 3.D, E, F, and M and 5**) about the risks that this 24/7/365 dewatering for 80 years is not only depleting the groundwater and drying out the surface owned or used by thousands of us local residents and public services above and around that larger 2585-acre underground mining boundary, but also in the surrounding areas. Nothing in the disputed DEIR adequately describes how far these adverse, water wasting consequences will spread over that long period. Also note near the end of this section my discussion about the DEIR's failure adequately to address what happens when the mining stops, including my rebuttals of the DEIR's "Non-CEQA Related Analysis" (at its 4.3-103-104).**

Ind 254-30

IV. The DEIR's Distraction And Evasion of the Real Concerns With Groundwater Depletion And Its Consequences For Us Thousands Living Above And Around the 2585-Acre Underground Mine, Especially Because the DEIR Fails To Address The Underground Realities Of That Mine Closed And Flooded Since 1956 And Now Being Subjected To New, Expanded, And Deeper Mining Without Adequate DEIR Analysis.

The disputed DEIR (4.8-2 at 4.8-54) states that: "The project site [unclear as usual if they mean only the Brunswick site or the real 2585-acre mine, since the DEIR usually tries to

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Ind 254-30

limit its discussion the smaller site, presumably to dodge the harder questions (see my #'s 14 and 15) and the concerns of the thousands of objecting surface owners and users above and around the underground mine] is not located within a groundwater basin that has been identified by DWR, and the nearest groundwater basin is located more than 15 miles to the west. ... Thus, the project could not impede sustainable groundwater management within a groundwater basin, because no such basin exists in the project vicinity. ... Groundwater is present within fractured bedrock throughout the region ... As a result [of deeper mining into unknown and unanalyzed conditions, which the DEIR contends, and many of us dispute as unproven, to be a good thing] dewatering of deeper tunnels and drifts would have less impact on groundwater levels in the fractured bedrock than would dewatering of shallower mine workings." As discussed elsewhere in this Objection (eg, at my #'s 3.D, E, F, and M and 5) **and others, this (like the bogus attempt to limit this groundwater problem to the East Bennett Area 30 wells) seems to play disputed word games, and the DEIR data is often nonresponsive to the real issues and is especially unclear about what surface areas are impacted above and around 2585-acres underground mine. See my # 14. For example, Figure 4.8-11, like the rest of the DEIR, is useless to us locals trying to place our surface properties' locations in reference to that underground mining. The real DEIR question is NOT that more general question about "groundwater basins" versus water in "fractured bedrock" or "fractured bedrock aquifer." That is just filler and a distraction.**

Instead of such DEIR distractions and evasions, what every local who is OR WILL BE depending on underground water for ourselves and our forests and environment (already drying out and becoming a fire and fire smoke hazard) demands to know in the future 80-year crisis of chronic drought and climate change is this: **Will the new and expanded (even deeper) 24/7/365 mining and dewatering of the 2585-acres, plus the mine's planned uses of NID water, for the next 80 plus years adversely affect the sufficiency of water for our competing local surface uses in the area and especially on the surface for owners and users and homes in the forests above and around the mine and in the larger "impact zone" (eg, for groundwater depletion and subsidence) or "stigma zone" around that (ie, where we suffer real estate value losses because of the mining)? See, eg, my #'s** 3.D, E, F, and M, 4, 5, and 8. Note, for example all the massive groundwater depleting and NID misuses described in this section and others that **the DEIR even admits, such as, for example (at 4.3-59) that its potable water use at the Brunswick site will be "1.4 million gallons per year**," with more surface "dust suppression" watering also explained above.

Ind 254-31

Also, considering the massive amount of local groundwater so used on mining sites or that will be pumped up and sent downstream somewhere else in the Wolf Creek, how can we be reassured of adequate "recharge" or "balancing" of our depleted groundwater supply, looking forward to that 80-year future (and not back to the no longer relevant past rain and snow fall before climate change and chronic drought began)? See, eg, my #'s 3.D, E, F, and M and 5. As demonstrated even so far in this section and such others, with more errors, omissions, and problems revealed elsewhere in these and other objections, approval of the DEIR and mine would be intolerable to those who live and vote here just on account of our water competition, conflicts, and disputes alone, even without regard to our many other, also sufficient, concerns. Among the many reasons, I focus on the groundwater issues so vigorously here, is that us locals above and around the 2585-acre underground mine have personal legal

rights to groundwater that are more substantial, powerful, and legally defensible than other interests that are threatened in these CEQA disputes with the DEIR. See my # 14. That means that this may not just be the normal CEQA legal process with parallel chronic voting and other disputes until the mine stops. See my # 3.N. Nothing in the mine approval process can defeat our competing groundwater rights (assuming effective enforcement us locals will expect from our elected officials in the future), unless (which seems legally, economically, and politically impossible), some government exercised eminent domain rights and subjected itself to inverse condemnation claims. See, eg, my #4.

Ind 254-31

Moreover, since that extreme DEIR mining will radically change the unknown and unanalyzed underground conditions in the 2585-acre mine below us in undisclosed ways that the DEIR never correctly or sufficiently addressed, how can we know how much worse that mining will make our future water shortages and other environmental problems for the next 80 plus years? See, eg, my #'s 3.D, E, F, and M, 4, 5, and 14. **Such questions that the DEIR evades (or fails to address at all) lead to many other questions not addressed in the DEIR but noted in this and other such sections and other locals' objections, such as, what are adverse effects of such prolonged dewatering (which means moving water out of our local community groundwater supply somewhere else downriver) on such legal rights of the surface owners above the 2585-acres and adjacent neighbors (like me), such as when such removed water ceases to help provide the "subjacent support" and "lateral support" needed to avoid the "subsidence" that has proven so damaging to other places in our Central Valley, Bakersfield, and elsewhere where the ground surface dropped as much as six feet on account of groundwater pumping and removal? See my #'s 4 and 14.**

V. DEIR Errors, Omissions, And Deficiencies In Addressing Imagined "Recharge" And "Balancing" of Our Depleted Groundwater Owned By Thousands Of Us Above And Around the 2585-Acre Underground Mine

This Objection and others explain why the DEIR's dodging or evading such critical groundwater questions is unacceptable, and why no DEIR can be legally approved without addressing them. See my # 14. In other words, **a disputed and inappropriate DEIR strategy of attempting to limit these groundwater concerns to 30 or so wells along East Bennett Road is an inappropriate distraction. See, eg, my discussion at #3.D, E, M, and N, 4, 5, and 8, of how everyone above or around the 2585-acre underground mine area (who can afford to do so), sooner or later, will be forced to drill deep wells and compete with the wasteful mine dewatering, no later in that future than when NID limits our NID water access, either because of shortages caused by drought or by government reallocations to even drier places. Also, note that the high cost and other issues of NID connections will cause many landowners to build with new wells. Distracting and tangent DEIR debates about "groundwater basins" cannot be allowed to deprive our community of essential water needed here in the next 80 years (not disposed of downstream somewhere else by dewatering a mine) on account of chronic drought and climate change never seriously addressed by the DEIR, as the proponents cling to their 1967-2017 average rainfall and other nonpredictive historical data they incorrectly claims enable them to pretend the past water situation will continue to recharge the depleted groundwater. Ask anyone in the Central Valley, Bakersfield, or elsewhere about**

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their recent experience with such bogus "recharge" assurances, as their local infrastructure breaks from subsidence caused by the surface dropping from over pumping of groundwater, but stand back, because they (like all water victims) may "explode" at the failure of their governments to stop water wasters like this mine (there not just pumping for agriculture, but sometimes for oil, gas, and fracking).

The DEIR (at 4.8-58) also states: **"The predicted drawdowns shown in Figure 4.8-11 are those that would occur in addition to the existing drawdowns due to groundwater inflow to the mine under existing conditions, as previously discussed and shown in Figure 4.8-8. As shown in the figure the drawdowns of the water table are generally within the mineral rights boundary. This is due to the low-K rocks where the deep mining would occur." First, note that there is no satisfactory scientific or even informed discussion about what incorrect assumptions underlie those DEIR figures, and there is no CEQA compliance by DEIR (see my # 14) telling us where to hunt through their disputed pile of disputable exhibits for unspecified data. Eg,** Concerned Citizens of Costa Mesa, Inc v. 32nd Dist. Ag. Ass'n (1986), 42 Cal.3d 929. See also my # 3.M, and 14, where I illustrate other examples of obscuring data, insufficient data, strategic omissions, and other inappropriate tactics prohibited by CEQA cases like *Banning Ranch Conservancy v. City of Newport Beach* (2017), 2 Cal.5th 918, 940-41 ("**Banning**") and *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), 40 Cal.4th 412, 442 ("**Vineyards**"), each insisting on "a good faith reasoned analysis," rather than scattered or buried data, and unexplained data in exhibits. See also my # 14. Here **neighbors (like me) cannot even figure out from the DEIR where we are on located by identifiable surface landmarks (eg, roads) above the 2585-acres in relation to that DEIR data. (Is that just a mistake, or is that a strategic intention in the DEIR? That is a question of good faith in CEQA challenges explained in my # 14.)**

Second, there are predictable surface versus underground owner disputes against the DEIR mining removing and wasting all that groundwater (and its subjacent and lateral support) underneath us such surface owners and users both under the 2585-acres and anywhere else in the area where the mine would suck away and deplete our underground water into those 2585-acre pumps. (While there are hundreds of such existing wells, and many of us locals may not yet be tapping into that groundwater in which we have rights and claims [note: groundwater is not "minerals" to be mined], that day is coming on account of climate change and drought, not just here, but also (as is already occurring) in other, even more needy places where the government may reallocate NID water and force us to compete harder with the mine. See my #'s 3.D, F, M, and N, 4, 5, 8, and 14.)

Third, the disputed DEIR assumed "recharge" and "balance" without satisfactory proof, by reference to the past (eg, the average rain/snow between 1967 and 2017) that ignores both the coming chronic droughts, drier conditions, and climate change, as well as the impacts on water supplies by the proposed and still unevaluated new, deeper, and expanded mining activities into unknown conditions. See my #'s 3.D, F, and M and 5. Why would the DEIR fail to address such obvious matters? One answer is that they have no feasible mitigation to propose against these inconvenient truths. Apparently, they prefer omissions to confronting these realities. But as CEQA noncompliant and wrong as it is for the DEIR to assume the average rainfall between now and 1967-2017 will apply between now and 2040 (by misplaced and disputed use of NID data out of context), it is worse for the DEIR to

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continue without any comparative other data to assume that does not change during the rest of the 80 years. See my #'s 3.M, 4, and 14.

As just noted about dodging the real "recharge" and "balancing" issues, the disputed DEIR (at 4.8-58) states: **"Importantly, Itasca's groundwater modeling accounts for continual inflow into the underground mine workings (ie, maintenance dewatering) as well as recharge into the fractured bedrock system, such that the groundwater drawdown levels shown in Figure 4.8-11 generally reflect a new state of equilibrium after the initial dewatering of the mine. Further, the modeling shows that the new equilibrium is little affected by changes in the amount of the recharge." See my discussion of CEQA court cases above and in my # 14, rejecting such DEIR attempts to incorporate in such a disputed manner a small part of a separate "Itasca study," such as *Concerned Citizens of Costa Mesa, Banning, and Vineyards*. First, note this study and comment is focused on the East Bennett Road 30 well issue, which is a small part of, and different from, our concerns and locations regarding the larger 2585-acre plus impact and stigma areas often (as here) ignored in the DEIR. Second, as noted above and discussed throughout this Objection (eg, my # 3M and 5), this disputed and incorrect DEIR analysis is based on history that is now largely irrelevant and misleading in view of drought, climate change, and new, deeper, and expanded mining. Third, from the perspective of neighboring victims losing their own groundwater to this wasteful mining process, the "fractured bedrock system" may often be even more dangerous and harmful than depletion of a bigger groundwater basin, since there is no reason demonstrated in the DEIR for us to expect "recharge rates" in the coming dry and drought future from climate change to continue to match the Rise 2585-acre underground mine depletion rates. See my # 3.M.**

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The smaller and more complex the groundwater source area of the "fractured bedrock system" being emptied beneath us objectors, the worse such impacts on us may be. There is no satisfactory or sufficient DEIR study or discussion of these issues between those of us on the surface above or around the 2585-acre and the dangerous conditions that may now exist in that long closed (1956) and flooded mine and whatever mining they are doing into the unexplored rest of that underground area 24/7/365 for the next 80 years. While our local surface area above and around the 2585-acre mine is much bigger than the small East Bennett Road area addressed in the DEIR, it is small enough that such DEIR imagined recharge cannot reasonably be expected from other areas, thus concentrating our local risks and (when they understand the impacts, risks, and burdens) rousing the almost unanimous thousands of residents whose home use and value and personal fate is at risk to this undesirable mine based on this disputed DEIR. See my #'s 3.N, 4, and 8, comparing the risks, impacts, and harms to our local community to whatever disputed and much lesser benefits may be claimed from this exploitive mine. However, as explained elsewhere (eg, my #'s 3.N and 8), the mine directly and immediately harms, impacts, and risks many more existing residents above and around that 2585-acre mine than the small number of jobs added, and the economic losses from mine harms, risks, and real estate value losses in the impact and stigma zones greatly exceed any imagined economic benefits from this no net benefit mine. See my #'s 4 and 3.N.

As one example of the lethal mistake the DEIR makes in exclusively relying on the past to predict the future (see my # 3.M), consider what the DEIR says (at 4.8-62) about "Potential Future Exploration And Mining" based on its "Itaska Report model" also disputed above,

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which provides largely irrelevant and misleading "simulations of [predicting that] the rate of groundwater inflow into the mine generally stabilize over the last 10 to 15 years of the 65 year model analysis." But see my # 3.M, and 14 counters, where I dispute this kind of use of obscuring data, insufficient data, strategic omissions, and other inappropriate tactics prohibited by CEQA cases like *Banning Ranch Conservancy v. City of Newport Beach* (2017), 2 Cal.5th 918, 940-41 and *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), 40 Cal.4th 412, 442, each insisting on "a good faith reasoned analysis," rather than referencing scattered or buried data, and unexplained data in exhibits. **How can such a model for a different situation based on the pre-climate change past be reliable or even useful in predicting future risks of groundwater depletion and recharge, when the DEIR ignores not only the unknown consequences of its new, expanded, and deeper 2585-acre underground mining, plus climate change caused drought and drier weather that does not recharge or balance as in the past?**

Why is this Itaska study misleading? [Also note, as explained in my # 14 citing cases like *Concerned Citizens, Vineyards, and Banning*, us objectors are not required to analyze and object to the details of all the hundreds or thousands of pages of all such studies which are disputed, but often because they are just outdated and wrong, but also because they are often inapplicable or irrelevant (eg, relating to difference places, situations, or issues) and full of unanswered questions, unrepeated limitations and qualifications, and other reasons why it should be ignored in this context.] Consider that this dispute study is the basis for the DEIR incorrectly to conclude at (4.8-65 in "Groundwater Recharge"): "Thus, the project would not result in any appreciable new areas of compacted soils or impermeable surfaces that could substantially restrict or otherwise interfere with groundwater recharge." This seem to be another classic "bait and switch," and it's inconsistent with other DEIR data. Whether or not that disputed statement is true (which I doubt), it is not a substitute for the obvious factors preventing recharge and balancing that the DEIR chooses to ignore. See my # 14. This DEIR cherry picking of snippets of inapplicable or wrong data from such incorporated studies not detailed in the DEIR is not CEQA compliant, as such cases like *Concerned Citizens, Banning, and Vineyard* and my # 14 explain.

One of the other DEIR problems with this kind of incorrect propaganda (ie, selecting some happy sounding things to say, while ignoring the more relevant science, issues, and "new normal" data after climate change that the DEIR ignores) is that in such a long report they leave hints of inconsistencies. (Again, this is another example of the flawed DEIR pretense that this mine CEQA analysis needs only to address that small Brunswick site owned by Rise and the 30 wells along East Bennett Drive and sometimes the so-called separate Centennial project.) **For example, in the discussion of the "Baseflow in South Fork Wolf Creek and Wolf Creek" the DEIR states (at 4.8-65) that: "Numerical modeling also indicates that dewatering could lower groundwater levels sufficiently to reduce the base flow in the South Fork Wolf Creek by as much as 0.1 cfs." The DEIR says not to worry about that, because the mine dewatering will end up moving our local groundwater downriver in the Wolf Creek for distant NID destinations that are irrelevant to our local recharge and groundwater needs. For the moment the issue is not the river flow, but this admission that, even ignoring the future effects of mining, drought, and climate change, Rise will be lowering the groundwater levels. That seems inconsistent with the DEIR's own analysis, which tries elsewhere to duck the**

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central concern of many of us neighbors, that the surface relevant water level will be lowered in the future by such mining as the ground dries out and the water table drops, thus harming our surface improvements, forests, and environment, depriving us of our own water rights as surface owners and users or as neighbors sharing the same underground water sources (whatever you call them) and potentially killing our already climate stressed forests and creating more fire hazards over the next 80-years.

VI. DEIR Water Depletion Mitigation Ideas Ignore DEIR Errors, Omissions, And Deficiencies And Fail Even Under Their Own Disputed Terms

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Even while ducking all the hard questions (see my # 15) and concerns of the surface owners and users above and around the 2585-acre underground mine and in the adjacent impact or stigma zones (like me), the disputed DEIR "Conclusion" and admission (at 4.8-66) is still: "WITHOUT IMPLEMENTATION OF A GROUNDWATER MONITORING PROGRAM AND WELL MITIGATION PLAN, THE PROJECT COULD RESULT IN A SIGNIFICANT IMPACT TO GROUNDWATER SUPPLIES." (Capitalization added). This understated conclusion is inconsistent with most of the DEIR commentary that precedes or follows it, as if they were written by different people having different opinions. Some might mistakenly celebrate even such a mild, if understated true conclusion among the many false and misleading DEIR statements disputed by me and others in our objections. However, this limited acknowledgment of an inconvenient truth serves as a distraction and "bait and switch," because it related only to the 30 wells along East Bennett Road, rather than the key areas above and around the 2585-acre underground mine that keeps being ignored by the DEIR, even though it is the major source of irreconcilable disputes for many of us objectors. Worse, the disputed DEIR then used the earlier disputed data leading to that conclusion to purport to justify a disputed and wholly deficient mitigation. No responsible government could accept such irrelevant groundwater mitigation monitors along East Bennett Road (or over the small surface areas owned by Rise) as any kind of adequate monitoring, much less mitigation, of the massive dewatering depletion of the shared groundwater owned by us above and around the 2585-acre mine. The unmitigated well threat is not going to be evaluated by those misplaced monitors. What is inevitable, if the mining is permitted, will be hundreds of existing and future wells going dry above and around that 2585-acre underground mine, as well as property owners wanting to drill new wells to use for their surface properties only to discover how much deeper they must drill to compete with the mine and how messed up their wells may be with the mine hazards, especially with the hexavalent chromium cement holding up that underground mine and, if *Hinkley/Erin Brockovich* is an example, adding new toxins to our shared water supply. See, eg, my #'s 3.C, G, and H and 7 (as to the Cr+6 issue) and to 3.F and M and 5.

The key, however, is that this CEQA analysis cannot be limited to the East Bennett Road 30 well properties, but is a general problem to be addressed for the entire area above and around the 2585-acre underground mine with hundreds more wells now and more to come. See my # 14. The mine is not just hurting existing wells, but all our groundwater rights in the area, including the rights of us surface owners and users and neighbors in the impact

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and stigma zones to compete with new wells to develop their land or when the climate change and drought future that the DEIR ignores prevents (ie, government reallocation of scarce supplies to needier areas) or disables (eg, insufficient supplies) NID from supplying us with sufficient water for ourselves, our properties and trees, and our environments. See, eg, my #'s 3. D, M, and N, 5, and 8. Incidentally, those who are more focused on the small number of mining jobs than on the vastly greater number of us locals harmed by the mine above and around that 2585-acre underground area or in the larger groundwater impact zone or real estate value lost-stigma zone beyond that, should consider this reality about the disputed mine: More construction jobs will be lost by inability to develop those surface properties in such areas because of the impairment of real estate values from the mine. See my #4. And this cannot be good for tourism.

THAT DEIR ADMISSION IN THAT EARLIER CONCLUSION OF "SIGNIFICANT IMPACT" TO GROUNDWATER SUPPLIES AND OTHERS (ALTHOUGH UNDERSTATED AND NOT FOCUSED ON THE BIGGER ISSUES AND PROBLEMS) LED TO THE DEIR CONCLUSION (AT 4.8-66) AND MITIGATION MEASURES (EG, 4.8-2(A)) FOR QUARTERLY GROUNDWATER MONITORING UNDER THE PURVIEW OF THE NEVADA COUNTY ENVIRONMENTAL HEALTH DEPARTMENT, BUT IN THE WRONG AND INSUFFICIENT PLACES. (The biggest issue is not 30 wells along East Bennett Road, but obviously the thousands of people with groundwater rights above and around the 2585-acre underground mine where no monitoring is proposed.) First, with no offense to underfunded and understaffed regulators to whom many of our impacted community will be unwilling to delegate their fates in their effort to match such evasive efforts of the mine forces, us affected neighbors directly at risk each need personal access to all information to match our standing to deal with such disputes, risks, and problems as a matter of self-defense, since these risks and problems are much more serious, general, widespread, and in need of more attention than the DEIR admits and more than Rise's chosen Itasca Denver Inc planner has investigated or addressed. Also, this is our surface owned groundwater, not exclusive mine water. (The Rise mineral deed revealed in its SEC Form 10K [not in the DEIR] was not of water rights, but just for minerals below 200 feet, as discussed in my #2.) FOR EXAMPLE, WHAT IS THE DEIR PROPOSED (FRANKLY TOOTHLESS AND NID DISPUTED) CURE FOR MONITOR IDENTIFIED PROBLEMS (which monitors are in the wrong places to identify the bigger problems)? MERELY THAT RISE PROVIDE REPLACEMENT WATER TO EXISTING WELL OWNERS WHO LOSE MORE THAN 10% CAPACITY IN THEIR WATER COLUMN WHILE THEY ADDRESS THE PROBLEM IN A LEGALLY DEFICIENT MANNER THAT WILL SATISFY NO VICTIMS (NOR NID). First, AS SHOWN ABOVE IN MY #2 ANALYSIS OF RISE'S QUESTIONABLE FINANCIAL CONDITION, THIS MITIGATION "ASSURANCE" IS NOT RELIABLE, BECAUSE THE RISE SEC FILED 10K AND 10Q ADMIT RISE COULD NOT AFFORD WHAT THAT WILL COST IN THE FUTURE FOR OUR THOUSANDS OF AFFECTED SURFACE OWNERS AND USERS. REMEMBER, this is not just about a few existing wells along East Bennett Road, although that is the DEIR's disputed and incorrect contention. See the ultimate DEIR Conclusion at 4.8-83, stating: "[W]hile groundwater would be drawdown due to ongoing dewatering of the mine during the operational life of the project [ie, 24/7/365 for 80 plus years], the project includes installation of a new potable water line along East Bennett Road to supply potable water that would offset potential impacts to domestic wells from mine dewatering." What about the rest of us wanting to compete for our same groundwater in the

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future drought and climate change crises to come above the 2585 acre mine and in adjacent impacted areas? Or when property owners want to develop their land and cannot achieve or afford the NID connection, to the dismay of our local builders who could use that work? This is about a threat to every surface owner and user above and around the 2585 acre mine and others whose water level is impaired or whose trees die and must be removed as fire hazards, not to mention the loss of real estate values and other harms and stigmas. Even if Rise were to be willing and able to make and afford an unsecured promise to compensate all such victims, enforcing that promise would be expensive, time consuming, and, if history is a guide, will have a disappointing result for all such victims. See My #'s 2, 3.N, and 8.

Further illustrating how the DEIR fails to predict the future, because it ignores both its own future mining effects and the irrefutable coming chronic droughts and drier weather and other climate change effects (see above and my # 3.M), the disputed DEIR, in effect, asks for future 24/7/365 mining "its way" for another 80-years based upon existing, outdated standards based on the irrelevant, insufficient, and misleading past data with insufficient mitigation that ignores the future climate change reality, as shown in disputed DEIR Mitigation Measures addressed above and 4.8-6 and 4.8-7. **Basically, 4.8-7 argues that, if the mine exhausts your groundwater, just use NID as mitigation (at 4.8-51-82). That ignores, among the huge connection cost (hint: even deep wells are cheaper) and many other things, the 80-year future when government will (for example, as East Bay MUD earlier did), insist that its customers had to live on 50 Gallons a day (in order to shift water to more desperate Marin County) limit from our NID water, so our local water can be transferred to drier and more desperate places. The DEIR also ignores our competing surface owner rights to groundwater owned beneath us for which we are entitled to compete against the 2585-acre mine uses. Ignoring the future and all those other concerns, the disputed DEIR incorrectly concludes (at 4.8-82): "While a small groundwater use would not be expected to combine with the project's groundwater effects because the increase would be small (due to the small size of the cumulative projects within the outlying areas) and the nature of the fractured bedrock aquifer system (eg, localized water-bearing fractures rather than one interconnected aquifer basin." Governments, please take note: this incorrectly says, in effect, don't worry because Rise does not expect any more growth in our area that would use competing water. Besides being wrong and again ignoring the future and the rights of us surface owners to use our own groundwater beneath us, the disputed DEIR is again ignoring the thousands of us already living on the surface above and around the 2585-acre underground mine. In effect, the DEIR is asking for its wasteful water use to crowd out both our local surface owner rights to access our own groundwater they are pumping and sending away downriver, plus competing future local surface growth, since everyone needs water.** See my #'s 3.N and 4. Beware, those who worry about local jobs, and governments, but who should be more concerned about inverse condemnation claims from landowners who cannot build, because they cannot access their own groundwater being taken by the mine. In effect, the disputed DEIR suggests stalling competing growth and competing water uses for existing local residents and users and existing local landowners, so that the DEIR mine can continuously dewater and send our groundwater downriver elsewhere 24/7/365 for 80 years (presumably to export mining profits to foreign investors as discussed in my # 2) without any net benefit to us locals and our community. See my # 4.

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F. One Illustrative Dispute Over Groundwater Depletion by the Mining.

Before passing on to other topics, I will illustrate some of the many flaws in one of the few places where its DEIR advocate actually attempted (but failed) to address the future risks and harms that concern us. At DEIR 4.8-62, it states (with my comment annotations in brackets):

> It is also noted that public concerns have been expressed regarding a scenario in which mining operations encounter a fractured bedrock aquifer and drain out the water, thus, impacting groundwater supply wells. Fractures of geologic discontinuities decrease with depth due to the weight of overlying geologic materials. The mining would occur in the deeper geologic units where the fractures, if present, are closed or have smaller apertures, which would not transmit significant quantities of water. The scenarios addressed in the Itasca modeling cover a wide range of probable situations that may be encountered and the potential impacts to groundwater levels. **[We are entitled to disclosure in the DEIR itself, and CEQA does not require us to read the relate reference library of technical studies we suspect are cherrypicked by the DEIR for their disputed but friendly treatment of the mine risks and problems. See my # 14. In this case there is a dangerous inconsistency, where the DEIR admits massive groundwater pumping, use and disposition depleting our groundwater (without the absurdly assured, but illusory recharge) by reliance on average rain between 1967 and 2017 that ignores the "new normal" of climate change dryness and drought. Nevertheless, the disputed DEIR here tries to assume away the problems, insisting, in effect, don't worry, because somehow the water will stay in the deep bedrock; two inconsistent positions that both ignore the realities in this and other objections opposing the 24/7/365 dewatering for 80 years, without any proof in the actual conditions of the 2585-acre mine now and as it may change during the new mining, deeper and more expansively. The DEIR may want to gamble against the risk of groundwater depletion not being recharged through all that fractured bedrock, while the surface dries out from unprecedented climate change drought and dryness, but none of us living above or around that mining will consent to that risk or such impact to our homes, our forests and environment, and our community way of life, especially as that stigma depreciates the value of our properties.]**
>
> In other areas around the perimeter of the mine workings, the projected maximum drawdown in private wells is less than two feet. In all cases, based on the information available through the well completion reports, the maximum potential additional drawdown in the perimeter areas is less than 10 percent of the available water column in individual wells. The maximum drawdown is also substantially less than the normal seasonal fluctuation in the groundwater levels of 10 feet to 30 feet or more. **[This is bad enough for objection, although it is again another illustration of the DEIR bait and switch, because they are talking about the 30 well area along East Bennett Road by the small Brunswick site, but not our area above and around the 2585-acre underground mine where the unrevealed and unstudied situation has been hidden by**

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flood since 1956 and is now proposed to change by new, deeper, and expanded mining 24/7/365 for 80 years. Where is the DEIR data and science that make that risk reasonable for us?]

Thus, in the perimeter areas and including a safety factor of 100 percent in calculations the project would not have any significant impact on groundwater supplies. **[citing the disputed study by EMKO Environmental Inc., in effect asking government, affected locals, and our community to risk everything on that disputed historical study and some selected sample of existing well data that ignores the coming new, deeper, and expanded mining into unknown conditions of the 2585-acre underground mine. No thanks. More importantly, because of the DEIR's general focus on avoiding opinions of the many objector properties located above or around the 2585-acre underground mine the DEIR generally ignores, as well as the broader impact and stigma zones owning or drawing from groundwater from the same source, that 100 percent calculation seems to be a 100% of a much smaller area around the Brunswick site, not the area where most of us objectors live and own the surface above the groundwater being depleted.]**

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Before this becomes a battle of experts and, if the DEIR or mine is approved over our continuous local objections, in the rounds of competition and litigation and political disputes to follow (see my #'s 3.N, 4, 8, and 14, infra), consider the following additional example reasons why that DEIR commentary is worse than unreliable and nonresponsive:

I. The disputed DEIR commentary focuses (again) on the past (eg, rainfall average between 1967 and 2017), as if that pre-climate change weather were relevant, when it's not applicable to the "new normal" in the future on account not only on chronic drought and climate change dryness, but also on the impacts of the new mining itself changing things radically by 24/7/365 blasting, digging, tunneling, and other mining work for 80 plus years. Nothing in the DEIR reveals the geologic conditions at the greater depths or the new or expanded areas for mining. Therefore, the DEIR seems to rely on the risky assumption that the new normal will be comparable to the irrelevant old data altered by climate change. That dangerous risk should not be placed on us innocent neighbors and our community, but the DEIR burden of proof and persuasion must remain on this undesirable, no net benefit mine. See my #'s 4 and 14.

II. This is not just about 30 wells going dry on East Bennett Road, but also about drying out the land above and around the separate and environmentally and legally distinct 2585-acre mine and creating dangers to our forests and other environmental factors, thereby adding to our already increasing fire and fire smoke risks and trashing our property values. Moreover, as discussed elsewhere, chronic dryness and drought will inspire us locals to drill hundreds more and deeper wells to compete with the mine whenever NID water supplies are limited, whether by

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shortages or governmental reallocations not imagined in the DEIR. Also, considering NID cost and connection issues, many landowners need wells to develop their properties. (Eventually, I also expect the many local people using NID "ditch water" will eventually have to switch to wells. And, as explained elsewhere, NID mitigation may not be possible when NID exhausts its own supply by drought and climate change or by government order to reallocate our NID water to more desperate places.)

III. The limited (and self-selected) DEIR 30 well sample from a noncomparable area of East Bennett Road to ours above and around the 2585-acre underground mine is both too small and too biased by the irrelevant past to be a guide (even with mitigation monitors) as to what to expect in the future, especially since the snowpacks are expected to diminish, and the competition for surface water will become increasingly more intense. Chronic drought and drier climate will be a progressively greater problem, especially when everyone with competing water rights wants to drill wells to save themselves from the scarce water future that water wasters like this mine wish to ignore by looking only to the now irrelevant and misleading past to predict our future, not only as to drought, dryness, and climate change, but even as to the effects of the new, deeper, and expanded mining; and

IV. The local impact areas include thousands of people living on Banner Mountain and other areas above and around the 2585-acre underground mine. Nowhere does the DEIR satisfactorily address the impacts and risks of dewatering and dumping the water downriver on those adjacent higher elevation places, some of which (eg, the Airport area) are admitted by the DEIR to be on the surface above the mine workings.

G. The DEIR's Disputed Errors, Omissions, And Deficiencies Also Include Water Quality, Especially Relating to Hexavalent Chromium (Remember *Erin Brockovich*?).

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In various places (eg, addressed at my # **3.C, G, and H and 7 [as to the Cr+6 issue] and to 3.F and M and 5)** the disputed DEIR talks about water quality issues in provocative ways with unjustified errors, omissions, and risks, especially relating to the ignored topic of **hexavalent chromium's toxic threats** addressed in various places in this Objection and others, since the toxic threat science is as compelling as the *Erin Brockovich* movie. (See the massive EPA website related data and why the European Union announced a Cr+6 ban starting in 2024.) Even if somehow our government delays the inevitable ban in the US (the irresponsible pattern of industry political resistance delaying regulatory reforms as seen earlier with asbestos, cigarettes, opioids, etc), the toxic stigma from this repetition of the *Erin Brockovich* horror movie will further harm our people, property, environment, and real estate values. **Some of the dangerous materials and chemicals admitted existing in the mine are summarized in the DEIR Mitigation Measure 4.8-1(a) at 4.8-52: "The NOI [to the Central Valley Regional Water Quality**

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Control Board under the Limited Threat Discharge permit] shall include evaluation of potential constituents of concern, including ammonia, arsenic, HEXAVALENT CHROMIUM, iron, manganese, pH, total suspended solids, TDS, and cis-1.2-DCE..." (capitalized and emphasis added.) Also, eg, DEIR at 4.8-53+ (and where addressed in my #'s 3.C, G, H, and 7), the DEIR explains how Rise expects to use hexavalent chromium in its CPS plans to (in effect) glue or cement material in the mine as a continuous part of shoring up the old mine and its new, deeper, and expanded mining processes 24/7/365 for 80-years, if they can get away with that over resolute local resistance.

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As addressed elsewhere in this Objection (eg, My # 3.C, G, and H, and 7), the risks are not only about incorrect, insufficient, or misleading data and assumptions by the DEIR and its advocates (eg, things like underestimating the dangers of hexavalent chromium that the EU is finally banning and, famously to bring that sigma to our community, what the groundwater polluter allegedly used previously to kill the town the town of Hinkley, CA in the *Erin Brockovich* movie and resulting in a huge class action settlement). **Key risks also include that the DEIR's new, expanded, and deeper mining 24/7/365 for 80 years may create worse or new exposures from that unanalyzed underground 2585-acre area that threaten our surface property, environment, health, and safety, but the DEIR offers no information on that topic at all, or even about the current starting point of this mine when it is dewatered for the first time since 1956. More importantly, permits for 80 plus years of mining using current (and many consider lax) toxic tolerance standards based on existing science or what part of science is motivating for bureaucrats subject to politics, lobbying and worse) will likely be not permitted in the future for good cause.** For example, the EU has announced a future ban on hexavalent chromium in 2024, and sooner or later it will be banned here too, just like asbestos, cigarettes, etc. **And, in any event (see my # 3.C, G, and H, and 7), do our governments really want the stigma of being called the "next Hinkley" and further depressing our real estate values and scaring away tourists and desirable residents (a term intended to exclude this mine and other harmful businesses)?**

H. Some Technical Comments About Hexavalent Chromium, Since The Disputed DEIR Fails To Even Discuss the Existence of Controversy, Much Less The Ugly Realities And Toxic Risks And Stigmas To Thousands of Neighbors (Like Me) Who Fear Us Becoming Another "Hinkley" As Mourned By The *Erin Brockovich* Movie.

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The prior and later mentions the disputed DEIR's admitted plan for extensive use of **hexavalent chromium** [Cr+6] in its new mining in the 2585-acres underground mine beneath thousands of us, without any discussion of that obvious, toxic controversy that everyone knows from the *Erin Brockovich* horror/reality movie. The DEIR stated, but did not identify or explain satisfactorily, the risks, impacts, and harms from some areas underneath us to our surface owned and used by us residents and voters, who (like me) object to the mine and the disputed DEIR. Indeed, **there is no mention of toxic hexavalent chromium in the section 4.7 of the DEIR entitled, "Hazards And Hazardous Materials." That omission should be lethal to the DEIR, whether they were hoping no one would notice this fact buried in another section 4.8 of their lengthy DEIR, or because they imagine trying to argue this is just an airborne killer that can**

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somehow be contained underground (incidentally, one of the many doomed arguments the asbestos industry tried to use to evade accountability, and everyone knows how that comparable situation ended in decades of misery and economic losses for everyone involved.) Our government decisionmakers need to consider the following realities, beginning with what little is revealed in the DEIR, then addressing the science (see the EPA website studies and reports and the EU ban and much more on Google or Wikipedia), and then addressing the stigma problems that make us neighboring real estate owners and surface users suffer even worse depression of values and marketability than we already face from mining burdens, risks, and impacts, even if this gold mine were perfect in every way (which it is not and no local or any rational real estate purchaser would trust such a DEIR on that issue).

The DEIR admits (at 4.8-51) that:

"The water ... from the underground workings is anticipated to have similar quality to the water that currently discharges from the existing drains. ... Therefore, the condition after mining is completed would be like existing, or baseline, conditions, such that seeps ...would not represent a potentially significant impact under CEQA [where the DEIR just addresses the iron and manganese issues and tries to further diminish the appearance of risk by describing how the new mining is going to be deeper. In other words, the DEIR claims that none of us need to be concerned about hexavalent chromium, despite all the EPA studies, science, EU ban, *Erin Brockovich* stigmas, etc]."

Among the many differences between the water in the now flooded mine closed in 1956 versus the new, expanded, and deeper DEIR mine to come (besides the effects of their mining in other places than before and of climate change etc) is that the entire new mine work for the next 80 plus years will involve extensive, admitted use of hexavalent chromium cement paste in shoring. That makes the previously quoted DEIR statement both wrong and a reason to challenge the credibility of the entire disputed DEIR, assuming, as many will, that this was a knowing omission in the DEIR to duck a controversy that CEQA requires them to address. See my # 14. Specifically, the DEIR admits in its dewatering discussion (at 4.8-42 to 51, especially at 46-49) that miners intend to use "underground paste backfill" (ie, material glued with "CEMENTED-PASTE BACKFILL") THAT IS (INCORRECTLY) DESCRIBED AS "ENVIRONMENTALLY BENIGN" BUT WHICH IS 'HEXAVALENT CHROMIUM' OR "Cr+6." (emphasis added)

If one "Googles" "hexavalent chromium" or reads the negative studies and reports on the EPA website, he or she is overwhelmed with links that expose the serious health and safety threats, especially if one were to then follow the science links, such as the studies of the leading experts, such as Wendy Wagner (University of Texas at the Austin School of Law, a specialist in and critic of EPA chemical regulation) or Steve Gold (Rutgers University environmental law professor). But since this Objection is addressed to government decisionmakers who may wish to know what the usually late and insufficient toxic regulators have to say (consider asbestos and cigarettes, both of which were eliminated by mass tort litigation jury awards causing bankruptcies of users based on science long before regulators acted), consider the mass of data that is readily available on the EPA website. (I share the

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attitude of another relevant expert Kyla Bennett, who is often quoted for complaining, that too often among industry influenced regulators such "chemicals are assumed to be innocent until they're proven guilty." In my experience such regulators delay their final rulings way too long for the victims and good public policy.) In my case that attitude comes not from scientific expertise, but from my 50 years of bankruptcy, cross-border insolvency, and insurance insolvency experience in many of the mining, asbestos, and other environmental and mass tort failures of that period. See my #1. Regulatory inaction aside, and besides a mountain of critical studies and reports, I cannot imagine any prudent businessperson using hexavalent chromium like this DEIR, especially now that the European Union is banning it effective 2024. Using that notorious substance seems foolish and uneconomic considering the incurable stigma, even if CR+6 were legal and the DEIR advocates hired some partisan science person ready to support them against the mass of contrary evidence and experts, and even if they were technically correct [which I and others would dispute, as was the case with asbestos, cigarettes, opioids, and other hazardous substances, which those industries defended for a long time, despite mass tort and bankruptcy hits, before the long obvious truths finally overwhelmed the lobbyists and political money.]

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A basic EPA website search shows 29,369 studies and reports when you type in "hexavalent chromium." To save time, start with the EPA "TRI Program" by focusing on the "toxic release inventory" which begins: "hexavalent chromium compounds are human carcinogens, classified as weight-of-evidence Group A ... under the EPA Guidelines for Carcinogen Risk Assessment (EPA 1986a) ... all the hexavalent chromium compounds are assigned a "High" hazard rating for the proposed RQ adjustment." See also EPA's report "Evaluation of the Potential Carcinogenicity of Chromium And Hexavalent Chromium Compounds" on its website since issued 5/24/2002.

Even if the DEIR incorrectly argued that (despite everyone knowing the water pollution killer in Hinkley) this CR+6 threat was somehow not about water, but instead about air, so they could somehow incorrectly imagine hiding it "safely" underground, like their explosives for 24/7/365 blasting for 80 plus years (an argument many of us not only dispute, but also ridicule, since history and experience proves human error inevitable over 80 years), the DEIR is obligated (eg, by CEQA and other applicable law and basic principles of civil and tort law) to reveal the controversy and present their alleged excuses for cross-examination. But assume for the sake of argument that the DEIR advocates were somehow correct and that oversight regulators and the government decision-makers mistakenly accepted those mining excuses, few others at risk will ever do so, especially those of us who have been taught by experience or wiser people that "it's better to be safe than sorry" about such things. **(Remember, the mass tort litigation results drove the asbestos, cigarette, opioids, and many other toxic industry defendants into bankruptcy long before their dangerous products were outlawed here.) However, what makes this situation especially compelling for rejection of the mine and its DEIR is that there will always be a stigma here because we already have a compelling and comparable case study that involves ground water pollution by hexavalent chromium. For those who never saw the movie *"Erin Brockovich,"* see the movie or read Wikipedia's (or other) accounts "Hinkley groundwater contamination," about how a notorious utility used that chemical, and then dumped the wastewater in spreading ponds in**

Hinkley, California, (now a toxic ghost town), and ultimately had to settle a class action with the local victims for $333 Million (back when that was serious money).

Government decision-makers here should consider this fact in deciding the fate of this disputed DEIR and mine, whether on this issue or about my even greater concern about water supplies or many other risks and problems addressed in this and other objections. It is not in the interest of our community needlessly to suffer for this undesirable and worse mine with no net benefit to our community (see my # 4) what would certainly follow such approval of such burdens, harms, risks, and threats to our homes, environment, and community above and around the 2585-acre underground mine. We locals have legal and political rights that are not eliminated by any such mine or DEIR approvals, **including our rights as surface owners above and around the 2585-acre underground mine.** See my #'s 3.N and 4. Thousands of locals at risk will be defending our homes and peace of mind against real problems, and (even if somehow decisionmakers were incorrectly to imagine the DEIR is sufficient and correct, despite my # 14 and other objections) an irrefutable stigma problem would still continue for our community that would trash our real estate values, meaning less new construction and money in the local economy and a negative reputation for tourists. See my # 4, demonstrating why there can be no net local or other benefit from this mine, even if it were feasible and affordable (see my # 2).

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I. **A Brief Plea For Responsible Government, And For Environmental Security And Peace for Our Community.**

There is already too much civil division and discord in our lives for this DEIR mine to be allowed to cause more. That is especially true when, as here, the mine provides **no net benefit** to us locals and our community (see my # 4) and wants to impose risks, harms, and burdens on us locals on the surface with 24/7/365 mining under and around our suburban (not "rural" as they allege by only discussing the area around the small Brunswick site) community for 80 plus years in order to export profits to the mine's foreign investors. The negatives for thousands of us locals far outweigh the few jobs for some mine workers from somewhere, and those of harmed and at risk are far more numerous (and likely would become single issue local voters.) At the end, whatever else happens, we locals and our community would end up (best case) with a mine mess stigma (and likely much worse) and ultimately another abandoned mine with not just the existing risks, but with then a mine that is bigger, deeper, and full of hexavalent chromium, while our precious water supply and other things may be damaged and/or depleted forever. The downside risks and burdens for us locals are too bad to ignore or accept, and under applicable law we should not have to do so. See my # 14.

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As demonstrated throughout this Objection, the disputed DEIR avoids dealing satisfactorily with even current science about the future, insisting by its disputed interpretation of CEQA that all government and the mine's potential victims need to know about the future can be deduced by the DEIR's chosen advocates studying the no longer predictive past. See my # 14. That makes the DEIR noncompliant with applicable law (see, eg, my #'s 4 and 14) and fatally deficient and flawed for its essential purposes. The proper questions that government should be asking (see my # 15) include these: Why impose under these circumstances all these many harms, burdens, and risks on our local residents and community, with materially adverse

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opportunity costs and obstacles for competing and more beneficial land uses (eg, depleted water supplies, exhaustion of the cumulative margins for air and water quality, etc), for a mine that helps fewer workers (from somewhere?) than the thousands of voting locals at risk and harmed by the mining? Where is the proof of any net benefit to our local community, since all the controversy, conflict, and disputes would appear to be for the sole benefit (with exported profits) for Rise's foreign investors? See my #'s 3.N, 4, 8, and 15. One related public policy corollary of that question is: why should our community give away to such a DEIR mine with no net benefit to our local community (my # 4) the margins we need locally for better uses of our precious water supplies and quality, air quality, and standards for toxic and hazardous substances? In the future regulatory standards will become stricter, but existing resource exploiters and wasters (like this mine seeks to become) will crowd out better future uses for which no such margins remain available. Why would any responsible government tolerate that, especially when us local voters will never do so, since the only way to stop the threats that would harm us, our properties (and their value), our environment, and our community way of life, is to resist the mine until it stops?

J. **Illustrative Air Quality Concerns That the DEIR Ignores Or Underestimates.**

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As to air quality concerns insufficiently addressed in DEIR 4.3, even it admits (at 4.3-70 and see also 4.3-73): "Therefore, prior to mitigation, the project would result in potentially significant levels of ROG, NOx, and PM10 emissions and could conflict with or obstruct implementation of the Ozone Attainment Plan pursuant to Criterion 1." Also see the underestimated asbestos problem inadequately addressed at 4.3-80 and 82-84. [This is another topic on which I defer primarily to my incorporated objections of others with greater expertise on our common air quality impacts, harms, and risks.] What this disputed DEIR does not address in such quotes is that, when the air quality is overwhelmed by any insufficiently addressed factors, such as chronic wildfire smoke or droughts preventing the watering of "fugitive dust," which can last for long periods and come from many different places over great distances, what happens? See, K. Alexander, "California wildfire smoke may rise to practically unendurable levels in next decades," San Francisco Chronicle March 29, 2022, discussing a Princeton/NOAA study that predicts from climate change that particulate pollution from wildfires will increase by more than 50% by 2050 and triple that by the end of the century.

All these DEIR deficiencies, risks, and impacts raise more questions than they even attempt to answer. See also my # 15. Will the mine shut down, or will we suffer worse air while the mine continues to pollute 24/7/365 for 80 plus years as if it were the only polluter in the area? Having created such air problem in such environmentally stressed times, will the mine claim exemption from rules applicable to the rest of us on the theory that such self-created risks are too dangerous to stop the mining mitigations? Also, consider the effects of new, expanded, and deeper mining in new places may create new or greater than "assumed" from the past threats, none of which risks are addressed in the DEIR (ie, they are, here again as elsewhere throughout the DEIR, "assumed" away based on a largely irrelevant and nonrevealing past and lax regulatory standards that inevitably will become stricter in the

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future). What have they withheld that CEQA and credibility require to be disclosed in the DEIR? See my # 14.

Mitigation of air quality problems addressed in disputed DEIR 4.3-6 at 4.3-91 + also admit some poorly described impacts that require mitigation. How will we be able to judge compliance locally with understated or ignored problems inadequately mitigated even in accordance with the deficient DEIR, not to mention compliance with applicable law and reality? See my #'s 10 and 14. Note how many at the March 24, 2022, DEIR hearing reminded the decisionmakers about how poorly Nevada County already ranks in air quality, and since our "F" grade cannot get any lower, they'll need to invent a new low grade for us after the mining starts. Speaking of the DEIR's absurd distractions from the real problems, what does the mine's "carbon offsets" elsewhere (see 4.3-96 plus) have do with making our local air quality and climate change problems less severe here locally where it matters to our health? (Long term promises like that cannot excuse current abuses of our environment.) See Table 4.3-23 and the inadequate Greenhouse Gas Emissions (GHG), admitting that (at 4.3-94):

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"However, project construction would have the potential to generate GHG emissions that could have a significant impact on the environment or conflict with an applicable plan, policy, or regulation ... and the projects incremental contribution of GHG emissions would be cumulatively considerable." As explained by the California Supreme Court case about the sewer plant's benefit to those at a safe distance by harming those downwind, allowing those downwind locals disproportionately harmed to have inverse condemnation and nuisance claims (and other decisions) addressed in my # 4, there are legal and political consequences independent of CEQA and mining permits for harming locals for the benefit of others at a safe distance.

Also, the disputed DEIR "Asbestos Dust Mitigation Plan" is disputed, insufficient, and based upon past data that may change radically with new, expanded, and deeper mining and especially because it ignores the reality of what happens in the new normal chronic droughts and dry weather from the climate change. For example, the disputed DEIR totally ignores what happens when the mine cannot wet the toxic dust, as discussed in my water objections above. The answer is that locals may use that occasion for courts or government to force the mining to stop, whether by court injunctions, government actions, tighter regulations, or other legal remedies (see my #'s 3.N and 14). Also, the deficient DEIR mitigation plan ignores the predictable consequences of human error, and ordinary, sloppy behavior (which is hard for outsiders to monitor, although some will try and all will be ready to denounce when it is

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discovered) in handling such asbestos and other toxins, like the hexavalent chromium threats they keep ignoring in the CEQA noncompliant DEIR. Asbestos litigators are always looking for more defendants, and they often sue for less releases than are imagined by the DEIR here. Many such plaintiff lawyers will already be focused on the mine, because of the hexavalent chromium threat once the mining starts. (Note, that is not my kind of law practice, but those aggressive lawyers did manage to stop many bad industries, like asbestos, cigarettes, opioids, etc, long before the politically over-lobbied regulators were willing to act, so many of us won't mind what they do to this DEIR mine.) So, what does that all do to the mine's feasibility, which seem to drive all their profit driven planning for foreign investors? See my # 2. The DEIR's answer is its admitted mess described in its 4.3-103-04, but I believe that is an understatement of the adverse consequences, which is why the mine should never reopen.

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As noted in DEIR 4.3-2 at 4.3-79, the disputed DEIR calculations (again based upon an erroneous "assumption" that the mine's emergency generators would only operate up to 100 hours per year) focus on misleading past data, not current reality. Besides underestimating climate change and the "new normal" of forest fire and weather shut offs, the DEIR fails to accurately describe PG&E's Public Safety Public Shut Off (PSPS) program to keep its often old and dangerous equipment from starting more fires with legally forbidden trees and vegetation PG&E will need at least a decade to clear, as admitted by PG&E in the official records discussed below, some of which are on the PG&E website. Based upon the "new normal" (eg, begin considering the real experience with the fires and with blackouts for weather, equipment problems and constant replacement work, and PSPS since 2019), that 100 hours assumption is both absurd and in conflict with all the relevant data readily available from on the following public records (ignored by the DEIR and the Rise SEC Form 10K explained in my #2): (i) in multiple CPUC hearings, orders, investigations, and reports on its website (all more recent and relevant than the largely superseded and heavily amended and supplemented old PG&E PSPS report to the CPUC cited in DEIR footnote 45 at 4.11-35), (ii) in PG&E's criminal probation proceedings before Judge Alsup in US v. PG&E Co., Case No. CR 14-0175 WHA pending in the Northern District of California, which often has the most useful data, (iii) in the docket of the PG&E Chapter 11 Case No. 19-30088 DM Pending in the Northern District of California Bankruptcy Court (San Francisco), and (iv) even on the PG&E website. As a bankruptcy lawyer intensely involved for affected clients regarding these issues in those three proceedings against PG&E and a local with my own natural gas generator apparently on the same local Brunswick PG&E electric facility distribution hub as the DEIR mine, I make an offer off proof that a more reasonable estimate of total generator use during the next decade alone on account of all such various PG&E issues will likely average at least 5 times the DEIR annual "assumption" about generator use from PG&E electricity cut off causes alone. Since our air quality is already a problem, it should matter that these backup generators (and more, they would need backups for these insufficient backups) will increase the problem. More importantly, that large of a DEIR mistaken "assumption" about generator use illustrates why the DEIR lacks credibility generally.

People (like me) who can afford generators have all invested in expensive systems (as recommended by PG&E itself) in anticipation of chronic and repeated blackouts from extreme weather events, fires, PG&E's PSPS program, PG&E's enhanced system improvement, repair and maintenance work, and even out of PSPS program emergency shutdowns, all planned and now beginning at a historically unprecedented pace, thanks to greater regulatory pressure and especially to Judge Alsup's probation condition orders. Moreover, because of such record and the admitted age and poor condition of much of the PG&E system here that needs to be replaced and upgraded, because of PG&E's need to catch up from decades of neglect of prohibited trees and vegetation next to its wires (estimated by PG&E to take a decade), as well as because of PG&E's recent plan to underground 10,000 miles of power and distribution lines, there will be massive and frequent disruptions in our local electric supply for years. All that means, for example, more generator use and that, as air quality issues become stricter, there will also be competition over who gets to run defensive generators in a zero-sum game. Will us locals be asked to cut back on our

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generators so the mine can keep their generators at normal use to prevent mine problems they knowingly caused?

If applicable governments approve the disputed DEIR and attempt to interfere with our competing, self-defense resistance, that will provoke us opposition voters into more vigorous political and legal actions (see my # 3.N), especially as to the most provocative, implied DEIR idea that us local voters should suffer such chronic blackouts in our community by not using our generators, while the mine generators operate instead of ours. Consider how many of the thousands of us work from home and need our generators to remain functional. How can responsible government possibly allow this DEIR mine to create a new problem with no net benefit to our community (my # 4), and then claim priority for their generators to mitigate the problems they knowingly created over these objections? I cannot imagine any neighbors would consent to or tolerate losing any generator competition to the mine. Divisive things like that would create the political and law reform competition I discuss at my # 3.N, and as a good citizen I hope we never have to test the complex jurisdictional issues over who gets to deal with the law reforms to effectively mitigate and stop the mine harms.

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Consider, for example, that the DEIR admits (at DEIR 6-14) that the mine is economically infeasible if it is cut back to a normal 12 hours a day for mining (instead of 24), which would be one of our new legislative priorities. When the DEIR advocates try to stop that kind of local law, they will then encounter local resistance insisting on at least priority of generation use for human needs over mine profits, just as we will be requiring priority for our human uses over mine uses of scarce water. Allowing the DEIR mining 24/7/365 is bad enough when our local electricity is working, but as soon as us resident voters are told the mine's air pollution and other environmental abuses get generator priority 24/7/365 for the air quality that inhibits us, the mine's end is near. Again, there is no one here who can be expected to tolerate suffering anything for this no net benefit mine we must continue to resist until it stops harming us. See, eg., my #'s 3.M and N and 4. Sooner or later this mining will stop for all the reasons it never should have started. I make this a formal offer of proof to any official decisionmaker interested in more data from the public record exposing more about these DEIR errors, omissions, and deficiencies.

K. Because the DEIR Fails To Comply With CEQA in Many Ways (see, eg, my # 14), The Strange DEIR "Non-CEQA Related Analysis" (#4.3-103+) Is A Revealing Admission About Some of What the DEIR Should Have Disclosed About What Happens When The Mine Starts And Then Stops, Whether From Lack of Funding Or Gold, From Our Local Legal Or Political Resistance And Law Reforms, Or Otherwise.

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There are revealing admissions in the DEIR at 4.3-103-104, entitled "Non-CEQA Related Analysis," another unhelpful title for another topic again better positioned elsewhere, adding to its many ways the disputed DEIR obstructs anyone seeking clarity from its scattered disaggregated data of concern to potential local victims. See my #'s 3.E and 14. Nevertheless, "Non-CEQA Related Analysis" is an important admission about how vulnerable the mine is if it loses electric power, including from PG&E's "PSPS." See my analysis of the

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electrical issues in the air-quality/generator dispute in my previous subsection 3.J (a topic on which I have extensive experience and knowledge. Decisionmakers should note that it doesn't matter what or why the electricity stops, because the main adverse effects on the mine are the same, whether the current stops for failure to pay the electric bill, for PSPS, PG&E system upgrades or repairs, or other actions or inactions by PG&E, from storm blackouts, or from other causes. The DEIR mitigation is generators, which are critical to the mine's functionality to avoid mine flooding and other consequences, and which add to the air quality and other issues addressed by this Objection. See, eg, 3.J and 10. I focus on this here at the end because this is the only place where the disputed DEIR even attempts (and fails) to discuss in any detail what happens when its mining stops after it starts. What that DEIR discussion reveals is some of what the fragile economics of Rise discussed in my # 2 above and elsewhere are environmentally critical, because if the mine somehow finds enough funding to start (since is financials at my # 2 do not now report sufficient funds to accomplish even the beginning DEIR work), the mine will likely find funding even more difficult to raise to cover the admitted losses caused by any such a stoppage. See, eg, my # 2 and 3.N.

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While stopping the mine is our continuous defensive goal, and we cannot imagine any adverse consequences of stopping the mine to be worse than its continuing operation, CEQA still requires the DEIR to disclose those consequences of stopping; an irony since the DEIR's only attempt to do so is labeled a "Non-CEQA Related Analysis." See my # 14. Consider what the disputed DEIR admits (at 4.3-103-04) about all the things that happen when the mining stops for lack of electricity. Those same problems will also occur for anything else that stops the mining, whether its lack of sufficient groundwater, court injunctions (eg, stopping the use of hexavalent chromium or groundwater waste), lack of operating funds by Rise (see my # 2, which is already a currently existing problem), incompatible legal requirements (like a mere 12 hour day work limit we locals advocate, which the DEIR admits at 6-14 can stop the mine operations), and other events, including its own human errors (eg, water treatment wrongs, the explosives, etc.) or surprises they encounter in their blasting, tunneling, or other mining work into old or new, expanded and deeper areas of the 2585-acre underground mine (eg, what if they unleash more toxins than their water treatment plan can correct and the dewatering stops?), etc.

For example, as to the data errors that I mentioned in 3.J that illustrate a pattern of disclosure credibility problems, those disputed DEIR statements about PG&E's PSPS ignoring many other electricity blackouts and generator use problems, are insufficient, inaccurate, and outdated. See my # 3.J. For instance, the DEIR admits in that part 103-104 many health, safety, mitigation failure, economic problems, and other hazards that will occur, if the mine dewatering is even briefly impaired by any blackouts. Since the DEIR is itself creating problems and risks that will require extensive use of its generators in competition with our many other generators in and continually being added to the local area, the disputed DEIR cannot claim priority generation rights in that competition with us locals for knowingly creating its own crisis needs, and those legal and political disputes will be extreme, since most of the community above and around the mine will never willing sacrifice anything for the benefit of this no net benefit mine and its foreign profit takers. See my #'s 3.N and 4. People here cannot imagine failing to resist shutting off our generators and suffering without electricity needed for our homes (where many work), while the nearby mine generators

pollute our air while they also drain away our groundwater through their hexavalent chromium mine walls, etc.

See my discussion in my # 3.J above of the DEIR's dangerously deficient "Asbestos Dust Mitigation Plan," which, for examples, depends on water that may not be available 24/7/365 for 80 years. Likewise, the DEIR's odor analysis at 4.3-85 plus is also based on unrevealing history unrelated to the new, expanded, and deeper mining, which may unearth bigger new threats, because the DEIR has no idea what they will encounter in their blind pursuit of gold. The same discredited "assumptions" that somehow the past must reveal the future, which ignore the new mining activities in unstudied parts of the underground mine flooded since 1956, as well as such climate and other changes. The DEIR/Rise business plan seems to be based on a variant of the old predator theory that "it's better to ask for forgiveness, than for permission." The DEIR version of that theory seems to be that their path to mining is easiest to achieve if they ask for permission by a DEIR that contains errors, omissions, and deficiencies, and then ask for forgiveness when the much worse realities are exposed on the theory that stopping the mine would be too harmful to everyone, such as by the adverse stopping consequences the DEIR admits at 4.3-103-04 in a section quaintly and inaccurately labelled "Non-CEQA Related Analysis." My point here is that there will be no forgiveness to reward or allow this miner to have another chance to harm us. See, eg, my #'s 3.N, 4, and 14.

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Mitigation of air quality problems addressed in DEIR 4.3-6 at 4.3-91 plus (discussed in my # 3.J) also admits some poorly described problems that require mitigation. How will we be able to judge compliance with understated or ignored problems inadequately mitigated even in accordance with the DEIR, not to mention compliance with applicable law and reality. What does the mine's "carbon offsets" elsewhere (see 4.3-96 plus) have do with making our local air quality and climate change problems less severe here where it matters? See Table 4.3-23 and the inadequate Greenhouse Gas Emissions (GHG), admitting that (at 4.3-94): "However, project construction would have the potential to generate GHG emissions that could have a significant impact on the environment or conflict with an applicable plan, policy, or regulation ... and the projects incremental contribution of GHG emissions would be cumulatively considerable." But see my #'s 3.M and N and 4.

In summary, I note the DEIR footnote 48 at 4.3-104, which may be the DEIR's attempted excuse for it massive omission and consistent refusal to deal with the "new normal" future and climate changes, as well as to resist any discussion beyond assuming the past will reveal the future, even though that is absurd in time of climate change, chronic drought and drier weather, water shortages, air quality deterioration, increasing regulatory standards and other changes. See, eg, my #'s 3.E, M, 4, and 14. For example, consider the fact that the disputed DEIR too often incorrectly assumes and pretends that the 2585-acre underground mine conditions into new, expanded, and deeper areas are the same as when the mine closed in 1956. That presumed, disputed, and refuted DEIR excuse is their meritless claim that, for purposes of CEQA Guidelines 14 CCR 15145, that the DEIR can ignore "a particular impact [that] is too speculative for evaluation." But see my # 14 and my coming legal rebuttal supplement. That disputed "speculation" excuse applies to none of the criticisms and concerns raised in this Objection and other key objections. To accept that absurd DEIR logic would mean that, for a 24/7/365 -- 80 plus year project in an unknown

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condition since it closed and flooded since 1956 can reopen to expand blindly into new and deeper areas of the 2585-acre underground mine without anyone being able to complain because such complaints are "speculative". No. What is speculative is the DEIR mining into such unknown conditions and assuming that whatever conditions existed before 1956 can be relied upon as to whatever else they do in that 2585-acre mine for the next 80 years. No responsible government can give such a miner a "blank check" to indulge itself like that beneath us in our suburban community, especially since Rise does not have the funding or unencumbered assets to pay for the harm it causes. See my #'s 2 and 14 and my coming legal rebuttal supplement.

The DEIR cannot do whatever it wants, just because that distant future is too "speculative." See my # 3.M and 14. Nonsense. And, in any event, what is "speculative" is what the DEIR chose to evade and not investigate or address, but which is addressed by science and observable facts the DEIR just finds inconvenient or worse to their goal. See CEQA and my # 14 and supplemental briefing. But here's the thing that matters most in all these debates in this Objection and others: the burden of proof and persuasion must be on the disputed DEIR, and it cannot say they wish to proceed and ignore obvious risks and problems because they wish incorrectly to consider them "too speculative." This situation is worse a criminal defendant demanding some special relief, while taking the Fifth Amendment and refusing to address a mountain of damning evidence and suspicious circumstances as "too speculative." Why? Because such a criminal defendant has a right not to speak, but no mine has a right under these circumstances to reopen like this after being closed since 1956, especially without adequate disclosure (see, eg, my #'s 3.E and 14) and convincing everyone who matters that all the obvious risks and problems are not just solvable but will be solved (something this DEIR cannot do, even if it tried. See my # 2). What is "too speculative" here are the disputed assumptions, arguments, and so-called facts on which the disputed DEIR purports to justify the mine reopening.

L. Consider The What The DEIR Is Not Disclosing (eg, my # 3.E and M and 14) And The Questions That The DEIR Is Not Answering, Because Those Of Us Impacted Or At Risk Will Assume the Nondisclosures And Answers Require Continuous Resistance To the Mine (See my #'s 3.N, 4, and 14).

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Considering such admitted DEIR facts quoted in this long rebuttal alone, my many stated questions about DEIR errors, omissions, and deficiencies must be answered before any such DEIR could be worthy of consideration. See, eg, my # 3.E and M and 14, as well as my # 15, asking more hard questions evaded or ignored in the DEIR. Such questions are especially serious because the DEIR never sufficiently addressed the consequences of its future 24/7/365 mining for 80 years, except by reference to the irrelevant and misleading past data that cannot accurately predict our relevant future. See my # 3.M. No one tells us in the disputed DEIR what will be unleashed by its new and expanded and deeper mining in the 2585 underground mine beneath or near thousands of us locals, since the DEIR just assumes (incorrectly placing the risk of the unknown on that massive underground mine's neighbors) the same future situation as in the past BEFORE 1956 when the mine last operated, although no one even knows the true

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starting condition of the mine closed and flooded in 1956 or what will be unleashed by the new, expanded, and deeper mining under the new normal of our changing climate the DEIR ignores. See my # 3.M. Responsible governments also must consider what happens in the future when industry lobbyists lose their applicable influence sufficiently for impaired safety regulations finally to catch up with science and reality. See my #'s 3.N and 14. What happens then, when mine advocates cannot dodge such risks and problems they created with the toxic and hazardous substances (eg, arsenic, asbestos, and hexavalent chromium, for example). See my #'s 3.K, L and N, 4 and 14, as well as for toxics #'s 3.C, E, G, H, J, M, and N, 4, 6, 7, and 10.

Even if one were willing to overlook the impacts and risks identified by the best science that prevails outside of the industry influences, there remain the human risk factors when dealing with such dangerous substances and supposed mitigations. What happens if negligence or economic poverty cause neglect at the mine fails to maintain the promised safety and mitigation protections for us locals? Considering the admitted realities in my # 2, how can we rely on this DEIR for consistent compliance for such 24/7/365 operations for 80-years? For example, as discussed above, consider the problems of the mine continuously using hexavalent chromium for its underground paste backfill (think concrete like mining shoring with that toxic substance, as all those millions of gallons of underground mine water are pumped up and, after DEIR deficiently described treatment (if it happens as promised) flows away in the Wolf Creek somewhere downriver. Think also about all that mine again flooded water sitting for eternity against that massive underground structure made of toxic hexavalent chromium in our community. (And again, watch the *Erin Brockovich* movie, read my #'s 3.C, G, H, and 7, and consider what you would tell a buyer of your house above this 2585-acre underground mine.) Why doesn't the DEIR adequately address those issues now before the dispute processes change and such evasions become much more challenging for the mine? See my #'s 3.E, J, L, and M. For us locals, this is like someone constructing a building with asbestos in the days before it was finally banned, but when everyone could already see that ban coming because of the massive obvious health problems and related litigation that had already begun to bankrupt many in the industry (without satisfying most of the victims). That is the kind of history that should concern responsible government and require strict compliance with applicable law (see my # 14 and my supplemental CEQA brief) to avoid the continuous legal and political conflicts and practical property surface versus underground miner competitions that are inevitable until the mining stops (see my #'s 3.N and 4).

M. Among the Biggest DEIR Disputes Is About Timing of Facts When Making This Decision About An 80 Year Plus Future Impact, Risk, And Burden, When We Know That The Past Is A Faulty And Largely Irrelevant Guide To Predicting The "New Normal," Which the Disputed DEIR Fails To Do So Either (i) By Its Almost Exclusive Focus On That Unhelpful Past Data, Or (ii) Its Limitation To (At Most) Occasional And Deficient Looks At The Fantasy The DEIR Imagines In The Next 20 years (Or Until 2040).

The DEIR Cannot Assume (As It Does) That Such Earlier Conditions Will Apply Equally To 2040 Or To The Next Unanalyzed 60 Years Of 24/7/365 Mining Of The 2585-Acre Underground Mine

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Below And Near Thousands Of Us Suburban Residents. The DEIR advocates have refused to engage in any meaningful effort to predict rationally with credible evidence the extent of future burdens, harms, and risks. Instead, with one limited and incorrect use of NID data until 2040, the DEIR's exclusive focus is on backward looking data, such a long-term, historical averages (eg, average rain between 1967—2017) that science and most people who are not mining advocates generally regard as irrelevant, misleading, and worse in the new normal of climate change and with respect to mining data. See the other incorporated objections with more specific data from more credible sources (my # 1). The question is not the history (eg, average rainfall between 1967 and 2017) before climate change; it is about the "new normal" that is here now and getting progressively more damaging from extraordinary and unprecedented dryness, drought, fire, fire smoke, storms, etc. Few responsible, credible, and science-based analysts now believe, for example, that we can waste precious potable groundwater or surface water here on no net benefit to the community mining. See my # 4. The question for the responsible government decisionmakers (and, if the decisionmakers get it wrong like the DEIR, the courts and/or our political voting power, as described in my # 3.N) is this: if it was your home, community, and environment at risk, would you decide today, based on all the credible facts, science, and information available today, to approve this project? Also, if you had to sell your property above or around the 2585-acre underground mine, what could you tell your buyer about all this?

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Those thousands of us directly affected locals (who far outnumber the small number of new job mine workers from who knows where) decline to consent to being burdened, harmed, and at risk of many other adverse impacts by this 24/7/365 mining for 80 years for all the reasons stated in this and other objections. Why? Among other things, we object, because it is wrong and worse to assume, as the disputed DEIR seems to insist our government decisionmakers do, that such future "new normal" periods will be the same as what the DEIR says about the water, air, toxins, and even mining data from the past, before the **mine closed in 1956** (DEIR at 4.7-2) and flooded with water to obscure any changes over that time.

Consider the key groundwater "recharge" or "balancing" examples from my #'s 3.A, B, E, and M and 5, where the DEIR falsely assumes that the mine can "dewater," draining vast amounts of our shared groundwater 24/7/365 for 80 years based on another erroneous assumption that our future rainfall will match the average between 1967—2017. See my water rebuttal details at my #'s 3.D, E, F, and 5. For example, **consider the following water related disputed DEIR data [and some of my bracketed counters] that not only incorrectly and confusing jumbles the NID data with groundwater data and the NID's Water Code provisions for its surface water with the mine's CEQA groundwater requirement, but even worse assumes the old past determines our future by ignoring the new normal of climate change for the DEIR mine's groundwater depletion (with some emphasis added in some quotes by capitals):**

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> **Projected Water Supplies.** Table 4.11-5 provides a summary of the District's projected supply entitlements [through 2040]. **[The relevance for this Objection in the following quotes lies in the unaddressed conflicts among NID's analysis of surface water supplies, since NID does not use groundwater, as discussed elsewhere. The DEIR's intensely disputed and, frankly, absurd, groundwater "recharge" and "balancing"**

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assumptions ignore climate change and credible science in order elsewhere in the DEIR to predict the future from the average rainfall between 1967 and 2017, instead of the "new normal" used by responsible scientists, governments, and businesses to predict a chronically drier and drought harmed future.]

Water Code section 10910(c)(4) requires that a WSA **[Water Supply Assessment, on which the DEIR mistakenly relies in cites throughout its disputed DEIR text regarding water and, therefore, misapplies the NID's different surface water supply standards, rather than CEQA and other relevant laws to this mine's imagined and disputed ability to recharge our local ground water the 2585-acre mine depletes and sends somewhere else downriver.]** include a discussion with regard to "whether total projected water supplies, determined to be available by the city or county for the project, in addition to existing and planned water demand associated with the proposed project...." Accordingly, the WSA addresses these three hydrological conditions through the year 2040 ... in Table 4.11-6. [The DEIR then purports to "summarize" "projected availability" from the District's existing and planned future supplies THAT DO NOT INCLUDE GROUNDWATER OR ACCURATELY ADDRESS THE MINE'S LOCAL GROUNDWATER DEPLETION AND RECHARGE, but instead focus on] ... the District's projected water demands in normal, single dry and multiple dry years throughout buildout. **As elsewhere, this compares "apples to oranges" since it is focused on the NID general service area demands from NID's surface water sources to rain recharging the massive groundwater depletion in one local area above and around the 2585-acre underground mine from 24/7/365 dewatering for 80 years, not the 20 years (or until 2040) NID uses for different purposes.]** As shown, demand within NID's service area is expected to exceed the District's supplies from 2025 to 2040 during Single Dry Years and in the first and second years of a Multiple Dry Year period from 2025 to 2040. **[This is confusing since this DEIR paragraph at 4.11-39 begins with a "20-year projection" and shifts to the 15-year period "from 2025 to 2040." Throughout this Objection I make reference to the DEIR's lethal flaw of limiting its perspective to this 2040 or 20-year cut off, as if somehow the DEIR were entitled either to ignore the last 60 or 65 years of its 80-year mining binge or, worse, perhaps incorrectly and without any evidence to assume that the whole 80 year period matches the first disputed 15 or 20 year flawed and misleading projections (or that what follows 2040 will be the same as what preceded 2040). For convenience and simplicity, I often just say "20 years" to avoid addressing this complexity and confusion every time. Since 20 years is better for the DEIR's disputed theory than 15 years, the DEIR advocates should not complain (but somehow, I expect they will anyway.]**

Factors contributing to inconsistency in NID's water supplies include legal limitations due to water rights and contracts limiting the quantity of water available to the District, environmental constraints, and reductions in availability due to climatic factors. The surface water supply to NID is subject to reductions during single and multiple dry years (seasonal and climatic shortages). ... **[These same kind of limitations apply with equal and often greater force to the existing and future competition for groundwater above**

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and around the 2585-acre underground mine by locals like me, as demonstrated elsewhere in this and other Objections (see my #'s 3.E, F and M and 5), but the DEIR inconsistently ignores any discussion of our groundwater rights' disputes and mine limits, except for a distracting and disputed discussion of the 30 or so wells along East Bennett Road. Since the DEIR recognizes some of these factors here (with even a rare mention of "climate"), why not address these matters where readers would expect them? The answer to that may be that the mine advocates recognize that, once informed adequately of the DEIR's real water burdens, risks, and harms, DEIR or mine approval would trigger competition and legal and political disputes with us locals over groundwater (and, during expected shortages, NID surface water) as to which we have at least equal, if not superior, rights.]

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Water Supply Sufficiency. Pursuant to Water Code section 10910(c)(4) and based on the technical analyses describe in the WSA prepared for the proposed project, the total projected water supplies determined to be available for the proposed project during Normal water years during a **15-year projection** would meet the projected water demand associated with the proposed project. (emphasis added) **[Again, this incorrect general conclusion appears to be a "bait and switch" as above, since that WSA etc analysis is focused on NID general supplies from surface water; and not on the disputed recharge or "balancing" imagined in the DEIR to our local groundwater from mine depletion from dewatering 24/7/365 for 80 years during a time when the old "normal" of the DEIR (eg, average rainfall between 1967 and 2017) no longer exists in the "new normal" of climate change, unprecedented dryness and drought, and greater competition from us locals accessing their own groundwater rights with new or deeper wells from above and around the 2585-acre underground mine. While we also dispute the sufficiency of NID supplies to the mine for no net benefit to the community (eg, my # 4), as described elsewhere here, the above discussion and others in this Objection demonstrate the errors, omissions, and deficiencies in this DEIR.] ...** Therefore, [with the DEIR incorrectly referring to NID's "projected 2040 water demands" as to the 30 East Bennett Drive property connections, as if that were the only DEIR 2585-acre underground project impact, a claim contrary to many parts of the DEIR I address] NID would be able to serve the proposed project in addition to existing and planned developments with some reliance on demand reductions in dry years by 2025. **[This erroneous and unsupportable conclusion is contrary to the DEIR itself, although it seems to admit that even the portion of the water use admitted here is admitted requiring "some reliance of demand reductions in dry years by 2025," which means that applying better information with a more scientific, fair, and appropriate analysis would reveal bigger shortages.]**

[Besides what DEIR calls a Normal Year, Table 4.11-5 actually admits at 4.11-40:] "Potential Surplus (Deficit)" [for] "Single Dry Years" [of progressively increasing deficits from 2025 to 2040 in acre feet/year] [for] "Single Dry Years" [ranging from]

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[negative] 85,629"/"48%" "Percent Shortfall of Demand" to "-98,814"/"52%" "Percent Shortfall of Demand", [as well as more deficient years for Multiple Dry Years]. ... [DEIR quote continuing at 4.11-42] Water demand within NID's service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period. **[That ignores many realities of increased DEIR water use, because, instead of 30 wells along East Bennett Road, the reality will be hundreds of our locals' competing wells just in the areas above and around the 2585-acre mine as we locals combat climate change and drought as well as the mine's groundwater depletion, as I explain elsewhere. See, eg, my #' 3.E, F, and M and 5. If the DEIR advocates or NID imagine that they can stop that our competition with our new or deeper wells, a common response to chronic drought which has occurred already all over the state where water supplies are already insufficient, then they do not appreciate the political and legal ferocity of such locals defending their homes, their forests and environment, and their community way of life from the no net benefit mine's massive depletion and disposal downstream and other waste of our shared groundwater. See my # 3.N discussing how us thousands of local voters can reform the laws and change officials to accomplish our worthy defenses, even independent of other legal remedies. The indisputable reality is that few, if any, of us thousands of affected locals will be willing to sacrifice anything for the benefit of this undesirable mine. See my # 4.]** However, this project is not expected to exacerbate NID's water supply shortages during dry years and the project will supply water into the South Fork Wolf Creek and into the NID conveyance system, at volumes exceeding the project water demand for potable water from NID. **[Even if that were true, which we dispute, it means little to those of us living above and around the 2585-acre mine who are losing our groundwater to that mine dewatering waste for someone else downstream. Moreover, on the merits, why would NID allow its system to be polluted by mine water from Wolf Creek that, even if correctly treated without human error or storms (which treatment quality many would decline to trust to this DEIR for 24/7/365 quality for 80 years, when it comes to their families' health and the use and value of their homes), no one wants even to accept even the level of hexavalent chromium and other mine water toxins that some industry influenced bureaucrat standards official may consider tolerable.]**

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*** This project would be subject to any applicable water demand cutbacks during droughts, like other NID potable water customers who are served by NID. **[However, the DEIR mine project can then be also expected to increase NID customer demand in years when their wells have deficient supplies, and none of that predictable defensive conduct is addressed in the DEIR or by NID, perhaps in the case of NID, because the managers do not expect the coming policy changes from us local voters to assure that they do not suffer from water wasters like this mine. See my # 3.N. The future will increasingly become what some politely call "competitive," but what (more accurately) is about us thousands of local voting residents insisting on our legal and**

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political rights to our priority share of surface and ground water over less beneficial uses, especially no net benefit uses like the mine. See my #'s 3.N and 4.]
*** (DEIR quote at 4.11-43) Thus, **a less-than-significant** impact would occur. **[That incorrect and disputed DEIR conclusion does not follow from the analysis that is rebutted above and elsewhere in this Objection and others.]**

What is the net to remember from that analysis, which I admit is confusing because it's matching the DEIR's "bait and switch" and "apples vs oranges" tactics confusion? The lesson here is that the disputed DEIR wants us incorrectly to join them in the illusion that we can safely assume the past average wet years from 1967 to 2017 will be repeated from now through 2040 (or sometimes they say the next 20 years), despite the DEIR ignoring our climate change drier and drought future. Worse, the DEIR then next assumes that same rainfall "recharge" of our groundwater will continue for the rest of the 80 years of mining with no proof or analysis or legal excuse at all; just apparently a disputed and meritless theory that the future after 2040 is too "speculative" to consider, so, therefore, they are somehow allowed to act as if they were a public water district following the Water Code reporting rules for timing, instead of what the mine is: a no net benefit private, exploitive, speculator business operating for the benefit of largely foreign investors. The DEIR cannot transfer to us locals the risk of any such unknowns, whether about groundwater, surface water, toxins, air quality, or any other factors that make this mine a risk menace, especially since we have our own competing contrary surface ownership rights above and around the mine to protect in competition with whatever the mine does with any shared resources like water or air, not to mention the right to prevent tortious harms to our health by water or air pollution.

Also consider the illusion is exposed in the DEIR "Conclusion" at 4.11- 51, where it incorrectly states: "Water supply exceeds existing and projected future demand, including the addition of the Idaho-Maryland project, during normal years. Therefore, sufficient water supply is available to service existing and future reasonably foreseeable development during normal years." First, the second sentence does not follow in science or fact from the first sentence, even if one were to look realistically only at the next 15 or 20 years (or until 2040), as distinguished from what is reasonably foreseeable for the next 80 years of DEIR mine operations. Second, what they call a "normal year" is incorrectly based on history (see where the DEIR looks at the average rain from 1967 to 2017 and ignores the "new normal" of climate change and chronic dryness and drought.) Third, the dry and drought years are the "new normal," and there are admitted water shortages that will be worse than admitted by the DEIR, as sort of admitted in the next paragraph where the DEIR partly contradicts itself, although the DEIR still ignores the fact that there will also be competition for groundwater (eg, from new and deeper wells) and for NID water, not just with desirable newcomers who we would like to welcome to our community instead of this no net benefit mine (see my # 4), but also the thousands of us existing residents and voters living on the surface above and around the 2585-acres of the underground mine who have their own competing legal rights to such groundwater and NID water. The DEIR ignores the reality of future water shortages and competition, but reality will expose that obvious error. Then what? See my Objections

versus the DEIR's only admitted but insufficient statement of what happens when the mining stops at its 4.3-103-04.

The disputed DEIR quotes and positions addressed in the previous paragraphs, especially at 4.11-42-43 and 51, have the same flaws as the disputed DEIR "Conclusion" admissions at 4.11-51 as follows, (but they seem inconsistent with them as well): "Water demand within NID's service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year period." Reality will likely be much worse, but even that admitted shortage will create problems more than what the DEIR addresses, especially if one excludes the speculation and errors and adds what the DEIR omits adequately to address. For example, there is no satisfactory and sufficient basis for the DEIR's sheer speculation to conclude what so ignores that hard contrary issues **at DEIR 4.11-51 that: "This supply deficit can be addressed through NID's previously discussed Water Shortage Contingency Plan, and as previously mentioned, the proposed project would be a net contributor of water the NID system" (which, as noted, does nothing for those thousands of us living and using above and around the 2585-acre underground mine whose water would be exported down river somewhere else with whatever hexavalent chromium, other toxins, and other problems it may contain). See, eg, my # 3.N when the mine starts to compete with us locals during water shortage, and we counter compete in a context where no one has any interest in sharing with this no benefit mine that remains a threat to everything we love about our community and everything we have invested in our homes the mine is devaluing.**

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Science and rational, informed people would make the reasonable and rational decisions today, based upon the much worse "new normal" reality that has begun and will only get worse over that 80-year period. Our future in this relevant local area is going to be painfully drier or worse weather, with frequent and chronic droughts from climate change, together with all manner of horrible side-effects like wildfire smoke that will cumulatively exhaust the outdated safety standards on which the DEIR insists we rely for the next 80 plus years. See My #'s 3.D, E, F, and 5, discussing adverse DEIR admissions and incorrect or misleading discussions and revealing omissions by the DEIR on these water and timing issues. Worse, as I address in my # 14 and my supplemental brief, the disputed DEIR fails to comply with CEQA and other applicable law by generally only looking backward to a nonpredictive past, and at most when the DEIR occasionally feels compelled to do so looking only at the next 20-years (or until 2040) of the 80 years they ask to mine, deplete our groundwater, and otherwise impact, risk, and distress our environment 24/7/365 to the detriment of our community, our devalued homes, and our health and welfare.

Incidentally, while its slightly tangent please notice where I elsewhere call the DEIR out for incorrectly considering the depletion of our local groundwater "balanced" because the mine supposedly treats our groundwater and sends it on down the Wolf Creek somewhere else in NID territory. That is worse than absurd. Wherever else that relocated groundwater of ours goes from our surface home groundwater source does nothing to recharge or balance our groundwater. Taking our groundwater (remember we locals on the surface above and around the 2585 acre mine have our own groundwater property rights we could use to drill wells to use that groundwater before it goes to the mine for removal somewhere else, as discussed in my # 3.N and elsewhere) to another NID destination is irrelevant to the harm caused to us here

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locally. This is the same kind of disproportionate wrong that the California Supreme Court called a nuisance and inverse condemnation in my # 4 discussion, except in that sewer plant case those downwind locals driven from their homes by smells were sacrificing for the common good of a public benefit project, whereas this private mining gamble has no net benefit to anyone in our community, even those at a safe distance away from the mine. See my #'s 4, 8 and 3.N.

N. Political Dynamics, Law Reforms To Protect the Community, And Consequences From Starting The Mining Before We Stop It And More Risks, Impacts, And Harms Occur, Even Some Admitted By The DEIR, Although, As Usual, In An Obscure Place at 4.3-103-04 Called The "Non-CEQA Related Analysis."

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This opposition to the mine is not a normal political dispute over ideology, political partisans, or other divisions that sadly disrupt our lives these days. This is about saving our property values, our water, forests, and environment, our health and safety, and our community way of life from a serious menace that has not even attempted in this disputed DEIR to engage us in a rational and appropriate discussion of our vast differences about the burdens, risks, and harms of the mine impacting us locals on the surface above and around the 2585-acre mine too often ignored in the disputed DEIR. (For example, a casual reader of the DEIR would think the only dry well issue is 30 wells along East Bennett Road, instead of the hundreds of other impacted wells now [and more coming] on the ignored surface above and around the 2585-acre underground mine depleting our groundwater.) That means we locals will have to organize and exercise not only our legal, but also our political rights to defend us from this menace and any copycat mining this mine may inspire, if the aggressive, exploitive "entrepreneurs" see that this County is willing to be exploited by such no net benefit mines. See my # 4. In the brief minutes allowed at the March 24, 2022, DEIR hearing more than 100 locals complained of such things, and I expect many will follow up with written objections, most of which seemed meritorious and all of which reflected the high, personal level about their reasons of concerns inspiring the many oppositions I expect and describe here. When I receive that transcript and those other objections, I request permission to supplement this Objection.

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This is not the forum to explain what all that means for the future or to debate the many defensive reforms and legal and political counters and other competitions that are desirable, except for one clarifying alert to our governmental decisionmakers. The mine advocates seek to distract us with a legal debate and disputes over CEQA technicalities (in which we will engage as discussed in my #'s 4 and 14 and my supplemental CEQA brief), but another defensive front involves law reform. The DEIR is so fragile that it admits at 6-14 (as I quote above) that the mine would likely not be economically feasible if it only operated continuously 12 hours a day, instead of insisting on the special and undeserved 24/7/365 operations for 80-years that our governments generally do not even allow our existing desirable businesses to operate. That means government cannot and should not allow the mining to start, since it will soon stop for many reasons, even just reality and lack of funding as described in my #2, but including because of local or state law reforms, such as stopping

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mining at 12 hours a day in such suburban areas. I say that not as a threat, but as a means of reducing the adverse consequences for us locals of starting and stopping this mine (see the previous subsection on that topic and even what parts the DEIR admits at 6-14.)

FOR THE RECORD, NOTHING IN THIS OBJECTION SHOULD BE INTERPRETED AS A THREAT THAT I OR ANYONE ELSE WILL SUE RISE OR ANYONE ELSE, SINCE IT IS PREMATURE TO MAKE THAT KIND OF COMPLEX DECISION AND ANY SUCH PREMATURE LEGAL ACTION WOULD NOT BE "RIPE" YET AS A JUSTICIABLE CAUSE OF ACTION. A DISCUSSION REACTING TO SOMEONE'S THREATENED FUTURE CONDUCT BY IDENTIFYING OBJECTIONS AVAILABLE FUTURE REACTION OPTIONS IS NOT A THREAT TO EXERCISE THOSE OPTIONS. FOR EXAMPLE, THIS IS ONLY A DRAFT ENVIRONMENTAL IMPACT REPORT THAT MUST GO THROUGH A COMPLEX PROCESS BEFORE THE MINING STARTS, AND MANY IMPROVEMENTS AND REFORMS ARE POSSIBLE THAT MAY REDUCE THE NEED FOR SUCH LOCAL SELF-DEFENSE FROM SUCH FORESEEABLE DEIR/MINING BURDENS, RISKS, AND HARMS. THE REASONS FOR THIS OBJECTION COUNTER DISCUSSIONS OF POSSIBLE REACTIONS AND DISPUTE REMEDIES INCLUDE TO EXPLAIN WHY, IF IT PROCEEDS, THE DEIR NEEDS TO BE REDONE TO CORRECT

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ERRORS, OMISSIONS, AND OTHER DEFICIENCIES. The reasons for the urgent or strong commentary about local reactions now is that history of such conflicts shows what could follow involving legal, political, and competitive self-defense possibilities that have commonly occurred in such situations, which discussions reflects a desire to assure that the DEIR advocates and decisionmakers (i) take our local concerns seriously, (ii) improve the next version of the DEIR, if any, and (iii) address more comprehensively and appropriately the local issues and concerns in this and other objections, including all those appropriate concerns voiced at the March 24, 2022, County hearing. What we want is peace and the status quo. What this Objection also does, as lawyers do, is to correct the DEIR on some of its many disputed express and implied legal assertions and illustrate the need for technical reforms in the DEIR and mining by reporting about the litigation, political, and competitive options from other such unrelated mining and environmental approval disputes with some similar circumstances. In other words, the goal of this Objection is to reduce in advance the issues in dispute here for our common good, rather than just to combat problems in appropriate ways after the mining begins and the burdens, risks, and harms become actual instead of theoretical.

Consider, for example, that continuous 12 vs 24-hour operational dispute that the DEIR mine says (at 6-14) it cannot economically survive. See my #2, which exposes the real problem is not the 12 hours as much as the weak financial condition of Rise admitted in its current SEC Forms 10K and 10Q and shown by its own accountant's "going concern"

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qualifications on its (at best) unimpressive financial statements. The same political and policy reasons we do not allow other businesses to operate 24/7/365 apply with even more force and reasons to this no net benefit mine. See my # 4. If the existing laws and court injunctions do not save us local from those burdens, risks, and harms from such 24/7/365 operations for 80-years, then we (directly or through right-thinking elected officials) may limit all such undesirable, large scale mining close to such significant inhabited communities to the same hours we restrict desirable businesses. Consider that many disruptive activities are limited in operations for the protection of locals; eg, road repairs are done at night to avoid traffic problems during the day. Consider that the stresses on our environment from mining can be

moderated by reducing hours of operations; eg, groundwater recharge can happen better from 12 hours than 24 hours of depletion. There are scores of such law reforms possible, and I expect that they will become very popular with us locals. So also, might be laws requiring sufficient, high rated liability insurance coverage, surety bonds, and other protections for mine victims, especially for reclamation at the end of the mining. [As a bankruptcy and insurance insolvency lawyer who once liquidated the nation's leading insurance/surety company issuing mining and other surety bonds, I doubt that a company with the financial condition and circumstances I describe in my #2 and Rise admits in its 10K and 10Q could obtain sufficient reputable coverage, if any at all, at any economically rational price. That should give government decisionmakers pause, because by approving the DEIR they would be assigning to this resisting community risks that any sophisticated and qualified insurer would reject on the merits. Note: with insurance/surety exposures on needs quality California admitted insurers because there are many offshore insurance frauds selling bogus policies through surplus lines brokers. (For just one of many examples, unless it's changed since then, consider my State Bar pro bono project years ago, when most of the local LA businesses were defrauded by a no asset Turks & Caicos insurance company, which was unregulated and had purchased its insurance license for a nominal fee and was unable to pay any fire and other policyholder claims after the Rodney King riots.)

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Consider who wants to vote against defensive initiatives imposing safer practices and operating rules on undesirable mines like this seeking the right to blast, dig, dewater, and otherwise create noise, vibrations, toxic safety hazards, water depletion and waste, and other disturbances, risks, and harms all day and night beneath or near thousands of people already living above or around that underground mining. The surface residents and voters should not have to limit their response to what rights they may win in court in such competition with the underground miners, since the law allows voters to improve the laws regulate such activities in scores of additional ways, either directly or through reform minded officials they elect.

While the mine (like others before it) may attempt to argue that somehow such new regulations and laws reducing its profits are "eminent domain" "takings" or otherwise barred by its constitutional rights, that meritless theory has long been rejected by the US Supreme Court and others, both on that legal and because us surface owners also have our own competing property rights that merit protection from the competing underground rights. Consider the leading such Supreme Court decision of *Keystone Bituminous Coal Ass'n v. DeBeneditis*, 480 U.S. 470 (1987), where the Court upheld against a coal miner challenge the Bituminous Subsidence And Land Preservation Act (the Subsidence Act as it's called in Pennsylvania and many places where it has been replicated), where mining was limited to prevent "subsidence" (the loss of surface lateral and subjacent support and loss of groundwater or depletion of surface water, which are legal rights we surface residents already have here, but it helps to have more laws to detail specific applications and thereby avoiding the need for expensive defense litigation). That Supreme Court decision defined the "subsidence" concerns (also equally at issue for this DEIR project, especially because of the massive and objectionable groundwater depletion and [even what's so far revealed of] the DEIR's new, deeper, and expanded DEIR blasting, tunneling, rock removal, and other mining activities) as follows (at 474-5):

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Coal mine subsidence is the lowering of the strata overlying a coal mine, including the land surface, caused by extraction of underground coal. This lowering of the strata can have devastating effects. It often causes substantial damage to foundations, walls, and other structural members, and the integrity of houses and buildings. Subsidence frequently causes sinkholes or troughs in land which make the land difficult or impossible to develop. Its effect on farming has been well documented—many subsided areas cannot be plowed or properly prepared. **Subsidence can also cause the loss of groundwater and surface ponds.** In short, it presents the type of environmental concern that has been the focus of so much federal, state, and local regulation in recent decades. (Emphasis added). [That conclusion about groundwater has a fn 2 which states:]

Fn2. "Whenever [subsidence effects] extend, damage can occur to buildings, roads, pipelines, cables, streams, water impoundments, wells, and aquifers. Buildings can be cracked or titled; roads can be lowered or cracked, **streams, water impoundments, and aquifers can all be drained into the underground excavations**. Oil and gas wells can be severed, causing contents to migrate into underground mines into aquifers, and even into residential basements. Sewage lines, gas lines, and water lines can all be severed, as can telephone and electric cables. ... (emphasis added).

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While that subsidence law generally required 50% of the coal to remain for support in strategic places, it did many other things to protect the surface and limit the mining, explaining that the government was entitled to so act "to protect the public interest in health, the environment, and the fiscal integrity of the area," such as by "exercising its police powers to abate activity akin to a public nuisance," although the court made clear that the police power was broader than nuisances. (At 488) Of special note, the Court (at 493-94) noted that this challenge was to the enactment of the law before it was enforced, and that meant that it was premature to complain about how the law might be abused, when the facts of that surface and underground mining competition of rights were not yet established. Citing its own precedent in Hodel v. Virginia Surface Mining & Reclamation Ass'n Inc, 452 U.S, 264 (1981), the Court explained:

"[The] court ignored this Court's oft-repeated admonition that the constitutionality of statutes ought not be decided except in an actual factual setting that makes such a decision necessary. [citations omitted] Adherence to this rule is particularly important in cases raising allegations of an unconstitutional taking of private property. *** (at 497): [W]here an owner possesses a full 'bundle' of property rights, the destruction of one 'strand' is not a taking because the aggregate must be viewed in its entirety. [The Court then followed that discussion how valid zoning laws always affect without any "taking" property uses with things like setbacks, lot size vs building size, etc.]

While the "taking" legal issues could be debated by lawyers at length, this is not the place for that, and, unlike in that Supreme Court case where surface owner had signed waivers in favor of the underground mining, the reverse is clear here, as demonstrated by my discussion

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of the deed limitations and absence of surface waivers, as admitted by Rise in its SEC Form 10K. I do note, however, that the California Courts have upheld such surface owner protection laws against underground mineral rights or other uses, such as in California Civil Code section 848(a)(2), upholding such surface owner protections challenged by oil and gas miners. *Vaquero Energy, Inc. v, County of Kern* (2019), 42 Cal. App. 5th 312 (including among protections some delegations of power to surface owners, depending on Tiers classified by the extent of current mining domination vs competing uses dominating the area and many other interesting ideas, involving notice requires, 120-day delays of mining etc.). The point here is that there are many things our local government can and should do by enhanced legislation (or, if need be, by initiatives) independent of any CEQA or other screening or permitting as to this mine, to further protect us residents and voters above and around the 2585-acre underground mine from the kinds of concerns expressed in this and other objections. While the mine could attempt to challenge such new protections for our community, they then expose themselves to a whole different type of litigation than the usual CEQA fights. In those kinds of disputes, the surface owners have many practical and legal advantages, while the miners are exposed to having to defend what seems to me to be indefensible mining positions under the circumstances and to answer all the hard questions (eg, my #'s 14 and 15) and expose all the data missing from or evaded in the DEIR. As my # 14 explains, many of us have a different interpretation of CEQA and other laws to apply in this situation.

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As noted in the financial discussion in the prior section 2 of this Objection, a question arises for such legislation and initiatives about controlling who is actually doing the mining versus to whom the mining permissions are granted. For example, if Rise were granted the mining opportunities it seeks in the DEIR, and, then still lacking the funding to mine itself, leased the mine to an unsuitable miner tenant for a share of the profits and other compensation, we could suffer more unhappy surprises from the new miner tenant. Indeed, one tactic used by this others in this mining industry for reducing government scrutiny and regulation generally is when a mine owner so leases the mine to another even more unsuitable and safe operator-tenant for a share of the profits and other compensation, and then the tenant does the bad things we worry about, and then the landlord claims (under older and under these distinguishing circumstances disputed case law, as to which there are important exceptions) that the landlord miner is not liable for the often then bankrupt tenant's wrongs, as in cases like *Butte Copper & Zinc Co. v. Poaque*, 164 F.2d 201 (9th Cir. 1947). See my # 4 and 14. Legislation or initiatives that could improve our surface owner and user defenses against such abuses, if any such things were attempted here. (Again, I have no idea what this particular miner intends to do, but responsible government mistakenly allowing such 24/7/365 mining needs to ask the appropriate questions and protect us surface owners and users above and around the 2585-acre mine from any such possible risks.)

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4. There Is No Net Benefit To Justify Approving This Mine Or It's DEIR, Especially When One Gives Appropriate Weight To The Objections Of The Burdened And Harmed Locals At Risk Of Worse.

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A. A General Discussion of Some of the Many Negatives Decreasing Any Imagined Benefits From the Mine, Applying Some Legal And Political Self-Defense Rights And Counters Expected From Those Of Us At Risk Living Above Or Around the 2585-Acre Underground Mine.

There can be no net local benefit from this mine to Nevada Country, even if the DEIR were correct, which it is not. As Rise admits in its SEC form 10K and 10Q and as explained in my # 2, it is speculative to even imagine what part of the DEIR plan Rise even has funding sufficient to accomplish that it considers benefits. That "no net benefit" analysis is especially true if one focuses on the thousands of us who live on the surface above and around the 2585-acre underground mine, who are generally ignored by the DEIR, in its erroneous pitch to consider this CEQA "project" generally as if it were only the small Brunswick Industrial Site and 30 or so well properties along the East Bennett Road (and, although the DEIR incorrectly describes it as a separate CEQA project, the Centennial Industrial Site). That is all one CEQ project that cannot be separated with CEQA discussions limited to just one part. As this Objection demonstrates, the greatest weight must be given to us locals above and around the 2585-acre underground mine, who could suffer many of the greatest negative impacts. Any

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DEIR decisionmakers who may like distant mines that are too far away to cause them personal burdens or risks, should especially consider the contrary leading precedent against uncompensated disproportionate impacts: ***Varjabedian v. Madera*** (1977), 20 Cal.3d 285 (relying on the Fifth Amendment holding in *Richards v. Washington Terminal Co.* (1914), 233 U.S. 546, and noting that our California Constitution offers us even broader protection than the US Constitution), involving for our discussion purposes here both successful nuisance and inverse condemnation claims (among other claims) of local homeowners against the City of Madera's approved sewer treatment plant. **That court upheld the jury's damages award that was not just for the stink nuisance harms suffered by the downwind locals, but also for the loss of real estate value measured** (at 291) by "the difference between the present fair market value of the property as the same would have been without the construction of the sewage treatment plant... and the present fair market value after said plant was constructed and put into operation." The court rejected all the usual defense arguments that a mine owner might be expected to attempt. **As the Court stated (at 298): "If a plaintiff can establish that his property has suffered a 'direct and peculiar and substantial burden as a result of the recurring odors produced by a sewage facility -- that he has, as in *Richards*, been singled out to suffer the detrimental environmental effects of the enterprise—then the policy favoring the distribution of the resulting loss of market value is strong ... and the likelihood that compensation will impede necessary public construction is slight. ... and a burden unfairly and unconstitutionally imposed on the individual landowner." See my #'s 3, 8, and 14.**

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Some our local concerns should also be of broad concern to others in the County who may imagine they are too distant to be harmed by this mine. For example, the groundwater dumped into the Wolf Creek from the mine's wasteful dewatering goes somewhere else downstream, where those citizens should share our worry about hexavalent chromium (see my #'s 3.C, G, and H, and 7). While the depletion of our groundwater in ways that add to our mine related miseries (see my #'s 3.D, E, F, and M, and 5) may seem local under the disputed DEIR analysis of our fractured rock aquifer system, the drying out of our surface and its forests by

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such wasteful local groundwater mine depletion and mine NID uses (without the illusory "recharge" incorrectly assumed in the DEIR) harms everyone in this "new normal," zero sum game of climate change and chronic drought and dryness impacts. Because there is not enough water for everyone in the future, we're all in competition for an insufficient supply. See my # 3.N. Also, because the consequent fires and smoke and other air quality threats are not locally contained, even those with sufficient water will end up sharing those adverse consequences of this mining. See m #'s 3.J and 10. Those and other problems addressed in this Objection and others need to be placed on the negative side of the balance sheet to compare against the minor alleged benefits of the mine debated at the end of this section.

I cannot imagine us locals (once adequately informed of the realities and the errors, omissions, and deficiencies of the disputed DEIR) accepting the mine, especially when presently less informed people discover "the hard way" the burdens, risks, and problems which the DEIR was required to disclose and failed to do so satisfactorily. See my #'s 14 and 15. Thus, we hope the County and others (with whom we do not wish conflict) do not choose the wrong side of this foreign mine operator against their existing citizens and voters resisting until all appropriate practical, legal and political options have been exhausted to defend their homes, our water, safety, and other environmental factors, and our community. See my # 3.N. It should be easy for our governments to avoid conflicts with their voting citizens on this mine because this mine is unlike most other such conflicts in the case law. Often the challenged CEQA projects involved **public improvement** projects needed by the broader community that hurt smaller impacted groups of citizens, like roads, sewer plants, or other public improvements. Here, this private exploitive mine has no such material net public benefit. From its readily available information quoted or explained in my #2, Rise seems to be just a private, mostly foreign, speculative business seeking to impose itself on our local community for the profit of mostly foreign investors with little comparative net benefit to anyone in Nevada County, beside some mine workers from unknown places, whose small numbers are dwarfed by the thousands of us voting and tax paying neighbors and others living in the community impact and stigma zones, like mine above and around the 2585-acre mine. Be clear, this is not just citizens worried about local burdens, harms, and risks that someone can resolve by some DEIR policy debate. There is little doubt that our real estate values (like local tax revenue and tourism) will suffer, even from the stigma of the mine, because, even if we somehow were all wrong about all the mine related problems (which we're not), no one wants to pay these kinds of real estate prices to acquire such burdens, risks, and harms. See the transcript (when available) of the March 22, 2022, County hearing and those objectors' follow up written comments. Clearly, no government blessing of the DEIR or mine approval will convince anyone at risk in such impact zones above or around the 2585-acre mine (or any buyer or mortgage lender/appraiser) to accept such risks for no benefit to their community. So, sadly, approval of the DEIR and mine would divide our County in one additional way, and I hope that is not our fate. For our county, our state, and our country to succeed and prosper, we need to be able to come together again, despite our differences. However, to do that we need wise, effective, and responsible government that must be responsive to its citizens, or us voters will improve our representation and our applicable laws. See mt # 3.N. Approval of the DEIR and mine would just drive us further apart, and for what? Certainly not for the trivial and often illusory benefits promised by the mine DEIR

that the miner apparently cannot afford (see my #2) and that are also discounted at the end of this discussion.

I mention the ***Varjabedian v. Madera*** nuisance claim, not just because such claims (if and when presented) would further affect the economics of the mine and other issues, if and when any victims were to collect the nuisance evidence and consider the time to be right for accountability. **My primary reason for focusing on this *Varjabedian* case is the court's discussion of why disproportionate harm suffered by some locals cannot be justified by the benefits to others more distant who can escape that harm**. Those cases (and many others) may create problems for the County in situations like this one, if it were to impose a nuisance (among other things) on such particular victims, like the downwind ***Varjabedian*** homeowners, as a "taking" under the Fifth Amendment and under the California Constitution, potentially creating claims against both the private nuisance maker and the approving governmental authority. See, eg, *Uniwill v. City of Los Angeles (2004)*, 124 Cal. App. 4th 537 (a private party, here a private utility, and an approving governmental authority can be jointly liable in inverse condemnation for depriving a victim of property rights). As that ***Varjabedian*** Court stated (at 298): "If a plaintiff can establish that his property has suffered a 'direct and peculiar and substantial burden' as a result of the recurring odors produced by a sewage facility -- that he has, as in *Richards,* been singled out to suffer the detrimental environmental effects of the enterprise—then the policy favoring the distribution of the resulting loss of market value is strong ... and the likelihood that compensation will impede necessary public construction is slight. ... and a burden unfairly and unconstitutionally imposed on the individual landowner." This policy to avoid disproportionate local harms should be especially powerful here, where the mine is not a public improvement for the common good, but rather a private exploitive business of no net benefit to the public.

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More importantly, we are not just talking about intangible issues like smells (although noise, traffic, air quality margins, and other intangibles may also arise in disputes, especially since this no net benefit mine is to be granted 24/7/365 operating approval that few of our more beneficial local businesses enjoy as far as I know, without any justification in the disputed DEIR for such continuous operation except the arbitrary profit margin desired by Rise and its foreign owners) or on account of Rise's admittedly weak financial condition discussed in my # 2. Here the conflict includes our groundwater depletion and hexavalent chromium pollution of commonly owned groundwater, as well as potential interference with the legal property rights of surface owners above and around the 2585 acre mine (eg, for subjacent and lateral support, etc.) With our water table dropping in the climate change future of dryness and drought, the last thing we need to risk trees dying and becoming bigger fire hazards is that 24/7/365 dewatering for 80 plus years and admitted 1.4 million gallons a year NID depletion uses at the mine, plus more addressed in my #'s 3.D, E, F, and M and 5. Stated another way, all of us locals impacted by the mine are being asked to sacrifice some of our water, health, property rights and value and other things mentioned and all grossly understated in the DEIR, but for what? So far, the only credible answer seems to be for a speculative and dangerous private project to export profits to private investors across the border enjoying their exploitation of us locals, while we suffer those disclosed problems, plus far greater undisclosed burdens, risks, and harms only revealed as cited errors, omissions, and deficiencies in the disputed DEIR.

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In considering the scope and nature of any mine approval and its terms and conditions, the government decisionmakers should consider both the nuisance and inverse condemnation court decisions as flip sides of the same coin. (Note: As explained in US Supreme Court cases in my # 14 and elsewhere, when a government creates or approves a nuisance by a **public** project [like that sewer plant] it is exposing itself to inverse condemnation liability. When a private company does anything that would be such an inverse condemnation if done by a government, then the private company should have equivalent nuisance liability with similar consequences and considerations. That is why I discuss both public and private nuisance and inverse condemnation cases together, for illustration of the common principle they both have that no one can use their property to damage or harm other properties in actionable ways without consequences.) The damages and "taking" (eg, eminent domain or inverse condemnation) consequences in "taking"/inverse condemnation cases can be similar when a nuisance is imposed on local victims. For example, consider *County of San Diego v. Bressi* (1986), 184 Cal. App.3d 112, where an aviation easement was imposed on homes at the end of a runway with approval authorized for hugely abusive (although unlikely) uses (such as not only jumbo jets, but also "any other contrivance yet to be invented for flight in space.") See also *Coachella Valley Water District v. Western Allied Properties, Inc* (1987), 190 Cal.App. 3d 969 (where the court ordered a retrial where the trial court mistakenly limited the "before condition" valuation damage expert's evidence about the value before impacts of the flood control alternatives if they varied from the government's desired plan, holding the jury was entitled to consider the value of the plaintiff victim's property without being limited to the defendant's idea of solutions or consequences of doing things the defendant's way.) The *Bressi* court rejected the defense that the government should only have to pay for the less burdensome current uses (ie, only small private planes versus jumbo jets and rocket ships in the permits), holding that "just compensation" to the homeowner is measured (like nuisance damages) based on what the owner has lost, rather than by what the taker has gained. And stated (at 123) that: The jury ... must "once and for all fix the damages, present and prospective, that will accrue reasonably from the construction of the improvement and in this connection **(the jury) must consider the most injurious use of the property reasonably possible. ...In determining the most injurious use of the property reasonably possible, the jury must consider the entire range of uses permitted under the resolution of necessity." (ie, in that case making a small airport into a hub for first jumbo jets and then spaceships.)** (Emphasis added) Thus, if a dangerous or risky mine were allowed such great powers for massive abuse 24/7/365 for 80 years, any liability would be calculated on that worst case basis. That means current nuisances, trespasses, and other torts that have modest current impact can become a huge liability because that current harm can be multiplied for 80 years' impacts.

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Therefore, to the extent that us locals suffer damages, the county is better off with the narrowest approval imaginable, not the worst (or something vague that the DEIR could exploit with loopholes for which there is then maximum possible exposure with the 80-year multiple.) The government authorities should also consider making any approval not include hexavalent chromium, not allowing 24/7/365 operations (eg, versus the normal 12 hours) for 80 plus years (but at most the limited period for which they have reliable data, which could never exceed 2040 as the outside date for which the disputed DEIR offers even deficient data on limited topics, especially not extending any period allowed based on some assurance of achieving some

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arbitrary profit margin), not allowing such unlimited depletion of our groundwater based on a disputed and preposterous recharge fantasy ignoring climate change dryness and drought, and not allowing other burdens, risks, and harms to us locals and our property rights. That means any approval which is granted (and I urge that none be granted) must be conditioned on such credible protections for the locals from all such burdens, risks, and harms, especially where the disputed DEIR lacks reliable data and just assume the future will be the same as the past. Otherwise, someone may have to pay us not just for current suffering, but also for the risk for future, "worst case" suffering for 24/7/365 for 80-years, as noted above, even if the mine has no funds or ability to operate that long.

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Besides such damages for nuisance and other claims, victim locals in such disputes can also entitled to recover (eg, restitution) costs of mitigating the victims' damages for any nuisance and inverse condemnation. Eg, *Ahlers v. County of L.A.* (1965), 62 Cal.2d 250 (when road construction causes landslides, the threatened property owners are entitled, among other things, to recover the cost of minimizing their damages in good faith, as by installing 25 shear pin caissons to try and hold back the landslide); *Sheffet v. County of L.A.* (1970), 3 Cal. App.3d 720,741-42 (water diversion damages from subdivision and road entitle victim to mitigate his or her damages in good faith and recover the cost of protecting his or her property). While it is premature to address the mitigations cost recoveries from many defensive strategies local victims could elect to protect their properties from the many burdens, risks, and harms that anyone may suffer from a mine like this, one hypothetical example could be that the locals individually or collectively sink their own competing wells into their owned groundwater beneath their properties above and around the underground mine, hoping to save their surface share) of groundwater otherwise lost by plans to dewater, treat, and flush such groundwater downriver in some disputed but depleting amounts. See my #'s 3.D, E, F, M, and 5.

As discussed elsewhere, one likely such hypothetical scenario where such defensive victim mitigation of damages could occur is where (i) there is a local water shortage from the chronic droughts and dryness from the climate change that the disputed mining plan and environmental impact report entirely ignores without any satisfactory discussion (see also, for comparison, my # 3.M, explaining how the DEIR erroneously predicts the future to be the same as the nonpredictive past), and (ii) the local water company has insufficient water for such locals, because it is short, whether by its own shortage problems or because of government reallocations to more desperate places. In such cases, such locals could compete for their own groundwater in accordance with applicable law, as is their right (and as new construction on neighboring land would do), even when they are surface owners above the underground mine that is wasting precious groundwater on less important dewatering and other mining uses. Nothing in the DEIR addresses such potential competition or any of those risks, problems, and conflicts during the next 80 years, dismissing such ideas as "too speculative," but what is even more "speculative" and unsubstantiated is the disputed DEIR just assuming (without any satisfactory evidence) that there will be no local resistance from such surface owners to the depletion of their ground water 24/7/365 for 80 years without the already resisting locals exercising their defensive rights, including to compete for their own groundwater before it's all gone. It would be inappropriate for the governmental authorities addressing the mine approvals to do anything to prejudice our groundwater or NID competition or other rights by any disputed DEIR or mine approvals, especially because we locals contemplate law reforms

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going in the opposite direction of prioritizing our human uses over such private mining exploitation. See my # 3.N.

Other issues may also arise in such nuisance and inverse condemnation etc cases, some of which are analogous to the risk of "subsidence" from this mine for those above and around it entitled to subjacent and lateral support, groundwater, and other rights. E.g., *Smith v. County of L.A.* (1986), 214 Cal. App. 3d 266 (county road repairs created landslide conditions destroying homes triggering nuisance, inverse condemnation, and other claims, including both damages for diminution in the value of real property, but also damages for annoyance, inconvenience, and discomfort, as well as mental distress as a part of the loss of enjoyment.) See also my # 14 or my supplemental brief, citing the Supreme Court and California cases allowing voters to protect surface owners from underground mining abuses. **For example, consider again the leading such Supreme Court decision of *Keystone Bituminous Coal Ass'n v. DeBeneditis*, 480 U.S. 470 (1987), where the Court upheld against a coal miner challenge the Bituminous Subsidence And Land Preservation Act (the Subsidence Act as it's called in Pennsylvania and many places where it has been replicated), where mining was limited to prevent "subsidence" (the loss of surface lateral and subjacent support and loss of groundwater or depletion of surface water, which are legal rights we surface residents already have here, but it helps to have more laws to detail specific applications and thereby avoiding the need for expensive defense litigation). That Supreme Court decision defined the "subsidence" concerns (also equally at issue for this DEIR project, especially because of the massive and objectionable groundwater depletion and [even what's so far revealed of] the DEIR's new, deeper, and expanded DEIR blasting, tunneling, rock removal, and other mining activities) as follows (at 474-5):**

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> Coal mine subsidence is the lowering of the strata overlying a coal mine, including the land surface, caused by extraction of underground coal. This lowering of the strata can have devastating effects. It often causes substantial damage to foundations, walls, and other structural members, and the integrity of houses and buildings. Subsidence frequently causes sinkholes or troughs in land which make the land difficult or impossible to develop. Its effect on farming has been well documented—many subsided areas cannot be plowed or properly prepared. **Subsidence can also cause the loss of groundwater and surface ponds.** In short, it presents the type of environmental concern that has been the focus of so much federal, state, and local regulation in recent decades. (Emphasis added). [That conclusion about groundwater has a fn 2 which states:]
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> Fn2. "Whenever [subsidence effects] extend, damage can occur to buildings, roads, pipelines, cables, streams, water impoundments, wells, and aquifers. Buildings can be cracked or titled; roads can be lowered or cracked, **streams, water impoundments, and aquifers can all be drained into the underground excavations.** Oil and gas wells can be severed, causing contents to migrate into underground mines into aquifers, and even into residential basements. Sewage lines, gas lines, and water lines can all be severed, as can telephone and electric cables. ... (emphasis added).

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While that subsidence law generally required 50% of the coal to remain for support in strategic places, it did many other things to protect the surface and limit the mining, explaining that the government was entitled to so act "to protect the public interest in health, the environment, and the fiscal integrity of the area," such as by "exercising its police powers to abate activity akin to a public nuisance," although the court made clear that the police power was broader than nuisances. (At 488) Of special note, the Court (at 493-94) noted that this challenge was to the enactment of the law before it was enforced, and that meant that it was premature to complain about how the law might be abused, when the facts of that surface and underground mining competition of rights were not yet established. Citing its own precedent in Hodel v. Virginia Surface Mining & Reclamation Ass'n Inc, 452 U.S, 264 (1981), the Court explained:

> "[The] court ignored this Court's oft-repeated admonition that the constitutionality of statutes ought not be decided except in an actual factual setting that makes such a decision necessary. [citations omitted] Adherence to this rule is particularly important in cases raising allegations of an unconstitutional taking of private property. *** (at 497): [W]here an owner possesses a full 'bundle' of property rights, the destruction of one 'strand' is not a taking because the aggregate must be viewed in its entirety. [The Court then followed that discussion how valid zoning laws always affect without any "taking" property uses with things like setbacks, lot size vs building size, etc.]

Please note that there is nothing in the disputed DEIR to explain why we surface residents above or around the mine need not worry about our legal right to mining contrary to our legal rights to "subjacent and lateral support and protection" from "subsidence" from either defective repair of the old 2585 mine that has been closed and flooded since 1956 and would now be blasted, tunneled, rock removed, and otherwise mined 24/7/365 for 80 years. How can we judge our risks when there are no clear standards and timely and effective monitors to protect us? History shows most often it takes a crisis damage event to trigger effective inspections, and at that point the damage is done, and all that would be left would be to pursue legal remedies against the miner, typically with an insufficient financial condition (see my #2) based and managed in a foreign place (eg, here Canada) whose only reported real asset is the mine everyone wants to close that just revealed such a problem. Remember the old Broadway musical that they made into a Clint Eastwood movie called "Paint Your Wagon" about Nevada City gold mining? It ends with the whole town collapsing into the miners' underground diggings. I hope that is not prophecy, but it illustrates one more topic in the disputed DEIR where there is no reliable or sufficient information. As to why that matters, besides our peace of mind and safety, consider question: what is your real estate broker going to tell a buyer about when you try to sell your house above or around the 2585 acre underground mine here? I do not think the answer will be, "don't worry, the DEIR reassures us all."

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Contrary to the disputed DEIR and other propaganda from the mine, even their own admissions cited in this Objection and others are sufficient to defeat the DEIR (see, eg, my #'s 2, 13, and 14). For example, consider that **this Objection and other challenge the disputed DEIR protective or safety assurances or mitigations, and, even apart from the merits, none are sufficient, credible, or feasible, when and if Rise cannot afford them, as shown by Rise's admissions (and its own accountant's "going concern qualification" to its audited financials)**

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in Rise's SEC Forms current 10K and 10Q filings. See, eg, my #2 and 13. That means us locals are even more likely to suffer even worse from the menace of a noncompliant and worse 2585-acre mine underground mine underneath them, blasting, mining, dewatering our groundwater, exposing us to hexavalent chromium toxic cement shoring, and otherwise burdening, risking, and harming us and our environment. What this Objection also demonstrates to those distant from the objectionable mine burdens, risks, and harms of concern to us locals, is why government decisionmakers should factor into their analysis continuing local resistance may expand if and as needed with appropriate self-defense legal and political counters and other competition if government were mistakenly to approve the disputed DEIR and the mine. See my # 3.N. We cannot afford to suffer the mine to continue imposing such burdens, risks, and harms to our real estate values, our homes, our water, air, safety, and environment, and even our community way of life. When distant decisionmakers consider that reality, then CEQA asks (and the DEIR has no sufficient answer, although its partial answer in its "Non-CEQA Related Analysis" at 4.3-103—104 is bad enough): what happens if the mine starts and then, as seems inevitable, stops well short of its 80-year run? That answer is that we would all be worse off than if the mine had never started, but less in misery than if the mining continued. Since the manufacturing/business site Alternative avoids all this conflict, I urge the decisionmakers to disregard the meritless dismissal of that normal business site DEIR Alternative at DEIR # 6 rejected by the mine advocates for no satisfactory reason. (The DEIR preferred fallback Alternative in #6 [the idea of just dropping the Centennial Industrial Site] won't work, because in reality it's not a separate project, but an integrated part of the one mine project, and cutting it out would mean a total rewrite of the whole DEIR to conform to that reality and comply with CEQA. More importantly, that DEIR preferred Alternative does not resolve any of my Objections, since most are focused on the 2585-acre underground mining, although I am not excusing the Centennial asbestos, pollution, noise, traffic, and other objections which are also sufficient to reject the DEIR. See my #14 and my supplemental brief.)

B. Some Other Ways To Illustrate And Calculate Examples Of The Many Risks, Burdens, And Detriments That Reduce Any Alleged Mine Benefits

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Please consult the many places in this Objection where I list and explain major concerns like using hexavalent chromium to shore up the mine, the burdens, risks, and harms depressing local real estate valuations as confirming proof of other mining impacts like subsidence and safety, water supply and quality problems and our local defensive water competition issues in the worsening climate change dryness and drought, air quality problems, excessive traffic, noise, and vibration problems, surface owner/user competition and legal and political conflicts with the underground mining, future vs past DEIR analysis errors, and scores of other locals' objections, unknowns not disclosed. Even limited to three minutes each at the hearing, it took all day on March 24, 2022, for more than 100 objectors to identify their scores of common and unique concerns. (I expect many will follow up with many more written objections, most of which seemed meritorious.) There are also many other burdens, problems, and risks the community could suffer, including those identified by other local objectors and some even admitted (but understated or incorrectly dismissed as trivial) by the disputed DEIR like constant big truck traffic (ie, 50 to 100 a day) harm to roads and other

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stresses on local infrastructure from the kind of 24/7/365 for 80 plus years of intense operations of a type government generally does not tolerate by even more beneficial local businesses.

Please also study the admitted financial reasons why even the deficient DEIR protections and mitigations do not appear credible or feasible, because the Rise SEC 10K and 10Q filings show a current inability of this miner to accomplish even what is insufficient things are assumed or planned in the disputed DEIR. See my # 2. In any event, whenever the mining stops for any reason, whether at 80 years, or if overwhelmed or underfunded, or just retreating when the mine is exhausted, or otherwise, as noted above, the disputed DEIR does not adequately address what happens when and if the mine stops without completing the assumed final remediation and cleanup. See DEIR's only and deficient such discussion at 4.3-103-04, which I analyze elsewhere. There are sad reasons why major such "bad ending" problems exist in the more than 40,000 California abandoned mines on the EPA website, and no "net benefit" can be calculated in favor of a mine as to which there is no credible assurance of funding everything promised or assumed "from start to finish" even in the deficient DEIR, much less what more would be required by the time the usual legal and political disputes are completed. State another way, it is less speculative for us to assume such a bad ending for such a disputed DEIR mine, than it is for the DEIR to speculate that somehow it can find the money needed to accomplish even what the DEIR planned, much less the other things that will be required if the mine continuous its continuously disputed process.

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The **"opportunity costs"** of such a profit exporting, exploitive mining business (such as what CEQA and the disputed DEIR call "cumulative impacts") include crowding out more desirable local businesses and residential opportunities to improve our community. That opportunity cost adds to the other risks, burdens, and harms on our exploited existing community, our existing resisting residents, and discouraging new additions and tourists. For example, because there will be progressively stricter regulatory standards limiting what community air pollution or water pollution or depletion, or other environmental stresses are tolerated here (see also my # 3.N), this "no net benefit" DEIR mine will prevent many new businesses or residents from coming to add even their small parts to our cumulative, community environmental tolerance limits. **Incidentally, those who are more focused on the small number of mining jobs than on the vastly greater number of us locals harmed by the mine above and around that 2585-acre underground area or the larger groundwater impact zone or real estate value lost-stigma zone beyond that, should consider this reality about the disputed DEIR mine: More construction jobs will be lost by inability to develop those residential and commercial properties in such areas, because of the impairment of real estate values from the mine and the reasons why such stigmas exist on the merits.**

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As another community-mine conflict issue, consider what happens when government tells our people that they can no longer use their wood stoves or burn their leaves and fire defense cuttings, because the DEIR mine has exhausted the margin of that local bad air tolerance capacity? Stated another way, because there will be many increasingly strict limits on the aggregate or cumulative impositions on our local environment, there should be some way of allocating that limited environmental tolerance capacity favoring/prioritizing local residents and the new additions we need for new human additions, tourists, and better businesses (and

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subordinating such no net benefit mining as the first thing to be shut down.) See my # 3.N. Otherwise, this no net benefit mine could crowd out the rest of those more desirable uses for its own uses, and our whole community will suffer for it, until, as discussed in my # 3.N, the courts or our local law reform political efforts correct the situation with wiser such priorities and limit the mine's burdens, risks, and harms.

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These DEIR mine problems could become an even greater threat if this mine is allowed to set such a negative precedent for such negative uses in our community. If this DEIR were approved our area would become a magnet for every other undesirable, polluter/exploiter looking for some target opportunity. Then the argument of more mines and other undesirable businesses will become that this is no longer an idyllic community, but rather just another expendable industrial area to be exploited. Want a case study to prove that? Look at what happened down in the Bay Area to Richmond after Chevron and Benicia after Valero. Stated more harshly, once one such exploitive and environmentally harmful and risky business is allowed, others will come knocking and arguing, not that they are desirable, but rather that the area has changed for the worse, and, since they are not as bad as this DEIR mine, they can jump our new "low bar" for approval.

C. Why Imagined Mine Benefits Are Less Than Alleged In the Disputed DEIR Or Illusory.

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While the DEIR mine might provide some small number of mining jobs for people from who knows where, if it finds the funds somewhere to actually reopen and operate (see my #2), the cost per additional worker is massive compared to what those jobs cost our community, as discussed above. Remember that those number of workers (and all the other locals imagined receiving alleged benefits from the mine) are trivial compared to the massive number of existing local residents and voters in this suburban (not rural as the DEIR claims) community, all whose real estate values have already suffered, not to mention the other coming burdens, risks, and harms described in this and other objections. In making that cost/benefit comparison one needs to recall that the disputed DEIR generally treats this "project" as if it's just the small Brunswick and (despite their meritless effort to separate it) the Centennial) sites, plus 30 well properties along East Bennett Road, instead of the reality, which is that PLUS the whole 2585-acre underground mine, above which thousands of us residents and voters live on the surface above and around that underground mining and in the broader groundwater impact zones or even broader still real estate stigma zones all around them, who will suffer daily and continuously resist for 24/7/365 for 80 plus years or until the mining stops again (as has since the mine closed in 1956.)

For the county officials making decisions from a safe distance and who might be tempted to address this as an abstract policy question or mistakenly give the disputed DEIR the undeserved benefit of some doubt, please consider this and other objections, especially what I said in my prior sections above and my analogy to what the California Supreme Court said in its ***Varjabedian v. Madera*** decision about the local sewer plant's disproportional harms to the locals downwind. Even if this mining project were for the public benefit (like a sewer plant), which it is not, and were not just for the private benefit of its foreign owners' profits (see my # 2), there are legal (as well as political) limits on what majority of the safe and distant imagined

beneficiaries of a local project can impose on the harmed local's unlucky to live nearby. As here, where the problems could affect us such locals 24/7/365 for 80 plus years, these continuous harms, burdens, and risks are not the kind of theoretical or ideological impositions that can be or will be forgiven or forgotten, since mining approval means those detriments described above, such as losing value in our homes, environmental quality, and the quiet enjoyment of our properties and community.

Conflicts, like those chronic and enduring legal and political disputes and competitions that would be unleashed by any disputed DEIR and mine approval, are not just divisive, but they are also distracting and expensive for our local and county governments and the rest of us (and bad for tourism and real estate values; who wants to be described as the "next Hinkley" to suffer from hexavalent chromium in our water?) This is not the time for that kind of endless battling to be triggered by approving a DEIR mine with no net benefits and all these demonstrated, and even some admitted, adverse consequences and insufficient or illusory mitigations. Because until the mine threat stops us local victims of the mine must be expected continuously and indefinitely to exercise our competing legal and political rights to resist the DEIR mine risks and harms and to protect our property, environment, and community way of life above and around the 2585-acre mine (and in the groundwater depletion impact and other stigma areas around that, where real estate values will also be depressed), approval of the DEIR mine by government starts intense legal and political conflicts and competitions at a time when our community and country need no more conflicts and division. See my # 3.N.

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One of many problems any approving government will have is that once our real estate values are depressed, our environment and quality of life is harmed and at risk of worse, and our groundwater and NID water is being wasted on this mine during the perpetual climate change dryness and drought, how do our governments manage such intractable continuing conflicts thereafter? Getting caught in such legal and political crossfires and competitions is going to be bad for government, as well as the rest of us. No one should want our government budgets diverted to the legal costs associated with the endless legal and political conflicts and competitions this DEIR would trigger and continue. Once approved the DEIR mine has been given rights by our government, the miner can be expected to defend them, although not as vigorously as us locals defend our homes, environment, and community (see my # 3.N). Such competitions and conflicts will force governments to take sides, which then becomes the single dominate issue in every election until the mining stops. Consider us locals did not come (or stay) here for the mining, nor has anyone else for generations. We can for the quality of life, environment, and community that we love, and now this foreign miner, who will never be part of our community, wants to deprive us locals of what we already have.

At the local level that means more than just massive, "single-issue voting" by thousands of us anti-mine locals, since, for example, I cannot imagine ever voting again for or supporting any mine supporting politician of any party. But, as discussed in section 3.N above, local mine opponents will have a legislative agenda for law reform for regulating the mining and related threats, risks, and problems until the mining stops. Remember, for those of us at risk of these harms, approval of the mine would mean stripping away important things away from us that we now enjoy. That is especially intolerable when there is no corresponding "net benefit" to anyone locally or even in the County to justify us even considering making such any such sacrifice. If this DEIR mining happens, there will be endless "I told you so" situations to haunt



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any pro-mine politicians, some of whom many of us could otherwise favor for other issues, but not as long as the mining exists.

Once the mine has started and while the courts and other forums are deciding what to do about that in the context of various different kinds of legal and political disputes and competitions beyond CEQA that are predictable from time to time, there will be an intense focus will become on monitoring and enforcing compliance with applicable laws and regulations. All of us local objectors will be exercising our public records and other monitoring rights and systematically collecting data and evidence on noncompliance events or conditions and other "I told you so" situations. That is where the interim conflicts with government officials become most likely. It would be unusual (at best) if this mine's operations went as smoothly as imagined in this disputed DEIR. In my experience none of the more 40,000 California abandoned mines on the EPA list probably adequately warned the applicable governments or public in advance of the risks and problems that stopped the mines typically after causing much local misery, often on the despicable theory of predators that it's better to ask forgiveness than permission. Therefore, when there are compliance problems, the key question becomes: does government enforcement accommodate such situations as they would for a beneficial local business, or does government enforcement use its power to progressively enforce such laws and regulations to minimize the burdens, harms, and risks to us locals for DEIR mining that should never have been approved in the first place? That is the choice every politician and every voter must make for the next 80 plus years, while us locals are suffering under 24/7/365 burdens, risks, and harms addressed in this and other objections. If that is too

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expensive and counterproductive for our local government, then don't approve the DEIR or the mine. In any case, we'll want officials who are interested in money saving collaborations with us locals consistent with our stated concerns to rigorously enforce all applicable laws and permit conditions without any waivers, plea bargains, or other excuses.

If this sounds too abstract, consider one example. One legal and political battle will be over access to information about the mine's compliance and operations. Us citizens who are at risk of harm will be seeking various ways to monitor the mine and to collect, assess, and defensively use information and evidence, especially when such data contradicts the DEIR or proves the truth of what objectors like me are expressing. What us local voters will want is the election and appointment of officials who will aggressively monitor and enforce compliance and investigate citizen complaints and problems. (Note, as explained elsewhere, putting up monitors along East Bennett Road or the surface borders of the Brunswick or Centennial sites is almost meaningless to the real burdens, risks, and harms that concern those of us living above or around the 2585-acre underground mine, which is where the real monitoring is needed, although, if I were NID, I would be testing all the purportedly treated mine water released downriver into the Wolf Creek for fear not only of human errors, or storms or other conditions that defeat adequate treatment, but because of what toxins may still be in that water which many will no longer want to use, even if, at present, some industry sympathetic regulator imagines that the toxic level is tolerable. (Standards often change too late, based on harms done to prove the errors in existing lax standards, as one may note by study of the hexavalent chromium threat the disputed DEIR wants to inject into this mine cement paste shoring for the 2585-acre underground mine after the Erin Brockovich reality horror movie inspired the

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thousands of studies now posted on the EPA website or available in a simple Google search or explained in the European Union ban coming in 2024.)

5. **Even the Disputed DEIR's Own "Hydrology And Water Quality" Admissions (eg, #4.8, and other scattered DEIR data analyzed by my #'s 3.D, E, F, and M, and D, G, and H, as to the CR+6 Threats) Illustrate the DEIR's Comprehensive Errors, Omissions, And Deficiencies Regarding Supply, Depletion, "Drawdown," "Recharge," And Other Water Problems Much More Wide-Spread And Serious Than the 30 East Bennett Road Dry Wells: Some Inconvenient Truths The DEIR Ignores About the Dangerous Future "New Normal" Of Drought And Climate Change Worsened By Underground Blasting, Tunneling, Rock Removal, And Other Mining, And Also By NID Water Waste For 24/7/365 For 80-Years, Etc.**

   A. **An Introductory Overview Illustrating Some of the Many Water Related Objections To the DEIR That Evade the Real Burdens, Risks, And Harms In Our "New Normal" By Pretending the Past Is A Reliable Guide To the Future (See my # 3.M).**

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If this dispute DEIR and mine approval process advances to the next dispute stages, experts will battle over many, complex technical surface and ground water issues. Such disputes often will not involve "apples to apples debates," because the disputed DEIR attempts to limit the debate to its almost exclusive analysis of the past and an artificially small part of the CEQA "project" that largely ignores us living on the surface above and around the 2585-acre underground mine, while us potential victim neighbors and locals and our community are focused on the "new normal" we face in the future and our competition with the mine for groundwater and NID water as supplies diminish. (I said almost because the disputed DEIR misuses some NID surface water/weather data until 2040, as discussed in my # 3.M, but asserting beyond that the either nothing changes thereafter or CEQA excuses the DEIR from speculating on what would happen as the mine continues to deplete our groundwater thereafter for the rest of the 80-years; in effect, transferring the risk of what they call the unknown to us local residents who have our own rights to that depleted groundwater.) As explained in many places in this Objection, the largely irrelevant, unreliable, and even misleading past on which the disputed DEIR relies (eg, average rainfall between 1967 and 2017 that cannot predict our groundwater recharge rate or "balancing") is no longer a reliable guide to a future that science and our experiences assure us will be different and much worse as we confront and react to chronic and massive drought, wildfires, climate change, and other calamities almost entirely ignored by the DEIR. Hint: any government decisionmakers should have someone highlight all the places where the disputed DEIR conditions critical predictions, assumptions, and conclusions (which we objectors refute) with words like "under existing conditions." The reality is that the future is certain to change in ways that make such qualifications and the entire DEIR useless or worse in assessing the coming burdens, risks, and harms to thousands of us locals and our community impacted by the 2585-acre underground

mine. Among the many reasons for that are also such changes that will occur from the new, expanded, and deeper 24/7/365 mining itself into unknown (or unrevealed) underground conditions, as well as from drought, climate change, and other future problems almost entirely ignored by the disputed DEIR and its advocates.

As noted in more detail in the next subsection below, the errors, omissions, and deficiencies of the disputed DEIR regarding NID and groundwater are compounded by the fact that they are scattered throughout many sections of the DEIR, frequently providing inconsistent or contrary data, and obscuring inconvenient truths that the DEIR should, but refuses to, address in a comprehensive and integrated discussion of the many disputes and issues. See my # 14 and my supplemental CEQA rebuttal brief. If this section (or my illustrative statement of DEIR facts and contentions for rebuttal in my objections above) seem to contain repetitive data from some other parts of this Objection, I apologize, but I blame the disputed DEIR's scattered approach to which I was compelled to respond in two ways: once in the various places where the DEIR chose to bury important water data in places outside the labeled water discussion in DEIR # 4.8 (where people expect it all to be revealed), and, secondly, here where I can provide some clarity by a more comprehensive or detailed discussion of water issues (or at least some helpful cross-references lacking in the DEIR) that the DEIR chooses to separate and obscure.

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What this Objection attempts to do is to remind the applicable governments that, if one were to mistakenly believe the disputed DEIR or its advocates (which many of us affected locals do not believe for reasons explained in our objections), the DEIR incorrectly claims this water supply depletion and waste issue is merely about drying up 30 or so wells along East Bennett Road. Wrong and worse. First, by ignoring the chronic droughts and adverse climate change effects, the disputed DEIR ignores the predictable responses when the rest of us start competing with the mine both (i) for NID water in shortages, and (ii) for our groundwater under our owned surface properties, including those of us owning and using the surface above and around the 2585-acres being mined underneath us. While the mine disposes of precious water as dewatering mine waste to be treated and discarded somewhere else downriver in the Wolf Creek, the rest of us need that water for our own use, as well as our forests, plants, and environment that are already drying out and increasing our fire and fire smoke risks. When NID is no longer able to supply our local needs, locals here will certainly do what everyone else in the State is doing in areas where there is suddenly insufficient water from their water company: they drill competing wells to survive on the groundwater they already own. What is a small number of dry wells today will become a huge number of competing wells for thousands of us in the future, especially if the State or other governments do what happened last time when we had two-hundred-year droughts in a row: limit water deliveries to locals (eg, 50 gallons a person) so that our water can be shipped to even more desperate places, even when they don't deserve it (eg, think desert golf courses and grass yards, subsidized cotton farms, and profitable almond farms), because they caused much of their own shortages by tolerating waste like this mine. (Note: I lived in Orinda at that time when our East Bay MUD water was limited to 50 gallons a person a day, because much of our water was piped to Marin County instead, which had sabotaged by neglect their own water supply to obstruct real estate development, and people began to drill self-defense wells.) While this will be a challenge for any government, this disputed DEIR mine dewatering and "wastewater" disposal somewhere else down Wolf Creek will make our community conflict problems much worse (see my # 3.N), especially when one

considers the hexavalent chromium threat and other water quality concerns (see my # 3.C, G, and H and 7).

Second, the "existing conditions" and past data (irrelevant or misleading rain average between 1967 and 2017) on which the disputed DEIR relies are certain to change because of the new, expanded, and deeper mining itself. Who knows what lurks in the 2585-acre mine depths unaddressed in the DEIR or assumed without satisfactory analysis of the impacts and risks for us locals? You don't need to be an expert to fear that the proposed 24/7/365 blasting, tunneling, digging, rock removal, processing, and the rest itself will change the "existing conditions" qualifications so common in this DEIR, especially when the whole mine is to be shored up with hexavalent chromium cement. Even more absurdly, this disputed DEIR also begins this mining of that 2585-acre underground mine with no idea of its "existing conditions" since it closed and flooded in 1956. The governments will need to share information from both the insufficient DEIR monitoring and the additional monitoring imposed by locals legal or political defense activities, because it's too late and limited protection for local victims when the future realities become apparent by discovery that our fears were correct when some predictable disaster strikes. That is when government and the courts will have to struggle at a more intense level over the competing rights of us surface locals and our community versus the mine which has no net benefit to us locals or our community that outweighs its burdens, risks, and harms.

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This section demonstrates some basic related flaws in the disputed DEIR with illustrations that expose some of the DEIR's more obvious strategic errors, omissions, and deficiencies. My purpose is to provide some background examples proving the merit of the hard water questions that the applicable governments must ask (See my #'s 3.D, E, F, and M, 14, and 15.), as well as to illustrate how the disputed DEIR continuously misdirects and evades the critical realities without addressing even the obvious questions of concern to the neighbors and local community. This goes far beyond 30 dry wells along East Bennett Road and focuses on the areas above and around the 2585-acre underground mine, such as those addressed in my such cited Objection sections to include our concerns about lowering the water table and harming the forests and environment here that are already suffering from drought, insects, and other climate change problems. Such abuse of our surface by water depletion, drainage away to distant places down Wolf Creek, and waste will worsen the other environmental conditions the disputed DEIR understates, ignores, or deficiently addresses. For example, by drying out the surface by lowering the water table with such water depletion and waste, the DEIR is increasing our fire and fire smoke risks, which in turn makes our air quality and health more at risk. We live in an interactive "environmental system" where harm to one central part like water sufficiency and quality threatens significant adverse effects on the other parts like air quality (eg, fire smoke) or water quality (see my # 3.C, D, E, F, G, H, J, and M, 6, 7, and 10.)

Consider the entire underground area of the 2585-acre mine that is largely neglected by the DEIR (but not by the affected community), where the DEIR's **admitted facts inefficiently** describe 2585-acres of planned underground blasting, drilling, tunneling, rock removal, Cr+6 cement shoring, and other activities 24/7/365 for 80 years (see, eg, my #'s 3. A, B, C, D, E, F G, H, and M, and 6, 7, 8, 9, and 12.) with 72.8 miles of underground tunnels (7.5—8.5 feet wide) so far, without any satisfactory limitations on how such threats could expand and worsen by the new, deeper, and expanded mining into unknown parts of that area. By analogy, imagine a

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bucket with holes (ie, the water drains and pump system) once full of water needed to remain full of our jointly owned groundwater level needed both to sustain surface wells and our home forest and other life and essential environmental conditions on the surface and to even avoid subsidence and maintain the legally required "subjacent support" and "lateral support" (see my # 4 and 14) of those of us living on the surface above the 3585-acre underground mine, all of which is generally ignored and evaded in the disputed DEIR. (When I say forests, I am not referring to what the DEIR incorrectly describes as a rural situation, but rather the fact that, for example, thousands of affected residents of Banner Mountain like me live in homes surrounded by big trees. For example, as is typical for the whole area, in the fenced acre around my suburban house I have 48 trees over 50 feet tall [many heirloom ancients], with more in my other two acres.) See also my discussions of the subsidence and other impacts on surface and near surface infrastructure and improvements, when the subjacent or lateral support is impaired by such drainage, including such legal issues ignored by the disputed DEIR, because, among other things, DEIR ignores the massive problem by attempting to limit the debate to such 30 dry wells along East Bennett Road. What the disputed DEIR proposes to do is to drain water from that local area "bucket" continuously 24/7/365 for 80 years on the unproven and disputed idea that somehow sufficient "recharge" water (eg, imagined average rainfall from 1967 to 2017) will replace all that drained **and wasted** water as fast as it is transferred elsewhere downriver by the Wolf Creek, maintaining the illusion of theoretical "balance" that the disputed DEIR incorrectly attempts to assume (not promise or prove) in DEIR # 4.8 and other places where the DEIR has scattered that data.

Notice that the disputed DEIR attempts to justify this massive depletion, drainage, transfer, and waste by looking back into the DEIR's disputed version of the irrelevant **past** and its selected and disputed historical studies, while ignoring the unprecedented, "new normal" reality of coming **future** drought and climate change problems. The reason that the "bucket" metaphor is apt is that groundwater is does not readily or timely rebalance itself (like the ocean does) when there is such drainage, because, as even the DEIR admits, there are unknown underground conditions that generally limit the local area groundwater replenishing itself from distant sources when the local water (the bucket) seeps into the mine to be drained, pumped away, and wasted in the Wolf Creek. That is why the disputed DEIR mentions (but does not helpfully apply) concepts, such as "transmissivity" and "hydraulic conductivity," which complicate and obstruct "balancing" of the underground water levels by drawing from more distant places. The point for now is that the future here (as has already been proven in the Central Valley, Bakersfield, and elsewhere) is not "recharge" or "balance," but chronic depletion 24/7/365 for 80 plus years that creates many environmental problems on our surface above and around the 2585-acre underground mine, as well as "subsidence" threats to surface infrastructure and improvements deprived of subjacent support.

What the disputed DEIR proposes will create local burdens, problems, and risks that are not considered or satisfactorily addressed in the DEIR, such as what lessons can be learned (and must be applied in any final EIR) from other places in California where groundwater depletion not only worsens the impacts of chronic drought and climate change, but by reducing subjacent and lateral support causes subsidence that drops the surface level by many feet, harming or threatening surface (or near surface) homes, infrastructure, and improvements. While the soil and aquifer conditions are different from here in such Bakersfield and Central Valley areas, the

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scientific principles are the same. See admissions at DEIR #4.8-16, where it notes that "hydraulic conductivity" related to the "permeability of the overall aquifer zone" is usually addressed for "porous media, such as sand and gravel type aquifers": "but they are also applied to fractured bedrock aquifers when there is a sufficient degree of fracturing and interconnections between fractures." That means water depletion and subsidence can also occur throughout this fractured rock aquifer area, and, since the DEIR has no adequate study of the actual underground condition that now exist or that its new, expanded, and deeper mining will create, there is nothing in the DEIR to ease our concerns. Think of it this way, if again you put a hole in the bottom side of the bucket (aquifer), that will empty the whole bucket, not just the original 2585-acre mined area water. Everyone depending on that fractured rock aquifer water suffers as the whole area water level drops (absent illusory recharge assumptions from average rain between 1967 and 2017). Considering the depth at which this mining (ie, the

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24/7/365 blasting, digging, tunneling, rock removal, pumping, and dewatering process) occurs, the burdens, risks, and harms could be massive over such 80 years, far beyond both the mine owned surface boundaries (which are the only things that the disputed DEIR even purports to address besides the 30 East Bennett Road wells) and above and around the 2585-acre underground mine and even beyond that, since it is unknown what new groundwater problems the old mine repair or the new, expanded, and deeper mining will create.

No one should take seriously as a CEQA compliant "good faith" attempt to analyze these issues a disputed DEIR, whose essential erroneous premise is that the future risks and problems for the next 80 years can be judged from past history like average rain between 1967-2017, since any rational and reasonably well informed person can see that we now face unprecedented underground and NID water risks and problems that make such backward looking analysis irrelevant, materially misleading, and dangerous. For example, if one Googles even casually about groundwater depletion from pumping or about related "subsidence" (or more technically removal of "subjacent support") one will find many government and scientific reports and studies about these calamities, such as addressed in California's Sustainable Groundwater Management Act, largely ignored by the disputed DEIR (a complex debate I leave to the other objectors more expert on the science), which may eventually "grow teeth" and greater relevance against such water abuses here long before the 80 years expire. While these problems are currently most obvious where they are devastating the Central Valley, Bakersfield, etc, the disputed DEIR is bringing those problems right here to Grass Valley, and that horror reality show is the history that is more relevant than the climate change ignoring DEIR's focus on the "good old days" of environmental abuses by the mining industry.

If the disputed DEIR imagines some reason why this mine area will be different, the burden of proof and persuasion should be on the DEIR to prove that to us locals with clear and convincing evidence. So far, all we have is evasion or ignoring of these key issues without

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anything convincing at all. For example, because the disputed DEIR seeks to export our groundwater away from us and our aquifer for 80 plus years to places downstream in the Wolf Creek, where does the water come from that the DEIR imagines to replace/recharge what they have taken away from us and (from the perspective of those of us concerned about water as an essential local public resource, and because we surface property owners own that groundwater below our homes) wasted? (ie, where does the replacement/recharge water come from for this imagined "balancing" of our own underground water pumped out of our local area and aquifer

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to some other place where it does us no good here?) As should be irrefutable and as illustrated by the diminished state of the aquifers in other with excessive pumping in the Central Valley, Bakersfield, and elsewhere, there is no balancing; just increasing depletion and subsidence at an increasing deficit as climate change and drought dry out our land. While such other competitive pumping at least is for local human benefits and growing crops etc, as demonstrated in the case of this mine (my # 4), there is no such net benefit here for such DEIR depletion and waste of our precious water for mine profits to export to its foreign investors. Government planners should ask how many important and locally beneficial projects will be rejected in the future 80 years, because of insufficient water on account of this disputed DEIR waste to dewater their mine. See, eg, my #'s 4, 8, and 14.

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The point for now is that there is a large local area (where I live) at huge risk above and around this massive 2585-acre underground mine, and my whole fractured rock aquifer (ie, the whole "bucket") even before the new mining expands and deepens further (see my # 3.A, D, F, and M, discussing DEIR admissions, errors, deficiencies, and omissions), and none of the key concerns of those of us potential victims are satisfactorily addressed in the disputed DEIR or elsewhere (eg, in the Rise mining data in its 10K discussed in my #2.) Worse, since the DEIR has not alerted us neighbors in the impact, risk, and stigma zones of those direct threats to our 200 deep feet surface rights that include groundwater at all depths (eg, nothing in the DEIR adequately identifies where the surface addresses are above the 2585-acre underground mine, which the disputed DEIR incorrectly ignores generally as if it were not part of this "project"). See, eg, my # 4 and 3.N, discussing how surface owners and users above and around the underground mine will suffer from loss of real estate value and marketability, as well as environmental burdens, risks, and problems. Why is that basic surface versus 2585-acre underground mine information not shared in this DEIR process? Is it because the disputed DEIR hopes to obtain its approvals and permits before the mine's local surface neighbors fully appreciate such threats to their individual homes and environment, not just generally to their community?

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The applicable governments should also consider the problem of "subsidence" from the blasting and removal of the underground rock depriving us surface owners and users (eg, utilities, roads, public improvements, etc.) of the essential subjacent support they depend upon and have legal rights to expect and protect. See my above legal discussion and my # 4 and 5, 6, 8, 12, and 14. Such problems will not only harm our community, but also our local taxes that should be spent on better things will be applied to fixing problems created by the disputed DEIR for the benefit of exporting profits to generally foreign investors. See my # 3.N, 2, and 4. While water does not provide the same subjacent support as the rock did, it is clearly better than nothing, which is what seems to be happening here when both the rock and the water are removed from supporting the surface. See my # 3.A. The reason that it is so important to stop this mine before it starts operating is that most of us victims' more effective legal remedies are delayed until we suffer damages and are then triggered by the impact of such harms on us. When such concerning harms and risks occur, all that is left will for us victims will be the typically disappointing litigation recoveries for harms done and court and/or governmental orders to stop mining and causing further harms. Unfortunately, as I have demonstrated from bankruptcy and cross-border insolvency cases (see my #1), the usual result illustrated in a long set of precedents in unrelated prior industry scandals is that the local miner exports its profits

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to the foreign investor beneficiaries and then, when the mine is now longer profitable, it is commonly abandoned or dumped into a bankruptcy (and sometimes cross-border bankruptcy), resulting almost always in disappointing recoveries for the local victims. There are sad reasons why there are more than 40,000 abandoned mines in this State on the EPA list that no one is cleaning up and that continue to be a blight on their local communities. If this disputed DEIR is to be an exception to this horrible tradition, why is the DEIR not making that case that it is the exceptional "good actor" in a scandal prone industry, as opposed to the DEIR dodging the key issues as if it were hoping the locals at risk would not notice until it was too late or hoping our elected representatives would not care enough to protect us locals from such disputed DEIRs and mining burdens, risks, and harms to which our community is now alerting those officials?

B. Admitted DEIR Water Data Conceals Massive Unaddressed Issues, Errors, And Omissions, And the DEIR Fails To Reveal The Underlying Assumptions And Artificial Limitations On Which the DEIR Bases Many Flawed Conclusions, Contentions, And Assumptions We Locals Dispute.

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Among the most serious DEIR deficiencies is the failure not only to identify and address the real groundwater and NID water issues, but to spread out the often-conflicting scattered water and related data in unclear, confusing, and hard to reconcile ways in many different sections of the DEIR without links or cross-references, and often without common usage of terms or data to make understanding easy. See my # 14 and my supplemental CEQA brief citing cases forbidding that kind of DEIR game. Any serious reader comes away from reading one DEIR water discussion by saying not only "yes, but what about" certain errors and omission, but also "how does that match what you said in that other section" somewhere in the 1500 plus page DIER maze? Compare the location of various water related admissions that I quote and dispute in this Objection, and government decisionmakers will begin to understand that, whether it is intentional or not, the mine advocates could not have made any understanding of the disputed DEIR water issues any more difficult if they tried to do so as a tactic. Just consider this one critical example, by studying pages 4.11-35 to 52 in the DEIR's "Public Services And Utilities" # 4.11 (where, in discussing NID water supply issues they approach some realities more realistically than elsewhere, although deficiently, the DEIR is more revealing than in the frustrating and intensely disputed 83 page discussion in "Hydrology And Water Quality" # 4.8 (where there is no sufficient attempt to reconcile that mine data with that NID discussion or even other conflicting and disputed water discussions scattered in many other DEIR sections.) Among the interesting credibility challenges in this process is the following [slightly annotated to expose the disputed DEIR bait and switch game] quote at 4.11-39 to 43 from a subsection of that "Public Services And Utilities" section called "Projected Water Supplies" wherein the DEIR admits some limits (who knows what exactly, because most of the underlying disputed DEIR assumptions underlying its disputed projections are apparently buried in the lengthy reference materials the DEIR selected to support its disputed DEIR conclusions or assumptions):

> Projected Water Supplies. Table 4.11-5 provides a summary of the District's projected supply entitlements [through 2040]. [The relevance for this Objection in the following quotes lies in the unaddressed conflicts between NID's analysis of surface water

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supplies, since NID does not use groundwater, as discussed elsewhere, and the DEIR's intensely disputed and, frankly, absurd, groundwater "recharge" assumptions which ignore climate change and credible science in order elsewhere in the DEIR incorrectly to predict the future from the average rainfall between 1967 and 2017 instead of the "new normal" used by responsible scientists, governments, and businesses to predict a chronically drier and drought harmed future.]

Water Code section 10910(c)(4) requires that a WSA [Water Supply Assessment, on which the DEIR mistakenly relies in cites throughout its disputed texts regarding water, and, therefore, which misapplies the NID's different standards than CEQA and other relevant laws to this mine's imagined and disputed ability to recharge the ground water it depletes and sends somewhere else downriver in Wolf Creek.] include a discussion with regard to "whether total projected water supplies, determined to be available by the city or county for the project, in addition to existing and planned water demand associated with the proposed project...." Accordingly, the WSA addresses these three hydrological conditions through the year 2040 ... in Table 4.11-6. [The disputed DEIR then purports to "summarize" "projected availability" from the District's existing and planned future supplies THAT DO NOT INCLUDE GROUNDWATER OR ACCURATELY ADDRESS THE MINE'S LOCAL GROUNDWATER DEPLETION AND RECHARGE, but instead focus on] ... the District's projected water demands in normal, single dry and multiple dry years throughout buildout. [As elsewhere this DEIR compares "apples to oranges," since it is focused on the NID general service area demands from NID's surface water sources as distinct from rain recharging the massive groundwater depletion in one local area in and around the 2585-acre underground mine from 24/7/365 dewatering for 80 years, not the 20 years/2040 limit NID uses for different purposes under a different law than CEQA applying to water districts.] As shown, demand within NID's service area is expected to exceed the District's supplies from 2025 to 2040 during Single Dry Years and in the first and second years of a Multiple Dry Year period from 2025 to 2040. [This is confusing since this DEIR paragraph at 4.11-39 begins with a "20-year projection" and shifts to the 15-year period "from 2025 to 2040." Throughout this Objection I make reference to the lethal DEIR flaw of it limiting its perspective to this 2040 or 20-year cut off, as if somehow it is entitled either to ignore the last 60 or 65 years of its 80-year mining binge and/or, perhaps, to assume that the DEIR can assume the whole 80 year period matches the first disputed 15 or 20 year flawed and misleading projections ending in 2040. For convenience and simplicity, I often just say "20 years" to avoid addressing this complexity and confusion every time it occurs. Since 20 years is better for the DEIR's disputed theory than 15 years, the DEIR advocates should not complain (but somehow, I expect they may anyway.]

Factors contributing to inconsistency in NID's water supplies include legal limitations due to water rights and contracts limiting the quantity of water available to the District, environmental constraints, and reductions in availability due to climatic factors. The surface water supply to NID is subject to reductions during single and multiple dry years (seasonal and climatic shortages). ... [These same kinds of limitations apply with equal

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and often greater force to the existing and future competition for groundwater around the 2585-acre underground mine by locals like me, as demonstrated elsewhere in this and other Objections, but the DEIR inconsistently ignores any discussion of groundwater rights disputes and limits, except for a distracting and disputed discussion of the 30 or so wells along East Bennett Road. Since the DEIR recognizes these factors here (with even a rare mention of the bare word "climate"), why not address the matters where it matters most, as the DEIR or mine approval would trigger competition and legal and political disputes with us locals over groundwater as to which we have at least equal, if not superior, rights.]

***

Water Supply Sufficiency. Pursuant to Water Code section 10910(c)(4) and based on the technical analyses describe in the WSA prepared for the proposed project, the total projected water supplies determined to be available for the proposed project during Normal water years during a 15-year projection would meet the projected water demand associated with the proposed project. (emphasis added) [Again, this incorrect general conclusion appears to be a bait and switch as above, since that WSA etc analysis is focused on NID general supplies from surface water; and not on recharge to our local groundwater from mine depletion from dewatering 24/7/365 for 80 years during a time when the old "normal" of the disputed DEIR no longer exists because of climate change, unprecedented dryness and drought, and greater competition from locals accessing their own groundwater rights from above and around the 2585-acre underground mine. While we also dispute the sufficiency of NID supplies to the mine for no net benefit to the community, as described elsewhere here, the above discussion and others in this Objection demonstrate the errors, omissions, and deficiencies in this DEIR.] ... Therefore, [with the DEIR incorrectly referring to NID's "projected 2040 water demands" as to the 30 East Bennett Drive property connections, as if that were the only project impact, a claim contrary to many parts of the DEIR my Objection addresses] NID would be able to serve the proposed project in addition to existing and planned developments with some reliance on demand reductions in dry years by 2025. [This erroneous conclusion is contrary to the DEIR itself, although it seems to admit that even the portion of the water use admitted here is admitted requiring "some reliance of demand reductions in dry years by 2025," which means that applying better information with a fair and appropriate analysis would create even bigger shortages.]

[Besides what DEIR calls a Normal Year, Table 4.11-5 actually admits at 4.11-40:] "Potential Surplus (Deficit)" [for] "Single Dry Years" [of progressively increasing deficits from 2025 to 2040 in acre feet/year] [for] "Single Dry Years" [ranging from] [negative] 85,629"/"48%" "Percent Shortfall of Demand" to "-98,814"/"52%" "Percent Shortfall of Demand", [as well as more deficient years for Multiple Dry Years]. ... [continuing at 4.11-42] Water demand within NID's service area is expected to exceed the District's supplies by more than 45 percent from 2025 to 2040 in Single Dry Years and by less than 10 percent from 2025 to 2040 during the first and second years of a Multiple Dry Year

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period. [That ignores many realities of expected increased water use, because, instead of 30 wells, the reality will be hundreds of competing wells just in the areas above and around the 2585-acre mine, as locals combat climate change and drought as well as the mine's groundwater depletion, as I explain elsewhere. If the DEIR advocates or NID imagine that they can stop that competition, which has occurred already all over the state and is continuing where water supplies are already tight, then they do not appreciate the political and legal ferocity of such locals defending their homes, their forests and environment, and their community way of life from the no net benefit mine's massive depletion and disposal downstream and other waste of our shared groundwater. See my #'s 3.N and 4. The indisputable reality is that few, if any, of us thousands of affected locals will be willing to sacrifice anything for the benefit of this undesirable mine.] However, this project is not expected to exacerbate NID's water supply shortages during dry years and the project will supply water into the South Fork Wolf Creek and into the NID conveyance system, at volumes exceeding the project water demand for potable water from NID. [Even if that were true, it means little to those of us living above and around the 2585-acre mine, who are losing our groundwater to the mine dewatering waste. Moreover, on the merits, why would NID allow its system to be polluted by mine water that, even if correctly treated (which would delegate trust to this miner for 24/7/365 quality for 80 years, which seems unlikely when it comes to the downstream user's families' health), no one wants even to accept even the level of hexavalent chromium and other mine water toxins that some industry influenced bureaucrat standards official may still consider tolerable, despite the EU ban, a mountain of negative evidence on the EPA website, and the *Erin Brockovich* stigma.]

*** This project would be subject to any applicable water demand cutbacks during droughts, like other NID potable water customers who are served by NID. [However, the mine can then be expected to increase NID customer demand in years when their wells have deficient supplies, and none of that predictable defensive conduct is addressed in the DEIR or by NID, perhaps in the case of NID because the managers do not expect the coming policy changes coming from the local voters to assure that they do not suffer from water wasters like this mine. See my # 3.N. The future will become what some politely call "competitive," but what more accurately is about thousands of local voting residents insisting on their legal and political rights to their priority share of surface and ground water over less beneficial uses, especially no net benefit uses like the mine.] *** (at 4.11-43) Thus, a less-than-significant impact would occur. [That incorrect and disputed conclusion does not follow from the preceding analysis that is rebutted above and elsewhere in this Objection and others. Please note, however, that the rest of the disputed DEIR states that the economics of the mine (like the miner itself admits in its SEC Form 10K and 10Q) are so fragile that anything less than continuous 24/7/365 operations for 80 years creates significant operational and environmental problems. DEIR at 6-14. Such admitted water problems are inconsistent with those disputed DEIR claims, as addressed in my rebuttal to the DEIR's "Alternative's Analysis" discussion I address near the end of this Objection at my # 13.]

Part of the reason for the errors, omissions, deficiencies, and worse addressed in the prior paragraphs relate to compounded mistakes and worse in the DEIR's preceding discussion (DEIR 4.11-7 at 4.11-35 to 38) entitled, "Project Water Demand," which distinguishes (unlike most of the DEIR) between "Potable Water Demand" and "Non-Potable Water Demand," which roughly correlates to surface water from NID versus groundwater from the underground mine. Those disputed DEIR discussions are summarized at Table 4.11-3 (at 4.11-38) stating "Total Groundwater Consumption for Non-Potable Water Use" of "84,000 gallons per day"/94.1 acre-feet per year" and "Total Water Use" of "107,600 gallons per day"/"120.5 acre-feet per year." However, scattered in discussions on 4.11-35 and 36 are various NID water uses at the mine, such as: (i) "5700 gallons per day" for Brunswick Industrial site building uses, (ii) "17,900 gpd" for replacing groundwater from 30 wells on East Bennett Road, and (iii) "42,000 gpd" for dust suppression and compaction for five years at the Centennial Industrial Site (which is not really a separate CEQA project as the disputed DEIR claims). Instead of a total, the DEIR scattered that data by use, apparently hoping that critics cannot add [5700, plus 17,900, plus 42,000 equals 65,600 gallons per day], the disputed DEIR states aggregated service area numbers on that same page in Table 4.11-4, entitled, "Projected NID Service Total Water Demands with Project (ac-ft/yr)" of "Total Water Demand" progressing increasingly from 161,678 in 2020, to between 174,763 to 217,951 in 2040. [By comparison, and as a reality check on the resolute political and meritorious legal defense activities that this no net benefit mine related water competition and waste will inspire from us locals competing for our share of NID and ground water above and around the 2585-acre mine, the most strict and painful governmental drought water restriction I have suffered since I moved to California was 50 gallons a person a day, and that happened in part because some of my local East Bay MUD water was reallocated to much drier Marin County. As political policy people, consider now how you decisionmakers would propose to deal with such a 50 gallon a day limit on human use, while this no benefit mine still uses some large part of its admitted 84,000 gallons per day use of our shared groundwater, claiming an excuse that it cannot dewater the mine adequately to stop flooding, unless it takes more than its share of water away from competing and higher human priority uses. The same question applies as to the mines attempt to excuse excessive use of NID water. Because us voters and local property owners with competing rights will not tolerate that (see my #'s 3.N and 4), that leaves you decisionmakers confronting the questions that the DEIR seemed afraid to address in a comprehensive and sufficient manner: what happens when the mine is no longer has or is allowed to use the water it says that it needs for such mining operations? See DEIR # 4.3-103-104 and my rebuttals to that inadequate DEIR response.]

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C. Nondisclosures, Errors, And Disputes Regarding Future Risks And Problems From New, Expanded, And Deeper Underground Mining Operations in the 2585-Acre Mine Beneath Our Local Surface Objectors.

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The disputed DEIR (eg, at 4.8) speaks to irrelevant data from the past about this long-closed mine and fails to address not only the "new normal" of drought and climate change. However, it also ignores the burdens, risks, and harms to be expected from the renewed mining operations. What is the point of data about the 72 miles of existing tunnels in the 2585-acres of

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underground mine (where the surface above and around it is owned and used by us objecting locals, without satisfactory DEIR analysis), when the DEIR plan is to change everything underground by 24/7/365 blasting, digging, dewatering, removal of rock, and other mining work in new, expanded, and deeper areas for the next 80-years? The DEIR assumes incorrectly that there will be a "balancing" by "recharged" water from above or elsewhere in the relevant local water sources replacing what is wasted by dewatering the mine and disposed of downstream in the Wolf Creek. But how is that possible without addressing the future mining changes, as well as the future drought and climate changes? See my discussions at 3.A, D, E, F, 5 and 6. Ironically, much of disputed DEIR # 4.8 addresses how they can more efficiently dewater the mine, which actually increases the risk of harm to the rest of us co-owners of that shared groundwater, who see our groundwater as an essential resource to be conserved, rather than a burden to be discarded somewhere else downriver as inconvenient to profitable underground mining. Note that all the discussion of groundwater movement is about its passage through rock fractures. When the disputed DEIR mining continually blasts, tunnels, digs away, and removes the deep mine rock, that must affect those rock fractures and resulting water flows, but nothing in the DEIR adequately analyzes that fate because, among other things, the DEIR has not analyzed the 2585-acre underground mine where they are repairing the old mine closed and flooded since 1956 and the new, deeper, and expanded areas for new mining. Consider the following DEIR comment (at 4.8-19), especially in the context of that 24/7/365 blasting, tunneling, digging, rock removal, and other mining activities for 80 years:

> ...the shafts act as "wells" that constantly draw groundwater from the surrounding shallow bedrock (ie, above a depth of 500 feet, where the transmissivity is highest). The inflow of water into the shafts should create a local depression in the groundwater table surface around the shafts referred to as a downward cone, or cone of depression. [See DEIR Figure 4.8-7]

What that says to those of us living on or using the surface above or in the surrounding "stigma zone" of the underground mine, is that they will be even more effective than we feared in drying out OUR groundwater and fractured rock aquifers there and creating subsidence risks. Remember that the Rise SEC Form 10K quoted in my # 2, admits that us competing surface owners own the first 200 feet down as part of our "surface" that they cannot enter or use without our consent, which the mine has not requested and is unlikely to obtain.

What is the legitimate use, relevance, or persuasive purpose of disputed DEIR Figure 4.8-8, entitled "Simulated Drawdown of Groundwater Levels Under Current Conditions?" Not only are those "current conditions" irrelevant in the new normal of drought and dryness from climate change impacts in the next 80 years, but the mining itself will radically change those current conditions in unexplained ways and by mining into new, expanded, and deeper places with unknown underground conditions. Nothing in the disputed DEIR satisfactorily addresses those issues and concerns. Therefore, the use of such old data, especially without addressing why it is not likely to be predictive of the future, seems to invite misunderstandings or worse. See my # 3.M.

Besides ignoring the reality that we can no longer judge the climate changed future from the past, the disputed DEIR makes an even wilder disputed and unsubstantiated

"assumption" that mining problems become less or fewer somehow the deeper they mine. (Why doesn't that new deeper and expanded mining increase the risks, like the old saying about the deeper you dig, the farther you fall?) Nowhere is that unsubstantiated DEIR assumption proven, and us local should not have to rely on nothing better than such faulty, self-serving so-called logic that seems to be just wishful thinking. Consider the disputed DEIR assurance (at 4.8-51) on which us locals are expected to risk our homes and future (for Rise's exported profits and no net benefits as discussed at my # 4.):

> The proposed mining areas would primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at greater depths, typically more than 1,000 feet below the surface and deeper. At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, due primarily to the lack of open fractures because of the large pressures exerted by the overlying rock mass (ie, the lithostatic pressure). Given that the new mining activity would occur at equivalent or greater depths than the proposed [sic?] mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater in the domestic supply wells that are completed at much shallower depths.

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That is subject to many disputes I discuss throughout my Objection. I note here, however, that there is no supporting discussion of the effect of such deep mining on the actual, undescribed conditions that may be uncovered at those depths (eg, bigger fractures from blasting? underground rivers or aquifers increasing dewatering depletion?). More importantly, because of drought and climate change, us locals and our governments or other organizations will have to start competing with the mine for our own owned water at depth during the 80 years. See my #'s 3.N, 4, and 5.

Speaking of stigma complications that make our local problem even worse, the disputed DEIR admits in its dewatering discussion (at 4.8-42 to 51, especially at 46-49) that it intends to use "underground paste backfill" (ie, material glued with "cemented-paste backfill") that is (incorrectly) described as "environmentally benign" BUT WHICH IS TOXIC, 'HEXAVALENT CHROMIUM' OR "Cr+6." For those who never saw the reality horror movie "*Erin Brockovich,*" read Wikipedia's (or other) accounts of the "Hinkley groundwater contamination," about how a utility used that chemical and dumped wastewater in spreading ponds in Hinkley, California, (now a toxic ghost town) and ultimately had to settle a class action with the local victims or their estates for $333 Million (back when that was serious money). While the disputed DEIR alerts no one to this threat (and rarely mentions Cr+6 by name and then not in the main DEIR hazardous substances chapter 4.7, attempting (without revealing any health risks and issues) to minimize any future concern by describing the exposures as if they were tolerable, a Google search of "hexavalent chromium" will reveal even more serious health hazards than the movie. Indeed, the European Union is banning the chemical starting in 2024. See the EPA website's toxic discussion for a library of negative reports and studies. Even if one were to join the DEIR in ignoring the science, government should be more serious in its analysis, and, in any event, the already "significant" stigmas from this mine will now become much worse for real estate values and tourists, when people start talking about our area as the "next Hinkley."

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Putting aside for the moment that toxic Cr+6 Hinkley problem and stigma (see my #'s 3.C, G, H, and 7), that whole dewatering mess is compounded by the disputed DEIR again incorrectly assuming that the past reliably reveals the future (see my # 3.M). For example, the DEIR admits (at 4.8-51) that:

> The water ... from the underground workings is anticipated to have similar quality to the water that currently discharges from the existing drains. ... Therefore, the conditions after mining is completed would be like existing, or baseline, conditions, such that seeps ...would not represent a potentially significant impact under CEQA [where it just addresses the iron and manganese issues and tries to further diminish the appearance of risk by describing how the new mining is going to be deeper]. *** Although the projects proposed water management and treatment, and adherence to permit requirements, would avoid significant impacts to water quality, the impact is considered **significant** for the purposes of this analysis and mitigation, specifying requirements for regulatory compliance, is identified as necessary to reduce the impact to less than significant.

Even if there were compliance and a proper end to mining as disputed DEIR assumes (but many locals are skeptical for various reasons, including in my case what is discussed in my # 2, from my bankruptcy/cross border bankruptcy, insurance insolvency and other professional experience in dealing with hundreds of failed mines as to why there are more than 40,000 abandoned and dangerous mines in California on the EPA list), the DERI cannot scientifically assume the climate changed future will duplicate the past, as it does for the average rain from 1967 to 2017. Besides the new normal of drought, dryness, and climate change that I discuss, only an irrational person or worse would assume that you can add Cr+6 and other things to the mining process and blast, dig, remove rock (whether 500 or 1000 tons a day), and mine 24/7/365 for 80 plus years without materially change things from their past condition. Indeed, who else but a wishful thinking miner or worse would imagine that the future environmental, toxic, and safety regulations and standards will still be as lax as they are now?

D. Opportunity Costs If the Mine Is Approved And Prevents More Beneficial Community Uses of the Land, Water, And Other Resources, Including Our New Competing Wells And Air Quality Capacity

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As discussed in my # 4 and elsewhere herein, there is no net benefit from this mine to the local community that it burdens, risks, and harms in many ways addressed by objectors, including us neighbors most impacted (not to mention those businesses dependent on tourists who may be scared away.) Among the less obvious considerations for the applicable governmental authorities and regulators is the "opportunity cost" of the mine crowding out more beneficial uses in the next 80-years, and the inevitable disputes that will arise and persist as us local citizens resist and challenge mine burdens, risks, harms, and worse to enable better and more desirable uses. See my # 3.N. For example, the disputed DEIR makes much of what it calls the "relatively few domestic water wells" in what it considers the relevant East Bennett

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Road area (DEIR at 4.8-8 et seq and Figure 4.8-4), but that ignores hundreds of other existing wells sharing the same groundwater plus the fact that all of us thousands of surface owners and users above or around the 2585-acre underground mine have our competing rights to drill competing wells for our use to counter the likely future depletion of our own groundwater by such mine dewatering transfers 24/7/365 downriver for 80-years. Indeed, whether we are competing with the mine in the future for water, also consider the right to burden the air within the quality standards etc, by our beneficial community uses competing with those nonbeneficial mine uses. Are we to stop using wood stoves and burning debris from our fire defense work, so that the mine can exhaust the local tolerance standard for such air pollution? How much should the community tolerate from such mine impositions that crowd out such superior or more desirable competing uses for the next 80 years? Stated another way, how can the mine claiming to be in compliance with the Water Elements of the Nevada County General Plan Goal 11.1 etc and Mineral Management Goal 17.1 etc (eg, the related Policies) as they clearly must adapt to the drought and climate change conditions in the future during the next 80 years?

6. "Geology, Soils, And Mineral Resources" at DEIR #4.6 Again Ignores the Critical 2585-Acre Underground Mining Issues Over Which Locals Like Me Will Continue To Object

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Among the most serious and strategic deficiencies in this disputed DEIR are its chronic attempts to pretend this CEQA "project" is about the small surface lands called the Brunswick Industrial Site (and, although the DEIR incorrectly attempts to separate it from what is one CEQA project, the Centennial Industrial Site), ignoring the core environmental impact and threat: the 2585-acre underground mine below or adjacent to the affected homes of thousands of local residents (like me) living on and using that surface, forested, suburban community. See my # 3.A and E, and 14, as well as my supplemental CEQA brief. The disputed DEIR addresses 30 or 31 wells along East Bennett Road as if that were the only project or underground issue, when that is merely the distracting "tip of the threatening iceberg." This reality is demonstrated in DEIR section 4.6, where we learn nothing useful about that 2585-acre underground mine, which is the central focus of most of my and other locals' objections. Since the mine has been closed since 1956 and, because flooding prevents easy study, neither the existing mine nor the new, expanded, and deeper contemplated mining are addressed by satisfactory or CEQA sufficient analysis or commentary. See, eg, my # 3.A and E. As a result, when facing such absence of critical data, the old saying is true that "it is better to be safe than sorry." That absence of critical, credible, and useful data in the disputed DEIR regarding the burdens, risks, and problems threatening us surface owners and users above and around the 2585 acre mine convinces us locals that, to twist a cliché, "what we don't know will hurt us." Moreover, given the admitted financially questionable condition of both the miner and the mine in Rise's current 10K and 10Q (eg, my # 2), the disputed DEIR cannot be approved without understanding far more about that 2585-acre underground mine the DEIR largely fails to evaluate or even disclose.

As explained in that current Rise 10K (and my # 2), the "surface" areas in perpetual competition with the 2585-acre underground mine extend exclusively to the surface owners'

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sole benefit for the first 200 feet and infinitely deeper for groundwater and other nonmineral rights (as is true for the adjacent landowners.) However, despite the obvious opposition of most informed locals, the disputed DEIR not only ignores the underground mining burdens, risks, and harms in this and other objections, but also the consequences on the mining and economics which the DEIR insists at 6-14 must continue constantly 24/7/365 for 80 years or else unexplained problems will arise that make the mine infeasible. See, eg, my #'s 4 and 13. Since our resolute, local legal and political opposition *and competition* will continue indefinitely as long as the mine operates, the disputed DEIR cannot ignore those issues and the local objections, because local legal, political, and competitive self-defense reactions and counters could continue to have their own impacts on the mine. See my # 3.N. Most importantly, when the disputed DEIR purports to describe "Impacts and Mitigation Measures," such as at 4.6-26 et seq., the DEIR utterly fails, because it not only refuses to confront reality (eg, climate change dryness and drought) and us local's many meritorious objections, but also even the basics CEQA concerns about the 2585-acre underground mining itself. See, eg, for example, my #'s 4, 2, 14, 3.A, B, C, D, E, F, G, H, J, and L, such as focusing on depleting the NID and groundwater supplies, hexavalent chromium toxic cement in mine shoring, air quality concerns, financial feasibility questions, and the no net benefit nature of the mine.

The disputed DEIR is also deficient as to the revealing adverse mining effects on our shared/co-owned groundwater (see, eg, my #'s 3.D, E, and F and 5), on the many deficient mitigation measures (at 4.6-47 et seq) that must fail, because the DEIR declines to admit the real burdens, risks, and problems, and on the mine "subsidence" (eg, failure to provide as the law requires subjacent and lateral support for our surface, as addressed at my #4) and "Collapse" risk (eg, discussed at DEIR 4.6-44 to 47, as limited to "near surface mine features," and by me as the 2585 acre mining threat to our local owners and users of the entire surface above and around that mine [aka protection against "subsidence"] down at least to our 200 feet level called the "surface" in the Rise SEC Form 10K described mineral deed (at my # 2), as well as other risks, burdens, and problems. I note that, before its insufficient mitigation proposals that DEIR "Conclusion" admits at 4.6-47: "**Therefore, a *significant* impact could occur with respect to being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquification, or collapse, of be located on expansive soil, as defined in Table 18-1B of the UBC." Since the disputed DEIR does not evaluate the current condition of this mine flooded since 1956 or the underground conditions where the DEIR expects new, expanded, and deeper mining work 24/7/365 for 80 years, the DEIR cannot credibly assure any of us on the surface above or around that 2585-acre underground mine of CEQA or other legal compliance.**

If the governmental decision-makers have any doubts about the seriousness of the many errors and omissions in the disputed DEIR relating to the 2585-acre underground mine, I suggest that (besides reading my Objection and others, including the written follow-ups to the comments of the more than 100 local objectors at the March 24. 2022, County hearing) you should consider the grossly deficient discussion of the mine impacts whenever they stop mining, whether in 80-years with vaguely promised compliance with applicable laws, or because the mine ceases to be economic, or because the miner ceases to be able to afford to operate. See, eg, my #'s 2 and 13 and my rebuttals to the DEIR 4.3-103-104 deficient response

on that topic. There are more than 40,000 abandoned mines in California on the EPA list for such reasons. Years ago, I was lead counsel for the liquidator of nation's only then AAA surety/insurance company issuing mine reclamation and closing bonds for thousands of mines here and elsewhere. I see no sign of any insurance or security for the performance of those DEIR mitigation, closing, and reclamation promises. Instead, I see nothing but serious cause for concern about any such capacity to perform those obligations, even if (unlike many such foreign controlled mining subsidiaries) they didn't follow the common practice of retreating across the border with their profits and abandoning the mine, depending on the circumstances either with or without the common US and cross-border bankruptcy strategies designed by many industry miners to disappoint US creditors and governments. See my #2. Since local governments could inherit a local mess here if they approve the DEIR and mine, without surety bonds, insurance, or practical, sufficient recovery options from the foreign investors who took the profits, consider carefully whether CEQA compliance exists (see my #'s 3.E, 4 and 14 and my supplemental CEQA brief), and whether decisionmakers can rely on the DEIR accomplishing what it states, even to the small part of the burdens, risks, problems, and issues they deficiently purport to address. If you wish a case study, consider the hexavalent chromium being used to shore up the new, expanded, and deeper mining (eg, my #'s 3.C, G, and H and 7), the toxic substance that killed the town of Hinkley, California, and many residents, as illustrated in the movie, *Erin Brockovich. Despite the European Union ban starting in 2024 and thousands of negative reports and studies on the EPA website against using such Cr+6, this disputed DEIR does not even reveal that such a controversy exists in its Chapter 4.7 entitled, "Hazards And Hazardous Materials." Instead, it is just a passing reference in a deficient discussion of the underground mining plan to use that toxin in the cement paste rock shoring in the new, expanded, and deeper mining being dewatered 24/7/365 for 80 years and after some questionable "treatment" disposed of downriver somewhere else, where I gather it becomes a problem for NID and its downriver customers.*

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7. **The DEIR "Hazards And Hazardous Materials" Discussion at its # 4.7 And Elsewhere Is Deficient, Omitting Entirely At Least One Serious Hazardous Material (Hexavalent Chromium/Cr+6 of Erin Brockovich Movie Infamy For Turning Hinkley, CA Into a Ghost Town at Great Cost to Local Victims And Property As Explained In My #'s 3.C, G, and H)**

The disputed DEIR presents at # 4.7 what it incorrectly represents to be a CEQA compliant discussion of all the environmental concerns relating to "Hazards And Hazardous Materials," although it defers as to the fire hazard issues to its Chapter 4.13 and deficiently addresses the fire smoke threats there. (This Objection at my # 10 addressed that as part of our air quality concerns (my # 11) with fire smoke problems created by the mine's 24/7/365 depletion of groundwater for 80-years making our forests above and around the 2585 acres of underground mining more vulnerable to fires, adding to our drier future weather, chronic drought, and other climate change problems). **What the DEIR also fails to address at all is the threat of highly toxic hexavalent chromium that the European Union has banned starting in 2024 on account of thousands of negative studies and reports (see the EPA website or even Google the words) and which has been blamed at a utility facility for destroying the lives and**

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property of everyone in Hinkley, California, (now a ghost town made famous by the *Erin Brockovich* reality horror movie), resulting in a massive class action settlement in favor of the local victims and their estates. I already focused earlier in this Objection on this dangerous chemical where the disputed DEIR did mention it in cement paste claimed to be "benign" in a deficient discussion of the underground mining and dewatering, where the DEIR occasionally reveals in passing that Cr+6 will be used throughout the mine in the cement shoring 24/7/365 for 80-years. Therefore, I will not repeat my Cr+6 concerns here, but refer you to my comments a #'s 3.C, G, and H. My reason for this mention here is that the DEIR appears to have chosen to misdirect readers away from the well-known controversies about hexavalent chromium to a few seemingly innocuous references buried in the DEIR's mining and water discussion, as if Cr+6 was just another construction material and without any warning to readers about these serious controversies. By analogy, this is the equivalent of failing to mention the use of asbestos in a CEQA discussion of a construction project's hazardous substances during that period when asbestos industry defendants were commonly being forced into bankruptcy by massive (and meritorious) victim litigation victories and negative press and scientific reports, but before the asbestos reality and science was officially banned by the lax regulators (where there always seems to be a lag on account of politics and industry money, as with cigarettes and opioids).

Thus, I refer here to only a few other obvious errors in DEIR #4.7, relying on other objectors to deal with the arsenic and other substantive hazards issues as to such DEIR errors and omission. As noted above in my # 1, I incorporate the oral and written objections from those organizations and qualified experts who have exposed the many other hazards, such as asbestos, arsenic, and other things. First, I note that the disputed DEIR again misplaces the disputed discussion of the mine history and conditions at 4.7-2 et seq, when that information is more important to those reading the water and mining sections, where this context is more needed but omitted. Also, there is no discussion about the changes in the mine from being closed and flooded since 1956 or from what will happen when the new underground mining expands deeper into the unknown areas as to which the DEIR reports no data as to hazards. For all we (or presumably they) know that new, expanded, or deeper mining could be unleashing more dangerous quantities of the asbestos, arsenic, and other toxic substances already identified or even to expose us to new hazardous substances dangers not even mentioned as possible in this disputed DEIR. **Just because the DEIR miner is willing to blindly blast, tunnel, and mine into the unknown in that 2585-acre mine beneath our homes and property does not mean that us locals must tolerate that failure to comply with CEQA and the need for this kind of essential information. See my # 14.**

Second, there is a key error that I have discussed elsewhere in many parts of the Objection, where the DEIR erroneously, and in a seriously misleading way, describes the CEQA "project," as if it were just the small area of the Brunswick site plus 30 dry wells along East Bennett Road (and should include the Centennial site, which the DEIR incorrectly calls a separate CEQA "project"), rather than the 2585-acres of underground mine beneath us locals, where the bigger problems lurk, often unaddressed in the DEIR or discussed in an unsatisfactory and disputed manner there. See my # 14 and my supplemental CEQA brief. That disputed DIER discussion of "Project Area Conditions" incorrectly states that the Brunswick and Centennial sites are "surrounded by undeveloped land, industrial, low-density residential

developments and commercial uses," which it two sentences later describes as "rural residences." See my # 8 and 3.N. As stated in this and other objections Banner Mountain is a suburban area (although with huge trees) with thousands of people living in homes whose groundwater will be impacted by the 2585-acre mine whether they have competing wells now or drill them in the future when NID cuts back or climate change in the next 80 years forces us to do so. See #'s 3. M and N and 5.

In any event, I am also in the larger "stigma zone," where our community properties above and around the 2585-acre underground mine all suffer depressed real estate values due to the DEIR mining threat that would increase if the mine were allowed to reopen. As discussed in my #'s 3.N, 6 and 8, I remind the DEIR government decision makers that there are thousands of us local resident voters to be burdened, harmed and at risk from the DEIR underground mining, far more than the small number of new jobs for mine workers coming here from somewhere. From the standpoint of the local neighbors and our community (which the California Supreme Court considers having special rights in such cases, as discussed at my # 4, discussing the constitutional rights of those downwind of the new sewer plant for compensation on account of their disproportionate suffering), there is "no net benefit" to this project. As explained in my #'s 4, 8 and 14, a related topic which should concern such government decisionmakers is that, when the DEIR is mining in the 2585 acres below surface properties owned or used by neighbors and our community, they are subject to our competing surface legal rights (down at least 200 feet), for example, not just to our shared underground water, but also to subjacent and lateral support and other protections against subsidence. See, eg, my # 4 and 14. Why none of this is revealed in the disputed DEIR is unclear, but it raises certain credibility concerns at a minimum.

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Note that, when the disputed DEIR discussed those "Mine Conditions," it only talks about its "NVS Phase I/II ESA" for the small surface sites and 10-foot-deep trenches; not the 2585-acres of long flooded underground mine that no one has apparently seen since closure in 1956 [DEIR at 4.7-2]. More importantly, not only is the current dangerous condition of the mine not satisfactorily described, but there is no satisfactory attempt to assess the hazards or risks from the new and expanded mining at deeper levels, as addressed in my #'s 4, 8, and 14. How can the disputed DEIR pretend that it is accurate or sufficient or CEQA compliant where it has not satisfactorily addressed the actual new underground mining concerns and risks in the 2585-acre underground mine beneath and near thousands of surface homes and improvements? The DEIR just assumes incorrectly that its cursory investigation of another part of the owned mine site and 30 wells along East Bennett Road is somehow sufficient, and that whatever it thinks it learned from the past before the 1956 closure and flooding will apply to the new mining in the future. Such erroneous and irresponsible assumptions are contrary to CEQA, logic, and prudent public policy. See my #'s 3.E, 4, 14, and my supplemental CEQA brief. See also, CEQA Guidelines section 15064(b) and many supporting court precedents requiring that the evaluation of the impact's "significance" must be based "to the extent possible on scientific and factual data." Also see, the California Supreme Court's in the *Sierra Club v. County of Fresno* case discussion in my #14 of the requirements for the sufficiency of an EIR to be judged by what is "reasonably feasible" (at 515) or what CEQA Guidelines #15364 calls "what is reasonably feasible." From the perspective of any reasonable person, much more was required from the disputed DEIR that is relevant and useful than the insufficient and often irrelevant mass of what was shared in the

DEIR. (Too often the DEIR just fills pages with either disputed or less useful history about things less relevant to the "new normal" about the new and expanded and deeper mining or chronic drought and climate change in the future that the DEIR either ignores entirely or addresses in an insufficient or unsatisfactory manner. In some ways I learned more about the mine in the Rise current SEC Form 10K report discussed at my # 2 than in this disputed DEIR.

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Also, while the DEIR acknowledges (at 4.7-19) that in CEQA Guidelines Appendix G there are special concerns for nearby airports (as we have here of great importance to us locals for its important use in our wild fire defense), the disputed DEIR ignores the underground mining occurring in the 2585-acres under the airport surface area (which is also not owned by Rise) and instead deals (# 4.7-3 at 4.7-36 and #4.7-5 at 4.7-49) with this airport as if the only impacts were from the small Brunswick and Centennial sites along East Bennett Road.

8. **Land Use And Population And Housing" DEIR at # 4.9**

The entirety of my Objection demonstrates material errors, omissions, and flaws in the disputed DEIR claims in its # 4.6 for the mine to be "compatible" with "existing land uses in the area and [to] identify any incompatibilities ..." While the DEIR deficiently mentions some, but not many, of the pertinent CEQA required things about the 2585-acre underground mine, most readers would not realize from those DEIR descriptions that there are thousands of our suburban residences (like my home) on the surface above or around that 2585-acre underground mine or within the larger adjacent surface "impact zone" (eg, where we locals have competing groundwater rights against the mine) or "stigma zone" (eg, where the nearby mine will depress our property values and threaten other rights.) See, eg, my #'s 2, 3.A and N, 4, 5, and 14. I live on Banner Mountain in the neighborhood just above Idaho-Maryland Road and the Wolf Creek, which is a large suburban area that would be considered a normal suburb, except for the fact that it is full of huge trees that we want to protect from the consequences of

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mine dewatering beneath us 24/7/365 for the next 80 plus years, without adding mining to such environmental stresses from the new normal drier weather and chronic drought from climate change that the DEIR entirely ignores. See my # 8 and 3.M. My property is two other properties uphill from Idaho Maryland Road and Wolf Creek mentioned often in the DEIR. Just within the fenced acre around my house I have 48 trees taller than 50 feet and some heirlooms, all in need of my groundwater that is at risk to the mine (with more such trees in my lower 2 acres). However, like most of my neighbors with similar trees and situations, I still do not know for sure (and the DEIR does not reveal) whether the DEIR will be trying to mine directly underneath my surface owned property, or whether instead (as seems most likely) I am only in the adjacent impact and stigma areas, where I will be competing with the mine, for example, for underground water with my own future well (as will all us locals who can afford to do so) when the droughts inevitably cause NID to cut back on its water deliveries (whether because NID lacks either lacks sufficient water of its own, or because government reallocates NID water to more desperate places). See my # 3.M and N, and 8

These thousands of us voting residents above and around the 2585=acre mine cannot be dismissed by the DEIR (as we now incorrectly are) as implicitly expendable "rural residences around the site" (which is a misleading DEIR reference I expect only to the area

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just around the small Brunswick and Centennial sites owned by Rise). In any case, such DEIR attempts to diminish our surface owners' rights is materially misleading and fatal to the entire DEIR. See my # 3.A, E and N, 4, and 14. Why? Because by threatening our property values, environment, and way of life for us thousands of local SUBURBAN resident voters, the DEIR could trigger not just perpetual legal and political disputes and resistance to the disputed DEIR mining, but also competition for our shared resources with us locals exercising our own property rights, such as to our shared NID and groundwater. See my #'s 3.N, 4, and 14. Because of the admittedly economically fragile (and I believe infeasible) condition of the DEIR plans (see my #2 and DEIR admissions at 6-14), those perpetual disputes and competition with us locals at risk doom the long-term viability of this DEIR mine, raising one of many questions not addressed by the DEIR: What happens when we stop the mine after it starts? See my #'s 13 and 15 and my many rebuttals (eg, my # 3.K) to DEIR's "Non-CEQA Analysis" at its 4.3-103-04. (Hint: the reality is that it would be best never to reopen the mine than to stop and start, but the sooner it stops the better.) That should be obvious from what should have been disclosed in the DEIR, which, however, never acknowledges the full reality for us living above and around the 2585-acre underground mining, including by usually focusing only on the fewer around the small Brunswick and Centennial sites and 30 wells along East Bennett Road.

Such DEIR flaws lead to absurdity, since us surface owners and users above and around the 2585 acre underground mine have the greatest conflicts with the DEIR and the mine, as you would expect when this no net benefit mine is threatening to trash our property values, environment, and way of life, while imposing many new burdens, risks, and problems on us, such as draining our ground water for transport downriver somewhere else at a time of chronic climate change dryness and drought, as described in my #'s 3.A,B, D, E, F, and M, 4 and 5. Contrary to DEIR #4.9.4 "Impacts And Mitigation Measures" (including cumulatively as stated at 4.9-27), the disputed DEIR cannot satisfactorily resolve such burdens, risks, and problems about which locals like me complain, when the DEIR wrongly ignores or consistently underestimates our such concerns, as illustrated in this Objection and others. **Despite all these errors,**

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omissions, and deficiencies, somehow the disputed DEIR demands at 4.9-19 an 80-year mining permit for 24/7/365 operations in the alleged interest of ensuring "consistency with all other plans and policies," all without addressing our local concerns or even providing data beyond 20 years (or after 2040). See my # 3.M. The disputed DEIR "Conclusion" at 4.9-24 by errors, omissions, and deficiencies is wholly wrong to allege the following unsubstantiated opinion: "Overall, the proposed project would not cause a significant environmental impact due to conflicts with a land use plan, policy, or regulation ... therefore, this impact is less than significant. "(I will not repeat the words of my initial reaction to reading that worse than nonsense, but that general contempt seems to be the most common reaction to this DEIR effort to promote another "alternative reality.")

9. "Noise And Vibration" DEIR at 4.10

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Noise and vibration are among the many issues of local concern that the DEIR chooses to ignore regarding the 2585-acre underground mine by pretending that the CEQA "project" is

mostly just about the Brunswick or Centennial site and 30 wells along East Bennett Road. (The disputed DEIR also purports to treat the Centennial site as if it were a separate CEQA "project," which it is not.) While DEIR #4.10 cites to technical experts (eg, Appendix L and M for noise and blasting), it is not even clear from the DEIR that they asked them the right questions about the 2585-acre underground mine beneath thousands of us surface owners and users, such as are illustrated in my Objection and others. That is why CEQA court

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interpretations forbid such vague cross reference in a DEIR to such allegedly supporting materials, as I illustrate in my #1 # 14 and detail further in my supplemental CEQA brief. (Remember the old saying that often applies when someone manipulates data by how they ask the wrong question: "garbage in, garbage out.") If those responsible for the disputed DEIR do not ask the right questions, they cannot produce correct and useful answers. If those responsible did ask some of the right questions, but declined to share the full answers, that also must cause the rejection of the DEIR, among other things.

Based on the noise and blasting reports in Appendix L and M and the absence of clarity on this issue, it appears that the disputed DEIR only attempted to study the small Brunswick and Centennial site areas owned by Rise, but not the key 2585-acre underground mine where thousands of us suburban residents live on the surface above or around that continuous mining noise and blasting. Certainly, the DEIR maps for sensors don't show any sensors where thousands of us live above the 2585-acre underground mine. (For example, the testing and proposed monitoring/"sensitivity receptor" locations, like shown on Figure 4.10-2 and -3, do not include the areas where us mine opponents are living above and around the 2585-acre underground mine.) Since the disputed DEIR admits (see, eg, my #'s 3.A, B, C, D, E, F, G, H, J, L, and M, and 4, 5, 6, 7, 8, 9, and 10) that mining involves 24/7/365 blasting, drilling, rock removal, shoring up with toxic hexavalent chromium cement, and other noisy and vibrational activities under the 2585-acre underground mine above or around which surface thousands of us live, we naturally want to know how much our houses and trees will shake, vibrate, or otherwise react, as well as what noises will be heard by us or our animals. DEIR Appendix L and M describe principles, some of which are alarming, but they do not apply those principles to where we live above and around the 2585-acre mine beneath us.

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Consider, for example, the brief discussion of the so-called effects of ground cover, which the disputed DEIR admits at 4.10-24 is a key variable, stating the principle to be: "The degree of sound absorption applied to each noise source at each receptor varies depending on the type of ground cover and distance between the noise sources and receptors. … Where the ground between the noise and receptor consists primarily of hardscape, the model applied positive offsets to account for reflections of sound from those surfaces." **Applying such principles to the area above the blasting and mining in the 2585-acre mine area directly below or around our living surface where they omitted and ignored "receptors," why should we not expect the fractured hard rock directly between us to carry even what the DEIR 4.10 and Appendix L and M would consider prohibited amounts of noise and vibration into our homes above and around the 2585-acre underground mine? Telling us to relax, because the noise and vibration from the Brunswick site is too far away to hurt us, ignores the fact that the source of our threat is not just at the Brunswick site, but also under our own property!**

Consider, for another example, the disputed DEIR at 4.10-52 to 59, where they discuss blasting at where they put "receptors" at the Brunswick and Centennial sites to consider

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"nearby residences" TO THOSE LOCATIONS [BUT NOT ABOVE OR AROUND THE 2585 ACRE UNDERGROUND MINE WHERE THE ACTUAL BLASTING AND MINING IS OCCURRING UNDERNEATH US]. THIS CANNOT BE A MERE OVERSIGHT, BECAUSE THEY CONSIDER THE BLASTING EFFECT AT THE MORE DISTANT HOSPITAL AT 4.10-55 AND DOWNTOWN GRASS VALLEY AT 4.10-56. SO, WHY IGNORE THE MOST IMPACTED AREA ABOVE AND AROUND WHERE THE ACTUAL BLASTING OCCURS IN THE 2585-ACRE UNDERGROUND MINE? DO THEY THINK WE WON'T NOTICE UNTIL THEY THINK IT'S TOO LATE? What good are the more distant mitigation "Ground Vibration Monitoring Program" devices that do not report the most relevant blasting and mining noise and vibration at its source below the feet of the thousands of us resident voters living above and around the 2585-acre underground mine? Please note, mistaken approval of this disputed DEIR would not end the resistance to these 24/7/365 threats for 80 years from those of us above and around the 2585-acre mine and delaying legal and environmental justice for us locals will make everything worse for all concerned.

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There is no satisfactory answer offered in the disputed DEIR to those and other questions in this Objection (see, eg, my # 15), which evasions by themselves should be sufficient to reject the flawed and deficient DEIR. If the correct answer were that the hundreds of feet of rock between their mining and our surface were a sufficient insulator, why not tell us that? We can only assume that they would share any good news, even if there were something they could also try to "spin" (as the DEIR often does) as if it were good news. Therefore, we assume there are some inconvenient truths that they do not want to share with us. For example, with that maze of old and new underground tunnels in the 2585-acre DEIR mine beneath where we live on the surface, will all that underground noise and vibration be magnified or echo or otherwise broadcast to the surface? If government decision-makers do not compel complete and truthful answers on this and other burdens, risks, and harms, and they approve this deficient DEIR anyway, they will share the blame for the predictable reactions of thousands of local residents enforcing competition, legal and political rights as described in my # 3.N.

10. Some Air-Quality Errors And Omission to Consider from DEIR #4.3 And Elsewhere

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As a general matter, I defer to other objectors whose work I incorporate on the air quality risks and problem. Nevertheless, I note some illustrative errors and omissions, and I describe the way that this private project with no net benefits to our community (see my # 4) could crowd out other opportunities for our people and more desirable businesses to use the air within the safety tolerance margins. **Consider, for example, that this 24/7/365 mining for 80 years is going to exhaust our pollution tolerance capacity, so that new and beneficial businesses cannot come here to operate. Worse, mine operations will reduce the opportunities for us locals to continue our historical practices, such as to burn our leaves and cuttings to reduce fire risks, and, as the regulations get stricter even prohibit burning wood fires (as is occurring already, for example, in Contra Costa County in the Bay Area, because of the oil and gas production facilities there exhausting the tolerance standards.)** In the future that is ignored by the disputed DEIR, which resolutely looks only to the often-irrelevant past, that is a poor means of predicting our future with climate change, when all of us would be

competing with this DEIR mine over what we can do without exceeding the aggregate limits of what is tolerable in our decreasing environment. Whatever that tolerance margin is from time to time, this mine will be exhausting too much of whatever is left available for the rest of us locals and for more desirable newcomers, unless we can at least subordinate the mine's pollution rights on the basis that people and desirable businesses should have priority over undesirable, burdensome resource exploiters like the mine that add no net value to our lives and export their profits elsewhere. See, eg, my #'s 3.N and 4.

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More importantly, mine efforts to reduce its air pollution, especially of dangerous materials (eg, asbestos), has adverse effects on our other local environmental concerns. For example, the disputed DEIR admits (at 4.3-49) that they "assumed that about 11 million gallons [of water] would be required [ie, wasted] for construction dust suppression." Even worse, the DEIR states on that same page in discussion of the mine's "Surface Fugitive Dust Controls": "To account for dust control measures ... the assumption was made that that active work sites would be watered at least two times daily, resulting in an approximately 55 percent reduction of particulate matter." However, when chronic climate change drought and water controls limit NID and other water use, as is ignored in the DEIR, but nevertheless is inevitable as an inconvenient truth, that means either (i) our precious water will be wasted for such "dust control," or (ii) our particulate air pollution will be 55% worse than projected from the mine, leaving the obvious solution to that dilemma of simply shutting the mine that never should have been reopened in the first place.

Incidentally, this is another "bait and switch," since all that water waste was not disclosed where it should have been in the DEIR water discussion that was already deficient (see my # 3.E). By separately burying those details here, the DEIR creates confusion and conflict, because we don't know how this water use relates to the depletion concerns, we have not just from our groundwater, but also from our competing rights to NID, as we blunder further into shortages on account of climate change droughts and dryer weather that the disputed DEIR ignores.

11. "Wildfire" DEIR at 4.13

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As discussed at my #'s 3.A, B, D, E, F, K, M, and 5, the depletion of our groundwater below the surface on which thousands of us live above or around the 2585-acre underground mine threats to amplify the harms to our local forests and plants from the drying and drought from climate change. That mine and dewatering work and water waste could harm our already overstressed forests and plants, adding many other adverse environmental side effects, such as more fire smoke (from drought effects increased by the mine increasing fire risks, as described in my #'s 8 and 10) to further erode our air quality concerns. The DEIR errors and omissions regarding its electrical generator backup discussion and Public Safety Public Shutoffs (PSPS) also need to be addressed, as described at my # 3.J and 10, for example, also harming our air quality with much greater backup generator use than the DEIR imagines and competing with more important uses for our tolerable air than this undesirable mine adding no net benefit (see my # 4). All these and related matters dealing with the 2585-acre underground mining activities are ignored or insufficiently addressed in this disputed DEIR's 4.13 wildfire discussion, including as

to what such matters add to the cumulative impact errors and omissions at 4.13-28. See my fire smoke discussion in my air quality objections above at #'s 3.J and 10.

12. Errors And Omissions As To the "Statutorily Required Sections" At DEIR # 5

A. Introduction

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This section overlaps with the many errors, omissions, and deficiencies which I have addressed throughout this Objection, as well as responding to additional problems with DEIR #5. Unlike elsewhere in this Objection, where I have organized my comments around logical or other important concerns, rather than the often dysfunctional and strategically obscuring approach the DEIR uses in spreading its data in less subject related areas, for these CEQA Guideline section 15126.2 matters I will comment here on each topic in the order presented the DEIR, rather than in order of importance or of my personal priority impact concerns.

B. "Growth Inducing Impacts" DEIR # 5.2

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I defer on this topic to other objectors who I are better qualified to address this topic. See my #'s 3.N and 8. However, I note that our problem may be the opposite: that the mine destroys the kind of quality growth opportunities we want for attracting desirable people and businesses by this undesirable mine exhausting our capacity to deal with climate change, margins of tolerance for environmental stress, water shortages, our already grade F air quality, etc. Apart from the trivial number of miners attracted here for mine work, the danger is that the mine attracts more undesirable businesses like the mine in the way of the old saying that "the rotten apple spoils the barrel." That is what happened in the Bay Area to Richmond from Chevron and to Benicia from Valero. We do not want to become known here as a place where exploitive businesses can come to add environmental burdens, problems, and risks, because our government has shown tolerance for such abuses of our local residents. That threat of attracting more such unwanted businesses will be another motivating reason for us voters to hold mine supporters accountable in the future elections. See # 3.N.

C. "Cumulative Impacts" DEIR # 5.3

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There are many cumulative impacts addressed in this Objection (and other objections to which I defer and incorporate, like the CEA Foundation and Friends of Banner Mountain, as discussed in my #1) that the disputed DEIR has understated, ignored, or otherwise stated incorrectly or in an misleading manner, contrary to CEQA Guidelines # 15130 and other applicable law, as illustrated in almost every section of this Objection and addressed with some legal technicalities in my # 14 and my supplemental brief. There are many kinds of impacts, such as, for example, the kind of competition that I demonstrate over groundwater and NID water as climate change, drought, and drier weather (generally ignored by the DEIR) force those of us living above or around the mine or otherwise drawing from the same underground water sources into drilling our own wells for our own shares of our groundwater. See, eg, my

#'s 3.N and 4. Note that we surface residents resisting the mine are trying to save our trees and surface vegetation (and reduce the fire risks and smoke harms of a drought dead forest), which are water uses for the common good of our community. In contrast, the mine dewatering waste of our groundwater would remove it from our community to somewhere else downriver with little or no realistic chance of adequate recharge or balance. See my #'s 3.A, B, D, E, F, M, and 5. Similarly, such fire smoke pollution caused by the mine, added to the mine's own DEIR understated air pollution, has the effect of exhausting the cumulative margin limits for what can be tolerated, thus creating competition between historical residential uses (eg, burning fire risk dangerous vegetation, and wood fire heating of homes) versus the undesirable mine uses which should be avoided all together from this no net benefit mining. See, eg, my #'s 3.J and N, 4, 10, and 11.

Moreover, as discussed above and in my #'s 3.N, 4, and 8, these undesirable mine uses may prevent future approval of desirable businesses and residences, because the mine abuses (usually worse than revealed in the disputed DEIR as explained in this Objection) exhaust the capacity of our community to tolerate any more environmental burdens. **Stated another way, the mine prevents our community from improving with quality growth by this exploitive mining use that adds no net benefit and exhausts our environmental tolerance capacities. See, eg, my #'s 3.N, 4, and 8. Note that the disputed DEIR at 5-3 admits that the "incremental" mining impositions can create "cumulatively considerable, and, thus, significant [impacts] when viewed together with environmental changes anticipated from past, present, and probable future projects."**

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Since (as the DEIR admits at 5-3) CEQA requires the lead agency to "define the relevant geographic area of inquiry, I remind you that the DEIR generally misstates that area to be just the small Brunswick site and/or the Centennial site, plus 30 wells along East Bennett Road. See my #'s 3.A. B, E, 4, 8, and 14. That flaw is especially true as to water and land use issues that are incorrectly analyzed in the DEIR's purported and disputed "Project List" at 5-4 -8 and Tables 5-1 and 5-2. The key area (ignored by the DEIR) is never any less than the surface above and around the 2585-acre underground mine and is often the whole surrounding broader "impact zone" (where, for example, us surface residents and voters compete with the mine for shared groundwater) and "stigma zone" (eg, where our real estate values are to be depressed by the mining burdens, risks, and problems) or our whole community. See my #'s 4, 8 and 14. See also my # 4, discussing why that local area impact must be given special weight by government decision-makers over the views of others in the county at a safe distance beyond the mine impacts. If the locals suffer disproportionately for the imagined benefit of others at such distance, this will trigger the kinds of disputes and divisive conflicts our county should avoid, because, as with the State Supreme Court's analysis in the public sewer plant and other cases in my #4, us disproportionately affected locals have special rights. Here that is even more true, because this mine has no net benefit to anyone besides the foreign investors receiving its profits, and we have potential legal and political disputes between the owner of an underground mine with the competing owners of the surface 200 feet above and around the mine and others in the impact or stigma zones. See, eg, my #'s 2, 3.N, 4, and 8. Please note that these residents and voters (like me) are here already contributing to the community with minimum adverse effects on the environment. However, if the disputed DEIR and mine were approved, we would be in perpetual conflict and competition

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against this 24/7/365 mining for 80 years that, in many ways ignored, underestimated, or otherwise unsatisfactorily addressed threatens us locals' property values and uses, our safety and environments, and our quality of life for a project of no net benefit to our community (see my #3.N, 4, and 14). Since there is no way to reconcile us locals to suffering such harms, risks, and burdens, the government decisionmakers need to consider all the cumulative legal and political consequences of approving this deficient and unsatisfactory DEIR and its undesirable mine. See my # 3.N, 4, and 14.

D. "Energy Conservation" # 5.4

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The DEIR comments basically incorporate other DEIR sections, and I, therefore, do the same where I have disputed and objected to those other referenced DEIR commentaries.

E. "Significant Irreversible Environmental Changes" at # 5.5

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While the DEIR admits causing some of these "irreversible environmental changes" at 5-8, although not in a satisfactory manner or to a realistic extent, the DEIR ignores many that are required to be disclosed and addressed pursuant to CEQA Guidelines 15126.2(c). Anything that threatens to endure 24/7/365 for 80 years in our suburban (not rural) community should be treated as the equivalent of irreversible, especially since once started the mine will have its own continuing adverse consequences after the shutdown. Moreover, since the DEIR stops future predictions and assessments in 15 or 20 years of an 80 plus year project (typically at 2040), there is no legal or other basis for the disputed DEIR or its advocates to contest that its harms are not "irreversible." To try and operate a mine like this is utterly incompatible with our existing and desirable suburban uses. For example, the hexavalent chromium shoring up the underground mine (eg, my #'s 3.C, G, and H and 7) will remain a perpetual threat, our depleted groundwater may never fully recover (ie, recharge and balance as incorrectly imagined in the DEIR) in the "new normal" climate change droughts and dryness (eg, my #'s), and our dried out, surface loss of forest cover (especially with fire risks) from mine dewatering (eg, my #'s 3.A, B, D, E, F, L, and M, and 5).

As admitted by the DEIR at 5-6 to be a consideration for such 15126.2(c) change, this "project would involve a large commitment of nonrenewable resources," such a underground water needed by surface owners and users above and around the 2585-acre mine that will be depleted without any satisfactory reason to expect it to be replenished (ie, recharged) in the climate changed "new normal" future of drought and dryness addressed in my #_____, especially as us more and more of us surface users compete for our own underground water by drilling more wells to our own groundwater as NID cuts back, either because it is short of supply or because government reallocates NID supplies elsewhere to more desperate places. See my # 3.N. Killing our already drought stressed local forests with such water depletion is another change that makes our local climate problems worse. As noted, as local victims realize their fate and their own legal rights, many other legal consequences will flow with adverse consequences both admitted (although understated by the DEIR), as well as those ignored or not satisfactorily addressed in the disputed DEIR. See, eg, my #'s 3.N, 4, and 14.

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As admitted by the DEIR at 5-6 to be a consideration for such 15126.2(c) change, this "project would generally commit the future generations to similar uses." The problem here is that, if we locals stop the mine after it starts, whether by our competition (eg, my # 3.N, such as drilling our own wells to our own groundwater being wasted by the mine), by exercise of our legal and political rights (my #3.N), or otherwise, the DEIR advocates and miner will try to argue that the mine cannot be stopped without more adverse consequences, like those it already argues in disputed DEIR at # at 4.3-103-04 as "Non-CEQA Related Analysis" issues. The time to have that debate about the early DEIR mine shut down consequences is now before mining starts, because us locals regard the continued mining operations as worse than any shutdown consequences. In any case, the time for the miner to reveal its position is now in this DEIR. That way the miner will either be forced to admit now before starting the more serious and previously unexplained consequences of mine shut down to the community, or else the DEIR advocates will have legal difficulties trying to raise those undisclosed issues later, when the mine stops or is shut. Depending on what is revealed in that "now or never" demand for disclosure by the DEIR miner, government decisionmakers hopefully can avoid a difficult future choice among competing burdens, harms, and risks by stopping the mine process now.

As admitted by the disputed DEIR at 5-6 to be a consideration for such 15126.2(c) change, this "project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project." Those "accidents" are assumed here to include this miner mistaking the harmful consequences of its conduct unless such responsible people wish to accept the consequences of their admitting to intentionally and knowingly causing harm. For example, the utility officers alleged to be responsible for the water pollution of hexavalent chromium that killed the town of Hinkley, California, as illustrated in the *Erin Brockovich* movie, claimed excuses and mistakes. That is also an example that is applicable here. Similarly, ignoring the realities of climate change and depleting our groundwater with such harm to our surface environment and uses is also such an accident. There will be many "I told you so" situations to come, if this mine and the disputed DEIR are approved, and unless the advocates are willing now to accept the consequences of causing knowing and intentional harms, they should now address those possible "accidents," where they are proven wrong about the risks, issues, and problems they have ignored in the DEIR and otherwise in response to this and other objections.

As admitted by the DEIR at 5-6 to be a consideration for such 15126.2(c) change, the "phasing of the proposed consumption of resources is not justified (eg, the project involves a wasteful use of electricity.)" Among the many resources that are wasted by this no net benefit and undesirable mine are both NID and ground water and clean air margins for tolerance (eg, competing mine air pollution versus the local burning of wood stoves for heat and vegetation for fire suppression). See, eg, my # 4. Remember that as to dewatering the mine, for example as discussed in my #'s 3.D, E, F, and M and 5 water waste discussions, the disputed DEIR contemplates massive depletion of our local water to move it somewhere else downriver, on the disputed and incorrect assumption (based on irrelevant and nonpredictive history about average rain between 1967 and 2017) that the local underground supply will recharge somehow, despite ignoring the "new normal" of climate change, drought and dryness and the consequent competition from those of us locals who will begin drilling wells for our own groundwater rights to save our surface forest and vegetation and to reduce our local fire risk

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(remembering that our exclusive "surface" right above the 2585-acre underground mine is admitted in Rise's 10K to be 200 feet deep, and our groundwater rights continue below that for those above the mine and exist without limitation for those of us living around the mine.)

F. "Significant And Unavoidable Impacts" at DEIR # 5.6

In that section the disputed DEIR admits that it has summarized "significant and unavoidable impacts of the proposed project." While those listed are understated or unsatisfactorily stated and, in some cases, could be partly mitigated, there are many others that are ignored, deficiently addressed, or debatable. More importantly, as admitted by the data in Rise's current SEC 10K and 10Q filings and addressed in my # 2, Rise does not presently have the financial capacity to even open the mine, much accomplish safety actions assumed in the DEIR or to do such mitigations as it proposes. Also, as noted above, many problems are worsened by insistence on 24/7/365 operations for 80-years solely because of Rise's arbitrary and undisclosed profit goals and revealed financial stresses, which are not satisfactory reasons for refusing to mitigate all these environmental burdens, risks, and harms. See my #'s 2, 4, and 14, addressing the Rise financial issues (eg, see Rise's 10K, including the high interest rate escalating to 25% on the $1,000,000 loan secured by the mine and the lack of adequate working capital and cash for the project work and mitigation contemplated in the DEIR inspiring their accountant to issue a "going concern" warning qualification to those financial statements.)

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Besides the problem identified in DEIR #4.1-2 **and 4.1-4,** degrading the visuals is also likely from the depletion of our local groundwater for wasteful dewatering that will not recharge in the "new normal" of climate change chronic drought and dryness as our local water is disposed of downriver somewhere else. See my #'s 3.A, B, D, E, F, and M and 5. We now live in a beautiful forest. When the already drought stressed trees and other plants die or suffer from the lower water table, nothing will be the same, especially if and when all those dry trees burn in a coming wildfire. When *Sunset Magazine* named Nevada City as one of the best places to retire in 2015 (as I recall), no one contemplated such mining in a suburban area above a 2585-acres underground mine under such circumstances.

Besides the problem identified in DEIR #4.10-1, the noise levels will be higher merely from the extraordinary 24/7/365 operations for 80 years, with all the rock crushing, machinery work, constant big truck loading and transport for 50 to 100 trips a day, and other things this DEIR mentions happening without adequate assurances of noise abatement. This will likely end up being monitored by locals and tested by locals under nuisance laws, as well as becoming a local political issue to create a suitable noise ordinance. Also, this DEIR discussion ignores the consequent noise caused by defensive work above and around the 2585 acre mine, such as everyone drilling wells for their groundwater to protect their surface trees and other plants from harm from mine dewatering depletion, from repairs to local infrastructure harms by differential settlement of the surface improvements by ground water depletion, and other defensive reactions.

Besides the problems admitted in disputed DEIR 4.12-1, 4.12-8, and 4.11-10, traffic is compounded and made worse for the same reasons stated above from unnecessary 24/7/365 operations for 80-years. If financial distress or lust for higher profits were excuses for 24/7/365 operations, many desirable local businesses would be demanding that right. Why favor such an

exploitive and undesirable mine with no net benefits with such extraordinary leniency on hours of operation that create burdens, risks, and harms to the thousands of local residents and voters living on the surface above and around the 2585-acre underground mine? Who wants 50 to 100 big trucks coming and going 24/7/365 for 80 years on our key roads not made for that?

One unaddressed example for partial mitigation is to reduce the 24/7/365 operations for 80 years. (By considering and rejecting a 12-hour day, the DEIR admitted that would make the mine economically infeasible. If that exhausts their feasibility margin, then the mine was never feasible at all, especially for someone in the weak financial condition revealed in the Rise 10K and 10Q.) Since our governments do not allow even most desirable business to operate on that basis, it is incomprehensible to us locals subject to these mining burdens, harms, and risks that government would allow such an extraordinary exception to an undesirable mine with no net benefit (see my #'s 3.N, 4, and 8), when that intensity makes many of our local burdens, risks, and problems admitted in the DEIR or in this or other objections much worse. Another partial mitigation would be to drop the plan to shore up the underground mine with toxic hexavalent chromium cement paste that made Hinkley, CA into a ghost town with oversized graveyards and casualties and into a reality horror movie called *Erin Brockovich*. Other examples abound in this Objection and others.

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13. Alternatives Analysis at DEIR # 6

I defer to others as to this debate because there is no acceptable alternative to rejecting the DEIR and keeping this mine closed, preserving the status quo since 1956. However, the less mine operation burdens, risks, and harms like those I have identified, the better. The disputed DEIR analysis in its #6 of alternatives, in its summary (at 6-3 to 7) of what purports to have a less than significant or no impact with or without mitigation is disputed and demonstrated to be wrong by this and other objections. What the disputed DEIR admits being "significant and unavoidable" at 6-7 is also disputed as insufficient and wrong, especially as to any mitigation. The whole idea of operating such an undesirable goal mine in the middle of our **suburban** community (ie, the area above and around the 2585-acre underground mine, if not the Rise owned sites) is absurd on its face, even if that were done by an operator who had the financial capacity to preform, mitigate, and comply with its legal obligations and DEIR mitigation and safety goals. I have seen no proof of such financial capacity by Rise, and its financial credibility is subject to question considering its admissions in Rise's current SEC form 10K and 10 Q filings, as I explain in my # 2. Our community has better uses for our resources. The last thing we need, as our community confronts climate change, political conflicts, and other serious problems, is this kind of protracted legal and political disputes and competition for local resources that are inevitable over such an undesirable, no net benefit mine with the potential to cause us locals to suffer chronic burdens, harms, and risks. See my # 4.

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The disputed DEIR dodges many questions about its requested 24/7/365 mining operations for 80-years, often by citing its disputed argument that under CEQA that "an EIR is not required to analyze alternatives when the effect of the alternative 'cannot be reasonably ascertained and whose implementation is remote and speculative.'" First, that exception does not apply to the climate change unprecedented dryness and drought addressed in my Objection

and others. Note that by the disputed DEIR resisting discussion of foreseeable burdens, risks, and harms at all or beyond the first 20 of its proposed 80 years of operations (typically, with 2040 cutoffs), the disputed DEIR admits that it regards those last 60 years as unknowable and speculative. How can government responsibly approve such mine operations 24/7/365 for 80 years where there are so many serious burdens, risks, and harms admitted in the DEIR and asserted by this and other objections? How so, especially when all the current science (and all our human experience in recent years) proves that climate change will make this area increasingly subject to continually worsening dryness and drought that make the DEIR predictions of the future from its calculation of average rain fall between 1967 and 2017 into an offensive joke? See my #'s 3.A, B, D, E, F, and M, and 5.

Second, even as to the first 20 years of mining the disputed DEIR purports to consider, the DEIR's disputed analysis contains errors, omissions, and other misleading data that grossly understate the mine's burdens, risks, and harms. That reality of the disputed DEIR failures and worse for the first 20 years (or 2040) should it harder for any responsible government to blindly give the mine a blank check for whatever happens in the next 60 years plus. No permits should be allowed beyond the willingness or ability of the miner to describe all the CEQA issues correctly and comprehensively for the entire period of mining. If this miner declines to provide any sufficient and correct data beyond 2040, then there needs to be another DEIR at that time before any extension.

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Third, those thousands of us who live on the surface above or around the 2585-acre underground mine (with Rise mineral rights only below 200 feet and not even then exclusive as to groundwater and some other things, as admitted in its 10K at my # 2) generally do not believe the disputed DEIR is an accurate and satisfactory description of our burdens, risks, and harms at issue. The DEIR ignores the fact that us thousands of objecting neighbors have our own competing legal and political rights to our groundwater, to subjacent and lateral support under our surface to prevent subsidence, to quiet enjoyment of our property, and other community and environmental benefits that we moved here to enjoy without the disruptions and worse threatened by this mine. See, eg, my #'s 3.F and 5. Indeed, even those in the adjacent stigma zone around those of us impacted neighbors will suffer loss of real estate value, environmental quality, and other benefits to which they have been accustomed. See my # 4. What that means is that those of us above or around this 2585-acre underground mine (including those in the larger stigma zone) have too much to lose by tolerating this DEIR mine. Therefore, besides enforcing our legal and political rights and defenses to persistently resist these DEIR threats, risks, and intrusions, we can also be expected to exercise our competing property rights. For example, as explained in my # 3.N and 4, our resistance likely will include saving our surface forest and plants from the mine's wasteful ground water depletion threat by exercising our competing rights to sink more wells to catch our groundwater before the mine dewatering process sends it away downriver somewhere else. That surface owners versus underground mine competition over our local groundwater will become more intense when our NID water is cut back by shortages or governmental reallocations. See, eg, my # 3.M and 8. That local competition is not "speculative," since that is already the consistent pattern throughout the State wherever there is insufficient surface water for traditional human and plant use. Since none of us locals can be expected willingly to suffer for the benefit of this no net benefit mine (see my # 4), government DEIR or mine approval will likely trigger both disputes and

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environmental resource competition with the mine that will endure and become more intense over the years, as us locals increasingly have more occasions to say, "we told you so."

As the disputed DEIR admits at 6-2 as a CEQA requirement at Guideline 15126.6(e)(2): "The specific alternative of 'no project' shall also be evaluated with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." This disputed and insufficient DEIR utterly fails to provide a fair comparison for those purposes, not only to what are errors and omissions in the disputed DEIR, but even as to what portion of reality it admits existing. Since from Rise's current 10K and 10Q financial reports (see my # 2 and those admitted "going concern" warnings from Rise's accountant and management and Rise's lack of any assurances of proven or other reserves of gold), it appears that Rise may not be capable of funding even what the disputed DEIR expects to accomplish as to safety, compliance, operating performance, and mitigation. Also, this DEIR must address what happens if it starts its operations and is unable to continue. In other words, one essential comparison is between the current no mining situation, and any alternative that cannot be accomplished by Rise for lack of sufficient money or otherwise. See my #'s 2, 13, and 14. Since the DEIR ignores most of the issues addressed in this and other objections, the increasing climate change, financial and political stresses, and other mine lender or investor risks will likely make fund raising more challenging for Rise. See my # 2.

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Thus, when the disputed DEIR insists that governmental DEIR and mine decisionmakers should ignore this and other objections as "speculative" or "remote," we counter that it's the miner's ability to perform and comply that is speculative and questionable, as is their ability to finance all that is required even by the insufficient DEIR for CEQA compliance or even feasibility. See my # 14 and my supplemental brief, where I offer to brief any legal questions as to why the DEIR fails to comply with CEQA or its Guidelines in scores of ways demonstrated in this Objection and others. The DEIR must be judged to be even more deficient and noncompliant, when it must be redone to consider all the corrections and altered economics that must occur to correct the disputed DEIR's errors, omissions, and deficiencies that I identify in this Objection and to deal with the harsher realities the disputed DEIR has ignored. **When the DEIR cites at 6-2 to CEQA Guidelines 15126.6(e)(2) as requiring in this "no project situation" choosing "an environmentally superior alternative among the other alternatives," it chose the wrong one (see my # 13) and must choose another one that is financially feasible without speculation. See my # 2, demonstrating why even from Rise's own financial 10K and 10Q filings any improvement in those questionable financial prospects would be speculative, as its own accountant admits with its "going concern qualification" and warning in those financial statements.**

Among the disputed DEIR deficiencies, errors, and omissions are many in the "Selection of Alternatives" discussion at 6-8 et seq. For example, all the DEIR mining alternatives should be eliminated by its own stated standards (at 6-8) from Guidelines 16126.6(c), since, among other things:

(i) There is a failure of the mine under any DEIR proposed approach **feasibly** to "meet most of the basic project objectives" (at 6-2) in compliance with applicable laws and regulations, as noted above and throughout this Objection and others.

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(ii) The DEIR mining alternatives are all as "infeasible" as the main proposal for all the reasons stated in this Objection and others, including on account of Rise's admittedly uncertain capacity to fund its operations as I explain in my # 2, addressing its current SEC 10K and 10 Q and other factors.

(iii) There is such an "inability to avoid significant environmental impacts" for all the reasons state in this Objection and others.

Note that such "infeasibility" in (ii) is admitted (at DEIR 6-8) to include among other factors: (A) "site suitability" (eg, the mine is no longer in the more rural area when it closed in 1956, but in a modern suburban area where thousands of residents and voters live on and around the 2585-acre underground mine within a forest that needs the groundwater at risk in this mining); (B) "economic viability" (eg, reopening this long closed mine even in accordance with the unrealistic, insufficient, and otherwise disputed DEIR, much less to deal with the realities the DEIR ignores or understates as shown in this Objection and others, will be very expensive [although the DEIR incorrectly ignores all cost and financing issues]. As shown in my # 2, analyzing, among other things, Rise's problematic SEC 10K and 10Q revealed financial condition and lack of gold reserve proof, Rise has demonstrated neither any sufficient working capital nor cash nor equity or debt financing, nor timely gold revenue prospects, to pay for accomplishing even the opening or operation of the mine, including (as shown in my # 2) the 10K's admissions there are no "proven reserves" or other assurances of any economically viable gold production from such operations, even at the lesser DEIR planning level, as distinguished from what more reality and legal compliance would require; (C) "availability of infrastructure" (eg, see the previous feasibility discussion, as well as my objections and others to using hexavalent chromium in cement paste to shore up the new underground mining); (D) "general plan consistency" (eg, see most of my Objection and others); (E) "other plans or regulatory limitations (eg, see most of my Objection and others); and (F) "jurisdictional boundaries" (eg, the disputes between the many owners and users of the surface 200 feet above the 2585-acre underground mine, as well as other adjacent owners whose surface and groundwater rights compete with the mine dewatering waste beneath them).

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Another example of DEIR failed logic and absurd reasoning is the disputed DEIR conclusion at 6-13 to dismiss all noncontroversial, industrial surface use alternatives, because they would be "more intensive" than this extraordinarily controversial, 24/7/365 mining for 80 years. Ask anyone of us objectors living above and around the 2585-acres underground mine if we can imagine any such commercial/industrial use being more objectionable than the DIR mine, and we would all vote for anything being better than this DEIR mine. Also ask our local real estate brokers, if any such commercial uses would harm our real estate values even one tenth of what this DEIR mine will cost us, and they would all agree that nothing could be as bad as this mine. Even if government decisionmakers rejected all the concerns in this and other objections from those in our community opposition (which would change no one's mind on the merits), this unsubstantiated and absurd contention about that normal commercial use would still be obviously wrong. Nevertheless, please note that when decisionmakers consider the merit of the objections about the 2585-acre underground mine and its "intense" dewatering and other conflicts with us surface owners and users, it should be obvious that the DEIR simply refuses to consider any other reasonable use of the surface area to its own selfish gold profit ambitions that are use least compatible with our suburban

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community than any mining. This may be why the DEIR so often ignores us thousands of surface owners above and around this 2585-acre underground mine, because it is easier (although still wrong) for the DEIR to pretend the mine is less "intense" if it ignores those most provocative burdens, risks, and harms.

The list of disputed DEIR operating variable alternatives (at 6-13 to 15) for individual activities likewise appear just to be excuses for insisting on the preferred DEIR plan that all of us objectors find for good cause shown to be intolerable. To illustrate that reality for disputing the DEIR's credibility, I note some examples detailed elsewhere in this Objection. THE MOST SERIOUS AND ABSURD OF THESE DISMISSED ALTERNATIVES REVEALS SOME IMPORTANT REASONS FOR DISPUTING AND REJECTING THE DEIR AND ITS PURPORTED REASONING. AT 6-13 THE DISPUTED DEIR DISMISSES OPERATING LIKE OTHER BUSINESSES FOR 12 HOURS INSTEAD OF 24 BECAUSE: "CAPITAL AND OPERATING COSTS WOULD INCREASE SUBSTANTIALLY AND LIKELY MAKE THE PROJECT ECONOMICALLY INFEASIBLE." THIS ADMITTED VULNERABILITY SHOULD CONFIRM THAT THE WHOLE ECONOMICALLY FRAGILE PROJECT IS NOW INFEASIBLE, AND NO LAW REQUIRES US NEIGHBORS TO TOLERATE 24/7/365 OPERATIONS TO ACCOMMODATE SUCH PROFIT GOALS OF A BUSINESS FOR ITS FOREIGN INVESTORS. IF NORMAL MINING OPERATIONS ARE NOT ECONOMICALLY INFEASIBLE, THAT IS GOOD CAUSE TO DENY THE MINING NOW, ESPECIALLY WITH A FINANCIALLY RISKY MINER LIKE RISE ADMITS BEING IN ITS SEC 10K AND 10Q AS DISCUSSED IN MY # 2. ALSO, IF THE MINE IS THIS VULNERABLE TO ECONOMIC STRESSES, THEN WHAT ABOUT THE OTHER ECONOMIC STRESSES NOT ADDRESSED IN THE DISPUTED DEIR, WHICH GENERALLY FAILS TO DISCUSS ANY ECONOMIC VARIABLES OR COSTS, ESPECIALLY THOSE ASSOCIATED WITH THE OBJECTIONS MADE (AND TO CONTINUE TO BE MADE) BY US SURFACE OWNERS AND USERS ABOVE AND AROUND THE 2585-ACRE UNDERGROUND MINE. For example, if we succeed in preventing 24/7/365 dewatering of the mine, as some may do directly or by competing with more wells for what is also our groundwater, that by itself by the DEIR's own admissions could obstruct that objectionable 24/7/365 ambition. Note that, even if the County were to allow such 24/7/365 operation, the legal and political disputes that would continue could involve many options that could prevent such continuous operations, as could direct law reform as discussed in my # 3.N. For example, when our groundwater objections continue to be processed by our political and legal systems, one consequence could likely be reduced dewatering, a potential the disputed DEIR fails to consider, because (like it ignored climate change and drought) the DEIR refused to address sufficiently groundwater burdens, risks, and harms posed by the mine as discussed in my #'s 3.A, B, D, E, F, and M and 5.

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ANOTHER STRANGE EXAMPLE OF FLAWED DEIR REASONING (AT 6-14) IS CUTTING BACK ON THE AMOUNT OF TRUCKING THAT IS NOT JUST A TRAFFIC PROBLEM FOR OUR COMPETING LOCAL DRIVERS, BUT ALSO THE POUNDING OF THOSE HEAVY TRUCKS FULL OF ROCK AND OTHER MINE LOADS WILL QUICKLY WEAR OUT OUR ROADS AND INFRASTRUCTURE THAT ARE NOT MADE FOR THAT KIND OF ABUSE. RECALL THAT SUCH HEAVY TRUCK RUNS ARE EXPECTED TO INCLUDE "AN AVERAGE OF 50 TRUCKS PER DAY" WITH A MAXIMUM OF A 100 TRUCKS PER DAY." THE WORST PART IS THAT, WHEN THOSE ROADS AND INFRASTRUCTURE MUST BE REPAIRED FROM THAT CONSTANT TRUCKING ABUSE, TRAFFIC ON THOSE KEY ROADS WILL BECOME ALMOST IMPOSSIBLE FOR EXTENDED PERIODS OF TIME WHILE THEY ARE BEING REPAIRED. THE DEIR FAILS TO ADDRESS SUCH CONCERNS ADEQUATELY. Incidentally the

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supposedly "more intense" traditional commercial/industrial uses would be far less intense that that mine trucking just by itself.

At the end of this flawed DEIR discussion of alternatives (at 6-42): the DEIR concludes: "Based on the preceding alternatives analysis, the No Project (No Build) Alternative would be the environmentally superior alternative." In that case the DEIR insists that "another alternative must be selected to be the environmentally superior alternative." BASED ON THE BOGUS DEIR DISMISSAL OF ACTUALLY SUPERIOR "INDUSTRIAL," NON-MINING USES DISCUSSED ABOVE, INSTEAD THE DISPUTED DEIR PROPOSES ALTERNATIVE 2 "ELIMINATION OF THE CENTENNIAL INDUSTRIAL SITE" AS REDUCING "THE GREATEST NUMBER OF PROJECT IMPACTS." BUT THAT CONCLUSION IS WRONG, BECAUSE THE DEIR IGNORES ALL THE BURDENS, RISKS, AND HARMS WITH THE 2585-ACRE UNDERGROUND MINING AND BRUNSWICK SITE OPERATIONS THAT ARE EVEN MORE SERIOUS AND WOULD CONTINUE WITHOUT REGARD TO THE CENTENNIAL OPERATIONS. IF THE GOVERNMENTAL DECISION MAKERS HOPE TO SOMEHOW ARRANGE A COMPROMISE WITH MINING OPPONENTS, THE DEIR IMPLIED OFFER TO SACRIFICE ITS CENTENNIAL AMBITIONS ACCOMPLISHES NOTHING FOR THE RESOLUTION OF LOCAL RESIDENT OPPOSITION. OUR MOST SERIOUS CONCERNS ABOUT BURDENS, RISKS, PROBLEMS, AND OUR DEPRESSED REAL ESTATE VALUES ALL PRIMARILY RELATE TO THAT UNDERGROUND MINING OF 2585 ACRES FROM THE BRUNSWICK SITE, AND THE "NO MINING ALTERNATIVE" IS THE ONLY WAY TO PREVENT PERPETUAL CONFLICT, COMPETITION, AND DISPUTES WITH US LOCALS USING OUR OWN COMPETING LEGAL AND POLITICAL RIGHTS THAT CANNOT BE ELIMINATED BY ANY MINING APPROVAL. See my #'s 3.M and 4.

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Since the manufacturing/business site Alternative avoids all this conflict, I urge the decisionmakers to disregard the meritless dismissal of that DEIR Alternative at DEIR # 6 by the mine advocates for no satisfactory reason. Too "intense" is absurd in comparison to the "intensity" of this DEIR mining. If any government official doubts that, consider the difference in the "intensity" of the local opposition to each alternative. (The DEIR preferred fallback Alternative idea of dropping the Centennial Industrial Site also won't work, because in reality it's not a separate CEQA "project," but an integrated part of the one mine project and cutting it out would mean a total rewrite of the whole DEIR to conform to that reality and comply with CEQA. See my #14 and my supplemental brief.)

14. Some Additional Legal Issues For Follow-Up Consideration By DEIR Decisionmakers In Addressing Disputes Between The Mine Versus Those Of Us Living Above And Around The 2585-Acre Underground Mine.

A. Some Reasons For the County As Lead CEQA Agency To Reconsider And Accept My Objections As Consistent with CEQA, Even As To The DEIR's Economic Infeasibility, And A Preview of Some Rebuttals To The DEIR's CEQA Interpretations To Come In A Supplemental Objection.

Ind 254-90

As explained in my # 1.D, at the public hearing on March 24, 2022, the County began by excluding all consideration of evidence and argument regarding the financial condition and character of the DEIR miner and the financial feasibility of accomplishing key safety and

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mitigation results assumed in the disputed DEIR, contrary to this and other objections. Since the County had not yet heard any arguments why that position in incorrect under these particular facts and circumstances, I ask the lead CEQA Agency reconsider for reasons stated in this section and in the more technical brief that I expect to prepare before the end of the comment deadline. That is especially important where the DEIR itself makes financial feasibility statements that this Objections rebuts with admissions by the DEIR or Rise in its SEC 10K and 10Q filings about this mine (which is its only significant asset). Perhaps the County's such ruling was influenced by thinking that objectors might have a more efficient forum for such excluded objections in connection with the County's coming so-called economic study. But I later learned that study also may be too narrow, focused on other things, and may also mistakenly exclude those considerations. Therefore, I urge the County to expand that economic study as well for these and even more of such objections by me and others.

I am aware of the kinds of **factually distinguishable** court decisions where such challenges failed **under different circumstances than these**, and I invite the County to consider my counter authorities in a supplemental legal argument filing soon in support of my position. Please note here, however, that even Rise's own favorite cases do not allow bad faith DEIR claims which are illusory or speculation or bogus assumptions. That is what appears to exist here, since my #2 proves that Rise currently cannot afford to perform the DEIR and mitigations, even as they proposed them, as distinct from what more will ultimately be required by government or courts or local law reforms if the mine proceeds. That fact, largely based on Rise's own SEC filing admissions, makes the DEIR "illusory" and suggests a lack of "good faith." That is especially true given all the DEIR's other "strategic" errors, omissions, and deficiencies exposed in this Objection without any good excuse, such as the DEIR occasionally mentioning the use of hexavalent chromium in the mine shoring cement paste without any mention of it or its dangers in the DEIR's "Hazards And Hazardous Materials." See also my # 3.E and M, where I illustrate other examples of obscuring data, insufficient data, strategic omissions, and other inappropriate tactics prohibited by CEQA cases like *Banning Ranch Conservancy v. City of Newport Beach* (2017), 2 Cal.5th 918, 940-41 ("**Banning**") and *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), 40 Cal.4th 412, 442 ("**Vineyards**"), each insisting on "a good faith reasoned analysis," rather than scattered or buried data, and unexplained data in exhibits.

In any event, under the applicable facts and circumstances in this case and a correct interpretation of CEQA and its Guidelines and relevant (as distinct from distinguishable or other lower court decisions to be correct by the California Supreme Court), I urge that everything in this Objection be considered. I will explain that position in more detail in a supplemental brief to be submitted before the deadline. (The DEIR contained their disputed legal interpretations of various CEQA requirements, and so it's only fair and appropriate for the CEQA lead agency to consider my counters.) In the meantime, I believe that the DEIR is irreconcilable with the following example California decisions (and relevant cases, statutes, and Guidelines) cited therein, among others to be explained in my supplemental brief. *E.g.*, Sierra Club v. County of Fresno (2018), 6 Cal.5th 502; Concerned Citizens of Costa Mesa, Inc v. 32nd Dist. Ag. Ass'n (1986), 42 Cal.3d 929; POET. LLC v State Air Resources Bd. (2013), 218 Cal.App. 4th 681; Gray v. County of Madera (2008), 167 Cal. App. 4th 1099.

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Please remember, even if the lead CEQA Agency were to disagree with me on the technical CEQA merits of such legal disputes, there is one additional reason no agency or court should ever resist full consideration of this and other objections: legal "impeachment" rebuttal (ie, the use of evidence to contradict false or misleading claims) and especially the use some of the DEIR's and Rise's own words to rebut others. What my Objection does, and other objections could do, is expose with such evidence DEIR's many internal contradictions to prevent the DEIR to prevail inappropriately by exposing contrary or inconsistent statements either (i) within the DEIR, or (ii) in the current Rise SEC Form 10K or 10Q (which, as I show in my #2) discusses many of the same mining related issues as the DEIR is different, inconsistent, or even contradictory ways. The California Supreme Court's most important lesson about CEQA is the need for both clarity and truth. Objectors like me are entitled to challenge a DEIR that "crosses those lines." Especially at times like this in our divided world's larger conflicts, where constant barrages of false news/propaganda seek to create "alternative realities" (eg, Russia's distortions and worse about Ukraine), it is important to remember that the rule of law itself depends on one clear and truthful reality. The DEIR often can be shown to fail that test, and it needs to be redone to clarify the actual reality of this mine. To do that requires corrections and edits to the DEIR consistent with this and similar objections.

Furthermore, the County should also allow appropriate consideration of accepted matters to which courts take "judicial notice" as matters of fundamental logic or reality, to prevent obviously false or misleading claims from being accepted by denying contrary such proof. For example, if Rise were to say, "Don't worry about any health or safety rules, because I'll just pay any victims to make them whole" (an exaggerated version of the disputed DEIR claim to cover anyone whose well dries up, which my #2 proves is equally illusory or speculative), that implies that Rise had the ability to accomplish that false claim. Why? Because people are not allowed to just invent nonrealities contrary easily proven facts in the real reality, especially by admission from the person asking a court or government official to join in that fantasy to officially (but incorrectly) pronounce it to become real. When the rule of law applies (and as CEQA must apply here), no naked "emperor" is allowed to insist that he's wearing a fancy suit, because we allow people to say the clear truth that "the emperor has no clothes." This is what my Objection and other objections seek to do about this DEIR. For example, the Rise admissions I cite in my #2 should be allowed to rebut that illusory DEIR assurance that somehow, without even knowing the huge number of affected old and new wells over even a shorter period than 80 years, the miner will supply the needed replacement water.

Please remember that the DEIR itself put its financial feasibility into issue for rebuttal by claiming (at DEIR page 6-14) that limiting mining to a 12-hour day made the project economically infeasible. Since DEIR uses that claim to defeat better "Alternatives" and mitigation, the law requires such rebuttals in my Objection and others. That admission by the DEIR itself at page 6-14, by manipulating the data on "Alternatives" thereby legally "opened the door" for all my economic feasibility arguments, and it illustrates the DEIR's inconsistency. When the DEIR wants to plead poverty like that it does, and when it wants to make implied or express promises of being able to afford whatever mitigation may become necessary (eg, providing water to all dry well owners). The DEIR cannot have it both ways without us being able to expose that nonreality one way or the other. See, eg, my #'s 2 and 13. Yet, when the

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DEIR discusses (eg, 4.8-66) replacing wells the dry up (besides the 30 along East Bennett Road), Rise's current financial condition and questionable future prospects discussed in my #2 prove (including by Rise admissions in its current SEC 10K and 10Q filings) that it does not have the financial capacity to accomplish such mitigation, especially as the climate change the DEIR ignores forces many of us to drill competing wells to reach our own groundwater as NID supplies are reduced. See, eg, my #'s 3.D, E, F, M, N, 4, 5, 8, and 13. Indeed, that is what the DEIR itself admits it cannot accomplish (at 6-14) if it's limited to a 12-hour workday, as objectors will still demand. A CEQA compliant DEIR would have to disclose such realities, and when (as here) the DEIR fails to do so objectors must be allowed to expose them.

Furthermore, **another DEIR "opening of the door" to my less CEQA-traditional rebuttals is the DEIR's "Non-CEQA Related Analysis" at 4.3-103-04, incorrectly purporting an attempt to show "good faith," but allowing us to prove the opposite if we are allowed to do so. My point on this also includes this related DEIR admission: that some of what the DEIR and apparently the County consider to be outside some disputed CEQA boundary is needed for essential clarity. This means one of two alternative admitted things, either the disputed DEIR CEQA boundary is wrong, or essential clarity of purpose and what they incorrectly consider "good faith" requires going beyond the CEQA constraints. Either way, if the DEIR can include what they call "Non-CEQA Related Analysis," then we objectors must be able to respond and counter in kind.**

Ind 254-90

This cannot be a one-sided process where the DEIR can make any nonfeasible, false, or misleading claims they wish and us, while objectors are not permitted to rebut and expose those claims. The reality is that in many cases the DEIR fails to comply with applicable law, because its purported safety and mitigation assumptions and so-called facts, goals, and contentions addressed in this Objection and others are not only incorrect, deficient, and otherwise noncompliant with CEQA, but also are illusory. The CEQA lead agency must allow us to prove those wrongs by accepting our substantial evidence to the contrary, including fatal admissions by the DEIR and the miner, including as to economically infeasibility. As I prove in my #2 above, Rise and its accountant admit that there are "going concern" financial issues that make its performance at best too speculative and at least as to some things admittedly infeasible. When the miner's account warns the investors to beware that the mining may to be feasible for lack of sufficient funds, how can any responsible government not at least test at least the more obvious DEIR illusions?

In any event, I make my offer of proof as to admissions, DEIR contradictions and inconsistencies, and other evidence (and their applications) in my #2 and other places in this Objection for the record in requesting such reconsideration to require consideration of my economic feasibility and other rebuttals and counters. More important, as in my #2 and elsewhere I urge the County to ask if Rise is the real party in interest here, or whether they are acting for the real party with the money "behind the curtain." If, for example, Rise were "fronting" for someone else or planning to "flip the deal," that would also create CEQA objections to this DEIR. Since Rise lacks the funding to accomplish this disputed DEIR plan (see my #2), it is reasonable to ask why or for whom they are investing in this DEIR effort.

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B. Supplement To Brief Rebuttals To DEIR Or Miner Incorrect Interpretations of CEQA Or Other Applicable Laws And Open Offer For Further Briefing.

Ind 254-91

This Objection contends that the DEIR does not comply with CEQA and for various reasons should not be approved or at least entirely rewritten. To justify errors, omissions, and deficiencies in the DEIR, its proponents attempt to rely, for example, on disputed interpretations of CEQA or its Guidelines, sometimes stated and sometimes implied, and these disputes go beyond the economic feasibility debate discussed in the previous subsection, where some CEQA related issues are argued back against the DEIR's disputed contentions. While my Objections and others demonstrate facts, including by DEIR or Rise admissions, that make those DEIR or Rise legal arguments inapplicable or worse, I also offer to brief any legal issues as to which the government decisionmakers have any doubts. However, rather than add that legal briefing to support the scores of broader disputes with the many errors, omissions, and deficiencies in the DEIR, I will simply make an offer of proof to invite whatever briefing you decisionmakers would consider helpful on the remaining issues. To illustrate how that might work, I have offered a few examples below of such possible disputes.

C. Some Other CEQA Noncompliance By The Disputed DEIR, Including As Merely One Example, the Massive Underestimation of Dry Wells And the Illusory And Impractical DEIR Mitigation To Which Even NID Objects.

Ind 254-92

The most substantial and frequent flaw in the DEIR, the consistent making of infeasible and not credible assertions of purported facts, data, or plans, even those beyond the economic infeasibility issues discussed above, seem premised on the disputed legal theory that this DEIR can comply with CEQA and its Guidelines merely by making objectively disputable or unsubstantiated statements that are false, misleading, or otherwise illusory about what will or could be accomplished pursuant to the disputed DEIR. For example, as demonstrated above the DEIR purports to address mitigation of our common protests against dewatering the mine drying up more existing **and future** wells besides the 30 along East Bennett Road. Beyond the economic infeasibility of that illusory DEIR mitigation addressed above, there is also the practical CEQA noncompliance by the DEIR as to the lack of adequacy of such mitigation, even if it could afford to do what would be necessary. As the NID speakers and others explained at the March 24, 2022, hearing (in the insufficient 3 or 5 minutes allowed each objector to identify massive DEIR disputes), a dry well water truck or hugely expensive NID connection is not feasible mitigation. As one realtor speaker explained (and other such experts will complain throughout this process), that DEIR mitigation is going to make the affected property not just depressed in value (as the whole community suffer from mine stigma and other impacts), but unmarketable or, in the case of land, unbuildable. Nowhere does the DEIR address that reality or the impact on the mine and the miner when the consequences of that mine dewatering is litigated. (Remember, as stated earlier, us surface property owners have legal property rights that include groundwater, and any harm to those rights has legal consequences for the miner,



but also for any government allowing a "taking" or "inverse condemnation" of that surface property right.

When what is assumed or represented by the DEIR is illusory, false, or deficient for any reason, not only because most required things in the DEIR are not currently feasible or affordable by Rise, there is a CEQA problem. The DEIR cannot insist that us local victims (or our government who is supposed to protect us) must accept or suffer such an "alternative reality" or illusion. Whatever the reason, there is a valid CEQA or other legal challenge whenever the underlying disputed DEIR assumptions, speculations, or unsubstantiated or preposterous claims or "wishful thinking" are challenged by us objectors. The disputed DEIR saying something does not make it so, and whatever the DEIR says must be subject to challenge and rebuttal by any legally competent evidence, which includes DEIR admissions, contradictions, inconsistencies, illusions, and worse, as well as those of Rise. This Objection has quoted both specific and general errors, omissions, and deficiencies, often by using quotes of the DEIR or Rise documents to prove my rebuttal cases on the merits. There is such a serious and consistent pattern of such documented DEIR errors, omissions, and deficiencies that it is reasonable for government decisionmakers to be at least skeptical and to insist on more and better data. The California Evidence Code allows that kind of evidence, including of any objectionable "pattern or practice" by the party being challenged. That kind of rebuttal is essential here, because I believe that, for all the reasons stated in this Objection and the others stated at the March 24, 2022, hearing or duly filed, the DEIR has demonstrated that it has and deserves little credibility with most of the informed residents and voters living above and around the 2585-acre underground mine who can be expected to resist the mine with all appropriate legal and political tools we can muster.

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Although it is sufficiently addressed throughout this and other Objections that I will not repeat it here, another feasibility obstacle from us local mine opponents living above and around the 2585-acre mine is that we also have competing property legal rights, for example, to the same groundwater that the DEIR expects to waste in dewatering and dispose of somewhere downriver in the Wolf Creek. Our competition for our own groundwater by more wells in this worsening climate change dryness and drought, which the DEIR entirely ignores in favor of irrelevant and nonpredictive average rainfall assumptions from 1967 to 2017, may defeat the DEIR plan by itself. See, eg, my # 3.D, E, F, and M and 5. Finally, us local voters expect to accomplish some law reforms (see my # 3.N, 4, and 8) that will also prevent the accomplishment of the DEIR plan, such as, for example, by limiting mining operations in such suburban areas to 12 hours a day, which the DEIR admitted (at DEIR 6-14) would be fatal to its mining plan.

D. Examples Of The Disputed DEIR's Failure To Address the Predictable Future Contradictions To DEIR's Incorrect, False, Or Misleading Alleged "Facts," Opinions, And Assumptions On Which The DEIR Plans Purport To Be Justified.

Ind 254-93

This Objection makes a special point of exposing the objectionable way that the DEIR consistently and incorrectly assumes that it can predict the future results and consequences of its DEIR 2585-acre underground mining project from its selected data from the past. This is not

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just about ignoring climate change problems, such as dryness and drought, as discussed above. This is also about the fact that the disputed DEIR incorrectly assumes that it sufficiently knows the starting condition of this underground mine that's been closed and flooded since 1956 without adequate updated evaluations. Even more disturbing, the DEIR incorrectly assumes that what insufficient and questionable data the DEIR uses about that existing mine will continue to apply to what happens because of the DEIR's new, expanded, and deeper mining into unexplored places in those 2585-acres. See, eg, my # 3.M. Also, as illustrated by the disputed DEIR plan to use toxic, hexavalent chromium in the cement paste to shore up the new mining tunnels etc, the DEIR assumes that relevant environmental regulations will remain as lax in the future as they are now. If our applicable laws and regulations become more consistent with the science that assure successful civil litigation for victims (eg, the Hinkley, CA example from *Erin Brockovich*, or the US following the EU ban on such Cr+6 on account of the mass of horror stories on the EPA website), what happens to the DEIR mining assumptions? The answer is that no one knows from the DEIR, because the DEIR ignored the entire controversy, which (as explained in my #'s 3.C, G, and H, and 7) is like a developer installing asbestos in a new building without explanation, even though the whole asbestos industry was suffering mass tort judgments that had already driven many into bankruptcy, simply because that industry (like the cigarette industry) stalled effective regulation despite the clear science confirming the danger.

E. Miscellaneous Other Legal Considerations For Defeating The DEIR.

Ind 254-94

These serious DEIR errors, omissions, and deficiencies, like others addressed throughout this Objection, may be premised on the disputed citation of the DEIR (at 4.7-32) to California Building Industry Association v. Bay Area Quality Management District (2015), 62 Cal. 4th 369, for the idea that as a successor owner of a mine closed in 1956, Rise can duck liabilities it inherited. (The mining industry also often uses mining leases to operators to attempt to shield the landlord taking a share of the profits from the tenant miner who too often is not financially capable of paying its victims.) However, that case notes (at 377-78) that "when a proposed project risks exacerbating those environmental hazards conditions that already exist, an agency must analyze the potential impact of such hazards on future users. [That] ... compels an evaluation of how the future residents or users could be affected by exacerbated conditions." Here there are many substantial and sometimes total failures of the disputed DEIR to do that, both as to the groundwater depletion and related issues addressed in my #'s 3.D, E, F, and M and 5 (compounded by using hexavalent chromium in that new, expanded, and deeper mining and the climate change drought and other impacts. See my #'s #.C, G, and H.)

My supplemental CEQA brief will address various issues in more detail, so that we can eliminate any purported DEIR excuses for not addressing the full reality of this mining menace. Nevertheless, there are sufficient court cases that I have discussed in this Objection to defeat the disputed DEIR on its merits and for noncompliance with a correct interpretation with CEQA or its Guidelines. The decisionmakers should find my authorities more useful in that factual context than anything to the contrary cited in the DEIR, where the real facts and circumstances are not what is stated in the DEIR, but instead what is stated in this Objection.

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15. Some Example Concluding Questions For DEIR Decisionmakers To Ask As Follow-Ups To This And Other Objections.

A. How To Achieve Clarity About This Disputed DEIR That Has The Effect of Obscuring Important Truths: Some Reasons For Considering Example Questions Like These, As A Means Of Organizing The Mass Of Useful Objections By Many Impacted Locals On Their Respective Unique Concerns About The Many DEIR Errors, Omissions, And Deficiencies

Ind 254-95

As I sat listening at the March 24, 2022, County hearing to the more than 100 local people objecting to this disputed DEIR threatening many of the things they love most about their homes, their environment, and their community, I wondered how one could organize that overwhelming mass of truths from so many different perspectives. I then multiplied what those 100 plus of objectors had to say by more they would have said if they had more than three minutes, as well as what many or their mine opposition organizations will say in written objections, and I became concerned. How could we reveal all the simple truths in a more coherent way under these circumstances in rebutting a DEIR with so many flawed narratives to address that, whether or not so intended, have the effect of making a unified and coherent rebuttal more than challenging? I know that difficulty because in my effort in this Objection I found it hard to achieve what in science might be called a "unified field theory" to explain why this DEIR is so dangerous and objectionable. I wish I had the time to develop such a more comprehensive and unified way than by what I have been able to do here in drilling down on my top 50 or so serious complaints on the topics and issues I have some qualifications to address. Perhaps some objector smarter than I can do so to merge all this objection data together into the view of reality we need our government to have against this DEIR. In the meantime, here is my suggestion for such a compilation that I illustrate in two ways: first, we ask the **hard questions** that the DEIR dodges and evades and that under CEQA and the demands of logic and fairness this "alternative reality" DEIR should be required to address, and second, we expose (and file our challenges to) the disputed excuses that DEIR seems to be using to hide from those hard questions.

What follows are some examples of such hard questions dodged or evaded in the disputed DEIR to illustrate my concept. What follows separately in a supplemental brief on some CEQA issues will be an illustration of how DEIR's evasion and omission techniques do not comply with CEQA, as the DEIR expressly and implicitly claims incorrectly that it has done. For example, the DEIR attempts to avoid entirely contrary realities for which it has not even one of its deficient, but positive or reassuring sounding (though erroneous) answers. **For example, somehow the deficient DEIR incorrectly imagines that CEQA can be satisfied by a theoretical discussion of what some feasible mining plan might be by someone theoretically capable of achieving what the disputed DEIR claims in its "alternative reality."** Wrong, as I will try to demonstrate in my supplementary filing and here illustrate in my #'s 2, 4, and 14, it is sheer speculation that this DEIR miner could afford actually to accomplish what is stated so confidently in the disputed DEIR. **CEQA is not just about useless, abstract miner theory. The law requires clarity about what the actual miner will actually do, what burdens, harms, risks,**

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and issues will actually be encountered, and how the actual miner will actually mitigate those problems and accomplish the real project as detailed in a DEIR that enables everyone who could be impacted to be able to make informed decisions. What responsible government must know the COMPREHENSIVE REALITIES before it allows this kind of underfunded miner (see my # 2) to reopen a mine closed and flooded since 1956 to begin new, expanded, and deeper mining into unknown conditions in that 2585-acre underground mine below thousands of objecting surface residents 24/7/365 for 80-years. What this and other objections are doing in our various ways is to convince our government that the disputed and deficient DEIR does not ever adequately inform any of us about what is actually going to happen and not happen underneath our homes and property and to our environment.

B. Examples Of Some General Opening Questions About The DEIR And Miner, Reflecting What Locals Distrust As Errors, Omissions, Or Deficiencies.

(1) Fact Base of Questions Regarding Local Resistance (see my # 3.N): Most of the informed people among the thousands living above or around the 2585-acre underground mine beneath our homes and properties appear (like me) to have specific fears and concerns about the mine and disputed DEIR. Such locals like me find no sufficient and reliable answers in the DEIR to their predictable questions and concerns. Instead, we are discovering or learning about many errors, omissions, and deficiencies in the DEIR, especially about the potential risks, threats, and problems that would be occurring beneath us 24/7/365 for 80 years, if the DEIR and mine were approved, especially (i) regarding groundwater and NID water depletion or waste in what we expect to be prolonged dryness and drought from climate change generally ignored by the DEIR, (ii) regarding the use of hexavalent chromium cement paste to shore up the underground mine and perhaps ending up in wells or the Wolf Creek, and (iii) regarding the way the DEIR seems to pretend that the only considerations that matter are the small parts of the mining situation and plan (eg, the owned surface sites and 30 dry wells along East Bennett Road) that almost entirely ignore our local interests and concerns living above and around the underground mine. In other words, there is no apparent net benefit from this mine to us locals, but many obvious risks, harms, and problems for which no solution or insufficient mitigation is proposed or revealed in the DEIR. See my #2.

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Related Questions:

Why has the DEIR not even attempted to recognize, much less address, any of us locals' concerns? Why must this be an "apples versus orange" debate, in which the apple is real and the DEIR orange is alternate reality?

Why has the DEIR not addressed the scientific evidence of climate change affecting our shared NID water and groundwater supplies? How can the DEIR justify only looking at the past to predict the mine future, when the future realities will be different not only because of climate change, but also because of what the DEIR mining is changing 24/7/365 for 80 years in its mining, including into new, deeper, and expanded parts of the

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2585-acre mine with unknown and unexamined condition underneath thousands of surface residents?

Why does the DEIR not identify and notify the surface owners' and users' above and around the 2585-acre mine and otherwise recognize their legal rights in competition with the underground mine?

Why has the DEIR mine done nothing to address the stigma consequences of its DEIR mining plan on thousands of people living on the surface above and around the 2585-acre mine, such as the loss of value in their homes? By submitting such a disputed DEIR full of such errors, omissions, and deficiencies what can a home seller say to a buyer about the mining occurring literally beneath the house? Because, unlike the disputed DEIR which would say "don't worry, my CEQA report says everything the law requires me to tell you is fine," wouldn't the home sellers' truths have to be that until someone stops it: (i) there could be 24/7/365 blasting, tunneling, rock removal, shoring with toxic hexavalent chromium, dewatering and other mining activities in a 2585-acre mine beneath your new property, (ii) the DEIR says not to worry, and the government for some reason approved it, by I and everyone else around here objected and are resisting, and (iii) there are hundreds of detailed objections by us locals and other experts denouncing that DEIR and its government approval because we consider the DEIR to be full of error, omissions, and deficiencies and the miner by its own admission unable to afford to accomplish even what the DEIR states, much less what such objections insist would have to be done for the mine to be tolerable, if that were even possible when adequate reliable information is available correcting the DEIR's deficiencies?

Ind 254-96

How can Rise fund even what is proposed in the insufficient DEIR, considering what it has admitted in its SEC 10K and 10Q (see my #2)? What is the track record of Rise and its officers, directors, and major shareholders in safe mining consistent with environmental laws and regulations? What it their litigation and governmental investigation or enforcement history, since sometimes settlements of serious allegations are relevant in judging suitability and credibility for such DEIR mining? (That and more is relevant to any investor or lender making a credit judgment about such a miner seeking funding, and, therefore, that information must be relevant to any consideration of the feasibility of any DEIR mining plan.)

Considering the many concerns about the performance and compliance capabilities of this DEIR miner and plan, will the DEIR advocates accept DEIR and other approvals as conditional on timely performance standards and compliance? Stated another way, will DEIR advocates accept more meaningful consequences for noncompliance and wrongs than a mere breach of contract remedy, which almost always produces disappointing results in bankruptcy, especially in the context of a cross-border bankruptcy, or in other abandonment of the types common in the mining industry whenever things go badly or the mine has played out? (See, eg, my # 2 and the EPA website listing more than 40,000 abandoned mines in California, many once in bankruptcy before the trustee or others decisionmaker decided that such assets were now worthless or worse liabilities.)

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(2). Fact Base of Questions Regarding Surface Owner Rights: Any underground miner, including this DEIR miner, is subject to various legal duties to those who own the surface above or around the mine, such as, for example, duties of this 2585-acre underground mine to continue to provide subjacent and lateral support to prevent "subsidence," to avoid misuse or pollution of the local groundwater, and otherwise not to make nuisances or disturbances interfering with surface uses or harming the value of the surface estates. Here the disputed DEIR seems to pretend that there is no one on the surface above or around the 2585-acre underground mine (in fact, there are thousands of us), and that the DEIR miner is free to do whatever it wishes, whether or not described in the DEIR.

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Related Questions:

Why does the DEIR not address the thousands of surface owners' and users' legal rights in competition with the underground mine?

What amount of subsidence (or worse) should people living above and around the 2585-acre underground mine expect to experience from the DEIR described mining activities under realistic conditions, for example, assuming that the actual average rainfall/snowfall is only 80%, 60%, 40%, or 20% of what the DEIR claims for the period between 1967-2017 on account of climate change creating drier and more drought condition?

Ind 254-97

What would be the effect on the mine of hundreds of us locals living above and around the 2585-acre underground mine drilling our own competing wells to our own ground water, either (i) within the first 200 feet considered our surface when the property is above that mine, or (ii) deeper when the surface property is not above, but around the mine?

Ind 254-98

What would be the effect on the DEIR mine of a surface owner or user obtaining a court injunction against the mine allowing any intrusion of hexavalent chromium into our shared groundwater or our properties either (i) within the first 200 feet considered our surface when the property is above that mine, or (ii) deeper when the surface property is not above, but around the mine?

(3). Fact Base of Questions Regarding Local Law Reforms (See my # 3.N) To Clarify And Limit What Constitutes A Nuisance Or Other Wrong:

Ind 254-99

While government has the power to grant permits and approve EIR's for such projects, our laws, including our State and Federal Constitutions, also protect the competing rights of surface owners above and around mines and other neighbors from trespass, nuisances, and other kinds of objectionable conduct. If the government were to approve the DEIR and the mine, the thousands of affected people and others may consider whether some of the expected conduct at the DEIR mine could be a trespass or nuisance or otherwise sufficiently objectionable to begin passing self-defense laws that clarify or confirm what is a nuisance or is otherwise no longer to be tolerated as an intrusion on such personal or property rights. Rather

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than only address that in legal disputes, voters can be expected to elect like-minded officials and pass initiatives that add such protections to our laws. See my # 3.N. Obviously, the DEIR mine threat is merely the inspiration and example for the general need for such greater protections, and the laws would be of more general application, although that general application would include what such voters regard to be intolerable in the DEIR example. As noted above, once one mine is allowed in our community, it becomes a magnet for others and other undesirable businesses with negative environmental and other consequences, as happened in Richmond after Chevron and Benicia after Valero.

Related Questions:

When the thousands of locals living above and around the 2585-acre underground mine exercise their voting rights to protect and defend their interests with new local defense laws of general application, such as limiting mining hours, noise, vibration, and other protections and clarifications against what us locals would consider to be nuisances or other unacceptable conduct, what is the effect of that on the feasibility of the DEIR mine?

When the thousands of locals living above and around the 2585-acre underground mine exercise their voting rights to protect and defend their interests with new 'pay your share' laws, such as taxing certain commercial enterprises, including mines, that regularly use more than (say) 20 heavy truck trips during any 12 hour period during a day for more than an average of 20 days a month during any 6 months period on busy, two land roads within significantly populated areas [to be defined, but including the mining trucks planning to use roads like Brunswick and Idaho Maryland Roads in the Grass Valley area], what is the effect of that on the feasibility of the DEIR mine?

When the thousands of locals living above and around the 2585-acre underground mine exercise their voting rights to protect and defend their interests with new reporting and monitoring laws and regulations for the protection of those surface residents, as well as making that data public information readily available for our community, what is the effect of that on the feasibility of the mine?

C. Fact Basis of Examples of Specific Questions About The Financial Feasibility of the DEIR Miner And Miner Accomplishing the Mitigations Or Other Protections For Neighbors And The Shared Environment Assumed Or Represented In The DEIR, Including As Mitigation:

Based upon the admissions by Rise in its current SEC Form 10K and 10Q Filings, as demonstrated in my Objection at # 2, it appears that Rise has insufficient reported cash and credit to afford to accomplish what is represented or expected by its DEIR, even just to reopen the mine, not to mention to complete the needed safety and mitigation work. Indeed, the reported financial margins are so tight that the DEIR admits that the project is not feasible even if they were prohibited (as many of us locals demand) to only mining 12 hours a day instead of 24/7/365. Considering those and other factors, the government decisionmakers either must

reject the DEIR as not feasible, or demand to know who else besides Rise is going to provide the cash or credit to make this DEIR plan feasible. Stated another way, the decisionmakers should insist on knowing who is the "real" miner here, and on what terms and conditions. If this DEIR is a means to package a "flip" of the actual mining operations to someone else, such as a partner, operating tenant, loan-to-own lender, or other third party, the government decisionmakers should know that and all relevant details before any DEIR approval, as well as the CEQA data from the third-party funding operator. This is especially critical because the disputed DEIR already lacks essential information about Rise to enable the government decisionmakers to judge its character, financial condition, and track record to evaluate its ability to raise the funding it would need if it planned to mine itself.

Related Questions:

What is the source of funding for each aspect of the mining and related activities stated in the DEIR? If it comes from third parties, what are the terms and conditions for such funding, and why is that third party not participating as a disclosed party in the DEIR?

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Do the DEIR advocates deny that the character, financial performance capability, and track record of the miner are important factors in CEQA compliance and feasibility?

Considering the questions about its financial condition, what types and amounts of insurance coverage and surety bond coverage will this DEIR mining have? What is the risk of human error, and how is it mitigated for such hazardous activities and even the high-risk mitigations, like treating the mine water dumped into the Wolf Creek and NID system?

D. Examples of Specific Questions About The Margin For Mine DEIR Assumptions Or Contention Errors And For Changes In Applicable Laws, Regulations And Circumstances Affecting The Mining:

The disputed DEIR assumes the timely availability of everything it needs to timely accomplish everything as assumed, represented, or expected in the DEIR. In most cases there is no disclosure as to how or why such things must be true, feasible, or affordable, much less any relevant evidence. In other words, most of the DEIR are just words with no credible supporting foundation in relevant facts or evidence, such as demonstrated in the previous section # 2 about Rise's financial condition and funding and in the earlier discussion of the DEIR (at 6-14) admitting that the project was not feasible if it had to operate on a 12-hour instead of 24-hour day. See my discussions in my # 13 about the deficient Alternatives Analysis in DEIR #6. Whether or not so admitted or exposed from other Rise's public documents, the DEIR frequently seems to contemplate that everything must be done precisely as and when it is planned and explained in the DEIR. Since us local objectors do not imagine that any ultimate mining operation can be ultimately permitted in accordance with the DEIR's "only do it my way" approach, that makes the DEIR nonfeasible for more reasons than just insufficient funds. The time to find this out is now, rather than later when us locals successfully enforce our competing rights, such as, for example, during shortages for our competing rights to NID and

groundwater and if and when the miner complains for the first time about bad consequences for not giving the mine and others what the DEIR expected, unless the DEIR plan is allowed to take our competing shares of NID or groundwater and take other competing advantages of us for their unwanted mine.

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Related Questions:

Since it seems unlikely that all the mining and other activities in the DEIR will be permitted exactly as stated in the DEIR, what variances are possible for the DEIR to remain feasible, and what variances would make the project nonfeasible?

For example, how much less in NID or groundwater by volume, duration, or frequency can the project tolerate before the DEIR dewatering or other plans fail and the project ceases to be feasible.

Does the DEIR mine deny that, if (as we believe) the DEIR does not now fully and accurately reveal its true vulnerabilities in the inevitable competition for scarce, shared resources (eg, water or air quality) with those of us living on the surface above and around the 2585-acre underground mine, that the mine should be barred from complaining later when us locals insist on our competing rights and priorities?

Ind 254-100

Since, among the things, what matters most to those of us living on the surface above or around the 2585-acre underground mine are the preservation of the water table level sufficient for the survival of our forest trees and home plants, as well as human uses from NID or well water, what is the impact of the DEIR water usage of those concerns? Assuming no one impacted is convinced about the disputed DEIR's assumed "balancing" by imagined "recharge" by average rainfall incorrectly assumed to continue as between 1967-2017, what is the effect of the thousands of us drilling wells to tap our share of the groundwater we own on the mining plan of the DEIR that ignores any such competition?

Why is the DEIR claiming "credit" in its "balancing" claim of benefit for its DEIR dewatering plan sending our local owned community groundwater off downriver somewhere in the Wolf Creek, since that does nothing to reduce the dry and drought conditions for those of us who live above and around the 2585-acre underground mine?

Why does the DEIR imagine that NID wants the dangerous hexavalent chromium in the Wolf Creek that the miner is putting into the cement shoring for the underground mine, even if it were treated to the currently lax (but certain to change) standards of tolerance that offer no liability protection for the polluters? See my #'s 3.C, G, H, and 7.

E. Examples of CEQA Related Questions About Deficiencies And Noncompliance.

Ind 254-101

As discussed in my #'s 3.E and M, 4, 14, and elsewhere, including my supplemental filing to address certain CEQA issues, the disputed DEIR is challenged for error, omissions, and

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deficiencies regarding essential data. Without the ability to make informed decisions responsible government should not act to approve the DEIR, especially because any such approval would not convince any objector to tolerate the DEIR mining under the circumstances.

Related Questions:

In the many places where CEQA requires data in the DEIR that is omitted, deficient, or erroneous, is there any reason why the decisionmakers or local residents at risk should not assume that such noncompliance implies that the information is negative and sufficient to prevent approval of the DEIR? If the DEIR advocates contend that they should be excused somehow from compliance, why doesn't the DEIR request permission for such noncompliance and explain the purported justification? Why does the DEIR not explain omissions to the data us locals consider essential?

Ind 254-101

Since the DEIR often fails to support its contentions and assumptions with evidence or even credible reasoning, especially as to conditions relevant to the 2585-acre underground mine in the future, why should those unsubstantiated contentions and assumptions be rejected as mere speculation? Do the DEIR advocates deny that the burden of proof and persuasion for CEQA approval of the DEIR is on them, and not on the objectors?

What happens when and if the DEIR's asbestos, arsenic, and other hazardous substances (see DEIR #'s 7 and 10) mitigation or safety plans cease to be feasible, as, for example, if the miner cannot or fails for any reason to water the dangerous dust it brings to the surface?

Since the mine owes a legal obligation to provide continuous subjacent and lateral support for the surface owned and used by us locals above and around the 2585-acre underground mine to prevent subsidence and protect groundwater (see, eg, my #'s 3.D, E, F, M, 4, 5, 6, 8, and 12), why does the DEIR not address that risk when it reopens the mine closed and flooded since 1956 and that now is to be mined in new, expanded, and deeper places as to which the conditions are not revealed in the DEIR and probably have not even been investigated properly? See my # 3.E, 4, 5. 6, 7, and 8.

CONCLUSION:

For the reasons stated and others detailed in related objections to the DEIR and the mine, I urge that the disputed and nonfeasible DEIR be rejected as noncompliant with CEQA and as containing material errors, omissions, and deficiencies.

Sincerely,
/s/ Larry Engel
G. Larry Engel

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INDIVIDUAL LETTER 254: G. LARRY ENGEL

Response to Comment Ind 254-1

This comment is introductory in nature and the commenter states that the DEIR is inadequate. The commenter provides several examples but explains that the inadequacies in the DEIR will be fully explained in the comments below. In general, the commenter states that the DEIR is inadequate in the following areas: impacts to groundwater, the scope of the project (i.e., exclusion of the cleanup of the Centennial Industrial Site), the use of outdated hydrogeologic data, the presence of hexavalent chromium (Cr^{+6}) in the Cement Past Backfill (CPB), and the project's impacts to hydrology in the light of the drought.

Regarding the impacts to groundwater, the DEIR found this impact to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the proper scope of the project and cleanup of the Centennial Industrial Site, the commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Regarding the data used to estimate groundwater impacts, the commenter is referred to Master Response 13 – Historic Hydrogeologic Assessments. Regarding the hydrology impacts during the drought, the commenter is referred to Master Response 16 – Drought and Climate Change.

Regarding the presence of hexavalent chromium in the CPB, the DEIR states that chromium is a naturally-occurring trace component in the materials used to make cement, the binder for the CPB. Hexavalent chromium is typically less than two percent of the total chromium content in cement, while the total chromium itself is a very small component in the finished cement (approximately 220 parts per million.) Thus, the fraction of hexavalent chromium in cement is usually only about 0.000004 (or 0.0004 percent) of the total mass of the cement before forming any admixtures (e.g., concrete or CPB). (DEIR, p. 4.8-47.)

As the DEIR notes, it is only during the mining phase that Cr^{+6}could have any potential to leach from CPB, because that is when there would be air (oxygen) in the mine workings (Cr+6 can only form under oxidizing conditions). Once the mine re-floods, reducing conditions (very low dissolved oxygen levels creating a negative oxidation reduction potential) would return in the mine workings, which would prevent any leaching of Cr^{+6}. However, during mining, if there were any Cr^{+6} in the water within underground workings due to groundwater inflow, it would be reduced to Cr^{+3} (due to low oxygen levels in the water), which is relatively immobile in water and has a much lower impact on water quality than Cr^{+6}. Once the water was pumped from the mine any Cr^{+3} would generally precipitate out of the water in the pond or be removed by the physical filtration unit in the WTP. (DEIR, p. 4.8-48.)

Blasting or backfilling with CPB would be conducted exclusively within the underground mine workings. Thus, any water that contacts those components would be present only within the mine workings and would be pumped out of the mine workings by the dewatering system. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The dewatering causes a low-pressure area around the underground workings such that groundwater inflow is toward the mine, not from the mine toward the domestic wells. (DEIR, p. 4.8-58.) Additionally, in obtaining the Waste Discharge Requirements (WDRs) from the Regional Water Quality Control Board, the Project Applicant would ensure that the

leaching of hexavalent chromium would not cause any impact and would meet regulatory standards. (DEIR, p. 4.8-47–48.)

The commenter also discusses the project's impact to property values and whether the Project Applicant is adequately capitalized to undertake the project, should the County approve it. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-2

The commenter provides a Table of Contents for the Comment Letter. Responses to specific comments are provided below.

Response to Comment Ind 254-3

The commenter states that the DEIR inadequately analyzes a variety of project impacts but fails to specify how the DEIR is inadequate. The commenter states that the DEIR is inadequate for the following reasons: the scope of the project is not adequately described as it excludes the remediation of the Centennial Industrial Site and the commenter states that the project area is actually the entire 2,585-acre mineral rights boundary. The commenter also states that the DEIR underestimates the number of wells potentially impacted by the project and that the DEIR relies on outdated hydrological data in light of the current drought. The commenter states that the DEIR fails to analyze potentially hazardous constituents such as hexavalent chromium, asbestos, and arsenic. The commenter also states that the dewatering of the mine will adversely impact vegetation in the area. The commenter also states the DEIR inadequately analyzes noise and vibration impacts and the traffic impacts.

Regarding the DEIR's estimation of the number of groundwater wells impacted, the use of historical hydrology data, and the project's affect on groundwater in general, the DEIR analyzed the impact to groundwater supplies in Chapter 4.8 (Hydrology and Water Quality) and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 13 – Historic Hydrogeologic Assessment, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Regarding the assertion that the DEIR underestimates the true scope of project by excluding the cleanup of the Centennial Industrial Site and the entire 2,585-acre mineral rights boundary, the commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 7 – Location of Future Mining Areas.

Regarding the DEIR's treatment of hexavalent chromium, asbestos, and arsenic, the DEIR examined asbestos both in the Health Risk Assessment (DEIR, p. 4.3-61.) and in the context of emissions (DEIR, p. 4.3-80) and found the impacts to be less than significant after mitigation. Regarding hexavalent chromium, the commenter is referred to the portion of Response to Comment Ind 254-1 that discusses hexavalent chromium in CPB.

Noise and vibration impacts of the project are analyzed in detail in Chapter 4.10 of the DEIR, and transportation impacts are evaluated in Chapter 4.12. Regarding subsidence concerns, the commenter is referred to Master Response 29 – Near Surface Workings.

The commenter's concerns related to climate change and drought are addressed in Master Response 16 – Drought and Climate Change.

The commenter also describes at length the Project Applicant's financial status and the potential adverse impacts to real estate values that will result should the County approve the project. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-4

This comment seeks to incorporate "follow-up written filings" from the Nevada County Planning Commission hearing held on March 24, 2022 from organizations such as Community Environmental Advocates, Minewatch Nevada County, and the Sierra Club. It is unclear if the commenter is referring to those organizations' written comments received on the DEIR during the public review period which closed on April 4, 2022. To the extent that those organizations submitted written comments on the DEIR, the commenter is referred to the applicable responses to comments [e.g., Group Letters 6, 7 and 8 (CEA); Group Letters 28 through 32 (Wolf Creek Community Alliance; Group Letter 23 (Sierra Club); Group Letter 25 (South Yuba River Citizen's League; Group Letters 11 and 12 (Friends of Banner Mountain)].

Response to Comment Ind 254-5

The commenter discusses at length the financial condition of the Project Applicant and its filings to the Securities and Exchange Commission ("SEC"). The commenter states that the DEIR is flawed because of the lack of information indicating the Project Applicant is sufficiently capitalized to undertake the project. However, CEQA requires that the DEIR only evaluate the environmental impacts of the project. (Pub. Resources Code, § 21100.) "Environment" is defined as the physical conditions that exist within an area affected by a proposed project, including land, air, water, minerals, flora and fauna, noise, and objects of historic or aesthetic significance. (Pub. Resources Code, § 21060.5.) Economic and social effects that are nor related to physical impacts need not be evaluated in the DEIR. (CEQA Guidelines, § 15131(a).) Accordingly, the Project Applicant's financial condition, or the project impact on property values, does not fall within the scope of environmental impacts required to be discussed in the DEIR. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Regarding the commenter's tenuous references to dewatering and drought/climate change, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-6

The commenter states that the DEIR is inadequate for three reasons. First, the Project Description of the scope of the DEIR does not account for the entire 2,585-acre mineral rights boundary. Second, the DEIR excludes the remediation and cleanup of the Centennial Industrial Site. Third, the DEIR underestimates the impact to groundwater wells. Regarding the mineral rights boundary area, the commenter is referred to Master Response 7 – Location of Future Mining Areas. Regarding the Centennial Industrial Site, the commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Regarding the project's impacts to groundwater wells, the commenter does not explain how the DEIR is inadequate in this regard. The DEIR examined impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 254-7

The commenter references asbestos, arsenic, and hexavalent chromium but does not provide additional detail or explain the DEIR is inadequate in examining any impacts associated with asbestos, arsenic, or hexavalent chromium. The commenter is referred to Responses to Comments Ind 254-1 and Ind 254-3. The commenter also states that the DEIR fails to analyze the extent of the underground mine workings. The commenter implies that the project will include underground mining throughout the 2,585-acre mineral rights boundary. The commenter is referred to Master Response 7 – Location of Future Mining Areas. The commenter also states that the DEIR will result in groundwater depletion which will dry out vegetation and exacerbate wildfire risk but provides not additional information. The DEIR examined impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding impacts to vegetation, the commenter is referred to Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 254-8

The commenter states that the project will have adverse impacts to Property values within the mineral rights boundary and that the County should consider information submitted by the Project Applicant in various SEC filings. The commenter also states that the DEIR fails to adequately address the extent of mining operations throughout the entire mineral rights boundary. The commenter also states that the DEIR erroneously excludes the Centennial Industrial Site and the entire mineral rights boundary from the Project Description. Finally, the commenter is concerned that underground mining could lead to instability or collapse on the surface. Regarding property values and SEC filings, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response - 2 Social and Economic Impacts. Regarding the adequacy of the DEIR in regard to operations within the mineral rights boundary, the commenter is referred to Master Response 7 – Location of Future Mining Areas. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project under CEQA, regarding the assertion that the cleanup of the Centennial Cleanup Project should be analyzed in the DEIR. Regarding surface stability, the commenter is referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 254-9

The commenter references information in the Project Applicant's SEC 10-K Report. The commenter also expresses concern regarding the possibility of subsidence due to underground mining and states that the dewatering of the mine will cause adverse impacts to private groundwater wells. Lastly, the commenter is concerned about underground mining operations within 200 feet of the surface. Any information contained in the Project Applicant's SEC 10-K Report is irrelevant to the adequacy of the DEIR. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Regarding the possibility of subsidence, the commenter is referred to Master Response 29 - Near Surface Workings. The commenter's concern regarding impacts to private groundwater wells is addressed in Master Responses 14 and 15. Lastly, the DEIR states that no mining activity will occur at a depth less than 500 feet. (DEIR, p. 3-19; also see COA included in Master Response 7 – Location of Future Mining Areas.).

Response to Comment Ind 254-10

The commenter references the Project Applicant's SEC 10-K Report and asserts that the Project Applicant is either undercapitalized or will not receive adequate investment to make the project viable. The applicant also states that the project's impact to the water table will dry out vegetation,

making the area more prone to wildfire. The commenter also reiterates concerns regarding the project's potential negative impacts to property values. The commenter states that lowering of the water table will create new wildfire threats. It is assumed that this commenter refers to potential impacts to vegetation. The commenter states that the project will also result in subsidence within the mineral rights boundary. Regarding the potential impacts to vegetation, the commenter is referred to Master Response 33 – Groundwater Dependant Vegetation. References to the SEC 10-K Report or impacts to property values are not relevant to the adequacy of the DEIR's discussion of physical impacts to the environment. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. Regarding subsidence, the commenter is referred to Master Response 29 – Near Surface Workings. Regarding hexavalent chromium, the commenter is referred to the portion of Response to Comment Ind 254-1 that discusses hexavalent chromium in CPB.

Response to Comment Ind 254-11

The commenter states that the DEIR is inadequate because it does not fully explain the extent of new underground mining within the mineral rights boundary. The commenter also asserts there is a discrepancy within the DEIR regarding the daily production amounts of the project (i.e., 500 tons per day as stated on DEIR p. 3-19 or 1,000 tons per day as stated on DEIR p. 6-2.) Regarding the extent of new underground mining, the commenter is referred to Master Response 7 – Location of Future Mining. Regarding the daily production amounts, the project will general a total of 1,000 tons of mineralized material. (DEIR, p. 3-19.) As the DEIR states, the 500 tons figure refers to expected amount of barren rock, which will result from mine development. (DEIR, p. 3-19.) The 1,000-ton figure refers to the expected amount of mineralized material to be produced by gold mineralization production. (DEIR, p. 3-19.)

Response to Comment Ind 254-12

The commenter references the financial feasibility of the project. The commenter is also concerned that the truck traffic from the project will cause damage to local roadways. Regarding the financial feasibility of the project, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Regarding the potential for damage to local roadways, Mitigation Measure 4.12-6(b) of the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 254-13

The commenter quotes the second paragraph of DEIR page 4.8-51. The DEIR states in this paragraph that additional mining at depths greater than the existing underground mine workings is unlikely to impact groundwater due to reduced hydraulic connectivity. The commenter states that the DEIR is inadequate because it provides no discussion supporting this discussion. However, the DEIR's Appendix K.3 (Groundwater Model Report), prepared by environmental consultant Itasca Denver, Inc., specifically discusses and simulates the drawdown of groundwater levels at the end of future mining relative to the 2019 water level based on expected mining depths. (DEIR, Appx. K.3, p. 24 and Fig. 5-4.)

Regarding drought and climate change, please see Master Response 16 – Drought and Climate Change.

Regarding 1,000 tons versus 500 tons, please see the above response to comment.

Response to Comment Ind 254-14

The commenter states that the DEIR fails to disclose the harmful effects associated with the presence of hexavalent chromium in the Cement Paste Backfill (CPB). The commenter is referred to the discussion on hexavalent chromium in Response to Comment Ind 254-1. The commenter also states that the DEIR's Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) is inadequate because the study that the DEIR relied on (EMKO Environmental, Inc. *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project*, March 2020) does not take into account hexavalent chromium as a possible toxic air contaminant. However, as explained in the DEIR, whereas the small trace amount of hexavalent chromium present in the cement used for CPB presents a potential water quality concern, it would not pose an emissions concern. (DEIR, 4.8-47.)

Response to Comment Ind 254-15

The commenter reiterates concerns regarding the presence of hexavalent chromium in the CPB but the commenter does not state how the DEIR is inadequate in this regard. The commenter is referred to the discussion on hexavalent chromium in Response to Comment Ind 254-1.

Response to Comment Ind 254-16

The commenter generally states that the portions of the DEIR, including Chapter 4.8 (Hydrology and Water Quality) are inadequate but provides no specific information; thus no further response is necessary. Please see Master Response 1.

Response to Comment Ind 254-17

The commenter states that the DEIR's assumption regarding "balancing" and "recharge" ignores the realities of the climate change. The commenter is referred to Master Response 16 – Drought and Climate Change. As described in the WSA (Section 6.2 Additional Planned Future Potable Water Supplies) and in NID's 2020 UWMP (NID 2020 UWMP Section 4.9.1 Climate Change Effects), NID has analyzed climate change impacts to its water supplies. NID's Plan for Water is NID's vehicle to assess climate change impacts and develop and implement mitigation strategies and modifications to operate within climate change (NID 2020 UWMP Section 6.2 Resilience Planning). As part of the Plan for Water process, NID has developed a climate change hydrologic model to project and analyze supply availability under different climate change scenarios. Findings from this process will then be used to identify and evaluate mitigation measures. Mitigation measures could include the following: data gathering and information analysis enhancement to further inform decision making, hydrologic modeling enhancements, demand reduction measures, supply augmentation opportunities, and policy enhancements. The Plan for Water process is ongoing. As the Plan for Water process is developing mitigation measures for drought resiliency, NID will continue to implement its current drought and water shortage contingency efforts as described in NID's 2020 UWMP. See Master Response 16 (Drought and Climate Change) for additional discussion on climate change and drought.

The commenter also alleges the DEIR's discussion of NID's project water supplies and the statutorily required water supply assessment is inadequate. However, it is unclear what the commenter finds inadequate about these portions of DEIR Chpater 4.11 (Public Services and Utilities). The commenter faults the DEIR for only analyzing project water supplies until 2040. However, these planning horizons are derived from NID's Urban Water Management Plan and are not chosen by the Project Applicant. The DEIR analyzed the issue of sufficient water supplies

for the project and found the impact to be less than significant. (DEIR, p. 4.11-35.) In addition, the potential impacts to groundwater resulting from the mine dewatering operations for the project were evaluated through the use of a groundwater model as described in Appendix K of the DEIR. The groundwater model was based on the expected mining plan during year one to year 25, and Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. As shown in Figure 5-12, and discussed on page 29 of the Groundwater Model Report (Appendix K.3 of the DEIR), the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to significant incremental drawdowns as the mining progresses because the mining activities occur in deep, low hydraulic conductivity rocks. Please see Master Response 14 (Adequacy of Groundwater Model) for additional discussion on the groundwater model.

Response to Comment Ind 254-18

The commenter quotes and annotates the "Water Supply Sufficiency" paragraph from DEIR page 4.11-39. The commenter states that DEIR's assertion that NID will have sufficient water supplies during a 15-year projection is a "bait and switch" because the Water Supply Sufficiency discussion only considers surface water. NID does not utilize groundwater as an existing or planned source of water due to limited groundwater availability. (DEIR, p. 4.11-9.)

As stated in the WSA, the non-potable water demands for the project will not be served by NID, but will instead be met by groundwater through the proposed mine dewatering operations. Mine dewatering operations for the project were evaluated through the use of a groundwater model as described in Appendix K of the DEIR.

Response to Comment Ind 254-19

The commenter states that the DEIR's summary of NID water demand versus water supply during various hydrologic conditions does not take into account numerous residences that may have to rely on potable water due to impacts to groundwater wells. However, the commenter does not provide any evidence that additional groundwater wells may be impacted besides those identified in the DEIR. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

As described in the WSA (Section 2.3 and Projected Water Demand and Table 2-2 Projected Water Demand), and as described in the DEIR (Table 4.11-3), water demands for buildout of the project have been estimated in terms of potable water demands (to be served by NID) and non-potable water demands for mine operations (to be served from groundwater). Potable water demands are estimated to be 23,600 gallons per day (gpd), which includes 5,700 gpd for the Brunswick Industrial Site and 17,900 gpd for the residential uses on East Bennett Road. Non-potable water demands (to be served from groundwater) are estimated to be 84,000 gpd, which includes 40,000 gpd for water vapor in ventilation, 20,000 gpd for cemented paste backfill, and 24,000 gpd for concentrates and engineered fill. Because water uses for dust control and compaction of engineered fill are temporary and will occur only during the initial construction, and



are not part of the buildout mine operations, those water demands (42,000 gpd) were not included in the buildout water demand projections for the project.

Response to Comment Ind 254-20

The commenter states that the DEIR is generally inadequate, erroneous, or misleading. However, the commenter provides no specific information to support its assertions. The commenter reiterates that the DEIR underestimates the number of private groundwater wells impacted by the dewatering of the mine. Regarding the DEIR's estimation of the number of groundwater wells impacted and the project's affect on groundwater in general, the DEIR analyzed the impact to groundwater supplies in Chapter 4.8 (Hydrology and Water Quality) and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 13 – Historic Hydrogeologic Assessment, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter also states that the DEIR ignores the realities of climate change. The commenter is referred to Master Response 16 – Drought and Climate Change. The commenter also states that the water supply planning horizons should be the entire life of the project (i.e., 80 years.) However, the analyzed planning horizons are derived from NID's Urban Water Management Plan and are not chosen by the Project Applicant. The DEIR analyzed the issue of sufficient water supplies for the project and found the impact to be less than significant. (DEIR, p. 4.11-35.) Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-21

The commenter states that the DEIR fails to discuss potential impacts to additional property owners with groundwater wells who live within the mineral rights boundary. The DEIR analyzed the impacts to groundwater and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter also asserts, without evidence, that it is a certainty that additional property owners with groundwater wells will be impacted by the project. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 254-22

The commenter recites numerous figures regarding the potable and non-potable water demand required for the project in DEIR Chapter 4.11 (Public Services and Utilities), but does not specifically identify any inadequacies with the DEIR. For example, the commenter points out that the DEIR's estimate for total non-potable is 84,000 gpd (DEIR, p. 4.11-36) and claims that the DEIR does not identify or omits any non-potable water demand for the Centennial Industrial Site. However, the DEIR states that 42,000 gpd of non-potable water use is estimated for the Brunswick Industrial Site while another 42,000 gpd is estimated for the Centennial Industrial Site for a total of 84,000 gpd. (DEIR, p. 4.11-39.) Because the commenter does not articulate a clear criticism or identify any inadequacy with the DEIR, no further response is necessary (see Master Response 1).

Response to Comment Ind 254-23

The commenter states that project will reduce groundwater and surface water supplies to the point that local residents will be pitted against each other but provides no evidence to substantiate this assertion. The commenter also states that the DEIR ignores climate change and states that

relying on past rain data is misleading but does not provide any specific examples. The DEIR analyzed the impacts to groundwater and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 16 – Drought and Climate Change, and Master Response 13 – Historic Hydrogeologic Data.

The commenter implies that most or all of the property owners within the mineral rights boundary will lose their well water but provides no evidence to substantiate these claims. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

The commenter expresses concern about the treated water to be discharged to South Fork Wolf Creek and claims that the DEIR ignored hexavalent chromium. The DEIR does not ignore hexavalent chromium and the commenter is referred to Response to Comment Ind 254-1. Regarding the discharge to South Fork Wolf Creek the commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek.

Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-24

The commenter states that the DEIR is inadequate because it assesses project water supplies using a 20-year projection rather than the entire life of the project (i.e., 80 years.) However, as noted in the DEIR, the DEIR is not required to examine projected water supplies over an 80-year period. Instead, Water Code section 10912 requires a lead agency to identify the public water system that will provide water service to the project (i.e., Nevada Irrigation District or NID) and request the water provider to prepare a WSA for the project. (Wat. Code § 10910(a)-(c).) Water Code section 10910 (c)(4) requires that a WSA include a discussion with regard to "whether total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses." Accordingly, the Idaho-Maryland Mine WSA addresses these three hydrologic conditions through the year 2040. (DEIR, p. 4.11-20.) The commenter also states that the DEIR ignores climate change in assessing water supplies for the project. The commenter is referred to Master Response 16 – Drought and Climate Change. The commenter also questions the validity of the Water Supply Assessment itself (Appendix N) but does not state how it is inadequate. Lastly, the commenter references hexavalent chromium. The commenter is referred to Response to Comment Ind 254-1. Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-25

The commenter states that the DEIR references "water treatment complication problems" on page 3-15. However, DEIR page 3-15 contains no such reference. The commenter also states that the water treatment system could fail. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this

comment amounts to speculation, no further response is necessary. The commenter also references hexavalent chromium. The commenter is referred to Response to Comment Ind 254-1. The portion of the comment related to storms is somewhat unclear. Notwithstanding, the following is offered. DEIR Impact 4.8-3 analyzes the capacity of the water treatment pond and determines that sufficient capacity exists based on the storm events modelled. See also Appendix K.5 detailing Brunswick Industrial Site drainage and stormwater facility sizing. The clay-lined pond does not discharge and is designed to retain sufficient freeboard not to overtop (see page 4.8-73 of the DEIR).

Response to Comment Ind 254-26

The commenter states that the project's water usage is wasteful regarding activities such as dust suppression, but the commenter does not state how the DEIR is inadequate. The commenter also states that the DEIR ignores the realities of drought and climate change. The commenter is referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-27

The commenter states that the DEIR underestimates the scope of impacts to private groundwater wells and that the project will result in dire consequences to groundwater supplies. The commenter also states that the DEIR ignores drought and climate change. However, the commenter does not identify specifically how the DEIR is inadequate. Regarding the impacts to groundwater, the DEIR found this impact to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter is also referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-28

The commenter states that the DEIR underestimates the scope of impacts to private groundwater wells but provides no evidence to substantiate this assertion. The commenter also states that water usage associated with the project is wasteful but does not state how the DEIR is inadequate. Lastly, the commenter states that the DEIR obfuscates the estimated water usage of the project. Regarding the impacts to groundwater, the DEIR found this impact to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding water usage for the project, the total estimated project water demand is discussed in Impact 4.11-7 on pages 4.11-35 to 43. The impacts associated with water supplies for the project were found to be less than significant.

Response to Comment Ind 254-29

The commenter states that the project will negatively impact groundwater supplies, but the commenter does not specifically identify how the DEIR is inadequate. The DEIR analyzed impacts to groundwater and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter also references the dewatering process and the discharge to South Fork Wolf Creek but does not state how the DEIR is inadequate in this regard. The commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 254-30

The commenter reiterates that the DEIR fails to capture the true scope of the project i.e., the 2,585-acre mineral rights area and that the impacts to groundwater supplies may affect all property owners within this area. Regarding the assertion on the proper scope of the project, the commenter is referred to Master Response 7 – Location of Future Mining Areas. Regarding groundwater impacts, the commenter does not state how the DEIR's discussion of impacts to groundwater is inadequate. The DEIR analyzed impacts to groundwater and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-31

The commenter states that the dewatering of the mine would interfere with recharge of groundwater supplies but does not specifically state how or why the DEIR is inadequate in this regard. The DEIR determined that any impacts associated with groundwater recharge would be less than significant after mitigation. (DEIR, 4.8-54.) The commenter also references the property rights of owners near the project but does not comment on the adequacy of the DEIR. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 254-32

The commenter states that the DEIR contains no satisfactory scientific or informed discussion regarding the DEIR's discussion of recharge to groundwater. The commenter also discusses the groundwater property rights of surface owners within the project's mineral rights boundary. The commenter also states that the Itasca study regarding groundwater prepared in support of the DEIR is inadequate and that structure of the DEIR in general obscures the impacts to groundwater data. Lastly the commenter states that the DEIR uses inconsistent data throughout to describe the impacts to groundwater.

The commenter does not specifically explain why the DEIR is inadequate in any of the areas listed above. For example, the commenter does not identify why the DEIR is lacking scientific discussion regarding groundwater or why the Itasca study (DEIR Appendix K.3) is lacking. The commenter states that DEIR uses inconsistent data but does identify which data is inconsistent. The DEIR analyzed impacts to groundwater and found those impacts to be less than significant after mitigation. (DEIR, 4.8-54; 80.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The project-specific groundwater modeling was independently peer reviewed by the County's third-party consultant. The data used for the groundwater model and the conclusions of the groundwater model, as reflected in the DEIR, were peer-reviewed by the County's independent groundwater expert, who concurred with the conclusions of the DEIR.

The commenter's concerns about surface water depletion and drying out forests is addressed in Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 254-33

The commenter reiterates concerns that the DEIR fails to accurately discuss the extent of potential impacts to groundwater supplies. The commenter also references a statement from the DEIR on page 4.8-66 regarding the DEIR's conclusion that impacts to groundwater supplies could be significant absent mitigation measures. The commenter states that this statement on page 4.8-

66 is inconsistent with other portions of the DEIR that discuss groundwater. The commenter also states that the project will negatively impact tourism and economic values in the community. The commenter also states that the DEIR fails to acknowledge climate change and drought.

The commenter does not specifically state how the DEIR understates the scope of impacts to groundwater supplies. Additionally, the commenter does not specifically state how the statement on DEIR page 4.8-66 is inconsistent with other portions of the DEIR. Regarding impacts to tourism and economic values, the commenter is referred to Master Response 2 – Social and Economic Impacts. Regarding climate change and drought, the commenter is referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-34

The commenter quotes several passages from DEIR page 4.8-62 regarding the DEIR's discussion of impacts to groundwater supplies. The first passage states that mining would occur at deeper locations where fractures or geologic discontinuities decrease with depth due to the weight of overlying geologic materials, which in turn would not transmit significant quantities of water and impact groundwater wells. The passage then refers the reader to an Appendix which supports this assertion. The commenter asserts that the supporting models from the Appendix must be in the DEIR itself. However, there are no CEQA authorities that support this assertion. The commenter also states that the DEIR also fails to acknowledge climate change. The commenter is referred to Master Response 16 - Drought and Climate Change.

With regard to the other two passages, the commenter states that the DEIR fails to accurately discuss the extent of potential impacts to groundwater supplies. However, the commenter does not state how the DEIR's discussion of impacts to groundwater is inadequate. The DEIR analyzed impacts to groundwater and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Response to Comment Ind 254-17.

Response to Comment Ind 254-35

The commenter reiterates concerns that the DEIR fails to accurately discuss the extent of potential impacts to groundwater supplies. However, the commenter does not specifically state how the DEIR's discussion of impacts to groundwater is inadequate. The DEIR analyzed impacts to groundwater and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model. The commenter also states that the DEIR groundwater monitoring and mitigation plan is inadequate but does not state why the DEIR is inadequate. The commenter is referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells. The commenter also states that the project will impact wells throughout the entire mineral rights boundary, thus forcing County residents to switch to NID service, which will ultimately overwhelm NID's water supplies. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Please see Master Response 33 – Groundwater Dependent Vegetation, regarding the concerns about drying out forests and increasing fire risk. Please see Master Response 16 – Drought and Climate Change, regarding climate change concerns.

Response to Comment Ind 254-36

The commenter states that the DEIR fails to adequately analyze the risks posed by hexavalent chromium present in the CPB. The commenter does not explain how the DEIR is inadequate with regard to hexavalent chromium. The commenter is referred to Response to Comment Ind 254-1. Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-37

The commenter reiterates concerns that the DEIR failed to adequately discuss hexavalent chromium and that discussion of hexavalent chromium should have been included in DEIR Chapter 4.7 (Hazards and Hazards Materials). The commenter also discusses the PG&E Hinkley Chromium Cleanup and the movie *Erin Brockovich*. The commenter does not explain how the discussion of hexavalent chromium in Chapter 4.8 (Hydrology and Water Quality) is either inappropriate or insufficient. The commenter is referred to Response to Comment Ind 254-1.

Response to Comment Ind 254-38

The commenter details its general opposition to the project, stating that the project would result in no net benefit to the community and that there are better land uses available for the project site. The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1.

Response to Comment Ind 254-39

The commenter states that DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) is generally inadequate. The commenter also states that the DEIR admits that air quality impacts would be significant absent mitigation. One of the primary functions of an Environmental Impact Report is to inform lead agencies about the potential significant impacts of a project, and whether those impacts can be mitigated to a less than significant level. It is not uncommon for a project to have significant impacts before mitigation. The commenter also states that the DEIR inadequately discusses asbestos but does not explain how the DEIR is inadequate. The commenter also states that the DEIR fails to discuss air impacts from wildfire caused by the project or from fugitive dust because water supplies may be exhausted. Both of these concerns are speculative and do not pertain to the adequacy of the DEIR. Please also see Response to Comment Ind 254-17.

Response to Comment Ind 254-40

The commenter references inadequate mitigation measures for air quality impacts and Nevada County's existing poor air quality. DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) discussed impacts to air quality, including potentially impeding an air quality plan and exposing sensitive receptors to substantial pollutant concentrations. The DEIR determined these impacts to be less than significant after mitigation. (DEIR, 4.3-66, 78.) Regarding the commenter's question about "…what does the mine's carbon offsets elsewhere (see 4.3-96 plus) have to do with making our local air quality and climate change problems less severe…?," climate change is a global issue, and unlike criteria pollutant effects, is not localized. Thus, offsetting GHG emissions elsewhere in California is an entirely appropriate and industry standard approach to mitigating GHG emissions.

Response to Comment Ind 254-41

The commenter states that the Asbestos Dust Mitigation Plan ("ADMP") is inadequate because it does not consider the potential for deeper mining. The commenter also states the DEIR does not examine the potential possibility that the project will not have sufficient water supplies to control

fugitive dust. The commenter also states the DEIR fails to consider the possibility of human error. The ADMP consists of mitigation actions that take place on the surface and it is unclear how deeper underground mining would affect those actions. (DEIR, p. 4.3-83.) Regarding the unavailability of water supplies to control fugitive dust or the possibility of human error, these comments are speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Furthermore, water for fugitive dust control will be obtained from multiple sources (e.g., NID, treated groundwater at the Brunswick Site).

Response to Comment Ind 254-42

The commenter states that the DEIR is flawed because it assumes that emergency generators at the project site would only be operated for 100 hours per year. The commenter does not explain how this figure is erroneous. The commenter also states that the DEIR underestimates climate change. The commenter is referred to Master Response 16 – Drought and Climate Change. The commenter also states that the DEIR fails to discuss Public Safety Power Shutoffs ("PSPS") but does not state how the DEIR is inadequate in this regard, or why such discussion relates to an environmental impact. In addition, PSPS are addressed in Impact 4.11-6 of the Public Services and Utilities chapter of the DEIR. The commenter also discusses the PG&E bankruptcy litigation and the financial condition of the Project Applicant, both of which are not relevant to the DEIR. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 254-43

The commenter states that the "Non-CEQA Related Analysis" related Public Safety Power Shutoffs and the operation of generators onsite should have been included as a foreseeable impact of the project. However, as explained in Footnote 48, physical impacts stemming from a PSPS are too speculative for evaluation. Pursuant to CEQA Guideline 15145, an "EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 373.)

Response to Comment Ind 254-44

The commenter states that the DEIR's discussion of impacts due to odors is inadequate because the DEIR does not consider the possibility of odors from expanded and deeper mining. However, the DEIR only identifies potential odors emanating from diesel emissions from project trucks, the water treatment plant, and the ore processing. (DEIR, p. 4.3-84-85.) There are no odors associated with the underground mining component of the project and more expansive or deeper mining would not produce new odors. The commenter also questions why Mitigation Measure 4.3-7(b) (Carbon Offsets – Construction Emissions) is being proposed. Pursuant to CEQA Guideline Section 15126.4(c)(3), carbon offsets are permitted to mitigate for project emissions. (DEIR, 4.3-97.)

Response to Comment Ind 254-45

The commenter states that the DEIR's use of Footnote 48 on DEIR page 4.3-104 regarding impacts that are too speculative for evaluation is an excuse to sidestep a discussion of climate change. The commenter is referred to Master Response 16 – Drought and Climate Change. The commenter also states that the DEIR does not consider project impacts within the entire mineral rights boundary. The commenter is referred to Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 254-46

Please see Response to Comment Ind 254-17 and Master Response 16 – Drought and Climate Change. Regarding hexavalent chromium, the commenter is referred to the portion of Response to Comment Ind 254-1 that discusses hexavalent chromium in CPB. The commenter also appears to raise legacy contaminant concerns that could be generated by deep mining. For this, please see Response to Comment Grp 25-30.

Response to Comment Ind 254-47

The commenter states that the project will deplete groundwater supplies but does not state how the DEIR is inadequate in this regard. The DEIR examined the project's potential impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The remaining portion of the comment is identical to Comment Grp 254-17. The commenter is referred to Response to Comment Ind 254-17.

Response to Comment Ind 254-48

Comment Grp 254-48 is identical to Comment Grp 254-18 and a portion 254-19. The commenter is referred to Response to Comment Ind 254-18 and the applicable portion of Response to Comment 254-19.

Response to Comment Ind 254-49

A portion of Comment Grp 254-49 is identical to Comment Grp 254-19. To the extent that both comments are identical, the commenter is referred to Response to Comment Ind 254-19. The commenter states that the DEIR erroneously relies on past hydrological data and ignores climate change. The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments and Master Response 16 - Drought and Climate Change. The commenter discusses the statutorily required Water Supply Assessment and questions the validity of NID's statements regarding future water supplies. (DEIR, p. 4.11-49.) However, the commenter does not identify any inadequacies with the DEIR's discussion of water supply on which to formulate a response.

Response to Comment Ind 254-50

The commenter expresses opposition to the project but does not otherwise comment on the adequacy of the DEIR. The comment is noted for the decision makers. Please see Master Response 1.

Response to Comment Ind 254-51

The commenter expresses opposition to the project but does not otherwise comment on the adequacy of the DEIR. The comment is noted for the decision makers. Please see Master Response 1.

Response to Comment Ind 254-52

The commenter expresses opposition to the project but does not otherwise comment on the adequacy of the DEIR. The comment is noted for the decision makers. Please see Master Response 1.

Response to Comment Ind 254-53

The commenter addresses the financial condition of the Project Applicant. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. The commenter also discusses a number of legal issues and precedents but does not specifically discuss the adequacy of the DEIR; thus, no further response is warranted.



Response to Comment Ind 254-54

The commenter expresses opposition to the project. The comment is noted for the decision makers. The commenter also states that the cleanup of the Centennial Industrial Site should be considered part of the project. The commenter is referred to Master Response 4 – Cleanup is a Separate Project Under CEQA.

Response to Comment Ind 254-55

The commenter states that the discharge to South Fork Wolf Creek will contain hexavalent chromium. However, any hexavalent chromium that would be present in the water pumped from the mine would be treated before being discharged to South Fork Wolf Creek. The commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek. The commenter also states that the dewatering of the mine will dry out vegetation in the area thus increasing wildfire risk. The commenter is referred to Master Response 33 – Groundwater Dependent Vegetation. The commenter also references legal precedent regarding nuisance. The comment is noted.

Response to Comment Ind 254-56

The commenter reiterates concerns that the dewatering of the mine will dry out nearby vegetation. The commenter is referred to Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 254-57

The commenter expresses general opposition to the project but also references hexavalent chromium and the depletion of groundwater supplies. However, the commenter does not provide specifics regarding these topics. The DEIR examined the project's potential impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) See also Response to Comment Ind 254-17. Regarding hexavalent chromium, the commenter is referred to Response to Comment Ind 254-1.

Response to Comment Ind 254-58

The commenter discusses hypothetical scenarios related to climate change. Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-59

The commenter discusses legal precedents related to nuisance and inverse condemnation in the context of the possible subsidence. Subsidence is discussed in DEIR Chapter 4.6 Geology, Soils, and Mineral Resources. That Chapter of the DEIR determined that impacts pertaining to subsidence, liquefaction, or landslides were less than significant after mitigation. The commenter is also referred to Master Response 29 – Near Surface Workings.

Response to Comment Ind 254-60

The commenter references the Project Applicant's filings with the SEC. The Project Applicant's SEC filings are not relevant to the adequacy of the DEIR. The commenter references several potential impacts associated with the project but does not offer additional information. The commenter also states that cleanup of the Centennial Industrial Site should be analyzed in the DEIR. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Regarding hexavalent chromium, please see Response to Comment Ind 254-1.

Response to Comment Ind 254-61

The commenter urges the County to consider any potential impacts to property values resulting from the project. The commenter also references several potential impacts associated with the

project such as air quality, traffic, noise, and vibration. The commenter does not provide additional information or identify any inadequacies with the DEIR. The DEIR analyzed the referenced impacts in Chapters 4.3, 4.10, and 4.12. The commenter also discusses the financial condition of the Project Applicant. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. In addition, regarding subsidence, please see Master Response 29 – Near Surface Workings; regarding hexavalent chromium, please see Response to Comment Ind 254-1; regarding climate change, please see Master Response 16 – Drought and Climate Change; regarding water supply, please see Master Responses 14 and 15.

Response to Comment Ind 254-62

The commenter discusses potential economic impacts of the project and states that there are more desirable land uses that should be considered. The commenter is referred to Master Response 2 – Social and Economic Impacts. In addition, the repeated reference to a "larger" groundwater impact zone than identified in the supporting studies of the DEIR is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 254-63

The commenter states that the project's impact to air quality in the region will prevent residents from using wood stoves or burn their leaves. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary. The commenter also states that the project will negatively impact the tourism industry and will attack business that are large polluters. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-64

The commenter reiterates concerns regarding the project's potential impacts to property values. The commenter also states that the benefit of local employment is outweighed by the potential negative impacts of the project. The commenter is referred to Master Repose 2 – Social and Economic Impacts. The commenter also states that the cleanup of the Centennial Industrial Site should be included in the DEIR. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The commenter also urges the County not to approve the project. The commenter's opposition to the project is noted for the decisionmakers.

Response to Comment Ind 254-65

The commenter expresses concern that the County will not enforce the Mitigation and Monitoring Plan should the project be approved. The comment is noted for the decisionmakers. Please see Master Response – Operator Responsibility.

Response to Comment Ind 254-66

The commenter states that many aspects of the DEIR's Chapter 4.8 (Hydrology and Water Quality) are inadequate. For example, the commenter states that impacts to groundwater wells are likely to occur throughout the entire mineral rights boundary and that groundwater supplies will not adequately recharge after the dewatering of the mine. However, the commenter does not



state how the DEIR is inadequate with regard to Chapter 4.8. The DEIR discusses impacts to hydrology extensively and found that impacts would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Please also see Response to Comment Ind 254-17. The commenter also references hexavalent chromium concerns. The commenter is referred to Response to Comment Ind 254-1. Regarding climate change concerns, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-67

The commenter references a number of potential impacts discussed in the DEIR but does not comment on the adequacy of the DEIR. The commenter also references future underground mining throughout the mineral rights boundary. The commenter is referred to Master Response 7 – Location of Future Mining Areas. The commenter also references potential subsidence. The commenter is referred to Master Response 29 – Near Surface Workings. The commenter also states that the project will interfere with groundwater recharge; however, the DEIR analyzed groundwater recharge and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter also references the Sustainable Groundwater Management Act ("SGMA"), but that legislation only applies to recognized groundwater basins, which is not applicable for this project.

Response to Comment Ind 254-68

The commenter is skeptical that the project will not interfere with groundwater recharge, but does not state how the DEIR is inadequate. The DEIR analyzed groundwater recharge and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter asks where will the water come from to replace what the project takes away. The water will come from the fractured bedrock. As discussed in Appendix K.2 to the DEIR (page 19), the primary source of recharge is percolation of local rainfall into the fractured bedrock. In addition, as described in Section 3.3.2 of Appendix K.2, the amount of recharge each year also appears to be relatively constant since almost all of the wells maintain a consistent magnitude of seasonal fluctuation from year to year and there are no long-term trends observed in most of the wells that can be correlated to variations in annual water-year rainfall.

Response to Comment Ind 254-69

The commenter states that the project will result in adverse impacts to groundwater supplies but offers no additional information; thus, no additional response is required. The commenter also states that property values will be negatively impacted. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-70

The commenter is concerned about subsidence caused by the project. The commenter is referred to Master Response 29 – Near Surface Workings. The commenter also expresses general opposition to the project. The comment is noted.

Response to Comment Ind 254-71

With the exception of the first paragraph, Comment Ind 254-71 is identical to Comments Ind 254-17 through Ind 254-19. To the extent that the comments are the same, the commenter is referred to Responses to Comments Ind 254-17 through Ind 254-19. The commenter states that the DEIR is deliberately organized to be difficult to comprehend. The commenter does not explain how the how the DEIR's organization is inadequate.

Response to Comment Ind 254-72

The commenter references several potential impacts associated with the project but does not state specifically how the DEIR is inadequate. The commenter states that the DEIR fails to consider climate change. The commenter is referred to Master Response 16 – Drought and Climate Change. The commenter also states that the DEIR fails to account for additional mining within the mineral rights boundary. The commenter is referred to Master Response 7 – Location of Future Mining Areas. The commenter also states that the project will interfere with recharge of groundwater supplies. The DEIR analyzed the project's impacts to groundwater recharge and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model. The commenter also references hexavalent chromium concerns. The commenter is referred to Response to Comment Ind 254-1.

It is noted that, in reference to rock fracturing, mining uses explosives to break rock into smaller pieces so it can be moved. The small amounts of explosives used in mining do not open cracks and fissures beyond the immediate vicinity of the blast itself and would not open cracks outward, allowing water to flow from outside areas into the mine. As discussed in Section 4.2 of Appendix M, the breaking of rock includes drilling a number of parallel holes in the mine face. Generally, one or more of these drillholes are located near the center of the drill pattern and used as void or "relief" hole (open holes not loaded with explosives). The holes drilled around that hole are then loaded with explosives and are set off. That first hole "relieves" the blast and allows the least amount of explosives possible to break the first rock out of the mine face. The remaining holes located around the first blast are then initiated using a series of delays to progressively enlarge the blasted area until the final dimensions and profile of the drift are created. Any fracturing of rock outside of the blasted excavation is limited to a very few inches beyond of the drill hole and therefore the process cannot create the extensive cracks or fissures ostensibly envisioned by the commenter.

Response to Comment Ind 254-73

The commenter expresses general opposition to the project and states that project will negatively impact tourism and will eliminate an opportunity for more preferable land uses. The commenter is referred to Master Repose 2 – Social and Economic Impacts. For climate change concerns, please see Master Response 16 – Drought and Climate Change. Impacts to groundwater and thoroughly address in Chapter 4.8 of the DEIR, as demonstrated in Master Responses 14 and 15. The commenter also states that the project's impact to air quality in the region will prevent residents from using wood stoves or burn their leaves. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 254-74

The commenter states that the DEIR improperly segments the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The commenter also states that the DEIR fails to assess the impacts to groundwater supplies within the mineral rights area. However, the commenter does not state how the DEIR is inadequate in this regard. The DEIR analyzed groundwater impacts and found them to be less than significant after mitigation. (DEIR, p. 4.8-54.) Regarding the mineral rights areas, please see Master Response 7 – Location of Future Mining Areas. The commenter is also concerned about subsidence from underground mining. The commenter is referred to Master Response 29 – Near

Surface Workings. Regarding hexavalent chromium, please see Response to Comment Ind 254-1.

Response to Comment Ind 254-75

The commenter states that DEIR Chapter 4.7 (Hazards and Hazardous Materials) is inadequate because it does not discuss hexavalent chromium. However, the DEIR adequately discusses hexavalent chromium in Chapter 4.8. Additionally, the commenter states that the DEIR improperly segments the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Please also see Master Response 33 – Groundwater Dependent Vegetation, regarding the commenter's drought and dried vegetation concerns. The commenter also appears to raise legacy contaminant concerns that could be generated by deep mining. For this, please see Response to Comment Grp 25-30.

The commenter also alleges that the DEIR ignores the underground mining occurring in the 2,585-acres under the airport surface area. The commenter seems to imply that mining could adversely affect the airport, but does not specifically identify how. Thus, while the comment is unclear, the following is offered. Master Response 7 - Location of Future Mining Areas, and the attendant figures, show that the underground mining would not occur beneath the airport.

Response to Comment Ind 254-76

The commenter states that DEIR Chapter 4.9 (Land Use and Population and Housing) is inadequate because the commenter alleges that the project is incompatible with the project site. However, the commenter provides no additional detail on which to form a response. DEIR Chapter 4.9 found that general plan and zoning of the site is generally consistent with the proposed use, considering the requested land use approvals. (DEIR, p. 4.9-18).

Please also see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 254-77

The commenter states that DEIR Chapter 4.10 (Noise and Vibration) is inadequate because the Centennial Industrial Site is not a separate project. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Please also see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 254-78

The commenter states that the DEIR's analysis of noise and blasting does not account for potential areas of future mining. The commenter is referred to Master Response 7 – Location of Future Mining Areas and Response to Comment Grp 21-44. The commenter also points to the "Effects of Ground Cover" paragraph on DEIR page 4.10-24 and states that the DEIR did not apply this to other portions of the mineral rights boundary. However, the ground cover absorbs sound on the surface, so this concept does not properly relate to blasting noise. Any additional blasting within the mineral rights boundary would occur underground.

Response to Comment Ind 254-79

The commenter states that the project's impacts to air quality will eliminate opportunities for local residents to continue historical practices such as wood stoves and leaf burning but provides no evidence of this assertion. The commenter also states that project's water usage for dust control will exhaust NID water supplies. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or



inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 254-80

The commenter states that the project's dewatering of the mine will dry out surrounding vegetation and exacerbate wildfire. The commenter is referred to Master Response 33 – Groundwater Dependent Vegetation. The commenter also states that the DEIR fails to discuss the true emergency generator use due to PSPSs. PSPS are not scheduled nor are PSPS regular occurrences, but rather are instituted on an as needed basis when weather patterns present a particularly high danger for starting wildfires. Thus, the amount of generator use for PSPS is speculative. Nevertheless, page 4.3-103ff of the DEIR included an informational analysis of PSPS generator uses. The commenter does not state how this portion of the DEIR is inadequate.

Response to Comment Ind 254-81

This comment serves as a transitional paragraph within the comment letter. The comment is noted.

Response to Comment Ind 254-82

The commenter raises the topic of growth inducing impacts and states that the project is "undesirable" and would attract similarly undesirable businesses. These types of "quality of life" issues do not fall within the scope of CEQA. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-83

The commenter states that the DEIR fails to adequately list cumulative impacts but does not list any cumulative impacts; thus, no response is possible. The main contention of the commenter appears to be the commenter's oft-repeated claim that the DEIR only analyzed impacts within the Centennial and Brunswick Sites, rather than the entire mineral rights area. As has been repeatedly stated in the preceding responses, this assertion is addressed in Master Response 7 – Location of Future Mining Areas. The commenter also states that the project's impacts to air quality will eliminate opportunities for local residents to continue historical practices such as wood stoves and leaf burning but provides no evidence of this assertion, which is speculative and unsubstantiated. The commenter also states that project will attract undesirable businesses to the area. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 254-84

The commenter states that the "DEIR comments basically incorporate other DEIR section, and I, therefore, do the same where I have disputed and objected to those other referenced DEIR commentaries." The comment does not specifically address the adequacy of the DEIR and is noted.

Response to Comment Ind 254-85

Climate change concerns are addressed in Master Response 16 – Drought and Climate Change, and groundwater depletion is address in Master Responses 14 and 15. Regarding groundwater depletion as it relates to drying of vegetation and increasing fire risk, please see Master Response 33 – Groundwater Dependent Vegetation. The commenter states that the DEIR does not discuss "irreversible environmental changes" in Chapter 5 in a satisfactory manner but does not explain how the DEIR is inadequate. The commenter also states that the DEIR's statutorily required

section regarding significant irreversible environmental changes should include the dewatering of the mine. However, as the DEIR indicates, while the mine would be dewatered, the groundwater would be treated on-site and pumped back into the South Fork of Wolf Creek. Thus, the dewatering does not constitute a "large commitment of non-renewable sources." (DEIR, p. 5-8.)

Response to Comment Ind 254-86

The commenter states that the significant and unavoidable impacts listed in Section 5.6 underestimates the true number of impacts. However, the commenter does not list which additional impacts must be included in Section 5.6. The commenter states that the dewatering of the mine will dry out nearby vegetation causing additional visual impacts. The commenter is referred to Master Response 33 – Groundwater Dependent Vegetation. The commenter also states that noise levels will be higher than stated in the DEIR due to project operations, but does not state why, nor provide substantiation for this unmerited claim. The commenter also states that traffic will be worse than stated in the DEIR, but does not explain why, nor provide substantiation for this unmerited claim. No further response is possible or required.

Response to Comment Ind 254-87

The commenter defers to other commenters regarding the DEIR's Chapter 6 Alternatives Analysis. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. (see CEQA Guidelines, Section 15126.6(a).) The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. The commenter does not suggest any specific alternative.

The commenter also appears to suggest that the DEIR does not evaluate the full time period of project impacts. That this is not supported can be demonstrated by considering the groundwater analysis. The groundwater model relied on a 25-year hydrogeologic model to assess groundwater impacts from project implementation, based on known locations of mineralized gold ore and represents the underground location of where mining would occur during the first 25 years of mine operation. Sensitivity Scenario 6 used in the groundwater model considered the significant expansion of mining in areas with potential for mineralization, as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. This groundwater model scenario represents the reasonably foreseeable location of where future mining would likely take place after the initial 25-year period. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks.

As stated in Response to Comment Grp 7-82, the groundwater flow model would be updated periodically after dewatering commences and additional groundwater level data is collected to evaluate dewatering impacts. New groundwater level data and updated modeling would incorporate changes to the long-term mining plan, data from monitoring wells, and measured pumping rates. For further discussion, please see Master Response 7 – Location of Future Mining Areas.

The commenter also expresses general opposition to the project. The comment is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 254-88

The commenter states that the DEIR does not adequately portray the "No Project Alternative" but the commenter does not explain why. It is unclear whether the commenter is requesting evaluation of an additional alternative, or taking issue with the alternatives selected for evaluation in the DEIR. If the former, please see Response to Comment Ind 254-87. If the latter, the proffered reasons as to why the alternatives analysis is inadequate are unclear. There seems to be a suggestion that a version of the No Project Alternative should have been considered whereby the mine commences but has to subsequently shut down due to financial infeasibility. The lack of clarity in the comment precludes any further meaningful response effort on the part of the lead agency.

The commenter references the Project Applicant's SEC filings. However, those filings are not relevant to the adequacy of the DEIR.

Response to Comment Ind 254-89

The commenter states that the DEIR's Alternatives Analysis is flawed because it rejects a number of alternatives. Specifically, the commenter states that the DEIR erroneously dismisses other industrial uses because they are not more intensive than the project. However, the commenter does not state why such uses are less intense than the project. Please see Response to Comment Ind 388-6. The commenter references the Project Applicant's SEC filings. However, those filings are not relevant to the adequacy of the DEIR. Comment noted.

Response to Comment Ind 254-90

The commenter states that for this particular project CEQA allows for the consideration of the financial condition of the Project Applicant. However, under CEQA, the DEIR is limited to considering the project's physical impacts to the environment. The Project Applicant's financial condition or SEC filings are not relevant to the adequacy of the DEIR. Please see Master Response 1. Regarding hexavalent chromium, please see Response to Comment Ind 254-1.

Response to Comment Ind 254-91

The commenter generally states that the DEIR does not comply with CEQA and should not be approved. The comment is noted for the decisionmakers. Please see Master Response 1.

Response to Comment Ind 254-92

The commenter reiterates its concerns with the DEIR addressed elsewhere in the Comment Letter and states that that the DEIR is flawed and does not comply with CEQA. The comment is noted for the decisionmakers and the specific assertions regarding the DEIR's inadequacy are addressed in Responses to Comments Ind 254-1 through Ind 254-91.

Response to Comment Ind 254-93

The commenter reiterates its concerns with the DEIR addressed elsewhere in the Comment Letter and raises concerns regarding hexavalent chromium. The comment is noted for the decisionmakers and the specific assertions regarding the DEIR's inadequacy are addressed in Responses to Comments Ind 254-1 through Ind 254-92.

Response to Comment Ind 254-94

The commenter appears to state that the DEIR incorrectly applies the holding in *California Building Industry Association v. Bay Area Quality Management District* (2015) 62 Cal. 4th 369, but does not provide clear explanation on this point, thus precluding a meaningful response. The commenter indicates that they will provide more detail in a separate comment letter. Regarding the generally referenced groundwater depletion, please see Master Responses 14 and 15. Regarding climate change, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 254-95

This is an introductory comment for a series of concluding comments relating to the DEIR. The commenter also describes the County Planning Commission hearing in March 2022. The comment is noted.

Response to Comment Ind 254-96

The commenter states that the residents of the County are concerned about certain primary issues. Specifically, the depletion of the groundwater, the use of hexavalent chromium and the discharge to South Fork Wolf Creek, and the true scope of the project. The comment is noted for the decisionmakers and the specific assertions regarding the DEIR's inadequacy are addressed in Responses to Comments Ind 254-1 through Ind 254-91. Regarding the true scope of the project (i.e., the wells on East Bennet Road) and impacts to groundwater, the DEIR analyzed these impacts and found them to be less than significant after mitigation. Regarding hexavalent chromium, the commenter is referred to Response to Comment Ind 254-1. Regarding the discharge to South Fork Wolf Creek, the commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter disapproves of the DEIR and believes it does not accurately portray the project. The comment is noted. The commenter also asks why the DEIR has not considered climate change in connection with the project. The commenter is referred to Master Response 16 - Drought and Climate Change. The commenter asks why the DEIR does not identify and notify surface owners of the legal rights. This comment does not pertain to the adequacy of the DEIR. The commenter is concerned about the potential impacts to property values. The commenter is referred to Master Response 2 – Social and Economic Impacts. The commenter refers to the Project Applicant's SEC filings. The Project Applicant' SEC filings do not pertain to the DEIR. The commenter references performance standards and penalties for noncompliance. This comment does not pertain to the adequacy of the DEIR.

Response to Comment Ind 254-97

The commenter asks what amount of subsidence residents can expect should the project be approved. The commenter is referred to Master Response 29 – Near Surface Workings.

Response to Comment Ind 254-98

The commenter asks what effect the project will have on residents living throughout the mineral rights boundary with regards to groundwater. The commenter is referred to Chapter 4.8

(Hydrology and Water Quality), Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 254-99

The commenter asks what the effect an injunction obtained by a local resident would have on the DEIR in regard to hexavalent chromium. This comment does not pertain to the adequacy of the DEIR. The commenter discusses the rights of local residents pertaining to nuisance and trespass. This comment does not pertain to the adequacy of the DEIR. The commenter asks a series of questions regarding local residents exercising their rights. This comment does not pertain to the adequacy of the DEIR. The commenter references the SEC filings of the Project Applicant. This commenter does not pertain to the adequacy of the DEIR. The commenter asks a series of questions about the Project Applicant's financial condition. This comment does not pertain to the adequacy of the DEIR. The commenter states that the DEIR assumes that all of the preliminary project components will be completed on time. This comment does not pertain to the adequacy of the DEIR. The commenter asks, since it is unlikely that all mining activities will be permitted as envisioned by the DEIR, what variances are possible to ensure the viability of the project. This comment does not pertain to the adequacy of the DEIR.

Response to Comment Ind 254-100

The commenter poses a series of questions regarding the viability of the project under certain scenarios. These questions are speculative and do not pertain to the adequacy of the DEIR.

Response to Comment Ind 254-101

The commenter states that the DEIR contains omissions and inadequacies. The commenter asks about the enforcement of mitigation measures and obligations of the Project Applicant regarding subsidence. Regarding subsidence, please see Master Response 29. The commenter urges that the project not be approved. The comment is noted for the decisionmakers and the specific assertions regarding the DEIR's inadequacy are addressed in Responses to Comments Ind 254-1 through Ind 254-100.

Individual Letter 255

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RE: Supplemental Brief On CEQA Issues And Authorities ("CEQA Brief" or "Supplement") Supporting G. Larry Engel's Objection (the "Objection" or "Engel Objection") to the Draft Environmental Impact Report ("DEIR") SCH #2020070378 for the Idaho-Maryland Mine Project dated December 2021 (the "Project") In Response to the County of Nevada (the "County") Community Development Department's Related Notice dated February 7, 2022 (the "County DEIR Notice").

Dear Matt:

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Ind 255-2

On March 30, 2022, I filed my **"Objection"** to the DEIR regarding the Idaho-Maryland Mine referenced in the County DEIR Notice mentioned above, entitled, "Objections to the Draft Environmental Impact Report ('DEIR') [SCH #20200070378] for the Idaho-Maryland Mine Project dated December 2021 (the 'Project') In Response to the County of Nevada (the 'County') Community Development Department's Related Notice dated February 7, 2022 (the 'County DEIR Notice')" by G. Larry Engel. I incorporate by reference that Objection into this **"Supplement,"** including my March 30, 2022, cover letter, as if that and this "CEQA Brief" were one document as my "Objection." That incorporation by reference also incorporates by reference what my Objection incorporated by reference into itself, such as the other appropriate objections at the March 24, 2022, hearing or in follow-up written objections, such as those by the CEA Foundation, the Friends of Banner Mountain, and their constituent

organizations and members. The reason the documents were filed separately by me is that I needed more time for this briefing after learning at the March 24, 2022, County public hearing that the County may have a different interpretation than I do about the application under my described facts and circumstances of CEQA to my Objection and others. This is the supplemental brief I announced in that Objection would be coming to support my request for reconsideration of certain economic feasibility arguments in my Objection and to illustrate what I consider to be the correct interpretation of CEQA, in contrast to what the DEIR incorrectly asserts or implies to be the meaning and effect of CEQA.

After describing some general issues and less technical reasons for rejecting the disputed DEIR for CEQA noncompliance (before the technical ones to follow later in this Supplement), I have presented below some of my legal arguments based on the CEQA Guidelines and some key court decisions that reveal DEIR noncompliance with CEQA or other applicable law and illustrative case support for my competing interpretations used in my Objections. For example, I do a detailed examination of the **"common sense" and "good faith" CEQA test from the similar mining case of *Gray v. County of Madera*. That *Gray* analysis applies more strongly to defeat this disputed DEIR than it did to defeat the EIR in that case, especially by insisting on what my Objection addressed as a need for feasibility, good faith, clarity and reality/truth that avoided the illusions, distracting irrelevancies, misleading data, and other flaws resulting in the DEIR's "alternative reality" that often lacks "common sense" (as *Gray* said when insisting that its EIR mine mitigation had to place the neighbors' losing water in the same position they were in before the mining).**

1. **Some Introductory Reasons For Allowing My Objection As Consistent With The Correct Interpretation Of CEQA And Rejecting The Disputed DEIR Interpretations.**

Throughout the DEIR are citations to CEQA (or its "Guidelines," which for all purposes here (and in my Objection) I include as part of what I collectively refer to as "CEQA," to rebut DEIR's disputed positions. See generally the California Environmental Quality Act, Public Resources Code # 21000 et seq (the "CEQA" statutes) and 14 Cal Code Reg #'s 15000 et seq (the "CEQA Guidelines" or "Guidelines," respectively). Also, the DEIR in many places implies disputed CEQA interpretations as excuses for why the DEIR omits or deficiently describes information that I believe (and demonstrate below) are required by CEQA or other applicable law. One common example is the DEIR's frequent excuse for omissions on the abused theory that the missing data is too "speculative." Even worse, the disputed DEIR asserts incorrect, misleading, unsubstantiated, or otherwise objectionable positions, often cast as "assumptions" or "conclusions" that are even outside of the DEIR's own boundaries for what it considers to be required by CEQA. Under such disputed DEIR positions, any rebuttal by my Objection or others could be resisted without regard to its merits, simply as excludable by the DEIR (or the County, as lead CEQA agency) as beyond the disputed CEQA boundary.

What follows below explains more about correct boundaries for objections, as well as presenting other grounds for permissible rebuttal in my Objections, such as, for example, using DEIR or Rise admissions as evidence to impeach or rebut DEIR assertions or excuses for omissions. Note, for example, that the DEIR has a whole section at 4.3-103-104 called "Non-

CEQA Related Analysis," which opens the door to my Objection countering that without being limited by CEQA interpretations. Also, for example, consider that at the same time the DEIR (and apparently the County planners at the March 24 hearing) is insisting (incorrectly as I show below) that there should not be any economic feasibility rebuttal allowed, the DEIR asserts (at 6-14) that the project would not be economically feasible if it were limited to a 12-hour workday. However, there must always be an even playing field to allow my such rebuttals and counters in my Objection to any such DEIR errors, omissions, and deficiencies, both because I contend and demonstrate below that my Objection is CEQA compliant and that the DEIR is not compliant, and because I must also be entitled to impeach and rebut the DEIR no matter how counters to such errors, omissions, and deficiencies relate to CEQA. This brief supports that approach.

2. The Disputed DEIR Fails The General Requirements For An Adequate DEIR Under CEQA And Its Guidelines As Interpreted By Key Court Cases Like *Sierra Club v. County of Fresno, Gray v. County of Madera*, And Others. (More Specific Guideline And Court Decision Applications Are Discussed Further Below).

A. A Brief Review of the CEQA Guidelines At Issue Generally That Defeat The DEIR.

Ind 255-3

CEQA Guideline # 15151 specifies "Standards For Adequacy Of An EIR" that require the DEIR to be prepared "with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of the environmental consequences [of the 'project,' a term separately discussed later below]. ... [T]he sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. ... [T]he EIR should summarize the main points of disagreement among the experts." With reference to the court rulings addressed below, that Guideline notes that they are looking for "adequacy, completeness, and a good faith effort at full disclosure." This disputed DEIR fails each of those requirements in scores of ways addressed in my Objection and others. For example, my Objection demonstrates how the DEIR ignores entirely the hexavalent chromium threats in the cement paste the DEIR expects to use to shore up the 2585-acre underground mine, as well as the many mine dewatering and groundwater depletion issues, that are exposed in my Objections.

By a painstaking comparison of detailed DEIR provisions against reality (and against the other inconsistent parts of the DEIR) I demonstrate in my Objection more than 50 individual errors, omissions, and deficiencies, each of which should be fatal to the DEIR and which, together illustrate an objectionable or worse DEIR "pattern and practice" of avoiding any such "good faith effort at full disclosure" or any such "sufficient degree of analysis for intelligent decisionmaking about environmental consequences." See my discussion below of the "forecasting" required in Guideline # 15144. By ignoring its CEQA obligations, the DEIR tries to save itself from having to "summarize the main points of disagreement among the experts," but my Objection and others will force that compliance now. For example, the DEIR cannot survive the thousands of negative studies about hexavalent chromium on the EPA website, the

EU ban, the *Erin Brockovich* movie case study, and other data cited in my Objection and others, especially when the DEIR refuses even to acknowledge the existence of any controversy.

The "one size fits all" approach of the Guidelines sometimes makes them a poor fit for an unusual project like this attempt to reopen a gold mine closed and flooded since 1956. I doubt CEQA drafters expected some miner would attempt such a DEIR, for such mining (i) where there are now thousands of surface owners above and around the 2585-acre underground mine, and (ii) where the DEIR admits a massive lack of knowledge about the conditions that now exist in that mine or will result from the 24/7/365 blasting, tunneling, rock removal, dewatering, shoring up with hexavalent chromium cement paste, and otherwise doing mine work for 80-years. Rather than confront the "hard questions" and objections that would come from "good faith" compliance with CEQA, the disputed DEIR tries to evade those things and to create an artificial reality with massive information gaps and other errors, omissions, and deficiencies in the DEIR, such as by imaging that reality is too "speculative" to require any comment. My Objection and other reveal those wrongs and flaws, but many mysteries remain that create more unanswered questions (see, eg, my Objection #'s 14 and 15).

Guideline #15364 defines "feasible" as meaning "capable of being accomplished in a successful manner within a reasonable period of time [by or for the 'Applicant,' another term addressed further below], taking into account **economic,** environmental, **legal,** social, and technical factors." (Emphasis added) I address later the debate over "economic feasibility" and how my Objection # 2 data must be considered for many different reasons, including if only under the rules of evidence and *Gray's* common-sense test or *Sierra Club's* good faith requirement for impeachment and rebuttal of blatant DEIR errors, omission, deficiencies, and worse. But I note here that what the DEIR claims to be "infeasible" is often "objectively feasible," but simply infeasible personally for this financially challenged speculator looking for a speculator's profit. For example, in addressing the Alternative of working the mine for a 12-hour day instead of a 24-hour day, at 6-14, the disputed DEIR makes the unsubstantiated claim that the 12-hour day would cause the project to be economically infeasible. However, that is more of a comment about the unique, personal economic challenges of Rise exposed in its current SEC Form 10K and 10Q filings (see my Objection # 2) than about any objective feasibility, if done by a competent and financially capable miner. (However, that 12-hour day limit is high on the law reform goals of our local resistance by the thousands of resident voters living on the surface above and around the 2585-acre mine who don't want 24/7/365 blasting, tunneling, rock removal, dewatering, and other objectionable activities beneath us for 80-years, as explained in my Objection # 3.N.)

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Guideline # 15144 defines "forecasting" to "necessarily involve... some degree of forecasting ... [because] [w]hile foreseeing the unforeseeable in not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." That effort is part of the "good faith" required by cases like *Sierra Club*, "common sense" required by *Gray*, and others using similar concepts with different words or phrases. In any event, the DEIR made no such required effort, clinging instead to the unknowns of the mine closed since 1956 as an excuse lacking in good faith to avoid having to confront inconvenient truths, as demonstrated in my Objections, especially by the DEIR incorrectly insisting, without good faith or common sense, on ignoring the hexavalent chromium risks or on insisting that the future groundwater supplies had to replicate the past "recharges," even when the DEIR did not update ancient

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and unreliable mining condition data about the past, and despite climate change and the "new normal" making that past irrelevant and misleading, as described in my Objection # 3.M and below. Incidentally, Guideline # 15145 about "speculation" requires that the DEIR "should note its conclusion" that a "particular impact is too speculative for evaluation." That alert in the DEIR is the only way to flag for the lead agencies the need to make a decision as to who takes the risk of the unknown: the public living above or around the 2585-acre underground mine or the exploitive mining speculator who may prefer not to know and then have to explain what horrors may lurk in that long closed and flooded mine or may escape from the new, expanded, and deeper mining. Such willful DEIR ignorance of such unknowns should not give any benefit of any doubt to such speculator like in the DEIR. For example, as I demonstrated in my Objection at # 3.M, the DEIR considered the groundwater recharge adequacy for the rest of the 80-years of 24/7/365 mining after 2040 (when the largely inapplicable NID surface water data expired that the DEIR was incorrectly applying) to be too speculative to discuss. Similarly, the DEIR refused seriously to analyze the current conditions in the existing 2585-acre underground mine closed since 1956 and to investigate the unknown conditions of its new, deeper, and expanded DEIR mining there. In each such case, the lead agency now has to decide whether to deny the DEIR as too risky or worse (as the thousands of us locals living on the surface above or around the 2585-acre underground mine insist in objections) or else reward this foreign controlled, no net benefit mine with little capacity to pay for its mistakes or worse by allowing the DEIR mining without anyone knowing the resulting environmental consequences. (Because most of us prefer not to discover harms the hard way when they assault us, potential victims may prefer the self-defense actions by exercising our legal and political rights to stop the menace.) See my Objection at #'s 2, 3.A, B, M, and N and 4.

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This abuse of "forecasting" and evading disclosures as "too speculative" for DEIR comment is an especially intolerable excuse when the DEIR evades CEQA requirements without warning, such as by implicitly assuming without disclosure that inconvenient science and facts are too speculative, such as about climate change, future groundwater recharge, or the lethal toxicity of hexavalent chromium. For example, no rational person should have any good faith belief (as the DEIR claims) that our mine dewatering depleted groundwater around the 2585-acre underground mine will be reliably "recharged" in a future for the next 80-years of average rain from between 1967-2017. Yet, that is what the DEIR fantasy it insists that us thousands of surface residents and voters must tolerate for the next 80-years, while we suffer the new normal dryness and drought climate change as it menaces our property, our trees, our environment, and our community. See my Objection #'s 3.M, A, B, D, E, and F, 4, 5, and 14. Fortunately, the thousands of us on that surface above that dewatering depletion each own our shares of that same groundwater. Therefore, we can compete with the DEIR for our own owned groundwater with new and deeper wells, especially as the climate change droughts the DEIR insists on ignoring result in NID cutbacks. See Objection #'s 3 and 4. (The future for water is a zero-sum game, and none of us locals can tolerate this threat of 24/7/365 depletion of our shared groundwater that we have no less right to use than any mine, and, when our law reform efforts are accomplished, we may have superior rights). See my Objection #'s 3.N and Id. To put this in the wording of the Guideline # 15124 below, that is an example of a "reasonably foreseeable indirect impact" triggered by the DEIR groundwater depletion direct impacts.

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B. DEIR General Informational/Content Guidelines For Relevant CEQA Principles of General Application.

Guideline # 15121 describes how an EIR works as an informational document (and why us local resisting residents and voters above and around the 2585-acre underground mine are working so hard to prevent this disputed DEIR from becoming an EIR). Guideline # 15003 lists many court rulings that clarify the meaning and effect of CEQA, most of which are violated by this DEIR as described in my Objection and others. See generally, the descriptions in # 15002, including the stated public's right (at #15002(j)) to respond to this DEIR as I have in my Objections, because of the DEIR's many errors, omissions, and deficiencies. My Objection and others hopefully will defeat the DEIR, but anything that may survive a rewrite or challenge still does not limit the agency's ultimate discretion, which is critical, because of all the many aspects of relevant reality that the DEIR refuses to address at all or in a compliant and satisfactory manner. As noted herein, no responsible government can assign to us locals such burdens, risks, and harms for the benefit of these mining speculators proving no net benefit to our community from this mine (see my Objection #'s 2 and 4), such as the risks of the DEIR's unaddressed unknowns in the existing 2585-acre mine closed and flooded since 1956 and in that area for new, deeper, and expanded mining into unknown conditions, where the DEIR insists on exploring for gold at our risk as those living on the surface above or around that no net benefit, 2585-acre underground mine.

Ind 255-7

Guideline # 15120(c) requires the draft EIR to contain the information required by Sections 15122 through 15131, which my Objections and others demonstrate this disputed DEIR fails to do properly and completely as required. See, eg, my Objection # 12 responding to the disputed and deficient DEIR's # 5.1.

Ind 255-8

Guideline # 15148 "Citation" requires that: "The EIR shall cite all documents used in its preparation including, where possible, THE PAGE AND SECTION NUMBER OF ANY TECHNICAL REPORTS WHICH WERE USED AS THE BASIS FOR ANY STATEMENT IN THE EIR." (Emphasis added) As my Objection demonstrates, the disputed DEIR rarely does that, and, as a result, most of the DEIR should be regarded as unsubstantiated, because it generally fails to comply fully with that citation rule. The public should not have to hunt for purported authority among that mass of disputed and mostly irrelevant exhibits for the many dubious or otherwise suspect statements in the DEIR. (The point is that the DEIR's exhibits can be so challenged as flawed in some or many ways, such as being irrelevant to this DEIR mine's unique facts and circumstances, outdated, superseded by better science, incomplete or initially defective or self-serving, such as the mine's questionable pre-closing records before 1956, often before modern regulations and standards, etc.)

Ind 255-9

Guideline # 15150 addresses "incorporation by reference," which does not permit the DEIR to do what it did to purport to add substance to the deficient DEIR by adding a mass of its selected exhibits that are often inapplicable, irrelevant or worse to the facts and circumstances here at the 2585-acre underground mine that has been flooded and closed since 1956 and subject to all the issues addressed herein or in my Objection and others (and even some admitted in the current and past Rise SEC Form 10K and 10Q filings addressed in my Objection at #2). The DEIR's vague cross-references or missing cites to specific pages in that mass of exhibits are not compliant with that # 15150(c).

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Ind 255-11

Guideline # 15143 "Emphasis" dooms the disputed DEIR, which repeatedly fails properly to judge correctly what is "significant" and then to "focus on the significant effects on the environment," which must be discussed "with emphasis in proportion to their severity and probability of occurrence." My Objection notes such DEIR noncompliance many times as to many issues, but the most obvious is the DEIR's barely mentioning the hexavalent chromium and never discussing its risks and harms with any "emphasis." The groundwater depletion and other risks stated in my Objection also fail to receive proper "emphasis," because the DEIR never satisfactorily recognizes the fact of the thousands of us locals living on the surface above and around the 2585-acre underground mine, and that underground mine itself receives insufficient DEIR emphasis. Another need for "emphasis" is the failure to address the conditions in that 2585-acre underground mine (closed and flooded mine since 1956), both at the start of the new process, and when confronting the unknown conditions being created by the new, expanded, and deeper mining, all of which pose serious and unaddressed threats to both the environment and those of us locals living on the surface above or around that neglected, mine's "environmental setting."

Ind 255-12

Guideline # 15154 "Projects Near Airports" requires additional information in the DEIR, which is lacking, especially since some of the airport is above or around the 2585-acre underground mine, as noted in my Objection. That airport is essential to local fire defense and evacuation.

Ind 255-13

Guideline # 15142 "Interdisciplinary Approach" should also be applied to objectors for a "level playing field," to allow such interdisciplinary objections to have equivalent impact as the DEIR advocates.

C. Sierra Club v. County of Fresno (*"Sierra Club"*) And Related Cases, As Well As Those Listed In Guideline # 15003(a), (b), (c), (d), (e), (f), (g), (h), (i) and (j): Demonstrating The DEIR's General Noncompliance With CERA And Other Applicable Law In Fundamental Ways.

Ind 255-14

Without limiting the generality of those Guideline # 15003 and its cited court ruling principles, to which I will add additional data from *Sierra Club* and certain other precedents (before detailed analysis of the key *Gray* mining decision below to illustrate the application of these principles), I note that Guidelines 15002 and 15021 (among others) impose specific duties on the lead agency for the protection of our environment, our local community, and the public. By violating those duties, the DEIR disables our government from doing its own duties effectively, because of the errors, omissions, and deficiencies cited in my Objection and others. For example, without a total rewrite of the DEIR to add missing data and make corrections of errors and deficiencies, the County cannot do its duty "to respond to comments from the public" (# 15002(j)), to "respond to the information ["that the project could cause substantial adverse changes in the environment"]" by the actions listed in # 15002(h), and to make the findings in # 15002(g), as well as to do its duties to minimize environmental damage and balance competing public objectives in # 15021, such as to "not approve a project as proposed if there are feasible alternative or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment" (at # 15021(a)(2)). For example, consider: (i) the DEIR's incorrectly

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rejected Alternative of using the Brunswick site not as a mine, but rather as an industrial site (see my Objection # 13). [Note: of all the many absurd and unsubstantiated things in the DEIR, one most lacking in what the *Gray* case called "common sense" was rejecting that industrial site for the sole stated reason that it was too "intense." Compared to the DEIR's far more ultra-intense, divisive, risky, burdensome, harmful, and controversial mining, the industrial use looks tolerable versus such no net benefit DEIR mining proposal, especially if the goal is just a reasonable return on its mine purchase price, rather than a super-windfall gamble at our community's expense, as explained in my Objection at #'s 2, 4, and 13], and (ii) the DEIR rejecting a normal 12-hour day mitigation as economically infeasible, not objectively, but just for Rise's admittedly challenged financial condition and speculative goals [see Id.] Also, pursuant to #15021(b) and (d) the County may consider "SPECIFIC ECONOMIC, ENVIRONMENTAL, LEGAL, SOCIAL AND TECHNICAL FACTORS," as well as to use them to "balance a variety of public objectives." (Emphasis added) In addition, as described in Guideline # 15355 and elsewhere less than "significant" individual impacts can have cumulative significant effect as explained in my Objection, including from this project when "added to the other closely related past, present and reasonably foreseeable probable future projects." While Guideline # 15370 defines "mitigation" broadly for these purposes, the disputed DEIR mitigations are exposed in my Objections as deficient or worse.

With that background I will now offer a brief tour of the leading California Supreme Court case, *Sierra Club v. County of Fresno* (2018), 6 Cal. 5th 502 ("*Sierra Club*"), which I offer as a way of reducing the need for sorting through scores of seemingly inconsistent lower court CEQA cases, which are often debated without considering the distinguishing facts and circumstances that make most such contrarian, pro-EIR cases inapplicable to our DEIR dispute (that is one reason why I chose to add the *Gray* decision below to illustrate these principles in a more factually similar context.) The *Sierra Club* case involved a master planned seniors' community on 942-acres of former agricultural land to be built in five phases over 10-years. The County approved (and trial court upheld) an alternative plan that wisely "prohibited the discharge of treated effluent into the river from the wastewater treatment plant" (at 508), which the County should do here as well to protect Wolf Creek from the hexavalent chromium menace and other toxins that escape DEIR insufficiently described "treatment" for any reason. While the key issue left to the Supreme Court was the project's air quality menace that defeated the EIR, the court provided a useful description of the controlling standards and principles that should also apply here to protect us locals from such disputed DEIR mining.

Ind 255-15

The Sierra Club's conclusion was as follows:

> We conclude as follows [at 510]: When reviewing whether a discussion is sufficient to satisfy CEQA a court must be satisfied that the EIR (1) includes sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises [citing Laurel Heights I] ... and (2) makes a reasonable effort to substantively connect a project's air quality impacts to likely health consequences. As explained below, the EIR in this case failed to do so. ... or explain in meaningful detail why it is not feasible at the time of drafting to provide such analysis...

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The same defects apply to our disputed DEIR as to many risks, burdens, and harms addressed in my Objection and others. At to the "understanding" test, I had trouble understanding many DEIR issues, despite all my experience in other failed mines and their often-fanciful environmental impact reports, whose errors, omissions and deficiencies were exposed by realities revealed in the bankruptcies or other end-games, as they joined the rest of the more than 40,000 abandoned mines on the EPA list that the EPA and other governments seem unable to clean up or resolve. Little health data can be found in the DEIR, which is due in part to the general DEIR flaw of understating the problems, such as by ignoring hexavalent chromium entirely as a threat or blindly mining in the 2585-acre underground mine area without sufficient knowledge of what conditions now exist there or will be released by new, deeper, and expanded mining.

The next *Sierra Club* test of an EIR is stated at 511-12 as:

> The foremost principle under CEQA is that the Legislature intended the act 'to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language. ... [T]he [EIR] ... is a document of accountability. ... The EIR 'protects not only the environment but also informed self-government. ...
>
> ... 'An agency may abuse its discretion under CEQA either by failing to proceed in the manner CEQA provides or by reaching factual conclusions unsupported by substantial evidence. (# 21168.5.) Judicial review of these two types of error differs significantly: While we determine de novo whether the agency has employed the correct procedures, 'scrupulously enforc[ing] all legislatively mandated CEQA requirements [as a matter of law, with cite omitted], we accord greater deference to the agency's substantive factual conclusions. ...
>
> ***
>
> [After discussing the procedural issues, especially the question of whether the EIR's discussion of environmental impacts is adequate, the court continued at 513-14] Even if the Regents are correct in their conclusion that there are no feasible alternatives to the Laurel Heights site, the EIR is nonetheless defective under CEQA. As we stated in a context similar to CEQA, there must be a disclosure of the 'analytic route the ...agency traveled from evidence to action.'
>
> ***
>
> [T]he adequacy of an EIR's discussion of environmental impacts is an issue distinct from the extent to which the agency is correct in its determination whether the agency is correct in its determination whether the impacts are significant. '[A]n EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect. ... [citation for the ruling that 'The EIR's approach of simply labeling the effect as 'significant' without the accompanying analysis of the project's impact on the health of the Airport's employees and nearby residents is inadequate to meet the environmental assessment requirements of CEQA.' With another cite] An adequate description of

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adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core the EIR. See Guidelines #15151...

... But whether a description of an environmental impact is insufficient because it lacks analysis or omits the magnitude of the impact is not a substantial evidence question. A conclusory discussion of an environmental impact that an EIR deems significant can be determined by a court to be inadequate as an informational document without reference to substantial evidence. (At 514-15)

Our Courts of Appeal have consistently recognized that adequacy of discussion claims are not typically amenable to substantial evidence review. ... Noncompliance with substantive requirements of CEQA or noncompliance with information disclosure provisions ... may constitute prejudicial abuse of discretion within the meaning of Sections 21168 and 21168.5 ... [W]hen an agency fails to proceed [as CEQA requires], harmless error analysis is inapplicable. ... [and] the error is prejudicial. (At 515)

What that means to our DEIR is that most of my Objection and others can be resolved by the court as a matter of law de novo. The disputed DEIR has made its errors, omissions, and deficiencies so obvious that there is no way for the County to save them, and the DEIR must be rejected and redone, if they wish to try again. The DEIR is so deficient in most cases that the County has little to work with for its own analysis to satisfy the courts.

As the *Sierra Club* court stated at 515: "The courts have looked not for an exhaustive analysis but for adequacy, completeness, and a good-faith effort at full disclosure." The disputed DEIR here fails at each of those requirements, as demonstrated in my Objections and others. There is no sufficient such adequacy, completeness, or good faith in the disputed parts of the DEIR. What the Supreme Court considered deficient in its EIR for air quality is worse by comparison here, not only as to the air issues in my Objection at # 10, but also as to the many other such DEIR impacts that my Objection reveals to suffer from the same flaws. In each case it is prudent to remember what the *Sierra Club* court said (at 520-21) quoting the *Vineyard* decision I discuss below: "The relevant informational document here is the EIR, and the EIR must communicate not to the reviewing court, but 'the public and the governmental officials deciding on the project. ... The question is ... not whether the project's significant environmental effects can be explained, but whether they were." As demonstrated in my Objections and others, the DEIR is a massive and self-inflicted example of "hiding the ball" (see, eg, my Objection #'s 3.E, 14, and 15). Often those fatal omissions seem to be because the DEIR tries to abuse the excuse of the future being too speculative, but many problems about the mine that matter most have been ignored as inconvenient truths for which much could have been said consistent with CEQA, if the DEIR performed to the required standard. Unfortunately, being unwilling to address the "hard questions" (see, eg, my Objection #'s 14 and 15), the DEIR advocates left the County with a defective and noncompliant DEIR.

Ind 255-17

Please note here, however, that even Rise's own likely favorite cases do not allow DEIR claims that lack good faith or that are illusory, or speculation, or bogus assumptions. That is what appears to exist here, since my Objection # 2 proves that Rise currently cannot afford to perform the DEIR and mitigations, even as they proposed them, as distinct from what more will ultimately be required by government or courts or local law reforms, if the mine proceeds. That fact, largely based on Rise's own SEC 10K and 10Q filing admissions, makes the DEIR comments

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often "illusory" and suggests a lack of "good faith." That is especially true given all the DEIR's other "strategic" errors, omissions, and deficiencies exposed in my Objection without any good excuse, such as the DEIR only occasionally mentioning the use of hexavalent chromium in the mine shoring cement paste without any mention of it or its dangers in the DEIR's "Hazards And Hazardous Materials." See also my Objection # 3.E and M, where I illustrate other examples of obscuring data, insufficient data, strategic omissions, and other inappropriate tactics prohibited by CEQA cases like *Banning Ranch Conservancy v. City of Newport Beach* (2017), 2 Cal.5th 918, 940-41 ("**Banning**") and *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), 40 Cal.4th 412, 442 ("**Vineyard**"), each insisting on "a good faith reasoned analysis," rather than scattered or buried data, and unexplained data in exhibits.

In any event, under the applicable facts and circumstances in this case and a correct interpretation of CEQA and its Guidelines and relevant precedents (as distinct from distinguishable or other lower court decisions in need of correction by the California Supreme Court), I urge that everything in my Objection be considered. (The DEIR presented its disputed legal interpretations of various CEQA requirements, and so it's only fair and appropriate for the CEQA lead agency to consider my counters.) In the meantime, I believe that the DEIR is also irreconcilable with the following example California decisions (and relevant cases, statutes, and Guidelines cited therein). *E.g., Sierra Club v. County of Fresno* (2018), 6 Cal.5th 502; *Concerned Citizens of Costa Mesa, Inc v. 32nd Dist. Ag. Ass'n* (1986), 42 Cal.3d 929; *POET. LLC v State Air Resources Bd.* (2013), 218 Cal. App. 4th 681; *Gray v. County of Madera* (2008), 167 Cal. App. 4th 1099.

3. *Gray v County of Madera*: One Detailed Example Of An Illustrative CEQA Case Before My More Systematic Analysis of Authorities Supporting My View Of How CEQA Should Be Interpreted And Applied As To Particular Issues.

Ind 255-19

Consider the somewhat similar case of ***Gray v. County of Madera*** (2008), 167 Cal. App. 4th 1099 (**"*Gray*"**), where the court reversed the trial court's denial of the project opponents' challenges on **both CEQA and non-CEQA grounds, which defects the court found (at 1120) to be CEQA "prejudicial."** Those objectors sought the usual relief in such CEQA challenge cases, ie, (i) a petition for a writ of mandate to overturn a county's issuance of conditional use and mining permits for an 86-acre "excavation pit"/rock quarry (and related 35 acre "hot-mix asphalt plant," processing facility, administration complex, stock piles and processing areas, a road, and other project "accessories") for "aggregate" with approved rezoning pursuant to a certified environmental impact report (EIR), and (ii) a complaint for injunctive declaratory relief. The *Gray* mining would remove **900,000 tons of aggregate per year for 50 years involving 320 round trips by truck per day and consuming 72,000 gallons of water per day**. Unlike our DEIR mine so close to our suburban town with thousands of residents living on the surface above and around the 2585-acre underground mine, the *Gray* mine was in a cattle grazing area zoned agricultural with only "dozens of residences and 55 domestic wells within one mile of the project." As like our DEIR, there were many (175) public objections raising many of the same issues raised by my Objection and others, **including things this disputed DEIR (and perhaps some at the County) seems to resist as outside some imagined CEQA boundary, such as about (i) "economic or other feasibility," and (ii) similar "comments**

describing the impacts to their property value that would occur as a result of the project," thus rebutting the appropriateness of such property value as an objection topic, even without my added Objection twists, such as that trashing of our property values harms home and commercial construction jobs and the local economy. (Unlike our DEIR for a gold mine, which product has no local use and no net benefit here (see my Objection # 4), there was an arguable local need for aggregate in *Gray*, making that a stronger case for the approval than exists in our DEIR case.)

As usual in these disputes, the *Gray* court applied the statutory standard of review for "challenging an agency decision under CEQA" by asking: "(1) whether there is any substantial evidence in light of the whole record to support the decision; and (2) whether the agency abused its discretion by failing to proceed in the manner required by law. Pub. Resources Code 21168, 21168.5. *** The appellate court reviews the administrative record independently; the trial court's conclusions are not binding on it." at 1108-10. The "County has the burden of showing that there is substantial evidence to support its decision." at 1111. "The court then summarized its focus in applying those principles as follows:

> 'When assessing the legal sufficiency of an EIR ... the reviewing court focuses on adequacy, completeness, and a good faith effort at full disclosure.' [citation] 'The EIR must contain facts and analysis, not just the bare conclusions of the agency.' [citation] 'An EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.' [citation] 'Analysis of environmental effects need not be exhaustive, but will be judged in light of what was reasonably feasible. ...'
>
> As frequently occurs, many of the disputes in this case center on the question whether relevant information was omitted from the [EIR]. ... [Prejudice from such noncompliance is sufficient for reversal] if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.' [citations] at 1109.

In my Objection and others all those requirements are satisfied for rejecting the DEIR, including dozens of instances of strategic or tactical errors, omissions, and deficiencies in the disputed DEIR that evidence what that standard calls lack of good faith, such, among many other things, as burying controversial data in obscure places (eg, not mentioning the use of toxic hexavalent chromium in the DEIR's "Hazards And Hazardous Materials" section or most other places where one would look for such lethal substances) or manipulating and omitting crucial 2585-acre underground mining and groundwater data without mentioning the thousands of affected surface owners, hundreds of wells, and their competing surface and groundwater rights, as if the only DEIR concern were 30 dry wells along East Bennett Road. In any event, what follows illustrates how the Gray court applied those principles in a less controversial case than our stronger case against this disputed DEIR.

The first *Gray* court issue was to address two general challenges (at 1110) that "the EIR [the DEIR and FEIR collectively] failed to fulfill CEQA's requirement as an informational document and violated CEQA by failing to take into consideration the 'whole of the project,'" although, because of the way the objectors' case was presented, the court backed into those

conclusions by way of the specific issue arguments. So, I will discuss those specifics after putting aside the general discussion of the County's response to the DEIR public objections, because we are not yet at that stage in our DEIR process, although I note that, as the *Gray* court stated at 1110: "Under CEQA, the County is required to evaluate comments to the DEIR and prepare written responses. (# 21091, subd. (d), CEQA Guidelines # 15088.)" In our case that means those general violations occur as described in my Objection, because no court could possibly consider compliant the DEIR discussions, for example, of hexavalent chromium harms and risks, or the deficient groundwater depletion and other impacts on the neglected surface owners' and users' rights and ownership interests above and around the 2585-acre underground mine that the DEIR generally ignores. Consider this example question in testing adequacy, what do us thousands of such surface residents tell a buyer when we try to sell our homes in the impact or stigma zones above or around the 2585-acre underground mine? I studied the thousands of pages of DEIR materials to prepare a 150-page Objection about my top 50 or so outrages, and yet I still could not adequately inform a buyer if I tried to sell my house. For example, apparently to reduce DEIR controversy with us locals, we still do not even know from the DEIR where the 2585-acre underground mine is located by reference to surface streets in our suburban community above and around that mine. Indeed, the best information I could readily find about even parts of the burden, risk, and harmful realities of the 2585-acre mine (which I included in my Objection #2) came not from the DEIR, but from the Rise Gold Corp current SEC Forms 10K and 10Q on its website.

As is true as to my Objections to the DEIR (except for the hexavalent chromium horrors in our case not present in *Gray)*, the main *Gray* controversy (starting at 1111) also concerns the mine's impact on water. Unlike our disputed DEIR' errors, omissions, and deficiencies in discussing groundwater threats to us surface owners and users above and around the 2585-acre underground, rather than just the distinguishable situation of the 30 wells along East Bennett Road on which the DEIR attempts to distract our attention (see, eg, my Objection #'s 3.A, B, D, E, F, and M, 4, 5, and 14), the *Gray* EIR admitted the risk of depletion of neighboring wells and causing quality issues, although it tried to minimize the threat by attempted and deficient mitigation with replacement water and monitoring in ways that were unsatisfactory, although (as NID stated at the March 24 hearing) superior to what is proposed in our disputed DEIR. (Unlike our DEIR, where there is no monitoring for the hundreds of existing wells owned by the thousands of surface residents above or around the 2585-acre underground mine [with more wells to come as climate change drought cuts NID supplies] and no real analysis with any substantial evidence of that new, deeper, and expanded 2585-acre mining impact or of any viable mitigation of the problems, the *Gray* monitoring at least seemed to have included everyone, despite other deficiencies which the court found to violate CEQA.)

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For reasons noted below and that also apply to our disputed DEIR and are addressed in my Objection (see, eg, #'s 3.A, B, D, E, F, and M, 4, 5, and 14) and others, the *Gray* court concluded (at 1119-1120):

> **We are rejecting the County's conclusion on the water issues because we have concluded that the mitigation measures that were proposed to address the potentially significant adverse impacts on the water levels of private wells of neighboring landowners are not viable or effective. The**

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mitigation measures do not allow the landowners to use water in a manner substantially similar to how the landowners are currently using water because the mitigation measures (1) would allow Baker to replace potable water with nonpotable water, (2) could expose the landowners to new regulatory oversight in the use of their water, (3) would create a water supply system that does not reliably provide water at the times and in the amounts needed by the neighboring landowners, and (4) could cause new and potentially significant impacts on the environment. The only mitigation option that would address many of these problems is the proposal to build a new water system, but there is no substantial evidence to conclude that this option is even feasible. Thus, the mitigation measures are inadequate under CEQA. (Emphasis added)

All of those factors against approving the *Gray* EIR that fail to comply with CEQA are also applicable in my Objection and others to the disputed DEIR, except that there is no offer to build a new water system here on the surface above and around the 2585-acre underground mine (and, if there were such a proposal, as in *Gray* that would require its own new EIR and violate the CEQA rules against deferred mitigation [at 1118], among other objections. The DEIR mine dewatering treatment system here flows into the Wolf Creek and away from us locals.)

More importantly, as my Objection (at my # 2) demonstrated by Rise and DEIR admissions, no such mitigation is adequately analyzed by the applicable CEQA standards and, in any event, such mitigation is not reliable; eg, not currently affordable or otherwise feasible by the DEIR miner. More importantly, although it was not an issue in *Gray*, because the mine was entirely on owned property competing for groundwater with neighbors, in our DEIR situation there are also many of us surface owners above and around the 2585-acre underground mine who have additional rights to compete for our own share of the same groundwater as discussed in my Objection (see my #'s 3.A, B, D, E, F, M and N, 4, 5, 8, and 14), in addition to our rights to drill new or deeper wells, especially when climate change dryness and drought results in NID cut backs.

Ind 255-22

One of the most important rulings in *Gray* is as follows (at 1117-1118) in **rejecting some EIR mitigations as defying "common sense" (which as my Objection demonstrates is a common flaw in this disputed DEIR):**

We agree with RWQCB [California Regional Water Quality Control Board] that providing replacement water through bottled water is not a viable or effective mitigation measure. It defies common sense for the County to conclude that the providing of bottled water is an effective mitigation measure. As presented, ... [it] does not explain how and in what amount the bottled water will be delivered to the neighboring landowners. The measure requires replacement at least equal to the lost amount of water production from the landowners' wells. ... [discussing variable uses etc] Often landowners will be unable to predict their amount of water needs in advance. It is also unlikely that neighboring landowners have water meters that will help them calculate their water usage. Mitigation Measure 3.9-1b does not explain how it will address the issue of fluctuating water usage by supplying bottled water. A

Ind 255-23

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Ind 255-24

> **water system, as proposed by the Board, could solve the problem [although the court adds that: "The EIR also fails to examine whether building a new water system would cause significant environmental impacts"]. However, the proposal for a water system was never studied by the County staff. Thus, there is no substantial evidence that it is feasible to build a water system. Therefore, [it] ... does not present viable mitigation options.**
>
> **Furthermore, ... the EIR fails to explain how the use of nonpotable [project] water to irrigate the [neighboring] land [a mitigation measure] ... would have an impact on livestock, wildlife, and habitats. ... [or] how the water bottles that are used will be replaced or recycled. (Emphasis added)**

This same analysis applies to the disputed water truck alternative in our disputed DEIR addressed in my Objections, plus (as in my # 2) this DEIR miner has demonstrated no financial capacity to make any such mitigations feasible for the thousands of us living on the surface above and around the 2585-acre underground mine.

As *Gray* also explains further (at 1116-1117) regarding its "common sense" CEQA test of feasibility that should also defeat this DEIR, as explained in my Objections and others:

> **We agree with ...[objectors] that there is no substantial evidence that the mitigation measures are feasible or effective in remedying the potentially significant problem of decline in water levels of neighboring wells. In order to mitigate this problem ... [the miner] must present a viable solution that can effectively replace the decline in the water available to the neighboring residents. ... [W]e decline to ... [defer to the Board's findings because they] are not supported by substantial evidence or defy common sense. LAW IS NOT REQUIRED TO ABANDON COMMON SENSE. HERE, OUR COMMON SENSE INFORMS US THAT THE MITIGATION MEASURES WILL NOT EFFECTIVELY REPLACE THE WATER THAT COULD BE LOST BY THE NEIGHBORING LANDOWNERS. IT IS TRUE THAT THE MITIGATION MEASURES WILL PROVIDE A REPLACEMENT FOR THE LOST AMOUNT OF WATER. HOWEVER, NEITHER MITIGATION MEASURE ... WILL PROVIDE NEIGHBORING RESIDENTS WITH THE ABILITY TO USE WATER IN SUBSTANTIALLY THE SAME MANNER THAT THEY WERE ACCUSTOMED TO DOING IF THE PROJECT HAD NOT EXISTED AND CAUSED A DECLINE IN THE WATER LEVELS OF THEIR WELLS. (Emphasis added)**

Our disputed DEIR mine is even in greater violation of that "CEQA common sense" test than in the *Gray* case for all the reasons explained in my Objection, including what I demonstrate there in my # 2, where Rise admits its financial challenges and impaired prospect that make achieving anything to be accomplished in the disputed DEIR speculative at best, especially the vague and CEQA noncompliant mitigations as to water issues for us thousands living on the surface above and around the 2585-acre underground mine, whose fate the DEIR never sufficiently even considers, much less adequately resolves as required by *Gray* and "common sense." Note that, as quoted above, *Gray* insists that any such water mitigation must put us neighbors in the same water position as we would have been in if there had been no mine,

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and the DEIR does not even have a plausible approach to propose such a thing, which lack of feasible solutions to DEIR groundwater and NID water problems may explain why the disputed DEIR so often ignores those issues and generally avoids addressing the thousands of us living a normal suburban surface life (although in our beautiful forest) above and around that 2585-acre underground mine.

For example, as to the need so to preserve equivalent water realities for impacted neighbors consistent with "common sense," consider some of the many deficient mitigations the Gray court rejected, such as (at 1117):

> **"Mitigation Measure 3.9-1(a) provides that Baker could rehabilitate or deepen the neighboring wells to provide additional water. But there is no substantial evidence to conclude that the neighboring wells would provide additional potable water. [That mitigation measure] ... also would ... permit Baker to replace the lost water by providing a connection to the Project wells. The DEIR concedes that the water from the Project wells is not acceptable for consumptive uses and already provides that water for consumptive use would come from the remaining production in private wells or through Mitigation Measure 3.9-1(b) [the rejected water system idea]. Thus, the neighboring residents would have to change their water usage to use the water from their private wells for consumptive purposes only and the water from the Project wells for other uses. Besides this inconvenience, neighboring landowners may also need to comply with regulatory oversight because of their use of the nonpotable water, for example in landscaping irrigation, which may require the neighboring landowners to mitigate and remediate any degradation to underlying groundwater. ...** [In response to the County's argument that there are "confined" water conditions that enable such mitigation to escape regulation, the court responded that it was "unclear" that interpretation is correct, and the court continued] **However, of more concern is that there is no substantial evidence to conclude that the aquifer that supplies water to the Project and to the neighboring wells, which is currently confined, would remain confined over the [50 year] operational life of the Project. According to the [State] RWQCB, as the pit is excavated, it may function as a well that could connect the production wells with neighboring wells. Thus, the neighboring landowners could become subject to regulatory oversight in the future. ... Therefore, Mitigation Measure 3.9-1(a) is not viable because it does not replace the lost water from private wells with a substantially similar quality of water. (Emphasis added)**

The court explained (at 1119) that:

> [A lead CEQA agency can defer **detailing** certain mitigation measures] ...as long as the lead agency commits itself to mitigation and to specific performance standards. ... **[But] we conclude that here the County has not committed itself to a specific performance standard. Instead,** the County has committed itself to **a specific mitigation goal--the replacement of water lost by neighboring landowners because of mine operations. However, this goal is not a specific performance standard such as the creation of a water supply mechanism that**

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would place the neighboring landowners in a situation substantially similar to their situation prior to the decline in the water levels of their private wells because of the mining operations, including allowing landowners to use water in a substantially similar fashion to how they were previously using water. Moreover, the listed mitigation alternatives must be able to remedy the environmental problem. We have concluded that the listed mitigation alternatives, except the building of a new water system, cannot remedy the water problems because they would not place neighboring landowners into a situation substantially similar to what the landowners experienced prior to the operation of the mine. And the option to build a water system, which is the only effective mitigation that was proposed if it was feasible, was never studied or examined. Thus, the County is improperly deferring the study of whether building such a system is feasible until the impact occurs. (Emphasis added)

For such reasons as so stated by the *Gray* court, my Objections and others must also defeat the DEIR here.

Ind 255-25

My Objection at #'s 4, 8, 12, 13, and elsewhere also addresses some traffic issues, usually as they impact other environmental impacts like fire evacuation routes, road and infrastructure cost increases, and other harms and impacts on which I rely on other objectors whose greater knowledge I incorporate here. However, as part of my Objection's no net benefit from the DEIR mine analysis (at my #4), I note that the 50 to 100 trucks a day 24/7/365 for 80 years would be a substantial CEQA problem that was not mitigated by the DEIR, even if sufficient money was reliably available (about which locals are skeptical for reasons explained in my Objection # 2 from the miner's own admissions). However, because my *Gray v. Madera County* situation has a comparable problem for 50-years of "320 truck round trips per day" (at 1106), although in a more rural setting than our DEIR mine (at its # 4.12), I direct the County's attention to the following *Gray* analysis (at 1121-22), where the EIR admitted the traffic impact problems, but tried to mitigate them by the applicant paying an "equitable share" of the cost of construction of future improvements if requested by Caltrans or Madera County [with a formula] and to the long term maintenance fee based upon aggregate tonnage mined with no formula. I refer the County to that *Gray* court analysis at 1121-22, where the court analyzed the proposed mitigation and said: "the mitigation measures relating to traffic impacts are inadequate" (although more than what our DEIR proposes), expressing that the court "generally agree[s]" with the following objections of CEQA violations because such mitigation:

> **(1)** It is not enforceable; (2) it illegally defers development of the details and performance standards; (3) no substantial evidence supports the conclusion that the "fair share" fee will actually be spent on mitigation. In support of these three suppositions, Appellants complain that ["t]here is nothing in the mitigation measures that requires Caltrans or Madera County to actually impose impact fees." Also, "[t]he EIR fails to include any discussion of how or when the possible mitigation fees would be collected or spent, nor does it identify the extent to which the mitigation measures would alleviate the traffic impacts if some fair share fees were

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ultimately imposed." Finally, "**the County made no finding regarding the limitation or the feasibility of the county guaranteeing the funding for roadway improvements." We generally agree. (Emphasis added) [NOTE THAT THIS COUNTY GUARANTEE IS AN EXAMPLE OF ECONOMIC FEASIBILITY BEING USED IN REBUTTAL TO DEFEAT A CEQA MITIGATION CLAIM.]**

This same kind of criticism applies to the disputed DEIR as to many proposed mitigations to impacts about which my Objection and others complain.

For another example, consider the *Gray v Madera County* court's rejection (at 1122-23) of the "incorrect methodology in determining significance of noise levels." This analysis exposes similar flaws in our disputed DEIR at its # 4.10 and elsewhere for noise and other impacts addressed in my Objection # 9 and elsewhere. **For example, consider the court's demonstration (at 1123) how in that case "there is no single noise increase that renders the noise impact significant," but that the "cumulative noise impact" was significant.**

Ind 255-26

Thus, the EIR should consider whether the cumulative noise impact would be significant when increases of up to 2.1dBA are added to the existing noise level. For example, even though a 2.1 dBA noise in isolation will not be noticeable, when added to the already high noise level, it could cause a tipping point of noise problems for the general public. The EIR, however, does not analyze this issue and merely concludes that it would not be significant because "[i]t is generally recognized that an increase of at least 3 dB is usually required before most people will perceive a change in noise levels." This bare conclusion cannot satisfy the requirement that the EIR serve as an informational document. Moreover, the Board's statement of overriding considerations ... does not assist the County because it only considered one residence ... and did not consider the potentially significant impact of cumulative noise level. Thus, the EIR failed to adequately analyze the Project's impact on noise levels. (Emphasis added)

Ind 255-27

This same kind of criticism applies to the disputed DEIR as to many such unsubstantiated "conclusions" or "assumptions" (a consistent flaw in the DEIR about which I complained many times in my Objection) about impacts both as to noise and many other things. **Even more importantly, as I explain in my Objection #'s 3.N and 4, the disputed DEIR rarely is correct about its "cumulative impacts," and that is critical, because, as my Objection details (see # *4*), that is how this no benefit mine crowds out the more desirable future additions to our community by exhausting our environmental tolerance standards limits on a cumulative basis, so that adding even good uses becomes a future CEQA violation for such desirable additions, while we're stuck in indefinite disputes with this no net benefit mine that so blocks our community's opportunities.**

Ind 255-28

The *Gray* court concluded in its non-CEQA analysis that the County failed to comply with Senate Bill No. 610, Water Code sections 10919-10914 by failing to prepare a water supply assessment for the project that applies to "public water system" that was not applicable to the mine, except (the court held at 1131) as to the possible mitigation construction of a water system for the affected neighbors. As the court explained (at 1131) quoting the *Vineyards* precedent, that "requires the lead agency to identify likely water sources for a project" and

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required "assum[ing] that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the whole project." In *Gray* the County failed to analyze the impacts of providing water to the proposed water system. Thus, the County there, perhaps like the County here for this disputed DEIR, "must do a water supply assessment or provide substantial evidence to explain why it did not have to comply with Senate Bill 610." (Id.) See Guideline # 15155. **In this DEIR that means all those water uses addressed in my Objections not just for the Brunswick treatment facility for the dewatered groundwater it dumps into the Wolf Creek, perhaps for NID use, but also its insufficiently analyzed and deficient mitigation for the thousands of us surface locals who now have hundreds of wells above and around the 2585-acre underground mine and the multiples more such wells that will be drilled to compete with the mine, as it removes our shared/co-owned groundwater 24/7/365 for 80 years, assuming as *Vineyards and Gray* require that "all phases of the project will eventually be built and need water." See, eg, my Objection at #'s 3.A, B, D, E, F, and M, 4, 5, 8, 12, 13, and 14. There is clearly nothing sufficient or compliant about those issues in the disputed DEIR, which barely discussed those of us surface residents, voters, and competitors above and around the 2585-acre underground mine, which is an essential part of the project and our worst menace, as explained in many objections and addressed further below.**

4. **While the Parties Can Debate About The Extent Of Any CEQA Required Discussion Of "Economic Feasibility" By Itself As A Category For Analysis, Economics Factors And Feasibility Can Be Required Under Other CEQA Disclosure Categories And Are Certainly Appropriate Counter Evidence For Objections Impeaching Or Rebutting The Disputed DEIR.**

Ind 255-29

There is a legal debate about when and how economic feasibility considerations must be disclosed as its own category like water, air quality, traffic, etc. in order to comply with CEQA. Some argue, for example, that such discussions are part of CEQA # 21061.2 or CEQA Guidelines # 15064 or 15131 or others discussed below. But see CEQA Guidelines 15131. I argue that it depends on the specific legal context and required as to the issues raised in the DEIR and Objections like mine in this case, as discussed below where (as here) the particular facts and circumstances compel such disclosures, especially where those are factors compelled by what *Gray v. Madera County* above called "common sense" or by other applicable law our court rules, such as to prevent bad faith or worse. The California Supreme Court can eventually resolve that question later of how best to deal with DEIR's totally lacking in performance credibility. But this much is already certain and clear: there is no direct or indirect prohibition on economic feasibility discussions or other such topics outside of CEQA effects on the environment.

Before addressing below some cases and other approaches to requiring consideration of such evidence of economics, **consider in detail Guideline # 13131 "Economic And Social Effects,"** with which the DEIR fails to comply and which entitles my Objection to be fully considered by the County. **Section 13131(b) states:**

> **Economic or social effects of a project may be used to determine the significance of physical changes cause by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant.** [After another example of project noise disrupting church service the conclusion is] ... Where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant." (Emphasis added)

Guideline # 15382 "Significant Effect On The Environment" states: "A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

Guideline # 15021 (b)and (d) likewise invites consideration of "specific economic, environmental, legal, social, and technological factors," and: "(d) CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors ... and ...shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing ..." To set a baseline for such balancing the "Project Description" at # 15124(c) the EIR must contain a general description of the project's technical, ECONOMIC, and environmental characteristics ..." (emphasis added)

Such economic factors addressed in my Objection (see, eg, # 2) include more than the challenged financial condition of the miner admitted in its SEC Forms 10K and 10Q that appear to make the DEIR accomplishments unaffordable and, therefore, illusory. For example, as explained in my Objection, the real estate value losses caused by the mining to the thousands of us above or around the 2582-acre underground mine will cause many adverse effects, such as, for example, a loss of construction jobs in the area, self-defense competition against the mine by surface owners to salvage groundwater from depletion (eg, digging or deepening competing wells to preserve precious surface owned groundwater from being wasted in dewatering a no net benefit mine), and many other changes addressed in my Objection at # 3.N or 4, as us locals enforce our legal and political rights to mitigate what we regard to be the adverse impacts, risks, burdens, and harms of the DEIR mine.

The same can be said as to Guideline # 15131(c) stating: "Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR." As demonstrated in my Objection and others, there is no way to reconcile such DEIR mining underneath a suburban community on the surface above or around such a 2585-acre underground mine. Considering everything we locals stand to lose and suffer from this no net benefit DEIR mine, the physical competition and other legal and political exercises of defense rights to counter the mine will have many indirect physical impacts. See my Objection at #'s 3.N and 4. **Such effects will be cumulative and expose the DEIR to more disclosure objections under Guideline # 15130 "Discussion of Cumulative Impacts," especially since such DEIR**

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mining 24/7/365 for 80-years will cause continuous counter reactions by us adversely and continuously impacted locals until the mining stops.

In other words, there is no immunity for such omissions for the DEIR in other compliance or applicable law, and no prohibition on including such things in any opposition. See Kostka & Zischke, *Practice Under the Cal. Environmental Quality Act*, # 13.24 p.634 and Gray at 1120-1121, which states: **"CEQA requires that the lead agency analyze any significant physical changes that may be caused by social or economic impacts that are the result of the Project."**

While the open pit quarry in *Gray* did not have all such underground mining impacts in that court's view of those facts, our disputed DEIR project does involve facts and circumstances where social and economic impacts of the project do cause significant physical changes under that *Gray* test. Remember that us surface victims of mining impacts by the DEIR mining beneath us in the 2585-acre mine have our own rights to mitigate our damages (which is a necessary response to the DEIR related mitigations being illusory as unaffordable by this miner) as demonstrated in court precedents cited in my Objection #'s 2, 3.N, 4, and 14, where I discuss surface owners defending against the DEIR mine with competing new or deeper wells (a specific example of a mine caused "physical change" resulting from an economic impact on us living above and around the 2585-acre underground mine of knowing that none of the DEIR stated mitigation may be economically feasible (or credible or reliable) for this DEIR miner, which admits data in its current SEC Forms 10K and 10Q inspiring doubts about reliability of the needed funding or credit (or even mine "proven reserves" for attracting investment), as my Objection # 2 proves.

Unlike the *Gray* situation that failed to see in that case that "physical changes to the environment will result from any loss in the property value of neighboring lands that will arise from a potential decline in water levels in private wells," my Objection makes that case for physical changes here, because we are better focused on the difference between cause and effect. The DEIR trashing our property values is a motivation, and it incites us locals to resist, compete, and counter with the appropriate exercise of our legal and political rights, as described in my Objection # 3.N and elsewhere. However, it's implementing that defense and counter from that exercise of our legal and political rights and competition that "causes" the physical changes that courts like the *Gray court* wished to see. When us locals are battling to save our homes and trees, our groundwater and environment, and community way of life from the DEIR menace, it's reasonably foreseeable that we locals may counter with every legal and political tool at our disposal. Many of those have counters and competitions physical change consequences that must be addressed pursuant to CEQA, because this is more than just a battle for our environment. It may include us surface owners enforcing our legal and political property rights, for example, for more and deeper wells in direct competition against dewatering of the underground mine proposed by the DEIR, and the environment will be caught in that crossfire between those two sides. [I understand that NID has its own concerns about such local well competition against the mine as described in my Objection at #'s 3.N and 4, but instead of trying to moderate us locals in our well competitions that also affect the environment, I suggest that NID focus instead on stopping the mining threats to which we are reacting. But for this DEIR, nothing needs to change. However, if the mine is permitted, nothing will ever be the same again until the mining stops again.]

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For example (and saving more argument on this for discussion below), my Objection #3.N illustrates (ie, evidence) that (perhaps with some local law reforms from responsive officials or, if need be, by initiatives) I (and others like me) may exercise one of three defense options as such a surface owner to tap my own groundwater as necessary for the use of my home and to save my 48 plus tall trees (all over 50 feet and some heirlooms twice that) in competition with the DEIR mine's wasteful and harmful misuse of my groundwater 24/7/365 for 80-years for dewatering the mine when climate change dryness and drought result in an NID cutback (as I report previously suffering years ago when my East Bay MUD cut my water back to 50 gallons a day per person in order to comply with a mandate to ship our water to Marin County which had none; an experience I will not repeat by using one of my other such options): (i) I could drill my own competing well as deep as necessary and appropriate, (ii) I could make a sharing deal with one or more adjacent surface neighbors in exchange for funding to improve such wells to a sufficient depth to compete effectively, or (iii) I could organize a group of adjacent property owners to drill a competing community well for sharing such water in competition with the mine. (While NID or others may resist such ideas as environmental harmful, as I point out in my Objection # 3.N, it is intolerable for us surface owners to watch our property, trees, and environment suffer, while the mine dewatering depletes our shared groundwater and disposes of it down the Wolf Creek somewhere else. The solution for NID is to stop the mine, so none of this is necessary. Our voting numbers should enable us thousands of locals above and around the 2585-acre underground mine to arrange appropriate law reforms and political alliances that empower our defenses and enable such competitions against the DEIR mine. In any event, there seems no worse result for us that suffering this DEIR and mining approval.)

Ind 255-32

As explained throughout my Objection, including at my # 14, I note that the DEIR itself directly incites an economic feasibility dispute by its own disputed claims, such as at DEIR 6-14 claiming that the mine is economically infeasible if it were limited to 12-hour days (a key item on our new local agenda for political reforms, as explained in my Objection # 3.N), thereby requiring the County to realize that the cause of that problem is not the 12 hour day, but rather the DEIR miner's lack of working capital, credit, and financial resources as demonstrated in my Objection at # 2, quoting admissions from the current Rise SEC Form 10K and 10Q. Similarly, the DEIR attempts (and fails) to argue compliance with CEQA by citing to the DEIR's "Non-CEQA Related Analysis," and that empowers us to require the County to allow us locals to expose the errors, omissions, and deficiencies in that part of the DEIR with our own counter Non-CEQA Related Analysis, so there is a level battlefield. Indeed, as shown below and by a review of my 150-page Objection will confirm that many of my evidence and rebuttals at issue in this debate are counters that often use inconsistent quotes or admissions from the DEIR (or Rise as to its SEC 10K and 10Q filings addressed in my Objection at # 2).

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5. **My Objection Properly Uses Economic Feasibility And Other Challenged Rebuttals Not Just For CEQA Compliance, But Also As Evidence To Counter And Impeach The Disputed DEIR With Contradictions, Inconsistencies, And Admissions That Expose Errors, Omissions, And Deficiencies.**

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When a court evaluates a challenge to an EIR approval, it considers (under various standards, depending on the circumstances, such as discussed in *Sierra Club and Gray*) whether there was compliance with applicable law as a matter of law, or there was sufficient "substantial evidence" to support the lead CEQA agencies decision. THAT MEANS IT IS NOT JUST ABOUT WHAT CEQA REQUIRES OR PERMITS, IT IS ALSO ABOUT THE LAW OF EVIDENCE. See the California Evidence Code. When the County addresses whether to consider something like "economic feasibility" or other evidence in my Objection, it must also consider whether the courts will later accept such evidence, without regard to CEQA debates, because it is relevant use of DEIR miner admissions or otherwise admissible rebuttal evidence to "impeach" or counter the DEIR's false, incorrect, or misleading statements or omissions. Truth and reality still matter for CEQA compliance, and the DEIR cannot just present a false or misleading "alternative reality," such as by asserting something false as a fact or something impossible as if were real, true, and happening. To state the obvious, only a DEIR that comprehensively speaks the truth and presents reality can be approved, as *Gray* illustrated in its insistence on "common sense" and as *Sierra Club* insisted on "good faith."

The DEIR cannot prevail by simply insisting on presenting one-sided, miner propaganda that the objections can expose as false, misleading, or otherwise objectionable with counter evidence, especially when the objection quotes the miner's own admissions, inconsistencies, and falsehoods against the DEIR to expose its errors, omissions, or deficiencies. Each statement in the DEIR that is incorrect or misleading can be impeached by rebuttal evidence, which cannot be excluded if as a matter of evidence law (as distinct from CEQA) it is relevant and admissible. That is true even as to the admissions in Rise Gold Corp's current SEC Form 10K and 10Q filings that reveal why the DEIR must be rejected, because those documents admit (with its own accountant's adding a "going concern qualification" as to Rise's financial statements) that there is no apparent sufficient funding to accomplish even the startup expenses of reopening the mine and beginning operations as planned in the DEIR, much less doing the DEIR mitigations that are needed. See my Objection #'s 2, 4, and 14. The very existence of the DEIR mining threat is already harming our real estate values and causing other burdens, risks, and harms, so this process cannot be about some hypothetical plan where government empowers an insufficiently funded miner with an option "to shop" this disputed opportunity.

What my Objection does, and other objections could do, is expose with such evidence DEIR's many internal contradictions to prevent the DEIR from prevailing inappropriately, such as by my Objection exposing contrary or inconsistent statements either (i) within the DEIR, or (ii) in the current Rise SEC Form 10K or 10Q, which (as I show in my #2) discusses many of the same mining related issues as the DEIR in different, inconsistent, or even contradictory ways. The California Supreme Court's most important lesson about CEQA in *Sierra Club* is the need for both clarity and truth. Objectors like me are entitled to challenge a DEIR that "crosses those lines." Especially at times like this in our divided world's larger conflicts, where constant barrages of false news/propaganda seek to create "alternative realities" (eg, Russia's distortions and worse about Ukraine), it is important to remember that the rule of law itself depends on having one clear and truthful reality. The DEIR often can be shown to fail that test, and the DEIR needs to be redone to clarify the actual reality of this mine. To do that requires corrections and edits to the DEIR consistent with my Objections and similar other objections.

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Furthermore, the County should also allow appropriate consideration of accepted matters to which courts would take "judicial notice" as matters of fundamental logic or reality, to prevent obviously false or misleading claims from being accepted by denying contrary such common sense and proof. For example, if Rise were to say, "Don't worry about any dry wells or health or safety rules, because I'll just pay any victims to make them whole" (an exaggerated version of the disputed DEIR claim to cover anyone whose well dries up, which my #2 proves is also illusory or speculative), that would imply that Rise had the ability to accomplish that implausible claim. Why? Because people are not allowed to just invent nonrealities contrary easily proven facts in the real reality, especially by admissions from the person asking a court or government official to join in that fantasy to officially (but incorrectly) pronounce it to become real. See what *Gray* insists must be "common sense" and what *Sierra Club* and others address as "good faith," but what most of us objectors consider basic truths that define "reality," as opposed to the "alternative reality" created by the disputed DEIR, such as when it insists on pretending there will be sufficient "recharge" of our local owned groundwater simply because the disputed DEIR claims average rain between 1967 and 2017 will somehow reoccur and be sufficient. See my Objection at #'s 3.A, B, D, E, F, M, and N, 5, and 14. When the rule of law applies (and as CEQA must apply here), no naked "emperor" is allowed to insist that he's wearing a fancy suit, because we allow people to say the clear truth that "the emperor has no clothes." This is what my Objection and other objections seek to do about this DEIR. For example, the admissions I cite in my Objection # 2 should be allowed to rebut that illusory DEIR assurance that somehow, without even knowing the huge number of affected old and new wells over even a shorter period than 80 years, the DEIR miner will be able to supply the needed replacement water.

Ind 255-34

Please remember that the DEIR itself put its financial feasibility into issue for rebuttal by claiming (at DEIR page 6-14) that limiting mining to a 12-hour day made the project economically infeasible. Since DEIR uses that claim to defeat better "Alternatives" (ie, the traditional industrial use) and mitigation, the law requires allowance of such rebuttals in my Objection and others. That admission by the DEIR itself at page 6-14, by manipulating the data on "Alternatives" thereby legally "opened the door" for all my economic feasibility counter arguments, and it illustrates the DEIR's inconsistency.

Ind 255-35

When the DEIR wants to plead poverty like that, it does. But then the DEIR also implies its financially capable when it wants to make implied or express promises of being able to afford whatever mitigation may become necessary (eg, providing water to all dry well owners). The DEIR cannot have it both ways without us being able to expose that nonreality one way or the other. See, eg, my #'s 2, 4, 13, and 14. Yet, when the DEIR discusses (eg, 4.8-66) replacing such hundreds of wells as the dry up over time (besides the 30 along East Bennett Road), Rise's current financial condition and questionable future prospects discussed in my #2 prove that mitigation is not reliable, as it lacks sufficient evidence of financial capacity to accomplish such mitigation and other DEIR project work, especially as the climate change that the DEIR ignores forces many of us to drill more and deeper competing wells to reach our own groundwater as NID supplies are reduced. See, eg, my #'s 3.D, E, F, M, N, 4, 5, 8, and 13. Indeed, that is what the DEIR itself admits it cannot accomplish (at 6-14) if it's limited to a 12-hour workday, as objectors may still demand as law reform. A CEQA and legally compliant DEIR would have to

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disclose such realities, and, when (as here) the DEIR fails to do so, objectors must be allowed to expose them.

Furthermore, **another DEIR "opening of the door" to my less CEQA-traditional rebuttals is the DEIR's "Non-CEQA Related Analysis" at 4.3-103-04, incorrectly purporting an attempt to show "good faith," but allowing us locals to prove the opposite, if we are allowed to do so before court processes apply the rules of evidence in favor of my such objections. My point on this also includes this related DEIR admission: that some of what the DEIR (and perhaps some at the County) considers to be outside some disputed CEQA boundary is needed for essential clarity. This means one of two alternative admitted things: either the disputed DEIR CEQA "boundary" is wrong, or essential clarity of purpose and what they incorrectly consider "good faith" requires going beyond the CEQA constraints. Either way, if the disputed DEIR can include what they call "Non-CEQA Related Analysis," then we objectors must also be able to respond and counter in kind without limitations about CEQA.**

This cannot be a one-sided process where the DEIR can make any infeasible, false, or misleading claims they wish, while us objectors are not permitted to rebut and expose those claims. The reality is that in many instances the disputed DEIR fails to comply with applicable law, because its purported safety and mitigation assumptions and so-called facts, goals, and contentions addressed in my Objection and others are not only incorrect, deficient, and otherwise noncompliant, but also are illusory (as in not reliably funded). The CEQA lead agency must allow us to prove those objections by accepting our substantial evidence to the contrary, including fatal admissions by the DEIR and the miner, including as to economically infeasibility. As I prove in my Objection # 2, Rise and its accountant admit that there are "going concern" financial issues that make its performance at best too speculative and at least as to some things admittedly probably infeasible. When the miner's accountant warns the investors to beware that the mining may not be feasible for lack of sufficient funds, how can any responsible government not at least test the more obvious DEIR performance capability illusions?

Ind 255-36

In any event, I made my offer of proof as to such admissions, DEIR contradictions and inconsistencies, and other evidence (and their applications) in my Objection # 2 and other places in requesting such County reconsideration to require consideration of my Objection's economic feasibility and other rebuttals and counters. More important, as in my Objection #2 and elsewhere, I urge the County to ask if Rise is the "real party in interest" here, or whether they are acting for the real party with the necessary financial resources "behind the curtain." If, for example, Rise were "fronting" for someone else or planning to "flip the deal," that would also create CEQA objections to this DEIR. See the Guideline discussion of "Applicant" # 15351. Since Rise reports presently lacking the funding to accomplish this disputed DEIR plan (see my #2), it is reasonable to ask why or for whom they are investing in this disputed DEIR effort.

There are multiple reasons that I am so focused on economics that the DEIR resists disclosing, as did most of the other miners I've encountered whose mines are now among the more than 40,000 abandoned mines on the EPA list, since in my experience such economics end more mining adventures than any other cause. Another reason is that, regardless of what is required or not in the DEIR under CEQA, in one proper way or another economic evidence will, if necessary, dominate any locals' court challenges and politics and law reform efforts. What drives us locals living on the surface above and around the 2585-acre underground DEIR mine is

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the "reality" of what impacts us and creates our opportunities to counter the mine appropriately. Such reality includes what we know from the Rise SEC Form 10K and 10Q filings, such as that its reported working capital, credit, and resources are not sufficient to accomplish even the DEIR work, including essential mitigations and safety work described in the DEIR, much less what would be necessary in reality at the end of the approval process. See, eg, my Objection #'s 2, 3.N, and 4. Therefore, to keep that 2585-acre mine from becoming even worse in reality, us locals are entitled to use any and all flaws and deficiencies in the DEIR to defend ourselves. However, to match the DEIR's mistaken emphasis on local jobs the mine touts creating, please consider that one inevitable consequence of this DEIR mining is that the mine will cost more local residential and light commercial construction and remodeling work jobs than such alleged mining adds local jobs. Why? Because the building trades will suffer with us locals as the DEIR mine trashes our local property values and marketability, even from merely the stigmas from the DEIR threatened blasting, tunneling, rock removal, dewatering, and other mine work literally beneath us thousands living on the surface above or around that 2585-acre mine. Who wants to build or even remodel above or around an active mine? See my Objection at # 3.N and 4. Since the County must balance the pros and cons, it must consider the opposite of the economic case that the DEIR has tried to make for mining jobs, which is less construction jobs and, for us now poorer residents whose home values are suffering, less money in the local economy.

6. **A Quick Appeal For Consideration of Climate Change Realities Creating A "New Normal" Where Chronic Drier Weather And Drought Rebut The DEIR Illusions That Our Future Can Be Predicted From Our Past, Especially As To Groundwater.**

Ind 255-37

In my Objection at # 3.M and elsewhere I protested the fallacy in the climate change denying DEIR that our "new normal" environment for the next 80-years can be predicted from the past. However the CEQA debate on that subject is ultimately resolved, the disputed DEIR is not credible. (I do not mean the DEIR expressly denies climate change and drought; it just ignores such inconvenient truths and reality by exclusive focus instead on the irrelevant, and no longer predictive, past.) For example, the DEIR contends (and we locals dispute) that we can afford to suffer the loss of our precious groundwater for wasteful mine dewatering 24/7/365 for 80-years, because the average rain between 1967 and 2017 allegedly will be sufficient for such recharge and balancing for 80 more years. See my Objection # 3.M. No rational, informed person should believe that, much less bet their homes and personal way of life here above the 2585-acre underground mine on that illusion, regardless of what the DEIR incorrectly claims about the past. So, at the present time we have two irreconcilable views of our future reality, but, in this unique context, we locals also have an extra advantage against the DEIR, because we surface owners above and around the 2585-acre mine own our shares of that same groundwater that the mine seeks to waste in dewatering to send elsewhere down the Wolf Creek. Besides contesting the DEIR, we locals are already competing with hundreds of existing wells that are improperly ignored (like us locals above and around that underground mine) in the DEIR, and we can increase our competition with deeper old wells and more new wells to tap our own local groundwater beneath us. Nothing in the disputed

DEIR confronts or even mentions such competitions. See my Objection # 3.M and N, 4, and 14.

Also note the related fatal flaw in the disputed DEIR: it does not sufficiently address (as required by CEQA) the impact on our shared groundwater or other environmental issues of either (i) its old mine work in the existing mine flooded and closed since 1956, or (ii) the new, expanded, or deeper mining into the unknown condition areas in the 2585-acre underground mining area. Such changes in such underground conditions by mine work 24/7/365 for 80 years cannot be ignored because the DEIR considers such consequences to be "speculative." As surface owners we have the right to oppose this no benefit mine taking our groundwater for such a gamble into the unknown. Even if CEQA somehow allowed that, which we dispute, we are not limited to a CEQA contest to resist and compete against the DEIR mine, since we also have our own surface owner property rights to advance in other legal and political forums, where reality and the rules of evidence apply, including as to climate dryness and droughts. See my Objection # 3.M and N, 4, and 14.

Part of the reason the DEIR history-based illusions are doomed is that the law is catching up with climate change drier and drought realities, even though the legislation tends to be either general reforms regarding climate change or other applications. For example, CEQA Guideline # 15064.4(a) and (b) acknowledges climate change by requiring a project's greenhouse gas emissions See, eg, *Center for Biological Diversity v. Department of Fish & Wildlife* (2015), 62 Cal. 4th 204; California Health & Safety Code # 38500 et seq. As to the more general battle over climate issues and CEQA I defer to the other more expert objections that I incorporate by reference. The key factor, however, is that this disputed DEIR lacks credibility as to its refusal to confront reality by insisting on the past water results predicting our future as old normal for the next 80 years, instead of the much drier and worse future, thereby creating an alternative reality some call a "legal fiction" where climate change can be ignored. Fortunately, we have other means to defeat the DEIR on such groundwater issues besides CEQA, as well as to prevail on our second reason (besides climate change) in the CEQA dispute over groundwater recharge, because under these circumstances the disputed DEIR cannot ignore the risks of greater depletion on account of the unrevealed effects on groundwater supply and recharge of the DEIR's reopening mining and the new, deeper, and expanded mining in the 2585-acre underground mine, especially considering such surface owner existing and future well competition against the mine.

7. The DEIR's Other Suspicious Noncompliance With Specific CEQA Or CEQA Guideline Requirements Support My Objections To Errors, Omissions, And Deficiencies In the DEIR's Disputed Presentation.

Ind 255-38

A. What Is The Real CEQA "Project" And Its "Environmental Setting"?

Guideline # 15124 requires a "project description" with certain mandatory details that this Supplement and my Objections demonstrate in scores of instances to be omitted or erroneously or deficiently described in the disputed DEIR. For example, the activities at the "Brunswick Industrial Site" (plus 30 dry wells along East Bennett Road) and the "Centennial

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Industrial Site" are one integrated CEQA "project" that the DEIR improperly tries to split into what it incorrectly describes as two separate CEQA "projects." That **one integrated "project" also includes the disputed DEIR's most neglected, yet most environmentally dangerous part, the 2585-acre underground mine above and around which thousands of surface owing residents and voters live**. See also Cal Pub Resources Code # 21065, that defines "Project" as "**an activity** which may cause either a **direct change** in the environment, or a **reasonably foreseeable indirect physical change** in the environment ..." That makes the 2585-acre underground mine that is generally neglected and insufficiently addressed in the disputed DEIR the core of the "project," because that is where most of the direct (and reasonably foreseeable indirect) adverse impacts are happening, as addressed in my Objection and others. Accord Guideline #'s 15002(d) and 15378, which clarifies that the "project does not mean each separate government approval" in the process. See, eg, *Nelson v. County of Kern* (2010), 190 Cal. App. 4th 252 (mining and reclamation work were parts of a single project); *River Watch v. Olivenham Municipal Water District* (2009), 170 Cal. App. 4th 186 (the Water District water trucks loading and unloading activities at the landfill are part of the landfill project that needed CEQA approval). Note, however, that even separate projects can have cumulative effects, as explained in Guideline # 15355.

Guideline # 15124(a) requires a "precise location and boundaries of the proposed project" "on a detailed map," but, as my Objection repeatedly demonstrated, none of us thousands of surface owners above or around the 2585-acre underground mine know what is happening underneath us, because we lack any meaningful data, even a street map locator. (The dotted lines on the disputed DEIR map are meaningless, because it's an aerial view obscured by our forest trees that shows no surface location clues. While still deficient, the current Rise SEC Form 10K addressed in my Objection # 2 contains a better description of that underground mine and the mining than does the disputed DEIR, all of which is intolerable as well as noncompliant, since us most impacted surface neighbors at the core of the project above and around that 2585-acre mine still have no satisfactory idea where we are in relation to all this 24/7/365 blasting, tunneling, Cr+6 hexavalent cement shoring, dewatering, and other mining work that is not only an environmental threat, but also may conflict with our surface owner and groundwater property rights.

Ind 255-39 **Guideline # 15124(b) requires a particular type of "statement of objectives," which the disputed DEIR fails to do properly, as explained in my Objection, especially as to the 2585-acre underground mining beneath us thousands of surface residents and voters, all of whom are asking the same kinds of questions (see, eg, my Objection # 15) that are never satisfactorily addressed in the disputed DEIR.**

Ind 255-40 **Guideline # 15124(c) requires a general description of the project's technical, ECONOMIC, and environmental characteristics" (emphasis added),** but again the disputed DEIR fails to do so, as demonstrated in my Objection (eg, #'s 2, 3, and 4), especially with respect to the core disputes regarding the 2585-acre underground mine and with respect to "economics" (which the DEIR never addressed at all).

Ind 255-41 **Likewise, Guidelines #15124(d) and (d)(2)** require more things that the disputed DEIR fails to do properly or at all in various respects addressed in my Objection, although since much information appears to be missing or deficiently stated, it is hard for us to be precise about what is known only to the DEIR advocates. However, to illustrate the point, since the

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DEIR entirely ignores the hexavalent chromium threats to us locals, it's hard for us to know with what agencies the DEIR should be consulting or what permits they should be seeking. The same is true with groundwater depletion and related problems deficiently addressed in the DEIR, although I would like to know what the DEIR applicant's dealing with NID may be. This data is important, so we know to whom else we should be complaining about specific objections. In any event, the many public agencies likely making decisions on the project will be making more than one, and those must be disclosed pursuant to # 15124(d)(2).

Ind 255-42

Guideline # 15125(a) requires a "description of the physical environmental conditions in the vicinity of the project," such as to set a "baseline" and "to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." See also # 15125(c), where the Guidelines state: "Knowledge of the regional stetting is critical to the assessment of environmental impacts ... [with] special emphasis ... on environmental resources that are rate or unique to that region and would be affected by that project." The disputed DEIR is a miserable failure at that for scores of specifically demonstrated reasons in my Objection, especially because the DEIR ignores the thousands of us on the surface above and around the 2585-acre underground mine as part of that "vicinity" and "region." To pick one, in contrast to the details (still insufficient) about the surface Brunswick Industrial Site, the 30 wells along East Bennett Road, and the Centennial Industrial Site, there no meaningful disclosure about the surface areas where thousands of us live above or around the 2585-acre mine. That omission is among the more damning reasons for rejecting this DEIR, besides the DEIR obscuring both the hexavalent chromium threat and the massive depletion of our groundwater (as to which each of us neglected surface owners above and around the 2585-acre mine have equivalent or better property rights never mentioned at all in the DEIR).

Ind 255-43

Guideline # 15125(a)(1) and (2) are unfortunate in this particular project context, because they are designed to keep project advocates from imagining a hypothetical future which is their unrealistic fantasy to justify their environmental impacts. But here we have the reverse, because this disputed DEIR is about reopening a closed and flooded mine since 1956 about which the historical data in many cases is deficient, missing, or misleading (eg, consider how science and knowledge has changed since 1956, making most such data unreliable and often irrelevant for predicting the future; eg, back then asbestos was considered a good thing). [The Guidelines fortunately are not law, and so, when what was designed for traditional subdivision projects is counterproductive in such exploitive mining context, we can insist of truth and common sense, rather than blindly following guidelines if they make no sense in our context. Stated another way, as read by this DEIR, such Guidelines would be contrary to the CEQA statutes and invalid for this purpose as a disputed excuse for the DEIR to create a false, alternative reality from the past that defeats the purpose of CEQA to confront the future with scientific truth and reality, like climate change's new normal of dryness and drought.] That DEIR lack of accuracy about using such past to predict the future is especially dangerous as to mining issues such as water depletion, illusory recharge, and climate changes, as demonstrated in my Objection (eg, 3.M) and my discussion of climate change here. This is where *Gray* and its "common sense come in." Consider that the DEIR basically offers no data about what the conditions exist now in the flooded 2585-acre underground mine beneath thousands of us surface residents above and around the mine, and

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the DEIR offers no reliable or sufficient data about what that more problems mining will create as it blasts, tunnels, removes rock, and adds Cr+6 toxins in the shoring cement paste, dewaters, and otherwise mines in new, expanded, and deeper areas. In effect, the old and new mining is about the unknown, and the DEIR essential asks that the miner be allowed to engage in all those dangerous activities blindly, with no idea of the environmental consequences now or even worse in the future. In effect, that would transfer all such mining caused environmental and other risks to those of us living on the surface above or around the 2585-acre mine and elsewhere. That is the opposite of what CEQA was intended to accomplish.

Ind 255-44

Fortunately, that DEIR misuse of # 15125(a)(1) and (2) can be partly moderated by enforcement of #15125(a)(3), which states: "An existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the base line." Because of the mine being closed and flooded since 1956, as demonstrated throughout my Objection, almost everything about the 2585-acre underground mine is "hypothetical" and speculative in the DEIR, as is admitted in many cases in the DEIR itself or in the current or past Rise SEC Forms 10K or 10Q filings on its website analyzed in my Objection at # 2. So, there is no tolerable base line as required, because there was no investigation for the DEIR. For example, the disputed mine admits that it plans to mine into new, expanded, and deeper places in the 2585-acre underground mine as to which it has no information and no base line, in effect transferring the risk of the unknown onto us locals, giving the DEIR mining a "blank check" as to whatever the impact of that unpredictable activity may be on the concerns expressed in my Objection as others, such as risks as to (i) whatever worse or new toxic materials may be removed from those new areas and dumped or dewatered on the surface (eg, new hazardous materials? Or more intense ones, like worse levels of asbestos, arsenic, etc?), (ii) new underground water depletion or recharge problems being created by such blind new blasting, tunneling, dewatering, or mining, or (iii) any other nuisances or problems described in my Objection (such as at # 4 "subsidence" from loss of subjacent or lateral support harming us locals owning the surface above and around the 2585-acre mine). See also my Objection #'s 3.N, 4, and 14.

Ind 255-45

For example, because the DEIR entirely ignores the competing surface ownership rights of us locals above or around the 2585-acre underground mine neglected in the DEIR, consider again the leading such Supreme Court decision of *Keystone Bituminous Coal Ass'n* v. *DeBeneditis*, 480 U.S. 470 (1987), where the Court upheld against a coal miner challenge the Bituminous Subsidence And Land Preservation Act (aka the Subsidence Act, as it's called in Pennsylvania and many places where it has been replicated), where mining was limited to prevent "subsidence" (the loss of surface lateral and subjacent support and loss of groundwater or depletion of surface water. Those are legal rights we surface residents already have here, but it helps to have more laws to detail specific applications and thereby avoiding the need for expensive defense litigation, as discussed in my Objection # 3.N). That Supreme Court decision defined the "subsidence" concerns (also equally at issue for this DEIR project, especially because of the massive and objectionable groundwater depletion and [even what little is so far revealed of] the DEIR's new, deeper, and expanded DEIR blasting, tunneling, rock removal, dewatering, and other mining activities) as follows (at 474-5):

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> Coal mine subsidence is the lowering of the strata overlying a coal mine, including the land surface, caused by extraction of underground coal. This lowering of the strata can have devastating effects. It often causes substantial damage to foundations, walls, and other structural members, and the integrity of houses and buildings. Subsidence frequently causes sinkholes or troughs in land which make the land difficult or impossible to develop. Its effect on farming has been well documented—many subsided areas cannot be plowed or properly prepared. **Subsidence can also cause the loss of groundwater and surface ponds.** In short, it presents the type of environmental concern that has been the focus of so much federal, state, and local regulation in recent decades. (Emphasis added). [That conclusion about groundwater has a fn 2 which states:]
>
> Fn2. "Whenever [subsidence effects] extend, damage can occur to buildings, roads, pipelines, cables, streams, water impoundments, wells, and aquifers. Buildings can be cracked or titled; roads can be lowered or cracked, **streams, water impoundments, and aquifers can all be drained into the underground excavations**. Oil and gas wells can be severed, causing contents to migrate into underground mines into aquifers, and even into residential basements. Sewage lines, gas lines, and water lines can all be severed, as can telephone and electric cables. ... (emphasis added).

While that subsidence law generally required 50% of the coal to remain for support in strategic places, it did many other things to protect the surface and limit the mining. That decision explained that the government was entitled to so act "to protect the public interest in health, the environment, and the fiscal integrity of the area," such as by "exercising its police powers to abate activity akin to a public nuisance," although the court made clear that the police power was broader than nuisances. (At 488) [As to see mining "nuisances" from which the DEIR cannot save this mine, reread California Civil Code # 3480, Penal Code #372 and 372a, and NRS 202.470. Also see my Objection # 3.N, recognizing that us local voters could exercise our rights to provide greater and more specific defenses against mining nuisances, as well as, considering the DEIR's understated asbestos threats and ignored hexavalent chromium issues, see *People v. ConAgra Grocery Products Co.* (2017), 17 Cal. App. 5th 51, where a maker of lead paint promoted and sold it as a nuisance.]

Of special note, the Supreme Court (at 493-94) noted that this challenge was to the enactment of the law before it was enforced, and that meant that it was premature to complain about how the law might be abused, when the facts of that surface and underground mining competition of rights were not yet established. Citing its own precedent in Hodel v. Virginia Surface Mining & Reclamation Ass'n Inc, 452 U.S, 264 (1981), the Court explained:

> "[The] court ignored this Court's oft-repeated admonition that the constitutionality of statutes ought not be decided except in an actual factual setting that makes such a decision necessary. [citations omitted] Adherence to this rule is particularly important in cases raising allegations of an unconstitutional taking of private property. *** (at 497): [W]here an owner possesses a full 'bundle' of property rights, the destruction of one 'strand' is not a taking because the aggregate must be viewed in its entirety. [The Court

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then followed that discussion how valid zoning laws always affect without any "taking" property uses with things like setbacks, lot size vs building size, etc.]

Finally, # 15125(d) states that: "The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans ... [such as for] air quality attainment maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, ... [and many others]." My Objection and others identify many such inconsistencies, but such objections cannot be complete, because of the other omissions, errors, and deficiencies about which we complain in our objections. For example, since, as described above and in my Objection and others, the new, expanded, and deeper mining results are not revealed in the disputed DEIR, we locals cannot be blamed for not detailing the resulting DEIR inconsistencies, or even those that now exist, but are not revealed in the DEIR, which has disclosed no sufficient current information on the state of the existing underground mine that has been closed and flooded since 1956.

Ind 255-46

B. Who Is The "Applicant" Versus The "Real Party In Interest"?

Guideline # 15351 defined "Applicant" as the "person who proposes to carry out a project which needs a lease, permit, license, certificate, or other entitlement for use or financial assistance from one or more public agencies when that person applies for the governmental approval or assistance." As in court litigation filings and many such governmental entitlements, the "real party in interest" is supposed to be the applicant or at least be disclosed. As my Objection asks (see my # 2's and 15), is Rise only an agent, "front," or a "flipper" for an "undisclosed principal" or someone else "behind the curtain?" If so, that reality should be disclosed in the disputed DEIR. My Objection (at # 2) demonstrates why that is a reasonable question, since the current Rise SEC Form 10K and 10Q report insufficient working capital, credit, or resources to accomplish what is stated in the DEIR to be done, even the long initial startup work to dewater the mine and begin preparations for operating, much less the many more months required thereafter of subsequent work before gold revenue (if any) is available to pay the mine's bills, since Rise admits in such 10K that there are no "proven reserves" and that the profitable gold volume is speculative. That reality is what inspires common local questions about whether this DEIR is part of some undisclosed arrangement or plan to flip or otherwise arrange some change in control transaction, such as a profit-sharing lease, a loan to own control arrangement, or other creative partnership deal with someone even less likely directly to obtain approval of the DEIR with appropriate disclosure as the Applicant.

Ind 255-47

While, as described in my Objection (at # 1), I have no personal knowledge about Rise that is not in the public records I cite, the circumstances are puzzling. In any event, as a bankruptcy lawyer with extensive relevant experience (see my Objection # 1) I have been involved in hundreds of distressed asset sales and other such creative distress transactions, and it is customary that the seller does extensive due diligence regarding the creditworthiness and character of the bidder. As the *Gray*, *Sierra Club*, and other cases discussed above demonstrate in requiring "good faith," the starting point of such "good faith" is to be sure the "applicant" is the real party in interest who is financial and otherwise

capable of performing the DEIR. Otherwise, approving the DEIR may be merely giving away an "option" for such an agent to flip the deal or otherwise act for someone else "behind the curtain."

8. Miscellaneous Noncompliance With the CEQA Guidelines That Further Evidence A Pattern And Practice Of DEIR's Comprehensive Obscurity Contrary To The *Sierra Club* And Other Standards For Required Information.

A. Introduction To Objectionable Techniques To Set Up False Assumptions And Conclusions Or Otherwise Evade Disclosure Obligations

Ind 255-48

My Objection and specific examples above both demonstrate scores of times when explicitly or implicitly the disputed DEIR abused "speculation" as an alleged excuse for dodging the *Sierra Club*'s general requirements CEQA data and information and for evading inconvenient truths. I object whether that is a coincidence or a tactic to enable the DEIR incorrectly to "assume" away problems or to leap to unsubstantiated conclusions by treating its incorrect positions as if they were beyond contest, when they were the opposite and fatal flaws for which the DEIR had no answers. The following are lesser examples of Guideline noncompliance that, by themselves seem minor, but which in that context of massive such specifically debated DEIR errors, omissions, and deficiencies reveal more evidence of both a comprehensive, prohibited "pattern and practice" and evidence for "objectionable techniques" or worse. As I complain about throughout this Supplement and my Objection, the DEIR's words like "assumption" and "conclusion" are often a way of announcing an objectionable statement that itself is disputed opinion, speculation, or worse in the DEIR. In a trial such evidence would be impeached by using contrary miner or DEIR admissions, inconsistencies, or other rebuttal evidence, as well as by objecting to a sufficient "lack of foundation" under the Rules of Evidence. (That "lack of foundation" for disputed opinions or worse by the DEIR is especially troubling when the DEIR pretends that it is offering "expert opinions," when there is no qualified expert available to cross-examine, and no specifics or sufficient cross-references to any expert study or report that is relevant and applicable to these facts and circumstances as to this specific "project.")

B. "Hide The Ball" Noncompliance, Such As By Burying Data Where It Is Less Likely To Be Seen Or Understood In Context, Often May Be Revealed By Less Serious Types Of Noncompliance With the Guidelines.

Guideline #15122 requires a table of contents or index "to assist readers in finding the analysis of different subjects and issues," which means that the failure to include information where it should be identified is noncompliance and well as an objectionable tactic. See also my discussion of the DEIR's noncompliance with **Guideline # 15120(a) and (b), requiring the DEIR to "state where in the document each element is discussed" and or "at a minimum a table showing where each of the subjects is discussed."** In my Objection to this tactic (eg, at # 3.E) the classic example is the failure of the DEIR to address the toxic hexavalent chromium (Cr+6)

threat in its "Hazards And Hazardous Materials" section at # 4.7, but rather instead in only a few other places where it is mentioned in passing, as if there were no issue with including Cr+6 in the cement paste for shoring up the 2585-acre underground mine beneath thousands of suburban residents and voters living on the surface above and around that mine. (Many times, the DEIR did not even use the words hexavalent chromium or Cr+6, when discussing that cement paste.). See, eg, my Objection #'s 3.C, G, H, and 7. There are many other examples, especially regarding disputed DEIR water problems and the core issues in dispute regarding the 2585-acre mine, which is better described (although still deficiently) in in the current Rise 10K than in the DEIR. See, eg, my Objection #'s 3.A, B, D, and M, 4, 5, and 8.

Ind 255-49

Guideline # 15123 requires a summary "of the proposed actions and its consequences" (at (a)), with "each significant effect with proposed mitigation measures and alternatives" (at (b)(1)), with "areas of controversy known to the lead agency, including issues raised by agencies and the public" (at (b)(2)), and with "issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects (at (b)(3)). The same problems and objections apply to this with even greater force and in more instances than addressed here. But, without repeating the top 50 examples in my Objection, my complaints in the prior paragraph about the table of contents and hiding the ball problems apply even more strongly here, since the summary is supposed to a better "finder" tool. However, the DEIR fails miserably as a guide to find what matters. See my Objection # 15, listing unanswered questions, where, when confronting errors, omissions, and deficiencies in one topic place, you later find some (but less than required) of what you want to know somewhere else in the process of looking for something else.

9. **Concluding Remarks.**

Ind 255-50

As explained in my Objection # 1.D, at the public hearing on March 24, 2022, the County representative began by excluding all consideration of evidence and argument regarding the financial condition and character of the DEIR miner and the financial feasibility of accomplishing key safety and mitigation results assumed in the disputed DEIR, contrary to this and other objections. Since the County had not yet heard any arguments why that position is incorrect under these particular facts and circumstances, I ask the lead CEQA Agency to reconsider for reasons stated above. I also urge the County to expand that economic study as well for such objections by me and others.

Thank you for considering my views.

Sincerely,

// Larry Engel

G. Larry Engel

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INDIVIDUAL LETTER 255: G. LARRY ENGEL

Response to Comment Ind 255-1
The commenter provides a Table of Contents for the Comment Letter. The comment is noted.

Response to Comment Ind 255-2
This comment is introductory in nature. The commenter explains that this comment letter will focus primarily on legal arguments for why the DEIR is inadequate pursuant to CEQA. The comment is noted. The commenter also references their previous letter. Please see responses to Individual Letter 254.

Response to Comment Ind 255-3
The commenter restates CEQA Guideline section 15151 which sets the standard for adequacy of an environmental impact report ("EIR"). The commenter states that the DEIR violates Section 15151 due to inadequate discussion of hexavalent chromium. The commenter also states that Individual Comment Letter 254 details over 50 "errors, omissions, and deficiencies" that violate Section 15151. Regarding the presence of hexavalent chromium in the Cement Paste Backfill ("CPB") to be used in the project, the commenter is referred to Response to Comment Ind 254-1. Each asserted inadequacy raised by the commenter in Commenter 255-1 is addressed in Response to Comment Ind 254-1. Please see Response to Comment Ind 254-1.

Response to Comment Ind 255-4
The commenter references CEQA Guidelines section 15364 which defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (Cal. Code Regs., tit. 14, § 15364.) The commenter construes the term "economic" to mean that the project must be feasible based on the commenter's perceived financial condition of the Project Applicant. There are no CEQA authorities to support this interpretation of Section 15364. Feasibility, within Section 15364, refers to the feasibility of project alternatives or mitigation measures. CEQA review is limited to a project's impacts to the physical environment and the DEIR is not required to analyze the financial condition of the Project Applicant.

Response to Comment Ind 255-5
The commenter references CEQA Guidelines section 15144 which states that "[d]rafting an EIR or preparing a negative declaration necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." (Cal. Code Regs., tit. 14, § 15144.) The commenter states that the DEIR made no effort to forecast the condition of the underground mine workings, the rate of recharge to groundwater supplies, the presence of hexavalent chromium in the CPB, or the future conditions associated with climate change. The commenter also raised various assertions submitted in their Individual Commenter Letter 254. However, the commenter does not explain how the DEIR is inadequate and relies on conclusory statements. Regarding the hydrological condition of the mine workings, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model. Regarding groundwater recharge, the DEIR analyzed the project's potential to interfere with recharge and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) As also discussed in Response to Comment Ind 254-87, while the groundwater model relied on a 25-year hydrogeologic model to assess groundwater impacts from project implementation, based on known locations of mineralized gold ore and represents the underground location of where mining would occur during the first 25 years of mine operation, the

modeling also considered longer-term mining. Sensitivity Scenario 6 used in the groundwater model considered the significant expansion of mining in areas with potential for mineralization, as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. This groundwater model scenario represents the reasonably foreseeable location of where future mining would likely take place after the initial 25-year period. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks.

The commenter is referred to Response to Comment Ind 254-1 for a discussion about hexavalent chromium. Regarding climate change, the commenter is referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 255-6

The commenter reiterates the same concerns identified in Comment Ind 255-5 including groundwater recharge, hexavalent chromium, and climate change. The commenter is referred to responses in Response to Comment Ind 255-5. The commenter references the DEIR's "Non-CEQA Related Analysis" section on DEIR pages 4.3-103–104. The commenter states that the DEIR does not adequately forecast potential impacts and mislabels certain impacts as too speculative to be determined. As an example, the commenter states that any reasonable person would determine recharge of groundwater within the entire mineral rights boundary will not be possible following the dewatering of the mine. However, the commenter does not specifically identify how the DEIR's discussion of groundwater recharge in Impact 4.8-2 (DEIR, p. 4.8-54) or the Groundwater Model Report (DEIR, Appendix K.3) is inadequate.

As discussed in Appendix K.2 to the DEIR (page 19), the primary source of recharge is percolation of local rainfall into the fractured bedrock. In addition, as described in Section 3.3.2 of Appendix K.2, the amount of recharge each year also appears to be relatively constant since almost all of the wells maintain a consistent magnitude of seasonal fluctuation from year to year and there are no long-term trends observed in most of the wells that can be correlated to variations in annual water-year rainfall.

Response to Comment Ind 255-7

The commenter states that the DEIR violates certain CEQA provisions but does not specifically state how the DEIR violates these provisions. The commenter also states that the DEIR makes no effort to address the "unknowns" throughout the mineral rights boundary. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model. The commenter is also referred to Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 255-8

The commenter references CEQA Guidelines sections 15122 through 15131, which establish the required contents of the Environmental Impact Report. The commenter generally asserts that Individual Letter 254 shows that the DEIR violates these CEQA provisions. Please see responses to Individual Letter 254.

Response to Comment Ind 255-9

The commenter references CEQA Guidelines Section 15148, which requires that an EIR cite to "all documents used in its preparation including, where possible, the page and section number of any technical reports which were used as the basis for any statements in the EIR." The commenter states that the DEIR violates Section 15148. California courts have not construed Section 15148 so rigidly. CEQA requires an EIR to reflect a good faith effort at full disclosure; *it does not mandate perfection ….*" (*El Moro Community Assn. v. California Dept. of Parks & Recreation* (2004) 122 Cal.App.4th 1341, 1354 (emphasis in original) (upholding an EIR even though technical reports were only referenced by general subject matter and did not contain specific citations.) The DEIR identifies the name of each technical document relied upon and its corresponding appendix identifier in the Table of Contents (DEIR, p. iv–vi.) The County also made available all of the appendices listed in the DEIR to the public. The DEIR does not violate Section 15148.

Response to Comment Ind 255-10

The commenter references CEQA Guidelines Section 15150, which establishes how an EIR may incorporate by reference another document. Section 15150 provides that where a document is incorporated by reference, the portion incorporated must be briefly summarized and the document must be made available to the public. The commenter states that the DEIR violates Section 15150 by incorporating by reference documents that are inapplicable or irrelevant and that documents incorporated are inadequately summarized. However, the comment lacks specificity as it does not identify which documents incorporated by reference are inadequate.

Response to Comment Ind 255-11

The commenter references CEQA Guidelines Section 15143, which requires the DEIR to discuss significant effects "with emphasis in proportion to their severity and probability of occurrence." The commenter asserts that the DEIR "barely" mentions hexavalent chromium and never discusses its risks with any "emphasis." The commenter asserts that groundwater depletion never receives proper "emphasis", and the full extent of the mineral rights boundary receives insufficient "emphasis". The DEIR discusses hexavalent chromium on page 4.8-47–48; the commenter is also referred to Response to Comment Ind 254-1. The DEIR analyzed the project's impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) Regarding the conditions of the underground mine workings, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model. Regarding future mining areas within the mineral rights boundary, please see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 255-12

The commenter references CEQA Guidelines Section 15154, which requires that a lead agency preparing an EIR shall utilize the Airport Land Use Planning Handbook published by Caltrans' Division of Aeronautics to assess whether the proposed project results in a safety hazard or noise problem for persons using the airport or persons residing or working in the project area. The commenter states that the DEIR violates Section 15154 due to a nearby airport.

The DEIR states that the Nevada County Air Park is less than one mile away from the Project Site. (DEIR, p. 4.7-36.) "The [Project Site] is partially within Zones D and E of the Nevada County Airport Land Use Compatibility Plan (NCALUCP). For Zone D, airspace review is required for objects at elevations above 3,207 feet mean sea level (msl). The tallest point of the project site (the proposed 165-foot-tall headframe building) would be at 2,912 feet msl. In addition, the project is not a noise-sensitive use, would not pose a hazard to flight, and would not exceed the density

requirements; therefore, the project would comply with the requirements of the NCALUCP for Zones D and E.

Nevertheless, the proposed project would be required to be reviewed by the ALUC because it would have a building floor area of 20,000 square feet or greater, would include more than 100 people on-site, and would include new development of buildings more than 100 feet tall in Zones D and E. The purpose of the ALUC review would be to review the proposed project for consistency with the compatibility criteria in the NCALUCP, and not for the purpose of identifying potential environmental effects.

Based on the above, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area related to the Nevada County Air Park. Therefore, impacts related to airport safety hazards and noise would be less than significant." (DEIR, p. 4.7-36.)

In addition, Master Response 7 - Location of Future Mining Areas, and the attendant figures, show that underground mining would not occur beneath the airport.

Response to Comment 57-13

The commenter references CEQA Guidelines section 15142, which requires that an EIR be prepared using an interdisciplinary approach. The commenter states that Section 15142 "should also be applied to objectors for a 'level playing field,' to allow such interdisciplinary objections to have equivalent impact as the DEIR advocates." This comment does not address the adequacy of the DEIR and is somewhat unclear. Please see Master Response 1.

Response to Comment Ind 255-14

The commenter states that the DEIR erroneously dismissed from consideration a No Project (Alternative Use). Specifically, if the project were not approved, the Project Site could be used for an industrial use. Development of the Brunswick Industrial Site with industrial uses, consistent with the current M1-SP zoning, could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project. (DEIR, p. 6-13.) This would be contrary to CEQA's objectives for an alternative, which is to avoid or substantially lessen any of the significant effects of the project (Section 15126.6(f).) Therefore, the DEIR dismissed this alternative from further consideration. (Id.) The commenter does not state how the DEIR is inadequate in dismissing this Alternative from further consideration. Please see Response to Comment Ind 388-6.

Response to Comment Ind 255-15

The commenter provides the factual background and holding from *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 ("*Sierra Club*".) The commenter states that the DEIR violates the holding of *Sierra Club* but does not explain how. The commenter references hexavalent chromium and new underground mining and asserts that the DEIR does not assess the condition of the underground workings. Regarding hexavalent chromium, the commenter to Response to Comment Ind 254-1. Regarding the condition of the mine, the commenter is referred to Master Response 7 – Location of Future Mining Areas and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 255-16

The commenter quotes a number of passages from *Sierra Club* and states that the DEIR should be dismissed as a matter of law but provides no additional information. The comment is noted.

Response to Comment Ind 255-17

The commenter quotes from *Sierra Club* for the notion that a reviewing court looks not for an exhaustive analysis but for adequacy, completeness, and a good-faith effort at full disclosure. The commenter states that the DEIR for the project fails at all three but does not provide any specific information on which to formulate a response.

Response to Comment Ind 255-18

The commenter lists several CEQA cases and states that the holdings of the cases indicate that the DEIR is inadequate but provides no additional information. The commenter also references the Project Applicant's SEC filings which are not relevant to the DEIR. Regarding hexavalent chromium, please see Response to Comment Ind 254-1.

Response to Comment Ind 255-19

The commenter references the CEQA case of *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099 and quotes the legal standard of review. The commenter states that the DEIR would fail under this standard of review because the DEIR did not discuss hexavalent chromium in Chapter 4.7 (Hazards and Hazardous Materials) and states that the DEIR lacks adequate data and underestimates the number of private groundwater wells impacted by the project. The presence of hexavalent chromium in the CPB presents a potential impact to water within the underground mine workings. Accordingly, the DEIR appropriately discussed hexavalent chromium in Chapter4.8 (Hydrology and Water Quality). (DEIR. p. 4.8-47–49.) The commenter is also referred to Response to Comment Ind 254-1. Regarding groundwater, the DEIR assessed the project's impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) Regarding the adequacy of groundwater data, the commenter is referred to Master Response 14 – Adequacy of Groundwater Model. Regarding mining within the mineral rights area, please see Master Response 7 – Location of Future Mining Areas, and Response to Comment Ind 254-17.

Response to Comment Ind 255-20

The commenter compares the facts of *Gray v. County of Madera* to the current project and asserts that, unlike *Gray*, the groundwater monitoring for the project is inadequate. The commenter is referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding analysis of deeper and expanded mining in the mineral rights boundary, please see Master Response 7 – Location of Future Mining Areas, and Response to Comment Ind 254-17.

Response to Comment Ind 255-21

The commenter cites to *Gray v. County of Madera* where the Court rejected the lead agency's mitigation measures regarding the impact of a proposed quarry to nearby groundwater wells. The facts of *Gray* are not relevant to the adequacy of the DEIR for the project. However, it should be noted that the lead agency in *Gray* proposed to replace potable water with non-potable water which, could expose landowners to new regulatory oversight, would a create an unreliable water system, and may create new and potentially significant impacts to the environment. Here, the DEIR's Mitigation Measure 4.8-2(a) proposes to implement a Groundwater Monitoring Plan 12 months prior to the dewatering of the mine. (DEIR, p. 4.8-67.) Additionally, Mitigation Measure 4.8-2(c) would connect 30 properties along East Bennett Road to NID service which would provide potable and reliable water. (DEIR, p. 4.8-68.) Lastly, Mitigation Measure 4.8-2(b) requires the Project Applicant to supply a comparable water supply to any property impacted by mining operations. (DEIR, p. 4.8-68.) The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.



Response to Comment Ind 255-22

The commenter states that the project's mitigation measures regarding groundwater do not satisfy CEQA and are not feasible or affordable by the Project Applicant. However, the commenter does not specifically state why the DEIR's mitigation measures are inadequate. The commenter also states that the facts of *Gray* are different from the facts of the project because the project features more overlying property owners that depend on groundwater. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of the Groundwater Monitoring Wells.

Response to Comment Ind 255-23

The commenter references a rejected groundwater mitigation measure from *Gray* which involved the Project Applicant providing bottled water to residents whose groundwater wells were impacted by that project. The commenter compares the mitigation measure in *Gray* to a "water truck alternative" in the DEIR. It is unclear what the commenter is referring to in regard to the "water truck alternative." The proposed mitigation measures for impacts to groundwater can be found at DEIR pages 4.8-67–68.

Response to Comment Ind 255-24

The commenter quotes language from *Gray* in which the court found that the project's mitigation measures relating to groundwater were not supported by substantial evidence in the record. The commenter states that the project's groundwater related mitigation measures also are not supported by substantial evidence because those mitigation measures are inadequate. However, the commenter does not explain why the DEIR's proposed groundwater mitigation measures are inadequate or provide additional information on which to formulate a response. The groundwater mitigation measures in Chapter 4.8 of the DEIR reflect input from the County's third-party hydrology consultant for the project, West Yost, who deemed the measures adequate to mitigate the project's impacts to a less than significant level. Please also see Master Response 15.

Response to Comment Ind 255-25

The commenter points to language in *Gray* where the court found that mitigation measures relating to traffic impacts were inadequate because the record did not indicate any definite commitment on the part of the Project Applicant as to when traffic improvements would take place. The commenter asserts that the DEIR's traffic related mitigation measures suffer from the same flaw. The lead agency in *Gray* relied on two letters from Caltrans, stating that while Caltrans had not identified any specific plan for traffic improvements, there was a clear methodology for collecting fees from the quarry project and there was sufficient commitment to completing the traffic improvements. (*Gray v. County of Madera* (2008) 167 Cal.App.4th, 1099, 1122.) The court disagreed, stating that the Caltrans letters showed intent but no definite commitment to make traffic improvements.

Here, the DEIR requires the Project Applicant to, "[p]rior to commencement of engineered fill hauling, . . . enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between project driveway and Brunswick Road. (DEIR, p. 4.12-91.) Unlike *Gray*, Mitigation Measure 4.12-6(b) indicates a clear commitment, and enforceable requirements within the DEIR, that the Project Applicant enter into road maintenance agreements. Moreover, the project's DEIR found certain traffic impacts to be significant and unavoidable due to the

uncertainty of implementation, which is distinguishable from the situation in *Gray v. County of Madera.*

Response to Comment Ind 255-26

The commenter points to language in *Gray* where the court found the project's noise related mitigation measures inadequate because the mitigation measures did not account for existing noise levels and whether project-related noise would cumulatively exceed regulatory thresholds. The commenter states that this holding in *Gray* exposes similar flaws in the DEIR. However, the commenter does not offer any additional information as to why the DEIR is similarly inadequate. The DEIR examined "existing ambient noise levels and the anticipated existing plus-project traffic noise levels at the nearest residences to each roadway segment, as well as the project-related increase in traffic noise levels and the impact assessment threshold for each roadway segment…" (DEIR, p. 4.10-35.) "As shown in the [Table 4.10-5], the traffic noise level increases from the transport of fill from the Brunswick Industrial Site to the Centennial Industrial Site and employee trips would not exceed the applicable thresholds of significance at any of the receptors." (DEIR, p. 4.10-35.) While the DEIR acknowledges that the use of "jake brakes" by project trucks could lead to significant noise impacts, Mitigation Measure 4.10-2 requires truck operators to operate their trucks in such a manner as to not require the use of jake brakes. (DEIR, p. 4.10-37.)

Response to Comment Ind 255-27

The commenter states that the DEIR does not adequately assess "cumulative impacts." The CEQA Guidelines define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (Cal. Code Regs., tit. 14, §15355.) The individual effects may be changes resulting from a single project or more than one project. (Cal. Code Regs., tit. 14, §15355(a).) Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. (Cal. Code Regs., tit. 14, §15355(b).) Cumulative impacts were assessed in each resource section of the DEIR as appropriate, and in Section 5.3 of the DEIR. The commenter offers no additional information as to how the DEIR's analysis of cumulative impacts is inadequate; thus, no further response is possible. Please also see Response to Comment Ind 254-83.

Response to Comment Ind 255-28

The commenter states that the DEIR failed to prepare an adequate Water Supply Assessment ("WSA") as required by SB 610. However, the commenter does not explain how the WSA prepared for the project is inadequate but appears to suggest that the DEIR underestimate well impacts, and thus, the number of homes that will need to be provided with potable water. Regarding the adequacy of the groundwater model and groundwater monitoring wells, please see Master Responses 14 and 15, respectively. Note also that water supply is discussed in DEIR Chapter 4.11 (Public Services and Utilities) at pages 4.11-8–11. The commenter is also referred to the WSA itself, prepared by West Yost (Appendix N, *Idaho-Maryland Mine Water Supply Assessment*. December 1, 2021.)

Response to Comment Ind 255-29

The commenter states that the economic feasibility of a project under CEQA should be assessed similar to other components typically addressed within an EIR (e.g., air quality, traffic, biological resources, etc.). The commenter also states that the economic impacts (i.e., property values) of the project must be considered in the DEIR. The commenter points to various CEQA authorities, such as Public Resources Code section 21061.2 and CEQA Guideline sections 15064 and

15131(a). The commenter also points to CEQA Guideline section 15131(b), which states that "[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by the project."

Regarding the financial condition of the Project Applicant, there are no CEQA authorities that require an analysis of a Project Applicant's financial condition as part of an EIR.

Regarding economic impacts, the commenter states that any negative impacts to property values as a result of the dewatering of the Idaho-Maryland Mine are the type of impacts recognized by Section 15131(b). The commenter misconstrues Section 15131(b). Economic impacts may be used to determine the extent of a physical impact caused by the project. Losses in property values are purely economic impacts, and the commenter does not explain how negative impacts to property values could be used to determine the extent of a physical impact to the environment. Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 255-30

The commenter asserts that the project's potential impacts to property values fall within the scope of Section 15131(b). The commenter argues that the possibility of diminished economic value will motivate property owners to extract more groundwater or drill deeper wells, thus depleting groundwater supplies. The commenter essentially argues that the economic threat of diminished property values will prompt a social response to compete for groundwater which will cause a significant impact. However, the commenter confuses cause and effect. Here, the economic or social effect would not determine the significance of the physical changes caused by the project (i.e., the impact to groundwater wells caused by the dewatering of the mine). Moreover, the assertion that the project would result in property owners competing for, and eventually depleting, groundwater supplies is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 255-31

This comment is a continuation of Comment Ind 255-30. The commenter is referred to Response to Comment Ind 255-30.

Response to Comment Ind 255-32

The commenter states that the DEIR's discussion of the "Reduced Hours" alternative on DEIR page 6-13–14 puts the financial condition of the Project Applicant at issue. However, the commenter does not explain how the Project Applicant's financial condition is relevant to the adequacy of the DEIR and does not point to any CEQA authorities requiring such an analysis. While an EIR may exclude a project alternative that is economically infeasible (*Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.4th 866), that issue is distinct from the financial condition of the Project Applicant.

Response to Comment Ind 255-33

The commenter reiterates that the financial condition of the Project Applicant or other asserted evidence that the project is economically infeasible renders the DEIR inadequate. However, the commenter does not point to any CEQA authorities to support the notion that the project's financial condition is relevant to project's impact to the environment. CEQA defines "environment" to mean the "physical conditions which exist within the area which will be affected by a proposed project,

including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance." (Pub. Resources Code, §21060.5.)

Response to Comment Ind 255-34

The commenter states that the discussion of the Reduced Hours alternative on DEIR page 6-13 puts the financial condition of the Project Applicant at issue. The commenter does not provide any CEQA authorities to support this argument. The commenter is referred to Responses to Comments Ind 255-32 and Ind 255-33.

Response to Comment Ind 255-35

The commenter states that the discussion of the Reduced Hours alternative on DEIR page 6-13 puts the financial condition of the Project Applicant at issue. The commenter does not provide any CEQA authorities to support this argument. The commenter is referred to Responses to Comments Ind 255-32 and Ind 255-33.

Response to Comment Ind 255-36

The commenter references the “Non-CEQA Related Analysis” (i.e., public safety power shutoff) on DEIR pages 4.3-103–4 and reiterates concerns regarding the financial condition of the Project Applicant. The commenter states that the Non-CEQA Related Analysis indicates that the DEIR is inadequate but offers no additional information. Regarding the financial condition of the Project Applicant, the commenter is referred to Responses to Comments Ind 255-32 and Ind 255-33.

Response to Comment Ind 255-37

The commenter states that the DEIR does not properly assess the impacts of climate change in connection with groundwater supplies. The commenter also states that the DEIR inadequately assesses the project’s impacts to groundwater. The commenter does not explain how the DEIR is inadequate with regard to these topics. Regarding climate change, the commenter is referred to Master Response 16 – Drought and Climate Change. Regarding groundwater, the DEIR analyzed the project’s impacts to groundwater supplies and found those impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) Regarding the conditions of the underground mine workings, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model. Please also see Response to Comment Ind 254-17.

Response to Comment Ind 255-38

The commenter states that the remedial cleanup action at the Centennial Industrial Site should be included in the DEIR for the Idaho-Maryland Mine Project. The commenter also states that the Project Boundary in the DEIR is inadequate because the DEIR underestimates the number of impacted groundwater wells. Regarding the Centennial Industrial Site, the commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA. Regarding the number of groundwater wells impacted by the Project, the commenter is referred to Master Response 7 – Location of Future Mining Areas, and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 255-39

The commenter states that the DEIR fails to properly list a “Statement of Objectives” as required by CEQA Guideline section 15124(b) but provides no reasons why the DEIR is inadequate in this regard. The Project Objectives may be found at DEIR pages 3-11–2.

Response to Comment Ind 255-40

The commenter states that the DEIR fails to include the mandatory elements in the Project Description as required by CEQA Guidelines section 15124. Specifically, "a general description of the project's technical, economic, and environmental characteristics…" (Cal. Code Regs. tit. 14, § 15124(c).) However, the commenter does not explain how the DEIR is inadequate with regard to Section 15124(c).

Response to Comment Ind 255-41

The commenter states that the DEIR fails to meet the requirements of CEQA Guideline sections 15124(d) and (d)(2), which requires, among other things, a list of permits or discretionary approvals required for the project. The commenter states the DEIR makes it difficult to know what permits or discretionary approvals are being sought. Per the requirement in Section 15124(d)(1)(B), a "list of permits and other approvals required to implement the project" is available in DEIR Chapter 3.0 (Project Description), pages 3-46 to 3-48.

The commenter incorrectly states that hexavalent chromium is ignored in the DEIR. Please see Response to Comment Ind 254-1.

Response to Comment Ind 255-42

The commenter states that the DEIR contains an inadequate description of the environmental setting as required by CEQA Guidelines section 15125. The commenter specifically states that the DEIR's baseline is inadequate because it does not include the entire mineral rights boundary. However, the DEIR does not limit analysis of impacts to an area smaller than the mineral rights boundary, and includes analysis of impacts in all appropriate geographic areas. (DEIR, Figure 3-2.) The commenter is also referred to Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 255-43

The commenter reiterates that the project violates CEQA Guidelines section 15125 regarding the environmental setting but does not provide any specific information on which to formulate a response. The commenter expresses general opposition to the project which is noted for the decision makers. The commenter does refer to concerns about what problems will be created as the project blasts, tunnels, removes rock, and adds Cr+6 in the shoring cement paste, dewaters, and otherwise mines in new, expanded, and deeper areas. For concerns regarding hexavalent chromium, please see Response to Comment Ind 254-1. For concerns regarding blasting, see Response to Comment Ind 254-72. Regarding dewatering concerns, please see Master Responses 14 and 15.

Response to Comment Ind 255-44

The commenter states that the DEIR violates CEQA Guideline section 15125(a)(3), which states that the "existing conditions baseline shall not include hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, as the baseline." The commenter states that because the Idaho-Maryland Mine was last operated in 1956, the environmental baseline is hypothetical and speculative. However, the commenter does not specifically state how the project's baseline is inadequate. In addition, investigation of the underground conditions has occurred to the extent feasible. For example, water samples were collected from the New Brunswick shaft in 2018 and analyzed for a range of total petroleum hydrocarbons (TPH), semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and mercury (see Table 3.6 of Appendix K.2).

The CEQA Guidelines specify that the baseline generally should be described as the physical conditions that exist in the area affected by the project at the time the EIR process begins. (Cal. Code Regs., tit. 14, § 15125(a)(1).) The commenter does not identify any specific deficiency in the DEIR.

Response to Comment Ind 255-45

The commenter discusses the rights of overlying property owners above the mineral rights boundary and references United States Supreme Court caselaw regarding the interpretation of a Pennsylvania statute about coal mining and support for structures on the surface. These comments do not pertain to the adequacy of the DEIR. To the extent the commenter is concerned about subsidence, the commenter is referred to Master Response 29 – Near Surface Workings.

Response to Comment Ind 255-46

The commenter states that the DEIR violates CEQA Guidelines section 15125(d), which requires an EIR to discuss any "inconsistencies between the proposed project and applicable general plans, specific plans and regional plans." The commenter provides no additional information on which to formulate a response. The referenced inconsistency analysis is provided in Impact 4.9-2 of the DEIR. The DEIR found that the project is generally consistent with the Nevada County General Plan land use designations, with consideration of the requested approvals. (DEIR, Figure 3-5.) The DEIR also found the project would have a less than significant impact on regional plans such as the applicable air quality plan. (DEIR, p. 4.3-66.)

Response to Comment Ind 255-47

The commenter suggests that the Project Applicant is not the actual "Applicant" as defined by CEQA Guideline section 15351 by referencing the Project Applicant's SEC filings. SEC filings are irrelevant to the adequacy of the DEIR. The commenter does not provide any additional evidence to substantiate this claim and no further response is required.

Response to Comment Ind 255-48

The commenter states that the DEIR is drafted in a way to conceal errors, omissions, and deficiencies. This comment is vague and does not identify any inadequacies with the DEIR. No further response is required. Regarding hexavalent chromium, which is addressed in the DEIR, please see Response to Comment Ind 254-1.

Response to Comment Ind 255-49

The commenter states that the DEIR violates CEQA Guideline section 15123. The commenter does not state how the DEIR is inadequate in this regard. All of the DEIR components required by Section 15123 can be found in the DEIR's Chapter 2.0 (Executive Summary.)

Response to Comment Ind 255-50

The commenter states that the Nevada County Planning Commission should have allowed public comment regarding the financial condition of the Project Applicant at the March 24, 2022 hearing. The commenter does not identify any CEQA authorities that requires an analysis of a Project Applicant's financial condition.

Individual Letter 256

Dist

~~I support re-opening the Idaho-Maryland Mine~~

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighborhood and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new jobs in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous living.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO TO REOPENING THE MINE.

Name(s) GABRIEL KULP

Address 12819 LOMA RICA DR. GV ZIP 95945

Phone 530-274-8965

Email Address ACESWELDING@HOTMAIL.COM

Ind 256-1

INDIVIDUAL LETTER 256: GABRIEL KULP

Response to Comment Ind 256-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 257

Gail Johnson Vaughan, PsyD
11793 Lower Colfax Rd. Grass Valley, CA 95945

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

RE: Inadequate Assumptions of DEIR

Dear Mr. Kelley,

Ind 257-1

I am Gail Johnson Vaughan, a 40-year resident of our County, the last 20 of which have been in District 3. I hold a doctoral degree in Organizational Psychology with a special interest in Behavioral Economics and the psychology of decision making.

As a forty-year resident of Western Nevada County I have severe concerns about the inadequacy and lack of accuracy of the Draft Environmental Impact Report . My overriding concerns fall in two areas: 1) assumptions on which the report is based, and 2) the lack of inclusion of exacerbating impact on the climate crisis.

Ind 257-2

The draft EIR fails to give your department and the Board of Supervisors the adequate analysis you need to determine whether this project benefits our County sufficiently to outweigh the consequences of its negative impacts now and for the next four generations of our residents. The science supporting the DEIR is only as good as the accuracy of the assumptions on which it is based. This DEIR uses a limited and faulty set of assumptions.

Daniel Kahneman, PhD in psychology, was awarded the Nobel Prize in Economics, for his work on the psychology of judgment and economic decision-making. He tells us that "intuition cannot be trusted in the absence of stable regularities of the environment."[1]

At no time in human history has there been a greater absence of stable environmental regularities than we are experiencing now. The DEIR does not assess these irregularities of our environment before assigning a level of significance to a range of environmental impacts. Kahneman goes on to say "In a less regular, or low-validity, environments, the heuristics of judgment are invoked", [such as the substitution heuristic] where "quick answers to difficult questions are produced by substitutions, creating coherence where there is none and the question answered is not the one intended."[2]

The reality of this is made clear in the statement at the NID Board Meeting on February 9, 2022 by Itasca principle hydrologist Liu Houmau, PhD. He said: "... but definitely we did not look into

[1] Kahneman, Daniel, (2011). *Thinking, Fast and Slow*. Pg 241
[2] Kahneman, Pg 243

Gail Johnson Vaughan, PsyD
11793 Lower Colfax Rd. Grass Valley, CA 95945

the extensive [impact] of climate change because those are not defined into the future." The fact that they are not defined into the future explodes the expectation that the DEIR analysis of impacts and mitigations can be relied upon for 80 years.

Intuition based on historical data permeates this DEIR. To be adequate in this era of environmental irregularities this EIR must go beyond a single set of assumptions drawn from historical data and include multiple sets of assumptions which take into consideration the continuum of possible and perhaps unthinkable impacts of a changing climate over 80 years.

The DEIR relies on intuition in a number of ways.

Ind 257-3
- It is the sort of intuition that concludes that assumptions of impact based on historical data are sufficient to predict the full negative impact of this project when we sit at the 11th hour of life-threatening climate change.

Ind 257-4
- It is the kind of intuition that argues that although Dr Liu, DEIR expert hydrologist states that it is not possible to create a predictive hydrology impact model that takes climate change into consideration, that it acceptable to base the DEIR analysis of well integrity and water quality for the next 80 years on historical data that assumes a cycle of a few dry years followed by many wet years.

Ind 257-5
- It is the kind of intuition that argues that it acceptable to assume that the consequences of the project's negative air quality impact are not significant even when added to our County's failing air quality grade from American Lung Association.

Ind 257-6
- It is the kind of intuition that overlooks the facts that the project's negative impacts exacerbate the speed of climate change, that even now is resulting in unprecedented ongoing drought, and resultant horrific smoke-smothering wild fires.

Ind 257-7
- It is the kind of intuition that assumes it is acceptable for the project's energy use to make the Nevada County Energy Action Plan's electricity savings objectives impossible to meet as well as double current non-residential emissions and undercut the Energy Action Plan's goal of reducing water use countywide and encouraging smart efficient use of precious water resources.

Ind 257-8
- It is the kind of intuition that assumes that it is acceptable to allow "fugitive dust" including microparticles of asbestos to enter our air mitigated only by spraying water on them as well as omitting effective mitigations for "fugitive dust" escaping during the hundreds of daily truckloads of crumbled rock extracted from the mine.

Ind 257-9
These examples of faulty assumptions highlight some, but not all of the inadequacies of the DIER assumptions. Good enough for now is not good enough to predict the extensive impact of climate change on the already massive number of negative environmental impacts of this project. While we cannot know exactly what those extensive impacts of climate change will be it is imperative that the EIR include a range of assumptions across the continuum of possible

Gail Johnson Vaughan, PsyD
11793 Lower Colfax Rd. Grass Valley, CA 95945

and perhaps unthinkable impacts of a changing climate over 80 years. It is also imperative that the EIR include a range of flexible mitigations, all acceptable by Rise Gold prior to starting the project, that can be implemented based on conditions in the moment.

Thank you for considering my comments.

Gail Johnson Vaughan

Gail Johnson Vaughan, PsyD
11793 Lower Colfax Rd, Grass Valley, CA 95945
gail@gjv4kids.com 530-277-6571

INDIVIDUAL LETTER 257: GAIL VAUGHAN

Response to Comment Ind 257-1
This comment is introductory in nature. The commenter states the DEIR is inadequate. Please see Master Response 1.

Response to Comment Ind 257-2
The commenter states that the DEIR relies on a faulty set of assumptions but does not provide sufficient additional detail to enable a specific response. The commenter also states that the DEIR cannot be relied upon over the life of the project because of unknowns related to climate change. California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342.) The commenter is also referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 257-3
The commenter reiterates that the DEIR cannot be relied upon because of the climate change. The commenter is referred to Response to Comment Ind 257-2. The commenter is also referred to Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 257-4
The commenter states that hydrological impacts cannot be predicted to the climate changed. The commenter is referred to Response to Comment Ind 257-2. The commenter is also referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 257-5
The commenter states that the County has existing air quality issues and the project will exacerbate those issues. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 257-6
Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 257-7
The commenter states that the project's energy consumption will impede Nevada County's Energy Action Plan. The commenter is referred to Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Ind 257-8
The commenter states that the project will result in adverse impacts to air quality such as fugitive dust and asbestos. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 18 – Air Quality Thresholds, Master Response 22 – Conservatism of Asbestos Assumptions, and Response to Comment Ind 187-3.

Response to Comment Ind 257-9
The commenter reiterates concerns with project's contribution to climate change. The commenter is referred to Master Response 27 – Greenhouse Gas Thresholds and Master Response 16 – Drought and Climate Change. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Individual Letter 258

Nevada County Planning Commission Public Hearing 3-24-2022
Public Comment

Honorable Chair and Commission members. I am Gail Johnson Vaughan, a 40-year resident of our County. I hold a doctoral degree in Organizational Psychology with a special interest in Behavioral Economics and the psychology of decision making.

You are tasked with the awesome responsibility of recommending to our Board of Supervisors whether this project benefits our County sufficiently to outweigh the consequences of its negative impacts now and for the next four generations of our residents. You have been provided with a draft EIR that fails to give you the adequate analysis you need to make that recommendation. **Ind 258-1**

Psychologist Daniel Kahneman was awarded the Nobel Prize in Economics, for his work on the psychology of judgment and economic decision-making. He tells us that "intuition cannot be trusted in the absence of environmental regularity." At no time in human history has there been a greater absence of environmental regularity than we are experiencing now.

The DEIR relies on intuition in a number of ways.

- It is the sort of intuition that concludes that assumptions of impact based on historical data are sufficient to predict the full negative impact of this project when we sit at the 11th hour of life-threatening climate change. **Ind 258-2**

- It is the kind of intuition that argues that although Dr Lui, DEIR expert hydrologist, states that it is not possible to create a predictive hydrology impact model that takes climate change into consideration, that it acceptable to base the DEIR analysis of well integrity and water quality for the next 80 years on historical data that assumes a cycle of a few dry years followed by many wet years. **Ind 258-3**

- It is the kind of intuition that argues that it acceptable to assume that the consequences of the project's negative air quality impact are not significant even when added to our County's already failing air quality grade from American Lung Association, and even when the project's negative impacts exacerbate the speed of climate change, that already is resulting in unprecedented ongoing drought, and horrific smoke-smothering wild fires. **Ind 258-4**

- That it is acceptable to allow "fugitive dust" including microparticles of asbestos to enter our air mitigated only by spraying water on them and no mitigation from "fugitive dust" escaping during the hundreds of daily truckloads of crumbled rock extracted from the mine. **Ind 258-5**

- It is the kind of intuition that permeates the DEIR. The science supporting the DEIR is only as good as the accuracy of the assumptions on which it is based. Perhaps the greatest inadequacy of the DEIR is basing its analysis on a single set of assumptions rather than multiple sets of assumptions which take into consideration the continuum of possible and perhaps unthinkable impacts of a changing climate over 80 years. Those multiple sets of assumptions must be added to the DEIR. Thank you. **Ind 258-6**

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MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Gail Johnson Vaughan, PsyD
11793 Lower Colfax Rd, Grass Valley, CA 95945

INDIVIDUAL LETTER 258: GAIL VAUGHAN

Response to Comment Ind 258-1
Please see Response to Comment Ind 257-2.

Response to Comment Ind 258-2
Please see Response to Comment Ind 257-3.

Response to Comment Ind 258-3
Please see Response to Comment Ind 257-4.

Response to Comment Ind 258-4
Please see Responses to Comments Ind 257-5 and 257-6.

Response to Comment Ind 258-5
Please see Response to Comment Ind 257-8.

Response to Comment Ind 258-6
Please see Response to Comment Ind 257-9.

Individual Letter 259

From: Garrett Stuessy <dreamtime2013@gmail.com>
Sent: Monday, April 4, 2022 2:38 PM
To: Idaho MMEIR
Subject: My Opposition to opening the Idaho maryland Mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Mr Kelly, and Nevada County planning dept,

Ind 259-1 I have been a Nevada county resident for 9 years, a homeowner (I lost my home in the river fire), and a father of 2 middle school kids. We now live near Cedar ridge, and pass by the mine site daily. I am now involved in Real Estate and I see that this proposed project will drastically impact this industry and all of the property values in the area. It is my position that the DEIR has severely underestimated all of the environmental impacts that would come about.

Ind 259-2 Firstly, the groundwater. This kind of disruption underground can have unforeseen impacts on the aquifers, water table and wells in a wide ranging area, the DEIR analysis is inadequate and obviously slanted towards the outside mining company. Nobody wants the kind of noise and heavy traffic that will come with such a project. We all live in nevada county because we want to have unspoilt nature around us, and some form of peace. Silicosis is a very real concern from all the dust that will abound, it can damage lungs indiscriminately, and easier than you may think. I should also mention my opinion that the wildlife here also has a right to a habitat and a peaceful existence, and the mine is a threat to that.

Ind 259-3 In a time when we collectively have no choice but to reduce greenhouse gas emissions, this is a step backwards. in our own back yard! The mine represents nothing more than a humiliating admission that our county would rather have its own mineral resources plundered, sacrifice our 'backyard' for a few blue collar jobs; than be a forward thinking example of how a California county can adapt to changes in the modern world. In other words, I feel that attracting businesses and families to relocate and bring their wealth here is a good thing, and this would be dealt a huge blow by the environmental impacts of this mine.

Ind 259-4 We must weigh up the economic benefits if there are any, with the damage that would come to the geloogy, soils, air quality, noise levels, aquatic biology and domestic wells, traffic, forestry and aesthetics right here at home, and climate change statewide and globally. I see that the negative impacts far outweigh any positives, and I see that the DEIR report has not been thorough enough to be realistic, it has let us down as a community.

sincerely,
Garrett Stuessy

concerned Grass Valley resident/ homeowner/ investor/ father

INDIVIDUAL LETTER 259: GARRETT STUESSY

Response to Comment Ind 259-1

The comment notes the DEIR underestimates the impacts of the proposed project but does not detail the specific inadequacies. Therefore, a detailed response cannot be provided. Please also see Master Responses 1 and 2.

Response to Comment Ind 259-2

Please see Master Response 14 with regard to the adequacy of the groundwater model. Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution impacts, specifically Impact 4.3-2 addresses concerns regarding health risks associated with silica exposure. Please also see Master Response 21 – Conservatism of Silica Assumptions. In addition, impacts related to noise, traffic, and wildlife habitat are addressed in Chapter 4.10, Noise and Vibration, Chapter 4.12, Transportation, and Chapter 4.4, Biological Resources, of the DEIR, respectively.

Response to Comment Ind 259-3

Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to climate change. In addition, please see Master Response 2 with regard to social and economic impacts.

Response to Comment Ind 259-4

The comment is a closing remark and does not specifically address the adequacy of the DEIR. The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 260

February 7, 2022

Nevada County Planning Commission
950 Maidu Avenue Suite 170
Nevada City, CA 95959

RE: RE-OPENING OF THE IDAHO-MARYLAND MINE

Dear Commissioners:

Ind 260-1 1) De-watering the mine would send 2500 gallons of water per minute into Wolf Creek which is equivalent to a "flood surge". Ongoing de-watering would send about 850 gallons of water per day into the creek for the duration of the project. The effect of this abnormal water flow is unpredictable and could adversely affect local water resources.

Furthermore, mine contaminants in the water adds to the problem of water quality.

Ind 260-2 2). The amount of energy to run this gold mine is 10 megawatts per day. The mine is estimated to contribute about 150 metric tons of CO2 daily into the atmosphere.

These are my two main concerns about this mine project. Either one is enough to deny approval of this project. We are paying a price for past environmental abuse that has caused climate change. Please don't contribute further to this global problem.

Ind 260-3 Vote "no" on re-opening this mine.

Sincerely,

Gary K. Ambuehl
10701 Bragg Avenue
Grass Valley, CA 95945
PH: 530-274-0492

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FEB 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 260: GARY AMBUEHL

Response to Comment Ind 260-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 35 and 36 regarding water quality and flows in South Fork Wolf Creek.

Response to Comment Ind 260-2

Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to energy usage and greenhouse gas emissions. The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 260-3

The comment is a closing remark and does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 261

FEB 10 2022
NEVADA COUNTY
BOARD OF SUPERVISORS
Dist 3

February 7, 2022

Nevada County Board of Supervisors
950 Maidu Avenue Suite 200
Nevada City, CA 95959

RE: RE-OPENING OF THE IDAHO-MARYLAND MINE

Dear Commissioners:

Ind 261-1 1) De-watering the mine would send 2500 gallons of water per minute into Wolf Creek which is equivalent to a "flood surge". Ongoing de-watering would send about 850 gallons of water per day into the creek for the duration of the project. The effect of this abnormal water flow is unpredictable and could adversely affect local water resources.

Furthermore, mine contaminants in the water adds to the problem of water quality.

Ind 261-2 2). The amount of energy to run this gold mine is 10 megawatts per day. The mine is estimated to contribute about 150 metric tons of CO2 daily into the atmosphere.

These are my two main concerns about this mine project. Either one is enough to deny approval of this project. We are paying a price for past environmental abuse that has caused climate change. Please don't contribute further to this global problem.

Ind 261-3 Vote "no" on re-opening this mine.

Sincerely,

Gary K. Ambuehl
10701 Bragg Avenue
Grass Valley, CA 95945
PH: 530-274-0492

INDIVIDUAL LETTER 261: GARY AMBUEHL

Response to Comment Ind 261-1
See Response to Comment Ind 260-1.

Response to Comment Ind 261-2
See Response to Comment Ind 260-2.

Response to Comment Ind 261-3
See Response to Comment Ind 260-3.

Individual Letter 262

From: Gary Baker <gary@plan-aire.com>
Sent: Thursday, January 20, 2022 12:14 PM
To: Idaho MMEIR
Cc: Ed Scofield
Subject: Response to Idaho-Maryland Mine Draft EIR
Attachments: Response to Draft EIR January 19, 2022.pdf

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Matt Kelly and Ed Scofield

Ind 262-1 Attached are my comments on the Draft EIR for the Idaho-Maryland Mine Project. There are only 6 pages of comments provided after my review of the entire 1070 pages of the Draft document.

Any project being proposed should have a benefit to the community and while the project as described will employ about 300 people, many of those workers will come from outside the County.

Ind 262-2 This is a large private operation which has some significant impacts which are not mitigated. Additionally there were very few alternatives examined to reduce those significant and unavoidable impacts. The project does not contain any public improvements other than the fire engine for Ophir Hill and a water line to serve about 40 people. With the amount of land included in the project, areas could have been set aside for parks, trails or other public improvements but they are not included.

Ind 262-3 As stated in my comments attached, the Draft EIR does not appear to be neutral and reads as a biased presentation supporting a private mining operation. This Draft EIR is certainly superior to the EIR prepared for the Cannabis Ordinance three years ago, however there should have been more alternatives presented to mitigate some of the visual concerns which were considered significant and unavoidable. Some ideas are presented in my responses to mitigate some of the visual impacts.

Ind 262-4 Clearly this project will attack a lot of public attention and while I have no particular vested interest in whether the project is approved or not, I do believe there could have been more sensitivity in the project design to mitigate some of the visual impacts. I also believe that the community should receive some benefits from a project and not just unavoidable impacts from a private development.

Gary Baker
530 268-3500
gary@plan-aire.com

Plân-aire CANNABIS SITE PLANNING AND REGULATORY AGENCY PERMITTING
12373 CREEK VIEW DR., GRASS VALLEY, CA 95949 • PH (530) 268-3500 • EMAIL: gary@plan-aire.com
LANDSCAPE ARCHITECTURE & PLANNING • www.plan-aire.com

January 19, 2022

Matt Kelley
Senior Planner
County of Nevada
Community Development Agency
Planning Department
950 Maidu Avenue, Suite 170
Nevada City, California 95959

Via e-mail: Idaho.MMEIR@co.nevada.ca.us

Regarding: Reponses to Draft EIR for the Idaho-Maryland Mine Project
SCH# 2020070378

To: Matt Kelley

From: Gary Baker

Ind 262-5 I have read the 1070 pages of the Draft EIR for the proposed project and have included below my comments below on various sections of the document. There were no links in the document which allowed for the download of any of the appendices and there was no link on the County website for downloading these either.

Ind 262-6 This Draft EIR is far superior to the EIR prepared for the Nevada County Cannabis Ordinance which was circulated three years ago. However, it is my personal opinion that the Idaho-Maryland Mine Project Draft EIR is not a neutral document and presents a very favorable and biased picture of the proposed project and lacks alternatives to mitigate environmental impacts which have been identified as significant. This project if approved will expose the community to potential traffic impacts from the trucking of material, the delivery of explosives to the site, visual impacts as well as other impacts which may not be significant as identified in the EIR but in fact may be just more than nuisance for some residents of the County.

Ind 262-7

Plan-aise

Ind 262-8 For instance, the projects evaluation in the Draft EIR says that Heavy Truck traffic was not included in the traffic study. There were no alternatives provided for the buildings

Ind 262-9 higher than 45' or justification provided for the increased building heights. There was no

Ind 262-10 evaluation of the impacts of the industrial land and potential buildings which may be located on the land and pad areas created by this project. The alternatives presented in the Draft EIR only include the No Project, Reducing one fill area while increasing the

Ind 262-11 other and reducing the mine output while still building all of the improvements. That does not appear to be a reasonable set of alternatives.

Ind 262-12 The main beneficiary of the project appears to be the Ophir Hill Fire Department who will receive $1.0 million dollars when the project is approved. There was no financial benefit analysis presented in the Draft EIR as to any benefit to the community as a result of the project except the creation of about 300 new jobs which a portion of those jobs would employ people who do not currently live in Nevada County. Mining at the site of the

Ind 262-13 magnitude presented in the Draft EIR should create very large profits for the mine owner over the 80 year life of the operation, yet there is not a single improvement proposed which enhances Nevada County such as a new park, trail system or library as a result of the project. Other than the fire truck, the project only provides private improvements for a private project.

Wolf Creek Discharge

Ind 262-14 During the NOP public review timeframe ending in August 2020, we submitted various comments on the proposed project that we believed should be addressed in the EIR. While a few of those suggestions were in fact discussed in the Draft EIR, several suggestions were not addressed which related to alternatives for the water being discharged by the operation of the dewatering of the mine and long term dewatering during the operation of the mine. All of the project descriptions and alternatives, other than the no project alternative, discharge water from the mine into South Wolf Creek. While Wolf Creek may in fact be utilized today as a storm drain because of the discharges being introduced by the Grass Valley Sewage Treatment Plant and some dewatering operations at the North Star Mine, it is also considered a natural creek and watershed. Adding additional flows to Wolf Creek from the initial mine dewatering will have some impact on the water level of the creek, but more importantly, the creek is still being used as a storm drain to transfer volumes of water from the proposed mine.

We had previously asked to evaluate water discharge disposal alternatives for the prosed project. These could have included a variety of alternatives including but not limited to piping the water to agricultural or grazing lands for use and eventual ground

Plan-aise

water recharge or sending the water to evaporation ponds. Additionally, piping of the treated water to the Nevada Irrigation District for distribution via their vast network of canals may also be a viable option for the discharged waster from the project. Another alternative would be to use the recycled water for park, golf course or landscaping irrigation. Even if none of these alternatives are feasible, there should at least be some discussion in the Draft EIR on alternative discharges for the treated pumped water from the proposed mine other than disposal into a watercourse.

Visual Impacts

Ind 262-15 The proposed Idaho-Maryland Mine project includes the construction of two large pads designated as Centennial and Brunswick as well as a 64' high industrial building and a 165' high tower for mine operations. Both the 64' high building and 165' high tower exceed the maximum building height of 45' in the existing zoning. The two pads also create 31 acres of Industrial land on the Brunswick site and 44 acres of Industrial land on the Centennial site and both pads are identified in the Draft EIR as significant unavoidable visual impacts relating to the development of the project.

Ind 262-16 The Draft EIR does not contain and type of description or justification for the 64' building height or the 165' high tower. There were no drawings or diagrams provided which indicate the types of machinery or equipment that would be used with either of these structures to provide the reader of the Draft EIR of an understanding of why these building heights were required to operate the facility. Additionally, there were no

Ind 262-17 alternatives provided for different types of equipment which could be used as an alternate to keep the building height within the 45' height limit. Also, there was no examination of alternative constructions methods such as locating a portion of the 64' building underground to maintain the 45' height or placing the building in a depression so the buildings visibility from the adjacent view shed and roadway would not exceed the

Ind 262-18 45' height limit. The 165' tower appears to be excessive in height and no alternatives have been proposed to either redesign the components in the tower to lower the overall height. The proposed 80' tower which provides access to the mine appears to be consistent with the previous mine operation so the 165' high tower appears to be very excessive.

Ind 262-19 The two pads proposed to be created from material obtained from the underground mining operation are both identified in the Draft EIR as significant visual impacts. While the Draft EIR looked at two alternatives relating the proposed pads the result of those alternatives still used the same amount of fill material from the mining operation and where one pad would decrease in height the other pad would increase in height. There was no evaluation of building pads using less material thus creating an overall decrease

Plan-aise

in the visual impact of the proposed grading operation. The only rationale presented was the saving of costs by placing fill onsite rather than trucking the material offsite. It appears that viable pads to be used for industrial development would still be achieved if both of these pads were lower and it may be that the pads would actually be larger than what is proposed if they were not as high. The overall visual impact would be reduced if the pads were lower.

Ind 262-20

The site sections in the visual impact analysis is very misleading because the sections and graphics only show the 60' high pad and not the potential 45' high buildings that would potentially be constructed on top of the pad. Further, since one of the stated objectives of the project includes the construction of these pads, analysis should have been provided in the Draft EIR for all the impacts associated with the development of these pads. There would be impacts relating to sewer disposal, utilities and traffic among others which should have been included in the cumulative analysis at the very least.

Ind 262-21

The traffic portion of the Draft ER did not even show the development of these industrial pads as a future project, yet the pads which would readily be available to market after the construction. The total pad area is 75 acres which could contain hundreds of thousands of square feet of new development. Probably only a fraction of that square footage would be available without constructing the pads as proposed as part of the Idaho-Maryland Mine Project. There is a direct nexus between the mine operation and construction of these two pads for industrial use so the impacts of the industrial use should be fully considered in the EIR.

Water Supply

Ind 262-22

It is not clear why the amount of available water increased from 176,143 Ac Feet in the NID water storage in year 2 of the project to 381,346 Ac Feet in year three as shown on Table 4.11-6 during the drought years in the 2035 year forecast. The year 2 figure represents a potential deficit of 20,306 Ac Feet while year 3 of the drought condition shows a surplus of 155,447 Ac Feet. NID has disclosed that they are no longer pursuing the Centennial Dam project, so what water source was added to the NID system to increase the total amount of available water?

Noise

Ind 262-23

Noise levels were measured at receptor points which were located between 500' to 2,000 feet from the noise source. Other projects in Nevada County including cannabis projects are required to address noise concerns from a project as measured at the

Plan-aise

property line. It is unclear why a separate method of measuring noise levels is used for the Idaho-Maryland Mine Project compared to other county projects.

Future Mining Operations

Ind 262-24

Figure 4.8.13 shows potential future underground mining operations. The exhibit depicts several areas of future underground mining which extend beyond the current mineral claim of the Idaho-Maryland Mine. If there is an extension of mineral rights contemplated as part of the project the project description should be revised and impacts of that expansion should be included in the EIR.

Demand on Housing

Referencing Page 5-2 f the Draft EIR

As shown in Table 4.9-5 of Chapter 4.9, as of 2018, Nevada County had 53,745 total housing units with a 22.5 percent vacancy rate (12,098 vacant housing units). The unincorporated area of Nevada County had a total of 32,182 housing units with 4,645 vacant housing units (14.4 percent vacancy rate). Therefore, the addition of 312 persons as a result of the proposed project would not impact the existing housing stock for Nevada County.

Ind 262-25

In the Union newspaper, published is Grass Valley on January 18, 2022 the following information was printed.

The new record high median price of a home sold in western Nevada County — $565,000 — was set in July and matched again in August, before December sales closed out the year with a $515,000 monthly median price.

Prices aren't likely to come down soon, as western Nevada County struggles to establish any semblance of a normal inventory of homes on the market.

As of Wednesday, Jan. 12, there were 145 homes for sale locally, down 14% from the same time last year and 60% lower than the 360 homes listed for sale in pre-pandemic January 2019.

The housing situation is far different in Western Nevada County according to the recent report which shows 145 homes available and the findings in the Draft EIR which is showing 4,645 homes available. The Draft EIR should be reexamined to correlate with the current housing supply.

Traffic

Ind 262-26

5 of 6

Plan-aise

The traffic study appears to be inconsistent. On Table 4.12-8 there are 10 one way truck / trips per day and on page 4.13-15 there are 100 round trips per day shown. On page 4.12-55 the text shows that heavy trucks are not included in the Draft EIR.

It does appear that truck traffic and the impacts of the trucks entering and leaving the site from the proposed project should be included in the EIR.

Mine Operations

Many if not most gold mines start with one operator and after a period of time the mine is sold to another operator, or the mine is closed for long periods of time, sometimes for years due to market pricing of the commodity or other factors. When the mine is not operating, security and other services must still be provided for the site. When new operations begin, there may be changes proposed which were not addressed in previous environmental documents or local permits.

Ind 262-27

The Draft EIR is addressing the project as if it will operate continuously for 80 years under the same conditions and ownership. There is no discussion in the Draft EIR which looks beyond the current design or impacts of the project as currently proposed. For the mine to be viable for future operations if it closed for periods of time, dewatering must still be maintained for the life of the project, even if gold is not currently being extracted. Some provision should be included to ensure that adequate water treatment and site security is maintained for the life of the project which could be guaranteed by the posting of some type of bond. Furthermore, if the project design were to change which requires additional buildings or other improvements which were not addressed in the original EIR an updated EIR should be required for the project.

While these may not be considered environmental impacts as such, in periods where the mine is not operating certain protections should be put in place to protect the community from both environmental impacts and site safety from the proposed Idaho-Maryland Mine Project whether the mine is operating or not.

6 of 6

INDIVIDUAL LETTER 262: GARY BAKER

Response to Comment Ind 262-1
The comment is an introductory comment. No response is required.

Response to Comment Ind 262-2
The commenter alleges that very few alternatives were examined to reduce the proposed project's significant and unavoidable impacts. The DEIR evaluates alternatives to the proposed project in Chapter 6. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Response to Comment Ind 262-3
The commenter suggests that the DEIR is biased. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR.

Regarding alternatives, please see Response to Comment Ind 262-2.

Response to Comment Ind 262-4
The comment does not address the adequacy of the DEIR but expresses the opinion that more sensitivity in project design could have been employed to mitigate some of the visual impacts. The comment is noted for the record and has been forwarded to the decision-makers for their consideration.

Response to Comment Ind 262-5
The comment does not address the adequacy of the DEIR. As part of Nevada County's efforts to make the DEIR available for public review, all DEIR materials, including appendices, were made available to be downloaded at the following web address: https://www.nevadacountyca.gov/3436/Idaho-Maryland-Mine-Draft-EIR.

Response to Comment Ind 262-6
Please see Response to Comment Ind 262-3.

Response to Comment Ind 262-7
The comment does not directly address the adequacy of the DEIR. Regarding transport of explosives to the site, please see Master Response 10 – Explosives, Reagents, and Brunswick Fill. Regarding truck traffic, please see the analysis in Chapter 4.12, Transportation, of the DEIR. Visual impacts are addressed in Chapter 4.1, Aesthetics, of the DEIR.

Response to Comment Ind 262-8

As discussed on page 4.12-52 of the DEIR, an analysis of VMT from heavy truck trips is not required pursuant to SB 743 and the CEQA Guidelines and, thus, was not included in the DEIR. For further details, please see DEIR pages 4.12-53 through 4.12-55. However, it is important to note that the remaining transportation analyses contained in the DEIR (e.g., level of service, queuing) did evaluate the potential effects of the project's heavy truck traffic. For an example of supporting evidence, please refer to Table 4.12-8, Project Trip Generation, which includes project haul traffic.

Response to Comment Ind 262-9

Please see Response to Comment Ind 262-2.

Response to Comment Ind 262-10

With respect to potential future development of industrial uses on the proposed engineered fill pads, such projects will be required to demonstrate compliance with applicable policies, regulations, and standards set forth at the federal, State, and local level as part of obtaining necessary permit approvals before construction of such uses could commence. In addition, future development applications for industrial uses on the engineered fill pads would require separate discretionary approval, thus requiring separate CEQA environmental review. As future potential industrial uses are not a component of the proposed project, such uses are not evaluated in the DEIR.

Response to Comment Ind 262-11

Please see Response to Comment Ind 262-2.

Response to Comment Ind 262-12

A financial benefit analysis is not required pursuant to CEQA - please see Master Responses 1 and 2. Nevertheless, an economic analysis for the project is being prepared by the County separate from the CEQA process.

Response to Comment Ind 262-13

The comment does not address the adequacy of the DEIR, but rather asserts that the project does not enhance Nevada County. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Response to Comment Ind 262-14

Regarding alternatives, please see Response to Comment Ind 262-2. In addition, please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek.

Response to Comment Ind 262-15

The commenter correctly cites the significant and unavoidable impact determined by the DEIR to occur as a result of the proposed project with respect to Impact 4.1-2, which starts on page 4.1-14 of the DEIR. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-

significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Please see Response to Comment Ind 262-2.

Response to Comment Ind 262-16

Pursuant to CEQA, an EIR is required to evaluate the physical environmental impacts of the project, as proposed by the applicant. CEQA does not require an EIR to explain why the applicant is proposing certain project features. Notwithstanding, the requested heights of the proposed 64-foot-tall process plant, the proposed 165-foot-tall headframe for the Brunswick shaft, the proposed 80-foot-tall headframe for the proposed service shaft, and the proposed 50-foot-tall hoist buildings associated with the two mine shafts require a variance from the County. The County will need to make certain findings in order to approve the variance, during which time the County will consider the applicant's justification for the increased heights.

The types of machinery and equipment within each of the structures is identified throughout the DEIR as necessary (e.g., operational noise analysis). However, engineering level detail, such as actual brands and types of equipment, is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 262-17

Please see Response to Comment Ind 262-2.

Response to Comment Ind 262-18

Please see Response to Comment Ind 262-2 and 262-16.

Response to Comment Ind 262-19

Please see Response to Comment Ind 262-2.

Response to Comment Ind 262-20

Please see Response to Comment Ind 262-10.

Response to Comment Ind 262-21

Please see Response to Comment Ind 262-10.

Response to Comment Ind 262-22

Table 4.11-6 of the DEIR references NID's 2020 Urban Water Management Plan, specifically Tables 5-1, 5-2, and 5-3. Please refer to said tables, in particular, Table 5-3, which shows that the increased water supply in multiple dry year 3 is due to carryover water storage.

Response to Comment Ind 262-23

Please see Response to Comment Ind 617-5.

Response to Comment Ind 262-24

Please see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 262-25

As shown in Table 4.9-5, the DEIR relies upon housing unit totals and vacancy rates presented in the Nevada County 2019-2027 Housing Element Update, which is the currently adopted Housing Element for the County. As such, the data presented in Table 4.9-5 of the DEIR is sufficient.

Furthermore, it should be noted that the commenter challenges the legitimacy of the DEIR's data pertaining to housing supply and vacancy rates for the entire County, by conflating the DEIR's data with information provided in the Union newspaper for an unspecified area "locally" in western Nevada County. Thus, the sets of data cited by the commenter do not involve the same geographical area, and thus, cannot be compared in the manner in which the commenter presents the argument.

Response to Comment Ind 262-26

The commenter misinterprets the data presented in Chapter 4.12, Transportation, and Chapter 4.13, Wildfire, of the DEIR. With respect to Table 4.12-8, the 10 one-way truck trips per day apply specifically to gold concentrate-related haul traffic to the Brunswick Industrial Site. Meanwhile, the 100 round trips per day discussed on page 4.13-15 of the DEIR pertain to transport of engineered fill and represent the maximum amount of such trips that could be required. Thus, the commenter is citing different types of trips that would be expected to occur as part of the proposed project, which accordingly, would involve different trip amounts.

With respect to the discussion cited by the commenter that occurs on page 4.12-55, as detailed on pages 4.12-53 through 4.12-55 of the DEIR, an analysis of VMT from heavy truck trips is not required pursuant to SB 743 and the CEQA Guidelines and, thus, was not included in the DEIR. However, truck trips were included in the DEIR's analysis of potential project impacts related to LOS, traffic-related safety hazards, and cumulative impacts.

Response to Comment Ind 262-27

Please see Master Response 3 – Operator Responsibility. It is also noted that, as stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the mining operation's approved Plan.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 263

From: Gary C <ecstasy4me2@gmail.com>
Sent: Saturday, April 2, 2022 12:57 PM
Subject: IDAHO MARYLAND/RISE GOLD MINE DEIR AND OTHER ISSUES

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Some of the top concerns include:

CONTINUING LAWSUITS AGAINST MINE OPERATORS

Ind 263-1

WILDLIFE DISRUPTION

Ind 263-2

REAL ESTATE PROPERTY VALUES DECREASING

Ind 263-3

DEIR FLAT OUT MISTAKES

Ind 263-4

- The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

Ind 263-5

- Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

Ind 263-6

- Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".

Ind 263-7

- Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 263-8

- Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 263-9

- The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

Ind 263-10

- Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.

Ind 263-11

- Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

1

Ind 263-12

- The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

Ind 263-13

- Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions

Gary cartzdafner @ grass valley

INDIVIDUAL LETTER 263: GARY CARTSDAFNER

Response to Comment Ind 263-1
The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 263-2
Please refer to Chapter 4.3, Biological Resources, of the DEIR for more information related to wildlife disruption. The comment expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 263-3
The comment does not address the adequacy of the DEIR. Please see Master Response 2 – Social and Economic Issues.

Response to Comment Ind 263-4
Please see Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 263-5
Please see Master Response 8 – Mine Waste Characterization and Master Responses 22 and 23 regarding asbestos.

Response to Comment Ind 263-6
Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 263-7
Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 263-8
The comment expresses a general opinion that missing construction time estimates throw off the entire analysis of noise, traffic, and air, but does not provide specific examples that would allow for a detailed response. Please also see Master Response 24 – Project Construction Schedule.

Response to Comment Ind 263-9
The comment expresses a general opinion that the DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods, but does not provide specific examples that would allow for a detailed response.

Response to Comment Ind 263-10
See Response to Comment Grp 7-95.

Response to Comment Ind 263-11
The comment expresses a general opinion that blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours, but does not provide specific examples that would

allow for a detailed response. It addition, it is unclear what blasting plan, as well as what U.S. mining guidelines to which the commenter is referring. Impacts related to blasting are addressed in Chapter 4.7, Hazards and Hazardous Materials, as well as Chapter 4.10, Noise and Vibration, of the DEIR. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project, including consistency with all applicable regulations regarding blasting.

Response to Comment Ind 263-12

The comment expresses a general opinion that the plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant, but does not provide specific examples that would allow for a detailed response. In addition, it is unclear what plan the commenter is referring to. As discussed in Chapter 4.4, Biological Resources, the DEIR sets forth mitigation measures to reduce the severity level of all identified impacts to less than significant.

Response to Comment Ind 263-13

Please see Master Response 17 – Meteorological Data Used in HRA.

Individual Letter 264

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: GARY EMANUEL

Address: 151 RUBY LEDGE CT.

Organization (if applicable): MINE WATCH

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 264-1

The Board of Supervisors needs to require Bonds to ensure that future requirements are met. The applicant has a history of failure.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 264: GARY EMANUEL

Response to Comment Ind 264-1

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 265

I support re-opening the Idaho-Maryland

Nevada County is in tremendous need of new [illegible] provide a strong economic future [illegible] for decades t[illegible] Valley's plan to [illegible] and environmentally sensitive [illegible] our natural environment while creating ove[illegible] once-in-a-generation opportunity to revita[illegible]e our [illegible]al ec[illegible]

Re-opening [illegible]e mi[illegible] means over 300 n[illegible] [illegible]es in [illegible] with an av[illegible]age [illegible]xpected annual earni[illegible] [illegible]ore than $[illegible]2, [illegible] min[illegible] will also spur an additional 3[illegible] jobs thro[illegible]gh re[illegible] [illegible]ea. Th[illegible] project will enhance the pr[illegible] and confidence of Ne[illegible] and t[illegible] families [illegible] help build stable and pros[illegible]

Opportunities like this come al[illegible]. Rise Grass Valley ha[illegible] innovative project f[illegible] County. I urge the Board of Sup[illegible] officials t[illegible] start our local economy by strongly supportin[illegible] [illegible]aryland Mine.

NO MI

Name(s) GARY & CHRISTINE G

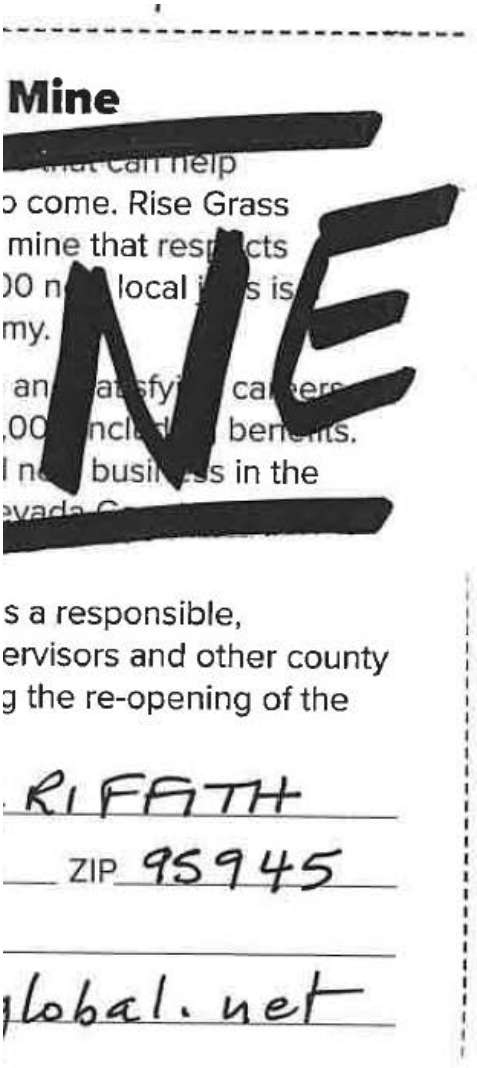
Address 11010 Gold Hill Drive

Phone

Email Address griffith_nys@sbcg

Ind 265-1

Dist 3



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INDIVIDUAL LETTER 265: GARY AND CHRISTINE GRIFFITH

Response to Comment Ind 265-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 266

Nevada County Planning Commission
& Nevada County Board of Supervisors

Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
matt.kelley@co.nevada.ca.us

3/30/2022

Comments on the draft Environmental Report for the proposed Idaho-Maryland Mine

Thank you for the opportunity to comment on the adequacy of this long, complex document. My wife, Christine & I have been residents of Nevada County at 11010 Gold Hill Drive for 23 years, working locally as teachers at the Nevada City School of the Arts. Our neighborhood is directly adjacent to the Empire Mine Historical State Park, situated on the ridge that ends at the Brunswick site and stands opposite the Centennial site discussed in the proposal. We are less than a ¼ mile away from the mineral rights boundary of this project, ½ mile from the Centennial site and just under a mile from the Brunswick site. So, it is fair to say that this proposed project is right in our backyard.

Ind 266-1

During our years living here, we have become very familiar with the 'Area of Projected Impact' that the proposed mine would operate within. We walk and ride in the 'Union Hill' portion of the state park. We visit the meadow that encloses the South Fork of Wolf Creek at all seasons, even skiing there after the occasional heavy snow storm. My daughter grew up going to that creek, in the forested section of the state park upstream of the meadow and downstream of the Brunswick site, a place we can walk to from our house. We frequently drive East Bennett, Brunswick, Idaho-Maryland and Whispering Pine roads making errands or visiting friends. 18 years ago I began monitoring the water quality of South Fork Wolf Creek, for its turbidity, its flow, its nitrates, pH, TDS and dissolved oxygen, walking reaches of the stream, documenting its sinuosity of flow, its diverse flora and its wildlife. I've worked with the state park on restoration projects in the meadow, taken students from my 5th Grade class there, to sketch, measure, observe, and cut back blackberry thickets. All this area close to me is home in an intimate,

shared way. Neighbors meet on the trails and compare notes about the latest bear sightings or the arrival of spring migrating birds. People walk their dogs or help an elderly relative up and down the forested hill at the end of our street. Taken together, we all feel how precious and irreplaceable this area is, aesthetically, for our health, and for the forest, stream and meadow species that inhabit them.

It is with this eye that I read the DEIR, with my science teacher and naturalist background, but really as a long-term resident who calls the wider area where we walk, ride and travel daily our home. And how does the DEIR fare in that analysis? As a complex, intensely technical document that somehow in spite of its many pages repeatedly does its best to ignore or downplay many of the potential impacts that could hinder its proposed project.

Here are some of the ways in which the DEIR feels inadequate:

Ind 266-2

1) Cultural and Tribal Resources. Although the chapter in the DEIR states that letters were sent to tribal groups without response and that no archeological survey was considered necessary, it is well-known locally that the 'area of potential impact' as delineated in chapter 5 contains both sites of cultural significance and archeological sites important to the Nisenan people. I know of two bedrock mortars (grinding rocks) within the Bennett Street Grassland area. They are also known to the State Park and many of the people who visit that part of the South Fork. If one walks over to the bus stop in downtown Grass Valley there are large public displays about Wolf Creek, one of which shows Nisenan village sites, shared in consultation with the local Nisenan, one on the main stem of Wolf Creek near the Centennial site, the other on South Fork Wolf Creek, somewhere close to the Brunswick site. Other traditional and archeological sites doubtless exist in the area. Yet the DEIR is not successful in finding any. Wolf Creek Community Alliance has had a working relationship with the Nevada City Rancheria Nisenan Tribe for years and have collaborated with them on a number of projects. To say that they did not respond to an email or letter is not enough, especially when it is common, public knowledge that tribal resources exist in the area. The DEIR needs to include archeological surveys of the two sites and the area of projected impact. The DEIR also needs to include full consultation with indigenous tribes.

Ind 266-3 2) Aesthetics — The draft does little to account for the importance of recreation and the impact the project would have on that. Many of the trails in the state park are very much in the 'airshed' or 'viewshed' of the two project sites. The DEIR doesn't address seriously the aesthetic

Ind 266-4 impact to state park visitors or to the many in neighborhoods who regularly take informal trails in the area, listen to birds, or exercise. The

Ind 266-5 DEIR should look not just at scenic vistas, but also visual and noise impacts and its impact on park visitors or neighbors given that the area of projected impact is a crucial recreational area for the community.

3) Related to this is Noise. The ridge-top on which many of the "Union Hill' trails in the state park are located are elevated above or at a height equal to the two proposed mine sites. The analysis of noise doesn't appear to take that into account or measure impacts from those elevated locations. My house, for example, being right on Gold Hill Drive, following the top of the ridge, makes it so that we hear very

Ind 266-6 clearly any of the extra-loud noises of the surrounding area. The noises that stand out, such as the work at the Loma Rica development right now, or the roar of a motorcycle going up Hwy 20, do not fade into the background. They disrupt one's attention, and if frequent enough annoy and actually lessen our well-being. That mine noise will somehow be less than the noise background is now, makes no sense. The DEIR should better analyze the presence and frequency of distracting noises that cut through the background. Yes, the DEIR admits this will be a

Ind 266-7 significant issue during construction - which, by the way, seems quite serious as it is projected to last somewhere between six months and two years. There should be something in the DEIR that limits or penalizes the applicant if their 'significant and unavoidable' construction

Ind 266-8 noise goes on past a certain timeline.Beyond that, the DEIR should discuss limiting the permitted hours for this noise to match neighborhood patterns, for example, stopping operational noise after 5

Ind 266-9 pm. Further, the idea that mining operation noise would be just below the level of annoyance or somehow under what county ordinance permits is offensive in that it doesn't address the cumulative impact of day to day, yearlong, decade-long noise levels. At one point in the

Ind 266-10 Biological Resources section the draft suggests that birds subjected to the constant noise will be able to 'adapt.' Humans in the area of the mine shouldn't be judged in that way and told that there will be no significant impact, or that they can adapt to the increases. The DEIR

needs a more detailed, human-oriented analysis of noise impacts that doesn't just apply to ordinances and overall sound levels.

4) Biological Resources. The biological surveys in the DEIR are incomplete and need to be redone. Surveys for plants are done out of blooming season for species of special concern. Surveys for amphibians are based on single walks down streams. Deer are not observed and so their movement through the area as well as their fawning or feeding areas are not accounted for. The biological richness of the area in many ways is better known by locals than by the surveyors, who seem mostly intent on NOT finding species of special concern that might hinder the project.

Ind 266-11

The same can be said for the description and characterization of the South Fork Wolf Creek. I have monitored the stream for 18 years for Wolf Creek Community Alliance. The South Fork is a perennial stream starting above Brunswick Road. Trout have been observed from that point above Brunswick through a number of stream reaches, including the Bennett Street Grassland reach, all the way to its confluence with Wolf Creek. Although obviously disturbed and degraded in sections (mostly by previous mining!) in the two sections that run through the state park there is a great diversity and richness of species. Stately old madrones, alders, ash, native walnut, cottonwood and douglas fir grow along the banks, along with the uncommon pacific yew. Birds are abundant, and well-documented by the Gold Country Avian Society bird banding project at the Grassland. The benthic Macroinvertebrate (BMI) collections done in the South Fork by Wolf Creek Community Alliance (WCCA) have consistently scored the highest in richness and abundance of sensitive species compared to any other sites tested in the watershed. Yet, the DEIR doesn't include any hydrological data for the forest reach of the South Fork where WCCA has its monitoring site.

Ind 266-12

The biological memo for South Fork doesn't include any survey of the grassland reach. And not a single survey of BMI is done to create a baseline for stream aquatic ecology health. This is the stream the project proposes to flood with treated mine water for 80 years. The DEIR should include much more biological analysis for the stream, starting with a baseline of biological conditions along the whole creek, from its headwaters above Brunswick Road down through the grassland reach. Surveys should be thorough and undertaken at the correct seasons, for blooming, breeding and nesting. Trail cameras should record movement of animals, such as the deer the DEIR doesn't

Ind 266-13

Ind 266-14

Ind 266-15

Ind 266-16

Ind 266-17 observe, in order to understand the real extent of the biological resources potentially impacted by the project. Actual noise data that relates to impacts to birds and other species needs to be done, not

Ind 266-18 simply reference to selected studies that create a biased picture of minimal impacts. The lack of effort in these regards is really appalling.

5) Related to possible impacts to streams due to the proposed project is, of course, the bigger question of water impacts themselves. Although the hydrological chapter goes to great length to attempt to show that a

Ind 266-19 zone of low transmissivity exists below a certain depth and that well water levels have not varied much from dry to wet season, and that the fractured rock below ground is uniform enough to predict very low drawdowns of groundwater, none of the analysis is very convincing. The DEIR needs to more honestly factor in uncertainty. It needs to do water

Ind 266-20 samples in other locations than the Brunswick Mine Shaft to get a better picture of the chemical composition of water underground. It needs to

Ind 266-21 sample more wells over a longer period of time. And all of its conclusions need to be re-considered in the context of an 80 year

Ind 266-22 period (how can a permit of such length be granted?) which is predicted to see increased wildfire, increased periods of drought, and increased episodes of extreme weather events. Water is life, especially in California. NID, our local water agency is currently undertaking an overall review of its water supply and water delivery for the future, with a very active concern for its ability to continue to supply water into the

Ind 266-23 future due to both climate change and increasingly impactful new regulations guaranteeing delta stream flows downstream and applying water rights to groundwater. The DEIR doesn't include any of these crucial considerations. In this sense the DEIR is not just inadequate. It is actually dangerous. It endangers our water security by ignoring future impacts. A full analysis of these future impacts needs to be included.

6) Traffic. The report states that traffic impacts would be significant and unavoidable at one intersection. That is impact enough. Reading the chapter on traffic, however, I feel that other significant impacts are not

Ind 266-24 sufficiently discounted. I find the many abstract intersection charts and calculations to be divorced from my everyday experience as a driver. How many trucks will I encounter on average driving to do errands or other trips? How will the roads themselves be impacted due to the 100 truck trips a day? How will it feel on Whispering Pine after it has been widened to accommodate the daily truck traffic heading to the

Centennial site to dump mine rock? My sense is that there would be significant impacts on all the roads locally that RiseGold would use for transporting hazardous materials, for refueling, for conveying waste mine rock, or even due to employee trips on the roads. The DEIR needs to go beyond the very technical intersection studies to show what impacts there would be not in terms of technical attainment numbers, but in terms of community driver experience. How much longer will it take to get to our destinations due to the increased traffic? How often will we be sitting behind trucks smelling their fumes?

Ind 266-25 Related to this are two critical questions I also don't see addressed satisfactory in the DEIR. The first is infrastructure. Yes, the applicant will pay their fair share of road improvements, but how much additional maintenance and repair will be needed due to 80 years of heavy truck use and will the applicant be required to pay for it? Even if payment is guaranteed, we are still talking about extensive traffic delays over long periods of time, both for initial road realignments and needed repair and maintenance. Generally, I feel that 80 years of increased traffic as described would have significant impacts on road infrastructure and I don't see that fully addressed. In this regard

Ind 266-26 cumulative impacts including increased residential development at the the approved Loma Rica project, the proposed Pine Hill project on East Bennett, and doubtless others over the 80 years lifetime of the project need to be considered. Detailed analysis of the cumulative impacts of all this needs to be included.

Ind 266-27 Finally, there is the crucial question of evacuate routes. This needs to be carefully studied and not simply dismissed as insignificant. Everyone living here locally is acutely aware of their primary and secondary evacuation routes and recognize this as a matter of life and death. Additional traffic on roads, or bottle-necks can lead to situations where people are stuck on the roadway in the path of an approaching fire. Careful study and analysis of the slowdowns and bottle-necks potentially caused by truck traffic on-route and employee evacuation needs to be presented in the DEIR. These scenarios should also include situations where trucks carrying hazardous or explosive materials are involved.

Ind 266-28 7) Health and Hazards. The DEIR includes many mitigations that promise to reduce health issues and hazards to "less than significant" levels. The DEIR should analyze those mitigations more thoroughly, instead of simply stating that permits or regulations will be followed.

Ind 266-29 More explanation of those mitigation plans should be included IN the report, not promised for later. Additional monitoring, tables for fines, and

Ind 266-30 triggers for operation shut-down should be included. Specific funding

Ind 266-31 analysis to ensure that all this is made possible should be identified.

Ind 266-32 Mechanisms allowing for public access to real-time data analyzing water and air quality, sampling for asbestos and silica should be

Ind 266-33 detailed in the DEIR. Tracking of hazardous materials should also be included. As a citizen, I start with a skeptical view of any industries

Ind 266-34 ability to eliminate or safeguard against health hazards. The DEIR is not convincing in eliminating that skepticism. Much more additional description of proposed measures, along with additional ones, is needed in order for any of us to feel safe living close to this proposed mine.

Ind 266-35 8) Energy and Greenhouse Gas impacts. Climate change is an existential crisis for the whole planet. Our national government, the state and our county have all created goals for meeting that challenge. Fundamentally that included less burning of fossil fuels and lower energy use. Yet the applicants proposal would significantly increase both of these. The goals set forth in Nevada County's Energy Action Plan would be severely undermined. Yet the DEIR does not mention this or see it as a problem. The DEIR needs to address this. Buying carbon offsets does nothing to solve that problem. Also, the very calculation for

Ind 266-36 GHG emissions and offsets needs to be re-examined. Do calculations take into account all sources of emissions, including those caused by the creation of materials needed for the project? Do calculations

Ind 266-37 underestimate the GHG impact of various mine activities. In independent review is needed here. In any case, purchasing carbon offset credits should be be seen as adequately addressing state goals

Ind 266-38 of reducing not just offsetting emissions. The country, in its assessment of this project needs to take seriously the impacts large industrial projects such as the once proposed here would have on combating climate change. This DEIR does not do this.

Ind 266-39 9) Cumulative Impacts. Last, but hardly least, I continually come up against the absurdity of a project with so many potential impacts being permitted for 80 years. We are talking about the year 2102, or later, a period of four generations, the 22nd century, a time of significant unknowns. As a county it should be prudent to only consider a permit of much shorter length. 5 years to see if the applicant can follow through

on its many commitments to mitigate impacts. Perhaps 10 years or 20 at the outside. I read that the applicant needs an 80 year permit to prove profitability. That really should not affect the communities reasonable need to protect itself against the many probable or unforeseen impacts this project could have in spite of the most optimistically written EIR. That really should not cause us to state that, given the predicted increases in drought, wildfire and extreme weather events, an 80 year permit is unacceptable, unacceptable because it involves too much risk of too much impact. The DEIR appears to think that little if anything will change in 80 years and does not consider the dramatic changes that science, that government predicts. The DEIR needs to fully address the potential impact involved in permitting a project for 80 years. It should analyze the cumulative nature of impacts that project could cause in 20 years, 40 years, 60 years, 80 years, and consider alternative versions of the project that are not longer (!) as one of the 4 alternatives suggests, but SHORTER.

Ind 266-40

Dear planning commission and board of supervisors. Clearly, this proposal if approved in any fashion would have profound impacts on our country. I ask that you task the reviewers and writers of this DEIR to improve its analysis, include missing elements that should be included, and seriously rather than minimally address the real potential impacts of the project. Thank you for your time and your work to keep the community I live in a beautiful, healthy place to live, for all of us and our children's children's children.

Sincerely,

Gary Griffith
11010 Gold Hill Drive
Grass Valley, CA 95945
Nevada County

INDIVIDUAL LETTER 266: GARY GRIFFITH

Response to Comment Ind 266-1
Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project, but has been forwarded to the decisionmakers.

Response to Comment Ind 266-2
Please see responses to Group Letter 14. In addition, as noted in DEIR section 4.5.4, and Appendix G, a Historic Properties Inventory and Finding of Effect report included a cultural records search, literature review, consultation with the Nevada County Landmark Commission, consultation with the NAHC, and a field survey. The commenter mentions two tribal resources that are not on the project site, and would not be impacted by the project.

Response to Comment Ind 266-3
The comment infers that use of parks, public lands, and trails in the area may be impacted because users will see impacts on the views from these publicly available facilities. The commenter does not identify any trails, public facilities or lands or parks located in the vicinity of the project site, or any that may be impacted by the project. The nearest trail to the project area is the Loma Rica Trail running north-south along Brunswick Road from Loma Rica Drive north to Bubbling Wells Road; additionally, the edge of Empire Mine SHP is approximately 850 feet from the boundary of the Brunswick Site. (DEIR p. 4.11-8.) However, the distance from that nearest trail to the proposed project's noise-generating operations within the Brunswick Site is over 2,500 feet. The nearest trail within the Empire Mine SHP is nearly half a mile, or approximately 2,250 feet, from the nearest proposed noise-generating activities within the Centennial Site. The project site is surrounded by undeveloped forested land, industrial, rural residential development and commercial uses. (DEIR p. 4.1-1; see also Table 3-2.) As part of the Aesthetics Technical Study, public viewer groups and vantage points from the surrounding area were considered to assess how the public would perceive changes in site conditions associated with the proposed project. The vantage points include public views considered to be the most visually sensitive locations. The commenter does not name any park, trail or public land that has a view of the project site. None of the parks or trails in the general vicinity of the project have line-of-sight to either the project site or any anticipated project operations, and the views from any of the listed facilities would not be impacted by the project. (DEIR p. 4.11-8)

Response to Comment Ind 266-4
Please see Master Response 1 – Non-EIR/ Administrative and Master Response 2 – Social and Economic Impacts, regarding quality of life concerns.

Response to Comment Ind 266-5
Please see Response to Comment Ind 266-3 above regarding aesthetics impacts to user of trails and park visitors.

The comment infers that use of parks, public lands, hiking, equestrian and mountain biking trails in the area may be impacted by noise. The commenter does not identify any trails, public facilities or lands or parks located in the vicinity of the project site, or any that may be impacted by the project. The nearest trail to the project area is the Loma Rica Trail running north-south along Brunswick Road from Loma Rica Drive north to Bubbling Wells Road, additionally, the edge of Empire Mine SHP is approximately 850 feet from the boundary of the Brunswick Site. (DEIR p. 4.11-8.) However, the distance from that nearest trail to the proposed project's noise-generating operations within the Brunswick Site is over 2,500 feet. The nearest trail within the Empire Mine

SHP is nearly half a mile, or approximately 2,250 feet, from the nearest proposed noise-generating activities within the Centennial Site. The DEIR analyzed other sensitive receptors located much closer to the noise-generating aspects of the proposed project than the State Park; and these closer receptors were determined to be less than significantly impacted by project noise generation. Accordingly, more distant receptors, including the Empire Mine SHP trail network, or the Loma Rica Trail would similarly be less than significantly impacted by project noise generation. The Loma Rica Trial runs near the County airport and would be much more impacted by the noise from air traffic and the nearby industrial park than the project. DEIR Figures 4.10-7 and 4.10-8 show that both daytime and nighttime noise generation of operations at the Brunswick Site would be well below 40 dBA at the Empire Mine site. DEIR Table 4.10-4 (General Plan Noise Element Exterior Noise Limits) shows that the County's noise standard applicable to recreation use is 70 dBA Leq during the hours in which the park would be open to the public (i.e., 7 am - 7 pm). As such, the project's noise level of less than 40 dBA at the park site from Brunswick operations would be more than 30 dBA ***below*** the County's noise standard applicable to recreation uses. At the portions of the Empire Mine SHP nearest to the Centennial Site, predicted daytime noise levels are 27 dBA at the grasslands and 22 dBA at the nearest trail within the park. (DEIR Figures 4.10-7 and 4.10-8.) The noise levels at both locations are well below the County's 70 dBA daytime noise level standard. As a result, the Empire Mine SHP and the Loma Rica Trail, which are the only public recreational facilities somewhat near the project site, would not be adversely impacted by noise from operations at the Centennial Site.

Response to Comment Ind 266-6

As discussed on page 5 of the project's Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility is not used as a significance criteria in evaluating noise impacts. In addition, a noise source can be audible without a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

The noise prediction model used to quantify the transmission of sound from the project area to the surrounding areas accounts for topography, atmospheric conditions, ground cover, shielding by intervening buildings, noise attenuation provided by building walls and ceilings, and vegetation (see pages 5-7 of DEIR Appendix L). Local topographic survey data was imported to develop a 3-dimensional model of not only the project site but the surrounding neighborhoods as well. (DEIR 4.10-23.) Accordingly, contrary to the commenter's assertion, the sound analysis did take into account topographical variation such as the referenced ridge top. Reverberation (echo) can occur when sound impacts a reflective surface. However, vegetated ground with extensive tree cover, such as that present in the project vicinity, tends to be acoustically absorptive rather than reflective. (DEIR 4.10-24.) Where sounds can be heard over long distances, that phenomenon is frequently attributable to either a lack of intervening topography, vegetation, and ground cover between the source and receiver, or atmospheric conditions conducive to sound propagation. Such conditions are not anticipated to occur due to reflections or echoes at locations with soft ground, irregular topography, and extensive tree cover.

Response to Comment Ind 266-7

The significant and unavoidable construction noise impact is limited to receptors proximate to the East Bennett Road water pipeline construction area. The DEIR made the reasonable assumption that these limited construction activities would be complete within approximately 6 months. The County is not required to speculate as to whether potable water pipeline construction would extend beyond these reasonable estimates. Nevertheless, the comment has been forwarded to the decisionmakers.

Response to Comment Ind 266-8

The comment is unclear but appears to suggest that project operational noise should stop at 5pm. The commenter's request is noted and has been forwarded to the decisionmakers. The requested hours of operation, as noted in Table 3-7 of the DEIR, have been evaluated in this DEIR, and potential effects of such operational hours are evaluated throughout the technical chapters of the DEIR. For example, Chapter 4.10, Noise and Vibration, found that the project's operational noise would be below applicable County noise standards, using reasonable assumptions. Nevertheless, out of an abundance of caution, DEIR Mitigation Measure 4.10-3.2 requires implementation of a comprehensive noise monitoring program to ensure that the project's noise levels satisfy the County's noise standards once the project is operational and monitoring can be conducted. Specifically, the measure requires the following: "A comprehensive noise survey shall be conducted of each facet of the operation to both verify the modelling assumptions of the project noise analysis…and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors…If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc.". The noise monitoring measurements will provide a safeguard for the residents, the County and the applicant in ensuring the project's noise generation will be maintained at acceptable levels.

Response to Comment Ind 266-9

Please see Response to Comment Ind 266-8 above.

Response to Comment Ind 266-10

Please see Response to Comment Ind 266-8.

Response to Comment Ind 266-11

Please see Master Response 30 – Biological Technical Study Adequacy, Master Response 31 – Rare Plant Surveys, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog regarding surveys conducted, timing, and peer review.

Migration corridors, including deer migration, was analyzed in DEIR Impact 4.4-4.

Response to Comment Ind 266-12

The DEIR contains voluminous baseline surface water quality data. The baseline surface water quality data are described within Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the

former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location.

Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek, measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a "qualifying rain event of 1.25 inches, and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR.

Further analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 of the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19 while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18.

Please also see Master Response 36 – F lows in South Fork Wolf Creek, Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 34 – Resident Fish, and Master Response 32 – Temperature of Mine Water Discharge. Regarding benthic macroinvertebrates, please see Response to Comment Grp 31-12.

Response to Comment Ind 266-13

The commenter does not specifically state which biological technical study should have a "survey of the grassland reach." Significant biological analysis of the project site and surrounding area was conducted to prepared DEIR Chapter 4.4. Please see Master Response 30 – Biological Technical Study Adequacy and Response to Comment Grp 31-12 regarding BMI.

Response to Comment Ind 266-14

Please see Master Response 36 – Flows in South Fork Wolf Creek, Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 32 – Temperature of Mine Water Discharge describing groundwater treatment and discharge into South Fork Wolf Creek.

Response to Comment Ind 266-15

The biological study included surveys of the project site, offsite surveys where applicable, local professional expertise, and review of various databases to generate data sufficient to understand potential biological impacts. Areas that will not be impacted by a project do not need to be surveyed just because they are somehow "connected" to the property unless there is a potential for the project to impact that resource. Please see Master Response 30 – Biological Technical Study Adequacy and responses to Group Letter 2.

Response to Comment Ind 266-16

Please see Master Response 30 – Biological Technical Study Adequacy, Master Response 31 – Rare Plants, and Master Response 37 – Birds and Raptors.

Response to Comment Ind 266-17

The commenter states that trail cameras should be used to observe movement of animals such as deer. The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish

species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it would be less than significant.

Response to Comment Ind 266-18

As discussed in DEIR section 4.10.2, ambient noise monitoring was conducted at twelve locations surrounding the project site (see Figure 4.10-2). The results of the noise monitoring were presented in Table 4.10-1. The commenter provides no information why the noise monitoring conducted for this project, which documents ambient conditions, should differ for animals. DEIR impact 4.4-2, subsection Wildlife Disturbance, addressed potential noise and nighttime lighting impacts on wildlife populations and found the potential impact less than significant.

Response to Comment Ind 266-19

The hydrology analysis presented in the DEIR was prepared by a qualified expert and peer reviewed by the County's own independent hydrogeological expert. Please see Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 266-20

Please see Response to Comment Ind 266-12 above.

Response to Comment Ind 266-21

Please see Response to Comment Ind 266-12 above. In addition, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 266-22

The comment appears to request additional analysis regarding future conditions as a result of climate change. Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 266-23

The commenter asserts that the DEIR should analyze the changing environment due to climate change and future regulations regarding delta stream flows. Please see Chapter 4.8 and Appendix N of the DEIR and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 266-24

Comment noted. DEIR Chapter 4.12 is primarily based on the Traffic Impact Analysis (TIA) prepared for the proposed project (see Appendix O). The TIA's methodology, intersection and road segments for analysis, and significance criteria were appropriately based on Nevada County, City of Grass Valley, and CalTrans guidance. The commenter does not identify any specific issues with the traffic analysis as presented in the DEIR.

Response to Comment Ind 266-25

As required under Mitigation Measure 4.12-6(g), the applicant is required to enter into road maintenance agreements with both Nevada County and the City of Grass Valley. The TIA analyzed seven different level of service scenarios, including three related to future cumulative conditions. These scenarios included cumulative no project, cumulative plus project (scenario #1), and cumulative plus project (scenario #2). These scenarios account for reasonably foreseeable future growth and are described in DEIR section 4.12.4 and Impact 4.12-9.

Response to Comment Ind 266-26

A detailed analysis of cumulative impacts is provided throughout the technical chapters of the DEIR. Please refer to Chapter 5, Statutorily Required Sections, for a map (Figure 5-1) and list of projects included in the cumulative scenario, pursuant to CEQA Guidelines Section 15130.

Response to Comment Ind 266-27

Please see Master Response 5 – Evacuation Routes.

Response to Comment Ind 266-28

Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (CCR Title 14 Section 15126.4).

Response to Comment Ind 266-29

Please see Response to Comment Ind 266-28 above.

Response to Comment Ind 266-30

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 266-31

CEQA requires an analysis of the project's impact to the environment. An analysis of the Applicant's financial feasibility is not required by CEQA. Please see Master Response 1 – Non-EIR/ Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 266-32

Any compliance documents associated with permit monitoring and submitted to the appliable agency will be considered a public record and available to the public for review.

Response to Comment Ind 266-33

DEIR Chapter 4.7 analyzed potential hazardous materials impacts associated with the project. As outlined in DEIR section 4.7.3, the County Environmental Health Department is responsible for County programs regulating the storing and handling of hazardous materials. As stated in DEIR section 4.7.3, the County's hazardous material program includes:

> "regulating hazardous materials business plans and chemical inventory, hazardous materials storage, hazardous materials management plans, and risk management plans. The hazardous materials business plan program requires businesses in Nevada County to prepare plans detailing facility information, a hazardous materials inventory, and an emergency response plan if hazardous materials storage equals or exceeds minimum reportable quantities."

Mitigation Measure 4.7-1(d) requires the applicant to submit a hazardous business plan to the County for review and approval prior to any transport, storage, or use of hazardous materials.

Response to Comment Ind 266-34

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

Response to Comment Ind 266-35

Please see Master Response 25 – Nevada County Energy Action Plan, regarding the project's consistency with this plan.

Please also see Master Response 27 – Greenhouse Gas Thresholds, Master Response 28 – Greenhouse Gas Credits, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 266-36

Please see Response to Comment Ind 266-35 above.

Response to Comment Ind 266-37

The air quality and greenhouse gas analysis was independently reviewed by the County environmental consultant prior to preparation of the DEIR.

Contrary to the commenters assertion, Mitigation Measure 4.3-7(b) requires the project to retire carbon offsets in a quantity sufficient to offset the project's greenhouse gas emissions to a less than significant level. Please see Master Response 27 – Greenhouse Gas Thresholds, and Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 266-38

The DEIR does address climate change, without entering in speculation, and the context of the project and the County relating to the global impact. (see DEIR Chapter 4.3.)

Response to Comment Ind 266-39

As identified in CEQA Guidelines section 15125, the environmental analysis presented in the DEIR should normally compare physical environmental conditions as they exist at the time of the Notice of Preparation. The DEIR analyzed the project's potential impacts consistent with this requirement in addition to reviewing potentially significant cumulative impacts based on known or planned development in the region. CEQA Guidelines section 15130 requires an EIR discuss cumulative impacts of a proposed project. Cumulative impacts are considered impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis includes an analysis of cumulative impacts specific to that resource.

Response to Comment Ind 266-40

The comment generally expresses concerns related to the project and the DEIR, and has been forwarded to the decisionmakers for their consideration.

Individual Letter 267

From: ghp2013@gmail.com
Sent: Friday, April 1, 2022 3:07 PM
To: Idaho MMEIR
Subject: Mine Environmental Impact Comments

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Please enter the following comments for the record:

Ind 267-1 The draft Environmental Impact Report does not sufficiently address the risks related to hydrology in the immediate area of the mine. The geology in the area is known for numerous random (and unmapped) fractures in to local bedrock. Without a detailed knowledge of these fractures, the consequences of de-watering the Idaho-Maryland Mine cannot be known.

Ind 267-2 Within a 5-mile radius of the mine, many houses are dependent on family-owned water wells. The proposed de-watering of the mine could easily result in the inadvertent reduction of the water table or the complete dewatering of water wells on surrounding properties.

Although the project proposes to provide NID as an alternative source in this event, this is insufficient. The quality of NID water is inferior to family wells in this area. And, furthermore building the infrastructure required to distribute NID water in this area would be very costly and difficult. Many residences are located away from main roads, along unimproved private roads. Such an installation of NID water service would present numerous legal issues, destructive of private property and in some cases completely impractical.

Ind 267-3 We respectfully request that this EIR be rejected.

Sincerely,

GARY and TINA SPRIGGS
13480 Lower Anchor Ln
Grass Valley CA 95945
Ghp2013@gmail.com

1

INDIVIDUAL LETTER 267: GARY AND TINA SPRIGGS

Response to Comment Ind 267-1

The commenter states that the DEIR does not sufficiently address impacts to groundwater because there are random and unmapped fractures. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 267-2

The commenter states that the project will adversely affect private wells but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), Master Response 7 – Location of Future Mining Areas, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 267-3

The commenter states that the provision of NID water is inadequate because NID water is inferior to private well water but provides no evidence to substantiate this claim. The commenter also states that extending NID service to properties near the project is impractical. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), Master Response 7 – Location of Future Mining Areas, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

The Well Mitigation Plan (Appendix K.9 of the DEIR) has been modified and is attached to the Final EIR as Appendix D. More detail on actions and potential mitigations, is provided in the modified Well Mitigation Plan and mitigation of wells outside the E. Bennett area may not include a connection to NID potable water supply.

Drinking water supplied to Nevada Irrigation District (NID) customers meets and exceeds state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. (see https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf)

Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume V of IX
(Chapter 2 *Continued*)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Individual Letter 268

1

DRAFT EIR EMAIL COMMENTS –

Proposed Idaho-Maryland Mine (DEIR).

April 4, 2022

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us

GENERAL COMMENTS on the DEIR and the Proposal from Gary Zimmerman of Nevada City, CA:

Thank you for the opportunity to **comment on the DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the proposed re-opening of the now closed Idaho-Maryland Mine and Toxic Superfund Waste Site.**

Ind 268-1

From my experience reviewing and commenting on a number of environmental impact reports, as well as the economic impacts of a number of proposed projects over the past four decades, I would like to provide comments on the DEIR and the associated proposed project.

- ✓ **I would like to begin with comments on several general aspects of this DEIR, which is clearly incomplete and inadequate, and likely will end up in court.**

GENERAL OBSERVATIONS:

Ind 268-2

- ✓ **CLIMATE CONCERNS: This one proposed project would consumer about 1/8th of the county's current energy consumption and generate ADDITIONAL GREENHOUSE GAS EMISSIONS that would offset existing County Efforts to REDUCE EMISSIONS. Straining Nevada County's power grid and spiking greenhouse gas emissions and worsening air quality ARE SIGNIFICANT ADVERSE IMPACTS!**

Ind 268-3

- ✓ **BLASTING UNDERGROUND & IMPACTS on TECH FIRMS ABOVE GROUND -- ECONOMIC LOSSES: My recollection was that this was an important adverse impact from the failed effort to reopen the Idaho-Maryland Mine in the 2005-2012 time frame. Is there a proposed estimate of the potential costs to existing "above ground" tech firms of product losses related to vibrations caused by proposed continuous underground blasting if the mine were to be reopened?**

Ind 268-4

- ✓ **If not, why not? If so, when will it be available to Grass Valley and Nevada County businesses, governments, and the public?**

Ind 268-5

- ✓ **CENTENNIAL SITE: This site is ALREADY A TOXIC "SUPERFUND" SITE, WAS IT SUPPOSED TO BE CLEANED UP FIRST by Rise Gold?**
  Has Rise Gold developed a clean up plan? Implemented a clean up plan? Paid to begin the clean up? If not, why not?

Ind 268-6

✓ **WILL THE PROPOSED MINE PAY FOR THE EXISTING CLEAN UP, OR WILL IT "FAIL" AND LEAVE OTHERS (GOVERNMENTS AND TAX PAYERS) TO PAY FOR THE CLEAN UP?**
How can Nevada County protect itself from the RISK that FAILURE or EARLY CLOSURE results in "Others" paying for the proposed Rise Gold clean up(s)?

Ind 268-7

✓ **NOTE: RISE GOLD bought this property knowing that it included nearly 270,000 cubic yards of mine tailings that include a variety of toxics that should be cleaned up…**
Has the applicant made a good faith effort to begin the toxic superfund site clean up on the Centennial parcel? What is the cost of the clean up of existing toxics on the site? The annual cost of clean up associated with proposed annual operations?

Ind 268-8

✓ **ASBESTOS: SERPENTINE ROCK, common in Nevada County and closed mines, often contain asbestos.** **Is the type(s) of asbestos found in the Idaho-Maryland mine tailings considered a toxic waste today? What is the typical asbestos content of the mine tailings that would be produced by the proposed reopening of the mine? What are the annual costs of cleaning up the existing mine tailings, and their asbestos content, and the costs of cleaning up additional "new" mine tailings that would be located on the proposed mine site?**

Ind 268-9

✓ **ECONOMIC BENEFITS: HAS THE PROPOSED ECONOMIC IMPACT STATEMENT BEEN PREPARED, BEEN AVAILABLE FOR PUBLIC COMMENT, INCLUDING FROM Financial Analysts, Accountants, and Economists? Has it been reviewed for accuracy by Nevada County officials?**

Ind 268-10

✓ **ECONOMIC IMPACTS: WHAT ARE THE ECONOMIC COSTS, in lost property values arising lost or contaminated wells, from close proximity to an active mine site, toxic waste tailings, noise, traffic, air and water quality?**

Ind 268-11

✓ **FALLING PRPERTY VALUES, both private homes and local businesses operating near or in the vicinity of the toxic sites, and properties losing property rights to their groundwater, also likely will impact Nevada County property tax assessments and property tax receipts. ,Overtime, or in event that the proposed mine fails or is closed before the 80-year timeframe is completed, these costs will be CUMULATIVE and could be SUBSTANTIAL!**

Ind 268-12

✓ **Have these costs to individuals, businesses, and governmental organizations like Nevada County, school districts, special districts, NID, been evaluated in the DEIR? Have the proposed project proponents offered to provide mitigation or compensation (and for how long?) to those who will suffer damage and lost property values and tax receipts as a result of reopening this mine, that will require mitigations and expensive treatment of toxics into perpetuity? IF not, why not, and when will this analysis be provided to Grass Valley neighbors and officials?**

Ind 268-13

✓ **MARKET RISK: PRICE of GOLD? Aside from the many other RISKS associated with the proposed mine reopening, is the price of gold. The potential success or failure of this proposed project, from the standpoint of the firm, may depend on the price of gold on the global market. Please note that gold prices have a history of moving, both up & down, with a longer-term upwards trend. The downward movements, like during the 2008 Financial Crisis, create another RISK, that a fall in the price of gold also could cause a failure of the proposed mine operations. For example, note the substantial fall in gold prices from the 2012 peak through 2016. Sales of gold stocks by central banks in a financial emergency or crisis also could dramatically lower the market price of gold for other uses.**

Ind 268-14

✓ **FAILURE or CLOSING (well before 80 years…)**
The price of gold is high now, but that does not guarantee that it will remain high forever. How might higher and rising interest rates, anticipated in the years ahead, also make non-interest paying (but including costs of gold storage) gold less attractive to financial instruments like bonds or stocks that pay interest or dividends. Does the DEIR consider this RISK to the success of a proposed gold mine, when the cost of failure or closing, are likely to result in significant adverse environmental and clean up costs to Nevada County and its taxpayers?

6

Ind 268-15



Chart 1: Historic Price of Gold Chart. 1992-to-2022

Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.

Ind 268-16

CONCLUSIONS: Again, having reviewed many DEIRs for a number of organizations over many years, my professional opinion is that this DEIR is INADEQUATE and INCOMPLETE!

Ind 268-17

It underestimates or ignores CUMULATIVE SIGNIFICANT ADVERSE IMPACTS & RISKS in a number of areas, including WATER, AIR, TRAFFIC, and QUALITY of LIFE CONCERNS!

Ind 268-18

The DEIR makes ASSUMPTIONS that without complete information or study. It makes ASSUMPTIONS that NECESSARY, but RISKY MITIGATIONS, some that last forever, will be successful, when FAILURES involving WATER AVAILABLITY and QUALITY, AIR QUALITY, GREENHOUSE GAS EMISSIONS, PROPERTY VALUES, TAX REVENUES, ENERGY USAGE, & EVEN ASTETHICS…

Ind 268-19

The DEIR indicates that the PROPOSED PROJECT was POORLY CONCIEVED and HIGHLY SPECULATIVE, and SHOULD NOT BE APPROVED!

Thank you for the opportunity to comment on this important document.

Gary Zimmerman
Economist
11453 Snowline Road
Nevada City, California 94595

INDIVIDUAL LETTER 268: GARY ZIMMERMAN

Response to Comment Ind 268-1

This comment is introductory in nature and the commenter opposes the project. The commenter also states the DEIR is inadequate and identifies the Centennial Industrial Site as a "Toxic Superfund Waste Site." The commenter's opposition to the project is noted for the decisionmakers. Regarding the Centennial Industrial Site, the commenter is referred to Master Response 9 – Historical Mine Waste at Centennial Site. Responses to specific comments are provided below.

The commenter incorrectly asserts that the Centennial Site is a "Superfund" site. The Centennial Site has never been on the National Priorities List[1] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[2].

Response to Comment Ind 268-2

The commenter objects to the project's energy consumption and states that the project will result in adverse air quality impacts (e.g., GHG emissions). The commenter does not identify how the DEIR is inadequate with regard to these impacts. The DEIR analyzed air quality impacts in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found those impacts to be less than significant after mitigation. The commenter is also referred to Master Response 27 – Greenhouse Gas Thresholds and Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Ind 268-3

The commenter raises concerns regarding businesses that sell electronic equipment and any potential impacts related to underground blasting and vibrations. The vibration impacts to electronic equipment was analyzed for analog devices and underground blasting associated with the project would result in a less than significant vibration-related impact to analog devices. (DEIR, pp. 4.10-54, 4.10-55.) Regarding purely economic losses as a result of the project, the commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-4

The commenter asks if a proposed estimate of business losses to electronics businesses near the project site. The commenter is referred to Response to Comment Ind 268-3.

Response to Comment Ind 268-5

The commenter asks if the Project Applicant has developed a cleanup plan for the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 268-6

The commenter asks if the Project Applicant will pay for the cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

[1] https://www.epa.gov/superfund/superfund-national-priorities-list-npl
[2] https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi

Response to Comment Ind 268-7

The commenter raises concerns with the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

Response to Comment Ind 26-8

The commenter asks whether asbestos is found within the Idaho-Maryland Mine tailings and whether new waste rock from the Idaho-Maryland Mine would contain asbestos. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

The DEIR discusses asbestos in detail in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found the impacts to be less than significant after mitigation. The commenter is also referred to Master Response 22 – Conservatism of Asbestos Assumptions.

Response to Comment Ind 268-9

The commenter is concerned about the economic benefits of the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-10

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-11

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-12

The commenter is concerned about the project's potentially adverse economic impacts. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-13

The commenter is concerned that the price of gold may fluctuate and impact the viability of the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-14

The commenter is concerned that the price of gold may fluctuate and impact the viability of the project. The commenter is also concerned about reclamation when the Idaho-Maryland Mine closes. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Regarding reclamation, the project requires an approved Reclamation plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably

determines are adequate to perform reclamation in accordance with the mining operation's approved Plan. (DEIR, p. 4.6-24, Appendix C.)

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 268-15

The commenter provides an image of chart showing the historic price of gold from 1992 to 2022. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-16

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. The commenter is also referred to Master Response 1 – Non-EIR/Administrative Issues

Response to Comment Ind 268-17

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. In regards to quality of life concerns, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 268-18

The commenter states that the DEIR is inadequate but provides no specifics or evidence. Responses to specific comments are provided above. In regards to economic issues, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 268-19

The commenter states that the project is poorly conceived, speculative, and should not be approved. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 269

1

DRAFT EIR EMAIL COMMENTS –

Proposed Idaho-Maryland Mine (DEIR).

April 4, 2022

RECEIVED
APR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

CC: ORIGINAL
BY EMAIL
ON 4-4-2022
(See Back Page)

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: daho.MMEIR@co.nevada.ca.us

GENERAL COMMENTS on the DEIR and the Proposal from Gary Zimmerman of Nevada City, CA:

Ind 269-1

Thank you for the opportunity to **comment on the DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) for the proposed re-opening of the now closed Idaho-Maryland Mine and Toxic Superfund Waste Site**.

From my experience reviewing and commenting on a number of environmental impact reports, as well as the economic impacts of a number of proposed projects over the past four decades. I would like to provide comments on the DEIR and the associated proposed project.

- ✓ **I would like to begin with comments on several general aspects of this DEIR, which is clearly incomplete and inadequate, and likely will end up in court.**

GENERAL OBSERVATIONS:

- ✓ **CLIMATE CONCERNS: This one proposed project would consumer about 1/8th of the county's current energy consumption and generate ADDITIONAL GREENHOUSE GAS EMISSIONS that would offset existing County Efforts to REDUCE EMISSIONS. Straining Nevada County's power grid and spiking greenhouse gas emissions and worsening air quality ARE SIGNIFICANT ADVERSE IMPACTS!**

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- ✓ **If not, why not? If so, when will it be available to Grass Valley and Nevada County businesses, governments, and the public?**

- ✓ **CENTENNIAL SITE: This site is ALREADY A TOXIC "SUPERFUND" SITE, WAS IT SUPPOSED TO BE CLEANED UP FIRST by Rise Gold?**
Has Rise Gold developed a clean up plan? Implemented a clean up plan? Paid to begin the clean up? If not, why not?

- ✓ **WILL THE PROPOSED MINE PAY FOR THE EXISTING CLEAN UP, OR WILL IT "FAIL" AND LEAVE OTHERS (GOVERNMENTS AND TAX PAYERS) TO PAY FOR THE CLEAN UP?**
  How can Nevada County protect itself from the RISK that FAILURE or EARLY CLOSURE results in "Others" paying for the proposed Rise Gold clean up(s)?

- ✓ **NOTE: RISE GOLD bought this property knowing that it included nearly 270,000 cubic yards of mine tailings that include a variety of toxics that should be cleaned up…**
  Has the applicant made a good faith effort to begin the toxic superfund site clean up on the Centennial parcel? What is the cost of the clean up of existing toxics on the site? The annual cost of clean up associated with proposed annual operations?

- ✓ **ASBESTOS: SERPENTINE ROCK, common in Nevada County and closed mines, often contain asbestos. Is the type(s) of asbestos found in the Idaho-Maryland mine tailings considered a toxic waste today? What is the typical asbestos content of the mine tailings that would be produced by the proposed reopening of the mine? What are the annual costs of cleaning up the existing mine tailings, and their asbestos content, and the costs of cleaning up additional "new" mine tailings that would be located on the proposed mine site?**

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4

- ✓ **ECONOMIC IMPACTS: WHAT ARE THE ECONOMIC COSTS, in lost property values arising lost or contaminated wells, from close proximity to an active mine site, toxic waste tailings, noise, traffic, air and water quality?**

- ✓ **FALLING PRPERTY VALUES, both private homes and local businesses operating near or in the vicinity of the toxic sites, and properties losing property rights to their groundwater, also likely will impact Nevada County property tax assessments and property tax receipts. ,Overtime, or in event that the proposed mine fails or is closed before the 80-year timeframe is completed, these costs will be CUMULATIVE and could be SUBSTANTIAL!**

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Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.

5

✓ **MARKET RISK: PRICE of GOLD? Aside from the many other RISKS associated with the proposed mine reopening, is the price of gold. The potential success or failure of this proposed project, from the standpoint of the firm, may depend on the price of gold on the global market. Please note that gold prices have a history of moving, both up & down, with a longer-term upwards trend. The downward movements, like during the 2008 Financial Crisis, create another RISK, that a fall in the price of gold also could cause a failure of the proposed mine operations. For example, note the substantial fall in gold prices from the 2012 peak through 2016. Sales of gold stocks by central banks in a financial emergency or crisis also could dramatically lower the market price of gold for other uses.**

✓ **FAILURE or CLOSING (well before 80 years…)**
The price of gold is high now, but that does not guarantee that it will remain high forever. How might higher and rising interest rates, anticipated in the years ahead, also make non-interest paying (but including costs of gold storage) gold less attractive to financial instruments like bonds or stocks that pay interest or dividends. Does the DEIR consider this RISK to the success of a proposed gold mine, when the cost of failure or closing, are likely to result in significant adverse environmental and clean up costs to Nevada County and its taxpayers?

6

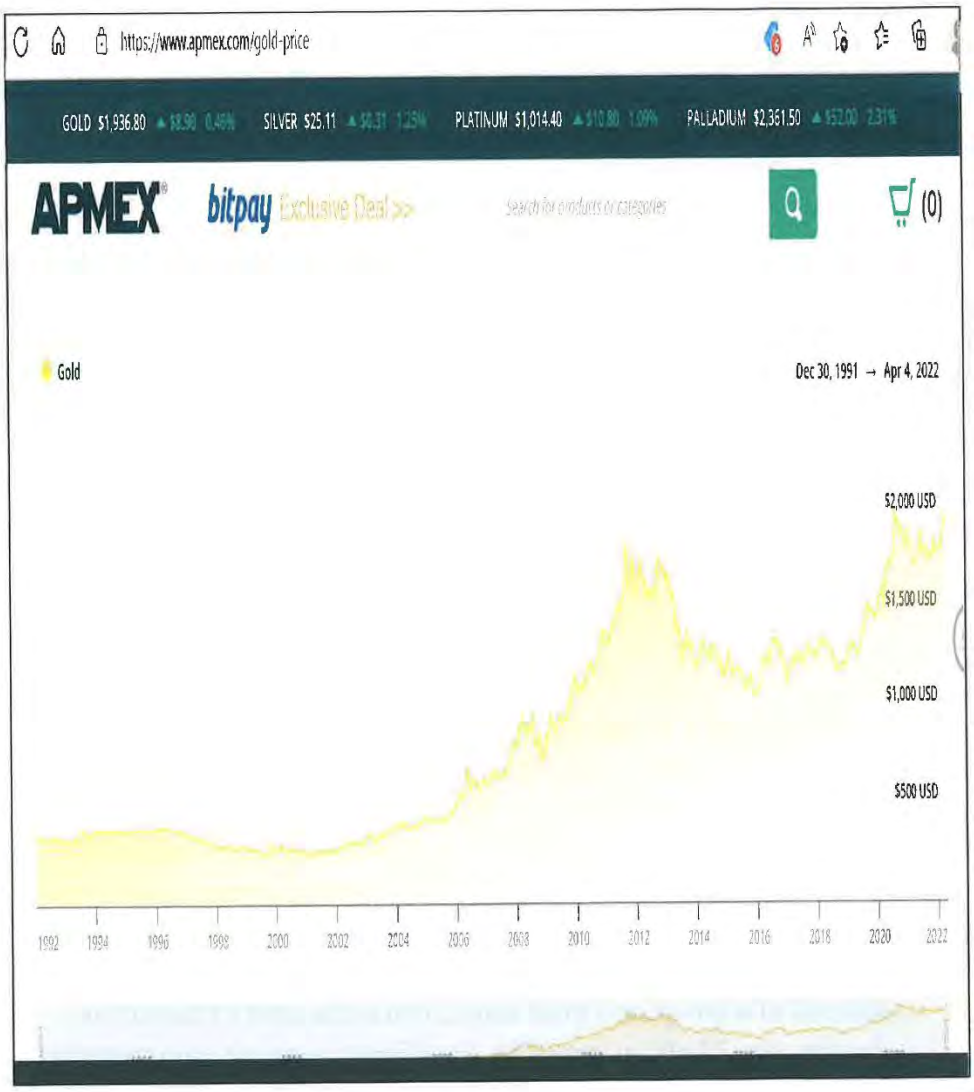

Chart 1: Historic Price of Gold Chart. 1992-to-2022

7

CONCLUSIONS: Again, having reviewed many DEIRs for a number of organizations over many years, my professional opinion is that this DEIR is INADEQUATE and INCOMPLETE!

It underestimates or ignores CUMULATIVE SIGNIFICANT ADVERSE IMPACTS & RISKS in a number of areas, including WATER, AIR, TRAFFIC, and QUALITY of LIFE CONCERNS!

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The DEIR indicates that the PROPOSED PROJECT was POORLY CONCIEVED and HIGHLY SPECULATIVE, and SHOULD NOT BE APPROVED!

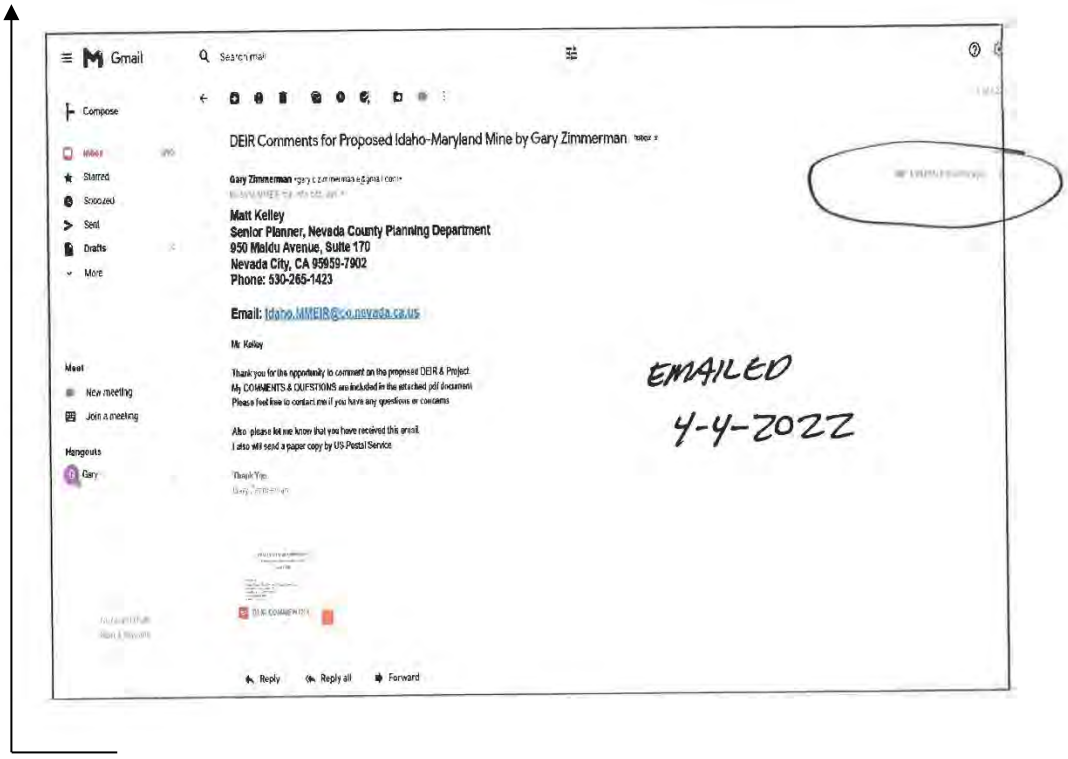
Thank you for the opportunity to comment on this important document.



Gary Zimmerman
Economist
11453 Snowline Road
Nevada City, California 94595

Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.

8



Comments on the DEIR for the Proposed Reopening of the Idaho-Maryland Mine in Nevada County.

INDIVIDUAL LETTER 269: GARY ZIMMERMAN

Response to Comment Ind 269-1

This letter is a duplicate of Individual Letter 268. Please see responses to comments for Individual Letter 268.

Individual Letter 270

RECEIVED
FEB 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

February, 2022

Nevada County
Board of Supervisors

Dear members,

Please,
Water more
Precious
than Gold.

Ind 270-1 No Mine!!!

Sincerely
Gwen Moore
320 Hubbard Rd.
Grass Valley,
Calif. 95945

INDIVIDUAL LETTER 270: GAVEN MOORE

Response to Comment Ind 270-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 271

Nevada County Planning Commission 02-04-2022
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 271-1

There are many reasons this mine should NOT be reopened. My reason is simple. The risk (environmental calamities, reduced property values, noise and traffic issues) is not worth the reward (a few new jobs and more gold to be stored in vaults around the world).

I am a resident of Nevada County and believe that Rise Gold corporation lacks either respect or understanding of the impact their mine project will have on the environment and people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Sincerely,

Geoff Pollard
800 Freeman Lane Apt 301
Grass Valley, VA 95949
925-323-4349
gppollard@gmail.com

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

RECEIVED
FEB 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 271: GEOFF POLLARD

Response to Comment Ind 271-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 272

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Idaho.MMEIR@co.nevada.ca.us
With copy to: DEIRcomments@cea-nc.org

April 4, 2022

RE: Idaho Maryland Mine DEIR Comments

Dear Mr. Kelley

Ind 272-1 This letter is to provide comments on the Draft Environmental Impact Report prepared for the Idaho Maryland Mine project. I live at 14401 Pierite Road in Nevada City, and have been a resident of Nevada County for approximately eight years. I am also a former city planner (City of San Francisco) with nearly 20 years of experience with CEQA and planning review of California projects.

My comments are limited to two areas of the DEIR – Project Background and Hydrology. Both sections have significant flaws that, at a minimum require additional analysis and recirculation of the DEIR.

Chapter 3.4 Project Background – Piecemealing

Ind 272-2 Section 3.4 of the DEIR briefly discusses the directly related project of the Voluntary Cleanup Agreement and potential Remedial Action Plan under consideration for the Centennial Industrial Site. The section says, in pertinent part, "Under the plan, the project applicant would **excavate soils within the former eastern and western tailing ponds and consolidate contaminated materials on-site, as well as stabilize contaminated materials within a small hot spot area by cement treatment prior to on-site consolidation**. Without explanation as to why this significant earthwork, excavation and construction project would be excluded from the DEIR, the report concludes that this unapproved, uncompleted, hypothetical project would be presumed to represent the baseline condition for the Idaho Maryland Mine analysis. This is nonsensical and clearly piecemealing. Cumulative construction and operational impacts, including those related to air quality, water quality, truck trips, etc. have not been analyzed, must be added to the current analysis and the DEIR must be recirculated.

Chapter 4.8 Hydrology and Water Quality

Ind 272-3 Section 4.8 and specifically Mitigation Measure 4.8-2(a) proposes a well and groundwater monitoring scheme that effectively proves (because of the monitoring scheme proposed) that the ultimate impacts of the dewatering of mines that have been for decades underwater is unknown. Indeed, the impact of mine dewatering in this region has no remotely recent precedent. In the current mega-drought, it is very reasonable to assume that the removal of millions of gallons of groundwater from the mines will have the very predictable impact of

drawing nearby subsurface flows to the mines, potentially affecting not just 30 nearby wells but potentially hundreds or thousands of nearby well.

Ind 272-4

The mitigation measure goes on to state that any well that is reduced via dewatering by more than 10% (which could be as much as a 20' reduction in a 200' deep well) will be remediated or potable water produced by some other means, all at the project sponsor's cost. The fatal flaw with this logic is that there is a very reasonable likelihood that the number of wells impacted in this way could number in the multiple hundreds and therefore 1) cannot reasonably be replaced by NID water, 2) would represent in and of itself a significant increase in NID service area requiring its own CEQA review, and 3) could conceivably involve enough wells so as to be technically infeasible or financially impossible for the project sponsor to address. This would result in a reasonably foreseeable scenario where the project sponsor drags the community through a science experiment only to find out that it cannot afford the mitigations reasonably required by MM 4.8-2(a).

This impact must be correctly classified as Significant and Unavoidable unless and until the project sponsor agrees to a bond or similar irrevocable financial commitment equal to the cost of mitigating the impacts described above, and certainly well beyond just placing 30 of the most directly impacted neighbors on NID water.

Ind 272-5

Thank you for your care and consideration in the review and analysis of this project. As you probably can see from all the public concern it has engendered, a lot of us are very worried that this project is the wrong project for Nevada County at this time. While the promised economic benefits are not guaranteed whatsoever, we the residents of Nevada County will be left with the reality of another failed mining experiment and all the environmental impacts it will bring.

Geoffrey Nelson

14401 Pierite Road
Nevada City, CA 95959
(415) 515-7105
nelson.geoffrey@gmail.com

INDIVIDUAL LETTER 272: GEOFFREY NELSON

Response to Comment Ind 272-1
This comment is introductory in nature and the commenter is concerned with two areas of the DEIR, Project Background and Hydrology. The comment is noted and responses to specific comments are provided below.

Response to Comment Ind 272-2
Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 272-3
The DEIR discusses the impact to private wells in Chapter 4.8 and found that the impacts would be less than significant after mitigation. (DEIR, 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 272-4
The commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 272-5
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 273

From: gerald thomas <tallpeople4@sbcglobal.net>
Sent: Sunday, April 3, 2022 8:32 PM
To: Idaho MMEIR
Subject: Idaho Maryland mine

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Matt Kelley,

Ind 273-1 I am a 10 year resident of Nevada County residing in Nevada City. I have atrial fibrillation and have concerns about the air quality that this huge operation would have on our already poor air quality. For me carbon offsets which are mentioned in the report are simply not preventing pollution but merely buying permission to pollute. There is no way that this proposed hardrock mine will not degrade the air quality we currently have. Also once this mine if approved and begins operation, I do not believe that the levels of monitoring and enforcement necessary will take place. Because of the money involved which will mostly end up in the pockets of Canadian investors there will surely be lawsuits resulting form attempted enforcement of any mitigation required. The amount of money from this operation that Grass Valley or Nevada County will ever see will be a minuscule portion. As others have mentioned this company left the Canadian government with a mess to cleanup from a failed operation by the same CEO running Rise Gold. We need to do everything possible to combat the massive threat of climate change and allowing this gold mine to reopen would be one of the worst possible uses of this land with respect to climate change and air quality. I therefore strongly reject Rise Gold's bid to reopen this mine.

Sincerely
Gerald Thomas
316 Monroe Street
Nevada City, CA 95959

INDIVIDUAL LETTER 273: GERALD THOMAS

Response to Comment Ind 273-1

The comment expresses general concerns regarding air quality and climate change. Please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. CEQA Guidelines Section 15126.4 (c)(3) specifically mentions "Offsite measures, including offsets that are not otherwise required, to mitigate a project's emissions" as one option for GHG mitigation. As such, the carbon offset mitigation within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Plan for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. The commenter expresses general concerns regarding impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility.

Individual Letter 274

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

To Matt Kelley, Senior Planner for the Nevada Planning Commission

mattkelley@ co.nevada. ca.us

To: Members of the Nevada County Planning Commission, the Board of Supervisors, and the Nevada County Planning Commission Staff, Matt Kelley, Senior Planner

I am writing to give my support to Wolf Creek Community Alliance's (WCCA) and Community Environmental Activists Foundation's (CEA Foundation) recent comments to you regarding the DEIR for reopening Idaho Maryland Mine.

WCCA's comments on the Biological Resources section 4.4 are detailed and extensive, 36 pages long, and extremely well done. As a biologist with a masters in renewable resources and one of the founding members of this organization I heartily endorse this. So rather than add more I am asking that you carefully read them and take all that is said into account when making you decision.

I am also writing to you to read carefully the CEA Foundation's comments, again extensive and based on research and commitment to our community and its environment. Their goal is, "**CEA Foundation advocates for responsible land use and environmental protection policies and actions in Nevada County. Our goal for Nevada County's future is a thriving community, a strong economy, and a healthy environment.**"

Ind 274-1

I have attended the ZOOMs that have been presented by Mine Watch sponsored by CEA Foundation.

I support all that they have presented to you about the DEIR and recommend that you not only carefully read their comments but go to: https://www.cea-nc.org/category/the-idaho-maryland-mine/ for more information.

So rather than add more to the already extensive materials that you have received from these two groups, I am asking to be added on as a supporter of their comments.

Thank you for your time and energy in this extremely long and intense process. Please know and understand the negative impacts to our environment, our health, and economy if the Rise Gold application is approved.

Thank You,

Geri Stout

Geri Stout

101 Bawden Ave

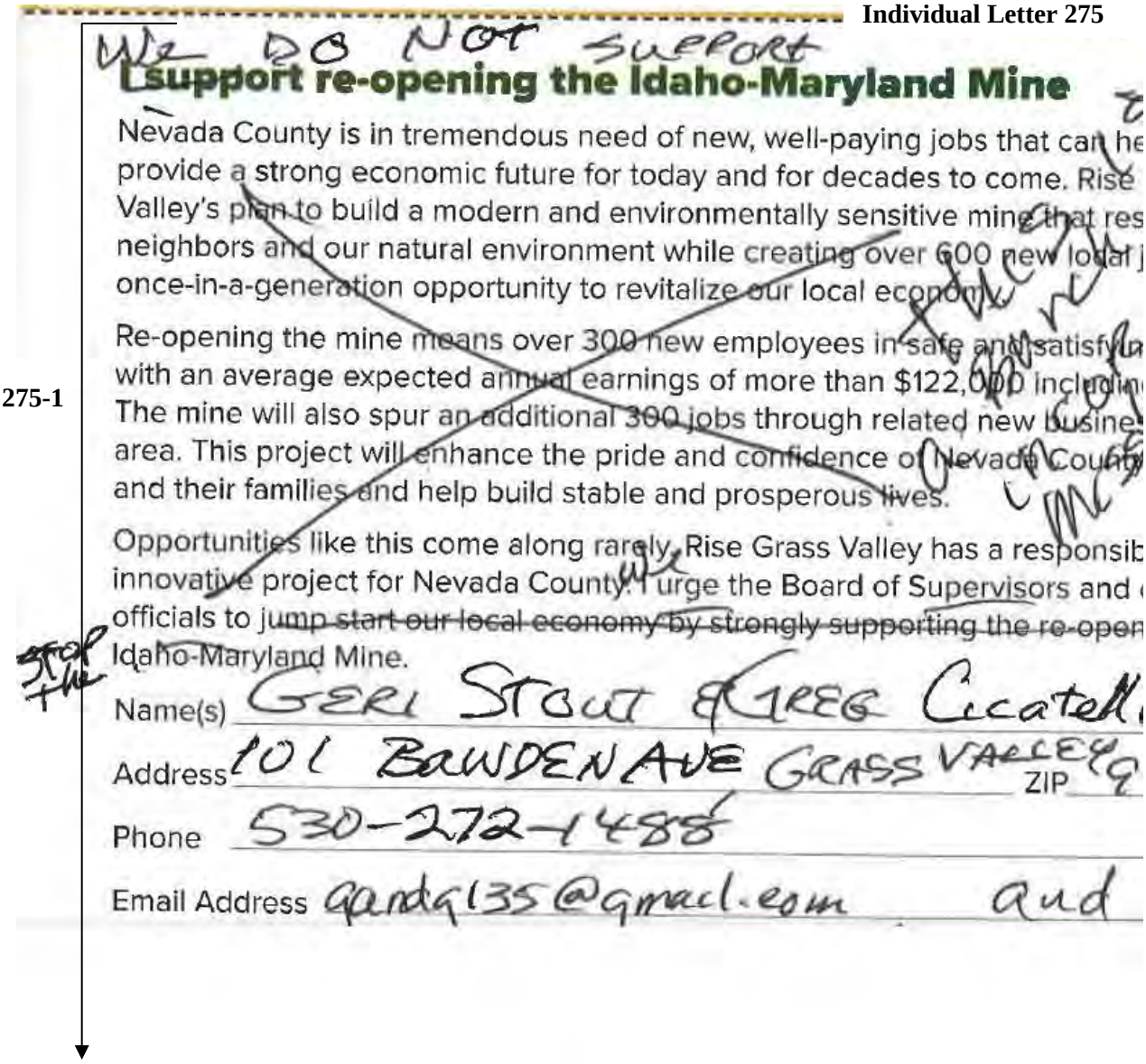
Grass Valley, CA 95945

INDIVIDUAL LETTER 274: GERI STOUT

Response to Comment Ind 274-1

The comment does not specifically address the adequacy of the DEIR, but points to other comment letters received. Please see Reponses to Comment Letters Grp 6 to 8 and Grp 29 to 32. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 275



We DO NOT support

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can he
provide a strong economic future for today and for decades to come. Rise
Valley's plan to build a modern and environmentally sensitive mine that res
neighbors and our natural environment while creating over 600 new local j
once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfyin
with an average expected annual earnings of more than $122,000 includin
The mine will also spur an additional 300 jobs through related new busine
area. This project will enhance the pride and confidence of Nevada County
and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsib
innovative project for Nevada County. I urge the Board of Supervisors and
officials to ~~jump start our local economy by strongly supporting the re-open~~
Idaho-Maryland Mine.

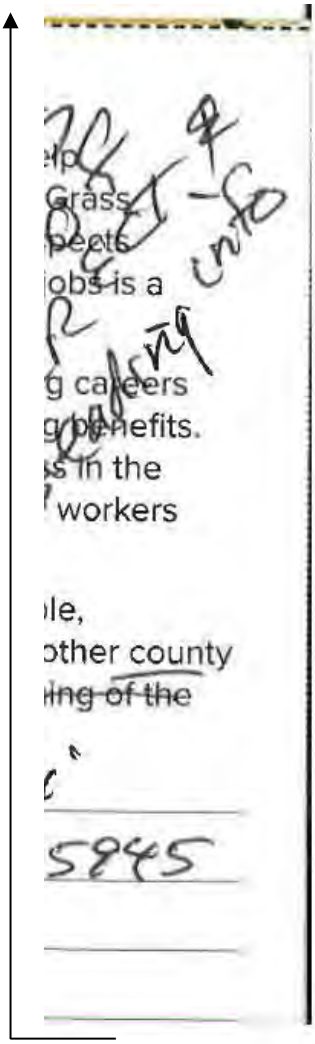
Name(s) GERI STOUT & GREG Cicatell

Address 101 BOWDEN AVE GRASS VALLEY ZIP 9

Phone 530-272-1488

Email Address gandg135@gmail.com and

Ind 275-1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5845

INDIVIDUAL LETTER 275: GERI STOUT AND GREG CICATELLI

Response to Comment Ind 275-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 276

From: Gent Snell
To: BOS Public Comment
Subject: RISE MINE
Date: Thursday, March 3, 2022 8:31:30 AM

Dist 2

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Ind 276-1

No Mine! Too much is at stake, please don't pursue this project for our beautiful community

Sent from my iPhone

INDIVIDUAL LETTER 276: GERRI SNELL

Response to Comment Ind 276-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 277

March 15, 2022

Nevada County Planning Dept.
950 Maidu Ave.
Suite 170
Nevada City, CA 95959

Re: Proposed mine project at the Idaho-Maryland Mine owned by Rise Grass Valley

Dear People,

I began reading the draft EIR. After an hour or so of plodding through the report I realized the reading and comprehension of the report is not for the layman, of whom I consider myself one. Although I gave up my attempt to absorb as much as I could, I do have strong opinions on subject of the mine. My opinions have been formed through reading articles, 'op-eds' and letters in The Union newspaper; by witnessing the environmental devastation caused by previous mining activity in the county; by my understanding of the track record of the principal owners of Rise Grass Valley; by conversations with my neighbors and by common sense.

Ind 277-1

I fear that allowing the mine to go forward would be devastating to:

1. the air and water quality in the county.
2. the people living in proximity of the mine by having their wells impacted by the lowering of the water table, by having the noise and vibration affect their quality of life and by lowering the value of their properties.
3. traffic conditions that will become far worse due to the volume of trucking created by the mining operations

Ind 277-2

(It is my understanding that mitigating some of these problems was left ambiguous in the draft EIR).

Ind 277-3

I do not believe the mine will produce hundreds of jobs paying approximately $90,000 a year for local workers as advertised in Rise's mailer. I can only imagine a great many out of town workers would need to be be imported into the county, which already has an acute housing shortage.

The question in my mind is not this whether project should go forward or not, but rather why is any serious consideration being given to it at all.

Sincerely,

Glen Garrod

Glen Garrod
PO Box 356
Nevada City

RECEIVED
MAR 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Phone: 530-478-9710

INDIVIDUAL LETTER 277: GLEN GARROD

Response to Comment Ind 277-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 277-2

The comment expresses a general opinion that mitigation was left ambiguous in the DEIR, but does not provide specific examples that would allow for a detailed response.

Response to Comment Ind 277-3

Please see Chapter 4.9, Land Use and Population and Housing, of the DEIR regarding impacts related to housing future mine workers. Please see Master Response 2 – Social and Economic Impacts. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 278

From: Glenna Rogers <gjr6121@att.net>
Sent: Monday, April 4, 2022 1:02 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Stop the Mine

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To Whom It may Concern.
I live on Dogwood Road (off of Greenhorn) in Grass Valley - approximately 1.75 miles from the mine. To get to my house I will have to pass the mine.

I do not this mine in my neighborhood. It will create:
A. Endless noise and mine waste
B. Most likely deplete our wells
C. Create toxic waste
D. Devalue our property. Who will want to buy our houses when we want to sell

Ind 278-1

Why are you so interested is destroying this community?
An active mine does not belong in Grass Valley - PERIOD.

Would you like to live within miles of an active mine? I think not.

Thank you
Glenna Rogers
12100 Dogwood Road
Grass Valley, CA 95945
(510) 363-6120

1

INDIVIDUAL LETTER 278: GLENNA ROGERS

Response to Comment Ind 278-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 279

RISE GRASS VALLEY 2/15/22

Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-5 P9 104 ECRWSH R010
Gordon Scott Mann
12661 Torrey Pines Dr
Auburn, CA 95602-8028

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FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

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Dist 2

Dear Nevada County Board of Supervisors,
How much of this is proven, and if wells are not impacted, why run the NID water line? Perhaps opening the mine is not a bad idea. Allowing RISE to open the mine is a bad idea.

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

I do not trust Rise to send them any reply & have them count it!

Ind 279-1



Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

INDIVIDUAL LETTER 279: GORDON MANN

Response to Comment Ind 279-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Comments on the Idaho-Maryland Mine Project Draft EIR

Via email to matt.kelley@co.nevada.ca.us Matt Kelley, Senior Planner Nevada County Planning Department 950 Maidu Avenue, Suite 170 Nevada City, CA 95959

To: Matt Kelley, Senior Planner, Nevada County Planning Department

Dear Mr. Kelley,

Thank you for the opportunity to review the Idaho-Maryland Mine Project Draft EIR. My compliments to you and the consultants that prepared and contributed to the document; it is generally a thorough and considered analysis of a complicated and large project. Yet, there are elements of the Draft EIR that are inadequate as written.

Ind 280-1

I offer comments primarily in subjects with which I have had direct experience during my career, CEQA process and analysis, and biological resources protection and mitigation. More specifically, my comments are on three topics: 1. Proposed biological resources mitigation measures, 2. Impacts to fish habitat, and 3. The alternatives analysis in the DEIR.

1. **Feasibility shortfalls in proposed biological resources mitigation measures.**
    a. Vague site protection requirements, raising questions of mitigation measure feasibility. There are multiple impacts to biological resources that are significant without mitigation, but which are found to be less-than-significant after proposed mitigation. These include significant impacts to the following biological resources:
        i. Special-status plant species, including the pine hill flannelbush and other species (4.4-1).
        ii. Candidate, sensitive, or special-status wildlife species, including the foothill yellow legged frog, California red-legged frog, California black rail, coast horned lizard, special-status bats, and raptors and migratory birds (4.4-2).
        iii. Riparian, wetlands, and other sensitive natural communities (4.4-3).
        iv. Cumulative loss of habitat for special-status species (4.4-6).

Ind 280-2

Most of the mitigation measures needed to reduce biological resources impacts below the level of significant rely on protecting the habitat where the species occur or may occur. For example, Mitigation Measure 4.4-1 (a) reads as follows:

> *Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shallrequire that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any off-site areas not owned by the applicant where the transplants are to be located.* Page 4.4-66.

The feasibility of this measure cannot be determined as written. The measure initially calls for a conservation easement, but subsequently includes language that raises doubt: "or use a similar land protection mechanism..." What is this other mechanism? In the past, deed restrictions were sometimes used, but they have been found to be

inadequate in recent times due to lack of oversight and enforcement. Deed restrictions are no longer allowed for wetland mitigation in California due to their poor performance. If a conservation easement is to be used, there is no easement holder identified - this also could be a feasibility issue, since there needs to be an entity that is willing to hold the easement. Finally, it isn't enough to just put and easement on. There needs to be a funding mechanism for long-term monitoring and management. No funding of long-term monitoring and management is presented in the Draft EIR.

Conclusion #1a: With the uncertainties outlined above, the feasibility of the site protection measures is in doubt and the biological resources impacts 4.4-1 and 4.4-2 should be considered unmitigated in the Draft EIR. Note: in support of this conclusion, it would be logical for the reasoning in the Draft EIR's traffic impact section to also apply equally to biological mitigation measures. Impacts to the SR 174/ Brunswick intersection were found to be significant and unavoidable because "*Because the remaining funds for the intersection improvements are unknown, in terms of timing and contributing parties, the successful implementation of the intersection improvements is uncertain.*" Page 4.12-66. As explained above, the successful implementation of biological resources mitigation measures is also uncertain.

b. Undefined mitigation measures for wetlands and waters of the U.S. and the State. The mitigation for jurisdictional wetlands and waters (Mitigation Measure 4.4-3 (c) reads, in part:

Ind 280-3

> *To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.* Page 4.4-90.

This statement raises fundamental question regarding the status of the project design and the likelihood that impacts can be minimized. Has the project been designed to avoid and minimize adverse effects? The Draft EIR should be able to answer this question, but does not.

A second part of the mitigation measure introduces even more questions. It reads:

Ind 280-4

> *Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.* Page 4.4-90.

This is too vague to assure feasibility. Are applicable mitigation credits readily available? If not, where could onsite and/or offsite wetland creation or restoration feasibly occur given physical constraints, land availability, and technical considerations? Onsite or offsite wetland creation/restoration requires a physically suitable real estate footprint, which is often difficult, especially in the foothills where topography can be a limiting factor. Permittee responsible mitigation has been shown again and again to have poor implementation and success. One of many studies documenting this is the National

Academy of Sciences, National Research Council's (NRC) "Compensating for Wetland Losses Under the Clean Water Act." https://nap.nationalacademies.org/catalog/10134/compensating-for-wetland-losses-under-the-clean-water-act

In the NRC study, and others, a major cause for the failure of mitigation measures is the lack of oversight. This is the context of short duration permits, especially compared to the proposed 80-year mining permit. This 80-year period will transcend the careers of the permittees, the County staff overseeing the permit, and the state and federal professionals that share oversight responsibilities. This will compound the difficulties seen in the context of much shorter duration permits.

Conclusion #1b: With the unanswered questions outlined above, the feasibility of the wetland mitigation measures is not demonstrated and the biological resources impact 4.4-3 should be considered unmitigated in the Draft EIR.

Ind 280-5

2. **Lack of analysis of impacts to fish habitat**. The Draft EIR contains an analysis of the potential for the project to interfere with the movement of fish. However, there appears to be no analysis of the potential effects on fish habitat from the alteration of Wolf Creek hydrology. The proposed discharges of water from the mine site will change the timing and duration of flows in Wolf Creek and these changes could have an impact on fish habitat. Changes in water quality and temperature may also affect fish. Perhaps the Draft EIR is relying on the effectiveness of discharge permits to offset impacts, but the document should include a disclosure of these impacts.

   Conclusion #2: The lack of analysis of impacts from hydrology alterations to fish populations in the Draft EIR leaves a fundamental environmental effect unaddressed, one that is reasonably foreseeable based on comparable experiences in other locations.

Ind 280-6

3. **Insufficient range of alternatives**. Section 6.3 contains a helpful discussion of the purposes of the alternatives analysis and the need to evaluate a range of reasonable alternatives. The alternatives included in the EIR need to meet *most* of the *basic* objectives of the project and be effective in addressing significant effects. The decision on whether or not to include alternatives should be taken in the overall context of the most fundamental purpose of an EIR – that of a disclosure document. In this context, the Draft EIR does not contain a full range of reasonable alternatives. Specifically, the Draft EIR does not contain an alternative that lessens the magnitude of proposed extraction. There is an alternative – number 4 – that discusses a reduced rate of extraction; but this alternative still envisions full extraction of resources and this assumption increases the operational life of the mine from the proposed 80 years to 130-160 years. The Draft EIR then goes on to note the various impacts that would be exacerbated by the longer operating period, such as risks from the ongoing transportation, underground storage, and use of explosives. The same extended operation assumptions drive the Draft EIR conclusion that effects of dewatering on groundwater would be worsened.

   The Draft EIR needed to include an alternative addressing the scale of the project, not just the rate of extraction. So, for instance, a mine that would extract 500 tons per day (compared to the

proposed project rate of 1,000 tons per day), yet still only operate for 80 years could reduce the significance of the aesthetics impacts. Also, per my comments under item number 1 above, how much would the potential for mitigation measure oversight shortfalls would be reduced compared to Alternative 4. What would a reduced footprint, or a reduced pad height, alternative mean for the various impacts forecast? We don't know the answers to these questions because the Draft EIR does not contain a basic alternative to the scale of the proposed project. The Draft EIR states that reduced extraction would not meet the project alternatives, but does not disclose the financial details that would allow the public to review and verify this assertion.

Conclusion #3: The Draft EIR does not have a reduced scale alternative, an omission that deprives the public from understanding how a smaller sized project would influence the various impacts disclosed throughout the document. Alternative 4 is a reduced rate of extraction project, but the ultimate scale of that alternative is the same as the proposed project. Consequently, the Draft EIR is deficient in not analyzing a reasonable range of alternatives.

In closing, thank you for your professionalism in providing this massive document and the opportunity to review it.

Respectfully,

Greg DeYoung, AICP

545 Jordan Street

Nevada City, California 95959

(530) 559-7770

INDIVIDUAL LETTER 280: GREG DEYOUNG

Response to Comment Ind 280-1

Comment noted. This is an introductory comment and does not provide a comment on an environmental issue associated with the project.

Response to Comment Ind 280-2

The commenter raises concerns regarding the feasibility of biological mitigation measures but does not provide specific detail about why those mitigation measures are infeasible. The mitigation measures require a variety of actions depending on the impact, ranging from additional state or federal agency permitting to preconstruction surveys, and each contains performance standards and timing making them consistent with CEQA.

The commenter specifically questions the feasibility of the conservation easement requirement in Mitigation Measure 4.4-1(a) for the Pine Hill flannelbush. It should be noted, the conservation easement is required prior to the issuance of grading permits; as a result, no impacts to Pine Hill flannelbush can occur until the conservation easement is in place. As noted by the commenter, the conservation easement (or similar mechanism) will require an easement holder, management and operations plan, and will be recorded with the County recorder. Please see Response to Comment Agcy 3-5.

Response to Comment Ind 280-3

Mitigation Measure 4.4-3(c) is stating that every attempt will be made to avoid impacts to waters of the U.S. and state during project implementation. The mitigation measure continues with additional language requiring agency permitting when those "waters" cannot be avoided. Reasonable estimates of impacts to waters of the U.S. and water of the state were assessed in the DEIR, and standard mitigation to avoid and minimize impacts in coordination with Corps was included. The precise avoidance and minimization actions will be specifically determined after consultation with the Corps, which is engineering level detail. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 280-4

The commenter questions the feasibility of compensatory mitigation. The comment does not include the full text of Mitigation Measure 4.4-3(c) which shows compensatory mitigation, if required, is part of the section 404 permit process for impacts to waters of the United State or jurisdictional waters of the State if they cannot be avoided. The regulatory agencies issuing these permits would include as conditions of those permits monitoring and performance criteria for wetland creation and/or restoration if chosen or required, as well as identification of contingencies that would be implemented in the event such mitigation failed. Note that this mitigation is required to be in place prior to ground disturbing activities, so no impacts would occur until mitigation acceptable to the regulatory agencies is in place. Additionally, compensatory mitigation could be implemented through the purchase of mitigation credits through the in-lieu fee mitigation program, which would not require any monitoring or performance criteria by the applicant, if such credits are purchased per permit requirements. An in-lieu fee compensatory mitigation program is up and running and available for permitted projects in Nevada County. The specific mechanism that is implemented to compensate for impacts to aquatic resources will ultimately be determined in consultation with the regulatory agencies. The list is provided not to imply that one or more of these methods might not be successful, but rather to be transparent about the full range of options available. It is inappropriate to finalize the mechanism of mitigation prior to permit discussions

with the agencies that have authority over the resources being mitigated. The CWA Section 404 permit from the USACE and the CWA Section 401 permit from the RWQCB will require full compensatory mitigation for all impacts to aquatic resources as conditions of the permits for the project.

Response to Comment Ind 280-5

Please see Master Response 34 – Resident Fish, Master Response 36 - Flows in South Wolf Creek, Master Response 32 – Temperature of Mine Water Discharge, and Master Response 35 – Discharge to South Wolf Creek, regarding the impacts to fish, discharge flow volumes, temperature, and quality, potential for erosion, and species impacts. CEQA guidelines require analysis of impacts to special-status fish, and as no special-status fish have potential to occur within South Fork Wolf Creek or Wolf Creek, no analysis of impacts to fish is appropriate.

Response to Comment Ind 280-6

DEIR Chapter 6 considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Further, the alternative proposed by the commenter, to reduce throughput to 500 tons per day, but maintain the project life at 80 years, is substantially similar to Alternative 4, which was already addressed in the DEIR. The commenter's proposed alternative would also cause a potential inconsistency with General Plan Policy 17.9 to "Encourage the mining of previously mined land, if such land still contains economically mineable minerals, so the land can be reclaimed for alternative uses." The proposed alternative would leave economically mineable minerals unextracted after the life of the permit and would therefore conflict with this policy. This Alternative would also have fewer employment and economic benefits as compared to the proposed project, which would not satisfy Objective 7. Similar to Alternative 4, this alternative may reduce some traffic impacts due to less traffic volume per day. However, as this alternative could cause a new land use impact due to inconsistency with the General Plan Policy 17.9, and would not meet Objective 7, this alternative is dismissed from further consideration.

Individual Letter 281

From: Greg Wolfe <wolfe1080@att.net>
Sent: Wednesday, March 30, 2022 8:19 AM
To: Idaho MMEIR
Subject: Mine proposal

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Ind 281-1

I am adamantly against the proposed mine project. You are all quite aware of the potential problems—water, pollution, noise, etc. Does our county have the resources to monitor all the various impacts? All those trucks constantly rumbling through town alone should be enough reason to deny any permits. Please do not allow the mine to reopen.
Greg Wolfe
439 Kate Hayes
Grass Valley

INDIVIDUAL LETTER 281: GREG WOLFE

Response to Comment Ind 281-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 282

From: Dr. Gregory Weisswasser ND
To: bdofsupervisors
Subject: I am against the opening of the mine
Date: Thursday, February 3, 2022 6:28:31 PM

Dist 3

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Ind 282-1

Dear Nevada County Board of Supervisors.
I am writing to inform you that I am against the opening of the Idaho-Maryland mine by rise gold. I own a business and property in Grass Valley in the vicinity of the mine project. I am opposed to the mine as it will have negative effects on the local environment, lifestyle , traffic, watershed, air quality and more. Please do not let this deal go through. If it does it will push me to consider if Grass Valley is the place to continue my business and home of over 18 years.
Sincerely,
Dr. Gregory Weisswasser ND
Owner of Whitewater Naturopathic

Sent from my iPad

INDIVIDUAL LETTER 282: GREGORY WEISSWASSER

Response to Comment Ind 282-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 283

From: gdelgado@earth-justice.org
To: bdofsupervisors
Subject: comment on Idaho Maryland Mine
Date: Friday, April 1, 2022 11:06:32 AM
Attachments: DEIR statement march 2022.docx

Dist 1

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Dear Supervisors,

A member of our organization, Earth Justice Ministries, read our statement at the recent public meeting about opposing the reopening of the Idaho Maryland Mind. The comments were limited to three minutes, so here is the statement in full.

Ind 283-1

Please take heed of the needs of this community and do not approve the reopening of the mine.

Sincerely,

Guarionex Delgado
11328 Red Dog Rd.
Nevada City, CA 95959
530 264 6094 cell
530 265 5976 home

INDIVIDUAL LETTER 283: GUARIONEX DELGADO

Response to Comment Ind 283-1

The comment does not address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project. Please see Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 284

March 25, 2022
950 Maidu Avenue, Suite 170
PO Box 599002
Nevada City, CA 95959-7902

To the Nevada County Planning Department,

Ind 284-1

I am a registered voter in Grass Valley and own my home on Hubbard Road. I will be impacted by the use of the precious water resources in the area and the pollution in the Glenbook Basin created by the additional truck/car traffic. I ask that the BOS and the Planning Commission reject the draft EIR for the following reason:

In section 4.3 the Draft EIR outlines the major sources of pollutants, which include, repeatedly, 'automobile and diesel trucks'. Further in section 4.3.2, there is the discussion of particulate matter including asbestos and crystalline silica.

Ind 284-2

The draft EIR indicates that the carbon offsets of the forests around will sequester 2,664 MT CO2e (page 4.3-17) over 80 years. This baseline is preproject. The project overview suggests that logging operations, mine preparation and soil/mine debris will disturb 104 acres of the 176 acre site. These acres will be deforested, the mine debris will cause more particulate pollution and the suggested trucking operations will only contribute to the county's existing struggle to reach a healthier air quality for Western Nevada county. It is notable that there will be up to 100 truck loads of material moved from the Brunswick site to the Centennial site daily. The pollutants and noise from these operation alone will significantly affect traffic noise and congestion along the roads used, changing the rural nature of the area in addition to adding pollutants.

Ind 284-3

It appears to me to be a project that uses valuable resources that are in short supply, particularly water, in our community, as well as contribute to the questionable air quality that exists in our valley community.

Ind 284-4

In an effort to encourage the BOS AND PLANNING COMMISSION to **REJECT the Idaho-Maryland Mine Draft EIR,** I respectfully submit my concerns. The quality of life in my neighborhood will be adversely affected and, I believe, these adverse effects will be felt throughout the county.

Gwen Moore

Gwen Moore
320 Hubbard Road
Grass Valley, CA 95945

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 284: GWEN MOORE

Response to Comment Ind 284-1

The commenter states that the project will impact water resources and pollute the Glenbrook Basin with additional traffic. The commenter also states that the project will result in negative air quality impacts, specifically asbestos and crystalline silica. The commenter does not state how the DEIR is inadequate with regard to the stated impacts. Air quality impacts, including asbestos and crystalline silica, are examined in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). Impacts to water resources are analyzed in Chapter 4.8 (Hydrology and Water Quality). The commenter is also referred to Master Response 21 – Conservatism of Silica Assumptions, Master Response 22 – Conservatism of Asbestos Assumptions, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 284-2

The commenter summarizes a portion of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) which estimates the carbon sequestration loss from deforestation of the 24 acres at both project sites. (DEIR, p. 4.3-17.) The commenter also states the project's trucking component will further degrade the County's air quality. However, the commenter does not identify any inadequacies of the DEIR. Carbon sequestration losses from the removal of forest areas by the project are included in the greenhouse gas emissions of the project. Air emissions from trucking is included in the analysis of air quality in Chapter 4.3.

Response to Comment Ind 284-3

The commenter states that the transport of engineered fill to the Centennial Industrial Site will result in pollutants, noise, and congestion. The commenter does not provide any additional information. Air pollution from trucking in analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR; noise from trucks is analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR; and traffic impacts from trucks are analyzed in Chapter 4.12 (Transportation) of the DEIR.

Response to Comment Ind 284-4

The commenter states that the County should reject the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 285

HANK MEALS
Historical Research & Interpretation
Writing & Photography
PO Box 111 Nevada City CA 95959
hmeals@nccn.net
530.478.9637/ 530.559.5508



Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

April 2, 2022

Civil engineers like to say, "What can't be measured can't be managed", while Alexander von Humboldt observed that, "What speaks to the soul, escapes our measurements."

Dear Nevada County Board of Supervisors,

To quote the introduction to the EIR, "The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations". Calm down a moment and try to visual what this will look like 1, 5, 20, 40 and 80 years out. What provisions are there to continually monitor "Necessary Impacts" that include a degradation of the environment on the physical and mental health level? What other permitee has been granted an 80-year window to do business (the profits of which will most assuredly leave this region).

Ind 285-1

I've lived in Nevada County for over 50 years, it's my home. People will frequently remark, "You must have seen a lot of change", which is true, but nothing compared to impacts associated with the Rise Gold proposal. As a former Tahoe National Forest archaeologist, I frequently worked with mining claimants and I never saw a mining operation that didn't produce more resource damage than that predicted by the "Plan of Operation." Almost any "necessary change" caused by "unforeseen conditions" was more calamitous than could have been predicted.

Mining creates an impact that gains its own momentum, self-importance and dare I say, arrogance. Rise Gold's proposal represents colonization by heavy industry. This proposal will create enormous and irreversible change in Grass Valley and Nevada City. Gold mining is gambling, despite the cascade of science in this EIR. I don't envy the task of our five County Supervisors (is that sufficient representation?) who must

1

interpret this ill-advised proposal and determine if industrial scale gold mining, admittedly part of our past, will dominate our future.

• • •

Here are a few specific issues that loom large for me:

Ind 285-2

• TOXIC SUBSTANCES: "Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species. (*Chapter 1 – Introduction Page 1-4*)."

Comment: After all the good work done by The Sierra Fund and the South Yuba Citizens League to call attention to toxic substances and remediation in the Bear and Yuba Rivers you can't really tolerate this. Too many people are now aware of the true costs of industrial level gold mining.

Ind 285-3

• BIOLOGICAL AESTHETICS, AGRICULTURAL and FORESTRY RESOURCES: "… for the purposes of the analysis of biological resources [& Aesthetics & Agricultural and Forestry Resources], the environmental baseline for the Centennial Industrial Site has been adjusted to reflect the *reasonably anticipated* conditions of the site following the remediation activities (*CEQA Guidelines Section 15125(a)). Chapter 1 – Introduction Page 1-6*)."

Comment: The proposed remediation appears to be more concrete to make nature behave?

Ind 285-4

• NOISE, a very big concern that will affect:
Quality of sleep, disturb wildlife and pets, mental health, residences and assisted living facilities located above the mining excavations, it will also negatively affect people subject to seizures, pregnant women, degrade the experience for Empire Mine State Park visitors and agitate students and teachers in nearby schools.

Ind 285-5

• INCREASED LIGHTING
"In addition, while lighting at the Brunswick Industrial Site has been designed to minimize light spill over onto adjacent properties, as discussed in the Aesthetics chapter of this EIR, new light structures are proposed throughout the Brunswick Industrial Site at strategic locations for pedestrian safety along internal walkways and around equipment areas, and to enhance the security of the property. Outdoor lights would be provided at project entry points, within the surface parking lot, and around the Brunswick Shaft and Process Plant and proximate buildings." (*Chapter 4.11 – Public Services and Utilities Page 4.11-27*).

2

Comment: Advances in lighting technology will surely advance in the next 80 years so this issue will need to be periodically reevaluated. I'm certain that lighting associated with the proposed project will be visible in Nevada City, a town based on tourism, requiring a particular lighting design

Ind 285-6

• SIGNIFICANT AND UNAVOIDABLE IMPACTS: "Significant and unavoidable cumulative impacts are impacts on the environment that result from *the incremental impacts* of a proposed project when added to other past, current, and future projects and cannot be alleviated to a less than cumulatively considerable level. Such impacts can result from individually minor but collectively significant actions that occur over time." (*Chapter 4.0 – Introduction to the Analysis Page 4.0-3*).
Comment: This is a significant issue that requires frequent monitoring for the duration of the proposed task, which RISE GOLD claims will take 80 years to complete.

Ind 285-7

"Nonetheless, cumulative buildout in the geographic area would result in a change in the visual character of the region, which would be considered a significant cumulative impact. As discussed under Impact 4.1-2 above, the proposed project would substantially degrade the character of the Centennial and Brunswick Industrial Sites, though they are zoned for industrial development and there are surrounding industrial land uses in the vicinity of the project sites. Therefore, the project's incremental contribution to the significant cumulative impact would be cumulatively considerable and significant and unavoidable." (*Chapter 4.1 – Aesthetics Page 4.1-30*)
"Based on the above, the proposed project's incremental contribution to this potentially significant cumulative impact would be ***less than cumulatively considerable.***"
"Mitigation Measure(s) None required." (Chapter 4.1 – Aesthetics Page 4.1-32).
Comment: I fail to see how this conclusion is reached?

Do your Best,

Hank Meals

3

INDIVIDUAL LETTER 285: HANK MEALS

Response to Comment Ind 285-1

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 285-2

As discussed further on pages 1-5 and 1-6 of the DEIR, separate CEQA review of a Remedial Action Plan (RAP) is being conducted with DTSC as the CEQA lead agency. DTSC released the CEQA document (Initial Study/Mitigated Negative Declaration [MND]) for the "Centennial M1 Property Clean-Up Project Remedial Action Plan" project, SCH# 2021070473) for public review on July 26, 2021. The IS/MND identifies mitigation measures with which Rise, as the property owner responsible for implementing the Centennial M1 Property Clean-Up Project Remedial Action Plan (Centennial Clean-Up Project) would need to comply, prior to and during remedial activities associated with the RAP, that would ensure that physical impacts to the environment are mitigated to a less-than-significant level. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The comment does address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 285-3

Please see Master Response 4.

Response to Comment Ind 285-4

Please refer to Chapter 4.10, Noise and Vibration, regarding impacts related to noise. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 285-5

Impacts related to light and glare were addressed in Impact 4.1-3 within Chapter 4.1, Aesthetics, of the DEIR. As discussed therein, light spillover is not projected to occur off-site. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency, such as lighting requirements, in deciding whether to approve the project.

Response to Comment Ind 285-6

The comment is a general comment about significant and unavoidable impacts, stating they should be monitored over time. Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Program for all required mitigation measures and the site will be inspected annually as required by SMARA. The comment does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 285-7

Long-term changes in visual character associated with the proposed project in combination with cumulative development and the creation of new sources of light or glare associated with the proposed project in combination with cumulative development are discussed under two separate impact statements, as shown in Chapter 4.1, Aesthetics, of the DEIR. As the commenter noted, Impact 4.1-4 related to long term changes in visual character was determined to be cumulatively considerable and significant and unavoidable (DEIR p. 4.1-30); however, Impact 4.1-5 related to the creation of new sources of light or glare was determined to be less than cumulatively considerable (DEIR p. 4.1-32).

Individual Letter 286

From: Harry Woodum
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Monday, March 21, 2022 3:49:35 PM

Dist 1

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To the Board of Supervisors:

Hello,

I hope everyone has managed to stay well during the last couple of years. We have faced many big challenges in the last few years, the pandemic, climate change and drought ramping up wildfire season and all that that brings, to name just a few.

I have been a Nevada County resident for 30 years.

As residents of this community, we are now facing another big challenge that some might even call a crisis. I am referring to the proposal to re-open the Idaho-Maryland mine.

This looms so large; I don't even know where to begin but I will try to be brief. I know there is much to consider and I'm sure, I hope, you have heard from a lot of residents. To me, it's a real no-brainer that it even requires any consideration.

Ind 286-1 I have received brochures in the mail from Rise stating just how little impact the mine would have on the area and it could not be anymore obvious that it is a sales job and a bad one at that, driven by the desire for money. It's a sales job by a company whose members live thousands of miles away and have no connection to or concern about this community. The desire to make money trumps all sense of integrity, morals, and responsibility to the people who live here.

There are many arguments against the mine and I can't think of any arguments in favor of it that justify the long-term permanent damage and destruction to a place people call home. I'm sure by now you have been informed about the impact of the process in much greater detail than I could ever provide.

This is not an industrial area and this proposal is counter to what makes this area such an appealing and attractive place to live. The arguments against are obvious, like excessive water usage that cannot be replenished, air pollution not only from the mining process itself, but from the constant truck traffic needed for transport, and the 24-hour noise levels that will drastically change

the environment for residents.

Speaking of wildfires, drought and water depletion, I think water usage alone is enough reason to say NO. I read a report that stated this process would use 700 million gallons of water in six months and we know that it will be pulling from the aquifer or will directly affect it. That is 700 million gallons that will in all likelihood, never be replaced when taking into consideration the long-term projections of climatologists regarding drought and declining snowpack. That is 700 million gallons that our ever-growing population needs for everyday living. That is 700 million gallons that we desperately need during fire season which is becoming longer and longer. That said, I don't know how reopening the mine could even be a remote possibility.

Ind 286-2

Ind 286-3 And how much would truck traffic impede fire evacuation?

The member-owners of Rise are too disconnected from this community to even have a voice. Would they want to live in the middle of an industrial area? Do they currently live in the middle of an industrial area? Perhaps that should be a pre-requisite before this could ever happen. Maybe they should be required to become permanent residents/homeowners who actually live here directly in the path of all the traffic and noise. I wonder how they could justify such a project then.

Ind 286-4 To sum up and reiterate, I believe it is imperative that we put environment above profit, profit that will most benefit Rise member-owner/investors who live far away and who will be unaffected by the destruction of what the community here calls home. The investors stand to gain a lot, while we stand to lose more than can ever be recovered and, in the end, will experience destruction that far outweighs any ultimate financial gain. No amount of money or addition of jobs can compensate for the air, ground, water and noise pollution, disruption to community, devaluation of residential property, and overall environmental destruction that will affect this area for generations.

As residents here, I implore you to take the long view into account when making your decision.

Thank you and best regards,

Harry Woodum

INDIVIDUAL LETTER 286: HARRY WOODUM

Response to Comment Ind 286-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 286-2

Please refer to Chapter 4.8, Hydrology and Water Quality, as well as Chapter 4.11, Public Services and Utilities, of the DEIR for more information related to impacts regarding water usage. Please also refer to Master Response 13 through 16 regarding groundwater. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 286-3

Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 286-4

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 287

From: Wyeth, Harry
To: Idaho MMEIR
Subject: RISE GOLD Draft Eir Comment
Date: Wednesday, March 16, 2022 7:43:13 AM

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Ladies/Gentlemen:

Please accept the following individual comment on the portion of the draft EIR on this proposed project identified on page 253 in section 4.1-5, dealing with "new sources of light or glare".

Ind 287-1

The conclusion reached in the DEIR is that "the project's contribution to the significant cumulative impact [of light pollution] would be "**cumulatively considerable and significant and unavoidable**" [emphasis original] (section 4.4.4). Yet, the following section reasons that the cumulative lighting impact would be "**less than…considerable**" (page 253).

The inconsistencies are obvious, and the overall reasoning of the total effect of lighting from the mining site is poor. The mine site has almost no lighting at present, and the general area is dark-sky friendly, quiet, and serene. Not only would construction and operation of the mine dramatically change this, the presence of nighttime lighting, not matter how shielded, would cause a serious increase in lighting and a huge and serious detrimental effect on aesthetics.

The DEIR is deficient in these matters.

HARRY B. WYETH
14393 Osborne Hill Rd.
Grass Valley, CA 95945
530-798-6566

INDIVIDUAL LETTER 287: HARRY WYETH

Response to Comment Ind 287-1

The commenter is comparing conclusions to two different impacts. Impact 4.1-4 related to long term changes in visual character was determined to be cumulatively considerable and significant and unavoidable (DEIR p. 4.1-30); however, Impact 4.1-5 related to the creation of new sources of light or glare was determined to be less than cumulatively considerable (DEIR p. 4.1-32).

Individual Letter 288

From: Heidi Belforte Breuer <heidipi85@yahoo.com>
Sent: Thursday, March 24, 2022 9:43 AM
To: Idaho MMEIR
Subject: Opposition to Idaho Maryland mine

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Hello,

Ind 288-1 As a Grass Valley resident and voter, Im writing to voice my significant concerns regarding the proposed Idaho Maryland mine. I am a constituent in Heidi Halls jurisdiction. I am gravely worried about findings in the mine's environmental impact report. The impacts to air via pollution, noise due to mining activities (trucks, explosions etc), and truly unknown

Ind 288-2 impacts to water supply are all unacceptable. These impacts will be extremely difficult to mitigate. As we enter into another draught year with unknown outcomes, we cannot predict with scientific means the long term effects over 80 years and I thus distrust the thoroughness of this EIR.

I hold a bachelors degree in zoology from UC Davis and have studied animal habitat management. The EIR did not study impact to birds, animals and other creatures beyond the site. Im convinced that there will be impacts beyond the mine grounds to our natural environment in surrounding areas.

Ind 288-3 Please do not allow this abomination. Grass Valley is not the right place for this potential rape of our land.

Kind regards,

Heidi Belforte Breuer
18354 Raccoon Trail
Grass Valley

INDIVIDUAL LETTER 288: HEIDI BREUER

Response to Comment Ind 288-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 288-2

Impact to birds, animals, and other creatures is addressed in Chapter 4.4, Biological Resources, of the DEIR. Please see Master Response 30 – Biological Study Technical Adequacy and Master Response 37 – Birds and Raptors. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959

Ind 289-1

I am concerned about the increase in traffic, asbestos release, and noise/vibrations if the Idaho Maryland mine were reopened. . I live near the proposed mine, just above Union Hill School and next to Empire Mine State Park. I have lived in my home for over 40 years. I am able to currently hear noise from the mine area and intersection at Brunswick as well as along highway 174.

I find the DEIR is inadequate in how it collected data and proposed mitigations in the areas of increased traffic, the release of asbestos from rock, and the noise the mining operation will generate.

Ind 289-2

The DEIR in the Wildfire chapter identifies the following expected traffic each day for haul trucks and transports for waste rock (see below). *This list does not include the cars of employees coming and going, other service vehicles making deliveries, picking up items or performing inspections and audits.*

Chapter 4.13 – Wildfire Page 4.13-16 & 17 (pdf pages 382-385)

- the average transport of engineered fill will be 1,000 tons per day
- Truck payloads will be approximately 20 tons per truck and therefore will require up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM). (*NOTE: Is it 100 one-way trips that when driven out and back become 50 round trips?*)
- Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.)
- approximately five years, trucks would transport barren rock from the Brunswick Industrial Site to the Centennial Industrial Site or Brunswick Industrial Site engineered fill areas. 7 days a week/16 hours per day
- After full placement of fill at the Centennial and Brunswick Industrial Sites to the pad design elevations, the need for hauling of engineered fill would continue due to ongoing mining over the use permit term of 80 years, and thus, hauling would shift entirely to local and regional markets, with the maximum truck trips per day remaining at 100, with a daily average of 50
- Off-site haul of gold concentrate will average one truck trip per a day using Brunswick Road to SR 20/49.
- Hauling of fuel and other freight, including explosives, would occur using Brunswick Road to SR 20/49.
- Over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week.

That is a tremendous amount of traffic to add to a secondary arterial. Its also a tremendous amount to go through mostly residential neighborhoods. That much constant large truck traffic

and the noise they generate and additional personal vehicles has a negative impact on the traffic flow and visual aesthetics along Bennett and Brunswick.

Ind 289-3

When Rise investigators looked at Nevada County intersections that Rise considers in planning its routes, the LOS rating was D or better and was a C in rural regions. (pdf page 877) But when the additional traffic is added from mining operations, the LOS will decrease.

Ind 289-4

The plan to safeguard against asbestos airborne release in the removal, transport, and dumping of waste rock is not adequate. The plan by Rise assumes that the asbestos content will continue to be less than 0.01% (3-20). That assumption may not hold true for the actual rock removed. Testing for the actual content percentage may take significant time and there is nothing in the plan that says Rise will stop the operation until that data is determined and then have workers return to work. If these tailings were dumped at Centennial or on the Brunswick site it is unclear how the asbestos will be abated. Spraying with water for dust control will only work as long as the dust stays wet and wind isn't an issue. The plan described in the DEIR lacks descriptions of testing and controlling for the significant health hazard, asbestos.

Ind 289-5

In addition to greatly increased traffic, the noise of blasting, crushing and processing the rock will be increased as well. Now the noise from the Brunswick /Bennett-Greenhorn area can be heard from my home above the mine and next to Empire State Park near Union Hill. Friends on Banner Mountain can hear noise where he lives. The sensors were placed near the borders of the mine sites but the sound tends to carry much further and often is deflected up the hills. Secondly, as people have made a great effort to remove ladder fuel and thin trees, noise from traffic and the airport is much more noticeable. The data used is from the summer of 2018 and December 2018. New surveys should be conducted to determine the new ambient noise levels in the existing sensor areas and more that move up in elevation. Then recalculated to include nearly 8 diesel trucks an hour and the noise of heavy equipment, crushers, blasting and generators. The current data is inadequate for the area today.

Ind 289-6

Another concern is the 6 am to 10 pm window for excessive noise and/or vibrations from the mine transporting waste fill, blasting and processing. It seems that residents should be able to have reasonable quiet for the evenings in their homes and outside in their yards.

Respectfully,

Helen Carl Martini
Gerald Martini
11613 Lower Pine Hill Drive Ext
Grass Valley, CA 95945

INDIVIDUAL LETTER 289: HELEN AND GERALD MARTINI

Response to Comment Ind 289-1

The commenter states that the DEIR is inadequate in the areas of traffic, asbestos and noise but provides no specific reasons for inadequacy. The commenter is referred to Chapters 4.12 (Transportation), 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and 4.10 (Noise and Vibration) of the DEIR. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 289-2

The commenter states that the DEIR fails to analyze traffic impact from employees commuting to the project site. Traffic impacts, including employee and service vehicles, are extensively analyzed in Chapter 4.12 (Transportation) of the DEIR. The commenter is referred to Table 4.12-8 and Table 4.12-9. The commenter is also concerned about traffic noise generated from the project. Noise from traffic is analyzed in Chapter 4.10 (Noise and Vibration) in the DEIR. The aesthetic effect of trucks traveling along the surrounding roadways is a temporary condition and does not result in a permanent change in the overall aesthetics of the surrounding area. Project traffic on Brunswick Road would be from trucking (6:00AM to 10:00PM) and employees during shift change. Over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road.

Response to Comment Ind 289-3

The commenter states that the DEIR indicates Level of Service (LOS) will decrease with the addition of project traffic. The LOS for each individual intersection studied in the DEIR varies and is not consistently LOS D or C, as stated by the commenter. The addition of traffic from mining operations does not lower the LOS of most intersections analyzed. The commenter is referred to Chapter 4.12 (Transportation) of the DEIR.

Response to Comment Ind 289-4

The commenter states that the DEIR's analysis of asbestos impacts is inadequate. Detailed descriptions, analysis, management plans, and mitigation measures for the management of asbestos are provided in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. Prior to underground gold mining, intensive planning efforts will be conducted as required under the ASUR plan and as required to meet state and federal regulations and achieve safety, environmental, and economic goals. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the EIR). Underground mine planning, as required in the ASUR plan, includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos to ensure that applicable thresholds are not exceeded. (Id.) In other words, the mandatory mine planning that is required by the DEIR in the ASUR Plan will provide information to the mine operator on asbestos content of rock prior to mining that area. That information can then be used to avoid areas, if any exist, with asbestos content that would make it infeasible to comply with the 0.01% asbestos content limit required by the ASUR Plan.

The commenter is also referred to Master Response 22 – Conservatism of Asbestos Assumptions, and Master Response 23 – Adequacy of sampling – Asbestos.

Response to Comment Ind 289-5

The commenter is concerned about noise impacts from the blasting, crushing, and processing of the underground mining operation. The commenter also states that the DEIR's noise data is outdated and new surveys should be conducted. Regarding the noise impacts, no crushing of rock is proposed on the surface. The remaining noise impacts related to the operation at the Brunswick site were analyzed in Chapter 4.10 (Noise and Vibration) and impacts were found to be less than significant. The commenter is also referred to Response to Comment Ind 617-4.

Response to Comment Ind 289-5

The commenter is concerned about noise impacts of the project but does not state how the DEIR is inadequate. Noise impacts, except for the construction of the water pipeline, have been determined to be less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR.

Individual Letter 290

From: Holly Ahrens <hollywoodnot@gmail.com>
Sent: Wednesday, March 23, 2022 8:44 AM
To: Idaho MMEIR
Subject: Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Mr. Kelly:

My name is Holly Ahrens and my husband and I have been residents here in Nevada County for 17 years. The great outdoors and the natural habit drew us to this fabulous area.

I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

Ind 290-1

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely

Holly Ahrens

1

INDIVIDUAL LETTER 290: HOLLY AHRENS

Response to Comment Ind 290-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment also notes that there is no independent monitoring of these issues, but does not make clear to what issues are being referred. All of the technical reports used to support the preparation of the DEIR were independently peer reviewed by technical experts hired through the County. In addition, on-going inspections of the site will occur annually as required by SMARA. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 291

March 23, 2022

Nevada County Planning Department
950 Maidu Avenue, Ste 170
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To whom it may concern:

My name is Holly Ahrens and my husband and I have been residents here in Nevada County for 17 years. The great outdoors and the natural habit drew us to this fabulous area.

Ind 291-1 I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely

Holly Ahrens

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 291: HOLLY AHRENS

Response to Comment Ind 291-1

Please see Response to Comment Ind 290-1.

Individual Letter 292

From: Hunter Jones <hunterdjones1@gmail.com>
Sent: Monday, April 4, 2022 3:55 PM
To: Idaho MMEIR
Subject: DEIR - letter of opposition to proposed mine

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Dear Mr. Kelley,

This letter is to add my own opposition to the proposed Idaho Maryland Mine.

Ind 292-1

I grew up in Nevada County and have benefitted from it in nearly every way imaginable, through its environment, culture, and the prosperous business community, which has allowed for me to build a life here.

Many have brought up the many flaws in the DEIR, from flawed data and projections, to glaring omissions, and tremendous flaws portrayed as minor hurdles.

All of these are important and valid, but I would like to suggest that there are some broader issues at play here. To cite a cliche, Rise Gold has no stake in Nevada County. Their stake is in Nevada County's resources, which they will exploit at our expense, and then they will leave.

Unfortunately, if we cannot look to Hirchman's Pond, Malakoff Diggins, or other toxic, mercury-laden sites and see them for what they are, and learn from their history, we are doomed to repeat it. Our environment, locally and globally, is tenuous. To suggest that mining is part of our legacy is as enlightened as suggesting that slavery is a fundamental american value. It is a part of our history. We have to reckon with the damages of the past, and fight to not repeat those mistakes.

Ind 292-2

Likewise, our community cannot withstand an additional influx of traffic and commotion. The few jobs that will be created will mostly not be given to locals. Those that are given to locals will be fewer. They will tell you anything you need to hear, and when they fail to deliver, they will apologise and move on. A corporation cannot be held to account. They only exist to make money, and they will do everything in their power to succeed.

Furthermore, much has been said about tax benefits and tangential or serendipitous consequences to local business as a result of the few jobs that will be created. All of this implies that our county is desperate for funds. This is simply not the case.

Ind 292-3

We are not desperate. We don't need to bet everything on remote potentialities. Allowing Rise Gold, a company with no accolades, not history beyond bankruptcy, and no stake in our region to come in and exploit this area is cowardly and blatantly ignorant, given the history we all know.

Please do not force our county to endure another mining project when we don't need it, don't stand to benefit from it, and when we are still recovering from the last iteration of this practice.

Thank you very much for taking the time to read and consider my letter of opposition to the proposed mine.

1

Sincerely,
Hunter Jones
15588 Airport Road
Nevada City
530-205-7714

Ind 292-4



INDIVIDUAL LETTER 292: HUNTER JONES

Response to Comment Ind 292-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 292-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 292-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 292-4

The referenced book does not address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 293

April 3rd, 2022

To: Members of the Nevada County Planning Commission,
Nevada County Board of Supervisors,
and Nevada County Planning Department Staff
Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
matt.kelley@co.nevada.ca.us

To All Concerned:

Comments on Heavy Metals toxicity and Centennial Site
Inge Ivens, Ph.D., retired member of the American Board of Toxicology

I have provided 2 comments below specific to inadequacies in the draft environmental impact report. I am expressing my own opinion and use my expertise as a trained biologist and toxicologist. I am a resident of Nevada City as of 2019 (10863 Willow Valley Road)

Ind 293-1

I have a masters degree in Zoology and Plant Physiology and a Ph.D. in Neurobiology. In addition I have many years of training and experience in various areas of Toxicology, which include evaluating the impact of mercury compounds on human health.

Thank you for the opportunity to comment on the draft environmental impact report for the Idaho-Maryland Mine Project (SCH# 2020070378).

Generally, I am of the opinion that the Rise Gold mining proposal will destroy the recognition of Grass Valley and Nevada City as tourist designations. Even "modern" gold mining is not a clean industry compared to tourism. Both cities and the surrounding Sierra Foothills are still addressing the environmental impact of old mining operations from more than 100 years ago and creeks and streams are contaminated with heavy metals.

I hope that the Planning Commission has our future jot the past in mind and will not get blinded by shiny gold and brochures.

Comment 1
Issue identified

Ind 293-2

The long-term impact of accumulation and release of Arsenic from the mine operations is of concern since Arsenic compounds are human carcinogens and aquatic toxins. The draft environmental impact report (DEIR) does not take the long-term impact of released Arsenic and other toxic metals into account.

The number of current samples and the data on Arsenic levels in current mine water, as well as levels of Arsenic in existing rock and tailings at the Brunswick site are insufficient. For example page 590 and Figure 4.7-1 of the DEIR discusses elevated levels of Arsenic at one part of the Brunswick site. The report says *"the material beneath this southeastern paved area was likely imported to the site and did not originate from mining operations at the Brunswick Mine Shaft"*. This is speculation and more areas of the site need to be assessed for toxic metals including Arsenic compounds.

As known from local history, high Arsenic concentrations are associated with nearby mining sites.

Action needed

- Figure 4.7-1 of the DEIR indicates that less than half of the Brunswick site was sampled for toxic metals. Comprehensive data on Arsenic levels and levels of other toxic metals for example Mercury (Hg) in soil and rock of the entire Brunswick site are needed to conduct a risk assessment.
- There needs to be concurrent measurements in place to evaluate As and other potential contaminants in mine tailings and the industrial fill proposed to be deposited at the Brunswick and Centennial sites.
- As and other contaminant levels should be determined in rock/engineered fill before it is used as building material.

Ind 293-3

Background

Arsenic is commonly a contaminant of concern in lode Au mine waste, including waste rock and mill tailings.

Arsenic compounds are carcinogenic and also have other toxicities. The **International Agency for Research on Cancer (IARC), the US National Toxicology Program (NTP) and the US Environmental Protection Agency (EPA)** list Arsenic as human carcinogen. For more detailed information, see the IARC monograph Arsenic and Arsenic Compounds. The EPA classifies inorganic arsenic as a "human carcinogen," based on evidence in human studies of links to lung, bladder, kidney, skin, and liver cancers.

The Arsenic concentrations in arsenian pyrite in waste-rock samples from Empire State Mine Historic Park ranged from <0.04 to 5.1 wt%, with a median value of 0.51 wt% based on more than 500 EMPA observations (Reference 1).

At the Lava Cap Mine in. Grass Valley (current superfund site) mine waste, ore, and contaminated sediments had average As concentrations in the range of 500 – 1500 mg kg−1 (= 0.5 – 1.5 wt%) (Reference 2).

2

The EPA limits the maximum level of arsenic allowed in US drinking water to 10 micrograms per liter (µg/L), or 10 parts per billion (ppb). Further the EPA has set limits on the amount of arsenic that industrial sources can release into the environment.

Relevant References to Draft Environmental Impact Report (DEIR)

- Page 34, 4th bullet (Centennial site): " Extensive site investigation, overseen by DTSC, has identified mill tailings, waste rock and affected soil at the site that contain lead, arsenic, mercury and other metals at concentrations exceeding background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species."
- Table 2-1 (points 4.7-2; 4.8-1)
- Pages 534, 586, 588, 590

Ind 293-4

Comment 2
Issue identified
The DEIR misses to address the hazardous conditions of the Centennial site and respective actions and their cleanup. Hazardous levels of As (see above), lead, nickel, cyanide (free), nickel and mercury are present in the soil of the Centennial site. There is currently no proposed plan nor money for the cleanup of this site that shows how this can be done safely (*Note: post-project Superfund cleanup of nearby Lava Cap has cost more than one million dollars per year so far for the past decade. Centennial cleanup would likely be similar in expense (cost estimates come directly from EPA)*).

Action needed
The DEIR needs to address the cleanup of the Centennial site before being used by Rise Gold.

Background
The Centennial site ranked 1st as the top priority abandoned mine sites by the EPA, because of the proximity to Grass Valley and also because of the known contamination and physical hazards that are on site.

Its Superfund designation has been conditionally deferred for the time being because Rise Gold signed a contract with the California Department of toxic substance controls to clean up the site. This has to happen before any gold mining operation can start (*Reference 3*). More recent reports from the DTSC determined that lead, arsenic, nickel, cyanide (free), nickel and mercury are present at hazardous levels. Contaminated tailings cover roughly 2/3 of the 56.4 acres with depths ranging from 2 to 20 feet at the Centennial site.

References
1 *Burlak, T.L. 2012. The mineralogical fate of arsenic during weathering of sulfides in gold-quartz veins: a microbeam analytical study. MSc thesis, California State University,* Sacramento,

https://www.yumpu.com/en/document/view/16475309/the-mineralogical-fate-of-arsenic-during-weathering-

2 *Foster & Ashley 2002; Foster et al. 2011, see Arsenic and mercury contamination related to historical gold mining in the Sierra Nevada, California; Charles N. Alpers. 2017 US Geological Survey. Published by The Geological Society of London for GSL and AAG.*

3 *Minewatch 2021; Yubanet 2020: https://yubanet.com/regional/facing-epa-superfund-designation-rise-gold-compelled-to-cleanup-existing-idaho-maryland-mine-tailings*

INDIVIDUAL LETTER 293: INGE IVENS

Response to Comment Ind 293-1

This is an introductory comment, expressing general concerns. Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter's specific comments are addressed in Responses to Comments Ind 293-2 through Ind 293-4.

Response to Comment Ind 293-2

The commenter states the DEIR does not take the long-term impact of released arsenic and other toxic metals into account. Metal content in dust generated by all activities of the project were evaluated in the Health Risk Assessment. Please see Chapter 4.3 and Appendix E.1 of the DEIR. Please see also Master Response 20 – Conservatism used for Metals in Dust.

The commenter states that the number of current samples and data on arsenic levels in current mine water is insufficient. Water samples have been taken in the Brunswick shaft and from the mine drains along Idaho-Maryland Road. The water treatment plant is designed to treat arsenic, if necessary, and an NOA is required for the mine water discharge to ensure that the discharged water meets applicable water quality standards. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter states that the number of samples for arsenic in existing rock and tailings at the Brunswick site is insufficient and that half of the Brunswick site was not sampled for toxic metals. The commenter believes that the source of the area of elevated arsenic on the Brunswick site, as stated by NV5, is speculative. Figure 4.7-1 of the DEIR shows sampling locations conducted by NV5 inside the estimated boundary of historic waste rock fill as delineated on the figure. Areas outside of the sampled area of the Brunswick site either would not be disturbed by the project or are not potentially contaminated with historic mine waste rock. Therefore, the sampling of these areas of the Brunswick site is not necessary. As discussed on page 15 of the Phase I-II ESA, the mine waste rock reportedly originated primarily from the New Brunswick Mine portion of the Idaho-Maryland Mine, which is known to have low arsenic concentrations, and also from the Empire Mine, which is known to contain elevated arsenic concentrations (see page 15 of Appendix J of the DEIR). As discussed on page 38 of the ESA, the mixed soil and rock fill beneath the southeastern paved area contain total and soluble arsenic concentrations that exceed regulatory benchmarks. Based on the higher arsenic concentrations and anomalous acid Based Accounting (ABA) results for this material, the geotextile fabric incorporated into the fill, and historical aerial photographs that suggest the grading was performed after mining operations were suspended, the material was likely imported to the site and did not originate from mining operations at the New Brunswick Shaft. As such, the DEIR's conclusion is based on evidence, not on mere speculation.

The commenter states that high concentrations of arsenic are associated with nearby mining sites. However, the Idaho-Maryland Mine is a different gold deposit and hosted in different rock types than the Empire-Northstar and Lava Cap Mines. Arsenic levels from samples taken in various rock types at the Idaho-Maryland Mine Project are low. (see Section 4.4 of Appendix K.2 of the DEIR.)

The commenter states that there needs to be concurrent measurements to evaluate metals in engineered fill proposed to be placed at the Brunswick and Centennial sites and that metals content should be determined before it is used as building material. A WDR is required prior to placement of engineered fill. Please see Master Response 8 – Mine Waste Characterization, and Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 293-3

The commenter explains the toxicity of arsenic and cites arsenic concentrations from the Empire State Mine and the Lava Cap Mine. However, the Idaho-Maryland Mine is a different gold deposit and hosted in different rock types than the Empire-Northstar and Lava Cap Mines. Arsenic levels from samples taken in various rock types at the Idaho-Maryland Mine Project are low. Please see Section 4.4 of Appendix K.2 of the DEIR.

Metal content in dust generated by all activities of the project were evaluated in the Health Risk Assessment for the DEIR. Please see also Master Response 20 – Conservatism used for Metals in Dust.

The commenter also cites the EPA standards for arsenic levels in drinking water. The MCL for arsenic in water is noted and is discussed in the DEIR and in Appendix K.2 of the DEIR. (see DEIR, p. 4.8-21.)

Response to Comment Ind 293-4

As discussed in the DEIR, the Project Applicant has entered into a Voluntary Cleanup Agreement with the California Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on Centennial Industrial Site. A Remedial Action Plan (RAP) has been prepared and is under review by DTSC. The DTSC project is a separate project from the Idaho-Maryland Mine Project, is not under the authority of the County, and is subject to its own separate CEQA review. As such, the cleanup project is not the proper subject of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

The Centennial site is not designated, nor under consideration to be listed, as a “superfund site” by the US EPA. The estimated total capital cost for clean-up of the Centennial site is estimated in the RAP at $3 million (see page 53 of the Draft Final RAP).

The proposed project would likely produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 – Historical Mine Waste at Centennial Site.

Individual Letter 294

From: Irene Frazier
To: bdofsupervisors
Subject: Proposed Mine
Date: Wednesday, February 16, 2022 3:45:00 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 294-1

Dear Board of Supervisors,

Please add my voice to those who oppose the Rise Gold Mine development. I have numerous concerns about this project and its impact, both on the environment and on our current economic strengths.

We are a small community that values our tourism, light industry and tech businesses. As our housing market shows, people are flocking to Nevada County to work remotely, and our environment is paramount in attracting these new people. (Broadband would attract even more!) While we have a rich mining history, it no longer fits with our current culture. Since those early days, homes have sprung up around the county that would be affected by any mining operation. What other industry would be allowed to threaten clean ground water or create toxic runoff?

We are so lucky to have such a beautiful county. Please help us keep it that way.

Thank you for your service.

Sincerely,

Irene Frazier (40 year resident)

Grass Valley, CA

INDIVIDUAL LETTER 294: IRENE FRAZIER

Response to Comment Ind 294-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 295

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Nevada County
APR 01 2022
Community Development
Agency

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902
or in email Idaho.MMEIR@co.nevada.ca.us

Itara O'Connell
19960 Sunshine Charlie Dr.
Grass Valley, CA 95945
to.itara@gmail.com

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 28, 2022

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902

RE: Draft Environmental Impact

Ind 295-1 The first section of the DEIR should reflect the reliability of the company's ability to follow rules. We know this CEO is either ignorant or lying when he says, "There will be no environmental impact from the mine. " Also he does not have a good track record. How can we put our community at risk?

Ind 295-2 The Centennial Site: "The soil clean up activity would be completed before implementation of the project related activities at the Centennial Site, removing contaminated surface soils, contaminated trees, and other vegetation on a large portion of the property & creating an elevated pad area where the consolidated soil would be collected and capped."

Ind 295-3 4.7-4 Impair implementation of or physically interfere with an adopted emergency evacuation plan. The DEIR says "Less than significant" I'd like clarification on why this wouldn't be significant given that Brunswick is one of the few evacuation corridors and evacuating over 600 people on to one of the few evacuation corridors seems significant to me. How will this evacuation occur?

Ind 295-4 4.5-4 Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native Tribe.

I did not see an interview with the Nisenan Tribe as to how they ascertained that this was insignificant. An interview with the tribal leaders should be included in the

DEIR. In 1849 the Nisenan Tribe was nearly exterminated during that gold rush. The mine is in fact on stolen land.

4.9-1 Physically divide an established community. This is considered "Less than significant." A major industry with an insurmountable number of risks will surely

Ind 295-5 divide this community from our quaint tourist town to a major divide between the tourist section and the polluted industrial section. (If it's not polluted, why are the tires washed when leaving the site?)

4.12-6 The project applicant shall obtain an encroachment permit from Nevada

Ind 295-6 County to install a "Slow trucks" sign on the road. The sign should face the industry and read- "cars on the road, trucks use caution before entering."

4.1"That a project is visually inconsistent with the surrounding community"
1. Buildings 165' tall are inconsistent with the rural/neighborhood setting setting.
2. Trucks entering the highway 16 hrs a day for eighty years are visually inconsistent with our beautiful community.

Ind 295-7 3. Lights on at night will be visually inconsistent with the night sky in our rural area.

4. The Centennial Site: "The soil clean up activity would be completed before

Ind 295-8 implementation of the project related activities at the Centennial Site, removing contaminated surface soils, contaminated trees, and other vegetation on a large portion of the property & creating an elevated pad area where the consolidated soil would be collected and capped." This will be ugly, and will visually not fit in to the surrounding community.

Sincerely
Tina O'Connell

INDIVIDUAL LETTER 295: ITARA O'CONNELL

Response to Comment Ind 295-1

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 3 – Owner Responsibility.

Response to Comment Ind 295-2

The comment restates a sentence in the DEIR regarding the Centennial Site, but provides no context which would allow a response.

Response to Comment Ind 295-3

Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 295-4

Please see Chapter 4.5, Cultural and Tribal Cultural Resources, and, specifically, the following excerpt from page 4.5-21 of the DEIR:

> […] InContext contacted the NAHC on September 10, 2019 to request a search of the Sacred Lands File for tribal cultural resources within or near the project area. The results of the Sacred Lands File search were negative, which indicates that known cultural resources do not exist on the project site.[5] In addition, InContext contacted each of the following Native American tribes with the potential to have knowledge of cultural resources in the project area:
>
> - Colfax-Todds Valley Consolidated Tribe;
> - Tsi Akim Maidu;
> - United Auburn Indian Community of the Auburn Rancheria (UAIC); and
> - Nevada City Rancheria Nisenan Tribe.
>
> In an effort to gather data regarding cultural resources of importance to these entities that could be affected by the project, the above parties were contacted via regular mail, email, and telephone between September 16, 2019 and December 16, 2020. Reponses were not received from any of the above tribes.
>
> On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, Nevada City Rancheria Nisenan Tribe, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. The UAIC responded on December 18, 2019, and requested consultation and copies of the Cultural Impact Report, technical reports, requests for and results of records searches, and Geographic Information System (GIS) Shapefiles. The County provided such information. In addition, the UAIC noted that they are not aware of any Native American archaeological sites in or near the project site.

As presented above, consistent with CEQA Guidelines and Assembly Bill 52, as part of the DEIR process, local tribes were notified and invited to consult on the proposed project, and such information was presented in the DEIR.

Response to Comment Ind 295-5

A project risks dividing an established community if the project would introduce infrastructure or alter land uses so as to change the land use conditions in the surrounding community, or isolate an existing land use. As discussed under Impact 4.9-1, the proposed project would operate on land designated for industrial use and currently used to store industrial materials on both the Brunswick and Centennial Industrial Sites. The project would not affect access to the nearby roadways and would not change access to a nearby community from these roadways. Therefore, the proposed project would not physically divide an established community.

Response to Comment Ind 295-6

The comment expresses a general opinion that Mitigation Measure 4.12-6(e) shall be revised such that the sign installed would face the industry and, “cars on the road, trucks use caution before entering.” The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 295-7

Long-term changes in visual character associated with the proposed project were discussed in Chapter 4.1, Aesthetics, of the DEIR. As noted therein, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. According to CEQA Guidelines Section 15093, if the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." As such, the County would be required to adopt a Statement of Overriding Considerations to address the aforementioned significant and unavoidable impact.

Impacts related to light and glare were addressed in Impact 4.1-3 within Chapter 4.1, Aesthetics, of the DEIR. As discussed therein, light spillover is not projected to occur off-site. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency, in deciding whether to approve the project.

Response to Comment Ind 295-8

The DEIR concludes that impacts to visual character of the site would be significant and unavoidable. In addition, please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Individual Letter 296

TO: US Department of Interior, Bureau of Safety and Environmental Enforcement

Necada County, CA Idaho.MMEIR@co.nevada.ca.us

RE: A proposed project in Nevada County, CA, to re-open a mining operation, named the "Idaho-Maryland Mine Project. (IMMP)"

OBJECTIVE: Submitting a comment to Nevada Coty and reporting an instance of intended, inappropriate land-use to state- and federal authorities.

PROJECT SUMMARY

Ind 296-1

The project involves the re-opening of a mining operation in Nevada County, CA, near Grass Valley, CA. It promises moderate impact on the environment and substantial benefit to the local economy. However, massive quantities of surface water are to be utilized, there will be substantial pollution from dust and smog, and great amounts of mining gravel must be disposed of.

DISCUSSION

From the Environmental Impact Report Draft:

"Six impacts in this category are listed as either "less than significant," or "less than cumulatively considerable" prior to mitigation, with no mitigation measures required, while another — the generation of greenhouse gas emissions that may have a significant impact on the environment — is listed as "cumulatively considerable" prior to listed mitigation measures and "less than cumulatively considerable" afterward." https://www.theunion.com/news/report-delves-into-idaho-maryland-mine-project/

Ind 296-2

In a time in which natural resources are swiftly depleting due to human activity, in which yard-thick trees are snapping like tooth picks in the wind due to air quality issues, dry climate, and subsequent parasite infestation, an "Environmental Impact Study" ought to entail somewhat more than a utility to push for the venture's ultimate approval. Arguments like "economic growth" belong to an era which has ended some time ago. If one raises his head and looks beyond the luring local kudos such a project might bring to the area, and considers the global ramifications of what is being planned, he/she is bound to realize that there exists no need for any more economic growth, for further population influx, and foremost of all, no need for MORE GOLD!

About Gold:

The United States possesses some 8,000 metric tons of raw gold, which lays uselessly in its bunkers. https://tradingeconomics.com/country-list/gold-reserves.The proprietors of the IMMP might sooth their desires by utilizing their funds to purchase some of it.

Via its replacement with inferior metals, later with celluloses, and finally with nothing more than electronic data, gold's function of serving as primary currency has long ended and it further on provides no essential value to humans.

Project Evaluation:

Proper project evaluation starts with determining the proposal's feasibility and merit. Although the IMMP might well be practicable (it primarily takes logistical efforts; no extraordinary managerial skill or leadership are required to re-initiate a previously abandoned endeavor), it features absolutely no merit. The pursuit of a fictitious value bares no necessity the local community or the environment.

Ind 296-3

A business project preposition ought to come about upon verifiable, local need for the venture's intended product. Proposing to restart a venture within an industry segment whose prior stint's rubbish is still corrodingly littering Grass Valley's surrounding forests, is simply childish – Cleaning up one game prior to beginning another, is taught in preschool.

Indirect Merits / Pre-existing Environmental Conditions:

The aspect of providing employment to local resident, swiftly loses momentum when one considers that the global human population is growing at a rate of 100 Million per annum, along with it all the waste and pollution that humans produce. A sincere political leader's prospective should thereupon shift from providing for a growing population, to CONTROLLING ITS HEAD COUNT!

It is no longer an idealistic "tree-hugger" standpoint to earnestly consider one's very own actions in respect to environmental impacts. Since the past several decades, human activity has pushed the global biosphere's integrity to the brink of collapse. Thereupon it becomes obvious that the planet does not need any more symbolism, technology, industry, or humans! And ironically, not even human civilization can utilize any more of these "commodities." What civilization needs to recover from this self-created misery, is *sophistication* instead of quantitative growth. Granted, mankind has come forth with some brilliant scientists, engineers, and architects; Nevertheless, if they keep using their talents against Nature, their cumulative IQ remains somewhere below that of a maggot or a blob of chicken snot.

Ind 296-4

Due to extensive drought conditions, the local flora is severely dry, surface water scarce, and the summers are getting hotter each year. This is due to air and water pollution generating a greenhouse effect, and mining-, quarrying-, agricultural-, and deforestation activities damaging the Earth's protective layers. Thereupon moisture cannot be retained in the soil. Furthermore, the petrochemical industry's practice of depriving the planet of its oil, makes the Earth crust rigid, which enhances the effect of ever hotter summers and increasingly colder winters. As long as civilization stubbornly refuses to initiate effective countermeasures, the trend WILL REMAIN worsening.

These aspects alone should suffice to preemptively preclude the IMMP from commencing.

CONCLUSION

The Pursuit of Fictitious Values:

It is a caustic fact that precisely the human quality of possessing advanced intellect, which is proclaimed to raise them above all other animals on the planet, also generates their propensity to succumb to the lure of fictitious values. They then pursue these values with such vigor and commitment that they mindlessly compromise their very own and only planet and habitat. Such behavior, by any measure, constitutes a substantial psychiatric condition.

Formal Complaint and Recommendations:

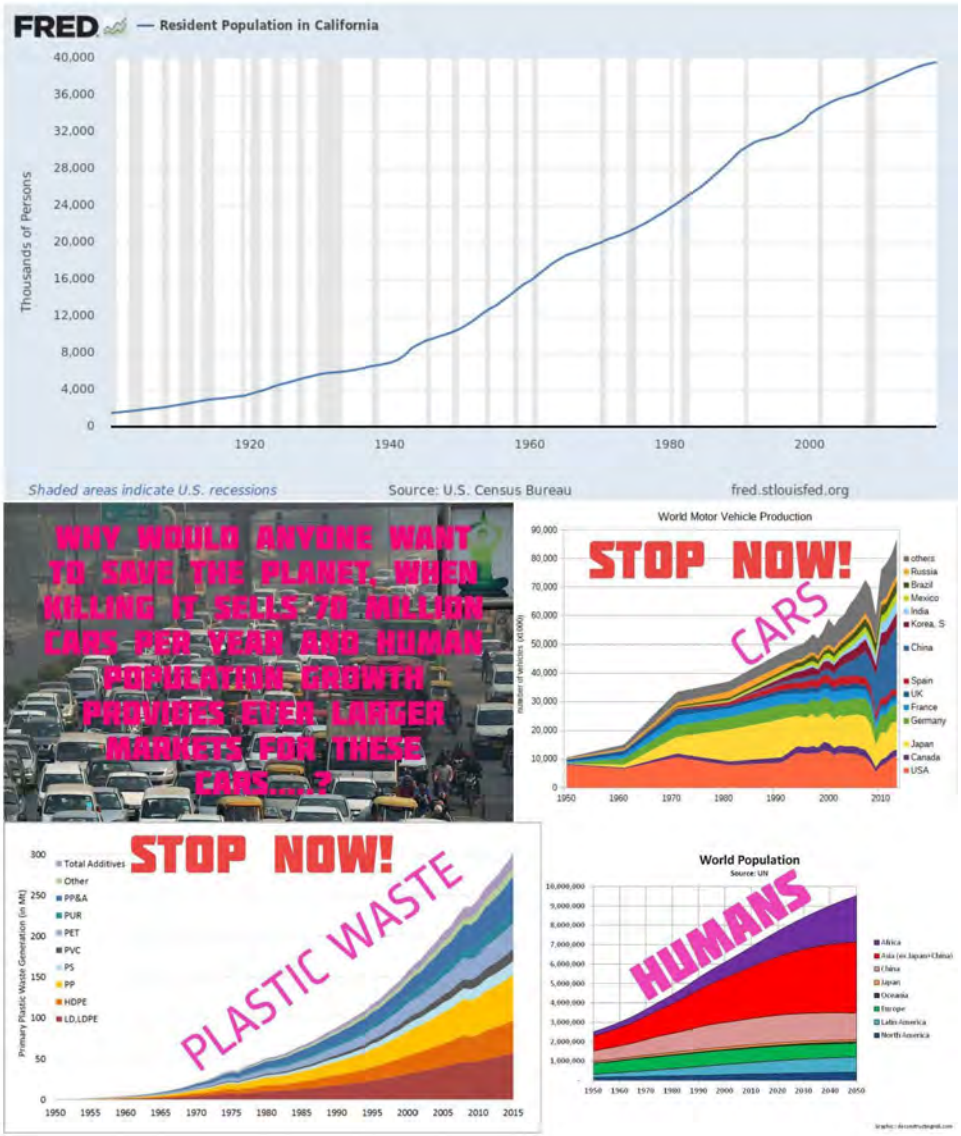
The fundamental problem here lies with the fact that in midst numerous conditions of critical state, there still exist entities who have nothing on their mind than serving their own playfulness. They conveniently hide behind the "limited liability" curtain of corporations and the dubious achievement that these corporations possess full rights as persons before the law. Although these "persons" can be sued and prosecuted, it is obviously impossible to incarcerate a corporation; financial fines costing them a mere giggle. What can be done however, is to subject them to a psychological evaluation.

Psychology possess the ability analyze an entity's character without needing access to the physical person. Anything from documents and letter composed, over actions taken and behaviors displayed, to buildings, gear, and artwork constructed, can be utilized to establish somebody's personality, so why not a corporation's? Subsequent diagnoses can range from minor psychological disorders to criminal insanity. Thereupon a court may easily impose restrictions to the entity's ability to conduct business, engage in politics, and otherwise interact with society and the environment.

What is left to mention, is the county personnel's acute inability to professionally analyze a proposal's viability, and their thorough incompetence to mindfully consider the condition and state of affairs of the land entrusted to their care. Instead they display a strong propensity to collaborate with ill-minded, potentially criminal elements.

Today, we live in a world that steadily inches towards the abyss. We can either let humans have it their way for as long as they can make the planet last, or we can stop them from having it their way, and make the planet last!

Sincerely, J.T. Mayr, Friday, Grass Valley, CA, January 14, 2022


FRED — Resident Population in California
Thousands of Persons
40,000
36,000
32,000
28,000
24,000
20,000
16,000
12,000
8,000
4,000
0
1920
1940
1960
1980
2000
Shaded areas indicate U.S. recessions
Source: U.S. Census Bureau
fred.stlouisfed.org
WHY WOULD ANYONE WANT TO SAVE THE PLANET, WHEN KILLING IT SELLS 70 MILLION CARS PER YEAR AND HUMAN POPULATION GROWTH PROVIDES EVER LARGER MARKETS FOR THESE CARS....?
World Motor Vehicle Production
STOP NOW!
CARS
others
Russia
Brazil
Mexico
India
Korea, S
China
Spain
UK
France
Germany
Japan
Canada
USA
1950
1960
1970
1980
1990
2000
2010
STOP NOW!
PLASTIC WASTE
Primary Plastic Waste Generation (in Mt)
Total Additives
Other
PP&A
PUR
PET
PVC
PS
PP
HDPE
LD,LDPE
World Population
HUMANS

INDIVIDUAL LETTER 296: J.T. MAYR

Response to Comment Ind 296-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 296-2

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 296-3

The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Responses and 3.

Response to Comment Ind 296-4

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 297

From: sepmayr@yahoo.com
Sent: Friday, February 18, 2022 1:25 PM
To: wroller@theunion.com; karla.marshall@bsee.gov; Idaho MMEIR; Josef Mayr Mayr
Subject: The Union, February 18, 2022, "Community Conversation,"

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TO: William Roller, wroller@theunion.com

US Department of Interior, **Bureau of Safety and Environmental Enforcement**

Nevada County, CA Idaho.MMEIR@co.nevada.ca.us

RE: The Union, February 18, 2022, "Community Conversation,"

Ind 297-1

In addition to my previous arguments, and in response to THE UNION's article, I hereby point out that "economic" growth" might well have been the "call of the day" some decades, or even centuries ago; Today, however, we face severe problems of ecological and sociological nature, resulting from over-population and restless industrial expansion. If humans are to prevail as a species on this planet, we must revert to a respectful treatment of all our Mother Earth. This does not mean that we ought to climb back up the trees and throw bananas at each other, no, it merely entails that now is the time to relax a few notches and enjoy the fruits of our past achievements. This includes measures towards population reduction, ceasing of harmful, industrial activities, streamlining of production methods and product lines of essential items, and, foremost of all, focusing on SUSTAINABILITY AND SOCIOLOGICAL SOPHISTICATION.

Just because some project proves to be "reasonable and achievable," and that it claims to have invested millions of dollars into its environmental review, does not supply it with MERIT. And creating jobs that produce something unimportant as gold, propels us straight back to old Egypt and its pyramid builders: There is no more need for such "economic slavery." The need and beneficence of our current profit-based economy model is also outdated. As it is based on the illusion of infinite growth in a finite space, it inevitably was bound to reach its limits.

That humans need to work in order to obtain money to purchase their food is also a mere hallucination. Food comes from Nature, not from the supermarket or candy factory. And if one possesses the capacity of rational thought, he/she will realize that it is each creature's inalienable prerogative to seek food and pursue maturation. Humans have violated this universal law by enslaving animals and each other to lift a small, self-proclaimed elite. They

1

thereby arranged for a situation in which wild (or free) animals comprise merely 4% of all living creatures on the planet; a whopping 60% are occupied by life stock, and the rest? Humans!

To counteract these shocking facts dictates the mission of the day: Reduce and re-naturalize.

Sincerely, J. T. Mayr, Friday, February 18, 2022

Please find below my original contribution, submitted to Nevada County earlier this month.

TO: US Department of Interior, **Bureau of Safety and Environmental Enforcement**

Nevada County, CA Idaho.MMEIR@co.nevada.ca.us

RE: A proposed project in Nevada County, CA, to re-open a mining operation, named the "Idaho-Maryland Mine Project. (IMMP)"

OBJECTIVE: Submitting a comment to Nevada Coty and reporting an instance of intended, inappropriate land-use to state- and federal authorities.

PROJECT SUMMARY

Ind 297-2

The project involves the re-opening of a mining operation in Nevada County, CA, near Grass Valley, CA. It promises moderate impact on the environment and substantial benefit to the local economy. However, massive quantities of surface water are to be utilized, there will be substantial pollution from dust and smog, and great amounts of mining gravel must be disposed of.

DISCUSSION

From the Environmental Impact Report Draft:

Ind 297-3

"Six impacts in this category are listed as either "less than significant," or "less than cumulatively considerable" prior to mitigation, with no mitigation measures required, while another — the generation of greenhouse gas emissions that may have a significant impact on the environment — is listed as "cumulatively considerable" prior to

2

listed mitigation measures and "less than cumulatively considerable" afterward." https://www.theunion.com/news/report-delves-into-idaho-maryland-mine-project/

In a time in which natural resources are swiftly depleting due to human activity, in which yard-thick trees are snapping like tooth picks in the wind due to air quality issues, dry climate, and subsequent parasite infestation, an "Environmental Impact Study" ought to entail somewhat more than a utility to push for the venture's ultimate approval. Arguments like "economic growth" belong to an era which has ended some time ago. If one raises his head and looks beyond the luring local kudos such a project might bring to the area, and considers the global ramifications of what is being planned, he/she is bound to realize that there exists no need for any more economic growth, for further population influx, and foremost of all, no need for MORE GOLD!

About Gold:

The United States possesses some 8,000 metric tons of raw gold, which lays uselessly in its bunkers. Gold Reserves - Countries - List.The proprietors of the IMMP might sooth their desires by utilizing their funds to purchase some of it.



Via its replacement with inferior metals, later with celluloses, and finally with nothing more than electronic data, gold's function of serving as primary currency has long ended and it further on provides no essential value to humans.

Project Evaluation:

Proper project evaluation starts with determining the proposal's feasibility and merit. Although the IMMP might well be practicable (it primarily takes logistical efforts; no extraordinary managerial skill or leadership are required to re-initiate a previously abandoned endeavor), it features absolutely no merit. The pursuit of a fictitious value bares no necessity the local community or the environment.

Ind 297-4

A business project preposition ought to come about upon verifiable, local need for the venture's intended product. Proposing to restart a venture within an industry segment whose prior stint's rubbish is still corrodingly littering Grass Valley's surrounding forests, is simply childish – Cleaning up one game prior to beginning another, is taught in preschool.

Indirect Merits / Pre-existing Environmental Conditions:

Ind 297-5

The aspect of providing employment to local resident, swiftly loses momentum when one considers that the global human population is growing at a rate of 100 Million per annum, along with it all the waste and pollution that humans produce. A sincere political

leader's prospective should thereupon shift from providing for a growing population, to CONTROLLING ITS HEAD COUNT!

It is no longer an idealistic "tree-hugger" standpoint to earnestly consider one's very own actions in respect to environmental impacts. Since the past several decades, human activity has pushed the global biosphere's integrity to the brink of collapse. Thereupon it becomes obvious that the planet does not need any more symbolism, technology, industry, or humans! And ironically, not even human civilization can utilize any more of these "commodities." What civilization needs to recover from this self-created misery, is *sophistication* instead of quantitative growth. Granted, mankind has come forth with some brilliant scientists, engineers, and architects; Nevertheless, if they keep using their talents against Nature, their cumulative IQ remains somewhere below that of a maggot or a blob of chicken snot.

Due to extensive drought conditions, the local flora is severely dry, surface water scarce, and the summers are getting hotter each year. This is due to air and water pollution generating a greenhouse effect, and mining-, quarrying-, agricultural-, and deforestation activities damaging the Earth's protective layers. Thereupon moisture cannot be retained in the soil. Furthermore, the petrochemical industry's practice of depriving the planet of its oil, makes the Earth crust rigid, which enhances the effect of ever hotter summers and increasingly colder winters. As long as civilization stubbornly refuses to initiate effective countermeasures, the trend WILL REMAIN worsening.

These aspects alone should suffice to preemptively preclude the IMMP from commencing.

The Pursuit of Fictitious Values:

It is a caustic fact that precisely the human quality of possessing advanced intellect, which is proclaimed to raise them above all other animals on the planet, also generates their propensity to succumb to the lure of fictitious values. They then pursue these values with such vigor and commitment that they mindlessly compromise their very own and only planet and habitat. Such behavior, by any measure, constitutes a substantial psychiatric condition.

CONCLUSION

Formal Complaint and Recommendations:

The fundamental problem here lies with the fact that in midst numerous conditions of critical state, there still exist entities who have nothing on their mind than serving their own playfulness. They conveniently hide behind the "limited liability" curtain of corporations and the dubious achievement that these corporations possess full rights as persons before the law. Although these "persons" can be sued and prosecuted, it is obviously impossible to incarcerate a corporation; financial fines costing them a mere giggle. What can be done however, is to subject them to a psychological evaluation.

4

Psychology possess the ability analyze an entity's character without needing access to the physical person. Anything from documents and letter composed, over actions taken and behaviors displayed, to buildings, gear, and artwork constructed, can be utilized to establish somebody's personality, so why not a corporation's? Subsequent diagnoses can range from minor psychological disorders to criminal insanity. Thereupon a court may easily impose restrictions to the entity's ability to conduct business, engage in politics, and otherwise interact with society and the environment.

What is left to mention, is the county personnel's acute inability to professionally analyze a proposal's viability, and their thorough incompetence to mindfully consider the condition and state of affairs of the land entrusted to their care. Instead they display a strong propensity to collaborate with ill-minded, potentially criminal elements.

Today, we live in a world that steadily inches towards the abyss. We can either let humans have it their way for as long as they can make the planet last, or we can stop them from having it their way, and make the planet last!

Sincerely, J.T. Mayr, Friday, Grass Valley, CA, January 14, 2022

5

INDIVIDUAL LETTER 297: J.T. MAYR

Response to Comment Ind 297-1
The comment does not specifically address the adequacy of the DEIR. Nonetheless, the commenter's concerns have been noted for the record and forwarded to the decision makers for their consideration.

Response to Comment Ind 297-2
Please see Response to Comment Ind 296-1.

Response to Comment Ind 297-3
Please see Response to Comment Ind 296-2.

Response to Comment Ind 297-4
Please see Response to Comment Ind 296-3.

Response to Comment Ind 297-5
Please see Response to Comment Ind 296-4.

Individual Letter 298

Dist 4

I support re-opening the Idaho-Maryland Mine

Nevada Coun[illegible] tremendous need of new, well-paying jobs that can help [illegible]vide a [illegible]mic future for today and for decades to come. Rise Grass Va[illegible]ey's p[illegible]uild a modern and enviro[illegible]tally [illegible]nsitive mine that respects ne[illegible]bors [illegible] our na[illegible]al en[illegible]ronment wh[illegible]a[illegible]er 600 new local jobs is a [illegible]ce-in-a-gener[illegible]n opp[illegible]unity [illegible] revitali[illegible] our local economy.

Re-op[illegible]ing [illegible] m[illegible] means ov[illegible]0 new employees in safe and satisfying careers with[illegible] av[illegible] expected an[illegible]rnings of more than $122,000 including benefits. The [illegible]ne [illegible] also s[illegible]rm[illegible]ional 300 jobs through related new business in the area. This [illegible]ject w[illegible]e[illegible]nce the pride an[illegible] confidence of Nevada County workers and their [illegible]ies [illegible] build stable an[illegible]pro[illegible]perous lives.

Opportunities like this come [illegible]ly. Rise Grass Valley has a responsible, innovative project for Ne[illegible]a Co[illegible]y. I [illegible] the Board of Supervisors and other county officials to jump start our l[illegible]al econo[illegible]y by strongly su[illegible] re-opening of the Idaho-Maryland Mine.

I do not support the mine
J. McRae

MCRAE
14436 Sugar Loaf Road
Grass Valley, Ca. 95949

ZIP

Email Address

Board of Supervisors,

Please vote no on Re-opening the mine!

Respectfully,
Jackie McRae

RECEIVED
FEB 24 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ind 298-1

INDIVIDUAL LETTER 298: JACKIE MCRAE

Response to Comment Ind 298-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 299

From: Jacqi Britton <jacqi.todd@gmail.com>
Sent: Monday, April 4, 2022 11:51 AM
To: Idaho MMEIR
Subject: NO to the MINE ! ATTN: Matt Kelley! Leave our Nature alone!

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

To whom it may concern,

WE DON'T WANT NO MINE ADDITION! We don't need no gold control! Hey ATTN: Matt Kelley! Leave our Nature alone!

Ind 299-1 I am a current resident and registered voter in Nevada County and I am in **OPPOSITION to THE MINE!**

If you have any questions, please feel free to write me back.

Thank you,
Jacqi Britton

1

INDIVIDUAL LETTER 299: JACQI BRITTON

Response to Comment Ind 299-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 300

From: Jacqueline Finley
To: BOS Public Comment
Subject: Rise Gold Mine
Date: Tuesday, March 22, 2022 8:28:56 PM
Attachments: 2022RiseGold.docx

Dist 2

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Attached are my feelings about the Rise Gold Corporation's mine proposal.

Jacqueline Finley
10901 Thornicroft Way
GV 95949

530-274-8574

Ind 300-1

My Cornish great-great-grandfather arrived about 1850 in Grass Valley. After several years he built and worked a nineteen-acre gold mine several miles outside of town. This mine is still owned by his descendants, not by choice, but by the fact the land is so polluted with mercury and arsenic that it cannot be sold. It stands as a sad commentary on what happened in the past.

I excuse him and his contemporaries for not fully understanding the incredible damage gold mining does to a region. At the time the early mines were functioning, citizens were less concerned about long-term environmental effects, and more on providing financial security for themselves and their families.

Over the decades, however, we've learned how mining destroys the earth, not just here, but worldwide. Mining is a complicated and often unpredictable endeavor, even in 2022. To be productive it must be noisy and encompassing. While Rise Gold Corporation claims the environment won't be harmed, nor residents impacted by lines of loud trucks or water supply worries, history points otherwise.

Gold is not a life necessity, but a healthy, natural world and happy community should be. The people of this beautiful area have spoken. We do not want the Rise Gold Mine.

INDIVIDUAL LETTER 300: JACQUELINE FINLEY

Response to Comment Ind 300-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 301

Jake Jacus
District 1
Grass Valley

Nevada County Planning Department

To Whom It May Concern,

Ind 301-1 I have several points of view regarding the mining situation. Number one, is the amount of noise and traffic on the roads that will be generated from the mine, it is completely unacceptable. Number two, is taking that much water from underground, and to do so during a drought and dredging up all the toxins that will come with it, is completely wrong. This will not only affect the environment; the streams, rivers, agriculture, air quality, and wildlife, but it will also directly affect citizens of Nevada County's personal underground wells. In my opinion, it will irrevocably change our way of life and change the serenity of this beautiful area we call home. As far as this company, Rise Gold, their past history alone should be enough to deem them unworthy to even work on this ill fated project. It should not be about one company's greed, it should be about preserving the quality of life that we have all come to love. I personally think their promise of boosting our economy is a sham, it will not bring jobs to our county, but will likely outsource jobs from elsewhere. The end effect being, lining the pockets within the company while negatively affecting our community. And who is to say that they will not just shut down the mine leaving behind a huge toxic dump with no plan to clean it up. I want to see my children and grandchildren to be able to grow up in a beautiful community and area that has so much to offer, without reopening a mine that has the potential to destroy everything we love about this area.

Sincerely,
Local Citizen and Business Owner Since 1979

INDIVIDUAL LETTER 301: JAKE JACUS

Response to Comment Ind 301-1

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 302

W

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Jalana Smith

Address: 18690 Jones Ridge road, Grass Valley, CA 95945

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

I am a lifelong resident of Nevada County for 40 years. I have seen how mining in the past has negatively impacted the land, environment and community locally. This new mine will cause serious damage to our local environment and also the quality of life of the residents of Nevada County.

Ind 302-1

The damage from this mine WILL impact our community very negatively. This community has made it very clear that we do NOT want this mine. I see many negative effects, and no benefit to our community that would offset the negative outcome.

Please DO NOT allow this mine to come into our community.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 302: JALANA SMITH

Response to Comment Ind 302-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 303

From: James Blimthorpe
To: Idaho MMEIR
Subject: Community Opinion
Date: Wednesday, January 5, 2022 12:15:12 PM

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Ind 303-1

Obviously, the supervisors are trying to push through something that the people of Nevada County do NOT WANT.

The environmental report is probably tilted toward opening the mine and belittling all of the justifiable reasons against the mine.
Our community is solidly against this monstrosity of a mine. The supervisors should surely recognize the opinions of the residents here in Nevada County, rather than those of a corrupt corporation.

James Blimthorpe

INDIVIDUAL LETTER 303: JAMES BLIMTHORPE

Response to Comment Ind 303-1

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 304

From: James Blimthorpe <blimthorpe@gmail.com>
Sent: Tuesday, January 4, 2022 8:58 AM
To: Idaho MMEIR
Subject: No on mine

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Ind 304-1 The majority of people in this county are totally against this mining monstrosity. No matter what the fake EIR says, there is going to be corruption involved in the decision to go ahead with this project. Why is it not decided by the people of Nevada County ?

James Blimthorpe

1

INDIVIDUAL LETTER 304: JAMES BLIMTHORPE

Response to Comment Ind 304-1

The commenter notes the EIR is fake, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 305

From: James Haufler
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project EIR
Date: Saturday, January 8, 2022 2:29:45 PM

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Greetings:

I have a few questions:

Ind 305-1

1. Have any of the soil samples or rock samples, or cores been tested for radioactive elements such as uranium? If so, what were the results? If no such testing was done, why not?

Ind 305-2

2. Will Rise Grass Valley purchase a bond that will pay for reclamation/restoration of the sites affected by this project if Rise Grass Valley or their successors, or assigns permanently cease operations at the site for any reason including bankruptcy?

Ind 305-3

3. Is there any information that would support the idea that there will actually be a local or regional market for the sale of surplus engineered fill as construction aggregate or fill? If there is not such a market, how will Rise Grass Valley dispose of that material at their expense, and without any impact on Nevada County for waste management operations or expenses.

Thank you,

Jim

James Haufler
3555 Arden Villa Court
Roseville, CA 95747
916-865-4721 (home)
916-801-3669 (cell)

INDIVIDUAL LETTER 305: JAMES HAUFLER

Response to Comment Ind 305-1

The commenter asks if the Project Applicant tested any of the rock/core samples for radioactive elements. Water sampling conducted for the project included radiological testing, including uranium, as shown in Table 3-6 of Appendix K.2 and all results are well below regulatory standards, as shown in the table. Uranium was not analyzed in rock samples because elevated uranium is not present in the rock types in the mine area. The commenter is referred to Response to Comment Grp 8-15.

Response to Comment Ind 305-2

The commenter asks if the Project Applicant will purchase a bond for reclamation of the project site. A reclamation bond is required for the project. The commenter is referred to page 4.6-24 of the DEIR and Appendix C of the DEIR.

Response to Comment Ind 305-3

The commenter asks if there is any information supporting the notion that engineered fill could be used for local or regional construction projects. The commenter is referred to Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Individual Letter 306

From: James McMaster <jdmcmaster@hotmail.com>
Sent: Monday, April 4, 2022 3:37 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Rise Mine DEIR Comments

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I moved to the Union Hill area of grass Valley in June 2020 from the east bay of San Francisco looking for a better quality of life that includes: clean air, clean water, quiet surroundings, and lack of traffic congestion. The proposed Rise Mine violates all of those.
I am renting a house and would have purchased one in my neighborhood, which I love, except for the threat of the coming mine. Specific DEIR concerns are:
– The groundwater model has fundamental flaws in the initial start point and baseline data Sumption stash all of which throw off the entire analysis.

Ind 306-1

Ind 306-2 – Dealing with mine waste – about asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

Ind 306-3 – Greenhouse gas emissions – the report excluded elements that would put the project over the arbitrary threshold limit, but recent climate change Cole say the threshold should be "net zero".

Ind 306-4 – Cleanup of the toxic, pre-super fund Centennial site that would be used to dump mine waist is not included in the DEIR but is required by the California environmental quality act.

Ind 306-5 – Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 306-6 – The DEI are incorrectly assesses nighttime noise and underestimates the noise of dumping main waste near established residential neighborhoods.

Ind 306-7 – Air traffic hazards anesthetic impacts need to be studied further due to the likelihood of a moisture cloud plume that could be created by warm saturated air ventilation.

Ind 306-8 – Blasting plans don't follow US mining guidelines that restrict blasting during evening hours.

Ind 306-9 – The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant. In this time of scarce water in climate change do we really want to be dumping millions of gallons of water into the creek? I think not.

Ind 306-10 – Meteorological data used to assess the health risk of airborne pollutants doesn't fit grass Valley's profile or accurately reflect local conditions.

Ind 306-11 Please consider my concerns above and I am happy to talk with you in person. Please rule that the DEIR is inadequate in the mine should be stopped.

A couple of years ago I took a vacation through Butte Montana. At its peak there were over 3500 people working in the mine, today there are seven people. Those of the guys who operate the robots. As you look around there's no trees because acid rain has killed them off from the 1800s to today. Don't let grass Valley become a wasteland like Butte.

Sincerely,

James McMaster
10845 Bartlett Dr.
grass Valley CA 95945
925.286.4958

INDIVIDUAL LETTER 306: JAMES MCMASTER

Response to Comment Ind 306-1
The commenter states that the groundwater model is flawed due to the initial start point and baseline data but provides no further information. The DEIR analyzed the project's impacts to groundwater in Chapter 4.8 (Hydrology and Water Quality) and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 306-2
The commenter states that the DEIR understates the degree to which asbestos emissions from the project will need to be managed but does not identify any inadequacies of the DEIR with regard to asbestos. The DEIR analyzed asbestos emissions in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and found the impacts to be less than significant after mitigation. The commenter is also referred to Master Response 18 – Air Quality Thresholds, Master Response 22 – Conservatism of Asbestos Assumptions, Master Response 23 – Adequacy of Asbestos Sampling, Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 306-3
The commenter states that the DEIR excluded elements which puts the project's GHG emissions over an arbitrary threshold, but recent climate change goals purportedly require net zero GHG emissions. The commenter is referred to Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 306-4
The commenter states the DEIR improperly excludes the cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 306-5
The commenter states that missing construction schedules skew the DEIR's analysis of the project's impacts. The commenter is referred to Master Response 24 – Project Construction Schedule.

Response to Comment Ind 306-6
The commentor states that the DEIR incorrectly assesses nighttime noise and underestimates the noise impacts of dumping waste near residential neighborhoods but provides no further details or explains how the DEIR is inadequate. The DEIR analyzed noise impacts in Chapter 4.10 (Noise and Vibration) and found the noise impacts associated with engineered fill placement to be less than significant after mitigation (see Impact 4.10-2). Regarding nighttime noise, please see Response to Comment Grp 21-130.

Response to Comment Ind 306-7
The commenter states that the DEIR must discuss air traffic hazards due to a potential moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

Response to Comment Ind 306-8
The commenter states the project does not adhere to federal mining guidelines regarding blasting. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 306-9

The commenter states that the DEIR fails to demonstrate impacts to wildlife would be less than significant and is concerned about discharging water to South Fork Wolf Creek during a drought. The commenter does not provide any additional information to identify how the DEIR is inadequate with regard to wildlife impacts. The DEIR analyzed biological impacts in Chapter 4.4 (Biological Resources) and found the impacts to be less than significant after mitigation. The DEIR also analyzed the impacts to South Fork Wolf Creek in Chapter 4.8 (Hydrology and Water Quality) and found the impacts less than significant after mitigation. The commenter is also referred to Master Response 30 – Biological Study Technical Adequacy, Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 306-10

The commenter states that the DEIR utilizes meteorological data in the health risk assessment that does not reflect local conditions. The commenter is referred to Master Response 17 – Meteorological Data Used in HRA.

Response to Comment Ind 306-11

The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 307

From: James Mullen
To: Idaho MMEIR
Subject: Reopen Idaho Maryland mine?
Date: Sunday, January 9, 2022 5:43:03 PM

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Ind 307-1

No way, no how

Sincerely, James p Mullen
13420 Colfax Hwy grass valley ca 95945
Sent from my iPad

INDIVIDUAL LETTER 307: JAMES MULLEN

Response to Comment Ind 307-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 308

From: Jamie Legon <jamielegon@gmail.com>
Sent: Saturday, April 2, 2022 10:04 AM
To: Idaho MMEIR
Subject: The Mine

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Ind 308-1

Opening the mine is the worst possible idea. The amount of water needed and expended is ENORMOUS. Doesn't anyone realize that we're in a DROUGHT!!! The amount of jobs created is pitifully small next to the amount of people/families impacted by the lower water table. The supposed "facts" the mine uses for justification are ludicrous, falsely stated and improperly studied. This idiot proposal shouldn't even be on the table...

INDIVIDUAL LETTER 308: JAMIE LEGON

Response to Comment Ind 308-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 309

From: David Lore <dlore@santacruzcoe.org>
Sent: Monday, April 4, 2022 12:57 PM
To: Idaho MMEIR
Subject: Reopening the mine

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Dear Mr Kelly,

Of my many concerns about the reopening of the gold mine at the Brunswick site, the top one is the amount of water required to run the mine and the discharge of waste water into our streams and soils. California is in the worst drought ever experienced, according to an 800 year study headed up by UCLA climate scientist Park Williams. Even without this disturbing new evidence, the fact that California is in a very serious drought is indisputable. Our Board of Supervisors must put our citizen's and environmental water needs first. Whatever amount of money the county may make cannot create more water.

Ind 309-1

I'm concerned how this proposal impacts wells in the area. The FEIR needs to analyze all the wells potentially impacted by the project. The impact analysis on wells in the DEIR is inadequate.

Please consider all the many serious impacts of re-opening the mine sent your way. This is a very serious decision that will affect our county for generations. Thank you.

Sincerely,

Jan K Todd
14494 Lower Colfax Rd.
Grass Valley, CA 95945

Santa Cruz County Office of Education
www.santacruzcoe.org

1

INDIVIDUAL LETTER 309: JAN TODD

Response to Comment Ind 309-1

Please see Master Responses 13 through 16 regarding groundwater, including drought and climate change. See also Master Response 35 - Discharge to South Fork Wolf Creek. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 310



DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR)

April 4, 2022 (*Emailed,* 4 pages)

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us

Original Sent by Email on April 4, 2022 See Page 6

GENERAL COMMENTS on the Proposal & DEIR:

Ind 310-1 Having reviewed many Environmental Impact Reports as a Municipal Advisory Council (MAC) Member in a large California unincorporated area, I am very concerned about the proposed project and the general inadequacy of the draft Environmental Report that has been prepared. A DEIR with these problems likely will end up in litigation...

Ind 310-2
- **INADEQUATE ASSESSMENT of CUMULATIVE EFFECTS** on Water Quality and Water Use, Ground Water Availability and Quality, Air Quality, Traffic, Noise, Quality of Life...

Ind 310-3
- **INADEQUATE ASSESSMENT of MITIGATION RISKS...** What happens when the proposed project proponents FAIL to complete promised MITIGATIONS? What are the RISKS to the COMMUNITY?

Ind 310-4
- **INADEQUATE ASSESSMENT of RISKS & CUMULATIVE EFFECTS – FOREVER. The 80-year time span of the proposed project, and the need to mitigate toxics affecting water, air, and quality of life issues will last forever... WILL the PROPOSED MITIGATIONS? Or, will they end with an early closing or failure of the proposed project? Then, who pays?**

Ind 310-5
- **CONCLUSION: This DEIR MUST BE REJECTED, UPDATED AND REVISED AND ADEQUATELY COMPLETED AND RECIRCULATED to the PUBLIC.**

1

DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).

MITIGATIONS:

Ind 310-6

- The proposed project will take away the long-term groundwater / property rights and economic value of the hundreds of properties in the area of the proposed mine as a result of "dewatering."

Ind 310-7

- Proposed project Mitigations may become too expensive or fail, or both, leaving significant adverse consequences that are not mitigated. How does the DEIR assess the RISKS associated with potential mitigations?

Ind 310-8

- CUMULATIVE IMPACTS do NOT MATCH the proposed MITIGATIONS...

For EXAMPLE, concerning WATER:

Comments from NID Nevada Irrigation District General Manager Jennifer Hanson illustrates my concerns on the inadequacy of the DEIR with respect to a critical issue like WATER and WATER QUALITY, RISKS to the COMMUNITY from Rise Gold's proposal. Should Rise Gold fail and fall into bankruptcy, for business reasons or because of the cost of cleaning up environmental damage, the public, public agencies, likely will be faced with the ultimate clean up efforts and costs. How are these risks to Nevada County taxpayers mitigated?

Ind 310-9

"Hanson said Rise Gold Corp., the entity trying to reopen the mine, should purchase a bond worth around $14 million to account for the assumptions and unknowns of hydrological modeling and the risk incurred to their neighbor's water supply."

"Hanson said the district serves over 700 irrigation customers, on top of purveying potable water to most of Nevada County, and requested that a water quality mitigation measure be included in the next EIR that would require daily monitoring and public availability to data regarding discharged water."

For ADVERSE WATER IMPACTS alone, my professional position would be to recommend REJECTING the PROPOSED DRAFT EIR as well as the PROPOSED PROJECT!

DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).

FOR EXAMPLE: Massive WATER FLOWS & TOXICS drain into WOLF CREEK, the Bear & Feather Rivers, & eventually San Francisco Bay:

Ind 310-10

Dewatering the proposed mine and daily pumping from the proposed mine would place millions of gallons of water into Wolf Creek. The water would include toxics. HOW MUCH of WHAT TYPES? While the DEIR proposes "cleaning" the water, before putting back into Wolf Creek (water that may be used for drinking water, for irrigation, for environmental needs on its way to San Francisco Bay...)

Ind 310-11

How will the proposed project pay for and guarantee that the mine "waste water" will not damage the downstream Wolf Creek? How will the firm pay for equipment failures or plant failures that place toxics into Wolf Creek? What is the firm's proposed liability and what insurance are they providing Nevada County?

Ind 310-12

Again, the history of other "re-opened" mines in the area is not a stellar one.

- **The LAST PROPOSAL for REOPENING this MINE FAILED for the same reasons this proposal should not be approved after an ADEQUATE EIR is prepared, commented on by the public, and analyzed by the Nevada County Planning Commission and the Board of Supervisors:** Idaho-Maryland Mine in the 2005-2012 timeframe: This proposed project **failed to complete the Environmental Impact Report due to environmental concerns and financial problems.** (Source: CEA) **The DEIR SHOULD EXPLAIN HOW & WHY THIS PROPOSAL & MITIGATIONS HAVE CHANGED FROM THE LAST FAILED ATTEMPT TO REOPEN THE MINE?**

Ind 310-13

- The **San Juan Mine (Siskon) opened and was forced to shut down in 1995** after a disastrous draining of local wells due to mining. The impacts of this failure are still felt amongst the residents. Wells were permanently damaged. (Source: CEA) This is a major problem for this DEIR.

Ind 310-14

Again, SIGNIFICANTLY ADVERSE WATER & TOXIC ISSUES are an IMPORTANT REASON for OPPOSING/REJECTING the proposed project.

3

DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).

TOXICS EXAMPLE : The CENTENNIAL SITE is TOXIC! LARGE VOLUMES OF TOXICS would be "located" on both the proposed Centennial site near Downtown Grass Valley and the proposed Brunswick site...

Ind 310-15 "The Centennial property covers 56 acres and is located at 10344 Centennial Drive in Grass Valley, along Idaho Maryland Road. It is currently County land, but the ***City of Grass Valley has included it in their near-term annexation plans.*** Up until its closure in 1956, the site was the primary processing and access site for the Idaho Maryland Mine. **The site now contains over 270,000 cubic yards of legacy tailings material. Soil samples show contamination from arsenic, cobalt, barium, mercury, thallium, chromium, copper, lead, zinc, cyanide, vanadium and nickel.** These tailings cannot be used for the base layer of the proposed mine waste pile and must be removed." (Source: CEA)

Ind 310-16 "An agreement between Rise Gold and the **California Department of Toxic Substances (DTSC) mandates that the contaminated tailings be cleaned up**, and a work plan is being prepared. This cleanup project permit is a separate project from the mine permit. The mine proposal includes dumping more mine waste on this site." (Source: CEA) Where is the completed work plan & is it in the DEIR?

Ind 310-17
- **Nevada County already has a legacy of toxic sites left over from the gold mining industry.** Some of those sites remain highly toxic to this day. ***Does Nevada County need or want to increase the size and/or number, or both, of TOXIC WASTE SITES, including one very near to central Grass Valley?***

Ind 310-18
- Other waste has accumulated from former gold country operations in the bottom of San Francisco Bay. **Will the mining industry – the proposed Rise Gold mine -- clean up their new toxics as well as the existing toxics on the property they purchased in 2017, knowing the toxics had been there for decades.** Will Rise Gold's proposed project help to pay to clean up the existing toxics accumulated on their property, and washed downstream from Wolf Creek to the San Francisco Bay?

Ind 310-19 **CONSIDERING the RISKS that MITIGATIONS are NOT COMPLETED and are INADEQUATE, I consider there are sound environmental and economic reasons to reject the DEIR and the proposed mine reopening project on this site, very near downtown Grass Valley, and several important Grass Valley business districts.**

4

DRAFT EIR COMMENTS - Proposed Idaho-Maryland Mine (DEIR).

CONCLUSION: Again, having reviewed many DEIRs as a Municipal Advisory Council member, I consider this DEIR to be INADEQUATE in its assessment of CUMULATIVE IMPACTS, SIGNIFICANTLY ADVERSE IMPACTS, and PROPOSED MITIGATIONS and RISK ASSESSMENTS, and the PROPOSED PROJECT should be REJECTED by the Nevada County Planning Commission and Board of Supervisors, along with Nevada County residents!

Ind 310-20

Thank you for the opportunity to comment on this important document.

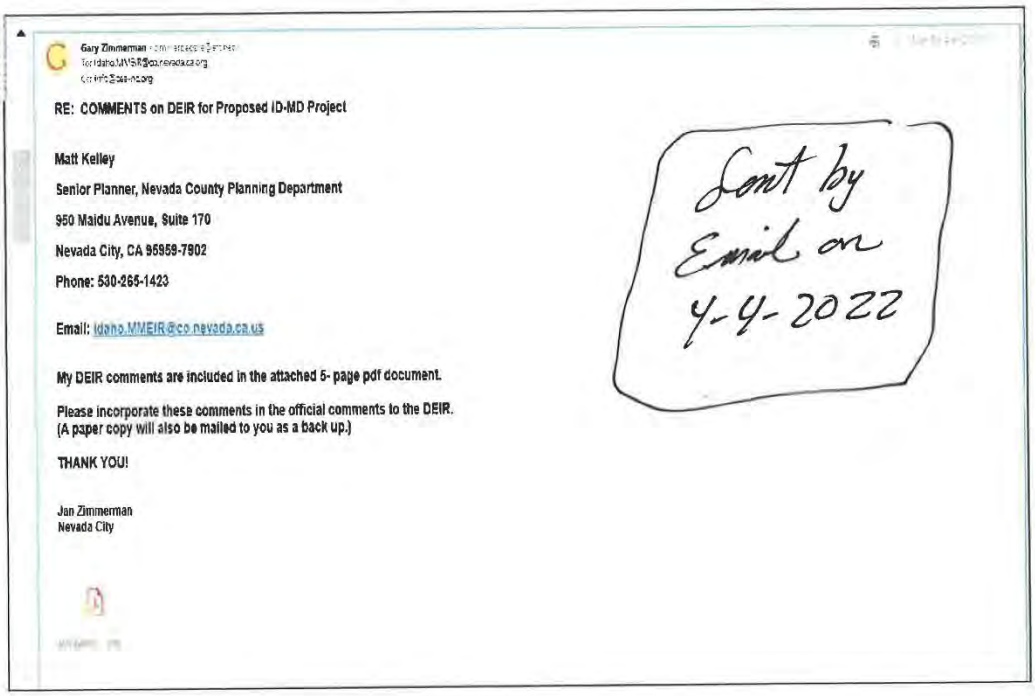
Jan Zimmerman
11453 Snowline Road
Nevada City, CA 94595

Submitted by Email on April 4, 2022 (and cc by USPS Mail) to:

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423

Email: Idaho.MMEIR@co.nevada.ca.us

Ind 310-21



Gary Zimmerman
To: Idaho.MMEIR@co.nevada.ca.us
cc: info@[illegible]

RE: COMMENTS on DEIR for Proposed ID-MD Project

Sent by Email on 4-4-2022

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423

Email: Idaho.MMEIR@co.nevada.ca.us

My DEIR comments are included in the attached 5- page pdf document.

Please incorporate these comments in the official comments to the DEIR. (A paper copy will also be mailed to you as a back up.)

THANK YOU!

Jan Zimmerman
Nevada City

Matt Kelley, Senior Planner
Nevada County Planning Dept
950 Maidu Ave, Suite 170
NEVADA CITY, CA 95959-7902

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INDIVIDUAL LETTER 310: JAN ZIMMERMAN

Response to Comment Ind 310-1
This comment is introductory in nature and does not address the adequacy of the DEIR. Responses to specific comments are provide below.

Response to Comment Ind 310-2
The commenter states that cumulative effects analysis in the DEIR is inadequate in various areas of the DEIR but provides no further information. Therefore, no specific response is possible. In regard to quality of life concerns, please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Issues.

Response to Comment Ind 310-3
The commenter states that the DEIR inadequately assesses mitigation risk and questions what will happen if the Project Applicant fails to implement required Mitigation Measures, but provides no additional information. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 310-4
The commenter states that the project's impacts analyzed in the DEIR will last forever and asks whether the mitigation will last forever. The commenter is referred to Master Response 3 – Operator Responsibility and Appendix C of the DEIR.

Response to Comment Ind 310-5
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 310-6
The commenter states that the dewatering of the Idaho-Maryland Mine will leave nearby residents' private wells without groundwater and will adversely impact the economic value and property rights of nearby residents. Regarding the impacts to groundwater, the commenter is referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the economic value of the properties, the commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 310-7
The commenter states that the mitigation measures analyzed in the DEIR are too expensive or will fail but provides no further information or evidence. The environmental impacts of the proposed mitigation measures are analyzed in the DEIR. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 310-8
The commenter states that cumulative impacts do not match proposed mitigations, but provides no further information or evidence. Therefore, no specific response is possible.

Response to Comment Ind 310-9
The commenter references Comment Letter 10 from the Nevada Irrigation District (NID) and incorporates the same concerns as the NID. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Responses to Agency Letter 10 from the NID.

Response to Comment Ind 310-10

The commenter states that the dewatering of the Idaho-Maryland Mine will result in the discharge of toxic substances into South Fork Wolf Creek. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 310-11

The commenter assumes that the discharge of water into South Fork Wolf Creek will harm the creek. The commenter is referred to Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 310-12

The analysis in the DEIR is specific to the currently proposed project for the Idaho-Maryland Mine. The commenter is referred Master Response 13 – Historic Hydrogeologic Assessments.

Response to Comment Ind 310-13

The commenter states that the groundwater impacts associated with the San Juan Mine Ridge Mine constitutes a major problem with the Idaho-Maryland Mine DEIR. The San Juan Ridge Mine Project is not relevant to the analysis of the Idaho-Maryland Mine DEIR**.** The commenter is referred to Chapter 4.8 of the DEIR and Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 310-14

The commenter states that adverse water and toxic issues require the County to reject the project, but does not provide any additional information. The analysis in the DEIR determined that water and air impacts are less than significant after mitigation. The commenter is referred to Chapters 4.3 and 4.8 of the DEIR.

Response to Comment Ind 310-15

The commenter states that the current condition of the Centennial Industrial Site is not suitable for the placement of engineered fill. The commenter is referred to Master Response 9 – Historical Mine Waste at Centennial Site, and Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 310-16

The commenter references the approved remediation plan from the Department of Toxic Substances Control for the Centennial Industrial Site and asks if the DEIR includes analysis of the remedial action plan. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 310-17

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 9 – Historical Mine Waste at Centennial Site, and Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 310-18

The commenter states that former gold mining operations have deposited waste into the San Francisco Bay and asks if the Project Applicant will clean up certain toxics on the property it purchased in 2017, alluding to the Centennial Industrial Site. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 310-19

The commenter's opposition to the proposed project and speculation regarding whether the mitigations will be completed does not address the adequacy of the DEIR and has been noted for the decisionmakers. All mitigation measures for the project have been included in the Mitigation Monitoring and Reporting Program (MMRP) prepared for the project and included as Chapter 4 of this Final EIR. The MMRP gets adopted along with EIR certification, should this occur, and is used by County staff to track project compliance with mitigation measures. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 310-20

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Please also see the above responses.

Individual Letter 311

From: Janak Kimmel <janak.buddhist.yogis@gmail.com>
Sent: Tuesday, January 4, 2022 6:54 PM
To: Idaho MMEIR
Subject: due to current schedule - email response may be delayed Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR

Ind 311-1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I will try to get back to you as soon as I can. It may take days longer. Thank you.

1

INDIVIDUAL LETTER 311: JANAK KIMMEL

Response to Comment Ind 311-1

The comment does not address the adequacy of the DEIR.

Individual Letter 312

From: jane baylis-garcia <sanctuaryjbg715@gmail.com>
Sent: Sunday, April 3, 2022 6:26 PM
To: Idaho MMEIR
Cc: DEIRcomments@ceanc.org
Subject: Comments on the DEIR

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I have lived and worked in Nevada county for 30 years. My husband was an , and elected Fire Commissioner in Penn Valley from 2002-2006.I have worked in the local hospital as a Registered nurse.

Ind 312-1 Our children have attended school , my daughter teaches 2nd grade and my grandchildren are now in elementary school here. We have gathered many friends and coworkers during these years and frequently

discuss the changes and progress of our local community. I can definitely state that the overwhelming majority of these friends and family are extremely concerned with the plan that Rise Gold Company has of re-opening

the Idaho-Maryland mine.

Ind 312-2 I have read the DEIR and as a professional health worker , see many omissions of the health risks such a mine will pose to us as residents. There is inadequate protection in place for the monitoring of the air quality

(That is already bad in our community). In these times of inadequate rainfall and serious impacts to ground water, the plan does not sufficiently address the impact the millions of gallons of water that must be pumped from

Ind 312-3 the mine, just to begin the digging. Peoples wells will be impacted and that poses a real threat to residents and businesses.

Ind 312-4 The many negative impacts this opening will have on traffic, noise, toxic chemical waste piles, will wipe Grass Valley off the map as a place to tour and vacation, as well as a healthy place to raise

a family.

Ind 312-5 I will not go into detail, but the DEIR is a flawed piece of work that does not adequately provide for study and adequate protection on multiple subjects that are necessary for maintaining a healthy and

thriving community.

Ind 312-6 Rise Gold is posed to sacrifice our quality of life here in Grass Valley and the surrounding areas for their self-profit motives. They have a poor reputation for polluting in their own country and are

1

Ind 312-7

eager pursue doing the same to our community.

It is notable that we are still trying to clean up the environmental disaster left us by the last "gold-rush". We have more that allowable levels of Mercury, Arsenic and Heavy Metals in all our surrounding waters

and land.

Please do not allow this to go further without careful and complete examination of the risks to us all. We stand to lose our way of life, our health, our future just for the greed of a company that will take

its profits and leave us a poisonous place to try and live in.

Sincerely in hopes that you will keep our wellbeing in your decision.

Jane Baylis-Garcia

INDIVIDUAL LETTER 312: JANE BAYLIS-GARCIA

Response to Comment Ind 312-1
The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 312-2
Please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR for more information related to air pollution. As evaluated under Impact 4.3-2, and shown in Table 4.3-21, emissions of toxic air contaminants (TACs) would not result in health risks to nearby receptors in excess of NSAQMD thresholds. Nonetheless, Mitigation Measure 4.3-2 was included to ensure an Asbestos Dust Mitigation Plan is prepared, as required by the California Air Resources Board (CARB). Further information regarding the assumptions used when conducting the Health Risk Assessment for the proposed project is included in Master Responses 20 through 22. Finally, please also see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations.

Response to Comment Ind 312-3
Please see Master Responses 13 through 16 regarding groundwater, including drought and climate change.

Response to Comment Ind 312-4
The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 312-5
The comment expresses a general opinion that the DEIR is inadequate, but does not provide specific examples. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 312-6
The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 312-7
The comment is a closing remark and does not specifically address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 313

I ~~support~~ DO NOT re-opening the Idaho-Maryland Mine

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Please Vote against this Disasterous Mine !!

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jane Garcia

Address 18956 Sanctuary Rd ZIP 95946

Phone Penn Valley, CA

Email Address

Dist 4

Ind 313-1

INDIVIDUAL LETTER 313: JANE GARCIA

Response to Comment Ind 313-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 314

From: Jane Pomerantz Markham <janeandco@gmail.com>
Sent: Saturday, April 2, 2022 11:11 AM
To: Idaho MMEIR
Subject: opposition to the mine

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Dear Mr. Kelley,

I want to add my name with our Nevada County concerned citizens who oppose the mine for the many reasons thus stated.

Ind 314-1 Our beloved County does not need this horrible idea that would destroy everything we've worked so hard to create & recreate. If we could vote on this it would lose.

Thank you,

Jane Markham
18539 Alexandra Way
Grass Valley, CA 95949
530-913-9403

1

INDIVIDUAL LETTER 314: JANE MARKHAM

Response to Comment Ind 314-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 315

From: Jane Pelton <janepelt@gmail.com>
Sent: Thursday, March 24, 2022 10:27 AM
To: Planning
Subject: Public Hearing re: Idaho-Maryland Mine, 3/24

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Members of the Planning Commission

As a resident of Grass Valley, I urge you to listen to the independent experts who have researched the many potential impacts of the proposal to re-open the Idaho-Maryland mine – air, water, health, explosives, hydrology, energy, mine waste, monitoring, oversight – and who have determined that the DEIR under your consideration today is woefully inadequate for its purpose. The DEIR must be revised to include analyses of impacts that were underestimated or not evaluated, and to correct misleading conclusions.

Ind 315-1

Hardrock mining is a dirty business. Air, water, and soil impacts, and industrial accidents with the potential to cause great harm, are inevitable in this business.

It is my hope that Nevada County will at long last determine that hard rock gold mining in a populated region that is surrounded on all sides by homes, businesses, and schools, is in no way compatible with the community that Grass Valley has become. The mine property should be permanently zoned for a sustainable alternative job-producing purpose that will allow our region to thrive.

Jane Pelton

Grass Valley

1

INDIVIDUAL LETTER 315: JANE PELTON

Response to Comment Ind 315-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 316

From: Ed Scofield
To: Julie Patterson-Hunter
Subject: FW: Idaho Maryland Mine
Date: Tuesday, March 15, 2022 10:58:14 AM

Dist 1

-----Original Message-----
From: Jane Primrose <janenevadacity@gmail.com>
Sent: Tuesday, March 15, 2022 9:29 AM
To: Ed Scofield <Ed.Scofield@co.nevada.ca.us>
Subject: Idaho Maryland Mine

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Dear Supervisor Scofield,

I am writing you to express my thoughts regarding the decision whether to reopen the Idaho Maryland Mine.

Ind 316-1

To me there is only one issue. This is not about the pros and cons of gold mining. This is about opening a mine in the middle of a fragile population center where a significant portion of the population relies on wells for water. I consider our community to be fragile because of the ongoing threat of wildfire and the continued drought. To allow a mining operation where there is even the remotest chance that the tunnels could pierce the underground water supply cannot be allowed. Such a potential event would be devastating to our towns. I hope you have had an opportunity to visit the Empire Mine Visitor Center and view the model of the warren of mining tunnels already under Grass Valley.

Please do not allow the mine to reopen.

Thank you

Jane Primrose
13216 Tranquility Lane
Nevada City, Ca 95959

Sent from my iPad

INDIVIDUAL LETTER 316: JANE PRIMROSE

Response to Comment Ind 316-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 317

From: rubes@countryrubes.com
Sent: Sunday, April 3, 2022 6:50 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: I DO NOT SUPPORT THE OPENING OF THE RISE GOLD IDAHO MARYLAND MINE

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Dear Nevada County Board of Supervisors.

I want to make it known that I DO NOT SUPPORT the opening of the Idaho Maryland Mine for so many environmental reasons.

There have been many letters to the editor of the Union that I agree with and have put it so much more elegantly than me.

Ind 317-1 Steven Rugge: Water Vs Gold March 23, 2022 and Lew Sitzer March 25, 2022 I agree with these letters. In our drought and climate change situations, the thought of flushing away 3 million gallons of water A DAY does not make sense to me at all. We have a farm and must cut back on our water as to allow water for the environment, for the people, let alone the fish and wild animals. To allow this type of waste is inhumane.

Ind 317-2 There are many more letters such as this that we agree with. The Rise Gold EIR where there are obvious omissions of wildlife migration per the letter and video of Michael Shea: Draft EIR displays inadequacies March 20, 2022. This letter proves that the Rise Gold EIR structured their report to their needs and an independent EIR is in need to prove that Rise Gold would have impacts not only on wildlife and water, but noise and air pollution.

My vote is no on the Rise Gold Mine.

Thank you,

Janet Brisson
20693 Dog Bar Road,
Grass Valley, CA 95949

1

Janet Brisson
Country Rubes Enterprises
rubes@countryrubes.com
530-913-2724
www.countryrubes.com
20693 Dog Bar Road
Grass Valley, CA 95949



INDIVIDUAL LETTER 317: JANET BRISSON

Response to Comment Ind 317-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 317-2

Wildlife migration is address in Chapter 4.4, Biological Resources of the DEIR. Specifically in Impact 4.4-4 starting on page 4.4-92 of the DEIR. The DEIR was prepared by an independent consultant hired by Nevada County and all the technical reports were independently peer reviewed by consultants hired through the County. In its role as the lead agency, Nevada County decisionmakers will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Individual Letter 318

From: Janet Cinquegrana
To: Matt Kelley; daho.MMEIR@co.nevada.ca.us
Subject: Idaho Maryland Mine
Date: Wednesday, March 23, 2022 10:32:51 PM

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March 24, 2022

My name is Janet Cinquegrana and I reside at 140 Buckingham Ct in Grass Valley, district 3.

Ind 318-1 I want to voice my opposition to the reopening of the Idaho Maryland Mine. The mine poses so many threats to our air, water and quality of life. I am a homeowner and Wolf Creek flows through my property. I am concerned about the dewatering of the mine and the polluted mine water being pumped into Wolf Creek. I am concerned about the blasting that would occur and the pollution to our air, including releasing carcinogenic asbestos. I am concerned about the diesel truck exhaust and increased traffic. I am worried the opening of the mine would result in our property values being reduced by 20% or more. Furthermore, the mining industry does not create a lot of jobs. In fact in a list of 179 industries it is dead last at job creation. There are so many risks to the mine and little to none rewards. Please vote NO the reopening of the mine.

--
Janet Cinquegrana
140 Buckingham Ct
Grass Valley, CA 95949

INDIVIDUAL LETTER 318: JANET CINQUEGRANA

Response to Comment Ind 318-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts. In addition, see Master Response 35 regarding discharge into South Fork Wolf Creek. Impacts related to blasting are addressed in Chapter 4.7, Hazards and Hazardous Materials, as well as Chapter 4.10, Noise and Vibration, of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 319

From: Janet Cinquegrana
To: BOS Public Comment
Subject: Idaho Maryland Mine
Date: Friday, March 18, 2022 4:44:32 PM

Dist 3

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March 18, 2022

My name is Janet Cinquegrana and I reside at 140 Buckingham Ct in Grass Valley, district 3.

Ind 319-1 I want to voice my opposition to the reopening of the Idaho Maryland Mine. The mine poses so many threats to our air, water and quality of life. I am a homeowner and Wolf Creek flows through my property. I am concerned about the dewatering of the mine and the polluted mine water being pumped into Wolf Creek. I am concerned about the blasting that would occur and the pollution to our air, including releasing carcinogenic asbestos. I am concerned about the diesel truck exhaust and increased traffic. I am worried the opening of the mine would result in our property values being reduced by 20% or more. Furthermore, the mining industry does not create a lot of jobs. In fact in a list of 179 industries it is dead last at job creation. There are so many risks to the mine and little to none rewards. Please vote NO the reopening of the mine.

--
Janet Cinquegrana
140 Buckingham Ct
Grass Valley, 95949

INDIVIDUAL LETTER 319: JANET CINQUEGRANA

Response to Comment Ind 319-1

Please see Response to Comment Ind 318-1.

Individual Letter 320

February 12, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

There are many reasons this mine should NOT be reopened. My personal reasons are:

Ind 320-1

- Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
- Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area.
- Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells.
- The Rise Gold CEO already has numerous violations of mining and environmental laws.
- While Rise Gold shareholders profit, the local community gets little revenue.
- Where will the imported workers live when housing is so limited in our area?

I am a member of the local faith-based organization the Unitarian Universalist Community of the Mountains. Our values call us to use our human, spiritual and financial resources to make a difference in our local community and the world. Rise gold has demonstrated disrespect for the environment and the people of Grass Valley, for example, their unrepresentative survey. Stopping rise Gold would make a huge difference for all of us. I hope you will be among those who will be known to have stood against the well-funded deception Rise Gold Mine has developed.

Sincerely,

Janet L. Dunstan
19595 Bow Valley Road
Grass Valley, CA 95945
Phone number: 530-205-8154
Email: janetldunstan@gmail.com

RECEIVED
FEB 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Please copy to: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

INDIVIDUAL LETTER 320: JANET DUNSTAN

Response to Comment Ind 320-1

Please see Master Responses 1, 2, 3, and 14. In addition, please refer to Chapter 4.1, Aesthetics, and Chapter 4.12, Transportation with regard to impacts associated with hauling and piling waste rock, as well as Chapter 4.10, Noise and Vibration, and Chapter 4.6, Geology and Soils, with regard to impacts associated with blasting. Housing is addressed in Chapter 4.9, Land Use and Population and Housing. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 321

Ind 321-1

I support re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) JANET RICHMAN

Address 20832 Rising Sun Rd. GV. 95945

Phone

Email Address

INDIVIDUAL LETTER 321: JANET RICHMAN

Response to Comment Ind 321-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 322

From: Janet Rosner
To: bdofsupervisors
Subject: Mine
Date: Monday, February 21, 2022 5:55:50 PM

Dist 1

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To: bdofsupervisors@co.nevada.ca.us
Subject: Mine

Ind 322-1

Do not reopen the mine...the increased air pollution, risks to waterways and traffic are not worth it. It would negatively impact our community.
Janet Rosner
15737 American Hill Rd., Nevada city

Sent from AT&T Yahoo Mail for iPhone

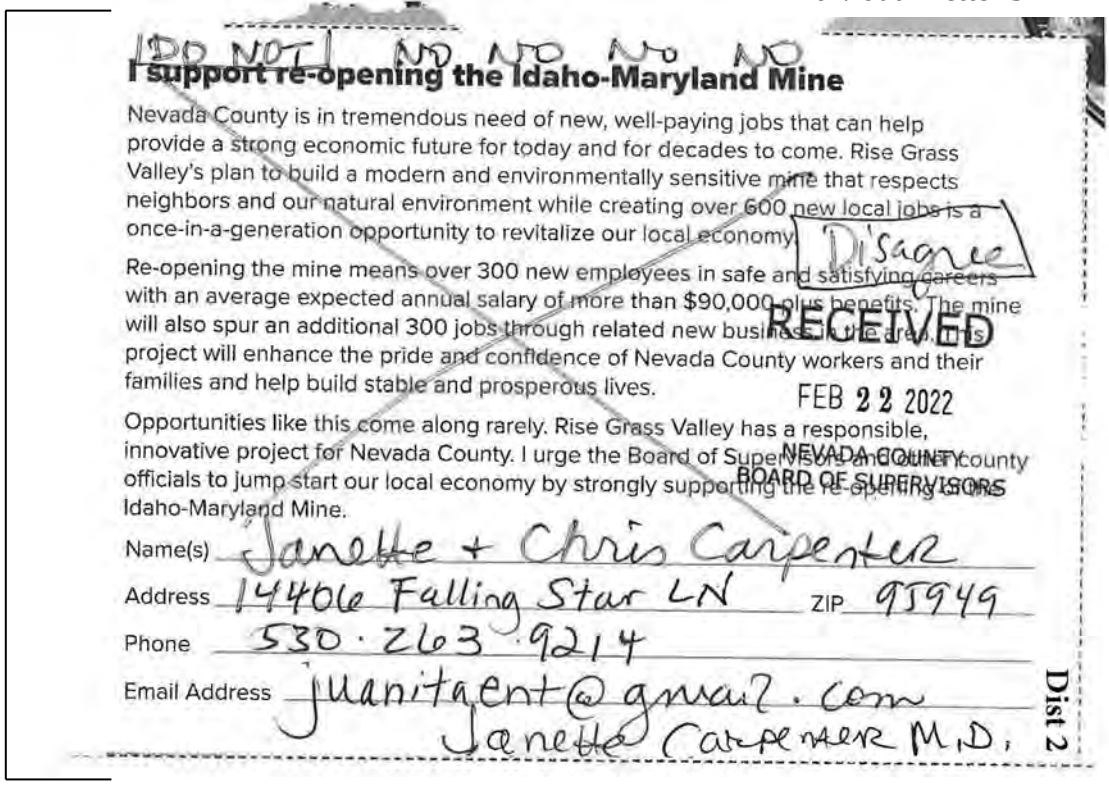
INDIVIDUAL LETTER 322: JANET ROSNER

Response to Comment Ind 322-1

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 324

Ind 323-1



I DO NOT NO NO No NO

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

D'Agnese

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Janette + Chris Carpenter

Address 14406 Falling Star LN ZIP 95949

Phone 530.263.9214

Email Address juanitagent@gmail.com

Janette Carpenter M.D.

Dist 2

INDIVIDUAL LETTER 323: JANETTE AND CHRIS CARPENTER

Response to Comment Ind 323-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 324

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

April 3, 2022

Dear Mr. Kelly,

My name is Janice Bedayn, I am a 23-year resident of downtown Grass Valley, and work for the nonprofit organization Sierra Harvest. I am concerned about the Idaho-Maryland Mine DEIR submitted for review for many reasons, but my primary concern is the proposed mitigation for air quality.

Ind 324-1

As many residents of Nevada County have done, I installed an Air Quality app on my phone, so that I can determine the safety of leaving my home to work or recreate in the outdoors. It is frightening that we already are burdened with an average of 102 days in which the air is considered "unhealthy" and with the advent of wildfires, our air quality is too often considered "very hazardous".

Ind 324-2

Mitigation of CHG emissions in the DEIR are weak, especially when qualifiers such as "where feasible" are inserted, such as 4.3-7 (a) b) which employs electrical or alternative fueled construction equipment. Who monitors "where feasible"? Electrical construction equipment would indeed go a long way to mitigate CHG emissions, but how much of that equipment is available? If it is expensive, is it still feasible? Who determines that?

Ind 324-3

More concerning is 4.3-7 (b) which employs carbon offsets for construction emissions. How does a carbon offset improve the air quality in Nevada County? Carbon offsets may be a valuable tool in addressing global climate change, but the Idaho-Maryland Mine Project's carbon offsets will do nothing to mitigate the impact of unhealthy air in our local community.

Ind 324-4

Please require that this project employ more stringent mitigation efforts for air quality, and ensure that those efforts will be monitored, with an identified monitoring agency, and what their responsibility entails to keep the community informed. The suggested mitigations in the current DEIR are simply inadequate to the task. A further assault on our air quality in Nevada County will harm our health and well-being, economy, and quality of life.

Thank you,

Janice Bedayn
311 Bernice Drive
Grass Valley, CA 95945

INDIVIDUAL LETTER 324: JANICE BEDAYN

Response to Comment Ind 324-1

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers. Please see Master Response 1.

Response to Comment Ind 324-2

The commenter states that GHG mitigation measures are "weak" because they include qualifying terms such as "feasible" for implementation of mitigation. While the commenter describes the mitigation as weak due to the qualifying language that the mitigation must be feasible, this term come directly from the CEQA Guidelines. (see 14 CCR Sec. 15041(a).) Per CEQA Guidelines Section 15041, a CEQA lead agency has authority to require "feasible" mitigation, and conversely does not have authority to impose mitigation that is infeasible. Availability of electric equipment and vehicles and alternative fuel equipment is changing as technology improves, so it is appropriate that this mitigation measure includes a feasibility and commercial availability standard. Based on these qualifying terms, use of electric equipment that is not now available may at a later date be required by the County under this mitigation measure. The County has enforcement authority for Mitigation Measure 4.3-7, so it would be at the County's discretion to determine whether a particular electric vehicle or type of equipment is feasible in economic or practical terms. Note that the project is already proposing to use all electrical equipment underground, which reduces GHG emissions compared to use of diesel equipment below the surface.

Response to Comment Ind 324-3

Greenhouse gas emissions contribute to climate change but are not directly related to health impacts. Please see Chapter 4.3 of the DEIR in regard to the analysis of health risks from the project's air emissions. The carbon offsets are required to mitigate emissions of greenhouse gases and the related global climate change impacts, so the local air quality is not related to this mitigation.

Response to Comment Ind 324-4

Please see Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollution Thresholds During Operation. A mitigation monitoring and reporting program is included as Chapter 4 of this Final EIR, which sets forth all mitigation measures imposed in the DEIR and will be used by the County for enforcement purposes.

Individual Letter 325

Dist 3

RECEIVED

MAR 0 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

February 24, 2022

Dear Nevada County Board of Supervisors:

Ind 325-1 My name is Jason Privett and I live near the Empire Mine State Park in District 3 with my wife and our baby daughter. I am writing this letter to urge you to vote NO on the Idaho-Maryland Mine.

My wife and I moved to Grass Valley in August 2021 to escape the crime and noise of San Francisco. We were drawn to the natural surroundings of Grass Valley and the peaceful landscape. We didn't know at the time that the mine was being considered, otherwise, we would've chosen to move elsewhere.

Ind 325-2 Our daughter's pediatrician recently informed us of the negative health consequences the mine will have on our family if it is approved. This saddens us deeply. We are very health conscious and moved here because we thought it would be a healthier environment to raise our daughter. I am a longshoreman at the Port of Oakland where I am subjected to loud industrial noises. As a result, I have experienced negative health consequences. This influenced me to extensively study sound healing and the negative health impacts of loud noises and vibrations. I worry such vibrations and noises produced by the mine will severely damage the health and happiness of our community and the reasons people are drawn here.

Ind 325-3 Please do not damage our scenic community and pollute our water and air. We moved here for a healthier life for our beloved baby daughter, not increased toxins and industrial vibrations. Please vote No on the Idaho-Maryland Mine.

Sincerely,

Jason Privett

INDIVIDUAL LETTER 325: JASON PRIVETT

Response to Comment Ind 325-1

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 325-2

Please refer to Chapter 4.10, Noise and Vibration, regarding impacts related to noise. The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 325-3

The commenter expresses general concerns regarding the impacts of the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 326

Sierra Metal Fabricators Inc.

529 SEARLS AVE., NEVADA CITY, CALIF. 95959 • PHONE (530) 265-4591 • FAX (530) 265-4034

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 94959-8617

Mr. Kelley:

I am writing today in support of Rise Grass Valley's application to re-start the Idaho-Maryland mine and rehabilitation of the Centennial site adjacent to Highway 49. Our company believes this project will be vital to the future of Nevada County and we urge the Board of Supervisors to approve the project with haste.

Sierra Metal Fabricators was founded in 1974 in Nevada City. We have a long and solid history and investment in Nevada City and Nevada County, and we know how difficult it is for people to make ends meet here. In recent years our county has changed a great deal as more and more out-of-county retirees have purchased homes in the area. While their arrival is more than welcome, we've unfortunately seen the county become less understanding of the need to build industry locally that can offer a young workforce a reason to invest and grow in this county. Simply put, too many of our young people in this county are forced to leave for better opportunities elsewhere.

Ind 326-1

The Idaho-Maryland Mine is a chance to turn that around – provide young people in our county with a chance to prosper without moving to Roseville, Sacramento or Reno to make ends meet. Think about it: 312 direct new jobs, and maybe as many as 1,000 more created from companies that partner with Rise Gold – Is there any other local project offering that kind of growth on the horizon?

If the Board of Supervisors rejects the Idaho-Maryland Mine, what kind of jobs plan do you have to replace it with? What other businesses will dare to invest in Grass Valley if they see our County leaders turn up their noses at the opportunity to inject new wealth into our region.

I have already had the opportunity to do business with Rise Gold, in support of their recent core drilling program. I found their personnel to be both professional and competent. I believe them to be an organization not just interested in operating a profitable business, but one that is dedicated to operating in a responsible manner and being an important member of the local community.

For the good of our residents and our local economy, I urge you to support Rise Gold's Idaho-Maryland Mine re-opening.

Jason White – Owner
Sierra Metal Fabricators
529 Searls Ave.
Nevada City, CA 95959

INDIVIDUAL LETTER 326: JASON WHITE

Response to Comment Ind 326-1

The comment expresses support for the project, but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 327

From: jay jacquet
To: BOS Public Comment
Subject: Objection to proposed mine and mailer
Date: Wednesday, February 16, 2022 4:22:11 PM

Unable to identify Dist

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Hello,

I have received a mail-in card from the proponents of the Idaho Maryland Mine which only has one option- support. Which is misleading and not in keeping with the citizen's goals which are clean air, clean water and protection of the land.

If the Board is aware of this mailing, it may want to intervene and offer an option of opposing the project.

I am a senior citizen and a former City, State of California, and U.S. Dept of the Interior employee. I urge the Board to abandon this campaign to reopen the mine for the obvious reasons: that mitigations and proposed green-friendly practices are not the same as no interference with water, air quality and quality of life in this Community. Developer's proposals in this case are false and misleading.

Ind 327-1 As a former City Clerk, I understand the way Developers present false statistics and promise more than can be delivered when trying to persuade Agencies to vote their way in the name of jobs and not ruining the land.

I sincerely hope that intelligent decisions by the Board which forbid these types of developments in our County will prevail. If the project is approved, there will be no way to reverse all the damage to the environment. Mitigations proposed are false in this type of a project. There will be negative results.

If this Mine proposal comes to the voters, it will fail. If the Board approves the mine, all of Nevada County will fail.

I urge a no vote on the mine and the Board's refusal to allow a company from out of the Country to do business and to do harm in Nevada County.

J E de Sevren Jacquet
Resident and Voter

INDIVIDUAL LETTER 327: JAY JACQUET

Response to Comment Ind 327-1

The commenter expresses general concerns regarding the proposed project but does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 328

From: louis Quaintance
To: Idaho MMEIR
Subject: DEIR comments
Date: Monday, April 4, 2022 9:43:51 AM

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To: Nevada County Planning Commission
Attn: Matt Kelley, Senior Planner
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

To the Planning Commissioners and Staff

Ind 328-1 As a resident of Nevada County, I am very concerned about Rise Grass Valley's proposal to reopen the Idaho-Maryland Mine.
The Draft EIR for the proposal should adequately address the mine's potential environmental impacts and include adequate mitigations for all impacts.
Instead the DEIR shows a lack of responsible due diligence to address many community concerns about this project.

Ind 328-2 **Chapter 1.3 Approach to Centennial Industrial Site Baseline**
The proposed DTSC remediation project to clean up the Centennial Site should have been included as part of this DEIR. How can total impacts of the Mine Project be understood if baseline conditions at both sites are not established prior to all work done for both projects? What are the cumulative environmental impacts when the Centennial Site DTSC project is included as part of this DEIR?

Ind 328-3 **Chapter 4.3 Air Quality and Green house Gas Emissions**
Additional car, truck, onsite diesel and gas engines will contribute significant emissions because of this project. During Public Safety Power Shutdowns, the mine intends to use emergency generators for continuing operations. Nevada County is vulnerable to the effects of Climate Change, including increased risk of wildfires.
Already, Western Nevada County has been designated a "non-attainment area for ozone", as monitored by the California Air Resources Board.

Ind 328-4 Given the increase in emissions of the proposed project, how can Nevada County attain the goal of 51% reduction in greenhouse gas emissions, as called for in the Nevada County Energy Action Plan, if this project is approved?

Ind 328-5 How does the County attain 3% annual reduction in ozone if this project is approved?

Ind 328-6 The DEIR should require measurement and effective mitigations over all 80 years of mine operation. Why are air quality measures being limited to one year of construction?

Ind 328-7 What are the planned alternative transportation options to cars and trucks?
What is planned beyond minor adjustments to traffic flows?

Ind 328-8 Alternatives to "open burning of vegetative matter shall only be used unless deemed infeasible". What are the conditions that make this mitigation infeasible?

Ind 328-9 Use of the Grid is offered as mitigation, as if the Grid does not create emissions to generate power. Certainly, climate change and drought conditions will reduce available hydro-electric power. How can the Grid be depended upon to generate power that does not produce emissions?

Ind 328-10 Buying carbon offsets will do little to mitigate local impacts of this project's emissions. How can offset benefits stay local to improve air quality within Nevada County?

Ind 328-11 The mitigations for Greenhouse Gas Emissions are dependent on future actions of households and other commercial businesses to reduce their emissions throughout California. Why isn't this proposed project taking responsibility for its emissions? Any reductions that others can attain should not be used to justify this project's level of emissions.

Ind 328-12 Does the DEIR address emissions in conjunction with the development of properties in the surrounding area in Nevada County? What are likely future emissions when all planned development is accounted for in measuring total impacts?

Ind 328-13 **Chapter 4.4 Biological Resources**
The goal of the California Biodiversity Initiative "is to secure the future of California's biodiversity". One of its broad goals is to "Preserve ecosystems at the regional scale, with sufficient linkages, buffers, and refugia to provide a robust future for all native species in the face of climate change". This DEIR does not adequately address mine impacts on the "linkages, buffers, and refugia" located on and near the property.

Ind 328-14 Empire Mine State Historic Park borders the Rise GV property.
Wolf Creek flows through, and adjacent to, the Rise GV property. Wolf Creek's watershed includes varied habitats along the creek, its associated meadows, and the pond located on the Brunswick site. The DEIR misrepresents the nature of the property's wetlands. For example, the "clay-lined pool" is actually a vibrant habitat for native California flora and fauna.

Ind 328-15 The Peer Review of the Biological Resources Reports Prepared for the Proposed Idaho-Maryland Mine, done by Madrone Ecological Consulting, states the DEIR "fails to analyze the Project's effects on the special-status species with potential to occur within South Fork Wolf Creek or downstream areas".
"Lack of documentation of a species during a non-protocol level survey should not be considered justification for low rankings".

Ind 328-16 The DEIR cites surveys which were done in December 2018, July/August 2019, August 2020; not the best months for trying to document migrating and breeding birds. At minimum, surveys should have been done when native plants and wildlife are "evident and identifiable".

Ind 328-17 In an area of Empire Mine State Historic Park, 1/2 mile from the proposed project, Gold Country Avian Studies has data that documents
Willow Flycatcher, a California Endangered Species

Olive-sided Flycatcher, a CDFW Species of Special Concern
Yellow-breasted Chat, a CDFW Species of Special Concern
Yellow Warbler, a CDFW Species of Special Concern
Data of these bird species has been submitted to the California Natural Diversity Database. This documentation of vulnerable bird species, and mitigations for impacts to them, should have been included in the DEIR.

4.10 Noise and Vibration

Ind 328-18 The DEIR does not adequately address the impacts of noise and vibration on wildlife, especially on nesting bird species. The noise levels considered "less than significant" in the DEIR go beyond those that impact wildlife. Mitigations should result in levels below 40 dBA in the South Fork Wolf Creek watershed within the Mine properties and all areas of the Mine that border Empire Mine State Historic Park.

Ind 328-19 The majority of studies documented effects from noise, including altered vocal behaviour to mitigate masking, reduced abundance in noisy habitats, changes in vigilance and foraging behaviour, and impacts on individual fitness and the structure of ecological communities. **This literature survey shows that terrestrial wildlife responses begin at noise levels of approximately 40 dBA, and 20% of papers documented impacts below 50 dBA.** Our analysis highlights the utility of existing scientific information concerning the effects of anthropogenic noise on wildlife for predicting potential outcomes of noise exposure and implementing meaningful mitigation measures." A synthesis of two decades of research documenting the effects of noise on wildlife, Shannon, et al Biological Reviews, 26 June 2015

Ind 328-20 CEA, Community Environmental Advocates, has written an extensive list of comments on behalf of many concerned Nevada County community groups. As a member of Sierra Foothills Audubon Society and Redbud Chapter of the California Native Plant Society, I urge that all these comments be considered seriously, and the DEIR corrected.

Ind 328-21 Nevada County is a beautiful place to live and work despite its history of gold mining. We are surrounded by signs of the environment's recovery from the destructive nature of past mining projects. Why should Rise Grass Valley be permitted to add to the sad history of environmental destruction in Nevada County for 80 years into the future and beyond?

Sincerely,

Jean Matsuno
10777 Banner Mine Way
Nevada City, CA 95959
email: ltquam@gmail.com

INDIVIDUAL LETTER 328: JEAN MATSUNO

Response to Comment Ind 328-1
The commenter states the DEIR is inadequate but provides no specifics or evidence in this comment. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 328-2
Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 328-3
Criteria pollutant emissions and greenhouse gases from the project are analysed in Chapter 4.3 of the DEIR and impacts have been determined to be less than significant after mitigation. The DEIR assumed 100 hours of generator use in the air quality analysis; however, extended use of generators is speculative and CEQA does not require analysis of speculative impacts. Given that it is unknown if/ when a PSPS would occur, it is considered a speculative event, and per the CEQA Guidelines, if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The use of emergency generators is speculative and beyond the reasonable control of the applicant. However, criteria air pollutant emissions associated with 24-hour operation of the emergency generators is provided in Table 4.3-25 of the DEIR on page 4.3-104 for informational disclosure purposes only.

DEIR Chapter 4.13 analyzed the project's potential contribution to wildfire risk. Regarding climate change, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 328-4
Please see Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Ind 328-5
Please see Master Response 18 – Air Quality Thresholds. The County's attainment of compliance with ozone standards is to be achieved by County-wide implementation of Northern Sierra Air Quality Management District thresholds and mitigation, as well as continuing improvements in technology and emissions standards. The Project Applicant is not solely responsible for meeting the County's air quality objectives.

Response to Comment Ind 328-6
Air quality measures are not limited to one year of construction. Please see Chapter 4.3 of the DEIR. Also see Master Response 19 – NSAQMD Criteria Pollution Thresholds during Operations.

Response to Comment Ind 328-7
As discussed on page 4.12-82 of the DEIR, because the proposed project is anticipated to directly employ approximately 312 employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the Project Applicant would be required to submit to the County a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence. Please see pages 4.12-82 through 4.12-83 for further information. Further, the proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces).

Response to Comment Ind 328-8

The Final EIR will clarify that burning of vegetative material will be prohibited in a condition of approval, which shall be included in the mitigation monitoring and reporting program.

Response to Comment Ind 328-9

Electrical grid power generates no on-site air emissions. Electrical grid power indirectly generates greenhouse gases (GHG) from power generation, but substantially less greenhouse gas emissions than diesel or gasoline powered generators and machinery.

Response to Comment Ind 328-10

Climate Change is a global impact, so purchase of carbon offsets is related to a global impact rather than local air quality. Also see Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 328-11

Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 328-12

Please see Chapter 4.3 regarding analysis of cumulative air quality impacts. Also see Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 328-13

The DEIR biological impact analysis is based on the guidance provided in the CEQA guidelines, Appendix G. DEIR Chapter 4.4 analyzed six different biological impacts including potential impacts to special status species and associated habitat and migratory corridors.

Response to Comment Ind 328-14

The DEIR, and Appendix F.7, correctly identify the onsite pond as a historic man-made clay-lined pond that was associated with historic saw milling operations. The pond is non-jurisdictional pursuant to the federal Clean Water Act but may be considered a “water of the State of California.” Special status species that may use the pond and surrounding habitat were considered in Impact 4.4-2 and impacts to “waters” was considered in Impact 4.4-3.

Response to Comment Ind 328-15

The Madrone peer review was in regard to the draft copies of the various biological studies completed by the applicant’s biological consultant and not the updated analysis that served as a basis for the DEIR. As stated on page 4.4-1 of the DEIR, the reports were updated, as necessary to address the comments included in the third-party independent peer review performed by Madrone Ecological Consulting, Inc. under contract with Raney. Please see Master Response 30 – Technical Study Adequacy.

Response to Comment Ind 328-16

Please see Master Response 30 – Technical Study Adequacy, and Master Response 37 – Birds and Raptors.

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these

species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it was less than significant.

Response to Comment Ind 328-17

Please see Master Response 37 – Birds and Raptors.

Response to Comment Ind 328-18

Noise and vibration impacts to species was analyzed in DEIR section 4.4.4, Impact 4.4-2, and was determined to be less than significant. It should be noted, increases in daytime and nighttime ambient noise level increases caused by activities at the Brunswick Industrial Site do not extend to the Empire Mine State Park (EMSP) boundary (see DEIR Figure 4.10-7). Engineered fill placement at the Centennial Industrial Site is the closest project activity to the EMSP and could last approximately 6 years. The nearest receptor to the EMSP is number 8 (see DEIR Figure 4.10-3) and the closest noise and vibration measurement location is number 7 and 8 (see Figure 4.10-3). As shown in DEIR Table 4.10-12, Centennial Industrial Site engineered fill activity does not exceed existing baseline noise levels (see Table 4.10-6). As a result, wildlife species that may use the EMSP should not experience an increase in noise levels above ambient levels and therefore, such impacts would be considered less than significant.

Response to Comment Ind 328-19

Please see Response to Comment Ind 328-18 above.

Response to Comment Ind 328-20

Comment noted. Please see responses to comments in Group Letters 7 and 8.

Response to Comment Ind 328-21

The commenter’s opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 329

Dear Rise Mine Project

Ind 329-1 We would like to voice my opposition to this project.
Our main concern is the impact on the groundwater water and the straining the limited water resources we are currently facing in a decade long drought.
Specifically the disruption of water tables ,fissures and aquifers that are in place currently meeting the demands of the Nevada county population.

Referring to The Rise Mine DEIR

Ind 329-2 Putting a strain on the already existing water resource by:
1) The need to purchase 5,700 gallons per day for the Rise Mine Project potable water needs as well as 42,000 gallons per day for dust suppression; this combined estimated total per year is over 17 million gallons annually.

Ind 329-3 2) The disruption of existing wells by draining the mine and impacting water tables in place for decades

3) The mine development plan calls for new tunnels being drilled at all times in any and all directions. This **will** impact water tables and water sources further siphoning an already fragile water eco system.

Ind 329-4 As a homeowner we are dependent on groundwater.
Working for 50 years in a profession that consumes millions of gallons of potable water .I believe this water need estimate to be severely under projected.
This is a lot of water farmers, ranchers, wildlife and the public would no longer have access to.

Ind 329-5 I am deeply concerned that the Rise Mine Project will impact groundwater and run wells dry leaving homeowners with worthless property that is uninhabitable, devalued and unable to be sold.

Sincerely
Michael and Jeannine Mayer

INDIVIDUAL LETTER 329: JEANNINE MAYER

Response to Comment Ind 329-1

The commenter opposes the project primarily due to the project's impacts to groundwater water supplies during the drought. The commenter does not discuss the adequacy of the DEIR. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 329-2

The commenter is concerned about the project's water usage but does not identify any inadequacies with the DEIR analysis. The commenter's concerns about the project have been forwarded to the decisionmakers.

Response to Comment Ind 329-3

The commenter states that the project will adversely impact groundwater wells but does not state how the DEIR is inadequate in this regard. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality), which found impacts to groundwater supplies to be less than significant after implementation of mitigation. The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 329-4

The commenter states that the project will expand underground mine workings and disrupt groundwater wells, but provides no additional detail on why the DEIR's analysis of impacts to groundwater in inadequate.

The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR and Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 33 – Groundwater Dependent Vegetation, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 329-5

The commenter reiterates concerns regarding groundwater and states that impacts to private wells will devalue property. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Individual Letter 330

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170 Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us

March 23, 2022

Dear Mr. Kelly, and the Planning Commission/Board of Supervisors,

Ind 330-1 My name is Dr. Jeff Brownwood, a family practice physician and Nevada County resident of 24 years. As a physician, parent and a concerned citizen, I have significant concern about the viability and the advisability of reopening the Idaho Maryland Mine with an 80 year mining operations permit, based on the Draft Environmental Impact Report.

The DEIR for this permit is inadequate to consider granting this permit. There are so many impact concerns, both presumably mitigatable and unmitigatable, it is inconceivable to me that the Board would consider granting the permit. The impact concerns revolve around the quality of life in Nevada County, noise, traffic , environment, water risks, and property values.

Ind 330-2 When land use zoning was initially created in our area, industrial mining was the charter in the late 1800s. We are now a residential and light business area. Allowing a large industrial mining operation to reopen for all practical purposes in residential Grass Valley is so short sighted and irresponsible, to me, it ultimately defies comprehension.

As a physician, if a medicine or treatment has more risks than benefits, you do not use that medicine. You might fix something specific but overall kill the patient.

Ind 330-3 The thing that really got my attention is the permit is to run , 24/7 for 80 years, heavy cargo truck loads of ore out highway 174 or 49, something like 14,000 loads per year. The noise and congestion would make our rural towns low quality places to live. House values would go down 10-20% in my opinion. For all intents and purposes this is a hidden $50k tax on every homeowner in Nevada County to fund this project. And, within a several mile radius, I have concerns that dewatering the mine and vibration from operations will impact well water supply to many homes.

Ind 330-4 The DEIR specifically identifies 3 unmitigatable impacts and 85 presumably mitigatable impacts. I have real concern that a large industrial business such a Rise Gold figures is it will much easier and better to ask for forgiveness than for permission when it comes to the presumably correctable environmental impacts.

The unmitigatable three impacts are Aesthetics, noise and vibration, traffic congestion. The reality is: mining involves what the DEIR itself calls "reasonably foreseeable" accidents, lack of proper management, oversight and mitigation. Multiply those concerns over 80 years and this transforms Grass Valley and Western Nevada County into an industrial area.

Ind 330-5 A large, heavy industrial operation with its blasting, processing and transporting immediately adjacent to Grass Valley (and very close to the Gold Hill and Greenhorn Rd neighborhoods) would significantly impact the quality of life of our community at large, degrade the environmental integrity of the Wolf Creek watershed, and potentially be a hazard and a danger to all. The DEIR lists "significant impacts" also to water quality, air quality, the emission of green house gasses , wetlands, and species of concern. The project also proposes sending all the mine water it needs to pump out of the mine daily into the Wolf Creek watershed, through Grass Valley, and involves other impactful details the DEIR does not consider a problem.

Ind 330-6 The DEIR also suggests that all but three of the 85 significant impacts can be mitigated to at least reasonable levels. However, if we multiply those concerns over 80 years, Grass Valley and Nevada County are transformed into heavy industrial area. This is not reasonable or desirable. The DEIR is inadequate to consider proceeding further with the permit. Please address these concerns as you and the Board move forward with your deliberations.

With concern for our county and quality of life,
Sincerely ,

Jeff Brownwood, DO
16400 Lake Vera Purdon Rd.
Nevada City, CA 95959
jobcomm1203@yahoo.com (530) 815-6649

INDIVIDUAL LETTER 330: JEFF BROWNWOOD

Response to Comment Ind 330-1

The commenter is opposed to the project based on several impacts discussed in the DEIR. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues. Impacts of the project to the environment, traffic, noise, and water are analyzed in the DEIR. In regard to quality of life and property values, the commenter is referred to Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 330-2

The commenter states that the Nevada County is now a residential and light industrial area and does not want a mining operation in the community. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 330-3

The commenter is concerned that the Idaho-Maryland Mine would operate 24 hours a day, 7 days a week for 80 years and the traffic impacts the project would generate. The commenter is specifically concerned about traffic impacts to State Routes 49 and 174. The DEIR states that operation truck traffic would, at the most, occur from 6:00 AM to 10:00 PM. (DEIR, Table 4.12-7.) The DEIR also states that no project truck traffic would occur on State Route 174. (DEIR, Table 4.12-9.) The DEIR's Chapter 4.12 (Transportation) analyzed traffic impacts and found those impacts to be less than significant after mitigation, with the exception of the intersection at Brunswick Road and State Route 174 and the Brunswick Road and Sutton Way intersection, where impacts would be significant and unavoidable even after implementation of mitigation. (DEIR, pp. 4.12-56, 116.) The commenter is also concerned about impacts to noise and impacts to private wells from the dewatering of the mine but does not provide any additional information. Those potential impacts were analyzed in Chapter 4.8 (Hydrology and Water Quality) and Chapter 4.10 (Noise and Vibration). Finally, the commenter states that the project would result in decreased property values. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, Master Response 2 – Social and Economic Impacts, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 330-4

The commenter references Impact 4.7-2 which discusses hazards to the public through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. (DEIR, p. 4.7-35.) However, the commenter does not provide any additional information on why the DEIR is inadequate. As stated on page 4.11-25 of the DEIR:

> In addition, underground metal mining has injury rates similar to residential construction and injury rates are significantly less than agriculture, truck transportation, and logging. The non-fatal lost time injury rate for underground metal mining of approximately 1.5 injuries per year per 100 workers is similar to that experienced in the residential construction industry.[29,30] From the period of 2016 to present, only two fatal injuries have occurred in all the underground metal mines combined in the United States (both in 2018).[31,32]

The commenter is also referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 330-5

The commenter states that the discharge of the treated water to South Fork Wolf Creek will degrade the watershed but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Master Response 35 – Discharge to South Fork Wolf Creek. The commenter also raises concerns regarding hazards, water quality, air quality, and GHGs, wetlands, and species of concern, but provides no information on which to formulate a specific response. These impacts are discussed in Chapter 4 of the DEIR. In regard to quality of life and property values, the commenter is referred to please see Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 330-6

The commenter states that the DEIR's impacts, which are less than significant after mitigation, will become significant over the course of the 80-year project but does not explain why. Cumulative impacts have been analyzed in the DEIR. The commenter's opposition to the Proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Individual Letter 331

From: Jeff Claussen <jclaussen395@gmail.com>
Sent: Monday, April 4, 2022 9:12 AM
To: Idaho MMEIR
Subject: Comments for Draft EIR on Mine reopening

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Please see my comments for the Draft EIR on the proposed Idaho Maryland Mine reopening: **Ind 331-1**

1. What agency regulates and inspects storage and safety of explosives on the mine property? **Ind 331-2**
2. How often would these inspections take place? **Ind 331-3**
3. What are the OSHA guidelines for above ground explosive inventory storage and the distance to residential areas? **Ind 331-4**
4. Regarding explosive material delivery to the site, who would ensure that delivered explosives are immediately taken underground for storage? **Ind 331-5**
5. How quickly would this take place upon opening the mine if the tunnels are not structurally safe and dewatered yet? **Ind 331-6**
6. There will be above ground explosive inventory storage at some point in the mine operation schedule, so where and how would that happen? **Ind 331-7**
7. Who would inspect that storage facility? **Ind 331-8**
8. How would any above ground explosive inventory storage affect wildland firefighting efforts and response considering potential explosive hazards in the event of a wildland fire event? **Ind 331-9**
9. How would this potential hazard of above ground explosive inventory storage affect the major public evacuation route of Highway 174 in the event of a large regional wildfire considering the proximity of Highway 174 to the mine property? **Ind 331-10**
10. Regarding the Centennial Property, how would the mine waste rock be disposed of there? **Ind 331-11**
11. What are the hours of operation? **Ind 331-12**
12. Will there be night lighting? **Ind 331-13**
13. What about noise and dust from equipment operation? **Ind 331-14**
14. How would arsenic in the mine waste rock be controlled from spreading via dust and wind to the surrounding community and downtown Grass Valley? **Ind 331-15**
15. How would the dust levels be monitored and mitigated if found to be unhealthy? **Ind 331-16**
16. What are the OSHA and Nevada County Environmental Health Regulations regarding arsenic and asbestos dust from construction activities?

Thank you,
Jeff Claussen
jclaussen395@gmail.com
Nevada City resident

INDIVIDUAL LETTER 331: JEFF CLAUSSEN

Response to Comment Ind 331-1
The commenter asks which agency is responsible for regulating and inspecting the storage of explosives at mining operations. The onsite storage and use of explosives is regulated by state and federal laws and regulations as discussed on pages 4.7-23 through 4.7-28 of the DEIR. The U.S. Mine Safety and Health Administration (MSHA) is responsible for the inspection of explosives storage and use in underground mines.

Response to Comment Ind 331-2
The commenter asks how often inspections occur for the use of explosives at mining operations. As stated on page 4.7-13 of the DEIR, MSHA is required to inspect each underground mines at least four times a year.

Response to Comment Ind 331-3
The commenter asks what OSHA guidelines govern above ground explosives. The project does not propose to store explosives on the surface.

Response to Comment Ind 331-4
The commenter asks who would ensure that explosives delivered to the project site are immediately taken underground for storage. The management and employees of the mine are responsible for transferring explosives from surface to underground.

Response to Comment Ind 331-5
The commenter asks how soon explosives would be needed should the Idaho-Maryland Mine reopen. Explosives would not be required before the mine is dewatered. Explosive magazine and ground support requirements for explosives storage areas are discussed on pages 4.7-26 through 4.7-28 of the DEIR.

Response to Comment Ind 331-6
The commenter asserts that the project will, at some point, store explosives on the surface. The project does not propose to store explosives on the surface.

Response to Comment Ind 331-7
The commenter asks who would inspect the explosives storage facility. MSHA would inspect underground explosive storage facilities.

Response to Comment Ind 331-8
The commenter asks how aboveground storage of explosives would impact wildland firefighting efforts. The project does not propose to store explosives on the surface.

Response to Comment Ind 331-9
The commenter asks how aboveground storage of explosives would impact an evacuation during a wildfire. The project does not propose to store explosives on the surface.

Response to Comment Ind 331-10
The commenter asks how the engineered fill would be placed at the Centennial Industrial Site. As stated on page 3-33 of the DEIR, the engineered fill would be transported from the Brunswick Industrial Site to the Centennial Industrial Site using haul trucks. Approximately 1.6 million tons

of engineered fill would be trucked from the Brunswick Industrial Site to the Centennial Industrial Site over a five-year period for placement and compaction. The average transport of engineered fill would be 1,000 tons per day or 365,000 tons per year. A maximum transport rate of up to 2,000 tons of engineered fill per day is required to make up for periodic weather or operational delays. Truck payloads would be approximately 20 tons per truck and, therefore, would require up to 100 trips per day and an average of 50 trips per day. Engineered fill may be mixed on-site using mobile equipment to ensure uniformity and meet specifications for compaction. Engineered fill would continue to be placed, graded, and compacted in a series of lifts to an elevation ranging between 2,520 and 2,570 means sea level (approximately 30 to 70 feet above ground surface). Fill slopes would be 3:1 (horizontal to vertical) or flatter (see Figure 3-14). Following completion of fill activities, the fill slopes would be revegetated to control erosion and ensure slope stability. The final grading would result in 37 acres of flat developable land on property zoned industrial.

Response to Comment Ind 331-11

The commenter asks what the hours of operation are for the project. Hours of operation for project activities are shown in Table 3-7 of the DEIR.

Response to Comment Ind 331-12

The commenter asks if the project will have night lighting. The project will have night lighting at the Brunswick Industrial Site. The commenter is referred to Section 4.1-3 of the DEIR.

Response to Comment Ind 331-13

The commenter is concerned about noise and dust from the project equipment. Noise from equipment operation is analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR. Dust emissions are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

Response to Comment Ind 331-14

The commenter asks how arsenic would be controlled from spreading via dust and wind. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Appendix E.1 of the DEIR regarding air emission modelling and health risk assessment including dust control methods, assumptions, and required mitigation measures. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring.

Response to Comment Ind 331-15

Please see Response to Comment Ind 331-14.

Response to Comment Ind 331-16

The commenter asks what OSHA and Nevada County Environmental Health regulations govern arsenic and asbestos dust from construction activities. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The Nevada County Environmental Health Department does not regulate arsenic or asbestos in dust. The action level for inorganic arsenic is 5 micrograms per cubic meter and permissible exposure limit under OSHA regulations

for inorganic arsenic is 10 micrograms per cubic meter. (29 CFR 1926.1018.) The time weighted average limit for asbestos is 0.1 fiber per cubic centimeter and excursion limit is 1 fiber per cubic centimeter under OSHA regulations for asbestos. (29 CFR 1926.1101.)

Individual Letter 332

14933 Pathan Pl.
Nevada City, CA 95959

February 24, 2022



Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley,

I'm a medical doctor, and have lived in Nevada County most of my life.

I oppose Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the DEIR, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Virtually any quantum of its emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

Ind 332-1

The air quality in California in general is already poor. According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region.

California's most air-polluted cities are also those most affected by our now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Nevada County is even more affected than the state. The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous."

Ind 332-2

Nevada County can't tolerate additional air pollution. That bears repeating: Nevada County can't tolerate additional air pollution.

Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. Current and future Nevada County children will absorb more of the mine's DPMs than today's adults do, both because of their more rapid respiratory rate and eight decades of exposure.

The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed

of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

Ind 332-3

The DEIR Table 4.3-19 estimates that maximum mitigated emissions of all reactive organic gases, oxides of nitrogen, carbon monoxide, oxides of sulfur, and particulate matter of 2.5 to 10 microns diameter will total 341 lb per day during the project's first four years, 332 lb daily during the next five years, and 293 lb during each day of the project's final sixty-nine years. That is, the DEIR estimates that despite all mitigations, however effective, the mining operation will release 8.5 million pounds--3900 metric tons--of pollutants known to be toxic into our community over the next eighty years. And this does not include emissions generated in post-mining reclamation.

Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers.

Ind 332-4

The DEIR specifies abundant mitigation requirements, as it should. But in practice, the mining industry in general has a record of neglecting or circumventing mitigations. The DEIR requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, Rise Gold won't need to use the environmentally cleanest engines if it's inconvenient.

Ind 332-5

That's only one mitigation out of a number larger than any public agency can monitor, enforce or, most importantly, afford. The history of mining, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community ruined and its taxpayers left to clean up the mess. Rise Gold's CEO's British Columbia Banks Island mine misadventure is a prime example of such irresponsibility.

Ind 332-6

Whatever benefits this project might bring to Nevada County, it is certain to damage our health. Our mortality rate from chronic lung disease is double the rate in California statewide: 69 versus 35 deaths per 100,000 people. Many of us are already at risk simply for our age. According to the 2020 census, one in three of us is 65 or older, compared to the statewide proportion of one in seven. Our heart disease mortality rate is half-again higher than statewide. In 2014 Sierra Nevada Memorial Hospital saw 369 adults and children for acute asthma and admitted 88, at cost of over $3 million, and that represents only one single illness. Mining emissions, featuring a wide assortment of irritants and carcinogens both known and unknown, will raise the incidence of local pulmonary and cardiac illnesses, with all their personal and financial costs.

Ind 332-7

The DEIR asserts that none of Rise Gold's operations, properly mitigated, will violate standards. Its repeated conclusions, "no significant impact," were written by people who won't live here the next

eighty years. As an avalanche of numbers, the DEIR can look like science, but as a trained scientist, I'm dubious. The data are based on estimates supplied by Rise Gold. Considering its environmental record and *misleading advertising, due diligence requires our skepticism. We should also recognize that* Federal, State, and county agencies' complex standards and thresholds for air quality do not exemplify science. They are useful and sensible, but necessarily arbitrary, and deliberately ignore varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor. And alarmingly, the DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years.

Ind 332-8

The DEIR's air quality section describes the effects of only this project, ignoring that its toxicities will add to the onerous burden the County already carries. Even if all its mitigation recommendations were enacted, *they won't reduce the project's air toxicities and greenhouse gases to zero.* Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,

Jeff Kane MD

INDIVIDUAL LETTER 332: JEFF KANE

Response to Comment Ind 332-1

This comment is introductory in nature and the commenter opposes the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the project's damage to air quality will be unmitigable but does not address the adequacy of the DEIR. The DEIR's analysis of air quality impacts included a health risk assessment and found air quality impacts to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The commenter is referred to Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 332-2

The commenter states that the project will expose Nevada County residents to dust, ozone, asbestos, silica, diesel particulate matter, GHGs, and noxious particulates and chemicals but does not specify how the DEIR is inadequate. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 332-3

The commenter references DEIR Table 4.3-19, which indicates the maximum mitigated daily project emissions per source and type of emission and states that the project will emit 8.5 million pounds of emissions over the course of the lifespan of the use permit. As shown in Table 1.3-19 and discussed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), the Northern Sierra Air Quality Management District (NSAQMD) has established thresholds of significance for ROG, NOx, and PM10. The project emissions of these constituents are not significant after mitigation and applicant proposed measures. There is no threshold established for the sum of all emissions as prepared by the commenter.

The commenter also states that the DEIR omits the GHG impacts of idling diesel engines by citing to the following in the DEIR: "starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." (DEIR, p. 4.3-95.) However, this same language is contained in the Air Quality and Greenhouse Emissions Analysis prepared by Dudek (DEIR, Appx. E.1., p. 45.) Starting and idling GHG emissions were included in the project's GHG emission estimates. DEIR page 4.3.95 discusses the exclusion of starting and idling GHG emissions from the calculation of emissions of off-site mobile source GHG emissions by air district. As stated in the DEIR, this information is provided only to facilitate full public disclosure and to present the magnitude of potential GHG emissions occurring within other air districts.

Response to Comment Ind 332-4

The commenter states that the mining industry in general either neglects or circumvents mitigation measures and implies that the Project Applicant will do the same. However, the commenter provides no evidence to substantiate this claim. The commenter specifically points to Mitigation Measure 4.3-1(b) as evidence that the Project Applicant will only use Tier 4 Final engines if

commercially available. However, the APM-AQ-1 (applicant proposed measure) would require all off-road diesel-fueled and emergency generators owned by the Project Applicant to be Tier 4 Final engines. (DEIR, p. 4.3-65.) Moreover, Mitigation Measure 4.3-1(b) requires the submission of a Construction Exhaust Emissions Minimization Plan in which the Project Applicant must demonstrate compliance with the Mitigation Measure. The Mitigation Measure is also enforceable by the County. Regarding the assertion that the Project Applicant would not follow mitigation measures, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 332-5

The commenter questions whether mitigation measures can be enforced by the County and provides an opinion of the Project Applicant's character. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 332-6

The commenter states that any benefit of the project is outweighed by impacts to air quality but does not state how the DEIR is inadequate. Please see Master Response 1.

Response to Comment Ind 332-7

The commenter claims that the DEIR is based on estimates supplied by Rise Gold. The DEIR was prepared by Nevada County and all Project Applicant-supplied technical reports were peer reviewed by the County's third-party consultants. Thresholds of significance and project impacts are thoroughly discussed in the DEIR. In regard to the commenter's opinion on the Project Applicant's reputation, the commenter is referred to Master Response 3 – Operator Responsibility. The DEIR takes into account the air quality effects of the project on Nevada County residents, including children. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 332-8

The commenter reiterates concerns regarding the project's air quality impacts and opposes the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. There is no requirement to reduce emissions, including greenhouse gases to zero. Please see Master Response 27 – Greenhouse Gas Thresholds.

Individual Letter 333

From: Jeff Kane
To: BOS Public Comment
Subject: Letter to Supervisors on IMM DEIR attached
Date: Monday, February 28, 2022 2:41:21 PM
Attachments: DEIR comments.doc

Dist 1

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Please see attached

February 28, 2022

To: Nevada County Planning Dept. & Supervisors
Re: Comments on Idaho-Maryland Mine DEIR

From: Jeff Kane MD
14933 Pathan Pl.
Nevada City, CA 95959
530-265-0478

Dear Supervisor:

I'm a medical doctor, and have lived in Nevada County most of my life.

I urge you to reject Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the Draft Environmental Impact Report, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Its least emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

The air quality in California in general is already poor.
According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region. California's most air-polluted cities are also those most affected by now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Ind 333-1

Nevada County is even more affected than the state.
The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous." Nevada County can't tolerate additional air pollution.

The mine will emit massive amounts of numerous respiratory toxins
Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

Ind 333-2

Even optimally mitigated, the mine's toxic airborne emissions will be massive.

The DEIR Table 4.3-19 estimates that maximum mitigated emissions of all reactive organic gases, oxides of nitrogen, carbon monoxide, oxides of sulfur, and particulate matter of 2.5 to 10 microns diameter will total 341 lb per day during the project's first four years, 332 lb daily during the next five years, and 293 lb during each day of the project's final sixty-nine years. That is, the DEIR estimates that despite all mitigations, however effective, the mining operation will release 8.5 million pounds--3900 metric tons--of pollutants known to be toxic into our community over the next eighty years. And this does not include emissions generated in post-mining reclamation.

Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers and other industrial engines.

Ind 333-3

The mining industry in general and Rise Gold in particular has a record of neglecting or circumventing mitigations.

The DEIR specifies abundant mitigation requirements, as it should. The Report requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, if Rise Gold finds it inconvenient, it won't need to deploy the environmentally cleanest engines.

Ind 333-4

The DEIR specifies more mitigation requirements than Nevada County can monitor, enforce or, most importantly, afford.

Mining's history, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community damaged and its taxpayers left to clean up the mess. The British Columbia government halted Rise Gold's CEO's previous endeavor, the Banks Island mine, and prosecuted and fined him for gross environmental irresponsibility.

Ind 333-5

Whatever benefits this project might bring to Nevada County, it is certain to damage our health.

Our mortality rate from chronic lung disease is double the rate in California statewide: 69 versus 35 deaths per 100,000 people. Many of us are already at risk simply for our age. According to the 2020 census, one in three of us is 65 or older, compared to the statewide proportion of one in seven. Our heart disease mortality rate is half-again higher than statewide. In 2014 Sierra Nevada Memorial Hospital saw 369 adults and children for acute asthma and admitted 88, at cost of over $3 million, and that represents only one single illness. Mining emissions, featuring a wide assortment of irritants and carcinogens both known and unknown, will raise the incidence of local pulmonary and cardiac illnesses, with all their personal and financial costs.

Ind 333-6

The mine's toxic airborne emissions will especially impair children's health.

The DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years. Current and future Nevada County children will absorb more of the mine's DPMs than adults do, both because of their more rapid respiratory rate and eight decades of exposure.

Ind 333-7

The DEIR's assertions of "no significant impact" come from dubious data and arbitrary standards.
Its data are based on figures supplied by Rise Gold. Considering this company's environmental record and misleading advertising, due diligence requires our skepticism. Further, federal, state, and county agencies' complex standards and thresholds for air quality, while useful and sensible, are necessarily arbitrary and impermanent. (For example, in 2007 The Mining Safety and Health Administration reduced the permissible ambient DPM concentration from 350 to 160 micrograms per cubic meter.) In any case these objective standards deliberately ignore unmeasurable varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor.

Ind 333-8

The DEIR's air quality section describes the effects of only this project, ignoring the fact that they add to our already onerous burden.
Even if all its mitigation recommendations were enacted, the mine is certain to worsen our air quality even further, and add to illness incidence. Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,

INDIVIDUAL LETTER 333: JEFF KANE

Response to Comment Ind 333-1
This comment is substantially similar to Comments Ind 332-1 and 332-2. The commenter is referred to Responses to Comments Ind 332-1 and Ind 332-2.

Response to Comment Ind 333-2
This comment is substantially similar to Comment Ind 332-3. The commenter is referred to Response to Comment Ind 332-3.

Response to Comment Ind 333-3
This comment is substantially similar to Comment Ind 332-4. The commenter is referred to Response to Comment Ind 332-4.

Response to Comment Ind 333-4
This comment is substantially similar to Comment Ind 332-5. The commenter is referred to Response to Comment Ind 332-5.

Response to Comment Ind 333-5
This comment is substantially similar to Comment Ind 332-6. The commenter is referred to Response to Comment Ind 332-6.

Response to Comment Ind 333-6
The commenter states that the DEIR fails to consider the project's air quality impact with regard to children. The DEIR's Health Risk Assessment did analyze the project's air quality impacts to children. (DEIR, p. 4.3-61–63.) The commenter is also referred DEIR, Appendix E.1. (Health Risk Assessment), page 357.

Response to Comment Ind 333-7
This comment is substantially similar to Comment Ind 332-7. The commenter is referred to Response to Comment Ind 332-7.

Response to Comment Ind 333-8
This comment is substantially similar to Comment Ind 332-8. The commenter is referred to Response to Comment Ind 332-8.

Individual Letter 334

14933 Pathan Pl.
Nevada City, CA 95959

February 24, 2022



Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley,

I'm a medical doctor, and have lived in Nevada County most of my life.

I oppose Rise Gold Corporation's proposal to re-open the Idaho-Maryland mine because it will irreparably damage our community in many ways. For the purpose of addressing the DEIR, I'll limit these comments to its effects on our air quality.

The mine's damage to our air quality is, frankly, unmitigatable. Virtually any quantum of its emissions will raise Nevada County's incidence of illness and death despite any mitigation, as I'll explain.

The air quality in California in general is already poor. According to the American Lung Association, the five cities in the country with the worst annual particulate pollution and highest ozone levels are in California, and include the Sacramento-Roseville region.

Ind 334-1

California's most air-polluted cities are also those most affected by our now-endemic wildfires, which severely aggravate monthly and annual air pollution averages. With its warmer and drier conditions, ongoing climate change intensifies wildfires, so worsens California's air quality and the consequent health effects.

Nevada County is even more affected than the state. The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy." Our county has long been considered "Sacramento's tailpipe," as auto exhaust emitted there funnels here. And during the past two summers, wildfires contributed to entire weeks which the Northern Sierra Air Quality Management District labeled "very hazardous."

<u>Nevada County can't tolerate additional air pollution. That bears repeating: Nevada County can't tolerate additional air pollution.</u>

Airborne elements from the mine will include dust, ozone, and noxious particulates and chemicals, not to mention considerable greenhouse gases. The project will emit copious diesel particulate matter (DPM), of which most is small enough to readily enter human lungs. Current and future Nevada County children will absorb more of the mine's DPMs than today's adults do, both because of their more rapid respiratory rate and eight decades of exposure.

The particles we'll all inhale include asbestos, silica, and various heavy metals. DPM is also composed

of numerous organic compounds, including more than forty known cancer-causing substances like polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. The California Air Resources Board has classified DPMs as a Toxic Air Contaminant. The CARB estimates that about 70% of the cancer risk that the average Californian faces stems from these diesel exhaust particles.

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Nor does it include emissions from idling diesel engines. In its Air Quality report of 2020, the DUDEK Corporation estimated (p. 135) that the project's diesel idling would amount to 200,000 minutes annually. The DEIR, though, explicitly omits the effects of idling (p. 4.3-95): "Starting and idling emissions, which are minor, are excluded because the focus is on the Vehicle Miles Traveled rather than the ultimate origin and/or destination of each trip." We've all heard and smelled diesel delivery trucks as they idle; imagine the same from a fleet of twenty-ton haulers.

The DEIR specifies abundant mitigation requirements, as it should. But in practice, the mining industry in general has a record of neglecting or circumventing mitigations. The DEIR requires, for example, that the operation must utilize environmental state-of-the-art "Tier 4" diesel engines "...if commercially available," meaning that if they're unavailable for some reason (for example, p. 4.3-78: "...taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites"), dirtier engines will suffice. In practicality, Rise Gold won't need to use the environmentally cleanest engines if it's inconvenient.

That's only one mitigation out of a number larger than any public agency can monitor, enforce or, most importantly, afford. The history of mining, especially in Nevada County, indicates that mitigation measures are generally underfunded, poorly enacted, and often virtually ignored, leaving the local community ruined and its taxpayers left to clean up the mess. Rise Gold's CEO's British Columbia Banks Island mine misadventure is a prime example of such irresponsibility.

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The DEIR asserts that none of Rise Gold's operations, properly mitigated, will violate standards. Its repeated conclusions, "no significant impact," were written by people who won't live here the next

eighty years. As an avalanche of numbers, the DEIR can look like science, but as a trained scientist, I'm dubious. The data are based on estimates supplied by Rise Gold. Considering its environmental record and misleading advertising, due diligence requires our skepticism. We should also recognize that Federal, State, and county agencies' complex standards and thresholds for air quality do not exemplify science. They are useful and sensible, but necessarily arbitrary, and deliberately ignore varieties of human experience like anxiety, irritation, aesthetics, and sensitivity to noise and odor. And alarmingly, the DEIR does not take into account air quality effects on the thousands of voiceless Nevada County residents who will be born during the next eighty years.

The DEIR's air quality section describes the effects of only this project, ignoring that its toxicities will add to the onerous burden the County already carries. Even if all its mitigation recommendations were enacted, they won't reduce the project's air toxicities and greenhouse gases to zero. Again, Nevada County can't tolerate additional air pollution.

Considering the proposal's predictable injuries to Nevada County's health, beauty, economics, and well-being, no one who values our community can claim it has redeeming value. I urge Nevada County's Planning Department and Supervisors to find the DEIR unacceptable, and to reject the proposal.

Respectfully,

Jeff Kane MD

INDIVIDUAL LETTER 334: JEFF KANE

Response to Comment Ind 334-1

This letter is identical to Individual Letter332: Jeff Kane. The commenter is referred to Responses to Comments Ind 332-1 through Ind 332-8.

Individual Letter 335

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner 950 Maidu Ave, Suite 170 Nevada City, CA 95959
Ph: 530 265-1423

Email: matt.kelley@co.nevada.ca.us
DEIR Comment Email: idaho.mmeir@co.nevada.ca.us

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

Dear Friends,

I think the Draft Environmental Impact Report of the Idaho-Maryland Mine Project is a good indicator of this company should not be trusted, as the true negative impacts of the project have been severely understated. Let's go back just a short time ago, to 1993.

In June of 1993, the Nevada County Planning Commission certified the environmental impact report and permit for the San Juan Ridge mine.

Ind 335-1

Riki Colby opens the tap and out pours brown water, filled with toxic minerals. "I got kidney pain, I had intestinal problems, I had insomnia." The San Juan Gold Mine was reopened despite concerns from the community, and CEO Tim Callaway gave every assurance to the community and to the county that their operation would be safe, and it would not impact nearby residents. They were wrong, and they poisoned our fellow citizens after their operation ran into major problems in 1995. By 1997 the company's stock price had cut in half, and the mine folded. Once Tim Callaway abandoned the mine and shut off the water pumps, the mine refilled with toxic water, which leached into many wells in the area and into the homes of our community. The well water is still undrinkable for nearby residents because of manganese, iron, and dissolved sulfates. For all intensive purposes, the community had been poisoned. We paid the price, the company left us with an environmental disaster that leached into the Yuba, and all we have to show for it is the bitter test of toxic water and the unfulfilled promises of a gold miner.

https://vimeo.com/111603225

Please watch the film. I am including it as supporting evidence in my submission.

Water testing was done at Grizzly Hill school, and indeed, they children's water was contaminated far beyond any allowable health standards.

	Acceptable Amount	Amount Found
Iron	300 ppb	40,200 ppb
Manganese	50 ppb	8,130 ppb
Nickel	100 ppb	726 ppb
Aluminum	1000 ppb	2,700 ppb

If we cannot learn from our own history, right here in our own county, then we have no right to be authorized to make these decisions.

Ind 335-2

Now, in the DEIR, they say they will be discharging effluent from the mining site into our Wolf Creek. They do not say what chemicals will be included in that effluent, and this reflects either insufficient testing, or withholding the dangerous information that is likely to become known. Observing the test results from the San Juan Mine, Iron, Manganese, Nickel, and Aluminum would be poured into our waterways for an unpredicted amount of time. Let's also observe the chemicals that are leached from the explosives, Ammonium Nitrate. The DEIR is extremely deficient in its analysis of chemicals that will be leached from the mine waste and dumped into our rivers as effluent.

Ammonium Nitrate is not something you want to consume, so why would we put it into our drinking water or our irrigation water? What flows into Wolf Creek, flows into the Bear River, and from the Bear River, about 42,000 acres of farmland get their irrigation water. Furthermore, with the Centennial water supply pipeline, a huge volume of that water will be sent to Lincoln, Roseville, and North Sacramento. Let us not forget the groundwater recharge that takes place all along those corridors between Wolf Creek and the Bear River. A true analysis of the number of wells within recharge proximity of the entire downstream watershed has not been done, and proves how deficient this DEIR is.

Furthermore, Ammonium Nitrate has been shown to cause death in tadpoles, frogs and toads, just like our endangered Yellow Legged Frog.

https://link.springer.com/article/10.1007/s002449900188

Lethal and Sublethal Effects of Nitrogen Fertilizer Ammonium Nitrate on Common Toad (*Bufo bufo*) Tadpoles

Here is another study published in the Journal of Environmental Toxicology and Chemistry, who also demonstrated chronic toxicity from Ammonium Nitrate.

https://setac.onlinelibrary.wiley.com/doi/abs/10.1002/etc.5620141217

Acute and chronic toxicity of ammonium nitrate fertilizer to amphibians from southern ontario

And here is a third study, The effect of ammonium nitrate fertiliser on frog (*Rana temporaria*) survival

https://www.sciencedirect.com/science/article/abs/pii/S016788099601095X

This demonstrates just how toxic are the materials that the mine will be using and dumping into our rivers, our streams, our farmland, and potentially our drinking water. The insufficient explanation of water treatment and expected toxin levels within the effluent illustrates the DEIR is dangerously inadequate.

We love living in this community because it is rebounding from its mining days. Yes mining has left our rivers poisoned with mercury, our fish too dangerous to eat in quantity, and we even endanger our kids and pregnant wives with the latent mercury from one or fish too many, but we live with that threat. We don't need to make it worse. We don't need to ruin our quality of life by turning a beautiful forest into a toxic industrial wasteland poising our community and waterways. Thank you for your time.

~ Jeff Litton

INDIVIDUAL LETTER 335: JEFF LITTON

Response to Comment Ind 335-1

The commenter states that the DEIR should not be trusted, asserts that the impacts have been understated, and then cites the San Juan Ridge Mine as an example of water contamination caused by a mining operation. Contrary to the commenter's assertion that the DEIR was prepared by the applicant to underestimate impacts, the DEIR was prepared by County's independent EIR consultant and technical studies submitted by the applicant have been peer reviewed by the County's own independent technical experts. With regard to the comparison between the San Juan Ridge mine and the project, these are separate projects, and the project's water quality impacts have been analyzed in the DEIR and found to be less than significant after mitigation. The DEIR's conclusions regarding water quality were also peer reviewed by the County's independent experts, who concurred with the analysis and conclusions.

Response to Comment Ind 335-2

The commenter asserts that the DEIR does not disclose what chemicals will be in the water discharged to South Fork Wolf Creek and that the project could result in ammonium nitrate pollution. The constituents and requirements for the mine water discharge are discussed in detail and analyzed in the DEIR. Please see Master Response 35 – Discharge to South Fork Wolf Creek. An analysis of the number of wells within recharge proximity of the entire downstream watershed is not required as the water discharge will be required to meet all water quality goals.

As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Individual Letter 336

From: Jeff Peach
To: Idaho MMEIR
Subject: All about the water
Date: Saturday, February 12, 2022 6:48:00 PM

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Ind 336-1

I am really surprised that the mine is even considered. It's all about the water, IMHO. There may be researchers that say the water table won't be affected... If they are wrong, we will be in a worse situation than we already are. Water is becoming a scarce commodity in California and we are going to allow a mining company to come in and pump millions of gallons of water out of the mine? Seems counter intuitive to me.

--
Jeff Peach

We don't stop playing because we grow old, we grow old because we stop playing...

http://www.threetimesthrough.com
http://www.facebook.com/threetimesthrough
https://www.youtube.com/user/ThreeTimesThrough
https://www.instagram.com/threetimesthrough/

INDIVIDUAL LETTER 336: JEFF PEACH

Response to Comment Ind 336-1

Please see Master Responses 13, 14, 15, and 16.

Individual Letter 337

From: Jeff Russell
To: Idaho MMEIR
Subject: Idaho Maryland mine DEIR
Date: Monday, April 4, 2022 4:26:40 PM

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Mr. Matt Kelley
Senior Planner

Ind 337-1 I have opposed the reopening of the Idaho Maryland mine for the more than 30 years I have lived in Nevada County. Listening to the many comments made at the public meeting on March 24th only served to convince me more what a very bad idea for everyone in the area excepting the owners and stock holders of Rise Gold.

Ind 337-2 Personally, I live right above Bennett Meadow. Walking along the stream (South Fork of Wolf Creek) that would be continuous flooded just makes me sad!
A decision to move forward will do irrevocable damage to the entire ecology of the western Nevada County and the health of all of us.

Ind 337-3 There is no good reason to reopen this mine and dredge up all the heavy metals and contaminants sleeping therein! With a lot less effort and with very little consequences, the few jobs that Nevada county residents would glean from the reopening could be generated in more productive and less harmful ways; let's put our efforts there. Not on the travesty we are now facing for the third time. Protect our air, our land, our streams and our people, children and adults alike.

Sincerely, Jefrey Russell
10728 Footwall Dr. 95945
530-277-8021

INDIVIDUAL LETTER 337: JEFF RUSSELL

Response to Comment Ind 337-1

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 337-2

Please see the analysis under Impact 4.8-3, which starts on page 4.8-69 of the DEIR. As detailed therein, the proposed project would be subject to the requirements set forth in Mitigation Measure 4.8-3, ensuring that the Project Applicant submits a Final Drainage Report to the Nevada County Planning Department for review and approval that demonstrates the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development conditions will not exceed pre-development levels in the downstream channel(s) during design storm events. With incorporation of Mitigation Measure 4.8-3, the DEIR concludes that potential impacts related to on- or off-site flooding would be less than significant.

Response to Comment Ind 337-3

Please see Master Responses 1, and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 338

From: J M
To: Idaho MMEIR; Planning
Subject: comment on Idaho Maryland mine
Date: Wednesday, March 16, 2022 11:36:45 AM

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I'm writing to oppose the opening of the Idaho Maryland mine.

Others have addressed many details and reasons, so at this time, I'd simply like to point out that the draft Environmental Impact Report (dated December, 2021) is couched to present the mine project as feasible. Throughout, the tone and content work from the underlying assumption that the project is worthwhile, so we all need to figure out how to bring it to fruition. In other words, there is bias. Indeed, the second paragraph of the introduction clarifies that the purpose of the EIR is to inform the public but then to point out ways to minimize adverse environmental effects and offer alternatives to reduce those effects.

Ind 338-1

Ind 338-2 Nowhere does the EIR consider the alternative of denying approval to the project. I regard the EIR as misleading in that it encourages the reader to regard any problems as susceptible to

Ind 338-3 adjusting to what the report disingenuously suggests is nothing more than a somewhat new situation.

I therefore implore the members of the Planning Commission to study the EIR with a view

Ind 338-4 toward making independent evaluations of the various impacts it describes. To mention just one example, I point out the many comments, tables and descriptions regarding truck traffic and noise. Throughout, the finding is that there will be more traffic, more noise, and more damage to roads, but the conclusion is that we can all live with that. I disagree.

The broad question is this: why should we endure the sacrifices described in the EIR and elucidated elsewhere so that Rise Gold (a company of questionable integrity) can profit?

Ind 338-5 I am a sixth-generation resident of the Grass Valley/Nevada City area, a descendant of the men who owned and ran the North Star during the 1860s. Their day is done. Let's chart a twenty-first century course of action that respects and values our community.

Jeffrey Mason

INDIVIDUAL LETTER 338: JEFFREY MASON

Response to Comment Ind 338-1

Please see Master Response 1.

As discussed on page 1-1 of the DEIR, pursuant to CEQA Guidelines Section 15121, the purpose of the DEIR is to a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

As part of assessing potential project impacts that could occur to all environmental issue areas required for analysis under CEQA, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate, meets the requirements set forth by the CEQA Guidelines, and is not biased.

Response to Comment Ind 338-2

The purpose of a DEIR is not to approve or deny a project. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Response to Comment Ind 338-3

The comment expresses a general opinion that the DEIR is misleading, but does not provide specific examples that would allow for a detailed response. Please see Response to Comment Ind 338-1.

Response to Comment Ind 338-4

A rise in the levels of truck traffic and noise, relative to existing levels, that could occur through approval of the proposed project does not, in itself, constitute a significant impact. The determination of a potential impact associated with increases in truck traffic and noise would be considered significant is based on applicable thresholds, which are detailed in Chapter 4.10, Noise and Vibration, and Chapter 4.12, Transportation, of the DEIR. For example, the DEIR includes analysis of potential impacts associated with short-term increases in ambient noise levels under Impact 4.10-1, which starts on page 4.10-27. Table 4.10-11 includes applicable noise level thresholds and discloses the receptor locations at which noise generated by project construction activities would exceed such thresholds. Because exceedance of the applicable thresholds could occur, the DEIR sets forth Mitigation Measure 4.10-1 on page 4.10-30, which requires that the project incorporate noise reduction measures during construction of the potable water line along East Bennett Road. However, because the noise reductions that would be achieved by the measures cannot be definitively determined to confirm that noise levels would be reduced to below a level of significance, the DEIR discloses that the impact is considered significant and unavoidable for the purposes of CEQA evaluation. In its role as the lead agency, the County of

Nevada will weigh the overall merits of the project against the impacts identified in the DEIR as part of determining whether the County should approve the project.

Response to Comment Ind 338-5

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 339

Jennifer Buck-Diaz
505 Long Street
Nevada City, CA 95959
Email: jenderbucket@gmail.com

April 3, 2022

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Mr. Matt Kelley, Senior Planner
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

Ind 339-1 I am a Nevada County resident and have lived in the Grass Valley/Nevada City area since 2008. My husband and I purchased our home in 2010 and are raising our two young children here because we enjoy the natural beauty, open space, and ecology of the region.

Ind 339-2 I appreciate the opportunity to provide a comment on the Draft Environmental Impact Report (DEIR) released by Nevada County, which addresses the environmental impacts of re-opening and operating the proposed Idaho-Maryland Mine. As a professional vegetation ecologist with over 20 years of botanical experience, I am concerned about impacts of the mine project on native plants of our region. The environmental analysis of the DEIR is inadequate, and the impacts of this large-scale gold mining project will be significant and unavoidable.

Ind 339-3 The proposed project will significantly affect local groundwater resources by dewatering the Mine and lowering groundwater levels. This will have a direct impact on a very rare plant species (*Juncus digitatus*) located less than 2 miles away from the proposed mine site at the intersection of Idaho-Maryland Road and Brunswick Avenue. This species has only 3 occurrences in the world and is completely dependent on freshwater seeps and springs
(see: https://rareplants.cnps.org/Plants/Details/3355, and
https://rareplants.cnps.org/Uploads/ReferenceDocs/JuncusDigitatus_20090102_StsRevAdd.pdf)

Ind 339-4 The DEIR does not provide a comprehensive analysis to determine the extent and the severity of the impacts upon groundwater resources and wells. Without this analysis, the DEIR must identify such impacts as significant and unavoidable. The DEIR lacks an accurate project description, lacks data and analyses needed to make informed determinations, and fails to provide effective and feasible mitigation measures. For these reasons, the document is inadequate under CEQA. The DEIR should be revised and recirculated to comply with CEQA.

Ind 339-5 Thank you for your time and consideration.

Sincerely,

Jennifer Buck-Diaz
Vegetation Ecologist, Nevada County Resident

INDIVIDUAL LETTER 339: JENNIFER BUCK-DIAZ

Response to Comment Ind 339-1
The comment does not address the adequacy of the DEIR.

Response to Comment Ind 339-2
The commenter expresses general concerns regarding the project and the adequacy of the DEIR, but does not provide specific detail regarding the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative issues. With regard to native plants, please see Master Responses 30 and 31.

Response to Comment Ind 339-3
Please see Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 339-4
Please see Master Responses 13, 14, and 15.

Response to Comment Ind 339-5
The project, as proposed, is detailed in Chapter 3, Project Description, of the DEIR. As part of assessing potential project impacts that could occur to all environmental issue areas required for analysis under CEQA, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. Where potential impacts would remain significant, even with the incorporation of mitigation, such impacts are concluded within the DEIR to be significant and unavoidable. Table 2-1, which starts on page 2-10 of the DEIR, summarizes all potential impacts evaluated in the DEIR and discloses the potential impacts that would remain significant and unavoidable. The analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. The commenter does not provide specific information related to the asserted inadequacies; therefore, a detailed response cannot be provided.

Individual Letter 340

From: Jennifer W. Burt <jenniferwburt@gmail.com>
Sent: Monday, April 4, 2022 5:06 PM
To: Matt Kelley; Idaho MMEIR
Subject: I-M Mine DEIR comments

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Dr. Jennifer Burt

Loma Rica Drive
Grass Valley, CA 95945
Email: jenniferwburt@gmail.com

April 4, 2022

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959
Email: matt.kelley@co.nevada.ca.us; Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly:

Ind 340-1 I am a Nevada County resident and well-owner in the immediate vicinity of the proposed Idaho-Maryland Mine project. We moved here 10 years ago to raise our children, because we were drawn to the the natural beauty, open space, and ecology of the region, in addition to the local neighborhood draw of pristine well water, the ability to farm on our land, and the quiet ambiance of our neighborhood. Additionally, I am an ecologist by training and career, and have over 20 years of environmental consulting experience and hold M.S. and Ph.D. degrees in ecology.

Ind 340-2 It is hard to know where to begin on the extremely insufficient analyses presented in the Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project, and I find I did not leave myself enough time to be thorough. I submitted a letter to the County during the scoping process requesting that detailed analysis of specific project impacts be carried out, with independent peer-review by topic experts, given the wide and long-term scope and expected negative impacts of this project. These requests were far from met. It is exceedingly clear that this project would create great and lasting harm to the Grass Valley community and our environment, even to Western Nevada County as a whole, yet the DEIR declares most impacts to be less than significant. The analyses and proposed mitigation measures that impact assessments were based on are both inadequate and apparently intentionally misleading.

Ind 340-3 The project would have significant aesthetic impacts, including impacts to night sky visibility, scenic vista impacts, and aesthetic impacts of operating an industrial scale mine right in the center of a beautiful rural community that is a tourist destination due to its rural character and charm.

Nevada County already suffers from very poor air quality, and a high rate of lung disease. Fugitive dust and asbestos emissions from the mine operations will worsen this problem. Asbestos was not adequately considered. I agree with the comments made by the CEA letter on this topic.

Ind 340-4 The project did not conduct an adequately detailed and peer-reviewed analysis of how subsurface mining activities within the area may affect potential for increasing local seismic activity and decreasing surface geological stability, as well as potential to affect the structure and function of local groundwater aquifers.

Ind 340-5 The analysis of hazards and hazardous materials was grossly inadequate. The assumption that mine tailings would be saleable should not be assumed for project analysis.

Ind 340-6 I am also in agreement with the points made by the Community Environmental Advocates letter and the Wells Coalition on the insufficiency of the DEIR analysis of groundwater quality and wells impacts. The groundwater modeling analysis does not consider an adequate baseline dataset, neither spatially nor temporally, and should be including many more wells, a larger spatial area, and include a wide range of current water years and months including during prolonged droughts, which are increasingly common. In essence, at least 10 years of baseline data should be required to be collected and analyzed, and modeling improved based on additional data to ensure no significant effects, before the project should be allowed to commence dewatering.

Ind 340-7 The wells monitoring plan does not include a sufficiently wide region around the groundwater effects area to capture potential project effects on depth to groundwater and groundwater quality. It makes an assumption that the over simplistic model has identified the full spatial range of potential project effects and then sets out a plan to conduct monitoring in that same area, which assumes the simplistic model in a complex fractured bedrock groundwater aquifer is correct. This is incredibly circular reasoning and completely inappropriate for a project of this size and scope.

Ind 340-8 The onus of collecting sufficient baseline groundwater/well operation data and ongoing interim- and post-project data to prove that the project is not significantly affecting nearby wells or water quality should be Rise Gold's responsibility, and financial assurances for all mitigation and monitoring should be ensured to the County and its taxpayers, that would remain in place even after the nearly inevitable bankruptcy filing by this mine.

Ind 340-9 Detailed monitoring should occur prior to and during project operation for an area at least five miles out from the mineral rights boundary and thus the potential extent of project-associated groundwater pumping operations over the course of the project.

Ind 340-10 Rise Gold intends to mitigate for well effects by piping water to a small number of homes. It has already been established by many experts weighing in on the analysis conducted that many more wells are likely to be significantly affected by the project than these that have been identified by a simplistic model based on a small number of data points and water years. But furthermore, it should be said that providing piped NID water to homes whose wells are affected by the project does not even fully mitigate for loss of well water availability or well water quality, because NID fees are high, and baseline water quality of NID water is lower than the water obtained via local wells currently.

Ind 340-11 Groundwater dependent ecosystems and sensitive species associated with these are likely to be affected by groundwater drawdown due to the project as well. Insufficient analysis of groundwater dependent ecosystems

Ind 340-12 Noise impacts of the project would cause stress and health impacts to the human and wildlife populations in the region. This was not adequately analyzed or addressed.

Ind 340-13 If the project goes forward, quality of life will be decreased for the entire community due to ongoing noise, reductions in air quality, increased traffic, decreased aesthetics, decreased water quality, well impacts, and etc. People who have the ability to do so will move away. Property values and associated property taxes going to the County will plummet. Small businesses will shutter. These impacts were not sufficiently addressed in the DEIR.

Ind 340-14 County taxpayers will end up footing the bill for all the road and traffic control improvements that will be needed if this project moves forward.



Ind 340-15

The project would require more electrical grid capacity than is available, and its energy use would reverse all climate change mitigation that the County and region might be able to achieve if the project did not occur.

In summary, this project DEIR is inadequate and should not be approved.

Thank you for your time and consideration.

Sincerely,

Jennifer W. Burt, PhD
Ecologist, Nevada County Resident

3

INDIVIDUAL LETTER 340: JENNIFER BURT

Response to Comment Ind 340-1
Comment noted.

Response to Comment Ind 340-2
The commenter states that the DEIR is inadequate and intentionally misleading but provides no specifics or evidence. Therefore, a specific response is not possible. Comment noted.

Response to Comment Ind 340-3
The analysis in the DEIR determined the project will have a significant and unavoidable aesthetics impact due to substantially degrading the existing visual character or quality of public views of the project sites or site surroundings, or conflict with applicable zoning and other regulations governing scenic quality. However, the DEIR determined that the project will have a less than significant impact on scenic vistas and would not create a new source of substantial light or glare which would adversely affect day of nighttime views in the area (see DEIR Impact 4.1-3).

Regarding air quality and asbestos: Please see Chpater 4.3 of the DEIR, Master Response 18 - Air Quality Thresholds, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 22 - Conservatism of Asbestos Assumptions. Additionally, please see the response to the referenced CEA comment letter (Group Letters 7 and 8).

Response to Comment Ind 340-4
The project would not increase seismic activity, decrease geological stability, or the structure of the aquifer. Please see Chapter 4.6 of the DEIR, the NV5 memo attached to the FEIR as Appendix P, and Response to Comment Ind 248-13.

Project impacts to groundwater have been extensively analyzed in the DEIR. Please see Chapter 4.8 of the DEIR, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 340-5
The commenter states the DEIR analysis of hazards and hazardous materials is grossly inadequate but provides no further information. Therefore, a further response is not possible.

Please see Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 340-6
The commenter asserts that the groundwater model analysis does not consider an adequate baseline dataset and requests that the project monitor water levels for 10 years before commencing dewatering. With regard to the data used of the groundwater model, please see Chapter 4.8 of the DEIR and Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. The commenter does not provide a justification for the need for 10 years of baseline data and such extensive baseline data is not required to adequately assess the project's groundwater impacts.

Response to Comment Ind 340-7

The commenter asserts that the groundwater monitoring should cover a larger area but does not explain why. The groundwater impact analysis and groundwater well monitoring plan were reviewed by the County's independent experts, who concurred with the impact conclusions and required mitigation, including the geographic scope of the monitoring area. Please see Chapter 4.8 of the DEIR and Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 340-8

The applicant is already required to collect baseline well monitoring data and collect water level data throughout the project operations and is responsible for costs of well mitigation. Please see Mitigation Measures 4.8-2(a), 4.8-2(b), and 4.8-2(c) in the DEIR. Any financial assurances required for the mine are the responsibility of the mine operator.

Response to Comment Ind 340-9

The commenter states that the groundwater should be completed for an area of 5 miles from the mineral rights boundary but provides no evidence why an arbitrary 5 miles from this boundary line is required. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 340-10

The commenter states that many experts conclude that many more wells than those discussed in the DEIR would be significantly affected by the project but provides no evidence of these expert conclusions. Please see Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The Well Mitigation Plan requires compensation for water charges. Please see Appendix K.9 of the DEIR.

The commenter states that water quality of NID potable water is lower than the water quality from domestic water wells, but provides no evidence to support this statement. Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See NID water quality report at: https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf.

Response to Comment Ind 340-11

Please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 340-12

Noise impacts to people have been evaluated in Chapter 4.10 of the DEIR and, except for construction of the water pipeline, have been found to be less than significant after mitigation. Noise impacts to wildlife is analyzed in the DEIR (see page 4.4-74 of the DEIR).

Response to Comment Ind 340-13

The commenter states that certain impacts were not sufficiently addressed in the DEIR, but provides no evidence to support these claims. Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. Air quality impacts, traffic impacts, aesthetic impacts, water quality impacts and water supply impacts were all analyzed in the DEIR in Chapters 4.3, 4.12, 4.1, and 4.8, respectively.

Response to Comment Ind 340-14

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

The applicant is also required to pay traffic improvement fees and fair share payments for various traffic improvements, including intersections. Please see Chapter 4.12 of the DEIR.

Response to Comment Ind 340-15

PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. The proposed project would not require or result in the relocation or construction of new electric power facilities. Please see page 4.11-35 of the DEIR.

Please also see Master Response 27 - Greenhouse Gas Thresholds, and Master Response 25 - Nevada County Energy Action Plan.

Individual Letter 341

Ind 341-1

DO NOT !!
I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

NO mine!

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JENNIFER DALMAU
Address 16425 COLFAX HIGHWAY GV ZIP 95945
Phone 530-205-8986
Email Address KARMENSGARDEN@GMAIL.COM

INDIVIDUAL LETTER 341: JENNIFER DALMAU

Response to Comment Ind 341-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 342

From: Jennifer Iams-McGuire
To: bdofsupervisors
Subject: no mine
Date: Friday, February 18, 2022 9:15:30 AM

Dist 4

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Dear Board of Supervisors,

Ind 342-1

I am writing to contribute my voice to the thousands of local residents like myself who absolutely DO NOT support the opening of the Idaho-Maryland mine. When will we prioritize the health and well-being of the land, our environment, and the local residents versus the profits of a few? You have the opportunity to be truly forward thinking leaders, to end the legacy of toxic exploitation of our home. The benefits of re-opening the mine are insignificant compared to the less-addressed problems it will create.

Ind 342-2

Besides, what is the hurry? Why is our community scrambling to accommodate the desires of non-local interests when our long-term relationship with mining - past and future- has barely been addressed? If there is gold and profit to be extracted, it will still be there, years ahead, new decisions can be made when technology advances and values of self-preservation are prioritized. This is a watershed moment to make the right choice about our watershed! Poisoning our environment is not the right choice. Thank you for choosing long-term well-being and not accepting the smoke and mirrors "benefits" of a sketchy out of area self-serving corporation that cares nothing about our community. Don't get duped!

Thank you,

Jennifer Iams-McGuire

13222 Hidden Valley Rd.
Grass Valley, CA 95949

INDIVIDUAL LETTER 342: JENNIFER IAMS-MCGUIRE

Response to Comment Ind 342-1

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 342-2

Please see Master Responses 1, 2, and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 343

From: Jennifer Kelly
To: Matt Kelley; Idaho MMEIR
Subject: Mine Concerns
Date: Thursday, February 17, 2022 9:46:31 AM

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10688 James Lane

Nevada City

CA 95959

February 16th, 2022

Dear Mr. Kelley and Council Members,

I am making use of the period for public comment on the issue of reopening a local gold mine, to convey my concerns to you. There are so many obvious reasons why this should not be permitted it seems necessary to write a list rather than a letter.

Ind 343-1

This will not be in any particular order of importance; they are all important,

but as the massive DEIR is currently the center of attention, I will start with those.

AIR QUALITY. The months of huge fires all over the west, every year, mean the air quality in Grass Valley is deemed extremely hazardous for multiple days, unfit for anyone to breathe outside and extremely dangerous for those with existing respiratory problems & children. There can be no question that a mining operation that will include large trucks, laden with toxic rubble, driving along local roads to dump their cargo at a site quite close to the hospital will further pollute the air. Many of the particulates will be of an ideal size to be easily absorbed by human lungs. Unlike the fire season, there will be no respite from the truck season, they will roll all year, so our once pristine air will become a danger to everyone's health all the time. The human misery will be matched by increased costs for health care.

Ind 343-2

How can that be mitigated?

NOISE. The business of crushing rock into manageable sized pieces to be carried by even the largest truck must create noise at a decibel level harmful to the human ear, not to mention, sanity. The added noise of the trucks along their routes will be shared by a large percentage of the population. Our peaceful town will be burdened with the problems of an industrial zone.

Ind 343-3

How is that to be mitigated?

HAZARDOUS MATERIALS ON SITE & IN TRANSIT

Ind 343-4

The Union published an excellent article by Mr. Ray Bryars covering these concerns, in the Other Voices column of the paper of Feb. 16. I echo his worries and add to them the fear that a wildfire could cause a massive explosion, no matter how carefully these dangerous materials are stored.

There is NO mitigation possible here.

WATER

Ind 343-5

As the long drought is teaching us, water is our most precious resource. For this reason alone the mining operation should be firmly denied. No one knows, or can possibly study, the impact of releasing thousands of gallons of water into Wolf Creek. If this water is even slightly polluted it could have serious impacts on water systems & agriculture far downstream. Since the geology of the area, already somewhat unstable due to many small faults, could well be impacted adversely by underground explosions, polluted water could reach far into the ground water, destroying wells and depriving us of an important part of our water supply. There is also a high risk that many local property owners could find their wells dried up or the water unfit for consumption.

How can any of these terrible consequences be mitigated?

ADVERSE EFFECTS UPON WILDLIFE

Ind 343-6

I have seen no studies about this but there are surely problems. Does Rise Gold plan to erect fences or barriers around all or part of the mine site? If so, how will they impact the life of our already endangered creatures? Apart from noise, which we know to be disruptive, especially at breeding times, there will be lights. How bright will they be & how much of the night will they affect? Added traffic, especially heavy trucks will mean more roadkill. We are already finding traces of harmful chemicals in the eggs of songbirds. How much more dangerous will it become for them if our air is laden with mining toxics? They also face peril from polluted water.

To mitigate any of this, lengthy studies would be needed.

TRAFFIC CONGESTION

Ind 343-7

Despite being dismissed in the environmental report as a minor road of little significance, Brunswick is an important connector road in an area without many alternatives. Having a steady stream of large, heavily laden trucks constantly on the road will cause added congestion, inconvenience to local residents and, in the case of a need to evacuate the area quickly, will become a serious threat to a safe operation. They will also cause considerable wear and tear to the roads they use. Will Rise Gold be paying for the repairs and resurfacing needed?

DRAIN ON ELECTRICAL POWER

As we are all well aware, our power supply is already in deep trouble. How will the requirements of a large mining operation be met without impacting local residents and businesses?

Ind 343-8

Even if mitigation of some of these issues IS possible. How would regulations be overseen, inspected & enforced? Who will recruit, train and pay all the staff necessary?

In addition to all the environmental concerns there are other problems. Mr. Mossman has a track record of irresponsibly managing mining projects, then walking away, declaring bankruptcy, leaving the local community to clear up & pay for the damage his operation has done. How can we ensure he will not treat Grass Valley in the same way?

In my opinion, approving this ill - considered project is tantamount to civic suicide. Who will ultimately accept responsibility for that?

Ind 343-9

Sincerely,

Jennifer P. Kelly

INDIVIDUAL LETTER 343: JENNIFER KELLY

Response to Comment Ind 343-1
The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 343-2
Air quality and health risk impacts from the project have been analyzed in the DEIR and have been found to be less than significant after mitigation. Please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 343-3
Crushers would be placed underground and not on the surface, which greatly reduces noise transmission (see page 3-25 of the DEIR). Noise from truck traffic has been analyzed in the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR.

Response to Comment Ind 343-4
Wildfire is analyzed in Chapter 4.13 of the DEIR and hazards and hazardous materials are analyzed in Chapter 4.7 of the DEIR. Please also see Master Response 6 – Wildfire Impacts.

Response to Comment Ind 343-5
The commenter asserts that the project would result in water supply and water quality impacts. Please see Chapter 4.8 of the DEIR regarding water supply and water quality impacts, as well as Master Response 16 - Drought and Climate Change, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek. Regarding the commenter's fault concerns, the magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see the NV5 Memo attached as Appendix P to the Final EIR.

Response to Comment Ind 343-6
As stated on page 3-42 of the DEIR, all access locations at the project sites will be gated and secured. Additional fencing around the aboveground facilities may be installed as part of the proposed project, if deemed necessary for security and safety. Fencing would generally be placed on the publicly accessible borders of the site along E. Bennett Road and Brunswick Road, which are already partially fenced and in the areas of the two headframes and associated buildings. Fencing would exclude some wildlife from the operations areas of the proposed project. No fencing would be placed that would exclude wildlife from the South Fork of Wolf Creek.

Project lighting is discussed and analyzed in Chapter 4.1 of the DEIR, on pages 4.1-23 through 4.1-29 of the DEIR. As demonstrated therein, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The commenter states that additional traffic, especially heavy trucks, will lead to more roadkill. However, the commenter does not provide any evidence that weight of vehicles increases roadkill or that project traffic on existing roads would result in a significant impact to wildlife.

Noise impacts to wildlife is analyzed in the DEIR (see page 4.4-74 of the DEIR).

Response to Comment Ind 343-7

The commenter asserts that the project will result in traffic impacts and roadway wear. Traffic impacts have been evaluated in Chapter 4.12 of the DEIR. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

With regard to evacuation, please see Master Response 5 - Evacuation Zones.

With regard to quality-of-life concerns, please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 343-8

PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. The proposed project would not require or result in the relocation or construction of new electric power facilities. Please see page 4.11-35 of the DEIR.

County, state, and federal regulations and mitigation measures are discussed in detail in the DEIR. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Ind 343-9

Please see Master Response 3 - Operator Responsibility, and Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 344

Matt Kelley
Nevada County Planning Department
950 Maidu Avenue
Suite 170 Nevada City, CA 95959

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 31, 2022

Dear Matt Kelley,

I have made my home in or nearby Nevada City for over 45 years. I am retired from Nevada County Library Service.

Ind 344-1 I have many concerns about how Benjamin Mossman does business and have addressed those concerns (with references) in previous emails to your department.

My main argument against the re-opening of the Idaho Maryland Mine is that our local tourist and visitor economy will be damaged by having an industrial mining operation so close to Grass Valley.

My specific feedback on the Draft Environmental Impact Report is as follows:

Ind 344-2 4.3.2 Existing Environmental Setting
"Ambient Air Quality Standards" - Our county already suffers from bad air quality and my concern is the lack of reference to addressing Asbestos being released. I would like to see an examination of the hazards of exposure and how to mitigate them.

* I am not sure where I found this reference to our General Plan in the DEIR but it addresses my main argument that taxpayers may be "left holding the bag" as happened in Canada with the project overseen by Mr. Mossman:

Ind 344-3 **Policy 17.13 The County shall require satisfactory forms of accessible security, including irrevocable letters of credit, cash deposits, escrowed negotiable securities, or performance bonds, from all mining projects to cover all such damages which may stem from the projects.**

How much of a bond or guarantee would need to be in place to cover the very real possibility of damage, not only to our economy, but to the environment we all care for? My great-grandchildren are growing up here (!).

I have many other concerns regarding the possible reopening of the Idaho Maryland Mine — I have attempted to limit myself to the areas listed in the DEIR.

Sincerely,

Jennifer Long 16665 Eden Ranch Road Nevada City, CA 95959 530-265-5059

INDIVIDUAL LETTER 344: JENNIFER LONG

Response to Comment Ind 344-1
Please see Master Responses 1, 2, and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 344-2
Please see Master Responses 18, 22, and 23.

Response to Comment Ind 344-3
Please see Master Responses 1 and 3.

Individual Letter 345

From: Jenny Todd <noelani.todd6226@gmail.com>
Sent: Monday, April 4, 2022 2:29 PM
To: Matt Kelley
Subject: Letter for the 4pm deadline regarding Idaho-Maryland Mine

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Matt Kelley Senior Planning Commissioner:

My family and I are against the re-opening of the Idaho-Maryland mine, also known as the RISE Mine project. I have lived in Nevada county for 25 years and for 6 years, I attended UNR to complete my Bachelor's and Master's Degree in Biology. I have researched the Rise Mine website and have also researched the long-term devastation caused by deep-ground mining (even if it is termed as "green gold mining"). The negative, long-term environmental consequences outweigh the positive, short-term economic benefits. I believe that the RISE firm has appealed to the community with said economic benefits. There are examples from scientifically researched and supported organizations, like safewater.org, that show deep water mining does ultimately and greatly affect the water tables of the environment. If it is not our immediate water tables that are affected (at a more shallow fractured water tables), we will be taking from some neighboring location that can only be determined when the damage has been done. Mines in Arizona and Nevada can still be traced as sources draining water from areas of northern california even decades after the mines have ceased to function. If this is the case, and we deplete another community's water supply, I do not think it would be unlikely that it could be traced right back to our community and this mine. We would be

1

Ind 345-1

Ind 345-2

economically responsible for restoring their water. I also feel that the RISE website appeals to the community because of LIP SERVICE. The statements are not scientifically supported, or they have kept their sources a secret which contradicts the importance of having proper research to back facts up in the first place. RISE uses misleading verbiage and notions to suggest that they would positively benefit our community via employment opportunities. They have said nothing about how they would select any local employees. They have not said if these employees would be local because they would be temporarily moved to our community to work on the mind. They have claimed that they will provide 612 local jobs, then in the same paragraph they restated that 300 of these employees are implied local business hires because of the influx of cash flow at local businesses. This is a contradiction to what they have said about hiring locally. If these people already live locally then they already use community services. So where would this new revenue be coming from? They are either not hiring locally or they will not generate new revenue locally, which one is it? Let's not be hoodwinked by superficial jargon and deceptive information. There is a reason that a corporation with an unpleasant history (abandonment of job site cleanup and neglect for the environment) is trying to establish temporarily here, ruse our community, and expend our land. When things sound too good to be true, they typically are. There is no such thing as an environmentally friendly way to do a large mine operation. My last thought is in regard to the deep ore that RISE claims will be removed from the ground and used for development of land surrounding the mining site. The breaking up of this solid ore means crushing and releasing other contaminants in the ground. The solid ore that is broken up to be brought out of the deep mining site contains elements that when exposed to oxygen release contaminants into our environment. We might not see the

Ind 345-3

Ind 345-4

2

effects of these harmful contaminants on a short-term time scale. Perhaps 10 years down the line, we will be experiencing irreparable damage visible by the absence of insect and animal life in the community. We will have to wonder how to explain to our children and their children why the land and water is unusable, or why it is hard to find insects or birds in our area. We will have to reflect on the forgotten few years of supposed financial gain and wonder if it was worth the tradeoff. The long-term effects of mining are what really need to be considered. For our community, reopening one of CA's largest god mines could be the worst path possible.
Thank you for your time,

Jennifer Todd, M.S.
(530)477-1940

INDIVIDUAL LETTER 345: JENNIFER TODD

Response to Comment Ind 345-1

This comment is introductory in nature. The commenter's opposition to the project is noted for the decisionmakers. The commenter also states the economic benefits of the project are outweighed by the environmental impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 345-2

The commenter states that the project will have an adverse effect on the water table. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 345-3

The commenter states that the local employment benefits of the project are overstated and the commenter references the Project Applicant's prior mining project. The comment does not address the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 345-4

The commenter states that the waste rock from the Idaho-Maryland Mine contains toxic substances and will have adverse impacts to biological resources on the surface. The commenter is referred to see Master Response 8 - Mine Waste Characterization. The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 346

From: Jennifer Weir <j.weir@me.com>
Sent: Saturday, April 2, 2022 9:22 PM
To: Idaho MMEIR
Subject: Draft EIR for the reopening of the Idaho Maryland Mine

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Hello,

Ind 346-1 I am a resident at 13913 Gopher Hill Ct. Grass Valley. I would like to voice my objection to reopening the mine. My greatest oppositions lie with groundwater concerns due to dewatering the mine, to the backfilling of the mine, as well as, the increased traffic and noise associated with the number of trucks arriving and departing the facility.

Ind 346-2 We moved to this location specifically for the beauty, tranquility, and community feel of the Grass Valley/Nevada City area. I feel that these characteristics are under attack.

Ind 346-3 After reading the Draft EIR, I am not content with the remediation options provided. I do not have faith that RISE will meet its obligations to help residents with depleted wells. I do not have faith that RISE will be around to deal with the inevitable "unforeseen" environmental consequences that will result from this mining process. History is littered with stories of companies fighting resident claims, denying culpability, and going bankrupt leaving local, state and federal government agencies with the task of footing the bill and cleaning up the mess.

Ind 346-4 There are many unknowns that are likely unaccounted for. For example, the possible extended drought conditions in California and the impacts on groundwater in the area exacerbated by the RISE dewatering. Additionally, many of our local waste water treatment facilities have trouble dealing with dramatic inflows of water that occur with unexpected atmospheric river events. Will RISE's WTF be able to accommodate 50 year or 100 year rain events? Weather events in CA have become more extreme over my life in California.

Ind 346-5 This type of project should not be allowed in our area. We risk losing the character and aesthetic that draw thousands to our area every year. Large scale mining should remain part of our region's history but not a part of our present and future.

I don't know how anyone could read this report and say that this is a good idea for our community.

Sincerely,

Jennifer Weir

INDIVIDUAL LETTER 346: JENNIFER WEIR

Response to Comment Ind 346-1
Please see Master Response 1 – Non-EIR/Administrative Issues. In regard to groundwater, please see Master Reponses 14 and 15. Traffic is addressed in Chapter 4.12 (Transportation) of the DEIR and noise is addressed in Chapter 4.10 (Noise and Vibration).

Response to Comment Ind 346-2
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 346-3
The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 346-4
Please see Master Response 16 – Drought & Climate Change.

The proposed project includes a septic system and leach field to accommodate wastewater treatment. The DEIR, on page 4.6-49, notes that according to the septic system evaluation, a relatively large, acceptably permeable soil area has been identified within the proposed leach field area. The evaluation concludes that the project site is suited for a Pressure Dose sewage disposal system with a minimum of 1,935 lineal feet of leach line. A minimum 10,000-gallon septic pump tank with watertight risers over each lid and outlet effluent filter would be required. The pump tank would be oversized in order to accommodate for potential power loss, backups, and surge flows in the future. In addition, Mitigation Measure 4.6-4 requires that all drainage be diverted away from the septic tank, pump tank, and leach field.

Response to Comment Ind 346-5
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 347

From: Jere McGrew
To: bdofsupervisors
Subject: Idaho Maryland Mine
Date: Saturday, March 19, 2022 4:33:41 PM

Dist 1

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Ind 347-1

Dear Board of supervisor members,

My husband Paul and I strongly oppose reopening the Idaho Maryland Mine by the Rise Gold company!
We live off Banner Mountain road in an area that is included in the mineral rights map and Do Not want to endanger our water and air quality in any way.
The environmental impact report is just a series of assumptions, not guarantees that our precious natural resources will be unharmed. Any damage that occurs could be irreparable and how tragic that would be!

We passionately ask that you reject.the Rise Gold plan to reopen the mine.

Paul and Jere Mcgrew

INDIVIDUAL LETTER 347: JERE MCGREW

Response to Comment Ind 347-1

Please see Master Response 1 – Non-EIR/Administrative Issues. Water quality is addressed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR. Air quality is addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 348

From: Jeree Waller <jeree@careandprayer.com>
Sent: Friday, April 1, 2022 7:44 AM
To: Idaho MMEIR
Subject: my public comment about mine

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Ind 348-1

As a 42 year resident of Nevada County, I am voicing my strong opinion that the mine should not be allowed to reopen. I have asthma, and our air quality is already very poor, so any added pollution is out of the question for myself and many, especially children. The noise, traffic, water usage and the fact that this company has already polluted a Native American site, are certainly other reasons to vote down the mine. Our Nisenan Rancheria should have a voice in shutting down this irresponsible move, as well.

Thank you for supporting the majority of local residents who do not want the Idaho Maryland Mine to reopen.

Blessings,

Jeree Waller
17247 Patricia Way GV 95949

Virus-free. www.avg.com

1

INDIVIDUAL LETTER 348: JEREE WALLER

Response to Comment Ind 348-1

Please see Master Response 1. Air quality is addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR. Traffic is addressed in Chapter 4.12 (Transportation). Water is addressed in Chapter 4.11 (Public Services and Utilities). The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

In addition, as detailed in Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR on page 4.5-21, InContext contacted Native American tribes with the potential to have knowledge of cultural resources in the project area, which included the Nevada City Rancheria Nisenan Tribe. Reponses were not received from any of the tribes. Furthermore, on November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to Assembly Bill (AB) 52 to Native American tribes who had previously requested to be notified by the County. The tribes contacted by the County pursuant to AB 52 included the Nevada City Rancheria Nisenan Tribe. The Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period.

The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 349

From: Jesse Mendez <builderjess@yahoo.com>
Sent: Monday, April 4, 2022 11:13 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Voting NO on reopening Idaho-Maryland mine

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Dear Board of Supervisors,
I am encouraging our BOS to vote NO on reopening the Idaho-Maryland mine. I have many concerns, but I'll try to keep my email brief and will highlight just a few of the items I'm most concerned with.

Ind 349-1 1. Our mining history cannot be denied, but with a more populated area, and many residents dependent on well water, there is no way to guarantee that wells will not be compromised, either in performance, or quality. The San Juan Ridge mine is a prime example of a disaster that COULD happen. I understand that aquifer systems differ, but the one common trait is that there is no way to map the fractures that groundwater moves in, and as a result, dewatering can drain systems in unanticipated ways. It can also unlock impurities trapped in rocky areas, etc. While initial commitments to maintain well integrity are well meaning, there really is no way to guarantee that well water and quality of life for many residents will not be affected.

Ind 349-2 2. We're a tourist town, and as such we get a decent amount of traffic with good weather. The idea that trucks will be hauling material essentially 24 hours per day is not appealing. Impacting neighborhood traffic and busy residential and commercial areas, there is bound to be additional debris on our roadways and freeways. The constant hauling by semi trailers will also further degrade our roadways, and I imagine increased chipped and fractured front windshields from the dropped rock in roadways is to be expected. I don't see this as a positive trade off for a a few jobs.

Ind 349-3 3. DEIR-As a draft report, we seem to be missing some key information, one of which is utilizing the Centennial site that is planned for additional mine waste. How is the existing site to be cleaned up and maintained? I also don't understand how the ability to "blast" essentially 24 hours a day is not going to impact established residential areas. We are still a small town, so any active mining claim that incorporates old school hard rock mining is bound to be disruptive to established communities. There is no way around it. It will be noisy and messy, and with seemingly no hard guidelines on hours/restrictions, it is a nightmare waiting to happen, being allowed to happen.

Ind 349-4 4. The amount of released water into Wolf creek is sizeable. I don't believe the Impact Report can accurately predict how this already fragile ecosystem and watershed will be affected. With any sustainable release, existing biology will be affected for years to come, and estimated flows are just that, estimates. Until water is pumped from underground mines, there is no way to know just how much flow the creek will experience. With help from the community, the creek is looking healthier than it has in years.

Ind 349-5 5. Management team has poor track history- every situation is different, but what is not different is whether or not a business model really works and is environmentally responsible. Ben Mossman and his team do not have a proven track record, and in fact, their record is one of environmental and community failure. Knowing what he has left in other areas is fair warning to what he could leave for Grass Valley.

Ind 349-6 I would expect our BOS for vote NO on this matter, placing priority on what is best for our community for sustained long term health of our residents and town.
Sincerely,

Jesse J. Mendez
Grass Valley Resident
461 Brighton Street

INDIVIDUAL LETTER 349: JESSE MENDEZ

Response to Comment Ind 349-1

The commenter urges the Nevada County Board of Supervisors to not approve the project. The commenter is concerned about the project's impacts to groundwater and states that it is not possible to anticipate the impacts from dewatering the Idaho-Maryland Mine. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Regarding impacts to private wells, the DEIR states that impacts to groundwater supplies would be less than significant after mitigation (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 349-2

The commenter is concerned about the project's traffic-related impacts and states that the roadways can already become congested due to tourism. The commenter also states that the project's truck traffic will degrade the roadways. The DEIR discusses traffic impacts in Chapter 4.12 and found that the impacts would less than significant after mitigation, with the exception that the impacts to the intersections at SR 174/Brunswick Road and Brunswick Road/Sutton Way would be significant and unavoidable even after implementation of mitigation. Regarding damages to the pavement from project traffic, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between Project Driveway and Brunswick Road. Lastly, project trucks would not be hauling 24 hours per day. (DEIR, Table 3-7)

Response to Comment Ind 349-3

The commenter states that DEIR is lacking a discussion of the Centennial Industrial Site cleanup. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter also states that blasting 24 hours per day will be disruptive to residences nearby. The DEIR analyzed underground blasting for the project and found that the noise from blasting would fall below applicable criteria. (DEIR, p.4.10-45.) Regarding groundborne vibrations from blasting, the DEIR found that impacts would be less than significant after mitigation. The commenter is also referred to Master Response 7 - Location of Future Mining Areas. Regarding the assertion that blasting would occur 24 hours per day, blasting activities are proposed to take place twice daily, with blasting between shifts at 7AM and 7PM, with 3 to 4 drift rounds blasted every 12 hours between shift changes and longhole blasts of approximately 3,300 tons of rock taking place once every 3-4 days. (DEIR, p. 4.7-28.) Notwithstanding the above well-supported conclusions in the DEIR, mitigation measures (4.10-3 and 4.10-4) have been included requiring the applicant to perform robust noise and vibration monitoring programs throughout the life of the project.

Response to Comment Ind 349-4

The commenter is concerned about the impacts to South Fork Wolf Creek from the discharge of treated water. The commenter is referred to Master Response 36 - Flows in South Fork Wolf Creek.

Response to Comment Ind 349-5

This comment references the Project Applicant's prior mining project and does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 349-6

The commenter reiterates opposition to the project. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 350

From: Jesse Nugent <jessenugent@gmail.com>
Sent: Monday, April 4, 2022 11:53 AM
To: Idaho MMEIR
Subject: Comment on proposed mine operations

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Ind 350-1 There are too many risks and compromises to the ecosystem, wildlife, and community for this mine re-opening to be beneficial. There is no way to guarantee that many mitigation measures will actually serve to do anything other than act as "damage control".

Ind 350-2 There are many alarming changes proposed in this seemingly endless list of compromises to be passed on to the community. The owner of this mining company(Ben Mossman) downplays many key issues and claims on a recent news story that only "up to 7 wells could be effected". His solution is to supply treated NID water to these properties. In reality, we will be sacrificing hundreds of millions of gallons of groundwater during a drought. It's not possible to fully understand how this will effect other wells or nearby portions of the watershed. The one thing that is known is that it will not benefit the community/residents, wildlife, or ecosystem to lose that water or stir things up underground.

Ind 350-3 No amount of mitigation measures will compensate for the amount of pollution, traffic, noise, and other unpleasant side effects an operation like this is going to bring with it.

Ind 350-4 You don't have to look far to find that Ben Mossman has a troubled past. He has a history of illegal practices and negligence that have caused damages to ecosystems that can't be repaired- https://www.cbc.ca/news/canada/british-columbia/b-c-s-high-court-upholds-new-trial-for-two-managers-after-spill-at-mine-1.5784666

Ind 350-5 Since the gold rush, the community has become very agricultural and this mine will harm the farming industry. There is no good reason to dump ground water and create exponentially more green house gasses in our area especially during a drought. What happens underground effects what's above as well. We are very lucky the town didnt go up in smoke last year during the river fire...

I hope this decision is made responsibly for the longevity of grass valley and future generations.

Jesse Nugent

INDIVIDUAL LETTER 350: JESSE NUGENT

Response to Comment Ind 350-1
Please see Master Responses 1.

The comment expresses a general opinion that the mitigation measures set forth in the DEIR serve more as "damage control," than as tangible steps required of the proposed project to reduce the severity level of potential impacts identified in the DEIR, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 350-2
Please see Master Responses 14, 15, and 16. The commenter expresses general concerns regarding groundwater but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 350-3
The comment expresses a general opinion that the mitigation measures set forth in the DEIR will not "compensate" for potential impacts, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 350-4
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 350-5
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Individual Letter 351

From: Jessica Higgins
To: bdofsupervisors
Subject: letter from district IV
Date: Monday, March 14, 2022 8:35:05 PM

Dist 4

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March 14th 2022
To Whom It May Concern

My name is Jessica Higgins and I live in District IV with my 8 year old daughter and my husband. My daughter, Lili, and I are writing this letter together to share our stance on the potential reopening of the Idaho Maryland Mine. We love living here and care deeply for our community. I work at Sierra Nevada Memorial Hospital as a nurse and my daughter attends Grass Valley Charter School. We are heartbroken thinking that a company like Gold Rise might have a chance to exploit this precious place we call home.

Ind 351-1

We are strongly opposed to the reopening of the mine for many reasons.

Ind 351-2 Reopening the mine threatens hundreds of private wells.

Ind 351-3 The expected energy draw of the mine operations would put a serious strain on our power grid and move us further away from environmentally responsible power use.

Ind 351-4 The water that would be removed from the flooded mine shafts is polluted and when released into the streams and creeks that make up our watersheds, it would decimate the flora and fauna of that precious ecosystem.

Ind 351-5 The actual mine work will be loud and detrimental to the people who live in the area.

Ind 351-6 The increased traffic of heavy vehicles on our roads is also undesirable.

There are so many better ways to boost our economy. Take for example the mountain bike trails we have added and the huge boost to the local economy that tourist attraction has provided. People come into our community and spend money locally. Or, as another example, look at the pre-pandemic impact of hosting the Wild and Scenic Film Festival here. Let's work on healthy, sustainable ways to draw money into our economy. The mine will provide few jobs and the wealth generated will mostly be going to a foreign company.

Ind 351-7

Please, we can do better than this! Put your local constituents and our precious environment first. Vote no on the reopening of Idaho Maryland Mine.

Thank you for your time,
Jessica Higgins, RN BSN
and
Lili Doleman

INDIVIDUAL LETTER 351: JESSICA HIGGINS

Response to Comment Ind 351-1
Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 351-2
Please see Master Responses 14 and 15.

Response to Comment Ind 351-3
Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. Based on the incorporation of various measures, including the applicant's proposed APM-AQ-1 (Exhaust Emission Control) and Tier 4 engines as required by Mitigation Measure 4.3-1(b), the DEIR concludes that the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy, and a less-than-significant impact would occur.

Response to Comment Ind 351-4
Please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 351-5
Noise is addressed in Chapter 4.10 (Noise and Vibration) of the DEIR. The commenter expresses general concerns regarding noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 351-6
Traffic is addressed in Chapter 4.12 (Transportation) of the DEIR. The commenter expresses general concerns regarding traffic but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 351-7
Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 352

I DO NOT support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 352-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Jill Francis

Address 218 Rhode Island St ZIP 95945

Phone

Email Address

INDIVIDUAL LETTER 352: JILL FRANCIS

Response to Comment Ind 352-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 353

2.7

TO: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

April 2, 2023

Idaho.MMEIR@co.nevada.ca.us

FROM: Jim Bair, Scientist (ret); Business Owner
128 Sierra Blanca Ct.
Grass Valley, CA 95945

Subject: Idaho-Maryland Gold Mine Project, DEIR Comment on *Appendix E2: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan*

Introduction

The purpose of this Comment on the DEIR is to show that asbestos air pollution cannot be mitigated to safe levels as claimed by the DEIR. The inadequacy of asbestos mitigation results from the fundamental nature of the project: it is not feasible to contain asbestos with the huge above ground transporting and dumping (1500 tons a day) of asbestos containing material (defined as 0.25% or greater by California Air Resources Board (CARB)). See the DEIR body Page 4.3-8 for a description).

Ind 353-1

The DEIR does describe asbestos pollution to be significant. It states upfront that "Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure. (page v, Air Quality and Greenhouse Gas Emissions Analysis Technical Report).

However, the mitigation proposals and the referenced CA code make an implicit and profound assumption that asbestos is dust which it is not. As documented below, asbestos fibers may be in dust, but dust particles are much larger and therefore visible. While dust may be manageable, asbestos fibers (ave. .5 microns) become fugitive and airborne to be carried many miles from origination. Asbestos pollution is comparable to wildfire smoke which contains gaseous and particulate matter.

Regardless of issue of dust (versus smoke), the DEIR does not even contain an Asbestos Dust Mitigation Plan (ADMP). Therefore, this vital part of mitigation cannot be used to determine DEIR adequacy. The DIER cannot be certified unless a ADMP is reviewed and approved. Quote: "Prior to the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. [sic] shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD)." It is not consistent with the intent of CEQA to use a report or document that is not available as an impact mitigation.

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Ind 353-2

Furthermore, the portion of Mine tailings intended to be used as engineered fill is uncertain because fill contaminated by asbestos is prohibited when one of the uses would be in road construction such as surfacing. The CA law (California Air Resources Board, CARB) is unambiguous: "…no person shall use, apply, sell, supply, or offer for sale or supply any restricted material (as defined in subdivision (i)(20)) for surfacing, unless it has been tested using an approved asbestos bulk test method and determined to have an asbestos content that is less than 0.25 percent." [i] The Rise Gold Mine processing of aggregate, "engineered fill", would not qualify for a CARB exemption. (c.f. ref. i)

General Comments on DEIR Appendix E2, *ASUR Management Plan*

Ind 353-3

Section 1.0 recognizes the inevitable introduction of asbestos into the air by stating that this plan will only "…**minimize** the potential for public exposure to airborne asbestos from the Project…" not eliminate it. (p.1) The section further states that it includes "… testing methods that Rise will implement throughout the life of the project…" which is 80 years. I note below that testing is and will be extremely constrained because it is dependent upon a lengthy, complex process involving small samples of rock that will have to be shipped to testing companies such as those in Berkley and Oakland unless an electron microscope lab is set up on site (see below).

Ind 353-4

Section 4.0 Project Overview represents a clear description of the Idaho-Maryland Mine Project. It is a matter-of-fact depiction of a project so massive the average person including non-expert government officials will have a hard time comprehending the enormity. I judge the representation of the sheer magnitude of the project to be inadequate. As stated, quote, "Gold mineralization production through tunneling and long-hole blasting produces 1,000 tons per day (365,000 tons per year) of mineralized material. Approximately 50 percent of the mineralization [see note below] will be returned to the underground mine as backfill after processing and the remainder of the sand tailings will be used for engineered fill." Blasting will continue 24 hrs. per day, 7 days a week under 2,585 acres, roughly 2/3 the size of Grass Valley.

Ongoing explosions are to occur as little as 200 ft. below inhabited areas, in multiple areas simultaneously. Quote: "The tunnels are constructed in 10-foot advances per blast (a "round"). Parallel holes are drilled into the rock face, loaded with explosives, and then detonated to fragment the rock. The broken rock is moved to the surface, the tunnel is supported with rock bolts and screen, and then the process starts again to continue advancing the tunnel. **A number of tunnels will be under construction throughout the mine area at all times during the life of the mine.**" (p5) [bold added]. The project should be evaluated by comparison to other massive extraction projects in populated areas a number of which have failed. **The DEIR**

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should provide evidence by example that no residential areas have been rendered unhabitable.

Section 5.0: Asbestos measurement is detailed in the ASUR Plan (ref. source 4 below, Idaho-Maryland Exploration Asbestos Sampling… 8.1). Asbestos fibers are very small (often <0.0005 mm in diameter) [0.5 microns]. In order to quantify the asbestos concentration, a sample has to be studied at 1000–2000 times magnification. An electron microscope has to be equipped with an "energy dispersive sector", which allows the chemical composition of the fibers to be determined.[ii]

Ind 353-5

While the ASUR Plan states that asbestos analytical methods can detect fibers "0.0002 microns" in diameter (p. 7; see Note 9 below), **the Plan does not address the measurement of airborne fibers.** This is an indication of an inadequate treatment of asbestos fiber size which greatly influences asbestos motility, and consequently public health in the populated area. The size of asbestos fibers predicts airborne movement. Fibers as small as a micron (1 millionth of a meter), are extremely difficult to measure and even more difficult to manage in a natural outdoor environment. (1mm = 1000 microns).

The DEIR does not explain how fibers of this size can be detected on site during above ground processing (planned movement of 3,000,000 lbs. of rock a day). The ASUR Plan indicates there will be testing, perhaps hourly, for asbestos – this would require that a lab including an electron microscope be on site. Note that the Plan equivocates by stating, "Sampling and analytical testing will be done on or off-site by trained and qualified persons under the direction of a State Licensed Geologist." (p. 13) Until an adequate testing plan for asbestos during rock processing (crushing, shafting, dumping, loading, etc.) is submitted and approved, this air quality pollution impact from asbestos is Significant and Unavoidable.

Ind 353-6

Cancer potency is critical to assessing air pollution impact. But the ASUR Plan states that "TEM [Transmission Electron Microscopy] is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. The term "TEM structures" is often used to describe asbestos fibers detected by this method. TEM is the method recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). However, **TEM measurements cannot be directly related to the cancer potency** factors because the studies upon which OEHHA's risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units (OEHHA 2015)." [bolding added]

Ind 353-7

The *2002-07-29 Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations(June 3, 2015) Final Regulation Order* for toxic control is copied into the ASUR Plan Appendix B. While the code requires extensive measures to

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control asbestos, **we cannot find any commitment or plan in the DEIR to implement these measures, or CA agencies that have the resources/manpower for enforcement,** e.g., Air Pollution Control Officers (APCO). The DEIR must be evaluated with the realty of comprised enforcement (reported to be 3 Officers for the entire air district).

Detailed Comments on Asbestos Measurement

Ind 353-8 1. Asbestos measurement levels are the basis of proposed mitigation and significance. But asbestos measurements are from underground core samples described in the ASUR Plan -- the relationship between asbestos found in rock samples and how much becomes airborne must be described. Note that despite the unacceptable sample size, several samples were positive: "Actinolite Asbestos Detected, Non-Regulated Amphibole (5 Hornblende) Observed. Concentration in Millions of Fibers per gram: 29 actinolite fibers >5um in length. Possible contamination."

Ind 353-9 2. Samples have been taken in known vein areas with preference to existing tunnels/exploration (see maps in ASUR Plan Appendix C). Rise Gold Inc. has no constraints on the location of new tunnels in the Mineral Rights area. There is a huge amount of lithogenic variability in the area, e.g., serpentine rock (high asbestos likelihood) is not in the sample set, but present in the Mineral Rights area. **Additional core holes and samples are necessary to project asbestos quantity in extracted rock**.

Ind 353-10 Current testing samples are not even close to representative. The mineral rights area of 2585 acres is represented by 19 exploration drill holes, or 1 drill hole per 136 acres, from which 40 to 42 samples are taken (see tables in ASUR Plan Appendix C) beginning downward at 200 ft depth. That is less than .02 samples per acre (2 100ths of one sample per acre) equal to 1 sample per 65 acres. **A representative sampling of the mineral rights area must be described and committed to in the DEIR.**

Ind 353-11 3. Section 4 is history based, but immediately thereafter in Section 5 there's a discounting of the serpentine areas, even though serpentine rock has indigenous asbestos, and then a statement that there are 19 sample drillings. The next paragraph states that there were 43 drill core samples. Currently, there is no explanation of how likely asbestos is to be in rock *adjacent/proximal* to the samples. There needs to be a description in the DEIR of the sampling location regimen and generalization process that was used.

Ind 353-12 4. Section 5.0 (p.7) states, in a circumspect way, that the inappropriate measurement technology, PCM, was used initially and then the more sensitive technology, TEM, was used. TEM was then declared as the incorrect methodology for the California Office of Environmental Health Hazard Assessment (OEHHA). "In 2021, Rise requested the 40 samples previously

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submitted to be reanalyzed using the TEM method." Then the Plan says, "**TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis."** This is simply confusing and obfuscating in complexity and there's no further discussion of cancer potency.

A decision was made based on regulation and the type of measurement, TEM or PCM, to do both, although Section 6.0., p.8, repeats the plan to convert TEM to PCM.

Ind 353-13

6. Further ambiguity is evidenced by unclear description of the effect of asbestos presence in either gold ore or barren rock. If planned barren rock tunneling is projected to be Asbestos Containing Material, a location for underground disposal will be found. If gold ore has asbestos, "An operational plan **will be** prepared and approved to ensure that all sand tailings derived from processing of gold mineralization which is projected to be Asbestos Containing Material will not be trucked for use as engineered fill." In other words, the detection of asbestos in rock would result in useless gold ore or barren rock? The plan does state: "Barren rock will be co-disposed with cemented paste backfill or placed (uncemented) in abandoned tunnels."

So, between asbestos-contaminated gold ore and barren rock, will there still be enough rock to warrant the massive trucking of 1000 tons a day to the Centennial dump site and beyond? This is not a facetious question and must be answered in the DEIR by modifying Section 6.0, item 7 and including the *Surfacing in Engineered Fill Placement Plan* in the DEIR. DEIR cannot be approved until that operational plan is completed. "An operational plan **will be** prepared and approved to ensure that all sand tailings derived from processing of gold mineralization which is projected to be Asbestos Containing Material will be used for underground cemented paste backfill and not for Engineered Fill." (p.7) [bold added]

Ind 353-14

7. Despite the difficult detection of asbestos in core samples leading to detection of significant presence in approximately 32% of the core samples, there is no established method to determine how much will be airborne. **We cannot find any evidence that underground/in solid/gravel rock sampling is a valid basis for generalizing to airborne asbestos presence.**

Ind 353-15

Conclusion:

Asbestos creates a risk for Rise Gold Inc. such that finding all the dangerous asbestos is too problematic and expensive for mine operation. Common business sense, especially in such a highly leveraged operation, would minimize sampling of the **3,000,000 pounds of rock moved per day, thus contributing to lethal air pollution from asbestos.** One can only imagine the number of licensed geologists chasing 3 million pounds of rock daily only to have to transport it to Berkeley/Oakland for TEM or PCM testing or both.

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The sampling methodology is inadequate to predict the quantity of asbestos in 547,500 tons of rock removed from the earth every year, **or the quantity of asbestos that will become airborne.** The fact that asbestos was found in a number of core samples proves it is present. Moreover, there is too high a probability that there will be sufficient airborne asbestos to cause regional contamination leading to sickness and increased mortality.

Research concludes that asbestos fibers from mining are small enough to spread widely when airborne and penetrate deeply into the population's lungs. [iii]

Respectfully submitted,



James Bair, Scientist at Stanford, Bell-Northern Research, and Rome Research Center (USAF)

Notes:

1. "Mineralization", has a different meaning in science. "**Mineralization is the process by which chemicals present in organic matter are decomposed or oxidized into easily available forms to plants.**" In the DEIR **Mineralization** denotes rock that contains gold ore. **Mineralization should be used to denote extraction of minerals using a chemical process.** For mineralized rock to be returned to the tunnels, it must be chemically processed to separate the gold, or be unusable because of excessive amounts of toxins like asbestos.

Ind 353-16

2. Quote from DEIR body, **Page 4.3-80: setting "minimize" as the standard -- it should be quantified**

"Asbestos: With regard to potential asbestos emissions from mining, Rise Grass Valley Inc. would be required to comply with applicable regulations, including those established by the MSHA and CARB, that limit potential exposure for workers. Further, as described in APM-AQ-3, the project would include implementation of an ASUR Plan that has been designed to **minimize** asbestos in the engineered fill produced by the project, as well as asbestos fibers generated from underground mining exhausting to the surface. Finally, pursuant to the CARB ATCM for Construction, Grading, Quarrying and Surface Mining Operations, an ADMP is required to be submitted to the NSAQMD for any project with greater than one acre of surface disturbance if any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock or if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined

Ind 353-17

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by the owner/operator or the Air Pollution Control Officer. Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis,41 **an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health**." [bold added]
[Note reference: "Samples containing naturally-occurring asbestos were from underground rock only; naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Industrial Site or Centennial Industrial Site." Repeat of 4.3-2 Asbestos Dust Mitigation Plan from DEIR body: See Page 4.3-82]

Ind 353-18

3. Paving with engineered fill is illegal; Air Pollution Control Officer (APCO) warning sign:

WARNING! This material may contain asbestos.
It is unlawful to use this material for surfacing or any application in which it would remain exposed and subject to possible disturbances.
Extreme care should be taken when handling this material to minimize the generation of dust.

4. See *Overview of the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) | US EPA*
https://www.sciencedirect.com/search?qs=asbestos%20and%20gold%20mining)

5. Brooke T. Mossman. *Mechanistic in vitro studies: What they have told us about carcinogenic properties of elongated mineral particles (EMPs) [i.e. asbestos]* **Toxicology and Applied Pharmacology** Volume 361, 15 December 2018, Pages 62-67. "These studies demonstrated a spectrum of pre-neoplastic changes, including hyperplasia and squamous metaplasia, in response to long (>5 µm in length) needlelike EMPs [i.e. asbestos].

6. David H. Garabrant and Susan T. Pastula. *A comparison of asbestos fiber potency and elongate mineral particle (EMP) potency for mesothelioma in humans.* **Toxicology and Applied Pharmacology.** 2 August 2018.

7. *Asbestos-Related Disease.* Patti Kratzke MN, RN, CC, Ma and Robert A.Kratzke MD, **Journal of Radiology Nursing** Volume 37, Issue 1, March 2018, Pages 21-26. "Asbestos exposure results in a spectrum of respiratory diseases. Both mesothelioma and lung cancer are directly associated with exposure to asbestos usually after a long latency period, whereas other noncancerous diseases such as asbestosis result in crippling debility..."

Ind 353-19

8. **Credibility**: The DEIR is substantially copied from previous consultant contracts is evidenced by a reference in Table 4.3-3 to Portola Valley in the Bay area: "Fine Particulate Matter (PM2.5) Annual Mean Attainment (with the exception of the Portola Valley) Attainment (with the exception of the Portola Valley)" [a town in the CA Bay Area].

7

2.7

Ind 353-20

9. The report should clarify if 0.0002 microns should be 0.0002 **mm**, since measuring the size of atomic particles is not relevant. (p. 7): "TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) …"

Specific DEIR Documents Analyzed:

DEIR Source 1: DEIR
https://www.mynevadacounty.com/DocumentCenter/View/41650/Idaho-Maryland-Mine-Project-Draft-EIR_Volume-I-Draft-EIR-Chapters-1-8

DEIR Source 2: DEIR Appendix -E2, Idaho-Maryland Mine Project: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan , Rise Grass Valley Inc. November 2021.
https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan

DEIR Source 3: Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California Prepared for: Rise Grass Valley Inc. PO Box 271 Grass Valley, California 95945 Prepared by: 1102 R Street Sacramento, California 95811 Contact: Matthew Morales NOVEMBER 2021.

DEIR Source 4: ASUR Management Plan APPENDIX C, Idaho-Maryland Exploration Asbestos Sampling, DEIR Appendix -E2, Idaho-Maryland Mine Project: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan , Rise Grass Valley Inc. November 2021.

References

[i] https://ww2.arb.ca.gov/sites/default/files/classic//toxics/atcm/asbeatcm.htm

[ii] Hwang CY. *Size and shape of airborne asbestos fibres in mines and mills.* **Occupational and Environmental Medicine** 1983;**40**:273-279.

[iii] G. Gibbs, C. Hwang. *Dimensions of airborne asbestos fibres.* 1980; **Environmental Science**, IARC scientific publications." "Systematic measurements were made of the dimensions of fibres found in the air in mines and mills for crocidolite, amosite and chrysotile. Samples were collected on membrane filters and examined in light, transmission electron and scanning electron microscopes. The proportion of short fibres was shown to decrease with extent of processing, especially for amosite. No airborne fibres had a diameter greater than 3 micrometers, and all would therefore be capable of reaching the pulmonary alveoli."

INDIVIDUAL LETTER 353: JIM BAIR

Response to Comment Ind 353-1

The commenter suggests that the asbestos mitigation, including the Asbestos Dust Mitigation Plan (ADMP), is insufficient to mitigate asbestos impacts. Prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR). The Health Risk Assessment (included in Appendix E.1 of the DEIR) is based on conservative assumptions, as described in Master Response 22 – Conservatism used for Asbestos Assessment. Nevertheless, the DEIR concluded that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Various project activities create dust particles which are assumed to contain naturally occurring asbestos for the purposes of the Health Risk Assessment. These naturally occurring asbestos fibers are minerals contained within the rock and must be liberated and become airborne to pose a public health risk. The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM_{10}) is liberated and would be counted as 1 structure in a given airmass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. These enclosed fibers would not be counted as asbestos in an air sample because they have no effect on human health. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

The commenter suggests that management of dust does not result in the management of asbestos fibers and that any asbestos fibers in the air would be similar in geographical distribution as wildfire smoke. These opinions and concerns expressed by the commenter are noted by the County. However, substantiation of these assertions is not presented in the comment letter. It appears that the commenter does not understand the nature of naturally occurring asbestos fibers, which are part of the mineral composition of certain rocks. While the air quality analysis assumes a conservative level of asbestos fiber liberation into air (see Master Response 22 – Conservatism used for Asbestos Assessment), most asbestos fibers present in rocks would not be liberated from either the rock or dust particles created from the rocks and would not be counted as asbestos in an air sample because they have no effect on human health. Additionally, as asbestos fibers are considered a subset of coarse particulate matter, reduction in dust concentration at a receptor location would result in a reduction of asbestos at the receptor location with a corresponding reduction in calculated health risk.

Finally, the commenter believes that the ADMP must be reviewed and approved during the CEQA process. However, the commentor is incorrect, as ADMPs are typically prepared and approved after the CEQA process is complete. CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR

§ 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]). Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Ind 353-2

The commenter refers to the requirements of the Asbestos ATCM for Surfacing. All materials would be tested in accordance with the Asbestos ATCM for Surfacing. Materials with detectable asbestos by PLM testing would not be used for Surfacing (see page 4.3-61 of the DEIR).

Response to Comment Ind 353-3

The commenter believes that asbestos testing proposed for the project will constrain the project unless an electron microscope lab is set up on site. Two methods of asbestos testing are required under the ASUR Plan. Polarized Light Microscopy (PLM) testing is required to comply with the Asbestos ATCM for Surfacing and trucks may not transport material without a receipt based on the PLM results. Any materials with detectable asbestos would not be allowed to be used for surfacing. As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. The purpose of Transmission Electron Microscopy (TEM) testing, which utilizes an electron microscope, in the ASUR Plan is not to control the fate of the rock and tailings after it reaches surface (that is the purpose of the PLM testing described above). Rather, the TEM testing is done for forward planning purposes to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. Therefore, the TEM results are not required immediately and would not constrain the project operations as asserted by the commenter.

Response to Comment Ind 353-4

The commenter states that blasting will continue 24 hrs per day 7 days a week under 2,585 acres and those ongoing explosions are to occur as little as 200 feet below inhabited areas. As discussed in the DEIR, regular drift round blasting would occur approximately twice daily over several seconds. Longhole blasting might occur every three or four days and would last for only seconds. Blasting would typically take place between work shifts (7:00AM and 7:00PM). Except for the construction of the proposed Service Shaft, located on the applicant's surface property, no blasting would take place closer than 500 feet below ground surface. Economic gold mineralization does not exist everywhere within the mineral rights and therefore blasting would not take place under an area of 2,585 acres. As shown on Sheet 15 of Appendix K.2, assumed mining areas are based on the projected down-dip extensions to mineralized veins historically mined. Further, please see Master Response 7 – Location of Future Mining Areas. As discussed therein, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps

A101, A201 and A202), and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft.

The commenter believes that the project should be evaluated by comparison to other massive extraction projects in populated areas which have failed. The commenter does not provide any information on these other extraction projects. The commenter believes the DEIR should provide evidence by example that no residential area has been rendered unhabitable by similar projects. The Idaho-Maryland Mine and the adjacent Empire and Northstar mines were previously in production and closed around 1956. Residential zones in the areas surrounding these mines have been inhabited during and after these historic operations. The DEIR evaluates impacts from the actual activities proposed by the project in accordance with CEQA. A comparison to other projects would not achieve the goal and purpose of the DEIR.

Response to Comment Ind 353-5

The commenter asserts that until an ADMP is approved, that air quality impacts from asbestos must be considered significant and unavoidable. However, CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

The commenter believes that all asbestos fibers present in rock can be fully liberated from dust particles. The commenter is incorrect and appears not to understand the nature of naturally occurring asbestos fibers, which are part of the mineral composition of certain rocks. While the air quality analysis assumes a conservative level of asbestos fiber liberation into air (see Master Response 22 – Conservatism used for Asbestos Assessment), most asbestos fibers present in rocks would not be liberated from either the rock or dust particles created from the rocks and would not be counted as asbestos in an air sample because they have no effect on human health.

The commenter believes that asbestos fibers are too small to de detected to ensure compliance with the approved ADMP. However, the procedures for air monitoring for asbestos are specified by California regulations and require the use of procedures developed by the US EPA. These procedures have been developed to ensure the protection of the public health from naturally occurring asbestos fibers. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

Response to Comment Ind 353-6

TEM measurements are converted to PCM equivalent units in order to calculate health risk. Conversion factors and cancer potency factors are provided in OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California. The health risk associated with asbestos exposure from the project, as presented in the DEIR, was based on the OEHHA guidelines.

Response to Comment Ind 353-7

Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]). The NSAQMD may revise the ADMP on the basis of air monitoring. The NSAQMD is responsible for approval and enforcement of the ADMP. The NSAQMD is responsible for providing the resources/manpower (such as Air Pollution Control Officers) in order to fulfill its regulatory role. Compromised enforcement is a speculative assertion without justification provided. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment regarding compromised enforcement amounts to speculation, no further response is necessary.

Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Ind 353-8

The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM_{10}) is liberated and would be counted as 1 structure in a given airmass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. This is the most conservative assumption possible and overstates calculated health risk. A refinement of the relationship between asbestos found in rock samples and how much becomes airborne is therefore unnecessary for the analysis of the DEIR. Please see Master Response – Conservatism of Asbestos Assumptions.

Response to Comment Ind 353-9

Samples from various lithologies at the Idaho-Maryland Mine Project were selected for asbestos testing. Sampling was based on lithologies where mining could take place and not on percentages of drill holes completed during exploration. As stated on page 7 of the ASUR Plan, Rise completed 19 exploration drill holes, totalling 67,500 feet of drilling, from 2017 to 2019. Forty-two (42) samples, mainly from diamond drill core from various lithologies at the Idaho-Maryland Mine Project, were submitted for asbestos testing in 2019. PLM testing was done on forty samples and TEM testing was done on two samples. In 2021, Rise requested the 40 samples previously submitted (and analyzed by PLM) to be reanalyzed using the TEM method. The location of exploration samples tested for asbestos are shown on sheets 1-3 of the ASUR Plan; sample name, drill hole, downhole depths, sample interval, rock type, and test results are provided in the appendix of the ASUR Plan (Appendix E.2 of the DEIR).

Prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing. These

same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the DEIR). Please also refer to Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 353-10

Please see Response to Comment Ind 353-9.

Response to Comment Ind 353-11

The asbestos content in rock is related to lithology and not proximity. Please see Response to Comment Ind 353-9 regarding sampling for naturally occurring asbestos. Naturally occurring asbestos (chrysotile) has been found in serpentinite and the management of this material will be required as discussed in the DEIR and ASUR Plan. Serpentinite is not a favorable host rock for gold mineralization and therefore a significant amount of serpentinite is not expected to be mined. Certain historic gold veins were hosted in serpentinite, which has altered to ankerite. This alteration process also alters chrysotile fibers into a non-asbestos mineral form. Very little asbestos is present in historic mine tailings derived from millions of tons of historic mining, including veins hosted in ankeritized serpentine. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 353-12

Asbestos by Polarized Light Microscopy (PLM) cannot be directly compared to Transmission Electron Microscopy (TEM) or Phase Contrast Microscopy (PCM) results. The OEHHA Guidelines provide a conversion of TEM structures to PCM equivalent fibers and from PCM fibers to PCM weight percent.

The use of PLM is required to comply with the Asbestos ATCM for Surfacing. This ATCM is designed to protect the public from exposure to asbestos from materials used for Surfacing. The use of TEM testing is required in order to calculate health risk in accordance with OEHHA guidelines.

PLM and TEM testing serve different purposes and are appropriately used for those different purposes in the analysis of the DEIR.

TEM measurements are converted to PCM equivalent units in order to calculate health risk. Conversion factors and cancer potency factors are provided in OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C. OEHHA is the lead state agency for the assessment of health risks posed by environmental contaminants in California. These conversions are provided in footnotes and references of the Air Quality Technical Report (Appendix E.1 of the DEIR).

Response to Comment Ind 353-13

The commenter is referring to a draft version of the ASUR plan which is not included in the DEIR. Please see Appendix E.2 of the DEIR.

Page 4.3-61 of the DEIR has been modified in the Final EIR as follows:

> The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to ~~exclude~~ minimize asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced as part of the project.

The above change is for clarification purposes and comports with the language in the ASUR Plan (see Appendix E.2 to the DEIR).

Asbestos Containing Material is material with detectable asbestos using Polarized Light Microscopy (PLM). This material will not be used for Surfacing. If planned mining is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass of equivalent PCM units, gold mineralization will not be mined and barren rock will either not be mined or mined using a dust collection system and materials disposed underground (see page 9 of the Appendix E.2).

The commenter asks if detection of asbestos in rock would result in useless gold ore or barren rock. The purpose of the ASUR Plan is to manage mined materials to ensure public health risk from asbestos is minimized in compliance with the ADMP required by Mitigation Measure 4.3-2. If gold ore or barren rock contains asbestos that would potentially result in non-compliance with the ADMP, it would be managed in a manner as described in the ASUR plan, as discussed above.

The commenter asks if there is still enough rock to warrant mining given the restrictions of the ADMP and management procedures to comply with the ADMP outlined in the ASUR Plan. The assumed asbestos content in materials used for the purpose of health risk assessment, using the maximum allowable content in rock for the ASUR Plan, are much greater than actual content of asbestos in materials based on sampling of drill core and historic mine tailings. Please see Master Response 22 – Conservatism used for Asbestos Assessment. Therefore, it is expected that the measures required by the ADMP will not appreciably impact future production of the proposed mining operations.

The commenter states that the DEIR cannot be approved until the operational plans discussed in the ASUR Plan are completed and incorporated into the DEIR. Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP. The details of applicant operational plans are not required to be completed for the approval of the DEIR because they are only indirectly related to the ADMP, which is required by Mitigation Measure 4.3-2, and this mitigation measure ensures that potential health impacts to the public from naturally occurring asbestos would be less than significant after mitigation. Further, CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.)

Response to Comment Ind 353-14

The Health Risk Assessment for the project assumes that every asbestos structure present in dust (coarse particulate matter, PM_{10}) is liberated and would be counted as 1 structure in a given airmass. This is a very conservative assumption as a large proportion of asbestos structures would not be liberated and would be enclosed in dust particles. This is the most conservative assumption possible and overstates calculated health risk. Please see Master Response 22 – Conservatism used for Asbestos Assessment. Although the Health Risk Assessment prepared for the project is conservative, the analysis does not preclude the NSAQMD from requiring air monitoring, as detailed in Mitigation Measure 4.3-2 of the DEIR.

Response to Comment Ind 353-15

Please see Responses to Comments Ind 353-1 through Ind 353-14. The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the DEIR. For that reason, the County provides no further response to this comment.

Response to Comment Ind 353-16

The commenter provides a definition for "mineralization" from a google search online[1], which refers to vermicomposting and soil mineralization, as set for the below:

> Mineralization is the process by which chemicals present in organic matter are decomposed or oxidized into easily available forms to plants. Transformation of organic molecules in soil is mainly driven by its microbiota such as fungi and bacteria along with earthworms.

The project is a mining project and the definition of mineralization provided by the commenter, related to composting, is not a conventional definition of mineralization and is not relevant to the analysis.

A conventional[2] definition of a mineral is as follows:

1) Ore
2) An inorganic substance
3) Something neither animal or vegetable
4) A solid homogenous crystalline chemical element or compound that result from the inorganic processes of nature.

The term mineralization or mineralized rock in the DEIR refers to vein materials ("ore") which contain gold and sulphide minerals such as pyrite hosted and adjacent to quartz veins. These sulphide minerals are extracted from the rock during mineral processing by flotation (see page 3-25 of the DEIR). The sale of the resulting sulphide concentrate removes the majority of sulphide minerals that could potentially cause environmental concerns (see page 4.8-46 of the DEIR). Mineral processing does not remove asbestos fiber from rock because asbestos fibers are not sulphide minerals which can be separated by the flotation process. Asbestos emissions are mitigated through the required Asbestos Dust Mitigation Plan and minimized through management of materials as described in the ASUR Plan.

Response to Comment Ind 353-17

The standard for the maximum allowable content of asbestos in rock mined is 0.01% by mass of PCM equivalent units (see page 4.3-61 of the DEIR). The Health Risk Assessment has shown the risk to the public is less than significant assuming this content of asbestos in rock. The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism used for Asbestos Assessment.

Response to Comment Ind 353-18

The commenter is referring to section (d)(3) of the Asbestos ATCM for Surfacing. Any person who sells, supplies, or offers for sale or supply restricted material for non-surfacing applications must provide with each sale or supply a written receipt containing the following statement:

> **"WARNING! This material may contain asbestos.** It is unlawful to use this material for surfacing or any application in which it would remain exposed and subject to possible

[1]https://www.sciencedirect.com/topics/engineering/mineralization#:~:text=Mineralization%20is%20the%20process%20by,along%20with%20earthworms%20%5B38%5D.
[2]https://www.merriam-webster.com/dictionary/mineral

> disturbances. Extreme care should be taken when handling this material to minimize the generation of dust."

Surfacing is defined in the Section (i)(26) of the ATCM as follows: **"Surfacing"** means the act of providing or creating a temporary or permanent covering for a surface used for pedestrians, motor vehicles, non-motor vehicles, decoration, landscaping, soil stabilization, or erosion control. Examples of surfaces include, but are not limited to, roads, road shoulders, streets, access roads, alleys, lanes, driveways, parking lots, playgrounds, trails, squares, plazas, and fairgrounds. For the purposes of this section, "surfacing" does not include creating a covering composed of asphalt concrete or portland cement concrete.

Paving with asphalt concrete or Portland cement concrete is not Surfacing as defined in the ATCM and therefore not illegal as the commenter states.

The project would not use Asbestos Containing Material for Surfacing (see page 4.3-61 of the DEIR).

Response to Comment Ind 353-19

The reference to Portola Valley is correct and refers to the so-named area within Plumas County, which is in the Mountain Counties Air Basin. See https://www.arb.ca.gov/desig/adm/2020/state_pm25.pdf?_ga=2.165607803.555060607.1660866051-1593822733.1612388870.

Response to Comment Ind 353-20

The text "TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter)" is taken directly (and reproduced exactly) from the OEHHA – Air Toxic Hot Spots Program – Risk Assessment Guidelines Appendix C.

Individual Letter 354

Ind 354-1

March 20, 2022

Dear Board Members -

I have enclosed a clipping stating another reason to NOT vote yes on reopening the mine. How could anyone with common sense, say the Nevada Co. Air Park is a small aircraft airport?

There are so many reasons - read letters to the editor - to not open this mine. Please do not open it - too many lives will be adversely affected - dry wells, poorer air quality, breathing issues for all etc. etc. etc. Think of your ~~the~~ grandchildren and what you are leaving them. A MESS! Jim & Kelli Bradshaw

Dist 1

Ind 354-2



A small aircraft airport, really?

OTHER VOICES
Ray Bryars

I'm gradually working my way through the Idaho-Maryland Mine project draft environmental report and can't believe the amount of misinformation that I am encountering.

The latest is in the Hazards and Hazardous Materials section, on page 4.7-10, under the heading of "Nearest Airports." The first paragraph states, "The closest public use airport to the project site is the Nevada County Air Park, a small aircraft airport, located east of Brunswick Road and north of Loma Rica Drive, less than one mile (approximately 4,000 feet) from the Brunswick Industrial Site."

By referencing "a small aircraft airport," it appears that there is an attempt to minimize the importance of the Nevada County Airport. There is no acknowledgment that this is a major base for the U.S. Forest Service and CalFire. The location places the airport 20 minutes from other airports, which during fire season provides robust coverage of Nevada County and adjacent counties.

The county website, mynevadacounty.com, has the following information regarding the airport:

"Nevada County Airport is home to the Forest Service and CalFire Grass Valley Air Attack Base. This center of wildland firefighting from the air is the permanent location for two Grumman S-2 air tankers that drop fire retardant, and two air attack aircraft that coordinate the efforts of the tankers and other firefighting assets and personnel. Aircraft from Nevada County Airport are on standby, ready to respond to fires throughout the foothills and mountains. When larger fires occur nearer to the airport, many other firefighting aircraft use the airport as a base for operations. Search and Rescue and med-evac aircraft also use the airport year-round for public safety missions."

In addition, I found the airport is used for law enforcement, business, transportation, tourism and education for youth through programs such as the Young Eagles Program.

It is shocking that Rise Gold ignores the huge positive benefit that the airport provides by stating that it is a "small aircraft airport."

Does Rise Grass Valley want to minimize the importance of the airport so that we will ignore the fact that they will be transporting and storing explosives within 4,000 feet of the airport and right under some of the flight paths?

In the fall of 2021 we had two potentially disastrous fires just below the airport, plus the River Fire just a few miles south. Imagine what it would have been like if the planes that were fighting these fires became grounded due to the possibility of explosives being ignited. Many of us witnessed the great job that the firefighters did and are very aware of the extremely brisk spread that was only brought under control by rapid action by many brave firefighters and the pilots from the Nevada County Airport.

It amazes me that Nevada County allows a penny stock speculator with his history of running away from the Banks Island Gold toxic spill in British Columbia, Canada, followed by declaring bankruptcy, can be allowed to hold hostage the residents of Grass Valley and Nevada County.

There must be a way to stop wasting everyone's time and put an end to the possibility of re-opening the Idaho-Maryland Mine forever. I implore our county supervisors to do the right thing for the community and end this whack-a-mole madness. The airport is vital to the safety, vitality and future of Nevada County.

Ray Bryars lives in Nevada City.

INDIVIDUAL LETTER 354: JIM AND HELEN BRADSHAW

Response to Comment Ind 354-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

In addition, as detailed on page 4.7-36 of the DEIR, the applicable threshold for the purpose of CEQA analysis in evaluating potential hazards impacts related to the project site's proximity to the Nevada County Air Park is whether the project would result in a safety hazard or excessive noise for people residing or working in the project area. As discussed therein, the project is not a noise-sensitive use, would not pose a hazard to flight, and would not exceed applicable density requirements; therefore, the DEIR concludes that a less-than-significant impact would occur.

Response to Comment Ind 354-2

The comment is a scanned copy of a local editorial, which the commenter has provided to support the sentiments expressed in Individual Letter 354. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 355

Dist 3

Nevada County Board of Supervisors
950 Maidu Ave., Suite 200
Nevada City, CA 95959

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller,Susan Hoek, and Hardy Bullock,

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

Ind 355-1

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease.

Ind 355-2

The noise and vibration from trucks and blasting will disturb my patient.

Ind 355-3

The diesel Fumes and heavy metal mine dust pollution are all dangerous to our health and businesses.

Ind 355-4

Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossmen of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial

Ind 355-5

gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for you dedication to Nevada County,

Jim Cunningham
800 Freeman Ln., Ste 307
Grass Valley, CA 95949
530-277-3936
jimacpt@sbcglobal.net

INDIVIDUAL LETTER 355: JIM CUNNINGHAM

Response to Comment Ind 355-1
Please see Master Responses 1, 14, 15, and 16.

The comment expresses a general opinion that the mitigation measures set forth in the DEIR require a "paltry" time period for addressing potential impacts associated with water levels, but does not provide specific examples that would allow for a detailed response. The DEIR evaluates the proposed project's potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin under Impact 4.8-2, which starts on page 4.8-54. Because the DEIR concludes that a significant impact could occur, Mitigation Measures 4.8-2(a) through 4.8-2(c) require that the Project Applicant implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc., as approved by the County, and install a network of monitoring wells. Should mining operations result in a significant impact to any wells, the mitigation set forth therein additionally requires that the Project Applicant provide a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, provide an immediate water supply until the source of the problem is determined and rectified. With incorporation of Mitigation Measures 4.8-2(a) through 4.8-2(c), the DEIR concludes that a less-than-significant impact would occur.

Response to Comment Ind 355-2
The commenter expresses general concerns regarding noise and vibration but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Noise and vibration are addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Response to Comment Ind 355-3
The commenter expresses general concerns regarding diesel fumes and heavy metal dust but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 18 and 20.

Response to Comment Ind 355-4
The commenter expresses general concerns regarding discharge into Wolf Creek but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 35.

Response to Comment Ind 355-5
Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 356

(no subject)

about:blank?compose

Nevada County Planning Commission
950 Maidu Ave., Suite 170
Nevada City, CA 95959

March 9th, 2022

To The Planning Commission:

Ind 356-1 I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within
Ind 356-2 the 80 years of their lease. The noise and vibration from trucks and blasting will disturb my patient.
Ind 356-3 The diesel Fumes and heavy metal mine dust pollution are all dangerous to our health and businesses.
Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream
Ind 356-4 channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossmen of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

Ind 356-5 My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for you dedication to Nevada County,

Jim Cunningham
800 Freeman Ln., Ste 307
Grass Valley, CA 95949
530-277-3936
jimacpt@sbcglobal.net

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

1 of 1

3/11/2022, 11:00 PM

INDIVIDUAL LETTER 356: JIM CUNNINGHAM

Response to Comment Ind 356-1
See Response to Comment Ind 355-1.

Response to Comment Ind 356-2
See Response to Comment Ind 355-2.

Response to Comment Ind 356-3
See Response to Comment Ind 355-3.

Response to Comment Ind 356-4
See Response to Comment Ind 355-4.

Response to Comment Ind 356-5
See Response to Comment Ind 355-5.

Individual Letter 357

Dist 3

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

clerk of the board
950 maidu avenue, ste. 200,
nevada city, ca 95959

members of the board of supervisors for nevada county,

Ind 357-1 i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more. but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that, thus i demand that you deny rise gold's application immediately.

i have expressed my discontent over this matter a number of times, and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity.' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this matter.

Ind 357-2 with profound displeasure,

jim haynes
113 winchester street
grass valley, ca 95945

13242 jeabjo street
nevada city, california 95959

INDIVIDUAL LETTER 357: JIM HAYNES

Response to Comment Ind 357-1

Please see Master Responses 1 and 3.

The comment expresses a general opinion that the proposed project would result in impacts related to water, land, air, and human health, but does not provide specific examples that would allow for a detailed response.

Response to Comment Ind 357-2

Please see Master Responses 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 358

mr. matt kelley
senior planner
nevada county planning department
950 maidu avenue, suite 170
nevada city, ca 95959-790

mr. kelley,

Ind 358-1 i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more. but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that, thus i demand that you deny rise gold's application immediately.

i have expressed my discontent over this matter a number of times, and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity.' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this.

Ind 358-2 with profound displeasure,

jim haynes
113 winchester street
grass valley, ca 95945

13242 jeabjo street
nevada city, california 95959

RECEIVED
FEB 23 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 358: JIM HAYNES

Response to Comment Ind 358-1
See Response to Comment Ind 357-1.

Response to Comment Ind 358-2
See Response to Comment Ind 357-2.

Individual Letter 359

From: Jim Haynes
To: BOS Public Comment
Subject: rise gold"s latest public relations deceit
Date: Tuesday, February 15, 2022 7:36:50 PM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 359-1

members of the board of supervisors for nevada county,

i am choking on my own rage here. so the time to be polite is over. the latest public relations document from rise gold is bullshit. complete bullshit. there is not a single truthful piece of information that they have printed on that paper. of course, in this day and age, spreading lies, disinformation, and bullshit is commonplace. and for the most part that bullshit just ruffles feathers, and little more. but this isn't about false existential threats on our 'freedom,' this is about poisoning our water, our land, our air. it's about cursing the people you claim to represent with cancer. fuck that. i refuse to accept that. thus i demand that you deny rise gold's application immediately.

Ind 359-2

i have expressed my discontent over this matter a number of times. and i gather this is just filed away. as such file this in the bin marked 'with extreme animosity.' if you do not have a bin, please create one; as i guarantee i will not be the last to voice my disgust with this matter.

with profound displeasure.

jim haynes
113 winchester street
grass valley, ca 95945

13242 jeabjo street
nevada city, california 95959

INDIVIDUAL LETTER 359: JIM HAYNES

Response to Comment Ind 359-1
See Response to Comment Ind 357-1.

Response to Comment Ind 359-2
See Response to Comment Ind 357-2.

Individual Letter 360

mr. matt kelley
senior planner
nevada county planning department
950 maidu avenue, suite 170
nevada city, ca 95959-790



dear mr. kelley,

Ind 360-1 we are writing once again to express our disapproval, nay disgust, with the consideration to re-open the idaho-maryland mine as proposed by the canadian mining firm rise gold. even before we had done our due diligence by studying the literature available on this proposed mine, we were against it. all our suspicions were confirmed that the impacts of the mine would be irreparable and extensive. this not only includes the toxicity from the tailings for which rise gold would self-

Ind 360-2 monitor, the impact of noise pollution on a corridor that will be even further impacted by the dorsey marketplace currently under construction, but also the immoral devastation caused by the dewatering of our land. it has been noted by numerous experts (including engineers at NID) that

Ind 360-3 the hydrology studies from the DEIR is insufficient and / or out of date, likely to be much worse than the paucity of information that was offered.

water seeks its own level. this is a phrase linked to hydrology though it has been appropriated within sociology. on the date that we write this letter, there has been zero precipitation for over 30 days in a time period that has historically been the wettest for this part of california. when the water is removed from a mine, the water from other sources will seep into this void. the DEIR's hydrology is insufficient in predicting the impacts of this and inadequate in offering mitigation. how can you in good conscious allow this proposal to continue as the climate change worsens the environmental conditions in which we live? no mitigation will offset the impacts that will be exacerbated by a needless mine. we need water. the fauna of california needs water. the forests need water. our

Ind 360-4 future needs water. throwing all of that away for a scant amount of jobs, promised by a disreputable company to a few people outside our community, is profoundly mistaken.

as our representatives in this matter, we demand that you immediately put a stop to this proposal. end it now, and end it forever.

yours in magnanimity,



jim and erika haynes
113 winchester street
grass valley, california 95945

13242 jeabjo street
nevada city, california 95959

INDIVIDUAL LETTER 360: JIM AND ERIKA HAYNES

Response to Comment Ind 360-1

Please see Master Response 1. The commenter expresses general concerns regarding toxicity from mine tailings but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 360-2

The commenter expresses general concerns regarding noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 360-3

Please see Master Responses 13, 14, and 15.

Response to Comment Ind 360-4

Please see Master Responses 1 and 13 through 16. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 361

From: Jim Morris
To: Idaho MMEIR
Subject: Idaho Maryland Mine Draft EIR
Date: Monday, April 4, 2022 4:17:02 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Nevada County Planning Commission,

Ind 361-1 I consider the groundwater hydrology studies in this Draft EIR to be woefully inadequate in addressing the potential impact on the local groundwater. The complexity of the groundwater hydrology in this geology cannot be understood with this level of study. I have worked as a Civil Engineer in California since 1983 in the field of Geotechnical Engineering.

James E. Morris, PE

10732 Willow Valley Rd.
Nevada City, CA 95959

INDIVIDUAL LETTER 361: JIM MORRIS

Response to Comment Ind 361-1

Please see Master Responses 13 through 16.

Individual Letter 362

DEIR Comments to Reopen the Idaho-Maryland Mine

April 3, 2022

Ind 362-1 My name is Jim Otto and I live at 14069 Diamond Court in Grass Valley which is located off East Bennett Road. I live directly on top of the Idaho-Maryland Mine workings. As a result, my wife and I are living at Ground Zero for this project. This is the third time in the past 30 years that we have had to fight for our water, air, and quality of life, due to a proposed reopening of the Idaho-Maryland Mine.

Ind 362-2 We own one of the 30 wells identified in the DEIR that is at high risk for dewatering. As such, the well mitigation plan is our biggest concern. It is inadequate for the following reasons:

Ind 362-3 The well mitigation plan calls for providing NID water to 30 properties along East Bennett Road. The problem is that the hydrogeology in the area is complex. There have been many dewatering studies conducted over the past 30 years, and the one clear conclusion is that nobody knows for certain what will happen to domestic wells when the mine is dewatered. As such, there is an unknown risk to well owners. There are approximately 500 wells within ½ mile of the mineral rights boundary. It's critically important that these wells be identified in the EIR so well owners can assess their risk of dewatering.

Ind 362-4 A well failure would be a catastrophic event for a homeowner. Without water a property is essentially worthless. Thirty properties will receive NID water, but the DEIR does not address what steps will be taken if a well fails that is outside that area. The applicant needs to define a service level agreement to provide immediate temporary water, as well as a permanent solution. The applicant should provide financial assurances (e.g. bonds) that they can provide NID water to all failed wells in the area in a timely manner.

Ind 362-5 The DEIR states that prior to dewatering, Rise Gold would offer 30 properties along East Bennett Road to be connected to NID (Page 3-36). "*If the property owner decides to connect to the potable water line, the project applicant would fund the permitting and construction costs*". If the homeowner decides to connect to the potable water line and does not want to abandon their well: Prior to dewatering, it needs to be setup so simply turning a valve will provide IMMEDIATE water to the home. Thus, avoiding ANY interruption of water supply, particularly on a weekend or holiday. Any NID required backflow device should be paid for by Rise Gold. If the property owner declines the original offer to connect to NID, and then their well fails after dewatering commences: Will Rise Gold still pay for NID permitting, construction costs, and all monthly fees? It should.

Ind 362-6 The DEIR section 4.8-2(c) states that "*the applicant will pay for all monthly NID charges until the property is sold or annexed by the city of Grass Valley*". Rise Gold should pay for all NID monthly charges for the lifetime of the project and regardless of whether the property sells. This section also states that Rise Gold would pay for up to 400 gallons of NID water per day. NID has stated that the average water use in the region is greater than 500 gallons per day. In addition, the DEIR states that NID water will be supplied by the smallest pipe that NID offers, consisting of 5/8". Our current well provides twice that amount of water. Thus, NID's larger 3/4" pipe should be used. Our current well water has been thoroughly tested and is pristine. NID adds Aluminum Sulfate and Sodium Hydroxide to its water. We have a large pond and waterfall that serves fish and wildlife that don't tolerate Chlorine. Therefore, Rise Gold should pay for water filtration systems to remove Aluminum, Sodium, and Chlorine. This all needs to be adjusted in the EIR.

Ind 362-7

Well owners face significant impacts related to the mine reopening. The EIR should include creating a Water Review Team that include representatives from Rise Gold, the County, and well owners. The Siskon Gold Project included community involvement around well issues. By all accounts this arrangement of the applicant, local government, and a community liaison was very effective in quickly addressing and resolving well issues.

Ind 362-8

A final issue related to mine dewatering is the potential to increase the risk of fire. The average rainfall in Grass Valley has decreased significantly in recent years. This has resulted in historic fire damage in Northern California. The DEIR does not adequately address the impact that dewatering will have on vegetation in the area. Any significant loss of water to vegetation would add to increased fire risk at a time when the area has experienced several years of historically destructive fires. The EIR must address how soil moisture in the area will be monitored, before and after dewatering.

Ind 362-9

Another major concern with the DEIR is vibration resulting from underground blasting operations. Page 3-20 of the DEIR says that Rise plans to use 0.93 tons (1860 lbs.) of explosives and 257 detonators per day. This is approximately 40% of the explosive power of the 1995 Oklahoma City bombing. Page 2-97 discusses the Vibration Monitoring program. The monitoring will be conducted at the Brunswick site. The problem is that blasting may occur directly under homes along East Bennett Road and within 500' of the surface. Monitoring needs to be added to residential areas where blasting is occurring. Also, there is no mention of how homeowners may report unacceptable levels of blast vibration to Rise or the County. There needs to be a way to report these disturbances and a method for modifying the blasting plan down to an undetectable level.

Ind 362-10

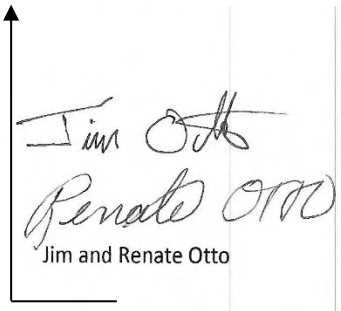
We live 1/3 of a mile from the Brunswick surface site, so noise is a big concern. The Summary of Long-term Noise Monitoring (Table 4.10-1) is grossly inadequate. Of the 12 noise monitoring sites, the maximum "long-term" monitoring duration was 5 consecutive days. Worse, site #5 only had two days of monitoring, and site #12 only had one day. There are simply not enough data points. A minimum long-term study should be 90 days. This would reveal an honest noise pattern of the area. The DEIR does not address the process for reporting noise issues. Is it the County's job? If so, which department? What is the process for report a noise issue? This should be addressed in the EIR.

Ind 362-11

Finally, the DEIR does not adequately address damage to local roads caused by truck traffic. Page 4.7-37 states that there will be up to 100 truckloads of engineered fill per day. Each truckload will carry 20 tons of fill, and this could continue for 80 years. This will cause excessive road damage between the Brunswick and Centennial sites. The DEIR does not address the annual road maintenance costs from truck traffic. Since the applicant will cause significant road damage, they should help fund road repairs. Every winter cars slide off the top of the Brunswick grade. How will large trucks avoid doing the same? These should be added to the EIR.

Ind 362-12

Historic gold mining in Nevada County was an environmental disaster that we are still battling. Will reopening the Idaho-Maryland Mine add to that legacy? This project has several very significant environment impacts. Essentially, Rise Gold is proposing operating a gold mine in a residential area. This is unprecedented in California. It is critical that Nevada County thoroughly analyze the correct mix of mitigation measures to protect the environment and residents. But more importantly, the County needs to take a long, hard look at this project and decide if the benefits truly outweigh the risks.


Jim and Renate Otto

INDIVIDUAL LETTER 362: JIM AND RENATE OTTO

Response to Comment Ind 362-1
The commenters opposition to the project is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 362-2
The commenter asserts that the well mitigation plan is inadequate but does not provide specifics in this comment. Please see the following responses to more detailed comments.

Response to Comment Ind 362-3
The commenter asserts that the DEIR should identify wells within ½ mile of the mineral rights area; however, significant impacts to water supply are not anticipated this far from the project site. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 362-4
General Plan Policy 17.12 and Mitigation Measure 4.8-2(b) already requires that the mine operator immediately replace water supply for wells where water supply or water quality issues occur due to the mine. Under General Plan Policy 17.12, the burden is on the mine operator to prove that the mine did not cause the water supply/quality issue, so this policy is protective of well owners. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 362-5
The Well Mitigation Plan (Appendix K.9 of the DEIR) specifies that water meters will be installed at the property line and that the water meter would be connected to the house if requested and authorized by the property owner. Therefore, NID potable water would be available at any time unless a property owner refused authorization for this connection. The Well Mitigation plan has been revised to include the installation of Double Check Valves (see Appendix D to this Final EIR). If a property owner decides to retain and continue using their water well, the cost of the well's operation, including Double Check Valve monthly fees, would be the owner's responsibility and not the applicant's. All NID permitting, construction costs, and monthly fees would be funded by the applicant as described in the Well Mitigation Plan.

Response to Comment Ind 362-6
Regarding annexation or sale of a property, please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The single-family home unit demand factor of 0.36 acre-feet per year per connection is used by NID for projecting demands. (Page 18 of the NID 2020 Urban Water Management Plan). This is

equivalent to 321 gallons per day. The well mitigation plan proposes compensation of up to 400 gallons per day or approximately 25% more than NID's estimate of demand for a single-family home. The water supply assessment uses a higher water consumption figure as a conservative measure to ensure adequate water supply; but this is not the appropriate figure to use for the well mitigation plan. A 5/8" water meter is sufficient to provide this capacity of water and is used by over 75% of NID treated water accounts (see Table 1 of NID capacity charge update available at https://www.nidwater.com/files/0795f5c27/NIDCapacityChargeUpdate-2-12-14.pdf)

The commenter states that water quality of NID potable water is lower than the water quality from domestic water wells but provides no evidence to support this statement. Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See NID water quality report at https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf.

Response to Comment Ind 362-7

The comment does not address the adequacy of the DEIR. Nevada County Environmental Health will have review and oversight authority regarding prospective well impacts, as outlined in Mitigation Measure 4.8-2. The comment is noted and will be provided to County decisionmakers for their consideration.

Response to Comment Ind 362-8

As stated on page 4.13-21 of the DEIR, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels. Please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 362-9

Mitigation Measure 4.10-4 requires ground vibration monitoring at nearby residences. The threshold of significance for blasting vibrations has been determined as 0.4 in/s. Please see Chapter 4.10 and Appendix M of the DEIR. The results of the ground monitoring vibration monitoring program shall be submitted to the Nevada County Planning Department for review, as required in Mitigation Measure 4.10-4. The Nevada County Code Compliance Division manages and investigates complaints, including complaints related to blasting. Please see Master Response 7 – Location of Future Mining Areas, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 362-10

Please see Responses to Comments Ind 617-3 and Ind 617-4 regarding ambient noise measurements.

Mitigation Measure 4-10-3 requires a comprehensive noise monitoring program to be conducted for each facet of the operation to both verify the modelling assumptions of the project's noise analysis and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant.

The Nevada County Code Compliance Division manages and investigates complaints, including noise-related complaints. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Ind 362-11

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

As stated on page 4.12-89 of the DEIR, TJKM's peer review also notes the presence of "ICY" signs on Brunswick Road, north of the Brunswick Industrial Site, which implies difficult traffic conditions during periods of inclement weather. As mentioned above, this portion of Brunswick Road is already regularly used by heavy-duty haul trucks. An approximate length of just over 900 feet exists from the crest of the hill on Brunswick Road to its down grade intersection with Loma Rica Drive. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather. Mitigation Measure 4.12-6(f) requires that prior to commencement of operations, the Project Applicant shall obtain an encroachment permit from Nevada County and install: 1) W51 "Slow Trucks" road sign along Brunswick Road, about 500 feet north of the E. Bennett Road intersection; 2) A second sign shall be installed at the applicant's expense just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.

Response to Comment Ind 362-12

The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 363

From: WAHLER ENTERPRISES
To: Planning; jim.wahler
Subject: Idaho-Maryland Mine Impact, comments by Jim Wahler, former City Planner///Fwd: Updated Notice of Availability of a Draft Environmental Impact Report and Notice of Re-Scheduled Public Meeting to provide Comments on the Idaho-Maryland Mine Draft EIR
Date: Monday, February 7, 2022 4:07:55 PM
Attachments: image001.jpg
Idaho Maryland Mine NOA Comment Period Extension Final.pdf

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 363-1 Attention Matt Kelley,
I was a city planner for Lake County, Illinois from 1970-1973. During that time we were doing a lot of land use reports for that area.

Ind 363-2 I can tell you that a project of this kind, the Idaho-Maryland Mine operation would never have been allowed, considering the air, water, and noise factors to the community.

Ind 363-3 And looking at the track record of the developer, not being able to clean up the mess from other projects that he has done, that in itself would not even warranted his consideration to attempt it in an community as large as Grass Valley/Nevada City.

Ind 363-4 **It would be a tragedy to this area, a hugh mistake, I would say catastrophic!!!**

I sincerely hope you can exercise your natural sense of planning ethics while making any decisions.

Sincerely,
Jim Wahler, Former City Planner

---------- Original Message ----------
From: Idaho MMEIR <Idaho.MMEIR@co.nevada.ca.us>
To:
Cc: Matt Kelley <Matt.Kelley@co.nevada.ca.us>
Date: 02/07/2022 12:56 PM
Subject: Updated Notice of Availability of a Draft Environmental Impact Report and Notice of Re-Scheduled Public Meeting to provide Comments on the Idaho-Maryland Mine Draft EIR

Good Afternoon:

Attached please find a copy of an updated Notice of Availability for a Draft Environmental Impact Report and a Notice of Re-Scheduled Special Public Meeting to provide comments on the Idaho-Maryland Mine Project EIR. This notice is to announce that the public comment period has been extended until Monday, April 4, 2022 at 5:00 p.m. to allow the public a total of 91 days to submit comments. This notice is to also announce that the Special Public Meeting before the Nevada County Planning Commission has been re-scheduled to March 24, 2022. The comment period has been extended due to the Winter Storm events in late December into January, which caused Nevada County residents to lose utility power and internet capabilities for an extended period of time

For more information, please see the attached revised Notice of Availability.

The Draft Environmental Impact Report and other project materials continue to be available for public review and comments on the Nevada County website at: https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley

A printed copy of the Draft EIR is available for public review at the following locations during normal business hours. Due to the COVID-19 pandemic, the Planning Department highly recommends scheduling an appointment ahead of time to review the Draft EIR.

- Nevada County Planning Department, 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 – (530) 265-1222, Option 2.

As a courtesy for public review, a printed copy of the Draft EIR with available Technical Appendices in

electronic format **may** be available for public review at the following library locations, **during normal**

business hours and by appointment only. Please contact the individual library below for information on appointment availability.

- Madelyn Helling Library, 980 Helling Way, Nevada City, CA 95959 – (530) 265-7078
- Grass Valley Library, Royce Branch, 207 Mill Street, Grass Valley, CA 95945 – (530) 470-2692
- Penn Valley Library, 11252 Pleasant Valley Road, Penn Valley, CA 95946 – (530) 388-8830
- Truckee Library, 10031 Levon Avenue, Truckee, CA 96161 – (530) 582-7819

A Special Public Meeting before the Nevada County Planning Commission will be held on March 24, 2022, beginning at 9:30 a.m. in the Board of Supervisors Chambers at the Eric Rood Administration Center, 950 Maidu Avenue, First Floor, Nevada City, CA 95959 to receive comments from public agencies and the public on the adequacy of the Draft EIR. Future notice of public hearings will be provided in accordance with Nevada County noticing requirements.

In adherence with Governor Gavin Newsom's Executive Order, and the Nevada County Public Health Officer's Order, pertaining to the convening of public meetings in response to the COVID-19 pandemic, please see the March 24, 2022, agenda after posting for the most updated information regarding the meeting format, as well as the various options being made available for public agencies and members of the general public to provide public comment. If there continues to be a high rate of COVID-19 spread within our community, the Planning Commission may attend the meeting and participate remotely to the same extent as if they were present.

For information on how to participate in the Special Meeting, please see the Agenda, which will be available at least five (5) days before the meeting at: https://www.mynevadacounty.com/AgendaCenter/Planning-Commission-10

Seven (7) days prior to the Special Public Meeting, all documents pertaining to the proposed actions, Staff Reports and other supporting documents will be available for public review and consideration at the Nevada County Planning Department, 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 or can be found online at: https://www.mynevadacounty.com/517/Projects-Scheduled-for-Public-Meeting.

Thank you.

Matt Kelley

Senior Planner

Planning Department

County of Nevada

Community Development Agency

950 Maidu Ave. Suite 170 *office 530.265-1423*

PO Box 599002 *https://www.mynevadacounty.com/512/Planning-Department*

Nevada City, CA 95959-7902

This message is for the designated recipient only and MAY CONTAIN PRIVILEGED OR CONFIDENTIAL INFORMATION. If you have received it in error, please notify the sender immediately and delete the original. Any other use of this E-mail is prohibited.

I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4….

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

INDIVIDUAL LETTER 363: JIM WAHLER

Response to Comment Ind 363-1
The comment is an introductory statement and does not address the adequacy of the DEIR.

Response to Comment Ind 363-2
The commenter expresses general concerns regarding air, water, and noise but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 363-3
Please see Master Response 3.

Response to Comment Ind 363-4
Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 364

From: Jim Wahler <jimawahler@comcast.net>
Sent: Saturday, April 2, 2022 12:04 PM
To: Idaho MMEIR; jim wahler
Subject: From Jim Wahler, former City Planner, of Lake County, Illinois.

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Hello To County of Nevada,

My name is Jim Wahler. I was a City Planner for Lake County, Illinois, just north of Cook County in the Chicago area 50 years ago. The make up of Lake County was not unlike the density of Nevada County.

I was involved with developing a Land Use Plan for the county. It took 2 1/2 years to come up with our recommendations.

Ind 364-1

I assure you, if this kind of mine development were to be initiated in Lake County then or any other time since, it would never have made it to any type of stage 2 development.

The 10 points outlined by the CEA foundation are completely true and accurate.

Voting yes for this mine, would be a catastrophic decision for the future of Nevada County.

If you do any research on where other gold mines are, **say in the state of Nevada,** you will find that not only is the density of population far less, the actual mining takes place 50-100 miles away from even any small town population.

Ind 364-2

Anyone who would vote yes on this mine, knowing the potential suicide it would bring to Nevada County air and water and energy usage, would be making a decision that would literally destroy this area for living safely for, not only the next 80 years, but probably FOREVER!!!

1

I can't imagine who would vote yes on this mine and for what reason. **No amount of money could compensate** for the amount of irreversible damage that would occur for Nevada County and All its residents.

I could go on but **what really is necessary is for the decision makers to wake up to the truth** of the destructiveness of a gold mining operation in the back yard of a population that would be devastated for the rest of there lives and for generations to come.

You can reach me at 530-274-2416.

Sincerely,

Jim Wahler, resident of Grass Valley

Ind 364-3

2

INDIVIDUAL LETTER 364: JIM WAHLER

Response to Comment Ind 364-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 364-2

The commenter expresses general concerns regarding air, water, and energy but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Response to Comment Ind 364-3

Please see Master Response 1.

Individual Letter 365

RST Engineering

13993 Downwind Court
Grass Valley CA 95945
530.272.2203 voice only
www.rstengineering.com

24 March 2022

The Honorable NevadaCounty Planning Commissioners
950 Maidu Ave
Nevada City CA 95959

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

REF: DEIR, Dec 2021, Idaho Maryland Mine Project

Commissioners:

QUALIFICATIONS (in date order):

BA Semiconductor Physics, San Diego State University. Commercial Pilot, Flight Instructor, Airframe & Powerplant Mechanic with Inspection Authorization. Electronic Design Engineer, Surveyor & Apollo Moon projects, Viking Mars Soft Lander. Antenna & Instrumentation Designer on Voyager Earth Circumnavigation program, For the last 46 years the electronic and mechanical designer of FAA and FCC approved and installed electronic and mechanical apparatus for my own company at Nevada County Airport and distributed around the world. FCC approved type acceptance engineer.

Ind 365-1

Resident 46 years at the same location in Nevada County, roughly half a mile out Greenhorn from Brunswick and halfway between Brunswick and Loma Rica. Between half a mile and two miles from the current project surface sites.

43 years on the Sierra College faculty in the Electronic Technology/Computer Aided Design/ and Mechatronics programs at Rocklin, Grass Valley, and Truckee campuses. VP of the SC Faculty Association (2000-2014), Elected to the California Teachers Association State Council. Elected to the National Education Association Representative Assembly.

8 years on the Nevada County Board of Supervisors (District III) having dealt with dozens of these EIRs and projects including other gold mine proposals.

DISCUSSION #1.

In the call for preliminary comments (DEIR page 1-13), the concern was voiced (page 1-13) for the potential of sink holes. Sink holes are not uncommon where mining operations have taken place. No mining operation that I have ever studied could re-fill an underlying rock support system anywhere as good as Mother Nature did it several million years ago.

Ind 365-2

There has been zero response in the DEIR to this comment.

And what happens when a sink hold suddenly appears on a Nevada County Airport runway after the staff has gone home? Dark of night? As a flight instructor of several thousand hours, I can tell you that an aircraft landing light does little but find you the location of the runway and PERHAPS a deer or two on the runway. It certainly will NOT find you sink holes. I see no mitigation or even a nod to the possibility.

As the survivor of three aircraft forced landings, I can tell you that handling the emergency during the day is difficult. At night it is a gamble at best. The odds of an aircraft (and passengers) surviving a sink hole landing at night without injury is somewhere between zero and zip.

DISCUSSION #2

In the call for preliminary comments (DEIR page 1-14) the concern was voiced (page 1-14) for airborne particulate matter (smoke, dust, grindings, etc.) contamination of Nevada County aircraft engine air filters to become contaminated to the point of engine failure when passing over the proposed project.

There has been zero response in the DEiR to this comment.

Ind 365-3

This is my 55th year in aviation maintenance. When the engine stops breathing, the engine stops turning. When the engine stops turning the propeller stops turning. The propeller is only there to keep the pilot cool, because when it stops, (s)he starts sweating like you cannot believe.

You cannot accept in the final EIR that there will not be any airborne particulates, and yet the proponent has not shown any data on particulate matter and the distribution of it around the site.

Just as a side matter, when I get an airplane in the maintenance hangar to inspect, I can tell from the air filter contaminants where the airplane is based. Gray, black, yellow, or brown, they are all representative of the pollution in the area where they are from. I'd prefer not to have a Nevada County contaminant signature.

DISCUSSION #3

My apologies. I never considered blasting when I thought about aircraft. And, since the DEIR has concentrated its responses on domestic housing effects, I thought you should consider the effect of blasting on stationary aircraft at Nevada County Airport

Ind 365-4

As I stated above, I have been designing aircraft electronic devices for a very long time. And, the FAA has given us guidance on shock and how we had to design our devices to handle it. I see nothing in the DEIR about the hundred or so aircraft populating Nevada County Airport and how they or cannot resist the shock of blasting.

We in the aviation electronics ("avionics") industry have been guided for dozens of years by documents produced by RTCA for the tests our devices should undergo for blasting and vibration. I have absolutely no idea whether or not the DEIR considered these criteria.

Just for their information, I include reference to RTCA document DO-138 (as amended and superseded) as the basis for this discussion.

Thank you for your time

Jim Weir
RST VP Engineering
Nevada County Supervisor III (Retired)

INDIVIDUAL LETTER 365: JIM WEIR

Response to Comment Ind 365-1
The commenter provides a summary of their background. The comment is noted.

Response to Comment Ind 365-2
The commenter is concerned that the project will cause a sinkhole at the Nevada County Airport and the commenter states the DEIR fails to address the possibility at the airport. The project will not cause sinkholes in the airport runway. Near surface workings and subsidence are analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR. The commenter is referred to Master Response 7 - Location of Future Mining Areas, and Master Response 29 - Near Surface Workings.

Response to Comment Ind 365-3
The commenter states that the DEIR fails to analyze air quality impacts, specifically particulate matter. The DEIR analyzed particulate emissions in Chapter 4.3 and found the impacts to be less than significant after mitigation. (DEIR, p. 4.3-66.) The commenter is also referred to Master Response 18 - Air Quality Thresholds. Further, as stated on page 4.3-81 of the DEIR:

> The project would be required to comply with NSAQMD Rule 207, Particulate Matter, and would implement APM-AQ-2, Surface Fugitive Dust Controls, which would limit the amount of dust generated during project implementation. By reducing the generation of fugitive dust through compliance with the foregoing NSAQMD rules and APM-AQ-2, emissions of PM_{10} would be reduced to the maximum extent practicable and receptors would not be exposed to excess pollutant concentrations.

In addition, Mitigation Measure 4.3-2 states in part:

> *For all earthmoving activities, at least one of the following methods of dust control shall be implemented, pursuant to (e)(4)(E) of the ATCM:*
>
> *a. Pre-wetting the ground to the depth of anticipated cuts; and/or*
>
> *b. Suspending grading operations when visible dust emissions from any aspect of the grading (including tires, fans, and exhaust) cross the property line.*

Contrary to the commenter's speculation, there is no evidence that the mine's operation would generate substantial airborne particulate matter.

Response to Comment Ind 365-4
The commenter states that the underground blasting will damage aviation electronics at the Nevada County Airport. The DEIR analyzed the impact of blasting vibrations on sensitive electronic equipment at Analog Devices, which is much closer to the proposed mining activities than the Nevada County Airport. Underground blasting associated with the project would result in a less than significant vibration-related impact to Analog Devices. (DEIR, p. 4.10-55.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas.

Individual Letter 366

From: Jimena Saravia <energylifedesign@yahoo.com>
Sent: Monday, April 4, 2022 11:06 AM
To: Idaho MMEIR
Subject: DEIR comments

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Ind 366-1

I am a local resident who would be downwind from the Idaho-Maryland mine. Please don't approve this project. We cannot trust the government to do what's in our best interest. It's abhorrent that this is even being considered in the name of profit. I moved away from Oakland because of my asthma. I am so incredibly opposed to this project. Help us in keeping our air and water clean.

Thank you,
Jimena Saravia

INDIVIDUAL LETTER 366: JIMENA SARAVIA

Response to Comment Ind 366-1

Please see Master Response 1. The commenter expresses general concerns regarding air and water but does not specifically address the adequacy of the DEIR.

Individual Letter 367

From: Joan Goddard <joango@icloud.com>
Sent: Thursday, March 31, 2022 3:49 PM
To: Idaho MMEIR
Subject: EIR lacking

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Ind 367-1

Mining was Nevada County's past but it should not be our future! We all live in a beautiful rural community which has become a tourist destination enjoyed by visitors and citizens alike. We want to protect the precious resources we have so that our children and their children can thrive here.

The EIR is faulty; the company wanting to exploit the land is sketchy and putting out misinformation in glossy brochures; and worst of all, we are experiencing historic drought and accompanying fires. Our air pollution in this area is much too high and will only be exacerbated by the mining.

There has been so much information put out by knowledgeable people on the risks and uncertainties. I only hope those of you considering "what is best for the community" will not cave in to false promises and pipe dreams.

Joan Goddard
30-year resident
Co-founder of Conflict Resolution Center Co-founder of Sierra Foothill Village
20 years on the Board of InConcert Sierra Local psychotherapist in private practice

Sent from my iPad

INDIVIDUAL LETTER 367: JOAN GODDARD

Response to Comment Ind 367-1

Please see Master Responses 1 and 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR.

Individual Letter 368

From: Joan Reynolds Griffin
To: Idaho MMEIR
Subject: Fw: Proposed mine
Date: Saturday, March 19, 2022 9:25:33 AM

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Sent from the all new AOL app for iOS

Begin forwarded message:

On Friday, March 18, 2022, 6:21 PM, Joan Reynolds Griffin <jreynoldsbotany@aol.com> wrote:

Dear Matt Kelley,

Ind 368-1 I am a resident of Nevada City, a botanist, and I have worked for the gold mining industry in Nevada and California for over 30 years. Although my utmost concern about the proposed mining venture at the Idaho Maryland mine site is the amount of water that will be used for the mining venture, I also know from experience that the area will be impacted beyond repair regardless of what bonds or reclamation requirements are implemented.

Ind 368-2 During my career as a field botanist for many mines throughout Nevada, I performed both pre-mining botanical surveys to search for botanical resources for environmental documentation, as well as reclamation monitoring for post mining rehabilitation. The amount of environmental damage that consistently occurs during the gold mining ventures never recovers the landscape to the level prior to the ventures to mine for gold. It is an environmental tragedy which typically enables a few to receive capital gain, most of which are from another country. The local economic gain is always short if at all, and the people who see the economic benefits do not contribute to the local economy. The resource demands and damage far out way the benefits to the local area, community and environment.

Ind 368-3 The traffic, noise, air quality impacts are also huge concerns for the residents who reside near the proposed mine location, not to mention the potential for the water table to drop and impact wells throughout the area. Our people in our community need all the water we have, especially during these intense drought and climate change conditions.

Please stop the mining proposal in its tracks for the Idaho Maryland Mine.

Thank you.
Sincerely,
Joan Griffin
14201 Idaho Maryland Road
Nevada City, CA. 95959

INDIVIDUAL LETTER 368: JOAN GRIFFIN

Response to Comment Ind 368-1

Please see Master Response 1 and the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 368-2

Please see Master Responses 2 and 3.

Response to Comment Ind 368-3

The commenter expresses general concerns regarding traffic, noise, and air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 369

From: Dovetail Services
To: Julie Patterson-Hunter
Subject: Re: Let the people vote
Date: Wednesday, January 26, 2022 10:24:24 AM
Importance: High

Hi Julie,

My message was this:

Please, the mine is too big an issue for a few people to decide. At least send it to a local popular vote.

Ind 369-1

Best,
Joan Keyes & Jonathan Peck

Dovetail Publishing Services
11159 Alpine Lane
Grass Valley, CA 95945
530-272-1990 phone
530-272-8300 fax

On Jan 26, 2022, at 9:45 AM, Julie Patterson-Hunter <Julie.Patterson-Hunter@co.nevada.ca.us> wrote:

Good Morning -
I received your email, but I am unable to open links and/or attachments from unknown sources.
If you could send me the information in a manner that is not linked or attached I will be able to provide it to the Board members.
Thank you,

Julie Patterson Hunter, CCB
Clerk of the Board

-----Original Message-----
From: Dovetail Services <jk-jp@dovetailpublishingservices.com>
Sent: Tuesday, January 25, 2022 10:46 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: Let the people vote

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INDIVIDUAL LETTER 369: JOAN KEYES AND JONATHAN PECK

Response to Comment Ind 369-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 370

From: Dovetail Services <jk-jp@dovetailpublishingservices.com>
Sent: Wednesday, January 26, 2022 10:24 AM
To: Julie Patterson-Hunter
Subject: Re: Let the people vote

Importance: High

Hi Julie,

My message was this:

Please, the mine is too big an issue for a few people to decide. At least send it to a local popular vote.

Ind 370-1

Best,
Joan Keyes & Jonathan Peck

Dovetail Publishing Services
11159 Alpine Lane
Grass Valley, CA 95945
530-272-1990 phone
530-272-8300 fax

On Jan 26, 2022, at 9:45 AM, Julie Patterson-Hunter <Julie.Patterson-Hunter@co.nevada.ca.us> wrote:

Good Morning -
I received your email, but I am unable to open links and/or attachments from unknown sources.
If you could send me the information in a manner that is not linked or attached I will be able to provide it to the Board members.
Thank you,

Julie Patterson Hunter, CCB
Clerk of the Board

-----Original Message-----
From: Dovetail Services <jk-jp@dovetailpublishingservices.com>
Sent: Tuesday, January 25, 2022 10:46 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: Let the people vote

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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INDIVIDUAL LETTER 370: JOAN KEYES AND JONATHAN PECK

Response to Comment Ind 370-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 371

From: Dovetail Services
To: Idaho MMEIR
Subject: Rise Gold Mine
Date: Friday, March 11, 2022 1:39:26 PM

Dear people making this decision,

Ind 371-1 This mine is the worst idea ever. I don't need to outline the possible bad affects this will have on our community. A few jobs for a few years and some tax income is not worth the risk of destroying the paradise where we live. We are already still dealing with the effects of the last gold mining operations including on just from the 1990s. https://www.theunion.com/opinion/columns/jonathan-keehn-the-siskon-mine-well-disaster/.

Ind 371-2 No matter what the impact report says, this company is not to be trusted. You only have to look at their Canadian record to see what folly it would be for us to have a mine here. https://www.minewatchnc.org/shouldnt-trust-rise-gold.

Ind 371-3 Poisoned streams; drained wells; environmental havoc; noisy, heavy, stinky trucks tearing up the roads; traffic; noise! We don't need any of it! Please read the letters to the editor in *The Union*. The vast majority of residents in Grass Valley and Nevada City do NOT want this mine to open. https://www.theunion.com/search-results/?q=rise+gold&range=2021-12-11.

Please, we beg you—vote NO. Do you want to be held responsible for making a horrendous decision that could ruin our community and beautiful lands for decades or longer?

Best,

Ind 371-4
Joan Keyes & Jonathan Peck
Dovetail Publishing Services
11159 Alpine Lane
Grass Valley, CA 95945
jk-jp@dovetailpublishingservices.com

INDIVIDUAL LETTER 371: JOAN KEYES AND JONATHAN PECK

Response to Comment Ind 371-1
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 371-2
Please see Master Response 3.

Response to Comment Ind 371-3
Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 371-4
The comment is a conclusion and does not address the adequacy of the DEIR.

Individual Letter 372

Ind 372-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means ing careers with an average expected a ng benefits. The mine will also spur an a ess in the area. This project will enhar ty workers and their families and help build stable and prosp



Ms. Joan Robertson
PO Box 126
Cedar Ridge, CA 95924-0126

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

INDIVIDUAL LETTER 372: JOAN ROBERTSON

Response to Comment Ind 372-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 373

From: Joanna Pedroncelli <mikolouise924@icloud.com>
Sent: Monday, April 4, 2022 12:49 PM
To: Matt Kelley
Subject: Idaho Mine Opposition Plea

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Dear Mr. Kelley,

I am writing as a citizen of Grass Valley who is extremely concerned about the proposal to re-open the Idaho-Maryland Gold Mine. My husband and I moved to Grass Valley in 2018 to be closer to his family but the main attraction to this area was the magnificent wild beauty and small town friendly charm. We have been so happy here and though my husband has been battling cancer for 18 months, we feel strongly that living here has been a healing boost for its peaceful, scenic beauty and welcoming community.

Ind 373-1

History has proven that a gold mine cannot be operated without a tragic permanent devastation to the surrounding environment. Mining affects everything and everyone in proximity for many generations to come. I plead with you and your fellow Board to protect our town and its citizens. The short term financial gain, if any, will be overshadowed by the loss of our clean water and personal wells, natural wild life community, quiet neighborhood, lack of traffic and pollution and the decline of property values.

Ind 373-2 Will the Canadian Rise Gold Company be financially responsible for the devastation they will cause by the simple fact of operating their business? I would like to see the DEIR

Ind 373-3 Who is going to replace the millions of gallons of water our community will lose to toxic contamination when we already have a drought and water is precious as it is?

Ind 373-4 How long will the soil be contaminated by the tailings? Who cleans that up and how?

Ind 373-5 In an ever decreasing realm of wilderness, what will become of the wildlife that currently inhabit the many acres which will be affected by the mine? How many species of animals will be displaced or lose their life due to mining operations?

Ind 373-6 Who wants to visit a town or live near a gold mine causing loud truck traffic and fumes from diesel engines running all day, not to mention increased traffic? What impact will this have on our town?

Ind 373-7 What is the upside of reopening the mine, except for the Canadian company's financial gain? The economic losses due to lowered real estate values, less tourism, more pollution and a declining quality of life to the citizens of the area will be much greater.

Thank you for your time.

Sincerely,
Joanna Pedroncelli

1

16753 Greenhorn Road
Grass Valley, CA 95945
707-239-1202
mikolouise924@icloud.com

INDIVIDUAL LETTER 373: JOANNA PEDRONCELLI

Response to Comment Ind 373-1
The commenter opposes the project on the basis that the economic benefits are outweighed by the environmental impacts. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 373-2
This comment references the Project Applicant and does not concern the adequacy of the DEIR. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 373-3
The commenter is concerned that the project will contaminate groundwater. However, the water in the Idaho-Maryland Mine does not supply private wells and the project would treat the water pumped from the Idaho-Maryland Mine to state standards (Central Valley Regional Water Quality Control Board) under state permitting, which would improve the water currently in South Fork Wolf Creek. DEIR Chapter 4.8 (Hydrology and Water Quality) found that impacts associated with the dewatering, treatment, and discharge process would be less than significant after mitigation. (DEIR, p. 4.8-41.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 373-4
The commenter asks how long the soil will be contaminated by the tailings and who will remediate the site, but it is unclear what site the commenter is referring to and which waste (e.g., existing waste at the Centennial Industrial Site or engineered fill). The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, Master Response 8 - Mine Waste Characterization, and Master Response 9 – Historical Mine Waste at the Centennial Site.

Response to Comment Ind 373-5
The commenter is concerned about the wildlife that inhabits the area of the project site. The DEIR states that impacts to special-status wildlife species would be less than significant. The commenter is referred to Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 373-6
The commenter is generally concerned about traffic and air quality impacts but does not provide any additional information on which to formulate a specific response. The DEIR found that all traffic-related impacts (with the exception of traffic at the SR 174/Brunswick Road and Brunswick Road/Sutton Way intersections) would be less than significant. (DEIR, p. 4.12-54, 67, and 69.) Regarding air quality impacts, the commenter is referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and

operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

Response to Comment Ind 373-7

The commenter opposes the project because of perceived adverse economic and social impacts. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Individual Letter 374

I support re-opening the Idaho-Maryland Mine Impact of mining in other countries is horrible.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 374-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

our rocks make this certified GOLD.

Name(s) Joanne Drummond

Address 11148 Lower Circle Dr ZIP 95949

Phone 530-913-7757

Email Address jdrummondgv@hotmail.com

INDIVIDUAL LETTER 374: JOANNE DRUMMOND

Response to Comment Ind 374-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 375

From: jevers888@gmail.com
Sent: Friday, April 1, 2022 12:50 PM
To: Idaho MMEIR
Subject: Rise Mine

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Dear Supervisors,

We have been residents of Nevada County since 2007. We have had issues with our well on and off from lack of water due to drought the entire time we have lived in Nevada County. Our well got so bad one year we were having red soil sediment flow into the house and were looking into having to drill a second well. I've heard of this same story, as you have, throughout Nevada County over the years.

Ind 375-1

With the proposed project of Rise Mine I am concerned about the 107,000 gallon a day project use of water. According to the DEIR and Raney Report/Assessment, most of which comes from Rise's own research, the Mine will be using NID water, ground water, and local municipal water. As you know the dewatering process of drilling below the water table will necessitate Rise Mine dumping large amounts of water into the south fork of the Yuba river, 10%of water use, so they estimate, or 10,700 gallons a day, 3,852,000 gallons per year.

Ind 375-2

Again, these reports were not supplied by independent sources. Rise even claims that they will even be making more water than they use! As you also know from the reports that Rise will not be responsible for flooding, damages, culverts or any other infrastructure improvements along the South Fork as it dumps its pumped water out into a location off of Brunswick and highway 49 on its way towards Grass Valley.

Ind 375-3

My concern is that the water will create flooding in Grass Valley especially in the winter months, as the mine plans to run 24/7, and most importantly, all that desperately needed water will simply flow down the hill to the valley by gravity. I worry that we will have less water for our homes, our wells, and our ever worsening wildfires in the summer and fall.

As stewards of our community I find it astonishing that you have all voted in favor of the DEIR for Rise and essentially this mine project.

With regret,
Joanne Evers
Susan Greenawald

Sent from my iPhone

INDIVIDUAL LETTER 375: JOANNE EVERS AND SUSAN GREENAWALD

Response to Comment Ind 375-1

Please see Master Responses 14 through 16 regarding groundwater, and 35 through 36 regarding discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 375-2

See Response to Comment Ind 375-1. All reports submitted by the applicant were independently peer reviewed by a third party hired by the County.

Response to Comment Ind 375-3

Please see Chapter 4.8, Hydrology and Water Quality, of the DEIR, which evaluates potential impacts related to flooding that could occur as a result of the proposed project. Please see Master Responses 14 through 16 regarding groundwater, and 35 through 36 regarding discharge to South Fork Wolf Creek. See Master Response 6 regarding wildfire.

The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. See Master Response 1.

Individual Letter 376

From: Julie Patterson-Hunter
To: "irishousestudios@yahoo.com"
Subject: RE: FARSIGHTED
Date: Monday, March 21, 2022 12:14:00 PM
Attachments: image001.png

Thank you – your email has been received

Julie Patterson Hunter, CCB
Clerk of the Board

Dist 4

From: Joanne Wohlfeld <irishousestudios@yahoo.com>
Sent: Saturday, March 19, 2022 9:58 AM
To: Webmaster <Webmaster@co.nevada.ca.us>
Subject: FARSIGHTED

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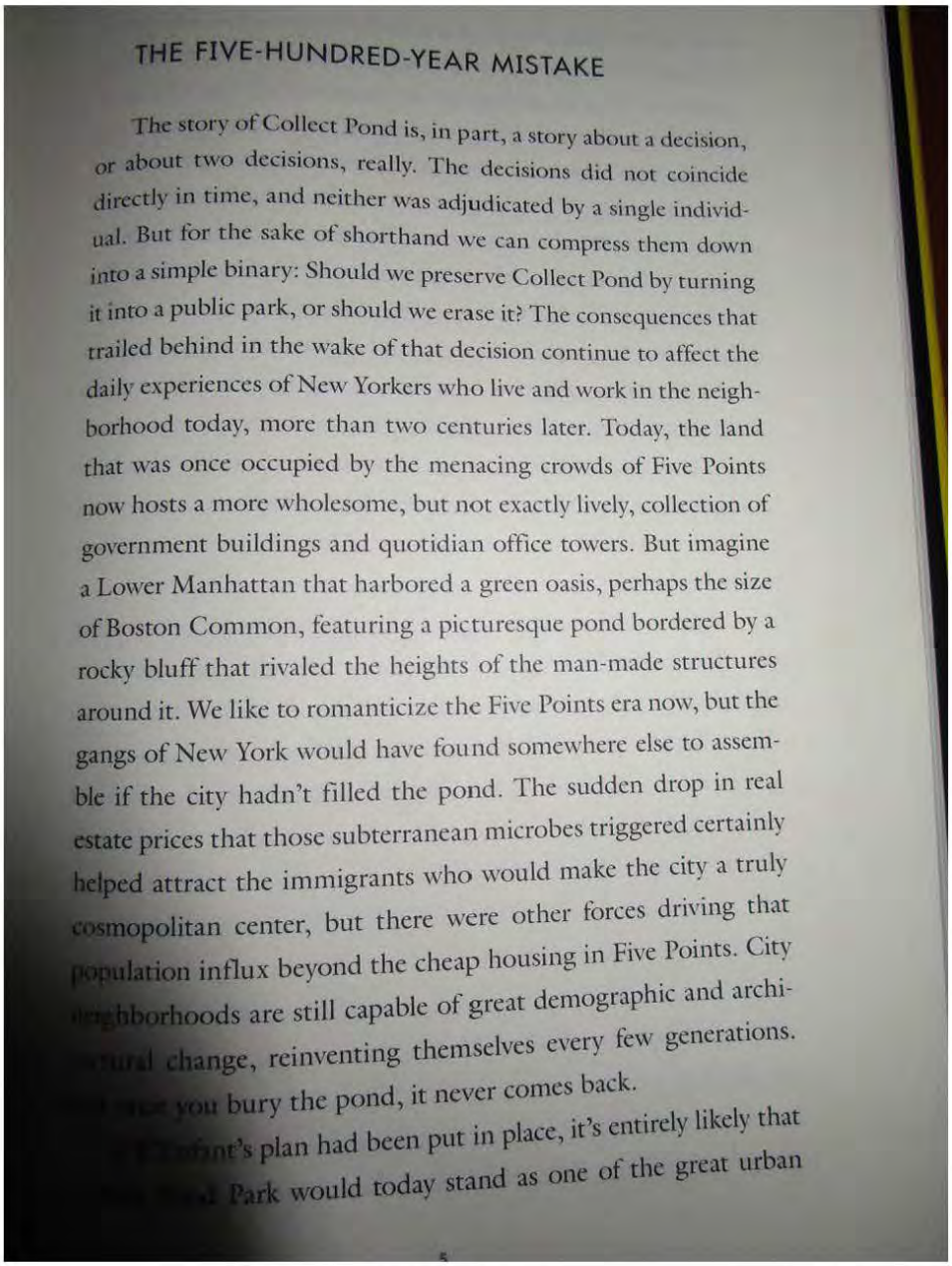
Ind 376-1

To: Board of Supervisors; A very interesting (non fiction) book I read and urge everyone on the board to take a look at it if not already is "Farsighted" how we make the decisions that matter the most by Steven Johnson.
Here is a page at the beginning of the book. Please don't let an opening of a mine (Rise) to happen in this County.

Ind 376-2



THE FIVE-HUNDRED-YEAR MISTAKE

The story of Collect Pond is, in part, a story about a decision, or about two decisions, really. The decisions did not coincide directly in time, and neither was adjudicated by a single individual. But for the sake of shorthand we can compress them down into a simple binary: Should we preserve Collect Pond by turning it into a public park, or should we erase it? The consequences that trailed behind in the wake of that decision continue to affect the daily experiences of New Yorkers who live and work in the neighborhood today, more than two centuries later. Today, the land that was once occupied by the menacing crowds of Five Points now hosts a more wholesome, but not exactly lively, collection of government buildings and quotidian office towers. But imagine a Lower Manhattan that harbored a green oasis, perhaps the size of Boston Common, featuring a picturesque pond bordered by a rocky bluff that rivaled the heights of the man-made structures around it. We like to romanticize the Five Points era now, but the gangs of New York would have found somewhere else to assemble if the city hadn't filled the pond. The sudden drop in real estate prices that those subterranean microbes triggered certainly helped attract the immigrants who would make the city a truly cosmopolitan center, but there were other forces driving that population influx beyond the cheap housing in Five Points. City neighborhoods are still capable of great demographic and architectural change, reinventing themselves every few generations. But once you bury the pond, it never comes back.

If Delafont's plan had been put in place, it's entirely likely that Park would today stand as one of the great urban

INDIVIDUAL LETTER 376: JOANNE WOHFELD

Response to Comment Ind 376-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 376-2

The comment provides a scanned excerpt of a non-fiction book in support of the sentiments expressed in Response to Comment Ind 376-1 and does not address the adequacy of the DEIR.

Individual Letter 377

From: John A
To: BOS Public Comment
Subject: No Mine!!
Date: Sunday, February 27, 2022 2:13:39 PM

Dist 1

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Ind 377-1

On behalf of all my neighbors and my family here on Pinewoods on the border of Nevada City / Grass Valley,
NO No NO
Mine!!

Thank you!

John Alevizakis

INDIVIDUAL LETTER 377: JOHN ALEVIZAKIS

Response to Comment Ind 377-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 378

From: John A
To: bdofsupervisors
Subject: No Mine PLEASE!
Date: Monday, January 31, 2022 12:27:18 PM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 378-1

All our neighborhood, off Good Flat, opposes the opening of the mine...

we're passionate about the health of our community and the sustainability of our town.

Please shut down any further efforts to reopen, Thank you,

John Alevizakis
Sneath Clay Rd, Nevada City

INDIVIDUAL LETTER 378: JOHN ALEVIZAKIS

Response to Comment Ind 378-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 379

From: John A <littlebuddhastudio@yahoo.com>
Sent: Sunday, March 27, 2022 7:07 AM
To: Idaho MMEIR
Subject: No Mine!

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Ind 379-1

For so many reasons, far FAR outweighing any positive ones, my family and neighborhood strongly OPPOPSE re -opening the mine. On behalf of our entire community...

Thank you!

John Alevizakis
Sneath Clay Rd
Nevada City

1

INDIVIDUAL LETTER 379: JOHN ALEVIZAKIS

Response to Comment Ind 379-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 380

From: John D.
To: Clerk of Board
Subject: Proposed Gold Mine opening
Date: Friday, February 4, 2022 10:00:27 AM

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 380-1

Dear Board of Supervisors,

I've only lived in Nevada County 21 years, but have read extensively about both my county and mining operations in the United States. Put my and my family's name firmly in the column of "object to the proposed reopening of the Idaho-Maryland Mine". It's a NIMBY objection based upon research.

Sincerely,
John Deam
14844 Craig Lane, Grass Valley, CA 95945

INDIVIDUAL LETTER 380: JOHN DEAM

Response to Comment Ind 380-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 381

John Fischer
13516 Winterwood Lane
Nevada City , Ca 95959

Nevada County Planning Dept.
Attn: Matt Kelly
950 Maidu Ave, Suite 170
Nevada City , Ca 95959

Regards: Idaho Maryland Mine Project

Ind 381-1

Dear Mr. Kelly

I'm sad that I have to write this letter , I would think the powers that are in place would have all ready denied this project .

Please consider the of lack the water and the stress this will cause this community in lack of resources .

Ind 381-2

We have the joy of living in place where we can get our drinking water from our wells. Why make problems for people who lived here and have established wells . For the sake of few jobs and profit to people in another country !!!!!

I beg you vote NO NO NO on this project of destruction of our community. We don't need the noise and pollution of trucks rolling up and down our already well used highways ..

Ind 381-3

Best Reagrds

John Fischer



INDIVIDUAL LETTER 381: JOHN FISCHER

Response to Comment Ind 381-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 381-2

Please see Master Responses 2, 3, and 13 through 15.

Response to Comment Ind 381-3

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 382

Comments on Draft EIR

CONCERNING IDAHO-MARYLAND MINE PROJECT

SUBMITTED TO NEVADA COUNTY PLANNING DEPARTMENT

JOHN F. HAVERTY
APRIL 3, 2022

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1. Summary

1.1. Identity

My name is John Haverty. I have lived in Nevada County since 2014, in the Forest Knolls region of lower Banner Mountain, and in California since 1990.

Ind 382-1

Although I am now retired, I spent most of my career working as a consultant in the computer field, for several different companies, both as a manager and individual contributor. I have undergraduate and graduate degrees in Electrical Engineering from MIT. I have several decades of personal experience in the business and technical aspects of consulting. Most recently I also consulted as an expert witness in a patent litigation, and prepared several reports as part of that work.

I also have personal experience with the impacts of Mining, from my family experience while growing up, in the area of central Pennsylvania where my ancestors settled. Although that area involved mining anthracite coal, much of the aspects of environmental impact may be similar to those of the "hard rock mining" that will be performed in the Project.

Additionally, I served 6 years in an elected position as a Board Member of a California Special District. Thus I have some understanding of the pressures, and constraints, under which public officials must operate.

I am not being compensated for creating this report, other than satisfaction in acting as a citizen of the area.

1.2. Position

I have not yet formed a position on the Mine Project. It is a complex situation with long-lasting effects on our community, both pro and con. A decision to proceed or not, and selection of the most appropriate Alternative, demands gathering as much information as possible before making a decision with such long-lasting effects. The EIR is one important component of that information.

As requested, my Comments address only the Adequacy aspects of the Draft EIR. I have tried to present no opinions on the accuracy of the EIR or the data it presents.

1.3. Adequacy of Draft EIR

The Draft EIR is quite detailed and lengthy, and contains much information in support of its conclusions. However, in my opinion, the information and analysis presented in this Draft is insufficient to warrant any conclusions or subsequent decisions. The Draft EIR is inadequate for those purposes, for the following reasons:

Ind 382-2

- **Time Scale**: An EIR is expected to detail the impact that a Project will have on the environment, i.e., compare the two scenarios of the future, one where the Project happens, and the other where it does not. This EIR seems to compare the Project scenario with the scenario of the local environment today, or in the very near term. The Project projected lifetime is 80 years. It should be evaluated in comparison to an 80-year projection of the Grass Valley area without the Project, but including all other changes that can be reasonably predicted over that timeframe.

Ind 382-3

- **Alternative Outcomes**: The EIR seems to consider only one scenario for the Project, where everything goes according to plan and the Project operates for many decades. There are many other possible, and perhaps more likely, scenarios which should be evaluated.

Ind 382-4

- **Local Conditions**: Although the EIR is comprehensive with its inclusions of many aspects of an environment, I find that it is quite generic in its structure. I know from experience that this is a common practice in Consulting, to make it easier to generate comprehensive reports by exploiting the commonality across many projects. However, this makes it easy to miss some of the situations specific to a particular Project, which can have significant environmental impacts. I have found several aspects of the Grass Valley environment which have apparently not been considered in the EIR analysis.

Ind 382-5

- **Incomplete Analysis**: The technical aspects of impacts on the environment are necessarily complex and interrelated. Using my personal experience, I have noticed some technical aspects that can affect the environment but which I haven't found to be addressed in the EIR.

The EIR document is sizable and addresses many different areas of possible concern, and I have not been able to exhaustively review and consider all of its information. However, the aspects that I have noted above, and provide a few detailed examples below, bring me to question the Conclusions of the report. Additionally, I have only used my personal experience to focus on issues that I have encountered where I have some background and expertise. There may be other similar inadequacies in other areas of the EIR's analyses that other reviewers may have reported in their comments.

Ind 382-6

In addition, my comments are based on a likely inadequate reading of the Draft EIR, with more than 1000 pages of information. If some inadequacy that I note has actually been addressed in the Draft EIR, and I simply have not yet found it, I apologize for my error.

1.4. Recommendation

In my opinion, the Draft EIR is inadequate in providing an accurate comparison of the Grass Valley environment with and without the Project. I recommend that the Draft EIR be rejected as inadequate, and a revised EIR be prepared which addresses all of the reasons cited above, plus others which other reviewers may have identified. With such a report, an informed decision can be better made to identify which of the various Alternatives is best for everyone.

In the sections which follow, I provide some details for each of the reasons summarized above.

2. Time Scale

2.1. Known Projects

The Draft EIR itself identifies changes to the local Environment, and notes that such changes are not yet even defined since they are still in the planning stage and need to be completed, receive government approval, and be implemented.

Ind 382-7

One example is the "DTSC Cleanup Project" mentioned in the Introduction section of the Draft EIR. A plan has been developed, based on tests done in the area to determine what cleanup procedures will be needed. The plan however has not yet been approved, and may change before it can even be initiated.

As with any construction project involving excavation, only when the actual digging is performed will the actual conditions under the surface be known. If unanticipated conditions are discovered as the cleanup proceeds, the plan may have to be modified to accommodate the actual site situation rather than the situation expected when the plan was developed.

The Draft EIR makes some assumptions that seem risky. One example is its assumption that the Cleanup plan as known today will be approved. It assumes also that the plan as known today will be executed with no significant changes needed when site conditions are exposed with digging.

Basically, the Draft EIR recognizes that the environment is going to change as tasks such as the Cleanup Project are actually performed, and it assumes that the new conditions after the Cleanup will be as expected from the current plan which is not yet either approved or begun. The Draft EIR assumes that the Cleanup will simply go as planned, and bases its analysis and conclusions on that questionable assumption.

2.2. Planned Projects

The Draft EIR in some places recognizes that the environment of Grass Valley is changing, with numerous Projects in various stages of implementation. Driving around the area, one can observe several construction sites in progress. Other Projects are at various stages of the planning process, such as the Dorsey Marketplace. Others are still conceptual.

Ind 382-8

Such changes are happening as the area grows. We can't know which of the Projects will actually complete, especially those in planning or concept. But it seems reasonable to expect that some of these Projects will occur. Over the 80-year lifetime anticipated by the Draft EIR, it seems likely that many such Projects will be approved and implemented, bringing more people, jobs, and commercial activity to the area.

Other ongoing activities within the Grass Valley area can be expected to change the environment, even before the Project is initiated. For example, there has been much activity over the past few years to mitigate wildfire danger by removing trees and brush accumulated over many years. Federal, state, and local agencies are clearing public lands. Residents are clearing their properties. Significant time and expense is altering the landscape of the area around the Project site.

State and local laws and regulations have been enacted recently to mandate such activities. For example, there are regulations now for roadways that require a 10 foot clearance on the side of roadways, free of all flammable material.

Efforts to comply with such regulations can be seen all over the County. But there is still much work to be done, and it is easy to find locations that do not yet conform to the standards. But as the hundreds of loads of brush being collected recently indicate, people are working on it. As they do, they are changing the environment.

2.3. Effects

Ind 382-9

Such changes have many effects on the area of Grass Valley, and will create a new Environment in which the Mine Project should be evaluated. I will highlight a few of the changes that should be considered in the EIR.

2.3.1. Changes in Demographics

The Draft EIR, in mentioning some of the various ongoing projects in the community, notes that they will cause "significant changes", regardless of whether or not the Mine Project happens.

Yet the same report, in other sections, fails to recognize that those significant changes will happen. For example, the Transportation analysis of section 4.12 has extensive detail of "Existing Conditions", and then uses those Conditions to evaluate how the Mine Project will impact traffic flows.

Ind 382-10

By its own admission in other sections, today's Existing Conditions will undergo "significant changes" as Grass Valley evolves, even without the Mine Project happening. As more housing is built, the population will shift. As more services and destinations, such as a shopping area, appear, traffic patterns will change.

The Draft EIR performs an analysis by comparing an Environment which will not exist, i.e., today's Environment, with the same Environment but including the Mine Project, as indicators of the Environmental Impact over the next eighty years. Neither of those Environments is likely to match the reality of what will exist, even in the near future, as unrelated ongoing projects change the Grass Valley Environment. It similarly does not address the Environment which will exist as Grass Valley naturally evolves but includes the Mine Project.

Such an analysis of situations that will not actually occur seems of dubious value in making decisions.

2.3.2. Changes in Physical Conditions

Community projects such as I've described have a common characteristic which is relevant to the EIR analysis. Such projects change the physical landscape. They often involve modifications to the land itself, such as grading and road construction.

Ind 382-11

In addition, such projects often involve removal of significant amounts of trees and brush. In doing so, they introduce new "view" scenarios, where people are now active in areas that were previously vacant. They also change the views of areas surrounding each such project, as people there can now see through areas which were previously covered by trees and brush.

Also, removal of trees and brush has a significant impact on the behavior of sound. Foliage acts as a barrier to sound, limiting its travels through the community. With the foliage removed, sounds can propagate farther and be louder than before.

From personal experience, I have seen such effects. Our local community has been quite active over the last few years in clearing trees and brush to address fire safety. As a result, our

neighbors can now see and hear each other, as well as hear the road and freeway noise, much better than just a few years ago. Such is the price of fire safety.

The Draft EIR similarly analyzes Sound and Vibration using Site Conditions today, rather than those that will exist in the Grass Valley area as it evolves, even over the next few years before the Mine Project could actually begin operation.

The analysis, e.g., of "Sound and Vibration" concludes that effects of the Mine Project will not be of significance. But such a conclusion is based on the Site Conditions today, not those that will exist even in the near future.

Such conclusions are also of dubious value for making decisions.

2.4. Inadequacy of Draft EIR

The Draft EIR compares two scenarios: the Grass Valley area as it exists today, and the same situation as it would exist with the Mine Project. Neither situation is what may actually exist even in the next few years, and the Draft EIR shows no justification for the accuracy of the "today" scenario as representative of future conditions.

Because it analyzes situations which are not the actual ones that may exist, all of the evaluations and conclusions regarding the Significance of environmental impacts of the Mine Project on Grass Valley are of questionable value, and should not be used for guiding decisions.

3. Alternative Outcomes

3.1. Corporate and Government Responsibilities

As a corporation, any Project management has a primary responsibility to its Owners and Investors, to deliver the promised financial returns as well as to follow federal, state, and local laws and regulations while doing so.

Corporations in general use many techniques to meet their Fiduciary Duty and protect their Owners and Investors regardless of how a Project progresses. Legal mechanisms are used to limit liability. Insurance is obtained to avoid unexpected expenses. Contracts, including Permits, are carefully negotiated to provide best conditions for the Owners and Investors, no matter what happens as the Project proceeds.

During the Project lifetime, the management has a fiduciary responsibility to its Owners and Investors, to make decisions and take actions that bring maximal benefit to them, reacting to any and all situations that may occur, whether predicted or unexpected.

Ind 382-12

Governments accept their own responsibilities as part of granting Permits. They must of course provide for all of the oversight, monitoring, and other such activities to assure that the Project is being performed as required by laws and agreements captured in the Permit. But in particular, they must also absorb the effects of any impacts of a Project beyond those absorbed by the Corporation. That includes not only impacts during a Project's lifetime, but also those that appear, or endure, after the Project ends and the Corporation is no longer involved. Government responsibilities are typically not covered by any kind of insurance, other than perhaps whatever is covered by bonds required of the Project itself. All other effects, financial and otherwise, are absorbed by the government, i.e., by the general population.

Governments have a similar responsibility to take necessary actions, and to find funds to perform those actions, but their responsibility is not limited to the Project lifetime. It is a continuous and perpetual responsibility as agents for the general population.

3.2. Alternative Timelines

The Draft EIR summarizes the plan for the lifetime of the Project and beyond:

> *"The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80 year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. Following completion of mining and processing activities, the project sites would be reclaimed to open space and land suitable for future development of industrial uses."*

Ind 382-13

This represents a "best case" scenario for the Project, where everything works as expected. This is the case that the Draft EIR analyzes.

However, especially over an 80 year timeframe, is it realistic to expect that everything will go as planned?

- Accidents can be expected to happen, possibly with consequences of liabilty and expenses that make the project no longer financially viable;
- Rules, regulations and laws may change, at local, state, or federal levels, which similarly affect the Project's viability;

- Previously unknown consequences of the Project activities may be discovered, that have not been addressed in mitigation measures;
- Standards for mitigation measures may become more burdensome in reaction to new information about how the environment is affected by the Project operation,
- Project management may make poor business decisions that render the Project financially unsustainable
- Previously unknown conditions in and around the Project site may be discovered, rendering the planned mitigation measures ineffective

Over an 80 year timeline, such surprises become more and more likely. Eighty years is a long time. Some of the surprises noted above might only be recognized after the 80 years is past and the Project has terminated. Some may never happen. But the longer the timeline, the more likely that some surprise will occur, and the likelihood of the "best case" scenario of the Draft EIR diminishes.

In response to any of those or other "surprises", Project management must still meet its primary responsibility to the Owners and Investors. The ultimate "mitigation" measure is to prematurely terminate the project and use the legal mechanisms of Bankruptcy to remove all future liabilities for the Owners and Investors.

Such mechanisms are of course unavailable to the government and the public, who must absorb the lingering effects of the Project's activities after it disappears.

In the scenario examined by the Draft EIR, such an event never happens over the 80-year timeline of the analysis. But eventually the Project will shut down. There are many scenarios in which that will occur well before 80 years have passed, as the Project managers react to events and make decisions to protect business interests.

A Shutdown could happen at any time. The Draft EIR doesn't appear to have analyzed any such scenario other than the full 80-year timeline.

3.3. Personal Experience

Since I am now approaching my 80s, I have had time to experience some long-term Projects and their outcomes. One such project reminds me of what can happen in Mining operations.

Ind 382-14

In the 1950s, I recall as a child visiting relatives in the mining areas of central Pennsylvania. We frequently drove through a town called Centralia, PA. It was the quintessential small town in America – a main street with busy storefronts, children playing on the ball field at the edge of town, people tending their gardens in the houses on the side streets, and other such staples of small town life.

The vitality of the town came from the local mining operation. Mine tunnels perforated the ground under and around the town. Mining was a hard life but it supported the town. My grandfather told me many stories of his experiences as a supervisor in one of the mines. Overall, life was good.

In Spring 1962, the unexpected happened. There was an accidental fire, possibly started as part of a cleanup operation triggered by new government regulations. The fire progressed underground, likely through one of the many air shafts and tunnels in the area. The coal seam underground caught fire, fed by the coal as fuel and the air which could be drawn to the fire through the many fissures and cracks common underground. At least that's what some think happened; the true cause of the fire may never be known.

The mining company went out of business, unable to operate a burning mine. The local, state, and federal governments all attempted to put the fire out, at considerable public expense.

Sixty years later, the fire is still burning. The coal deposits run for hundreds of miles. Estimates are that it might burn for 250 years. Surely that wasn't in their Plan.

The town of Centralia, sitting on top of the fire, is now abandoned, unsafe for humans. It is a surreal experience for me to drive through the town now, remembering what it used to be, and seeing instead a scene appropriate for Dante's Inferno, with jets of steam coming out of the ground where the kids used to play.

Gold doesn't burn, so it's unlikely that a similar experience would occur in Grass Valley. But my experience has been that accidents do happen, and things don't always go according to plan.

I've only lived in Grass Valley for 8 years, but I can see evidence of unplanned events in past local mining activities. For example, we have a state park where Empire Mine used to operate. I've learned that it was shut down prematurely due to war constraints and has been idle for almost 70 years.

Yet there are still today areas of the Park where the soil is too toxic to permit visitors to even walk through the area safely. The mining companies are long gone, and the government now has the continuing responsibility to monitor the area while trying to find funds to perform mediation activties. Like the mine fire I experienced, such responsibility and expense is likely to go on for many years.

3.4. Inadequacy of Draft EIR

The Draft EIR focuses on the "best case" scenario of a mining operation proceeding as planned for 80 years. It details numerous tasks that will be performed by both the Project staff and government overseers during the 80-year lifetime.

The Draft EIR does not appear to consider the possibility that the Project will not go as planned, and may terminate prematurely. It does not describe the environmental impact which will occur if the ongoing tasks of monitoring and mitigation are no longer being performed after the Project ceases – either after 80 years of possibly much sooner.

Ind 382-15

In my opinion, the 80-year lifetime scenario is unrealistically optimistic, and it is far more likely that something will occur much sooner that will affect the Project. Since the Draft EIR does not consider such a possibility, which seems more likely to be the actual experience that will occur, its analysis and conclusions do not reflect the reality of what Grass Valley is most likely to experience in the future, both near-term and long-term.

Reliance on any such Plan, especially one with such a long timeline, is extremely risky for the government and the people, who are not protected by the various legal structures to limit liability as the Corporate entities are.

For example, the plan describes activities such as dewatering, treatment of water before release into the environment, monitoring of wells and runoff from mine tailings, and other such measures to be taken continuously during the lifetime of the Project.

The Draft EIR fails to specify how such activities will occur if the Project terminates prematurely.

The Draft EIR is inadequate for purposes of evaluating the likely environmental impact of the Project, and should not be used as guidance for decisions until it is revised to address the most likely realities of the future, especially the time period after the Project is terminated, whether that happens in 80 years or just a few months.

4. Local Conditions

The Draft EIR has not considered Local Conditions that are specific to Grass Valley, and may be important to Environment Impact.

4.1.1. Sound, in the Grass Valley "Auditorium"

I am not an Acoustics Scientist or expert in that field. However, I worked for 13 years at a consulting company that was renowned for its Acoustics expertise, and had done numerous projects in that area. For example, the company was responsible for the analysis of the gaps in the Watergate Tapes, for the reconstruction of the Kennedy Assassination shooting recordings, for the design of many venues such as the auditorium of the United Nations, and numerous government contracts related to sonar, submarine detection and such acoustic technologies. By being surrounded by experts for years, I absorbed some knowledge about acoustics.

The Draft EIR references that it used a "SoundPlan model" but includes no details of what the model involves, how well regarded it is in the Acoustics field, or how well it applies to the Grass Valley area. Without some reassurance by independent experts about the validity of the Sound analyses discussed in the Draft EIR, I would be reluctant to accept its conclusions.

Ind 382-16

Specifically, one of the things I learned from my exposure to Acoustics experts was the complexity involved in analyzing sound behavior in venues such as auditoriums and arenas. Sound bounces off walls, and the angles formed in corners have a significant effect. Soft materials, such as curtains and seat upholstery, are used in designs to minimize the effects of such reflections, or even to augment them to make sound from a stage reach into all areas of the venue.

Grass Valley is, as its name implies, a Valley – i.e., a low area of land surrounded by hills and mountains. In effect, the entire Valley is a large "auditorium" where sound behaves as it always does, bouncing off the "walls" of mountains and buildings, and shaped by the "soft materials" in the venue – i.e., the trees, grass, and brush.

The Draft EIR, on page 4.10-23, explains the scientific fundamentals of Sound: "As a general rule, sound from a localized source spreads out as it travels away from the source, and the sound pressure levels drop off with distance according to fundamental relationships."

My non-expert understanding of the science concurs with that statement – but only in the case where the "localized source" is in the middle of a flat plain. As you have undoubtedly noticed, Grass Valley is not a flat plain. We're not in Kansas.

The sound analyses described in section 4.10 seem to base their analysis on measurements and projects in the immediate area of the Mine Project itself, e.g., "at Nearest Residences" and "at Nearest Receptors". Even if such measurements and predictions are correct, they fail to recognize the nature of Grass Valley as an "auditorium".

In auditoriums, sound can be focussed by the various walls and anything that reflects the sound, as well as by things that absorb it. This can have an amplifying effect. In some auditorium designs, words spoken on a stage will be louder in the audience than they are to other people on the stage, because the design of the walls and baffles purposely focusses the sound into the audience.

If the Mine Project is the "stage" from which sound is emitted, it may be quite a bit louder at some distance greater than the "nearest" listeners. The hills and mountains surrounding the Project

Site are the "walls" of our "auditorium", and will affect the propagation of sound in the Valley just as they do in a building.

Additionally, as I noted above, ongoing efforts in the community, many required now by law, will remove noticeable quantities of brush and trees. That will likely change the acoustic character of the Grass Valley "auditorium", making sound more easily propagated as such sound absorbing materials are removed. The sound analyses of the EIR should consider the future conditions of the area in order to get an accurate projection of how sounds will affect the Environment.

Because of these effects, I would expect a much more detailed and expansive acoustic analysis would be required before drawing conclusions such as are in Section 4.10 of the EIR.

4.1.2. Non-vehicular Transportation

Significant analysis is presented in the Draft EIR relating to Transportation, even including Bicycle and Pedestrian usage. However, the analysis seems to be limited to transportation along existing roadways. Similarly, analysis of the Environmental Impact of the Project on Views seems to focus on views experienced by the public as they travel through the area roadways.

While such analyses may be common, and appropriate, for Projects in Urban areas, the Grass Valley Area is not typical of such areas. People move to, live in, and visit Grass Valley in many cases for the wealth of outdoor activities which are available in the area.

Ind 382-17

Specifically, there are numerous hiking, equestrian, and mountain biking trails in the area, including in various Parks, NID and BLM lands, and other public areas.

The Draft EIR extensively analyzes uses of the roadways, and assesses the impact of the Project on the public using those facilities. But it seems to ignore the use of the many trails in the area for non-vehicular travel, and assess the impact of the Mine Project on the public use of those facilities, including both impacts on Views as well as effects of Sound.

Additionally, such public usage will also be affected by ongoing efforts such as brush and tree removal for fire safety. As noted earlier, such activities can be expected to change the nature of the Grass Valley, especially as Views and Sound are concerned.

Without an analyses of the Mine Project impact on the non-vehicular aspects of public use, focussed on the future rather than just the present, the EIR seems incomplete, and its conclusions about the impact of the Project are invalid.

4.1.3. Tourism

As noted earlier, part of the public usage in Grass Valley comes from Tourism. The Draft EIR does not seem to distinguish any different components of "the public" in drawing its conclusions about the significance of the Mine Project impact.

Ind 382-18

However, it seems reasonable to conclude that different people have different sensitivities to aspects such as Views and Sound. Residents might be here because of job opportunities or housing options. Tourists likely come for the experience of the Mountains and the natural environment.

In particular, Tourists may be less tolerant of situations where noise and views become more industrial, replacing the natural experience that attracted them with industrial noises, smells, and congestion.

The Draft EIR fails to distinguish any components of the public presence in Grass Valley, or differentiate the likely significance of the Project to each. For example, will Tourism fade away if Grass Valley becomes a less desirable place to visit?

Although I understand that the Draft EIR is not intended to analyze economic impacts, this aspect of the EIR failure to differentiate parts of the public should be corrected, so that suitable projections on Tourism behavior is available to the Economic Study.

4.1.4. Inadequacy of Draft EIR

By failing to consider local conditions specific to Grass Valley, the Draft EIR paints an incomplete picture of the effects the Mine Project is likely to have on our specific area. Its conclusions are therefore likely inaccurate, and should not be used to guide decisions.

5. Incomplete Analysis

The Draft EIR fails to analyze issues completely, ignoring some aspects which could alter its conclusions.

5.1.1. Psychoacoustics

In my ~~exposure to~~ Acoustics experts, I learned of the existence of a scientific field called Psychoacoustics. This is the study of how sound affects people, which is of course one of the major "Environmental Impacts" that will occur.

The Draft EIR presents much data about expected sound and noise levels, and compares the expected sound levels against various limits determined to be maximum acceptable levels. It draws conclusions such as sound levels being far below "levels at which structural damage to buildings is possible."

Ind 382-19

However, maximum sound levels are not the only criteria for evaluating the effects of sound.

Anyone who has experienced sleeplessness in the middle of the night due to a faucet dripping will understand that even seemingly innocuous sounds can have a devastating psychological impact on people. Such techniques have even be adopted as interrogation tactics, such as the "chinese water torture". No physical damage is visible, yet the mental damage can be severe.

Sounds do not have to be loud and damaging to have a serious impact on the Environment in which people live, work, and play. An unrelentless minor sound, such as a dripping faucet, can have serious impacts on people.

Sounds associated with the Project, even if seemingly benign, might have a serious effect when they are repeated, incessantly, every day, for years, and echo throughout our Valley. Rumbles of random explosions, muted roar of trucks and machinery, and other such sounds and vibrations may not be strong enough to cause damages to property, and may meet government standards intended to avoid such damage.

But they may cause serious psychological damage, and people affected might not even be aware of what's happening. Grass Valley may become a less desirable place to call home, or a less desirable place to visit as a Tourist, and no one may even be aware of the cause.

An acoustic analysis of the Mine Project, by an expert in Psychoacoustics, seems prudent before accepting the conclusions of the EIR related to the Environmental Impact of sound and vibration, and making decisions about the future.

5.1.2. Effects of Dewatering

Ind 382-20

The Draft EIR presents detailed plans for the dewatering process necessary to the reactivation and operation of the Mine and notes that such pumping operations will continue for many decades. It also recognizes the concerns on the impact of such dewatering on wells in the immediate vicinity, and details mitigation measures that will be taken, at the expense of the Project itself.

The studies referenced in the Draft EIR focus on the site of the Project itself, and the dewatering of the mine shafts to be used for the Mining operation over the next 80 years.

However, even from my personal experience with mining as mentioned above, I would expect that a dewatering operation would not be limited to the Idaho-Maryland site and its own mineral rights areas.

As I noticed in the Centralia Fire above, mines are interconnected, if not by purposeful shafts then likely by fissures and cracks in the hard rock throughout our area. The Centralia Fire, even after its mine shafts and tunnels became involved, was expected to go out as the fuel was consumed. But that didn't happen. The fire spread to other mines, abandoned tunnels, and expanded.

I suspect water will do the same, although it may take years. As mining occurs and blasting is used to make new tunnels and drifts, the associated seismic shocks may open new cracks and fissures, enough to permit water to flow.

Such water flow seems, to me as a non-expert, somewhat unpredictable. Will water flow from an area outside of the Project site, bringing in whatever materials might now be imprisoned there? Will water from the Project site flow out through some new path, possibly escaping all of the provisions put in place to treat it before release into the Environment?

As water flows, it can cause other problems, such as erosion. Running water can reduce mountains to become canyons. Even in Grass Valley, we have recently seen the effects of erosion due to underground water flow. The large sinkhole near the McCourtney interchange developed, as I understand it, because of unexpected water flows underground. That was apparently not a result of any mining activity or artifact, but is indicative of what can happen, and has happened, in our area when water goes where it isn't expected to go.

Huge volumes of earth have been submerged by accumulated water for many decades. Water tends to protect some materials, such as wood that may have been used as timbers for supporting tunnels and other construction in the old mines. Such conditions likely exist in not only the Idaho-Maryland mine, but also others in the adjacent areas.

Ind 382-21

As the water is removed, such old construction will likely be exposed to air, which might cause further decay to begin again. It may take years for the effects to progress far enough for timbers to fail, potentially causing collapses in the underground areas, which may go unnoticed especially if they occur in areas not being actively worked by the Mine Project itself. The Draft EIR does not seem to consider this possibility, even within the Idaho-Maryland site itself where the report is focussed.

(n addition, as water flows and potentially dewaters other areas beyond the specific Project site and immediate neighborhood, wells might fail elsewhere as well, or become contaminated and unusable as water flows change. The Draft EIR seems to lack any explanation of how such occurrences, although not planned or included in the current regulations and agreements, will be mitigated. Will they become the responsibility of the Mine Project, assuming it still exists at that time? Will it be the responsibility of some part of the Government? Will it be the responsibility of the residents who happen to own the affected wells?

5.1.3. Inadequacy of Draft EIR

Ind 382-22

By failing to examine important aspects of the Mine Project, even to note that they will exist but have no significant impact, the EIR analyses are incomplete. Its conclusions, and the various mitigation, monitoring, or other such parts of the 80-year plan to manage such impacts, are also suspect, having been developed with incomplete information.

Above I have presented only a few areas in which I've noticed that the EIR is incomplete, namely in its treatment of Sound, where I have some acquired experience. There are many other elements of the Draft EIR which may have similar failings, but I am not skilled enough to notice

them. For example, the analyses related to Toxic Materials is especially worrisome to me because of its long reaching impact and serious effects, but I have no expertise in that area.

However, the incompleteness I have noticed in the issue of Sound makes me wary of the analyses and conclusions in other areas as well

INDIVIDUAL LETTER 382: JOHN HAVERTY

Response to Comment Ind 382-1
This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 382-2
The commenter states that the environmental baseline for the project incorrectly relies on existing conditions. However, as stated in CEQA Guidelines Section 15125(a)(1), the environmental analysis presented in the DEIR should typically compare the project to the physical environmental conditions as they exist at the time of the Notice of Preparation. Moreover, the DEIR analyzes fluctuations in conditions that may occur over time such as large storm events, multiple dry year scenarios, and effects from reasonably foreseeable future development. As such, the DEIR sets the proper environmental baseline as required under the CEQA Guidelines, but also considers fluctuations in the environment that may occur over the life of the project, when appropriate.

Response to Comment Ind 382-3
Chapter 6 of the DEIR considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines Section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternative analysis in section 6.2 of the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (see DEIR section 6.3.)

Response to Comment Ind 382-4
The comment states that the DEIR is generic in its analysis and presentation of the existing environment. However, the commenter does not identify any specific inadequacies in the DEIR's analysis. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project.

Response to Comment Ind 382-5
The comment generally states that some technical aspects were not addressed in the DEIR. However, the commenter does not identify any specific inadequacies in the DEIR's analysis. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project.

Response to Comment Ind 382-6
The commenter asserts that the DEIR is inadequate in comparing the Grass Valley environment with the project, but does not provide any specific references or examples. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project. Please see Master Response 1 - Non-EIR/ Administrative Issues regarding approval/denial of the project.

Response to Comment Ind 382-7
Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The DEIR analyzes most impacts on the Centennial Site based on the reasonable environmental conditions that are expected when the site is cleaned up under a separate DTSC clean up project. If that separate project does not proceed, the Idaho-Maryland Mine Project would proceed, but would not place any material on the Centennial Site and would not impact the Centennial Site in any

way. Therefore, it would be misleading to analyze most project impacts based on the existing conditions on the Centennial Site, as the project could not impact the Centennial site under existing conditions.

Response to Comment Ind 382-8

The commenter asserts that the DEIR should analyze the project's impact on the environment as the environment changes over time. Please see Response to Comment Ind 382-2 above.

CEQA Guidelines Section 15130 requires an EIR discuss cumulative impacts of a proposed project. Cumulative impacts are considered impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis includes an analysis of cumulative impacts specific to that resource. The DEIR analyzes the project in the context of reasonably foreseeable projects, but the DEIR does not include analysis of future changes in the region that are unknown and/or speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 382-9

The commenter asserts that the project should be evaluated in the context of the changing environment in Grass Valley. Please see Responses to Comments Ind 382-2 and Ind 382-8. Impacts to the City of Grass Valley were analyzed when appropriate based on the resource section. For example, traffic analysis included the analysis of intersections and road segments within the City. In addition, the aesthetics analysis included viewpoint locations within the City boundary.

Response to Comment Ind 382-10

The commenter asserts that the project should be evaluated in the context of the changing environment and points to project impacts in the context of future traffic conditions. Please see Responses to Comments Ind 382-2 and Ind 382-8. The commenter is incorrect in its assertion that only existing conditions were analyzed for the purpose of assessing traffic impacts, as the DEIR analyzed future scenarios based on reasonably foreseeable traffic conditions.

DEIR Chapter 4.12, and the supporting traffic study (see Appendix O), analyzed twenty-four intersections and six roadway segments. As described and analyzed in DEIR section 4.12.4, based on consultation with Nevada County and the City of Grass Valley, seven different scenarios were analyzed including:

- Existing Condition: LOS based on current traffic counts, existing roadway geometry, and existing traffic control.
- Existing Plus Approved Projects (EPAP) Condition: LOS based on the Existing Condition plus traffic and improvements from projects that are approved or are reasonably foreseeable in the next five years.
- EPAP Plus Project Condition – Scenario #1: LOS based on the EPAP Condition plus traffic from the proposed project, considering transport of engineered fill to the Centennial Industrial Site.
- EPAP Plus Project Condition – Scenario #2: LOS based on the EPAP Condition plus traffic from the proposed project, considering transport of engineered fill to construction sites accessible via SR 49.

- Cumulative No Project Condition: LOS based on traffic volumes associated with cumulative buildout of the Nevada County region projected to occur by 2035 without traffic generated by the proposed project. The Cumulative No Project Condition includes reasonably certain projected changes to intersection geometry and roadway segments.
- Cumulative Plus Project Condition – Scenario #1: LOS based on the Cumulative No Project Condition plus traffic from the proposed project, considering transport of engineered fill to the Centennial Industrial Site.
- Cumulative Plus Project Condition – Scenario #2: LOS based on the Cumulative No Project Condition plus traffic from the proposed project, considering transport of engineered fill to construction sites accessible via SR 49.

This was a comprehensive analysis of potential project impacts to intersections and roadway segments consistent with the requirements of CEQA, and based on reasonably foreseeable traffic conditions in 2035.

Response to Comment Ind 382-11

The commenter asserts that the project should be evaluated in the context of the changing environment with respect to aesthetics and noise impacts. Please see Responses to Comments Ind 382-2 and Ind 382-8.

DEIR Chapter 4.1 and Chapter 4.10 analyze proposed project impacts to aesthetics and noise and vibration, respectively. Each section includes an analysis of potential cumulative impacts. The aesthetics section (Chapter 4.1 of the DEIR) determined this impact was cumulatively considerable and significant and unavoidable given the anticipated cumulative build-out in the area changing the visual character of the region. The noise and vibration analysis determined the cumulative impacts were less than cumulatively considerable. (see Impact 4.10-6 of the DEIR.) Notwithstanding, the project-specific operational noise impact was conservatively determined to be less than significant after mitigation. Mitigation Measure 4.10-3 requires a comprehensive noise monitoring program to be conducted of each facet of the operation to verify the modelling assumptions of the project and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. If results indicate that noise standards are being exceeded, operations shall cease until additional engineering controls can be implemented as needed.

The commenter's environmental scenario that "may" exist in the future is not known with any reasonable certainty such that it could be analyzed without engaging in speculation. It is not clear what factors the commenter wishes to have considered, beyond changes in traffic patterns, which is already accounted for in the DEIR (cf. Response to Comment Ind 382-10), and modification of vegetation due to future fuel treatment efforts, which are not clearly defined. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation about future unknown environmental changes in the region, no further response is necessary.

Response to Comment Ind 382-12

Comment noted. This comment is general in nature and does not provide a comment on a specific environmental issue associated with the project. Please see Master Response 1, Non-EIR/Administrative Issues.

Response to Comment Ind 382-13

The commenter asserts that the DEIR did not properly analyze unknown future conditions such as accidents, surprises and changed conditions. CEQA does not require that an EIR analyze impacts based on speculation. (CEQA Guidelines Section 15384.) However, the DEIR incorporates numerous mitigation measures and conditions of approval that provide the County with authority to enforce the requirements of those mitigation measures and conditions of approval to ensure that the project does not cause impacts beyond those analyzed in the DEIR. Moreover, some of the mitigation measures require that the applicant obtain other governmental approvals that will also allow state agencies to have oversight and enforcement authority over project operations to ensure that the project's operations are consistent with applicable law, and the impacts are consistent with the DEIR's analysis. The DEIR analyzes the environmental impacts of the project as proposed and does not attempt, nor is required to analyze under CEQA, the financial viability of a project or the likelihood it will encounter obstacles that may affect its viability. The commenter does not identify a specific impact created by the project or any inadequacy with the analysis presented in the DEIR.

Response to Comment Ind 382-14

The commenter explains the facts surrounding a coal mine disaster in Pennsylvania and draws a comparison to the project. The project does not propose to mine coal, so the projects are distinguishable. Please see Response to Comment Ind 382-13.

Response to Comment Ind 382-15

The commenter states that the DEIR is inadequate because it does not analyze what would happen if the mine closed prematurely. Please see Response to Comment Ind 382-13 above. In addition to governmental oversight provided by the mitigation measures, conditions of approval, and generally by local, state and federal law, the project is required to obtain approval of a reclamation plan and financial assurances. As such, financial assurance will be provided by the mine operator to the County prior to operating the mine, as required under the California Surface Mining and Reclamation Act. (see DEIR p. 3-47.) Financial assurances may also be required by other governmental agencies with oversight over the project such as the Regional Water Quality Control Board in connection with issuance of waste discharge requirements.

Response to Comment Ind 382-16

Commenter alleges that the DEIR did not consider local conditions and is not aware of the SoundPlan Model or its accuracy, and that Grass Valley is an auditorium. The SoundPlan Model, which has been used worldwide for 30 years, is internationally recognized by the acoustical consulting profession as being a state-of-the-art noise prediction model. The latest guidelines and noise standards are constantly being incorporated into the software updates, and SoundPlan staff participate on advisory boards to acoustics standards committees. The sound prediction algorithms have been verified with field measurements numerous times.

The commenter is correct that sound reflections and propagation in auditoriums and arenas can differ from general outdoor sound propagation and that soft materials do absorb, rather than reflect, acoustic signals. However, the commenter is incorrect that the area surrounding the project site behaves like an auditorium, with sound focused in some areas. For sound focusing to occur, sound reflections are required. The area surrounding the project site consists of vegetated



ground cover with extensive pine tree cover. Such materials are acoustically absorptive rather than reflective. Furthermore, the noise contours contained in the DEIR clearly illustrate the extent by which the sound will "travel" from the project site. The SoundPlan model, which was used to generate the project noise contours, accounted for the fact that the project site will consist of harder surfaces with no tree cover, whereas the area immediately surrounding the project site will remain densely vegetated. (DEIR p. 4.10-24.) As a result, the predicted noise levels at both nearby and distant residences reflect the changes in ground cover which will result from the project, as well as the topography of the area surrounding the project area. The detailed and expansive acoustical analysis expected by the commenter for this project was, in fact, completed with the results of that analysis clearly presented in the project DEIR.

Response to Comment Ind 382-17

The comment infers that use of parks, public lands, hiking, equestrian and mountain biking trails in the area may be impacted by noise, and users will see impacts on the views from these publicly available facilities. The commenter does not identify any trails, public facilities or lands or parks located in the vicinity of the project site, or any that may be impacted by the project. The nearest trail to the project area is the Loma Rica Trail, running north-south along Brunswick Road, from Loma Rica Drive north to Bubbling Wells Road; additionally, the edge of Empire Mine SHP is approximately 850 feet from the boundary of the Brunswick Site. (DEIR p. 4.11-8.) However, the distance from that nearest trail to the proposed project's noise-generating operations within the Brunswick Site is over 2,500 feet. The nearest trail within the Empire Mine SHP is nearly half a mile, or approximately 2,250 feet, from the nearest proposed noise-generating activities within the Centennial Site. The DEIR analyzed other sensitive receptors located much closer to the noise-generating aspects of the proposed project, which were determined to be less than significantly impacted by project noise generation, and more distant receptors, including the Empire Mine SHP trail network, or the Loma Rica Trail would similarly be less than significantly impacted by project noise generation. The Loma Rica Trial runs near the County airport and would be much more impacted by the noise from air traffic and the nearby industrial park than the project. DEIR Figures 4.10-7 and 4.10-8 show that both daytime and nighttime noise generation of operations at the Brunswick Site would be well below 40 dBA at the Empire Mine site. DEIR Table 4.10-4 (General Plan Noise Element Exterior Noise Limits) shows that the County's noise standard applicable to recreation use is 70 dBA Leq during the hours in which the park would be open to the public (i.e., 7 am - 7 pm). As such, the project noise level of less than 40 dBA at the park site from Brunswick operations would be more than 30 dBA ***below*** the County's noise standard applicable to recreation uses. At the portions of the Empire Mine SHP nearest to the Centennial Site, predicted daytime noise levels are 27 dBA at the grasslands and 22 dBA at the nearest trail within the park. (DEIR Figures 4.10-7 and 4.10-8.) The noise levels at both locations are well below the County's 70 dBA daytime noise level standard. As a result, the Empire Mine SHP and the Loma Rica Trail, which are the only public recreational facilities somewhat near the project site, would not be adversely impacted by noise from operations at the Centennial Site.

Regarding impacts on the viewshed, the commenter infers that undue attention was given to views of the project site from public roadways at the expense of parks, trails and public lands. The project site is surrounded by undeveloped forested land, industrial, rural residential development, and commercial uses. (DEIR p. 4.1-1; see also Table 3-2.) As part of the Aesthetics Technical Study, public viewer groups and vantage points from the surrounding area were considered to assess how the public would perceive changes in site conditions associated with the proposed project. The vantage points include public views considered to be the most visually sensitive locations. The commenter does not name any park, trail or public land that has a view of the project site, because none of the parks or trials in the general vicinity of the project have

line-of-sight to either the project site or any anticipated project operations, and the views from any of the listed facilities would not be impacted by the project. (DEIR p. 4.11-8)

Response to Comment Ind 382-18

Please see Master Response 1 - Non-EIR/Administrative issues, and Master Response 2 - Social and Economic Impacts.

Regarding noise, DEIR Chapter 4.10 analyzed the proposed project's potential impact on noise impacts to existing sensitive receptors in the area of the project and haul route. The determination of a noise impact is not dependent on the type of person who may hear a sound (e.g., resident vs tourist) but rather if proposed project noise levels either exceed County standards or significantly increase the ambient noise condition. This proposed project's impact on noise was analyzed in DEIR Chapter 4.10, which found that temporary construction noise would be significant and unavoidable, but that other noise impacts form the project were less than significant after implementation of mitigation.

Response to Comment Ind 382-19

The commenter believes the DEIR should include an analysis of psychological damage to the population who may be exposed to project sound even if noise thresholds are not exceeded. The standards of significance utilized for this DEIR were not arbitrarily selected so as to ignore the psychological effects of noise or to be favorable to the Project Applicant. Rather, the County's adopted noise standards, the CEQA Guidelines and Appendix G criteria, as well as the vibration criteria utilized in the project DEIR, were developed to specifically protect residents and other sensitive receptors from the harmful and annoying effects of noise and vibration, and they are consistent with standards recommended by the state of California for the development of community noise control ordinances. Although the noise evaluation did present information pertaining to the maximum noise generation of the project, as required by County policy, it also evaluated the effects of the project in terms of the County's average hourly noise level criteria and additionally evaluated potential impacts relative to baseline ambient noise conditions, per CEQA requirements. As noted in responses to other noise-related comments, the applicant will be required to conduct extensive noise monitoring following commencement of operations to ensure that the appropriate noise criteria are being satisfied during daytime, evening and nighttime hours. (DEIR p. 4.10-50.)

Response to Comment Ind 382-20

The commenter asserts that water from areas outside of the mineral rights area may be drained of groundwater as a result of the project, that the water from other nearby mines may flow into the project mine works, and that the water may flow through some new path into the environment without proper treatment. The historical Empire mines and other mines are separated from the Idaho-Maryland mine by low permeability rock without any direct hydraulic connections and there is no direct flow from these historical mines to the future Idaho-Maryland mine workings. Please see Itasca Clarification Memo attached to the Final EIR as Appendix O.

In reference to rock fracturing, mining uses explosives to break rock into smaller pieces so it can be moved. The small amounts of explosives used in mining do not open cracks and fissures beyond the immediate vicinity of the blast itself and would not open cracks outward or toward other mines, allowing water to flow from outside areas into the mine. As discussed in Section 4.2 of Appendix M, the breaking of rock includes drilling a number of parallel holes in the mine face. Generally, one or more of these drillholes are located near the center of the drill pattern and used as void or "relief" holes (open holes not loaded with explosives). The holes drilled around that hole are then loaded with explosives and are set off. That first hole "relieves" the blast, and allows

the least amount of explosives possible to break the first rock out of the mine face. The remaining holes located around the first blast are then initiated using a series of delays to progressively enlarge the blasted area until the final dimensions and profile of the drift are created. Any fracturing of rock outside of the blasted excavation is limited to a very few inches beyond of the drill hole and therefore the process cannot create the extensive cracks or fissures envisioned by the commenter.

The DEIR analyzed potential groundwater drawdown in Chapter 4.8, and concluded that impacts to water supply would be less than significant after mitigation. Please see Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Ind 382-21

The commenter asserts that mine timbers in the existing underground mine may fail and collapse after the mine is dewatered and that erosion may result from the project. Additionally, the commenter asserts that water wells outside the expected impact area may fail causing uncertain liability for water replacement. Certain areas of the mine (primarily in the Idaho mine workings) used timber historically for ground support in tunnels. These workings may be already caved or may remain open. As the commenter notes, the flooded state of the mine, and resulting low oxygen, prevents the timber from rotting and the dewatering of the mine could cause these timbers to degrade and possibly lead to a certain tunnel collapsing. However, even if such an event occurred, the tunnels are too deep to cause subsidence at surface. Please see Master Response 29 – Near surface Workings.

Water flow, erosion, water quality, and well dewatering is extensively discussed in the DEIR and includes discussion on regulatory requirements and mitigation measures. Please see Chapter 4.8 of the DEIR.

The DEIR analyzed potential groundwater drawdown in Chapter 4.8, and concluded that impacts to water supply would be less than significant after mitigation. Please see Master Response 14 - Adequacy of Groundwater Model. The DEIR's conclusions regarding water supply and drawdown were peer-reviewed by the County's independent expert, West Yost, who concurred with the DEIR's conclusions. Mitigation Measure 4.8-2(a) requires a groundwater monitoring plan that includes installation and monitoring of numerous groundwater monitoring wells to detect drawdown impacts before they become significant enough to affect well owners. Additionally, Mitigation Measure 4.8-2(b) requires the applicant to be responsible for replacing water for any impacted wells beyond the expected drawdown impact area. Moreover, Mitigation Measure 4.8-2(c) requires the applicant to construct and pay for the connection of 30 parcels to potable water supply, including payment for water charges during the life of the project or until the parcel is sold or annexed into the City of Grass Valley. As such, the DEIR provided mitigation sufficient to mitigate the project's water supply impacts, even if the drawdown area is greater than expected.

Response to Comment Ind 382-22

The commenter summarizes its comments as set forth in the comment letter. Please see Responses to Comments Ind 382-1 through Ind 382-21. The commenter's generally noted concern related to toxic materials is too general to warrant a specific response – Please see Master Response 1.

Individual Letter 383

John Hellwig
311 Park Avenue
Nevada City, CA 95959
530-205-6670

April 2, 2022

Matt Kelley, Senior Planner
County of Nevada
950 Maidu Avenue
Nevada City, CA 95959

Re: Draft EIR of Idaho-Maryland Mine Project

Dear Mr. Kelley:

I am a long-term resident of Nevada County. My family moved here in 1970 when I was a teen, and I have spent the majority of the intervening 52 years here in the Grass Valley / Nevada City area. Over the last 20 years, I raised my family here.

Ind 383-1 Professionally, I have had a 40+ year career in technology research and development, having held senior technical and management positions in several technology companies. I have a Bachelor's degree in Mechanical Engineering from UC Davis and a Masters in Business Administration from UC Berkeley.

I am writing to you today to voice my deep concern about the highly inadequate Draft EIR that has been submitted in support of the proposed Idaho-Maryland Mine Project. The analysis is flawed in several ways, a few of which I briefly summarize below.

Ind 383-2 Hazardous Materials -- the DEIR essentially ignores the disposition of existing waste rock and tailings at the Centennial site, known to be contaminated (through mining operations) with lead, arsenic, nickel and mercury at concentrations above California hazardous waste levels. The DEIR assumes these wastes to be magically cleaned up. Further, the analysis fails to describe how future waste rock and mine tailings will be managed to prevent toxic hazards to people and the environment.

It is widely understood that historical mining in the Sierra foothills left a devastating legacy of toxic waste in the environment – which is the reason that the Centennial site sits contaminated today. Do we really want to surface untold additional tons of toxic mine rock and tailings for the next 80 years?

Ind 383-3

Groundwater and Domestic Wells – The proposed project would lower groundwater levels in the mine by over 3000 feet, essentially acting as an enormous extraction well for the next 80 years. This will likely have a profound impact on hundreds of households and businesses relying exclusively on groundwater, and in turn, on their livelihoods and property values. Yet, the DEIR concludes, based on inadequate groundwater data, unreliable mathematical models of non-homogenous bedrock fractures, and insufficient monitoring wells, that impacts to wells will be insignificant, other than to a small number of wells in the East Bennett area. The DEIR does not adequately support this conclusion.

Many people in Nevada County are already having serious (and expensive) problems with diminishing production in wells associated with extended drought. Do we really want to drain the remaining groundwater in a large part of the Grass Valley area?

Ind 383-4

Air Quality – According to the DEIR, unmitigated emissions of NOx, reactive organic gases and respirable particulate matter would exceed certain air quality thresholds established by the Northern Sierra Air Quality Management District, during construction and the 80-year life of the project. This constitutes a potentially significant air quality impact that should be mitigated. However, there is no evidence in the DEIR that such impacts will be mitigated to a level less than significant. Additionally, the DEIR lacks substantial evidence to support its conclusions pertaining to health risks associated with toxic air contaminants such as asbestos, silica and heavy metals.

Our air quality here in western Nevada County is already very poor – and getting worse with the increasing numbers of fires due to climate change. Do we really want to add another generator of bad air in the immediate vicinity of Grass Valley for the next 80 years?

Ind 383-5

This mine proposal and its associated DEIR have very real deficiencies that portend material, negative impacts on thousands of local residents. The DEIR must be rejected in its current form.

Thank you for your consideration.

Sincerely,

John Hellwig

INDIVIDUAL LETTER 383: JOHN HELLWIG

Response to Comment Ind 383-1
This comment is introductory in nature and the commenter states generally that the DEIR is inadequate. Responses to specific comments are provided below.

Response to Comment Ind 383-2
The commenter states that the DEIR fails to discuss the existing contaminated materials at the Centennial Industrial Site and how the site will be remediated. The commenter also states that the DEIR fails to mention how future waste rock (engineered fill) will be managed to prevent toxic hazards. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 383-3
The commenter states that the DEIR understates the impacts associated with the dewatering of the mine but does not specify how the DEIR is inadequate. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 383-4
The commenter states that certain unmitigated emissions would exceed NSAQMD's criteria. However, according to the NSAQMD, the DEIR's implementation of Mitigation Measures 4.3-1(a) and (b) would reduce these impacts to less than significant. (DEIR, p. 4.3-73.) The commenter also states the DEIR lacks substantial evidence regarding health risks associated with toxic air contaminants but does not state why. Health risk impacts of the project have been analyzed in the DEIR and are less than significant after mitigation. Please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds, Master Response 19 - NSAQMD Criteria Pollution Thresholds during Operations, Master Response 20 - Conservatism of Metals Assumptions, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 383-5
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 384

To Matt Kelley, Senior Planner

NO to the Idaho-Maryland Mine Project

Public Comment from residents at 12223 Gayle Ln, Nevada City
02/11/2022

Reasons for our objection

Ind 384-1

I, John O'Shea, have a business in the Nevada County airport which is in close proximity to the proposed mine; my family also lives on lower Banner Mountain. I have noticed in the last couple of years that the traffic on Brunswick Rd has gotten hectic, especially in the morning and from 3pm and afterwards. I don't see how this mine is going to benefit the traffic in the area when there is going to be an additional 300+ vehicles/trucks in the area.

Ind 384-2

"Mining by it's nature consumes, diverts, and can seriously pollute water resources." In a state where water is already a scarce resource because of the endless drought that is seemingly only going to get worse, we can not afford to gamble on our already strained water resources just to line the pockets of a handful of people that don't even live in this county.

Ind 384-3

Have we not learned anything from history? The destruction is evident around the Sierra Nevada mountain range from the various types of mining that have been done over the years. Land scars where vegetation struggles to grow, heavy metal contamination and leaching continue to affect the health of local populations of people and animals. It is absolutely crazy that anyone is willing to disturb and destroy an immense amount of land to hope to find a tiny amount of gold.

Ind 384-4

The men and women who will be working in this proposed mine will be subject to intense health problems directly caused by the hazardous conditions and chemicals/materials that are a standard part of mining in general. Mining accidents and deaths in the last few years have been all over the news, in worldwide locations and seem to be more common than mine owners want the public to know about.

Ind 384-5

The environmental impact of re-opening this mine will be lasting on Nevada County long after the mining has stopped. The heavy machinery emissions alone should be cause for concern. Climate change and the wildfires have affected Nevada Counties air quality already, and having the mine reopen will make our air quality, water quality, and the overall quality of life for residents here impacted negatively for possibly the rest of our lives.

Ind 384-6

I want to reiterate the point that the proposed re-opening of this mine, and all of the disruption and processes that come with it, will only be serving to enrich a small amount of individuals; while sacrificing the quality of lives for tens-of thousands of Nevada County residents for years to come, something we have seen historically from other rural places where mining was prevalent, time and time again.

Ind 384-7

On top of this, if the mine is re-opened and they go down and find an insignificant amount of gold to keep operations going, it is my understanding that the county will ultimately have to clean up the mess that is left behind after the company has declared bankruptcy.

Please vote no on reopening the Idaho-Maryland Mine project.

INDIVIDUAL LETTER 384: JOHN AND MELODY O'SHEA

Response to Comment Ind 384-1
Traffic is analyzed in Impacts 4.12-1, 4.12-2, and 4.12-3, which start on pages 4.12-56, 4.12-67, 4.12-69, respectively, of the DEIR. The commenter expresses general concerns regarding traffic but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 384-2
Please see Master Responses 2 and 13 through 16. The commenter expresses general concerns regarding water supply but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 384-3
Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 384-4
Please see Master Responses 18 through 23. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 384-5
Please see Master Responses 1, 6, and 16, as well as 18 through 23. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 384-6
Please see Master Responses 1 and 2.

Response to Comment Ind 384-7
Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 385

From: John Palmer
To: Idaho MMEIR
Subject: No mine!
Date: Thursday, March 10, 2022 10:32:54 AM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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Ind 385-1

Imagine you're on the Nevada County Board of Supervisors and you vote to allow Rise-Gold to reopen the Idaho-Maryland Mine. Years pass. You're an old man in a nursing home now. A pall of dust and smoke hangs over the area from the ongoing mining operation. The constant thumping of the rock crusher can be heard and felt twenty-four hours a day. Wolf Creek is essentially dead from the effects of millions of gallons of toxic mine water. Wells in the area have gone dry. Roads are pot-holed and congested from all the mine trucks and equipment. Brunswick Basin is a ghost town. Mill Street is deserted. Residents have either fled the area or are hunkered down to avoid the disaster the mine has wrought. Your granddaughter comes to visit you; she's in high school now. She says, "Grandpa, we learned about the reopening of the Idaho-Maryland Mine in history class today. We learned that you voted in favor. Grandpa, why were you so stupid?"

Sent from my iPhone

INDIVIDUAL LETTER 385: JOHN PALMER

Response to Comment Ind 385-1

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 386

From: john purchase <otterpurchase@gmail.com>
Sent: Tuesday, March 29, 2022 2:29 PM
To: Matt Kelley
Subject: IMM DEIR feedback

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Matt,
My particular interest is the issue of air quality and noise at the centennial site. The thought of 1000 tons/day of toxic dust laden tailings being hauled down winding bennett road and then dumped at centennial site is appalling. I am a recent survivor of a deadly form of sinus cancer. No doubt the cause was due to inhaling toxic dust decades ago. Luckily I had good health insurance to foot the $500k in medical expenses at stanford. The grading and compacting of this hill of tailings over a 5 year period will generate massive noise and toxic dust laden air in an increasingly dense residential area bordering grass valley city limits. Decades from now the legacy will be only sickness and death. It appears to me that the centennial site is an optional element of the project. If the mine tailings can be confined to the brunswick site it will have a less severe impact on neighborhood air quality and noise levels. Can you please be more explicit on this point in DEIR.

Ind 386-1

Sincerely,
John Purchase
10412 mercury drive
Grass Valley, Ca. 95945
831-345-7620

1

INDIVIDUAL LETTER 386: JOHN PURCHASE

Response to Comment Ind 386-1

Please see Master Response 1 – Non-EIR/Administrative Issues and 18 through 23 regarding air quality, as well as the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR.

In addition, please see the analysis under Impact 4.3-2, which evaluates potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations, starts on page 4.3-78 of the DEIR, and includes a health risk assessment, the results of which are summarized in Table 4.3-21 on page 4.3-80 of the DEIR. Because the potential impact is concluded to be significant without mitigation, the DEIR sets forth Mitigation Measure 4.3-2 to ensure project consistency with the CARB Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations by requiring preparation and implementation of an Asbestos Dust Mitigation Plan (ADMP).

Alternatives to the proposed project are addressed in Chapter 6, Alternatives Analysis of the DEIR. Alternative 2 eliminates the Centennial Industrial Site and expands the Brunswick Fill Site. Discussion of this Alternative begins on page 6-21 of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

From: John Reeder
To: bdofsupervisors
Subject: opposition to proposed mine
Date: Sunday, February 13, 2022 11:20:33 AM

Individual Letter 387

Dist 1

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Supervisors,

Ind 387-1 I reside in Nevada County district 1, and I am a retired physician who practiced Pediatrics in town from 1980 through 2016. I am writing to express my strong opposition to the proposed mine project.

Ind 387-2 In particular, living near the mine site and depending on a well, I worry about the unknowable negative impacts on local hydrology. But beyond that, the glaring negative impacts on traffic, noise, and local aesthetics would be completely unjustified by any imagined advantage to our neighborhood or the county at large.

Ind 387-3 The environmental qualities and advantages that draw us to Nevada County should not be placed at risk without a clear and strong justification. I see no reason why any citizen or supervisor would consider this major mining project attractive enough to jeopardize those qualities and advantages. In short, the purpose of the mine seems to be solely corporate profit and greed.

Among all the things this county needs now, and the world at large needs now, more gold is certainly not high on the list of priorities.

John Reeder MD
12677 Jack Pine Rd
Grass Valley

INDIVIDUAL LETTER 387: JOHN REEDER

Response to Comment Ind 387-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 387-2

Please see Master Response 1. The commenter expresses general concerns regarding impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 387-3

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 388

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 02/28/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

Ind 388-1 My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

Ind 388-2 I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center[1] (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft^2 Business Park, 242,000 ft^2 for Service Business/Light Manufacturing and 238,000 ft^2 for Industrial uses[2].

Ind 388-3 I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

Ind 388-4 The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"[3] is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative[4] contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

Ind 388-5 In the summary section for the NCBIC alternative[5], the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NBCIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project[6] and almost none of the traffic hauling toxic waste.

Ind 388-6 The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is

[1] DEIR page 6-11, Nevada County Ordinance 1853, February 1994
[2] DEIR page 6-11/12
[3] DEIR page 6-8
[4] Beginning at the bottom of Page 6-11
[5] Bottom of Page 6-13, last 2 paragraphs before "Reduced Hours"
[6] 118 round trips, see Table 4.12-8, page 4.12-34

REC'D
MAR 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills) require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.[7] Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility "would potentially create noise similar or greater to the proposed project." Frankly, that's hard to believe as there was a saw mill and planing mill at that site for decades.[8]

Ind 388-7 Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.

Ind 388-8 Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars[9]. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Ind 388-9 Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Ind 388-10 Virtually all of the businesses listed in "Examples of Permitted Uses"[10] already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a "No Project" alternative with the NCBIC as the best outcome.

Ind 388-11 Assigning a "not feasible" label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I'm not saying that the NCBIC should be built now (or ever), that's not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Ind 388-12 Rise Golds advertising "postcard" claims the "Science is Clear". That's debatable given that much of their science is based on assumptions and forecasts. The same postcard claims are there are "no significant impacts" while the DEIR clearly states there are "Significant and Unavoidable" impacts.

What is clear is this is the wrong project for Nevada County.

I urge you to vote NO on this project.

---

[7] While PRIDE's facility was considered too small we were awarded the HP contract, and kept it for years, because of HP's commitment to PRIDE's mission to create jobs for people with disabilities.
[8] There is already a custom milling operation at 11429 East Bennett Rd - Freds Custom Milling and Lumber
[9] www.cleanairtrust.org/trucks.dirtytruth.html
[10] DEIR pages 6-12/13

Thank you.

John J. Vaughan
11793 Lower Colfax Rd
Grass Valley, CA 95945
District III Voter
916-807-0430 Cell
jvaughan1946@gmail.com

CC: Director of Planning Brian Foss
Matt Kelley, Senior Planner
Principal Planner Tyler Barrington

INDIVIDUAL LETTER 388: JOHN VAUGHAN

Response to Comment Ind 388-1
The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 388-2
The alternative proposed by the commenter was discussed on pages 6-11 to 6-13 of the DEIR, but was dismissed from further consideration because the surface uses are reasonably anticipated to be more intense and cause more impacts than the proposed project. This would be contrary to CEQA's objectives for an alternative, which is to avoid or substantially lessen any of the significant effects of the project (Section 15126.6(f)). Therefore, this alternative is rejected from further consideration. Comment noted.

Response to Comment Ind 388-3
The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Ind 388-4
The commenter asserts that the DEIR is incorrect in its assessment of impacts from uses that are permitted under the current M1-SP zoning, but does not provide specific examples. Please see Master Response 1.

Response to Comment Ind 388-5
The commenter asserts that the traffic impacts and related traffic noise under existing zoning would be less than the project because the vehicles would be passenger cars, small trucks with less large trucks and less trips. The commenter appears to focus on only the less intense permitted uses, but does not acknowledge that the existing zoning allows heavy industrial uses such as large wholesaling and distribution facilities, lumber yards, auto dismantling yards, milling and planing facilities, and contractor equipment and storage yards, among other industrial uses. These types of uses (large wholesaling and distribution facilities, for example) involve far higher volume of heavy truck traffic than proposed by the project, and many of the permitted uses would involve greater noise impacts as the facilities (e.g., milling and planing facilities, auto dismantling) would be on the surface rather than underground as proposed for many aspects of the project.

Response to Comment Ind 388-6
The commenter speculates that many of the more intense uses that are permitted under the current zoning (e.g., distribution facilities and auto dismantler) are not likely to be constructed and should be eliminated from the DEIR's consideration. However, the commenter does not provide evidence as to this opinion other than noting the distance from freeways. Accordingly, the elimination of numerous permitted use categories from consideration of potential impacts is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary. The commenter states that a milling and planning facility would not be as loud as the project, but offers no evidence of that assertion besides pointing out that a saw mill and planing mill existed on the site for decades. Many of the project's noise-generating activities are underground or enclosed within buildings, which is not acknowledged by the commenter in its comparison. The commenter's opinion that a much lighter

mix of land uses would actually occupy the Brunswick site under existing zoning is speculation and is not substantial evidence under CEQA. Nevertheless, the comment has been forwarded to the decision makers for their consideration.

Response to Comment Ind 388-7

Please see Response to Comment Ind 388-6.

Response to Comment Ind 388-8

Please see Response to Comment 388-6.

Response to Comment Ind 388-9

The commenter asserts that aesthetic impacts could be easily mitigated under an existing zoning alternative. Whether aesthetic impacts could be mitigated to less than significant would depend on the layout and height of the actual buildings and facilities proposed under the existing zoning, or in the case of an auto dismantling yard, the extent and type of screening around the facility. Given that the landscape could change to more intense uses and would be visible from public viewpoints, similar to the project, aesthetic impacts may be similar under the commenter's proposed alterative.

Response to Comment Ind 388-10

The commenter's opposition to the project and preference for the No Project alternative is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 388-11

The commenter appears to believe that the existing-zoning alternative was rejected because it was infeasible. However, as discussed on page 6-13 of the DEIR, this alternative was rejected because it could result in more intense uses and environmental impacts as compared to the project, which would be contrary to CEQA's objectives for an alternative. Please see Response to Comment Ind 388-6.

Response to Comment Ind 388-12

The commenter's opposition to the project is noted for the decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 389

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 02/28/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center[1] (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft² Business Park, 242,000 ft² for Service Business/Light Manufacturing and 238,000 ft² for Industrial uses[2].

Ind 389-1

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"[3] is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative[4] contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative[5], the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NBCIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project[6] and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills)

[1] DEIR page 6-11, Nevada County Ordinance 1853, February 1994
[2] DEIR page 6-11/12
[3] DEIR page 6-8
[4] Beginning at the bottom of Page 6-11
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I urge you to vote NO on this project.

Thank you.

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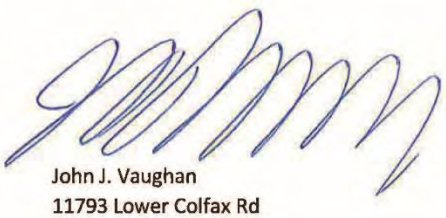

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CC: Matt Kelley, Senior Planner

INDIVIDUAL LETTER 389: JOHN VAUGHAN

Response to Comment Ind 389-1

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.

Individual Letter 390

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Date: 02/28/2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

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We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center[1] (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft^2 Business Park, 242,000 ft^2 for Service Business/Light Manufacturing and 238,000 ft^2 for Industrial uses[2].

Ind 390-1

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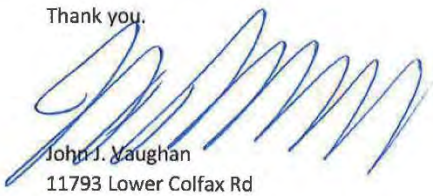

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950 Maidu Avenue, Suite 170
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Date: 02/28/2022

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Response to Comment Ind 391-1

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Individual Letter 392

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NEVADA COUNTY
PLANNING DEPARTMENT

Nevada County Planning Commission
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Date: 02/28/2022

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Response to Comment Ind 392-1

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Individual Letter 393

Matt Kelley, Senior Planner 03/24/2022
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Subject: Idaho-Maryland Mine Project Draft Environmental Impact Report

Dear Mr. Kelley,

Please include my project-specific comments and questions in response to the Rise Gold Idaho-Maryland Mine Project Draft Environmental Impact Report (DEIR).

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

Ind 393-1

I have a number of issues, comments and questions about the adequacy of the DEIR, which is missing key information, underestimates significant negative impacts and proposes inadequate mitigation measures.

This document is organized in categories of "Issues" which are followed by factually supportive commentary, which are then followed by questions, based on the commentary, related to the issue I am concerned about regarding the inadequacy of the DEIR.

Issue #1: Water Supply for well owners:

I have serious concerns about how this proposal impacts wells in the area, including those properties not included in the DEIR, outside the studied area along East Bennett Rd.

This project will dewater to a depth of 3200 feet[1], including initial dewatering for approx. 6 months, removing over 815 million gallons, followed by maintenance dewatering, removing 450-750 million gallons/year. **That's over 1 BILLION gallons during the first year** (Enough to cover 43,560 square feet with column of water 3,685 feet deep[2]) **and over 40 billion gallons for the life of the project**. The DEIR acknowledges the significant and unavoidable negative impact of this dewatering but only in the small footprint of East Bennett Rd.

Ind 393-2

In a Fox40 news video from mid-March 2022[3], Ben Mossman, CEO of Rise Gold, talks about the maps used for modeling the tunnels are from the "World War II era". The reporter notes the maps reveal "nearly 100 miles of tunnel". It makes no sense that removing 40 billion gallons of water will have no negative impact on water availability in an area much broader than East Bennett Rd. The level of our aquifers are already at risk from years of drought behind and likely ahead of us.

The DEIR notes "the proposed project would result in substantial reduction in groundwater supplies"[4]. For well owners not serviced by NID, this is a "Significant and Unavoidable" issue. The DEIR does require mitigation where properties along East Bennett would be serviced by NID. But that does not solve the

[1] DEIR page 4.8-54
[2] 3,685 acre feet is the same as one acre covered in 3,685 feet of water. One acre = 43,560 square feet.
[3] www.youtube.com/watch?app=desktop&v=o6HbA2C55ds&t=310s
[4] DEIR Chapter 6, Alternatives Analysis page 6-6

groundwater issue for other properties which are negatively impacted by groundwater loss where NID is not an option. For these properties, including ours, the impact is "Significant and Unavoidable". The mitigations required in the 1996 Use Permit for Emperor Gold and the 2008 Emgold Mining DEIR are a reasonable starting place for minimal mitigations that are needed today and should be added to the DEIR. These options are not mentioned in the Rise Gold DEIR.

Ind 393-3

The 1993 final report for groundwater modeling and underground mining at the Siskon Mine on San Juan Ridge, which was approved by the County, and which, just like the Rise Gold proposal, was based on the currently available science at the time, stated: "Water levels in water supply wells surrounding the site are predicted to undergo very little or no impact from mine dewatering." The predictions were wrong. In 1995, there was a breach of an aquifer discharging millions of gallons of water and mine waste into Spring and Shady Creeks. The breach also drained community wells including those of Grizzly Hill School and North Columbia Schoolhouse Cultural Center. In 1997, the Siskon Mine was closed. As the security bond money ran out years ago, Grizzly Hill School continues to pay thousands of dollars/year to maintain a treatment system to provide drinking water for students and staff.[5]

In January 1997, a containment dam at the abandoned Lava Cap Mine (just 5 miles from the Idaho Maryland Mine) failed, releasing ~10,000 cubic yards of arsenic-rich tailings into its watershed including Little Clipper Creek and Lost Lake. Evidence of unsafe mine-related arsenic contamination was found in Little Clipper Creek, Lost Lake, surrounding property and local water wells. The properties around the Little Clipper Creek have been deemed an EPA Superfund site.[6] Since this area was declared an EPA Superfund site, the homeowners have had to test their wells several times/year. To date, all this work has been done at taxpayers' expense. 21 years later, in 2018, a $32 million judgement was obtained against Elder and Sterling CentreCorp related to cleanup costs. No cleanup has started.

Ind 393-4

This February (2/28/2022), the United Nations Intergovernmental Panel on Climate Change published a report[7] on climate change showing that:

- "...we have zero years left to avoid dangerous climate change, because it's here."
- "...as many as three billion people around the world will experience chronic water scarcity...".
- "...ecosystems and all sectors of human society and human well-being fundamentally depends on water..."
- "A water crisis is already brewing in the Western United States. Multiyear drought has drained reservoirs and triggered unprecedented water cuts for the region."

On 3/18/2022, The Union newspaper published an article titled "Hot spring forecast: Drought deepens in West, flooding ebbs".[8] A few selected quotes include:

- "There is no relief in sight for the West's record-shattering megadrought..."
- "The reason the West is warming is climate change, especially over the multiple decade timeframe."
- "California has 1.5 million acre feet less water available than it did this time last year."
- "The more than 20-year megadrought...is the worst in 1,200 years and is stoked by...climate change..."

[5] www.sjrtaxpayers.org/history
[6] en.wikipedia.org/wiki/Lava_Cap_Mine
[7] www.cnn.com/2022/02/28/world/un-ipcc-climate-report-adaptation-impacts/index.html
[8] The Union, 3/18/2022, Page 5. Source NOAA Meteorologists"

The Nevada County Energy Action Plan, accepted by the Board of Supervisors by vote of 5-0 on 2/12/2019 states the following:[9]

> "...Nevada County...faces challenges associated with regional climate change...climate change poses an immediate and escalating threat to the region's environment, economic strength, and public health. The region is affected by more intense dry periods...and more frequent periods of drought in California...The region is also impacted by a higher proportion of precipitation falling as rain instead of snow...and ***shortages in runoff and water supply, as well as substantial changes in runoff patterns and timing. This will affect groundwater recharge..."*** [emphasis added]

Goal 3 in the Nevada County Energy Action Plan states: "Encourage the Efficient and Safe Transportation and Use of Water Resources". While this section focuses mostly on in-home efficiencies, it notes "water losses" a number of times. Pumping 1 billion gallons of water into Wolf Creek in the first year followed by half a billion gallons per year for the following 79 years is a very substantial "water loss". Some of that water can be reclaimed by a downstream NID water treatment plant but much of it will be "lost" to Nevada County as it flows to the ocean. Please explain how this project is consistent with the water loss goals in the Nevada County Energy Action Plan.

The NID Board Meeting on 2/9/2022 included an agenda item to review the Idaho-Maryland Mine Water Supply Assessment, prepared by Raney Planning and Management (RPM). NID Director Karen Hull, posed a question regarding the impact of climate change on the water models to Mr. Houmau Liu, Ph.D., P.E. from Itasca International, a subcontractor to RPM. Dr. Liu's credentials are impeccable[10]. His response was a detail review of his analysis, including the statement "...but definitely ***we did not look into extensive [impact] of climate change*** [emphasis added] because those are not defined into the future."[11] The DEIR must be amended to include analysis of multiple scenarios that will arise due to climate change over the next 80 years.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-5

- With over 100 miles of tunnels that have not been mapped since World War II and have not been accessed in over 66 years (1956), the DEIR lacks inclusion of the larger area of risk to residential wells included in both the 1996 and 2008 Use Permit/DEIR applications. Please explain.

Ind 393-6

- How will well owners know that an effective pre-dewatering assessment of all wells within and immediately surrounding the Rise Gold mineral rights boundaries will be performed by independent consultants?

Ind 393-7

- For the next 80 years:
  - What systems are in place to remedy a well that is negatively impacted?
  - How will reduced well output (gallons/minute) be monitored?
  - How will well recharging rates be monitored?
  - How will well contamination be monitored?
  - Who determines root cause of degraded well function?
  - Who determines liability?
  - How and how quickly will temporary water provisions be in place when a well fails?

[9] Nevada County Energy Action Plan, Chapter 1, page 6
[10] www.itascainternational.com/about/staff-bios/houmao-liu
[11] NID Board Meeting, 2/9/2022, Dr. Houmau Liu, General Manager/Principal Hydrogeologist, Itasca International

- Why are the properties of well owners burdened with losing what little assurances are currently proposed if they sell their property?
- What financial systems are in place to provide mitigation funding when issues arise?
- What steps are planned to avoid a disaster like the one at the San Juan Ridge Mine in 1995?
- What steps are planned to avoid a disaster like the one at the Lava Cap Mine in 1997?

Ind 393-8
- What is the justification for why properties with proposed replacement NID water service along East Bennet Rd are required to assume the cost of NID services if the property is annexed into Grass Valley or sold?

Ind 393-9
- How will the DEIR address the real concerns from well owners outside the limited study area along East Bennet?

Ind 393-10
- Why are the mitigations required in 1996 and 2008 not the baseline for the current DEIR analysis?

Ind 393-11
- How has the failure, huge negative impacts, on-going costs and lessons learned from the Siskon Mine in North San Juan been factored into the analysis of the Rise Gold mine?
- How has the failure, huge negative impacts, on-going costs and lessons learned from the Lava Cap Mine been factored into the analysis of the Rise Gold mine?

Ind 393-12
- Will Nevada County provide inspectors and support systems to oversee well monitoring, potential contamination and reaction to a spill? If so, who pays these salaries?

Ind 393-13
- If "self-monitoring" and reporting is used, who audits the process used to develop the reports? If audits are performed, how often and who pays the salaries of the auditors?

Ind 393-14
- Why are water models for 80 years when the models are based on maps from the 1940's and "did not look into the extensive impact of climate change because those are not defined into the future"?[12]

Ind 393-15
- What steps are being taken to ensure the water models are correct, taking into consideration the "immediate and escalating threat of climate change amid the worst megadrought in 1,200 years?

Ind 393-16
- Have other hydrologists been consulted for peer review of the water models?

Ind 393-17
- Given that Nevada County knows in advance from the DEIR that "*the proposed project would result in substantial reduction in groundwater supplies*" and knows from the Nevada County Energy Plan that climate change will create "*shortages in runoff and water supply, as well as substantial changes in runoff patterns and timing. This will affect groundwater recharge*". How can the County justify removing 1 billion gallons of water in the first year followed by half a billion per year for the next 79 years?
- What specific steps is Nevada County taking to avoid liability for the above issue?
- What are the additional County liability insurance costs related to approval of this project?
- How are the costs for additional liability passed down to property owners in the county?

Ind 393-18
The FEIR needs to analyze all the wells potentially impacted by the project. The DEIR impact analysis on wells outside of Ease Bennett Rd is incomplete and proposes inadequate mitigation measures.

Ind 393-19
For the above reasons, re Issue #1: Water Supply for well owners, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24 and is as out of compliance with the Nevada County Energy Action Plan. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-20
Issue #2: Lack of inclusion and detailed review of the Nevada County Business and Industrial Center[13] (NCBIC) alternative: The last 20 years of my career were spent at PRIDE Industries in Roseville. The final

[12] NID Board Meeting, 2/9/2022, Dr. Houmau Liu, General Manager/Principal Hydrogeologist, Itasca International
[13] DEIR page 6-11, Nevada County Ordinance 1853, February 1994

10 years I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for the world's largest printer manufacturer. We operated a shipping, receiving and distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR lacks inclusion and detailed review of the NCBIC alternative, which with existing M1-SP zoning could include a 54,000 ft^2 Business Park, 242,000 ft^2 for Service Business/Light Manufacturing and 238,000 ft^2 for Industrial uses[14].

The DEIR Chapter 6 "No Project" section discussing "Alternatives Considered but Dismissed from Further Analysis"[15] is incorrect and incomplete. The analysis of the currently permitted NCBIC alternative[16] contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative[17], the DEIR concludes a negative impact and rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NCBIC alternative vs. the Rise Gold mine. Those assumptions are wrong. Unlike the Rise Gold project, in virtually all cases for the types of businesses that would actually locate there (using existing zoning) the traffic and noise would be comprised largely of passenger and small trucks operating in daytime, mostly weekdays and not 24x7. Diesel truck traffic would be substantially less than the 236 trips/day for the Rise Gold project[18] and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills) require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small[19]. Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same diesel truck traffic as the Rise Gold mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility "would potentially create noise similar or greater to the proposed project." Frankly, that's hard to believe as there was a saw mill and planing mill at that site for decades and there is already a custom milling operation at 11429 East Bennett Rd (Freds Custom Milling and Lumber).

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[14] DEIR page 6-11/12
[15] DEIR page 6-8
[16] DEIR beginning at the bottom of Page 6-11
[17] DEIR bottom of Page 6-13, last 2 paragraphs before "Reduced Hours"
[18] 118 round trips = 236 trips, see DEIR Table 4.12-8, page 4.12-34
[19] While PRIDE's facility was considered too small we were awarded the HP contract, and kept it for years, because of HP's commitment to PRIDE's mission to create jobs for people with disabilities.

Ind 393-21

Re air quality and traffic: The impact on air quality would be greatly reduced with NCBIC tenants that reflect what would happen in the real world vs. the unrealistic scenarios in the DEIR. The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars[20]. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Ind 393-22

The DEIR discusses a "Project List"[21] noting 20 projects including "...those that would contribute to the impacts on the same environmental resources, infrastructure, or public services and facilities that would be impacted by the proposed project...". Table 5-1[22] summarizes the scale associated with these 20 projects showing 1,209 Dwelling Units, 23,300ft^2 Office, 119,676 ft^2 Commercial and 471,500 ft^2 Business Park/Industrial. Considering only the "Non-Residential" projects, a couple of items stand out:

1) There is business growth in Nevada County at a scale that could be easily accommodated at the NCBIC location. With the NCBIC option available, some of these or similar businesses would have likely considered locating there. None of them would have negative impacts that are "more intensive"[19] than the Rise Gold mine.
2) Generally speaking, people who live here understand business growth is good for the local economy. With the exception of the Dorsey Marketplace, which has a number of negative environmental impacts, I have not seen an "anti-growth" outcry from local residents and businesses regarding the projects noted in the "Project List".

The DEIR inaccurately states "As demonstrated below, development of the Brunswick Industrial Site[23] with industrial uses, consistent with the current M1-SP zoning, could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project."[24] The DEIR also notes that the "Environmentally Superior Alternative"[25] would be "Alternative 2, Elimination of the Centennial Industrial Site".

It is clear from my experience, as I am confident one would find from other experts, that the DEIR *does not demonstrate* what it claims. It can be reasonably expected and that with detailed review (vs. exclusion without review) the NCBIC would be found to be the "Environmentally Superior Alternative".

Virtually all of the businesses listed in "Examples of Permitted Uses"[26] already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. A reasonable model to follow would be to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a "No Project" alternative with the NCBIC as the best outcome.

[20] www.cleanairtrust.org/trucks.dirtytruth.html
[21] DEIR pages 5-4/7
[22] DEIR page 5-7
[23] Brunswick Industrial Site is synonymous with NCBIC
[24] DEIR page 6-11
[25] DEIR page 6-42
[26] DEIR pages 6-12/13

Assigning a "not feasible" label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-23

- Will the DEIR be updated to include real world scenarios for the NCBIC?
- If not, please explain in detail.
- From a review of the "Project List" noted above, it can be reasonably concluded that the NCBIC would *not* be "more intensive" than the Rise Gold mine. Please explain why the EIR reviews for the "Project List" were not considered before claiming the NCBIC is "not feasible"?
- If the "Project List" projects were contrasted and compared to the Rise Gold mine, please explain the specific areas in the DEIR where those comparisons were made and justified.
- What are the specific measurements, using real world scenarios for noise, traffic, aesthetics and air quality that were done prior to rejecting this alternative?
- If no specific measurements were done, what assumptions, using real world scenarios, were used as the basis to conclude that noise, traffic and aesthetics "could reasonably be expected to result in above-ground uses that are more intensive in certain respects than the proposed project."[27]?
- Why does the DEIR claim "As demonstrated below...could reasonably be expected"[17] when no actual review of real world scenarios was conducted?
- Without detailed review of the NCBIC how can it be reasonably concluded that "Alternative 2, Elimination of the Centennial Industrial Site" is the "Environmentally Superior Alternative"?

For the above reasons, re Issue #2: Lack of inclusion and detailed review of the NCBIC alternative, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Issue #3: Negative Impacts: Few, if any, of the 83 negative impacts are fully eliminated by the required mitigations, they are only reduced. Look at the long list of negative impacts, especially the "Significant and Unavoidable" impacts listed in the DEIR[28].

Chapter 5, section 5-5[29] "Significant Irreversible Environmental Changes" of the DEIR notes that:

Ind 393-24

"An irreversible environmental change would be considered significant if ***any*** [emphasis added] of the following would occur:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally *commit future generations* [emphasis added] to similar uses (e.g., a highway provides access to a previously remote area);
- The project involves uses in which *irreversible damage could result from any potential environmental accidents* [emphasis added] associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves a wasteful use of energy).

The proposed project would likely result in, or contribute to, the irreversible environmental

[27] DEIR page 6-13
[28] DEIR pages 6-7/8
[29] DEIR pages 5-8/9

changes...".

Among the "Significant and Unavoidable" issues, the DEIR concludes traffic at "SR174/Brunswick" and "Brunswick Road/Sutton Way" cannot be mitigated. Average injury accidents/year for the last 3 years in Nevada County was 405 (CHP Data), including 13 fatalities. With "Significant and Unavoidable" traffic issues, it is statistically likely that more accidents will occur at these intersections.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-25

- Is it acceptable if only a few traffic accidents, including injuries and possibly fatalities, occur because of the Significant and Unavoidable traffic impact?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if water quality, water supply or property values go down for only a few residents?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if only a few residents have medical issues from the additional air pollution?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if we only have one toxic spill during the next 80 years?
- If yes, please provide justification for how this benefits Nevada County.
- Is it acceptable if only a few of the negative impacts have larger than planned repercussions?
- If yes, please provide justification for how this benefits Nevada County.

Ind 393-26

- Why are the significant irreversible environmental changes noted not considered "adverse environmental impacts" under CEQA?
- Please explain why this project should proceed, given there are "Significant Irreversible Environmental Changes" including "The project involves uses in which *irreversible damage could result from* ***any*** *potential environmental accidents* [emphasis added] associated with the project".

Ind 393-27

- Please explain why this project should proceed, given there are "Significant Irreversible Environmental Changes" and "The primary and secondary impacts of the project would generally commit future generations..."[30], including the grandchildren and great grandchildren of students currently enrolled in Nevada County, to the same use for *the next 80 years*.
- Why are projects even considered with negative Significant Irreversible Environmental Changes as well as Significant and Unavoidable issues?

Assuming even a few of these negative impacts and possible outcomes are *not acceptable*, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-28

Issue #4: Air Pollution:

Rise Gold proposes to purchase Carbon Offsets to mitigate greenhouse gas (GHG) emissions during construction[31] and notes "This shall include...for GHG reduction activities within the Nevada County region."[32].

- First, Carbon Offsets are an after the fact solution. Offsets purchased to mitigate GHG during construction "within the Nevada County region"[33] may be acceptable under CEQA, but may not

[30] DEIR pages 5-8/9. Also note this project spans 4 generations.
[31] DEIR Chapter 2, Table 2-1, item 4.3-7(b) Construction GHG Emissions Reductions, page 2-23
[32] DEIR Chapter 2, Table 2-1, item 4.3-7(b), page 2-24
[33] DEIR page 4.3-96

actually mitigate the negative impacts on the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley in a reasonable time-frame.

- Second, there will be on-going emissions from daily operations, not just during construction. For the years following construction, GHG emissions range from 7,000-9,000 Metric Tons(MT)/year[34]. The DEIR uses a threshold of 10,000 MT/year, after construction, to conclude that no mitigation is required. The Air Quality Districts used in the DEIR[35] are not similar to Nevada County and should not be used to set Nevada County's air quality thresholds.

On 2/28/2022, the United Nations Intergovernmental Panel on Climate Change (UNIPCC) published a report[36] showing that:

- "Greenhouse gas emissions will push warming to 1.5ºC"
- "The world is already 1.1 degrees Celsius warmer than before industrialization...We are now rapidly barreling toward 1.5 degrees."
- "Only by making deep cuts to greenhouse gas emissions, while also removing carbon dioxide from the atmosphere, can we halt the precipitous trend."
- "Bottom line is that we have zero years left to avoid dangerous climate change, because it's here."
- The chart in the above UNIPCC report shows that at current trends GHG emissions will reach 1.5ºC between 2030 and 2050, well before end of the Rise Golds 80-year project.

Ind 393-29

The California Air Resources Board classifies diesel particulate matter (DPM) as a toxic air contaminant, and estimates that about 70% of the cancer risk the average Californian faces stems from DPM.[37] The American Lung Association gives our community an F grade for ozone levels, designating 105 days per year "unhealthy."[38] During the last two years, wildfires contributed to entire weeks when the Northern Sierra Air Quality Management District labeled Nevada County's air quality "very hazardous." Ongoing climate change, with warmer and drier conditions, intensifies wildfires. Nevada County's air quality is certain to get worse even without the additional pollution from the Rise Gold mine.

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-30

- Besides Carbon Offsets, what is being done to monitor and mitigate the negative impacts of the Rise Gold project on increased GHG for the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley during construction?

Ind 393-31

- Why isn't Nevada County requiring the necessary research to determine the appropriate GHG threshold specifically for the Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley areas, including the negative impact of 7,000-9,000 MT/year of new GHG emissions added during the dangerously unhealthy air quality in the much longer fire and smoke seasons vs. using assumptions from other dissimilar counties?

Ind 393-32

- Given the already serious impacts of climate change, what specific steps will Nevada County take to ensure a net zero impact from this project vs. adding 7,000-9,000 MT/year to the problem?

Ind 393-33

- Understanding the changing impact of climate change for the next 80 years:
  - What is being done to mitigate the negative impacts of increased GHG on the people in and around Grass Valley, Nevada City, Alta Sierra, Lake Wildwood and Penn Valley?

[34] DEIR Chapter 4, Table 4.3-23, page 4.3-93
[35] DEIR pages 4.3-42/43
[36] www.cnn.com/2022/02/28/world/un-ipcc-climate-report-adaptation-impacts/index.html
[37] ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health
[38] www.lung.org/research/sota/city-rankings/states/california/nevada

- How will GHG emissions be monitored to ensure compliance?
- How will 7,000-9,000 MT/year of new GHG emissions added during fire season impact already poor air quality?
- What production mitigations, e.g. fewer diesel trucks/day, will occur at the Rise Gold mine when air quality as measured by the Northern Sierra Air Quality Management District for the Grass Valley, Nevada City, Alta Sierra, Lake Wildwood or Penn Valley areas is "very hazardous"?
- What mitigations will occur if parts of the proposed Rise Gold schedule changes (e.g., more trucks delivering Engineered Fill now vs. later), driving emissions over the thresholds noted in the DEIR?
- How will anyone outside of Rise Gold know about schedule changes that impact GHG emissions?
- Who will do the monitoring?
- How frequently will monitoring data be published?

Ind 393-34 For the above reasons, re Issue #4: Air Pollution, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-35 **Issue #5: Trips/Day**: There has been much talk about "100 trips/day" for large trucks which counts "round trips". It's actually 200 one-way trips/day for hauling mine waste plus 36 other large truck trips/day[39]. Each trip creates GHG emissions locally that won't be mitigated by Carbon Offsets from somewhere else in Nevada County. Diesel trucks generate up to 150 times the emissions of passenger vehicles.[40] Producing the same emissions as 236 large truck trips/day requires 35,400 trips/day from cars and light trucks. Following construction, Rise Gold is not required to provide any mitigation for GHG emissions comparable to as many as 35,400 passenger vehicles/day[41]. In addition, traffic issues at "SR174/Brunswick" and "Brunswick Road/Sutton Way" are "Significant and Unavoidable" and cannot be mitigated.[42]

The DEIR notes that the "Environmentally Superior Alternative"[18] would be "Alternative 2, Elimination of the Centennial Industrial Site" yet there are still "Significant and Unavoidable" issues for Transportation.[43]

Please respond to the following questions regarding the adequacy of the DEIR:

Ind 393-36
- Following construction, given the data for GHG "thresholds" is from counties dissimilar to Nevada County, why are no mitigations required for GHG emissions comparable to as many as 35,400 passenger vehicles/day?

Ind 393-37
- Given that the County knows in advance there will be injuries and possibly fatalities directly related to "Significant and Unavoidable" traffic issues, how does Nevada County justify the project at all?
- How will the County compensate victims of vehicle and pedestrian injury accidents and fatalities at intersections where the traffic impact from the Rise Gold project is "Significant and Unavoidable"?

Ind 393-38
- Given that the County knows in advance there will be injuries and possibly fatalities directly related to "Significant and Unavoidable" traffic issues, how does Nevada County avoid significant liability?
- What are the additional liability insurance costs related to approval of this project?

[39] DEIR Chapter 4, Table 4.12-7, page 4.12-33
[40] www.cleanairtrust.org/trucks.dirtytruth.html
[41] 236 truck trips/day x the equivalent 150 passenger vehicle trips, see www.cleanairtrust.org/trucks.dirtytruth.html
[42] DEIR, 4.12-8, 4.12-10, pages 5-11/12
[43] DEIR, Table 6-1, page 6-44

- How are the costs for additional liability passed down to property owners in the county?
- Why are projects even considered with negative Significant and Unavoidable issues?

Ind 393-39

For the above reasons, re Issue #5: Trips/Day, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Issue #6: Trust and Financial Stability: Trust and Financial Stability may not sound like *environmental* issues, but in fact are an overlay on all environmental issues and planned mitigations. How can the County trust an organization led by a CEO who walked away from the Banks Island Mine in British Columbia after they were caught dumping toxic waste, claiming (in part) that they were allowed to "discharge waste into the *environment* [emphasis added]"?[44] Anyone who would make such a claim or believe it's okay to dump toxic waste into the environment should not be allowed to run a project in Nevada County.

Re Financial Stability: The most recent Rise Gold Corp. Form 10-Q, including its wholly-owned subsidiary Rise Grass Valley Inc., filed with the Securities and Exchange Commission for the quarter ending October 31, 2021 says the following on Page F-5:

Ind 393-40

"The Company has incurred a loss of $212,300 for the three-month period ended October 31, 2021 and has accumulated a deficit of $19,756,777. The ability of the Company to continue as a going concern is dependent on the Company's ability to maintain continued support from its shareholders and creditors and to raise additional capital and implement its business plan. There is no assurance that the Company will be able to obtain adequate financing in the future or that such financing will be on terms advantageous to the Company. However, the Company has been able to obtain such financings in the past. The consolidated financial statements do not include any adjustments that might be necessary if the Company is unable to continue as a going concern. At October 31, 2021, the Company had working capital of $474,447 (July 31, 2021 - $956,524). As such, ***these material uncertainties cast a substantial doubt regarding the Company's ability to continue as a going concern*** [emphasis added]."

Page F-20 of the 10-Q document states:

"The Company expects to operate at a loss for at least the next 12 months. It has no agreements for additional financing and cannot provide any assurance that additional funding will be available to finance its operations on acceptable terms in order to enable it to carry out its business plan. There are no assurances that the Company will be able to complete further sales of its common stock or any other form of additional financing. However, the Company has been able to obtain such financings in the past. If the Company is unable to achieve the financing necessary to continue its plan of operations, then it will not be able to carry out any exploration work on the Idaho-Maryland Property or the other properties in which it owns an interest and its business may fail. As such, ***these material uncertainties cast a substantial doubt regarding the Company's ability to continue as a going concern*** [emphasis added]."

Please respond to the following questions regarding the adequacy of the DEIR:

[44] www.thenorthernview.com/news/witnesses-testify-in-court-on-banks-island-mine-disaster

- Why does the DEIR not address how Rise Gold plans to manage this project without the excuse that they were allowed to "discharge waste into the environment"?
- What is the specific plan for when a toxic spill occurs?
- Who takes action?
- Who does the cleanup?
- Who bears the cost?
- Who reviews and modifies procedures to ensure the issue is solved and will not occur again?
- If the answer to the previous question is Rise Gold, who will review their work to ensure the issue is solved and will not occur again?
- How and when will the public have access to information during and after a toxic spill?
- Given the "...substantial doubt regarding the Company's ability to continue as a going concern" are funds set aside in escrow, before any construction or dewatering starts, to cover the cost of:
  - all required mitigations for the life of the 80 year project?
  - cleanup following a toxic spill?
  - additional NID connections when wells in the Rise Gold mineral rights area but beyond the planned pipeline on East Bennett are negatively impacted?
  - water well replacement for property owners who do not have access to NID?
  - Emergency water supplies for wells that dry up from mine dewatering?
- Given the history associated with Rise Gold's CEO, what steps are in place to mitigate the conflict of interest associated with self-monitoring and accurate reporting to the County?

For the above reasons, re Issue #6: Trust and Financial Stability, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Ind 393-41

Issue #7: 80-Year Plan: The "80-year" plan is more than unrealistic. The grandchildren and great grandchildren of students currently enrolled at Nevada County schools will still be dealing with the fallout from this project. Rise Gold is owned by an investment group. All such groups have an "exit strategy" before they invest. That plan considers how to make a quick return on their investment. They will not be here for the long-term or to cover the cost of clean-up that will be required when something fails. That's why they declared **bankruptcy** in British Columbia but the "Management" bio for Ben Mossman at the Rise Gold website says "...he led...a **profitable** gold mine in British Columbia..."[45]. What that conflicting message means is they stayed long enough to make a profit for their investors and then bailed out.

Please respond to the following questions regarding the adequacy of the DEIR:

- When Rise Gold is sold to or merged with another mining company what plans are in place to ensure continued compliance and avoid concessions (e.g., the new company saying something like "we can't continue to operate if we have to continue various mitigations, so provide concessions or risk losing 300+ jobs")?
- What assurances do the people of Nevada County have that money is set aside now to cover the cost of clean-up and remediation when/if Rise Gold (again) declares bankruptcy?
- If money is set aside up front, what process is used to ensure it's enough for clean-up and remediation across the 80-year life of this project?

[45] www.risegoldcorp.com/management

- Please explain why this project should proceed given there are "Significant Irreversible Environmental Changes" and "The primary and secondary impacts of the project would generally commit future generations..."[46], including the grandchildren and great grandchildren of students currently enrolled at schools in Nevada County, to the same use for the next 80 years.

For the above reasons, re Issue #7: 80-Year Plan, this project is out of compliance with Nevada County General Plan Policy 17.14 and 17.24. Please provide a detailed explanation why this project should be allowed to proceed.

Issue #8: Incorporation by Reference: The DEIR document "3.0 Introduction to the Environmental Analysis"[47] notes incorporation by reference of the "Nevada County General Plan Final Environmental Impact Report, dated March 1995 (State Clearinghouse Number 1995102136)" and possibly a DEIR for Dollar General Stores from December 2016 (Dollar General is noted in the footer on all pages). This section refers to technical information "in the above referenced EIR" (the Nevada County General Plan Final EIR).

Ind 393-42

Please respond to the following questions regarding the adequacy of the DEIR:

- What are the specific places where items that are incorporated by reference are used in the Idaho-Maryland Mine Project DEIR?
- In each case, why is the information incorporated by reference?
- Also note that the County website link provided in the DEIR for the referenced document ["Nevada County General Plan Final Environmental Impact Report, dated March 1995 (State Clearinghouse Number 1995102136)"] is incorrect and should be www.mynevadacounty.com/1065/General-Plan.[48]

Nevada County's General Plan, as approved by the Board of Supervisors, following thousands of hours of work and thousands of dollars in cost, has the following four Central Themes:

- Fostering a rural quality of life.
- Sustaining a quality environment.
- Development of a strong diversified, sustainable local economy.
- Planned land use patterns will determine the level of public services appropriate to the character, economy and environment of each region.

Ind 393-43

Please provide detailed reasoning why the Rise Gold Idaho-Maryland Mine Project should be approved when:

- The DEIR includes "Significant and Unavoidable" issues, which by definition cannot be addressed.
- The serious concerns noted in my questions and commentary, re Issues 1-7 above have not been adequately addressed in the DEIR.
- Lack of compliance with
  - at least 2 Central Themes of the Nevada County General Plan
  - Nevada County General Plan Policy 17.14
  - Nevada County General Plan Policy 17.24 including "All other related impacts **shall** [emphasis added] also be addressed."

Ind 393-44

  - The Nevada County Energy Action Plan

Ind 393-45

[46] DEIR pages 5-8/9
[47] DEIR pages 3.0-2/3
[48] 1/28/22 email from Matt Kelley

Sincerely,



John J. Vaughan
11793 Lower Colfax Rd
Grass Valley, CA 95945
District III Voter
916-807-0430 Cell
jvaughan1946@gmail.com

Planning Commission Public Comments, 03/24/2022

My name is John Vaughan. I have been a resident of Nevada County since 1967. My wife Gail and I live at 11793 Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. We are District III voters.

Ind 393-46

The last 10 years of my career I was the Senior Vice President of Manufacturing and Logistics at a non-profit in Roseville with responsibilities including a distribution contract for the world's largest printer manufacturer, shipping millions of printer parts per year all over the world.

I have many concerns with the Draft EIR and am submitting my written comments today.

One that stands out is the lack of inclusion and review of a previously approved use for the Idaho Maryland site, which is the Nevada County Business and Industrial Center.

As already approved and zoned, this alternative could include a 54,000ft^2 Business Park, 242,000ft^2 for Service Business/Light Manufacturing and 238,000ft^2 for Industrial uses.

Ind 393-47

The Draft EIR wrongly concludes a negative impact and rejects this alternative assuming the impact would be the same or worse than the Rise Gold mine. Unlike Rise Gold, in virtually all cases in the real world, for the types of businesses that would actually locate there, the traffic would be comprised largely of passenger cars and small trucks operating in the daytime, mostly weekdays and not 24x7. Diesel truck traffic would be substantially less than the 236 trips per day for the Rise Gold project. The scale and location of this site would not support large Distribution Facilities, Auto Dismantlers or Planing Mills as claimed in the Draft EIR.

My written comments include more specific details about why the Draft EIR conclusions regarding the Business and Industrial Center alternative are inadequate.

To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense. I believe that with adequate review the Business and Industrial Center will prove to be the environmental superior alternative.

This is the wrong project for Nevada County.

Thank you for the work you are doing and for your time today.



Witnesses testify in court on Banks Island Mine disaster

Former safety manager shares photos of waste from the mine site spilling into the environment

SHANNON LOUGH / Sep. 26, 2017 5:30 a.m. / LOCAL NEWS / NEWS

Two years after the Ministry of Environment ordered Banks Island Gold Mine to shut down its operations for environmental infractions, the province is now taking the company's ex-president, mine manager and aquatic biologist to court.

One of the first witnesses to take the stand was former safety manager of the site, Brent Edmunds. With 40 years in the mining industry, Edmunds was hired in April 2015 and once on site, he said he saw many labour issues and he was alerted about uncontained spillage. In May 2015, he toured the site and took photos of liquid discharge from the mine.

"All these tailings were all over the place," he said to the

Northern View, a day after his testimony.

He took photos of mill tailings, waste product from the mine, leaking into a creek at one site, and flowing into a swamp and lake area at another site.

Edmunds said he made an anonymous tip regarding concerns he had over the health and safety of many of the Indigenous employees.

"It's only because of God's grace that some one was not killed there while they were operating," he said, regarding one incident in particular where he witnessed people going into the mine without ventilation.

"I felt powerless to stop it."

He said he also sent photos and documents to the Inspector of Mines, and included the Ministry of Environment in the email. In June, he returned home for his two weeks off and never returned to the site.

"I was fired because I was trying to do my job," he said.

RELATED: BANKRUPT MINING COMPANY NOW FACES 35 CHARGES FOR BANKS ISLAND MESS

In response to Edmunds, defence attorney, Chilwin Cheng said in an email that "Banks Island chose not to engage Mr. Edmunds after his probationary period ended. He was not dismissed. His departure coincided with the temporary layoff of a number of employees of Banks Island Gold after the government issued its shutdown order in early July."

The Yellow Giant Gold Mine on Banks Island within the

Gitxaała Nation was shut down on July 15 by the Ministry of Energy and Mines.

Former CEO of now-bankrupt Banks Island Gold Mine Ltd., Benjamin Mossman, as well as mine manager, Dirk Meckert, and aquatic biologist Allegra Cairns are facing 35 charges under the federal Fisheries Act, provincial Environmental Management Act and Water Act.

Mossmann and Meckert's attorney, Cheng, is asking the Crown counsel to drop the charges.

The defence claims they received a permit from the ministry containing an error that led to them to believe they were allowed to "discharge waste into the enviornment."

The Gitxaała Environmental Monitoring (GEM) team based in Prince Rupert has been attending the court case to report back to the community.

"GEM on behalf of Kitkatla Nation are happy to see it going to trial and we're watching it intently. We're interested to see what the results of the trial will be," said James Herbert, regulatory affairs manager, GEM.

Last week, aquatic biologist Cairns took the stand as the Crown's first witness, more testimonies are expected to come from the mining inspectors. The next court date is set for Oct. 10.

The Yellow Giant mining site on Banks Island is still under remediation. The Ministry of Energy, Mines and Petroleum Resources stated in an email that it had removed all hazardous materials by May 2016. In June 2017, the ministry set up a site-wide water quality monitoring program to

determine areas needing remediation.

Remediation has cost the ministry approximately $250,000 out of the $420,000 confiscated from Banks Island Gold Ltd.'s reclamation security deposit.

The ministry said it has shared the final reclamation and closure plan with the Gitxaała First Nation and will continue to work with them until the program has been completed.

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shannon.lough@thenorthernview.com

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Mine sediments flow toward a lake from the Yellow Giant Gold Mine on Banks Island. This photo was taken in June 2015 by former mine safety manager Brent Edmunds. (Brent Edmunds photo)

INDIVIDUAL LETTER 393: JOHN VAUGHAN

Response to Comment Ind 393-1

The commenter states the DEIR is inadequate. Please see Master Response 1 and the responses to specific comments provided below.

Response to Comment Ind 393-2

The commenter states that the DEIR acknowledges that dewatering will have a significant and unavoidable impact. This is incorrect, as the DEIR concludes that the project will have a less than significant impact with regard to dewatering and water supply after implementation of mitigation. The commenter asserts that the DEIR's mitigation does not address impacts to properties outside of the anticipated drawdown area. While the DEIR does not require installation of an NID pipeline beyond the 30 properties that are to be provided with the option of connecting to NID water supply, the DEIR does include a groundwater well monitoring plan designed to detect any unexpected drawdown impacts outside of the anticipated area of effect, and requires immediate replacement of water supply by the mine operator for any significant impacts to those wells pursuant to Mitigation Measure 4.8-2(b) and General Plan Policy 17.12. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and with regard to the commenter's reference to the Emgold and Emperor projects, see Master Response 13 - Historic Hydrogeologic Assessments.

As noted in Master Response 15, the applicant has also provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 393-3

The commenter references two different mining projects that resulted in unexpected water supply and water quality impacts. Notably, the proposed project is in a different location with different geologic settings than the referenced projects, so the impacts from those projects are not directly comparable. Nonetheless, the County has seriously considered the potential impacts of the project to water supply and quality, prepared thorough analysis of those impacts in Chapter 4.8 of the DEIR, imposed mitigation measures to ensure that any impacts are mitigated, and hired an independent expert to peer review and provide input on the analysis. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells. With regard to the commenter's concern over potential breach of a tailings dam, the project does not propose a tailings dam. Please see Chapter 3 of the DEIR.

Response to Comment Ind 393-4

The commenter provides information on climate change, drought and the Nevada County Energy Action Plan. Additionally, the commenter asserts that the DEIR did not adequately assess climate change, and cites a statement from Dr. Houmau Liu that Itasca did not look into climate change as part of the groundwater model. While the DEIR does consider variations in whether events such as multiple dry years and storm events, the impact of climate change in connection with the project is speculative; and therefore, not required to be analyzed under CEQA. Please see Master Response 16 - Drought and Climate Change, and Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 393-5

The commenter asserts that the existing mine tunnels have not been mapped since the World War II era, and therefore the DEIR did not adequately assess groundwater impacts to the larger area. The location of the underground mine works is documented in historic materials from the prior mining operations and was used as part of the groundwater model. There is no evidence to suggest that there are significant underground mine works that are unmapped or that these would change the groundwater analysis. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 13 - Historic Hydrogeologic Assessments.

Response to Comment Ind 393-6

The implementation of mitigation required in Chapter 4.8 of the DEIR to monitor groundwater levels and mitigate any impacts is under the authority of Nevada County, who has enforcement authority to ensure compliance. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As also noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 393-7

The commenter asks how the required monitoring and water replacement mitigation will be implemented. The implementation of mitigation required in Chapter 4.8 of the DEIR to monitor groundwater levels and mitigate any impacts is under the authority of Nevada County, who has enforcement authority to ensure compliance. Mitigation Measure 4.8-2(b) and General Plan Policy 17.12 require an immediate replacement of water supply at the expense of the Mine Operator. The threshold of significance for groundwater well impacts was determined in the DEIR to be a reduction of 10% of the well water column. See Chapter 4.8 and Appendix K.9 of the DEIR. The Well Mitigation Plan (Appendix K.9) has been modified to clarify actions that would be taken under the well mitigation plan outside of the E. Bennett Road area. Please see Appendix D to this Final EIR for a revised Well Mitigation Plan, and Master Response 15 - Adequacy of Groundwater Monitoring Wells regarding the applicant's commitment to conduct monitoring of domestic wells within the predicted 1-foot drawdown contour.

Please see Response to Comment Ind 393-3 regarding the San Juan Ridge Mine and Lava Cap Mine.

Response to Comment Ind 393-8

The commenter asks why properties that are annexed into Grass Valley or sold would not receive payment for the cost of water supply. Please see Response to Comment Agcy 10-6.

Response to Comment Ind 393-9

The commenter questions how impacts to wells outside the East Bennett area will be addressed. Please see Mitigation Measures 4.8-2(a) and 4.8-2(b) and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 393-10

The commenter asks why mitigation proposed for previous projects in 2008 and 1996 are different than the mitigation proposed for the project. Please see Master Response 13 - Historic

Hydrogeologic Assessments and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 393-11

Please see Response to Comment Ind 393-3 regarding the San Juan Ridge Mine and Lava Cap Mine.

Response to Comment Ind 393-12

With regard to well monitoring, please see Mitigation Measure 4.8-2(a). Groundwater-level information shall be obtained from the project's groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department. The County typically charges permit holders for inspections and other costs associated with enforcement and monitoring of permit conditions. The same would apply to Rise's project. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, regarding the applicant's commitment to monitor domestic wells within the predicted 1-foot drawdown contour.

Spills would be reported to the Central Valley Regional Water Quality Control board in compliance with regulations of the State of California. See Chapter 4.8 of the DEIR.

Response to Comment Ind 393-13

The County has authority over enforcement of all required mitigation measures and conditions of approval through the Mitigation Monitoring and Reporting Program (Chapter 4 of this Final EIR). To the extent that certain conditions or mitigation measures include self-monitoring, the County has enforcement authority to ensure compliance. The County typically charges permit holders for inspections and other costs associated with enforcement and monitoring of permit conditions. The same would apply to Rise's project.

Response to Comment Ind 393-14

Please see Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 16 - Drought and Climate Change. The groundwater model incorporated historic data and current data to set the proper existing conditions baseline as required by CEQA.

Response to Comment Ind 393-15

To ensure accuracy of the analysis, the County hired an independent expert to review and provide input on the groundwater model, impact analysis and mitigation measures. The independent expert's comments have been incorporated into the analysis and mitigation. Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 393-16

As discussed in Response to Comment Ind 393-15, the County's independent expert, West Yost, peer-reviewed the hydrogeology studies as disclosed in Chapter 4.8 of the DEIR.

Response to Comment Ind 393-17

The water that is being pumped from the underground mine workings is not being disposed of such that it is wasted. Rather, the water will be treated to State permit standards and discharged into South Fork Wolf Creek, where it can be used by NID for water customers in the County or used by other downstream water users. Liability and insurance costs are not within the scope of

CEQA analysis, but these comments have been forwarded to the decision makers for their consideration.

Response to Comment Ind 393-18

Please see Responses to Comments Ind 393-7, Ind 393-7, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 393-19

The commenter asserts that the project is inconsistent with the General Plan and is inconsistent with the Nevada County Energy Action Plan. Please see Master Response 25 - Nevada County Energy Action Plan. General Plan Policy 17.14 requires existing development to be protected from impacts caused by mining. The DEIR provides extensive mitigation measures and conditions of approval to protect already existing development - commercial, residential, and community - as well as undeveloped private lands, from adverse environmental effects caused by mining. Accordingly, the DEIR found that the project is consistent with General Plan Policy 17.14.

General Plan Policy 17.24 requires subsurface mining to be conditionally approved only after environmental review under CEQA is completed to address surface land uses, water quantity and quality, noise and vibration, land subsidence, and traffic associated with surface access. The DEIR provides extensive analysis and mitigation measures regarding the listed impacts on the environment in compliance with CEQA. Accordingly, the DEIR found that the project is consistent with General Plan Policy 17.24.

Response to Comment Ind 393-20

This comment is redundant with comments from Individual Comment Letter 388. See Responses to Comments Ind 388-3 through Ind 388-6.

Response to Comment Ind 393-21

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-7 through Ind 388-9.

Response to Comment Ind 393-22

This comment is similar to comments from Individual Letter 388. Please see Responses to Comments Ind 388-10 through Ind 388-12.

Response to Comment Ind 393-23

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-1 through Ind 388-12.

Response to Comment Ind 393-24

The commenter states that it is likely that more accidents will occur at the two intersections, where project traffic would result in a significant and unavoidable impact, but provides no evidence.

CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

It is also noted that the DEIR includes mitigation for the two impacted intersections. For example, while the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, Mitigation Measure 4.12-1(b) of the DEIR

requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

Regarding the Brunswick Road/Sutton Way intersection, with project traffic, queues in the northbound left turn lanes of the intersection would exceed the threshold of significance. Re-timing of the Brunswick Road/Sutton Way intersection is required by Mitigation Measure 4.12-10 of the DEIR and would maintain LOS C conditions (29.5 seconds per vehicle) with queues declining for this movement. As such, implementation of MM 4.12-10 would reduce the potential impact to a less-than-significant level. However, because the intersection is within the jurisdiction of the City of Grass Valley, Nevada County does not have legal authority to impose this mitigation measure and ensure its eventual outcome. As a result, the impact is conservatively determined to be significant and unavoidable.

Response to Comment Ind 393-25

Please see Response to Comment Ind 393-24 regarding traffic accidents.

Water quality and water supply are analyzed in Chapter 4.8 of the DEIR.

With regard to economic issues and property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

With regard to air quality, please see Chapter 4.3 of the DEIR and Master Response 18 - Air Quality Thresholds.

With regard to "toxic spills" see Chapters 4.7 and 4.8 of the DEIR. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

While many of the project-related concerns noted by the commenter were not identified as significant and unavoidable in the DEIR, it is noted that under CEQA Guidelines Section 15043, the County maintains the authority to approve projects despite significant and unavoidable environmental effects under certain circumstances. Should the Nevada County Board of Supervisors seek to move forward with certifying this EIR and approving the project entitlements, due to the significant and unavoidable impacts that would occur with implementation of the project, the Board would be required to adopt a Statement of Overriding Considerations. The Statement of Overriding Considerations would publicly disclose the process by which the Board weighs the environmental impacts of the project against any other factors. As enumerated in Section 15093 of the CEQA Guidelines, factors to be balanced by the Board when considering projects that would result in a significant and unavoidable environmental impact include economic, legal, social, and technological benefits of projects as well as region-wide or statewide environmental benefits.

Response to Comment Ind 393-26

Analysis of significant irreversible environmental changes is a distinct topic of analysis mandated by CEQA Guidelines, Section 15126.2, which is distinct from CEQA's requirement to assess potentially significant impacts in individual resource areas (e.g., noise, traffic, air quality).

Response to Comment Ind 393-27

Any project that consumes non-renewable energy or mines non-renewable resources would be considered to cause significant irreversible environmental changes. The commenter's suggestion that any project with significant irreversible environmental changes is inconsistent with the General Plan is untenable and would result in the rejection of virtually every project. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations, as discussed in Response to Comment Ind 393-25.

Response to Comment Ind 393-28

Please see Master Response 27 - Greenhouse Gas Thresholds, and Master Response 28 - Greenhouse Gas Credits.

Response to Comment Ind 393-29

Please see Master Response 27 - Greenhouse Gas Thresholds, Master Response 18 - Air Quality Thresholds, and Master Response 166 – Drought and Climate Change.

Response to Comment Ind 393-30

Climate change is a global issue and not only a project specific issue. The project's incremental contribution of GHG emissions would be less than cumulatively considerable (see page 4.3-95 of the DEIR).

Response to Comment Ind 393-31

The County determined that 10,000 MT/year of CO_2 equivalent GHG emissions is the proper CEQA threshold to apply to the project. Please see Master Response 27 - Greenhouse Gas Thresholds. Greenhouse gas emissions are not included in health risk assessments, as they are not considered toxic air contaminants. Please see Chapter 4.3 of the DEIR.

Response to Comment Ind 393-32

Please see Master Response 27 - Greenhouse Gas Thresholds. The project is not required to achieve net zero GHG emissions.

Response to Comment Ind 393-33

Please see Chapter 4.3 of the DEIR, Master Response 18 - Air Quality Thresholds, and Master Response 27 - Greenhouse Gas Thresholds. The project is not required to monitor or publish emissions of GHG. GHG emissions during fire season would not cause a direct air quality impact as GHG emissions are not toxic air contaminants or criteria air pollutants. Climate change is a global impact and not specific to the individual communities listed by the commenter, thus individual analysis of those communities is not required by CEQA.

Response to Comment Ind 393-34

Air quality impacts from the project are less than significant after mitigation. Please see Chapter 4.3 of the DEIR. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations.

Response to Comment Ind 393-35

GHG emissions attributable to trucks has been analyzed in the DEIR. Please see Chapter 4.3 of the DEIR. Please also see Response to Comment 393-24 regarding significant traffic impacts.

The commenter notes that the DEIR identifies Alternative 2, Elimination of the Centennial Industrial Site, as the environmentally superior alternative, but said alternative still has significant and unavoidable issues for transportation. What the commenter does not mention is that Alternative 2 would eliminate one significant project-related noise impact (DEIR, p. 6-28). This is the impact related to potential use of Jake brakes along the haul route connecting the Brunswick and Centennial Industrial Sites. The EIR determined that the proposed project could result in a substantial increase in ambient noise levels in the vicinity of the project due to haul truck traffic should Jake brakes be used. As also noted on page 6-29, implementation of Alternative 2 would also eliminate the truck turning movements along Whispering Pines Lane into the Centennial Industrial Site driveway; thus, widening along the Centennial Industrial Site's frontage for purposes of facilitating adequate truck turn movements into and out of the Site would not be required for this Alternative. Alternative 2 would also eliminate certain project-related pavement impacts along the haul route from the Brunswick to Centennial Sites.

As discussed on page 6-2 of the DEIR, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]). Alternative 2 would avoid some of the proposed project's impacts, and therefore, meets the CEQA requirement for an alternative.

Response to Comment Ind 393-36

Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 393-37

The commenter states that it is likely that more accidents will occur at intersections due to project traffic but provides no evidence for this argument.

CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Please also see Response to Comment Ind 393-24.

Liability insurance is not an environmental issue requiring analysis under CEQA.

Response to Comment Ind 393-38

Please see Response to Comment Ind 393-37.

Response to Comment 161-39

Please see Responses to Comments Ind 393-19 and Ind 393-25.

Response to Comment Ind 393-40

Please see Master Response 3 - Operator Responsibility. Please see Response to Comment Ind 393-19 regarding General Plan Policy consistency.

Response to Comment Ind 393-41

Please see Master Response 3 - Operator Responsibility, and Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 393-42

Documents used directly in an EIR's impact analysis are typically included in the appendices (e.g., technical studies performed specifically for the project). However, outside documents that only indirectly relate to the project are sometimes incorporated by reference into an EIR to avoid inflating the length of the EIR and its appendices to an unmanageable size. Citations are provided for referenced documents, so that readers can locate those documents if desired.

Response to Comment Ind 393-43

Please see Response to Comment Ind 393-19 regarding General Plan Policy consistency. General Plan consistency was analyzed in the DEIR, which concluded that the project is generally consistent with the General Plan. If the project is approved by the County, the reasons for approval will be outlined in the CEQA findings and the Statement of Overriding Considerations, as discussed in Response to Comment Ind 393-25.

Response to Comment Ind 393-44

Please see Response to Comment Ind 393-43.

Response to Comment Ind 393-45

Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 393-46

The comment does not address the adequacy of the DEIR. Comment noted.

Response to Comment Ind 393-47

This comment is redundant with comments from Individual Letter 388. Please see Responses to Comments Ind 388-1 through Ind 388-12.

Individual Letter 394

RECEIVED

MAR 0 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 3

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 02/28/2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock:

My name is John Vaughan. I have been a resident of Nevada County since 1967 (55 years). My wife Gail and I live on Lower Colfax Road, approximately 100 yards from the southwest edge of the Rise Gold mineral rights area. Our property is served by a well. We are District III voters.

We do not support the Rise Gold project due to the huge negative impacts on our people, water supplies and property values and urge you to vote NO on the project.

I'd like to highlight one of my many areas of concern with the Draft Environmental Impact Report (DEIR), specifically the lack of inclusion and detailed review of the Nevada County Business and Industrial Center[1] (NCBIC) alternative, which with existing M1-SP zoning could include a 54,000 ft^2 Business Park, 242,000 ft^2 for Service Business/Light Manufacturing and 238,000 ft^2 for Industrial uses[2].

Ind 394-1

I am currently retired but the last 20 years of my career were spent at PRIDE Industries in Roseville. The last 10 of those I was the Senior Vice President of Manufacturing and Logistics, including responsibility for a large distribution contract for Hewlett Packard. We operated a shipping/receiving/distribution warehouse shipping millions of printer parts/year all over the world. Our facility was just over 200,000 square feet with 12 loading docks about 10 minutes from Interstate 80. The in/out diesel truck traffic was 10-15 trucks/day between 6am-6pm. In short, I know a bit about distribution and logistics.

The DEIR Chapter 6 "Alternatives Considered but Dismissed from Further Analysis"[3] is incorrect and incomplete. Specifically, in the "No Project" section, the analysis of the currently permitted NCBIC alternative[4] contains incomplete information and notes examples of negative impacts that are extremely unlikely to occur in the real world. The DEIR concludes an overall negative impact of these uses and rejects this alternative without adequate review.

In the summary section for the NCBIC alternative[5], the DEIR rejects this option assuming noise, traffic, aesthetics and air quality would be the same or worse for the NBCIC alternative vs. the Rise Gold mine. In virtually all cases for the types of businesses, using existing zoning, that would actually locate there, the traffic and noise would be daytime, mostly weekdays, not 24x7, comprised largely of passenger cars and small trucks with large truck traffic substantially less than the 236 trips/day for the Rise Gold project[6] and almost none of the traffic hauling toxic waste.

The DEIR identifies (among others) Distribution Facilities and Auto Dismantling Yards as examples of business that would "...cause substantial noise, traffic, aesthetic and air quality impacts..." While these business types are permitted under existing zoning, the likelihood of such ventures at this location is extremely low. Both Distribution Facilities and Auto Dismantling Yards (and Saw Mills and Planing Mills)

[1] DEIR page 6-11, Nevada County Ordinance 1853, February 1994
[2] DEIR page 6-11/12
[3] DEIR page 6-8
[4] Beginning at the bottom of Page 6-11
[5] Bottom of Page 6-13, last 2 paragraphs before "Reduced Hours"
[6] 118 round trips, see Table 4.12-8, page 4.12-34

require easy access to major freeways like Interstate 80 and therefore are not realistic for this site. In the case of large 24x7 Distribution Facilities, anything further than 10-15 minutes from a major freeway is not feasible and 238,000 square feet (238K) is too small.[7] Even if you attracted a Distribution Facility tenant, 238K would not support enough loading docks to create the same large truck traffic as the Rise Gold Mine project. Additionally, for Distribution Facilities and other permitted businesses, at the scale available at this site, the semi-truck traffic would be limited to weekday or daytime use as small to mid-size facilities are unlikely to operate 24x7. The DEIR also notes that a Milling and Planing Facility "would potentially create noise similar or greater to the proposed project." Frankly, that's hard to believe as there was a saw mill and planing mill at that site for decades.[8]

Re air quality: The impact on air quality would be greatly reduced with tenants that reflect what would happen in the real world at the NCBIC vs. the unrealistic scenarios in the DEIR.

Re traffic: The DEIR suggests that car and truck traffic to/from the NCBIC would generate the same pollution as the projected traffic to/from the proposed mine, which includes 236 semi-truck trips/day. Each diesel semi-truck emits as much pollution as 150 cars[9]. Considering only the diesel semi-trucks, producing the same emissions as 236 trips/day requires 35,400 trips/day from cars and light trucks, an unlikely scenario for the mix of businesses that might actually occupy the NCBIC.

Re aesthetics: Given the site is already zoned for the buildings and businesses noted, aesthetic issues could be easily mitigated and included in a proposal for development of all or part of the NCBIC.

Virtually all of the businesses listed in "Examples of Permitted Uses"[10] already exist or have existed in Nevada County without hundreds of local residents protesting about potential traffic, noise, water consumption, water usage or pollution. It seems like a reasonable model to follow to do more of what we already know how to do without changing the nature of our community for the next 80 years. I believe many of the people who oppose this mine would likely support a "No Project" alternative with the NCBIC as the best outcome.

Assigning a "not feasible" label to the NCBIC alternative using unrealistic assumptions makes it appear as if the DEIR authors have not done their homework. I'm not saying that the NCBIC should be built now (or ever), that's not my decision, but to reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Rise Golds advertising "postcard" claims the "Science is Clear". That's debatable given that much of their science is based on assumptions and forecasts. The same postcard claims are there are "no significant impacts" while the DEIR clearly states there are "Significant and Unavoidable" impacts.

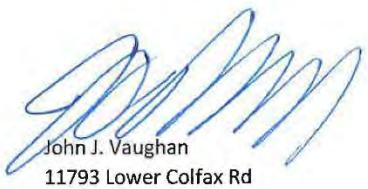
What is clear is this is the wrong project for Nevada County.

I urge you to vote NO on this project.

Thank you.

---

[7] While PRIDE's facility was considered too small we were awarded the HP contract, and kept it for years, because of HP's commitment to PRIDE's mission to create jobs for people with disabilities.
[8] There is already a custom milling operation at 11429 East Bennett Rd - Freds Custom Milling and Lumber
[9] www.cleanairtrust.org/trucks.dirtytruth.html
[10] DEIR pages 6-12/13



John J. Vaughan
11793 Lower Colfax Rd
Grass Valley, CA 95945
District III Voter
916-807-0430 Cell
jvaughan1946@gmail.com

CC: Matt Kelley, Senior Planner

INDIVIDUAL LETTER 394: JOHN VAUGHAN

Response to Comment Ind 394-1

This letter is a duplicate copy of Individual Letter 388. Please see comments and responses in Individual Letter 388.

Individual Letter 395

Dist 1

RECEIVED

MAR 21 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 03/09/2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

Ind 395-1 Volz Brothers is a family owned company that has been in business in Nevada County since 1982. We are located less than ½ mile from the Centennial Site where much of the post excavation fill dirt will be deposited. Our business, including our customers and employees will be negatively impacted by the more than 200 diesel truck trips between the mine and the Centennial Site.

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I urge you to vote NO on the project.

Rise Gold fails to adequately mitigate many significant negative impacts of this large industrial project on our community and business.

Ind 395-2 My business and personal opposition to this project is based on published Rise Gold plans, reports and the DEIR (Draft Environmental Impact Report). Reports from experts show there will be significant increases in air pollution, traffic in key areas (including on Idaho Maryland Rd, very near the Volz Brothers location), noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources and more. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs, approximately 220 from local hiring, to the County workforce of approximately 44,000 is trivial no matter what the wages, and the higher paying jobs are unlikely to go to County residents.

Ind 395-3 Sincerely,

John Volz
Volz Bros. Automotive
962 Golden Gate Terrace, Grass Valley
530-273-3979

Cc: Nevada County Planning Commission (Suite 170)

INDIVIDUAL LETTER 395: JOHN VOLZ

Response to Comment Ind 395-1

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 395-2

In addition, please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 395-3

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 396

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 03/09/2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

Ind 396-1 Volz Brothers is a family owned company that has been in business in Nevada County since 1982. We are located less than ½ mile from the Centennial Site where much of the post excavation fill dirt will be deposited. Our business, including our customers and employees will be negatively impacted by the more than 200 diesel truck trips between the mine and the Centennial Site.

I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I urge you to vote NO on the project.

Rise Gold fails to adequately mitigate many significant negative impacts of this large industrial project on our community and business.

Ind 396-2 My business and personal opposition to this project is based on published Rise Gold plans, reports and the DEIR (Draft Environmental Impact Report). Reports from experts show there will be significant increases in air pollution, traffic in key areas (including on Idaho Maryland Rd, very near the Volz Brothers location), noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources and more. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs, approximately 220 from local hiring, to the

Ind 396-3 County workforce of approximately 44,000 is trivial no matter what the wages, and the higher paying jobs are unlikely to go to County residents.

Sincerely,

John Volz
Volz Bros. Automotive
962 Golden Gate Terrace, Grass Valley
530-273-3979

RECEIVED
MAR 22 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Cc: Nevada County Planning Commission (Suite 170)

INDIVIDUAL LETTER 396: JOHN VOLZ

Response to Comment Ind 396-1
Please see Response to Comment Ind 395-1.

Response to Comment Ind 396-2
Please see Response to Comment Ind 395-2.

Response to Comment Ind 396-3
Please see Response to Comment Ind 395-3.

Individual Letter 397

Dist 1

RECEIVED

FEB 22 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Ind 397-1

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a father I urge you to think about what world we want for out next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Jon Benner

INDIVIDUAL LETTER 397: JON BENNER

Response to Comment Ind 397-1

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 398

From: Jonas Ketterle <jonas.ketterle@gmail.com>
Sent: Monday, April 4, 2022 3:45 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR Comment Submission - Concerned About Dewatering Impact on Water Quality

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Board of Supervisors,

Thank you for considering my comment. I am a 36 year old home owner in Grass Valley, and intend to raise my family in the area. My property is on the South Fork of Wolf Creek, and I am very concerned about the water quality impacts of the proposed mine. Our property is adjacent to a historic lumber damn, that is now largely sedimented and has created extensive marshland behind it. The wildlife I've observed from our home in Wolf Creek includes top of the food chain species like otter, beaver, heron, osprey, as well as many other species of waterfowl, fish, and amphibians. I'm VERY concerned that the dewatering that is necessary for mine re-opening will adversely affect this complex ecosystem, especially in a time that ecosystems in California are already under incredible duress due to climate change. Furthermore, my house's water supply comes from a shallow well that is on the banks of the South Fork of Wolf Creek, and I am concerned that the mine dewatering will have an impact on my household's water quality. The lack of sufficient analysis in the DEIR of impact on the water quality of South Fork Wolf Creek has me very concerned that the well for my house will no longer be suitable for domestic use.

Ind 398-1

The DEIR fails to adequately address biological and aquatic resources and hydrological impacts to those resources. The DEIR's biological surveys exclude an entire reach of South Fork Wolf Creek (SFWC) which is where my home is located. Species of special concern are inadequately considered and qualitative data for benthic macro- invertebrates (BMI) is missing. (Wolf Creek Community Alliance (WCCA), Benthic Macroinvertebrate Analysis, 2007) Aquatic resources are excluded through an inaccurate hydrological assessment of the full length of SFWC ignoring the connectivity of the creek upstream and downstream of the culvert on the Mine property thus failing to consider the movement of trout and other aquatic species.

Ind 398-2

1

Ind 398-3

Hydrological impacts due to mine dewatering into SFWC are inadequately studied mischaracterized or not considered. The initial dewatering rate of 2500 gallons per minute (gpm) would be followed by 80 years of subsequent operational dewatering at 850 gpm and as much as 2500 gpm. The DEIR fails to adequately consider this long-term higher rate of discharge. Nor does the DEIR consider the seasonality of stream flow loss of streambed or streambank habitat changes in temperature differences in Specific Conductance (EC) and habitat for BMI. Drawdown of the water table due to dewatering is also underestimated and its impacts to meadow wetland and forest habitats are not considered. Further the DEIR fails to consider chronic and cumulative impacts to BMI trout and other aquatic species including special concern amphibians. (WCCA) Overall because the DEIR does not adequately address biological and aquatic resources or sufficiently analyze hydrological impacts this document must be revised.

Ind 398-4

Again, thank you for your consideration of my comment. I've focused my comment submission on this particular aspect of the DEIR, but there are many other aspects of the mine proposal that have me very concerned. Please diligently consider all the other comments received from our community as to whether or not this mine will truly be beneficial for our town and bio-region.

Kindly,
Jonas



INDIVIDUAL LETTER 398: JONAS KETTERLE

Response to Comment Ind 398-1

The commenter resides near South Fork Wolf Creek and is concerned with impacts from the discharge of treated water to South Fork Wolf Creek and any adverse impacts to the private well that serves the property. The DEIR discusses the impacts to South Fork Wolf Creek in Chapter 4.8 and found that impacts would be less than significant after mitigation, both with regard to water quality standards (DEIR, p. 4.8-41) and groundwater supplies (DEIR, p. 4.8-54.) For other impacts related to South Fork Wolf Creek, the commenter is referred to Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, Master Response 30 - Biological Study Technical Adequacy, Master Response 34 - Resident Fish, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 398-2

The commenter states that the DEIR is inadequate because it does not include a biological survey of the entire reach of South Fork Wolf Creek and does not discuss biological, aquatic, or hydrological impacts to South Fork Wolf Creek. The offsite stream reach referenced by the commenter is outside the project site and will not be subject to project-related surface disturbance. However, potential downstream effects of the project were evaluated in the DEIR. Please see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 34 - Resident Fish, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependant Vegetation, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog. The commenter is also referred to Response to Comment Grp 31-12 regarding BMI.

Response to Comment Ind 398-3

The commenter reiterates concerns with hydrological and biological impacts to South Fork Wolf Creek. The commenter also states that the DEIR inadequately discusses the variable rate of flow from the dewatering of the Idaho-Maryland Mine. The commenter is referred to Response to Comment Ind 398-1. Regarding the rate of flow, the analysis of project impacts considers the higher rate of flow of 2,500 gallons per minute. The commenter is referred to Chapter 4.8, Appendices K.1, K.2, and K.3 of the DEIR. Regarding the Specific Conductance and BMI, the commenter is referred to Response to Comment Grp 31-12.

Response to Comment Ind 398-4

The commenter is concerned about various other aspects of the DEIR but provides no specific comments on the adequacy of the DEIR. The comment is noted and has been forwarded to the decisionmakers.

Individual Letter 399

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

JBK Comment to Planning Commission 3/24/2022

Good morning Commissioners; thank you for this opportunity.

My name is Jonathan Keehn. My wife and I live in District 3, just outside the GV city limits, and also own two other properties in GV proper. I also own a house in District 4, near North Columbia. Our place there is on property adjacent to the now-defunct Siskon Gold Mine. (more?)

I've lived and worked in Nevada County since 1970. I am licensed General Contractor, and owner of Keehn Construction, in business for close to 50 years. In 2003 I was one of the founders of the Wolf Creek Community Alliance, and currently serve as President. The mission of our organization includes "to preserve, protect, and restore Wolf Creek and its watershed."

In getting ready to address you this morning, I looked at the Staff Report you have before you. On page 2, about ⅔ of the way down, a sentence jumped out at me. "A new above ground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek." This is an important pipe for the proposed project, as I'm sure you are aware. But it is not the pipe I want to bring to your attention - it's the wording : "existing dirt road". It is not a road, it's a path.

Ind 399-1

I know this area pretty well - our organization has monitoring sites just upstream and downstream. For years before RISE bought the property and put up No Trespassing signs, lots of neighbors and creek lovers enjoyed walking and bird-watching on the informal trails. There are a ton of native California plants: trillium, equisetum, and surprising orchid called rattlesnake plantain. Maps in the DEIR show a dotted line for the proposed pipeline, but there is no "existing dirt road" there. It is a meandering path; it may have been used for logging 50 years ago, but not a road. One has to step over fallen trees, dodge poison oak, and jump over streams in the rainy season.

At least that's the way it was last time I was there 3 or 4 years ago. I don't know if the applicant has recently built a road there - I'd have to check with the planning department to see if permits exist.

So why does the DEIR (and your staff report) call it an "existing dirt road"? Whoever wrote those words apparently wanted it to sound like "no big deal, this area is already degraded, just fine for a pipeline". It may be a small detail, but it is indicative of many passages in the DEIR that minimize or ignore the existing habitats, to say, "we're only going to make it a little bit worse".

My comment this morning: "the DEIR must be revised to accurately describe the proposed pipeline route as it really is; not "an existing dirt road", but a lovely path along the creek."

Thank you for your time.

INDIVIDUAL LETTER 399: JONATHAN KEEHN

Response to Comment Ind 399-1

The commenter questions whether the pathway for the new above ground pipe that would convey treated water from the treatment plant to its discharge point at South Fork Wolf Creek is accurately characterized as "an existing dirt road." The commenter incorrectly states this is a "path along the creek" and it should be noted this is private property and not a public path or trail. Irrespective of the terminology used to characterize this area of the site, the DEIR analyzed potential impacts associated with disturbance related to installation of the treated water pipeline along this pathway. DEIR section 4.4.4 analyzed potential biological impacts associated with project-related surface disturbance, including installation of the aboveground pipe. Mitigation measures require preconstruction surveys prior to surface disturbance to limit potential impacts to rare plants, special status wildlife species, and protected birds and raptors (see Mitigation Measures 4.4-1(b) and 4.4-2(a-g.)

Individual Letter 400

3/24/2022

Nevada County Planning Department
950 Maidu Avenue, Nevada City,
CA 95959



225 south auburn street
Grass Valley, CA
95945

Dear Matt Kelley,

Ind 400-1

We should not reopen the Idaho Maryland mine and here is why. Did you know the metal mining industry reported 2.8 billion pounds of toxins admitted to our air, water, and wildlife, now let that sink in?" In 2012, 340 migrating geese were found dead in the abandoned Berkeley pit copper mine in Butte Montana. "Fish in a 15 mile stretch of the Alamosa river were found dead in Colorado and were killed by a spillage in Summitville mine, near Leadville." Did you know Some of the most acidic water ever recorded in the Richmond Mine in California? The water was more acidic than battery acid and was known to catch on fire. I believe we should not reopen the Idaho Maryland mine because it is bad for our air, water, and wildlife. (WMAN)

Ind 400-2

Imagine how bad our air quality is during the fire season with all of the smoke, now imagine how much worse it would be with the mine, people would not be able to live here. "Hundreds of tons of rock are unearthed, moved, and crushed in mining operations significantly increasing the amount of dust and particulates in the air." In addition, mine tailings, which may contain finely ground and even toxic waste, can become airborne." This air pollution can directly affect human health. Tailing from uranium mines on Navajo Reservations lands in Arizona has contributed to health problems experienced by local residents. "In a 1998 case study, EPA documented dozens of toxic releases from mines and processing facilities in Arizona, New Mexico, and Nevada. Eight out of 12 major mines in Montana have major water quality problems that were not predicted by federal agencies at the time of permitting."

Ind 400-3

You need water to survive right? So how would you feel if one of the things you needed to survive was contaminated, well I know that I wouldn't like that? More than 40% of stream reaches in western watersheds are contaminated by acid mine drainage and heavy metals now that is a lot. In Nevada, the driest state in the U.S, the Humboldt River is being drained to benefit gold mining operations along with the Carlin Trend, all of this just for gold. Mines in the northeastern Nevada desert have pumped out more than 580 billion gallons of water since 1986—enough to feed New York City's taps for over a year. Hundreds of migratory birds have been poisoned after landing at mine pit lakes in California and Nevada, according to the WMAN Eviremental impactite of mines. Acid mine drainage can be 20 to 300 times more acidic than acid rain and can burn human skin and kill fish and aquatic organisms. An EPA inspection

between 1990 and 1995 of some U.S. mines and processing facilities found that about 20 percent were polluting air or water in violation of federal environmental laws, according to the WMAN Eviremental impactite of mines.

The death rate from the serious disease has been very high in the Clark Fork Basin near Butte, Montana, and areas of intensive mining and smelting for over a hundred years. "The Clark Fork Basin contains the most extensive area of Superfund sites in the United States." National cancer statistics also have shown elevated death rates from cancer—particularly lung, bronchial, and trachea cancer—in areas of the Clark Fork Basin where mining has occurred. And losing many people do to cancer I don't want more people to lose people do to it. "Cancer mortality rates in these areas have been much higher than in other areas in Montana and neighboring states where mining activity has not occurred. Spills and drainage for the defunct Richmond Mine have killed fish and plants along miles of the Sacramento River, which provides drinking water for 80,000 residents of Redding, California. We need these things to survive so why are we just getting rid of them. Mining also can cause erosion and sedimentation, burying gravel beds important for salmon spawning and damaging habitat for trout and other species that depend on clear, cold, oxygen-rich water for example that is like taking away all of are clear water and replacing it with dirty water, oh wait that exactly what they are doing."

Ind 400-4

Sincerely,
Jonathan Nolan
Jonathan Nolan

INDIVIDUAL LETTER 400: JONATHAN NOLAN

Response to Comment Ind 400-1

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 400-2

Please see Master Responses 18 through 23 regarding air quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 400-3

Please see Master Responses 30, and 33 through 35 regarding water quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 400-4

Please see Master Responses 34 and 35, as well as Response to Comment Ind 400-3. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 401

February 18, 2022

Dear Nevada County Board of Supervisors:

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

Ind 401-1 As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 401-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 401-3 INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 401-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Ind 401-5 Sincerely,

Jorge Velasquez,
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 401: JORGE VELASQUEZ

Response to Comment Ind 401-1
Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 401-2
Please see Master Responses 8 through 12 regarding mine waste and Master Response 35 regarding water quality in South Fork Wolf Creek. In addition, the DEIR evaluates the proposed project's potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, including as part of construction and mine dewatering, under Impact 4.8-1, starting on page 4.8-41. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 401-3
Please see Master Responses 18 through 23 regarding air quality and Master Responses 25 through 28 on greenhouse gases and climate change, as well as the discussions and analyses in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 401-4
The commenter reiterates the significant and unavoidable conclusion in the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Response to Comment Ind 401-5
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 402

February 15, 2022

Dear Nevada County Board of Supervisors,

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company

Ind 402-1 As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned aboul the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 402-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 402-3 INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 402-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Ind 402-5 Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Sincerely,

Jorge Velasquez
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

INDIVIDUAL LETTER 402: JORGE VELASQUEZ

Response to Comment Ind 402-1
Please see Response to Comment Ind 401-1.

Response to Comment Ind 402-2
Please see Response to Comment Ind 401-2.

Response to Comment Ind 402-3
Please see Response to Comment Ind 401-3.

Response to Comment Ind 402-4
Please see Response to Comment Ind 401-4.

Response to Comment Ind 402-5
Please see Response to Comment Ind 401-5.

Individual Letter 403

February 14, 2022

Attention: Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902

Ind 403-1 Thank you for this opportunity to review and comment on the, *Idaho-MaryLand Mine Project SCH # 2020070378 Draft Environmental Impact Report December 2021 Prepared By: Raney Planning & Management, INC. for the proposed Idaho-Maryland Mine.*

Having reviewed the proposed project's Draft EIR I agree with, Alternative 1: No Project (No Build) Alternative (Section 2.4 Summary of Project Alternatives).

My main concern for such a project is potential adverse effects to groundwater within the Wolf Creek watershed. I own property within the Greenhorn Creek watershed and rely on a groundwater well. Having lived most of my life using well water, I understand the need for conserving your groundwater, especially in years of drought.

Ind 403-2 I have other concerns, though my agreement is with Alternative 1.

2/14/2022

Joseph D. Riley
Nevada County Resident

RECEIVED
FEB 18 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 403: JOSEPH RILEY

Response to Comment Ind 403-1

The comment notes preference for Alternative 1 – No Project (No Build). The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 403-2

Please see Master Responses 13 through 16. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 404

From: Joshua Fisher <joshua@thefuturegods.com>
Sent: Monday, April 4, 2022 3:17 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Comments on the Draft EIR for the Idaho-Maryland Mine Project

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Hello Matt,

I wanted to voice my concerns about the possibility of the mine reopening.

I am a newer resident of Nevada City, my girlfriend and I moved up here from Los Angeles in September, mainly to be surrounded by the nature, cleaner air & water and just a slower pace of life. We love to so far!

Ind 404-1

I am not going to pretend to be an expert on mines because I am not. I am political junky and know a good deal about history and with that comes the some knowledge of mines and the harm they can bring to their surrounding environments. With that said, I like to read and I have looked into a lot of the consultant letters and reports and I think this mine project has the ability to harm many of the reasons we intended to move up here in the first place — This is coming from a new resident. We have some neighbors who have been here for generations and they concerns carry more weight.

Some of the issues I have are

Ind 404-2

- Mine waste — a lot of the experts say Asbestos will be. Huge problem and there would need to be a way larger effort than described in the report. There is no denying there will be Asbestos, so in my opinion, why even mess with something so toxic.

Ind 404-3

- I'm worried about all the toxins that can get into our drinking water

Ind 404-4

- Noise, traffic, air quality — All the reasons I moved to a place like Nevada City and all the things this projects would bring.

These are just a few of the many concerns I have and have been raised by the community. I hope you take it all into consideration. I know there is a lot of money behind the project, but the people of this community don't want this project moving forward!

Ind 404-5

Joshua
—
Future Gods
www.thefuturegods.com

1

INDIVIDUAL LETTER 404: JOSHUA FISHER

Response to Comment Ind 404-1

The comment alludes to concerns expressed in subsequent comments. Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 404-2

Please see Master Responses 8 through 10 regarding mine waste and Master Responses 22 and 23 regarding asbestos. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 404-3

Please see Master Response 35. In addition, the DEIR evaluates the proposed project's potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, including as part of construction and mine dewatering, under Impact 4.8-1, starting on page 4.8-41. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 404-4

Please see Master Response 1. The commenter expresses general concerns regarding noise, traffic, and air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 404-5

Please see Master Response 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 405

Dist 1

Ind 405-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Don't sell out our community!!

Address

Phone

Email Address

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ms. Joy Waite
12504 Old Stagecoach Rd
Grass Valley, CA 95945-9606

RECE
FEB 1
NEVADA
BOARD OF SU

RISE GRASS VALLEY

Liar Liar Pants on Fire

RECEIVED
FEB 18 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

Don't give them a permit!

INDIVIDUAL LETTER 405: JOY WAITE

Response to Comment Ind 405-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 406

Matt Kelly
Senior Planner
Nevada County

Comments on the Rise Gold DEIR

I am concentrating on water concerns although there are many other of the at least 83 "issues that cannot be mitigated" that concern me.

Concerns about water fall into several categories:

Ind 406-1 Water follows the path of least resistance. The miles of mine shafts holding incalculable volumes of water has a (DEIR) reported static level at 260 feet below the surface. This volume of water is significant as an underground reservoir. Pumping this water out creates an open space that serves as a path of least resistance. Rise Gold is proposing that the mine would continue to be pumped out for 80 years. Even if we had no concerns about drought, knowing that water was being pumped out of Nevada County at 2500 gallons per minute per the DEIR flies in the face of residents already being periodically asked to reduce water use.

Ind 406-2 Related to the above is the water security of neighboring home owners. The DEIR admits the relationship between emptying the mine of water and the failure of local wells. The area the DEIR suggests that NID provide a water supply to is minimal (30 homes along East Bennett St). Well failure could be much more widespread (some suggesting 595 or more wells) When Emgold took us through this process (hasn't our community gone through this same process enough times???), residents as far away as Banner Mountain expressed concern about the viability of their wells. The precautionary principle would put the **onus on Rise Gold** to prove that the evacuation of water from the mine did not cause these failures.

Ind 406-3 The DEIR claims that the water in the mine is clean and qualifies for a "Limited Threat permit". High levels of iron and manganese are the only issues noted. The description of a 40 acre foot settling pond and water treatment plant are very sketchy and lack details. The minimal information provided leaves more questions than answers. This shows that very little effort and thought has been put into this important issue. All we read about the water treatment plant is that there will be one. Nothing about the design or how it would function is specified. Design and specifications for a water treatment plant must be part of the DEIR. At 2500 gallons per minute, 11.05 acre feet of water would be pumped out per day. A 40 acre foot settling pond would reach capacity in less than 4 days. That volume of water negates its use as a settling pond.

Ind 406-4 The DEIR includes a section on Stormwater detention ponds. There is no plan mentioned for treating the water in these detention ponds despite the volumes of tailings that will be produced and stored on the surface. What about the quality of water being pumped out of the mine after tailings are used underground for "backfill? In addition to water security, our local geology of fractured rock makes the path of water largely a guessing game, how about probable contamination of wells due to mining activity?

Ind 406-5 The DEIR indicates that an on site septic field system would contain waste water from toilets, sinks, showers, etc. Again, water follows the path of least resistance. How will this water be

kept out of the mine? Specifications on proposed septic systems need to be included in the DEIR.

Ind 406-6

NID is being asked to provide 5700 gallons per day of potable water, and an undetermined amount of water for myriad other uses such as dust control. One number offered is 42,000 gallons per day from NID. The DEIR admits squandering a current water supply (de watering) and then also sucking up a significant amount of already limited local water.

Ind 406-7

Our community's water security is of utmost importance and cannot be compromised by dirty extractive industrial operations. History has proven that the wealth of communities has been taken and a mess left behind. The term coined is "toxic mining legacy" here in Nevada County. **We can't afford one day of mine reopening** let alone 80 years and the DEIR suggests further industrial uses after that. Reclamation according to the DEIR is seeding the surface tailings. There is no requirement that the seeds be able to grow. The mine closed in the 1950's and the site is still contaminated. Those who do not learn from history end up repeating it. Haven't neighbor complaints since Rise Gold has been doing "exploration" been proof enough of the devastation that would be wrought by full mining operations?? Please don't open the door to this destructive exploitation of our beautiful community. How easily the incredible arts and culture so cultivated and prized here, and the lovely foothills environment we love could be wrecked..,

Joy Waite
Grass Valley

INDIVIDUAL LETTER 406: JOY WAITE

Response to Comment Ind 406-1

The DEIR estimates that there is approximately 1,183 acre-feet of water in the underground mine workings. (DEIR, p. 4.8-12.) The DEIR concludes that the dewatering of the mine would result in less than significant impacts after mitigation to groundwater supplies. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 406-2

The commenter states that the DEIR underestimates the number of private wells potentially impacted by the project, but does not explain how the DEIR is inadequate in this regard. The DEIR concludes that the dewatering of the mine would result in a less than significant impact after mitigation to groundwater supplies. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 406-3

The commenter states that the DEIR lacks adequate detail with regard to the settling pond and on-site water treatment plant and that the mine contains contaminants. A sufficient description of the proposed water treatment plant is included in Chapter 4.8, Hydrology and Water Quality, of the DEIR (DEIR, pg. 4.8-43). A detailed description of the water treatment plant is provided in Appendix K.4 of the DEIR (Water Treatment Plant Design Report). The mine water discharge is required to meet water quality goals including total suspended solids. The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 406-4

One of the commenter's primary concerns appears to be with the potential for stormwater quality to be impacted by above-ground tailings. The applicant will need to obtain several approvals from the Central Valley Regional Water Quality Control Board (RWQCB), which will require further testing of the rock at the project site. As described in the April 4, 2022 comment letter from the RWQCB (Agency Letter 5 of this Final EIR), additional laboratory studies will be required to characterize the waste materials as part of a Report of Waste Discharge. The RWQCB cannot issue permits for the placement of engineered fill unless the testing that is part of the Report of Waste Discharge clearly demonstrates that use of the barren rock for engineered fill will not violate water quality standards or conflict with the Water Quality Control Plan. The barren rock testing that was conducted in support of the project application and used in the DEIR provides evidence of the potential water quality effects that might occur due to the use barren rock as engineered fill, while the RWQCB permits, which are a requirement of the project because mining cannot occur until such permits are issued, ensure that water quality standards will be met. Please see Master Response 8 – Mine Waste Characterization.

Another primary concern of the commenter appears to be the potential for backfill placed in the mine to contaminate groundwater being pumped from the mine. Regarding cement paste backfill, the DEIR imposes mitigation measures that require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d). The CVRWQCB requires additional waste characterization as part of approving WDRs and also requires ongoing water quality monitoring during the implementation of WDRs to ensure that no water quality impacts will occur.

In regard to fractured rock, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Ind 406-5

The commenter asks how water from the on-site septic system would be contained and states that the DEIR lacks this information. Water from the leach field proposed for the project does not drain into the underground mine. Appendix H.8 of the DEIR provides a septic system analysis. As stated on page 4.11-34 of the DEIR, a relatively large, acceptably permeable soil area has been identified within the proposed leach field area, just south of the proposed engineered fill footprint, and set back 100 feet from the property line. The evaluation concludes that the project site is suited for a Pressure Dose sewage disposal system with a minimum of 1,935 lineal feet of leach line. A minimum 10,000-gallon septic pump tank with watertight risers over each lid and an outlet effluent filter would be required. The pump tank would be oversized in order to accommodate for potential power loss, backups, and surge flows in the future.

Response to Comment Ind 406-6

The commenter states that the dewatering of the mine is wasteful but does not state how the DEIR is inadequate. By increasing flows to South Fork Wolf Creek, the project would produce a surplus of water. The commenter is referred to Chapter 4.8 and Appendix N of the DEIR and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 406-7

The commenter summarizes their opposition due to a variety of perceived impacts. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 407

From: Joyce Hoffman
To: Idaho MMEIR
Subject: Against Rise Mine, a new issue
Date: Friday, April 1, 2022 11:32:33 AM

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April 1, 2022

To Matt Kelley, Nevada County Planner

This letter is to bring up another concern I have over the potential Rise Mine project. I am against the mine for all the reasons that have already been mentioned in the paper and at the meetings. But another concern is over wildfires. Last year, we had a terrible scare when part of their property was on fire. It was very close to town and many businesses as well as neighborhoods were on alert.

Ind 407-1

My question is, why hasn't the county or the city of Grass Valley asked the owners of Rise's properties to clear out dry, damaged, or congested vegetation and create a fire break between their property and the surrounding properties?

Please include this issue and address it in response to the community's objections to the Rise endeavor.

Thank you.

Joyce Hoffman, Ph.D.
266 North Auburn Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 407: JOYCE HOFFMAN

Response to Comment Ind 407-1

Please see Master Response 6 – Wildfire Impacts. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 408

April 4, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly,

Thank you and the Planning Department for your dedication to hearing from the general public about the potential of bringing industrial mining back to Nevada County. I am among those in strong opposition to the plan proposed by Ben Mossman and the company he represents, Rise Gold.

Ind 408-1

The EIR Noise Report does not address the real impact of living next to an Industrial Mining Operation. Last summer when Rise Gold was doing test drilling the vibrations from the drilling could be felt coming up through our floor boards. The EIR downplays the noise coming from blasting and drilling underground as nonexistent when we in fact know from experience this is not the case. . Running a crushing machine 24/7 inside a building is going to emit a great deal of noise. Again the EIR downplays this as modern mining techniques. The trucks running from 8am to 10 pm will greatly impact our quiet country lifestyle. The EIR says this will be no more than regular traffic noise. WE know in fact that every dump truck backing up emits a warning siren that will carry up through our forest and greatly impact our lives.

We are asking for a more in depth study on the noise potential for the mine. Sleep is an important factor in the health and welfare of our community. Our property is within a quarter mile of the mine site.

Sincerely,

Jude Bischoff
Residence Address:
11010 Brunswick Dr.
Grass Valley, CA 95945

Mailing Address:
PO Box 1202
Cedar Ridge, CA 95924

INDIVIDUAL LETTER 408: JUDE BISCHOFF

Response to Comment Ind 408-1

Please see Master Responses 1 and 2.

The analysis of potential noise and vibration impacts can be found in Chapter 4.10, Noise and Vibration, of the DEIR. Mitigation Measures 4.10-1 through 4.10-4 have been incorporated into the project to reduce the severity level of potential impacts that would otherwise be significant. In the case of Impact 4.10-1, the DEIR discloses that even with incorporation of Mitigation Measure 4.10-1, the impact would remain significant and unavoidable. Thus, the analysis within the DEIR does not downplay the severity of potential impacts that could occur through implementation of the proposed project. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve or deny the project. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 409

Ind 409-1

RISE GRASS VALLEY

Rise Grass Valley
PO Box 271
Grass Valley CA 95945

From:

SACRAMENTO CA 957
16 FEB 2022 ECRWSH R002L
P-3 P67 104
Judith Bea Brown
13427 Sunshine Valley Rd
Grass Valley, CA 95945-9602

Dist 1

THE ID
A PROU

TO

Clerk of the Board,

950 Maidu Avenue, Ste. 200,

Nevada City, CA 95959

RECEIVED
FEB 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

The Idaho-Marylar ... er, air most productive a ... or from in the United State ... 2.4 million ounces ... The mine closed i ... ley's of gold at $35 per ... ite American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project ... hundreds of good-paying jobs and realize broad economic benefits for Nevada County.



Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

NO!

INDIVIDUAL LETTER 409: JUDITH BROWN

Response to Comment Ind 409-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 410

From: Judith Cooper <jcooper45@gv.net>
Sent: Saturday, April 2, 2022 2:07 PM
To: Planning
Subject: Rise Gold & Reopening of Idaho Maryland Mine

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Dear Planning Commission,

Ind 410-1 I've lived in Nevada County for 41 years after 10 years in San Francisco. What a pleasure it's been to live here with so much natural beauty, much less traffic/congestion, noise & pollution.
I'm horrified that you are considering allowing the reopening of the Idaho Maryland Mine. To do so will increase traffic, noise, air pollution, water pollution, impact local wells, threaten wildlife & change the aesthetics of our beautiful community.

Ind 410-2 How much water would the mine use when we're already in severe drought conditions? Last year, NID expected homeowners, like myself, to cut back their water usage by 20%. I've done this & continue to do this. I do not wish to cut back further to accommodate a gold mining project.

Ind 410-3 And for what? Jobs? Mining is the lowest job creator in US industry.
Please, please, please do not approve the mine reopening. You live here, too. Let's enjoy & appreciate our community as it is today.
All good wishes,
Judith Cooper
105 Woodcrest Way
Grass Valley, CA 95945

1

INDIVIDUAL LETTER 410: JUDITH COOPER

Response to Comment Ind 410-1

Please see Master Response 1. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 410-2

As detailed on page 3-39 of the DEIR, the Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings. Once dewatering is completed, approximately 1.9 cubic feet per second (cfs), or 850 gallons per minute (gpm) (approximately 1,224,000 gallons per day [gpd]), are estimated to be pumped to the surface and settling pond. Such water would support all project-related water demand (i.e., mining and processing activities), except for water purchased from NID. The process plant would run on a closed circuit. Please also see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 410-3

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 411

RECEIVED
APR 04 2022
COMMUNITY DEV AGENCY

Judith DeVine
P.O. Box 942
Cedar Ridge, CA 95924
April 4, 2022

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Matt Kelley,

Ind 411-1 This is a passionate plead for you and All involved to vote against the mine - so called Rise Grass Valley. At the DEIR meeting they told many lies. Now they are using photos of children to try to ligitamize their covetous spirit and actions. They plan to steal property values and water rights of many people, and fill our air and water with their polutants and call it good.

Ind 411-2 Their trucks will tear up our roads and carry explosives over already congested roads causing more noise and congestion. And unsightly scenery. They will make it ugly and unfit for humans and animals.

Ind 411-3 They are nothing but thieves and liers, and care nothing about the people living in the area. They only want the gold that they say will make Grass Valley a great place to live. What a joke! Please see through the lies.

Sincerely with Passion!
Judith DeVine

P.S. I'm a resident of the area myself, it is personal!

INDIVIDUAL LETTER 411: JUDITH DEVINE

Response to Comment Ind 411-1

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 411-2

Please see Master Response 1, as well as the discussions and analyses in Chapter 4.1, Aesthetics, and Chapter 4.7, Hazards and Hazardous Materials, of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 411-3

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 412

Matt Kelby 4-1-22
Nevada Co Planning Dept

To whom it may concern

We object to the proposed Idaho Maryland Mine.

Ind 412-1

Concerns about the dewatering of wells
Large truck traffic
Blasting
Noise
Should not be in a residential area
air quality

Please vote no!

Judith S. Emmons
Judith S. EMMONS
Lawrence D Emmons

856 Morgan Ranch Dr
Grass Valley CA 95945

530-205-9740

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 412: JUDITH AND LAWRENCE EMMONS

Response to Comment Ind 412-1

Please see Master Response 1. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 413

March 26, 2022



Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Ave., Suite 170
Nevada City, CA 95959

RE: Mine Comments / Opposition

Dear Mr. Kelly:

I am a home owner off Greenhorn in Grass Valley. I was a Chiropractor in the Bay Area for 30 years and had a ten year plan to retire and move to the Grass Valley area.

I absolutely love our home, neighborhood and community. I have never in my life felt so much a part of where I live. I thought I would live my golden years here, enjoying the quiet serene mountain life.

Ind 413-1 If the mine gets approved, all my dreams will be shattered. In fact, I will most likely be forced to move, which breaks my heart.

My biggest opposition to the reopening of the Idaho-Maryland Mine as pertaining to the DEIR as follows:

1. The impact analysis on the wells in the DEIR underestimates potential impacts and has highly inadequate mitigation measures. No impact report can accurately assess the flow of underground water in the midst of a 22 year drought, especially stretched out over 80 years. There needs to be a written solution to remedy any well affected by the mine (contamination or reduced water flow), which could be hundreds.

Ind 413-2
2. Air Quality impact is inadequate in the DEIR. The air quality in Nevada County is already poorer than I am comfortable with. ANY additional toxic particles reaching our lungs in unacceptable in Grass Valley.

Ind 413-3
3. Noise and Visual impacts which cannot be mitigated. The natural character of our mountain community should not be subject to buildings of 8-16

stories high! This ignores existing building height limits of 45 feet. I will be forced to look at this unsightly mess every time I drive out.

4. Increased traffic by trucks running morning until night as outlined by the DEIR, cannot be mitigated. The emissions put out by these vehicles is again affecting our air quality and runs counter to our efforts as a community to reduce greenhouse gas emissions.

Ind 413-4

Please Choose No Project, No Build Option

We in Grass Valley and Nevada City do not define ourselves by having an active mine in 2022. It will hurt tourism, home values and most importantly our quality of life.

Vote No on the re-opening of the Idaho-Maryland Mine.

Thank you,

Judy McGrain

INDIVIDUAL LETTER 413: JUDY MCGRAIN

Response to Comment Ind 413-1

Please see Master Responses 14 through 16 regarding groundwater and impacts to wells. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 413-2

Please see Master Responses 18 through 22 regarding air quality. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 413-3

Noise and vibration impacts are addressed in Chapter 4.10, Noise and Vibration, of the DEIR sets forth Mitigation Measures 4.10-1 through 4.10-4 to reduce the severity level of potential impacts that would otherwise be significant. In the case of Impact 4.10-1, the DEIR discloses that even with incorporation of Mitigation Measure 4.10-1, the impact would remain significant and unavoidable. Additionally, please see the discussions and analyses in Chapter 4.1, Aesthetics, of the DEIR which in Impact 4.1-2 finds the project would result in a significant and unavoidable impact to visual character and quality of the area. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Response to Comment Ind 413-4

Please see Master Response 1 and Response to Comments Ind 413-2 and Ind 413-3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 414

From: Judy Miner <jaminer3@gmail.com>
Sent: Saturday, April 2, 2022 2:34 PM
To: Idaho MMEIR
Subject: DEIR for reopening Idaho Maryland Mine

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Dear Matt Kelley and Nevada County Planning Department,

Ind 414-1 My husband and I (Brian and Judy Miner) strongly object to the opening of the Idaho Maryland Mine and the Canadian company proposing this endeavor. Rise Gold's past projects produced failures that compromised the surrounding land and nature while providing zero resources for recouping the damages they created. More importantly, we believe that opening the mine would be detrimental to our community, environment, water supply, wildlife, real estate values, and most importantly our quality of life in this beautiful community we've called home for the last 6 years.

In 414-2 Reasons for objecting to the opening the Idaho-Maryland Mine are as follows:

- **Ind 414-3** Rise Gold's plans to dewater the mine puts wells, creeks, and aquifers at risk.
- **Ind 414-4** Our air quality is already poor in our community. This will make a bad situation truly terrible with Fugitive dust from rock crushing, transporting, and diesel exhaust from constant truck traffic.
- **Ind 414-5** Gold mining is a power-hungry business, which will require significant use of fossil fuels. The mine's estimated power usage will be 12% of what the whole of Nevada County uses in a year, raising questions about further straining our power grid and effectively erasing the gains our County was planning to make in reducing power consumption to curb climate change.
- **Ind 414-6** Increased truck traffic, higher noise levels, and vibration from blasting will ruin our neighborhood quality of life. Our natural settings will be compromised and get buried beneath mountains of mine waste and a paved industrial area.
- **Ind 414-7** The enormous unimaginable environmental risks far out way the few jobs gained, (false claims of bringing jobs to the community are misleading and statistically and feasibly false), which includes tourism, high tech businesses, private wells, and 10's of millions lost in property values, all of which were NOT included in the current environmental review process. Analysis and study of these economic impacts must be included in an economic analysis in the Draft Environmental Impact Report (DEIR).
- Rise Gold is untrustworthy given their 14 year old company history, have never opened a mine and never made a profit. Their current financials are weak. And most importantly, their CEO's prior venture polluted tribal waters, went bankrupt, and left Canadians with a bill to pay for cleanup.

Ind 414-8 It is no longer the 1940s when this area was a small little mountain town. It is a sprawling beautiful community. The impact of this reopening would be devastating to our community and adversely affect all those that call it home, including our Cedar Ridge home, which would be directly affected due to its proximity to the mine.

The cost to the community and the surrounding areas is too great and MUST NOT HAPPEN! For the reasons outlined, coupled with Rise Golds dubious and untrustworthy record, we vehemently object to the reopening of The Idaho-Maryland Mine.

1

Thank you for your time. We hope you will do the right thing for our community and it's citizens and object to the opening and VOTE NO.

Sincerely,

Brian and Judy Miner

Sent from my iPad

INDIVIDUAL LETTER 414: JUDY AND BRIAN MINER

Response to Comment Ind 414-1
Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 414-2
Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project's impacts to groundwater but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 414-3
Please see Master Responses 12 and 18 through 23. The commenter expresses general concerns regarding the project's air quality impacts but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 414-4
Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 414-5
Please see Master Responses 1 and 8 through 10. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 414-6
Please see Master Response 2.

Response to Comment Ind 414-7
Please see Master Response 3.

Response to Comment Ind 414-8
Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 415

DO NOT!

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 415-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) JULIE BARNUM

Address 12864 LAKESHORE N ZIP 95602

Phone 530 613 4255

Email Address JRCLWING@GMAIL.COM

INDIVIDUAL LETTER 415: JULIE BARNUM

Response to Comment Ind 415-1

Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 416

TO: **Matt Kelley, Senior Planner – Nevada County Planning Department**

RE: **Comments on Rise Gold's Draft Environmental Impact Report**

My area of concern regarding Rise Gold's DEIR is the handling of the Centennial Industrial Site. In the Executive Summary (Chapter 2), there is a summary of project alternatives (2.4), and Alternative 2 calls for the Elimination of the Centennial site—an alternative that the DEIR promotes as the best choice for the environment.

However, this alternative definitely does not meet CEQA guidelines. The Centennial site is a noteworthy part of the whole mine proposal, not an isolated piece of property, and CEQA guidelines specifically define a project as "the whole of the action" that may result either directly or indirectly in physical changes to the environment.

By omitting the Centennial site from the environmental review process, Rise Gold is sidestepping its obligation to clean up the site—a site where toxic mine waste was deposited several decades ago. Last year, Rise Gold submitted a Remedial Action Plan to the Department of Toxic Substances Control that called for the destruction of healthy wetlands and riparian areas that cover close to 70 percent of the whole site.

Ind 416-1

According to the RAP, Rise Gold wanted to dig up existing wetlands to use as clean fill to cap the contaminated portion of the site. But the wetlands on the property are *uncontaminated*, and they play an active role in the ecosystem. Among other functions, they filter water, reduce erosion and sequester greenhouse gases. They are a precious natural resource and they need to be protected, not used as a "cap" and destined to be buried under tons of rubble trucked from the mine site in the future.

From what I understand, there was so much hue and cry from the public regarding the RAP that the DTSC has yet to formally endorse the proposed clean-up plan. And yet, in Chapter 4 of the DEIR, there is an aerial photograph that shows a big white patch in the middle. Under the photo, the caption reads: Figure C – "IMM Project Baseline after DTSC Cleanup."

This means Rise Gold is attempting to use an adjusted environmental baseline—a future baseline that ignores the present conditions and assumes that the DTSC clean-up has already taken place, which again, does not comply with CEQA guidelines, which state: "An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published." Therefore this section of the DEIR is flawed and deficient and needs to be rewritten.

I appreciate having you include my comments in the record.

Julie Becker 13345 Evergreen Drive Nevada City - Submitted April 2, 2022

INDIVIDUAL LETTER 416: JULIE BECKER

Response to Comment Ind 416-1

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 417

March 30, 2022

Matt Kelley, Senior Planner
Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Keeley,
I am writing in response to the DEIR and the proposal to re-open the Idaho-Maryland Mine by Rise Gold. I'm deeply opposed to it. A mine that would operate 24 hours a day, 7 days a week, up to 80 years is shocking, which should be enough to stop the mine right now. Mitigations in the DEIR that deal with the following concerns are inadequate:

Ind 417-1 The airborne toxic mining dust, i.e. asbestos and other toxins, would worsen our air quality. Our air quality is already a problem that will be aggravated by the Climate Crisis. Our children in Nevada County already have high levels of asthma, because of poor air in Nevada County. Claims that a few hundred local jobs will be created (if even true) do not justify the serious threat that this mine will be to our children and adults over 80 years. We don't have the right to allow this mine to damage present or future generations. We need to clean up our air, not allow it to be made worse.

Ind 417-2 Blasting 7 days a week in tunnels under 2,585 acres across Grass Valley and a large factory on Brunswick Road in the middle of hundreds of family homes in a residential community can't be mitigated. Trucks

Ind 417-3 hauling 1,000 tons of waste rock every day, all day long along Brunswick Road and piling the rock higher than a 6 story building at the Centennial site is shocking!!!

Removing 1 to 3 million gallons of contaminated water per day for the next 80 years and dumping it into Wolf Creek and contaminating the Creek is horrific. The de-watering of homeowners' wells is also a

Ind 417-4 very serious risk to take, which people and the school up on the Ridge have had to struggle with. This, along with all the other issues should be enough to stop all future mining in Nevada County.

We have also been living for 66 years with the toxic waters of the Empire Mine, with the State of California still trying to it clean up. Taxpayers are paying to clean up the water, because the mine owners walked away without being held responsible for the damage.

These are a just a few of the serious problems that the mitigations can't deal with. I have lived in Nevada County for 33 years and love our community. We live in a beautiful County that deserves to live in peace

Ind 417-5 and quiet and not be damaged by a company only interested in the money filling the owners' pockets.

Please share this letter with the rest of the Planning Commission. Please stand up to stop this mine by recommending that the Supervisors deny this mine permit.

Sincerely,
Julie Carville

Julie Carville
14582 Alderwood Way, Nevada City
530 265-4741
mtngypsy1@sbcglobal.net

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APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 417: JULIE CARVILLE

Response to Comment Ind 417-1

Please see Master Response 1, 16, and 18 through 24. The commenter expresses general concerns regarding the project's impacts to air quality but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 417-2

The DEIR evaluates the potential for the proposed project to generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of applicable standards under Impact 4.10-3, which starts on page 4.10-37. As detailed therein under the Blasting subheading, based on project site characteristics and a long-term blasting noise level survey conducted for the proposed project over the course of 30 days at the Sutter Gold Mine in Amador County, the worst-case maximum noise levels at the nearest noise-sensitive receptors to the project site would range from 52 to 57 dBA L_{max}. The range of predicted worst-case blasting noise levels of 52 to 57 dBA L_{max} is below the daytime, evening, and nighttime dBA L_{max} criteria at the nearest receptors (refer to Table 4.10-6 on page 4.10-18 of the DEIR for daytime, evening, and nighttime noise criteria for each receptor).

Response to Comment Ind 417-3

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 417-4

Please see Master Responses 13 through 15 and 35. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 417-5

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 418

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MAR 0 3 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Ave. #200
Nevada City, CA 95959

Dear Heidi Hall, Ed Scofield, Dan Miller, Sue Hoek and Hardy Bullock,

I have been a resident of Nevada County for 25 years and have lived on Greenhorn Road for the past 7 years.

Ind 418-1 I am writing to express my deep opposition to the reopening of the Idaho-Maryland Mine. I have read the summary DEIR and listened to many informed opinions. The significant number of potential, and even probable, negative impacts to our area are alarming. Noise, traffic, vibrations from underground blasting, air and water pollution, loss of well water for local residents. All of these, and more, should give us pause before gambling away our quality of life.

Ind 418-2 Given what is at stake, and to evaluate the potential risks, it is essential to understand the background of the Rise Gold company. I hope you have all read the 2/22/22 column in The Union written by Randal Snodgrass. He points to the company's last project, where Rise Gold filed for bankruptcy and left the public and government with hundreds of thousands of dollars in costs. Rise Gold was charged with 35 counts of failing to comply with environmental and safety standards.

We can see clearly who Rise Gold really is. We can choose to avoid the losses suffered by the people of British Columbia.

Ind 418-3 The remaining issue will be how to provide more jobs in Nevada County. Universal broadband, filling out infrastructure in existing industrial areas are potential starts. True leadership will take us in new directions, not repeating the errors of the past.

Thank you,
Julie Enzor-Wilson

Julie Enzor-Wilson

INDIVIDUAL LETTER 418: JULIE ENZOR-WILSON

Response to Comment Ind 418-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 418-2

Please see Master Response 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 418-3

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 419

Matt Kelley
Nevada County Planning Commission
950 Maidu. Ave. Suite. 170
Nevada City, CA. 95959

Dear Mr. Kelley,

Ind 419-1 I have been a resident of Nevada County for 25 years and have been living on Greenhorn Road for the past 7 years.

I am writing to express my deep opposition to the reopening of the Idaho-Maryland Mine. I have read the DEIR Summary and listened to many informed opinions. The potentially harmful impacts to our community are many and alarming.

Ind 419-2 First, the aesthetic degradation of our area from noise, traffic, vibrations from underground blasting, in addition to a six story industrial building, have no place in a tourist focused area. Though these issues were addressed in the DEIR it is absolutely true that these problems will still exist. It will be a great loss to those of us who chose to live here for the peace of a rural community.

Ind 419-3 An even more alarming impact will be on our water, both the quantity and the quality. It has been documented that California is experiencing the worst drought in 1200 years. Absolutely no one is suggesting that we will return to pre drought conditions any time soon. In these circumstances it would be negligent and potentially disastrous to allocate such enormous amounts of water to a foreign entity - one which is currently charged with water pollution in their last project. The DEIR does not address climate change and is inadequate to meet the moment. To suggest that adding 30 wells to NID will solve the problem is an insult to all of us

Ind 419-4 These and the many other potential harms of reopening the mine far outweigh the benefits. Please reject this project.

Sincerely,
Julie Enzor-Wilson
16495 Greenhorn Rd.
Grass Valley, CA 95945

Julie Enzor-Wilson

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MAR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 419: JULIE ENZOR-WILSON

Response to Comment Ind 419-1
Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 419-2
As affirmed by the commenter, pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project. Please see Master Responses 1 and 2.

Response to Comment Ind 419-3
Please see Master Responses 13 through 16 regarding groundwater. The commenter expresses general concerns regarding water quality and quantity impacts associated with the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 419-4
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 420

From: Juliette Phyllis Kunin
To: Idaho MMEIR
Subject: Proposed mine reopening
Date: Monday, March 14, 2022 3:40:55 PM

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

To whom this may concern,

I do not understand why this proposed mine has even a chance of being approved.

Ind 420-1

From the stories questioning the integrity of the company itself, the obvious air, water, sound pollution, why in the world would we be approving a Canadian firm to come in to our beautiful area and risk ruining our way of life????

We still have mercury in the waters from mining done decades ago. This company does not even have a game plan for how not to pollute our waters again! A mine that will be operating constantly will be very noisy as well as having a terrible impact on our air.

Ind 420-2

Our property values will go down, our wells may be impacted and our wonderful water polluted.

How could this tragedy even have a chance of happening?????

Someone please explain to me.

Thanks for the opportunity to give my input and I pray that this will not happen.

Thank you, Phyllis Kunin

INDIVIDUAL LETTER 420: JULIETTE KUNIN

Response to Comment Ind 420-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 420-2

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

June A. Oberdorfer, March 27, 2022

Comments on Groundwater Modeling, Idaho-Maryland Mine

Documents reviewed:

1) Itasca Denver, Inc., March 2020a, *Predictions of Groundwater Inflows to the Underground Mine Workings at the Idaho-Maryland Mine.*
2) EMKO Environmental, Inc., March 2020a, *Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
3) EMKO Environmental, Inc., March 2020b, *Appendices, Groundwater Hydrology and Water Quality Analysis for the Idaho-Maryland Mine Project, Nevada County, California.*
4) Itasca Denver, Inc., December 2020b, *Groundwater Monitoring Plan, Idaho-Maryland Mine Project.*

Concerns:

Simulations by Itasca (2020a) of the effects of mine-dewatering produced a map of predicted drawdowns after 25 years of dewatering (Figure 5-7). The contours of equal groundwater drawdown in this figure show a maximum drawdown of approximately ten feet and the extent of drawdown over one foot approximate the limits of Rise Gold's mineral rights. This figure was reproduced by EMKO (2020a) and served as the basis for determining which private wells would experience excessive drawdown and thus need to be mitigated with a supplemental water supply from the Nevada Irrigation District.

Ind 421-1

An incorrect assumption was made in the running of these future predictions of mining impacts which led to a significant underestimation of groundwater drawdown, both in magnitude and areal extent. This assumption needs to be corrected to get both a more accurate prediction of the extent of the well drawdown caused by the predicted 25 years of mine-dewatering and a more accurate determination of the number of wells needing to be mitigated with supplemental water supply.

The computer model was calibrated to match historic dewatering rates (700 gallons per minute [gpm] toward the end of historic mining in 1956) and one groundwater measurement taken from near the end of the historic mining period at the Union Hill Mine shaft (a small mine that had been inactive for many decades). These calibrations are reflected in Figure 4-7 (Itasca, 2020a). The lower part of this figure shows a hydrograph (water elevation versus time) for simulated water levels within the New Brunswick Mine for the 700-gpm dewatering rate. Simulated water levels in the mine were around 1,150 feet above mean sea level (ft amsl) at the end of historic mining and recovered rapidly to about 2,500 ft amsl after the cessation of mine-dewatering.

The top portion of Figure 4-7 (Itasca, 2020a) shows a hydrograph of the calibration to the historic water level measurement in the Union Hill Mine shaft at the end of mine-dewatering when the water level was approximately 20 feet lower than at present. In order to calibrate to this

one historic water level, Itasca had to insert a very low permeability barrier next to the Union Hill Mine into the model to create sufficient hydraulic isolation of the Union Hill Mine from the much lower water levels in the adjacent area. The hydraulic isolation of this Union Hill Mine area is supported by the fact that the current water levels in its shaft are about 165 feet higher than water levels in the New Brunswick Mine.

What is not known, other than at this one point in the Union Hill Mine, are the shallow groundwater levels in 1956. Itasca (2020a) does not present a map of groundwater drawdown for 1956 (as they do for the predictive modeling of 25 years into the future). Those simulated water levels in 1956 would provide important insights into what future water levels during mine dewatering would be and should be presented.

The water level in the Union Hill Mine shaft is shallow, and it is quite likely that the drawdown in 1956 in the shallow groundwater to the west (in the vicinity of the New Brunswick Mine) was significantly greater than the 20 feet observed at the Union Hill Mine, probably on the order of or greater than the 165-foot water level difference observed at present. Water levels to the west could have been on the order of 185 feet or more lower than present (20 feet plus 165 feet). It is a major shortcoming of Itasca's modeling report that they do not provide a drawdown map or hydrographs of the effects of historic mine-dewatering on the shallow aquifer.

The incorrect assumption that was made in the predictive modeling of future 25 years of mine-dewatering was in the initial condition (starting water levels) for that predictive simulation. Rather than taking present day water levels as the starting point for predicting the effects of mining for 25 years starting in 2019, they chose to use the water levels at the end of mining in 1956 (Sec. 5.1). Those water levels don't reflect the fact that there's no current dewatering, but rather reflect dewatering at a rate of 700 gpm. The incremental drawdown from increasing dewatering from 700 gpm to the future rate of 900 gpm is what is reflected in the map of impact (Figure 5-7, Itasca, 2020a) used to determine the area requiring mitigation by Rise Gold. Examining the predicted drawdown in Figure 5-7 in the vicinity of the Union Hill Mine, it would be expected to be greater than the historic drawdown measured of 20 feet if dewatering has increased over the historic rate. With drawdown being proportional to pumping rate, the drawdown would be expected to be on the order of 25 feet in the vicinity of the Union Hill Mine. Instead, drawdown in this area is on the order of a few feet (Fig. 5-7). Drawdowns further to the west in the vicinity of the New Brunswick Mine should be considerably greater than 20 feet, which they are not. This reduced drawdown compared to what was observed historically is the result of the incorrect assumption for the initial condition for predictive modeling.

This incorrect assumption minimizes both the magnitude of drawdown shown on the Figure 5-7 and the extent of the area affected. In addition to underestimating the number of domestic water supply wells impacted and requiring mitigation, this assumption also underestimates the extent of the area requiring groundwater monitoring (Itasca, 2020b). That area needs to be expanded. If the effects on dewatering on the discharge to nearby streams were calculated similarly to the effects on groundwater drawdown, then the amount of decrease in groundwater discharge to adjacent streams could be underestimated as well.



Itasca should clarify the results of their simulations by producing:

1) Both a groundwater drawdown contour map and a groundwater elevation contour map for the shallow aquifer immediately before the cessation of dewatering in 1956.
2) Hydrographs for simulated heads in the shallow aquifer for the historic period 1920 to 2020 plus continuation for the 25 years of predictive modeling for future mining. The hydrographs should be for groundwater elevation in ft amsl versus time for the 125 years and represent the heads in the shallow aquifer near wells labeled WS95, WS216, WS201, WS80, WS 91, and WS85 on Itasca Figure 2-6.
3) Model water budget (all volumetric water inputs and outputs) for the general area of the mineral rights boundary over the 125 years simulated, preferably in plot rather than tabular format, using the one-month time increment used in the modeling.
4) The model should be run using the 2019 water levels as the initial conditions for the predictive simulations. Contour maps, hydrographs, and water budgets should be provided for these revised predictive runs.

Figures Cited

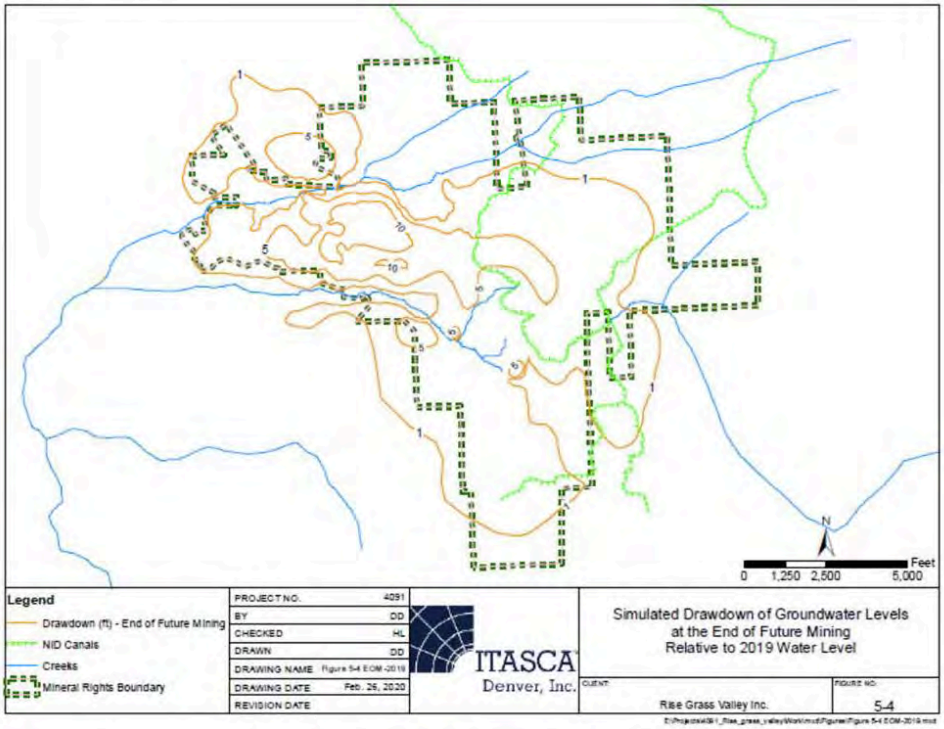
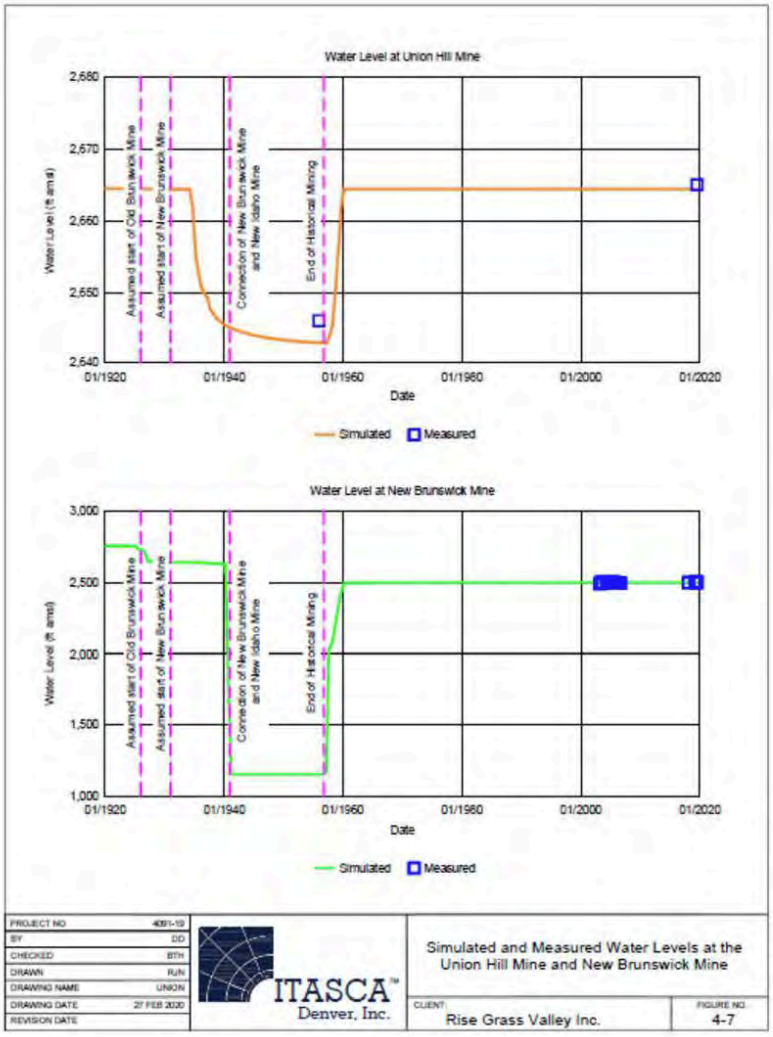


Figure also reproduced as Figure 4-1 in EMKO (2020a) as basis for extent of area of significant impact to shallow domestic wells requiring mitigation.


Water Level at Union Hill Mine
Water Level (ft amsl)
2,680
2,670
2,660
2,650
2,640
Assumed start of Old Brunswick Mine
Assumed start of New Brunswick Mine
Connection of New Brunswick Mine and New Idaho Mine
End of Historical Mining
01/1920
01/1940
01/1960
01/1980
01/2000
01/2020
Date
Simulated
Measured
Water Level at New Brunswick Mine
Water Level (ft amsl)
3,000
2,500
2,000
1,500
1,000
Assumed start of Old Brunswick Mine
Assumed start of New Brunswick Mine
Connection of New Brunswick Mine and New Idaho Mine
End of Historical Mining
01/1920
01/1940
01/1960
01/1980
01/2000
01/2020
Date
Simulated
Measured
PROJECT NO 4091-19
BY DD
CHECKED BTH
DRAWN RJN
DRAWING NAME UNION
DRAWING DATE 27 FEB 2020
REVISION DATE
ITASCA™
Denver, Inc.
Simulated and Measured Water Levels at the Union Hill Mine and New Brunswick Mine
CLIENT
Rise Grass Valley Inc.
FIGURE NO.
4-7

INDIVIDUAL LETTER 421: JUNE OBERDORFER

Response to Comment Ind 421-1

This letter is a duplicate copy of content in Group Letter 8. Please see Comments and Responses to Comments Grp 8-127 through Grp 8-133.

Individual Letter 422

Justine Jacus
District 1
Grass Valley

Nevada County Planning Department

To Whom It May Concern,

Ind 422-1 I have several points of view regarding the mining situation. Number one, is the amount of noise and traffic on the roads that will be generated from the mine, it is completely unacceptable.

Ind 422-2 Number two, is taking that much water from underground, and to do so during a drought and dredging up all the toxins that will come with it, is completely wrong. This will not only affect the environment; the streams, rivers, agriculture, air quality, and wildlife, but it will also directly affect citizens of Nevada County's personal underground wells. In my opinion, it will irrevocably change our way of life and change the serenity of this beautiful area we call home. As far as this company, Rise Gold, their past history alone should be enough to deem them unworthy to even work on this ill fated project. It should not be about one company's greed, it should be about preserving the quality of life that we have all come to love. I personally think their promise of boosting our economy is a sham, it will not bring jobs to our county, but will likely outsource jobs from elsewhere. The end effect being, lining the pockets within the company while negatively

Ind 422-3 affecting our community. And who is to say that they will not just shut down the mine leaving behind a huge toxic dump with no plan to clean it up. I want to see my children and grandchildren to be able to grow up in a beautiful community and area that has so much to offer, without reopening a mine that has the potential to destroy everything we love about this area.

Sincerely,
Local Citizen and Business Owner Since 1979

INDIVIDUAL LETTER 422: JUSTINE JACUS

Response to Comment Ind 422-1

Please see Master Response 1. Noise is addressed in the DEIR in Chapter 4.10, Noise and Vibration. Traffic is addressed in Chapter 4.12, Transportation. The commenter expresses general concerns regarding the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 422-2

Please see Master Responses 1 and 2, 14 through 16, 18 and 19, 30, and 35. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 422-3

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 423

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

March 23, 2022

Dear Commissions Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno

STATEMENT TO NEVADA COUNTY PLANNING BOARD

My name is Robert Foster. Live in Grass Valley at 122 Ironhorse Place, just off of Bennett Street. During my youth, I spent many dayts in adventure along the banks of the West Fork of Rock Creek, near Red Lodge, Montana. Those days were among the most formative, most important days of my youth. The West Fork of Rock Creek is very , very similar to Wolf Creek. That might be one reason I live in Grass Velley. During that time I grew close to the creatures that lived in that stream.

So, that is why I am here today. The creatures in Wolf Creek need a spokesman--. The Mayflies, the Caddis flies, the Stone flies and the Rainbow trout that live in Wolf Creek

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 423-1

I have read the entire DEIR. I have focused my attention on the section related to Hydrology, Chapter 4.8 of the DEIR. I find that section to be speculative and potentially dangerous—particularly dangerous to Wolf Creek. The Hydrology section contains opinions and statements that are shocking in their naiveté. Some of these opinions relate particularly to the maintenance and operation of the Settling Pond. Make no mistake about it, the Settling Pond is a key feature to the entire potential operation of the mine. Without the Settling Pond, the application would violate CEQUA, and have no possibility. And, from my perspective, the Settling Pond is one of the most dangerous features of the application. The Settling Pond takes water that contains Iron and Manganese amounts that far exceed limits, and Arsenic and Cyanide that exceed limits, and produces water for delivery into the South Fork, and on into Wolf Creek proper. When you read over the section on water treatment, there no doubt that treatment to remove the offensive materials is complicated, and requires constant attention, constant monitoring and constant money. All of the offensive materials are deposited on the floor of the Settling Pond. Thus, the

sledge at the bottom of the Settling Pond is intended to be a concentrated soup of materials that are potentially harmful and in some cases, known carcinogens. Antimony and Chromium are known carcinogens. The DEIR assumes, without any supporting facts, that the applicant will have the money and the will to spend what is necessary to keep the water within safe limits. That assumption is a totally false assumption. Everyone, including the applicant, knows that eventually the mine would become unprofitable. That happens to all mines, and will happen to this mine. When the mine becomes unprofitable, there will simply be no money for the proper treatment of water. The water released will then be toxic and likely contain known carcinogens. The answer to this hazard in the DEIR is that responsibility for safe operation of the mine becomes the responsibility of the State Water Resources Regional Board. Seriously?? This body would never assume responsibility for such a complicated and expensive operation. That entity, to my understanding, has three employees who are responsible for the entirely of Nevada, Placer, and Sierra Counties. From a practical point of view, the water, and potentially the sludge as well, would simply Flow into the Wolf Creek watershed. Goodbye Mayflies, goodbye Rainbow trout. Similarly, the DEIR assumes honest and faithful maintenance and operation of water treatment facilities. That assumption is false. This applicant has a demonstrated history of willful noncompliance with environmental rules. For the writers of the DEIR to assume faithful compliance is a serious assumption that is unwarranted by the history of this applicant.

The plan for removal of the toxic sludge is borderline comical. Again, the sludge will contain concentrated amounts of Manganese, Antimony, Chromium, Arsenic and Cyanide. The plan is to remove that material "off of site." I guess the idea is that you shut down mining operations, which is not going to happen, get some dump trucks into the Settling Pond somehow, and haul thousands of tons of material and dump that material "off of site." I guess the idea is that you pay somebody in Placer County or in Sierra County, to give you the right to dump this sludge on their property. What I find borderline funny is that these experts somehow believe that such a release of highly toxic material complies

with CEQUA. Seriously?? We have a new exception to the requirements of CEQUA, the "off of site" exception.

The fundamental assumption of the entire DEIR, is that everything is going to proceed according to their approved plans. The assumption is that compliance will be faithful and continuous, for a period of 80 years. From my point of view that assumption doesn't begin to pass the smell test. No gunna happen. What will happen, is some event, some series of events, which will cause a lapse in compliance. With a certainty, non-compliance will occur when the mine runs out of money. When that happens, it is more likely than not, that toxic water and toxic sludge will be released into Wolf Creek. There is then, the distinct possibility that Wolf Creek and maybe even The Bear River will be superfund site. That possibility is horrendous.

What I ask you to do is to return the DEIR to Sacramento, and ask the following questions:

Ind 423-2

1. Regarding water treatment: What it the plan for paying for water treatment after the Applicant is no longer able to pay for treatment?

Ind 423-3

2. Regarding periodic removal of toxic sludge from the Settling Pond:
   a. Will mining operations be shut down for removal of sludge?
   b. How long will removal take and how will it be accomplished?
   c. Who will pay for removal of sludge when the Applicant can't?
   d. How will disposal of the sludge be accomplished?
   e. Is there in place a definite plan for disposal of sludge that meets with CEQUA requirements?

Ind 423-4

Thank you. My goal here is to ensure that there is a healthy Wolf Creek for future Generations to appreciate and love.

Sincerely,

K. Robert Foster
122 Ironhorse Place
Grass Valley 95945

Tel: 209-366-4626

INDIVIDUAL LETTER 423: K. FOSTER

Response to Comment Ind 423-1

The commenter states that the settling pond is one of the most dangerous features of the project and water treatment is complicated and requires constant monitoring. The commenter states that the DEIR wrongly assumes the water treatment and settling pond component of the project will go according to plan without any accidents. However, the commenters does not explain how the DEIR is inadequate or how the settling pond will fail and discharge untreated water to South Fork Wolf Creek. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary. For information regarding the water treatment process, the commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As explained in the DEIR and Master Response 35, the primary method of on-site treatment is not the settling pond, but the water treatment plant, which will be permitted by the Central Valley Regional Water Quality Control Board.

The commenter also states that the DEIR fails to identify the management of the settled solids from the treated mine water. Section 5.4 of Appendix K.4 of the DEIR provides a detailed description of the management of settled solids in the water treatment pond. As described, the removal of these solids would not require the mine to shut down mining operations. The dewatered solids would be dewatered and hauled to an appropriate and approved offsite landfill.

Regarding the commenter's assertions that the Project Applicant will not implement the mitigation measures described in the DEIR, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 423-2

The commenter asks who will fund the water treatment process in the event the Project Applicant is unable to pay. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 423-3

The commenter asks a series of questions pertaining to the removal of settled solids from the settling pond. Section 5.4 of Appendix K.4 of the DEIR provides a detailed description of the management of settled solids in the water treatment pond. As described, the removal of these solids would not require the mine to shut down mining operations. The dewatered solids would be dewatered and hauled to an appropriate and approved offsite landfill.

Response to Comment Ind 423-4

The commenter states that their goal is to ensure a healthy Wolf Creek for future generations. The comment is noted.

Individual Letter 424

From: Kali Feiereisel <kali.feiereisel@gmail.com>
Sent: Sunday, April 3, 2022 8:48 PM
To: Idaho MMEIR
Subject: Mine Comment

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Dear Mr. Kelley,

I have been living in Nevada County for 11 years and my husband and I recently welcomed our daughter Mabel. We hope that she can grow up safely here, but this proposed mine is of high concern to us.

I am very concerned about arsenic, ammonia, and other contaminants from treated mine waste water polluting downstream irrigation water and prohibiting farmers from using the water.

Ind 424-1

A 2021 study by Sandil et al titled, "Effect of arsenic-contaminated irrigation water on the growth and elemental composition of tomato and cabbage cultivated in three different soils, and related health risk assessment," found that cabbage and tomato plants absorb the arsenic into their roots, leaves, and the edible portion of the crop. The study cites the arsenic threshold for drinking water is 10 µg/L (WHO, 2001), and for irrigation water is 100µg/L (FAO, 1994).

In chapter 4.81-1 of the DEIR, related to water it states, "The treatment process would also reduce the concentrations of arsenic and ammonia, both of which have been detected in low concentrations in surface seeps near the mine."

What does reduce mean? Please provide specific information on what levels of arsenic will be allowed to be in the treated mine waste water discharge. At a minimum the arsenic levels allowed in the treated mine water discharge should be aligned with the FAO's 100µg/L, if not more strict.

Ind 424-2

Additionally, the mine discharge water should not be tested once a quarter, but everyday, to have as close to real time tracking on the water (and any contamination it might be spreading) being discharged from the mine.

Thank you,
Kali Feiereisel

1

INDIVIDUAL LETTER 424: KALI FEIEREISEL

Response to Comment Ind 424-1

The commenter is concerned about arsenic, ammonia, and other contaminants being discharged to South Fork Wolf Creek. The commenter points to a study highlighting the harmful effects of these contaminants on soil and produce. The commenter states that the DEIR requires more specific information regarding these contaminants in the mine water. As indicated by Table 4.8-2 in the DEIR, the requirement for the treated mine water discharge is less than 10 micrograms per liter for arsenic and less than 25 micrograms per liter for ammonia. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 424-2

The commenter states that the water discharged to South Fork Wolf Creek should be monitored daily. Monitoring of water discharge will be done in accordance with requirements of the approved Notice of Intent and the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Individual Letter 425

From: Karen Farlee <karenfarlee@sbcglobal.net>
Sent: Saturday, April 2, 2022 8:15 PM
To: Idaho MMEIR
Subject: Mine DEIR

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Ind 425-1 In my opinion, the county should not accept the current EIR. The first and most important point to me is the effects on local water sources. Much of the data used was based on normal or average rain years. After 3 years of extreme drought normal and average water calculations do not hold up.

Ind 425-2 One of the other issues that concern me is air quality. First of all when you look at data based in Blue Canyon how much is applicable to Nevada City and Grass Valley. Locally we have been dealing with increased pollution from Sacramento Valley, let alone the effects to our air from local wildfires.

Ind 425-3 Please look carefully at the basis of lack of current local information and understanding local needs turn down this report and application for reopening this mine.
Karen Farlee
Nevada City

Sent from my iPad

INDIVIDUAL LETTER 425: KAREN FARLEE

Response to Comment Ind 425-1

This commenter is concerned with the impacts of the project on local water sources and is concerned that the DEIR uses average rainfall data in light of the drought that California is currently experiencing. However, the water supply assessment prepared for the project's water consumption includes analysis of single and multiple dry-year scenarios. Additionally, please see Master Response 16 - Drought and Climate Change.

Response to Comment Ind 425-2

This comment expresses concern regarding the project's impacts to air quality and questions the extent to which data based in Blue Canyon is applicable to Nevada City and Grass Valley.

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. In regard to existing baseline air quality, please see Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 425-3

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 426



Karen Melquist
18209 Cruzon Grade Road
PO Box 1675
Nevada City, CA 95959

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Re: DEIR Rise Gold

Commissioners:

I appreciate this chance to respond to the Idaho-Maryland Project draft EIR. The difficulty I have found in this document is tracking the ***dirt.*** **DIRT** - engineered, bare rock, wet, mixed, impermeable, clay, loamy - is what is left behind in a mining project whether it comes to an end as unprofitable, delayed, abandoned or bankrupt.

What it needs is a ***dirt*** budget similar to a water budget when analyzing a closed system. In order to visualize what is proposed, one has to coordinate shift schedules, vehicle schedules, vehicle capacity, mine development, projected fill site quotas, tonnage for vehicles, predicted trip numbers, cubic-feet, on and on it goes.

Ind 426-1

We are told that at planned capacity once the project is rolling the tons of material produced annually is 557,000 tons. At mining year 7, the two fill projects will have used 3,800,000 tons. An eighty-year permit less estimated 1.5 years for construction and the high of five years for closure, the applicant could mine for 72.5 years. To get a concept of how much ***dirt*** could accumulate at Brunswick in 72.5 years – ignoring gold concentrate and fill customers as a worst case – 35,620,000 tons of the stuff would accumulate.

In mining year 12, there is enough ***dirt*** to accomplish Alternative 3 – storing an additional 2.3M tons at Centennial. In mining year 15, another 1.7M could be stored at Brunswick. Ta-dah - Alternative 2! - a potential Alternative 5, a 20-year permit with 5 years for closure. 4,000,000 tons of the stuff tucked away. (Did you notice? The DEIR has two estimates for fill - 3.8M tons in the project description and 4M tons in the Alternatives. Tsk, tsk, an unexplained internal inconsistency of data.)

Missing for these scenarios:

Market study for **clean** fill needs within 60 miles (DEIR haul radius)

Qualified Engineer analysis of fill product

Ind 426-2

No closure plan for intermittent, inevitable or permanent shut down of project in re ***dirt***

OHV crowd will come from miles away – must include bond for 24/7 security

The phrase "engineered fill" is used (473 times in 1070 pages), replace with ***dirt*** and the picture of this project changes dramatically.

Ind 426-3

I was interested to find if the DEIR would tackle the subject of interconnected tunnels. It does admit Union Hill has "a poor hydraulic connection between these two mines" which is included in the water model. Apparently, there is no hydraulic connection to the behemoth to the West – the Empire - 367 miles of workings, 11,007 feet deep. There is no information on how closely those works are to this project possibly requiring an evaluation.

> Page 4.8-14 Union Hill Mine workings are within 95 to 180 feet of workings of the Brunswick at three or four different levels.

The water modeling did not run a scenario for the Union Hill abruptly flooding the Brunswick. No study of the strength of this material under years of vibration, blasting or dewatering has been included.

Ind 426-4

The DEIR looks at sink holes and dewatering only within the Project surface property (Geotechnical Assessment of Near Surface Mine Surfaces). No assessment is included of the impact on surrounding properties, not even the East Bennett impacted residences. The original information is NV5. Geotechnical Engineering Report, Idaho-Maryland Mine Project – **Brunswick Industrial Site** [pg. 11].November 18, 2019. Definitely a limited study.

> (I did learn a new historical term that's fun: shaft shifting where timber beams finally give way and there goes the back yard.)

Ind 426-5

Appendix K.9_Idaho-Maryland Well Mitigation Plan is included in the DEIR. It is an in-house document citing various authorities on the details of the proposed mitigation of 30 (26) wells on East Bennett. RISE will:

> Reimburse cost of NID annually
>
> Reimbursement will cease when the property is sold or the property is annexed to the City of Grass Valley

Neither Grass Valley, the current property owners nor future owners should pay for water so long as the company dewaters the wells. There is no guarantee the wells will recover – in volume or quality – once dewatering ceases. No mention is made for the inevitable temporary closures or abandonment of the project altogether. Is the County by issuing the permit the ultimate responsible party? An adequate bonding arrangement is required.

Ind 426-6

The monster in the closet is cleaning up the Centennial toxic dump. Since the 1960's when the property had reverted to private owners, yet nothing has been accomplished. IMM walked away; the City of Grass Valley walked away and RISE itself has delayed a real commitment. The Voluntary Cleanup Agreement may be "unilaterally terminated with 30-day notice." Unilaterally means for no reason, no consequence for failure to complete. The DEIR in deciding the environmentally superior plan is Alternative 2 (no Centennial use) .. ha, ha .. except for page 1-8, EIR PROCESS states

> While it may be suggested that the Centennial Clean-Up Project, were it to be successfully completed, could benefit the Idaho-Maryland Mine Project in a **limited way (i.e., serving only as a waste rock stockpile location)**, similar to the court's ruling in *Banning Ranch*, the Idaho-Maryland Mine Project would not be a "consequence" of the Centennial Clean-Up Project, as the Idaho-Maryland Mine Project can proceed without completion of the Clean-Up project.

There's that ***dirt*** again! The DEIR fiddles around on Alternative 2 ... doesn't mean it will, doesn't mean it won't..

Clean-Up of the Centennial (limited as it will be to capping) should be a condition of the permit before they create another.

Ind 426-7

Where's the market study for Nevada County's *critical need* for industrial acreage

Where's the Qualified Engineer analysis for Brunswick and Centennial sites – not landscape elevations

Where is the temporary closure plan for the inevitable over 80 years ...

open/close cycle for gold price fluctuation

for funding, for abandonment, for bankruptcy

that clay-lined pond requires maintenance every 10 years for one thing!

Ind 426-8

Eagerly awaiting release of the economic analysis - - library fund and all ...

Karen Melquist

cc: CEA-NC

Attachment



PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non-mineralized	total	I-M fill sites begin off-site sales total less 3.8M	revise for addl 4M on-site storage	
	24	4,380,000	8,760,000	13,140,000	9,340,000	5,340,000	
	25	4,562,500	9,125,000	13,687,500	9,887,500	5,887,500	
	26	4,745,000	9,490,000	14,235,000	10,435,000	6,435,000	
	27	4,927,500	9,855,000	14,782,500	10,982,500	6,982,500	
	28	5,110,000	10,220,000	15,330,000	11,530,000	7,530,000	
	29	5,292,500	10,585,000	15,877,500	12,077,500	8,077,500	
	30	5,475,000	10,950,000	16,425,000	12,625,000	8,625,000	
	31	5,657,500	11,315,000	16,972,500	13,172,500	9,172,500	
	32	5,840,000	11,680,000	17,520,000	13,720,000	9,720,000	
	33	6,022,500	12,045,000	18,067,500	14,267,500	10,267,500	
	34	6,205,000	12,410,000	18,615,000	14,815,000	10,815,000	
	35	6,387,500	12,775,000	19,162,500	15,362,500	11,362,500	
	36	6,570,000	13,140,000	19,710,000	15,910,000	11,910,000	
	37	6,752,500	13,505,000	20,257,500	16,457,500	12,457,500	
	38	6,935,000	13,870,000	20,805,000	17,005,000	13,005,000	
	39	7,117,500	14,235,000	21,352,500	17,552,500	13,552,500	
	40	7,300,000	14,600,000	21,900,000	18,100,000	14,100,000	
	41	7,482,500	14,965,000	22,447,500	18,647,500	14,647,500	
	42	7,665,000	15,330,000	22,995,000	19,195,000	15,195,000	
	43	7,847,500	15,695,000	23,542,500	19,742,500	15,742,500	
	44	8,030,000	16,060,000	24,090,000	20,290,000	16,290,000	
	45	8,212,500	16,425,000	24,637,500	20,837,500	16,837,500	
	46	8,395,000	16,790,000	25,185,000	21,385,000	17,385,000	
	47	8,577,500	17,155,000	25,732,500	21,932,500	17,932,500	
	48	8,760,000	17,520,000	26,280,000	22,480,000	18,480,000	
	49	8,942,500	17,885,000	26,827,500	23,027,500	19,027,500	
	50	9,125,000	18,250,000	27,375,000	23,575,000	19,575,000	
	51	9,307,500	18,615,000	27,922,500	24,122,500	20,122,500	
	52	9,490,000	18,980,000	28,470,000	24,670,000	20,670,000	

PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non-mineralized	total	I-M fill sites begin off-site sales total less 3.8M	revise for addl 4M on-site storage	
2022-2026 4 years	1	182,500	365,000	547,500			
	2	365,000	730,000	1,095,000			
	3	547,500	1,095,000	1,642,500	Centennial 1.6M 5 yrs		
	4	730,000	1,460,000	2,190,000			
	5	912,500	1,825,000	2,737,500			
2027-2032 5 years	6	1,095,000	2,190,000	3,285,000			
	7	1,277,500	2,555,000	3,832,500	Brunswick 2.2M 6-7 yrs 3.8M total		
	8	1,460,000	2,920,000	4,380,000	580,000		
	9	1,642,500	3,285,000	4,927,500	1,127,500		
	10	1,825,000	3,650,000	5,475,000	1,675,000		
	11	2,007,500	4,015,000	6,022,500	2,222,500		
2033-2102 69 years	12	2,190,000	4,380,000	6,570,000	2,770,000	2.3M addl to Centennial	
	13	2,372,500	4,745,000	7,117,500	3,317,500		
	14	2,555,000	5,110,000	7,665,000	3,865,000		
	15	2,737,500	5,475,000	8,212,500	4,412,500	1.7M addl to Brunswick: 4M total	
	16	2,920,000	5,840,000	8,760,000	4,960,000	960,000	
	17	3,102,500	6,205,000	9,307,500	5,507,500	1,507,500	
	18	3,285,000	6,570,000	9,855,000	6,055,000	2,055,000	
	19	3,467,500	6,935,000	10,402,500	6,602,500	2,602,500	
	20	3,650,000	7,300,000	10,950,000	7,150,000	3,150,000	
	21	3,832,500	7,665,000	11,497,500	7,697,500	3,697,500	store 4M
	22	4,015,000	8,030,000	12,045,000	8,245,000	4,245,000	Alternatives 2 &3
	23	4,197,500	8,395,000	12,592,500	8,792,500	4,792,500	

PROJECT YEAR	after 1.5 years construction mining year	fill tons mineralized	fill tons non-mineralized	total	I-M fill sites begin off-site sales total less 3.8M	revise for addl 4M on-site storage	
	53	9,672,500	19,345,000	29,017,500	25,217,500	21,217,500	
	54	9,855,000	19,710,000	29,565,000	25,765,000	21,765,000	
	55	10,037,500	20,075,000	30,112,500	26,312,500	22,312,500	
	56	10,220,000	20,440,000	30,660,000	26,860,000	22,860,000	
	57	10,402,500	20,805,000	31,207,500	27,407,500	23,407,500	
	58	10,585,000	21,170,000	31,755,000	27,955,000	23,955,000	
	59	10,767,500	21,535,000	32,302,500	28,502,500	24,502,500	
	60	10,950,000	21,900,000	32,850,000	29,050,000	25,050,000	
	61	11,132,500	22,265,000	33,397,500	29,597,500	25,597,500	
	62	11,315,000	22,630,000	33,945,000	30,145,000	26,145,000	
	63	11,497,500	22,995,000	34,492,500	30,692,500	26,692,500	
	64	11,680,000	23,360,000	35,040,000	31,240,000	27,240,000	
	65	11,862,500	23,725,000	35,587,500	31,787,500	27,787,500	
	66	12,045,000	24,090,000	36,135,000	32,335,000	28,335,000	
	67	12,227,500	24,455,000	36,682,500	32,882,500	28,882,500	
	68	12,410,000	24,820,000	37,230,000	33,430,000	29,430,000	
	69	12,592,500	25,185,000	37,777,500	33,977,500	29,977,500	
	70	12,775,000	25,550,000	38,325,000	34,525,000	30,525,000	
	71	12,957,500	25,915,000	38,872,500	35,072,500	31,072,500	
	72	13,140,000	26,280,000	39,420,000	35,620,000	31,620,000	
	73	13,322,500	26,645,000	39,967,500	36,167,500	32,167,500	
73.5 years of 80 permit	74	13,505,000	27,010,000	40,515,000	36,715,000	32,715,000	
begin closure 5 years							
permit expires at 78.5 yrs							

INDIVIDUAL LETTER 426: KAREN MELQUIST

Response to Comment Ind 426-1

The majority of the comment expresses a general opinion that the commenter had trouble tracking "the dirt" in the DEIR, but does not provide specific examples that would allow for a detailed response. The Project Description chapter of the DEIR provides a detailed description of the proposed engineered fill piles, including exhibits showing cross-sections.

The commenter points out that the additive tonnage of engineered fill at the Brunswick and Centennial Industrial Sites under the proposed project scenario, would total 3.8 million tons, whereas the total tonnage of engineered fill for Alternatives 2 and 3 appears to equal 4 million tons. This is a correct observation; however, it does not present an inconsistency for the following reasons. The conceptual design for the alternatives is not meant to be such that the sum of engineered fill from Alternative 2 and Alternative 3 equates to the total fill under the project scenario. For example, under Alternative 3 (Expansion of Centennial Fill Pile and Elimination of Brunswick Fill Pile), the additional tonnage to be accommodated at Centennial is 2.3 million tons, whereas the Brunswick Industrial Site would accommodate 2.2 million tons. Rather than design Alternative 3 to accommodate 2.2 million tons of additional engineered fill, it was determined that the dimensions of the Centennial Industrial Site could reasonably accommodate up to 2.3 million additional tons. Seen in this way, there is no inconsistency in the DEIR.

Response to Comment Ind 426-2

Please see Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets. The commenter's suggestions that OHV crowd will come from miles away is speculative; further, both the engineered fill piles at the Brunswick and Centennial Industrial Sites will be fenced. This portion of the comment is speculative, and CEQA does not require that an EIR analyze speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

The commenter states there is no closure plan. However, the project requires an approved Reclamation plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The Project Applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. The commenter is referred to page 4.6-24 and Appendix C of the DEIR.

The commenter asks that the DEIR refer to engineered fill as "dirt". Referring to rock and sand tailings (engineered fill) as "dirt" would not affect the analysis of project impacts.

Response to Comment Ind 426-3

The commenter suggests that the Union Hill Mine may have hydraulic connection to the Idaho-Maryland Mine and flooding may result. The Union Hill mine is discussed in Section 3.3.3.4 of Appendix K.2 of the DEIR. The Union Hill mine is a smaller mine than the others in the project area. It was closed in 1918 and has been flooded with water since that time. The Union Hill mine

is not connected to any of the other underground mine workings in the area but is in close proximity to the workings of the Brunswick Mine. On April 17, 2019, the water level in the Union Hill shaft was 165 feet higher than the water level in the New Brunswick shaft. The Union Hill mine workings are within 95 feet to 180 feet of workings of the Brunswick Mine at three to four different levels. The Brunswick mine tunnels in proximity of Union Hill were constructed around 1950. During the post WWII period, the combined Idaho-Maryland Mine workings were completely dewatered. In 1956, the water level at the Union Hill Mine was reported to be within 20 feet of the top of the shaft, suggesting that the complete dewatering of the adjacent mine workings resulted in no more than 10 to 20 feet of water level decline in the Union Hill Mine. A "conduit" has not formed between the mines in the previous 70 years, which included active mine operations, as evidenced by the different observed water levels.

Response to Comment Ind 426-4

The DEIR, in accordance with CEQA Guidelines Appendix G, evaluates the proposed project's potential impacts associated with being located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil under Impact 4.6-3, which starts on page 4.6-41. As discussed therein within the discussion of potential impacts related to collapse, the potential for collapse of existing near-surface mine features as a result of the proposed project is not the same as "sink holes" that occur within limestone environments where a gaping hole forms that may be tens or even hundreds of feet across. As such, the DEIR addresses the commenter's concerns related to sink holes. Please also see Master Response 29 – Near Surface Workings.

Please also see Master Response 7 – Location of Future Mining Areas. As stated therein, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202 in Appendix A to this Final EIR).

Response to Comment Ind 426-5

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. In addition, a revised Well Mitigation Plan has been prepared and is attached to this Final EIR as Appendix D.

Response to Comment Ind 426-6

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 426-7

The commenter raises concerns regarding the market demand for industrial acreage. Market analysis is not required for an EIR. In addition, future industrial use of the sites would only occur after reclamation and future planning and environmental review. The demand for industrial acreage in 80 years is speculative.

The commenter's concern regarding funding is noted, but these are considerations outside the scope of CEQA. Please see Master Responses 1, 2, and 4. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

The commenter states the DEIR is missing a "Qualified Engineer analysis for Brunswick and Centennial cites." Numerous reports and analysis, including geotechnical and other areas, have been conducted for the Brunswick and Centennial Industrial Sites. The commenter is referred to Chapter 4 of the DEIR.

Response to Comment Ind 426-8

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 427

Dist 3

RECEIVED

MAR 18 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: 3-15-2022

Dear Supervisors Sue Hoek, Heidi Hall, Ed Scofield, Dan Miller, and Hardy Bullock:

Ind 427-1 I work/~~own~~ a business in Nevada County and I am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corp. I expect that you will be voting on the project based on the Environmental Impact Report and community input.

I have listened to both sides of the argument and find the Rise Gold Corp. (RYES) reports and advertising to be inaccurate. They fail to adequately mitigate many significant negative impacts of this large industrial project on my community and business. It is in my business and personal interest that you do not approve this project.

Ind 427-2 My business's opposition to this project is based on RYES plans, reports and the DEIR (Draft Environmental Impact Report). Experts have reported to me that there will be significant increases in air pollution, traffic in key areas, noise from both above and below ground operations, wildfire evacuation blockages, reduction of our community's water resources, etc. They also report that any economic gains do not justify the costs to the County. Adding 312 jobs to the County workforce of approximately 44,000 is trivial no matter what the wages, and well-paying jobs will not go to County residents.

Businesses depend upon a quality living experience for residents and visitors alike. I am especially concerned about tourism, likely the largest single public industry in the County. Huge diesel trucks and machines spewing exhaust and using key access roads to Grass Valley are not going to improve our vital image as a tourist destination.

Many tourists come here for the outdoors, art, food and wine, and live performances. Please do not permit the County's attractive environment to be damaged by air and noise pollution, a large factory, waste dumps, and industrial traffic.

Sincerely,

Business Name: Eastridge Apartments

Individual Name: Karin Davenport

Address: 85 Rockwood Dr.

Phone number: 530-272-1888

~~Email~~: P.S. I manage an 80 unit Senior complex with Disabled and Frail Seniors. Which is a sizable responsibility. So I am speaking for a lot of people. Please don't open this Pandora's!

INDIVIDUAL LETTER 427: KARIN DAVENPORT

Response to Comment Ind 427-1

Please see Master Responses 1 and 2. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Response to Comment Ind 427-2

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 428

From: karolynrenee
To: bdofsupervisors
Subject: Stop the mine project
Date: Monday, January 17, 2022 7:19:12 AM

Dist 3

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 428-1

Protect our community, do not allow this mine to open!

Sincerely,
Karri Knowles

INDIVIDUAL LETTER 428: KARRI KNOWLES

Response to Comment Ind 428-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 429

3/8/22

Dear Mr. Kelley and Board of Supervisors,

Ind 429-1

I am strongly opposed to the proposed re-opening of the Idaho-Maryland Mine by Rise Gold. The community clearly does not embrace this project for numerous reasons, environmental as well as financial.

Please listen to us and do not approve this disasterous project.

Thank you,

Kate Frame

KATE FRAME

RECEIVED
MAR 09 2022
NEVADA COUNTY
PLANNING DEPARTMENT

RECEIVED
MAR 03 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 429: KATE FRAME

Response to Comment Ind 429-1

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 430

Nevada County Board of Supervisors
Eric Rood Administrative Center
950 Maidu Avenue
Nevada City, CA 95959

Mar 21, 2022

Subject: Comments on the Idaho Maryland Mine Project and DEIR

Dear Nevada County Board of Supervisors,

Ind 430-1

My name is Kate Gazzo. I am a resident of District 1 and live in Nevada City and work in Grass Valley for a nonprofit conservation organization. I have worked in environmental consulting, water quality, and natural resource mitigation for the past ten years since arriving in California. I have a M.S. degree in Environmental Management from the University of San Francisco.

Ind 430-2

In reviewing the DEIR, I found three major errors which need revision.
1. The Less Than Significant impacts conclusion on protected species and sensitive natural communities is unfounded and needs to be re-examined which I discuss further below.

Ind 430-3

2. The Hydrology study and Wolf Creek Technical Memo fail to present surface water quality data. Without baseline surface water quality data taken from South Fork Wolf Creek prior to the mine opening, there will be no data to compare changes in water quality once the mine begins operations. These data should be collected and disclosed to the public.

Ind 430-4

3. The DEIR lacks an economic evaluation of physical impacts posed by the Project from mining waste/spoils, noise, traffic, visual resources, water, and air pollution. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts, which the Project will.

Ind 430-5

My first comment is in response to the unfounded "Less than Significant" Impacts conclusion on sensitive natural communities and protected species. Increased flows and changes in the hydrology and hydroperiod of South Fork Wolf Creek will affect terrestrial, riparian and aquatic communities downstream. How much or how little water in a system impacts the vegetation communities that are present along the creek and therefore, what wildlife uses or does not use those areas. There are protected State and Federally-listed species with known occurrences just downstream of the Brunswick mine site, such as the Endangered Willow flycatcher bird, which relies on the riparian cover, primarily willows, along South Fork Wolf Creek. The willow

1

flycatcher and at least two other CESA-listed species have been documented two miles downstream of the Brunswick mine. The riparian band of vegetation along South Fork Wolf Creek will change in response to increased flows from mine dewatering. These impacts have not been analyzed or included in the DEIR. The geographic scope of the biological evaluations for vegetation and wildlife is too narrow and needs to be expanded to the creek corridor of South Fork Wolf Creek and its aquatic and biological communities which will be impacted by increased flows and changes in water chemistry from mine dewatering. Changes in water chemistry including specific conductivity, pH, turbidity and heavy mental contaminants will also affect biota directly downstream of the mine from benthic macroinvertebrates–the base of the food chain in South Fork Wolf Creek, to larger species such as brown trout which are present in the creek. These impacts are not evaluated and need to be included.

Ind 430-6

Regarding impacts on hydrology and water quality in South Fork Wolf Creek, there is no baseline surface water quality monitoring data presented in the DEIR, to make the determination that the Project will have Less than Significant Impacts.. Without baseline surface water quality data, we will not be able to track changes in constituents of concern such as turbidity or heavy metals over time to know if they are mine-related or were always present. Similarly, there is not an assessment on how the water levels and hydroperiod will change in South Fork Wolf Creek and how that will impact downstream habitats and wildlife. These need analysis.

Ind 430-7

My third comment about the DEIR is that the report lacks an economic evaluation. The economic impacts of a project are only subject to CEQA if those impacts cause physical impacts, which the Project will. There will be visual, noise, traffic, mining spoils/waste, and air and water quality impacts on the environment surrounding and downstream of the mine which will impact current residents, and future residents thinking about living in our community in addition to visitors considering coming to Grass Valley for recreation. The appearance of an operating mine as seen from the roadway, poor air quality, noise, traffic, and potential water contamination would likely deter numerous people from choosing to buy a home in the Grass Valley Area. The same argument can be said for visitors. Many would choose somewhere else to vacation that is not encumbered by pollution.This would impact business owners, realtors, and residents (home prices). Additionally, there is no evaluation of cleanup costs from surface mining spoils/waste, water, or air that citizens may be encumbered with. These economic impacts need analysis and inclusion in the DEIR.

2

Ind 430-8

Below I put together a simple table with some of the costs of opening the IMM mine paired with the benefits. This is a crude analysis and actual monetary values (an economic study) are needed in the DEIR which is something that is lacking.

Cost	Likelihood	Benefit	Likelihood
Fewer visitors and a less desirable place to live (home prices) stemming from air, traffic, noise, and water pollution impacts	Certain	Creation of local jobs (many may be outsourced)	Uncertain
Mining spoils cleanup and site reclamation. This could be taxpayers responsible for this if you consider the Track Record of Rise Gold Corp	Likely	No additional benefits	
Increased noise for local residents leading to residents leaving the area, and property prices decreasing	Certain	Economic stimulation from more workforce in the community	Certain
Local air quality impacts leading to acute and chronic health impacts for residents from dust and greenhouse gas particulate matter released during operations and trucking	Certain	No additional benefits	
Traffic flows and congestion	Certain	No additional benefits	
Water storage and security impacts to local groundwater table and nearby resident's wells	Certain	No additional benefits	
Surface water quality impacts (turbidity, iron, manganese, others) and impacts on aquatic life	Certain	No additional benefits	
Downstream hydrology impacts on habitats and wildlife along South Fork Wolf Creek	Likely	No additional benefits	

3

The Project garners very minimal benefit other than a few local jobs. Most people in our area do not have the technical expertise to dewater and operate a mine, therefore, very few local residents will likely obtain jobs from the IMM and most will be from other states. The few millions of dollars stemming from local job creation and local business spending severely underweighs the likely more than a billion dollars of losses in tourism, home prices, human health and environmental costs associated with opening this mine. Many of these impacts are irreversible impacts and ones that we can't simply "cleanup" such as the perception of our cities or contaminated water and sediment. There are so many other great business opportunities and needs of the Grass Valley community than a mine where all profits are going into the pockets of a corporation and only a small fraction back into the community.

Ind 420-9

I request that the Board of Supervisors thoroughly consider all the costs associated with this Project compared with the benefits which includes an economic evaluation to weigh the costs and benefits of the Project. I also recommend that the hydrology and water quality evaluation be revised to include background surface water quality samples from South Fork Wolf Creek. I request that the protected species and natural communities determination of "Less than Significant" be re-evaluated to encompass sensitive natural communities such as the Bennett Street Grasslands and CESA-protected species that occur in South Fork Wolf Creek directly downstream from the Project.

Sincerely,

Kate Gazzo, M.S.

4

INDIVIDUAL LETTER 430: KATE GAZZO

Response to Comment Ind 430-1

This comment is introductory in nature and does not address the adequacy of the DEIR. The comment is noted.

Response to Comment Ind 430-2

The commenter states the DEIR's conclusions needs to be reexamined. Responses to specific comments are provided below.

Response to Comment Ind 430-3

The commenter states that the Hydrology study and Wolf Creek Technical Memo fail to present surface water quality data. Contrary to the assertions in this comment, the DEIR contains voluminous baseline surface water quality data. The baseline surface water quality data are described in Section 3.4.1.2 and presented in Tables 3.5 through 3.10 of Appendix K.2 of the DEIR. The baseline data include results from samples collected from the underground workings, from drains that discharge water from the underground workings, from Wolf Creek, and from South Fork Wolf Creek. The results include field parameters, general water chemistry parameters, and metals. In particular, Table 3-8 of Appendix K.2 contains pH, temperature, dissolved oxygen (DO), electrical conductivity, and oxidation-reduction potential (ORP) measurements from three locations along South Fork Wolf Creek and two locations on the former SPI site that discharge to South Fork Wolf Creek. Table 3-8 of Appendix K.2 presents laboratory analytical results for 18 general water chemistry parameters and 19 different metals from two samples collected along South Fork Wolf Creek at locations that will be upstream and downstream of the proposed treated water discharge location.

Table 3-10 of Appendix K.2 provides field measurements of flow, temperature, specific conductance, pH, and turbidity for two locations (upstream and downstream) along South Fork Wolf Creek measured during five different storm flow conditions, including summer baseflow, early-season post-storm (comparable to first-flush) flows, winter baseflow, rising flows during a "qualifying rain event of 1.25 inches, and peak flows during the same "qualifying rain event". Additional details regarding flow conditions and baseline water quality conditions in South Fork Wolf Creek are also provided in Appendix K.1 of the DEIR.

Further, analysis of the baseline water quality data is provided in Section 3.4.2 of Appendix K.2 of the DEIR. In particular, data from South Fork Wolf Creek are presented on Figures 3-12 and 3-19, while the baseline data from the underground workings, drains, and Wolf Creek are presented on Figures 3-12 through 3-18.

Compliance with water quality standards, including parameters such as temperature, turbidity, pH, and dissolved oxygen, and also general chemistry and metals, will be based on comparison of the results from the upstream and downstream sample locations while treated water discharge to South Fork Wolf Creek is actually taking place, and not on current baseline conditions. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek and NPDES CAG99500 (provided below). While the baseline sampling that has been conducted for the project informs the analysis of potential impacts in the DEIR, it would not be relevant for future compliance once dewatering, water treatment, and discharge begin. The compliance sampling requirements would be defined in the Monitoring and Reporting Program for the NPDES permit to be issued by the Regional Water Quality Control Board.

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2022-0006_npdes.pdf

Response to Comment Ind 430-4

The commenter states that the DEIR must include an economic evaluation because the economic impacts of the project will lead to adverse physical changes but provides no evidence to substantiate this claim. CEQA provides that the economic and social impacts of a project are not to be treated as significant effects on the environment. (*Save Our Schools v. Barstow Unified School District Board of Education* (2015) 240 Cal. App. 4th 128, 146.) An economic or social change is to be considered only to the extent it will lead directly or indirectly to an adverse physical change. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App. 4th 1184.)

In *Bakersfield Citizens for Local Control v. City of Bakersfield*, the court described the phenomenon [urban decay] as "a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake." The court also discussed prior case law that addressed the potential for large retail projects to cause "physical deterioration of [a] downtown area" or "a general deterioration of [a] downtown area." (Id. at pp. 1206, 1207). When looking at the phenomenon of urban decay, it is also helpful to note economic impacts that do not constitute urban decay. For example, a vacant building is not urban decay, even if the building were to be vacant over a relatively long time. Similarly, in the context of retail development, even a number of empty storefronts would not constitute urban decay.

The commenter provides no evidence as to how the economic changes of the project will directly or indirectly lead to adverse physical changes akin to urban decay. The commenter is also referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 430-5

The commenter states that the DEIR is inadequate because increased flows to South Fork Wolf Creek will impact species downstream. The commenter also states that the geographic scope of the biological impacts along South Fork Wolf Creek must be expanded. The commenter is referred to Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, Master Response 33 - Groundwater Dependent Vegetation, Master Response 34 - Resident Fish, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 37 – Birds and Raptors. Please also see Response to Comment Grp 2-5, which demonstrates that the project would not affect vegetation adjacent to the creek or interrelated habitat.

Response to Comment Ind 430-6

The commenter reiterates the erroneous assertion that the DEIR contains no baseline date to evaluate the hydrology and water quality of South Fork Wolf Creek. The commenter is referred to Responses to Comments Ind 430-3 and 430-5.

Response to Comment Ind 430-7

The commenter reiterates the assertion that the project's economic impacts will cause adverse physical changes and thus must be considered by the DEIR. The commenter states that the project's physical impacts (e.g., aesthetics, traffic, noise) will adversely impact recreation or tourism and would deter would-be future residents from purchasing a home in the community. The commenter is describing potential economic impacts that may result from the project's

physical impacts. The commenter does not identify any physical impacts that would result from project's economic impacts. The commenter is referred to Response to Comment Ind 430-4, Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 430-8

The commenter states that the project's economic benefits to the community are outweighed by the project's environmental impacts. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 430-9

The commenter summarizes the concerns previously listed in the Letter. The commenter is referred to the Responses to Comments above.

Individual Letter 431

Ind 431-1

Ind 431-1


RISE GRASS VALLEY
THE SCIENCE IS CLEAR:
NO MINE!
Rise Grass Valley's Plan to Re-Open the Idaho-Maryland Mine is Safe and Responsible
No!



Rise Grass Valley strikes deal with Ophir Hill and Nevada County to bolster local fire protection.

In a major boost to local fire protection, Rise Grass Valley has committed to purchase a new, top-of-line fire engine to serve the Ophir Hill Fire Protection District and to fund three new full-time firefighter positions. Plus, Rise Grass Valley will pay for installation of a new water supply line along East Bennett that will provide fire hydrant access for the OHFPD. Rise's mine rescue team, with 24 members and five emergency technicians, will be available to OHFPD if needed. The Brunswick site may be used as a base for marshalling of fire resources – with 21 acres of unused area, a changing/shower facility and a backup power system – in the event of a local or regional fire emergency.



Over 600 new local jobs created. $50 million of new local annual spending in Nevada County.

I call BS

The mine would create an estimated 612 new local jobs comprised of 312 mine employees and 300 jobs induced by new local annual spending of ~$50 million per year.

Rise estimates workers will earn an average of $122,000 per year including benefits, that's more than double the county average. Local hiring and training programs are designed to **achieve the goal that 2/3 of our workers will be recruited from current residents in the area.** That's why we're investing so heavily in the Nevada County community – Nevada County residents will be the backbone of our team.

The project provides safe and satisfying careers with exceptional opportunity for skills and knowledge development.

Ind 431-2

INDIVIDUAL LETTER 431: KATE KANE

Response to Comment Ind 431-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment does not address the adequacy of the DEIR.

Response to Comment Ind 431-2

Please see Master Responses 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 432

From: Katharine Popenuk <popenuk@gmail.com>
Sent: Monday, April 4, 2022 4:30 PM
To: Idaho MMEIR
Subject: DEIR shortcomings-against mine reopening

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My name is Katharine Popenuk and I reside in Grandview Terrace.

I wish to address whether a specific business, the gold mining business, as opposed to any other business, is in the best interest of the citizens of Nevada County.

Ind 432-1

We are talking about the real and potential environmental impact of a heavy industrial hard rock mining operation. And we're talking about 80 years. 80 years of 24/7 mine operation, of listening to rumbling below our homes, the thunder of trucks carrying waste rock down our streets. 80 years of breathing microscopic asbestos dust, listening to the non stop crushing mill, driveing on destroyed roads, watching habitats disappear and our natural beauty fade.

Ind 432-2

Where in the DEIR do they say how this microscopic asbestos will be filtered out when even a N95 mask is ineffective? Where in the DEIR do they talk about repairs to public roadways ruined by non-stop truck traffic of tons of rock? Where does it address damage to our local highways when the dump sites are filled to capacity or when they find a buyer for the rock fill they will be creating?

Ind 432-3

These deeply buried rocks will be stored in a gigantic 37 acre pile, up to 70' high. They also contain naturally occurring sulfide.
When sulfide combines with rain sulfuric acid is created. Contaminating our groundwater. Where in the DEIR do they mention how they will stop this from happening?
Sulfuric acid will taint our most important water source.

Ind 432-4

What will be left of South Wolf Creek and Bennett Meadow after it is blasted every day for the first six months with 15 1/2 Grass Valley municipal swimming pools worth of water? Where in the DEIR do they discuss the potential flooding of Bennett meadow and the resultant killing of the native grasses, and habitat destruction to the many birds and other animals that live there?

Ind 432-5

Can we really expect our water table to NOT deplete when 1.6 million gallons of water are being pumped out each and every day? Do they have any better plans than those described in the DEIR than to pipe in water for only 7-30 potential wells gone dry?

Ind 432-6

Who will take responsibility when Mr. Mossman or whoever runs "Rise Gold" next, have long since left or declared bankruptcy?

We, the people, assume all the risk while others, with no interest in our quality of life, leave with all the gold.

1

No one can do whatever they want on their own land. All private property rights are subject to laws and codes. Our Board of Supervisors is responsible for ensuring those objectives are met and the community is protected.

I encourage each board member to consider your allegiance to the citizens you have been elected to protect.

Most Sincerely,
Katharine Popenuk
10728 Footwall Drive
Grass Valley, CA.
808 280-6921

--

Katharine Popenuk, Architect

• Phone 808 280-6921 • popenuk@gmail.com



INDIVIDUAL LETTER 432: KATHARINE POPENUK

Response to Comment Ind 432-1

The commenter is generally opposed to the project and cites a number of potential impacts including noise, traffic, air quality, damage to roads, and adverse impacts to habitat. The DEIR states that noise-related impacts will be less than significant after mitigation, with one exception – temporary construction noise. Specifically, the installation of a potable water pipeline along East Bennett Road will cause a temporary noise impact that is significant and unavoidable. (DEIR, p. 4.10-27, 31.) As noted on page 4.10-44 of the DEIR, using average blasting noise levels from a comparable underground gold mine, the worst-case maximum noise levels at the nearest noise-sensitive receptors would range from 52 to 57 dBA L_{max}. The range of predicted worst-case blasting noise levels of 52 to 57 dBA L_{max} is below the daytime, evening, and nighttime dBA L_{max} criteria at the nearest receptors. For clarification, there is no crushing mill, as envisioned by the commenter. Rather, the fully enclosed process plant building would include grinding equipment for mineralized rock. The noise study for the project evaluated the potential noise impacts from this grinding equipment (DEIR, p. 4.10-38). Based on the data, the mineral processing operations would generate noise levels below the applicable nighttime standards of significance at each of the nearest sensitive receptor locations. As such, noise-related impacts from mineral processing would be less than significant (DEIR, p. 4.10-38).

The DEIR states that air quality impacts would be less than significant after mitigation. (DEIR, p. 4.3-66.) The commenter is also referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. The DEIR states that any impacts to habitat would be less than significant after mitigation. (DEIR, p. 4.4-80.) Lastly, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

Response to Comment Ind 432-2

The commenter asks how asbestos will be filtered during project operations. Please see Response to Comment Grp 7-6.

Regarding the potential damage to pavement from project traffic, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 432-3

The commenter states that the engineered fill contains sulfide, which will produce sulfuric acid during a weather event and pollute groundwater. Please see Master Response 8 – Mine Waste Characterization. Based on the geology of the rock encountered in the core drilling at the project site, and testing of those samples, acid rock drainage is not expected. (DEIR p. 4.8-50.) Nonetheless, the DEIR has concluded that the project may have a potentially significant impact on water quality and has identified Mitigation Measures 4.8-1(d) and 4.8-1(e) to address these

potential impacts and reduce the impact to less than significant. The purpose of the Waste Discharge Requirement (WDR) from the Central Valley Regional Water Control Board is to ensure the effluent from mine waste does not impact water quality. Further testing will be required as part of the RoWD and WDR process as required by Mitigation Measures 4.8-1(d) and 4.8-1(e) such that any impacts will be mitigated. WDRs for the project will require monitoring and reporting to ensure compliance.

Response to Comment Ind 432-4

The commenter is concerned with the potential flooding of Bennett Meadow and biological impacts to species and habitat. The DEIR states that the project would not result in flooding on- or off-site and impacts would be less than significant after mitigation. (DEIR, p.4.8-69.) The commenter is also referred to Master Response 36 - Flows in South Fork Wolf Creek. The DEIR's drainage analysis concludes that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows. (DEIR, p. 4.8-75.) West Yost's independent peer review concurs with this conclusion. Regarding the impacts to habitat and species, the DEIR states that any impacts to habitat would be less than significant after mitigation. (DEIR, p. 4.4-80.) The commenter is also referred to Master Response 37 – Birds and Raptors, Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog, and Response to Comment Grp 2-5.

Response to Comment Ind 432-5

The commenter is concerned about the project's impact on groundwater supplies. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 432-6

This comment concerns the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 433

From: Katherine Plocharczyk <katherineplocharczyk@gmail.com>
Sent: Monday, April 4, 2022 12:19 PM
To: Idaho MMEIR
Subject: Comment on the Draft Environmental Impact Report

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County Planning Commissioners,

I am writing to let you know that I object to the proposed re-opening of the Idaho Maryland mine. I am a Nevada County resident, and I have been for seven years. I urge you to protect not only the natural beauty in Nevada County, but the quality of life for its residents.

Ind 433-1

There is little evidence that re-opening the mine will bring financial benefit to the community. Rise Gold, the company intending to re-open the mine, has never opened a mine and never made a profit. Their CEO, Benjamin Mossman's, last project went bankrupt, and resulted in a toxic spill that polluted tribal waters in British Columbia. The mine left a huge mess for Canadians to clean up.

Ind 433-2

The chances are unlikely that Rise Gold's new venture in Nevada County will be lucrative, and even so, such potential profits will be going directly to Rise Gold shareholders instead of the local community. There is the promise of creating jobs, but these appear few and far between. What we do know is that despite these few job gains, the mine will threaten both tourism and property values by diminishing the quality of life in Nevada Coutny.

Ind 433-3

While there is little evidence that the mine will benefit the local economy, there is an abundance of evidence that supports the claim that the mine will ultimately diminish quality of life in Nevada County. I have organized a few reasons below. The Idaho-Maryland mine will:

1. Produce Toxic Waste:
Hardrock mining is the number one source of toxic waste in the U.S. Nevada county should be very wary of introducing industrial mining into our community, without a clear plan for disposing of toxic waste. Rise Gold is already responsible for the Centennial Mine Site in Grass Valley, which they have failed to clean up, and with Benjamin Mossman's last venture as precedent, it seems unlikely that the waste produced by the Idaho-Maryland mine will see any other fate.

Ind 433-4

2. Diminish Air quality:
Continuous rock crushing, loading, hauling, unloading, spreading, and compacting also produces an abundance of dust, when the air quality in Nevada County is already worse than we would like. Nevada County already sees chronic lung disease deaths at twice the state average, and we can't afford to increase these numbers.

Ind 433-5

3. Drain our energy:
The mine requires massive energy usage, approximately 12% of what all Nevada County uses annually, which will strain our power grid. The county has already planned to cut residential power consumption in an effort to curb our carbon footprint, but the proposal of the mine renders such efforts futile.

Ind 433-6

4. Drain our water:

1

Not only will the mine drain our energy but it will swallow up our supply of precious water. The mine calls for 3.6 million gallons every day for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habitat, and putting private 300+ private wells at risk. In a drought, we cannot endanger our water supply in this manner. Water supply for private residences will be at risk, when they have already been threatened by the state drought.

Thank you for your time and for reading my comments.

All the best,
Katherine Plocharczyk
Nevada County Resident

INDIVIDUAL LETTER 433: KATHERIN PLOCHARCZYK

Response to Comment Ind 433-1
Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 433-2
Please see Master Response 2.

Response to Comment Ind 433-3
Please see Master Responses 3 and 4, as well as Master Responses 8 through 12 and the discussions and analyses in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 433-4
Please see Master Responses 18 through 23 regarding air quality.

Response to Comment Ind 433-5
Please see the analysis under Impact 4.3-4, which evaluates the proposed project's potential to result in inefficient or wasteful use of energy and starts on page 4.3-86 of the DEIR. Based on the incorporation of various measures, including the applicant's proposed APM-AQ-1 (Exhaust Emission Control) and Tier 4 engines as required by Mitigation Measure 4.3-1(b), the DEIR concludes that the proposed project would not result in an inefficient, wasteful, and unnecessary consumption of energy, and a less-than-significant impact would occur.

Response to Comment Ind 433-6
Please see Master Responses 13 through 16 regarding groundwater. The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 434

March 28, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Subject: Comments on Draft Environmental Impact Report, Idaho-Maryland Mine

Dear Mr. Kelley and the Board of Supervisors:

Ind 434-1

My name is Katherine Thompson and I am part of a 5-generation Nevada County family. I reside within a mile of the Idaho-Maryland mine mineral rights area. Also, I was with the U.S. Environmental Protection Agency Office of Inspector General for over a decade.

Concerns as a resident: As a resident, I am concerned about the significant impacts of this mining project not only to me, but also to my children and grandchildren, and my grandchildren's children. This is proposed as an 80-year project with significant impacts for generations.

Ind 434-2

Our house is near Gold Hill Drive and we can hear and see the school bus barn traffic on East Bennett Road, where Rise Gold proposes to have dozens and dozens of truckloads of waste trucked daily. We are about 3 blocks from the Grass Valley city limits; we have also heard and felt mine blasts. The trucking and blasting noise and resulting air pollution will adversely and directly impact the quality of life in my neighborhood.

My concerns are:

Ind 434-3

- Excessive traffic, noise, and air pollution from trucks hauling waste, supplies, and hazardous substances to and from the mine and from underground blasting.

Ind 434-4

- Dewatering the underground water supply, impacting not only wells but also the environment dependent upon the groundwater supply.

Ind 434-5

- High flows down South Wolf Creek and Wolf Creek, which passes by Hennessy School.

Ind 434-6

- Inadequately identified risks including seismic, climate change, and use of hazardous and toxic materials and practices.

1

Ind 434-7

- Insufficient hydrogeology investigations throughout the project area that could result in dewatering large portions of our underground water supply and adversely impact a large ecosystem.

Ind 434-8

- Vague identification of operations and risks in the entire project area, including the 2,585-acre mineral rights boundary that includes the Brunswick Basin.

The County public meeting on Thursday, March 24, 2022, identified many significant environmental impacts that were not identified, fully identified or mitigated.

Ind 434-9

Rise Gold's reputation and history as a non-compliant operator is a serious concern to me. As we know, it's the actions not the words that count. It doesn't take much research to see Rise Gold has a poor track record.

Given this history and the large population impacted, it is even more critical that the County have the authority, expertise, plans, and resources to effectively monitor this operation. Does the Nevada County have sufficient funds to monitor all significant aspects of this permit and operation? Will we, the taxpayers, be paying for additional staff or contractors for oversight and compliance? If the operator is not in compliance with its permit, how will Nevada County respond?

Ind 434-10

Minimally, permit compliance would involve discharge water sampling, mine waste discharge monitoring, air monitoring, noise monitoring, and safety inspections. What actions will be taken for violations? Will the mine be allowed to continue to operate with repeated violations? Under what conditions can the permit be revoked? Are we accepting Rise Gold's monitoring suggestions? Are they adequate to protect the community and the environment? The Rise Gold track record should clearly cause pause.

Ind 434-11

Concerns as a professional. As mentioned in my introduction, I was with the U.S. EPA Office of Inspector General for over a decade and spent many years evaluating the Superfund program, in addition to wastewater discharge permits. This included evaluations encompassing mine cleanups. A Superfund designation means that the owner has created a serious toxic or hazardous waste that endangers human health or the environment.

Based on my experience and knowledge:

- Mines are significant toxic polluters.

Ind 434-12

- Fully identifying mining site hydrogeology is very difficult but critical to understanding how mining operations impact groundwater, associated wells and drinking water, and the scope of the impact. There are multiples cases where unknowns in hydrogeology resulted in dewatering wells (e.g. San Juan Ridge Mine, https://yubariver.org/issues/the-san-juan-ridge-mine/) and extensive contamination of ground water and or surface water (e.g. Sacramento water supplies, Aerojet Superfund site, https://www.epa.gov/enforcement/case-summary-epa-issues-order-aerojet-general-corporation-superfund-site).

Ind 434-13

- Environmental impact reports often fail to consider the cumulative impacts of planned development, are too vague, and propose inadequate mitigation measures.

Ind 434-14

- Cleaning up significant pollution from mines is extremely expensive and some cleanups must continue in perpetuity at taxpayer expense.

Ind 434-15

- Companies declare bankruptcy to avoid paying for cleanups.

Ind 434-16

Mines are significant toxic polluters. According to Columbia Climate School, (December 2016), "**The EPA's Toxic Release Inventory indicates that that the metal mining industry is the nation's most significant toxic polluter, accounting for 40 percent of toxic releases in 2011 with chemicals such as arsenic, lead and mercury**. In 2013, the EPA's superfund budget was only about $775 million, but the agency had identified 156 mining sites with potential cleanup costs of up to $24 billion. As of Oct. 3, 2016, the EPA has identified over 1,000 sites as belonging to the National Priorities List, a collection of polluted sites warranting further investigation." No Federal funding means Nevada County taxpayers would likely be on the hook.

Ind 434-17

Congress passed the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) in 1980 because of the need to cleanup tremendous toxic and hazardous dumps that had been left behind. Initially there was a Superfund trust fund to cleanup these sites.

In 1995, the Trust funding was eliminated and EPA went to a 'polluter pays' approach that typically includes enforcement orders, negotiation, lawyers and litigation. (https://www.epa.gov/superfund/superfund-history).

According to the Sierra Club, the Centennial Industrial site, purchased by Rise Gold for the project, ranked as the top priority California abandoned

mine by the EPA, because proximity to communities and known contamination and physical hazards. "This site is 56 acres with two-thirds of the site covered with tailings from the Idaho-Maryland Mine, which operated until 1956. Though it was much quieter during the war and afterwards, in fact it then closed in the mid 50's. There is an estimated two hundred and seventy thousand cubic yards of legacy tailings which are toxic, which have to be removed in order to use the site for new dumping or placing new mine waste." (Barbara Rivenes, Sierra Club, October 2020. https://www.minewatchnc.org/post/centennial-site-needs-cleanup). It should be noted that this site has not been cleaned up or listed on the Superfund National Priorities List although full operations ceased in the mid-1950s.

Rise Gold plans to dump an additional 1 million cubic yards of mining waste as this site. (Rivenes, Sierra Club, October 2020). This area has a "severe" erosion hazard potential (DEIR page 4.6-35) and is subject to a cleanup plan.

Hard rock mining sites are frequently Superfund sites or candidates for Superfund. A 2004 report by the U.S. Environmental Protection Agency (EPA) Office of Inspector General (EPA 2004b) identified 63 hard rock mining sites (which do not include coal mining) listed on the National Priorities List (NPL), another 82 that were on Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) but had not yet been listed on the NPL, and 11 potential CERCLIS/NPL sites. (Source: National Academies of Sciences, Engineering, and Medicine. 2005. Superfund and Mining Megasites: Lessons from the Coeur d'Alene River Basin. Washington, DC: The National Academies Press. https://doi.org/10.17226/11359.)

In an article entitled, "Why Are Mines Still Polluting, the Money's Not There," the Columbia Climate School explained, "companies declaring bankruptcy or restructuring their corporate relationships have exploited the current assurance mechanisms to avoid cleanup costs."
(https://news.climate.columbia.edu/2016/12/20/why-are-mines-still-polluting-the-moneys-not-there/)

In 2019, the United States Court of Appeals for the District of Columbia Circuit upheld an Environmental Protection Agency decision not to instate its proposed rule that would have protected taxpayers from having to foot the bill for costly clean-ups of mining pollution. (Pacific Standard news report, July 2019.)

The Pacific Standard (7/22/19) noted that John Robison, the public lands director with the Idaho Conservation League said this decision highlights the

4

need for states and communities to take it upon themselves to ask tougher questions about mining and mine designs. "Communities can't rely on the EPA in protecting public health, safety, and taxpayers," Robison says.

In 2020, the University of British Columbia published research on the adequacy of environment assessments, such as EIRs, including those performed in California. It found these environmental impact reviews identified few to no environment impacts important enough to be "significant" for regulators. Of the various mining projects reviewed, only one in British Columbia adequately included a realistic timescale for the ongoing effects of acid mine drainage, which pollutes streams from mining activities.

Ind 434-18

According to the research, many of the reviews failed to consider the cumulative impacts that the development would add to other ongoing problems. "Building a mine in an area, for example, may present new challenges for wildlife already struggling in that area due other threats." (Wildlife Society, April 2020, https://wildlife.org/are-environmental-impact-assessments-short-on-science/).

The same research also found that many of the reviews failed to show an understanding of potential negative impacts. "Many [environmental] assessments are far too vague," the researcher said, adding that almost none of them included specifics about what wildlife population might be affected by a particular project or whether the effects on nearby wildlife may affect the larger population of a species.

The Idaho-Maryland DEIR is no exception. For example, the DEIR states it will operate in a 2,500-acre underground mineral rights area (DEIR page 2-1). But impacts of accessing these mineral rights (blasting and dewatering) in this area are missing or vague. To illustrate, in evaluating noise and vibration impacts (DEIR 4.10), tshe DEIR focuses around the area around the Brunswick and Centennial sites and one area in between (DEIR 4.10-4).

Ind 434-19

There is no discussion in 4-10 of blasting and dewatering throughout the mineral rights boundary area, to include the Brunswick Basin. What will be the extent, depth, and frequency of the blasting and dewatering? Also missing is the fact that hundreds of buildings (homes, apartment buildings, businesses) have been constructed above the mineral rights area since the 1950s, when mining last occurred.

5

Ind 434-20

Conclusion. Mines are high-risk toxic operations that cause serious damage, leaving toxic waste, dry wells, and both soil and water contamination. One cause is unknowns in complex hydrogeology. These unknowns have resulted in significant impacts like the loss of drinking water supplies and widespread contamination.

Moreover, recent research shows deficiencies in EIRs are common and this EIR is no exception. Unaddressed deficiencies and unidentified risks and operations in this EIR add to the likelihood the project will not operate as described. Nevada County is responsible for mine oversight, which if sufficient, would significantly add to County budget and burden taxpayers.

Nevada County has grown substantially in the last 70 years (since the last hard rock mining) and hundreds of structures and people now reside above the Idaho-Maryland mineral rights area where blasting and dewatering can and will likely occur. Are these structures and the people in them at risk? The DEIR does not inform us about this.

Ind 434-21

The stakes of this project are high. I believe Nevada County must reject the project based on significant risks to our quality of life (including air, water, and environment). If not, it must ask the really tough questions about this operation, get them answered, apply the necessary limits, enact mitigation, and fund stringent oversight of this operation.

This project has to potential to change the trajectory for Nevada County. Will it continue be a beautiful area that attracts and invites visitors, artists, events, outdoor recreation, entrepreneurs, and tech companies? Or will it become an industrial, noisy, polluted mining town with a poor quality of life? I vote for the first option.

Sincerely yours,

Katherine Thompson
10815 Footwall Drive
Grass Valley, CA 95945
916.835.1541
kathompson111@gmail.com

INDIVIDUAL LETTER 434: KATHERINE THOMPSON

Response to Comment Ind 434-1
This comment is introductory in nature. The comment is noted.

Response to Comment Ind 434-2
The commenter is concerned about project trucks travelling on East Bennett Road, noise and vibration impacts from mine blasts, and air pollution from trucks but does not state why the DEIR is inadequate regarding these impacts. The project does not propose any trucking on East Bennett Road. (DEIR, Figure 3-30.) No mine blasting has taken place at the project since the mines were closed in the 1950s. Noise and vibration impacts from the project are analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR and air quality impacts are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

Response to Comment Ind 434-3
The commenter is concerned about traffic, noise, air pollution from trucks, transport of hazardous substances, and underground blasting but does not state why the DEIR is inadequate regarding these impacts. Noise from trucks and underground blasting has been analyzed in DEIR Chapter 4.10 (Noise and Vibration) and was found to be less than significant after mitigation. Air emissions from trucks and other equipment was analyzed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and is less than significant after mitigation. Hazardous substances are analyzed in DEIR Chapter 4.7 (Hazards and Hazardous Materials). The commenter does not identify which “hazardous substances” they are referring to; thus, a specific response cannot be offered.

Response to Comment Ind 434-4
The commenter is concerned about the project’s impact to groundwater wells but does not state how the DEIR is inadequate in this regard. DEIR Chapter 4.8 (Hydrology and Water Quality) analyzed impacts to domestic wells and groundwater supply, which were determined to be less than significant after mitigation. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 434-5
The commenter is concerned about discharges to South Fork Wolf Creek. DEIR Chapter 4.8 (Hydrology and Water Quality) analyzed impacts related to flow in South Fork Wolf Creek and determined those impacts to be less than significant after mitigation. The commenter is also referred to Master Response 36 –Flows in South Fork Wolf Creek.

Response to Comment Ind 434-6
The commenter states that risks including seismic, climate change, and use of hazardous and toxic materials and practices are inadequately identified in the DEIR, but provides no further information or evidence. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), 4.6 (Geology, Soils, and Mineral Resources), 4.7 (Hazards and Hazardous Materials), and 4.8 (Hydrology and Water Quality) of the DEIR. Regarding climate change, please also refer to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 434-7
The commenter states that hydrology investigations in the DEIR are insufficient but provides no further information or evidence. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14

- Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 434-8

The commenter states that operations and risks for the project area is only vaguely identified in the DEIR but provides no further information or evidence. The commenter is referred to Chapter 4 of the DEIR and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 434-9

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 434-10

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 434-11

The commenter is concerned about the project potentially creating toxic mining waste. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 434-12

The commenter states that fully understanding mining site hydrogeology is very difficult but does not comment on the project or the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 434-13

The commenter states that EIRs often fail to consider cumulative impacts but does not comment on the project nor the adequacy of the DEIR. Cumulative impacts have been analyzed at the end of each technical chapter of the DEIR. The commenter is referred to Chapter 4 and Section 5.3 of the DEIR.

Response to Comment Ind 434-14

The commenter states that cleaning up mining sites can be expensive and can continue into perpetuity. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) and Appendix C of the DEIR. The commenter is also referred Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 434-15

The commenter states that mining companies declare bankruptcy to avoid paying for cleanups. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Appendix C (Reclamation Plan) of the DEIR and Master Response 3 - Operator Responsibility.

Response to Comment Ind 434-16

The commenter states that the metal mining industry is a significant toxic polluter. This comment does not concern the project nor the adequacy of the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 434-17

The commenter references the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 – Historical Mine Waste at Centennial Site.

Response to Comment Ind 434-18

The commenter states that the DEIR fails to consider cumulative impacts but provides no additional information. Cumulative impacts have been analyzed in DEIR Chapters 4 and 5.3. The commenter also states that the DEIR understates the project's impacts because the project areas analyzed are the Brunswick and Centennial Industrial Sites, but the mineral rights area consists of 2,500 acres. The commenter is referred to Master Response 7 - Location of Future Mining Areas. The commenter also states that environmental review, such as this DEIR, frequently understates the impacts of the mining waste. The commenter is referred to Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 434-19

The commenter states that there is no discussion of blasting or dewatering throughout the mineral rights boundary area. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix M of the DEIR and Master Response 7 - Location of Future Mining Areas. Regarding the groundwater impacts from dewatering, the commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter also states, in relation to blasting, that numerous structures have been built on the surface since the Idaho-Maryland Mine was last active. Impacts to structures and residents from blasting vibrations has been analyzed in the DEIR. Impacts from blasting vibrations are less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) and Appendix M of the DEIR and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 434-20

The commenter summarizes their previous concerns. Please see the above responses.

Response to Comment Ind 434-21

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Individual Letter 435

From: Kathleen Fenton <kathleenaddress@gmail.com>
Sent: Friday, April 1, 2022 11:04 PM
To: Planning
Subject: comment for Planning Commission on IMM Project

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Dear Planning Commissioners,

Ind 435-1 You are in the enviable position of being able to actually do something to significantly protect the environment and quality of life here. You are charged with this responsibility and have the public trust, the trust of your community. Please do not let us down by approving the egregious Idaho-Maryland mine project.

Kathleen Fenton
530 277-9460

INDIVIDUAL LETTER 435: KATHLEEN FENTON

Response to Comment Ind 435-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 436

RISE GRASS VALLEY

Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-3 P2 104**********ECRLOT**B002
Kathleen Eugenia Madeira
PO Box 187
Grass Valley, CA 95945-0187

PAID
TMG

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.



Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

No More

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

Ind 436-1

INDIVIDUAL LETTER 436: KATHLEEN MADEIRA

Response to Comment Ind 436-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 437

From: Kathleen Madeira
To: BOS Public Comment
Subject: Rise Gold
Date: Monday, February 28, 2022 10:49:14 AM

Dist 3

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Katharine Popenuk shared a link.
t48f104c9fph10fgn1sao1reh ·

This opinion piece was in the Union today. Unfortunately, they did not print the most up to date version, which is below.

Science is clear but Rise Gold's most recent mailing is anything but. Rather, it is an intentionally misleading attempt to skew the facts regarding the mine reopening.

Ind 437-1

Has the mine reopening been approved?

No, Nevada County has NOT just completed anything regarding approval of the mine reopening. The county Board of Supervisors has yet to conduct its first meeting to discuss the contents of the draft environmental study. They have not yet fully considered nor approved the contents of the study. No final determination has been made as to the accuracy of the scientific analysis, anticipated impacts, or adequacy of the proposed regulation of a reopened mine.

Ind 437-2

The DEIR (DRAFT Environmental Impact Report) has not laid to rest anything. Rather, the report enumerates 83 impacts, 32 of which are considered significant enough that they will require some measure of intervention so as to make them not as bad as they actually are anticipated to be. Some impacts are so severe, there is nothing that can be done, we will just have to live with them. We are being asked to accept a lower quality of life in Grass Valley.

Ind 437-3

None of these concerns have been "put to rest". There remains grave concerns about drained wells, spoiled aquifers, polluted water ways, destroyed habitats, dust, exhaust, noise, and airborne chemicals associated with the transportation of waste and by gold extraction. There is no confirmation that there will not be spills, seepage, accidents, oversight, or callous disregard of regulations or safety practices.

Ind 437-4

What is the DEIR?

The DEIR's only purpose is to lay out the ways in which the reopened mine will impact our

environment and the possible ways some of these impacts could be dealt with. This report was compiled for and paid for by Rise Gold. It is important to note that this report was limited by and relied exclusively on information provided to the consulting firm by Rise Gold, and many of the conclusions reached in the report are based on assumptions and best case scenarios. The report does not guarantee in any way what will be the actual outcome. The fact remains, the mining industry is the single largest source of toxic waste and one of the most destructive industries in the country. Today's industrial mining involves the blasting, deep excavating, and crushing of acres of land and the use of huge quantities of toxic chemicals such as cyanide and sulfuric acid.

But what about the new jobs?

Ind 437-5

Rise Gold states we can expect 612 new jobs, 312 of which are directly related to the mine operation. The other 300 are presumed to be increases in our current employment base, in response to the estimated 50 million new dollars being poured into our community. Two thirds of the 312 mine employees are to be current local residents. The remaining 104 employees, would be the top paid technical and managerial positions. Are any of these highly trained specialized employees already a part of our local community? Or will these positions more likely be outsourced? Will adding 104 new Grass Valley residents really induce a new local spending increase of $50M each year?

Do mine workers really earn $122,000 a year?

Ind 437-6

When Rise Gold says "average", they are including all salaries, including the top 1/3 salaried positions in the calculation of that average. This includes the CEO's anticipated very generous salary. Furthermore, Rise Gold's estimated worker earnings includes company-paid benefit costs that the employee never sees in their paycheck. The reality is an entry-level Miner can expect to earn an average total compensation (includes bonus and overtime pay) of $18.55/hour, based on a survey of typical existing salaries. An early career Miner earns $20.26, and an experienced Miner with 10-19 years of experience earns $27.56. (source: payscale.com). Truck drivers, janitors, front load operators, security staff, etc. will all be making the current going rate, with or without a mine.

Ind 437-7

Do we get to keep the gold? No, we don't. All of the gold and all of the profits will be leaving Grass Valley. The city of Grass Valley and Nevada County will not be receiving a piece of the gold pie. Any profits will go to the owners and shareholders of Rise Gold.

So what's in it for us?

Ind 437-8

That is a very good question. Grass Valley assumes all of the risks, and for what? It's a case of trading the family cow for a handful of magic beans. We would be risking so much for so very little; throwing away our beautiful quiet community, our neighbors, our scenery, our streams and rivers, our air quality, our water quality and habitat, our well paved traffic free streets, our peace and quiet, and our tax dollars for mitigation and reparation—24/7 for the next 80 years; for what?

INDIVIDUAL LETTER 437: KATHLEEN MADEIRA

Response to Comment Ind 437-1
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 437-2
The commenter generally summarizes the number of impacts analyzed in the DEIR, but does not address the adequacy. See Master Responses 1 and 2.

Response to Comment Ind 437-3
The commenter expresses general concerns regarding the impacts of the project but does not specially address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 437-4
The DEIR has been prepared by a consultant hired and directed by the County. All technical reports used in the DEIR that were prepared by the Project Applicant have been independently peer reviewed by third party consultants hired by the County.

Response to Comment Ind 437-5
Please see Master Response 2.

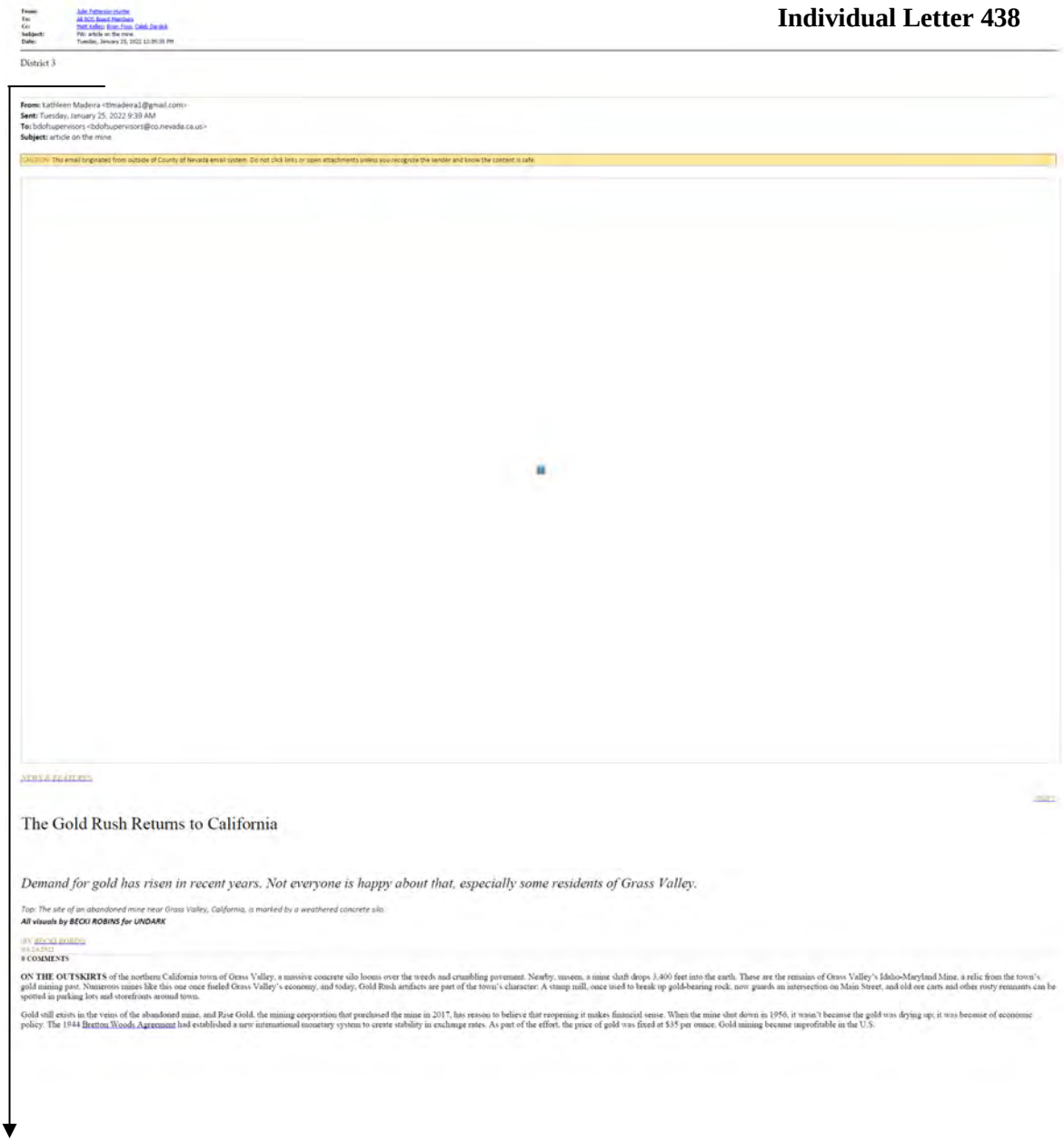
Response to Comment Ind 437-6
Please see Master Response 2.

Response to Comment Ind 437-7
Please see Master Responses 1 and 2.

Response to Comment Ind 437-8
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 438

Ind 438-1



From: Julie Patterson-Hunter
To: All BOS Board Members
Cc: Matt Kelley; Brian Foss; Caleb Dardick
Subject: FW: article on the mine
Date: Tuesday, January 25, 2022 12:35:35 PM

District 3

From: Kathleen Madeira <tlmadeira1@gmail.com>
Sent: Tuesday, January 25, 2022 9:39 AM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: article on the mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

NEWS & FEATURES

The Gold Rush Returns to California

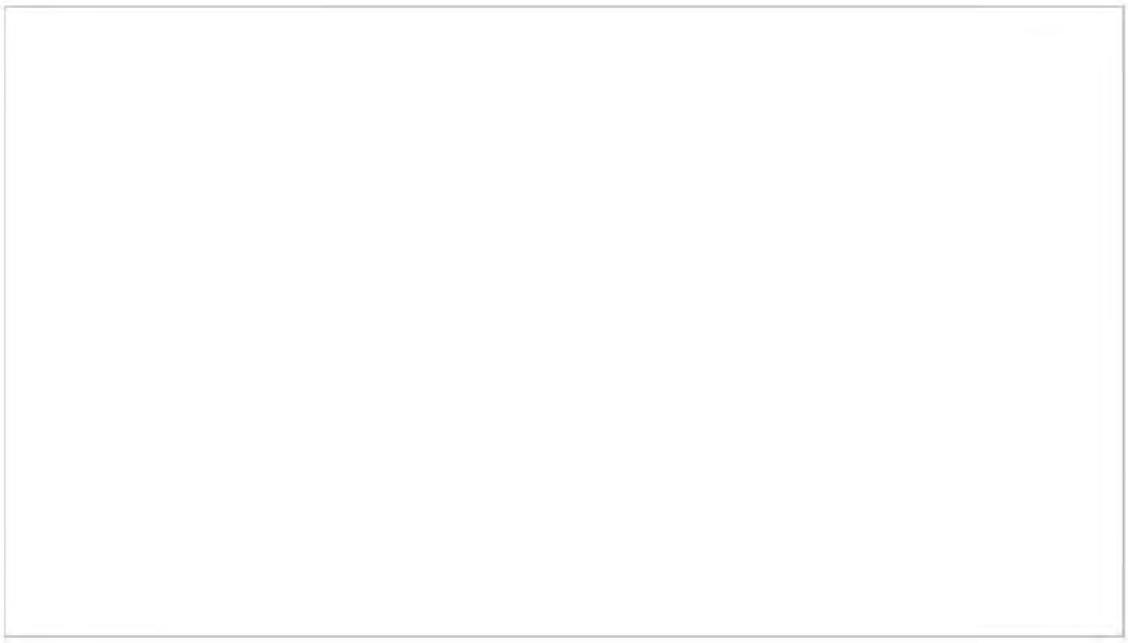
Demand for gold has risen in recent years. Not everyone is happy about that, especially some residents of Grass Valley.

Top: The site of an abandoned mine near Grass Valley, California, is marked by a weathered concrete silo.
All visuals by BECKI ROBINS for UNDARK

BY BECKI ROBINS
08.24.2022
8 COMMENTS

ON THE OUTSKIRTS of the northern California town of Grass Valley, a massive concrete silo looms over the weeds and crumbling pavement. Nearby, unseen, a mine shaft drops 3,400 feet into the earth. These are the remains of Grass Valley's Idaho-Maryland Mine, a relic from the town's gold mining past. Numerous mines like this one once fueled Grass Valley's economy, and today, Gold Rush artifacts are part of the town's character. A stamp mill, once used to break up gold-bearing rock, now guards an intersection on Main Street, and old ore carts and other rusty remnants can be spotted in parking lots and storefronts around town.

Gold still exists in the veins of the abandoned mine, and Rise Gold, the mining corporation that purchased the mine in 2017, has reason to believe that reopening it makes financial sense. When the mine shut down in 1956, it wasn't because the gold was drying up; it was because of economic policy. The 1944 Bretton Woods Agreement had established a new international monetary system to create stability in exchange rates. As part of the effort, the price of gold was fixed at $35 per ounce. Gold mining became unprofitable in the U.S.



RELATED

The Chinchillas and the Gold Mine

Today, the price of gold is no longer fixed, and prices have risen in response to the economic uncertainty wrought by Covid-19. At the start of the pandemic, the Federal Reserve lowered interest rates in an effort to stimulate

the U.S. economy and encourage borrowing money. But those record-low rates decreased the returns on bonds and savings accounts, making gold a relatively more attractive business investment.

Now, with inflation rising and renewed economic uncertainty over the omicron variant of the coronavirus, demand for gold remains high, even despite some recent [illegible]. In 2020, roughly 43 percent of gold consumed globally went towards exchange-traded funds and central banks. As prices have risen and mining technology has become more sophisticated, mines are opening and reopening in places where mining was once thought economically unfeasible.

Still, mining isn't as simple as it used to be. The U.S. Geological Survey estimates that of the world's known gold, roughly 63,000 tons are still in the ground, compared with roughly 206,000 tons that have already been mined. And the world's unmined gold is generally only unmined because it's deeper underground and thus less accessible. To obtain it, companies have to figure out what to do with huge amounts of mining waste, some of which contains heavy metals and other toxic substances.

Rise Gold has pledged to mitigate the environmental impact of its new mining operation in part by employing a technique called paste backfilling, which involves injecting a mixture of water, mine waste, and a binder (often cement) into mining tunnels. The practice helps provide structural support and reduce the amount of aboveground mine waste. There is some science to support the benefits of this approach, but it's only a partial solution, and there are lingering uncertainties about its long-term impact. While Rise Gold reports that there is strong support for the project throughout Nevada County, where Grass Valley is located, some local residents remain skeptical. Among other things, they are concerned that the new mining operation will not be able to adequately contain its waste.

Given these challenges, some economists are asking whether it makes sense to mine gold when the precious mineral is merely destined for a bank vault. "The cost of mining is high," says financial economist Dirk Baur. Much of the value of gold is tied up in the cost of just digging it out of the ground, he says. "There's some profit for the mining company, but a big, big chunk is just an expense."

OVER THE PAST couple of decades, proposals to develop or expand gold mining facilities have popped up across Europe and North America. In Northern Ireland, Dalradian Gold plans to open a mine in the Sperrin Mountains. In Newfoundland, Macathon Gold is slated to open an open-pit mine that the company says will be the largest gold mining operation in Atlantic Canada. In the United States, which, as of 2020, had the fourth-largest gold mine reserves in the world, mining operations have expanded in northwestern Arizona in recent years, and there are plans to reopen a mine in central Idaho. Many companies seeking to find new riches in old places face community pushback similar to what is happening in Grass Valley.

Gold mine opponents have good reason to be wary. Mining creates a lot of waste, including the rock that doesn't contain enough gold to extract (called "waste rock") and also the slurry left over after gold has been extracted from ore (called "tailings"). Both waste rock and tailings can contain toxic substances that threaten to pollute groundwater and surface waters if not properly mitigated.

Grass Valley has been dealing with the fallout of Gold Rush-era mining for decades. Arsenic, which occurs naturally in the gold deposits of the Sierra Nevada foothills, remains an ongoing problem in the area. Old tailings can still leach heavy metals decades after mining operations have ceased. In Grass Valley, the Central Valley Regional Water Quality Control Board documented high concentrations of arsenic in a pile of tailings nicknamed "the Red Dirt Pile." In 2020, high concentrations of lead, mercury, and arsenic were found in samples taken from a former mine waste disposal area that now supports approximately 4.5 acres of wetland habitat. That disposal area, known as the Centennial site, is owned by a subsidiary of Rise Gold called Rise Grass Valley.

The Centennial site was polluted enough to warrant consideration for listing as a federal Superfund site, but Rise Gold avoided federal regulation by agreeing to undertake its own cleanup. Ralph Silberstein, president of the Community Environmental Advocates Foundation, a local environmental organization, says his group welcomes Rise Gold's plans to address the hazardous substances that currently mar the area. But, he says, the group is troubled by what might come next. According to Rise Grass Valley's Remedial Action Plan, the company may take the freshly cleaned-up site and use it for dumping waste from "future mining operations," though they'll first have to get permission from the state.

Equipment labeled "Rise Gold Corp" sits at the Centennial site. The area now supports 4.5 acres of wetland habitat and was considered for listing as a federal Superfund site.

Rise Gold's plans to minimize the mine's impact are outlined in a draft environmental report, which Nevada County released this month, and which the company describes as "favorable." In an interview with Undark, Rise Gold's CEO, Ben Mossman, defended his company's plan to use the Centennial site for some of the waste produced in conjunction with the reopening of Grass Valley's Idaho-Maryland Mine. This particular mine is unique, said Mossman, because the company found "very little metal content" in the areas where it plans to dig. Because the waste will largely consist of non-toxic materials such as sand and rock, he says, "there's no geochemical concerns to the environment or human health" — a claim that activists question.

Even when rock has little or no heavy metals, disposing of it can be a significant challenge. According to Rise Gold's website, the Idaho-Maryland mining operation historically had to remove a ton of rock for every half ounce of gold it recovered. "These mining companies come along and they want us to not notice that they're going to have a huge amount of mine waste rock," says Elizabeth Martin, who recently retired as CEO of the Sierra Fund, a local conservation group based in nearby Nevada City. Rise Gold's draft environmental impact report says the plan will result in approximately 182,500 tons of material produced per year that will need to be transported then used as engineered fill. By comparison, a large dump truck can carry about 14 tons. Multiply that by more than 10,000, and the visual is "beyond most people's imagination," says Martin.

RISE GOLD PLANS to reduce its aboveground footprint at the Grass Valley mine with cemented paste backfill, which was first used in the 1970s as a way to recycle mine materials and help stabilize the underground workings. In essence, the mine becomes safer and the waste goes back to where it came from.

Paste backfilling is widely regarded as a more environmentally friendly way to dispose of mine waste. There is evidence that locking tailings up in cement decreases their permeability and stabilizes any heavy metals within them. There are still questions, though, about whether or not arsenic and heavy metals will stay put in the paste backfill material over the long term. The leaching behavior of arsenic depends on a lot of different factors, including the binder used in the backfill and the chemical content of the tailings. The biggest unknown is what happens in the future, when the mine closes and the pumps shut down, which will let groundwater flow into the backfilled tunnels. Some studies have noted that even low levels of leaching could continue for years, potentially contaminating drinking water or nearby rivers and streams.

> *"These mining companies come along and they want us to not notice that they're going to have a huge amount of mine waste rock," says Martin.*

Heavy metal leaching is high on the list of concerns in Grass Valley. Rise Gold promises their operations will be clean, but even so, the company's hydrology report does note arsenic leaching from some test samples. The leaching tests, meant to simulate what might happen to a waste rock pile when it rains, found that arsenic leached at concentrations 17 times greater than the water quality standards from samples of the mineral type serpentinite. Rise says that's not a concern since there will be very little serpentinite in the waste rock. Its report also notes that tests on tailings indicated arsenic leaching, but only at concentrations that would not exceed regulatory limits.

Underground mining operations also intersect with the water table, which means the existing tunnels have to be dewatered, and the water that's pumped out of the tunnels has to be treated before it's released aboveground. "The water coming from these mines that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says biologist Josie Crawford, executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever."

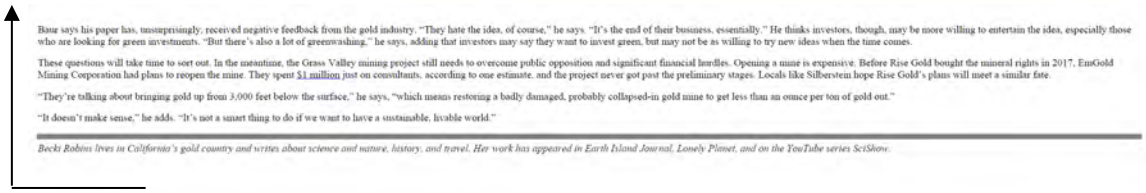
The water also has to go somewhere after it's been treated. Rise Gold plans to flush it down nearby South Fork Wolf Creek, a move that Crawford fears could cause damage to the riparian habitat. "It's a trout stream, so it's sensitive," she says. "If the dewatering starts scouring the creek, they could lose a lot of those invertebrates and ruin the trout habitat."

CONSERVATIONISTS AND community opposition groups often see gold mining as a battle between nature and greed, and question whether the pursuit of gold is really worth so much environmental destruction. So does Baur, the financial economist, who says it makes sense from both an environmental and economic perspective to just not mine for gold at all. Much of the gold that already exists above ground, he says, is held by banks and investment companies. Investors can buy shares of gold they've never even seen. Baur says they might as well just buy shares of gold that companies promise to leave in the ground. "You buy something that doesn't disrupt the land as much," he says, "and you don't have all the negative effects of the actual gold mining."

Baur recently explored this idea with a couple of his colleagues at the University of Western Australia Business School. In a 2021 paper, they proposed leaving unmined gold in the ground and letting "nature act as a natural vault and custodian legally protected by gold firms and the government." In this scenario, investors could buy stock in gold exploration companies that have identified underground gold but have no plans to mine it. This would give investors an alternative to purchasing shares of the aboveground gold that currently sits in bank vaults around the globe.

Would the unmined gold, which the paper calls "green gold," actually earn money for its investors? Baur and his coauthors considered the costs of gold exploration and gold mining, and the uncertainty of the quality and amount of gold that might exist in any given underground location. They then ran an empirical analysis, and concluded that unmined gold can still be a valuable investment.

A sign in the East Bennett neighborhood of Grass Valley reads "NO MINE." Several community groups in the area, concerned about heavy metal pollution and the vast amount of waste rock, are opposed to the mining project.



Baur says his paper has, unsurprisingly, received negative feedback from the gold industry. "They hate the idea, of course," he says. "It's the end of their business, essentially." He thinks investors, though, may be more willing to entertain the idea, especially those who are looking for green investments. "But there's also a lot of greenwashing," he says, adding that investors may say they want to invest green, but may not be as willing to try new ideas when the time comes.

These questions will take time to sort out. In the meantime, the Grass Valley mining project still needs to overcome public opposition and significant financial hurdles. Opening a mine is expensive. Before Rise Gold bought the mineral rights in 2017, EmGold Mining Corporation had plans to reopen the mine. They spent $1 million just on consultants, according to one estimate, and the project never got past the preliminary stages. Locals like Silberstein hope Rise Gold's plans will meet a similar fate.

"They're talking about bringing gold up from 3,000 feet below the surface," he says, "which means restoring a badly damaged, probably collapsed-in gold mine to get less than an ounce per ton of gold out."

"It doesn't make sense," he adds. "It's not a smart thing to do if we want to have a sustainable, livable world."

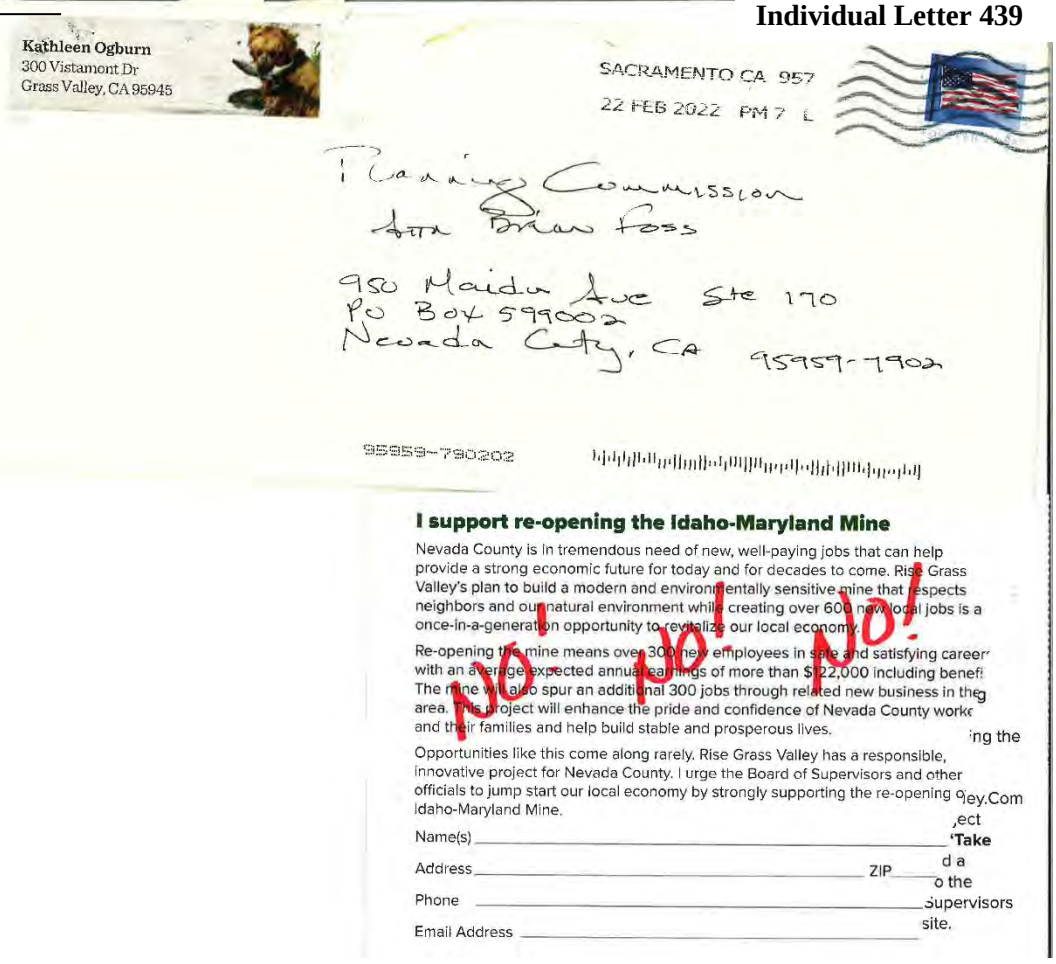
Becki Robins lives in California's gold country and writes about science and nature, history, and travel. Her work has appeared in Earth Island Journal, Lonely Planet, and on the YouTube series SciShow.

INDIVIDUAL LETTER 438: KATHLEEN MADEIRA

Response to Comment Ind 438-1

The comment provides an article written about the proposed project, but does not address the adequacy of the DEIR. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 439



Kathleen Ogburn
300 Vistamont Dr
Grass Valley, CA 95945

SACRAMENTO CA 957
22 FEB 2022 PM 7 L

Planning Commission
Attn Brian Foss

950 Maidu Ave Ste 170
PO Box 599002
Nevada City, CA 95959-7902

95959-79020

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying career with an average expected annual earnings of more than $122,000 including benefi The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County worke and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other officials to jump start our local economy by strongly supporting the re-opening Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

NO! NO! NO!

Ind 439-1

INDIVIDUAL LETTER 439: KATHLEEN OGBURN

Response to Comment Ind 439-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 440



January 31, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Re: Idaho-Maryland Mine Environmental Impact Report Study Comments

Dear Mr. Kelly:

Ind 440-1 This correspondence is in reference to the letter sent allowing the public to provide comments on the Idaho-Maryland Mine Project EIR. I strongly disagree in allowing anyone to reopen the Idaho-Maryland Mine, or any other mine in or near Nevada County. There is no guarantee the problems that can occur due to the opening of the mine will not happen, regardless of the speculative content of the Environmental Impact report. What I see is a lot of rhetoric stating the pollution will not occur for various reasons. I do not see any proof of these words. Where is the example of a clean slate of pollutants after reopening a similar mine? What happened to the water wells in the San Juan Ridge area of Nevada County when mine activity occurred in the past?

Ind 440-2 What I don't understand is why Nevada County continues to entertain the idea of reopening mines in the county? There are far too many people in Grass Valley to consider that any mine activity would not grossly interfere with human health, air quality, water quality, noise abatement restrictions, traffic problems, environmental disruptions and road quality problems, etc. Mining within a city is not conducive to a healthy living environment, particularly when Grass Valley has changed considerably since mining originated. This is no longer a city that is developing because a gold mine is in existence. It is a resort-like town that attracts people because of it's history and it has remained somewhat quaint due to restoring the old buildings and touting the days of yesteryear. The emphasis has been on cleaning up the environment and finding ways to keep pollution and big box stores at bay. It has taken years for all the previous mine work damage to subside. We have enough problems keeping things green and environmentally safe due to climate change and fossil fuel problems. Why would we want to take the chance the previously known environmental problems discussed in the EIR may come to the forefront? This city also has a large number of retired people. These are senior citizens who came here to live out their older years by taking advantage of the clean mountain air, beautiful landscapes and solitude. Many of these people, including my husband who has C.O.P.D./emphysema, have medical issues that would be greatly impaired with any chance of air or environmental quality issues due to reopening the Idaho-Maryland Mine. What a sad state of affairs to create problems for the very people who have helped keep this city alive.

Ind 440-3 Even if the anti-pollution efforts in the EIR were found to be correct and not a problem, there is still the issue of a constant stream of dump trucks creating traffic, fumes, noise road destruction and the possible sparking of a fire due to our drought conditions. Water is so scarce in California, it is a poor idea to take the slightest chance that chemicals or

Ind 440-4

Page 2

any particulates not natural to everyday life be introduced to our rivers and streams. We don't want to worry about becoming a victim of anything similar to Flint, Michigan. Air quality is already a problem world wide The particulates are so microscopic it may take years to realize the damage to humans, plants and animals is occurring until it is too late to reverse the problem.

Ind 440-5

Do we really want to take the risk that all the problems the mine reopening could create will actually occur? Is it worth lining the pockets of people from a foreign country, by polluting our small town? I find it unlikely we will solve any employment problems from the reopening of the mine. Many of the jobs require highly qualified personnel. We can't refill the basic jobs from the pre-pandemic times, do you think the labor intensive jobs will be highly sought after? The unskilled jobs will continue to be filled from the poor, less educated, or undocumented people from other cities, states and countries. I predict a very small percentage of local people will gain employment from the reopening of the mine. Once the unskilled workers realize the work is unsavory, the workers will find other ways to make a living. Current residents are not looking for menial, hard labor positions, at least not as a long term job. The pandemic has proven the jobs people prefer are remote, computer oriented jobs.

Ind 440-6

There are no redeeming qualities in opening the Idaho-Maryland Mine or any other mine. If tax revenue is the advantage, it is a poor trade off for making sweeping changes to the city of Grass Valley, creating problems for the current residents of the area. Is the dollar so important that the very people who live in this area may suffer poor health and a polluted environment?

Ind 440-7

My only hope is that the Nevada County Board of Supervisors will think long and hard on voting in favor of the reopening of the Idaho-Maryland Mine. It is hard for me to believe the people who live in this county and have followed the news stories about the mine truly understand the problems that could and will arise due to reopening of this or any mine in our community. If we need revenue let's find a less disruptive method. I'm certain we could do some fund raisers or other ways of gaining funds.

Ind 440-8

Thank you for the opportunity to voice my opinion. I do hope you will consider what I have voiced as pertinent and valid. This is truly a life changing situation for me and for many people in Grass Valley. I would definitely need to make a major change in my retirement location if this mine were to be reopened. It would be extremely difficult and of great consternation.

Sincerely,

Kathleen Woodson

Kathleen Woodson
Retired Grass Valley Resident
11547 Brunswick Pines Road
Grass Valley, CA 95945

INDIVIDUAL LETTER 440: KATHLEEN WOODSON

Response to Comment Ind 440-1
Please see Master Responses 1 and 2.

Pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. As part of such assessment, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent peer review. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is not speculative. The analysis in the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Response to Comment Ind 440-2
Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 440-3
Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Air Quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy of the DEIR.

Response to Comment Ind 440-4
Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts if the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 440-5
Please see Master Response 2.

Response to Comment Ind 440-6
Please see Master Responses 1 and 2.

Response to Comment Ind 440-7
Please see Master Responses 1 and 2.

Response to Comment Ind 440-8
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 441

April 2, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley

Please include these comments to the Idaho-Maryland Mine DEIR:

Sierra Streams Institute, a regional watershed science organization located in Nevada City, initiated a project in 2014 entitled, "Community Health Impacts from Mining Exposure, or CHIME." This project was a response to concerned Nevada County residents who asked Sierra Streams to investigate if there was any connection between Nevada County's high breast cancer rate and heavy metals from historical mining still present in the environment. The project was guided by a group of local community members called the community advisory board of whom I was member. *(https://sierrastreamsinstitute.org/research/)*

Ind 441-1

The CHIME study was funded by state tobacco taxes through the California Breast Cancer Research Program. It investigated the concentrations of heavy metals, like cadmium and arsenic, in a group of approximately 100 Nevada County women. It not only found interesting links between body burden (the total amount of a particular chemical present in a human's body) and the amount of time living in the area, but was also able to educate the community about the health hazards of heavy metal exposure. The second phase of the study focused on the amount of cadmium and arsenic in the bodies of women with and without breast cancer residing in historical Gold Country.

These two metals are of interest because they are found at high levels throughout the Gold Country, are known carcinogens and may play a role in developing breast cancer. The three most populous counties in the Gold Country, including Nevada County, have breast cancer rates that rank in the top ten counties in California. *(http://cancer-rates.info/ca/)*

According to the DEIR:

"Blasting and crushing would also result in emissions of dust with trace heavy metals TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium and vanadium. Concentrations of each heavy metal within the barren rock and mineralized rock was taken from Table 4-7 of the *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project* (EMKO Environmentoal, Inc. 2020)"

The DEIR fails to respond adequately to how it would mitigate the issue of contaminated soil and dust. This is of great concern given that the CHIME study has already shown that there is an increase in the risk of cancer in our community due to this exposure. We are currently dealing with one of the highest rates of breast cancer in California.

Ind 441-2

Why would we want to add to the toxic burden that our county is already experiencing?

Thank you,

Kathryn Eldredge
16862 Pasquale Rd.
Nevada City CA 95959
kateldredge2904@gmail.com

INDIVIDUAL LETTER 441: KATHRYN ELDREDGE

Response to Comment Ind 441-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 441-2

Please see Master Responses 12 and 18 through 23. In addition, please see the analysis under Impact 4.3-2, which evaluates potential impacts related to exposure of sensitive receptors to substantial pollutant concentrations, starts on page 4.3-78 of the DEIR, and includes a health risk assessment, the results of which are summarized in Table 4.3-21 on page 4.3-80 of the DEIR. As part of the analysis, the DEIR assesses potential dust impacts. Because the potential impact is concluded to be significant without mitigation, the DEIR sets forth Mitigation Measure 4.3-2 to ensure project consistency with the CARB Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying and Surface Mining Operations by requiring preparation and implementation of an Asbestos Dust Mitigation Plan (ADMP). With implementation of Mitigation Measure 4.3-2, the DEIR concludes a less-than-significant impact would occur.

Individual Letter 442

From: Katrina Christenson <katrinamariechristenson@gmail.com>
Sent: Monday, April 4, 2022 12:45 PM
To: bdofsupervisors; Idaho MMEIR
Subject: Idaho-Maryland Mine Project NO!

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 442-1

I Katrina, reside in Nevada County and am opposed to the Mine. This project would cause major depletion of groundwater reserves with plans to pump millions of gallons a day, contaminate local wells which we are still dealing with the repercussions from. The Nisenan people have not been consulted, there will be nice pollution from trucks right in the middle of quiet neighborhoods. The people who live here do not want to contaminate this precious land and water systems to create a few jobs and have a mess to clean up later. Water is a precious commodity and also this will likely crush tourism which brings money into our town. This wouldn't just effect our town, but surrounding communities as well. Listen to the people who live here and not money hungry corporations. Put efforts into clean energy deals.

INDIVIDUAL LETTER 442: KATRINA CHRISTENSON

Response to Comment Ind 442-1

Please see Master Responses 14 and 15 regarding groundwater. In addition, as detailed in Chapter 4.5, Cultural and Tribal Cultural Resources, of the DEIR on page 4.5-21, InContext contacted Native American tribes with the potential to have knowledge of cultural resources in the project area, which included the Nevada City Rancheria Nisenan Tribe. Reponses were not received from any of the tribes. Furthermore, on November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to Native American tribes who had previously requested to be notified by the County. The tribes contacted by the County pursuant to AB 52 included the Nevada City Rancheria Nisenan Tribe. The Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. Finally, please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 443

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Kay Maston

Address: 11197 Lime Kiln Rd

Organization (if applicable): Representing myself

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 443-1

I moved to Grass Valley four years ago and I love the town and the people and the many local environmental groups that energize this community to create a strong bond with the natural beauty in this county.

But, that's not to say that living here is without it's challenges including a perrenial fire season, power outaages and home insurance at astronomical rates.

Ind 443-2

All of this is to say that in spite of the friends I've made and my connections to this community my roots here do not yet run deep.

Please vote this mine down. Don't tip the ~~sca~~ scale any more in favor of moving out of this area. Don't put in peril what people live in this area for. I lived in Oroville ~~during~~ during the Spillway repair. The amount of traffic caused by the trucks impacted our quality of life but at least it was for the greater good, not the potential profit of a foreign company!

Ind 443-3

Please vote no. Kmaston

INDIVIDUAL LETTER 443: KAY MASTON

Response to Comment Ind 443-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 443-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 443-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 444

From: Kayla Koontz <koontzk@berkeley.edu>
Sent: Monday, April 4, 2022 1:28 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR Comment

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Dear Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff,

Ind 444-1

I am writing to voice my opposition to the proposed plan to reopen the Idaho-Maryland Mine. The DEIR report clearly outlines several threats to our environment and our community's well-being. I am particularly concerned about the use of water (draining of our local groundwater/wells) as well as the proposed waste water dumping. At a time when our water resources are already severely threatened, this plan would exacerbate the deteriorating environmental conditions in our county. Although the DEIR report claims to have made ample plans to mitigate environmental impact, the report outlines several changes that would in full certainty negatively affect our environment notwithstanding the ever present danger of a repeat disaster like the Siskon Mine Well. Our community is centered around our beautiful natural environment, as is our tourism industry, and locals will continue to prioritize our future over a cheap deal with a dirty mine.

Thank you,
Kayla Koontz

1

INDIVIDUAL LETTER 444: PERSON

Response to Comment Ind 444-1

Please see Master Responses 13 through 16 regarding groundwater and Master Response 35 regarding water quality and discharge to the South Fork Wolf Creek.

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 445

From: Kayla Pearson <kaylaardell18@gmail.com>
Sent: Monday, April 4, 2022 3:38 PM
To: Idaho MMEIR
Subject: Regarding the Idaho Maryland Mine Proposal

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Hi there,

Ind 445-1 I hope that this note finds you and yours safe and healthy. I am writing in regard to the proposal surrounding reopening the Idaho Maryland mine in Grass Valley, CA.

I am not in favor of the re-opening based on multiple reasons.

Ind 445-2 One, it will cause massive depletion of groundwater reserves to the plants based on the millions of gallons of water per day needed to power the mining initiatives. Next, I am extremely concerned about the local wells that will be contaminated. Also, we have seen the damage that previous mining has done to this community. I am in favor of

Ind 445-3 learning from past missteps. The Nisenan people whose land this mine would be on have not been consulted or given

Ind 445-4 their blessing to move forward. The noise pollution based on close-quartered neighborhoods is another concern of this

Ind 445-5 operation taking place. Finally, looking at the CEO's last venture, it ended up polluting tribal waters, followed by bankruptcy, and a mess for locals to clean up.

Ind 445-6 Thank you for taking the time to review my concerns. I was raised in Nevada County. It's such a beautiful and special place. I urge you to please consider what would be lost if this project were to move forward. Please let me know if you have any questions.

With kind regards,

Kayla Pearson
(530)613-7677

1

INDIVIDUAL LETTER 445: KAYLA PEARSON

Response to Comment Ind 445-1
Please see Master Responses 1 and 33. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 445-2
Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 445-3
Please see Response to Comment Ind 442-1.

Response to Comment Ind 445-4
With respect to potential project impacts related to noise, please see the discussions under Impacts 4.10-1, 4.10-2, and 4.10-3, which start on pages 4.10-27, 4.10-31, and 4.10-37 of the DEIR, respectively.

Response to Comment Ind 445-5
Please see Master Response 3.

Response to Comment Ind 445-6
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 446

April 4, 2022

To: Matt Kelley, Senior Planner
or to whom it may concern

Re: Proposed opening of the Idaho-Maryland Mine

Dear Sir, My name is Keith A. Brown and I reside at 13936 Downwind Ct. My home will be negatively affected if this project is approved. I am heartily against this project. I understand that this mine closed in 1954 and with that Nevada County made the conscious decision to allow 68 years of urbanization up to the mine property. And now 68 years later they want to reverse this decision. This is unconscionable to consider approving this project to the detriment of the many property owners who will now suffer loss as to their property values and especially their water wells. I don't understand this thinking. Nevada County needs to stand by their decision that they made many years ago and protect their citizens.

Ind 446-1

Just a couple of observations: First, to dewater the mine will cause many wells to go dry. In my case NID put a water main down our road (Downwind Ct.) several years ago to connect their main up by the airport to their main at Brunswick Rd. In doing this we who live on Downwind Ct. specifically asked NID if while they were doing the construction could they add a lateral to the main so that we could obtain water in case the mine went thru. They told us no because the water main was so large that they would have to put in a pressure reducing station due to the pressure off the main and that was cost prohibitive for only a few connections. Therefore, NID water is not available if my well goes dry. By the way your letter states a water line will go along East Bennett which doers not help us here. What recourse will us well owners have if our wells go dry? Who will pay for new wells? What mechanism is in place for claims? How long would it take to get compensation? Also to dewater the mine means pumping out millions of gallons of tainted water (arsenic and mercury) and where will that go? And doing this during a drought. This makes no sense.

Ind 446-2

Next, the traffic on Brunswick, with their trucks running 24/7, will be chaos. There is the new housing subdivision (200 units) on Brunswick and Idaho-Maryland. Now you add the trucks and this will be a mess as well as the pounding the roads will take.

Ind 446-3

There will noise and vibration from underground blasting. All of this will seriously affect property values. Who will monetarily reimburse us for the lost value on our homes?

Ind 446-4

This will be an environmental disaster with no real benefit to Nevada County except a few jobs. Terrible trade off.

Ind 446-5

I have lived here since 1984. This will totally disrupt my life. This is not fair and this companies track record is horrible, with regard to maintenance and clean up. This has

Ind 446-6

been going on since the mid-nineties with Emperor Gold trying to open the mine. I am strongly opposed to this project. I pray that Nevada County will do the right and sane thing and not approve this project and protect their citizens. Thank you.

Regards, Keith A. Brown

INDIVIDUAL LETTER 446: KEITH BROWN

Response to Comment Ind 446-1
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 446-2
Please see Master Responses13 through 16 regarding groundwater.

Response to Comment Ind 446-3
Traffic is addressed in Chapter 4.12, Transportation of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 446-4
Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 446-5
Please see Master Response 2.

Response to Comment Ind 446-6
Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 447

From: Keith Thomassen <kthomassen@mac.com>
Sent: Wednesday, March 30, 2022 3:01 PM
To: Idaho MMEIR
Subject: The Mine

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Ind 447-1

You don't need to be an expert in any of the technical areas of the envrironmental report on the mine to make a sensible judgement on whether this mine should operate in Grass Valley. It simply doesn't pass the smell test. We all know the devastation that mining has created locally and elsewhere, with long lasting effects that has required expensive cleanup. And we know that the last project of the managers of this proposed mine ended badly for the environment; not a comforting thought as to whether they would do any better here. Finally, in my view, entrusting our environment to any company, let alone this one, to be conscientious stewards of this project for 80 years is unthinkable. The activity associated with this project is totally inconsistent with the kind of city we have become; one sought by people wanting a more quiet life from that in bigger cities, in a charming town with a variety of arts and entertainment, good restaurants, and outdoor activities in a scenic setting. If the project is approved I predict an exodus from the area of people and possibly businesses. I have personally heard, as have a number of my friends, of people coming to the area looking for housing only to walk away when they hear of the mine project.

Keith Thomassen
Grass Valley resident

INDIVIDUAL LETTER 447: KEITH THOMASSEN

Response to Comment Ind 447-1

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 448

From: Kelly Holland <kholland2920@gmail.com>
Sent: Monday, April 4, 2022 3:25 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Concerns for Opening Idaho Maryland Mine by Rise Gold

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Dear Matt Kelly and Nevada County Board of Supervisors,

Ind 448-1 I am writing this email as a concerned citizen of Nevada County living here for over 22 years. I have had the opportunity to work and raise a family in this county. I am currently living near Memorial Park off Highway 174, one of the areas that will be affected by the 24/7 truck traffic. I was excited with all the renovations being done at Memorial Park, then learned if the Idaho Maryland mine opens, it will impact the peace and quiet of that area, because the truck traffic will be along highway 174. The truck traffic will be detrimental with the noise and air pollution caused by the non-stop truck trips. Below are some of my concerns with the mine opening. There are many, but I will focus on just a few that are quite concerning.

Ind 448-2 1. Truck traffic - up to 100 one way trips a day, 7 days a week, 16 hours a day!
Ind 448-3 2. Grading and rock compacting noise - 5 days a week for 11 years!
Ind 448-4 3. Noise - from compacting, excavating and grading engineered fill piles up to seven stories tall. The excavating and grading could affect spare the air days and our already high ozone area with rock particles floating in the airways.
Ind 448-5 4. Noise and vibration from the underground blasting and drilling.
Ind 448-6 5. Rezoning will raise the current limits to include more noise and traffic.
Ind 448-7 6. Concerned that home values will drop (have heard $50,000 - $100,000) that are within a seven mile radius of the mine.
Ind 448-8 7. Dewatering all the tunnels. Grass Valley and Nevada City are built with tunnels under them. If the water is drained, what impact will that have on the ground structure? Could it contribute to sinkholes in and around the mine area? What about the contamination of the existing wells that could run dry? What about the arsenic and other chemicals that could leach into the water systems? It has been over 60 years since Empire Mine closed and there are still contaminants found in the waters.

Ind 448-9 These are just a few of my main concerns and questions. There are many other concerns I have with Rise Gold opening the Idaho Maryland mine that I have not mentioned. My husband and I love this area, but have considered selling if the mine gets approved. Our grown children have even come back to live in this area, and it saddens me to think what will happen to this county if this mine gets approved.

Thank you,

Kelly and Jim Holland
Grass Valley, CA

INDIVIDUAL LETTER 448: KELLY AND JIM HOLLAND

Response to Comment Ind 448-1
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 448-2
Traffic is addressed in Chapter 4.12, Transportation of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 448-3
Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 448-4
Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Air quality associated with dust is addressed in Master Response 12. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 448-5
Please see Response to Comment Ind 448-3.

Response to Comment Ind 448-6
Impacts of the proposed rezoning are addressed throughout the DEIR. Noise in Chapter 4.10, Noise and Vibration, and traffic in Chapter 4.12, Transportation. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 448-7
Please see Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 448-8
Please see Master Responses 13 through 16 regarding groundwater and Master Response 29 – Near Surface Workings and Subsidence.

Response to Comment Ind 448-9
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 449

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Kelly Trueman

Address: 13721 McKitrick Ranch Rd

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 449-1

There is literally no good reason other than the greed of a few people, for this mine to go ahead.

This community will be heavily impacted negatively for potentially centuries to come.

The water will be poisoned, the habitat & local animals & fish will be negatively effected

The reasons behind this movement do not justify the impact.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 449: KELLY TRUEMAN

Response to Comment Ind 449-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 450

From: kendal smeeth
To: Idaho MMEIR
Subject: Comment on EIR and proposed reopening of the mine
Date: Friday, February 4, 2022 9:07:32 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attention: Matt Kelly

Ind 450-1 As a resident of Nevada City, I am opposed to reactivating the Idaho Maryland Mine. During my 48-year career, I spent many years preparing and/or reviewing Environmental Impact Reports. This EIR, in my experienced opinion, skews the data to downplay environmental impacts from truck traffic in particular and operations in general and exaggerate the jobs and other economic benefits of the mine. Their proposed use of our water would seem to be reason enough to deny acceptance of the EIR.

Ind 450-2 I hope the Planning Commission and Board of Supervisors do not allow the lure of tax dollars to blind their understanding of the harm mine operations will cause to our quality of life. Grass Valley and Nevada City are rare gems among California's livable cities. While many other areas in our state may be acceptable for this kind of heavy industry and related pollution, we must protect our fragile forests, air quality, and precious few water resources. Please do not make the mistake of thinking this EIR adequately describes the mine's immediate or long-term affects on our unique, treasured way of life here in Nevada City/Grass Valley.

Sincerely,
Kendal Smeeth
13607 Red Dog Road
Nevada City, CA 95959

Sent from Mail for Windows

INDIVIDUAL LETTER 450: KENDAL SMEETH

Response to Comment Ind 450-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 450-2

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 450

From: Kerrick Anderson
To: Idaho MMEIR
Date: Thursday, February 10, 2022 2:47:21 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear County of Nevada

Ind 451-1 I am writing to ask you on bended knees NOT to allow the mine to go through. I'm not quite sure why this is even a question, as you must've known from the start the PEOPLE of this county do not want it in our beautiful home. I can only think that your motivation is to bring tax dollars into our county, but you must know that is not enough. Those dollars will end up cleaning up the mess left by the mine and all the people this mine has affected. Please represent your people and understand that the almighty dollar is not that important. We must maintain our beautiful quality of life.

Ind 451-2 Remember also, that no matter what they say, there will be problems with this endeavor. Wells will go dry and become contaminated. Who will fix that? Not the mine. Not the county. Are you going to leave us stranded?

Ind 451-3 Our property values will go down, as who wants to live by a noisy, dirty mine and worry about our wells. Are you going to leave us stranded?

Ind 451-4 Who will protect us from pollution, increased traffic and cave ins? Are you going to leave us stranded?

No matter what the studies say, we will have problems and all of them will fall on the people you represent. Is that right?

Let's do what is right and not what looks to be a money maker. Please protect the people and the environment you represent

Thank you

Kerry and Sue Anderson

Sent from my iPad

INDIVIDUAL LETTER 451: KERRY AND SUE ANDERSON

Response to Comment Ind 451-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 451-2

Please see Master Responses 13 through 15. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 451-3

Please see Master Response 2 – Social and Economic Impacts. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 451-4

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 452

Ind 452-1

Dist 1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new well-paying jobs that can provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 600 new employees in safe and satisfying careers with an average expected annual earnings of more than $92,000 including benefits. The mine will also spur an additional 300 jobs through related new businesses in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO! We do NOT support re-opening the mine.

Name(s) Kim + Don Crevoiserat

Address 13243 Loma Rica Dr, GV ZIP 95945

Phone 530392.0424

Email Address kimcrev@yahoo.com

INDIVIDUAL LETTER 452: KIM CREVOISERAT

Response to Comment Ind 452-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 453

PRSRT STD
U.S. Postage
PAID
TMG

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-4 P33 104 ECRWSH C002
[redacted]

Kim James
11088 Crescent Dr.
Nevada City, CA 95959-3447

Nevada County Board of Supervisors
950 Maidu Ave.
Nevada City, CA 95959
Attn: Heidi Hall

RECEIVED
FEB 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Please fill out and send back to us your support for the Idaho-Maryland Mine



DO NOT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 600 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

DO NOT
NO MINE

Name(s) [redacted]

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

RECEIVED
FEB 28 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ind 453-1

INDIVIDUAL LETTER 453: KIM JAMES

Response to Comment Ind 453-1

Please see Master Response 1 Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 454

Dist 1

RECEIVED

FEB 28 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

February 24, 2022

Kim James
11088 Crescent Drive
Nevada City, CA 95959

Nevada County Board of Supervisors
950 Maidu Ave.
Nevada City, CA 95959

ATTN: Heidi Hall

RE: Idaho-Maryland Mine

Dear Supervisor Hall,

Ind 454-1 I have been a Nevada County resident for over 20 years. I am very concerned about the harmful impacts of the Idaho-Maryland Mine, regarding noise pollution and quality of life.

For two years I lived on Dorsey Drive in Grass Valley, which became a commonly used road for large trucks after the onramps and offramps were installed. The constant noise from random large vehicles was unbearable and I moved. I sure wouldn't want to live near a dedicated mining operation.

There are many questionable claims made by Rise Gold, which seems to be a troubled and untrustworthy company, which is reason enough to be skeptical of their intentions.

Ind 454-2 Please do not approve the Idaho-Maryland mine project.

Do the right thing and protect our community.

Thank you,

Kim James

INDIVIDUAL LETTER 454: KIM JAMES

Response to Comment Ind 454-1

Noise is addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 454-2

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 455

January 30, 2022

Matt Kelley
Senior Planner
Nevada County Planning Department
Idaho.MMEIR@co.nevada.ca.us

Mr. Kelley

I am submitting comments on technical evaluations presented in the Idaho-Maryland Mine Project DEIR.

Ind 455-1

1. **Carbon offset plans for GHG mitigation**: The county should require that these carbon offsets be purchased from Nevada County/ surrounding county sources and there should be a bond in place that guarantees performance of these offsets for at least 10 years before the project applicants' responsibility is complete. There are several reasons for this. First, carbon offsets are extremely difficult to measure and guarantee. Having the offsets be local would allow oversight of performance. Second, Nevada County needs to move towards climate change resiliency and a lower carbon future. Keeping the benefits of the GHG carbon offsets in the same place as the environmental costs of the mine is consistent with sustainable practice.

Ind 455-2

2. **Groundwater monitoring wells**: Previous hydrologic studies in Nevada County have concluded that the fractured bedrock aquifer supplies water to do not work the same way alluvial aquifers do. Water levels at one site may have completely different response times than water levels at a nearby site because the fracture networks supplying those wells may not be connected. As a result, using area-wide potentiometric contour maps as a means of evaluating dewatering impacts is not appropriate. Additionally, local precipitation is highly variable, meaning that groundwater levels in individual wells will probably vary with the frequency of major storm events.

   A scientifically defensible water level monitoring network requires measuring water levels at a frequency greater than anticipated changes in order to clearly ascertain the difference between natural recharge, current hyper-local water uses, and the impact of the project's dewatering. In addition, the network of water monitoring sites must extend outside the subsurface footprint of the mine tunnels (the underground minerals rights area) and include wells in riparian zones to track where groundwater depletion may begin affecting surface water flows.

   The current plan is technically insufficient because it does not require the spatial extent and frequency needed to provide an early-warning for irreversible dewatering impacts. It also allows for improper seasonal averaging of data and for improper averaging of water level measurements across the site when impacts could be severe and unmitigated in a portion of the site.

Ind 455-3

3. **Groundwater depletion mitigation**: The current plan for mitigation of groundwater depletion impacts (4.8-2(b)) says the "project shall be responsible for providing a comparable supply of water to such homes and businesses whose wells are significantly impacted." This plan presumes that water is available for purchase to provide that supply, and that NID or deeper wells will be able to provide the water in question.

This graph shows the overall decline in the county's groundwater levels since 1970s due to the increased number of domestic wells and population.

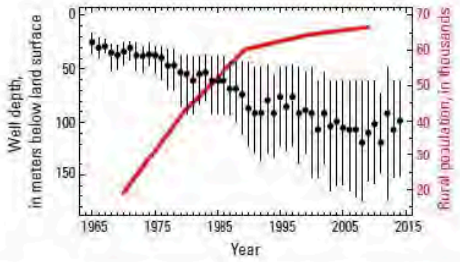

Figure 2. Well-completion depths in the study area binned by year: points represent the median of annual data and whiskers span the interquartile range. Rural population (red line) represents census population data for the unincorporated area of Nevada County from 1970 to 2010.

During droughts, many of the existing wells in the County are already running dry, so having the project proponent deepen an affected well may not end up providing a reliable source of water over the long-term. The plan also relies on NID being able and willing to extend service. The project should not move forward unless and until NID provides documentation about how much backfill water supply the agency can actually provide beyond the estimated 30 homes. The determination that there is a less than significant impact on public services 4.11-10 is inaccurate and based on incomplete analyses.

For scale, the initial dewatering volume is estimated to be 2500AF over the first six months of operation and 1376 AF/ year on an ongoing basis (p. 177 and p. 3-18) . NID currently supplied 8657AF to all public water supply customers in 2020 (NID Urban water management plan). In other words, the project is planning to send about **one third of the volume of NID's total annual treated water supply downstream in the first six months of pumping; continuous dewatering estimates are for a volume equal to about 16% of total treated water supply to be sent downstream.** These are, of course, estimates. The actual amount could be vastly different. The County needs to have plans in place that would require cessation of dewatering if the actual performance of the project ends up with different water volumes/ dewatering impacts than projected.

SB 552 was enacted on September 23,2021 and requires the County to plan for and facilitate water shortage preparedness planning. The potential impact of dewatering and exporting per year volume of water from the County should be evaluated in the context of future drought resiliency before this project is approved. The legal distinction that groundwater in Nevada County is not part of a groundwater basin is a technical justification for avoiding this issue. It is not sound policy or science, and the County has a duty to consider long-term sustainability regardless.

Respectfully,
Kim Taylor, 10231 Mills Rd Grass Valley 95945

INDIVIDUAL LETTER 455: KIM TAYLOR

Response to Comment Ind 455-1

The commenter asserts that the carbon credits that are to be purchased as mitigation for the project's GHG emissions should involve a bond to ensure performance and should also be purchased locally. The requirements for carbon credits are detailed in Mitigation Measure 4.3-7(b) of the DEIR. Also, please see Master Response 28 – Greenhouse Gas Credits.

As specified in Mitigation Measure 4.3-7(b), the carbon offset must be retired prior to the issuance of the project's first grading permit and therefore a bond is not required. The mitigation measure requires an instrument, credit or other certification issued by the specified registries for GHG reduction activities within the Nevada County region. Global climate change is by definition a global impact; therefore, purchase of credits from offsets produced locally would not reduce the impact or change the effectiveness of the mitigation.

Response to Comment Ind 455-2

The commenter states that previous studies in Nevada County have determined that fractured bedrock aquifers do not work the same way as alluvial aquifers and that use of area-wide contour maps is not appropriate. The commenter does not provide the name or details of previous hydraulic studies in Nevada County which conclude that the fractured bedrock aquifer does not work the same way as alluvial aquifers. However, Section 3.4.4 of Appendix K.2 and Section 4.8.2 of the DEIR (at page 4.8-18) discuss the flow of groundwater within fractured bedrock in the project area. The groundwater model used an appropriate methodology to predict groundwater drawdown from mine dewatering in bedrock, and is not assuming that water in bedrock is exactly the same as in an alluvial aquifer. Please see Master Response 14 – Adequacy of Groundwater Model.

The commenter states that local precipitation is highly variable and groundwater levels in individual weeks will probably vary with the frequency of major storm events. Due to variations in topography, for example between downtown Grass Valley and on Banner Mountain, local variation in precipitation may be appreciable. However, as discussed in Section 3.2 and shown on Figure 3-4 of Appendix K.2 of the DEIR, rainfall variation between wet and dry climatic cycles can vary by more than a factor of three. Despite this magnitude of variation, the available data shows that seasonal cycles in groundwater levels in local domestic supply wells remain relatively consistent from year to year and do not show any notable fluctuations in response to very wet years or very dry years, as shown on the hydrographs in Appendix B of Appendix K.2 of the DEIR and discussed in Section 4.8.2 of the DEIR (at pages 4.8-11 to 4.8-12). Thus, potential variations to recharge and the effects on groundwater levels has been considered in the DEIR, based on both local rainfall data and actual monitoring data from local groundwater wells. No groundwater level measurements have been completed since 2007, which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation



Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures.

The commenter states that water level monitoring requires monitoring of water levels at a frequency greater than expected changes in order to ascertain the difference between natural recharge and the impact of the project's dewatering. The well monitoring plan incorporates the collection of water level data for 12 months prior to the commencement of dewatering. This baseline information allows the effects of natural recharge, and seasonal variability, to be accounted for in the measurement of the effect on water levels from mine dewatering. Monitoring wells are also located outside of the impact area of mine dewatering to measure regional changes in water levels in order to differentiate groundwater drawdown from mining versus background conditions. As stated on page 13 of Appendix K.8, each monitoring well will be equipped with a downhole submersible data logger that will record water levels over time. The data logger will be programmed to collect water-level information on a periodic basis, such as once every 1 to 4 hours. Therefore, water level monitoring will be collected at a frequency greater than expected changes and can be collected at appropriate intervals to measure the response to mine dewatering. Seasonal averaging of data or water level measurements would occur as claimed by the commenter. The network of water monitoring wells is planned to extend outside of the subsurface footprint of the mine tunnels (see Appendix K.8). The location of underground mineral rights boundaries is irrelevant as the location of existing and proposed underground mine workings will determine the impact to groundwater levels.

Monitoring wells in riparian zones are not required. Mine dewatering will not impact riparian zone or groundwater dependant vegetation. Please see Master Response 33 – Groundwater Dependent Vegetation. The project will not significantly affect surface water flows, see page 4.8-65 of the DEIR.

Please also see Master Response 7 – Location of Future Mining Areas. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 455-3

The commenter provides a graph of well depths in Nevada County from the period of 1970 through 2010 but does not provide the source of this material to allow for an evaluation or a technical response. As disclosed in Section 3.3.2.2 of Appendix K.2 of the DEIR, the water levels in the private domestic wells have seasonal fluctuations that may range from 10 feet to 50 feet between wet and dry times of the year, but remain relatively consistent from year to year within each individual well. During the monitoring period, several years with below normal rainfall occurred (2001, 2004, and 2007), multiple years with above normal rainfall occurred (1995-1998 and 2006), and several years of near-normal rainfall occurred (1999, 2000, 2002, 2003, 2005). Despite large variations in annual rainfall from year to year, the seasonal water level cycles in individual wells remained consistent over time and the overall water levels shown on the hydrographs for each well do not fluctuate based on wet or dry climatic cycles. The analysis in the DEIR relied upon local data from wells in the project vicinity. Without a source citation or the actual data upon which this comment is based, the County does not have a basis upon which to compare it with the data

relied upon for the EIR. No groundwater level measurements have been completed since 2007, which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures.

As discussed in the Well Mitigation Plan, if a dewatering impact to an area outside of the E. Bennett area were projected during operations, pre-emptive action would be taken as necessary to ensure immediate water supply and compensation. The comment is incorrect in stating (with underline added for emphasis) that the mitigation plan presumes that water is available to purchase, since one of the options under the plan is to deepen an affected well. Well deepening does not require purchase of any water. In addition, if reduction of the water column in a well was great enough to reduce the well's yield, adjustment of the pumping system may only be required; for example, by pumping at a lesser rate over a longer duration and installing or increasing the size of a pressure or holding tank. In the unlikely case where these measures were not sufficient, appropriate mitigation could be the deepening of a single well, drilling of a new well, or the provision of potable water service.

Comparison of the volume of water that would be pumped from the mine with NID's treated water supply is not relevant. The treated water supply is provided by NID's "upper division" surface water system that relies on annual snowmelt and available reservoir capacity. The water pumped from the mine will consist of seepage of groundwater into the underground workings from depths that are considerably deeper than local groundwater supply wells. Mitigation measures in the DEIR and parts of the County Code define the actions that the operator would need to take if any wells are impacted by the project. If those measures are not or cannot be successfully implemented, then the County would have the ability to issue a Notice of Violation of the permit and could require cessation of dewatering if the violation is not corrected. Thus, such plans are already in place.

Senate Bill 552 of 2021 applies to small water suppliers with fewer than 1,000 connections and to schools that maintain their own water system. Other existing regulations related to water shortage planning already apply to NID, which has approximately 25,000 connections (see https://www.nidwater.com/our-story) and the County. Both NID and the County are in compliance with applicable drought resiliency requirements.

Individual Letter 456

From: KIM / PAUL CAPPA <kimcappa@comcast.net>
Sent: Monday, April 4, 2022 9:32 AM
To: Idaho MMEIR
Subject: DEIR deficiencies

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Mr. Matt Kelley,

My name is Kimberly Cappa, I am in District 3, I retired to this beautiful community 5 years ago.

Ind 456-1 I spent my career at an oil refinery in the bay area. As much as you like to think that safety is #1...there is ALWAYS going to be mechanical failure or human failure for that matter. This is why I am against the re-opening of the Idaho-Maryland mine.

Ind 456-2 After looking over the DEIR, I believe there are some impacts that ARE NOT going to be mitigated. The greenhouse gas emissions are unavoidable. I know from working at the refinery 23 years that California keeps working to get those emissions numbers down. Our legislators have passed a climate policy to reduce GHG. What Rise Gold acknowledges now, MIGHT be within the limit, but in 2030 it will be OVER the limit. And years into the future even worse, it just isn't feasible. And if they think they can purchase carbon offsets they are wrong and California will say NO DEAL.

Ind 456-3 There are other impacts I don't think they can mitigate such as the noise levels, fire and explosion evacuations, groundwater issues, explosives in transit/storage and loss of habitat for local birds and animals.

Ind 456-4 Another important thing I'd like to comment on is the fact that the DEIR did not even mention that this will bring property values down. We don't want spoiled air, land or water in our backyard.

Thank you for taking the time to hear my concerns,
Kimberly Cappa

INDIVIDUAL LETTER 456: KIMBERLY CAPPA

Response to Comment Ind 456-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 Non-EIR/Administrative Issues.

Response to Comment Ind 456-2

Please see Master Responses 25 through 28. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 456-3

Noise is addressed in Chapter 4.10, Noise and Vibration of the DEIR. Evacuations are addressed in Master Response 5 – Evacuation Zones. Please see Master Responses 13 through 16 regarding groundwater. Hazards are addressed in Chapter 4.7, Hazards and Hazardous Materials of the DEIR, and impacts to wildlife is addressed in Chapter 4.4 Biological Resources of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 456-4

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 457

March 28, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as the damage the character and vitality of the community.

Ind 457-1

Significant and Unavoidable Impacts

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

• Aesthetics

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

Ind 457-2

• Noise.

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

• Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable

Ind 457-3

even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way). Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

Preference of the No-Build Alternative

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensure that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.
- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not have a substantial adverse effect to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project

construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

- Geology/Soils
  - The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.
- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
  - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project

includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.

- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.
- Tribal Cultural Resources
  - The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

Ind 457-4

Beyond the Scope of CEQA

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

Ind 457-5

The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area. Certainly, community members have voiced their concerns in significant numbers. It is clear that our community takes great pride in the environment in which we live and want to protect it. Any activity that undermines our attraction of tourism and to the draw of people who so recently are moving to this community to work remotely is a negative for the members of this beautiful, historic community. It is true that adding jobs to our local economy could be a valuable boost. But there are other jobs that could be encouraged. A good portion of the jobs that Rise Gold is promising are trucking jobs. Will those truly be given to local people? Furthermore, those of us that live here are taking steps to conserve water and are alarmed for our neighbors that have wells. Many variables could impact ground level and our residents consider any deep underground disturbances to be an unnecessary risk during this time of severe drought. So many of us have friends who already have well issues. This is evidence that our environment is fragile

Ind 457-6

Ind 457-7

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me at shureen@pacbell.net

Sincerely,

Kimberly Shureen

INDIVIDUAL LETTER 457: KIMBERLY SHUREEN

Response to Comment Ind 457-1
The comment restates conclusions of the DEIR, but does not specifically address the adequacy of the DEIR.

Response to Comment Ind 457-2
The comment restates the significant and unavoidable conclusion in the DEIR, but does not specifically address the adequacy of the DEIR.

Response to Comment Ind 457-3
The comment expresses the preference for the No Project Alternative and cites the analysis of the No Project Alternative from Chapter 6, Alternatives Analysis, of the DEIR. The comment does not specifically address the adequacy of the DEIR.

Response to Comment Ind 457-4
Please see Master Responses 1 and 2.

Response to Comment Ind 457-5
Please see Master Responses 1 and 2.

Response to Comment Ind 457-6
Please see Master Response 2.

Response to Comment Ind 457-7
Please see Master Responses 13 through 16 related to groundwater. Please see Master Response 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 458

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: KOLL SHANE

Address: 12433 SUMMIT RIDGE RD

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 458-1

I COMPLETELY OPPOSE THE RISE MINE FOR ENVIRONMENTAL SOCIATAL & HYDROLOGIC REASONS. ITS MADNESS

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 458: KOVIL SHINE

Response to Comment Ind 458-1

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 459

Dist 1

Nevada County Board of Supervisors
950 Maidu Avenue
Nevada City, CA 95959-8617
bdofsupervisors@co.nevada.ca.us

RE: Businesses OPPOSE Rise Gold's proposal to re-open the Idaho-Maryland Mine

Dear Supervisors:

The undersigned businesses respectfully request that you oppose Rise Gold's proposal to re-open the Idaho-Maryland Mine.

Ind 459-1

Mining is our past, not our future. During the past 50 years, Nevada County has worked diligently to attract people and investments that contribute to and renew its economic vitality through promising and sustainable enterprises which align with the aspirations of its residents. That is what continues to make this County an attractive place to live, to make a living, and to start new business ventures.

Ind 459-2

Reopening the mine risks a transformation from a community that is a scenic and cultural destination to an industrial town that tolerates excess noise, dust, and truck traffic. It would entail supporting a business that puts precious water resources at risk, generates significant greenhouse gases, and consumes so much energy that it would completely erase the county's plan to reduce the effects of climate change. The mine could become a deterrent for many seeking to build new business opportunities in Western Nevada County, resulting in reduced community investment and property values. We welcome the County's call for an independent economic study of the impacts of the proposed mine and expect that it will include a non-mine alternative.

Ind 459-3

Ind 459-4

Rise Gold's promises to inject money into the local economy may sound attractive, but Nevada County can do better by continuing to invest in existing industries as well as new enterprises that address current priorities in the Sierra like watershed and forest management. The Economic Policy Institute Brief cited by Rise Gold actually shows that other industries can produce far better job numbers than mining, including eight industries Nevada County already has today. An economic study commissioned by the City of Grass Valley during Emgold's attempt to reopen the Idaho-Maryland Mine in 2008 concluded that Nevada County would be better off economically if it pursued other opportunities than mining.

An industrial gold mine would not be a constructive addition to our community. The social and economic benefits are far from clear. The environmental impacts are sobering.

We urge you to protect our health, economy, and quality of life. Please deny Rise Gold's application to reopen the Idaho-Maryland Mine.

Ind 459-5

Thank you for your time and consideration.

Sincerely,

Kristen Hensley

Kristen Hensley

Cc: Alison Lehman, County Executive Officer, Nevada County
Grass Valley City Council members
Tim Kiser, City Manager, Grass Valley
Grass Valley Union

INDIVIDUAL LETTER 459: KRISTEN HENSLEY

Response to Comment Ind 459-1
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 459-2
Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 459-3
The comment does not address the adequacy of the DEIR. Please see Master Response 2.

Response to Comment Ind 459-4
The comment does not address the adequacy of the DEIR. Please see Master Response 2.

Response to Comment Ind 459-5
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 460

Dist 3 RECEIVED

MAR 0 1 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

February 22, 2022

Dear Nevada County Board of Supervisors,

My Name is Kristen Krauel-Privett. I live near the Empire Mine State Park in District 3 with my husband and our 13 month old daughter. I am a Licensed Clinical Social Worker (LCSW) for the Sierra Foothills Veterans Clinic in Auburn and my husband is a longshoreman out of the Port of Oakland. I am hoping that you will deeply consider my comments in regard to determining whether to approve the opening of the Idaho-Maryland Mine in Grass Valley.

Ind 460-1

Like a lot of families, our family chose to move to Grass Valley to be closer to nature and a natural way of life. My husband and I both grew up in remote Modoc County. We lost touch after high school but serendipitously reconnected after moving to San Francisco within weeks of each other for our jobs. After bringing our baby girl into the world, we knew we wanted to raise her in a community in which she would have the opportunity to cultivate a strong relationship with the outdoors and Mother Earth. Things we both feel benefited us tremendously growing up. An area in which she could safely walk or ride her bike about the neighborhood, raise animals, and enjoy the natural beauty of her surroundings while still maintaining access to a variety of medical care and shopping.

Ind 460-2

Unfortunately, we didn't learn of the potential opening of the Idaho-Maryland Mine until after we moved here. Had we known, we may not have taken the risk. We have dire concerns that the opening of the mine will result in higher noise levels, including vibration from blasting, and harm to the surrounding wildlife and natural settings. Our prior living in San Francisco made us all too aware of the negative impact high noise levels can have on one's quality of life. As a longshoreman, my husband experiences a detrimental level of noise and machinery related vibration on the job. This is yet another reason why we chose to move to Grass Valley, as working AND living in noise infested environments is not a healthy combination for my husband (nor anyone for that matter). His work, however, influenced him to immerse himself in learning about the negative impact of industrial vibrations on physical and mental health as well as various sound healing modalities.

Ind 460-3

In addition to noise related dismays, we worry the mine will seriously compromise the quality of our air and water. I understand the water quality board will have to rely on Rise Gold, a mining company with a history of environmental violations, for environmental assurances reports. Our daughter's pediatrician educated us about the risk the mine poses to her health (not to mention our health and the health of our community). I am tearing up as I think about our smiley daughter being subjected to increased toxins through the water she drinks and air she breathes. After being diagnosed with endometriosis and battling related fertility challenges to have our miracle baby, I learned a great deal (more than I would've liked) about the link between environmental toxins, fertility, and health. I would hate for our daughter and community to fall victim. Surely the few jobs gained from the mine will be seriously offset by the risk of losing health conscious San Franciscans (I'm sure you know Grass Valley has become a popular destination for this population) and their businesses, tourism, millions in property values, and the list goes on. The mine will destroy the majority of the reasons people are drawn to Grass Valley. More pavement, mine waste, loud noises, poorer air and water quality. This is definitely not the sort of environment we envisioned raising our sweet daughter in and I know many, many parents who feel the same way.

I am urging you NOT to approve Rise Gold's application to open the mine.

Sincerely,

Kristen Krauel-Privett

INDIVIDUAL LETTER 460: KRISTEN KRAUEL-PRIVETT

Response to Comment Ind 460-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 460-2

Noise and vibration are addressed in Chapter 4.10, Noise and Vibration of the DEIR. Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 460-3

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 461

From: Kristen Krauel
To: bdofsupervisors
Subject: Please vote NO on the Idaho-Maryland Mine
Date: Tuesday, February 22, 2022 3:18:10 PM

Unable to identify Dist

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Dear Nevada County Board of Supervisors,

My Name is Kristen Krauel-Privett. I live near the Empire Mine State Park in District 3 with my husband and our 13 month old daughter. I am a Licensed Clinical Social Worker (LCSW) for the Sierra Foothills Veterans Clinic in Auburn and my husband is a longshoreman out of the Port of Oakland. I am hoping that you will deeply consider my comments in regard to determining whether to approve the opening of the Idaho-Maryland Mine in Grass Valley.

Ind 461-1

Like a lot of families, our family chose to move to Grass Valley to be closer to nature and a natural way of life. My husband and I both grew up in remote Modoc County. We lost touch after high school but serendipitously reconnected after moving to San Francisco within weeks of each other for our jobs. After bringing our baby girl into the world, we knew we wanted to raise her in a community in which she would have the opportunity to cultivate a strong relationship with the outdoors and Mother Earth. Things we both feel benefited us tremendously growing up. An area in which she could safely walk or ride her bike about the neighborhood, raise animals, and enjoy the natural beauty of her surroundings while still maintaining access to a variety of medical care and shopping.

Ind 461-2

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Ind 461-3

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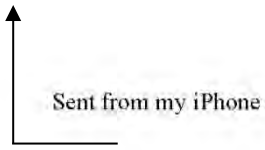
I am urging you NOT to approve Rise Gold's application to open the mine.

Sincerely,

Kristen Krauel-Privett


Sent from my iPhone

INDIVIDUAL LETTER 461: KRISTEN KRAUEL-PRIVETT

Response to Comment Ind 461-1
See Response to Comment Ind 460-1.

Response to Comment Ind 461-2
See Response to Comment Ind 460-2.

Response to Comment Ind 461-3
See Response to Comment Ind 460-3.

Individual Letter 462

From: Kristy Bennett <KristyAnneBennett@outlook.com>
Sent: Saturday, April 2, 2022 4:30 PM
To: Idaho MMEIR
Subject: Please do not agree to this mine opening

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To: Matt Kelly, Senior Planner for the Nevada City Planning Commission

Ind 462-1 I was a helper at a deep rock mine years ago and there is no telling what type of horrible toxins are buried underground as I found out to my detriment and which I am still recovering from.

So, obviously, I have been very alarmed that the Nevada City Planning Commission is considering opening the Idaho Maryland Mine. I was in a chemical accident that could have been avoided if others had taken action prior to being exposed to toxic chemicals.

Ind 462-2 And it seems to me completely cruel to expose the Nevada County populace with what this mining firm has in mind. Not only the by the additional traffic on Brunswick road with large trucks, especially considering a large housing development is also going to impact Brunswick Road, but as well as dumping toxic waters into a stream.

Ind 462-3 So I ask you, from someone who has been almost killed by underground mine waters being dumped near me, to NOT ALLOW THEM TO POLLUTE OUR WATER, AIR OR OUR ROADWAYS. If you do so it will allow this firm to destroy out peaceful harmony and low pollution that we have here, just for the sake of money and a few jobs.

Sent from Mail for Windows

1

INDIVIDUAL LETTER 462: KRISTY BENNETT

Response to Comment Ind 462-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 462-2

Traffic is addressed in Chapter 4.12, Transportation, of the DEIR. See Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 462-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 463

From: Tim
To: BOS Public Comment
Subject: Rise Gold NO!
Date: Saturday, February 26, 2022 4:10:10 PM

Dist 1

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Ind 463-1

The Science is clear, please don't allow the mine to reopen!

L. Tim Ackerman M.S.
Nevada City CA 95959

INDIVIDUAL LETTER 463: L. TIM ACKERMAN

Response to Comment Ind 463-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 464

From: Laina Reynolds Levy <lainalevy@gmail.com>
Sent: Monday, April 4, 2022 9:43 PM
To: Idaho MMEIR
Cc: Matt Levy; deircomments@cea-nc.org
Subject: Comments on Rise Gold/ Idaho-Maryland Mine DEIR

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Dear Mr. Kelley and Planning Commission members,

My husband and I are homeowners on Anchor Lane in District 3, about 1/2 mile from the Brunswick mine site and within the mineral rights boundary of the project. We would like to register our concerns about the Draft EIR.

1) Wells Mitigation Plan
Appendix K.9, p.1 of the DEIR says that " All potentially impacted wells are located in the E. Bennett Road area. Domestic water wells outside this area will not be impacted." It is concerning, therefore, that in chapter 4.8, p.55 it states that the "Base Case" analysis conducted is only relevant within a 25-year period. However, the proposed project is requesting a permit to cover 80 years of mining activity, during which time the tunnels and impacts would presumably expand to additional sites within the mineral rights boundary.

Ind 464-1

Nowhere in chapter 4.8 does the DEIR discuss how the mining company would monitor for impacts on domestic wells outside of the very limited E. Bennett Rd study area should an unexpected or "worst case scenario" occur, despite the uncertainties inherent in mining in fractured bedrock. In fact, Appendix K.7 specifically calls out the inadequacy of the DEIR analysis, stating:
"it is possible that mining activities, including blasting, backfilling with CPB, and sealing of drains or areas of the underground workings, could activate leaching and groundwater flow in new subsurface areas, potentially resulting in impacts to neighboring wells (p.8);" and

"A major assumption is that flow contributions from the workings are distributed uniformly across the mining areas after correcting for depth. However, the subsurface distribution and orientation of bedrock fractures is not uniform and is subject to uncertainty. (p.12)"

We are concerned that our well, and those of our neighbors, could suffer dewatering as a result of mining activities. The DEIR does not adequately address uncertainties in the hydrology models over the 80-year period of the project nor does it provide a plan for establishing a baseline, monitoring, and mitigating impacts on all domestic wells within the mineral rights boundary.

2) Traffic and road safety
We drive our children to and from school along E. Bennett Rd and Brunswick Rd. every day. We would directly suffer the "significant and unavoidable" consequences of the 428 additional daily truck and vehicle trips generated by this project (Chapter 4.12, p. 34). In addition, our key fire evacuation routes include the Brunswick/Sutton Rd. intersection and the Brunswick/Hwy 174 intersection, both of which are foreseen to suffer significant increases in congestion, queues and wait time.

Ind 464-2

We believe that the DEIR chapter 4.12 fails to appropriately analyze and provide mitigations for the impact of additional truck and vehicle traffic on the safety of residents in the (very likely) scenario of a wildfire or other other emergency evacuation along the identified road segments and intersections. On page 92, it discusses emergency vehicle access to the mining site on Brunswick Rd, but does not discuss how increased traffic along impacted roads will slow down firetrucks and other emergency vehicles access to homes in a wildfire situation.

1

Ind 464-3

For these reasons, we urge the members of the Planning Commission to require that the DEIR be revised to include
1) a more thorough and accurate assessment of the potential impacts on groundwater and domestic wells within the entire mineral rights boundary over the 80-year project lifespan, and
2) a traffic analysis that includes the safety of traffic flows in an emergency scenario such as a wildfire evacuation.

Thank you for your consideration,
Laina and Matt Levy
Anchor Ln
Grass Valley, CA

--
Laina Reynolds Levy
lainalevy@gmail.com (415) 216-5797

INDIVIDUAL LETTER 464: LAINA LEVY

Response to Comment Ind 464-1

The commenter is concerned that its well could be impacted by the mining project and asserts that the DEIR does not adequately address uncertainties in the groundwater models. The groundwater model was based on the expected mining plan during year one to year 25, and then Sensitivity Scenario 6 considered the significant expansion of mining in areas with potential for mineralization as shown in Figure 5.10 of Appendix K.3 of the DEIR for an additional 40 years of mining. As shown in Figure 5-12, and discussed on page 29 of the report, the 5-ft drawdown contour extent of Scenario 6 at the end of potential additional mining (to Year 65) relative to the 2019 water level expands less than 500 ft from that of the Base-Case Scenario. The drawdown contour of the Base-Case Scenario is at the end of the original planned future mining (Year 25) relative to the 2019 water level. The comparison of drawdown contours between Scenario 6 and the Base-Case Scenario suggests that the added potential mining (beyond the 65 years modeled) will not lead to large incremental drawdowns as the mining progresses because the mining activities occur in deep, low-K rocks. Please also see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Appendix K.7 contains the West Yost peer review of the applicant's draft technical reports. West Yost comments in the peer review were satisfactorily addressed during the preparation of the DEIR.

As stated on page 4.8-48 of the DEIR, blasting or backfilling with CPB would be conducted exclusively within the underground mine workings. Thus, any water that contacts those components would be present only within the mine workings and would be pumped out of the mine workings by the dewatering system. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The dewatering causes a low pressure area around the underground workings such that groundwater inflow is toward the mine, not from the mine toward the domestic wells. The primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. In addition, the proposed new mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. Most of the proposed additional mining, and potential exploration and expansion into new areas, would occur below depths of 1,000 feet (1,600 feet msl), a depth below the levels of the existing domestic supply wells (see Table 2-2, Itasca, 2020). The substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, is further evidence that the proposed project would not adversely affect water quality in domestic wells. As stated on page 4.8-51 of the DEIR, the proposed mining areas would primarily be at equivalent or deeper depths than the existing underground mine workings, while the potential future expansion areas all involve mining at

greater depths, typically more than 1,000 feet below the surface and deeper. At those greater depths, the hydraulic conductivity is several orders of magnitude lower than it is at the depths of the domestic supply wells, due primarily to the lack of open fractures as a result of the large pressures exerted by the overlying rock mass (i.e., the lithostatic pressure). Given that the new mining activity would occur at equivalent or greater depths than the proposed mining, there is little or no potential for the proposed mining and mining in the future expansion areas to affect the quality of the groundwater in the domestic supply wells that are completed at much shallower depths.

The comment on page 12 of Appendix K.7 referenced by the commentor is in regard to Section 4.2.2 of the EMKO Report (Appendix K.2 of the DEIR), which describes a three-step procedure used to assess potential drawdown effects in perimeter areas. The results of this three-step procedure are not used for the prediction of groundwater drawdown and impact analysis. Rather the groundwater model prepared by Itasca (see Appendix K.3 of the DEIR) is used for this prediction and analysis. Discussion of this uncertainty and the overall uncertainty of the model predictions with respect to groundwater level impacts on individual wells was provided in the final version of Appendices K.2 and K.3, as requested in the West Yost peer review (page 12 of Appendix K.7).

Response to Comment Ind 464-2

Please see Master Response 5 - Evacuation Zones. While the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, there are a few important factors to consider. First, the commenter would have other available evacuation routes, such as Idaho-Maryland Road. Second, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

The project's cumulatively considerable incremental contribution to the queue impact at Brunswick Road/Sutton Way intersection could be addressed simply by retiming the intersection, as required by Mitigation Measure 4.12-10 of the DEIR. However, because this intersection is located within the City of Grass Valley, Nevada County cannot require the City to retime the intersection. As a result, the DEIR conservatively concludes that the impact would be significant and unavoidable. However, if the City of Grass Valley agrees to retime the Brunswick Road/Sutton Way intersection, the project's incremental contribution to the cumulative queue impact would be eliminated.

Response to Comment Ind 464-3

Please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 5 - Evacuation Zones.

Individual Letter 465

From: Cecilia Reynolds
To: Idaho MMEIR
Subject: Mine Re Opening
Date: Thursday, March 31, 2022 9:36:32 AM

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Ind 465-1

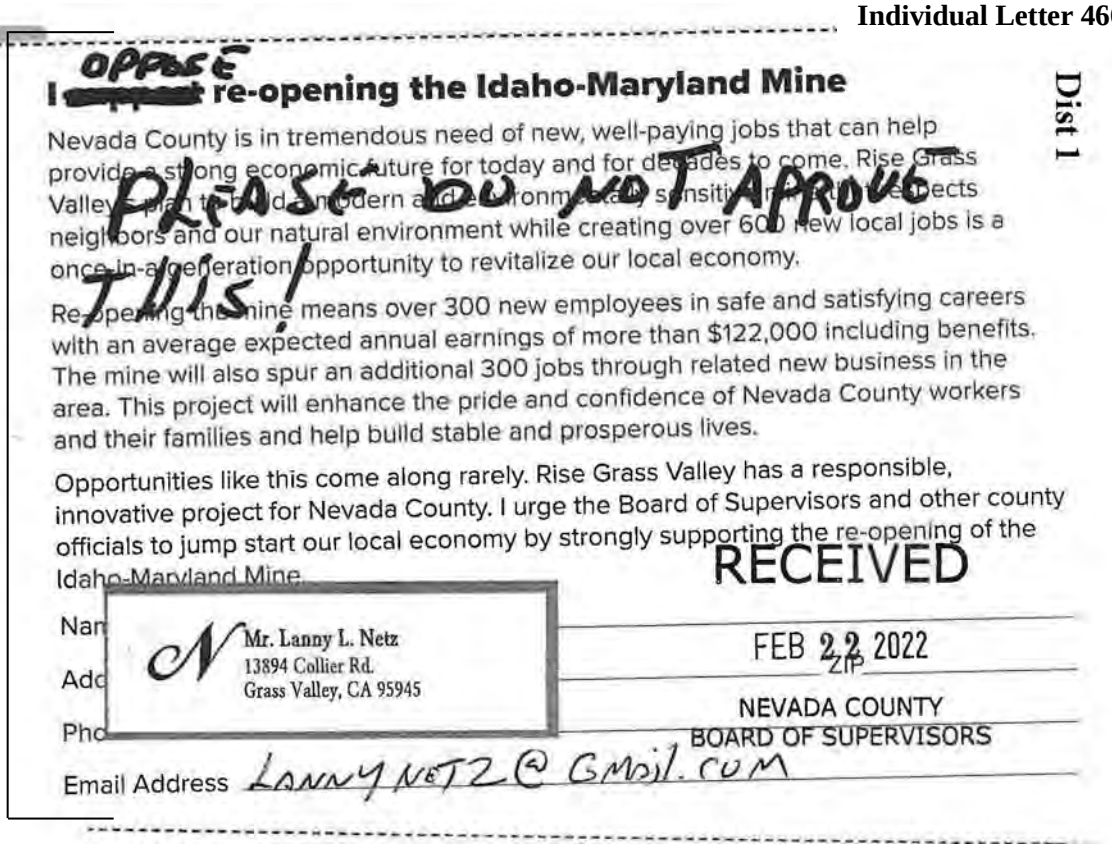
I am opposed to the Idaho Maryland Mine reopening. Our future lies in tourism, recreation and maintaining the rural quality of life for which so many of us have moved.
Promises by developers are rarely kept in full. The history of this developer is spotty and claims are not to be believed. If there is some environmental damage or disaster, what is to keep them from abandoning the project and keeping the prosecution and fining in the courts for years and years?
Do not approve this project. It is not in keeping with our community's best interests.
LaMont Reynolds

INDIVIDUAL LETTER 465: LAMONT REYNODS

Response to Comment Ind 465-1

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 466



I OPPOSE re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine protects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

PLEASE DO NOT APPROVE THIS!

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name

Address

Phone

Email Address LANNYNETZ@GMAIL.COM

Mr. Lanny L. Netz
13894 Collier Rd.
Grass Valley, CA 95945

ZIP

Ind 466-1

INDIVIDUAL LETTER 466: LANNY NETZ

Response to Comment Ind 466-1

Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 467

APR 0 1 2022
Nevada County Dev Agency CDA Fiscal

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Larik Butyrin

Address: 20205 Wolfcreek Rd. G.V. CA. 95949

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

RECEIVED
APR 01 2022
NEVADA COUNTY PLANNING DEPARTMENT

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 467-1

The E.I.R. has many flaws as pointed out by many professionals in many feilds at the meeting on March 24th and what has been written in the Union. The biggest omission in the E.I.R. is the people of this community which are the most important part of the environment here!
If the majority of the community Feels that this proposed project has a negative effect on their quality of life then there is nothing more to do other than to tell Rise Gold to GO AWAY!!! The planning dept. and our representatives have the obligation to do what the community **wants** !!! NUFF Said!!!

Larik Butyrin

INDIVIDUAL LETTER 467: LARIK BUTYRIN

Response to Comment Ind 467-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 468

From: Patsy Rieger
To: bdofsupervisors
Subject: Rise Gold proposal to reopen mine
Date: Friday, February 25, 2022 10:36:51 AM
Attachments: Scan_0002.pdf

Dist 1

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Dear Nevada County Supervisors:

Ind 468-1 Our home is located within the possible affected area, if the Idaho Maryland Mine is allowed to reopen. We have lived on this property for 35 years. We are extremely concerned about the proposal to reopen the mine because we depend solely on water provided by our well. We have seen studies showing that the mine operations propose to drain the groundwater for miles/acres including under our property located close to the Nevada County Airport.

Please take note of the devastating effects that could be put upon our residential and business community. We strongly oppose the proposal to reopen the mine.

Ind 468-2 Attached is a copy of the recently received postcard that came with misleading propaganda from Rise Gold.

Thank you for your consideration,

Larry & Patsy Rieger
13026 Madrona Lf Ct
Grass Valley CA 95945
(530) 273-1473

INDIVIDUAL LETTER 468: LARRY AND PATSY RIEGER

Response to Comment Ind 468-1

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 468-2

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 469

Nevada County Supervisors March 31, 2022

950 Maidu Avenue

Nevada City, CA 95959

To: Nevada County Board of Supervisors

From: Laura Wagner Balch and Gary Balch

Citizens of Nevada County, District 5

18286 Nubian Way

Nevada City CA 95959

To Whom it May concern:

As long-term residents of Nevada County, we are writing about our concerns about the reopening of the Idaho Maryland Mine, outside Grass Valley, Ca.

Ind 469-1 Mining helped make our community what it is today, but the mining days are over. Today, Nevada County is a home and destination for people who like the Northern California lifestyle. Today, Nevada County is a home and destination for its beautiful scenery, mostly amiable community, and its many cultural amenities.

Reopening this mine would cause considerable environmental, financial, and life-style disruptions which we cannot afford. The recent Draft Environmental Report (DEIR) raises many of these concerns and neglects others.

Ind 469-2 First, we could not find any alternative proposals for the use of this land, other than mining. We think the Board of Supervisors should consider our communities' needs for affordable housing, light industry, and parks to make this space accessible and useful to all residents.

Ind 469-3 Second, the DEIR fails in our view to adequately address the ground and waste water issues which this mine would create. California is already experiencing a drought and the mine would not only use water needed for other activities, but would negatively impact ground water in Wolf Creek, which flows beside numerous homes in Grass Valley and below. It is not clear in the report how mine waste is to be realistically dealt with, particularly with asbestos and heavy metals to be disposed of.

Ind 469-4 Third, the mine would significantly impact travel in Grass Valley and on Highway 174, where traffic is already congested. Heavy trucks with diesel emissions will impact the air and the noise will be disruptive to the quality of life for people who live in Grass Valley and the surrounds. Although a site has been identified for dumping mine waste, this will severely impact the neighborhood and it is not clear how that waste will be cleaned up and disposed of in an environmentally sensitive manner.

Ind 469-5 Fourth, the Mine Watch coalition has identified some issues in the draft DEIR which mitigate against pursuing Rise Gold's plans. Some of these include: the aesthetic impacts, air quality impacts from a moisture cloud plume, evening blasting impacts and the threat of airborne pollutants, all of which mitigate against opening this mine.

Ind 469-6

We are grateful to the County Board of Supervisors for their careful study of the prospects for reopening the Idaho Maryland mine and humbly suggest that mining of this type should occur only be considered in isolated areas where there is little impact on the quality of life of nearby residents. Instead, the Nevada County Supervisors should consider an alternative use of this site, more suitable to the needs of Nevada county in the 21st century.

Thank you for your time.

Sincerely,

Gary S. Balch at garyb@eccnc.com

Laura A. Wagner-Balch at laura.wagner.balch@outlook.com

18286 Nubian Way

Nevada City, CA 95959

INDIVIDUAL LETTER 469: LAURA BALCH

Response to Comment Ind 469-1
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 469-2
Alternatives are addressed in Chapter 6, Alternatives, of the DEIR. The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).

An alternative to the proposed mining use would not achieve any of the basic objectives of the project. Project objectives are identified starting on page 3-11 and repeated on starting on page 6-2 of the DEIR. Therefore, an alternative to the proposed mine is not required to be analyzed.

The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 469-3
Please see Master Response 16 – Drought and Climate Change. Please see Master Responses 8, 10, and 12 regarding mine waste and Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 469-4
Traffic is addressed in Chapter 4.12, Transportation, of the DEIR. Air quality and noise are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and Chapter 4.10, Noise, of the DEIR. Please see Master Responses 8 through 12 regarding mine waste. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 469-5
Please see Response to Comment 7-95. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 469-6
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 470

To: Matt Kelley, Senior Planner Nevada County Planning Department
Idaho.MMEIR@co.nevada.ca.us
Cc DEIRcomments@cea-nc.org

Ind 470-1

I am Laura Gagliasso, at 14035 Diamond Ct.,Grass Valley 95945. I am one of "the 30" well owners in District 3 who are listed as impacted by the proposed Idaho-Maryland Mine project.I have been at this property 8 years with a lifetime in the area. My husband and I are retired and on a fixed income.

Ind 470-2

These are my comments on what I consider the inadequacies of the DEIR as it pertains to my property and well.

Allowing Rise Gold to self monitor is inadequate.
There are 2 wells on the mine property. Those 2 wells plus the 30 wells should be monitored, with water quality testing, by an independent entity for 12 months BEFORE any dewatering begins in order to determine average depths and flow. A new and recent model needs to be established. What provision is there for beyond the 30…there are 300+ wells within the mining rights. Rise Gold used a 1996 model to make their predictions and, clearly, after extended drought seasons a model that is over 16 years old is inadequate.

The provision to provide water to "the 30" current property owners is inadequate. That provision should go with the property, not just the current owner or it will impact property values.

There is no true enough predictability of weather or groundwater levels and according to The Nature Conservancy, March 14, 2022, "ground water supplies nearly half the world's drinking water and supports farms that feed us." 38% of the drinking water in the USA comes from groundwater.

Ind 470-3

On February 10, 2022, at an NID meeting there was a map showing the truck route down E. Bennett Rd. to the back side of the Centennial site. I have seen no traffic study showing that usage on narrow and curvy E. Bennett Rd. Also, it showed a road cut into the Centennial site right at the very dangerous curve on E. Bennett Rd. across from the old mill. Where is the traffic study for large semi trucks using that route everyday? This is an inadequacy in the DEIR.

Ind 470-4

What if: They run a water line to my home but right now the well is fine? What if, rght now I choose not to hook up to NID and later my well fails? Why should I have to hook up beforehand? What if the well never would have failed? Predicting the future using inadequate models is inadequate. I do not want my well capped.

Ind 470-5

Finally, I would like to ask…Has anyone bothered to walk or drive UP Diamond Ct. from E. Bennett Rd…and UP is the operative word? This is a single lane private road. One owner has the land on both sides all the way UP. There are 3 properties at the top. Has anyone bothered to come UP my driveway to my home on the back corner to the property where the well is

located on the back side of the home? Again, UP is the operative word and there is no egress on either side of the driveway. It is not a simple thing to say that NID will swoop in and hook my property up to their water supply. It is inadequate of the DEIR to say so.

Thank you for your consideration of these comments concerning a project of this scope that will impact this entire community, not just 30 well owners.

Laura Gagliasso
Donald Gagliasso
14035 Diamond Ct. Grass Valley 95945
lmgagliasso@comcast.net

INDIVIDUAL LETTER 470: LAURA AND DONALD GAGLIASSO

Response to Comment Ind 470-1
The comment does not address the adequacy of the DEIR but is noted for the record.

Response to Comment Ind 470-2
Domestic water wells in the E. Bennett area are proposed to be mitigated by the installation of NID potable water. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring. The commenter asserts that self-monitoring is not acceptable but does not explain why. The County will have oversight and enforcement authority over all mitigation measures and conditions of approval.

The DEIR did not use a 1996 model to make predictions of groundwater drawdown. Please see Chapter 4.8 of the DEIR. With regard to adequacy of groundwater modeling, mitigation, and payment of water charges after sale of a property please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Regarding property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 470-3
No trucking is proposed on E. Bennett Road. Please see Figure 3-13 of the DEIR. No new roads are proposed to be constructed off of E. Bennett Road.

Response to Comment Ind 470-4
As described in the Well Mitigation Plan (Appendix K.9 of the DEIR), the applicant will close property owners' wells, using certified well drillers and under Nevada County regulations, if requested by the landowner at the time of NID connection and service to their properties. It is unlikely that the reduction in water column of wells in the E. Bennett area will make these wells unusable. Therefore, property owners may decide to retain and continue using their water wells. The applicant will not close domestic water wells in the future if property owners decline this closure at the time of NID potable water connection. A water meter will be installed at property lines and connected to homes if requested and authorized by property owner. A property owner could therefore choose to use NID potable water at any time, even if they decide to continue using their domestic water well. The Well Mitigation plan has been revised to include the installation of Double Check Valves, which will allow the use of both wells and NID potable water service (Please see Appendix D to this Final EIR). If a property owner decides to retain and continue using their water well, the cost of the well's operation, including Double Check Valve monthly fees, would be the owner's responsible and not the applicant.

Response to Comment Ind 470-5
Mitigation Measure 4-8(c) requires the engineering and permitting of the NID potable water extension prior to dewatering. Engineering details of several lateral piping to individual properties will be determined during engineering. Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) A 20-foot public utility

easement is present on three side of the commenter's property, as shown on maps submitted with the Use Permit application and available at the links below.

https://www.nevadacountyca.gov/DocumentCenter/View/33574/Pipeline-Easements-3---ADDED-392020

Individual Letter 471

From: Laura Gerhart <lalliepie@outlook.com>
Sent: Monday, April 4, 2022 7:45 AM
To: Idaho MMEIR
Subject: Idaho Mine Proposal DEIR Public Comment

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April 4, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelly,

Thank you and the Planning Department for your dedication to hearing from the general public about the potential of bringing industrial mining back to Nevada County. I am among those in strong opposition to the plan proposed by Ben Mossman and the company he represents, Rise Gold.

Ind 471-1

I own a home in one of the areas that will be most impacted by the reopening of the Idaho Maryland Mine. I have seen the DEIR and have been in on many intelligent conversations put forth by the MineWatch group regarding the inadequacies of the document. I support their requests for further study and review of the DEIR conclusions, and I am confident representatives of CEA and MineWatch have presented those far more eloquently than I could.

What I would like to add, given the history of Ben Mossman and the mining industry he represents, is that I have little faith in their commitment to fully implement the very long list of mitigations suggested in the DEIR to address the significant short and long range impacts the mine operation will impose on our community. This leaves us as citizens and tax payers to, at the very least, foot a large bill for oversight. I would like to see the final EIR estimate the costs of county oversight included as a factor. This, especially, given the already over-burdened public services in our county working on many other vital matters to keep us all safe.

Ind 471-2

Sincerely,

Laura Gerhart

Residence Address:
11010 Brunswick Dr.
Grass Valley, CA 95945

Mailing Address:
PO Box 1202
Cedar Ridge, CA 95924

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INDIVIDUAL LETTER 471: LAURA GERHART

Response to Comment Ind 471-1

The comment does not specifically address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 471-2

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 472

From: Laura LeBleu <laura.lebleu@gmail.com>
Sent: Monday, March 28, 2022 5:06 PM
To: Idaho MMEIR
Subject: Voicing opposition to Rise Gold

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Dear Planning Committee,

Ind 472-1 My husband and I are members of District Three and are both extremely concerned about the social and environmental impacts the reopening of the Idaho-Maryland mine might have upon our community. Hard rock mining is the leading source of toxic waste in America—and it has no place in a peaceful residential community whose residents would suffer from relentless noise pollution and potential exposure to toxic elements.

Ind 472-2 In my profession as a business and technology writer/editor, I spend much of my time looking into the workings of organizations, particularly as it pertains to their commitment to corporate ESG (environmental, social, governance) impacts. I am sad to report that Rise Gold is the poster child for corporate malfeasance—from reckless pollution to the overpromising of job outcomes and underreporting of environmental impacts. To let them into our community would be a grave mistake, one that could negatively affect our area for generations to come.

Ind 472-3 Thank you for taking your time to read and respond to the citizens of Nevada County. I hope you know that the vast majority of residents want nothing to do with Rise Gold—surely there are other, less potentially damaging visions for the future of our county and our kids.

Sincerely,

Laura LeBleu
John Ficarra
10653 Douglas Lane
Nevada City

--
Laura LeBleu
917.693.9683
Creative Portfolio
LinkedIn Profile

INDIVIDUAL LETTER 472: LAURA LEBLEU

Response to Comment Ind 472-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 472-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 2 and 3.

Response to Comment Ind 472-3

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 473

From: Laura Pendell <laurapendell@hotmail.com>
Sent: Monday, April 4, 2022 8:32 AM
To: Idaho MMEIR
Subject: I am against the mine

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Dear Co.Nevada.CA. US

Ind 473-1 I am against the mine. I think that in spite of what they say it would pose a serious health risk if not immediately then eventually.

Laura Pendell
14140 Hogeland Ranch Road
Penn Valley CA 95946

INDIVIDUAL LETTER 473: LAURA PENDELL

Response to Comment Ind 473-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 474

From: Lauran Bloom <lauranbloom@gmail.com>
Sent: Monday, April 4, 2022 1:52 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: No Mine

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The reopening of the mine will negatively impact the community in the following areas:

Ind 474-1 1. Location - The proposed re-opening, with its buildings that require multiple variances, is proposed in an established residential area. Not to mention it is very close to a school that is for children kindergarten through 8th grade. The mine wants to operate 24 hours a day. They will be blasting, dumping and hauling tons of rock from 6a - 10p. Residents will be unable to open their windows or enjoy the great outdoors due to the noise. The noise will make it difficult for the school to conduct classes. In addition they are not sure which way the wind will carry the dust and particles. Would you want your child inhaling this during recess?

Ind 474-2 2. Health and wellness. As noted, the proposed mine will be dumping and hauling tons of fill rock contains asbestos and silica each day. Once asbestos particles become airborne you have the danger of them being inhaled and causing Mesothelioma - a fatal asbestos lung cancer. We have no idea which way the wind will take these particles. While you may think this is just another "ambulance chaser" legal action - having watched a relative die from this disease and gasp for their last breath due to asbestos exposure at work - I can assure you this disease is no joke. This company will be exposing all our residents to this toxin. The company has also said the rocks and dirt hauled out can be used for local constructions projects. Really - what construction project is going to accept contaminated fill?

Ind 474-3 3. Water - We are in a substantial drought situation. They propose to pump out over one million gallons of ground water per day. When ground water from aquifers was depleted in Santa Clara county, they saw the ground sink as much as 13 feet in some area making the area unstable and causing damage to structures, roads and even dams. In addition depletion of ground water can impact peoples wells and make it harder for them to reach water as the water table will be lower. Many here are dependent on wells as their primary source of water. This depletion can also cause residents increased costs for treatment as the depletion of surface water can impact the quality of the remaining water. How will the depletion of water impact the health of our forests? We are already in a high risk fire area and have difficulty getting fire insurance. Any depletion of water will only make this worse.

Ind 474-4 The "treated" water will be pumped into Deer Creek. How will that affect that ecosystem? We have all see the holding ponds at the Empire Mine trying to make the water useable again and the disaster that is Lost Lake. Can we afford another Super-Fund site?

Ind 474-5 In closing, this is a foreign company who has had issues with not living up to their commitments. Who will be left holding the bag when for some reason they decide this project is not longer viable? Or, when the residents start getting sick from tainted ground water and polluted air? The damage will be done and they will be long gone. They are not the first who have tried this. Short term gains do not offset long term costs.

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Sincerely,

Lauran and Cy Rinck
Grass Valley

INDIVIDUAL LETTER 474: LAURAN AND CY RINCK

Response to Comment Ind 474-1

The commenter is concerned about the vicinity of a school to the project and the noise- and air quality-related impacts on children. The DEIR identifies the closest school to the project, which is the Montessori House of Children on The Burma Road located approximately 2,500 feet south of the Brunswick Industrial Site boundary. (DEIR, p. 4.3-62.) Sensitive receptors, including schools, are considered in the health risk assessment and impacts are less than significant after mitigation. (DEIR, p. 4.3-78.) The DEIR also found that noise-related impacts would be less than significant after mitigation, with the exception of the installation of a potable water line along East Bennett Road. (DEIR, 4.10-27, 31.)

Response to Comment Ind 474-2

The commenter is concerned that the waste rock produced by the project will release asbestos and other toxic air contaminants. The DEIR and Health Risk Assessment (Appendix E.1) evaluates asbestos and silica emissions and determined the impacts to be less than significant after mitigation. (DEIR, p. 4.3-78.) The commenter is referred to Master Response 17 - Meteorological Data Used in HRA, Master Response 18 - Air Quality Thresholds, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 474-3

The commenter is concerned that the project will impact both quantity and quality of the groundwater supplies, especially in the context of the drought. The commenter is also concerned about the impact of the project on the soil moisture which could affect vegetation. The DEIR found that the project would not significantly impact groundwater supplies and would not violate any water quality standard after mitigation. (DEIR, p. 4.8-41, 54.) The commenter is also referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, Master Response 33 - Groundwater Dependent Vegetation, and Master Response 29 - Near Surface Workings.

Regarding the impact to vegetation, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. (DEIR, p. 4.13-21.) The dewatering of mine would not, therefore, increase fire risk due to reduced groundwater levels.

Response to Comment Ind 474-4

The commenter states that treated water would be pumped into Deer Creek but is likely referencing the discharge of treated water to South Fork Wolf Creek. The DEIR found that the project would not violate any applicable water quality standard after mitigation. (DEIR, 4.8-41.) The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek

Response to Comment Ind 474-5

The commenter references the Project Applicant and is concerned about reclamation following the project. Regarding the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24.) The commenter is also referred to Appendix C (Reclamation Plan) of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Individual Letter 475

LAUREN ANDERSON / DESIGN

RE: Rise Gold

Matt Kelley
Planning Commission

Ind 475-1 I wish to express my complete opposition to the proposed mine opening ! There are so many negative impacts for our area and community with almost nothing positive. I question their job numbers. Rise doesn't have anything adequate in the EIR to mitigate the negative impacts or solutions ...and self monitoring.....with their negative past record..... Really ?

Ind 475-2 I live on he south boundary of the proposed mine off Brunswick and our Home Owners Association was told by the Engineer for "Peters Well Drilling" at the last go around with "M Gold" we would definitely lose our water"....and it would take NID about two years to get us that water with the engineering, permitting and construction work to get water to us. Can NID guarantee us water ?

Ind 475-3 I have not been able to increase the height limit by three feet for my projects... Why allow them a 165 foot exemption with a completely out of place look ! ... not to mention, allowing the change in zoning. We didn't buy our property 30 years ago here for this. Don't let this happen !

Ind 475-4 The noise is something else I must mention... We were here with the lumber mill and the sound from the trucks and the beeping of the backing up all day was horrible. I can't imagine what the loading of the trucks and truck traffic will sound like.. (up to 100 trucks from 6am to 10pm) ! and for 80 years.

This is a beautiful residential area ... Look at the "Facts" and vote no.... !

Thank You

Lauren Anderson

Lauren Anderson / Design 12940 Mink Court, Grass Valley, CA 95945 **530.273.2600**

INDIVIDUAL LETTER 475: LAUREN ANDERSON

Response to Comment Ind 475-1

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 475-2

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 475-3

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 475-4

Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 476

From: Lauren Drutz
To: Idaho MMEIR
Subject: Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR
Date: Wednesday, January 5, 2022 3:14:56 PM

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Ind 476-1

Hi Matt,

Yes I received your email. Thank you.

I have a new email address:
lau@zebradesignworks.com

I appreciate you sending the EIR info for the Idaho Mine proposal.

Sincerely,
Lauren Drutz

On Jan 5, 2022, at 1:40 PM, Idaho MMEIR <Idaho.MMEIR@co.nevada.ca.us> wrote:

Good Afternoon Lau:

Yesterday, we sent out the Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR Project to all of the email addresses that we had record of who had submitted previous comments on the proposed project. The email was bounced back and returned as undeliverable. I wanted to try sending the NOA again, to see if you are able to receive it.

The Draft EIR, Notice of Availability and other project materials are now available for public review and download on the Nevada County website at: https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley.

Thank you, and could you please let me know if you receive this email.

Thank you,

Matt Kelley

Senior Planner
<image001.jpg>
Planning Department
County of Nevada
Community Development Agency

950 Maidu Ave, Suite 170
PO Box 599002
Nevada City, CA 95959-7902

office 530.265-1423
https://www.mynevadacounty.com/512/Planning-Department

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I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

<EIR19-0001 Idaho-Maryland Mine DEIR NOA_Final.pdf>

INDIVIDUAL LETTER 476: LAUREN DRUTZ

Response to Comment Ind 476-1

The comment does not address the adequacy of the DEIR.

Individual Letter 477

From: Lauren Drutz <lau@zebradesignworks.com>
Sent: Monday, April 4, 2022 4:13 PM
To: Matt Kelley; Idaho MMEIR
Cc: deircomments@cea-nc.org
Subject: Idaho Maryland Mine Project Draft EIR comments

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Dear Mr Kelley,

I am writing to express my thoughts on the Idaho-Maryland Mine Project Draft EIR Project.

Ind 477-1

The DEIR states that "Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site" for problems from previous mining activities. These old problems have not been mitigated yet and the solutions to fixing these old problems have been linked to this DEIR. This seems quite backwards to me. The proposed Rise Gold plan to re-open the Idaho-Maryland Mine has many new environmental and health problems. Beginning a new project without first addressing and mitigating the existing problems is asking for trouble. The DEIR assumes that Rise will fix these issues sometime, and then takes an incredible leap of faith by saying that the environmental baseline for Aesthetics, Ag and Forestry Resources, Biological Resources, Hazards and Hazardous Materials and Wildfire "has been adjusted to reflect the reasonably anticipated conditions of the site following the remediation activities (CEQA Guidelines Section 15125(a))." This dangerous assumption allows prevents Rise from being held accountable for completing the VCA or doing so adequately.

Ind 477-2

Thirteen major concerns are minimized and rationalized by Rise in this DEIR.

I have commented on seven of these concerns. Following are excerpts in quotes from the DEIR, with my comments following or without quotation marks.

Aesthetics: "…the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings, or conflict with applicable zoning and other regulations governing scenic quality. Based on the above, a ***significant*** impact would occur." "…given the proposed heights of the structures and the permanent alteration of the views, the impact would remain ***significant and unavoidable.***" Apparently, the DEIR is giving Rise a pass regarding degradation of aesthetics.

Ind 477-3

With respect to light pollution, section 4.1-3, the claim "All work at the Centennial Industrial Site would be done between 6:00 AM and 10:00 PM." appears to be in conflict with Table 3-7. From my perspective, loaders, trucks and building lights would add sources of light to a site where currently none exist. These two references from the DEIR appear to be contradictory. But then the DEIR rationalizes the increase in visual degradation by saying "...the proposed project would substantially degrade the character of the Centennial and Brunswick Industrial Sites, though they are zoned for industrial development and there are surrounding industrial land uses in the vicinity of the project sites. Therefore, the project's incremental contribution to the significant cumulative impact would be ***cumulatively considerable and significant and unavoidable***." I have to disagree. This is not an unavoidable impact. The cumulative impact is occurring because

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successive projects are being approved using the same backwards logic. The DEIR could instead conclude that adding more light pollution and aesthetic degradation is not appropriate at the Rise site because it would contribute to the cumulative impact.

Ind 477-4 Figure 4.1-11 Viewpoint 6: Corner of Brunswick Rd and East Bennett Road. It appears that the Simulated Condition picture forgot that almost all of the existing and native trees are to be removed and replaced with species that a landscaper will decide as appropriate. See landscape diagram 3-17 as compared to Figure 4.1-11

Ind 477-5 Agriculture & Forestry Resources: The DEIR states "The potential loss of up to 25 acres of forest/timberland associated with the proposed project would equate to an approximately 0.0001 percent decrease in statewide timberland resources. This very small relative amount of forest/timberland loss that would result from the project is not substantial in terms of the overall resources in the state and is therefore considered less than significant for the purposes of this analysis. Once again, the DEIR reasons that such a small amount of lost forestland is not significant. Once again, I feel that I need to point out that little things, incremental acreages, small voices, all add up and make a difference, positive or negative, in the big picture.

Ind 477-6 Air Quality & Greenhouse Gas Emissions: The DEIR maintains that air quality and greenhouse gas emissions would be "less than cumulatively considerable". "The proposed project is anticipated to result in increased electricity consumption of 16,513 MWh during the year of construction and 49,613 MWh annually during operations. Reclamation activity is not anticipated to create a substantial demand for electrical power. Although the project would increase electricity demand, the increased demand is not anticipated to conflict with PG&E's ability to meet the RPS requirements." And "As mentioned above, global climate change is, by nature, a cumulative impact." The DEIR also states "There is already a trend in Nevada County regarding increased energy efficiency. According to the Nevada County EAP, since 2010, Nevada County residents and businesses have saved 13,034,571 kWh of electricity and 163,282 therms of natural gas annually from PG&E energy efficiency programs including Nevada City and Grass Valley customers.[47] Increased efficiency will be ensured in the future as cumulative development occurs due to compliance with the State's robust energy efficiency requirements. For example, the 2019 CBSC has begun phasing in Zero Net Energy requirements by requiring residential projects to meet 100% of their electricity needs through rooftop solar. Cumulative residential development would include rooftop solar to meet 100% of each project's electricity demand. In addition, pursuant to 2019 CBSC, new non-residential buildings associated with cumulative development are also required to be solar ready."

"Based on the above, implementation of the project in combination with other cumulative development would not result in the wasteful or inefficient use of energy. Because the project would not conflict with a local plan to increase energy efficiency and reduce energy consumption, a ***less-than-significant*** impact would occur."

Ind 477-7 The DEIR points to positive "cumulative development" benefits of adopting energy efficient electricity sources within Nevada County, yet Rise has no part in contributing towards this goal! Instead, the DEIR points out that Rise will add to electricity demand.

Ind 477-8 The DEIR contradicts itself, stating "...global climate change is, by nature, a cumulative impact" and "....the project would increase electricity demand...." Then the DEIR calls them "less-than-significant" and provides a path for these negative impacts to be ignored.

Ind 477-9 Hydrology and Water Quality: "The Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings." The DEIR ignores mega-drought and climate change in California. Water is scarce and not reliable. DEIR claims about water availability are not reality based. The claim that Rise will be buying water from NID is merely a hope and if there is any water to buy from NID or pump from aquifers, Rise Gold will be competing with existing local communities and businesses who are scaling back now due to drought and climate change.

Ind 477-10 Noise and Vibration: Please see Table 3-7 "Hours of Operation" on page 3-37.

It is disingenuous to claim that noise and/or vibration from the mine and its transport vehicles can be mitigated when mine operations are running 24/7 and trucks are hauling 7 days a week from 6AM to 10PM for 80 years, initial

2

dewatering is occurring 24/7 for 6 months (what about post-initial dewatering?), underground exploration/mining is happening 24/7 for 7 days a week for 80 years and outside truck loading is going on 7AM-7PM 7 days a week for 80 years.

Ind 477-11

Transportation: "The average transport of engineered fill would be 1,000 tons per day or 365,000 tons per year. A maximum transport rate of up to 2,000 tons of engineered fill per day is required to make up for periodic weather or operational delays. Truck payloads would be approximately 20 tons per truck and, therefore, would require up to 100 trips per day and an average of 50 trips per day."

Negative impacts to our county include wear and tear on roads, exhaust pollution, increased traffic and broken windshields from haul trucks, dangerous conditions for local drivers as haul trucks enter and leave Rise sites throughout the day, extra chaos for emergency vehicles especially during fire season.

Ind 477-12

Wildfire: "In the event of an evacuation order in the vicinity of the proposed mine, such as an evacuation of residents off of Greenhorn Road, the incident command center would contact dispatch and direct them to contact the mine and request the mine operator to shut down the mine and cease all truck hauling operations.[6] While Brunswick Road is not a primary evacuation route, it would be the evacuation route used by residents of the Greenhorn Road area to evacuate to the primary evacuation route of SR 49/20." Again, the DEIR has minimized the impact of Rise's operations on local residents during or in anticipation of an emergency evacuation.

Ind 477-13

"Overall, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas.[10] The dewatering would not, therefore, increase fire risk due to reduced groundwater levels." The forgoing statement is not taking into account drought and climate change. The DEIR is assuming adequate river and stream flows. However, this is not a given. The DEIR needs to include comprehensive and current data on groundwater, climate change and drought and refrain from discounting quality of life and safety issues for Nevada County residents.

Ind 477-14

"With limited exception, none of the infrastructure improvements would be expected to exacerbate wildfire risk. One exception is the extension of the overhead power line along Brunswick Road that would be extended onto the Brunswick Industrial Site, which would have the potential to exacerbate wildfire risk if the line comes in contact with tree limbs or other overhanging vegetation." Our community and California in general have experienced many fires resulting from power line ignitions. If Rise is serious about fire safety, they would put new power lines underground.

Ind 477-15

No consideration has been given to the proximity of Nevada County's air attack base on Loma Rica Drive to the Rise Gold Brunswick site. It is less than 1.5 miles away (as a plane flies). I think that this issue has been ignored with respect to first Standards of Significance 4.13.4. "Consistent with Appendix G of the CEQA Guidelines, Section XX. Wildfire, determination of significant impacts related to wildfire is based on whether the proposed project would result in the following, if located in or near state responsibility areas or lands classified as very high FHSZs:

- Substantially impair an adopted emergency response plan or emergency evacuation plan."

Ind 477-16

Two lengthy paragraphs describing the fire-fighting resources at the Grass Valley Air Attack base are included by the DEIR but no remarks about how a conflagration at a Rise site could negatively impact fire-fighting aircraft due to smoke or from issues with stored or in-use explosives at the Rise facilities. The air attack base is an incredible resource for our community and Northern California. It needs to be accounted for by the DEIR.

3

To write this letter, I have read through hundreds of pages of DEIR documents. It is obvious to me that most of the DEIR is weighted heavily on hopeful scenarios and assumptions so that Rise can push their project through the Planning Department.

Ind 477-17 The term "cumulative impact" has been misused throughout this DEIR. Apparently, only positive cumulative impacts are applicable to Rise, while negative cumulative impacts are allowed to be ignored or trivialized. Logic of this type discredits the DEIR document.

Thank you for your consideration.

Lauren Drutz

INDIVIDUAL LETTER 477: LAUREN DRUTZ

Response to Comment Ind 477-1
The commenter states that the DEIR establishes an incorrect baseline by assuming the Centennial Industrial Site cleanup project will be completed. Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 477-2
The commenter states that the DEIR is "giving a pass" to the Project Applicant regarding aesthetic impacts, which were determined to be significant and unavoidable. A "significant and unavoidable impact" simply means that the DEIR has determined that a particular impact cannot be mitigated (or mitigation measures were infeasible) to a less than significant level. (DEIR, p. 5-9.) CEQA requires that the DEIR identifies significant and unavoidable impacts so that a lead agency is informed and can decide whether or not to approve a project, despite the significant and unavoidable impacts. (CEQA Guidelines § 15093.) The DEIR compiles all of the project's significant and unavoidable impacts in Section 5.6.

Response to Comment Ind 477-3
The commenter states that the DEIR contradicts itself with regard to light pollution. As shown in Table 3-7 of the DEIR, off-site hauling of engineered fill would be from the hours of 6:00 AM to 10:00 PM and placement, grading, and compaction of engineered fill would take place from the hours of 7:00 AM to 3:30 PM. Therefore, there is no conflict with Section 4.1-3 of the DEIR. As discussed in this section of the DEIR, the significance threshold is the creation of a new source of substantial light of glare which would adversely affect day or nighttime views. The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less-than-significant impact would occur.

As discussed in Section 4.1-4 of the DEIR, the project would create long-term changes in visual character associated with the proposed project in combination with cumulative development. The project's incremental contribution to this significant cumulative impact is cumulatively considerable and significant and unavoidable. As discussed in Section 4.1-5 of the DEIR, creation of new sources of light or glare associated with the proposed project in combination with cumulative development is less than cumulatively considerable.

Response to Comment Ind 477-4
The commenter states that one of the DEIR's simulated vantage points (DEIR, p. 4.1-38, Viewpoint 6) fails to mention that all existing vegetation would be removed and replaced. Existing trees and vegetation in the northeast corner of the Brunswick site are not proposed to be removed by the project. The commenter is referred to Figure 4.4-10 of the DEIR.

Response to Comment Ind 477-5
The commenter states that the DEIR understates the impact of from loss of acreage. The commenter is referred to Section 4.2-4 of the DEIR which explains how the significance of the project's impact to cumulative loss of forest land or conversion of forest land to non-forest use was determined.

Response to Comment Ind 477-6
The commenter provides excepts from Chapter 4.3 of the DEIR. The comment is noted.

Response to Comment Ind 477-7

The commenter states that the project would not contribute to energy efficiency goals within the County. The commenter is referred Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 477-8

The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 477-9

The commenter states that the DEIR ignores the current drought conditions. The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 477-10

The commenter states that the noise and vibration impacts cannot be mitigated to less than significant but provides no additional detail. The DEIR discusses noise and vibration impacts from the project in Chapter 4.10. Noise impact determination pursuant to CEQA is based on measurable thresholds established by the jurisdiction. The project noise analysis contained in Chapter 4.10 of the DEIR appropriately determined impact significance by comparing the project's estimated noise levels against the County's numerical noise thresholds. While this approach may not satisfy the commenter, it is the legally required approach under CEQA. As stated in CEQA Guidelines Section 15064.7:

> (a) A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.

Specifically, for the topic of noise, Appendix G of the CEQA Guidelines identifies the following thresholds:

> a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
>
> b) Generation of excessive groundborne vibration or groundborne noise levels?
>
> c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the above-listed thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure

4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Response to Comment Ind 477-11

The commenter states that traffic-related impacts will damage roadways and increase emissions, but does not state how the DEIR is inadequate in assessing these impacts. The DEIR discusses the traffic impacts of trucks, including impacts to pavement, in Chapter 4.12. Truck emissions are discussed in Chapter 4.8. The commenter also states that the project would impede an evacuation during an emergency. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 477-12

The commenter quotes from the DEIR and states that it minimizes the project's impacts on local residents during an emergency evaluation. However, the commenter does not provide any additional information regarding the adequacy of the DEIR on which to formulate a specific response. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 477-13

The commenter states that the DEIR does not consider climate change in connection to the project's impacts to private groundwater wells. The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 477-14

The commenter states that the DEIR should consider undergrounding a power line to abate fire risk. Mitigation Measure 4.13-2 requires a Vegetation Management Plan, including trimming of vegetation within specified horizontal distances from roadways and overhead power line(s), the latter of which may be implemented by PG&E as the service provider, consistent with clearance requirements in Public Resources Code Sections 4292 and 4293. Undergrounding the power line is not necessary because Mitigation Measure 4.13-2 reduces the impact to less than significant.

Response to Comment Ind 477-15

The commenter states that the project would impair the Nevada County air attack base. However, the commenter does not state how the project would impact the air attack base. The commenter is referred to Response to Comment Ind 477-16.

Response to Comment Ind 477-16

The commenter states that a fire at the project site would produce smoke that could interfere with operations at the Grass Valley air attack base. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or

economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 477-17

The commenter states that cumulative impacts are ignored or trivialized in the DEIR. Responses to specific comments have been provided above.

Individual Letter 478

March 22, 2022

We are writing to express our objection to the reopening of the Idaho- Maryland mine. We ask that you reject the proposal from Rise corporation. Nothing is to be gained for our community from their project.

Ind 478-1 We moved to Nevada County in 1988 and love this community. We were certainly aware of the area's mining history and enjoy the quaint celebrations of that fact.... people in period costumes, the tossing of the pasties and the connections to Cornwall etc. Nevada County's mining legacy is something which is charming only because it remains in the past and is thankfully no longer a current reality. We have learned more and more about mining's toxic legacy and destruction. The re-opening of any mine, even with modern technology, is full of risk and is no benefit to our community.

Ind 478-2 Hundreds of truck trips per day will increasingly pollute our air and, as you know, we can not afford to add more air pollution to our already poor air quality throughout much of the summer. Noise pollution will increase with mine activity and trucking. Water issues will be greatly impacted by mining needs. The Rise Corporation has a history of leaving toxic mess and not fulfilling obligations to clean up. There are too many unknown health impacts from this project.

Ind 478-3 We recognize that you are attracted by business and promise of job creation. However, we reject the notion that this is the way to achieve those goals. You only have to look at Truckee to see how tourism and recreational businesses will improve our economy and way of life. Support the creation of bike trails, attract more eco- businesses, develop a nature center or a museum. Continue to attract alternative energy companies and high tech businesses. That's how to increase jobs and tax revenue and also improve our communities. Mining will be a deterrent to any tourist, retiree, or remote worker.

Ind 478-4 Property values will plummet. Who wants to visit or reside in an area full of noise and air pollution? Who wants to move to a community that may have depleted or polluted water and possible contaminated soil?

Ind 478-5 We urge you to reject this project.

Thank you for your attention,

Laurie and Philip DesJardins

PO Box 2102 Nevada City CA 95959

INDIVIDUAL LETTER 478: LAURIE DESJARDINS

Response to Comment Ind 478-1
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 478-2
Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR as well as in Master Responses 17 through 24. Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. Please see Master Responses 13 through 15 regarding groundwater. Please also see Master Responses 1 and 3. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 478-3
The comment does not address the adequacy of the DEIR. Please see Master Response 2.

Response to Comment Ind 478-4
The comment does not address the adequacy of the DEIR. Please see Master Response 2.

Response to Comment Ind 478-5
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 479

Laurie Dahm Segal
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ldahmsegal@acsrdl.

March 27, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

Dear Mr. Kelley,

I am a resident of Nevada City that was forced to evacuate my home during the Jones Fire. I have reviewed the DEIR for re-opening the Idaho-Maryland Mine and am very concerned about the GHG emissions that will be generated during the life of the project. Regarding Chapter 4.3 Air, Quality, Greenhouse Gas Emissions, and Energy I submit the following comment.

The DEIR proposes the use of Carbon Offsets in offsetting the project's construction GHG emissions.

Ind 479-1

4.3-7(b) Carbon Offsets – Construction Emissions. Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling 2,345 MT CO2e, which was calculated by subtracting 1,100 MT CO2e (threshold) from the construction emissions generated by the project.

I have the following comment to the proposed mitigation technique:

The California cap-and-trade policy is under review. Therefore, the proposed mitigation is in a state of flux. A second net-zero mitigation plan is warranted.

"*In January (2021), the program (cap-and-trade) entered a new phase that adds new requirements through 2030. These include doubling the rate at which the emissions cap drops and adding a price ceiling for credits to prevent costs for industries from increasing past a certain point.*" *(2)*

"California climate policy is already failing to reduce planet-warming emissions fast enough to meet the state's 2030 targets".(1) The cap-and-trade program "might be too weak to achieve California's ambitious climate goals". Therefore, hearings are taking place to determine "the extent to which the state's climate strategy should rely on the cap-and-trade program reductions relative to other approaches." (2)

"The cap-and-trade system in California was a pioneering initiative when it was established in 2013. But its goals look relatively modest next to the net-zero climate commitments being adopted by a growing number of states and businesses." (3)

1) https://calmatters.org/commentary/my-turn/2021/03/cap-and-trade-offsets-at-a-crossroads-in-californias-climate-policy/
2) https://www.kqed.org/science/1972789/california-says-it-will-review-cap-and-trade-amid-growing-criticism
3) https://www.eenews.net/articles/price-hike-marks-new-era-for-calif-cap-and-trade/

Sincerely,

Laurie Dahm Segal

INDIVIDUAL LETTER 479: LAURIE SEGAL

Response to Comment Ind 479-1

The project would not be a covered entity under the State's Cap-and-Trade program, as described in the California Air Resources Board's *Cap-and-Trade Instructional Guidance*[3] (2012):

> Starting in 2012, major GHG-emitting sources, such as electricity generation (including imports), and large stationary sources (e.g., refineries, cement production facilities, oil and gas production facilities, glass manufacturing facilities, and food processing plants) that emit more than 25,000 MT CO_2e per year will have to comply with the Cap-and-Trade Program. The program expands in 2015 to include fuel distributors (natural gas and propane fuel providers and transportation fuel providers) to address emissions from transportation fuels, and from combustion of other fossil fuels not directly covered at large sources in the program's initial phase.

In addition, per the California Air Resources Board's *Draft 2022 Scoping Plan, Appendix D – Local Actions*:

> Over the years, agencies and courts have provided direction and guidance regarding GHG mitigation. Nevertheless, given the variety of potential projects and mitigation scenarios, some uncertainty and misconceptions persist. For example, when lead agencies consider offsite GHG mitigation (including offsets), they may sometimes conflate the requirements for compliance-grade offsets in California's Cap-and-Trade regulation with the requirements for GHG mitigation measures under CEQA. The Cap-and-Trade regulation requires that compliance offsets meet certain regulatory criteria, which specify that compliance offsets must be real, additional, quantifiable, permanent, verifiable, and enforceable. In general, the State's Cap-and-Trade Program restricts compliance offsets from being used for any purpose other than Cap-and-Trade compliance, including being used as mitigation under CEQA [emphasis added].

The project does not emit 10,000 MT of CO_2e per year and is not subject to the Mandatory Reporting Regulation since it does not result in more than 25,000 MT CO_2e per year. See CARB regulations for the mandatory reporting of GHG emissions on page 4.3-29 of the DEIR. The project is not a covered entity under Cap-and-Trade, and therefore Cap-and-Trade offsets cannot be used as mitigation for the project.

The commenter suggests that the project should purchase offsets such that the lifetime emissions would be net zero. However, there is no requirement that a project reduce greenhouse gas emissions to net zero. Notably, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27, GHG Thresholds). These thresholds are based on annual GHG emissions, rather than life cycle emissions of a project, which the commenter suggests the project's impacts should have been evaluated on. However, life cycle emissions are not required to be assessed under CEQA (please see Master Response 26, Life Cycle GHG Emissions). Since the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required. CEQA does not have a requirement for a project to mitigate beyond the threshold.

[3] https://ww2.arb.ca.gov/sites/default/files/cap-and-trade/guidance/chapter1.pdf

In addition, the project's GHG inventory in the DEIR makes conservative assumptions for GHG emissions over the life of the project. As shown in Table 22 of Appendix E.1, for the Year 2033 to 2102 Scenario, PG&E supplied electricity makes up the majority (51%) of GHG emissions from the project at 4,636 metric tons. GHG emissions from electricity are calculated based on an intensity factor of 204 pounds per MWh. These values will decrease over time due to the Renewable Portfolio Standard but were used for all scenarios as a conservative estimate (see page 347 of Appendix E.2). On-road vehicles – Off-Site makes up a large part (35%) of GHG emissions from the project at 3,123 metric tons. These emissions are primarily generated by haul trucks which are assumed to deliver engineered fill at an average distance of 60 miles (see page 246 of Appendix E.2). As heavy trucks and passenger vehicles are eventually transitioned to battery-electric vehicles under State policy, these emissions will likely be less than assumed in future years.

Individual Letter 480

Laurie Dahm Segal
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ldahmsegal@acsrdl.

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902 (530) 265-1423

March 27, 2022

Dear Mr. Kelley,

I am a resident of Nevada City that was forced to evacuate my home during the Jones Fire. I have reviewed the DEIR for re-opening the Idaho-Maryland Mine and am very concerned about the GHG emissions that will be generated during the life of the project. Regarding Chapter 4.3 Air, Quality, Greenhouse Gas Emissions, and Energy I submit the following comment.

DEIR ***Table 4.3-23 Estimated Annual Greenhouse Gas Emissions (Metric Tons) Year 2033 to 2102 – Mining, Brunswick Industrial Site Operations, Fill Placement at Off-Site Location*** provides an entry of **9,041.23** of **Total Annual Emissions (Metric Tons)**. *The GHG Threshold used is* ***10,000****. Additionally, a* ***No*** *is provided in assessing Significance (Yes/No)?*

My comment is two-fold

Ind 480-1

1) 10,000 MT CO2e per year is the quantitative threshold used by SMAQMD, PCAPCD, BAAQMD and SCAQMD as sited in the four bullets on *DEIR Page 4.3-42/43*. The 10,000 MT CO2e per year threshold is based on the CEQA Guide December 2009, Revised November 2014, May 2015, April 2020[1],

   CEQA revisions coincide with updates from the CARBs' Climate Change Scoping Plan. *The 2017 Scoping Plan serves as the framework for reaching targets established by SB 32 – that emissions be 40 percent below 1990 levels by 2030. This is needed to keep California on a trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80 percent below 1990 levels by 2050 as set forth in EO S-3-05 (DEIR Page 4.3-28).*

   Targets have not been set for beyond 2050, therefore a conclusion that the Significance is **No** for years 2051 – 2102 should not be assumed. In fact, *"California climate policy is already failing to reduce planet-warming emissions fast enough to meet the state's 2030 targets".*[2] Workshops are currently being

held as CARB prepares its' 2022 Scoping plan for achieving carbon neutrality by 2045.[3]

https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf[1]

https://calmatters.org/commentary/my-turn/2021/03/cap-and-trade-offsets-at-a-crossroads-in-californias-climate-policy/[2]

https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan[3]

Ind 480-2

2) **Sixty-seven** years of being >90% of GHG target emissions for a project should be considered **Significant**. Nevada County, located in the MCAB, is already experiencing extreme effects of climate change as documented in the three bullet points on *DEIR Page 4.3.16.*

The IPCC Sixth Assessment Report (28 February 2022)[3] implores that urgent action is required to deal with increasing risks. *Hoesung Lee states that "It (the report) emphasizes the **urgency of immediate and more ambitious action** to address climate risks. Half measures are no longer an option."* Approving a project that increases GHG emissions for the next 67 years in Nevada County will only accelerate the affects of climate change already being experienced - higher temperatures, less water, more fires, etc.

https://www.ipcc.ch/report/ar6/wg2/resources/press/press-release/[3]

Sincerely,

Laurie Dahm Segal

INDIVIDUAL LETTER 480: LAURIE SEGAL

Response to Comment Ind 480-1

The commenter states that the DEIR should not assume a less than significant impact for project years beyond 2050 because GHG emission reduction targets have not been set beyond year 2050, and that California policies are failing to meet GHG emission reduction targets for 2030. As GHG emission reduction targets for years subsequent to 2050 have not yet been established in California, the DEIR cannot compare the project to those targets and any analysis based on hypothetical targets would be mere speculation. CEQA does not require an EIR to analyze speculative impacts. (see CEQA Guidelines Section 15384.)

Notably, the lead agency has determined that the threshold of significance for the project is 1,100 MT CO_2e per year for construction and 10,000 MT CO_2e per year for operations, based on substantial evidence provided in the DEIR (please see Master Response 27, Greenhouse Gas Thresholds). Since the project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less than significant level. For operations, the GHG emissions do not exceed the applied threshold during any of the years of activity and therefore, no mitigation was required. CEQA does not have a requirement for a project to mitigate beyond the threshold.

In addition, the project's GHG inventory in the DEIR makes conservative assumptions for GHG emissions over the life of the project. As shown in Table 22 of Appendix E.1, for the Year 2033 to 2102 Scenario, PG&E supplied electricity makes up the majority (51%) of GHG emissions from the project at 4,636 metric tons. GHG emissions from electricity are calculated based on an intensity factor of 204 pounds per MWh. These values will decrease over time due to the Renewable Portfolio Standard but were used for all scenarios as a conservative estimate (see page 347 of Appendix E.2). On-road vehicles – Off-Site makes up a large part (35%) of GHG emissions from the project at 3,123 metric tons. These emissions are primarily generated by haul trucks which are assumed to deliver engineered fill at an average distance of 60 miles (see page 246 of Appendix E.2). As heavy trucks and passenger vehicles are eventually transitioned to battery-electric vehicles, these emissions will likely be less than assumed in future years. Likewise, any changes in California law or regulation that are subsequently approved to meet new targets developed for post-2050 emission reduction targets would be applied to the project where applicable; however, those changes are speculative and cannot be accurately analyzed in the DEIR.

Response to Comment Ind 480-2

The commenter asserts that the project's operational GHG emissions should be considered significant because they are over 90% of the applicable threshold. Impacts are considered significant when they exceed the applicable threshold, and the project's operational GHG emissions do not exceed the threshold selected by the County, based on substantial evidence. As such, the project's operational GHG emissions are considered less than significant. Please see Master Response 27 - Greenhouse Gas Thresholds, and see Response to Comment Ind 480-1.

Individual Letter 481

From: Karin Wheatley <kwheatley18@gmail.com>
Sent: Monday, April 4, 2022 7:49 AM
To: Idaho MMEIR
Subject: Fwd: Letter

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

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---------- Forwarded message ---------
From: **Bob Wheatley** <robertwheatley1099@gmail.com>
Date: Sat, Apr 2, 2022, 8:16 PM
Subject: Letter
To: Karin Wheatley <kwheatley18@gmail.com>

10591 Salcido Lane

Grass Valley

916.432.0409 (Call/Text)

Dear Mr. Kelly

Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report

I am writing as a co-owner, with my three sisters, the property at 10591 Salcido Lane to express my concern on aspects of this project.

Ind 481-1 I am particularly concerned at the content of tables 4.4-5 and 4.4-6 which omit flora, fauna and avian species identified at the recent hearing and also, where identified substantially understate the potential.

The "on foot" surveys were conducted during the winter and summer seasons but no surveys were taken in the spring and autumn seasons therefore omitting two very significant seasons for the observation of seasonal flora, fauna and migratory avian species. This omission requires that "on-foot" surveys for the omitted seasons be undertaken and included in a revised issue or the report.

Yours faithfully,

Lea K. Wheatley

1

INDIVIDUAL LETTER 481: LEA WHEATLEY

Response to Comment Ind 481-1

The commenter identifies concerns with flora, fauna, and migratory birds not identified in the DEIR, but does not specifically state which species. In addition, the commenter questions the timing of surveys. Please see Master Response 31 - Rare Plants and Master Response 37 - Birds and Raptors.

Individual Letter 482

We oppose.

~~I support~~ re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a ~~modern and environmentally sensitive~~ mine ~~that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.~~ is a potential disaster

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Not likely to happen

OAR current residents.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials ~~to jump start our local economy by strongly supporting~~ the re-opening of the Idaho-Maryland Mine.

vote against

Name(s) Len & Debbie Schneider

Address 10864 Old Pond Lane ZIP 95949

Phone 530-268-3386

Email Address debsch1086@gmail.com

Ind 482-1

INDIVIDUAL LETTER 482: LEN AND DEBBIE SCHNEIDER

Response to Comment Ind 482-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 483

March 25, 2022

Matt Kelley, Senior Planner

950 Maidu Ave. Suite 170

Nevada City, CA 95959

Dear Matt,

Ind 483-1 We have been following the proposal to reopen the Idaho Maryland Mine on Brunswick Road in Grass Valley, including attending the public Supervisor's meeting on March 24th. When my husband and I moved to Nevada County, we were alarmed by all the disclosures that we were required to acknowledge before purchasing our home on Lee Lane. The area had obviously been riddled with toxic practices stemming from the mid 1800's forward. We felt grateful that the land, trees and water were in the process of being restored to a healthy environment. Then we learned of the proposed reopening of mines in the area that threaten to continue polluting this beautiful land for the same reason it was so devastatingly destroyed more than a century ago, and continuing to be allowed into the late 20th century.

Ind 483-2 Hearing the various issues that were addressed on March 24th in reference to the DIER we were alarmed that if the Rise Corporation were allowed to open the Idaho Maryland mine, that there would be blasting of underground tunnels, threatening the homeowners that rely on private wells by potentially striking water bearing fractures and dewatering or contaminating local wells, air quality issues of which we are struggling with already, sound pollution, and many more issues that could change our community for the unforeseeable future.

Ind 483-3 There have been many lessons learned about the devastating effects from mining that need to be remembered in order to protect our entire area. Simply walking in Empire Mine State Historic Park and seeing how many areas are still too toxic to be open to the public is a huge red flag as to how devastating this practice is, whether the operations are above ground or below.

Ind 483-4 Property values will be impacted tremendously if the pollution of truck traffic, the safety of our roads with the hauling of rock and mining debris, the noise of blasting, the inevitable public health issues of toxic metals being released into the aquifers are allowed, sacrificing the beauty of our natural environment for a proposed 80 years only for a few additional jobs and tax revenue. It's too great of a risk to take. Instead, we need to heal the devastating effects of the past mining operations, creating a healthy environment for those of us that have been born here or have migrated here for a better and healthier life.

Thank you for rejecting the proposed mine opening, promoting and sustaining the health of this beautiful land and its residents both now and in the future.

Sincerely,

Letitia and Robert Jacobs

Letitia and Robert Jacobs

13584 Lee Lane, Nevada City, CA

95959

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 483: LETITIA AND ROBERT JACOBS

Response to Comment Ind 483-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 483-2

The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 483-3

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 483-4

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 484



Nevada County Planning Commission Date: 950 Maidu Avenue, Suite 170
Nevada City, CA, 95959 1/29/20

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

January 23, 2022

Ind 484-1 I have lived in Nevada County now for over 50 years. I raised my family here and retired from high school teaching in 2006 to run NCTV for 6 years. I helped broadcast your government meetings and have working with most of the non-profits in the community and served on many of their boards and well as working with County staff. In other words, I have seen many changes here and respect the work of many contributors. I have a long-standing interest in our community and oppose the approval of Rise Gold's proposed mine for the various reasons;

Ind 484-2 1. Follow the history of extractive industries both here and elsewhere. They leave a dismal legacy.

Ind 484-3 2. Nevada County has left its industry of mining and has moved on to recreation, tourism and now lumber/forest/water management.

Ind 484-4 3. The jobs that Rise Gold promises are not needed as we already have a shortage of workers and timber/forest management will provide a lifetime of opportunities for employment along with service and construction industries. For example, due to the recent storm, I have large, downed trees. The tree services here are backed up and say it will be 3 months before they can remove them.

Ind 484-5 4. The storm also left me without power for 12 days. PG&E will have its hands full providing both summer and winter support, providing jobs.

Ind 484-6 5. The power and water footprint of the proposed mine will make huge demands when our environment cannot absorb these impacts, as well as accompanying health issues due to air pollution.

Ind 484-7 6. Just the amount of trucking going through town will create a huge impact on air, noise and traffic congestion.

Ind 484-8 Finally, when we stand back and look at our county and its future, we need to ask ourselves the question, what are our priorities? Do we want to return to a heavy industrial base and give up the quality of life that brings people here both to live and recreate?

You can approve the proposal and anticipate years of litigation of disapprove the proposal and be done with it, so we can get on with our lives.

Thank you for your patience. I wish you wisdom in your decision.

Lew Sitzer, lewsitzer@yahoo.com, 530-913-3210

10560 Whispering Oaks Lane, Nevada City, CA. 95959

Lew Sitzer

INDIVIDUAL LETTER 484: LEW SITZER

Response to Comment Ind 484-1
The comment is an introductory statement expressing opposition to the proposed project and does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 484-2
The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 484-3
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 484-4
The comment does not address the adequacy of the DEIR. Please see Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 484-5
The comment does not address the adequacy of the DEIR.

Response to Comment Ind 484-6
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 484-7
Please see Master Response 1 – Non-EIR/Administrative Issues. The commenter expresses general concerns regarding the impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 484-8
Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 485

Dist 1 RECEIVED

FEB 01 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors Date: 950 Maidu Avenue, Suite 200
Nevada City, CA, 95959 1/24/20

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

January 23, 2022

Ind 485-1 I have lived in Nevada County now for over 50 years. I raised my family here and retired from high school teaching in 2006 to run NCTV for 6 years. I helped broadcast your meetings and have working with most of the non-profits in the community and served on many of their boards and well as working with County staff. In other words, I have seen many changes here and respect the work of many contributors. I have a long-standing interest in our community and oppose the approval of Rise Gold's proposed mine for the various reasons;

Ind 485-2 1. Follow the history of extractive industries both here and elsewhere. They leave a dismal legacy.

Ind 485-3 2. Nevada County has left its industry of mining and has moved on to recreation, tourism and now lumber/forest/water management.

Ind 485-4 3. The jobs that Rise Gold promises are not needed as we already have a shortage of workers and timber/forest management will provide a lifetime of opportunities for employment along with service and construction industries. For example, due to the recent storm, I have large, downed trees. The tree services here are backed up and say it will be 3 months before they can remove them.

Ind 485-5 4. The storm also left me without power for 12 days. PG&E will have its hands full providing both summer and winter support, providing jobs.

Ind 485-6 5. The power and water footprint of the proposed mine will make huge demands when our environment cannot absorb these impacts, as well as accompanying health issues due to air pollution.

Ind 485-7 6. Just the amount of trucking going through town will create a huge impact on air, noise and traffic congestion.

Ind 485-8 Finally, when we stand back and look at our county and its future, we need to ask ourselves the question, what are our priorities? Do we want to return to a heavy industrial base and give up the quality of life that brings people here both to live and recreate?

You can approve the proposal and anticipate years of litigation or disapprove the proposal and be done with it, so we can get on with our lives.

Thank you for your patience. I wish you wisdom in your decision.

Lew Sitzer, lewsitzer@yahoo.com, 530-913-3210

10560 Whispering Oaks Lane, Nevada City, CA. 95959

Lew Sitzer

INDIVIDUAL LETTER 485: LEW SITZER

Response to Comment Ind 485-1
See Response to Comment Ind 484-1.

Response to Comment Ind 485-2
See Response to Comment Ind 484-2.

Response to Comment Ind 485-3
See Response to Comment Ind 484-3.

Response to Comment Ind 485-4
See Response to Comment Ind 484-4.

Response to Comment Ind 485-5
See Response to Comment Ind 484-5.

Response to Comment Ind 485-6
See Response to Comment Ind 484-6.

Response to Comment Ind 485-7
See Response to Comment Ind 484-7.

Response to Comment Ind 485-8
See Response to Comment Ind 484-8.

Individual Letter 486

Liese Greensfelder
18977 Wepa Way. Nevada City, CA 95959
tel. (530) 292-4248
lieseg@nasw.org

April 4, 2022
Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Ave., Suite 170
Nevada City, CA 95959
Idaho.MMEIR#co.nevada.ca.us

Re: adequacy of DEIR Idaho-Maryland Mine Project

Dear Matt Kelley,

After reviewing the **Hydrology** and Water Quality chapter of the DEIR for the Idaho-Maryland Mine Project, I'm astonished by the sparsity of data on which the DEIR bases its conclusions. Below I address just one of those.

The DEIR has used a groundwater hydrology model that assumes that the geology over the 2,585 acre project site is homogeneous.

Ind 486-1

I was one of the leaders of the cooperative effort from 1992 to 1997 between the San Juan Ridge Taxpayers Association (SJRTA) and Siskon Gold Corporation to craft a mining project that would have the least possible impact on surrounding communities. Over objections from our association, the EIR for that project based its hydrology analysis on the conclusion that:

> "Numerous studies have been conducted on the surface and ground water hydrology at the project site, and the data are voluminous … (that) Two separate groundwater systems occur under the project site." And that "The bedrock is a *confined* groundwater system." (my italics)

Thus, according to that EIR analysis, there was no connection between the project area and wells surrounding that area.

Yet 17 months after project commencement, tunnel excavations intercepted a large groundwater fracture that dewatered some 12 wells, some of them several miles from the tunnel itself.

This example, from the *initial stages* of the project, that is, before the proposed 3-mile-tunnel was less than a mile long, provides an object lesson and warning that a geological model that assume homogeneity cannot adequately address the complex geology of 2,585 subsurface acres.

Noise: I've read the Salter Report Acoustical Review of the DEIR Noise and Vibration section of the DEIR, and am alarmed by its finding that the DEIR underestimates certain noise levels by 10 to 18 dB.

A 10 decibel increase is perceived as a doubling of sound, and a 20 decibel increase is perceived as a quadrupling. So the Salter Report is extremely concerning. And these discrepancies must be addressed.

Ind 486-2

The neighborhood in the vicinity of the Idaho-Maryland project area is blessed with low ambient noise levels, especially nighttime noise levels, as was the area surrounding the Siskon Mine.

Our experience with the Siskon Mine was that nighttime operations just within the mouth of the tunnel and outside the mouth were far higher than the EIR had predicted. And although they only occasionally exceeded county nighttime standards, residents of households situated on a hillside as far as two miles from the tunnel mouth reported project noise from equipment, generators and fans that greatly increased their normal nighttime noise environmental, with a concomitant decrease in their quality of life.

I'd like to conclude by saying that I've read CEA's report on the DEIR, and am in agreement with all of the areas of inadequacy that the report details.

Thank you for your attention to my concerns.

Sincerely,
Liese Greensfelder

INDIVIDUAL LETTER 486: LIESE GREENSFELDER

Response to Comment Ind 486-1

Please see Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 486-2

Please see Response to Comment Grp 7-39 and 7-40.

Individual Letter 487

March 31, 2022

16910 Cooper Road
Nevada City, California 95959

Matt Kelley
Nevada City Planning Department
950 Maidu Avenue Suite 170
Nevada City, California 95959

Dear Mr. Kelley:

Ind 487-1 I oppose the application for the opening of a gold mile proposed by the Idaho-Marilyn Mine Project. Many objections have been submitted by citizens of this county that pointed out the flaws in the environmental impact report prepared by the Rise Gold applicants. I agree that the impact report is highly distorted.

I strongly oppose any proposal which would impact water supply and quality, noise and air quality.

Sincerely,

Lilly Grenz

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 487: LILLY GRENZ

Response to Comment Ind 487-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 488

From: Lily Marie <lilymarie@infostations.com>
Sent: Tuesday, March 29, 2022 8:31 AM
To: Idaho MMEIR
Subject: Idaho Marilyn Mine EIR Comments

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3-29-2022

To: Matt Kelley, Nevada County Planning Dept.

Nevada County Planning Commission

Nevada County Board of Supervisors

950 Maidu Ave.

Nevada City, CA 95959

From: Lily Marie Mora

11683 Alta Vista Ave.

Grass Valley, CA 95945

Re: Rise Grass Valley, Inc.—EIR –I am opposed to the mine for many good reasons.

Dear County Staff, Planning Commission Members and Supervisorial Board Members:

Ind 488-1

I have been working to review the EIR findings and have come to the conclusion that Rise Grass Valley, Inc.'s time to be in business in Nevada County has come and gone. The regulatory (government) intervention that will be needed to make this company operate within environmental, health and safety standards in this populated area will be astronomical.

1

Who will pay for all these watch dogs to make sure this company operates legally, as it already has a terrible track-record of bankruptcy, unfinished environmental clean-up in Canada and unpaid employees from its last mining fiasco?

I have lived in Nevada County all my life, 66years. I have had family members involved in all aspects of mining, up until the Siskon Mine, another Canadian company, that opened on the North San Juan ridge in the early 1990's. It all sounded great in the beginning, but soon became a huge environment catastrophe. A lot of the private property wells went dry and/or became contaminated, and the school still buys bottled water. Our county government sold out our kids, and their future for the promise of big money and a few jobs.

The areas of the EIR that I am the most concerned about are the Size of the Mine, Clean Drinking Water availability, Maintaining Healthy Air Quality Standards, the Mitigation Measures and the possible bias of an EIR that was paid for by Rise Grass Valley, Inc.

I will list some of my many concerns:

1.) The location and size of the site and underground footprint of the mineral rights—

(Aprox. 2,585 acres)

Ind 488-2

- Most people in the county have been getting their information about this project through articles in the Union newspaper.

  It has only been from reading this EIR that I understood the true size, scope and area of the mineral rights footprint, which poses a great risk to many landowners, businesses and our local Airport *(now used for year around fire suppression)*.

  It seems that a more direct comprehensive notification plan to educate these stakeholders would be necessary to evaluate the real support for and viability of this project.

  Rise Grass Valley, Inc.'s flashy mailers don't come close to explaining the possible risks involved with the proposed mining operation. The flyers appear to be more divisive than informative.

  Will there be an Emergency Fund put up by Rise Grass Valley, Inc., and held by the County of Nevada to handle any and all of the possible problems that will come up in the next 80yrs.?

2.) Water Issues and Mitigation Measures:

Ind 488-3

- The Sysckon mine project let us all know that the wells in the area are at risk,

- Pg. 4.3-49, 2nd Paragraph of the EIR, I learned about Surface Fugitive Dust Control.

  "The modeling assumes that, during construction, NID-supplied water would be required for dust suppression. The NID-supplied water would result in associated indirect GHG emissions. For the assessment, it was assumed that about 11 million gallons total would be required for construction dust suppression."

It seems that the people compiling this EIR are not educated about water use rules and regulations that are put in place during drought conditions.

On Feb. 9, 2022 and on April 28, 2021--NID-Nevada Irrigation District Board of Directors passed resolutions to implement Stage 1 of the Water Storage Contingency Plan.

Visit: www.nid.com/water-shortage-stages See: Table Stage 1-- 10%Supply Shortages for summary.

1. Treated Water and Municipal Customers are 1st on that list

2. Agriculture Customers are 2nd

(Being part of a ranching family, we have already been dealing directly with these restrictions during the drought.)

3. District Actions- is 3rd on the list

- Declare no new or increased surplus availability.

The State of CA Water Resources Board and NID have obviously realized the need to prioritize water usage to have enough clean water to drink and to grow healthy food to eat; dust control has not even been mentioned on the list.

Ind 488-4

This 11million gallons of NID water will be greatly needed for fire suppression, which has become a year around job during the drought.

This is a great error in the calculation of mitigation measures in this EIR.

3.) Air Quality, Greenhouse Gas Emissions and Energy Issues and Mitigation Measures:

- See various Tables:

Ind 488-5

Construction Off Road Equipment and On Road On Site Vehicle Trip Assumptions.

Diesel is the fuel mentioned to be used the most in all phases of the development process. Equipment will be running 1hr. to 24hrs per day depending on the equipment needed for the task. Even when electricity is mentioned as the fuel type, it does not mention how the electricity will be generated. Much of our electricity comes from hydroelectric power plants, which require a lot of rain and snow. What happens during a drought? If the public is in competition for the same electrical supply, won't our utility bills increase?

3

Ind 488-6 Also, I didn't find how the Mitigation Measures would address the air quality during "Year Around Fire Season." You don't need to be an environmental scientist to know that the Air Quality meets fair to very unhealthy standards during these times.

Ind 488-7 I didn't see addressed how Rise Grass Valley, Inc would handle their 24 hr./7day a week operations during a PG& E "black out" due to hazardous fire conditions. It would seem that they would need to use their back-up generators to supply the needed electricity, which are diesel powered, adding even more pollution to our unhealthy air.

Ind 488-8 The air quality testing in this area seemed extremely lacking, as one of the test sites used was in Yuba City, CA located many miles away from the mine site.

So, that makes the mitigation measures at best misleading and the amount of mitigation measures needed to manage everything from the "Health Risks of Mining to the Reduction of Emissions" are daunting.

Ind 488-9 **4.) Wildfire Issues and Mitigation Measures –**

- Figure 4.13-1, both the Centennial and Brunswick Industrial Sites are located on lands classified as being within a "Very High Fire Hazard Severity Zone."

Ind 488-10

- The EIR section on Prevailing Winds and Fire History are indicating that the southwesterly wind patterns can cause fire to burn through the mine site. In August 2021, the Bennett Fire did burn 59 acres of the Centennial Industrial site.

Ind 488-11

- Earlier in the EIR, it was mentioned that there would be 2-12,000 gallon diesel fuel tanks locate at the mine site. What safety measures will be taken to keep these tanks from burning or exploding in a fire and/or leaking, if they are installed underground?

Ind 488-12

- Public Safety Shutoffs—Will the mine shut down during these emergencies or will their power use take precedence over other users?

Ind 488-13

- How will evacuation routes, like Bennett St. and Idaho Marilyn Rd. be use during a forest fire, if they are clogged with mine truck traffic?

Ind 488-14

- These concerns highlight the difficulties of having a mining operation in a developed community.

When peoples' lives are on the line that is "significant" and that cannot be mitigated to "less significant."

Ind 488-15 There are a couple of old sayings that come to mind, "The man who does not learn the lessons of history is domed to repeat them" and "All that glitters is not gold" is another.

So, as we all move forward to assess the real risks and benefits of this project, let us move into the mindset of "Ourstory." Will we court businesses that are fraught with problems from the beginning or will we choose businesses that benefit our entire community and our future generations.

In conclusion, I found the Mitigation Measures to be simplistic and short sited. I know you need to look at the merits of this project as described in the EIR, but as you deliberate to voter to approve or deny this project, think what if it was located near your home / well or local business? Put yourself and your family in the shoes of the individuals and families that will be directly affected by this mine. You represent all of us and our families, not big corporate interests from another country.

Many thanks to all of you for your time, consideration and hard work to evaluate this most complicated issue.

Sincerely,

Lily Marie Mora

INDIVIDUAL LETTER 488: LILY MARIE

Response to Comment Ind 488-1
This comment is introductory in nature. The commenter opposes the project and references the Project Applicant's reputation. The commenter's opposition to the project is noted for the decisionmakers. The commenter is also referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 488-2
The commenter is concerned about a number of resource areas impacted by the mine, but is primarily concerned with the scope of the mineral rights boundary and implies that the Project Applicant will conduct underground mining to the extent of that boundary. The commenter is referred to Master Response 7 - Location of Future Mining Areas. Regarding the various resource areas mentioned by the commenter, the DEIR provides analysis of the project's impacts and proposes numerous mitigation measures. The commenter is referred to Chapter 4 of the DEIR. Regarding the media associated with the project, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 488-3
The commenter states that project's water consumption for dust suppression would violate NID drought plans for water shortages. The commenter does not specifically identify what NID rules and regulations the project would violate or how the DEIR is inadequate. The DEIR found that impacts to water supply during normal, dry, and multiple dry years would be less than significant. (DEIR, 4.11-35.) The commenter is also referred to the project's Water Supply Assessment, Appendix N of the DEIR.

Response to Comment Ind 488-4
The commenter reiterates concerns regarding the project's water consumption. The commenter is referred to Appendix N of the DEIR, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 488-5
The commenter states that the project's energy consumption is inappropriate in light of the drought and it would raise the utility bills of others in the community. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project, PG&E has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. Regarding utility bills, the commenter is referred to Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 488-6
The commenter states that the DEIR does not account for air quality impacts due to wildfire but does not state how the DEIR is inadequate. The commenter is referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 488-7
The commenter states that the DEIR fails to discuss how the project would operate during a power outage. As stated on page 58 of Appendix E.1, the Stationary Engine ATCM allows owners and operators of emergency standby engines to use those engines to provide electrical power when a facility experiences the loss of normal electrical service that is beyond the reasonable control of the facility. Electrical service loss resulting from Public Safety Power Shutoff events is beyond the reasonable control of back-up engine owners and operators, and therefore, appropriately-

permitted emergency standby engines may be operated to provide electrical power during such an event pursuant to the Stationary Engine ATCM.

Air emissions from use of emergency generators are provided on pages 3.3-103 to 4.3-104 of the DEIR. Although maximum daily emissions have been estimated, the ultimate number of days per year the generators would operate cannot be known with certainty. Because the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in the DEIR are for informational purposes only. Finally, it is important to note that while the use of emergency generators during power-outages such as PSPSs is outside of the scope of CEQA, the regular use of generators for routine maintenance and testing has been considered throughout the entirety of the analysis of the chapter, as such use is not speculative.

Response to Comment Ind 488-8

The commenter questions the selection of ambient air quality monitoring stations summarized in the "Local Air Quality Monitoring" section of the DEIR, Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The ambient criteria air pollutant data are presented for context and are used to determine the NSAQMD's compliance with the AAQS and to set applicable thresholds of significance. Therefore, they are not directly relevant to the analysis of the impacts from the project to criteria air pollutants. Significance determinations in the DEIR are based on comparison to the NSAQMD thresholds, which were developed based on compliance with AAQS. Further, the NSAQMD reviewed all versions of the Air Quality and Greenhouse Gas Technical Report (included as Appendix E.1 in the DEIR) and did not identify issues regarding the ambient air monitoring stations selected.

Response to Comment Ind 488-9

The commenter references Figure 4.13-1, which identifies the project sites as being located in Very High Fire Hazard Severity Zones. The comment is noted.

Response to Comment Ind 488-10

The commenter references the "Prevailing Winds" paragraph on DEIR page 4.13-3. The commenter is noted.

Response to Comment Ind 488-11

The commenter asks what safety measures will be taken for the fuel tanks installed at the Brunswick site and whether they will be stored underground. Fuel tanks are not proposed to be installed underground. As stated on page 4.13-24 of the DEIR, the project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site. The tanks would be located in the industrial building complex area, away from existing and proposed vegetation. Diesel fuel is considered a Class II liquid, and as such, the tanks would be regulated in accordance with Chapter 23 of the California Fire Code (CFC). Chapter 23 of the CFC includes robust design requirements for above-ground fuel storage tanks to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. Compliance with CFC requirements, as determined by the Fire Marshall's Office, at time of improvement plan review, would reduce fire hazards related to on-site fuel storage tanks.

Response to Comment Ind 488-12

The commenter asks if the project would consume electricity during a Public Safety Power Shutoff when electricity is turned off. The Project Applicant does not control Public Safety Power Shutoffs. In such an event the project may use its onsite backup power generators.

Response to Comment Ind 488-13

The commenter asks how the project would impact an evacuation during an emergency. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 488-14

This comment does pertain to the adequacy of the DEIR. Responses to specific comments are provided above.

Response to Comment Ind 488-15

The commenter opposes the project. Responses to specific comments are provided above. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 489

From: Linda Boswell
To: bdofsupervisors
Subject: Fw: Rise Gold , Company That Wants to Re-open Idaho Maryland Mine
Date: Friday, February 25, 2022 3:07:11 PM

Dist 1

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Ind 489-1

Dear Supervisors,

Do you all really think this is a good idea for our community??
What's in it for you personally?
Do any of you live in the impacted area? Bet you don't.

Please seriously give this fiasco some thought, and choose wisely for us all..
Blessings,
Linda

Subject: Rise Gold , Company That Wants to Re-open Idaho Maryland Mine

https://www.minewatchnc.org/post/rise-gold-shouldn-t-be-trusted-here-s-why?fbclid=IwAR1JleDTz1vPDuJp2pLv646K1hmeixXr2Le7fC6zsbp-eLY94U9IDaLOMuE

INDIVIDUAL LETTER 489: LINDA BOSWELL

Response to Comment Ind 489-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 490

From: Linda Carlson
To: Idaho MMEIR
Subject: Letter Re The Idaho-Maryland Mine reopening
Date: Saturday, April 2, 2022 11:06:26 AM

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Dept.
950 Maidu Ave, Suite 170
Nevada City, CA 95959

Dear Mr Kelley,

Ind 490-1 I am writing you to protest the reopening of the Idaho-Maryland Mine.
My name is Linda Carlson and I moved up to Grass Valley from Sunnyvale after I retired 5 years ago.
I had lived in the Bay Area for over 50 years. However during that time the area
became more crowded and that caused more pollution. So I moved up here and I live in an apartment a mile way from the mine.

Ind 490-2 I am concerned about air and water pollution along with traffic congestion in our area.
And I don't believe the hype. I don't believe the miners are going to be paid $95,000 a year and that the company would protect their workers or stop pollution the mining would create.
It's my understanding that Rise Gold Corp is headquartered in Canada. That's along way from Grass Valley and their people would not be living here and would not experience any adverse reaction resulting from working the mine.

Ind 490-3 Plus CEO Ben Mossman lost his last company through bankruptcy and I understand he is still facing criminal charges.
Also, why are there not any California companies interested in reopening the mine?
I know you are very busy and I trust you will have the safety of the people currently living here foremost in your mind.

Sincerely,
Linda Carlson
530/205-0018

Sent from my iPad

INDIVIDUAL LETTER 490: LINDA CARLSON

Response to Comment Ind 490-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 490-2

The commenter expresses general concerns regarding air, water pollution, and traffic associated with the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 490-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 491

From: Linda
To: bdofsupervisors
Subject: Vote against Rise Gold mine
Date: Tuesday, March 22, 2022 11:14:22 AM

Dist 1

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Ind 491-1

Dear Supervisors,
Please do not allow this operation to come in to our Western Nevada County cherished sphere of residence, community and Commerce.

Please explore many other ways to approach suitable jobs and so forth for us.

I believe this operation will not enhance our community but will rather degrade it. Mitigations often fall apart down the road after there bowed after their promised.

I am a resident and property owner in Nevada City for 20 years. And a California resident for much more.

Thank you,
Linda Cohen
14520 Alderwood Way
Nevada City, Ca

INDIVIDUAL LETTER 491: LINDA COHEN

Response to Comment Ind 491-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 492

From: Linda Ennis
To: Idaho MMEIR
Date: Wednesday, February 16, 2022 5:20:00 PM

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Ind 492-1

We are against New Rise coming into our county. They blew it in Canada, who's to say they won't make the same mistakes here. Not to mention the added traffic, damaged roads from all the heavy loads, the NOISE, property values declining, WATER POLLUTION, peace and quiet for that residential neighborhood, need I go on. And when they go bankrupt and skip town, which they will, we will be stuck cleaning up their mess. This man is a fraud, send him back to where he came from, we don't need that kind of business any longer. PLEASE VOTE NO. Thank you, Linda Ennis

INDIVIDUAL LETTER 492: LINDA ENNIS

Response to Comment Ind 492-1

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 493

From: Linda Fillion <lindafillion843@gmail.com>
Sent: Thursday, March 31, 2022 11:39 AM
To: Idaho MMEIR
Subject: Draft Environmental Impact Report

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To Whom It May Concern:

Please read and take seriously the comments by the CEA Foundation (Community Environmental Advocates Foundation) as regards the Draft Environmental Impact Report for the proposed reopening of the Idaho-Maryland Mine.

https://yubanet.com/regional/cea-foundation-significant-flaws-in-the-deir-for-the-proposed-reopening-of-idaho-maryland-mine/

Ind 493-1

Like most others in Western Nevada County I am against the mine's reopening because of the extensive damage it will do to the town of Grass Valley and hence to Nevada County. The damage costs will far exceed any profits realized by the mine.

Thank you for your consideration.

Linda Fillion
757 Uren Street
Nevada City,
CA 95959

1

INDIVIDUAL LETTER 493: LINDA FILLION

Response to Comment Ind 493-1

The comment cites concurrence with CEA Foundation's comments on the adequacy of the DEIR. CEA Foundation's comment letters are addressed in responses to Group Letter 6, 7, and 8. Please also see Master Responses 1 and 2.

Individual Letter 494

From: Sunny Lyons <sunnylyons@yahoo.com>
Sent: Saturday, March 19, 2022 12:29 PM
To: Idaho MMEIR
Subject: RISE Mine

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To Whom it May Concern:

Ind 494-1 I am writing to express my extreme concerns about the Rise gold project reopening of the mine. Not only do they have a very poor track record, but they are also being disingenuous about the impact reopening the mine would thrust upon our community.

Ind 494-2 Please vote NO on the mine to protect our already frail and essential water supply. Your NO vote will also protect the community from other mining pollution, noise and traffic.

Ind 494-3 Please vote in favor of supporting our community, not a greedy and sketchy company coming in to reap profits at our expense.

Thank you,
Linda Howe

INDIVIDUAL LETTER 494: LINDA HOWE

Response to Comment Ind 494-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 494-2

Please see Master Responses 13 through 15 regarding groundwater. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 494-3

Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 495

March 21, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617



Re: Preliminary Environmental Impact Report
Rise Gold Idaho Maryland Mine reopening study
Grass Valley, California

Dear Mr. Kelley:

Ind 495-1 In the following, we set forth our concerns for sufficient study that will result in identified mitigation measures that can be incorporated in an approval of the reopening of the Idaho Maryland Mine proposal:

As proposed for operation, there will be significant detrimental impact on nearby and surrounding properties as a direct result of projected increased traffic impacts (truck traffic), audible noise from operations and trucks, degradation of air quality, potential loss of water wells from proposed mine dewatering, hazardous waste disposal and remediation, just to identify just a few.

Ind 495-2 Under California real estate disclosure statutes, a Seller is required to disclose all known detrimental property conditions to a Buyer.[1] Unquestionably, the above cited potential impacts on nearby properties will require disclosure and will most certainly result in diminution or loss in property value.[2]

Ind 495-3 We would ask that the proposed environmental impact report study sufficiently study and quantify the economic impact on real estate values within the geographic region that can be reasonably projected to be impacted by the proposed reopening of the Idaho Maryland Mine.

Respectfully submitted,

Linda R. Ketcham

Daniel R. Ketcham
11693 Brunswick Pines Road
Grass Valley, CA 95945

Cc. Community Environmental Advocates

1. See California Association of Realtors 1) Real Estate Transfer Disclosure Statement (TDS 12/21) as required by CA Civil Code §1102 et seq; see paragraph C line 11; 2) Seller Property Questionnaire (SPQ 12/21); see paragraph 6. line D& E and paragraph 16, line A; 3) Seller Vacant Land Questionnaire; see paragraph 11 A, and 15 E & D.
2. Source: Randall Bell, MAI, "Real Estate Damages - Applied Economic and Detrimental Conditions", *Appraisal Institute*, 2008, 2nd Edition.

CALIFORNIA ASSOCIATION OF REALTORS®

REAL ESTATE TRANSFER DISCLOSURE STATEMENT
(CALIFORNIA CIVIL CODE § 1102, ET SEQ.)
(C.A.R. Form TDS, Revised 12/21)

THIS DISCLOSURE STATEMENT CONCERNS THE REAL PROPERTY SITUATED IN THE CITY OF _____ *County* _____, COUNTY OF _____, STATE OF CALIFORNIA, DESCRIBED AS _____ *, CA* _____.

THIS STATEMENT IS A DISCLOSURE OF THE CONDITION OF THE ABOVE DESCRIBED PROPERTY IN COMPLIANCE WITH SECTION 1102 OF THE CIVIL CODE AS OF (date) _____. IT IS NOT A WARRANTY OF ANY KIND BY THE SELLER(S) OR ANY AGENT(S) REPRESENTING ANY PRINCIPAL(S) IN THIS TRANSACTION, AND IS NOT A SUBSTITUTE FOR ANY INSPECTIONS OR WARRANTIES THE PRINCIPAL(S) MAY WISH TO OBTAIN.

I. COORDINATION WITH OTHER DISCLOSURE FORMS

This Real Estate Transfer Disclosure Statement is made pursuant to Section 1102 of the Civil Code. Other statutes require disclosures, depending upon the details of the particular real estate transaction (for example: special study zone and purchase-money liens on residential property).

Substituted Disclosures: The following disclosures and other disclosures required by law, including the Natural Hazard Disclosure Report/Statement that may include airport annoyances, earthquake, fire, flood, or special assessment information, have or will be made in connection with this real estate transfer, and are intended to satisfy the disclosure obligations on this form, where the subject matter is the same:

☐ Inspection reports completed pursuant to the contract of sale or receipt for deposit.
☐ Additional inspection reports or disclosures: _____

☐ *No substituted disclosures for this transfer.*

II. SELLER'S INFORMATION

The Seller discloses the following information with the knowledge that even though this is not a warranty, prospective Buyers may rely on this information in deciding whether and on what terms to purchase the subject property. Seller hereby authorizes any agent(s) representing any principal(s) in this transaction to provide a copy of this statement to any person or entity in connection with any actual or anticipated sale of the property.

THE FOLLOWING ARE REPRESENTATIONS MADE BY THE SELLER(S) AND ARE NOT THE REPRESENTATIONS OF THE AGENT(S), IF ANY. THIS INFORMATION IS A DISCLOSURE AND IS NOT INTENDED TO BE PART OF ANY CONTRACT BETWEEN THE BUYER AND SELLER.

Seller ☐ is ☐ is not occupying the property.

A. The subject property has the items checked below: *

☐ Range	☐ Wall/Window Air Conditioning	☐ Pool:
☐ Oven	☐ Sprinklers	☐ Child Resistant Barrier
☐ Microwave	☐ Public Sewer System	☐ Pool/Spa Heater:
☐ Dishwasher	☐ Septic Tank	☐ Gas ☐ Solar ☐ Electric
☐ Trash Compactor	☐ Sump Pump	☐ Water Heater:
☐ Garbage Disposal	☐ Water Softener	☐ Gas ☐ Solar ☐ Electric
☐ Washer/Dryer Hookups	☐ Patio/Decking	☒ Water Supply:
☐ Rain Gutters	☐ Built-in Barbecue	☐ City ☒ Well
☐ Burglar Alarms	☐ Gazebo	☐ Private Utility or
☐ Carbon Monoxide Device(s)	☐ Security Gate(s)	Other _____
☐ Smoke Detector(s)	☐ Garage:	☐ Gas Supply:
☐ Fire Alarm	☐ Attached ☐ Not Attached	☐ Utility ☐ Bottled (Tank)
☐ TV Antenna	☐ Carport	☐ Window Screens
☐ Satellite Dish	☐ Automatic Garage Door Opener(s)	☐ Window Security Bars
☐ Intercom	☐ Number Remote Controls ____	☐ Quick Release Mechanism on
☐ Central Heating	☐ Sauna	Bedroom Windows
☐ Central Air Conditioning	☐ Hot Tub/Spa:	☐ Water-Conserving Plumbing Fixtures
☐ Evaporator Cooler(s)	☐ Locking Safety Cover	

Exhaust Fan(s) in _____ 220 Volt Wiring in _____ Fireplace(s) in _____
☐ Gas Starter _____ ☐ Roof(s): Type: _____ Age: _____ (approx.)
☐ Other: _____

Are there, to the best of your (Seller's) knowledge, any of the above that are not in operating condition? ☐ Yes ☐ No. If yes, then describe. (Attach additional sheets if necessary): _____

(*see note on page 2)

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Property Address: _ _ _

Property Address: _____ CA _____ Date: _____

Seller certifies that the information herein is true and correct to the best of the Seller's knowledge as of the date signed by the Seller.

Seller _____ _____ Date _____
Ida Mae *ustee*

Seller _____ _____ Date _____
Jan *ustee*

III. AGENT'S INSPECTION DISCLOSURE

(To be completed only if the Seller is represented by an agent in this transaction.)

THE UNDERSIGNED, BASED ON THE ABOVE INQUIRY OF THE SELLER(S) AS TO THE CONDITION OF THE PROPERTY AND BASED ON A REASONABLY COMPETENT AND DILIGENT VISUAL INSPECTION OF THE ACCESSIBLE AREAS OF THE PROPERTY IN CONJUNCTION WITH THAT INQUIRY, STATES THE FOLLOWING:

☐ See attached Agent Visual Inspection Disclosure (AVID Form)
☐ Agent notes no items for disclosure.
☐ Agent notes the following items: _____

Agent (Broker Representing Seller) ***DANIEL KETCHAM & ASSOC*** (Please Print) By _____ (Associate Licensee or Broker Signature) Date _____
DANIEL KETCHAM

IV. AGENT'S INSPECTION DISCLOSURE

(To be completed only if the agent who has obtained the offer is other than the agent above.)

THE UNDERSIGNED, BASED ON A REASONABLY COMPETENT AND DILIGENT VISUAL INSPECTION OF THE ACCESSIBLE AREAS OF THE PROPERTY, STATES THE FOLLOWING:

☐ See attached Agent Visual Inspection Disclosure (AVID Form)
☐ Agent notes no items for disclosure.
☐ Agent notes the following items: _____

Agent (Broker Obtaining the Offer) ***KETCHAM & ASSOC.,DANIEL R.*** (Please Print) By _____ (Associate Licensee or Broker Signature) Date _____
Daniel Ketcham

V. BUYER(S) AND SELLER(S) MAY WISH TO OBTAIN PROFESSIONAL ADVICE AND/OR INSPECTIONS OF THE PROPERTY AND TO PROVIDE FOR APPROPRIATE PROVISIONS IN A CONTRACT BETWEEN BUYER AND SELLER(S) WITH RESPECT TO ANY ADVICE/INSPECTIONS/DEFECTS.

I/WE ACKNOWLEDGE RECEIPT OF A COPY OF THIS STATEMENT.

Seller _____ Date _____ Buyer _____ Date _____
Trustee *Laird*

Seller _____ Date _____ Buyer _____ Date _____
Jan Chicoine, Trustee

Agent (Broker Representing Seller) ***DANIEL KETCHAM & ASSOC*** (Please Print) By _____ (Associate Licensee or Broker Signature) Date _____
DANIEL KETCHAM

Agent (Broker Obtaining the Offer) ***KETCHAM & ASSOC.,DANIEL R.*** (Please Print) By _____ (Associate Licensee or Broker Signature) Date _____
Daniel Ketcham

SECTION 1102.3 OF THE CIVIL CODE PROVIDES A BUYER WITH THE RIGHT TO RESCIND A PURCHASE CONTRACT FOR AT LEAST THREE DAYS AFTER THE DELIVERY OF THIS DISCLOSURE IF DELIVERY OCCURS AFTER THE SIGNING OF AN OFFER TO PURCHASE. IF YOU WISH TO RESCIND THE CONTRACT, YOU MUST ACT WITHIN THE PRESCRIBED PERIOD.

A REAL ESTATE BROKER IS QUALIFIED TO ADVISE ON REAL ESTATE. IF YOU DESIRE LEGAL ADVICE, CONSULT YOUR ATTORNEY.

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CALIFORNIA ASSOCIATION OF REALTORS®

SELLER PROPERTY QUESTIONNAIRE

(C.A.R. Form SPQ, Revised 12/21)

This form is not a substitute for the Real Estate Transfer Disclosure Statement (TDS). It is used by the Seller to provide additional information when a TDS is completed. If Seller is exempt from completing a TDS, Seller should complete an Exempt Seller Disclosure (C.A.R. Form ESD) or may use this form instead:

NOTE TO SELLER: YOU ARE STRONGLY ADVISED TO CAREFULLY REVIEW THE DISCLOSURE INFORMATION ADVISORY (C.A.R. Form DIA) BEFORE YOU COMPLETE THIS SELLER PROPERTY QUESTIONNAIRE. ALL SELLERS OF CALIFORNIA REAL PROPERTY ARE REQUIRED TO PROVIDE VARIOUS DISCLOSURES, EITHER BY CONTRACT, OR BY STATUTE OR CASE LAW. MANY DISCLOSURES MUST BE MADE WITHIN CERTAIN TIME LIMITS. TIMELY AND THOROUGH DISCLOSURES HELP TO REDUCE DISPUTES AND FACILITATE A SMOOTH SALES TRANSACTION.

Seller makes the following disclosures with regard to the real property or manufactured home described as ***Hill Lane*** _____, Assessor's Parcel No. _____, situated in ***County***, County of _____, California ("Property").

1. **Disclosure Limitation: The following are representations made by the Seller and are not the representations of the Agent(s), if any. This disclosure statement is not a warranty of any kind by the Seller or any agents(s) and is not a substitute for any inspections or warranties the principal(s) may wish to obtain. This disclosure is not intended to be part of the contract between Buyer and Seller. Unless otherwise specified in writing, Broker and any real estate licensee or other person working with or through Broker has not verified information provided by Seller. A real estate broker is qualified to advise on real estate transactions. If Seller or Buyer desires legal advice, they should consult an attorney.**
2. **Note to Seller, PURPOSE:** To tell the Buyer about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
   - Answer based on actual knowledge and recollection at this time.
   - Something that you do not consider material or significant may be perceived differently by a Buyer.
   - Think about what you would want to know if you were buying the Property today.
   - Read the questions carefully and take your time.
   - If you do not understand how to answer a question, or what to disclose or how to make a disclosure in response to a question, whether on this form or a TDS, you should consult a real estate attorney in California of your choosing. A broker cannot answer the questions for you or advise you on the legal sufficiency of any answers or disclosures you provide.
3. **Note to Buyer, PURPOSE:** To give you more information about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
   - Something that may be material or significant to you may not be perceived the same way by the Seller.
   - If something is important to you, be sure to put your concerns and questions in writing (C.A.R. form BMI).
   - Sellers can only disclose what they actually know. Seller may not know about all material or significant items.
   - Seller's disclosures are not a substitute for your own investigations, personal judgments or common sense.
4. **SELLER AWARENESS: For each statement below, answer the question "Are you (Seller) aware of..." by checking either "Yes" or "No." There is no time limitation unless otherwise specified. Explain any "Yes" answers in the space provided or attach additional comments and check paragraph 19.**
5. **DOCUMENTS:** **ARE YOU (SELLER) AWARE OF...**
   Reports, inspections, disclosures, warranties, maintenance recommendations, estimates, studies, surveys or other documents (whether prepared in the past or present, including any previous transaction), pertaining to **(i)** the condition or repair of the Property or any improvement on this Property in the past, now or proposed; or **(ii)** easements, encroachments or boundary disputes affecting the Property whether oral or in writing and whether or not provided to the Seller..... ☐ Yes ☐ No
   Note: If yes, provide any such documents in your possession to Buyer.
   Explanation: _____
6. **STATUTORILY OR CONTRACTUALLY REQUIRED OR RELATED:** **ARE YOU (SELLER) AWARE OF...**
   A. Within the last 3 years, the death of an occupant of the Property upon the Property ..... ☐ Yes ☐ No
   B. An Order from a government health official identifying the Property as being contaminated by methamphetamine. (If yes, attach a copy of the Order.) ..... ☐ Yes ☐ No
   C. The release of an illegal controlled substance on or beneath the Property ..... ☐ Yes ☐ No
   D. Whether the Property is located in or adjacent to an "industrial use" zone ..... ☒ Yes ☐ No
   (In general, a zone or district allowing manufacturing, commercial or airport uses.)
   E. Whether the Property is affected by a nuisance created by an "industrial use" zone ..... ☒ Yes ☐ No
   F. Whether the Property is located within 1 mile of a former federal or state ordnance location (In general, an area once used for military training purposes that may contain potentially explosive munitions.) ..... ☐ Yes ☐ No
   G. Whether the Property is a condominium or located in a planned unit development or other common interest subdivision ..... ☐ Yes ☐ No

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Property Address: _ _ _

Property Address: ___ *y, CA*

12. BOUNDARIES, ACCESS AND PROPERTY USE BY OTHERS: **ARE YOU (SELLER) AWARE OF...**

A. Surveys, easements, encroachments or boundary disputes ☐ Yes ☐ No

B. Use or access to the Property, or any part of it, by anyone other than you, with or without permission, for any purpose, including but not limited to, using or maintaining roads, driveways or other forms of ingress or egress or other travel or drainage ☐ Yes ☐ No

C. Use of any neighboring property by you ☐ Yes ☐ No

Explanation: ___

13. LANDSCAPING, POOL AND SPA: **ARE YOU (SELLER) AWARE OF...**

A. Diseases or infestations affecting trees, plants or vegetation on or near the Property ☐ Yes ☐ No

B. Operational sprinklers on the Property ☐ Yes ☐ No

(a) If yes, are they ☐ automatic or ☐ manually operated.

(b) If yes, are there any areas with trees, plants or vegetation not covered by the sprinkler system ... ☐ Yes ☐ No

C. A pool heater on the Property ☐ Yes ☐ No

If yes, is it operational? .... ☐ Yes ☐ No

D. A spa heater on the Property ☐ Yes ☐ No

If yes, is it operational? .... ☐ Yes ☐ No

E. Past or present defects, leaks, cracks, repairs or other problems with the sprinklers, pool, spa, waterfall, pond, stream, drainage or other water-related decor including any ancillary equipment, including pumps, filters, heaters and cleaning systems, even if repaired ☐ Yes ☐ No

Explanation: ___

14. CONDOMINIUMS, COMMON INTEREST DEVELOPMENTS AND OTHER SUBDIVISIONS: (IF APPLICABLE) **ARE YOU (SELLER) AWARE OF...**

A. Any pending or proposed dues increases, special assessments, rules changes, insurance availability issues, or litigation by or against or fines or violations issued by a Homeowner Association or Architectural Committee affecting the Property ☐ Yes ☐ No

B. Any declaration of restrictions or Architectural Committee that has authority over improvements made on or to the Property ☐ Yes ☐ No

C. Any improvements made on or to the Property without the required approval of an Architectural Committee or inconsistent with any declaration of restrictions or Architectural Committee requirement ☐ Yes ☐ No

Explanation: ___

15. TITLE, OWNERSHIP LIENS, AND LEGAL CLAIMS: **ARE YOU (SELLER) AWARE OF...**

A. Any other person or entity on title other than Seller(s) signing this form ☐ Yes ☐ No

B. Leases, options or claims affecting or relating to title or use of the Property ☐ Yes ☐ No

C. Past, present, pending or threatened lawsuits, settlements, mediations, arbitrations, tax liens, mechanics' liens, notice of default, bankruptcy or other court filings, or government hearings affecting or relating to the Property, Homeowner Association or neighborhood ☐ Yes ☐ No

D. Any private transfer fees, triggered by a sale of the Property, in favor of private parties, charitable organizations, interest based groups or any other person or entity. ☐ Yes ☐ No

E. Any PACE lien (such as HERO or SCEIP) or other lien on your Property securing a loan to pay for an alteration, modification, replacement, improvement, remodel or material repair of the Property ☐ Yes ☐ No

F. The cost of any alteration, modification, replacement, improvement, remodel or material repair of the Property being paid by an assessment on the Property tax bill ☐ Yes ☐ No

Explanation: ___

16. NEIGHBORS/NEIGHBORHOOD: **ARE YOU (SELLER) AWARE OF...**

A. Neighborhood noise, nuisance or other problems from sources such as, but not limited to, the following: Neighbors, traffic, parking congestion, airplanes, trains, light rail, subway, trucks, freeways, buses, schools, parks, refuse storage or landfill processing, agricultural operations, business, odor, recreational facilities, restaurants, entertainment complexes or facilities, parades, sporting events, fairs, neighborhood parties, litter, construction, air conditioning equipment, air compressors, generators, pool equipment or appliances, underground gas pipelines, cell phone towers, high voltage transmission lines, or wildlife ☒ Yes ☐ No

B. Any past or present disputes or issues with a neighbor which could impact the use and enjoyment of the Property ☐ Yes ☐ No

Explanation: proposed mine use will create excessive truck traffic, reduced air quality, ground vibrations, use of explosive materials etc.

Property Address: ___ *nty, CA*

17. GOVERNMENTAL: **ARE YOU (SELLER) AWARE OF...**

A. Ongoing or contemplated eminent domain, condemnation, annexation or change in zoning or general plan that applies to or could affect the Property ☐ Yes ☐ No
B. Existence or pendency of any rent control, occupancy restrictions, improvement restrictions or retrofit requirements that apply to or could affect the Property ☐ Yes ☐ No
C. Existing or contemplated building or use moratoria that apply to or could affect the Property ☐ Yes ☐ No
D. Current or proposed bonds, assessments, or fees that do not appear on the Property tax bill that apply to or could affect the Property ☐ Yes ☐ No
E. Proposed construction, reconfiguration, or closure of nearby Government facilities or amenities such as schools, parks, roadways and traffic signals ☐ Yes ☐ No
F. Existing or proposed Government requirements affecting the Property **(i)** that tall grass, brush or other vegetation be cleared; **(ii)** that restrict tree (or other landscaping) planting, removal or cutting or **(iii)** that flammable materials be removed ☐ Yes ☐ No
G. Any protected habitat for plants, trees, animals or insects that apply to or could affect the Property. ☐ Yes ☐ No
H. Whether the Property is historically designated or falls within an existing or proposed Historic District ☐ Yes ☐ No
I. Any water surcharges or penalties being imposed by a public or private water supplier, agency or utility; or restrictions or prohibitions on wells or other ground water supplies ☐ Yes ☐ No
J. Any differences between the name of the city in the postal/mailing address and the city which has jurisdiction over the property ☐ Yes ☐ No

Explanation: ___

18. OTHER: **ARE YOU (SELLER) AWARE OF...**

A. Any occupant of the Property smoking or vaping any substance on or in the Property, whether past or present ☐ Yes ☐ No
B. Any use of the Property for, or any alterations, modifications, improvements, remodeling or material change to the Property due to, cannabis cultivation or growth ☐ Yes ☐ No
C. Any past or present known material facts or other significant items affecting the value or desirability of the Property not otherwise disclosed to Buyer ☐ Yes ☐ No

Explanation: ___

19. ☐ **(IF CHECKED) ADDITIONAL COMMENTS:** The attached addendum contains an explanation or additional comments in response to specific questions answered "yes" above. Refer to line and question number in explanation.

Seller represents that Seller has provided the answers and, if any, explanations and comments on this form and any attached addenda and that such information is true and correct to the best of Seller's knowledge as of the date signed by Seller. Seller acknowledges (i) Seller's obligation to disclose information requested by this form is independent from any duty of disclosure that a real estate licensee may have in this transaction; and (ii) nothing that any such real estate licensee does or says to Seller relieves Seller from his/her own duty of disclosure.

Seller ___ ***Trustee*** Date ___
Seller ___ ***Trustee*** Date ___

By signing below, Buyer acknowledges that Buyer has read, understands and has received a copy of this Seller Property Questionnaire form.

Buyer ___ Date ___
Buyer ___ Date ___

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CALIFORNIA ASSOCIATION OF REALTORS®

SELLER VACANT LAND QUESTIONNAIRE
(C.A.R. Form VLQ, 11/12)

Seller makes the following disclosures with regard to the real property described as _____
Assessor's Parcel No. _____, situated in _____ ***Nevada*** _____
County of _____, California ("Property").

1. **The following are representations made by the Seller. Unless otherwise specified in writing, Broker and any real estate licensee or other person working with or through Broker have not verified information provided by Seller. A real estate broker is qualified to advise on real estate transactions. If Seller or Buyer desire legal advice, they should consult an attorney.**
2. **Note to Seller:** PURPOSE: To tell the Buyer about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
   - Answer based on actual knowledge and recollection at this time.
   - Something that you do not consider material or significant may be perceived differently by a Buyer.
   - Think about what you would want to know if you were buying the Property today.
   - Read the questions carefully and take your time.
3. **Note to Buyer:** PURPOSE: To give you more information about known material or significant items affecting the value or desirability of the Property and help to eliminate misunderstandings about the condition of the Property.
   - Something that may be material or significant to you, may not be perceived the same way by the Seller.
   - If something is important to you, be sure to put your concerns and questions in writing (C.A.R. Form BMI).
   - Sellers can only disclose what they actually know. Seller may not know about all material or significant items.
   - Seller's disclosures are not a substitute for your own investigations, personal judgments or common sense.
4. **SELLER AWARENESS: For each statement below, answer the question "Are you (Seller) aware of..." by checking either "Yes" or "No." Provide explanations to answers in the space provided or attach additional comments and check paragraph 16.**
5. **BOUNDARIES, ACCESS AND PROPERTY USE BY OTHERS:** **ARE YOU (SELLER) AWARE OF...**
   - **A.** Surveys, markers, stakes, pins or maps showing the location of the Property ..... ☐ Yes ☐ No
   - **B.** Any unrecorded easement, encroachment or other dispute, maintenance or use agreement affecting access to, or the boundaries of, the Property ..... ☐ Yes ☐ No
   - **C.** Use of the Property, or any part of it, by anyone other than you, with or without permission, for any purpose, including but not limited to, using or maintaining roads, driveways or other forms of ingress or egress, or other travel or drainage ..... ☐ Yes ☐ No
   - **D.** Leases, rental agreements, service contracts, licenses, permits or related agreements regarding use of the Property by others ..... ☐ Yes ☐ No
   - **E.** Use of any neighboring property by you ..... ☐ Yes ☐ No
   - **F.** The absence or limitation of legal or physical access to the Property ..... ☐ Yes ☐ No

Explanation: _____

6. **GEOLOGIC CONDITIONS AND ENVIRONMENTAL HAZARDS:** **ARE YOU (SELLER) AWARE OF...**
   - **A.** Fill (compacted or otherwise), soil instability, caves, mines, caverns, or slippage on the Property ..... ☐ Yes ☐ No
   - **B.** Radon, methane or other gases, contaminated soil or water, hazardous waste, or waste disposal sites on the Property ..... ☐ Yes ☐ No
   - **C.** Fuel, oil or chemical storage tanks above or underground ..... ☐ Yes ☐ No
   - **D.** Past or present treatment or eradication of pests or odors ..... ☐ Yes ☐ No

Explanation: _____

Buyer's Initials (_____) (_____) Seller's Initials (_____) (_____)

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VLQ REVISED 11/12 (PAGE 1 OF 4)

SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 1 OF 4)

KETCHAM & ASSOC.,DANIEL R., 11693 Brunswick Pines Road Grass Valley CA 95945 Phone: 5304778056 Fax: 15456 Bilney
Daniel Ketcham Produced with Lone Wolf Transactions (zipForm Edition) 717 N Harwood St, Suite 2200, Dallas, TX 75201 www.lwolf.com

Property Address _____ CA 95945 Date: _____

7. GOVERNMENTAL:	ARE YOU (SELLER) AWARE OF...
A. Agricultural use restrictions pursuant to the Williamson Act or other law	☐ Yes ☐ No
B. Whether the Property is in or adjacent to an area with Right to Farm rights	☐ Yes ☐ No
C. Presence of any endangered, threatened, "candidate" species, wetlands, historic artifacts or human remains on the Property	☐ Yes ☐ No
D. Any protected habitat for plants, trees, animals or insects that apply to or could affect the Property	☐ Yes ☐ No
E. Conditions or laws that may affect the ability to place and/or use a manufactured home on the Property	☐ Yes ☐ No
F. Special taxes pursuant to the Mello - Roos Community Facilities Act, Improvement Bond Act of 1915 or other law	☐ Yes ☐ No
G. Ongoing or contemplated eminent domain, condemnation, annexation or change in zoning or general plan that apply to or could affect the Property	☐ Yes ☐ No
H. Existence or pendency of any rent control, occupancy restrictions or retrofit requirements that apply to or could affect the Property	☐ Yes ☐ No
I. Existing or contemplated building or use moratorium that apply to or could affect the Property	☐ Yes ☐ No
J. Current or proposed bonds, assessments, or fees that do not appear on the Property tax bill that apply to or could affect the Property	☐ Yes ☐ No
K. Proposed construction, reconfiguration, or closure of nearby government facilities or amenities such as schools, parks, roadways and traffic signals	☐ Yes ☐ No
L. Existing or proposed government requirements affecting the Property **(i)** that tall grass, brush or other vegetation be cleared; **(ii)** that restrict tree (or other landscaping) planting, removal or cutting, or **(iii)** that flammable materials be removed	☐ Yes ☐ No

Explanation: _____

8. WATER-RELATED ISSUES:	ARE YOU (SELLER) AWARE OF...
A. Standing water, flooding, pumps, underground water, or water-related soil settling or slippage on or affecting the Property	☐ Yes ☐ No
B. Rivers, streams, flood channels, underground springs, high water table, floods or tides on or affecting the Property	☐ Yes ☐ No

Explanation: _____

9. UTILITIES AND SERVICES:	ARE YOU (SELLER) AWARE OF...
A. Whether any of the following utilities or services are available ON the Property	☐ Yes ☐ No
If yes, check which ones: ☐ wells ☐ sewer ☐ septic ☐ sanitation ☐ leach lines ☐ water ☐ gas ☐ electric ☐ telephone ☐ cable ☐ other _____	
If no, are you aware of the distance such utilities or services are from the Property?	☐ Yes ☐ No

Explanation: _____

10 LANDSCAPING, AGRICULTURE, STRUCTURES OR OTHER IMPROVEMENTS:	ARE YOU (SELLER) AWARE OF...
A. Diseases or infestations affecting trees, plants or vegetation on or near the Property	☐ Yes ☐ No
B. Diseases, infestation or other reason affecting the production of any agricultural trees or crops on the Property	☐ Yes ☐ No
C. Operational sprinklers or irrigation systems on the Property	☐ Yes ☐ No
If yes, are they ☐ automatic or ☐ manually operated.	
D. Any structures or improvements (such as pad, foundations, or shelter)	☐ Yes ☐ No

Explanation: _____

11. NEIGHBORHOOD:	ARE YOU (SELLER) AWARE OF...
A. Neighborhood noise, nuisance or other problems from sources such as, but not limited to, the following: neighbors, livestock, wildlife, insects or pests, traffic, parking congestion, airplanes, trains, light rail, subway, trucks, freeways, buses, schools, parks, refuse storage or landfill processing, agricultural operations, business, odor, recreational facilities, restaurants, entertainment complexes or facilities, parades, sporting events, fairs, neighborhood parties, litter, construction, air conditioning equipment, air compressors, generators, pool equipment or appliances, or wildlife	☒ Yes ☐ No

Explanation: Proposed mining operations that will create traffic noise, Air quality degradation impact surrounding property

Buyer's Initials (_____) (_____) Seller's Initials (_____) (_____)

VLQ REVISED 11/12 (PAGE 2 OF 4)

SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 2 OF 4)

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Property Address: _____ CA 95945 Date: _____

12. COMMON INTEREST CONDOMINIUMS AND DEVELOPMENTS: **ARE YOU (SELLER) AWARE OF...**

A. Any Homeowner or Property Owner Association (OA) governing the Property, or any pending or proposed dues increases, special assessments, rules changes, insurance, availability issues or threatened or pending litigation by or against the OA affecting the Property ..... ☐ Yes ☐ No

Explanation: _____

13. TITLE, OWNERSHIP AND LEGAL CLAIMS: **ARE YOU (SELLER) AWARE OF...**

A. Any other person or entity on title other than Seller(s) signing this form ..... ☐ Yes ☐ No
B. Leases, options or claims affecting or relating to title or use of the Property ..... ☐ Yes ☐ No
C. Any other person or entity other than Seller(s) signing this form with a legal claim to oil, mineral, gas or water rights ..... ☐ Yes ☐ No
D. Past, present, pending or threatened lawsuits, mediations, arbitrations, tax liens, abatement liens, mechanics' liens, notice of default, bankruptcy or other court filings, or government hearings affecting or relating to the Property, OA or neighborhood ..... ☐ Yes ☐ No

Explanation: _____

14. DISASTER RELIEF, INSURANCE OR CIVIL SETTLEMENT: **ARE YOU (SELLER) AWARE OF...**

A. Financial relief or assistance, insurance or settlement, sought or received, from any federal, state, local or private agency, insurer or private party, by past or present owners of the Property, due to any actual or alleged damage to the Property arising from a flood, earthquake, fire, other disaster, or occurrence or defect, whether or not any money received was actually used to correct damage ..... ☐ Yes ☐ No

Explanation: _____

15. OTHER: **ARE YOU (SELLER) AWARE OF...**

A. Reports, inspections, disclosures, warranties, maintenance recommendations, estimates, studies, surveys or other documents, pertaining to the condition of the Property or easements, encroachments, boundary disputes or environmental conditions affecting the Property ..... ☐ Yes ☐ No
(If yes, provide any such documents in your possession to Buyer)
B. Department of Real Estate Public Report, or subdivision map ..... ☐ Yes ☐ No
C. An Order from a government health official identifying the Property as being contaminated by methamphetamine. (If yes, attach a copy of the Order.) ..... ☐ Yes ☐ No
D. The release of an illegal controlled substance on or beneath the Property ..... ☐ Yes ☐ No
E. Whether the Property is located in or adjacent to an "industrial use" zone ..... ☒ Yes ☐ No
(In general, a zone or district allowing manufacturing, commercial or airport uses.)
F. Whether the Property is affected by a nuisance created by an "industrial use" zone ..... ☒ Yes ☐ No
G. Whether the Property is located within 1 mile of a former federal or state ordnance location ..... ☐ Yes ☐ No
(In general, an area once used for military training purposes that may contain potentially explosive munitions.)
H. Whether the Property is a condominium or located in a planned unit development or other common interest subdivision ..... ☐ Yes ☐ No
I. Insurance claims affecting the Property within the past 5 years ..... ☐ Yes ☐ No
J. Matters affecting title of the Property ..... ☐ Yes ☐ No
K. Any past or present known material facts or other significant items affecting the value or desirability of the Property not otherwise disclosed to Buyer ..... ☐ Yes ☐ No

Explanation: proximity to nearby mining operation that creates Noise, truck traffic, poor air quality, ground vibrations etal

16. ☐ **(IF CHECKED) ADDITIONAL COMMENTS:** The attached addendum contains an explanation or additional comments in response to specific questions answered "yes" above. Refer to line and question number in explanation.

Buyer's Initials (_____) (_____) Seller's Initials (_____) (_____)

VLQ REVISED 11/12 (PAGE 3 OF 4)

SELLER VACANT LAND QUESTIONNAIRE (VLQ PAGE 3 OF 4)

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Property Address: _ ***CA 95945*** Date: _____

Seller represents that Seller has provided the answers and, if any, explanations and comments on this Form and any attached addenda and that such information is true and correct to the best of Seller's knowledge as of the date signed by Seller. Seller acknowledges (i) Seller's obligation to disclose information requested by this Form is independent from any duty of disclosure that a real estate licensee may have in this transaction, and (ii) nothing that any such real estate licensee does or says to Seller relieves Seller from his/her own duty of disclosure.

Date ____ __ _____	Date _____ __ _____
SELLER __ ***ainistrator*** _____	SELLER ' ***'ndividual*** _____
By _____	By _____
Print name _____	Print name _____
Title _____	Title _____

By signing below, Buyer acknowledges that Buyer has read, understands and has received a copy of this Seller Vacant Land Questionnaire form.

Date _____	Date _____
BUYER _____	BUYER _____
By _____	By _____
Print name _____	Print name _____
Title _____	Title _____

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INDIVIDUAL LETTER 495: LINDA AND DANIEL KETCHAM

Response to Comment Ind 495-1

The commenter generally identifies a number of impacts identified in the DEIR but does not state how the DEIR is inadequate with regard to the analysis of these impacts. The commenter references traffic impacts, noise from project trucks, degradation of air quality, adverse impacts to private wells, and hazardous waste disposal. Each of these potential impacts were analyzed in the following DEIR Chapters: Chapter 4.12 (Transportation), Chapter 4.10 (Noise and Vibration), Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). Traffic is analyzed in Chapter 4.12 of the DEIR, noise is analyzed in Chapter 4.10 of the DEIR, air quality is analyzed in Chapter 4.3 of the DEIR, impact to wells is analyzed in Chapter 4.8 of the DEIR, and hazards and hazardous waste is analyzed in Chapter 4.7 of the DEIR.

Response to Comment Ind 495-2

The commenter is concerned the project will negatively impact property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 495-3

The commenter requests that the DEIR include an economic impact analysis to quantify potential impacts to property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Individual Letter 496

From: Linda Meyers <lulucoyote@gmail.com>
Sent: Sunday, April 3, 2022 7:49 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 496-1

I'll keep this short and to the point.
Please count my voice in OPPOSITION to reopening the Idaho Maryland mine by Rise Gold.
I am a Nevada City resident and homeowner.

We need to be protecting our environment. This region has been irreparably damaged by extractive mining. No more.
There are many other cleaner industries that can and will enrich our economy.
Rise Gold is a foreign company lacking in competence and integrity. I am not fooled.

No. No No.

Sincerely,
Linda Meyers
Nevada City, CA

1

INDIVIDUAL LETTER 496: LINDA MEYERS

Response to Comment Ind 496-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 497

INSIGHT
LAND PLANNING
908 Taylorville Road, Suite 202
Grass Valley, CA 95949
530-701-7651

April 11, 2022
Via E-mail to: Idaho.MMEIR@co.nevada.ca.us
Matt Kelley – Senior Planner
Nevada County Community Development Agency

Re: **Idaho Maryland Mine**
Response to Draft EIR

Dear Matt,

Thank you for your hard work on the complicated and controversial Idaho Maryland Mine project that is proposed by project applicant Rise Grass Valley. Please see my below comments to the draft Environmental Impact Report.

Ind 497-1

Aesthetics

The draft EIR does not evaluate the aesthetic impact of 24/7 use of heavy equipment at the Centennial Site. Are the hours of operation at the Centennial Site limited or are they authorized to operate 24 hours per day 7 days per week? If so, will there be light impacts at this site from heavy equipment use? The Centennial Site is proposed to be used for 5 years and the appearance of heavy equipment (and their use of lights) is not a temporary construction related impact and should be analyzed as such—a long term impact.

Ind 497-2

Mitigation Measure 4.1-2 is insufficient. Engineered graded fill is permanent and the 50' tall mound of soil will be visible from Highway 49 through Grass Valley forever. A landscaping plan will never sufficiently screen views of the proposed fill site because the land between the highway and the site is private property and will not be included in a landscape plan and therefore this mitigation measure does not improve the view of the site from Highway 49.

Ind 497-3

Hazards and Hazardous Materials

Diesel is not analyzed in the document. Equipment used for the proposed project will require large amounts of diesel to power the machinery. The transportation of large quantities of diesel needs to be evaluated in the document.

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908 Taylorville Road, Suite 202
Grass Valley, CA 95949
530-701-7651

Hydrology and Water Quality

Ind 497-4

Much of the analysis within the referenced hydrologic studies in the EIR assume that the project applicants will utilize existing mine shafts for their mining operations but that is not specified in the project description or otherwise. Overall, exploratory mining and creating new shafts and potentially affecting the water table in unanticipated ways is not addressed in this section. The work that has been done to inform the EIR utilizes historic information and attempts to "map out" the existing conditions of the mine workings and shafts below Grass Valley. Therefore, the analysis is insufficient and analyzes operational effects based on these known shafts. Additional analysis is needed to analyze the drawdown impacts to a much larger area and mitigation measures are necessary to ensure that mining activities do not affect the water table throughout the area of the applicant's mineral rights, not only in the immediate vicinity of the Brunswick site.

Ind 497-5

The Well Mitigation Plan provided as an appendix by Rise Grass Valley underplays the potential for well water draw down within the Grass Valley area and uses language that does not ensure that corrective action will be taken if wells are affected outside of their expected impact area. This document needs to be re-written with pre-defined sampling locations throughout the mineral rights area and explicit corrective actions if wells in the area are affected. The Well Mitigation Plan should include parcels (to be serviced by NID) that are currently undeveloped or vacant.

Ind 497-6

It is not clear within the EIR the amount of water that is able to be treated prior to release into South Fork Wolf Creek. EMKO states that initial de-watering will take over 5 months to extract 385 million gallons of water from the existing shafts and associated groundwater table. Will these 385 million gallons be treated prior to entering Wolf Creek? If not, does the proposed project include sufficient water treatment facilities for this volume of water?

Land Use

Ind 497-7

The EIR utilizes data from 2018 to project housing vacancy rates. This is insufficient and needs further analysis. Vacancy rates are very low in Nevada County especially since the COVID-19 pandemic when many families and professionals migrated out of the city centers and to the foothills. The vacancy rate of 22.5% as stated in the EIR needs to be struck out out and this topic needs to be re-evaluated with the source of information provided in the document. Available housing in both the rental and real estate markets is very low and the potential for over 300 families to our area will have a significant impact which should require mitigation.

INSIGHT
LAND PLANNING
908 Taylorville Road, Suite 202
Grass Valley, CA 95949
530-701-7651

A project of this scale and nature should never be proposed, approved, constructed, or allowed within a town. Especially a beautiful and scenic rural town in Northern California whose residents will see no benefit from the heavy industrial nature of such an intense use of the land.

Sincerely,

Ind 497-8

Lisa McCandless
Land Planner/Owner
Insight Land Planning, LLC

INDIVIDUAL LETTER 497: LISA MCCANDLESS

Response to Comment Ind 497-1

The commenter states that the DEIR fails to discuss the aesthetic impacts from the use of heavy equipment at the Centennial Site and asks whether the heavy equipment would be used 24 hours a day, 7 days a week. The commenter also expresses concern over light impacts at the Centennial Site from the use of heavy equipment. Lastly, the commenter states that the aesthetic impact of heavy equipment use at the Centennial Industrial Site will occur over 5 years and should not be analyzed as a temporary construction impact.

Heavy equipment use at the Centennial Industrial Site will consist of haul trucks and equipment on-site to place, grade, and compact the engineered fill. (DEIR, p. 3-33.) The DEIR anticipates that trucks would transport engineered fill from the Brunswick Industrial Site to the Centennial Industrial Site 16 hours a day, 7 days a week, rather than 24 hours a day, 7 days a week, as incorrectly asserted by the Commenter. (DEIR, p. 3-26.) Hauling and dumping of engineered fill would occur at the Centennial Industrial Site between 6:00AM and 10:00PM, while placement, compaction, and grading of the engineered fill would occur between 7:00AM and 3:30PM. (DEIR, p. 4.1-23.)

Regarding light pollution at the Centennial Industrial Site, the project would not include the installation of any new lighting elements on the Centennial Industrial Site. (DEIR 4.1-23.) Lighting during nighttime hauling and dumping of engineered fill would be limited to haul truck headlights. On-site mobile equipment would not include the addition of substantial reflective surface that would affect the surrounding area. Therefore, the potential for the proposed project to create a new source of substantial light or glare that would adversely affect day or nighttime views in the vicinity of the Centennial Industrial Site would be less than significant. (DEIR, p. 4.1-23.)

Regarding the aesthetic impacts from the use of heavy equipment at the Centennial Industrial Site, the DEIR concludes that the project would substantially degrade the existing visual character or quality of public views and that these impacts are significant and unavoidable. (DEIR, p. 4.1-14–15.) The inclusion of additional analysis of industrial vehicles and mining equipment in the aesthetics analysis would not change the significance finding.

Response to Comment Ind 497-2

The commenter states that Mitigation Measure 4.1-2 is insufficient, specifically with regard to the engineered graded fill piles on the Centennial Site, which the commenter asserts would be visible from Highway 49. The DEIR concurs in that it concludes that visual impacts in this regard would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.1-14–15.)

Response to Comment Ind 497-3

The commenter states that the DEIR fails to discuss the use of diesel fuel, which would be necessary for the project. However, the DEIR does analyze the use and transport of diesel fuel (DEIR, p. 4.7-29–30.) The DEIR states that:

> "various pieces of equipment would be used, requiring the need for diesel fuel. Diesel fuel consumption would vary between 450 to 850 gallons per day, depending on the location where engineered fill is trucked. During normal operations, an average of one 7,500-gallon fuel tanker would travel to/from the sites every nine days, using Brunswick Road to SR 20/49, over the 80-year term of the Use Permit. During any public safety power shutoff events, a maximum of two fuel tankers per day would be required due to additional fuel demands associated with backup generators." (DEIR, p. 4.7-29.)

Because the proposed project would involve the use and storage of a number of hazardous materials, the Project Applicant would be required to obtain a number of permits and approvals from regulatory agencies, as well as comply with all applicable federal, state, and local regulations for the handling, storage, and transportation of hazardous and toxic materials. (DEIR, p. 4.7-30.) Mitigation Measure 4-7-1(d) requires that prior to the transport, storage, or use of hazardous materials at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site, including diesel fuel. (DEIR, p. 4.7-31.)

Response to Comment Ind 497-4

The commenter states that the DEIR's hydrologic studies are inadequate because the analysis assumes that existing mine shafts will be used for mining operations, rather than newly constructed mine shafts. As discussed on pages 3-21 and 3-22 of the DEIR, the existing Brunswick Shaft and a newly constructed Service Shaft would be used in the proposed operation. Other historic shafts would not be used.

The proposed service shaft was included in the groundwater model, and a small cone of depression is clearly shown at the proposed service shaft location on Sheet 12 of DEIR Appendix K.2 (located near the center of the Brunswick Industrial Site). All mine workings, including those within a few hundred feet of the surface, were included in the groundwater model (see Figure 2-3 of Appendix K.3).

The commenter states that the analysis of the DEIR is insufficient because operation effects beyond the historic workings (shafts) has not been conducted and that analysis of the drawdown impacts to a much larger area is necessary to ensure that mining activities do not affect the water table throughout the mineral rights area. However, Chapter 4.8 the DEIR discusses the new mine workings that would be constructed and displays the area of predicted drawdown from the construction of these new workings in Figure 4.8-11 and in Appendices K.2 and K.3 of the DEIR. The simulated drawdown is based on the modelled geology and location of underground mine workings, amongst other factors. Please see Master Response 7 – Location of Future Mining Areas and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As discussed in Master Response 7, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202 included as Appendix A to this Final EIR).

Response to Comment Ind 497-5

The Well Mitigation Plan is not intended to discuss the potential for well water drawdown. Rather, it is intended to provide a plan of actions that would be taken if the groundwater monitoring plan predicted an impact to a domestic water well. The commenter is referred to the Groundwater Monitoring Plan (Appendix K.8 of the DEIR), which discusses pre-defined sampling locations through the mineral rights area. The Well Mitigation Plan has been edited to clarify the performance standards required for Well Mitigation (see Appendix D to this Final EIR). Performance standards are based on actual use of water for similar property types and not the maximum potential of domestic water wells. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Parcels that are currently undeveloped or vacant are not users of groundwater and therefore cannot be impacted by the project. However, one vacant property in the E. Bennett area will be provided NID potable water connection. Property owners of vacant land would not be eligible for reimbursement of NID water charges. The well mitigation plan has been revised to clarify that if the groundwater monitoring plan predicts a potential impact to domestic water wells outside of the E. Bennett Road Area, then nearby properties which do not have well completion records, or a previous negative confirmation, will also be contacted to verify whether there is a well on the property. This would mitigate impacts to properties that are currently vacant but construct a well during the period before a projected impact.

Response to Comment Ind 497-6

As stated on page 4.8-45, the maximum discharge rate permitted would be 2,500 gpm and the treatment plant is designed to be able to treat this maximum capacity (see Appendix K.4). All water discharged would be treated prior to entering South Fork Wolf Creek. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 497-7

The commenter believes that vacancy rates are currently lower due to the COVID-19 pandemic and that the significance conclusion of the DEIR would change and require mitigation. The vacancy rates shown in Table 4.9-5 of the DEIR are broken down by area and 22.5% is the average vacancy rate for Nevada County. Vacancy rates range from 8% in Grass Valley and Nevada City to 51% in Truckee. This data, derived from the 2019 Nevada County Housing Element Update, is from before the COVID-19 pandemic and is the most current information available for use in the analysis of the DEIR. The commenter does not suggest any more current source of data, or show evidence that vacancy rates are so low that the region would not have capacity for any workers moving into the area.

Response to Comment Ind 497-8

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 498

From: Lisa Nowlain
To: Idaho MMEIR
Subject: Re: Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR
Date: Tuesday, January 4, 2022 6:54:09 PM
Attachments: image001.jpg
EIR19-0001 Idaho-Maryland Mine DEIR NOA Final.pdf

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Ind 498-1

Thank you!

Sent from a machine with tiny keys

On Jan 4, 2022, at 7:53 AM, Idaho MMEIR <Idaho.MMEIR@co.nevada.ca.us> wrote:

Good Morning:

Attached please find a copy of the Notice of Availability of a Draft Environmental Impact Report (EIR) and Notice of Public Meeting to Provide Comments on the Idaho-Maryland Mine Draft EIR Project.

The Draft EIR, Notice of Availability and other project materials are now available for public review and download on the Nevada County website at: https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley.

Thank you,

Matt Kelley
Senior Planner

Planning Department
County of Nevada
Community Development Agency

950 Maidu Ave. Suite 170
PO Box 599002
Nevada City, CA 95959-7902

office:530.265-1423
https://www.mynevadacounty.com/512/Planning-Department

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INFORMATION. If you have received it in error, please notify the sender immediately and delete the original. Any other use of this E-mail is prohibited.

I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for walk-ins and for appointments. To schedule an appointment with staff please contact the Planning Department at 530-265-1222 Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

INDIVIDUAL LETTER 498: LISA NOWLAIN

Response to Comment Ind 498-1

The comment does not address the adequacy of the DEIR.

Individual Letter 499

From: L RoweGreenway
To: bdofsupervisors
Subject: Idaho Maryland Mine - citizen comment
Date: Saturday, February 19, 2022 8:59:40 AM

Dist 3

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Ind 499-1

Dear Nevada County Supervisors,

Now is not the time to jeopardize tourism or property values. The traffic and noise impacts, as well as long term risk to our water and air, do not help our businesses, employment or residents. As a long time Nevada County citizen and homeowner in downtown Grass Valley, I appeal to your wisdom and love of our community. Please do not approve the re-opening of the Idaho Maryland Mine.

Lisa Rowe
126 Jan Rd, Grass Valley, CA 95945

INDIVIDUAL LETTER 499: LISA ROWE

Response to Comment Ind 499-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding impacts of the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 500

Dist 3

Ind 500-1

DO NOT !!!
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 500 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials [redacted] the Idaho-Maryland Mine.

DO NOT SUPPORT!!
STOP MINE!

Name(s) LIZARY, JEREMY JONES
Address 15770 Ridge Estates Rd ZIP 95959
Phone 530.263.3860
Email Address lizaryj@gmail.com

INDIVIDUAL LETTER 500: LIZARY AND JEREMY JONES

Response to Comment Ind 500-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 501

From: Lorraine Hendriksen
To: Matt Kelley
Subject: Re: Idaho Maryland Mine public comment
Date: Thursday, February 17, 2022 7:47:45 PM
Attachments: image001.jpg

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Ind 501-1

Dear Mr. Kelley,
My opinion stands. Please do not let the Mine open. It will destroy our community. I will surely leave the county, as will many of my friends. Our property values will plummet. Please do not let this happen to our wonderful home.
Thank you for your time,
Lorraine Hendriksen

Sent from my iPhone

On Aug 24, 2020, at 6:16 AM, Matt Kelley <Matt.Kelley@co.nevada.ca.us> wrote:

Good Morning Ms. Hendriksen:

Thank you, we have received your comments on the Notice of Preparation of an Environmental Impact Report (EIR) for the Idaho-Maryland Mine – Rise Grass Valley Project and the scope of the EIR analysis and they will be forwarded to the EIR consultant and the project applicant for review and consideration into the scope of the EIR.

Below is a link to the project application materials which can provide you with additional details and supporting documents related to the proposed project:
https://www.mynevadacounty.com/2881/Idaho-Maryland-Mine---Rise-Grass-Valley

We are early in the process of reviewing and evaluating the proposed project and are just initiating the preparation of the Environmental Impact Report. As required by the California Environmental Quality Guidelines (CEQA), there are requirements which are governed by California State Law that require the EIR analyze and evaluate certain issue areas including but not limited to: Hydrology and Water Quality, Traffic and Transportation, Noise, Biological Resources, Air Quality Impacts, Greenhouse Gas Emissions, Geology/Soils, Hazards / Hazardous Materials, Cultural Resources, Wildfire, and Mineral Resources. These issue areas will be analyzed in the EIR based on technical

studies that were submitted by the applicant and that were prepared by professionals in their respective fields. These technical studies will also be peer reviewed by the outside consulting firm that the County has contracted with to prepare the EIR. Drafting of the EIR will take many months to complete and is currently anticipated to be completed in late Fall, 2020.

Once the Draft EIR is completed, a Notice of Availability (NOA) will be released which will begin a minimum of a 45-day review and comment period to provide interested individuals an opportunity to review and respond to the adequacy of the draft EIR prepared for the proposed project. During the 45 days, a public meeting will occur to accept comments on the EIR in addition to any emails or written comments that are submitted during the public review period. The public meeting will be noticed as part of the release of the NOA for the draft EIR. The EIR consulting firm will take all of the comments received and will respond to all comments in writing as part of the Final EIR. As part of the Final EIR, it will contain any additions or revisions to the Draft EIR based on the public and agency comments received as well as all of the written responses to all of the comments received during draft EIR comment period. The Final EIR will be released for a public comment period of not less than 10 days as required by California State Law and before any public hearings are held to consider the proposed project. A noticed Planning Commission hearing will be held to consider the project and the EIR and there is the potential for there to be multiple hearings before the Planning Commission. All comments received during the entire process will be part of the record for consideration by the Planning Commission. The Planning Commission will make a recommendation to the Board of Supervisors on the proposed project. After a recommendation is made on the project by the Planning Commission, a public hearing will then be scheduled before the Board of Supervisors to consider the proposed project, the Environmental Impact Report and the Planning Commission's recommendations along with all public comments received throughout the process. As required, and similar to the Planning Commission public hearing(s) the Board of Supervisor public hearing(s) will be properly noticed and will provide an additional opportunity for the public and agencies to provide comments on the proposed project. The Board of Supervisors will take action on the proposed project during their noticed public hearing.

Available application materials and supporting documents related to the proposed project including the Notice of Preparation, Project Description, and project application materials are available for public review at the Planning Department office at 950 Maidu Avenue, Suite 170, Nevada City, CA 95959 or they may be viewed at https://www.mynevadacounty.com/2881/Idaho-Maryland-Mine---Rise-Grass-Valley.

Thank you again for your comments on the Notice of Preparation of the EIR. There will be additional opportunities to comment on the proposed project throughout the EIR and public hearing processes.

If you have any additional questions, please let me know at your convenience.

Sincerely,

Matt Kelley
Senior Planner

Planning Department
County of Nevada
Community Development Agency

950 Maidu Ave. Suite 170
Nevada City, CA 95959
office 530.265-1423
https://www.mynevadacounty.com/512/Planning-Department

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The Nevada County Community Development Agency customer service counter is now open by appointment only. Appointments are available Monday through Thursday, 9 am - 11am, and 1 pm - 3 pm daily. To schedule an appointment please contact the Planning Department at 530-265-1222 option 2 at least one day in advance. The Planning Department will be continuing to provide services through email, phone, and online services. Applications for permits are available through our website at https://www.mynevadacounty.com/512/Planning-Department. Before submitting an application, please contact the Planning Department and speak with a Planner. If you have any questions and/or concerns please don't hesitate to contact us directly at planning@co.nevada.ca.us or 530-265-1222 Option 2.

-----Original Message-----
From: Lorraine Hendriksen <lorraine.hendriksen@gmail.com>
Sent: Monday, August 17, 2020 2:59 PM
To: Matt Kelley <Matt.Kelley@co.nevada.ca.us>
Subject: Idaho Maryland Mine public comment

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 501-2

Dear Mr. Kelley,
Thank you for reading this public comment regarding the possible reopening of the old mine near Brunswick road. While it's unlikely I'll say anything you haven't already heard, I felt it important to write. I felt especially compelled, given the lack of communication and information regarding this project. It seems that even this public comment time was not made especially public, a lot of us caught by surprise of news of the project, including the immediate deadline for these submissions.

I have lived in the county for nearly 40 years. I have owned or been a part of many

businesses and facets of the county. In that time I have seen several companies attempt this project. There are simply too many concerns that cannot be addressed and guaranteed. Water (currently more valuable than gold), pollution of every kind, traffic, destruction of ecosystems, underfunded companies not being able to fulfill obligations. It all spells danger for our community.

While I have your attention, who do I speak with about the 174 project? It's great Cal trans is trying to make things safer. We have all heard rumors though of an increased speed limit. Making the road straighter and raising the speed limit is not the right idea. We don't want and can't turn into another 49. Please don't raise the speed limit. How about a signal at You Bet Road? How about law enforcement out there once in a while to remind people to slow down? Please help. There are too many things that are trying to be pushed through while we are all dealing with our world crisis. It will not end well if big mistakes are made. We all want to protect this beautiful place we call home.

Thank you for your time. Im sorry this got as long as it did. It's important though that we stay involved with our community, and help move forward with integrity and care. To that end, thank you for your help.
Sincerely,
Lorraine Hendriksen

INDIVIDUAL LETTER 501: LORRAINE HENDRIKSEN

Response to Comment Ind 501-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 501-2

Please see Master Response 1. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 502

From: Lorraine Hendriksen
To: Idaho MMEIR
Subject: PLEASE DON'T ALLOW MINE
Date: Tuesday, March 15, 2022 10:07:02 AM

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Dear Committee,

Ind 502-1 I am writing with regards to the proposed Idaho Maryland Mine. Do we need any more to worry about or guard against, no. Please do not allow this charade to go on any further, it is a waste of time, money and energy, all already stressed and unable to manage what we have. The work the mine will require will RUIN our county. It is appalling to me, after so many past attempts, that this is even considered. Please beware of greed.

Ind 502-2 Water, noise, traffic, property value decrease, overall long and short term disruption and degradation of the environment, pollution, stress, anger, frustration. The overall cost of monitoring their operations, making sure they do the right thing, which they don't have a history of, is another added stress on every level.

Ind 502-3 I have lived in this beautiful place for more than 40 years. I've seen a lot of change in that time, some welcomed, some not so much. Opening the Mine would change everything. Most of my friends and I would leave. Please, you cannot approve this. Stop this crazy stressful time consuming destructive project now. Our county population is overwhelmingly against it. Please start listening to us instead of your bank accounts and political aspirations. I am writing because I care about our county, our homes. We cannot afford to do this, on any level in any way. It is all too precious.

Thank you for your time,
Lorraine Hendriksen

Sent from my iPhone

INDIVIDUAL LETTER 502: LORRAINE HENDRIKSEN

Response to Comment Ind 502-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 502-2

Please see Master Responses 1 through 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 502-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 503

From: Lorraine Reich <reichlawoffice@gmail.com>
Sent: Wednesday, March 23, 2022 1:38 PM
To: Idaho MMEIR
Subject: Re-Opening of the Idaho Maryland Mine

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Dear Planning Commission and Board of Supervisors:

Ind 503-1 I am a 30+ year resident of Nevada City where I own my residential property. I also own property where I have my business located at 254 Colfax Avenue in Grass Valley. It is my business property that will be heavily impacted by the reopening of this mine.

Here are my concerns:

Ind 503-2 There are100 miles of tunnels running beneath the boundaries of Grass Valley City that are already full of toxic water from the 1800's mining operations. Any new mining operation will necessarily be required to use millions of gallons of water with much of that water flowing back into these toxic tunnels, and back into our water sources and watershed. The use of this amount of water required for mining operations is unsustainable and arguably unethical in these times of drought and climate change. It will be getting hotter, and Nevada County residents will be using more water for their daily needs. They should not have to compete with a for-profit Canadian mining corporation which has no moral compulsion to minimize its use of our precious water.

Ind 503-3 As a business owner in Grass Valley, I remain concerned over the level of noise, air pollution, and machinery/trucks rolling through our streets that will be caused by the mining operation. There are no mitigation devices I can imagine that would offset the negative impact these concerns will have on the quality of our lives or our population.

I am against the Rise gold Mining Operation because it has no foreseeable benefits to the local Nevada County residents.

Lorraine Reich
(530) 274-1077

INDIVIDUAL LETTER 503: LORRAINE REICH

Response to Comment Ind 503-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 503-2

Please see Master Responses 8 through 10 and 13 through 16. In addition, please see Master Response 3. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 503-3

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 504

Lorraine Walter & Terry Sullivan
10970 Gold Hill Drive
Grass Valley, CA 95945

April 4, 2022

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff

Attn: Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959
Ph: 530 265-1423
Email: matt.kelley@co.nevada.ca.us
DEIR Comment Email: idaho.mmeir@co.nevada.ca.us

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

To All Concerned:

This is to express my grave concerns about the proposal to re-open the Idaho-Maryland Mine and the clear inadequacy of the applicant's draft environmental impact report (DEIR).

Ind 504-1

I (Lorraine) am a seasoned environmental professional, having worked as a land use planner for local government for many years and as a watershed planner/coordinator. I am well acquainted with CEQA and the analysis of potential environmental impacts. My husband (Terry) owns several commercial properties in Grass Valley.

As was well summarized by the many expert testimonials at the recent Planning Commission hearing, the data and analyses in the DEIR fail to meet the standards of adequacy on many fronts. While I have concerns about many of the impacts the mine would certainly bring, I have chosen to focus this letter on the topic of water, because of the life-critical nature of this resource, especially at this very unstable time we are in.

Our community is in a position with regard to water resources that many across the state and nation would envy, that is we have a decent supply and quality of this precious resource. We cannot take this for granted and we should not hand this priceless asset over to a corporation with short-term interests.

I concur with the analyses that have been done of the DEIR by the Nevada Irrigation District (NID), the Wells Coalition, the Community Environmental Advocates, and other experts related to the project's potential impacts to local water supplies and water quality. Specifically:

Ind 504-2

The groundwater impact assessment is flawed and inadequate.

- The data inputs used in the analysis contradict the data of more reliable sources.
- The analysis provides no water balance assessment to justify inflow/outflow estimates.
- Seasonal variations in water levels are based on only a few years of data.

- The model omits the effect of the project's planned new access shaft, as well as other existing features that would affect groundwater levels.
- The impact of existing faults in the area was not factored in.

The plan for groundwater monitoring is flawed and inadequate.

Ind 504-3

- The DEIR tries to defer collection of needed additional groundwater data to future monitoring. Since the project's impacts to groundwater are likely to directly affect hundreds of residents living near the project who rely on groundwater, the assessment of these potential impacts cannot be deferred to the future, nor is this allowed per CEQA.
- The DEIR proposes an inadequate number of monitor wells (i.e., 15) given the large area of potential impacts and the complex, fractured bedrock nature of the hydrology.

The proposed mitigation for groundwater impacts is woefully inadequate.

Ind 504-4

- According to the Wells Coalition, there are 525 private wells within a half mile of the mineral rights boundary, yet the DEIR proposes to mitigate for only 30 potentially impacted wells. The area of potential impact has not been adequately defined, especially given the complex nature of fractured rock hydrology and the high level of uncertainty in hydrologic models. NID's request for an additional water line to be installed in the Whispering Pines area to mitigate for potentially impacted wells validates this concern.
- The Well Mitigation Plan offers no plan to track well history so that impacts to surrounding wells can be verified, leaving residents on their own to claim damages.
- As pointed out by NID, the proposed water supply mitigation measure underestimates the water supply demand of impacted properties.
- The mitigation measure to compensate impacted well owners is written to expire at the sale of the property, whereas true compensation of impacts would have the mitigation obligation attached to deed itself.
- The costs to restore water service and supply interim water to impacted well owners is not adequately addressed, nor is the loss in property values that the lack of water supply would create for residents until water service with NID could be established.
- The mitigation does not provide adequate financial assurance, such as a bond, to cover the potential water related impacts to landowners in the vicinity of the project.

The water quality impacts to the South Fork Wolf Creek—including increases in water temperature, water volume, and toxic heavy metals—were not adequately assessed.

Ind 504-5

- The number of water quality samples used for the analysis was insufficient and the location of the sampling is in question.
- Water quality sampling of the South Fork Wolf Creek by the community for over 15 years has provided fine-scale data on historic water temperature by season. These data contradict water temperature data presented by the applicant.
- The assessment of the potential for the mine's waste rock to produce poor quality water discharge over the long term was not performed pursuant to Water Board standards.

2 of 3

Ind 504-6

It is unfortunate that at a time of growing uncertainty on so many fronts—including the consequences of extended droughts and extreme weather events—our community members must divert their attention and resources to the topic of defeating a commercial venture that could have devasting long-term impacts.

Now is the time to be putting everything we have into becoming more locally self-reliant and resilient. And to do this well requires the most prudent use of our limited water resources.

I hope you will do all that you can to ensure this poorly designed and inadequately assessed project does not move forward and further strain the resources of our community.

Thank you for your consideration and for your service.

Sincerely,

Lorraine Walter and Terry Sullivan
Nevada County residents and local business owners

3 of 3

INDIVIDUAL LETTER 504: LORRAINE WLATER AND TERRY SULLIVAN

Response to Comment Ind 504-1
The commenter states that the DEIR is inadequate but does not provide additional information. Responses to specific comments are provided below. The commenter's opposition to the project is noted for the decisionmakers. The commenter may also refer to responses to Agency Letter 10 (NID), Group Letter 28 (Wells Coalition), and Group Letters 7 and 8 (CEA).

Response to Comment Ind 504-2
The commenter provides a summary of various comments submitted by Community Environmental Advocates (CEA). The commenter is referred to Response to Comments Grp 7-68, 7-64, 7-65, 7-25, and 7-91.

Response to Comment Ind 504-3
The commenter states that DEIR's groundwater monitoring is inadequate. The commenter also states that the DEIR attempts to defer an assessment of impacts to groundwater but does not state how the DEIR defers mitigation in this regard. The commenter also states the DEIR proposes an inadequate number of monitoring wells. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 504-4
The commenter states that the DEIR understates the number of groundwater wells potentially impacted by the project because of the extent of the mineral rights boundary. The commenter states that the DEIR's groundwater mitigation measures are inadequate for a number of reasons. Regarding the area covered by the mineral rights boundaries, the commenter is referred to Master Response 7 - Location of Future Mining Areas. Regarding the adequacy of the groundwater mitigation measures, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The commenter also states that the impacts to groundwater wells will reduce property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter is also referred to responses to Nevada Irrigation District Letter 10 of the Final EIR.

Response to Comment Ind 504-5
The commenter states that the proposed discharge to South Fork Wolf Creek would result in increased water temperature, increased water volume and toxic heavy metals and states the DEIR did not adequately analyze these impacts. Specifically, the commenter states that community water sampling data contradicts the data in the DEIR but provides no evidence of this claim. The commenter is also referred to Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 504-6
The commenter states that the County should not consider approving this project in light of the drought and climate change more broadly. The commenter is referred to Master Response 16 -

Drought and Climate Change. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 505

Dist 3

RECEIVED
MAR 03 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Please fill out and send back to us your support for the Idaho-Maryland Mine

DO NOT IN

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Lou V. Johnson

Address 101 W. McKnight Way ZIP

Phone Suite B 292

Email Address Grass Valley CA 95949

Ind 505-1

2-26-22

Lou V. Johnson

I oppose this mine project. Please vote against it!!

INDIVIDUAL LETTER 505: LOU JOHNSON

Response to Comment Ind 505-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 506

Odin

January 29, 2021

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 94959-8617

Dear Mr. Kelley:

Ind 506-1 I am writing in support of the proposal by Rise Grass Valley to re-open the Idaho-Maryland Mine in Grass Valley and to rehabilitate the Centennial area site for future use.

This project will yield numerous economic benefits for the local community such as new jobs and contract opportunities for small businesses. The region is in desperate need for new jobs, and the $38 million in annual new payroll is a major boost for the region.

Ind 506-2 However, one of the lesser discussed aspects of the project that will prove to be a major community asset is the rehabilitation of the Centennial site for use of future businesses. The Rise plan to clean up the site is an enormous community benefit to Grass Valley and Nevada County, and they should be praised for their efforts to turn this site into a safe, usable area. When rehabilitated, the site will be transformed into a vital new area for industrial growth. Nevada County has a serious shortage of industrial space at present, and that makes it more difficult for local businesses to operate locally. Adding 31 acres of new industrial land potentially eliminates that problem and opens up new possibilities for the county.

Ind 506-3 As a construction business owner that operates in Nevada County, I can tell you that it is incredibly important to address the issue of opening up areas for potential new growth, otherwise critical opportunities to protect local jobs will be lost. I urge you to support Rise Grass Valley and move Nevada County in the direction of strong economic growth.

Yours Truly,
Odin Construction Solutions, Inc.

Louay M. Owaidat, President and CEO

4740 Rocklin Road, Rocklin, CA 95677 | 916.251.5500 | odinconstruction.com

INDIVIDUAL LETTER 506: LOUAY OWAIDAT

Response to Comment Ind 506-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 506-2

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 506-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 507

From: Louis Jones <louisbjones@sbcglobal.net>
Sent: Monday, April 4, 2022 5:02 PM
To: Idaho MMEIR
Subject: Please count me as a "No."

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To Whom It May Concern:

Ind 507-1 With regard to the Idaho-Maryland mine project, I worry about the unforeseeable consequences of de-watering. The West is a more fragile ecosystem than most realize, and especially as the century to come looks like it will be harder on the water table, I worry about hydrological issues.

Ind 507-2 However, the more important misgiving about the mine is its financial structure and its business flim-flam. RiseGold isn't well capitalized, and in the end it offers nothing to this community. The better-paid jobs will go to specialists, probably brought in from elsewhere, and maybe for a year our local folks will get employment — but on the whole, it seems like little more than a source of noise and dust.

Thank you — Louis Jones

INDIVIDUAL LETTER 507: LOUIS JONES

Response to Comment Ind 507-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please see the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 507-2

Please see Master Responses 1 through 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 508

From: Louis T. Quaintance <bodyart@lmi.net>
Sent: Monday, April 4, 2022 10:04 AM
To: Idaho MMEIR
Subject: DEIR comments

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To Nevada County Planning Commission
Attn: Matt Kelley, Senior Planner
950 Maidu Avenue
Nevada City, CA 95959

Planning Commissioners and Staff

Ind 508-1 I am a resident of Nevada County, living uncomfortably close to the mineral rights boundary of the proposed Idaho-Maryland Mine Project. After attending the Planning Commission meeting on March 24, 2022, I am convinced that the Draft EIR of this project does not describe, or present adequate mitigations for, the mine's impacts on the quality of life here in Western Nevada County.

Ind 508-2 As a bicyclist and visual artist, the conditions along East Bennett, Greenhorn, Brunswick, Whispering Pines and Idaho-Maryland roads will become unbearable due to:
Construction of the pipeline along East Bennett Road
Heavy truck traffic with noxious exhaust fumes and potentially toxic dust
Unsightly development of mine structures and of fill piles up to 7 stories high which will destroy the "aesthetics" of the area.
Significant impacts on the South Fork of Wolf Creek and its associated watershed, and on Empire Mine State Historic Park.

Ind 508-3 Air quality will be significantly affected by additional heavy traffic along local roads, and by mine construction and operations at the Centennial and Brunswick sites.

Ind 508-4 Additional noise will severely impact the areas surrounding the mine:
New truck traffic of 100 round trips a day, 16 hours a day, 7 days a week.
Constant construction for the first year or more.
Grading, rock crushing/compacting, and excavating operations.
Underground blasting and drilling.

Ind 508-5 Property values in my neighborhood will plummet due to the mine's significant impacts on quality of life here: traffic, noise, poor air quality, toxic hazardous waste and dust, the unsightly processing plant and fill piles.

Ind 508-6 In addition to comments of speakers at the meeting, CEA Community Environmental Advocates, has written an extensive list of comments on behalf of many concerned Nevada County community groups.
I urge that all these comments be answered, and corrections made to the DEIR.

1

Ind 508-7

Rezoning is required in order to get the mining operation approved. raising the allowable limits on a variety of measures, including noise and traffic. Do not allow rezoning. Keep allowable limits to acceptable levels.

In conclusion, the presence of the proposed Idaho-Maryland Mine will make life here literally unlivable, and will consequently destroy our way of life.

Sincerely,
Louis Quaintance
10777 Banner Mine Way
Nevada City, CA 95959
email: bodyart@lmi.net

2

INDIVIDUAL LETTER 508: LOUIS QUAINTANCE

Response to Comment Ind 508-1
Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 508-2
Traffic, including traffic during construction of the pipeline in East Bennett Road, is addressed in Chapter 4.12, Transportation, of the DEIR. Air quality, including from truck traffic, is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Please see Master Response 12 – Chemical Dust Stabilizers. Aesthetics is addressed in Chapter 4.1, Aesthetics, of the DEIR. Please see Master Response 35 – Discharge to South Fork Wolf Creek. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 508-3
Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 508-4
Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 508-5
The comment does not address the adequacy of the DEIR. Please see Master Response 2.

Response to Comment Ind 508-6
The comment refers to comments made by CEA. Please see responses to Group Letter 6, 7, and 8.

Response to Comment Ind 508-7
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 509

From: Louisa Suta
To: bdofsupervisors
Subject: Please say NO to Rise Gold
Date: Sunday, February 20, 2022 8:37:40 PM

Dist 1

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Ind 509-1

Hello,
Please take care of our community and not allow Rise Gold to open. Rise Gold has left a trail of grotesque negligence in Canada. Why would we open another mine before the damage from the last mine is cleaned up?

Ind 509-2

Also Rise Gold sent out brochures with postcards to send back in support and I sent that postcard back to them contesting their inaccurate science. It was just brought to my attention that they will count all returned postcards as a sign of support so please know many people also did this so their returned postcards do not reflect this community's opinion.

Thank you for not allowing a dangerous mine into our lives.

Louisa Suta
10406 N Bloomfield Rd, Nevada City, CA 95959

INDIVIDUAL LETTER 509: LOUISA SUTA

Response to Comment Ind 509-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 509-2

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 510

From:
Louise Jackson
603 W. Broad St.
Nevada City, CA 95959

March 31, 2022

To:
Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959
Idaho.MMEIR@co.nevada.ca.us

Re: Draft Environmental Impact Report (DEIR) on the Idaho-Maryland Mine Project

Dear Mr. Kelley,
Thank you for the opportunity to comment on the DEIR for the Idaho-Maryland Mine Project.

Ind 510-1 I have major concerns about the DEIR's inadequate analysis of toxic elements, and its lack of a detailed scientific approach for sampling and testing rock, soils, and sediments for toxics such as asbestos and arsenic. My comments are relevant to the categories of Air Quality, Hazards and Hazardous Materials, and Geology, Soils, Mineral Resources.

Asbestos in rock and tailings:

Ind 510-2 Airborne asbestos particles may represent a significant cancer risk to mine workers and the population of Grass Valley. Yet sampling and analysis of asbestos was conducted in a meager and cursory way in the DEIR. A very small number of rock samples was tested as shown in the Asbestos Sampling Memo[1] and the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan[2]. Moreover, the sampling strategy did not use a systematic approach, and did not follow a scientific design scheme. There was no sampling grid, nor was there a spatially explicit sampling design that could designate areas of critical concern for exposure and public health.

Ind 510-3 Only 40 rock core samples were analyzed for asbestos in the entire mining area[3]. These cores were apparently chosen from a set of exploratory cores for mining purposes, not for the intentional purpose of systematically sampling the distribution and concentration of asbestos for analyzing risks of exposure.

Ind 510-4 Asbestos was present in more than one-third of the cores, based on analysis using Transmission Electron Microscopy (TEM). Asbestos was discovered in all of the rock types, in varying concentrations. This is quite a high frequency from the point of view of human health, since it means that precautions for exposure must be taken very seriously, both in underground mining and in the rock for engineered fill.

[1] Richard Lippoth, Idaho-Maryland Mine Project Asbestos Sampling Memo. June 16, 2020. Vergence Geo Services Inc. Reno, NV. (https://www.mynevadacounty.com/DocumentCenter/View/34999/Asbestos-Sampling-Memo---ADDED-6262020).
[2] Idaho-Maryland Mine Project Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan Rise Grass Valley Inc. November 2021. (https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan)
[3] APPENDIX C IDAHO-MARYLAND EXPLORATION ASBESTOS SAMPLING of the ASUR Plan (https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan).

From the entire Centennial Industrial Site, only two samples were taken from the historic tailings. Asbestos was detected in one these samples, reinforcing the need for a more complete survey of the potential asbestos contamination in this 56-acre area.

Ind 510-5

It should be noted that the data on asbestos in the DEIR are not up-to-date with the results of the ASUR Plan in Appendix E.2. For example, this statement is from page 4.3-80 of the DEIR: "*naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Indutrial Site or Centennial Industrial Site.*" Yet asbestos does occur based on the results described in the paragraph above. This is another indication of the need for a complete and robust documentation for the asbestos risks in the project.

Ind 510-6

While an Asbestos Mitigation Plan will be prepared by Rise Gold, actual implementation would require extremely careful attention at all times during the 80 years of mining. Such an example is that "*All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device*" (page 2-17 of the DEIR). If such safety procedures were overlooked, even temporarily, partially, or inadvertently, exposure would increase, especially given the apparently high frequency of asbestos in rock.

Ind 510-7

In the ASUR plan mentioned above, asbestos analysis of air samples will be reported as transmission electron microscopy (TEM) asbestos structures per cubic centimeter (s/cc). It is difficult to imagine how this will be performed across the mining and fill sites in a valid manner, given the current inability to even produce a sampling plan that adequately portrays the distribution of asbestos hazards in rock.

Ind 510-8

Over 80 years, a huge volume of rock will be processed by Rise Gold (1000 tons per day). There are many sources of asbestos emissions as rock gets blasted, crushed, and transported around the mining area. Since aerial transport and runoff can carry asbestos off site as well, more attention must be placed on asbestos risk analysis including the larger area surrounding the mine. The plan in Appendix E.2[4] has inadequate detail on mitigation measures and sampling, and it is especially weak on spatially explicit recommendations.

Ind 510-9

The public deserves a robust study and analysis of the risks of asbestos exposure and its health concerns for future generations. Please require that the asbestos sampling approach and protocols of the DEIR be updated to reflect the entire mining area and the huge amount of rock that will be removed during the 80-year duration of the project; re-analyze the impacts of asbestos exposure for the project and recirculate the DEIR.

Ind 510-10

<u>Arsenic at the mine site and in Wolf Creek drainage basin:</u>
Arsenic is a naturally occurring element that can cause serious effects on neurologic, respiratory, and gastrointestinal systems. It is also a carcinogen. My comments will focus on the inadequacy of the DEIR's analysis of the movement of arsenic in the Wolf Creek Basin, and thus on the potential exposure for people and wildlife in the area.

The DEIR recognizes arsenic as a serious pollutant and concludes that elevated arsenic in the southeastern paved area of the mine creates a significant hazard to the public and the environment

[4] Idaho-Maryland Mine Project Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan Rise Grass Valley Inc. November 2021. (https://www.mynevadacounty.com/DocumentCenter/View/41621/Appendix-E2_ASUR-Plan)

(Chapter 4.7 – Hazards and Hazardous Materials Page 4.7-35). Arsenic occurs above its maximum contaminant level (MCL) in New Brunswick drain samples (Chapter 4.8 – Hydrology and Water Quality Page 4.8-21).

To dewater the mine, Rise Gold will pump millions of gallons every day for 6 months, and dewatering will continue for 80 years. This water will inundate stream corridors, and the scouring of creek banks will move sediment downstream toward Grass Valley. The DEIR does not adequately discuss the already existing arsenic contamination in the Wolf Creek area that results from past acid-mine drainage and mining contamination[5]. I have found no mention of a 2009 study of soil samples by Wolf Creek Community Alliance showing high concentrations of arsenic in some places. These data indicate the need for a robust study on existing arsenic contamination along the waterways affected by dewatering. If dewatering mobilizes existing arsenic into waterways, it can be transported downstream toward Grass Valley where people risk exposure from water and sediment near their homes and recreational areas.

Ind 510-11

While the DEIR acknowledges the potential for acid mine drainage impacts on waterways, it also must address the impact of its dewatering on exposure to arsenic from movement of sediment off-site. A robust hydrologic study is needed to understand how dewatering the mine may increase the risk of exposure to arsenic as well as other toxic minerals such as chromium and lead that also are in existing sediments. This will require sampling of soils and sediments along the stream courses in a systematic approach that considers topography and mining history, along with hydrologic modeling to examine the fate of these toxics in the urban landscape and beyond. Another big concern is movement of arsenic-containing sediment when dewatering occurs during large winter storm events. These 'atmospheric rivers' are expected to become more frequent due to climate change[6].

Ind 510-12

The people and wildlife in the Grass Valley area should not be subjected to an increase in arsenic due to the Rise Gold mine, and they deserve thorough analysis of the effects of mining on its toxicity. Please require that a watershed sampling approach for arsenic and hydrologic modeling be included in an updated version for the DEIR; re-analyze how the project will directly or indirectly increase exposure to arsenic causing potentially significant impacts on the environment and public health.

Thank you for your consideration,



Louise Jackson
Emerita Professor and Cooperative Extension Specialist
Department of Land, Air and Water Resources
University of California Davis

Attachment: BJ Schmitt, Wolf Creek Community Alliance 2009 Soil Sampling Report. January 26, 2010. (https://www.wolfcreekalliance.org/documents/WCCA_SoilToxinResults2009.pdf)

[5] BJ Schmitt, Wolf Creek Community Alliance 2009 Soil Sampling Report. January 26, 2010. (https://www.wolfcreekalliance.org/documents/WCCA_SoilToxinResults2009.pdf)

[6] D.L. Swain, B. Langenbrunner, J.D. Neelin and A. Hall. 2018. Increasing precipitation volatility in twenty-first-century California. Nature Climate Change 8:427-433.(https://doi.org/10.1038/s41558-018-0140-y)

Wolf Creek Community Alliance
2009 Soil Sampling Report
By BJ Schmitt
January 26, 2010

Introduction:
Wolf Creek watershed is located in one of the most heavily gold-mined areas of California. Historical mining has left a toxic legacy in the soils and water of Nevada County. Wolf Creek Community Alliance received a grant from the Rose Foundation in June 2008 to start a preliminary mining-toxin survey in our watershed.

Soil Samples:
WCCA collected soil samples in April 2009 from targeted locations where there are visual or other indicators (e.g. yellow-boy) of possible acid-mine drainage and potential mining contamination. Figures 1 through 4 show some of the sites we tested. Figure 5 is a map that locates the sampling sites in the Wolf Creek watershed. A team collected soil samples from 21 sites in the watershed, mostly in or near Grass Valley. We sent the screened soil samples to ALS-Chemex labs in Reno, Nevada, where they were tested for levels of 33 elements in their ME-ICP 61 panel, as well as for Mercury (Hg) in their Hg-CV41 test.

Ind 510-13

Toxicity Thresholds:
Human health and environmental thresholds were researched, and both EPA and State of California values are included in this report.

- The "Friends of Deer Creek" (FoDC) thresholds are primarily taken from the California Human Health Screening Levels (CHHSL), with the exception of cobalt and arsenic.
- The cobalt decision rule is from EPA's Preliminary Remediation Goal (PRG) for Residential Soil.
- Arsenic toxicity is related to bioavailability, similar to mercury. California's Department of Toxic Substances Control (DTSC) is due to publish a report on the bioavailability of arsenic in various foothill soils. It will be more appropriate to determine thresholds for arsenic after the publication of the DTSC report. According to FoDC, background levels in our area are 20 to 30 ppm, higher than the screening levels, and the human health threshold for this study is 22 ppm.
- Thresholds listed in this report under "EPA review" include thresholds for health of plants, soil invertebrates, birds (avian herbivores, insectivores and carnivores) and mammalian herbivores, insectivores and carnivores. These values are taken from the federal EPA Ecological Soil Screening Levels (SSL) website (www.epa.gov/exotox/ecossl). This site summarizes values from volumes of research project results.

1

- A few screening levels are also reported from Lubomir Simeonov's "Soil Chemical Pollution", which are all reported at pH 6.

Results:

Appendix 1 delineates soil levels for 14 of the 34 elements for which we tested. Results for two elements (Aluminum (Al) and Iron (Fe)) are not included because soil levels are not correlated with toxicity. WCCA has no toxicity screening level information for a further 18 of the elements for which we have results. Results were included in the ALS-Chemex panel, but are not studied in this report. The elements that are not included are bismuth (Bi), calcium (Ca), gallium (Ga), potassium (K), lanthanum (La), magnesium (Mg), molybdenum (Mo), sodium (Na), phosphorous (P), sulphur (S), antimony (Sb), scandium (Sc), strontium (Sr) titanium (Ti), thorium (Th), thallium (Tl), uranium (U) and tungsten(W).

Soil levels for the 14 elements for which WCCA has toxicity information are reported with various thresholds. The human health threshold is perhaps the most widely accepted, although many of the ecological endpoints are much lower (plant and animal health information). Avian insectivores often appear to be the most sensitive, although the studies are somewhat controversial.

Toxicity by element:

Ind 510-13

WCCA studied the soil toxicity of 14 elements, from soil samples at targeted sites in and around Grass Valley, California. From a human health perspective, i.e. using the FoDC screening thresholds, our data points to three elements of primary concern; arsenic, chromium and lead. Tests for ten of the remaining 11 element resulted in levels of concern according to various criteria, as described below. Charts 1 through 14 delineate the results.

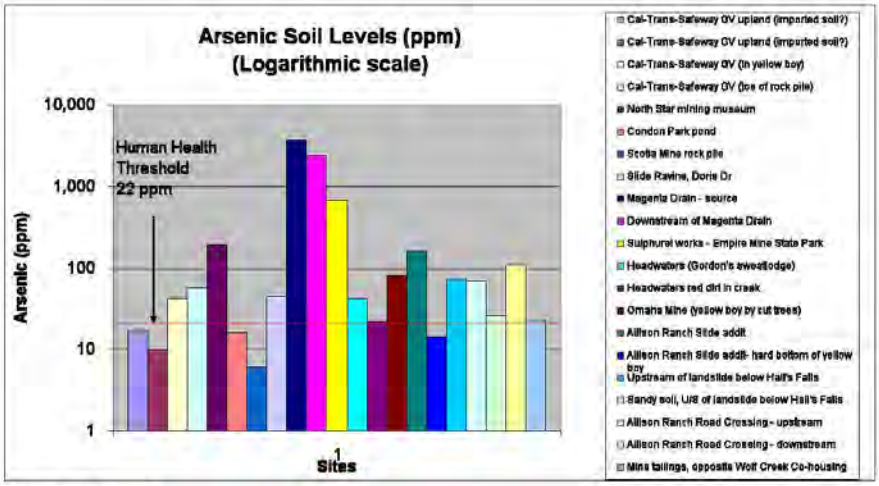


Chart 1: Arsenic

2

Ind 510-13

Arsenic levels in the soil exceed the human health threshold (22 ppm) at 16 of the 21 sites (76%). At two (2) sites the levels were over 100 times the threshold (2,360 and 3,670 ppm). "Environmental exposure to well water containing inorganic arsenic can result in skin hyperpigmentation or an eczematous dermatitis. Arsenic is listed as a presumed carcinogenic substance based on the increased prevalence of lung and skin cancer observed in human populations with multiple exposures (primarily through industrial inhalation). " (http://emedicine.medscape.com).

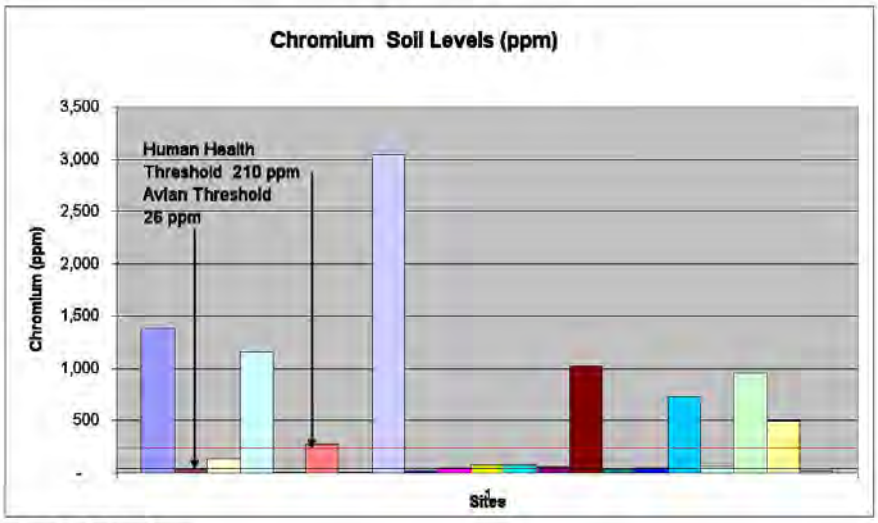


Chart 2: Chromium

Chromium levels exceeded the human health threshold (210 ppm) at eight (8) of the sites (38%). Four of these sites had levels over 1,000 ppm. Levels at an additional 9 (nine) exceeded the lowest (avian) threshold (26 ppm. The Cr(III) threshold ranges from 26 to 780 ppm (avian), and from 34 to 380 ppm (mammals). The Cr(VI) mammalian threshold ranges from 130 to 1,400 ppm. Cr(VI) degrades to Cr(III). Typical background levels in the Western US are 50 ppm. Our tests did not distinguish between Cr(III) and Cr(VI). Cr(III) is an essential dietary nutrient. Its deficiency in the body has been associated with diabetes, infertility, and cardiovascular disease. Cr(VI) is carcinogenic. Cr(VI) degrades to Cr(III).

Lead levels in the soil exceed the human health threshold (150 ppm) at one (1) of the 21 sites. An additional 16 exceeded the lowest (avian insectivore) level (11 ppm), or 17 of 21 (81%) exceeding the most sensitive threshold. "Lead content in soil may come from lead paint, gasoline or pesticides, landfills, or from industries such as foundries or smelters. Lead in soils raises concerns about the safety of urban agriculture. Poisoning by organic lead compounds has symptoms predominantly in the central nervous system, such as insomnia, delirium, cognitive deficits, tremors, hallucinations, and convulsions." (Wikipedia).

3

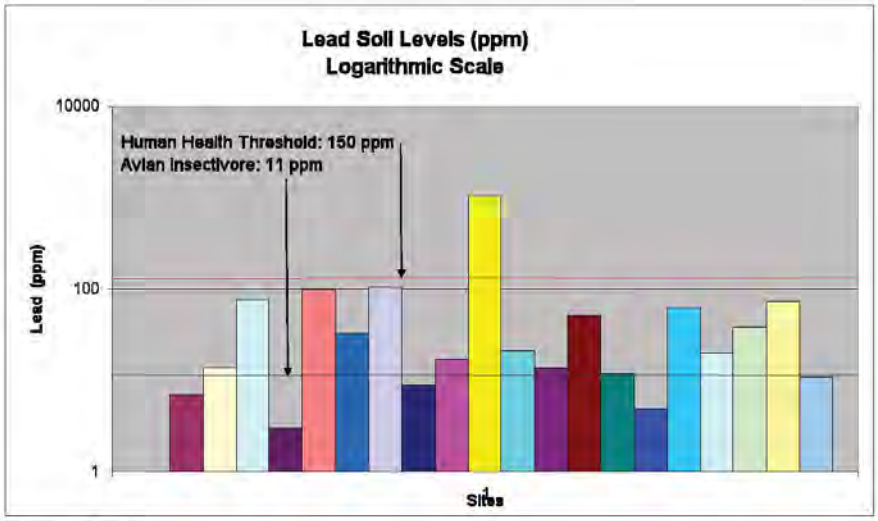


Chart 3: Lead

Ind 510-13

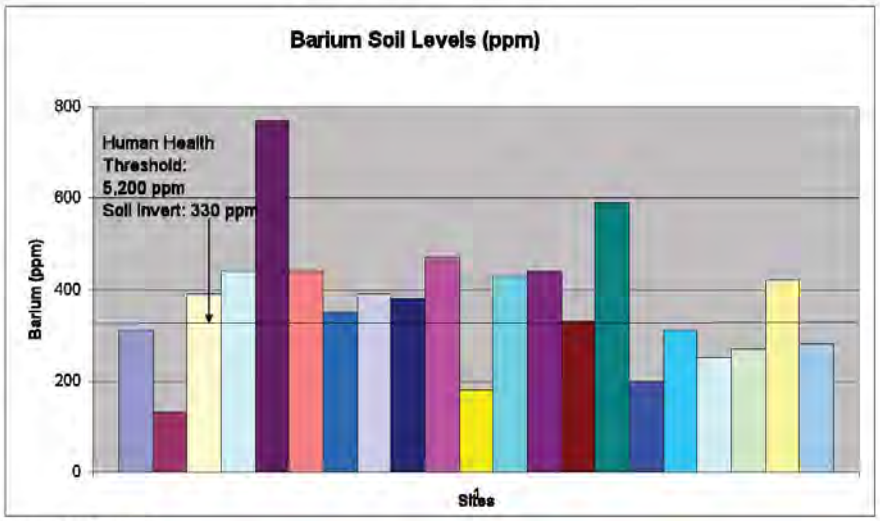


Chart 4: Barium

Barium levels were all well below the 5,200 ppm human health threshold. The most sensitive threshold of 330 ppm for soil invertebrates was exceeded in 13 of 21 samples (62%). It is of interest to note that the only other threshold found for this report is 9,100 ppm for mammalian carnivores.

4

Ind 510-13

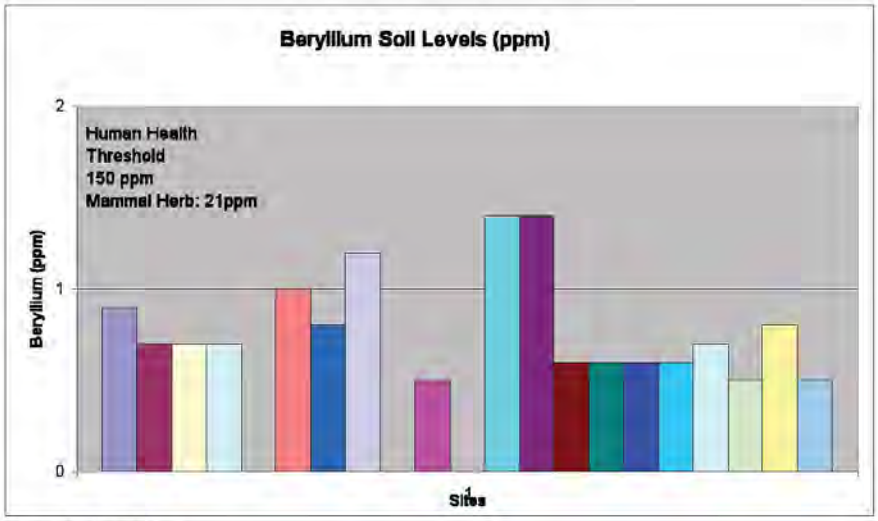


Chart 5: Beryllium

The beryllium human health threshold is 150 ppm. This was not exceeded. The mammalian herbivore threshold of 21 ppm is the lowest in this study. It was also not exceeded. This was the only element for which levels did not exceed a known threshold.

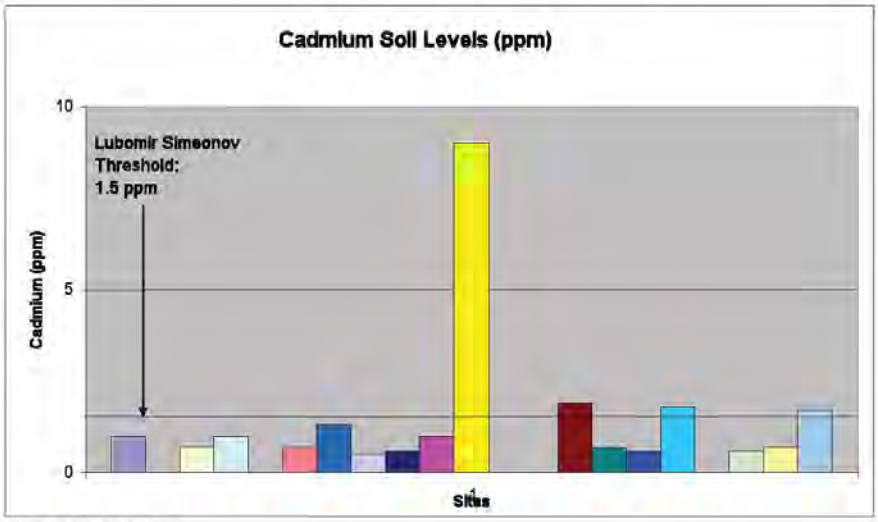


Chart 6: Cadmium

The only Cadmium threshold (2.1 ppm) came from Lubomir Simeonov. This was exceeded in four samples (19%).

5

Ind 510-13

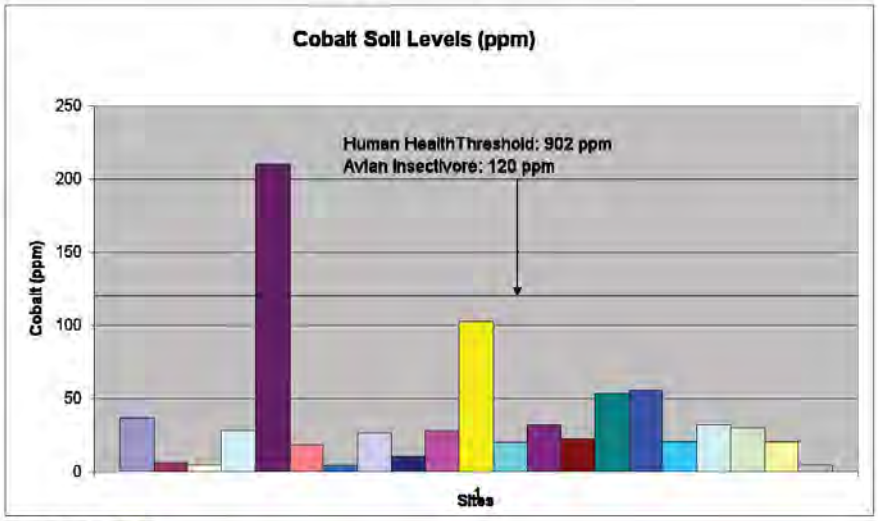


Chart 7: Cobalt

Cobalt levels in the soil did not exceed the human health threshold of 902 ppm. Levels at 1 site exceeded the most sensitive (avian insectivore) threshold of 120 ppm. Typical background levels in the Western US are 10 ppm.

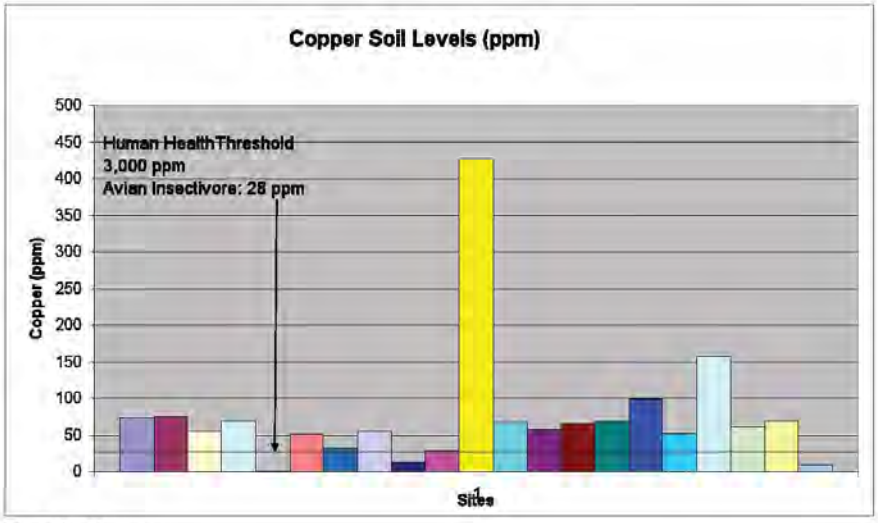


Chart 8: Copper

Copper levels in the soil did not exceed the human health threshold of 3,000 ppm. Levels at 18 sites (86%) exceeded the lowest (avian insectivore) threshold of 28 ppm.

6

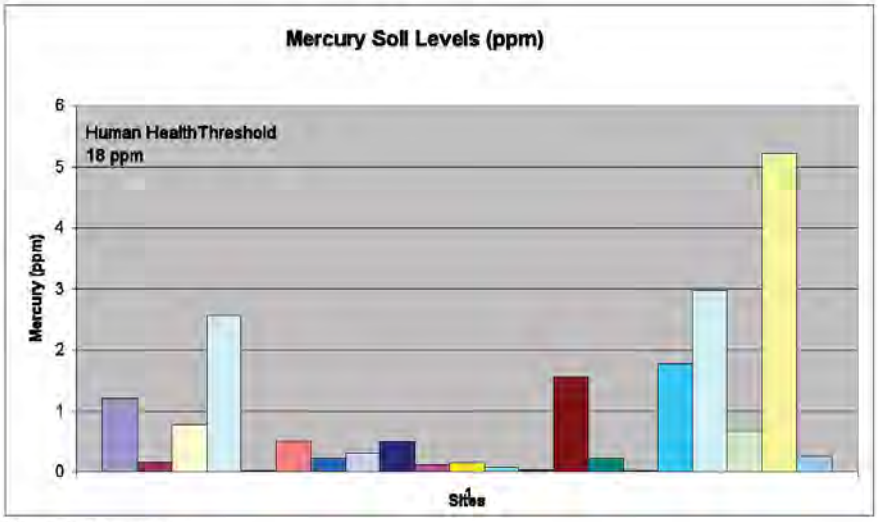


Chart 9: Mercury

Mercury levels in the soil did not exceed the human health threshold of18 ppm. Levels at 6 sites (29%) exceeded the Lubomir Simeonov threshold of 1 ppm. The toxicity of mercury depends on the bioavailability.

Ind 510-13

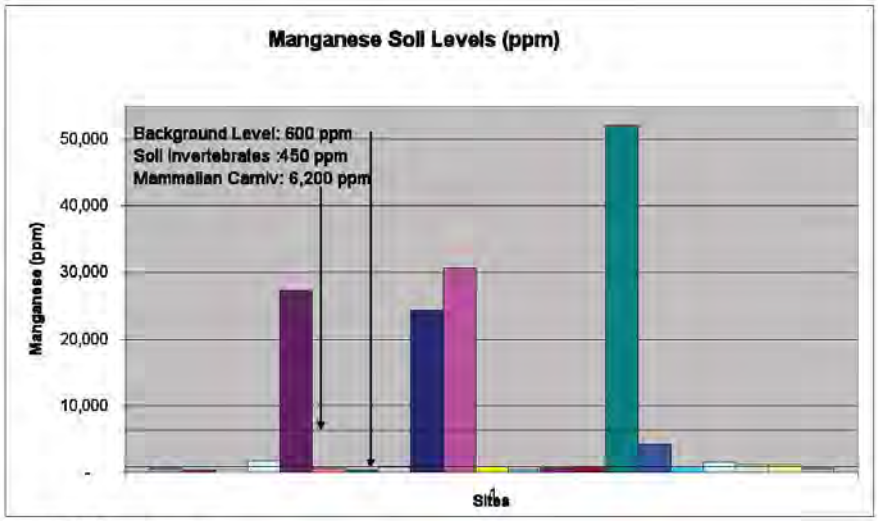


Chart 10: Manganese

This report does not contain a human health threshold for Manganese. The threshold for mammalian carnivores is 6,200 ppm. Soil levels exceeded the background level of 600

7

Ind 510-13

ppm at 15 sites (71%), substantially in four cases. The levels at the remaining six sites were very close to the listed background concentration. "Manganese is a very common compound that can be found everywhere on earth. It is necessary for humans to survive, but also toxic when too high concentrations are present in a human body." (http://www.lenntech.com/periodic/elements/mn.htm#ixzz0dl3YzU05). "Manganese toxicity may result in neurologic problems for people who inhale manganese dust. The symptoms generally appear slowly. Toxicity can result in a permanent neurological disorder with symptoms including tremors, difficulty walking, and facial muscle spasms. This is sometimes preceded by symptoms such as irritability, aggressiveness, and hallucinations." Linus Pauling Institute.

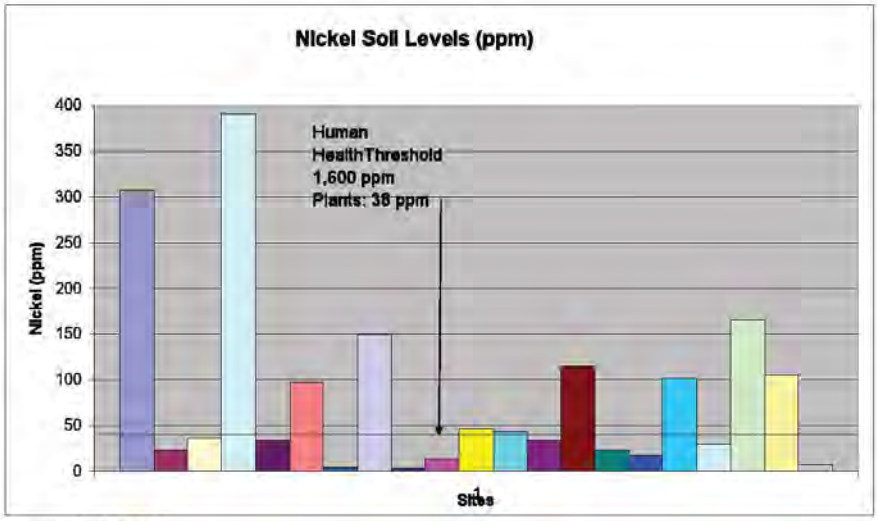


Chart 11: Nickel

Nickel levels in the soil did not exceed, nor even approach the human health threshold of 1,600 ppm. Levels at 10 sites (48%) exceeded the plant threshold of 38 ppm.

This report does not contain a human health threshold for silver. Silver levels in the soil did not exceed, nor even approach themammalian threshold of 990 ppm. Levels at 1 site (5%) exceeded the avian insectivore threshold of 4.2 ppm.
"Ingestion, inhalation, or dermal absorption of silver may cause argyria, the most common indicator of long-term exposure to silver or silver compounds in humans. Argyria is a permanent discoloration of the skin that is not toxic but is considered cosmetically disfiguring." http://cira.ornl.gov/documents/SILVER.pdf

8

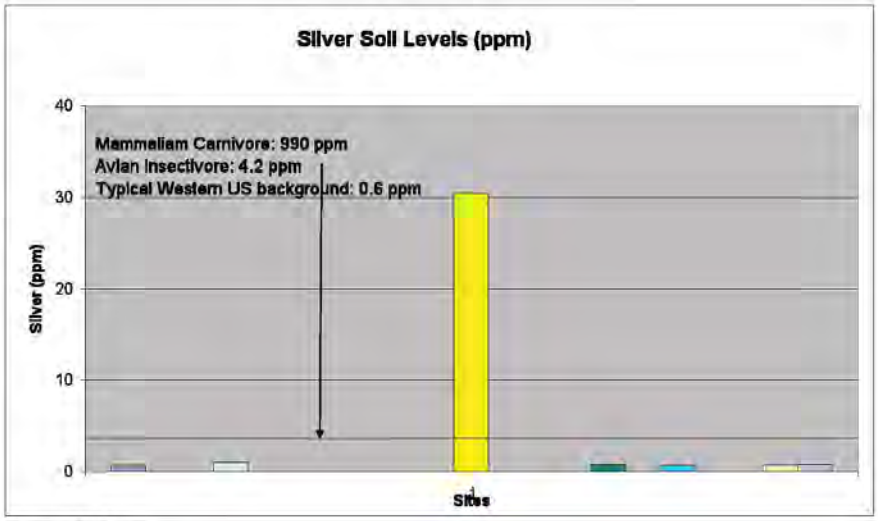


Chart 12: Silver

Ind 510-13

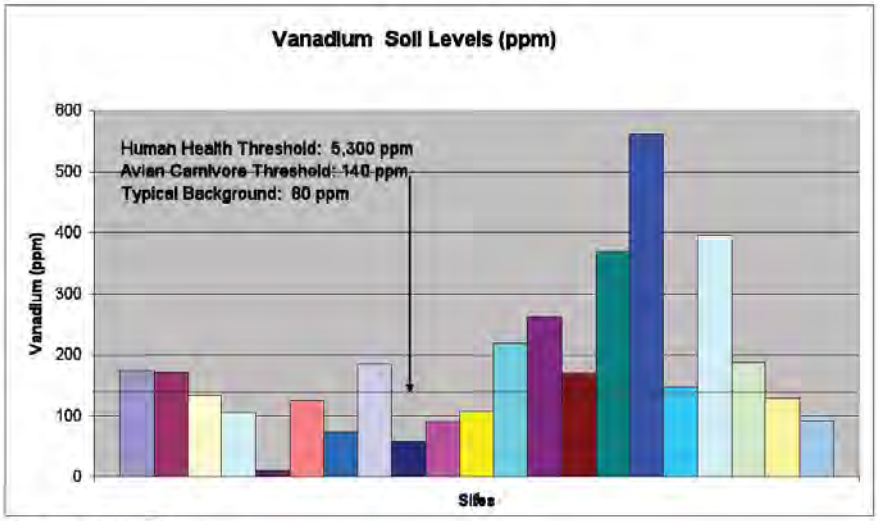


Chart 13: Vanadium

Vanadium levels in the soil did not exceed the human health threshold of 5,300 ppm. The most sensitive levels were for avian herbivores (13 ppm) and avian insectivores (7.8 ppm). These thresholds were below typical Western US levels of 80 ppm, and were therefore not scrutinized. The next most sensitive threshold is for avian carnivores, at 140 ppm. This level was exceeded at ten sites (48%).

9

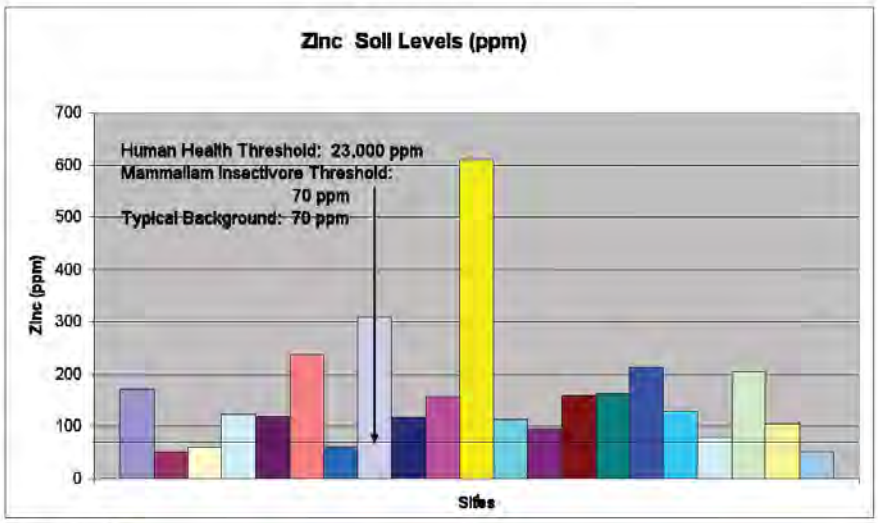


Chart 14: Zinc

Ind 510-13

Zinc levels in the soil did not exceed the human health threshold of 23,000 ppm. The most sensitive level is for avian insectivore (43 ppm) which is below typical Western US levels of 70 ppm, and was therefore not studied. Levels at 17 sites (81%) exceeded the next lowest (mammalian insectivore) threshold of 70 ppm.

Toxicity by site:

- Of the twenty-one soil test sites, eighteen sites had toxic levels of either arsenic and/or chromium above the human health threshold.
- One site had toxic levels of lead, exceeding the using the human health threshold.
- Just three sites tested below the human health thresholds for these three elements (Ar, Cr, Pb).
- All sites tested above the most sensitive toxic thresholds for between three and eight elements (in addition to arsenic, chromium and lead).

The least toxic samples are from the Cal-Trans site sampled next to the yellow-boy (#2), the Scotia Mine rock pile (#12) and the mine tailings opposite Wolf Creek co-housing (#21). The sites of most concern include the Cal-Trans site sampled at the toe of the rock pile (#4), two Magenta Drain sites (9 and 10), the Sulphuret Works at Empire Mine State Historic Park (#11), Omaha Mine (14), two sites upstream of the Allison Ranch slide addit (17 and 18) and the downstream Allison Ranch Road crossing site (20). The remaining nine sites are of concern, but not top priority at this time.

Cal-Trans property behind Safeway Grocery Store in Grass Valley (samples 1 through 4):
There is a small tributary with yellow substrate flowing into Wolf Creek from the Cal-Trans easement located across Wolf Creek from the Safeway store in downtown Grass Valley. We took four samples at this site, #1 upland as a background sample, #2 next to the yellow tributary, #3 in the yellow substrate of the tributary, and #4 upland in the toe of the large Cal-Trans rock pile. The yellow substrate material (#3) tested slightly high for arsenic (42 ppm) and slightly above thresholds for four other elements (Ba, Cr, Cu,

10

Pb). The area just adjacent (#2) tested slightly high for just two elements (Cr, Cu), and is the site with the least toxic test results of all our 21 samples. The upland soil was very high in Chromium (1,380 ppm vs. 210 ppm human health threshold), as well as having slightly elevated levels of five elements (Cu, Hg, Ni, V, Zn). Site #4, at the toe of the Caltrans rock pile tested to be the most toxic of the Caltrans sites, and one of the most toxic of all the sites we sampled. There were elevated arsenic *and* chromium levels, as well as slightly toxic levels of seven other elements (Ba, Cu, Hg, Mn, Ni, Pb, Zn). Chromium and manganese levels were of particular concern. The only consistencies in this area were non-toxic levels of beryllium, cadmium and cobalt, and all four sites had toxic levels of chromium and copper.

North Star Mining Museum Grass Valley (sample 5):
Sample #5 tested high for arsenic (197 ppm) and manganese (27,300 ppm). It was also above toxic thresholds for three other elements (Ba, Co, Zn). This is one of the least toxic sites, although the arsenic and manganese levels are of particular concern.

Condon Park Pond (sample 6):
The Condon Park pond is one of the five sites that does not have toxic levels of arsenic that exceed the human health threshold of 22 ppm. It does have slightly toxic levels of Chromium (270 ppm), and levels above the most sensitive thresholds for five other elements (Ba, Cu, Ni, Pb, Zn).

Ind 510-13

Scotia Mine rock pile (sample 7):
Sample 7 is one of only three sites that does not have toxin levels that exceed the human health thresholds It does have levels above the most sensitive thresholds for three elements (Ba, Cu, Pb). This is one of the least toxic sites we sampled.

Slide Ravine at Doris Drive (sample 8):
Sample 8 has arsenic and chromium levels that exceed the human health thresholds, the chromium level substantially. It also has levels that exceed the most sensitive thresholds for an additional seven elements (Ba, Cu, Mn, Ni, Pb, V, Zn). This is one of the most toxic sites we sampled.

Magenta Drain at the source (sample 9):
The Magenta Drain upstream site has the highest level of arsenic we found at 3,670 ppm. This greatly exceeds the human health threshold of 22 ppm. It also has elevated levels of Manganese at 27,300 ppm. While there is not a human health threshold listed for Manganese, the typical background level in the Western US is 600 ppm, and the threshold for mammalian carnivores is 6,200 ppm. This site has soil toxin levels above the most sensitive thresholds for two other elements (Ba, Zn). This is a site of special concern due to the very high arsenic and manganese levels.

Magenta Drain downstream from the source (sample 10):
The Magenta Drain downstream site has the second highest level of arsenic we found at 2,360 ppm. This greatly exceeds the human health threshold of 22 ppm. It also has elevated levels of manganese at 30,600 ppm. While there is not a human health threshold listed for manganese, the typical background level in the Western US is 600

11

ppm, and the threshold for mammalian carnivores is 6,200 ppm. This site has soil toxin levels above the most sensitive thresholds for five other elements (Ba, Cr, Cu, Pb, Zn). This is a site of special concern due to the high arsenic and manganese levels.

Empire Mine SHP Sulphuret Works (sample 11):
Site 11 has high levels of lead (1,030 ppm). This greatly exceeds the human health threshold of 150 ppm. The Sulphuret Works has high arsenic levels (675 ppm) that exceed the human health threshold of 22 ppm. It is the only site that was tested that has elevated Silver levels, and it has the highest cadmium levels of all the sites we tested. While there is not a human health threshold listed for cadmium, no other site had soil levels above 2 ppm, and the Lubomir Simeonov threshold is 1.5 ppm. This site has soil toxin levels above the most sensitive thresholds for five other elements (Cr, Cu, Mn, Ni, Zn). This is one of the most toxic sites we sampled.

Headwaters (Baker Property) (sample 12):
This headwaters site had arsenic levels of 42 ppm, which exceed the human health threshold of 22 ppm. This site has soil toxin levels above the most sensitive thresholds for seven other elements (Ba, Cr, Cu, Ni, Pb, V, Zn). The levels are not extremely high, although there is concern about cumulative effects of so many different toxins.

Headwaters – red dirt (sample 13):
Ind 510-13
This headwaters site is very similar to sample 12 and had arsenic levels of 22 ppm, which matches the human health threshold. This site has soil toxin levels above the most sensitive thresholds for seven other elements (Ba, Cr, Cu, Ni, Pb,, V, Zn). The levels are not extremely high, although there is concern about cumulative effects of so many different toxins.

Omaha Mine (sample 14):
Sample 14 has arsenic and chromium levels that exceed the human health thresholds, the Chromium level substantially. It also has levels that exceed the most sensitive thresholds for an additional eight elements (Ba, Cd, Cu, Hg, Mn, Ni, Pb, V, Zn). This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.

Allison Ranch Addit (samples 15 and 16):
Just upstream of the Omaha mine is a small tributary that trickles into Wolf Creek out of an addit. This is at the landslide site on Allison Ranch Road. Two samples were taken, sample 15 in the "yellow-boy" and sample 16 below the yellow-boy in the hard substrate. Sample 15 tested high for arsenic (161 ppm) and the highest of all samples for manganese (52,100 ppm). It was also above the most sensitive toxic thresholds for six other elements (Ba, Cr, Cu, Pb, V, Zn). This site is of concern due to the cumulative effects of such a high number of different toxins, as well as the toxic arsenic and manganese levels. Sample 16 is one of the few sites that did not exceed the human health threshold for arsenic. Manganese levels are elevated (4,290 ppm), and levels are also above the most sensitive toxic thresholds for four other elements (Cr, Cu, V, Zn).
Allison Ranch Road Upstream of Addit (sample 17):
Two samples were taken upstream of the Allison Ranch Addit site in different types of soil. Sample 17 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional

12

eight elements (Cd, Cu, Hg, Mn, Ni, Pb, V, Zn). This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.

Allison Ranch Road Upstream of Addit - Sandy Soil (sample 18):
The second sample taken upstream of the addit site was taken in sandy soil. Sample 18 had arsenic levels of 68 ppm that exceed the human health threshold. It also had levels that exceed the most sensitive thresholds for an additional seven elements (Cr, Cu, Hg, Mn, Pb, V, Zn).

Allison Ranch Road Crossing Upstream (sample 19):
Sample 19 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional six elements (Cu, Mn, Ni, Pb, V, Zn). This is one of the most toxic sites we sampled, based on the high levels of arsenic and chromium, and concern about cumulative effects of so many different toxins.

Allison Ranch Road Crossing Downstream (sample 20):
Sample 20 has arsenic and chromium levels that exceed the human health thresholds. It also has levels that exceed the most sensitive thresholds for an additional seven elements (Ba,Cu, Hg, Mn, Ni, Pb, Zn). This is one of the most toxic sites we sampled, based on the high levels of Arsenic and Chromium, and concern about cumulative effects of so many different toxins.

Ind 510-13

Mine Tailings opposite Wolf Creek Co-housing (sample 21):
Sample #21 tested high for arsenic (23 ppm). This is very slightly above the human health threshold of 22 ppm. It was above toxicity thresholds for four other elements (Cd, Mn, Pb, Zn). This is one of the least toxic sites we sampled.

Conclusions:
WCCA is most concerned with soil toxicity from arsenic, chromium and lead. Soil levels of these three elements were found to exceed human health thresholds. All but three of the sampling sites had toxin levels for at least one element that exceeded human health thresholds. Ten of the twenty-one sites are designated of most concern, as detailed above, due to high levels of toxins, and/or concern about cumulative affects of many different toxins.

Next Steps:
Since preliminary testing reveals toxic conditions in the watershed, further testing is indicated. Comparison with background conditions in nearby locations would provide important information. Outreach to landowners regarding clean-up technologies and possible funding sources will be critical in repairing this damage to our watershed.

Thank you to the Rose Foundation for their generous funding of this work.

13

Ind 510-13



← Figure 1: "Yellow-Boy" at the Allison Ranch Road slide area.



Figure 2: → Magenta Drain



← Figure 3: North Star Mining Museum Tributary



Figure 4: → Omaha Mine area

Ind 510-13

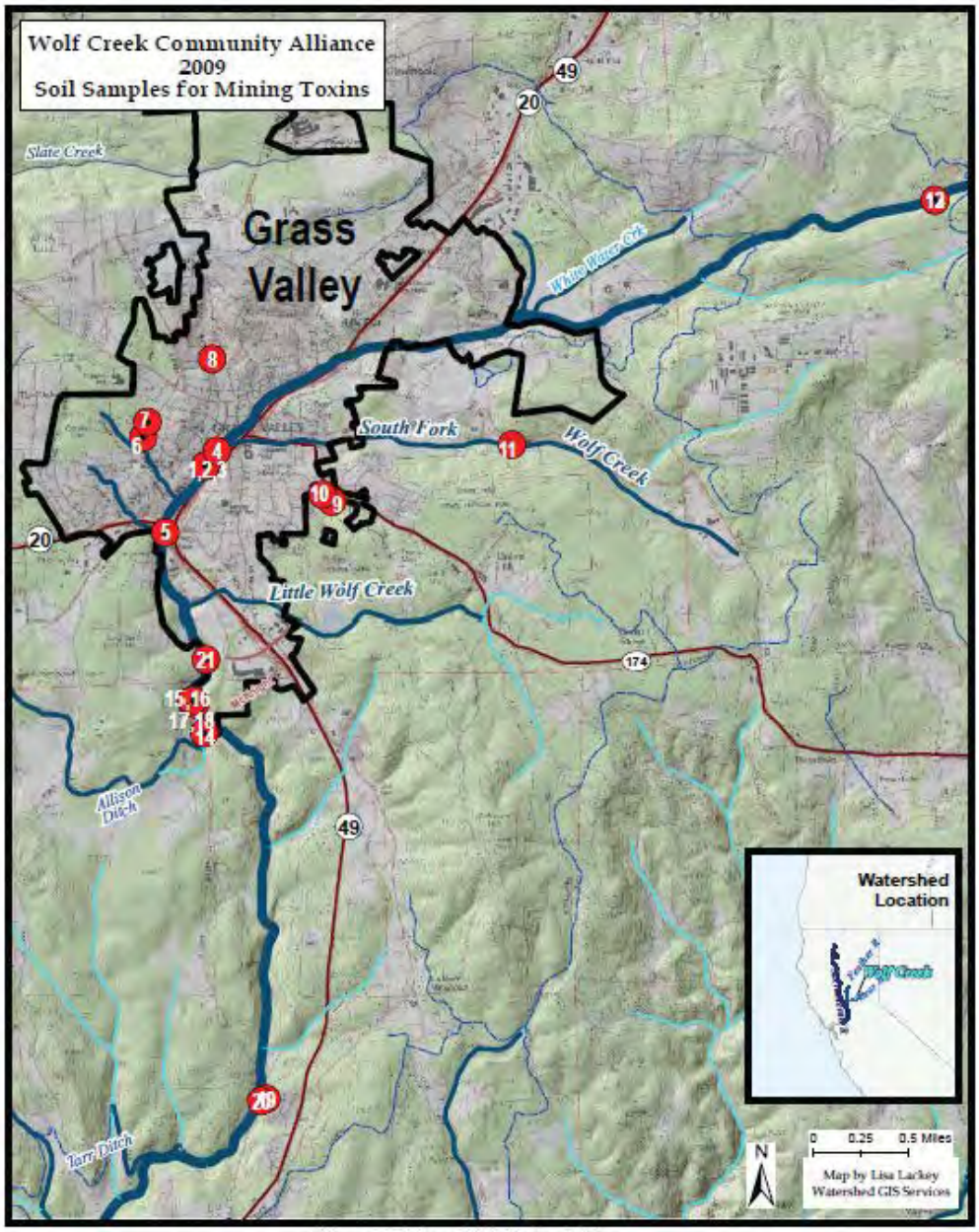


Figure 5: Map of Soil Test Sties

INDIVIDUAL LETTER 510: LOUISE JACKSON

Response to Comment Ind 510-1
This is an introductory comment. Responses to specific comments are provided below.

Response to Comment Ind 510-2
Please see Master Response 23 - Adequacy of Asbestos Sampling.

Response to Comment Ind 510-3
Please see Master Response 23 - Adequacy of Asbestos Sampling.

Response to Comment Ind 510-4
Please see Master Response 23 - Adequacy of Asbestos Sampling, Master Response 9 - Historical Mine Waste at Centennial Site, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 510-5
An outcrop refers to an outcrop of bedrock. Historic tailings are not an outcropping of rock but rather the remaining material from historic mineral processing. Accordingly, the language cited by the commenter does not indicate an inconsistency.

Response to Comment Ind 510-6
Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos. NSAQMD will have authority over implementation of the ADMP to ensure that Rise complies with the conditions and requirements of the ADMP and NSAQMD also has authority to bring an enforcement action in the event of non-compliance.

Response to Comment Ind 510-7
Please see Master Response 23 - Adequacy of Asbestos Sampling, and Response to Comment Ind 510-6.

Response to Comment Ind 510-8
Please see Response to Comment Ind 510-6, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 510-9
Please see Response to Comment Ind 510-8. The DEIR's analysis of asbestos exposure impacts was conducted in a conservative and thorough manner and the mitigation provided adequately

reduces this impact to a less than significant level. As such, recirculation of the DEIR based on asbestos impacts is not required.

Response to Comment Ind 510-10

The commenter asserts that Wolf Creek is contaminated with arsenic from past mining contamination and cites a 2009 study conducted by Wolf Creek Community Alliance. This report is provided in Comment Ind 510-13. The commenter asserts that mine dewatering will scour creek banks and move sediment containing arsenic towards Grass Valley. However, a review of this study reveals that no samples in the 2009 study referenced by the commenter were from the bed or bank of South Fork Wolf Creek or Wolf Creek. Page 1 of the 2009 WCAA study describes the general methodology of the sampling for that study and states that samples were collected from "the Wolf Creek watershed" but does not state that the samples were drawn from the bed or bank of the streams. The description of each sampling site on pages 10 through 13 of the 2009 WCAA study discusses soil samples and samples from historic mine sites in the Wolf Creek watershed, but does not state that any samples were actually taken from the bed or bank of Wolf Creek or South Fork Wolf Creek. Figure 5 of the 2009 WCAA study is a map that roughly identifies sampling locations, and while Sampling Site 11 appears to be on South Fork Wolf Creek, the description for sample 11 is "Empire Mine State Historic Park Sulphuret Works" which is not located adjacent to or in the bed or bank of South Fork Wolf Creek[4]. Furthermore, the analysis of the DEIR has shown that mine water discharge to South Fork Wolf Creek will not cause substantial erosion of siltation. Please see Chapter 4.8 and Appendix K.1 of the DEIR and Master Response 36 - Flows in South Fork Wolf Creek.

Response to Comment Ind 510-11

Please see Response to Comment Ind 510-10.

Response to Comment Ind 510-12

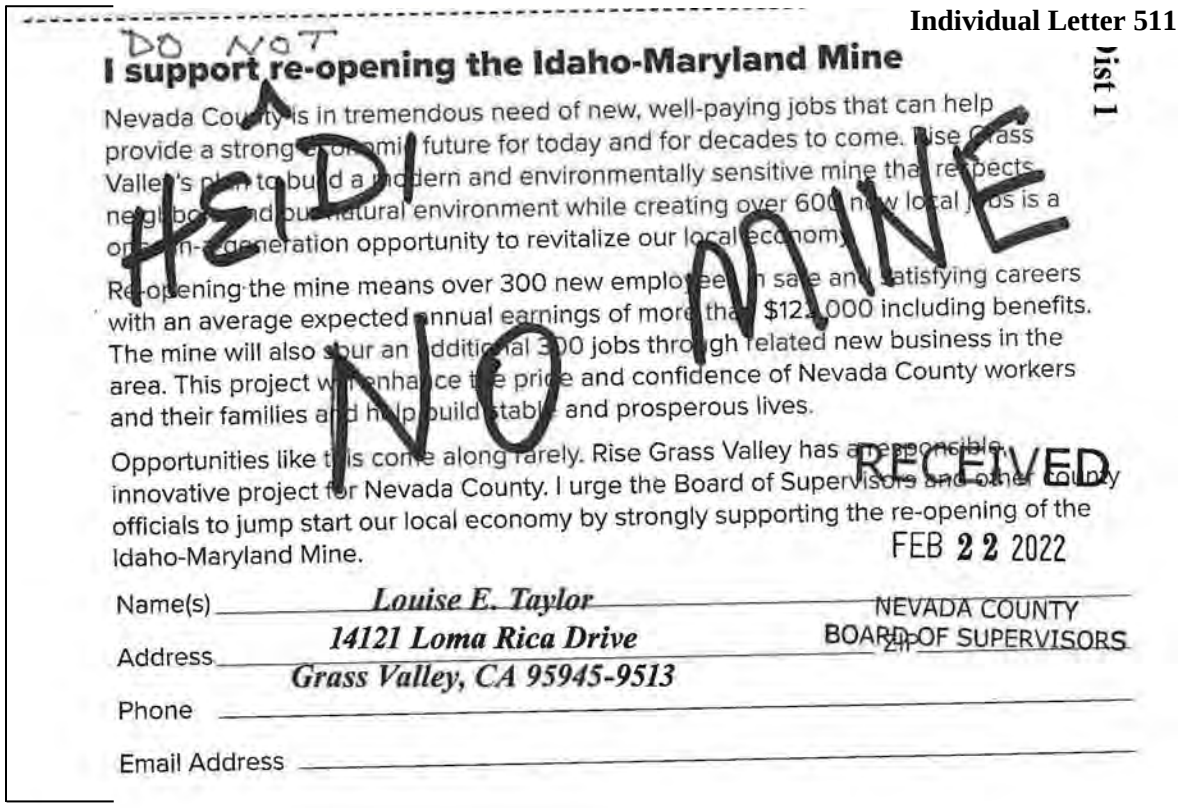
Please see Response to Comment Ind 510-10.

Response to Comment Ind 510-13

This comment reproduces a 2009 study conducted by Wolf Creek Community Alliance and does not address the adequacy of the DEIR. Comment noted.

[4] https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=29100019

Individual Letter 511



DO NOT HEIDI NO MINE

I support re-opening the Idaho-Maryland Mine

list 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $121,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other County officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) *Louise E. Taylor*

Address *14121 Loma Rica Drive*

Grass Valley, CA 95945-9513

Phone

Email Address

Ind 511-1

INDIVIDUAL LETTER 511: LOUISE TAYLOR

Response to Comment Ind 511-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 512

From: Luke Berliner <berliner.design@gmail.com>
Sent: Monday, April 4, 2022 2:56 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR Comment - Opposed to the Mine

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Hello,

As someone who was born and raised in Nevada City and then returned as an adult I came back for the vibrant town and natural beauty our county offers.

Ind 512-1 The mine is our past and not our future and is directly in contrast to where I believe our community needs to head. I am much more in favor of environmental stewardship and helping to foster a recreation based economy.

Beyond my feelings I have read through the DEIR and was surprised at a number of issues this mine would bring to our community.

Ind 512-2 Ground Water - As someone who lives very close to the proposed site and is on a well I am very concerned about the effect on the ground water around the mind and beyond. As we see more severe drought conditions every year moving forward with a project that would have long lasting negative impacts to the local water table feels like a bad idea.

Ind 512-3 Home Value - My grandparents own a beautiful home right near the mine and our family is concerned about the reduced value this will bring to their property.

Ind 512-4 Noise - We can already hear substantial noise from the airport and business park and the reported noise from the mine sounds inexcusable in an area as residentially dense.

Ind 512-5 Air quality - As someone with Asthma I'm very concerned with dust from trucks, extraction from the mine and other operations. With already moderate air quality in the county on top of increasingly poor air from the extended fire season I may have to reconsider where I chose to live.

Thank you,

Luke Berliner

INDIVIDUAL LETTER 512: LUKE BERLINER

Response to Comment Ind 512-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 512-2

Please see Master Responses 13 through 16. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 512-3

The comment does not address the adequacy of the DEIR. Please see Master Response 2 – Social and Economic Issues.

Response to Comment Ind 512-4

Noise is addressed in Chapter 4.10, Noise and Vibration, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Response to Comment Ind 512-5

Air quality is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required.

Individual Letter 513

From: Lynn Forbes <lynnfrbs1@yahoo.com>
Sent: Saturday, April 2, 2022 10:40 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR and the proposed mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Mr Kelly:
In college I took a class called "How to Lie With Statistics." I hated that class because math was not my super power, but the concepts served me well in my career and in how I suss out information thrown at me every day by politicians, mortgage and insurance companies, car salesmen, vitamin labels, travel brochures - you name it.

The DEIR submitted by RISE Gold for the Idaho Maryland Mine project is just such a document. It is full of positive proof that this mine makes sense via mitigations, abatements, reductions, high-tech processes and engineering practices.

Ind 513-1

But the real question is: Does this mine make sense for Nevada County now and 80 years out? Do we place the next almost century of our community in the hands of people and a system that *by default* impacts water, air, energy usage, noise pollution, and more disruption than I will list here because you already know all of it.

We all develop a way to make the best decisions for our lives, for our families and for our community. Here is your chance to make the best decision for Nevada County. Read this DEIR over and over, dream about it in your sleep, think about the future and tell me - does the Rise Gold Mine make sense on any level for our precious community? I know you know - it does not.

Thank you,
Lynn Forbes
12288 Thoroughbred Loop
Grass Valley, CA 95949
415-517-6940

1

INDIVIDUAL LETTER 513: LYNN FORBES

Response to Comment Ind 513-1

Please see Master Responses 1 and 2. The commenter expresses general concerns regarding the DEIR but does not provide specifics. Thus, a detailed response is neither possible nor required.

Individual Letter 514

Matt Kelley
Nevada County Planning Department

It's hard to believe that the owner of Rise Mine is even under consideration for this project. From his resume and history he is NOT a man of character or integrity.

Ind 514-1

And my bigger concern is a Board of Supervisors who are NOT responsive to public concern. WHY don't they put this to a vote? (NOT their vote) but a public vote. Straight forward and absolute.

ANY supervisor who is in favor of this project may well find his/her career in politics at an end. I would never vote for anyone who does not respond to the cry of their constituents.

Sincerely,

M. Nyborg

M. Nyborg
14480 Craig Lane
Grass Valley, CA.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Too close to NOT mind!!!

INDIVIDUAL LETTER 514: M. NYBORG

Response to Comment Ind 514-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 3. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 515

Dist 1

RECEIVED

MAR 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Date: February 22, 2022

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

Ind 515-1 I, the undersigned, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Environmental Impact Report and subsequently voting to approve or not approve the project. I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent, misleading and manipulative. They fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 515-2 I do not trust them. Look at their history, which I believe you must have done yourselves. They pollute and leave a disaster. Let's find other industries to boost our

Ind 515-3 economy. We've already driven out prior businesses, and we've done little to entice anyone to replace them.

Ind 515-4 There are many reasons this mine should NOT be reopened. My personal reasons are:

Ind 515-5 · The mine will pollute our air and increase lung disease.

Ind 515-6 · Clouds of airborne toxic mining dust including asbestos will drift downwind into Grass Valley

Ind 515-7 · If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years.

Ind 515-8 · There is serious risk to our health, our environment, our property value, and our peace and quiet.

Ind 515-9 · Hard rock mining is the single largest source of toxic waste in the United States.

Ind 515-10 · Vast amounts diesel exhaust from continuous operation, including the trucking in of explosives

Ind 515-11 · A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)

Ind 515-12	· Crushing of 1,500 tons of mine waste every day, all day, using massive machines
Ind 515-13	· Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
Ind 515-14	· Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area
Ind 515-15	· Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years, dewatering hundreds of wells
Ind 515-16	· Waste water will be dumped into South Fork Wolf Creek and destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems from the past mining operations.
Ind 515-17	· Use of over 12% of Nevada County's electricity, more than all the County businesses combined
Ind 515-18	· Numerous Rise Gold violations of mining and environmental laws in Canada and here – already
Ind 515-19	· Claims that a few hundred jobs could justify the likelihood of increased lung cancer (Nevada County currently has a surplus of unfilled job positions)
Ind 515-20	· Business life that depends on tourism will be hurt
Ind 515-21	· Homeowners stand to lose an estimated 20% in property values (and more if the well is dry)
Ind 515-22	· A working mine will damage neighborhoods with shattered peace and quiet
Ind 515-23	· Underground blasting is planned for seven days a week and will be felt by those living within the 2,585 acres of underground mineral rights the mine owns. See map!
Ind 515-24	· While Rise Gold shareholders (largely Canadian) profit, the local community gets little.
Ind 515-25	· The few theoretical jobs gained are hugely offset by the harm done. And there are several excellent suggestions in the Union to promote good jobs locally.
Ind 515-26	· Where will the imported workers live when housing is already so limited in our area? ?
Ind 515-27	· 85% of vendor spending will not be local

Ind 515-28 · Nevada County revenue will be only from property taxes, all other taxes will go to the state

Ind 515-29 The history and business practices of Rise Gold do not inspire trust

Ind 515-30 · Rise Gold has never opened a hard rock mine and has never made a profit on their business ventures to date

Ind 515-31 · Rise Gold CEO, Ben Mossman has been charged with environmental offenses in B.C. Canada courts

Ind 515-32 · There are many questions as to the financial stability of this company.

Ind 515-33 · The potential "breakout" from the mine's contaminated settling pond during one of our "atmospheric river" storms is enormous.

Ind 515-34 I am resident of Nevada County and observe that Rise Gold corporation lacks respect for the impact of their mine project on the environment and the people of Grass Valley. I hope you will be among those who will be known to have opposed the well-funded deception Rise Gold Mine has developed.

Ind 515-35 Sincerely,
Madeleine Dowd

Name: Madeleine DOWD
Address: 14023 Live Oak Lane, Grass Valley 95945-
Phone number: 530-308-6059
Email: mandmcruising@hotmail.com

INDIVIDUAL LETTER 515: MADELEINE DOWD

Response to Comment Ind 515-1
The commenter urges the County not to approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 515-2
The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 515-3
The commenter states that the County should look to other industries to do business in the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-4
The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 515-5
The commenter states that the project will pollute the air and increase lung diseases but does not provide any additional information. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is also referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 515-6
The commenter states that the project will result in toxic mining dust containing asbestos but does not provide any additional information. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is also referred to Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 515-7
The commenter states that the Idaho-Maryland Mine would operate 24 hours a day, 7 days a week for 80 years but does not state how the DEIR is inadequate. Operating times for various activities of the project are provided in Chapter 3 (Project Description) of the DEIR.

Response to Comment Ind 515-8
The commenter states the project poses serious risks to community's health, environment, and property values but offers not specific information regarding the physical impacts of the project. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. Regarding property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-9
This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

Response to Comment Ind 515-10

The commenter states that project will result in vast amounts of diesel exhaust from project-related traffic. Air emissions, including diesel exhaust from haul trucks, are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are less than significant after mitigation. The commenter is referred to Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criterion Pollution Thresholds during Operations. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

Response to Comment Ind 515-11

This comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

Response to Comment Ind 515-12

The commenter states that the project proposes to crush 1,500 tons of mine waste daily but does not comment on the adequacy of the DEIR. No crushing is proposed on surface. The commenter is referred to Chapter 3 (Project Description) of the DEIR.

Response to Comment Ind 515-13

The commenter is concerned about the project-related traffic from the Brunswick Industrial Site to the Centennial Industrial Site but does not comment on the adequacy of the DEIR. Traffic and noise impacts are analyzed in Chapter 4.12 (Transportation) and 4.10 (Noise and Vibration) of the DEIR.

Response to Comment Ind 515-14

The commenter is concerned about the project's underground blasting but does not comment on the adequacy of the DEIR. Blasting vibrations are analyzed in Chapter 4.10 (Noise and Vibration) of the DEIR and the impact is less than significant after mitigation. The commenter is also referred to Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 515-15

The commenter is concerned about the dewatering of the mine but does not comment on the adequacy of the DEIR. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 515-16

The commenter is concerned about the treated water discharged to South Fork Wolf Creek but does not comment on the adequacy of the DEIR. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek and Master Response 36 - Flows in South Fork Wolf Creek.

Response to Comment Ind 515-17

The commenter is concerned about the project's use of electricity but does not comment on the adequacy of the DEIR. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. Please also see Master Response 25 – Nevada County Energy Action Plan, and Response to Comment Agcy 8-17.

Response to Comment Ind 515-18

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 515-19

The commenter states that the project will cause lung cancer but does not comment on the adequacy of the DEIR. Air emissions from the project are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR and impacts are determined to be less than significant after mitigation.

Response to Comment Ind 515-20

The commenter states the project will negatively impact the County's tourism industry. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-21

The commenter states that the project will adversely affect property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-22

The commenter states the project will have adverse noise impacts but does not comment on the adequacy of the DEIR. Noise impacts from project's operations are determined to be less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR.

Response to Comment Ind 515-23

The commenter states that underground blasting will be felt by local residents but does not comment on the adequacy of the DEIR. Blasting vibrations are less than significant after mitigation. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR and Master Response 7 - Location of Future Mining Areas. As noted on page 4.10-44 of the DEIR, using average blasting noise levels from a comparable underground gold mine, the worst-case maximum noise levels at the nearest noise-sensitive receptors would range from 52 to 57 dBA L_{max}. The range of predicted worst-case blasting noise levels of 52 to 57 dBA L_{max} is below the daytime, evening, and nighttime dBA L_{max} criteria at the nearest receptors.

Response to Comment Ind 515-24

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-25

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-26

The commenter is concerned about available housing for workers from outside the County. As stated on page 4.9-27 of the DEIR, the project would provide employment opportunities that would result in indirect population growth. However, population growth resulting from the proposed project would not exceed the current housing stock in the area. Therefore, the project would not induce substantial unplanned population growth, and this impact would be less than significant.

Response to Comment Ind 515-27

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-28

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 515-29

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 3 - Operator Responsibility.

Response to Comment Ind 515-30

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 515-31

The commenter references the Project Applicant's reputation. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 515-32

The commenter references the financial condition of the Project Applicant. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues

Response to Comment Ind 515-33

The commenter is concerned about the potential failure of the settling pond but does not comment on the adequacy of the DEIR. The geotechnical stability of the treatment pond is analyzed in Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and required mitigations would reduce the impact to a less than significance level. (DEIR Chapter 4.6 and Appendix H.1.)

Response to Comment Ind 515-34

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues

Response to Comment Ind 515-35

The commenter provides their contact information. The comment is noted.

Individual Letter 516

From: Maile McGrew-Fredé <maileclaire@gmail.com>
Sent: Monday, April 4, 2022 1:36 PM
To: Idaho MMEIR
Subject: Comments on the DEIR for the Idaho-Maryland Mine Project

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TO: Mr Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902

FROM: Maile McGrew-Frede
10826 Red Dog Road
Nevada City, CA 95959
505-692-0766 cell

RE: Draft Environmental Impact Report for Proposed Idaho-Maryland Mine Project

April 4, 2022

Dear Commissioners,
I am a resident of Nevada County. Here are my concerns with the current DEIR for the proposed Idaho-Maryland Mine project.

The Centennial Industrial Site: First, I question the proposal to use as 'environmental baseline' the future (and still hypothetical) mitigation of this site. To do so seems to assume that the mitigation can only bring about an improvement to the environmental health and wellness of the area. However, such an assumption seems premature.

Ind 516-1

How do we know this proposed mitigation (involving excavation, concrete mixing and engineered pad creation) will result in any net gain to the health, safety and/or wellness of the land? Will this sort of mitigation function as a benefit to the ecosystem as a whole? Have there been any environmental studies or analyses measuring the current and possible long term effects of simply leaving the site as is---continuing with passive remediation, perhaps already underway at the site through the natural regrowth of forest, mycorrhizal soil networks, and native plant communities? Could it be that we are already seeing some potential mitigation happening through 'no action,' i.e. through allowing the natural world to reclaim and rewild this once toxic mess?

Perhaps the passive mitigation, through forest regrowth is providing better entrapment and/or diffusion/nullification of toxic material over time, than the proposed disruptions of excavation, concentration/capping and engineered fill may ever do? How will we know this without some studies? Perhaps the current environmental baseline is healthier for the land and community than the mitigations proposed? Have the carbon releasing effects of the proposed deforestation associated with the proposed mitigation been factored into this DEIR?

The Hydrology Report

Ind 516-2

1

Secondly, the DEIR seems to state that the only key impact of continuously dewatering 72 miles of tunnels beneath a large residential community, is the potential loss of 30 wells on Bennet Road. Isn't the number of wells that may be affected much much larger? How can this be the only potential impact?

Ind 516-3

What about harmful legacy sediments being disturbed and getting into ground water or residential wells? The mitigation efforts described in section 4.7-2(a,b) do not seem to go far enough to describe how this would be discovered and regulated. Are we simply to rely on Rise Gold and their own contractor to report the discovery of possibly contaminated soil or noxious odor?

Ind 516-4

More importantly, the mitigations in this DEIR don't address the big picture hazards. What about the potential changes to the water table as a whole? What about climate change and drought? The report is using 2019 water data (12 inches) to make its estimates for the entire operation period, but we've been seeing temperatures rise and water resources diminish consistently for many years now. How will the report take these conditions into account?

Ind 516-5

How would dewatering affect soil and vegetation in the Brunswick basin? How might it affect surrounding hydrology? Possible deleterious effects from unknown or unknowable outcomes represent potential hazards that should be thoroughly outlined in the report, possibly using past events; such as the dewatering of the North Columbia Diggins Mine on the ridge---resulting in the Grizzly Flats school losing their well (and still trucking in water to this day.)

How might dewatering affect local businesses, wetlands, streams, and/or other local water resources that our community relies upon, such as the Bitney Springs?

Ind 516-6

Thank you for taking these factors into account to further develop this DEIR.

Sincerely,
Maile Claire McGrew-Frede

INDIVIDUAL LETTER 516: MAILE MCGREW-FREDE

Response to Comment Ind 516-1

The commenter questions the approach of adjusting the environmental baseline of the Centennial Industrial Site to use the post-remediation condition instead of the existing conditions at the Centennial Industrial Site. The commenter states that the "mitigation" of the Centennial Industrial Site (i.e., engineered fill placement for potential industrial pad development) is an environmentally inferior option compared to leaving the Centennial Industry Site as is and allowing "passive remediation" (i.e., natural regrowth of forest.) Lastly, the commenter asks whether the impacts of the proposed deforestation have been factored into the DEIR.

As discussed in the DEIR, the CEQA Guidelines and the courts have recognized that measuring the baseline from the existing physical conditions at the commencement of the environmental analysis does "not always provide the most accurate and understandable picture practically possible of the project's likely impacts" (see DEIR, page 1-3). CEQA Guidelines Section 15125(a)(1) states that "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate possible of the project's impacts (*Ibid*).

The commenter conflates the Idaho-Maryland Mine Project (placement of engineered fill at the Centennial Industrial Site) with the Centennial Industrial Site Clean-Up Project (DTSC-approved remediation). Engineered fill at the Centennial Industrial Site would only proceed if the DTSC-approved remediation is completed. The commenter is referred to Master Response 4.

Regarding the commenter's preference that the Centennial Industrial Site be left as is, the DEIR addresses this with the "No Project" alternative (see DEIR, page 6-16). This alternative assumes that Centennial Industrial Site would be remediated under DTSC oversight, but would remain undeveloped under the project (*Ibid*). The DEIR also describes the resulting environmental impacts to the Centennial Industrial Site under the No Project alternative (see DEIR, pages 6-16 to 6-21). Lastly, the loss of carbon sequestration resulting from 5.3 acres of tree removal at the Centennial Industrial Site was factored into the DEIR (see Appendix E.1 AQ – GHG Report, pages 353 to 355).

Response to Comment Ind 516-2

The commenter questions whether the DEIR underestimates the number of private groundwater wells that would be impacted from dewatering the mine. The commenter is referred to Master Responses 14 and 15.

Response to Comment Ind 516-3

The commenter states that the proposed project would result in harmful legacy sediments being disturbed and getting into private groundwater wells. The commenter does not describe the source of the harmful legacy sediments being disturbed and getting into groundwater and residential wells. Because the mining activities would only lead to the drawdown of groundwater and do not provide recharge to the domestic wells, the mining activities at the project site should not affect the water quality of the domestic wells (see DEIR, Appendix K.8, page 14). Please also see Response to Comment Grp 25-30 regarding legacy contaminant concerns.

The commenter asks if the applicant would be required to report the discovery of possibly contaminated soil or noxious odor but does not provide information on where this soil or odor would be derived. Sediments and deleterious constituents in mine water would be removed by the water treatment plant before discharge to South Fork Wolf Creek. The commenter is referred to Master Response 35. Chapter 4.7 of the DEIR discusses and analyzes existing contaminated soil at the Brunswick site. Odors are analyzed under Impact 4.3-3 of the DEIR, which discusses odors and concludes the project would not have the potential to result in emissions leading to odors, which could adversely affect a substantial number of people (see DEIR, pages. 4.3-84 to 4.3-86). Regarding the reliance on the operator to report contaminated soil or noxious odors, the commenter is referred to Master Response 3.

Response to Comment Ind 516-4

The commenter states that the DEIR fails to examine several impacts, specifically the impact to the water table, and fails to take into account drought and climate change.

The DEIR analyzes the impacts to groundwater, including the potential impacts to the groundwater table. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality) as well as Appendix K.2 (Groundwater Hydrology and Water Quality Analysis) and Appendix K.3 (Groundwater Model Report). Regarding the project's impacts on climate change, the commenter is referred to Master Response 16.

Response to Comment Ind 516-5

The commenter asks how the dewatering of the mine would affect soil and vegetation in the area as well as the surrounding hydrology. The DEIR discusses the dewatering effect on surrounding hydrology in Chapter 4.8 (Hydrology and Water Quality) and Appendices K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The dewatering effect on soil moisture and vegetation is discussed on page 4.13-21 or the DEIR. The commenter is also referred to Master Response 33. The commenter states that possible deleterious effects from unknown or unknowable outcomes represent potential hazards that should be thoroughly outlined in the report but does not specify what these outcomes or deleterious effects are. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 516-6

The commenter asks how the dewatering of the mine would impact local businesses, wetlands, streams, and/or other local water resources. The dewatering of the mine and its impacts on local business, wetlands, streams, and other water resources is analyzed in the DEIR. The commenter is referred to Chapter 4.8 and Appendices K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The commenter also invokes Bitney Springs as a local water resource that may be impacted by the project. However, Bitney Springs is located approximately four miles from the project site and well beyond the simulated drawdown from the project. Therefore, Bitney Springs would not be impacted by the project.

Individual Letter 517

From: Maile McGrew-Fredé
To: BOS Public Comment
Subject: Say NO to RISE GOLD
Date: Monday, February 28, 2022 10:49:33 AM

Dist 1

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Dear Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

Thank you for serving as representatives of the people of Nevada County.

I feel certain you are each very kind, savvy and knowledgeable people, who are sincerely looking out for Nevada County, for its communities, critters, land, air, water...all of us, and our collective future.

That is why I have hope that even though Ben Mossman and his speculative company, Rise Gold have been allowed to come this far--- to purchase the land, own the mineral rights, test and explore and now propose a highly impactful hard-rock mining operation in the middle of our pastoral residential community, ***you are prepared to stand firm and simply say NO, not now, not ever, not in Nevada County.***

Ind 517-1

If I had to choose what I believe to be the absolute ***worst*** of the vast array of terrible, obnoxious, harmful and polluting impacts and outcomes this project is expected to have (using Rise Gold's own documents), I would have to say it is the plan to use vast quantities of our precious groundwater as a *waste product*; set to be flushed, 'treated' and dumped, into Wolf Creek at the rate of millions of gallons each day. This won't happen just once, but is foundational to the project, and will go on each day, every day, for the next 80 years!

How can we even be considering such a thing in this moment, this current moment in which we are finally beginning to understand the depth of our environmental predicament--- deepening drought, species loss, forest loss and wildfire threat? Draining the shafts means *throwing away* our precious, *priceless* **water,**... but first, fouling it, stirring up hundred-plus year old sediment sleeves of legacy mining toxics such as lead, asbestos and mercury.

What's more, proposals like this one are now cropping up **all over the Sierra** simply because the price of gold has changed. This is unacceptable. The few jobs that Rise Gold is promising can never make up for the losses that will be sustained if we allow this project to go forward. We need *green jobs* in Nevada County, a green (and moist) future, not a slow sad extension of the toxic legacy that stains our past.

Let's lead the way in the Sierra Nevada by stepping away from an unsustainable, extraction-based past, and stepping into a renewable future.

Sincerely,
Maile Claire

Maile Claire McGrew-Frede
10826 Red Dog Road
Nevada City, CA 95959
505-692-0766

INDIVIDUAL LETTER 517: MAILE MCGREW-FREDE

Response to Comment Ind 517-1

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter provides general comments on groundwater, water discharge, sedimentation erosion of creek beds (stirring up legacy mining toxics), drought, species loss, forest loss, and wildfire but does not provide specific reasons as to why the DEIR is inadequate. The DEIR analyzes these issues in Chapter 4.4 (Biological Resources), Chapter 4.8 (Hydrology and Water Quality), and Chapter 4.13 (Wildfire). Please also see Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change. In addition, please see Response to Comment Grp 25-30 regarding legacy mining concerns.

Individual Letter 518

Mardi Naythons
15450 S Ponderosa Way
Grass Valley, CA, 95949
March 31, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA, 95959

Dear Mr. Kelley and Members of the Planning Department,

Ind 518-1 I am writing to express my opposition to the Draft EIR submitted for approval by Rise Gold. The report has several points which I believe are misrepresented or conclusions reached without critical scientific data.

Ind 518-2 My first concern is with the potential damage due to dewatering. Though the report says that the dewatering will affect only 7 (to 30) parcels, it could actually affect many more. One only has to look at the exhibit of all the mine tunnels under Grass Valley at the Empire Mine museum to realize that there is potential for wider damage from dewatering. Additionally, there are two clauses in the report that I find disturbing. First that provisions will only be allowed for the original parcel owners and that they will only cover damages occurring within the first 20 years and the mine is expected to operate for 80 years. If that isn't enough, think about the potential for sink holes under Grass Valley.

Ind 518-3 The report says that noise will be minimal and shouldn't affect the public. Please consider that some people are sensitive to vibration in addition to actual noise. Also, some people are generally more sensitive to noise, It is going to be 24 hours a day, There won't even be the reprieve on quiet in the evenings.

Ind 518-4 Having the trucks carrying mine tailings to be processes will create more pollution to the air. Our air quality is already amongst the worse in the state. It is not a good idea to create more pollution. All that diesel exhaust won't help the situation.

Ind 518-5 The DEIR states that the previous accumulation of contamination at the Centennial site has already been cleaned up by Rise Gold. In fact, it has not been and there is no provision or teeth for the county to make sure it is cleaned up.

Ind 518-6 Finally, though it is stated that Rise Gold has established a bond to be financially responsible for damages, their track record does not indicate that this will be guaranteed. They have not paid for damages at the Bank Island site in British Columbia due to bankruptcy.

Ind 518-7 Though this letter speaks mainly to the Draft EIR, I will close by saying that this is really the wrong industry to bring back to our area. Yes, there is mining history in Nevada County, but there is also unmitigated desecration and contamination left here by mining for us to endure forever.

Please consider all of this before granting permission for the mine.

Sincerely,
M. Naythons
Mardi Naythons

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INDIVIDUAL LETTER 518: MARDI NAYTHONS

Response to Comment Ind 518-1

The comment expresses a general opinion that the DEIR is not adequate, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 518-2

Please see Master Responses 14 and 15 regarding dewatering concerns. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns. The commenter incorrectly states that the applicant would only pay for potable water charges to impacted properties for 20 years. According to the Well Mitigation Plan, reimbursement for water charges will continue throughout the 80-year permit term of the mine unless one of the following occurs:

1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise.
2) The property is annexed into the City of Grass Valley.

As discussed in Master Response 15, a new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID's water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City which allows water wells to only be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

Response to Comment Ind 518-3

Please see Chapter 4.10, Noise and Vibration, of the DEIR, which evaluates potential groundborne vibration impacts to sensitive receptors in the project vicinity. In addition, please see Master Response 1.

Response to Comment Ind 518-4

Diesel emissions from haul trucks were addressed in the Health Risk Assessment prepared for the project. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

Response to Comment Ind 518-5

The DEIR does not state that the previous accumulation of contamination at the Centennial Industrial Site has already been cleaned up by the applicant. The commenter misinterprets the use of the adjusted environmental baseline for the Centennial Industrial Site, which is discussed in Chapter 1, Introduction, of the DEIR.

As explained on pages 1-4 through 1-6 of the DEIR, in accordance with CEQA Guidelines Section 15125(a)(1), substantial evidence exists to support adjusting the environmental baseline for the Centennial Industrial Site to use the post-remediation condition instead of existing conditions at the Centennial Industrial Site. Such adjustments will give the public and decisionmakers the most accurate and understandable picture of the proposed project's potential impacts for certain resource topics affected by landform alteration/soil disturbance activities, as discussed in the bullet points on pages 1-6 and 1-7 of the DEIR. For evaluation of other resource topics, the environmental baseline is existing conditions at the Centennial Industrial Site as those resource evaluations are less dependent on landform/soil disturbance. See also Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 518-6

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 518-7

Please see Master Responses 1 and 2. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 519

From: Margaret Joehnck <margaretjoehnck@gmail.com>
Sent: Monday, April 4, 2022 10:13 AM
To: Idaho MMEIR
Subject: Letter re: Opposing the re-Opening of the Idaho Maryland Mine

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Ind 519-1

I'm not a resident that lives close to the mine or even in Grass Valley or Nevada City, but at the southernmost end of the county in Lake of the Pines. So, why do I oppose this mine being reopened?

First, one of the main reasons for our move into Nevada County was for the ambience of Grass Valley and Nevada City- the historical and cultural activities and atmosphere. I, and my late husband, most enjoyed shopping, dining, attending musical performances, the art walks, and the farmer's markets. Since I intend to continue this tradition, something this risky should not be allowed to happen in this lovely area.

Ind 519-2

I hear that the main argument for reopening the mine is "jobs." Why would a county with a housing and a worker shortage want to risk anything to provide more jobs?

Ind 519-3

Finally, as a tax-paying citizen of Nevada County and a customer of NID, I don't want to be a part of paying to pick up the pieces if the number of wells that would be affected is severely underestimated or disaster strikes, as it did in Canada, and the company files bankruptcy leaving us with a mess.

Margaret Joehnck
12501 Wanderer Rd.
Auburn, CA 95602
530-748-5146

1

INDIVIDUAL LETTER 519: MARGARET JOEHNCK

Response to Comment Ind 519-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 519-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 519-3

Please see Master Responses 3 – Operator Responsibility, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 520

From: Margaret Vodicka <margaret_vodicka@hotmail.com>
Sent: Monday, March 21, 2022 10:58 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Comments on Idaho-Maryland Mine DEIR

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March 21, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

SUBJECT: Comments addressing the Draft Environmental Impact Report (DEIR) on the Re-Opening of the Idaho-Maryland Mine

As a long time resident of Nevada County, I am most concerned about the effects on our water that the re-opening of the Idaho-Maryland Mine will have. We are going through a major drought and the DEIR does not adequately address the threat to our water. The following needs to be addressed by outside experts not just those hired but Rise Gold.

Ind 520-1

- 3.6 million gallons of treated wastewater will be released every day into South Fork Wolf Creek for 6 months, then 1.2 million gallons a day after that.

Ind 520-2

- Mine dewatering risks depletion of our region's groundwater, impacting drought-related scarcity and the future price of water.

Ind 520-3

- Many hundreds of private wells are at risk because groundwater impacts of mining are truly unpredictable.
  - Rise Gold's claims of "zero risk to wells" are based on a flawed, privately funded hydrology study.
  - Potential well risks include: reduced output, contaminated water, or complete failure with no clear plan for a reliable or affordable replacement source.

This project will impact our local water supply and we can not afford to lose this precious resource. Further study is required to ensure we have sufficient, quality water for our community.

Ind 520-4

Sincerely,

Margaret and Milan Vodicka
14219 Rollins Park Dr.
Grass Valley, CA 95945
margaret_vodicka@hotmail.com

1

INDIVIDUAL LETTER 520: MARGARET AND MILAN VODICKA

Response to Comment Ind 520-1
Please see Master Response 35 – Discharge to South Fork Wolf Creek, Master Response 36 – Flows in South Fork Wolf Creek, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 520-2
Please see Master Responses 14 through 16.

Response to Comment Ind 520-3
Please see Master Responses 14 through 16.

Response to Comment Ind 520-4
Please see Master Responses 14 through 16 and Response to Comment Ind 520-1. The comment has been noted for the record and will be forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 521

Dist 1

February 17, 2022.

RECEIVED

FEB 18 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dear Nevada County Supervisors;

Businesses, homeowners, and conservationists in Nevada County are joining together to protect our neighborhoods, our local economy, and our quality of life from the Rise Gold proposal to re-open the Idaho-Maryland Mine. We, urge the Board of Supervisors to reject this destructive proposal and instead protect our community.

Ind 521-1

We face new environmental challenges and this project seems to be a step in the wrong direction. Our duty is to protect our land and natural resources and not exploit them to their limit. As a mother I urge you to think about what world we want for out next generations and encourage you to look at our past and at the past of this Rise Gold. This is not what we want for our community.

In gratitude for your service,

Maria Fernanda Benner

INDIVIDUAL LETTER 521: MARIA BENNER

Response to Comment Ind 521-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 522

March 21, 2022

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902

Submitted by Marion Blair 12182 Sunset Avenue, Grass Valley, CA 95945
Santa Clara Valley Water District 2006- 2021: Biologist, Vegetation Maintenance Worker, Engineering Technician, Field Operations Administrator, Vegetation Program Specialist in Vegetation Field Operations Unit. Retired.

B.S. Biology; M.S. Environmental Studies. Secondary Life Science teaching credential; Licensed California Department of Pesticide Pest Control Advisor.

Dear Matt

Ind 522-1

I have a concern that the Draft Environmental Impact Report (DEIR) is opaque in that there are reports hidden within reports, some of which are inaccessible. The following is a general example. Most sites as contaminated as the Centennial site are required by the state of California to adhere to guidelines under the California Surface Mining and Reclamation Act (SMARA). However, Rise Gold is "working with the California Department of Toxic Substances Control (DTSC) to develop a plan that consolidates, and caps contaminated soil…consistent with state and federal regulation." Therefore, the DEIR concludes, "The environmental cleanup work at the Centennial Site will be completed under the DTSC voluntary cleanup program and is not a component for review under SMARA."

Continuing along this line of concern is the overt obfuscation created by frequent references to the Department of Toxic Substances report (DTSR) for "remediation" of various impacts. That report is not completed, so it is impossible to reference it. Terms used in conjunction with these ambiguous statements such as "reasonably anticipated, expected, in the event, may, etc…" are projecting into the future, not based in reality. This is termed denial. They are vague and ephemeral, contributing to the obfuscation of the true impacts of this mining operation. Without this report, how are we to verify that there are no or there are minimal environmental impacts, as frequently stated in this DEIR? Claiming that work will be done under a *voluntary* cleanup program according to an *unwritten* report, is far from convincing.

For example, p. 1-6 in the introduction of the DEIR states: **"**The separate Centennial Clean-Up Project would be completed before implementation of project-related activities at the Centennial Industrial Site and would result in the alteration and/or removal of

certain habitats capable of supporting special-status species. Therefore, for the purposes of the analysis of biological resources, the environmental baseline for the Centennial Industrial Site has been adjusted to reflect the reasonably anticipated conditions of the site following the remediation activities (CEQAGuidelines Section 15125(a))" This is but one of many such references to remediation activities in the DEIR. What are those remediation activities? How can analysis of impacts to these biological resources be complete? Without complete analysis how can conclusions be justified without this information?

Ind 522-2

As a wildlife biologist and plant specialist I have several concerns. I question the adequacy of the survey techniques for the listed amphibians, the threatened California Red Legged Frog (CRLF) and the species of concern, the Foothill Yellow Legged Frog (FYLF). The report does not state whether the visual surveys were performed at night, which is the best time to capture and positively identify breeding CRLF. [1]

Please note that accuracy of visual surveys is weather dependent due to the breeding behavior of frogs. In 2018 three surveys were conducted by Greg Matuzak in December, which is typically breeding season and thus the best time to observe adult frogs. Rainfall history from that month indicates the following rainfall dates and amounts compared to the actual survey dates:

SURVEY DATES			RAINFALL DATES/INCHES
Dec 9-12			Dec 1- <0.5"; Dec 5- <0.25"
Dec 17-18			Dec 16-17 - <3"; Dec 23-24 - 3-4"
Dec 30			No rainfall approximate to this date

The only rain event that produced enough precipitation to trigger significant breeding behavior in the two species of frogs was December 23-24.[2] Field surveys were conducted well before and after these dates, with the likelihood of enough water for breeding to be very low. Therefore, the survey methodology is incomplete, and neither presence/absence of adults, nor for egg masses can be verified from these minimal visual surveys.

The most accurate way to sample for amphibians is environmental DNA sampling, a definitive and inexpensive way to verify species of such importance, that has been used in wildlife sampling for the past 15 years.[3] Considering global declines of amphibians in general, and rapidly shrinking habitat for the two listed species of frogs in this region of California, this technique should be used to determine absence/presence in addition to multiple presence/absence surveys that are correctly timed.

Minimizing the likelihood of the presence of listed amphibian species does not mean they aren't there and that impacts won't be significant. Table 4,4-6 states that the

likelihood of CRLF and Foothill yellow legged occurrences in the Centennial site wetlands are "low" based on historical records of the California Natural Diversity Database (CNDDB). Appendix F.2 states that there is "marginal suitable habitat for CRLF and FYLF." The DEIR minimizes impacts by stating it is "unlikely" they occur in this area. This freshwater marsh is significant habitat to many listed fauna, whether observed or not because it is a perennial aquatic resource.

Mitigation of the significance of impacts to wetlands and thus the habitat of species that depend on them is repeatedly minimized in this DEIR. The mitigation caveat presented in the DEIR of wetland impacts is: "However, in the event that the currently proposed remediation boundary limits are modified by DTSC prior to commencement of remediation, this EIR addresses the possibility that some amount of freshwater emergent marsh wetland habitat may remain on the Centennial Industrial Site post-remediation." This is another example of manipulation of information regarding true mitigation by obscuring it. As proposed mitigation to these sensitive habitats, this is unacceptable.

Ind 522-3

What is the specific quantity of "some amount"? These delineated wetlands are too important ecologically to pave over, even partially, regardless of the ability to obtain Federal permits. How do the biologists justify minimizing the environmental impacts of this mine project on the delineated wetlands of both the Centennial and the Brunswick Sites that occurs throughout the DEIR? Even drainage in ditches on the Brunswick and East Bennet ROW has potential to be amphibian habitat, as I have personally observed throughout the agricultural ditches in southern Santa Clara County.

Mitigation of impacts to the Western Pond turtle (WPT), another species of concern whose life cycle is dependent on wetlands, are inadequately mitigated. Yet, the likelihood of this being WPT habitat is listed as "high" (Table 1.1, Section 1,4).

Table 2.1, p 2-40 Summary of Impacts and Mitigation Measures states:

Ind 522-4

A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults.

Additionally, the same table states, "During the spring or early summer, females move overland up to 325 feet to find suitable sites for egg laying".

Despite spring and summer spanning many weeks, the only requirement for determining presence/absence of the WPT is one (7) day advance pre-construction survey.

New hatchlings instinctively head toward the water. There must be continuous habitat to their upland nesting areas, or hatchlings will be crushed by the trucks. There is no mention of the significance of connectivity of habitat. This is a critical time in the turtle's life cycle.

The following mitigation measures are inadequate.

If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species.
If a nest is documented during pre-construction surveys, a non-disturbance buffer shall be established, as determined by a qualified biologist, based on the location of the nest until all eggs have hatched and the juveniles have dispersed out of the.

What specific measures will be taken to allow turtles to "move out of the way?" Will operations cease temporarily, and if so, who will enforce a cessation of work?
As for the possibility of a biologist finding a nest during pre-construction surveys, if the non-disturbance buffer were to necessitate the inclusion of a roadway due to the location of the nest, what mitigation will occur?

From my experience with an active sand mine in the Bonny Doon area of Santa Cruz Mountains where critical CRLF habitat was designated by CDFW, there was simply a sign that said "Red legged frog crossing," which truck drivers ignored. I asked the on-site manager if this was a joke. He assured me this was their compliance with CEQA. How are we to trust that Rise Gold employees have any concern as to the fate of Western Pond turtles if mitigation is minimized?

Ind 522-5

The proposed mine will impact the important migratory corridors served by the habitat islands at both the Centennial and Brunswick sites, which help connect fragmented habitats for all types of wildlife: birds, mammals, amphibians, reptiles, as well as plants. An example of the DEIR minimizing this importance is the following regarding the California black rail, another species of concern. Appendix F.3 p. 18 states:

"Suitable habitat of this species occurs within the large marsh wetlands within the eastern section of the the Centennial Industrial Site where there is permanent ponding of water and dense vegetation. The species has not been documented within the Centennial Industrial Site but has been identified within 5 miles to the southeast and southwest of the Centennial Industrial Site."

Yet, the DEIR minimized the significance of this wetland's habitat value by following the previous statement with, "This species has a low likelihood of occurring within the Centennial Industrial Site." Has there been any consideration of the value of habitat connectivity for avian species?

Have the cumulative effects of impacts to these sites been considered when deciding the significance of the impacts? It is important to consider all such impacts to diminishing wetland species and riparian corridors in this foothill landscape of California

already severely degraded by previous mining, habitat loss, and drought. How does this DEIR align with the Nevada County General Plan which states "…vegetation management for the benefit of habitat preservation"?

Ind 522-6

Finally, with regards to aquatic wildlife, it should be noted that releasing large quantities of secondary treated water pumped out of the mining tunnels into Wolf Creek will have negative impacts on mollusks, invertebrates, and fish. Bio magnification will affect river otter, beaver in Wolf Creek as well as the rivers that the creek is a tributary of. These include the Bear River, Yuba River, Sacramento River, and the Delta, which is the base of the food web of one of the world's the largest fisheries. Table 4.8-2 on p 4.8-44 lists the various heavy metals and metalloids that are found in the tunnel water at current levels. However, for those that bioaccumulate such as lead, chromium, mercury, zinc, cyanide, and arsenic the column for post-treatment is left blank. Is this because secondary treatment of wastewater does not remove these? Many of them remain in the sediments removed from primary treatment, but not all. What is to prevent them from ending up in the sediments of Wolf Creek, along with other suspended metals and metalloids not removed by primary or secondary treatment? Sedimentation from runoff will also suffocate spawning gravels necessary for rainbow trout whose eggs require highly oxygenated water to survive. Metals can be ingested and absorbed by macroinvertebrates such as mollusks and insects, which are magnified up the food chain to fish, mammals, and birds. How are these conditions to be mitigated in Wolf Creek and beyond?

Ind 522-7

When impacts aren't minimized in the report, mitigation is. For example, the endangered Pine hill flannel bush, *Fremontodendron decumbens*, a rare species with a limited endemic range, may count fewer than 200 plants in three counties: Butte County, El Dorado County, and Nevada County. Ecologically, we cannot afford to lose any of these plants. To quote Calflora [4] "Locally rare plants play an important role in helping to preserve the diversity of the species, as well as the gene pool of local flora."

I believe the proposed mitigation measures for *Fremontodendron decumbens* (Pine hill flannel bush) on page 4.65 is inadequate as is the Habitat Management Plan (Appendix F-4)

Transplanting;
Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.
4. Transplant Monitoring; and
Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants, transplanting will have

been deemed successful.
5. Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)
If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken:

- *Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.*
- *Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.*
- *Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.*
- *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.*

In my experience as a vegetation program specialist for a large water agency where I planned and implemented mitigation through vegetation (riparian and wetland) restoration, *Fremontodendron* species are difficult to propagate and impossible to transplant with any significant success rate. Though the mitigation references a nursery for propagation, based on my experience it will require 3-5 years of maintenance with irrigation, for these plants to become established after planting. Yet this plan provides for only two years of monitoring.

Ind 522-8 Why is there no mention of irrigation in the maintenance of these plants? From experience, I can predict they will not survive without it. The mitigation measures described above are thus inadequate.

The following quotes from the California Native Plant Society (CNPS) support my conclusions about the inadequacy of the DEIR's proposed mitigation for this rare plant. The CNPS is the standard measured against by plant community specialists and botanist in California.

[5] "Monitoring rare plants and habitats during all phases of a project will help ensure that construction and operation activities do not encroach on protected habitat."

Ind 522-9 "The Society does not endorse alteration of naturally occurring plant communities through transplantation because the methodology for most rare plants is untested and therefore unreliable and because most past attempts have ultimately failed."

[6] "In most instances off-site compensation does not fully reduce impacts to an insignificant level because a net loss of individuals or habitat that supports a natural self-sustaining rare plant population results."
There need to be clear implementation and monitoring plans which will be provided to the appropriate regulatory agencies. I did not observe these in the DEIR, therefore, the

Ind 522-10

mitigation is inadequate. I do not believe this plant can be mitigated to an acceptable level.

According to the DEIR "The EIR determined that, at both the Centennial and Brunswick Industrial Sites, implementation of the proposed project could result in potential significant adverse effects to special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. The proposed project would also result in a significant impact to mapped streams and wetlands. However, the EIR requires mitigation in order to ensure that impacts related to the aforementioned biological resources would be reduced to less-than-significant levels."

The mitigation measures in the DEIR are INADEQUATE for this level of significant impacts. How could approving the EIR be justified in any way?

Citations

[1] US Fish and Wildlife Service Revised Guidance on Site Assessments and Field Surveys for the California Red=legged rog (August 2005)

URL: file:///C:/Users/mario/AppData/Local/Temp/CRF-Survey-Guidance%20Aug2005_FINAL.pdf

Retrieved: 02.22.22

[2] Grass Valley December 2018 Historical Weather Data

URL: https://weatherspark.com/h/m/1178/2018/12/Historical-Weather-in-December-2018-in-Grass-Valley-California-United-States

Retrieved: 02.15.2022

[3] USGS. 2018. Environmental DNA Sampling

URL: https://www.usgs.gov/special-topics/water-science-school/science/environmental-dna-edna

Retrieved: 03.05.2022

[4] Calflora; URL: https://www.calflora.org/

[5] California Native Plant Society Policy Regarding Mitigation of Impacts to Rare and Endangered Plants (Appendix A) by California Native Plant Society Rare Plant Scientific Advisory Committee *(February 1991, revised April 1998)*

[6] California Native Plant Society Rare Plant Scientific Advisory Committee *(February 1991, revised April 1998)*
URL: https://www.cnps.org/conservation/endangered-species/mitigation-impacts-policy
Retrieved 2.15.2022

Please send confirmation you have received this to:

mbhomechef@comcast.net and marionkblair@gmail.com

Respectfully,

Marion

INDIVIDUAL LETTER 522: MARION BLAIR

Response to Comment Ind 522-1

The California Surface Mining and Reclamation Act regulates surface mines in California with regard to surface mining activities occurring after January 1, 1976. (see California Public Resources Code Section 2776(c).) The Centennial Industrial Site does not have active, permitted surface mines; all mining activity on that site ceased prior to January 1, 1976, and therefore SMARA does not apply. If this project is approved, SMARA would apply prospectively to above-ground surface disturbance associated with approved project activities, not to historic mine waste on the Centennial Industrial Site.

The Department of Toxic Substances Control's primary purpose is to enforce hazardous waste laws and regulations and restore contaminated land. The Centennial Industrial Site is an identified contaminated site and the applicant has been working DTSC to identify an appropriate plan to clean-up the property.

Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Ind 522-2

Please see Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog, regarding impacts to amphibian species, and Master Response 30 - Biological Study Technical Adequacy. Foothill yellow-legged frog surveys followed CDFW protocol, including implementing VES surveys for the species. VES surveys were implemented in August 2019 and in June 2022 within three locations starting at the culvert discharge location within the Brunswick site, as well as two additional stretches downstream and no foothill yellow-legged frogs were identified within South Fork Wolf Creek. The California red-legged frog assessment within the DEIR was based on an analysis of 1) where are the closest known locations of the species from the project site (over 5 miles), 2) is there suitable upland or aquatic breeding habitat for the species within the project site, and 3) is there any likelihood that the species would move into the project site from other breeding ponds within the greater Grass Valley area. The DEIR determined that the likelihood of CRLF breeding within a highly impacted environment, such as the ponds located within the project site, is considered very low because of the historical mining impacts within the project site and the level of development within and adjacent to the project site. Given that CRLF have not been identified in the Grass Valley USGS Quadrangle, the watershed associated with the project area, or within 5 miles of the Brunswick Area, the potential for this species to occur is considered extremely low. CDFW acknowledged CRLF as a species of concern for the proposed project in their April 4, 2022 comment letter on the DEIR and did not have raise any objections to the proposed mitigation for CRLF, nor did they recommend any additional mitigation for CRLF.

Response to Comment Ind 522-3

DEIR section 4.4 conservatively assumed a greater impact than this project proposes in the event the separate DTSC clean-up project is modified such that less surface disturbance occurs. As stated in DEIR section 4.4.2 (page 4.4-3):

> The acreage of each vegetation community type at the Centennial Site is a good-faith estimate because it cannot be precisely established for the baseline condition given that the baseline has been adjusted to account for the separate remediation efforts that will be conducted under the California Department of Toxic Substances Control (DTSC) oversight pursuant to the Remedial Action Plan (RAP) prepared for DTSC approval. The vegetation community acreage estimates included in this analysis are conservative in the event that minor changes to the RAP are made prior to final approval by DTSC. DTSC, as the CEQA

> lead agency for approval of the RAP and its associated CEQA document, will separately require the applicant to mitigate impacts to sensitive habitats and species resulting from remediation activities.

Please see Response to Comment Grp 20-8 and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Individual 522-4

As noted in Mitigation Measure 4.4-2(b), in addition to allowing an identified western pond turtle to move out of the way on its own, an option is also provided that a qualified wildlife biologist with a CDFW handling permit may move an individual out of the disturbance area. As a result, if a western pond turtle is identified during a preconstruction survey, they can safely exit the disturbance area either through their own movement or by a qualified biologist. Additional detail has been added to this Mitigation Measure in the Final EIR (see below) regarding the cessation of work until the identified turtle has cleared the area, fencing to prevent access, and other protection measures to prevent reentry. Page 4.4-77, Mitigation Measure 4.4-2(b), is hereby revised as follows:

> *Western Pond Turtle*
>
> *4.4-2(b)* *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults. If the pre-construction survey does not detect western pond turtle, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species. Work in the area shall cease and fencing or other protective measures shall be employed to excluded and prevent access to the area until the identified turtle has cleared the area.*

The above change is for clarification purposes, describing protective measures to be employed in the event a turtle is found on-site. The conclusions of the DEIR have not been altered.

The commenter is also concerned about encountering turtles during ongoing operation of the mine. Pre-construction surveys and avoidance are for initial ground disturbance and construction. Following construction, natural areas will not be present within the active mining area, and as a result, turtles would not be expected to occur in the mining area.

Response to Comment Ind 522-5

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined

impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded the impact would be less than significant. The commenter also refers to Policy 13.1 of the Nevada County General Plan to imply that the project is inconsistent with this policy, but the commenter only cites a portion of the sentence out of context. Policy 13.1 states "Vegetation management for the benefit of habitat preservation or restoration shall be considered consistent with the intent of this policy." However, it does not say all existing vegetation must be preserved and managed, which the commenter implies. The project is not inconsistent with General Plan Policy 13.1. (see p. 4.4-46 of the DEIR.)

Response to Comment Ind 522-6

Please see Master Response 36 - Flows in South Wolf Creek and Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Wolf Creek, regarding the impacts to fish, discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Ind 522-7

The commenter generally questions the effectiveness of Mitigation Measure 4.4-1(a), Pine Hill Flannelbush, and specifically questions the length of monitoring/maintenance and if irrigation will be required. The commenter incorrectly notes monitoring and maintenance will only last two years. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prevented and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) provides alternative maintenance transplantation measure to help achieve success criteria.

Response to Comment Ind 522-8

Please see Response to Comment Ind 522-7.

Response to Comment Ind 522-9

Please see Response to Comment Ind 522-7. Furthermore, as noted in Response to Comment Agcy 3-5, Mitigation Measure 4.4-1(b) now requires the Project Applicant to obtain an Incidental Take Permit (ITP) from CDFW for project-related impacts to Pine Hill Flannelbush. During the consultation process with CDFW, the Habitat Management Plan, included as an appendix to the DEIR, may be revised as required by CDFW, and must be approved by CDFW prior to implementation. The measures provided in the EIR are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.

Response to Comment Ind 522-10

The commenter asserts that the biological mitigation measures are inadequate but does not specify how they are inadequate. Please Master Response 1 and the above responses to comments.

Individual Letter 523

Hello Mr. Kelly

I was reading this at the Planning Commission Public Hearing on March 22 when I ran up against my 3 minute deadline. The section in italics is a repeat, just to give context to the point I didn't get to make below it.

Ind 523-1

- *This DEIR mistakenly concludes that a few more decibels of noise in an area that is greater than what is currently tolerated seems acceptable with some "mitigating measures." Decibels are measured on a logarithmic scale, like the Richter earthquake scale, where one numeral higher on the scale is tenfold the magnification. This makes the numbers presented in this DEIR even more misleading from the start.*

  …The damage to people and to animals by noise pollution of a few decibels-- at 10 times per decimal increase-- are not insignificant. Much research has been done on the effects of noise pollution and proven that it causes stress to both humans and wildlife. In humans stress causes compromised immune systems and emotional harm, both of which can lead to illness. Noise pollution also causes physical damage to wildlife, including interrupting breeding and migration. This cannot be dismissed by manipulating simple arithmetic.

Ind 523-2

- Rise Gold's funded DEIR claims that noise will actually reduce over time, because it will be a smaller percentage of the overall noise caused by an increase of traffic volume over the years. How is that for misguided logic?!

Ind 523-3

- As a specialist in wetland ecology, I am galled by the proposal to cap over most of the fresh water marshes on these two sites, or otherwise significantly alter them. California's wetlands have already been reduced by 92% since the gold rush. Let's not allow Rise Gold to rush into decimating any more of these fragile habitats, home to rare and threatened species of reptiles, amphibians, birds, and plants.

Ind 523-4

- There are many such examples of minimization of impact in the Idaho-Marlyand DEIR. This report denies the **cumulative impacts** of almost all of these.

Ind 523-5

Best case scenario, what this DEIR minimizes and denies is incomplete and the proposed mitigations, when there are any, are inadequate start to finish of the document. Worst case scenario, the effects of allowing this mine to reopen are likely to be catastrophic even without unexpected accidents that can occur. History has shown this to be true with other mines in the area, such as the Lava Cap Mine, and the San Juan Mine.

Thank you,

Marion Blair

12183 Sunset Avenue, Grass Valley 95945

INDIVIDUAL LETTER 523: MARION BLAIR

Response to Comment Ind 523-1

As discussed on page 5 of the project's Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility is not used as a significance criterion in evaluating noise impacts. In addition, a noise source can be audible without a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

The SoundPlan Model was used to predict noise levels. The SoundPlan Model has been used worldwide for 30 years and is internationally recognized by the acoustical consulting profession as being a state-of-the-art noise prediction model. In addition, the noise technical study (see Appendix L) that used the SoundPlan to conduct its analysis and identify potential project impacts, was peer reviewed by a County retained noise consultant who concurred with the use of this modeling software. The SoundPlan model used to quantify the transmission of sound from the project area to the surrounding areas accounts for topography, atmospheric conditions, ground cover, shielding by intervening buildings, noise attenuation provided by building walls and ceilings, and vegetation (see pages 5-7 of DEIR Appendix L). Local topographic survey data was imported to develop a 3-dimensional model of not only the project site but the surrounding neighborhoods as well. (DEIR 4.10-23.)

The standards of significance utilized for this DEIR were the County's adopted noise standards, the CEQA Guidelines and Appendix G criteria, which are intended to protect residents and other sensitive receptors from the harmful and annoying effects of noise and vibration. These standards are consistent with standards recommended by the State of California for the development of community noise control ordinances. Although the noise evaluation did present information pertaining to the maximum noise generation of the project, as required by County policy, it also evaluated the effects of the project in terms of the County's average hourly noise level criteria and additionally evaluated potential impacts relative to baseline ambient noise conditions, per CEQA requirements. DEIR section 4.10.4 provides a comprehensive explanation of the standards of significance used to identify project impacts, the methodology used to make this assessment, analysis of potential impacts, and recommended mitigation measures to reduce identified impacts to a less than significant level.

The commenter complains that the logarithmic method used to quantify noise in the DEIR is misleading; however, use of the decibel scale is the widely accepted standard measurement method for noise, and is fully explained in Section 4.10.2 of the DEIR. In addition, the potential effects of noise on wildlife are addressed in Chapter 4.4, Biological Resources, of the DEIR, starting on page 4.4-74.

Response to Comment Ind 523-2

Impact 4.10-2 of the DEIR analyzed project traffic noise including onsite traffic (i.e., engineered fill placement) and off-site traffic noise (i.e., hauling material to Centennial Industrial Site.) The County General Plan Noise Element and Noise Ordinance do not have a specific policy or standard for assessing noise impacts associated with increases in off-site ambient noise levels

resulting from project-generated traffic on public roadways. As a result, the Noise and Vibration Assessment (DEIR Appendix L) and DEIR impact analysis used Federal thresholds for assessing the significance of project-related increases in off-site heavy truck traffic using federal research conducted by the Federal Interagency Commission on Noise (FICON). Based on this analysis, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 has been required to reduce this impact to a less than significant level.

The commenter also asserts that the DEIR is misleading because it states that project traffic noise will reduce as a percentage of overall ambient noise over time. As stated in the DEIR "future traffic volumes on the project area roadways would increase over time relative to existing levels due to general growth of the region. However, the project-generated truck traffic would remain constant, and would not increase over time. As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time." (DEIR p. 4.10-60.) For example, East Bennett Road, west of Brunswick Road, currently carries approximately 1,486 vehicles, and the associated noise level is 52.5 dBA. With the project contribution of 111 trucks, the noise level is expected to increase to 54.8 dBA, for a project-related change of 2.3 dB. However, if future traffic levels from cumulative development throughout the region were to increase by ten percent to 1,635 vehicles per day, and the project-related traffic remains at 111 trucks, the total transportation noise level would be 55.0 dBA, but the project-related change diminishes to 2.1 dBA. As a generic example, one truck on a road that carries 1 car per day, would be quite noticeable and would be the primary noise generator. However, if the traffic increased to 100 cars per day, or say 1,000 per day, the single truck's contribution to total noise would diminish substantially.

Response to Comment Ind 523-3

A majority of the wetlands on the Centennial Industrial Site will be removed as a resulted of the Centennial M-1 Remedial Action Plan project. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The additional wetland impacts associated with engineered fill placement at the Centennial Industrial Site were analyzed in DEIR Impact 4.4-3 and mandatory mitigation reducing the impact to a less than significant level is provided in Mitigation Measure 4.4-3(a-d).

Response to Comment Ind 523-4

CEQA Guidelines section 15130 requires an EIR to discuss cumulative impacts of a proposed project. Cumulative impacts are considered impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis includes an analysis of cumulative impacts specific to that resource. The commenter alleges that there are many examples of minimization of impact in the DEIR, but provides no specific examples. Please see Master Response 1.

Response to Comment Ind 523-5

Please see Master Response 1.

Individual Letter 524

Marisa Jackson-Kinman (AKA Marisa Laursen)
myfriendmarisa@gmail.com
909.896.2004

March 29, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Matt,

Thank you for taking great care in considering what the true potential of the Rise Gold Mine would mean for our rural community.

I have spent much time reviewing and assessing the DEIR report and considering the impact on the quality of our lives here, and find it challenging to adequately express just how strongly I oppose this affront to our community. The impacts are potentially huge, serious, and long term.

Ind 524-1

I chose to move to this community for its rural, peaceful way of life. It's beautiful scenery. The silence. The nighttime star display. The fact that it offers what my previous life in crowded, noisy, traffic-filled Southern California did not offer. The Rise Gold Mine would negatively alter the nature of our community in countless ways, many of which would only be truly recognized if this project were to come to fruition.

More specifically, here are the bullet points of some of my chief concerns and the inadequacy of the DEIR report to address them satisfactorily:

Ind 524-2

1) **Surface and groundwater water impacts are inadequately addressed in the DEIR report.**
   a) Deir only has plans to address 39 wells, when there are potentially hundreds affected
   b) What impact would this have on the already extremely high forest fire hazard, and especially when we are in the midst of a multi-year drought?

Ind 524-3

2) **Visual impacts are unmitigated in the report**
   a) There would be what amounts to a skyscraper in our beautiful forest; engineered backfill off Brunswick that is 40+ feet tall; deforestation with minimal replanting of trees, and only along road corridors; the pristine nature of our dark nighttime sky would be gone.

Ind 524-4

3) **Traffic impacts would be huge, unmitigated, unavoidable**

Ind 54-5

4) **The mine runs counter to the need to reduce greenhouse gas emissions**

a) As the residents of Nevada County strive to live in a more ecologically-conscious manner, the progress made would be obliterated by the additional greenhouse emissions by the mine.

Ind 524-6

5) **Explosives** would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.

Ind 524-7

6) **Air quality impact is inadequate in the report**
   a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.

Ind 524-8

7) **Clean-up of the Centennial site not included in the report**

Ind 524-9

I live near the intersection of Greenhorn and Brunswick, and would be facing this monstrosity each and every day. What impact will that have on our property values?

Ind 524-10

Why would I want to continue living here, with the noise, visual impacts, water impact, traffic, etc.? And why would others want to move to our community and be faced with these same issues? This is not why people move to our community and what gives it the charm that it is known for.

Ind 524-11

And if this project is approved, what would stop other mines from deciding that they can come here and do the same?

Ind 524-12

Rise Mine already went bankrupt once. How can we know definitely that they wouldn't scar our land and then go bankrupt, leaving a mess behind for future generations to deal with?

We need to consider who we are as a community. Is this mine truly in alignment with our rural lifestyle? Is this what we as a community want for our future? I say a resounding NO!

Ind 524-13

Let's consider more suitable options for the land, in alignment with who we are as a community, making use of the natural setting that is in harmony with nature while creating eco-friendly jobs.

Sincerely,

Marisa Jackson-Kinman (Laursen)
12888 Lost Lake Road
Grass Valley, CA 95945

INDIVIDUAL LETTER 524: MARISA JACKSON-KINMAN

Response to Comment Ind 524-1
The commenter's opposition of the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

Response to Comment Ind 524-2
The commenter states that the DEIR underestimates the potential number of groundwater wells impacted by the project but does not explain why. The commenter also questions how the project's hydrology impacts will affect wildfire hazards. Regarding impacts to hydrology, the commenter is referred to Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The project's impacts to wildfire are analyzed in Chapter 4.13 of the DEIR. The commenter is also referred to Master Response 6 - Wildfire Impacts, and Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 524-3
As noted by the commenter, the DEIR has determined that the project has a significant and unavoidable aesthetics impact, in part due to the engineered fill piles. (DEIR, 4.1-15.)

Response to Comment Ind 524-4
The commenter states that traffic impacts would be "huge, unmitigated, [and] unavoidable" but does not provide any additional detail. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. With the exception of two intersection impacts, one related to LOS (SR 174/Brunswick Road) and the other related to queueing (Brunswick Road/Sutton Way), all transportation impacts would be less-than-significant after mitigation required in the DEIR.

Response to Comment Ind 524-5
The commenter is concerned with the project's GHG emissions. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 524-6
The commenter is concerned about the project's use of explosives. Explosives transport, storage, and use have been found to be a less than significant impact after mitigation. The commenter is referred to Chapter 4.7 of the DEIR and Master Response 10 – Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 524-7
The commenter states that the project would worsen the air basin's already poor quality. The commenter is referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 524-8

The commenter states that the cleanup of the Centennial Site is not included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 524-9

The commenter is concerned with the project's impact on property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 524-10

The commenter expresses general concerns regarding the project but offers no information about those impacts to formulate a specific response. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 524-11

The commenter is concerned that approval of the project may lead to other mining projects being proposed in the County. Growth inducement is addressed in Chapter 5 of the DEIR and found to be less than significant. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 524-12

The commenter references the Project Applicant's prior mining projects. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 524-13

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 525



February 16, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95949

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Green,

Ind 525-1 I the undersigned, a resident and registered voter in Nevada County, am opposed to the reopening of the Idaho Maryland Mine by Rise Gold Corporation. Regarding the vote to approve or not approve the project, in addition to reviewing the Environmental Impact Report I hope you will also consider the serious concerns I and many Nevada County residents have to allowing the mine be reopened particularly by a company represented by a foreign citizen, Ben Mossman, who has no investment in the wellbeing of Nevada County, its businesses, infrastructure or citizens. In addition that person and mining company and mine he was involved with in Canada has multiple serious charges for environmental damage and endangering the health of Canadian citizens during mining operations and after abandoning that project and attempting to escape liability using that countries bankruptcy laws.

Other reasons I oppose the mine include the following:

Ind 525-2
- Introduction of toxic substances into the air and water within and adjacent to the cities of Grass Valley and Nevada City many of which substances are likely to remain environmental and health problems for decades.

Ind 525-3
- 24 hour heavy mining equipment traffic on over city and county roads posing the risk of blocking evacuation routes in the event of emergencies such as wild fire.

Ind 525-4
- Extreme wear and tear of infrastructure, including road maintenance, drainage, water quality, air quality, and many other problems related to the already strained infrastructure of Nevada County specifically within 50 miles or so of Nevada City, Grass Valley, and other local communities within and outside of Nevada County.

Ind 525-5
- Interference with recreation and tourist access to recreational areas.

Ind 525-6
- Opening the mine will require the pumping of millions of cubic feet of ground water bringing the danger of drying out residential wells and other sources of water for residents and businesses.

Ind 525-7
- Releasing contaminates into ground water and pumping contaminated water into rivers and streams contaminating the water for millions of people downstream.

Ind 525-8

- Continuous underground blasts potentially weakening old, abandoned mine tunnels and shafts possibly creating unforeseeable sink holes and other soils problems contributing to foundation problems for residential and business building, roads, trails, and creating dangerous conditions for recreational use of trails and other recreational areas.

Ind 525-9

- Potential damage to wildlife habitat and forest environments.

Ind 525-10

- Reducing availability of water available for fighting fires.

Ind 525-11

- Claims of jobs and other benefits made by Rise Gold do not bear up to scrutiny. Rise Gold's CEO's demonstrated habit of litigating itself out of responsibility for damage to local communities and reneging on contractual requirements and various promises and inability to substantiate other claims of economic benefit do not instill confidence.

Ind 525-12

As an older citizen, property owner, disabled person and advocate for persons with disabilities I am also concerned about the accessibility and other hazardous conditions opening the mine may cause for me and the many other disabled and older citizens residing in this county.

Because of these, and many other reasons, it is my opinion that it would be fiscally and morally irresponsible to approve the proposed mining project.

Sincerely yours,

Mark Fenicle

11612 POLARIS DR., GRASS VALLEY, CA 95949

INDIVIDUAL LETTER 525: MARK FENICLE

Response to Comment Ind 525-1
This comment is introductory in nature. The commenter's opposition to the project and concern regarding the Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 525-2
The commenter states that the project will release toxic substances into the air and water but does not give specific information on which to formulate a specific response. The DEIR found that impacts to air and water quality would be less than significant after mitigation. The commenter is referred to Chapters 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and 4.8 (Hydrology and Water Quality) of the DEIR.

Response to Comment Ind 525-3
The commenter states that the project-related traffic would impede an evacuation in the area. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 525-4
The commenter states that the project would strain the County's infrastructure. The project's impacts to public infrastructure are analyzed in Chapter 4.8 (Hydrology and Water Quality), 4.11 (Public Services and Utilities), and 4.12 (Transportation). For example, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

Response to Comment Ind 525-5
The commenter states that the project will interfere with recreation and tourist access to recreational areas. The project would not interfere with recreation or access to recreational areas. The commenter is referred to Chapters 4.11 and 4.12 of the DEIR. To the extent the commenter believes the project will impact the tourism industry, the commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 525-6
The commenter states that the project will have an adverse impact on private wells. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 525-7
The commenter states that the project will have adverse impacts on water quality. The commenter is referred to Chapter 4.8 of the DEIR, and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 525-8
The commenter states that the project's underground blasting may result in sinkholes or a collapse on the surface. The commenter is referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 525-9

The commenter states that the project will adversely impact wildlife. The project's impact to wildlife habitat is less than significant after mitigation. The commenter is referred to Chapter 4.4 of the DEIR.

Response to Comment Ind 525-10

The commenter states that the project will result in reduced water supplies for firefighting. The project does not reduce availability of water for fighting fires. The commenter is referred to Chapters 4.8 and 4.11 of the DEIR.

Response to Comment Ind 525-11

The commenter claims that the DEIR overstates the project's economic benefits and references the Project Applicant's prior mining projects. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 525-12

The commenter is concerned about accessibility issues and other hazards created by the project for disabled citizens. The commenter is referred to responses to specific comments above and to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 526

Dist 4

RECEIVED

FEB 17 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

February 16, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA 95949

Honorable Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, Hardy Bulluck

I the undersigned, a resident and registered voter in Nevada County, am opposed to the reopening of the Idaho Maryland Mine by Rise Gold Corporation. Regarding the vote to approve or not approve the project, in addition to reviewing the Environmental Impact Report I hope you will also consider the serious concerns I and many Nevada County residents have to allowing the mine be reopened particularly by a company represented by a foreign citizen, Ben Mossman, who has no investment in the wellbeing of Nevada County, its businesses, infrastructure or citizens. In addition that person and mining company and mine he was involved with in Canada has multiple serious charges for environmental damage and endangering the health of Canadian citizens during mining operations and after abandoning that project and attempting to escape liability using that countries bankruptcy laws.

Other reasons I oppose the mine include the following:

Ind 526-1

- Introduction of toxic substances into the air and water within and adjacent to the cities of Grass Valley and Nevada City many of which substances are likely to remain environmental and health problems for decades.
- 24 hour heavy mining equipment traffic on over city and county roads posing the risk of blocking evacuation routes in the event of emergencies such as wild fire.
- Extreme wear and tear of infrastructure, including road maintenance, drainage, water quality, air quality, and many other problems related to the already strained infrastructure of Nevada County specifically within 50 miles or so of Nevada City, Grass Valley, and other local communities within and outside of Nevada County.
- Interference with recreation and tourist access to recreational areas.
- Opening the mine will require the pumping of millions of cubic feet of ground water bringing the danger of drying out residential wells and other sources of water for residents and businesses.
- Releasing contaminates into ground water and pumping contaminated water into rivers and streams contaminating the water for millions of people downstream.

- Continuous underground blasts potentially weakening old, abandoned mine tunnels and shafts possibly creating unforeseeable sink holes and other soils problems contributing to foundation problems for residential and business building, roads, trails, and creating dangerous conditions for recreational use of trails and other recreational areas.
- Potential damage to wildlife habitat and forest environments.
- Reducing availability of water available for fighting fires.
- Claims of jobs and other benefits made by Rise Gold do not bear up to scrutiny. Rise Gold's CEO's demonstrated habit of litigating itself out of responsibility for damage to local communities and reneging on contractual requirements and various promises and inability to substantiate other claims of economic benefit do not instill confidence.

As an older citizen, property owner, disabled person and advocate for persons with disabilities I am also concerned about the accessibility and other hazardous conditions opening the mine may cause for me and the many other disabled and older citizens residing in this county.

Because of these, and many other reasons, it is my opinion that it would be fiscally and morally irresponsible to approve the proposed mining project.

Sincerely yours,

Mark Fenicle

11612 POLARIS DR., GRASS VALLEY, CA 95949

INDIVIDUAL LETTER 526: MARK FENICLE

Response to Comment Ind 526-1

This letter is a duplicate copy of Individual Letter 525. Please see comments and responses in Individual Letter 525.

Individual Letter 527

From: mark johnson <bigwoody555@gmail.com>
Sent: Wednesday, January 19, 2022 4:00 PM
To: Idaho MMEIR

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 527-1

NO MINE!
I will be in attendance for the DEIR meeting to oppose this attempt to ruin my community.
Mark Johnson

INDIVIDUAL LETTER 527: MARK JOHNSON

Response to Comment Ind 527-1

Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 528

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:57 PM
To: Idaho MMEIR
Subject: Fwd:

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---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:36 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 528-1 FALSE INFORMATION CONCERNING EVERY ITEM IN THIS DEIR. IT MUST BE DONE OVER, IN A COMPETENT MANNER. NO MINE!!!

INDIVIDUAL LETTER 528: MARK JOHNSON

Response to Comment Ind 528-1

The comment expresses a general opinion that the DEIR is inadequate, but does not provide specific examples that would allow for a detailed response. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 529

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 5:01 PM
To: Idaho MMEIR
Subject: Fwd:

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From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:55 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 529-1

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---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:32 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

NO CENTENNIAL SITE DEIR???
NO MINE!!!

INDIVIDUAL LETTER 529: MARK JOHNSON

Response to Comment Ind 529-1

The comment does not directly address the adequacy of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Individual Letter 530

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:57 PM
To: Idaho MMEIR
Subject: Fwd:

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Ind 530-1

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From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:34 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

EXTREME TAXATION OF OUR ELECTRICAL GRID?
NO MINE!!!

INDIVIDUAL LETTER 530: MARK JOHNSON

Response to Comment Ind 530-1

The comment does not directly address the adequacy of the DEIR. Energy is addressed in Chapter 4.3 of the DEIR.

Individual Letter 531

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 5:00 PM
To: Idaho MMEIR
Subject: Fwd:

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From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:54 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 531-1

did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:31 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

ASBESTOS? MESOTHELIOMA!
NO MINE!!!

INDIVIDUAL LETTER 531: MARK JOHNSON

Response to Comment Ind 531-1

The comment does not directly address the adequacy of the DEIR. Asbestos is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 22 – Conservatism used for Asbestos Assessment.

Individual Letter 532

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:55 PM
To: Idaho MMEIR
Subject: Fwd:

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From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:32 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 532-1

NO CENTENNIAL SITE DEIR???
NO MINE!!!

INDIVIDUAL LETTER 532: MARK JOHNSON

Response to Comment Ind 532-1

The comment does not directly address the adequacy of the DEIR. Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Individual Letter 533

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 5:00 PM
To: Idaho MMEIR
Subject: Fwd:

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---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:53 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 533-1

Did not get s receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:30 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

SAVE MY WATER WELL!
NO MINE!!!

INDIVIDUAL LETTER 533: MARK JOHNSON

Response to Comment Ind 533-1

The comment does not address the adequacy of the DEIR. Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 534

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:55 PM
To: Idaho MMEIR
Subject: Fwd:

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did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:31 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 534-1

ASBESTOS? MESOTHELIOMA!
NO MINE!!!

INDIVIDUAL LETTER 534: MARK JOHNSON

Response to Comment Ind 534-1

The comment does not directly address the adequacy of the DEIR. Asbestos is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 22 – Conservatism used for Asbestos Assessment.

Individual Letter 535

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:59 PM
To: Idaho MMEIR
Subject: Fwd:

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did not get s receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:53 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Did not get a receipt

Ind 535-1

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:29 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

The sound projections for the machinery operated on site of this debacle Idaho-Maryland Mine) are ludicrous and insulting to anyone, such as I, that has operated heavy machinery or that will live near the destructive enterprise.
THE DEIR MUST BE COMPLETELY REVAMPED, IN EVERY WAY.
NO MINE!!!

1

INDIVIDUAL LETTER 535: MARK JOHNSON

Response to Comment Ind 535-1

The comment expresses a general opinion that the sound projections in the noise analysis, completed as part of the DEIR, are inadequate, but does not provide specific examples that would allow for a detailed response. The noise analysis was independently peer reviewed by the County's third party consultant, Saxelby Acoustics, who requested certain revisions to the study prepared for the applicant by Bollard Acoustical Consultants. Saxelby subsequently determined that the revised noise analysis was adequate for CEQA purposes. In addition, based on the noise analysis, none of the individual or combined activities associated with long-term operations of the proposed project are projected to generate noise in excess of the applicable noise standards. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. MM 4.10-2 requires implementation of an ongoing comprehensive noise monitoring program under County oversight. If operational noise levels are found to exceed the applicable County noise standards, the County shall require cessation of the mine operations until additional engineering controls can be implemented.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 536

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:54 PM
To: Idaho MMEIR
Subject: Fwd:

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Did not get s receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:30 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 536-1

SAVE MY WATER WELL!
NO MINE!!!

INDIVIDUAL LETTER 536: MARK JOHNSON

Response to Comment Ind 536-1

The comment does not address the adequacy of the DEIR. Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 537

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:59 PM
To: Idaho MMEIR
Subject: Fwd:

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did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:51 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Did not get a receipt

Ind 537-1

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 2:56 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

The DEIR for the Idaho/Maryland Mine is flawed and extremely inadequate. This incomplete report must take all negative factors into consideration and it does not.
The recommendation to the BOS must be a negative recommendation.
The loss of value to my property will be substantial and unmitigatable. The traffic increase will be substantial and unmitigatable. The pollution to both the air we breathe and the water we drink is foreseen as substantial and unmitigatable.
PROTECT MY PROPERTY VALUES.
PROTECT MY WELL.
PROTECT OUR AIR..
PROTECT WOLF CREEK AND EVERYWHERE IT FLOWS.
NO MINE!!!
Mark Johnson
Grass Valley, Ca.

1

INDIVIDUAL LETTER 537: MARK JOHNSON

Response to Comment Ind 537-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values is outside the scope of CEQA – Please see Master Response 2. Regarding well concerns, please see Master Responses 14 and 15.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 538

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:53 PM
To: Idaho MMEIR
Subject: Fwd:

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Did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:29 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 538-1

The sound projections for the machinery operated on site of this debacle (Idaho-Maryland Mine) are ludicrous and insulting to anyone, such as I, that has operated heavy machinery or that will live near the destructive enterprise.
THE DEIR MUST BE COMPLETELY REVAMPED, IN EVERY WAY.
NO MINE!!!

INDIVIDUAL LETTER 538: MARK JOHNSON

Response to Comment Ind 538-1

Please see Response to Comment Ind 535-1.

Individual Letter 539

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:52 PM
To: Idaho MMEIR
Subject: Fwd:

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Did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 2:56 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

Ind 539-1

The DEIR for the Idaho/Maryland Mine is flawed and extremely inadequate. This incomplete report must take all negative factors into consideration and it does not.
The recommendation to the BOS must be a negative recommendation.
The loss of value to my property will be substantial and unmitigatable. The traffic increase will be substantial and unmitigatable. The pollution to both the air we breathe and the water we drink is foreseen as substantial and unmitigatable.
PROTECT MY PROPERTY VALUES.
PROTECT MY WELL.
PROTECT OUR AIR..
PROTECT WOLF CREEK AND EVERYWHERE IT FLOWS.
NO MINE!!!
Mark Johnson
Grass Valley, Ca.

INDIVIDUAL LETTER 539: MARK JOHNSON

Response to Comment Ind 539-1

Please see Response to Comment Ind 537-1.

Individual Letter 540

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 4:58 PM
To: Idaho MMEIR
Subject: Fwd:

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---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:56 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

did not get a receipt

Ind 540-1

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:36 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

FALSE INFORMATION CONCERNING EVERY ITEM IN THIS DEIR. IT MUST BE DONE OVER, IN A COMPETENT MANNER.
NO MINE!!!

1

INDIVIDUAL LETTER 540: MARK JOHNSON

Response to Comment Ind 540-1

The commenter generally asserts that there is false information throughout the DEIR but provides no specific examples to substantiate this broad-sweeping claim. Thus, no specific response is possible nor required. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 541

From: mark johnson <bigwoody555@gmail.com>
Sent: Monday, April 4, 2022 5:02 PM
To: Idaho MMEIR
Subject: Fwd:

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did not get a receipt

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:56 PM
Subject: Fwd: DEIR
To: <Idaho.MMEIR@co.nevada.ca.us>

Did not get a receipt

Ind 541-1

---------- Forwarded message ---------
From: **mark johnson** <bigwoody555@gmail.com>
Date: Mon, Apr 4, 2022 at 4:34 PM
Subject:
To: <Idaho.MMEIR@co.nevada.ca.us>

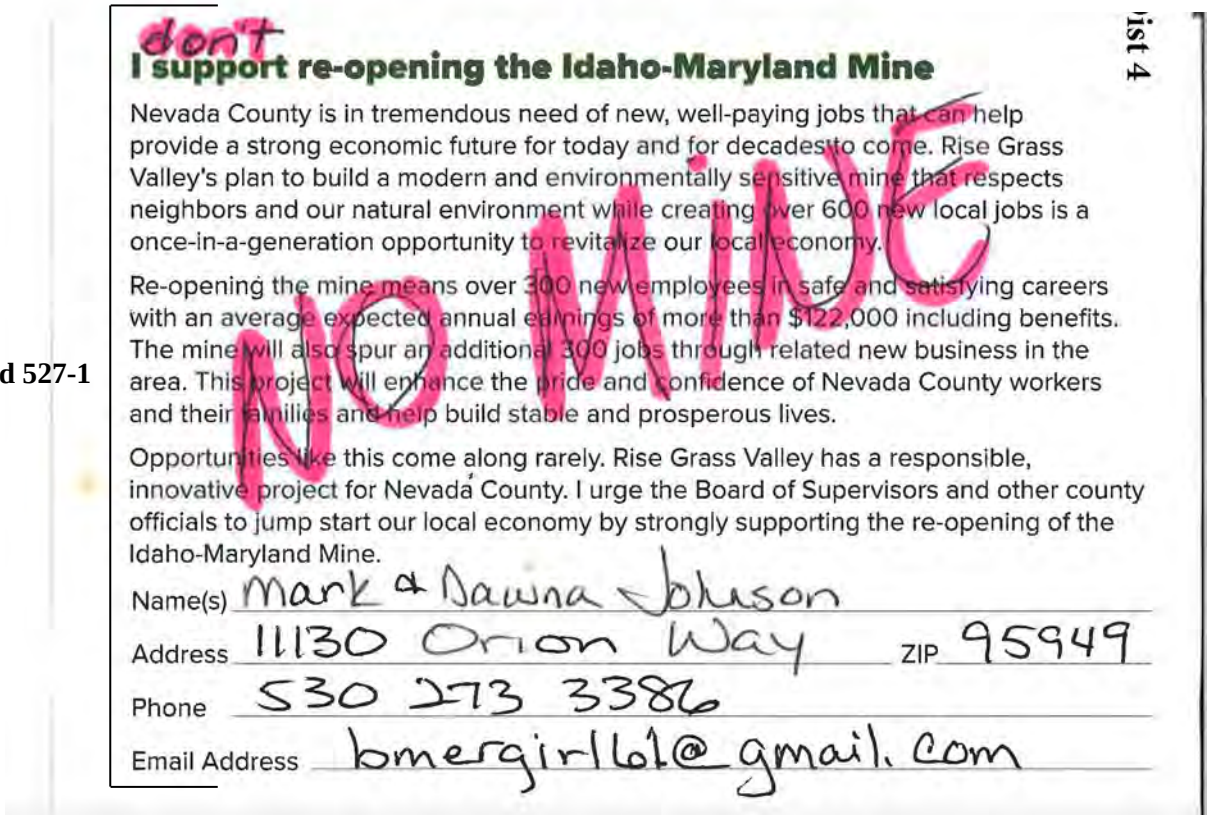
EXTREME TAXATION OF OUR ELECTRICAL GRID?
NO MINE!!!

INDIVIDUAL LETTER 541: MARK JOHNSON

Response to Comment Ind 541-1

The comment does not directly address the adequacy of the DEIR. Energy is addressed in Chapter 4.3 of the DEIR.

Individual Letter 542



don't
I support re-opening the Idaho-Maryland Mine

ist 4

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

NO MINE

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 527-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mark & Dawna Johnson

Address 11130 Orion Way ZIP 95949

Phone 530 273 3386

Email Address bmergirl61@gmail.com

INDIVIDUAL LETTER 542: MARK AND DAWNA JOHNSON

Response to Comment Ind 542-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 543

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: MARK Johnson

Address: GRASS VALLEY, CA.

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

THE D.E.I.R. FOR THE IDAHO-MARYLAND MINE RE-OPENING IS WOEFULLY INADEQUATE.

Ind 543-1

NO MINE!

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 543: MARK JOHNSON

Response to Comment Ind 543-1

The comment expresses a general opinion that the DEIR is woefully inadequate, but does not provide specific examples that would allow for a detailed response.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 544

From: Mark Machado <markmconsult@gmail.com>
Sent: Thursday, March 31, 2022 3:20 PM
To: Idaho MMEIR
Cc: Brian Foss
Subject: Comments on Rise Gold DEIR
Attachments: Rise Gold DEIR comments - Machado.pdf

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Dear Mr. Kelley:

Please see my comments relating to the DEIR for Rise Gold attached.

As a young, professional engineer, I had the opportunity to be a consultant on the drafting of more than one large EIR and as a developer, have generated my own EIR on a small project. Based on my somewhat limited experience, but experience nevertheless, I have found the whole EIR process to be inherently bias, to some unfortunate degree.

Ind 544-1 Bias in not only the process of vendor selection, where the developer is involved, but also who and how consultants and experts are selected and ultimately, who pays for it all.

I feel the main task of the authority having jurisdiction, in this case the County of Nevada, is to not only see that the generation of an EIR is complete and thorough, but in the process, reduce the appearance of that inherent bias to a level completely overshadowed by the quality of the finished EIR product.

I feel the County is up to the task and I wish you well in the endeavor.....for the sake of the community I cherish.

Thanks
Mark

P.S. Would you mind providing me an indication you received this email and attachment? Thx.

1

Mark A. Machado P.E.

13640 Kantorbery Court
Grass Valley, CA. 95945
530.559.5035 cell
markmconsult@gmail.com

3/31/2022

Matt Kelley, Senior Planner
Nevada County Planning
950 Maidu Avenue, Suite 170
Nevada City, CA. 95959-7902

RE: Comments on DEIR – Rise Gold/Idaho-Maryland Mine project

Dear Mr. Kelley:

Ind 544-2 I offer the following as my comments and/or concerns about the DEIR currently under consideration by the County. The comments are not all-inclusive, but represent my main thoughts on the subject-matter:

Chapter 4.3 Air Quality:

Ind 544-3 Nevada County currently claims a lung disease rate that's twice the State average. This chapter is wholly inadequate nor properly addresses the exposure to increased levels of asbestos, a naturally occurring substance in serpentine rock. This rock will be blown up, crushed, worked, re-worked, moved, loaded, transported and finally dumped, within 1 mile of downtown Grass Valley, surrounding residential communities and schools. Too many modes and opportunities of airborne asbestos escape for any effective mitigation.

Chapter 4.8 Hydrology:

Ind 544-4 Totally inadequate. Needs significantly more research, based on experience in California foothill communities. California's water table is dropping. Known fact. Drought is more prevalent than ever before. Moisture levels in our local soils are reducing at rapid levels, leaving our native trees and Ponderosa Pines venerable to bark beetle infestation. Protection must be afforded to the 300+ wells that are within the known sphere of influence of the proposed mine location. The potential for the hydrology modeling outlined in the DEIR to be flawed is severe. A recent example is the modeling done for the Siskon Mine on San Juan Ridge and the resulting well

tragedy. Many of those surrounding wells are still void and/or of a water quality that makes them effectively, unusable.

Chapter 4.10 Noise and Vibration:

"*Based on the above, operation of the proposed mine is not anticipated to cause damage to structures in the project area".*

Ind 544-5 *"Overall, the proposed project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels".*

"Two travelling seismographs which can change location depending on the weekly/monthly mining plan".

Phases from the Chapters noted are highlighted above. The Chapter as written is wholly inadequate, unreliable and professionally unbelievable. Should comfort be taken that the mine blasting is "not anticipated to cause damage to structures in the project area"? Absolutely not!

Ind 544-6 Should comfort be taken that the "proposed project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels"? Absolutely not! These are model projections only. Guesstimates. At 500' below the surface, does any reasonable, rational, critical-thinking individual think vibrations will not be felt from blasting? Granted, it may not "damage" a structure, but how about the mental health of residents attempting to have a relaxing, comforting, nurturing, living experience? Three mild earthquakes in the last 12 months have shown the level of anxiety that can result from such vibration and trembling.

Ind 544-7 Does anyone believe that for the next 80 years "two travelling seismographs……" will be in use that can "……change location depending on the weekly/monthly mining plan"? That's utter nonsense.

Ind 544-8 Address the noise and vibration issue from a human standpoint and the adverse effects any increase in noise and vibration will have on the human psyche and resulting behavior. Get a medical professional involved.

Chapters 4.3-5.2 Land Use and Population:

Phases from identified Chapters below.

Ind 544-9 *"It is anticipated that most of the jobs associated with the project would be filled by residents within the vicinity of the project sites."* Chapter 4.3

"The total workforce when the Idaho-Maryland Mine Project reaches commercial production is estimated at 312 persons. Therefore, the number of jobs required during

2

operation of the proposed project could draw more people to the area and result in indirect population growth as a result". Chapter 4.9-3

"The majority of workers (268 employees) would work 12 hour shifts with seven days of work followed by seven days of rest. The remaining workforce (44 employees) would work regular eight hour shifts with five days of work followed by the weekend of rest". Chapter 5.2

Ind 544-10

First phase: As a general contractor and developer for over 22 years in this County, I have found an underwhelming number of young people willing to learn a trade, willing to work hard or just be willing to work at all. This has been and continues to be a common issue with all the construction trades in this County, be it carpentry, plumbing, electrical, concrete, etc. Every subcontractor I know has serious difficulty finding people willing to learn a craft and become productive members of our community. Yes, it requires manual labor, just like a hard-rock miner would be expected to perform a task and learn a skill……..except orders of magnitude greater! In today's world, most notably in Nevada County, no high school graduate dreams of becoming a hard-rock miner, except in some immature fantasy fashion. That won't last.

Ind 544-11

Second phase: Yes, the vast majority of the estimated 312-person workforce would be from outside the area and most likely, based on the employment of individuals in the trades here locally, would be immigrants. Not locals. If locals were willing, the "Help Wanted" signs, literally epidemic throughout business storefronts in Grass Valley and Nevada City, would be non-existent or minimal at best.

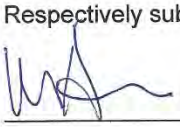
Ind 544-12

Third phase: Again, how many "locals" are going to be willing to work 12-hour shifts, seven days a week, with an alternating week off, 3000'-4000' deep in the bowels of the earth? Really? Take a look at the photos of the miners at the Empire Mine exhibit. It's a new era. My subcontractors can't even find a person willing to learn how to be an electrician or a plumber. They can work above ground, in a healthy environment, with relatively light duty, but still the searches continue with little success.

Ind 544-13

Conclusion: Get real with an honest assessment of the situation. The "jobs" argument is a trojan horse promoted by a "feel good" audience and/or politicians attempting to sound politically correct with unsupported talking points, but, in reality, has no basis in truth. Investigate further. No exceptions.

Respectively submitted,



Mark A. Machado P.E.

3

INDIVIDUAL LETTER 544: MARK MACHADO

Response to Comment Ind 544-1
The commentor states that the DEIR is biased but provides no specifics or evidence. Responses to specific comments are provided below.

Response to Comment Ind 544-2
This comment is introductory in nature. The comment is noted.

Response to Comment Ind 544-3
The commenter states that the DEIR inadequately analyzes asbestos-related impacts. The commenter raises air quality concerns but does not state how the DEIR is inadequate in addressing these impacts. Dust and air pollution concerns are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). A Health Risk Assessment was prepared for the project as described on DEIR page 4.3-61. The Project Applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR) which is designed to exclude asbestos containing material from the engineered fill produced by the project and from rock mined and processed. (DEIR, Appx. E.2.) All mined materials will be tested to ensure asbestos content does not exceed applicable standards and all engineered fill used for surfacing applications would have no detectable asbestos. The commenter is referred to Chapter 4.3 of the DEIR and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 544-4
The commenter states that the DEIR's Chapter 4.8 (Hydrology and Water Quality) is inadequate because the project will reduce moisture in soils and it underestimates the number of potentially impacted groundwater wells. The commenter is referred to Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 544-5
As stated on page 4.10-54 of the DEIR, all groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the USBM recommendations and the levels at which structural damage to buildings is possible. Nonetheless, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required (Mitigation Measure 4.10-4).

Response to Comment Ind 544-6
The commenter states that the DEIR's finding will regards to groundorne vibrations are projections only and may not be relied upon. As stated on page 4.10-54 of the DEIR, drift development blasts at the shallowest depth considered of 500 feet would be barely perceivable to the general population and undetectable by instrumentation below 900 feet in depth. Larger longhole stoping blasts at the shallowest depth considered of 500 feet would be 0.23 in/s, which is also well below the threshold level of vibration (0.4 in/s) about which less than eight percent of the population complains. The calculated ground vibration is considered insignificant. At depths below 800 feet, the ground vibration becomes unnoticeable to the general population. Untraceable vibration would occur at a depth of approximately 1,500 feet. At depths below 1500 feet, it would be expected that ground vibration would be unnoticeable. Nonetheless, as discussed above, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required (Mitigation Measure 4.10-4).

Response to Comment Ind 544-7

The commenter questions the efficacy of Mitigation Measure 4.10-4, but does not explain why. Mitigation Measure 4.10-4 requires a total of seven seismographs during blasting above the 1,000-foot level and five after blasting above the 1,000-foot level is complete. (DEIR, p. 4.10-58)

Response to Comment Ind 544-8

The commenter states the DEIR fails to analyze the noise and vibration impacts on humans. The DEIR considers noise and vibration issues from a human standpoint. The commenter is referred to Chapter 4.10 (Noise and Vibration) of the DEIR which found that noise impacts associated with long-term operation of the mine would be less than significant after mitigation. (DEIR, p. 4.10-31.) One significant and unavoidable noise-related impact was identified, but this is associated with the temporary noise generated during installation of potable water pipeline along East Bennett Road. (DEIR, 4.10-27.)

Response to Comment Ind 544-9

The commenter reproduces material from the DEIR. The comment noted.

Response to Comment Ind 544-10

The commenter speculates that young people do not want to work at the project. The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. Further, CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 544-11

The commenter is referred to Response to Comment Ind 544-10.

Response to Comment Ind 544-12

The commenter is referred to Response to Comment Ind 544-10.

Response to Comment Ind 544-13

The commenter is referred to Response to Comment Ind 544-10.

Individual Letter 545

From: Mark Seufert <maseucon@att.net>
Sent: Monday, April 4, 2022 8:31 AM
To: Idaho MMEIR
Subject: Mine Impact on local water ways

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Ind 545-1

My name is Mark Seufert , I live in Nevada City with the love of my life , Yvonne " Ronni" Navarro. I am a member of the Gold Country Fly Fishers club which tries to keep our water ways clean and protect the fish habitat to preserve for future generations. Every year we conduct fish surveys on the local creeks , I.E. wolf creek. We have the surveys available if needed. At present , Wolf creek is already a fragile water way, With beaver ponds and slow running water , the german brown trout population is very small but thriving . Not to mention the wetlands the creek creats which supply habitat for birds and animals. The introduction of this mine can only destroy what is left of the creeks we have . The drought is bad enough but I feel this will be the " Nail in the Coffin " for our creeks and streams in the mine area. From what I've read of Rise Gold's Reputation in other coiuntries, They left a wake of destroyed habitat and land behind their last mining expedition and who's to say they will not do the same here. Being a General Contractor, I know how contractors work . I pride myself on my work but sad to say , most contractors are in it for the money .They'll cut corners and do sloppy work to get the most profit. I'm dealing with this exact issue in Paradise helping my sister rebuild from the fire of 2018, Contractors not protecting the soil from concrete run off after cleaning out their concrete trucks or not completing the job and robbing the people of their money. I feel the same will happen here.

Ind 545-2

Respectfully, Mark Seufert

1

INDIVIDUAL LETTER 545: MARK SEUFERT

Response to Comment Ind 545-1

The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1. Regarding fish comments, please see Master Response 34 – Resident Fish. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 545-2

Please see Master Response 3 – Operator Responsibility.

Individual Letter 546

Dist 1

RECEIVED

: 0 9 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

March 5, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Re: Rise Gold/Idaho-Maryland Mine Environmental Impact Report

Dear Supervisors:

Ind 546-1 I am writing in opposition to the approval of Rise Gold's permit to operate the Idaho-Maryland Mine.

Rise Gold has released its draft Environmental Impact Report and claims that it shows that its operations will have no or minimal environmental impacts on our community. It would have us believe that operating a major industrial operation next to businesses, a hospital, nursing homes, and residences will have no effect on our health or quality of life. Of course, such a claim is ridiculous.

Ind 546-2 Although I've lived in Nevada County nearly 20 years, I was born and raised near Detroit, Michigan. I worked on the line at one of Chrysler's metal stamping plants. So I'm familiar with the debilitating effect industrial facilities have on a community and its quality of life. There is no such thing as "clean" industry. Noise, diesel exhaust, toxic solvents, trash, polluted streams, and more degrade the surrounding area despite a business's best efforts. And we have no indication that Rise Gold would make its best efforts to protect us.

Ind 546-3 It's important to remember that promises made in an EIR are just that—promises. Rise Gold is a penny stock with no experience in mining. The track record of their CEO, Ben Mossman, is horrific. The Canadian government had to shut down his operation in British Columbia in less than two years because of gross safety and environmental violations. Workers were left unpaid and cleanup costs well exceeded those needed to clean up their mess. Today, Mr. Mossman wants to operate a mine in Grass Valley for as long as 80 years, and the human and environmental health of the residents and wildlife of the Grass Valley/Nevada City area are on the line. We all know how unique the natural beauty of this area is. This mine will change it for the worse, forever.

I strongly urge you to turn down Rise Gold's application to operate the Idaho-Maryland mine. Please preserve the beauty and vibrancy so everyone living here can continue to enjoy and prosper in the area for generations to come.

Regards,

Mark Wilson

Mark Wilson
11650 Forest View Drive
Nevada City, CA 95959

INDIVIDUAL LETTER 546: MARK WILSON

Response to Comment Ind 546-1
The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Response to Comment Ind 546-2
The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Response to Comment Ind 546-3
The mitigation requirements identified in the DEIR are included in the mitigation monitoring and reporting program for the project (Chapter 4 of this Final EIR), and enforceable by state law. Regarding operator concerns and the generally noted concerns related to environmental health, wildlife, and natural beauty of the area, please see Master Responses 1, 2, and 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 547



March 5, 2022

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

Re: Rise Gold/Idaho-Maryland Mine Environmental Impact Report

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno:

As a twenty-year resident of Nevada County, and a homeowner, I am writing to express my opposition to the approval of Rise Gold's permit to operate the Idaho-Maryland Mine.

Ind 547-1 Rise Gold has released its draft Environmental Impact Report and claims that it shows that its operations will have no or minimal environmental impacts on our community. It would have us believe that operating a major industrial operation next to businesses, a hospital, nursing homes, and residences will have no effect on our health or quality of life. Of course, such a claim is ridiculous.

Ind 547-2 It's important to remember that promises made in an EIR are just that—promises. Rise Gold is a penny stock with no experience in mining. The track record of their CEO, Ben Mossman, is horrific. The Canadian government had to shut down his operation in British Columbia in less than two years because of gross safety and environmental violations. Workers were left unpaid and cleanup costs well exceeded those needed to clean up their mess. There is no evidence that Mr. Mossman is capable of operating a mine in Grass Valley for as long as 80 years (or even much less) without creating the same environmental destruction that he did in Canada. But we do know that when he does, it will be up to us to clean up the mess and pay for it.

Ind 547-3 Specific to the accuracy of the EIR, the air monitoring data is questionable. The air monitoring data for ozone and small particulate matter is from monitoring equipment located about a mile northwest of the project site. Rise Gold did not conduct air monitoring at the project site, or in any other direction emissions from their operations will travel. Years ago, citizen ozone monitoring conducted at various locations around the Grass Valley/Nevada City area confirmed that ozone levels vary widely here due to our topography. So it's clear that Rise Gold's use of data from a single air quality monitor is insufficient to characterize at least the ozone in our area. For other air pollutants, the EIR references a monitoring station in Yuba City—31 miles away. Conflating air quality data from a city in the Central Valley with a topographically diverse town in the Sierra foothills does not present a true picture of our current air quality.

Ind 547-4 I strongly urge you to dig deep into Rise Gold's claims in the EIR and recommend to the supervisors that they turn down Rise Gold's application to operate the Idaho-Maryland mine.

Regards,

Mark Wilson
11650 Forest View Drive
Nevada City, CA 95959

INDIVIDUAL LETTER 547: MARK WILSON

Response to Comment Ind 547-1

The commenter notes that Rise Gold claims the DEIR shows the project's operations will have no or minimal impacts on the community. The commenter is directed to the actual DEIR and its findings, which reflect the County's review of the proposed project. As indicated in the DEIR, the proposed project would result in several adverse environmental impacts, some of which would remain significant and unavoidable, even after implementation of the mitigation measures identified in the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Pursuant to CEQA Guidelines Section 15093, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." Such an outcome would necessitate a Statement of Overriding Considerations.

Response to Comment Ind 547-2

Please see Response to Comment Ind 546-3.

Response to Comment Ind 547-3

The commenter states that the DEIR utilized Yuba City as a location for air quality data, which the commenter states is not representative of Nevada County. As stated on page 4.3-10 of the DEIR, because the Grass Valley station only monitors ozone (O3) and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project sites. The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity. Further, this information is not used to model the project's emissions, and thus, has no bearing on the findings of the analysis.

Response to Comment Ind 547-4

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 548

Martha Turner, RN, MSN, NP, CNM (Retired)
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February 28, 2022

RECEIVED
MAR 02 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA 95959

Dear Matt Kelley,

This is a written comment regarding the DEIR on the proposed Idaho-Maryland Mine Project. I will focus my comments on **Chapter 4.13 WILDFIRE**.

Ind 548-1

I am a long-time resident of Nevada County with a professional background in women's health care and birth. In my young adult years I was a seasonal firefighter on both the Tahoe National Forest and the Stanislaus National Forest. I built a house and lived in the woods outside of Nevada City for 30 years. I have always been fire aware. In 2015, just two months after moving to Middletown, California, to be with my partner, we were burned out in the Valley Fire. In the years following we have seen even bigger and more devastating wildfires in California. We moved back to Nevada County after the fire and decided to live in town and our property happens to have a fire hydrant on corner which is abstractly comforting. It is an indescribable experience to lose everything one has ever had except one car and a suitcase. But we have our lives while others have been lost.

At present I am on a team working to organize our church members into what we call "Fire Clusters" to help one another in the event of a fire and an evacuation order is received. The input from ZoneHaven, the NC Fire Safe Council and the NC Office of Emergency Services have been supportive and informative. We utilized this action plan for the Bennett Fire, the River Fire and the Jones Fire in 2021.

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I have studied Chapter 4.13, pages 1-28, and I am not reassured. I understand this DEIR was written by a reputable company with many qualified and skilled writers and there are still unanswered questions, unasked questions and, I believe, conclusions that are not supported by the information in this report. The deficiencies are listed below and "mitigations", which I believe are inadequate, and conclusions which I find to be unsupported, will be noted.

Chapter 4.13 EXISTING ENVIRONMENTAL SETTING

Page 4.13.2

The fire protection agencies are described and it is not clear what the relevancy of who is the responsible service for structural fires when the concern of this chapter of the DEIR is wildfire. Yet the community has been informed that Rise Gold has promised Ophir Hill Fire Department a new fire truck and salaries for three additional fire fighters. I find this unethical when it is not known if this company will be allowed to even build this heavy industrial complex. In fact, both the Brunswick and Centennial sites are under the responsibility of the state CAL FIRE and designates both sites as Very High Fire Hazard Severity Zones (VHFHSZ). The map of Figure 4.13-1, shows the Brunswick site contiguous with the VHFHSZ of the entire region, and the Centennial site with approximately half its borders in the VHFHS Zone.

Ind 548-2

In the discussion of **Wildland Fire Hazards** the Topography and Vegetation and Prevailing Winds is described which states the closest slopes are 3-4 miles away. In fact, the gentle hills of Grass Valley begin to climb within a mile of the Brunswick site when heading up Greenhorn Road. While the fact that fire can move up a slope more readily is accurate, wildfires burn in the direction the wind blows and by currents produced by the fire itself. The mine sites are not immune to burning as the report suggests. The references to Deer Creek Canyon and Greenhorn Creek and Steep Hollow Creek are questionable, all which are miles away and have no bearing.

Ind 548-3

The "Large Fire History" states that "relatively few larger wildfires have occurred within the region over the past three years." This is FALSE. The

2

fires were not the mammoth conflagrations on the scale of the Caldor Fire or the Mendocino Complex or the Valley Fire but, as spelled out in the DEIR on pages 4.13-3 and 4.13-4, there were 16 wild fires that burned Nevada County since 2015 with three in the last two years. What is considered "relatively few"? The Bennett Fire came near to burning our town while the River Fire and the Jones Fire burned forest and homes. The local Grass Valley evacuation experience during the Bennett Fire was severely impacted by traffic congestion. A person I know who lives in a mobile home park in the Brunswick basin was unable to get out of because of traffic congestion. She was told she could try walking out by fire officials. This problem will be seriously compounded by the movement of mine trucks hauling waste rock through the basin.

The next discussion is under the title of **Fuel Treatment Efforts**. While fuel reduction is an important remedial step to reduce fire hazards, the relatively small amount that is described within the 1.5 mile radius will have little impact if there is a fire storm and spot fires preceding the front of a fire.

Ind 548-4 The map of Figure 4.13-2 shows a large section of western Nevada County and the areas of Fuel Treatment Projects. It is evident that there is only a very small percentage of land that has been treated or is planned to be treated anywhere near the project sites. The DEIR report then goes on to say where the fuel treatment projects are, which are in fact, miles away from the project sites. What is the relevance of these fuel treatment projects to the mine properties?

Ind 548-5 **Grass Valley Air Attack Base** (one of 13 in California) is noted along with **Wildfire Dispatch** that covers 12 operational areas. What is the relevancy?

Ind 548-6 Page 4.13-13 **Nevada County Emergency Operations Plan (EOP)** is noted. However, the second paragraph addresses a Mass Evacuation Annex (Annex B), yet to be approved by the Board of Supervisors. It described a plan for disasters that have been caused by and incidents *outside of Nevada County* and how to support a mass vehicular evacuation moving within or through Nevada County. Where in EOP is the evacuation of the mine employees or truck drivers addressed? According to Rise, there will be 200-300 hundred employees of which only the underground people will be doing shift work. How many workers and vehicles and trucks will be

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evacuating along with residents at the time of a fire? This section needs critical review and reconsideration.

4.13.4 IMPACTS AND MITIGATION MEASURES

This is the heart of this chapter of the DEIR which purports to discuss the impacts of reopening of the IMM related to Wildfire and the astonishing conclusion that states ALL IMPACTS ARE LESS THAN SIGNIFICANT. The reference to both the Standard of Significance and the Method of Analysis gives the impression the analysis will be impartial and non-biased. I find this to be far from accurate regarding the following matters:

The greatest concern regarding WILDFIRE is the impact of the trucking and traffic that this heavy industrial complex would add to the evacuation of the populace in the event of a fire in the region of the mine. This concern is included as one of the three impacts that are Significant after mitigations noted elsewhere in the DEIR.

Ind 548-7

How can the statements found on 4.13-1, page 4.15-15 that state 50-100 trucks per day, carrying 20 tons of rock per truck, that will be driving on Brunswick Road, which is classified as a "Minor Arterial" road and not be considered to have an impact on an evacuation order to that area? Plus "up to 18 additional truck trips could occur per day for various operations" for five years, 16 hours a day, seven days a week. This is 118 trips per day of trucks and does not include personnel in their own vehicles. As stated in this DEIR, this will constitute approximately 7.4 haul truck round trips per hour on Brunswick Road. This is an enormous amount of additional traffic coming into the basin and intersection of Brunswick Road and State Route 20/49 where, in an evacuation situation in the area of the mine will have people in their vehicles coming from all points east of Highway 20/49 if Hwy. 174 is closed. As I stated above, this area was a serious bottle neck with the Bennett Fire last year.

Most disturbing in the extensive discussion on evacuation in the case of Wildfire and an evacuation order in the vicinity of the mine is this: " ...the incident command center would contact dispatch and direct them to contact the mine and REQUEST the mine operator to shut down the mine and cease all truck hauling operations". REQUEST? What sort of authority and

Ind 548-8

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enforcement is in the word REQUEST? Evacuations for the public are ORDERS and are enforceable. Why would we think that this giant industrial complex, whose purpose is mining 24 hours a day and making as much money as possible, will shut down if it were "requested" to shut down and not ordered to do so? An evacuation order doesn't "request" that people leave their properties but orders them to do so. They are not allowed back in until the order is lifted. What if the mine operators were to say "No, we will not shut down our mine"? Many large companies are known to pay fines for infractions of laws as part of the cost of doing business…at what cost to our community?

Ind 548-9

I cannot believe that this item is being considered to "have a less than significant impact related to substantially impairing an adopted emergency response plan or emergency evacuation plan" and no mitigation is required as stated on page 4.13-17. This must be reconsidered as it is also a complete contradiction to the "Significant and unavoidable" impact this project will have on Transportation in spite of mitigations on the Brunswick and SR20/49 intersection. This section needs careful review and reconsideration.

Ind 548-10

Chapter 4.13-2 further discusses the matter of topography and wildfire risk. The second paragraph spells out that there are four acres and seven acres that have steep slopes of 30% or greater between the two sites, yet also states these steep slopes will not have an impact on fire behavior. This is totally contradictory from the discussion of fire behavior on slopes and prevailing winds which "could burn through the Sites" of both Brunswick and Centennial sites. This matter needs careful review and reconsideration.

The report goes on to say that on the Brunswick site, 18.5 acres of the 58 acres of forest will be cut down. On the Centennial site, 6.5 acres of the 10 acres of forest will be cut down. This is called "vegetation reduction" which sounds like a clear-cut. Has the environmental impact of a 25-acre clear cut been considered?

The report goes on to reiterated the fuel treatment projects far and wide in western Nevada County, which I have already commented on as to the

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irrelevancy of these distant projects (some of which have been seeking funding for years).

Ind 548-11

Why is there an inclusion in the description, in this section of the DEIR, to install a potable water line for residents along East Bennett Road as an example of roadside fuel reduction? There is already a Right of Way on the road to install such a pipeline so what fuel reduction will be done in digging up the road? This potable water line has been proposed to be installed by N.I.D. and paid for by Rise Gold as the wells along this road are anticipated to be negatively impacted.. At the same time Rise Gold has said repeatedly that the wells in the area will not be impacted. If this is true, why is a water line needed? Why is putting a water line in being used as an example of "fuel reduction" to reduce wildfire hazard? This section needs careful review and reconsideration.

Ind 548-12

Rise Gold's Fire Protection Plan for the proposed project has both 30-foot and 100-foot defensible space zones. This seems to be adequately described and no dead trees, leaves or firewood piles will be allowed. Tiny plots of landscape greenery are shown in Figure 4.13-3 to beautify the industrial complex. Is this part of their Aesthetics mitigation? Most of Zone 2 will be asphalt so there will be no combustible materials. The building materials will be compliant with ignition-resistant materials. It seems that should a wildfire approach, the project property and buildings will be safe, unless the explosives that are being trucked in during a wildfire explode or the diesel tanks ignite.

Why does the DEIR include a "fire flow system" as support of this project having "less than significant" impacts? Then go on to state, page 4.13-20 paragraph 3, that it is not known if the old fire flow infrastructure used by the lumber mill, even meets CFC requirements? Please review this for validity.

Ind 548-13

Has a "comprehensive vegetation management plan required by the County Fire Marshall's Office been provided? If so, how will the plan be adhered to "in perpetuity" if the company goes bankrupt (which this company did on its last project in British Columbia)? If not, how can it be included in this DEIR and give support to the DEIR conclusion that this

project's impacts will be mitigated to "less than significant" regarding Wildfire impacts?

Ind 548-14 Another questionable assertion by the DEIR is that the CAL FIRE station on Ridge Road could reach a theoretical fire at the mine within the 5-minute response time goal. The DEIR acknowledges the response time is "depending on local traffic conditions". Once again, the unmitigable and significant impact of traffic at Brunswick Road and SR 20/49 comes into focus.

Ind 548-15 I am alarmed by the second paragraph on page 4/13-21 that states the transportation, storage and use of explosives will comply with Federal and State laws and states "given that storage and use of explosives would only occur underground at the Brunswick Industrial Site, an unexpected explosive event would not be likely to exacerbate above-ground wildfire risks". Does this address the matter of trucks carrying the explosives to the mine through our town or the time of transferring these explosive materials to be stored underground? What ensures these trucks will not be involved in a vehicle accident during transit between where the explosives are purchased and to the mine? The risk will be increased during the high tension of a mass vehicular evacuation. Please review the following link: https://www.nytimes.com/2022/01/20/world/africa/ghana-explosion-mining-truck.html

Ind 548-16 If I am reading the long third paragraph on page 4.13-21 correctly, we can be assured that the dewatering of the mine is at deeper levels than where the roots of the trees and plants are. This makes sense. Then details describe the depth of groundwater varies considerably depending on the topography and that there is seasonal fluctuation. This too makes sense. What is not at all clear is the assertion that the water discharged into South Fork Wolf Creek from the mine, which we have been told by Rise Gold to be over 3.6 million gallons a day for the initial six months followed by 1.2 million gallons a day for 80 years, would "prevent the lowering of the groundwater levels along the reach of that creek whereas only a small fraction of the groundwater that was removed from the subsurface would come from that area". What is this saying? Is it saying groundwater is being removed? The mine claims the dewatering will have no effect on groundwater yet this report says "only a fraction… that was removed".

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What is accurate? The report then makes a vague reference to NID's releases into Wolf Creek during the dry season. What does this have to do with the impact of dewatering of the mine and wildfire hazards? The statements add to the questionable quality of this DEIR and needs careful review.

Reclamation, page 4.13-21

Reclamation certainly is an important consideration to this mine closing before 80 years. There is notation of removal of "The tallest structures on-site" along with the covered conveyor system and the above ground 20,000-gallon diesel fuel tanks…". Why is this number not consistent with what is stated to be two 12,000 tanks on the Brunswick site and 1,200 gallon tank on the Centennial site? Who will pay for this part of the reclamation if Rise Gold goes into bankruptcy? Who will pay for the reclamation of the damage to the ground water and the ecosystems of the North Fork Wolf Creek? Who will pay for the loss of property value if the private property owners wells are dry or contaminated? The people will pay. The people of Nevada County and state of California and the people of the United States is who will pay. Bankruptcy was claimed by Rise Gold on their last project and the posted bond for clean-up is a small fraction of what is needed. The Canadian courts are still battling for financial accountability of Rise Gold.

Ind 548-17

The **Conclusion** of this section of the DEIR states the proposed project could have a significant impact related to exacerbation of wildfire risks without a vegetation management plan. A vegetation management plan would theoretically reduce the Wildfire risks. Still there is NO mention of the need to evacuate in the case of a wildfire. This is after detailed description of the 118 round trips of truck which the "Conclusion" ignores completely.

Ind 548-18

Next in the report comes the **Mitigation Measures** starting on page 4.13-22, where every impact noted in this chapter is mitigated to a "*less-than-significant level*". The report contends that a vegetation management plan and the creation of defensible space, wildfire danger becomes insignificant.

Ind 548-19

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Is this to suggest that wildfire danger becomes insignificant to property owners if they create defensible space around their homes? While this may help save their home it does not make the risk "insignificant". Homeowner's insurance has sky rocketed because of fire danger in our state and elsewhere, yet this report says wildfire danger is insignificant for the mine property simply with a vegetation management plan. Our home had well maintained defensible space and it burned to the ground in the Valley Fire.

Ind 548-20 On page 4.13-24 we are asked to have confidence that PG&E will eliminate the fire danger from the power poles and lines that will service the mine complex. Recent history tells us that regardless of what PCR 4292 and PCR 4293 says about firebreaks and tree/branch removal, fires do still start from trees and branches falling on PG&E power lines. I am not reassured and I ask that this be carefully reviewed and reconsidered.

Ind 548-21 The presence of two 12,000-gallon tanks of diesel fuel, for a total of 24,000 gallons of fuel, will be transported and stored in tanks on site. The report suggests that with the use of Chapter 23 of the CFC and Fire Marshall's inspections, there will be NO potential for fire danger and environmental catastrophe. However, human errors happen. Another tank, containing 1,200 gallon of diesel fuel will be located on the Centennial Site which is surrounded by our town.

Ind 548-22 The item 4.13-4 yet again suggests there will be "less-than-significant" impacts of post-event hazards such as flooding or landslides following the "less-than-significant" impact of a wildfire involving this project. I appreciate the discussion of the post-fire debris-flow hazard assessment of the 2017 McCourtney Fire in our community. However, as noted in this DEIR, the difference is the presence of mine tailings and the presence of North Fork Wolf Creek. Mine tailings will not allow rains to soak into the ground and the creek will be impacted by runoff. In light of the differences, how does the McCourtney Fire assessment apply to this project? Have the homes that are located along Wolf Creek, which are already prone to flooding, been considered? We have all seen those modest homes being flooded in times of high water and how will the addition of 1.2-3.6 million gallons a day

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do to the flooding when the creek rises with natural heavy rain runoff? Again, this is a matter that needs further review and analysis.

Cumulative Impacts and Mitigation Measures 4.13-5

The final page of this chapter is the ultimate statement that with the mitigations proposed by the mine owners, there will be **no significant cumulative impact** related to the exacerbation of wildfire risk. How can this be? My focused analysis of this chapter of the DEIR, along with common sense tells me otherwise. Wildfire is ALWAYS a risk to our rural county. The combination of a heavy industrial complex in a VHFHSZ, the added heavy trucking traffic on our roads, the transportation of explosives and fuel on our roads and through our communities, the storage of explosives and fuel on the site, the history of PG&E caused fires, the questionable reputation of Rise Gold, the potential of human errors and accidents, does little to reassure me that this project will not have a negative impact on life in our community in spite of the findings of this report.

Ind 548-23

I respectfully ask that all my concerns and comments be reviewed and considered by the Planning Department of Nevada County, before a recommendation is made to the Board of Supervisors.

Respectfully submitted,

Martha Turner.

Martha Turner, RN, MSN, NP, CNM (Retired)
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Grass Valley, CA 95945
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INDIVIDUAL LETTER 548: MARTHA TURNER

Response to Comment Ind 548-1
This is an introductory comment. Responses to specific comments are provided below.

Response to Comment Ind 548-2
As discussed on page 4.13-7 of the DEIR, CAL FIRE has primary responsibility for wildfire suppression on lands within SRAs, wherein the Centennial and Brunswick Industrial Sites are located. The CAL FIRE Nevada-Yuba-Placer Unit serves the project area. Notwithstanding, depending upon the incident, other fire agencies may provide response during a wildfire incident through mutual and/or automatic aid agreements. These agencies are discussed in Chapter 4.11, Public Services and Utilities, of the DEIR.

As stated in page 4.13-17 of the DEIR, with regard to the wildfire analysis, significant slopes are those in steep-walled canyons or mountainous valleys. The DEIR does not suggest the project sites are immune to wildfire and states on page 4.14-17 that that a fire burning in the forested terrain southwest of the Centennial and Brunswick Industrial Sites could burn through the Sites due to prevailing southwesterly winds. As stated on page 4.13-18 of the DEIR, CEQA Guidelines Appendix G indicates that additional factors must be considered to determine the potential for a project to exacerbate wildfire risk. Among these other factors is the extent and nature of on-site vegetation.

Response to Comment Ind 548-3
As stated on page 4.13-3, the definition of "larger wildfires" occurring within the region is according to CAL FIRE. The project truck traffic would not substantially interfere with an evacuation plan. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-4
The purpose of Section 4.13.2 of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

Response to Comment Ind 548-5
The purpose of Section 4.13.2 of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

Response to Comment Ind 548-6
The Nevada County Emergency Operations Plan does not address any specific projects. As stated on page 4.13-13 of the DEIR, the Nevada County Emergency Operation Plan (EOP) delineates responsibilities of first responders (fire and law) and other response support organizations, e.g., Department of Public Works, Environmental Health, etc. for natural disasters and manmade emergency incidents in Nevada County. The EOP is intended to mitigate future disasters and emergency incidents. Project traffic would not substantially interfere with an evacuation plan. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-7
Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-8
Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-9

Please see Master Response 5 - Evacuation Zones. For clarification purposes, as demonstrated in Chapter 4.12 of the DEIR, the project would not have any significant and unavoidable impacts to intersections near the SR20/49 intersection.

Response to Comment Ind 548-10

The DEIR does not state that the on-site slopes over 30% will not have an impact on fire behavior, but rather the amount of 30% slopes is not a substantial factor in influencing on-site fire behavior, as would be the case for the more fire risk topographical areas in the region, such as Deer Creek canyon and Greenhorn Creek canyon. Whereas the project site has some limited steep slopes, these other areas in the region are marked by *both* topographic characteristics (i.e., steep slopes) and topographic features contributing to fire risk (e.g., canyons, ridges, chutes and saddles).[1] The impact to vegetation communities, including those mentioned by the commenter (e.g., on-site tree removal), is analyzed in Chapter 4.4 of the DEIR.

Response to Comment Ind 548-11

The project does not propose to conduct fuel treatment along E. Bennett Road. As stated on page 4.13-5 of the DEIR, with respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site.

As stated on page 4.8-66 of the DEIR, the proposed mining operations could result in adverse effects to seven domestic water supply wells in the East Bennett area during the life of the mining operation. After reclamation, when the mine is allowed to flood, groundwater levels in the wells would recover to their approximate pre-project levels. As discussed in the Project Description chapter, pursuant to Nevada County General Plan Policy 17.12, the project would address this by installing a potable water supply line in East Bennett Road and providing individual well owners with a connection to the potable water line. While only seven wells are projected to be adversely affected, the applicant has prepared a Well Mitigation Plan (February 2, 2021) that would connect up to 30 properties in the East Bennett area to the NID potable water system.

Response to Comment Ind 548-12

The landscaping shown in Figure 4.13-3 is part of the planned landscaping as further described in Chapter 4.1 of the DEIR. The fire flow system is not constructed yet. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The installation of the fire flow system for the project would be required to meet California Fire Code (CFC) requirements.

Response to Comment Ind 548-13

A Vegetation Management Plan is not required to be submitted until improvement plans, such as grading or building permit applications are submitted. Mitigation Measure 4.13-2 requires that in conjunction with submittal of Improvement Plans, the applicant shall submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The mitigation measure is legally adequate pursuant to CEQA in that it has sufficient performance standards to ensure that the

[1] E.g., see https://www.nwcg.gov/sites/default/files/training/docs/s-190-ig04.pdf.

future management plan will reduce the potential wildfire impact to a less-than-significant level. As stated in CEQA Guidelines, Section 15126.4(a)(1)(B):

> The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure.

The applicant shall implement all provisions of the Vegetation Management Plan during the project's construction, operations, and reclamation activities.

Please also see Master Response 3 - Operator Responsibility.

Response to Comment Ind 548-14

The commenter appears to question information obtained from the County's personal communication with local fire agencies. As stated in the DEIR, depending on local traffic conditions, a wildland engine from Station 20 could potentially reach the Centennial and/or Brunswick sites within 5 minutes. This would assume the most direct route using Old Tunnel Road to Brunswick Road. The project does not have a significant and unavoidable traffic impact to any roadways or intersections on Brunswick Road and Highway 20/49. Please see Chapter 4.12 of the DEIR and Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-15

The transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries. Please also see Master Response 10 - Explosives, Reagents, and Brunswick Fill, and Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-16

Please see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 548-17

No reference to 20,000-gallon tanks is made on page 4.13-32 of the DEIR. As stated on page 2-3 of the DEIR, a Reclamation Plan and Financial Assurance Cost Estimate (FACE) will be required for the project. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. The Reclamation Plan is provided in Appendix C of the DEIR.

The mine water discharge would have a less than significant impact after mitigation on the ecosystem of South Fork Wolf Creek. Please see Chapters 4.4 and 4.8 of the DEIR, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek.

The project would have a less than significant impact after mitigation to domestic water wells. Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

With regard to property values, please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Please also see Master Response 3 - Operator Responsibility.

Response to Comment Ind 548-18

Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 548-19

As stated on page 4.13-2, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Mitigation Measure 4.13-2 of the DEIR mitigates this risk.

Response to Comment Ind 548-20

The commenter asserts that the project could result in wildfire impacts due to branches falling on PG&E infrastructure and PG&E's failure to follow legal requirements for firebreaks and tree/branch removal. PG&E infrastructure exists throughout the County regardless of the project. Nonetheless, wildfire risk due to the placement of limited power conveyance lines on the project sites and PG&E's failure to follow legal requirements for firebreaks and tree/branch removal is speculative. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 548-21

Page 3.13-24 of the DEIR states the project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site. The tanks would be located in the industrial building complex area, away from existing and proposed vegetation. Diesel fuel is considered a Class II liquid, and as such, the tanks would be regulated in accordance with Chapter 23 of the CFC. Chapter 23 of the CFC includes robust design requirements for above-ground fuel storage tanks to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. Compliance with CFC requirements, as determined by the Fire Marshall's Office, at time of improvement plan review, would reduce fire hazards related to on-site fuel storage tanks. The proposed 1,200-gallon temporary diesel fuel tank at the Centennial Industrial Site would also

comply with CFC standards related to siting and maintenance of clearance space (i.e., removal of grass and weeds).

Response to Comment Ind 548-22

As stated on page 4.13-26 of the DEIR, although runoff from both Sites flows into creeks, the project includes drainage facilities to capture runoff prior to entering the creeks. Should a fire occur on one or both of the project sites, the proposed drainage facilities would capture and slow post-fire runoff, thus minimizing flooding potential downstream. As stated on page 4.8-70 of the DEIR, the proposed detention basins would hold back the peak flows and release the water at a lower rate and at a later time than currently occurs from those site areas. As a result, the project would reduce peak storm flows in both Wolf Creek and South Fork Wolf Creek.

Response to Comment Ind 548-23

This comment is a summary of the commenter's previous statements. Responses to specific comments are provided above in Responses to Comments Ind 548-1 through Ind 548-22.

Individual Letter 549

Pg 1

Spoken Comment for Planning Commission Special Meeting March 24, 2022

My name is Martha Turner and I live at 10860 Dolores Drive, Grass Valley, Supervisor District 3. I am a retired Nurse Practitioner and Nurse Midwife, I am not, as Don Rogers referred to, a "busybody", and have mostly lived in Nevada County since 1960. I was a Forest Service firefighter as a young adult and in 2015 we lost our home to a WILDFIRE, which makes this subject near to my heart.

Ind 549-1

My DEIR comment today is on Chapter 4.13 titled WILDFIRE and request that the following matters be further reviewed by the Planning Commissioners before a recommendation is made to the Board of Supervisors. I was NOT reassured by what I learned.

- The report suggests the mine site will be immune to the danger of a wildfire. Yet, there is forest on both sites.
- The report minimizes the risk of fire in our region. In fact, there have been 16 wild fires that burned in Nevada County since 2015.

Ind 549-2

- The report does NOT adequately address how the mass evacuation of residents, along with an additional 312 mine employees, will be handled.

Ind 549-3

- Quite disturbing is the statement, that in the event of a wildfire, fire officials would "REQUEST" the mine to shut down. What sort of authority and enforcement is in the word REQUEST?

Ind 549-4

- While truck traffic is recognized elsewhere in the DEIR as "Significant", this part of the DEIR states the impact of truck traffic is "Less than Significant" in the event of a wildfire. This makes no sense.

Ind 549-5

- There is no discussion in relation to WILDFIRE about the trucks carrying explosives through town or the transferring of these explosive materials before they are stored underground.

Ind 549-6

- The report contends that with a "vegetation management plan" wildfire danger becomes "Insignificant". Our home had a well-maintained defensible space and still burned to the ground.

Ind 549-7

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MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

pg 2

Ind 549-8

- The report states that the presence 24,000-gallons of diesel fuel on site will have NO potential for fire danger and environmental catastrophe. NO POTENTIAL?

Ind 549-9

- It is also stated there will be a "less-than-significant" risk of flooding, even though it acknowledges mine tailings DO increase water runoff. What happens to the homes located on Mill Street along Wolf Creek? We have all seen those back yards being flooded when the creek rises. There is no consideration of the impact of an additional 1.2-3.6 million gallons of water a day going into the creek and added to heavy rain fall.

Ind 549-10

The final page of this chapter is the statement that this mine will cause **no significant cumulative impact** related to wildfire risk. My focused analysis of this chapter, along with common sense, tells me otherwise.

Thank you very much for hearing my comment.

Martha Turner Martha Turner
10860 Dolores Drive
Grass Valley, CA 95945
530.632.3187
turnermartha19@gmail.com

INDIVIDUAL LETTER 549: MARTHA TURNER

Response to Comment Ind 549-1
The comment expresses a general opinion that the discussions and analyses in Chapter 4.13, Wildlife, of the DEIR are inadequate, but does not provide specific examples that would allow for a detailed response. Such examples are provided in subsequent comments.

Response to Comment Ind 549-2
The DEIR does not state the project is immune to wildfire danger. Chapter 4.13 of the DEIR assesses the project's impacts related to Wildfire. Page 4.13-22 of the DEIR states, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan (VMP), the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Mitigation Measure 4.13-2 requires implementation of a VMP on an ongoing basis.

Please see Response to Comment Ind 548-3.

Response to Comment Ind 549-3
Please see Responses to Comments Ind 548-6 and 548-7.

Response to Comment Ind 549-4
Please see Response to Comment Ind 548-8.

Response to Comment Ind 549-5
Please see Responses to Comments Ind 548-6 and 548-7.

Response to Comment Ind 549-6
Please see Response to Comment Ind 548-15.

Response to Comment Ind 549-7
Please see Response to Comment Ind 548-19.

Response to Comment Ind 549-8
Please see Response to Comment Ind 548-21.

Response to Comment Ind 549-9
Please see Response to Comment Ind 548-22.

Response to Comment Ind 549-10

Please see Response to Comment Ind 548-23.

Individual Letter 550

Dist 1

RECEIVED
MAR 0 3 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Ave. Suite 200
Nevada City, CA. 95959

Dear Supervisors,

Ind 550-1 I live on Greenhorn Road, close to the site of the proposed reopening of the Idaho-Maryland mine. I've been following closely what opening this mine is likely to do to our community. I've read the summary DEIR and followed the letters and commentary written by many informed residents. My concerns have NOT been mitigated.

Ind 550-2 First of all, switching 31 residents from wells to NID is a laughable solution to the risks of the mine using millions and millions of gallons of water. This water is a public resource, not for the use of one company - a foreign company - to make a profit. We are currently in the worst drought in 1200 years and absolutely no one is suggesting that this will end soon. Given climate change it is more likely to worsen over time. Giving this resource away prioritizes a foreign company's profit over the well being of local residents.

Ind 550-3 I have many, many more concerns. Air and water pollution, noise, traffic, a degradation of local aesthetics. I found the mitigation proposals in the DEIR to be weak and unconvincing. But even more concerning is the past record of Rise Gold. They violated multiple environmental and safety

Ind 550-4 standards in their last project, claimed bankruptcy and walked away leaving polluted waters and hundreds of thousands of dollars in costs to the community. Rise Gold has shown us who they are. Shame on us if we ignore that.

Ind 550-5 Yes, we need jobs in Nevada County. Filling in gaps in broadband, expanding infrastructure in our current industrial areas are potential starts. Let's look to a sustainable future, not our polluting mining past.

Thank you,
Marv Hoffman

INDIVIDUAL LETTER 550: MARV HOFFMAN

Response to Comment Ind 550-1
The commenter expresses general project-related concerns. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 550-2
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 550-3
Please see the discussions and analyses in Chapter 4.1, Aesthetics, of the DEIR.

In addition, the commenter expresses a general opinion that the mitigation measures set forth in the DEIR are "weak and unconvincing," but does not provide specific examples that would allow for a detailed response. Please see Master Response 1.

Response to Comment Ind 550-4
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 550-5
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 551

Matt Kelley
Nevada County Planning Commission
950 Maidu Ave. St. 170
Nevada City, Ca. 95959



Dear Mr. Kelley,

Ind 551-1 I have read the summary of the DEIR for the proposed opening of the Idaho-Maryland mine. I have also been paying close attention to the opinions of many qualified and informed members of our community. It is obvious that there would be many serious impacts if the mine were to reopen.

Ind 551-2 I'm very concerned about aesthetics, noise, traffic and potential pollution of our air and water. But my primary concern is the amount of water that the mine will use. We are currently in the worst drought of 1200 years. No one seems to think that this drought will be over soon, or if climate change will worsen the drought and make it permanent. Allocating massive amounts of water to a foreign company so that they can make a profit is likely to be at the cost of local residents. I live on Greenhorn Road and fear for my well. Transferring 31 homeowners from wells to NID will not solve this problem. These risks are real and cannot be mitigated.

Ind 551-3 Though water is my primary concern I am also worried that the proposals for other mitigations are weak and that enforcement is vague. We are dealing with a company that went bankrupt on it's previous project and left the community with the costs. They were charged with many violations of environmental and safety standards. Why would we believe that this project will be any different? How can you mitigate risks with a company whose own track record shows that they are not trustworthy?

Thank you for hearing my concerns.
Marv Hoffman

INDIVIDUAL LETTER 551: MARV HOFFMAN

Response to Comment Ind 551-1

The comment does not address the adequacy of the DEIR, but expresses general concerns related to the project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 551-2

The commenter expresses general concerns regarding aesthetics, noise, traffic, air and water pollution, and groundwater impacts. These topics are addressed in detail throughout the DEIR - please see Master Responses 1. Regarding well impact and climate change concerns, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 551-3

The comment expresses a general opinion that the mitigation measures set forth in the DEIR are "weak and that enforcement is vague," but does not provide specific examples that would allow for a detailed response.

Please also see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 552

Matt Kelley
Nevada County Planning Commission
950 Maidu Ave. St. 170
Nevada City, Ca. 95959



Dear Mr. Kelley,

Ind 552-1 I have read the summary of the DEIR for the proposed opening of the Idaho-Maryland mine. I have also been paying close attention to the opinions of many qualified and informed members of our community. It is obvious that there would be many serious impacts if the mine were to reopen.

Ind 552-2 I'm very concerned about aesthetics, noise, traffic and potential pollution of our air and water. But my primary concern is the amount of water that the mine will use. We are currently in the worst drought of 1200 years. No one seems to think that this drought will be over soon, or if climate change will worsen the drought and make it permanent. Allocating massive amounts of water to a foreign company so that they can make a profit is likely to be at the cost of local residents. I live on Greenhorn Road and fear for my well. Transferring 31 homeowners from wells to NID will not solve this problem. These risks are real and cannot be mitigated.

Ind 552-3 Though water is my primary concern I am also worried that the proposals for other mitigations are weak and that enforcement is vague. We are dealing with a company that went bankrupt on it's previous project and left the community with the costs. They were charged with many violations of environmental and safety standards. Why would we believe that this project will be any different? How can you mitigate risks with a company whose own track record shows that they are not trustworthy?

Thank you for hearing my concerns.
Marv Hoffman

INDIVIDUAL LETTER 552: MARV HOFFMAN

Response to Comment Ind 552-1
Please see Response to Comment Ind 551-1.

Response to Comment Ind 552-2
Please see Response to Comment Ind 551-2.

Response to Comment Ind 552-3
Please see Response to Comment Ind 551-3.

Individual Letter 553

From: Mary Anderson <andersonmaryf@hotmail.com>
Sent: Monday, April 4, 2022 4:08 PM
To: Idaho MMEIR
Subject: Rise Gold Proposal

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Matt Kelley
Planning Commission
Nevada County

Mr. Kelley,

I live off of Beaver Drive and share a property line with the Brunswick mine site. I have lived here for thirty years and this is the third time we have been faced with the possibility of reopening the mine. I am completely opposed to this proposal and feel that any benefit to the community is far outweighed by the risks involved. I believe the DEIR mitigation measures to be inadequate in addressing my concerns—mainly water, air and noise pollution, and truck traffic.

Ind 553-1

1) The hydrology report does not address the possibility of water loss to private wells in the area other than the thirty wells on East Bennett. Ten plus years ago when Emgold was applying to reopen the mine, I believe our wells were designated as being at risk. Why are they no longer at risk? Also, there is no assurance that we would be supplied water by NID in the event that this happens—no bond in place to cover the cost and no guarantee that NID would even have enough water supply to provide for us. When we are in a wildfire area and a period of significant drought, does it really make sense to pump millions of gallons from the mine, allowing more water to flow into it, thus reducing the amount of groundwater available to all of us? I think not.

Ind 553-2

2) I believe air pollution is a significant risk to the health of our community that cannot be adequately mitigated. What is less than significant to one person can be quite significant to another. Contaminants from asbestos, silica, and diesel emissions produced by mining activity can become airborn and as such would likely contribute to serious illness like lung cancer, asthma, and other acute or long term disease. The air quality in Nevada County already receives a poor rating. Does it really make sense to make that rating even worse? I think not.

Ind 553-3

3) Noise from blasting, rock grinding and dumping into steel truck beds to be hauled away, even the constant back-up beeping from the trucks—all to be occurring 24/7–will not likely be mitigated to a less than significant level. And again, less than significant differs from one person to another. What is "less than significant" anyway? It is definitely not "insignificant".

Ind 553-4

4) As far as traffic, it's not just about the number of trucks on the road at any given time. It includes traffic congestion at the Loma Rica/Brunswick signal at peak times with workers entering and exiting the Loma Rica Business Park area—with trucks traveling at slower speeds on the uphill grade in that area. It includes wear and tear on the roads, diesel

1

truck exhaust fumes, and noise from those trucks all 16 hours/day (6 a.m. to 10 p.m.) 7 days per week! I don't think all this can be adequately mitigated.

Ind 553-5

As I stated earlier, these are just some of the concerns I have about moving forward with this project. Others have addressed significant and valid concerns regarding environmental issues, aesthetics, electrical energy consumption, greenhouse gas emissions, and monitoring and enforcement of regulations. I urge you to give serious consideration to all of these concerns when weighing your decision. We are a vibrant community, we love this area, and we are deserving of that consideration.

Sincerely,
Mary Anderson

Sent from my iPad

2

INDIVIDUAL LETTER 553: MARY ANDERSON

Response to Comment Ind 553-1

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter also states that the DEIR does not discuss the potential impact to groundwater wells outside of the East Bennet Road private wells.

The DEIR and previous hydrogeologic assessments consider the groundwater wells in the Beaver Drive area to "low risk." The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments. The DEIR's current assessment and analysis of domestic water wells for the Beaver Drive area is provided in Chapter 4.8 and Appendix K.2 (Groundwater Hydrology and Water Quality Analysis.) As shown in Table 4.2 of Appendix K.2, project drawdowns in the Beaver Drive area are projected to be minimal, ranging up to 3 feet or 4.3% of the well water column. Groundwater monitoring and well mitigation, if necessary, is required for the project. (see DEIR, Appendix K.8, Idaho-Maryland Mine Groundwater Monitoring Plan.) Groundwater monitoring is designed to provide sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The DEIR discusses the dewatering effect on soil moisture and vegetation as it pertains to wildfire risk on page 4.13-21. The DEIR states that groundwater typically exists below the rooted vegetation and tap roots for trees and thus would not impact vegetation and increase fire risk. (DEIR, p. 4.13-21.) The commenter is also referred to Master Response 33 – Groundwater Dependent Vegetation and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 553-2

The commenter is concerned with impacts to air quality and states that what is "less to significant" can vary throughout the population but does not identify why the DEIR is inadequate. The DEIR's Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) examines air pollution including asbestos, silica, and diesel emissions. The commenter is referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 553-3

The commenter states that noise from blasting, grinding (mineral processing), and noise from loading trucks is not likely mitigable to a less than significant impact but does not state by the DEIR is inadequate. In assessing the impacts from blasting, the DEIR utilizes data from a long-term blasting noise level survey from the Sutter Gold Mine in Amador County, CA from 2013. (DEIR, p. 4.10-44.) Based on that data, the DEIR concludes that any blasting-related noises would fall below the applicable daytime, evening, and nighttime criteria. (DEIR, p. 4.10-44–45.) The DEIR states that the noise impacts associated with mineral processing would be less than significant. (see DEIR, p. 4.10-37–38; Table 410-17.) The DEIR states that the dumping of rock or sand tailings into truck beds would take place in three locations. Barren rock is loaded into trucks inside a building at the Brunswick shaft by a conveyor (DEIR, Appendix L, p. 35.) and sand tailings are loaded into trucks inside the process building (DEIR, Appendix L, p. 35.) The

placement of these loading points inside buildings allows for reduction of noise from these sources. Sand tailings are loaded into trucks outside of the process plant, but only from 7:00AM to 7:00PM, as shown in Table 3-7 of the DEIR and discussed on page 36 of Appendix L. Noise generated from proposed operations (excluding temporary construction of the water pipeline) has been found to be less than significant after mitigation. Mitigation Measure 4.10-3 of the DEIR requires a comprehensive noise monitoring program and requires all on-site mobile equipment to be fitted with broad-band "growler" type back-up warning devices rather than conventional "beeper "devices.

Response to Comment Ind 553-4

Existing traffic and road maintenance are analyzed in the DEIR. Please see Chapter 4.12 of the DEIR. The Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

Air quality impacts, including diesel truck exhaust fumes are analyzed in the DEIR. Please see Chapter 4.3 of the DEIR. As stated in the Health Risk Assessment (HRA) performed for the project (see Appendix B of Appendix E.1 to the DEIR), for diesel haul trucks, estimated maximum daily trips were multiplied by 365 days to estimate annual trips. For all other trucks, daily emissions were estimated based on the anticipated maximum daily truck trips, and annual emissions were estimated based on anticipated average trips per week multiplied by 52 weeks per year. Total truck trips assumptions for the HRA are shown in HRA Table 7. Based on the HRA, which includes all construction and operational TAC sources of the project, the health risk to the maximally exposed individual resident (MEIR) would be less than significant after implementation of mitigation.

Noise impacts, including from on-road trucks, are analyzed in the DEIR. Please see Chapter 4.10 of the DEIR.

Response to Comment Ind 553-5

The commenter summarizes various concerns regarding environmental issues all of which are analyzed in the DEIR. Regarding aesthetics concerns, please see Chapter 4.1 of the DEIR. Regarding electrical energy concerns, please see Master Response 25 – Nevada County Energy Action Plan, and Response to Comment Agcy 8-17. Regarding greenhouse gas emissions, please see Master Response 27 – Greenhouse Gas Emissions.

Individual Letter 554

Matt Kelley – Senior Planner 04/01/2022

Nevada County Planning Department

950 Maidu Avenue

Nevada City, CA 95959

To Whom it May Concern,

Ind 554-1 My name is Mary Bennett and I own the home located at 13376 Noel Lane, Grass Valley. My home is less than a mile from the proposed mine site off Brunswick and Bennett Street.

I strongly oppose Rise Mine operation. Having a Foreign operator who has little to no experience running a mine operation is not in anyone's best Interest. I firmly believe after seeing all the toxic problems that revolve around mining operation from former years still waiting on Clean Up that the Board would have the best interest in the surrounding Residental community vs some Corporation rounding up investors to move forward.

Ind 554-2 Rise has "NO VIABLE Interest in the Community", where as most land and Homeowners do. I also find the need greater for housing or open space for the community to utilize rather than trucks running 24/7 on several busy streets.

The County just approved a large housing development on Brunswick do you think that a having a mining up the street will be a selling point? I would think not. There are better options than mining to move this country forward. Look to the Future and not the past.

Sincerely

Ind 554-3

Mary and Stan Bennett

13376 Noel Lane, Grass Valley, CA

(530) 477-9363

INDIVIDUAL LETTER 554: MARY AND STAN BENNETT

Response to Comment Ind 554-1

The comment does not address the adequacy of the DEIR, but rather expresses general concern regarding the project. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 554-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

Response to Comment Ind 554-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 555

Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959

April 2, 2022

Nevada County Board of Supervisors and Planning Department

I am writing because I have major concerns about the safety of reopening of the Idaho-Maryland Mine. Many of the concerns I have are not addressed in the DEIR or are not comprehensive in addressing them. Well Mitigation Plan is not adequate.

Ind 555-1

I am a homeowner who lives in the mineral boundary. I'm very concerned that the mine will change the flow of ground area through the watershed and my well will be contaminated, have less production or go dry. Because of this, last summer I had a 2600-gallon water storage tank connected to my well. If the water does fail or becomes less productive, I'd have a way to purchase and store potable water immediately. An event and an expense (about $6000) I don't think I should have had to plan for just in case the mine blasting, tunneling and dewatering removes available ground water or changes where it flows underground.

My background is teaching, science related topics mostly. I have taught 4th grade, middle school science, high school sciences including biology, earth science and environmental science. With this basic core knowledge, the reopening of the mine is something I think would be very harmful to the environment and to the citizens of the county. I completely support the DEIR conclusion that the Environmentally Superior Alternative is **"No project (No Build) Alternative would be considered the environmental superior alternative."** (Section 2.4 page 2-7)

Ind 555-2

If your decision is "to proceed with a project that would have significant unavoidable impacts... the decision to balance the benefits of the project against unavoidable environmental impacts must be adopted." (Section 2.4 page 2-4 page pdf 55) DEIR section 4.0.4 (Introduction to Analysis) defines "significant effect is defined as a substantial or potentially substantial adverse change in the environment." At best Table 2-1 (pdf pages 134-135) says: "If significant impact is found in any well" for example 10% reduction in the East Bennett group of home wells; then Rise would provide potable water. Nowhere else in the water section does it say what would happen if another significant effect was to develop on the Brunswick/Centennial Drive sites or the bigger 2585-acre mineral boundary area or the larger area that surrounds the mine workings above and below the ground. I couldn't find any criteria for stopping the mine temporarily or permanently dependent on the severity of the effect and its short- and long-term impacts. Why isn't this criteria part of the document?

Ind 555-3

Some of the concerns about water and hydrology include (section 1.8 Comments PDF page 44):

- Damage to aquifer and watershed
- Lowering of ground water table (*impacting wells*)
- Decrease in water quality
- Blasting damage causing draining of surface water and ground water
- Fire Protection
- Impact of climate change

Ind 555-4

The agricultural and Forestry resources (1.8 pdf page 40) raise concerns about the forest health from reduced ground water and pest infestation to the stress.

Ind 555-5

Nevada County General Plan Policy 17.24 (pdf page 552) says subsurface mining can be conditionally permitted with CEQA passage. The CEQA classifies these significant impacts involving water:

- Violates water standards or waste discharge
- Decreases ground water supplies or interferes substantially with ground water recharge
- Substantially alter existing drainage patterns of the site.

All of these are important concerns for me but the area of possible impact in the DEIR are too narrow in their focus. The scope of the DEIR concerns addressed is the least/minimal amount that Rise chose to consider and not deal with **all** the possible impacts that re-opening might incur.

Ind 555-6

First, I want to focus on the word "site" regarding the possible water impacts. The county policy 17.24 states "subsurface mining shall be conditionally permitted … only after impacts on the environment and affected surface land uses have been adequately reviewed and found to be in compliance with CEQA. Of particular importance shall be the impact of operation on surface land uses, water quantity and quality, noise and vibration, land subsidence and traffic associated with surface access. All other related impacts shall also be addressed." I understand "the environment" is the entire mine site where the business is located and involved in above and below the surface. In the DEIR, Rise continually limits the "site" to the area on Brunswick where the shaft is, holding ponds, business offices and processing buildings are proposed to be built above ground. The RISE use of the word "site" also includes the Centennial Road "site" where waste will be dumped. But what the DEIR ignores is the rest of the "site". Why doesn't the "site" include at the least all the 2585 acres contained in the mineral boundary? Why aren't the areas the ground water flows downward prior to being pumped out with dewatering the mine shaft and tunnels included? Why isn't the watershed(s) from the recharge areas higher in the smaller watersheds that contribute to the groundwater in the 2585 acre mineral boundary included? Why isn't the entire "environment and affected surface land uses") included in monitoring and evaluation and mitigated solutions if needed?

Ind 555-7

Section 4.8.1 proposes quarterly Rise-generated reports to monitor the significant water related issues. The monitoring will be in a few wells installed in locations of their choice. Where in the DEIR is a list or label map of the wells that are to be monitored? Figure 4.8-4 Map of Domestic Supply Wells and Underground Mine Workings (page 4.8-9 pdf page 632) indicates the wells that have been identified using the State Database and Emgold identification, some which have pump test data. These wells are in the Brunswick and Centennial site, in the mineral boundary and beyond. Peer reviewers found that 15 monitoring wells would be "adequate" to observe for 1 year prior to de-watering (page 4.8-41). That may be considered adequate by Rise's standards to **minimally** assess but it doesn't address what is happening in the entire mineral boundary area and adjacent properties. **Why aren't numerous monitoring wells located throughout the entire mineral boundary site? Why aren't all domestic wells monitored with real time gaging equipment and regular water quality sampling, not just the ones on or near East Bennett?** I can imagine that my well begins to be less productive and quicky goes dry after dewatering and mining has begun. I report it and the response will be – "How do you know its mining related?" How do I prove it? How do other domestic well owners prove related damages unless the wells are monitored with real time gaging equipment that is interpreted by experts. Would Rise hire

truly independent experts in this area to install the equipment, monitor it and draw conclusions from it? If the County is responsible – where will money for salaries and equipment come from? Surely not out of the current budget, these expenses are over and above the general needs covered in budget. It would make sense that monitoring **all** wells in the mineral boundary is necessary for a year plus for baseline measurements and then regularly during construction and initial and continuing dewatering begins. The needed monitors and expert personnel would be employed by the county, but salary costs paid by Rise.

Ind 555-8

If the well production is slowed or stopped or the water quality degraded, who will pay for alternative sources of potable water? Rise is installing NID lines for potable water or digging deeper wells for about 30 houses only located on or near East Bennett. (Table 2-1, 4.8-2, page 2-82 pdf page 132) Water use of 400 gallons per average day is paid for by RISE until they are annexed into the city or other termination clauses take effect. Then the cost of the water is the responsibility of the home or business owner, water that was once available on the property at no cost other than well maintenance. But I don't live on East Bennet or the adjacent streets or in an area that already has NID water. I was so concerned and worried that I withdrew funds from my retirement and installed a 2600-gallon water storage tank connected to my well. Should I lose the use of my domestic well, I have a place to store purchased water and it is connected to the pipes to the house. Some of my neighbors could install one should their water source be lost but others couldn't afford the cost. In my part of the county, NID is not available, and it is my understanding that there isn't enough future water available to connect beyond the first mile of Greenhorn that is already connected. Why wouldn't Rise treat all landowners with wells the same as the homeowners in the East Bennett cluster should there be a change in the production and quality of the domestic wells? Will Rise be required to set aside enough money prior to begin the project in case there is an issue with any well related to the mining in the mineral boundary zone at a minimum? (Money to monitor all wells and money to supply a comparable supply of water that their expense)

Ind 555-9

I have spent some time researching how ground water enters recharge areas and flows underground until it eventually is pumped out from a well or surfaces in a spring, creek or lake. The IMWA proceedings report: Underground mining Drainage, State of the Art, (1998, www.IMWA.info) states "Underground mining may provoke changes on in-situ permeability and on underground and sink holes, inside the angle of draw, causes the increasing of amount of water inundation and the possibility of mine water and mud invasion". These are negative impacts that affect the internal mine workings but also the ground and groundwater in the surrounding area.

Ind 555-10

Much of the focus in the DEIR's hydrology section is on specifically named areas in larger survey type reports such as the Basin Plan for the Sacramento River and San Joaquin River Basins. (4.8-13 pdf 654) The Rise DEIR points out that Wolf Creek and its tributaries is not specifically mentioned in this report. But it does include the Bear River. Yet the Bear River system includes the Wolf Creek Watershed as a source of some of its water. Why does specifically identifying areas like surrounding watersheds make them valuable and worthy of water quality objectives, recreation uses and habitat while not naming them makes them unimportant and not useful? The Basin plan calls for looking at 1) water's beneficial uses 2) water quality objectives 3) prohibitions and policy issues 4) monitoring. These objectives should be part of any review regardless of size or naming of the watershed system.

Addressing the concern of

- Damage to aquifer and watershed
- Lowering of ground water table (*impacting wells*)

I was surprised to find the DEIR mostly only examined water issues that were "downhill" from the Brunswick site and not the entire watershed (s). My understanding is that rain and snowmelt are the primary sources of groundwater in the area. Water enters the ground in various recharge areas higher in elevation, soak into the ground and water fills the pores (empty spaces) between soil particles, sands, rocks. The water percolates downward due to gravity and moves laterally down a slope. The water movement may be impacted by less permeable rocks and soils with no to very small pore spaces. The ground water may flow easily if the soil is considered loam or the sub surfaces are highly fractured rock.

This area is a result of former metamorphic processes. The Sierra Nevada mountains and foothills formed as 2 tectonics plates pushed against each other 100 million years ago. Granite and basalt deposits rose through the crust and cooled underground as huge batholiths. As tectonic forces continued, in time the pressure cracked the rocks and quartz and then gold filled some of the cracks before cooling. Not only did dikes of intrusive rock form the gold/quartz veins but also probably other magma-based molten rocks created dikes that also direct the way water flows underground. The tectonic forces cracked and faulted rocks. Layers were probably folded and re-arranged. How the intrusions, faults and fracturing of subsurface igneous and metamorphic layers make predicting how ground water flows unknowable. Section page 4.6-1 (pdf page 530-1) of the DEIR describes the regional geography as an "assemblage of igneous and metamorphic rocks" and "characterized by the N-NW trending Foothills fault system". Yet most the assumptions that Rise uses in its discussion assume the underground strata is mostly homogeneous. That is an unproven assumption. The DEIR should re-assess that assumption with on-site research and not make comparisons to other regions as their model for what the underground formations look and act like in relation to ground water.

DEIR states "According to this geologic map, four *rock units* are mapped as underlying the Site. The eastern portion of the Site is mapped as early Mesozoic Lake Combie metavolcanic rock; the northern and western sloping flanks are mapped as early Mesozoic Lake Combie massive diabase; the lower valley portions encompassing the South Fork of Wolf Creek are mapped as Quaternary Alluvium (i.e., water lain sediments); and tertiary clastic strata of the volcanic Mehrten formation is mapped in the south and southwestern portions of the Site." What about the rest of the mineral boundary site? Having identified the basic types of rocks- volcanic, basaltic (diabase), gravels and sands (alluvium) what does it say about their arrangement underground? I would expect groundwater to easily flow through the alluvium. groundwater would be blocked by the diabase unless it is fractured by the tectonic compression forces, volcanic clastic strata may be from lava flows (? maybe Banner Lava Cap) or lava thrown from the volcanic activity high in the Sierras in the Miocene. Are these layers neat flat strata like you would see in Highway cuts in the Midwest? Highly unlikely based on what can be seen after hydraulic mining stopped eroding away huge hill sides. We don't know just how these are all arranged, where all the faults are found although one is suspected in the Brunswick site. We don't know how far ground water percolates down and how fast or slow it moves laterally down from recharge zones. We don't know if there are contained aquifers, perched water. Where does the underground water actually flow? Considering the loss of wells in North San Juan's recent gold mining experience, the drilling unexpectedly hit a fault and caused the water to flow differently ruining wells. These dry and/or contaminated wells were a mile from the site. Are we willing to take the chance? I am not, my neighbors and I depend on the water in the ground and from our wells. The loss of water/ damage to



wells/ and shift in how the water flows underground probably won't be exclusive to the Brunswick site. The change in water flow could affect portions of the 2585 acres in the mineral boundary. What happens if the ground water in the areas surrounded by the mineral boundary but not owned by RISE is negatively impacted? What happens if the impact is outside the mineral boundaries? Are these businesses and property owners just out of luck?

IMWA article stated, "Often the wells drainage provokes a significant drawdown of the water table over large areas, producing significant changes on the natural hydrologic balance that can oblige to modify the land usage" (Underground Mining Drainage, State of the Art. IMWA Proceedings, p. 96). Dewatering the mine, draining the water level from 260' bgs to 3200'bgs is the same as "wells drainage" and will act in the same way as the described.

I imagine that the top of the water "table" in the 2585-acre site is mostly slanting downward as water enters higher up in the watershed and due to hydraulic pressure (percolates) and gravity moves through pores, along faults and moves generally from high to lower levels. It's an *equilibrium* as a certain amount of water soaks in from the melting snowpack and it percolates down though the soils and underground matrix and eventually enters streams and springs coming to the surface in a similar amount (with seasonal fluctuations). In 2018 EMKO observed seepage into the New Brunswick shaft (pdf page 642) and it ***assumes*** seepage in is equal to the amount leaving the drains. But is this balance going to continue once the tunnels and shaft are emptied as projected for the maintenance dewatering for the life of the mine? On page 4.3-103 (pdf 395) the DEIR states: "*Ground water continually flows into the underground mine. If the water is not pumped out, the water would very quickly flood the lowest tunnels.*" The snowpack will continue to melt and drain into the recharge areas but adding the constant pumping out water in the shaft and in the tunnels in addition to the current natural amounts of water drifting downward, equilibrium no longer exists. As excessive amounts of water are pumped out then the water table will be drawn down. The drawdown impacting wells along Bennett have already been identified as at risk. But what about wells that are outside this small area? As water table drops in the assemblage of mixed layers, fractured rocks and soil and pebble mixes, different areas can be affected differently. The shallower the well, probably the more affected change due to the underground water flow and/or the water table vertical height is lowered. Table 4.8-10 (pdf page 679) indicates that 99% of the ground water inflow into the mine is estimated to occur within 600 feet of the ground surface. My well ends before 600 feet below the surface. Will people like me lose their water source because as the mine water is pumped, groundwater will more easily flows into the dewatered tunnels to be pumped out quicker Dewatering is a risk to changing the ground water supply, lowering the water table and damaging the watershed.

Ind 555-11

The estimated amount of water in the current mine is about 385 million gallons (pdf page 665). The initial dewatering will drop the water in the shaft (and surrounding areas) from 250 feet bgs (below ground level) in the shaft to 3200 ft bgs. As this water is pumped out, more groundwater will flow in and collect to be pumped out. As the tunnels and shaft are pumped out, water from the upper levels will continue to flow in but deep waters stored in the base of water table are also drawn into the emptying mine workings to be pumped out and lowering the water table even more. Consider that historically the rate of dewatering the Brunswick Mine was 720 gpm (gallons per minute) to 800 gpm over 90 days. Rise wants to pump 3,600,000 gallons per day at the rate of 2500 gpm. What effect will this have on how the ground water flows through the surround land and enters the mine openings? What is the effect on the water table height not only under the Brunswick site but throughout the 2585-acre mineral boundary

Ind 555-12

area? How will this rapid removal affect the rebound/refill rate of the soils close to the underground mine workings and throughout the mineral boundary? How will this affect the dynamics of the cone of depression that is created when the water leaves existing higher-pressure areas in the underground surfaces and then creates lower-pressure areas as it flows out of the mine workings? Will the flow increase in speed as now there isn't any water in the shaft and tunnels to push back on entering water? There is no longer an equilibrium of water in and out of the mine workings? The North San Juan mining disaster created an ever-widening cone of depression and drew more and more water into it and away from the natural pathways. Many lost their wells. Are we willing to risk this?

Ind 555-13

Seismic stability in tunnels is a concern cited in the Geology, Soils, Mineral Resources section 1.8 (pdf page 43). Significant risk comes from the impact of blasting, creating new fissures and cracks in the walls of the new and old tunnels. Groundwater flowing into the mine may find new and different drainage pathways leaving former areas with less water available. The blasting and removal of rock may open new pathways flooding the mine and draining surrounding upper ground water levels in the watershed, not just under the Brunswick Industrial Site. What provisions have been developed for this loss of groundwater below the ground for wells and above the ground for habitat?

Ind 555-14

With the mining in this area since 1860s, there has been no observable movement of any faults (4.6-4) pdf page 533) but with the new blasting that will occur with reopening, will faults be shifted? DEIR (pdf page 534) states there is an *inferred* fault within 600 ft of shaft. How long is it? How deep is it? what type of fault is it? Does it affect or direct the underground water flow? If it "slips", what will be the range of changes in subsidence and in underground water flow? There are so many un-answered questions not asked or addressed in the report. The DEIR reports that it shows no recent movement. But with the pressure of the ground water removed as the dewatering drops the water table about 2500 feet will it continue to be stable? Will it be stable as blasting begins even at deep depths? There is not any mention of how to monitor this potentially dangerous situation.

Ind 555-15

Because of the complex geologic nature of this area, conceptual models are difficult to use. It is necessary to have a "full understanding of the lithological, structural, metalgenetic and hydrogeologic information (IMWA proceedings, p. 109). As I read the first EIR and now the second DEIR, I find that often the data is **limited** historic data or limited representations of focused recently collected data that often doesn't include much of the 2585-acre site. The Predictive simulations of Underground mine workings only estimate what might happen for the next 25 years (pdf page 661). What about the next 55 years? How much of the simulations are rough estimates from other mining experiences and how much is best guess because what is exactly structures and formations underground is only a guess. I wonder how my neighborhood will look with water table much lower; people drilling for wells much deeper but finding that they are now in the 1000' deep drilling areas that are contaminated by blasting residual materials that are miscible in water.

Ind 555-16

Why did Balance Hydrologic Inc test discharge samples for water quality only 3 times – Sept 2019, Dec 2019 and Jan 2020 and EMKO on Dec 2018 and 2019? (4.8-39 pdf page 661) Why so few? Why not have tests indicating year-round results over at least several years with seasonal variation? IMWA proceedings state, "to implement confident mathematical models, it is extremely important to have sufficient hydrogeologic data and hydraulic parameters" (page 109).

Ind 555-17

Similarly Graph 4.8.5 (page 4.8-13 pdf page 636) is a comparison of New Brunswick shaft levels with rainfall. Having taught science and the importance of data as evidence I wondered why there is so little data?

Only 2 rainfalls in such a short data collection period? I wanted to know if the ground had been dried out at the end of the long summer causing much of the rainwater to seep in and fill the pores or if the ground had been saturated so that the rainwater flowed into the shaft? Is this lack of details and clarity about the data used typical of RISE and its "experts"? Is there enough data collected and is collected using high standard in collection and interpreting the data? Even if it doesn't necessarily support RISE's point of view?

For all these reasons and more, the dismissal of the concern about decreasing ground water supplies or interfering substantially with ground water recharge with mitigation is less than significant is inappropriate (4.8.2, page 4.8-54 pdf page 677). Given the mine's operation probably won't disturb recharge because that happens higher up with snowpack melt and seasonal rains. But decreasing ground water across the entire 2585-acre site is complicated and its cumulative. The concern is how much will be removed and how the water table height will be impact. The concern centers on having less well productivity to total loss of the well to contamination. These aren't even addressed by Rise. Their focus highlighted that the project is not in a "basin" that's identified by DWR so continual quality groundwater to neighbors isn't an issue. Reducing soil groundwater is not addressed either. With a dropping water table, soil moisture that plants depend on is likely to be drawn down causing plants to be negatively impacted. Stressed trees are more likely to develop insect infestations like Bark Beetle. Stressed and dead vegetation significantly add to the risk of wildfire.

Ind 555-18

The water related issues are enough to not approve the re-opening of the mine. The kind of environmental damage that dewatering could cause is not "fixable". It takes water out of the surrounding area and risks draining wells and drying out the natural environment causing vegetation and trees to be stressed and die. This area is already high risk for wildfire, this would increase that risk substantially.

If your vote is to downplay these risks and more, then the EIR and authorizations concerning water should include:

- The entire 2585-acre site should be the minimum that is tested and monitored at Rise's expense for water quality, recharge, well production and ground water heights.
- Action Plans should be indicated if there are negative impacts in areas that are surrounded by or adjoin the mineral boundary as well.
- Fully assess the underground structure of the 2585-acre site to better determine the flow of ground water and how dewatering will impact the habitat and wells.
- State what damages will cause the mining authorization to be halted and be revoked permanently.
- Collection of more baseline data is needed for at least 1 to 3-year prior to granting permission to reopen so seasonal changes can be verified and more locally collected data can be collected and analyzed. This includes monitoring all wells throughout the entire mineral boundary for productivity, water quality and water table height of well water; soil moisture as it impacts vegetation in seasonal changes; discharge to the Wolf Creek watershed system including close to the drains openings and intervals downstream. This is not a complete list of the data that should be collected and reviewed.
- Cause Rise to set aside sufficient financial resources to **truly** pay for damaged wells and environmental cleanup should there be a negative impact due to mining. Bankruptcy would not

Ind 555-19

be an option should a disaster occur nor would selling the mine to another entity. Financial resources would have to continue beyond the 80-year proposed life of the mine operation.

- Instruct the County to seek out and hire hydrology related experts to install all types of monitoring equipment (such as gaging monitors, piezometers, thermologs, water quality assessments at drains, etc) across entire site, develop an action plan for routine monitoring- daily, weekly, monthly depending on instrument; and develop an action plan for shutting down part or all the mining process should significant changes be identified. Although the County hires and directs this department, Rise is responsible for all associated costs.

Ind 555-20

I think the adage: Hope for the best and plan for the worst is critical to regional environment is to survive should the re-opening be somehow approved. But this DEIR is inadequate. It's a case of hope for the best and don't plan for anything else.

Respectfully,

Mary Ann Coleman
14063 Greenhorn
Grass Valley, CA 95945

INDIVIDUAL LETTER 555: MARY COLEMAN

Response to Comment Ind 555-1

The commenter states that the Well Mitigation Plan is inadequate and is concerned about well production and groundwater quality. Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 555-2

The commenter asks what actions would be taken if another significant effect (related to water) was to develop on the Brunswick or Centennial sites or above and below the mineral rights area and what criteria would stop the mine temporarily or permanently. Please see Master Response 7 - Location of Future Mining Areas, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 3 - Operator Responsibility. The County has authority to enforce all conditions of approval and mitigation measures that are included in the DEIR. In the case of a violation, such as an impact to water wells where the operator failed to immediately replace water supply, as required under Mitigation Measure 4.8-2(b), the County would have authority to force compliance and/or to suspend or revoke the Mine's permits.

Response to Comment Ind 555-3

As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

With regard to groundwater and watershed impacts, please see Chapter 4.8 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 16 - Drought and Climate Change.

With regard to fire protection, please see Chapters 4.7, 4.11, 4.13 of the DEIR and Master Response 6 - Wildfire Impacts. The project's emission of greenhouse gasses and incremental contribution to climate change is addressed in Chapter 4.3 of the DEIR.

Response to Comment Ind 555-4

The commenter refers to pdf page 40, which is Page 1-10 of the DEIR. This page summarizes concerns brought forth in comment letters received during the Notice of Preparation of the DEIR, including potential insect infestations due to stress of local forests. The commenter provides no evidence that mine dewatering would result in stress to local forests which would result in insect infestations. Mine dewatering would not significantly impact groundwater dependent vegetation. Please see Master Response 33 - Groundwater Dependent Vegetation.



Response to Comment Ind 555-5

The commenter states that the DEIR does not address all possible impacts that re-opening of the mine might incur, but provides no specifics on what impacts they believe were not analyzed in the DEIR. Please see Responses to Comments Ind 555-3 and 555-4.

Response to Comment Ind 555-6

The groundwater model considers an area much larger than the mineral rights boundary. As stated on page 13 of Appendix K.3, the groundwater model domain encompasses approximately 2,810 square miles, and the finite-element grid contains 324,448 nodes and 626,386 elements within 31 layers. Please see Appendix K.3 and Figure 4-5 of Appendix K.3 of the DEIR. The model also considers the hydraulic conductivity of regional and local geological units (please see Figure 4-1 of Appendix K.3). In addition, please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202), as shown in Appendix A to this Final EIR.

Response to Comment Ind 555-7

Appendix K.8 of the DEIR provides a map of proposed monitoring well locations. Please see Figure 1 of Appendix K.8. Monitoring wells specially constructed for this purpose are proposed rather than domestic water wells and monitoring includes “real time” gauging equipment and regular water quality sampling. The applicant is required to fund all required well monitoring, which would be conducted by qualified hydrologists. Mitigation Measure 4.8-2(a) requires submission of reports to the Nevada County Environmental Health Department. With regard to the commenter’s request that the area of well monitoring be expanded and that domestic wells be monitored, please see Chapter 4.8 and Appendix K.8 of the DEIR, 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells, inclusive of water level and water quality, within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 555-8

The applicant would pay for any required well mitigation under the Well Mitigation Plan, Mitigation Measure 4.8-2(b) of the DEIR, and General Plan Policy 17.12. The Well Mitigation Plan has been modified to clarify the range of actions which would be taken outside of the E. Bennett Road area – Please see Appendix D to this Final EIR. Please also see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 555-9

The report referenced by the commenter discusses underground coal mines in Spain. Underground mining would not change the permeability of the rock surrounding the mine workings (please see Response to Comment Ind 555-3) and the increased permeability due to the creation of new mining voids is specifically analyzed in the groundwater model and DEIR. Please see Appendix K.3 and Figure 5.1 of Appendix K.3 of the DEIR. Underground mining would not cause "sinkholes", see Master Response 29 - Near Surface Workings.

Response to Comment Ind 555-10

The Regional Water Board adopted a Water Quality Control Plan, Fifth Edition, for the Sacramento and San Joaquin River Basins (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. The Basin Plan at page 2.3 states that the "…beneficial uses of any specifically identified water body generally apply to its tributary streams." The Basin Plan does not specifically identify beneficial uses for South Fork of Wolf Creek but does identify present and potential uses for the Bear River, to which the South Fork of Wolf Creek and Wolf Creek are tributary. Please see page 4.8-31 of the DEIR. The DEIR considered the beneficial uses for the Bear River with regard to potential impacts to South Fork of Wolf Creek and Wolf Creek.

With regard to the consideration of the regional groundwater flow, please see Response to Comment Ind 555-6. The groundwater model does not assume the underground strata is homogenous. Please see Appendix K.3 of the DEIR and Master Response 14 - Adequacy of Groundwater Model.

With regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells. The mine operator would be responsible for replacing water for impacted water wells even if they are beyond the limit of the mineral rights area, if such impacts are caused by the mine pursuant to Mitigation Measure 4.8-2(b) and General Plan Policy 17.12.

Response to Comment Ind 555-11

The analysis in the DEIR determined that 7 wells would be impacted by dewatering in the East Bennett Road area, and that other wells throughout the region would not be significantly impacted. With regard to the adequacy of the groundwater model and mitigation please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment 555-12

The analysis in the DEIR determined that 7 wells would be impacted by dewatering in the East Bennett Road area, and that other wells throughout the region would not be significantly impacted. With regard to the adequacy of the groundwater model and mitigation please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 555-13

Please see Responses to Comments Ind 555-3 and 555-9. Please also see Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 555-14

The commenter asserts that the DEIR should have evaluated the project's potential to activate local faults and induce seismic activity due to the removal of rock and mine dewatering. However, the magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see NV5 Memo attached to the Final EIR as Appendix P.

Response to Comment Ind 555-15

The commenter asserts that the DEIR is flawed because the data used to analyze impacts is limited and a "full understanding" is necessary. However, it can always be argued that more data should be obtained, and the data used for any analysis is by definition "limited" to the scope of that data. In this case, the data used to assess dewatering impacts included historic and current data points, which were peer-reviewed by the County's independent expert and found to be adequate as a basis for the analysis. As stated by California courts, "the need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d at p. 406.) With regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 555-16

Please see Master Response 35 - Discharge to South Fork Wolf Creek, with regard to the number of samples taken. Please also see Response to Comment Ind 555-15 regarding the request for more data.

Response to Comment Ind 555-17

Figure 4.8-5 of the DEIR shows a graph of rainfall for entire water years which aggregates all rainfall events in each water year.

In regard to the adequacy of the groundwater model and mitigation, please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 555-18

Please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 555-19

Please see Chapter 4.8 and Appendix K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 16 - Drought and Climate Change, and Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 555-20

The commenter generally states the DEIR is inadequate. Responses to specific comments are provided above.

Individual Letter 556

From: Mary Good <coachspirit@yahoo.com>
Sent: Monday, April 4, 2022 9:38 AM
To: Idaho MMEIR
Subject: I oppose the Idaho-Maryland Mine

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To: Matt Kelley, Senior Planner, Nevada County Planning Department:

Ind 556-1 I am against reopening the Idaho-Maryland Mine, for a variety of reasons. As a resident who chose to retire to this county especially for it's beauty and tranquility, I am appalled that the County would be considering entering into an agreement with Rise Gold to open the mine.

Ind 556-2 The history of gold mining has demonstrated that the resulting environmental degradation is not worth the undertaking. This mine poses numerous potential risks to the water table, to our pristine creeks, as well as the ensuing noise and increase in air pollution are alarming to me. The threat to the water table makes no sense during our historic drought.

Ind 556-3 As many have noted, the allure of our County and its primary economic driver is tourism. People are drawn to our beautiful foothills to escape the noise of the city. But we are not the only foothill community they can choose to visit. I believe an active mine is a risk to this tourist trade.

Please note my opposition to this endeavor. Thank you.

Mary Good
Grass Valley CA

1

INDIVIDUAL LETTER 556: MARY GOOD

Response to Comment Ind 556-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2 for the commenter's social concerns. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 556-2

For concerns related to water table and drought, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Air pollution is addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, none of the individual or combined activities associated with long-term operations of the proposed project are projected to generate noise in excess of the applicable noise standards. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. MM 4.10-2 requires implementation of an ongoing comprehensive noise monitoring program under County oversight. If operational noise levels are found to exceed the applicable County noise standards, the County shall require cessation of the mine operations until additional engineering controls can be implemented.

Please see Master Response 35 – Discharge to South Fork Wolf Creek, for concerns related to creeks.

Response to Comment Ind 556-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 557

2/25/2022

Nevada County Planning Department

950 Maidu Ave.

Nevada City, CA 95959-8617

Ind 557-1 Dear Matt Kelley,

I wrote to you in 2020 and my concerns for the proposed re-opening of the Idaho Maryland Mine by Rise Gold have only increased over the last 2 years!

My concerns are as follows:

Ind 557-2 *The dewatering of the existing underground mine workings and the hydrologic threat that it poses to domestic/residential wells, the impact on existing waterways/creeks, and the negative impact on water quality. The "treated" water entering the south fork of Wolf Creek will contain contaminants.

Ind 557-3 *The creation of new underground mine workings which will require drilling and blasting that may result in the destabilization of rock fissures that are currently providing water to wells. Not to mention the strong potential for a catastrophic explosion and potential loss of life!

Ind 557-4 *The processing of gold mineralization and rock will cause noise and air pollution in nearby residential areas.

Ind 557-5 *The placement of engineered fill that is unstable will require utilization of compaction equipment and that in turn will create more noise pollution and ground disturbance.

Ind 557-6 *The off-site export of fill will create traffic and noise problems and the idea that the fill will support local construction projects is ludicrous. In addition, during a wildfire evacuation, the residents attempting to leave will be dramatically impacted if they are forced to intermingle with the trucks using the same route!

Ind 557-7 *The limited construction of a potable water pipeline to residences ONLY on a portion of East Bennet is narrow in scope! The real impact could be damaging for miles. A bond would have to be floated and NID would have to address the water needs-is NID prepared to take this on? Residences could go without water for years!

Ind 557-8 *Identified wells on the Groundwater Hydrology and Water Quality Analysis Report, particularly Section 4.2.2.3 and Table 4-4 appears narrow in scope. Once again many wells outside the defined areas in this report could be effected and even a slight drawdown of one's well water is significant, especially in drought years.

Ind 557-9 *The reports use qualifying verbiage such as "predicted, largely confined, average, base flow rates, light-industrial, minimize potential etc." is that verbiage being used meant to minimize Rise Gold's responsibility when damage occurs? The answer is a resounding yes!

Ind 557-10 *The U.S. Department of Labor Fatality Reports: Mine Safety and Health Administration under Metal/Non-metal Fatalities that in 2020 there were 24 deaths of the 231,185 miners working in that field. That number indicates that there's obvious danger, is Rise Gold ready for fatalities? Many of the deaths were in the haulage process, in other words, driving fatalities!

Ind 557-11 *Rise Gold requested a variance on building height from the current 45 feet to 165 feet. That will be an eye sore to everyone!

Ind 557-12 *The damaging effect on home values will be incalculable. Home values will drop overnight by hundreds of thousands of dollar, especially within a 10 mile radius of the mine. Tax revenue will be impacted.

Ind 557-13 We have lived in Nevada County for 50 years and love this community, however, in speaking with many of our neighbors, between the fire danger and rising home owner insurance costs, Rise Gold will be the last straw that will force us to move.

Please consider your current tax paying residents as your most important asset, not Rise Gold!

Thank you,

Mary Lee

PO Box 782

Cedar Ridge, CA 95924

530-272-1651

INDIVIDUAL LETTER 557: MARY LEE

Response to Comment Ind 557-1
This comment is introductory in nature and does not discuss the adequacy of the DEIR. Comment noted.

Response to Comment Ind 557-2
The commenter is concerned about the dewatering of the Idaho-Maryland Mine and impacts to the South Fork Wolf Creek due to the discharge of treated water. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), which found that the impact to groundwater wells from the dewatering of the mine to be less than significant after mitigation. (DEIR, p. 4.8-54.) The DEIR also found that any impacts associated with the discharge of treated water into South Fork Wolf Creek would be less than significant after mitigation. (DEIR, p. 4.8-41.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 557-3
The commenter states that the creation of new underground mine workings will result in the destabilization of rock fissures providing water to wells and that the underground blasting may result in the loss of life. As discussed on pages 15-19 of Appendix M (Blasting Report), numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

The hazard from the use of explosives is analyzed in Chapter 4.7 of the DEIR and the impact is less than significant after mitigation. (DEIR, p. 4.7-22.) Specifically, the DEIR found that numerous state and federal regulations have made the use of explosives underground mining projects extremely safe two incidents in the past 25 years. (DEIR, p. 4.7-28.)

Response to Comment Ind 557-4
The commenter states that the gold mineralization process will cause noise and air pollution but does not provide further information. The DEIR analyzes air quality impacts in Chapter 4.3 and noise impacts in Chapter 4.10. Impacts for both categories (with the exception of one temporary noise related impact) are less than significant after mitigation. For example, mineral processing noise is evaluated on page 4.10-38 of the DEIR and found to be less-than-significant (i.e., below the County's applicable noise standards). The only noise-related impact that would be significant and avoidable would be the installation of the potable water pipeline along East Bennett Road. (DEIR, p. 4.10-30.)

Response to Comment Ind 557-5
The commenter states that the placement of engineered fill will create noise pollution. The DEIR found that noise from compaction of engineered fill is less than significant after mitigation. (DEIR, p. 4-10-31.) The DEIR also found that disturbance of ground (vegetation communities, wildlife, wetlands) from placement of engineered fill is less than significant after mitigation. (DEIR, p. 4.4-57.)

Response to Comment Ind 557-6
The commenter states that the hauling of engineered fill will create adverse noise impacts. The commenter also claims that it is "ludicrous" to assume engineered fill will be used for local

construction projects but does not provide additional information. The commenter also states that truck traffic from the project would impede an evacuation during a wildfire. The DEIR found that noise-related impacts resulting from traffic would be less than significant after mitigation. (DEIR, p. 4.10-31, 37.) For example (DEIR, p. 4.10-37,38):

> As part of the Noise and Vibration Analysis prepared by BAC, maximum heavy truck traffic noise levels were assessed for the delivery of engineered fill material to off-site vendors via SR 20/49. The analysis assumed 200 heavy truck trips per day (100 round trips) and employee trips, as previously discussed.
>
> Table 4.10-16 presents the existing ambient noise levels and anticipated existing plus-project traffic noise levels at the nearest residences to each roadway segment, as well as the project-related increase in traffic noise levels and the impact assessment threshold for each roadway segment based on the criteria presented in Table 4.10-5.
>
> As shown in Table 4.10-16, the traffic noise level increase from the transport of fill from the Brunswick Industrial Site to the highway and from employee commutes would not exceed the applicable thresholds of significance at any of the receptors. Therefore, noise-related impacts from off-site heavy truck and employee traffic would be less than significant.

Regarding the assertion that engineered fill would not be used in local construction projects, the commenter is referred to Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets. The commenter is also referred to Master Response 5 - Evacuation Zones regarding the impact of the project on evacuations.

Response to Comment Ind 557-7

The commenter states that the DEIR is too narrow in scope by only proposing NID service to 30 residences on East Bennet Road. The commenter is referred to Master Response 7 - Location of future mining areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 557-8

The commenter states that the DEIR underestimates the number of private wells that could be impacted by the dewatering of the mine, especially in times of drought. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 557-9

The commenter asserts that certain language within the DEIR is intended to insulate the Project Applicant from liability. The DEIR provides an analysis of project impacts in accordance with the requirements of CEQA. The DEIR does not minimize or otherwise insulate the Project Applicant from liability. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 557-10

The commenter cites statistics from the federal Mine Safety and Health Administration. This comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 557-11

The commenter states that the project will result in a 165-foot structure with adverse aesthetic impacts. The DEIR analyzed aesthetic impacts in Chapter 4.1. The DEIR found that the 165-foot-tall headframe for the Brunswick Site would contribute to a significant and unavoidable aesthetics impact. (DEIR, p. 4.1-15.)

Response to Comment Ind 557-12

The commenter states that the project will adversely impact home values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 557-13

The commenter states that the fire danger and rising homeowner insurance costs as a result of the project will force longtime residents to leave the area. The DEIR analyzed wildfire impacts in Chapter 4.13 and found the impacts to be less than significant with one impact requiring mitigation (DEIR, p. 4-13.2.) Regarding property values, the commenter is referred to Master Response 2 - Social and Economic Impacts.

Individual Letter 558

Mary Padua
PO Box 2013
Nevada City , Ca 95959



Nevada County Planning Dept.
Attn: Matt Kelly
950 Maidu Ave, Suite 170
Nevada City , Ca 95959

Regards: Idaho Maryland Mine Project

Dear Sirs:

This letter is support of NOT approving the Idaho Maryland Mine Project.

Ind 558-1 We are such a drought right now and the use any water to towards mining should be nixed right now . Our community is a scary place of many of us losing our wells to lack of water .

Ind 558-2 The truck loads of waste from this project will impact our roads and well being of the community safety.

If you decide to vote yes for this project to continue , I would be terrified to see the out come the future holds , for this little community who loves where live.

Ind 558-3 I beg of you to please please do not let this crime happen here in our beautiful community.

With Respect for our future

Mary Padua

marypadua@yahoo.com

INDIVIDUAL LETTER 558: MARY PADUA

Response to Comment Ind 558-1

The comment does not address the adequacy of the DEIR. Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 558-2

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Response to Comment Ind 558-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 559

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

April 3, 2022

Dear Mr. Kelley,

I am writing today in opposition of the propsed re-opening of the Idaho Maryland Mine in Grass Valley. I have lived and worked in the county for 20 years including raising my family here. I will address my concerns from the DEIR about the proposed impacts on Air Quality, Section 4.3 in the county.

Ind 559-1

My understanding is that the DEIR substantially underestimated emmissions of air pollutants and green house gases from trucks hauling engineered fill from the Bruswick site to offsite locations. Remediation of the Centenial Site was not included in the CEQA analysis for the project, so it cannot be used to understand the impact of daily truck hauls with engineered fill. The haul trucks will have to go to farther away dump sites. The NOx emmissions would be substantailly higher than what is stated in the DEIR and exceed the Northern Sierra Air Quality Managment Districts threshold.

Additionally, the mitigation measures in the DEIR only address the first year during construction of the project, not the entire 80 years of the project. Therefore, longterm mitigation of NOx, ROG, and PM10 is not addressed for the 80 year proposed life of this project.

Ind 559-2

The air quality in Western Nevada County is already bad enough at certain times of year with the upwind drift from Sacramento and summer forest fires. Adding any additonal air poluution will wreak furher havoc on the lungs of NevadaC ounty residents.

These two aspects of the degradation of air quality in the county need to be adequately addressed.

Thank you,

Mary Peterson
311 Park Ave.
Nevada City, CA

INDIVIDUAL LETTER 559: MARY PETERSON

Response to Comment Ind 559-1

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 559-2

The comment expresses a general opinion that the mitigation measures only apply to the first year of project construction.

Please see Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.

Individual Letter 560

Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Ave. Suite 170
Nevada City, CA. 95959-7902

Dear Matt Kelley,

We are all very lucky to live in Nevada County with its fresh mountain air, beautiful forests and the Yuba River running through it. It is very precious and we need to do all we can to preserve it. I am very concerned about the planned reopening of the Idaho Maryland Mine. The DEIR report that was submitted has several flaws and issues that do not tell the true impact that the mine will have on Grass Valley and Nevada County. How can the mine be approved with all of these mistakes in the report?

Ind 560-1

Ind 560-2 The ground water model has flaws in the initial start point and baseline data assumptions. The entire analysis is thrown off because of this.

Ind 560-3 There needs to be more management than is in the report regarding dealing with the mine waste. Asbestos is a huge problem, the report needs to state how it will be dealt with.

Ind 560-4 The report does not include any information on cleaning up the Centennial Mine site. This is the site where the mine waste will be dumped. It is required by the California Environmental Act to be included in the DEIR report.

Ind 560-5 Missing construction times estimates throw off the entire analysis of noise, traffic and air.

Ind 560-6 There is a significant threat to the water supply for wells in a much larger area then is in identified in the DEIR report. How could pumping out one million gallons of water a day not have a negative impact on the community? Besides many wells running dry what impact will this have on Wolf Creek and the aquatic life? The change in water temperature and the loss of stream bed and stream bank habitat will have a big impact. The draw down of the local water table has not been studied. What impact will it have on wet land, meadow and forest habitats?

These are just a few of the flaws in the DEIR report. The Idaho Maryland mine's reopening should not be approved for many reasons. This flawed report is one major reason. The county needs to know what the consequences of opening the mine would be. This report does not give an accurate analysis of opening the mine.

Ind 560-7 A concerned resident of Nevada County,

Mary Lou Swagerty
14296 Tahoe View Drive
Grass Valley, CA 95945
mlswagerty@gmail.com

INDIVIDUAL LETTER 560: MARY SWAGERTY

Response to Comment Ind 560-1
The commenter is generally opposed to the project and notes that the DEIR contains numerous mistakes. The commenter's opposition to the project is noted for the decisionmakers. Responses to specific comments are provided below.

Response to Comment Ind 560-2
The commenter states that the DEIR's Groundwater Model is flawed due to initial start date and inaccurate baseline assumptions but does not provide additional detail. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Ind 560-3
The commenter states that the DEIR must discuss how asbestos will be managed. The DEIR states that asbestos-related impacts would be less than significant after mitigation. (DEIR p. 4.3-80.) The commenter is referred to Master Response 22 - Conservatism of Asbestos Assumptions, and Master Response 23 - Adequacy of Asbestos Sampling.

Response to Comment Ind 560-4
The commenter states that the DEIR must include a discussion of the remediation cleanup of the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 560-5
The commenter states that missing construction time estimates from the DEIR skew the analysis of several project impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

Response to Comment Ind 560-6
The commenter states that project will adversely impact groundwater wells in areas beyond those identified in the DEIR, that the discharge of treated water will impact aquatic resources, and that discharge will affect the temperature of surface water. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 33 - Groundwater Dependent Vegetation. As noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 560-7
The commenter states that the project should not be approved. The commenter's opposition to the project is noted for decision makers. The Commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 561

From: maryannemurphyesq
To: Heidi Hall; Matt Kelley
Subject: Anti Idaho Maryland Mine - YouTube
Date: Friday, March 4, 2022 2:31:36 PM

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Ind 561-1

https://m.youtube.com/watch?v=dMUvb1oksZg

This mine does not fit the county's plan. How can an 80 year permit that mines the MotherLode fit the plan. You do it for 1 you more will come and change forever the landscape of these Communities. Those who vote " yes" to an 80 year permit should be honest about what it will mean to the communities.

Maryanne Murphy
Woodstock Drive

INDIVIDUAL LETTER 561: MARYANNE MURPHY

Response to Comment Ind 561-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 562

From: maryannemurphyesq <themislaw@protonmail.com>
Sent: Thursday, March 24, 2022 8:06 AM
To: Matt Kelley; Planning; BOS Public Comment
Cc: Heidi Hall
Subject: DEIR- RiseGold Application

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Dear Planning Commission and Board,

I am a real estate broker as well as a lawyer.

Ind 562-1 The application at issue is an 80- year plan to mine gold within claimed mineral boundary rights. Yet, the DEIR does not address what happens to the neighborhoods and commercial developments within those alleged and claimed rights if they are explored by the mining company.

So, the picture would be mining under developed commercial and residential neighborhoods since the mid 20th Century which may even involve the airport and Dignity Health.

How many buyers do you think would buy a home or business with 365 days per year 24/7 gold mining going on under the property.

Ind 562-2 Can you see a fire insurer insuring property with abnormally dangerous activity and product beneath it? I think the insurance risks are insurmountable. Consider the Colfax fire of last year. Just having a nearby fire threat to such an operation would need to consider expanding the scope of community evacuations.

Ind 562-3 We live in a densely populated area where nearly 1/3 of the people in the County reside as between the 3 communities of Penn Valley, Grass Valley, and Nevada City. The success of this mine will change the character of the Brunswick basis and displace neighborhoods as we know it and in any event reduce the marketability, insurability and value of property.

Right now, Nevada County enjoys good revenues from real estate activity. The 2020-2021 budget for the county expected growth to continue from these revenues. If you put this 80 year mine in place, I that that growth will likely stop and likely reverse itself as the character of a successful mining operation takes over.

Maryanne Murphy, Esq.
Nevada City, CA 95959
direct (408) 921-2338

Sent with ProtonMail secure email.

INDIVIDUAL LETTER 562: MARYANNE MURPHY

Response to Comment Ind 562-1

The commenter asserts that the DEIR does not address what happens to the land uses within the mineral rights zone, but does not provide specific examples that would allow for a detailed response.

Please see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 562-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 5 and 6.

Response to Comment Ind 562-3

The comment does not address the adequacy of the DEIR. Property values is a concern outside the scope of CEQA - please see Master Responses 1 and 2. The commenter provides no evidence to support the assertion that the project will displace neighborhoods. Currently, no residences are located on the Brunswick and Centennial Industrial Sites, so direct displacement would not result from the project. It is otherwise speculative to conclude that the project's impacts to the physical environment would indirectly displace neighborhoods.

Individual Letter 563

From: maryannemurphyesq
To: BOS Public Comment
Subject: Fwd: Public Comment: Planning Commission -Special Meeting for Nevada County 3/24/2022 Re: Application of RiseGold to Reopen the Idaho Maryland Mine
Date: Friday, March 18, 2022 7:56:34 AM

Dist 1

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I am sending a copy of my public comment provided to the planning commission to the Board for its separate consideration. Thank you. Maryanne Murphy

--------- Forwarded message ---------
From: maryannemurphyesq<themislaw@protonmail.com>
Date: On Thu, Mar 17, 2022 at 1:11 PM
Subject: Fwd: Public Comment: Planning Commission -Special Meeting for Nevada County 3/24/2022 Re: Application of RiseGold to Reopen the Idaho Maryland Mine
To: Planning <Planning@co.nevada.ca.us>
Cc: Matt Kelley <Matt.Kelley@co.nevada.ca.us>

Dear Planning Commission:

As a homeowner in Nevada County, I request a review of the status of RiseGold's mineral rights, notice under RiseGold's Plan (hereinafter "Plan), and a review of the County General Plan before any further granting of activity on RiseGold property can be considered or provided. The granting of activity which RiseGold proposes for 80 years is a serious exercise of the County's police power over the lives and assets of its property owners should a conditional use permit be granted to it in order to operate its mine.

Ind 563-1

It is my position that the granting of a heavy industrial conditional use permit or any past permit, if any, to Rise Gold may have been in error, under California and or US law. In addition, given the issue of surface property rights versus mineral rights as explained below, the notice of Plan is insufficient on this basis alone and should have been forwarded to each property owner within the claimed mineral boundary rights under the Plan especially in light of the fact that RiseGold seeks an 80 year permit. Sufficient notice would then be required to allow a landowner to take steps consistent with its rights which may not just involve a claim for abandonment of mineral rights.

I believe that the owner of the Mine may have abandoned any mineral rights and transferred nothing to RiseGold. I base this position in part on the fact that the mine has been closed since the mid 20th century and on the overwhelming development of our area since with anything but gold mining under the County's General plan. **A thorough legal review of RiseGold's deed and filings by previous owners would be necessary at a minimum to determine if mineral rights exist.**

Also, a thorough legal review of the rights of property owners as they relate to the alleged mineral boundary rights of the mine would need consideration, which of necessity would include confirmation of the mineral boundary rights by survey.

As you may know, US laws regulating mining and mineral rights typically prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals. This is in part to protect the homeowner from development of mining activity in densely populated areas. See generally, USC 43 section 299. Has anyone also looked at California laws in this context which I think may be similar.

Ind 563-2

Thank you for considering this email, I appreciate a response to my questions as follows:

Ind 563-3 1. Does RiseGold have mineral rights for the activity proposed under its plan?
Ind 563-4 2. Is the proposed RiseGold plan (hereinafter " Plan") and its land use and activity appropriate under the County general plan?
Ind 563-5 3. Is the proposed Plan and its land use and activity appropriate under the County general plan or other County regulations in the densely populated, agricultural, residential, and commercial areas of Grass Valley and Nevada City?
Ind 563-6 4. Were property owners who are located in the proposed mineral rights under the Plan sufficiently and/or adequately notified of the proposed RiseGold Plan?
Ind 563-7 5. Does the proposed mineral boundary rights under the Plan in fact reflect RiseGold's actual mineral boundary rights?
6. Under California and/or US law, do the property owners within the proposed mineral boundary rights have a potential or actual claim for abandonment of the mineral rights under the Plan?
7. **Under California and/or US law, do the property owners within the proposed mineral boundary rights prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals?**

Ind 563-8

Thank you for your consideration

Maryanne Murphy, Esq.
4089212339
Nevada city, CA

https://www.easylawlookup.com/California-Law/Civil-Code/pg-102/_easylookup.blp?data=CIVILCODE&sidfw=&site=EASY&location=78232&spon=&stype=P&sterm=+&smode=AND&sexact=ON&pgno=102&par=2219&dlevel=5#par_2219

I am also aware of the following summary under mineral property rights by another lawyer.

Ind 563-9

Regaining Lost Mineral Rights

In California, the law allows the owner of real property to recover lost mineral rights provided that the mineral right is dormant for at least 20 years. A dormant mineral right is one where no exploration, mining, drilling or other operations are present on the property. There must also be no property taxes assessed or paid on the separate mineral right and no notice of intent to keep the mineral right filed by the owner in the past 20 years.

https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#

INDIVIDUAL LETTER 563: MARYANNE MURPHY

Response to Comment Ind 563-1
This comment is similar to Comment Ind 565-1. Please see Response to Comment Ind 565-1.

Response to Comment Ind 563-2
Rise Gold purchased the mineral rights from the previous owner. Property ownership issues are not considered an environmental issue under CEQA. Please see Responses to Comments Ind 565-1 and Ind 565-2.

Response to Comment Ind 563-3
Land use impacts were addressed in Chapter 4.9 of the DEIR, which concluded that the project is generally consistent with the County General Plan. In addition, County staff will conduct a detailed General Plan consistency review as part of the staff report to the decisionmakers. General Plan consistency is ultimately within the purview of the Nevada County Board of Supervisors.

Response to Comment Ind 563-4
Land use impacts were addressed in Chapter 4.9 of the DEIR, which concluded that the project is generally consistent with the County General Plan, including consideration of different nearby land uses and densities.

Response to Comment Ind 563-5
The County provided notice to property owners and the community consistent with applicable local and state law.

Response to Comment Ind 563-6
The mineral rights boundary as presented in the DEIR corresponds to the mineral rights owned by Rise, as disclosed in the deeds available for public review in the Official Records of Nevada County. Property ownership issues are not considered an environmental issue under CEQA.

Response to Comment Ind 563-7
Please see Response to Comment Ind 565-2.

Response to Comment Ind 563-8
In California, where mineral rights are severed from surface ownership, the mineral estate is considered the “dominant” estate and may make use of the property as reasonably incident for extraction of minerals. (*Bourdieu v. Seaboard Oil Corp. of Delaware* (1940) 38 Cal.App.2d 11, 17.) However, such use of the surface estate is subject to reasonable accommodation of surface uses. Nonetheless, property ownership issues are not considered an environmental issue under CEQA.

Response to Comment Ind 563-9
Please see Response to Comment Ind 563-7.

Individual Letter 564

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: MARYANNE MURPHY

Address: 13268 Woodstock Drive, Nevada City, CA 95959

Organization (if applicable): member, Nevada County Association Realtors

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 564-1

The DEIR does not address what happens to the properties within the mineral rights boundary and to the impact to quality of air, water, and land, noise & as a fire hazard. If Rise Gold explores its mineral rights instead it refers generally to no divided neighbourhoods. So the pictured would be to examine the effects from mining under the developed and existing commercial and residential properties which may even include the airport & Dignity Health.

Ind 564-2

As to fire specifically, the DEIR seems to say that no very high fire risk exists in the plan. But we know that the plan include blasting dynamite and other heavy industrial products that haven't been properly assessed for storage, use or risk. ~~[illegible]~~ For example ~~the~~ the Colfax fire was advancing down Highway 174 - last year. If that fire had hit the mine - what could be the potential devastation to the area from igniting dynamite with premises.

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 564: MARYANNE MURPHY

Response to Comment Ind 564-1

Please see Response to Comment Ind 562-1.

Response to Comment Ind 564-2

Wildfire impacts are discussed in Chapter 4.13 of the DEIR, and Hazards including explosion risk is addressed in Chapter 4.7 of the DEIR. Please also see Master Response 6 – Wildfire Impacts, and Master Response 10 – Explosives, Reagents, and Brunswick Fill.

Individual Letter 565

From: maryannemurphyesq <themislaw@protonmail.com>
Sent: Tuesday, March 8, 2022 10:00 AM
To: Heidi Hall; BOS Public Comment; Matt Kelley
Subject: RiseGold's application re: notice of and permitting process

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Dear Board, Mr. Kelly and Ms. Hall:

It is my position that the granting of a heavy industrial permit or any permit to RiseGold may have been in error under California and or US law. In addition, given the issue of surface property rights versus mineral rights as explained below, the notice of plan is insufficient on this basis alone and should have been forwarded to each land owner within the claimed mineral boundary rights of RiseGold especially in light of the fact that RiseGold seeks an 80 year permit. Sufficient notice was required to allow a landowner to take steps consistent with its rights.

I believe that the owner of the Mine may have abandoned any mineral rights and transferred nothing to RiseGold. I base this position in part on the fact that the mine has been closed since the mid 20th century and on the development of this area with anything but gold mining under the County's General plan.

A thorough legal review of the deed and filings of previous owners would be necessary at a minimum to determine if mineral rights exist.

Ind 565-1

Also, a thorough legal review of the rights of residents and businesses and other habitants as they relate to the alleged mineral boundary rights of the mine would need consideration, which of necessity would include confirmation of the mineral boundary rights by survey.

As you may know, US laws regulating mining and mineral rights regulating mining and mineral rights typically prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals. This is in part to protect the homeowner from development from mining activity in densely populated areas. See generally, USC 43 section 299. Has anyone also looked at California laws in this context which I think may be similar.

As a homeowner in Nevada County, I think these answers should be secured before any further granting of activity on RiseGold property can be considered or provided. The granting of activity such as this for 80 years is a serious exercise of the County's police power over the lives and assets of its residents.

Thank you for considering this email. If there is any information that you have in response to my specific issues above, I would appreciate the same.

Maryanne Murphy, Esq.
4089212338
Nevada city, CA

1

Ind 565-2

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I am also aware of the following summary under mineral property rights by another lawyer.

Regaining Lost Mineral Rights

In California, the law allows the owner of real property to recover lost mineral rights provided that the mineral right is dormant for at least 20 years. A dormant mineral right is one where no exploration, mining, drilling or other operations are present on the property. There must also be no property taxes assessed or paid on the separate mineral right and no notice of intent to keep the mineral right filed by the owner in the past 20 years.

https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#

2

INDIVIDUAL LETTER 565: MARYANNE MURPHY

Response to Comment Ind 565-1

The commenter asserts that the mineral rights owned by Rise may have been abandoned but provides no evidence or legal citation for that assertion. Property ownership issues are not considered environmental impacts under CEQA. The commenter cites United States Code, Title 43, Section 299 for the proposition that federal law limits the proposed project's operations; however, this statute relates to a reservation of coal rights on land owned by the federal government, and mining operations on federal lands subject to unpatented mining claims. This statute is not applicable to the project, because the project sites consist of private mineral estates on privately held land, and do not involve federally owned land. Notice has been provided to the community consistent with CEQA and applicable state and local laws. The commenter's opposition to the project is noted for the decisionmaker's consideration.

Response to Comment Ind 565-2

The commenter implies that the mineral rights are "dormant" under the California Dormant Mineral Right Act and are therefore invalid. However, under the California Dormant Mineral Right Act, mineral rights are only considered "dormant" when there has not been mining activity, a separate tax assessment, or a transfer of those rights in the last 20 years. (see California Civil Code Section 883.220.) The mineral rights were transferred to Rise within the last 20 years; thus, the minerals are definitionally not "dormant." Moreover, mineral rights cannot be extinguished under the California Dormant Mineral Right Act unless a court action is filed by the surface owner, such that mineral rights do not automatically extinguish. (see California Civil Code Section 883.221 through 883.270.) Finally, even where the mineral rights to a property are indeed "dormant" and an action is filed by the surface owner, California law permits the mineral rights owner to simply record a notice evidencing its intent to preserve the mineral right, which results in dismissal of the case. (see California Civil Code Section 883.250.) In this case, Rise's mineral rights are not dormant and Rise intends to preserve its mineral rights.

Individual Letter 566

From: [redacted]
To: [redacted]
Subject: RiseGold's application re: notice of and permitting process
Date: Tuesday, March 8, 2022 10:43:18 AM

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Dear Board, Mr. Kelly and Ms. Hall:

It is my position that the granting of a heavy industrial permit or any permit to RiseGold may have been in error under California and or US law. In addition, given the issue of surface property rights versus mineral rights as explained below, the notice of plan is insufficient on this basis alone and should have been forwarded to each land owner within the claimed mineral boundary rights of RiseGold especially in light of the fact that RiseGold seeks an 80 year permit. Sufficient notice was required to allow a landowner to take steps consistent with its rights.

I believe that the owner of the Mine may have abandoned any mineral rights and transferred nothing to RiseGold. I base this position in part on the fact that the mine has been closed since the mid 20th century and on the development of this area with anything but gold mining under the County's General plan.

A thorough legal review of the deed and filings of previous owners would be necessary at a minimum to determine if mineral rights exist.

Also, a thorough legal review of the rights of residents and businesses and other habitants as they relate to the alleged mineral boundary rights of the mine would need consideration, which of necessity would include confirmation of the mineral boundary rights by survey.

Ind 566-1

As you may know, US laws regulating mining and mineral rights regulating mining and mineral rights typically prohibit the mineral owner from damaging or interfering with the use of any homes or other improvements on the land when extracting minerals. This is in part to protect the homeowner from development from mining activity in densely populated areas. See generally, USC 43 section 299. Has anyone also looked at California laws in this context which I think may be similar.

As a homeowner in Nevada County, I think these answers should be secured before any further granting of activity on RiseGold property can be considered or provided. The granting of activity such as this for 80 years is a serious exercise of the County's police power over the lives and assets of its residents.

Thank you for considering this email. If there is any information that you have in response to my specific issues above, I would appreciate the same.

Maryanne Murphy, Esq.
4089212338
Nevada city, CA

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I am also aware of the following summary under mineral property rights by another lawyer.

Ind 566-2

Regaining Lost Mineral Rights

In California, the law allows the owner of real property to recover lost mineral rights provided that the mineral right is dormant for at least 20 years. A dormant mineral right is one where no exploration, mining, drilling or other operations are present on the property. There must also be no property taxes assessed or paid on the separate mineral right and no notice of intent to keep the mineral right filed by the owner in the past 20 years.

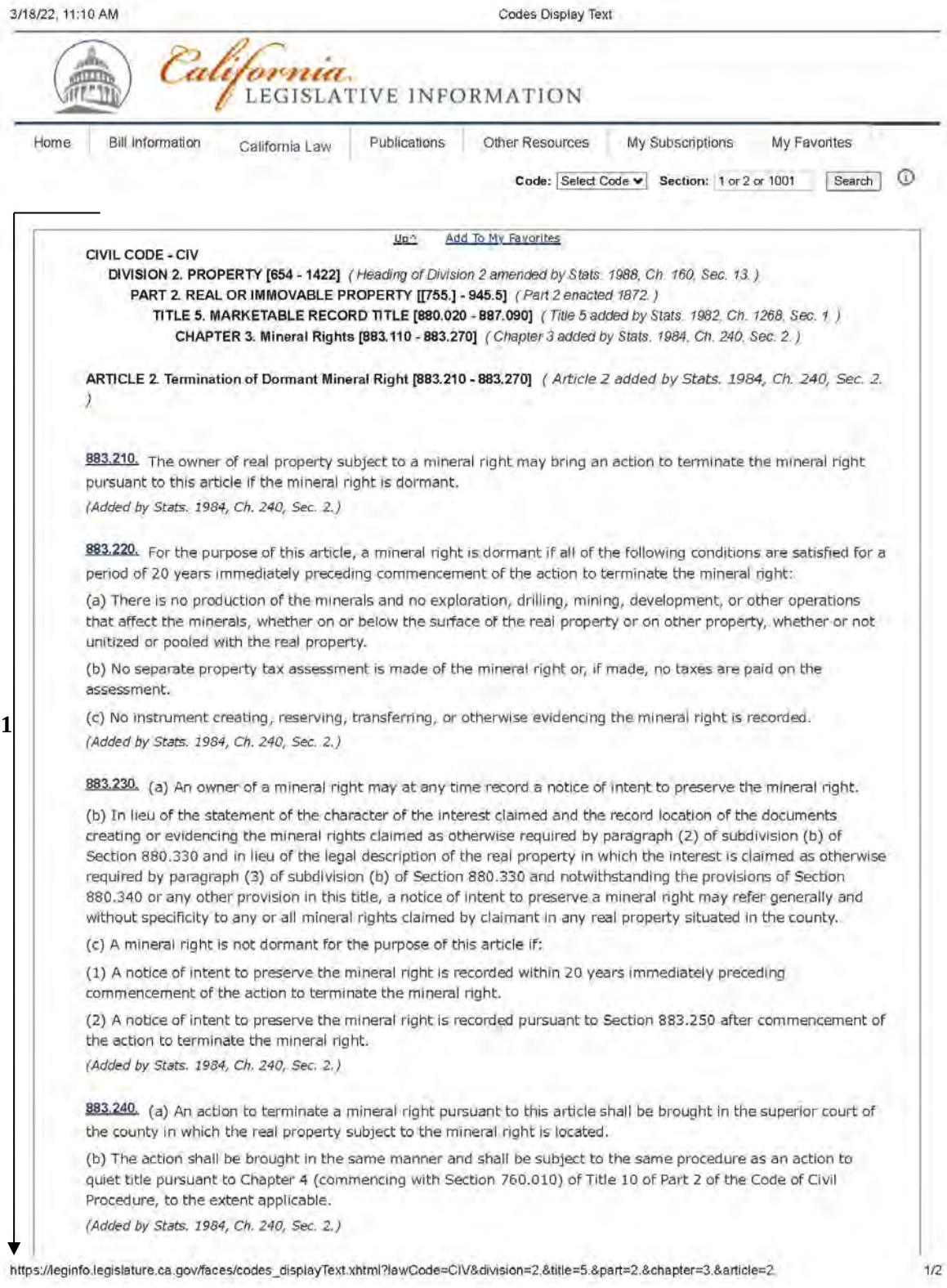
https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=CIV&division=2.&title=5.&part=2.&chapter=3.&article=2.#

INDIVIDUAL LETTER 566: MARYANNE MURPHY

Response to Comment Ind 566-1
Please see Response to Comment Ind 565-1.

Response to Comment Ind 566-2
Please see Response to Comment Ind 565-2.

Individual Letter 567



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DIVISION 2. PROPERTY [654 - 1422] (Heading of Division 2 amended by Stats. 1988, Ch. 160, Sec. 13.)

PART 2. REAL OR IMMOVABLE PROPERTY [[755.] - 945.5] (Part 2 enacted 1872.)

TITLE 5. MARKETABLE RECORD TITLE [880.020 - 887.090] (Title 5 added by Stats. 1982, Ch. 1268, Sec. 1.)

CHAPTER 3. Mineral Rights [883.110 - 883.270] (Chapter 3 added by Stats. 1984, Ch. 240, Sec. 2.)

ARTICLE 2. Termination of Dormant Mineral Right [883.210 - 883.270] (Article 2 added by Stats. 1984, Ch. 240, Sec. 2.)

883.210. The owner of real property subject to a mineral right may bring an action to terminate the mineral right pursuant to this article if the mineral right is dormant.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

883.220. For the purpose of this article, a mineral right is dormant if all of the following conditions are satisfied for a period of 20 years immediately preceding commencement of the action to terminate the mineral right:

(a) There is no production of the minerals and no exploration, drilling, mining, development, or other operations that affect the minerals, whether on or below the surface of the real property or on other property, whether or not unitized or pooled with the real property.

(b) No separate property tax assessment is made of the mineral right or, if made, no taxes are paid on the assessment.

(c) No instrument creating, reserving, transferring, or otherwise evidencing the mineral right is recorded.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

883.230. (a) An owner of a mineral right may at any time record a notice of intent to preserve the mineral right.

(b) In lieu of the statement of the character of the interest claimed and the record location of the documents creating or evidencing the mineral rights claimed as otherwise required by paragraph (2) of subdivision (b) of Section 880.330 and in lieu of the legal description of the real property in which the interest is claimed as otherwise required by paragraph (3) of subdivision (b) of Section 880.330 and notwithstanding the provisions of Section 880.340 or any other provision in this title, a notice of intent to preserve a mineral right may refer generally and without specificity to any or all mineral rights claimed by claimant in any real property situated in the county.

(c) A mineral right is not dormant for the purpose of this article if:

(1) A notice of intent to preserve the mineral right is recorded within 20 years immediately preceding commencement of the action to terminate the mineral right.

(2) A notice of intent to preserve the mineral right is recorded pursuant to Section 883.250 after commencement of the action to terminate the mineral right.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

883.240. (a) An action to terminate a mineral right pursuant to this article shall be brought in the superior court of the county in which the real property subject to the mineral right is located.

(b) The action shall be brought in the same manner and shall be subject to the same procedure as an action to quiet title pursuant to Chapter 4 (commencing with Section 760.010) of Title 10 of Part 2 of the Code of Civil Procedure, to the extent applicable.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

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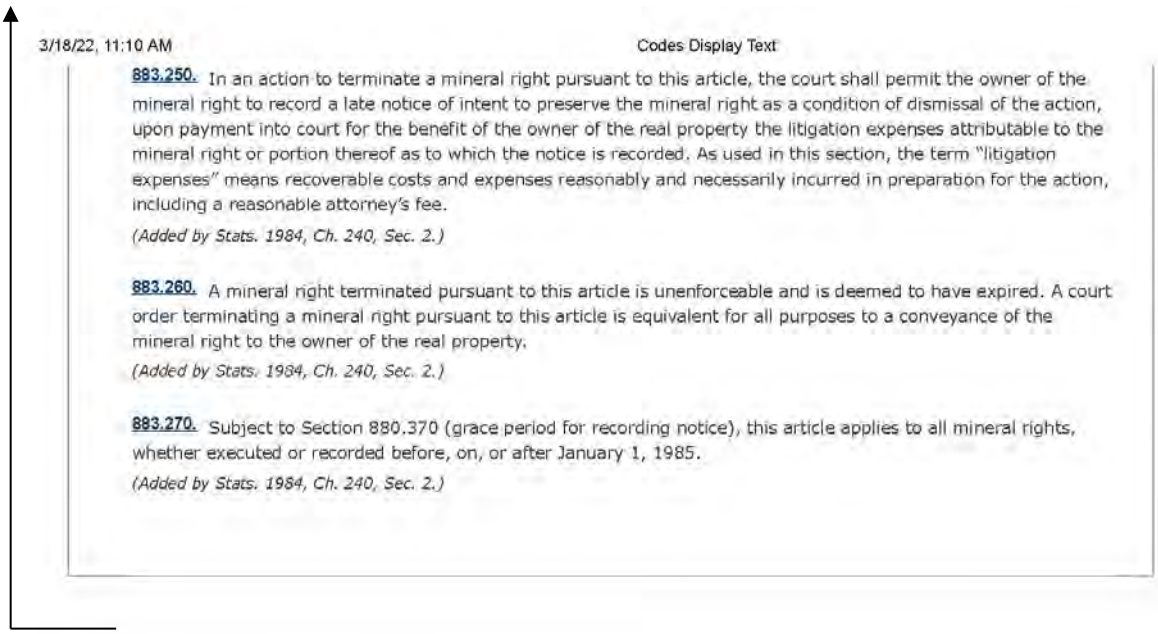
Ind 567-1



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883.250. In an action to terminate a mineral right pursuant to this article, the court shall permit the owner of the mineral right to record a late notice of intent to preserve the mineral right as a condition of dismissal of the action, upon payment into court for the benefit of the owner of the real property the litigation expenses attributable to the mineral right or portion thereof as to which the notice is recorded. As used in this section, the term "litigation expenses" means recoverable costs and expenses reasonably and necessarily incurred in preparation for the action, including a reasonable attorney's fee.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

883.260. A mineral right terminated pursuant to this article is unenforceable and is deemed to have expired. A court order terminating a mineral right pursuant to this article is equivalent for all purposes to a conveyance of the mineral right to the owner of the real property.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

883.270. Subject to Section 880.370 (grace period for recording notice), this article applies to all mineral rights, whether executed or recorded before, on, or after January 1, 1985.

(Added by Stats. 1984, Ch. 240, Sec. 2.)

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INDIVIDUAL LETTER 567: MARYANNE MURPHY

Response to Comment Ind 567-1

The comment is an attachment related to Individual Letter 566. Please see comments and responses to Individual Letter 566.

Individual Letter 568

Ind 568-1



3/18/22, 11:10 AM California Law - Civil Code - (pg. 102) Chapter 3. Mineral Rights

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California Laws - Civil Code (pg. 102)
Chapter 3. Mineral Rights

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California Laws | Civil Code
EFFECT OF THE 1872 CODES (23-23.6)
DIVISION 2. PROPERTY

pg. 102

882.030. Expiration of the lien of a mortgage, deed of trust, or other security interest pursuant to this chapter or any other statute renders the lien unenforceable by any means commenced or asserted thereafter and is equivalent for all purposes to a certificate of satisfaction, reconveyance, release, or other discharge of the security interest, and execution and recording of a certificate of satisfaction, reconveyance, release, or other discharge is not necessary to terminate or evidence the termination of the security interest. Nothing in this section precludes execution and recording at any time of a certificate of satisfaction, reconveyance, release, or other discharge. (2215)

882.040. (a) Subject to Section 880.370 (grace period for recording notice) and except as otherwise provided in this section, this chapter applies on the operative date to all mortgages, deeds of trust, and other instruments that create a security interest in real property to secure a debt or other obligation, whether executed or recorded before, on, or after the operative date. (2216)

(b) This chapter shall not cause the lien of a mortgage, deed of trust, or other security interest in real property to expire or become unenforceable before the passage of five years after the operative date of this chapter. (2217)

CHAPTER 3. MINERAL RIGHTS (2218) (Text)

Article 1. General Provisions (883.110-883.140) (2219) (Text)

883.110. As used in this chapter, "mineral right" means an interest in minerals, regardless of character, whether fugacious or nonfugacious, organic or inorganic, that is created by grant or reservation, regardless of form, whether a fee or lesser interest, mineral, royalty, or leasehold, absolute or fractional, corporeal or incorporeal, and includes express or implied appurtenant surface rights. (2220)

883.120. (a) This chapter does not apply to a mineral right reserved to the United States (whether in a patent, pursuant to federal law, or otherwise) or to an oil or gas lease, mining claim, or other mineral right of a person entitled pursuant thereto, to the extent provided in Section 880.240. (2221)

(b) This chapter does not apply to a mineral right of the state or a local public entity, or of any other person, to the extent provided in Section 880.240. (2222)

883.130. Nothing in this chapter limits or affects the common law governing abandonment of a mineral right or any other procedure provided by statute for clearing an abandoned mineral right from title to real property. (2223)

883.140. (a) As used in this section: (2224)

(1) "Lessee" includes an assignee or other successor in interest of the lessee. (2225)

(2) "Lessor" includes a successor in interest or heir or grantee of the lessor. (2226)

(b) If the term of a mineral right lease has expired or a mineral right lease has been abandoned by the lessee, the lessee shall, within 30 days after demand therefor by the lessor, execute, acknowledge, and deliver, or cause to be recorded, a deed quitclaiming all interest in and to the mineral rights covered by the lease. If the expiration or abandonment covers less than the entire interest of the lessee, the lessee shall execute, acknowledge, and deliver an appropriate instrument or notice of surrender or termination that covers the interest that has expired or been abandoned. (2227)

(c) If the lessee fails to comply with the requirements of this section, the lessee is liable for all damages sustained by the lessor as a result of the failure, including, but not limited to, court costs and reasonable attorney's fees in an action to clear title to the lessor's interest. The lessee shall also forfeit to the lessor the sum of one hundred fifty dollars ($150). (2228)

(d) Nothing in this section makes a quitclaim deed or other instrument or notice of surrender or termination, or a demand therefor, a condition precedent to an action to clear title to the lessor's interest. (2229)

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3/18/22, 11:10 AM California Law - Civil Code - (pg. 102) Chapter 3. Mineral Rights

Article 2. Termination of Dormant Mineral Right (883.210-883.270) (2230) (Text)

883.210. The owner of real property subject to a mineral right may bring an action to terminate the mineral right pursuant to this article if the mineral right is dormant. (2231)

883.220. For the purpose of this article, a mineral right is dormant if all of the following conditions are satisfied for a period of 20 years immediately preceding commencement of the action to terminate the mineral right: (2232)

(a) There is no production of the minerals and no exploration, drilling, mining, development, or other operations that affect the minerals, whether on or below the surface of the real property or on other property, whether or not unitized or pooled with the real property. (2233)

(b) No separate property tax assessment is made of the mineral right or, if made, no taxes are paid on the assessment. (2234)

(c) No instrument creating, reserving, transferring, or otherwise evidencing the mineral right is recorded. (2235)

883.230. (a) An owner of a mineral right may at any time record a notice of intent to preserve the mineral right. (2236)

(b) In lieu of the statement of the character of the interest claimed and the record location of the documents creating or evidencing the mineral rights claimed as otherwise required by paragraph (2) of subdivision (b) of Section 880.330 and in lieu of the legal description of the real property in which the interest is claimed as otherwise required by paragraph (3) of subdivision (b) of Section 880.330 and notwithstanding the provisions of Section 880.340 or any other provision in this title, a notice of intent to preserve a mineral right may refer generally and without specificity to any or all mineral rights claimed by claimant in any real property situated in the county. (2237)

(c) A mineral right is not dormant for the purpose of this article if: (2238)

(1) A notice of intent to preserve the mineral right is recorded within 20 years immediately preceding commencement of the action to terminate the mineral right. (2239)

(2) A notice of intent to preserve the mineral right is recorded pursuant to Section 883.250 after commencement of the action to terminate the mineral right. (2240)

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INDIVIDUAL LETTER 568: MARYANNE MURPHY

Response to Comment Ind 568-1

The comment is an attachment related to Individual Letter 566. Please see comments and responses to Individual Letter 566.

Individual Letter 569

From: maryannemurphyesq
To: BOS Public Comment
Cc: Heidi Hall; Matt Kelley
Subject: RiseGolds claim of making $122,000 per year.
Date: Tuesday, March 1, 2022 11:37:58 AM

Dist 1

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Recently, RiseGold sent out a mailing to the community claiming wages in the amount of $ 122,000 per year as Miner among other things.

We don't know who would make those wages and when.

The wage position it took is inflated. The information below is consistent with that of the Department of Labor Statistics.

Also, If you were to research " mining jobs" in Nevada where mining is in full force by Neumont and others you would find 400 jobs available for the entire State in mining in general.

So I don't know when or what jobs it is talking about creating thru Rise Gold and for how long as it is an exploratory company only. It's stated number of jobs available also appears to be inflated.

Anyway, here is the wage report that I mentioned. Located at comparably.com. Also check out information at bls.gov.

Ind 569-1

Salary Ranges for Gold Miners

The salaries of Gold Miners in the US range from $30,880 to $70,360 , with a median salary of $48,550 . The middle 60% of Gold Miners makes $48,550, with the top 80% making $70,360.

How much tax will you have to pay as a Gold Miner

For an individual filer in this tax bracket, you would have an estimated average federal tax in 2018 of 22%. After a federal tax rate of 22% has been taken out, Gold Miners could expect to have a take-home pay of $42,547/year, with each paycheck equaling approximately $1,773*.

** assuming bi-monthly pay period. Taxes estimated using tax rates for a single filer using 2018 federal and state tax tables. Metro-specific taxes are not considered in calculations. This data is intended to be an estimate, not prescriptive financial or tax advice.*



Quality of Life for Gold Miner

With a take-home pay of roughly $3,546/month, and the median 2BR apartment rental price of $2,506/mo**, a Gold Miner would pay 70.68% of their monthly take-home salary towards rent.

** *This rental cost was derived according to an online report at Apartment List*
**** *Average cost of living was acquired from Numbeo's Cost of Living Index*

INDIVIDUAL LETTER 569: MARYANNE MURPHY

Response to Comment Ind 569-1

This comment is in regard to wages and economic issues which are not required under CEQA to be analyzed in the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 570

From: Shannon Cotter
To: Idaho MMEIR
Subject: Mine Comments
Date: Thursday, February 24, 2022 3:58:08 PM

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Dear Mr. Kelly,

I'll keep this brief as I'm sure you are inundated with comments on the matter.

Ind 570-1

As a Grass Valley resident, living along Wolf Creek at 415 Mill Street, I have seen firsthand the rise and fall of the creek on our property. Additionally, our property has a drainage pipe that empties into Wolf Creek, or in the case of flooding, back floods our property. I understand that Wolf Creek is the proposed discharge route for the water that will be expelled from the mine. I'm concerned for our own property and that of our lower-lying Mill Street neighbors even more prone to flooding. But perhaps more concerning is the proposed drain on one of our most precious resources; water. I don't understand how this project can even be considered given our historic drought situation. Perhaps I have been misinformed, but the amount of water I hear will be used and discharged through Wolf Creek is astounding. Local residents, state residents, and even nationally, are being asked to conserve water due the drought, yet the mine will be using all that water?

Thank you for your time and consideration.
Matt & Shannon Cotter
(530)798-1192

INDIVIDUAL LETTER 570: MATT AND SHANNON COTTER

Response to Comment Ind 570-1

Please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 36 – Flows in South Fork Wolf Creek. Regarding groundwater and drought concerns please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 571

Dist 3

Ind 571-1

I [redacted] re-opening the Idaho-Maryl

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine remains over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $22,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO MINE!

RECEIVED
MAR 03 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) MATT GOTTSCHALK

Address 12645 LaBarr Meadows Rd. GV ZIP 95949

Phone 530-263-3107

Email Address matthewgottschalk@yahoo.com

INDIVIDUAL LETTER 571: MATT GOTTSCHALK

Response to Comment Ind 571-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Individual Letter 572

COUNTY OF NEVADA
COMMUNITY DEVELOPMENT AGENCY
950 MAIDU AVENUE, SUITE 170, NEVADA CITY, CA 95959-8617
(530) 265-1222 mynevadacounty.com

CDA Transmittal Letter

Drop off for (choose one department):

- ☒ Planning
- ☒ Environmental Health
- ☒ Public Works
- ☒ Agricultural Commissioner
- ☒ Code Compliance
- ☒ Cannabis Compliance WATER

Nevada County CDA
JAN 27 2022
Environmental Health

Date: JAN 25TH 2022

Ind 572-1

Contact name: MATTHEW COULTER

Permit number (if applicable): ? IDAHO MARYLAND MINE

Contact phone number (required): 530-277-2214

Contact email (required): NONE - 33% of Nev. Co. has NO INTERNET.

Description of documents and notes for department: SCH# 2020070378

THE 60 DAY COMMENT Period IS HALF OVER. IT WAS STARTED DURING A 18 DAY POWER OUTAGE, A STATE of EMERGENY, AND CLOSED LIBRARIES, THAT ONLY GOT SOME of the REQUIRED PUBLICLY AVAILABLE INFO After the COMMENT PERIOD STARTED. I request THE 60 DAY COMMENT period IS STARTED OVER.

INDIVIDUAL LETTER 572: MATTHEW COULTER

Response to Comment Ind 572-1

The DEIR was released for public review on January 4, 2022 for a 60-day public review period, which was extended to April 4, 2022 for a total public review period of 91 days.

Individual Letter 573

From: Maureen Cuthbert
To: Matt Kelley
Date: 4/1/2022
Subject: Rise Mine

RECEIVED
APR 07 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Dear Mr. Kelley,

I do not support the Rise mine and don't agree that it is good for Nevada County.

Ind 573-1

Rise Gold is a Canadian company with a questionable track record. Profits will end up in Canada with Nevada County taking an environmental hit.

Ind 573-2

Toxic waste generated by mine operations put residential communities at risk.

Ind 573-3

Air pollution due to dust from processing exacerbates existing Nevada County issues with air quality

Ind 573-4

Energy consumption will stress an already strained power grid.

Ind 573-5

And finally, most importantly, water usage required for their mining operations is completely irresponsible for consideration. Many wells are already going

dry in our communities. We do not have adequate water reserves to support existing residential and business communities. To allow massive and wasteful water usage to line the pockets of a Canadian company during severe drought conditions is just frivolous and reckless.

Please do what you can do to stop the Rise Idaho-Maryland mine.

Signed: Maureen Cuthbert
PO Box 549
19702 Mockingbird Way
Grass Valley, Ca 95712

Ind 573-6

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

RECEIVED
APR 07 2021
NEVADA COUNTY
PLANNING DEPARTMENT

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Maureen Cuthbert

Address PO Box 549 Chicago Park ZIP 95712

Phone 530-557-5365

Email Address maureencuthbert69@msn.com

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POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

INDIVIDUAL LETTER 573: MAUREEN CUTHBERT

Response to Comment Ind 573-1
The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 573-2
The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to toxic waste; without further specificity a detailed response is not possible. Hazards and hazardous materials associated with the project are addressed in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

Response to Comment Ind 573-3
The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to air pollution, specifically dust. Without further specificity a detailed response is not possible. Fugitive dust is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Response to Comment Ind 573-4
The comment does not specifically address the adequacy of the DEIR, but rather provides general energy-related concerns. Energy is addressed in Chapter 4.3 of the DEIR.

Response to Comment Ind 573-5
Regarding water concerns, please see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 573-6
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 574

Nevada County Planning Dept
Matt Kelley Senior Planner
Feb 5,2022

CC: Board of Supervisors:
Heidi Hall (Dist 1)
Ed Scofield (Dist 2)
Dan Miller (Dist 3)
Susan Hoek (Dist 4)
Richard Anderson (Dist 5)

CC: Cea NC. Org

To Whom it may concern:

We Oppose the RE-OPENING of the IDAHO MARYLAND MINE.

We have been residents of Grass Valley, living off Greenhorn Rd for the past 40 years. We vehemently oppose the proposal to open the Idaho Maryland Mine, that is being spearheaded by Ben Mossman of Rise Gold Co.

Ind 574-1 We believe that the re-opening of this mine, if granted would have devastating and catastrophic effects on this community.

The environmental affects it would have on our water, atmosphere and wildlife, through the emissions of chemicals in the mining process, would result in the contamination of ground water, surface water and soil. The atmosphere will have significant detrimentals effects on humans, animals and vegetation.

Ind 574-2 Should the mine be allowed to re open the endangered species cohabitating in this area, in particular, the yellow leg frog and the pacific ficher will become extinct .

Ind 574-3 Statistically mining kills and injures more workers than any industry, nearly 15,000 per year.

Ind 574-4 There are estimations of 47,000 abandon mines spread throughout every county in California, leaving the land decimated, contaminated, and abandoned.

Ind 574-5

Mining is currently responsible for 4-7% of Green house gases.
Consider the impact of radioactive gases, such as the radon that is emitted from the sludge in a tailing pond.

Other concerns , would be the possibility of sink holes and earthquakes.

Ind 574-6

"Mining accounts for the high number of human induced earthquakes worldwide. The removal of the earth can cause instability, leading to sudden collapses that trigger earthquakes".National Geographic 2017.

Furthermore , tectonic earthquakes can also collapse mine openings and tunnels with weak infrastructure.

Ind 574-7

Mining would impact and lower the water table causing the overlying rock and soil to collapse.
As is well known, sink holes are appearing more frequently each winter in Nevada County. Brunswick Rd, adjacent to the mine site, had a massive sink hole several years ago. There have been several others as well.

How is it that , Mr. Ben Mossman, CEO of Rise Gold Co. was able to acquire permits to potentially re-open this mining project, with.
NO investigation of his previous business history?

Records show that he abandoned the Hechate Strait Mining project on Bank Island in Canada and then filed Bankruptcy .
He has many violations and fines according to the Canadian Fisheries Environmental Management and Water Acts.

Ind 574-8

The investigation of that project shows again ,that he violated the environmental management act by dumping mine debris in the woods at the site. He was also sited for failure to report spills that affected the safety of fish and food.

Consequently , Ben Mossman is facing charges for damages caused. Mr Mossman has already shown his disdain and disregard for this community by not complying with the Timber Harvest Plans rules and regulations.
Mr Mossman also ignored riparian set back requirements for streams in Nevada County at his East Bennett project site.

Ind 574-9

Property values in the vicinity of East Bennett, Brunswick, Idaho Maryland and Greenhorn will decrease drastically.
If we should have a fire disaster such as the devastating fire that happened in Paradise Ca, a sufficient water supply will not be available .

Ind 574-10

DRAINS OUR WATER. "Water is one of the most precious resources we have, but Rise Gold plans pump out 3.6 million everyday for 6 months and another 1.2 for up to 80 years - flooding creeks, destroying habit, and putting 300 plus private wells at risk." CEAF

Ind 574-11

Traffic congestion , noise pollution and damage to roads (that will be continuous for 24 hours a day, 7 days a week, for a projected 80 years). Are crucial issues as well.

Ind 574-12

This proposal with all the toxic chemicals involved, the explosive materials being trucked shipped and stored, is simply an accident waiting to happen.

Rise Gold estimates 70 jobs will be provided for local residents.

The Gold profits leave this community , but the decimated quality of life will remain.

This community will gain nothing in return for the environmental destruction it will be left with.

This horrendous plan of reopening this mine with all the detrimental damage it will cause is Unthinkable and Unacceptable .

Ind 574-13

Please STOP the CARNAGE that the proposed re-opening of this mine will bring to this community.

Thank you for your attention to this very important matter.

Deborah Shriver

Maureen Miranda
Email: mozophoto1@yahoo.com

INDIVIDUAL LETTER 574: MAUREEN MIRANDA

Response to Comment Ind 574-1
The commenter believes the project would have adverse impacts to the community. The commenter lists a variety of environmental concerns but does not provide any specific comments. The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 574-2
The commenter asserts that project implementation would result in endangered species in the project area becoming extinct, including the foothill yellow-legged frog and the pacific fisher. Potential impacts to special status plant and wildlife species are evaluated in DEIR Chapter 4.4 (Biological Resources) and are each mitigated to a less than significant level. With regard to foothill yellow-legged frog, the commenter is referred to Master Response 38 - Foothill Yellow-Legged Frog and California Red-Legged Frog. The pacific fisher does not inhabit the project area.

Response to Comment Ind 574-3
The commenter states that mining accidents cause 15,000 injuries or deaths per year. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

Response to Comment Ind 574-4
The commenter states that California has approximately 47,000 abandoned mines, leaving land decimated and contaminated. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR.

Response to Comment Ind 574-5
The commenter states that the project will emit radioactive gases, such as radon, from the sludge in a tailings pond. The project does not include a tailings pond. The project's potential to emit greenhouse gas emissions is addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The impacts were found to be less than significant after mitigation.

Response to Comment Ind 574-6
The commenter states that the project would result in ground collapse or sinkholes. Ground collapse is discussed in Chapter 4.6 (Geology, Soils and Mineral Resources) beginning on DEIR page 4.6-44. As described in this section, "sink holes" occur within limestone environments and are caused by the dissolution of the stone itself creating a cave just below the ground surface. This type of ground collapse would not be expected in the project area which is granitic. Instead, mine-related collapse in the project area could occur where a vein outcrops on the surface and around mineshafts and other near surface mining features. A Geotechnical Assessment of Near Surface Mine Features conducted for the project recommended closure of several near surface features prior to development. Mitigation Measure 4.6-3(c) requires closure of these features under the direction of licensed geotechnical engineer and would reduce the potential for collapse to a less than significant level. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 574-7
Please see Response to Comment Ind 574-6.

Response to Comment Ind 574-8

This comment concerns the reputation and prior mining projects of the Project Applicant. The comment is noted for the decisionmakers but does not address a specific environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 574-9

The commenter states that the project would have adverse impacts on property values. CEQA does not require the EIR to consider economic impacts such as decreased property values. The commenter is referred to Master Response 2 - Social and Economic Impacts.

The commenter states that a sufficient water supply will not be available to fight a devastating fire if the project is implemented. The commenter provides no substantial evidence that the project will result in a lack of sufficient water supply for firefighting purposes. Water used for firefighting in the project area would be provided by Nevada Irrigation District which obtains its water supply from surface waters. The commenter is further referred to Master Response 6 - Wildfire Impacts.

Response to Comment Ind 574-10

The commenter states that dewatering the mine would have a number of adverse impacts to the community. Project impacts related to drainage and potential flooding are addressed under Impact 4.8-3, beginning on DEIR page 4.8-69. Project impacts on wildlife habitat are addressed under Impact 4.4-2, beginning on DEIR page 4.4-68. Project impacts on groundwater levels and recharge are addressed under Impact 4.8-2, beginning on DEIR page 54. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 36 – Flows in South Fork Wolf Creek.

Response to Comment Ind 574-11

The commenter states that the project will result in traffic and noise pollution but does not state how the DEIR is inadequate. Project impacts related to traffic congestion and noise pollution are addressed in DEIR Chapter 4.12 (Transportation) and Chapter 4.10 (Noise and Vibration), respectively. Mitigation Measure 4.12-6(a) requires the project's construction phase traffic control plan to include monitoring for roadbed damage and specify timing for completing needed repairs. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 574-12

The commenter states that the project is an accident waiting to happen because of the project's use of "explosive materials" and "toxic chemicals", but the commenter does not state why the DEIR is inadequate with regard to analyzing potential hazards. Further, the commenter's reference to "toxic chemicals" is unclear. For example, it is noted on page 3-25 of Chapter 3 that mercury or cyanide would not be used in gold mineral processing. Potential hazards associated with the use, transport, and storage of hazardous materials and explosives during project operation are addressed in detail in Chapter 4.7 (Hazards and Hazardous Materials).

Response to Comment Ind 574-13

The commenter states that the project's adverse impacts outweigh its benefits. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Comment 2 - Social and Economic Impacts.

Individual Letter 575

From: Megan Hart <meganelaynehart@gmail.com>
Sent: Monday, April 4, 2022 10:49 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: I Stand in Opposition to the Mine

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Ind 575-1

To whom it may concern,

My name is Megan Hart. I have lived in Nevada County for 20 years. This place has formed me as a person and I am better for it. I oppose this mine in every way. Living, for most of my years here, out near the Malakoff Diggins, dealing with water table issues and other environmental problems, it is astounding to me that in 2022, we have not learned from our mistakes. To even entertain the idea again is absurd. The money is not worth the long term effects this shortsighted and neglectful premise. Absolutely no mining. Period.

Megan Hart
Hart House Wine Company
@harthousewinecompany
530-559-1380

1

INDIVIDUAL LETTER 575: MEGAN HART

Response to Comment Ind 575-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 576

From: Mama Melanie
To: bdofsupervisors
Subject: Public comment
Date: Wednesday, January 19, 2022 9:30:32 AM

Unable to identify

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Board of Supervisors Across All Districts,

My name is Melanie Bright and it is irrelevant which district I'm in as everyone would be equally effected by the opening of the mine. There are no borders between districts where the terrible dust, noise and other pollutions would magically stop and disappear. We're all equally at risk.

People who have chosen to live in this area do so because it's healthier to live out here versus a city. We come for the clean air and quiet ambiance.

The company seeking to open the mine has a history of financial failure and a history of not putting communities first. This company has a pocketbook in mind, not the welfare of others. It has already been proven. So what will you chose? Fatten the pocketbook of the mining company and risk all of our resources in doing so? — or protect our resources and the people?

Lastly, you may think this is a good idea, but what if you're wrong? What if you have doomed an entire county to horrific air quality, water loss and pollution, noise pollution, and more? Would you be able to sleep at night knowing you caused tens of thousands of people to develop serious health issues? Could you live with yourself knowing people died because of the air pollution you agreed to? For example, my son is eight years old and had two open heart surgeries at birth. Air pollution could literally cut his life span down. We moved here in order to HELP him and give him the longest chance at life. Could you vote yes knowing there are hundreds or thousands of other people at risk already? Is the mine opening more important than human life?

Could you look into the faces of the families of those who lost someone to lung cancer? Are you okay for everyone to lose value on their homes? Are you okay knowing your choice to agree drove people out of Nevada County?

Ind 576-1

If you agree to open the mine, you have not voted for the wellbeing of those who elected you to protect them. You will have failed the people for your own gain— whatever that may be. Maybe you want to look productive or maybe your ego likes to see others beg for you to spare us. Not all gain is financial.

You have seen the evidence of how destructive this choice would be and you cannot unsee it.

Thank you,
A concerned citizen

Sent from my iPhone

INDIVIDUAL LETTER 576: MELANIE BRIGHT

Response to Comment Ind 576-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For the generally referenced concerns regarding air pollution, water loss, noise, and traffic, please see the analyses of these topics in Chapter 4.3, Air Quality, Greenhouse Gas Emissions and Energy; Chapter 4.8, Hydrology and Water Quality; Chapter 4.10, Noise and Vibration, and Chapter 4.12, Transportation. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 577

From: Menkin Nelson <menkin@highpocketsllc.com>
Sent: Monday, April 4, 2022 4:45 PM
To: Idaho MMEIR; Matt Kelley
Subject: Letter Regarding the Idaho Maryland Mine DEIR
Attachments: MineDEIR_Letter.pdf

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Hey Matt and the Planning Commission,

Attached is my written response to the DEIR for the Idaho Maryland Mine Project.
Like almost everyone I've encountered in the County I am opposed to the re-opening of such an enormous industrial project with unknown consequences.

Ind 577-1 Although not a part of my official statement (attached) I was privy to the Bear Yuba Land Trust making an offer to Rise Gold to purchase the Brunswick Site property listed in the Proposal. That alternative is the kind of development our County should encourage, our residents desire and our real estate agents would do backflips for :)

Thank you all in advance for considering my statements, the time and energy you are putting into reviewing and understanding our concerns.

Sincerely,

Menkin Nelson
(530) 955 -3129



April 4, 2022

To: Attn: Matt Kelley
Nevada County Planning Commission

Regarding: PLN19-0176; CUP19-0014; RZN19-0002; MGT19-0039; MGT19-0040; VAR19-0003; EIR19-0001; MGT20-0009; MGT20-0010; MGT20-0011; MGT20-0012; MGT20-0013; LLA20-0006; AAM21-00002
Proposal to Re-Open the Idaho Maryland Mine Underground Mining and the Associated Draft Environmental Impact Review SCH# 2020070378

Prepared By: Menkin Nelson

Ind 577-2

Proposed Project Description:
The proposed project's surface components would be located on approximately 175.64 acres consisting of the Brunswick Industrial Site, the Centennial Industrial Site, and a 0.30-acre portion of East Bennett Road for off-site improvements associated with a potable water pipeline easement. The project would also involve underground mining within an approximately 2,585- acre mineral rights boundary owned by the applicant. The potable water pipeline easement would be located along East Bennett Road, and would be contained within the existing right-of-way. Both the Brunswick Industrial Site and the Centennial Industrial Site are located within unincorporated western Nevada County and are owned by Rise Grass Valley. The approximately 119-acre Brunswick Industrial Site is located southwest of the intersection of East Bennett and Brunswick Roads, and is comprised of Assessor's Parcel Numbers (APNs): 006-441-003 (12503 Brunswick Road), 006-441-004 (12625 Brunswick Road), 006-441-005 (12791 Brunswick Road), 006-441-034 (12381 Brunswick Road), 009-630-037 (12369 East Bennett Road), and 009-630-039 (12301 Millsite Road). The approximately 56.41-acre Centennial Industrial Site is located southwest of the intersection of Idaho Maryland Road and Centennial Drive and is comprised of APNs: 009-550-032, 009-550-037 (10344 Centennial Drive), 009-550-038 (10350 Centennial Drive), 009-550-039 (10344 Centennial Drive), 009-550-040, and 009-560-036 (10350 Centennial Drive).

The much larger mineral rights boundary encompasses approximately 2,585 acres and generally contains properties surrounding the Brunswick and Centennial Industrial Sites, with the majority of additional land area located north of the Brunswick Industrial Site and east of the Centennial Industrial Site. This generally includes most of the Nevada County Airport and surrounding Air Park, as well as property along both sides of Brunswick Road, Greenhorn Road, and Idaho Maryland Road.

The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold

mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. Following completion of mining and processing activities, the project sites would be reclaimed to open space and land suitable for future development of industrial uses. Generally, the proposed project would include the following components:

- Dewatering the existing underground mine workings;
- Underground mining at a depth of 500 feet or more in areas underlying the mineral rights
- properties;
- Construction and operation of aboveground processing and water treatment facilities at
- the Brunswick Industrial Site;
- Engineered fill placement for potential future industrial pad development at the Centennial
- and the Brunswick Industrial Sites;
- Installation of a potable water pipeline for residential potable water supply; and
- Reclamation of the project sites in accordance with a proposed Reclamation Plan.

The majority of the aboveground facilities, access to the underground mining, and a portion of the engineered fill would be located on the Brunswick Industrial Site. The aboveground facilities would be located within a 29-acre industrial area that would include but not be limited to, a headframe building around the existing concrete silo used to hoist rock from the Brunswick shaft; covered conveyor system used to transport a) barren rock to a truck hauling area within an adjacent enclosed building, and b) gold concentrate to the processing plant; a processing plant to grind rock and recover gold minerals through various processes; and other appurtenant structures such as office and warehouse space. An above-ground water treatment plant would also be built at the Brunswick Industrial Site to treat groundwater associated within initial and ongoing ("maintenance") dewatering of the underground mine workings. A new aboveground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek. The pipe and discharge point are located entirely within the property boundaries.

Engineered fill generated by the proposed mining activities would be placed on approximately 31 acres of the Brunswick Industrial Site to create a level pad of approximately 21 acres for potential future industrial use. In total, up to approximately 60 acres of the 119-acre site could be subject to surface disturbance and/or development for the aboveground facilities and fill placement. The remaining 59 acres would remain undeveloped and would not be subject to surface disturbance or infrastructure improvements.

Engineered fill would also be placed on the Centennial Industrial Site, provided that the separate DTSC cleanup project has been approved and completed on the Centennial Industrial Site. In that case, engineered fill would be transported by truck from the

Brunswick Industrial Site and placed on approximately 44 acres of the Centennial Industrial Site to create approximately 37 acres for potential future industrial use. The remaining approximately 12 acres would remain as a private driveway for site access and open space. The open space area would include Wolf Creek, a 100-foot setback for riparian area on Wolf Creek, and an undisturbed area providing protection for identified special-status plant species.
After full placement of fill at the Centennial and Brunswick Industrial Sites to the pad design elevations, the need for hauling of engineered fill would continue due to ongoing mining over the Use Permit term of 80 years, and thus, hauling would shift entirely to local and regional markets for sale as construction aggregate and fill. If the separate DTSC cleanup project is not approved by DTSC and completed within the term of the Idaho Maryland Mine Project use permit, engineered fill would be placed on the Brunswick site, but not the Centennial site, and the remainder would be hauled to local and regional markets.

A buried potable water pipeline would be constructed as part of the proposed project to provide water to residences along a portion of East Bennett Road. The pipeline would extend an existing NID potable water pipeline along an approximately 1.25-mile segment of East Bennett Road to provide potable water service to residential properties currently on wells that may be affected by the project's dewatering of the mine. NID would be the water supplier for the potable water service.

Statement for consideration:
Thank you for taking the time to read my response to the Draft Environmental Impact Review (DEIR) prepared by Raney Planning and Management Inc, 2021. I am regularly in the Planning Department trying to get new development and projects approved because I support development and expansion that benefits our local community and the economy. I do not believe that the re-opening of the Idaho Maryland Mine qualifies as a beneficial project to our community. Based on the DEIR and associated documents; it's frustrating that this project still has to be considered by our environmentally aware and community minded staff, but understand that you are required to do your due diligence prior to denial of such a project and hope to assist in shedding a light on several areas that seem insufficiently addressed by the DEIR.

Ind 577-3

First, I would like to formally request that another *Draft* Environmental Impact Review be prepared and be re-circulated through the public as the existing version is grossly negligent and jumping directly to a Final Environmental Impact Review does not allow an opportunity for the community to verify that the great number of concerns expressed regarding the released DEIR during the March 24th 2022 Planning Commission hearing, as well as in writing during the hearing period, are being addressed to an appropriate and satisfactory degree.

The Initial DEIR (Raney Planning and Management Inc 2021) section 1.1 states '*As provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to* ***avoid or minimize environmental damage where feasible****. The public agency has an obligation to balance a variety of public objectives, including economic,*

environmental, and social issues.' In consideration of this guideline, we'd like any conclusions by the department to be reserved until the Economic Impact Review has also completed both the Draft public circulation with hearing period and adjusted to a Final Economic Impact Review in addition to a much more thorough Draft Environmental Impact Review.

Section 1.3 – Approach to Centennial Site Baseline

Ind 577-4

The Initial DEIR (Raney Planning and Management Inc 2021) states '*The CEQA Guidelines, and the courts, have noted that in some situations, the physical conditions existing at the time the environmental analysis commences (e.g., for an EIR, the Guidelines describe this as publication of the Notice of Preparation [NOP]) do not always provide the most accurate and understandable picture practically possible of the project's likely impacts. For example, Guidelines Section 15125(a)(1) states that, "…where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."*

The terminology of the CEQA guidelines specifically states that in order to provide the most accurate picture possible it either needs to be based on already existing conditions or must be supported with substantial evidence. Therefore, we can safely conclude that either the Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site be considered within the EIR or should be fully completed with written project approval, including final soil samples and environmental evaluations, from the DTSC prior to the DEIR removing it from consideration.

Section 1.4 Independent Utility

Ind 577-5

The Initial DEIR (Raney Planning and Management Inc 2021) states '*The utility and purpose of the Centennial Clean-Up Project is to ensure timely and efficient cleanup of the Centennial Industrial Site due to existing site conditions, and is required under both California and federal environmental regulations—not because it would benefit the Idaho-Maryland Mine Project. Similar to the holding of Banning Ranch, the Centennial Clean-Up Project would happen whether or not an underground mine is approved by Nevada County for the Brunswick Industrial Site. As stated above, the Centennial Industrial Site was identified by the EPA for cleanup purposes long before Rise purchased either the Centennial or Brunswick properties, and long before the Idaho-Maryland Mine Project was proposed. Consequently, under the holding in Banning Ranch, the Centennial Clean-Up Project should be analyzed separately from the Idaho-Maryland Project under CEQA.*'

The statement 'not because it would benefit the Idaho-Maryland Mine Project.' is completely outlandish considering that Rise Grass Valley clearly states their intention to utilize the Centennial site and purchased both the Centennial site and the Brunswick site in conjunction. They claim that there is 'sufficient flexibility in the project design such that waste rock could first be deposited at the Brunswick Industrial Site.' If the

Centennial cleanup is not considered within the DEIR, then the entire DEIR should ONLY consider waste rock being deposited at the Brunswick Industrial site or an alternative. Additionally, Rise Grass Valley voluntarily entered into the Remediation Action Plan (RAP) independently of the Idaho Maryland Mine project so the company should be moving forward with that agreement regardless of the Idaho Maryland projects' progress and their lack of efforts towards that commitment shouldn't be rewarded by overlooking it.

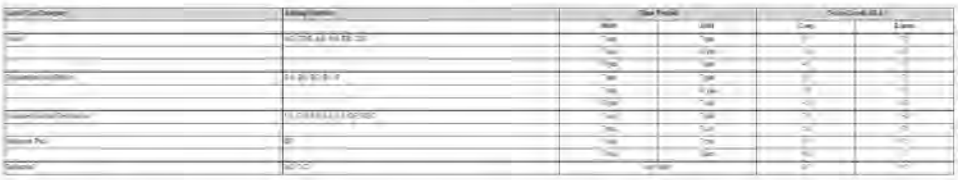
Section 4.10 Noise and Vibration
The Nevada County noise ordinance states dB readings at project property lines must adhere to the limitations set forth in the Nevada County Ordinance No. 1853, adopted by the Board of Supervisors on January 18, 1994. Digging into the DEIR's continued short comings, on page 4.10-4 under Existing Sensitive Receptors it states '*For the purposes of this analysis, 30 receptors were selected as representative of the nearest potentially affected receptors to the project sites (see Figure 4.10-2). The receptors consist of the following locations:*

- *17 residences surrounding the Brunswick Industrial Site.*
- *3 residences near the Centennial Industrial Site.*
- *1 residence along Whispering Pines Lane between Brunswick Road and Centennial Drive.*
- *5 residences along Brunswick Road, north of East Bennett Road.*
- *4 residences along East Bennett Road.'*

Ind 577-6

Please notice that NONE of these receptors are at the adjacent property line, in fact ALL of them are some great distance further, some multiple parcels away even. Although several of these off-site receptors, particularly where truck traffic noise is considered, are valid noise monitoring locations there should additionally be sounds tests taken at all parcel boundaries in the revised Draft Environmental Impact Review.

Pursuant to Nevada County Land use and Development Code (NCLUDC), Section L-II 4.1.7 Noise, A. defines its purpose '***Purpose***- *The purpose of these regulations is to ensure that future development* ***minimizes unnecessary and annoying noise****, by establishing maximum noise levels and standards for evaluating potential noise impacts.*'



(NCLUDC), Section L-II 4.1.7. D. 5. sates '*The above standards shall be measured only on property containing a noise sensitive land use, including residences, schools,*

hospitals, nursing homes, churches, and libraries, and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at ***the boundary of a recorded noise easement*** *or as determined in a recorded letter of agreement between all affected property owners and approved by the County.*' This clearly specifies either on the land itself or its boundary.

Further down Section L-II 4.1.7. D.7. states '*Because of the unique nature of sound, the County reserves the right to provide for a* ***more restrictive standard*** *than shown in the Exterior Noise Limits Table. The maximum adjustment shall be limited to be not less than the current ambient noise level and shall not exceed the standards of this Section. Imposition of a noise level adjustment shall only be considered if one or more of the following conditions are found to exist:*

a. *Unique characteristics of the noise source:*

Ind 577-7

1) The noise contains a very high or low frequency, is of a pure tone (a steady, audible tone such as a whine, screech, or hum), or contains a wide divergence in frequency spectra between the noise source and ambient level;

2) The noise is impulsive in nature (such as hammering, riveting, or explosions), or contains music or speech;

3) The noise source is of a long duration, defined as a cumulative period of more than thirty minutes in any hour.'

Given the projects proposal of noise sources of a long duration (more than 30 minutes in any hour) we would like to request the County exercise their right to provide for a more restrictive standard than shown in the Exterior Noise Limits Table.

Ind 577-8

The Occupational Safety and Health Act (OSHA) has declared excessive noise levels a recognized hazards to safety and health, influencing NCLUDC Section L-II 4.1.7.D.4. enough to clearly state '*Where 2 different zoning districts abut, the standard applicable to the lower, or more restrictive, district plus 5 dBA shall apply.*' Unfortunately, our applicants seem unaware of the NCLUDC when the DEIR Section 4.6 Geology, Soils and Mineral Resources (page 4.6-23) Policy 17.24 states '***Regardless of the General Plan designation****, subsurface mining shall be conditionally permitted throughout the County.*' The DEIR neglects to clarify the depths of any of this subsurface mining and the mitigation measures to assure that the minimum noise levels during night time hours under 900 privately owned parcels, including many residences, shall be adhered to, particularly as they pertain to the zoning of the parcel being effected. Their abrasive statement 'regardless of general plan designation,' implies that Rise Grass Valley has no intention of adhering to the sound standards adopted by the County's Board of Supervisors while conducting the anticipated '*257 detonators per day to facilitate Rise's mining operations at the Brunswick Industrial Site*' or as stated later '*on a single delay, for a total of 26.6 lbs of explosive being detonated*'.

Ind 577-9

It's also worth noting that according to table 14.10-1 (page 4.10-8) the ambient noise levels were tested greater than 3 years ago, some over 5 years ago. A sound analysis utilizing data from an irrelevant time period is not applicable to science and the entire sound analysis should have to be re-created using verifiable, current and accurate data.

Ind 577-10

DEIR - Missing Sections and Items

The Draft EIR is missing any effects of this project as they pertain to the ever-intensifying fire season, along with many other absences. Please see some of those concerns below.

Explosives vs. Fire Risk

Nowhere in the DEIR is there data referencing the transportation of explosives against vehicle crash statistics, specifically along hwy 174. It is imperative that we apply some basic math and statistics before agreeing to send a bi-weekly (sometimes weekly) deliveries of the 28 tons of explosive material down a roads pass near residences and through highly flammable natural vegetation. The ignition force of 28 tons of explosive (ammonia nitrate fuel oil [ANFO] and packaged or bulk emulsion explosives) should be considered with calculations about the distance of potential flame and explosive force with an overlay of the vegetation, homes and business along the transportation route. Additionally, these calculations should be considered at the unloading and loading areas in case of an accidental ignition. This review should be overseen by CalFire, Pearldale Chicago Park, Ophir and Nevada County Consolidated Fire Districts as the leading experts in what would be a realistic expectation of fire expansion and the resources required to control it. In a county where we do not allow generator use, unless as a backup system that has been tied into a fully engineered and permitted power grid, we clearly understand fire risk and the rapidity of ignition in a dry climate. To not even consider the resources that would be required to quickly neutralize the effects of an accidental car crash carrying 28 tons of explosives is grossly negligent. With expected bi-weekly transport for an 80 year period we would need to consider over 2000 truck loads. There is also a continued drought and the predicted decline in watershed should be considered in all calculations. In the case of an explosive load, even a small portion of the load igniting will ignite the remaining load for the full qty being transported to cause the full devastating effects of the maximum capacity.

Ind 577-11

Not considering the effects or mentioning the possibility of an explosion within the DEIR can only be interpreted as an attempt to shield the subject from the reviewing committee, knowing the risk associated with the proposal is well beyond any reasonable level. When the DEIR states '*Additionally, the explosives supplier will have a sufficient insurance policy*' (Chapter 3.0 Project Description, Page 3-28, Other Truck Transport, Explosives) it should further be clarified that the aforementioned insurance policy is considered sufficient to rebuild the homes and businesses that are directly threatened by this proposal and compensate the local fire jurisdictions for resources pulled from other locations due undue risk on a continuously arduous fire season. And lastly, we can all agree that no insurance policy is ever sufficient to cover the loss of life or loved ones.

Ind 577-12 Given the public and official reaction to one 'possible stick of old dynamite' that shut down Nevada City's downtown area to traffic and businesses on March 30th, we Nevada County Residents take the threat of explosives slightly more seriously than Rise Gold does.

Ind 577-13 Section 4.11 Public Services and Utilities makes a brief mention of the staffing requirements of local Fire Districts, but there is no mitigation suggested for additional staffing or equipment that this project warrants with the power usage of approximately 6000 homes, transportation of explosives and assorted industrial buildings and equipment.

Ind 577-14 Explosive vs. Legal Shipping Route
See Reference Link at Bottom of Letter
According to the Highway Patrol Handbook 84.3, Section 3. CALIFORNIA VEHICLE CODE, SECTION 31602. LICENSE: ROUTES TO BE USED (d) '*It is a* ***misdemeanor*** *for the owner, or authorized agent of the owner, of any vehicle transporting explosives to drive, or to permit the driving of the vehicle, or for the driver to drive such vehicle, upon any public highway ,* ***not designated in regulations adopted by the Department of the California Highway Patrol as a route for the transportation of explosives****, unless the use of the highway is required to permit delivery of, or the loading of, explosives at a point not on a highway designated as a route for the transportation of explosives, or unless the use of the highway is required to permit the vehicle to proceed to, and return from, a point designated as an inspection stop pursuant to this division.*' However, if you look at map 6 (including the greater Grass Valley area) Hwy 174, access to the Brunswick site, is not even listed as a route for transportation explosives. Overlooking this detail is once again, gross negligence.

Ind 577-15 Collapsed Tunnels and Sink Holes
The CEO and sole member of Rise Grass Valley, Benjamin Mossman, proudly proclaimed in an interview on 'Nevada County Now, August 2020' that all the '*all the land is privately owned, so the resources belong to Rise Gold.*' Unfortunately, Ben is correct about the mineral rights included within 2600+acres, however the DEIR does not address how this could affect the 900 privately owned parcels above the mineral rights and interlaced tunnels that not only weave through private neighborhoods and crucial water reserves, but also under a portion of Grass Valley's city limits including the Grass Valley Airport.

Searching no further than the Wolf Creek Park walking trail, located in Grass Valley, you can see the devastating effects of a massive sink hole behind the Les Schwab and Tripp's Auto Body. The DEIR does not address the depths at which mineral rights are available, therefor there is no valid evidence that underground blasts wouldn't affect assorted private parcels from foundation damage to sound annoyance.

Ind 577-16 Additionally, there is no geotechnical underground data with regards to the subsurface tunnels under the airport. Nor are there any mitigation measures to offsite fire

protection, should an unfortunate tunnel collapse damage the Grass Valley Airport runway that doubles as the Grass Valley Interagency Air Attack Base for local and statewide, fire spotting and suppression aircrafts.

Ind 577-17

There is no doubt that Nevada County is filled with known faults, and even less doubt that California is a seismic region. Rise Grass Valley is proposing that there is no risk to blast explosives underground within 200 feet of a known fault.

Ind 577-18

Section 4.9 Land Use and Population and Housing, on page 4.9-22 states '*The project also includes a request to amend the Final Map for the formerly proposed Bet Acres Subdivision recorded in February 1987, in Book 7 of Subdivision Maps at Page 75, to remove the "200' Building Setback from Fault", as shown on Sheet 4 of Final Map #85. Sheet 4 of the Final Map includes a portion of the Brunswick Industrial Site. The Final Map shows the location of where Anderson Geotechnical Consultants had believed a fault to be, based on their previous site investigations, and depicted it as a straight dashed line with two parallel lines located 200 feet either side, presumably showing Anderson's suggested setback distances for building construction. Substantial evidence is provided in the Geology, Soils, and Mineral Resources of this EIR (Chapter 4.6, see Impact 4.6-1), indicating that the area is not seismically active, and thus, building setbacks are not required. Sec. L-IV 2.18 of the County Subdivision Ordinance allows for corrections and amendments to an approved tentative map, recorded final map or a parcel map, if the amendments have a cumulatively minor effect on the subdivision and its impacts. The proposed changes to the map or to conditions of approval must be considered at a public hearing by the original approval body.*'
There are two very important take aways from the DEIR's own wording. The first and possibly most crucial is their statement '*Substantial evidence is provided in the Geology, Soils, and Mineral Resources of this EIR (Chapter 4.6, see Impact 4.6-1), indicating that the area is not seismically active*' is wildly unpredictable and probably erroneous. Perhaps it's not an active fault today, however a few blasts of dynamite could quite easily change that. If we start ignoring setbacks as they pertain to fault lines, then where and with who do we draw the line. We already have hundreds of existing sink holes within Nevada County from fault shifts and collapsed mining tunnels. There should be additional data in regard to the effects of explosions near known faults and their consequences included within the DEIR.
The second take away is the '*The proposed changes to the map or to conditions of approval must be considered at a public hearing by the original approval body,' Which signifies that the rezoning and map amendments must be considered at a public hearing, entirely separate to the Proposal to reopen the Idaho Maryland Mine.*

Ind 577-19

<u>Water Usage vs. Discharge</u>
Rise Gold claims the settling ponds are sufficient for the qty of water discharged daily, however the math is non-complete. Continuously filling and draining bodies of water do not 'settle'. The DEIR should include calculations that show there is enough time to elapse to allow for the weekly output to settle prior to adding or circulating additional water.

The maximum daily water output should be conjoined with the 100 yr. flood calculations the length of the discharge route. Additionally it should be overlayed with the FEMA flood map from Wolf Creek all the way to the Bay to confirm that should a 100 year flood happen in conjunction with a maximum rate of discharge Wolf Creek, or the continued bodies of water, won't adversely affect surrounding areas.

Economic Impact Review

This project is undeniably incomplete without an Economic Impact Review. Although we can see that Rise Gold has already spent over $634,000 in permit fees directly paid to Nevada County it is hard to see how the economic influx could continue after operation begins. With the bulk of taxes for gold mining going to the state and federal agencies I fear Nevada County will be left in the dust, with additional housing needs and no real new jobs for existing residents.

Currently employment is at a record high and a quick walk around Nevada County displays more 'Help Wanted' signs than one could count. The Economic Impact Review should include the qualification requirements for the available positions as they relate to the unemployed in Nevada County. Almost assuredly they will not align.

Ind 577-20

Additional calculations should include the approximate cost of water per gallon ($2 per gallon at your local supermarket) vs. the amount of 'potable' water being discharged and flushed down Wolf Creek. And the average cost of purchasing land per SF on an average throughout the 2600+ acres of mineral rights vs. the 'high yielding' 27 grams of gold per metric ton of earth. 27 grams of gold is slightly less than an ounce, which today retails for approximately $2,000 once minted. The immediate $2,000 value seen would have to deduct the costs of mining, taxes, minting and retail to get the actual value as it relates to blowing up a section of earth that is larger than my front yard. I'd rather have my yard, as would my realtor.

Water discharged from Rise Grass Valley is stated to be 'potable' however there is also proposed water usage at the mining sites. The water discharged should go into a reservoir system to not only supply the mining operations but also to have a large reserve for fire suppression, potential city usage in an emergency, and available to all residents who are at risk of losing their well for no additional cost. If an additional cost is proposed for water rights to the residents the cost of water purification and distribution should additionally be considered within the Economic Impact Review.

Please Consider

Ind 577-21

General Plan Policy 17.14 states that '*existing development - commercial, residential, and community - as well as undeveloped private lands, shall be protected from adverse environmental effects caused by mining through enforced use permit conditions and mitigations measures, or denial of the projects.*'
I would like to emphasize that last option, denial of the projects.

In 2018 permit CC18-0025 shows us that during the ownership of Rise Gold there was a code compliance violation 12301 Mill Site Rd in Grass Valley. A parcel that buts up

against Wolf Creek and numerous active businesses within the Grass Valley city limits. There were several missteps from Rise Grass Valley during that time, the negligence regarding 100' setback around streams and waterways, namely the 'protected' Wolf Creek and a timber harvest without a permit. These are two of the most standardized and basic requirements across the county and include oversight by several statewide governing agencies, namely CalFire, the CDFW and the Waterboard. Please consider those code violations as an indication of how little this company understands or respects the local ordinances, regulations, and community. Or perhaps the unthinkable is true and Ben was right, he, the sole member of Rise Gold, does indeed own all the resources throughout 900 private Nevada County parcels, along Wolf Creek and under our only Fire Base Airport?

I thank the Matt Kelley, Nevada County Planners and the Planning Commission for taking the time to consider my letter.

Sincerely,

Menkin Nelson

High Pockets LLC

PO Box 173
Nevada City, CA 95959
(530) 955-3129

References

1 – Highway Patrol Handbook 84.3 link below

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INDIVIDUAL LETTER 577: MENKIN NELSON

Response to Comment Ind 577-1
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 577-2
The commenter reproduces portions of the Project Description. No response is required.

Response to Comment 577-3
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the DEIR is grossly negligent but provides no further information. Therefore, no response is necessary. The commenter requests that the DEIR be revised and recirculated. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

Response to Comment Ind 577-4
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 577-5
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 577-6
The commenter states that no sensitive receptors for the noise analysis are adjacent to the property boundary of the project sites. The commenter states there should be sound tests taken at all parcel boundaries for the analysis of the DEIR, and that pursuant to Section L-II 4.1.7 of the Nevada County Land Use and Development code, noise levels and standards should be determined either on the land itself or its boundary.

Please see Response to Comment Ind 617-5.

Response to Comment Ind 577-7
The commenter's request has already been considered in the DEIR. As discussed on page 4.10-16, as described in Footnote B of Table 4.10-4, a +5 dB adjustment to the noise standards would be applicable at all residential receptors due to the differing zoning districts. However, the +5 dB adjustment would be negated by a -5 dB adjustment due to the project noise sources occurring for long durations. As a result, the only adjustment applied to the Table 4.10-4 standards were based on ambient conditions.

Response to Comment Ind 577-8
No blasting noise would propagate through the solid rock between the underground mine to properties on surface. Please see Master Response 7 - Location of Future Mining Areas. The noise from underground blasting, at the shaft headframe, has been analyzed in the DEIR and was found to be less than significant (see page 4.10-44 of the DEIR).

Response to Comment Ind 577-9
Please see Response to Comment Ind 617-4.

Response to Comment Ind 577-10

The project does not propose any trucking along Highway 174. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

The commenter speculates that trucks carrying explosives may explode along Highway 174. However, there is no evidence of a significant risk of this occurring. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 577-11

Mitigation measure 4-7-1(c) requires the mine operator to ensure, through the enforcement of contractual obligations, that all contractors or suppliers transport explosives in a manner consistent with all applicable regulations and guidelines. Proof of the agreement between the operator and contractor or supplier transporting explosives shall be provided to the Nevada County Planning Department before transporting explosives to the site. Insurance for explosives transport is regulated by 49 CFR 387 as shown in Table 4.7-2 of the DEIR. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill. As stated in Response to Comment Ind 577-10, explosion of trucks, which is highly regulated by the government, is speculative and not required to be analyzed in an EIR.

Response to Comment Ind 577-12

Comment noted.

Response to Comment Ind 577-13

As discussed on page 4.11-19 of the DEIR, consistent with Appendix G of the CEQA Guidelines, determination of significant impacts for public services is based on whether the proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services.

The approach to analyzing a project's impacts on fire protection services, pursuant to CEQA, is often misunderstood. Industry practice has often focused on any type of demand upon a fire department or district that may be generated by a project, such as an increased need for staffing, or the need for new firefighting equipment. These are important considerations, but they are not CEQA considerations per se. This important point can be seen by a careful reading of the language in Appendix G of the CEQA Guidelines (Section XV. Public Services). As discussed above, the language focuses on whether a project's increase in demand is such that a fire service provider would need to build new or expand existing governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The reason for this focus is that building new facilities, or expanding existing facilities, requires construction activities and disturbance of the physical environment, which is the focus of CEQA.

According to CEQA Guidelines Section 15002(g), a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. "Environment" means the physical conditions that exist within the area



which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance (PRC Section 21060.5).

The courts have affirmed this understanding. In the case *City of Hayward v. Board of Trustees of the California State University,* the First District Court of Appeal affirmed that the focus of CEQA analysis should be limited to physical environmental impacts related to a project.[2] The court held that, "The need for additional fire protection services is not an *environmental* impact that CEQA requires a Project Proponent to mitigate."

The commenter does not explain how the project's power consumption or transportation of explosives would result in public services demand that would necessitate the need for new or physically altered governmental facilities, thus potentially causing an environmental impact.

Response to Comment Ind 577-14

The project does not propose any trucking along Highway 174. Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 577-15

Please see Chapter 4.6 of the DEIR and Master Response 29 – Near Surface Workings, and Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 577-16

Please see Chapter 4.6 of the DEIR and Master Response 29 – Near Surface Workings.

Response to Comment Ind 577-17

Please see Chapter 4.6 of the DEIR regarding seismicity of the project area.

The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. Please see NV5 Memo attached to the Final EIR as Appendix P.

Response to Comment Ind 577-18

As discussed in Section 4.5-1 of the DEIR, based upon this substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85.

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. ECM, the County's independent peer review consultant for this project, concurred with NV5's professional opinion, after reviewing the data.

[2] First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. (November 30, 2015) 242 Cal.App.4th 833.

While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department. The rezoning and map amendments would be considered at the same hearing as the other entitlements for the project, and contrary to the commenter's suggestion, there is no requirement that such approvals be heard at a separate hearing.

Response to Comment Ind 577-19

In addition to settlement in the water treatment pond, the water treatment plant includes media filtration. Please see Appendix K.4 of the DEIR. The treated mine water discharge will be required to meet regulatory requirements for total suspended solids. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

As stated on Page 4.8-70 of the DEIR, at the Brunswick Industrial Site, a detention basin would be constructed at the downstream toe of the engineered fill placement slopes, above South Fork Wolf Creek. The detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site. During larger storm events, the proposed detention pond on the Brunswick Industrial Site would reduce the peak flows within South Fork Wolf Creek by much more than 5.6 cfs, as shown in Table 4.8-4. Thus, under project conditions, the overall peak storm flows would be lower than they are under existing conditions and therefore would not contribute to increased flooding downstream.

Response to Comment Ind 577-20

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

As discussed on page 10 of Appendix N of the DEIR, the proposed project will have a surplus of water from the natural groundwater flow into the ground workings. Once the initial dewatering is completed, approximately 1,224,000 gallons per day are estimated to be pumped to the surface on an on-going basis to maintain the dewatered mine. The groundwater consumed during operations is estimated to be 84,000 gpd. As stated on page 2 of Appendix N, the mine would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to. The construction of a reservoir large enough to impound this quantity at the project site is not realistic nor feasible and would likely cause additional environmental impacts due to disturbance of other resources on the surface.

Response to Comment Ind 577-21

Please see Master Response 3 – Operator Responsibility.

Individual Letter 578

From: Mike Brisson <mikebrisson49@gmail.com>
Sent: Sunday, April 3, 2022 7:01 AM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: I Vote No on the Rise Gold Idaho Maryland Mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Dear Board of Supervisors

Ind 578-1 **This letter is to inform you that I do not approve of the opening of the Rise Gold Idaho Maryland Mine.**

I agree with all of the top concerns listed below:

Ind 578-2 • The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

Ind 578-3 • Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

Ind 578-4 • Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".

Ind 578-5 • Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 578-6 • Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 578-7 • The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

Ind 578-8 • Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.

Ind 578-9 • Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

Ind 578-10 • The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

Ind 578-11 • Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.

Ind 578-12 :Thank you,
Michael Brisson
20693 Dog Bar Road
Grass Valley, CA 95949
530-913-2724

1

INDIVIDUAL LETTER 578: MICHAEL BRISSON

Response to Comment Ind 578-1
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 578-2
The commenter states that the groundwater model has fundamental flaws and assumptions but does not provide specific reasons and only includes vague references to the "initial start point" and "baseline data assumptions."

The DEIR examined groundwater-related impacts extensively. That analysis may be reviewed at DEIR Chapter 4.8 – Hydrology and Water Quality, the Groundwater Hydrology and Water Quality Analysis (Appendix K.2), the Groundwater Model Report (Appendix K.3), the Preliminary Drainage Analysis (Appendix K.5), and the West Yost Peer Review (Appendix K.7.) The commenter is also directed to Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 578-3
The commenter states that the DEIR should include more comprehensive management of asbestos but the commenter does not explain how the DEIR is inadequate in this regard. The commenter is directed to Chapter 4.3 of the DEIR which analyzes asbestos in the context of air quality impacts and Master Response 4 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 578-4
The commenter states that the DEIR excluded elements that would cause the project to exceed the GHG emissions threshold, but does not explain what elements were excluded. A net zero threshold for GHG emissions is not required for the project. Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 578-5
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 578-6
The commenter states that the DEIR does not discuss construction time estimates which impacts the noise, traffic, and air analyses. Please see Master Response 24 – Project Construction Schedule. As discussed in Master Response 24, the project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce estimates of environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities.

Response to Comment Ind 578-7
The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise from dumping of mine waster but does not provide specific reasons as to how the DEIR is inadequate. The DEIR discusses noise impacts in Chapter 4.10, Noise and Vibration. In addition, please see Responses to Comments Grp 21-130 and Grp 21-131.

Response to Comment Ind 578-8

The commenter states that the DEIR must discuss the potential for moisture cloud plumes and associated impacts to aesthetics or air traffic hazards. Moisture clouds from mine ventilation are not expected to occur and would not cause air traffic hazards or change the significance conclusion of the DEIR for aesthetics. Please see Response to Comment Grp 7-95.

Response to Comment Ind 578-9

Please see Response to Comment Grp 21-144.

Response to Comment Ind 578-10

The commenter states that the DEIR does not demonstrate that the impacts to biological and aquatic responses would be less than significant, but fails to provide specific reasons why the DEIR is inadequate. The DEIR discusses impacts to biological resources in Chapter 4.4 and impacts to hydrology and water quality in Chapter 4.8.

Response to Comment Ind 578-11

The commenter states that meteorological data used to assess the health risk of airborne pollutants does not fit Grass Valley's profile or accurately reflect local conditions. The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA**.**

Response to Comment Ind 578-12

This comment is the signature line of the comment letter. A response is not required.

Individual Letter 579

To whom it may concern: 3/9/2022

The Idaho-Maryland Mine Project is a bad idea for the community. I am writing from Philadelphia, PA, and am the son-in-law of a Grass Valley resident, Caroline Courtright. I have been a corporate bond analyst for 16 years, covered the metals and mining sector for roughly 5 years, and that included gold miners. So, my perspective is from a financial analyst. That said, I am writing you on a personal level and not from my employer's perspective. I assume you will hear significant doubts about the negative environmental impacts the mine will have from other concerned citizens. Even though I agree with the opponents of the mine reopening on an Environmental, Social, and Governance (ESG) basis, I wanted to provide doubts on a financial basis.

Ind 579-1

Caroline told me about the potential of the mine reopening about 10 years ago following gold prices rising during that time. I thought it would be a near impossible act to reopen the mine in the middle of two cities then, largely because it would be too expensive to restart and operate the mine among an area that values the environment the way Nevada County residents do. Recently, I learned of the EIR that supports the mine reopening, so I wanted to learn more about the project as a potential investment, after all, Rise Gold is a publicly traded company.

I am appalled by the fact that there is so little financial information available from Rise Gold. Other investable gold miners utilize a metric called "All-In Sustaining Costs" (AISC) to describe the cost to produce one ounce of gold. AISC's line items include cost of sales excluding depreciation and amortization, royalties, and production taxes but includes treatment and refinement charges. In addition, AISC's additional costs include sustaining capital expenditures, leases, general and administrative costs, and minesite exploration and evaluation costs. The lowest cost gold miner can operate in the $1,000/ounce area (Barrick Gold) and other higher cost operators (New Gold) operate in the $1,500/ounce range. This variance is largely due to by-product credits (Barrick's mines contain copper as well as gold). Simply put, if gold prices fall below $1,500/ounce, New Gold would stop mining gold because it would be losing money. Rise Gold has not published its expectations for AISC. I think this information is pertinent because that metric would inform Grass Valley and Nevada City citizens and the potential employees of Rise Gold when the mine can be expected to operate.

Ind 579-2

Rise Gold has not published a feasibility study for the Idaho-Maryland mine. The goal of a feasibility study is to demonstrate the project is economically viable if it is designed, constructed and operated in accordance with the concepts set forth in the study. The feasibility study will define the Ore Reserves, the mining methods, the mineral processing concepts, and the scale of the project. To my knowledge, Rise Gold has commented on the mining methods, mineral processing concepts, and some aspects of the scale (1,000 tons/day). Every other gold miner I covered performed a feasibility study in order to convince investors the investment in a new project was a good one. The process can take up to 7 years. The fact Rise Gold has not performed a feasibility study is concerning not only for potential investors but also the community does not know if the mine can operate profitably. If Rise is promising 300 jobs once the mine is fully operational, we do not know the time frame of the mine opening, the time to full production, nor do we know how long the mine can operate. Every gold miner publishes in its 10-K and Annual Report its Reserves and Resources. Those numbers provide the mine life to investors (the calculation is simply Reserves/Annual Production). The fact Idaho-Maryland operated from 1866-1955 would suggest the Reserves and/or the Resources might be minimal. This should be disclosed to everybody. Here, I note that the Reserves and Resources change every year with the price of gold. Some gold reserves at different mines are more costly to extract than others; therefore, a gold miner has to annually adjust its Reserves and Resources.

Ind 579-3

Aside from the lack of AISC, the lack of Reserves, and the lack of a total project cost, which makes Rise Gold a poor investment, Rise Gold has a complete lack of capital for a full scale mine. Rise Gold stated it would pay 300 people an average of $90,000/year during full production. Those would be

Ind 579-4

nice jobs to have in Nevada County, but how can Rise Gold pay those people $27 million/year when its market capitalization is $15.8 million? Rise's most recent equity financing totaled $2.4 million. I do not know what that Use of Proceeds are, but this financing as well as recent other investments in Rise Gold amount to kicking the can down the road. Due to Rise Gold's poor capital position, I would question the Company as a going concern and its ability to fund the operations.

Ind 579-5

On the ESG front, I do not see how one could invest in Rise Gold. On an environmental basis, it is impossible for the environment to benefit with a gold mine operating in the populated area. There are too many operational risks that could occur even for an experienced miner, let alone the CEO of Rise Gold. Local high paying jobs is the only social benefit. On governance, the CEO appears to be untrustworthy based on his previous experiences with trying to mine gold in other parts of North America. The CEO is the only employee of the Company according to Rise Gold's 10-K, so he has no checks and balances. He has little expertise on operating a mine which does not bode well for the likely failure of mining operations in an area where catastrophe could occur and create unwanted or unexpected fallout.

Ind 579-6

In sum, Rise's inability to produce basic gold mining fundamental operating costs, reserves, and project cost forecasts should limit its ability to produce from Idaho-Maryland forever. If history is any guide, gold prices will remain volatile, and Rise Gold will over promise and under deliver. It would be a disgrace to allow Rise Gold the opportunity to mine anything from Nevada Country over 5 years, let alone 80 years.

Sincerely,
Mike Frey

Idaho.mmeir@co.nevada.ca.us

INDIVIDUAL LETTER 579: MICHAEL FREY

Response to Comment Ind 579-1
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 579-2
The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2.

Response to Comment Ind 579-3
The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also states that the reserves and resources within the project area might be minimal; however, no evidence is provided to substantiate this speculative claim. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Since 2018, Rise has been conducting exploration drilling to characterize underground resources in anticipation of future mining. Earlier exploration drilling as part of the former Emgold application has confirmed presence of gold resources.[3]

Response to Comment Ind 579-4
The comment does not address the adequacy of the DEIR. The financial concerns of the comment are outside the scope of CEQA. Please see Master Responses 1 and 2.

Response to Comment Ind 579-5
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

Response to Comment Ind 579-6
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

[3] See Amec Foster Wheeler. *Technical Report on the Idaho-Maryland Project*. June 1, 2017.

Individual Letter 580

From: Michael Habeeb <mlhabeeb338@gmail.com>
Sent: Monday, April 4, 2022 4:32 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine DEIR Comment Letter

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April 4, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Ind 580-1

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed project would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as damage the character and vitality of the community.

Significant and Unavoidable Impacts

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

Ind 580-2

• Aesthetics

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

• Noise

1

Ind 580-2

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

• Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way). Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

Preference of the No-Build Alternative

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensures that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.

Ind 580-3

- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not substantial adverse effect would not occur to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.
- Geology/Soils

- The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.

- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
  - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.
- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.
- Tribal Cultural Resources

3

- The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.

- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

Beyond the Scope of CEQA

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area.

Ind 580-4

California droughts are affecting the entire state and the dewatering of our ground water supplies are going to exacerbate the issue. The area is highly prone to wildfire and the existence of the proposed project will exacerbate the wildfire risk within the project area which would affect the community at large. The permit period of 80 years is far too long, that is longer than most individuals may live and could have devastating effects on the community that would go unchecked for 80 years. The jobs the proposed project may bring into the area do not offset the potential impacts to the community and the environment. This is a quaint and appealing town, please do not decimate the positive aspects of this town for big business.

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me here, mlhabeeb338@gmail.com.

Sincerely,

P [illegible]

Michael Habeeb

4

INDIVIDUAL LETTER 580: MICHAEL HABEEB

Response to Comment Ind 580-1

The comment does not directly address the adequacy of the DEIR. The commenter states that the DEIR identifies impacts that are considered significant and unavoidable.

The DEIR states that, before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. (DEIR, p. 1-9.) The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis. (*Ibid.*) The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. (*Ibid.*) If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. (*Ibid*.)

Response to Comment Ind 580-2

The comment restates content from the DEIR and does not address its adequacy. No further response is required.

Response to Comment Ind 580-3

The commenter indicates a preference for the No Project Alternative and does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 580-4

The comment expresses property value concerns, which are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also expresses concerns regarding drought and wildfire. Please see Master Response 6 – Wildfire Impacts and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 581

From: Michael Leydon <mleydon@sbcglobal.net>
Sent: Monday, April 4, 2022 4:00 PM
To: Idaho MMEIR
Subject: Comment Idaho-Maryland Mine DEIR

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RE: Idaho-Maryland Mine DEIR Deficient

The Idaho-Maryland Mine DEIR is deficient as it contains incomplete analysis of individuals whose wells will fail due to mine operations. As a proposed mitigation measure, persons whose wells fail will be forced to connect to and use NID water as their source of potable water.

Ind 581-1 According to the NID Annual Water Quality Report 2020, treated water delivered by NID contains both haloacetic acids and trihalomethanes. Both haloacetic acids and trihalomethanes are known and real carcinogens. To fully analyze impacts on persons whose wells fail due to Idaho-Maryland Mine operations, it is necessary to include the procedures and costs necessary to remove haloacetic acids and trihalomethanes from the water provided by NID to persons forced to use NID water. This analysis is required due to the exposure to carcinogens as a result of mine operations – an exposure to which they are not currently subjected.

Ind 581-2 According to the NID Annual Water Quality Report 2020, treated water delivered by NID also contains chlorine. Chlorine is emerging as a suspected carcinogen and is the subject of much research regarding its impact on health, particularly regarding its effects on those suffering from chronic respiratory disease (including asthma), those with food allergies, and other at-risk groups. Consequently, the Idaho-Maryland Mine DEIR must also identify those groups who may be negatively impacted by being forced to consume and use chlorinated water and the procedures and costs to remove chlorine from the water provided by NID to these groups.

Ind 581-3 According to the NID Annual Water Quality Report 2020, treated water delivered by NID contains numerous other substances all of which must be analyzed for their potential impacts to determine the necessity of removing such substances from the water to be delivered to those forced onto NID water usage as a result of Idaho-Maryland Mine operations. For those substances requiring removal, the DEIR must present an analysis of the procedures and costs to NID of attaining effective removal.

1

Thank You,
Michael Leydon

INDIVIDUAL LETTER 581: MICHAEL LEYDON

Response to Comment Ind 581-1

Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the commenter's treated water concerns, it is noted that drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report.[4] As noted in the Water Quality Report, the reported haloacetic acids are below the maximum contaminant level, and therefore, no violation is reported. The same is true for trihalomethanes.

Response to Comment Ind 581-2

The NID Annual Water Quality Report (Reporting Year 2021) indicates that reported chlorine levels are below the maximum contaminant level, and therefore, no violation is reported. Please also see Response to Comment Ind 581-1.

Response to Comment Ind 581-3

As noted in Response to Comment Ind 581-1, drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report.

[4] See https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf.

Individual Letter 582

From: Michael Malakian
To: Planning
Subject: Comment
Date: Wednesday, February 9, 2022 3:32:21 PM

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Ind 582-1

I read today that a few hundred postcards in support of the mine proposal went to the board today. I'm sure the board will realize that this is a massive minority view.

Just wanted to formally comment my opposition to this proposed renewed mine.

Thanks

INDIVIDUAL LETTER 582: MICHAEL MALAKIAN

Response to Comment Ind 582-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Individual Letter 583

From: MICHAEL SHAW
To: Matt Kelley; bdofsupervisors
Subject: Opening the Mine
Date: Monday, February 28, 2022 5:01:33 PM

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Dear Matt and Board of Supervisors,

I am writing to you about my concerns regarding the mine. I have read the draft of the Impact Report and find it to be deceptive in so many areas that I could write a book about it. I will only address one issue in this email though, ground water.

Ind 583-1

Removal of the water from the mine, or "dewatering" as it is casually refers to it as being. The models used are incorrect according to hydrologists that are not paid for by the mine. Per hydrologists with no skin in the game, the report is not accurate and assumes a lot that is not proven. For one thing the source of the water on Banner Mountain and the surrounding areas for miles in all directions, comes from Mount Lassen. Tests prove that this is a fact. Another fact about this is that it takes the water about 40 years to arrive here from Mount Lassen. Removing the water from the mine will not only remove the water in the mine but it will eventually remove the water in every well above the level of the pumps, with the higher elevations of course, being the first to lose water. Not only will the wells dry up but so will the ground. The removal of the water will also remove the hydraulic pressure the water creates in the groundwater. The hydraulic pressure is what drives the water through the billions of small openings allowing it to spread throughout the area. Wells drying up is only part of the problem. The forests will suffer as well. What about the residents? Where will our water come from? There is no other water service in our area. There are numerous homes with no access to NID water currently. Who will install the water infrastructure to these homes and who will be forced to pay for it? How long would that take and when would it begin? What would we do for water in the mean time? Is NID going to pay for the installation and absorb the costs? I doubt this very much. More likely it could cost each resident tens of thousands of dollars to have water mains and service to their homes installed. We don't have that sort of money to spend on water. Our property values would drop to zero. We could not sell our home for market value if we wanted to move away. Fire insurance which is already much too high would be even more unaffordable if it was even available. And who knows what else could be in the nasty details of this bad prospect as a result.

Ind 583-2

Ind 583-3

Ind 583-4

In 583-5

I urge you to please say no to this fraudulent scheme.

Thank you for taking a moment to read my email.

Sincerely,
Michael Shaw
11168 juniper Dr.
Nevada City, CA 95959

INDIVIDUAL LETTER 583: MICHAEL SHAW

Response to Comment Ind 583-1

The commenter states that the DEIR is inadequate with regard to groundwater impacts because independent hydrologists that the DEIR is inaccurate. However, the County's independent consultant, West Yost, peer reviewed the DEIR's Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the project. (DEIR, p. 4.8-40; Appx. K.7.) The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 583-2

The commenter states that the dewatering of the mine will result in adverse impacts to groundwater supplies. The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 583-3

The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 583-4

The DEIR found that impacts to groundwater supplies would be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 33 – Groundwater Dependent Vegetation.

Response to Comment Ind 583-5

The commenter is concerned that the project's potential impacts to groundwater supplies would have an adverse effect on property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Individual Letter 584

From: MICHAEL SHAW <ten9t7mike@aol.com>
Sent: Monday, April 4, 2022 1:50 PM
To: Idaho MMEIR
Subject: Negative Impact Vote

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Hello, I have written to the supervisors and planning commission on numerous occasions expressing my opposition to this proposal. I have read the Draft EIR and I have read the comments by those in favor of the mine. What I have not read, however, is where the people that are in favor of the mine reside. It is my bet that they live in areas that are not negatively impacted by the mine's operations. They do not have a well that will be effected, nor will they be in an area of the constant noise, or have to feel the rumbling and blasting day and night, or breathe the air that will have cancer causing pollution blowing for miles around, or deal with the trucks and diesel fumes. In fact, I would bet they live where nothing changes for them, and they only see the promised benefits that is Rise Grass Valley is telling will be the payoff.

Ind 584-1

I am happy that this is an issue that an important board of informed and reasonable people will decide on. If it were to be put to a vote of the public, where most likely, many of the non impacted people live, they would likely vote to pass this measure. And why not? If it goes wrong, who cares? What can go wrong?

Thank you for taking a moment to read this.

Sincerely,

Michael Shaw
11168 Juniper Dr.
Nevada City, CA 95959

1

INDIVIDUAL LETTER 584: MICHAEL SHAW

Response to Comment Ind 584-1

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 585



Certified Number 7021 0350 0002 0513 5112
Return Receipt Requested

March 23, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Ave Ste 170
Nevada City CA 95959-7902

Ind 585-1

This contains my comments on some of the inadequacies present in the Draft Environmental Impact Report. And while I appreciate the extra time you allowed, I did not have time to review the entire 1070-page document, appendixes, technical reports, plans, etc., that took the Raney Planning and Management firm nearly two years to review and prepare.

Noise

Ind 585-2

I take strong issue with the findings of the Noise and Vibration Study. The study's predictions shown for my home are impossible to believe. Noise and Vibration Study Figure 3 shows my house as number 28. For my location, Table 6 lists the baseline ambient daytime noise at 51 db and nighttime noise at 44 db, which according to Figure 2, is the sound of a refrigerator hum or electrical transformer. I've lived at this location for 13 years and, based on my experience, know that both of these figures are overstated. Although I cannot afford a sound study to prove my point, please consider the following:

Ind 585-3

According to the Noise and Vibration Study, the **engineered fill operation** will take place 500' behind my house. Currently, there is just a forest back there with no mechanical or other human noise-producing activity of any kind. Yet Table 17 predicts the fill operation will only be 47 db at my location – less than what the study says is the current ambient daytime noise (51db). This means that 50-100 runs by diesel haul trucks dumping rock out of steel bed trailers, then being graded and compacted by heavy earthmoving equipment emitting backup beeps, will be quieter than no activity at all. **This makes no logical sense.**

Ind 585-4

According to the Noise and Vibration Study, mineral processing will take place 2,000' from my house. Table 22 has the predicted cumulative noise from all nighttime mine operations as being 26 db at my location. This means the study predicts that hoisting 1000 tons of soil and rock 85' above the surface and dropping it into a steel chute, then transporting it 335' on a conveyor and grinding it down, will be quieter than no activity at all (44 db). It predicts that at my house, all this activity, running 24 hours a day, will be quieter than rustling leaves. **I fail to see how any logical person could come to this conclusion and believe this demonstrates the inadequacy of the sound study.**

Ind 585-5

In my August 11, 2020 letter I asked that the county ensure the Draft Environmental Impact Report addressed how such a situation could exist. It did not. The draft EIR is incomplete because it does not explain how a mine operating 24 hours a day can possibly be quieter than having no mine at all.

Air Quality

Ind 585-6

In my August 11, 2020, scoping letter I asked "What contaminants will be in the air exhausted from the mine shaft; where will the wind carry them; and where will the contaminants come down? What impact on the environment will these contaminants have during the 80 years the mine is expected to be open?" **My questions were not answered in the draft EIR.**

Ind 585-7

I see that in the draft EIR, toxic air contaminants [TACs] are addressed under the section on air quality and greenhouse gas emissions. The direction of prevailing winds and pollutant concentrations from a wildfire are discussed and we are told the TAC emissions associated with blasting and crushing would include asbestos and silica emitted from the fugitive dust produced and would also result in emissions of heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Appendix E.1 says, "These emissions could result in elevated concentrations of TAC emissions at nearby receptors, which could lead to an increase in the risk of cancer or other health impacts." However, the applicant's "Proposed Emissions Reduction Measures" only discusses vehicle exhaust emissions and surface fugitive dust control. It does not address TAC emissions from the air exhausted from the mine. I do not see any mention of where the prevailing winds will carry the asbestos, silica, arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium released from the air exhausted from the mine or where these contaminants will come down. Although health impacts are discussed in Appendix E.1, after checking the draft EIR, Appendix E.1, and the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan, I can find no mention or discussion of the effects of the exhausted contaminants over the 80-year life the mine is expected to be open.

The draft EIR is incomplete because it does not address where the wind will carry the contaminants **exhausted from the mine** (not from mine vehicles), where the contaminants will come down, and what impact on the human health and the environment these contaminants will have during the 80 years the mine is expected to be open. Nor does the draft tell us how far vehicle tires will carry contaminants that have been exhausted from the headframe and come down on roadways away from the mine site.

Mineral Rights

Ind 585-8

The description of the mineral rights owned by Rise Grass Valley are too vague to be of any value: "The much larger mineral rights boundary encompasses **approximately** 2,585 acres and **generally** contains properties surrounding the Brunswick and Centennial Industrial Sites, with the **majority** of additional land area located north of the Brunswick Industrial Site and east of the Centennial Industrial Site. This **generally** includes most of the Nevada County Airport and

surrounding Air Park, as well as property along both sides of Brunswick Road, Greenhorn Road, and Idaho Maryland Road [emphasis added]."

The map provided in the draft EIR Figure 3-2 outlining the mineral rights areas, does not provide enough information to determine whether an individual's property lies within the mineral rights boundary. Only a few major roadways are identified.

A more detailed map, showing street names along the mineral rights boundary is needed. A more complete description of the mine's mineral rights area also is needed. Such a description should list the parcel IDs of the properties the mineral rights are under.

The map provided in the draft EIR Figure 3-2, Project Location Map, identifies two detail maps – 3b and 3c, however nowhere in the draft EIR are maps identified as detail 3b and 3c available. **These two detail maps need to be included.**

Emergency Evacuations

DEIR Section 4.7-4 states that the mine's impact would be less than significant with an adopted emergency response plan or emergency evacuation plan.

Ind 585-9

The analysis contained in Section 4.7-4 of the mine's effect on emergency evacuations is **incomplete as it only discusses the impact haul trucks would have on evacuations**. The section **does not** examine the effect the evacuation of **mine employees** would have on the emergency evacuation of area residents. The draft EIR, Table 3.8, "Operations Workforce" shows there will be 111 employees per shift, thus there will be many vehicles - up to an additional 111 - exiting on Brunswick Road during an emergency evacuation. The draft EIR points out that, "According to Table 4.1 of the Circulation Element of the General Plan, Brunswick Road is considered a Minor Arterial, and thus, is not a primary evacuation route for the County." (Note that Brunswick Road will be the major road for trucks and other mine-related vehicles to use.) There may be no way to mitigate the mine adding up to 111 additional vehicles onto a minor arterial during an emergency evacuation. In addition, there is no mention of what action would be taken if an emergency evacuation took place while a truck carrying explosives was en route to the mine on Brunswick Road or was being unloaded at the mine site at the time of an evacuation. **These two omissions could change the impact under Section 4.7-4 to "significant" and need to be reviewed.**

Ind 585-10

Explosives

Ind 585-11

Draft EIR section 3.7 states that "Explosives would be transported to the Brunswick Industrial Site a maximum of once a week to a minimum of once every three weeks." Section 4.7-1 states "During operations, explosives would be transported to the Brunswick Industrial Site a maximum of once a week and a minimum of once every three weeks. **During initial underground construction, explosives may be transported to the site more frequently** [emphasis added]."

However, Section 4.7-1 also tells us, "The Hazardous Material Inventory Statement for Brunswick provides that a maximum of 28,000 pounds of explosives will be stored underground. Rise intends to use approximately 0.93 tons of explosives and approximately 257 detonators per day...."

By dividing the total pounds of stored explosives by the number of pounds used per day, it is apparent that the entire stock of explosives would be depleted in 15 days – 0.93 tons/2,000 pounds per ton=1,860 pounds used per day. 28,000/1,860=15 days. Thus, it is **not operationally feasible** that delivery of explosives would take place only once every three weeks.

As shown above, Sections 3.7 and 4.7-1 need to be recalculated to show an increase in explosives delivery to more accurately reflect that – at a minimum – explosives would have to be transported to the site every two weeks**. Since more frequent transportation and above-ground handling of explosives increases risk, it would be logical to assume that the level of significance would also change.**

Ind 585-12

Rise Grass Valley says they will use 257 detonators a day, however, there is no information on how many detonators or detonating cords will be stored in the explosives magazines or how often they will be transported through Grass Valley. Only ammonium nitrate is included in the 28,000 pounds of explosives shown on the "The Brunswick Industrial Site Nevada County Department of Environmental Health Hazardous Materials Inventory Statement Form" submitted by Rise Grass Valley. Draft EIR Table 4.7-1, "Explosives Proposed to be Used at Project" lists the following Detonators - Digishot, Driftshot, NONEL EZ, NONEL LP, i-kon, Exel, Handidet. However, none of these are listed on the Hazardous Materials Inventory Statement Form mentioned above. In addition, Table 4.7-1 lists hazard classes of 1.1b or 1.4b for the detonators. Since hazard class 1.1b includes "Explosives that have a mass explosion hazard" and 1.4b includes "Explosives that present a minor explosion hazard," **the draft EIR needs to provide the names of the actual detonators that will be used, their hazard class, the quantity of each type kept in the explosives magazines and the frequency of transportation**. Without this information, the draft EIR cannot be adequately evaluated.

Diesel Fuel Tanks

Ind 585-13

Table 3-5 of the Draft EIR maintains there will be two 12,000-gallon diesel fuel tanks at the Brunswick Site, yet both the initial Project Description (Tables 5 and 9) and the draft 3.0 Project Description (Tables 3-4 and 3-8) list one 30,000-gallon diesel fuel tank. **Which is it – two 12,000-gallon tanks or one 30,000-gallon tank?** Please provide the correct number and capacity of the diesel fuel storage at the Brunswick Site and reissue either the Draft EIR or Project Description with the correct information so it can adequately be reviewed.

Asbestos

Ind 585-14

Draft EIR section 4.3-2 Asbestos Dust Mitigation Plan does not address the following:

"All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device."

Since employee vehicles will exit on Brunswick Road, how will traffic on Brunswick Road be managed during the wet sweeping or vacuuming? How will traffic on East Bennet Road be managed? Will traffic be stopped during the operation? **None of this was considered in the traffic study.**

"A gravel pad designed and maintained to effectively clean tires of exiting vehicles, a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project."

Ind 585-15

Since the gravel pad or 50 feet of pavement are used to capture dust containing asbestos, it seems logical that the concentration of asbestos would be much greater in this area, yet there is no discussion of what happens to the asbestos dust captured in these areas during rainstorms or snow melts. **Where will the dust end up - will it wash into the south fork of Wolf Creek?**

"All active storage piles shall be adequately wetted or covered with plastic to ensure that no visible dust crosses the property boundary."

Ind 585-16

Since the piles of engineered fill will fall under this provision, this means **44 acres at the Centennial Site and 31 acres at the Brunswick Site would have to be kept adequately wetted around the clock or covered with an immense amount of plastic.** Yet Table 3.7, Hours of Operation only provides staffing for the Placement, grading, and compaction of engineered fill from 7:00 am to 3:30 pm Monday to Friday. There are no provisions for keeping the piles of fill adequately wetted outside of those hours. **Obviously, the wind does not stop blowing at 3:30 or on weekends.** Furthermore, the draft EIR section "Water Supply and Other Utilities" only provides water for compacting fill at the Centennial Site eight hours per day, five days per week. **If the Centennial fill piles need to be kept wetted after 3:30 pm or over a weekend, more water will be required. This has not been taken into consideration.**

Methane

Ind 585-17

There is a concern that the draft EIR incorrectly assessed the possibility of methane in the mine. The 1931 US Department of Commerce Bulletin 347, "Gasses that Occur in Metal Mines" tells us that methane is likely to be present: "In the Grass Valley (Calif.) gold-mining district, where carbonaceous shales are found in conjunction with or close to the gold-bearing measures, some rather extensive and troublesome accumulations of methane have been found." Yet the Air Quality and Greenhouse Gas Emissions Analysis Technical Report shows zero methane released from underground blasting/mining in Table 22. **It appears the author of the report assumed no methane is present in the mine. Bulletin 347 makes it clear more research is needed.**



Brunswick Site Native Resident Wildlife

This concerns draft EIR section 4.4, Biological Resources. According to the Brunswick Industrial Site and East Bennett Road Right of Way (ROW) Biological Resources Assessment (Brunswick BRA), the scope of the report was limited to evaluating the Brunswick and Centennial Areas for the presence of any sensitive biological resources including special-status plant and wildlife species. Out of the 133 pages in the report, only 185 words dealt with deer habitat on the Brunswick site and there was no discussion of any other native resident wildlife. As will be established below, draft **EIR section 4.4-4, which covers native resident wildlife rather than special status plants and animals, has an incorrect conclusion concerning the impact the mine will have on native wildlife at the Brunswick site.**

The biologist contracted by Rise GV says he "conducted reconnaissance-level wildlife surveys..." Based on these limited surveys and the "Migratory Deer Ranges Nevada County General Plan map," the biologist preparing the Biological Resources report stated, "The field surveys did not record any observations of deer. The Centennial Industrial Site and Brunswick Area do not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas." Because he did only a preliminary survey and did not observe any deer, he incorrectly concluded in draft EIR section 4.4-4, "Given the above, the proposed project would not interfere substantially with the movement of any wildlife and a less-than-significant impact would result."

Ind 585-18

Without observing any deer, the biologist decided that "The primary movement corridor within the Brunswick Industrial Site is South Fork Wolf Creek and its associated riparian zone." According to the two paragraphs devoted to Critical Deer Habitat in the Brunswick BRA, the biologists came to this decision by reviewing the Nevada County General Plan. The General Plan section on deer habitats was based on a 1991 California Department of Fish and Game study. A lot has changed at the Brunswick site since 1991 including the shutting down and removal of the Bohemia Sawmill which ran 24 hours a day. **The biologist was not hired to provide updated information concerning deer and other native wildlife and thus relied on 30-year-old information.**

Thirty-one acres of the 119-acre Brunswick site will be covered with engineered fill. To accommodate the fill, 18.7 acres of forested area will be clear cut. **This area is covered with game trails that the biologist chose not to investigate further or mention in his report.** I have lived next to the Brunswick site for 13 years and know that the site holds not only deer but contains other wildlife as well. To demonstrate this point, I purchased and placed a trail camera along obvious game trails (trails the biologist must have seen) in the site's forested and future fill areas from February 2021 through February 2022.

Exhibit A has screenshots from the trail camera, showing deer in different locations throughout the year and throughout the forest, including several of does and their fawns. I have many more examples of deer, some showing deer active at nighttime, but am limiting my exhibit to a

single page of daytime shots as it illustrates my point that the Brunswick site holds a year-round native deer population where doe give birth to their fawns.

Exhibit B shows that the forest is also home to many other species of animals that the biologist failed to mention or consider. These include, but are not limited to, black bears, mountain lions, bobcats, turkeys, opossums, and foxes. (Exhibit C shows the approximate locations where the trail camera was placed.) Exhibit B further shows that many of the animals inhabiting the Brunswick site are active at nighttime when it is dark and quiet. Yet even though the Brunswick site will create noise 24 hours a day and be illuminated by a total of 110 outdoor lights that will shine all night long, the biologist concluded, "...noise and nighttime lighting related to proposed operations would not be anticipated to result in adverse impacts to wildlife behavior." **Based on the many animals active at night this conclusion needs to be revisited.**

The Standards of Significance section of the draft EIR says, " a significant impact would occur if the proposed project would...Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Exhibits A and B prove the operation of a mine and clear-cutting the forest would have a **significant effect** on established native resident wildlife. These pictures also demonstrate the limited scope of the biological study, which should put the entire study in question.



Michael Shea
PO Box 927
Cedar Ridge CA 95924

Attachments:

Exhibits A, B, C

Exhibit A

Deer inhabiting the Brunswick Site



Exhibit B

Other Animals inhabiting the Brunswick Site

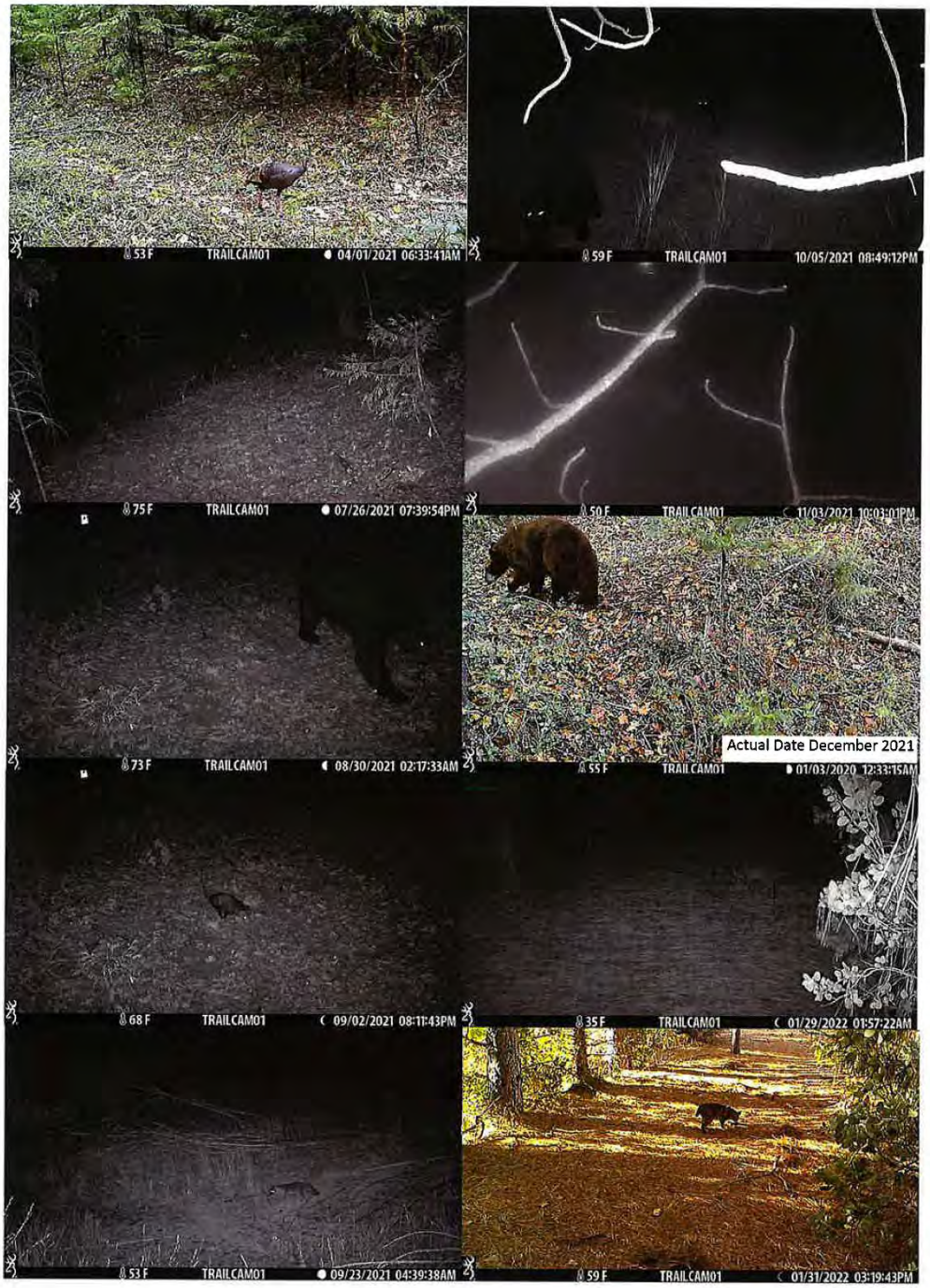
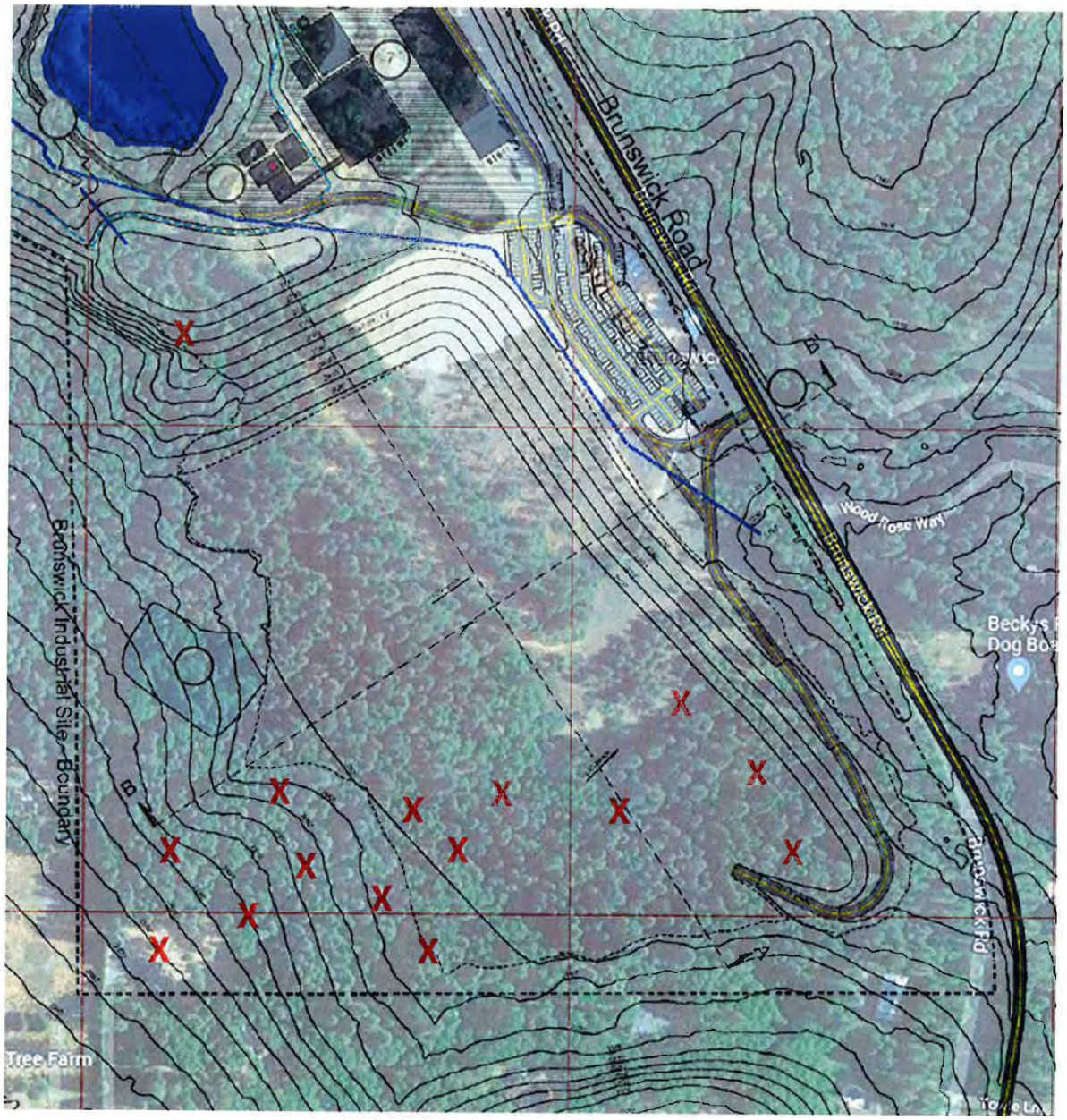


Exhibit C

Approximate Trail Camera Locations



INDIVIDUAL LETTER 585: MICHAEL SHEA

Response to Comment Ind 585-1

This comment states that the DEIR is inadequate and the review period was not long enough for review. Responses to specific comments are provided below. CEQA requires a minimum 45-day public review period for DEIRs submitted to the State Clearinghouse (PRC 21091). The County elected to provide an extended DEIR review period of 91 days from January 4, 2022, to April 4, 2022. Thus, this extended review period is substantially longer than typically provided for a public comment period.

Response to Comment Ind 585-2

The commenter disagrees with the findings of the Noise Study. The level of 47 dBA predicted for this receptor (Receptor #28) during daytime engineered fill operations at the Brunswick site is the noise-generation of the engineered fill operations alone. (DEIR pp. 4.10-5; 4.10-18 and Table 4.10-6.) When added to the existing average ambient daytime noise level of 51 dB at this receptor, the existing plus project noise exposure at this receptor computes to 52.5 dBA, or an increase of 1.5 dBA over existing average ambient conditions at this receptor. (Id.) An increase of 1.5 dBA is not considered significant relative to the project's standards of significance. The noise analysis was not intended to imply that the project would result in an overall decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences.

The commenter states that earthmoving equipment would emit backup beeps. However, Mitigation Measure 4.10-1, requires that all mobile equipment shall be fitted with broad-band “growler” type back-up warning devices rather than the conventional “beeper” devices, which “growler” type devices are known to be much less annoying.

Response to Comment Ind 585-3

Please see Response to Comment Ind 585-4 below.

Response to Comment Ind 585-4

The predicted level of 26 dBA Leq at this receptor during nighttime hours reflects the fact that engineered fill operations would not occur during nighttime hours. During engineered fill operations at locations closest to this residential receptor, the difference between cumulative project daytime and nighttime noise levels is substantial (25 dBA difference in average levels). The predicted level of 26 dBA during nighttime hours reflects the noise attenuation provided by intervening distance to the processing area noise sources (2,000 feet), intervening vegetation, atmospheric absorption, any shielding of project noise sources by proposed buildings or topography, and ground cover. It should be noted that the predicted nighttime level of 26 dBA Leq at this receptor is the noise-generation of the project operations alone. When added to the existing average ambient nighttime level of 44 dBA at this receptor, the existing plus project nighttime noise exposure at this receptor would still be equivalent to baseline ambient conditions. The noise analysis was not intended to imply that the project would result in a decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences.

Response to Comment Ind 548-5

The noise analysis was not intended to imply that the project would result in a decrease in existing ambient noise levels at any sensitive receptors in the project vicinity. Rather, it was intended to imply that the noise generation of the project by itself would be below existing ambient noise levels experienced at the nearest residences. Please see Response to Comment Ind 585-4.

Response to Comment Ind 585-6

A detailed analysis of airborne contaminants, modelled concentrations at receptor locations, and resulting health risk is provided in Chapter 4.3 and Appendix E.2 of the DEIR. The analysis in the DEIR concluded that air quality impacts from the project would be less than significant after implementation of required mitigation measures. (see DEIR Chapter 4.3.)

Response to Comment Ind 585-7

The commenter states that the DEIR does not explain what direction the project's air emissions, including toxic air contaminants, will be carried. The commenter also states that the DEIR does not address contaminants carried by vehicle tires and exhausted from the headframe.

The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HR A presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

The commenter asserts that the ASUR plan does not show the effects of the project's emissions. However, the ASUR Plan is a management plan and discusses how rock will be managed (including sampling and testing) in the future during operations to minimize the public's exposure to asbestos and is not an impact analysis. The project's emissions, impacts and mitigation are analyzed in Chapter 4.3 of the DEIR. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

The commenter states that the DEIR is incomplete because it does not state how far vehicle tires will carry contaminants that have been exhausted from the headframe and come down on roadways away from the mine site. Notably, CEQA requires a good faith effort to estimate emissions from the project during construction and operation. As such, estimation of emissions during the construction and operation of the project are based on project-specific information and industry-standard emission factors and models. Mitigation Measure 4.3-2 requires that "All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device." Further, the project design incorporates mobile tire washing plants. As such, the DEIR includes project features designed to prevent track-out and also requires mitigation for any track-out impacts and

consequently found the related impact to be less than significant. (see DEIR, p. 4.3-82.) The HRA prepared for the project (see Appendix E.1 of the DEIR) accounted for toxic air contaminant emissions from the headframe based on the AERMOD dispersion model. Results of the health risk modeling are conservative and based on the best available data currently available, as described in Appendix E.1 of the DEIR:

> The results determined in this analysis reflect reasonable estimates of source emissions and exhaust characteristics, available meteorological data near the project site, and the use of currently approved air quality models. Given the limits of available tools for such an analysis, the actual impacts may vary from the estimates in this assessment. However, the combined use of the AERMOD dispersion model and the health impact calculations required by OEHHA and NSAQMD tend to overpredict impacts, such that they produce conservative (i.e., health-protective) results. For this reason, the estimated cancer risks and noncancer hazard indices reported in this analysis are likely upper-bound estimates for potential exposure to project-related emissions. In addition, the estimated cancer risks and noncancer hazard indices represent the maximum exposed individual (resident) and do not represent the risk over a broad area. The actual risks of cancer or noncancer effects from the project are likely to be lower than presented herein.

Response to Comment Ind 585-8

The commenter requests a map showing the individual parcels within the mineral rights area, but does not explain why this is necessary for the environmental analysis in the DEIR. Figure 3-2 of the DEIR shows the names of major roads and provides an air photo where most individual homes can be seen in relation to the mineral rights boundary.

Detail Maps 3b and 3c are shown in Figures 3-3 and 3-4 of the DEIR. Please also see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 585-9

The commenter states that the DEIR's analysis of impacts to emergency evacuations is inadequate because it does not account for employee trips. With regard to employee vehicles during an evacuation, please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 585-10

The commenter questions what would happen if a truck carrying or unloading explosives was involved in an evacuation. The project truck traffic accounts for only approximately 1% of typical traffic on Brunswick Road and would not affect an evacuation. Please see Master Response 5 – Evacuation Zones. Trucks used for transportation of explosives would be evacuated similarly to any other vehicle during an evacuation.

Response to Comment Ind 585-11

The commenter asserts that the frequency of explosives deliveries discussed in the DEIR is not accurate, and therefore the significance conclusion should be changed. As stated in the DEIR, explosives deliveries would take place from 1 to 3 weeks. (DEIR, p. 4-7.24.) The average of 2 weeks (15 days as calculated by the commenter) is implied from this range. As discussed on pages 14 and 15 of Appendix M of the DEIR, tunneling (drift) blasts would take place daily but production longhole blasting would take place once every 3-4 days. At certain times explosives may be consumed immediately upon delivery underground when loading larger production longhole blasts. Therefore, explosives consumption is not uniform over every day. As discussed in Chapter 4.7 of the DEIR, the transportation of explosives in the United States is highly regulated and has an excellent safety record. The analysis of explosives transport in Chapter 4.7 of the DEIR does not depend on the precise frequency of explosives delivery to determine the

significance of hazards. Therefore, an increase in frequency would have no effect on the DEIR's conclusion that a less than significant impact would result from explosives transport, storage, and use, after implementation of mitigation.

Response to Comment Ind 585-12

The commenter asserts that the names of the actual detonators to be used, the hazard class and quality of each type of detonator, along with frequency of transportation must be disclosed in the DEIR. The analysis of explosives transport in Chapter 4.7 of the DEIR does not use the frequency of explosives delivery to determine the significance of hazards. As shown in Table 4.7-1 of the DEIR, the detonators used may be classified as either 1.1B or 1.4B but both are in Compatibility Group B, meaning they may be transported and stored together. The ratio of types of detonators would not result in any change to the conclusion of the DEIR and therefore specific details on brands and types of similar detonators, are not necessary or required for the DEIR. Engineering level detail, such as actual brands of detonators or the exact ratio of types, is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 585-13

The commenter requests clarification regarding the DEIR's statements on a 30,000-gallon diesel tank, and other references to two 12,000-gallon diesel tanks. As stated in the DEIR (Table 3-5, Table 3-9, Table 3-10), the project proposes two 12,000-gallon tanks for storage of diesel. Chapter 3.0 of the DEIR is the project description. It is noted that page 1-14 of the DEIR references a 30,000-gallon diesel tank because this section summarizes comments from the public during the NOP scoping process, at which time a single 30,000-gallon tank was proposed; thus, there is no error or contradiction.

Response to Comment Ind 585-14

The commenter asks how traffic will be managed during wet sweeping or vacuuming activities that are required to control dust. As shown in Table 3-9 of the DEIR, mobile tire washing plants are proposed to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed. As shown in Figure 3-8 of the DEIR, all roads outside of the engineered fill piles are proposed to be paved. Therefore, vehicle tires will not require washing as they leave the Brunswick site onto public roads and would not leave visible track-out material on public roads. If necessary, the onsite paved roads could be cleaned to ensure employee and other vehicles do not track dust onto public roads. Mitigation Measure 4.3-2 requires an Asbestos Dust Mitigation Plan and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations are provided in the mitigation measure, which include the removal of visible track-out material. While the project by design is intended to prevent such track out material from occurring in the first place, any necessary wet sweeping or vacuuming activities would be accomplished during off-peak traffic hours and would only take several minutes to accomplish; therefore, no traffic impact from such cleaning would occur. As shown in Response to Comment Ind 648-4, Mitigation Measure 4.3-2, on page 4.3-83 of the DEIR, has been clarified to require that any necessary wet sweeping or vacuuming activities on public roads will be conducted so as to avoid peak AM and PM traffic hours.

Response to Comment Ind 585-15

The commenter asserts that high concentrations of asbestos will result in the gravel pad or pavement areas used to clean exiting vehicle tires, and asks where the associated dust will go. Mitigation Measure 4.3-2 provides several options based on Section e(4)(A)(2) Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. The project proposes

mobile tire washing plants to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed and not rely on gravel pads or 50 feet of pavement to capture dust. Any sediment from tire washing would be captured onsite by the washing plant and disposed of onsite alongside the engineered fill being placed. It would not be washed into South Fork Wolf Creek or other waterbodies. As shown in Response to Comment Ind 648-4, Mitigation Measure 4.3-2 has been edited to add the word "or" in bullet point 3 to clarify that a gravel pad is not required if a wheel wash system is employed.

Response to Comment Ind 585-16

The commenter asserts that the DEIR does not account for the hours of operation and water demand necessary for wetting of active storage piles, as required under Mitigation Measure 4.3-2, with respect to the engineered fill piles. However, the engineered fill piles are not considered active storage piles for the purposes of Mitigation Measure 4.3-2, because the compacted surface of the engineered fill is much more resistant to wind erosion than a loose storage pile from typical construction. Dust is generated from active disturbance (such as digging and dumping) of storage piles, while engineered fill surfaces that are not actively worked have no such disturbance and consequently are not an active source of dust emissions. Once material is placed and compacted it would not be removed again. Side slopes would be vegetated concurrently with construction and the surface would be vegetated after reaching final grade. Constant wetting of the entire site or covering of large areas with plastic is not proposed. As stated in Mitigation Measure 4.3-2, more practical and effective options, such as application of chemical stabilizers are available to control dust of inactive surface areas, if necessary (see Master Response 12 - Chemical Dust Stabilizers). Nevertheless, pursuant to Mitigation Measure 4.3-2 and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Response to Comment Ind 585-17

The commenter asserts that the DEIR should consider impacts from methane in the mine and provides a historic document that states methane is associated with shale in the Grass Valley gold mining district. However, there is very little sedimentary rock or shale in located in the area of the Idaho-Maryland Mine (see Sheet 4 of Appendix K.2). Any mine gases that occurred underground would be heavily diluted by modern mine ventilation flows, which is much greater than those used in 1931. Furthermore, the US Mine Safety and Health Administration regulates the safety in underground mines and regulations include CRF 30 Part 57 Subpart T - Safety Standards for methane in Metal and Non-metal Mines. Methane from the underground mine therefore poses no risk to either the mine or the public**.**

Response to Comment Ind 585-18

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined

impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species acknowledged by the County General Plan is deer migration corridors. Per the Migratory Deer Ranges Nevada County General Plan map, the project site is located in an area of potential Deer Winter Range. The project site does not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas. Any deer within or adjacent to the project site would move outside the project site and would be uninhibited to move into and out of the project site and the areas outside the project site. Thus, substantial interference, which is the operative language in Appendix G of the CEQA Guidelines, would not occur to deer movement. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded it would be less than significant.

Individual Letter 586

From: Michael Way <way_michael@protonmail.com>
Sent: Monday, April 4, 2022 9:40 AM
To: Idaho MMEIR
Subject: Please Don't Reopen The Mine

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Hello,

I hope this message finds you well.

Our biggest concern is the de-watering of the mine.

Ind 586-1 We live at the top of the banner and our well is 400 feet deep and is barely good enough to keep up with our household needs. There are lots of dry wells in our neighborhood and there is no other place on our property to drill a well. Our most recent verbal quote from NID is somewhere in the range of $50k, which would only get us a meter on banner lava cap. We would still need to pipe across several properties and install an intermediate tank on someone else's property.

Perhaps the risk would be justified if the mine was going to extract a mineral that is critical to our future, like lithium, nickel or cobalt.

Please let me know if you have any questions.

Thanks,
Mike

12614 Short Circle
Nevada City, CA 95959
530.305.6559

Sent with ProtonMail secure email.

INDIVIDUAL LETTER 586: MICHAEL WAY

Response to Comment Ind 586-1

The commenter expresses concern regarding dewatering of the mine and impacts to wells. Please Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 587

From: Michelene Bowman <michemiche30@icloud.com>
Sent: Sunday, April 3, 2022 9:20 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine Project

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Ind 587-1

Hello,

I am a local resident of Nevada County of 25 years. I am a business owner as well in the downtown area. My family has a home located off Hwy 174. The mining history in this is County is nothing short of amazing. I have spent many days enjoying The Empire Mine and all that this towns Mining History has to offer. I would like to express my opinions about the Petition to reopen the Idaho Maryland Mine. I believe that the historic site should remain HISTORIC. I DO NOT WANT the project to BEGIN OR THE MINE TO REOPEN. The ecological damage that is sure to come if reopened would be devastating. Our water sources would be at risk , what little of it we have left. There are many reason why we should NOT reopen this mine. Including the lack of jobs it would present, the financial gain our community would NOT have and the 24 hr 7 day a week 80 year lease that would impact our community negatively. Thank you for Listening.
Michelene Bowman

1

INDIVIDUAL LETTER 587: MICHELENE BOWMAN

Response to Comment Ind 587-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to water sources, please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 588

~~I support re-opening the Idaho-Maryland Mine~~

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment will create over 600 new local jobs as a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employee-owned, family-supporting careers with an average expected annual earning of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families as they rebuild stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

I DO NOT SUPPORT RE-OPENING THE MINE!

Name(s) MICHELLE BELON

Address 10894 BETTCHER CT. GRASS VALLEY ZIP 95945

Phone 530-559-2707

Email Address mabelon@yahoo.com

Ind 588-1

INDIVIDUAL LETTER 588: MICHELLE BELON

Response to Comment Ind 588-1

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 589

From: Michelle Lewis
To: bdofsupervisors
Subject: Mine Reopening
Date: Monday, January 24, 2022 10:44:49 AM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 589-1

Given years of drought, groundwater resources being over-utilized by more development, numerous wells already going dry, the idea of exploiting our limited water resources to benefit a foreign company with little cash reserves and no history of mine operation seems…the height of insanity.

Please vote against this ill-conceived proposal.

Thank you,
Michelle Lewis

INDIVIDUAL LETTER 589: MICHELLE LEWIS

Response to Comment Ind 589-1

The commenter generally expresses concerns related to drought and groundwater resources. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 590

From: Michelle Reynolds <mreynolds407@gmail.com>
Sent: Wednesday, March 30, 2022 4:07 PM
To: Idaho MMEIR
Subject: Public Comment RE: Idaho Maryland Mine DRAFT EIR

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Ind 590-1

PLEASE DO NOT ALLOW THIS MINE PROJECT TO MOVE FORWARD IN NV COUNTY.

Through past employment, I have learned about and seen the destruction a major "modern" mining operation like the one proposed can produce in any environment.

Nevada County does NOT need and CANNOT support the disastrous environmental degradation of such an operation. If money or more jobs are needed in the county, we can promote much, much safer options, such as developing a world-class technology hub, among other things.

Thanks for your consideration.

--

Michelle Reynolds

"Earth" without "art" is just "eh."

INDIVIDUAL LETTER 590: MICHELLE REYNOLDS

Response to Comment Ind 590-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 591

feb-18-2022

Dear planning Commition

Ind 591-1 I am writing to inform you that I am against the opening of the Idaho-Maryland Mine. NO Permits Should be granted.

Ind 591-2 If you at all care about this County, you will not Permit the opening of the Mine. The waste alone (no matter how "green" the Company may Run) is enough to see its a bad Idea, and its the least of the harm opening the mine will cause.

Ind 591-3 Thank you for Protecting this County and its residence, and NOT permiting the opening of the Mine.

Sincerly, Mickey Jaynes.

MICKEY JAYNES
16909 Brac place Ct
(530) 575-6797
Mcmy619@gmail.com.

RECEIVED
FEB 23 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 591: MICKEY JAYNES

Response to Comment Ind 591-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 591-2

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 591-3

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 592

Dist 2

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Feb 18 2022

Dear Supervisors,

Ind 592-1 I am writing to inform you I am against the opening of the Idaho-Maryland Mine. No permits should be granted.

Ind 592-2 If you care about this County at all you will NOT permit the opening of the mine. The waste alone is enough to see its a bad idea, and its the least of the harm opening the mine will cause.

Thank you for not opening the Mine and for protecting the residence of this County.

Ind 592-3 Sincerly, Mickey Jaynes

MICKEY JAYNES
16909 Black Place Blv.
(530) 575-6797
Mcmj619@gmail.com

INDIVIDUAL LETTER 592: MICKEY JAYNES

Response to Comment Ind 592-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 592-2

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 592-3

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 593

From: Mielle Chenier-Cowan Rose
To: Idaho MMEIR
Subject: No mine
Date: Monday, February 14, 2022 8:01:58 AM

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Ind 593-1

Hello,
I understand you are receiving public comment from Nevada county residents about the proposed reopening of the Idaho Maryland gold mine. I'm a homeowner who has lived here for 10 years, and I operate two businesses in this county. I am strongly opposed to this mine project, and am in full solidarity with the concerns of the minewatchnc.org group.

Ind 593-2

This mine would pollute our water and air, drain our water table and hurt local wells, cause noise pollution, and risks our community's health. Gold mining has already had its run through this county, and the damages it's done to our local environment are plenty. Let's not go backwards on this.

Thank you for considering our concerns.
~ Mielle Chenier-Cowan Rose
Grass Valley

--
Sent from my iPhone. Please excuse mistakes and brevity.

INDIVIDUAL LETTER 593: MIELLE ROSE

Response to Comment Ind 593-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 593-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1 – Non-EIR and Administrative Issues, Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 594

From: Michael Frasu
To: bdofsupervisors
Subject: mine
Date: Friday, February 18, 2022 8:56:35 AM

Dist 4

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Ind 594-1 Mines of any kind are environmentally unfriendly.

Ind 594-2 1) You risk our water table in a terrible drought

Ind 594-3 2) Toxic chemicals introduced to the air and ground

Ind 594-4 3) Air pollution

Ind 594-5 4) Noise pollution

5) Traffic congestion in an already heavily congested area with more residential housing to come.

Ind 594-6 The jobs that will be created don't even come close to the negative benefits that they will bring. This is not a good idea whatsoever. I can't believe it was even considered from its very inception. Extremely poor decision.

Ind 594-7 How about a logging industry that would allow community residents to actually help the fire situation and give the common unskilled person a job. Between logging , trucking and milling you could really help in many aspects. Rather than a greed based foreign company with a bad track record to profit.

Don't you feel your integrity might be at risk on this decision.

Please give me the positive side of this decision other that some jobs?

Mike Frasu

INDIVIDUAL LETTER 594: MIKE FRASU

Response to Comment Ind 594-1
The comment does not directly address the adequacy of the DEIR. For water table and drought concerns, please see Master Responses 15 and 16.

Response to Comment Ind 594-2
The comment does not directly address the adequacy of the DEIR. For concerns related to toxic chemicals and effects on air and ground, please see the analyses in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; and Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

Response to Comment Ind 594-3
The comment does not directly address the adequacy of the DEIR. For concerns related to air quality, please see the analysis in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; and Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 594-4
The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Chapter 4.10, Noise and Vibration, contains a detailed discussion of the project's potential noise impacts.

Response to Comment Ind 594-5
The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Chapter 4.12, Transportation, contains a detailed discussion of the project's potential transportation impacts.

Response to Comment Ind 594-6
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2.

Response to Comment Ind 594-7
The comment does not address the adequacy of the DEIR, but rather appears to propose an alternative logging industry use for the project site. The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Please see Master Response 3 regarding the comments about the applicant.

Individual Letter 595

30 Mar 22



Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Mr. Kelley,

Ind 595-1

I am writing in opposition to the Idaho-Maryland Mine project. I have received a solicitation for support from Rise Grass Valley, Inc. It suggests there is strong support throughout the community for the re-opening of the mine and that the mine will be safe for the community and the environment. Further, that it will bring jobs and money to our area with careers yielding average earnings of $122,000 per year.

Based on what I have read and in speaking to individuals who live in the immediate area of the mine, I think the benefits of this project and the level of local support have been grossly overstated and the risks underestimated. I think the risk to the environment is great and will last for many years after the mining company has packed up and left and taken the lion's share of the profits with it.

The rhetoric here reminds me of what other large corporations say when selling their plans in smaller communities – they don't live in the area and will not have to live with the difficulties they create. The best jobs do not go to local folks nor does most of the money stay in our community.

I am not what you would typically call an environmentalist, but I am opposed to this project.

Mike French
10838 Alta Sierra Drive
Grass Valley, CA 95949

INDIVIDUAL LETTER 595: MIKE FRENCH

Response to Comment Ind 595-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 596

Matt Kelley, senior planner, Nevada county Planning Dept. 4-2-2002

Idaho Maryland Mine re-opening, Draft Environmental Impact Report

Ind 596-1 I have been farming organically with NID water for 36 years. My water would be tainted with any mistakes in monitoring that Rise Gold make. This mine would monitor itself with only occasional reports from Government monitoring. This is inappropriate. The fox watching the hen house is what it would be. The fox would be Rise gold making big money by sneaking polluted water down Wolf creek to the Tarr ditch to my farm. If my produce is polluted by this mine it would be on me to prove and take legal action for. A large corporation against a small farmer is what would result. The proposed EIR doesn't deal with this problem or many others appropriately.

Thank you Mike Pasner Owner Indian Springs Organic Farm

INDIVIDUAL LETTER 596: MIKE PASNER

Response to Comment Ind 596-1

The commenter expresses concerns that any mistakes at the mine may taint water that could affect their farming operations. Please see Master Response 35 – Discharge to South Fork Wolf Creek.

Individual Letter 597

Way more than 2.4 million ounces when you consider the hedging that had to have went on!! 20% at least! a good thing

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 597-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Mike + Mary Peterson

Address 19619 Legacy LN ZIP 95959

Phone 265 3354

Email Address MPeterson at JPS. Net

INDIVIDUAL LETTER 597: MIKE AND MARY PETERSON

Response to Comment Ind 597-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Individual Letter 598

From: Jan and Mike Weaver <jm.mp31@hotmail.com>
Sent: Friday, April 1, 2022 12:03 PM
To: Idaho MMEIR; Matt Kelley
Subject: Idaho Maryland Mine
Attachments: Addendum Rise Gold Letter 2.2022.docx

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Ind 598-1

We are against the opening of this mine. We live approximately 4 miles from the mine and are opposed to its re-opening. Attached you will find some of our concerns.

Mike and Jan Weaver
10818 Gunsmoke Road
Grass Valley, CA 95945

1

County Board of Supervisors:

I have several concerns regarding the Rise Gold Mine.

Ind 598-2

1. **Well Water:** Although we are 3.5 miles down Greenhorn, we may also be impacted by the voluminous amount of (possible contaminated) water that will be extracted from the mine. We are still in a drought and the snow disaster we had in December, reflects that. Trees had shallow roots because of the lack of water The enormous amount of water that will be then sent down the South Folk Wolf Creek, perhaps overflowing its banks.

Ind 598-3

2. **Traffic:** As I left this morning at 8:45 a.m. to make my right onto Brunswick from Greenhorn I noted that there had to be a least 30 cars lined up at the flashing red light to enter the city or freeway. They were as far back as the exit from the mine on Brunswick. To add 100 trucks coming up from Bennett will probably put this line as far back as the "Y". Many people from outside of GV area, are probably unaware of the extra time it will take them each day to get either into our city or out of it.

Ind 598-4

3. **Toxicity:** Hard rock mining is extremely toxic. Our property was deemed an EPA Superfund in 1998 because of the tailing overflow from the 1997 storms. Because the County could not afford the clean-up, the federal agency stepped in and spent thousands of dollars to correct the toxic waste flowing down the Little Clipper Creek. Taxpayers from all over the country fund EPA. EPA continues to monitor this site and I understand it will always be deemed a Superfund site.

Ind 598-5

There are so many other reasons NOT to have this mine. Perhaps consider having it a permanent green waste space and build a cogeneration (cogen) plant, creating our own clean energy.

We are no longer a Mining Town and anything built in that area should reflect 2022 ideas and not 1849 ideas.

INDIVIDUAL LETTER 598: MIKE AND JAN WEAVER

Response to Comment Ind 598-1

The comment does not address the adequacy of the DEIR, but expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 598-2

The comment does not directly address the adequacy of the DEIR. Regarding well water and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding concerns about flow in South Fork Wolf Creek, please see Master Response 36 – Flows in South Fork Wolf Creek.

Response to Comment Ind 598-3

The comment does not directly address the adequacy of the DEIR, but expresses concerns regarding the Brunswick Road/E. Bennett Road/Greenhorn Road intersection. According to the project's transportation analysis, the intersection of Brunswick Road/E. Bennett Road/Greenhorn Road currently operates acceptably at level of service (LOS) B and C during the "Project Traffic Hours". As discussed on page 4.12-8 of the DEIR,

> Specific time periods were studied based on direction from Nevada County, which included the "standard" AM and PM peak hours and at the three time periods when project employee trips are expected to occur. Under the proposed work periods there is negligible traffic to and from the site during the AM and PM peak hours. The majority of project traffic occurs in the periods surrounding mining shift changes and the end of the administrative personnel work day as identified above; the end of the day for administrative personnel does occur during some peak periods, and this was reflected in the level of service analyses during the 3:30-4:30 PM analysis period. Based on these project-specific characteristics, the CEQA traffic analysis focuses on the three time periods when project employee trips would occur, as these time periods are expected to have the most project-related traffic impacts. The standard peak hour analysis is provided in the Traffic Impact Analysis for informational purposes (see Appendix O).

As shown in Tables 4.12-10 and 4.12-11, with inclusion of project traffic and traffic from 11 other near-term projects (for a listing, see pages 4.12-35 and 4.12-48 of the DEIR), the Brunswick Road/E. Bennett Road/Greenhorn Road intersection is projected to still operate acceptably at LOS B and C.

Response to Comment Ind 598-4

The comment does not directly address the adequacy of the DEIR. It is unclear whether the commenter believes the project is an EPA superfund site. For clarity, neither the Brunswick nor the Centennial Industrial Site is an EPA superfund site. Toxic concerns are addressed in Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.8, Hydrology and Water Quality, of the DEIR.

Response to Comment Ind 598-5

The comment does not address the adequacy of the DEIR, but rather appears to propose an alternative logging industry use for the project site. The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA

Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Regarding the commenter's opposition to the proposed project, please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 599

Mikos Fabersunne•508 Redbud Way•Nevada City, CA 95959-2156•530-362-7007•*msfabersunne@sonic.net*

March 24, 2022

County of Nevada
Community Development Agency
Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617
Attn: Mark Kelley, Senior Planner

Subject: my comments on Idaho-Maryland Mine Project, Draft EIR

Dear Mr. Kelley:

Ind 599-1 I am writing to comment on the Draft EIR (DEIR) for the above project. I am a retired engineer, having last worked for the California Department of Toxic Substances Control (DTSC) in 2011 as a Hazardous Substances Engineer. During my service with the State I reviewed numerous environmental documents, including Preliminary Assessments/Initial Studies and EIR/EISs. I waited to submit comments on the subject project document, expecting that this project would be recognized for what it is--an attempt to deceive the public into believing that the project offers true public benefits to the community when the reality is that there will only be detriments--in the hope that the project proponents would cease further promotion of the project. However, apparently that was not the case, and so I am submitting my comments now.

Ind 599-2 I have read the prior comments on the NOP and the executive summary of the DEIR, as well as the tabulation of likely impacts and proposed mitigation measures delineated in Table 2-1. On its face, this project has so many unmitigable, detrimental impacts upon air quality caused by dust and equipment exhaust produced by digging and hauling operations from 24-hr/day, 7-day/week operation over the projected term of 80 years, and the resulting potential exposure of the public to lead, arsenic and mercury; the depletion of the sub-surface soil-water matrix from the continuous extraction of groundwater and the consequent impact of continuous discharge of the treated water to the environs, that it is folly to proceed with this project. The proponents would be better off to withdraw now, rather than making additional expenditures on preparing a final EIR.

Ind 599-3 There are many others who have seen through the fog of this project and have commented upon the expected adverse impacts on the soils and groundwater, and the threat to human and environmental health that it poses, that there is near universal opposition to this project by the residents of Grass Valley, Nevada City and the unincorporated areas near the project. I add my name to that list.

Ind 599-4 This project should be stopped as soon as possible to avoid the expenditure of additional county staff time and the public's effort in providing further review and analysis.

Thank you for your consideration,



Mikos Fabersunne, P.E.

Comment_DEIR_Mine_24Mar22.docx

INDIVIDUAL LETTER 599: MIKOS FABERSUNNE

Response to Comment Ind 599-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 599-2

The commenter expresses general concerns related to project air quality impacts. Air quality emissions and potential project health effects are evaluated in detail in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please also see Master Response 18 – Air Quality Thresholds, Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations, Master Response 20 – Conservatism Used for Metals in Dust, Master Response 21 – Silica Health Risk, and Master Response 22 – Conservatism Used for Asbestos Assessment.

Response to Comment Ind 599-3

Regarding groundwater extraction concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding concern related to continuous discharge of treated water, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 599-4

The commenter expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 600

From: Miles Wolfers
To: Sue Hoek; bdofsupervisors
Subject: Opposition to the Mine
Date: Wednesday, March 23, 2022 5:31:26 PM

Dist 4

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Ind 600-1

I DO NOT support the opening of the Idaho-Maryland Mine. I have lived here my whole life, and loved growing up in our beautiful community the way it is, and the way it has been for years; natural and clean. We do not need dust and smog clogging our air. The mine would be severely detrimental to the lives of me and all our fellow locals.
Opening the mine is a bad idea.
Thank you for your time,
Miles Wolfers

INDIVIDUAL LETTER 600: MILES WOLFERS

Response to Comment Ind 600-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 601

Dist 4

Dear Board of Supervisors, March 2, 2022

Pardon the profanity on the enclosed card. I was going to just drop it in the mail and let the mine advocates know how I feel.

Ind 601-1

Instead, I was told by some politically wise friends that Rise Grass Valley will most likely not read it, but add it to a pile of postcards and make it look like the returning of postcards affirms the community's desire for the mine to open.

Their tactics are appalling, including the brochure that included this postcard.

Ind 601-2

If you have any desire to protect this beautiful area of ours, you must know how destructive this mine will be to our environment, disrupt many residents' wells, tremendously increase traffic in the Brunswick Basin, etc.

Ind 601-3

I've been a resident for over 40 years. I volunteered for over 10 years for Meals on Wheels, raised money for Hospitality House, and have brought 2 free health care clinics to our community. In other words, I've been a big contributing member of our community. Should this mine be allowed to open, I am seriously considering moving.

I implore you to not let this mine open.

Sincerely, Mindy Oberne

Mindy Oberne
13169 Twin Star Lane
Grass Valley, CA 95949

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ind 601-4

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) FUCK YOU!
Address ZIP
Phone
Email Address

INDIVIDUAL LETTER 601: MINDY OBERNE

Response to Comment Ind 601-1

The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 601-2

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. Regarding well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding traffic-related concerns, please refer to Chapter 4.12, Transportation, for a detailed project transportation analysis.

Response to Comment Ind 601-3

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Response to Comment Ind 601-4

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the project. Please see Master Response 1.

Individual Letter 602

From: Mira Clark <existinspired@gmail.com>
Sent: Sunday, April 3, 2022 9:08 PM
To: Idaho MMEIR
Subject: Comments on (DEIR)

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Dear Matt,

Ind 602-1 I am writing a letter as a concerned resident of Nevada County. I was born here and have lived all over Nevada County, and Grass Valley and have called this place home for the past 31 years.

I am not convinced by the DEIR that adequate measures would be taken by RISE to ensure that toxic Heavy Metal Contamination & Leaching into groundwater would not occur to groundwater, neighboring wells and nearby waterways. I am also not convinced of the mitigation measures described in the DEIR to protect special-status wildlife species. The proposed mitigation measures do not appear to be realistic and disruption to wildlife described in Chapter 4.4 – (Biological Resources) would likely still occur to a significant level. Accounting for mitigation of noise and work/construction disturbances seems impossible to mitigate to a level that would not cause a significant negative impact on wildlife AND still allow RISE to construct and operate the mine feasibly.

Ind 602-2 This is an opinion-based argument, however still valid; How can we trust a foreign company with no local stake in the wellbeing of our local environment and community to do a good job at ensuring safety? Their main motive is extraction-based profit and that overshadows any significant environmental commitment the Rise company has in keeping this land safe and healthy for the current and future generations, I find this to be abundantly evident. If the state of our current world shows anything, it is that corporate greed knows no bounds in its manipulation and ability to cut corners for more profits. It harkens back to the devastation caused by colonial settler Gold Mining extraction which caused a near genocide of the Nisenan People and a huge negative environmental impact. Which our local rivers and wells and lands and Indigenous Peoples are still recovering from... As a volunteer of the local Nisenan Tribe's non-profit CHIRP for over 5 years, I am all too aware of this horrific legacy and history. WE must do better in 2022!

Thank you,

Mira Clark
13000 Gary Lane
Nevada City CA, 95959
530-559-6115

1

INDIVIDUAL LETTER 602: MIRA CLARK

Response to Comment Ind 602-1

The commenter expresses general concerns regarding water quality impacts from operation of the mine. The DEIR addresses water quality in Chapter 4.8, Hydrology and Water Quality, and concluded that impacts would be less than significant after mitigation. Regarding potential impacts to special-status wildlife species, please see Master Response 31 – Rare Plants, Master Response 37 – Birds and Raptors, and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog. The potential effect of noise on wildlife is addressed in Impact 4.4-2 (p. 4.4-74) of the DEIR.

Response to Comment Ind 602-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the applicant and project. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 603

From: Molly Harrison <harrisonmolly@yahoo.com>
Sent: Monday, April 4, 2022 1:37 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Draft EIR Rise Mine

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April 4, 2022
Nevada County Planning Department
950 Maidu Avenue, Ste 170
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To Whom It May Concern:

Ind 603-1 My family has lived here in Nevada County since 1994. I fear this beautiful place and habitat for so much wildlife is now in jeopardy with the proposed mine. I am very much against it due to its effect on the environment. I am concerned about the mine's potential impact on our air, land and water quality. I do not believe the Draft EIR. It seems very likely that mining will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will make. This mine will definitely affect our quality of life in many ways in Nevada County. We live close enough to Highway 20 and 49 so we will be impacted by this noise and pollution, as do many other residents.

Ind 603-2 As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave. Furthermore, the history of Rise Gold does not instill confidence. I am very unhappy with the idea of bringing in a non-local company with no track record of success in this area. We should not be a test case!!!

Ind 603-3 According to Ralph Silberstein, President of CEA Foundation, "This DEIR is riddled with errors, omissions, and legal flaws. We'll see many more impacts listed as significant and unavoidable. Beyond the EIR, our Supervisors will be faced with making the final decision. In the long run, it will very simply come down to whether the mine is good for our community."

Some of the top concerns include:

The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

1

Ind 603-4	Dealing with mine waste - Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.
Ind 603-5	Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".
Ind 603-6	Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).
Ind 603-7	Missing construction time estimates throw off the entire analysis of noise, traffic, and air.
Ind 603-8	The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.
Ind 603-9	Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.
Ind 603-10	Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.
Ind 603-11	The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.
Ind 603-12	Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions. Our environment is so special; we cannot take these kinds of risks with it. Sincerely Pro|#Kdulvq#dg#Mqh#Zdulq#Sidk JW Pfahl and Molly Harrison 15240 Lewis Road Nevada City, CA. 95959

2

INDIVIDUAL LETTER 603: MOLLY HARRISON

Response to Comment Ind 603-1

The commenter is opposed to the project due to a variety of impacts pertaining to groundwater, air quality, and noise but provides no additional detail as to why the DEIR is inadequate. Regarding impacts to air quality and noise, the commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Chapter 4.10 (Noise and Vibration). Regarding impacts to groundwater, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 603-2

The commenter states that no independent monitoring program is proposed for the project. The commenter also references prior mining projects by the Project Applicant. Among the many mitigation measures required in the DEIR are monitoring programs for noise (Mitigation Measure 4.10-3), vibration (Mitigation Measure 4.10-4), and groundwater (Mitigation Measure 4.8-2), all of which will have oversight from Nevada County. In addition, Chapter 4 of this Final EIR contains the mitigation monitoring and reporting program that will need to be adopted by the Nevada County Board of Supervisors, if the project is approved. The MMRP includes all of the project mitigation measures, identifies timing for completion of mitigation requirements, and identifies local and state agencies responsible for monitoring. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 603-3

The commenter states that the DEIR's groundwater model is flawed but does not explain how. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 603-4

The commenter states that the project will produce asbestos-related impacts. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 22 - Conservatism of Asbestos Assumptions, Master Response 23 - Adequacy of Asbestos Sampling, and Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 603-5

The commenter states that the DEIR's analysis of GHG emissions is flawed because the threshold should be net zero. A net zero threshold is not required for the project. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 603-6

The commenter states that CEQA requires a discussion of the remediation of the Centennial Industrial Site to be included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 603-7

The commenter states that the DEIR's absence of a construction schedule skews the analysis of several project impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

Response to Comment Ind 603-8

The commenter states that the DEIR incorrectly assesses nighttime noise and the dumping of mine waste. Nighttime noise including dumping of mine waste is analyzed in Chapter 4.10 of the DEIR and is less than significant after mitigation. Please also see Responses to Comments Grp 21-130 and 21-131.

Response to Comment Ind 603-9

The commenter states that the DEIR must include analysis of aesthetics and air traffic hazards caused by a moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

Response to Comment Ind 603-10

The commenter states that the project does not follow federal mining guidelines. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 603-11

The commenter states that the DEIR does not adequately demonstrate that the impacts to biological or aquatic resources are less than significant, but does not state why. The commenter is referred to Chapter 4.4 (Biological Resources) and 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 603-12

The commenter states that the Health Risk Assessment does not use appropriate data for local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA.

Individual Letter 604

March 23, 2022

Nevada County Planning Department
950 Maidu Avenue, Ste 170
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To Whom it May Concern:

Ind 604-1

My name is Molly Harrison and my family has lived here in Nevada County since 1994. I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air, land and water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County. We live close enough to Highway 20 and 49 to be impacted by this noise and pollution, as do many other residents, as it is impossible to avoid.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave. Furthermore, the history of Rise Gold does not instill confidence. I am very unhappy with the idea of bringing in a non-local company with no track record of success in this area. We should not be a test case!!! Our environment is so special; we cannot take these kinds of risks with it.

Sincerely

Molly Harrison and Warren Pfahl
15240 Lewis Road
Nevada City, CA. 95959

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 604: MOLLY HARRISON AND WARREN PFAHL

Response to Comment Ind 604-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to water quality, please see Chapter 4.8, Hydrology and Water Quality. For concerns related to well impacts and drought, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding diesel fume concerns, please see Response to Comment Grp 21-66. For noise concerns, please see Chapter 4.10, Noise and Vibration.

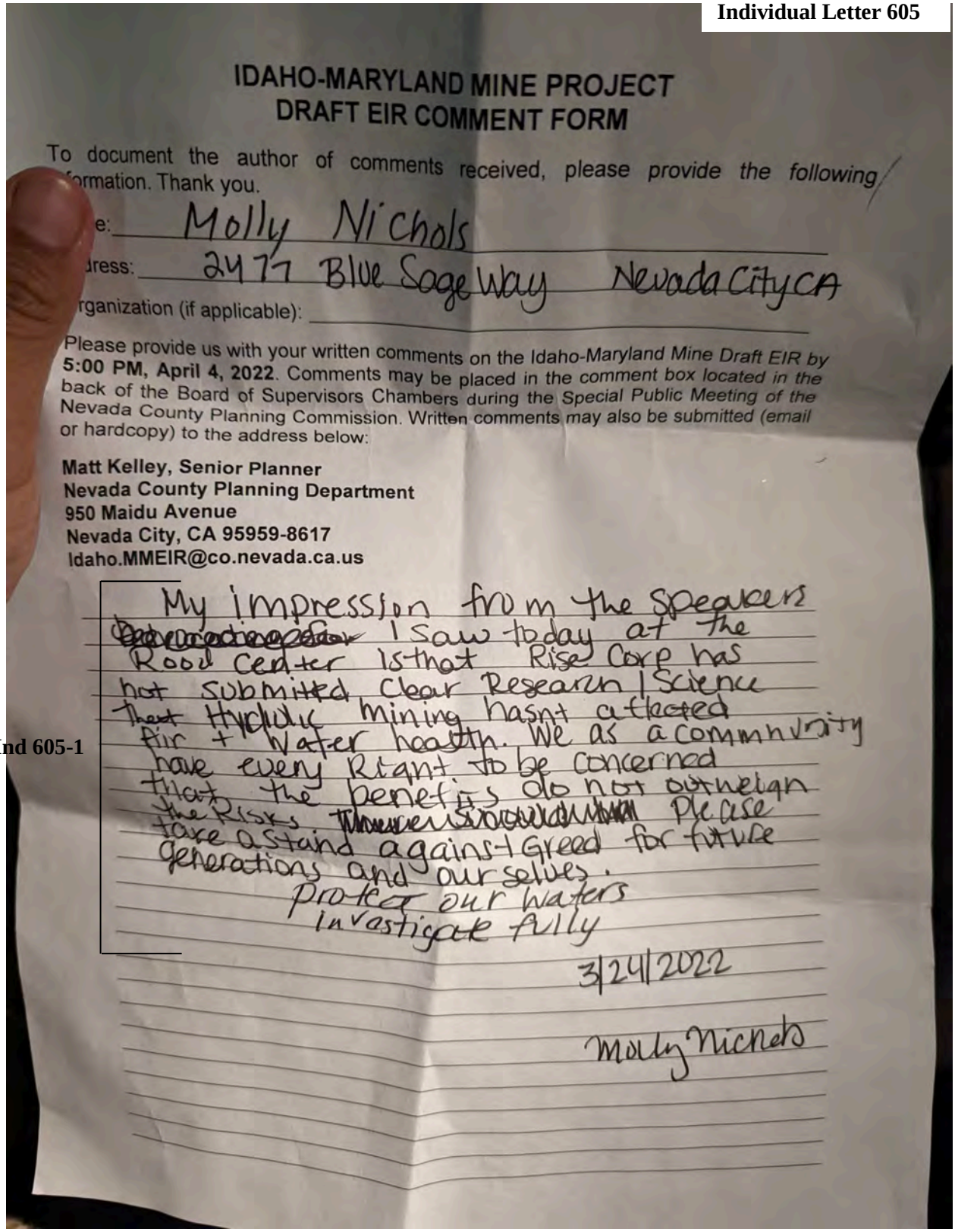
The commenter incorrectly states that there will be no independent monitoring of any of the issues that they are concerned with. For example, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

In addition, the mitigation measures set forth in the DEIR to reduce the severity level of potential impacts specify the monitoring agency responsible for ensuring the mitigation is implemented as written in the DEIR. The Mitigation Monitoring and Reporting Program (MMRP) prepared as part of this Final EIR (Chapter 4) includes a column that summarizes the monitoring agency required by each mitigation measure.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 605



IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Molly Nichols

Address: 2477 Blue Sage Way Nevada City CA

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

My impression from the speakers ~~[illegible]~~ I saw today at the Rood center is that Rise Corp has not submitted clear Research / Science that Hydraulic mining hasn't affected Air + Water health. We as a community have every Right to be concerned that the benefits do not outweigh the Risks ~~[illegible]~~ Please take a stand against Greed for future generations and ourselves.
Protect our waters
investigate fully

3/24/2022

Molly Nichols

Ind 605-1

INDIVIDUAL LETTER 605: MOLLY NICHOLS

Response to Comment Ind 605-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 606

From: Mykola Kindrat <m.kindrat@gmail.com>
Sent: Friday, April 1, 2022 9:31 AM
To: Idaho MMEIR
Subject: I oppose Idaho Mine reopening!!!

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Dear Matt Kelley,

I've been a resident of Nevada County for almost 10 years now. I love this rural community and value its peaceful lifestyle. I know the history of gold mining in this area and the ecological damage it has done. We still, a century later, can't eat the fish from our rivers and ponds - because of pollution from mining!

Ind 606-1

Reopening the Idaho-Maryland mine, right in the heart of the city, is extremely dangerous and will cause trouble for decades or even centuries in the future. Re-evaluation of the impact reports presented by Rise shows multiple errors, omissions, not to mention their manipulation of the public with a flashy mailer they sent out, which is a red sign in itself.

I believe that the only people that are to benefit from this "project" are the shareholders of the company and those they try to bribe. But not the Community, not the people who live here, not our water, air and soil!

I strongly oppose the reopening! Don't let that happen!!!

Sincerely,
Mykola Kindrat

INDIVIDUAL LETTER 606: MYKOLA KINDRAT

Response to Comment Ind 606-1

The commenter refers to multiple errors and omissions in "impact reports presented by Rise" but does not identify specific documents, nor specific alleged errors and omissions. Without such evidence, no further response is possible. The commenter's opposition of the proposed project is noted and forwarded to the decisionmakers. Please see Master Response 1.

Individual Letter 607

From: Nancy Dewey
To: Idaho MMEIR
Subject: Inadequacy of DEIR
Date: Wednesday, March 23, 2022 5:56:55 PM

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

via email: Idaho.MMEIR@co.nevada.ca.us

Mr Kelly,

First, thank you for your service to our community. I know there are strong feelings about a lot of current issues and some in our community are not treating our elected officials and public agency employees with the respect they deserve. I am strongly opposed to the Idaho-Maryland Mine Project for a multitude of reasons and have significant concerns about the findings and inadequacies of the Draft Environmental Impact Report (DEIR). I will focus on one area of concern in this letter, traffic impacts. I hope my sincere and strongly held beliefs about the negative impacts of this proposed project are presented in a constructive manner.

Ind 607-1

Approval of this project, according to the DEIR, will add up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM), transporting engineered fill. Thus, over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road. Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.).

As stated in the DEIR there will be significant and unavoidable impacts to traffic, most notably in the following areas: Bennett Road at Tinloy Street, Brunswick Road at Idaho Maryland Road, Brunswick Road at Whispering Pines Lane, Brunswick Road at E. Bennett Road, and Brunswick Road at SR 174. Some of these intersections are already poorly designed and dangerous intersections with accidents occurring on a regular basis. Approval of this project without adequately addressing and mitigating the impact to local citizens driving these roadways is unacceptable. In addition to the traffic impacts, running an industrial mining operation utilizing trucks in a neighborhood means additional noise, dust, vibrations to the citizens in these neighborhoods, facts the DEIR does not adequately address.

When the Mine is in operation the 400-600 "local" employees Rise Gold claims they will

employ will add further traffic to these roadways. We know these workers will not be living in Grass Valley, as the lack of affordable housing is already an issue for our community. So, that will mean an additional 400-600 cars on the already identified significant and unavoidable impacts to traffic, a key factor the DEIR failed to adequately address.

In addition to these already identified issues, what concerns me even more is the impact to evacuation routes in the event of fire. As stated in the DEIR, "According to CAL FIRE, relatively few larger wildfires have occurred within the region surrounding the project sites over the past three years". I disagree with this statement as I am sure those that lost their homes in the River Fire and the Jones Fire also would. In addition to these fires, the DEIR needs to address the potential environmental impact the Whispering Pines Fire, would have created if this project was in operation. In the DEIR there are some statements that we could "ask" the mine operations to discontinue the truck routes in the event of a fire. Ask?

Ind 607-2

As we are in another year of drought and increased fire danger, I find it unconscionable that the County would approve a project that would that would add significant and unavoidable impacts to traffic along the evacuation routes people would need to use. The DEIR seems to imply there are other evacuation routes, but I assure you, our current residents and 400-600 additional vehicles and large trucks will be using Brunswick to get to 174 and 49/20, and Brunswick will be at a standstill trying to get on 174. This is a significant and real potential disaster for this community.

In the 20 years we have lived in this community, that we love, I have served for 8 years as a Board member and President of the the Chicago Park School District and 8 years as a member of the Board of the Center for the Arts. We are significant financial donors to numerous local non profit organizations. If this project is approved, we will sell our Cedar Ridge home and regrettably move out of the area, where we will contribute our time and substantial financial charitable contributions to our new community.

Ind 607-3

Respectfully,

Nancy Dewey

13035 Somerset Drive
Grass Valley, CA 95945
nancy@deweys.org

INDIVIDUAL LETTER 607: NANCY DEWEY

Response to Comment Ind 607-1

The commenter incorrectly identifies the significant and unavoidable traffic impacts identified in the DEIR. Chapter 4.12, Transportation, concludes that the project's traffic impacts would be less than significant after mitigation, with the exception of traffic at the SR 174 and Brunswick Road intersection and the northbound left lane at the Brunswick Road and Sutton Way intersection, which would be significant and unavoidable due to the uncertainty of the mitigation measures identified in the DEIR.

For the commenter's general concerns about noise and vibration, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Dust effects from mining operations are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

The commenter also expresses concern regarding employee trips. Employee trips are already accounted for in the transportation analysis presented in Chapter 4.12 of the DEIR. See Table 4.12-8, Project Trip Generation.

Response to Comment Ind 607-2

Regarding the commenter's evacuation route concerns, please see Master Response 5 – Evacuation Zones. Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 607-3

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 608

From: Nancy Dewey
To: Idaho MMEIR
Cc: bdofsupervisors
Subject: Oppose Idaho-Maryland Mine Project
Date: Sunday, March 20, 2022 7:28:52 PM

Dist 3

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

via email: Idaho.MMEIR@co.nevada.ca.us

Mr Kelly,

First, thank you for your service to our community. I know there are strong feelings about a lot of current issues and some in our community are not treating our elected officials and public agency employees with the respect they deserve. I am strongly opposed to the Idaho-Maryland Mine Project for a multitude of reasons and have significant concerns about the findings and inadequacies of the Draft Environmental Impact Report (DEIR). I will focus on one area of concern in this letter, traffic impacts. I hope my sincere and strongly held beliefs about the negative impacts of this proposed project are presented in a constructive manner.

Ind 608-1

Approval of this project, according to the DEIR, will add up to a maximum of 100 round trips per day and an average of 50 round trips per day, over a 16-hour period (6:00 AM to 10:00 PM), transporting engineered fill. Thus, over the life of the project, up to 118 haul truck round trips would occur on Brunswick Road during the hours from 6:00 AM to 10:00 PM, seven days a week. On an hourly basis, this equates to approximately 7.4 haul truck round trips per hour on Brunswick Road. Up to 18 additional truck trips could occur per day for various operations (gold concentrate shipping, materials deliveries, etc.).

As stated in the DEIR there will be significant and unavoidable impacts to traffic, most notably in the following areas: Bennett Road at Tinloy Street, Brunswick Road at Idaho Maryland Road, Brunswick Road at Whispering Pines Lane, Brunswick Road at E. Bennett Road, and Brunswick Road at SR 174. Some of these intersections are already poorly designed and dangerous intersections with accidents occurring on a regular basis. Approval of this project without adequately addressing and mitigating the impact to local citizens driving these roadways is unacceptable. In addition to the traffic impacts, running an industrial mining operation utilizing trucks in a neighborhood means additional noise, dust, vibrations to the citizens in these neighborhoods, facts the DEIR does not adequately address.

When the Mine is in operation the 400-600 "local" employees Rise Gold claims they will

employ will add further traffic to these roadways. We know these workers will not be living in Grass Valley, as the lack of affordable housing is already an issue for our community. So, that will mean an additional 400-600 cars on the already identified significant and unavoidable impacts to traffic, a key factor the DEIR failed to adequately address.

Ind 608-2

In addition to these already identified issues, what concerns me even more is the impact to evacuation routes in the event of fire. As stated in the DEIR, "According to CAL FIRE, relatively few larger wildfires have occurred within the region surrounding the project sites over the past three years". I disagree with this statement as I am sure those that lost their homes in the River Fire and the Jones Fire also would. In addition to these fires, the DEIR needs to address the potential environmental impact the Whispering Pines Fire, would have created if this project was in operation. In the DEIR there are some statements that we could "ask" the mine operations to discontinue the truck routes in the event of a fire. Ask?

As we are in another year of drought and increased fire danger, I find it unconscionable that the County would approve a project that would that would add significant and unavoidable impacts to traffic along the evacuation routes people would need to use. The DEIR seems to imply there are other evacuation routes, but I assure you, our current residents and 400-600 additional vehicles and large trucks will be using Brunswick to get to 174 and 49/20, and Brunswick will be at a standstill trying to get on 174. This is a significant and real potential disaster for this community.

Ind 608-3

In the 20 years we have lived in this community, that we love, I have served for 8 years as a Board member and President of the the Chicago Park School District and 8 years as a member of the Board of the Center for the Arts. We are significant financial donors to numerous local non profit organizations. If this project is approved, we will sell our Cedar Ridge home and regrettably move out of the area, where we will contribute our time and substantial financial charitable contributions to our new community.

Respectfully,

Nancy Dewey

13035 Somerset Drive
Grass Valley, CA 95945
nancy@deweys.org

INDIVIDUAL LETTER 608: NANCY DEWEY

Response to Comment Ind 608-1
Please see Response to Comment Ind 607-1.

Response to Comment Ind 608-2
Please see Response to Comment Ind 607-2.

Response to Comment Ind 608-3
Please see Response to Comment Ind 607-3.

Individual Letter 609

From: Nancy Henson <nancylmh1@gmail.com>
Sent: Monday, April 4, 2022 12:28 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR comments

Ind 609-1



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Respectfully submitted,
Nancy Henson
14148 Grizzly Hill Road
Nevada City, CA 95959

INDIVIDUAL LETTER 609: NANCY HENSON

Response to Comment Ind 609-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 610

From: Nancy Piette <nancy.piette4@gmail.com>
Sent: Saturday, April 2, 2022 4:39 PM
To: Matt Kelley
Subject: DEIR comments

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Dear Mr. Kelley,

I have been a resident in the Grass Valley/Nevada City area for about 40 years and raised my two children here. I was an employee of the Nevada County Public Health Department for 22 years and remain interested and concerned about the health and welfare of all Nevada County residents.

I have comments about two areas of the DEIR about the proposed re-opening of the Idaho-Maryland Mine. The first area is that of **Hazardous Materials**. Chapter 4.7 page 35 states that **significant impacts are possible** for release of arsenic or other harmful chemicals. I think proposed mitigation measures are inadequate in that no procedures are stated regarding supervision of Rise Gold employees if they encounter potentially hazardous soil. The mitigation measure (4.7-2(b) lays responsibility squarely on Rise Gold workers, stating that "**work shall stop**" in "an area of possible contamination" if "unidentified or suspected contaminated soil evidenced by..."

Ind 610-1

Would Rise Gold employees be given any **training** on how to recognize potentially hazardous soils or materials? There is no mention of this in the DEIR. Would a site **supervisor be observing** onsite as workers uncover new areas of soil**? I am concerned that depending on Rise Gold employees to "stop work" is an unreasonable and inadequate mitigation measure.** Stopping work and calling in a Registered Environmental Assessor (REA) or other "qualified assessor" may be unlikely unless employees are conscientiously supervised. And how inconvenient would it be to call in an REA? Very inconvenient. So a "qualified assessor" would likely be used, if any, and how "qualified" would that person be in assessing toxic risk?

Rise Gold's CEO does not have a good track record in containing hazardous materials, based on his toxic waste spill in B.C., Canada in 2015. **Should we trust him and his employees to identify toxic materials in Nevada County?**

I am also concerned about **Air Quality (AQ)** monitoring. I noted that the DEIR is inaccurate in stating that construction would be occurring from Jan.-Dec. 2021**, last year**. I also noted that **air quality impacts could be significant**. Given that, I think mitigation measures are **inadequate** because they do not state a **minimum frequency** of AQ monitoring. Page 84, Chapter 4.7 states that NSAQMD "may require air quality monitoring at any time", but **how often** would monitoring occur? Once a year? Once a month? Since AQ impacts could be significant, an appropriate monitoring frequency should be stated in the final EIR and tracked carefully by a stated regulatory agency.

Ind 610-2

1

I appreciate this opportunity to comment on the DEIR, and I thank you for your diligent work on this document.

Sincerely,

Nancy C. Piette

Registered Dietitian, Master of Science, Public Health

INDIVIDUAL LETTER 610: NANCY PIETTE

Response to Comment Ind 610-1

The commenter expresses concern regarding arsenic or other harmful chemicals at the project site and states that the mitigation measures to address Impact 4.7-2 are inadequate. Primarily, the commenter questions whether on-site employees would be adequately trained in order to recognize hazardous materials and take appropriate actions. The commenter also raises concerns regarding past projects of the Project Applicant's CEO.

Regarding training, the federal Occupational and Safety Health Act (OSH) requires hazardous materials operators to receive an initial 40 hours of training, as well as an annual eight-hour refresher course, which includes training regarding personal safety, hazardous materials storage and handling, and emergency response. (DEIR, p. 4.7-12.) Additionally, Mitigation Measure 4.7-2(a) requires the project contractor, in the event that the portion of the Brunswick Site containing arsenic is disturbed, to retain a Certified Industrial Hygienist to develop specific handling procedures for mine waste and dust mitigation. (DEIR, p. 4.7-35.)

Comments regarding past projects of the Project Applicant's CEO are not relevant to the adequacy of the DEIR; however, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 610-2

The commenter is concerned about air quality monitoring because mitigation measures do not state a minimum frequency of monitoring. The commenter appears to be referencing Mitigation Measure 4.3-2 on page 4.3-82 of the DEIR, which requires an Asbestos Dust Mitigation Plan (ADMP). As stated in the mitigation measure, air monitoring requirements and frequency of air monitoring are provided in the approved ADMP and the NSAQMD may require air monitoring at any time. The minimum frequency of air sampling is not known at this time and not required for the analysis of the DEIR. Notably, compliance with the California Air Resources Board Airborne Toxic Control Measures for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

The starting year presumed in the Air Quality study has already passed but that does not affect the analysis of the DEIR. The project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities. Please see Master Response 24 - Project Construction Schedule.

Individual Letter 611



Feb. 20, 2022

Matt Kelley, Senior Planner,

After reviewing the Draft Environmental Impact Report, I am publicly voicing my opposition to the re-opening of the Mine Project.

Ind 611-1

I have lived on Greenhorn Road since 2004. My husband and I intend to live out our final years on the beautiful 40 acres we own. We came to this property, to enjoy the peace, beauty and quality of life we have created for ourselves. This quality of life will come to an end for us if the mine is allowed to reopen in our rural residential area.

Ind 611-2

There have been 83 negative impacts illuminated by the report, with many ***significant*** enough to stop the project by themselves. We came here to retire and have our custom home be our final stop before turning over the property to our children who will inherit at our demise. If the mine is re-opened, property values will decrease up to 20%. *Who wants to live next to a heavy, extractive, toxic industry?* There are hundreds of my neighbors who will be similarly affected by heavy industry in our midst. Changing the zoning from light industry to heavy would be criminal in the midst of so many people living in the area.

Ind 611-3

Our main concerns are:

- Our water wells will be further dewatered (already our extreme climate change has dried up 3 of our 5 wells), and the likelihood of toxic pollutants used in mining will be dumped into South Fork Wolf Creek destroying the ecosystem.

Ind 611-4

- Our air quality will be further degraded (already we have poor air quality rating due to our topography and relation to smog from the valley). The mining project would spew clouds of airborne toxic mining dust and toxic diesel exhaust from heavy trucking. This is an extreme risk to our health.

Ind 611-5

- The noise of operations at the mine will destroy our peace. At our age, we relish the gift of the sounds of trees soughing and the birds singing.

Ind 611-6

- Traffic will be hazardous to negotiate with so many heavy trucking trips on our rural roads to the Centennial site to dump waste rock. Greenhorn Road is a one way in, and one way out road, with hundreds of residents along (and off) it's 7 miles. In a wildfire evacuation, the risk of a deadly outcome for the hundreds of residents along the 7 miles of Greenhorn road would be increased if big trucks were clogging the roadway.

Ind 611-7

- It does not make sense to reopen a mine that has been closed for 66 years; while in the meantime, our population has grown into the area that has become residential with *hundreds of people living on top* of old, toxic, best left alone, 2585 acres of Rise Gold's underground mineral rights.

Ind 611-8

I believe it is more important to our future health as a community ***to not allow hard rock mining***, which is the single largest source of toxic waste in the United States, back into our now beautiful area that is a tourist destination and desirable place to live.

Sincerely,
Nancy Rojo & Armando D. Rojo

Nancy Rojo
17150 Greenhorn Road, Grass Valley, CA 95945 (Mailing address: P.O. Box 47, Cedar Ridge, CA 95924)
1-530-274-7336
email to: nancytrojo@gmail.com

INDIVIDUAL LETTER 611: NANCY ROJO

Response to Comment Ind 611-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 611-2
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 611-3
For concerns related to water wells and climate change, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. For concerns related to pollutants being dumped into South Fork Wolf Creek, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 611-4
The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 611-5
Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.



Response to Comment Ind 611-6

Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 611-7

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding the commenter's reference to the 2,585-acre mineral rights boundary, it is recommended to review Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 611-8

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 612

From: Nancy Taylor Rojo
To: bdofsupervisors; Heidi Hall; Ed Scofield; Dan Miller; Sue Hoek; Hardy Bullock
Subject: Comment to the DEIR
Date: Tuesday, February 22, 2022 7:46:32 AM

Dist 1

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Ind 612-1

After reviewing the Draft Environmental Impact Report, I am publicly voicing my opposition to the re-opening of the Mine Project.

I have lived on Greenhorn Road since 2004. My husband and I intend to live out our final years on the beautiful 40 acres we own. We came to this property, to enjoy the peace, beauty and quality of life we have created for ourselves. This quality of life will come to an end for us if the mine is allowed to reopen in our rural residential area.

Ind 612-2

There have been 83 negative impacts illuminated by the report, with many ***significant*** enough to stop the project by themselves. We came here to retire and have our custom home be our final stop before turning over the property to our children who will inherit at our demise. If the mine is re-opened, property values will decrease up to 20%. *Who wants to live next to a heavy, extractive, toxic industry?* There are hundreds of my neighbors who will be similarly affected by heavy industry in our midst. Changing the zoning from light industry to heavy would be criminal in the midst of so many people living in the area.

Ind 612-3

Our main concerns are:

- Our water wells will be further dewatered (already our extreme climate change has dried up 3 of our 5 wells), and the likelihood of toxic pollutants used in mining will be dumped into South Fork Wolf Creek destroying the ecosystem.

Ind 612-4

- Our air quality will be further degraded (already we have poor air quality rating due to our topography and relation to smog from the valley). The mining project would spew clouds of airborne toxic mining dust and toxic diesel exhaust from heavy trucking. This is an extreme risk to our health.

Ind 612-5

- The noise of operations at the mine will destroy our peace. At our age, we relish the gift of the sounds of trees soughing and the birds singing.

Ind 612-6

- Traffic will be hazardous to negotiate with so many heavy trucking trips on our rural roads to the Centennial site to dump waste rock. Greenhorn Road is a one way in, and one way out road, with hundreds of residents along (and off) it's 7 miles. In a wildfire evacuation, the risk of a deadly outcome for the hundreds of residents along the 7 miles of Greenhorn road would be increased if big trucks were clogging the roadway.

Ind 6112-7

- It does not make sense to reopen a mine that has been closed for 66 years; while in the meantime, our population has grown into the area that has become residential with *hundreds of people living on top* of old, toxic, best left alone, 2585 acres of Rise Gold's underground mineral rights.

Ind 612-8

I believe it is more important to our future health as a community ***to not allow hard rock***

mining, which is the single largest source of toxic waste in the United States, back into our now beautiful area that is a tourist destination and desirable place to live.

Sincerely,
Nancy Rojo
17150 Greenhorn Road, Grass Valley, CA 95945 (Mailing address: P.O. Box 47, Cedar Ridge, CA 95924)
1-530-274-7336
email to: nancytrojo@gmail.com

INDIVIDUAL LETTER 612: NANCY ROJO

Response to Comment Ind 612-1
Please see Response to Comment Ind 611-1.

Response to Comment Ind 612-2
Please see Response to Comment Ind 611-2.

Response to Comment Ind 612-3
Please see Response to Comment Ind 611-3.

Response to Comment Ind 612-4
Please see Response to Comment Ind 611-4.

Response to Comment Ind 612-5
Please see Response to Comment Ind 611-5.

Response to Comment Ind 612-6
Please see Response to Comment Ind 611-6.

Response to Comment Ind 612-7
Please see Response to Comment Ind 611-7.

Response to Comment Ind 612-8
Please see Response to Comment Ind 611-8.

Individual Letter 613

From: Nancy Shanteau <nancy.shanteau@gmail.com>
Sent: Saturday, April 2, 2022 7:37 PM
To: deircommrnts@cea nc.org; Idaho MMEIR
Subject: My opposition to the mine

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To whom it concerns:

The evidence of mining harms to a place surround us.

Ind 613-1 Mercury poisoning, sink holes, toxic waste byproducts, damage to the ecosystem and all within it.

Just now we're all dealing with the destruction of bird habitats during nesting season — big corporations who funnel profits out of the county don't live here and won't care when those problems start coming home. But we'll be living with them. Every day, and every night.

There are big problems with the environmental impact report including:

Ind 613-2 The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

Ind 613-3 Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

Ind 613-4 Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".

Ind 613-5 Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 613-6 Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 613-7 The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

Ind 613-8 Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.

Ind 613-9 Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

Ind 613-10 The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

1

Ind 613-11

Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.

Our peace is priceless.

We can invest in jobs in this county in many more fruitful ways. We have a flourishing tech television and broadcast industry, and could create a jobs magnet by offering TV tech education locally. Just an example of the kind of smart investment that pays long-term returns.

Ind 613-12

Let's put our heads together and figure out better options, ones that build a future for us, instead of destroying our present.

Say no and vote no on the Idaho Maryland mine.

Our future is at stake.

Nancy Shanteau
Grass Valley resident and local business owner.

--
Nancy Shanteau
Writing, Bodywork, Life, Work, Relationships
Skills for Change and Somatic Coach, Teacher & Coach Educator
web: www.nancyshanteau.com
join my mailing list: http://tinyurl.com/h3njj8q
Find me on Patreon: https://www.patreon.com/nancyshanteau
tel: 530-273-5170
cel: 530-205-8440

--
Nancy Shanteau
Writing, Bodywork, Life, Work, Relationships
Skills for Change and Somatic Coach, Teacher & Coach Educator
web: www.nancyshanteau.com
join my mailing list: http://tinyurl.com/h3njj8q
Find me on Patreon: https://www.patreon.com/nancyshanteau
tel: 530-273-5170
cel: 530-205-8440

INDIVIDUAL LETTER 613: NANCY SHANTEAU

Response to Comment Ind 613-1

The commenter states that historical mining in the area has led to harmful environmental impacts and that community is currently dealing with the destruction of bird habitats. Note that the DEIR clearly states that mercury would not be used during mineral processing (DEIR, p. 3-25).

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 613-2

The commenter states that the groundwater model has fundamental flaws and assumptions but does not provide specific reasons and only includes vague references to the "initial start point" and "baseline data assumptions."

The DEIR examined groundwater-related impacts extensively. That analysis may be reviewed at DEIR Chapter 4.8 – Hydrology and Water Quality, the Groundwater Hydrology and Water Quality Analysis (Appendix K.2), the Groundwater Model Report (Appendix K.3), the Preliminary Drainage Analysis (Appendix K.5), and the West Yost Peer Review (Appendix K.7.) The commenter is also directed to Master Response 13 – Historic Hydrogeologic Assessments, and Master Response 14 – Adequacy of Groundwater Model.

Response to Comment Ind 613-3

The commenter states that the DEIR should include more comprehensive management of asbestos but the commenter does not explain how the DEIR is inadequate in this regard. The commenter is directed to Chapter 4.3 of the DEIR which analyzes asbestos in the context of air quality impacts and Master Response 4 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 613-4

The commenter states that the DEIR excluded elements that would cause the project to exceed the GHG emissions threshold, but does not explain what elements were excluded. A net zero threshold for GHG emissions is not required for the project. Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 613-5

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 613-6

The commenter states that the DEIR does not discuss construction time estimates which impacts the noise, traffic, and air analyses. Please see Master Response 24 – Project Construction Schedule. As discussed in Master Response 24, the project assumes a compressed construction schedule where many activities overlap to provide the most conservative estimate of air quality, traffic, noise and other impacts. An increase in the duration of construction activities and/or the completion of activities sequentially would serve to reduce estimates of environmental impacts in many areas. As such, the approach taken by the DEIR overestimates impacts as compared to a longer construction schedule with less overlapping activities.

Response to Comment Ind 613-7

Please see Responses to Comments Grp 21-130 and Grp 21-131.

Response to Comment Ind 613-8

The commenter states that the DEIR must discuss the potential for moisture cloud plumes and associated impacts to aesthetics or air traffic hazards. Moisture clouds from mine ventilation are not expected to occur and would not cause air traffic hazards or change the significance conclusion of the DEIR for aesthetics. Please see Response to Comment Grp 7-95.

Response to Comment Ind 613-9

Please see Response to Comment Grp 21-144.

Response to Comment Ind 613-10

The commenter states that the DEIR does not demonstrate that the impacts to biological and aquatic responses would be less than significant, but fails to provide specific reasons why the DEIR is inadequate. The DEIR discusses impacts to biological resources in Chapter 4.4 and impacts to hydrology and water quality in Chapter 4.8.

Response to Comment Ind 613-11

The commenter states that meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions. The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA**.**

Response to Comment Ind 613-12

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 614

From: Natalie Wengryn <waxgoddess@yahoo.com>
Sent: Monday, April 4, 2022 8:57 PM
To: Idaho MMEIR
Subject: To whom it may concern

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To whom it may concern,

I have had many years ,leading up to this point, of watching this proposed mine project evolve. I live two miles up Geenhorn Road. My mothers preschool she ran for over 30 years is on East Bennett. Going back in time, to the point when Mr Mossman was just investigating or "looking" in just one of the shafts on East Bennett several years ago, it was apparent to me that this wanted to be somewhat discreet. The tall barrier walls (not being able to see what was going on behind them) struck an interest. I take East Bennett into town every single time, I would drive by there in the morning, mid day and sometimes at midnight or later and the work never stopped. Talking to those homeowners who lived near that site, they informed me what was going on and told me that their homes shook 24 hours a day. Knowing what I know now, I wonder where the contaminated water and debris went those many months of being excreted... and was it treated properly before doing so?

Ind 614-1

I am a simple woman. I never did well in science, but I do feel like I am pretty streetsmart and my gut is telling me something just isn't right here. I am a proud Nevada County native myself, born and raised here I know what this county was built on. My husband's great grandfather was a Nor-Star miner and died in that mine. His grandfather had to take over their dairy farm at a very young age and become a miner himself to support his family. Looking at the big picture, it is apparent to me that it is always the man with the money sitting back reaping all the benefits while everyone else around him puts their lives at risk. I am not going to sit here and copy and paste the same questions everybody else is sending to you. When we first bought our home 12 years ago, it was never disclosed to me (or any of my neighbors or friends that live even closer to the site) that it could potentially re-open. So the fact that I NOW have to disclose this to any potential buyer of MY home, making the value of MY home drop... makes me livid. The fact it could affect my water, quality of life.... We already have to be so careful with the water we already have here from the mining that happened so many years ago. I have filtration systems and do not let my children or family drink any of the water from the tap. I haven't in any home we have lived in in Nevada County knowing what I know. Living so close this should have been disclosed from the very beginning of every home sale or kept a commercial zone so many years ago. Living within 2 miles of the actual site, and only 1000 feet away from where the shafts end, my biggest concern is the water table. We do not have pipe treated water and just had to

Ind 614-2

drill a whole new well. It is baffling they think it will only affect the 30 homes on E Bennett, when the shafts go for miles and miles. When I read information about this project it seems as though they have to dig deeper to get to the actual gold that hasn't been mined. If that is the case, knowing how shafts tunnel farther "out" not "down" concerns me. If that is the case, wouldn't the mineral rights go beyond the thousands of acres? For an 80 year project where will they be in 10, 20, 30 years? I have also heard these horror stories of sinkholes and cave in shafts in Colfax and surrounding areas here. It

Ind 614-3 seems to me going and disturbing extremely old mine-shafts that have been sitting full of rain and our well water for the last 70 years ... that Just disturbing it would cause vibrations that could do this? Are they going to re build the whole infrastructure down there? I wish that all of these worries I have could be explained to the ACTUAL PEOPLE living in such a close range, so that we don't go down these

Ind 614-4 rabbit holes of worry. Like really, lay it all out on the table to those living right there. I shouldn't have to dig deep into the internet when this shit is happening in my backyard and so close to affect so many quality of lives. This information should be GIVEN to us freely, not some propaganda bandwagon newsletter to "stimulate the economy and bring more jobs" ... that's it, really?!

Having a small business here myself I know that this economy is stimulated and people move here every day with money. Wether retired or working remotely from the city, or growing marijuana. There are so many jobs here ready to hire, so that is a huge cop out to me as well. I really and honestly feel like nobody is being our advocate and it scares me. Yes this will affect this whole county

Ind 614-5 but living so extremely close I am just baffled how this has been handled. Everyone I talk to seems shocked... it's up to five board of supervisors? Its self regulated? Oh that could never be put through!? It's not voted on?! And the further I read it doesn't put my mind at ease. Filling the shafts with some kind of man-made paste after being done? Where does the water go after that? What is in this paste can at leach into the water? Is that even environmentally safe? Having to keep sprinklers on the

Ind 614-6 property to keep the amount of dust down does not match up with the fact they're saying it creates minimal dust. Watching and hearing I see him letting every nonprofit use this property, wood chipping and firewood programs, PG&E during the power outages and storms, buys the local fire department a brand new fire truck?! Silently donating to the widening project on 174... To me looks like "remember what I did for you". I could be wrong on some of these things and I would love to be

Ind 614-7 enlightened on this and how exactly this whole process will go down. There are so many facets to this topic, and every time I talk about it I am shocked that it is even on the table. It would be one thing if it was out in the middle of nowhere, but this is in a housing community, my hometown that I am so proud to say...up until this point. Have our backs, be our advocate I am begging you.

Sincerely,
Natalie Browning

INDIVIDUAL LETTER 614: NATALIE BROWNING

Response to Comment Ind 614-1
The comment does not address the adequacy of the DEIR, but rather expresses concerns related to already completed exploratory drilling. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 614-2
Regarding the commenter's groundwater concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding quality of life concerns, which are outside the scope of CEQA, please see Master Responses 1 and 2. Please also refer to Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 614-3
For sink hole concerns, please see Master Response 29 – Near Surface Workings.

Response to Comment Ind 614-4
The existing underground workings would be utilized to the maximum extent practicable. As discussed in the Project Description chapter of the DEIR (chapter 3), new underground tunnels and raises would be created as necessary to access gold-quartz veins or provide the necessary underground infrastructure to transport rock and provide ventilation and escape routes. The location, size, and depth of new underground workings would depend on surface and underground drilling and mineral testing. New underground workings, except for the service shaft and new ventilation raise, would be below 500 feet of the ground surface.

Response to Comment Ind 614-5
The commenter expresses concerns related to the use of cemented paste backfill (CPB) in the underground mine. CPB is addressed in detail starting on page 4.8-46 of Chapter 4.8, Hydrology and Water Quality, of the DEIR.

Response to Comment Ind 614-6
The DEIR does not state that the project would create minimal dust. As discussed on page 4.3-65 of the DEIR, as part of implementation of APM-AQ-2, during construction, operation, and reclamation, all exposed soil surfaces would be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring during construction, operation, and reclamation to reduce surface fugitive dust emissions. In addition, as an alternative to watering, inactive soil piles would be covered to minimize wind erosion. Such measures would be implemented to reduce surface fugitive dust emissions.

Response to Comment Ind 614-7
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 615

From: Nathan Collins
To: BOS Public Comment
Subject: Idaho Maryland mine
Date: Friday, February 11, 2022 8:17:14 AM

Dist 3

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Ind 615-1

Hello,

I am a resident of grass valley and I wanted to say I am against re-opening the mine. The way forward for this county is not by going backwards in time. Not to mention the negative impacts to our air and water. We also do not need a significant amount of noise pollution to fill the air. Please do not reopen this mine. I can't believe we are talking about this in 2022, but here we are. Thank you for your time.

Ind 615-2

-Nate Collins

Sent from my iPhone

INDIVIDUAL LETTER 615: NATE COLLINS

Response to Comment Ind 615-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. Regarding the general air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Regarding the general water concerns, please see Chapter 4.8, Hydrology and Water Quality.

Response to Comment Ind 615-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns and opposition regarding the proposed project. Please see Master Response 1. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 616

TO: Matt Kelley, Senior Planner April 4, 2023
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
FROM: Nathan Helm-Burger, Scientist (MA Biological Psychology, MS Neuroscience)
12810 Woodpecker Way
Nevada City , CA 95959
Subject:
DEIR Comment on: AIR QUALITY AND GREENHOUSE GAS EMISSIONS ANALYSIS TECHNICAL REPORT FOR THE IDAHO-MARYLAND MINE PROJECT (IMMP)

""Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure". (page v, Air Quality and Greenhouse Gas Emissions Analysis Technical Report).

Re: I conclude that the most important impact is air pollution because it will endanger people many miles from the mine operations, just as wildfire smoke affects the whole region. While diesel exhaust will have unmitigable negative impacts, it is asbestos and silica that are most dangerous to us. Airborne asbestos can lead to cancer and eventual death.

Ind 616-1

The DEIR (Appendix E2) finds asbestos in about 32% of drill hole samples representing rock that will be brought to the surface. But, 19 drill holes providing 40 samples cannot represent 2,585 acres of mineral rights (1 sample per 65 acres). That's generalization from insufficient sampling—there's probably more.

Unfortunately, asbestos fibers are very small, approximately 0.5 microns. In this case, being sub-microscopic leads to harm: the asbestos cannot easily be filtered, can remain suspended a very long time in the air because , and penetrates deeply into our lungs.

The EPA's highest filter rating on the MERV scale is 16. This highest rated filter is only expected to filter out 75% of particles 0.3 to 1 microns, such as asbestos fibers. In other words, even using the highest quality industrial filter, it is possible that 25% of the asbestos will pass through. And even that level of filtration is far above what they could afford to do at that scale.Since it should be expected that more than 25% of the asbestos dust will escape mitigation entirely, their impact plan should include an analysis of the airborne spread of asbestos particles and expected dosage levels for the impacted communities.

Ind 616-2

The DEIR mitigations (4.3-2) treat asbestos as dust that can be kept out of the air by spraying water, washing vehicles, tarping the hauling trucks, etc. The proposed mitigations are copied from the CA Asbestos Airborne Toxic Control Measure which is for "visible dust emissions" -- there isn't any Asbestos Dust Mitigation Plan. Asbestos fibers are 1 millionth of a meter long, and can be harmful in quantities too small to be easily noticed in the hazing of the air. Mitigation intended for general rock dust is not sufficient or appropriate for asbestos fibers.

The DEIR does not contain an Asbestos Dust Mitigation Plan (ADMP) and therefore this vital part of mitigation cannot be used to determine DEIR adequacy. Thus, the DIER cannot be certified until action is taken. Quote: "Prior to the initiation of any clearing, grading, or

construction activities, Rise Grass Valley Inc. [sic] shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD)." This plan should be done before the project can be considered for approval.

Ind 616-3

"""Exposure of Sensitive Receptors: Project construction and operation activities would produce TAC emissions due to equipment, haul truck trips, and mining and soil movement. These emissions could result in elevated concentrations of TAC [Toxic Air Contaminants] emissions at nearby receptors, which could lead to an increase in the risk of cancer or other health impacts. In an abundance of caution, the health risk assessment conducted conservatively included emergency generator use based on Pacific Gas & Electric's (PG&E's) recent Public Safety Power Shutoffs during high winds for 24 hours per day, for up to 9 days per year, during construction and operations to reflect potential power outages. Potential cancer risk, as well as chronic and acute health risks would be less than significant without mitigation. However, implementation of MM-AQ-2 would further reduce health risk. Also, since asbestos was found in lab samples from the mine, an Asbestos Dust Mitigation Plan (MM-AQ-3) would be required to limit potential exposure."""

There are also other unaddressed issues such as the need for adequate testing of the 3 million pounds of rock excavated every day.

INDIVIDUAL LETTER 616: NATHAN HELM-BURGER

Response to Comment Ind 616-1

Diesel exhaust, silica, and asbestos have been analyzed in the Health Risk Assessment included in the DEIR and were found to be less than significant after mitigation. (see DEIR Impact 4.3-2.)

The commenter asserts that sampling for asbestos is insufficient. Please see Master Response 23 - Adequacy of Asbestos Sampling.

As stated on page 10 of Appendix E.2, ASHRAE Standard 52 MERV rating 16 specifies removal of greater than 95% of +0.3-micron particles. The particle size efficiency for particles sizes from 0.3 to 1.0 microns is greater than 75%. However, this fraction of particles size (0.3 to 1.0 micron) represents only a small portion of PM_{10} (10 micron) dust; therefore, 25% of asbestos fibers would not pass-through filtration as the commenter asserts. Small fibers of naturally occurring asbestos are also less likely to become airborne as they would be enclosed in dust particles and therefore not be counted as asbestos in an air sample. Please see Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 616-2

Small fibers of naturally occurring asbestos are also less likely to become airborne as they would be enclosed in dust particles and therefore not be counted as asbestos in an air sample. Please see Master Response 22 - Conservatism of Asbestos Assumptions.

The minimum requirements of the Asbestos Dust Mitigation Plan are provided in Mitigation Measure 4.3.2. This plan must be approved by the Northern Sierra Air Quality Management District before commencement of clearing or grubbing. The preparation and approval of the ADMP is not required during the CEQA process. ADMPs are typically prepared and approved after the CEQA process is complete. CEQA regulations state that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (see CCR § 15126.4.) Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The requirements for the ADMP are regulated by the Asbestos ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]). Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Ind 616-3

The commenter states that adequate testing of rock proposed to be excavated daily is unaddressed in the DEIR. However, testing of rock is thoroughly discussed and analyzed in the DEIR. See chapters 4.3, 4.6, and 4.8 of the DEIR.

Individual Letter 617

From: Nathan W.
To: bdofsupervisors
Subject: Please vote against the mine
Date: Friday, February 18, 2022 9:26:04 AM

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Ind 617-1

Hey there, wanted to share some thoughts on the mine. As a permanent resident of Nevada County I feel like the proposed mine is a bad idea.

The noise is discussed below. The impacts to air and water outlined in the EIR are unacceptable.

Ind 617-2

Also: The traffic analysis has some significant and unavoidable impacts that are reported as such in the DEIR. The traffic effects will be horrible for a long time. Also, at my initial glance, there is no clear analysis of the increase in traffic along segments of highway 49, which appears to be a flaw in the analysis.

Ind 617-3

The recently published DEIR for the proposed reopening of the old Idaho Maryland mine needs careful scrutiny.

Taken at face value, it concludes that the project would have no impact on the community that could not be mitigated.

The report was written by Raney Associates, a reputable firm chosen by the County, but it is based on language and measurement values provided to it by Rise Gold, and is correct in its conclusions only to the degree that that language and those measurement values are correct. Rise Gold has clearly chosen the language and measurement values to reflect the best possible outcome. Consequently, the real-life conditions would likely be quite different from the conclusions in the DEIR. Evaluating the level of impact should be based on worst case conditions, not best possible conditions.

Ind 617-4

Examples follow:
The ambient noise levels used in the study are currently four to five years old. Since the operations at issue will not start occurring for several years in the future after building construction and tunnel re-construction have been completed, these noise levels will likely not reflect the actual ambient noise at the time operations actually start, so the conclusions are questionable.

Ind 617-5

Noise is referenced with respect to 1) the source, and 2) the distance to "The Nearest Receptor". According to the County General Plan, Table 4.10-4 notes:

"[The noise] standards shall be measured only on property containing a noise sensitive land use as defined in Policy 9.8 and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at

the boundary of a recorded noise easement."
Rise Gold has chosen to measure and compute noise levels at what they call 'The nearest receptor', which in the case of the multi-acre parcels surrounding the mine operations, is the residence on the property, located at the greatest distance from the mine operations. To provide a realistic level of the impact on the property, those measurements and computations should be made at the property boundary, rather than the far end of those properties.

Ind 617-6

The study describes in detail how the sound mitigation by terrain and ground cover will contribute to the mitigation of sound in the local neighborhood, and relies on these values for its conclusions, but does not address the time when the engineered fill rises above the surrounding foliage and subjects the neighborhood to the direct, unobstructed noise of the fill and compacting operation. And incidentally, puts the subsequent use of the property (probably an industrial park) 93 feet higher than it now is, an altitude that will block the now unobstructed view of the surrounding parcels.

Ind 617-7

The DEIR also says: "Assuming a bulldozer, grader, excavator, front-end loader and compactor were operating concurrently at the Brunswick and Centennial Industrial Sites during site preparation, the combined noise exposure from the effective noise center of those operations would be 85 dBA Leq and 85 dB Lmax at a distance of 50 feet from the operations. However, the earthmoving equipment would be at various locations on the project sites rather than grouped in a small portion of the sites. To provide a conservative but reasonable assessment of project construction noise generation at the Brunswick and Centennial Industrial Sites, it was assumed that all of this equipment could be operating concurrently, but that the equipment would be spread out over the sites during the site clearing/construction operations. As a result, average noise levels were predicted for the Brunswick and Centennial Industrial Sites preparation activities assuming the noise sources were distributed throughout the sites, whereas maximum noise levels were predicted based on the closest proximity of the equipment to the sensitive receptor locations."

This combined sound level would also be true of the later fill and compact operations at the Centennial and Brunswick sites, therefor this seems is a false assumption, since these machines work jointly to accomplish their task, and would sometimes be operating in close proximity.

The DEIR is full of statements that use "it is assumed" and "is projected to be" as given fact in arriving at their conclusions.

These are red flags.

Ind 617-8

Additionally, the suggestion that both the average and the maximum sound levels would be the same, 85 dBa. says that the noise would be ongoing and continuous from 6AM to 10PM 7 days a week. Acceptable daytime noise levels of 75dBa would still be like standing next to a busy freeway. This is a major change to a quiet neighborhood, even if it lies within the County's defined noise limits.
Sound level calculations for the DEIR Tables are based on values for construction noise from The FHWA Roadway Construction Noise Model (RCNM), and shown in Table 4.10-10. These values differ substantially from sound levels shown in the Noise Navigator Sound Level Database, published by the University of Michigan Department of Environmental Health Science.

For example, where the RCNM shows Compactor and Front End Loader sound levels at

80dBa, the Noise Navigator chart lists them as 92 and 93dBa. An Earth Scraper in Table 4.10-10 is listed at 85dBa. In the Noise Navigator chart, it is 107 to 111 dBa. The noise level values on the Noise Navigator chart are twice and four to five times those on the RCNM chart used by Rise.

This calls into question the integrity of the analysis, since the actual machines to be used, the true sound levels of those machines, the real numbers of those machines in use at any given time, and their locations around the working locations at any given time are not actually known.

Ind 617-9

The DEIR describes a sound monitoring plan to evaluate the mitigation results of the operation. It says:
"If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed."

At this point, Rise will have sunk several million dollars into construction and development costs prior to starting operations. Are we to believe that they will just shut down until they can solve the problem, or will they continue to operate and pay fines levied as 'the cost of doing business'? These issues must be resolved before any permit is issued!
For those curious to know what the sound levels in your own lives are, there are several excellent sound meter apps available for your phone. Search 'noise level meter'. Although I have a professional sound level meter, I find the NOISH Sound Level Meter to be surprisingly accurate.

Because calculating cumulative sound levels involves dealing with the logarithmic dB scale, the online tool NOISE CALCULATOR may be handy:
[https://noisetools.net/decibelcalculator](https://noisetools.net/decibelcalculator...)
All the info above to be credited to Robert Hubbard

So for all these reasons including air water noise traffic and other issues I ask you to please vote against the mine.

Thanks.

INDIVIDUAL LETTER 617: NATHAN W

Response to Comment Ind 617-1

The commenter's opposition to the project is noted for the decision-makers. No specific comments are provided related to the adequacy of the DEIR and no further response is warranted. Please see Master Response 1.

Response to Comment Ind 617-2

The commenter references the project's anticipated significant and unavoidable impacts related to traffic. The commenter's opposition to these impacts is noted for the decisionmakers. Regarding the supposed increase in traffic along segments of Highway 49 and where to find it in the DEIR; as stated in the DEIR, the quality of traffic flow is typically governed by the operation of major intersections and the daily volume of traffic along the roadways. (DEIR 4.12-1.) Many of the Study Roadway Segments either directly connect to SR 49 or provide access to SR 49. As explained on page 4.12-16 and 4.12-17, while levels of service were used to demonstrate County roadway impacts consistent with the General Plan, CEQA requires a Vehicle Miles Traveled approach, accounting for the number of vehicle trips generated and the length or distance of those trips. This includes both commuting employees, fill trucks and other vehicles using VMT as the primary metric used to identify transportation impacts under CEQA. (DEIR 4.12-28.) Table 4.12-9 details the Project Trip Distribution on every route, including SR 49 for both average daily trips and maximum daily trips for the Brunswick and Centennial Industrial Sites for employee traffic, engineered fill trucks and other vehicles.

Response to Comment Ind 617-3

Commenter questions the accuracy of the data used for the DEIR. Although Bollard Acoustical Consultants, Inc. (BAC) has prepared numerous CEQA-level DEIR noise analyses directly for Raney over the years, the commenter is correct that the noise study prepared for this project by BAC was completed under contract with the applicant, not directly for Raney. However, in such cases it is common practice for the EIR preparer (Raney), to retain a qualified, third-party, consulting firm to conduct a thorough peer review of technical studies provided directly by the applicant. For this project, Raney retained Saxelby Acoustics to conduct such a peer review of BAC's noise study. The independent peer review is described on page 4.10-26 of the DEIR. The Saxelby peer review identified areas of the original noise study where additional detail or analysis was recommended. The noise study was revised in response to the peer review comments and suggestions, and the revised noise study was reviewed again by Saxelby Acoustics and determined to be adequate.

This comment is incorrect as all ambient noise level data collected for this project was reported without alteration and represent actual baseline ambient conditions at the nearest sensitive receptors to the noise-generating areas of the project. In addition, all assumptions regarding proposed operations and the noise-generation of those operations were clearly presented in the DEIR noise study (see DEIR Appendix L). Because the project would be conditioned to require extensive noise-compliance testing upon project start-up and thereafter, and required to implement additional sound control measures if the applicable noise standards are exceeded, utilizing unrealistic or understated assumptions to assess potential noise impacts for project noise sources would be counter-productive. CEQA does not require evaluation of absolute worst-case conditions or worst-case scenarios. If this were the case, all new residential developments within the State of California would be required to implement extensive noise mitigation measures (i.e., very tall sound walls around neighborhoods), for atypical noise conditions such as the passage of a very loud motorcycle group adjacent to a proposed residential development on a Sunday

afternoon, for example. Similarly, CEQA studies should also not be prepared using best-case conditions. An evaluation of the typical noise generation of the project is required, not absolute worst-case or best-case conditions. For this project, the goal was to identify noise impacts associated with typical operations using reasonably conservative assumptions.

Response to Comment Ind 617-4

The commenter states that the noise data is too old to use. As the CEQA Guidelines make clear, ordinarily the appropriate baseline will be the actual environmental conditions existing at the time of the Notice of Preparation. The noise studies in question were conducted over time to give complete information leading up to the Notice of Preparation, which was publicly issued on July 17, 2020. Given the exponential nature of the decibel scale, a considerable change in traffic volume is required prior to an appreciable change in ambient noise conditions occurring. Specifically, a doubling of traffic volume is required to achieve a 3 dB change in ambient conditions. Because traffic volumes rarely double within the span of 20 years, and because the baseline ambient noise environment in the project vicinity is defined almost exclusively by local traffic, minor changes in traffic volumes in the past 4-5 years would result in negligible changes in ambient noise conditions. It should be noted that the evaluation of the project's noise impacts is directly related to baseline ambient conditions. As a result, comparison of project's noise generation against a lower ambient condition provides the greatest protection for noise-sensitive receptors than comparison of project noise generation against a higher ambient condition. Although no substantive changes in ambient conditions are believed to have occurred since the completion of the ambient surveys for this project, had such minor changes occurred the ambient data used to establish the project standards of significance in the project DEIR would result in a conservative assessment of the project's noise impacts.

Response to Comment Ind 617-5

The commenter suggests noise monitoring at the property's edge instead of at the nearest receptor as suggested by the DEIR and the County General Plan. DEIR Table 4.10-4 was included as Table 5 in the noise analysis prepared by BAC for the project (DEIR Appendix L). As a result, the noise study preparers were familiar with the specific requirements of the County's General Plan Noise Element. The intent of the noise study was to evaluate potential noise impacts only at properties containing noise-sensitive land uses and at locations on those properties where noise-sensitivity actually exists, not at the extreme edge of the property containing the noise-sensitive use. Nonetheless, Figure 4.10-2 of the DEIR clearly indicates that the receptors evaluated in this study are very close to the Brunswick site boundaries, not at the "far end" of the properties as asserted by the commenter. Two exceptions occurred at Receptors 1 and 2 located near the Centennial Site where the residences are set back from Idaho-Maryland Road. Had the receptors on these properties been placed at the southern boundary of the sites, immediately adjacent to Idaho-Maryland Road, ambient conditions for those receptor locations would have been substantially higher. Because the noise standards are tied to ambient conditions, the result of locating the receptors at the south end of those properties would be much higher standards of significance for Receptors 1 and 2. The higher predicted noise levels associated with the project (due to the closer proximity of the receptors to the Centennial site), would have been more than offset by the significantly higher ambient conditions at the locations adjacent to the roadway. As a result, the finding of a less than significant noise impact at those receptors would not have changed.

Response to Comment Ind 617-6

Commenter suggests that an analysis was not made of the engineered fill at elevation later in the project timeline. On the contrary, the ultimate elevations of the engineered fill areas were included

in the three-dimensional noise modelling conducted for the environmental noise analysis, as described on page 6, last paragraph, of the Noise and Vibration Analysis. As a result, the condition referenced in this comment was accounted for in the DEIR impact assessment.

Response to Comment Ind 617-7

The commenter questions the adequacy of the County's defined noise limits and ordinance and the DEIR's use of scientific modeling. Because maximum noise levels typically result when equipment is operating at the nearest positions to sensitive receptors, the noise evaluation prepared for this project appropriately analyzed impacts relative to maximum (Lmax) noise level standards while the equipment would be operating at the closest positions relative to residences. However, given the variability of the locations of mobile equipment while operating on the sites, average (Leq) noise levels associated with the operations of such equipment are similarly variable. As a result, an evaluation of potential noise impacts conducted by placing all of the equipment at the closest positions to the nearest residences would be both atypical and would result in overstatement of project's average noise generation. While it is true that heavy equipment will sometimes operate in close proximity to the engineered fill boundaries, it would be incorrect to assume that all of the on-site heavy equipment would be simultaneously operating at the extreme edges of the site nearest the sensitive receptors. As mentioned above, CEQA does not require analysis of a worst-case scenario.

It is both a necessity and common practice to conduct modelling of a project's likely noise generation prior to the commencement of operations at a proposed project site. This is because those operations and equipment used to conduct those operations would not be operating until such time as the project is approved and operations at the site commence. As a result, it is necessary to utilize both reasonable and appropriate assumptions in that modelling. Furthermore, by virtue of the fact that project noise levels are modelled, the results are, in fact, "projected". The authors of the DEIR noise analysis have modelled the potential noise impacts associated with projects for over 30 years, including multiple EIRs which have regularly and routinely been certified by the local jurisdiction as being adequate per CEQA guidelines. Each of those studies utilized scientific assumptions to project noise levels at sensitive receptors, with mitigation being required in each case where significant noise impacts were identified. The same approach was taken with this project. Impacts were identified for some aspects of this project and related noise mitigation measures identified. Although some assumptions were required for the analysis of impacts for this project due to the fact that various options exist for the selection of certain equipment types, the majority of the modelling was based on information provided by the Project Applicant where specific information pertaining to the noise generation of the proposed equipment was known. Because the project will be conditioned to require extensive noise-compliance testing upon project start-up and thereafter (a recommendation made by the noise study preparers), and because the project will be required to implement additional sound control measures if the applicable noise standards are exceeded upon commencement of those operations, utilizing unrealistic or understated assumptions for project noise-generation would be counter-productive to the objectives of the analysis. Approval of the project does not waive the applicability of the County's noise standards or the applicant's responsibility to satisfy those standards and in order to operate, the project must comply with those standards.

Response to Comment Ind 617-8

Commenter would rather use the Noise Navigator Sound Level Database published by the University of Michigan instead of the Federal Highway Administration's (FHWA) approved national model. It is important to understand that maximum noise levels received at a sensitive receptor seldom result from the simultaneous generation of maximum noise levels from multiple types of

heavy earthmoving equipment. As a result, there is often very little difference in measured average and maximum noise levels associated with the operations of heavy earthmoving equipment. In addition, the average noise generation of heavy equipment is a function of the duration of the hour in which the equipment is operating, the noise generation of the individual equipment types, and the distance between the nearest sensitive receptor and that equipment.

The Roadway Construction Noise Model (RCNM) is the Federal Highway Administration's (FHWA) approved national model for the prediction of construction noise. The RCNM is a national model based on the noise calculations and an extensive construction equipment noise level database. The basis for the national model is a spreadsheet tool with predictions originating from Environmental Protection Agency (EPA) noise level work, which utilizes an "acoustical usage factor" to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during a construction operation. The noise levels listed in the RCNM database represent the A-weighted maximum sound level (Lmax), measured at a distance of 50 feet from the construction equipment. By comparison, the Noise Navigator Sound Level Database does not differentiate between whether the sound levels are presented in terms of maximum, average, or some other acoustical descriptor. Furthermore, many of the sound levels presented in the Noise Navigator database do not include the distance at which the reported levels were measured, making the data unusable for the purposes of evaluating construction noise impacts. Many of the reported levels are at the position of the equipment operator, which has no bearing on the evaluation of construction noise at the nearest residences. The Noise Navigator's spreadsheet reports noise levels ranging from 82 to 102 dBA for front loaders, but no distances are provided for those reported levels. As such, they cannot be compared against the extensive database of equipment noise levels reported at a reference distance of 50 feet in the RCNM database. In addition, there is no information provided at the Noise Navigator website regarding the adequacy of the equipment used to measure the noise levels, the experience of the individuals conducting the noise level measurements, or the conditions present when the noise surveys were conducted. Because the Noise Navigator website states only that, "The tabled values are primarily A-weighted sound levels, as opposed to time-weighted average levels or Leqs. To determine exposures, the user will have to factor in the total exposure time as well as the actual sound level that is present at the ear", and "The values are for representative sources at typical distances. When available, the distance at which the measurement was recorded is listed in the appropriate column". However, no distances are provided for any of the Front End Loader noise level data included at the Noise Navigator Site. Finally, no distances were provided for 5 of the 7 reported sound levels for "Earth Scrapers" at the Noise Navigator site and the distances provided for the other two sites ranged from 3 to 20 meters. Due to the inconsistency and lack of supporting information for the data provided at the Noise Navigator site it cannot reasonably be relied upon for use in predicting construction noise impacts. By comparison, the FHWA RCNM is industry-recognized as a reliable prediction tool for construction noise and has been used in numerous CEQA EIR evaluations prepared by the authors of this project's noise evaluation which have been certified as adequate.

Response to Comment Ind 617-9

The commenter expresses skepticism that violation of the County's Noise Ordinance can result in stopping the project and again suggests using a phone noise calculator. First, Mitigation Measure 4.10-3 of the DEIR is legally binding and enforceable by the County. This mitigation measure requires the mining operation to cease until additional engineering controls can be implemented, as needed. The mine will not be allowed to continue operating until such time that the applicant provides proof demonstrating the operational noise levels comply with the County noise level standards.

Commenter is correct that smart-phone sound level meter (SLM) applications are becoming increasingly popular. And while such applications can provide data which may match data collected by state-of-the-art sound level meters under certain circumstances, care must be taken in interpreting and understanding the results provided by such applications as there are many circumstances when such applications will provide erroneous information. For example, smart-phones do not have a wind-screen, cannot be calibrated, and the microphone has a very small diaphragm, thereby severely limiting the frequency response of the SLM applications, introducing pseudo noise from wind, and inaccuracies in general. Furthermore, because SLM applications do not meet either Type 1 or Type 2 requirements without the use of an external, calibrated, microphone (verified at website: https://www.cdc.gov/niosh/topics/noise/app.html), they do not meet American National Standards Association requirements for accuracy (ANSI S1.4). As a result, such applications should be used with care and an understanding of the limitations of the application.

BAC is familiar with this site and concurs with the commenter that this site provides accurate decibel computations.

Individual Letter 618

From: Nathan W.
To: bdofsupervisors; Heidi Hall
Subject: The mine EIR is woefully incomplete
Date: Friday, March 25, 2022 7:50:40 AM

Dist 1

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I wasn't able to attend the meeting in person but have previously shared via e-mail my concerns with the EIR.

Here is another: it has come to my attention that Hydrology experts have found serious flaws in the analysis included in the Draft Environmental Impact Report for the Idaho-Maryland Mine, raising major concerns about negative impact on wells and the area's groundwater in a time of drought.

Ind 618-1

To be fair, since I live north of Nevda City in district one, I probably don't have to worry about my well! But we are a community, we are all in this together, and when things go wrong, we are all going to be impacted.

And things will go wrong. That's why we have this process. To make sure that is taken account of with mitigation steps in place.

The EIR says the mining company will address well issues…… but ONLY for the 30 wells identified in the report. It does not acknowledge ANY risk for wells beyond that, and there lies the rub. It also does not actually set aside money in escrow for mitigation, leaving them the easy out they have used before by declaring bankruptcy when the issues exceed their optimistic projections.

Ind 618-2

If those wells fail, there are ZERO mitigations proposed of any kind. Fractured rock hydrology is a very imperfect science. There is no way to say with certainty that other homes won't be affected. Those other homes needs to have protections too.

This plan doesn't even propose well monitoring for those other homes, which means that if something fails, there would be NO way for homeowners to prove that the mine was at fault and they would have to bear the costs and timeline themselves.

It currently takes years to install NID water so that means those homeowners would be out of luck for a very long time. And to replace wells across all of Rise Gold's mineral rights area would literally costs millions. Personal costs for each homeowner would be in the 10's of thousands. This is a HUGE risk for both homeowners and the County.

But what is worse, this company tends to pull up stakes when bad things happen. They just file bankruptcy and pack up and leave and don't honor any of their agreements. They did this on one of their last projects in Canada

Ind 618-3

It's not that I don't trust Rise Gold, it's just that they haven't lived up to previous agreements, and left the community holding the bag for the cleanup of a project that they were supposed to do. And even if they pay, the hardship in the process and impact to the community greatly outweighs the benefit to us.

I absolutely, unequivocally DO NOT support re-opening the Idaho-Maryland mine. Nevada County is in tremendous need of brave stewardship that can provide a strong, healthy future for today and for decades to come. Rise Grass Valley's plan to build a mismanaged, short-sighted mine that badly disrupts neighbors and our natural environment while creating irreversible harm for at least 80 years is a crossroads to revitalize our local priorities. Re-opening the mine assumes that their employees want unsafe, short-term careers with a negative impact that is immeasurable, including devastating pollution. The mine will spur a bottleneck of massive truck traffic, intolerable noise, increased dust magnitudes, damage to both our area water sources and private wells combined with depleting electric power resources in a drought region. THIS PROJECT IS UNSAFE and significantly affects the health, security, and peace of Nevada County residents and their families and will disrupt locals' prosperous lives.

Rise Grass Valley has an outdated, unwanted, self-serving project for Nevada County. I URGE THE BOARD OF SUPERVISORS AND OTHER COUNTY OFFICIALS TO PROTECT OUR LOCAL COMMUNITY BY STRONGLY CONDEMNING THE RE-OPENING OF THE IDAHO-MARYLAND MINE.

Thank you for your time.

—Nathan off Rock Creek Road.

INDIVIDUAL LETTER 618: NATHAN W

Response to Comment Ind 618-1

The commenter claims that hydrology experts have found flaws in the analysis in the DEIR. However, the commenter does not describe these supposed flaws, identify the experts, nor reference any alternative studies. The project's technical studies related to hydrology were prepared by experts in the field of hydrology and peer reviewed by a third-party consultant to ensure adequacy. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Ind 618-2

The commenter incorrectly characterizes the mitigation measures provided in the DEIR to address potential impacts to groundwater supplies and domestic wells in the project area. Mitigation Measure 4.8-2(c) on DEIR page 4.8-68 requires the applicant to implement a Well Mitigation Plan for the 7 wells which are expected to be adversely impacted by proposed dewatering according to the groundwater modeling conducted for the project, as well as 23 other properties along E. Bennett Road. In addition, Mitigation Measures 4.8-2(a) and (b) require the applicant to implement a groundwater monitoring program and to provide a comparable alternative water supply should project dewatering significantly impact any additional wells in the area not previously identified. Implementation of these measures would be financed by the Project Applicant.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

With regard to the project's financial assurance mechanism, the comment is noted for the decisionmakers, and the commenter is referred to Master Responses 1 and 2.

Response to Comment Ind 618-3

The commenter's opposition to the project is noted for the decisionmakers – Please see Master Response 1. With regard to the Project Applicant and previous mining projects, the commenter is referred to Master Response 3 - Operator Responsibility. With regard to the project's effect on residents' peace and quality of life, the commenter is referred to Master Response 2 - Social and Economic Impacts.

The commenter broadly lists several environmental concerns but does not provide any specific comments. Each of the environmental topics raised is evaluated in the appropriate chapter of the DEIR.

Individual Letter 619

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 94959-8617

Mr. Kelley:

Ind 619-1

Rise Grass Valley's proposal to reopen the Idaho-Maryland Mine will pump $38 million in direct payroll into our local economy by creating 312 jobs that today do not exist in Nevada County. Who among the Board of Supervisors will be foolish enough to say no to that idea?

Nevada County is in a recession. Our average wage is $45,000 a year, $23,000 lower that the statewide average. They are offering an average annual wage of $94,000 (NOT INCLUDING BENEFITS), and two-thirds of the new hires can come from existing Nevada County residents.

Think about what that means for the small businesses in this county. The benefits to the local building and contracting industry are obvious, but what does it mean to an independent restaurateur in Grass Valley or a small shop owner in Nevada City? To have 15-20 more customers a week because there are more people with strong incomes working locally. What does it mean to the school districts to have an influx of tax base and new students rather than worrying about school closures and budgets being cut?

My company has worked with Rise Grass Valley, and we're confident in their plan. I urge the Board of Supervisors to support jobs and economic growth in the county by supporting the Idaho Maryland Mine and recapturing our strong history of responsible mining locally.

Neal Siller
Siller & Siller
PO Box 430,
Penn Valley, CA 95946

INDIVIDUAL LETTER 619: NEAL SILLER

Response to Comment Ind 619-1

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 620

From: Nelson Foster <graypine2@hughes.net>
Sent: Monday, April 4, 2022 6:04 AM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine

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Friends,

I want to join fellow Nevada County property owners registering concern about the EIR presented by Rise Gold pursuant to its application to reopen the Idaho-Maryland Mine.

Ind 620-1

Professional reports that support mines — Siskon Gold, in my neighborhood — are custom-made to understate risks and overstate benefits and protections. A lot of people better qualified than I have given the County many reasons to read the Rise Gold argument skeptically. I'm particularly concerned about dewatering and greenhouse gas emissions.

Please rule against reopening the Idaho-Maryland Mine.

Thank you,
Nelson Foster
17973 Tyler-Foote Rd., Nevada City, CA 95959

1

INDIVIDUAL LETTER 620: NELSON FOSTER

Response to Comment Ind 620-1

The comment expresses a general opinion that the DEIR understates the risks and overstates the benefits and protections of the proposed project, but does not provide specific examples that would allow for a detailed response.

Pursuant to the requirements set forth by CEQA Guidelines Section 15121, the DEIR assesses all potential project impacts that could occur to all environmental issue areas required for analysis under CEQA. As part of such assessment, the DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent peer reviews of the applicant-provided reports. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Regarding the commenter's general dewatering and greenhouse gas emissions concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 27 – Greenhouse Gas Thresholds.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 621

From: Nicki Hansen-Dix
To: BOS Public Comment
Subject: To be read at BOS meeting: Deny Rise Gold mining operation
Date: Tuesday, January 18, 2022 4:52:50 PM

Unable to identify

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Ind 621-1 My name is Nicki Hansen-Dix. I am a retired architect and project manager for both county and Federal governments. I reviewed and made decisions based on EIR findings and managed small and large design and construction projects from concept to completion. I live just off Bennett in Grass Valley and so have a personal stake in the impacts of this proposed project.

Ind 621-2 I urge you to deny the opening of this mine. The negative effects regarding water supply and contamination alone should be enough to convince you of the harm to the environment and the community. But reduction in already poor air quality, the addition of noise pollution and disruption to the rural life of residents of our county need also be considered.

Ind 621-3 In addition, with the history of unmitigated pollution and damage caused by the entity proposing this project, this company would never have been approved for any of the government projects I managed. Their past performance raises huge red flags for the health and safety of our county.
Mining has historically damaged and poisoned much of our county. Please do not allow this to happen again. Do not let this project go forward.
Thank you for your consideration.

INDIVIDUAL LETTER 621: NICKI HANSEN-DIX

Response to Comment Ind 621-1

The comment does not address the adequacy of the DEIR, but rather summarizes the commenter's qualifications.

Response to Comment Ind 621-2

The comment does not directly address the adequacy of the DEIR. Regarding water supply concerns, the commenter is referred to Chapter 4.8, Hydrology and Water Quality, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding contamination concerns, please see Chapter 4.7, Hazards and Hazardous Materials, as well as Master Response 8 – Mine Waste Characterization. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration. Regarding general air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, as well as Master Responses 18 – Air Quality Thresholds. Concerns related to quality of life are outside the scope of CEQA - please see Master Responses 1 and 2.

Response to Comment Ind 621-3

The comment does not address the adequacy of the DEIR. Regarding operator concerns, please see Master Response 3 – Operator Responsibility. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 622

Matt Kelley, Senior Planner
Nevada County Planning Department
Idaho.MMEIR@co.nevada.ca.us

Comments on Draft Environmental Impact Report for proposed reopening of Idaho-Maryland Gold Mine

My name is Nicki Hansen-Dix. I am a retired architect having worked as an architect and project manager for federal and county governments (General Services Administration Design and Construction Division in San Francisco and Los Angeles, Sonoma County Architects Office and Placer County Architects Office). I have lived in Nevada County for twenty years. My parents lived here beginning in 1979. My great-great-grandparents were married near Chalk Bluff in this county and my great-grandfather was born here. I now live at 115 Union Jack Street, #38, Grass Valley, in the zone that is within 1 - 1,000 feet from the Idaho-Maryland mine mineral rights, less than two miles from the mine property and less than one-half mile from the Centennial site.

I attended a portion of the meeting on March 24th and heard many of the issues I have with the DEIR report addressed there. In light of that, I will not detail all of my own concerns here knowing others have already gone on record to communicate those to you. But I agree with the consensus that this DEIR is inadequate:

Ind 622-1

- in the scope of the impacts (e.g., where does it fully address the changes to quality of life or impact on community mental health that will be caused by this project),
- in the suggested mitigations that miss entire elements of an impact (e.g., the proposed NID extension impact on property owners described below), or
- by downplaying impacts (e.g.,
    - admitting temporary noise levels 4.10-1 will be Significant and Unavoidable (SU) for construction of potable water line, but permanent increases of excess noise levels of the project 4.10-3 will be Significant (S) mitigated to Less Than Significant (LS) despite 24/7 construction and mine operations involving explosions, rock crushing and other mechanical and equipment noise, and inescapable truck traffic, or
    - determining impacts to be LS and therefore no mitigation needed when impacts are actually significant (e.g., creating a new source of substantial light or glare associated with the proposed project 4.1-3, which is definitely a larger than LS impact in a rural area with a new 24/7 operation).

I will address aspects of the NID pipeline, noise, air quality, housing, emergency egress in evacuations, climate change and carbon offsets.

The proposal to extend NID pipeline to potentially impacted well owners, 4.8-2(c)

I am only pointing out two of the issues relating to the proposed NID line extension to well owners. And as the NID representative who spoke at the March 24th meeting said, the number of potential wells impacted will far exceed those listed in the DEIR.

Ind 622-2

- Not addressed is the loss of the ability to live "off the grid" by having an independent source of water. One reason for living rurally is the commitment to sustainable living. Providing NID access does not solve this issue. Land owners with wells have already worked and paid for their water supply and should not be forced to depend on public infrastructure.
- Many people do not consider "treated" water to be the healthiest option for themselves or that of their animals/stock or landscape/crops/gardens. This is illustrated by the large number of

households using filtering systems for tap water, from single filtering pitchers to whole house filtration systems, in order to eliminate chemicals such as the chlorine routinely added to the public water supply.

***Can a property owner who declines NID connection opt to have their well deepened at Rise's cost?**

Ind 622-3

An observation regarding **Figure 4.8-13 Potential Expansion of Future Mine**: I find it interesting that potential mining expansion extends significantly beyond the mineral rights boundary in several areas.

Ind 622-4

Noise and Vibration 4.10 as it will impact residences, businesses, wildlife, livestock, pets, families, and vegetation within and near the proposed mine site, along the truck route to the Centennial site—including the Whispering Pines Businesses Park and nearby businesses such as Peaceful Valley Farm & Garden Supply[1]—and also the truck routes to and traveling along SR 20/49 extending throughout county and state.

Despite the fact that Nevada County Zoning Ordinance exempts construction activities from the noise standards, and despite DEIR's tables listing decibel levels being within allowable ranges, and despite five plus six years being considered "temporary", the unrelenting seven-day-a-week noise onslaught will cause damage to the health of humans, pets, livestock and wildlife. This impact to health cannot be mitigated. Allowing this project to proceed will cause harm to several generations over the 80-year period of this project. See Note 1 at the end of these comments for some of the specific detrimental health effects caused by noise.

4.10-1 Generation of a substantial temporary increase in ambient noise levels ... even with the implementation of mitigation, the impact would be considered significant and unavoidable. ...

4.10-2 Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to fill placement, compaction, off-site traffic, and related activities. Based on the analysis below, with the implementation of mitigation, the impact is less-than-significant.

Ind 622-5

Placement and compaction of engineered fill at the Centennial Industrial Site would occur over approximately five years, and placement and compaction of engineered fill at the Brunswick Industrial Site would occur over approximately six years. Movement of fill from the Brunswick Industrial Site to the Centennial Industrial Site would involve an increase of heavy truck traffic along off-site roadways, which could increase local noise levels. The aforementioned activities would lead to a temporary increase in ambient noise levels in the project vicinity

"Less Than Significant"? Just look at the truck traffic trip frequency, Haul/Transport Truck Operations, per Chapter 3 - Project Description:

1. engineered fill:	50-100 round trips/day. For the first five plus six years (eleven total), limited to the project site and to and from the Centennial site. Subsequently transported to "local markets", which would impact a much larger area of roads and their adjacent

[1] Question: How will 100 passing trucks/day with their diesel exhaust and dust from mining products affect Peaceful Valley's organic products and plant life? Will it affect their "organic" designation?

	residences/businesses/recreational or wildlife areas, extending far beyond the immediate area of the mine project.**
	****Has this extended area impact been addressed in the DEIR?**
2. gold concentrate:	1-5 trips/day, over the 80-year term of the use permit, 145-mile one-way trips to the Port of Oakland**
3. diesel fuel tankers:	1 every 2 weeks, to and from the project site, using Brunswick Road to SR 20/49, over the 80-year term of the use permit, through residential, business, natural environments and fire danger zones 2 tankers/day in times of inevitable PSPS shut-offs for additional fuel demands of back-up generators
4. cement trucks:	9 trucks/week, max. 2/day
5. freight trucks:	3/week, max. 3/day, Brunswick Rd. to and proceeding along SR 20/49 over the 80-year term of the use permit
6. explosives via semi-trucks:	1/week, max., min. 1 every 3 weeks (during initial underground construction, explosives may be transported to the site more frequently) These trips will be through rural—including fire danger zones—and heavily populated traffic areas over the 80-year term of the use permit.
7. personal employee vehicles:	217 vehicle parking spaces are provided. Some of these trips would be local, but a minimum of 99 workers would be from outside the local area.**
	Haul trucks, freight trucks, explosive trucks, and cement delivery trucks are anticipated to have a 60-mile one-way trip length (4.3-71)**

So, somewhere between 370 and 785 truck trips per week, plus however many personal vehicles fill up to 217 parking spaces daily—should we multiply 217 times the number of shifts per day times seven days per week? Even using 2 shifts per day when there are certain jobs which have three shifts per day, that is 217x2x7=3,038 round trips of personal vehicles per week? That's hard to believe; I really hope my math is wrong on that!

These truck and personal vehicle trips not only contribute to **4.10 Noise and Vibration**, but also **4.3 Air Quality, Greenhouse Gas Emissions, and Energy**, **4.7 Hazards and Hazardous Materials**, **4.12 Transportation** (Traffic), **4.13 Wildfire**, and overall quality of life.

Ind 622-6

In terms of wildfire danger—notwithstanding the potential for accidents involving explosives transport and diesel transport—the project would add a considerable number of trucks, other project vehicles, and employees' personal autos to the community. Despite the statement in 4.7-4 that this impact would be Less than Significant in the event of an emergency evacuation, this added number of vehicles would exacerbate any emergency evacuations in an area where there are limited evacuation routes. We had two such evacuation orders in this vicinity last year and I can tell you, having been part of those evacuations, that directing the hauling vehicles to "pull off the road to enable residents to evacuate" is not a solution. No doubt, in an active fire situation, those drivers are going to want to leave the vicinity, as will the workers at the mine who fill the 217 parking spaces on the project site.

Page 3 of 6

Ind 622-7

As to **4.3 Air Quality**, I will mostly defer to the comments made by Dr. Jeff Kane at the Public Hearing as he addressed the already "F-grade" quality of air in our county and spoke about the list of toxic airborne substances that will degrade that further (8.5 million tons known to be toxic over 80 years) saying "We can't take this!" He also pointed out that requisite mitigation measures are too numerous to enforce.

Ind 622-8

Chapter 4.5 – Cultural and Tribal Cultural Resources Page 4.5-28 ... *the project applicant possesses a private library of information that describes the underground mine workings of the Idaho-Maryland Mine in its entirety.*
4.5-1(a) Following initial mine dewatering, and prior to commencement of underground mining, the project applicant shall share the historical documentation of the Idaho-Maryland Mine Company in their possession with the public through one of the following libraries: the California State Library, the California Geology and Mining Library, or the Searls Library. The library shall consist of the following information: nine descriptions follow of maps (388) and documents, photos and drawings dated from 1919 through 1956.
I am just curious, if "*A significant public and historic preservation benefit may be gained from sharing the library with the public,*" why wait until the mine is dewatered? Why not donate those significant documents now?

Ind 622-9

4.9 Land Use and Population and Housing
Page 4.9-26, *It is anticipated that approximately 99 workers (32 percent of workforce) would be recruited from outside the local area; these positions require extensive experience in underground mining which are less likely to be possessed by persons currently residing in the immediate local area.*
The addition of 240 persons as a result of the proposed project would not impact the existing housing stock for Nevada County, given the existing vacancy rates.

Despite tables showing vacant housing, it is well known that housing in our county is not easy to come by. My own personal experience and that of friends in the last few years illustrates how difficult it is to find quality affordable housing. With an anticipated <u>minimum</u> of 99* workers recruited from outside the local area, that is a strain on our housing infrastructure, not a less-than-significant impact on people in this county already having trouble finding adequate housing.

*Rise may say they anticipate hiring 68% of the workforce locally but can they be held to that number?

Ind 622-10

Climate Change
Did the DEIR consider the affects of climate change—change in weather patterns, temperature increases, extended drought, etc.—in its calculations and mitigations for each of the impact categories? If climate change effects are not addressed in the DEIR, then its conclusions cannot be relied on over the extensive timeline of this proposed project. The subject of climate change was discussed in detail in 4.3, but I did not see it specifically addressed in the project impacts and mitigations portions of the DEIR chapters.
As just one instance, the effects on changes to the water table caused by climate change and/or prolonged drought combined with the impacts of the mine project, how could that cumulatively affect health of the landscape and habitat above the dewatered mining areas over 80 years? Potential loss of trees? Tree loss due to drought and the pine bark beetle is already here. Potential increase in fuel for wildfires if landscape dries/dies out? This is just one element that could be impacted. Almost every other chapter in this DEIR could be impacted by climate change as it progresses.

Ind 622-11

4.3 Air Quality, Greenhouse Gas Emissions, Energy
The DEIR may detail the mitigations of numerous fuel saving measures or procedures that lessen pollutants, but that does not address the massive amounts of diesel fuel (and gasoline) that will be sourced and burned 24/7 over 80 years—just refer to the above-mentioned vehicle trip frequencies—nor the sum total of pollutants over the 80 years. No matter what mitigation techniques are in effect, the cumulative detrimental effects to air quality and the creation of greenhouse gas emissions in an era of climate catastrophe is not adequately addressed in this report. In this time when we need to address and reverse the danger to our planet, the microcosm that is this proposed project does just the opposite.

Because state regulations regarding air quality and greenhouse gas emissions may well become more stringent as the climate crisis evolves, will this proposed project be liable to follow new regulations as they arise or will it be required to follow only those in force at the time the permit is approved?

Ind 622-12

4.3-7(b) Carbon Offsets – Construction Emissions.
Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions
What specific offsets are proposed? Instead of a financial transaction of retiring carbon offsets, can these be actual project site physical rectifications such as creating a clean renewable energy source like solar to meet the project's energy demand, or planting trees along the trucking route as well as replacing those trees lost as a result of the project, or requiring employees to carpool or bike to work with a majority of parking spaces allocated to electric vehicles rather than just a few spaces—something to benefit the community where the construction related emissions actually take place?

Ind 622-13

There are so many areas I have issues with and questions about. I have only addressed a portion in this letter. I do not see many positive effects that will result from this project going forward; overwhelmingly negative impacts to our environment and community.
Those copious impacts that the report declares will be mitigated, are dependent on massive amounts of regulations and oversight. Who will be watching to ensure all these regulations are followed and met? The Planning Department? Independent investigators? Regulatory representatives? Rise Gold itself? Who pays for that? As Jeff Kane said at the March meeting, the requisite mitigation measures are too numerous to enforce. Even a small number of these mitigations, if not followed, could be devastating to our county.

Thank you for your work on this. You have a tremendous job ahead of you.

Nicki Hansen-Dix
115 Union Jack St, #38, Grass Valley, CA 95945
530-320-9647

Note 1
As stated in an Atlantic article November 2019, Why Everything Is Getting Louder, By Bianca Bosker

> Scientists have known for decades that noise—even at the seemingly innocuous volume of car traffic—is bad for us. "Calling noise a nuisance is like calling smog an inconvenience," former U.S. Surgeon General William Stewart said in 1978. In the years since, numerous studies have only

> underscored his assertion that noise "must be considered a hazard to the health of people everywhere." Say you're trying to fall asleep. You may think you've tuned out the grumble of trucks downshifting outside, but your body has not: Your adrenal glands are pumping stress hormones, your blood pressure and heart rate are rising, your digestion is slowing down. Your brain continues to process sounds while you snooze, and your blood pressure spikes in response to clatter as low as 33 decibels...
> Experts say your body does not adapt to noise. Large-scale studies show that if the din keeps up—over days, months, years—noise exposure increases your risk of high blood pressure, coronary heart disease, and heart attacks, as well as strokes, diabetes, dementia, and depression. Children suffer not only physically—18 months after a new airport opened in Munich, the blood pressure and stress-hormone levels of neighboring children soared—but also behaviorally and cognitively. A landmark study published in 1975 found that the reading scores of sixth graders whose classroom faced a clattering subway track lagged nearly a year behind those of students in quieter classrooms—a difference that disappeared once soundproofing materials were installed.

Alex Brown's article on how noise pollution hurts wildlife for Pew Trusts, October 22, 2019 states, "Increasingly, research shows that human-caused noise can be harmful to many species."

> The literature has shown that noise fundamentally changes behavior, distributions and reproductive success [for wildlife]," said Jesse Barber, who runs the Sensory Ecology Lab at Boise State University.
> Several years ago, Boise State's Barber and a team of scientists installed 15 speakers in an Idaho woodland and played traffic noises to create a "phantom road" over half a mile of terrain. They found that 30% of songbirds moved elsewhere once the noise began, and many other species that remained struggled to gain weight.

[Human generated noise]...has been linked to decreases in species diversity, bird populations, and tree growth.

Page 6 of 6

INDIVIDUAL LETTER 622: NICKI HANSEN-DIX

Response to Comment Ind 622-1

Regarding quality of life concerns, please see Master Response 1 - Non-EIR/Administrative Issues.

The commenter states that the DEIR is missing elements of an impact such as proposed NID pipeline impact on property owners. However, the commenter provides no information as to which elements are missing from the DEIR. The impacts of the proposed NID pipeline are analyzed throughout the DEIR (see Chapters 3 and 4 of the DEIR).

The commenter states that noise impacts are "downplayed" in the DEIR, but provides no specific information as to why these impacts are downplayed. The commenter is referred to Chapter 4.10 of the DEIR. As stated on page 4.10-45 of the DEIR:

> Based on the above [analysis], none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 is included out of an abundance of caution to ensure satisfaction with such standards and to reduce the potential for annoyance resulting from the proposed project to the maximum extent feasible. It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be ***significant***.

Mitigation Measure 4.10-2 requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

The commenter states that impacts that the DEIR determined to be less than significant are actually significant and provides light and glare as an example due to its location in a rural area and the 24/7 operations proposed by the project. As discussed on pages 4.1-23 through 4.1-29 of the DEIR, the proposed project would not create a new source of substantial light or glare which

would adversely affect day or nighttime views in the area. The determination of less than significant is based on substantial evidence provided in the form of a photometric plan for the Brunswick Industrial Site, inclusive of lighting types and projected lumen intensities across the site. As stated on page 4.1-24 of the DEIR, based on the photometric plan:

> […] the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles[5], and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

Response to Comment Ind 622-2

Please see response to Nevada Irrigation District comments – Agency Letter 10 of the Final EIR.

Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues.

Drinking water supplied to Nevada Irrigation District (NID) customers continues to meet and exceed state and federal public health standards, based on testing results that serve as the basis for the District's Water Quality Report. See https://www.nidwater.com/files/1e68c2c9b/NID+WQR+2021.pdf

The Well Mitigation Plan has been modified to clarify the range of actions that would be taken if necessary for well mitigation outside of the E. Bennett Road area, if unanticipated well impacts occur. Connection to NID potable water would be one of many options available for well mitigation. Please see modified Well Mitigation Plan attached to the Final EIR as Appendix D. Any cost of well mitigation, including deepening of wells, would be the responsibility of the applicant.

Response to Comment Ind 622-3

No mining would be done outside of the mineral rights boundary. Figure 4.8-13 shows sensitivity scenario 6 from the groundwater model, where planned mining is extended for an additional 40 years past the 25-year base-case. As discussed on pages 27 and 28 of Appendix K.3, the expansions in Scenario 6 would represent a major discovery of parallel veins, similar to those mined historically in the Brunswick Mine, within the known mineralized system. These expansions are modeled to depth below the Idaho and Brunswick Mines and below the "Mitchell Crosscut," which extends past the main mine workings to the north on the 1,000-ft level. As can been seen in the figure the existing Brunswick mine workings were copied in order to generate the conceptual mine workings for the sensitivity scenario, which results in some mine workings outside of the mineral boundaries that would not occur in reality and therefore provides conservatism to the analysis of groundwater impacts. Nonetheless, to address public concerns regarding the scope of future mining within the mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202), and will also prohibit blasting closer than 500 feet below ground surface except for construction of the service shaft. Please see Appendix A to the Final EIR for the aforementioned maps.

[5] One foot-candle is a unit of illumination equal to that given by a source of one candle at a distance of one foot.

Response to Comment Ind 622-4

The commenter states that noise and vibration from the project would affect people, animals and vegetation at the project sites and local and state roads and highways and these impacts are unmitigable. The commenter references "Note 1", which is excerpted from several newspaper articles. Noise and vibration impact thresholds used in the impact analysis, in accordance with CEQA guidelines, is provided in Chapter 4.10 of the DEIR. Note that heavy trucks and lighter vehicles already exist on local roadways as a source of traffic noise, and the project would only add an incremental increase to existing noise levels. Wildlife disturbance is discussed on page 4.4-74 of the DEIR.

The commenter asks if diesel exhaust and dust will affect Peaceful Valley's organic products for "organic" designation. Numerous trucks already travel on Whispering Pines Lane, and the project would add an incremental increase to existing traffic volumes. Please see Table 32 of Appendix O of the DEIR. Please also see Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 622-5

Employee schedules are shown in Table 3-8 of the DEIR. Noise impacts from project traffic has been analyzed in the DEIR. Please see Chapter 4.10 and Appendix L of the DEIR. Specifically, please refer to Impact 4.10-2 of the DEIR, which evaluates traffic noise level increases attributable to all project traffic. The traffic noise analysis determined that the project's incremental traffic would not exceed the applicable traffic noise increase thresholds along surrounding roadways.

However, the analysis determined that noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Therefore, the project could result in the generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, and a significant impact could occur. Mitigation Measure 4.10-2 would reduce the potential jake brake noise impact to a less than significant level.

Response to Comment Ind 622-6

Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues.

Please see Master Response 5 - Evacuation Zones.

Regarding truck and personal vehicle trip noise and emissions, these are evaluated Chapter 4.10 (see Impact 4.10-2) and Chapter 4.3 (see Impacts 4.3-1 and 4.3-2), respectively.

Response to Comment Ind 622-7

Please see Master Response 18 - Air Quality Thresholds.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. The County has adequate staff and expertise for enforcing permit conditions, and routinely enforces similar conditions and mitigation measures on other projects in the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 622-8

The mitigation measures of the DEIR are designed to mitigate impacts from the proposed project. The proposed project has not been approved or implemented at this time; thus, the mitigation is not yet required and the County has no present legal authority to request the referenced private documents.

Response to Comment Ind 622-9

As discussed on page 4.9-25 of the DEIR, Nevada County has 53,745 total housing units with a 22.5 percent vacancy rate (12,098 vacant housing units). The unincorporated area of Nevada County has a total of 32,182 housing units with 4,645 vacant housing units (14.4 percent vacancy rate). Therefore, it is reasonably anticipated that the addition of 312 persons to the County as a result of increased employment generated by the proposed project could be accommodated by existing housing stock in Nevada County.

The County cannot enforce local hiring. However, as stated on page 4.9-26 of the DEIR, substantial economic incentives exist to maximize employee recruitment from the local Nevada County area.

Response to Comment Ind 622-10

Please see Master Response 16 - Drought and Climate Change.

Response to Comment Ind 622-11

The air emissions and greenhouse gas emissions for project activities and cumulative impacts have been analyzed for the project. Please see Chapter 4.3 of the DEIR.

The project would be subject and required to comply with any new state regulations regarding air quality and greenhouse gas emissions imposed throughout the life of the project that are applicable to vehicle standards or other operational aspects to which those standards apply.

Response to Comment Ind 622-12

The commenter suggests that onsite improvements or local tree-planting be used to offset the Greenhouse Gas emissions of the project. However, climate change is a global impact, so purchase of carbon credits from off-site sources would have the same global mitigation impact as compared to onsite or local mitigation. The commenter's suggested mitigation would not avoid or lessen a significant project impact, so it is not required to be implemented under CEQA.

As discussed on page 4.12-82 of the DEIR, because the Proposed project is anticipated to employ approximately 312 direct employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the Project Applicant would be required to submit a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence. Although the overall project site is not currently served by transit and the Nevada County Transit Services Division does not have plans to bring service to the project area, the nearest bus route to either the Brunswick Industrial Site or Centennial Industrial Site is Route #3, which operates between the Tinloy Street/Bank Street Transit Center and the Nevada County Airport and passes directly by the Centennial Industrial Site. The proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces). Pursuant to Nevada County LUDC, additional potential transportation reduction alternatives for the proposed project were identified in the Traffic Impact Analysis prepared for the proposed project, based on the Transportation Demand Management strategies included in the Vehicle Miles Traveled Implementation report prepared by Fehr & Peers for the NCTC.

Response to Comment Ind 622-13

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. The County has adequate staff and expertise for enforcing permit conditions, and

routinely enforces similar conditions and mitigation measures on other projects in the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Individual Letter 623

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Nicki Hansen-Dix

Address: 115 Union Jack St #38 GV 95945

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 623-1

There are so many "Impacts" with No mitigation specifics identified but still state the Impact listed as Significant (S) as being reduced to Less than Significant (LS) post mitigation.

Ie, mitigation measure says must provide plan, proposed plan, proposed tests, shall submit, plan will be required, etc.

There is no way to verify in this DEIR that S will go to LS post mitigation based on no mitigation methods currently submitted.

All Impacts that rely on future plans should not be termed LS without a mitigation described.

INDIVIDUAL LETTER 623: NICKI HANSEN-DIX

Response to Comment Ind 623-1

The comment expresses a general opinion that the DEIR contains potentially significant impacts that are mitigated to less-than-significant levels without providing mitigation measures to reduce the severity of such impacts; however, the commenter does not provide specific examples that would allow for a detailed response.

The DEIR includes mitigation measures to reduce potentially significant impacts to the extent feasible, with most mitigation measures reducing identified potential impacts to less-than-significant levels. Where the mitigation measures set forth therein do not reduce identified impacts to a less-than-significant level, the DEIR discloses that such impacts would remain significant and unavoidable.

In instances where mitigation measures require future preparation of plans to prevent potential impacts, such measures include specific standards with which the future plans must comply. For example, Mitigation Measure 4.6-3(a) requires that the Project Applicant have a final geotechnical engineering report prepared by a State-registered civil engineer that shall be incorporated into the project improvement plan submittals. Mitigation Measure 4.6-3(a) further requires that the recommendations from the final geotechnical engineering report be incorporated into the project improvement plans. Finally, the mitigation additionally requires that grading plan review and construction monitoring shall occur in accordance with the recommendations from the Geotechnical Engineering Reports (Geotechnical Engineering Report, Idaho-Maryland Mine Project – Brunswick Industrial Site. November 18, 2019; and Geotechnical Engineering Report, Idaho-Maryland Mine Project – Centennial Industrial Site. December 20, 2019). Through compliance with the above, potential impacts related to unstable geological units or soil would be reduced to less than significant.

Individual Letter 624

Fwd: mine

about:blank?compose

Dist 5

RECEIVED

MAR 14 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Ave., Suite 200
Nevada City, CA 95959

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller,Susan Hoek, and Hardy Bullock,

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

Ind 624-1

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting, and diesel and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossmen of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

Ind 624-2

My business is located in the town of Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Ind 624-3

Thank you for you dedication to Nevada County,

Nina Allen Cunningham
11566 Valencia Rd.
Nevada City, CA 95959
530-478-1248

ninaallenc@sbcglobal.net

1 of 1

3/9/2022, 10:22 PM

INDIVIDUAL LETTER 624: NINA CUNNINGHAM

Response to Comment Ind 624-1

Please see Master Responses 13 through 16 regarding the commenter's water and drought concerns.

Response to Comment Ind 624-2

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Regarding general noise concerns, please see Chapter 4.10, Noise and Vibration.

The commenter also appears to raise legacy contaminant concerns from past mining. Please refer to Response to Comment Grp 25-30.

Please also see Master Response 3 – Operator Responsibility.

Response to Comment Ind 624-3

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project. Please see Master Responses 1 and 2.

Individual Letter 625

Dist 5

Nevada County Board of Supervisors
950 Maidu Ave., Suite 200
Nevada City, CA 95959

March 9th, 2022

Dear Supervisor Heidi Hall, Ed Scofield, Dan Miller,Susan Hoek, and Hardy Bullock,

I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

Ind 625-1

From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting, and diesel and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossmen of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

Ind 625-2

My business is located in the town of Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Ind 625-3

Thank you for you dedication to Nevada County,

Nina Allen Cunningham
11566 Valencia Rd.
Nevada City, CA 95959
530-478-1248
ninaallenc@sbcglobal.net

INDIVIDUAL LETTER 625: NINA CUNNINGHAM

Response to Comment Ind 625-1
Please see Response to Comment Ind 624-1.

Response to Comment Ind 625-2
Please see Response to Comment Ind 624-2.

Response to Comment Ind 625-3
Please see Response to Comment Ind 624-3.

Individual Letter 626

(no subject) about:blank?compose

Nevada County Planning Commission
950 Maidu Ave., Suite 170
Nevada City, CA 95959

March 9th, 2022

To The Planning Commission:

Ind 626-1 I see no benefit coming to the County from the opening of the Idaho-Maryland Mine by Rise Gold.

Ind 626-2 From the DEIR I see that water availability for the mine project is based on past years, not on current extreme drought years. Rise Gold has grossly underestimated the impact water use and water removal will have on the water table and adjacent homes, while offering a paltry mitigation time period within the 80 years of their lease. The noise and vibration from trucks and blasting will disturb my patient. The diesel Fumes and heavy metal mine dust pollution are all dangerous to our health and businesses. Dumping massive amounts of water into Wolf Creek will stir up past mining toxins in the stream channel and destroy habitat. We already live in a cancer hot spot. We have already experienced the toxic effect of the past mining era. New safety technologies can not mitigate all this. And why does anyone trust Ben Mossmen of Rise Gold? His Banks Island Gold, polluted tribal waters, went bankrupt and left a mess for Canadians to clean up. He and others involved have 18 pollution charges that are going to trail in April.

Ind 626-3 My business is located at 518 South Auburn St., Grass Valley. I already am negatively impacted from the noise, vibration and bad air along the 49/South Empire corridors. I DO NOT WANT an industrial gold mine at my front door and I don't know a single person, no matter their political persuasion, who thinks this mine is a good idea. For God's sake please find another source of tax dollars that will actually benefit the community instead of polluting our County and making us sick.

Thank you for you dedication to Nevada County,

Nina A Cunningham
11566 Valencia Rd
Nevada City, CA 95959
530-478-1248
ninaallenc@sbcglobal.net

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PLANNING DEPARTMENT

1 of 1 3/11/2022, 11:16 PM

INDIVIDUAL LETTER 626: NINA CUNNINGHAM

Response to Comment Ind 626-1
Please see Response to Comment Ind 624-1.

Response to Comment Ind 626-2
Please see Response to Comment Ind 624-2.

Response to Comment Ind 626-3
Please see Response to Comment Ind 624-3.

Individual Letter 627

From: Nora Nausbaum <noraroberta@gmail.com>
Sent: Saturday, April 2, 2022 10:29 AM
To: Idaho MMEIR
Subject: NO Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 627-1

No Mine -- Increased fire danger due to large trucks on the road, increased mine water needs. Probable increased air, water, soil pollution. Guarantees from Rise Gold are not trustworthy since their track record is very poor.

Nora Nausbaum
Bill Douglass
15631 Lower Colfax Road
Grass Valley, CA
(530) 273-5489 h
(530) 798-9585 c

1

INDIVIDUAL LETTER 627: NORA NAUSBAUM

Response to Comment Ind 627-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding fire concerns, please see Master Responses 5 and 6. Regarding water concerns, please see Master Responses 14 and 15. Regarding general air, water, and soil pollution concerns, please see Chapters 4.3, 4.8, and 4.7, respectively.

Individual Letter 628

From: Nora Risen
To: BOS Public Comment
Subject: NO GOLDMINE MINE...PLEASE READ!
Date: Thursday, February 3, 2022 7:49:06 PM

Cannot confirm residency

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear BOS,

Ind 628-1 I am against the reopening of the old Idaho Maryland Mine site reopening by Rise Gold. They purchased the property with its current zoning which prohibits a gold mine operation. Please do not approve a conditional use permit for Rise Gold and change zoning. Residents purchased properties around the site with the assurance that a heavy industrial operation would not be allowed. Many residents like me looked at the Nevada County General plan before we purchased in this county. You can't just rip it up, change it and make it up as you go!

Ind 628-2 If you allow the goldmine and your best efforts to mitigate fail, we have so much to loose:

- Unacceptable noise levels and destruction of quiet enjoyment of surrounding taxpayer properties
- **Ind 628-3** Trucking of toxic waste causing pollution, traffic and destruction to our residential roadways
- **Ind 628-4** Huge Increase in energy consumption, pollution and noise due to the massive diesel generators and additional electrical needed
- **Ind 628-5** Drinking water/well water integrity and possibility of dry wells to neighboring community (Look at our history please. Look at San Juan Ridge and Lost Lake where a US Federal Superfund to clean up is STILL in place DECADES LATER!)
- **Ind 628-6** Unacceptable water toxin levels dumped into the Wolf Creek. There are sensitive wetland area in certain areas where you have already allowed at least one large scale commercial cannabis grow on an active wetland with nesting and breeding species. Unbelievable!
- **Ind 628-7** Uncertain underground tunnel integrity leading to a whole new slew of ground issues
- **Ind 628-8** 80 years, 24/7 operation
- **Ind 628-9** Loss of property values
- **Ind 628-10** Rise Gold history of litigation of toxic dumping in their homeland of Canada and history of insolvency / bankruptcy
- **Ind 628-11** 70 or so underground mining jobs created for all of our sacrifice? High level jobs have been spoken for according to Rise Gold.
- **Ind 628-12** Is Nevada County receiving anything of monetary value for approving the goldmine? As constituents, we must be made aware of all promised to you or the county.

Ind 628-13 Please ask yourselves in honesty, does Nevada County really have the people power to oversee this HUGE Goldmine operation which YOU WILL BE RESPONSIBLE FOR, with all the commercial cannabis already approved among other day to day operations? Already we are seeing violations of cannabis operations you have made agreements with and they have failed to comply. I have written to you about these.

NO MINE! It would be a catastrophe of epic proportions in so many ways. Please do your part

and vote NO on the mine.

Our HEALTH before their WEALTH.
WE ARE MORE VALUABLE THAN GOLD!

Nora Risen

INDIVIDUAL LETTER 628: NORA RISEN

Response to Comment Ind 628-1
The commenter opposes the project and urges the County not to approve a Conditional Use Permit. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 628-2
The commenter states that the project will result in unacceptable noise levels but provides no additional information and does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.10 (Noise and Vibration). The only unacceptable noise levels would occur during the temporary construction of the potable water pipeline along East Bennett Road. "Unacceptable" in this context is defined as exceeding the applicable County noise thresholds after implementation of feasible mitigation.

Response to Comment Ind 628-3
The commenter is concerned about the transport of engineered fill, traffic impacts, and damage to local roadways. The commenter does not provide any additional information and does not state how the DEIR is inadequate. Air emissions from trucks are analyzed in Chapter 4.3 of the DEIR, traffic and roadway impacts are analyzed in Chapter 4.12 of the DEIR.

Response to Comment Ind 628-4
The commenter states that the project's use of diesel generators will have negative impacts to noise, air quality, and energy consumption but does not state how the DEIR is inadequate in analyzing and mitigating these impacts. Noise impacts from backup diesel generators is less than significant after mitigation. (DEIR p. 4.10-43.) Air emissions from the use of backup diesel generators are provided on page 4.3-104 of the DEIR. As noted in the DEIR, because the use of emergency generators is speculative and beyond the reasonable control of the Project Applicant, the emissions presented in Table 4.3-25 are for informational purposes only. Finally, it is important to note that while the use of emergency generators during power-outages such as PSPSs is outside of the scope of CEQA, the regular use of generators for routine maintenance and testing has been considered throughout the entirety of the analysis of the chapter, as such use is not speculative.

Response to Comment Ind 628-5
The commenter is concerned about the water quality and water quantity impacts to groundwater wells but does not state how the DEIR is inadequate. The commenter is referred to Chapter 4.8 (Hydrology and Water Quality) of the DEIR, Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 628-6
The commenter states that the treated water being discharged to South Fork Wolf Creek contains unacceptable toxin levels. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 628-7
The commenter is concerned about the integrity of the underground mine workings. The commenter is referred to Chapter 4.6 (Geology, Soils, and Mineral Resources) of the DEIR and Master Response 29 - Near Surface Workings.

Response to Comment Ind 628-8

The commenter states “80 years, 24/7 operation.” There is not enough information to formulate a specific response. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 628-9

The commenter states the project will result in the loss of property values. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 628-10

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 628-11

The commenter states that the high paying jobs from the generated from the project should come from other industries. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 628-12

The commenter asks what economic benefits the project is bringing to the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 628-13

The commenter urges the County not to approve the project. The commenter’s opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 629

Norema Strongin
12567 Echo Dr. Nevada City CA 95959
530-272-2049

Matt Kelley
Nevada County Planning Dept.
950 Maidu Ave, Ste 170
Nevada City, CA 95959-7902
February 23, 2022

RECEIVED
FEB 28 2022
PLANNING DEPARTMENT

Re: Comments on EIR for Rise Gold Mining Project

Dear Mr. Kelley,

I am a retired attorney who has lived in Nevada City for 14 years. I have reviewed the Draft EIR and have the following comments.

Ind 629-1

1. As noted in the EIR, "The much larger mineral rights boundary encompasses approximately 2,585 acres" this land is under our little mountain community, where we live, work and recreate. The vast size of the proposed project will inevitably have many negative effects on the daily lives of the people that live here. This fact places on you the obligation tomake a thorough, independent review of everything presented by Rise Gold.

Ind 629-2

2. First, as to the Centennial Cleanup Project—there are many representations made in this section. However, the underlying issue is: what will our local and county government do if Rise Gold is unable or unwilling to fulfill these promises? What will be the cost to clean up the current hazardous conditions and any future hazardous conditions caused by the proposed mining operation. We know all too well what the consequences are when mines close and the hazardous waste is left for the local government to deal with! Only a multi-million-dollar bond could provide the funds necessary for the County to clean up after this disaster this would cause.

Ind 629-3

3. An essential issue that isn't addressed in the EIR is: what have the consequences been with respect to Rise Gold's projects in other areas? Did they meet all of their obligations? This is a critical question which requires an independent investigation.

Ind 629-4

4. Next, regarding the mining operation there is no doubt based on information in the EIR that this will be a noisy, dirty, industrial operation. Not only will they be mining underground which involves drilling and blasting, but they will be crushing and processing the ore. This proposal presents plans for the construction of "a commercially viable, financeable, major underground gold mine operation that will produce 1,000 tons per day (365,000 tons per year) of gold mineralization." Careful reading of the EIR reveals the many major destructive consequences this mine will have on of native flora and fauna, and more! The weak suggestions regarding possible mitigation are not enough to protect this community. This project will have a more profound affect on our community than any project proposed during my many years as a resident.

Ind 629-5

5. I have read Rise Gold's self-serving promises regarding mitigation of these environmental effects and it is obvious that Rise Gold has no clear plan that could possibly protect the local area from damage. Rise Gold will "monitor" all of these destructive conditions and make "feasible" changes. Even then, their suggested mitigation efforts are insufficient to actually protect the community from the many negative effects of this project. Rise Gold promises to mitigate, when possible, but the truth is, most of the negative effects on our way of life will be impossible to mitigate. For example, they promise to cover their trucks. But that will not stop the negative affects of the noise, traffic, and excessive road wear caused by those trucks! Also, if you want to

see how unsuccessful we have been with covering loads to reduce pollution—just look at the road leading to the Transfer station—all of those loads are required to be covered, but the littering never stops.

Ind 629-6

6. Likewise, Rise Gold represents that it will monitor the ground water in the area, but that doesn't overcome the problem of the extensive water use proposed when we are in a continuing drought with no end in sight! They say that Rise Gold will take measures to provide another source of water for those with wells affected by the project. Exactly what will that consist of? Is that really feasible? What about the local residents that rely on well water for all of their household needs? What will the Board of Supervisors do if Rise Gold finds in impossible to actually supply an alternative water source when their wells dry up? Rise Gold suggests the alternative of giving residents who need water some monetary compensation. How will money help them if there isn't any alternative way for them to replace the water. Furthermore, this will not only affect wells. Our reservoirs have not been sufficiently supplied by snowpack for many years. Our residents need our precious water resources!

Ind 629-7

7. With respect to the "Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project" the EIR doesn't deny that there will be a lot of noise and underground vibration in all areas where the mining and processing will occur. Also, there will be a continuing stream of very heavy, noisy trucks on our roads for years to come. Over and over in the "mitigation" suggestions, Rise Gold promises to monitor these problems and implement unspecified "engineering controls" to correct them. What if it is impossible to mitigate these problems? Has Rise Gold submitted any evidence that these conditions have been successfully removed has been in similar mining operations in other jurisdictions? If it can't be mitigated, Rise Gold promises to cease operations. Then what will the Board do? Will it make exceptions so the mine can continue to operate, or will they insist on fulfillment of these promises, causing Rise Gold to go out of business and leave the local government entities to deal with this defunct project and all of its unmitigated environmental destruction?

Ind 629-8

8. The EIR is full of promises, what if these promises are not kept? What will be the true cost of this project to the people of Nevada County then? I can tell you what will happen if Rise Gold contends that it has sufficiently mitigated the problems because further efforts are not economically feasible. There will be multiple law suits. How much will that cost the County? If we lose these cases—which as a retired lawyer I assure you is always a possibility--what will be the affect on our little town then? If mitigation is either impossible or economically unfeasible how will the Board of Supervisors clean up the remaining mess?

Ind 629-9

9. As you are aware, As **provided in the CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social issues.** In view of the many issues I have raised in this short summary and the numerous other environmental, economic and social issues surrounding this project, there is only one feasible way to prevent this environmental damage and only one responsible conclusion available to the Planning Department. **Reject this project!**

Thank you for your consideration.

Sincerely,

Noremak Strongin

INDIVIDUAL LETTER 629: NOREMA STRONGIN

Response to Comment Ind 629-1
The commenter references the extent of the mineral rights boundary and states that the project will have many negative impacts but does not identify which impacts and does not state how the DEIR is inadequate. The commenter is referred to Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 629-2
The commenter references the Centennial Industrial Site cleanup. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 629-3
The commenter references the Project Applicant's prior mining projects. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 629-4
The commenter references the project's noise-related impacts and impacts to biological resources but provides no additional information needed to formulate a specific response. Noise impacts from the project are analyzed in Chapter 4.10 of the DEIR. Impacts to flora and fauna are analyzed in Chapter 4.4 of the DEIR. The commenter also states that the mitigation measures in the DEIR are not enough to protect the community but provides no specifics or evidence. The commenter is referred to Chapter 4 of the DEIR.

Response to Comment Ind 629-5
The commenter states that the Project Applicant will fail to implement the mitigation measures described in the DEIR but offers no additional information. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility. In addition, the Project Applicant would be required to enter into agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, Mitigation Measure 4.12-6(c).)

Response to Comment Ind 629-6
The commenter is concerned about the project's impacts to groundwater wells, especially in light of the current drought. Chapter 4.8 analyzed impacts to groundwater supplies and the impacts were found to be less than significant after mitigation. The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 629-7
The commenter is concerned about noise produced from operations at the Brunswick site and from project-related trucks. Chapter 4.10 (Transportation) analyzed noise-related impacts and found the impacts associated with the Idaho-Maryland Mine operations and trucking to be less than significant after mitigation. The commenter references the "engineering controls" in Mitigation

Measure 4.10-3 and asks what will happen if the project is not able to mitigate a particular impact. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Regarding the commenter's concerns that the Project Applicant will not mitigate significant impacts consistent with the DEIR, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 629-8

The commenter is concerned that the Project Applicant will not implement the DEIR's mitigation measures. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 629-9

The commenter urges the County not to approve the project. The commenter's opposition to the project is noted for decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 630

Dist 1

Norema and Edward Strongin
12567 Ecko Dr. Nevada City CA 95959
530-272-2049

RECEIVED
MAR 01 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Ave,
Nevada City, CA 95959-7902
February 23, 2022

Re: Comments regarding Rise Gold Mining Project

Dear Supervisors

Ind 630-1 This is the first time we have ever written to any Supervisor, but we think the proposed Rise Gold Mining Project is of such critical importance to the people of Nevada County, especially those in Grass Valley, Nevada City, and the surrounding area, that we must let our voices be heard. We cannot remain members of the "silent majority" any longer.

Ind 630-2 Please make a careful, independent study of the track record of Rise Gold in other mining operations and the effect this mine would have on the quality of life in this area. Don't be fooled by Rise Gold ridiculous claim that it will employ the local people. There are no unemployed miners, mine managers, ore processors etc. in our local area. All but a small handful of these jobs will go to outsiders who will further strain our already stressed residential resale and rental markets. Local people could find themselves priced out of the local market for residential properties for sale or lease.

Ind 630-3 Please do an independent investigation of the actual environmental impact of this project on the local community: road congestion; wear and tear on our roadways, air pollution, use of precious water resources in this time of continuing drought, water pollution, toxic waste from the mine etc. etc. etc. We have personally spoken to about 50 people in our neighborhood and not one of them favors this mine!

Ind 630-4 BEWARE, THE BOARD OF SUPERVISORS IS BEING GIVEN MISLEADING INFORMATION FROM RISE GOLD! Make an independent investigation of all of their representations and we think you will see for yourselves the terrible consequences this project would have on our lovely mountain community. PLEASE DENY THIS APPLICATION!!

Thank you for your consideration.

Sincerely,

Norema Strongin

Norema Strongin

Edward Strongin

INDIVIDUAL LETTER 630: NOREMA STRONGIN

Response to Comment Ind 630-1
This comment is introductory in nature. The comment is noted.

Response to Comment Ind 630-2
The commenter references the reputation of the Project Applicant and claims that the project will not employ local people, but will bring employees from outside the region and increase competition for housing. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 – Operator Responsibility.

Response to Comment Ind 630-3
The commenter urges that an independent investigation be done for the project's various impacts. The DEIR is an independent investigation of the project impact's and was prepared by Raney Planning & Management under direct contract with the County of Nevada. In addition, Raney hired a team of technical experts to peer review the technical studies prepared by the Applicant's team of experts, and the technical studies were revised, as needed, in response to those comments. The commenter references a number of project impacts but does not provide any additional information. Traffic is analyzed in Chapter 4.12 (Transportation) of the DEIR, air quality is analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, and water quality is analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR.

Response to Comment Ind 630-4
The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 631

Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

January 17, 2022

Dear Commissioners Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

My name is Norma Solarz, I live in Grass Valley. I'm writing to state that I am OPPOSED to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation.

Ind 631-1 I understand that the Nevada County Planning Commission will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on approving or denying Rise Corporation. I am familiar with the the reasons given to allow the project or to deny it. I have come to the conclusion that the Rise Gold Mine information, and putative "survey," is intentionally misleading.

Ind 631-2 There is insufficient assurance that the significant negative impacts from re-opening the mine can be adequately mitigated now or in the future. There *will* be unmitigated significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 631-3 There are many reasons this mine should NOT be reopened. Despite the "assurances" given by Rise Corporation there will be permanent problems from de-watering the mine, excessive noise from trucks moving debris 24 hours a day will impact the quality of our lives, there will be damage to public infrastructure due to increased traffic on roads. In the end I do not believe that a "modern" mining operation will provide many jobs for local citizens. I believe the wealth will be taken from the land and our local community will be left again with little if any gain.

Ind 631-4 I am a Nevada County resident and see that the biased "survey" that Rise Gold Corporation touted demonstrates a lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from other Nevada County residents. Please be counted among the people who will stand against the well-funded project and misinformation scheme Rise Gold Mine is putting forth as good faith research. VOTE NO!

Sincerely,

Norma Solarz DDS

800 Freeman Lane #209
Grass Valley CA 95949
510-326-8637
nsolarz@gmail.com



Staff Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

INDIVIDUAL LETTER 631: NORMA SOLARZ

Response to Comment Ind 631-1

The comment expresses a general opinion that the information pertaining to the proposed project, but does not provide specific examples that would allow for a detailed response or specifically address the adequacy of the DEIR. Please see Master Response 1.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 631-2

The comment expresses a general opinion that there is "insufficient assurance that the significant negative impacts…can be adequately mitigation now or in the future" and that there "will be unmitigated significant negative impacts" associated with the project, but does not provide specific examples that would allow for a detailed response or specifically address the adequacy of the DEIR. As noted in Chapter 5 of the DEIR, the proposed project would result in significant and unavoidable impacts related to aesthetics (substantial degradation of the existing visual character or quality of the site and its surroundings), and transportation (intersections of SR 174/Brunswick Road and Brunswick Road/Sutton Way). The DEIR provides substantial evidence that all other impacts would either be less than significant or less than significant with implementation of the mitigation measures incorporated into the DEIR. These mitigation measures will be made enforceable by state law through adoption of the mitigation monitoring and reporting program, included as Chapter 4 of this Final EIR.

Response to Comment Ind 631-3

For concerns regarding dewatering of the mine, please see Master Responses 14 and 15. For the general noise concerns, please see Chapter 4.10, Noise and Vibration. Haul truck noise is addressed in Impact 4.10-2 of the DEIR. Regarding damage to roads, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

For the commenter's opposition to the proposed project, please see Master Response 1.

Response to Comment Ind 631-4

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 632

Dist 3

RECEIVED

FEB 01 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

January 17, 2021

My name is Norma Solarz, I live in Grass Valley. I'm writing to state that I am OPPOSED to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation.

Ind 632-1 I understand that the Nevada County Planning Commission will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on approving or denying Rise Corporation. I am familiar with the the reasons given to allow the project or to deny it. I have come to the conclusion that the Rise Gold Mine information, and putative "survey," is intentionally misleading.

Ind 632-2 There is insufficient assurance that the significant negative impacts from re-opening the mine can be adequately mitigated now or in the future. There *will* be unmitigated significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses.

Ind 632-3 There are many reasons this mine should NOT be reopened. Despite the "assurances" given by Rise Corporation there will be permanent problems from de-watering the mine, excessive noise from trucks moving debris 24 hours a day will impact the quality of our lives, there will be damage to public infrastructure due to increased traffic on roads. In the end I do not believe that a "modern" mining operation will provide many jobs for local citizens. I believe the wealth will be taken from the land and our local community will be left again with little if any gain.

Ind 632-4 I am a Nevada County resident and see that the biased "survey" that Rise Gold Corporation touted demonstrates a lacks concern for our environment and the people who live here. I'm confident that you will value my input and comments from other Nevada County residents. Please be counted among the people who will stand against the well-funded project and misinformation scheme Rise Gold Mine is putting forth as good faith research. VOTE NO!

Sincerely,

Norma Solarz DDS

800 Freeman Lane #209
Grass Valley CA 95949
510-326-8637
nsolarz@gmail.com

INDIVIDUAL LETTER 632: NORMA SOLARZ

Response to Comment Ind 632-1
Please see Response to Comment Ind 631-1.

Response to Comment Ind 632-2
Please see Response to Comment Ind 631-2.

Response to Comment Ind 632-3
Please see Response to Comment Ind 631-3.

Response to Comment Ind 632-4
Please see Response to Comment Ind 631-4.

Individual Letter 633

From: Osher Levi <osherlevi12@gmail.com>
Sent: Sunday, April 3, 2022 7:52 PM
To: Idaho MMEIR
Subject: I vote no for opening the mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 633-1

Instead of digging and disturbing our land, raping it,
let's find more sustainable and supportive ways that show respect to the mother, Mother Earth, treat her with kindness and care.
We are invited to ask ourselfsthe question:
How can we be better stewards of this planet?
Let's ponder on that one.
Peace 💛

--
Sent from Gmail Mobile

1

INDIVIDUAL LETTER 633: OSHER LEVI

Response to Comment Ind 633-1

The comment does not address the adequacy of the DEIR, but expresses general concern regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 634

Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

ASUR PLAN ANALYSIS

PREPARATION OF ASUR PLAN

Ind 634-1

This plan has been developed by Rise Gold, Inc, in response to the comments from the Northern Sierra Air Quality Management District, NSAQMD: "Pursuant to Health and Safety Code section 41511 and the ATCMs (discussed below), the NSAQMD will require that an asbestos sampling plan be developed and approved by the NSAQMD prior to its implementation. It should at least meet the requirements and specifications of ARB Method 435 (see https://ww3.arb.ca.gov/toxics/asbestos/tm435/tm435.htm). This has not been done. No sampling plan has been developed and approved by the NSAQMD." (*Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021*)

Ind 634-2

Rise Gold is listed as the author- no credentialed expert is credited even though they have a PhD Geologist on their team along with several Technical Advisors who are also geologists.

Rise Gold Inc. is incorporated in the state of Nevada. The state of Nevada does not require a license for geologists.

The sampling plan seems to be derived from "Air Resources Board Method 435, Determination of Asbestos Content of Serpentinite Aggregate (1991)". CARB also published the "*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate*" in April 2017 to further elucidate the complexities of asbestos testing in an effort to increase consistency and reliability between laboratories. The document states that: "If all parties involved in the collection, processing, and analysis of potential asbestos containing aggregate follow the guidelines specified in this document, more accurate and repeatable M435 asbestos content measurements will result." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017, pp i-ii*)

Determine what, if any of these recommendations were implemented

Ind 634-3

The sampling and testing will be done by Rise. "Sampling and analytical testing will be done on or off-site by trained and qualified persons under the direction of a State Licensed Geologist" (*ASUR Plan, Item #6, document pg 14 or pg 16 of 131*). Laboratories analyzing asbestos are accredited by NLVAP (National Laboratory Voluntary Accreditation Program). A licensed geologist can work with an Air Pollution Control Officer to identify naturally occurring asbestos (NOA) and create a management plan.

Was the author of the ASUR Plan a California licensed geologist?

So, the parties involved in sampling and testing are not well established as written in the ASUR Plan.

Can the geologist perform testing themselves, train analysts to perform testing or supervise testing? Will any of this work be accepted in a court of law? TBD from a regulatory agency

1

Mossman is not a licensed Professional Geologist or Certified Engineering Geologist in the state of California. None of the following members of the Rise Gold management team could be found in DCA database for licensure: Thomas Vehrs, Bob Gallagher, Mike Andrews, John Carlile or Alan Edwards (all listed as directors or technical advisors: searches performed under EG-Certified Engineering Geologist, GEO-Professional Geologist, GP-Professional Geophysicist, HG- Certified Hydrogeologist, and MT-Metallurgical Engineer categories). They all have extensive experience in mining, especially international work.

Andrew Kopania (author of the *Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project*) along with Vieira and Kull (NV5 authors of the *GeoTechnical Reports for Centennial and Brunswick Industrial Sites*) were located in the DCA database in order to validate search abilities.

The *Asbestos Sampling Memo (June 2020)* was prepared by Richard Lippoth. He collected the samples from Rise, analyzed the laboratory data and prepared the report. No California licensure is found for him under the Board for Professional Engineers, Land Surveyors and Geologists, DCA.ca.gov He is a one man show at Vergence Geo Services, Inc. with his resume listing work with Freeman-McMoRan and Alexco, a shared history with the Rise management team. His qualification described in the *Asbestos Sampling Memo* June 2020 is listed as geologist, Mr. Richard Lippoth, Reg. SME. SME is a professional organization: the Society for Mining, Metallurgy and Exploration.

COMPARISON OF PCM TO PLM TO TEM MICROSCOPY TECHNIQUES

Multiple types of microscopy techniques will be used to analyze asbestos content depending on the application of the results. For instance, airborne asbestos monitoring for miners' exposure will use air filtration capture followed by phase contrast microscopy analysis.

Ind 634-4

Bulk materials will be screened for asbestos using polarized light microscopy followed by transmission electron microscopy analysis for rolling inventory maintenance.

"TEM is the preferred analytical method for outdoor asbestos samples because of its ability to detect small fibers (greater than or equal to 0.0002 microns in diameter) and to distinguish between asbestos fibers and non-asbestos fibers. The term "TEM structures" is often used to describe asbestos fibers detected by this method. TEM is the method recommended by the California Office of Environmental Health Hazard Assessment (OEHHA). However, TEM measurements cannot be directly related to the cancer potency factors because the studies upon which OEHHA's risk assessment was based used PCM analysis. Thus, the TEM measurements must be converted to PCM-equivalent units (OEHHA 2015.)" (*ASUR Plan, document pp 7 or pp 9 of 131*)

"Asbestos content by TEM structures will be converted into equivalent Phase Contrast Microscopy (PCM) units in accordance with the California Office of Environmental Health Hazard (OEHHA) 2015 Air Toxic Hot Spot Guidance Manual." (*ASUR Plan, Item #3, document pp 8 or pp 10 of 131*)

These different analyses each require unique sampling methods, sample preparation, sample sizes, and microscopy techniques. The results are not directly comparable between the methodologies.

PHASE CONTRAST MICROSCOPY (PCM)

Ind 634-5

"The most common methodology used for asbestos air testing is Phase Contrast Microscopy (PCM). This testing method involves using a PCM microscope to count the fibers present on the cassette filter in order to determine if the total fiber concentration is less than the EPA clearance level of 0.01 fibers/cc (fibers per cubic centimeter) "Asbestos sampling protocol cannot be used for objective data – OSHA." https://www.osha.gov/laws-regs/regulations/standardnumber/2015-10-07. Phase contrast microscopy enhances the contrast of transparent materials, while also filtering out background light. The air cassettes used for PCM contain a cellulose ester filter with a pore size of 0.8 um. Once the air sampling is complete, the sample is sent to an accredited laboratory. Alternatively, the samples can be analyzed on-site with a microscope for expediency, but these results will not be accredited. Whether in a lab or on-site, the filter is cut into a pie shape and prepped using a mix of vaporized acetone and triacetin. The sample is then placed on a PCM microscope where the fibers are counted up to 100 fields of view." (www.indoorscience.com, PCM vs TEM Asbestos Air Testing - Indoor Science, March 27, 2018)

Advantages:

- Technique is specific for fibers. It is a fiber counting technique which excludes non-fibrous particles from the analysis
- Technique is inexpensive and does not require specialized knowledge to carry out counts
- Analysis is quick and can be performed on-site for rapid determination of air concentrations of asbestos fibers
- Technique has continuity with historical epidemiological studies so that estimates of expected disease can be inferred from long-term determinations of asbestos exposure

Disadvantages:

- Test does not positively identify asbestos fibers. Other fibers may be included unless differential counting is used
- The smallest visible fibers are about 0.2µm in diameter while the finest asbestos fibers may be as small as 0.02 µm in diameter. For some exposures, substantially more fibers may be present than are actually counted.
- Cannot distinguish fibers less than 5 microns in length and 0.25 microns in width

This method is used for airborne fiber determination, not bulk material. It will probably be used for workers' exposure testing. Since OEHHA asbestos risk assessment has used studies involving PCM analysis, TEM results from bulk testing will be converted to PCM equivalent units.

POLARIZED LIGHT MICROSCOPY (PLM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Sep/17/2019 found in the *Asbestos Sampling Memo June 2020, pp 26 of 32*: "Sample preparation follows a standard CARB 435 prep method. The entire sample is dried at 135-150 C and then crushed to ~3/8" gravel size using a Bico Chipmunk crusher. If the submitted sample is >1 pint, the sample was split using a 1/2" riffle splitter following ASTM Method C-702-98 to obtain a 1 pint aliquot. The entire 1 pint aliquot, or entire original sample, is then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. If necessary, additional homogenization steps are undertaken using a 3/8" riffle splitter. Small aliquots are collected from throughout the pulverized material to create three separate microsope slide mounts containing the appropriate refractive index oil. The prepared slides are placed under a polarizing light microscope where standard mineralogical techniques are used to analyze the various materials present, including asbestos. If asbestos is identified and of less than 10% concentration by visual area estimate then an additional five sample mounts are prepared. Quantification of asbestos concentration is obtained using the standard CALARB Method 435 point count protocol. For samples observed to contain visible asbestos of less than 10% concentration, a point counting technique is used with 50 points counted on each of eight sample mounts for a total of 400 points."

Ind 634-6

This is a generalized description of the PLM analysis method, actual processes are not documented in the Asbestos Sampling Report June 2020 for the individual samples.

Advantages:

- Basic identifications were first performed by light microscopy so there is a large base of published information against which to check analysis and technique
- Analysis is specific to fibers
- Analysis is quick, requires little prep time and can be performed on-site if equipment is available

Disadvantages:

- Not all fibers present may be seen. This is a problem for very low asbestos concentrations where agglomeration or large bundle of fibers may not be present to allow identification by inference.
- Method requires a great degree of sophistication on the part of microscopist. An analyst is only as useful as his mental catalog of images. Therefore, a microscopist's accuracy is enhanced by experience. The mineralogical training of the analyst is very important. It is the basis on which subjective decisions are made.
- The method uses only a tiny amount of material for analysis. This may lead to sampling bias and false results (high or low). This is especially true if the sample is severely inhomogeneous. (heterogeneity)
- Fibers may be bound in a matrix and not distinguishable as fibers so identification cannot be made

TRANSMISSION ELECTRON MICROSCOPY (TEM)

The following method description is excerpted from the Asbestos TEM Laboratories, Inc. cover letter dated Aug/15/2019 found in the *Asbestos Sampling Memo June 2020, pp 21 of 32:* "Sample preparation followed a standard CARB 435 prep method. The entire sample was dried at 135-150 C and then crushed to ~3/8" gravel size. If the submitted sample was >~1 quart, the sample may have been split using a 1/2" splitter following ASTM Method C-702-98 to reduce the sample volume for pulverization. The remaining aliquot, or entire original sample, was then pulverized in a Bico Braun disc pulverizer calibrated to produce a nominal 200 mesh final product. A representative ~60 mg aliquot of material was weighed out, and then placed into solution in a 500 ml beaker filled with distilled water. A known volume of the liquid suspension was filtered onto a 0.2 micron pore size Millipore mixed cellulose ester filter. The filter was then dried in HEPA filtered, Class 100 air on a clean bench. The filter was placed onto a glass microscope slide, sectioned, and collapsed in acetone. The collapsed filter was plasma-etched to remove10% of the filter surface and then carbon coated. The carbon coated filter was sectioned

Ind 634-7

and the sections placed onto 200-mesh copper TEM sample grids in dimethyl sulfoxide and acetone wick washers. After sufficient time to dissolve the filter material, the TEM sample grids were removed from the baths and placed into labeled sample containers.

TEM analysis was performed on a Philips CM-12 or JEOL 1200 transmission electron microscope operating at 80 or 100 kV. The sample was placed into the microscope where it was first scanned at low magnification to confirm that the distribution of material was reasonably homogeneous. High magnification analysis was performed using a two tier approach: 1) A relatively large area of several TEM grid openings for large asbestos fibers or fiber bundles, and 2) a relatively small area of a number of fields of view for individual asbestos fibers (fibrous particles exhibiting an aspect ratio greater than or equal to 3 to 1, and a length greater than or equal to .5 um). Detected asbestiform structures were subjected to detailed morphological and/or selected area diffraction analysis. If necessary, energy dispersive X-ray analysis was also performed. The length and width of each asbestos fiber was measured. From this data, a total volume and mass of asbestos observed in the scanned area is calculated, and extrapolated to a total weight percent asbestos for each sample."

At the top of the same letter is the statement: "Please find below the results for the TEM analysis of one or more bulk material samples. The analytical procedures were performed according to the EPA Test Method For the Determination of Asbestos in Bulk Building Materials - TEM method (EPA 600/R-93/116) modified for quantitative bulk soil sample analysis."

How was this method for bulk building materials modified for bulk soil sample analysis? These are rock cores.

In these analyses, an ~60 mg sample was suspended in 500 ml distilled water. Then a 0.5 ml aliquot was filtered for analysis. While TEM can identify fibers too small to be seen with PLM, the sample size is reduced by order of magnitude, 10 ^{6}.

"Samples are first analyzed using PLM because a much larger (and likely more representative) mass of sample powder is analyzed using PLM than when using TEM. The mass of a M435 sample analyzed by PLM is approximately one million times greater than the mass of a TEM sample, but TEM has a resolving power of 500 to 20,000X magnification (compared to 50 to 1000X magnification by PLM). This higher resolving power enables TEM microscopists to distinguish and identify finer particles and fibers not seen with the use of PLM. For example, the California Department of Toxic Substances Control has used PLM, followed by TEM, as part of a tiered analytical approach to verify the absence of asbestos fibers determined by M435 PLM analyses in its Schools Program." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, April 2017 pp 23-24*)

Ind 634-8

This is a "potential" quantity of mass available for analysis by PLM vs TEM, not the actual mass analyzed.

Advantages:

- Fibers can be accurately identified-ability to distinguish between asbestos and non-asbestos fibers
- Small fibers can be detected

Disadvantages:

- High resolution may be selective for a specific size fiber and exclude others
- Actual amount of material examined is magnitudes less than quantity examined by PLM
- Sample heterogeneity impacts overall representativeness

Bottom line is that these methods are not comparable due to differences in sample preparation and microscopy techniques. These analyses contain inherent bias due to sample variability (lack of homogeneity), differences in sample quantities tested, magnification levels and individual microscopists' expertise.

COMPARISON OF RESULTS FROM ASBESTOS SAMPLING MEMO (June 2020) TO ASUR PLAN TEM RE-TEST (Nov 2021).

Ind 634-9

For the 42 samples analyzed during August and September 2019, asbestos was detected in 4 samples, 9.5% of total samples. This included two blanks, two Centennial site tailings and 38 rock core samples. Two samples were analyzed by TEM and the remaining 40 samples by PLM. Asbestos was found in the two TEM samples and two of the PLM samples.

"In 2021, Rise requested the 40 samples previously submitted to be reanalyzed using the TEM method." (*ASUR Plan, document pp 7 or pp 9 of 131*).

Actually, the TEM reanalyses were performed at the urging of the air district: ["As the NSAQMD wrote in its July 10, 2020 comments "The NSAQMD recommends additional TEM analyses of the above rock types (serpentinite, weakly ankeritized diabase/serpentinite, weakly ankeritized serpentinite and ankeritized serpentinite) in order to facilitate refinement of the preliminary risk assessment". The NSAQMD still sticks to this recommendation"]. (Letter between Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner Nevada County, February 10, 2021)

In retesting of the 40 samples (two tailings and 38 pulp samples) analyzed by TEM, asbestos was detected in 14 samples. Unfortunately, the August 2019 samples tested by TEM were not retested by TEM in 2021. Thus, there is no quality control data regarding variability and reproducibility of results regarding TEM analysis between those two samples. The following chart is a comparison of asbestos found by TEM vs PLM. Detection limit for PLM is 0.25 weight% and the detection limit for TEM is 0.001 weight %. Non-detect samples from TEM re-testing have been excluded.

4

Sample Number	Date Reported	PLM Result weight % Detection Limit 0.25	TEM Result weight % Detection Limit 0.001	% Difference PLM vs TEM	Location and sample drill core length (inch)	PCM equivalent units weight %
Y962827	Sept 17, 2019	<0.25		139	I-19-14 4.8	
	Nov 10, 2021		1.4			0.021
Y962828	Sept 17, 2019	<0.25		120	I-19-14	
	Nov 10, 2021		0.062		3.6	0.0
Y962833	Sept 17, 2019	<0.25		92	I-19-14-A	
	Nov 10, 2021		0.092		3.6	0.0
Y962835	Sept 17, 2019	<0.25		112	I-19-14A	
	Nov 10, 2021		0.071		3.6	0.0
Y962836	Sept 17, 2019	<0.25		15	I-19-14A	
	Nov 10, 2021		0.29		3.6	0.0
Y962837	Sept 17, 2019	<0.25		134	I-18-11 4.8	
	Nov 10, 2021		1.27			0.018
Y962840	Sept 17, 2019	<0.25		50	I-19-14 4.8	
	Nov 10, 2021		0.15			0.001
Y962843	Sept 17, 2019	<0.25		193	Centennial	
	Nov 10, 2021		0.004		tailings	0.0
Y962847	Sept 17, 2019	<0.25		55	I-19-13 13.2	
Duplicate	Nov 10, 2021		0.44			0.028
Y962980	Aug 15, 2019	N/A	3.1	N/A	I-18-11	0.035
	N/A				10.8	
Y962981	Aug 15, 2019	N/A	2.0	N/A	I-19-13 13.2	0.028
	N/A					
Y962991	Sept 17, 2019	<0.25		142	I-18-11	
	Nov 10, 2021		0.042		6.0	0.042
Y962992	Sept 17, 2019	0.75		5	I-18-11 3.6	
	Nov 10, 2021		0.79			0.069
Y962993	Sept 17, 2019	<0.25		198	I-19-13A 4.8	
	Nov 10, 2021		0.0009 (0.001 at 3 sf)			0.003
Y962994	Sept 17, 2019	<0.25		63	I-19-13A 4.8	
	Nov 10, 2021		0.13			0.0
Y962999	Sept 17, 2019	2.5		164	I-19-13A	
	Nov 10, 2021		0.01		4.8	0.038

Overall, 16 samples, 40%, had asbestos greater than the TEM detection limit of 0.001 weight %.

Eight of the 40 samples, 20%, had asbestos >0.01 PCM equivalent units Weight %.

NOTE: sample Y962994 had a TEM result of 0.13 weight % yet zero result for PCM equivalent units. Data was notated: "Actinolite asbestos detected. Concentration per Millions of Fibers per gram: 29 for fibers >5µm in length. Possible contamination." This same situation occurs for samples Y962828, Y962833, Y962835, Y962836 and Y962843.

Two samples for TEM analysis originally sent to the laboratory on Aug 8, 2019 were described as rock cores with date analyzed as Aug 15, 2019. The 40 samples for PLM analysis were described as rock cores and were originally sent to the laboratory on Sept 3, 2019 with date analyzed as Sept 17, 2019. For retesting, 40 samples described as pulverized rock were submitted to the laboratory on Sept 14, 2021 with date analyzed as Nov 10, 2021. The two samples originally tested by TEM, Y962980 and Y962981, were not retested in November 2021. All of these samples were stored somewhere for two years before being retested. The actual age of the samples is unknown since drill core logs are not available. Rise performed exploratory drilling between 2017-2019.

SAMPLE POPULATIONS

Ind 634-10

Not counting the two grab tailings samples from the Centennial Site and the two blanks (carbonate landscape rock), the average overall length of the sample cores tested was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available; therefore, it is impossible to determine the depth or width of serpentinite deposits encountered. Asbestos sampling was extremely limited. Centennial tailings were only identified by a grid number-no information as to quantity, location, depth, etc. There are labeling errors: 1) *Asbestos Sampling Memo June 2020, Appendix A*- First photo is mislabeled Y962880 instead of the correct label Y962980 and 2) sample Y962838 is located on drill hole I-19-12 on Sheet 2

Mine Geology and Asbestos Samples (*Asbestos Sampling Memo June 2020*) but is listed as being from drill hole I-18-12 in the *ASUR Plan, Appendix C, pp 55 of 131.*

DUPLICATE ANALYSIS

Y962847 and Y962981 are duplicate samples. How does a result of 0.44 TEM weight % and 2.0 TEM weight % calculate out to the same PCM equivalent unit result of 0.028 weight%? (*ASUR Plan, Appendix C, document pp 57 of 131*)

These two separate samples Y962981 and Y962847 were quality control duplicates. These were two different samples, Y962981 was initially received as a rock core sample and was only analyzed by TEM on 8.15.19. The results yielded 22 chrysotile structures <5µm and 17 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 2.0 (*Asbestos Sampling Memo, June 2020, Appendix B, pp 23 of 32*).

The duplicate sample, Y962847 was initially received as a pulps sample and was tested by PLM on 9.3.19 with <0.25% result. This sample was retested by TEM on 11.10.2021 and yielded 233 chrysotile structures <5µm and 10 structures ≥ 5µm with a calculated asbestos concentration (weight %) of 0.44 (*ASUR Plan, Appendix B for Asbestos TEM Laboratories Report, pp 110 of 131*).

Ind 634-11

Yet, the ASUR Plan lists these results as identical with the same Structures/nanogram at 3.0 and the same PCM Weight % at 0.028% (*ASUR Plan, Appendix C, pp 57 of 131*)

The weights used for sample preparation are 62.5 mg for Y962981 and 58.9 mg for 962847, a difference of 5.9%. But the difference in calculated asbestos weight concentration is 128%. Sample Y962847 has more than 10 times the number of chrysotile structures.

A 6% lower weight yields a 10 times higher structure count but the same PCM equivalent units????

Only one of these samples was included in the four total samples used to calculate the content in serpentinite samples. Which one? Who picks which one? Can the quality control sample, as a separate sample, be excluded from the analyses? (*ASUR Plan, Appendix C, pp 57 of 131*)

Comparing the results for the duplicate sample, Y962847, by TEM analysis yields 0.44% by weight compared to sample, Y962981 at 2.0% by weight, again yielding a 128% difference. Even using the same analytical test procedure (TEM analysis) yields unsatisfactory QC results.

NOTE: The only definitive conclusion from all of the asbestos testing is that:
asbestos was found in all of the serpentinite samples in addition to being found in samples of weakly ankeritized diabase/serpentinite, weakly ankeritized serpentinite, diabase and porphyrite at levels >0.01% PCM equivalent units (*ASUR Plan, Appendix C, pp 55-57 of 131*).

Grouping the samples by lithology in an effort to dilute the overall asbestos content of the group does not negate the asbestos content of the individual sample and its potential for harm. (*ASUR Plan, Appendix C, pp 54 of 131*)

QUALITY CONTROL ISSUES

The laboratory report for retesting of 40 sample by Asbestos TEM Laboratories, Inc. is labelled Report NO. 375516 rev.1

Why was the report revised? Where is the original for comparison?

Ind 634-12

Per documentation provided, no blind blanks or blind duplicates were performed. No documented cross check verifications from second analyst or second microscope were performed on individual samples. Two analysts performed the 40 sample TEM re-tests. The first analyst tested the first 18 samples, followed by the second analyst for next 13 samples, first analyst again for one sample, second analyst for remaining 8 samples. No time stamp for each sample, thus unable to determine if samples were analyzed in the order listed according to laboratory sample ID.

Two of the TEM samples had grid opening damage, Y962984 and Y962988.

Eight of the 40 samples were notated as having "possible contamination" with two types of contamination listed, chrysotile for two samples and actinolite for 6 samples. Twenty percent of the samples had "possible contamination", 5% by chrysotile and 15% by actinolite.

TOXICITY

Ind 634-13

CHRYSOTILE VS AMPHIBOLE ASBESTOS

What if these samples did not have "possible contamination" but contained actual naturally occurring actinolite (amphibole) asbestos?

6

Upon retesting by TEM, ten samples (25%) indicated amphibole asbestos which has a much higher cancer potency than chrysotile asbestos.

Particularly controversial is the question of whether chrysotile asbestos is less potent for the induction of lung cancer than the amphibole forms of asbestos (e.g. crocidolite, amosite and tremolite), which has sometimes been referred to as the "amphibole hypothesis" (Cullen, 1996; Stayner et al., 1996; McDonald, 1998). This argument is based on the observation from experimental studies that chrysotile asbestos is less biopersistent (i.e. has a shorter half life) in the lung than the amphiboles... [The Working Group noted that the lower biopersistence of chrysotile in the lung does not necessarily imply that it would be less potent than amphiboles for lung cancer.] https://www.ncbi.nlm.nih.gov/books/NBK304374/

"The amphiboles are more likely to be associated with mesothelioma than is chrysotile, or white asbestos, which has a two to four times less potent risk of mesothelioma: however, the risk for development of lung cancer is equipotent for all types of asbestos. Chrysotile accounts for more than 99% of the world production of asbestos and commonly is contaminated with tremolite and other asbestos fibers." (Walker MD, Christopher, Pleural Neoplasms, Muller's Imaging of the Chest, 2019 Retrieved from ScienceDirect.com 02.22.2022)

POTENTIALLY TOXIC ELEMENTS

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases." https://doi.org/10.1016/j.chemgeo.2020.119896

Ind 634-14

"Iron ions on amphibole types of asbestos react with epithelial lining fluid in the lung and generate reactive oxygen species that induce toxicity, and oxidant stress may lead to DNA damage. There is a direct relationship between biopersistence, which is determined by fiber length and chemical composition, and toxicity. Longer, thinner fibers are more toxic because they are not cleared by the AMs and therefore persist in the lung. Fibers longer than 15μm are particularly toxic and bioactive. They are not completely engulfed by the macrophages, leading to release of lysosomal contents, cytotoxicity, oxidant stress, and stimulation of inflammatory and growth factor pathways." (Harkema...Haschek, Fundamentals of Toxicologic Pathology, Chapter 14-Respiratory System (Third Edition), 2018 pp 351-393. Retrieved from ScienceDirect 02.22.2022 https://doi.org/10.1016/B978-012-809841-7.00014-9)

Many of these samples have high metals content, especially iron. Chart this

Ind 634-15

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (Inorganic Extended Qualifier Reports pp. 389-407 and 458-484, Appendix D, Groundwater, Hydrology and Water Quality Analysis Report-Appendices)

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. These analyses were performed in November 2019. This means that all samples were tested at least 9 months beyond their expiration date, probably more.

Shouldn't valid data be used when evaluating the health risks to the community from these TACs, especially when these metals have to ability to potentiate the effects of asbestos?

MATERIAL SAMPLING LOGISTICS

"The sampling will be done from the transfer point between the skip and silo and may be taken either manually or with an automated sampler." Illustrated by Figure 2 (*ASUR Plan, document pp 14 or pp 16 of 131*)

Ind 634-16

According to correspondence between the Air Pollution Control Officer of NSAQMD and Matt Kelley, Senior Planner of Nevada County on February 10, 2021, the APCO states: "A key component of method 435 is the protocol for collecting representative samples. It is improper to simply pull out the laboratory portion of Method 435 and say that Method 435 is being used. Method 435 states, "1.2 Applicability. This method is applicable to determining asbestos content of serpentine aggregate in storage piles, on conveyor belts, and on surfaces such as roads, shoulders and parking lots." Then it specifies even more clearly, "3 APPLICABLE SOURCES. This method can be used to obtain bulk material sources from three types of sources: 1. Serpentine aggregate storage piles. 2. Serpentine aggregate conveyor belts 3. Serpentine aggregate covered surfaces...In aggregate, a large degree of homogeneity has already been achieved during the aggregate's production."

Does pulling samples at the skip drop point into the silo meet the above stipulated criteria for Method 435 sampling, does this method qualify as a conveyor belt?

Ind 634-17

Who would be in the silo at point 3 in diagram as shown on document pp 14. (*ASUR Plan*) to obtain a sample manually?

Ind 634-18

"It is recommended that sampling be done at point closest to end of processing." (*IMPLEMENTATION GUIDANCE DOCUMENT Air Resources Board Test Method 435 Determination of Asbestos Content of Serpentine Aggregate, pg ii*).

7

This point in the silo may be adequate for barren rock samples but not tailings samples comprised of ore rock regarding the "point closest to end of processing," as stated above.

What will be the timing/spacing of the individual 3 samples taken for each composite per 1000 tons? Beginning, middle, end or every 333 tons? Beginning and end sampling method would mean that samples would overlap (beginning, end) and (end, beginning) samples per 1000 tons. Weighting sampling at these points would not be representative of the entire batches.

Will barren rock and ore rock be analyzed separately or combined in a composite (3 samples will be composited per 1000 tons of rock each day (*ASUR Plan, document pp 13 or 15 of 131*)? If barren rock and ore rock are to be placed in different compartments of the concrete silo, how will you be able to determine which material is contaminated, if asbestos content >0.01% PCM equivalent units is later found in the rolling inventory?

Ind 634-19

The concrete silo is divided into three compartments, one 1000 tons area and two 400 tons containment areas. The ore rock would flow through the larger compartment and then be conveyed to the ore processing plant for pulverization into tailings, while the barren rock would be loaded into haul trucks for transport.

How would you determine if the contaminated material was from the ore rock or the barren rock if the composited sample contains both materials? Rise would have to assume that all material from last non-detect test (per 1000 tons batch) to the next non-detect test (per 1000 tons batch) is contaminated.

Using a weighted average taken over three months of 1000 tons per day ore rock (90,000 tons) and 500 tons per day barren rock (45,000 tons) allows for significant dilution of asbestos per batch. Will an individual batch that fails TEM analysis be allowed to remain among the passing TEM analyses batches?

ROLLING INVENTORY MAINTENANCE LOGISTICS

Pg 13 (pp 15 of 131), ASUR Plan item 4: "Analytical determination of a materials status as Asbestos Containing Material would be done using Polarized Light Microscopy (PLM) in accordance with ARB Method 435 pursuant to 17 CCR 93106 (h)(2) with a detection limit of 0.25% asbestos"

Pg 13 (pp 15 of 131), ASUR Plan item 5: "Analytical determination of asbestos content, for the purposes of maintaining an Asbestos Inventory, would be done using Transmission Electron Microscopy (TEM) method in accordance with the EPA/600/R-93/116 method. Sampling for the Asbestos Inventory would be done by compositing at least 3 random grab samples from the barren rock or sand tailings for every 1000 tons of material."

Ind 634-20

But on page 8 (pp 10 of 131) of the ASUR Plan are the statements:

4) An Asbestos Inventory of all mined materials will be maintained and include a 3-month rolling average of asbestos content in equivalent PCM units.

5) An Engineered Fill Placement Plan will be maintained to ensure that adequate non-Asbestos Containing Material, as determined by PLM testing, is available for Surfacing Applications.

If all mined material is tested by TEM and converted to PCM equivalent units, then how can Rise maintain an Engineered Fill Placement Plan based just on PLM testing? There is no comparison or conversion factors of PLM measurements to TEM measurements. (Only TEM measurements are used to convert to PCM equivalent units)

"A rolling three-month weighted average of asbestos content of mined materials brought to surface and materials used as Engineered Fill will be maintained in the Asbestos Inventory. (*ASUR Plan, document pp 15 or 17 of 131*)."

"Arrangements will be made to ensure that analytical data is received and entered into the inventory within 2 weeks of sampling" (*ASUR Plan, pp 15 or 17 of 131*)

Ind 634-21

Will a new weighted average be calculated with each 1000 tons of material added to the inventory? WHERE WILL THIS MATERIAL BE STORED? WILL 1000 TON INDIVIDUAL BATCHES OF ORE ROCK ALONG WITH 500 TONS INDIVIDUAL BATCHES OF BARREN ROCK BE MAINTAINED? HOW MUCH MINING WILL BE PERFORMED DURING THAT TWO WEEKS OF TURN AROUND TIME? HOW WILL THE AMOUNT OF "POSSIBLY CONTAMINATED" MATERIAL BE DETERMINED?

For example, Y962847, would have initially passed the screening PLM method of testing. However, the material would have failed when tested by TEM during rolling inventory. Material surrounding this sample in the 90-day rolling inventory would be unfit for engineered fill or aggregate transport.

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WILL THE SAME SAMPLE ANALYZED BY PLM BE RE-TESTED USING TEM OR WILL RANDOM SAMPLES FOR EACH TEST (PLM and TEM) BE UTILIZED?

FUGITIVE DUST EMISSIONS ABOVEGROUND

Ind 634-22

The 3-month rolling inventory will consist of 1000 tons of tailings for engineered fill per day multiplied by 90 days equals 90,000 tons plus 500 tons of barren rock for engineered fill per day multiplied by 90 days equals another 45,000 tons. 500 tons of tailings will be deposited underground in CPB.

How will the 500 tons designated for CPB be determined? How will this material be culled from the rolling inventory? (Assuming that any tailings containing asbestos would be the most suitable for underground CPB placement)

Ind 634-23

Where will this 135,000 tons of materials be stored and how will it be loaded for transport to Centennial, Brunswick or outside vendors? Have the fugitive dust emissions for the storage and loading been calculated and included in PM emissions analysis and incorporated into Health Risk Assessment model?

Ind-24

The Air Quality Report calculates emissions based on loading from an enclosed area: "Barren rock will be transported from the concrete silo using a series of chutes and conveyors to a fully enclosed truck loading building." (*Air Quality and Greenhouse Gas Emissions Analysis, Appendix B, Health Risk Assessment, Earthwork and Material Handling Nov 2021, document pp 24*) This statement does not account for rolling inventory procedures.

Ind 634-25

On document page 35, *Noise and Vibration Report, Rock Bin Conveyors and Barren Rock Loading* is the statement:
"The existing concrete rock silo will be reused. A chute and conveyor system will transfer barren rock from the silo into trucks for transport as engineered fill. The conveyor system and truck loading area will be inside a building adjacent to the headframe. A chute and covered conveyor system, approximately 335 feet long, will transfer gold mineralization from the silo to the process plant."

On document page 11, *Centennial GeoTechnical Report*: "The conveyor system and truck loading area will be inside a small building adjacent to the headframe."

On document page 14, *Centennial GeoTechnical Report, Table 4, Buildings* lists the Rock Truck Loading building as 1700 square feet with a maximum height of 20 feet.

Is the building large enough to accommodate the 45,000 tons of barren rock rolling inventory and room for front-end loading into haul trucks from that inventory? What is the ventilation system for this building?

Ind 634-26

On document page 36 *Noise and Vibration Report, Process Plant* is the statement:
"Gold mineralization hoisted from the Brunswick shaft will be placed in the existing concrete silo located on the Brunswick property before processing begins. Gold material will be transported from the concrete silo using chutes and conveyors to a fully enclosed process plant....Sand tailings (waste) from the gold recovery process will be dewatered and used for either backfill for the underground mine or stockpiled for transport and use as engineered fill. Sand tailing during backfilling will be transferred to the paste backfill plant, where particles will be dewatered and mixed with cement into a paste....Sand tailings not used for backfill will be either directly loaded into trucks in the process plant or stockpiled inside the building. Stockpiled sand tailings will be loaded into transport trucks with a front-end loader during daytime hours. Sand tailings not used as underground backfill will be transported for use as engineered fill."

(Document pp 39, *Noise and Vibration Report, Table 9 Hours of Operation*):
"Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years"

(Document pp 17, *Applicants Project Description, Table 7, Hours of Operation*):
"Outside Truck Loading by Loader 7:00 AM-7:00 PM, 7 Days a Week, 80 years"
This is confirmation of "outside loading" across documents.

Will this loading occur inside or outside? Will it be stockpiled inside or outside? If these procedures change due to maintenance of rolling inventory storage: will noise levels increase, will amounts of fugitive dust increase? What is the potential for all equipment and storage areas to be contaminated with asbestos? What level of asbestos found by TEM testing in the 90 day rolling inventory will trigger decontamination of all equipment: conveyor belts, processing plant, cement plant, etc.?

Ind 634-27

Will these two components of the engineered fill be kept separate? Otherwise, how will the engineering firm determine correct ratios for mixing to ensure stability upon engineered fill placement?

Recommendations from NV5:
"2. Crushed blast rock with a maximum dimension of 6 inches may be blended into the sand tailings to produce engineered fill material at a ratio of up to 2 parts blast rock to 1 part sand tailings. A rock and sand ration greater than 2:1 may be feasible but would not likely be testable using nuclear methods.
4. Onsite blending of blast rock and sand tailings may be performed by earthwork equipment (e.g., windrowing and spreading the rock and sand together in thin lifts). Specific procedures for onsite blending should be developed in conjunction with an NV5 representative during initial fill placement." *Centennial GeoTechnical Report*, document pp 13

9

Document pp 16. *Centennial GeoTechnical Report*: "Engineered fill may be mixed on site using mobile equipment to ensure uniformity and meet specifications for compaction."

FUGITIVE DUST EMISSIONS UNDERGROUND

Ind 634-28

"The walls and roof of tunnels composed of rock containing significant asbestos will be covered with shotcrete and the floor with be covered with either concrete or 3 inches of non-Asbestos Containing Material. Shotcreting would be done as part of the tunneling cycle or after completion of tunneling. Floor covering would be done after completion of tunneling (*ASUR Plan, document pg 10 or pp 12 of 131*)."

How much cement does this add to mine operations and subsequent GHGs? Hexavalent chromium deposition? What level of asbestos is considered significant to warrant shotcrete?

Ind 634-29

DEIR pg 3-38 Lists a "Shotcrete Machine" that will "Spray concrete into the walls of the galleries to prevent rockfall." Is shotcrete to be used on all tunnels and not just significant asbestos areas?

"Water generated from drilling and dust suppression during tunneling in Asbestos Containing Material shall be collected in sumps or tanks and shall not be used for Surfacing." (*ASUR Plan, document pp 11 or pp 13 of 131*)

Ind 634-30

(*ASUR Plan, document pp 12 or pp 14 of 131*): "#6. Rock loads will be wetted for transit between the tunnelling and dumping area and equipment will be washed regularly to prevent dust from being tracked out into other areas of the mine."

How will this water be treated to remove asbestos? What will be the volume of asbestos contaminated water?

MERV 16 filters will remove 95% of fibers...that still leaves 5 % ... Rise claims that only 1% of material mined will be serpentinite.

Will MERV 16 filters be limited to serpentinite mining only? What type of filters will be utilized in main ventilation system? What is the quantity of asbestos in the 5% of what total mined quantity of serpentine/serpentinite?

Ind 634-31

The *Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust Nov 2021 pp 300* of 1938 states that the Serpentinite Content of Mine Fill will be 14.3% with an Asbestos content of serpentinite at 0.20%.

The final total is 0.03% (14.3% x 0.20% = 2.86% ÷ 100 = 0.03%) ???????

HOW CAN THE MINE FILL BE 14.3% SERPENTINITE IF ONLY 1% OF MINED MATERIAL IS SERPENTINITE?

ENFORCEMENT OF ROLLING INVENTORY ASBESTOS CONTENT

"If the three-month rolling Asbestos Inventory for materials hoisted to the surface exceeds 0.01% asbestos by mass of PCM equivalent units the geology department will immediately investigate the source of the asbestos containing material and halt mining in the area of concern until a revised mine plan is prepared in compliance with the ASUR Plan (*ASUR Plan, document pp 20 or pp 22 of 131*)."

Document page 9. ASUR Plan needs further interpretation/clarification:

Ind 634-32

"If planned mining is projected to result in the Asbestos Inventory 3-month rolling average to exceed 0.01% by mass equivalent PCM units (1.07 TEM structures per nanogram)

i. Gold mineralization (intended for processing) will <u>not</u> be mined
ii. Barren rock from tunneling will either not be mined or mined using an auxiliary ventilation and dust collection system, as described in Section 6.1, designed to capture dust generated during the mining of these materials and prevent this dust from entering the main ventilation system and exhausting from the underground mine and a location for the underground disposal of this material will be specified and annotated on mine development plans."

SO, IF YOU ARE NOT GOING TO REMOVE THE GOLD MINERALIZATION, WHY WOULD YOU REMOVE THE BARREN ROCK SURROUNDING IT?

(*ASUR Plan, document pp 14 or pp 16 of 131*): "Records of all analytical testwork conducted will be retained for the life of the operation or a minimum of 7 years."

Ind 634-33

Once in the environment, asbestos does not degrade and will continuously be released into ambient air by wind or any soil disturbance.

Records must be kept on exposure monitoring for asbestos for at least 30 years, and worker medical surveillance records retained for the duration of employment plus 30 years (OSHA).

Worker exposure occurs only during employment hours; however, community exposure occurs 24 hours per day. Workers choose to work in this environment with financial compensation. Workers are also provided training, respiratory protection, monitoring and health benefits while the community has none of these advantages.

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The life of the operation or 7 years of record retention is not an adequate retention period since disease caused by exposure may not manifest for 20 years-these are human lives at stake NOT TAX RECORDS!

DUE TO IMPLICATIONS FROM LONG TERM EXPOSURE TO ASBESTOS, RECORDS OF ALL ANALYTICAL TESTWORK MUST BE RETAINED INDEFINITELY.

(*ASUR Plan, document pp 19 or 21 of 131*): #10; If required by the NSAQMD, the plan must include an air monitoring component."

(*ASUR Plan, document pp 20 or pp 22 of 131*): "A geological report will be prepared annually with a summary of all materials mined. The report will include a summary of quantities of rock mined by lithology. The report will include analytical asbestos sampling data and all receipts issued for Engineered Fill. The report will include any dust sampling taken during operations. The report will include the results of any air monitoring or asbestos bulk sampling conducted at the request of NSAQMD."

Ind 634-34

A team of third-party licensed geologists should be monitoring and recording the above data every day to be utilized for reporting. The majority of this work is being performed underground...who will know the difference after the material is extracted, crushed and placed as engineered fill or hauled away?

BESIDES A REPORT, WHAT ACTIONS WILL BE TAKEN? ARE THERE ANY PENALTIES FOR EXCEEDENCES?

Is this plan legally enforceable? What if Rise obtains all the necessary permits to begin mining and decides to sell those permits to a third party or what if Rise sells the mine itself to a third party in the future...will the plan be required for the new operator?

Rise has stated that they will leave the infrastructure at the Brunswick site.

What assurances does the county have that the infrastructure will be clean and free from asbestos, heavy metals and silica contamination?

CONCLUSIONS:

The addition of the 3-month rolling inventory complicates downstream processes tremendously. It has the potential to affect air quality through increased fugitive dust emissions which increase the quantities of the TACs (asbestos, silica and heavy metals) being released directly impacting the Health Risk Assessment results. The health of the community is at stake.

Ind 634-35

Asbestos emissions are now being calculated on the assumption that rock material will contain 0.01% asbestos as described by the ASUR Plan. However, the ASUR Plan cannot control the actual asbestos content in the material being mined, the plan can only try to control the distribution of material being used for engineered fill to a 0.01% asbestos content. The actual asbestos content of rock being mined is unknown and highly variable.

CAN YOU ASSUME THAT ALL MATERIAL (BARREN ROCK AND ORE ROCK) WILL BE ONLY 0.01% ASBESTOS WHEN CALCULATING EMISSIONS?

CLASSIFICATION AND QUANTIFICATION IS NOT POSSIBLE UNTIL AFTER TESTING BY TEM OCCURS, AND THAT INFORMATION MAY NOT BE KNOWN UNTIL TWO WEEKS AFTER EXTRACTION AND TRANSPORT TO THE SURFACE.

"The average asbestos content of the total mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein." (*Air Quality and Greenhouse Gas Emissions Analysis Nov 2021, document pp 36*) Rise now estimates these emissions at 0.01%.

This is the same logic regarding acute vs long term exposure for the community. "Asbestos is classified as a known human carcinogen by the US state, federal, and international agencies, as well as by the World Health Organization" (Walker). There is no safe level of asbestos exposure (*WHO*).

ANY asbestos released to the ambient environment regardless of an immediate quantity released has the potential for long term implications because asbestos does not readily degrade once in the environment. "It is one of the most pervasive environmental hazards in the world. (Walker) "We know very little about the rates of weathering and leaching of asbestos in soil environments, but the available information suggests that substantial reductions in the amount of chrysotile may take hundreds or thousands of years, depending on the soil environment, and somewhat longer for amphibole asbestos." (*GUIDELINES FOR GEOLOGIC INVESTIGATIONS OF NATURALLY OCCURRING ASBESTOS IN CALIFORNIA, Special Publication 124, 2002 pp 24*)

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Thank you,

Pam Heard RRT

Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

HEALTH RISK ASSESSMENT CRITIQUE:

Community Health Risks from Exposure to Toxic Air Contaminants

Ind 634-36

"As explained in Section 2.1.2.2, Non-Criteria Air Pollutants, of the AQ-GHG Technical Report, a TAC is an air pollutant, identified in regulation by CARB, which may cause or contribute to an increase in deaths or serious illness, or which may pose a present or potential hazard to human health...Health effects to TACs may occur at extremely low levels and it is typically difficult to identify levels of exposure which do not produce adverse health effects. "(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B Memorandum, Subject: Idaho-Maryland Mine-Health Effects from Criteria Air Pollutants, pg 10, 2021*)

"A dispersion modeling analysis was conducted for DPM emitted from diesel vehicles and off-road equipment, blasting emissions, as well as for TACs from fugitive dust sources on the proposed project site for the HRA to assess the health risk impacts of the project's construction and operation on proximate off-site sensitive receptors." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 8, 2021*) "The cancer risk calculations were performed by multiplying the predicted dispersion modeled output data by the TAC emissions and the appropriate risk values...The noncancer health impact of an inhaled TAC is measured by the hazard quotient, which is the ratio of the ambient concentration of a TAC in units of µg/m3 divided by the reference exposure level (REL), also in units of µg/m3." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 4, 2021*)

"For evaluating health risk, the HRA was based on the assumption that exposure from construction and operational TAC emissions would generally occur up to 20 hours per day, 7 days per week for construction and up to 24 hours per day, 7 days per week, for 30 years for operation. This is consistent with OEHHA's guidance for performing operational HRAs.1" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 1, 2021*)

The Idaho-Maryland Mine Project permit is for 80 years, almost three times the 30 years of exposure used in the health risk assessment.

WHAT WILL BE THE IMPACT ON HEALTH AFTER THOSE 30 YEARS OF EXPOSURE AND BEYOND?

1

This critique will examine input data points used in the AERMOD dispersion model whose output data then predicts the health risk impacts to the community from exposure to toxic air contaminants.

AERMOD MODEL

Regarding the selected dispersion model and its inputs is the statement -"Principal parameters of AERMOD for the project operations included the following:

- Dispersion Model
- Meteorological Data
- Urban and Rural Options
- Terrain Characteristics
- Sensitive Receptors
- Source Release Scenario
- Buildings" (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pp 8-12, 2021*)

Several of these principal parameters require additional scrutiny with regards to the actual inputs used in the model and their applicability to the Grass Valley community in terms of future health risks.

Ind 634-37

Air pollutant dispersal is dependent on several factors: wind speed, wind direction, atmospheric stability and topography. (Transport and Dispersion of Air Pollution, Chapter 3, www.3epa.gov)

Atmospheric stability is dependent on the forces that relate to the vertical movement of air such as air density, air pressure, temperature and relative humidity. These forces dynamically interact on a constant basis to affect turbulence and the subsequent dispersal patterns of pollutants. It becomes critical to obtain the most accurate meteorological data available for input into these models which then estimate the health risks for cancer along with acute and long-term illness from exposures.

METEOROLOGICAL DATA

From the EPA Support Center for Regulatory Atmospheric Modeling (SCRAM) Air Modeling-Observational Meteorological Data: "Observed meteorological data for use in air quality modeling consist of physical parameters that are measured directly by instrumentation and include temperature, dew point, wind direction, wind speed, cloud cover, cloud layer(s), ceiling height, visibility, current weather, and precipitation amounts. These data are used in air quality models to capture the atmospheric conditions occurring at a source and/or receptor location, and therefore, play an important role as they effect the concentration of pollutants at receptors of interest." (www.epa.gov/scram/air-modeling-observational-meteorological-data, retrieved 1.27.2022)

The HRA states: "The nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away) and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction (Meteoblue 2020). The Blue Canyon met station has a predominant wind direction from the North-East and South; the Auburn met station from the East; and the Beale station from the South-East and North-West (CARB 2020)." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 12*)

"Blue Canyon was selected since it is the closest station and is the most representative of the project site. "(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk*

2

Assessment, Appendix B, pg 12, 2021) There are multiple reasons why Blue Canyon is NOT representative of the project site in terms of meteorological conditions.

Blue Canyon is in the Sierra Nevada Mountains at an elevation of 4695 ft. This elevation creates a very different climate and weather patterns than what Grass Valley experiences in the foothills at an elevation of 2411 ft. Simply changing the terrain elevation data input does NOT correct for the differences in air density, air pressure, solar heating and dry/wet adiabetic lapse rates that result from the significant disparities between Grass Valley and Blue Canyon meteorological conditions.

The website, MeteoBlue states: "Climate Grass Valley 39.22°N 121.06°W The meteoblue climate diagrams are based on 30 years of hourly weather model simulations and available for every place on Earth. They give good indications of typical climate patterns and expected conditions (temperature, precipitation, sunshine and wind). The simulated weather data have a spatial resolution of approximately 30 km and may not reproduce all local weather effects, such as thunderstorms, local winds, or tornados."(Meteoblue. 2020. Climate Grass Valley. (Accessed September 2020. https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/grass-valley_united-states-of-america_5353775.)

NOTE: 30 km=18.641 miles The MeteoBlue site is not specific to Grass Valley with a spatial resolution of 30 km. A comparison of downloads in Meteoblue from both locations, Blue Canyon and Grass Valley, shows identical graphic measurements for ALL parameters:

- Average temperatures and precipitation
- Cloudy, sunny and precipitation days
- Maximum temperatures
- Precipitation amounts
- Wind speed
- Wind rose

Because of the 30 km resolution, Meteoblue makes zero distinction between Grass Valley and Blue Canyon weather patterns.

In the Air Quality Report, the consultant utilizes multiple quotes from various county documents, agencies and websites to substantiate his climate and weather claims. For the sake of argument, this critique uses data downloaded from WeatherSpark.com to compare Grass Valley to Blue Canyon meteorology. This website uses the same databases to compare the two locations.

The data for Grass Valley CA is based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016 (36 years total). The stations contributing to this reconstruction are: Nevada County Air Park (/y/149703/Average-Weather-at-Nevada-County-Air-Park-California-United-States-Year-Round) (67%, 5.0 kilometers, east); Auburn Municipal Airport (/y/145263/Average-Weather-at-Auburn-Municipal-Airport-California-United-States-Year-Round) (24%, 29 kilometers, south); and Beale Air Force Base (/y/145271/Average-Weather-at-Beale-Air-Force-Base-California-United-States-Year-Round) (9%, 33 kilometers, west).

The WeatherSpark data source for Blue Canyon illustrates the typical weather at Blue Canyon-Nyack Airport, based on a statistical analysis of historical hourly weather reports and model reconstructions from January 1, 1980 to December 31, 2016.

3

OTHER DATABASE COMMONALITIES FOR WEATHERSPARK

All data relating to the Sun's position (e.g., sunrise and sunset) are computed using astronomical formulas from the book, Astronomical Algorithms 2nd Edition (https://www.amazon.com/Astronomical-Algorithms-Jean-Meeus/dp/0943396611), by Jean Meeus.

All other weather data, including cloud cover, precipitation, wind speed and direction, and solar flux, come from NASA's MERRA-2 Modern-Era Retrospective Analysis. This reanalysis combines a variety of wide-area measurements in a state of-the-art global meteorological model to reconstruct the hourly history of weather throughout the world on a 50-kilometer grid.

Land Use data comes from the Global Land Cover SHARE database, published by the Food and Agriculture Organization of the United Nations.

Elevation data comes from the Shuttle Radar Topography Mission (SRTM), published by NASA's Jet Propulsion Laboratory.

Names, locations, and time zones of places and some airports come from the GeoNames Geographical Database.

Time zones for airports and weather stations are provided by AskGeo.com.

Maps are © Esri, with data from National Geographic, Esri, DeLorme, NAVTEQ, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, and iPC

THE NEVADA COUNTY AIR PARK REFERENCED AS THE WEATHERSPARK SOURCE IS 4000 FEET NE OF THE BRUNSWICK SITE AS THE CROW FLIES.

GRASS VALLEY

There is an average 10°F higher temperature differential every month of the year in Grass Valley. This conclusion has been verified on WeatherSpark and the Western Regional Climate Center databases. For example, the hot season lasts for 3.1 months in Grass Valley, from June 15 to September 18, with an average daily high temperature above 81° F. In Blue Canyon there is no hot season. The warm season there lasts for 2.9 months, from June 20 to September 18, with an average daily high temperature above 72°F. Average hourly temperatures also vary dramatically between the two locations.

Regarding precipitation: annually Grass Valley receives 53.2 inches rainfall vs 67.5 in Blue Canyon; and annually Grass Valley receives 8.4 inches snowfall vs 240.40 inches snowfall in Blue Canyon.

Wind directions also display wide variances between the two locations. This section discusses the wide-area hourly average wind vector (speed and direction) at 10 meters above the ground. The wind experienced at any given location is highly dependent on local topography and other factors, and instantaneous wind speed and direction vary more widely than hourly averages.

The average hourly wind speed in Grass Valley does not vary significantly over the course of the year, remaining within 0.5 miles per hour of 5.7 miles per hour throughout.

The predominant average hourly wind direction in Grass Valley varies throughout the year. The wind is most often from the south for 7.4 months, from February 10 to September 21, with a peak percentage of 55% on August 11. The wind is most often from the east for 4.6 months, from September 21 to February 10, with a peak percentage

of 49% on January 1. (https://weatherspark.com/y/1178/Average-Weather-in-Grass-Valley-California-United-States-Year-Round)

BLUE CANYON

In Blue Canyon, the average hourly wind speed at Blue Canyon-Nyack Airport experiences *mild* seasonal variation over the course of the year.

The *windier* part of the year lasts for *4.3 months*, from *November 19* to *March 30*, with average wind speeds of more than *5.2 miles per hour*. The *windiest* month of the year at Blue Canyon-Nyack Airport is *December*, with an average hourly wind speed of *5.7 miles per hour*.

The *calmer* time of year lasts for *7.7 months*, from *March 30* to *November 19*. The *calmest* month of the year at Blue Canyon-Nyack Airport is *May*, with an average hourly wind speed of *4.8 miles per hour*.

The wind is most often from the **south** for 3.7 months, from January 31 to May 21; for 3.4 weeks, from August 18 to September 11; and for 1.1 months, from November 3 to December 7, with a peak percentage of 48% on March 2. The wind is most often from the **west** for 2.9 months, from May 21 to August 18, with a peak percentage of 41% on July 18. The wind is most often from the **east** for 1.7 months, from September 11 to November 3 and for 1.8 months, from December 7 to January 31, with a peak percentage of 41% on October 20. (weatherspark.com/y/145297/Average-Weather-at-Blue-Canyon-Nyack-Airport-California-United-States-Year-Round#)

The Brunswick Industrial site is located just southeast of Grass Valley. This means that the winds will transport all pollutants to the north and west toward the Brunswick Basin and downtown.

It is interesting to note that in Blue Canyon, the wind is blowing east during the hottest part of the year, May 21 to August 18. This input into AERMOD would not correlate with Grass Valley wind data under any circumstances.

These differences in weather variables must be taken into account during HRA modeling since the project will be located in Grass Valley not in Blue Canyon. Using Blue Canyon meteorological data is NOT representative of Grass Valley.

The meteorological input data, AERMET, is designed to accept data from any of the following sources: 1) standard hourly National Weather Service (NWS) data from the most representative site; 2) morning soundings of winds, temperature, and dew point from the nearest upper air station; and 3) on-site wind, temperature, turbulence, pressure and radiation measurements. AERMET can process commercially available or custom on-site meteorological data. (www.weblakes.com/guides/aermod/section8/8_1

SHOULDN'T METEOROLOGICAL DATA MORE REPRESENTATIVE OF GRASS VALLEY BE USED FOR THE HEALTH RISK ASSESSMENT?

Ind 634-38

WINDBORNE PARTICULATE MATTER

The following tables are based on Stoke's Law for Fluid Particle Forces and EPA Inhalable Dust definitions and calculations:

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Table 1: 10-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	0.55
6.2	1.1
12.4	2.3
24.8	4.6
37.3	6.9
49.7	9.2

Table 2: 5-micron particle

Wind Speed (mph)	Distance Traveled (miles)
3.1	2.2
6.2	4.5
12.4	9
24.8	18
37.3	27
49.7	36.1

(http://toxsci.oxfordjournals.org/content/65/1/7.full (including impacts/effects of airborne sulfur (SO2) and silica particulates/particles)

The average wind speed in Grass Valley is 5.7 mph. The Brunswick Site is located 2 miles from downtown Grass Valley. As evidenced above, the smaller the particle, the greater the distance travelled. Grass Valley currently monitors PM 2.5 at the Litton Building. Nevada County is currently classified as nonattainment status for PM10.

The International Agency for Research on Cancer of the World Health Organization has classified PM2.5 as a human carcinogen (*IARC: Outdoor Air Pollution a Leading Environmental Cause of Cancer Deaths; Technical Report; International Agency for Research on Cancer (IARC): Lyon, French,27 2013)*

On September 22, 2021 the World Health Organization revised air quality guidelines decreasing criteria air pollutants, especially the recommended exposure levels for PM10 and PM2.5. (https://www.iqair.com/us/blog/air-quality/2021-WHO-air-quality-guidelines

Has a baseline scenario for Grass Valley PM2.5 emissions or PM10 emissions been created since Nevada County is in nonattainment status for PM10? Were background PM2.5 concentrations from long range sources added to the HRA model?

A baseline concentration must be established in order to measure the TRUE impact from the addition of this project to existing air quality and the cumulative impacts on community health.

DPM, silica and asbestos fugitive dust will be emitted under two different categories: criteria air pollutants and as Toxic Air Contaminants. Yet in each situation, their health impacts to the community will be minimized.

Ind 634-39

As a criteria air pollutant, emission levels are not related to the immediate geographical area: "Notably, as detailed in Appendix C, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, such as the disconnect between mass emissions and concentrations due to secondary pollutant (such as O3) generation and pollutant transport, as well as the inaccuracy of applying regional and population-wide models to a local level in order to estimate health effects, and there are currently no modeling tools endorsed by an expert agency (i.e. NSAMQD) that could provide reliable and meaningful additional information regarding health effects from criteria air pollutant generated by individual projects." ***(Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project, pg 46, 2021)***

As a toxic air contaminant, asbestos and respirable crystalline silica will fall under the non-criteria air pollutant category. There are no established limits for monitoring emissions of non-criteria pollutants into the ambient

6

environment. The HRA is based on 30 years of exposure, thus the cumulative effects of the 80-year permit are not addressed.

Ind 634-40

Ind 634-41

HOW WILL THE RELEASE OF THESE TOXIC MICROSCOPIC PARTICULATES TO THE AMBIENT ENVIROMENT BE MONITORED?

SENSITIVE RECEPTORS

Ind 634-42

When listing *Receptors Used for Evaluating Modeled Impacts* are the following statements: "There are existing residences in all directions of the project site, with the nearest located north of East Bennett Road at approximately 100 feet from the project boundary. The nearest hospitals and schools to the project sites are the Sierra Nevada Memorial Hospital on Glasson Way (approximately 1800 feet north of the Centennial Industrial Site) and the Montessori House of Children on The Burma Road (approximately 2,500 feet south of the Brunswick Industrial Site boundary). However, residential receptors are the most conservative to evaluate as discussed further in Section 4.3." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 7, 2021*)

What about the impacts to the following receptors?

The Durham School Bus Depot is located 1.74 Miles west of the Brunswick Industrial Site on Bennett Road. These buses transport our children throughout the county. Will we be delivering asbestos and silica dust along with the children?

Within a 2-mile arc north of the Brunswick Industrial Site are 5 Skilled Nursing Facilities (Golden Empire, Wolf Creek, Atria Memory Care, Spring Hill Manor, and Crystal Ridge), at least 6 Assisted Living Facilities, 10 low-income housing apartment complexes, Hospitality House and Brunswick Commons housing for the homeless. All supportive services are located here as well: Pride Industries, FREED, Alta Regional Center, DaVita Dialysis, Nevada County Public Health offices and Connecting Point. Chapa-De Indian Health and multiple physicians' offices serving Medi-Cal patients are located here too.

Ind 634-43

According to the 2020 US census, 28.6% of Nevada County is 65 years or older as compared to the statewide rate of 14.3% for that population. Under age 65, the disability rate is 14.4% and 32.4% of the population have Medicaid coverage. The mortality rate from Chronic Lung Disease is double the state wide rates (69.26 deaths/100,000 people vs 34.92/100,000). There are also elevated rates for Heart Disease Mortality, Hypertension Mortality, Stroke Mortality and All-Cause Cancer Mortality vs state wide rates.

The demographics of our community must be considered in the context of this project. We already have elevated baselines for high levels of the criteria air pollutants ozone and particulate matter, radon, aging population, chronic disease, and poverty.

WILL THE COUNTY'S EXISTING BASELINES BE TAKEN INTO ACCOUNT?

SOURCE RELEASE SCENARIO

Ind 634-44

Table 2. Emission Source Parameters

DIESEL FUEL

These parameters are used to input data into the AERMOD dispersion model. On Page 10 of the HRA, the generators are listed at a Base Elevation of 2,748.39 m. This calculates to a height of 9017 feet. The Brunswick

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Diesel Storage Tank is listed at a Base Elevation of 2,757.74 m which equals a height of 9048 feet and the Centennial Diesel Storage Tank is listed with a Base Elevation of 2,491.44 m which equals 8174 feet. These measurements are used to estimate carcinogenic volatile organic compound emissions from breathing and working losses from storage tanks which include benzene, hexane, toluene and 2,2,4-trimethylpentane. *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 23, 2021)*

All data entry inputs should be verified in AERMOD model due to these errors, especially units of measure, which may be affected for other source parameters (i.e. plume height/plume width of 25/25 meters for line sources).

Diesel fuel combustion from generator use will exhaust gases and DPM. These estimated emissions have been included for only 100 hours per year during testing/maintenance. Any emissions from actual use have been categorized as speculative. During a Public Safety Power Shutoff (PSPS), it is anticipated that 15,000 gallons of diesel fuel combustion per day will be required to maintain mining operations.

Ind 634-45

Will diesel fuel consumption be monitored? Will there be any provisions to mitigate the impacts from PSPS generator use contributing to increased criteria air pollutants, GHGs and DPM emissions affecting the community and environment?

Will there be any penalties if Tier 4 Final engines are not used exclusively due to "commercially available" status exemptions?

FUGITIVE DUST

SILICA

Silica will be released from on-road vehicles, underground blasting and crushing, ore processing along with earthwork and material handling.

All of the consultants have stated in their reports that they are using information provided by Rise to generate their conclusions. A prime example is the silica emissions. The following table shows the anticipated rock types and amounts expected to be mined:

Ind 634-46

Rock Type	Percent of Total
Meta-Andesite	96%
Altered Meta-Andesite	2%
Diabase	1%
Serpentinite	1%

This chart represents the anticipated barren rock ratios to be mined, approximately 500 tons per day. It does not account for the 1000 tons of mineralized ore rock to be mined each day. (*Groundwater Hydrology and Water Quality Analysis, EMKO, pg 93)*

"The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content."(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 35, 2021)*

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Regarding rock composition, this is meta-andesite rock not just andesite…it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9)*

The laboratory that Rise used for all metals analyses, ACZ Laboratories, is certified to perform both silica and silicon dioxide tests yet not a single sample was analyzed for this parameter. *(ACZ Analytical Capabilities 2017).*

The engineering firm, NV5, stated in the *Centennial Geotechnical Report* (pg 12) that: "We understand that the sand tailings will likely have a gradation similar to the historical gradation presented in the table below, and will typically have a large proportion of quartz."

Mesh Size	Particle Size (mm)	Particle Size (micron)	Percent Passing	Description
48	0.300	300	97.7	Medium Sand
65	0.212	212	87.5	Fine Sand
100	0.150	150	63.9	Fine Sand
200	0.075	75	32.3	Silt
325	0.044	44	12.1	Silt

Quartz is 100% silicon dioxide AND "1000 tons of ore" rock will be processed into tailings each and every day, *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix, B pg 21, 2021*).

These tailings will contain respirable crystalline silica, a toxic air contaminant. Rise has assumed that the ore rock is 98% andesite with a silica content of 60%. There is no data to substantiate this assumption. Minimizing the levels of this TAC to be generated from the excavation of material and milling of quartz greatly diminishes its' impact in the HRA considering the vast amounts, 1500 tons of barren and ore rock, to be mined each day.

HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF SILICA?

ASBESTOS

Asbestos will be released from on-road vehicles, during underground blasting and crushing, ore processing and along with earthwork and material handling.

Ind 634-47

The rock composition chart above lists total serpentinite mined at 1% yet the *Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* assumes *Serpentinite Content of Mine Fill* at 14.3%. Based on the given information, daily mine fill content is composed of 500 tons of tailings and 500 tons of barren rock at 1% serpentinite.

With these ratios, how can engineered fill contain 14.3% serpentinite?

Ind 634-48

Rise has developed an Asbestos, Serpentinite and Ultramafic Rock management plan with the goal of minimizing asbestos release. A 90-day rolling inventory will be maintained in an effort to prevent asbestos contaminated material from being used as aggregate and engineered fill. A three-grab composite sample will be obtained for every 1000 tons mined. The sampling point is located mid drop in the silo. Inventory material will then be screened using Polarized Light Microscopy (PLM), followed by Transmission Electron Microscopy (TEM) testing with results to be mathematically converted to Phase Contrast Microscopy (PCM) equivalent units. These tests are not comparable since they utilize different preparatory methods, sample amounts and microscopy techniques. The detection limit for PLM testing is 0.25% and the detection limit for TEM testing is 0.001%. Conversion of TEM to PCM equivalent units yields a detection limit of 0.01%.

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Under this plan, Rise is using the PCM equivalent units limit of 0.01% to calculate emissions levels for fugitive dust. "A conservative approach for the modelling of TAC emissions is used, with the asbestos content in mined materials assumed at the maximum of 0.01% by mass of PCM equivalent units. The average asbestos content of the mined material is of primary concern since asbestos does not have established acute noncancer effects (OEHHA)"(*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, pg 22, 2021*).

Initial asbestos sampling of 42 samples (*Asbestos Sampling Memo June 2020*) resulted in two samples at 0.075% and 2.5% by PLM analysis along with two samples at 2.0% and 3.1% by TEM analysis. The remaining 38 samples were non-detect (<0.25%) by PLM. Re-testing of these PLM samples by TEM yielded 6 samples with results greater than the PCM equivalent units detection limit of 0.01% in addition to the original 2 TEM samples that were not re-tested. Thus, **twenty percent** of the samples had asbestos levels greater than 0.01% PCM equivalent units.

Excluding the two grab tailings samples from Centennial and the two blanks, the average overall length of a sample core tested for asbestos was 5.34 inches. Samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. Drilling was stopped when asbestos was detected. Drill logs are not available, no information available as to quantity, location, depth, etc. These cores appear to be in close proximity to each other as viewed on geological maps (*Asbestos Sampling Memo June 2020 pp 11-13*).

DEIR pg 3-20: "The ASUR plan incorporates routine asbestos testing by Transmission Electron Microscopy (TEM) and an Asbestos Inventory to ensure that average mined material and engineered fill contains less than 0.01% asbestos by mass of Phase Contrast Microscopy (PCM) equivalent units."

Just because Rise believes that they will be able to control the distribution of material to 0.01% asbestos content does NOT mean that they can control the amount of asbestos in the actual mined material. The content of asbestos in the serpentinite is unknown until tested-this requires blasting, excavation, crushing, skipping, conveyance to the surface, deposition and storage to then be followed by testing. Ventilation from the mine during these underground processes will emit asbestos to the ambient environment. This quantity of asbestos emissions is unknown and CANNOT be assumed to be only 0.01%.

Ind 634-49

The ASUR Plan dictates the use of water curtains and an auxiliary fan system when mining serpentinite material. According to Rise, this system uses MERV 16 filters that will trap particles to 0.03 microns reducing asbestos fibers by 95% before the fibers enter the main ventilation system. How much asbestos will be in the remaining 5% if the initial asbestos content of the rock is unknown along with the unknown quantities of rock mined?

Maintenance of the 0.01% inventory will not be attemptable until AFTER the material is mined, brought to the surface and tested twice- requiring up to two weeks before the results are known.

These asbestos emissions are not accounted for in fugitive dust estimations.

Ind 634-50

In 1986, asbestos was identified by the Board (CARB) as a toxic air contaminant: the Board also determined that there is not enough scientific evidence to identify an asbestos threshold level below which no significant adverse health effects are anticipated (17 CCR 93000). (*Implementation Guidance Document 2017, CARB pg 1*)

The World Health Organization (WHO) concurs that there is no safe level of asbestos exposure. Any asbestos released to the ambient environment will create chronic exposure risk for the community since asbestos does not readily degrade. Protecting mine workers from acute exposure when mining material "rich in asbestos" does not equate to the same level of community protection. Under these circumstances, miners will work a short-shift, wear respirators, be monitored for exposure, and decontaminate themselves before going home. They have the freedom of choice to work in that environment, financial compensation, training in exposure control and health care benefits. The community has none of these protections.

By using the detection level of 0.01% mass by PCM equivalent units to calculate emissions used in the HRA, the levels of this TAC have been grossly underestimated.

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HOW WILL THE COMMUNITY PROTECT ITSELF FROM UNKNOWN QUANTITIES OF ASBESTOS?

HEAVY METALS

"Blasting and crushing would also result in emissions of dust with trace heavy metals TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren rock and mineralized rock was taken from Table 4-7 of the *Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project* (EMKO Environmental, Inc. 2020)"

Heavy metals will be released: from off-road equipment, on-road vehicles, during underground blasting and crushing, ore processing along with earthwork and material handling-all phases of operations.

The data used for heavy metal toxic air contaminants in the Health Risk Assessment are all notated by the laboratory as being received and tested beyond the EPA recommended hold times of 28 days for mercury and 6 months for all remaining metals. Exploratory drilling began in 2017. Since the drill logs are unavailable, the exact sample dates for each core are unknown, but all samples were submitted and received by the gold assay laboratory on February 20, 2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis EMKO, pp 515-516*) and (Appendices: *Groundwater, Hydrology and Water Quality Analysis Report: Inorganic Extended Qualifier Reports pp. 389-407 and 458-484)*

Ind 634-51

After assays were performed, samples were then submitted to ACZ Laboratories for metal analyses. It is not clear where the samples were located between the assay lab, ALS Laboratories in Reno, Nevada and submission to ACZ Laboratories in Steamboat Springs, Colorado. The Chain of Custodies describe these 47 samples as Tailings (assay pulp). All list a sample date of 3/5/19:12:00 pm. Under the Sampler's Name were the initials, BM (Ben Mosssman?) Ben Mossman and Andrew Kopania of EMKO both received copies of the laboratory reports as listed on the CoCs. The laboratory received by date for all samples is 11.11.2019. Twenty samples were digested on 11.22.2019 and the remaining twenty-seven samples were digested on 11.26.2019. (The digestion dates would be used for endpoint hold time calculations).

These samples may have been collected at that time but they were NOT sampled at that time. These metals analyses were performed in November 2019 in two batches. This means that all samples were tested at least 9 months beyond their hold time expiration date, probably more.

Potentially toxic elements (PTEs) hosted in asbestos elongate mineral particles is one of the factors that determines their toxic/pathogenic effects. Metals such as Fe, Mn, Cr, and Be are known to induce toxicity and contribute to asbestos related diseases. "...it is essential to quantify the toxic elements present in asbestos elongate mineral particles in order to prevent asbestos-related diseases." (https://doi.org/10.1016/j.chemgeo.2020.119896Get rights and content)

SHOULDN'T VALID DATA BE USED WHEN EVAUATING THE HEALTH RISKS TO THE COMMUNITY FROM THESE TOXIC AIR CONTAMINANTS, ESPECAILLY WHEN THESE METALS HAVE THE ABILITY TO POTENTIATE THE EFFECTS OF ASBESTOS?

CONCLUSION

Ind 634-52

"Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for the purposes of this HRA." (*Air Quality and Greenhouse Gas Emissions Analysis Report for the Idaho-Maryland Mine Project: Health Risk Assessment, Appendix B, Pg 22)*

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Estimations of estimates...estimates of estimations

IS THERE ANY VALIDITY IN ANY OF THESE ASSUMPTIONS, ESTIMATIONS OR DATA REGARDING THE EMISSIONS OF SILICA, ASBESTOS, HEAVY METALS OR DPM?

IS THERE ANY VALIDITY TO THIS HEALTH RISK ASSESSMENT OF OUR COMMUNITY?

Thank you,

Pam Heard RRT

Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

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Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR. as an Addendum to my Health Risk Assessment Critique.

Health Risk Assessment Critique Addendum

ANFO EXPLOSIVES

Other emissions of TACs from blasting pertain to the detonation of ANFO, which were estimated based on emission factors from *AB 2588 Combustion Emission Factors* (Ventura County Air Pollution Control District 2001). (*Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Pg 36)*

Ind 634-53

These TACs are listed found in Underground Blasting and Crushing in Table 10. Project Annual On-Site Operational TAC Emissions *(Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Appendix B, Health Risk Assessment, pg 386)*

Explosive use is estimated at 0.93 tons per day. ANFO contains ~6 % diesel fuel #2. Rise also plans to use emulsion-based explosives and the emissions for emulsion-based explosives are currently unknown.

The diesel fuel in ANFO will release TACs upon combustion and include: acetaldehyde, acrolein, benzene, 1,3 butadiene, formaldehyde, naphthalene, polycyclic aromatic hydrocarbons (PAHs) and toluene, etc.

However, in Table 10, these compounds are only estimated for Underground Blasting and not for the diesel fuel used in Off-Road Equipment, On-Road Vehicles, and Diesel Generators. Only DPM emissions have been included for Off-Road Equipment, On-Road Vehicles and Diesel Generators.

HAVE ALL OF THE TACs FROM DIESEL FUEL COMBUSTION BEEN INCLUDED BEYOND JUST THE DPM EMISSIONS?

HEXAVALENT CHROMIUM

Ind 634-54

EXPLOSIVES

Hexavalent chromium is also found in the detonation of explosives. It is released from the combustion of diesel fuel and is also often used as a catalyst in ANFO composition. An estimate for the hexavalent chromium from underground blasting was included in Table 10. Project Annual On-Site Operational TAC Emissions *(Air Quality and Greenhouse Gas Emissions for the Idaho-Maryland Mine Project, 2021 Appendix B, Health Risk Assessment)*

PORTLAND CEMENT (This topic is more germane to groundwater contamination but there will be some airborne exposures from delivery, mixing, etc.)

Hexavalent chromium is toxic air contaminant found in Portland cement in varying ratios. The Cemented Paste Backfill study investigated the paste process with the conclusions that more work must be done regarding:

- Identify a cement supplier to provide cement with low hexavalent chromium content
- Perform leachate analysis to ensure minimal leaching of hexavalent chromium in CPB
- Experiment with CPB rheology to determine proper ratios of cement, fill, etc.

Regarding hexavalent chromium content of cement: "Itasca (2020a) recommends that additional testing and engineering be conducted prior to implementation to select the proper source for the Portland Cement Binding agent to minimize the presence of Cr^{+6} in the mixture, and identify the minimum time that should be allowed for the mixture to cure before allowing it to become inundated in the mine workings."*(Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project EMKO pg 103)*

Ind 634-55

"Prior to use of CPB, additional documentation would be needed to verify that Cr^{+6} levels in the Portland cement used for the mixture are minimal and will not leach." "The Conditional Use Permit, either as a mitigation measure or as a condition of approval, should require that the source of the Portland cement to be used for the CPB be specified and that testing data showing the Cr^{+6} levels do not leach above the water quality standards must be provided to the County prior to the use of CPB. In addition, the County should require that a RoQWD for use of CPB be submitted to RWQCB at least six months prior to the proposed initial use of CPB and that the WDR be received prior to initiating any mine backfilling using CPB." *(Groundwater Hydrology and Water Analysis for the Idaho-Maryland Mine Project EMKO pg 115)*

"The presence of chromium in cement has been identified as a potential water-quality concern related to the use of CPB. Hexavalent chromium (Cr[VI]) is an oxidized form of chromium that is more soluble and mobile in the environment than reduced forms of chromium. Notably, less Cr (VI) leaches from cured cement than from unhydrated cement; Estokova et al. (2018) demonstrated that less than 0.5 of total chromium leached from a range of cured cement composites compared to 0.8% to 1.8% of total chromium from the Portland cement binder itself. Thus, selecting a supplier with low Cr (VI) content cement and ensuring the CPB is not inundated before it sets can minimize the potential for issues with Cr (VI) leaching."(*Cemented Paste Backfill Study, pg 3*)

"Itasca understands that Rise plans to complete more extensive strength, rheological, and geochemical testing on their ultimate CPB mixture at a later stage in the IMM project."(*Cemented Paste Backfill Study pg 6)*

There is no evidence that any of this work has been completed.

Ind 634-56

What type of ventilation will be used in the cement processing plant?

Ind 634-57

HOW CAN YOU ESTIMATE THE AMOUNT OF HEXAVALENT CHROMIUM WHEN YOU DO NOT KNOW THE AMOUNT OF CEMENT TO BE USED, DO NOT HAVE A SUPPLIER OR KNOW THE COMPOSITION OF THE CEMENT REGARDING HEXAVALENT CHROMIUM AND SILICA CONTENT?

RADON

Ind 634-58

Radon is a toxic air contaminant that needs more consideration regarding community impacts. There are only two mentions of radon throughout all the consultants' reports. In the NV5 reports are the disclaimer sentences: "Our scope of services did not include a groundwater flow analysis nor an evaluation of the Site for the presence of hazardous materials, mold or radon gas." *(Geotechnical Engineering Report Idaho-Maryland Mine Project-Centennial Industrial Site, pg 2)* and "Our scope of services did not include a groundwater flow analysis nor an

evaluation of the Site for the presence of hazardous materials, historic mining features, asbestiform materials, mold or radon gas." *(Geotechnical Engineering Report Idaho-Maryland Mine Project-Brunswick Industrial Site, pg 2)*

- According to the world Health Organization (WHO), "Radon is a radioactive gas that emanates from rocks and soil and tends to concentrate in enclosed spaces like underground mines and homes".
- It is generated from the decay of radium. Radium is a decay product of uranium and thorium which are naturally occurring in rocks and soils.
- Because it is a gas, it moves freely in the air spaces between rocks and in soils.
- Factors that can affect radon levels include local geology, construction materials and how the home was built.
- Levels can vary from home to home, it's very unpredictable.
- You cannot see it, smell it or taste it
- After smoking, radon is the second leading cause of lung cancer in the United States
- For non-smokers, Radon is the leading cause of lung cancer
- US EPA estimates that radon causes about 21,000 lung cancer deaths each year.
- There is a linear relationship between radon and lung cancer: As radon levels increase, the risk of lung cancer increases

RADON LEVEL AVERAGES: US vs STATE vs COUNTY

- The national average of radon is 1.3 pCi/L
- California average is 0.85 pCi/L
- Nevada County average is 3.1 pCi/L

The EPA action level is 4.0 pCi/L. Twenty six percent of home in Nevada County have radon levels greater than 4 pCi/L (county-radon.info/CA/Nevada.html)

According to the California Department of Health, in Grass Valley,

- Testing of 315 homes in 95945 resulted in 66 tests (21%) of homes ≥ 4.0 pCi/L with a maximum result of 29.5 pCi/L.
- Testing of 232 homes in 95949 resulted in 22 tests (9.5%) of homes ≥ 4.0 pCi/L with a maximum result of 14.3 pCi/L
- Testing of 340 homes in 95959 resulted in 59 tests (17.4%) of homes ≥ 4.0 pCi/L with a maximum result of 28.6 pCi/L

The Brunswick Site is located in the zip code 95945.

Since radon seeps into your home from several sources: fractured bedrock, groundwater, soil and well water…

WILL THE REOPENING OF THE IMM AFFECT RADON LEVELS IN GRASS VALLEY?

Rise did test groundwater from some drains and the New Brunswick shaft for radionuclides: uranium, Ra226, Ra228, and gross alpha emitting particles. Ra226 and Ra228 are precursors for radon. The maximum contaminant level for both combined is 5 pCi/L (3 for 226 and 2 for 228). The detection level is 1 pCi/L. All test results were below the maximum contaminant level.

However, in 2006, the state of California adopted new Public Health Goals for Ra226 and Ra228. The new goal for Ra226 is 0.05 pCi/L and the new goal for Ra228 is 0.019 pCi/L. The combined values at 0.069 are below the current detection level of 1 pCi/L but these new goals demonstrate that the state recognizes the health risk for lung cancer from radionuclides exposure. Now looking at the groundwater test results under these criteria, all Ra226 and Ra228 results meet or exceed these PHGs.

Over the last decade, several studies have concluded that elevated radon concentrations could be a sign of an imminent earthquake. Radon is released from cavities and cracks in the rocks and soil due to "a slight compression of pore volume that causes gas to flow out of the soil".

1900 pounds of explosives will be detonated every day!

WILL THE CONTINUOUS EXPLOSIVES USE AND TUNNEL EXCAVATIONS LEAD TO INCREASED ROCK FRACTURES AND FISSURES THEREBY INCREASING RADON LEVELS IN OUR COMMUNITY?

HOW WILL THE COUNTY MONITOR RADON LEVELS AT THE MINE AND THROUGHOUT THE COMMUNITY?

Thank you,

Pam Heard RRT

Pam Heard RRT

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Mar 25, 2022

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Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

MISCELLANEOUS PURSUITS

DEIR pg 2-74 section 4.6-7 "potential for geologic related impacts and hazards"

Ind 634-59 Inclusion of hexavalent chromium (from unknown quantities in cement) and radon as TACs (toxic air contaminants). Emissions have not been calculated or included in the Air Quality Report, particularly in the Health Risk Assessment.

Ind 634-60 What is the potential of unknown quantities of cement utilized in the CPB placed in the mine stopes to leach hexavalent chromium into groundwater or surface water supplies? Especially after reflooding occurs after reclamation?

Ind 634-61 ANFO is classified as a TAC and is hazardous to aquatic life. Since water will be used to control fugitive dust released from explosions, how will this water be recovered and treated? Is there potential for any of this contaminated water to enter the groundwater or surface water systems? Will impacts increase when flooding occurs after reclamation?

Ind 634-62 Asbestos is classified as a TAC. Asbestos will be found in water used for fugitive dust control, water curtains, equipment decontamination (ASUR Plan), shower and laundry effluents (pg 2-73). How will this water be recovered and treated? Is there potential for any of this contaminated water to enter the groundwater or surface water systems?

Ind 634-63 **DEIR pg 3-40**: "Underground mining service water: Such uses include water use for dust suppression in rock drills and blasted rock piles, which is piped into the mine workings. Net consumption of water would not result from such activities, because water in underground workings is pumped to the surface for reuse."

Is there potential for these contaminants to enter the groundwater or surface water systems, if not immediately then when mine is flooded during reclamation?

1

Ind 634-64

DEIR pg 2-18 Table 2.1 item (b)

What dust suppressants and chemical stabilizers will be used, and in what quantities?

Investigate dust suppressants and chemical stabilizers for their impacts on vegetation (premature death) resulting in:
- -Lack of forage for wildlife, impact on wildlife from decreased food supplies
- -Increased flammability

Investigate impact on wildlife from ingestion of:
- -Contaminated forage
- -Contaminated groundwater/surface water

Investigate dust suppressants and chemical stabilizers for their impacts on aquatic systems
Investigate dust suppressants and chemical stabilizers for their impacts on soil ecology

Ind 634-65

DEIR pg 3-40: "Lighting during nighttime hauling and dumping of engineered fill would be limited to haul truck headlights."

How can dust suppression be monitored in the dark?

Ind 634-66

DEIR pg 2-19 (d) and (e)
Installation of wind barriers:
What are the aesthetic impacts from wind barriers: height, width, color, location?
What are the impacts on noise pollution?
What is impact on wildlife, especially birds?
What is impact on pollutant stream direction?

Ind 634-67

Application Documents-Project Information Questionnaire-Revision 1
Security Fencing will be used to restrict access to portions of the Brunswick site. Fencing will be metal chain link and range in height in accordance with Nevada County Code Sec. L-II 4.2.6

No mention of fencing or signage required around capped toxic soil (5.6 acres) on Centennial site as mentioned in RAP.

What impacts will these fences have on aesthetics and wildlife?

Ind 634-68

Initial Applications Documents-Brunswick Industrial Site-Hazardous Materials Inventory Statement

Investigate flotation compounds. The Air Quality Report Nov 2021 (pg 297, Idaho-Maryland Mine Project Reagent Use lists the following:
Promoter 100 pounds per day Aerophine 3418A Note: no information is available online (only by direct request from manufacturer) but it is a phosphine-based collector
Promoter 50 pounds per day Aerofloat 208
Frother 80 pounds per day Aerofroth 70 - MIBC
Flocculant 80 pounds per day Magnafloc 10
Descaling 264 gallons per month Scaletrol PDC9401

2

However, Applications Documents: Brunswick Industrial Site-Hazardous Materials Inventory Statement lists the following:
Promoter-Aero 407
Frother Aerofroth 70
Flocculant Magnafloc 10
Descaling Scaletrol PDC9333
Collector Aero Maxgold 900

These are two very different lists. What reagents in what quantities will actually be used? This information is necessary for safety (i.e. hazard class designation) as well as potential environmental impacts.

Ind 634-69

The collector and promoter, AERO MAXGOLD 900 and AERO 407 respectively, are especially toxic to aquatic life with long lasting effects. What quantities will be used and what residual amounts will contaminant the tailings used for engineered fill? Calculate amounts that will leach from tailings platforms into storm drainage system with exits to waterways. This situation will occur at both the Centennial and Brunswick sites and wherever engineered fill utilizing sand tailings is transported.

Ind 634-70

DEIR pg 4.7-29 states that these chemicals will be removed using filter presses during water removal. How is this verified? Will the tailings be tested for residual reagents contamination?

What will be the cumulative effects on terrestrial and aquatic environments from these agents? Are these compounds monitored by waterboard as a condition of discharge?

Notably, the effects of the promoters have been left out of the descriptions under *Use and Storage of Various Chemicals* DEIR pg 4-7.28 & 29 while the effects of the less toxic chemicals (flocculant, frother) are included.

(CuSO4.5H2O, PAX potassium amyl xanthate, AERO 208, Aerofroth 65 and Soda Ash were used in flotation study by McClelland Laboratories, pg 556 Appendices)

Ind 634-71

DEIR pg 2-78 Section 4.7-4 "Impair implementation of or physically interfere with adopted emergency response plan or emergency evacuation plan"

Investigate flammability of all Hazardous Materials Inventory. Verify accuracy of listed materials.

Ind 634-72

Review evacuation routes and perform mock scenarios for community preparedness. Study interagencies dependence/access to Air Park.

Ind 634-73

Grass Valley Air Attack Base and Grass Valley Emergency Command Center are both located at the Nevada County Air Park (DEIR pg 4.13-8). These critical facilities are located in a Very High Fire Hazard Severity Zone.

Ind 634-74

In August 2021, the Bennett Fire burned approximately 59 acres, comprising most of the Centennial Industrial Site. (DEIR pg 4-13.3) Sierra Nevada Memorial Hospital and Skilled Nursing Facilities were told to "shelter in place" as others in the surrounding area were evacuated. The majority of these "others" consisted of seniors in low-income apartment complexes just north of Centennial site.

3

DEIR pg 4-7.10: "Shelter-In-Place - Advises people to stay secure at their current location by remaining in place as evacuation will cause a higher potential for loss of life."

DEIR pg 4-13.13

Ind 634-75

Does the new proposed Nevada County Emergency Operations Plan-Mass Evacuation Annex include incidents of fire caused by accidents related to Rise operations to include potential transportation (off-site), explosives use (off-site), storage of flammable hazardous materials (on-site), etc.?

DEIR pg 4-13.15 "Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire."

DEIR pg 4-13.3 "Prevailing Winds: The predominant wind direction at the project site area is from the North-East and South-West directions. This suggests, for example, that a fire burning in the forested terrain southwest of the Centennial and Brunswick Industrial Sites could burn through the Sites due to prevailing southwesterly winds."

Ind 634-76

Challenge with WeatherSpark data model weighted 67% from Nevada County Air Park showing wind is from the south 7.4 months of the year and from the East 4.6 months of the year. The Nevada County Air Park is 4000 ft from the Brunswick Site. These wind directions confirm that a fire burning from the southwest forested terrain would not only burn through the sites but through the entire town of Grass Valley.

And an isolated fire burning on the Brunswick site has the potential to ignite numerous flammable materials releasing hazardous pollutants which would then be transported by prevailing winds into Grass Valley and environs. This fire would then have the potential to ignite a wildfire too.

DEIR pg 4-13.26: "In addition, although runoff from both Sites flows into creeks, the project includes drainage facilities to capture runoff prior to entering the creeks. Should a fire occur on one or both of the Sites, the proposed drainage facilities would capture and slow postfire runoff, thus minimizing flooding potential downstream."

Ind 634-77

What about the runoff of pollutants entering the creeks postfire?

DEIR pg 4-13.11 "Policy FP 10.7.3: Projects requiring a traffic study shall include in such study an assessment of the current emergency evacuation capacity of the public and/or private roads that serve the proposed project, and recommended mitigation that will increase the evacuation capacity, if needed."

DEIR pg 4-13.17 "Operation of the approximately 7.4 haul trucks per hour attributable to the proposed project could either be temporarily ceased and/or these trucks could pull off the road to enable residents to evacuate as quickly and expeditiously as possible."

Ind 634-78

There is no room for any truck or car to pull off the road. Brunswick Road is a narrow two-lane road with limited shoulder widths (if available at all) and embankments on both sides. In the event of an evacuation, both lanes should be one-directional. With trucks travelling on both lanes, evacuation will

be unable to occur in either direction. Also, truck deliveries that occur via SR49 through narrow congested intersections leading to the primary evacuation route may be compromised.

Ind 634-79

How can Brunswick Road be considered a minor arterial road when 118 haul truck round trips per day are warranted for Rise operations? DEIR pg 4-7.38 This does not include the additional (up to) 18 semi-truck deliveries per day. DEIR pg 4-7.37

Yet, Brunswick Road has been defined as a minor arterial road, a secondary evacuation route only used by residents for evacuation. DEIR pg 4-7.37

Ind 634-80

DEIR pg 4-7.39: "While the proposed project would involve haul of hazardous materials to and from the Brunswick Industrial Site via Brunswick Road, no other cumulative projects are anticipated to similarly haul hazardous materials along Brunswick Road on an ongoing basis."

What about the Loma Rica Business Park on Loma Rica Drive? There is only one-way ingress/egress via Brunswick Road. This business park contains all of the county propane suppliers, Apria Healthcare (delivers oxygen to county residents) and multiple auto businesses using welding gases. (Hazmat Class 2) The signal at Brunswick Road and Loma Rica Drive intersection currently has a right turn on red for traffic entering Brunswick Road northbound onto Brunswick Road. There is a steep decline in elevation from this point. How will a haul truck or semi-trailer decelerate to prevent collisions with a vehicle turning right on red from this intersection?

Ind 634-81

DEIR pg 4.12-21: "Goal MV-4.1 Provide for the safe and efficient movement of people and goods in a manner that respects the rural character of Nevada County."

How will this goal be achieved on Brunswick Road given increased amounts of truck traffic?

DEIR pg 4-13.24 and pg 3-39: "The project would install two, 12,000-gallon above-ground diesel fuel storage tanks on the Brunswick Industrial Site.

Ind 634-82

This is the first mention of two diesel fuel storage tanks. All other consultant documents refer to one 30,000 gallon storage tank at the Brunswick site.

DEIR pg 2-85

Rise will pay for monthly fixed service charges of use of up to 400 gallons per day. What about drought surcharges? What about drought limitations on volumes in the future?

Ind 634-83

...Until sold or annexed into city of Grass Valley. Why should the homeowner with a pre-existing well that was destroyed by Rise now have to pay for water just because of annexation? They would have had a well water supply regardless of annexation status. If these rights don't transfer with a sale, then the homeowner should be paid for loss of the well. The existing well is a component of the property value. NID connection is part of the property value as well, however the water from the well itself has been excluded in this valuation.



Ind 634-84

DEIR pg 3-21 & 22 There is much discussion regarding the ventilation system including a Main ventilation fan and secondary fans-no mention of any type of filtration.

"Once the service raise is completed and the permanent ventilation system is constructed, the primary ventilation fans would be located underground and the temporary ventilation fan on the surface at the Brunswick shaft would be removed."

This sentence mention primary ventilation fans, plural. The Air Quality and Greenhouse Gas Report lists the quantity of main ventilation fans as 3 on page 27. Booster and auxiliary fans are mentioned on page 26 in addition to the 3 main ventilation fans.

How many main/primary fans are there?

The number of fans is critical since the fan(s) is (are) emission source(s) in the Health Risk Assessment. (Pg 8, HRA, Appendix B, AQ Report 2021)

Ind 634-85

DEIR pg 3-28: "During normal operations, an average of one 7,500-gallon fuel tanker would travel to/from the sites every two weeks, using Brunswick Road to SR 20/49, over the 80-year term of the use permit. During any public safety power shutoffs (PSPS) events, a maximum of two fuel tankers per day would be required due to additional fuel demands associated with backup generators."

While predicting a PSPS event may be speculative, the emissions from the combustion of 15,000 gallons of diesel fuel per day is not speculative. These generators release emissions at 855°F to the ambient environment. There must be some accountability for the additional GHGs and carcinogenic DPM released from these emissions.

What will be the consequences of excess diesel fuel usage not accounted for in estimated emissions?

Ind 634-86

DEIR pg 3-28 What is a sufficient insurance policy regarding explosives transport?

For the first 6 months of construction, explosives will be delivered multiple time per week DEIR pg 4-7.26

Ind 634-87

DEIR pg 2-96 How long will the mine be blasting above the 1000 ft level?

Ind 634-88

DEIR pg 4.7-2: "Recognized Environmental Conditions (RECs) associated with the project sites. A REC indicates the presence or likely presence of any hazardous substances in, on, or at a property due to any release into the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment."
"Similar to the cleanup of Areas B and C, the USTs would likely be considered HRECs provided that regulatory closure records are found."

Records have not been found for closure of Area B (drum spill) or Area C (disposal site) along with a 1000 gallon gasoline tank installed in 1977, a 12,000 diesel fuel tank installed in1977 and a 1000 gallon tank with unknown installation date. DEIR pg 4.7-7 & 8

Ind 634-89

DEIR pg 4-7.18: "The hazardous materials business plan program requires businesses in Nevada County to prepare plans detailing facility information, a hazardous materials inventory, and an emergency response plan if hazardous materials storage equals or exceeds minimum reportable quantities, which are: 55 gallons of a hazardous liquid; 500 pounds of a hazardous solid; or 200 cubic feet of a compressed gas. The NCEHD provides access to the information in the hazardous materials business plans to emergency response agencies, including fire and police."

Has this plan been submitted?

Ind 634-90

DEIR pg 4.12-23: "The LTMF is based on total thousand square feet of buildings. The project proposes 126,000 square feet of industrial buildings and will be required to pay the LTMF. The current fee would be calculated as 126 TSF x $442.44 = $55,747.44. The actual fee paid will depend on the mitigation fee in place at the time of construction.

How is the Mitigation fee calculated? What actual amount will be paid?
DEIR pg 4.12-24: "The GVTIF is based on total thousand square feet of industrial buildings. The project proposes 126,000 square feet of industrial buildings and will be required to pay the required GVTIF. The current fee would be calculated as 126 TSF x $666.66 = $83,999, and an administration fee of 1% = $839.99. The actual fee paid will depend on the mitigation fee in place at the time of construction.

Why is the City of Grass Valley entitled to more revenue when the most impacted road, Brunswick Road, is located in the County?

DEIR pg 4.12-25: "The project proposes 126,000 square feet of industrial buildings and will be required to pay the required RTMF. The current fee would be calculated as 126 TSF x 5.33 x $79.37 = $53,303.30. The actual fee paid will depend on the mitigation fee in place at the time of construction.

Who receives this money? Are these funds sufficient?

Thank you,

Pam Heard RRT

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Mar 25, 2022

To: Matt Kelley, Senior Planner

Nevada County Planning Department
950 Maidu Ave, Suite 170
Nevada City, CA
530-265-1423
Matt.Kelley@co.nevada.ca.us
Idaho.MMEIR@co.nevada.ca.us

Attn: Matt Kelley,

Please include these comments to the Idaho-Maryland Mine DEIR.

SAMPLING PROCEDURES

Ind 634-91

Page 93 of the *Groundwater Hydrology and Water Quality Analysis Report*, EMKO states that Rise completed 19 drill core holes, totaling 67,500 linear feet, from 2017-2019. The sampling pattern was to drill 90 feet, pull a 10-foot sample segment, drill another 90 feet, etc. The drill logs are not available for review; the actual dates, precise locations, drift angles, widths, final depths, etc. are unknown.

"The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93) Samples were received on 02.20.2019 with a finalized date of 03.05.2019. (*Appendices: Groundwater Hydrology and Water Quality Analysis Report pp 515-516*)

After assay for gold, the samples were subjected to additional testing at different laboratories.

Ind 634-92

METALS ANALYSES, DI-WET, ABA, WET CHEMISTRY PARAMETERS

FLOTATION COMPOSITE- McClelland Labs

"A composite sample was prepared from 76 samples of the ~2 mm material remaining from assaying. A portion of the material was weighted to represent the interval length and merged to make the metallurgical sample. Sufficient material was available for most samples, except for five samples where no material was available from the assay lab. The 76 samples created a composite metallurgical sample of approximately 46 kilograms (kg) (100 pounds)". (*Groundwater Hydrology and Water Quality Analysis Report pp 95-96*). This composite was sent to McClelland Labs in July 2019 which then homogenized the sample and split it into 4 sub-samples, F1-F4 flotation tailings samples. Page 537 of *Appendices: Groundwater Hydrology and Water Quality Analysis Report* states: "A total of 7 buckets containing 6 separate samples were received from the Maryland mine on July 10, 2019. The

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samples weighed 4 to 47 kg, and appeared to be approximately -6 mm in size. The largest sample ("flotation composite") was intended for analysis..."

Is the material 2 mm or 6 mm in size? What is the exact provenance of the 76 samples that comprise the composite as it relates to the 47 cores submitted for assay?

After flotation testing, these samples were shipped from McClelland Labs to a geologist at Benchmark Resources in Folsom, CA during November 2019 who then submitted the samples to ACZ Laboratories in Steamboat CO. These samples, F1-F4, were then analyzed by ACZ for total metals, DI-Wet metals, Static Acid-Based Accounting and wet chemistry parameters.

BARREN ROCK-ACZ Laboratories

Ind 634-93

On October 29, 2019 a geologist with Benchmark Resources selected barren rock samples: MA-1, MS-1, MA-2, MAA-1, S-1 and MA-3 from Rise Grass Valley. These samples were from 3 different cores [1 sample from I-18-10, 1 sample from I-18-11 and 4 samples from I-19-13 (*Groundwater Hydrology and Water Quality Analysis Report, EMKO pg 93)*], with combined segments equaling 34.1 linear feet. This represents only 0.05% of 67,500 total linear feet.

They were submitted to ACZ Laboratories in November 2019 to be tested for total metals, DI-WET metals, Static ABA and wet chemistry parameters.

METALS ANALYSES-BARREN ROCK CRUSHED CORES-ACZ Laboratories

Samples submitted for metals testing with identifiers can be found in Table 4-9 Barren Rock Crushed Core Samples: Total Metals Results in *Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102*.

Ind 634-94

Regarding the barren rock crushed core metals analyses, only 5 cores were tested which means that only 26% of the 19 total cores were sampled [1 sample from B-18-02, 3 samples from I-18-10, 1 sample from I-18-11, 2 samples from I-18-12 and 40 samples from I-19-13 (*Groundwater Hydrology and Water Quality Analysis Report, EMKO pp 101-102*)]. All five core segments combined length equal a total of 456.5 linear ft. These combined 10 ft segments represent only 0.68% submitted for testing compared to total of 67,500 ft. In general, each sample represents 10 linear feet. The diameter of the cores is not given. It is not stated how much material, weight wise or volume, is contained in each segment or specifically how that material is "homogenized" to obtain a representative sample for testing.

After assay at ALS Laboratories, the samples were labelled as "Pulp-2, Tailings= (assay pulp)". These 47 samples were then analyzed by ACZ Laboratories for total metals. The final weight used in metals analysis is 1-2 grams of material per sample.

Ind 634-95

The reference for this "Crush and Pulverize" step is EPA 600/2-78-054 3.1.3 (Field and Laboratory Methods Applicable to Overburdens and Minesoils, March 1978 pp. 43-45). The Foreword states "This report provides chemical, physical, mineralogical, and microbiological procedures for the analysis of coal overburdens and the resultant minesoils. These step-by-step methods identify and measure rock and soil properties that influence advance planning, mining efficiency, post-mining land and water quality and long-range land use."

Procedure (3.1.3):

1. Pour field sample onto a large square of brown paper. Spread material evenly and allow to air dry. NOTE: Sample may have to be mixed periodically to speed drying.
2. After drying, the field sample is split into two representative subsamples. One subsample is placed in a container, labeled, and stored for physical analyses or individual preference tests.
3. The other subsample is placed between two sheets of brown paper and crushed by moderately rolling over the top sheet with a rolling pin. This process is continued until the entire field sample has been processed. NOTE: Do not allow paper fragments to become incorporated with the soil sample. Do not crush rock fragments.
4. Pass the crushed material through a sieve with 19 mm openings and discard material retained on the sieve.
5. All material passing the 19 mm sieve is crushed to pass through a sieve with 6.35 mm openings.
6. Place sieved sample in a 1 liter container and cover. NOTE: Container should not be more than two-thirds full or mixing (step 7) will be impaired.
7. Tumble container end-over-end until material is thoroughly mixed.
8. Place three heaping teaspoons of the mixed material in the pulverizer. Material is pulverized until it passes a 0.25 mm (60 mesh) sieve. NOTE: A cast iron mortar and pestle can be substituted for the pulverizer.
9. Place pulverized material in a plastic vial for laboratory use.
10. Label vial with the sample identification shown on the field container.
11. Mix sample thoroughly by tumbling the vial end-over-end before subsampling for laboratory procedures (primarily chemical analyses).

After a sample is obtained, according to test method, M3050B (SW-846) Acid Digestion of Sediments, Sludges and Soils, a 1 gram (dry weight) of sample is digested for ICP-MS metals analyses testing. The digestate is then diluted to a final 100 ml volume. Flow injection volumes generally range from 20µl-200µl (microlilter) from the 100 ml prepared volume. A µl (microliter) is equal to 0.001 milliliter(ml) or 1/1000th of ml. Analyses dilution factors range from 1 to 500. For reference: There are 1 million grams in a metric tonne.

All metals were digested using EPA Method 3050B. The results should be defined as the "Total acid soluble/recoverable metals" fraction since this method does not use hydrofluoric acid, thus it is unable to break down silicates. (EPA SW-846 Revision VI December 2018, Chapter 3, pg 4)

ACZ Laboratories did receive "pulp" samples, residual material after ALS gold assay analyses. "In addition to the barren rock samples, Rise provided 48 crushed core samples, taken from ~2 mm assay rejects, for trace element test work." (*Groundwater Hydrology and Water Quality Analysis Report, EMKO, pg 95*) The actual number of samples was 47.

The barren rock samples must be pulverized prior to acid digestion just as the 47 "pulp" samples were pulverized prior to analysis for metal analyses. Any conclusions comparing metals content, leachate capacity, ABA, etc. between pulp results and barren rock results is moot since the sample preparation (pulverization) is identical.

Ind 634-96

TESTING TIMELINES

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After exploratory drilling, cores were sent to ALS Laboratories which were received on 02.20.2019. Date finalized 03.05.2019. "The cores were sawed in half in zones of interest and sent to ALS in Reno, Nevada to be assayed. ALS Laboratories crushed and homogenized the sample to ~2 mm size, split a 1 kg sample, pulverized the split sample, and assayed a split of the pulverized sample." (*Groundwater Hydrology and Water Quality Analysis Report* pg 93)

Then the composite sample was prepared and sent to McClelland Labs for flotation testing from July 2019- November 2019. Samples F1-F4 were then sent to ACZ Laboratories for metals testing, DI Wet testing, ABA and wet chemistry parameters. The Flotation Results Report from McClelland Labs was not submitted to Rise until January 29, 2020.

Also in November, 2019, the 47 crushed core samples were sent to ACZ for metals testing along with the six barren rock samples to be tested for metals, DI WET metals, ABA and wet chemistry parameters.

It is difficult to understand how the composite sample was prepared and analyzed months before the individual samples (barren rock and barren rock crushed core) were submitted to ACZ in November 2019. The chains of custodies do not reflect the written account. Other than the out-going COC from McClelland to Benchmark Resources regarding F1-F4 samples, all sample shipments originate from Rise Grass Valley. The transitions between the various laboratories are not documented regarding dates, amounts, sample containers, etc.

SAMPLE POPULATIONS

FLOTATION COMPOSITE

"A total of seven buckets containing six separate samples were received from the Maryland Mine on July 10th, 2019. The samples weighed 4 to 47 kg, and appeared to be approximately 6 mm in size. The largest (flotation composite") was intended for analysis and metallurgical testing as well as environmental characterization of the testing products... The five remaining samples were indicated to be waste rock samples of various types for environmental characterization. Preparation and analysis of the waste rock samples will be discussed in a separate report." (*Appendices*: *Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 2)*

Ind 634-97

"The rougher tailings from two selected tests were also subjected to environmental characterization (discussed in a separate report)." (*Appendices*: *Groundwater Hydrology and Water Quality Analysis Report: Appendix H, pg 4)*

The flotation composite arriving in a bucket is not a very specific provenance considering that these tailings will be used to determine heavy metal leachates. What material was in this bucket?

What is environmental characterization of the testing products? What is the environmental characterization of the waste rocks? Where is the separate report that describes the preparation and analysis of the waste rock and rougher tailings for "environmental characterization"? Is the environmental characterization part of the Cement Paste Backfill study?

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BARREN ROCK SAMPLES

The three cores represent a 15.8% sample population when compared to 19 total cores. Samples MA-1(I-19-13), MS-1(I-19-13), MA-2 (I-19-13), MAA-1(I-19-13), S-1(I-18-11) and MA-3 (I-18-10) were each tested for barren rock total metals, barren rock leachate DI-WET, barren rock Static Acid-Based Accounting, and Wet Chemistry parameters. In addition, samples MA-1, MS-1 and MA-1 were assayed for gold determination.

BARREN ROCK CRUSHED CORE SAMPLES

Metals analyses for forty out of forty-seven representing 85% of the total rock core samples were from a single drill core, I-19-13, at various depths (167 ft bgs to 4774.6 ft bgs = 4607.6 total feet). These samples represent 6.8% sample population when compared to 67500 total linear feet. In addition, 25% of this core is missing between depths 3227.0-3583.0 = 356 ft, 3969.7-4313 = 343.3 ft and 4323.0-4767.9 = 444.9 ft. These missing sections total 1144.2 ft out of 4607.6 feet. The remaining 3463.4 feet represent a 5.1% sample population compared to the 67500 total linear feet.

CONCLUSION

Ind 634-98 It is obvious that very limited sampling and testing has been done. Only one sample, B-18-02, was analyzed from the "Brunswick" area- metals analyses were performed on the barren rock crushed core sample. Rise plans to mine in this area immediately along with the installation of major infrastructure.

Ind 634-99 There are egregious issues with the Chains of Custody regarding sample dates, locations and quantities. Samples from only 5 cores are represented out of 19 total cores. Eight five percent of total metals analyses (barren rock crushed cores) were performed on one core, I-19-13, while 67 % of barren rock total metals, leachate Di-WET testing, wet chemistry along with ABA testing were performed on this same core.

Ind 634-100 There are inconsistencies and omissions within this limited sampling as well. For example, S-1 is taken from core I-18-11 at a depth of 4725.6'-4725.7'. This is a total of 0.1 feet or 1.2 inches. The diabase sample above it (Y973586) is taken at 4107.8-4117.55'. What is between these two samples with 608.05 feet missing? Where did the serpentinite layer begin? How deep is the serpentinite layer beneath since sampling stopped after 1.2 inches?

Ind 634-101 Sample (Y973596) from core I-19-13 at 4767.9'-4772.7' is listed as MA in the Hydrology report but as Meta volcanic serpentinite on ALS COC. Sample (Y973597) from core I-19-13 taken from 4772.7'-4774.6' is serpentinite also. What is below this level where sampling stopped after 1.9 feet? This is known serpentinite containing asbestos.

QUALITY CONTROL ISSUES

Ind 634-102 Regarding static acid-base-accounting, page 510 of the *Appendices: Groundwater Hydrology and Water Quality* states that the following parameters are not offered for certification or are not covered by NELAC certificate #ACZ:

Neutralization Potential as CaCO3	M600/2-78-054 NV Modified Sobek Procedure
pH, Saturated Paste	EPA 600/2-78-054 section 3.2.2
Sulfur HCl Extractable	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek Procedure

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Sulfur HNO3 Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Hot H2o Extractable Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Residual Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek
Sulfur Total Procedure	M600/2-78-054 3.2.4 & 3.2.6 Modified Sobek

Lack of certification impacts validity of acid-base-accounting results for all samples: MA-1, MA-2, MA-3, MAA-1, MS-1, S-1, F-1, F-2, F-3 and F-4 (pp 495-504, Appendices: *Groundwater Hydrology and Water Quality Analysis Report*).

SILICA

Toxic air contaminants, silica and asbestos, will be produced daily in massive quantities. Silica content is assumed as 60% quoting a textbook definition of andesite rock composition. But 98% of the total rock mined is assumed to be meta-andesite. Regarding rock composition, meta-andesite rock is not just andesite....it has undergone metamorphosis becoming altered in composition. Johnston (1940) stated: "The degree of metamorphism may vary in this unit, such that parts of it have been referred to as amphibolite schist, porphyrite, diabase, and quartz porphyrite." (*The Gold Quartz Veins of Grass Valley, referenced in Groundwater Hydrology and Water Quality Analysis EMKO pg 9)*

Ind 634-103

500 tons of barren rock will be mined each day.

Mineralized ore rock, gold in quartz (100% silicon dioxide) veins, has not been accounted for in silica calculations.

1000 tons of ore rock will be mined each day.

Silica content was not tested on any samples even though the methods utilized, ICP-MS, can analyze for both Silicon (Si) and Silica (SiO_2) and more specifically can be performed by their contracted laboratory-ACZ Laboratories (*ACZ Analytical Capabilities 2017*).

What is the actual silica content of the barren rock and ore rock?

ASBESTOS

Forty-two samples were analyzed for asbestos: two blanks, 2 Centennial tailings and 38 drill core samples. The core samples were from 6 of 19 (32%) of total cores drilled by Rise: 9 samples from I-18-11, 1 sample from I-18-12, 9 samples from I-19-13, 7 samples from I-19-13A, 8 samples from I-19-14 and 4 samples from I-19-14A. The average overall length of the sample cores tested was 5.34 inches. Drilling was stopped when asbestos was detected. Drill logs are not available, therefore unable to determine depth or width of serpentinite deposit encountered. Asbestos sampling was limited. Centennial tailings were only identified by grid number-no information as to quantity, location, depth, etc.

Ind 634-104

Rise states that 1% of material mined each day will be serpentinite (*Groundwater Hydrology and Water Quality Analysis Report*, pg 93). Yet all of the geological maps located in the *Technical Report for the Idaho-Maryland Mine Project* show the quartz veins running with the

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contact points of the faults along the serpentinite deposit (AMEC 2017 pp 7-17, 7-23, 9-9, 9-11, 9-26).

The *Air Quality and Greenhouse Gas Emissions Analysis Technical Report: Earthwork and Material Handling Fugitive Dust: Construction Activity Fugitive Dust* Nov 2021 pg 300 states that the serpentinite concentration of Mine Fill will be 14.3%. How can the mine fill concentration be seven parts serpentinite when it comprises only 1 % of material mined?

"Exploration drilling was designed to test a variety of mineralization throughout the deposit in areas where mining is expected to occur." (pg 93, Hydrology Report) "Rise selected mineralized samples for metallurgical testwork by reviewing drill logs and maps. Samples were selected to represented (sic) materials representative of future mining. Factors considered in selection were gold grades, minimum mining widths, mineralization style, and locations throughout the potential mining areas." (pg. 95 Hydrology Report)

CONCLUSIONS

Ind 634-105 How can the actual ratios of rock mined be known based on this work? This information is necessary to determine emissions of toxic air contaminants such as heavy metals, silica and asbestos.

Ind 634-106 Why wasn't more testing done on the Brunswick area since mining is anticipated to begin there immediately along with the installation of major infrastructure?

Ind 634-107 How can the data from this limited sampling be extrapolated to 2585 acres being mined to unknown depths for the next 80 years?

Thank you,

Pam Heard RRT

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INDIVIDUAL LETTER 634: PAM HEARD

Responses to Comments Ind 634-1 through Ind 634-35

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-103 through Grp 7-137.

Responses to Comments Ind 634-36 through Ind 634-52

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-138 through Grp 7-154.

Response to Comment Ind 634-53

The commentor asks whether all TACs from diesel fuel consumption have been included beyond just the DPM emissions. The commenter also noted that diesel fuel is comprised of various toxic air contaminants. As stated in Appendix D of the OEHHA 2015 Air Toxics Hot Spots Program Risk Assessment Guidelines, the surrogate for whole diesel exhaust is diesel PM. PM_{10} (particulate matter, ten microns or less in size) is the basis for the risk calculations. The health risk assessment calculates health risk from diesel exhaust emissions based on estimated PM_{10} diesel particulate emissions. Therefore, based on OEHHA unit risk factors and guidelines, the health risk assessment conducted for the project accounts for all toxic air contaminants present in diesel exhaust. The cancer and chronic risk from exposure to project-generated construction and operational TAC emissions is adequately addressed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), Impact 4.3-2, of the DEIR. The DEIR included an HRA (see Appendix E.1 of the DEIR) to estimate the Maximum Individual Cancer Risk, Chronic Hazard Index, and Acute Hazard Index for residential receptors as a result of project emissions from the diesel trucks and offroad equipment; diesel-fueled generators; benzene, toluene, and xylene working and breathing loss emissions from the diesel fuel storage tank; underground blasting; ore processing; earthwork and material handling; and truck idling emissions. The HRA assessed the health risk from TAC emissions from project construction and operation and concluded that the cancer risk would be less than significant with implementation of mitigation. Furthermore, the chronic and acute risk are considered less than significant.

Response to Comment Ind 634-54

The comment notes that hexavalent chromium is found in the detonation of explosives and in Portland cement. As noted on page 4.8-47 of the DEIR, hexavalent chromium is present in cement in small quantities and usually at a concentration of about 40 ppm. Hexavalent chromium is a toxic air contaminant included in the OEHHA Air Toxics Hot Spots Program. Hexavalent chromium emissions from the project were estimated from blasting emissions underground and was included in the HRA.

Response to Comment Ind 634-55

The commenter notes that further testing of the cement paste backfill formulation is required before it will be placed in the underground mine, including locating a cement supplier with low hexavalent chromium content, leachate testing and strength testing. A cement processing plant is not proposed for the project. Cement will be delivered to the Brunswick site and loaded into a silo adjacent to the processing plant. This cement then will be mixed with partially dewatered tailings in the paste backfill plant, inside the process plant, to create cemented paste backfill. The processing plant utilizes filtration baghouses for dust control as disclosed on page 295 of Appendix E.1.

The comment asks how the amount of hexavalent chromium can be estimated when a supplier or known composition of the cement is not known. CEQA requires a good faith effort to estimate emissions from the project during construction and operation. It is common that details such as particular suppliers or vendors for a project are unknown during the drafting of documents in support of CEQA. As such, estimation of emissions during the construction and operation of the project are based on project-specific information and industry-standard emission factors. However, as discussed in Response to Comment Ind 634-59 of the Miscellaneous Pursuits Letter, when accounting for the additional hexavalent chromium, no changes to significance thresholds would occur. Additionally, Mitigation Measure 4.8-1(d) requires the mine operator to submit a Report of Waste Discharge to the Central Valley Regional Water Quality Control Board, to ensure that the selected cement paste backfill formulation meets water quality standards. In response to the commenter's question, the requirement to submit a RoWD and obtain WDRs from the CVRWQCB will ensure that the level of hexavalent chromium will meet applicable standards. Please see Master Response 21 - Conservatism of Silica Assumptions.

Response to Comment Ind 634-56

The commenter asks what type of ventilation will be used in the cement processing plant, and then asks how the DEIR can estimate the amount of hexavalent chromium when the supplier and composition of cement regarding hexavalent chromium and silica is unknown. A cement processing plant is not proposed for the project, so this would not be a source for Hexavalent chromium emissions. Cement will be delivered to the Brunswick site and loaded into a silo adjacent to the processing plant. This cement then will be mixed with partially dewatered tailings in the paste backfill plant, inside the process plant, to create cemented paste backfill. The processing plant utilizes filtration baghouses for dust control as disclosed on page 295 of Appendix E.1. Please refer to Response to Comment Ind 634-59 of the Miscellaneous Pursuits Letter for a complete response on Hexavalent Chromium.

Response to Comment Ind 634-57

The commenter further asks how the DEIR can estimate the amount of hexavalent chromium when the supplier and composition of cement regarding hexavalent chromium and silica is unknown. Please refer to Responses to Comments Ind 634-55 and Ind 634-59 of the Miscellaneous Pursuits Letter for a complete response on Hexavalent Chromium.

Response to Comment Ind 634-58

The commenter asks whether the use of explosives would cause increased Radon levels in the community and how the County would monitor Radon levels at the mine and throughout the community. The project does not have any potential to increase levels of radon present in homes near the project site and therefore no analysis of radon related impacts is required. Radon is not considered a toxic air contaminant by the OEHHA or CARB and does not have an associated reference exposure level. Please see Response to Comment Grp 8-15.

Response to Comment Ind 634-59

The commenter asserts that air emissions related to hexavalent chromium and radon are not analyzed in the DEIR. Hexavalent chromium is a toxic air contaminant included in the OEHHA Air Toxics Hot Spots Program. Dust emissions from cement loading of the storage silo is estimated at 8.5E-3 pounds per day (3.86 grams per day) as shown on page 295 of Appendix E.1. As noted on page 4.8-47 of the DEIR, hexavalent chromium is present in cement in small quantities and usually is at a concentration of about 40 ppm in typical cement. Dudek prepared a memo which is attached to the Final EIR as Appendix R to clarify that hexavalent chromium content in cement does not present a risk to public health. Hexavalent chromium was evaluated by Dudek consistent

with the methodologies presented in the DEIR. Based on the quantity of dust emissions from cement loading and an assumption of 40 ppm hexavalent chromium content in cement, total air emissions of hexavalent chromium would be approximately 154 micrograms per day. There would be no change to the cancer impacts. The mitigated chronic non-cancer health risk would not change from the results in the DEIR. The mitigated acute non-cancer health impacts would increase from 0.004 in the DEIR to 0.1; however, this would remain well below the NSAQMD significance threshold of 1.0. As such, there would be no change to impact determination in the DEIR.

The project could not have any effect on radon present in homes near the project and therefore no analysis of radon related impacts is required. The commenter does not provide any evidence indicating that there is any potential for the project to result in Radon exposure. Please see Response to Comment Grp 8-15. Radon is not a toxic air containment in the Hot Spots Program, as such no reference exposure level is available to evaluate the health risk associated with radon.

Response to Comment Ind 634-60

As discussed on page 4.8-48 of the DEIR:

> Nevertheless, it is only during the mining phase that Cr^{+6} could have any potential to leach from CPB, because that is when there would be air (oxygen) in the mine workings (Cr^{+6} can only form under oxidizing conditions). Once the mine re-floods, reducing conditions (very low dissolved oxygen levels creating a negative oxidation reduction potential) would return in the mine workings, which would prevent any leaching of Cr^{+6}. However, during mining, if there were any Cr^{+6} in the water within underground workings due to groundwater inflow, it would be reduced to Cr^{+3} (due to low oxygen levels in the water), which is relatively immobile in water and has a much lower impact on water quality than Cr^{+6}.[24] Once the water was pumped from the mine any Cr^{+3} would generally precipitate out of the water in the pond or be removed by the physical filtration unit in the WTP.

In addition, as discussed above, Mitigation Measure 4.8-1(d) requires the mine operator to submit a Report of Waste Discharge (RoWD) to the Central Valley Regional Water Quality Control Board, to ensure that the selected cement paste backfill formulation meets water quality standards. The requirement to submit a RoWD and obtain WDRs from the CVRWQCB will ensure that the level of hexavalent chromium will meet applicable standards.

Response to Comment Ind 634-61

The commenter asks whether the project would have water quality impacts related to Ammonium Nitrate Fuel Oil (ANFO). As discussed on page 4.8-48 of the DEIR, the primary residual components of the ammonium nitrate-fuel oil (ANFO) used for blasting, ammonia and nitrate, are very soluble and mobile in water. This means that any blasting residuals would be continually removed from the mine over time through the dewatering system. The proposed WTP is designed to treat ammonia and other blasting residuals that might occur due to incomplete detonation. Thus, when the mine is allowed to flood again following the completion of mining, there is no reasonable potential that residuals from former blasting activities would cause a violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Response to Comment Ind 634-62

The commenter asks whether the project will result in impacts due to asbestos in water and asks how the water will be treated to remove asbestos. Water treatment at the project site will be conducted by removal of solids from water. The sumps or tanks used underground to collect water

are designed to remove the majority of solids from the water. The water would then be pumped to main underground sumps located on various levels, then to the surface water treatment pond. Solids would be removed from water at all these stages. Under the requirements of Order R5-2022-0006 the final discharge must have less than 10 ppm total suspended solids (Average monthly) and 7 MFL (millions fibers per liter) asbestos in water.

Response to Comment Ind 634-63

Please see Responses to Comments Ind 634-61 and Ind 634-62.

Response to Comment Ind 634-64

The commenter asks what dust stabilizers will be used and in what quantities, and generally asks what impacts could result to wildlife, fire risk, and groundwater/surface water. Please see Master Response 12 – Chemical Dust Stabilizers. The chemical stabilizers would be non-toxic, non-flammable and would therefore not result in impacts to wildlife, fire risk or groundwater/surface water.

Response to Comment Ind 634-65

The commenter asks how dust suppression can be monitored in the dark. Dust generation from hauling and dumping of engineered fill during nighttime are limited to vehicle traffic on unpaved access roads and material handling of the truck drop onsite. As stated on page 38 of Appendix E.1, unpaved roads shall be treated with chemical stabilizers in order to control fugitive dust. This treatment is only done every few weeks[6] and therefore it is unlikely that it would be applied in the dark. Any dust control used on materials dropped by the truck at night would be from water sprays and does not require sunlight. Any air monitoring devices that are in place during operations would not require sunlight to function.

Response to Comment Ind 634-66

The commenter asks what the aesthetic, noise, wildlife and pollutant stream direction impacts would be from installation of wind barriers. Wind barriers are one of several possible methods for dust control of inactive disturbed surface areas and storage piles that will remain inactive for more than seven days under the Asbestos Dust Mitigation Plan (ADMP). (see Page 2-19 of the DEIR.) The details of the ADMP will be determined during the submission and approval process with the Northern Sierra Air Management District. Only one of these methods is required and wind barriers may not be proposed in the ADMP. The commenter does not provide any evidence that wind barriers, if required by the NSAQMD as part of the ADMP, would have the potential to cause any significant impact, and there is no evidence that such impact could result. As such, the analysis of aesthetics, noise, wildlife, and pollutant stream impacts for wind barriers would be speculative and is not required under CEQA.

Response to Comment Ind 634-67

The commenter asserts that the DEIR does not mention the fact that fencing will be installed around the Centennial Site, and asks what impacts will occur to wildlife due to fencing on both project sites. As stated on page 3-42 of the DEIR, all access locations at the project sites are gated and secured. Additional fencing around the aboveground facilities may be installed as part of the proposed project, if deemed necessary for security and safety. Additionally, private security services would be provided by the Project Applicant. Generally, this fencing would be along the Brunswick and E. Bennett Roads to discourage trespassers and around the paved areas of the main site where the mine entrances and facilities are located. Animals would be excluded from the operational areas of the site, but no barricades prevent them from using the undeveloped

[6] See Table 11.1 of NIOSH Dust Control Handbook 2nd edition

areas of the site, including the South Fork Wolf Creek and the forest and meadows remaining on the property.

Proposed fences have been included in renderings prepared for the aesthetics report (Appendix D of the DEIR). Therefore, the aesthetics impact of the fencing has been evaluated.

Response to Comment Ind 634-68

Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 634-69

AERO MAXGOLD 900 and AERO 407 are not proposed to be used by the project.

Response to Comment Ind 634-70

Please see Master Response 10 - Explosives, Reagents, and Brunswick Fill.

CuSO4, PAX, Aero 208, Aerofroth 65, and Soda Ash are not proposed to be used in mineral processing. Regarding the latter, pages 4.7-28 and -29 of the DEIR are hereby revised for clarification purposes, as follows:

> The warehouse building would include storage of common reagents, such as collectors, promoters, frothers, and flocculants, all of which would be used in the gold recovery process conducted in the process plant. These reagents are needed in the gold recovery process to provide a more environmentally friendly alternative to cyanide, which will not be used. According to the Hazardous Material Inventory Statement for the Brunswick Industrial Site, common names of the proposed reagent chemicals include Aerophine, Methyl Isobutyl Carbinol (MIBC), and Magnafloc 10~~, and Soda Ash~~. Aerophine is known as a promoter or collector, used in flotation to increase the floatability of minerals in order to effect their separation from the undesirable mineral fraction. Flotation is an industrial process for selectively separating valuable minerals from non-valuable minerals. The applicant has selected Aerophine over xanthates as the latter can generate carbon disulfide upon decomposition, which is known to be a highly toxic and flammable compound with potential risks to the health and the environment. Magnafloc 10 is known as a flocculant, which help aggregate fine suspended particles to form larger flocs so that the solids can more easily be separated from the water. Magnafloc 10 is not expected to bioaccumulate in organisms, its chemical family (polyacrylamide) is relatively non-toxic, and it is not readily biodegradable into more environmentally problematic chemicals.[16] MIBC is a frother used to create foam to facilitate froth flotation of gold minerals in the gold recovery process. Based on available data, MIBC has a low bioaccumulation potential and exhibits low toxicity to aquatic organisms.[17] ~~Soda Ash is used in gold flotation to control alkalinity.~~ These reagents have various properties, some of which are described above. Whereas some are flammable (e.g., MIBC), others are not ~~(e.g., Soda Ash)~~. The reagents would be removed from the concentrate and sand tailings during the dewatering stage conducted in the process plant using filter presses. All reagents have specific storage requirements that would need to be met on-site, as verified by the Fire Marshall's Office prior to commencement of operations.

The above minor changes are for clarification purposes and do not alter the conclusions of the DEIR.

Response to Comment Ind 634-71

The flammability of reagents to be used in mineral processing is generally discussed in pages 4.7-28 and -29 of the DEIR.

Response to Comment Ind 634-72

Evacuation routes are adequately assessed in Chapter 4.13, Wildfire, of the DEIR, in particular, Impact 4.13-1. Performing mock scenarios for community preparedness is beyond the scope of the EIR and not required pursuant to CEQA.

Response to Comment Ind 634-73

The comment does not address the adequacy of the DEIR, but notes that Grass Valley Air Attack Base and Grass Valley Emergency Command Center are both located at the Nevada County Air Park, in a Very High Fire Hazard Severity Zone. The commenter's concern is unclear. The proposed project would not impact the Air Park.

Response to Comment Ind 634-74

The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers for their considerations. Please see Master Response 1.

Response to Comment Ind 634-75

The Nevada County Emergency Operation Plan – Annex B – Mass Evacuations does not include incidents of fires caused by accidents related to Rise operations or any other project. As stated in Annex B, the purpose of the plan is to establish County, City and other agency responsibilities and concept of operation for support of a mass vehicular evacuation moving within or through the County that has been caused by a disaster or incident occurring outside of Nevada County.

https://www.nevadacountyca.gov/DocumentCenter/View/15704/Annex-B---Mass-Evacuation-PDF

The commenter's other statements in this comment do not relate to the adequacy of the DEIR. Comment noted.

Response to Comment Ind 634-76

The commenter states that an isolated fire burning on the Brunswick site has the potential to ignite numerous flammable materials releasing hazardous pollutants which could then be transported by prevailing winds into Grass Valley and environs. The commenter does not identify these "flammable materials." As stated on page 4.13-20 of the DEIR:

> The County Fire Marshall's Office has indicated that a comprehensive vegetation management plan will be necessary for the Centennial and Brunswick Industrial Sites. Once approved, the plan shall be adhered to, in perpetuity with the project. While the applicant has prepared an FPP to address, among other things, the long-term on-site management of fuels, initial construction activities and the use of heavy equipment on-site for vegetation removal could exacerbate wildfire risk. The vegetation management plan component shall be inclusive of both the Centennial and Brunswick Industrial Sites, as well as construction and operational activities, and be reviewed and approved by the Fire Marshall's Office. According to the local fire agencies, including CAL FIRE, whose primary responsibility it is to provide wildland fire suppression for both Sites, ongoing implementation of a vegetation management plan would reduce wildfire risk at the Sites to a less-than-significant level.[9]

Mitigation Measure 4.13-2 of the DEIR requires ongoing implementation of a Vegetation Management Plan for the project and would reduce the project's potential impact to a less than significant level.

Response to Comment Ind 634-77

The commenter asks what pollutants may enter the creeks should there be a fire on one or both of the project sites; however, the commenter does not provide any details as to what pollutants would enter the creek should a fire occur at the project site. The future effects of a fire, location of such a fire, or equipment or materials involved is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As the impact of a fire is speculative, this impact need not be analyzed in an EIR. Nonetheless, the DEIR requires that the mine operator obtain coverage under the Industrial General Permit, prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). Implementation of the SWPPP will ensure that pollution from industrial activities on the site, pre- and post-fire, would not impact surface waters.

Response to Comment Ind 634-78

The project truck traffic accounts for only approximately 1% of typical traffic on Brunswick Road and would not affect an evacuation. Please see Master Response 5 – Evacuation Zones. If an evacuation were taking place on Brunswick Road, the project's trucks would be redirected along with other traffic on Brunswick Road or would be parked at either the Brunswick or Centennial sites. It is approximately 2.3 miles from the Brunswick site to Highway 49/20 along Brunswick Road, with an approximate 4-minute driving time. Therefore, it is only a short drive for the one or two project trucks to return to the site if requested to do so by local authorities.

Response to Comment Ind 634-79

Brunswick Road is classified as a Minor Arterial Road in the Nevada County General Plan. See Table 4.1 of the Circulation Element. Minor Arterials are defined in the General Plan as roadways providing primary access from freeways and principal arterials to major origins and destinations (e.g., Brunswick Road and Donner Pass Road); https://www.nevadacountyca.gov/DocumentCenter/View/12576/Chapter-4-Circulation-2010-PDF

Response to Comment Ind 634-80

The DEIR (page 4.12-89) analyzed loaded trucks on the downhill section of Brunswick Road, approaching the Loma Rica Drive signals during poor weather. This portion of Brunswick Road is already regularly used by heavy-duty haul trucks. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather. Mitigation Measure 4.12-6(e) requires the applicant to install a sign just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.

Response to Comment Ind 634-81

Truck traffic from the project would not interfere with the safe and efficient movement of people and goods. Please see Chapter 4.12 of the DEIR which discusses transportation and traffic issues.

Response to Comment Ind 634-82

Two 12,000-gallon above ground diesel fuel tanks are proposed for the project as stated in the DEIR (e.g., Table 3-5, Table 3-9, page 4.13-24). The original application proposed a single large tank, but this was revised during the DEIR preparation.

Response to Comment Ind 634-83

As stated in the Well Mitigation Plan (Appendix K.9), the applicant would pay for both the monthly fixed service charges and volumetric service charges. This reimbursement would be for the price of water incurred and would include any "drought surcharges" if NID billed such a surcharge to the property owner. A property owner would be subject to the same drought limitations imposed similar to any other NID customer.

The commenter states that the applicant should pay for water for any parcel connected to NID water supply for the life of the mine, even after the parcel is sold or annexed into the City of Grass Valley. The Well Mitigation Plan (Appendix K.9 of the DEIR) takes a conservative approach and presumes that an owner who decides to connect to the NID system has been impacted by and at the fault of the mining operation, even if no impact to groundwater well supply has occurred. As such, the Well Mitigation Plan was designed to be even more conservative than Nevada County General Plan Policy 17.12, which requires an impact as a prerequisite to the obligation to pay for water, which policy states "If it is determined that the operator is at fault, impacted owners shall be compensated by the operator." A new homeowner would not be impacted because the impact would have previously occurred, and the cost of purchasing water from NID for that new homeowner would be the same as buying any other home connected to NID's water supply. The provision of free water as a selling feature to a new buyer is not contemplated by the policy. If a property was annexed into the City of Grass Valley, it would be subject to the ordinances of the City, which allows water wells to only be used for irrigation purposes only (Grass Valley General Ordinance Section 13.16.020) and would therefore require a property owner to connect to the potable water supply and pay for their water use. As annexation of a home into the City would already require connection to NID water supply and purchase of NID water, continuation of payment for water by the applicant after annexation would be a windfall to the property owner rather than mitigation of an impact, and is not required by CEQA or County policy.

Response to Comment Ind 634-84

The electricity use estimate includes 3 main ventilation fans, 2 booster ventilation fans, and 10 auxiliary ventilation fans. All fans would be located underground once the service shaft is constructed. There is only one emission source from the underground mine at the Brunswick shaft where mine ventilation air is exhausted. The ventilation fans distribute air throughout the mine workings and are not themselves emission sources in the HRA since the fans are powered by electricity, rather than diesel engines.

Response to Comment Ind 634-85

The emergency generator emissions during a 24-hour power outage are shown in Table 4.3-25 on page 4.3-104 of the DEIR. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 4.3-25 are for informational purposes only. Nonetheless, the Health Risk Assessment prepared for the DEIR assumed emergency generators operated for up to 100 hours per year, as stated on page 23 of the HRA (page 384 of Appendix E.1).

Response to Comment Ind 634-86

As shown in Table 4.7-2 of the DEIR, insurance for explosives transport is regulated by 49 CFR 387, which specifies the minimum levels of financial responsibility for motor carriers.

Response to Comment Ind 634-87

The timing of mining in areas above the 1000-foot level has not been estimated and will depend on exploration success, operational priorities and mining schedules. However, as shown on Sheet

15 of Appendix K.2, most of the known mineralization is greater than 1000 feet below ground surface (bgs).

Response to Comment Ind 634-88

The commenter's concerns are addressed through Mitigation Measure 4.7-2(b) of the DEIR, which states:

> *4.7-2(b)* *If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site improvements, work shall stop in the area of potential contamination, and the type and extent of contamination shall be identified by a Registered Environmental Assessor (REA) or qualified professional. The REA or qualified professional shall prepare a report that includes, but is not limited to, activities performed for the assessment, summary of anticipated contaminants and contaminant concentrations, relevant Environmental Screening Levels for identified contaminants, whether the contaminants exceed Environmental Screening Levels, thus warranting remediation, and recommendations for appropriate handling and disposal. Site improvement activities shall not recommence within the contaminated areas until any necessary remediation identified in the report is complete. The report and verification of proper remediation and disposal shall be submitted to the Nevada County Planning Department for review and approval.*

Response to Comment Ind 634-89

A Hazardous Materials Business Plan (HMBP) has not been submitted and is not required to be submitted for the CEQA process. Mitigation Measure 4.7-1(c) requires the HMBP to be submitted and approved by the County prior to the use or storage of hazardous materials or explosives on-site.

Response to Comment Ind 634-90

The mitigation fee for the Nevada County Local Traffic Mitigation Fee (LTMF) is calculated through the preparation of a nexus study that is updated every five years and approved by the Nevada County Board of Supervisors.

The various traffic improvement mitigation fees do not consider project-specific traffic routes. These fees are designed to pay for planned roadway improvements throughout the County based on priorities and budgets presented in the nexus studies prepared for each fee program.

In regards to Brunswick Road, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

The Regional Transportation Mitigation Fee (RTMF) development impact fees are collected by the County and deposited into the account specific to the RTMF, to help fund construction of the regional system of roads, streets, and highways needed to accommodate growth in western Nevada County. These fees are "sufficient" to fund the project's impacts to projects that are included in the RTMF. However, the intersection at Brunswick Road / SR 174, is currently not

included in the RTMF and therefore the project's impact to this intersection has been found to be significant and unavoidable despite the requirement to pay the project's fair share to the improvement of this intersection under Mitigation Measure 4.12-1(c).

Responses to Comments Ind 634-91 through Ind 634-107

These comments are a duplicate copy of content in Group Letter 7. Please see Responses to Comments Grp 7-155 through Grp 7-197.

Individual Letter 635

From: BOS Public Comment
To: Matt Kelley; Brian Foss; Caleb Dardick
Subject: FW: MINE...and Yours
Date: Tuesday, March 8, 2022 7:38:39 AM
Attachments: Mine- Sciences clear Mar. 6.rtf

Dist 2

From: Pamela Kissler <pamkissler@att.net>
Sent: Sunday, March 6, 2022 8:23 AM
To: BOS Public Comment <BOS.PublicComment@co.nevada.ca.us>
Subject: MINE...and Yours

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Ind 635-1 Dear Folks, who will be making a decision which will have tremendous impact on our health, our families' livelihood, our children's future, our environment and wildlife, our property value, and our overall quality of life...I don't envy you.

Ind 635-2 This decision regarding the opening of the Idaho-Maryland mine is monumental in it's potentially negative impact on so much we hold dear. I cannot personally see EVEN ONE redeeming benefit to re-opening the mine. After reading everything I can find about the situation for the past few months, and watching videos regarding the impact of previous re-openings, I believe we have nothing to gain and everything to lose by allowing Rise Gold to invade our home and cause such devastating damage to us.

Ind 635-3 Being the recipient of dishonest and misleading advertisements from Rise Gold, I imagine that they are not above Bribery to get what they want - Free access to our land without the need for due diligence, following the rules, keeping their empty promises, or having any regard for us or our land.

Thank you for listening to the many voices in Nevada County protesting this re-opening.

Sincerely,
Pam Kissler

INDIVIDUAL LETTER 635: PAM KISSLER

Response to Comment Ind 635-1

The comment does not address the adequacy of the DEIR, but expresses general concern regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 635-2

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 635-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 636

SCIENCE IS CLEAR

Science is clear but Rise Gold's most recent mailing is anything but. Rather, it is an intentionally misleading attempt to skew the facts regarding the mine reopening.

Has the mine reopening been approved?
No, Nevada County has NOT just completed anything regarding approval of the mine reopening. The county Board of Supervisors has yet to conduct its first meeting to discuss the contents of the draft environmental study. They have not yet fully considered nor approved the contents of the study. No final determination has been made as to the accuracy of the scientific analysis, anticipated impacts, or adequacy of the proposed regulation of a reopened mine.

Ind 636-1

The DEIR (DRAFT Environmental Impact Report) has not laid to rest anything. Rather, the report enumerates 83 impacts, 32 of which are considered significant enough that they will require some measure of intervention so as to make them not as bad as they actually are anticipated to be. Some impacts are so severe, there is nothing that can be done, we will just have to live with them. We are being asked to accept a lower quality of life in Grass Valley.

Ind 636-2

None of these concerns have been "put to rest". There remains grave concerns about drained wells, spoiled aquifers, polluted water ways, destroyed habitats, dust, exhaust, noise, and airborne chemicals associated with the transportation of waste and by gold extraction. There is no confirmation that there will not be spills, seepage, accidents, oversight, or callous disregard of regulations or safety practices.

What is the DEIR?
The DEIR's only purpose is to lay out the ways in which the reopened mine will impact our environment and the possible ways some of these impacts could be dealt with. This report was compiled for and paid for by Rise Gold. It is important to note that this report was limited by and relied exclusively on information provided to the consulting firm by Rise Gold, and many of the conclusions reached in the report are based on assumptions and best case scenarios. The report does not guarantee in any way what will be the actual outcome. The fact remains, the mining industry is the single largest source of toxic waste and one of the most destructive industries in the country. Today's industrial mining involves the blasting, deep excavating, and crushing of acres of land and the use of huge quantities of toxic chemicals such as cyanide and sulfuric acid.

Ind 636-3

But what about the new jobs?
Rise Gold states we can expect 612 new jobs, 312 of which are directly related to the mine

Ind 636-4

operation. The other 300 are presumed to be increases in our current employment base, in response to the estimated 50 million new dollars being poured into our community. Two thirds of the 312 mine employees are to be current local residents. The remaining 104 employees, would be the top paid technical and managerial positions. Are any of these highly trained specialized employees already a part of our local community? Or will these positions more likely be outsourced? Will adding 104 new Grass Valley residents really induce a new local spending increase of $50M each year?

Ind 636-5

Do mine workers really earn $122,000 a year?
When Rise Gold says "average", they are including all salaries, including the top 1/3 salaried positions in the calculation of that average. This includes the CEO's anticipated very generous salary. Furthermore, Rise Gold's estimated worker earnings includes company-paid benefit costs that the employee never sees in their paycheck. The reality is an entry-level Miner can expect to earn an average total compensation (includes bonus and overtime pay) of $18.55/hour, based on a survey of typical existing salaries. An early career Miner earns $20.26, and an experienced Miner with 10-19 years of experience earns $27.56. (source: payscale.com). Truck drivers, janitors, front load operators, security staff, etc. will all be making the current going rate, with or without a mine.

Ind 636-6

Do we get to keep the gold? No, we don't. All of the gold and all of the profits will be leaving Grass Valley. The city of Grass Valley and Nevada County will not be receiving a piece of the gold pie. Any profits will go to the owners and shareholders of Rise Gold.

Ind 636-7

So what's in it for us?
That is a very good question. Grass Valley assumes all of the risks, and for what? It's a case of trading the family cow for a handful of magic beans. We would be risking so much for so very little; throwing away our beautiful quiet community, our neighbors, our scenery, our streams and rivers, our air quality, our water quality and habitat, our well paved traffic free streets, our peace and quiet, and our tax dollars for mitigation and reparation—24/7 for the next 80 years; for what?

Please let the Board of Supervisors know what you want for your community. email: BOS.PublicComment@co.nevada.ca.us

INDIVIDUAL LETTER 636: PAM KISSLER

Response to Comment Ind 636-1

The commenter expresses general concerns regarding the DEIR but does not identify specific issues. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Ind 636-2

For concerns regarding well impacts, please see Master Responses 14 and 15; for concerns regarding polluted waterways, please see Master Response 35; for concerns regarding habitat loss, please see Chapter 4.4, Biological Resources; for concerns related to dust and airborne chemicals, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to exhaust, please see the health risk assessment (DEIR Appendix E.1), the results of which are incorporated into Chapter 4.3; for concerns related to noise, please see Chapter 4.10, Noise and Vibration; and for concerns related to spills, please see Chapter 4.7, Hazards and Hazardous Materials.

Response to Comment Ind 636-3

The DEIR evaluates the proposed project's consistency with applicable policies, regulations, and standards established at the federal, State, and local levels and incorporates analyses from the County's expert consultants, which includes independent third-party peer reviews of the technical reports provided by the applicant team. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. As such, the analysis within the DEIR is adequate and meets the requirements set forth by the CEQA Guidelines.

In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project. Because significant and unavoidable impacts have been identified in the DEIR, for which feasible mitigation measures cannot reduce the potential impact to a less-than-significant level, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

The commenter's generally noted concerns related to the proposed project are noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Response to Comment Ind 636-4

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 636-5

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 636-6

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 636-7

The comment does not address the adequacy of the DEIR. Please see Response to Comment Ind 636-2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 637

From: Pamela Biery <pamela@pamelab.com>
Sent: Wednesday, March 23, 2022 9:30 AM
To: Idaho MMEIR; Dan Miller; Heidi Hall; Ed Scofield; Hardy Bullock; susan.hoek@nevada.ca.us
Subject: MMEIR Comments

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Dear Nevada County Planners and Board of Supervisors,

Please stop Rise Gold's Mine Idaho-Maryland mine proposal.

Ind 637-1 1. The re-opening of the Idaho-Maryland Mine would mean opening 360,000 gallons of toxic water which are now contained underground, possibly returning it to the local rivers and streams. No adequate plan is in place for the unquantified problems that may arise from this hazardous waste, which is now contained.

Ind 637-2 2. Having 24/7 heavy equipment moving the waste from one site to another on a route that passes 4 nursing homes and a hospital, as well as a planned commercial corridor.

Ind 637-3 3. Mining activity puts local homeowners at risk of losing water and immediately devalues their homes.

Ind 637-4 4. The company proposing the project is Canadian and is barred from mining in Canada currently due to ongoing litigation.

5. Grass Valley is on a pathway of supporting tourism and local business. This activity endangers millions in tourism income. This tourism income is local and benefits thousands of Nevada County residents.

These factors don't even account for the mine itself and other possible negative outcomes of ongoing operations.

Ind 637-5 Please follow Canada's example: do not let Rise Gold mine in Nevada County.

Sincerely,

Pamela Biery
Grass Valley, CA

PamelaB.com
Thumbler.net

530.218.2027 c

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INDIVIDUAL LETTER 637: PAMELA BIERY

Response to Comment Ind 637-1

As discussed in Section 3.4.1.1 of Appendix K.2, the water in the mine contains only iron and manganese above state water quality guidelines. The proposed on-site water treatment plant has been designed to adequately treat iron and manganese to state standards. The water treatment plant will be permitted by the State prior to its approval and operation. For further detail, please see Mitigation Measure 4.8-1(a).

Response to Comment Ind 637-2

The specific concern of the commenter is unclear. Nevertheless, the following response is offered. Health risks from diesel equipment, including haul trucks, is addressed in Chapter 4.3 of the DEIR. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Response to Comment Ind 637-3

The comment does not directly address the adequacy of the DEIR. Property value is outside the scope of CEQA. For groundwater concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 637-4

Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 637-5

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 638

From: Pam Jung <pfjung65@gmail.com>
Sent: Saturday, March 19, 2022 10:04 AM
To: Idaho MMEIR
Cc: Pam Jung
Subject: The Mine

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Ind 638-1

Have you folks been paying attention to the comments in The Union? All against the mine (I think it might have been Jeff Kane who said a survey showed 80% at least say NO TO THE MINE).
In light of this what more will it take for the Planning Commission and Board of Supes to shoot down this project once and for all. It's been a stupendous waste of time, as it's been before when this issue has surfaced.
Just say NO to reopening any mine now and in the future.
We'll save ourselves time, energy and tempers.
Pam Jung
Grass Valley
P.S. I've saved all the articles in The Union about this issue...so If anyone want me to wheelbarrow them into chambers, let me know.

1

INDIVIDUAL LETTER 638: PAMELA JUNG

Response to Comment Ind 638-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 639

From: Pamela Whitman <pamwhitman@yahoo.com>
Sent: Monday, April 4, 2022 10:57 AM
To: Idaho MMEIR; Matt Kelley; bdofsupervisors
Subject: Community input regarding Rise Gold Id-Md Mine DEIR

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To Matt Kelley, Senior Planner, the Planning Commission and Nevada County Board of Supervisors,

I have been a resident of Grass Valley for almost 24 years and love and appreciate the rural quality of our environment. We live off of You Bet Rd, near Hwy 174, and use Brunswick Rd as our main route to town. I have been working to grasp the big picture of the potential impact of the Rise Gold Mine on our community and want to share with you some thoughts based on my research.

Ind 639-1

I have reviewed the DEIR for Rise Gold's proposed reopening of Idaho-Maryland Mine. The fact of 83 negative impacts to our small rural community, only 32 of which have proposed mitigation, is unacceptable in itself, but the 'significant and unavoidable impacts' are enough to stop this project in its tracks now! We also have to keep in mind that this report was paid for by the mining operation and was based on their information, so it in no way can be presumed to be the final word nor represent the complete picture. Their claim that "The Science is Clear" is in itself not scientific! As a graduate of MIT with a background in science (and humanities), I take issue with such cavalier use of the term 'science.' This should raise a red flag for us from the start.

Ind 639-2

In particular, with regard to Aesthetics (4.1-2), there would be substantial damage to scenic resources and conflicts with several applicable zoning requirements (including building height limits, steepness of slopes, required set-backs, etc.). Section 4.1-4 lists cumulative long-term changes to the visual character of our community. If this operation were in the middle of a desert, instead of in the middle of our community, these issues might not be so pressing, but given our situation, this already makes it a non-starter. This would forever be 'the elephant in the room' that we would have to live around.

Ind 639-3

Traffic (4.12-1) would be significantly impacted on Brunswick Rd, a major road (not a 'minor arterial') in our community that I frequently use. Adding 100 roundtrips of trucks per day would totally change the character of this area. As stated above, inserting a major industrial operation in the midst of our rural town is inconsistent with the nature of our community.

Ind 639-4

Noise levels (4.10) have already proven to be unacceptable during the exploratory drilling. Despite whatever levels may be officially deemed 'acceptable,' they are not acceptable to the community. When this is put in the perspective of a 24/7 operation over 80 years, there can be no justification or benefit to the community to warrant this forfeiture of our basic right to peace and quiet. It is interesting to recall the story that most of us probably have heard, how the owners of Empire Mine only stopped their 24hr a day operation of the stamp mills for a period of 24 hours when their daughter got married on the grounds. This isn't the life we want to return to. This is our past, not our future. The toxic waste

from Empire Mine is still being dealt with, and there are areas where it is cordoned off, since it is still not safe to walk there.

Ind 639-5 Given the challenges of climate change and the historic drought conditions in California, perhaps the most daunting question relates to water. The Hydrology report relied on very limited data, not taking into account outflow rates that were higher than reported and operating on the faulty assumption that there is no seasonal variation in groundwater levels. Over 300 wells could be immediately impacted, with the possibility of many more. Water is our most precious resource—*more so than gold!* We can't afford to squander it, threatening groundwater as well as creeks, aquifers and habitats. We can see how the failed San Juan Mine permanently damaged wells in the 1990's. Since the mineral rights extend over 2500 acres from 200' below the surface, there is no guarantee that wells throughout our area (over 1800 properties) might not also be affected. No matter how beautiful our home, without water it loses all value.

Ind 639-6 Our air quality is already often poor. We shouldn't even be considering a project that has the potential to add even more toxic pollution from various sources. It would also create even more greenhouse gases (estimated at 13 metric tons/yr) that would completely undo our County Environmental Action Plan.

Ind 639-7 Power consumption is projected to be 12% of the current NC usage, the equivalent of adding 5000 new homes to our area! We already struggle with power outages, and the increase use of fossil fuels would offset our plan to combat climate change.

Ind 639-8 Despite their slick advertisements, we are not fooled. Rise Gold offers little to our community but asks so much from us. Mining creates the fewest jobs of any industry, especially downstream in the local community. If they get approval for this project and fail (as is in their history!), they could pull out and sell the rights to another company. In the past, they reportedly failed to report leakages of toxic material (https://s3.documentcloud.org/documents/3539874/Banks-Island-Gold-Charges-March-2017.pdf), or to clean up the site. See also https://www.canlii.org/en/bc/bcca/doc/2020/2020bcca299/2020bcca299.html?searchUrlHash=AAAAAQASImJlbmphbWlulG1vc3NtYW4iAAAAAAE&resultIndex=1 and https://www.bccourts.ca/jdb-txt/sc/20/01/2020BCSC0167.htm. We don't want to risk being left in this situation here. Rise Gold has demonstrated it is not a good-faith partner for a business that would transform our community in so many negative ways.

Ind 639-9 To me, the big picture is: This is a toxic business that poses significant and unavoidable risks to our community. It creates many unmitigated impacts that we would be expected to bear. We are being asked to carry the risk, lower our standards, bend the rules, renege on our climate change efforts, forfeit the character of our community and the quality of our environment—but for what? Money from the endeavor would not stay here—and no amount of money could bring back what was lost in the process. Home values would inevitably drop, so we would actually lose revenue.

Ind 639-10 How can our Planning Commission confidently make recommendations—and our Board of Supervisors make decisions— that will negatively affect literally every aspect of our community life 24/7 for the next 80 years? I urge you to reject this proposal, as it is inconsistent with our needs, values and the future we would like to create.

Thank you for your thoughtful consideration,
Pamela Whitman

2


Pamela T. Whitman, M.A.
Painting Therapist
Teacher of Light, Color and Darkness

INDIVIDUAL LETTER 639: PAMELA WHITMAN

Response to Comment Ind 639-1

The commenter states that the many impacts listed in the DEIR should be grounds to disapprove the project. The commenter also appears to suggest that the DEIR is biased because it was paid for by the Project Applicant and based on their information. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

Response to Comment Ind 639-2

The commenter is concerned about the project's adverse impacts to aesthetics. As stated on page 4.1-22 of the DEIR, the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings. Implementation of Mitigation Measure 4.1-2 would reduce the significant impact by requiring more dense plantings along the project frontages to screen project structures to the maximum extent feasible. However, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. As stated on page 4.1-29, long-term changes in visual character associated with the project in combination with cumulative development, is cumulatively considerable and significant and unavoidable.

Response to Comment Ind 639-3

The commenter states that Brunswick Road would be significantly impacted by project-generated traffic and that Brunswick Road is a major road, not a "minor arterial." The DEIR identifies Brunswick Road as a minor arterial road. (DEIR, p. 4.13-15.) The commenter also states the project is inconsistent with the surrounding community. As stated on page 4.13-15 of the DEIR, according to the Table 4.1 of the Circulation Element of the Nevada County General Plan, Brunswick Road is considered a Minor Arterial. The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersection at Brunswick Road and State Route 174 (LOS impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable. Regarding the project's consistency with the surrounding community, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 639-4

The DEIR appropriately focuses solely on the impacts of the Idaho-Maryland Mine Project and not prior exploratory drilling. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter states that the project's noise-related impacts are unacceptable. The DEIR found that the installation of the potable water pipeline would produce a temporary significant and unavoidable impact. (DEIR, p. 4.10-30.) For all other noise-related impacts, the DEIR found that the project impacts would be less than significant, in some cases after implementation of mitigation measures identified in the DEIR. (DEIR, p. 4.10-31, 37, 59.) Lastly, the commenter states that a prior operator of the mine utilized stamp mills and produced toxic waste. The project does not propose to use stamp mills and the scope of the DEIR does not address actions by prior operators of the Idaho-Maryland Mine. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Ind 639-5

The commenter states that the DEIR's analysis of groundwater impacts is based on limited data and faulty assumptions, and that the DEIR underestimates the number of potentially impacted groundwater wells. The commenter also implies that the Project Applicant could expand operations within the mineral rights boundary and affect more groundwater wells. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 639-6

The commenter is concerned that the project would adversely impact air quality. The commenter is referred to Master Response 18 - Air Quality Thresholds, Master Response 25 - Nevada County Energy Action Plan, and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 639-7

The commenter is concerned about the project's energy consumption. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan, and Master Response 27 - Greenhouse Gas Thresholds. As stated on page 4.11-35 of the DEIR, PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission.

Response to Comment Ind 639-8

The commenter states that jobs produced by the project would be of little value to the community and that the Project Applicant is not trustworthy based on past mining projects. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 639-9

The commenter is generally opposed to the project but does not discuss specific inadequacies with the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

Response to Comment Ind 639-10

The commenter urges the County to not approve the project. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 640

From: pat henderson <hendersonpat181@gmail.com>
Sent: Thursday, March 31, 2022 12:29 AM
To: Idaho MMEIR
Subject: mine

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Ind 640-1

I doubt that you, the Board of Supervisors will live another eighty years to witness the complete devastation of our beautiful community if you vote to reopen the mine. It is very evident that an overwhelming majority of the people do not want this to happen. Please vote in favor of the people! I personally would like the people to vote and not the Board of Supervisors. The Board has the power to make this change and you should consider doing it. It really is the right thing to do for such a serious matter.
Pat Henderson
Grass Valley

INDIVIDUAL LETTER 640: PAT HENDERSON

Response to Comment Ind 640-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 641

From: pabby
To: Idaho MMEIR
Subject: well
Date: Saturday, February 12, 2022 2:10:32 PM

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Ind 641-1

I own property quite near the Idaho Maryland Mine and am STRONGLY oppose to the reopening for a myriad of reasons, not the least of which is my water supply. I have already been negatively affected by the purposed project. During the exploratory drilling the deeded spring, which has served 4 homes for 90 years, went dry. My neighbors and myself had to scramble to drill wells at considerable personal cost. Of course there is no proof that the drilling is what caused the spring to go dry, but it happened co-incidentally with the action, and pursuing legal action is cost prohibitive. Although Rise Gold says they will supply water through NID if wells go dry. Are they planning on paying the monthly costs? I think not! There's also issues with noise, traffic on small roads and infrastructure, and housing for personnel. I feel it's a bad idea all around.

Please DO NOT give them a permit

Thank you, tax payer Patricia Bennett 11273 Lava Rock Ave. Grass Valley CA 530-366-5615

INDIVIDUAL LETTER 641: PATRICIA BENNETT

Response to Comment Ind 641-1

For the commenter's well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 642

From: Patrick Johnson <patrickpuppet@gmail.com>
Sent: Saturday, April 2, 2022 8:03 PM
To: Idaho MMEIR; DEIRcomments@cea-nc.org
Subject: DEIR woefully inadequate and overly optimistic

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Nevada County Planning Commission,

Ind 642-1 After reviewing the DEIR, I find it to be woefully inadequate and overly optimistic. The document underestimates the negative impacts that reopening the Idaho-Maryland Mine will have on our environment by not satisfactorily addressing the impacts that the mine will have on our air, water and soil quality—not to mention the mine's contribution to noise pollution.

Gold mining is a proud part of Grass Valley's history and heritage. However, one of the sad and enduring legacies of the local gold mining industry is environmental ruin. When mines operated for 24 hours a day, streams were polluted with waste-water runoff, forests were cleared for lumber, the air was blackened by the operation of industrial machines, and the deafening pounding of stamp mills could be heard for miles around.

Ind 642-2 The DEIR has not convinced me that the Idaho-Maryland mine will not have a negative impact on our local environment.

Once Rise Gold Corp has extracted all the riches from the Idaho-Maryland Mine, they will pack up their carpetbags, head back to Canada, and leave our children and grandchildren with an environment in ruin. In this age of drought and wildfire, let's not add the consequences of mining to the list of environmental disasters that plague this region.

Thank you,
Patrick Johnson
Grass Valley resident

1

INDIVIDUAL LETTER 642: PATRICK JOHNSON

Response to Comment Ind 642-1

The commenter states that the DEIR is woefully inadequate but does not provide any specific evidence to support this claim, other than it does not satisfactorily address mine impacts to air, water, and soil quality, as well as noise. As discussed in Master Response 1, such general statements do not warrant specific responses under CEQA Guidelines. Please see the respective chapters of the DEIR for such concerns (4.3, 4.8, 4.7, 4.10).

Response to Comment Ind 642-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 through 3, and 16. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 643

I support re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

NO MINE! I DO NOT SUPPORT THIS

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 800 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 643-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) Patti Grijalva

Address 12915 Lost LAKE RD, GV ZIP 95945

Phone 530-263-7827

Email Address grijalva4000@yahoo.com

INDIVIDUAL LETTER 643: PATTI GRIJALVA

Response to Comment Ind 643-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 644

I am writing in opposition to the reopening of the mine by Rise Gold and their mother company.

Ind 644-1 Other than the obvious issues of excessive truck traffic laden with hazardous materials taken to be piled into mountains in the Brunswick area, and the need to widen Brunswick and E. Bennett streets to accommodate the traffic, with the added noise of diesel trucks and equipment pumping excessive exhaust pollution into the air near residential areas – there is the problem of water.

Ind 644-2 Rise gold and affiliates will have to pump millions of gallons of water out of the shafts to clean in order to operate. This water, they contend, will be clean 'enough' to dispose of into Wolf creek where it will be used by home owners, businesses, farms and ranches for drinking, cooking, irrigation and bathing our babies. If this water is as safe as they suggest, then why is it not recycled for their own use as opposed to raping the needed water from our community. They want millions of gallons from us every day instead of recycling what they already have. We have been in a drought for many years. Commercial businesses in town and residents should be our priority over a corporation that boasts that they will be a boon to our community. That is a bare-face lie. As a commercial building owner on Mill St. I am very concerned over the longevity of our prosperous communities.

Ind 644-3 The Idaho-Maryland mine closed in the mid 50's when 174 was still a dirt road with 49 a winding two-lane road. Population of Grass Valley was 2500 people with lake Olympia in Brunswick. Since then, the towns have grown up around it. It became a lumber mill for a great many years, with a mill also on E. Bennett. Brunswick basin grew into a commercial hub, Cedar Ridge enlarged along with Peardale, and then there is Whispering Pines adding to the commercial businesses. The former mine is now a small space locked inside a thriving community that has miles of shafts and tunnels beneath the surface that will certainly impact all with its fingers.

Perhaps 80 years of sucking us dry of Rise Gold and their affiliates enriching themselves at our expense is worth it? Roadway congested, vibrations from detonations, property values plummeting, wells drying up, businesses failing – reduction of our quality of life.

Ind 644-4 In the 1800's, ghost towns have occurred when mines have dried up. Grass Valley and Nevada City have blossomed when the mine closed. Let's not turn us into a ghost town by reopening it.

Paul D Crovo

125 Mill St

13187 N Meadow View Dr

INDIVIDUAL LETTER 644: PAUL CROVO

Response to Comment Ind 644-1

The commenter's statement about the need to widen Brunswick Road and E. Bennet Road is not supported by the roadway segment analysis in the DEIR, which determined that widening is not required to accommodate project traffic (see Table 4.12-13 of the DEIR). Regarding transport of toxic waste, the commenter is referred to Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 644-2

Please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 644-3

The comment does not address the adequacy of the DEIR. Please see Master Response 1.

Response to Comment Ind 644-4

The comment does not directly address the adequacy of the DEIR. For general concerns related to vibration, please see Chapter 4.10, Noise and Vibration; for general concerns regarding well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value and quality of life concerns are outside the scope of CEQA – please see Master Responses 1 and 2.

Individual Letter 645

March 31, 2022

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Paul B Elias
12125 Crystal Spr Rd.
Grass Valley, CA 95945

County of Nevada - Planning Dept.
950 Maidu Ave. Ste 170
PO Box 599002
Nevada City, CA 95959

Subject: Definitions Correction - They Make a Difference to Idaho Maryland Mine Project EIR Draft

Dear Planning Dept. -

Please make the correction where noted in referenced draft EIR that the Nevada County Laura Rico Airport is not a SMALL Craft Airport! Perhaps that's a definition used at one time and in the out-of-date County general plan but not correct definition in the EIR ~~matter~~. draft.

Ind 645-1

The FAA has no reference to "Small Craft Airport" as stated in the mine's draft EIR. According to the FAA's airport definitions as easily found on their webpage, the Laura Rico Airport is defined as: General Aviation Airport: Basic. Please make note + correct within the draft.

Best Regards, Paul B Elias

INDIVIDUAL LETTER 645: PAUL ELMS

Response to Comment Ind 645-1

Please see Response to Comment Ind 664-2.

Individual Letter 646

From: Jane McGrew
To: bdofsupervisors
Subject: Please reject the proposal from Rise Gold
Date: Wednesday, March 23, 2022 4:17:13 PM

Dist 1

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Ind 646-1

Dear board of supervisors,
As a physician, I am opposed to anything that could pose a risk to the health and wellbeing of our community.
I realize that documents have been submitted that seem to suggest reopening the Idaho Maryland Mine would only be beneficial, this is simplistic reasoning motivated by the hope of profit.
Risking harm to our way of life and health by this huge industrial undertaking is not worth possible damage to our air and water quality or the tranquility we so enjoy.
Let future generations thank us for our good stewardship of our natural treasures instead of cursing us for being greedy.

Sincerely,

Paul G. McGrew
12481 Hillcrest Dr.
N.C., 95959

INDIVIDUAL LETTER 646: PAUL MCGREW

Response to Comment Ind 646-1

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds.

Regarding water quality concerns, please see Chapter 4.8, Hydrology and Water Quality. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 647

Matt Kelley, Senior Planner
950 Maidu Ave, Suite 170
Nevada City, CA 95959

April 2, 2022

Ind 647-1

Table 2-1 Summary of Impacts and Mitigation Measures lists the concern:
4.3-4 Result in the inefficient or wasteful use of energy. This concern is addressed as mitigation measure -- none needed. How can this be?

Rise's own estimates of the amount of power and particularly electrical power is huge and undermines/conflicts with the State and County energy reduction plans. The ways that Rise suggests that energy can be conserved and not wasted is to mostly ride on the coattails of PG&E and other providers who are actively working to develop and use alternative sources such as solar, electrical, wind, and/or biomass. (section 4.3-4 pdf page 379) Rise's plan to not be *inefficient or wasteful* is to use massive amounts of electrical energy that is partly generated by these "green" sources.

Sadly, Rise projected use of electricity for a one-year construction period is 16,513,00 kWh (pdf 394). This wipes out the Nevada County effort that conserved 13,034,571 kWh in 10 years ending in 2019. The county plans to reduce energy demands won't be attained and instead because of Rise, usage will increase significantly.

Ind 647-2

Rise did find some very small ways to reduce the amount of energy, but it is less than significant compared to the amount they will use. The main strategy was to buy their way out with carbon offsets that doesn't deal with the huge increased need for electricity and the draw on the grid in this area.

Rise misses possible ways that align with the county energy plans. Looking at Table 4.3-22 Project Consistency with Nevada County Energy Action Plan Energy Reduction Measures; Goal 2; Renewable Energy – Expand the Utilization of Renewable Energy and Resilience Measures (4.3-89-90).

> The county goal Strategy 2.1: Prepare for the inclusion of renewable energy systems in new construction and large retrofit projects in-order-to meet California Zero Net Energy Goals by providing informational material when available.
> Project's role: Pertains to solar photovoltaic systems in all residential construction and large retrofit projects. County to implement the provision of informational materials. Not applicable to the project because the project consists of mining activity and industrial type development.

Why can't an industrial project that is constructing new buildings include renewable energy systems? Why does this type of construction with large buildings with large roof surfaces be used for to generate some solar power? What is missing in the DEIR is what ELSE Rise will do to

reduce its dependence on electricity. Rise isn't planning on installing solar panels on its steep sided hills, none are planned on the roof tops of the big buildings, parking won't be covered by roof top solar panels either (think Briar Patch).

The mining operations consume massive amounts of electrical energy. The data from the DEIR is briefly compared in the chart below.

For the purpose of comparison, the mWh unit (MegaWatt hours = 1000 kWh) used in the DEIR is converted to kWh (kilowatt hours)

Phase	mWh units annually	kWh annually	Total kWh
Construction - 1 yr	16,513	16,513,000	16,513,000
Operations –79 yrs	49,613	49,613,000	3,919,427,000
		Grand Total	3,935,940,000

Source: page 4.3-88)

Ind 647-3

The County's Energy Action plan for unincorporated areas of the county (https://www.mynevadacounty.com/DocumentCenter/View/35183/Nevada-County-Energy-Action-Plan) from 2017 cited a combined usage of 344,045,975 kWh for residential, non-residential and combined county agencies. Rise would use more than 10 times as much electricity as the rest of the unincorporated county in one year. A letter to the Union dated July 2, 2021 compares the mine's energy use to adding 5,500 homes to the community. This huge demand conflicts with the EAP goal for 2035 of reducing the demand for electricity by 51% which is an energy savings of 202,936,611 kWh (pre-Rise additions).

Table 4.3-23 is the Annual Estimated Green House Gas Emissions that PG&E supplied electricity generates given in Metric Tons (MT)

Years	CO_2	CO_2e Gases equivalent to CO_2
2021-construction/dewatering	1527.82 MT	1542.97 MT
2022-2032	4590.43 MT	4635.82 MT
2027-2032	4590.43 MT	4635.82 MT
2033-2102	4590.43 MT	4635.82 MT

.

This chart shows that indirectly the use of electricity isn't as "Green" as we'd like to think. It adds a significant amount of pollution / greenhouse gases into the atmosphere. It's not being generated at the mine but it is being produced for the mine. The mine DEIR doesn't include any mitigation that deal with the increase in pollution and its cumulative effect of GHGs from the electricity it will consume.

To review:

- The massive amounts of electrical energy required for mining operations is in conflict with the County's Energy Plan and energy reduction/conservation goal.
- The Mine's consumption will stress the capabilities of the electrical grid and cause large increases in pollution.
- The range of mitigations proposed are few and inadequate to address the reducing the use of "traditionally generated" electricity.

Respectfully,

Paul McMillan

Greenhorn Rd, Grass Valley

INDIVIDUAL LETTER 647: PAUL MCMILLAN

Response to Comment Ind 647-1

The commenter states that the project's energy consumption is wasteful and conflicts with State and/or County energy reduction plans. As stated on page 4.3-102 of the DEIR, implementation of the project in combination with other cumulative development would not result in the wasteful or inefficient use of energy. Please also see Response to Comment Agcy 8-17. Because the project would not conflict with a local plan to increase energy efficiency and reduce energy consumption, a less-than-significant impact would occur. The commenter is also referred to Master Response 25 – Nevada County Energy Action Plan.

Response to Comment Ind 647-2

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project and points to the Nevada County Energy Action Plan (EAP) reduction goals. Compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis.

Response to Comment Ind 647-3

This comment reiterates concerns regarding the project's energy consumption. The commenter is referred to Response to Comment Ind 647-2.

The project's air emissions and GHGs emissions are analyzed in Chapter 4.3 of the DEIR and are less than significant after mitigation. The commenter is also referred to Master Response 27 - Greenhouse Gas Thresholds.

As discussed on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the project would be supplied by the existing 12kV PG&E line along Brunswick Road. The BRUNSWICK 1102 Circuit (Circuit), which would serve the project, has a rating of 13.26 MW. The project's total connected load is estimated at approximately 10 MW, with a net load of approximately 6 MW. As of the year 2021, the Circuit operates at 5.15 MW, or approximately 39 percent of the Circuit's maximum capacity. Based on PG&E's usage projections, the Circuit load is anticipated to drop to approximately 4.74 MW by the year 2025. Considering the project would generate an electric load of approximately 6 MW, and the Circuit currently provides 5.15 MW, the Circuit capacity would increase to 11.15 MW following implementation of the project. The increase in wattage associated with implementation of the project would remain within the Circuit's capacity of 13.26 MW and, thus, the Circuit would have available load capacity to accommodate the project.

Individual Letter 648

3-13-2022

To: Matt Kelley, Senior Planner, Nevada County Planning Department

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Idaho.MMEIR@co.nevada.ca.us

From: Paul S. Schwartz

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Attention: Nevada County Planning Department, Nevada County Planning Commission and Board of Supervisors

Comments on the DEIR for the Proposal to Reopen the Idaho Maryland Mine

Ind 648-1

1. 4.10-1, 2, 3- From one section of the Noise and Vibration report (Pg 4-10-45) "It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or standards of other agencies, and the project's noise impacts could be significant." Seriously consider the setting and context as well. We are a rural community where noise levels are low in contrast to the constant background noise of traffic and urban activity in other cities and counties. Protecting and preserving the quality of our noise landscape is the right thing to do. The property is not currently zoned for heavy industrial mining operations. This is a General Plan designation made with community support and reflecting both community values, environmental integrity, and economic forethought.

Ind 648-2

2. The technical Reports reveal the energy requirements and the carbon footprint of the proposed Idaho Maryland Mine (IMM) enterprise are in conflict with the General Plan Energy Action Plan. The mine will require an energy increase equivalent to 12% of the current Nevada County energy load. In addition, it will require doubling the amount of energy currently used by the entire Nevada County commercial energy use. The document discounts the standing and relevancy of the Nevada County Energy Action Plan. Although implementation of the plan is in its infancy, the intent and goals are very clear. A project seeking an 80-year operating permit needs to fully address consistency with those goals and intent. At a minimum, a mitigation requiring an energy efficiency and carbon reduction plans revealing how Rise Gold intends to operate in the spirit of the Energy Action Plan.

Ind 648-3

3. The entire analysis of impacts to natural underground water systems lacks the data and analysis to accurately describe potential impacts to existing and future wells in the surrounding residential community. Changes in the natural underground water system resulting from massive dewatering need to be fully and accurately investigated. Projections need to be evaluated against industry know outcomes in similar mining operations to reveal the accuracy of these types of analysis. Similar gold mining enterprise in our county have dried and contaminated wells during the dewatering process. This is difficult to provide ongoing oversight without a clear long term funded plan for the 80-year permit. A plan that includes clearly defined oversight and periodic review and reporting. The plan should include methods, means, and clearly designated roles and responsibilities to monitor and mitigate conditions and damages to underground water sources for this part of the community. For instance, what are the first conclusive indicators of impacts to the natural underground water supply and what is

the action plan? Rise Gold needs to be required to provide a comprehensive plan and allow time for a peer review process to insure we understand the risks, indicators, and responses.

Ind 648-4

4. The DEIR fails to clearly outline strategy to mitigate dust and particulant pollution from the rock processing and transporting. Because of the risk associated with asbestos and other airborne hazards, manual wetting with water trucks and hoses is not good enough. A mitigation that describes an automated mechanical solution the trucks must go through and be washed and watered down before leaving the IMM or Centennial property is needed. In addition, for the rock processing, piling, and truck loading process, a system of overhead sprinklers or similar is needed to insure a constant level of quality throughout the enterprise. The DEIR must describe a mitigation plan that is more robust than providing on site water trucks and gravel pits for the trucks to drive through.

Ind 648-5

5. Policy related to view sheds, aesthetics, and community character in the General Plan are ignored. An example is the description of Brunswick Road as a minor arterial ignores the fact it is an entryway into the Brunswick basin and Nevada City. As an entryway it will continue to grow in importance and traffic volume. It represents for many guests to our community the first impression they will have and should not be dismissed because it does not have a scenic designation. We all know the cliché about how difficult it is to alter first impressions. A large part of our economy is derived from tourism, recreation activities, and the Arts. Protecting how we are perceived is critical to our long-term economic success. Over time the section of Highway 174 through Cedar Ridge into Grass Valley will see traffic levels flatten and Brunswick Road will become busier and busier. Caltrans investments and improvements to Highway 174 clearly show the importance of this route into our community and Brunswick Road should be recognized and protected from development that impacts its future success as an entryway and major arterial. This section of the traffic analysis and aesthetics impacts needs to be re-evaluated and reworked.

Ind 648-6

6. The DEIR analysis in each section is poorly organized and fails to describe or explain how proposed mitigation measures would reduce impacts to acceptable levels. The cumulative effect to our community of the negative impacts is poorly analyzed, dismissed, and ignored. Chapter 2, 2.5 Areas of Known Controversy includes 23 bullets to describe the breadth of the negative impacts the project carries with it. Mitigation Measures must be clear, feasible, and achievable. They must show how we can measure and determine the proposed mitigated outcome.

Ind 648-7

7. 3.0- "New underground workings would be below 500 feet from ground surface." What about existing workings that are less than 500 feet from the surface? Will these be properly filled and no longer used?

Ind 648-8

8. 4.1-1 "Have a substantial adverse effect on scenic vista" The analysis dismisses the height and massive rock infill that would be several stories high in the current IMM valley and rising above Brunswick Road. In addition to that are the multi-story buildings that require variances because they are more than double the acceptable height of buildings as defined in our General Plan and County regulation. How is this Less than Significant (LS) and how does Not Applicable answer to this Negative Impact? The next item in the table outlines a generic landscape plan that is proposed as a solution. This might be OK for a bank or a Wendy's, but it does not respond to the massive change to the viewshed or the extremely tall buildings.

Ind 648-9

9. 4.1-3 "Create a new source of substantial light and glare which would adversely affect day or night time views in the area." The DEIR designates this LS and mitigations as NA. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly residential. Introducing "substantial" new light and glare into the setting and dismissing the impact is unacceptable.

Ind 648-10

10. 4.3-1 Traffic controls on Highway 174 improvements resulted in 20-30 minutes waiting for the pilot vehicle. If you lived within the project area, one trip could add one hour to your travel time. There needs to be a specific traffic management plan that puts more on the contractor and impacts the traffic flow more efficiently for drivers. Scheduling construction delivery and future trucking to off hours is a good idea. What are the off hours and how is this enforced? The Construction Exhaust Minimization Plan needs to be revealed now as part of the DEIR or specific performance and enforcement standards brought forward. Elements of the plan should not be allowed to be ignored because its inconvenient, costly, or outside the critical path. The project must meet the Federal 8-hours ozone Standard and employ all feasible NOX mitigations to achieve satisfy NSAQMD thresholds. This needs to be spelled out in the EIR.

Ind 648-11

11. 4.3-2 The proposed Asbestos Dust Mitigation Plan should be detailed in the DEIR. This is a large part of the negative impacts the project will have on the neighborhood and the community. The generalized statements offered as mitigation measures are insufficient and potentially ineffective. Previous NSAQMD requirements for similar projects included paving in work areas and automated watering systems as opposed to water trucks and gravel drive through pits. The mitigation should include automated wheel washing technology for all vehicles operating on unpaved surfaces. A spray misting system may be required to subdue harmful dust from project operations. The EIR should describe and include as a mitigation available technology that removes harmful fibers from air exiting the mine. In addition, description of an asbestos monitoring program should be part of the EIR and subject to NSAQMD review.

Ind 648-12

12. I am concerned about adding significant flows to South Fork Wolf Creek. I was a Wolf Creek Alliance stream care volunteer and adding millions of gallons a day would increase erosion and downstream sedimentation. It would challenge wildlife populations that live in the stream zones. Determining the impacts are less than significant (LS) and mitigations are not needed (NA) is foolishness. Plans for special status species, wetland protections, erosion controls, culvert replacement and monitoring program needs to be spelled out in the EIR.

Ind 648-13

13. Given everything we know about Rise Gold's senior leadership and their history in British Columbia, what protections do we have that they will honor agreements and perform professionally. Does Nevada County government have the capacity to inspect, police, enforce, litigate, and control Rise Gold's performance? This maybe outside CEQA analysis, but it is relevant to the detail required in any mitigation or controlling regulation, variance, and oversight agreement.

Ind 648-14

14. Community character is also not specifically analyzed in the CEQA exercise. Yet, community character is at the heart of all the Sections. Nevada County, Grass Valley, Nevada City and Truckee have prospered over the last 40 years. Our down towns are strong and endured economic downturns, Amazon, covid, wildfires, and power outages. New on-line sales revenue sharing regulation is helping to offset the out of town purchasing and sales tax dollar exodus as folks shift spending to on-line. The strength of our economy, based on Economic Resource Council data, is rooted in technology, R&D, seniors, government, tourism, recreation, stewardship, and healthcare. We are perceived as a tourist and recreation destination. Do we want that perception to change to one of an industrial mining town? Mining is our past, not our future.

Ind 648-15

15. 4.3-4 "Result in the inefficient or wasteful use of energy" This is a negative impact and the DEIR finds it LS or less than significant and mitigations as NA (Not Applicable). We live in an era struggling to get our arms around climate change, wild fires, and drought. One element at the heart of this all-encompassing area of study is energy use and carbon footprint. How is it possible that a project that could double the commercial power use in Nevada County be

defined as less than significant? This is wrong and needs new analysis. The Nevada County Climate Action Plan calls for significant energy and carbon reductions. This project must participate in that process.

Ind 648-16

16. 4.3-5 "Conflict with State or local plans for renewable energy or energy efficiency." DEIR designates LS and NA. The Nevada County Energy Action Plan calls for energy and carbon reductions moving forward. The specific language in the Energy Action Plan may be weak and waffle at times it should be specific. However, the intent is there. The goals are there. The Rise Gold IMM project EIR must respect the intent of the local plan and State plans. The EIR must include an energy efficiency plan that shows reducing energy use over the length of the permit. The reductions should be frontloaded. One example of a real mitigation would be to require a portion of the property committed to a solar farm sized to support the project energy use. We require solar infrastructure on new homes, new enterprise must participate in the solution.

Ind 648-17

17. 4.3-7 Carbon Offsets- this family of mitigations should set the standard for what is expected. A mitigation must be CLEAR, FEASIBLE, AND ACHIEVABLE. If the County relies on a future plan or a future action, then the mitigation must identify clear performance standards.

Ind 648-18

18. 4.4-1 ADD- All landscape, habitat mitigations, transplanting, and seed propagation will include weekly monitoring by a qualified biologist to ensure success including the health and prosperity of the plant life. Restoration bonds should be implemented to fund this responsibility for the length of the mining enterprise.

Ind 648-19

19. 4.5-3 Retain a credentialed archeologist to be familiar with the history of the properties and be available to respond in concert with the Sheriff/ Coroner should human remains or Native American artifacts be unearthed. Artifacts would indicate human remains may be in the area.

20. The archeologist will establish contact with the Native American community before the project begins to better understand their wishes should an actionable event occur.

Ind 648-20

21. 4.11-7 NID has not agreed to fully commit an unlimited water supply to Rise Gold's IMM project and potential water service to homes with residential well failures. Rise Gold underestimates the potential for damage to existing and future residential well performance. The LS and NA designations are incorrect.

Ind 648-21

22. 4.12-4 Rise Gold must include pedestrian and bicycle lane improvements along the length of the Brunswick Road and Bennett Street property.

23. Alternative #1: The No build option is the correct answer. Develop according to the existing land use designation shown in the County General Plan with consideration for current contemporary planning philosophy that reflects planning ideas not consistent in an older Nevada County General Plan. For instance:

- Include pedestrian and bike corridors to connect with Grass Valley, Empire Mine, and Memorial Park.
- Minimize impacts on sensitive habitats and species.
- Require energy efficiency and carbon reduction plans. Require solar farming to reduce dependency on the power grid and energy consumption consistent with the County Energy Action Plan.
- Include open space for animal corridors, visual and scenic integrity.

Ind 648-22

The DEIR describes the No Project alterative in terms that maximize the development of the Brunswick property. This is not how it would go. This is an amazing important piece of property because of its location in this part of the County at an entryway to the Brunswick Basin. It is located near Empire Mine State Park and Grass Valley. It is flat. **There are many possible uses that would add synergy to the existing thriving local economy that fall within the existing General Plan use designation and are not hard rock mining.** I suggest current thinking of business parks might lean toward mixed use with housing and retail and seek to create a campus environment that is pedestrian friendly. Possible uses that are consistent with a Nevada County economy that has been growing in a sustainable positive direction for at least four decades are: Utilities, Manufacturing, Information, Science & technology, Real Estate, Professional, Arts, Entertainment, and Recreation. All of these would create more jobs, use less energy, have lower carbon footprints, have larger jobs and enterprise building multipliers, and generate more local wealth.

INDIVIDUAL LETTER 648: PAUL SCHWARTZ

Response to Comment Ind 648-1

As stated on page 4.10-45 of the DEIR, the implementation of Mitigation Measure 4.10-3 would reduce the potential significant noise impact to a less than significant level. The noise analysis of the DEIR considers ambient noise levels at receptor locations. Please see Chapter 4.10 of the DEIR.

As stated on page 4.9-16 of the DEIR, subsurface mining is allowed in all base districts subject to approval of a Use Permit. Surface access to subsurface mining, including vent and escape shafts, is allowed in the AG, FR, M1, M2, P, and PD base districts subject to approval of a Use Permit. Surface mining is allowed in the AG, FR, M1, M2, P, PD, and TPZ Districts and where the property is zoned ME, subject to approval of a Use Permit and Reclamation Plan.

Response to Comment Ind 648-2

Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 648-3

Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. Note that based on the groundwater model, which was peer reviewed by the County's independent experts, only 7 wells are expected to have a significant drawdown effect from the project. The groundwater impact analysis and related mitigation was peer reviewed by the County's independent experts, who provided input on the analysis and mitigation. Connection to NID water supply at the applicant's cost is provided for 30 parcels, although only 7 are expected to have a significant impact. With regard to unexpected impacts to wells beyond the 7 expected impacted wells, and the total of 30 parcels that are being provided access to NID water supply, as discussed in Chapter 4.8 of the DEIR, Mitigation Measures 4.8-2(a) and 4.8-2(b) require that monitoring wells be installed in the vicinity of the project and that additional baseline data be collected for 12 months prior to dewatering. Likewise, Mitigation Measure 4.8-2(b) requires that during dewatering, data from the monitoring wells is used to assess whether local groundwater wells would be impacted, which in the case of a significant impact would then trigger investigation and immediate replacement of water supply by the applicant at the applicant's cost.

As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells (water level and water quality) within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 648-4

The commenter states that the DEIR underestimates the level of asbestos exposure that could be caused by the project and strategies to mitigate dust and asbestos emissions. However, the Health Risk Assessment is based on conservative assumptions that likely overestimate asbestos exposure. Please see Master Response 22 – Conservatism used for Asbestos Assumptions.

As stated on page 4.3-42 of the DEIR, use of the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission and subsequent implementation of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction, and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

As shown in Table 3-9 of the DEIR, mobile tire washing plants are proposed to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed. As shown in Figure 3-8 of the DEIR, all roads outside of the engineered fill piles are proposed to be paved. Therefore, vehicle tires will not require washing as they leave the Brunswick site onto public roads and would not leave visible track-out material on public roads. If necessary, the onsite paved roads could be cleaned to ensure employee and other vehicles do not track dust onto public roads. Mitigation Measure 4.3-2 provides several options based on Section e(4)(A)(2) Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. The project proposes mobile tire washing plants to be used to wash truck tires of vehicles leaving non-paved areas where engineered fill would be placed and not rely on gravel pads or 50 feet of pavement to capture dust. Any sediment from tire washing would be captured onsite by the washing plant and disposed of onsite alongside the engineered fill being placed.

For clarification purposes, Mitigation Measure 4.3-2, on page 4.3-83, has been revised to add the word "or" in bullet point 3 to clarify that a gravel pad is not required if a wheel wash system is employed.

- *All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device. Sweeping or vacuuming on public roads shall be conducted so as to avoid peak AM and PM traffic hours.*
- *A gravel pad designed and maintained to effectively clean tires of exiting vehicles, or a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project.*

The above change is for clarification purposes and does not alter the efficacy of the mitigation measure, nor conclusions of the DEIR.

Response to Comment Ind 648-5

As stated on page 4.13-15 of the DEIR, according to Table 4.1 of the Circulation Element of the Nevada County General Plan, Brunswick Road is considered a Minor Arterial.

As discussed on page 4.1-2 of the DEIR, according to the California Department of Transportation (Caltrans) Scenic Highway Program, State Route (SR) 20, 49, and 174 within Nevada County are eligible State Scenic Highways. Eligible state scenic highways, while recognized for aesthetic quality, are not officially designated as scenic highways. Only SR 49/SR 20 has views of the project sites. As SR 49 passes through Grass Valley, it is posted as both SR 49 and SR 20. At the north end of Nevada City, SR 49 turns west toward North San Juan, after which the north-south highway turns east and becomes SR 20. The entirety of SR 49 proceeds in a northbound/southbound direction. As the portion through Grass Valley is oriented north-south, it is therefore referred to throughout the DEIR's analysis as SR 49. The Brunswick Industrial Site is approximately two miles from SR 49 and the Centennial Industrial Site is approximately a 0.5-mile from SR 49.

Notwithstanding the above, as noted in Chapter 4.1, Aesthetics, the DEIR concludes that implementation of the proposed project would result in a substantial degradation to the visual character or quality of the Brunswick Industrial Site as viewed from Brunswick Road, and after implementation of mitigation, the impact would remain significant and unavoidable.

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 648-6

The comment states that the DEIR is poorly organized and fails to describe how mitigation measures would reduce impacts to acceptable levels and that mitigation measures must be clear, feasible, and achievable. However, the commenter provides no specifics or evidence as to its assertions and is referred to Chapter 4 of the DEIR.

The DEIR analyzed the project's potential impacts with respect to baseline conditions, as defined in the DEIR, in addition to reviewing potentially significant cumulative impacts based on known or planned development in the region. CEQA Guidelines section 15130 requires an EIR to discuss cumulative impacts of a proposed project. Cumulative impacts are impacts created because of the combination of the proposed project with reasonably foreseeable future projects. DEIR section 5.3 summarizes the cumulative impacts analysis, and each resource analysis in each technical chapter of the DEIR includes an analysis of cumulative impacts specific to that resource.

The commenter states that Section 2.5 of the DEIR includes negative impacts of the project. As stated on page 2-8 of the DEIR, this list consists of areas of controversy that were identified in NOP comment letters and are otherwise known for the project area. Impacts of the project in all the listed subjects are analyzed in the DEIR. See Chapter 4 of the DEIR.

Response to Comment Ind 648-7

Except for the construction of the Service Shaft, no blasting would take place closer than 500 feet to surface. Historic workings above this elevation may or may not be backfilled or used and are not required to be filled. Please see Master Response 29 - Near Surface Workings.

Response to Comment Ind 648-8

As stated on page 4.1-14 of the DEIR, examples of typical scenic vistas include mountain ranges, ridgelines, or bodies of water as viewed from a highway, public space, or other area designated for the express purpose of viewing and sightseeing. In general, a project's impact to a scenic vista would occur if development of the project would substantially change or remove a scenic vista. The County General Plan does not identify any scenic vistas in the vicinity of the Centennial or Brunswick Industrial sites. Impacts to views of the project sites from SR 49, which is included within the County's Scenic Corridor Combining District (SC), are discussed under Impact 4.1-2. Thus, the proposed project would not have a substantial adverse effect on a scenic vista, and a less-than-significant impact would occur.

Response to Comment Ind 648-9

The analysis in DEIR Section 4.1-3 does not consider the previous industrial activity at the site in the analysis. Rather, the determination of less than significant is based on substantial evidence provided in the form of a photometric plan for the Brunswick Industrial Site, inclusive of lighting types and projected lumen intensities across the site. As stated on page 4.1-24 of the DEIR, based on the photometric plan:

> […] the lighting intensities at the northern property line, near East Bennett Road, are at 0.0 foot-candles[9], and thus, light spillover is not projected to occur off-site. The nearest proposed pole-mounted LED, which is International Dark Sky Association compliant, would be located approximately 100 feet from East Bennett Road. Thus, the existing sensitive receptor along New Brunswick Court would not be impacted by light spillover from the proposed on-site lighting. Similar conclusions can be made for the remainder of the property boundaries, based on the Photometric Plan; no light spillover is projected to occur at the property boundaries.

As stated on page 4.1-29 of the DEIR, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, and a less-than-significant impact would occur. Please see Section 4.1-3 of the DEIR.

Response to Comment Ind 648-10

The beginning of the comment related to Highway 174 is unclear. The project does not propose any traffic improvements on Highway 174.

Mitigation Measure 4.3-1(a) requires that temporary traffic control shall be provided during all phases of construction to improve traffic flow, as deemed appropriate by the local transportation agencies and/or the California Department of Transportation and construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable. As shown in Table 4A of Appendix O of the DEIR, peak hours vary for various intersections but are 7:45AM to 8:45AM and 4:30PM to 5:30PM on Brunswick Road near the Brunswick Industrial Site (intersections 12-17).

Mitigation Measure 4.3-1(b) requires that prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The mitigation measure provides specific requirements as stated on pages 4.3-77 and 4.3-78 of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Specific traffic management plans and the Construction Exhaust Emissions Minimization Plan are not required for the analysis of the DEIR, but will be required before the construction activities, as specified in Mitigation Measures 4.3-1(a) and 4.3-1(b). Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 648-11

The Asbestos Dust Mitigation Plan must be approved by the NSAQMD, is required pursuant to specific performance standards and regulatory requirements as set forth in Mitigation Measure 4.3-2, and is not required to be completed and approved for the analysis of the DEIR. Under California case law, compliance with a regulatory permit or other similar process may be identified as mitigation under CEQA if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards. (CCR Title 14 Section 15126.4.) Please see Response to Comment Ind 648-4.

Response to Comment Ind 648-12

Based on substantial evidence in the DEIR, the proposed mine water discharge would not cause substantial erosion or sedimentation in South Fork Wolf Creek or significant impacts to sensitive aquatic species. Please see Chapter 4.8 of the DEIR, Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 33 - Groundwater Dependent Vegetation.

Response to Comment Ind 648-13

Please see Master Response 3 - Operator Responsibility.

Response to Comment Ind 648-14

Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 648-15

Please see Master Response 25 - Nevada County Energy Action Plan, Master Response 27 - Greenhouse Gas Thresholds, Response to Comment Ind 648-16, and Response to Comment Agcy 8-17.

Response to Comment Ind 648-16

Compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and the project was determined to be consistent with the EAP. Please see also Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis, although these GHG reducing policies will ultimately reduce the project's carbon footprint.

Response to Comment Ind 648-17

Mitigation Measure 4.3-7(b) provides extensive and detailed requirements and standards for carbon offsets. Please see page 4.3-96 of the DEIR and Master Response 28 - Greenhouse Gas Credits.

Response to Comment Ind 648-18

The commenter requests that a mitigation measure be added to require all landscape, habitat mitigation, transplant, and seed propagation to include weekly monitoring by a qualified biologist and for restoring bonds to be imposed for the length of the mining enterprise. The commenter does not identify any deficiencies in the DEIR nor significant impacts that would require this mitigation. Numerous regulations and mitigation measures are already imposed on these project activities, as described in Chapter 4.4 of the DEIR, and the mitigation measure proposed by the commentor is not required for the project.

Response to Comment Ind 648-19

Mitigation Measure 4.5-3 requires any person who, in the process of project activities, discovers any human remains within the project area, shall cease from all project activities within at least 200 feet of the discovery. In the event that human remains are encountered, the sheriff-coroner shall be notified immediately upon discovery. In the event that Native American human remains are encountered, the Native American Heritage Commission or the most likely descendants of the buried individual(s), who are qualified to represent Native American interests, shall be contacted. Specific treatment of Native American human remains shall occur consistent with State law.

Response to Comment Ind 648-20

An unlimited supply of water from NID is not required for the project. Please see Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 648-21

The commenter states that rise gold must include pedestrian and bicycle lane improvements along the length of Brunswick Road and Bennett Street property. These improvements and are not required for the project to mitigate any significant impact, and the impact from project-generated vehicle miles travelled is less than significant. Please see Section 4.12-5 of the DEIR.

Response to Comment Ind 648-22

The commenter's preference for the No Project Alternative (Alternative #1) is noted for consideration by the County decisionmakers. Please also see Response to Comment Ind 388-6.

Individual Letter 649

3-13-2022

To: Matt Kelley, Senior Planner, Nevada County Planning Department

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From: Paul S. Schwartz

13812 Meadow Drive, Grass Valley CA 95945

psschwartz21@gmail.com

Attention: Nevada County Planning Department, Nevada County Planning Commission and Board of Supervisors

Comments on the DEIR for the Proposal to Reopen the Idaho Maryland Mine

Ind 649-1

1. 4.10-1, 2, 3- From one section of the Noise and Vibration report (Pg 4-10-45) "It is conservatively concluded that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or standards of other agencies, and the project's noise impacts could be significant." Seriously consider the setting and context as well. We are a rural community where noise levels are low in contrast to the constant background noise of traffic and urban activity in other cities and counties. Protecting and preserving the quality of our noise landscape is the right thing to do. The property is not currently zoned for heavy industrial mining operations. This is a General Plan designation made with community support and reflecting both community values, environmental integrity, and economic forethought.

Ind 649-2

2. The technical Reports reveal the energy requirements and the carbon footprint of the proposed Idaho Maryland Mine (IMM) enterprise are in conflict with the General Plan Energy Action Plan. The mine will require an energy increase equivalent to 12% of the current Nevada County energy load. In addition, it will require doubling the amount of energy currently used by the entire Nevada County commercial energy use. The document discounts the standing and relevancy of the Nevada County Energy Action Plan. Although implementation of the plan is in its infancy, the intent and goals are very clear. A project seeking an 80-year operating permit needs to fully address consistency with those goals and intent. At a minimum, a mitigation requiring an energy efficiency and carbon reduction plans revealing how Rise Gold intends to operate in the spirit of the Energy Action Plan.

Ind 649-3

3. The entire analysis of impacts to natural underground water systems lacks the data and analysis to accurately describe potential impacts to existing and future wells in the surrounding residential community. Changes in the natural underground water system resulting from massive dewatering need to be fully and accurately investigated. Projections need to be evaluated against industry know outcomes in similar mining operations to reveal the accuracy of these types of analysis. Similar gold mining enterprise in our county have dried and contaminated wells during the dewatering process. This is difficult to provide ongoing oversight without a clear long term funded plan for the 80-year permit. A plan that includes clearly defined oversight and periodic review and reporting. The plan should include methods, means, and clearly designated roles and responsibilities to monitor and mitigate conditions and damages to underground water sources for this part of the community. For instance, what are the first conclusive indicators of impacts to the natural underground water supply and what is

the action plan? Rise Gold needs to be required to provide a comprehensive plan and allow time for a peer review process to insure we understand the risks, indicators, and responses.

Ind 649-4

4. The DEIR fails to clearly outline strategy to mitigate dust and particulant pollution from the rock processing and transporting. Because of the risk associated with asbestos and other airborne hazards, manual wetting with water trucks and hoses is not good enough. A mitigation that describes an automated mechanical solution the trucks must go through and be washed and watered down before leaving the IMM or Centennial property is needed. In addition, for the rock processing, piling, and truck loading process, a system of overhead sprinklers or similar is needed to insure a constant level of quality throughout the enterprise. The DEIR must describe a mitigation plan that is more robust than providing on site water trucks and gravel pits for the trucks to drive through.

Ind 649-5

5. Policy related to view sheds, aesthetics, and community character in the General Plan are ignored. An example is the description of Brunswick Road as a minor arterial ignores the fact it is an entryway into the Brunswick basin and Nevada City. As an entryway it will continue to grow in importance and traffic volume. It represents for many guests to our community the first impression they will have and should not be dismissed because it does not have a scenic designation. We all know the cliché about how difficult it is to alter first impressions. A large part of our economy is derived from tourism, recreation activities, and the Arts. Protecting how we are perceived is critical to our long-term economic success. Over time the section of Highway 174 through Cedar Ridge into Grass Valley will see traffic levels flatten and Brunswick Road will become busier and busier. Caltrans investments and improvements to Highway 174 clearly show the importance of this route into our community and Brunswick Road should be recognized and protected from development that impacts its future success as an entryway and major arterial. This section of the traffic analysis and aesthetics impacts needs to be re-evaluated and reworked.

Ind 649-6

6. The DEIR analysis in each section is poorly organized and fails to describe or explain how proposed mitigation measures would reduce impacts to acceptable levels. The cumulative effect to our community of the negative impacts is poorly analyzed, dismissed, and ignored. Chapter 2, 2.5 Areas of Known Controversy includes 23 bullets to describe the breadth of the negative impacts the project carries with it. Mitigation Measures must be clear, feasible, and achievable. They must show how we can measure and determine the proposed mitigated outcome.

Ind649-7

7. 3.0- "New underground workings would be below 500 feet from ground surface." What about existing workings that are less than 500 feet from the surface? Will these be properly filled and no longer used?

Ind 649-8

8. 4.1-1 "Have a substantial adverse effect on scenic vista" The analysis dismisses the height and massive rock infill that would be several stories high in the current IMM valley and rising above Brunswick Road. In addition to that are the multi-story buildings that require variances because they are more than double the acceptable height of buildings as defined in our General Plan and County regulation. How is this Less than Significant (LS) and how does Not Applicable answer to this Negative Impact? The next item in the table outlines a generic landscape plan that is proposed as a solution. This might be OK for a bank or a Wendy's, but it does not respond to the massive change to the viewshed or the extremely tall buildings.

Ind 649-9

9. 4.1-3 "Create a new source of substantial light and glare which would adversely affect day or night time views in the area." The DEIR designates this LS and mitigations as NA. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly residential. Introducing "substantial" new light and glare into the setting and dismissing the impact is unacceptable.

Ind 649-10

10. 4.3-1 Traffic controls on Highway 174 improvements resulted in 20-30 minutes waiting for the pilot vehicle. If you lived within the project area, one trip could add one hour to your travel time. There needs to be a specific traffic management plan that puts more on the contractor and impacts the traffic flow more efficiently for drivers. Scheduling construction delivery and future trucking to off hours is a good idea. What are the off hours and how is this enforced? The Construction Exhaust Minimization Plan needs to be revealed now as part of the DEIR or specific performance and enforcement standards brought forward. Elements of the plan should not be allowed to be ignored because its inconvenient, costly, or outside the critical path. The project must meet the Federal 8-hours ozone Standard and employ all feasible NOX mitigations to achieve satisfy NSAQMD thresholds. This needs to be spelled out in the EIR.

Ind 649-11

11. 4.3-2 The proposed Asbestos Dust Mitigation Plan should be detailed in the DEIR. This is a large part of the negative impacts the project will have on the neighborhood and the community. The generalized statements offered as mitigation measures are insufficient and potentially ineffective. Previous NSAQMD requirements for similar projects included paving in work areas and automated watering systems as opposed to water trucks and gravel drive through pits. The mitigation should include automated wheel washing technology for all vehicles operating on unpaved surfaces. A spray misting system may be required to subdue harmful dust from project operations. The EIR should describe and include as a mitigation available technology that removes harmful fibers from air exiting the mine. In addition, description of an asbestos monitoring program should be part of the EIR and subject to NSAQMD review.

Ind 649-12

12. I am concerned about adding significant flows to South Fork Wolf Creek. I was a Wolf Creek Alliance stream care volunteer and adding millions of gallons a day would increase erosion and downstream sedimentation. It would challenge wildlife populations that live in the stream zones. Determining the impacts are less than significant (LS) and mitigations are not needed (NA) is foolishness. Plans for special status species, wetland protections, erosion controls, culvert replacement and monitoring program needs to be spelled out in the EIR.

Ind 649-13

13. Given everything we know about Rise Gold's senior leadership and their history in British Columbia, what protections do we have that they will honor agreements and perform professionally. Does Nevada County government have the capacity to inspect, police, enforce, litigate, and control Rise Gold's performance? This maybe outside CEQA analysis, but it is relevant to the detail required in any mitigation or controlling regulation, variance, and oversight agreement.

Ind 649-14

14. Community character is also not specifically analyzed in the CEQA exercise. Yet, community character is at the heart of all the Sections. Nevada County, Grass Valley, Nevada City and Truckee have prospered over the last 40 years. Our down towns are strong and endured economic downturns, Amazon, covid, wildfires, and power outages. New on-line sales revenue sharing regulation is helping to offset the out of town purchasing and sales tax dollar exodus as folks shift spending to on-line. The strength of our economy, based on Economic Resource Council data, is rooted in technology, R&D, seniors, government, tourism, recreation, stewardship, and healthcare. We are perceived as a tourist and recreation destination. Do we want that perception to change to one of an industrial mining town? Mining is our past, not our future.

Ind 649-15

15. 4.3-4 "Result in the inefficient or wasteful use of energy" This is a negative impact and the DEIR finds it LS or less than significant and mitigations as NA (Not Applicable). We live in an era struggling to get our arms around climate change, wild fires, and drought. One element at the heart of this all-encompassing area of study is energy use and carbon footprint. How is it possible that a project that could double the commercial power use in Nevada County be

defined as less than significant? This is wrong and needs new analysis. The Nevada County Climate Action Plan calls for significant energy and carbon reductions. This project must participate in that process.

Ind 649-16

16. 4.3-5 "Conflict with State or local plans for renewable energy or energy efficiency." DEIR designates LS and NA. The Nevada County Energy Action Plan calls for energy and carbon reductions moving forward. The specific language in the Energy Action Plan may be weak and waffle at times it should be specific. However, the intent is there. The goals are there. The Rise Gold IMM project EIR must respect the intent of the local plan and State plans. The EIR must include an energy efficiency plan that shows reducing energy use over the length of the permit. The reductions should be frontloaded. One example of a real mitigation would be to require a portion of the property committed to a solar farm sized to support the project energy use. We require solar infrastructure on new homes, new enterprise must participate in the solution.

Ind 649-17

17. 4.3-7 Carbon Offsets- this family of mitigations should set the standard for what is expected. A mitigation must be CLEAR, FEASIBLE, AND ACHIEVABLE. If the County relies on a future plan or a future action, then the mitigation must identify clear performance standards.

Ind 649-18

18. 4.4-1 ADD- All landscape, habitat mitigations, transplanting, and seed propagation will include weekly monitoring by a qualified biologist to ensure success including the health and prosperity of the plant life. Restoration bonds should be implemented to fund this responsibility for the length of the mining enterprise.

Ind 649-19

19. 4.5-3 Retain a credentialed archeologist to be familiar with the history of the properties and be available to respond in concert with the Sheriff/ Coroner should human remains or Native American artifacts be unearthed. Artifacts would indicate human remains may be in the area.

20. The archeologist will establish contact with the Native American community before the project begins to better understand their wishes should an actionable event occur.

Ind 649-20

21. 4.11-7 NID has not agreed to fully commit an unlimited water supply to Rise Gold's IMM project and potential water service to homes with residential well failures. Rise Gold underestimates the potential for damage to existing and future residential well performance. The LS and NA designations are incorrect.

Ind 649-21

22. 4.12-4 Rise Gold must include pedestrian and bicycle lane improvements along the length of the Brunswick Road and Bennett Street property.

Ind 649-22

23. Alternative #1: The No build option is the correct answer. Develop according to the existing land use designation shown in the County General Plan with consideration for current contemporary planning philosophy that reflects planning ideas not consistent in an older Nevada County General Plan. For instance:

- *Include pedestrian and bike corridors to connect with Grass Valley, Empire Mine, and* Memorial Park.
- Minimize impacts on sensitive habitats and species.
- Require energy efficiency and carbon reduction plans. Require solar farming to reduce dependency on the power grid and energy consumption consistent with the County Energy Action Plan.
- Include open space for animal corridors, visual and scenic integrity.

The DEIR describes the No Project alterative in terms that maximize the development of the Brunswick property. This is not how it would go. This is an amazing important piece of property because of its location in this part of the County at an entryway to the Brunswick Basin. It is located near Empire Mine State Park and Grass Valley. It is flat. **There are many possible uses that would add synergy to the existing thriving local economy that fall within the existing General Plan use designation and are not hard rock mining.** I suggest current thinking of business parks might lean toward mixed use with housing and retail and seek to create a campus environment that is pedestrian friendly. Possible uses that are consistent with a Nevada County economy that has been growing in a sustainable positive direction for at least four decades are: Utilities, Manufacturing, Information, Science & technology, Real Estate, Professional, Arts, Entertainment, and Recreation. All of these would create more jobs, use less energy, have lower carbon footprints, have larger jobs and enterprise building multipliers, and generate more local wealth.

INDIVIDUAL LETTER 649: PAUL SCHWARTZ

This letter is a duplicate of Individual Letter 648. Please see the above responses to Individual Letter 648.

Individual Letter 650

From: Paul Snyder
To: bdofsupervisors
Subject: Vote NO on the Mine
Date: Friday, February 18, 2022 7:54:28 AM

Dist 1

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I implore all the BOS's to vote no on the IM mine!!

Ind 650-1 The past lawsuits and environmental damage left in the wake of Rise Gold in Canada has shown that they can not be trusted to take care of our town. They have repeatedly misrepresented their local support with fake biased "surveys" that also shows they can not be trusted.

Ind 650-2 If you have read the survey's it's so obviously not credible. The drought and water issues are a huge unknown moving forward.

Ind 650-3 We have many abundant resources for tourism that could be jeopardized with the mine. Have you been by the 5 Mile parking during prime biking season? The Pioneer trail , Hoot Trail have been a huge boon for our economy. The new Parliament trail being constructed, and the proposed Pines to Mines and Sugarloaf trails are the direction the county should be going in. I thank you for your support of these projects.

Ind 650-4 Please use best judgement for what is really important to the counties residents and VOTE NO on the mine

Thank You,
Paul Snyder

Ind 650-5 p.s. the recall is a complete joke and a waste of time. Thank your doing your best to keep us safe in uncertain times

INDIVIDUAL LETTER 650: PAUL SNYDER

Response to Comment Ind 650-1
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 650-2
The comment expresses a general opinion that the "surveys" associated with the proposed project lack credibility, but does not provide specific examples that would allow for a detailed response. Please see Master Responses 15 and 16.

Response to Comment Ind 650-3
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2.

Response to Comment Ind 650-4
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 650-5
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 651

From: Paula Strang <pkstrang96@gmail.com>
Sent: Monday, April 4, 2022 3:30 PM
To: Idaho MMEIR
Cc: robertwheatley1099@gmail.com; Karin Huff Wheatley; Georgie; Art Derby; DEIRcomments@cea-nc.org; Kimmie
Subject: Comments on Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report (DEIR)

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Dear Mr. Kelly,

Our family has owned property on Wolf Creek in Nevada County for over **53** years. Four generations of us have enjoyed this beautiful, refreshing waterway. The thought of the Idaho Maryland mine reopening causes serious concern regarding the health of Wolf Creek.

Ind 651-1

The DEIR outlines a water treatment plan that would allow treated mine groundwater to be discharged into South Wolf Creek and thereby Wolf Creek. Mine owners hope to obtain a Limited Threat Discharge Permit from the State Regional Water Quality Control Board, page 3-18, with the treated water covered as Tier 3 discharge, page 4.8-28.

The project anticipates completion of the initial dewatering of the mine in approximately 6 months, pumping at a rate of 2,500 gpm, page 4.8.42. The treated water would be monitored and tested but the owner will only be required to submit quarterly monitoring reports to the State Regional Water Quality Control Board. This is too great a period of time, allowing potential pollutants to wreak havoc on the creek before any governing entity can stop the flows.

I request reporting of the water quality monitoring be done more frequently, such as monthly, to stop potential pollution more quickly.

Ind 651-2

I request that the monitoring be conducted by an independent party.

Lastly, on page 3-18, this statement is made: "The water discharged into South Fork Wolf Creek is expected to be at least as good or better quality than the water typically flowing through South Fork Wolf Creek." I would like to know the basis for this claim.

I ask that the DEIR be revised to address these concerns. Thank you.

Ind 651-3

Respectfully,

Paula Strang

10591 Salcido Lane
Grass Valley, CA 95949
pkstrang96@gmail.com

INDIVIDUAL LETTER 651: PAULA STRANG

Response to Comment Ind 651-1

The commenter states that water quality monitoring for discharges to South Fork Wolf Creek will occur on a quarterly basis. The commenter states this interval period is too long, and pollutants may be discharged to the creek in between reports. The commenter does not state why quarterly monitoring reports under the State's Limited Threat Discharge Permit is inadequate. Water monitoring is conducted under the requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 651-2

The commenter requests that the water monitoring be conducted by an independent party. The Central Valley Regional Water Quality Control Board would specify the location of the sampling, but reports would be submitted by the Project Applicant. (DEIR, p. 4.8-45.) Water monitoring is conducted under the requirements and oversight of the Central Valley Regional Water Quality Control Board. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 651-3

The commenter would like to know how the project's on-site water treatment system would treat water from the mine to be the same quality or better to the existing water in the South Fork Wolf Creek. As shown in Table 3-9 of Appendix K.2, water samples from South Fork Wolf Creek have elevated Iron and Manganese which are above water quality goals. Treated mine water would have lower levels of Iron and Manganese. The County's independent consultant, West Yost, peer reviewed the Water Treatment Plan Design Report and confirmed that the proposed method of treatment would be adequate to successfully treat mine water to comply with Regional Water Board effluent limitations. (DEIR, p. 4.8-41.) The commenter is also referred to Master Response 35 - Discharge to South Fork Wolf Creek.

Individual Letter 652

Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Ave. Suite 170
Nevada City, Ca. 95959

April 2, 2022

Dear Mr. Kelley,

This letter is in response to the notice of a Draft Environmental Impact Report (DEIR) for the Idaho-Maryland Mine Project and to express concerns of restarting 1950's industries in my neighborhood. I am a Grass Valley resident and have been for 26 years I am a dressage horse trainer. I live off Greenhorn Rd, within a mile of the Idaho-Maryland Brunswick site. My husband and I have examined much of the documentation in the DEIR. I have concerns.

Ind 652-1

Climate Change is having a dramatic effect on "average" rainfall. A lower average rainfall will have negative effects on any modeling/analysis results. Climate change is real and it will affect the analysis of expected impacts of mining operations. It must be considered.

However, because the full effect of Climate Change to Nevada County is not yet known and therefore could not have been considered in the DIER (properly)!

Ind 652-2

Chemicals and particulates will disperse somehow and could be harmful to us and live stock (horses)

Ind 652-3

I am concerned about noise pollution due to mining activity and increased truck traffic. (The DEIR indicates that the noise is acceptable according to County regulations. Acceptable to who?
Blasting rock under nearby properties will disrupt normal life functions not to mention the disruption of horse training exercises.

Ind 652-4

Grass Valley has not been a mining town for 70 years. Times have changed! We have developed new residential neighborhoods, new culture, and businesses. In addition, the climate has clearly changed and is changing to the point of no longer sensibly able to support the enormous water demand such a venture dictates. Do not allow this level of industrial operation to restart in Grass Valley especially in a residential neighborhood after all these years.

Sincerely,

Peggy Kelly (530) 274 8819
12748 The Hollow
Grass Valley

peggyrkelly@gmail.com

INDIVIDUAL LETTER 652: PEGGY KELLY

Response to Comment Ind 652-1

This comment is introductory in nature and states that climate change is impacting average rainfall. The comment also states that a lower average rainfall will negatively impact any modeling or analysis associated with the project and must be considered. Lastly, the commenter states that, because the full effect of climate change is unknown, the DEIR could not have considered that full effect.

The DEIR addresses climate change and its impacts to the variability of precipitation in the region. (DEIR, pp. 4.3-11–4.3-19.) The DEIR specifically discusses that long-term changes to precipitation may be no more than 10 to 15 percent of current totals. (DEIR, p. 4.3-16.) Please also see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 652-2

The commenter states that chemical and particles will disperse somehow and could be harmful to people and livestock but provides no further details.

The DEIR discusses impacts to air quality in Chapter 4.3, hazards and hazardous materials in Chapter 4.7, and hydrology and water quality in Chapter 4.8. Please also see Master Response 18 regarding air quality thresholds, Master Response 19 regarding NSAQMD criteria pollutant thresholds during operations, and Master Response 35 regarding the discharge to South Fork Wolf Creek.

Response to Comment Ind 652-3

The commenter is concerned about noise pollution from mining activity and increased truck traffic. The commenter indicates that the DEIR determined that noise produced by the project is acceptable to Nevada County regulations but then questions who would be accepting of the noise levels produced by the project. The commenter also states that blasting associated with the project would disrupt normal life functions and would disrupt horse training exercises.

The DEIR analyzes noise and vibration associated with the project in Chapter 4.10 and traffic impacts in Chapter 4.12. For noise and vibration, the DEIR found that the project would produce a substantial increase in ambient noise levels due to initial potable water pipeline construction activities along East Bennett Road, which are significant and unavoidable. (DEIR, p. 4.10-27.) However, the DEIR found that all other noise-related and vibration-related impacts would be mitigated to less than significant. (see generally DEIR, § 4.10.) The commenter provides no evidence that these conclusions are incorrect with regard to horse training exercises.

Response to Comment Ind 652-4

This comment states that, because of the changing climate, it is not sensible to use water for the project. This comment presumably refers to the project's impacts to groundwater. The DEIR found that the implementation of mitigation measures, specifically a groundwater monitoring plan, well mitigation plan, and requirements to provide an alternative supply of domestic water would mitigate any impacts to groundwater supplies or groundwater recharge to less than significant. (DEIR, p. 4.8-54.)

The comments regarding the general opposition to the project are noted and the commenter is referred to Master Response 1 (Non EIR/Administrative Issues.)

Individual Letter 653

From: Penelope Curtis <penelcurtis@gmail.com>
Sent: Monday, April 4, 2022 11:15 AM
To: Idaho MMEIR; DEIRcomments@cea-nc.org; Heidi Hall
Subject: IMM/DEIR

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To Whom It May Concern:

The critical issue we face right now is a lack of groundwater!!! We have been in a drought period for several years now, with the past 2 being devastating to our environment. Unless you were on vacation in Hawaii for a month in late December and January, you could not have missed the devastation the snowmaggedon caused!

Ind 653-1

You would have to be blind to not see the hundreds of trees that snapped and fell. Why this year? Over the 32 years I have lived here, I have experienced many winters where 3 1/2 feet of snow fell in my yard with little if any damage to the surrounding trees. But this year, like everyone else, the Ponderosa snapped at about 30 feet and Live Oaks came crashing down because the groundwater has become depleted and the trees are sick!!! For years, I recorded about 66 inches of rain annually with much of it coming down in January, February, March and April but this year we have had so little last fall's leaves are still dry and not decomposing into mulch and soil.

We CANNOT afford environmentally to have the Idaho-Maryland Mine reopen! They will first drain the existing underground tunnels which are quite extensive. This will cause underground water throughout the area to be drawn toward the pull of the tunnel's water vacuum. That will mean our already depleted soils will become more depleted with many more trees dying and becoming fuel for the annually occurring wildfires!

Is opening the Idaho-Maryland Mine more important to the County than the health and well-being of our environment under these devastating climate circumstances? Quite frankly I am aghast that the County would even consider re-opening the mine right in the middle of our community with all of the other inherent environmental dangers like noise, mine waste, greenhouse gases, plus creating more toxins to clean up!

Ind 653-2

Please stop this madness and decline the DEIR going forward!

Sincerely,
Penelope Curtis

19486 Tiger Lily Lane
Grass Valley, CA 95945

530.798.5955 (cell)

1

INDIVIDUAL LETTER 653: PENELOPE CURTIS

Response to Comment Ind 653-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 (Non-EIR / Administrative Issues), 15 (Adequacy of Groundwater Monitoring Wells), 16 (Drought and Climate Change), and 33 (Groundwater Dependent Vegetation).

Response to Comment Ind 653-2

Please see Master Responses 1, 8 (Mine Waste Characterization), 9 (Historical Mine Waste at Centennial Site), 16, and 27 (Greenhouse Gas Thresholds). The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 654

Matt Kelley,
Senior planner
Nevada County Planning Department
950 Maidu Avenue
Suite 170
Nevada City, Ca.
95959-7902



cc: Heidi Hall, District 1 Supervisor: Ed Scofield, District 2 Supervisor: Dan Miller, District 3, Supervisor: Sue Hoek District 4 Supervisor: Hardy Bullock , District 5 Supervisor:

Dear Matt Kelley,
Senior planner

I am opposed to opening the Idaho Maryland Mine!

My family and I have lived in Nevada County for forty one years. During that time we have Enjoyed swimming in the river and hiking the many beautiful trails. I, like many other residents of Nevada County, feel very invested here.

Ind 654-1

We were drawn here by its natural beauty and the peacefulness of the environment. During our many years here, we have lamented the destruction of the environment,, in the past by Gold mining. We believed that the time of this destruction was in the past. Now that we know About the health hazards of gold mining, I am hoping that the Idaho Maryland Mine will NOT Be approved.

I am concerned about our air quality, the lowering of the water table in our wells, especially During this time of extreme drought, the safety of explosives during these extreme fire seasons, Wildlife and creek destruction, the noise and pollution from trucks making so many trips a day. We already have toxic air. Do we need to add more dust from the construction of this mine to The air we breathe. We have many elderly, retired people here and children who need the cleanest air possible. The construction of this mine will affect our health adversely. Our property values will decrease. There are, I believe, few factors that mitigate the risks our community will face should this mine be approved.

Ind 654-2

I would like to point out that the Grizzly Hill School STILL has contaminated water and needs to Use an expensive filtration system in order to have drinkable water. This was from the Siskon Mine in the 1990's.

Ind 654-3

Please vote No on opening the Idaho Maryland Mine. Thank you.

Respectfully,
Perissa Busick

Perissa Busick
P.O Box 742,
Nevada City, Ca
95959

INDIVIDUAL LETTER 654: PERISSA BUSICK

Response to Comment Ind 654-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 654-2

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to well impacts and drought, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change. Regarding safety of explosives, please see Chapter 4.7, Hazards and Hazardous Materials. For noise concerns, please see Chapter 4.10, Noise and Vibration. Property value is a subject outside the scope of CEQA – please see Master Response 1.

Response to Comment Ind 654-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 655

From: pete christakes <petec030@gmail.com>
Sent: Sunday, April 3, 2022 7:17 AM
To: Idaho MMEIR
Subject: The mine

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Ind 655-1

Do you ever hear the owls hooting in the morning ? Or watch the stars at night? Or just sit on your patio and listen to the quiet. I do
If the mine opens all that will be gone. Just the truck noise alone 24 hrs a day will be too much.
I moved to grass valley in the early 80s to get away from all the city lights and noise and be in nature.
The impact to the environment will be devastating!
Instead we should be focusing on recreation, boating biking, hiking, sports, and the Tourist trade.

Thanks for your time Pete Christakes

INDIVIDUAL LETTER 655: PETE CHRISTAKES

Response to Comment Ind 655-1

DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 656

From: Pete <yubawaterdog@gmail.com>
Sent: Sunday, April 3, 2022 2:15 PM
To: Idaho MMEIR
Subject: No Mine Please!

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Ind 656-1

Please remember that the mining industry has the worst environmental record of any industry, and that is saying a lot!

Within a half mile of my home are three abandoned mines that the extractors left for others to clean up. There are literally thousands within the state. No matter what they promised up front, they declare bankruptcy and walk away. Literally, they get the gold and somebody else gets the shaft. Let's not let it happen again.

The impact on water, traffic, housing, etc. also means major impacts right away.

Ind 656-2

Economic growth is not a challenge in our region. Maintaining a healthy environment, for both nature and humans while growing, is the challenge.

Please oppose any efforts to open large scale mining in our area.

Thank You,

Peter Arpin
15352 Stonehill Dr.
Nevada City, CA
530-219-5660

1

INDIVIDUAL LETTER 656: PETER ARPIN

Response to Comment Ind 656-1

The comment does not directly address the adequacy of the DEIR. Regarding water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding the general traffic concerns, please see Chapter 4.12, Transportation. Regarding housing, please see the discussions and analyses in Chapter 4.9, Land Use and Population and Housing, of the DEIR.

Response to Comment Ind 656-2

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

From: Peter Brewer
To: bdofsupervisors
Subject: Comments About the Mine
Date: Sunday, January 30, 2022 11:43:28 AM

Dist 1

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Ind 657-1

Why would we want to do this? I am skeptical of the happy talk about the jobs that will be created and the economic benefits to the community. At what cost? If you want to create jobs and bring money into the community, apply yourselves to getting high-speed, fiber-optic Internet to all households. This will bring an influx of highly-educated, well-paid professionals to our area, with no negative environmental impact. Why let our community suffer irreparable environmental damage so a few Canadians can make more money at our expense?

Ind 657-2

Excerpts from an article in The Atlantic, "Is California on the Verge of a Second Gold Rush?" https://apple.news/Aacn6zzlZRDiLtDnwN6WqYA

Rise Gold has pledged to mitigate the environmental impact of its new mining operation in part by employing a technique called "paste backfilling," which involves injecting a mixture of water, mine waste, and a binder (often cement) into mining tunnels. The practice helps provide structural support and reduce the amount of aboveground mine waste. There is some science to support the benefits of this approach, but it's only a partial solution and there are lingering uncertainties about its long-term impact.

Ind 657-3

Mining creates a lot of waste, including the rock that doesn't contain enough gold to extract (called "waste rock") and the slurry left over after gold has been extracted from ore (called "tailings"). Both waste rock and tailings can contain toxic substances that threaten to pollute groundwater and surface waters if not properly mitigated.

Ind 657-4

Grass Valley has been dealing with the fallout of Gold Rush–era mining for decades. Arsenic, which occurs naturally in the gold deposits of the Sierra Nevada foothills, remains an ongoing problem in the area. Old tailings can still leach heavy metals decades after mining operations have ceased. In Grass Valley, the Central Valley Regional

Water Quality Control Board documented high concentrations of arsenic in a pile of tailings nicknamed "the Red Dirt Pile." In 2020, high concentrations of lead, mercury, and arsenic were found in samples taken from a former mine-waste disposal area that now supports approximately four and a half acres of wetland habitat. That disposal area, known as the Centennial site, is owned by a subsidiary of Rise Gold called Rise Grass Valley.

Ind 657-5

The Centennial site was polluted enough to warrant consideration for listing as a federal Superfund site, but Rise Gold avoided federal regulation by agreeing to undertake its own cleanup.

Ind 657-6

Even when rock has little or no heavy metals, disposing of it can be a significant challenge. According to Rise Gold's website, the Idaho-Maryland mining operation historically had to remove a ton of rock for every half ounce of gold it recovered. "These mining companies come along and they want us to not notice that they're going to have a huge amount of mine-waste rock," says Elizabeth Martin, who recently retired as CEO of the Sierra Fund, a local conservation group based in nearby Nevada City. Rise Gold's draft environmental-impact report says the plan will result in approximately 182,500 tons of material produced per year that will need to be transported and then used as engineered fill. By comparison, a large dump truck can carry about 14 tons. Multiply that by more than 10,000, and the visual is "beyond most people's imagination," says Martin.

Ind 657-7

Paste backfilling is widely regarded as a more environmentally friendly way to dispose of mine waste. There is evidence that locking tailings up in cement decreases their permeability and stabilizes any heavy metals within them. There are still questions, though, about whether or not arsenic and heavy metals will stay put in the paste-backfill material over the long term. The leaching behavior of arsenic depends on a lot of different factors, including the binder used in the backfill and the chemical content of the tailings. The biggest unknown is what happens in the future, when the mine closes and the pumps shut down, which will let groundwater flow into the backfilled tunnels. Some studies have noted that even low levels of leaching could continue for years, potentially contaminating drinking water or nearby rivers and streams.

Heavy-metal leaching is high on the list of concerns in Grass Valley. Rise Gold promises that its operations will be clean, but even so, the company's hydrology report does note arsenic leaching from some test samples. The leaching tests, meant to simulate what might happen to a waste-rock pile when it rains, found that arsenic leached from samples of the mineral type serpentinite at concentrations 17 times greater than the water-quality standards.

Ind 657-8

Underground mining operations also intersect with the water table, which means the existing tunnels have to be dewatered, and the water that's pumped out of the tunnels has to be treated before it's released aboveground. "The water coming from these mines that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever."

Ind 657-9

Many conservationists and community opposition groups see gold mining as a battle between nature and greed, and question whether the pursuit of gold is really worth so much environmental destruction.

INDIVIDUAL LETTER 657: PETER BREWER

Response to Comment Ind 657-1
The commenter states that the economic benefits of the project are outweighed by its environmental impacts. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 657-2
The commenter is concerned about the use of cement past backfill (CPB) in the Idaho-Maryland Mine. Please see Response to Comment Ind 14-6.

Response to Comment Ind 657-3
The commenter is concerned about the mining waste containing toxic substances. The commenter is referred to Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 657-4
The commenter states that historic mine tailings can leach arsenic into the environment. The commenter also states that the Centennial Industrial Site is highly contaminated. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 657-5
The commenter states that the Centennial Industrial Site is polluted to the extent that it qualifies as a Superfund site. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 657-6
The commenter implies that, based on the amount of waste rock to be removed from the Idaho-Maryland Mine, the number of trucks necessary to transport the waste rock is unimaginable. The comment does not identify a specific inadequacy with the DEIR and without additional detail, a specific response cannot be provided. Please see Master Response 1.

Response to Comment Ind 657-7
The commenter is concerned about the potential for toxic substances to leach from the CPB. The commenter is referred to Master Response 8 - Mine Waste Characterization.

Response to Comment Ind 657-8
The commenter is concerned that the treated was from the Idaho-Maryland Mine will adversely impact South Fork Wolf Creek. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As stated on page 4.8-51 of the DEIR, after mining is completed, and as underground mine workings fill with groundwater, water from the underground mine workings would begin to seep from the existing drains. The water that would seep from the underground workings is anticipated to have similar water quality to the water that currently discharges from the existing drains. Specifically, it may contain elevated levels of iron and manganese. Therefore, the condition after mining is completed would be similar to existing, or baseline, conditions, such that re-activation of the seeps would not represent a potentially significant impact under CEQA. Although part of the existing environmental setting, some of the seeps have elevated arsenic levels that could pose a threat to human health or the environment. However, despite these existing discharges from the drains, the reported concentrations of all metals and other constituents in the Wolf Creek samples are well below the NPDES water quality standards.



Response to Comment Ind 657-9

The commenter states that some questions whether gold mining is worth the impacts to the environment. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 658

From: peter fromm <moagi1951@gmail.com>
Sent: Sunday, April 3, 2022 1:05 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Draft EIR is Inadequate

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Mr. Matt Kelley

Senior Planner

Nevada County Planning Department

950 Maidu Ave, Ste 170

Nevada City, CA 95959

Dear Mr. Kelley:

The Draft Environmental Impact Report submitted by Rise Gold is inadequate for many reasons, but I will focus on only two: air and water.

Ind 658-1

Toxic Air Contaminants

Asbestos and crystalline silica are two substances which are hazardous when inhaled. They will become airborne when the material containing them is broken

1

or crushed, as will be the case during the mining operation. Table 4.3-3 shows the attainment status of Respirable Particulate Matter (PM10) as NONATTAINMENT.

Ind 658-2

In addition, the only monitoring station for this type of particulate matter is in Yuba City – 31 miles from the mining site. This is totally inadequate. We need better data. Also, how will the grading change once the mine is fully operable? It cannot get better, and I cannot afford to risk my health, and that of my family just so that a foreign company can turn a profit.

Water

According to recent studies, the current mega draught is the worst in 1200 years!!! It should be obvious, but during a draught, water levels in lakes, streams, reservoirs and aquifers goes down. In addition, the DEIR states that MILLIONS of gallons of water per day will be removed from the mine.

Ind 658-3

When that happens, more water will backfill whatever is pumped out. And the source of that backfill will be the aquifers which feed our local wells.

If our aquifers are threatened, each affected homeowner will need make other arrangements (i.e. NID). I checked with them to determine the cost and timeframe required to connect to their system. As it turns out, the cost is exorbitant. In my case, approximately $150,000. And after that, I will have the opportunity to pay for something which is currently essentially free.

So all the affected well owners are asked to subsidize this environmentally destructive operation.

Under section 4.8-2(b), the DEIR states: "If, based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10

2

percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are significantly impacted, and if necessary, providing an ***immediate*** water supply until the source of the problem is determined and rectified."

Ind 658-4

The DEIR does not include a definition of the word ***immediate***. I believe that their definition and mine do not agree. What happens if my well runs dry? When will someone come out to my house to investigate and remediate the situation? How long will that process take? How can anyone live without water? If this process takes more than a few days (or if the project applicant disputes their culpability in the loss of water), where are we then? Obviously, we will not be able to occupy (or sell) our home.

Due to the above, as well as all the other hazards and destruction outlined in the DEIR, I'm hopeful that the planning department and the Board of Supervisors will compel Rise Gold to revise this totally inadequate report.

Ind 658-5

Thanks for your consideration,

Peter Fromm

14006 Liquidambar Lane

Grass Valley, CA 95945

Moagi1951@gmail.com

INDIVIDUAL LETTER 658: PETER FROMM

Response to Comment Ind 658-1

The commenter states that the project will result in the release of toxic air contaminants, namely asbestos and crystalline silica, but does not state how the DEIR is inadequate. Chapter 4.3 of the DEIR analyzed asbestos and crystalline silica emissions from the project and found the associated impacts to be less than significant after mitigation. (DEIR, p. 4.3-82.) The commenter is referred to Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 658-2

The commenter states that the ambient air pollutant monitoring stations and data provided in the DEIR are not representative of the project site. The commenter does not suggest any stations that would have data more representative of the project site. Of note, the ambient data included in Table 2 in Appendix E.1 of the DEIR, and summarized in Table 4.3-4 of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, are provided as context for the existing local ambient air quality. Significance determinations, however, are based on comparison to the NSAQMD thresholds. As discussed on page 4.3-41 of the DEIR, the NSAQMD established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions, which were developed based on compliance with the applicable AAQS. Regarding emissions quantification, the DEIR employed industry standard and vetted approaches and quantification equations, such as factors developed by the United States Environmental Protection Agency (EPA) in the AP-42 Compilation of Air Emissions Factors and by the California Air Resources Board (CARB) in the OFFROAD and EMFAC models. The assumptions and factors incorporated in the analysis are detailed in "Method of Analysis" section of Chapter 4.3 of the DEIR, starting on page 4.3-44.

Response to Comment Ind 658-3

The commenter is concerned that the dewatering of the mine will have adverse impacts to groundwater supplies. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 658-4

The commenter is states that the DEIR does not define the word "immediate" in the context of the Project Applicant providing water supply in the event that the dewatering of the mine impacts groundwater wells. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 658-5

The commenter states that, due to the above, and the other "hazards and destruction" outlined in the DEIR, the commenter urges the County to revise the DEIR. The comment is noted for the decisionmakers.

Individual Letter 659

From: Peter Stevenson
To: BOS Public Comment
Subject: Rise Gold Mine
Date: Monday, February 28, 2022 6:53:07 AM

Dist 5

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Ind 659-1

If you value in any way the quality of life in Nevada County you must not approve Rise's application. Peter Stevenson 12481 Palmer Road, Nevada City, 95959
(510) 793-9569

Sent from my iPad

INDIVIDUAL LETTER 659: PETER STEVENSON

Response to Comment Ind 659-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project and quality of life concerns, which are outside the scope of CEQA. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 660

From: Peter Stevenson <ps98212@gmail.com>
Sent: Monday, April 4, 2022 7:46 AM
To: Idaho MMEIR
Subject: Traffic impacts

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Ind 660-1

I am not sure why it is that county supervisors frequently fail to consider traffic impacts before approving projects especially considering the unusual and minimally engineered traffic corridors in this county. The Idaho Maryland/49 corridor is already accident prone and congested without adding the impacts that the mine operation will have. I am hoping that you will not approve their application. Peter Stevenson, 12481 Palmer Road, Nevada City, 95959 (510) 793-9569

Sent from my iPad

INDIVIDUAL LETTER 660: PETER STEVENSON

Response to Comment Ind 660-1

The comment does not directly address the adequacy of the DEIR. Please refer to Chapter 4.12, Transportation, of the DEIR for a detailed traffic analysis, including the Brunswick Road segment raised by the commenter. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 661

From: Rachael Elam
To: Idaho MMEIR
Subject: Against reopening of mine
Date: Monday, April 4, 2022 5:05:00 PM

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Ind 661-1

Hello,
As a resident of Nevada county for a decade and as an employee who works less than a mile from the site of the mine, I would like to express my dissent over the reopening of the mine. Reasons include environmental impacts related to noise, water, air, and ground pollution. I also feel that the increase in job creation does not outweigh the negative consequences our town will suffer if the mine reopens.

Warmest Regards,
Rachael Elam
530-913-3119
Cascade Shores, NVC

INDIVIDUAL LETTER 661: RACHAEL ELAM

Response to Comment Ind 661-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For noise concerns, please see Chapter 4.10, Noise and Vibration. Regarding ground pollution, please see Chapter 4.7, Hazards and Hazardous Materials and Master Response 8 – Mine Waste Characterization.

Individual Letter 662

From: Rachel
To: bdofsupervisors
Subject: I oppose the mine
Date: Sunday, January 30, 2022 9:17:04 AM

Dist 1

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Hi Heidi,

Ind 662-1 Thank you so much for checking on me and offering help during our 2 week power outage. I hope your new year is off to a great start.

I am writing to you as your constituent to express my opposition to Rise Gold reopening the mine.

Ind 662-2 I am opposed to reopening based on water usage. At a time when there are signs on the sidewalks in downtown Nevada City about restricting water usage, I can't fathom why we would entertain a business that will waste and contaminate an astronomical amount of water in our community. To me, this detrimental impact outweighs all other factors.

The mine will use 1.2 million gallons a day every day after pumping 815 million gallons of water to begin mining. The mine will contaminate this water. The mine's usage of and contamination of water are facts. The mine's ability to clean the water after is irrelevant to my opposition.

Ind 662-3 As a colleague wrote, "ongoing noise and possible loss of wells and lower property values, and those living along routes to be travelled by trucks hauling tailings at all hours, have to be considered first and foremost."

This article further cemented my opposition to Rise Gold reopening the mine. I thought it would be of interest:

Ind 662-4 Is California on the Verge of a Second Gold Rush?
https://www.theatlantic.com/science/archive/2022/01/gold-mines-reopening-california/621403/

Sincerely, Rachel
Resident in district 1

INDIVIDUAL LETTER 662: RACHEL

Response to Comment Ind 662-1
The comment does not address the adequacy of the DEIR. Please see responses to more specific comments below.

Response to Comment Ind 662-2
The commenter opposes the mine's use of water, which is noted for the record and forwarded to the decisionmakers. The commenter also states that the mine's contamination of water is a fact. The particular concern is unclear as the mine would pump existing groundwater from the underground workings of the mine and treat this water at an on-site water treatment plant, permitted by the State, prior to discharging the treated water into South Fork Wolf Creek. Please see Master Response 35 (Discharge to South Fork Wolf Creek) for further details.

Response to Comment Ind 662-3
DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 has been required to reduce this impact to a less than significant level. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value is outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 662-4
The comment does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 663

From: Ralph
To: bdofsupervisors
Subject: Rise Reported County determinations on the Idaho-Maryland Mine
Date: Tuesday, February 22, 2022 10:25:57 AM
Attachments: RiseGoldLetterToWellOwners_Feb2022.pdf
ConcernsAboutRiseGoldMailers_Feb22.pdf

Dist 3

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Dear Supervisors

Ind 663-1 As you may be aware, Idaho-Maryland Mine owner Rise Gold Corp has sent out yet another mailer to Nevada County residents, this time claiming that "Nevada County has just completed the most thorough environmental study in its history," along with numerous unresolved claims about the project. The mailer includes a form for supporters to mail in to Rise Gold.

We want to bring your attention to another letter that was sent to well owners in the mine area. (Copy included)

Ind 663-2 The letter states: "**The County has determined** that no domestic water wells will be drained by mine dewatering," that "**The County has determined**, using a safety factor of 100%, that several wells...could be impacted...to a maximum of 10 feet," and "**The County has determined** that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project."

We feel that it would serve the public interest for the County to issue a clarifying statement regarding the status of the Draft EIR and the status of determinations by the County.

Ind 663-3 Thank you.
Sincerely,
Ralph

Ralph Silberstein, President
CEA Foundation
ralph@cea-nc.org
ralphasil@gmail.com
530 277 2039 (c)

Rise Grass Valley Inc.
333 Crown Pt Circle, Ste 215
Grass Valley, CA 95945 USA

February 11th, 2022

[redacted]
Grass Valley, CA 95945

Mr. [redacted],

The Idaho-Maryland Mine Project proposes reopening the Idaho-Maryland underground mine with facilities constructed on the Brunswick Industrial site located south-west of the Brunswick Road and E. Bennett Road intersection. Nevada County has recently issued (January 4th, 2022) a Draft Environmental Impact Report (the "DEIR") for the Idaho-Maryland Mine Project. Rise has reviewed this document in detail over the last month and we are reaching out to you to provide further information on our project.

Rise Grass Valley Inc. (Rise) is the owner of the mineral rights, starting 200 feet and deeper beneath your surface property including all necessary and convenient rights to extract them, excepting the right of entry to the surface land. To access its mineral estate, Rise must first dewater the underground mine, and because your property is on a well, extensive research and modeling by certified, licensed hydrogeologists took place to assure us, the County and you how your well might be affected. While Rise does own the mineral rights deeper than 200 feet below the surface, Rise respects your surface property rights and is committed to being a good neighbor and community member. Out of an abundance of caution, Rise plans to provide you the option to connect to NID water at Rise's expense.

The hydrogeologic analysis was peer-reviewed by an independent California-licensed hydrogeologist. The County has determined that no domestic water wells will be drained by mine dewatering. The County has determined, using a safety factor of 100%, that several wells in the East Bennet Road area could be impacted by a reduction in the water column of wells ranging to a maximum of 10 feet. It should be noted that the water level in the existing mine workings is already approximately 100 feet below the depth of groundwater in your area, which illustrates that the mine is not hydrologically connected by significant fractures to the shallower groundwater well due to the impervious nature of the surrounding rock. Nevertheless, to ensure that you have 100% confidence in an uninterrupted access to water, Rise has committed to construct, at its own cost, an extension of the Nevada Irrigation District (NID) potable water system along E. Bennett Road which could service your property if you choose. This construction and connection would take place before any mine dewatering commences. Thus, you will have the option of either connecting to NID water, at Rise's cost, and/or continuing to use your domestic well. The County has determined that there is no threat to water quality to domestic water wells from the Idaho-Maryland Mine Project. Water does not flow upward from the mine

workings to feed your well, and as the water in the mine workings is removed, that would continue to be the case.

If you decide to utilize NID potable water, Rise will fund the connection to your property. The value per property owner, including capacity charges, is estimated at approximately $85,000. Rise would also pay for your ongoing water charges as long as you own your property. A high-quality water supply from NID would alleviate your ongoing treatment and monitoring of your current well. In addition, this water supply is reliable and not interrupted during our area's increasingly frequent power outages.

If requested by the landowner at the time of NID connection and service to their properties, Rise will pay to close property owners' wells using certified well drillers and under Nevada County regulations.

If the Nevada Board of Supervisors approves the project, we will proceed with the detailed design of the potable water line. We will consult with you about your preference in meter location and desire to connect to the NID potable water system.

The Idaho-Maryland Mine Project also has direct benefits to fire protection for your property. The extension of the water pipeline along E. Bennett Road will allow for installing of fire hydrants and allow firefighters to respond to fires in your area much more efficiently. Rise has also agreed to provide Ophir Hill Fire Protection District with a new fire engine and additional firefighters which will significantly enhance their ability to provide excellent service in your area.

Your property is over 1/2 of a mile away from the Brunswick site, and it would not be impacted by noise during operations. Rise will not route truck traffic along E. Bennett Road adjacent to your property. Technical analysis, performed by an expert PhD, shows that the anticipated vibrations from drilling and blasting underground are negligible, and in almost all situations, drilling and blasting will be unnoticeable and undetectable.

Rise recently engaged RCLCO Real Estate Consulting, a highly respected firm, on the potential effect of the Idaho-Maryland Mine Project on local real estate values in the local area. RCLCO found no negative impact on home prices based upon case studies or recently opened mines. However, due to demand created by employment, homes sold closer to a mine actually achieve higher pricing than those sold farther away. We believe the extension of NID water service will increase the value of your property, as will the economic impact of the 300+ high-paying jobs and approximately 300 indirect jobs that the project will create.

You can learn more about the Idaho-Maryland Mine Project at www.risegrassvalley.com and our company at www.risegoldcorp.com. If you are interested in more information, have any concerns, or wish to support our project please contact me and I would be pleased to arrange a

meeting in our Grass Valley office or at the Brunswick site. If you would like to meet in person or speak further about our project and the proposed NID water service, please contact me by phone or email as below.

Sincerely,

Ben Mossman
President, Rise Grass Valley, Inc.
CEO, Rise Gold Corp.
(530) 433-0188
info@risegoldcorp.com

INDIVIDUAL LETTER 663: RALPH SILBERSTEIN

Response to Comment Ind 663-1

The commenter references a letter sent out by the applicant, which is included as an attachment. The applicant's dissemination of materials to the community is irrelevant to the County's independent and objective DEIR process. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 663-2

The commenter references language in the attachment regarding the lack of well impacts associated with the project. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, which accurately presents the findings of the DEIR regarding well impacts.

Response to Comment Ind 663-3

The DEIR and this Final EIR accurately present the County's findings with respect to the environmental review of the proposed project. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 664

To: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
(530) 265-1423

From: Ray Bryars. 11574 Northview Drive, Nevada City, CA 95059
Email: raybryars@yahoo.com

Subject : Questions & Comments related to the Idaho-Maryland Mine Project DEIR

Date: 3/30/2022

Via email:Idaho.MMEIR@co.nevada.ca.us

Dear Matt

Ind 664-1 I have reviewed section 4.7 - Hazards and Hazardous Materials section of the DEIR and was shocked at how they could possibly conclude that there are "No Significant issues". These are explosives materials and chemicals, they are addressing, how could there not be significant issues?

Ind 664-2

Nearest Airports (page 4.7-10)
Nevada County Airpark is only 4000 feet from the proposed Brunswick Industrial Site, with planes flying over on a regular basis.

It notes that the Nevada County Air Park is a "small aircraft airport" this is a disgraceful misleading statement that demeans the importance of the airport to protecting a number of communities. This airport is critical for the CALFIRE Grass Valley Air Attack Base. It is the permanent base for two Grumman S-2 Air Tankers that drop fire retardent, along with two Air Attack aircraft that coordinate the efforts of the Tankers. These planes protect a large portion of Nevada and adjacent counties during fire season. If anything were to happen to impede the ability of these and other firefighting planes to take off and land during critical firefighting periods, there could be horrendous impacts to our infrastructure and to the lives of many residents, businesses, employees and visitors. The airport is vital to the safety, vitality and future of Nevada County.
Question: Why would Rise Gold blatantly Lie about the value of the airport?
Question: How could the danger to this valuable asset ever be mitigated?
Question: Doesn't there need be special notification to pilots about the location of the mine and the possibility of emissions, explosions, plumes of air that might cause turbulence?
Question: When transportation of explosives is occurring within the flightpath, shouldn't all flights be stopped?
Question: Since the airport is crucial to the safety of our community during the fire season, shouldn't all transport of explosives be banned during fire season?

Ind 664-3

Emergency Response and Evacuation (Page 4.7-10)
This section discusses guidance for evacuation orders, warnings, etc.
Question: Will law enforcement be fully trained to respond to explosions?
Question: What if an explosion levels the buildings and cuts off any ability to contact law enforcement. How will the neighboring residents and businesses know what to do?
Question: Will all neighbors within a possibly impacted area be notified that they are living close to a site that is using dangerous explosives?
Question: Will the properties in the danger zones be provided with compensation for the danger that they will constantly be exposed to?
Question: Will the property owners in the danger zones be provided with compensation for the reduced value of their properties?
Question: Will property taxes be reduced for properties that are close to the Brunswick location where the explosives will be used?
Question: Will anyone proposing to purchase or sell a property within an area that could be impacted by explosions or hazardous materials be notified of the dangers?

Ind 664-4

On page 4.7-11 It mentions that the Greenhorn Road area would likely have several Zone Haven zones because it is a relatively large area.
Question: Are there any other areas in Nevada County that have or will have Zone Haven zones due to their proximity to the hazardous materials at the mine site?

Ind 664-5

Section 4.7.3
Occupational Safety and Health Act (page 4.7-12)
There is discussion about the training requirements.
Question: Can it be assured that all personnel will be adequately trained prior to any hazardous materials being brought to the site?

Ind 664-6

Question: Is the County able to ensure that the proper training takes place?
Question: Is the County adequately staffed to be able to monitor and enforce adherence to a Hazardous Materials safety program?
Question: Will the applicant be required to provide a detailed project timeline that included critical safety milestones, prior to any approval for the project to be started?
Question: Is the County Building Department able to verify that any buildings meet appropriate hazardous materials construction requirements?

Ind 664-7

Question: Who will pay for all the regulatory costs associated with transporting, handling and housing hazardous materials?
Question: Given the size of this project and the proposed 80 year operation. Will there be any costs to the County that taxpayers will need to cover?

Ind 664-8

Question: What steps will be taken to ensure that the Brunswick Mine site will not become a toxic waste site like the Centennial Site?

Ind 664-9

Question: Will a very large Security Bond be required to ensure that the applicant will not run off and or declare bankruptcy if there are problems? Please note there is a history of the applicant doing exactly this in Canada.
Question: If there is an explosion and hazardous materials are spread to surrounding neighborhoods, who will pay for the cleanup costs? Who will pay for inconvenience and housing for residents while the properties are cleaned up? Who would be liable if heaven forbid, someone is killed or injured?

Ind 664-10

Nevada County General Plan (page 4.7-17)
This section is misleading. It makes it appear that adding hazardous substances into the community fits into the General Plan. No it doesn't - The General Plan does not, nor should it, add more hazards to our community. This is very sleazy!
Question: If there is a hazardous waste cleanup situation caused by the mine in Nevada County, who pays for it?
Question: Why would the County approve any project that would present a hazardous waste cleanup risk?
Question: Given that any hazardous situation could result in road closures or flight cancellations. Who would pay for the cost to businesses and residents?

Ind 664-11

Policy HM-10.5.5 states that The County will actively promote clean-up or remediation of properties contaminated by mine waste or other hazardous materials .....
Question: If this is the case then why do we still have numerous BrownField sites in Nevada County?
Question: Since there are numerous BrownField sites related to mining, that have not been remediated, why are we even thinking about approving another potential disaster site? Let's make it a County Policy not to approve any mine until all Brownfield sites are remediated.

Ind 664-12

Nevada County Environmental Health Department (NCEHD) (page 4.7-18)
It discusses that the NCEHD is (amongst other things) responsible for implementing the hazardous materials storage, hazardous materials management plans and risk management plans.
Question: Is the Health Department staffed and trained to handle the huge risks of thousands of pounds of explosives being moved into and stored in our community?
Question: Does the Health Department have the budget to handle these additional responsibilities?

Ind 664-13

Nevada County Emergency Operations Plan (EOP) (page 4.7-18)
It refers to the EOP that delineates responsibilities of first responders (fire and Law) and other response support organizations. It discusses evacuation plans that would be needed as well as Standardized Emergency Management Systems (SEMS) and Comprehensive Preparedness Guidelines (CPG).
Question: How many other businesses require a reference to an EOP or SEMS or CPG?
Question: Does the community want or deserve to have a business that has to reference an EOP, an SEMS or a CPG? The Mine site could be used for many other businesses, organizations or activities that are of benefit to the community - Not one that brings the need for Emergency Operations Plans.

Ind 664-14

Section 4.7.4 (note number appears out of sequence) Impacts and Mitigation Measures (page 4.7-19)

Standards of Significance (page 4.7-19)
In accordance with CEGA Guidelines Appendix G, and impact is considered significant if the proposed project would:

Then there is a bullet item list of areas that are considered significant. each of the issues should be enough to deny the project. I will list only one:

- "This includes: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or or public use airport, would the project result in a safety, hazard or excessive noise for people residing or working in the project area."

Question: With the Nevada County Airport less than 2 miles from the Brunswick site. This is obviously a SIGNIFICANT issue that cannot be remediated. Shouldn't this alone require the DEIR to be updated or completely stop the project?
Question: After this list the DEIR says nothing to deny that all items are SIGNIFICANT, the paragraphs following the list totally ignore the list and make no effort to discuss mitigation. Shouldn't this require the applicant to completely revise the DEIR to address how to mitigate each issue?

Section 4.7-1 (page 4.7-22)
Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials. Based on the analysis below, with implementation of mitigation, the impact related to the transpiration, storage and use of hazardous materials is considered less than significant.

Ind 664-15

Question: This contradicts the conclusion on page 4.7-31 which states "it is conservatively concluded that the proposed project could result in a **significant** impact to the routing transport, storage and use of explosives. Why the discrepancy?
Question: Why doesn't this shut down the whole project?
Question: The transportation route is not spelled out. Shouldn't the property owners along the route be specifically notified and given the opportunity to voice their concerns?
Question: Why should the County approve a project that could impact the safety of the residents?

Section 4.7-1 (page 4.7-22)
Explosives (page 4.7-23)
In table 4.7-1 it lists a number of types of explosives some of which need to be transported and stored separately. It is obvious that the management of these explosives is a non-trivial task that will require highly qualified staff 24/7/365. It is extremely important since this is a highly technical, highly detailed duty that will require much oversight.

Ind 664-16

Question: To ensure safety in the community, shouldn't the details of this process and the staffing qualifications be spelled out for review, prior to any approvals by the Supervisors?
Question: Shouldn't the details of the training requirements for anyone handling explosives be spelled out?
Question: Shouldn't the details of the oversight of the explosives storage be spelled out?
Question: Why is there no reference to the "AMERICAN TABLE OF DISTANCES FOR STORAGE OF EXPLOSIVES AS APPROVED BY THE INSTITUTE OF MAKERS OF EXPLOSIVES AND REVISED JUNE 1991"? This should be used as the Bible for explosive storage and distances from Public Highways. Distances from Brunswick Road and East Bennet Street should be spelled out.
Question: Shouldn't the training of local emergency responders to a situation regarding hazardous materials be spelled out?
Question: Shouldn't staffing requirements of 24/7/365 for local fire departments, hospitals, etc be spelled out?

Ind 664-17

Question: The current Brunswick sites is not securely fenced. I have seen people casually breach the fencing a number of times. Will the fencing and perimeter security be spelled out in

detail and will the ability to maintain a high level of security 24/7/365 for 80 years be a requirement?
Question: Will the applicant's ability to fund and maintain a high level of security for 80 years, be determined prior to any thought of allowing this project to move forward?
Question: Will a very large bond be required along with annual compliance requirements that allow for complete closure of the site if there are any serious non-compliance issues?

Explosive Storage
On page 4.7-28 it specifies that "no mining is proposed closer than 500 feet to surface; thus explosives in transit would be at least this far from the surface." This is a ridiculous statement since the explosives have to be in transit from wherever they are manufactured to Grass Valley and then once at the mine site, they would be in transit to the 500 foot level.
Question: Why is Rise Gold making these obviously misleading statements? Explosives will be required for construction of a new axes shaft, reclamation of existing mine works and development of storage areas, etc. Doesn't the omission of details indicate that there is a SIGNIFICANT impact that can't be mitigated?

Ind 664-18

Question: Where will explosives and other hazardous materials be stored prior to transit to the 500 feet from the surface level?

On page 4.7-27 it specifies that no mining is proposed closer than 500 feet from the surface; thus explosives in transit would be at least this far from the surface. Again, a ridiculous statement. At this point it is not known what impediments will be found in the mineshaft. It has been decades since anyone has been into the mine, so there could be huge blockages that will require explosives to blast through.
Question: Why is Rise Gold giving misleading information? Can they guarantee that no explosives will ever be used above 500 feet below ground level?

****Proximity to roads**
The American Table of Distances for Storage of Explosives as approved by the institute of makers of explosives and revised June 1991. Spells out the distances explosive materials should be from public highways.
Question: Will this be adhered to and will there be extra precautions required due to the proximity of Brunswick Road and East Bennet to the areas where explosives will be stored?

Ind 664-19

Explosive Transport **(page 4.7-24)**
On page 4.2-24 it states that Hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49……
Question: Exactly what are the details of the routes that the explosives take on the way to the Mine? Will this be through business districts or residential areas? What security will there be? We have all been made aware of catastrophic explosions caused by the same explosives that Rise Gold intends to use. These explosions have caused the death of thousands of people and obliterated hundreds of homes.
Question: This route is extremely close to the Nevada County Airport? Will there be restrictions to flights during explosives transport?
Question: What will happen during fire season when planes need to rapidly access the airport to protect the community?
Question: Will Rise Gold be required to post a multi-million dollar bond in case something goes wrong?
If the answer is no. Why not?

Ind 664-20

Question: If there is an explosion, will trained resources be available to communicate with the community and evacuate residents as required? It is well know that along Sutton Way, close to Idaho-Maryland Road, there are senior care facilities that would require a massive evacuation response.
Question: Will trained personnel be available 24/7 to take care of these people in an emergency?

On page 4.7-23 It states that :" The handler or an employee authorized representative agent, or designee of the handler shall provide all state, city or county response personnel with access to the handler's facilities. In the case of the proposed project the contractors are required to notify the NCEHD (Nevada County Environmental Health Department) in the event of an accidental release of a hazardous material, who would then monitor the conditions and completion of remediation measures."

Ind 664-21

Questions: Where are the handler's facilities? Is this the mine? If there is an explosion or hazardous release on Brunswick Road or in the Glenbrook Basin, what steps would be taken to evacuate hundreds of people? Will the NCEHD be staffed to respond 24/7/365 for 80 years, if there were an emergency? What training does the NCEHD have for handling explosives? Will there be trained personnel available 24/7/365/80 to respond to incidents?
Question: Are there plans to train NCEHD personnel for explosive related incidents? When will training take place and at what intervals?

On page 4.7-26 there is reference to a maximum of 28,000 pounds of explosives would be stored underground at any given time. Prior to that statement it specifies that 0.93 tons of explosives would be used each day. Since there are 2000 pounds in a ton, that infers that the explosives would need to be replaced approximately every 15 days. This means that a truck carrying 28000 pounds of explosives would be taking the off ramp from Highway 20/49 at Brunswick Road and driving through very heavily used intersections on the way to the Brunswick site. This would occur throughout the year, which means possible transportation through wind, rain or snow conditions, not to mention the very high probability of traffic accidents over time. If there is another transit route, it should be spelled out.
Question: The two Intersections along Brunswick at Idaho Maryland Road and Loma Rica Drive are extremely close (less than 1/2 mile) to the Nevada County Airport. Should a valuable asset like the airport be subject to these explosion risks? There was a recent fatal accident close to Loma Rica Drive. What would happen if explosives were involved?

Ind 664-22

Question: Is the developer of the Loma Rica housing project aware of the possibility that explosives will possibly be be transported along Brunswick Road, past the development?
Question: Can it be confirmed that the developer will be required to disclose details of the hazards of the mine and transport of hazardous materials to potential property owners?
Question: Will the developer of the Loma Rica housing project be required to notify property owners of the probability that explosives will be used under their homes?
Question: Will all Realtors be required to notify all potential buyers of property above or within a mile of the mine be required to disclose that explosives will be transported close to their homes and potentially used under their homes?
Question: Does it make sense to be transporting huge amounts of explosives, causing a community like Grass Valley to be subject to the risks of the huge explosive damage that Ammonium Nitrate can cause? We see situations almost weekly where large communities have been evacuated due to the threat of explosions. Recently there was an uncontrolled fire in a North Carolina fertilizer plant. Is this a risk that our community deserves?

On Page 4.7-28 it states that "Blasting activities are proposed to take place twice daily with blasting between shifts at 7AM and 7PM ....."
Question: Will the property owners of the new Loma Rica Housing Development be made aware of these blasting activities? The explosions could be directly below hundreds of properties.
Question: Will current property owners on Sutton Way be notified of these blasting activities? There are people with fragile health conditions in some of the health facilities in this area. The blasting may impact their health.

Conclusion (page 4.7-30)
It states that: "compliance with applicable federal, State and local regulations would "minimize" the potential for the proposed project to result in a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials."

Ind 664-23

Question: Why would the county knowingly subject its residents to ANY risk? We all know that humans make mistakes and accidents happen. If this project is approved it is almost a certainty that a disaster will happen. We have examples almost every week of explosions with the chemicals that are proposed for use at this site. Recently an Ammonium Nitrate plant in North Carolina burned out of control for a 3rd day, 6000 people were evacuated and it is projected to be one of the worst explosions in US history. Does Nevada County need to take a similar risk? I urge you to say NO.

Then on page 4.7-31 it states "It is conservatively concluded that the proposed project could result in a **significant** impact related to the routine transport, storage and use of explosives."
Question: Why should the community of Grass Valley subject its residents to these risks? It makes no sense, for any period of time, let alone the proposed 80 years?
Question: Why do previous sections conclude that "there is no significant risk" this is disgracefully misleading.

Mitigation Measures (page 4.7-31)

Ind 664-24

States that "The mine operator shall prepare a Risk Assessment when the underground mine is accessible..... The Risk Assessment shall be performed by a qualified professional .....The Risk Assessment shall demonstrate protection of the public from hazards of explosive storage and be provided too the Nevada County Planning Department before underground storage of explosives.
Question: Does the Planning Department have the staff and the expertise to address safety issues with explosives? If not who does?
Question: What is the timeframe for the Risk Assessment? Shouldn't this be part of the DEIR?

Ind 664-25

Page 4.7-31, 4.7-1(c) The mine operator ..... Proof of the agreement between ..... Shall be provided to the Nevada County Planning Department before transporting explosives to the site.

Question: Does the Planning Department have the staff and the expertise to address explosive transportation issues? If not who does?

Page 4.7-31, 4.7-1(d) Prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site.

Ind 664-26

Question: Is there anyone with the experience and expertise on County Staff who could do this? If not, what is required to hire and retain staff with the appropriate skills?
Question: Shouldn't the Hazardous Materials Business Plan be part of the DEIR?
Question: Who will pay for the costs associated with this?

Cumulative Impacts And Mitigation Measures (page 4.7-39)
Section 4.7-5
Page 4.7-39 it states:
"In general, hazardous materials and other public health and safety issues are site specific and project specific and would not be significantly affected by other developments within the project area."
Question: How is this possible when on page 4.7-31 it states "It is conservatively concluded that the proposed project could result in a **significant** impact related to the routine transport, storage and use of explosives." They are contradicting their own statements.
Also on page 4.7-39 it states:
"this EIR concludes that compliance with applicable federal and state regulations, such as MSHA, OSHA, and CCR, as set forth in Mitigation Measures 4.7-1 (a-d), would ensure that the explosive hazards associated with the ongoing operation of the proposed project should not combine with other cumulative projects to create significant related hazard impacts, and the cumulative impact would be **less than significant.**

Ind 664-27

Question: Shouldn't the compliance process be documented in detail to show all the interacting agencies and how they interface with the employees of the mining company? Details should show the costs to each organization and who is responsible for the costs. If any of these costs are carried by the County or any residents in the county, this should be clearly specified so that those responsible for allowing this project to move forward are made fully aware of who is really paying the bill.
Question: Is there an agency in County Government responsible for vetting the track record of anyone proposing to reopen a mine to ensure that reasonable attempts have been made to protect the residents from another Siskon Mine, Magenta Drain or Lava Cap Brownfields site problem?
Question: How can any of the statements in this DEIR be trusted until the applicant has been vetted?

INDIVIDUAL LETTER 664: RAY BRYARS

Response to Comment Ind 664-1

The commenter disagrees with the DEIR's findings that the impacts discussed in Chapter 4.7 pertaining to hazardous materials could be mitigated to less than significant. The commenter does not specifically state how the DEIR is inadequate. Section 4.7.4 of the DEIR describes the standards of significance and methodology used to analyze and determine the project's potential impacts related to hazards and hazardous materials. As discussed in Section 4.7-1 on pages 4.7-22 through 4.7-31 of the DEIR, with implementation of mitigation, the impact related to transportation, storage. and use of hazardous materials is considered less than significant. As discussed in this section of the DEIR, the transportation of explosives is heavily regulated and the transportation of explosives in the United States has an excellent safety record. Transportation, storage, and use of explosives used in furtherance of the project would be required to comply with applicable federal and State laws at all times. Compliance with such would help to ensure that a significant hazard to the public or the environment through the routine transport, use, or disposal of explosives would not occur. The commenter is also referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 664-2

The commenter states that the project will impede the operations of the nearby Nevada County Airport but does not provide specific reasons as to how the DEIR is inadequate in this regard. Page 4.7-10 of the DEIR discusses the Nevada County Air Park, a small aircraft airport, located less than one mile from the Brunswick Industrial site. The commenter is offended by the description of the airpark as a "small aircraft airport" but provides no information on how this description is related to the adequacy of the DEIR. Information on the Grass Valley Air Attack Base is provided on page 4.13-8 of the DEIR. Furthermore, the Nevada County Airport has a single runway that is aligned east to west. The runway is 4,350-feet long and 75 feet wide and designated as Runway 7-25. The Airport Reference Code (ARC) classification for the airport is ARC B-I (Small). This means the airport is used primarily by aircraft with approach speeds lower than 121 knots, wingspans less than 49 feet, and weighs less than 12,500 pounds. However, the airport is capable of accommodating larger and heavier aircraft at the pilot's discretion. The designated design aircraft is the twin-engine Cessna 421. (Nevada County Airport Land Use Compatibility Plan, p. 3-2 (https://www.nctc.ca.gov/documents/NCALUC/NCALUCP%20Final%209-21-11%20-%20Chapter%203%20-%20Background%20Data.pdf).)

The commenter asks how the danger to the airport can be mitigated and suggests special notifications on project activities, halting of flights during explosives transportation, and banning of explosives transportation during fire season. As stated on page 4.7-10 of the DEIR, according to the Nevada County General Plan EIR, land uses that could create hazards related to airport operations at the Nevada County Air Park include objects that exceed Federal Aviation Regulations Part 77 height standards, attract large concentrations of birds within approach/departure sectors, produce smoke, flash or reflect light, or generate electronic interference. As stated on page 4.7-36 of the DEIR, the project site is partially within Zones D and E of the Nevada County Airport Land Use Compatibility Plan (NCALUCP). For Zone D, airspace review is required for objects at elevations above 3,207 feet mean sea level (msl). The tallest point of the project site (the 165-foot-tall headframe building) would be at 2,912 feet msl. In addition, the project is not a noise-sensitive use, would not pose a hazard to flight, and would not exceed the density requirements; therefore, the project would comply with the requirements of the NCALUCP for Zones D and E. The project would not create smoke, moisture clouds, or

turbulence that would affect aircraft (see Response to Comment Grp 7-95). Implementation of Mitigation Measure 4.7-1 (a-d) would minimize risk, including to the Nevada County Airpark, from transport of explosives to a less than significant level.

Response to Comment Ind 664-3

The commenter asks if law enforcement will be adequately trained to respond to explosions. The training of law enforcement and fire district personnel is the responsibility of those respective organizations. Law enforcement is trained to deal with a variety of mass casualty and critical incidents including bombs and explosions. In addition, the law enforcement mutual aid system is implemented if a critical incident overwhelms local knowledge or resources.

Mitigation Measure 4.7-1(d) requires that prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan (HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site. The HMBP ensures that emergency response agencies, including fire and police, have access to current data including types of chemicals, quantities, maps of chemical locations, and evacuation assembly areas (see https://www.nevadacountyca.gov/2179/Hazardous-Material-Business-Plan).

The commenter asks what if an explosion levels a building and cuts off any ability for communication with law enforcement and suggests a notification and compensation program to neighbors within a possibly impacted blast area. With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Regarding the compensation program for reduced property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 664-4

The commenter asks whether any Zone Haven evacuation zones will be designated near hazardous materials at the project site. The mine site can be its own zone. This is achieved relatively easily and the remaining zones would have the same numbers they currently have.

Response to Comment Ind 664-5

In accordance with MSHA regulations, section 48.5, each new miner shall receive no less than 40 hours of training as prescribed in this section before such miner is assigned to work duties. Such training shall be conducted in conditions which as closely as practicable duplicate actual underground conditions, and approximately 8 hours of training shall be given at the minesite. Training includes but is not limited to the recognition and avoidance of hazards present in the mine, particularly any hazards related to explosives where explosives are used or stored at the mine; and the health and safety aspects of the tasks to be assigned, including the safe work procedures of such tasks, the mandatory health and safety standards pertinent to such tasks, information about the physical and health hazards of chemicals in the miner's work area, the protective measures a miner can take against these hazards, and the contents of the mine's HazCom program. Records of employee training shall be made available to MSHA personnel during mine inspections.



Response to Comment Ind 664-6

Please see Response to Comment Ind 664-5.

Response to Comment Ind 664-7

The commenter asks about the regulatory costs of the project. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 664-8

The commenter asks how the project will ensure the Brunswick Site will not require a remediation cleanup plan like the Centennial Industrial Site. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 664-9

The commenter asks if there will be a security bond in place for the project. The commenter also asks who will pay the cleanup in the event of an explosion. These comments do not pertain to the adequacy of the DEIR. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan.

Minimum levels of financial responsibility for motor carriers transporting hazardous substances are provided in 49 CFR 387 (see https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-387). The commenter is also referred to Table 4.7-2 of the DEIR, which details federal regulations for the transport of explosives. In regards to comments on the Project Applicant's reputation, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 664-10

The commenter states that page 4.7-17 of the DEIR misleadingly finds that Nevada County's General Plan allows for explosives to enter the County. The DEIR is not misleading, it simply references the applicable provisions in the General Plan that govern the County's approach to hazard and disaster response preparedness.

The Project Applicant would be responsible for any hazardous waste cleanup caused by the project. Motor carriers transporting hazardous materials would be responsible for hazardous waste cleanup caused during transport. Minimum levels of financial responsibility for motor carriers transporting hazardous substances are provided in 49 CFR 387 (see https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-387). The commenter is also referred to Table 4.7-2 of the DEIR, which details federal regulations for the transport of explosives.

The commenter states that the project presents a hazardous waste cleanup risk and that a hazardous situation could result in road closures or flight cancellation and suggests a compensation to affected business and residences. The comment does not pertain to the adequacy of the DEIR. As discussed in Section 4.7-1, on pages 4.7-22 through 4.7-31 of the DEIR, with implementation of mitigation, the impacts related to the highly regulated transportation,



storage and use of hazardous materials is considered less than significant. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." Regarding economic issues the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 664-11

The commenter suggests a modification of the Nevada County General Plan and remediation of all brown fields mining sites in Nevada County before approval of any mine. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 664-12

The commenter asks if Nevada County's Environmental Health Department will be adequately staffed and trained to enforce the project's Hazardous Materials Business Plan. This comment does not pertain to the adequacy of the DEIR. Regarding the Project Applicant's enforcement of mitigation measures and conditions of approval, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 664-13

The commenter references Nevada County's Emergency Operations Plan (EOP), the Standardized Emergency Management System (SEMS) and FEMA's Comprehensive Preparedness Guide (CPG) and whether other business are subject to these plans and guidelines. The documents referenced by the commenter are emergency operations plans to be used by the County for natural disasters and manmade emergency incidents. DEIR page 4.7-18 provides additional information on the Nevada County Emergency Operations Plan. The purpose of this section of the DEIR is to provide a summary of regulatory control pertaining to hazardous materials. A CEQA document for other projects would provide similar information. The comment does not address the adequacy of the DEIR and requires no further response.

Response to Comment Ind 664-14

The commenter states that the project's vicinity to the Nevada County Airport is a significant impact and should be sufficient not to approve the project. As stated on page 4.7-36 of the DEIR, the project would not result in a safety hazard or excessive noise for people residing or working in the project area related to the Nevada County Air Park. Therefore, impacts related to airport safety hazards and noise would be less than significant. Please also see Response to Comment Ind 664-2.

Response to Comment Ind 664-15

The commenter states that the DEIR's discussion of Impact 4.7-1 contradicts itself by stating the impact would be less than significant, but concludes the impact is significant. The DEIR does not contradict itself. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the proposed project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site, to a less-than-significant level.

The commenter also states that the DEIR fails to identify the transportation route for delivery of explosives and is concerned about the safety risks of transporting explosives through the community. As stated on page 4.7-24 of the DEIR, hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a CHP hazardous materials transportation license and U.S. DOT hazardous materials permits. State Routes 20 and 49 are designated as explosive transport routes by the CHP. The DEIR analyzed the transport, storage, and use of explosives in DEIR Chapter 4.7 and found the impacts to be less than significant after mitigation.

Response to Comment Ind 664-16

The commenter states that the DEIR should include a reference to the American Table of Distances for explosives and the DEIR should discuss the training and qualification of both project employees who handle explosives and emergency responders. Regarding the training of emergency responders, the commenter is referred to Response to Comment Ind 664-3. The commenter is also referred to Chapter 4.11 of the DEIR which discusses Public Services.

Regarding the project's use of explosives, explosives are not proposed to be stored on surface. Contrary to the commenter's assertion, page 4.7-27 of the DEIR specifically refers to the American Table of Distances. As stated on page 4.7-27 of the DEIR, it is likely that locations of underground magazines, determined through the risk assessment, would be located further by connecting tunnels and shafts from surface than the distances specified in the American Table of Distances (ATD). It is worth noting that no fatalities or serious injuries have ever occurred within the distances specified by the ATD in the extremely rare events where a detonation of an explosive magazine has occurred.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement.

Regarding economic issues, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 664-17

The commenter is concerned about security issues at the Brunswick site. As stated on page 4.11-26 of the DEIR, in order to deter potential crime at the Brunswick Industrial Site, the property would be fenced and gated. A security officer would always be on-site to ensure controlled access to the mine. The commenter states that fencing and perimeter security details are required in the DEIR. However, engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

The commenter is also concerned about the bonding requirements for reclamation of the mine. As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan.

Response to Comment Ind 664-18

The commenter states that, despite the DEIR's assertion otherwise, mining would occur within 500 feet of the surface. The paragraph referred by the commenter on page 4.7-28 of the DEIR discusses transportation of explosives from underground magazines to underground working areas and states "Explosives required for loading drift rounds or longhole blasts would be transported directly from the underground magazine to the working area and therefore explosives quantities in transit underground would be a maximum of approximately 500 pounds at any given location. No mining is proposed closer than 500 feet to surface; thus, explosives in transport would be at least this distance from the surface."

As stated on page 4.7-26 of the DEIR, upon delivery to the project site, explosives and detonators would be immediately transported underground to designated storage facilities and placed in separate magazines pursuant to federal OSHA and MSHA regulations, including 29 CFR 1926.904, subdivision (b) and 30 CFR 57.6102, and California regulations, including Title 8 CCR 5251, subdivision (a). The materials would not be stored above ground.

The commenter speculates that the Brunswick shaft may be blocked within 500 feet from surface and will require explosives to blast through. However, the applicant has inspected the shaft to this depth with an underwater vehicle and no such obstruction is present in the Brunswick Shaft. (see https://www.risegoldcorp.com/uploads/content/feb20-risegoldbrunswicksurvey.pdf) Lastly, a condition of approval for the project will require that no blasting, except for the construction of the service shaft, will be conducted closer than 500 feet below ground surface.

Response to Comment Ind 664-19

The commenter asks if the distances specified in the American Table of Distances will be adhered to given the proximity to the Brunswick and East Bennett areas. Explosives are not proposed to be stored on surface. As stated on page 4.7-27 of the DEIR, it is likely that locations of underground magazines, determined through the risk assessment, would be located further by connecting tunnels and shafts from surface than the distances specified in the American Table of Distances (ATD). It is worth noting that no fatalities or serious injuries have ever occurred within the distances specified by the ATD in the extremely rare events where a detonation of an explosive magazine has occurred.

Response to Comment Ind 664-20

The commenter lists a number of concerns pertaining to the transport of explosives. As stated on page 4.7-24 of the DEIR, hauling of explosives would occur using Brunswick Road to State Routes (SR) 20/49. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a CHP hazardous materials transportation license and U.S. DOT hazardous materials permits. State Routes 20 and 49 are designated as explosive transport routes by the CHP.

With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. The commenter speculates that an explosion may occur which would impact senior facilities and suggests various training programs and bonding. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

The commenter states that explosions have caused the death of thousands of people and obliterated hundreds of homes. However, as stated on page 4.7-25 of the DEIR, the transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries.

Regarding comments on the airport and aircraft, the commenter is referred to Response to Comment Ind 664-2.

Response to Comment Ind 664-21

The commenter raises questions regarding the handler's facilities in connection with explosives and the Nevada County Department of Environmental Health's role in handling explosives. In the context of the referenced paragraph on page 4.7-23 the "handler's facilities" are the Project Applicant's project sites.

In regard to explosions requiring evacuation of hundreds of people, the commenter is referred to Response to Comment Ind 664-20.

Nevada County Environmental Health Department employees would not handle explosives or be a first-responder to emergencies. As stated on page 4.7-23 of the DEIR, the NCEHD would monitor the conditions and completion of remediation measures. The commenter is referred to Response to Comment Ind 664-3 regarding training of emergency responders.

Response to Comment Ind 664-22

The commenter raises a number of concerns regarding the transport of explosives through the community but does not comment on the adequacy of the DEIR. In regards to delivery schedule of explosives in relation to the analysis of explosives transport risk, the commenter is referred to Master Response 10 – Explosives, Reagents, and Brunswick Fill.

In regard to risk of explosions to the airport, the commenter is referred to Response to Comment Ind 664-2.

In regard to the Loma Rica housing development and property disclosures, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

With implementation of mitigation, the impact related to transportation, storage and use of hazardous materials is considered less than significant. Please see Response to Comment Ind 664-1.

The commenter asks whether property owners will be notified of blasting activities and states that blasting vibrations will affect the health of people with fragile health conditions. No such notification is necessary. As stated on page 4.10-58 of the DEIR, the project is not anticipated to result in the exposure of persons to or generation of excessive groundborne vibration levels. Nonetheless, out of an abundance of caution, in order to ensure that actual mining operations would generate vibration levels as expected, a Ground Vibration Monitoring Program is required. Without quantitative evidence and regular monitoring from the Ground Vibration Monitoring Program, a significant impact related to the generation of groundborne vibration could occur. Implementation of Mitigation Measure 4.10-4 would ensure the above potential impact is less than significant. Please also see Master Response 7 – Location of Future Mining.

Response to Comment Ind 664-23

The commenter raises general concerns about the project's use of explosives. The commenter also states the DEIR contradicts itself by labeling an explosives-related risk as both significant and less than significant. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site to a less-than-significant level.

The commenter states that almost every week explosions of chemicals that are proposed for use at the project occurs and cites a fire at an ammonium nitrate plant in North Carolina as evidence. However, the plant cited did not explode and a fertilizer plant is not proposed for the project. As stated on page 4.7-28 of the DEIR, the use of explosives in modern underground mines is made safe due to the many regulations and safety measures adopted in the United States. There have been only three incidents attributed to Explosives and Breaking Agents resulting in fatalities in the past 25 years (1995-2021) in all underground metal mines in the United States. Two of these incidents (2010 and 2011) were directly related to explosives and one of the incidents was related to CO poisoning from insufficient ventilation and was unrelated to explosives. None of the incidents presented a risk to the public from the use of explosives underground. As stated on page 4.7-25 of the DEIR, the transportation of explosives in the United States has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the United States. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only 1 incident resulted in injuries.

The commenter believes the threshold of significance for hazards should be zero risk or a 100% certainty that residents are not exposed to any risk. However, CEQA does not require 100% certainty, as this could never be achieved. Rather, as stated by California Courts, "[t]he need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376.)

Response to Comment Ind 664-24

The commenter asks whether the Nevada County Planning Department has the expertise to address safety issues with explosives and states that the Risk Assessment should be in the DEIR. The U.S. Mines Health and Safety Administration (MSHA) is the regulator for underground mine safety, including the regulation of underground storage of explosives. As stated in Mitigation Measure 4.7-2(b), the Risk Assessment will be submitted to MSHA for their review. Regarding the inclusion of the Risk Assessment in the DEIR, explosives storage has been analyzed in the DEIR and an engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 664-25

The commenter asks whether the Nevada County Planning Department has the expertise to review the agreement found in Mitigation Measure 4.7-1(c). The U.S. Department of Transportation regulates the transport of explosives through numerous regulations as described on pages 4.7-22 through 4.7-26 of the DEIR.

Response to Comment Ind 664-26

The commenter asks whether the Nevada County Planning Department has the expertise to review the Hazardous Materials Business Plan and that the plan should be included in the DEIR.

Hazardous Materials Business Plans (HMBP) are routinely submitted for various project sites throughout the County under the requirement of CalEPA. (see https://www.nevadacountyca.gov/2179/Hazardous-Material-Business-Plan). The Project Applicant is responsible for preparing the HMBP. The HMBP shall be prepared prior to the transport of explosives and reviewed and approved by the County in accordance with Mitigation Measure 4.7-1(d).

Response to Comment Ind 664-27

The commenter states that the DEIR's discussion of hazard-related impacts contradicts itself by labeling the same impact as both significant and less than significant. As stated on page 4.7-31 of the DEIR, it is conservatively concluded that the project could result in a significant impact related to the routine transport, storage, and use of explosives. Implementation of the mitigation measures 4.7-1(a) through 4.7-1(d) would minimize the risk from transport, underground storage, and use of explosives at the Brunswick Industrial Site to a less-than-significant level.

The commenter also requests that the DEIR includes a discussion on how the Project Applicant interacts with each applicable regulatory agency. CEQA does not require this level of detail. "The need for thorough discussion and analysis is not to be construed unreasonably… to serve as an easy way of defeating projects. Absolute perfection is not required." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 406.)

The commenter also questions the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility. Moreover, a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other local, state and federal agencies, those agencies will be responsible for their enforcement.

Individual Letter 665

Ray Kinman
woodcarverguru@gmail.com, 530.277.5200

April 1, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Matt,

It's hard to know where to begin, since there are so many areas of concern with the Rise Gold Mine.

Ind 665-1

So I will begin with introducing myself. My name is Ray Kinman, and I live and work off of Greenhorn Road. I moved to this beautiful area 13 years ago because of the beautiful, serene nature of it. If the mine were to be approved, it would dramatically alter the nature of our community to such an extent that I would no longer find it tolerable to live here. This is how deeply I feel about this.

I have reviewed the DEIR report, and what strikes me is that it is so completely out of line with what suits our community, and it so under-states the huge and long-terms impacts that it would have on our community, as to border on the absurd.

Some of the **many** objections that I have to the mine are as follows:

Ind 665-2

1) **Surface and groundwater water impacts are inadequately addressed in the DEIR report.**
   a) Deir only has plans to address 39 wells, when there are potentially hundreds affected
   b) What impact would this have on the already extremely high forest fire hazard, and especially when we are in the midst of a multi-year drought?

Ind 665-3

2) **Visual impacts are unmitigated in the report**
   a) There would be what amounts to a skyscraper in our beautiful forest; engineered backfill off Brunswick that is 40+ feet tall; deforestation with minimal replanting of trees, and only along road corridors; the pristine nature of our dark nighttime sky would be gone.

Ind 665-4

3) **Traffic impacts would be huge, unmitigated, unavoidable**

Ind 665-5

4) **The mine runs counter to the need to reduce greenhouse gas emissions**
   a) As the residents of Nevada County strive to live in a more ecologically-conscious manner, the progress made would be obliterated by the additional greenhouse emissions by the mine.

Ind 665-6

5) **Explosives** would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.

Ind 665-7

6) **Air quality impact is inadequate in the report**
   a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.

Ind 665-8

7) **Clean-up of the Centennial site not included in the report**

Also – if it were to be approved, do we really want to open the door to other mining companies to come to our beautiful community and alter our lifestyles, scar our land, pollute our air, drain our water, fill the beautiful night sky with lights, fill the roads with traffic, and assault our ears with noise?

Ind 665-9

I say most definitely NOT!

Let's leave the charm of our community intact and our mining history quaintly in our past, where it belongs.

Sincerely,

Ray Kinman
12888 Lost Lake Road
Grass Valley, CA

INDIVIDUAL LETTER 665: RAY KINMAN

Response to Comment Ind 665-1

This comment is introductory in nature and the commenter is opposed the project. The commenter's opposition is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 665-2

The commenter states that the DEIR underestimates the number of groundwater wells the project would impact. The commenter also implies that the project's use of groundwater could exacerbate fire hazards. As stated on page 4.13-21 of the DEIR, it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. The dewatering would not, therefore, increase fire risk due to reduced groundwater levels. The commenter is also referred to Master Response 33 – Groundwater Dependent Vegetation. Regarding groundwater, please also see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 665-3

The commenter states that the project would result in adverse impacts to aesthetics. The commenter also suggests the project would result in light pollution. The DEIR concludes that the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings and such impacts would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.1-21–22.) Regarding light pollution, the DEIR concluded that the project would not create a new source of substantial light which would adversely affect day or nighttime views and that such impacts would be less than significant. (DEIR, p. 4.1-23.) Please see Chapter 4.1 of the DEIR regarding aesthetics impacts of the project.

Response to Comment Ind 665-4

The commenter states that the project's traffic-related impacts would be "huge, unmitigated, [and] unavoidable" but does not provide additional detail. The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersections at Brunswick Road and State Route 174 (level of service impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.12-56.)

Response to Comment Ind 665-5

The commenter states that project would result in adverse impacts to air quality due to increased GHG emissions. The DEIR states that the project's GHG-related impacts would less than cumulative considerable. (DEIR, p. 4.3-92, 99.) Please also see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 665-6

The commenter is concerned about the project's transport, use, and storage of explosives at the Idaho-Maryland Mine. Chapter 4.7 of the DEIR analyzed explosives and found the impacts to be less than significant after mitigation. Please also see Master Response 10 – Explosives, Reagents, and Brunswick Fill. Regarding noise from use of explosives, please refer to page 4.10-44 of the DEIR, where the DEIR concludes that blasting noise would be below the County's applicable thresholds.

Response to Comment Ind 665-7

The commenter states that project would result in adverse impacts to air quality. The commenter is referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 665-8

The commenter states that the DEIR should include the remediation of the Centennial Industrial Site. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 665-9

The commenter states that the project should not be approved. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 666

Ray Kinman

woodcarverguru@gmail.com, 530.277.5200



April 1, 2022

Matt Kelly, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

Dear Matt,

It's hard to know where to begin, since there are so many areas of concern with the Rise Gold Mine.

Ind 666-1 So I will begin with introducing myself. My name is Ray Kinman, and I live and work off of Greenhorn Road. I moved to this beautiful area 13 years ago because of the beautiful, serene nature of it. If the mine were to be approved, it would dramatically alter the nature of our community to such an extent that I would no longer find it tolerable to live here. This is how deeply I feel about this.

I have reviewed the DEIR report, and what strikes me is that it is so completely out of line with what suits our community, and it so under-states the huge and long-terms impacts that it would have on our community, as to border on the absurd.

Some of the **many** objections that I have to the mine are as follows:

Ind 666-2
1) **Surface and groundwater water impacts are inadequately addressed in the DEIR report.**
   a) Deir only has plans to address 39 wells, when there are potentially hundreds affected
   b) What impact would this have on the already extremely high forest fire hazard, and especially when we are in the midst of a multi-year drought?

Ind 666-3
2) **Visual impacts are unmitigated in the report**
   a) There would be what amounts to a skyscraper in our beautiful forest; engineered backfill off Brunswick that is 40+ feet tall; deforestation with minimal replanting of trees, and only along road corridors; the pristine nature of our dark nighttime sky would be gone.

Ind 666-4
3) **Traffic impacts would be huge, unmitigated, unavoidable**

Ind 666-5
4) **The mine runs counter to the need to reduce greenhouse gas emissions**
   a) As the residents of Nevada County strive to live in a more ecologically-conscious manner, the progress made would be obliterated by the additional greenhouse emissions by the mine.

Ind 666-6

5) **Explosives** would be brought to our community as they are transported, stored, and utilized on the mine site, bringing noise and the potential for accidents which could result in calamity.

Ind 666-7

6) **Air quality impact is inadequate in the report**
   a) We already score an F rating in terms of air quality, and mine emissions would only serve to worsen it.

Ind 666-8

7) **Clean-up of the Centennial site not included in the report**

Also – if it were to be approved, do we really want to open the door to other mining companies to come to our beautiful community and alter our lifestyles, scar our land, pollute our air, drain our water, fill the beautiful night sky with lights, fill the roads with traffic, and assault our ears with noise?

Ind 666-9

I say most definitely NOT!

Let's leave the charm of our community intact and our mining history quaintly in our past, where it belongs.

Sincerely,

Ray Kinman

Ray Kinman
12888 Lost Lake Road
Grass Valley, CA

Ind 666-10

P.S. I am very concerned about the impact the mine would have on the value of our homes. Several of my neighbors have also decided they will move if the mine goes through. Who would want to buy + live here?

12888 Lost Lake Road, Grass Valley, California 95945

INDIVIDUAL LETTER 666: RAY KINMAN

Response to Comment Ind 666-1
Please see Response to Comment Ind 665-1.

Response to Comment Ind 666-2
Please see Response to Comment Ind 665-12

Response to Comment Ind 666-3
Please see Response to Comment Ind 665-3.

Response to Comment Ind 666-4
Please see Response to Comment Ind 665-4.

Response to Comment Ind 666-5
Please see Response to Comment Ind 665-5.

Response to Comment Ind 666-6
Please see Response to Comment Ind 665-6.

Response to Comment Ind 666-7
Please see Response to Comment Ind 665-7.

Response to Comment Ind 666-8
Please see Response to Comment Ind 665-8.

Response to Comment Ind 666-9
Please see Response to Comment Ind 665-9.

Response to Comment Ind 666-10
Property value is outside the scope of CEQA – please see Master Responses 1 and 2. The comment has been forwarded to the decisionmakers for their consideration.

Individual Letter 667

From: Becca D <beccaxdepont@yahoo.com>
Sent: Monday, April 4, 2022 3:45 PM
To: Idaho MMEIR
Subject: Idaho MM Draft EIR Comment

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April 4, 2022

Matt Kelley, Senior Planner

(Sent electronically to Idaho.MMEIR@co.nevada.ca.us)

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-8617

Subject: Idaho-Maryland Mine Project Draft EIR (SCH # 2020070378)

Dear Mr. Kelley,

Ind 667-1

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Idaho-Maryland Mine Project (proposed project). The proposed project would reinitiate underground mining and gold mineralization processing for the Idaho-Maryland Mine over an 80-year permit period with gold mineralization processing and underground exploration and mining proposed to operate 24 hours a day, 7 days a week during full operations. The operations of the proposed would allow for unmitigable impacts on our community for 80 years resulting in significant and unavoidable environmental impacts as well as the damage the character and vitality of the community.

Significant and Unavoidable Impacts

The Draft EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures:

Ind 667-2

• Aesthetics

The Draft EIR determined that the proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The Draft EIR also determined that the project's incremental contribution to the significant cumulative impact related to substantial degradation of visual character or quality would be cumulatively considerable and significant and unavoidable.

• Noise.

1

The Draft EIR determined that during construction activities, the project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity (i.e., residents along East Bennett Road during construction of the potable water line). Even with implementation of mitigation, the impact would remain significant and unavoidable.

• Transportation and Circulation

The draft EIR determined that the proposed project would result in a significant impact at three study intersections under the EPAP Plus Project scenarios, one of which would be significant and unavoidable even after mitigation (Brunswick Road/SR 174). The Draft EIR also determined that the proposed project would have a cumulatively considerable incremental contribution to two intersections under both Cumulative Plus Project scenarios, one of which would be significant and unavoidable Draft EIR Idaho-Maryland Mine Project December 2021 Chapter 6 – Alternatives Analysis Page 6-8 even after mitigation (Brunswick Road/SR 174). In addition, the project's incremental traffic would cause a significant impact at one intersection queue during both Cumulative Plus Project scenarios (Brunswick Road/Sutton Way) Mitigation measures are identified and required for the aforementioned cumulative impacts, but it cannot be guaranteed that the measures would reduce the incremental impacts to a less than cumulatively considerable level.

Preference of the No-Build Alternative

Preference of the Environmentally Superior Alternative, which is Alternative 1: No Project (No-Build) Alternative. The No-Build ensure that the project area and the public would not result in project related impacts in the following CEQA Appendix G sections:

- Aesthetics
  - The proposed project would result in a significant impact related to substantially degrading the visual character or quality of the site and its surroundings. Even after mitigation, the impact would remain significant and unavoidable. The proposed project would result in tailings, the reduction of vegetative cover, the erection of industrial use buildings, mining equipment, engineered fill, and frequent trucks to transport materials. The No-Build would not impact the visual character or quality of the site and its surroundings.
- Air Quality
  - The proposed project would result in more truck traffic to the project area resulting in more air quality emissions, which may affect the health of the community even with the implementation of mitigation measures. The No-Build would not disturb naturally occurring asbestos as could possibly occur during underground mining.
- Biological Resources
  - The No-Build would not have the potential to impact special-status plants, foothill yellow-legged frog, western pond turtle, California red-legged frog, California black rail, coast horned lizard, special-status bats, and non-special status raptors and migratory birds. In addition, the Alternative would not result in any substantial adverse effects on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on federal or State protected aquatic resources.
- Cultural Resources
  - The No-Build would not substantial adverse effect would not occur to the underground mine workings, which were determined to be historically significant pursuant to the National Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR). The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Energy
  - The No-Build would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The No-Build would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Ind 667-3

2

- Geology/Soils
  - The No-Build would not include underground mining and generation of engineered fill, grading or other ground-disturbing activities, substantial soil erosion would not occur. In addition, the near-surface geotechnical features identified for closure due to dewatering of the mine would not be adversely impacted, though they may currently pose some level of risk that would continue under the Alternative. Other geotechnical issues that could pose a significant effect under the proposed project, but would not pose an adverse effect under the Alternative, include potential seismic hazards at the Brunswick Industrial Site and slope stability associated with temporary steep cut slopes at the new service shaft collar. However, the proposed project would fix a few existing geotechnical issues that would remain under this Alternative, including the safety concern related to the presence of the South Idaho Shaft on the Centennial Industrial Site, and an unstable portion of the clay-lined pond dam on the Brunswick Industrial Site.
- Greenhouse Gas Emissions
  - The No-Build would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- Hazards & Hazardous Materials
  - The proposed project could result in a significant impact related to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, specifically, the transport and underground storage and use of explosives at the Brunswick Industrial Site. Compliance with applicable federal (MSHA, OSHA), State (CCR), and local regulations, and the additional mitigation measures in the Draft EIR, would reduce the significant hazard related to transport, underground storage and use of explosives to a less-than-significant level. Because the use of explosives would be eliminated under the No-Build, the significant impact would also be eliminated. The Draft EIR determined that the proposed project could result in a significant impact related to creating a significant hazard through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment related to the Brunswick Industrial Site, given the presence of elevated arsenic in the southeastern paved area, potential residual petroleum contamination in a few locations, and presence of groundwater monitoring wells of unknown status. The No-Build would result in fewer
  - impacts related to hazards and hazardous materials.
- Hydrology/Water Quality
  - The No-Build would not result in on-site construction disturbance or above-ground operations such that the following project-related significant impacts to water quality would not occur: Centennial Industrial Site: engineered fill pad construction; Brunswick Industrial Site: operations within industrial area, underground placement of Cement Paste Backfill, use of clay-lined pond for water treatment process purposes, engineered fill pad construction, and treated water discharge in South Fork Wolf Creek. In addition, the No-Build would not necessitate dewatering of the mine; thus, there would not be a substantial reduction in groundwater supplies resulting in effects to nearby wells, though the proposed project includes mitigation to offset impacts to wells (i.e., provision of potable water service). Further, due to the lack of on-site operations, the No-Build would not result in the substantial alteration of drainage patterns, and for the Centennial Industrial Site, risk release of pollutants in a flood hazard area.
- Noise
  - The No-Build would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity, nor a substantial permanent increase in ambient noise levels in the vicinity of the project due to haul truck traffic. In addition, the Draft EIR concludes that the combined operational noise sources at the Brunswick Industrial Site could result in a significant noise impact. With respect to vibration, the Draft EIR determined that while blasting is not projected to exceed applicable thresholds, a ground vibration monitoring program should be implemented to determine the actual levels of ground vibration at commencement of mining. These operational noise and vibration impacts would not occur under the No-Build.

3

- Tribal Cultural Resources
  - The No-Build would not impact any unknown cultural and tribal cultural resources should they be encountered during construction.
- Transportation
  - The No-Build would not generate construction traffic or operational vehicle traffic on local roadways and, thus, unlike the proposed project, the Alternative would not result in a significant construction traffic impact, nor would General Plan LOS policy conflicts occur under the EPAP Plus Project conditions to the intersections of Brunswick Road/Idaho Maryland Road, Brunswick Road/SR 174, and Idaho Maryland Road/Centennial Drive; and under the Cumulative Plus Project scenarios to the intersections of Brunswick Road/SR 174 and Sutton Way/Dorsey Drive. The proposed project would also result in a significant effect to the intersection queue during the Cumulative Plus Project scenarios (Brunswick Road/Sutton Way), which would not occur under this Alternative. Further, the Draft EIR determined that proposed project (Brunswick Industrial Site operations) would have an impact related to truck turn movements at the Millsite Road/E. Bennett Road project egress at the Brunswick Industrial Site; this effect would not occur under this Alternative. The Draft EIR determined that some of the above-noted impacts would be considered significant and unavoidable due to the uncertainty concerning certain mitigation measures. The subject impacts are the EPAP Plus Project and Cumulative Plus Project intersection impacts to Brunswick Road/SR 174 and the Cumulative Plus Project intersection queue at Brunswick Road/Sutton Way. These significant and unavoidable impacts would be eliminated under this Alternative.
- Wildfire
  - The No-Build would not result in a significant impact related to exacerbating wildfire hazards, as compared to the proposed project. For example, above-ground machinery would not be operated at both project sites. Therefore, potential vegetation fires associated with on-site equipment operations would be substantially reduced under the No-Build.

Beyond the Scope of CEQA

CEQA can be narrow in scope and does not address various issues such as social or economic issues.

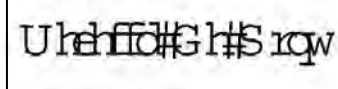
The Draft EIR notes relevant caselaw on how impacts on private views are not studied under CEQA. Although this is true and accurate under CEQA, the property owners for those that would be impacted by the next 80 years of constant operation and construction would surely face a reduction in property value. Overall, the operations of the mine may act as a deterrent for the community and reduce the overall appeal of tourism as well as the demand for property within the area.

Ind 667-4

California droughts are affecting the entire state and the dewatering of our ground water supplies are going to exacerbate the issue. The area is highly prone to wildfire and the existence of the proposed project will exacerbate the wildfire risk within the project area which would affect the community at large. The permit period of 80 years is far too long, that is longer than most individuals may live and could have devastating effects on the community that would go unchecked for 80 years. The jobs the proposed project may bring into the area do not offset then potential impacts to the community and the environment. This is a quaint and appealing town, please do not decimate the positive aspects of this town for big business.

Thank you for the opportunity to review and comment on the Draft EIR. If you have any questions or would like clarification, please contact me here, beccaxdepont@yahoo.com

Sincerely,



Rebecca De Pont

INDIVIDUAL LETTER 667: REBECCA DEPONT

Response to Comment Ind 667-1

The comment does not directly address the adequacy of the DEIR. The commenter states that the DEIR identifies impacts that are considered significant and unavoidable.

The DEIR states that, before approving a project, the lead agency shall certify that the Final EIR has been completed in compliance with CEQA, and that the Final EIR has been presented to the decision-making body of the lead agency, which has reviewed and considered the EIR. (DEIR, p. 1-9.) The lead agency shall also certify that the Final EIR reflects the lead agency's independent judgment and analysis. (*Ibid.*) The findings prepared by the lead agency must be based on substantial evidence in the administrative record and must include an explanation that bridges the gap between evidence in the record and the conclusions required by CEQA. (*Ibid.*) If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. (*Ibid*.)

Response to Comment Ind 667-2

The comment restates content from the DEIR and does not address its adequacy. No further response is required.

Response to Comment Ind 667-3

The commenter indicates a preference for the No Project Alternative and does not address the adequacy of the DEIR. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 667-4

The comment expresses property value concerns, which are outside the scope of CEQA. Please see Master Responses 1 and 2. The commenter also expresses concerns regarding drought and wildfire. Please see Master Response 6 – Wildfire Impacts and Master Response 16 – Drought and Climate Change. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 668

From: Rebecca Vandegrift
To: bdofsupervisors
Subject: No Mine
Date: Thursday, March 3, 2022 11:52:55 AM

Dist 4

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Ind 668-1

Dear Honored Public Officials
I wish to make my voice heard in OPPOSING the opening of the Gold Rise Mine. The disastrous effects on so many levels that this project will bring to our community far outweigh any benefits. As a 30+ years member of this community, I implore you to keep our town clean and healthy and free from outside influences that come to take our resources and leave us to clean the mess. Your constituents are looking to you to protect our water, our air, our quality of life in this place we call home. I sincerely thank you for your time, Rebecca Vandegrift 16249 Thornberry Way Grass Valley,95949
Sent from my iPad

INDIVIDUAL LETTER 668: REBECCA VANDERGRIFT

Response to Comment Ind 668-1

The comment does not address the adequacy of the DEIR, but expresses general concerns and opposition to the proposed project. Regarding general water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding general air concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 669

From: Reed Hamilton <reedhamilton2@gmail.com>
Sent: Thursday, March 24, 2022 7:42 PM
To: Idaho MMEIR
Subject: DEIR Hazards

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Mr. Matt Kelley

Senior Planner

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902 (530) 265-1423

Ind 669-1

I am concerned about a deficiency in the DEIR regarding transportation of explosives to the Brunswick mine site. In chapter 4.11-24, Public Services and Utilities, the DEIR states that explosives will be transported by licensed explosives drivers under strict United States Department of Transportation rules via Brunswick Road from Highway 20/49. That route involves the very busy Sutton Way intersection, the Idaho-Maryland intersection, the Whispering Pines intersection, the Loma Rica Road intersection, and the Bennett road intersection. However, the DEIR does not state how often shipments would be arriving, what quantities would be involved, nor what times of day they would happen.

Ind 669-2

According to table 4.12-2 of the Transportation chapter, the following intersections have various levels of service. The Brunswick/Sutton intersection Level Of Service (LOS) varies from A to C depending on the time of day. Despite being signalized the intersection is multi-lane in all directions with right and left turn lanes involved, so complex traffic patterns lead to inevitable mishaps. The Brunswick/Idaho-Maryland Road intersection has a LOS that varies from A to F depending on direction. The Brunswick/Whispering Pines intersection has an eastbound left turn lane where drivers must contend with traffic speeding westbound up the hill. The Brunswick/Bennett Road four-way stop has LOS C at busy times of day.

Table 4.12-16 indicates that all sections from SR 49 to E. Bennett Road have peak hour LOS C or D when the survey was done, before the addition of the 50 to 100 mine trucks transporting tailings that will be using Brunswick from the mine site to Idaho-Maryland Road, or the 200 some employees of the mine. At 4.12-5 the DEIR notes that the Brunswick/Idaho-Maryland intersection saw illegal turn and through travel by vehicles, and page 16 notes that the same

1

intersection, plus those at Whispering Pines Lane and Bennett Street met the signal warrant, meaning that they may need a traffic light.

In regard to explosives deliveries, the trucks will be traveling through intersections that currently have LOS from C to F during peak hours. Vehicles traveling eastbound on Brunswick from the mine site will be building up speed down the steep grade from the Loma Rica Road traffic light. The speed limit there is 50 mph but heavy vehicles such as tailings trucks may struggle to limit their speeds while lighter vehicles, especially those of people leaving work at the Loma Rica Industrial Park will be speeding up. In addition, without a traffic signal at Idaho-Maryland Road, some vehicles will be turning left at the bottom of the hill without the aid of a signal.

It is easy to imagine the results of a heavy mine truck or even a passenger vehicle colliding with an explosives truck at any of the three signal-warranted intersections. As the Loma Rica Ranch housing development on the north side of Brunswick Road is built out there will be a large concentration of people and dwellings in the immediate vicinity with the possibility of large loss of life in the event of such a collision. Though the Brunswick/Sutton intersection has LOS from A to C, the complexity of the intersection and the traffic loads at busy times could lead to a disastrous accident.

It is imperative that the DEIR define the frequency, timing, and quantity of explosives being delivered and a specific regimen to assure the safety of county residents. It is also imperative that a traffic study immediately after the mine opening be specified and if there is any loss of service level or dangerous traffic patterns are detected that Rise Grass Valley be required to pay the full cost of installing signals at the warranted intersections so that residents don't have to pay for impacts they did not cause.

2

INDIVIDUAL LETTER 669: REED HAMILTON

Response to Comment Ind 669-1

The commenter is referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Response to Comment Ind 669-2

The commenter is referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

Individual Letter 670

From: Renata Henry <renatahenry122@gmail.com>
Sent: Monday, April 4, 2022 3:21 PM
To: Idaho MMEIR
Subject: Public comment on mine reopening

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Hello,

Ind 670-1 I am a 31-year-old Grass Valley resident and educator, and I am writing regarding the proposed Idaho-Maryland mine.

I live 8 miles from the proposed mine site, and I am extremely concerned on how the reopening of the mine would impact my community and beautiful town. In particular, the pollution to the air and water in our community that would result from the mine operations. I don't believe that the DEIR adequately addresses these issues. For example, it cites that the mine operations would not have to adhere to the 100 foot buffer building zone currently in place on Wolf Creek. When I walk my dogs in this area, I still spot acid mine drainage from when the mine was open long ago. If we lower our protections currently in place for mine operations, how is the pollution going to get any better when we still haven't been able to clean up completely from the past?

Ind 670-2 I also question the plan to measure air quality in the region of the mine. The DEIR doesn't seem to include the totality of air pollutants from mine operations. For example, the DEIR does not include the 4,000+ metric tons of greenhouse gases that would be emitted from cement alone per year as part of its greenhouse gas emission measurements. As someone who already struggles with health effects from fire season and poor air quality in Nevada County, I want to know that any new industrial activity that contributes particulate matter, exhaust and greenhouse gases to the air is being measured accurately and thoroughly.

These are just a few of the areas in the DEIR that seem inadequate and incomplete to me, and I urge you to demand a new DIER that is done correctly.

Thank you for your time,

Renata Henry

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INDIVIDUAL LETTER 670: RENATA HENRY

Response to Comment Ind 670-1

The commenter is concerned that the project would allow for development within the required 100-foot setback from the Riparian Area of a Perennial Watercourse. The commenter also states that acid mine drainage is still visible and is concerned that reopening the mine will lead to additional pollution. Mitigation Measure 4.4-3(b) requires the applicant to implement the Watercourse/Wetlands/Riparian Areas Management Plans prepared for the Centennial Industrial Site and Brunswick Area, as approved in their final form by Nevada County. Specifically, the applicant shall implement the mitigation measures and conditions identified in the Management Plans, which include measures designed to protect aquatic resources and the biological resources they support. Required measures for encroachment into non-disturbance buffers and restoration of area adjacent to impacted streams are included in the mitigation measure. (DEIR, p. 4.4-87–88.) Regarding the acid mine drainage, the commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 670-2

The commenter states that the DEIR fails to include approximately 4,000 metric tons of GHGs that would be emitted from cement each year. The commenter also states that emissions generated by the project would impact the air quality of the region. Regarding the emissions generated from cement, the commenter is referred to Master Response 26 - Life Cycle GHG emissions. Regarding the impacts to air quality, the commenter is referred to Master Response 18 - Air Quality Thresholds.

Individual Letter 671

From: Theresa Huck <theresahuck@gmail.com>
Sent: Monday, April 4, 2022 9:39 AM
To: Idaho MMEIR
Subject: Draft EIR Comment

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Dear Planning Commission,

In response to the Draft EIR, I would like to says that in the entire process there is nothing that truly addresses human health. The Yellow Giant mine (Mossman's previous bankrupted venture) has not addressed the human health catastrophe he created there. There is a human health crisis trapped in the water in that mine.

Ind 671-1

Methylated mercury, arsenic, lead, chromium and more is trapped in the old mine tunnel. Those tailings have been lying there since the mine was closed. Our health system, here in Nevada County, does not currently have the bandwidth or knowledge to deal with what will come out of the dewatering.

The point of environmental review, such as this draft EIR is to look at all the ways this will affect us. This does not accurately address protections and handling of the tailing that are in the mine already and will be moved downstream by flushing. This DEIR is short sided and does not address this in a way that it needs to be.

Thank you for your time.

Resa

Resa Huck
(She, Her, Hers)

I understand that I am on Nisenan land that was never ceded and the original tribal families have yet to recover from the near genocide of their people.

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INDIVIDUAL LETTER 671: RESA HUCK

Response to Comment Ind 671-1

The comment does not directly address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. Regarding the commenter's statement that methylated mercury, arsenic, lead, chromium, and more is trapped in the old mine tunnel, the water in the mine contains only iron and manganese above state water quality guidelines (as discussed in Section 3.4.1.1 of Appendix K.2). The proposed on-site water treatment plant has been designed to adequately treat iron and manganese to state standards. The water treatment plant will be permitted by the State prior to its approval and operation. For further detail, please see Mitigation Measure 4.8-1(a). Please also see Master Response 8 – Mine Waste Characterization.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 672

From: richcharnley@gmail.com
To: bdofsupervisors
Subject: Idaho-Maryland mine
Date: Wednesday, March 23, 2022 8:04:52 PM

Dist 3

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Ind 672-1

Hello, my name is Richard Charnley, owner of Empire Shoes in Grass Valley and resident of district three. I've lived in Nevada County for over thirty five years and I oppose the reopening of the I Idaho-Maryland mine. There are too many negatives associated with the reopening of the mine. Some of the negative impacts are: Pollution of the air and environment, the amount of our power that will be consumed, the amount of our water that will be used, the dumping of mine waste, and most importantly the pain and suffering due to noise levels, loss of wells, loss of property values and more that the residents living within a half mile or more from the mine will have to endure. As the county supervisors it's your job to do what's best for and protect the people of Nevada County...all the people. There are too many things that can go wrong with this mine, and we all know there will be many things that will go wrong. This is a bad deal. Too many negatives. You'll be making a deal with Rise Gold, a company with a record of failure and incompetence. What do you think is going to happen if you make a deal with a company that's incompetent?...you'll be like a bank loaning money to a company that defaulted on it's last loan. Don't put the people of Nevada County in that

Ind 672-2

position... And lastly, If you do approve this mine reopening, you know the residents that will be affected negatively by the mine, including myself are not going to be happy. If we have to endure loss of wells, noise from the mine and the lowering of our property values, we are not going to go down without a fight, you can expect legal repercussions. Think of the cost of that?... but let's not even go there. You were elected to do the right thing for Nevada County and to protect all the people living here, that's your job! Do your job and the right thing ....do not approve the reopening of the Idaho Maryland mine.

Sincerely, Richard Charnley

Sent from Mail for Wind

This email has been checked for viruses by Avast antivirus software.
www.avast.com

INDIVIDUAL LETTER 672: RICHARD CHARNLEY

Response to Comment Ind 672-1

The comment does not directly address the adequacy of the DEIR. For concerns regarding well impacts, please see Master Responses 14 and 15; for general concerns regarding pollution of the environment, please see Master Response 8 (Mine Waste Characterization) and 35 (Discharge to South Fork Wolf Creek); for concerns related air pollution, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to energy use, please see Chapter 4.3 and Impact 4.11-6 (pg. 4.11-34) of Chapter 4.11; and for concerns related to noise, please see Chapter 4.10, Noise and Vibration. Property value is outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 672-2

Please see Response to Comment Ind 672-1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 673

From: RICHARD DRACE <richard.drace@gmail.com>
Sent: Monday, April 4, 2022 7:31 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: RISE Gold DEIR comments

Dear Members of the *Nevada County Planning Commission*:

Clearly, the proposed mitigations for the *RISE Gold Idaho-Maryland* mine application need to be carefully critiqued.

However, please also consider the precarious lack of ***organizational capacity*** of *RISE Gold* to successfully implement whatever proposed mitigations might finally be submitted.

In effect, *RISE Gold* is proposing an ***eighty year marriage*** with Nevada County, and, as with any suitor, promises mean little if they are not carried out.

Considering how little we could have predicted eighty years ago — (in 1942!) — about our circumstances today, our County would assume ***a level of risk far outweighing any potential benefits***.

Ind 673-1

If this suitor were to fail to follow through, and abandon our Nevada County family, we would suffer serious consequences for years to come.

Based on both its past performance and its current advocacy, *RISE Gold* has demonstrated a worrisome t***otal lack of credibility*** to fulfill its promises.

Please consider this letter an ardent request to recommend denial of this project application to the *Nevada County Board of Supervisors*.

Sincerely,

Richard L. Drace
1241230 Liquidambar Lane, Grass Valley

INDIVIDUAL LETTER 673: RICHARD DRACE

Response to Comment Ind 673-1

Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 674

From: Richard Johnston
To: Idaho MMEIR
Subject: Rise Mine
Date: Sunday, February 20, 2022 12:57:37 PM

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Dear Mr. Kelly,

Ind 674-1

After my review of the DEIR, I fail to see what many others are concerned about. Sure, there will be some increased industrial traffic, power utilization and waste production. I believe the needed mitigations were provided by the company and that there is little to warrant stopping them from proceeding. In my mind, the threat of a community asking to stop a legitimate business for personal reasons should never be enough to stop the project from moving forward. Had there been definite health and safety issues arise in the DEIR, my tune would have changed tremendously. Being a father of four and a property owner in Nevada County, I do care about the environment and our surroundings just as much as the next person. This project doe not threaten our livelihoods like some are attempting to make it seem.

Please accept this as my vote to move the project forward and allow Rise to open the mine back up. I feel that it will open several unknown revenue streams within the county without any major negative impacts.

Thank you!
Richard Johnston
17762 Brewer Rd
Grass Valley CA 95949
5303686206

INDIVIDUAL LETTER 674: RICHARD JOHNSTON

Response to Comment Ind 674-1

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 675

From: samba2night <samba2night@gmail.com>
Sent: Monday, April 4, 2022 2:05 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea nc.org
Subject: Questions regarding the Rise Gold hydrology data in the Draft EIR

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Ind 675-1

Does the draft EIR address the issue that the current Northern California water models used for predicting future water conditions are seriously out of date, due much in part by the rapid effect of climate change taking place?

One of the most important tools for predicting and managing water during periods of drought are the models developed by various state and federal agencies such as the National Weather Service's Office of Hydrologic Development, the Army Corps of Engineers and the California Department of Water Resources. Yet these models suffer from a simplistic view of drought and water, and they are in dire need of an update. In the Draft EIR it is stated that the predicted drop in feet of existing wells in the areas is within a permissible number of feet.

How was this drop in feet of existing surrounding wells calculated in the Rise Gold Draft EIR and what scrutinizing has been applied to the data?

And, importantly, was the fact that existing water models currently used by the State of California acknowledged to be out of date and unreliable?

Below, according to Dr. Schwartz, the lead scientist and station manager at the University of California, Berkeley, Central Sierra Lab:

> "Land surfaces, snow melt patterns and the climate have all changed since many climate models were developed, which means they're missing crucial pieces of today's water puzzle. What's prevented updates to the models for decades is shrinking funding for science and engineering.
>
> Models may not be able to reliably inform water managers how much rain and snow will run off the land into reservoirs, which can mean severe shortages in a worst-case scenario. Given the shrinking reservoir levels and meager snowpacks of recent years, discrepancies between the water expected and that which arrives could mean the difference between having water in the taps or entire towns running dry.

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We are looking down the barrel of a loaded gun with our water resources in the West. The current water monitoring and modeling strategies aren't sufficient to support the increasing number of people that need water. These are problems that we'll inevitably face as climate change continues and water becomes more unpredictable.

It's time for policymakers who allocate funding to invest in updating our water models rather than maintaining the status quo and hoping for the best. Large-scale investment in the agencies that maintain and develop these models is paramount to preparing for the future of water in the West.

Better water models ultimately mean more accurate management of water, and that will lead to greater water security and availability for the millions of people who now depend on the changing water supply. It is an investment in our future and, further, an investment in our continued ability to inhabit the water-scarce regions in the West".

Respectfully,

Rick Range

22 year resident of Nevada County.

Sent via the Samsung Galaxy Note10+, an AT&T 5G Evolution capable smartphone

INDIVIDUAL LETTER 675: RICK RANGE

Response to Comment Ind 675-1

The commenter states that the DEIR's groundwater analysis is premised on models that are out of date and unreliable due to climate change. The commenter does not identify how the DEIR is inadequate with respect to impacts to groundwater. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 16 - Drought and Climate Change.

Individual Letter 676

From: samba2night <samba2night@gmail.com>
Sent: Monday, April 4, 2022 2:03 PM
To: Idaho MMEIR; DEIRcomments@cea-nc.org
Subject: FW: Comments on Draft EIR Submission

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I am forwarding to you comments we submitted on March 28 to Idaho.MMEIR@co.nevada.ca.us

Sent from my Galaxy

-------- Original message --------
From: samba2night <samba2night@gmail.com>
Date: 3/28/22 11:56 AM (GMT-08:00)
To: Idaho.MMEIR@co.nevada.ca.us
Subject: Comments on Draft EIR Submission

Adhering to the April 4th deadline:

These are our concerns that need to be thoroughly investigated in the final EIR:

1. Groundwater-affects of the mine's activities on the groundwater for residents in the area with wells

Ind 676-1 The mine operation of dewatering huge amounts of water and other water use operations could significantly affect ground water levels leading to dry wells or less productive wells. If the affect of the dewatering cannot scientifically assure there will be no impact on the residential wells, the project should not go forward. Our existing wells are already stressed because of climate change and longer and hotter droughts, leaving aquifers that are unable to be sustained. The final EIR must take into account projected lower water tables due to drought and higher temperatures that are certain to increasingly occur because of climate change. And not to assume our current water conditions will extend in the future. There is little room for error considering the already adverse conditions that we will face without the mine. Another concern is the seismic affects of the dynamiting at the site.

Ind 676-2 2. How will the underground dynamiting affect the structure of the underground fissures and aquifers that deliver water to wells? How will it change given the complexities and interdependence of fissures in the course of underground water flow in surrounding areas? What provisions are there to mitigate a domino effect that may adversely ripple through them, considering possible the interlinking of these aquifers?

Ind 676-3 3. Air Quality

Nevada county is not in compliance with the state and local air quality standards. The county experiences bad air quality due to regular wildfires and being located at the edge of the inversion layer from the Sacramento Valley and the Bay

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Area. Our residents suffer from respiratory illnesses and increased cancers from breathing unhealthy air. The additional emissions from increased traffic and on-site processing of materials will further deteriorate our already bad air quality. The final EIR must address how these emissions will be mitigated to comply with the Air Resources Board's and the Northern Sierra Air Quality Management District's air quality standards.

4. Greenhouse gases and climate change

Ind 676-4 Any EIR must consider the effects of fossil fuels and other greenhouse gases. This is also linked to our county being designated an "extreme fire danger area". Our county could become unlivable if greenhouse gases are not mitigated. The county General Plan has zoned the property for medium density and residential business park. The General Plan is required to consider the affect of fossil fuels and other greenhouse gases in its planning. Zoning is part of that planning. The window to reduce greenhouse gases is closing behind us. Action must be taken now if we are to avoid its worst affects. The final EIR should address the rezoning as linked to the above issues.

5. Monitoring and oversight

Ind 676-5 The final EIR should also include the monitoring, oversight, and penalties associated with the implementation of the project, both civil and criminal. How do we stop the mining company from either willfully breaking or claiming ignorance of the regulations to operate around these rules to their economic advantage?

It appears that Rise Gold has already ignored regulations in their test drilling operations.

6. Transportation and circulation

Ind 676-6 Hwy. 174 is a major road that forms the corridor from Hwy. 80 into Grass Valley. Additional traffic congestion from the project will impede the flow of transportation into the Brunswick basin. This is downplayed in the DEIR.

7. Aesthetics

Ind 676-7 As a major entry way into Grass Valley, the project would change the character of our rural Grass Valley-Nevada City area as a desirable place for tourists and residents to want to visit and live here.

Sincerely,
Rick and Dianne Range
17100 Sunset Mountain Place
Grass Valley

Sent from my Galaxy

INDIVIDUAL LETTER 676: RICK AND DIANNE RANGE

Response to Comment Ind 676-1

The commenter is concerned that the project will have adverse impacts on groundwater wells, leading to dry or less productive wells. The DEIR analyzed the project's impact to groundwater supplies and found the impacts to be less than significant after mitigation. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

The commenter is concerned about the seismic effect of explosives used at the site but provides no specifics regarding this concern. The magnitude of the mine rock excavation and placement is far smaller than the magnitude of the mass of bedrock underlying the site. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. The commenter is referred to the NV5 Memo attached to the Final EIR as Appendix P. Blasting vibrations are analyzed in Chapter 4.10 of the DEIR.

Response to Comment Ind 676-2

The commenter is concerned that the underground blasting will impact the hydrological connection to private groundwater wells. As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surround rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

Response to Comment Ind 676-3

The commenter states that Nevada County's air quality is already poor and that the project will exacerbate those conditions. The commenter states that the DEIR must demonstrate the project will comply with air quality standards. The DEIR demonstrates that the project will comply with applicable air quality standards with implementation of mitigation measures. (DEIR, 4.3-66.) The commenter is also referred to Master Response 18 - Air Quality Thresholds.

Response to Comment Ind 676-4

The commenter states that the DEIR must analyze GHG emissions. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 676-5

The commenter states that the Final EIR should include a monitoring program for the project and the commenter also references the Project Applicant's prior mining project. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The project mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 676-6

The commenter states that the DEIR understates the project's traffic-related impact to SR 174. However, the DEIR acknowledges that the project's impact to the intersection at SR 174 and

Brunswick Road would be significant and unavoidable. While the DEIR concludes that the proposed project would have a significant and unavoidable impact to the SR 174/Brunswick Road intersection, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

Response to Comment Ind 676-7

The commenter states that the project would change the visual character of the surrounding area. The DEIR has determined that the project would have a significant and unavoidable aesthetics impact even after implementation of mitigation. (DEIR, p. 4.1-14-15.)

Individual Letter 677

From: samba2night <samba2night@gmail.com>
Sent: Monday, March 28, 2022 11:57 AM
To: Idaho MMEIR
Subject: Comments on Draft EIR Submission

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Adhering to the April 4th deadline:

These are our concerns that need to be thoroughly investigated in the final EIR:

1. Groundwater-affects of the mine's activities on the groundwater for residents in the area with wells

The mine operation of dewatering huge amounts of water and other water use operations could significantly affect ground water levels leading to dry wells or less productive wells. If the affect of the dewatering cannot scientifically assure there will be no impact on the residential wells, the project should not go forward. Our existing wells are already stressed because of climate change and longer and hotter droughts, leaving aquifers that are unable to be sustained. The final EIR must take into account projected lower water tables due to drought and higher temperatures that are certain to increasingly occur because of climate change. And not to assume our current water conditions will extend in the future. There is little room for error considering the already adverse conditions that we will face without the mine. Another concern is the seismic affects of the dynamiting at the site.

Ind 677-1

2. How will the underground dynamiting affect the structure of the underground fissures and aquifers that deliver water to wells? How will it change given the complexities and interdependence of fissures in the course of underground water flow in surrounding areas? What provisions are there to mitigate a domino effect that may adversely ripple through them, considering possible the interlinking of these aquifers?

3. Air Quality

Nevada county is not in compliance with the state and local air quality standards. The county experiences bad air quality due to regular wildfires and being located at the edge of the inversion layer from the Sacramento Valley and the Bay Area. Our residents suffer from respiratory illnesses and increased cancers from breathing unhealthy air. The additional emissions from increased traffic and on-site processing of materials will further deteriorate our already bad air quality. The final EIR must address how these emissions will be mitigated to comply with the Air Resources Board's and the Northern Sierra Air Quality Management District's air quality standards.

4. Greenhouse gases and climate change

Any EIR must consider the effects of fossil fuels and other greenhouse gases. This is also linked to our county being designated an "extreme fire danger area". Our county could become unlivable if greenhouse gases are not mitigated. The county General Plan has zoned the property for medium density and residential business park. The General Plan is required to consider the affect of fossil fuels and other greenhouse gases in its planning. Zoning is part of that planning. The window to reduce greenhouse gases is closing behind us. Action must be taken now if we are to avoid its worst affects. The final EIR should address the rezoning as linked to the above issues.

1

5. Monitoring and oversight

The final EIR should also include the monitoring, oversight, and penalties associated with the implementation of the project, both civil and criminal. How do we stop the mining company from either willfully breaking or claiming ignorance of the regulations to operate around these rules to their economic advantage?

It appears that Rise Gold has already ignored regulations in their test drilling operations.

6. Transportation and circulation

Hwy. 174 is a major road that forms the corridor from Hwy. 80 into Grass Valley. Additional traffic congestion from the project will impede the flow of transportation into the Brunswick basin. This is downplayed in the DEIR.

7. Aesthetics

As a major entry way into Grass Valley, the project would change the character of our rural Grass Valley-Nevada City area as a desirable place for tourists and residents to want to visit and live here.

Sincerely,
Rick and Dianne Range
17100 Sunset Mountain Place
Grass Valley

Sent from my Galaxy

INDIVIDUAL LETTER 677: RICK AND DIANNE RANGE

Response to Comment Ind 677-1

This letter is a duplicate copy of Individual Letter 676. Please see comments and responses in Individual Letter 676.

Individual Letter 678

From: kathleen smith <hockeyisluv@gmail.com>
Sent: Friday, March 18, 2022 1:42 PM
To: Idaho MMEIR
Subject: Please don't open the mines

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Ind 678-1 We are 43 year residence of Grass Valley. We are opposed to this. We hope this doesn't go through. Rick and Kathleen Smith

INDIVIDUAL LETTER 678: RICK AND KATHLEEN SMITH

Response to Comment Ind 678-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 679

To: Matt Kelley, Senior Planner, Members of the Planning Commission and Board of Supervisors.
Re: Idaho Maryland Mine – Rise Gold, Grass Valley
Fr: Ricki Heck, Homeowner, **13641 Greenhorn Road**, Within the mineral rights zone March 23, 2022

Dear Mr. Kelly -

I have lived on my property since the early 1980's, built my home, raised my children and now am enjoying retirement; all on the same property. I have lovingly tended to the gardens, landscape and hardscape over 40 years. This is my home and my treasure. I am writing to share my concerns about the adequacy of the EIR and highlight those areas where I believe the Draft EIR is simply inadequate.

Ind 679-1

Water Quality Impacts to Neighborhoods.

- ***My well and that of three of my immediate neighbors does not appear on the Applicants map of wells.*** The state database, Well Completion Report does not show my well, or that of 3 of my immediate neighbors. My well was drilled in 1981 by a private person who either did not know to report it or simply did not report. ***How many other wells may be unaccounted for?*** *This omission is a serious inadequacy of the DEIR.*

Ind 679-2

- Please require the Applicant to conduct a door to door, parcel by parcel inquiry to obtain an accurate count of the number of wells within the mineral rights area and within 1,000 feet of the mineral rights area. I believe a door-to-door survey may have been a condition of approval for the EmGold project, 20 years ago. This may be the only way to obtain an accurate count of the number of wells in the project area.

Ind 679-3

- Once an accurate count of wells is produced, I believe the Applicant should then conduct both potability and mineral/metal content testing, at the applicant's expense, of each well to establish a baseline. I believe the scope of potential water contamination may be far greater than is currently considered and can only be measured by an established baseline examination.

Ind 679-4

- Should wells beyond the scope of the project become compromised or contaminated, Rise would need to be required to extend NID system lines well beyond their current E. Bennet area to serve all households with compromised wells. I know the costs of connecting to NID is substantial, and would need to include actual hookups to each home paid for by Rise, and 80 years' worth of water payments to NID, including any costs in the raise in rates that are likely to occur over the term of the operations. Both the financial impacts and the environmental impacts should be evaluated in the event the number of wells exceeds the 30 as identified by the applicant.

Ind 679-5

- At what levels of contamination or change in water quality would be mandated for Rise to take action for private well owners, how will that be defined? Please include a definition of how "contamination" is measured

Ind 679-6

- I also note an omission in the DEIR that does not reveal levels of arsenic or mercury from their water sampling. Either this was an omitted test or left out of the discussion. Please require this information to be included in the document.

- Our well has produced sparkling clear, pure water since it was drilled, about 1981. That well is my only source of water. It has performed beautifully and reliably for my family and gardens for over 40 years.

Noise.

Ind 679-7

- One of the things I love most about living on my land is the quiet. I am extremely worried and concerned that the noise generated from the mining operations, said to be 24 hrs day / 7 days a week, would simply ruin the rural quality of my home and life and that of the other residents who live within the sphere of the project

Ind 679-8

- Please, please, should the project go forward, put reasonable restrictions on operating hours. In the EmGold process, I believe it was 7:00 am to 6:00 pm. No noise or trucks would be allowed outside of those hours.

Ind 679-9

- If the project is allowed to go forward without restrictions on operating hours, I simply could not live with the noise and traffic impacts. I would need to leave the neighborhood, my beloved home and gardens.

Traffic and Fire Evacuation. The DEIR does not adequately address traffic and Fire Evacuation Routes.

Ind 679-10
- The DEIR did not mention fire evacuation routes in the Traffic Impact Analysis Appendix, this is a serious oversight.

Ind 679-11
- The Greenhorn, E. Bennett, and Brunswick areas are known severe high fire areas and its residents have very few options for fire evacuation. Yet the DEIR says on page 594, "The Greenhorn Road area would likely have several evacuation zones because it is a relatively large area". This statement is ridiculous. I would suggest the Applicant work with the Fire Wise Communities of each area of potential impact to more accurately assess risks.

Ind 679-12
- The information in the DEIR with regard to evacuation routes was simply a cut and paste exercise of existing general plan, OES, and Cal Fire evacuation protocols. I did not see any efforts to discuss how the hundreds of employees and the vehicles and trucks would impact the community in the event of an evacuation.

Ind 679-13
- The assertion in section 4.7.4 and 4.13.1 of Table 2.1 states the impacts to the emergency response and emergency evacuation as being less than significant seems wrong. Upon what information is this conclusion based upon? It cannot be the Traffic Impact Analysis because that document does not address fire evacuations.

Ind 679-14
- Please require an in-depth analysis of specific impacts of the increased load due to the mining operations.

Inverse Condemnation. The DEIR should address ***local*** conditions within the real estate market.

Ind 679-15
- As a 30-year real estate professional, I strongly believe that if allowed to move forward, the homeowners within the sphere of the project may have their homes devalued and be unable to sell for fair market value, or more likely, be unable to sell at all. I believe the noise, water and traffic conditions alone would be a "taking", a cause for an inverse condemnation action.

Ind 679-16
- While I do understand that CEQA does not require an economic analysis, our local area would be severely impacted from a collapse of real estate values of the several hundred homes surrounding the project. I ask that a ***local*** analysis be made using ***local*** real estate professionals on the impacts to home values in the sphere of the project. The DEIR should address local conditions within the real estate market, and offer mitigations in the event such a "taking" occurs.

Ind 679-17
- This information will be valuable in assessing the applicant's claim of economic benefits against the loss of home value and the corresponding equity that is present in our community.

Collapsing Tunnels. – The DEIR must address the issue of collapsing tunnels.

Ind 679-18
- As a long-time real estate professional, I have personally witnessed a brand-new home, nearby the project in the Brunswick Pines area that fell into a previously unknown mine tunnel. It happened about 15-20 years ago.

Ind 679-19
- I would like to see a specific study on the probability of homes and lands being swallowed once the dewatering takes place. This is a *real* concern, and something that happens more often than is thought. Tunnel collapses can happen anywhere.

Ind 679-20
- I did not see a reference in the DEIR regarding collapsing tunnels or sink holes, or an offer of mitigation in the event of a collapse. This must be considered.

Ind 679-21
My concerns are many, with only a few stated here. While mining may have given Nevada County its beginnings; our lifestyle, economy and quality of life have changed since those days. There are homes and families that have invested in our community by building residential communities around this mine area. ***I urge you and the Board of Supervisors to demand the best for our community. Please require the Applicant to reevaluate the many inadequacies of the DEIR, do further research, re submit and recirculate the DRAFT. Please ask yourselves; "If my home was in this area, how would I feel, what assurances would I want and what protections do I deserve."***

Respectfully,

Ricki Heck

13641 Greenhorn Road

INDIVIDUAL LETTER 679: RICKI HECK

Response to Comment Ind 679-1

As discussed in Section 3.3.2 and shown on Sheet 12 of Appendix K.2 of the DEIR, over 1,200 Water Well Driller Reports (also known as Well Completion Reports) available from the California Department of Water Resources (DWR)'s online database for private domestic wells are located within approximately one to two miles of the project site. Many of these wells are geolocated by property location in the DWR database while some are only located by the US Public Land Survey System (PLSS) township, range, and section. In areas within the predicted 1-foot drawdown from the groundwater model, wells with only general PLSS locations in the DWR database were matched to properties and plotted. The well database was also augmented with well data from the previous applicant Emgold, which provides additional well information within the 1-foot drawdown isopleth that is not available in the DWR database. All available details about well construction and testing in the area of the 1-foot drawdown isopleth were reviewed and tabulated from the Well Completion Report or Emgold records and are provided and discussed in Section 3.3.2 of Appendix K.2. which are available for the majority of properties. The Well Mitigation Plan has been clarified to include measures to identify any wells not in the well database and gather individual well characteristics should an impact be predicted by the Groundwater Monitoring Plan. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D. The commenter states that a complete inventory of domestic water wells within and beyond the mineral rights boundary is required for the analysis of the DEIR. However, wells outside the 1-ft drawdown were not specifically analyzed for impacts from mine dewatering because they would experience negligible drawdown and therefore would not be significantly impacted by mine dewatering. More effort in including these wells in the well database would not change the analysis nor conclusions of the DEIR, nor the necessary mitigation measures, and therefore is not required.

With respect to the commenter's property specifically, this property is located outside of the 1-ft isopleth as shown on Sheet 12 of Appendix K.2 of the DEIR and therefore is predicted to experience negligible drawdown (less than one foot) and impact from mine dewatering. Approximately five wells adjacent to the commenter's property are mapped on Sheet 12 based on the DWR database information. Nevertheless, the groundwater monitoring plan is implemented to ensure that any impact would be predicted and preemptively mitigated, if necessary. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 679-2

Please see Response to Comment Ind 679-1.

Response to Comment Ind 679-3

Baseline groundwater quality data is required to be collected 12 months before the commencement of mine dewatering and will be collected from groundwater monitoring wells which will be representative the groundwater quality in surrounding domestic water wells. Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 679-4

The Well Mitigation Plan has been clarified to explain actions that would be taken for well mitigation, if required, in more detail. Please see the revised Well Mitigation Plan attached the Final EIR as Appendix D. Well mitigation outside of the E. Bennett area may not include the connection to NID potable water depending on the circumstances, as storage tanks and/or well deepening may be adequate solutions. Any mitigation required for wells impacted by the project would be done so at the cost of the applicant. Please also see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 679-5

Mitigation Measures are designed to ensure wells would not be contaminated by mining activities and baseline groundwater quality data will be collected and groundwater quality will be monitored throughout operations. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 679-6

Arsenic and mercury were analyzed in water samples. Please see Tables 3-6, 3-7, and 3-9 of Appendix K.2.

Response to Comment Ind 679-7

Comment noted regarding the commenter's existing groundwater well. Noise from project activities has been analyzed in Chapter 4.10 of the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Also see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 679-8

Noise from project activities, including nighttime activities, has been analyzed in Chapter 4.10 of the DEIR and is less than significant after mitigation. The applicable CEQA threshold of significance for noise impacts is not "no noise". Please see Chapter 4.10 and Appendix L of the DEIR. Also see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 679-9
Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 679-10
Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. Please also see Master Response 5 - Evacuation Zones.

Response to Comment Ind 679-11
The Greenhorn Road area is currently broken into two evacuation zones. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 679-12
Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 679-13
Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. The analysis is based on review of available data and correspondence with agency staff, including County OES and applicable fire agencies. Please refer to the footnotes in Chapter 4.13. Please also see Master Response 5 - Evacuation Zones.

Response to Comment Ind 679-14
Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 679-15
The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 679-16
The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 679-17
The comment does not address the adequacy of the DEIR but has been forwarded to the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 679-18
As discussed on page 6 of Appendix H.6, the Old Brunswick mine features were described during the parcel map creation in a geotechnical report by Anderson (1986), who conducted test boring and delineated areas inappropriate for residential construction over the Old Brunswick mine features which were incorporated into the final map for Bet Acres.

As discussed on page 6 of Appendix H.6, the Old Brunswick Incline Shaft is located at 12305 Bet Road. The feature extends from the ground surface at an incline of approximately 45 to 50 degrees to the 1,250-level of the mine. A Non-engineered soil/rock backfill collapsed in 1998 at the existing residence location. The collapse was likely associated with a vertical excavation to the ground surface from the incline shaft. The collapsed portal was closed by engineered design and the foundation of the house was underpinned (Carlton Engineering, Structural Engineer Thomas Burkhart, S.E. 4378) in 2000 and 2001. Design and permitting documents are on file with Nevada County Building Department (Permit # 72094).



Near surface workings and subsidence are analyzed on pages 4.6-44 through 4.6-47 and Appendix H.6 of the DEIR. Please also see Master Response 29 - Near Surface Workings.

Response to Comment Ind 679-19

The commenter states that a tunnel collapse can happen anywhere. However, a tunnel must actually be present and such a tunnel must be close to surface to cause subsidence. Please see Response to Comment Ind 679-18, DEIR pages 4.6-44 through 4.6-47, and Appendix H.6 of the DEIR. See also Master Response 29 - Near Surface Workings.

Response to Comment Ind 679-20

Near surface workings and subsidence are analyzed on pages 4.6-44 through 4.6-47 of the DEIR and Appendix H.6 of the DEIR. Please also see Master Response 29 - Near Surface Workings.

Response to Comment Ind 679-21

The commenter's opposition to the project is noted for decisionmakers. The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met. Please also see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 680

From: Risa & Rob Roseman <rrzenrose@gmail.com>
Sent: Thursday, March 24, 2022 1:38 PM
To: Idaho MMEIR
Subject: Public Comment Letter

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Risa Roseman
245 N Auburn St.
Grass Valley, Ca 95945
530-613-4408
rrzenrose@gmail.com

March 23, 2022

Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
530-265-1423
Idaho.MMEIR@co.nevada.ca.us

Idaho.MMEIR@co.nevada.ca.us

Dear Mr Kelley,

My family and I live in downtown Grass Valley. We purchased out home in 2004 and since then have taken care of our 1870's Victorian and yard. We love our neighborhood and the proximity to downtown, library, stores and the Center for the Arts. It is a vibrant community of locals and tourists that keep these downtown business's going. I am very concerned about how the proposed Idaho-Maryland Mine Project by Rise Gold could impact our community. I've been reading the DIER and have some concerns about noise, traffic mineral processing and heaving equipment will impact on our community.

Ind 680-1

Noise and Vibration 4.10
Testing for Noise: Why are the noise testing areas limited to an area so close to the mine sites? The geography of Grass Valley is a VALLEY, noise travels far and wide. There should be noise test sites all over the county not just in close proximity to the mine sites. For example; Grass Valley at Mill St & Main St., Nevada Union High School, Union Hill School, Sierra Nevada Memorial Hospital and Sierra College.

Ind 680-2

Truck Traffic, Mineral Processing, Vibrations Levels of Heavy Earth Moving Equipment: Again I ask, why are the monitors and testing limited to areas only near the 2 mine sites? I request expansion of the monitoring to at least these suggested

sites: Grass Valley at Mill St & Main St., Nevada Union High School, Union Hill School, Sierra Nevada Memorial Hospital and Sierra College.

Ind 680-3 I oppose allowing Rise Gold to re-open The Idaho-Maryland Mine. It will not benefit our community in the short or long run. How can we in good conscience allow a business in our county that uses more water than we currently use, while the state of California and Nevada County is in such a severe drought and we are being asked to ration our water? How can we allow a company to open a business that will increase energy use in this county by 25% when we are having increased power outages due to fires, over use during peak hours and weather? The DEIR does not discuss mitigating plans for bringing more water or power to Nevada County. I think the DIER should address this, such as building a

Ind 680-4 renewable energy power plant to generate the additional power they need plus help meet the county's energy needs.

Sincerely,

Risa Roseman

INDIVIDUAL LETTER 680: RISA ROSEMAN

Response to Comment Ind 680-1

As discussed on page 4.10-4 of the DEIR, Bollard Acoustical Consultants conducted continuous noise level measurements at 11 locations in the project vicinity (see Figure 4.10-3 of the DEIR). The noise measurement locations were selected to be representative of ambient noise conditions at receptors nearest to both the Brunswick and Centennial Industrial Sites, at locations along East Bennett Road where the potable water system would be installed, and at receptors along the proposed haul routes. Any receptors further from these locations would be subject to lower noise levels, and thus, analysis of receptors located further away is not necessary.

The DEIR evaluates potential impacts associated with substantial increases in ambient noise levels relative to existing conditions under Impacts 4.10-1, 4.10-2, and 4.10-3. Where potential impacts are identified, the DEIR sets forth mitigation measures to reduce the severity level of the identified impacts to the extent feasible and discloses the level of impact that would occur subsequent to incorporation of mitigation. In its role as the lead agency, the County of Nevada will consider the information in the DEIR along with other information that may be presented to the agency in deciding whether to approve the project.

Response to Comment Ind 680-2

Please see Response to Comment Ind 680-1.

Response to Comment Ind 680-3

The comment does not directly address the adequacy of the DEIR. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 680-4

The DEIR evaluates potential impacts associated with water supply in Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities. The DEIR evaluates potential impacts associated with energy use in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please see the discussions and analyses contained therein. In addition, please see Master Responses 15 and 16.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 681

Nevada County Board of Supervisors/ Nevada County Planning Commission

950 Maidu Avenue
Nevada City, CA 95959-8617

Dear Supervisors and Planning Commission, March 13, 2022

Ind 681-1 I'm writing to you today because in reading the EIR, there is SO MUCH that has not been considered. How can they say there is 'minimal mitigation' needed when TON's of explosives are being trucked through our town every one to three weeks? Oh sure- the driver has to be a 'certified' explosive hauler.....that makes me feel so much better. If that truck is rear ended on the offramp it takes, it could blow up Grass Valley Charter School at Hwy 174 offramp, or Rite Aid drugstore at the Brunswick offramp, or maybe if we are lucky- it will be the Idaho Maryland offramp and only kill a few people in their cars and damage Hills Flat Lumber.

Ind 681-2 I've been a resident of Grass Valley- living right in the downtown area- for about 16 years now. I am also a business owner and have a shop on Loma Rica Dr. close to the airport which will be effected by the noise and pollution from the mine.
I moved here because of the beauty & quiet, peaceful nature of living in a small town. I realize that there has been a history of mining in this area for some 170 years, however I was under the impression that those days were done and most of the jobs and income was from tourism, or high tech business's to our beautiful area. We should be very careful not to pollute our air and water, so people will still come up to our town to enjoy the vibrant town we have created. The EIR has not really addressed many concerns-

Ind 681-3 1) How will the downtown area be affected by noise from the 100 truck trips per day.
a) Noise travels across the valley that Wolf Creek carves out along Idaho Maryland road. Trucks dumping material 100 times a day up by Centenial Dr. will be heard by many residents and then there is the grading and compacting operation, which they say will be running 7 days a week from 6AM-10PM. Really!!!! Even construction sites aren't suppose to operate on Saturdays and Sundays.....and then starting at 6 AM on a weekend.....there goes sleeping in.....This is unheard of and should not be allowed! I don't see where the EIR addresses this.

Ind 681-4 2) How will all those machines/trucks affect our air quality.
a) We already suffer from bad ozone pollution coming up from the Sac. Valley Do we really want all that extra particulate matter put into our air too? Is the extra 100 trips a day really something we need to "mitigate" with carbon credits? The air is not going to be cleaned by those 'carbon credits'

3) How will they insure that the explosives they use will be safely transported through our town? As the EIR states; Explosives would be transported to the Brunswick Industrial Site a maximum of once a week to a minimum of once every three weeks.

They may be getting off Highway 49 at the main downtown exit and there-by passing right by Grass Valley Charter School (formerly Hennessy) at the bottom of the exit-or perhaps they will get off at Idaho Maryland Rd. In which case they will wind up a very narrow stretch of road on Idaho Maryland between Sutton and Brunswick. (A road I frequently bike up-Large trucks going up this road are very scary as there is NO shoulder.)

4) How will they insure that the vibrations from the explosives they use won't effect the sensitive business's in Whispering Pines business area. Again- the EIR is just speculative:

The U.S. Bureau of Mines (USBM) and Office of Surface Mining, Reclamation, and Enforcement (OSMRE) have both developed recommendations for ground vibration levels to prevent damage to residential structures. Dr. Konya of Precision Blasting Services recommended a threshold level of 0.4 in/s PPV for the IMM project. The threshold level is based on previous studies for which it was determined that less than approximately eight percent of people would complain about blasting activities if the peak particle velocity was below 0.4 in/s. The project-specific blasting report recommends this threshold be applied at the location of receptors on surface to minimize annoyance and complaints.

Ind 681-5

Should we be content that only 8% of the population is upset/complaining about the vibrations from the blasting- what happens if it is 12% or 20%. What is the threshold of upset people considered acceptable?

a) How can we be assured that we won't be woken up in the middle of the night by little "earthquakes" from their underground explosions? Oh sure they have their noise receptors along the haul routes, but not right across the valley in Downtown. We will never know what woke us up in the middle of the night-and those sensors won't do us any good at figuring it out either……

Ind 681-6

b) Will they compensate landowners if there is damage to property from the shaking?

c) What about sink-holes caused by underground mining activity?

Ind 681-7

a) The city of Grass Valley already had to deal with a major sinkhole on Freeman lane by Wolf Creek, cause by a drainage pipe that was damaged and not releasing water into the creek.

b) What sort of bond might they be required to put up to insure that they are solvent enough to pay for any damages that might incur.

Ind 681-8

5) And for the people living very near to the site- Their property values are going to suffer mighty bad from having a mine move in and potentially de-water their wells. I know that Rise Gold has proposed hooking them up to NID, but they have already invested in drilling and maintaining their own wells, and now to be told they might not have water anymore and must pay the Utility for it.....that is not part of the deal these

people should be going through now. Especially because people have already suffered through this pandemic.

6) Do the young people of Nevada County really want the job of an underground miner? Has anyone taken a survey and asked them? I would bet that the new high school graduates of Nevada Union High School will not be lining up to apply for these jobs- and they certainly won't be making $94,000/year as Rise Gold says the 'average salary' is.....They will be making $20-$25/hour, risking their lives, to enrich a Canadian Companies stockholders. No thanks- Not my kids.

Ind 681-9

Please say NO to this enormous gamble that the county will be taking if it approves this mine.

Ind 681-10

I appreciate your thoughtful consideration.

Sincerely,
Rob Katzenstein
245 N. Auburn St.
Grass Valley, Ca. 95945 530 218-7124 robkatsolar@gmail.com

INDIVIDUAL LETTER 681: ROB KATZENSTEIN

Response to Comment Ind 681-1

The commenter is concerned about the transport of explosives required by the project. As stated on page 4.7-25 of the DEIR, the transportation of explosives in the U.S. has an excellent safety record. A review of DOT incident reports for highway transportation of class 1.1B, 1.4B, 1.1D, and 1.5D materials shows 149 incidents over the past 30 years in the U.S. The majority of these incidents were vehicle accidents resulting in no release or spillages. No fatalities were reported in any incidents and only one incident resulted in injuries. The commenter's remarks regarding an accident that cause an explosion is speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 681-2

The commenter provides an introduction and states we should be careful not to pollute air and water but does not identify how the DEIR is inadequate. Impacts to water are analyzed in Chapter 4.8 (Hydrology and Water Quality) of the DEIR. Impacts to air quality are analyzed in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR.

Response to Comment Ind 681-3

The commenter is concerned about the noise from trucks in downtown Grass Valley. The project does not propose any truck routes in downtown Grass Valley. (DEIR, Figure 3-13.) DEIR Chapter 4.10 (Noise and Vibration) analyzed noise impacts from trucks and found the impacts to be less than significant after mitigation. (DEIR, p. 4.10-31.)

Response to Comment Ind 681-4

The commenter is concerned with the project's impacts to air quality and questions the efficacy of carbon offsets. The commenter also questions how the project will ensure safe transportation of explosives to the project site. The commenter does not identify any inadequacies with the DEIR. Air emissions from trucks and other machinery are analyzed in the DEIR, and all impacts related to air quality were determined to be less-than-significant after mitigation. The commenter is referred to Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Appendix E.1 of the DEIR. The commenter is also referred to Master Response 18 - Air Quality Thresholds. Carbon offsets required under Mitigation Measure 4.3-7(b) would ensure that construction-related emissions would be reduced sufficiently to ensure that the project's incremental contribution of GHG emissions would be less than cumulatively considerable. A detailed discussion of explosives transportation and regulations is provided in Chapter 4.7 (Hazards and Hazardous Materials) of the DEIR.

Response to Comment Ind 681-5

The commenter is concerned about the noise and vibration impacts from the use of explosives and states that the DEIR is speculative but does not provide any additional information. As stated on page 25 of Appendix M of the DEIR, the mining activities are located far from downtown Grass Valley are no ground vibration is expected. It is highly unlikely for anyone in downtown Grass Valley to perceive the ground vibration or for the ground vibration to cause any damage.

Blasting activities are intermittent. As discussed in Chapter 4.10 of the DEIR and the Technical Blasting Report prepared by Precision Blasting Services (Appendix M to the DEIR), a maximum of 0.23 inches per second vibration is modeled where a longhole blast could occur directly

beneath a receptor at 500 feet depth. Notwithstanding the rarity of this situation, such a blast might occur every three or four days between shift changes (7:00 AM and 7:00 PM) and would last for only seconds. At 500 feet depth and a horizontal offset of 1,400 feet, such a longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Regular drift round blasting, occurring approximately twice daily over several seconds, are modeled to result in a maximum of 0.14 inches per second vibration at a depth of 500 feet directly beneath a receptor. At 500 feet depth and a horizontal offset of 900 feet, a drift round blast would be undetectable by blasting seismograph (PPV <0.05 in/sec). Historic mining was completed to approximately 1,600 feet depth and the majority of future mining would be below the historic mine. At this distance, regular drift round blasting and longhole blast would be undetectable by blasting seismograph (PPV <0.05 in/sec) at receptor locations directly above the blast location.

Response to Comment Ind 681-6

The commenter asks if property owners will be compensated if there is damage from vibrations. As stated on page 4.10-54 of the DEIR, all groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the U.S. Bureau of Mines recommendations and the levels at which structural damage to buildings is possible. Regarding economic damages, the commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 681-7

The commenter is concerned that the project will cause ground collapse or sinkholes. The commenter is referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 681-8

The commenter states that the property values will be negatively impacted if groundwater wells are affected by the dewatering of the mine. Regarding the impacts to groundwater wells, the commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding economic impacts to property values, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 681-9

This comment is about the potential jobs generated by the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 681-10

The commenter opposes the project and urges the County not to approve it. The commenter's opposition to the project is noted for decision makers. See Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 682

We DO NOT Support

I support re-opening the Idaho-Maryland Mine

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 682-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Dist 3

Name(s) Robert & Francesca Erickson

Address 144 Success Mine Loop ZIP 95945
Grass Valley CA

Phone 530-205-9751

Email Address ericksonrobert580@gmail.com

INDIVIDUAL LETTER 682: ROBERT AND FRANCESCA ERICKSON

Response to Comment Ind 682-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 683

From: Robert Gulbis
To: BOS Public Comment
Subject: no mine
Date: Tuesday, February 1, 2022 12:00:31 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

Ind 683-1 As a long term resident of Nevada County, I would like to express my very clear opposition to reopening the Idaho Maryland mine. There are numerous reasons why I feel this way, and implore the BOS to reject any proposal to reopen this mine.

Ind 683-2 Most obvious to me, is the draining and potential pollution of the groundwater. At this time of unprecedented wildfire danger, pumping millions of gallons of groundwater per day and flushing them down the river seems to be one of the worst ideas ever presented. If the forest has been suffering from drought, this will compound the danger many-fold.

Ind 683-3 The other major concern I have deals with the track record of this firm and its CEO. They have had numerous violations regarding environmental stewardship. As a landlord, when doing due diligence about potential tenants, if I contact a former landlord who tells me the tenant trashed the property I disqualify the application. This CEO will try to sweet talk you about his/their intentions, do not be swayed as this is lip service & nothing more. This leads to another significant concern, which is that this is not a local company. These people will be taking the lion's share of any profits away from this region, permanently. Yes there will be some new jobs for as long as certain profit margins are met. But those jobs will pay a fraction of what is being siphoned out of the project. And then when the project ends they will turn tail and leave without ever looking back. The only evidence of their presence will be damage to the environment and prolonged legal entanglements trying to make the owners be held fully accountable. The defense team will be paid for by what was once Nevada County gold, while the prosecution will be underfunded due to the economic impact of the mine re-closing.

Please reject this proposal and take the option of re-opening the Idaho Maryland mine off the table. This is a choice of basic decency.

Sincerely,
Robert Gulbis

INDIVIDUAL LETTER 683: ROBERT GULBIS

Response to Comment Ind 683-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 683-2

The comment does not directly address the adequacy of the DEIR. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 16 – Drought and Climate Change, Master Response 33 – Groundwater Dependent Vegetation, and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 683-3

The comment does not address the adequacy of the DEIR. Please see Master Response 3 – Operator Responsibility. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 684

From: Robert Gulbis
To: BOS Public Comment
Subject: no mine
Date: Tuesday, February 1, 2022 12:00:31 PM

Dist 4

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

Ind 684-1 As a long term resident of Nevada County, I would like to express my very clear opposition to reopening the Idaho Maryland mine. There are numerous reasons why I feel this way, and implore the BOS to reject any proposal to reopen this mine.

Ind 684-2 Most obvious to me, is the draining and potential pollution of the groundwater. At this time of unprecedented wildfire danger, pumping millions of gallons of groundwater per day and flushing them down the river seems to be one of the worst ideas ever presented. If the forest has been suffering from drought, this will compound the danger many-fold.

Ind 684-3 The other major concern I have deals with the track record of this firm and its CEO. They have had numerous violations regarding environmental stewardship. As a landlord, when doing due diligence about potential tenants, if I contact a former landlord who tells me the tenant trashed the property I disqualify the application. This CEO will try to sweet talk you about his/their intentions, do not be swayed as this is lip service & nothing more. This leads to another significant concern, which is that this is not a local company. These people will be taking the lion's share of any profits away from this region, permanently. Yes there will be some new jobs for as long as certain profit margins are met. But those jobs will pay a fraction of what is being siphoned out of the project. And then when the project ends they will turn tail and leave without ever looking back. The only evidence of their presence will be damage to the environment and prolonged legal entanglements trying to make the owners be held fully accountable. The defense team will be paid for by what was once Nevada County gold, while the prosecution will be underfunded due to the economic impact of the mine re-closing.

Please reject this proposal and take the option of re-opening the Idaho Maryland mine off the table. This is a choice of basic decency.

Sincerely,
Robert Gulbis

INDIVIDUAL LETTER 684: ROBERT GULBIS

Response to Comment Ind 684-1
Please see Response to Comment Ind 683-1.

Response to Comment Ind 684-2
Please see Response to Comment Ind 683-2.

Response to Comment Ind 684-3
Please see Response to Comment Ind 683-3.

Individual Letter 685

To: Members of the Nevada County Planning Commission, Nevada County Board of Supervisors, and Nevada County Planning Department Staff
Attn: Matt Kelley, Senior Planner

Comments on the Draft Environmental Impact Report for the Idaho-Maryland Mine Project

4/3/22

To All Concerned:

The noise issues associated with the reopening and operation of the Idaho-Maryland mine are, by their nature, localized around the immediate surroundings of the Brunswick mine property, the Centennial disposal site and the trucking routes from the Brunswick to the Centennial site (and future, unnamed disposal sites).

Ind 685-1

The noise concerns listed in the DEIR are the preparation and construction noise at the Centennial site and at the Brunswick site, and the construction noise generated by installing a water main along East Bennet to insure four local well owners' continued water.

Noise is referenced with respect to 1) the source, and 2) the distance to 'The Nearest Receptor'. According to the County General Plan, Table 4.10-4 notes:

A) Compliance with the above standards shall be determined by measuring the noise level based on the mean average of not less than three (3) 20-minute measurements for any given time period Additional noise measurements may be necessary to ensure that the ambient noise level is adequately determined.

B) Where two different zoning districts abut, the standard applicable to the lower, or more restrictive, district plus 5 dBA shall apply.
C) The above standards shall be measured only on property containing a noise sensitive land use as defined in Policy 9.8 and may be measured anywhere on the property containing said land use. However, this measurement standard may be amended to provide for measurement at the boundary of a recorded noise easement or as determined in a recorded letter of agreement between all affected property owners and approved by the County.

Rise has chosen to measure the ambient sound levels of the 'Nearest Receptors', the neighboring parcels, at the property owner's dwellings, which are located at the greatest distance from the source of the sound. The true impact on those parcels of construction noise and ongoing operations, however, can only be determined by measuring at the property boundary.

According to the County General Plan, table 4.10.4, the decision to measure at this boundary is a County decision, so I ask the County to require Rise Gold to reassess the ambient and project noise levels on that basis.

Ind 685-2

Additionally, the ambient sound levels measured and used for this study date back to 2017/18. This is inaccurate data. The ongoing consequences of this project will not be known until after initial construction has finished and operation of the mine commences, easily 4 to 5 years in the future. I suggest that this analysis predicts only short-term sound level impacts, and does not adequately describe long term impacts to the local community, or to the larger community along the haul routes for mine waste.

Ind 685-3 The study should look at projected future neighborhood growth and make a reasonable evaluation of additional noise in the context of the future ambient conditions in which the mine will be operating.

Ind 685-4 The study describes in detail how the sound mitigation by terrain and ground cover will contribute to the mitigation of sound in the local neighborhood, and relies on these values for its conclusions, but does not address the time when the waste platform rises above the surrounding foliage and subjects the neighborhood to the direct, unobstructed noise of the fill and compact operation. PGS 762 - 769

Ind 685-5 The study says: (pg. 764

"Assuming a bulldozer, grader, excavator, front-end loader and compactor were operating concurrently at the Brunswick and Centennial Industrial Sites during site preparation, the combined noise exposure from the effective noise center of those operations would be 85 dBA Leq and 85 dB Lmax at a distance of 50 feet from the operations. However, the earthmoving equipment would be at various locations on the project sites rather than grouped in a small portion of the sites. To provide a
conservative but reasonable assessment of project construction noise generation at the Brunswick and Centennial Industrial Sites, it was assumed that all of this equipment could be operating concurrently, but that the equipment would be spread
out over the sites during the site clearing/construction operations. As a result, average noise levels were predicted for the Brunswick and Centennial Industrial Sites preparation activities assuming the noise sources were distributed throughout the sites, whereas maximum noise levels were predicted based on the closest proximity of the equipment to the sensitive receptor locations."
This combined sound level would also be true of the later fill and compact operations at the Centennial and Brunswick sites.

This seems is a false assumption, since these machines work jointly to accomplish their task, and would sometimes be operating in close proximity.

Additionally, the suggestion that both the average and the maximum sound levels would be the same, 85 dBa. says that the noise would be ongoing and continuous. Acceptable daytime noise levels of 75dBa would still be like standing next to a busy freeway. This is a major change to a quiet neighborhood, even if it lies within County defined limits.

Page 786 of the DEIR describes a sound monitoring plan to evaluate the mitigation results of the operation. It says:

"If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed."

Ind 685-6

At this point, Rise will have sunk several million dollars into construction and development costs prior to starting operations. Are we to believe that they will just shut down until they can solve the problem, or will they continue to operate and pay fines levied as 'cost of doing business'? Safeguards should be put in place...

In fact, sound level calculations for the DEIR Table are based on values for construction noise from The FHWA Roadway Construction Noise Model (RCNM), and shown in Table 4.10-10. These values differ substantially from sound levels shown in the Noise Navigator Sound Level Database, published by the University of Michigan Department of Environmental Health Science. For example, where the RCNM shows Compactor and Front End Loader sound levels at 80dBa, the Noise

Ind 685-7

Navigator chart lists them as 92 and 93dBa. An Earth Scraper in Table 4.10-10 is listed at 85dBa. In the Noise Navigator chart, it is 107 to 111 dBa.

This calls into question the integrity of the analysis, since the actual machines to be used, the true sound levels of those machines, the real numbers of those machines in use at any given time, and their locations around the working locations at any given time are not actually known.

Other questions to consider –

There will be daytime noise levels resulting from haul trucks to and from the Brunswick site from 6:00AM to 10:00 PM, 7 days a week for 80 years. Do we want this in what is now a quiet, residential neighborhood? What happens to quiet, summer evenings on the back deck and sleeping in on Sunday morning? This is industrial city scheduling, not quiet countryside living.

The period of time from the Wright Bros flight to the moon landing was 66 years. A great deal changed during that time. This project is asking for an 80 year permit. Do we really want to lock Grass Valley and Nevada County into an unchanging heavy industrial existence for substantially longer than it took to get to the moon, while the world changes around us?

Ind 685-8

We live now in a quiet, rural neighborhood. Despite the DEIR's denials, there IS wildlife living on our property and the mine property. Deer wander the neighborhood freely. There is a resident owl who hoots softly in the evening. We have a neighborhood bear that visits from time to time. The operation of this mine will drive wildlife away, and that and the associated noise will totally change the character of the neighborhood - and much of Grass Valley - from a peaceful rural setting to a noisy, urban/industrial complex totally unlike it is today.

Regards,

Robert Hubbard
12966 Mink Court
Grass Valley, CA 95945

INDIVIDUAL LETTER 685: ROBERT HUBBARD

Response to Comment Ind 685-1

The comment is substantively the same as Comment Ind 617-5. The commenter is directed to Response to Comment Ind 617-5.

Response to Comment Ind 685-2

The initial part of this comment is substantively the same as Comment Ind 617-4. The commenter is directed to Response to Comment Ind 617-4. With respect to the evaluation of long-term noise impacts, noise generated by the mining and processing components of the project would not change appreciably over time. Following completion of the engineered fill operations at both the Brunswick and Centennial sites, fill material would be hauled off site. Those future operations were evaluated in DEIR Impact 4.10-3 (Long-Term Off-Site Traffic). In addition, as future growth in the area unrelated to the project occurs, ambient traffic noise levels will increase incrementally while noise from the project would not. As a result, the project's contribution to the overall future ambient noise conditions would actually be lower compared to near-term ambient conditions.

In addition, out of an abundance of caution, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Mitigation Measure 4.10-2 also requires quarterly noise monitoring by the County's third-party noise consultant during the first five years of project operation, and once per year thereafter for the life of the project.

Response to Comment Ind 685-3

Commenter suggests that the DEIR needs to study future growth and increased future ambient noise conditions. Anticipated future ambient noise levels, including planned growth and the proposed project, are discussed in DEIR Impact 4.10-6. As future non-project related growth in the area occurs, traffic noise levels will increase incrementally as a result of that growth, while noise generated by the project would remain unchanged over time. As a result, the project's contribution to the overall future ambient noise conditions would be lower compared to near-term ambient conditions. In other words, as background noise increases due to future non-project neighborhood growth, that increase in noise will provide greater masking of project noise compared to existing ambient noise conditions.

Response to Comment Ind 685-4

The ultimate elevations of the engineered fill areas were included in the three-dimensional noise modelling conducted for the environmental noise analysis. As a result, the condition referenced in this comment was accounted for in the DEIR impact assessment. The commenter is referred to page 6, last paragraph, of the project's Noise and Vibration Assessment (DEIR Appendix L). Additionally, the commenter is directed to Response to Comment Ind 617-6.

Response to Comment Ind 685-5

This comment is substantively the same as Comment Ind 617-7. The commenter is directed to Response to Comment Ind 617-7.

Response to Comment Ind 685-6

The project's requirement to comply with the County's adopted noise standards is neither arbitrary nor optional. Approval of the project by itself would not permit the project to generate noise levels in excess of those standards, regardless of how much investment the applicant has made in the project. Because the project does not yet exist, it is impossible to measure the noise generated by the equipment operating at the site prior to the project being approved. Rather, it is necessary to model the noise generation of the proposed project as accurately as feasible to evaluate impacts based on those modelling results. DEIR Mitigation Measure 4.10-3.2 requires implementation of a comprehensive noise monitoring program to ensure that the project's noise levels satisfy the County's noise standards once the project is operational and monitoring can be conducted. The requirements of the measure are summarized in Response to Comment Ind 685-2 above. Contrary to the assertions made by the commenter, the noise measurements will provide a safeguard for the residents, the County and the applicant in ensuring the project's noise generation will be maintained at acceptable levels. Additionally, commenter is directed to Response to Comment Ind 617-9.

Response to Comment Ind 685-7

This comment is substantively the same as Comment Ind 617-8. The commenter is directed to Response to Comment Ind 617-8.

Response to Comment Ind 685-8

Commenter is concerned with daytime noise levels, length of the permit, and impacts to wildlife and quality of life. Regarding quality of life, please see Master Response 1 - Non-EIR/Administrative Issues. Noise impacts associated with project traffic on both Brunswick Road and Whispering Pines Lane were evaluated in the DEIR and determined to be less than significant (see DEIR Table 4.10-16). Impacts to special-status wildlife species were also evaluated in the DEIR and found to be less than significant or less than significant with mitigation measures implemented (see DEIR Impact 4.4-2 and Impact 4.4-4). Existing sensitive receptors, including 30 surrounding residences, were chosen as the nearest potentially affected receptors to the project sites. (DEIR p. 4.10-4 and Figure 4.10-2.) Because this comment is editorial in nature, and does not address the adequacy of the EIR, no response is warranted.

Individual Letter 686

From: Bill Jewel <12bearfarm@gmail.com>
Sent: Sunday, April 3, 2022 2:47 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: mine

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- Hello from the Jewels at 11948 E Bennett rd.

  I have a few concerts with the reopening of the mine.

Ind 686-1

If Mr Mossman and his organization want this to happen then put up all capital needed to address these issues.

The groundwater model has fundamental flaws in the initial start point and baseline data assumptions – all of which throw off the entire analysis.

fix the model so that it is correct.

- Dealing with mine waste – Asbestos will be a huge and expensive problem that requires far more comprehensive management than described in the report.

Ind 686-2

get an qualified estimate of the cost of this and then multiply it by 50 and put this money in escrow to deal with it

- Greenhouse gas emissions - The report excluded elements that would put the project over an arbitrary threshold limit, but recent climate change goals say the threshold should be "net zero".

Ind 686-3

it would be great to have zero emissions but we all know that will never happen

- Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 686-4

before any new mine operations are to begin any and all toxic issues on any proposed sites WILL BE cleaned up. get a qualified estimate for this and multiply this by 100 and put it in escrow. having dealt with hazmat clean up in my time it always seams to fall back on the government when the money is short and the compny files Bankrupcy. Again no new work starts until all prework is complete

Ind 686-5 - Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 686-6 - The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

1

all working needs to be done during regular business hours.

Ind 686-7

- Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a moisture cloud plume that could be created by warm, saturated air ventilation.

readdress this

Ind 686-8

- Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

bring this into compliance

Ind 686-9

- The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

address this

Ind 686-10

- Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions.

needs further investigation

Ind 686-11

well water

We received a beautiful letter from RISE GOLD going on about how since my property will need to be shifted to NID water and that they have estimated the cost to be $85k i would like to know about line routing and the disruption on my property while this is under construction. Again just another number thrown out to make me feel good.

Also since i would be moved to NID will I be subject to water cutbacks due to dry years. Reason I ask this is we are building homes in the Brunswick Basin area and NID is selling our water to Roseville as I understand.

Roadways.. since there will be no tax benefit from the mining operations to the county will there be a roadway repair fund to cover the ongoing costs of upkeep? We will need this.

Let me be clear that the Jewels don't want the mine to reopen.

But if all conditions are met and Mr Mossman and company put up all the required funds and do all the front end work before starting any mining activity then I guess it may happen.

Robert and Victoria Jewel

2

INDIVIDUAL LETTER 686: ROBERT JEWEL

Response to Comment Ind 686-1

The commenter states that the groundwater model is flawed in the initial start point and baseline data but provides no specifics as to the flaws. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Ind 686-2

The commenter states that asbestos will be a huge and expensive problem that requires more management than described in the DEIR and the money for management should be put in escrow. However, the Health Risk Assessment is based on conservative assumptions that likely overestimate asbestos exposure. The commenter is referred to Master Response 22 – Conservatism used for Asbestos Assumptions.

As stated on page 4.3-42 of the DEIR, use of the NSAQMD's cancer and noncancer thresholds to assess health risk significance for CEQA is consistent with AB 2588 risk assessment procedures. The threshold of significance for health risk is an increased cancer risk of >10 cases per million persons. The Health Risk Assessment prepared for the project concludes that the health risk to the most sensitive receptor will be below this threshold.

Nevertheless, the DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Notably, compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the EIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

Response to Comment Ind 686-3

The commenter states that the DEIR excluded elements that would put the project over a net zero threshold. The commenter is referred to Master Response 28 - Greenhouse Gas Credits.

Response to Comment Ind 686-4

The commenter states that the remedial cleanup of the Centennial Industrial Site must be included in the DEIR. The commenter is referred to Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 686-5

The commenter states that construction schedules missing from the DEIR skew the analysis for other impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

Response to Comment Ind 686-6

The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise of dumping mine waste near residential neighborhoods and that all work needs to be done during regular working hours. However, nighttime noise and dumping of mine waste is analyzed in the DEIR and is less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR and Responses to Comments Grp 21-130 and Grp 21-131.

Response to Comment Ind 686-7

The commenter states that the DEIR must account for air traffic hazards and aesthetic impacts due to the likelihood of a moisture cloud plume. The commenter is referred to Response to Comment Grp 7-95.

Response to Comment Ind 686-8

The commenter states that the DEIR inadequately demonstrates that the project's impacts to biological and aquatic resources are less than significant. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 686-9

The commenter states that the DEIR does not demonstrate the impact to biological and aquatic resources would be less than significant but provides no further details. The commenter is referred to Chapters 4.4 (Biological Resources) and 4.8 (Hydrology and Water Quality) of the DEIR. The commenter is also referred to Master Response 30 - Biological Study Technical Adequacy, Master Response 32 - Temperature of Mine Water Discharge, Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 686-10

The commenter states that DEIR uses meteorological data that does not reflect local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Ind 686-11

The commenter states his family would like more information regarding the connection of homes to NID. The engineering details of line routing to individual properties will be determined during the engineering of the potable water line as required by Mitigation Measure 4.8-2(c). Engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) Homes in the E. Bennett Road area which are connected to NID potable water under the project Well Mitigation Plan would be subject to any NID drought restrictions imposed on its customers.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 687

From: Bob Rhodes
To: BOS Public Comment
Subject: Comment on Rise Grass Valley
Date: Thursday, February 17, 2022 1:03:19 PM

Dist 1

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Dear Supervisors,

Please do not approve the Rise Grass Valley Conditional Use Permit and Reclamation Plan for the Idaho Maryland Mine. I've lived here for 37 years, and I can't find one person who wants to see the mine reopened. I can't understand how the Supervisor's Board can even consider it.

Ind 687-1

Respectively,

Robert J Rhodes
117 Walrath Ave
Nevada City, CA 95959

Bob Rhodes
rjr@sbbmail.com
530-263-0229

INDIVIDUAL LETTER 687: ROBERT RHODES

Response to Comment Ind 687-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 688

From: Alice Root
To: Idaho MMEIR
Subject: Opposed to Risegold mine proposal
Date: Saturday, February 12, 2022 7:16:06 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attn Matt Kelley:

Ind 688-1 I am a thirty plus year resident of Nevada County, living in Rough & Ready. Though we were in part drawn to Nevada County because of gold mining, we are opposed to this new mine proposal. We don't live near the proposed mining site, but think this is a terrible idea, at the wrong time and place. If it were proposed out in an unpopulated area, it might be somewhat viable, but to place this in the residential area of Grass Valley is horrific. The traffic and noise would be enough of a deterrent, but the

Ind 688-2 environmental impacts beyond this do not make this a reasonable proposal. Also, this company is financially unstable, and out of the country. Please do not approve this proposal.

We vote in every election, and will vote and campaign against any supervisor that would

Ind 688-3 approve this.

Sincerely,

Robert Root
Rough & Ready, CA

INDIVIDUAL LETTER 688: ROBERT ROOT

Response to Comment Ind 688-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 688-2

The comment does not directly address the adequacy of the DEIR. Please see Master Response 1. For general traffic concerns, please see Chapter 4.12, Transportation; for general noise concerns, please see Chapter 4.10, Noise and Vibration.

Response to Comment Ind 688-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 689

Mr. Matt Kelley
Senior Planner
Nevada County Planning Dept.
950 Maidu Ave. Suite 170
Nevada City, CA 95959-7902

April 3, 2022

Re: EIR Comment: Rise Gold Project

Please accept this comment on the IMM Draft EIR, Vol. 1, Ch. 4.10 (Noise) and insofar as it affects noise, Ch. 4.12 (Transportation).

I previously made a short general comment through the Mine Watch site, reserving my right to comment here.

Ind 689-1

The Draft EIR does **not adequately** serve as a CEQA (California Environmental Quality Act) informational and disclosure document. It appears to be drafted to reach a pre-ordained conclusion, which is that no significant impacts could exist from the Project. This conclusion is startling. It strains the imagination that such a Project could exist both adjacent to, and within, an urbanized area and not have at least some significant impacts.

A draft EIR is supposed to highlight significant impacts. That way, the final decision can be made to approve or disapprove in light of those impacts. When a draft EIR fails in this regard, it fails in its purpose to assist decision-making and becomes legally vulnerable to challenge. Challenges under CEQA frequently result in a court order to re-draft the Final EIR.

The draft EIR states that "audibility"--the very perception of sound--is to be categorically dismissed as a significant impact. So if Greater Grass Valley hears industrial and truck noise, the phenomenon cannot be significant, almost by definition. This conflicts with the common sense notion that <u>any noise</u> above quiet is very significant. A quiet neighborhood that experiences distant noise is going to be a less-than-quiet neighborhood, and less desirable.

Grass Valley's topography is such that distant sounds reverberate or echo and can be heard most places. For example, if one is atop Chester St., one can hear noise from the freeway, Main St., and even the Fairgrounds. Instead of asking what impact the Project will have on streets like Chester, the draft EIR is silent.

Ind 689-2

The draft EIR explains that the dBA scale is logarithmic, such that each level of noise can be multiple times greater than the previous level. Yet the graphic to

1

demonstrate this is represented as a thermometer in which the gradations move up from non-logarithmically from the 40 dBA of a quiet residential area to 70 (busy traffic) to 80 (busy street) to higher noise levels that are dangerous to hearing, such as chainsaws at 110 dBA.

Conveniently, the draft EIR finds that at selected monitoring sites, the dBA level will not be a significant increase in the otherwise prevailing sound. Between 7 a.m. and 10 p.m., Project operations will definitely be heard, but that would not be significant? Some 30 sensitive receptors are positioned around the Project site, but not much further away. The furthest out are 3 on Tinloy St. adjacent to the freeway, where noise is considerable and the Project's impact is perhaps less noticeable.

Ind 689-3

The monitoring sites in Table 4.10.2 are then reduced to only eleven. Given Grass Valley's topography and spread of residential areas, the monitoring should be much more extensive. Actual noise from large fully loaded trucks should be captured and recorded throughout the main residential areas of Grass Valley. I am convinced that most residents would find annoying and significant the roar of Project trucks in the morning from 7 – 10, and at night from 7-10. Those are the 6 hours during which I have perceived from sound from distant locations.

The Project is forecast to last 80 years. Noise generation lasting over an 80 year span is significant! Recall that in the past, Grass Valley heard stamp mills going 24-7. No one now wants to endure anything remotely like that. The effect on the local economy could be bad, discouraging tourism and depressing home sales.

Ind 689-4

The Project is not a good fit in its location. Grass Valley is already a very noisy town, but the Project should not be able to camouflage the Project's impact by saying that the Project's **increase** in noise is not significant.

My hope is that the County of Nevada will reject the draft EIR and insist on additional noise studies and analysis before approving a Final EIR. These studies should monitor sound from sites located all over the Grass Valley area, replicating what the actual Project noise will be, and how it will be perceived.

Thank you for receiving this comment.

Sincerely,

/s/
Robert Shulman

Property owner in Grass Valley, 227 June Dr.

INDIVIDUAL LETTER 689: ROBERT SHULMAN

Response to Comment Ind 689-1

Commenter disagrees with the conclusions of the DEIR and asserts that any noise is significant. The Project Applicant has proposed to incorporate project design elements to mitigate potential noise impacts by enclosing virtually all processing-related equipment and processes into insulated buildings, and through limitations on hours of operations of certain noise-generating activities which cannot practically be enclosed (i.e., engineering fill operations, transport of fill material to the Centennial Site, etc.). (DEIR pp. 4.10-38 and 4.10-24.) The analysis recognizes that substantial noise control measures will be required to be built into the project design to achieve this objective, and the applicant has committed to incorporate such noise control measures. (Id.) A comprehensive noise monitoring program will be required as a condition of project approval to ensure that the appropriate noise-control measures have been implemented to ensure satisfaction of the County's adopted noise standards. (DEIR 4.10-50.)

The commenter is correct that the purpose of the EIR is to disclose potential impacts of a project. However, as stated in DEIR Section 4.10.4 under “Standards of Significance,” CEQA guidelines Appendix G clearly states that, for a noise impact to be considered significant, the increase in noise resulting from the project must be substantial. A substantial increase in noise is defined in DEIR Section 4.10.4 under “Traffic Noise Increase Criteria.” As discussed on page 5 of the project’s Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility is not used as a significance criteria in evaluating noise impacts. In addition, a noise source can be audible without a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project’s noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

The noise prediction model used to quantify the transmission of sound from the project area to the surrounding areas accounts for topography, atmospheric conditions, ground cover, shielding by intervening buildings, noise attenuation provided by building walls and ceilings, and vegetation (see pages 5-7 of DEIR Appendix L). Local topographic survey data was imported to develop a 3-dimensional model of not only the project site but the surrounding neighborhoods as well. (DEIR 4.10-23.) Reverberation (echo) can occur when sound impacts a reflective surface. However, vegetated ground with extensive tree cover, such as that present in the project vicinity, tends to be acoustically absorptive rather than reflective. (DEIR 4.10-24.) Where sounds can be heard over long distances, that phenomenon is frequently attributable to either a lack of intervening topography, vegetation, and ground cover between the source and receiver, or atmospheric conditions conducive to sound propagation. Such conditions are not anticipated to occur due to reflections or echoes at locations with soft ground, irregular topography, and extensive tree cover.

Response to Comment Ind 689-2

Commenter believes the graphic representing the dBA scale is non-logarithmic, while the dBA scale is logarithmic. The graphic referenced in this comment (Figure 2 of project Noise and Vibration Study, DEIR Appendix L), depicts a linear range of sound pressure levels (in decibels), and typical noise sources associated with those noise levels. Although the graph is linear, the

pressures impacting the human eardrum required to generate the decibel levels shown are nonlinear. For example, a decibel level of 70 dB has 10 times more sound pressure energy impacting the eardrum than a decibel level of 60 dB; 100 times more sound pressure energy than a decibel level of 50 dB; and 1,000 times more sound pressure energy than a decibel level of 40 dB. For this reason, decibels cannot be added or subtracted, multiplied or divided without first converting the decibels into sound energy using exponential formulas. Once the arithmetic operations have been applied to the energy, the base-10 logarithm is taken to convert the energy back to decibels. For this reason, 50 dB + 50 dB = 53 dB, not 100 dB.

Response to Comment Ind 689-3

The commenter believes any sound is significant, disagrees with the monitoring sites and believes sound is most significant from the hours of 7-10 am and pm. As noted in the Response to Comment Ind 689-2 of this letter, audibility is not the test of significance for a finding that a project would result in a noise impact. CEQA requires a “substantial” increase in ambient noise levels for a finding of significance, not merely an audible change. Ambient conditions at residences close to and far from the project area vary, as noted by the ambient noise survey results presented in Appendix L of the DEIR. Those ambient conditions were evaluated in the project's noise analysis to ensure that the CEQA criteria were appropriately applied.

The 12 noise monitoring locations identified on DEIR Figure 4.10-3 were specifically selected to be representative of baseline noise exposure of the nearest residences to both the Brunswick and Centennial project sites, and representative of sensitive receptors located along the project's proposed haul routes. Because sound decreases with distance, industry standard convention is to evaluate ambient conditions and potential noise impacts at the nearest sensitive receptors to a project's noise-generating areas. If impacts are not identified at the nearest receptors, it is reasonable and logical to conclude that impacts would not occur at substantially more distant receptor locations. Therefore, monitoring of ambient conditions at receptors located a considerable distance from the project site is typically not required. DEIR Figures 4.10-7 and 4.10-8 indicate that the project's noise generation is projected to be limited to areas in relatively close proximity to the Brunswick Site. Commenter states that “actual noise from large, fully loaded trucks” should be captured in the noise study. Heavy truck activity is common in the project area so the project would not be introducing heavy truck traffic noise into an area where such noise is currently absent. As indicated in Table 9 of the project noise study (DEIR Appendix L), off-site hauling would occur between the hours of 6 am and 10 pm. Given a projected average of 50 heavy truck round trips per day (100 individual passbys), the typical average number of hourly truck passbys on the local roadway network computes to approximately 6 per hour, or one truck passby every 10 minutes during typical operations. The noise generation of heavy trucks operating within the project area were modelled using the Federal Highway Administration Highway Traffic Noise Prediction Model, which is based on an extensive database of the noise generated by all vehicle categories, including heavy trucks. Those modelling results indicated that project-generated heavy truck traffic noise levels would not result in significant adverse noise impacts.

Response to Comment Ind 689-4

This comment raises a concern with the length of the project permit, tourism and economic factors. Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts. The timeline of the project does not affect the evaluation of the project's noise impacts or findings of significance for any identified impacts. This is because the County's noise standards state that the project cannot exceed the specific noise level limits during

any individual hour of any day, regardless of the week, month, or year during which the project is operational.

The ambient noise environment within the cities of Grass Valley and Nevada City varies, depending mainly on proximity to major roadways. At residences located near Highways 49 and 20, ambient noise levels are higher than at residences removed from busy roadways or other noise sources. For this reason, a focused ambient noise survey was conducted in proximity to the nearest residences to the project area to ensure that the impact evaluation properly accounted for baseline ambient conditions.

The portion of this comment pertaining to noise monitoring is similar to Comment 689-3 of this same letter. The commenter is referred to the response to that comment.

Individual Letter 690

From: Bob & Ann Thorpe <bathorpe@hughes.net>
Sent: Monday, April 4, 2022 4:51 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine

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Ind 690-1 Please be advised that as eighteen year residents of Nevada County we most definitely oppose the reopening of the Idaho-Maryland Mine.

The following are our concerns:

1) Toxic waste site pollution

Ind 690-2 2) Harmful chemicals leaching into the aquifer

Ind 690-3 3) Noise pollution both from the mining operation and trucks breaking down our roadways

Ind 690-4 4) Large scale mining in this day and age is not compatible to the quality of life in our community

Ind 690-5 5) Traffic congestion impact

Ind 690-6 6) Draining of nearby wells

Ind 690-7 7) The quality of life verses the exploitation of the environment does will not benefit this community

Concerned citizens,

Robert and Ann Thorpe

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INDIVIDUAL LETTER 690: ROBERT AND ANN THORPE

Response to Comment Ind 690-1
The commenter's reference to "toxic waste site pollution" lacks specificity. It is unclear whether the commenter is referring to existing site conditions or potential effects of the project on the sites. Please see Master Responses 1, 2, and 8 through 11, as well as the discussions and analysis in Chapter 4.7, Hazards and Hazardous Materials, of the DEIR.

Response to Comment Ind 690-2
The project will not result in harmful chemicals leaching into the aquifer and the commenter provides no evidence to this effect. Please see Master Responses 1, 8, and 35, as well as the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR.

Response to Comment Ind 690-3
Please see Master Response 1, as well as the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR.

Response to Comment Ind 690-4
As discussed in Master Responses 1 and 2, quality of life concerns are outside the scope of CEQA.

Response to Comment Ind 690-5
Please see Master Response 1, as well as the discussions and analyses in Chapter 4.12, Transportation, of the DEIR.

Response to Comment Ind 690-6
Please see Master Responses 1 and 15.

Response to Comment Ind 690-7
Please see Master Responses 1 and 2 – quality of life concerns are outside the scope of CEQA. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 691

From: Bob Wheatley <robertwheatley1099@gmail.com>
Sent: Saturday, April 2, 2022 1:06 PM
To: Idaho MMEIR
Cc: Karin Wheatley; Paula Strang; KIM DERBY; GEORGIE K HUFF; DEIRcomments@cea-nc.org
Subject: Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report concerns

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10591 Salcido Lane

Grass Valley

CA 95949

916-412-5712 (Call/Text)

Dear Mr Kelly

Idaho-Maryland Mine Project SCH# 2020070378 Draft Environmental Impact Report

Ind 691-1 I am writing as a family member married to Karin Wheatley, who co-owns, with her three sisters, the property at 10591 Salcido Lane to express my concern on aspects of this project. Our property relies on well water as the domestic water supply and the property borders Wolf Creek in which I and other family members including very young children play and bathe. I am therefore alarmed to read the paragraph at 4.8 -51 which states the presence of ***"elevated arsenic levels that could pose a threat to human health"***. I then read the mitigation plan at 4.8-52 Para 4.8 1 (a) and I am concerned at the following

the absence of any disaster recovery plan should the water purification process fail,

Ind 691-2 the absence of a detailed description of the water purification process including redundancy and back-up process' in the event the primary system fails,

Ind 691-3 no mention of a "cease operation" provision in the event that water samples exceed acceptable limits. Such provision to remain in effect until acceptable standards can be demonstrated to the City and accepted by the City.

I request that the draft environmental impact report be revised/reissued to satisfactorily address the above concerns, the failure of which I would consider sufficient grounds not to allow the project to proceed.

Yours faithfully,

Robert Wheatley

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INDIVIDUAL LETTER 691: ROBERT WHEATLEY

Response to Comment Ind 691-1

The DEIR evaluates the potential for the proposed project to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality under Impact 4.8-1, which starts on page 4.8-41. Because the DEIR concludes that a potentially significant impact could occur, the DEIR requires Mitigation Measures 4.8-1(a) through 4.8-1(e), which would reduce potential impacts to a less-than-significant level. As provided by Mitigation Measure 4.8-1(a), the Project Applicant would be required to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-2016-0076; NPDES No. CAG995002), at least six months prior to construction of the water treatment system. The NOI would be required to include evaluation of potential constituents of concern, including arsenic and to demonstrate that the proposed water treatment plant (WTP) design would successfully treat mine water to meet the water quality standards and treatment goals identified in the Limited Threat Discharge order. Upon construction of the WTP, sampling would be provided to the RWQCB to demonstrate that the treated water meets the water quality standards and treatment goals specified in the Limited Threat Discharge order. Ongoing monitoring of treated water would occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek.

As stated on page 4.8-53 of the DEIR, consistent with NPDES Permit requirements, the WTP would have backup power source (i.e., generators) in the event of electric power failure or outage.

Response to Comment Ind 691-2

Please see Response to Comment Ind 691-1. Please refer to Appendix K.4, Water Treatment Plant Design Report, for a detailed description of the proposed treatment process.

Response to Comment Ind 691-3

Please see Responses to Comments Ind 691-1 and Ind 691-2. The water treatment plant and discharge of treated groundwater will be permitted by the State (CVRWQCB), who will have regulatory authority to stop mine operations if water quality samples exceed applicable limits.

Individual Letter 692

From: Robin DeMartini <rdemartini@protonmail.com>
Sent: Saturday, April 2, 2022 8:12 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: NO to Rise Mine

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Hello,

Thank you for this opportunity to express concerns re: The Rise Mine.

Ind 692-1 COMMON SENSE...

Why would our beautiful community agree to a toxic, noisy, messy, and poisonous Mine "re-opening"?

Hasn't the Past proven anything (asbestos, arsenic, heavy metals soil contamination, air and noise pollution)?

The Mine would be allowed to burden our roads with trucks going to and fro 24/7, creating noise, vibrations (affects humans, animals and birds), pollution, toxic dust, traffic and road/asphalt deterioration.

Ind 692-2 This would create a financial burden to repair said roads. Is Rise Mine going to pay for that, or Nevada County taxpayers?

Ind 692-3 And why is it OK for a Corporation to go against any noise ordinance that we (ordinary citizens) follow (keeping our music down, not using machines, leaf blowers and construction tools between certain hours)?

Ind 692-4 Why do big corporations get to bend all the rules while we take our old paint, oils, toxic materials, and recycling to specific recycle/removal businesses?

I am deeply concerned that this big corporation will allow their water to run off into the earth and nearby streams/creeks...

Ind 692-5 Do they have a new invention that proves that their water purification system is clean enough for us to drink/consume as it leeches into our streams and rivers, where fish swim and wildlife drink from?

Ind 692-6 What about the toxins in the Mine run-off traveling down through our farm lands, into our foods (we all took biology and know how plants depend on clean water, too, right)?

Ind 692-7 I researched how much water the Mine will use to flush the old mines, really, DURING A DROUGHT?

Ind 692-8 My biggest concern is that any burden this corporation creates - messy, broken up roads, pollution, noise, poisons, water contamination, threats to animals and birds, and citizen's wells - will end up being our problem to clean up for generations to come.

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The ripple effect is staggering.

I do find it inspiring to see our community come together as concerned citizens, free thinkers, and intelligent researchers to see this issue be debated and put down. This Mine needs to be stopped. NO to the Rise Mine!

Thank you,
Robin DeMartini
12434 Silk Tassle Cir
Nevada City, CA

Sent from ProtonMail for iOS

INDIVIDUAL LETTER 692: ROBIN DEMARTINI

Response to Comment Ind 692-1

The commenter opposes the project but does not discuss the adequacy of the DEIR. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Responses to specific comments are provided below.

Response to Comment Ind 692-2

The commenter states that the project will cause adverse traffic-related impacts such as damage to local roadways. The commenter states that the project will result in noise, vibration, and toxic dust but does not state how the DEIR is inadequate. Impacts from trucks are analyzed in Chapter 4.10 (Noise and Vibration), Chapter 4.12 (Transportation), Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy), and Chapter 4.4 (Biological Resources).

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between the project driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Response to Comment Ind 692-3

The commenter implies that the project would exceed local noise ordinances. The DEIR analyzed noise impacts in Chapter 4.10. With the exception of the installation of a potable water line along East Bennett Road, noise impacts would be less than significant after mitigation. (DEIR, p. 4.10-31.)

Response to Comment Ind 692-4

The commenter implies that the Project Applicant will violate environmental standards governing the project but does not state how. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other State and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 692-5

The commenter is concerned about stormwater runoff from the project sites and the quality of the water discharged to South Fork Wolf Creek. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 692-6

The commenter states that runoff from the site and/or discharges to South Fork Wolf Creek will contain contaminants. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 692-7

The commenter is concerned about the project's impacts to groundwater supplies during a drought. The DEIR analyzed hydrology and water quality impacts in Chapter 4.8 of the DEIR and found impacts to be less than significant after mitigation. The commenter is also referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 692-8

The commenter states that any adverse impacts from the project will be shouldered by the County after the project's completion. However, the commenter does not state how the DEIR is inadequate. The impacts that the commenter is concerned with (road damage, water pollution, wildlife, and groundwater) are discussed in the DEIR, the commenter is referred to Chapter 4.12, 4.3, 4.10, 4.8, 4.4 of the DEIR.

Individual Letter 693

From: Robin Ehlers <robinehlers@comcast.net>
Sent: Saturday, April 2, 2022 9:36 AM
To: Idaho MMEIR
Subject: No mine is worth the cost

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Ind 693-1

I am writing to voice my opposition again to the idea of a private company damaging use of land for financial gain. The water table below our land is a necessity to life of this entire community. The thought of a corporation utilizing this water at the risk to every other user of this water is absurd. The EIR is flawed and seems skewed to favor this endeavor. The model has fundamental flaws from inception corrupting the entire analysis. It is time for us as a community to protect and cherish our resources...air...water..dirt...and not contaminate it for the financial gain of a few. It is far beyond time to be the stewards of this earth that we are called to be.

Robin Ehlers

1

INDIVIDUAL LETTER 693: ROBIN EHLERS

Response to Comment Ind 693-1

The comment expresses a general opinion that the DEIR is flawed and skewed to favor the proposed project, but does not provide specific examples that would allow for a detailed response. Regarding dewatering concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For general air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

Individual Letter 694

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Idaho.MMEIR@co.nevada.ca.us

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 30, 2022

Re: Idaho-Maryland Mine Reopenning Project, DEIR Comment: Inadequate Mitigation of Wild Fire Danger

The greatest Rise Gold Mine negative impact affecting wildfire is the trucking and traffic that this heavy industrial complex would add to the evacuation of the populace in the event of a fire in the circulation area of the mine. This concern is included as one of the three impacts that are Significant after mitigations noted elsewhere in the DEIR.

Ind 694-1 Statements found on DEIR pages 4.13-1, 4.15-15 that state 50-100 trucks per day, carrying 20 tons of rock per truck, will be driving on Brunswick Road, classified as a "Minor Arterial" road, 16 hrs. a day, 7 days a week. The DEIR is inadequate by not considering the extremely significant impact on fire evacuation of that area.

Plus "up to 18 additional truck trips could occur per day for various operations" for five years, also for 16 hours a day, seven days a week. This 118 trips per day of trucks does not include personnel in their own vehicles. As stated in this DEIR, this will constitute approximately 7.4 hauling truck round trips per hour on Brunswick Road. This is a significant amount of additional traffic coming into the basin and intersection of Brunswick Road and State Route 20/49. In an evacuation in that part of the County will have evacuees in their vehicles coming from all points east of Highway 20/49 if SR 174 is closed. This area was a serious bottle neck with the Bennett Fire in 2021.

Ind 694-2 This will not "have a less than significant impact on emergency response plan or emergency evacuation plan", and yet no mitigation is required as stated on page 4.13-17. This must be changed to a "significant and unavoidable" impact on Transportation in spite of mitigations on the Brunswick and SR20/49 intersection. If no mitigation can be found, I believe that the Project must not be approved.

Ind 694-3 The DEIR also proffers wild fire mitigations for the Brunswick site including clear cutting -- "vegetation reduction"-- on 18.5 acres of the 58 acres of forest. On the Centennial site, 6.5 acres of the 10 acres of forest will be cut down. The environmental impact of a 25-acre clear cut has to be mitigated.

1

Ind 694-4 The report goes on to renumerate the fuel treatment projects far and wide in western Nevada County, which is of questionable relevancy especially since they are distant projects (some of which have been seeking funding for years).

Ind 694-5 Why is there an inclusion in the description, in this section of the DEIR, to install a potable water line for residents along East Bennett Road as an example of roadside fuel reduction? There is already a Right of Way on the road to install such a pipeline so what fuel reduction will be done in digging up the road? This potable water line has been proposed to be installed by N.I.D. and paid for by Rise Gold since the wells along this road are anticipated to be negatively impacted. Why is putting a water line in being used as an example of "fuel reduction" to reduce wildfire hazard? This section needs reconsideration.

Ind 694-6 Rise Gold's Fire Protection Plan needs to address the explosives that are being trucked in, that during a wildfire, if fire consumes the truck(s), and the explosives or the diesel tanks ignite.

Ind 694-7 Why does the DEIR include a "fire flow system" as support of mitigation to "less than significant" impacts and then state, page 4.13-20 paragraph 3, that it is not known if the old fire flow infrastructure used by the lumber mill, even meets CFC requirements? Please review this for validity.

Ind 694-8 The "comprehensive vegetation management plan" required by the County Fire Marshall's Office needs to be provided before the DEIR can be certified.

Ind 694-9 The DEIR states that the CAL FIRE station on Ridge Road could reach a theoretical fire at the mine within the 5-minute response time goal. The DEIR acknowledges the response time is "depending on local traffic conditions". Once again, the unmitigable and significant impact of traffic at Brunswick Road and SR 20/49 makes this significant and unavoidable.

Ind 694-10 There are several issues that I haven't covered in the comment, but these are sufficient to reject the DEIR. When it comes to wild fire danger, impacts that cannot be mitigated, but are significant and unavoidable render this project too dangerous to approve.

Sincerely,

Robin Hart

110 Berriman Loop

Grass Valley, CA 95949

530-271-7121 rhstarbird@gmail.com

INDIVIDUAL LETTER 694: ROBIN HART

Response to Comment Ind 694-1
The commenter states that the DEIR is inadequate because it fails to analyze project traffic during an emergency evacuation scenario. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 694-2
The commenter states that the DEIR's finding that Impact 4.13-1 as "less than significant" is incorrect and must be changed to "significant and unavoidable." However, the commenter does not provide evidence as to why the DEIR is inadequate in this regard. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 694-3
The commenter states that the removal of vegetation must be mitigated. The commenter does not state how the DEIR is inadequate. Impacts to vegetation communities are evaluated in detail in Chapter 4.4, Biological Resources, of the DEIR.

Response to Comment Ind 694-4
The commenter states that the "Fuel Treatment Efforts" section of the wildfire chapter is irrelevant to the DEIR. The purpose of Section 4.13.2, including Fuel Treatment Efforts, of the DEIR is to describe the existing wildfire setting in the project region as stated on page 4.13-1 of the DEIR.

Response to Comment Ind 694-5
The commenter asks why the installation of the potable water pipeline along East Bennett Road is included in the DEIR as an example of fuel treatment. The project does not propose to conduct fuel treatment along East Bennett Road. As stated on page 4.13-5 of the DEIR, with respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site.

Response to Comment Ind 694-6
The commenter states that the DEIR must address the possibility that a wildfire will ignite explosives being transported to the project site. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As this comment amounts to speculation, no further response is necessary.

Response to Comment Ind 694-7
The commenter asks why the DEIR describes the installation of a fire flow system at the Brunswick Industrial Site and then states that it is unknown if the existing fire flow system meets California Fire Code requirements. The fire flow system is not constructed yet. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The installation of the fire flow system for the project would be required to meet California Fire Code (CFC) requirements.

Response to Comment Ind 694-8

The commenter states that the comprehensive vegetation management plan described on DEIR page 4.13-20 must be provided to the County Fire Marshall before the DEIR can be certified. The commenter is incorrect. The vegetation management plan is not required to be submitted until improvement plans such as grading or building permit applications are submitted. Mitigation Measure 4.13-2 requires that in conjunction with submittal of Improvement Plans, the Project Applicant shall submit a comprehensive vegetation management plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the vegetation management plan during the project construction, operations, and reclamation activities. The mitigation measure has been formulated to include sufficient performance standards that must be met, in accordance with the requirements in CEQA Guidelines Section 15126.4(a)(1)(B).

Response to Comment Ind 694-9

The commenter states that the DEIR is incorrect in stating that firefighters from the CalFire Station on Ridge Road could respond to a fire at the project site within five minutes because of traffic impacts at Brunswick Road and State Route 20/49. The project does not create significant and unavoidable traffic impacts at Brunswick Road and State Route 20/49. The commenter is referred to DEIR Chapter 4.12 (Transportation).

Response to Comment Ind 694-10

The commenter states that the DEIR incorrectly assesses wildfire impacts as less than significant but does not provide any specific information or state how the DEIR is inadequate. Responses to specific comments are provided above. The commenter's opposition to the project is noted for the decisionmakers.

Individual Letter 695

From: robin_the-milams.com
To: CommunityDevelopment; Planning; Idaho_MMEIR
Subject: Idaho Maryland Mine EIR Public Review schedule
Date: Tuesday, January 4, 2022 8:33:13 PM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ind 695-1

Nevada County Planning staff,

I see that the EIR for Idaho Maryland Mine was just released. Please tell me that the public comment period will be extended by at least 30 days if not more.

Many residents and businesses do not have power or internet and will not for days or maybe even weeks to come. People and organizations are rightfully far more focused on recovery from this event and will lose several weeks if not a month of critical review time. The EIR release announcement is being buried by so many other priorities, that people do not have the cycles to review it properly at this point.

In fairness to all parties, an extension of the public review period is warranted.

Wishing you a safe, healthy, prosperous and sane 2022!

Robin Milam
Greenhorn/Lost Lake Road Community
530 263-1483

INDIVIDUAL LETTER 695: ROBIN MILAM

Response to Comment Ind 695-1

The public review period began on January 4, 2022 for a 60-day public review period, which was extended to April 4, 2022 for a total public review period of 91 days.

Individual Letter 696

From: Maman <r.katherine.res@gmail.com>
Sent: Monday, April 4, 2022 4:15 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine proposal

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Dear Commission:

My name is Robin Resovich and I am a resident of Grass Valley.

Ind 696-1 I am extremely concerned and disheartened to witness my community seriously considering going back in time to destructive mining practices. We should be moving forward economically and environmentally, not backwards. Our county has yet to fully recover from the ravages of our mining past.

Please do not allow this unenlightened project to move forward.

Thank you,

Robin Resovich

INDIVIDUAL LETTER 696: ROBIN RESOVICH

Response to Comment Ind 696-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 697

From: Ron Rosner
To: bdofsupervisors
Subject: proposed mine opening
Date: Tuesday, February 22, 2022 6:50:43 AM

Dist 1

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Ind 697-1

Dear Sirs/Madams,

Allowing the opening of the proposed Idaho-Maryland mine would be an unthinkable travesty. Ours is not an industrial community. The damage to the water table, and the pollution from the huge number of trucks expected, would greatly decrease the quality of life for those living here.

Please do the right thing.

Ron Rosner DVM
15737 American Hill Road
Nevada City

INDIVIDUAL LETTER 697: RON ROSNER

Response to Comment Ind 697-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2. Regarding water table concerns, please see Master Response 15. Regarding truck exhaust concerns, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 698

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Rolland Julie

Address: 14825 SONTAG ROAD, GRASS VALLEY 95945 CA

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

I am against the opening of the mine for the following reasons:

Ind 698-1 → Release of toxic chemicals in the aquaphere, air and surrandings environment.

Ind 698-2 → Impact on the water while experiencing a drought

Ind 698-3 → Lack of accountability in the impact of the same corporation in Canada

Ind 698-4 → Lack of knowledge about REAL environmental impacts (wells level, and efficiency for example)

Ind 698-5 → Against the noise pollution

Ind 698-6 → Against the industrial impact of the quality of life. (we chose to buy a house here for the sacred natural environment, not to be surrendered by industrial company)

INDIVIDUAL LETTER 698: RON AND JULIE

Response to Comment Ind 698-1
The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. The project will not result in release of harmful chemicals into the aquifer and the commenter provides no evidence to this effect. Please see Master Responses 1, 8, and 35, as well as the discussions and analyses in Chapter 4.8, Hydrology and Water Quality, of the DEIR.

Response to Comment Ind 698-2
Please see Master Responses 15 and 16.

Response to Comment Ind 698-3
Please see Master Response 3.

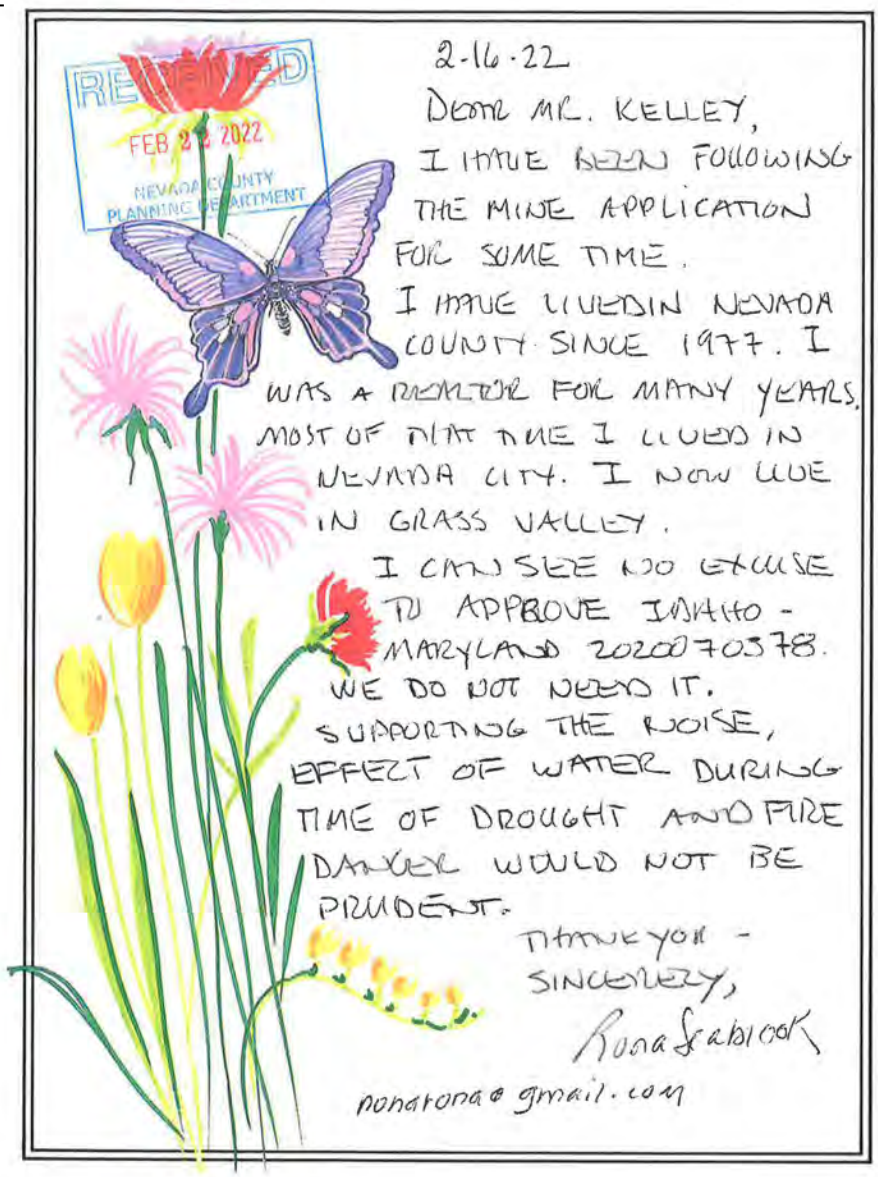
Response to Comment Ind 698-4
The comment expresses a general opinion that the commenter has not been given the opportunity to learn about the "real environmental impacts," but does not provide specific examples that would allow for a detailed response. For well concerns, please see Master Response 15.

Response to Comment Ind 698-5
For the general noise concerns, please see Chapter 4.10, Noise and Vibration.

Response to Comment Ind 698-6
Quality of life concerns are outside the scope of CEQA. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 699

Ind 699-1



INDIVIDUAL LETTER 699: RONA SCABLOOK

Response to Comment Ind 699-1

The comment does not address the adequacy of the DEIR. Please see Master Responses 1, 2, 6 (Wildfire Impacts), 15 (Adequacy of Groundwater Monitoring Wells), and 16 (Drought and Climate Change). The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 700

From: Ronald A Dow <rondow1@icloud.com>
Sent: Sunday, March 27, 2022 11:00 AM
To: Idaho MMEIR
Subject: I am strongly opposed to reopening the mine.

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Ind 700-1

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Ron Dow

1

INDIVIDUAL LETTER 700: RONALD DOW

Response to Comment Ind 700-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 701

RECEIVED

FEB 17 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Dist 1



RONDAL SNODGRASS

CONSULTATIONS

February 16, 2022

To the Nevada County Board of Supervisors

First District
Heidi Hall

Second District
Ed Scofield

Third District
Dan Miller

Ind 701-1

Fourth District
Susan Hoek

Fifth District
Hardy Bullovk

I respectively submit this letter of concern for your attention.

Thank you for serving our County,

Rondal Snodgrass

Rondal Snodgrass

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com

February 16, 2022

Open Letter to the Nevada County Board of Supervisors and Planning Commission

I have studied with much interest and concern about the application of Rise Gold to reopen the Idaho-Maryland mine. The potential environmental impacts are serious as are reported in the Draft Environmental Impact Report

In their application, Rise Gold is proposing extensive mining operations that could greatly alter the peaceful climate of Grass Valley, disrupt normal commerce, and re-create the very dangerous industry of underground mining.

When considering the viability of such a corporate development proposal it calls upon good business practices to ask for the credentials of the applicant, require proof of economic viability, a business history, and the resume of the representative leadership.

I have learned that Rise Gold is a speculative company. They have no business history. The present stockholders are gold investors throughout the U.S, Canada, off shore, and Wall Street. It is a company formed without capital needed for the project, but raised money through loans and stock sales to get the land, pay for EIR consultants and hire a public relations firm. Some commentators on gold driven companies say they mine stock value, and hope for gold. They are creating profits by manipulating value as they use government processes, and public relations. The permit if ever granted would multiply stock values. That permit could then be sold.

Ind 701-2

A glaring and shocking fact that I uncovered is that the Rise Gold's present CEO has previously been embroiled in a failed mine, financed in this same way, up in British Columbia. The corporation he managed, called Banks Island Gold Ltd, declared bankruptcy when the government ordered the mine closure. The mine's safety engineer became a whistle blower, sending photos of damage to government officials, bringing in helicopters and regulators. At that time there were 35 charges of failed compliance regarding environmental and safety standards. Court cases continue with fines and appeals of this CEO's role in the mine failure.

The mine is located on Banks Island, off shore from Prince Rupert, and is within territory of the Indian Gitxala Nation. They are outraged with the damage, possible destruction of traditional bird, fish and animal habitat, and the mess that must be cleaned up. The costs of remuneration are hundreds of thousands of dollars with the public and the government of British Columbia stuck with most of the cost. Banks Island Mine Ltd. did not post adequate bonds to cover such potential damages. A sad personal story is that the employees of Banks Island Mine Ltd. did not receive their severance benefits. Also there are pages after pages of unsecured creditors that were not paid.

Nevada County must look at the Rise Gold application with extreme caution. I read from newspaper accounts and Rise Gold's press releases that the application is costing a huge amount of money. There are hundreds of hours of county and related agencies staff time, and for the volunteers on the planning commission, and much angst, concern and interest of the general public.

Ind 701-3

It's very interesting that even Rise Gold itself cautions investors and states on its website:
"No current mineral resources or mineral reserves have been defined... The Company has not completed a feasibility study to establish mineral reserves and therefore has not demonstrated economic viability for the Idaho Maryland Mine."

Ind 701-4

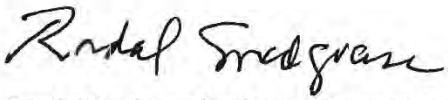
And also, very concerning is this from the Securities and Exchange Commissions reports about Gold Rise's publicity:
" such press releases that contain forward looking statements within the meaning of applicable securities laws... Words such as plan, expect, intend, believe, anticipate, and estimate that certain events or condition may or will occur, accordingly readers should not place undue reliance on forward-looking statements and information contained in this release."

Ind 701-5

Rise Gold stated the estimated cost of the project would be $100 million dollars for full development. They have requested an 80-year permit, which is extreme, into the next century! That's four generations into the future.

To insure the viability of the applicant, the County should require Rise Gold to post performance and environmental safety bonds to continue being a permit applicant. I suggest 7% or $7million. We need to look at this with eyes wide open. Without such safety, we could end up like other towns, and rural areas that were left holding the bag by gold mines for failed promises and non-redeemable environmental damages. Good Insurance covering loss and liability is a common practice and should be required to help safeguard our county's economic, environmental and civic vitality.

Rondal Snodgrass



Rondal Snodgrass has been a Conservation Land Consultant in California for over 30 years and holds a degree in Economics from the University of Oregon

INDIVIDUAL LETTER 701: RONDAL SNODGRASS

Response to Comment Ind 701-1
This is an introductory comment that expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2.

Response to Comment Ind 701-2
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

Response to Comment Ind 701-3
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Response to Comment Ind 701-4
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Response to Comment Ind 701-5
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Individual Letter 702



RONDAL SNODGRASS

CONSULTATIONS

RECEIVED
FEB 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

February 16, 2022

To the Nevada County Planning Commisssion

First District
Danny Milman

Second District
L:aura Duncan

Ind 702-1

Third District
Robert Ingram

Fourth District
Mike Mastrodonata

Fifth District
William Grenno

I respectively submit this letter of concern for your attention.

Thank you for your voluntary service for our County,

Rondal Snodgrass

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com

February 16, 2022

Open Letter to the Nevada County Board of Supervisors and Planning Commission

I have studied with much interest and concern about the application of Rise Gold to reopen the Idaho-Maryland mine. The potential environmental impacts are serious as are reported in the Draft Environmental Impact Report

In their application, Rise Gold is proposing extensive mining operations that could greatly alter the peaceful climate of Grass Valley, disrupt normal commerce, and re-create the very dangerous industry of underground mining.

When considering the viability of such a corporate development proposal it calls upon good business practices to ask for the credentials of the applicant, require proof of economic viability, a business history, and the resume of the representative leadership.

I have learned that Rise Gold is a speculative company. They have no business history. The present stockholders are gold investors throughout the U.S, Canada, off shore, and Wall Street. It is a company formed without capital needed for the project, but raised money through loans and stock sales to get the land, pay for EIR consultants and hire a public relations firm. Some commentators on gold driven companies say they mine stock value, and hope for gold. They are creating profits by manipulating value as they use government processes, and public relations. The permit if ever granted would multiply stock values. That permit could then be sold.

Ind 702-2

A glaring and shocking fact that I uncovered is that the Rise Gold's present CEO has previously been embroiled in a failed mine, financed in this same way, up in British Columbia. The corporation he managed, called Banks Island Gold Ltd, declared bankruptcy when the government ordered the mine closure. The mine's safety engineer became a whistle blower, sending photos of damage to government officials, bringing in helicopters and regulators. At that time there were 35 charges of failed compliance regarding environmental and safety standards. Court cases continue with fines and appeals of this CEO's role in the mine failure.

The mine is located on Banks Island, off shore from Prince Rupert, and is within territory of the Indian Gitxala Nation. They are outraged with the damage, possible destruction of traditional bird, fish and animal habitat, and the mess that must be cleaned up. The costs of remuneration are hundreds of thousands of dollars with the public and the government of British Columbia stuck with most of the cost. Banks Island Mine Ltd. did not post adequate bonds to cover such potential damages. A sad personal story is that the employees of Banks Island Mine Ltd. did not receive their severance benefits. Also there are pages after pages of unsecured creditors that were not paid.

Nevada County must look at the Rise Gold application with extreme caution. I read from newspaper accounts and Rise Gold's press releases that the application is costing a huge amount of money. There are hundreds of hours of county and related agencies staff time, and for the volunteers on the planning commission, and much angst, concern and interest of the general public.

Ind 702-3

It's very interesting that even Rise Gold itself cautions investors and states on its website:
"No current mineral resources or mineral reserves have been defined... The Company has not completed a feasibility study to establish mineral reserves and therefore has not demonstrated economic viability for the Idaho Maryland Mine."

Ind 702-4

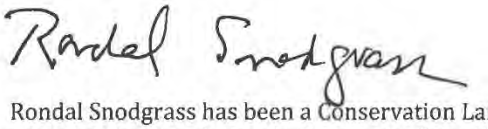
And also, very concerning is this from the Securities and Exchange Commissions reports about Gold Rise's publicity:
" such press releases that contain forward looking statements within the meaning of applicable securities laws... Words such as plan, expect, intend, believe, anticipate, and estimate that certain events or condition may or will occur, accordingly readers should not place undue reliance on forward-looking statements and information contained in this release."

Ind 702-5

Rise Gold stated the estimated cost of the project would be $100 million dollars for full development. They have requested an 80-year permit, which is extreme, into the next century! That's four generations into the future.

To insure the viability of the applicant, the County should require Rise Gold to post performance and environmental safety bonds to continue being a permit applicant. I suggest 7% or $7million. We need to look at this with eyes wide open. Without such safety, we could end up like other towns, and rural areas that were left holding the bag by gold mines for failed promises and non-redeemable environmental damages. Good Insurance covering loss and liability is a common practice and should be required to help safeguard our county's economic, environmental and civic vitality.

Rondal Snodgrass



Rondal Snodgrass has been a Conservation Land Consultant in California for over 30 years and holds a degree in Economics from the University of Oregon

INDIVIDUAL LETTER 702: RONDAL SNODGRASS

Response to Comment Ind 702-1
This is an introductory comment that expresses general concerns regarding the proposed project. Please see Master Responses 1 and 2.

Response to Comment Ind 702-2
The comment does not address the adequacy of the DEIR. Please see Master Responses 1 through 3.

Response to Comment Ind 702-3
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Response to Comment Ind 702-4
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Response to Comment Ind 702-5
The comment does not address the adequacy of the DEIR. Please see Master Response 1 through 3.

Individual Letter 703



RONDAL SNODGRASS

CONSULTATIONS



March 30,2022

Matt Kelley
959 Maidu Avenue
Suite 170
Nevada City, CA
95959-7902

Dear Mr. Kelley,

Ind 703-1 I will appreciate you sharing the following comments with the Nevada County Planning Commission concerning the DEIR for reopening of the Idaho Maryland Mine. Thank everyone in your department and the volunteer planning commission members for the public opinion meeting on March 24. All requests to speak were honored and accommodations for the overflow crowd were superb.

Ind 703-2 Concern Number: 1
CEQA requires the presentation of alternatives to the permit for reopening. This is not adequately covered within the DEIR. Requests for re-zoning will impact the surrounding area and County plan. There are public funds available for purchasing this property for alternative uses. The alternative cost used in economic analysis can present impacts positive and negative for granting a permit or not granting a permit and the consequences of such decisions.

Ind 703-3 Concern Number 2:
There are numerous environmental impacts listed in the DEIR and as required mitigations to eliminate or reduce to acceptable levels those impacts. How can the county monitor such mitigations and deal with the costs and repairs that would result from mitigation failures? How can mitigations investigate the future consolidated costs? A permit request for 80 years is inter-generational, lifetimes away, and must account for the uncertainties of climate, economic and societal changes ahead. Insurance and performance bonds must be posted out front.

Ind 703-4 Concern Number 3:
CEQA calls for a cumulative impacts analysis for the County and the State of California. This is missing from the DEIR.

Thank you,

Rondal Snodgrass

Rondal Snodgrass

14582 Alderwood Way Nevada City, CA 95959 707-496-8729 ravenswatch@asis.com

INDIVIDUAL LETTER 703: RONDAL SNODGRASS

Response to Comment Ind 703-1
The comment is an introductory statement and does not address the adequacy of the DEIR.

Response to Comment Ind 703-2
The DEIR evaluates alternatives to the proposed project in Chapter. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.)

Response to Comment Ind 703-3
Please see Master Responses 1 through 3.

Response to Comment Ind 703-4
An analysis of cumulative impacts associated with the proposed project is provided at the end of each technical chapter in the DEIR. In addition, please see the discussions under the Cumulative Setting heading in Chapter 5, Statutorily Required Sections, of the DEIR, which starts on page 5-3. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Idaho-Maryland Mine Project

SCH# 2020070378

Final Environmental Impact Report

Volume VI of IX
(Chapter 2 *Continued* – Chapter 4)

Prepared for
County of Nevada

December 2022

Prepared by

RANEY PLANNING & MANAGEMENT, INC. 20 years
1501 Sports Drive, Suite A, Sacramento, CA 95834

2. Responses to Comments *(CONTINUED)*

Individual Letter 704

February 20, 2022

Dear Nevada County Board of Supervisors,

Ind 704-1 I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned aboul the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 704-2 MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 704-3 INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 704-4 TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Ind 704-5 Sincerely,

Rose Capaccioli,
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

INDIVIDUAL LETTER 704: ROSE CAPACCIOLI

Response to Comment Ind 704-1
The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 704-2
Please see Master Response 8 – Mine Waste Characterization and Master Response 11 – Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 704-3
For general concerns regarding greenhouse gas emissions, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Please also see Master Response 18 – Air Quality Thresholds, Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations, Master Response 27 – Greenhouse Gas Thresholds, and Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 704-4
The DEIR states that no project truck traffic would occur on State Route 174, nor the intersection of SR 174/Brunswick Road (DEIR, Table 4.12-9.) This is because the designated haul routes for the project are north of the Sites (see Figure 3-13 of the DEIR), as described thusly on page 4.12-85 of the DEIR:

- To Centennial Industrial Site Haul Route
  - Brunswick Road northbound between E. Bennett Road and Whispering Pines Lane;
  - E. Bennett Road between Project Driveway and Brunswick Road (eastbound)
- To SR 49 Haul Route
  - Brunswick Road northbound between E. Bennett Road and Whispering Pines Lane;
  - Brunswick Road northbound between Whispering Pines Lane and SR 49;
  - E. Bennett Road between Project Driveway and Brunswick Road (eastbound)

The project's contribution of traffic to the SR 174/Brunswick Road intersection is solely related to employee commute trips.

Response to Comment Ind 704-5
Please see the above responses to the commenter's concerns. The concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 705

February 20, 2022

Dear Nevada County Board of Supervisors:

I OPPOSE the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner in Cedar Ridge, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine in my backyard and underneath my feet.

I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 years: 182,500 tons per year! More tailings that polluting big rig trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come.

Ind 705-1

INCREASE GREENHOUSE GAS EMISSIONS
Haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

TRAFFIC AND SAFETY
The increase of vehicles, specifically 20 ton haul trucks, up to 100 round trips per day on Brunswick Road and the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will be significant and unavoidable even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20 ton trucks and children in cars/buses?
I think not. Vote NO to Rise MIning Company.

Sincerely,

Rosemarie Capaccioli

Rosemarie Capaccioli,
mailing address: P.O. Box 1812, Cedar Ridge, CA 95924
physical address: 11073 Cedar Ridge Dr., Grass Valley, CA 95945

RECEIVED
FEB 25 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 705: ROSEMARIE CAPACCIOLI

Response to Comment Ind 705-1

Please refer to Responses to Comments Ind 704-1 through Ind 704-5.

Individual Letter 706

From: Ross Guenther <rossguenther@comcast.net>
Sent: Thursday, March 24, 2022 2:55 PM
To: Idaho MMEIR
Cc: Matt Kelley
Subject: Comments on the Idaho-Maryland Draft EIR

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Please include the following comments for the Idaho-Maryland Mine Draft EIR:

REOPENING THE IDAHO-MARYLAND MINE WITH ZERO WASTE

The gold at the Idaho-Maryland Mine may be just the icing on the cake. The primary value for the people of Nevada County is likely the much needed clean and sustainable aggregate and ceramic building products that might otherwise remain as waste dump rock and mill tailings.

Ind 706-1

Having worked and studied the Idaho-Maryland Mine over the past half century, I had documented most of the same geologic conclusions as Rise Gold in their present Draft Environmental Impact Report (DEIR). In the mid 1990s I received a final EIR, and related permits to dewater the New Brunswick shaft. Later, new management changed the location for the main shaft from the Brunswick to the Centennial site. Subsequently, my team and I ran successful Ceramext™ pilot test tile plants at the Idaho-Maryland Mine. We also ran successful tests for over 50 types of tailings including basalt fines with the Pacific Northwest National Laboratory, and tailings for several copper and gold mines.

The Idaho-Maryland Mine tailings advantageously have only very amounts of arsenic. The contaminates, if any, are rendered inert to leaching or other means by locking them within a stable glassy matrix within the Ceramext composition. My team has patented several composition and method patents for manufacturing ceramics.

Recently I was asked to write a case study by the Editor of "Tailings Management Handbook, A Life-Cycle Approach". The Handbook was published in February, 2022 by The Society for Mining, Metallurgy & Exploration. The case study was titled "Repurposing Tailings and Other Earth Material Waste into Ceramics". The study included a review of the success in manufacturing high quality tile at the Idaho-Maryland Mine. The Handbook dives into a wealth of information contributed by more than 100 world-renowned experts and was edited by Kimberly Fink Morrison, Senior Director, Global Tailings Management, of Newmont. It should be essential that consultants for the Nevada County Planning Commission consider the Handbook's findings.

Ind 706-2

Part of the SME Handbook discusses co-disposal of tailings, a relatively recent method of combining larger barren dump rock with much finer mine tailings. This method is proposed in the Rise Gold DEIR to contain mine wastes at the Centennial and Brunswick sites of the Idaho-Maryland Mine and has several potential disadvantages. These disadvantages include the difficult compaction required, complexity of mixing particle sizes, and being more difficult and expensive than other methods. Also mentioned is that the method could be a ground stability hazard in wet seasons in populated areas.

Ind 706-3

Extensive compaction tests were made by Ceramext of Idaho-Maryland historic tailings and of freshly crushed core samples of many mineral grain sizes (including some with larger fragments) with optimal wetness and extremely high pressures. This was for ceramic production prior to firing. In all cases the compacted material had very low strength and could not withstand even

1

small amounts of added water without becoming liquified. This could likely result in the tailings dangerously flowing down Wolf Creek into the city of Grass valley, gradually or all at once, for both the Brunswick and Centennial proposed tailings storage areas.

A better alternative would be to manufacture profitable high-quality low-cost floor and roofing tile, wall siding, counter-tops and many other green fireproof ceramic building products from the tailings. The larger waste development dump rock could be profitably sold as aggregate. If this profitable alternative of manufacturing ceramics is taken, the entire project could be done on the Brunswick industrial site without hauling tailings and development rock to the Centennial site.

Ind 706-4

In our area, as well as throughout the world, we are having problems with climate change, fires, and drought. Complicating this problem further are supply chain issues causing more delays, expenses and pollution from importing ceramics and other materials from China and other distant places. NID could economically conserve more water by using canal liners and piping made from tailings ceramics. PG&E presently needs thousands of miles of underground conduits (possibly partially made with tailings ceramics) to prevent wildfires and lower our energy costs.

In Nevada County we can have a clean and sustainable gold mine without waste dumps and excessive traffic, and produce high quality ceramics. So yes, you can have your cake and eat it too.

Ross Guenther is the General Manager of Ceramext, LLC and lives in Penn Valley, CA.

2

INDIVIDUAL LETTER 706: ROSS GUENTHER

Response to Comment Ind 706-1

The commenter proposes an alternative to the use of sand tailings as engineered fill by manufacturing tailings into ceramic products. This process was analyzed for a project proposed by a previous applicant in a Draft Environmental Impact report prepared by Environmental Science Associates for the City of Grass Valley in 2008 (ESA 2008)[1]. The 2008 DEIR contemplated a 600 ton per day ceramics plant (Phase I) with expansion of ceramic production to 1,200 tons per day (Phase II) (see Section 2.7 of ESA 2008). The Phase I production rate is similar to the amount of sand tailings proposed to be used for engineered fill by the current proposed Idaho-Maryland Mine Project. The project was found to have a significant and unavoidable air quality impact due to NO_x emissions, primarily due to the manufacturing of ceramic products. Operational NO_x emissions for Phase I were estimated at 643 pounds per day (see Table 4.2-6 of ESA 2008). The project was found to have a significant and unavoidable impact on global climate change due to CO_2 emissions, primarily due to the manufacturing of ceramic products (see Section 4.2.4 of ESA 2008). Construction and Operational CO_2 emissions for Phase I were estimated at more than 70,000 metric tons per year of CO_2e (see Table 4.2-8 of ESA 2008). The commenter's proposed alternative would substantially increase the severity of impacts for the current proposed Idaho-Maryland Mine Project and create at least two new significant and unavoidable impacts. The commenter does not provide any information of how this alternative would lessen any impacts from the current proposed project. Further, the market for ceramic products made from material generated by the mine is speculative, and there is no evidence that such a market exists. An EIR need not evaluate an alternative that is considered speculative, theoretical, or unreasonable. Not every potentially feasible alternative need be considered; rather, the relevant test is whether a "*reasonable range*" of feasible alternatives is considered for that particular project (Guidelines §15126.6(a)). Given that the proposed alternative would create new significant impacts, has not been shown to reduce any significant impacts, and is speculative, the commenter's proposed alterative is not considered further.

Response to Comment Ind 706-2

The commenter asserts that the project's proposed method of using waste rock and tailings for engineered fill has disadvantages due to compaction and mixing difficulties. NV5 provides recommendations for blending of rock and tailings on page 14 of appendix H.1 to the DEIR. As stated on this page, crushed blast rock with a maximum dimension of 6 inches may be blended into sand tailings to produce engineered fill material of up to 2 parts blast rock to 1 part sand tailings. A greater ratio may be feasible but would likely not be testable using nuclear methods and require a procedural test method. The engineered fill methods proposed in the DEIR are feasible based on the analysis done by NV5 in appendix H.1 to the DEIR.

The commenter states that the method of blending larger barren rock with much finer tailings would be a ground stability hazard in wet seasons in populated areas. The stability of engineered fill slopes, and response to precipitation and storms, is discussed on page 4.6-34 of the DEIR. The face of the fill should be easily maintainable at a slope of 1 to 3 (rise over run). The fill is going to be constructed over a period of years, and while most of the surface can be maintained in a finished, or semi-finished and stable vegetated condition, during the life of the project, there will likely be areas that will be open and subject to potential erosion should a larger than expected storm occur. An important design feature shown on the grading plans are the detention ponds

[1] ESA (Environmental Science Associates). (2008). *Draft Idaho-Maryland Mine Project Environmental Impact Report* San Francisco, California.

that are to be constructed immediately down-gradient of the fill areas. These ponds, while collecting sediments, also provide a second level of containment in the event that unanticipated erosion of an open surface occurs. Further, the design of the pond will allow any eroded material that has entered it to be recovered and reused beneficially. According to ECM's peer review of the DEIR and appendices, the design has been well thought out and is appropriate for the Site and project.

The commenter does not identify any inadequacies in the DEIR's analysis.

Response to Comment Ind 706-3

The economic benefit of converting sand tailings to ceramics is a not a CEQA issue required to be analyzed in the DEIR. Please see Master Response 1 – Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

The commenter states that even a small amount of water added to compacted engineered fill could lead to liquefaction and result in tailings dangerously flowing down Wolf Creek into the city of Grass Valley. However, as stated on page 4.6-11 of the DEIR, liquefaction occurs when saturated fine-grained sands and/or silts lose physical strength temporarily during earthquake induced shaking and behave as a liquid due to the loss of point-to-point grain contact and transfer of normal stress to the pore water. Liquefaction potential varies with water level, soil type, material gradation, relative density, and probable intensity and duration of ground shaking. As stated on page 4.6-41 of the DEIR, the Geotechnical Engineering Reports concluded that the overall potential for liquefaction at both the Centennial and Brunswick Industrial Sites is remote. ECM was retained by Raney (the County's EIR consultant) to perform an independent third-party peer review of the geotechnical documents prepared by NV5. ECM's peer review did not identify any deficiencies in NV5's reports. (see Page 4.6-29 of the DEIR)

Please also see Response to Comment Ind 706-1 regarding the commenter's proposed alternative.

Response to Comment Ind 706-4

Please see Response to Comment Ind 706-1 regarding the commenter's proposed alternative.

Individual Letter 707

February 16, 2022

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
950 Maidu Avenue, Suite 170
Nevada City, California 95959-7902

IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION

This letter demonstrates the technical background and expertise to clearly state that the **IDAHO-MARYLAND MINE PROJECT:**

Ind 707-1
- Has the potential to start an economic, health and environmental chain-reaction that can desolate this thriving community.

Ind 707-2
- Has the potential to degrade/destroy private wells, leaving homes and farms inhabitable by the end of the day.
- Cannot predict the number of well failures that will result in generations of families losing home, small business and farm values without the having the resources to move or rectify the situation.

Ind 707-3
- Is equal to the daily water use of 16,000 citizens.

Ind 707-4
- Has a 30-acre-foot clay-lined settling pond for heavy metals that borders an earthquake fault line.

Ind 707-5
- Has, in addition to toxic and hazardous processes, severe soil issues with erosion, permeability and expansion.

Ind 707-6
- Is equal to an additional 3,450 cars on the road, every day.

Ind 707-7
- Will have a constant stream of massive dusty trucks that will destroy the structural integrity of the pavement.

Ind 707-8
- Does not provide funds for the perpetual maintenance of street lighting, traffic signals or pavement.

Ind 707-9
- Will not provide street or other improvements to the community, but only pays a "fair share" with no other funding provided.

Ind 707-10
- Will, every day, use a ton of explosives to set-off 257 detonations.

Ind 707-11
- Will require a Mass Evacuation Plan for the community.

Ind 707-12
- Will probably follow the historic record and be abandoned in five years.

Ind 707-13
- Will only benefit and profit Rise Grass Valley, a private company, while robbing the community of Grass Valley of public resources, integrity and reliability.

Page 1

Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

For over 40 years, I was employed as an engineering consultant. During my almost 20-year employment with a civil engineering firm, I found my niche. My area of expertise is not design. My expertise is in the areas of project analysis and evaluation, financing and implementation, and the maintenance of facilities in perpetuity. Incorporating in 1996, I headed a consulting firm for an additional 20 years. Following that time, for a 2-year transition period, I was employed as a principal consultant with an engineering firm, retiring in 2019.

During my career, all clients were various public agencies, counties, cities, municipal water districts, hospital districts, and fire protection districts. Representative is my work with a Southern California City with a rich history in the citrus and stockyard industries. The City evolved over the decades with a series of annexations that expanded the City by over 6,500 acres. These annexations allowed for residential, commercial and industrial development by providing major infrastructure for water, sewer, drainage, transportation corridors, and utilities. The intent was to aesthetically provide, in a sustainable manner, for anticipated growth crossing multiple drainage and water courses and transportation corridors. Public features such as fire stations, schools, parks, passive and active open space, golf courses, and fire buffer and fire protection zones were planned for and included.

Ind 707-14

Germane experience is further illustrated in the planned realignment and demilitarization of an US air force base. These actions included a 1,200-acre commercial/industrial development and a 236-acre healthcare campus requiring extensive demolition, the removal of hazardous materials, and the construction of major drainage and transportation facilities. These projects involved a variety of funding mechanisms for new construction, facility upgrades and conversion, as well as, for the perpetual maintenance of major flood control facilities, drainage areas, landscaping, street lighting, traffic signals, and streets.

My daughter, a teacher, and her husband, a therapist, own a home and work in Grass Valley. They have a young son and we look forward to more grandchildren in the future. When we can no longer manage the slice of paradise where we have lived for almost fifty years, my husband and I will join the family on their acreage in Grass Valley. Which is why I am involved, it's personal.

Listed at the end of this letter are my comments that correspond to Table 2-1, Summary of Impacts and Mitigation Measures, Chapter 2, of the EIR. Additional information referenced, in conjunction with this review of the EIR, includes the County's General Plan, population and employment data provided by the State of California's Employment Development Department, water use trends provided by the Legislative Analyst Office of the California Legislature's Nonpartisan Fiscal and Policy Advisor, Executive Reports issued by Division 5 of the State Water Resources Control Board and articles printed by the Union, the San Francisco Chronicle, CBS Sacramento, and the Atlantic.



Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

In addition to the comments on Table 2-1, certain aspects of this controversy are discussed as follows:

1. In general, California State statute provides for and requires legislative bodies, in this case the County of Nevada, to establish a process for reviewing a property owner's proposed project. We are at the beginning of this process. Due to the significantly adverse social, economic and environmental ramifications of this project, it will be a lengthy certification process.

Ind 707-15

However lengthy, which I emphasize is due to the adverse nature of this project, and not the process itself, I am clear on proposing specific motions be taken by the County Planning Commission and the Board of Supervisors. Four Project Alternatives are presented for consideration in said Chapter 2. Following close of the Public Hearing on the Final EIR, the proposed motion to be taken by the Planning Commission would be to approve and recommend to the Board of Supervisor's adoption of Alterative 1, the No Project (No Build) Alternative. Following the Public Hearing to be held by the Board of Supervisors, I further advocate and recommend a motion by the Board giving final approval to Alternative 1, No Project.

2. During the course of 40 years, I have worked with many public agencies, property owners, corporations and other interested parties. Any difficulty can be surmounted if all members of the Project Team are honest about the risks involved and recognize the concerns of, and are responsive to, the community. I am disheartened by the cavalier attitude demonstrated by the property owner, Rise Grass Valley (RGV).

Ind 707-16

By soliciting certain groups and providing pre-printed support cards, RGV is actively working to rile-up and divide the citizenry. Grass Valley has a rich history and is multi-generational. The community protest against this project is spontaneous and crosses every economic, political, age, sex, race and divide you can find. Mr. Mossman, President of RGV, and RGV have shown a blatant disregard for the integrity of this community and is using the American flag to bully his way about town.

My kids know all their neighbors and felt joyous welcome when they moved here, pies included. With their neighbors, they have made it through scorching days, wildfires, heavy rains, heavy snows and weeks without water and electricity. Together. That is why we are investing in the community of Grass Valley, not to get rich and flash gold around.



Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

3. In mentioning the American flag, I am wondering why the changes in the firm's structure and citizenship. In 2005, when RGV began purchasing aspects of this project, it was a company headquartered in Vancouver, British Columbia, Canada. RGV is now a local subsidiary and Mr. Mossman has changed his Canadian citizenship to American. He has indicated that he now lives and works in Grass Valley. There must be a reason to go to all this work and legal expense. Perhaps the reasons for these changes are for public relations, or taxes?

Ind 707-17

4. The EIR lists a projected workforce of 111 employees per shift, with a total of 312 employees. With two 12-hour shifts, a more reasonable estimate would be a total of 220 to 250 employees. The investment will be in machinery, not employees or improvements to the community. These are not secure jobs with unique potential or opportunity. A shut down or prolonged periods of inactivity are not unusual. The EIR clearly states, multiple times, there were many instances of inactivity during the 1866-1956 production periods. Due to the insurmountable difficulties and the negative impacts, shutdowns typically occur in the fifth year.

   In many statements, Mr. Mossman has misrepresented the economic and employment prospects of the project. Misrepresentation includes the number of employees, the number of local hires, and the outlandish claim that over 300 additional community jobs will be created. This is irresponsible misrepresentation. Further misrepresentation has been made in statements regarding expansion of the tax base and new public spending in the amount of $50 million.

Ind 707-18

5. Mr. Mossman has often stressed the amount of money RGV has spent on this project. Any cost incurred by RGV has been their decision made for the benefit of RGV and not the community of Grass Valley. The County of Nevada has incurred no obligation to RGV. Future improvements will be to the benefit of RGV or as a result of the significant hazardous impacts of this project. RGV has never had this type of responsibility before, this being the first mine in the company's portfolio. The firm's earnings reports indicate this venture is short of funding.

   Who goes into this type of project underfunded? IF RGV can't stand the heat, they should abandon a project they do not appear to comprehend. A firm going into the mining business should have the understanding of a capital intensive undertaking with many surprises and no guarantees. Mining is a business of starts and stops with unforeseeable delays and uncertain employment. The multiple risks this project brings to Grass Valley are unacceptable.



Matt Kelley, Senior Planner
NEVADA COUNTY PLANNING DEPARTMENT
IDAHO-MARYLAND MINE PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) EVALUATION
February 16, 2022

Ind 707-19

6. Long before RGV purchased the Centennial and Brunswick sites, it was recognized that historic mining activity had deposited or exposed natural occurrences of lead, arsenic, mercury and other metals at concentrations exceeding background soils metal concentrations and regulatory benchmark concentrations. In 2005, the Federal Environmental Protection Agency identified the Centennial Industrial Sire as a potential Super Fund Cleanup Site, and in 2018, confirmed that environmental remediation was necessary. Since purchasing the property in 2005, with full disclosure and an understanding of these hazards, RGV has been working with the California Department of Toxic Control (DTSC).

   Seventeen years later, no goals have been established, no cleanup activity has occurred, and no cleanup activity is scheduled to occur. Other than entering into a voluntary agreement twelve years ago with the DTSC, RGV has shown no intent or forward motion to commence action. RGV has not demonstrated, by any means, good faith efforts towards the environment of Grass Valley, preferring to play a shell game and stall for time.

Ind 707-20

7. Mr. Mossman has been quoted making comments such as, "Working in a mine now is like working in a residential community" and "There's no trade-off between the environment and jobs, we've designed it to have no impact on the environment".

   He also has the audacity to state that there isn't a problem with heavy metals where they are going to dig. How can Mr. Mossman make these statements when soils reports have indicated otherwise? It is well documented that there are health risks to the plants, animals, water, and humans at both the Centennial and Brunswick sites.

   There are already problems at the Brunswick site with more to come when the site is stripped of vegetation and the impact of prior mining activities is laid bare. As RGV digs around, at a depth of 5,000 feet within an underground area of 2,585 acres, we have no comprehension of the sink holes, landslides, flooding, and other issues that will be uncovered as we discover the impact of time and weather on the numerous uncharted abandoned mines that are known to exist.

   If an issue isn't recognized, it can't be solved or mitigated. Mr. Mossman prefers to deny and fails to recognize the significantly adverse social, economic and environmental ramifications of this project. Again, this firm has no experience in mining. RGV is not the firm to undertake mining activity, anywhere, let alone undertaking the dewatering that will need to occur 24/7 under this project.

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8. With growth, there are consequences, and oftentimes a reckoning. In an attempt to prevent recessions, bankruptcies, delinquencies, inflation, and project abandonment, new projects are justifiably under independent scrutiny. Stressing the word independent, studies on market trends, absorption rates, economic analysis, and appraisals can be invaluable to public agencies. Some projects just don't pan out, especially over the long term.

   Just because there is gold, doesn't mean we need to or should go get it. Gold has historically been a highly volatile commodity, subject to world market conditions and government policy. There is a reason they call it gold fever, it is a sickness. It is tempting to romanticize the past mining activities. With rampant disease, filth and malnutrition, the water was so degraded it was necessary to put your laundry on a boat to China.

9. Grass Valley is recognized by the County as a Community Region. While the population has remained constant, income levels in the area have steadily increased. Unemployment rates tend to be lower than the state and national averages, with the current unemployment rate being around 3.7%.

Ind 707-21

As the kids get back in the school room, Grass Valley has every reason to have a positive outlook for the future. There are labor shortages for skilled labor to shore up the energy grid, internet, and other infrastructure. Young professionals have found possibilities and moved here with their families. The baby boomer generation is retiring and many are taking early retirement, opening more employment opportunity in the community. For example, when I retired, three Project Managers assumed my workload.

This project romanticizes the past and is a distraction the community doesn't need. Enough of the community and county's resources have been given to this project. I have yet to find a policy statement, an initiative, a justification, a referendum, or community desire for this project at these locations.

In the Sierras, there is a neighborhood that has been plagued by wildfires and power outages. That neighborhood is using thermal energy to power homes during times of power outages. Air quality is still lousy but they can stay in their homes, keep the wells pumping and the food cool. Grass Valley is also inventive and has many resources, especially their neighbors. Upon the Board of Supervisor's approval of Alternative 1, No. Project, the County can direct resources towards other projects that provide truly sustainable services and benefits to the community.

Thank you for the consideration of my comments. Please contact me for any further discussion.

/S/ Roxanne E. Shepherd, 2370 Edgehill Road, Vista, CA 92084-4824, (760) 390-0679,
roxshepherd4@gmail.com

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Roxanne Shepherd's Comments on
Table 2-1, Summary of Impacts and Mitigation Measures, Chapter 2, of the EIR

The public is aware of the significant adverse social, economic and environmental ramifications of this project. Public comments have been documented in the EIR. The intent is to highlight statements within the EIR and offer additional viewpoints.

Ind 707-22

Aesthetics (Section 4.1 etal) – No Comments

Agriculture and Forestry Resources (Section 4.2 etal) – No Comments

Air Quality and Greenhouse Gas Emissions (Section 4.3 etal) - With the occurrence of daily dramatic climate events and over forty pages on air quality and greenhouse gas impacts, the EIR finds these impacts to be LS, Less than Significant and LCC, Less Than Cumulatively Considerable. Truck hauling and rock grinding activities will take place 24 hours a day, 7 days a week. If RGV doesn't meet goals or incurs production delays, it can be assumed they will apply for a Limited Threat Discharge Permit (further discussed under Section 4.8) .

The EIR projects 118 maximum daily round trips (2 trips) for haul trucks and suppliers. In terms of actual impact (structural stress and mechanics), these huge vehicles easily equate to 15 cars per truck. Accordingly, these trucks equate to 3,540 daily car trips. Each dusty truck trip removes water and oxygen from the air and replaces it with particulates and toxins having a significant and unavoidable impact.

Ind 707-23

Once this project starts, it can't halt production. If there is a power outage, at a minimum, two 7,500-gallon trucks will need to deliver diesel to the facility on a daily basis. The daily baseline energy consumption of this facility is equal to 15,000 gallons of diesel fuel. This use does not include energy for the transportation of trucks and other vehicles in and out of the facility.

If the Board of Supervisors votes to approve any aspect of this project (Alternatives 2, 3 or 4), the Board will also need to adopt a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against the unavoidable adverse impacts.

Biological Resources (Section 4.4 etal) – The EIR states that the impacts to the biological resources due to this project are LS, Less than Significant and LCC, Less Than Cumulatively Considerable. In order to reach this conclusion there are Transplant Monitoring Programs, Pre-construction Survey and Avoidance and Minimization Measures, Watercourse/Wetlands/Riparian Management Plans, and Habitat Management Plans with Habitat Enhancement and Conservation Easements for each species (four programs).

Ind 707-24



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These programs can entail growing endangered species from seed. Four programs will be prepared for the Pine Hill Flannelbush, the Foothill Yellow-Legged Frog, the Western Pond Turtle, the California Red-Legged Frog, the California Black Rail, the Coast Horned Lizard, Special-Status Bats, Non-Special Status Raptors and Migratory Birds, and any other plant and animal that will be disturbed by this project.

There appears to be no funding for these labor intensive plans. Unless these plans are fully funded and supported by community groups, they will fail. Lacking community involvement and sufficient fundin,g it can be anticipated that complaints will be made and they will be ignored to the point of distraction. Those that care will be ridiculed and nothing will get done. If these programs fail, the community's biological resources die. It has taken over 100 years to superficially recover from prior gold mining activity. There are still hazardous materials and discarded facilities in the County that can be considered ticking time bombs. There are no plans or actions proposed to rectify these issues.

Ind 707-25

Cultural and Tribal Cultural Resources (Section 4.5 etal) – No Comments

Geology, Soils and Mineral Resources (Section 4.6 etal) – The EIR has identified various loam soils types where construction is proposed to take place within the East Bennet Road ROW and the mining sites. These loam soils types, along with the sand and silt caused by prior mining activities, have been identified as having a severe high erosion potential. Samples indicate erosion is very likely to occur, with the hazard being a high, or a moderate to high, erosion potential. No areas have been identified as having a low potential for erosion.

A moderately slow rate of permeability (drainage) has been identified for these soils. Those areas containing clayey alluvial land have a moderately slow to a very slow rate of permeability. Expansive soils are characterized by their ability to undergo significant volume change due to a variation in moisture content. Expansive soils tests have established a moderate to high potential for expansive soils hazards that will affect the proposed improvements at all sites, especially the Brunswick site.

Ind 707-26

Physical closure is recommended for near surface features from prior mining activities that could become unstable, including three shafts, a drain and a tunnel. The site contains steep slopes gradients, 30% or greater, natural and manufactured, that allow for the leaching of toxic and hazardous materials.

This area lies within a Type C Fault Zone, with low seismicity, a low rate of occurrence and a moment magnitude of 6.5. The EIR assumes that since no historic seismic activity has been documented, there is no evidence the area is seismically active. However, the eastern shore of the 30-acre-foot clay-lined settling pond is adjacent and parallel to an unnamed north, northwest trending fault line. It is also noted that the fault line enters Wolf Creek which lies along and parallel to the south shore of the pond. This pond is to be used for water storage and surge capacity; and, for the settling and removal of total suspended solids, a significant portion being dissolved lead and manganese. The pond is scheduled to be cleaned-out every ten years.

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All design and construction will be under the guidance of the County's Mitigation Measures and Best Management Practices of the Management Plans for Steep Slope and High Erosion Potential. From an engineering perspective, in theory, the proposed design and paste backfill construction could work. However, the EIR states that an entire project-area baseline has not been established and existing conditions may vary and be worse than the given estimates. The EIR also acknowledges that the proposed activities and disturbances set forth under the Measures and Practices may actuals result in further damage to the community and environment. However, with subsurface drainage control, trenching, compacting, reinforcing, evacuating, stabilizing, and placement activities, the EIR states the S, Significance impacts will be reduced to LS, Less than Significant.

Problems arise during implementation and construction when the unexpected occurs. The energy and the resources required to be expended to support this project will be without limits. At what point, at what cost, is this project abandoned? Historically, the sites are abandoned after a five-year period.

Hazards and Hazardous Materials (Section 4.7 etal) - It has been well documented that historic mining activity in Grass Valley and the surrounding areas has deposited or exposed natural occurrences of lead, arsenic, mercury and other metals at concentrations exceeding background soils metal concentrations and regulatory benchmark concentrations. Until cleaned-up, the 56.4-acre Centennial Site is closed and remains an active treat in the middle of the Grass Valley Community. In addition to the existence of these hazardous materials, the EIR indicates the 119-acre Brunswick site has been used as a dump site.

Ind 707-27

The EIR acknowledges that a full survey of the 119-acre site has not been done. With the historic storage and use of petroleum, PCPs, pesticide and hazardous products, undocumented soil fill, refrigerators, undocumented drums, undocumented drainage structures, former transformers, and above-ground storage tanks, mine shafts, standing water, and suspect pits that litter the site, an adequate survey would be delicate, labor intensive and prohibitively expensive. The EIR further states that the location, status and total number of monitoring wells within the site is not definitely known.

Due to the toxic nature of the proposed activities, and the explosives that will be stored on-site, an Emergency Response and Evacuation Plan will need to be structured to provide evacuation strategies for the County's response to emergencies that involve the mass evacuation of people and animals from an impacted area.

Under the EIR, the mine operator and the RGV employees will be monitoring and certifying that the S, Significance Impacts of this hazardous project will be reduced to LS, Less than Significant.



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Ind 707-28

Hydrology and Water Quality (Section 4.8 etal) – Reference is made to Figure 4.8-4, Map of Domestic Supply Wells and Underground Mine Workings, of the EIR. An "as of" date is not given for the Map and new wells are daily being installed. There is a realistic six-month backlog of new well requests in the area. The reliance on wells illustrated on this Map is sufficient basis for the approval of Alternative 1, No Project.

If this project moves forward, it should be anticipated that RGV will apply for a Limited Threat Discharge Permit. This will allow **unlimited** amounts of discharge subject to **quarterly** monitoring at a specified site by the State Water Resources Control Board (SWRCB).

Grass Valley annually experiences 65 rainy days with an average rainfall of 55 inches. Leaching takes place when it rains. To be effective, reporting should be required after every rain and wind event. To know there are "adequate above- and below-drainage structures" is not the point. The point is that water will go through the treatment plant, through the 30-acre foot waste settling pond, and into Wolf Creek.

Any proposed action in the EIR that simply monitors the impact is not true mitigation. As with all public agencies, Division 5, SWRCB has casework overload further aggravated by COVID. For the period of July 1 to December 31, 2021, 57 facilities (42%) of the 151 target facilities were inspected. The number of non-target facilities was not listed in the SWRCB Executive Report. Years can go by without a State or Federal inspection while discharges of over 250,000 gallons per day, are allowed. Although presented otherwise, the proposed actions set forth in the EIR do not adequately reduce the significant and unavoidable impacts of this project.

The hydraulics and hydrology of this project are very complicated. As water levels fluctuate on a project of this size, the actual stress on the existing infrastructures will not be known until breakage occurs. The ramifications of massive well failures would be devastating. Rural irrigation districts are not typically designed to meet high demand and can be plagued by maintenance issues that affect water reliability, insurance rates, and the financial ability to move beyond merely placing band-aids on the system. Should this occur, funding and liability is not addressed in the EIR.

Private wells are the backbone of this community. If well failure occurs, a home becomes inhabitable within hours. This project has the potential to start an economic, health and environmental chain-reaction that can desolate this thriving community. The EIR states that this project is located in two watershed areas and will substantially degrade surface and ground water quality; impede sustainable ground water management of the water basins; extensively alter existing drainage patterns resulting in erosion, flooding; impede and redirect flood flows; and, pollute. It is astonishing these facts are not considered in the EIR to be significant and unavoidable. When digging thousands of feet below the ground water level, the pumps removing the water cannot stop. Water will be constantly sucked out of the ground (dewatering) and poisoned before discharge in Wolf Creek.

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However, the EIR finds that, because there are management and monitoring plans, all of these impacts are reduced to LS, Less Than Significant.

It is noted that water usage is discussed under Section 4.11, Public Service and Utilities.

Ind 707-29

Land Use and Population and Housing (Section 4.9 etal) – An EIR can set a project's trajectory. This EIR inadequately protects the environment and its citizenry. In order to avoid setting any precedent for this project's forward motion, is recommend that the Board of Supervisors deny approval of the EIR. Over time, these impacts are compounded and expand into new long-term negative impacts. Due to a lack of adequate REM sleep, what is a noise problem can becomes a concentration and behavior issue at home, school or work..

Ind 707-30

Noise and Vibration (Section 4.10 etal) – Every day, for 80 years, this project can use a ton of explosives to set off 257 detonations. Approximately 500 tons of barren rock and 1,000 tons of mineral rock will be ground every day, for 80 years. As previously stated, every day, this project will equate to an additional 3,540 cars on the road.

The EIR acknowledges that the current noise level in the Grass Valley Community is already S, Significant. The EIR finds that the noise impact of this project will be SU, Significant and Unavoidable.

Ind 707-31

Public Services and Utilities (Section 4.11 etal) - Fire protection and emergency services, police for the security of hazardous and explosive materials, water supply, wastewater, solid waste, electricity and gas, are all community resources that will be used to support a project that benefits a private company. These facilities have been paid for and maintained by the citizens of the community. However, The EIR considers the impact of this project on public service and utilities to be N/A, Not Applicable.

The EIR states that water usage per day for this project will be 5,700 gallons per day (gpd) of potable water for sinks, toilets and showers; 42,000 gpd of non-potable water for dust suppression and compaction; 84,000 gpd of groundwater during operations; and, once dewatering is complete, 1.2 million gpd will be pumped to the surface for treatment, totaling 1.4 million gpd of water use. The typical person in this area consumes for inside and outside water purposes, an annual average of 85 gpd. In water alone, this project will consume an amount that would serve almost 16,000 people every day.

Ind 707-32

Transportation (Section 4.12 etal) – Under all scenarios, the proposed project would increase traffic through intersections already identified by CALTRANS as already operating under unacceptable conditions. As proposed, conditions only worsen along the 24 identified streets and intersections. The project will fund what is termed a "fair share contribution" to bring transportation operations to an acceptable level. The determination of fair share contribution is not based on benefit, but rather the percentage of access upon a route. For example, a project may be required to fund 8% of a specific traffic signal.

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The EIR states that because the remaining funds of the improvements are unknown, in terms of timing and contributing parties, the successful implementation of the improvements is uncertain. The result of the fair share contribution will be that inadequate funds are collected and no improvements will be made to the transportation system.

Ind 707-33 The construction and maintenance of pavement, lighting and signalization along transportation corridors is extortionately expensive. The coordination of traffic signals is highly technical, expensive and the results are seldom worth the cost and headache.

Ind 707-34 The daily impact of this project will be equal to 3,450 cars driving by. The EIR infers that once a vehicle trip is counted, it exists and should not be counted as an increase the following year. Yet the impact of these heavy trucks on the pavement occurs with every trip, regardless of the number of years. The cumulative impact on pavement, lighting and signalization caused by this project will be immeasurable. When it is hot and a truck comes to a stop, the pavement is folded underneath, like a fault line. The pavement thins and then builds up in layers. Big-box warehouses, with high truck traffic, are causing pavement buildup in certain older areas, like Grass Valley, that is affecting drainage and the structural life and integrity of the pavement. When you add the steep slopes, the dust, the wind, ice, and rain, these trucks are going to literally rip up and degrade the streets. After the first year, this impact will not only exist, it will compound. For an EIR to judge that an impact does not exist because it was already there after the first year of production is ludicrous.

The EIR states that the negative impacts related to transportation, **even if all the improvements actually are constructed,** the majority of the impacts remain SU, Significant and Unavoidable.

Ind 707-35 **Wildfire (Section 4.13 etal.)** – The EIR finds that this project, with abatement programs and fire extinguishers, poses an LS, Less Than Significant threat to wildfires. With the razing and explosive nature of fires experienced in Redding and Paradise, Grass Valley is already on alert year round. There is no justification for the risk this project poses to Grass Valley. If the facility can't shut down, should a fire occur, who has the priority of the water first? Due to its hazardous nature, water from the mine can't be used for fire abatement.

The EIR finds this project has an LS, a Less Than Significant impact on the threat of wildfire to the community of Grass Valley.

"There is no long a fire season; there is a world-wide fire year". This comment was made by an Orange County firefighter battling urban wildfires in February, 2022.



INDIVIDUAL LETTER 707: ROXANNE SHEPHERD

Response to Comment Ind 707-1
The commenter states that project will lead to a chain-reaction of economic, health, and environmental impacts that will desolate the community. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-2
The commenter states the project will degrade or destroy private wells and that the DEIR underestimates the number of potentially impacted wells. The commenter is referred to Chapter 4.8 of the DEIR which found that impacts to groundwater supplies would be less than significant. (DEIR, p. 4.8-54.) The commenter is also referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 707-3
The commenter states that the project's water use is excessive. The commenter is referred to Chapter 4.8 and the Water Supply Assessment in Appendix N of the DEIR.

Response to Comment Ind 707-4
The commenter is concerned that the clay-lined settling pond allegedly rests on an earthquake fault. The DEIR states that over 150 years of observation has produced no records of movement in Grass Valley area mines. (DEIR, p. 4.6-31.) As discussed in Chapter 4.6-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85.

In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously identified inferred fault alignment. It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. (DEIR, p. 4.6-31.)

While the analysis shows that an active fault (activity within 11,000 years) likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

Response to Comment Ind 707-5
The commenter states that the project has severe "soil issues with erosion, permeability, and expansion", but provides no additional information on which to formulate a response. The commenter is referred to Chapters 4.6 and 4.8 of the DEIR.

Response to Comment Ind 707-6
The commenter states that the project will result in an additional 3,450 cars on the road per day but provides no evidence to substantiate this claim. The commenter is referred to the traffic impact analysis in Chapter 4.12 of the DEIR.

Response to Comment Ind 707-7

The commenter states that the project's use of haul trucks will destroy the pavement. The DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).)

Response to Comment Ind 707-8

The commenter states that the project would not provide funds for the perpetual maintenance of street lighting, traffic signals, or pavement. As discussed in Response to Comment Ind 707-7, the DEIR requires the Project Applicant to enter into agreements with Nevada County or Grass Valley to provide the project's fair share funding for applicable improvements. (DEIR, 4.12-67, 91.)

Response to Comment Ind 707-9

The commenter states that the project will not provide street or other improvements to community. The commenter is referred to Responses to Comments Ind 707-7 and Ind 707-8. Additionally, various required traffic improvement fees and fair share payments for intersection improvements are discussed in Chapter 4.12 of the DEIR.

Response to Comment Ind 707-10

The commenter states that the project would require 257 detonation per day. The DEIR analyzed the project's use of explosives and found the impact to be less than significant after implementation of Mitigation Measures 4.7-1(a-d). (DEIR, 4.7-22.)

Response to Comment Ind 707-11

The commenter states the DEIR requires a mass evacuation plan. The project does not require a mass evacuation plan for the community. The commenter is referred to Chapter 4.7 of the DEIR, which discusses Nevada County's emergency response and evacuation procedures. (DEIR, 4.7-10.)

Response to Comment Ind 707-12

The commenter states the project will likely be abandoned in five years. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-13

The commenter states that the project will only benefit the Project Applicant. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-14

This comment is introductory in nature and does not discuss the adequacy of the DEIR. The comment is noted.

Response to Comment Ind 707-15

The commenter is opposed to the project and prefers that the County selects the "No Build" Alternative to the project. The commenter's opposition to the project is noted. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 707-16

This comment discusses the Project Applicant, it does not discuss the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 707-17

The commenter states the Project Applicant misrepresents the employment benefits derived from the project. The commenter is referred to Master Response 1 – Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-18

This comment discusses the Project Applicant, it does not discuss the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-19

This comment discusses the Project Applicant and prior projects at the Brunswick and Centennial Industrial Site. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 707-20

The commenter states that the Project Applicant understates the environmental and economic impacts of the project and makes references to heavy metals at the project site and associated impacts to plants, animals, water, and humans but provides no additional detail on which to formulate a response. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter is also referred to Master Response 3 - Operator Responsibility.

Regarding the risk heavy metals pose to plants animals, water and humans, the commenter is referred to Chapters 4.3 and 4.8 of the DEIR, Master Response 20 - Conservatism of Metals Assumptions, and Master Response 8 - Mine Waste Characterization.

Regarding the risk of “sinkholes” and landslides, please see Chapter 4.6 of the DEIR. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 707-21

This comment discusses social and economic impacts of the project and does not discuss the adequacy of the DEIR. The commenter is refereed to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-22

The commenter offers no comments on Chapters 4.1 and 4.2 of the DEIR. The comment is noted.

Response to Comment Ind 707-23

The commenter references several components of the project regarding impacts to air quality but does not comment on the adequacy of the DEIR. A limited threat discharge permit is required before mine dewatering commences. The commenter is referred Master Response 35 - Discharge to South Fork Wolf Creek. The DEIR analyzes air emissions in Chapter 4.3 of the DEIR. The project’s significant and unavoidable impacts are summarized in Chapter 5.6 of the DEIR.

Response to Comment Ind 707-24

The commenter states that mitigation measures in Chapter 4.4 of the DEIR will fail unless they are fully funded and supported by community groups and that complaints will be ignored. A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

The commenter says that there are hazardous materials and discarded facilities in the County and no plans or actions are proposed to rectify these issues. The DEIR analyzes the proposed project impacts and does not analyze other sites or projects.

Response to Comment Ind 707-25

The commenter does not have comments regarding Chapter 4.5 of the DEIR. The comment is noted.

Response to Comment Ind 707-26

The commenter states that the type of soil present at the Brunswick site poses stability hazards for the project. The DEIR's Chapter 4.6 analyzes the geotechnical aspects of the project and found related impacts to be less than significant after mitigation. In regard to leaching of toxic and hazardous materials from the slopes, the commenter is referred to Master Response 8 - Mine Waste Characterization. Regarding the fault adjacent to the water treatment pond, the commenter is referred to Response to Comment Ind 707-4. Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-27

The commenter states that both project sites contain historical contamination but does not identify any inadequacies with the DEIR. The commenter also states that the project requires an evacuation plan due to the storage of explosives. Regarding the Centennial site cleanup, the commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

As stated on page 4.7-35 of the DEIR, implementation of the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment, specifically related to elevated arsenic levels in the existing mixed soil and rock fill beneath the southeastern paved area of the Brunswick Site, should the area be disturbed as part of the proposed project, potentially encountering contaminated soils, the potential presence of petroleum contaminated soils, and the presence of monitoring wells. As a result, impacts would be considered significant. Implementation of the mitigation measures 4.7-2(a) through 4.7-2(c) would reduce the above potential impact to a less-than-significant level. The commenter is also referred to Master Response 10 - Explosives, Reagents, and Brunswick Fill.

An Emergency Response and Evacuation Plan for mass evacuation specifically related to project activities is not required. The commenter is referred to Chapters 4.7 and 4.13 of the DEIR.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 707-28

Regarding impacts of the project to domestic water wells and groundwater quality, the commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 - Drought and Climate Change.

The limited threat discharge permit is required before mine dewatering commences. Water is treated before discharge and is placed first into the water treatment pond and then into the water treatment plant and is discharged to South Fork Wolf Creek. The project would have a less than significant impact to water quality in surface waters or South Fork Wolf Creek. The commenter is referred Chapter 4.8 of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

Regarding impeding or redirecting flood flows, erosion, and flooding, the commenter is referred to Chapter 4.8 of the DEIR. The DEIR includes mitigation measures to mitigate the project's impacts to all of the aforementioned topics.

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Regarding economic impacts, the commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 707-29

The commenter states the DEIR is inadequate without any additional detail. The commenter's unsubstantiated opinion is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues. The commenter states that the project will have adverse noise impacts causing sleep disturbances. The commenter is referred to Response to Comment Grp 21-130.

Response to Comment Ind 707-30

The commenter is concerned about the impacts of blasting associated with the project but does not provide additional detail. Blasting vibrations have been analyzed in Chapter 4.10 of the DEIR and are less than significant after mitigation. The commenter reiterates the concern with traffic-related impacts. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. The commenter states the DEIR acknowledges noise impacts from the project are significant and unavoidable. The construction noise from the installation of the potable water pipeline in East Bennett Road is considered Significant and unavoidable (DEIR, p. 4.10-30.) All other construction noise and noise during operations would be less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR.

Response to Comment Ind 707-31

The commenter states the project will require an increase in emergency services. Impacts to public services and utilities are analyzed in Chapter 4.11 of the DEIR. The DEIR found that impacts to public services and utilities would be less than significant. (DEIR, p. 4.11-21, 26, 28, 29, 30, and 31.) The DEIR also found that sufficient water supplies are available for the project. (DEIR, 4.11-35.) The commenter is also referred to Chapter 4.8 of the DEIR and the Water Supply Assessment in Appendix N of the DEIR.

Response to Comment Ind 707-32

The commenter states that the project will result in adverse traffic-related impacts and that the fair share contributions of the Project Applicant will be inadequate. As stated on page 4.12-98 and

4.12-103 of the DEIR, NCTC removed the SR 174/Brunswick Road intersection from their RTMF program in their 2016 Nexus Study, while Caltrans has the intersection identified as a planned, but unfunded improvement in their SR 174 TCR. Mitigation Measure 4.12-1(b) requires the Project Applicant to enter into a traffic mitigation agreement with Caltrans and provide the project's fair share contribution toward the improvements needed to improve intersection operations to an acceptable level. Because the remaining funds for the intersection improvements are unknown, in terms of timing and contributing parties, the successful implementation of the intersection improvements is uncertain. Therefore, the project's incremental impact to the SR 174/Brunswick Road intersection is considered significant and unavoidable in the DEIR. (DEIR, p. 4.12-93.)

Response to Comment Ind 707-33

This comment does not pertain to the adequacy of the DEIR. The comment is noted.

Response to Comment Ind 707-34

The commenter states that the impact of the project is equal to 3,450 cars driving by but provides no calculations or information as to the relevancy of this statement. The commenter states that traffic impacts are immeasurable. However, traffic impacts are analyzed in Chapter 4.12 of the DEIR and are based on numerous measurements such as traffic counts and traffic modeling. Various impacts from project traffic to certain intersections are less than significant, less than significant after mitigation, or in the case of SR 174 / Brunswick Road and Brunswick Road/Sutton Way, significant and unavoidable. The commenter is referred to Chapter 4.12 of the DEIR.

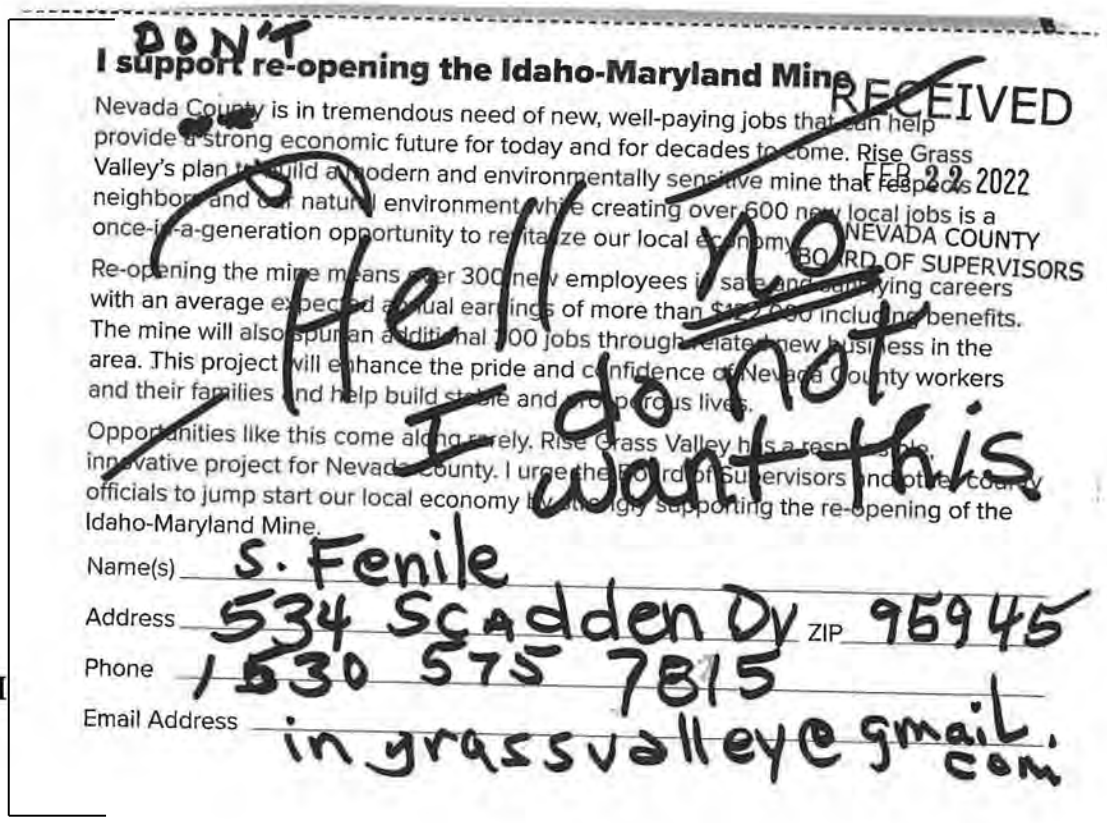
Impacts to pavement are discussed on pages 4.12-85 through 4.12-86 of the DEIR. Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between project driveway and Brunswick Road.

Response to Comment Ind 707-35

The commenter states that water from the mine cannot be used for fire abatement. However, the project treats mine water (see Master Response 35 - Discharge to South Fork Wolf Creek) and has several connections to NID fire service water (DEIR, p. 4.13-20.)

As stated on page 4.13-22 of the DEIR, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the proposed project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Implementation Mitigation Measure 4.13-2, requiring a comprehensive vegetation management plan, would reduce this impact to less than significant.

Individual Letter 708



DON'T

I support re-opening the Idaho-Maryland Mine

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $[illegible],000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Hell no
I don't want this.

Name(s) S. Fenile

Address 534 Scadden Dr ZIP 95945

Phone 1530 575 7815

Email Address in grassvalley@gmail.com

Ind
708-1

Dist 3

INDIVIDUAL LETTER 708: S. FENILE

Response to Comment Ind 708-1

The comment does not address the adequacy of the DEIR, but rather expresses opposition to the proposed project. Please see Master Response 1.

Individual Letter 709

From: Sandy Bacon <sandybacon@sbcglobal.net>
Sent: Sunday, April 3, 2022 8:46 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 709-1 I am writing about the impact the Idaho-Maryland Mine would have on us (the neighbors) that live in the area. I live 1.5 miles from the mine site and 2 miles from the dumping site on Centennial Drive. We are on a well and have no access to any other water. We cannot get NID. If the mine dewatering contaminates or dries up our well, what would we do? The spokesman for Rise Gold said "our water might taste funky and be cloudy but would still be acceptable". Acceptable to who?

Ind 709-2 My family moved here forty years ago to be near relatives and the beauty of Nevada County. My ancestors were Cornish miners here in Grass Valley. I value our heritage but re-opening the mine and the environmental impact it will have on our community is a huge mistake and one that will permanently damage our beautiful county. People live here and visit here for the peaceful beauty. How does a mine with its toxic mine waste, air pollution and noise pollution fit into the lifestyle of Nevada County. Not to mention the blasting underground in an area that has earthquakes or the dumping of minewater into our creeks.

Ind 709-3 We also have to look at the history of Mr. Mossman and his gold mining operation in British Columbia. He ran leaving massive environmental damage and law suits. Do we really think he would not do the same in our county if things got difficult.

Thank you,

Sandra Bacon

1

INDIVIDUAL LETTER 709: SANDRA BACON

Response to Comment Ind 709-1

For the commenter's well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 709-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns about the proposed project. Please see Master Response 1. For toxic mine waste concerns, please see Master Response 8 – Mine Waste Characterization; for the generally noted air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for generally expressed noise and blasting concerns, please see Chapter 4.10, Noise and Vibration; and for dumping of mine water into creek, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 709-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 710



Matt Kelley
Senior Planner
County of Nevada
Community Develop Agency
950 Maidu Ave, Ste 170
Nevada City, CA 95959-8617

February 20, 2022

Re: Idaho-Maryland Mine Project Draft EIR, SCH # 2020070378

Mr. Kelley,

I am responding with a few of my concerns regarding the DEIR for the Idaho-Maryland Mine Project and its potential impacts on the residents of Nevada County.

Ind 710-1

#1: The current zoning of the land appears to be Light Industrial, M1 which is defined as "For the production, repairing, distribution, and warehousing of goods and equipment, along with support businesses and services. Uses should provide for buffering from adjacent land uses to minimize incompatibility and should have convenient, controlled access to arterial or major collector roads without passing through residential areas.
The zoning indicates that "Any other intensive industrial use not allowed in the BP or M1 Districts" are Not Permitted.

The access between the Idaho-Maryland and Centennial sites is along rural, residential zoned properties, contrary to the Light Industrial zoning. Mining, with the subsequent blasting, rock crushing, and hauling certainly seem to be an 'intensive industrial" use, which is not permitted for the sites.

These two items should be included within the list of impacts which can not be mitigated.

Ind 710-2

#2: The abandoned mine tunnels have created paths for water flow for decades that residents in the watershed of the mining property have come to rely upon. If the tunnels had not been created, or they had been continuously dewatered since their inception, water which now serves other properties potentially miles away from the tunnels would have failed to obtain water reliant upon this water. The owner of the mineral rights owns the minerals, but do they have the right to divert this water for non-beneficial uses (dumping into a creek) when an unknown number of properties rely on this water source?

Ind 710-3

The DEIR addresses that "Under existing conditions, the effect of this drawdown is limited to the East Bennet Road area." (Page 4.8-54, second paragraph). This seems a grossly oversimplified conclusion that does not account for the distance that underground water can travel. Page 3-15, fourth paragraph, indicates that static levels of groundwater is 260' below ground surface. That static level is taken at an elevation of ~2700'. This needs clarification as to how drawdown at this elevation, with such a low static level of ground water, could not affect properties below 2700' elevation that may be served by that same groundwater.

#3: Blasting underground can disrupt and forever change the fractures that homeowners downstream rely on to transport the underground water to their wells. Information within the DEIR that addresses the potential alteration of existing rock fractures that transport underground water does not seem to be sufficient or the potential impact to houses and communities reliant upon these groundwater sources.

Ind 710-4

Page 4.8-48 indicates that 'new mining activity would all occur at depths that are comparable to or much deeper than the historic mine workings." Thus, any blasting will be occurring below existing fractures which deliver water to residents well below the location of the mine. Again referring to the DEIR indications that static water is at 260', that is an area of rock formation and fractures that could be as much as 1000' in depth that could be impacted by blasting. The potential footprint of properties within the zone can't be estimated if there is not an accurate map of the underground aquafers and watercourses. The DEIR needs to include the potential impact to properties well beyond the mineral rights boundaries.

The DEIR needs to exponentially expand its scope of impact to wells within the region not just within the mineral rights.

Ind 710-5

#4: California is already experiencing insufficient energy production and availability compared to demand during heavy use periods. Pacific Gas and Electric Company has announced plans to move their residential customers to time of use rate schedules to encourage less energy usage during the hottest part of the day. The DEIR is lacking in any options for including renewable energy within the scope of the project to reduce the impact of the significant energy proposed to be used by the project.

A project alternative utilizing renewable energy sources should be included within the DEIR.

Ind 710-6

#5: The DEIR is working off assumptions regarding the Centennial Site and eventual cleanup of the site. Even if the site is cleaned up and the Department of Toxic Substance Control (DTSC) issues a No Further Action letter, there are still ongoing requirements for sites where the toxic substance is not removed from the site to a remote disposal location. Since that process is still moving forward with California DTSC the stipulations, land use covenants and Operations and Maintenance Agreements are unknown at this time. Per page 1-7, second to last paragraph "...even if the Centennial Clean-Up Project is not completed within the term of the mining permit,...in which case, material from the Idaho-Maryland Mine Project would not be placed on the Centennial Site.".

Since many of the figures and calculations are based upon the use of the Centennial Site, this DEIR needs to either be postponed until the actual available level of use of the Centennial Site is known or the use of the site should be excluded as part of the project. Either the Centennial site is part of the project, which should then incorporate the cleanup as part of the project, or the Centennial site is not within the scope of the project and all calculations on GHG emissions and other assumptions regarding availability of the Centennial Site need to be removed from the DEIR.

Ind 710-7

#6: Regarding the Water Treatment Plant and pond, the DEIR needs to have additional information on how the level of the pond will be regulated to prevent emergency overflows into South Fork Wolf Creek, if there are alternatives to dumping the water into South Fork Wolf Creek, and whether the levels of water introduction into South Fork Wolf Creek will have an adverse effect on downstream properties during storm events.

Per page 3-15 the clay-lined pond will have a capacity of approximately 40 acre feet (40 af). Per page 3.17 the pond will have an approximately 30 af working capacity. If the mine is to be dewatered at 2,500 af in a 6 month period (page 3-15), that is equivalent to 13.66 af per day. At 13.66 af per day that only provides a capacity of 2.15 days for the pond. This brings up concerns which should be addressed within the DEIR regarding:
a) What is the settling rate is for the water and how fast is the water treated and released?
b) What happens of the Water Treatment Plant is shut down for any length of time? Will the pond overfill and flow into South Fork Wolf Creek or is there an emergency shut-off that halts mine dewatering to protect the creek?
c) Will the Water Treatment Plant be staffed by a licensed Treatment Plant Operator 24/7 to address any emergencies and monitor the systems?
d) If backwash material is to be placed into the same pond, this will further reduce the capacity of the pond, shortening the period of time that water can be pumped into the pond.

Ind 710-8

The numbers used to discuss dewatering are inconsistent. At one point, the DEIR indicates 2,500 acre-feet of water will be removed over a 6 month period. At another the DEIR indicates that 5.6 cubic-foot-seconds (cfs) will be removed. That is a difference of 433 af of water. During the extreme drought conditions California is currently experiencing, clear water impact information is even more important.

Ind 710-9

The DEIR needs to have a more precise and consistent reference to the water amounts to be removed from the mine both before and during operation should be provided, using a consistent unit of measure, or provide a table showing acre-feet, cubic foot/second, and gallons per minute per day for each type of event to clarify water usage.

Ind 710-10

The DEIR should also address treated water discharges into the creek during abnormal rain events. While the DEIR addressed surface run-off analysis, with treated water discharges being estimated from 1.9 cfs to as high as 5.6 cfs, which are NOT part of the surface runoff analysis, there needs to be additional research and alternatives to treated water discharges into the creek during storm events.

Ind 710-11

The DEIR did not discuss opportunities for beneficial use of the water from dewatering the mine. There should be a discussion on opportunities to re-introduce the treated water back into the ground, either through storage or tapping into an underground aquifer.

Ind 710-12

The DEIR should discuss the possibility of another event such as what occurred at the Siskon Mine in North San Juan. What would be the ramifications of hitting an underground 'river', how would the overflow of water be mitigated? Are there tools available to help prevent such an event from occurring at this site? North San Juan has a significantly lower population than the Grass Valley area where the Idaho-Maryland Mine is located. The footprint of dewatering a major underground 'river' could impact properties for miles.

Ind 710-13

#7: Within the Summary of Impacts and Mitigation Measures:

I would request that the determination of LCC (less than cumulatively considerable) be reviewed for Impact 4.2-6. Nevada County already has numerous days where the pollution from the valley impacts our area, raising the AQI numbers to unhealthy levels. How can the increase of the levels of GHG being estimated by this size and longevity of this project not be a significant impact with needed mitigations?

Ind 710-14

The determination of 4.3-9 (Results in the inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency) as being Less than Significant is not consistent with the findings within the DEIR. The project is a huge net energy user during a period when State and local governments are requiring more renewable energy usage and less consumption. The project destroys Nevada County's energy use goals and that should be addressed to bring the project within the County and State goals.

Ind 710-15

I also object to the findings of 4.7-5 and 4.8-6 as less than significant. All these findings need to be reviewed and more fully discussed as to their impact over a span of 80 years.

Ind 710-15

Why are the mitigations for construction only? This project has an 80-year expected life-span. Mitigations need to be ongoing for all aspects of the project and should include the potential to replace equipment run on petroleum products with alternatives that will lessen the 80-year cumulative impact on the environment and the community.

Ind 710-16

Thank you for the opportunity to comment on this DEIR. I am by no means an expect on review of such documents, but this draft appears to have numerous areas that have not been addressed at all or the focus has been on meeting the letter of the law as opposed to the actual environmental impact upon the community, as evidenced by the number of project comments that have been deemed less than significant and not worthy of further discussion. I trust that more expert eyes then mine will point out many more of these deficiencies so that Nevada County can have a complete EIR, with adequate discussion that is representative of the valid concerns of the region and its citizens.

Sandra Hewston
19919 Casa Loma Drive
Grass Valley, CA 95945

INDIVIDUAL LETTER 710: SANDRA HEWSTON

Response to Comment Ind 710-1

The commenter states that the current zoning of the project site does not allow for mining. As discussed on page 4.9-16 of the DEIR, Subsurface mining is allowed in all base districts subject to approval of a Use Permit. Surface access to subsurface mining, including vent and escape shafts, is allowed in the AG, FR, M1, M2, P, and PD base districts subject to approval of a Use Permit. Surface mining is allowed in the AG, FR, M1, M2, P, PD, and TPZ Districts and where the property is zoned ME, subject to approval of a Use Permit and Reclamation Plan.

Response to Comment Ind 710-2

The commenter states that residents situated in the watershed depend on the groundwater in the Idaho-Maryland Mine to supply private wells. Water present in the underground mine workings does not supply domestic water wells. Rather the regional groundwater flow supplies domestic water wells. Impacts to domestic water wells from mine dewatering has been analyzed in the DEIR. The DEIR found that the project's impacts to groundwater supplies from the dewatering of the mine would be less than significant. (DEIR, p. 4.8-54.) The commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR.

Response to Comment Ind 710-3

The commenter states that the DEIR underestimates the number of private wells potentially impacted by the dewatering of the mine. As stated on page 4.8-19 of the DEIR, the static water level in the New Brunswick shaft and underground mine workings is approximate 2,497 feet msl to 2,502 feet msl. Regarding impacts to domestic water wells, the commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-4

The commenter states that the DEIR underestimates the scope of the impacts to groundwater supplies and must be expanded beyond the mineral rights boundaries. As discussed on pages 15-19 of Appendix M, numerous holes must be drilled and blasted sequentially into a void (the free face) in order to fracture rock and create mining excavations. Any blast damage to surrounding rocks, such as cracks, would be limited to a few feet surrounding the excavation. Therefore, blasting cannot "damage the aquifer" or cause draining of surface water and groundwater.

In regard to the hydrogeology model and area of potential impact to domestic water wells, the commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-5

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project. The commenter also states that a project alternative that utilizes solar should be included in the DEIR. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon

energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. (DEIR, Appx. E.1.)

Response to Comment Ind 710-6

The commenter states that the cleanup of the Centennial Industrial Site should be included in the DEIR. The commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA and Response to Comment Grp 21-122.

Response to Comment Ind 710-7

The commenter asks how the level in the pond will be regulated to prevent emergency overflow into South Fork Wolf Creek and what happens if the water treatment plant shuts down for any length of time, and whether the pond would overflow and flow into South Fork Wolf Creek under this circumstance. The water treatment plant is designed for a maximum treatment rate of 2,500 gallons per minute and all equipment would be in place to increase treatment to this capacity at any time it was necessary. (DEIR, p. 4.8-42.) Pumps in the underground mine pump to the water treatment pond and can be turned on and off as necessary by mine employees. Supervisors on the surface can communicate with underground and surface workers though radio communications to provide necessary instructions. The water treatment pond provides water storage capacity so that the mine pumping and water treatment are not required to be identical but would average the same rates over a day or several days. As discussed in Section 4.5 of Appendix K.2, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. (DEIR, p. 4.8-74.) This capacity allows time for any necessary maintenance or repairs to the water treatment plant without curtailment of underground dewatering. As discussed in Section 5.4 of Appendix K.4, the removal of sludge from the water treatment pond can be achieved with slurry pumps. Therefore, the periodic removal of settled solids would not require the curtailment of mine dewatering. In addition, the underground mine has a substantial capacity if it were ever necessary to curtail water pumping for an extended period of time. An estimate of the volume of existing mine workings is provided in Section 3.3.3.2 of Appendix K.2, with the lower levels (2300 – 3280 level) having a volume of 84-acre ft and the entire mine having a total volume of 1,183 acre-ft. At an average inflow rate of 850 gpm (3.75-acre ft per day) it would take approximately 22 days for the lower levels of the mine to flood and approximately 314 days for the entre mine to flood. The site drainage plan for the Brunswick site routes the majority of precipitation run-off from the site to the storm water detention basin, not the water treatment pond, as shown in Drawing H-4 of Appendix K.5. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from an extreme storm event. As discussed above, the pond would not overflow due to maintenance or precipitation events of at least a 100-year storm. (DEIR, p. 4.8-74.)

The commenter asks what the settling rate is for the water. As discussed above, at the maximum mine dewatering rate of 2,500 gpm, the pond has the capacity to hold the volume of water that would be dewatered during two days of pumping. (DEIR, 4.8-74.) At the maintenance dewatering rate of 850 gpm, the pond has the capacity to hold the volume of water that would be pumped over more than six days. (*Ibid.*) The water treatment plant also incorporates media filtration. As stated on page 5-3 of Appendix K.4, during initial NBS shaft dewatering, the total suspended solids (TSS) in the underground water are expected to be low, and data presented by EMKO from

their sampling events shows suspended solids below laboratory detection limits (<5 mg/L) in the water currently flooding the shaft (EMKO 2020, Table 3-6). During active mining, the amount of TSS in the water is expected to increase and will be heavily influenced by the effectiveness of the underground settling sumps. Assuming that water discharged from the mine has suspended solids of 100 mg/L, which are subsequently reduced by settlement in the pond to the 20 mg/L treatment goal (EMKO 2020 Table 4-10), and an average flow rate of 850 gallons per minute, the mine would produce approximately 37 tons per year of silt-born sludge. The requirements of treated water discharge include requirements for total suspended solids and ensure that total suspended solids of water released to South Fork Wolf Creek meets water quality goals. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter asks how quickly the water will be treated and released. Appendix K.4 of the DEIR describes the design and operation of the water treatment system. The treatment plant would be sized to treat the maximum pumping rate from the mine of 2500 gpm (3,600,000 gallons per day). The initial dewatering of the mine requires the pumping of the water volume currently in the flooded mine as well as groundwater inflow into the mine. If this maximum pumping rate is not achieved during initial dewatering due to operational concerns, the duration of time to complete initial dewatering would be extended. The pumping rates during initial dewatering would be determined by company management and supervisors in accordance with relevant permit requirements and operational concerns. The discharge from the mine into South Fork Wolf Creek will be governed by the Central Valley Regional Water Quality Control Board, who will have enforcement authority over discharges from the mine. Please see Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 32 - Temperature of Mine Water Discharge.

The commenter asks if the water treatment plant will be staffed by a licensed water treatment plant operator 24/7. The water treatment plant is not a public water system or potable water treatment facility and therefore does not require licenced operators. However, water treatment plant operators will be trained to operate the water treatment plant and the plant will be staffed 24 hours per day, 7 days per week. Numerous trades people such as electricians and millwrights are available at the site to assist with mechanical repairs and maintenance.

The commenter asks if backwash material would be placed into the same pond. As stated on page 4-2 of Appendix K.4, a mechanical solids separation process, such as centrifugation, or belt or drum filters, will be installed onshore in order to segregate the solids from the pyrolusite media backwash stream that will be returned to the clay-lined pond. In this manner, the pond will remain unaffected by the solids generated by backwash events.

Response to Comment Ind 710-8

The commenter states that DEIR is inconsistent with regard to the volume of water to be pumped from the mine. The commenter states this information is necessary during a drought. Flow quantities in the DEIR are rounded and 2,500 gallons per minute is equivalent to 5.57 cubic feet per second, which is rounded to 5.6 cubic feet per second. (DEIR, p. 4.8-54.) The commenter is referred to Master Response 16 - Drought and Climate Change.

Response to Comment Ind 710-9

The commenter states that more precise and consistent references to flow rates are needed in the DEIR. Water flows are estimates and the level of precision requested by the commenter is not required for the analysis of the DEIR. Please see Response to Comment Ind 710-8.

Response to Comment Ind 710-10

The commenter states that the DEIR must discuss discharges to South Fork Wolf Creek during abnormal rain events. The DEIR discusses treated water discharge into South Fork Wolf Creek during normal and abnormal precipitation events. As stated on page 4.8-70 of the DEIR, at the Brunswick Industrial Site, a detention basin would be constructed at the downstream toe of the engineered fill placement slopes, above South Fork Wolf Creek (see Figure 4.8-15). The detention basin for the Brunswick Industrial Site is sized to detain storm flows to compensate for the quantity of treated mine water discharged to South Fork Wolf Creek, in addition to compensating for increased runoff from potential future industrial development of the site. Peak storm flows at both the Centennial and Brunswick Industrial Sites would be reduced to levels less than existing conditions peak storm flows due to the detention basins that would be constructed below the engineered fill areas.

Response to Comment Ind 710-11

The commenter states that the DEIR is lacking a discussion of beneficial uses of treated water from the mine. As stated on page 2 of Appendix N, the mine water flow would have a positive effect on water supply. NID could adjust its flows upstream to use the extra water available downstream if it desired to. The commenter suggests that the water could be re-introduced back into the ground. Some water may recharge into the ground as its flows in South Fork Wolf Creek and then Wolf Creek. However, the recharge of most or all of the mine water discharge back into the low permeability fractured rock would be difficult if not impossible and require many injection wells throughout the mine area and the associated infrastructure such as wells and pipelines. The benefit of such an endeavour is not apparent and is not required for the project to reduce significant impacts to a less than significant level.

Response to Comment Ind 710-12

The commenter states that the DEIR must include discussion of a possible underground river to avoid the impacts that occurred at the Siskon Mine. No “underground rivers” are present in the mine area and proposed mining is in rock unlike the San Juan Ridge mine, which was a near surface underground gravel mining operation. The commenter is referred to Chapter 4.8, Appendices K.2 and K.3 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 710-13

The commenter requests that the determination of less than cumulative considerable for Impact 4.2-6 is further analyzed given the poor air quality of the region. The commenter is referred to Master Response 18 - Air Quality Thresholds, and Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 710-14

Compliance of the project with Energy Action Plan strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project’s reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions overtime. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of

electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. Please also see Response to Comment Agcy 8-17.

Response to Comment Ind 710-15

The commenter objects to the findings of 4.7-5 and 4.8-6 in the DEIR but provides no specific reason or evidence for this objection. The comment noted.

Response to Comment Ind 710-16

Please see Master Response 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.

Response to Comment Ind 710-17

The commenter concludes that the DEIR is generally inadequate. The comment is noted for the decisionmakers.

Individual Letter 711

From: Sara Brownw
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project
Date: Monday, February 7, 2022 7:31:29 AM

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Dear Mr Kelley,

Ind 711-1

I am very worried about the effects of the mine on the stability of the lands through and under which the project will encompass. I can clearly visualize worrisome disruptions in underground water resources affecting property owners, watersheds, and ecosystems that are dependent on what is established now. I don't think it's wise to wreak havoc on our community for the financial gain of a mega corporation. We are just recovering from the environmental tragedy of the gold mining era, and now having to learn to cope with the threat of wildfire: why would we choose to add to the stressors of this community?

Please consider the effects of such an industrial project on the environment and its inhabitants: plants and animals, humans included.

Thank you,

Sara Cooper Brownwood

INDIVIDUAL LETTER 711: SARA BROWNWOOD

Response to Comment Ind 711-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For concerns related to underground water resources and ecosystems, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, Master Response 32 – Temperature of Mine Water Discharge, Master Response 35 – Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Fork Wolf Creek.

Individual Letter 712

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-4 P33 104**********ECRWSH**C002
Sarah Miller Lazard
10331 Banner Lava Cap Rd
Nevada City, CA 95959-3323

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RECEIVED
FEB 25 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1955. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.



Please fill out and send back to us your support for the Idaho-Maryland Mine

Ind 712-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) NO I BELIEVE THIS
Address ZIP
Phone MINE SHOULD BE STOPPED
Email Address
I AM A HOME OWNER. BUILDING OWNER, BUSINESS OWNER

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

INDIVIDUAL LETTER 712: SARAH LAZARD

Response to Comment Ind 712-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 713

From: Sarah Bliss <sarahblisss@gmail.com>
Sent: Monday, April 4, 2022 4:34 PM
To: Idaho MMEIR
Subject: Stop the Idaho Maryland Mine

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To Whom It May Concern:

Ind 713-1 I am writing to share that I strongly oppose Rise Gold's unnecessary reopening of the Idaho Maryland Mine. I moved from the Bay Area in 2020 and now live near downtown Grass Valley. One of the things I love most about living in Grass Valley is how peaceful and clean it is.

Ind 713-2 When I imagine our beautiful little town being taken over by the mine, it breaks my heart. This mine would operate 24/7 for up to eighty years and has the potential to bring so much pollution, toxicity, and sickness to our community. The constant dust, carbon emissions from mine owned trucks, and inevitable toxic spills will literally make our residents ill. Nevada County already has a high rate of deaths due to chronic lung disease and having the mine here would only make it worse.

Ind 713-3 Our power grid is already so strained and the Idaho Maryland mine would call for massive amounts of energy usage. Why should we prioritize corporate greed over our own citizens? I know my ability to work from home has been impacted several times by loss of power. Knowing that the mine would be taking more energy from our grid for profit is upsetting to say the least.

Ind 713-4 The CEO of Rise Gold has been proven to have a negative track record in Canada, where tribal waters were polluted and left for someone else to clean up. Why would we give such an irresponsibly run company a chance to cause harm to our beloved community?

Finally, we all know water is a scarce and precious resource. Rise Gold would be pumping out millions of gallons per day for decades. Our local flora and fauna (not to mention private residents with wells) deserve more reverence and respect.

Ind 713-5 I am strongly opposed to the Idaho Maryland Mine and know that allowing Rise Gold to have a place in our town would be a grave mistake. Please don't allow harm to come to our community in this way. Thank you for your time and consideration.

Best,
Sarah Snyder & Family

INDIVIDUAL LETTER 713: SARAH SNYDER

Response to Comment Ind 713-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 713-2
The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For concerns related to dust and airborne chemicals, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; for concerns related to exhaust, please see the health risk assessment (DEIR Appendix E.1), the results of which are incorporated into Chapter 4.3; and for concerns related to spills, please see Chapter 4.7, Hazards and Hazardous Materials.

Response to Comment Ind 713-3
The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.11, Public Services and Utilities, for additional information regarding the project's impact on electricity supplies. As discussed on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the project would be supplied by the existing 12kV PG&E line along Brunswick Road. The BRUNSWICK 1102 Circuit (Circuit), which would serve the project, has a rating of 13.26 MW. The project's total connected load is estimated at approximately 10 MW, with a net load of approximately 6 MW. As of the year 2021, the Circuit operates at 5.15 MW, or approximately 39 percent of the Circuit's maximum capacity. Based on PG&E's usage projections, the Circuit load is anticipated to drop to approximately 4.74 MW by the year 2025. Considering the project would generate an electric load of approximately 6 MW, and the Circuit currently provides 5.15 MW, the Circuit capacity would increase to 11.15 MW following implementation of the project. The increase in wattage associated with implementation of the project would remain within the Circuit's capacity of 13.26 MW and, thus, the Circuit would have available load capacity to accommodate the project

Response to Comment Ind 713-4
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 713-5
For concerns related to groundwater use and effects on local flora and fauna, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 33 – Groundwater Dependent Vegetation. The commenter's concerns and opposition to the proposed project are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 714

From: Sasha Soukup <astralweekend.shop@gmail.com>
Sent: Monday, April 4, 2022 9:59 AM
To: Idaho MMEIR
Subject: Comments re: DEIR on proposed mine

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Hi there!

Ind 714-1 I am a 16 year Grass Valley resident, business owner, local musician, and social media activist, and I am writing regarding the DEIR on the proposed Idaho-Maryland Mine.

I live two miles from the mine site (at Brunswick) and I am extremely concerned in particular about the heightened noise levels, the change of traffic volume, and the long term air quality impact that could result from the mine operations. I don't believe that the DEIR adequately addresses these issue- for example, it cites that the noise resulting from the mine is in the "acceptable" decibel level, when in fact the decibels cited as acceptable are several times the level of a garbage truck collecting trash. This is absolutely not acceptable, and I question how this threshold was established.

I also question the plan to measure air quality in the region of the mine- the DEIR doesn't seem to include the totality of air pollutants from mine operations. As someone with asthma who already struggles during fire season with the poor air quality in Nevada County, I want to know that any new industrial activity that contributes particulate matter and exhaust to the air is being measured accurately and thoroughly.

Ind 714-2 These are just a few of the areas in the DEIR that seem inaccurate and incomplete to me, and I urge you to demand a new DEIR that is done correctly.

Thanks for your time,

Sasha Soukup

--
Shop: www.AstralWeekend.com
Cel: 925-518-0315

1

INDIVIDUAL LETTER 714: SASHA SOUKUP

Response to Comment Ind 714-1

Air pollution is addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Regarding changes in traffic volumes, please refer to Chapter 4.12, Transportation.

Response to Comment Ind 714-2

The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

The commenter otherwise suggests that the DEIR contains inaccuracies and is incomplete but provides no specific examples. Thus, a specific response is not possible.

Individual Letter 715

From: Patty Marsters
To: Idaho MMEIR
Subject: IdahoMarylandMine DEIR
Date: Monday, February 21, 2022 8:33:17 PM

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To: Matt Kelley, Sr. Planner

Nevada County Planning Dept.

950 Maidu Ave. Suite 170

Nevada City, CA 95959-7902

Ind 715-1 As a member of the Ironhorse Townhome Association, we agree with the Board of Directors' opposition to the proposed IMM project and the impacts identified in their response to the DEIR.

Ind 715-2 In California, water is so scarce. There can be no justification for risking the supply or quality of well and groundwater. Increasing the consumption of NID water to replace lost or tainted well water is not a mitigation of Impact 4.8-2, it is a negative impact in itself.

Ind 715-3 According to the DEIR Executive Summary, the "No Project/No Build" alternative is environmentally superior.

Ind 715-4 RISE suggests they're doing the community a favor in the short term by creating jobs and in the long run by preparing more land for industry. But does the EIR fully investigate the socio-economic impacts (Policy 17.10)? This isn't the first time a town or county has been tempted to try to raise revenue by adding jobs and businesses. Before allowing IMM to proceed, consider the lesson learned throughout the rest of the state that adding more jobs results in higher prices and more competition for housing (i.e. less available housing).

The IMM project is not a good use of our environmental or social and physical resources.

Sincerely,
Scot and Patty Marsters
136 Ironhorse Place
Grass Valley, CA

INDIVIDUAL LETTER 715: SCOT AND PATTY MARTSERS

Response to Comment Ind 715-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 715-2
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 715-3
The commenter does not address the adequacy of the DEIR, but rather restates its finding that the No Project (No Build) Alternative would be the environmentally superior alternative.

Response to Comment Ind 715-4
The comment pertains to economic and social issues - please see Master Responses 1 and 2.

Individual Letter 716

From: JS Peterson <peterson.js@gmail.com>
Sent: Wednesday, March 23, 2022 6:42 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine proposal

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Ind 716-1

I am totally opposed to opening up the mine which my father worked at in the 1950s.

There EIR is totally biased and corrupt. Why the County is relying on the developer for information is totally corrupt. They are only giving you info that benefits their cause.

We don't want pollution!

This penny stock foreign corporation is just out to scam folks for profit.

Their motto is screw Nevada County and run back to Canada with the profits.

Turn down the Rise scam.

Scott Peterson
95945

INDIVIDUAL LETTER 716: SCOTT PETERSON

Response to Comment Ind 716-1

The commenter suggests that the DEIR is biased but does not provide any evidence to support this spurious claim. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 717

From: Sean Johnson <seanspuppet@gmail.com>
Sent: Sunday, April 3, 2022 8:04 PM
To: Idaho MMEIR; DEIRcomments@cea-nc.org
Subject: No Mine

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Dear Board of Supervisors,

My name is Sean Johnson, I'm a of Grass Valley and I'm writing to express my opposition to the reopening of the Idaho Maryland Mine.

Ind 717-1 I've reviewed the Draft Environmental Impact Report and I feel it is woefully inadequate. I have three main issues that I'd like you to address. First, the Canadian company attempting to reopen the mine has boasted that the mine will bring 600 jobs to the area. The DEIR states that the mine will have no impact on traffic, I'd like to know exactly how you can add this many jobs to the region and have no impact on traffic. Second, as a resident that relies on well water, I feel the

Ind 717-2 DEIR doesn't fully address how the mine will not have a negative impact on local wells or local water quality. Please let me know how draining the water from the mine and dumping water into local streams and rivers won't have a negative impact on wells and our local environment. Finally, as someone that moved to this area to enjoy the peace and quiet I'm concerned about noise pollution. The DEIR doesn't fully explain how five years of construction and a fully operational mine will have no impact on noise pollution. Please provide more details on how mine construction

Ind 717-3 and operation won't have an impact on noise in the area.

I look forward to receiving your response.

Sincerely,
Sean Johnson

INDIVIDUAL LETTER 717: SEAN JOHNSON

Response to Comment Ind 717-1

Traffic is evaluated in Chapter 4.12, Transportation, of the DEIR. As noted therein, the DEIR does not claim that the proposed project would have no impact on traffic; rather, impacts to certain intersections were concluded to be significant. Nevada County, as the lead agency, will consider such impacts when determining whether to approve the project.

Response to Comment Ind 717-2

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 717-3

Noise is addressed in Chapter 4.10. The DEIR does not claim that 5 years of construction will have no noise impacts. Rather, the DEIR finds that construction noise from installation of the potable water pipeline along East Bennett Road would have a temporary significant and unavoidable noise impact to nearby residents, even after implementation of mitigation.

Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Individual Letter 718

From: Shannon Ross <shannon.ross22@gmail.com>
Sent: Monday, April 4, 2022 9:29 AM
To: Idaho MMEIR; deircomments@cea-nc.org
Subject: Draft EIR - Inadequate

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Attention Nevada County Supervisors & Planning Commission:

Ind 718-1 The Draft EIR is completely inadequate. Having been a court reporter for 35 years and listening to many hearings on environmental issues, it is from my experience that the only this this Draft EIR will lead to is a lawsuit against the county.

Ind 718-2 First off, the process did not include discussions or information from local tribes. It is beyond belief that the leaders of this county would tear down this town with contaminated air, destroy wildlife corridors and habitat, and basically turn a wonderful tourist destination into a town that has the look and feel of a burned out old Appalachian mining town.

Ind 718-3 This is not 1920. As a community we all have worked to create a beautiful historical town where people love to live and enjoy the outdoors.

Ind 718-4 The Draft EIR does not devote enough thought or research into Air Quality and what 24-hour Noise will do to our health. It does not consider native people. You have to pretend global climate change is NOT A THING to understand how they put the studies together.

Ind 718-5 It is not possible that a snake will change it's stripes, and to allow a foreign company to come into the beautiful foothills of California with this crappy Draft EIR and believe that they will be good for their word is the most insane thing this county can do. You will destroy our homes and our city.

Ind 718-6 The Draft EIR does not address water adequately. To say that only 30 wells will be affected, is ludicrous. You don't have to be a scientist to understand this is just false.

Ind 718-7 There are so many flaws in the Draft EIR, you must do a new one that takes into account: the health of the citizens of this county, the water, the air, and native peoples and lots more science on the destruction of our wild birds and animals that will all be destroyed if you allow this mining company in here to do some ancient form of gold mining and take us back to the 1850s.

1

You people disgust me that you would ruin our town like this.

Thank you for your time,

Shannon M. Ross
Certified Shorthand Reporter, No. 8916
530-570-9573
shannon.ross22@gmail.com

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INDIVIDUAL LETTER 718: SHANNON ROSS

Response to Comment Ind 7

The commenter states that the DEIR is complete inadequate but provides no evidence to support this spurious claim. Please see Master Response 1. See the below responses to more specific comments.

Response to Comment Ind 718-2

Please see Chapter 4.5, Cultural and Tribal Cultural Resources, and, specifically, the following excerpt from page 4.5-21 of the DEIR:

> […] InContext contacted the NAHC on September 10, 2019 to request a search of the Sacred Lands File for tribal cultural resources within or near the project area. The results of the Sacred Lands File search were negative, which indicates that known cultural resources do not exist on the project site.[2] In addition, InContext contacted each of the following Native American tribes with the potential to have knowledge of cultural resources in the project area:
>
> - Colfax-Todds Valley Consolidated Tribe;
> - Tsi Akim Maidu;
> - United Auburn Indian Community of the Auburn Rancheria (UAIC); and
> - Nevada City Rancheria Nisenan Tribe.
>
> In an effort to gather data regarding cultural resources of importance to these entities that could be affected by the project, the above parties were contacted via regular mail, email, and telephone between September 16, 2019 and December 16, 2020. Reponses were not received from any of the above tribes.
>
> On November 25, 2019, Nevada County sent project notification letters with offers to consult pursuant to AB 52 to the Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, Nevada City Rancheria Nisenan Tribe, and UAIC. The Tsi Akim Maidu Tribal Council, Shingle Springs Band of Miwok Indians, and Nevada City Rancheria Nisenan Tribe did not respond within the 30-day consultation period. The UAIC responded on December 18, 2019, and requested consultation and copies of the Cultural Impact Report, technical reports, requests for and results of records searches, and Geographic Information System (GIS) Shapefiles. The County provided such information. In addition, the UAIC noted that they are not aware of any Native American archaeological sites in or near the project site.

As presented above, consistent with CEQA Guidelines and Assembly Bill 52, as part of the DEIR process, local tribes were notified and invited to consult on the proposed project, and such information was presented in the DEIR.

Response to Comment Ind 718-3

For the commenter's general air pollution concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. Regarding impacts to wildlife corridors and habitat, Impact 4.4-4 included in Chapter 4.4, Biological Resources, of the DEIR assessed whether the

[2] InContext. *Historic Properties Inventory and Finding of Effect for the Idaho-Maryland Mine Project, Nevada County, California*. December 2020.

proposed project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Known migratory deer ranges outlined in the Nevada County General Plan were reviewed as part of the DEIR for deer migration corridors, critical range, and critical fawning areas. According to the Migratory Deer Ranges Nevada County General Plan map, the Centennial Industrial Site and Brunswick Area are located in an area of potential Deer Winter Range. However, field surveys conducted for the proposed project did not record any observations of deer. In addition, the DEIR noted that the Centennial Industrial Site and Brunswick Area do not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas. Based on the analysis included in the DEIR, the proposed project was determined to have a less-than-significant impact related to interfering substantially with the movement of any wildlife.

Please refer to Chapter 4.4, Biological Resources, for general concerns related to habitat impacts.

Response to Comment Ind 718-4

The commenter states that the DEIR does not devote enough thought or research into air quality, but provides no evidence or examples to support this assertion. Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, provides a very detailed analysis of the proposed project's potential air quality impacts. Chapter 4.3 is supported by the technical air quality analysis included as Appendix E.1 to the DEIR. Appendix E.1 also includes the results of a detailed health risk assessment performed in accordance with State guidance. Please see also Master Responses 18 – Air Quality Thresholds, and Master Response 19 – NSAQMD Criteria Pollutant Thresholds During Operations.

For the concern related to 24-hour noise operations, please see Response to Comment Grp 21-130.

Global climate change is addressed in detail in Chapter 4.3 of the DEIR. Please also see Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits.

Response to Comment Ind 718-5

Please see Master Response 1 and Master Response 3.

Response to Comment Ind 718-6

Please see Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 718-7

Please see the above responses to comments.

Individual Letter 719

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

March 27, 2022

TO:
Matt Kelley - Senior Planner / Project Manager
AND:
Nevada County Planning Commission
RE:
No Mine in Nevada County
Draft Environmental Impact

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine! I moved to Nevada County in 2001 from Sacramento. We wanted a life living in the trees and a like-minded group of people to embrace the small town, healthy, happy, simpler lifestyle of Grass Valley and Nevada City!

Ind 719-1 The mine and reopening it cannot possibly serve our people of this county. It only serves the money hungry, out of country Rise Mine investors who want to take the gold and run leaving us to deal with all the toxic waste - AIR POLUTION, ENERGY USAGE, CLIMATE CHANGE, DRAINS OUR WATER and PUTS GROUND WATER AT RISKS - TRAFFIC, DUMPING MINE WASTE and NOISE.

(over)

Please
please
please

NO
IDAHO
MARYLAND
MINE

Thank you!

SHAR MCLEOD
12430 SQUIRREL CREEK ROAD
GRASS VALLEY, CA
95945

INDIVIDUAL LETTER 719: SHAR MCLEOD

Response to Comment Ind 719-1

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decisionmakers for their consideration.

Regarding quality of life concerns, which are outside the scope of CEQA, please see Master Response 1. Regarding the generally noted air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding energy usage, please see Chapter 4.3; regarding climate change, please see Chapter 4.3 and Master Response 16 – Drought and Climate Change; regarding groundwater concerns, please Master Response 14 – Adequacy of Groundwater Model and Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding dumping mine waste, please see Master Response 8 – Mine Waste Characterization; and regarding noise, please see Chapter 4.10, Noise and Vibration.

Individual Letter 720

From: sharondelgado@earth-justice.org
To: bdofsupervisors
Subject: DEIR comments on Mine
Date: Thursday, March 24, 2022 3:00:05 AM
Attachments: Sharon"s DEIR statement march 2022.docx

Dist 1

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Attached please see the comments on the DEIR for the Idaho-Maryland Mine.

Thank you.

Sincerely,

Sharon Delgado

March 24, 2022
The Reverend Sharon Delgado
11328 Red Dog Road
Nevada City, CA 95959

Dear Nevada County Supervisors:

As we residents of Nevada County experience climate change for ourselves and struggle to adapt to extreme drought, heat waves, water shortages, periodic power outages and threat of forest fires, we also must contend with Rise Gold's attempts to persuade the public and local officials that reopening the Idaho-Maryland Mine would do us good. Yet regardless of its flawed and deceptive public outreach and its completely inadequate DEIR, the mine would negatively affect the community in many ways, including in our ability to adapt to and mitigate the impacts of climate change.

Ind 720-1

In June, our region got a taste of a record-shattering heat wave that farther north led to many deaths. We are in a historic "severe to exceptional drought," resulting in depleted reservoirs and mandatory water restrictions. Fire insurance rates are skyrocketing and policies are being canceled as fire season extends to almost year-round and as wildfires become ever more ferocious, burning more acres. Even as we pack our go-bags and create fire safe spaces around our homes, we know that catastrophic forest fires could come at any time.

Reopening the mine would only make these climate-related impacts worse.

Nevada County has had the foresight to respond proactively by adopting the Nevada County Energy Action Plan, which was developed by the Sierra Business Council with support from PG&E in collaboration with Nevada County and community members. The energy use of the mine would eliminate and more than cancel out gains attained through the Nevada County Energy Action Plan.

The plan, based on scientific climate forecasts in the context of our region, states: "From record temperatures to proliferating wildfires and changing precipitation patterns, climate change poses an immediate and escalating threat to the region's environment, economic strength and public health."

Ind 720-2

The plan is intended to "guide local government decisions that will help achieve greater efficiency, reduce costs and demonstrate the county's commitment to energy independence and community resilience," and to "inspire residents, businesses and other public agencies in Nevada County to participate in community efforts and maximize energy efficiency, renewable energy, and water efficiency."

This plan should guide analysis and decision-making about the mine as it relates to climate. It points to goals, strategies and ways to implement policies that will enable us as a community to adapt to projected climatic changes and mitigate harm by lowering greenhouse gas emissions. But reopening the mine would take us in the opposite direction.

Adapting to climate change means developing resiliency so that we human beings, our fellow creatures and coming generations can survive and thrive as much as possible.

This means carefully preserving our region's air, land, and water. The mine would further pollute our air, replace life-sustaining ecosystems with mine waste, and perhaps deplete our precious groundwater, putting wells at risk and sending millions of gallons of treated wastewater daily down Wolf Creek.

Ind 720-3

Adaptation means generating sustainable forms of livelihood, housing, education, business, agriculture, and more — locally-based as much as possible — and moving away from fossil fuels to justly sourced renewable power. Many community members, local businesses and local nonprofits are working to attain just such a vision. Rise Gold's project as described in the DEIR does not align with these goals.

Ind 720-4

Because it is a global problem, we must also do our part to mitigate the harm of climate change by reducing our regional carbon footprint. The Nevada County Energy Action Plan calls for gradually reducing annual residential electric use by 12 percent. Rise Gold's projected electrical use would cancel out this goal by annually using electricity equivalent to 5,000 new homes and could strain our already overburdened power grid.

Ind 720-5

Even more significant would be the massive carbon emissions caused by diesel-powered heavy equipment used for: constant construction during the first year and half; ongoing continuous excavating, underground blasting, drilling, rock crushing, loading, hauling, unloading, spreading, and compacting to create engineered fill up to seven stories tall; continuous mine dewatering by pumping, treating and sending millions of gallons of wastewater down Wolf Creek; increased new diesel truck traffic (up to 100 round trips a day, seven days a week, 16 hours a day). This would result in significant increases of greenhouse emissions rather than decreases as outlined in the county's Energy Action Plan.

Ind 720-6

What makes sense for Nevada County in light of these impacts on the climate system? In the words of the California Air Resources Board 2017 Climate Change Scoping Plan: "Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development." Given this goal and the tremendous impact on local emissions, the EIR must establish a net zero threshold for new GHG emissions from the project and declare that it has significant and unavoidable impacts.

The county has taken a proactive approach with its plan to foster resiliency and mitigate the harmful effects of climate change. Let's not turn back now.

Sharon Delgado

INDIVIDUAL LETTER 720: SHARON DELGADO

Response to Comment Ind 720-1

The commenter states the DEIR is inadequate. Responses to specific comments are provided below. The commenter states that approval of the project would exacerbate climate change. As stated on page 4.3-92 of the DEIR, with implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 720-2

The commenter states that the project's energy usage would interfere with the County's Energy Action Plan. The commenter also states that the project would exacerbate climate change. Although the County's Energy Action Plan is not a Qualified GHG Emissions Reduction Plan under CEQA, the DEIR nevertheless states that the project is consistent with the Energy Action Plan. (DEIR, p. 4.3-88.) The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding climate change, with the implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is less than cumulatively considerable. (DEIR, p. 4.3-92.) The commenter is also referred to Master Response 27 - Greenhouse Gas Thresholds and Master Response 25 - Nevada County Energy Action Plan. The commenter also states that the project would pollute our "air, land, and water" but provides no additional detail. Air emissions from the project are analyzed in Chapter 4.3 of the DEIR, biological impacts are analyzed in Chapter 4.4 of the DEIR, and groundwater impacts are analyzed in Chapter 4.8 of the DEIR.

Response to Comment Ind 720-3

The commenter states that many in the community are focused on moving towards energy produced by renewable sources and questions why solar energy was not proposed to mitigate energy consumption of the project, pointing to the Nevada County Energy Action Plan reduction goals. Compliance of the project with Energy Action Plan strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the Energy Action Plan. The commenter is also referred to Master Response 25 - Nevada County Energy Action Plan. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions over time. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis.

Response to Comment Ind 720-4

The commenter references the Energy Action Plan and states that the County should strive to reduce electric use and the project would eliminate progress towards that goal. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 720-5

The commenter states that a number of the project's components would increase GHG emissions and contribute to climate change. As stated on page 4.3-92 of the DEIR, with implementation of mitigation, the project's incremental contribution to global GHG emissions and climate change is



less than cumulatively considerable. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds and Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 720-6

The commenter states that a goal of any new development or project is to result in no net additional increase in GHG emissions. A net zero threshold is not required for the project. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Individual Letter 721

From: Thomas Seck
To: BOS Public Comment
Subject: Using history and common sense
Date: Wednesday, February 2, 2022 1:45:57 PM

Dist 1

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Ind 721-1

February 2, 2022

To our Board of Supervisors, I hope you all read our wonderful local newspaper The Union. The letter written in todays " other voices" section hit the nail right on the head. Mr. Tony Lauria stated the facts that all of us who lived here then and now remember about the not so glorious days when the mines were close to shutting down. I was 10 years old and walking to school at Hennessey and had to cross Wolfe creek where it flowed gray and scary. I felt if I ever fell in it would dissolve me. Please read Mr. Lauria's article and use your common sense.

Sharon Lynch Seck, R.N. (retired(

INDIVIDUAL LETTER 721: SHARON SECK

Response to Comment Ind 721-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1.

Individual Letter 722

Sharon C. Wagner
10165 Mills Road
Grass Valley, CA 95945
530-272-1082



March 21, 2022

Matt Kelley, Senior Planner
Nevada County Planning Dept.
950 Maidu Ave., Suite 170
Nevada City, CA 95959-7902

Re: Idaho-Maryland Mine Project

Dear Mr. Kelley,

I have lived in Grass Valley since 1973 when I was in my 20s. I moved here from Sacramento to enjoy the beauty of the area and the small town atmosphere. It was peaceful here. A wonderful place to raise children.

Ind 722-1 As I learned more about the history of the area, the realities of the mining industry made a deep impression on me. I could see the destruction wrought by the hydraulic mining that was eventually outlawed. I toured the Empire Mine site and was amazed at the extensive honeycomb of tunnels beneath the ground. I learned that the stamp mills ran day and night to process the ore removed from the mines. I couldn't imagine how anyone could endure that constant noise and pounding. I learned of the contamination of water and earth from heavy metals that were a byproduct of the mines. We are still dealing with cleaning up that contamination.

Ind 722-2 While the new mining project may have differences from past practices, it's still an industrial mining project. Its reality will involve blasting, loading truck after truck with the material being removed from the ground, and transporting that material over our local roads in truck after truck rumbling through our community. The mining company contends that the noise, dust, wear and tear on the roads, and inconvenience to residents won't be that bad. Sounds pretty bad to me.

Ind 722-3 They promise that they won't deplete or contaminate the aquifer that supplies water to people's wells, or that if they do, they'll do something to make up for it. Sounds iffy to me. The amount of water they will be using daily for their project is astounding, especially while we are suffering through historic drought conditions.

Ind 722-4 The picture they paint of how they will mitigate the impact to our community is too rosy for me to believe. The potential loss to the beauty and peace of our community is too great. The proposed benefit seems to be only for the mining company. The number of jobs they propose to create seems like a very small positive measured against a huge negative. The details of this project that I have read about in The Union seem like a nightmare scenario for my beloved Grass Valley.

We are not a mining community anymore. This mining project will not make people want to move to Grass Valley to work, raise a family, retire, or even vacation. It will make them ask how anyone could live in a place like that? And those of us who already live here will suffer the consequences brought on by this project. The mining company may downplay the negative impact, but I'm not buying it.

We are a community of art, theater, music, schools, families, retirees, technology and invention, clean industry, recreation, tourism.

Please don't send us back to the ugliness of our mining history. Let it remain in the past. Please reject this project.

Sincerely,

Sharon C Wagner

Sharon Wagner
10165 Mills Rd
Grass Valley, CA 95945
530-272-1082

INDIVIDUAL LETTER 722: SHARON WAGNER

Response to Comment Ind 722-1

The comment does not address the adequacy of the DEIR, but rather provides information on historical mining in the area and its effects. No response is required.

Response to Comment Ind 722-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Pursuant to Mitigation Measure 4.3-2 and the minimum requirements of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Response to Comment Ind 722-3

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change, as well as the analysis in Chapter 4.8, Hydrology and Water Quality.

Response to Comment Ind 722-4

The comment does not address the adequacy of the DEIR. Social and economic concerns expressed by the commenter are outside the scope of CEQA, but have been noted for the record and forwarded to decision-makers for their consideration. Please see Master Responses 1 and 2.

Individual Letter 723

From: Shayna Christie
To: bdofsupervisors
Subject: Opposition to the Idaho-Maryland mine
Date: Tuesday, February 15, 2022 4:42:30 PM

Dist 3

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Ind 723-1

I'm a district 3 resident and I would like to voice my opposition to the reopening of the Idaho-Maryland Mine.

Shayna Christie

INDIVIDUAL LETTER 723: SHAYNA CHRISTIE

Response to Comment Ind 723-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 724

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Sheerlie Rynglev

Address: 14343 Moon Shadow Dr, Nevada City, 95959

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 724-1

Like the vast majority of this community, I am vehemently opposed to this project. This community is still dealing with the mining history of these lands. We just tested our well (dug only in 2017) and it has TEN times the federal limit of ARSENIC. I spoke with a water remediation specialist and she said that is actually low for our area. She said she very frequently sees wells testing for THIRTY times the federal limit of arsenic. We are experiencing some of the worst droughts (every year) in history and we cannot risk one of our most precious resources for the continuation of LIFE with this unecessary, non-beneficial and reckless project. **Ind 724-2** As we all know, one of the most important aspects of our local economy is TOURISM. It provides more economic benefit to our economy in a single year than this project could accomplish in its entire duration. And WHY do people flock here to visit from near and far? **Ind 724-3** It's because of the pristine nature, the peace and quiet that is a hallmark of our community. All of that would be destroyed by this project. The pristine nature ~~is also~~ and quality of life is also why people even want to live here, despite wildfire risk. This project would rob of us of the reasons we live here and endure, PLUS would put us at even greater wildfire risk by disturbing the very precarious balance of our ecosystem. **Ind 724-4** WHY are we still talking about this?! We are all against it! Enough.

INDIVIDUAL LETTER 724: SHEERLIE RYNGLER

Response to Comment Ind 724-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. Regarding well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 724-2

Please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 724-3

Please see Master Responses 1 and 2 regarding quality of life and other social/economic concerns.

Response to Comment Ind 724-4

The comment does not address the adequacy of the DEIR, and has been noted for the record. In addition, please see Master Response 33 – Groundwater Dependent Vegetation.

Individual Letter 725

From: SHEILA LARUE
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Project
Date: Sunday, February 20, 2022 2:49:38 PM

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Ind 725-1

I am asking you to reject this very destructive project. it will severely damage our area, and I do so hope you refuse to allow this extremely damaging project to take place.

Thank you for your consideration,
Sheila J. LaRue, An Alta Sierra resident and voter

INDIVIDUAL LETTER 725: SHEILA LARUE

Response to Comment Ind 725-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 726

From: sheri_trailgearusa.com <sheri@trailgearusa.com>
Sent: Sunday, April 3, 2022 5:16 PM
To: Idaho MMEIR
Cc: Ed Scofield
Subject: I oppose the mine

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Dear Matt,

Ind 726-1 I oppose reopening the Idaho Maryland mine. It will use too much of our precious water resources, will release toxic compound into our water and hurt our property values. There is no benefit for the county.

Regards,

Sheri Fogarty

INDIVIDUAL LETTER 726: SHERI FOGARTY

Response to Comment Ind 726-1

Please see Master Response 2 regarding property values. Water resources and hazardous materials are discussed in chapters 4.7, Hazards and Hazardous Materials, and 4.8, Hydrology and Water Quality, of the DEIR. Please also see Master Response 35 – Discharge to South Fork Wolf Creek.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers.

Individual Letter 727

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@nevada.ca.us



February 23, 2022

Dear Nevada County Board of Supervisors:

Ind 727-1 I am OPPOSED the Idaho-Maryland Gold Mine being reopened by Rise Mining Company.

As a registered voter in Nevada County and a homeowner, I am deeply concerned about the proposed possibility of reopening the Idaho-Maryland Mine. I have downloaded and reviewed the EIR report.

Here are the reasons why I oppose reopening the Idaho-Maryland Mine:

Ind 727-2

MINE WASTE and WATER POLLUTION
Gold mining produces huge amounts of mining waste, some of which contain heavy metals and other toxic substances. Both waste rock and tailings threaten to pollute groundwater and surface water. Our community is still dealing with arsenic and the leaching of heavy metals from the Gold-Era days. And now, Rise, a Canadian company comes along and wants to produce even more mine waste for 80 more years: 182,500 tons per year! More tailings that polluting big rig diesel trucks will need to haul away with the potential for leaching more arsenic into our waterways for generations to come. I also find it interesting that the Canadian Company is choosing to open a mine in the US (California) instead of Canada. I know that Canadian

Ind 727-3

INCREASE GREENHOUSE GAS EMISSIONS
Diesel haul trucks, up to 100 round trips PER DAY will be needed to transport this mine waste, significantly increasing the amount of air pollution and greenhouse gas emissions into our community's air.

Ind 727-4

TRAFFIC AND SAFETY
The increase of vehicles, specifically 20-ton haul trucks, up to 100 round trips per day on the Cedar Ridge Y (Brunswick Road and Highway 174) intersection will be significant and unavoidable! This is according to the EIR report. Are the supervisors aware that the Union Hill Elementary School District, with over 800 students and staff, are within the boundaries of these dangerous roads and intersections? The same intersection and roads that school buses and parents use to transport students to school five days a week, twice a day. The same roadways that the EIR report states will have significant and unavoidable harm even after implementation of feasible measures. Reopening the Mine will threaten the safety of our children, their parents, and the over 100 school staff members from the nearby Union Hill School.

I am in attaching a copy of information I researched regarding the effects of mines on the environment, our communities and the world.

Is the pursuit of gold really worth so much environmental destruction AND the real potential for significant and unavoidable auto accidents between 20-ton trucks and children in cars/buses?
I think not. Please vote NO to Rise Mining Company.

Sincerely,

Sheri Hoss, 118 Margretta Ct. Grass Valley, CA 95945

BLOG ENTRY
5 February 2019, 1.26pm EST https://miningwatch.ca/blog/2019/2/5/behind-glitter-gold-facts

Behind the Glitter: The Gold Facts

THE GOLD FACTS

1. Gold mining has some of the largest human and environmental impacts of all types of metal mining.
2. More than 1 in 4 metal mines in the world (and in Canada) is a gold mine.
3. Top gold producing regions include China, Australia, Russia, USA, Canada, Latin America, South Africa.
4. In Canada, gold surpassed all other types of metals mined and exported in value over the last 10 years.
5. 50-60% of gold mined is for jewellery, 30-40% for banks & investments, 10% for industry and technology.
6. China, India, USA & Europe dominate the $350 billion jewelry market.
7. Some of the largest jewellery retailers in North America include Signet Jewelers, Tiffany, Walmart, Costco.
8. In North America and many parts of the world, mining is the largest source of contaminated solid waste into the environment.
9. Industrial-scale gold mining generates over 20 tons of contaminated wastes for each new gold ring made.
10. Industrial mining also uses large quantities of sodium cyanide – a substance very toxic to living organisms.
11. Artisanal small-scale gold mining is still the largest source of mercury pollution on earth, ahead of coal burning (!!!) – but there are mercury free alternatives.
12. As more accessible and higher-grade gold deposits are mined out, gold mining is expanding into more socially and ecologically sensitive areas, affecting local communities and Indigenous peoples' livelihoods.
13. About 40% of gold mining corporations are headquartered in Canada, 20% in Australia, 15% in the USA and Europe, and operate across the planet (eg: 45% of companies in Latin America are Canadian).

Ind 727-5

14. Increased mechanisation and automation mean that gold mining represents only about 15,000 direct jobs in Canada, but millions globally – mostly artisanal and small-scale miners.
15. While the mining sector accounts for about 20% of all Canadian exports, it represents only 3% of Canada's GDP – and gold mining a fraction of this.

Sources:

- *Commission for Environmental Cooperation (CEC) 2018, North American Pollutant Releases and Transfers, http://cec.org/tools-and-resources/taking-stock/taking-stock-online-north-american-industrial-pollution*
- *Common Objective 2018, The Size of the Global Jewellery Market, https://www.commonobjective.co/article/the-size-of-the-global-jewellery-market*
- *Environmental Protection Agency 2013, Mercury Emissions: The Global Context, https://www.epa.gov/international-cooperation/mercury-emissions-global-context*
- *IBEF 2019, Gems and Kewellery Industry Analysis, https://www.ibef.org/industry/gems-and-jewellery-presentation*
- *IBIS World 2019, Jewelry Stores Industry in the US, https://www.ibisworld.com/industry-trends/market-research-reports/retail-trade/clothing-accessories-stores/jewelry-stores.html*
- *Infomine Database 2019, http://www.infomine.com/, consulted on Feb.1st 2019*
    - *Over 36,000 mine sites in the database: 13,000 gold sites and 5,500 gold-copper sites; 6,100 active mine and mine complex sites (over 1,600 for gold), and about 2,300 in production (over 800 for gold). In Canada: over 300 active mine and mine complex sites (144 for gold, and about 55 in production).*
    - *Over 14,000 companies in the database, 3,640 in Canada (including about 3,000 globally for gold, 1200 listed as gold in Canada, 650 in Australia, 200 in the USA, 200 in Europe, 200 in Latin America, 200 in Asia, 150 in Africa, 90 in UK, 50 South Africa.*
- *Mining.com 2018, Top 10 largest gold companies in 2017, http://www.mining.com/worlds-top-10-largest-gold-mining-companies-2017/*

- *Mining of Association of Canada 2017, Mining Facts and Figures, http://mining.ca/sites/default/files/documents/Facts-and-Figures-2017.pdf.*
    - *Total of about 200 major active mine sites in 2016, including 17 active gold mines in Ontario (excluding polymetallic mines) and 24 total metal and diamond mines; 10 active gold mine sites in Quebec; 5 polymetallic gold mines in B.C.; 3 active gold/polymetallic mines in NFL; 2 polymetallic mines in MB; 2 in SK; 1 polymetallic mine in YK; 1 in NV; 1 polymetallic mine in NB.*
- *Mining Association of Ontario 2018, Mining Operations Map, https://www.oma.on.ca/en/ontariomining/map.asp*
- *National Pollutant Release Inventory 2017, Government of Canada, https://pollution-waste.canada.ca/national-release-inventory/archives/index.cfm?lang=En*
- *NRCAN 2018, Annual statistics for mineral production, http://sead.nrcan.gc.ca/prod-prod/ann-ann-eng.aspx*
- *NRCAN 2018, Gold Facts, https://www.nrcan.gc.ca/mining-materials/facts/gold/20514*
    - *Canadian mines produced an estimated 176 tonnes of gold in 2017, an 80% increase since 2008.*
    - *Gold is Canada's most valuable mined mineral, with a production value of $8.7 billion in 2017.*
    - *Ontario and Quebec together accounted for more than 70% of mined gold production in Canada, followed by British Columbia, Nunavut, Manitoba, Yukon, Saskatchewan.*
    - *The Bank of Canada no longer holds gold as part of its international reserves. This is the result of a Government of Canada decision to diversify its portfolio by selling its physical commodities and investing in financial assets that are easily tradable.*
- *NRCAN 2018, Minerals and the Economy, https://www.nrcan.gc.ca/mining-materials/facts/minerals-economy/20529*
- *Statista 2016, Largest jewelry markets worldwide in 2016, by country (in billion U.S. dollars), https://www.statista.com/statistics/718856/largest-jewelry-markets-by-country/*

- *Statista 2017, Top Jewelry retailers in the USA in 2017, https://www.statista.com/statistics/591814/sales-of-jewelry-retailers-in-the-us/*
- *Statista 2019, Luxury Jewelry worldwide, https://www.statista.com/outlook/21020200/100/luxury-jewelry/worldwide*
- *USGS 2018, Statistics and Information about Gold, https://minerals.usgs.gov/minerals/pubs/commodity/gold/*
- *World Gold Council 2019, https://www.gold.org/*
- *World Top Exports 2019, Canada's Top 10 Exports, http://www.worldstopexports.com/canadas-top-exports/*

INDIVIDUAL LETTER 727: SHERI HOSS

Response to Comment Ind 727-1
This comment is introductory in nature. The commenter's opposition to the project is noted for the decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 727-2
The commenter states that the project will produce mining waste that will pollute groundwater and mine water. The commenter is referred to Master Response 8 - Mine Waste Characterization and Master Response 35 - Discharge to South Fork Wolf Creek. The commenter also states that the mining waste will need to be hauled by polluting diesel trucks. Chapter 4.3 of the DEIR analyzes air quality, including associated with haul trucks, and found the project's impacts to be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.)

Response to Comment Ind 727-3
The commenter states that diesel haul trucks needed for the transport of mine waste will significantly increase air pollution and GHG emissions. Chapter 4.3 of the DEIR analyzes air quality, including associated with haul trucks, and found the project's impacts to be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.)

Response to Comment Ind 727-4
The commenter mistakenly states that the trucks used for hauling engineered fill to the Centennial Industrial Site will impact the Brunswick Road/State Route 174 intersection. Truck traffic from the project would not use the Brunswick Road/State Route 174 intersection. The commenter is referred to Figure 3-13 of the DEIR. Traffic impacts are analyzed in Chapter 4.12 of the DEIR.

Response to Comment Ind 727-5
The commenter refers to a blog post which discusses the gold industry in general. This comment does not pertain to the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Individual Letter 728

From: Sheryl Luxon <sherylllux@gmail.com>
Sent: Monday, April 4, 2022 10:31 AM
To: Idaho MMEIR
Subject: Rise Gold Mine

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SLEEP

Ind 728-1

Studies have proven, without a doubt, that sleep is as necessary to optimal health as is pure food and water. Poor sleep, or lack of sleep, detrimentally affects a persons health. It also adversely affects cognition, heart rhythms and the immune system.

As a Grass Valley resident, and a native California retiree, I live on a busy road that has school buses, garbage trucks, semi's and regular traffic. It is not my first choice to live here, but I am lucky to live here as my retirement income does not allow for market rate rent. I live in a senior community, tax deferred, and my rent is somewhat controlled and reasonable. It is not an option to move.

Studies have also proven that noise, exhaust and dust particles contribute to Dementia and Alzheimers. I am 30' from the road. Lucky for me, the traffic quiets down after 9 p.m. and starts again at 6 a.m.. The weekends actually are quiet enough, at times, to hear the birds and resident Red tail Hawk that reside in the forest of East Bennett Street.

Which brings me to the plans of Rise Gold to run their dump trucks 24/7 on various residential roads, and Hwy. 49, which disects our city of Grass Valley where hundreds of residents will be captive to the noise, exhaust and dust particles spewed from Rise Gold's dump trucks.

Lastly, the study that proves our brains need silence to regenerate, as the brain is still active during sleep, leaves no doubt that the health impacts of Rise Gold's plans to run dump trucks 24/7 will be detrimental to hundreds of Grass Valley, and surrounding areas, physical and mental health.

Therefore, the conclusion to Rise Gold reopening the mine is a resounding NO MINE!

Sincerely,

Sheryl Luxon
sherylllux@gmail.com
115 Union Jack St. #3
Grass Valley, CA 95945

INDIVIDUAL LETTER 728: SHERYL LUXON

Response to Comment Ind 728-1

The commenter states that the noise impacts from truck traffic will interrupt the sleep schedule of the nearby residents. The commenter also states that exhaust and dust particles contribute to dementia and Alzheimer's disease. Regarding the sleep disturbances, the commenter is referred to Response to Comment Grp 21-130. Regarding the project's impacts to air quality, the DEIR found that all impacts will be less than significant after mitigation. (DEIR, Impacts 4.3-1 and -2.) The commenter's general opposition to the project is noted for the decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 729



Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA, 95959

January 18, 2022

Dear Commissioners:
Danny Milman, Laura Duncan, Robert Ingram, Mike Mastrodonato and William Greeno,

I, the undersigned resident of Grass Valley, am opposed to the reopening of the Idaho-Maryland Mine by Rise Gold Corporation. I understand that you will be reviewing the Draft Environmental Impact Report and advising Nevada County's Board of Supervisors before they vote on the matter.

Ind 729-1

I have listened to both sides of the argument and find Rise Gold Mine to be inconsistent and misleading in their insensitivity to the environmental concerns we citizens have. Even though I have not gone over the EIR thoroughly yet, so far it seems they fail to adequately mitigate many significant negative impacts of this large industrial project on my family, friends, neighbors, and businesses:

Ind 729-2

- Air Quality – we already have a compromised air quality due to the pollution from the Sacramento Valley and fires. Any more and I will leave!
- Traffic – 100 large, heavy trucks moving rock etc. every day from the site down through the busy shopping area on Brunswick to Hwy 49 and all the way to Sacramento and beyond is inconceivable and intolerable for these reasons:

Ind 729-3

  - Traffic snarls potentially
  - Damage to road surfaces
  - Noise all along the route
  - Fossil fuel emissions adding to greenhouse gases
  -

Ind 729-4

- Water usage – more when we already have a shortage from drought is unacceptable.

Ind 729-5

- River pollution is possible from the water used in mining.

It is up to YOU as the Planning Commission to protect the citizens and keep this very special Foothills habitat beautiful and healthy. YOU are responsible for protecting our environment. Besides, there seems to be very little economic value from the project to local people.

Ind 729-6

I trust you will value my input and the comments from thousands of other residents, and see through the Rise Mine claims geared at profit to the truth of the hazards this mine might bring.

Sincerely,

Shirley Freriks 144 Sierra Blanca Ct, Grass Valley 95945…530-446-6446 sfreriks@mcn.org

Cc: Director of Planning Brian Foss, Senior Planner Matt Kelley, Principal Planner Tyler Barrington

INDIVIDUAL LETTER 729: SHIRLEY FRERIKS

Response to Comment Ind 729-1
The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Response to Comment Ind 729-2
For the generally noted air quality concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

Response to Comment Ind 729-3
Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Regarding damage to road surfaces, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

The analysis of greenhouse gas emissions in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, includes mobile sources. Please refer to Chapter 4.3 for the detailed evaluation.

Response to Comment Ind 729-4
Please see Master Response 16 – Drought and Climate Change, and Chapter 4.8, Hydrology and Water Quality, for additional information related to drought conditions and water usage, respectively.

Response to Comment Ind 729-5
Please see Master Response 35 – Discharge to South Fork Wolf Creek and Chapter 4.8, Hydrology and Water Quality, for additional information related to water pollution.

Response to Comment Ind 729-6
The comment does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to decision-makers for their consideration.

Individual Letter 730

From: Shirley Williams
To: bdofsupervisors
Subject: Fwd: Received the Draft Enviroment Impact Report
Date: Wednesday, March 23, 2022 8:27:35 PM

Dist 3

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Sent from my iPad

Begin forwarded message:

From: Shirley Williams <sjwilliams60@yahoo.com>
Date: March 23, 2022 at 6:44:52 PM PDT
Subject: Received the Draft Enviroment Impact Report

Received the Draft Enviroment Impact Report

Ind 730-1 About this report that came out. How is a normal,person supposed to understand this report. Of course not. but I have a nephew that works in the gold mine industry. He has worked all over the world in administration. I had him take a look. He can't understand why anyone would think it is a good idea to open a gold,mine in the middle of a small town. He read all the reports. He did say California has some of the strictest regulations. Did not believe California would allow this.

My first question is why we would agree to this site as light industrial to be changed for one person who once to open a gold mine that has been closed for 50 years in the middle of our town.

Ind 730-2 I am wondering why anyone would consider allowing this person to open anything here when they still have a court case pending in Canada. They left a lot of damage from their gold mine they were running until they were ordered to

close it down. What they did to the people there they filed bankruptcy and came here to raise a lot of problems. I also would like to know if their company is located in Nevada but they are here. If this is true why is their company not registered in California. Has to be a reason. I would like to know what it is.

Ind 730-3 I live about a block from this mine. I have lung cancer. I have spoke to my doctor about this problem. He said all the crap that this mine would put out will be very bad for me. The trucks throwing out all the diesel fumes would be bad for everyone but it could be deadly for me so I want this on record.

Ind 730-4 The constant noise from this mine would , I am sure, destroy my peace and quite that I am entitled to. I will not even be able to sit out on my deck which is the enjoyment I am entitled to.

Ind 730-5 I have to travel Brunswick every day for doctors, grocery stores, meds. Will I have to sit behind one of these diesel trucks breathing their crap when I need to go someplace.

Ind 730-6 They talk about these high paying jobs. What jobs. I have heard nothing about what jobs these are and what are they are being paid. For instance a Truck Driver - $15.00 hour. Working deep in a hole - $20.00 hour. I don't know what jobs they are talking about but I have seen nothing that says what the jobs are or what they would be paid. They should have to list these jobs as they keep saying these jobs will pay $100,000 a year. What Jobs.

Ind 730-7 This company has already violated rules in the beginning and the County did nothing.

Ind 730-8 What about our water. Does the powers that be not listen to the news. Our water situation is not very good. We are being ask to conserve water because we are in a drought that is the worst we have had many, many years. Now you want to allow this mine that no one wants to drain our wells, hook people up to NID who ask for conservation. What about all the wells that NID WILL NOT BE ABLE TO REACH when all these other wells go dry. Are you going to guarantee that these people will not lose their water.

Ind 730-9 How many on the board of supervisors will be living near this site. I don't think any of you will or would. There is so much that can be said about this project that is wrong but I will close with this. I read about "Rise Gold Valley which seeks to open the Mine has stated the project benefits far out weigh the impacts". Really someone thinks that having lung cancer and the crap that the mine would put into my lungs is just to bad for me. Really. thanks but no thanks.

Sincerely
Shirley Williams
14204 Tim Burr Lane
Grass Valley, California

Sent from my iPad

INDIVIDUAL LETTER 730: SHIRLEY WILLIAMS

Response to Comment Ind 730-1
The comment does not address the adequacy of the DEIR, but rather expresses opposition and general concerns related to the proposed project. Please see Master Response 1.

Response to Comment Ind 730-2
Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 730-3
The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR. Several commenters identified not being able to see the risk of the HRA visually. Isopleth figures were developed in response to these comments, which show where the project's emissions would travel. Please see Dudek Memo – Isopleths attached to the Final EIR as Appendix K.

Response to Comment Ind 730-4
Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Response to Comment Ind 730-5

Please see Response to Comment Ind 730-3.

Response to Comment Ind 730-6

The comment does not address the adequacy of the DEIR. Jobs and other social topics are outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 730-7

The comment does not address the adequacy of the DEIR and lacks specificity. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 730-8

Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

Response to Comment Ind 730-9

The comment does not address the adequacy of the DEIR. The comments concerns and opposition to the proposed project have been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 731

From: stacy beilman
To: Idaho MMEIR
Subject: Mine
Date: Sunday, February 20, 2022 7:10:30 PM

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Ind 731-1

In my opinion, we do not want this mine in Grass Valley. Bottom line, the negatives far outweigh the positives. I see no reason whatsoever to open up this mine.

Thank you
Stacy Beilman
Sent from my iPhone

INDIVIDUAL LETTER 731: STACY BEILMAN

Response to Comment Ind 731-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 732

From: stacy beilman <stacylbeilman@gmail.com>
Sent: Sunday, January 23, 2022 1:34 PM
To: Idaho MMEIR

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Ind 732-1 To Whom it May Concern, I am against the mine as I think the negatives outweigh the positives.
Thanks, Stacy Beilman, 10870 Newtown Road, Nevada City

INDIVIDUAL LETTER 732: STACY BEILMAN (2)

Response to Comment Ind 732-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 733

From: Stefanie Martinez <stefaniemartinez36@gmail.com>
Sent: Monday, April 4, 2022 2:43 PM
To: Idaho MMEIR
Subject: No Mine!!!

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902
(530) 265-1423

My name is Stefanie Martinez, and I am a resident of the Grandview Terrace neighborhood. I live at 10910 Drift Alley, Grass Valley and have been a homeowner here since 2011. I have grown up in the Grass Valley community since age 7, completing all of my schooling and college here, contributing to the local workforce, and deciding to purchase my home at the age of 25 further committing my ties to this community. I have always felt incredibly fortunate to call this place my home and have chosen to build my life here as I place a very high value on the natural beauty and peaceful quality of life that has been remarkably gifted to this area. Not only is Grass Valley considered a unique and beautiful paradise for its residents, it is also what continues to draw its tourists and visitors, which has a significant contribution to our local economy. Furthermore, I feel just as significant in importance is the local wildlife habitat and natural ecosystems in which we share our environment with.

Ind 733-1

I'm writing all of this with the point to establish my major concern with the reopening of the Idaho Maryland Mine by Rise Gold and its potential harmful impacts and toxic destructive inevitability in my hometown. It is a historically dangerous and hazardous operation and highly pollutant process. I understand that some of these concerns have been under evaluation and proposed to be mitigated within the DEIR. I strongly feel that the DEIR is incomplete and inadequate by far in order to sanction the extraordinary negative impact of this destructive business on this community. Please do not allow this to happen. I feel an extraordinary amount of helplessness as I understand this decision falls within the hands of a few. I live within a -too close for comfort- proximity to the mine site and I have enormous concerns for how this is going to affect me, my family, friends and neighbors health and quality of life. I think that it would be a huge mistake to allow for this operation to exist right within the proximity of so many residents. There are numerous concerns that I have with the many aspects of the potential impacts.

- Pollution of Water

Ind 733-2

Water IS gold. It is our most valuable resource. We need to preserve and protect it. What is essentially purposefully contaminated water being treated and released back into the environment simply spells out "bad idea". Room for accidents and error should not be ignored and dismissed. I am very uncomfortable with the track record of Ben Mossman's former mining business venture on Banks Island in Canada, where accidends did happen and contamination was found in the aftermath, left behind undealt with. I do not want to see this happen in my community, in our water streams. Wolf Creek is a life source to many ecosystems and animals throughout our county, parts of which run through properties where children play. Not to mention the numerous wells of which are located within the surrounding area supplying water for people and their properties. I do not want to see a repeat of the devastating and irreversible effects

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of the North San Juan Siskon Mine. Of course these types of occurrences are never intended, but this industry has proven time and time again that disaster lurks heavily, and with nearly impossible irreversibility.

Ind 733-3

-Air pollution
The proximity of which mine dust and toxic particulates will be disrupted and expelled into the atmosphere near my own residence is highly concerning and leaves me feeling anxious about what effect it could have on my health and everyone around me who will be living and breathing this air EVERY day of my life.

Ind 733-4

-Noise Pollution
I have concerns for the amount and level of noise that will be produced by the equipment and operation of the mine. As mentioned before, one of the highly desirable qualities of this area is its quiet, small town, peaceful environment. I am afraid that the intrusion of this industry will depreciate this value significantly.

These are just a few of my main concerns regarding the reopening of the Idaho Maryland mine. Please, please do not allow this in our community. The DEIR does not mitigate enough concerns of so many experts and of our community members. This dirty industry has no place in our future.

Thank you for your time,
Stefanie Martinez

INDIVIDUAL LETTER 733: STEFANIE MARTINEZ

Response to Comment Ind 733-1

The commenter expresses concern that the DEIR is incomplete, but does not provide specific examples that would allow for a detailed response. Quality of life concerns are outside the scope of CEQA – please see Master Response 1. The commenter's concerns are not for the record and have been forwarded to the decisionmakers for their consideration. Please also see the below responses to more specific comments.

Response to Comment Ind 733-2

Regarding water pollution concerns, please see Master Response 35 – Discharge to South Fork Wolf Creek; regarding well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; and regarding applicant concerns, please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 733-3

Please see Chapter 3, Air Quality, Greenhouse Gas Emissions, and Energy, for additional information related to air pollution. The DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant.

Response to Comment Ind 733-4

Please see Chapter 4.10, Noise and Vibration, for additional information related to noise impacts. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decision-makers.

Individual Letter 734

From: Stephanie Almanzar <steph.almanzar@gmail.com>
Sent: Monday, April 4, 2022 12:30 PM
To: Idaho MMEIR
Subject: Comment against the reopening of the Idaho-Maryland mine

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To whom it may concern,

My name is Stephanie Almanzar and I live in Grass Valley, CA District 1. I am writing to comment on the Rise Gold's application to reopen the Idaho-Maryland mine.

I moved to this area in 2020 because I wanted to be close to all the beautiful nature this area provides. As an entrepreneur working in the online space it was an easy yes to make the decision to move here with my partner from San Francisco.

One of the things that stood out to me was the community here. I could tell that the people that live here love this area deeply and show their care by keeping this area beautiful and clean. One place I noticed this was at the Yuba river. Noticing how locals clean up trash left by those who may not have the amount of reverence and respect for this area as the people who live here do. I have found this area deeply nourishing to my soul and would hate to see something so destructive as the mine start to decrease the quality of life in this precious area.

Ind 734-1

I believe that the county needs to take a look at the bigger picture surrounding the potential for reopening the mine. Looking at the impact it will not only have in the immediate future for the quality of life for those already living here but also the for the future generations to come. Quality of life is the most important thing for people to have the energy and resources to create and give back to the community. Reopening a mine owned by people who have no respect or reverence for the land here is not the answer to increase the quality of life for those of us who actually live in the area, those of us who love living here and respect this land as sacred.

Bringing in traffic, noise, and destruction would not only deter people from coming to visit and boost the economy it would drive those of us who love living here away. They say that this mine would boost the economy but I believe that instead it would deplete the lands natural resources and drive people away from this area. And so I urge you to do a legitimate and sound economic analysis in the DEIR before making any final decisions.

I also believe that it is important to look at Rise Gold as a company. Where do their interests lie? Do they actually care about those of us who live here and the impact this will have on us? Are they reputable? Have they successfully opened a mine and received profit? With only minimal research it is apparent that Rise Gold is all talk, shiny marketing, and empty promises. They are a 14 year old company and have never opened a mine or received profit. The CEO is known to have failed in their last venture. Leaving polluted tribal waters and rid themselves of responsibility, leaving Canadians with the price to pay for their failures. Is this really the type of company that will serve this community? I think not. I believe there is more in depth scrutiny necessary to make a sound decision on this issue. And I believe that if there is sound research done that who ever is reading this will find that opening this mine would be the biggest mistake this county can make for its people and this scared land we live on.

Ind 734-2

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Thank you for receiving me.

With sincerity and hope,

Stephanie Almanzar

INDIVIDUAL LETTER 734: STEPHANIE ALMANZAR

Response to Comment Ind 734-1

Quality of life and economic concerns are outside the scope of CEQA - please see Master Responses 1 and 2. Regarding the commenter's general traffic concerns, please see Chapter 4.12, Transportation of the DEIR. Regarding the general noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 733-4.

Response to Comment Ind 734-2

Please see Master Response 3 – Operator Responsibility.

Individual Letter 735

From: Stephanie Steyer <sjsteyer@icloud.com>
Sent: Wednesday, March 23, 2022 12:34 PM
To: Idaho MMEIR
Subject: NO to the reopening of the Mine!

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Dear Mr. Matt Kelley:

I am writing today as a concerned citizen of Nevada County. I am a home owner and I live in Rough and Ready. I've been in this area for 22 years. I am adamantly opposed to the reopening of the Idaho-Maryland mine. We don't need this in our community. Why do we want to destroy our water supply or the beauty of this place any more with mining?! The amount of jobs this reopened mine promises will NOT off-set the environmental damage.

Ind 735-1

It is simply **not** worth it to vote yes on reopening the mine. Please add my letter of opposition.

Thank you.

Sincerely,
Stephanie Steyer
13672 Quail Alley
Rough and Ready, CA 95975

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INDIVIDUAL LETTER 735: STEPHANIE STEYER

Response to Comment Ind 735-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project, which has been noted for the record. Please see Master Response 1. Regarding water supply concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Individual Letter 736

March 25, 2022

Stephen J. Baker
13975 Wings of Morning Drive
Nevada City, California 95959

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, California 95959-7902

Dear Mr. Kelley:

I am commenting on the risks on private domestic water wells created by the proposed Rise Gold mining project.

Ind 736-1

As a resident of Nevada County, I live on upper Banner Mountain and have used a groundwater well for 26 years. My background is unique to the issue of private domestic wells. I am a California Registered Geologist and Certified Hydrogeologist, have been doing hydrogeology for 42 years, completed a 10-year groundwater study in Nevada and Placer Counties that looked at domestic well vulnerabilities in fractured rock environments and submitted the draft environmental impact report (DEIR) comments on behalf of the Banner Mountain Home Owners Association when this mine was proposed to be reopened by Emperor Gold in 2009.

Based on what I have read in the draft environmental impact report (DEIR), I am concerned for our community. Dewatering the mine and its impacts on domestic wells are currently undefinable, unpredictable, the fundamental dataset is biased and monitoring data is not long enough in duration and too low a resolution to provide useful information.

First, I will explain what is wrong or missing from the DEIR and then I will explain what is needed.

Rise Gold relies on four datasets to generate an opinion on private domestic well vulnerability. The first dataset was generated by Emperor Gold. Emperor Gold's groundwater monitoring data ranged from 1995-2001 & 2003-2007. This well monitoring dataset is too sparse; 1) not long enough time period of monitoring (this is an 80-year project) and 2) data time intervals are once a month.

Ind 736-2

The second dataset consists of precipitation data and water levels in Rise Gold mine shafts. Rise Gold comments that water levels in mine shafts are unaffected by seasonality therefore wells are safe. They compared daily precipitation with fifteen water level readings in a sixteen-year period. This is the same issue as just mentioned. It is not possible to see trends because you miss the aquifer responses as a result of the low-resolution dataset. This dataset is also too short in duration. Conditions also change when going from steady state to transient. It is noted that our community has had more severe droughts since 2007 which may have created a more pronounced impact on groundwater this is not reflected in available data. We will likely be experiencing much more extreme droughts in the future.

Ind 736-3

The third dataset was generated from a computer numeric groundwater model. This is the wrong tool for answering the question of dewatering impacts in a fractured rock system. Numerical computer models are great tools that provide very useful projections in porous aquifers and other aspects of this project. But this area is a fractured rock aquifer and fractures are not mappable. Groundwater flow paths are not predictable with specificity. The model generalizes predictions on domestic well impacts. It's the details that matter. We need much more detail.

Lastly, Rise Gold is following a conclusion that the United States Geological Survey (USGS) made in 1984 regarding groundwater in fractured rock areas of California. USGS stated that well yields decrease with depth. The statistics that were quoted in the Rise Gold report were:

- 70% of the wells that are 215 feet in depth or less yield greater than five gpm and
- 75% of the wells that are deeper than 215 feet yield less than five gpm.

These datasets support Rise Gold's conclusion that mine dewatering is not going to impact wells. Wells are less productive as you drill deeper.

Ind 736-4

This conclusion is incorrect because the bias has not been recognized and adjusted in the data. Let me explain. The motivation of property owners is to drill until you find enough water for their property. Sometimes this is less than 215 feet of drilling and sometimes it is deeper. If you find water at a shallow depth, you stop drilling, even though deeper groundwater may also be available. Rise Gold's estimate of existing deep water are too low. Greater than 25% of the deep wells yield greater than five gpm and that doesn't include properties that have not drilled a well. Discrete flow pathways do exist at depth and can be quite robust to a well owner. There are more areas of deep groundwater than estimated by Rise Gold. The numbers are wrong.

OMISSION OF IMPORTANT DATA

The number of new wells has increased since the 1984 USGS report and the Emperor Gold hydrologic reports. Ask any local driller and County Staff. There is more reliance on wells today than ever before. Risk to losing groundwater supplies are also greater today because of the increase in drought intensity and length and population increases. The deepening of wells and new replacement wells have also increased during the last fifteen years. Again, ask local drillers and your County Staff.

My 10-year groundwater study in Nevada and Placer counties concluded that domestic wells are vulnerable to losing their supply however wells are uniquely different from one another. Specific well vulnerability characteristics are only recognized by monitoring the specific well.

Ind 736-5

The bottom line is data used by Rise Gold is outdated and biased. Domestic wells are already vulnerable and mine dewatering increases that vulnerability. A much stronger and more realistic analysis is needed.

Now I will explain what is needed. There are two main questions:

1. Does groundwater flow into the dewatered zones of the mine within an eighty-year period of time?
2. If so, what flow path is groundwater travelling to reach the mine workings, if at all?

The first question is answered by age dating the mine shaft water at several discrete depths. You may consider using sulfur hexafluoride (SF6) or chlorofluorocarbons (CFC). If groundwater takes less than 80 years to percolate to the mine workings under today's nonpumping conditions, then, the wells and mine are vulnerable to drought and dewatering of the mine. It becomes possible that mine dewatering would divert some of the groundwater away from domestic wells. We just don't know which wells and which groundwater flow paths are being used by domestic wells. I have age dated groundwater in the granites and metavolcanics found on the San Juan Ridge. Groundwater was estimated to be fourteen years to forty-six years old. I would expect similar age water at Rise Gold's mine.

Ind 736-6

In order to identify which well is impacted, we need to monitor specific wells at high resolution. This needs to start now. Background data is critical. Establishing background water behavior requires several years of monitoring. This is an essential monitoring criterium. Without adequate background data, evaluation of mine impacts on wells will become a hundred percent arbitrary decisions that is not relevant to the real problem. YOU NEED TO GENERATE ADEQUATE BASELINE DATA NOW.

Ind 736-7

I have only addressed water availability but I will say one thing about water quality. Dewatering is going to change groundwater flow paths and that can impact water quality. Different groundwater flow pathways sometimes encounter diff. rocks/chemical conditions. The system is dynamic. Groundwater monitoring must include both water level measurements and water quality analyses. Establishing background conditions is fundamental to building a strong and pragmatic well protection and contingency program.

CONTINGENCIES

Ultimately, contingencies will need to be comprehensive, well-funded and logistically sound. Don't waste money on the fifteen nested groundwater monitor well locations recommended in the DEIR. Focus on monitoring existing wells as your monitoring points.

Ind 736-8

Bringing NID into potential impacted neighborhoods early is the right thing to do, but, in many cases, you will not know who will be impacted until the last minute and that won't provide enough time to expand Nevada Irrigation District (NID) infrastructure into the entire impacted area. This is a problem. I am not sure how it can be answered.

My suggestion regarding the groundwater monitoring needs is to create a strategic, tiered groundwater monitoring plan to identify problems before they become critical. This is very different from the monitoring proposed by Rise Gold.

Construction of water pipes into each area that is predicted to have water impacts before the impact creates dysfunction. The zone of dewatering influence will not become known until dewatering occurs. The radius of influence will become more unpredictable because of seasonal precipitation changes and the expansion of mine working as related to unexpected encounters with secondary porosities of rock formations through time. Significant funding will be needed to anticipate responses to the expanding radius of domestic wells adversely impacted by mine dewatering. This will likely be costly.

Ind 736-9

Unfortunately, a couple conditions cannot be mitigated. **Rise Gold will handicap our community's ability to respond to future droughts.** Domestic well owner's response to drought is to deepen their wells or drill a new one. After Rise Gold dewaters the deeper well production zones, property owners will be drilling into a dewatered area. Eighty years is a long time to dewater an aquifer. This will impact our great grandkids.

As we stand now, our communities are not prepared to lose their groundwater supply especially if Rise Gold adds to the vulnerabilities of domestic well users.

Ind 736-10

The second handicap is the loss of the domestic well owner's water right to their groundwater resource. The dewatered mine water is public water that property owners can use. There is a caveat. The use must be reasonable and for use on their property. Mine dewatering will be occurring for eighty years, not five, and during that time, Rise Gold will remove water from properties other than their own. It is not reasonable or of value to domestic well owner properties. If water is transported to an unknown location down-gradient, the beneficial uses of that water need to somehow be returned to the domestic well owners. This large diversion of groundwater out of the subbasin will eventually be viewed as an overdraft of the subbasin. Aquifer characterization would be recognized as over drafted if the demand for water exceeds the volume of water that fills the aquifer each year.

If the overdraft in the subbasin is not corrected, the domestic well owner's very strong Overlying Groundwater Right could be lost by prescription. Imagine, water is there, the quality is perfect but the domestic well owner no longer has a right to use the groundwater.

This becomes possible because Rise Gold is pursuing 80 years for pumping, water rights in CA are going to change significantly (they already are) and predictions that drought will worsen and will create more

adversarial water conflicts in Nevada County communities. Officially recognized over drafted basins could develop. Prescription will become a reality in our communities if we are not careful. This is bad for the property owner and bad for the county.

Our wells are already vulnerable. We don't want to be handicapped. We need to be better prepared.

The monitoring and contingencies, as stated in the draft environmental impact report are not effective enough to safeguard our communities.

Respectfully submitted,



Stephen J. Baker
California Registered Geologist (No. 4354)
California Certified Hydrogeologist (No. 181)
530.205.6388

INDIVIDUAL LETTER 736: STEPHEN BAKER

Response to Comment Ind 736-1

The commenter asserts that the data used by the DEIR groundwater analysis is too sparse and does not cover a long enough period. The groundwater monitoring data referred to in this comment are plotted on hydrographs in Appendix B of the *Groundwater Hydrology and Analysis Report*, which is Appendix K.2 of the DEIR. For all but a few wells, the data show consistent cycles without any long-term increasing or decreasing trends throughout the almost 10-year period over which data were obtained, as discussed on DEIR page 4.8-12. It would not be reasonable to expect data collection over an 80-year period prior to this project. Review of Figure 3-4 of Appendix K.2 of the DEIR indicates that during this 10-year period, the annual water-year rainfall varied from 85.98 inches in 1995 to 30.73 inches in 2001. These values are within the 98th percentile and the 6th percentile, respectively, of the rainfall variation shown for the period from 1967 to 2018 on Figure 3-4 of Appendix K.2. Therefore, the monitoring occurred across a timeframe during which there were substantial variations in the rainfall amounts from year to year.

Monitoring of individual private wells at a greater frequency than that recorded for the monitoring from 1995 to 2001 and 2003 to 2007 may show short periods during which the water level was lower than the minimum recorded value in some wells, but that would be due to pumping of the well itself and not an indication of the actual water level within the fractured bedrock. More frequent monitoring in the past would not alter the understanding of the historic baseline of the groundwater elevations in the region.

Furthermore, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant. Additional data from existing private wells would not alter that conclusion or the need for mitigation. The groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-2

The commenter asserts that the data used in the DEIR when comparing precipitation data and water levels in the mine shafts is inadequate because of too short of duration and too few readings, to conclude that wells are "safe." This comment mischaracterizes the evaluation presented in the DEIR, which does not conclude that wells are "safe." As noted in the Response to Comment Ind 736-1, above, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant prior to mitigation. Additional data from existing private wells would not alter that conclusion or the need for mitigation.

It should also be noted that the water level data from the New Brunswick Shaft, as presented on Figure 4.8-5 of the DEIR, varies by less than seven feet, with the exception of one potentially anomalous result. Even considering that potentially anomalous result, the water level in the shaft varies by only 11 feet, in comparison with seasonal variations in the private domestic wells of 10 to 50 feet per year, even though measurements were made during a range of wet years and dry years.

As noted in Appendix K.2 of the DEIR, the water within the shaft and existing underground mine workings are not static. Water from the mine workings is constantly discharging to Wolf Creek. However, the rate at which the water discharges is limited by the rate at which the water can enter the workings through the fractures that have been encountered. The water level in the New

Brunswick shaft is 25 feet to 265 feet below the static water level in the wells in the East Bennett area, indicating that the water can flow out of the drains faster than it can enter the mine. The flow of water into the shafts and through the underground mine workings has also resulted in an existing drawdown cone around the shafts. These dynamic conditions provide an indication of the degree of interconnection between subsurface fractures and the mine workings, and the rate at which water can enter the mine, which is limited. As discussed above, the available data provides adequate resolution to understand the groundwater dynamics and to predict likely impacts based on dewatering. Further, the groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-3

The commenter asserts that the computer groundwater model is the wrong tool to analyze dewatering impacts in a fractured bedrock system. Please see Response to Comment Ind 232-1. Computer groundwater flow models that are based on the assumption of porous media are widespread in use in fractured bedrock analyses, and are appropriate in the context of the large area analyzed for the project. The upper alluvium and fractured shallow bedrock behave as a porous media on the scale that Itasca modeled for the project. An assumption of a porous media is appropriate given the scale and the objectives of the model. As discussed in the NRC (1996), a document referenced by Dr. Schneiderman in comment 232-1, and presented below:

> The level of detail required in the conceptual model depends on the purpose for which the model is being developed—for example, whether it will be used to predict fluid flow or solute transport. Experience suggests that, for average volumetric flow behavior, predictions can be made with a relatively coarse conceptual model provided data are available to calibrate the simulation model. Thus, a continuum approximation may be used to predict well yields with sufficient accuracy, even if a fracture network is poorly connected.

The continuum approximation mentioned in this paragraph is a porous media approximation. The application of a continuum (porous media) approximation is applicable to mining projects in that it is used generally to estimate flows from the mine and drawdowns in water levels due to dewatering, a situation similar to predicting well yields as discussed by the NRC (1996). The approach followed by Itasca is appropriate and is supported by the literature and common practice in the hydrogeology field.

Response to Comment Ind 736-4

The commenter asserts that the DEIR is wrong in concluding that there is less groundwater present at deeper depths below surface, and the DEIR is mistaken to rely on a USGS conclusion from 1984 on that issue. The DEIR does not rely solely on the 1984 USGS study (Page et al.) regarding well yields related to depth. Substantial evidence from California Department of Water Resources Well Completion Reports was also considered to evaluate how water production changes with depth from wells within the fractured bedrock. That additional evidence considered in the DEIR is illustrated on Figures 3-8, 3-9, and 3-10 in Appendix K.2 of the DEIR. The commenter is unclear on what depth range is implied when referring to "deep wells," however, as noted in Appendix K.2 (at page 33), below a depth of 450 feet, the maximum pumping rate was only four gallons per minute (gpm).

Response to Comment Ind 736-5

The commenter asserts that domestic wells are vulnerable to losing their water supply, and that the data used by the EIR is outdated and biased. As noted in the Response to Comment 1 of this

letter, the DEIR concludes, on page 4.8-66, that the potential impacts to groundwater supplies in private wells would be significant without mitigation. However, the DEIR concluded that the impact would be less than significant after implementation of mitigation. The groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was accurate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions.

Response to Comment Ind 736-6

The commenter states that the County should age-date the mine shaft water at several discrete depths to determine if water percolates into the mine in less than 80 years and should monitor specific wells at high resolution to generate baseline data before dewatering. Isotopic age dating of the water at various depths within the existing mine is described on page 65 of Appendix K.2 of the DEIR. The data indicate that the water at all depths sampled is less than five to 10 years old. This finding is consistent with the dynamic (i.e., not static) flow of water through the mine workings, as discussed in the Response to Comment Ind 736-2. Since the water under existing conditions takes only a few years to flow through the mine workings, and the existing water levels in the mine are below the static groundwater level in the surrounding fractured bedrock, then if there was a direct connection between the mine workings and any existing private well, it would already be reflected in the current observations.

The DEIR has concluded that additional monitoring is necessary as part of a mitigation program (Mitigation Measure 4.8-2(a)). Performance standards that identify when a well is impacted have also been identified in the DEIR (Mitigation Measure 4.8-2(b) on DEIR page 4.8-68).

The groundwater monitoring plan (Itasca 2021) provides a rationale for installing specifically designed groundwater monitoring wells versus using existing domestic wells.

The Itasca groundwater monitoring plan provides the following rationale:

> Assessment of impacts of water-level changes in domestic wells is difficult to perform when examining each domestic well on an individual basis because of operational and depth considerations for each well. In order to understand water-level fluctuations within the well, one must know how the well is completed and screened. The fluctuations of the water levels for each domestic well are controlled by the pumping rate, and it is not easy to obtain accurate pumping rates for a domestic well over time. Measuring well yields from domestic wells as an indicator of potential impacts from mining is not recommended because well yields or specific capacities of the well will not indicate impacts due to mining. Specific capacity is defined as the pumping rate (e.g., gallons per minute) divided by the drawdown, which is usually measured in feet. Specific capacities of wells can be influenced by many factors, such as mineral encrustation of the well screen, a malfunctioning pump, or biofouling of the well screen due to bacterial growth within the screen or well. These influences cannot be attributed to Rise's operations. The primary impact on a domestic well that may be attributed to the mining operations by Rise would be a decline of the water level in the well that is sufficient enough to reduce its use to provide an adequate water supply.

Nevertheless, in response to public comments, and as discussed in Master Response 15 – Adequacy of Groundwater Monitoring Wells, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master

Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Groundwater monitoring will be initiated at least 12 months before the commencement of dewatering. This will allow sufficient time to assess background conditions.

Response to Comment Ind 736-7

Monitoring of water quality from the mine, which would reveal if there were any changes due to encountering different rock types or geochemical conditions, as stated in the comment, is included as part of Mitigation Measure 4.8-1(a) on DEIR page 4.8-52. Additionally, monitoring of groundwater quality through the monitoring wells is also required by the groundwater monitoring plan.

Mitigation Measure 4.8-2(a) on page 4.8-68 of the DEIR is hereby amended to clarify that the groundwater monitoring plan includes monitoring requirements for water quality, as follows:

> *4.8-2(a)* *The Project Applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County. Implementation of the GMP shall be initiated prior to the dewatering of the mine and on an ongoing basis. Pursuant to the GMP, a network of monitoring wells shall be installed to the satisfaction of the Nevada County Environmental Health Department. Prior to construction of any monitoring wells within the County or City right-of-way, the applicant shall obtain an encroachment permit from the Public Works Department of the respective agency. Groundwater-level and groundwater quality information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department, and used to generate the following information:*
>
> *1) Water-level and groundwater quality monitoring data for a minimum of 12 months before commencement of dewatering of the mine.*
>
> *[…]*

The above change has been made in response to the comment for clarification purposes and does not alter the conclusions of the DEIR. It is also noted that the Domestic Well Monitoring Plan proposed by the applicant (see Master Response 15 – Adequacy of Groundwater Monitoring Wells) similarly requires evaluation of water quality data from domestic wells within the projected 1-foot drawdown contour.

Response to Comment Ind 736-8

The commenter asserts that the monitoring program should use existing wells rather than new monitoring wells. The commenter recommends "tiered" groundwater monitoring to identify problems before they become critical. Additionally, the commenter states that the radius of drawdown will not be known until dewatering occurs. Mitigation Measures 4.8-2(a), -2(b), and -2(c) address monitoring, performance standards, and corrective measures to address impacts to individual wells. While the commenter disagrees with the conclusions of the DEIR, the groundwater analysis and underlying data were reviewed by the County's water supply experts, who concurred that the analysis was adequate and that the impacts would be less than significant after implementation of mitigation. As such, the groundwater analysis constitutes substantial evidence to support the DEIR's conclusions. In addition, as previously noted, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the

predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 736-9

The commenter states that the mine will cause well owners to lose their water supply for 80 years and will handicap the community's ability to respond to future droughts. The existing baseline data evaluated in the DEIR do not provide substantial evidence that drought conditions (i.e., several successive years of below normal precipitation) have an appreciable effect on the groundwater elevation in the areas surrounding the project. With only a few exceptions, the monitored wells show consistent patterns and cycles that do not vary depending on the amount of rainfall. For the few wells that do not follow such patterns, the variations, or trends do not correlate with wet and dry periods. While drought conditions and the potential effects on groundwater supply are of concern throughout the state of California, the existing data do not indicate that drought conditions have had any substantial effect on the groundwater within the fractured bedrock in the project area. Please see Responses to Comments Ind 736-1 to Ind 736-8.

The proposed project would diversify water supplies available to the community and increase drought resiliency (see Master Response 16 - Drought and Climate Change). No groundwater level measurements have been completed since 2007 which creates some uncertainty to the predicted impact to percentage of water column in domestic wells. Uncertainty in predicted impacts is addressed through the various sensitivity scenarios discussed in Appendix K.3, the application of a 100% factor of safety (see page 4.8-58 of the DEIR), and the proposed connection of all 30 properties, including properties where no significant impact is predicted, in the E. Bennett area to NID potable water (see page 4.8-66 of the DEIR). Nevertheless, the analysis in Chapter 4.8 of DEIR has determined that the project could result in a significant impact to groundwater supplies without implementation of a groundwater monitoring program and well mitigation plan. Mitigation Measure 4.8-2(a) requires that a minimum of 12 months of water-level monitoring data is collected before commencement of dewatering. Impacts to domestic water wells will be measured against those current baseline measurements and not historic water levels. Mitigation Measure 4.8-2(b) requires well mitigation if, based the groundwater monitoring plan, a 10 percent reduction in the water column of a well is determined. Therefore, the determination of impact would be based on current water level data and any impacts to domestic wells would be mitigated through the proposed mitigation measures. In addition, as previously noted, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The focus of proposed mining is at depth greater than 500 feet below surface, and typically greater than 1,000 feet below surface (see Figure 5-1 of Appendix K.3), which is a much greater depth than an economically feasible water supply well due to the decrease in well yield with depth in a fractured bedrock system. The decrease in fractures and hydraulic conductivity with depth is well documented. As stated on page 4.8-8 of the DEIR, the U.S. Geological Survey (Page et al., 1984) conducted a study covering a 148-square mile area of southwestern Nevada County, including the segment of the Wolf Creek watershed from Grass Valley to the Bear River. The underlying bedrock consisted of similar rock types to those encountered at the project site, including hard, dense metavolcanic and igneous rocks of pre-Tertiary age. The study results found that the degree of fracturing in the bedrock, and thus the well yield, decreases with depth, with most of the available groundwater occurring above a depth of 215 feet below the ground surface (bgs). At depths shallower than 215 feet bgs, 70 percent of the wells evaluated produced more than five

gallons per minute (gpm). However, at depths deeper than 215 feet bgs, 75 percent of the wells produced five gpm or less. As stated on page 4.8-16 of the DEIR, EMKO reviewed 38 well completion reports within a 1- to 2-mile vicinity of the project site, which contained information regarding the total drawdown that occurred and the pumping rate achieved during initial testing of the wells immediately after they were drilled. A clear correlation exists between pumping rate and depth. The maximum pumping rate achieved was 125 gpm in a well with a total depth of 123 feet bgs. In contrast, at depths of 200 feet or deeper, the maximum reported pumping rate is 50 gpm. Below a depth of 300 feet, the maximum pumping rate reported was 10 gpm, and below a depth of 450 feet, the maximum pumping rate reported was only four gpm. Similarly, Todd Engineers (2007) developed a relationship between the hydraulic conductivity and depth based on information from approximately 300 driller reports. Todd Engineers (2007) found that the hydraulic conductivity of the fractured bedrock penetrated by the domestic supply wells in their study area varied significantly with depth, with greater values at shallower depths where more fractures are prevalent, and with much lower values at deeper depths, where fractures may be either less common or have smaller aperture (open) widths.

Response to Comment Ind 736-10

The California Department of Water Resources defines alluvial groundwater basins, and by extension, subbasins. There are currently no defined groundwater basins or subbasins in the project area within Nevada County. The commenter has not provided any data or other substantial evidence to support the statements or arguments in this comment for the County to evaluate further. Thus, the concerns raised are speculative and not related to a specific action or set of actions. The existing data does not provide an indication that would lead to a conclusion in the DEIR that the project would deplete or “overdraft” the groundwater throughout the region. The commenter’s argument that the dewatering of the mine could lead to the surface owner’s loss of a legal right to groundwater beneath their property is not supported by any legal citation and is speculative.

However, the DEIR does conclude that the project could have a significant impact on individual wells and provides mitigation measures that require monitoring, define performance standards, and prescribe corrective actions to address such impacts (see Mitigation Measures 4.8-2(a), -2(b), and -2(c) on pages 4.8-67 and -68).

Individual Letter 737

Dist 1

Ind 737-1

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Sterling Bailey

Address 14167 Loma Rica Dr. G.V. ZIP 95945

Phone

Email Address sterling.bailey@att.net

INDIVIDUAL LETTER 737: STERLING BAILEY

Response to Comment Ind 737-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 738

Gmail

Sterling Honea <sterlinghonea@gmail.com>

EIR gold mine

Sterling Honea <sterlinghonea@gmail.com> Wed, Feb 9, 2022 at 6:29 PM
Draft To: Idaho.MMEIR@co.nevada.ca.us

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BOARD OF SUPERVISORS

Dist 3

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
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Dear Mr. Kelley,

The following reflects my comments as a resident of the City of Grass Valley with respect to Draft EIR number SCH 20200 -70378, commonly referred to as the Idaho Maryland Mine project (hereafter project).

INTRODUCTION

Ind 738-1 The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

DEFICIENCIES IN EIR PROJECT REPORT

Ind 738-2 The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

Ind 738-3 There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

Ind 738-4 There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

Ind 738-5 One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

Ind 738-6 No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant

abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

Ind 738-7

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Ind 738-8

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Ind 738-9

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

Ind 738-10

Noticeably absent from analysis is the EIR assertion that there have only been three incidents of fatalities involved in underground mines in the past 25 years, one of which involved "CO poisoning." No discussion was made as to whether or not such mines were in close proximity to residential and commercial infrastructure such as this project. The fact that accidents do occur is even more compelling that a more comprehensive analysis of insurance must be included in a supplemental EIR report.

Ind 738-11

It is important to note that the project encompasses approximately 2,585 acres in the area. There's no indication if existing tunnels will be used or if new ones will be drilled, not to mention the discussion of explosion mitigation factors. There is no table or map that I can find that identifies the specific geographic location of the 73 miles of existing tunnels, or map of the 2,585 acres of mineral rights. (sec. 4.7) Nor is there a discussion of specific reclamation procedures and how long it would take to dewater these tunnels and the effect upon neighboring properties in terms of soil compaction and water quality.

Ind 738-12

One of the most significant deficiencies in this project report is the economic consequences to nearby businesses and residences. There is no analysis of property values possibly going down because of potential environmental effects, especially noise and traffic congestion. The only economic analysis done was that it would add 300 jobs to the tax base. An analysis and discussion needs to be done with regard to the economic consequences of property values that would counterbalance the positive contribution to the tax base. What type of buyer would want to be nearby? 118 round trips per day truck hauls by any standard, would contribute to traffic congestion, air pollution, and noise pollution that the report acknowledges is unavoidable and not capable of acceptable mitigation. Compounding an already unavoidable consequence of the project, is a lack of discussion as to how far these trucks will travel per day and what areas would be affected other than the ones nearby. No remediation of the noise was even addressed (except prohibiting trucks with Jake Brakes), such as the use of EV trucks that will become widely available in 2024.

Ind 738-13

CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea

cc

Clerk for the board of supervisors

City Attorney of Grass Valley

INDIVIDUAL LETTER 738: STERLING HONEA (1)

Response to Comment Ind 738-1
The commenter states that the DEIR, as a general matter, is inadequate. Responses to specific comments are provided below.

Response to Comment Ind 738-2
The commenter states that the Project Applicant has not demonstrated adequate financing for the project. However, this matter does not fall within the scope of CEQA review. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24; Appendix C.)

A mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other State and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 738-3
The commenter states that the DEIR omits any discussion of the price of gold needed to ensure the project is profitable. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 738-4
The commenter states that the DEIR does not discuss whether the Project Applicant has successfully implemented a similar project in the past. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 738-5
The commenter states that the DEIR omits any analysis and discussion of any insurance that would be required. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-6
The commenter states that the DEIR omits any analysis and discussion of any indemnification agreements that would be required by the County. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-7

The commenter states that the DEIR omits any discussion of any potentially available insurance policies for the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts, as well as Response to Comment Ind 738-2.

Response to Comment Ind 738-8

The commenter questions how the project will obtain insurance in the event that underground blasting causes damage to structures on the surface. Although the Project Applicant's insurance for the project is not a CEQA matter, all groundborne vibrations calculated for blasting of both drift round and longhole stopes, respectively, fall below the U.S. Bureau of Mines recommendations and the levels at which structural damage to buildings is possible. (DEIR, p. 4.10-54.) Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program to ensure the impact from blasting vibrations is less than significant.

As stated on page 4.6-47 of the DEIR, near-surface mine features require closure prior to initial mine dewatering to ensure that collapse does not occur. Mitigation Measure 4.6-3(c) requires the closure of these features prior to mine dewatering. The commenter is also referred to Master Response 29 - Near Surface Workings.

Response to Comment Ind 738-9

The commenter is concerned about what insurance would be available for residents that lose access to groundwater as a result of the project. The commenter is referred to Master Response 7 - Location of Future Mining Areas, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 738-10

The commenter states that a supplemental EIR is required because there have been three mining-related accidents involving explosives and breaking agents in the Country in the past 25 years, and the DEIR does not state whether these accidents occurred in residential or commercial areas. As demonstrated by the DEIR, mining-related accidents involving explosives or breaking agents are extremely rare. (DEIR, p. 4.7-28.) California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see *Napa Citizens for Honest Government v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342.)

Response to Comment Ind 738-11

The commenter states that certain project details are not discussed in the DEIR. Proposed underground mining is described on pages 3-18 and 3-19 of the DEIR. The dewatering, including an estimate of time to dewater the mine, is provided on page 3-15 of the DEIR and page 30 of Appendix K.2 of the DEIR. A map showing the mineral rights area is shown on Figure 3-2 of the DEIR. Maps showing the location of existing underground tunnels are provided in Appendix K.2 and K.3 of the DEIR. Impacts from the use of explosives are analyzed in Chapters 4.10 and 4.7 of the DEIR. The Reclamation Plan is provided as Appendix C of the DEIR. Impacts from mine dewatering, including impacts to water quality, are addressed in Chapter 4.8 of the DEIR. Mine dewatering would not affect "soil compaction" of neighboring properties and it is unclear what the commenter is referring to. The commenter is referred to Chapter 4.6 of the DEIR.

Response to Comment Ind 738-12

The commenter states that the DEIR lacks any discussion of economic impacts from the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts. The commenter also references a number of impacts

that could impact economic values in the area such as traffic and emissions. Traffic impacts are analyzed in Chapter 4.12 of the DEIR. Air quality, including emissions from trucks, is analyzed in Chapter 4.3 of the DEIR. Noise from trucks is less than significant after mitigation. The commenter is referred to Chapter 4.10 of the DEIR.

Response to Comment Ind 738-13

The commenter states that the DEIR is inadequate and opposes the project. The commenter's opposition to the project is noted for the decisionmakers.

Individual Letter 739

Gmail

Sterling Honea <sterlinghonea@gmail.com>

EIR gold mine

Sterling Honea <sterlinghonea@gmail.com>
Draft To: Idaho.MMEIR@co.nevada.ca.us

Wed, Feb 9, 2022 at 6:29 PM

FEB 10 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

Dear Mr. Kelley,

The following reflects my comments as a resident of the City of Grass Valley with respect to Draft EIR number SCH 20200 -70378, commonly referred to as the Idaho Maryland Mine project (hereafter project).

INTRODUCTION

The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

DEFICIENCIES IN EIR PROJECT REPORT

Ind 739-1

The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant

abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

Noticeably absent from analysis is the EIR assertion that there have only been three incidents of fatalities involved in underground mines in the past 25 years, one of which involved "CO poisoning." No discussion was made as to whether or not such mines were in close proximity to residential and commercial infrastructure such as this project. The fact that accidents do occur is even more compelling that a more comprehensive analysis of insurance must be included in a supplemental EIR report.

It is important to note that the project encompasses approximately 2,585 acres in the area. There's no indication if existing tunnels will be used or if new ones will be drilled, not to mention the discussion of explosion mitigation factors. There is no table or map that I can find that identifies the specific geographic location of the 73 miles of existing tunnels, or map of the 2,585 acres of mineral rights. (sec. 4.7) Nor is there a discussion of specific reclamation procedures and how long it would take to dewater these tunnels and the effect upon neighboring properties in terms of soil compaction and water quality.

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CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea

cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 739: STERLING HONEA (2)

Response to Comment Ind 739-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 740

From: Sterling Honea
To: Idaho MMEIR
Subject: EIR gold mine
Date: Thursday, February 10, 2022 8:54:28 AM

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

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INTRODUCTION

The purpose of a draft EIR is to alert the general public and elected officials to environmental changes before they reach an ecological point of no return. In essence, it is an "alarm bell" to demonstrate to apprehensive citizenry that the lead agency has in fact analyzed and considered all ecological implications of the report. If CEQA is scrupulously followed the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public will be duly informed and can respond accordingly to action to which it disagrees. According to the most cited California Supreme Court in this area held that: "The EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project."
(Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal. 3rd 376, 392, 405).

I believe the report does make an attempt to identify significant environmental effects, and some unavoidable significant environmental effects, but it has not adequately addressed a number of issues that should be identified separately in order for the project to proceed further.

Ind 740-1

DEFICIENCIES IN EIR PROJECT REPORT

The project readily admits that it will need financing for it to proceed to completion. However, there is no discussion whatsoever of how this financing will be obtained. Rise Gold Grass Valley appears to be a shell company with no significant financial assets for a project of this magnitude. The report does not indicate otherwise.

The report does not indicate the applicant has any financial backing for a project like this to proceed. There are no identified partners or other companies that will be forming any type of joint venture. Such a discussion and an analysis is extremely important in the event that the

project has to be shut down for economic or other reasons like it did in 1956, and the public is not left holding the bag and put in the federal Super Fund endless line for eventual remediation.

There's no discussion in the project report as to what the minimum price of gold would have to be for the mining project to remain profitable, if it was opened again. Without such critical information and the history of the applicant operating a project on the scale of this one, this would be critical information necessary for the public to know.

There is no discussion if the applicant has ever successfully operated a project like this adjacent to a residential and commercial community such as Grass Valley. The project in section 4.7 acknowledges that this undeveloped project is next to low density, residential developments and commercial uses.

One of the most critical omissions of the project report is an analysis and discussion of insurance that would be required, and if the applicant is able to even acquire such insurance for a high risk rock mining operation.

No discussion is offered concerning necessary indemnification agreements with the County of Nevada or City of Grass Valley which is in the affected area. There is possible massive environmental disruption this project could cause, including endless class action lawsuits against the county. If the county approved the project, who would be responsible for payment of all the attorney fees, court costs, and expert witnesses to defend the county's position? If the applicant abandoned the project for any reason, how is the county protected against necessary expenditures for all foreseeable consequences or remediation costs?

The project proposes a high risk operation which is covered by the strict liability legal standard. There is no analysis or discussion of what type of liability insurance the applicant could obtain. Accordingly, it would be difficult to even get an excess and surplus lines policy as there are few companies that would offer such a policy, such as Munich Re or Lloyd's Group. There is no discussion there is even a preliminary commitment by any adequately capitalized reinsurance company that would be willing to issue a policy that would cover the potential liability this report clearly shows is possible and foreseeable. Even if a policy could be obtained, the retention would be enormous, and as noted above, there is no financial information in the report that would indicate the applicant would qualify for the type of policy and reinsurance needed.

Another area that would require insurance would be the issue of earth movement. A standard homeowner's policy or commercial policy does not cover damage to property or structures as a result of earth movement. What happens if due to blasting operations, scheduled for twice daily, or dewatering, the buildings nearby suffer damage as a result of earth movement? Who is going to be responsible for obtaining the necessary earth movement endorsement insurance to give peace of mind to nearby residents in case there is damage? Or does the applicant propose to establish a claim bond fund for any claims that may arise whether or not it can be definitively proven if the applicant caused or partially caused earth movement that damaged nearby property?

Another example is that only a portion of the project proposes to give some nearby residents access to potable water. What type of insurance would be made available to other residents who may be adversely affected by their well operations either by contamination, volume, or

quality? Does Rise Gold propose to issue policies to protect such property owners by way of a loss payee endorsement? It is common knowledge that a first party claim or lawsuit has a much greater chance of being resolved in favor of the resident who has a legitimate loss or claim, than a third-party lawsuit in which the claimant must prove actual and proximate causation for any damages for recovery.

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CONCLUSION

The glaring and significant report omissions affecting the environment need to be addressed by ordering a supplemental report with public comment allowed thereafter within 45 days. If a request to intervene by the City of Grass Valley is filed, it should be permitted to participate as a necessary party due to their city residents being within the phase of influence for this project.

Respectfully submitted,

Sterling Honea
cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 740: STERLING HONEA (3)

Response to Comment Ind 740-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 741

From: Sterling Honea <sterlinghonea@gmail.com>
Sent: Wednesday, February 9, 2022 6:34 PM
To: Idaho MMEIR
Subject: EIR gold mine

CAUTION: This email originated from outside of County of Nevada email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Matt Kelley, Senior Planner
Nevada County Planning Department.
950 Maidu Avenue.
Nevada City, California 95959.
Idaho.MMEIR@co.nevada.ca.us

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Ind 741-1

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2

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Respectfully submitted,

Sterling Honea
cc
Clerk for the board of supervisors
City Attorney of Grass Valley

INDIVIDUAL LETTER 741: STERLING HONEA (4)

Response to Comment Ind 741-1

This letter is a duplicate copy of Individual Letter 738. Please see comments and responses in Individual Letter 738.

Individual Letter 742

Steve and Carolyn Battaini
14027 Liquidambar Ln.
Grass Valley, CA 95945

April 2, 2022



Board of Supervisors
County of Nevada County
950 Maidu Ave,
Nevada City, CA. 95959

Dear Sirs,

We oppose the Idaho Maryland Mine because it's a short-sighted, profit driven project with long-term consequences for this community, for local flora and fauna, the air, the water, and our quality of life. We also know well the harmful impacts of mining.

Water is the new gold. It's the lifeblood of every living creature. This project will pump it out of our county, into the watershed with the potential of heavy metal pollution to all downstream users.

Ind 742-1 We are living in a time of climate crisis and ecological emergencies. The idea itself is absurd, let alone the consequences it will have many generations into the future.

This unconscious greed for gold requires no regard to the unforgiving impacts it leaves in the wake of the destructive operations to get it out of the ground, literally, under our homes. In a nutshell, mining devastates communities, water and the environment, and should never be considered an option where people live nearby or downstream.

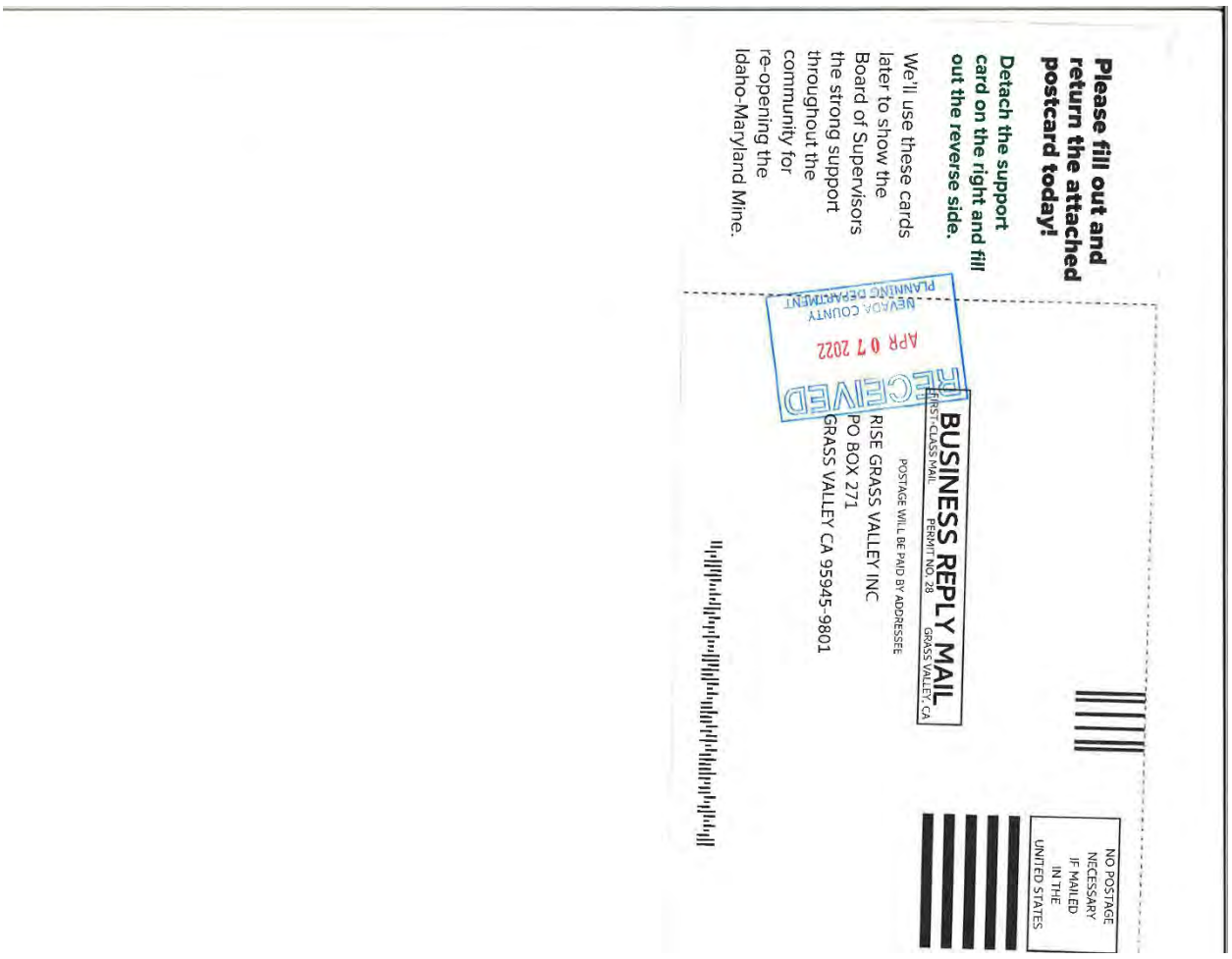
Please consider the horrible consequences of this ill advised project to the area, California, United States and the world.

Thank you for your consideration.

Sincerely,

Carolyn Battaini

Carolyn & Steve Battaini



Please fill out and return the attached postcard today!

Detach the support card on the right and fill out the reverse side.

We'll use these cards later to show the Board of Supervisors the strong support throughout the community for re-opening the Idaho-Maryland Mine.

NEVADA COUNTY
PLANNING DEPARTMENT
RECEIVED
APR 07 2022

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 28 GRASS VALLEY, CA

POSTAGE WILL BE PAID BY ADDRESSEE

RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

Ind 742-3

I support re-opening the Idaho-Maryland Mine.

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com and sign up.

INDIVIDUAL LETTER 742: STEVE AND CAROLYN BATTAINI

Response to Comment Ind 742-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding impacts to flora and fauna, please refer to Chapter 4.4, Biological Resources; regarding concerns regarding air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding water concerns, please see Chapter 4.8, Hydrology and Water Quality and Master Response 15 – Adequacy of Groundwater Monitoring Wells; and regarding climate concerns, please see Master Response 16 – Drought and Climate Change. Quality of life concerns are outside the scope of CEQA, as discussed in Master Response 1.

Individual Letter 743

From: Steve Farrage <sfarrage@gmail.com>
Sent: Monday, April 4, 2022 2:36 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: DEIR comments

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To the planning committee,

As a Nevada city resident I attended the open forum two weeks ago. The level of detail that was glossed over in the report is of great concern. There seems to be highly optimistic appraisals of how limited the pollution – air, water, noise etc. - will be with the mine reopening.

Ind 743-1 Our priorities should lie with reducing pollution and moving to a carbon neutral city. Allowing the mine to reopen is detrimental, damaging and dangerous for our community.

I urge the committee to reject any proposals to redevelop the
Idaho Maryland Mine.

Yours sincerely

Steve Farrage
211 Park Ave, Nevada City

Sent from my iPhone

INDIVIDUAL LETTER 743: STEVE FARRAGE

Response to Comment Ind 743-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. For additional information on impacts related to air, water, and noise, please refer to chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, 4.8, Hydrology and Water Quality, and 4.10, Noise and Vibration.

Individual Letter 744

From: steve hartshorn
To: Julie Patterson-Hunter
Subject: Re: Businesses OPPOSE Rise Golds proposal
Date: Wednesday, February 23, 2022 11:38:05 AM
Attachments: image001.png
Rise Gld BOS LTR.pdf

Dist 3

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Here you go.. Thank You

Steve Hartshorn
Recreation Realty
530-277-6630
The *"Real Estate Ranger"*
Nevada City California
steve@nevadacounty.property
www.nevadacounty.property
CABRE#01710568

From: Julie Patterson-Hunter <Julie.Patterson-Hunter@co.nevada.ca.us>
Sent: Wednesday, February 23, 2022 8:32 AM
To: steve hartshorn <steve@stevehartshorn.com>
Subject: RE: Businesses OPPOSE Rise Golds proposal

Steve – there is no attached letter.

Julie Patterson Hunter, CCB
Clerk of the Board

From: steve hartshorn <steve@stevehartshorn.com>
Sent: Tuesday, February 22, 2022 5:03 PM
To: bdofsupervisors <bdofsupervisors@co.nevada.ca.us>
Subject: Businesses OPPOSE Rise Golds proposal

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To All

Please confirm receipt and read the attached letter.

Thank You

Steve Hartshorn
Recreation Realty
530-277-6630
The *"Real Estate Ranger"*
Nevada City California
steve@nevadacounty.property
www.nevadacounty.property
CABRE#01710568

Nevada County Board of Supervisors
950 Maidu Avenue
Nevada City, CA 95959-8617
bdofsupervisors@co.nevada.ca.us

RE: Businesses OPPOSE Rise Gold's proposal to re-open the Idaho-Maryland Mine

Dear Supervisors:

The undersigned businesses respectfully request that you oppose Rise Gold's proposal to re-open the Idaho-Maryland Mine.

Ind 744-1 Mining is our past, not our future. During the past 50 years, Nevada County has worked diligently to attract people and investments that contribute to and renew its economic vitality through promising and sustainable enterprises which align with the aspirations of its residents. That is what continues to make this County an attractive place to live, to make a living, and to start new business ventures.

Ind 744-2 Reopening the mine risks a transformation from a community that is a scenic and cultural destination to an industrial town that tolerates excess noise, dust, and truck traffic. It would entail supporting a business that puts precious water resources at risk, generates significant greenhouse gases, and consumes so much energy that it would completely erase the county's plan to reduce the effects of climate change. The mine could become a deterrent for many seeking to build new business opportunities in Western Nevada County, resulting in reduced community investment and property values. We welcome the County's call for an independent economic study of the impacts of the proposed mine and expect that it will include a non-mine alternative.

Rise Gold's promises to inject money into the local economy may sound attractive, but Nevada County can do better by continuing to invest in existing industries as well as new enterprises that address current priorities in the Sierra like watershed and forest management. The Economic Policy Institute Brief cited by Rise Gold actually shows that other industries can produce far better job numbers than mining, including eight industries Nevada County already has today. An economic study commissioned by the City of Grass Valley during Emgold's attempt to reopen the Idaho-Maryland Mine in 2008 concluded that Nevada County would be better off economically if it pursued other opportunities than mining.

An industrial gold mine would not be a constructive addition to our community. The social and economic benefits are far from clear. The environmental impacts are sobering.

Ind 744-3 We urge you to protect our health, economy, and quality of life. Please deny Rise Gold's application to reopen the Idaho-Maryland Mine.

Thank you for your time and consideration.

Sincerely,

2/2/22

STEVEN HAMTSHORN
BUSINESS OWNER, REALTOR
"NEVADA COUNTY PROPERTY"

Cc: Alison Lehman, County Executive Officer, Nevada County
Grass Valley City Council members
Tim Kiser, City Manager, Grass Valley
Grass Valley Union

INDIVIDUAL LETTER 744: STEVE HARTSHORN

Response to Comment Ind 744-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Please see Master Response 1. Regarding the generally noted dust concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. In addition, pursuant to Mitigation Measure 4.3-2, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, as well as Response to Comment Ind 733-4; regarding truck traffic concerns, please see Chapter 4.12, Transportation; regarding concerns related to energy consumption, please see Chapter 4.3 and Master Response 25 – Nevada County Energy Action Plan; regarding greenhouse gases, please see Chapter 4.3 and Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits; and regarding water resources concerns, please see Chapter 4.8 and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 744-2

The comment does not address the adequacy of the DEIR. Economic impact considerations are outside the scope of CEQA - please see Master Response 2.

Response to Comment Ind 744-3

The comment does not address the adequacy of the DEIR. Please see Master Responses 1 and 2. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 745

OPPOSE

~~I support~~ re-opening the Idaho-Maryland Mine

Dist 1

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO MINE!

Name(s) STEVE MENDOZA, CLAUDIA GROVES

Address 10781 BANNER VIEW DR ZIP 95945

Phone 530 264 6414

Email Address

Ind
745-1

INDIVIDUAL LETTER 745: STEVE MENDOZA

Response to Comment Ind 745-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 746

From: Steve Nicola <roughnready7@gmail.com>
Sent: Wednesday, March 23, 2022 1:52 PM
To: Idaho MMEIR
Subject: Idaho-Maryland Mine Draft EIR

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Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Dear Mr. Kelley

I wish to offer my comments and recommendations on an aspect of the Idaho-Maryland mine project not covered in the Draft EIR. While the DEIR includes Chapter 4.8, Hydrology and Water Quality, the issue of water *quantity* is not addressed either here or elsewhere in the DEIR, as far as I could determine. The subject of water quantity is apropos to the discussion of groundwater in Chapter 4.8, beginning on Page 8 (and perhaps elsewhere as well).

The DEIR fails to adequately address the potential adverse affects of *climate change* on groundwater hydrology. Numerous analyses by federal and state agencies and academic institutions have documented the well established trend of increasing drought in California and the U. S. Southwest. Numerous reports from these sources are warning that our region may be entering a period of drought the likes of which have not been experienced in 1,200 years. Of course, with drought – as we have all witnessed – comes lack of precipitation, precipitation that is necessary to recharge groundwater tables.

Ind 746-1

The DEIR cites well water level monitoring data from the periods 1995 – 2001 and 2003 – 2007 (Page 4.8-11). It states that groundwater levels in the 79 wells from which they have records exhibit " . . . seasonal fluctuations . . . between wet and dry times of the year but remain relatively consistent from year to year within each individual well," citing above normal, normal, and below normal water years during the data periods (Page 4.8-12). The DEIR concludes that "**Based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge appears to be consistent from year to year and is not affected substantially by drought or wet cycles**" (Page 4.8.-12).

I submit that the limited number of years from which well water level data were obtained were not sufficient to describe the occurrence of climate "cycles." The "below normal rainfall" of 2007 actually was followed by two more drought years (2008 and 2009), and since 2009 we've experienced extended drought periods of five years (2012 – 2016) and now going on another five years (2018 – 2022). Or, to put it more starkly, with the exception of 2017, it can be considered that we are in, essentially, an 11 year "drought cycle."

I believe that the data presented in the DEIR are not adequate to conclude, as the project applicants have done, that groundwater recharge, as it may affect local wells, "is not affected *substantially* by drought" [my emphasis]. At the very

1

minimum the County should require the project applicants to update their well water "quantity" data to include the years since 2009. Further, I believe it is possible that the project sampling area may not be representative of groundwater quantity trends in the region, which may over time affect recharge in the project area. Therefore, I request that the County require the project applicants to include an examination of well water level and groundwater recharge trends over a wider area than that encompassed in the DEIR.

Thank you for your consideration of my comments and recommendations.

Sincerely,

Steve Nicola

267 Bourbon Hill Road

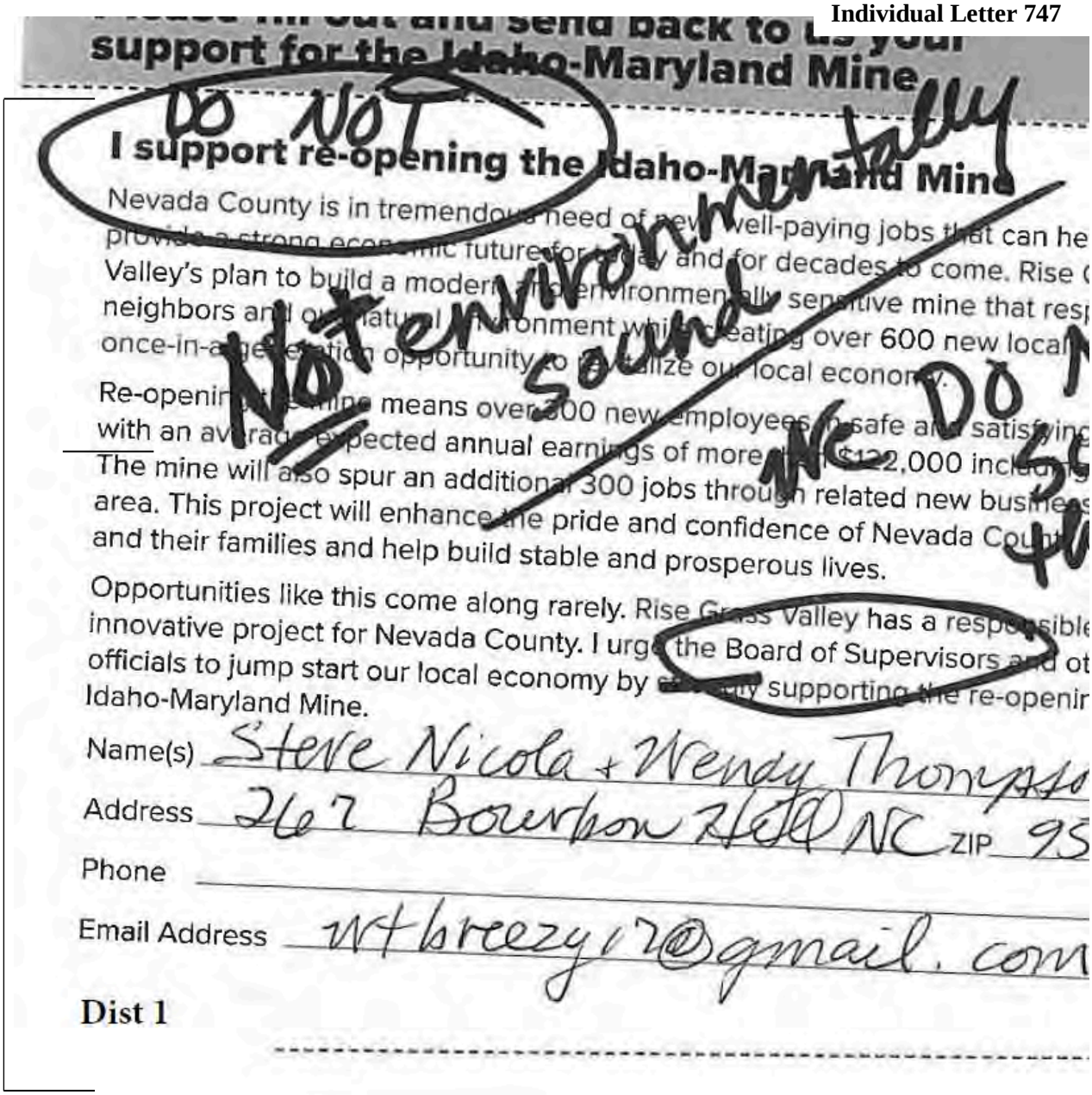
Nevada City, CA 95959

INDIVIDUAL LETTER 746: STEVE NICOLA

Response to Comment Ind 746-1

The commenter states that the DEIR fails to adequately address the potential adverse effects of climate change. The commenter specifically states that the DEIR fails to take into account groundwater levels due to the extended drought. The commenter is referred to Master Response 16 - Drought and Climate Change.

Individual Letter 747



support for the Idaho-Maryland Mine

DO NOT

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new well-paying jobs that can he
provide a strong economic future for today and for decades to come. Rise (
Valley's plan to build a modern and environmentally sensitive mine that resp
neighbors and our natural environment while creating over 600 new local
once-in-a-generation opportunity to revitalize our local economy.

Not environmentally sound

Re-opening the mine means over 300 new employees in safe and satisfying
with an average expected annual earnings of more than $122,000 including
The mine will also spur an additional 300 jobs through related new business
area. This project will enhance the pride and confidence of Nevada County
and their families and help build stable and prosperous lives.

Ind 747-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible
innovative project for Nevada County. I urge the Board of Supervisors and ot
officials to jump start our local economy by strongly supporting the re-openir
Idaho-Maryland Mine.

Name(s) Steve Nicola + Wendy Thompso

Address 262 Bourbon Hill NC ZIP 95

Phone

Email Address wtbreezy12@gmail.com

Dist 1

INDIVIDUAL LETTER 747: STEVE NICOLA AND WENDY THOMPSON

Response to Comment Ind 747-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 748

Stevee Duber
629 Spring Street
Nevada City, CA 95959

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

March 15, 2022

Re: Draft Environmental Impact Report (DEIR) on the Idaho-Maryland Mine Project

Dear Mr. Kelley,

Thank you for the opportunity to comment on the DEIR for the Idaho-Maryland Mine Project.

Ind 748-1

I am concerned that the DEIR does not use the proper baseline to analyze the impacts of the project on the environment. During the 80-year proposed permit period for the project, the Grass Valley/Nevada County region will experience increased flooding, increased wildfire, and increased temperatures, but the DEIR analyzes the projects impacts as if the project will be operating under existing conditions. The direct, indirect, and cumulative impacts of the project in a changed climate will differ from the impacts of the same project under existing conditions. For the DEIR to satisfy its obligations to inform, the DEIR must analyze the impacts of the project in the environment in which it will be operating. Specifically, but not limited to, the analysis of stormwater drainage and air quality are inadequate because the analysis is based on existing conditions rather than on the conditions which are expected during the next 80 years.

Stormwater Drainage

Ind 748-2

My main concern about the DEIR is its inadequate analysis of the stormwater drainage system. The drainage system is sized for a single, standalone 100-year/24-hour storm event. An event of smaller magnitude than what is predicted to occur. Expert scientists predict stormwater runoff during the 80-year life of the project will exceed the DEIR's 100-year/24-hour event based on climate change modeling for the Sierra Nevada. For instance, reports indicate floods comparable to the Great Flood of 1861-1862 are three times more likely to happen in the next 80 years.[1] During the 1861-1862 flood Nevada City

[1] Swain et al; Speaking about the probability of a deluge the size of the 1861-1862 storm event: "Our results suggest that such an event is more likely than not to occur at least once between 2018 and 2060, and that multiple occurrences are plausible by 2100 on a business-as-usual emissions trajectory. Therefore, recognizing that risks associated with hydroclimatic extremes may rise more rapidly than the gradual projected shift in regional mean precipitation might otherwise suggest will be a critical step in ensuring resilience amid a warming climate."

"Anthropogenic forcing is found to yield large twenty-first-century increases in the frequency of wet extremes, including a more than threefold increase in sub-seasonal events comparable to California's 'Great Flood of 1862'. Smaller but statistically robust increases in dry extremes are also apparent. As a consequence, a 25% to 100% increase in extreme dry-to-wet precipitation events is projected, despite only modest changes in mean

reported snowfall equivalent to 115 inches of rain. At Red Dog the 24-hour maximum rainfall during the 30-day storm was reported at 11 inches. [2] The "double whammy" effect of an Atmospheric River falling on accumulated snow dramatically increases surface runoff.[3]

The proposed drainage system is undersized. The maximum capacity of the proposed drainage system is calculated to contain a 100-year/24-hour storm event which will generate 9.64 inches of rain. (Preliminary Drainage Report p.7) The Preliminary Report does not consider what will happen if that 24-hour event occurs during a month-long event where flooding is exacerbated by warm rains that melt an existing snowpack as occurred during the Great Flood of 1861-1862 and which is predicted to occur again before 2060.

When the region next experiences a flood comparable to the 1861-1862 event, I am concerned that the drainage system proposed for the project will be overwhelmed and could cause a release of hazardous materials into the watershed.

I strongly encourage the County to reevaluate the proposed drainage system assuming storm conditions comparable to the Great Flood of 1861-1862 as the design storm event, not just on the basis of the maximum amount on a single day, but on the basis of a series of precipitation events that occur over a period of weeks; reevaluate how to mitigate the impacts of the project operating in an environment likely to see storm events such as the Great Flood of 1861-1862 and recirculate the DEIR.

Below are my detailed comments on the DEIR:

The DEIR does not use correct baseline conditions to analyze the impacts of storm water runoff

Ind 748-3

In section 1.3 the DEIR justifies using two environmental baselines to analyze the impacts of the proposed project. For evaluation purposes the DEIR proposes to use either existing conditions or post-remediation conditions depending on the resource topic being evaluated. For Aesthetics, Agriculture and Forestry Resource, Biological Resources, Hazards and Hazardous Materials and Wildfire, the DEIR uses an adjusted environmental baseline for the Centennial Industrial Site purported to reflect the "reasonably anticipated conditions of the site following remediation activities." For all other resource topics existing conditions are the environmental baseline.

The use of these two baselines is inadequate because they do not inform the public and decision makers about the environmental conditions *during* the 80-year life of the project. They only consider the initial conditions at the onset of the project and do not consider climate change and the expectation of

---

precipitation. Such hydrological cycle intensification would seriously challenge California's existing water storage, conveyance and flood control infrastructure."

Huang et al; "The disproportionately large increases in runoff during the most extreme [Atmospheric Rivers] could raise significant challenges for water resource management and flood control. Nearly all rivers draining [Sierra Nevada] watersheds are impounded by reservoirs. During future extreme AR events, the managed or even total storage capacity of those reservoirs could be exceeded by river water volumes that would be unprecedented."

[2] Null, Jan and Hulbert, Joelle (2007, January/February). California Washed Away The Great Flood of 1862. Weatherwise, p.29.
[3] Huang et.al p.7.

more severe storm events. During this period, experts predict the quantity of runoff due to storms will increase as documented in the attached reports. In fact, the DEIR also expects stream flows and flooding to increase during this period (DEIR p. 4.3-16) but does not quantitatively address the impacts. The increase in large pulses of runoff later in the century may cause increased hazards which should be analyzed in the DEIR.

The California Natural Resources Agency advises lead agencies to consider not just existing hazards, but the potential for increasing severity of hazards over time because due to climate change, increased flooding may worsen a proposed project's direct, indirect, or cumulative environmental impacts in the future.[4] According to the decision in *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th439:

> "Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline. "[N]othing in CEQA law precludes an agency... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal. 4th 439, 454.) "The key... is the EIR's role as an information document." (Id. at 453.)"

For the DEIR to serve its purpose as an information document, I urge the County to use a baseline that considers the storm and flood conditions that will occur during the entire 80-year permit period, update the DEIR accordingly and recirculate the DEIR.

Ind 748-4

Regarding Section 4.8-3: Substantially alter the existing drainage pattern...in a manner which would...create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

In the conclusion of Section 4.8-3 the DEIR claims that peer analysis by West Yost concurs with the drainage analysis by EMKO. However, the EMKO numerical model is only based on the 100-year/24-hour storm event and does not consider the impact of the larger storm events expected with climate change. West Yost concurs the analysis is adequate based on the assumptions made for the model but recommends a reassessment of those assumptions. Significantly, but not acknowledged in the DEIR, West Yost concludes its peer review report by stating, "Rise should evaluate whether the time frame evaluated in the numerical model adequately addresses the proposed 80-year duration of permitted activities."[5]

Please require the design storm event of the DEIR be updated to reflect the environmental conditions which will exist during the 80-year duration of the project; re-analyze the impacts of the project in the relevant environment and recirculate the DEIR.

[4] California Natural Resources Agency, "Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines" p.39

[5] West Yost Peer Review of Groundwater Hydrology and Water Quality Analysis and Groundwater Model Reports for the Idaho-Maryland Mine Project p.19

Regarding Mitigation Measure 4.8-3

Section 4.8-3 concludes the project's stormwater facilities design will avoid significant impacts associated with the potential to result in or contribute to runoff water exceeding storm drain system capacity. The impact, however, is nevertheless considered significant in the DEIR because The Preliminary Drainage Report does not meet the requirements for regulatory compliance to reduce the impact to less than significant. Specifically, the DEIR presents a confusing set of steps for assuring that drainage is adequate for the magnitude of storm drainage events. As a mitigation measure, the DEIR proposes generation of a Final Drainage Report which will "demonstrate that the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed pre-development levels in the downstream channel(s) during the design storm events."

Does this mean Rise will generate a Final Drainage Report which will simply confirm the conclusions of the Preliminary Drainage Report, or will the Final Drainage Report meet regulatory compliance requirements and independently propose the necessary parameters of the drainage system? If the Final Drainage Report is generated to simply confirm the conclusions of the Preliminary Drainage Report, I don't understand how that is a sincere effort to mitigate potential significant impacts.

Ind 748-5

The mitigation measure should ensure not only that storm flows post-development do not exceed the storm flows of pre-development levels; but also, that the project does not release pollutants into the watershed while dewatering the mine during storm events like those of the 1861-1862 Great Flood. If the Final Drainage Report proposes a drainage system with different parameters than the Preliminary Drainage Report, that system must be subject to environmental review. Allowing approval of the EIR before complete analysis is concluded deprives the public and decision makers from reviewing the potentially significant impacts of the whole project.

The mitigation measure does not set out clear performance standards as required by CEQA for what the future mitigation must achieve. Significantly, the mitigation measure proposes to use the "design storm event" as a basis for its calculations. The DEIR does not define "design storm event." Assuming it is the 100-year/24-hour event, as discussed above, it is inadequate.

Why defer this mitigation measure until after project approval? What is the design storm event? If the Final Drainage Report does not concur with the Preliminary Drainage Report what will be the result? Beyond generation of a report, it is unclear what enforceable measures mitigation measure 4.8-3 contains. A deferred report is not a sufficient mitigation measure.

I urge you to require the Final Drainage Report be prepared for environmental review as a part of the DEIR using the Great Flood of 1861-1862 as the design storm event; update the DEIR accordingly and then recirculate the DEIR.

Impacts of a Storm Event like the Great Flood of 1861-1862

Ind 748-6

Attached documents describe the large storm events California may experience during the 80-year life of the project. My main concern is how the project's proposed drainage system will perform during these events.

The stormwater drain system of the Idaho-Maryland Mine is tasked with managing and treating mine water discharge in addition to the volume of water that falls during storm events. The DEIR explains ground water must be continuously pumped out of the underground mine:

"•Ground water continually flows into the underground mine. If the water is not pumped out, the water would very quickly flood the lowest tunnels. Flooding would destroy electrical equipment that was left in place and cause increased work and material waste when the workings would be again dewatered.
• The ventilation system must be continuously on in order to provide airflow through the underground workings. Continuous operation of the ventilation system is necessary to provide a safe environment underground.
• The compressed air system for the underground mine is important for emergency situations where the ventilation system could fail or a fire occur underground and therefore must be kept operational.
• Electric locomotives need to remain functional at all times to move persons and equipment from working headings to the shafts.
• Underground lighting at certain key locations is necessary for safety.
• The hoists must be available for use to move personnel and equipment from the underground to surface. If the hoists did not function the workers would be trapped underground.
• The processing plant recirculates water and ground minerals through the processing systems. The slurry of water and ground minerals must be constantly agitated so that the solids do not settle. If the recirculation machines are turned off during operations, the sand would settle in all of the tanks and pipes which is very costly and time consuming to remediate.
• *The water treatment system must remain functional so that water can be treated and discharged." (emphasis added)* (DEIR page 4.3-103)

Given the urgency of keeping the tunnels dewatered, what size pumps does Rise propose to use? Will Rise size their pumps to manage a 100-year/24-hour event like the storm water drainage system? Or will Rise protect its investment with pumps capable of conveying the groundwater that might infiltrate the mine during the large storms predicted to occur in the next 80 years? Will the water treatment and stormwater drainage system be able to manage an 1861-1862 event? If not, will the project release pollutants into the watershed? If Rise uses pumps sized for a 100-year event which fail to dewater the mine during a larger storm event, will the water treatment system fail; will the mine become inoperable; will the project release pollutants into the watershed? If a large storm event overwhelms the drainage system, where will the water being pumped out of the mine go? What will be the impacts to downstream users and infrastructure, biological, agricultural, water quality and forestry resources? If electrical power is unavailable during a large storm event, will air quality be impacted by the use of gas pumps? The answers to these questions must be presented to the public and decision makers during environmental review.

Air Quality

Ind 748-7

The DEIR analyzes the impacts on air quality of the project as if existing conditions are constant over the next 80 years. We know this will not be the case. A recent study, "Increasing co-occurrence of

fine particulate matter and ground-level ozone extremes in the western United States" by Kalashnikov, et al, (attached) details the hazards to the environment and human health of the co-occurrence of fine particulate matter and ground-level ozone. It details the climatological and meteorological conditions which are causing increased chances of elevated concentrations of both air pollutants to occur simultaneously from July through September. The proposed project will contribute considerable amounts of these pollutants to the environment against the background described not the background assumed in the DEIR. The DEIR analysis does not consider how the project's discharges will add to the concentration of fine particles and ozone existing because of meteorological changes and wildfires that will occur in the next 80 years. The DEIR's conclusion that the project will not contribute to significant impacts or significant cumulative impacts to air quality, therefore, are suspect.

In an updated DEIR I strongly urge you to reevaluate the environmental impacts to air quality of the Idaho-Maryland Mine project taking into consideration the air quality the region will experience over the next 80 years due to the co-occurrence of high temperatures and wildfires as the baseline.

Conclusion

Ind 748-8

For the DEIR to serve its purpose to inform, I request you reevaluate the environmental impacts of the Idaho-Maryland Mine project using the conditions that will occur during the 80-year permit period as a baseline for analysis.

Thank you for your consideration,

Stevee Duber
Former Sierra County Planner and former CEO of the High Sierra Rural Alliance

Attachments:

Huang, X., Stevenson, S., & Hall, A. D. (2020). Future warming and intensification of precipitation extremes: A "double whammy" leading to increasing flood risk in California. Geophysical Research Letters, 47, e2020GL088679. https://doi.org/ 10.1029/2020GL088679

Daniel L. Swain , Baird Langenbrunner, J. David Neelin and Alex Hall (2018). Increasing precipitation volatility in twenty-first-century California. Nature Climate Change. https://doi.org/10.1038/s41558-018-0140-y

CALIFORNIA NATURAL RESOURCES AGENCY (2018). FINAL STATEMENT OF REASONS FOR REGULATORY ACTION AMENDMENTS TO THE STATE CEQA GUIDELINES OAL NOTICE FILE NO. Z-2018-0116-12.

Null, Jan and Hulbert, Joelle (2007, January/February). California Washed Away, The Great Flood of 1862. Weatherwise

Kalashnikov, Dmitri A.; Schnell, Jordan L.; Abatzoglou, John T; Swain, Daniel L.; Singh, Deepti; "Increasing co-occurrence of fine particulate matter and ground-level ozone extremes in the western United States" 5 Jan 2022 • Vol 8, Issue 1 • DOI: 10.1126/sciadv.abi938

INDIVIDUAL LETTER 748: STEVEE DUBER

Response to Comment Ind 748-1

The commenter asserts that the baseline used for the DEIR is incorrect because it does not account for climate change and changing conditions that will occur during the 80-year project operation. With regard to climate change, there is no consensus on how climate change will affect groundwater recharge and numerous other areas of concern, so analysis based on varying climate change predictions would be speculative. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As analysis of climate change scenarios, when there is no consensus on how climate change will affect the project site, would be speculation, this analysis is not required by CEQA. Further, the DEIR already analyzes varying climate conditions such as large storm events and multiple drought year scenarios, so the analysis already is responsive to the commenter's concerns. Finally, while the commenter states that use of existing conditions as the baseline is incorrect, CEQA Guidelines Section 15125 states that existing conditions "will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant."

Response to Comment Ind 748-2

The commenter asserts that the storm events analyzed by the DEIR in order to size the storm water basin and drainage infrastructure are too small, and the DEIR should instead look at the great flood of 1861-1862. As stated in Appendix K.5 of the DEIR, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm events. Furthermore, the California Surface Mining and Reclamation Act (SMARA) states that erosion control methods shall be designed for the 20-year, 1-hour storm and shall control erosion and sedimentation during operations as well as after reclamation is complete (see CCR Title 14, Section 3706). The 2-, 10-, 25-, and 100-year, 24-hour storm events were analyzed in this report, which more than satisfies the Nevada County requirements. Since the 100-year, 24-hour event is greater than the SMARA required 20-year, 1-hour event, the 100-year, 24-hour results will provide a greater factor of safety in the drainage design. Analysis of larger storm events would be speculation and is not required by CEQA. (CEQA Guidelines Sec. 15384.)

The engineered fill and mine water would not be classified as hazardous waste as discussed in the DEIR (see 22 CCR section 66261.3 for the definition of hazardous waste).

Response to Comment Ind 748-3

Please see Response to Comment Ind 748-1 with regard to the commenter's assertion that the baseline should include climate change effects. Regarding the different baselines used in the DEIR, the County uses an adjusted baseline for the Centennial Site in certain resource sections, because the Centennial Site will need to be cleaned up under a separate DTSC project prior to any project activity taking place on that site. If the DTSC clean up project is not completed, the project will not affect the Centennial Site. As such, analysis of the project's impacts based on existing conditions would be misleading to the public and decision makers for certain resource sections, as the project would only impact the Centennial Site after the DTSC cleanup project is implemented. Please see Chapter 1.3 of the DEIR for a full explanation of the different baseline approaches used for the project. As stated in the DEIR, "An agency may, where appropriate,

adjust its existing conditions baseline to account for a major change in environmental conditions that is expected to occur before project implementation." (DEIR, p. 1-4.) Further, CEQA Guidelines Section 15125(a)(1) states that, "…where necessary to provide the most accurate picture practically possible of the project's impacts, a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence."

Response to Comment Ind 748-4

The commenter cites a comment from the County's independent expert, West Yost, for the argument that the DEIR should analyze larger storm events. However, the quote from West Yost referred to by the commenter references the numerical model used for the prediction of groundwater drawdown and not the drainage analysis**.** As such, this comment from West Yost was taken out of context and does not relate to stormwater flow.

The drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. Please see Response to Comment Ind 748-2.

Response to Comment Ind 748-5

The Final Drainage Report will take into account the engineering details of the proposed drainage improvements which will be included in the application for grading and building permits. Therefore, the Final Drainage Report is a refinement of the Preliminary Drainage Report included in the DEIR. The approval of a Final Drainage Report is an administrative action not required to be analyzed under CEQA. The Preliminary Drainage Report is provided to allow the County to analyze the project's impacts, but a final engineered drainage report is not required to be included in an EIR under CEQA. California case law provides that engineering level detail is not required in an EIR. (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) The DEIR clearly defines the 100-year storm event as the requirement for Nevada County hydrology and hydraulics standards (see page 4.8-82 of the DEIR). The Final Drainage Report will meet the Nevada County hydrology and hydraulics standards, and as stated in Mitigation Measure 4.8-3, the project water discharge under post-development conditions must not exceed pre-development conditions; therefore, the mitigation measure provides clear performance standards and is not deferred mitigation.

Response to Comment Ind 748-6

The commenter speculates that a large storm could flood the mine causing the pumps to not keep up with the infiltrating water, resulting in water quality impacts and impacts to biology, agriculture, infrastructure and forestry. Likewise, the commenter asks whether there would be air quality impacts from gas pumps used to dewater the mine if there is a power outage during a storm event.

As an initial point, the commenter's claim that the mine could suddenly flood due to a storm event is not accurate, as the mine shafts are designed such that they would not be subject to flooding, and the infiltration of groundwater through bedrock into the underground mine works is an extremely slow process, not one that is impacted by heavy rainfall events. A 100-year storm would have limited effect on the underground mine because the openings to surface would be limited to the Brunswick and Service shafts, which would be graded to prevent surface run-off from entering the shafts. Further, there is no history of the mine ever being flooded by large storm events; rather, the mine only flooded when the pumps were turned off for long periods of time. As such, the commenter's statements are speculation and do not require analysis in the DEIR. (see CEQA Guidelines Section 15384.) Contrary to the commenter's statement, the storm water detention pond and associated facilities are not tasked with managing and treating mine water discharge. Mine water is placed in the water treatment pond and not in the storm water detention pond.



The pumps will be sized as necessary for dewatering and ongoing maintenance of water levels in the mine. The majority of other historic shafts connected to the mine are currently or proposed to be closed before mine watering, which limits water inflow from the surface into the underground mine workings.

The site drainage plan for the Brunswick Site routes the majority of precipitation run-off from the site to the storm water detention basin, as shown in Drawing H-4 of Appendix K.5. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from a 100-year storm event. An emergency overflow spillway prevents water from overflowing the water treatment pond berm and mitigates the risk of catastrophic overflow or failure of the pond walls caused by rapid erosion. The detention pond outlet structure also has an emergency overflow at the top of the open culvert to prevent the pond from overflowing (see page 12 of Appendix K.5). Any emergency spill during a storm larger than a 100-year storm would be primarily precipitation and therefore any release of pollutants (iron and manganese in mine water) would be heavily diluted and inconsequential in relation to the enormous water flows and runoff during such an event. The project includes backup power generators capable of powering the entire mine operation in the event of a power disruption. No gas pumps are proposed for the project.

Response to Comment Ind 748-7

The commenter asserts that the existing baseline conditions included in the DEIR should have considered meteorological changes and wildfires that may occur in the next 80 years. The State CEQA Guidelines Section 15125 provides the following guidance for establishing the baseline:

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

The baseline is not based on potential changes to the environment (such as meteorological changes and wildfires) that may or may not occur over the life of a project. These potential changes are speculative, and the CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). Please see Response to Comment Ind 748-1.

Response to Comment Ind 748-8

This comment summarizes the commenter's prior comments and questions. Please see Responses to Comments Ind 748-1 to Ind 748-7.

Individual Letter 749

From: Steven Millard <s.millard95945@gmail.com>
Sent: Saturday, April 2, 2022 6:04 PM
To: Idaho MMEIR
Subject: I. M. Mine Reopening issues

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Ind 749-1 Of course the water issues are at the top of the priority list, loss of well water & pollution are high on the agenda as well as air pollutants in the form of particulates like asbestos & silica dust floating in the air lodging in the lungs making people sick & die anywhere around the noisy mining operation.

Ind 749-2 I believe that the affect on traffic on Brunswick road is not properly addressed as traffic has grown on this road & moves up the hill at a good clip & they are claiming minimal impact when in fact trucks hauling mine rock will be turning on either Whispering pines with a growing business park & anticipated heavier traffic on a roadway that is already well worn & in need of replacement also there are times in winter months when Brunswick rd is impassable due to snow & ice & the chance of a runaway truck sliding out of control down Brunswick is frankly a horrifying thought.
The trucks will either be turning in front of on coming traffic at Whispering pines or Idaho Maryland which after Sutton is yet another well worn road already in need of replacement all of the way to the roundabout.
At the bottom of the Brunswick hill Idaho Maryland road is a winding narrow road running dangerously close to wolf creek before the stop at Sutton way with many semi trucks going in the opposite direction along with residential traffic commuters & hospital traffic adding to the likelihood that there will be collisions along that route.

Ind 749-3 I have recently seen a map showing the existing mine footprint & it comes within feet of my property along Burma road putting my well in jeopardy as well & along Rattlesnake road as far as highland blvd.
When I spoke with M-gold who sold the rights to Rise gold they told me that I was out of the area of where they would have to be concerned about well issues & I now know that was a lie & I don't like being lied to about matters of this magnitude so I am understandably skeptical to say the least & I am firmly in opposition to the reopening proposal!
It's just not a good fit for this retirement community.
Thank you. Steven Millard 13055 BlueJay Hill Road GrassValley ca 95945

Sent from my iPhone

INDIVIDUAL LETTER 749: STEVEN MILLARD

Response to Comment Ind 749-1

The commenter is concerned with impacts to private wells and air pollution but does not state specifically how the DEIR is inadequate. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Regarding air pollution, air emissions, including silica and asbestos, are analyzed in the DEIR and are less than significant after mitigation. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 21 - Conservatism of Silica Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions. The DEIR analyzes noise impacts in Chapter 4.10.

Response to Comment Ind 749-2

The commenter states that the DEIR is inadequate regarding traffic-related impacts on Brunswick Road. Traffic impacts, including cumulative impacts, have been analyzed in Chapter 4.12 of the DEIR. As stated on page 4.12-89 of the DEIR, TJKM's peer review also notes the presence of "ICY" signs on Brunswick Road, north of the Brunswick Industrial Site, also implies difficult traffic conditions during periods of inclement weather. Loaded trucks on the downhill section of Brunswick Road, approaching the Loma Rica Drive signals during poor weather, should be addressed. As mentioned above, this portion of Brunswick Road is already regularly used by heavy-duty haul trucks. An approximate length of just over 900 feet exists from the crest of the hill on Brunswick Road to its down grade intersection with Loma Rica Drive. As is currently the case, it is incumbent upon individual truck drivers to drive with caution during periods of inclement weather.

Response to Comment Ind 749-3

The commenter is concerned about impacts to the private well on the commenter's property. The commenter is referred to Master Response 13 - Historic Hydrogeologic Assessments, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter is opposed to the project and states it is not a good fit for the community. The commenter's opposition to the project is noted for decision makers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 750

RISE GRASS VALLEY
Rise Grass Valley
PO Box 271
Grass Valley CA 95945

P-3 P79 104**********ECRWSH**R010
Stuart Beach
13506 Barker Ln
Grass Valley, CA 95945-7930

PRSRT STD
U.S. Postage
PAID
TMG

Dist 3

THE IDAHO-MARYLAND MINE: A PROUD HISTORY

The Idaho-Maryland Mine was one of the most productive and best-known gold mines in the United States, producing approximately 2.4 million ounces between 1866 and 1956. The mine closed in 1956 as the fixed price of gold at $35 per oz made the mining of American gold unprofitable.

NO MINE

Rise Grass Valley will reinitiate mining and will do so with a focus on green-friendly practices and minimizing the impacts to neighbors. The project will use modern, clean, state-of-the-art mining equipment and proven techniques to produce "green gold." The result is a project that has no significant impacts to water, air quality, and the natural environment or from noise or vibrations during operations.

When in full operation, Rise Grass Valley's Idaho-Maryland Mine project will create hundreds of good-paying jobs and realize broad economic benefits for Nevada County.

Ind 750-1



Please fill out and send back to us your support for the Idaho-Maryland Mine

I support re-opening the Idaho-Maryland Mine

X OPPOSE

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Stuart Beach & Jill Shoemaker
Address 13506 Barker Lane ZIP 95945
Phone Grass Valley, CA
Email Address

Need more details on our plan to re-open the Idaho Maryland Mine? Want to join our team? Please visit RiseGrassValley.com/contact and sign up.

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 750: STUART BEACH AND JILL SHOEMAKER

Response to Comment Ind 750-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1.

Individual Letter 751

From: Summer Song Scanlan
To: Dan Miller; bdofsupervisors
Subject: Opposition to RISE mine
Date: Thursday, February 17, 2022 12:08:08 PM

Dist 3

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Hello,

Ind 751-1 Allowing the mine to reopen and rebuild is a terrible idea. The potential to disturb or pollute groundwater for such a large population of people is too high considering the continuing drought and unknown future impacts of climate change.

Ind 751-2 Traffic would be impacted, noise levels would be too high from constant trucks, and our roads would be torn up and filthy.

Ind 751-3 This company does not have a good record of managing the environmental impact of it's mining productions -- mining, in general, should no longer be allowed in an area that is as populated as Grass Valley due to the health and environmental impacts. It went bankrupt running a project much smaller in scope! I have no faith in their ability to manage this project in a way that is not detrimental to Nevada County.

Please do not allow this to move forward!

Summer Scanlan
379 Clark Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 751: SUMMER SCANLAN (1)

Response to Comment Ind 751-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 35 – Discharge to South Fork Wolf Creek and Master Response 16 - Drought and Climate Change.

Response to Comment Ind 751-2

Haul truck noise is addressed in Impact 4.10-2 of the DEIR. Regarding damage to roads, Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the project driveway and Brunswick Road.

Regarding traffic impacts, please see Chapter 4.12, Transportation, of the DEIR.

Response to Comment Ind 751-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 752

From: Summer Song Scanlan
To: Idaho MMEIR
Subject: Comment on Maryland Mine
Date: Monday, February 7, 2022 2:14:43 PM

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Ind 752-1

Hello,

I think allowing the mine to reopen and rebuild is a terrible idea. The potential to disturb or pollute groundwater for such a large population of people is too high considering the continuing drought and unknown future impacts of climate change.

Traffic would be impacted, noise levels would be too high from constant trucks, and our roads would be torn up and filthy.

This company does not have a good record of managing the environmental impact of it's mining productions -- mining, in general, should no longer be allowed in an area that is as populated as Grass Valley due to the health and environmental impacts.

Please do not allow this to move forward!

Summer Scanlan
379 Clark Street
Grass Valley, CA 95945

INDIVIDUAL LETTER 752: SUMMER SCANLAN (2)

Response to Comment Ind 752-1

This letter is a duplicate copy of Individual Letter 751. Please see comments and responses in Individual Letter 751.

Individual Letter 753

From: SUNNIE SKILES
To: bdofsupervisors
Subject: I support the re-opening of the Idaho-Maryland Mine
Date: Monday, March 21, 2022 1:03:12 PM

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Re: I support the re-opening of the Idaho-Maryland Mine

Dear Board of Supervisors County,

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once in a generation opportunity to revitalize our local economy.

Ind 753-1

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual salary of more than $90,000 plus benefits. The Mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Sincerely,
SUNNIE SKILES
sskiles@proyouth.net
727 Quail Haven Rd Colfax, CA 95713 Constituent
This contact information has been verified

INDIVIDUAL LETTER 753: SUNNIE SKILES

Response to Comment Ind 753-1

The comment does not address the adequacy of the DEIR, but rather expresses general support for the proposed project. Please see Master Response 1.

Individual Letter 754

From: Susan Brandt
To: Idaho MMEIR
Subject: Public Comment regarding Idaho-Maryland Mine Project (State Clearinghouse No. 2020070378)
Date: Saturday, March 12, 2022 11:33:23 AM

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To Matt Kelley, Senior Planner,

In The Union December 24, 2020, there was a full-page Christmas letter ad by Rise Grass Valley's Ben Mossman. He assures readers his goldmine won't have any ill effect on Grass Valley. He used old time photos of miners to conjure nostalgia for the old days. He invited readers to send him a letter, providing his email. So while, I am against the plan to re-start the old Idaho Maryland Mine, since he listed his email address and invited our letters, I decided to send Mr. Mossman an email.

My letter's focus was to suggest another way to develop that property, something other than a goldmine. The alternative idea would be more beneficial to the community. What if he took all the money he would use to re-start the goldmine and think of something that would be beneficial to the community? A marketplace, a park, a clean energy park, a staging location for CalFire, so many good options.

Ind 754-1

It's now two years since I was invited to write my email to Rise Grass Valley. Since then I've received two 11x14 glossy full-color promotional pamphlets mailed to my house touting the greatness of re-opening of the Idaho-Maryland Mine. His approach now is to show clean streams of water with a man washing his face in it, a young blond woman outfitted as a smiling miner - really? While he asked for my email two years ago, apparently, he didn't want to hear from me and didn't think it might offend me to send me these promotional materials.

As a resident of Grass Valley, I feel like I've been terrorized for two years, never knowing for sure if this mining might be accepted and start wreaking havoc in our beautiful town. Since I live nearby, I would be able to hear the rock grinding and explosions, I would have to drive with the mining truck traffic, my well water may be affected with the suction of water by Rise Grass Valley, my property value will decrease. Recently I had a rock hit and crack my windshield from a truck driving by my car on 174. More trucks on 174 would be disastrous for so many reasons.

What if he took all the money he would use on drills, trucks, explosives and gasoline and instead enhance the beauty of the area with — how about a Mossman Park? It could be a beautiful tribute to the old mine but with an Earth friendly park that teaches about local flora and fauna while honoring the area's mining history, how about a farmers market, a playground? Does Ben Mossman own this property? Will he ever change his mind? How do we get out of this mess?

Ben Mossman and Rise Grass Valley do not respond to the community, I can attest to that. Their PR company schemes to deceive us into thinking the community supports this. God forbid a problem arises with the gold mine — and any sort of issue could develop from explosions alone — we can't expect this company to care as much as we do about our land, to have any motivation to correct problems. This will be in our hands, and the hands of the supervisors to correct, for 80 years, what a mess this will be.

Please stop Rise Grass Valley from gold mining here. In fact, please stop all future gold mining proposals here, what a waste of time this has been for the community to deal with this possible destruction when we could be spending time doing positive things.

Sincerely,

Susan Brandt Blachley

13784 Crawford Lane


Grass Valley, CA 95945

INDIVIDUAL LETTER 754: SUSAN BRANDT

Response to Comment Ind 754-1

Regarding the commenter's suggestion of various alternatives, it is noted that the DEIR evaluates alternatives to the proposed project in Chapter 6. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Regarding operational noise concerns, please see Response to Comment Ind 733-4. Regarding well water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Property value concerns are outside the scope of CEQA – please see Master Responses 1 and 2.

SR 174 is not a proposed truck haul route for the project. Please see Response to Comment Ind 704-4.

Regarding the generally noted explosion concerns, please see Chapter 4.7, Hazards and Hazardous Materials.

The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 755

From: susan graf
To: Matt Kelley; Letters The Union
Subject: Ray Bryars article Feb.16
Date: Wednesday, February 16, 2022 8:21:55 AM

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Ind 755-1

Ray Bryars' article today sums up what we've all been concerned about the opening of the Idaho Maryland mine but have not investigated. I object to the mine reopening, but have the usual non-information about noise, traffic, etc. impacts. Mr Bryars has researched the histories of significant mine explosions around the world so he has real insight into one huge reason why we should deny this project.

Susan Graf
339 Clay St.
Nevada City,CA 95959
530-265-o941

INDIVIDUAL LETTER 755: SUSAN GRAF (1)

Response to Comment Ind 755-1

Please refer to Chapter 4.7, Hazards and Hazardous Materials, for additional information regarding the risks associated with the use of explosives, the impact from which was determined to be less than significant after mitigation. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 756

RE: Rise Gold Mine

March 15, 2020
339 Clay St.
Nevada City Ca 95959

Planning:

Ind 756-1

Rise Gold is supposedly doing everything right in the reopening of the Idaho Maryland mine.

They've checked all the boxes but that doesn't mean that their property is the best use of the land. Yes, they own it and it is zoned properly, but let's assume they've thought of another use for the mine site: perhaps a nuclear reactor or a military storage facility with bombs and artillery. Nuclear waste would certainly be a good place for a defunct mine. Rise Gold could still do all the mitigation and provide jobs, but where is the use permit? That's what an EIR is supposed to cover.

Please say no to this project.

Sincerely
Susan Graf

Susan Graf
Nevada City

RECEIVED
MAR 17 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ms. Susan F. Graf
339 Clay St.
Nevada City, CA 95959

INDIVIDUAL LETTER 756: SUSAN GRAF (2)

Response to Comment Ind 756-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 757

From: Susan Jaffe
To: Idaho.MMEIR@co.nevada.ca.us
Subject: comments about proposed mine
Date: Sunday, April 3, 2022 3:14:32 PM

Ind 757-1 I live less then a mile from the proposed Idaho Maryland mine. My husband and I and all our neighbors are totally against the opening of this mine. With all we have been throught these last 2 years, covid, threat of fires and smoke, adding mine worries is unthinkable. There is the issue of noise, traffic near our home will be constant. Air pollution, dust and truck hauling unacceptable with issues of climate change that threaten our area, as well as pollution coming up the hill from Sacramento. Possibility of losing our wells is devastating. Reduction of property values, which we are told is already happening because of threat. The area proposed is residential and totallly inappropriate for a mine and will affect wildlife and peace and tranquillity. I could go on and on. We hope the council listens and hears what so many of us feel so passionate about. No mine please. Not now or ever. Thank you for your attention. Susan Jaffe and George Marks, 13974 Glenn Pines Rd, Grass Valley, Ca 95945

INDIVIDUAL LETTER 757: SUSAN JAFFE

Response to Comment Ind 757-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition and concerns related to the proposed project. Please see Master Response 1. Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, as well as Response to Comment Ind 733-4; regarding traffic concerns, please see Chapter 4.12, Transportation, which determined that all project-related traffic impacts could be fully mitigated except impacts at SR 174/ Brunswick Road (level of service impact) and Brunswick Road/Sutton Way (queuing impact in cumulative scenario); regarding the generally noted dust concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. In addition, pursuant to Mitigation Measure 4.3-2, the project must ensure that visible dust does not cross the boundary of the property and that the project is in compliance with the approved Asbestos Dust Mitigation Plan and would be required to take whatever necessary measures to ensure compliance.

Regarding climate change, please see Master Response 16 – Drought and Climate Change.

Regarding well impact concerns, please see Chapter 4.8 and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Property value concerns are outside the scope of CEQA – please see Master Responses 1 and 2.

Individual Letter 758

From: Susan Buzzini <suebuzzini@gmail.com>
Sent: Monday, April 4, 2022 4:25 PM
To: Idaho MMEIR
Subject: environmental impact report-Rise Gold

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Ind 758-1

My name is Susan Kemp, and I own a home at 122 Stanford Ct. Grass Valley, CA 95945.

First off, I want to thank you for giving our community many opportunities for input regarding such an important issue as Rise Gold. My major concerns and worries about the environmental report are as follows. First, is the noise I believe will be associated with a mining operation. Due to the increased freeway noise in the Cypress Hills area, I am disheartened by the possibility that the constant roar of mining trucks will exacerbate an already existing and growing noise problem. In addition, what about wear and tear upon our roads? Second, our water is a resource more valuable than gold, when one considers an enduring drought that has plagued our community as well as the entire West Coast. Pumping vast amounts of water into our creeks must certainly affect our aquifers. It's not enough for Rise Gold to tell the most affected that their problems will be mitigated. How will such a huge drainage of a much needed resource affect a much larger area? Third, what about the air quality? We already get enough smog and pollutants from the valley. It worries me to think that even the tiniest amount of asbestos, for instance, could linger in the air and affect our community's health. And this mining operation is to last 80 years? Fourth, I believe the aesthetics of the area will be hampered immeasurably. I don't want to live where I see swaths of trees cut down to make way for enormous piles of tailings. I don't want to see glaring mine lights that hide the stars. I want to see clear streams, catch glimpses of wildlife- - yes, even the willow flycatcher. I want to breathe in clean air and experience quiet. So do many, many others. Let's not trade the "gold" we have now for a mining operation that is fraught with so many environmental negatives. Thank you.

1

INDIVIDUAL LETTER 758: SUSAN KEMP

Response to Comment Ind 758-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Mitigation Measure 4.12-6(b) requires that prior to commencement of engineered fill hauling, the Project Applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49, and E. Bennett Road between the Project Driveway and Brunswick Road. (DEIR, p. 4.12-91.)

Regarding water and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells and Master Response 16 – Drought and Climate Change.

Regarding discharge of treated groundwater, please see Master Response 35 – Discharge to South Fork Wolf Creek.

Regarding asbestos concerns, please see Response to Comment Ind 686-2.

Regarding aesthetics concerns, the DEIR already concludes that the project would substantially degrade the existing visual character or quality of public views of the project sites or the site surroundings (page 4.1-22). Implementation of Mitigation Measure 4.1-2 would reduce the significant impact by requiring more dense plantings along the project frontages to screen project structures to the maximum extent feasible. However, given the proposed heights of the structures and the permanent alteration of the views, the impact would remain significant and unavoidable. In addition, as stated on page 4.1-29, long-term changes in visual character associated with the project in combination with cumulative development, is cumulatively considerable and significant and unavoidable.

The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 759

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: Susan Merrill

Address: 115 Union Jack #47, GV, 95945

Organization (if applicable): UUCM Social Justice Task Force

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 759-1

Almost 50 items that say will have significant impact. ~~that~~ Rise says it will submit the mitigation reports at "a later date." These should not be in the DEIR.

INDIVIDUAL LETTER 759: SUSAN MERRILL

Response to Comment Ind 759-1

All project-related impacts could be reduced to a less than significant level through implementation of mitigation with a few noted exceptions. As noted in Chapter 5 of the DEIR, the proposed project would result in significant and unavoidable impacts related to aesthetics (substantial degradation of the existing visual character or quality of the site and its surroundings), and transportation (intersections of SR 174/Brunswick Road and Brunswick Road/Sutton Way). The DEIR provides substantial evidence that all other impacts would either be less than significant or less than significant with implementation of the mitigation measures incorporated into the DEIR. These mitigation measures will be made enforceable by state law through adoption of the mitigation monitoring and reporting program, included as Chapter 4 of this Final EIR.

The commenter's reference to an applicant statement that mitigation reports will be submitted at a later date is unclear. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 760

absolutely do NOT

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

EIR "solutions/mitigations" are completely inadequate

Name(s) Susan B. Reynolds

Address PO Box 2576 Nevada City CA ZIP 95959
523 Silva Ave, NC 95959

Phone (530) 265-0216

Email Address susanbr@sierra email.com

Ind 760-1

INDIVIDUAL LETTER 760: SUSAN REYNOLDS

Response to Comment Ind 760-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 761

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Av. Ste. 170
Nevada City CA 95959

Susan Turney
Edward Sherman
15385 Nancy Wy
Grass Valley CA 95949

We are not in favor of re-opening the Idaho-Maryland Mine for the following reasons:

Rise Gold issued a press release on 2/8/22, available to read on NASDAQ. com based upon the result of their recent postcard survey sent to "selected" Nevada County residents, " showing strong support" for re-opening the mine. The press release is full of forward-looking statements such as" expect, plan, project, believe." The results of re-opening the mine may materially differ from these statements, and Rise Gold is under no obligation to update these anticipatory statements.

Ind 761-1 It appears Rise Gold is attempting to attract investors to buy stock in their golden jackpot fantasy during the current inflationary period. Gold trading and gold futures, being market driven, offer no long term stability to the projected 80 year operation of the mine. The mine operation is, in fact, the extraction of non-renewable resources, using vast quantities of non-renewable resources, and then shipping the extracted resources out of Nevada County. This produces nothing of inherent value for Nevada County residents at a significant, unavoidable cost to local residents.

The EIR presents hypothetical impacts based upon best-case scenarios in current environmental conditions, without regard to drought, or other climate change factors.

Ind 761-2 For example, the projected use of 11 million gallons of water to be supplied by NID, solely for " dust control" during the preparation phase. This is more water than the population of Grass Valley would use, based upon average household water use, for one year.

Has NID factored this projected demand into their current planning?

Ind 761-3 When operational, the projected electrical demand of the mine would be 500,000 Mwh per year. This translates to using the same amount of electricity required to power 50,000 households for one year. Again , the mine would consume more resources than the city of Grass Valley.

Nevada County has unmet goals for its Ozone Management Plan. Re-opening the mine will

Ind 761-4 further degrade local air quality by increasing greenhouse gas emissions.

For example, from the projected " 100 round-trips from 6 a.m. to 10 p.m. every day" hauling waste rock by diesel powered trucks. Add impacts to air quality from blasting, rock crushing and pumping to further degradation.

The categories in the EIR that list significant unavoidable negative impacts, even with

Ind 761-5 mitigation, are: noise, traffic, road damage, and the visual character of the area.

The best-case scenarios list probable decibel levels for all above-ground mining activities as just under the threshold where sleep is interrupted.

Ind 761-6 In addition to altering the visual character of the area, there will be negative impacts to sensitive species of plants, Sierra frogs and bird life on the site.

Ind 761-7 In view of the many negative impacts to Grass Valley and Nevada County, should the mine be

re-opened, the positive impacts are defined as: 162 new job positions for " trainees" at undefined wages. There is a projected need for approximately 50 qualified equipment operators at undefined wages. The balance of employees will be recruited from outside of Nevada County; those with expertise in the technical aspects of gold mining operations, at undisclosed wages. The report concludes, "there will be no significant inducement to local growth." The mine will not produce a job bonanza for local residents.

There are already 212 unfilled job openings in Nevada County.

The negative impacts and the no-impact conclusions in the EIR far outweigh the projected positive economic impacts for residents of Nevada County.

Ind 761-8

Sincerely,

Susan Turney

Edward Sherman

INDIVIDUAL LETTER 761: SUSAN TURNEY

Response to Comment Ind 761-1
The commenter states that the project will not improve the surrounding community. The commenter's opposition of the project is noted for decisionmakers. See Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 761-2
The commenter states that the DEIR does not adequately analyze the amount of water to be used by the project during the drought and questions if NID has factored in this water usage. The commenter is referred to Master Response 16 - Drought and Climate Change, Chapter 4.11, and Appendix N of the DEIR.

Response to Comment Ind 761-3
The commenter states that the project would use 500,000 MWh per year. However, as stated on page 4.3-88 of the DEIR, the project is anticipated to result in increased electricity consumption of 16,513 MWh during the year of construction and 49,613 MWh annually during operations.

Response to Comment Ind 761-4
The commenter states that the project's GHG-related emissions will impede the County's ozone management plan. Ozone is not related to GHG emissions. As stated on page 4.3-2 of the DEIR, ozone is a reactive gas consisting of three oxygen atoms. In the troposphere, ozone is a product of the photochemical process involving the sun's energy, and is a secondary pollutant formed as a result of a complex chemical reaction between reactive organic gases (ROG) and oxides of nitrogen (NO_X) emissions in the presence of sunlight. As such, unlike other pollutants, ozone is not released directly into the atmosphere from any sources.

As stated on page 4.3-91 of the DEIR, global climate change is, by nature, a cumulative impact. Emissions of GHG contribute incrementally to adverse environmental effects associated with global climate change (e.g., sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts). Because climate change is a global phenomenon, a single project could not generate enough GHG emissions to contribute noticeably to climate change.

Air emissions from all project activities have been analyzed in the DEIR. The commenter is referred to Chapter 4.3 of the DEIR.

Response to Comment Ind 761-5
The commenter states that the DEIR discusses impacts that are significant and unavoidable. The commenter also states that noise-related impacts will occur just below the threshold for sleep interruption. Significant and unavoidable impacts are presented in Section 5.6 of the DEIR.

Project noise is not just under the threshold where sleep is interrupted. The commenter is referred to Response to Comment Grp 21-130.

Response to Comment Ind 761-6
The commenter states that the project will result in biological impacts. Impacts to plants, frogs, and birds are less than significant after mitigation. The commenter is referred to Chapter 4.4 of the DEIR, Master Response 31 - Rare Plants, Master Response 37 - Birds and Raptors, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Ind 761-7

The comment states that the DEIR overstates the employment benefits of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 761-8

The commenter states that the employment benefits of the project are outweighed by the environmental impacts. The commenter's opposition of the project is noted for decision makers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 762

From: sgwilson
To: Idaho MMEIR
Subject: Stop the mine
Date: Wednesday, March 30, 2022 3:20:24 PM

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Ind 762-1

Just a few words to let you know I do not want you all to okay the mine project. All that I have read and all the conservations I have had lead me to believe that opening the mine is one of the WORST ideas that you all have considered. With the mine Nevada County will not gain anything rather it will lose the peace, the clear air, and the quiet that we all love. Not to mention people who will chose to leave because of the mine. Pleasefollow the will of the people and the idea it will being money to the county. Susan Wilson a citizen of Nevada County for over 40 years.

INDIVIDUAL LETTER 762: SUSAN WILSON

Response to Comment Ind 762-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record, and forwarded to the decision-makers for their consideration.

Individual Letter 763

From: Susanna Wilson <osus@pacbell.net>
Sent: Wednesday, March 30, 2022 12:24 PM
To: Idaho MMEIR
Subject: The Mine Re-Opening

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Ind 763-1

Recently a "test" was done at the proposed mine site. I live near Scotia Pines, on Carpenter Street, in a historic Victorian. My house shook, tea cups rattled and the animals (a dog and a cat) jumped and hid.

Although my home is old, and has new foundations built to current codes, I dearly love my home. I cannot believe I would have to live with this shaking and booming noise if this mine reopens!

I was born and grew up in Grass Valley during the time of the stamp mills. We still deal with the toxics left by those days. Enough I say!

Susanna Wilson

INDIVIDUAL LETTER 763: SUSANNA WILSON

Response to Comment Ind 763-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concern regarding alleged on-site testing which is not part of the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decision-makers for their consideration. For concerns related to noise and vibration, please refer to Chapter 4.10, Noise and Vibration.

Individual Letter 764

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley plans to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Developing the mine will create over 300 new employee-owned safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous communities.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to play a part of local economy by strongly supporting the re-opening of the Idaho-Maryland Mine!

We do not support the reopening of the Idaho-Maryland mine! Please keep it closed

Dist 2

RECEIVED
FEB 23 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) Suzanne & Kevin Costa

Address 18637 Joseph Dr Grass Valley ZIP 95949

Phone 413 575 2355

Email Address scosta1@comcast.net

Ind 764-1

INDIVIDUAL LETTER 764: SUZANNE AND KEVIN COSTA

Response to Comment Ind 764-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 765

RECEIVED
MAR 31 2022
County of Nevada
County Dev Attorney
CDA Fiscal

Date: 3/30/22

To: Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us
(530) 265-1423

From: Suzanne and Rob Ferroggiaro
13340 Lower Colfax Rd.
Grass Valley, CA 95945
suzanneferro17@gmail.com
530-477-5344

Re: Comments on Idaho-Maryland Mine Project Draft EIR

Dear Mr. Kelley and Planning Department,

Thank you for your work on this complex issue.

We are writing as:

~ 14 yr. residents of Nevada County;

~ long-term supporters/volunteers of Wolf Creek Community Alliance, (former WCCA volunteer Restoration Coordinator);

~ long-term supporters/volunteers of South Yuba River Citizens League, (former SYRCL volunteer Clean-Up Site Coordinator);

~ long-term supporters/volunteers of Redbud Chapter of California Native Plant Society, CNPS;

~ past Chair of the Maidu Interpretive Center Foundation, Roseville, CA; and

~ as a resident with asthma.

Ind 765-1

After reading the Draft EIR, we strongly urge the Nevada County Planning Department to reject the Idaho-Maryland Mine Project (IMMP) for the multiple reasons listed below as comments on the Draft EIR, and for these overarching general comments below.

Four General reasons for denying Idaho-Maryland Mine Project:

Ind 765-2

1. After over 170 years, Nevada County is still cleaning up, mitigating for, and living with the environmental disasters from previous mining operations. Regardless of the best plans and best

practices for mining projects, unforeseen problems create environmental disasters for future generations.

2. Rather than waiting to receive proposals to resurrect similar previous disastrous mining projects, we strongly urge the NC Planning Dept. to actively seek out forward-looking projects that would be beneficial to our community such as solar power manufacturing/generation or biofuels processing/generation, etc.

Ind 765-3

3. Regardless of written plans and intentions, the Draft EIR begs the questions: How much will these plans insure that workers try to avoid damage in the moment during work? How much damage will they actually avoid in the moment during work? And how much success will there be with mitigation for damage done?

Ind 765-4

4. Lastly, we respectfully suggest that in Table 2-1, "Level of Significance" related to mitigation, there should be a category of "SA, Significant AND Avoidable", by rejecting the project.

Specific Comments on Draft EIR for rejection of Idaho-Maryland Mine Project:

Ind 765-5

Pg. 53-54 2.2 Summary Description of Proposed Project, Management Plans:

We object that all 5 sub points require County approval for the IMMP to disregard/ignore well thought out and reasonable requirements of 100' setbacks, steep slopes, and grading to keep Wolf Creek safe and sound.

Pg. 55 2.4 Summary of Project Alternatives, Alternative 1: No Project (No Build) Alternative:

Ind 765-6

It is incumbent upon the NC Planning Dept. to evaluate other site project options to create a sustainable, environmentally sound, and community appropriate project. The EIR requires the NC Planning Dept. to identify environmentally superior alternatives "...from among the range of reasonable alternatives that are evaluated." This Draft EIR's major flaw is that it does not evaluate any other reasonable alternatives to the IMMP, such as solar manufacturing/generation, or biofuel processing/generation, etc.

Ind 7656-7

Pg. 58-59 2.5 Areas of Known Controversy

All 23 items on this list are supporting reasons for rejecting the Idaho-Maryland Mine Project.

Pg. 60-158 Table 2-1 Summary Impacts and Mitigation Measures

Ind 765-8

4.1-2, Items #5-8

Existing native vegetation cannot be "repaired or replaced" adequately due to variety of plants, size of plantings, timing of planting, and irrigation needs. Level of Significance After Mitigation should be "SA, Significant and Avoidable".

Ind 765-9

4.3, 1-7

Totally inadequate mitigations. Air Quality, Greenhouse Gasses, and Energy usage should be monitored and reported daily; how will these be enforced? "...efforts to comply" equals non-

compliance. ..."sensitive receptors" means people! "... visible dust": what about invisible particles, which are most likely more damaging?

4.3-4-9

Ind 765-10 In this era of climate crisis, this cannot be "LS, Less Than Significant", or "LCC, Less Than Cumulatively Considerable"; LS and LCC designations basically say that IMMP does not need to comply with requirements which have been created for the health of all. Mitigation Measures refer only to construction, but neglect operation after construction. Even with carbon offsets verified, there will be more GHG locally.

4.4-1(a)

Ind 765-11 In all sections of Mitigation Measures for vegetation, California Native Plant Society, Redbud Chapter should be included in monitoring. It is a valuable local resource with abundant local knowledge of local native plants.

4.4-1(b)

Ind 765-12 IMMP should not be in protected Riparian Zone in the first place. Mitigation Measures should include not only bulbs, but root balls. 80% down to 50% survival is not successful.

4.4-2 (a-g)

Ind 765-13 All of these animals are the reasons for not approving a variance to the 100' setback from the Riparian Zone.

4.4-3

Inability to truly mitigate loss of riparian habitat is one more reason for not approving a variance to the 100' setback.

4.4-3(b) Implement Post-Construction Erosion Control

Ind 765-14 "...erosion control mixture" should be all native plants.

4.4-3(c)

Ind 765-15 ... "Section 404 permit... for fill" is an egregious mitigation. Wetlands cannot be successfully mitigated, restored, or created and paying an "in lieu fee" or buying credits does not protect local wetlands on site, which are part of the approximately 2% of wetlands left in California.

4.4-3(d)

Ind 765-16 ..."initiating ground disturbing activities within the non-disturbance buffers"... is an oxymoron; no Section 1600 Streambed Alteration Agreement should be approved based on this contradiction.

4.4-4

Ind 765-17 IMMP does substantially interfere with movement of native wildlife species by virtue of its existence.

Ind 765-18	4.4-6 Level of Significance After Mitigation should be "CC, Cumulatively Considerable".
Ind 765-19	4.5-2 Mitigation Measures: Both a qualified archeologist trained in local culture and also a representative of our local Nevada City Nisenan Rancheria should be on site during construction and mining activities, (not just after a bulldozer operator or mining worker, who are not trained to recognize archeological artifacts, uncovers artifacts, which may or may not cause a work stoppage); add consultation with the California Native American Heritage Commission.
Ind 765-20	4.6-2 Mitigation Measures: ..."substantial erosion"... should be "S, Significant" and "CC, Cumulatively Considerable", since even with Mitigation Measures, IMMP will be affecting Wolf Creek negatively.
Ind 765-21	4.7-1 and 2 Even with Mitigation Measures and despite Best Management Practices, there are still significant dangers of hazardous materials to the public; designation should be "SA, Significant and Avoidable".
Ind 765-22	4.7-4 and 5 Yes IMMP would impact emergency response and emergency evacuation plans due to excessive truck use of roadways; should be designated "S, Significant" and "CC, Cumulatively Considerable".
Ind 765-23	4.8-1 Designation should be "SA, Significant and Avoidable" or at a minimum, "S, Significant" and "CC, Cumulatively Considerable" because of ..."potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron manganese, pH, total suspended solids, TDS, and cis-1, 2-DCE". Monitoring reports (and NOI) should be daily or weekly, not quarterly, and should go to Nevada County, Wolf Creek Community Alliance (WCCA), and South Yuba River Citizens League (SYRCL) in addition to RWQCB.
Ind 765-24	4.8-5 "Grading and land disturbance within the limits of the SFHA (100-year floodplain) of Wolf Creek shall be avoided." "Areas within 100 feet of the 100-year floodplain, which are disturbed due to construction activity..." These statements are contradictory, and the second one shows a disregard for the importance of the 100' setback regulations.
Ind 765-25	4.8-7 These impacts are very "S, Significant" and "CC Cumulatively Considerable" to Wolf Creek, not "LS" as stated.

Ind 765-26	4.10-2, 2 (a) and 3, 2 (bi and bii) Designation should be "S, Significant" and "CC, Cumulatively Considerable". Noise monitoring evaluation should be weekly for the duration of the IMMP; 30 days is too long between monitoring evaluations when listening to loud noises. Receptor locations should be at a minimum of 5 locations, not 3-5 as stated in that section; and should be at specifically pinpointed locations, not in "surrounding" area as stated.
Ind 765-27	4.11-7 Designation should be "S, Significant" and "CC, Cumulatively Considerable" since sufficient water supplies cannot be guaranteed in the severe, extreme drought we are experiencing.
Ind 765-28	4.12-1 (b) ..."the fair share percentage is 14.9%." for Traffic Mitigation Agreement. This is not a fair share for work strictly necessitated because of the IMMP.
Ind 765-29	4.12-5 Designation should be "S, Significant"; "CC, Cumulatively Considerable"; or "SA, Significant and Avoidable".
Ind 765-30	4.12-6 (a) dot #13 Add requirements to continuously monitor wild fires within 10 mi. proximity and immediately stop all truck work on roadways to allow for public emergency evacuation on public roadways.
Ind 765-31	4.12-10 "the fair share is 8.5 percent." Again, this is not a fair share for work strictly necessitated because of the IMMP.
Ind 765-32	4.13-1 Designation should be "S, Significant", and "CC, Cumulatively Considerable" or "SA, Significant and Avoidable" because the increased truck traffic substantially impairs emergency evacuation.
Ind 765-33	4.13-2 (last dot) ..."in accordance with the State Board of Forestry and Fire Protection's, "General Guidelines for Creating Defensible Space, February 8, 2006". These guidelines are 16 yrs. out of date; use current Nevada County guidelines for defensible space.

Again, thank you for your work on this complex issue.

Sincerely,

Suzanne Ferroggiaro

Rob Ferroggiaro

INDIVIDUAL LETTER 765: SUZANNE AND ROB FERROGGIARO

Response to Comment Ind 765-1
This is an introductory comment. Please see Master Response 1 - Non-EIR/Administrative Issues. Comment noted.

Response to Comment Ind 765-2
The commenter's opposition to the project is noted for the decisionmakers. Please see Master Response 1, Non-EIR/Administrative Issues.

Response to Comment Ind 765-3
The commenter speculates as to whether, and to what extent, workers will try to avoid damage while doing work. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." This comment is speculative and does not require a specific response. Nevertheless, it is noted that a mitigation monitoring and reporting program has been prepared and is included as Chapter 4 of this Final EIR. The mitigation measures and conditions of approval will be enforced by the County. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement.

Response to Comment Ind 765-4
The comment is unclear. Table 2-1 already has an "SU" category for significant and unavoidable.

Response to Comment Ind 765-5
DEIR Section 2.2 is a list of all entitlements and approvals sought by the applicant and required in order to construct and operate the project as proposed. The commenter's concerns have been forwarded to the decisionmakers. Please see Master Response 1.

Response to Comment Ind 765-6
DEIR section 6 considered project alternatives. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Solar manufacturing/generation and biofuel processing/generation would not achieve many of the project objectives and would also not be feasible as those businesses required specialized expertise not held by the applicant. Further, the commenter's description of these proposed alternatives is undefined, so it is unclear whether these proposals would avoid any significant impacts of the project or would create new significant impacts. As these proposed alternative uses do not achieve many project objectives, would not be feasible due to the need for specialized expertise, and are not formulated specifically enough that they could be shown to reduce any significant project impact, no further consideration is required.

Response to Comment Ind 765-7

This list is a summary of issues identified during the scoping process and helped guide which issues to analyze in the DEIR.

Response to Comment Ind 765-8

The commenter's concerns are noted. Mitigation Measure 4.1-2 requires the applicant to submit a Landscape Plan concurrent with improvement plan review and outlines the required information for inclusion in that landscape plan.

Response to Comment Ind 765-9

The comment is somewhat unclear and the request for daily air quality monitoring is not supported by the DEIR analysis. The commenter provides no substantial evidence as to why daily air quality monitoring would be needed. Nevertheless, it is noted that Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring.

Response to Comment Ind 765-10

DEIR Impacts 4.3-7 and 4.3-8 analyzed the project's contribution of greenhouse gases and recommended Mitigation Measures 4.3-7(a & b) to reduce the construction GHG emissions impact to a less than significant level. Operational GHG emissions are below the threshold and are therefore considered less than significant. As shown in this impact analysis, specifically Table 4.3-23, the entire life of the project was analyzed and not just construction. Please see Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Ind 765-11

As is standard practice, there are federal and state agencies that have the requisite expertise to monitor the successful implementation of biological mitigation measures concerning protected species.

Response to Comment Ind 765-12

Mitigation Measure 4.4-1(b) requires the preparation of a habitat management plan if special status plant species are identified during preconstruction surveys. The requirements listed in Mitigation Measure 4.4-1(b) are the minimum requirements for the habitat management plan and, during County review and approval, can be modified or changed to be more protective if necessary.

Response to Comment Ind 765-13

Mitigation Measures 4.4-2(a-g) outline the specific measures for protection of special status species that may be identified onsite.

Response to Comment Ind 765-14

Mitigation Measure 4.4-3(b) requires the preparation of a Watercourse/Wetlands/Riparian Areas management plan. The requirements listed in Mitigation Measure 4.4-3(b) are the minimum requirements for the habitat management plan and, during County review and approval, can be modified or changed. Native plants will be used for erosion control, when appropriate.

Response to Comment Ind 765-15

Mitigation Measure 4.4-3(c) provides for a variety of methods to mitigate the potential impact that will require consent and approval of the United States Army Corps of Engineers and/or California Department of Fish & Wildlife.

Response to Comment Ind 765-16

The authority to approve a Section 1600 Streambed Alteration Agreement is vested with the California Department of Fish & Wildlife. It is important to clarify that the County Land Use Development Code allows encroachments within non-disturbance buffers so long as an adequate Watercourse, Wetlands, and Riparian Areas Management Plan is prepared, approved by the County, and implemented by the Applicant, subject to County oversight. Said Management Plans have been prepared for the project (see DEIR Appendix F.5 and Appendix F.8).

Response to Comment Ind 765-17

The CEQA guidelines require analysis of substantial interference to "the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites." Migration is defined as the seasonal movement of animals from one habitat to another. Various animal, bird, and fish species are not automatically considered migratory just because they move from one location to another. Migration serves a purpose for the species such as winter/summer habitat for foraging or breeding. It is acknowledged and analyzed in the DEIR impact analysis (see section 4.4.4) that species exist within the project site that are common to the area. Potential impacts to these species were analyzed and mitigation measures have been provided where it was determined impacts to species could occur as a result of project activities, including the implementation of preconstruction surveys and agency permitting requirements. The only migratory species corridors acknowledged by the County General Plan are deer migration corridors. Impact 4.4-4 addressed the project's impact to this potential migratory corridor and concluded that it would be less than significant.

Response to Comment Ind 765-18

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-19

As noted in DEIR section 4.5.4, and Appendix G, the Historic Properties Inventory and Finding of Effect included a cultural records search, literature review, consultation with the Nevada County Landmark Commission, consultation with the NAHC, and a field survey. The DEIR identifies the potential cultural resources onsite and includes mitigation measures to reduce the potential impact (see Mitigation Measures 4.5-1(a & b)). Given the sites' history of significant surface disturbance it is unlikely cultural resources are still intact. In the event unidentified resources are discovered, Mitigation Measures 4.5-2 and 4.5-3 require the appropriate coordination and consultation consistent with the California Environmental Quality Act, Secretary of the Interior, and County Code.

The County attempted to consult with interested tribal groups and none responded to the request for consultation within the statutory consultation timeframes (e.g., see responses to Group Letter 14).

Response to Comment Ind 765-20

The commenter does not provide any additional information and evidence to support a change in the significance determination.



Please see Master Response 36 - Flows in South Fork Wolf Creek, and Master Response 35, Discharge to South Fork Wolf Creek.

Response to Comment Ind 765-21

DEIR Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.8, Hydrology and Water Quality, analyzed impacts related to hazardous materials and found all potential impacts to be less than significant after implementation of mitigation. The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-22

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 765-23

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 35 – Discharge to South Fork Wolf Creek. Water quality monitoring requirements are dictated by the Regional Water Quality Control Board who will have the authority to enforce water quality standards.

Response to Comment Ind 765-24

Mitigation Measure 4.8-5 requires the implementation of the Floodplain management plan. Requirements listed in Mitigation Measure 4.8-5 are to ensure that when working within 100 feet of the SFHA (100-year floodplain) that grading within the limits of the SFHA (100-year floodplain) shall be avoided. The 100-foot buffer from the SFHA floodplain is a different area than the 100-foot floodplain area and therefore the mitigation measure is not contradictory.

Response to Comment Ind 765-25

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-26

Noise monitoring required by Mitigation Measure 4.10-3 is continuous and reported to the County on a regular basis for review. The initial 30-day report is after the start of operations to ensure the noise predictions in the DEIR were accurate, and if County noise standards are exceeded, operations must cease until additional engineering controls to reduce noise levels can be implemented. After this initial analysis, analysis of the permanent continuous noise monitoring is required to be submitted to the County quarterly. The monitoring timing was independently reviewed by a third-party technical noise expert, under contract with Raney, who has experience conducting noise monitoring at active mine sites.

Response to Comment Ind 765-27

The commenter does not provide any additional information and evidence to support a change in the significance determination. Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

Response to Comment Ind 765-28

The fair share percentage is based on the project's traffic volume it adds to the existing traffic levels. Requiring the applicant to pay 100% of traffic fees for only contributing a minor amount of traffic would be unconstitutional.

Response to Comment Ind 765-29

The commenter does not provide any additional information and evidence to support a change in the significance determination.

Response to Comment Ind 765-30

Mitigation Measure 4.12-6 requires the preparation of a traffic control plan for the construction phase of the project. The requirements listed in Mitigation Measure 4.12-6 are the minimum requirements for the traffic control plan and, during County review and approval, can be modified or changed by County Public Works. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 765-31

The fair share percentage is based on the project's traffic volume it adds to the existing traffic levels. Requiring the applicant to pay 100% of traffic fees for only contributing a minor amount of traffic would be unfair.

Response to Comment Ind 765-32

The commenter does not provide any additional information and evidence to support a change in the significance determination. Please see Master Response 5 - Evacuation Zones.

Response to Comment Ind 765-33

DEIR section 4.13 analyzed the project's potential to increase wildfire risk. DEIR section 4.13.3 specifically identifies various State and County regulations including County General Plan policies, emergency operations plan, local hazard mitigation plan, and the County community wildfire protection plan. Consistency with these requirements and plans was analyzed in DEIR impact 4.13-1 and considered less than significant. Please see Master Response 6 - Wildfire Impacts.

Individual Letter 766

April 3, 2022

To Whom It May Concern:

I have been a resident of Nevada City since 2009 and immediately fell in love with its river, forest, flora and fauna. I am now a mother and a teacher who respects and honors the Nisenan people. Enough devastation has been carried out on their lands which they stewarded for thousands of years and continue to steward. As stewards of this land we must be conscientious as to how we treat our water, air, wildlife. This mine, no matter how well its presented, will devastate and dry wells, and release contaminants into the environment. I am opposed to this mine full stop. Below are some points from the Community Environmental Advocates Foundation which I echo:

Ind 766-1

Ind 766-2

"Dewatering the mine is a key concern. "Groundwater modeling in fractured rock systems is considered unreliable even when everything is done right," said Silberstein. According to experts, Rise Gold's model has fundamental flaws in the initial start point of the model and baseline data assumptions – all of which throw off the entire analysis. The result is a DEIR that concludes that groundwater levels would drop a maximum of 10 feet and no more than 30 local wells would be a risk. Experts, however, recognize the extremely high degree of uncertainty involved. Comments submitted to the County by the community and the Nevada Irrigation District (NID) include requests to expand the potential area of impact, provide a comprehensive groundwater monitoring program, and post a $14 million bond.

Ind 766-3

Dealing with mine waste is another major concern. "Looking at the rock core sample analysis, it is abundantly clear that asbestos will be a gnarly problem that will require comprehensive management. Mining operations don't get to just haul and dump rock like the days of old," said Silberstein. "Air and water quality regulations will significantly restrict throughput and the costs will be exorbitant." Experts found the plans to mitigate fugitive dust to be inadequate. They also found no credible evidence that the mine tailings could be effectively sold to 3rd parties for fill or offsite construction.

Ind 766-4

Climate change has increased forest fires and parched lands, resulting in the newest Federal and State greenhouse gas reduction goals. The DEIR used a threshold of 10,000 metric tons per year for greenhouse gas emissions but failed to include some elements that puts the project over that limit and makes it a significant impact. In the long run however, the limit defined in the DEIR is likely to be found irrelevant. Recent changes mean the County's threshold must be established at "net zero".

Ind 766-5

Following is a quick list of additional gaps in the draft:

- Cleanup of the toxic, pre-superfund Centennial site that would be used to dump mine waste is not included in the DEIR but is required by the California Environmental Quality Act (CEQA).

Ind 766-6

- Missing construction time estimates throw off the entire analysis of noise, traffic, and air.

Ind 766-7

- The DEIR incorrectly assesses nighttime noise and underestimates the noise of dumping mine waste near established residential neighborhoods.

Ind 766-8

- Air traffic hazards and aesthetic impacts need to be studied further due the likelihood of a massive fog plume that could be created by warm, saturated air ventilation.

Ind 766-9

- Blasting plans don't follow U.S. mining guidelines that restrict blasting during evening hours.

Ind 766-10

- The plan doesn't demonstrate that the impact on biological and aquatic resources would be less than significant.

- Meteorological data used to assess the health risk of airborne pollutants doesn't fit Grass Valley's profile or accurately reflect local conditions."

Ind 766-11

Please, please, preserve our human community and our animal and plant communities and DO NOT allow this mine to move forward.

Thank you,

Suzanne Hall

INDIVIDUAL LETTER 766: SUZANNE HALL

Response to Comment Ind 766-1
The commenter is opposed to the project for cultural and environmental impact reasons. The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 766-2
The commenter states that the DEIR's analysis regarding the dewatering of the mine is flawed due to inaccurate baseline assumptions and the commenter requests that the DEIR expand its potential area of impact, implement a groundwater monitoring program and post a $14 million bond. The commenter is referred to Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 766-3
The commenter is concerned with asbestos-related impacts and states there is no evidence that mine tailings could be sold to third parties for offsite construction. The commenter is referred to Chapter 4.3 of the DEIR, Master Response 23 - Adequacy of Asbestos Sampling, Master Response 22 - Conservatism of Asbestos Assumptions, Master Response 8 - Mine Waste Characterization, and Master Response 11 - Engineered Fill Utilized in Local and Regional Construction Markets.

Response to Comment Ind 766-4
The commenter states that the GHG threshold for air quality impacts must be net zero. The commenter is referred to Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Ind 766-5
The commenter states that CEQA requires that the cleanup of the Centennial Industrial Site be included in the DEIR. The commenter is refereed to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 766-6
The commenter states that the DEIR omits construction time estimates which skew the analysis of impacts. The commenter is referred to Master Response 24 - Project Construction Schedule.

Response to Comment Ind 766-7
The commenter states that the DEIR incorrectly assesses nighttime noise and underestimates noise of dumping mine waste near residential neighborhoods and that all work needs to be done during regular working hours. However, nighttime noise and dumping of mine waste is analyzed in the DEIR and is less than significant after mitigation. (DEIR, p. 4.10-31.) Please see Responses to Comments Grp 21-130 and Grp 21-131.

Response to Comment Ind 766-8
The commenter states that the DEIR must account for air traffic hazards and aesthetic impacts resulting from a potential fog plume. The commenter is referred to Response to Comment Grp 7-95.

Response to Comment Ind 766-9
The commenter states that the DEIR does not adhere to federal mining guidelines for blasting during evening hours. The commenter is referred to Response to Comment Grp 21-144.

Response to Comment Ind 766-10

The commenter states that the DEIR does not demonstrate the impacts to biological and aquatic resources would be less than significant but provides no further details. The commenter is referred to Chapters 4.4 and 4.8 of the DEIR.

Response to Comment Ind 766-11

The commenter states that meteorological data used in the health risk assessment does not reflect local conditions. The commenter is referred to Master Response 17 - Meteorological Data Used in HRA. The commenter's opposition to the project is noted for decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 767

March 30, 2022

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA. 95959-7902

RE: Review of the Draft EIR for the Proposed Idaho-Maryland Mine

Dear Matt Kelley,

Thank you for the opportunity to comment on the Draft EIR for the proposed Idaho Maryland Mine project, State Clearinghouse Number 2020070378. My comment are included below.

Ind 767-1 Overall the document is difficult to read and cumbersome as well as incomplete in its review of many issues on the proposed project as well as discussion on the Reclamation Plan and documents. The Reclamation Plan is a project under CEQA and the impacts must be analyzed in a CEQA document. Including brief discussions on the Reclamation Plan in different sections of the DEIR does not constitute full CEQA review of the project.

The following section is a discussion on Land Use includes comments on the County's processing of the project's rezoning proposal, which should be discussed in the analysis of this project. My comments on the rest of the DEIR follow this section.

Land Use

Volume 1 - page I-1 of the Nevada County General Plan:

Ind 767-2 The County, in response to key issues affecting the County's quality of life, has established four central themes which articulate the vision for the development of the County:

1. Fostering a rural quality of life;
2. Sustaining a quality environment;
3. Development of a strong diversified, sustainable local economy; and
4. Planned land use patterns will determine the level of public services appropriate to the character, economy and environment of each region.

Section L-II 1.1 Authority and Purpose Nevada County Zoning Ordinance

The zoning ordinance is adopted in order to achieve the following objectives:

A. To serve as the primary tool to implement and ensure consistency with the goals, objectives, and policies of the Nevada County General Plan based upon the following central themes:
1. Fostering a rural quality of life.
2. Sustaining a quality environment.

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3. Development of a strong diversified, sustainable local economy.
4. Planned land use patterns to determine the level of public services appropriate to the character, economy, and environment of each region.

Both the General Plan and Zoning Ordinance have as key issues for consistency for development within the County the "Fostering of a rural quality of life, sustaining a quality environment, development of a strong diversified, sustainable local economy, and planned land use patterns to determine the level of public services appropriate to the character, economy, and environment of each region, A project requiring a rezoning to mining uses partially located within the Rural Region of the County (inconsistent with the General Plan) adjacent to residential uses, does not provide the consistency with General plan or Zoning Ordinance envisioned by the creators of the documents. Beyond showing which General Plan policies the proposed project is attuned to the Draft EIR should provide the Policies that the project is not in compliance with.

The County's Zoning Ordinance, Section L-II 1.4, Rules of Interpretation for the rezoning of the SP portion of the project requires findings 1 through 4, see section below, for the removal of the SP Zoning District and the application of the ME zoning, which is required for mining uses. The Rules of Interpretation, as shown below, allow for the Planning Director to determine an allowable use, if the Director finds the use will, among other findings, share characteristics common with those listed in the district and not be of greater intensity of density, generate greater impact on public facilities and services, or generate more environmental impact than the uses listed n the district.

Ind 767-3

The Rezoning from M1-SP site performance standards applied to Ordinance 1853, adopted in January 18, 1994 by the Nevada County Board of Supervisors, to the M1-ME zoning district allows for a major intensification of uses and environmental impacts, not consistent with the zoning district, or the rules of interpretation of the Zoning Ordinance.

Ordinance 1853 is specific as to uses allowed within the district, listing uses, noise, air pollution("1. The use of any materials subject to becoming airborne shall only be permitted if it is demonstrated that no significant air pollution will result. 2. Refuse burning shall be permitted. 3. Any odors which interfere with the comfort of the adjacent residential uses and/or workers on site shall be prohibited).", hazardous materials, circulation, lighting, landscaping requirements, etc. The SP application to the M1 zoning clearly acknowledged that the adjacent residential uses were to be protected from heavy industrial use.

Section L-II 1.4, Rules of Interpretation

D. Zoning District Land Use Interpretation. If a proposed use of land is not listed in Article 2 (Zoning Districts), the Planning Director may determine the use to be allowable if the Director finds the use will:

1. *Be consistent with the goals, objectives, and policies of the Nevada County General Plan; and*
2. *Meet the purpose and intent of the zoning district that is applied to the site; and*
3. *Share characteristics common with those listed in the district and not be of greater intensity or density, generate greater impact on public facilities and services, or generate more environmental impact than the uses listed in the district; and*
4. *Be treated in the same manner as the listed use including determining where it is allowed, what permits are required, and what standards affect its establishment.*

Further the Zoning Ordinance requires that:

Determinations that specific unlisted uses are equivalent to listed uses will be recorded by the Planning Department, and will be incorporated into the ordinance when amendments to the ordinance are next considered.

And allows for a public hearing:

The Planning Director may forward questions concerning equivalent uses directly to the Planning Commission for determination at a public hearing.

And an **Appeal** process available to the public:
Section L-II 1.4, E. Appeal. Any determination or interpretation by the Planning Director may be appealed to the Board of Supervisors consistent with Article 5 of this Chapter.

This information needs to be discussed and included in the Land Use section of a revised Draft EIR available for public comment.

Transportation

The application package for the proposed reopening of the mine submitted to Nevada County suggested that the additional 69 years of mine waste would be sold off site for local projects. The Draft EIR proposes that the mine "engineered fill" be distributed throughout various local counties after the first 11 years in which the Brunswick and Centennial sites will be filled, and the fill must be transported somewhere else.

Ind 767-4

Page 9, II.3.a. Heavy Truck Vehicle Miles Traveled, KDAnderson, Traffic Impact analysis, states:
Heavy trucks can be included in VMT analysis for convenience, but are not the subject of the new CEQA requirement. In this case, inclusion of heavy trucks would not be convenient and rather would make the EIR's traffic analysis confusing.

The Draft EIR must be revised to include impacts from heavy trucks and include impacts to Hwy 49, including noise from "Jake breaks." Inconvenience is not a CEQA related reason to omit necessary traffic analysis. Please include this analysis in a Revised Draft EIR.

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DEIR page 21:
Trucks would transport barren rock from the Brunswick Industrial Site to the Centennial Industrial Site or Brunswick Industrial Site engineered fill areas. Transport of barren rock to the Centennial Industrial Site would occur 16 hours per day, seven days per week. An approximately 44-acre area of the 56-acre Centennial Industrial Site would be filled using engineered fill from the Brunswick Industrial Site over approximately five years. Engineered fill would be hauled to either the Centennial site or to off-site construction sites and mining concentrate would be shipped off- site via State Route (SR) 49.

The project needs to include full estimated analysis beyond the first 11 years. Traffic impacts to the County and Hwy 49, Hwy 174, and Hwy 20 need to be included in the analysis. Guessing that 69 years of "engineered fill" will be able to be sold off site to other projects leaves the CEQA analysis incomplete.This needs to be further analyzed in a revised Draft EIR.

Hydrology and Hydraulic Calculations, Nevada City Engineering, Vol IX, AppendixK-5

Pages 4-9. Calculations and runoff coefficients used for the analysis make no sense here. The "engineered fill" a both sites must be compacted to Urban Use Standards pursuant to SMARA.

Ind 767-5

The coefficients in a standard Rational Method of calculating runoff requires 0.9 be used for roofing and pavement, gravel pavement 0.85 (which may be the valid value for the engineered fill piles), side slopes, earth (prior to revegetation) 0.60, side slopes turf 0.30, etc. Coefficients used in the evaluation of post project runoff do not account for roofing, compacted engineered fill, roadways, etc.

It is impossible for the proposed Post-project to have less runoff than the Pre-project. These calculations are part of the Reclamation Plan as well as the proposed operational plan. This information needs to be recalculated and included in the text and mapping of the DEIR, in a revised Draft EIR for public review for both the Pre-project and the Post project estimates for the proposed Drainage Plans.

Ind 767-6

Detention Study, Nevada City Engineering: *On-site fills are proposed to be constructed at a slope ratio of 3:1. Under this scenario, due to the relatively mild gradient, mid slope benches will not be required. Where slope banks are great enough in height to require mid-slope interceptor ditches, "J" Ditches as indicated on the detail included on Page 14 of this study will be provided. These will eliminate any likelihood of erosion occurring on the slope faces. Additionally, the 3:1 slopes have a softer, more natural look which will make the proposed ultimate development of the engineered fill areas into industrial parks more aesthetically pleasing than benched slopes. These flatter slopes will also enhance the viability of landscaping and vegetative efforts on those slopes.*

Please provide calculations and verification that slopes are stable. Additionally the DEIR states that vegetative grasses will not need irrigation and they

4 of 5

will need irrigation. This information would be included in a Revised Draft EIR, Reclamation plan, and water estimates.

Improvement Plan proposed as Mitigation

Page 2-86 of the DEIR Impact 4.8-3 states *"As part of the Improvement Plan submittal process, the applicant call submit a Final Drainage Report to the County Planning Department for review and approval. The Final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity. The report shall address the Centennial and Brunswick Industrial Sites, prepared by a Registered Civil Engineer, and shall, at a minimum include: narrative describing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements to accommodate flows from this project, including treated mine water and mine water discharge and stormwater runoff. The Final Drainage Report shall demonstrate the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post development will not exceed predevelopment levels in the downstream channel(s) during design storm events.*

Ind 767-7

The requirement that the applicant adopt mitigation measures recommended in a future study is in direct conflict with the guidelines implementing CEQA. CEQA's mandates that significant environmental impacts and feasible mitigation measures be meaningfully analyzed prior to project approval. This information should be completed now and included in a Revised Draft EIR.

Ind 767-8

Further, PRC 2773(a), and (b)(4) require that "The Reclamation Plan shall establish site specific sediment and erosion control criteria for monitoring compliance with the reclamation plan." It is unclear as to when the County intends to complete the CEQA review of the Reclamation Plan, but this information should be included as part of the Reclamation Plan for public review.

Ind 767-9

First and foremost CEQA requires a public friendly environmental document. It appears that much has been done to make the review of this document difficult for the public to review and understand. This document is overly lengthy and confusing for the reader. Please edit and resubmit as a revised Draft EIR.

Sincerely,

Suzanne Smith
PO Box 2176
Nevada City, CA 95959

INDIVIDUAL LETTER 767: SUZANNE SMITH

Response to Comment Ind 767-1

The commenter states that the DEIR does not fully analyze the reclamation plan, but does not explain its assertion that the DEIR's analysis of the reclamation plan is inadequate. This is an introductory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1.

Response to Comment Ind 767-2

Comment noted. Please see Master Response 1 - Non-EIR/ Administrative Issues regarding quality of life concerns. DEIR Chapter 4.9, Land Use and Population and Housing, addresses potential project conflicts with applicable County General Plan land use goals and policies and zoning code requirements, and concludes that the project would be generally consistent with County policies.

Response to Comment Ind 767-3

Please see Master Response 1 - Non-EIR/ Administrative Issues regarding quality of life concerns. DEIR section 4.9.2 identified the applicability of Nevada County Ordinance No. 1853 creating the SP zoning district and that the Brunswick Industrial Site was designated M1-SP (see Table 4.9-2 and Figure 4.9-2). As discussed in the DEIR Project Description, section 3.8, the applicant has requested a rezone to the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME). As a result, the DEIR does not analyze the project's consistency with the SP zoning district and sufficient detail was provided to inform reviewers of the site's existing zoning and requested amendment.

Response to Comment Ind 767-4

The commenter asserts that transportation of engineered fill to supply local and regional markets was not analyzed in the DEIR; however, this activity and its associated impacts were analyzed in the DEIR. As described in Chapter 3.0 of the DEIR, the project proposes placement of engineered fill at both the Centennial and Brunswick Industrial Sites over the course of 11 years. After completion of engineered fill placement at the project site, engineered fill would be transported offsite and supplied to construction aggregates market. As described in DEIR Project Description section 3.7, a maximum of 2,000 tons per a day of engineered fill could be transported offsite. This would result in an average of 50 round trip truck trips, or a maximum of 100 round-trip truck trips, per a day of engineered fill. Hauling of engineered fill (barren rock and sand tailings) would shift entirely to be utilized in local and regional construction markets.

This aspect of the project was analyzed in numerous portions of the DEIR including traffic, air quality, greenhouse gases, and noise. As discussed in DEIR Chapter 4.12, Traffic (subsection 4.12.4), engineered fill assumptions consistent with the volume outlined above was analyzed as project trip generation (see Table 4.12-7). The DEIR analyzed project trip generation contributions to both existing plus approved project conditions and year 2035 cumulative conditions. Analysis included 24 intersections, including intersections along State Route 174, State Route 49, and within the City of Grass Valley.

Regarding truck traffic noise and the use of jake brakes, DEIR Chapter 4.10, Noise and Vibration, analyzed the trucks trips potential impact to increase noise levels along the haul route. As determined in DEIR Impact 4.10-2, haul truck vehicle noise would not substantially increase noise levels at the nearest residences along the haul route (see Table 4.10-15) except:

> *"However, it should be noted that the results presented above do not account for the use of jake brakes. In the event that jake brakes are used by project haul trucks operating between the Brunswick and Centennial Industrial Sites, the potential exists that a substantial increase in ambient noise levels could result from the project at the sensitive receptors located along that haul route." (Draft EIR page 4.10-35)*

As a result, the DEIR provided Mitigation Measure 4.10-2 which requires:

> *4.10-2 Haul truck operators shall be required to operate their trucks in such a manner so as to not require the use of jake brakes along the project haul routes. The Project Applicant shall post signage at the exits of both the Centennial Industrial Site and Brunswick Industrial Site informing drivers that the use of jake brakes is not permitted. Additionally, drivers directly employed by the Project Applicant, as well as any contract drivers, shall be required to abstain from use of jake brakes as a company policy. Proof of sign postage (e.g., photographic documentation) and a copy of the company policy language shall be provided to the Nevada County Planning Department prior to commencement of hauling. In the event that jake brake usage associated with project-related heavy truck traffic is observed, the Project Applicant shall implement additional measures to educate drivers regarding the safe operation of their vehicles without the use of jake brakes or take disciplinary action, if required, to the satisfaction of the Nevada County Planning Department. In addition, haul trucks shall be fitted with broad-band "growler" type back-up warning devices rather than the conventional "beeper" devices.*

As demonstrated above, engineered fill truck trip generation and the use of jake brakes was analyzed in the DEIR.

Response to Comment Ind 767-5

The Surface Mine and Reclamation Act section 3704(a), Performance Standards for Backfilling, Regrading, Slope Stability, and Recontouring, states:

> Where backfilling is proposed for urban uses (e.g., roads, building sites, or other improvements sensitive to settlement), the fill material shall be compacted in accordance with the Uniform Building Code, published by the International Conference of Building Officials and as adopted by the lead agency, the local grading ordinance, or other methods approved by the lead agency as appropriate for the approved end use.

As stated in Appendix K.5, hydrologic calculations were developed utilizing the unit hydrograph method. The coefficients for Rational Method supplied by the commenter are not applicable to the analysis of the post-project drainage in the project area because the rational method was not used. As stated in Appendix K.5, the hydrologic calculations and detention studies for both sites anticipate runoff at full development. Therefore, when mining operations are completed, all potential increases in runoff due to increases in impervious surfaces (pavement and buildings) will already be accounted for.

The rational method is only used to confirm the sizing of two culverts for the project as shown in bullets 6 and 7 on pages 7 and 8 of Appendix K.5. A Coefficient of Runoff for use in the Rational Formula (C) is calculated in order to determine the required size of Drainage culverts for subarea A-2 and B-3. In accordance with the Nevada County Land Use and Development Code Sec L-XVIII 5.1 (B), the runoff coefficient shall be determined using Standard Drawing D-15. Subarea A-2 is the off-site area of unimproved forested land and industrial land that drains towards an existing culvert that directs water onto the Centennial site (see figure H-2 of Appendix K.5). Subarea B-3 is the off-site area of sparse residential development and forest that drains towards

the existing 48-inch culvert on Brunswick Road (see figure H-4 of Appendix K.5). The calculation sums factors in accordance with the table for estimating "C" in Rational Formula for unimproved areas presented in Standard Drawing D-15. Appropriate and conservative C factors were used to confirm the sizing of these two culverts.

https://www.nevadacountyca.gov/DocumentCenter/View/6277/Nevada-County-Standard-Road-Drawings-PDF?bidId=

The commenter states that it is impossible for post-project conditions to have less runoff than pre-project conditions. However, as discussed in the DEIR, the project uses storm water detention basins to reduce peak flow in streams during storms below pre-project levels. The design and calculations for the storm water detention ponds are shown in the DEIR.

Response to Comment Ind 767-6

The commenter asserts that the DEIR needs to provide calculations that prove the fill slopes will be stable; however, calculations on fill slope stability are provide in Appendix H.1. The fill slope design of 3:1 (30%) is significantly shallower than the maximum of 2:1 (horizontal : vertical) recommended by NV5 in the Geotechnical Report (see Section 5.1.9 of Appendix H.1).

The commenter also asserts that the vegetative grasses proposed for the project site will require irrigation, which should be analyzed in a revised DEIR. As discussed in Section 5.8.1 of the Reclamation Plan (Appendix C of the DEIR), the hydroseed mix proposed is consistent with erosion control seed mixes used by Caltrans and County Public Works in the surrounding area. Irrigation will be used as necessary to support revegetation. If irrigation is required, revegetation will be shown to be self-sustaining for two-years prior to release of the financial assurance cost estimate.

As stated on page 9 of the water supply assessment (Appendix N), because the WSA is assessing the impacts at buildout of the proposed project, the water demand during construction (including any irrigation to support revegetation) is not included in buildout water demands.

Response to Comment Ind 767-7

A Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows." (DEIR page 4.8-75)

Despite this conclusion, the DEIR conservatively concluded a potential significant impact due to "regulatory compliance"; specifically, the County requires a final drainage analysis be approved by County Public Works prior to development. The DEIR provides sufficient information to inform a reader on the potential environmental issue and associated impact and provide a meaningful opportunity to comment.

Response to Comment Ind 767-8

As provided in DEIR section 3.8, Requested Discretionary Actions, the Reclamation Plan will be considered for approval in conjunction with the Use Permit for the project.

The Reclamation Plan, included as Appendix C to the DEIR, addresses the requirements of PRC 2773(a) in sections 5.3, 5.5, 5.8, and 5.10. In addition, Appendix G of the Reclamation Plan includes the Nevada City Engineering Preliminary Drainage Analysis providing stormwater flows and capture calculations for the reclaimed condition of the site.

As discussed in the sections outlined above, and Appendix G, the project and Reclamation Plan includes the use of culverts, drainage swales, detention basins, revegetation, and other means to control onsite erosion. Section 5.8.4 of Appendix C describes revegetation success criteria and Section 5.8.5 describes monitoring and maintenance of revegetated areas. Grading, drainage and erosions control are discussed in Section 5.5.

Response to Comment Ind 767-9

The commenter asserts that the DEIR is overly long and confusing. The DEIR is the length necessary to address the environmental impacts associated with the project, and those raised by the public. This comment does not address an environmental issue associated with the project, but has been forwarded to the decisionmakers for their consideration.

Individual Letter 768

From: Suzi Kerston <suzi@suzikerston.com>
Sent: Monday, April 4, 2022 1:25 PM
To: Matt Kelley
Cc: Suzi Kerston
Subject: RE: March 24, 2022 Special Planning Commission Meeting

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Ind 768-1

Matt:
Here are my questions concerning the mine:
Why did the TCSC stop the retesting of the Idaho Mary toxic investigation when Rise Gold arrived?
How specifically are they going to manage the Arsenic and Asbestos once it is airborne and in the water?
How are they going to manage the Fog Plume and green house affects?
Who is going to make them accountable for the noise levels that were grossly understated in the EIR?
Thank you
Suzi Kerston
530-305-3312

From: Matt Kelley <Matt.Kelley@co.nevada.ca.us>
Sent: Thursday, March 24, 2022 6:43 AM
To: Suzi Kerston <suzi@suzikerston.com>
Subject: March 24, 2022 Special Planning Commission Meeting

Good Morning Suzi:

Thank you, I have received your voicemail message. The Special Meeting of the Nevada County Planning Commission is scheduled to take place from inside the Board of Supervisors Chambers with the meeting being open to in-person attendance. All verbal public and agency comments on the adequacy of the Draft EIR will need to be made in-person at the meeting. The meeting will be broadcast live on Nevada County Media Channel 17 in Western Nevada County and on Suddenlink Channel 78 in Eastern Nevada County. The meeting can also be viewed live through the web at: http://nevco.granicus.com/ViewPublisher.php?view_id=19. Below is a link to the Planning Commission Agenda along with a link to the Notice of Availability.

March 24, 2022 – Special Meeting of the Nevada County Planning Commission Agenda
https://www.mynevadacounty.com/AgendaCenter/ViewFile/Agenda/_03242022-1383

Notice of Availability to provide comments on the Idaho-Maryland Mine Project EIR
https://www.mynevadacounty.com/DocumentCenter/View/42256/NOA-Comment-Period-Extension-Final

Idaho-Maryland Mine – Rise Grass Valley Project Website
https://www.mynevadacounty.com/3195/Idaho-Maryland-Mine---Rise-Grass-Valley

Thank you Suzi, and if you have any additional questions, please let me know.

1

Matt Kelley
Senior Planner

Planning Department
County of Nevada
Community Development Agency

950 Maidu Ave, Suite 170
PO Box 599002
Nevada City, CA 95959-7902

office 530 265-1423
https://www.mynevadacounty.com/512/Planning-Department

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I am out of the office every other Friday as follows: 1/7, 1/21, 2/4, 2/18, 3/4....

PLANNING PUBLIC COUNTER NOTICE

The Customer Service Counter for Nevada County CDA - Planning Department is open from 8:00am – 3:30pm for new application submittals and appointments. Walk-ins are welcome from 8am to 5pm. To schedule an appointment with staff please contact the Planning Department at 530-265-1222, Option 2 or planning@co.nevada.ca.us. If you have any questions about our services, please contact us by email at planning@co.nevada.ca.us or by phone at 530-265-1222 Option 2.

INDIVIDUAL LETTER 768: SUZI KERSTON

Response to Comment Ind 768-1

The commenter's reference to TCSC is unclear. Arsenic and asbestos are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. For the commenter's fog plume reference, please see Response to Comment Grp 7-95. Greenhouse gas effects are addressed in Chapter 4.3; please also see Master Response 27 – Greenhouse Gas Thresholds and Master Response 28 – Greenhouse Gas Credits.

Matt Kelley
Senior Planner, Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-7902
April 4, 2022

Subject: Comments on Rise Gold Idaho Maryland Mine DEIR

Dear Mr. Kelley:

I am writing to express my dismay over the inadequate and flawed draft environmental impact report prepared for the Rise Gold Idaho-Maryland Mine project.

I attended the special planning commission meeting on March 24, 2022 and was very impressed with the depth of analysis and civic community engagement on display that day. While I have little to add to the record over and above the analysis and comments prepared by the public and agencies, I would like to add my concerns over several specific issues:

Empire Mine State Historic Park is set aside for the public to enjoy and appreciate, and learn from. The park has experienced ongoing issues inherited from legacy mining impacts, and even with the relatively deep pockets of the state, and the commitment to improving environmental conditions, those negative impacts associated with water, toxic chemicals (arsenic, mercury), subsidence and collapse remain today, long after the active mining pursuits have been curtailed. The proposed project would have significant and unavoidable impacts to the park, from underground plumbing effects, to noise and aesthetics. Groundwater and surface water are inextricably linked, and the subsurface complex geology of fractures and faults render the transport paths of fluids in unpredictable ways.

Ind 769-1

The very thought of an active industrial mine surrounded by quiet parks, and residential areas is an abhorrent one. The zoning of the two sites should prohibit even the prospect of the project as untenable.

The county's general plan and zoning should be relied upon to be consistent and any thoughts to change to mining extraction would devalue the surrounding properties significantly.

The huge engineered fills would tower above the surrounding terrain. The visual impact would be astonishing, and the unconsolidated materials would be subject to erosion and movement, eventually impacting Wolf Creek.

Since the Centennial site has yet to be cleaned up under a separate DTSC project, future use and additional negative impacts to this location are yet to be resolved.

Ind 769-2

Ind 769-3

Unfortunately our community has experienced multiple cycles of gold mine re-activation proposals, and failed enterprises due to inadequate planning, execution and management.
Our community is steeped in gold mining history and legacy impacts we continue to struggle with. While the mining activities soften with time and through the lens of nostalgia, modern techniques are at odds with an economy based on tourism and environmental quality.
I strongly recommend that the Planning Commission make the determination that the proposed project is a non-starter, and save our community the additional time and expense to carry forward additional oppositions to a project virtually no one wants, save for the gold-fevered investors and the Rise Gold principals.
So, no to the re-zone request, no to the use permit, and no to any variance requests. With these noes in hand, hopefully the project can be abandoned, for all time.
Sincerely,
Syd Brown
14124 Honeysuckle Way
Nevada City, CA 95959
sydneylloydbrown@gmail.com

INDIVIDUAL LETTER 769: SYD BROWN (1)

Response to Comment Ind 769-1

The commenter expresses concerns regarding the project's adverse effects on Empire Mine State Park, which are addressed in the responses to Agency Letter 1. Agency Letter 1 is authored by the California Department of Parks and Recreation. For concerns related to engineered fill piles, please see Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 769-2

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 769-3

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Response 1. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 770

From: Syd Brown <sydneylloydbrown@gmail.com>
Sent: Tuesday, February 1, 2022 4:05 PM
To: Idaho MMEIR
Subject: Requesting extension of comment period for Idaho Maryland Mine DEIR

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Ind 770-1

I request that Nevada County extend the comment period for the Idaho Maryland DEIR. The 60 day comment period is insufficient to review and analyze the complex aspects of this project. Please provide the necessary time to enable thoughtful and accurate evaluations of the potential impacts associated with the proposed project. With the power and internet outages from the storm still wreaking havoc in the county, and the limitations to in-person library access, extending the comment period seems to be only reasonable.
Thank you.
(Ms.) Syd Brown
she/her
530.205.7068

1

INDIVIDUAL LETTER 770: SYD BROWN (2)

Response to Comment Ind 770-1

Please see Master Response 1. With regard to the public comment period for the DEIR, the comment period lasted for 91 days, starting on January 4, 2022 and ending on April 4, 2022.

Individual Letter 771

From: Sylvia Otton
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Thursday, February 17, 2022 10:00:47 AM

Cannot identify Dist

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Ind 771-1

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine.

My family moved to Nevada County from Southern California 20+ years ago to enjoy a cleaner, quieter life. We own a home, eat, shop, recreate, and plan to retire here. The Mine is detrimental to our quality of life and will cause many of your constituents to leave the County.

Bad idea, Sups!

Thank you for your time.

INDIVIDUAL LETTER 771: SYLVIA OTTON

Response to Comment Ind 771-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Quality of life concerns are outside the scope of CEQA. Please see Master Response 1.

Individual Letter 772

From: Tamara Snyder
To: bdofsupervisors
Subject: No on mine
Date: Thursday, February 17, 2022 9:20:07 PM

Dist 1

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Ind 772-1

Please vote NO on the mine project in our town. We don't need anymore negative environmental issues to deal with. My health and our children's current and future health is far more important than money. Greed cannot win!

Let your conscious be your guide. Vote NO on mining in our neighborhood.

Sincerely,
Tamara Snyder

Sent from my iPad

INDIVIDUAL LETTER 772: TAMARA SNYDER

Response to Comment Ind 772-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 773

Matt Kelley,
Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 94959-8617

Mr. Kelley:

Please add my name and company to the ranks of supporters of re-opening the Idaho-Maryland mine – an essential project for the future of Nevada County and our local businesses.

I have worked with the team at Rise Grass Valley, and I have confidence in their plan to bring a vibrant new business to our community. The time that they were here, it boosted my business and numerous others. Rise Gold predicts creating 312 new jobs in our county in an era where working families are suffering more and more from low wages and high unemployment.

Ind 773-1

Rise Gold is offering ON AVERAGE $94,000 in wages for these positions – almost $50,000 more annually that the current average wage in the county. This doesn't even count the much more significant potential of 4.7 indirect jobs created for every one job Rise creates directly. My business and scores of others will be lifted by this project, allowing us to have greater security and offer a brighter future to our own employees Passing up this opportunity to build a state-of-the-art clean mining operation right here in Grass Valley would be a foolish mistake.

I urge the Board of Supervisors and Planning Commission to avoid the baseless and desperate attacks from extreme anti-business voices in our community and approve this project so that Nevada County can build for a more prosperous future.

Sincerely,

Tammy McCrary, Owner
Foster and Son Hose and Fittings
780 Whispering Pines Lane
Grass Valley, CA 95945

INDIVIDUAL LETTER 773: TAMMY MCCRARY

Response to Comment Ind 773-1

The commenter's support for the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 774

From: Tandra Webb <wtandra1@gmail.com>
Sent: Monday, April 4, 2022 1:07 PM
To: Idaho MMEIR
Subject: No mine

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Ind 774-1

In my opinion the mine will have horrific consequences on this community/wildlife. And all over greed. The future of this town will become lost. And eventually a ghost town as it will become unlivable due to the destruction that will be caused within time. Do not re open the mine it will destroy this community and wildlife. This company will say whatever to get it open. And lie. They are dirty. And are only about greed and not the welfare of life. Itself.
Sent from my iPhone

INDIVIDUAL LETTER 774: TANDRA WEBB

Response to Comment Ind 774-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project, which has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Regarding the commenter's generally noted concerns about project effects on wildlife, please see Chapter 4.4, Biological Resources.

Individual Letter 775

April 4, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

email:idaho.MMEIR@co.nevada.ca.us

To the Nevada County Board of Supervisors,

I write as a concerned 35-year resident of Nevada County, a retired University of California history professor (Ph.D. UCLA in U.S. History, 1987), and active member of Nevada County Historical Society.[1] My most recent book is The Nevada City Nisenan (2022). My father resided Atria Grass Valley at 150 Sutton Way until his death in 2016. The impacted area and its various businesses and roads are very familiar to me.

Ind 775-1

Having read the **entire** EIR, **I strongly oppose reopening the Idaho-Maryland Mine.** The draft EIR is misleading in its manipulative selectivity and its omissions, creating a false impression of the relative harmlessness of the mine's dire impacts. Far more scientific research is necessary to protect the environment: the mitigations proposed are far from adequate. I respectfully offer my two part analysis of why approval is a grave mistake for this county:

Part I: Environmental/Quantitative: Of 83 identified impacts, 30 were deemed "significant and only 3 found "unavoidable." I find the analyses of those mine opponents with scientific expertise in the community, such as the CEA, persuasive: that baseline studies on air and water are not current, groundwater models faulty, and mitigations insufficient. That County residents should be subject to **any** increase in traffic, **any** deterioration in air or water quality, or **any** dangers from potential accidents is **unacceptable**. My questions and comments are directed at my primary concerns.

Ind 775-2

I. Insufficient research on wind patterns: No where in this EIR is a scientific analysis of wind patterns in the impacted area. Such in-depth study is necessary given the mortal danger of windblown pollutants like asbestos dust. Rise Gold acknowledges this hazard and offers to mitigate by drawing on NID water to tamp down the dust. **Addressing one problem by creating another (a huge draw on water in a mega-drought) is not a viable solution**: it is a double environmental hit on our air and water. Given the grave severity of air-borne pollutants, Rise Gold should be required to do much more investigation and explication and mitigation than they currently offer. There are, as I understand it, two sources of airborne contaminants: dried mud from the dewatered mine [2] and asbestos-laden mine-rock brought to the surface in stupendous volumes. I should like to know more about the process of monitoring and containing such pollutants. Finally, as a known pattern of climate warming

Ind 775-3

[1] tanisthorne.com The book includes a chapter on mining by Hank Meals.
[2] "The water coming from these mines [after dewatering] that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever." Quoted in the Atlantic, Jan. 30, 2022.

we currently experiencing (such as the winter storm of December 2021) is increasingly erratic and intense weather events,[3] worst-case scenerios for wind events should be anticipated, not the best case scenerios anticipated in the EIR. The erection of wind barriers around the areas where mine rock at industrial sites, addresses only one small phase where such fibers could escape into the air. Rise Gold should be required to more than a "half-baked" analysis. The mitigations offered are inadequate.

Ind 775-4

II. How often will the mine rock be tested for dangerous contaminants before piled up at the industrial sites or loaded on trucks? How will asbestos-laden rock be segregated from other waste rock? How will contaminated rock be treated? Who will do the monitoriing and who will pay? Then, there is the rather serious issue, which the MEIR does not address of long-term leakage and wind-borne contamination in the "recuperated zones" of so-called "engineered" mine rock **The mitigation proposed** (as above) **which creates yet another "significant and unavoidable" aesthetic impact** —and more frighteningly a legacy of poison for our descendants—**is unacceptable**: viz. mine rock disposal creating 165-foot tall towers. (Likewise, the "solution" to disposal of mine rock exported by trucks, creates at least two "unmitagatable" impacts.)

Ind 775-5

III. Insufficient research on contaminants entering the South Fork watershed. Given the danger not only to County residents and biotic environment, but potentially millions more lifeforms living downstream to the Delta and beyond, there needs to be more pre-testing, monitoring by 3rd parties and more precautionary measures in place in the event of storm events (627) Once water from the dewatered mine be brought to the surface, County residents have a right to know what contaminants are in the water, and how treated, and what the chemical analysis is prior to being released into the South Fork. New testing should be done to test water quality now. Again, worst-case scenerios should be anticipated—an extreme flood event—to prevent overflow of contaminated, untreated water from the catchment ponds into the river. The mitigations, while offering some protections against flood events (628) are inadequate (699). Rise Gold should be required to pay the Wolf Creek Alliance or other independent 3rd party for regular monitoring.

Ind 775-6

IV. Unprecedented historic drought conditions have altered conditions, requiring recalibration of the water use projections deemed "insignificant. 42,000 gpd for dust suppression for 6 years may we more than NID can spare. Already, according to Section 11.5, the demand expected to exceed supply in dry years. (840) The mitigation proposed is that additional water could be supplied from the Bear River drainage has no realistic basis. California has mandated water conservation and water is over-allocated everywhere—in other words there are far more stakeholders promised water than there is water.[4] A more accurate hydrologic model is needed to address concerns about groundwater impacts for all well owners in the impacted area, whose concerns have been slighted. EmGold acknowledged the potential threat to well-owners was more serious and widespread. Rise Gold has underestimated the threat to well owners.

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[3] "How Bad Is the Western Drought? Worst in 12 Centuries, Study Finds."Fueled by climate change, the drought that started in 2000 is now the driest two decades since 800 A.D." By Henry Fountain, *NY Times,* Feb. 14, 2022 https://www.nytimes.com/2022/02/14/climate/western-drought-megadrought.html

[4] "In California, rights to water exceed the supply," by George Skelton, *LA Times Capitol Journal:,* April 12, 2015 https://www.latimes.com/local/politics/la-me-cap-drought-water-20150413-column.html

Ind 775-7

V. Greenhouse Gas emissions underestimated. Rise Gold acknowledges mining operations will be emitting a huge amount - 9000 metric tons per year – but this does account the additional 4000 related to cement manufacturing, that would be well over the 10,000 metric ton significance threshold.

Ind 775-8

VI. Skewing of Data: Omitted from the report is 1) a complete scientific analysis of the clean-up of the Centennial Industrial Site (CIS), construed as a "separate," but actually an integral part of the mine-reopening project;; and 2) In the Transportation section (pp.: 903-906) the VMTs from heavy trucks, is excluded, as it was not strictly "required". (This is a loophole big enough to drive 118 heavily laden trucks—236 roundtrips—through a day for 80 years.) This leads to underestimates in the negative biological, traffic and noise impacts. Regarding the Centennial Industrial Site (CIS) there is great inconsistency and confusion generated by referring to the clean up there as "Voluntary" (587), thus underplaying the seriousness of the pollution there as one of the nation's top Superfund sites. The EIR repeatedly says this is the company's primary place for dumping mine rock (e.g. 4.3-50, 4.3-11, 4.3-55, 4.3-19) and bases various scientific analyses and calculations upon this "anticipated" chronology (104, 175, 767) when in fact Rise Gold has delayed beginning the clean-up at CIS. These two elements need to be included to get a truly accurate assessment of environmental impacts.

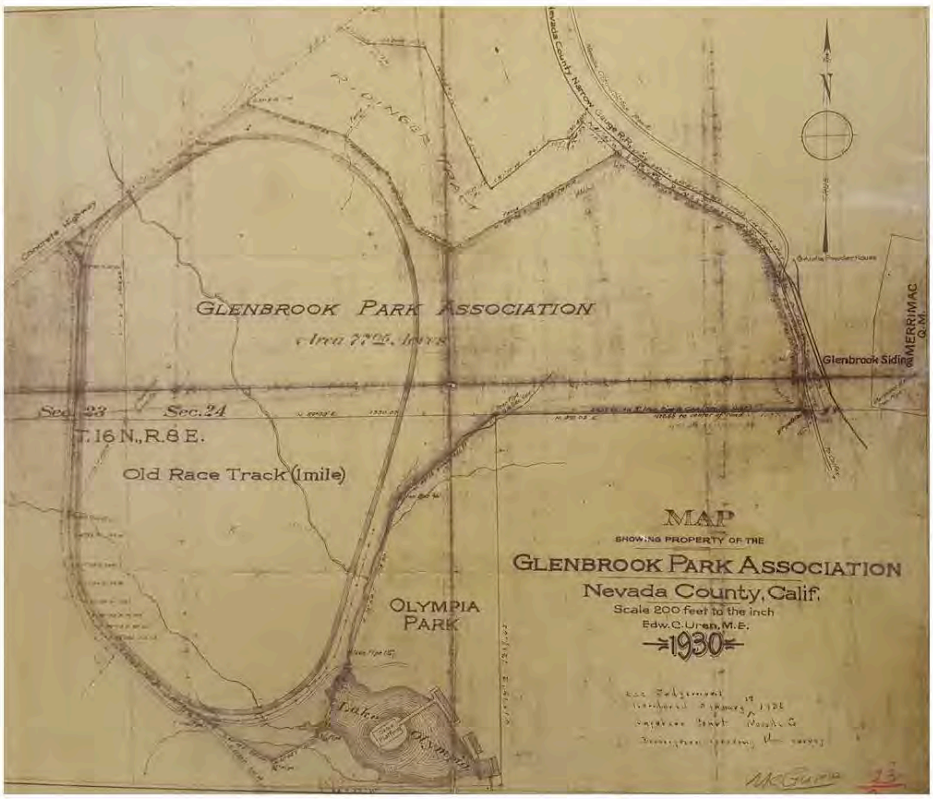
Ind 775-9

Part 2: A historical-cultural perspective. From a historical-cultural perspective, the draft EIR and the project documents are seriously deficient, specifically in Section 4.5 of the report (Cultural and Tribal Resources). On page 1028 [Section 6.3], the report claims that quantitative and in some cases qualitative evidence has been consulted for each impact, but this is a gross distortion: Rise Gold and its consultants wants to make the entire problem quantitative (and presumably fixable) while ignoring the qualitative effects on the region.

Omission: County History, Culture, and Native Americans: The Impacted Area as a Major County Transportation Hub: These are are significant omissions: 1) Two and possibly three Nisenan settlements were in the impact area: Yol si an, Dam im luk, and Si po ny, the last had a large roundhouse and graveyard.[5] These sites were recorded in 1928 by anthropologist Hugh Littlejohn from information acquired from Nevada City and Colfax Indian consultants. Bedrock

[5] Hugh W. Littlejohn field notes on Southern Maidu (Nisenan), 1928, p. 39. Online Archive of California; see also Shelley Covert's recent slide presentation for the Bear Yuba Land Trust.

mortars are located at the corner of Plaza and Sutton within the impact area. 2) There is no



mention of Lake Olympia or the Glenbrook Racetrack, both located in the Glenbrook Basin.

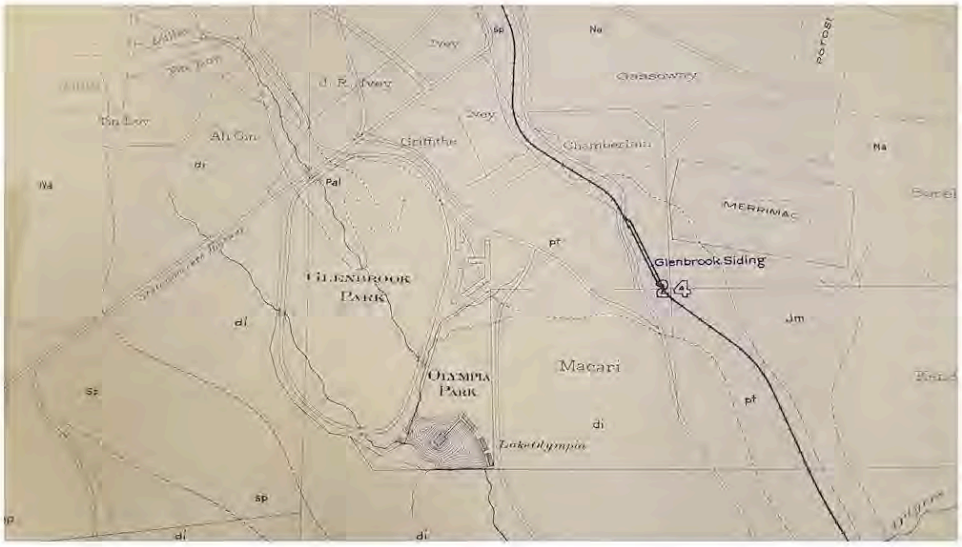
Map 1 (above, dated 1930) and Map 2 (below, dated 1924)[6] show the location of the race track and Lake Olympia (the last in the vicinity of the cinema at the junction of Plaza and Sutton). The Glenbrook Basin was registered as an important county landmark[7] in 1993, NEV 93-01.

Marker No. 59 is on Sutton Way, south of Brunswick Rd, next to bus shelter in the Glenbrook Plaza parking lot. The Idaho-Maryland mine's buildings were about a mile to the south.

This is the Landmarks Commission description of this historic site:

[6] Both maps are in the Searls Library.
[7] landmark defined as a loadstar, guide, beacon in German

5 of 12



"Early In the 1850's Glenbrook Basin first became known as the site of county fairs, horse racing and other special events. When Olympia Park, located at the south end of the basin, opened in 1901, Glenbrook Basin became the recreational center of Nevada County and much of Northern California, and remained so for over fifty years. People would come to the basin by horse and buggy or later the automobile, but those wishing for a little more excitement would often use the Nevada County Traction Company's trolley, or the Nevada County Narrow Gauge Railroad. The large grandstands of the three-quarter-mile racetrack stood near the junction of present Brunswick Road and Sutton Way. Trotting, pacing, and running horse races were held at the track, and motor car races began in 1913. The racetrack was one of the first electrically lighted racetracks in the state. A dam was constructed just northeast of the existing electrical substation to form Lake Olympia. The lake soon became one of the Basin's main attractions. Located in the center of Lake Olympia was an island with a pavilion which had a coil-spring-mounted dance floor that swayed with the rhythm of the dancers' feet. There was swimming, boating and fishing in Lake Olympia, and during some winters there was ice skating. There were boats and bathing suits for rent, and the park contained a bathhouse, a roller skating rink, and a bar. Many a romance blossomed on the lake during an evening boat ride under the stars. Families rented cabins and picnicked in the shade of the large pine trees along the shores of Lake Olympia. Olympia Park was the site of high school commencements, football and baseball games, and special events such as fat ladies' races and freckled-face children contests. The annual miners' picnics were held at the park with mucking and drilling contests, tug-of-wars and Cornish wrestling, as refreshments of various kinds flowed freely. Olympia Park fell into disrepair in the 1950s and ceased operation in 1958. **Glenbrook Basin,** once the recreational center for Nevada County, has **developed into one of the county's main centers of commerce** in supplying various types of

shopping, restaurants, services and recreation for the residents and visitors of Nevada County."[8]

Much abundant documentation exists for the cultural and historical importance of Glenbrook Basin as a recreational zone from 1850s to 1950s (See appendix 1).

A poorly planned hub: Subsequent to the closure of the Idaha-Maryland mine after World War I, Basin also ceased to be a recreational center. The basin was rezoned to promote light industry and commerce to promote economic growth. The 49/20 freeway came through in the 1960s when funds for highway improvement came through, bisecting the basin north/south as Brunswick Road had done a century before west/east. Lamentably, the automobile brought an end to the County's exceptionally-efficient and integrated mass transit system. As early as 1971, the poor planning of the area was acknowledged as "development gone awry." In fact, there had been no master plan, and one bad decisions one after another was made. The Basin was a hodgepodge of architectural styles, fast food joints, already facing traffic congestion. The water courses were paved over and the hillsides carved up. Names of streets and shopping malls retain the history of this past era, and there are some physical reminders as well, for example, some of the original tourist cabins along the Nevada City Highway, As one descends from Main Street to Sutton on Dorsey, the exhilerating, sweeping road curve follows the hoof-print of the defunct racetrack. Because of its **centrality in the County,** it nonetheless emerged as "Nevada County's most vital commercial area"[9] by the early 1990s.

Reopening the Idaho-Maryland will add yet another layer of damage to an already over-crowded badly planned road system, burdening it with bad air and heavy truck traffic. At the very least, as a mitigation Rise Gold should be required to pay for redesigning the bridge spanning the freeway and onramps to the freeway along Brunswick Road to create separate lanes for heavy truck use.

Ind 775-10

Evidence and lack of evidence of Indian occupation and its mediation: The EIR correctly observes that mining destroyed the cultural landscape of what existed prior to the gold rush. There are no registered archaeological sites in the Glenbrook Basin; indeed, there would not be as neither the United Auburn people, nor the Taylorsville Tsi Akim, nor the Nevada City Rancheria has jurisdiction in this area. The Rancheria has no legal standing as it is not federally-recognized and therefore had no voice in demanding or monitoring any archaeological project mandated under CEQA. The fact that there may be village sites, one with a graveyard, advises an abundance of caution. The EIR states (p. 6-26) that "the implementation of the proposed project could result in a **significant but mitigatable impact to unknown** archaeological resources and Tribal Cultural Resources." This is because disturbance of Central Hill Nisenan archaeological sites during construction is possible. The mitigation for such an eventuality is to follow established procedures by bringing in an archaeologist as consultant (4.5-2 and 4.6 ff; pp. 524-527). **This mitigation is inadequate.** How can one mitigate an unknown? The Native American Heritage Commission's Sacred Lands file preserves the record of only a tiny percentage of the places sacred to Native Californians. Heavy machinery used in construction and mining would obliterate any traces of artifacts or bones. **A mitigation by Rise Gold should**

[8] Excerpted from: David Comstock and Bernard Zimmerman. "Exploring Nevada County." Apple Books. "https://nevadacountylandmarks.files.wordpress.com/2017/05/glenbrook-basin.pdf

[9] *The Union* Nov. 29, 1991, p. 1.

include a full archaeological exploration and accompanying CRM (Cultural Resource Management Report with Native monitors). There should be sample testing at several places, especially in construction areas, prior to the project beginning. At the very least, , the area which has known bedrock mortars in the vicinity of Lake Olympia should be thoroughly investigated by professional archaeologists. This would serve the double-purpose of discovering possible remains from the Lake Olympia recreational site: foundations for buildings, etc.

Geo-physical and hydrological evidence suggest conditions were highly favorable for Indian village site(s) in the Glenbrook Basin. This is flat valley (first used by settlers for dairying) fed by numerous springs and creeks entering the basin from both the west and the east hillsides, thus creating meadows where a diversity of wildlife flourished, ideal for Nisenan seasonal and semi-permanent camp sites.[10] The first mention of the Glenbrook Basin in the historical early 1850s was wrestling and racing events, consistent with popular entertainments drawing miners and Indians as participants, such as those documented at Storm's Ranch in present-day Chicago Park and Bouvyer's Ranch on Deer Creek in 1850s. A racetrack at that site dates back to the mid-1850s. A marsh in the southeastern corner of the basin is where bedrock mortars have been identified.

Analysis: Rattling the Bones of Our Elders/Omitting County Culture and History as Irrelevant. Since there are few if any no-above ground physical remains, the point seems moot.[11] However, 1) Glenbrook Basin is a very significant place in Nevada County history, arguably the site of Nevada County's most glorious era from the 1880s to WWII when public transportation was king and environmentally-friendly: the electric tram and the narow gauge railroad linked Colfax, Nevada City, and Grass Valley. 2) More to the point: the Glenbrook Basin has always been a central place dating far back into pre-histoy. Historically, it is a hub of transportation, a major artery for Nevada County. The draft EIR report's failure to acknowledge our history and current needs—the importance of the basin for travel and trade, for residential occupation, and for housing our elderly— demonstrates an insensitive and callous indifference —or deliberate obfuscation —that is highly objectionable, and should not be allowed to pass withou comment. These omissions are deserving to note:

Ind 775-11

- No mention is made of the nursing homes and assisted living areas concentrated along Dorsey/Sutton: Atria, Spring Hill Manor, the Golden Empire, some of whom still drive to or walk or drive wheelchairs on newly installed sidewalks to Brunswick Basin shops. A demographic analysis of the impact area should have been included the dense concentration of the elderly here. The 2570 acre area in the Glenbrook Basin whose 73 miles of underground tunnels will be worked is an area where some of the most vulnerable County residents are concentrated: the homeless, and poorer, older, and ailing persons. A rise in ambient noise and light, seismic vibrations from explosions, construction and truck traffic, 16 hours a day, is inhumane.

Ind 775-12

[10] Geohub aAs defined by archaeologist Hank Meals, A meeting and living place based upon favorable topography where trails converge, connecting watersheds and ridges and offering access to territories of many groups," (Hank Meals). Places of abundant resources, adjacent to springs and/or wetlands favorable for trade, ceremonial events, and social transactions. See glossary, *Nevada City Nisenan.*

[11] but all that remained of I-M was a silo and a lot of mining pollution at CIP, yet it was on the Register of Historical Places.

- The tangible impacts to those above the tunnel area has been consistently underestimated.
- What the report fails to mention is that the reopened mine will do so much damage to a prosperous, stable, and high-functioning with light industry, businesses, and homes. Rural residents depend on the varied services here, e.g. banks, Verizon, well service, pharmacies, etc..
- Anyone that travels on Brunswick Road from the freeway to 174 knows how dangerous it already is and that it is far worse in bad weather. Imagine how intimidating it will be for the elders of our community to have to brave 14-ton trucks, some with explosives, when they venture out to shop or buy other supplies. Traffic accidents are inevitable.

Ind 775-13

Privileging the mining history in Section 4.5 of the report creates an illusion of continuity and disguises the profoundly aberrant nature of the proposal to reopening the I-M gold mine. We are in a post-industrial historic period. We are still remediating the damage to Native people and to the environment from the last epoch of mining. What is obvious to county residents is blithely swept aside in the report: the impact zone **at an intersection of 49/20 and the Brunswick Road to 174 to Colfax** is **a transformation hub** This is a "**central**" place on our landscape. Anyone who lives here knows the area is already congested and poorly planned, that Brunswick Road is dangerous, especially so in winter, and air quality already marginal and downright unhealthy during the fire season. A decline in property values is inevitable, especially for homes on Bennett Street and over the tunneling area. Property owners in this impact area were told by realtors as required by law that they were buying where underground mining rights were still active, but in a zone which banned heavy industry.. The residents of this area are the "new Indians" as history repeats itself. Homeowners, renters, and business owners—promised one thing—can continue to work and live in the mining area, but only at the cost of the destruction of their tranquility and the poisoning of lifeforms and/or total destruction of habit. No point in expecting or demanding compensation for losses; this is a one-way deal.

Conclusion: "Wherefore the future?" Rise Gold plays a double game, saying on the one hand, quality of life issues are "intangible," unmeasurable, and therefore unscientific and at same time the report claims brazenly that qualitative evidence has been incorporated for each impact. This is an untrue statement.[12] What we see here is a very slick strategy to "control the narrative" and thereby exclude information from the report that does not support their project about the how mining would ruin the peace,and quiet of rural life in this County.

Ind 775-14

1. **A Sustainable Future or Years of Seige?** What sureties/guarantees, permits, inspections could offset real as well as potential negative impacts and risks? The draft EIR attempts to apply all manner of technical fixes in service of corporate profit. This is one where we march forward into the past by attempting to reimpose an archaic industrial past on a post-industrial present. Nevada County is better than that. Over the last half-century, governmental laws and policies direct us towards better environmental practices: stewardship, conservation, checking the worst mistakes of the past, and implementation of technologies that reduce waste. We have mandates
    - to reduce automobile usage and greenhouse gas emissions

[12] 1 On page 1028 [Section 6.3], the report states that quantitative and in some cases qualitative evidence has been consulted for each impact.

- to encourage bicycle use (872, 976) and pedestrian traffic
- to reduce our electricity consumption and water consumption
- to improve the health of our forests
- to improve aesthetics by imposing building codes
- to clean up polluted areas and cease poisoning our rivers and creeks.

Approval of the Rise Gold's mining operations would require a number of code changes, one allowing unsightly, post-apocalyptic, 7-story high piles of mine rock, another returning Glenbrook Basin to an industrial rezoning. While engaging in stone-walling denial that degradation of the environment is "significant," the report shows degradation on multiple fronts. To rezone the Basin now, would be a betrayal to homeowners and just cause for litigation.[13] Approving the mine is going in the wrong direction. Nevada County Board of Supervisors should be leading us to a better future, not a worse one. We have a beautiful landscape, a growing population, and booming tourist industry. Why not show some character and vision, and put the mass back into transit, and make Nevada County a pioneer in implementing environmentally-friendly technologies? It was quite alarming to hear at the public hearing last Thursday at the Rood Center that Rise Gold 's use of electric power would gobble up most of the hard-won gains of electricity conservation. Consumers should not be asked to conserve so that foreign investors can profit. Economic benefits to County residents are chimerical; this propaganda should be exposed for what it is. Far more jobs and County property taxes will be created by projects that are approved or are reasonably foreseeable in the next five years (4.12-35, 4.12-43; pp. 886. 899)

Ind 775-15

Rise Gold, as many have pointed out, is not a reliable partner, and Ben Mossman is not credible. Canadian mining companies have a notorious record of making false promises and leaving environmental messes off-shore and within California itself in recent years,.[14] The Canadian Sonora Mining Company, for example, skipped town and left the taxpayers of California with a $30 million dollar clean up at the Jamestown Mine. Rise Gold has shown a willingness to make mitigations in Nevada County, but only when it is pressed to do so. In the course of this review process, some critics have suggested Rise Gold be required to put up sizable amounts of money to cover costs to individual well-owners or to the County. water issues/mining/region5 success stories/ia More numerous and regular and frequent site inspections or monitoring by objective, third parties could be required. I see these as ineffectual. **Could there ever be enough monitoring to ensure pollutants weren't entering the air or water.? How could we be exempt from freak accidents or meteorological events like windstorms or floods?** Realistically, as Robert Hubbard of the CEA and others have pointed out, once the mine is up and in operation and

[13] Tony Lauria, *Union*, March 7, 2022, A4; cf. https://www.waterboards.ca.gov/rwqcb5/
[14] For example, Canadian Mining in Latin America: Exploitation, Inconsistency, and Neglect June 11, 2014 COHABy Malavika Krishnan athttps://www.coha.org/canadian-mining-in-latin-america-exploitation-inconsistency-and-neglect/#:~:text=Canadian%20firms%20such%20as%20Barrick,the%20development%20stage%20%5B3%5D.

making profits for its non-resident investors, Rise Gold would simply pay penalties rather than cease operations and correct the violations. Worst comes to worse, tax payers are left with clean-up costs as they were at Jamestown mine. Personally, I would like to see test runs, as well as more scientific study. 14-ton trucks should run up and down Whispering Pines and Brunswick 16-hours a day to see if anyone notices increased noise or traffic congestion. As a sign of trustfulness and commitment to the well-being of our community, Rise Gold should first clean up the Centennial Industrial Site to community members satisfaction; then and only then will we consider reopening the Idaho-Maryland mine.

The real core of the problem, however, is this: **Rise Gold has put us on the defensive in our own land. Our safety depend on regular monitoring, honesty, and proper enforcement.** Hundreds and hundreds of hours by private citizens, environmental groups, and county government employees have already been expended to protect the status quo. (I have put in more than 200 hours working on this existential threat.), If approved, thousands more hours will be required to minimize the environmental degradation to come and to avert potentially catastrophic destruction. Why should we allow Rise Gold to put us in this unpleasant and unending role? A vastly expanded government bureaucracy would be necessary to serve as a watchdog over mining operations of this scale (the largest operating gold mine in the nation?!) and to enforce penalties. To paraphrase political analyst P.J. O'Rourke: Government can't be tasked to do everything and expect it to be well done.[15]

Do we really want to enlarge our rural county government to serve as a counter-balance to Big Business? Is it really a good use of our resources to have our bureaucracy expand to do such things as send a wildlife biologist (4.34-36) out to rescue a single western pond turtle? Far better not to endanger it and its/her/his fellows in the first place. The County would have to engage lawyers to force Rise Gold to pay for this alleged violation of its contractual agreements, and this would go on and on and on. With the enlargement of our chronically-underfunded County bureaucracy to counter a wealthy business enterprise comes the increased opportunities for bribery and corruption. The County government may be seduced by the prospect of income for the County government: jobs-creation and power expansion from huge permitting fees. Taking a lesson from history, the Bureau of Indian Affairs (or Office of Indian Affairs) was originally created within the Department of the Interior with good intentions: to protect, serve, and uplift the Native people. As time passed, the Bureau's size and budget grew until 50 % of its budget was expended to pay the salaries of non-white employees, and an unfortunately large number of government employees engaged in graft and skimming, exploiting the very people they were supposed to serve. If approved, whose interests will the County of Nevada be serving over the course of the next 80 years: the mine owners, or the people who are its first responsibility: County residents?

CEQA was intended to protect the environment against environmental polluters. Rise Gold has misused a process designed to protect human beings, by turning the EIR into a document that dismisses our quality of life as "insignificant" as well as our culture and our history. The correct take-away from this report is: **"the project's incremental contributions to the significant cumulative impact is cumulatively considerable." (4.0-3)**

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[15] Quote from *Parliament of Whores.*

Respectfully,

Tanis C. Thorne
14504 Hobnob Way, Nevada City

Appendix: Glenbrook Basin (aka Brunswick Basin)[16]

In the mid-1880s, county boosters advocated for the creation of a county fair, and Glenbrook was chosen because of its central location by a 6-1 vote. (*Nevada County Daily Transcript*, April 4, 1885).People could walk there from both Grass Valley and Nevada City. it was a prime candidate because of its existing racetrack, a staple of county fairs at that time. The goal was to create one of the best race tracks and fairgrounds in the western United States; it was"the biggest racetrack in California" according to Vince Seck . The opening was attended by Leland Stanford and California Governor George Stoneman, General Francis Amasa Walker (president of MIT) and Stephen Gage of the Central Pacific Rail Road. 500 persons attended the ball. A dedicatory speech was delivered at the Nevada Theatre by Aaron Sargent. In 1887, the race track became world-class electrification, likely having the distinction of being the first illuminated sporting event at night on Sept. 8, 1887. In 1889, a brook feeding the marsh was damned to create the 2-acre, artificial Lake Olympia (near Plaza Road and Sutton Way).

In the early 1900s, Lake Olympia and Glenbrook Race Track were at the first peak of their popularity. In August 1901, the Nevada County Traction Company, the electric rail line linking Grass Valley and Nevada City, was completed and the first electric car from Grass Valley arrived at Glenbrook. The Traction Company had 4 streetcars running between Pine and Broad Streets in Nevada City and Boston Ravine in Grass Valley (departing hourly from NC) and , passing through Glenbrook Basin near where Olympia Way meets Brunswick Road today. The fare was 15 cents each way. The Traction Co had a successful 25 year electric streetcar line. Coaches were 32 feet long holding 32 passengers inside and 12 outside. On big events, cars left at 15 minute intervals. The opening of the was electric road was dedicated with concerts, reception, parades, dances, the ringing of bells, and mine excursions;

Also in 1901, Lake Olympia had been developed as 15 acre park with a dance floor and pavilion on an artificial island, swimming, canoeing, high diving, summer tourist cabins, confectionery, bar, and bath houses. Teddy Roosevelt visited in 1903. Lake Olympia was reputedly the "most popular spot in Nevada County", a "social and recreational center of Grass Valley and Nevada City. "It was a little piece of paradise, like a 'fun world' today," said local historian Ron Sturgell. "Lake Olympia will always live on in our memories."

In the first half of the 20th century, Glenbrook basin remained the premier location for recreation in Nevada County; its dance hall was the most popular in the county, thanks to the excellent mass transit system in place. It was cheaply and easily accessed by county residents. Residents (miners, ranchers, orchardists) could and did travel from Chicago Park on the narrow gauge railroad to recreate, picnic, tennis, swim, listen to live music and dance many nights a week. Race cars replaced horses at the racetrack, attracting large crowds and competitors from across the western U.S. In the 1920s and 1930s, Big Bands regularly made appearances at Lake Olympia. Lionel Hampton and other big-band musicians provided entertainment on weekends. "There was always good music there," said Helen Williams. Williams grandfather helped build

[16] Brunswick Road bisecting the Glenbrook Racetrack carried traffic to the Brunswick Mine;

the spring floor. "the floor would really bounce," she said. Soldiers stationed at Beal Air Force Base came to dance at Lake Olympia, a popular place for rest and recuperation during World War II.

Thanks to its productive gold mines and low unemployment, Nevada County enjoyed prosperity and entertainment at the Glenbrook Basin while others in the nation struggled. Nevada County residents swam and danced at Lake Olympia. Adjacent to the Idaho-Maryland mine, Glenbrook's racetrack and Lake Olympia were the two symbiotic sides of the Nevada County life: the economic and the social. Each was served by the remarkably efficient and environmentally-friend infrastructure of electric street cars and railways.

Sources:

The major secondary sources on Glenbrook Park are Juanita Kennedy Brown, *A Tale of Two Cities and a Train* (1987) and David Allan Comstock, *Greenbacks and Copperheads, 1859-1869* (1995). Most of the information is drawn from Union newspaper articles; see for example, a 3 part series Nov. 28, 29, 30, 1991. Some clippings are preserved in the Landmark Commission file on Glenbrook Basin, Searls Library (NCHS). Dozens of photographs of the the racetrack and Lake Olympia are preserved there as well; others are found in the Dorsey Collection, Bancroft Library, Berkeley, California. Vince Seck, whose family were the last owners of Lake Olympia has a good collection of photos and newspaper clippings.

INDIVIDUAL LETTER 775: TANIS THORNE (1)

Response to Comment Ind 775-1
This is an introductory comment and does not provide a specific comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR and Administrative Issues.

Response to Comment Ind 775-2
This is an introductory comment and broadly outlines the commenter's disagreement with conclusions identified in the DEIR. The commenter does not provide specific reasons why the environmental analysis was deficient but rather states disagreement with its overall conclusion. Please see Master Response 1 - Non-EIR and Administrative Issues.

Response to Comment Ind 775-3
The commenter asserts there is insufficient research on wind patterns in the DEIR. The dispersion model in the Health Risk Assessment used the most appropriate available data (including wind) for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA**.**

The commenter describes a huge drawdown on water in a mega drought and asserts that using water to control dust is problematic due to the drought. The impacts from groundwater drawdown from mine dewatering have been analyzed in the DEIR and are less than significant after mitigation. Water use for dust suppression was also examined in the DEIR, and impacts related to that use were considered less than significant. (DEIR p. 4.11-36; Appendix N.) As stated on page 4.8-12 of the DEIR, based on the lack of changes in the individual well hydrographs between wet and dry climatic cycles, the amount of recharge appears to be consistent from year to year and is not affected substantially by drought or wet cycles. The commenter describes a grave severity of air-borne pollutants. The health impact of constituents in dust particles produced by various project activities has been analyzed in the DEIR and is less than significant after mitigation measures. The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions. Nevertheless, the EIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. The minimum requirements of the ADMP are provided in the DEIR. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. With regard to health impacts of metals in dust from the mine, these impacts were analyzed in a Health Risk Assessment using conservative assumptions, which reached the conclusion that acute and chronic health impacts would be less than significant under NSAQMD standards. (see Master Response 20 – Conservatism of Metals Assumptions).

Response to Comment Ind 775-4
The commenter asks how often mine rock will be tested for dangerous contaminants, specifically asbestos. As described in DEIR section 4.3.4 (page 4.3-61) and Appendix E.2, Asbestos Serpentine and Ultramafic Rock (ASUR) Plan, two methods of asbestos testing are required. PLM testing is required to comply with the Asbestos ATCM. TEM testing is done to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project. The amount of sampling for asbestos, segregation and management of materials is

described in Appendix E.2 of the DEIR. Air monitoring will be performed and paid for by the applicant in accordance with the approved Asbestos Dust Mitigation Plan (ADMP). Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. The ASUR Plan will be an enforceable condition of approval, and components of the plan will become part of the approved ADMP at the NSAQMD's discretion.

The commenter states the DEIR does not address long-term leakage/wind-borne contamination from engineered fill piles. As stated in the DEIR and reclamation plan (Appendix C of the DEIR), fill slopes and the final pad will be revegetated which would minimize long-term wind erosion on the engineered fill piles. As described in Chapter 3 of the DEIR, the engineered fill placement creates large flat areas suitable for potential future industrial buildings and not 165 tall "towers" as described by the commenter. Nevertheless, the DEIR has concluded the project would have a significant and unavoidable aesthetics impact, in part due to the visibility of the engineered fill piles.

Response to Comment Ind 775-5

The commenter states that more pre-testing and monitoring by 3rd parties for the mine water discharge to protect downstream lifeforms and requests more information on contaminants in water, water treatment, and chemical analysis prior to discharge to South Fork Wolf Creek. The mine water that will be discharged to South Fork Wolf Creek will be treated prior to discharge to ensure that it meets water quality standards set by the Central Valley Regional Water Quality Control Board; therefore, the project has a less than significant impact to water quality in the creek after mitigation. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter states that more precautionary measures are required in the event of storm events and extreme flood events to prevent overflow of untreated mine water to South Fork Wolf Creek. A Preliminary Drainage Analysis (PDA) (Nevada City Engineering, 2019) was prepared and included as DEIR Appendix K.5. As described in DEIR section 4.8.4, the PDA was peer reviewed by the County and potential impacts were analyzed in Impact 4.8-3. As stated in the conclusion to Impact 4.8-3:

> "The drainage analyses discussed above conclude that the project would not significantly alter the drainage patterns of the sites in a manner which would result in substantial erosion or siltation on- or off-site, nor substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, nor create or contribute to runoff water which would exceed the capacity of existing stormwater drainage systems, nor impede or redirect flood flows." (DEIR page 4.8-75)

As stated in Appendix K.5 of the DEIR, the drainage calculations and detention basins are specifically designed to respond to the drainage requirements of the County of Nevada. The Nevada County drainage requirements indicate that new storm drain systems and channels shall be designed to convey the 10- and 100-year, 24-hour storm event. Section 4.5 of Appendix K.2 discusses the 6.4-acre catchment area where precipitation would inflow into the water treatment pond and confirms that the designed freeboard volume is more than adequate to retain the runoff from a 100-year storm event.

The commenter states that regular monitoring of mine water discharge should be done by 3rd parties such as Wolf Creek Alliance and paid for by the applicant. The Central Valley Regional

Water Quality Control Board is the regulatory agency responsible for the regulations pertaining to the mine water discharge and the applicant would conduct monitoring in accordance with the approved Notice of Applicability. The Central Valley Regional Water Quality Control Board would also have enforcement authority over the mine operator for any violations. Please see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 775-6

The commenter asserts that there is insufficient water supply for the project due to drought conditions. The County EIR consultant prepared a water supply assessment (WSA) for the proposed project (see Appendix N) which was analyzed in DEIR Chapter 4.11. The WSA evaluated the adequacy of NID's total projected water supplies, including existing water supplies and future planned water supplies, to meet the existing and projected future water demands, including those future water demands associated with the proposed project, under all hydrologic conditions (Normal Years, Single Dry Years, and Multiple Dry Years) (see DEIR page 4.11-8). The WSA concluded that NID has sufficient water supply to meet the project's demand. DEIR Impact 4.11-7 analyzed whether sufficient water supply exists to serve the project for the foreseeable future and under the previously mentioned conditions. This impact analysis concluded sufficient water supplies would be available to serve the proposed project, as well as existing and reasonably foreseeable future development during normal, dry, and multiple dry years. As a result, this was considered a less than significant impact. In addition, the Nevada Irrigation District has approved the project's water supply assessment and is an expert agency in water supply.

NID has also established contingency measures during drought years. Regarding NID's Water Shortage Contingency Plan, as described in NID's 2020 UWMP (Chapter 6 Drought Plan) and the WSA (Section 6.2 Additional Planned Future Potable Water Supplies), there are numerous management and operational efforts available to NID to address potential supply shortfalls during drought periods. Demand reductions, carryover storage strategies, system operational strategies, supplemental supplies, increased storage, and others are all options available to NID in the event of a water shortage condition. NID will evaluate each specific shortage condition and select the appropriate response action(s) for implementation. If supplies become extremely critical requiring implementation of Stage 6 of NID's Water Shortage Contingency Plan, drinking water supplies to NID's treated water and municipal water customers may be reduced to health and safety use of water only, but would not be cut off.

NID is also in the early stages of a long-term visioning and planning effort to better understand potential future conditions and needs in response to climate change, and identify management and operational practices to meet those needs. The process, Plan for Water, will identify optional water management practices as triggering points in supply, demand, regulatory, legal, and other events are reached. These practices may include supply projects, demand management efforts, policy changes, and others. As the Plan for Water process is developing mitigation measures for drought resiliency, NID will continue to implement its current drought and water shortage contingency efforts as described in NID's 2020 UWMP.

Water used for dust suppression at the Centennial site may be purchased from NID and the project would be subject to the same water restrictions as any other NID customer.

Contrary to the commenter's assertion that the EmGold analysis reached a significantly different conclusion, previous hydrogeologic assessments conducted for Emgold proposals, have come to a similar conclusion as the current analysis despite the use of simplistic analytic solutions. Please see Master Response 13 – Historic Hydrogeologic Assessments.

Response to Comment Ind 775-7

The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Ind 775-8

The commenter states the Centennial Industrial Site Clean-Up project should be included in the analysis of the Idaho-Maryland Mine project. Please see Master Response 4 - Clean-Up Project is a Separate Project Under CEQA. The commenter states that Rise has delayed the cleanup of the Centennial site; however, this is not accurate. Rise is working with DTSC to enter into a voluntary cleanup agreement and is still awaiting DTSC approval to enter into that agreement and begin cleanup. No steps have been taken by Rise to delay cleanup; rather Rise has taken affirmative steps to initiate cleanup at its own expense, of a site that has historic pollution issues not caused by Rise.

The commenter also makes an assertion that because Vehicle Miles Travelled (VMT) was not used to assess potential project impacts, the DEIR underestimated potential impacts, including biology, traffic and noise. The commenter correctly states heavy truck trips used to transport fill to the Centennial site and surrounding construction market were excluded from the VMT analysis. As explained in detail in DEIR section 4.12.4, subsection Project Vehicle Miles Traveled Analysis (see pages 4.12-52 – 55), the VMT legislation, Office of Planning and Research (OPR) guidance, and CEQA guidelines section 16064.4 was based on reduction of greenhouse gases caused by automobiles and light trucks. Nothing in the legislation, OPR guidance documents, CEQA Guidelines, or County traffic analysis guidelines requires heavy vehicle truck trips be included in the VMT analysis. Rather, OPR guidance documents suggest that heavy trucks should not be included in VMT analysis for CEQA purposes. Contrary to the commenter's assertion, heavy truck traffic was included in the noise analysis. The commenter does not explain its comment that heavy trucks would result in biological impacts.

Response to Comment Ind 775-9

The commenter provides additional historical information regarding the region near the project site called Glenbrook Basin. Glenbrook Basin is outside the project footprint and would not be subject to project related surface disturbance and impacts. As noted by the commenter, this area is already heavily developed and is now "one of the County's main centers of commerce."

Response to Comment Ind 775-10

The commenter summarizes DEIR Cultural Resources Impact 4.5-2 and disagrees with the conclusion and mitigation measure identified. As explained in this section, a site-specific cultural resources survey was conducted by a qualified archeologist meeting the Secretary of the Interior's Professional Qualification Standards. This included outreach to the Native American Heritage Commission, surrounding Native American tribes and historical entities, and the Nevada County Landmark Commission (see DEIR pages 4.5-19 – 21). The analysis, conclusion, and mitigation measure in Impact 4.5-2 was based on this extensive site-specific analysis and broad outreach and reflects the judgment of professional experts in the field and the best available information.

Response to Comment Ind 775-11

Please see Response to Comment 775-9 above regarding Glenbrook Basin.

Response to Comment Ind 775-12

Please see Response to Comment 775-9 above regarding Glenbrook Basin.

The commenter also raises general concerns regarding potential ambient noise increases, light, vibrations, and truck traffic within the Glenbrook Basin. The commenter does not provide any specific comments regarding deficiency of the analysis, disagreement with conclusions, or additional potential mitigation measures.

Potential ambient noise increases from proposed project activities and traffic was analyzed in DEIR Chapter 4.10, Impacts 4.10-2 and 4.10-3. The impacts were found potentially significant and mitigation measures were identified, including prohibiting the use of Jake brakes and development and implementation of an ongoing noise monitoring program. These noise impacts were considered less than significant after mitigation.

Aesthetics impacts, including potential for additional light and glare, were analyzed in DEIR Chapter 4.1, Impacts 4.1-3 and 4.1-5. These impacts were considered less than significant.

Ground-borne vibration impacts from underground mining activities were addressed in DEIR Chapter 4.10, Impact 4.10-4. The impact was found potentially significant and the DEIR identified a mitigation measure requiring the preparation and ongoing implementation of a Ground-Borne Vibration Monitoring Program. This impact was less than significant after mitigation.

Transportation impacts are evaluated in Chapter 4.12 of the DEIR. Haul routes are established for the project's heavy trucks, the majority of which do not need to be travelled to access shopping opportunities.

Response to Comment Ind 775-13

Please see Response to Comment Ind 775-9 above regarding Glenbrook Basin. Transportation impacts are addressed in Chapter 4.12 of the DEIR. It is noted that the DEIR includes the following mitigation measure, addressing truck traffic on Brunswick Road:

> *4.12-6(e)* *Prior to commencement of operations, the Project Applicant shall obtain an encroachment permit from Nevada County and install: 1) W51 "Slow Trucks" road sign along Brunswick Road, about 500 feet north of the E. Bennett Road intersection; 2) A second sign shall be installed at the applicant's expense just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.*

Regarding property value concerns, please see Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 775-14

Please see Master Response 1 - Non-EIR and Administrative Issues, and Response to Comment Agcy 8-17 regarding evidence that the project would not result in wasteful or inefficient use of energy.

Response to Comment Ind 775-15

This is a conclusory comment and does not provide a comment on an environmental issue associated with the project. Please see Master Response 1 - Non-EIR and Administrative Issues, regarding project opposition and support, and see Master Response 3 - Operator Responsibility.

Individual Letter 776

UNIVERSITY OF CALIFORNIA, IRVINE
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April 6, 2022

Mr. Matt Kelley
Senior Planner
Nevada County Planning Department
950 Maidu Av, Suite 170
Nevada City, Ca 95959

To Mr. Matt Kelley, Senior Planner:

Ind 776-1 For ease in reading, see a copy of the letter sent to you digitally on April 4, 2022.

Respectfully,

James C. Thorne, Ph.D.

Tanis C. Thorne
14504 Hobnob Way
Nevada City
959-910-5695

corrected typos and grammar, 4/5 1 of 13

April 4, 2022

Mr. Matt Kelley
Senior Planner
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950 Maidu Avenue, Suite 170
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RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

To the Nevada County Board of Supervisors,

I write as a concerned 35-year resident of Nevada County, a retired University of California history professor (Ph.D. UCLA in U.S. History, 1987), and active member of the Nevada County Historical Society.[1] My most recent book is The Nevada City Nisenan (2022). My father resided Atria Grass Valley at 150 Sutton Way until his death in 2016. The impacted area and its various businesses and roads are very familiar to me.

Ind 776-2

Having read the **entire** EIR, **I strongly oppose reopening the Idaho-Maryland Mine.** The draft EIR is misleading in its manipulative selectivity and its omissions, creating a false impression of the relative harmlessness of the mine's dire impacts. Far more scientific research is necessary to protect the environment: the mitigations proposed are far from adequate. I respectfully offer my two part analysis of why approval is a grave mistake for this county:

Ind 776-3

Part I: Environmental/Quantitative: Of 83 identified impacts, 30 were deemed "significant" and only 3 found "unavoidable." I find the analyses of those mine opponents with scientific expertise in the community, such as the CEA, persuasive: that baseline studies on air and water are not current, groundwater models faulty, and mitigations insufficient. That County residents should be subject to **any** increase in traffic, **any** deterioration in air or water quality, or **any** dangers from potential accidents is **unacceptable**. My questions and comments are directed at my primary concerns.

Ind 776-4

I. **Insufficient research on wind patterns:** No where in this EIR is a scientific analysis of wind patterns in the impacted area. Such in-depth study is necessary given the mortal danger of windblown pollutants like asbestos dust. Rise Gold acknowledges this hazard and offers to mitigate by drawing on NID water to tamp down the dust. **Addressing one problem by creating another (a huge draw on water in a mega-drought) is not a viable solution**: it is a double environmental hit on our air and water. Given the grave severity of air-borne pollutants, Rise Gold should be required to do much more investigation and explication and mitigation than they currently offer. There are, as I understand it, two sources of airborne conta-

[1] tanisthorne.com The book includes a chapter on mining by Hank Meals.

minants: dried mud from the dewatered mine [2] and asbestos-laden mine-rock brought to the surface in stupendous volumes. I should like to know more about the process of monitoring and containing such pollutants. Finally, as a known pattern of climate warming we currently experiencing (such as the winter storm of December 2021) is increasingly erratic and intense weather events,[3] worst-case scenerios for wind events should be anticipated, not the best case scenerios anticipated in the EIR. The erection of wind barriers around the areas where mine rock at industrial sites, addresses only one small phase where such fibers could escape into the air. Rise Gold should be required to more than a "half-baked" analysis. The mitigations offered are inadequate.

Ind 776-5

II. How often will the mine rock be tested for dangerous contaminants before piled up at the industrial sites or loaded on trucks? How will asbestos-laden rock be segregated from other waste rock? How will contaminated rock be treated? Who will do the monitoriing and who will pay? Then, there is the rather serious issue, which the MEIR does not address of long-term leakage and wind-borne contamination in the "recuperated zones" of so-called "engineered" mine rock **The mitigation proposed** (as above) **which creates yet another "significant and unavoidable" aesthetic impact** —and more frighteningly a legacy of poison for our descendants—**is unacceptable**: viz. mine rock disposal creating 165-foot tall towers. (Likewise, the "solution" to disposal of mine rock exported by trucks, creates at least two "unmitagatable" impacts.)

Ind 776-6

III. Insufficient research on contaminants entering the South Fork Wolf Creek watershed. Given the danger not only to County residents and biotic environment, but potentially millions more lifeforms living downstream to the Delta and beyond, there needs to be more pre-testing, monitoring by 3rd parties and more precautionary measures in place in the event of storm events (627) Once water from the dewatered mine be brought to the surface, County residents have a right to know what contaminants are in the water, and how treated, and what the chemical analysis is prior to being released into the South Fork. New testing should be done to test water quality now. Again, worst-case scenerios should be anticipated—an extreme flood event—to prevent overflow of contaminated, untreated water from the catchment ponds into the river. The mitigations, while offering some protections against flood events (628) are inadequate (699). Rise Gold should be required to pay the Wolf Creek Alliance or other independent 3rd party for regular monitoring.

Ind 776-7

IV. Unprecedented historic drought conditions have altered conditions, requiring recalibration of the water use projections deemed "insignificant. 42,000 gpd for dust suppression for 6 years may we more than NID can spare. Already, according to Section 11.5, the demand expected

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[2] "The water coming from these mines [after dewatering] that they're dewatering is full of arsenic, manganese, iron, and other heavy metals," says the biologist Josie Crawford, the executive director of the Wolf Creek Community Alliance, another local group that opposes the mine. "It will be treated, but it needs to be treated forever." Quoted in the Atlantic, Jan. 30, 2022.

[3] "How Bad Is the Western Drought? Worst in 12 Centuries, Study Finds."Fueled by climate change, the drought that started in 2000 is now the driest two decades since 800 A.D." By Henry Fountain, *NY Times*, Feb. 14, 2022 https://www.nytimes.com/2022/02/14/climate/western-drought-megadrought.html

to exceed supply in dry years. (840) The mitigation proposed is that additional water could be supplied from the Bear River drainage has no realistic basis. California has mandated water conservation and water is over-allocated everywhere—in other words there are far more stakeholders promised water than there is water.[4] A more accurate hydrologic model is needed to address concerns about groundwater impacts for all well owners in the impacted area, whose concerns have been slighted. EmGold acknowledged the potential threat to well-owners was more serious and widespread. Rise Gold has underestimated the threat to well owners.

Ind 776-8

V. **Greenhouse Gas emissions underestimated.** Rise Gold acknowledges mining operations will be emitting a huge amount - 9000 metric tons per year – but this does account the additional 4000 metric tons per year related to cement manufacturing, that would be well over the 10,000 metric ton per year significance threshold.

Ind 776-9

VI. **Skewing of Data: Omitted** from the report is 1) a complete scientific analysis of the clean-up of the Centennial Industrial Site (CIS), construed as a "separate," but actually an integral part of the mine-reopening project;; and 2) In the Transportation section (pp.: 903-906) the VMTs from heavy trucks, is excluded, as it was not strictly "required". (This is a loophole big enough to drive 118 heavily laden trucks—236 roundtrips—through a day for 80 years.) This leads to underestimates in the negative biological, traffic and noise impacts. Regarding the Centennial Industrial Site (CIS) there is great inconsistency and confusion generated by referring to the clean up there as "Voluntary" (587), thus underplaying the seriousness of the pollution there as one of the nation's top Superfund sites. The EIR repeatedly says this is the company's primary place for dumping mine rock (e.g. 4.3-50, 4.3-11, 4.3-55, 4.3-19) and bases various scientific analyses and calculations upon this "anticipated" chronology (104, 175, 767) when in fact Rise Gold has delayed beginning the clean-up at CIS. These two elements need to be included to get a truly accurate assessment of environmental impacts.

Ind 776-10

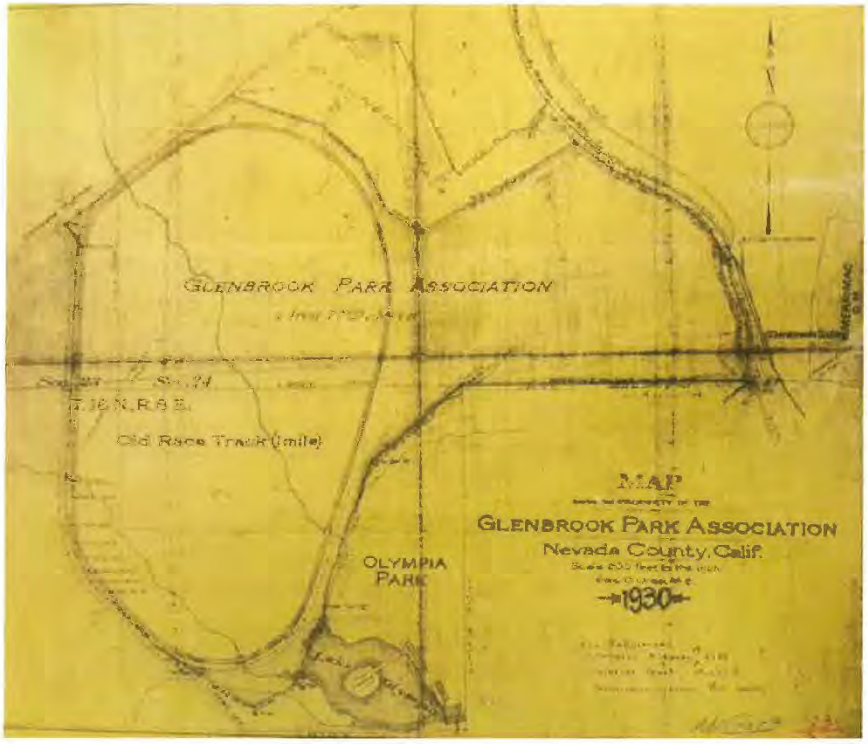
Part 2: A historical-cultural perspective. From a historical-cultural perspective, the draft EIR and the project documents are seriously deficient, specifically in Section 4.5 of the report (Cultural and Tribal Resources). On page 1028 [Section 6.3], the report claims that quantitative and in some cases qualitative evidence has been consulted for each impact, but this is a gross distortion: Rise Gold and its consultants wants to make the entire problem quantitative (and presumably fixable) while ignoring the qualitative effects on the region.

Omission: County History, Culture, and Native Americans: The Impacted Area as a Major County Transportation Hub: These are significant omissions: 1) Two and possibly three Nisenan settlements were in the impact area: Yol si an, Dam im luk, and Si po ny, the last had a large

[4] "In California, rights to water exceed the supply," by George Skelton, *LA Times Capitol Journal*:, April 12, 2015 https://www.latimes.com/local/politics/la-me-cap-drought-water-20150413-column.html

corrected typos and grammar, 4/5 4 of 13

roundhouse and graveyard.[5] These sites were recorded in 1928 by anthropologist Hugh Littlejohn from information acquired from Nevada City and Colfax Indian consultants. Bedrock mortars are located at the corner of Plaza and Sutton within the impact area.(2) There is no mention of Lake Olympia or the Glenbrook Racetrack, both located in the Glenbrook Basin.



Map 1 (above, dated 1930) and Map 2 (below, dated 1924)[6] show the location of the race track and Lake Olympia (the last in the vicinity of the cinema at the junction of Plaza and Sutton). The Glenbrook Basin was registered as an important county landmark[7] in 1993, NEV 93-01.

[5] Hugh W. Littlejohn field notes on Southern Maidu (Nisenan), 1928, p. 39. Online Archive of California; see also Shelley Covert's recent slide presentation for the Bear Yuba Land Trust.

[6] Both maps are in the Searls Library.

[7] landmark defined as a loadstar, guide, beacon in German

* See Exhibit A.

corrected typos and grammar, 4/5 5 of 13



Marker No. 59 is on Sutton Way, south of Brunswick Rd, next to bus shelter in the Glenbrook Plaza parking lot. The Idaho-Maryland mine's buildings were about a mile to the south.

This is the Landmarks Commission description of this historic site:

> "Early In the 1850's Glenbrook Basin first became known as the site of county fairs, horse racing and other special events. When Olympia Park, located at the south end of the basin, opened in 1901, Glenbrook Basin became the recreational center of Nevada County and much of Northern California, and remained so for over fifty years. People would come to the basin by horse and buggy or later the automobile, but those wishing for a little more excitement would often use the Nevada County Traction Company's trolley, or the Nevada County Narrow Gauge Railroad. The large grandstands of the three-quarter-mile racetrack stood near the junction of present Brunswick Road and Sutton Way. Trotting, pacing, and running horse races were held at the track, and motor car races began in 1913. The race-track was one of the first electrically lighted racetracks in the state. A dam was constructed just northeast of the existing electrical substation to form Lake Olympia. The lake soon became one of the Basin's main attractions. Located in the center of Lake Olympia was an island with a pavilion which had a coil-spring-mounted dance floor that swayed with the rhythm of the dancers' feet. There was swimming, boating and fishing in Lake Olympia, and during some winters there was ice skating. There were boats and bathing suits for rent, and the park contained a bathhouse, a roller skating rink, and a bar. Many a romance blossomed on the lake during an evening boat ride under the stars. Families rented cabins and picnicked in the shade of the large pine trees along the shores of Lake Olympia.

Olympia Park was the site of high school commencements, football and baseball games, and special events such as fat ladies' races and freckled-face children contests. The annual miners' picnics were held at the park with mucking and drilling contests, tug-of-wars and Cornish wrestling, as refreshments of various kinds flowed freely. Olympia Park fell into disrepair in the 1950s and ceased operation in 1958. **Glenbrook Basin,** once the recreational center for Nevada County, has **developed into one of the county's main centers of commerce** in supplying various types of shopping, restaurants, services and recreation for the residents and visitors of Nevada County."[8]

Much abundant documentation exists for the cultural and historical importance of Glenbrook Basin as a recreational zone from 1850s to 1950s (See appendix 1).

A poorly planned hub: Subsequent to the closure of the Idaho-Maryland mine after World War I, the basin also ceased to be a recreational center. The basin was rezoned to promote light industry and commerce to promote economic growth. The 49/20 freeway came through in the 1960s when funds for highway improvement came through, bisecting the basin north/south as Brunswick Road had done a century before west/east. Lamentably, the automobile brought an end to the County's exceptionally-efficient and integrated mass transit system. As early as 1971, the poor planning of the area was acknowledged as "development gone awry." In fact, there had been no master plan, and one bad decision after another was made. The Basin was a hodgepodge of architectural styles, fast food joints, already facing traffic congestion. The water courses were paved over and the hillsides carved up. Names of streets and shopping malls retain the history of this past era, and there are some physical reminders as well, for example, some of the original tourist cabins along the Nevada City Highway, As one descends from the freeway to Sutton on Dorsey, the exhilerating, sweeping road curve follows the hoof-print of the defunct racetrack. Because of its **centrality in the County,** it nonetheless emerged as "Nevada County's most vital commercial area"[9] by the early 1990s.

Reopening the Idaho-Maryland will add yet another layer of damage to an already overcrowded badly planned road system, burdening it with bad air and heavy truck traffic. At the very least, as a mitigation Rise Gold should be required to pay for redesigning the bridge spanning the freeway and onramps to the freeway along Brunswick Road to create separate lanes for heavy truck use.

Ind 776-11

Evidence and lack of evidence of Indian occupation and its mediation: The EIR correctly observes that mining destroyed the cultural landscape of what existed prior to the gold rush. There are no registered archaeological sites in the Glenbrook Basin; indeed, there would not be as neither the United Auburn people, nor the Taylorsville Tsi Akim, nor the Nevada City Rancheria has jurisdiction in this area. The Rancheria has no legal standing as it is not federally-

[8] Excerpted from: David Comstock and Bernard Zimmerman. "Exploring Nevada County." Apple Books. "https://nevadacountylandmarks.files.wordpress.com/2017/05/glenbrook-basin.pdf

[9] *The Union* Nov. 29, 1991, p. 1.

Exhibit A Shelly Court presentation 2022

Properties

Name: WellsCoalitio...

Type: application/pdf

Size: ~182 KB

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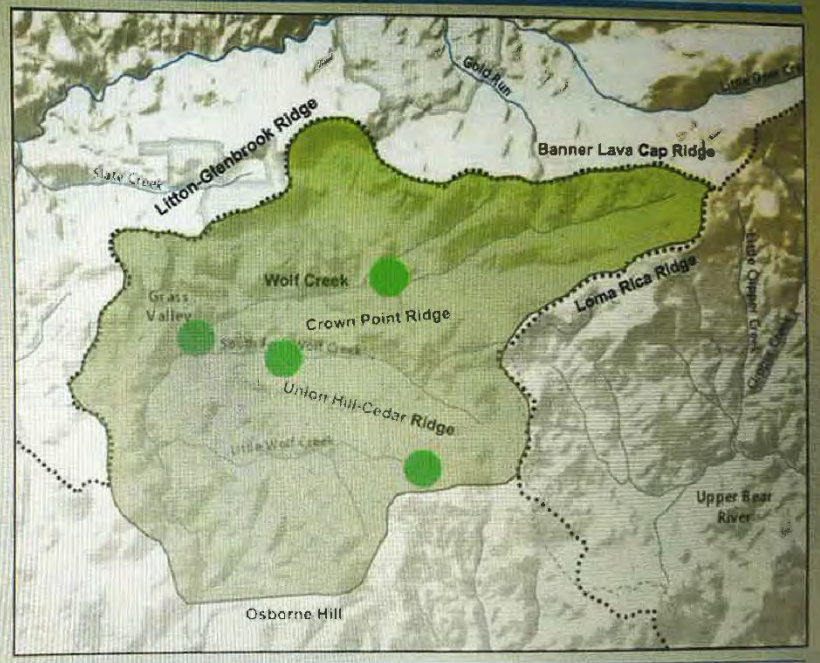
Original inhabitants:
Nisenan

- 4 villages - Daspah, Yolosyan, Dapimuluk & Hoydok
- Managed landscape to enhance ecosystems
- Full assemblage of species and habitats



Gary Griffith, WCCA

recognized and therefore had no voice in demanding or monitoring any archaeological project in the basin mandated under CEQA. The fact that there may be village sites, one with a graveyard, advises an abundance of caution. The EIR states (p. 6-26) that "the implementation of the proposed project could result in a **significant but mitigatable impact to unknown** archaeological resources and Tribal Cultural Resources." This is because disturbance of Central Hill Nisenan archaeological sites during construction is possible. The mitigation for such an eventuality is to follow established procedures by bringing in an archaeologist as consultant (4.5-2 and 4.6 ff; pp. 524-527). **This mitigation is inadequate.** How can one mitigate an unknown? The Native American Heritage Commission's Sacred Lands file preserves the record of only a tiny percentage of the places sacred to Native Californians. Heavy machinery used in construction and mining would obliterate any traces of artifacts or bones. **A mitigation by Rise Gold should include a full archaeological exploration and accompanying CRM (Cultural Resource Management Report with Native monitors). There should be sample testing at several places, especially in construction areas, prior to the project beginning. At the very least, , the area which has known bedrock mortars in the vicinity of Lake Olympia should be thoroughly investigated by professional archaeologists.** This would serve the double-purpose of discovering possible remains from the Lake Olympia recreational site: foundations for buildings, etc.

Geo-physical and hydrological evidence suggest conditions were highly favorable for Indian village site(s) in the Glenbrook Basin. This is flat valley (first used by settlers for dairying) fed by numerous springs and creeks entering the basin from both the west and the east hillsides, thus creating meadows where a diversity of wildlife flourished, ideal for Nisenan seasonal and semi-permanent camp sites.[10] The first mention of the Glenbrook Basin in the historical early 1850s was wrestling and racing events, consistent with popular entertainments drawing miners and Indians as participants, such as those documented at Storm's Ranch in present-day Chicago Park and Bouvyer's Ranch on Deer Creek in 1850s. A racetrack at that site dates back to the mid-1850s. A marsh in the southeastern corner of the basin is where bedrock mortars have been identified.

Ind 776-12

Analysis: Rattling the Bones of Our Elders/Omitting County Culture and History as Irrelevant. Since there are few if any above-ground physical remains, the point seems moot.[11] However, 1) Glenbrook Basin is a very significant place in Nevada County history, arguably the site of Nevada County's most glorious era from the 1880s to WWII when public transportation was king and environmentally-friendly: the electric tram and the narow gauge railroad linked Colfax, Nevada City, and Grass Valley. 2) More to the point: the Glenbrook Basin has always been a central place dating far back into pre-histoy. Historically, it is a hub of

Ind 776-13

[10] Geohub aAs defined by archaeologist Hank Meals, A meeting and living place based upon favorable topography where trails converge, connecting watersheds and ridges and offering access to territories of many groups," (Hank Meals). Places of abundant resources, adjacent to springs and/or wetlands favorable for trade, ceremonial events, and social transactions. See glossary, *Nevada City Nisenan.*

[11] but all that remained of I-M was a silo and a lot of mining pollution at CIP, yet it was on the Register of Historical Places.

transportation, a major artery for Nevada County. The draft EIR report's failure to acknowledge our history and current needs—the importance of the basin for travel and trade, for residential occupation, and for housing our elderly— demonstrates an insensitive and callous indifference —or deliberate obfuscation —that is highly objectionable, and should not be allowed to pass without comment. These omissions are deserving to note:

- No mention is made of the nursing homes and assisted living areas concentrated along Dorsey/ Sutton: Atria, Spring Hill Manor, the Golden Empire, Some elders still drive to or walk or drive wheelchairs on newly installed sidewalks to Brunswick Basin shops. A demographic analysis of the impact area should have been included the dense concentration of the elderly here. The 2570 acres in the Glenbrook Basin whose 73 miles of underground tunnels will be worked is an area where some of the most vulnerable County residents are concentrated: the homeless, and poorer, older, and ailing persons. A rise in ambient noise and light, seismic vibrations from explosions, construction and truck traffic, 16 hours a day, is inhumane.
- The tangible impacts to those above the tunnel area has been consistently underestimated.
- What the report fails to mention is that the reopened mine will do so much damage to a prosperous, stable, and high-functioning district with light industry, businesses, and homes. Rural residents depend on the varied services here, e.g. banks, Verizon, well service, pharmacies, etc..
- Anyone that travels on Brunswick Road from the freeway to 174 knows how dangerous it already is and that it is far worse in bad weather. Imagine how intimidating it will be for the elders of our community to have to brave 14-ton trucks, some with explosives, when they venture out to shop or buy other supplies. Traffic accidents are inevitable.

Privileging the mining history in Section 4.5 of the report creates an illusion of continuity and disguises the profoundly aberrant nature of the proposal to reopening the I-M gold mine. We are in a post-industrial historic period. We are still remediating the damage to Native people and to the environment from the last epoch of mining. What is obvious to county residents is blithely swept aside in the report: the impact zone **at an intersection of 49/20 and the Brunswick Road to 174 to Colfax is a transformation hub.** This is a "**central**" place on our landscape. Anyone who lives here knows the area is already congested and poorly planned, that Brunswick Road is dangerous, especially so in winter, and air quality already marginal and downright unhealthy during the fire season. A decline in property values is inevitable, especially for homes on Bennett Street and over the tunneling area. Property owners in this impact area were told by realtors as required by law that they were buying where underground mining rights were still active, but in a zone which banned heavy industry.. The residents of this area are the "new Indians" as history repeats itself. Homeowners, renters, and business owners—promised one thing—can continue to work and live in the mining area, but only at the cost of the destruction of their tranquility and the poisoning of lifeforms and/or total destruction of habit. No point in expecting or demanding compensation for losses; this is a one-way deal.

Ind 776-14

Ind 776-15

Conclusion: "Wherefore the future?" Rise Gold plays a double game, saying on the one hand, quality of life issues are "intangible," unmeasurable, and therefore unscientific and at same

time the report claims brazenly that qualitative evidence has been incorporated for each impact category. This is an untrue statement.[12] What we see here is a very slick strategy to "control the narrative" and thereby exclude information from the report that does not support their project about the how mining would ruin the peace,and quiet of rural life in this County.

1. **A Sustainable Future or Years of Seige?** What sureties/guarantees, permits, inspections could offset real as well as potential negative impacts and risks? The draft EIR attempts to apply all manner of technical fixes in service of corporate profit. This is one where we march forward into the past by attempting to reimpose an archaic industrial past on a post-industrial present. Nevada County is better than that. Over the last half-century, governmental laws and policies direct us towards better environmental practices: stewardship, conservation, checking the worst mistakes of the past, and implementation of technologies that reduce waste. We have mandates
    - to reduce automobile usage and greenhouse gas emissions
    - to encourage bicycle use (872, 976) and pedestrian traffic
    - to reduce our electricity consumption and water consumption
    - to improve the health of our forests
    - to improve aesthetics by imposing building codes
    - to clean up polluted areas and cease poisoning our rivers and creeks.

Approval of the Rise Gold's mining operations would require a number of code changes, one allowing unsightly, post-apocalyptic, 7-story high piles of mine rock, another returning Glenbrook Basin to an industrial rezoning. While engaging in stone-walling denial that degradation of the environment is "significant," the report shows degradation on multiple fronts. To rezone the Basin now, would be a betrayal to homeowners and just cause for litigation.[13] Approving the mine is going in the wrong direction. Nevada County Board of Supervisors should be leading us to a better future, not a worse one. We have a beautiful landscape, a growing population, and booming tourist industry. Why not show some character and vision, and put the mass back into transit, and make Nevada County a pioneer in implementing environmentally-friendly technologies? It was quite alarming to hear at the public hearing last Thursday at the Rood Center that Rise Gold 's use of electric power would gobble up most of the hard-won gains of electricity conservation. Consumers should not be asked to conserve so that foreign investors can profit. Economic benefits to County residents are chimerical; this propaganda should be exposed for what it is. Far more jobs and County property taxes will be created by projects that are approved or are reasonably foreseeable in the next five years (4.12-35, 4.12-43; pp. 886. 899)

[12] 1 On page 1028 [Section 6.3], the report states that quantitative and in some cases qualitative evidence has been consulted for each impact.

[13] Tony Lauria, *Union*, March 7, 2022, A4; cf. https://www.waterboards.ca.gov/rwqcb5/

Rise Gold, as many have pointed out, is not a reliable partner, and Ben Mossman is not credible. Canadian mining companies have a notorious record of making false promises and leaving environmental messes off-shore and within California itself in recent years,.[14] The Canadian Sonora Mining Company, for example, skipped town and left the taxpayers of California with a $30 million dollar clean up at the Jamestown Mine. Rise Gold has shown a willingness to make mitigations in Nevada County, but only when it is pressed to do so. In the course of this review process, some critics have suggested Rise Gold be required to put up sizable amounts of money to cover costs to individual well-owners or to the County. More numerous and regular and frequent site inspections or monitoring by objective, third parties could be required. I see these as ineffectual. **Could there ever be enough monitoring to ensure pollutants weren't entering the air or water.? How could we be exempt from freak accidents or meteorological events like windstorms or floods?** Realistically, as Robert Hubbard of the CEA and others have pointed out, once the mine is up and in operation and making profits for its non-resident investors, Rise Gold would simply pay penalties rather than cease operations and correct the violations. Worst comes to worse, taxpayers are left with clean-up costs as they were at Jamestown mine. Personally, I would like to see test runs, as well as more scientific study. 14-ton trucks should run up and down Whispering Pines and Brunswick 16-hours a day to see if anyone notices increased noise or traffic congestion. As a sign of trustfulness and commitment to the well-being of our community, Rise Gold should first clean up the Centennial Industrial Site to community members' satisfaction; then and only then will we consider reopening the Idaho-Maryland mine.

Ind 776-16

2. The real core of the problem, however, is this: Rise Gold has put us on the defensive in our own land. Our safety depend on regular monitoring, honesty, and proper enforcement. Hundreds and hundreds of hours by private citizens, environmental groups, and county government employees have already been expended to protect the status quo. (I have put in more than 200 hours working on this existential threat.) If approved, thousands more hours will be required to minimize the environmental degradation to come and to avert potentially catastrophic destruction. Why should we allow Rise Gold to put us in this unpleasant and unending role? A vastly expanded government bureaucracy would be necessary to serve as a watchdog over mining operations of this scale (the largest operating gold mine in the nation?!) and to enforce penalties. To paraphrase political analyst P.J. O'Rourke: Government can't be tasked to do everything and expect it to be well done.[15]

[14] For example, Canadian Mining in Latin America: Exploitation, Inconsistency, and Neglect June 11, 2014 COHABy Malavika Krishnan athttps://www.coha.org/canadian-mining-in-latin-america-exploitation-inconsistency-and-neglect/#:~:text=Canadian%20firms%20such%20as%20Barrick,the%20development%20stage%20%5B3%5D.

[15] Quote from *Parliament of Whores.*

corrected typos and grammar, 4/5 11 of 13

Do we really want to enlarge our rural county government to serve as a counter-balance to Big Business? Is it really a good use of our resources to have our bureaucracy expand to do such things as send a wildlife biologist (4.34-36) out to rescue a single western pond turtle? Far better not to endanger it and its/her/his fellows in the first place. The County would have to engage lawyers to force Rise Gold to pay for alleged violations of its contractual agreements, and this would go on and on and on. With the enlargement of our chronically-underfunded County bureaucracy to counter a wealthy business enterprise comes the increased opportunities for bribery and corruption. The County government may be seduced by the prospect of income for the County government: jobs-creation and power expansion from huge permitting fees. Taking a lesson from history, the Bureau of Indian Affairs (or Office of Indian Affairs) was originally created within the Department of the Interior with good intentions: to protect, serve, and uplift the Native people. As time passed, the Bureau's size and budget grew until 50 % of its budget was expended to pay the salaries of non-white employees, and an unfortunately large number of government employees engaged in graft and skimming, exploiting the very people they were supposed to serve. If approved, whose interests will the County of Nevada be serving over the course of the next 80 years: the mine owners, or the people who are its first responsibility: County residents?

CEQA was intended to protect the environment against environmental polluters. Rise Gold has misused a process designed to protect human beings, by turning the EIR into a document that dismisses our quality of life as "insignificant" as well as our culture and our history. The correct take-away from this report is: **"the project's incremental contributions to the significant cumulative impact is cumulatively considerable." (4.0-3)**

Respectfully,

Tanis C. Thorne
14504 Hobnob Way, Nevada City

Appendix: Glenbrook Basin (aka Brunswick Basin)[16]

In the mid-1880s, county boosters advocated for the creation of a county fair, and Glenbrook was chosen because of its central location by a 6-1 vote. (*Nevada County Daily Transcript*, April 4, 1885).People could walk there from both Grass Valley and Nevada City. it was a prime candidate because of its existing racetrack, a staple of county fairs at that time. The goal was to create one of the best race tracks and fairgrounds in the western United States; it was"the biggest racetrack in California" according to Vince Seck . The opening was attended by Leland Stanford and California Governor George Stoneman, General Francis Amasa Walker (president of MIT) and Stephen Gage of the Central Pacific Rail Road. 500 persons attended the ball. A dedicatory speech was delivered at the Nevada Theatre by Aaron Sargent. In 1887, the race track became world-class electrification, likely having the distinction of being the first illuminated sporting

[16] Brunswick Road bisecting the Glenbrook Racetrack carried traffic to the Brunswick Mine;

event at night on Sept. 8, 1887. In 1889, a brook feeding the marsh was damned to create the 2-acre, artificial Lake Olympia (near Plaza Road and Sutton Way).

In the early 1900s, Lake Olympia and Glenbrook Race Track were at the first peak of their popularity. In August 1901, the Nevada County Traction Company, the electric rail line linking Grass Valley and Nevada City, was completed and the first electric car from Grass Valley arrived at Glenbrook. The Traction Company had 4 streetcars running between Pine and Broad Streets in Nevada City and Boston Ravine in Grass Valley (departing hourly from NC) and , passing through Glenbrook Basin near where Olympia Way meets Brunswick Road today. The fare was 15 cents each way. The Traction Co had a successful 25 year electric streetcar line. Coaches were 32 feet long holding 32 passengers inside and 12 outside. On big events, cars left at 15 minute intervals. The opening of the electric road was dedicated with concerts, reception, parades, dances, the ringing of bells, and mine excursions.

Also in 1901, Lake Olympia had been developed as 15 acre park with a dance floor and pavilion on an artificial island, swimming, canoeing, high diving, summer tourist cabins, confectionery, bar, and bath houses. Teddy Roosevelt visited in 1903. Lake Olympia was reputedly the "most popular spot in Nevada County", a "social and recreational center of Grass Valley and Nevada City. "It was a little piece of paradise, like a 'fun world' today," said local historian Ron Sturgell. "Lake Olympia will always live on in our memories."

In the first half of the 20th century, Glenbrook basin remained the premier location for recreation in Nevada County; its dance hall was the most popular in the county, thanks to the excellent mass transit system in place. It was cheaply and easily accessed by county residents. Residents (miners, ranchers, orchardists) could and did travel from Chicago Park on the narrow gauge railroad to recreate, picnic, tennis, swim, listen to live music and dance many nights a week. Race cars replaced horses at the racetrack, attracting large crowds and competitors from across the western U.S. In the 1920s and 1930s, Big Bands regularly made appearances at Lake Olympia. Lionel Hampton and other big-band musicians provided entertainment on weekends. "There was always good music there," said Helen Williams. Williams grandfather helped build the spring floor. "the floor would really bounce," she said. Soldiers stationed at Beal Air Force Base came to dance at Lake Olympia, a popular place for rest and recuperation during World War II.

Thanks to its productive gold mines and low unemployment, Nevada County enjoyed prosperity and entertainment at the Glenbrook Basin while others in the nation struggled. Nevada County residents swam and danced at Lake Olympia. Adjacent to the Idaho-Maryland mine, Glenbrook's racetrack and Lake Olympia were the two symbiotic sides of Nevada County life: the economic and the social. Each was served by the remarkably efficient and environmentally-friend infrastructure of electric street cars and railways.

Sources:

The major secondary sources on Glenbrook Park are Juanita Kennedy Brown, *A Tale of Two Cities and a Train* (1987) and David Allan Comstock, *Greenbacks and Copperheads, 1859-1869* (1995). Most of the information is drawn from Union newspaper articles; see for example, a 3 part series Nov. 28, 29, 30, 1991. Some clippings are preserved in the Landmark Commission

corrected typos and grammar, 4/5 13 of 13

file on Glenbrook Basin, Searls Library (NCHS). Dozens of photographs of the the racetrack and Lake Olympia are preserved there as well; others are found in the Dorsey Collection, Bancroft Library, Berkeley, California. Vince Seck, whose family were the last owners of Lake Olympia has a good collection of photos and newspaper clippings.

INDIVIDUAL LETTER 776: TANIS THORNE (2)

Response to Comment Ind 776-1 through 776-16

This letter is a duplicate of Individual Letter 775. Please see Responses to Comments Ind 775-1 through 775-15.

Individual Letter 777

March 23, 2022

Nevada County Planning Department
950 Maidu Avenue, Ste 170
Nevada City, CA. 95959-790

Attn: Planning Commission/Board of Supervisors

To whom it may concern:

Ind 777-1

My name is Ted Ahrens and my wife and I have been residents here in Nevada County for 17 years. Since I am a pilot, the airport here attracted me originally, but the great outdoors and the natural habit drew us both to this area.

I fear this habitat is now in jeopardy with the proposed mine and I am very much against it due to its effect upon it. I am concerned about its impact on our air quality and our water quality. It very likely will drain our ground water sources which may affect our wells that are already being threatened by droughts. I am also troubled by the thought of the diesel fumes and constant noise the equipment will put out. This mine will definitely affect our quality of life in many ways in Nevada County.

As I understand this proposal, there is no independent monitoring of any of these issues and I would like this inadequacy to be addressed. I would also appreciate a response to my concerns as they are the same as just about everyone I know around this area. We already have so many reasons to flee California with the drought, fire and tax issues, and we don't need another reason to leave.

Sincerely

Ted Ahrens
AV8Ted@gmail.com
14974 Quartz Lane
Nevada City, CA. 95959

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 777: TED AHRENS

Response to Comment Ind 777-1

The commenter states that no independent monitoring program is proposed for the project. Among the many mitigation measures required in the DEIR are monitoring programs for noise (Mitigation Measure 4.10-3), vibration (Mitigation Measure 4.10-4), and groundwater (Mitigation Measure 4.8-2), all of which will have oversight from Nevada County. In addition, Chapter 4 of this Final EIR contains the mitigation monitoring and reporting program that will need to be adopted by the Nevada County Board of Supervisors, if the project is approved. The MMRP includes all of the project mitigation measures, identifies timing for completion of mitigation requirements, and identifies local and state agencies responsible for monitoring. To the extent the applicant receives permits from other state and federal agencies, those agencies will be responsible for their enforcement. The commenter is also referred to Master Response 3 - Operator Responsibility.

Regarding groundwater resources concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Regarding diesel exhaust, the DEIR's health risk assessment analyzed diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Regarding operational equipment noise, please see Response to Comment Ind 733-4.

Regarding drought concerns, please see Master Response 16 – Drought and Climate Change.

Quality of life concerns are outside the scope of CEQA – please see Master Response 1.

Individual Letter 778

March 28, 2022

Teresa Eckerling

520 Linden Ave

Grass Valley, CA 95945

530-277-6157

TO Matt Kelley, Senior Planning, Nevada County Planning Department

950 Maidu Ave, Suite 170

Nevada City,CA 95959-7902

Dear Mr. Kelley and the Nevada County Planning Department

Ind 778-1

I do NOT support the reopening of the Idaho Maryland Mine. Our county does not need the additional air and water pollution, traffic congestion, and excessive noise 24 hours a day. This is insane!! The opening of the mine will cause many to move away including my family, it will hurt local tourism with all the noise and congestion. Our community will see increased medical issues straining our medical resources. We see the water treatment near the Empire Mine due to continued leaching of chemicals that are still underground from prior mining. At a time we are trying to save the earth, reduce fossil fuels, slow climate change and protect our endangered species we can not go backwards and further damage future generation. I urge you to reject the mine project. Save our county, our community, our lives.

Thank you

Teresa Eckerling

RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

INDIVIDUAL LETTER 778: TERESA ECKERLING

Response to Comment Ind 778-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to water pollution, please see Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. For concerns related to traffic, please see Chapter 4.12, Transportation. For noise concerns, please see Chapter 4.10, Noise and Vibration.

The commenter's opposition to the proposed project is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 779

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902
Phone: 530-265-1423
Email: Idaho.MMEIR@co.nevada.ca.us
Re: Idaho Maryland Mine

January 15, 2022

Dear Matt,

Each season I listen to the music of Wolf Creek outside my door and hope for another year of clean, sufficient water. One year ago, I wrote a letter to each member of the Nevada County Board of Supervisors, adding my voice to the many citizens expressing concern over the environmental, economic and health concerns that I believe will place a damper on the progress this county has made since the original Gold Rush days if the Rise Gold Mine is approved.

Ind 779-1

I will readdress those concerns below. In the meantime, I want to add that recent letters to the editor in the Union have cited some important questions and alternatives. Dan Desmond voiced what many have expressed—shock that Rise Gold's environmental impact report has continued to receive misleading and positive press coverage, after the original "survey" misreported public support. The letter to the Union stated that Paul Schwarz had offered environmental alternatives. Another letter to the editor from Eric Zibbel offered a specific idea of expanding the Nevada County Fire Safe Council's free green waste drop-off program on the mine site. He wondered, however, how to start such a civic-minded business on land already owned by Rise Gold. Was Rise Gold permitted to purchase the property without first permitting the use? Can they be forced to sell or lease it to the county if their business permit is not granted?

I'm sure I echo the thoughts of many professionals, homeowners, commuters, business owners, environmental advocates, health care workers or patients with health concerns, and citizens concerned about the legacy their children and grandchildren will inherit -- people who have already weighed in around the breakfast table, at the very least, on the various reasons not to approve the environmental impact statement for the mine. Some have spoken up in writing. I will restate these concerns anyway:

Health and Air Quality:

Respiratory therapists have expressed alarm at the devastating potential impact of building this mine. Already, we face poor air quality through the long and intense wildfire seasons. Adding asbestos or other invisible dangerous chemicals involved in the creation and operation of this mine would further jeopardize the health of people with asthma, COPD, and heart or lung conditions.

Traffic Flow:

The new congestion caused by the trucks transporting the materials across town would clog major thoroughfares each day. Increased traffic drives away new business as well as out-of-town homebuyers

1

formerly attracted to the beauty and pace in this county. Those seeking solace—as tourists, potential businesses, and real estate shoppers—would spend their dollars elsewhere.

Noise Pollution:

Businesses and other agencies within earshot of the mine would feel as though we have turned the clock back 170 years, to a time when the need for economic growth justified the noise impact of mining in Nevada County. Today, it is unjustified. In-city mines are rare largely because they fail to consider the needs of a community's safety and quality of life.

There is no certainty that new jobs at the mine would add to economic growth as much as the mine would interrupt the economic benefits Nevada County have already worked so hard to develop, through tourism, agriculture and technology—options that promote sustainability of humans, the environment and the economy.

Environment:

Many of today's Nevada County citizens came here because they value the environment rather than to monetize untapped geologic resources. New clean energy jobs and recreational options better allow us to preserve our natural resources. Creative thinkers in our county have suggested several alternatives. Why not consider them?

Property Values:

Ind 779-2

As a result of these and other potential impacts, some realtors fear a decline in property values based on rumors of an intown mine. A continuing decline in prices could destabilize an economy already facing issues of survival and revival in the post-Covid-19 days to come. Due to its visibility and impact on anyone conducting personal business in town, the mine could reduce the price of homes throughout the county, not just those in the surrounding neighborhoods. A decline in property values would also affect the long-term property taxes collected in the county. How would these hardships be offset?

Ind 779-3

Please preserve the long-term legacy of the county's planning division. Some of us were very pleased when the county took a long-term view by installing solar panels near Champion Road to power county facilities, honoring long-term benefits over short-term costs. We hope that, once again, the future impact of this decision on the quality of life in Nevada County will remain a priority. Our economic health and sustainability depend on sensitivity to a complex set of factors and openness to alternatives, it seems. Please consider this public perspective as you faithfully strive to ensure the well-being and diverse needs of our community members, who feel certain that mining impacts could negatively affect the health, resiliency, and quality of life of current constituents and their descendants throughout the coming century.

Sincerely,

Teresa Langness
17512 Brewer Road
Grass Valley CA 95949
tlangness@gmail.com

INDIVIDUAL LETTER 779: TERESA LANGNESS

Response to Comment Ind 779-1

The commenter refers to others who have allegedly identified alternatives to the project. It is noted that the DEIR evaluates alternatives to the proposed project in Chapter 6. As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternatives analysis is not required to consider every project alternative but is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The alternative analysis in the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis since they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail (see DEIR section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers. Regarding the commenter's generally noted noise concerns, please see Response to Comment Ind 733-4.

The commenter also expresses social and economic concerns, which are outside the scope of CEQA – Please see Master Responses 1 and 2.

Response to Comment Ind 779-2

Please see Master Response 2.

Response to Comment Ind 779-3

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not warrant a more specific response. Please see Master Response 1.

Individual Letter 780

From: Teresa Wagner
To: Ed Scofield; bdofsupervisors
Subject: Re: Mine
Date: Saturday, February 19, 2022 6:46:44 AM

Dist 2

CAUTION: This email is from an external sender. If you are not expecting this email or don't recognize the sender, consider deleting.

Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

Ind 780-1

Please do not allow this to happen to our town.

NO RISE MINE

Thank you,

Teresa Wagner
10958 Henson Way
Grass Valley
530.210.0173

INDIVIDUAL LETTER 780: TERESA WAGNER

Response to Comment Ind 780-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 781

RECEIVED
APR 04 2022

April 4, 2022

To: Matt Kelley,

Senior Planner/ Project Manager

Nevada County Planning Department, and Nevada County Planning Commission

Re: Rise Gold Mine Proposal EIR

The Rise Gold Mining Project for the reopening of the Idaho Maryland Mine has produced an EIR that is riddled with errors, misleading plans, and unspecified impacts. The inadequacy of the EIR and the potential for serious impacts to this community should not be accepted. Please have common sense and do not approve of this project.

Some of the specific issues:

Air Pollution from an incredible number of probable truck trips resulting in climate change and worsening particulate content to challenge asthmatics like me.

Water Pollution into our downtown stream of Wolf Creek which already has compromised quality.

Ind 781-1

Toxic Waste of asbestos laden mine rock to the Centennial site in the heart of our downtown!!

Well water losses that cannot be made up for by hooking up NID. Resulting ongoing costs to homeowners as well as decreased property values.

The unbearable noise for all human and especially wildlife that lose survival functionality.

The traffic congestion, accidents and road wear from trucks overloading our 2 lane roads with blind driveways in particular.

Lack of adequate and bonded cleanup measures from ongoing operations as well as a reclamation plan that can serve in perpetuity. Mossman is not to be trusted based on his history with prior Canadian projects.

Detrimental losses to our business community from decreased travel related uses and needs.

I have owned property in Nevada County since 1977, and bought 3 homes here. So, I have a vested interest in the well-being of our community and our intrinsic environment, and trying to maintain our high quality of life that would be substantially altered with this project.

I am a retired Land Use and Transportation Planner, as well as a Fish and Wildlife Biologist who has critiqued many EIRs. The Rise Gold EIR just doesn't cut it, nor does its plan to permanently disrupt and alter our peaceful and serene quality of life.

Thank you for your consideration,

Terri Pencovic

12430 Squirrel Creek Road, Grass Valley CA 95945

INDIVIDUAL LETTER 781: TERRI PENCOVIC

Response to Comment Ind 781-1

The commenter's quality of life concerns are outside the scope of CEQA – please see Master Response 1.

The commenter asserts that the DEIR is riddled with errors, misleading plans, and unspecified impacts, but provides no specific evidence, only general concerns. Regarding air pollution from truck trips, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the EIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HR A presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Regarding water pollution concerns in Wolf Creek, please see Master Response 35 – Discharge to South Fork Wolf Creek; regarding concerns about deposition of mine waste on the Centennial Site, please see Master Response 8 – Mine Waste Characterization; regarding water well concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding noise concerns, please refer to Chapter 4.10, Noise and Vibration, and for effects of noise on wildlife, please see Chapter 4.4, Biological Resources (pg. 4.4-74ff).

Regarding road wear concerns, the DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).)

As stated on page 4.6-24 of the DEIR, to ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. Please also see Master Response 3 – Operator Responsibility.

Individual Letter 782

From: Terry Anderson <itstea@gmail.com>
Sent: Wednesday, March 30, 2022 10:00 PM
To: Idaho MMEIR
Subject: Mine proposal

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Ind 782-1

My family is NOT in favor of granting a County permit to operate the mine in Grass Valley. It will ruin our towns character. This is 2022 and the mining industry in this County is history. Take a look around and explain how this foreign enterprise helps our communities.

No on the mine.

Terry and Connie Anderson
15245 Lewis

Virus-free. www.avast.com

INDIVIDUAL LETTER 782: TERRY AND CONNIE ANDERSON

Response to Comment Ind 782-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 783

I support re-opening the Idaho-Maryland Mine NO!

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new good jobs is a once-in-a-generation opportunity to revitalize our local economy.

I DO NOT SUPPORT THIS

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also save an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind
783-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Terry McLaughlin

Address Grass Valley

Phone

Email Address

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

INDIVIDUAL LETTER 783: TERRY MCLAUGHLIN

Response to Comment Ind 783-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration. Please see Master Response 1.

Individual Letter 784

IDAHO-MARYLAND MINE PROJECT
DRAFT EIR COMMENT FORM

To document the author of comments received, please provide the following information. Thank you.

Name: TESS LOTTER

Address: 2036 NEVADA CITY HWY, GV, CA, 95945

Organization (if applicable): _____

Please provide us with your written comments on the Idaho-Maryland Mine Draft EIR by **5:00 PM, April 4, 2022**. Comments may be placed in the comment box located in the back of the Board of Supervisors Chambers during the Special Public Meeting of the Nevada County Planning Commission. Written comments may also be submitted (email or hardcopy) to the address below:

RECEIVED
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue
Nevada City, CA 95959-8617
Idaho.MMEIR@co.nevada.ca.us

Ind 784-1

This mine will completely devastate our water, plant, soil, animal life and air quality
Eighty years of noise pollution and disruption to our community is not worth any amount of money
You will have bad karma if you let this go through, you will have the ~~ee~~ weight of all the lives you negatively affected, including all the children of the future generations

INDIVIDUAL LETTER 784: TESS LOTTER

Response to Comment Ind 784-1

The comment does not address the adequacy of the DEIR, but expresses general concerns and opposition to the proposed project – please see Master Response 1. Regarding general water concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells; regarding general air concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; regarding concerns about impacts to plant and animals, please see Chapter 4.4, Biological Resources; and regarding general noise concerns, please refer to Chapter 4.10, Noise and Vibration.

The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 785

RECEIVED
APR 04 2022
NEVADA COUNTY
PLANNING DEPARTMENT

April 4, 2022

To: Matt Kelley, Senior Planner
Nevada County Planning Commission
950 Maidu Avenue, Suite 170
Nevada City, CA 95959

RE: Denying the Idaho-Maryland Mine re-opening

Dear Commissioner Kelly,

I have lived in our wonderful Sierra Foothills since 1994. Our home off Greenhorn Road and the neighborhood in which we live, has been a joy since we arrived. Our water-source, is a pristine well 275' beneath our home, providing clean, fresh water since the house was built in 1974.

A half-a-mile away, at the bottom of Greenhorn Road, is the intersection of Greenhorn, Brunswick and Bennett roads, facing the old head-frame tower (silo) on the corner of the proposed industrial site of the often re-proposed Idaho-Maryland Mine. Each time the new Use-Permits are resubmitted to the Planning Commission and County Supervisors by Rise Gold or its predecessors since 1999, our collective neighborhood's hair stands on end! And, each time the applications are denied, we breath collective sighs of relief and hope it's the LAST time!! Not surprisingly, we have a number of serious concerns about the possibilities of the mine's reopening and the destruction of our local grounds, in favor of foreign investors, milking our lands for their own personal gains. It strikes me as odd, that we would consider allowing such a foreign mining company to arrive in our beloved and historical land, to extract our "golden ground," to feather their own nests, to no reasonable advantage to us, while then continuing to extracting over the forthcoming 80 years, incredible benefits for themselves. From nearly all perspectives, it is tantamount to allowing foreign invaders to freely extract our local wealth, and remove it from our needs, exploiting every last ounce for their own benefit. And, proposing to do this, 24/7/365, for eight forthcoming DECADES. Then they can leave US, the dirty remembrances of their intrusion into our extraordinary geological gifts. Why am I so adament?

785-1

Because of my background, I have a very deep understanding of the history of The West, including the Gold Rush, mostly because when the gold ran out, and/or met the limitations of gold mining technology, the coastal populations focused on the development of agriculture along the entire west coast instead. One venture leading into another, making California in particular, one of the wealthiest agrarian societies in the world. Today, my home is Grass Valley, and I have been a professional musician with a fifty-three year career, and produce shows here in our fair region. I grew up in the lumber business and building trades, as well, so I have an understanding of how important water and environmental security is to everyone! Also, in the 1990s, I became a member of the Auburn Gold hounds, and practiced placer mining for several years, beginning my still-growing education about gold and mining in Placer and Nevada counties.

Today, however, my neighbors and I share a deep concern for the health and prosperity of our region and its resources. Besides drought, fires and excessive development, the potential return

of gold mining, and specifically the 24/7/365 EIGHTY-YEAR proposal of mining 2,585 acres of mining rights in our roughly 3,000 acre town if Grass valley, is of great concern to everyone I know, and particularly to myself. And, not lost to many folks, is that the developer/operator of this "person" is a Canadian company, Incorporated in Nevada, and plans to take this wealth out of our region! On top of that, should he decide to give up mining at some future date, he can sell the mine to the highest bidder/country, and head home with the spoils, leaving an environmental mess for US to clean-up, which is historically the way mining companies behave.

My studies have revealed that from the century of 1848 to 1948, gold was veritably stagnant at $20. until 1932, and reached the record high price for gold at $40. at the end of WWII (1946-47). When the I-M Mine closed in 1956 (66 years ago), the price of gold was $35.20. [1] Forty-years later, in 1996, when the NC Board of Supervisors permitted Dewatering the mine for exploration, the price had reached reached $369.00, which was a record at that time. In 2015, seven years ago, gold settled at $1,060. But, today, something dramatically significant has changed, the price of gold is now percolating near $1,950.00 per ounce, or $31,200.00 per pound, five-times the value 26 years ago, which definitely has a certain Canadian mining company "licking-its-chops." (1) (https://onlygold.com/gold-prices/historical-gold-prices/)

As you are aware, in the past twenty-plus years, several prior incarnations of Rise Gold, have attempted and failed at being granted a permit to reopen, for myriad reasons. The most recent DEIR, featuring 1,069 pages, seems a deliberately overboard attempt to flood us with SO MUCH information, that many will turn-away from it. "beat them over the head with facts, so they turn-off and walk away."

Finally, In my many months of research, I have read countless books, maps, articles and dug-deeply into gold history on the Internet, as well. My larger bodies of research include sections on mapping the historic locations of claims and mines in Nevada and Placer counties. I have a small library of materials and books on these subjects. I attempted to down the DEIR, and it's 1,069 pages were too much for my computer. In attempting to read it on the county website, it crashed three times. I have attended meetings, not least of which the most recent at the Planning Commission Meeting Monday April 4th, sitting right behind you, as a matter of fact. I have been on Zoom meetings with the NID board, met with groups and individuals regarding the trouble Rise Gold is bringing. I have many times, countered and corrected Mr. Mossman's... exaggerations on their milers, which paint a very deceiving picture. I have seen him speak online, and researched his company, his press in British Columbia, studied his history. Most recently, I researched in depth the potential hazards of the mine, its operations, past troubles from books and interviews on specifically the I-M mine. I rewrote the contents of the book "Gold in Quartz: The Legendary Idaho Maryland mine" by Jack Clark, synthesizing it down to the actual history and events, without all the figures, pay-scales, etc. It was a true learning experience to walk through that history word for word, and in typing it out, I absorbed the play-by-play of its history (a copy of which I have included after this letter in case you have not read it. I did this also because I have been an author on the history of the Pacific states, from B.C., Canada to Southern California and beyond, for over 43 years as part of my career. I grew up in lumber milling in the 1970s in the bay Area where my father owned four large lumber yard/home improvement yards from 1946 to 1991. My background in Western American history helped lead me to living in Grass Valley!

So, today I am extremely concerned with the nowadays sinister idea that reopening one or more gold mines here, would be a grand disaster for the region for myriad reasons. But, in particular, I will mention here those at the top of my ongoing lists and research. However, rather than be long-winded on all this, I am enclosing a number of research articles and papers I have created, which I feel constitute the current contents of the "letter" I wish to give you today. My OWN binder is more than four inches thick with related material. But, regarding the "NEED FOR A NEW DEIR, I feel all these needs should be address scientifically and clearly, verifiably, before ANY permits are awarded, even exploratory ones beyond what they have already exercised. Thank you for your time and consideration!

Sincerely,

Thomas P. Jacobsen
P.O. Box 791
Weimar, CA 95736 (I live in Grass valley, but have maintained an office in Weimar since 1994. This is my office address and mailing address. Because I m in the art business, I do not publish my physical address.)

"Gold mining is one of the most destructive industries in the world. It can **displace communities, contaminate drinking water, hurt workers, and destroy pristine environments**. It pollutes water and land with mercury and cyanide, endangering the health of people and ecosystems. In Nevada County's case, Arsenic, Cadmium, Silica, Talc, ... I can go on at length...

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Post Office Box 791
Weimar, CA, 95736-0791 U.S.A.
patj@fruitcratelabels.com
Tel/Fax: 1.530.637.5923

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**I delivered this on Mon Apr 4, 2022 to matt kelly's office at the rood center, NC, at 4:25 PM. They accepted my BINDER with 3/4 of an inch of material and said they would "treat it like a single letter," which is what i thought/hoped they would do, and they did! In before the deadline!!!!! :) Patio*


EUREKA
FANCY PEARS
Gold Nugget
Argonaut Brand
LUCKY FIND
COLOMA ORCHARD
Placer County Mountain Fruits
STAGE COACH
ORANGES
Overland Brand
IDAHO APPLES
PIONEER
ORCHARD
ROGUE RIVER VALLEY PEARS
SURE SHOT
MOUNTAIN
BARTLETTS
OPEN TRAIL
BARTLETT PEARS
49
SOS
ROGUE RIVER
PEARS
OPEN TRAIL
LUCKY TRAIL
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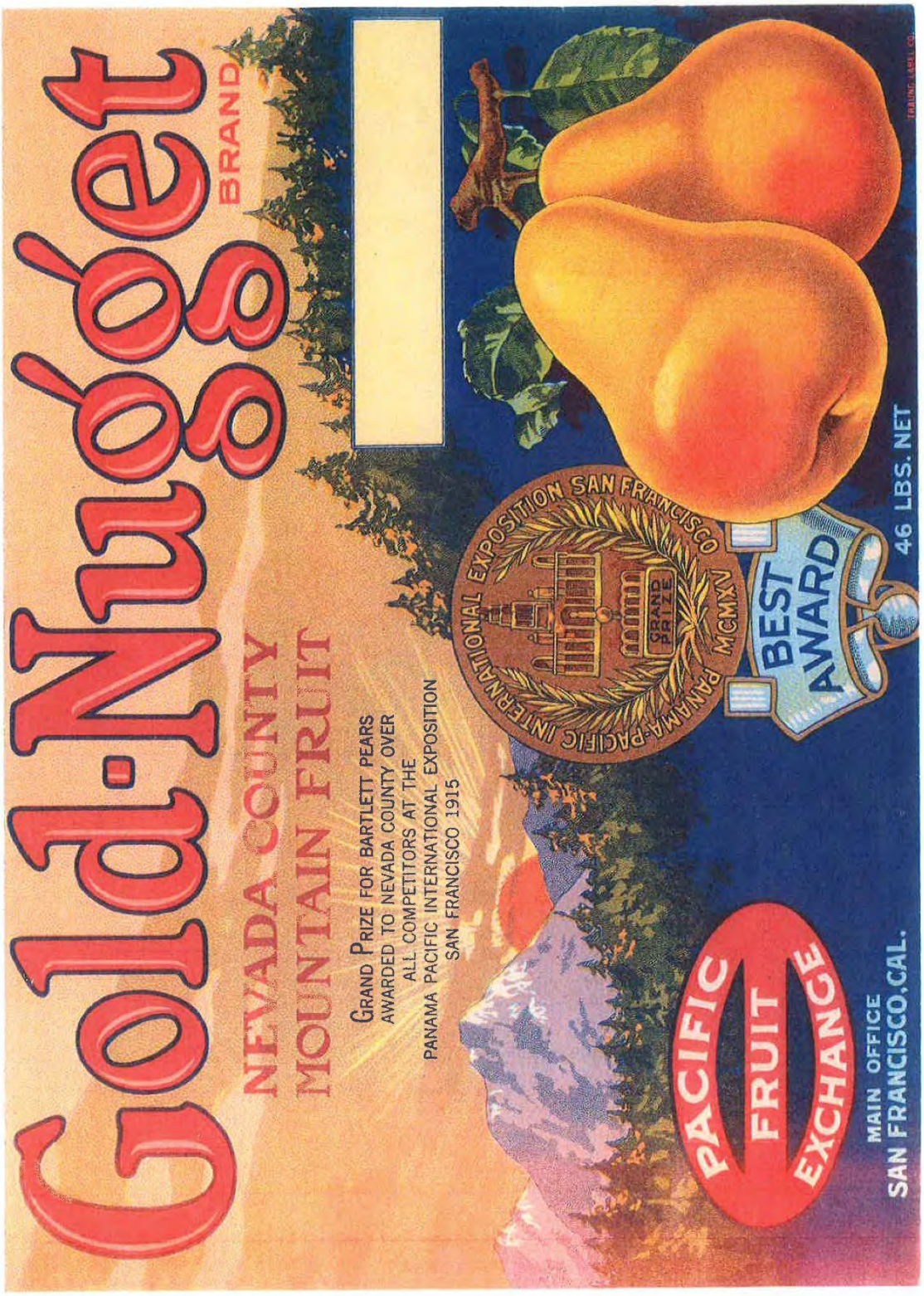
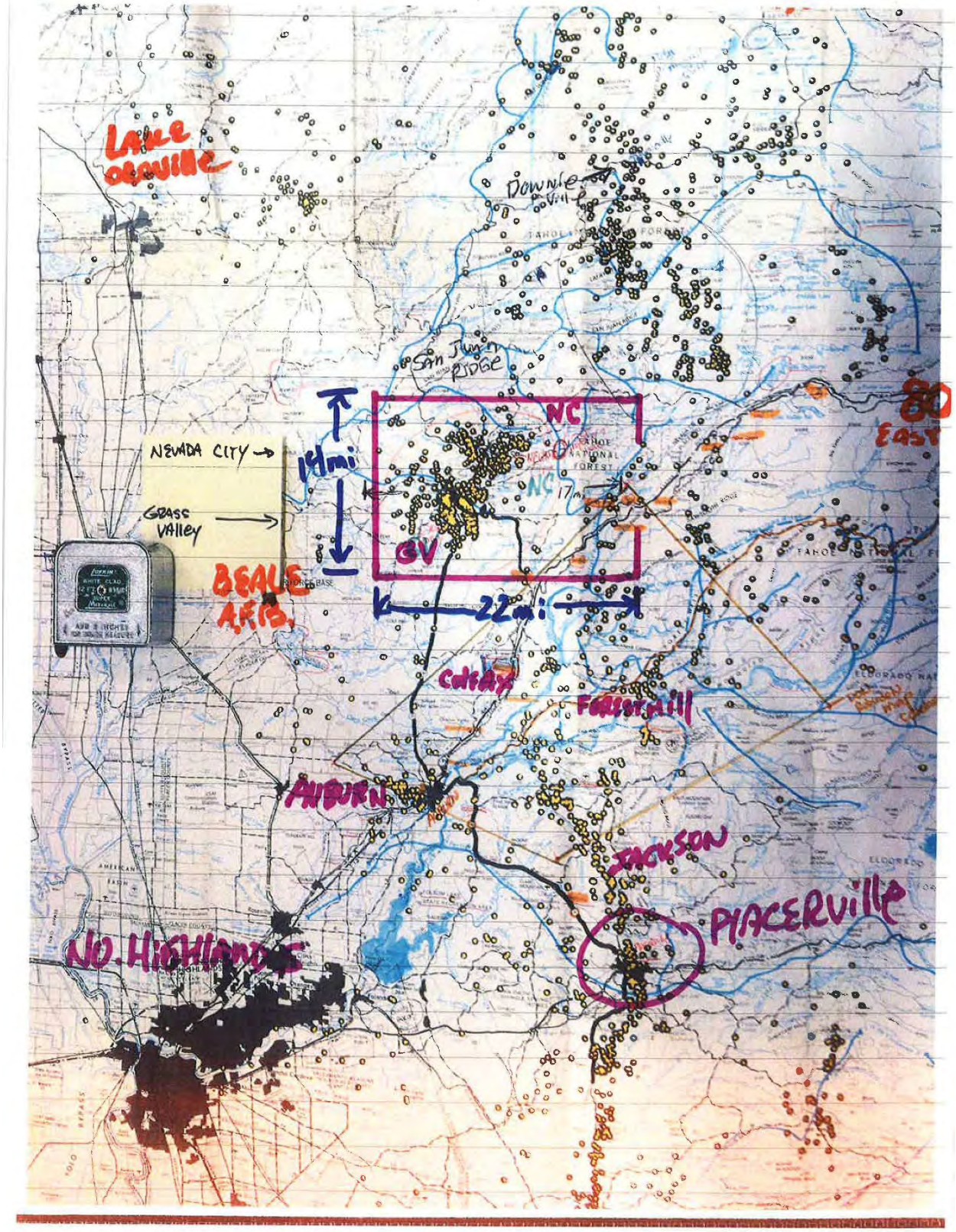
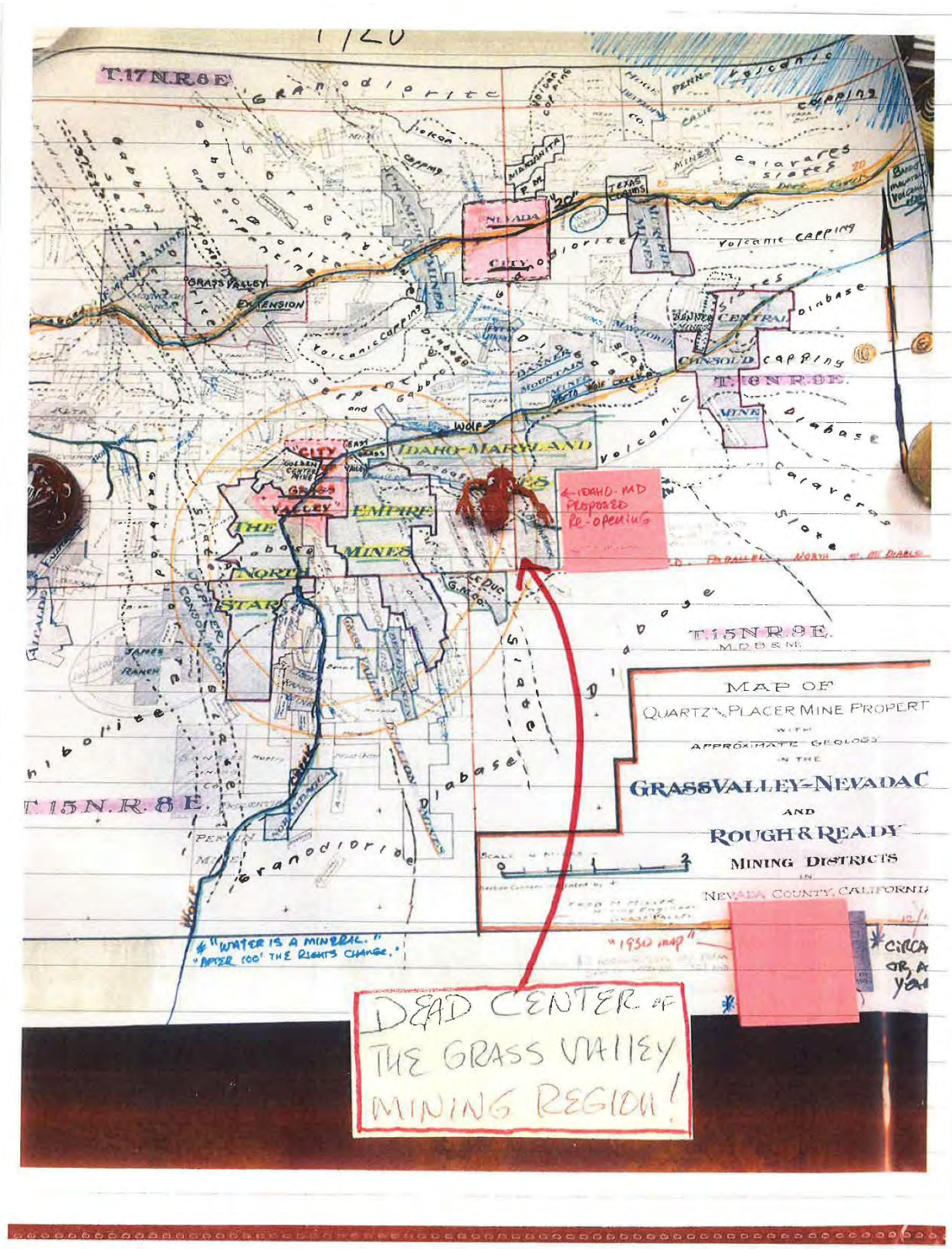
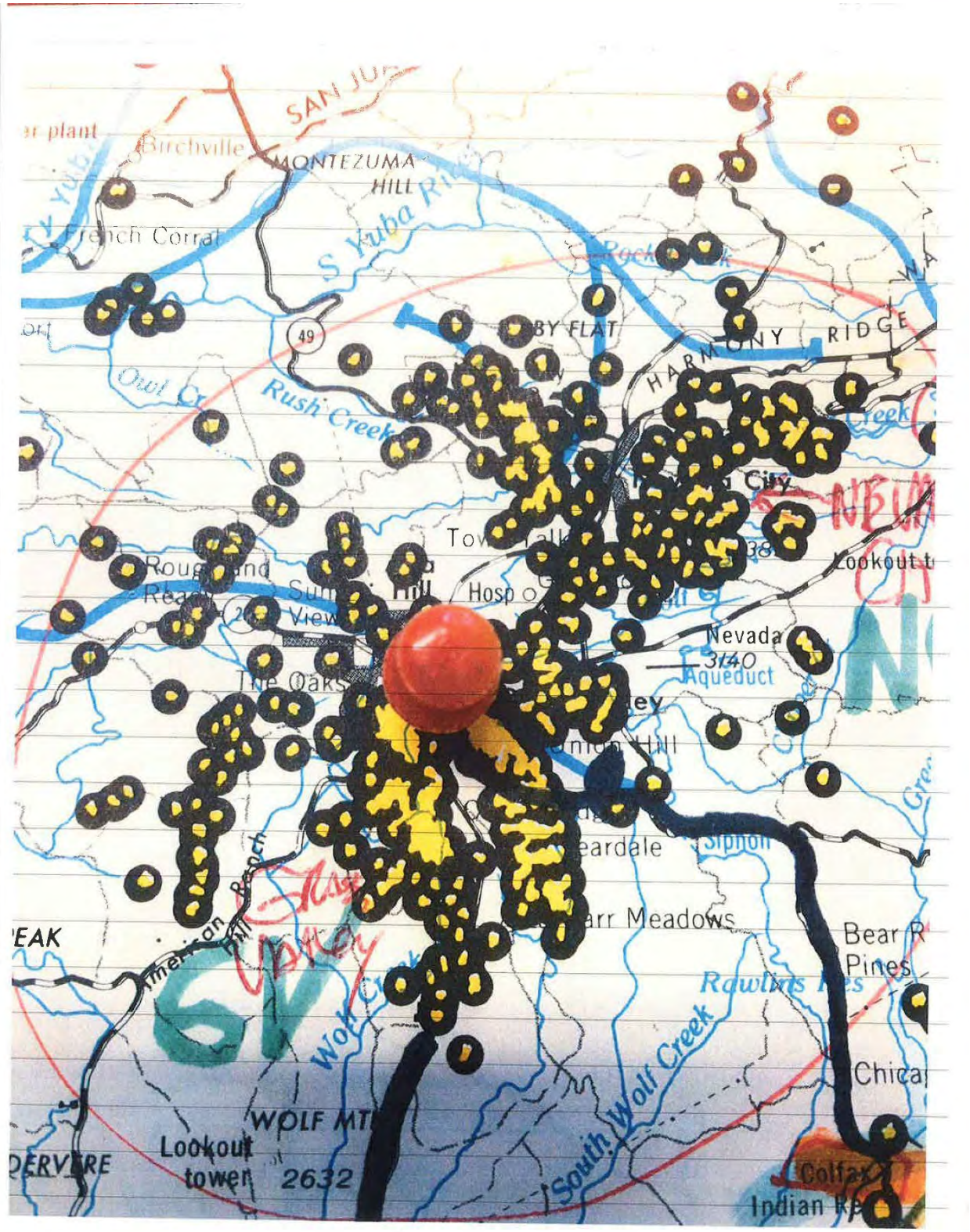
Far West
NORTHWEST APPLES
1985


Gold-Nugget
BRAND
NEVADA COUNTY
MOUNTAIN FRUIT
GRAND PRIZE FOR BARTLETT PEARS
AWARDED TO NEVADA COUNTY OVER
ALL COMPETITORS AT THE
PANAMA PACIFIC INTERNATIONAL EXPOSITION
SAN FRANCISCO 1915
PANAMA-PACIFIC INTERNATIONAL EXPOSITION SAN FRANCISCO MCMXV
GRAND PRIZE
BEST AWARD
46 LBS. NET
PACIFIC FRUIT EXCHANGE
MAIN OFFICE
SAN FRANCISCO, CAL.


L·R
TRADE MARK REG. U.S. PAT. OFF.
Highest Quality
MOUNTAIN GROWN
FRUIT
HAND GRADED
MACHINE SIZED
3000 feet elevation
MINIMUM NET WEIGHT
46 LBS. WHEN PACKED
Copyright 1926
by Loma Rica Ranch
Loma Rica Ranch
Grass Valley, California

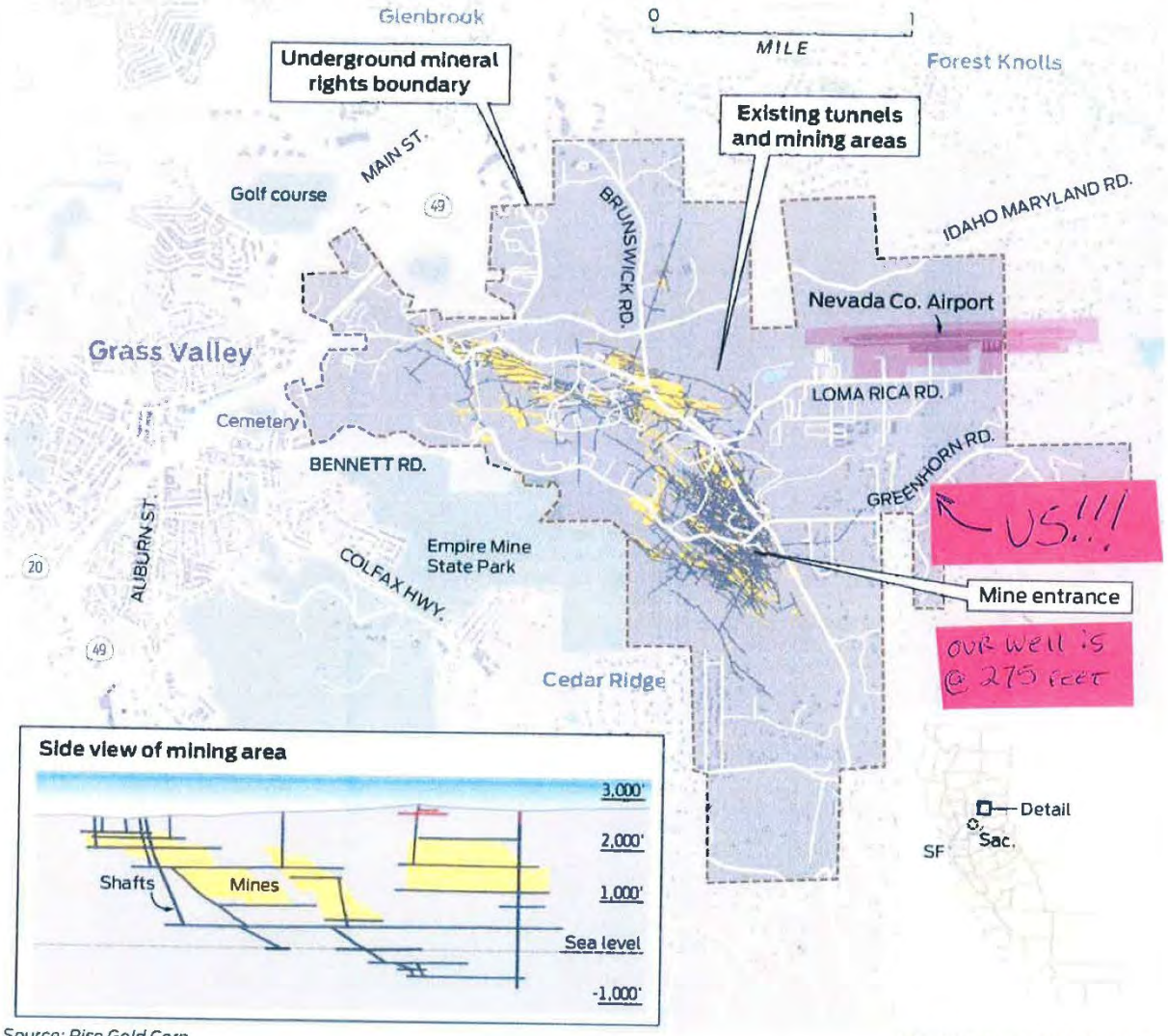

LAKE ORAVILLE
Downie Ville
San Juan Ridge
NC
NEVADA CITY
14mi
GRASS VALLEY
GV
BEALE AFB
22mi
80 EAST
COLFAX
FOREST HILL
AUBURN
JACKSON
PLACERVILLE
NO HIGHLANDS


T.17N.R.8E.
T.15N.R.8E.
T.15N.R.8E.
MAP OF
QUARTZ & PLACER MINE PROPERT
APPROXIMATE GEOLOGY
IN THE
GRASSVALLEY-NEVADAC
AND
ROUGH & READY
MINING DISTRICTS
NEVADA COUNTY, CALIFORNI
IDAHO-MARYLAND
EMPIRE
MINES
NORTH
STAR
GRASS VALLEY
NEVADA
CITY
IDAHO-MD
PROPOSED
RE-OPENING
"1930 MAP"
"WATER IS A MINERAL."
"AFTER 100' THE RIGHTS CHANGE."
DEAD CENTER OF
THE GRASS VALLEY
MINING REGION!


Birchville
MONTEZUMA HILL
French Corral
S Yuba Ri
49
Owl Cr
Rush Creek
HARMONY RIDGE
Hosp
Nevada
3140
Aqueduct
The Oaks
Lookout t
Siphon
Meadows
Bear R
Pines
Rawlins Res
Wolf Creek
South Wolf Creek
WOLF MT
Lookout tower
2632
Colfax
Indian Re

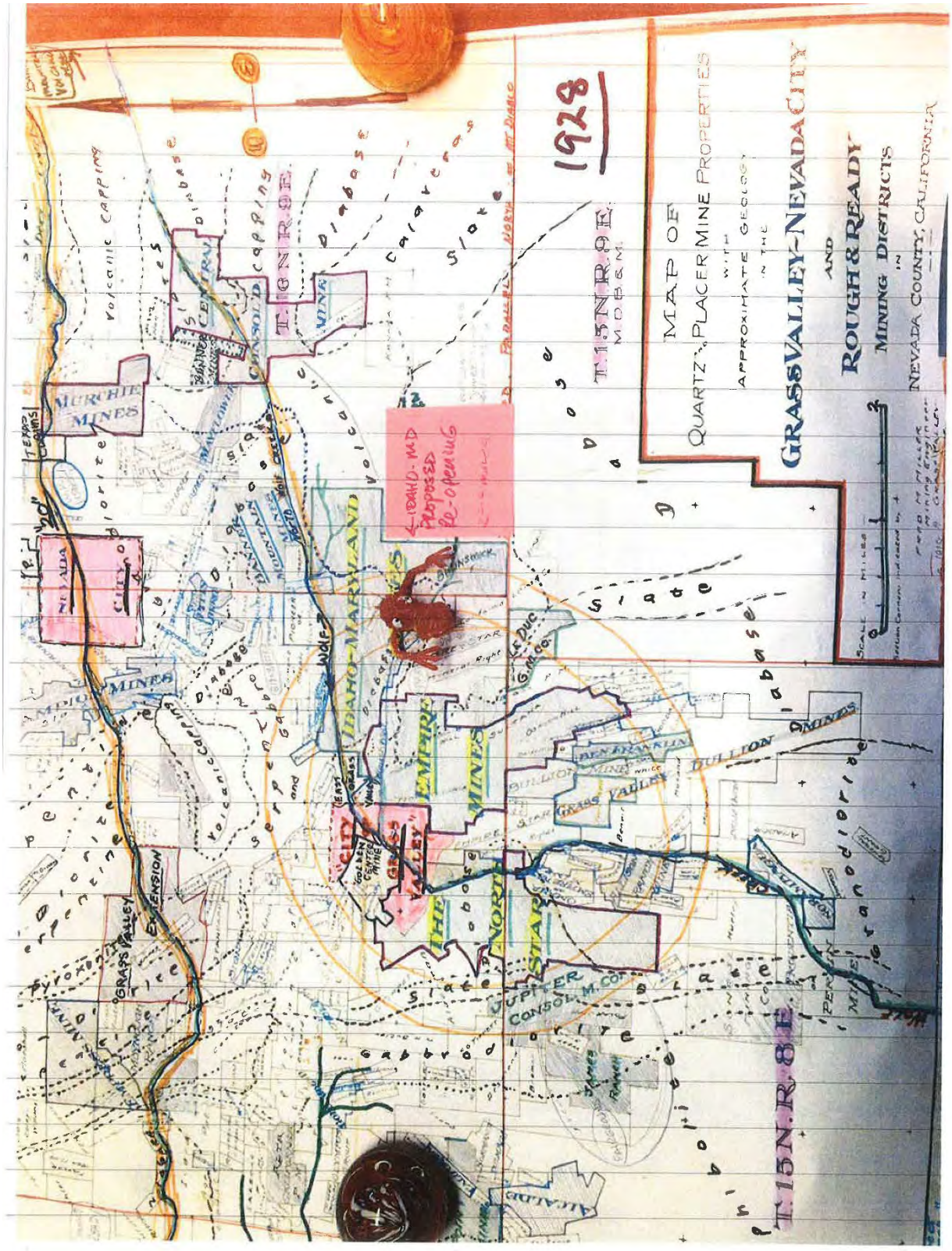
A new dig at the Idaho-Maryland Mine

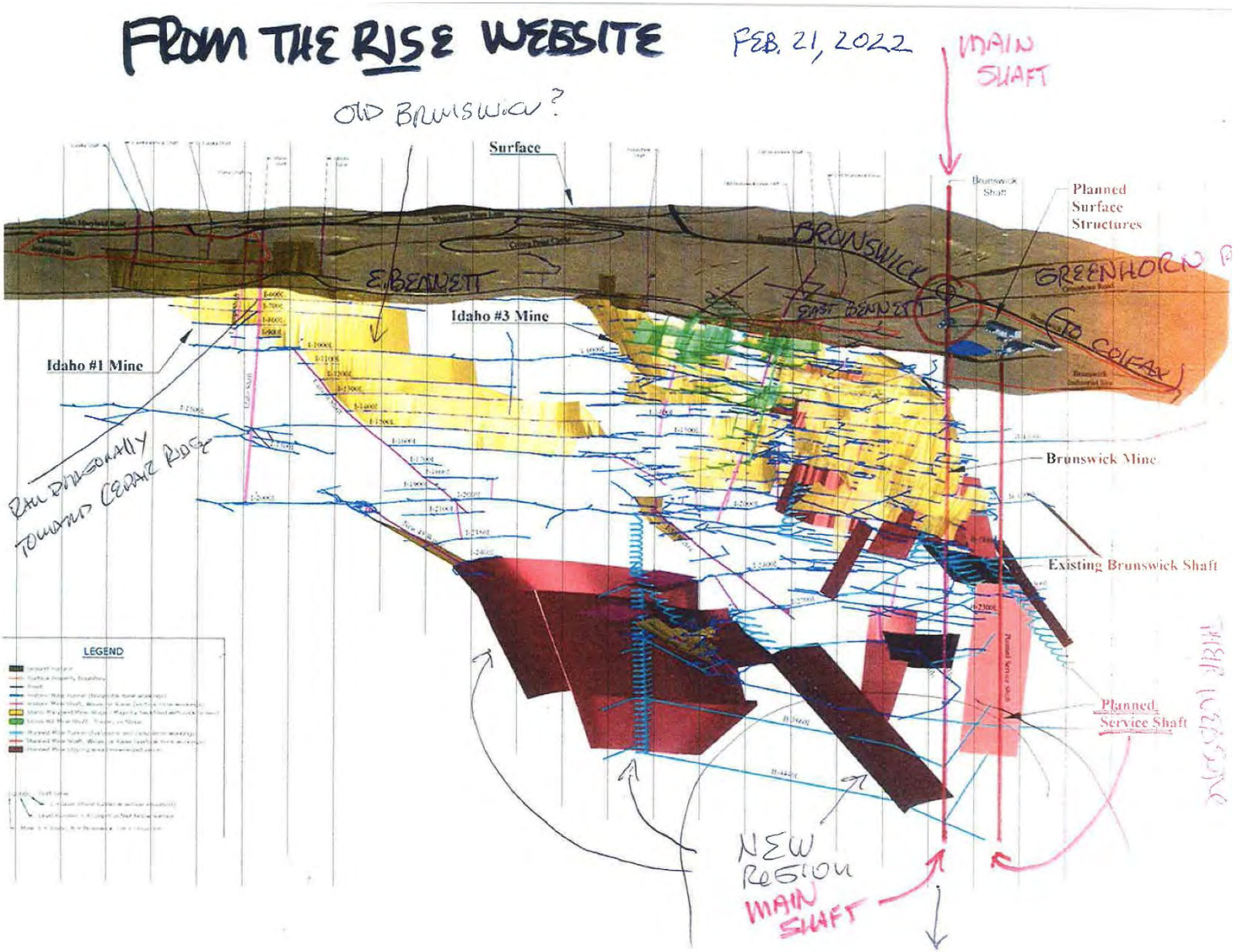
A mining company has recently acquired the land and mineral rights at the more than 150-year-old Idaho-Maryland Mine in Nevada County. The venture is seeking approval to reopen the facility and mine gold.



Source: Rise Gold Corp.

John Blanchard / The Chronicle


1928
MAP OF
QUARTZ, PLACER MINE PROPERTIES
WITH
APPROXIMATE GEOLOGY
IN THE
GRASS VALLEY-NEVADA CITY
AND
ROUGH & READY
MINING DISTRICTS
IN
NEVADA COUNTY, CALIFORNIA
T.15N.R.9E.
T.16N.R.9E.
T.15N.R.8E.
MURCHIE MINES
IDAHO-MARYLAND
EMPIRE MINES
NORTH STAR
BULLION MINES
GRASS VALLEY
CONSOL. M. CO.
JUPITER
CONSOL. M. CO.
Volcanic Capping
Diabase
Calaveras
Slate
Gabbro
Pyroxenite
Extension


FROM THE RISE WEBSITE
FEB. 21, 2022
MAIN SHAFT
OLD BRUNSWICK?
Surface
Brunswick Shaft
Planned Surface Structures
BRUNSWICK
E. BENNETT
EAST BENNETT
GREENHORN
TO COLFAX
Idaho #3 Mine
Idaho #1 Mine
RAIL DIAGONALLY TOWARDS CEDAR RIDGE
Brunswick Mine
Existing Brunswick Shaft
Planned Service Shaft
LEGEND
NEW REGION MAIN SHAFT


2022
Feb

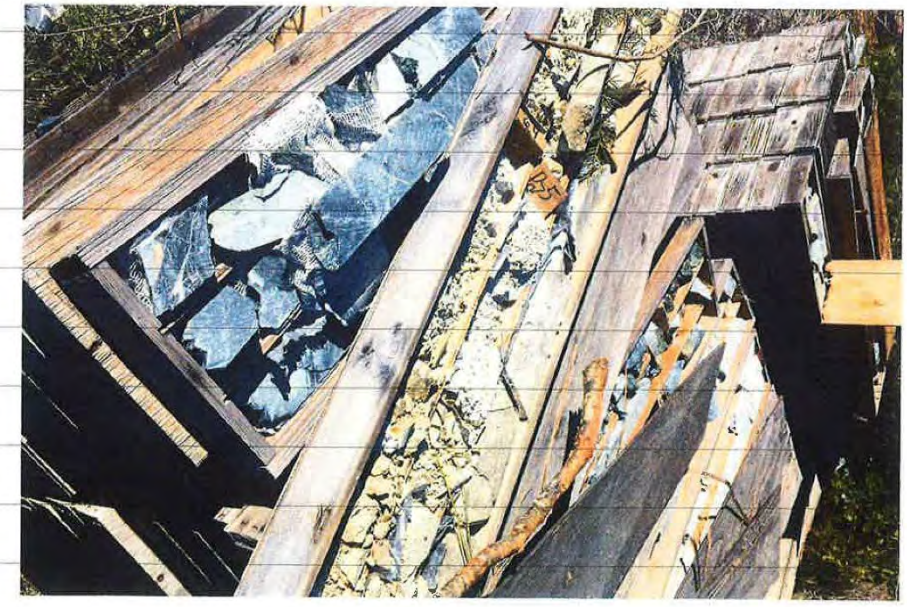




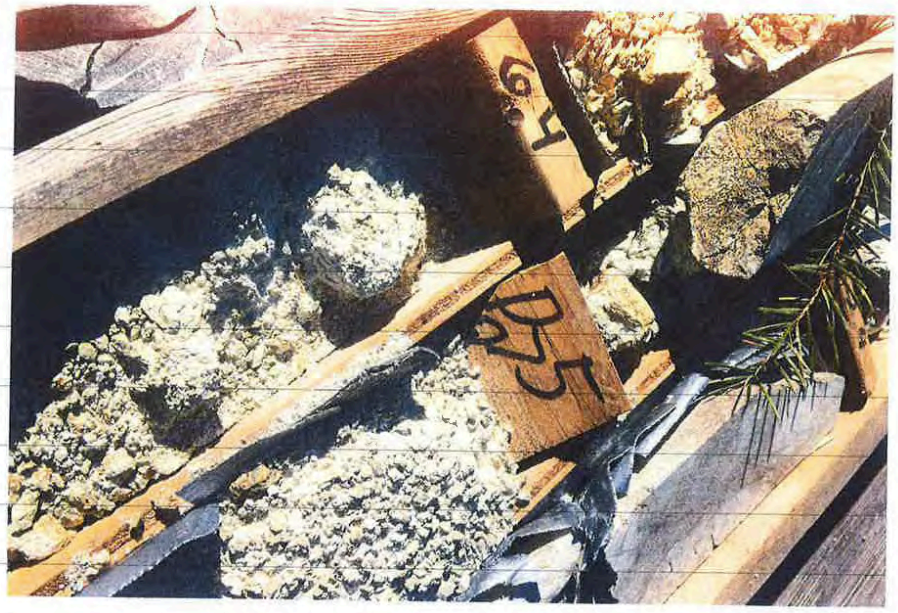
DISINTEGRATED HAND-PACK, LEFT OUT FOR PURPOSES TO JUST.

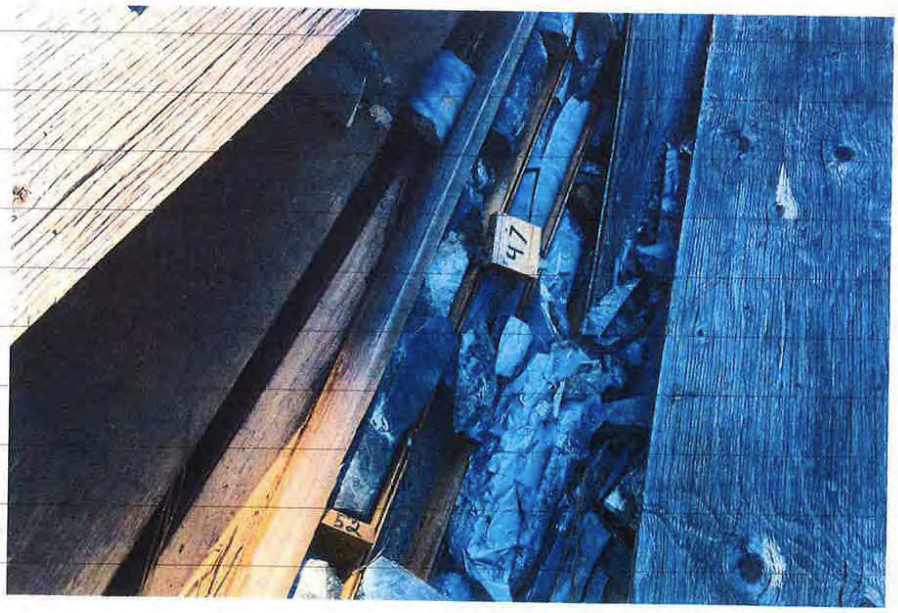


Jan 26 '22



DISINTEGRATED IN ONE YEAR



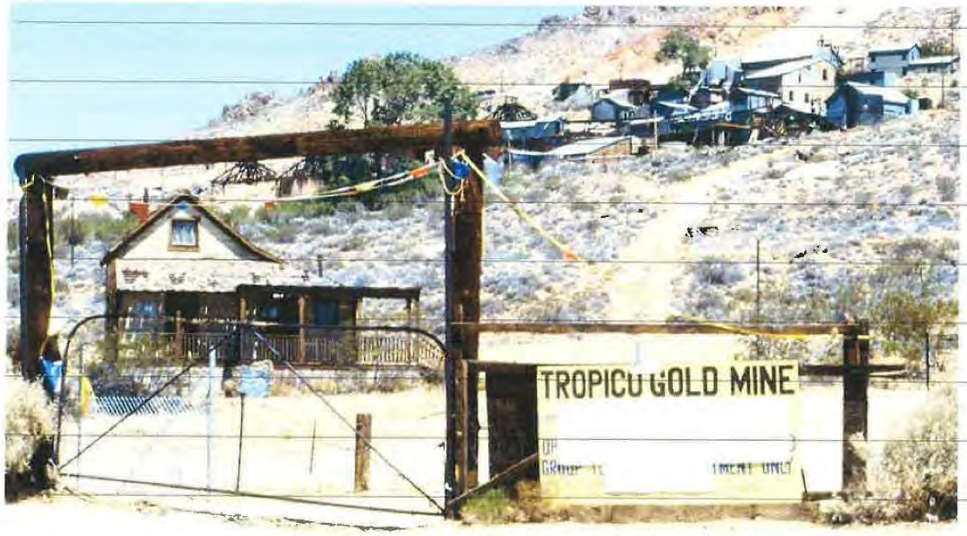


Cor 47

How California's Gold Mining Past Is Threatening its Future

Thousands of underground mines across the state linger in toxic anonymity.
BECKI ROBINS March 27, 2019

In April 2006, 32-year-old Jason Chellew was relaxing in his Alta, California home when the ground opened up beneath him, swallowing him and most of his living room. It sounds like fiction, but what happened to Chellew was actually the last chapter in a series of historical events that started with the Marshall Gold Discovery on January 24, 1848, and ended when an old gold mine collapsed beneath Chellew's home, taking his life. The incident rattled a lot of Californians, who are mostly brought up to feel proud of the state's colorful gold mining history. No one likes to think that history is hazardous, but in California it's becoming increasingly difficult to hide from the real, if belated, consequences of the Gold Rush.



Tropico Gold Mine, Ghost Town, CA. The US Bureau of Land Management estimates that there are 47,000 abandoned mines in California. Photo by Don Graham.

The Bureau of Land Management estimates that there are 47,000 abandoned mines in California — mostly in the Sierra Nevada Mountains and Klamath Mountain regions of Northern California and the Mojave and Colorado Desert regions in Southern California — but no one really knows the exact number. Many mines were never recorded or mapped, and they could be anywhere — under any home or business, abandoned but covertly menacing. And collapsing mines aren't the only threat. Mining-related chemicals like lead, mercury, and arsenic are still hanging around in the soil and water in these areas, and the process of removing those chemicals is complex and expensive.

Michelle Fuller is the Water Treatment Operator at the Empire Mine State Historic Park in Grass Valley. She works on the Magenta Drain Passive Mine Water Treatment System, which was installed in 2011 to help the park address the problem of contaminants in the water — water that comes directly from abandoned, flooded underground tunnels. Fuller is a champion of the system, pointing out its components with enthusiasm, as if admiring a water sculpture instead of a series of plastic pipes and conduits.

The Empire Mine was once the most productive hardrock gold mine in the state — today it's a popular recreational destination. The locals bike, hike, and ride horses on the 856-acre park's 14 miles of trails. Couples get married on the lawn in front of the Cotswold-style "Empire Cottage," the ridiculously named two-story estate house made of stone and redwood. In the mine yard, visitors can peer into the gaping mouth of the old mine shaft, which vanishes into impenetrable darkness, beyond which lies 367 miles of tunnels.

The Empire Mine was a functioning gold mine from the Gold Rush through the 1950s. Arsenic occurs naturally in the wall rock and gold ore, and gold mining operations released the dangerous chemical into the waste rock and mine tailings (the debris that remains after the sediment has been picked over by miners). No one pulls gold out of the Empire Mine anymore, but chemicals from past mining activity still linger in the water and soil. In 2007, park officials discovered arsenic in the park's soils. When bikers and joggers kick up arsenic-containing dust on the dirt paths, it can become airborne, and that can pose a potential health hazard to park visitors. To make the trails safe again, Fuller says the arsenic hotspots were covered with natural material, but even that presented a problem — the material had to be obtained from outside the local area, because most of the rock and soil that could be purchased locally also had roots in California's gold mining past, and it often contained more arsenic than the hotspots did.

The arsenic settles into the water table, too. Many of the mine's lower tunnels are flooded, and during periods of heavy rain the water rises and leaves the mine, entering the above-ground water system. "The water I have coming through here," Fuller says, pointing to what looks like clear, drinkable water, "that's not groundwater, that's mine water."

Fuller and her team make sure that the water is clean when it leaves the park — the Magenta Drain is a chemical-free system of pumps, settling ponds, and wetlands. But the entire region outside of the park's boundaries is subject to the same or similar mining-related contaminants. North of the Empire Mine is an old hydraulic mining area called Malakoff Diggins — also a state park. Its central feature is a high canyon wall that looks like it belongs in another part of the solar system. Malakoff's brightly colored ponds and otherworldly geography are evidence of a sinister history — the canyon wall exists because half the mountain was washed away by the high-pressure jets of water miners used to release ore-containing sediment, and the ponds bear evidence of the chemicals that helped miners retrieve gold from that sediment. "All those ponds up there are emerald blue," says Fuller. "The miners used a lot of mercury up there. That's why it's all blue."

Mercury gets into the ground, too, and is absorbed by the vegetation. A 2007 study by the National Center for Atmospheric Research found that wildfires are a significant source of airborne mercury pollution. When dry, mercury-laden vegetation burns, the mercury becomes airborne and ends up in the atmosphere, where it remains until precipitation delivers it into the waterways. As California experiences longer periods of climate change-related drought, frequent wildfires, and the mercury contamination that goes along with them, will only become a more significant problem.

This pattern of mining-related environmental risk can be seen all over the nation — in 2015, Environmental Protection Agency workers investigating water levels at the 130-year-old Gold King Mine in Colorado's San Juan mountains inadvertently released 1 million gallons of contaminated wastewater into the Animas River, turning it a bright, toxic, mustard-yellow. Crews later confirmed that lead levels in the polluted waters were 100 times higher than what is considered safe, but lead isn't the only heavy metal in the spill — there's also arsenic, zinc, and copper. EPA officials say they plan to take tissue samples from deer to help them assess the actual damage to the region's wildlife population.

And then there are the sinkholes — rare, but still troubling. After a period of heavy rains in January of 2017, a sinkhole opened up behind a Grass Valley car dealership. Seven stories deep and 80-feet in diameter, the official

cause was the failure of a seven-and-a-half foot underground culvert, but plenty of residents thought there might be more to it than officials were letting on. Social media was full of speculation that the sinkhole was caused by a collapsed mine shaft, and with thousands of unmapped mines lurking underground, that's a pretty ominous theory.

Whatever the cause, sinkholes like these are a grim foreshadowing for what is certain to be a tumultuous future for California, which is expected to see longer, more devastating droughts followed by periods of heavy rains and flooding. Much of California's gold mining history still lurks beneath the surface, and while cleanup efforts like the Magenta Drain are critical initiatives, they only occur in known problem areas like the Empire Mine — leaving thousands of underground mines to linger in toxic anonymity.

The settling pond that is the heart of the Magenta Drain system is almost picturesque, with a fountain of water in the center and a pair of black and gray Canadian geese floating on the surface, oblivious to the heavy metals settling beneath them. The system is an impressive piece of engineering, but in the context of the whole state of California, it's a little bit like trying rebuild a war-torn city with one hammer and a handful of nails.

Fuller is clearly proud of the system's success, but even she acknowledges that it's just one small fix in an otherwise enormous statewide problem. The Gold Rush's footprint is broad, and the chemicals that linger in the ground call everything into question, even the safety of eating wild blackberries and the figs that grow in places with roots in California's gold mining past. "The list goes on and on," she says. "The miners left a mess behind all over California. It will take a lot to clean it all up."

(https://www.earthisland.org/journal/index.php/articles/entry/how-californias-gold-mining-past-is-threatening-its-future/) Becki Robins: Becki Robins is a freelance writer who lives with her family in rural Northern California. She writes about science, nature, and history.

"Gold mining is one of the most destructive industries in the world. It can **displace communities, contaminate drinking water, hurt workers, and destroy pristine environments**. It pollutes water and land with mercury and cyanide, endangering the health of people and ecosystems. - Google

"Will gold mining ever stop? Based on known reserves, estimates suggest that gold mining could reach the point of being economically unsustainable by 2050, though new vein discoveries will likely push that date back somewhat. "

What is Grass Valley famous for? During the goldrush countless tin miners immigrated from Cornwall, England and settled in Grass Valley to try their hand at gold mining Grass Valley, **home to two of the most lucrative mines in California: The Empire Mine and the North Star Mine**.



GRASS VALLEY, NEVADA COUNTY

"WHAT ARE THE 100 MOST COMMON USES FOR GOLD IN MODERN INDUSTRY!"
(AS OF FEBRUARY 27, 2022)

*(This is a hybrid document of dozens of website statements answering this question. I cannot site all the sources, but, google provided all of them.)

- Gold uses in everyday life (https://www.hellogold.com/6-gold-uses/) In the past 2,725 years.....
- Gold in electronics. As you know, gold is an excellent conductor of electricity. ...
- Gold in dentistry. Interestingly, gold was used in dentistry as far back as 700 B.C.! ...
- Gold in the medicinal industry. ...
- Gold in aerospace technology. ...
- Gold as awards and medals. ...
- Gold leaf and glassmaking.

Wealth protection and a financial exchange. One of the oldest uses of gold is for coins, and other financial assets. ...

ABSTRACT:
Approximately 11 percent of all gold produced is used in industry. Because of its inherent properties, gold is used in the **medical, electronics, automotive, defense and aerospace industries**. It is also increasingly used as a catalyst in many industrial processes. Gold has many medical applications.

Top 5 uses for gold
1) Wealth protection and a financial exchange. **One of the oldest uses of gold is for coins, and other financial assets. Purchased by governments, central banks, financial institutions and private investors, gold is used as a physical store of wealth. The rarity of the yellow metal has helped maintain its value throughout the ages. Golds ability to maintain value while other assets are dropping means it is stored, as pure gold bars and coins, in huge vaults – or under floorboards – for its investment value alone.**

The exact amount of gold bullion held for investment purposes is difficult to put an exact figure on. As well as national reserves, individuals can also own investment bullion. It is believed that the US holds the largest reserves but there has not been a physical full audit since Eisenhower's time in the 1950's. Germany is believed to have the second largest reserves but both Russia and China are adding to their stockpiles at an increasing rate.

2) Jewelry, adornments and medals. Jewelry, and other decorative gold products, account for the largest global use of gold. China and India are the two largest consumers, taking over half of all global production in 2018. In that year, over 1,200 tonnes of gold were consumed for jewelry in China, and over 500 tonnes in India. Whilst no doubt admiring the beauty and prestige of gold jewellery, many of these buyers will also have an eye to its investment value.This precious metal has historically been used as a symbol of luxury, superiority and wealth. Besides jewelry, gold is used to increase the value of a huge range of decorative items, such as medals and badges. Gold-leaf has traditionally enhanced artworks and, recently, artist Maurizio Cattelan has even exhibited a gold toilet in the Guggenheim museum in New York!

3) Electronics. Gold does not corrode, is a great conductor of electricity, and is highly resistant to heat. Physically, it is a soft, pliable metal and can be easily stretched or plated into thin coatings. For these reasons, gold is perfect to use in electronics, particularly for

cables and connectors. With consumer technology growing annually, there is increasing demand from the electronics industry, particularly in cell phones. In 2018, electronics consumed over 1,400 tons of gold, and in 2017, it accounted for 34% of gold used in the US.

4) Space exploration. Closely allied with electronic uses, space exploration and satellites are another growing consumer of gold. Besides the numerous electronic components, thin coatings of the metal are used in for shields and visors, and golds dependability is essential for the high-risk situation of space travel and exploration. Gold particles reflect infrared radiation from the sun, helping to keep temperatures down on darker panels and visors. Gold can also be used as a lubricant, and the volatility of organic lubricants makes them unsuitable to the extreme temperature ranges and high radiation of space.

5) Medicine and dentistry. Because it is non-reactive and non-toxic, gold has for many years been used in dentistry and medicine. New applications are being discovered every year, for example in prosthesis, where longevity is essential. Small amounts of gold are also **injected as a treatment for Rheumatoid arthritis and muscle damage,** and micro-particles are being used in the **treatment of some cancers.** Gold has even been used in Covid 19 tests!

"THE PRICE OF GOLD HAS ROCKETED DURING THE PANDEMIC, BUT MINING IT IS GETTING MORE DIFFICULT. CHRIS BARANIUK REPORTS ON CHALLENGES AND CONTROVERSY AT ONE OF THE UK'S BIGGEST PLANNED MINES."

"For 1,000 days, the caravan stood with banners and placards pinned to its side: "We are not afraid. This is our land. This is our home. We will die for it." Irish flags flutter in the wind. This is the **anti-gold mine protest site** set up by a group of locals in County Tyrone, Northern Ireland.

With 460 million-year-old veins of gold strewn hither and thither in the rock deep underfoot, the prospect of a mine in Curraghinalt, in a remote corner of the Sperrin mountains, has been talked about for decades – but it has never yet materialised. A recent application by a mining company to extract the seams of precious metal, has brought the prospect closer still. If successful, the firm says it could bring new jobs and money to the area. But many here want to keep things the way they are.

"I devote all my time to this campaign, I just feel it's our future," says Fidelma O'Kane, a retired social worker and lecturer who is concerned about the potential environmental impacts of the mine.

"My main worry is that the water will be poisoned, the air will be poisoned, the land will be contaminated – and ultimately people's health will suffer," she adds, explaining that she would never accept a mine, of any kind, in this area.

The company hoping to extract precious metals here, Dalradian Gold, says that it has put in place a swathe of environmental safeguards, and promises several economic benefits for locals. Still, **the online planning proposal for the mine** has attracted tens of thousands of comments, mostly negative, and a public inquiry will now take place to decide what will happen next.

Some in the nearby settlement of Gortin have objected to the planned gold mine (Credit: Alamy)

Heralded by some as a potential boon for Northern Ireland, where jobs and investment opportunities stagnated during the 30-year period of conflict known as the Troubles, experts say Curraghinalt could become home to the largest gold mine in the UK, were it to go ahead.

The question now hovering over the rolling Sperrins is, what is more valuable: keeping the gold in the ground, or taking it out?

This query could hardly be voiced at a more pivotal moment. The price of gold rocketed during the pandemic, spurring renewed interest in excavation projects and even an **illegal mining boom in parts of the Amazon rainforest**. Yet gold is proving ever-more difficult to release from the ground. The technical challenges may be well known, but environmental protests and local politics are less predictable. At what point does mining gold stop being worth the effort?

You may also like:

- **The controversial plan to fill a mine with nuclear waste**
- **Inside the hunt for a million-dollar haul of ocean gold**
- **The gold mine at the end of the world**

Last year, global gold production fell by 1%, the first decline in a decade, according to the World Gold Council, which promotes the gold industry. Some analysts argue we have reached "peak gold" – which means that the maximum rate of extraction has passed and the production of gold will continue to fall until, eventually, mining for it shall cease entirely. However, demand for the stuff shows no sign of slowing down.

"It's kind of a perfect storm," says Matt Miller, vice president of equity research at CFRA Research, an investment analysis company. "Or, a better way to say it is, the fundamentals for gold may never be stronger than they are now." According to CFRA, about half of the world's gold, excluding that still buried in the ground, is used in jewellery. As for the other half, one quarter is held by central banks and a final quarter is owned by private investors or used in industry.

Miller is among those who believe we have reached peak gold. The price of a single ounce of the glittering yellow metal breached $2,000 (£1,550) this summer and still rests comfortably above $1,900 (£1,470). Twenty years ago, the same ounce would sell for less than a quarter of that amount. The latest surge, following the emergence of Covid-19, has been linked to weakening currencies, including the US dollar. Governments are borrowing huge sums to pay for their pandemic response plans and printing money to fill the gap, say analysts, which means that the value of currency has become more volatile. Gold on the other hand is viewed as a stable asset, of which there are finite amounts, meaning that investors deem it trustworthy.

But Covid-19 has also caused disruption to gold mining operations themselves and supply is not likely to bounce up to meet rising demand any time soon. As such, the gold mining industry is actually sitting on the makings of a "major crisis", argues Miller. "My view is that gold demand will continue to trend upwards," he says. "More and more of that is going to come from the recycling, which basically means that gold is trading hands."

He predicts that recycling old jewellery, coins or even the seemingly miniscule amounts of gold in the circuit boards of electronic devices, will become an increasingly significant source of the metal in the future. CFRA's data suggests that around 30% of the world's gold supply in the past 20 years was actually recycled, not mined. Refineries that recycle "scrap" gold – old jewellery, coins and bars – do use toxic chemicals and energy in their processes, but some environmental impacts may be much lower than mining. **One recent study of gold refineries in Germany** found that, kilogram for kilogram, the production of 99.99% pure gold via recycling was 300 times less carbon intensive than mining it from underground or open pit mines.

This means that obtaining one kilogram of recycled gold would produce 53kg of CO_2 equivalent – but to mine a kilogram of the same material would cause 16 tonnes of CO_2 equivalent to be emitted. Recycling scrap gold from electronics fell in between the two but was still better than mining – at one tonne of CO_2 equivalent for every kilogram of gold turned out.

Like any large-scale industrial operation, gold mining can also have local effects on the environment. Public opposition to gold mines in some parts of the world has become a barrier to gold production, says Miller. Such resistance does not only exist in Tyrone. Take the Pascua-Lama mine in Chile, for instance. **After years of protests from local activists on environmental grounds**, the project was halted by regulators.

Gold is in high demand, but supply from mines is dwindling (Credit: Charles O'Rear/Getty Images)

But where gold mines have become established, they can become giant operations. **The world's largest** produce many tonnes of gold annually and the biggest of them all, Nevada Gold Mine in the US, churns out more than 100 tonnes every year. Even smaller gold mines can support the livelihoods of many people within the communities that bloom around them. Take the city of Val d'Or (Valley of Gold) in Quebec, Canada. There's been a town there ever since gold was discovered in 1923. Various other metals including copper and lead are now also extracted in the area and a surplus of mining jobs has **attracted people to Val d'Or in recent years**. The town's ice hockey team, the Foreurs, even has a **mascot with a hard hat named "Dynamit"** – a reference to the dynamite used to blast away rock in mining.

Political barriers As for Curraghinalt, it was bloodshed that kept the gold in the ground for many years. During the Troubles, several political and sectarian groups in Northern Ireland turned to violence, carrying out shootings and bombings, for example. So when one company eyed the potential for a mine at

Curraghinalt in the 1980s, it struggled to obtain a permit for explosives, given the security risks of keeping them on-site at the time. But a decade later, Curraghinalt seemed to promise a more hopeful future, remembers **Adrian Boyce**, professor of applied geology at Scottish Universities Environmental Research Centre. Around the time of the Good Friday Agreement (the political accord signed in April 1998 that helped bring an end to the Troubles), Boyce and colleagues took part in an initiative to study the geology of Curraghinalt and assess its commercial potential. "It was really a fresh hope for the people of Northern Ireland and that's the impact that I saw for it," he recalls. "At a time when, you know, not a lot of people were investing in Northern Ireland."

He mentions the Omagh bombing, in which a group calling itself the Real IRA detonated a car bomb on a Saturday afternoon in August 1998, killing 29 people, including a woman who was pregnant with twins. Omagh is a 20-minute drive from Curraghinalt. In the minds of some, the economic opportunities of a brand new gold mine offered Northern Ireland a chance to escape the horrors of the past – and still offers the local area economic hope for the future.

After protestors objected to Dalradian's proposed use of cyanide, the company dropped that plan (Credit: Alamy)

Back in the 1990s, it was the price of gold that ultimately stymied the mine's prospects, says Boyce. But that is no barrier now. And, he says, the size of the mine – Dalradian estimates it could produce 130,000 ounces (4 tonnes) annually for 20 years or more – makes it unique in the UK.

"For gold, Curraghinalt is far and away the biggest gold mine that's ever been found in the UK," says Boyce. "It dwarfs everything else."

Yet the story of Curraghinalt speaks to the challenges of industrial gold mining in 2020, especially when operating near existing communities in an area of natural beauty. The mine is situated in a fairly remote part of Northern Ireland surrounded by farms and wilderness. Omagh, for instance, has a population of fewer than 20,000 people.

Since 2009, Dalradian has been excavating samples from below ground at its site in Curraghinalt while promoting plans for the mine to locals. The proposals include building an underground mine, rather than an open pit-style project, and extracting ore that would be processed partly in Tyrone, partly overseas.

Following fierce opposition, in 2019 Dalradian **dropped its plan to use cyanide at the site**. In some gold mining operations, solutions containing cyanide are used to dissolve gold from ore mined out of the ground so that the metal can be extracted and collected. Dalradian also says it has reduced water usage by 30% and gas emissions by 25% as part of its aim to become Europe's first carbon neutral mine.

But campaigners continue to express concerns that chemicals could be washed into nearby rivers and harm local wildlife. Pollution from the mine could also negatively affect people's health, they claim. And they also fear that a large heap of "tailings" – waste material extracted from the mine and left aboveground – would blight the area's scenery.

BBC Future had arranged to tour Dalradian's site in Tyrone but the company cancelled the visit two days before it was due to take place without explanation.

In a statement, a spokesman for Dalradian said: "This is a safe and environmentally responsible project which will emulate the successes of other modern mines in Europe."

The company says it has listened to the community, offering tours and changing its mining processes when concerns were raised.

"People can also be assured that the project is being scrutinised by an independent, robust planning process and that it has been designed to meet exacting standards. We've held around 100 meetings with

regulators so far and the local Public Health Agency has made no objection to the project on public health grounds."

And regarding the tailings: "The dry stack will have an average thickness of 17m (56 feet), will be replanted during operations, is located in a natural hollow and will be blended into the local landscape."

Human activity in the Sperrins dates back thousands of years (Credit: Alamy)
In a recent application for permission to discharge materials including heavy metals into a nearby stream, Dalradian also mentioned corrosive substances such as sulphuric acid and sodium hydroxide. On this point, the spokesman said, "Although it's not expected that they will be used routinely, as they will be stored on-site they must be listed in the discharge consent."

A treatment plant would be used for water management, he added, and noted that the mine offered a "massive opportunity" at a time when Northern Ireland's economy faced uncertainty over Brexit.

While campaigners like O'Kane say they will not accept the mine under any circumstances, there are certainly some who would. It is difficult to get a sense of exactly how many in Tyrone are for or against. The Northern Ireland Department for Infrastructure planning portal contains more than 41,000 public comments about Dalradian's proposals, more than 90% of which are objections. When asked by BBC Future why many of these responses appeared to be duplicates, the department said it believed the figures were an "accurate summary" of representations received.

Duplicates can arise for a number of reasons, a spokesman said: "They can relate to individuals making a representation on more than one occasion given there has been various amendments to the proposal."

With a public inquiry now looming over the plans, it's up to the authorities to investigate and represent the interests of local people before coming to a decision about whether the works ought to go ahead, suggests Boyce. "Let the politicians do what politicians are paid to do," he adds.

In recent years, across the Irish Sea in Scotland, local objections were raised over plans for a different mine, at Cononish, in Loch Lomond National Park. Boyce notes that environmental concerns were voiced there, too, but ultimately the project gained support and was granted planning permission. The first gold from the mine **could be produced as early as November**.

A mine at Curraghinalt that proved to be productive would certainly attract interest from investors, argues Chris Mancini, a research analyst at Gabelli Gold Fund, which invests in gold. And he argues that it would be safe, environmentally speaking.

But it won't do for some. For Fidelma O'Kane and her fellow campaigners, the mine has become anathema – a threat to the very character of the place where they live.

"The area is a beautiful area, it's designated an Area of Outstanding Natural Beauty," insists O'Kane. "We don't want it industrialised with heavy industry. "The clean, green image of our country would be gone forever."

Whatever happens next at Curraghinalt, there's no doubt that Dalradian's efforts have sparked many discussions locally about what people would be willing to accept. It's the sort of debate that could well become more common if the price of gold remains high and companies seek out small but nonetheless lucrative gold deposits in places that may have little or no tradition of gold mining. Then again, if we really have reached peak gold, the rush might not last very long." (END)

SMITHSONIAN MAGAZINE (https://www.smithsonianmag.com/science-nature/environmental-disaster-gold-industry-180949762/)

SCIENCE

The Environmental Disaster That is the Gold Industry -- The mining industry has had a devastating impact on ecosystems worldwide. Is there any hope in sight? -- BY LASTAIR BLAND, FEBRUARY 14, 2014

(The 13,000-foot high Grasberg mine contains the largest single gold reserve in the world, and the largest copper deposit as well. © George Steinmetz/Corbis) PHOTO CREDIT

TEXT: A global campaign to boycott what activists are calling "dirty gold" gained its 100th official follower three days before Valentine's Day.

The pledge was launched in 2004 by the environmental group Earthworks, which has asked retail companies not to carry gold that was produced through environmentally and socially destructive mining practices. Eight of the ten largest jewelry retailers in the United States have now made the pledge, including Tiffany & Co., Target and Helzberg Diamonds. The No Dirty Gold campaign is anchored in its "golden rules," a set of criteria encouraging the metal mining industry to respect human rights and the natural environment.

While the list of retailers aligned in their opposition to dirty gold continues to grow longer, most gold remains quite filthy. The majority of the world's gold is extracted from open pit mines, where huge volumes of earth are scoured away and processed for trace elements. Earthworks estimates that, to produce enough raw gold to make a single ring, 20 tons of rock and soil are dislodged and discarded. Much of this waste carries with it mercury and cyanide, which are used to extract the gold from the rock. The resulting erosion clogs streams and rivers and can eventually taint marine ecosystems far downstream of the mine site. Exposing the deep earth to air and water also causes chemical reactions that produce sulfuric acid, which can leak into drainage systems. Air quality is also compromised by gold mining, which releases hundreds of tons of airborne elemental mercury every year.

Gold has traditionally been a gift of love, and, not surprisingly, jewelry sales spike around Valentine's Day. According to a recent survey released by National Jeweler, about 20 percent of Americans who planned to give a Valentine's Day gift this year said they would be buying jewelry—sales estimated to total about $4 billion. Thus, activists see Valentine's Day as a prime opportunity to educate consumers and stifle the trade of dirty gold. Payal Sampat, Earthworks' director of the No Dirty Gold campaign, wants consumers to understand the back story of the gold industry. This, she believes, would spur an improvement in mining practices.

"We believe gold and metal mining can be done much more responsibly," Sampat says. "It's feasible, but consumers need to think about the impacts they have when they buy jewelry."

But the demand for gold is tremendous now. Several months ago, gold's value hit $1,800 an ounce. It has since dropped to roughly $1,300—though that's still five times its price in the late 1990s. The money to be made at all levels of the industry, from laborers knee-deep in mud to executive officers reaping thousands of dollars a day, creates powerful incentive to find gold, even though doing so may now be harder than ever. Alan Septoff, communications manager for the No Dirty Gold campaign, says that easily accessible

gold has become scarcer and scarcer through time. "What we have left in most mines is very low-quality ore, with a greater ratio of rock to gold."

This, he explains, makes the energy required to mine that gold—and the waste and pollution produced in the process—proportionally greater and greater. In other words, dirty gold is only getting dirtier. What's more, gold that cannot be traced back to some level of deforestation, air and watershed pollution, and human injury and death is virtually nonexistent, according to Septoff. "There is no such thing as clean gold, unless it's recycled or vintage," he says.

But James Webster, the curator of mineral deposits at the American Museum of Natural History, says the story is not as dark and one-sided as some may spin it. A clean gold mining industry is indeed possible, he says. Moreover, the industry is not as destructive at it may seem. Some states have strict—and effective—regulations on the handling of mine waste and runoff, Webster says. "Cyanide is not as nasty/scary as it may sound," he wrote in an email. "Its half-life is brief in the presence of sunlight."

Yet the Environmental Protection Agency has reported that 40 percent of watershed headwaters in the western United States have been contaminated by mining operations. Many of these are tiny sites, and there are, overall, roughly 500,000 defunct metal mines in 32 western states that the EPA has plans to clean up. Remediation of these sites may cost more than $35 billion.

One of the largest open pit mines is located near Salt Lake City—the Bingham Canyon Mine. The deepest mine in the world, it is about 4,000 vertical feet from its rim to the bottom. Bingham Canyon is known as a copper mine, but the site yields gold, too. More than 600 tons of gold have come out of the mine since its opening in 1906, and every year, $1.8 billion worth of metals are produced here.

Another infamous American mine is the Berkeley Pit, in Montana. This mine made the nearby town of Butte rich and prosperous for a time, but the site was eventually exhausted of riches—including copper and gold—and retired. In the decades since, water has seeped into the Berkeley Pit and filled the mine, and today it contains one of the most lethally polluted lakes in the world. The toxic, acidic water killed 342 snow geese that landed here in 1995. The water, many people fear, will eventually taint the region's groundwater supply.

The Grasberg Mine, in Indonesia, is one of the largest gold mines in the world and is owned by American company Freeport McMoRan. The Grasberg Mine is also located smack in the middle of Lorentz National Park, creating such a huge scar on the Earth that can be seen from space. The mine dumps about 80 million tons of waste debris into the Ajkwa river system every year, according to Sampat at Earthworks. Another American company, Newmont, owns the Batu Hijau mine, also in Indonesia. This operation dumps its waste into the ocean near the island of Sumbawa.

While the EPA struggles to remediate and restore almost countless mine sites in the United States, and while activists work to stem the tide of demand on the gold industry, efforts are underway to develop more open pit mines. Among the most controversial is the Pebble Mine, proposed for Alaska's Bristol Bay region. The project, critics say, could destroy or seriously damage unspoiled wilderness, wildlife habitat, indigenous cultures and the region's sockeye salmon fishery. Of the Pebble Mine, Septoff at Earthworks said, "There could not be a clearer example of a short-term profit gained at a long-term loss."

The road ahead for the Pebble Mine's proponents will not likely be a smooth one. A major investor in the project backed out late last year, and the jewelry industry—which uses about half of all gold mined each year —has expressed opposition to the project. Several days ago, Tiffany & Co.'s chairman and CEO Michael Kowalski told JCK Magazine that developing the Pebble Mine site will almost certainly do more damage than it's worth to the environment, the region's salmon-based economy and the face of the gold

industry itself. "The possibility of this ending in disaster is so high, it's hard to see how any mining company could go forward," Kowalski told JCK.

The EPA released a report in January in which the agency said development of the mine would carry many risks of damage to the ecology and culture of the region. There is an activist slogan that says, "The more you know, the less gold glows."

But ethical, responsibly mined gold may actually be possible. It has been estimated that about 165,000 metric tons of gold have been mined in all of human history. Most of this gold is still in circulation—and a growing number of jewelers are making use of this material. Brilliant Earth, Leber Jeweler and Toby Pomeroy are three companies that have abandoned new gold and opted,instead, to only deal in recycled and second-hand material, thereby cutting mining out of the equation.

Beth Gerstein, co-founder of Brilliant Earth, based in San Francisco, says there have long been "inconsistencies" between the traditional perceived value of gold as a romantic symbol and the realities of extracting raw gold from the Earth.

"Jewelry is a symbol of commitment and values and we want this to be true inside and out," Gerstein said.

Gerstein, along with her business partner, launched Brilliant Earth in 2005, and she says demand for recycled gold has grown since the beginning.

"Consumers want to know that the product they're buying hasn't had a negative impact on the world," Gerstein said. The gesture of recycled precious metals seems a virtuous one, and public interest in supporting the effort seems to reflect goodwill. But Webster, at the American Museum of Natural History, says that recycling gold has so far done little to offset the destruction of mining.

"Unfortunately, the demand for gold, annually, far exceeds the amount recycled," he wrote. He even feels that applying any symbolic or superficial value to gold, whether recycled or fresh from an open pit mine, is ultimately only furthering the problems linked to much of the mining industry: "To me, it is interesting that because the majority of gold that is mined and extracted from ores is directed to the jewelry industry (an enterprise that societies might be able to survive with less of), we could run societies on Earth with much less gold mining." - End.

Alastair Bland -- Alastair Bland is a journalist based in San Francisco who writes about the environment, agriculture, science and food.

Gold Mining and the Environment

Dirty gold mining has ravaged landscapes, contaminated water supplies, and contributed to the destruction of vital ecosystems. Cyanide, mercury, and other toxic substances are regularly released into the environment due to dirty gold mining.

(1) Toxic Waste

Modern industrial gold mining destroys landscapes and creates huge amounts of toxic waste. Due to the use of dirty practices such as open pit mining and cyanide heap leaching, mining companies generate about 20 tons of toxic waste for every 0.333-ounce gold ring. The waste, usually a gray liquid sludge, is laden with deadly cyanide and toxic heavy metals.

Many gold mines dump their toxic waste directly into natural water bodies. The Lihir gold mine in Papua New Guinea dumps over 5 million tons of toxic waste into the Pacific Ocean each year, destroying corals and other ocean life. Companies mining for gold and other metals in total dump at least 180 million tons of toxic waste into rivers, lakes, and oceans each year—more than 1.5 times the waste that U.S. cities send to landfills on a yearly basis.

To limit the environmental damage, mines often construct dams and place the toxic waste inside. But these dams do not necessarily prevent contamination of the surrounding environment. Toxic waste can easily seep into soil and groundwater, or be released in catastrophic spills. At the world's estimated 3,500 dams built to hold mine waste, one or two major spills occur every year.

Toxic waste spills have had devastating consequences in Romania, China, Ghana, Russia, Peru, South Africa, and other countries. In 2014, a dam collapsed at the Mount Polley gold and copper mine in British Columbia, sending about 25 million cubic meters of cyanide-laden waste into nearby rivers and lakes—enough to fill about 9,800 Olympic-sized swimming pools. The spill poisoned water supplies, killed fish, and harmed local tourism.

Further Reading Smithsonian.com: The Environmental Disaster That Is the Gold Industry
New York Times Beyond Gold's Glitter: Torn Lands and Pointed Questions
BBC One year on: Romania's cyanide spill

(2) Acid Mine Drainage

Dirty gold mining often leads to a persistent problem known as acid mine drainage. The problem results when underground rock disturbed by mining is newly exposed to air and water. Iron sulfides (often called "fool's gold") in the rock can react with oxygen to form sulfuric acid. Acidic water draining from mine sites can be 20 to 300 times more concentrated than acid rain, and it is toxic to living organisms. The dangers increase when this acidic water runs over rocks and strips out other embedded heavy metals. Rivers and streams can become contaminated with metals such as cadmium, arsenic, lead, and iron. Cadmium has been linked to liver disease, while arsenic can cause skin cancer and tumors. Lead poisoning can cause learning disabilities and impaired development in children. Iron is less dangerous, although it gives rivers and streams a slimy orange coating and the smell of rotten eggs.

Once acid mine drainage starts, it is difficult to stop. Acidic waters flowing from abandoned mines can raise acidity levels and destroy aquatic life for generations. Roman mining sites in England are still causing acid mine drainage more than 2000 years later.

Further Reading New York Times As Gold Mine Prepares to Close, Montana Argues Over a Hole in the Ground

(3) **Mercury Pollution**

The use of mercury in gold mining is causing a global health and environmental crisis. Mercury, a liquid metal, is used in artisanal and small-scale gold mining to extract gold from rock and sediment. Unfortunately, mercury is a toxic substance that wreaks havoc on miners' health, not to mention the health of the planet. For every gram of gold produced, artisanal gold miners release about two grams of mercury into the environment. Together, the world's 10 to 15 million artisanal gold miners release about 1000 tons of mercury into the environment each year, or 35 percent of man-made mercury pollution. Artisanal gold mining is actually among the leading causes of global mercury pollution, ahead of coal-fired power plants.

When mercury enters the atmosphere or reaches rivers, lakes, and oceans, it can travel across great distances. About 70 percent of the mercury deposited in the United States is from international sources. Still more mercury reaches the United States through imported fish. Once it reaches a resting place, mercury is not easily removed. Sediments on the floor of San Francisco Bay remain contaminated with mercury left by the California gold rush of the 19th century.

Mercury is extremely harmful to human health. The amount of vapor released by mining activities has been proven to damage the kidneys, liver, brain, heart, lungs, colon, and immune system. Chronic exposure to mercury may result in fatigue, weight loss, tremors, and shifts in behavior. In children and developing fetuses, mercury can impair neurological development.

Further Reading Reuters Mercury Poisoning, the Dark Side of Colombia's Gold Boom
Associated Press Mercury in gold mining poses toxic threat

(4) Destroying the Amazon

A gold mining boom is accelerating the destruction of the Amazon rainforest, a biologically diverse ecosystem that acts as a check on global warming. Artisanal, or small-scale, gold miners are tearing down the forest to access the rich gold deposits beneath. One study found that deforestation rates in the Madre de Dios region of the Peruvian Amazon have increased six-fold due to gold mining.

Gold mining is also responsible for releasing large amounts of mercury into the Amazon's air and water. The mercury is poisoning plants, animals, fish, and people. In one city in the Peruvian Amazon, unsafe mercury levels were recorded in 80 percent of local residents. The gold mining boom does not bode well for the Amazon or the people, both locally and globally, who depend on it.

Further Reading Discovery News As Gold Prices Go Up, Forests Are Coming Down
Mining.com Mercury pollution linked to illegal gold mining in Peru reaches lethal levels

ARTICLE SOURCE: https://www.brilliantearth.com/gold-mining-environment/#:~:text=Cyanide%2C%20mercury%2C%20and%20other%20toxic,due%20to%20dirty%20gold%20mining.

Heavy Metal Pollution from Gold Mines:

Environmental Effects

1. Introduction; Increased urbanization and industrialization have led to large amounts of toxic contaminants being released into the environment worldwide. Some of these contaminants occur naturally, but anthropogenic sources, especially mining activities, have contributed significantly to their increase. Although mining provides enormous social and economic benefits to nations, the long-term adverse effects on the environment and public health cannot be overlooked [1].

Mining, mineral processing and metallurgical extraction are the three principal activities of gold mining industries which produce wastes. Mineral processing also known as beneficiation aims to physically separate and concentrate the ore mineral(s) using physical, chemical and sometimes **microbiological techniques.** Metallurgical extraction breaks the crystallographic bonds in the ore mineral in order to recover the desired element or compound [2]. Large quantities of waste are produced during this activity, particularly in gold mines which release over 99% of extracted ore as waste to the environment [3].

The use of bacteria in gold extraction, **known as biomining,** has received considerable attention due to the potential roles played by these bacteria in the recovery of gold from gold-bearing ores. Acidophilic, chemolithotrophic iron and sulphur oxidizing bacteria such as *Acidithiobacillus (At.) ferroxidans*, *At. thioxidans*, *Leptospirillum (L.) ferriphilum* and *L. ferroxidans*, *Sulfobacillus acidophilus Sulfolobus metallicus* have been identified and utilized in gold extraction. These bacteria help in solubilizing the sulphide matrix of the gold deposits thereby making the gold more reachable to leaching by the chemical lixiviants [4,5,6]. Biomining is known to be more environmentally friendly than many physicochemical extraction processes. In addition, the wastes generated using bacteria are less biologically reactive compared to those obtained using the physicochemical methods [5].

Tailings are the major wastes produced from gold extraction and they contain high amounts of heavy metals (HM). These metals leach out in an uncontrolled manner into surrounding environments on exposure to water or through dispersal by wind. The presence of elevated concentrations of HM in the environment is a serious health issue worldwide due to their non-degradative nature which makes them persistent and thereby exert long-term effects on the ecosystem [7]. Heavy metals affect the natural population of bacteria in the soils. This leads to loss of bacterial species responsible for nutrient cycling with a consequent negative effect on ecosystem functioning [8]. To survive in metal polluted sites, some bacteria have devised various ways to withstand the potentially deleterious conditions. They are known to develop and adopt diverse detoxifying mechanisms such as biotransformation, bioaccumulation and biosorption which can be utilized in either ex-situ or in-situ bioremediation of HM polluted sites [9]. This review focuses on environmental impacts of increasing heavy metal pollution caused by gold mining activities on human health and the environment and how bacteria interact with these metals. ... (For more detail... https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129257/)

"During the U.S. gold rush, hydraulic mining operations in California completely denuded forested landscapes, altered the course of rivers, increased sedimentation that clogged river beds and lakes and released enormous amounts of mercury onto the landscape. California wildcat miners used an estimated 10 million pounds."

MY VISITS WITH SAM MacGREGOR, SHEET METAL FABRICATOR OFF LOMA RICA ROAD. He is a third generation miner in specifically the Nevada County mining industry.
12/15?//21 AND BEYOND
REGARDING TOXIC MINERALS/CHEMICALS IN LOCAL GOLD MINING HISTORY, REGIONAL MINING HISTORY, AND HIS FAMILIES ROLE IN IT, AND MYRIAD OTHER SUBJECTS.

[SAM MacGREGOR, sheet metal friend on Loma Rica, who gave me the 1928 map, in 2021-22, "Asbestos is in ~~ALL that material " referring to the vandalized containers of core samples photographed in January on the mine~~ property. Pat] --- I hung-out with him about 20 times for an hour or more. He is a third generation local, and mining enthusiast. He is a WEALTH OF INFORMATION! (Take that recommendation from me, a 45 years CA historian and author!). I did not record all our chats and visits before he closed hi metal-shop and moved. But he is pleasant, and DEEPLY knowledgeable about all things regional GOLD! He is a walking encyclopedia! -- Pat

I stumbled across him, looking for some sheet metal work. He had gold quartz on his counter, which lead us to many hours of conversation over several weeks. He gave me this map to go and copy, on the day I met him. I made copies for myself and him, and delivered his original back to him an hour later. Then, I started studying and colorizing my own copy. MANY afternoons, I stopped by his shop and we talked for half-an-hour to three hours. Then, he told me he was closing the sheet-metal shop, selling -off everything and moving. I have picked his brain every since. Nice person, amazing brain, he has taken "20 geologists at a time throughout the county and showed them what I know!." He is, in my historical-service opinion, and AMAZING MAN AND HAS A FORMIDABLE MEMORY AND INTELLECT!!! Patio (2/26/22)

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(WE SPOKE UNRECORDED AND NOT-NOTED IN MY FILES, TWENTY TIMES AT LEAST, FOR uncountable HOURS BEFORE FEB 24. I just didn't keep notes. But, he is a wealth of three-generations of localized gold mining history, who has "Over the years, taken 20 geologists on trips through the mines and mining regions in Nevada County." (Patio)

Feb 24, 2022 After reviewing and commenting on my list of mining hazards, he exclaimed, "All these are pretty safe in tiny quantities. But , after digging, blasting, grinding, and moving it to the stamp mills or leach ponds, or ~~even underground processing, ALL of the inert and concealed elements and compounds come out as separated dust~~ and 'grounds' and get hydrated and are therefore no longer inert, especially after they are removed from the mine to the open surface, where water, air, treatment ponds, and such, release their collective toxic materials into the air and water out on the surface, and will travel all the drainage routes, as well as the local wind, to the very end where they concentrate as the end-water evaporates. So, when they say it's all 'safe', that is only as long as they remain in the solid rock. The mining in the tunnels and sending the ore to the surface for processing, is where the big problems start. " "Miners and workers have to handle, breath, and process it with a lot of abatement processes, wearing suits,

and monitoring levels around the mine areas. It's NOT like a hundred years ago. Miners are near and IN these things and they absorb amounts of it by working near it. There is a difference between the standard healthy-levels of some elements we all have in our bodies like zinc, magnesium..." (!), and those that can adversely affetc the human body and human health, basically, overdoses or unhealthy amounts." (1) In acceptable levels, oxygen, carbon, hydrogen, nitrogen, calcium, phosphorus are the most abundant elements found in the human body, followed by potassium, sulfur, sodium, chlorine and magnesium.

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1) MINING ACCIDENTS & RISKS, TRADITIONALLY AFFECTING GOLD MINE WORKERS:

Cave-ins, rock-slides
Ceiling collapses
Chemical fires
Chemical-fume exposure
Clostraphobia and/or confined spaces
Consuming and proximity to untreated water, dangerous chemicle concentrations, mercuric concentrates...
Dewatering failures - deep ruptures of dewatering systems (*see flooded gold mines)
Dismemberment of various forms (caught in machinery)
Drowning - Accidental contact with unrestrained flooding; inability to swim, loss of consciouness
Dust and particulate exposure, constant dust-particle inhailation (even despite best efforts to abate it.)
Ear-injuries (hearing problems and tinnitus) from unregulated or monitored OSHA restrictions...
Earthquakes and associated mine failures (see unsafe mining problems underground)
Electrocution and/or Electrical malfunctions, Electric vehicles in tunnels (personal injuries)
Entrapment (of many different kinds)
Equipment malfunctions, failures and user-mistakes
Exploding vessels, pipes, hoses, hydraulics under pressure
Explosives and Breaking agents - misfired, mistimed, faulty detonation, uncontrolled
Eye injuries, Optical issues
Fall of roof, ceiling, sliding rock or material, face, rib, side or highwall
Falling from ladders and moving equipment
Falling, rolling, or sliding rock or material of any kind
Fault-fractures
Failures of underground restraint systems and miner-protection systems
Fatigue [40.22 percent, #4 adverse condition]
Flooded gold mines*: De-watering former gold mines is arduous, expensive, problematic and endless
Gas and toxic Fume Fires:
Hearing loss, noise indueed loss of hearing. [62 perecnt , #5 adverse condition]
Hand tool failures and misuses
High-Temperatures [42.11 percent, #3 adverse condition]
Hoisting
Hypoxemia is a below-normal level of oxygen in your blood, specifically in the arteries.
Ignition of explosives, gas or duct
Insomnia, difficult sleeping and disrupted dreaming-cycles
Inundation - Unforseen blockages of escape routes
Lack of clean air at depth (especially below sea level) Nevada county is at
Lack of efficient sunlight and/or lighting, DIM LIGHTING [45.86 percent, #2 adverse condition]
Lack of effective before-hand safety training
Material handling
Mining gasses - unexpected intrusions...
Moisture, constant envorinmental [62.percent, #1 adverse condition]
Mold and Mildew from constantly wet environments underground, continual, daily dewatering for decades
Motorized vehicle accidents (in-mine or above ground)
Panic attacks
Powered haulage and Non-powered haulage
Rapid decent and ascent into and out of the mines (ear-drum barotrauma)
Seizures, fainting, passing-out, lloss of consciousness
Skin and body wounds; Stepping or kneeling on objects
Slipping
Smoke-inhaillation, toxic fumes inhaillation
Tinnitus [31.58 percent, #6 adverse condition]
Tunnel fires, wood fires
Unforeseen mining disasters not on this list!

2) MINING MALADIES, ILLNESS AND DEATH: (Long-term illness from extended exposures)

Adverse reactions to medications
Alcoholism and Tobacco consumption and other exacerbated health problems
Arrhythmia
Asthma
Audio impairments
Bacterial , viral and fungal diseases
Blood-pressure issues, heart conditions
Cave Gas: Gas poisoning from a variety of mining gases in varying concentrations
Chemical poisoning
Chills, hypothermia, high temperature, hypothermia
Cholera,
Chronic bronchitis
Communicable diseases
Cyanide poisoning
Deafness from blasting and loud equipment
Decreased life-expectancy
Delirium, fainting, loss of consciousness
Diminished immunal capacity
Diphtheria
Dysentery
Drug use by miners (creates risks for mine-owners)
INSECTS, CRITTERS: fleas, mice, spiders, bats, termites
Emphesema
ESRD - End-Stage renal disease
Ethnic Tensions
Gastrointestinal illnesses
Headaches
Immune system degradation and disease
Increases in various forms of cancer
Kidney diseases of various kinds, including cancer
Lack of ventilation in the mine shafts and tunnels
Liver Diseases
Lost, broken, crushed, infected and severed limbs
Lung cancer
Mercury, lead, cyanide, or arsenic poisoning
Mine-gas
Non-Hodgkin's lymphoma
Pleural diseases: (https://www.uofmhealth.org/conditions-treatments/pulmonary/pleural-diseases)
Pneumonia
Pneumoconiosis
Pre-leukemia
Pulmonary Tuburculosis (PTB)
Racial / Personal tensions
Silicosis: Silicosis, an incurable lung disease that can lead to disability and death
Sleeplessness
Stress-related illnesses
Toxics and hazardous materials exposure(s)
Thirst- lack of access to safe drinking water
Trachea, bronchial, lung and pulmonary conditions (colds, fever...)
Tuberculosis
Typhoid fever
Vertigo
Visual impairments

3) STOP-WORK ISSUES
Archaelogical discoveries
Earthquakes, earthen collapses and catastrophic cave-ins
Explosives discharges/accidents
Labor Strikes
Mass water intrusion, flooding, Inundation events
Sudden forced evacuation
Power failures
Sabotage of facilities on mine property
Major mine equipment failures
Unforeseen environmental accidents above and below ground

FOOTNOTES:
https://journals.lww.com/md-journal/fulltext/2020/02280/physical_symptoms_and_mental_health_status_in_deep.42.aspx

Biometric hazards within the context of deep level mining: https://www.saimm.co.za/Journal/v105n06p387.pdf

AND/OR,

What are causes worthy of the mine to close?

1) In a perfect world, mines would only close **when their mineral resources are exhausted**. In coal mines for example, the coal seam between the sandstone, shale or conglomerate sedimentary layers would have been completely extracted. Similarly, in hard rock mines, the valuable metals would be completely recovered.

2) An earthquake strong enough to shake the mine significantly for the tunnels and shafts to collapse, such as reducing all the empty spaces in the mine to fall in upon themselkves, and most likely creating massive sink-holes in the surfaces above.

3) For mines deep below the oceanic surface, sea-water intrusion could be catastrophic. For example, a mine that is 2,500 feet above sea-level, proposes to drill to 5,000 feet or more. That is half a mile below sea level. Should the weight of sea water against a fault, deliver significant-enough pressure to collaps it-s way into the main shaft, it would fill in all empty spaces below sea level. Serious intrusion of large water sources ic clearly not desireable.

SEE: The Office of Surface Mining Reclamation and Enforcement (OSMRE), for example, is a bureau within the United States Department of the Interior created to address coal mine remediation.
https://www.thermofisher.com/blog/mining/mining-and-the-environment-what-happens-when-a-mine-closes/

Mining Feature: Inundations Can Put Miners at Risk by Blocking Escape Routes

Keywords: Evacuation Inundations Multiple seam mining National Institute for Occupational Safety and Health Rescue
Saturday, June 30, 2012

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Inundation, or water suddenly entering a mine, is not that uncommon. In fact, there are four ways excessive water can enter a mine and cause problems:

- Flash floods (as in the case of Monday's incident) where heavy rainfall or swollen creeks and rivers dump large amounts of water into a mine entrance. This rapid inflow of water can trap miners by blocking escape routes. Water settles into the low areas of a mine tunnel or drift.
- Mining into an adjacent, abandoned mine that is flooded is another way to cause an inundation. Safety experts say this is an infrequent, but a very preventable type of inundation. Older mines may be poorly mapped meaning the boundaries are not accurately known. Mining next to one of these sites can be dangerous if the new mine workings break into an older mine that is flooded. This can be avoided by drilling ahead with a small probe that could expose a possible flooded drift in an adjacent mine, so as to avoid exposing the flooded area to the newly mined area.
- Another way a mine can incur inundation is when coal slurry, or left over mining waste, is not properly contained in an impoundment (a banked in area that holds the mineral/water mixture left over from mining). If this impoundment fails, slurry can also enter and quickly flood a mine.
- Mines can also become inundated by mining under an aquifer, such as a lake, when the ground above the mine is damaged by the mining activity.

Typically, water rapidly enters a mine in one of these four scenarios, cutting off escape routes for miners. Coal mines are particularly vulnerable to inundation due to their relatively flat orientation. As water enters, it flows to the lowest point, blocking the escape route. Mine engineers are constantly reminded of the need to provide multiple, independent escape routes for miners to prevent them from being trapped in cases such as this. (End)

RELATED RESOURCES:
1) pubs.usgs.gov (November 2005)

2) "Heavy Metal Pollution from Gold Mines: Environmental Effects and Bacterial Strategies for Resistance" **(https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129257/)**

3) You may also google " Index of minerals and elements dangerous to human health"

4) Minerals: Their functions and sources: https://www.uofmhealth.org/health-library/ta3912

5) https://www.cdc.gov/niosh/index.htm/ , (and, this other index of related gold mining health issues:) https://search.cdc.gov/search/index.html?query=gold%20mining&siteLimit=NIOSH&dpage=1

6) EARTHWORKS: The Pervasive Problems of Gold mining

A RANDOM QUESTION I POSTED ON MINEWATCH 2/25/22
STRIP-SEARCH THE MINE WORKERS

I saw one of the "investor brochures" today, for the planned mine. An interesting detail... the "planned change-room/office facility." In most large mining operations, at the end of their shift, workers are extracted from the mine and guided to a shower-room where they disrobe and leave all their clothes to be inspected in one room, then shower in another room, and then are (ostensibly) "inspected" for loose (swallowed, inserted...) gold. First, you walk naked through a "gold-detector, to see if any bells, lights, whistles go off. I am told, (by a lifelong miner), that IF the bell rings, there is on-site a "cavity inspector" whose job it is to assure no miners are 'carrying' contraband gold out of the mine. Seems crazy, BUT, at $1,900.00 per ounce (market price varies) the risks to the mine and miner are potentially severe..., and, in this example, half an ounce is $950., a quarter ounce is $475., an 1/8th of an ounce is about $240.00, which weighs 2.50 grams, or, the weight of an American DIME, but far smaller.

So, I then wondered, "how much gold would you have to steal to be charged with Grand Theft, lose your job, and potentially go to jail?" Google informed me: "Penal Code 487 PC defines grand theft as **unlawfully taking someone else's money, labor or property with a value of $950.00 or greater**. The offense is a "wobbler," *meaning it can be charged as either a misdemeanor or a felony.*" So, beyond using a metal-detector sensitive enough to register gold, (including your tooth-caps, earring, piercings and wedding ring, earrings, etcetera) then, I suppose they need an x-ray machine or fluoroscope machine to inspect the innards of their workers..., perhaps daily!!! Seems logical to me that, working in a mine and swallowing some gold in today's world, could get you a felony arrest and jail-time.

Now, was this true in the distant mining past, no, why, no x-ray machines were on-site, gold was worth $20-45. an OUNCE, and greed-driven thievery, was neither a critical (nor, necessarily enforceable) issue. So, any greedy job-seekers or employees at the mine, can/may possibly..., look forward to full body inspections upon leaving work. Similar to prison inmates who are screened for a knife ("shiv" (a knife or razor used as a weapon)), they want to take back to their cell. These inspections may be random, like drug testing, they may be based upon your job and actual access to the ore... Or, possibly, everyone in any contact with freshly mined gold will be daily-scanned. Historically, these folks were known as "highgraders."

Correct me if I am wrong, I often am! All insights on this are welcome! Thanks! Pat
(P.S., I wrote a book about sushi and Japanese cuisine and history a few years ago. In a fine Sushi restaurant, a chef-friend, gave me sushi with gold leaf on it. I ate it. No problem. It was microns thin. But, in Japan The Emperor ate it, because he could.)

DEFINITIONS of COMMON GOLD-MINING MINERALS, ELEMENTS, AND THEIR DANGERS TO HUMAN HEALTH

(Research compiled by T.P. Jacobsen 2/20/22 onward. UPDATE: 4/4/22 2:46:57 PM)

***PREAMBLE:** The purpose of this list/effort, is to research and confirm, to the best of my ability, the ACTUAL historical materials to be found in the largest mines of their kind, known to have operated in the past 175 years in the Nevada County, CA, Grass Valley mining region. The major mines which this research is reflecting are the: Empire Mine, The North Star Mine, The Idaho-Maryland Mine and the Pennsylvania Mine. Many other far smaller mines skirted nearby these leaders, and only the Central Consolidated and the Empress Mine approached the other leaders in size and output. Today, in 2022, with gold worth $2,000 USD per ounce, the highest value inrecorded history, the ATTEMPTED "re-opening" the Idaho-Maryland mine seems a folly, since these major regional mines which have been closed for over 70 years. Public sentiment is BY FAR, against it! (March 2022).*

Therefore, I have created this document, and an entire binder of hundreds of research pages around this idea, to illuminate "fence-sitters," as well as all concerned land-owning citizens, as to the nature of both sides of the proposition. Most, but (perhaps) not all elemental constituants herein, are in each and every mine, or neighborhood. Neither, may they be in detremental-quantities, that might harm the public, nor, mine workers.

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***PERSONAL EDITORIAl:** I simply feel that..., I am compeled to pursue this because..., my/our home is within 1/2 mile of the center of the "NEW," potential (albeit improbable) rebuilding of the I-M Mine, as they plan to get "ALL they can," from whatever reaches the may explore, that our neighborhoods, underground water sources, etc, and quality of life shall be irrevocably destroyed by an "out of country' mining company, who smells profits, then moves on. I simply cannot stand by and allow this, without at least an intellectual fight. But, logic does not always prevail, nor, do facts! As a lifetime California and West Coast historian, author, publishor and researcher, who now lives in this region since 1994, I shall offer to do my best to defeat their folly and technologically-unproven attempt, to empty the wealth of our lands (no matter their promises...), in the name of profit-companies from other lands (British Columbia), at the wreck-and-ruin of short-sighted-foreign militantly-minded, and clearly in their tactics, greedy for what is not theirs, by simply buying into a legacy without care nor consideration for the "natives' and modern society, who live here. Not all battles are fought with weapons. This invasion, shall be fought with all the best we as a regional society can bring, to protect our ways of life... Nearly 80 years after all the "Big Mines" closed and fell into history! -- Thomas P. Jacobsen, California Historian, Nevada City resident.*

***CAVEAT:** I cannot prove nor disprove what I have mentioned here. I am not a scientist of mining history, nor regional geophysical phenomenon. But, I AM a serious researcher and historian and author (40+ years), so, there is a deep, good-faith application of well-researched and quantifiable information here, which can be trusted. I draw upon only the most verifiable sources (often footnoted!), and I stand behind myt assertions and 48 years of work! - Patio*

DEFINITIONS:

What is the scientific definition of a mineral?
A mineral is a naturally occurring inorganic solid, with a definite chemical composition, and an ordered atomic arrangement. This may seem a bit of a mouthful, but if you break it down it becomes simpler. Minerals are naturally occurring. They are not made by humans. Minerals are inorganic.

What is the scientific definition of an element?
A substance that cannot be broken down into simpler substances by chemical means. An element is composed of atoms that have the same atomic number, that is, each atom has the same number of protons in its nucleus as all other atoms of that element. A chemical element, also called element, any substance that cannot be decomposed into simpler substances by ordinary chemical processes. Elements are the fundamental materials of which all matter is composed.

* FOLLOWED BY A 21 PAGE LIST OF OVER 110 DIFFERENT ELEMENTS, MINERALS AND TOXICS IN LOCAL MINES (I'll PRINT ONE AT YOUR REQUEST)

Arsenic hazards to humans, plants, and animals from gold mining

Ronald Eisler[1]

Abstract: Arsenic dangers to humans and animals

Arsenic sources to the biosphere associated with gold mining include waste soil and rocks, residual water from ore concentrations, roasting of some types of gold-containing ores to remove sulfur and sulfur oxides, and bacterially enhanced leaching. Arsenic concentrations near gold mining operations are elevated in abiotic materials and biota: maximum total arsenic concentrations measured were 560 microg/L in surface waters, 5.16 mg/L in sediment pore waters, 5.6 mg/kg DW in bird liver, 27 mg/kg DW in terrestrial grasses, 50 mg/kg DW in soils, 79 mg/kg DW in aquatic plants, 103 mg/kg DW in bird diets, 225 mg/kg DW in soft parts of bivalve mollusks, 324 mg/L in mine drainage waters, 625 mg/kg DW in aquatic insects, 7,700 mg/kg DW in sediments, and 21,000 mg/ kg DW in tailings. Single oral doses of arsenicals that were fatal to 50% of tested species ranged from 17 to 48 mg/kg BW in birds and from 2.5 to 33 mg/kg BW in mammals. Susceptible species of mammals were adversely affected at chronic doses of 1-10 mg As/kg BW or 50 mg As/kg diet. Sensitive aquatic species were damaged at water concentrations of 19-48 microg As/L, 120 mg As/kg diet, or tissue residues (in the case of freshwater fish) > 1.3 mg/kg fresh weight. Adverse effects to crops and vegetation were recorded at 3-28 mg of water-soluble As/L (equivalent to about 25-85 mg total As/kg soil) and at atmospheric concentrations > 3.9 microg As/m3. Gold miners had a number of arsenic-associated health problems, including excess mortality from cancer of the lung, stomach, and respiratory tract. Miners and schoolchildren in the vicinity of gold mining activities had elevated urine arsenic of 25.7 microg/L (range, 2.2-106.0 microg/L). Of the total population at this location, 20% showed elevated urine arsenic concentrations associated with future adverse health effects; arsenic-contaminated drinking water is the probable causative factor of elevated arsenic in their urine. Proposed arsenic criteria to protect human health and natural resources are listed and discussed. Many of these proposed criteria do not adequately protect sensitive species. (https://pubmed.ncbi.nlm.nih.gov/14561078/)

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LEGAL OVERSIGHT OF THE U.S. MINING INDUSTRIES

California Department of Conservation Mine Reclamation
STATUTES & REGULATIONS JANUARY 2020 - Gavin Newsom, Governor
https://www.conservation.ca.gov/index/Documents/DMR-SR-1%20Web%20Copy.pdf

WHO REGULATES MINING IN CALIFORNIA?
State Mining and Geology Board. "SMARA" also encourages the production, conservation, and protection of the state's mineral resources. Public Resources Code Section 2207 provides annual reporting requirements for all mines in the state, under which the State Mining and Geology Board is also granted authority and obligations.

WHO REGULATES GOLD MINING IN AMERICA?
The **U.S. Department of Interior** *,Bureau of Land Management and the U.S. Department of Agriculture Forest Service Exit Exit EPA websiteregulate mining activities on federal land managed by these agencies. The U.S. Army Corps of Engineers, EPA, and state agencies also have roles in regulating the mining industry.
*https://search.usa.gov/search?query=gold+mine+regulations&op=Search&affiliate=doi.gov

WHAT ARE NEVADA GOLD MINE'S ENVIRONMENTAL POLICY COMMITMENTS?
Minimize our use of water and control our impacts on water quality. Engage with stakeholders including local communities to support sustainable management of water resources for the benefit of all local users. Use energy as efficiently as possible.

Who regulates mining companies?
Department of Environment and Natural Resources
Which Government bodies administer the mining industry? The DENR regulates and administers the mining industry. The Department of Environment and Natural Resources is the executive department of the Philippine government responsible for governing and supervising the exploration, development, utilization, and conservation of the country's natural resources. The Mining Act governs large-scale exploration, development and utilisation of mineral resources.
1.2. Sep 13, 2021

WHICH STATE HAS THE MOST GOLD?
(In Order: 1. NEVADA, 2. ALASKA, 3. COLORADO, 4. CALIFORNIA, 5. ARIZONA) ...
" 4. California - "Californian gold was first discovered along the Colorado River, in the Potholes district (present-day Imperial County) by Spanish prospectors between 1775 and 1780. In 1848, James Marshall found gold at Sutter's Mill, Coloma, which started the California Gold Rush." Exhaustion of placer deposits gave rise to hard rock mining (quartz mining) in 1849, and three years later hydraulic mining of placer gold started. California's gold production peaked in 1852, with 3.9 million troy ounces (121 tonnes) being produced that year. With rich placer deposits being discovered in the Columbia Basin in Sonora district's Jamestown in 1853, total gold production surged to 5.9 million troy ounces (183 tonnes). Despite these new methods, production began declining and by 1865 it had plunged to 867,000 troy ounces. From 1939 to 1941, there was a sudden surge as gold production went up to 1,400,000 troy ounces for each of those three years — one of the reasons being a price rise from $20.67 to $35 per ounce. World



War II and the shutting down of gold mines to free up men to fight saw production plummet and never subsequently recover to pre-conflict levels. California's gold production in 2018 was 140,000 troy ounces — all coming from the Imperial County Mesquite mine. Owned by Equinox Gold, active mining was resumed in 2007, after being inactive since 2001." (https://www.nsenergybusiness.com/news/top-five-gold-mining-states-us/)

How many abandoned mines are in California? The BLM and the California Department of Conservation's Office of Reclamation estimate there are **approximately 47,000** abandoned mines in California, two-thirds of them on Federal lands. Nov. 23, 2009

Are there any active mines in California? California's **700 active mines**, which employ about 5,300 people, produced minerals valued at $3.4 billion in 2009, down from the 2008 total of $4 billion. California's production accounted for 6.3 percent of the nation's total. About two dozen industrial minerals made up most of the total production value.

Idaho-Maryland Mine Technical Data

https://mrdata.usgs.gov/mrds/show-mrds.php?dep_id=10310630

REGIONAL GEOLOGY The Idaho-Maryland Mine is the second largest underground gold mine in the Grass Valley District. The Idaho-Maryland and the Empire-North Star Mine, located to the south, are the two largest-producing underground gold mines in California. The district is located in the northern portion of the Sierra Nevada Foothills Gold Belt. This belt averages 50 miles wide and extends for about 150 miles in a north-northwest orientation along the western slope of the Sierra Nevada range. The Foothills Gold Belt roughly coincides with the Foothills Metamorphic Belt, which can be subdivided into four major lithotectonic belts: Western Belt, Central Metamorphic Belt, Feather River Peridotite Belt, and Eastern Belt. The Grass Valley District lies within the Central Belt, where in the Grass Valley area it is marked by an 8-mile-wide north-trending assemblage of two accreted terranes that range from Late Triassic to Late Jurassic in age. The Central Belt is bounded on the east and west by regional-scale tectonic suture zones; the Wolf Creek Fault Zone on the west and the Gills Hill Fault/Melones Fault Zone on the east. The oldest rocks in the area are those of the Carboniferous-Triassic metasedimentary Calaveras Complex. Originally clastics, these rocks were converted to schistose or slaty rocks during the Late Paleozoic orogeny and locally into a contact-metamorphic biotite gneiss by intruded granodiorite during Late Mesozoic time. The slates of the Jurassic Mariposa Formation, which outcrop in a small part of the area, are relatively unaltered. Igneous rocks in the district include granodiorite, diabase, porphyrite, amphibolite schist, serpentinite, gabbro, diorite, quartz porphyry, and various dike rocks (Johnston, 1940). The veins of the Grass Valley and neighboring Nevada City districts are not connected with or continuations of the famous Mother Lode vein system to the south. The last veins of the Mother Lode end about 20 miles to the south. Also, the Grass Valley veins differ in general character from those of the Mother Lode. Generally, the Grass Valley veins are narrower and produce a higher-grade ore than those of the Mother Lode. The veins trend in two primary directions. One set trends N-S (dipping E or W), and the other trends E-W (dipping N or S). The major feature of the Grass Valley District is a body of Lower Cretaceous granodiorite and diabase five miles long from north to south and half a mile to two miles wide (probably the apex of a larger batholitic mass). It which is intruded into older sedimentary and igneous rocks, including diabase of the Mesozoic-Paleozoic Lake Combie Complex, and is itself cut by various dike rocks. Gold-quartz veins cut the granodiorite and diabase (and in some cases, serpentinite) throughout the district. Most of the veins strike generally north, parallel to the intrusive body, and display gentle dips averaging 35?. Others strike northwest, parallel to a diabase contact with the granodiorite. The veins fill minor thrust faults that occur within fracture zones of various width and degree of fracturing. The maximum measured reverse displacement is 20 feet (Johnston, 1940). In all veins, quartz is the principal vein material and occurs in four textural types: 1) Comb quartz that forms crustifications and lines vugs, 2) massive milky quartz with a granular texture that displays many sharp crystal faces and has not undergone deformation, 3) sheared quartz developed with little or no dilation of the vein fracture and commonly showing ribbon or shear-banding structures, and 4) brecciated quartz formed where vein movement dilated the interwall space (Johnston, 1940). Gold occurs in quartz and in sulfides, principally pyrite. Although specimen ore has been found, most ore from the district occurs as fine and coarse free-milling gold in ores averaging between 0.25 to 0.5 ounces per ton.

- An important structural feature in the district is a group of "crossing" vertical or steeply dipping fractures that strike northeast, about normal to the long axis of the granodiorite body. In places they are simple fractures; elsewhere they form sheeted fracture zones several feet wide. Some are tight, some are open and form watercourses, and few contain any quartz. Two main stages of primary or hypogene mineralization are recognized - 1) a hypothermal stage represented by one vein and one mineralized crossing, in which magnetite, pyrrhotite, pyrite, and specularite were deposited, and 2) a mesothermal stage, in which the gold quartz veins were formed. The mesothermal stage is further divided into two sub-stages - an older one, in which quartz is the principal gangue mineral, and a younger one, marked by the deposition of carbonates. Pyrite and arsenopyrite, deposited in the quartz stage, are the earliest sulfides of the gold-quartz veins. Sphalerite, chalcopyrite, and galena are somewhat later. No secondary or supergene minerals have been noted except limonite, calcite, and gypsum, which are being deposited in the oxidized zone. The distribution of gold in the ore shoots is extremely erratic and assays of adjacent vein samples commonly differ widely. Some ore shoots have a pitch length of several thousand feet, but most are much smaller. Adjacent to veins and crossing fractures, the wall rocks are generally highly altered. Ankerite, sericite, and pyrite have replaced the original rock-forming minerals. Lesser amounts of chlorite and epidote have been found. The wall rock has not been replaced by quartz. LOCAL GEOLOGY By far the most important vein in the Idaho-Maryland Mine was the Eureka-Idaho-Maryland vein. This vein strikes N 77? W and has an average dip of 70? SW, ranging between 50? and 80?. The hanging wall is composed of diabase and gabbro, and the footwall is serpentinite. All of the rocks are highly altered and contain abundant ankerite. Mariposite commonly occurs in the serpentinite. The famous Eureka-Idaho ore shoot had a pitch length of almost 1 mile and a breadth of 500 to 1,000 feet. The width of the shoot averaged 2.5 feet but reached 8 feet in places. The average gold content in the Eureka-Idaho shoot was 1 ounce/ton. Most of the gold was free gold, and much specimen ore came from this famous shoot. Between 1-2 percent of the ore was sulfides, pyrite being the most abundant. Lesser amounts of galena, chalcopyrite, and sphalerite are present. The sulfides yielded between 5 and 20 ounces of gold per ton.

- The Idaho-Maryland is the second largest underground gold mine in California behind the Empire Mine. The mine was located in 1865. The first period of mining extended from 1867, when the Idaho Quartz Mining Company was organized, until 1893. In 1867, a shaft was sunk to 300 feet and encountered a rich pay shoot (the eastern extension of the Eureka - Idaho Ore Shoot). The Idaho Quartz Mining Company worked this same pay shoot stoping it for a distance of 3500 feet along strike until 1893 when the eastern limit of the Idaho claims were reached. Total output up to this time was $11,638,000, with ore ranging $12.76 to $35.00/ton and averaging $20.00/ton. Most of the gold came from the Eureka-Idaho shoot, which averaged 2.5 feet wide yielded 1 ounce/ton. The Idaho Mine was developed by a shaft inclined at 70 degrees to the 1000-foot level and an inclined winze raking to the east, called the Canyon shaft, that bottomed at the 1600-foot level at a vertical depth of 2,180 feet. In 1893, in settlement of a dispute over the eastward extension of the Eureka-Idaho shoot, the Maryland Company acquired the Idaho Quartz Mining Company for $85,000. From 1893 until 1901, the Maryland Company operated the mine and produced $1,250,000 in gold. A winze was sunk from the 1,600- to the 1,900-foot level. However, in 1894, a fire destroyed the hoist and the mine was flooded and workings below the 1,600-foot level were not reclaimed. In 1901, partly because of the poor condition of the workings, the mine was closed. The mine remained idle until 1903 when it was bonded to the Idaho-Maryland Development Company, which worked it until 1914. The company succeeded only in reopening it to the 1600-foot level, and the $300,000 in gold they produced came mainly from old stopes and pillars left behind by the earlier operators. A fourth period of activity

extended from 1918 to 1925, when the mine was operated by the Metals Exploration Company. At a cost far exceeding the $500,000 in gold it produced, the main shaft was extended downward 1,000 feet to the 2,100-foot level at a vertical depth of 2,000 feet. Drifts on the 2,000- and 2,100-foot levels were driven from the main shaft, the Dorsey winze, and a new winze was sunk 850 feet below the 2,000-foot level. Failing to find a new ore shoot, the company suspended operations in 1925. Control of the property changed hands in 1926 when Errol MacBoyle and Edwin Oliver created holdings that included the Idaho-Maryland, Brunswick, and Morehouse mines. Work resumed the same year under the Idaho- Maryland Mines Company. New ore was found and the mine entered a period of prosperity. During the three years 1930, 1931, and 1933, the mine produced $1,681,887. Total production for the period 1868 - 1933 was almost $16,000,000. From 1926 to 1942, the mine produced 650,000 ounces of gold from 1.1 million tons of ore. The mines were closed in 1942 due to enactment of the Federal War Production Board's Limitation Order L-208, but were reopened again in 1945. Production was hampered by depleted operating funds, rising costs, labor shortages, and negligible exploration. All mining ceased in 1957. At the time of closure, the mine was owned by Idaho-Maryland Industries. In 1983, Emgold Mining Corp., through its subsidiary Emperor Gold (U.S.) Corp., obtained a lease and option to purchase all mineral rights formerly held by Idaho-Maryland Industries. From 1993 to 2000, Emgold spent $7,000,000 evaluating the Idaho-Maryland properties. The project was put on hold for 1.5 years while the lease and option were renegotiated. The revised Agreement includes a mining lease and option to purchase the property consisting of 2,750 acres of minerals and minerals rights and approximately 37 acres around the old New Brunswick shaft. The term of the lease is 5 years commencing on June 1, 2002. As of March, 2004, Emgold had conducted a boring and assessment program, but has not yet commenced mining operations.

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Additional information on the Idaho - Maryland Mine is contained in File No. 331-9392 (CGS Mineral Resources Files, Sacramento)

The Security Gate at the Industrial Lot for Idaho-Maryland
(March 9, 2022)

After hearing the report some months ago by the "Botanist" who certified their own Wildlife Report..., I remembered that every time I had driven into the mine property, whether to do green wast last year, talk with, and drop-off wood for the "Forewood for Seniors" program, the gate was locked but the fence was deliberately cut open, and never repaired, nor, re-tied to the main anchor-post. Today, when I drove by again (March 9, 2022), I saw the gate was still locked, but the fence had a three-foot gap where the cyclone fencing had been pulled away. The wood-chips and bark of a couople years was collected all along the bottom of the fence, except where.... I had been left open for deer, bears w/ cubs, which I documented last year when PG&E had a lease on the mine property for replacing poles and wire from the fires of 2021! I have also PERSONALLY seen bears, deer, raccoon families, foxes, coyotes and one big German Shepherd go through in the evenings. A PG&E Security Agent, who worked there throughout the lease last year (2021) said she would "happily shere her knowledge of the critters and wildlife that passes through here, including one mother bear and her three cubs."

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August 6, 2021 - From my post on the Minewatch site: "I stopped by the Brunswick site again today, the security guy sent me to the head-honcho of the long-term PG&E team and supply people , who are leasing the acreage and unloading new log phone-poles, wire, etc, to replace what has been burned in the recent fires, for infrastructural replacement. "NOTHING HERE HAS ANYTHING TO DO WITH THE MINE!" I chatted with her about the mine proposal and it's impact, and the 24/7/365, eighty year lease, etc. She just shook her head in disbelief and asked "why, now, this is a populated area now, not like it was long ago."I mentioned dewatering down Wolf Creek, and she said ..." Yesterday, some of us were right here by the gate and a BIG mama bear came running through here with THREE CUBS, heading over toward that creek, lots of berries over there. We stayed out of their way. Oh, there's wildlife here!" Patio . (She also asked that folks not come there, because you cannot trespass on the PG&E lease. I told her I would not publish her name.) But, since I now know her, I can stop in now and then with questions!"

WHAT ARE LAURA, MYSELF AND OUR LOCAL NEIGHBORS, MOST CONCERNED ABOUT

785-5 THE MINE REOPENING, AND ITS AFFECTS UPON THE WATER SOURCES RELATED TO LOCAL HOMEOWNERS WITHIN 5 MILES OF THE POTENTIAL RE-OPENING OF THE I-M MINE (2022) (FEB.28, 2022.)

1) LOSING OUR WATER SUPPLY, THUS OUR INNATE PROPERTY RIGHTAS AS HOMEOWNERS IN THE REGION.

785-6 2) THE RE-INDUSTRIALIZATION OF GRASS VALLEY LESS THAN HALF-A-MILE FROM OUR HOME ON GREENHORN ROAD, and the devaluation of our homes, properties and lifestyle.

785-7 3) TRAFFIC IMPACTS, WHEN MINE-TRUCKING CHOKES OUR LARGEST AND ONLY ARTERIES TO AND FROM DOWNTOWN GRASS VALLEYAND CEDAR RIDGE.

785-8 4) THE REMOVAL OF OUR REGIONAL GOLD RESOURCES, BY A COMPANY FROM BRITISH COLUMBIA, WHO WILL NOT SHARE IN THE FINANCIAL GAINS IN ANY RELEVANT WAY WITH LOCAL RESIDENTS.

785-9 5) THE RESUMPTION OF POURING TOXIC CHEMICLES, DIRT, AND DEBRIS INTO OUR LOCAL RIVERS, THAT HAVE TAKEN NEARLY ONE-HUNDRED YEARS TO RESTORE!

785-10 6) DEVASTATING IMPACTS TO OUR VERY WAY OF LIFE HERE AND OUR RETIREMENT QUALITY OF LIFE IN OUR HOME AND NEIGHBORHOOD!

MOSSMAN & RISE

https://iknnews.com/rise-gold-rise-v-ben-mossman-up-to-his-tricks-again/

About The Author



A resident of Peru for two decades, Mark Turner is the author of the IKN blog and The IKN Weekly, providing unique insight and truly independent analysis on the junior mining sector since 2008. He is proud to be hated by many mining sector executives and will politely decline the kind offer to appear on your webinar, TV slot or media interview.

Disclaimer

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12 / 23 / 15

News from Banks Island Gold (BOZ.v), Louis James's "biggest personal position" In three snack-sized parts.

1) Here's what Louis Lobito Little Wolf James, fake geologist and chief rock kicker at Casey Research, said about Banks Island Gold (BOZ.v) in 2014 when he pumped the merry bejeez out of it and got people in at 50c (and here's an extract line or two):

"I want to remind readers that both Doug Casey and I own shares in Banks. Personally, it remains my largest position."

"...I'm reiterating my renewed Buy recommendation. Whatever happens in the near term, these shares are a great buy, whether for a first tranche or a second. I intend to buy more myself—after giving you a chance to do so first."

2) Here's what IKN said about Banks Island Gold (BOZ.v) when your humble scribe eventually took a look at the thing (and here's an extract line):
"Seriously. I mean, seriously, how can anyone in their right mind like a company with a balance sheet like this? Let alone somebody as dangerous to other people as Lobito who recommends it to other people. Especially when those people are a bunch of naive sheeplike followers who require a little expertise in the sector, not tripledumb investment advice?"
"I knew Louis James was stupid about geology. I didn't realize how stupid he was about financials. The above is just plain embarrassing, it's amateur hour level."

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3) And here's what **BOZ.v said today:** *VANCOUVER, BRITISH COLUMBIA–(Marketwired – Dec 23, 2015) – Banks Island Gold Ltd. (TSX VENTURE:BOZ) (the "Company") announces that the Company has canceled the equity financing announced by news release on December 1, 2015. The Company did not receive sufficient interest to be able to close the $3M minimum financing required to support its operations over the coming months.*

As a result, the Company has insufficient funds to maintain operations and has received notice of claims from three significant trade creditors for payment of outstanding debt. The mining reclamation bond posted by the Company with the Ministry of Energy and Mines has been confiscated by the Ministry. The Company has provided notice of termination to all of its remaining employees effective December 31, 2015. The Board of the company is currently comprised of Ben Mossman, Jason Nickel, John Anderson and Frederick Sveinson.

The Company is consulting with its legal advisors, and will provide a further update on the Company's status in the coming weeks. How's that trade doin', Lobito?

08 / 08 / 20

How scams operate, Rise Gold (RISE.cse) edition
They are desperate to force this through after failing to pass the resolution at the July 2020 AGM, the whole plan from the beginning was to exchange your dollar bills for Benjamin Mossman's paper. Therefore, they are going to SGM next month and woe betide any of you holding the paper at that point, because they won't make a silly admin error again.

Be clear, this company is worthless because its only project isn't just unpermittable, it makes Pebble look like a walk in the park. Lawrence Lepard should be thoroughly ashamed of himself for getting mixed up with this white collar criminal Mossman.

Rise Gold Announces Special Meeting

Grass Valley, California–(Newsfile Corp. – August 7, 2020) – Rise Gold Corp. (CSE: RISE) (OTCQX: RYES) (the "**Corporation**") announces that a special meeting (the "**Meeting**") of holders of shares of common stock of the Corporation ("**Shareholders**") will be held at 10:00 a.m. PST on September 18, 2020 at the Corporation's Vancouver office.

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At the Meeting, Shareholders will be asked to pass an ordinary resolution to approve an increase of the Corporation's authorized capital, from 40,000,000 shares of common stock with a par value of US$0.001 per share to 400,000,000 shares of common stock with a par value of US$0.001 per share, the same authorized capital as existed prior to the recently conducted reverse share split. The increase in authorized capital is necessary in order for the Corporation to, among other things, continue to raise capital in order to execute its business plan and finance its activities.

Under the Nevada Revised Statutes, pursuant to which the Corporation was incorporated, the vote will require approval of "a majority of the voting power," being over 50% of the Corporation's issued and outstanding shares.

The Corporation plans to mail proxy materials to Shareholders on August 28, 2020, which will contain additional details on the Meeting, including how Shareholders can submit their vote.

About Rise Gold Corp.

Rise Gold is an exploration-stage mining company incorporated in Nevada, USA. The Corporation's principal asset is the historic past-producing Idaho-Maryland Gold Mine located in Nevada County, California, USA. The Idaho-Maryland Gold Mine produced 2,414,000 oz of gold at an average mill head grade of 17 gpt gold from 1866-1955. Historic production at the Idaho-Maryland Mine is disclosed in the Technical Report on the Idaho-Maryland Project dated June 1st, 2017 and available on www.sedar.com.

On behalf of the Board of Directors:
Benjamin Mossman
President, CEO and Director
Rise Gold Corp.

THERE IS MORE ON THIS SITE

"DERAILING THE SHINY PROMISE"

Grass Valley's 174 year old mining legacy faces deeply fractured questions!

By T.P. Jacobsen (3/19/22)

The existance of gold in California has been historically known from the time of the expedition of Sir Francis Drake, 1577-79, being particularly noticed by Hakuyt in his account of the region, 271 years before the Coloma discovery. The next occurance of gold upon the placers was noticed in a work upon "Upper California" published in Spain in 1690 by Lyola Cavello, a priest at the mission in San jose, Bay of San Francisco, 158 years before Coloma. Later still, in 1721, Captain Shelvrocke speaks favorably of the appearnce of the soil-form gold, and of the "probably richness of the country in metals." The "Historico-Geographical Dictionary" of Antonio de Alcedo, 1786-89, positively affirms the abundance of gold even in lumps of 5-8 pounds. The favorable appearance of the country for gold, and of Oregon also, was noticed by Professor J.D. Dana, and recorded in his geographical report of the country. In Hunt's "Merchants' Magazine" for 1847, is a "very decided statement by Mr. Sloat respecting the richness of the country in gold, made from his obversations there the previous two-years; and he confidently predicts that its mineral development will greatly exceed in richness and variety the most sanguine expectations." *Why is this important?* Because, even young historians like myself heard "gold was discovered in 1848," while records state it was nearly 300 years earlier!

In these years of the late 1840s, the Mormons connected with the army were known to have gathered some gold upon the banks of the streams, and the Mexicans and Indians also. Thus, a party of three Americans, two of them Mormons, were on February 9, 1848, at Sutter's mill on the American Fork of the Sacramento, near the town of Coloma in El Dorado county, engaged in repairing the race, which had been damaged by the spring freshets, when the little daughter of the overseer, named James W. Marshall, picked up in the race a lump of gold and showed it to her father as "a pretty stone." The discovery didn't immediately attract much attention; and "the Mormons particularly sought to prevent the facts from being made public." The Rev. C.S. Lyman in a letter to the "American Journal of Science," of March 1848 says: "Gold has been found recently on the Sacramento [river] near Sutter's Fort. It occures in small masses in the sands of a new mill race and is said to promise well." The news spread rapidly and caused an unparalleled tide of emigration to pour-in from Mexico, South America, the Atlantic states, and even from Europe and China. Almost immediately, gold was discovered at a nearby "*Grassy Valley*," that today is Grass Valley, Nevada County, California's most famed gold mining region.

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Subsequently, gold miners flooded the area, and mining exploded! The Empire mine opened in 1850, and the Idaho-Maryland mine opened in 1867, ostensibly becoming the two richest and most productive mines in America during their heyday. Thirty-five years later, between 1902 and 1919, the Idaho-Maryland mine became inactive, but, was revived around 1920 and some mining resumed until 1925 when exploration again ceased. The North Star mine (opened in 1851) and Empire mine were consolidated in 1929. Then, in 1956, the Empire mine's operations ceased, as did the Idaho-Maryland. At that time, gold was worth an average of

$35.20 per ounce, up only slightly from the previous century. The three largest, most successful mines in the state, suddenly closed at the same time, 1956, with no timely consideration of reopening. All were closed and sealed, mine buildings were eventually demolished and the grounds laid silent. But, 66 years later in 2022, when gold reached its highest price in history, a tiny Canadian company, decided to attempt to reopen the most famous gold mining area in America, as visions of golden millions danced in their heads. Their headlong goal to create a "second gold rush," as it has been coined, has raised fears, suspiscions and intense regional concerns. Let's see why.

In 1843, before gold was "discovered" in California, it was nationally valued at $20.67 per ounce. Eighty years later in 1922, it was still worth $20.67 per ounce. In 1934 when the Depression was deepening, gold was just rising to $34.00. President Roosevelt then devalued the dollar by increasing the price of gold to $35 per ounce. Ten years later in 1943, crawling like a hundred-year-old-snail, gold finally found it's way to $36.50, as the world fought WWII. At that moment, gold had hovered between $26.00 and $36.50 (mostly lower) for more than a century. But, eventually, after (another) 66 years, in 2009, one-ounce of pure gold, reached over $1,000. for the first time. Moreover, today, in 2022, nearly 77 years after WWII, gold has suddenly reached more than $2,000. per ounce, or, one-hundred times what it was in 1922, 100 years ago. [(1)(2)]

That's why today we all must adjust to wisely navigating a careful and systematic plan for gold mining's possible future. The historical timelines are recorded and etched, the deeds are done, the history of Northern California's gold rush is today detailed in countless and and endless forms. An industry frought with massive populations shifts, industrial upheaval, ecological destruction on an unfathomable scale, 150 years of unknown dangers and misunderstood toxic legacies still lurk, waiting silently for the next unwary populous to re-open Pandora's 'golden' Box. There really is no way of sugar-coating the historically proven facts. No way either, to hide the irrefutable truths of gold mining's industrial and human histories, uneducated mistakes, myriad tragedies, and then later decades of near record dormancy. Each answer that is found, opens countless more questions. It begs the question, "If the past 174 years are over, and barely the bones remain, WHY would anyone start it all over again?" The answer seems simple, greed.

***"Modern industrial gold mining destroys landscapes** and creates huge amounts of toxic waste. Due to the use of dirty practices such as open-pit mining and cyanide heap leaching, mining companies generate about 20 tons of toxic waste for every 0.333-ounce gold ring." -- https://www.brilliantearth.com/gold-mining-environment/*

(3) *What else sells for that price PER OUNCE today in March 19, 2022? Prices vary in rare- metal markets, so these are the posted prices for today on the Internet. Rhodium $18,317.00, Iridium $4,900.00, Palladium is $2,555.00, Gold is $2,000.00, Platinum is $1,087.00, Ruthenium $620.00, Osmium $400.00, Silver, $25.00 and Copper is $.30 cents!*

THE HISTORY OF THE IDAHO MARYLAND AND ASSOCIATED MINES

By PAT JACOBSEN, California Historian & Author

(Update: 4/4/22 12:30:34 PM)

4/4/22 @ 12:07PM actual time I saved the final draft.

Premise: As the following report will show, mines have a life span that determines their place in history. Few become 'legendary,' few create remarkable wealth, and, as the treasuers therein diminish over time, they are not replaced. Left uncared-for, the go back to the environment from which they came. The Idaho-Maryland originally opened in several smaller forms, and evolved over time. Portions of the eventual mine included several other ventures that opened and closed, changed and failed, and were intensly mined of their precious holdings. The story is not difficult to unravel and explain, and each has it's own lifespan and soliloquy. In the end, the constituant mines of long regional past, had myriad problems, disasters, mergers, tunnel collapses, deadly underground problems, fires, labor strikes, governmental intrusions, the whole gambit. We must remember that resources are and access to them, especially gold, come with great costs and attendant dangers. This timeline details in brief, the tribulations of the respective mines who, over time, made-up the Idaho-Maryland endeavour. Like an old horse, put out to pasture, the mine has outlived its safety, viability and the presently-suggested plans, will never pass muster with Official State and other governmental agencies, safety inspectors and the public at large. The misguided and current proposal (and many former ones,) to reopen the I-M Mine, are riddled with false-hopes, dubious "facts," unrealistic goals and intentions, and an unprovable narrative by it's proponants, that a new life could be raised from the grave, like some magical Phoenix. Comprehensive research and historical research, "data-mining," clearly show the folly (and possible/probable hoax...) the current wannabe-millionaire "mine owners" are proposing, especially in the windstorm of current regional disapproval. Perhaps the lesson here, is to let the sleeping dog lay. -- Pat Jacobsen

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Bibliography: This entire document is based upon the edited version of the book here mentioned, for the edification of the history of the mine to those on the NC Board of Supervisors, who might find it useful, while making their determinations about the possible reopening of the Idaho Maryland mine in the future.

Let us work to agree that the future shall NOT repeat itself. - Pat Jacobsen (4.4.22)

"Gold in Quartz, The Legandary Idaho-Maryland Mine," Jack Clark, (c) 2005, ISBN: 0-933994-31-1

INTRODUCTION:

"The California Gold Rush (**1848–1855**) was a gold rush that began on January 24, 1848, when gold was found by James W. Marshall at Sutter's Mill in Coloma, California. The news of gold brought approximately 300,000 people to California from the rest of the United States and abroad."
https://en.wikipedia.org/wiki/California_Gold_Rush#:~:text=The%20California%20Gold%20Rush%20(1848,the%20United%20States%20and%20abroad

The Idaho-Maryland mine operated for over a 106-year period. Where Grass Valley is concerned, beginning in 1849-1850 placer gold found in Wolf Creek, Deer Creek and the Bear and Yuba Rivers, quickly exhausted in the shallow waters, and miner's set their sights on gold-bearing, hard-rock quartz veins and ground mining, known as "load-mining," which grew more rapicly in Grass Valley's new gold-district than any other in the state. "From the exceptional ores of the newly discovered quartz veins, many mighty hard-rock mines sprang up; the Empire, the North Star, the Brunswick, the Idaho-Maryland and others to follow, commanded the landsacpes above and minescapes underneath the ground for more than a century. September 9th, 1850, California becomes the 31st state in the union!

The original Eureka Mine (located in 1851) (on Eureka Hill), and the Idaho and Maryland mines were seperate mines which had one vein in common, known later as the "Eureka-Idaho-Maryland ore shoot." If not for this discovery, the Idaho and Maryland mines would likely not have been developed.

Eureka and Idaho mines

1863: Claim-filing for the Idaho Mine was recorded in May of 1863. But the veins were small and narrow, and the grade was poor and of low value. By 1865 very little more was discovered of workable value. In March 1866, all work stopped and the mine closed until September 1867. (Gold is worth $31.23)

In October 1865, the property was purchased and taken control of by investors, and the name changed to the Eureka Gold Mining Company. (Gold is worth $30.22)

(1869: Transcontinental railroad completion meets in Promintory Point Utah.) (Gold is worth $25.11)

1870: The Eureka mine reached its maximum production, and the main shaft reached 850 feet.(Gold is worth $22.88)

1872-74: The Eureka mine searched for new ore shoots, needed to be found to extend the life of the mine. Shaft sinking stopped at 1,250 feet, when quartz grade no longer warranted further production. (GIW $23.)

1873: During the Idaho Mine's four years of operation 1869-1872. As production slowly increased, water availability became an ongoing issue. Trees were becoming scarce! The Nevada County Narrow Gauge Railroad was begun to haul wood and other supplies in from Chicago Park and Peardale.

1877: Work at the Eureka was uspended. (GIW $ 21.25)

1878-79 The Idaho a new air shaft was dug to 1,100 feet, but the digging struck water, which required new pumps to remove. (GIW$ 20.67)

1880: The idaho reamined the richest and most famous mine in the state. Its surface plant and equipment ranked among the best in the mining industry. BUT, unmusual rainfall during April cause "considerable

flooding" as surface water entered the shafts of the Eureka and Idaho, ending up in the bottom of the mine, but the dewatering pumps could not handle the quantities,so the mill and mine were suspended until the water could be removed. The air cirulation at 1,000 feet level became inadequate.

1882: The CA state legislature banned hydraulic mining, which made further water storage dams and canals to be used for other purposes. The Idaho Quartz Mining Co., entered into a contract with the South Yuba water company to cover the mines needs.
---- (GIW, Gold is worth... AND shall remain at $22.67 until 1933, or for the next 51 years!)

1886: The Idaho ore shoot was heading toward a cross-over of the Maryland claim.

1889: On June 4, 1889, at the 1,000 foot level, workers discovered a fire in the shaft, and workers were esphyxiated or cut-off from assistance. Mine fires are serious because timbers are damp and smolder, filling the mine withtoxic smoke, carbon momnoxide and oxygen deficiency. The fire made underground workings impossible for over 43 days.

1890: The first water shortage to the mine happened in 1890, due to the collection of ice and snow in the water company's ditches. There was not eoungh water to supply both the Empire and the Idaho mines. -- On March 8th, the Idaho Quartz Mining Company brought suit against the Maryland Gold Quartz Mining Company, to determine boundaries between the two mines, which had actually been decided 20 years earlier. But the The Idaho company aserted the disputed line, was the Eureka-Idaho lode. An intrusion on this line, would actually cut into the Maryland (page 45).

1892: "The Idaho Mine was ranked the leading quartz mine in California from 1869 through 1892."

The Maryland Mine

1865: The Mining claim was located in June 1865, however no work was done until 1880, when the Maryland Quartz Mining Co., was formed.

1880-81: a primary tunnel was driven 675 feet to the vein, and then drifts were added. A hoisting works was erected East of the Idaho shaft, and a shaft sunk to 350 feet.

1893: SALE OF THE IDAHO MINE: By this time the Idaho mine had reached the compromise line agreed upon between the two companies in 1890.=, and no other ore bodies were found to dupport the Idaho any longer. Negotiation took place and the parties agree the Idaho Mine would be sold to the Maryland Gold Quartz mioneing Co., for $85,000.00. The agreement included the Maryland firm to buy ALL the equipment of the Idaho firm (page 52) , except for "money on hand, gold specimines in the vault and gold in the mill. A dual-management operation began on May 1, 1893 The mine's name was changed to the Idaho Maryland mine, although the company's name Maryland Gold Quartz Mining Co. would remain the same. This provided many advantages for the latter, including access to three successfulk ore shooits and a shaft down to 1,400 feet nd ll the necesary equipment [and ostensibly the 200 miners familiar with the immediate region. These were very positive impacts for Nevada City and Grass Valley!] "On May 12, 1893, a pocket of gold in large quantities were struck in Maryland ground, as was rick-rock on the 1,500 foot level which was unusually good."

1894: A severe fire damaged pumps, and water began collecting in the lower workings. Within a short time, their entire complex was engulfed in flames. Fortunately, all the miners escaped, but the major buildings succombed to the flames. The major concern was how much water would fill the mine before the pumps could be returned to working order.

3

1897

The Maryland Gold Quartz Mining Company

CAPITAL STOCK SHARES. 500,000.

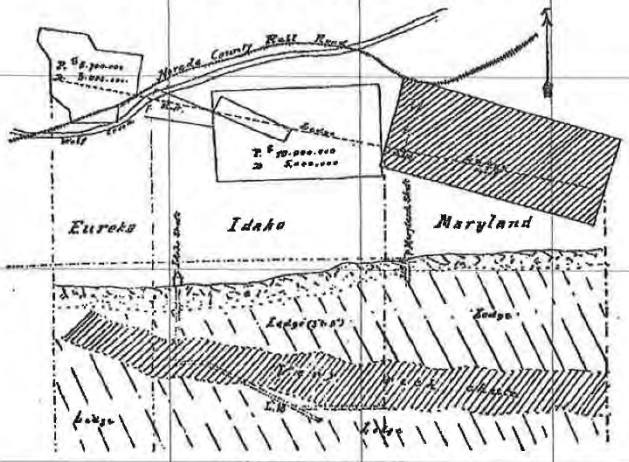
PAR VALUE PER SHARE: $20.00.

GRASS VALLEY MINING DISTRICT,

NEVADA COUNTY, CALIFORNIA.

Map showing the direction of the famous

EUREKA—IDAHO—MARYLAND LEDGE.



Scale—20 ohs. to the inch.

LONGITUDINAL SECTION OF THE VEIN.

FOR SALE.

40,000 SHARES AT $2.00 A SHARE

TO BE USED EXCLUSIVELY FOR THE DEVELOPMENT OF THE PROPERTY.

For further particulars and share subscription inquire of

S. P. DORSEY, Express Office, Grass Valley, Nevada Co.

1894: - THE DORSEY ERA. - The Maryland Co., took control of the mine on February 1, 1894.

1896: a good vein was found at the 1,900 foot level.

1897-1901: The Maryland Mine's major problem became insufficient capitl to maintain the underground workings, and, at the same time, develop new ore bodies. Money was raised that had tobe spent to develop new ore sources in underground veins. However, share sales did not bring enough money from outside sources. Mining continued for the next four years, but production declined every year. A few days before the mine closed in February 1901, a group of mining men conducted an inspection of the lower workings of the mine. "A report signed by the men, is quoted from their sworn statement on February 14, 1901: -- ***"We the undersigned, have made a personal inspection of the Idaho-Maryland mine, Grass Valley mining district, and in our judgement the ledge we saw in the east incline of the Dorsey shaft, and the levels from the shaft, is a continuation of the Eureka-Idaho-Maryland pay shoot of quartz, on its eastward and downward strike, in the regular fissure, and of good size, vis., two to four feet, and appears to be of good quality."***

In February 1901, the Idaho Maryland mine closed and was allowed to fill with water. There were several immediate causes for the closing; lack of capital to develop the mine; cost of triple-handling of ore, high milling costs owing to sporadic flow of ore to the mill, and poor conditions of underground workings. This ended 44 years of continuous mining of gold in this location."

1902: Idaho Maryland Development Company. Following the mine closure in 1901,Dorsey kept the surface workings intact. He became ctive in promoting the property. In late 1902, a group of men from Boston became interested in the mine, and sent a mining engineer who compiled a report which proved satisfactory to invetsors. The Idaho Maryland Development Co. was thus formed with a main office in Boston, MS.

1903: The Idaho Maryland Mine was bonded to the Idaho Maryland Development Co., who studied plans to reopen the mine 'with great enthusiasm." The plan decided upon was to reopen the Idaho shaft to the 1,000 foot level and then continue sinking the shaft into an unexplored region of the Eureka-Idaho-Maryland ore shoot. That shaft would terminate at the 2,000 foot level (page 67). However, the overall conditions of the surface and underground workings had deteriorated greatly under the Dorsey regime. The first things were the major repairs of the milling, hoisting and pumping system.

1904: In July, the surface repairs were completed and pumping commenced to dewater the mine. As the waters receeded, it became clear, the shaft timbers were in dire condition and in need of replacement. Due to cost, and time-consumption, the plan changed regarding sinking the Idaho shaft. Instead they would reopen the upper levels and hope to find enough gold to sustain operations while shaft repairs were underway. The 25 year old timbers had become crushed from swelling ground and deterioration. Many olkd stopes. for the next years, tributors work on the mine repairs. (p.79)

1906: San Francisco Earthquake:

1908: NEW ORE DISCOVERED. Two new ore bodies were discovered, which allowed the repairs to continue well into 1911.

1911: WOMEN'S RIGHTS AND THE 19TH AMENDMENT. One thing for certain, the IQMCo., did NOT overlook much ore in their workings, nor did the Development Co. find any new vein structures.

1912:

1913:

1914: *WORLD WAR I, , was an international conflict that began on July 28, 1914 and ended on November 11, 1918*

-- The IMDCo ceased operations in October 1914 at the beginning of WWI. The mine was again allowed to fill with water.

-- CONSOLIDATION BY ERROL MacBOYLE. "In 1914 the IM mine lay idle, with all its underground workings full of water. Late that year, a well-known mining engineer from San Francisco became interested in the IM mine." He made a full study of the mine's records, geology and history while an engineer at the CS Mining Bureau. His study of the mine convinced him that the mine contained vastly greater riches than the $19 million dollars it had yielded prefious owners. He also planned to consolidate all the surrounding mines together with the IM. There was sound engineering in this idea, for veins into adjacent properties cannot be followed. That is why the Empire and North Star companies of Grass Valley had for many years a standing offer to purchase the properties contiguous to their properties. (pp. 72-73.) He knew the Empire, North Star and Idaho-Maryland had sound profitable ore at much greater depths. He arranged to acquire the Union Hill mine, and created the Gold point Gold Mining company. Later, Gold Point Consolidated Mines, Inc was formed to take over, syndicate and acquire additional mines. "The main thrust of the company being to reopen the IM mine!" But, being wartime, raising capital was very hard to acheive. (see 1917)"

1915: PANAMA PACIFIC INTERNATIONAL EXPOSITION

1916:

1917: During 1917 the Metals Exploration Company of New York, acquired the controlling interest In Gold Point Consolidated Mines, Inc. After months of negotiations, one by one, properties were leased with options to buy, including the Eureka, Roanaise, South Idaho, Black Hawk, Union Hill, Gold Point, and Idaho Maryland mines, and several other mining claims. the land involved extended over two miles in length on the Eureka-Idaho-Maryland lode, and embrassed an extensive vein system, the greater part of which was in virgin ground. (see 1919*)

1918: PROHIBITION AND THE GERMAN FLU: "The flu pandemic of 1918-1919 killed between 20 and 40 million people." -- REOPENING THE MINE: A Busy year."

1919: The Eureka mine did not actually become part of the Idaho-Maryland until 1919. *The last property which MacBoyle added was the Idaho Maryland on december 20,1919. A plan then evolved to develop the combined properties. Metals Exploration Co., acquired controlling interest of the combined properties and advanced the funds to equip, open and develop. The name of the new venture was "Idaho Maryland Mines Company." The Metals Exploration Co., intended a new vertical shaft central to the Union Hill, Gold Point, Black Hawk and South Idaho mines for their development. The Idaho Maryland's surface plant was antiquated and had to be completely replaced. So the new shaft idea, was consequently bandoned and the Idaho shaft was reopened and and deepened to the 1,000 foot level, to explore the Eureka Idaho Maryland vein below the thousand foot level.

-- 1919 mine strike: When Metals Exploration took over the consolidated groupo, the Union Hill was the only one in opertion. The plan was to focus on the Lucky Cambridge at 600 ft, the Gold Point vein at

800, croscutting the the Georgia vein at 300. However, the underground work came to a HALT June 13, 1919, when district miners called a generalk work-stop and strike of ALL mines, which lasted two-weeks, during which time water in the Union mine rose to the 600 foot level. Ooperations were permenantly suspended and the mine was allowed to continue to fill with water. All employees were terminated! On June 30, a settlement was reached with the miners. The new wage scale gave miners $4.40 per hour, muckers $3.85, lamorers $3.85 and shaft-men $4.85.

-- 1919 - Rebuilding the surface plant and reopening the Idaho shaft, was the next order of business. The Union Hill plant had become available for processing, and was completely dismantled and moved to the Idaho Maryland site. and changeover from water-power to electricity was made. a 75 foot headframe was erected over the shaft collar. The shafts required vst retimbering for a depth of nearly 400 feet. Dewatering the shaft began September 24, 1919. Huge pumps and piping and other repairs and improvements were necessary, as well. It took threemonths to empty the main shaft to 1,000 ft.

THE 1920S: THE ROARING TWENTIES, PROHIBITION begins Jan. 17, 1920, (ends Dec 5, 1933), and WOMEN'S VOTING RIGHTS.

1920: Reopening the Eureka mine. The Eureka had been worked from the mid-1850s to its closing in 1877. Left behind in the mine, was a great deal of low-grade ore, which it was planned to re-run the materials to recoup minerals. Thus, the water was removed from the Eureka mine simultaneously as the the rebuilding of the I-M surface plant and dewatering of their shft. Underground connections were made between the two mines. But after the time, effort and cost of reopening the Eureka, they found no ore of usable grade, which was very disappointing. It was the most defeating feature of the re-development plan of 1920-21. It proved two things: 1) that the sources who believed there we 50,000 tons of $10 per ton fill rock and unmined ore remained in the Eureks mine were unreliable, and,2) superintendant Watt had not left ANY GOLD in his mine over four-decades earlier. As well, considerable amounts of waste rock had been dumped into the main shafts, as well.

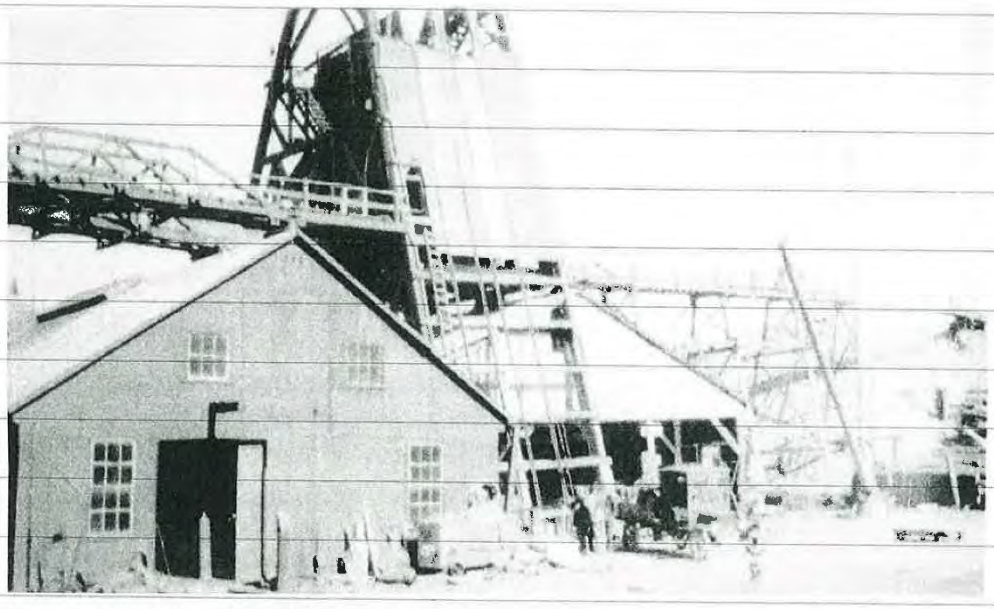
1920: Idaho Maryland surface plant. The surface plant was designed for 100 tons of ore per day and wascompleted by year's end.

1921: All operations in the Eureka ended in late 1921! Water was allowed to refill the shaft to 600 feet, where it periodically overflowed into the Idaho shaft periodically. The plans for the tailings had to be approved by the California Debris Commission before construction and operations were begun!

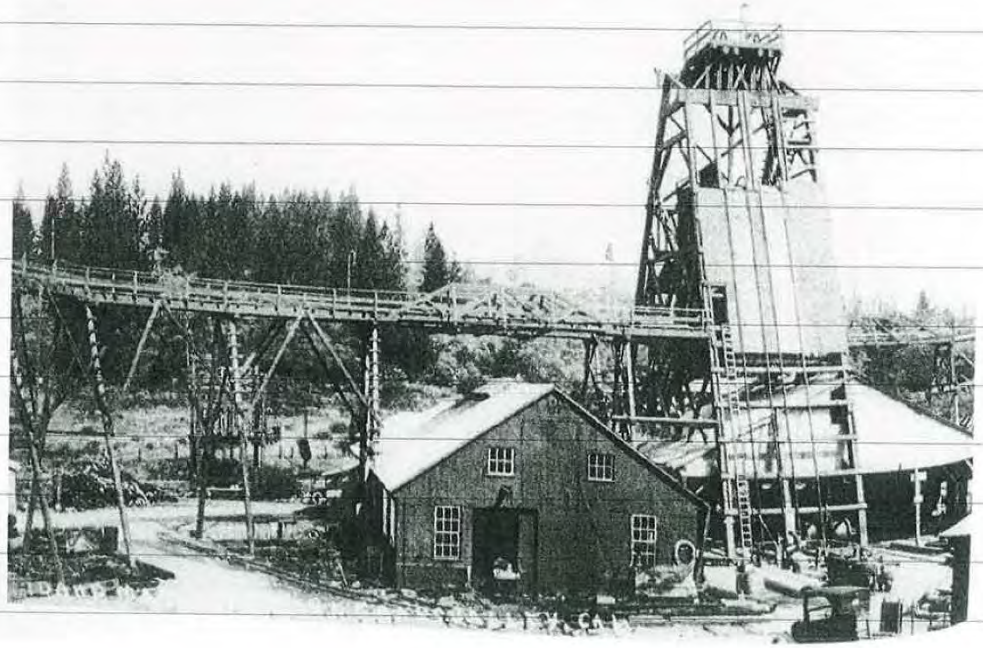
1921: The Miner's Progressive League. In early June 1919, a miners strike had been called against ALL GOLD MINES in the Grass Valley District. But a year later, no changes had been made and in June of 1921, no workers showed up for work beyond hoistmen and pumpmen. No final agreement was made, however, the contract period would extend to June 30, 1922. Surface operations in 1922 are seen in the

photo: I-M headframe.

1920's



Two views of the Idaho Maryland shaft and headframe, along with overhead ore and waste trestles, as they looked in the 1920s.



1922: UNDERGROUND MINING. The upper levels of the Idaho Maryland mine were not considered to be favorable for finding ore. Tributers attempted to "give it a try," but this part of the mine had been thoroughly "stoped" * between 1865 nd 1893 by the Coleman Brothers and again when tributers worked the same area between 1904 and 1914 under the Idaho Maryland Dvevlopment Co. But the digging provided a second escape route out of the mine through the pump shaft. *(*An underground excavtion along a vein from which ore is being, or has been extracted, as distinguished from other excavations such as drifts, raises or winzes.)* A crosscut which turned out to contain massive porphyrite. Between 1,00 and 1,700 feet they ran into a distinct schistose developpment of amphibole schist. "There were no veins structures of any significance found." A strong fissure was found to exist and in places the vein opened up to eight feet in width, but on the whole, the vein was very erratic and very low grade. The gangue mineral consisted entirely of calcite, dolomite and allied minerals, but NO quartze or gold.

-- ADDITIONAL PROPERTIES ACQUIRED: In August 1922 the mine added other properties, the Grant claim, East Eureka claim, Bastian homestead, and the John H. Hansen property. as wellk as the controlling interest in the Black Hawk mine and patents covering the East Eureka and 15 other claims. An agreement was also signed with the Brunswick Consolidated Gold Mining company for rights under the Union Hill group of claims.

--1922 UNDERGROUND OPERATIONS: Many various, crosscuts, searches within the mine tunnels and fissures, at many and varying levels and areas of the mine(s) were found to be mostly low grade stringers in diabase. And, the 1600 foot level was quite disappointing for finding ore. The Canyon shaft ws lowered to 2,122 level on the incline. Generally quartz and gold discoveries remained disappointing through the year.

1923: SURFACE OPERATIONS: The surface plant was generallky in good order, much of which was relatively new. The sawmill was active for underground timber needs. Only 140 men were working the big mine at th time. The mill operated only part time with 15 stamps, as ore would be found, mined, and sent topside.

1923-24; UNDERGROUND OPERATIONS: Work was mostly done in the mine at the lower levels of the mine between 1,000 to 2,000 feet depth, mostly around 1,500. But nothing in the way of value was found, including the so-called Morehouse vein. At 2,350 foot level, the quartz veins were of very low grade material and could not be mined for profit.

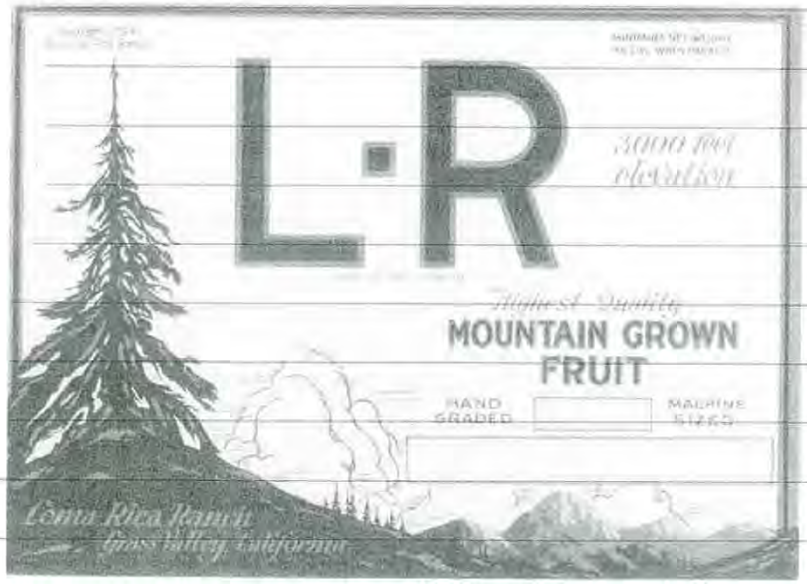
1924: MANAGEMENT CHANGES: Management of the mine changed and the Superintendant wrote in his report: "The efficiency of labor was very low, particularly during the summer months and toward the latter part of the year. The men underground have a fast and set rule as to what embodies a day's work. with this set rule of timed effort on the man's part, and the well-known evil of excessive high-grading (thievary of high-grade ore samples fromm the mine,) at every opportunity, a constant vigil must be kept at every working place. Because of this, an excessive number of bosses must be employed. The above conditions result in high operating costs and low labor efficiency." (as well has high-grade mineral losses.) Some good ore continued to be mined from the 1900 foot level during 1924. And even with continued digging winzes* and sampling, "nothing of any value was dicovered." (*Winze: a vertile or inclined passage that starts from an underground level and and connects to one or more lower levels.) Sadly, the mine failed repeatedly to locate profitable lodes for processing. The I-m mine, with its associated mine-acquisitions and efficient mining proceedures, lost $300,000. for the year.

1925: MINE CLOSING: On February 27, 1925, ALL WORK stopped and the Brunswick Consolidated Gold Mining Co., notified to discontinue their option. The mine was shut down in April 1925 and was left to refill with water. " For six months prior to the cessation of work in April 1925, the available rich ore had been "gutted out" of the mine in anticipation of the closure." From January of 1919 to to

7

September 1925 (7 years) over $2,250,000 was expended on the purchase, reopening and development of the consolidated properties. During the same time, only $200,000 was taken out in the course of operations. (p. 97).

-- IDAHO MARYLAND CONSOLIDATED MINES, INC. The holding company was incorporated in the state of Nevada for three-million dollars and was called the Idaho Maryland Consolidated Mines, Inc. in September 22, 1925 in Carson City, NV. Following the closure of the Idaho-Maryland mine in 1925, Errol MacBoyle set out to raise money to keep the pumps going and prevent the underground workings from filling with water. He was certain the gold mine would be a good producer if properly operated. Two long-time friends loaned him the money to keep the mine operating. First a holding company was formed to acquire the holdings of the Metals Exploration Co., which consisted of over 700 acres of of land that included the Eureka, Idaho Maryland, Union Hill, Gold Point, Black Hawk ans South Idaho mines. The purchase was in excess of $2.5 million dollars.



In spring 1926, Errol MacBoyle ordered a fruit-crate label for pears on his Loma Rica (Rich Hill) Rancho.

1926: START OF OPERATIONS: Most of the equipment from the 2000 foot level had been removed, and timber repairs were neglected in several areas. Further deterioration of underground workings took place between the time operations were suspended (in 1925) and when the new the new Idaho Maryland Consolidated Mines company took over. -- When the actual operations began on January 1, 1926, under MacBoyle's management it was estimated to take six months and $50,000. dollars to open the underground workings so that ore bodies would become accessible. It also was estimated that an additional six months and $50,000. would be needed as an operating fund to carry the properties until enough ore was produced to keep the mill working at its capacity of 2,000 tons per month. But the former miners from the site, secured "tribute pitches", or leases and went right to work, which greatly reduced start-up cost, and and expidited the reopening. Twenty-five men were selected, and divided into six

leasing compan ies each with a specific block of ground, on three of six known veins. The other three reserved for company operations. The tributers also agreed to pay for half the powder used and all the worker's compensation insurance. The mine had been rejuvinated by May, mand the costs of rejuvination was $18,000. The tributing program worked, and by June 1926, there had been 2,000 tones of ore milled, enabling the mill to start work sooner than anticipated. Shifts were Night and Graveyard shifts, leaving Day shifts so as not to interfere with hoisting. Between Marck and December, the mine milled 10,415 tons of ore.

1927: Tributers Operations: The tributers program proved a saviour for the minc as well, during 1927, most of which was mined by the tributors and kept the mill running nearly all the time. The ore mined in one particular area was stoped from 6-8 feet wide, and even though the quartz was only two feet wide, the altered diabase and serpantine carried course gold and heavy sulfides. Not all of the groups were equally fortunate. Several other tributor leases found almost no ore in several locations. Recovered ore proceeds were not enough to cover and sustain continued operations.

1927: COMPANY OPERATIONS: Over a period of month concerns were raised about the loss of ore in the mill tailings. The consensus was to add "Fru vanners" to capture the finer sulfide particles from the slime. These engineers alsoagreed that Idaho Maryland ore "could not be treated efficiently by the flotation process." The decision was made to use ball-mill crushing and then flotation. The mine kept attemptingto follow new leads, but most turned out to be short-lived, and we abandoned or discontinued for development of other areas. So, ore production decreased in the latter part of 1927, attributed to several facttors. Bullion sales for the year were valued at 491,000 and concentrates totalled $109,088. (Fru Vanners: *https://en.wikipedia.org/wiki/Vanning*).

1928: UNDERGROUND OPERATIONS: In January of 1928, was found that MacBoyle called "It is one of the strongest and best looking veins ever opened in the Idaho Maryland or other mines in the district. " It was a vein that had been close to discovery by two other mining groups earlier, who stopped short of it, and it had not been again tested since 1924. All work on other company veins halted to focus on this new one. -- TRIBUTORS: During that year, the number of tributers was reduced to only twelve men and was confined to the Morehouse vein. The ore averaged $8-10 per ton. -- Surface operations: In July the headframe began to settle and moved. All mill and underground work were halted until repairs could be effected. This included truing the headframe, extensive concrete work and repairing and retimbering tunnels.

1929: In January new financing was sought to further develop active veins, explore for others, expand mining facilities and reopen the Brunswiick mine. MacBoyle spent a great deal of time in New york and San Francisco seeking further investment dollars. Money was tight at the time, and his attempts met with failure. The IMCM, inc, sold $500,000. in comon stock. The shares became available April 16, 1929. The stock market crashed in October, and triggering the Great Depression of the 1930s. From August of 1929 to 1933, The Great Depression was a severe worldwide economic depression that took place mostly during the 1930s, beginning in the United States. The timing of the Great Depression varied around the world; in most countries, it started in 1929 and lasted until the late 1930s. As a reult, the mine stopped other work, and focused on the No.1900 ore body exclusively. -- UNDERGROUND WORK: In February, all tributes or leases were terminated, with the exception of two. The company focused their entire attention upon the No. 1900 vein throughout 1929. It also became necessary to rebuild the wooden hedframe, due to its age and weakened condition, with many timbers showing cracks and dry rot. It had been used at the Union hill mine, then dismantled and moved to the Idaho shaft by Metals Expolration Co. Underground mining was discontinued for nearly a month and resumed in late SeptemberWater pumps were operating daily as other repairs were continuing. -- MILLING OPERATIONS: There were 17,241 tons milled during 1929 with a recovery of $155,for an average of $9.04 per ton.

THE 1930S: THE DEPRESSION AND THE DUSTBOWL

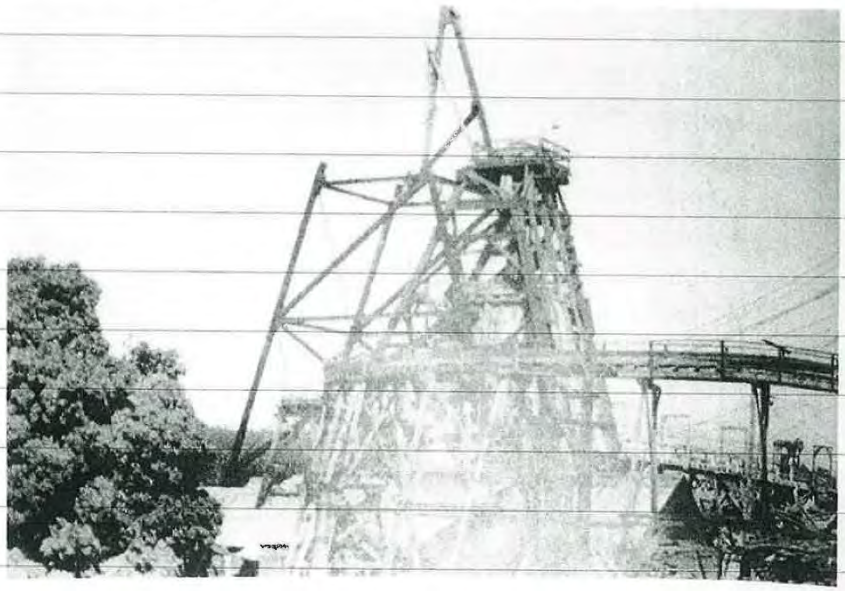
1930: UNDERGROUND DEVELOPMENT: (and worker's compensation insurance:) and MILLING OPERATIONS: Mining operations continued to be a problem. Experiments to reduce the tailing losses were unsuccesful.Inefficient milling capacity began to create restraints on underground ore production, and this kepot the overhead cost at $10. per ton. In October the company began modifying the Brunswick mill, in order to double ore production.

1931: MILLING OPERATIONS: The Brunswick 20 stamp mill began operation in January with only marginal success. Tailing losses were still high. **"The Kraut flotation cells were perfected to handle this specific type of ore,and especially the TALC in the ore!"** -- UNDERGROUND OPERATIONS: The vein numbering system was changed in 1931; the original Eureka-Idaho-Maryland vein was changed to the No.1 vein; the Dorsey vein was changed to No. 2 vein, and the No. 1900 vein was changed to the No. 3 vein, and the NEW footwall branch of the No 1900 vein became No. 4 vein.

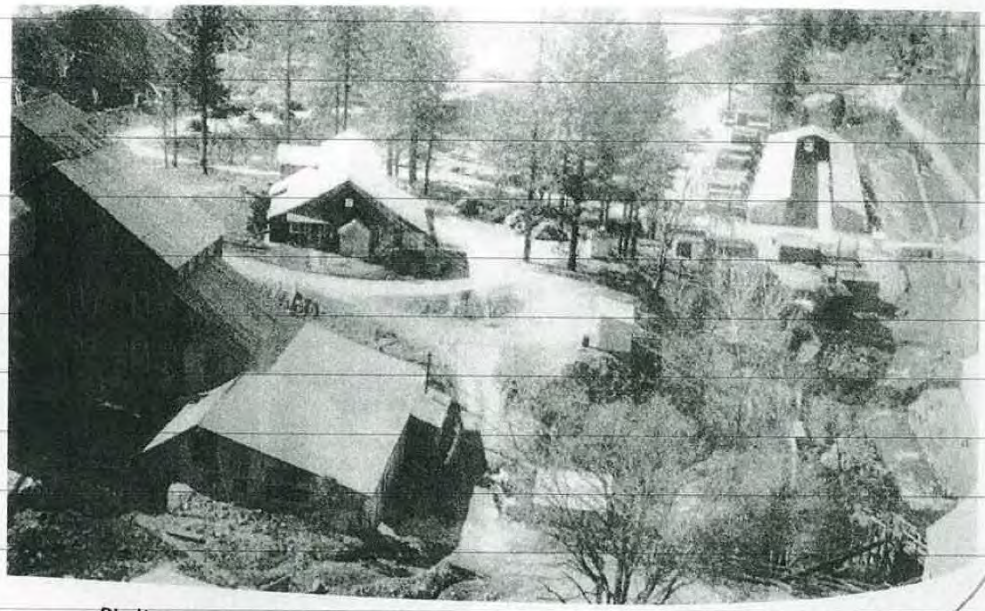
1932: SURFACE WORK: In 1932 the corporation made great strides in upgrading the surface works. a locomotive train of ore cars were added to move materialthe NC Narrow Gaughe ran a spur onto the mine for the delivery of lumber for the mine and mill. A new 105-foot high steel headframe was erected. a 200-ton-capacity ore and waste car was constructed on the East side of the head frame to remove material. added to remove material. Underground mining was halted while the other work was done. But on November 1, 1932 as 200 men returned to work the tunnels and mill opoerations. -- UNDERGROUND OPERATIONS: As the year continued, a major problem came about in the form of "economic handling of waste rock." General technical improvements were added to help in greater recovery of ore and concentrates. -- FATAL INJURY: On December 8, 1932, Frank Bennett wqas standing on a ladder, and came in contact with a 4,000 volt electric wire and fell about ten feet to the ground. He had received severe electrical burn on his left arm and hand as well as serious head injuries. He died that evening without regaining consciousness." (page 124). PRODUCTION: during 1932 58,245 tons of ore were produced, 37,000 of which were milled at the New Brunswick plant, and 21,000 tons at the Idaho Maryland mill. The gross gold AND SILVER recovered from both mills was $449,470. The average loss in the tailings at both plants was $1.14 per ton, or $66,400. for the year. Total expenditures for the year were $456,000. The profit before taxes, depletion,depreciation or interest-on-debt owed to the Idaho Maryland Consolidated Mines, Inc, was $470,172.00. (Therefore, at $20.67 Price of Gold nationally, The mine(s) yielded 22,746. ounces of refined gold. *[Divide this by 58,245 tons of ore, results in 2.5 ounces per ton. (https://onlygold.com/gold-prices/historical-gold-prices/]* Gold was $20.67 per oz. in December.

1933: (In 1933, as part of legislation to stabilize gold value during the Great Depression, the Mint stopped producing gold coins. The legislation also banned private ownership of gold coins and bullion. The law changed in 1974, but the Mint no longer used gold for circulating coinage.) (Loma Rica airport started:) -- Errol MacBoyle took a six month leave of absence from the mine, with full pay beginning January 10th, "for his conscientious devotion to the corporation for six years without taking a vacation." The mine was forced to cease operations for a week in late January, due to a lack of water. The Cascade ditch had become clogged with ice and snow, cutting off water flow to the mine reservoir. At the same time, 4' to 6' snow drifts closed the roads between and around the I-M (Idaho Maryland) and Brunswick mill. -- **DEVELOPMENT WORK: For reasons of underground waste-management, slowing development of new ore sources, the proposition was forwarded to sink the New Brunswick shaft to a depth of 5,000 feet. Dire needs for better air-circulation at the lower depths became a paramount concern.** -- Reopening the Brunswick mine in 1933: In July, the IMMCorp leased the Brunswick mine from the IMCons.M, Inc., for a five year term. This agreement included,"a royalty of 10 percent of the gross recoveries of gold and other precious materials, with a minimum royalty of $500 per month." The task of reopening the Brunswick mine began August 15th, with months needed to reopen the caved-in tunnels and other demands, employing workers three shifts a day, six days a week. The mine also had to

ADDED 1932 STEEL HEADFRAME



Steel headframe being constructed over existing wooden headframe.



Bird's-eye view of the office, sand dam, timber storage, and employee garages next to Wolf Creek. Idaho Maryland Road is at far right.

be dewatered, and other major rebuilding needed to be performed, as well, including significant retimbering. The payroll rose to 300 employees in 1933 due to the demands upon infrastructural improvements. The annual profit that year was $296,083. But, the operating company had debts of $3,500,000. to pay off. **(GOLD IS WORTH, for the first time in 51 years, $32.32,** not, $20.67)

1934: The year began with Prohibition ending after 13 years. (December 5, 1933) (Gold was $32.32 per oz. in December 1933). -- **"On January 30, 1934, President Franklin Delaon Roosevelt devalued the dollar and gave the world a standing offer to buy gold according to the needs of the international trade. He fixed the value of the dollar at 59.06% of its former equivalent, and on this basis a price of $35 an ounce was established for international dealings in gold."** -- Errol MacBoyle was certainly pleased with the $14.33 increase in gold's value! In August, Mr. MacBoylr was elected the new chairman of the new board!

-- NEW MILL AND CYANIDE PLANT (and process!). Despite heavy debt, continued improvements were incorporated into the mine and it's collive merged properties. The cyanide plant became operational in March and the concentrates from both mines were processed right away. The 'fines' were reground from #35 mesh screens to #100 mesh at the mill. These concentrates were then pumped into the threelarge cyanide treating vats containing dilute solution of sodium cyanide. The cyanide dissolved the fine-gold, allowing the other minerals to fall m out as waste material.The gold percipitated out of the solution by adding zinc dust. The zinc combined with th cyanide, displacing the gold, which settled out as finely divided particals. The precipitate solutions were pumped to the refinery section at the conclusion of the cyanide process. Final treatment occured in the refinery for separation, reduction and retorting, to emerge at last as the finished product -- the gold brick!

-- "ROUND HOLE SHAFT: By 1934 the underground orkings had extended eastward over 8,000 feet (1.3 miles) from the main shaft. Therefore a decision was made to sink another shaft, closer to operations. The new shaft would provide better ventilation a second exit, and to reduce time getting men back to work areas. Th shaft location was to be at the corners of Idaho Maryland road and Brunswick. The site presented geological problems, because the rock formations consisted of serpantine, goudge, ankerite and gabbro. A nornal square shaft, would reguire blasting, frilling, and considerable timber to maintain. but because the shft would not be used to hoist ore nor waste-rock, the shaft would be a single-compartment using a 60" (5') diameter experimental core-drill, which was fabricated at the I-M shop. Water was provided to keep the drill cooled. Some cores measured nine feet in length. The "round-hole shaft" advanced 173 feet in 1934. (It was completed in March of 1936, at 1,125 feet in depth.) The serpantine wall rock remained stnding without any timber. *[Photo of two of the 60" cores taken April 2, 2022 at the corner of Brunswick and Whispering Pines Roads.]*

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1934 - DEVELOPMENT WORK: Development in the various shafts, tunnels and raises, totaled 12,488 feet, from which 32,380 tons of ore were produced. Of this total, half were driven at the I-M mine. A total of 5,601 feet were driven at the Brunswick that year. Also, during the year, numerous mine accidents took place, most consisting of falling bodies of rock in the shafts and tunnels, hitting unsuspecting miners before they could get out of the way. Most died of their injuries.

1935: Errol MacBoyle to the U.S. Bureau of Mines Advisory Board. On July16, 1935, Idaho Maryland Consolidated Mines, Inc. merged with its operating compny, Idaho Maryland Mines Co. This streamlined the corporate organization under which the properties were owned and operated, resulting in a more economical and efficient organization. The name of the organization was changet to "Idaho Maryland Mines Corporation, under the laws of the state of Nevada. Further injuries and fatalaties continued into late 1935. (Gold remained fixed at $35.00 per ounce.)

1936: During the year the corpotation entered into a lease-purchase agreement with Errol MacBoyle for the operation and maintenance of the Loma Rica ranch and other properties thereby relieving the corporation from expense and liabilities for their operation. Mineral rights under the ranches were retained by the corporation. Loma Rica translates to "Rich Hill." Of constant concerrn were the problems of fresh-air circultion throughout the collective mines underground, and clearing and replenishing clean air on a full time basis to the 1,300 foot level and beyond, across hundreds and thousands of feet laterally throughout the underground acareage.

1937: Wages and working conditions, opened the year, as labor unrest began at about the same time, as laborers and mine-workers goals were to replace the previous "league" as the sole agency for the purpose of collective bargaining for wages and working conditions. The comopany closed the Old Brunswick mine on April 5th, stating the ore therein was marginal and the closing was for economic reasons. The union said the closing was "a lockout of 80 union workers." (page 158).

-- THE LOMA RICA AIRPORT: Started in 1933. By law, the gold and silver was to be shipped directly to San Francisco to the U.S. mint, as required by the National Gold Reserve Act. Errol MacBoyle, created the airstrip specifically for the safe transportation to Mills Field, later renamed the San Francisco airport."

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-- HIGHGRADING: "High-Grade: (1) Any rich rock or ore, usually quartz with visible free gold in which an abundant amount of gold is showing; (2) To steal gold from a mine. "High-Grading; " The theft of specimen gold by mine employees. "high-grader" One who steals and sells or otherwise disposes of high-grade or specimen gold.

-- STRIP SEARCHING MINERS: "An interesting aspect of the (legal) hearing dealt with 'highgrading," which was explored extensively. Several men expressed strong disapproval of the "double-dry" system that the m ine(s) used to minimizing high-grading. It was stated that miners were required to remove their work clothes in one room then walk naked to the shower room, then walk naked to another room where their street clothes were hung. It was no deemed unreasonable to have rules to prevent high-grading, but miners felt it was undignified to compel men to strip, as they had to do at the mine. This system was practiced at nearly all of the mines. Deputy State minerologist John F. Bongard, minc investigator for the U.S. Bureau of Mines, testified that he and U.S. Secret Service agent Charles B. Rick had been investigating illegal gold transactions throughout northern California. He stated that two men from Nevada County had been convicted as part of an illegal gold-buying ring. He indicated that high-grading was wide spread, ranging from $400,000 to $500,000 each year. He estimated the yearly amount of high-grading from the Idaho Maryland and Brunswick mines to be about $250,000." ("Gold in Quartz," pages 158-159).

-- PRODUCTION (1937) Combined production of the Idaho marylnd and the New Brunswick mills averaged 1,000 rtons daily, the I-M averaged 300 tons daily, and the New Brunswick averaged 700 tons. Over the past year, 305,107 tons of ore were produced from Grass Valley opertions. (excludes Forbestown and bullion mine figures...) Numerous questions had been asked by stockholders regarding the ore reserves, continuity of ore bodies, and the life of the mine. The latter question was answered by MacBoyle in this manner: *"As to the probable life of the mine, from 1926 to date (1937), the Idaho Maryland properties have produced approximately $15,000,000. Most of this amount has come from above the 2,000-foot level, from extensions of old veins and ore bodies, or new veins being found. From a geological standpoint we believe that many new veins and ore bodies will be discovered in the large area of highly mineralized zone now controlled by the company. In the past the Idaho Maryland veins and ore bodies have always been larger, more continuous and richer than any other in the district. In view of the fact that other mines in the district are now working at of 10,000 feet on the vein (laterally), and and vertical depths of over 4,000 feet, as compared to depths of 2,000 feet at the Idaho Maryland, there was every reason, geologically and otherwise that the Idaho Maryland-Brunswick properties would be profitably operated for years to come."*

1938: (Orsen Welles broadcasts "War of the Worlds.) The unusually harsh winter weather caused considerable damage at the new Brunswick mine. Several sections of the trestles that supported the tailing flume between the Idaho Maryland mill and the tailings were blown down in February winds. The surface properties of the company at this point comprise a solid block of 2,180 acres, or about 3.3 square miles. -- For several years the ultimate objective had been to connect the I-M and New brunswick mines together underground. Finally, in 1938 development funding became available and the 8,000-foot-long project was started. Work began drifting east on the No. 1 vein near the No. 30 winze on the I-M 2000 foot level. The reasons for connecting the two mines together underground were to provide an emergency exit from the lower lrvels of both mines, and to have the ability to provide natural ventilation and to service both mines from either shaft. The long drive would also explore the downward projection of several Brunswick veins.

1939: (September 1, 1939 WWII begins.) Costly curtailment of mining and milling operations had occured in past years because of heavy snowfalls clogging the Cascade ditch and cutting off water flow to the mine reservoir. -- During 1939 the large Loma Rica reservoir was constructed to alleviate the above problems. Thjis 13-million gallon reservoir had sufficient storge to meet ll water needs, especially in the event of a watyer outage. A large power shovel was used to dig the reservoir, and mine personnel were used in all phases of construction. the reservoir was constructed at a cost of $30,258. The reservoir served the Old Brunswick, New Brunswick and Idaho maryland mines. It also provided water to the Loma Rica Rancho. A rock walkway extended out over the water to a glass-enclosed gazebo. The valves controlling the various pipelines were located beneath the gzebo floor. -- The major unusual expenditure for the year was for sinking the New Brunswick shaft from the 1500-foot level to the 2400-foot level, and concurrently extending the 2000-foot level of the Idaho Maryland to connect with the vertical shaft at the New Brunswick 2300-foot level. THIS REFLCTED THE GENERAL OPINION THAT NEW ORE WOULD HAVE TO COME FROM THE DOWNWARD EXTENSION OF VEINS NUMBERED 1,2,3,4 AND 5." (page 172). To explore these setionsit was necesary to dewater and retimber the No. 30 winze. It had been sunk 850 feet on the incline to the 2400-foot level, just before the metals Exploration Co. closed the mine in 1925 (14 yers earlier.) Very little mining had taken place at that time, and the winze had to be allowed to be filled with water. -- **PRODUCTION: According to government reports the I-M mines Corp had the largest largest gold production of any quartz mine in California during 1939. The corporation was the second-largest gold mine in the United States. The number of employees had increased from 781 to 831.**

THE 1940S: WWII and the Gold Rush 100 year anniversary.

1940: The greater shaft depth and anticipated production meant increasing the (135 foot steel) headframe size and hoisting capacity. Then in May, the compny embarked upon modernization of the New Brunswick surface plant. National defense need took precedence over over private industry for all available steel, so the headframe improvements were postponed several times until the following spring. Other many and varied projects were affected during this time. -- Following the connection of the two mines, the waste rock from the nNew Brunswick shaft-sinking was trammed over to the Idaho shaft. Thjis permitted greater hoisting time in the New Brunswick shaft. Mine water from below the 2300-foot level was pumped to that level and allowed to flow in an open ditch to the Idaho shaft, where it was pumped to the surface. Several levels were explored but the vein was barren, and the assays were very disappointing. At Christmas, nonetheless, 950 employees received Christmas bonuses. -- PRODUCTION: For the second consecutive year, the U.S. Bureau of mines reported the I-M Mine Corp, was the leading gold producer in California, with approximately 1,000 tons of ore milled daily.

-- Since Errol MacBoyle took over HIS mine in 1925 (18 years earlier,) over two-million tons of ore had been produced with an approximate value of $28 million dollars. *"This tonnage, and developed ore reserves, were developed as a consequence of successful exploration, conducted under a program through which the owner's capital was subject to a relatively high risk of loss. The development program was conducted under the guidance of a competant staff, and backed by the ardent faith of management." - (Author- Jack Clark)* --- [Pat's note: During the past several years, management also co-operated/worked-with a couple other outside mines, including one in Butte County and the Bullion mine in the Grass Valley District. Reporting on these entities is confusing, and played a small role in the overall history of the I-M Mine, therefore I did not take the time to add their data. Purchasing the book "Gold in Quartz," can provide this and other detailed and confusing data to my, this, presentation. The focus here is chiefly on the I-M mine specifically.In late 1940, I-M Mines Corp. investors purchased the bullion mine- Pat]

1941: (December 7th,1941 The United States 'joins' the war after Pearl Harbor attack.)
Entering 1941 the I-M Mines corp., was at it's peak. The combined number of employees (three shifts per day) at the I-M, Brunswick and Bullion mines was 973, and additional miners were being hired. The New Brunswick shaft had reached 3,000 feet in depth.The mine owners were willing to recognize the Mine Workers Protective league as the sole authority to bargain for its members, and agreed to recognize no other union as a bargaining agency for employees. Shortly afterwards in April, 310 I-M Mines Corp. workers convened to discuss the Wage and Hour Administrations order for a forty-hour work week, beginning May 1. The company workforce had increased to over 1000 employees when the strike had occured. War had begun in Europe in 1939 and , although the U.S. had remained officially neutral, it was providing arms to Great Britain and Russia under the lend-lease agreement. In 1940 U.S. polikcy shifted from neutrality to 'preparedness.' The Selective Service Act was enacted to build up the nation's military. Defense plants began building ships, tanks and airplanes, along a multitude of other war materials. Government priorities were quickly placed on steel, explosives and other products needed for the preparedness efforts. Men took advantage of their (strike) time off, to seek higher paying jobs in the shipyards, defense work in Hawaii or in other manufacturing plants. The mine payroll was reduced by 60 , lost to defense work or armed forces enlistment. -- The completion of the new 135-foot-high New Brunswick headframe was able to be erected over the existing 85-foot headframe, because its footprint straddled to older tower, thus, production could continue with minimal interruption. -- On December 7, 1941 the U.S. was drawn into war with japan, accelerating the loss of manpower from the mines to defense industries, over 200 menhaving laft over the preceeding eight months. In December, the I-M Mines corp., finally took full ownership and possession of the Bullion mine.

1942: COMPLETION OF MODERNIZATION: The Brunswick mill was put back into operation in January, after a seven month closure. The mill was completely rebuilt inside during the shutdown during closure. construction of a large concrete ore bin within the confines of the new headframe began during April 1942. It was circular in design and was divided into two sections, the larger portion for ore and the smaller section for waste rock. The structure rose 90 feet above the ground, and the interior was lined with heavy steel rails to protect the concrete from wear. A large shute and diversion gate were located between automatic skip-dumping rails on the headframe and the two bins. This was to direct the ore or waste to the proper storage bin. The large concrete storage bin, often referred to as the 'silo," was because of its unique shape, was completed in mid-June. The corporation sought to include strategic or essential materials in its production, and pursued a diligent search for tungsten in the Union Hill veins within the Brunswick mine, but no profitable deposits were found. The corporation also took an optionon a quicksilver mine near San Jose in the New Almaden district. A fair grade of cinnabar ore was found at the surface, but the deposit was too shallow and lost its commercial value, so the option was dropped. -- The exodus of miners and other key personnel increased dramatically following the Pearl Harbor attack. This affected the underground production and the selection of ore to be mined. Government restrictions on the purchase of pipe, rail, drill steel, explosives and mining equipment also had a great impact upon the gold mining industry. The company's low priority-rating was a major concern in obtaining materials. The management policy always had been to maintain an even grade of ore to be milled at both mines by the lower grade of rock with the higher grade of ore. This made it possible to keep tonnage high by including the marginal grade rock while still making a profit. The life of the mine was also extended by this practice. Now in 1942, the company was being forced to mine ONLY the higher grade ore to offset the decline in production. The New Brunswick shaft-sinking operation was stopped in the early year at a depth of 3,470 feet, far short of the goal of 5,000. Many of the development headings in both mines had to be suspended, and the miners were transferred to work in stopes to keep production flowing.

-- GOVERNMENT MINE CLOSURE - 1942; ON OCTOBER 8. 1942, the War Production Board issued Limitation Order L-208 which closed down all the major gold mines, and also stop all milling of previously broken rock within 60 days. A minimum number of employees were permitted to remain for

General manager Neil O'Donnell and Errol MacBoyle in front of MacBoyle's house.

Errol MacBoyle in front of the stables at Loma Rica Rancho in 1944.

These photos, taken eight months after the government-imposed L-208 closure during World War II, show major damage below the 2400-foot level—80 percent of the Idaho Maryland drifts were caved.

(1944, PAGE 204)

pumping water and for other essential operations. Prior to the issuance of L-208, the I-0M Mines Corp., payroll had bee reduced from 800 employees in December 1941 to just 212 on October 8, 1942. The average ag of the remaining employees was 47.7 years and 43 of the underground workers were 50 years or older. The year 1942 was a hectic one for IMMCorp., as there was a 700% drop in net earnings, with dividends suspended in February.

-- MINERAL MINING ATTEMPTS: Late in 1942, magnesium was needed for the war effort, so the corporation began developing a process to remove magnesium (magnesia) from serpentine rock, which is a silicate. But, for various reasons, little came of the plan due to slow governmental action well into 1943.

1943: *(To help the war effort by eliminating copper from U.S. pennies, the United States Mint came up with a new metallic composition for the one-cent piece. They decided to use steel for the base metal and plate it with pure zinc. Unfortunately, zinc oxidizes over time and turns into a dull and dark gray color.)* MacBoyle spent three months in Washington C.C., in an effort to lift the ban on gold mining, but to no avail. The IMM Corp. kept close to 100 employees on the payroll between the L-208 closing date and June 28, 1943, if only to keep the two mines dry and pumped-out and the main shafts open. When those costs became too high, the payroll was reduced to 60 employees (whereas, in April 1941, it was 1000 workers.) An inspection of the underground levels of the Idaho Maryland was conducted eight months following the closure. In that period of time much of the timber had been weakened by decay and the swelling serpentine ground. A general failure of timber could be seen throughout the mine. Nearly ALL levels showed more than minor damage. At this rate of decay and timber deterioration it was highly questionable whether much of the underground workings would be accessible whenever the mine was allowed to reopen. Unlike the I-M, the Brunswick underground workings, were in good hard ground, with much less damage. -- On October 23, 1943 Errol MacBoyle suffered a stroke which paralyzed hthe right side of his body. He required constant medical care because of his illness. His stroke may have been caused in part by his efforts to reopen the gold mines and obtain approval of the magnesium process. He had spent considerable time in Washington D.C lobbying the two causes.

1944: MINES REOPENED ON LIMITED BASIS: Through efforts of the American Mining Congress—and the San Francisco Chamber of Commerce mining commitee, arrangements were made with the War Production Board (WPB) permision was given to survey the damage sustained by the sustained closures of the Grass Valley mining district.In the inspections, it was found that that major damage had occured in the lower levels of the mine at or below the 2400-foot level, that **80% of the Idaho Maryland drifts were caved-in**! On May 3, 1944, after 17 months of forced closure, the Idaho Marylnd and the Empire Star Mines corporations were grantedpermission to regruit sufficient miners to produce up to 7800 tons of ore per month, to offset the costs of keeping the mines open. The work force was limited to 200 men who were required to be over the age of 40 years or older. The agreements also carried a provision that wages shall be the price of gold shall be fixed unless there is an increase in the price of gold above $35. per ounce. Mining resumed exclusively in the Brunswick mine, where mill rock was more easily obtained. Recapture and timber repair began at the I-M mine, mainly to keep the 1000 and 2000 feet levels open.

1945:
-- ERROL MacBOYLE LOSES CONTROL OF THE COMPANY 1945. *[This part of the story in long related to finances and control, not mining, so I plan to skip this subject, in order to focus on the history of the physical mining history... Pat]*

-- (Atomic bomb dropped on Hiroshima on August 6, 1945. Nagasaki August 9, 1945. WWII ends September 2, 1945)

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-- In the of 1945, as the war in Europe was nearing an end, on Julu 1, 1945, the War Production Board lifted its Order L-208. This permitted gold mining companies to resume operations. There was now a housing shortage in Grass valley and Nevada City caused by an influx of people working at Camp Beale and DeWitt hospital in Auburn. Hiring workers for the mines was gradual, and by the time Japan surrendered in September 1945, the total work force had reached only 100 men. The lack of qualified miners and timbermen continued to plague the company. A sawmill was constructed in the fall of 1945, located south of the I-M mill near East Bennet road, and a substantial log-pond was erected. The sawmill was capable of making lumber for the mine and for sale. As men were discharged from military service, and b y defense contractors, many returned to mining. By the end of 1945, the payroll had risen to 241 men. Most of the men were placed at the Brunswick mine, where mill rock was readily available. Timber crews were assigned to the 1000-foot and 2000-foot levels in the I-M to recapture the drifts that sustained major caving during the shutdown. Due to te extensive swelling, only only the most experienced miners who were used to this dangerous type of mine-work, were chosen. During 1945 there were 2368 feet of new development headings advanced and 543 feet of cave-ins were recaptured.

1946: (Ten more years before these mines will all be closing.)
--Errol MacBoyle, REGAINS CONTROL after arduous legal bttling, returned to his leadership role to the dominant position he had held from 1926-1945. In April of 1946, the Empire-Star mines, inc., suspended all mining operations. A total of 128 men at the Empire and North Star mines were terminated subsequently, leaving only 35 men to keep their four mines free of water. Most of the laid-off men were hired by IMMCorp. --

Due to the losses of so much of the higher value ore reserves in the IMM during the wartime closure, it now became necessary to increase development operations to find new ore bodies.(p.212) To compensate for the loss of the higher grade ore from the Idaho-Maryland and for the inflamatory costs, incumbent on management to increase the tonnage of the lower grade Brunswick ore.

1947: SHORTAGE OF MINERS, and ANOTHER UNSANCTIONED STRIKE: The lack of skilled miners during the postwar erapresented a large problem for management The timber industry had begun to flourish, and many miners quit mining during the summer monthsto fall timber, and then return to the mines during the off-season, which became a great disruption for the mines. -- In May, there was a "wildcat strike" at the New Brunswick on May 8, 1947. "A miner was discharged (fired), when he came to work on the night shift. High-grade ore was found in his "underground" clothes by one of the watchmen, while the clothes were hanging in the dry room. The night shift walked off the job in protest to the firing. At an evening meeting, the accused gave his side of the story that the "gold had been planted in his clothing." The miners present decided not to return to work unless he was reinstateed. The next day, several other miners were also fired, which caused picket lines at BOTH mines! The company thus fired 30 miners. Days later 88 men crossed the picket lines nd went to work. The walkout ended therefter. The current crew of 450 men was able to produce the tonnage equal to the amount of the 800 miners in prewar years. The underground work in the I-M mine during 1947 occured mainly in nthe No.1 and No.2 mines at the 2700-foot level. Also, the new sawmill proved to be very efficient, with a total of 12,201,546 feet of material, so much so, it necessitted the building of a new sawdust burner.



1948: **GOLD RUSH 100 YEARS : January 24, 1848, the "Gold Rush" began 100 years ago.** In March 1948, the Public Utilities Commission issued an order for all heavy-power-consuming industries to reduce power consumptionby 20%, because a winter drought had slowed generation by hydroelectric power plant. The mines were forced to cut back to a five-day work week. This was the first time Saturday was not a work day, cutting time-and-a-half, and reducing the payroll by one-third. This impacted hundreds of miners and local businesses. By mid-year, only four areas of the mine(s) were working. Recapturing accessable ore, became too expensive to execute. In October all work in the I-M mine, with the exception of the 2700-foot level came to a top, and all the miners were moved to the Brunswick mine. In the Brunswick underground, 3,500 feet of rail and pipe and tail were removed, with veins tht were too narrow and the grade of quartz too low to mine. Mining seemed to be facing a stiff decline in the Grass Valley region. Two miners were killed by falling rock and a blasting accident.

During 1948, the company produced over 20,000 tons LESS than the previous year, and the mines showed less value for the year, as well as deprecition, depletion, amortization of patents, as well as the sawmill losing money, added to the shorter work-week and fewer miners. (GIW: Gold was then worth $40.50 per ounce.)

1949: Entering 1949 there was a great need to reduce costs, requiring a reduction in personnel, and leasing-out a large portion of the Brunswick mine. The mine removed all the broken in in the various stopes (holding mareas in the mine), before turning it over to the leasing prties. Lease hol,ders furnished their own lbor, insurance and explosives. Th IMMco., provided tools, timber, hoisting and milling. The lessees received half the of the value of gold produced in their area. The company maintained their rights below the 1600-feet level including the 2700-foot level in the I-M mine, as well as the workings at the 3280-foot level.

-- DEATH OF ERROL MacBOYLE: Errol MacBoyle died in his sleep on November 4, 1949 after a long illness that followed his stroke in 1943. MacBoylewas the one person MOST responsible for the Idaho Maryland Mines Corp. becoming one fo the leadinging gold producers in nthe U.S. His faith in the mines and his perserverance in times of adversity, he was able to succeed when others had failed! He left behind a legacy for the Grass valley-Nevada City community, where "the people' wer foremost in his mind. The I-M's sawmill was subsequantly leased to an outside interest, and the Brunswick sawmill was also sub-let.

THE 1950S: THE BABY BOOM; (Korean War starts 1950, ends 1953.)

1950: The brunswick's old headframe was weakening from dry-rot and age, and a new steel replacement was erected. Leases in the Brunswick continued. -- UNDERGROUND FIRE: On Labor day afternoon, September 4, 1950, a pumpman descended the Idaho shaft to the 2000-foot level to check the pumps. he could smell smoke, so returned to the surface. He alerted the superintendant and safety engineer, whom, when they arrived at the I-M mine-head, the smoke was visible. No one was underground in observance of labor Day. The fire was found to be caused by faulty electrical cables, which were damaged by a falliing timber, and the dampness of the wood restrained a greater ignition. The fire was ended several days later through quick and effective fire-response.

--CORPORATION LOSSES --1950: During 1950 there were 193,357 tons of ore treated at the two mills, with measurebla eturns of both gold and silver. The company operations and the lease-holders produced altogether $1,110,823. But the operating costs added up to $1,306, 347., ending in a loss of $37,414 dollars beforecharges for depletion and depreciation. After all charges were applied, over $216,000. was lost. At the end of 1905, a total of 364 men were employed by the company, above and below ground. In addition, 102 men were employed by seven leases.

1951: THE BEGINNING OF THE FINAL DECLINE: A general change in management of the directorate took place in March 1951 amidst new aoopintments and retirements, including members who had been friends of MacBoyle since 1926 and 1944, and some as far back as 1915. In underground operations, several former source-veins were dipping uniformely into 'virgin' ground where the gold ended. And the quantities and qualities of new discoveries were nothing like the past decades. Operations during 1951 were largely directed toward exploration and possible development of new-found ore bodies, primarily at the 2700-feet and 3200-foot levels. The expeniture for development in 1951 was twice what it had been the year before in 1950. The decision was made to only mine and prosess the higher-grade ore(s) and leave the lower-grade in the mine, in hopes that the market price of gold might raise, or, if American gold were to be release to the free market, the corporation might be in a ;position to go back to retreive the low-grade ore. -- PRODUCTION: There were only 262 men left employed by the IMMCorp., at the end of the year, and most occurring ore was being milled in the New Brunswick mill. Th IM mill only operated part-time. After depreciation and other charges, the net incomewas $31,384., and the sawmills were showing a consistent loss.

1952: NATIONAL NEED FOR TUNGSTEN: After five years of simmering tenions between North and South Korea, the Korean War started on June 25, 1950, whereafter, the American government announced a program to stimulate production of critical, strategic materials in the U.S. The General Services Administration began a purchse program for tungsten, which would run until 1958, or until a supply of three-million units took, place, which ever came first. Small amounts of 'scheelite' were often found in certain veins of the Brunswick, but always lost in the course of mining and milling gold ore, a "loss," management said, "which could add up to *thousands of dollars* each year." Based upon the selling-price of tungsten of $65. per short-tonunit of 60% tungsten content would be an estimated loss of $1.75 per ton.

Subsequently, the goal was put forth to a connection be dug at the 3280-foot level, connecting the mines at the 2830 foot point, a connection which would connect the two mines together at their lowest levels, providing greater air circulation, a second exit, and less costly movement of ore. Once this was accomplished, all mine leases were ended, as costs related to milling had risen beyond being profitable. The same was true of the lumber mills, which alo proved to be losing money again.

1953: -- DECLINING REVENUES, HIGHER COSTS: Develop work continued, but due to the worsening financial situation, development dollars were limited. The mill was always hungry for ore, and management was always clamoring for higher millheads. To conserve blasting powder, began charging contract-miners nine dollars per box to offset prices. The mill was cut back to two shifts per day, and six-days a week. The I-M cyanide plant had to be closed and the concentrates were sent to a smelter in Selby. During 1953 a greater effort was directed at finding scheelite in amounts sufficient to warrant installation of a pilot plant to test a process for full-scale milling.

-- MANAGEMENT CHANGES CONTINUE: President and General Manager Bert Clase resigned unexpectedly in June. The I-MMCorp., joined other gold mining companies in a request for remuneration by the government for the damages sustained as a result of the forced mine closures during the 1942-45 war years. I had become apparent by October 1953, that opperating losses were depleting the working capital to a critical point. One proposal suggested was "a reduction of surface and underground employees from 150 to 90, which meant a coresponding decrease in the consumption of power, supplies, water, insurance, wages, payroll and other general expenses overall. Several parcels of land in the compny's extensive holdings were, not considered important to mining operations were sold off. The IM lumber mill buildings and equipment were sold off, but not the land. The corporations also failed to pay both 1953 and 1954 tax obligations, in hopes future in hopoes that future operations might improve whereby the could catch-up.

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1954: UNDERGROUND OPERATIONS: Twenty-two miners were rehired in February, bring the total employees to 115.=, with mining being done in several locations. Exploration during the year at the 2700-foot level was unsucessful at finding any new ore. -- MINING OTHER MINERALS: Exploration for scheelite continued, and finally sufficien amounts were found to justify the installation of a small tungston milling process. The refind mineral shipments to San Francico slowely proved worth the time, expense and efforts. This was good news, as the poor profitability of gold mining with a low price for gold, and the high cost of processing and operating costs, was making it questionble whether gold mining companies could even continue to operate. (Gold in 1954 was $35.25 per ounce.) The management, stressed by cash-flow, discussed other mining prospects, including potential Uranium and Vanadium mining in Colorado Utah... The company also, at this time, decided to take a loss by abandoning some properties, to reserve cash. Other properties were thusly sold-off, as well. All the marketable timber on the mining properties was sold, and capital stock in the company were liquidated s the market would bear, to help continue operations. --OPERATIONS: During 1954 there were 88,632 tons of ore procesed, compared to 153,634 in 1953. All the ore was hoisted and milled at the New Brunswick site. The lower output was partially due to the decrease on work force from 193 to 114 men.

1955: (November 1, 1955 Vietnam War begins) FINANCIAL WORRIES CONTINUE...: Development funds were dwindling as 1955 opened. Aside from tunghston exploration, all gold mining was performed in the lowest levels of both mines. In February a drastic cutback was made in the employee base, leaving only 60 employees between both mines. --TUNGSTEN MINING: By mid-May, all gold developoment work had stopped and only tungsten exploration was active. In September, a ignificant amount of tungsten was discovered, and some value was gained through it's sale. Tungsten being found, became a short-term financial rescue for the failing IMMCorp coffers. The tungsten ore body in the Brunswick mine was situated within clos proximity to the union hill mine, had been full of water ince it's closing in 1919. This became a major concern. **THE MINING AND MILLING OF GOLD HAS CEASED DECEMBER 27, 1955 AND ALL OPERATIONS TURNED TO THE PRODUCTION OF TUNGSTEN.** The cost of steel, explosives and upplies used in mining had risen to the point where gold mining was no longer profitable. Unlike other businesses, there was no way to pass on the increased costs to the consumer. The price of gold was fixed at $35.00 per ounce ($35.15...), and it was sold directly to the U.S. Mint in San Francisco. IMMCorp. suffered devastating losses in 1955.

1956: THE YEAR OF REINTRENCHMENT: Now that gold mining had ceased, the future of the mine focused entirely on the development of tungsten mining. Men began removing equipment, trolly motors, ore cars, mucking machines, drills, hoses, slushers, etc from all levels of both mines below 2,000 feet level and including the 3280-foot level. All pumps were left in place and pumping continued. The 45 winze between the mines was aslo llowed to flood after all the equipment had been removed. The tungsten mill had been completed in March 1956 and had a capacity of 74 tons in 24 hours.

On September 25, 1956, orders were received from the board of directors to seace nearly all tungsten production, abandon the Idaho shaft, and allow both mines (all their associated diggings), including the Brunswick 1450 level. This action would reduce the number of employees to an absolute minimum consistent with with the above program. Subsequently, the above ground plant of the Idaho Maryland mine was sold to Oro Lumber Company. That sale included the mill, cyanide plant, headframe, hoists, compressors and several buildings, the the same company who had purchased the lumber mill previously.

Subsequently, the Union Hill, Brunswick and Idaho Maryland mines were were ordwred by the California Division of Industrial Safety to close all mining leaving only a skeleton crew to remove and sell-off equipment.

(Above) New Brunswick mine in March 1956. (Below) Same view in 2004.

Cover page of sales brochure for the 1957 auction of New Brunswick mine equipment.

1957: -- A SUCCESSFUL AUTION:
After the mine closed a salvage crew continued to remove all equipment from underground. On March 15, 1957, the last cage of of items was hoisted to the surface in the New Brunswick shaft. The electrical power to the mine was then disconnected from the substation. These two great gold producers became a casualty of the los price of gold and an inflated economy that left gold mining in its wake. On April 30, 1957, Nevada County Tax-Collectors announced the news that the county of Nevada and two school districts had received a check for $102,291.98from the IMMCorp., for payment of local taxes. Then, beginning on May 21, 1957, a two day auction was held to liquidate the reminder of the equipment. The auction was a huge success. -- (The "Gold in Quartz" Book ends at the close of 1957.)

THE END

1958:

1959:

THE 1960S: THE COLD WAR
1965 BEGINNING OF THE GAY RIGHTS MOVEMENT
July 20, 1969: moon landing

THE 1970S: PEACE, LOVE, DOPE and WATERGATE

THE 1980S:

THE 1990S:

THE 2000s:

THE 2010s:

THE 2020S: REOPENING THE IDAHO-MARYLAND MINE?

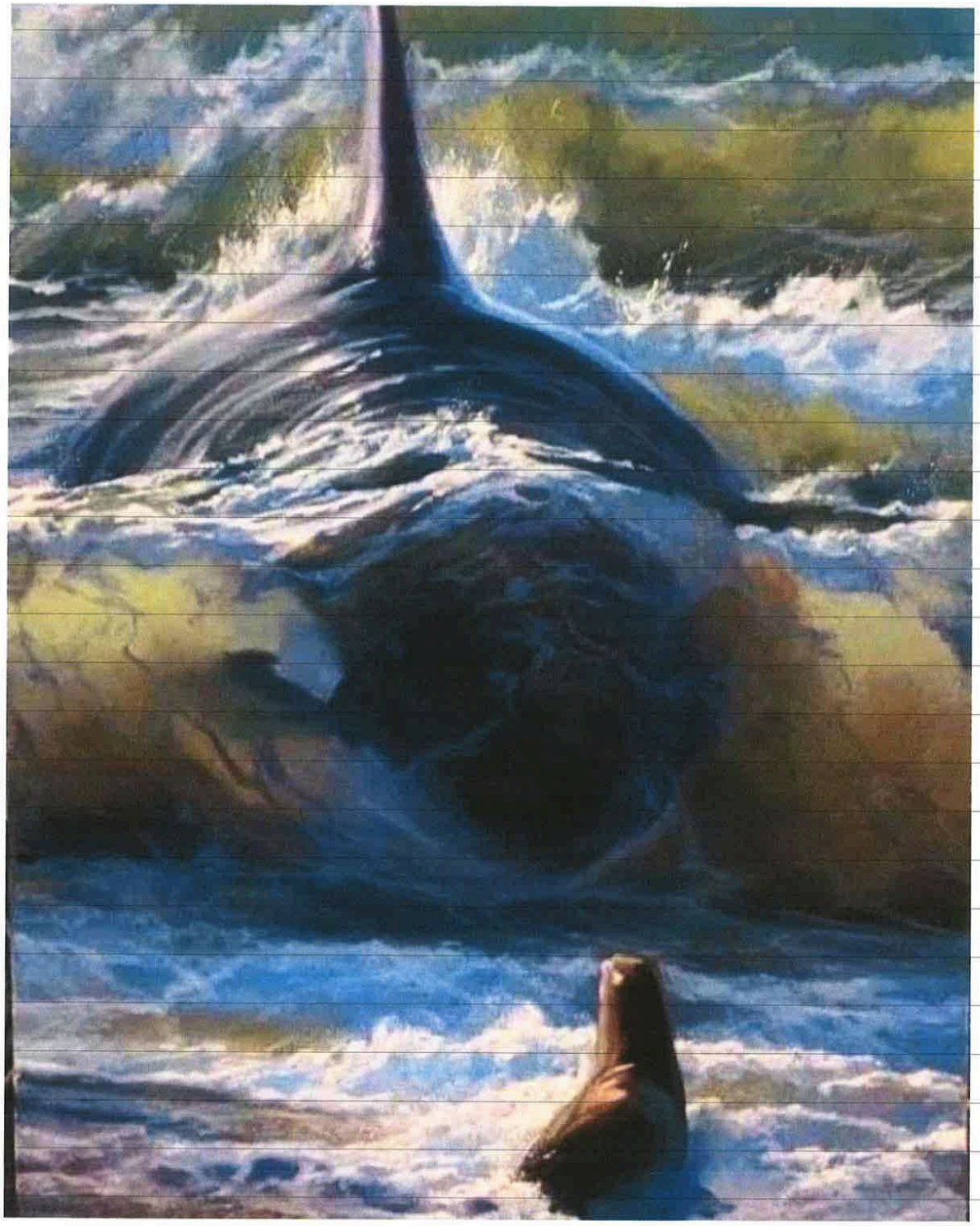
2021:
2022:
2023:

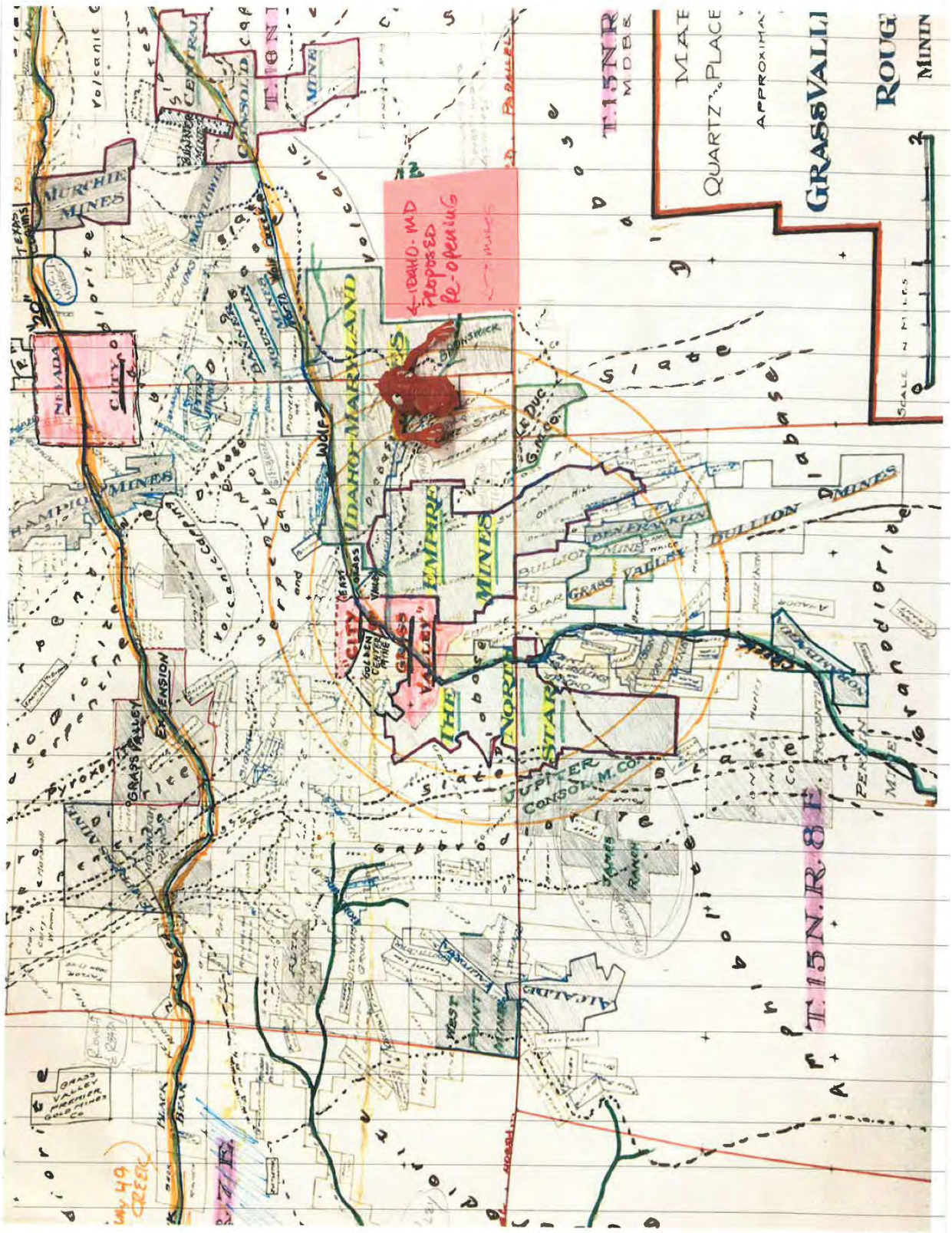
https://www.mynevadacounty.com/DocumentCenter/View/14900/Loma-Rica-Ranch-Report-PDF

https://www.cagenweb.org/nevada/data/nccorp_index.html

Guide to the Empire Mine State Historic Park Collection
http://www.parks.ca.gov/pages/1080/files/fa_383_001.pdf

"RISE GOID— HAS A PIAN "




IDAHO-MD
PROPOSED
RE-OPENING
IDAHO-MARYLAND
MINES
EMPIRE
MINES
THE
NORTH
STAR
MINES
GRASS
VALLEY
CITY
MURCHIE
MINES
HAMPION MINES
BULLION MINES
BEN FRANKLIN
GRASS VALLEY
QUARTZ PLACE
GRASSVALLEY
T.15N.R.8E.
T.15N.R.
JUPITER
CONSOL. M. CO.
ALCALDE
WEST POINT MINE
GRASS VALLEY EXTENSION
BLACK BEAR
WOLF
LE DUC
G.M. CO.
STAR
SCALE IN MILES

INDIVIDUAL LETTER 785: THOMAS JACOBSEN

Response to Comment Ind 785-1
The commenter provides information and resources related to the gold mining industry and local history, but does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Response to Comment Ind 785-2
The comment appears to be primarily focused on airborne asbestos and water quality concerns related to the proposed project. For asbestos, please see Master Response 22 – Conservatism Used for Asbestos Assessment and Master Response 23 – Adequacy of Asbestos Sampling. For water quality concerns, please see Chapter 4.8, Hydrology and Water Quality, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 785-3
The comment very generally expresses concerns related to underground water resources and quality of life. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Quality of life concerns are outside the scope of CEQA – please see Master Response 1.

Response to Comment Ind 785-4
The commenter notes observations of common wildlife species on the project site. Please see Response to Comment Ind 585-18.

Response to Comment Ind 785-5
Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 785-6
Please see Master Responses 1 and 2 for quality of life concerns, which are outside the scope of CEQA.

Response to Comment Ind 785-7
The DEIR found that all traffic-related impacts of the project would be less than significant after mitigation, with the exception of the impact to the intersections at Brunswick Road and State Route 174 (level of service impact) and Brunswick Road and Sutton Way (queueing impact), which would be significant and unavoidable even after implementation of mitigation. (DEIR, p. 4.12-56.)

Response to Comment Ind 785-8
The comment is outside the scope of CEQA – please see Master Responses 1 and 2.

Response to Comment Ind 785-9
Please see Master Response 8 – Mine Waste Characterization and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Ind 785-10
Please see Master Responses 1 and 2 for quality of life concerns, which are outside the scope of CEQA.

Response to Comment Ind 785-11

Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 785-12

The comment does not address the adequacy of the DEIR and has been forwarded to the decisionmakers.

Response to Comment Ind 785-13

The comment appears to express general opposition to the proposed project and does not address the adequacy of the DEIR. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 785-14

The comment appears to express general opposition to the proposed project and does not address the adequacy of the DEIR. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 786

From: Tom Krauel
To: bdofsupervisors
Subject: Idaho Maryland Mine Proposal
Date: Tuesday, March 8, 2022 2:04:08 PM
Attachments: Idaho Maryland Mine signed letter.pdf

not County residents

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Ind 786-1

Please review the attached letter of opposition to the Idaho Maryland Mine proposal.

Thank you for allowing us to comment.

Tom and Nancy Krauel

3/5/2022

We are currently looking at the Grass Valley area as our area to retire and spend the rest of our lives in. Our plans are on hold until we see a decision on the Idaho-Maryland Mine Proposal.

Major decisions are based appropriately on risk verses benefit. The benefits of moving forward must outweigh the risks.

Have you honestly weighed the risks verses the benefits of the Idaho-Maryland Mine Project?

Benefits:

1. Jobs and any growth associated with those jobs provided
2. Potential improvements in infrastructure

Risks:

1. Potential ground and surface water pollution
2. Potential air quality degradation
3. Encroachment and impacts on nearby wetlands
4. Loss of open space environment
5. Increased traffic
6. Housing shortages
7. Increased cost of living by greater demands on current resources
8. Worse medical care due to greater demand on current providers
9. Worsening crime by by a sharp increase in population and strain on current resources
10. Population increase, which degrades the local environment
11. Loss of local character due to all of the above
12. Loss of appeal due to loss of character and all of the above
13. Population demographic changes as families exit due to loss of appeal and quality of life
14. Loss of tourism

Ind 786-2

Clearly, the risks outweigh the benefits.
Please stop the Idaho-Maryland Mine Project from moving forward.

Thomas and Nancy Krauel
TMF/C 3/8/2022
Nancy Krauel 3/8/2022

380 County Road 73
Alturas, CA 96101
crowderflat@hotmail.com

INDIVIDUAL LETTER 786: THOMAS KRAUEL

Response to Comment Ind 786-1

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Ind 786-2

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to the project, some of which are outside the scope of CEQA (e.g., housing shortages, increased cost of living, loss of local character, loss of appeal, loss of tourism) - please see Master Response 1 and Master Response 2. Regarding water pollution concerns, please refer to Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding wetland impact concerns, please see Chapter 4.4, Biological Resources. Regarding increased traffic concerns, please see Chapter 4.12, Transportation. Regarding concerns about increased crime, please see Chapter 4.11, Public Services and Utilities (see Impact 4.11-2 concerning law enforcement).

The comment expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 787

From: Tom Maher
To: bdofsupervisors
Subject: Rise Gold Mine
Date: Saturday, February 12, 2022 4:40:14 PM

Dist 2

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Ind 787-1

I am absolutely opposed to the opening of Rise Mine in Nevada county. I am a voter of this county since 1983. I have paid property taxes and sales tax here all these years. I believe the mine opening will harm our air quality as well as our traffic and water quality. Water is a precious resource and should not be used on mining in this county. Sincerely
Thomas Lawrence Maher
16142 Sharon Way
Grass Valley Ca 95949

Sent from my Verizon, Samsung Galaxy smartphone

INDIVIDUAL LETTER 787: THOMAS MAHER

Response to Comment Ind 787-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns related to the project - please see Master Response 1 and Master Response 2. Regarding water pollution concerns, please refer to Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding traffic concerns, please see Chapter 4.12, Transportation.

The comment expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Individual Letter 788

From: Thomas Prato <tom@boxpower.io>
Sent: Monday, April 4, 2022 4:27 PM
To: Idaho MMEIR
Subject: Idaho Maryland Mine

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Hello Matt,

Ind 788-1 I am emailing you today to express my concern regarding the reopening of the Idaho Maryland Mine. I am VERY concerned about the proposed plan to pump out groundwater of the existing mine and the effects that the continuous pumping will have on streams and the available groundwater for residents. Many residences in the area get their water from wells, which could be negatively impacted by the removal of millions of gallons of ground water. I am additionally extremely concerned about the conduct of individuals in the company Rise, who had previously filed for bankruptcy due to damages resulting from environmental violations.

Ind 788-2 All in all I think the potential consequences of reopening the mine FAR outweigh any potential benefits.

Best,
Tom

Tom Prato | Senior Project Engineer
530-802-5477 ext. 714
12438 Loma Rica Dr, Suite C Grass Valley, CA 95945
www.boxpower.io

1

INDIVIDUAL LETTER 788: THOMAS PRATO

Response to Comment Ind 788-1

The comment does not address the adequacy of the DEIR, but rather expresses concerns related to groundwater impacts. Please see Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 788-2

Please see Master Response 3 – Operator Responsibility.

Individual Letter 789

From: nursefrench2004 <nursefrench2004@aol.com>
Sent: Sunday, April 3, 2022 8:46 AM
To: Matt Kelley
Subject: Idaho Maryland Mine project

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3 April 22

Matt Kelley, Senior Planner
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-7902

Mr. Kelley,

I would like to take the opportunity to voice my opposition to the proposed mining project led by Rise Gold Corp.

Ind 789-1 I am a Grass Valley native and have grave concerns about this proposal. I do not believe this is what our community wants. I'm concerned that the benefits of the project would not be for our local citizens.

I'm afraid the jobs created for locals would be minimum wage, manual labor positions while the higher paying salaries will go to a small, select group of outsiders brought in by Rise Gold Corp.

Ind 789-2 The environmental impacts of the project are extremely concerning. The EIR did nothing to satisfy my concerns. I believe it is in all of our mutual interests to make sure any mining operation in our area will be held to the absolute, most highest environmental standards possible. I do not feel like this is being done.

I am not impressed by the reputation and past business practices of Rise Gold Corp. I do not want my beloved home town left with the mess created by a foreign company with absolutely no invested interest, other than profit, in the well-being of our area.

Ind 789-3 I respectfully ask you to consider my concerns.

Thank you sincerely for your time.

Tiffany French
15421 Gary Way
Grass Valley, CA 95949

1

INDIVIDUAL LETTER 789: TIFFANY FRENCH

Response to Comment Ind 789-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please see Master Responses 1 and 2. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 789-2

The commenter states that the environmental impacts of the project are extremely concerning, but does not identify specific impacts of concern. Thus, no further response is required nor possible. Please see Master Response 1.

Response to Comment Ind 789-3

Please see Master Response 3 – Operator Responsibility.

Individual Letter 790
Dist 3
Tiffany Graves

THANK YOU FOR YOUR SERVICE TO OUR COMMUNITY. PLEASE

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS



I HAVE LIVED IN GV 30+ YEARS - MOST OF MY LIFE. MY PARENTS LIVE IN CHICAGO PARK, INLAWS ARE IN ALTA SIERRA. WE ARE ALL STRONGLY OPPOSED TO THE MINE. THE "ONLY" POSITIVE I HAVE HEARD IS - MORE REVNUE AND JOBS - YET EVERY BIZ HAS A HELP WANTED SIGN. THE MINE WILL ATTRACT MORE PEOPLE TO MOVE FROM OUT-OF-TOWN! THIS FEELS LIKE A DECISION BASED ON GREED AND IGNORING THE LOTS OF ENVIRONMENTAL CONCERNS. RISE HAS A HORRIBLE RECORD AND HAS FAILED TO SHOW RESPONSIBILITY - NO MINE!

TIFFANY GRAVES - GV RESIDENT

Ind 790-1

INDIVIDUAL LETTER 790: TIFFANY GRAVES

Response to Comment Ind 790-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project and concerns regarding the applicant. Please see Master Responses 1 and 3. The comment is noted for the record and has been forwarded to the decisionmakers for their consideration

Individual Letter 791

From: Tim Brennan
To: bdofsupervisors
Subject: Idaho-Maryland Mine
Date: Tuesday, March 22, 2022 4:41:12 PM

Dist 1

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Dear madams and sirs,

Please count me as opposed to the re-opening of the Idaho-Maryland Mine, at least as currently proposed.
I suggest that the draft environmental report falls short of accurately identifying the environmental, social, and economic impacts to the community and the mitigation measures proposed are inadequate.
I will not enumerate any specifics here now as the public discussion has been vigorous, detailed, and well published. Others have already spoken to the specific concerns. And, of course you have all been paying close attention,I am sure. Thank you for your public service; all your time, effort, and dedication for the benefit of Nevada County and its citizens.
If the volume of public comment I have seen is any indication, the population of Nevada County seems overwhelmingly opposed to approving the current proposal, even with such adjustments or conditions of approval as may be suggested.

Ind 791-1

By the way, I am a participating member of the Nevada County community; 35-year resident of District 1, property owner, small business owner, business & private tax payer. I shop locally for goods and services, and I vote every opportunity provided to me.

Thanks for listening,
Tim Brennan
530/265-8154

INDIVIDUAL LETTER 791: TIM BRENNAN

Response to Comment Ind 791-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Social and economic concerns are outside the scope of CEQA - please see Master Responses 1 and 2. Additionally, the commenter expresses a general opinion that the DEIR is inadequate, but does not provide specific examples that would allow for a detailed response. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 792

From: Tim Brown
To: Idaho MMEIR
Subject: Mine
Date: Friday, January 14, 2022 11:35:25 PM

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Ind 792-1

What is not mentioned in any report is the homes that will suffer from the opening of the mine with families on green horn road. I am such a family I have a home .5 milieus from the site, you mention Bennett st many times but no mention of the hundreds of homes on greenhorn with wells. The Eire report mentions only a portion of the property not the hole 175 acres. Also in his earlier statement rise gold mention of cancer causing politeness , but also said it is in small amounts, it is not his family that can die from partials in the air or the schools it blows towards. I am not pleased when the citizens of grass valley are placed in a position of being NOT Significant. Enough to count as the report reported , This will only cause damage and property value loss for the next 80 years if approved. Tim brown Grass valley
Sent from my iPad

INDIVIDUAL LETTER 792: TIM BROWN

Response to Comment Ind 792-1

Regarding well impact concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. Regarding cancer concerns, the DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 793

From: Tim Stokes
To: Idaho MMEIR
Subject: Objections to the re-opening of the Idaho-Maryland mine
Date: Saturday, March 12, 2022 8:49:52 PM

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Section 1.4 of the Draft EIR states:
"The utility and purpose of the Centennial Clean up Project is to ensure timely and efficient clean-up... " (of the site).

After discussing court rulings in similar instances of " Separation of Utilities",
the report concludes,
"Consequently, the Idaho-Maryland Project can proceed independently from the Centennial Clean-up Project, even if the Centennial Clean-up Project is not completed within the terms of the mining permit."

Ind 793-1 The proposed permit is for eighty years.Does Nevada County consider that "timely"? And if the Clean-up Project is not completed within that time frame, and the fill is placed at the Brunswick site,then there couldn't be a "full placement"...to the pad design elevations" at the Centennial site.
Consequently, there would have to be more truck traffic generated (with the attendant environmental impacts),both onsite and offsite that the EIR doesn't address.

I am opposed to the re-opening of the Idaho-Maryland mine.

Ind 793-2

Tim Stokes
127 Northridge Dr.
Grass Valley, CA 95945

INDIVIDUAL LETTER 793: TIM STOKES

Response to Comment Ind 793-1

Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 793-2

The commenter's opposition to the proposed project is noted for the record. Please see Master Response 1.

Individual Letter 794

From: Tina Hannon
To: bdofsupervisors
Cc: County Counsel
Subject: Rise Mine public hearing - accessibility
Date: Saturday, March 19, 2022 3:27:23 PM

Dist 2

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Ind 794-1

I am writing to request that the Public Hearing this Thursday, March 24, 2002 on the Rise Gold Mine project be closed captioned in real time, inside the Board Chambers , to provide accessibility and the opportunity for full participation by the hearing impaired (the opportunity to comment during the hearing's proceedings). This accessibility service can be provided by a certified shorthand reporter with realtime capabilities. Please include this request into the Board's file on the Rise Gold Mine project. Thank you.

Tina Hannon
16105 John Way
Grass Valley, CA. 95949

INDIVIDUAL LETTER 794: TINA HANNON

Response to Comment Ind 794-1

The comment does not address the adequacy of the DEIR. However, the commenter's suggestion has been noted for the record and forwarded to County staff.

Individual Letter 795

From: Todd Wulf
To: bdofsupervisors
Subject: Reopening of the Idaho Maryland Mine
Date: Friday, February 18, 2022 9:40:00 AM

Dist 3

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2/18/2022

TO: Nevada County Board of Supervisors

FR: Todd Wulf, Grass Valley property owner, 15033 Towle Lane, Grass Valley, 95945

RE: Reopening of the Idaho Maryland Mine

Ind 795-1

As a homeowner and long-time resident I am writing today with deep concern about what I consider to be Rise Gold/Grass Valley's efforts to minimize the effects their industrial mining operation will have on the quiet rural areas around the proposed mine and dump sites. Rise Gold/Grass Valley is emphasizing that mining will be done 500-1000 feet underground and that the blasting and crushing will be "unnoticeable and undetectable."

Even if this was true, which I do not believe and which is not what the evidence points to in other "modern" mining efforts, their willingness to downplay the underground operations and overlook the above ground impacts point to the company's underlying aim to promote their agenda above honestly considering the effect the mine will have on our community.

I am not well-educated in the particulars of the modern mining industry; however, it is easy to imagine the noise and dust that will be created by mechanisms aimed at getting the rock to the surface from 500-1000 ft. below. In addition, the line of large trucks idling while waiting to have the ore loaded and the sound of all that material landing in a truck bed, over and over for 16 hours a day sounds impactful.

Ind 795-2

Then, there is the transportation of it out onto Brunswick Road with a truck every 10 minutes or so gearing up and down to get out of the compound, at Greenhorn 4 way stop and while turning onto Whispering Pines. Not to mention the trucks passing back and forth up and down Bennett Road all day.

Ind 795-3

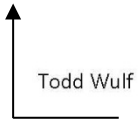
If that's not enough, the operation includes the sound of morning to night heavy equipment compacting, excavating, and grading fill piles up to 7 stories tall. That's 70 feet! That's higher than most buildings in our lovely county. Just the beep, beep, beep of the movers constantly backing up will be excruciating for miles around let alone the noise of the work being done.

Ind 795-4

The whole thing sounds like a noisy, intrusive, bad idea. It sounds incredibly impactful. I urge you not to dismiss or diminish the concerns of residents about the reopening of the Idaho Maryland Mine. We make up the county. We purchase goods and services, we participate in community life with work and volunteer activities, we pay taxes, and there are a great many of us who will be affected.

Please do not bring this disruptive proposition to our area in exchange for less than 300 new jobs and a relatively small amount of tax revenue that can likely be acquired in a way more conducive to the health and quality of life that we who live here cherish.

Respectfully,


Todd Wulf

INDIVIDUAL LETTER 795: TODD WULF

Response to Comment Ind 795-1

Air pollution and dust are addressed in Chapter 4.3 of the DEIR, and Noise is addressed in Chapter 4.10. Based on the project-specific noise analysis, which was independently reviewed by the County's third-party noise consultant, none of the individual activities associated with long-term operations of the proposed project would generate noise in excess of the applicable noise standards. Furthermore, combined project noise impacts are not anticipated for the proposed project. Nonetheless, because the project would include multiple processes which generate noise, and because compliance with the Nevada County Noise Standards is required, Mitigation Measure 4.10-2 of the DEIR requires ongoing implementation of a comprehensive noise monitoring program using noise monitors around the Brunswick and Centennial Industrial Sites. The monitoring program will be independently verified by a third-party consultant under direct contract with Nevada County. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors.

Response to Comment Ind 795-2

Please refer to Chapter 4.12, Transportation, of the DEIR for additional information related to truck traffic. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 795-3

Please see Response to Comment Ind 795-1. It is also noted that Mitigation Measures 4.10-1 and 4.10-2 prohibit use of conventional "beeper" devices on construction and haul vehicles.

Response to Comment Ind 795-4

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. Please refer to Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 796

From: Veronika Behlmer
To: bdofsupervisors
Subject: Don"t trust Ben Mossman or Rise Gold
Date: Wednesday, February 9, 2022 6:42:57 PM

Dist 3

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Dear Nevada County Supervisors

Re: Rise Gold behavior demonstrates they can't be trusted.

It causes me concern that Rise Gold and Mr. Mossman have shaded the truth, spun it or used selective information to attain their goals… and we are supposed to trust him? If he has shown less than honest behavior is it prudent to grant Rise an 80 year permit? Following are three examples:

Ind 796-1

1) The survey to residents in the county included the question: " If opening the mine protected you from wildfire, would you support opening the mine? What a loaded question! The mine would not have protected use from the Bennett, River or Idaho Maryland/ Brunswick fire this summer. How about asking the question would you be in favor of the mine if it decreased traffic safety from increased traffic, which it will, with our two lane roads with blind and semi blind turns; roads that would require drivers to cross traffic lanes without signal lights. There was a fatal head on accident on Brunswick last fall.

Ind 796-2

2) Looking at table 21 and 22 from the noise analysis performed by Bollard Acoustical, it said the criteria for noise will not be exceed for post construction operations. While it may be true noise may not exceed a decibel level, the background noise will increase. How can it not with 13,000 trips per month based data given on page 883 and 884 of the DEIR? No mention of this in the survey ! I can easily hear cars on Bennett with my double pane windows closed and my house is 700 feet off the road. What about the ore trucks running 14 hours per day seven days a week? Let's hope the employees of Rise do not commute on motorcycles.

Ind 796-3

3)When the DEIR came out this was a quote in the Union paper: " The results of the county's independent study and analysis of the project speak for themselves; there are no significant impacts to water quality, groundwater, air quality or the natural environment.

"Rise Grass Valley is proud of its state-of-the-art Idaho-Maryland Mine reopening project that will minimize air and greenhouse gas emissions and protect water quality while creating more than 600 good-paying jobs, increasing fire safety and boosting the Nevada County economy.

Six hundred jobs? How can that be when their documents refer to 300 jobs? Did the Union get this wrong? Even if 300 jobs, it is over stated. Are they going to hire 300 people without mine experience to operate the mine? They will have to bring in experienced people to manage and train new hires that will subtract from the jobs created for the local population. Increase fire safety? The above statements by Rise are such a distortion of the truth and conveniently omits negative aspects.

Ind 796-4

We know from Mossman's legal troubles in Canada that he should be handled with care. Observing statements and documents from Rise makes me trust them all the less. Please vote "no" on the mine. Their behavior demonstrates they can't be trusted.

Tom Behlmer
12448 Old Mine, Grass Valley
District 3

INDIVIDUAL LETTER 796: TOM BEHLMER (1)

Response to Comment Ind 796-1
The comment does not address the adequacy of the DEIR, but rather expresses general concern regarding the applicant. Please refer to Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 796-2
Tables 21 and 22 of the Noise and Vibration Analysis prepared for the proposed project present cumulative noise exposure, which includes background noise. With the consideration of background noise, noise levels would not exceed the applicable daytime and nighttime noise criteria at the studied sensitive receptors. Please refer to Chapter 4.10, Noise and Vibration, for addition information related to noise impacts.

Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 796-3
The comment does not address the adequacy of the DEIR, but rather expresses concerns about public statements made in regard to the proposed project. The commenter's concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Response to Comment Ind 796-4
Please see Master Response 3 – Operator Responsibility.

Individual Letter 797

From: Tom Behlmer
To: Idaho MMEIR
Subject: Comment on mine from Grass Valley resident
Date: Monday, January 10, 2022 9:36:00 PM
Attachments: Sherry Movers"s Photos (1).jpeg

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Matt Kelley, Senior Planner
Nevada County Planning Department

Ind 797-1 The Rise Gold mine will generate an additional 16,640 one way trips per month. Yet the company filings with the county consider the traffic increase as negligible. I would not consider that increased amount negligible. The resultant emissions, noise and safety hazards are not acceptable.

Ind 797-2 Roads leading to the mine (Bennett, Brunswick and Hwy 174) are two lane twisting roads with semi blind curves with perpendicular feeder roads all along the way that require merging cars to cross oncoming traffic. Increased traffic from the mine will raise the risk of fatal accidents. In the fall of 2021 there was a fatal head on accident at the top of Brunswick that sent two others to the hospital. It occurred under ideal driving conditions. A picture is above. I have nearly had a head on accident on Bennett taking my daughter to school when a car crossed into my lane. Luckily for all, he was able to pass me on my passenger side while using the shoulder as the third lane.

Ind 797-3 If approved, I feel like the residents within a half mile of the mine will be sacrificial lambs. We will suffer increased traffic safety risks, more noise, pollution, potentially de-watered wells and ultimately devalued property.

Lastly, an evacuation due to a fire will only make a safe evacuation more difficult.

Monthly traffic calculation from pages 883 and 884 of E.I.R.:

Ind 797-4
44 x 20 days, employees working five days a week
134 x 30 days, half of the seven day off, seven day on work force
57 x 30 days, ore truck and ancillary trips with potentially twice this amount during peak periods.

6610 x 2 for the second leg going outbound =13,220 trips in or out per month. Again this could be higher during peak periods.

Tom Behlmer
12448 Old Mine Rd
Grass Valley CA 95945
(530) 272-3147

INDIVIDUAL LETTER 797: TOM BEHLMER (2)

Response to Comment Ind 797-1

The comment expresses a general opinion that the project-generated traffic should not be considered negligible, but does not provide specific examples that would allow for a detailed response. Contrary to the commenter's statements, the DEIR does not conclude that all potential environmental impacts that would occur from traffic generated by the proposed project would be less than significant, or negligible, to use the commenter's term. In fact, as summarized in Table 2-1 of the DEIR, which begins on page 2-10, the DEIR identifies significant impacts with respect to air quality, noise, and transportation and requires mitigation measures to reduce the severity level of such impacts to the extent feasible.

Please see Master Response 1.

Response to Comment Ind 797-2

Potentially hazardous road conditions associated with the proposed project are evaluated in the DEIR under Impact 4.12-6, which starts on page 4.12-83. As detailed therein, due to the nature of the project, a number of potential issues related to roadway design features and incompatible uses could occur as a result of implementation of the proposed project, including the adequacy of pavement conditions for truck traffic, routes to handle truck turning movements, sight distance along proposed haul routes, and acceleration of trucks on grade. The DEIR concludes that proposed project would result in a significant impact, as short-term construction traffic and potential street closures could interfere with existing roadway operations during the construction phase; the additional project truck traffic would result in a shorter lifespan of the pavement or increased maintenance at a number of study roadway segments; and pavement improvements would be required at the E. Bennett Road/Millsite Road intersection to ensure adequate truck turning movements. However, the DEIR requires various provisions to address such impacts through Mitigation Measures 4.12-6(a) through 4.12-6(f). Through implementation of the aforementioned mitigation, impacts would be reduced to less than significant.

Response to Comment Ind 797-3

The comment does not directly address the adequacy of the DEIR. The comment asserts that approval of the proposed project would result in impacts to residents within 0.5-mile of the project site related to traffic safety, noise, pollution, wells, and property values, but does not provide specific examples that would allow for a detailed response. Please see Master Responses 1, 2, and 15 – Adequacy of Groundwater Monitoring Wells. For traffic safety risks, please see Response to Comment Ind 797-2. For noise concerns, please see Response to Comment Ind 795-1. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Response to Comment Ind 797-4

Please see Master Response 5 – Evacuation Zones and Master Response 6 – Wildfire Impacts. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

From: Tom Behlmer <gogettom@hotmail.com>
Sent: Monday, January 10, 2022 9:36 PM
To: Idaho MMEIR
Subject: Comment on mine from Grass Valley resident
Attachments: Sherry Moyers's Photos (1).jpeg

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Matt Kelley, Senior Planner
Nevada County Planning Department

The Rise Gold mine will generate an additional 16,640 one way trips per month. Yet the company filings with the county consider the traffic increase as negligible. I would not consider that increased amount negligible. The resultant emissions, noise and safety hazards are not acceptable.

Roads leading to the mine (Bennett, Brunswick and Hwy 174) are two lane twisting roads with semi blind curves with perpendicular feeder roads all along the way that require merging cars to cross oncoming traffic. Increased traffic from the mine will raise the risk of fatal accidents. In the fall of 2021 there was a fatal head on accident at the top of Brunswick that sent two others to the hospital. It occurred under ideal driving conditions. A picture is above. I have nearly had a head on accident on Bennett taking my daughter to school when a car crossed into my lane. Luckily for all, he was able to pass me on my passenger side while using the shoulder as the third lane.

If approved, I feel like the residents within a half mile of the mine will be sacrificial lambs. We will suffer increased traffic safety risks, more noise, pollution, potentially de-watered wells and ultimately devalued property.

Ind 798-1

Lastly, an evacuation due to a fire will only make a safe evacuation more difficult.

Monthly traffic calculation from pages 883 and 884 of E.I.R.:

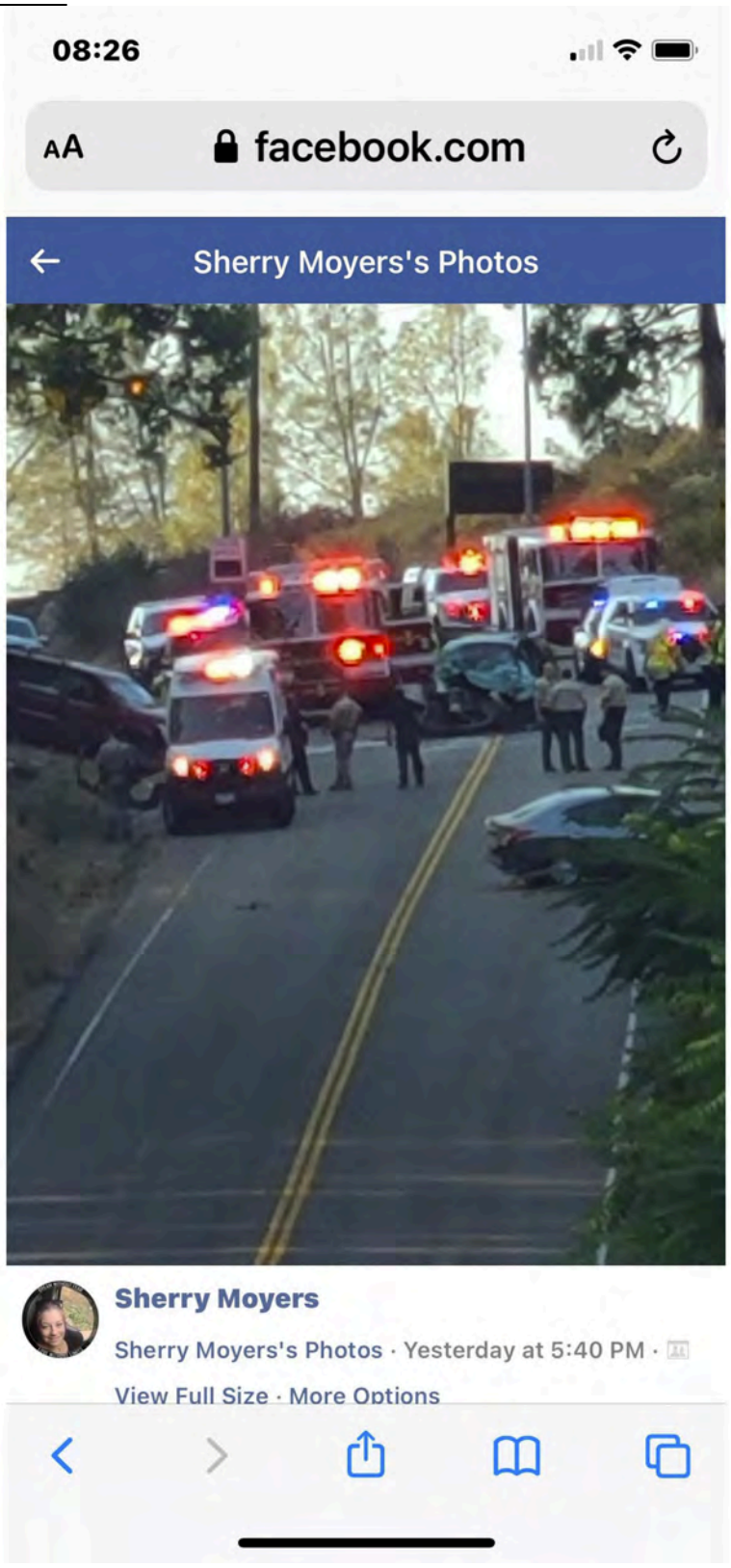
44 x 20 days, employees working five days a week
134 x 30 days, half of the seven day off, seven day on work force
57 x 30 days, ore truck and ancillary trips with potentially twice this amount during peak periods.

6610 x 2 for the second leg going outbound =13,220 trips in or out per month. Again this could be higher during peak periods.

Tom Behlmer
12448 Old Mine Rd
Grass Valley CA 95945
(530) 272-3147

1

Ind 798-2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INDIVIDUAL LETTER 798: TOM BEHLMER (3)

Response to Comment Ind 798-1

This letter is a duplicate copy of Individual Letter 797. Please see comments and responses in Individual Letter 797.

Individual Letter 799

From: Veronika Behlmer
To: Idaho MMEIR
Subject: No mitigation plan for employee commute traffic or ore trucks aside from not using brakes.
Date: Friday, January 28, 2022 12:01:32 PM

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Dear Matt Kelley, Senior Planner
Nevada County Planning Department

After reviewing the D.E.I.R. and the number of trips generated, I did not see mitigation measure plans about noise from the increased traffic generated by the mine. There are noise mitigation measures for the actual operation of the mine, but it appears not for traffic generated by the mine as long as it does not breach a certain decibel level. What concerns me is not the surpassing of a decibel level, but instead the increased din of traffic. The amount of one way trips generated per month will be in excess of 13,000 using information found on page 883 of the D.E.I.R.

In the traffic analysis document filed with the county, it was deemed that the increased noise would not be deemed "significant" and no mitigation was required. While true that a decibel level may not be surpassed, the background noise would be more prevalent. Would you want an additional 13,000 trips per month in your neighborhood? Would it add to the ambient noise level?

Ind 799-1

Because most of the houses around the mine sit above it, the noise will travel. I live 800 feet off and above Bennett Road and have to keep my bedroom window closed or else be woken up by morning commute traffic. I can only imagine what the noise will be like if the mine opens.

The 13,200 one way trips would equate to an average of an additional car trip of one every two minutes in the vicinity of the mine.

13,200 / 30 days = 440 per day divided by 12 hours per day = 36 per hour or a car every two minutes. Of course not all traffic will be confined to one road. Assuming it is split evenly between going west Brunswick, east on Brunswick to Hwy 174 and Bennett to Hwy 49, it would be a car or truck passing on average every five to six minutes seven days a week 12 hours per day. Plus there is the issue of added exhaust from the traffic.

Tom Behlmer
12448 Old Mine
Grass Valley CA 95945

INDIVIDUAL LETTER 799: TOM BEHLMER (4)

Response to Comment Ind 799-1

With respect to potential traffic-related noise impacts that could occur as a result of the proposed project, the DEIR evaluates such impacts under Impact 4.10-2, which starts on page 4.10-31, as well as under Impact 4.10-3, which starts on page 4.10-37. With respect to off-site traffic during the first five years of the project, when fill would be transported from the Brunswick Industrial Site to the Centennial Industrial Site, the DEIR concludes that the traffic noise level increases from the transport of fill from the Brunswick Industrial Site to the Centennial Industrial Site and employee trips would not exceed the applicable County thresholds of significance at any of the nearest residential receptors. However, because the use of jake brakes could result in a substantial increase in ambient noise levels, the DEIR includes Mitigation Measure 4.10-2, which mandates that haul truck operators operate their trucks in such a manner so as to not require the use of jake brakes along the project haul routes.

With respect to potential long-term off-site traffic noise impacts, the traffic noise level increase from the transport of fill from the Brunswick Industrial Site to the highway and from employee commutes would not exceed the applicable County thresholds of significance at any of the receptors. Therefore, noise-related impacts from off-site heavy truck and employee traffic are found to be less than significant under Impact 4.10-3. CEQA requires use of thresholds of significance when determining impact significance, as has been done in the project noise analysis.

Please see Master Response 1 and the discussions and analyses in Chapter 4.10, Noise and Vibration, of the DEIR. The comment has been noted for the record and forwarded to the decisionmakers as part of their consideration of the proposed project.

Individual Letter 800

From: Tom Bremser <tom.bremser@gmail.com>
Sent: Tuesday, March 22, 2022 10:40 AM
To: Idaho MMEIR
Subject: Objection to the proposal to reopen the Idaho Maryland Mine

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Ind 800-1

As Nevada County residents and property owners, we strongly object to the proposal by Rise Gold to reopen the Idaho Maryland Mine.
We own property and reside on Idaho Maryland Rd, just north of the east end of the Nevada County Airport runway. Maps of the existing mine shafts indicate that historical shafts lie under my property. The driving route into downtown Grass Valley is either Brunswick to Whispering Pine or Brunswick to Bennett. With our property's proximity to the mine site and the proposed use of the Centennial site as a waste disposal site, the reopened operation will have a significant impact on our daily lives. Not only are we concerned about the lowering of the value of our property, we also are concerned about the negative effect the mine operation will have on our air quality, the effect of the required detonations, the added noise, traffic and a refuse site within the Grass Valley city limits.
This is no longer the 1850s nor even the 1950s. This proposal is 70 years past its expiration date. A residential community has grown up around the mining operation site and the land use has changed. This area should not be the location of this type of heavy industry.
The hubris of a group of outsiders, who are from outside not only our community, but our county, state and country, is beyond belief. With only the hope of their own financial reward and seeming disregard of our community, Rise Gold is offering a minimum to Nevada County in return. This idea is bad for Grass Valley and all of Nevada County, and we do not think that Nevada County should approve the proposal.

Thomas Bremser and Debra Humm-Bremser
13180 Idaho Maryland Rd
Nevada City

INDIVIDUAL LETTER 800: THOMAS BRESMER AND DEBRA HUMM-BRESMER

Response to Comment Ind 800-1

The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. Property value concerns are outside the scope of CEQA – please see Master Response 1. Regarding air quality concerns, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Climate Change. Regarding noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 795-1. Regarding generally noted traffic concerns, please see Chapter 4.12, Transportation.

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decision-makers for their consideration.

The Customer Point of View

Re: Comments to the DEIR for the Idaho Maryland Mine

Hello,

The following areas are two areas where I believe further information must be supplied to further validate the eventual EIR to be a comprehensive document.

Ind 801-1

1. In section 4.9-5 there is a chart that is the source of assumptions in the DEIR. The chart is housing units and vacancy rates. Knowing Nevada County, and even seeing the data, it should not be presumed that the entire county is part of the sphere of housing for Applicant employees. In fact the entire Truckee data, a whopping 51% vacancy rate and over half of total vacant units is most certainly different than the far more local and applicable 8% vacancy rates seen in Grass Valley and Nevada City. Looking more closely then at the increases on traffic and other services may turn out very differently if looked at from a geographic point of view. Parsing to identify the reality of how humans are currently (in 2022, not 2018 data) dispersed would be far more informative to everyone.

Ind 801-2

2. As best as I can tell, overall identification and mitigation for Carbon Footprint/Climate Change is entirely missing from this document. Based on my reading of CEQA Guidelines (https://opr.ca.gov/ceqa/ceqa-climate-change.html) requires consideration. Since this appears to be omitted, the DEIR will need to be resubmitted to the public after revision. It is unreasonable to accept whatever data is used in a section of this nature and should be reviewed from many perspectives prior to a final consideration by the Planning Commission.

The County has undergone tremendous transformation since this mine was closed in 1956. The data I have found shows entire county population in 1950 at 19,888 and in 1960 20,911. From that, we can infer that the closure of the mine in 1956 was the beginning of the beginning of when the county population went through a boom cycle, NOT driven by mining. The population is currently 98,790 a FIVE FOLD increase after mining LEFT. During that time, the county also attracted other types of industrial and commercial businesses and industries, having come and gone, some with greater legacies than others.

Ind 801-3

Over the period from 1960 to present day, all of the real estate adjacent to the Applicant's site has been purchased on the open market, built and populated with residential housing that aligns with the above population boom. The nearest commercial uses are at the Nevada County Airport. Unfortunately, the County has not revisited the reality of those changes of the "neighborhood" around the Idaho-Maryland Mine site now encircled by homeowners.

As the mine was closing, the winds of change were already swirling. In 1955 Brunswick Road was expanded, which created the opportunity to turn the Glennbrook basin into the retail and food uses it now holds. Additionally, to put a further exclamation point on the transformation of Nevada County, the freeway between Grass Valley and Nevada City was built in the 1960s, further creating two cities with suburbs and putting added pressure on the historic mining uses. Collectively, these businesses create millions of dollars of direct revenue through taxes to Grass Valley and Nevada County, which the mine will not.

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Ind 801-4

Not considering the changing landscape of usage over these decades has created a donut for the Idaho-Maryland Mine that puts at risk the life and values that all of the new (relative to 1956) residents enjoy today, day in and day out. Hence the deep concerns over air, water, noise, traffic, etc., are a logical concern for this community.

Ind 801-5

Addressing the two topics referenced above is one of the many more scientific and data driven fragilities of this DEIR. The DEIR does not weigh the risks of the mitigations, nor the financial ability of the applicant to provide these indefinitely. One needs look no further than the Lava Cap gold mine, it's closure and eventual challenges for cleanups (albeit not part of the Applicant's process) that the owners did not have the capital reserves to administer years after closure. A 10-year-long lawsuit finally put a price on the effort, which may not necessarily be payable by the owner's own assets. What do you do when the owner simply closes the door and leaves?

The risks therefore, are important to consider in the DEIR. It may not be "required", but, it should be requested to be included wherever possible. And backups to those risks, "then what" need to be addressed in advance. A corporation's business motivation is to operate at the lowest possible costs, creating incentives to reduce costs indefinitely. That is not the general homeowners perspective on their home and therein lies an immediate and indefinite conflict. When the City or County fails to meet the needs, there is a democratic process in place as well as many, many ways to seek conflict resolution. A corporation falls outside of all of those and can move forward meeting whatever it does as the minimum cost standard that achieves the promised mitigation....as long as the money lasts.

Ind 801-6

With the plan and DEIR missing Greenhouse gas emissions conversation entirely, and using data from Truckee to guide thinking about housing in GV and NC, it does not look at the future realistically. It can anticipate trucks driven without drivers (reducing headcount). It can expect power outages (creating the need for onsite electrical power requirements), it can look at the carbon footprint (being a creator of significant carbon emissions, I suspect) and the Planning Commission and the Community can now require that these subjects be addressed for open conversation.

Ind 801-7

The Environmental Impact Statement is intended to look into the future. With an 80 year commitment and promises to all those neighbors and the entire community, it's incumbent upon the Planning Commission to hold the Applicant accountable into the future, under foreseeable future outlooks for what it presents today.

Thank you for your consideration.

Respectfully,

Tom

Tom Larsen

TomLarsen@alum.berkeley.edu
B.S. Conservation of Natural Resources, focus Environmental Impact Statements, UC Berkeley
Current resident, former and current business owner and property owner in Nevada County,

INDIVIDUAL LETTER 801: TOM LARSEN

Response to Comment Ind 801-1
Comment noted. The data presented in Table 4.9-5 of the DEIR is from the adopted Nevada County Housing Element Update. As noted on page 4.9-9, the overall housing vacancy rate in Nevada County, including incorporated areas is at 22.5 percent, which is an increase of approximately 6.6 percent over 2010 levels. Each jurisdiction in the County has seen a similar increase in the overall number of vacant units within their jurisdiction with the unincorporated area going from 12.3 percent in 2010 to 14.4 percent in 2018.

Response to Comment Ind 801-2
The commenter is incorrect. Impacts related to carbon emissions and contribution to global climate change are evaluated in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, specifically under Impacts 4.3-7 and 4.3-8.

Response to Comment Ind 801-3
The comment provides a brief history of growth in Nevada County, but does not address the adequacy of the DEIR. Potential adverse physical environmental impacts of the proposed mine on the surrounding community are addressed throughout the technical chapters of the DEIR.

Response to Comment Ind 801-4
The comment does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project that do not enable a more specific response. For concerns related to air, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy. For concerns related to noise, please see Chapter 4.10, Noise and Vibration. For concerns related to traffic, please see Chapter 4.12, Transportation. For water concerns, please see Chapter 4.8, Hydrology and Water Quality, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 801-5
Please see Master Response 3. Additionally, pursuant to Section 15145 of the CEQA Guidelines, CEQA does not require evaluation of speculative impacts.

Response to Comment Ind 801-6
Please refer to Responses to Comments Ind 801-1 and Ind 801-2.

Response to Comment Ind 801-7
The comment does not address the adequacy of the DEIR, but rather expresses general concerns about the proposed project. The commenter's concerns are noted for the record and have been forwarded to the decisionmakers for their consideration.

Individual Letter 802

From: Tom Martin <topamar@gmail.com>
Sent: Wednesday, March 30, 2022 11:15 AM
To: Heidi Hall; Idaho MMEIR
Subject: Idaho-Maryland Mine EIR

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Ind 802-1

I have done my best to review the Environmental Impact Report for the proposed mining project. Despite having training and 35 years of experience in civil engineering and planning, and having prepared environmental documents myself, I found the report to be lacking in clear nexuses between identified impacts and proposed mitigations. This, together with the applicant's history of ignoring mitigations and remediations on previous projects, leads me to conclude that the only way to protect Nevada County and its citizens is to require an adequate Performance Bond to insure that all requirements, mitigations and remediations are actually done. Because of the broad scope of work, the range of potential impacts, the 80 year term of the permit and the unforeseen costs of future cleanup, the amount of the Performance Bond should be in the $50 million to $100 million range. An adequate Performance Bond is the only guarantee that Nevada County can be made whole again after this massive extraction process. The bond needs to be accessible to the County during the work and after the applicant has vacated the project site. In other words, if the project is granted the 80 year permit, the bond needs to be in place for 100 years.

Thank you for the opportunity to comment on the report,
Tom Martin
12666 Pasquale Rd, Nevada City, CA 95959

INDIVIDUAL LETTER 802: TOM MARTIN

Response to Comment Ind 802-1

The comment asserts that the DEIR is lacking in clear nexuses between identified impacts and proposed mitigations but does not provide any specific evidence to substantiate this claim. The project requires an approved Reclamation Plan. To ensure that reclamation will proceed in accordance with the approved Reclamation Plan, the County shall require as a condition of approval Security that will be released upon satisfactory performance. The applicant may pose Security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the surface mining operation's approved Plan. (DEIR, p. 4.6-24; Appendix C.)

The commenter's suggestion has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 803

Dist 4

DO NOT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind
803-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) TOM & GLORIA MEYERS
Address PO Box 649, North San Juan ZIP 95960
Phone 530 470 0862
Email Address tomglomeyers@earthlink.net
WE OPPOSE OPENING THE MINE.

INDIVIDUAL LETTER 803: TOM AND GLORIA MEYERS

Response to Comment Ind 803-1

The commenter does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment is noted for the record and has been forwarded to the decision-makers for their consideration.

Individual Letter 804

From: Tony Lauria <topotony@gmail.com>
Sent: Sunday, April 3, 2022 1:18 PM
To: Idaho MMEIR
Subject: IMM DEIR Public Comment - April 3, 2022

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Duplicate Comment Submission from alternate email address, to make sure original submission does not get forwarded to junk mail.

Idaho Maryland Mine DEIR comment - April 3rd, 2022
Submitted by:
Tony & Lauren Lauria
13784 Greenhorn Rd
Grass Valley, CA. 95945
530-913-6106

Ind 804-1 The DEIR is woefully deficient regarding the multitude of impacts that are not represented as the serious life changing threats they are. Nor are they properly deemed impacts that cannot be mitigated to less than significant to the health, welfare and well being of the thousands of residents residing within the boundaries of mine operations. Additionally, there are many impacts and considerations not mentioned at all in the DEIR. Please address the following. My obvious conclusion is to recommend No Project No Build.

WATER:
There is no mention of drought in the DEIR. We are experiencing the driest times in 1200 years, according to scientists.
This should be a priority issue. We need our ground water, and cannot afford the massive dewatering that is proposed. Prime example of the drought is how trees snapped during the December 2021 snow storm. So little moisture in the trees precipitated brittle conditions, that caused so many to snap under snow loads that should not have been too excessive for trees that have normal water content within.

Ind 804-2 Hydrological studies are proven to be inaccurate in determining how dewatering and mining operations will affect wells. There is no mention in the DEIR as to the potential impacts to all wells within the mineral rights boundaries. There is no mention of any other area of potential well impact, aside from the 30 proposed NID service water replacement properties directly next to the IMM mine site on Bennett St. This is a major flaw in the DEIR. There are over 500 wells within 1/2 mile of the site. Those and many more are at risk of draining and/or contamination damage. There is no definition mentioned in the DEIR as to the potential area of impact to wells, which should be the entire mineral rights boundaries.

Ind 804-3 For a proposed 80 year project, there is no guarantee the mining will be restricted to areas in the immediate vicinity of the IMM site, and thus no guarantee impacts will be confined to the immediate vicinity of the mine site. A comprehensive monitoring of each well, within the mineral boundary rights,

must be put in place before any permit is granted. As stated by professionals, such as Peters Well Drilling, any given well could be recharging from an underground fissure miles away. That is how gravity works. The DEIR must include the requirement that every well within the mineral rights be monitored for a minimum of 3 years to establish baselines of data. Sophisticated daily monitoring systems must be installed, and professional services hired to evaluate the data. This data must include, not only volume and flow, but quality tests for excessive minerals, chemicals and contaminates. Additionally, a well thought out plan of action must be created for reporting changes or failures of a well, when dewatering operations begin. An agency must be established as primary contact for this reporting, and immediate water replacement services engaged.

Ind 804-4 NID infrastructure must be in place before any dewatering and/or mining operations begin. For the vast majority of well owners, there is no option for NID service because it is physically not available. Many miles of pipelines must be installed and made ready for immediate service should a well be damaged or drained. This must be constructed for all wells within the mineral rights boundaries. Additionally, the NID service must be equal to the well volume currently available at each well. Not the proposed smaller 5/8" service pipe Rise is intending to install for the 30 Bennett St residents. These are the details that the DEIR fails to include. It allows Rise to avoid what is right and fair.

Ind 804-5 All associated costs for well monitoring, NID infrastructure and monthly service charges must be the responsibility of Rise Gold. This must be a permanent responsibility. Well owners are not asking for this mine and the risk to their wells. Any and all costs related to infrastructure, installation to homes, and ongoing service fees for NID water, must be paid for by Rise, and continue permanently. Those payments must not end with the sale of property, or any annexing to the city process. Again, this cannot be a gift to Rise by the residents. Our population is not asking for this mine project and does not want to support it. The DEIR must show that it is not acceptable to proceed with the risk to well damages until NID infrastructure is in place. Should wells be drained or damaged, there must be immediate replacement available and ready to turn on. A family home cannot sustain life without a clean water source. The DEIR must show this as fact.

Ind 804-6 A massive bond, in excess of many millions, must be posted by Rise Gold for contamination damage that could result in severe toxicity related heath incidents. We have seen how some residents of the Siskon mine disaster have suffered severe problems from the heavy metals which filled their domestic wells after the mining failure. This bond should be shown to cover potential damage to residential home foundations that are at risk due to vibrations of blasting below. All homes within the blast zones must be inspected prior to operations, to determine their integrity, should a problem arise. Again, all paid for by Rise Gold. A plan for claiming damage must also be in place, whereby a homeowner can contact an official and start their claim process.

Ind 804-7 Additionally, massive water use is projected for ongoing mine operations. This is unacceptable usage in a drought, and a burden on the priority residential use for our population.

Ind 804-8 Backflow of contamination into existing wells. First point to make is that any draw down by mine operations or dewatering may be significant in the current drought conditions. Losing only 10% of volume may reflect a compromise in isolation of the well. Every home water source must follow building codes to install back flow prevention valves. This is to prevent contamination from entering the water source.

Ind 804-9 These concerns are not speculative. Serious risks are present for all the wells within the mineral rights boundaries, and could extend outside of those boundaries. This must not be taken lightly. The DEIR must include these concerns and include the potential for severe impacts to all wells.

Ind 804-10 AIR:
The DEIR is extremely deficient in stating the severity of air pollution that will be generated from the mine. In the surrounding residential area, the community will be impacted by the massive reduction of air quality.

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There is insufficient data within the DEIR regarding the presence of asbestos in the serpentine rock that is prevalent underground. Asbestos will be released from this rock and be dispersed into the atmosphere, along with silica dust. Both are less than a micron in size, per particle, and cannot be controlled by watering the area. This is entirely impossible to mitigate to less than significant.

Ind 804-11

Exhaust from thousands of diesel truck trips weekly, and heavy equipment operation, can only be mitigated to less than significant by substituting electric vehicles. The technology does not exist, so, we're going to call this another impact that cannot be mitigated.

TRAFFIC:

Ind 804-12

Sufficient studies have no been done to simulate the congested impact of increased traffic on Brunswick Rd. HWY 174 and Bennett St. Additionally, not mentioned in the DEIR, is the increased traffic for the comings and goings of 600 workers to the site. 100 heavy truck loads per day, plus that many, and more of workers and deliveries of supplies, etc, will create a nightmare situation for these thoroughfares that are constantly used by residential traffic, as well as all manner of other traffic for commuters, deliveries and emergency vehicles.

Ind 804-13

There is not a complete evaluation of the extreme congestion and fire danger posed by this project. Greenhorn Rd has 1 path to evacuation. 600 mine workers attempting to evacuate during a wildfire is, again, a nightmare scenario.

WILDFIRE:

The DEIR states, in absolute absurdity, they are not causing any increase of fire danger. Massive amounts of high explosives and thousands of gallons of fuel, on site is the obvious indicator that they are presenting an increased fire danger for the area, 10 fold. This must be re-evaluated to provide a realistic statement of impact, that is Not able to be mitigated to less than significant.

Ind 804-14

The Nevada County airport is the hub of firefighting. It should not be impeded by any operations that restrict the flow of pilots or supporting gear to their facility on Loma Rica.

Fire trucks and personal, during fire season, must not encounter any impeded traffic that would delay their response to an emergency. The 236 daily truck and vehicle trips, generated by the mine operations, will most definitely impede successful operations by Cal Fire and all local and state fire services. This must be called out in the DEIR.

REZONING:

Ind 804-15

The DEIR has not mentioned the impact of rezoning the area to accommodate heavy industrial mining operations surrounded by a residential area. It mentions a sparsely populated residential area, which is completely wrong. Since 1956, when the mine was last in operation, thousands of people have moved to this area. No one bought their homes here with the disclosure that future drilling and blasting could be happening underground 24/7/365. No one was told the light industrially zoned former mine site could be rezoned to accommodate the heavy industry of mining. No one dreamed that an industry of environmental destructive exploitation would be considered, worth the risk, a century later. These are impacts that cannot be mitigated to anywhere near, less-than-significant.

The DEIR must evaluate the zoning issue regarding drilling and blasting underneath residentially zoned areas beneath homes. 70 years ago, when no homes existed within the mineral rights area, this was not an issue. But now, hundreds of homes have been built, and are occupied over the mineral rights boundaries. For example, if a plan was proposed to mine gold within 10 feet of the surface at any of these residential homes, a re-zoning would be necessary to do so. There should be the same requirements for mining 75' below the home. That requirement could not be accomplished without changing these residential areas to industrial, which cannot happen. A residentially zoned area, with occupied homes cannot be rezoned to industrial. This fact alone, should be grounds for No Project No Build.

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HIGH EXPLOSIVES:

No mention in the DEIR of the severe risk hauling such high explosives thru residential areas, including school zones, then storing such high explosives on the site. The use of high explosives is a severe impact and danger to the health and well being of the residential community, over which, these explosives will be detonated. Sinkholes, home foundation damage, internal home damage to walls and plaster, are just a few of the problems. The DEIR must show this is not an issue that can be mitigated to less than significant.

Ind 804-16

VIBRATION AND NOISE:

Completely inaccurate measurements are found in the DEIR. This area is quiet now, with noise from Brunswick only. There is no possibility this mining operation will not cause unbearable increases to everyone within miles of the site. We live 1 mile down Greenhorn Rd, and can hear the fairgrounds activity. Just think of the impact of hundreds of trucks, tractors and heavy equipment operating 24/7. Again, in a residential area, this is madness.

Ind 804-17

The vibration has not been addressed properly in the DEIR. The company creating the report for the DEIR did not come to my neighborhood and assess any conditions with regards to vibration. Drilling and blasting below my house will most definitely cause foundation problems and quality of life issues that cannot be mitigated at all. Imagine yourself and family living above such operations.

The DEIR must evaluate and examine the potential impact of mining operations vibration on businesses, out to, and beyond the mineral rights boundaries. Vibration under the dental and vision offices in Brunswick East, would impact physician's ability to perform the necessary delicate procedures involved in their medical practices. Accurate estimations and data must be reported with this concern. The same is true for Sierra Nevada Hospital.

Ind 804-18

Vibration must be considered a major impact for the new housing development on Brunswick and Idaho Maryland Rd. The same concerns for foundation integrity must be listed as a significant impact. The DEIR should reflect the potential for impact here, and with any other new building project proposed for the next 80 years.

The DEIR must require noise decibel rating testing on a massive scale. Our home is 1 mile down Greenhorn Rd. We were able to hear the construction of the ZAP Manufacturing building off Loma Rica near the airport. The sound was invasive and constant with noise of heavy machinery, including the inseccent back up beeping sounds of trucks. This is a "real life" result of noise pollution over distance. The proposed 24/7 noise from the mining operations would be far worse. The DEIR must show this is an issue that cannot be mitigated. Rise cannot stop their machinery and operations from causing unbearable noise for the residential population that exists in every direction around the site.

Ind 804-19

EXTENUATING CIRCUMSTANCES:

Wells are owned by private individuals and must be protected against damage or destruction, from above or below. Well owners have rights. It is not acceptable for a mining company to risk damage or destruction of wells, they do not own. Dewatering, drilling and blasting below residential homes has a direct impact to homeowners and their wells. The risk is not speculative. Again, the Siskon mine disaster reminds us of this. The DEIR must evaluate this impact and state the potential for an illegal damage and/or destruction of wells, due to their drilling and heavy explosives. Our wells must not be allowed to be tampered with by these proposed mining operations. This would be a breach of legal rights and lawful protection of property, if Rise is allowed to risk damage, draining or contamination to our wells. The DEIR should make this fully transparent and state there is no mitigation possible, since it is impossible to predict how the hydrology will react to these operations beneath my home.

Ind 804-20

The devaluation of property due to well loss or damage is inextricably connected to environmental loss and should be reflected as such in the DEIR. Any loss or damage to wells is an environmental impact that affects the value of property owners, and cannot be separated when considering the resulting impact.

WILDLIFE IMPACTS:

Ind 804-21

Very little has been mentioned about the impacts to wildlife. The DEIR has avoided the obvious, and that is, a major disruption to all wildlife in the area. This must be studied in depth and endangered species identified, as well as an accurate accounting of all wildlife in the area. Not just on site, but in all directions moving away from the site. Vibrations alone will cause wildlife to flee. Excessive noise will drive species away. The quiet evenings when owls communicate with each other, will be disrupted by the 24/7 noise. The increased flow in Wolf Creek will scour the banks and remove all forms of invertebrates, bacteria and all other lifeforms that thrive. That disruption will ripple out to the animals that depend on the creeks natural stability to survive. The chemical changes in the creek water will cause a massive die off, and/or the escape of wildlife to other areas. The DEIR does not even touch on this reality.
Here is proof of the thriving wildlife population in the area:
http://www.youtube.com/watch?v=1c4b9hrLI4s

NISENAN INDIGINOUS:

Ind 804-22

No mention in DEIR of the Nisenan people and their claims of sacred lands, and the environmental repercussions resulting in the potential impacts. This must be studied and analyzed, and reported in full.

ENGINEERED FILL CEMENT, BACKFILL INTO MINE SHAFTS:

Ind 804-23

There is no mention in the DEIR of the fact that heavy metals leach from concrete, and it's continuing impact for years to come, based on the massive amounts of the intended pumping of this mixture back into the tunnels. There is also no mention of the deadly hexavalent chromium that may be used in this mixture, nor any other list of additives that can be harmful to the ecosystem. Additionally, ground water will become contaminated, over time, by these chemicals and leaching. Eventually, wells will exhibit these in residential use for domestic purposes. This is not able to be mitigated to less than significant.

CONTRIBUTION TO CLIMATE CHANGE:

Ind 804-24

No mention of the overall contribution to climate change is discussed in the DEIR. At a time when our climate is rapidly changing due to increased carbon in the atmosphere, the DEIR should call out the specific impacts that will contribute immensely to the demise of the planet and our environment. The use of energy projected by this project is astounding, and goes against any county plan for controlling and reducing energy consumption.

SEISMiC FAULT:

Ind 804-25

The DEIR does not mention the fact that there is a fault running under the site. There must be studies to identify it's location and potential impact on the community if it should be affected by blasting and drilling above and below it. There are many documented incidents of failures involving high explosives used in mining on and within a seismic fault.

LAW ENFORCEMENT INCREASED NEEDS:

Ind 804-26

Many workers will come from outside our county. It is a fact that there will be a necessity for increased law enforcement to protect the population from the high number of transient workers that will be entering our community to work at the mine. This must be studies and evaluated. A budget must be considered for more law enforcement.

constant vibration from 24/7 drilling and blasting, draining and damage to wells that provide the only source of clean water to hundreds of homes. These are not speculative statements. Expert hydrologists will corroborate there is no way to guarantee dewatering will not draw from miles around, draining the cracks and fissures that feed these wells. The recent Siskon mine failure further stands as the reality of what can happen during deep bedrock mining under residential areas.

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AESTHETICS:
The DEIR does not call out the fact that heavy industrial trucks, tractors and mining equipment are an eyesore and very negative with regards to the aesthetics of the project.

Ind 804-27
The DEIR must include the obtrusive visual component of 90 foot tall piles of tailings. This is of high detriment to the aesthetics of the area. Toxic tailings, piles 90 feet high are taller than many tress. This is an obvious eyesore and must be stated as such in the DEIR.

If there is a chance lives will be ruined, the environment damaged for thousands of years, no company should no be permitted to take that risk in the name of monetary profit.

COMPLIANCE MONITORING:
Ind 804-28
The DEIR does not provide a verifiable plan for monitoring the numerous mitigations and standards compliance. We cannot depend on the Rise company to self monitor. The CEO is under litigation for prior environmental damage due to toxic spills. 35 charges to be exact. There is no guarantee he will follow the rules this time, and the consequences are staggering, given the location amidst a surrounding residential area with thousands of inhabitants. The DEIR must offer a plan and independent service to conduct routine inspections for all aspects of the project.

COMPETENCY OF APPLICANT
Ind 804-29
The DEIR should review the abilities of the applicant to be competent and fully funded for the project. The environmental impact could be multiplied should the applicant fail to have the knowledge and ability to carry out the proper operations with the protection of the environment being a top priority. For example; if the applicant does not have enough actual money in the bank to carry out the project, this would lead to cutting corners and omitting crucial safeguards. Additionally, the track record of the applicant should be included in the DEIR to completely appraise their ability, based on experience and issues in the past. The CEO of Rise happens to be in ongoing litigation and under charges of failure to conduct operations according to law in Canada, at his last project. The DEIR would be completely remiss if this information is not stated clearly. The fact of his non-compliance with environmental laws, compromises the current project proposal, and should not be omitted from the DEIR, as it directly relates to how effective mitigation of environmental damage can be implemented. Here is the information about the CEO's past, his entire bond being confiscated and the company gone bankrupt:
https://s3.documentcloud.org/documents/3539874/Banks-Island-Gold-Charges-March-2017.pdf

https://iknnews.com/rise-gold-rise-v-ben-mossman-up-to-his-tricks-again/

SUPERFUND SITE:
Ind 804-30
The Idaho Maryland Mine is still considered a superfund contaminated site, and must be stated in the DEIR as such. No project should be allowed a permit before the complete clean up has been done. This also goes for the Centennial site. The Centennial site must also be included in the project as a whole, and not treated separately. This is stated clearly in CEQA.

ALTERNATIVES:
Ind 804-31
The DEIR fails to offer other alternatives, such as a project that has nothing to do with gold mining, and promotes the current economy of the area with non invasive, non-risk prone options. Given the attraction to this area by tourists, for the quality of nature and outdoor activities, a Visitor Center would be of great importance to this mine site. Additionally, walking & biking trails with RV camping and an Amphitheater. This is an example of one good option, that will build upon the clean environment we now enjoy, and a continued evolution away from the devastating and toxic heavy industry of gold mining.

INDIVIDUAL LETTER 804: TONY LAURIA

Response to Comment Ind 804-1

The commenter states that the DEIR is deficient because it allegedly misclassifies impacts that cannot be mitigated to less than significant. The specific comments are responded to below. The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 804-2

The commenter states that the DEIR does not address drought and is concerned with the impact on soils and vegetation from the dewatering of the mine. The commenter states that hydrological studies of how dewatered mines impact groundwater wells are proven to be inaccurate, but does not explain why. The commenter states that the DEIR underestimates the number of groundwater wells to be impacted by the dewatering of the mine. Lastly, the commenter states that the DEIR fails to analyze all groundwater wells within the mineral rights boundaries because dewatering could potentially impact those wells. The commenter states that the DEIR fails to define the potential area of impact to groundwater wells.

Regarding drought, the DEIR discusses drought in the context of climate change and states that climate change leads to more extreme, prolonged drought. (DEIR, pp. 4.3-15–16.) The DEIR also references several Executive Orders that address drought in the state. (DEIR, pp. 4.3-32–33.) Drought is also discussed in Chapter 4.11 (Public Services and Utilities) in the context of Nevada Irrigation District's (NID) efforts to address water shortages. In regard to drought related to groundwater impacts of the project, the commenter is referred Master Response 16 – Drought and Climate Change.

As to the impacts to soil and vegetation from the dewatering of the mine, the DEIR states that it can be reasonably concluded that the dewatering of the mine would not affect the available moisture for vegetation in the project area because the depth to groundwater is already below the typical rooting depths in higher topographic areas, while adequate flows would occur in South Fork Wolf Creek and Wolf Creek to maintain groundwater levels in the lower topographic areas. (DEIR, p. 4.13-21.) The commenter is also referred to Master Response 22 - Groundwater Dependent Vegetation.

Regarding the assertion that the DEIR underestimates the number of impacted groundwater wells, the commenter is referred to DEIR Chapter 4.8 (Hydrology and Water Quality) and Master Response 14 – Adequacy of Groundwater Model. The dewatering of the mine is also unlikely to impact additional wells beyond the 30 wells in the East Bennett Area because the drawdown of groundwater would largely be limited to the East Bennett Area based on the proximity of the mine workings to the surface. (DEIR, p. 4.8-54.) The commenter also asserts that the groundwater analysis should have contemplated mining within the entire 2,585-acre mineral rights area and that insufficient data was used in the groundwater model. There are not valuable gold deposits within the entire 2,585-acre mineral rights area; thus, presuming that mining would occur in the entire mineral rights area would not be accurate. Moreover, the applicant has specific areas that will be targeted for gold extraction, and the groundwater model is based on that plan, along with reasonable assumptions about potential extension of mining into other areas. The groundwater model did look at potential drawdown within the entire mineral rights area, but only a small number of wells were shown to have a significant impact, prior to mitigation. The commenter is referred to Master Response 7 - Location of Future Mining Areas. Notwithstanding the above, as noted in Master Response 7, to address public concerns regarding the scope of future mining within the

mineral rights area, the applicant has agreed to an enforceable condition of approval that will limit the area of permitted underground mining to a smaller area within the mineral rights area (shown on maps A101, A201 and A202).

The commenter states that there is no definition mentioned in the DEIR as to the potential area of impact to wells and believes the area of impact should be the entire mineral rights boundary. However, Chapter 4.8 the DEIR clearly provides a definition of the threshold of significance for water drawdown induced by the mine dewatering and displays the area of simulated drawdown in Figure 4.8-11 and in Appendix K.2 (Groundwater Hydrology and Water Quality Analysis) and K.3 (Groundwater Model Report) of the DEIR. The simulated drawdown is based on the modeled geology and location of the underground mine workings, amongst other factors. Please also see Master Response 7.

Please also see Master Response 15 – Adequacy of Groundwater Monitoring Wells, for an updated description of the proposed monitoring approach, which now also includes a proposal by the applicant to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 804-3

The commenter states that there is no guarantee that mining will be restricted to the areas in the vicinity of the Idaho-Maryland Mine site (the existing mine workings) and thus no guarantee that impacts will be confined to the immediate vicinity of the mine site. However, it is unrealistic to assume that economic gold mineralization exists everywhere within the mineral rights at 500 feet below surface. The commenter is referred to Master Response 7 – Location of Future Mining Areas. Groundwater monitoring wells are proposed and required over a large spatial area inside and outside of the mineral rights area and Mitigation Measure 4.8-2(a) requires a rigorous groundwater monitoring plan (GMP). As also noted in Master Response 15, the applicant has provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

The commenter states that sophisticated daily monitoring systems must be installed, and professional services hired to evaluate the data and that the data must include volume, flow, and water quality. Sophisticated groundwater monitoring systems which collect data at once every 1 to 4 hours are already proposed for the project. Qualified hydrogeologists would evaluate the data from groundwater monitoring. Water quality baseline data is already proposed to be collected. Volume and flow (well yield) information is not required to be collected in the groundwater monitoring program but may be collected, if necessary, as part of the Well Mitigation Plan. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that a well thought out plan of action must be created for reporting changes or failures of a well when mine dewatering begins. An agency must be established as primary contact for this reporting, and immediate water replacement services engaged. A “plan of action”, including well monitoring and well mitigation plans, are already required for the project. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells. As stated in Mitigation Measures 4.8-2(a) and 4.8-2(b), the Nevada County Environmental Health Department is the agency responsible for oversight of well monitoring and well mitigation.

Response to Comment Ind 804-4

The commenter states that NID infrastructure must be in place before any dewatering or mining operations begin because the infrastructure (pipelines) is not currently available to many well owners and such infrastructure must be ready for immediate service to all wells within the mineral rights boundary. As stated in Mitigation Measure 4.8-2(c), the East Bennett Area must be connected to the NID system prior to dewatering. Impacts to other areas are not projected and therefore the connection of all properties within the mineral rights is not justified nor required. However, mitigation measures are included in the DEIR to ensure that monitoring provides sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that the performance standard for well mitigation should be equal to the well volume (yield) currently available at each well and that the 5/8-inch service connection proposed in the Well Mitigation Plan for the East Bennett Area is not sufficient**.** The Well Mitigation Plan has been edited to clarify the performance standards required for Well Mitigation (see Appendix D to this Final EIR for an updated Well Mitigation Plan). Performance standards are based on actual use of water for similar property types and not the maximum potential of domestic water wells. A 5/8" service connection is used by 75% of NID treated water accounts and is adequate for the single-family homes located on E. Bennett Road.[3]

Response to Comment Ind 804-5

The commenter states that all costs for well monitoring, NID infrastructure, and monthly service charges must be the permanent responsibility of the applicant. These costs are the responsibility of the applicant where well mitigation is required. The applicant is not responsible for reimbursement of water charges for any party that purchases one of the 30 East Bennett Area properties after the installation of the NID connection because that party would purchase with knowledge of NID service. Please refer to Mitigation Measure 4.8-2(c), which requires the applicant to fully fund the connecting of 30 properties in the East Bennett Area to the NID potable water system. The commenter is also referred to Appendix K.9 (Idaho-Maryland Well Mitigation Plan) of the DEIR.

The commenter states that water charges must be a permanent responsibility and not end with the sale of a property or annexation into the City of Grass Valley. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The commenter states that NID infrastructure must be in place because there must be an immediate replacement available and ready to turn on should a domestic water well be drained or damaged. As stated in Mitigation Measure 4.8-2(c), the East Bennett Area must be connected to the NID system prior to dewatering. Impacts to other areas is not projected and therefore the connection of all properties within the mineral rights is not justified nor required. However, mitigation measures are required in the DEIR to ensure that monitoring provides sufficient time to predict adverse impacts to domestic wells before they occur so that appropriate mitigation measures can be implemented. The commenter is referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells.

[3] See Table 1 of NID Capacity Charge Update 2014
https://www.nidwater.com/files/0795f5c27/NIDCapacityChargeUpdate-2-12-14.pdf

Response to Comment Ind 804-6

The commenter states that the applicant must post a massive bond of many millions for possible contamination of domestic water wells. The mining activities will lead to the partial drawdown of groundwater, rather than direct recharge to the domestic wells; thus, the mining activities at the project site should not affect the water quality of the domestic wells. (DEIR, Appx. K.8, p. 14.). The commenter is also referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells, which describes the proposed domestic well monitoring plan, inclusive of water level and water quality monitoring. Therefore, a bond for contamination of domestic water wells is not required nor appropriate for the project.

The commenter states the applicant must post a massive bond of many millions for possible and damage to residential foundations from underground blasting, that all homes within the "blast zones" must be inspected prior to operations, and a plan for claiming damages must be in place. As stated on page 4.10-54 of the DEIR, ground borne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the U.S. Bureau of Mines' (USBM) recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program which will ensure that vibrations are never high enough to damage buildings. Therefore, a bond for damage to structures from underground blasting, pre-inspection of homes and a plan for claiming damages, is not required or appropriate for the project.

Response to Comment Ind 804-7

The commenter states that the level of water use required for the project is unacceptable during a drought. As required by state law, a Water Supply Assessment was prepared for this project which found that NID's existing and additional planned future water supplies are sufficient to meet the NID's existing water demands, including those future water demands associated with the project. (DEIR, Appx. N, p. 2.) The project's water usage will be subject to any applicable water demand cutbacks during droughts, similar to other NID potable water customers who are served by NID. (DEIR, p. 4.11-42.) The commenter is referred to Master Response 16 – Drought and Climate Change.

Response to Comment Ind 804-8

The commenter states that the dewatering of the mine will create a backflow of contamination into existing wells. The commenter suggests a threshold of significance of zero drawdown due to current drought conditions. The selection of the 10% reduction as a threshold of significant is discussed in Section 3.2.1, page 80, of Appendix K.2 of the DEIR. Simulations using the Theis equation (Domenico and Schwartz, 1990) indicate that reductions in the water column of 20 percent to 40 percent could cause the production rate of the well to become unstable by incrementally decreasing the water column much more than would occur under existing conditions. For this analysis, a 100 percent factor of safety is applied to the potential reduction resulting in unstable conditions, such that a criterion of 10 percent of the water column is used to define wells that might be substantially affected by dewatering of the underground mine workings. The commenter is also referred to Master Response 16 – Drought and Climate Change.

The mining activities will lead to the partial drawdown of groundwater, rather than direct recharge to the domestic wells; thus, the mining activities at the project site should not affect the water quality of the domestic wells. (DEIR, Appx. K.8, p. 14.) Therefore, a backflow of contamination into domestic water wells from mining activities would not occur. The commenter is also referred to Master Response 15 - Adequacy of Groundwater Monitoring Wells, which describes the proposed domestic well monitoring plan, inclusive of water level and water quality monitoring.

Response to Comment Ind 804-9

This comment is general in nature and states that the concerns voiced in the letter are not speculative. Responses to specific comments are provided in the responses above. The DEIR has extensively analyzed impacts to domestic water wells from mine dewatering and found the impact to be less than significant after mitigation measures. (see Mitigation Measure 4.8-2.)

Response to Comment Ind 804-10

The commenter states that the DEIR's analysis of air quality impacts is deficient because there is insufficient data regarding the presence of asbestos in serpentine rock underground. The commenter states that asbestos and crystalline silica will be released into the atmosphere, which cannot be mitigated to less than significant. The commenter does not state how the data provided in the DEIR is insufficient.

With regard to air quality, the Health Risk Assessment prepared for the DEIR found that the project would not result in exposure of sensitive receptors to substantial concentrations of toxic air contaminants with the implementation of the required Mitigation Measure 4.3-1(b). (DEIR, p. 4.3-79.) Regarding the commenter's assertion of insufficient data regarding the presence of asbestos in serpentinite rock, the Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan details the methods and data collected. The Project Applicant completed 19 exploration drill holes, totaling 67,500 feet of drilling. Forty-two samples from the Idaho-Maryland Mine were submitted for asbestos testing in 2019. Forty samples were evaluated for asbestos using both Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM). Significant concentrations of asbestos were not detected. (DEIR, Appx. E-2, p. 7.) The commenter is also referred to Master Response 23 – Adequacy of Asbestos Sampling. Regarding the release of asbestos and crystalline silica into the atmosphere, the commenter is referred to Master Response 23 – Adequacy of Asbestos Sampling, and Master Response 21 – Conservatism of Silica Assumptions.

Response to Comment Ind 804-11

The commenter states that exhaust from diesel trucks and heavy equipment operation can only be mitigated by electric vehicles and equipment. The commenter states that because this technology does not exist, it is impossible to mitigate this impact to less than significant. The DEIR found that with the project design measures (i.e., APM-AQ-1 (Exhaust Emission Controls) and APM-AQ-2 (Surface Fugitive Dust Controls)), and Mitigation Measures 4.3-1(a) and 4.3-1(b), emissions impacts would be less than significant. (DEIR, 4.3-73.) Moreover, CEQA requires lead agencies to impose *feasible* mitigation measures. (CEQA Guidelines §§ 15041(a); 15126.4(a).) The term "feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period time, taking into account economic, environmental, legal, social, and technological factors." (Pub. Res. Code, § 21061.1.) Mitigation measures that are technologically infeasible are not legally required to be considered in the DEIR.

Response to Comment Ind 804-12

The commenter states that the DEIR inadequately describes traffic-related impacts to Brunswick Road, State Route 174, and Bennett Street, but does not how the DEIR is deficient. The commenter also states the DEIR omits any reference traffic generated by 600 employees working at the site.

The DEIR analyzes project trip generation in Chapter 4.12, including trips generated by employees and trucks at the project. (DEIR, p. 4.12-31–34.) The DEIR found that, for all segments along Brunswick Road, E. Bennett Road, and State Route 174, the project's traffic-related impacts would be less than significant. (DEIR, p. 4.12-67.) The DEIR did find that the Brunswick



Road/State Route 174 intersection would be significant and unavoidable. (DEIR, p. 4.12-56.)[4] Regarding the 600 employees, the project's total workforce is estimated to reach 312 employees. (DEIR, p. 4.9-25.) Because a large majority of the workforce would operate in 12-hour shifts, with seven days on and seven days off, only 111 employees would be present at the project at any one time. (DEIR, Table 4.9-6.)

Response to Comment Ind 804-13

The commenter states that the DEIR fails to evaluate impacts associated with evacuation from wildfire, specifically Greenhorn Road. The DEIR found that the project's impacts to emergency response plan or emergency evacuation plan would be less than significant. (DEIR, p. 4.7-36.) The DEIR also explains that in the event that residents of Greenhorn Road would need to be evacuated, the County would instruct the Idaho-Maryland Mine to cease all operations, including trucking operations. (DEIR, p. 4.7-38.) Residents of Greenhorn Road would utilize Brunswick Road to evacuate to the primary evacuation route of State Route 49/20. The commenter is also referred to Master Response 5 – Evacuation Zones.

In addition, as stated above regarding the 600 employees, the project's total workforce is estimated to reach 312 employees. (DEIR, p. 4.9-25.) Because a large majority of the workforce would operate in 12-hour shifts, with seven days on and seven days off, only 111 employees would be present at the project at any one time. (DEIR, Table 4.9-6.)

Response to Comment Ind 804-14

The commenter states that the DEIR inadequately describes the wildfire risk of storing fuel and explosives on site. The commenter also states traffic generated by the project could interfere with any firefighting response during a wildfire. The DEIR found that the project's impacts associated with the transport, use, and disposal of hazardous materials would be less than significant. (DEIR, p. 4.7-22.) As the DEIR notes, the use and transport of explosives for mining operations is tightly regulated and has a reputable safety record, with only a handful of incidents in the past 30 years. (DEIR, pp. 4.7-23–28.) Moreover, the storage of diesel fuel and other hazardous chemicals at the project site would require a number of permits and regulatory approvals, including registration with the local Certified Unified Program Agency (CUPA), in this case the Nevada County Environmental Health Department (NCEHD). (DEIR, p. 4.7-30.) Compliance with applicable federal, state, and local regulations would minimize the project's potential to pose a significant hazard to the public or the environment. (*Ibid*.) Regarding the potential for traffic to impact firefighting operations, the commenter is referred to Master Response 5 – Evacuation Zones, and Master Response 6 – Wildfire Impacts.

Response to Comment Ind 804-15

As stated on page 3-46 of the DEIR, the application to rezone the parcels located at the Brunswick Industrial Site from M1-SP to Light Industrial with Mineral Extraction Combining District (M1-ME) is to allow for surface mining facilities related to the underground mining operations, pursuant to

[4] While the impact was determined to be significant and unavoidable, Mitigation Measure 4.12-1(b) of the DEIR requires the applicant to enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%. While the project is contributing toward addressing its contribution of traffic to the SR 174/Brunswick Road intersection, the remaining funding needed to improve the intersection (e.g., signalization) is not yet certain, nor secured. As a result, the DEIR conservatively concludes that the impact would remain significant and unavoidable.

the Nevada County LUDC, Section L-II 2.7.3. The property would remain zoned M1 (light industrial) and would not be zoned as M2 (Heavy Industrial).

Land use and zoning issues are discussed and analyzed in Chapter 4.9 of the DEIR. As stated on page 4.9-16, subsurface mining is allowed in all base districts subject to the approval of a Use Permit. Therefore, rezoning to industrial is not required for subsurface mining.

Response to Comment Ind 804-16

The commenter states that the DEIR does not mention the risk of transporting explosives to the project site. The commenter also states that the use of explosives in the Idaho-Maryland Mine underground workings will cause disturbances to the surface and damage residences. The commenter is referred to Response to Comment Ind 804-14 regarding the safety record of the use and transportation of explosives. Chapter 4.7 of the DEIR provides discussion and analysis of explosives transport, storage, and use, which are found to have a less than significant impact after mitigation. Chapter 4.10 of the DEIR provides discussion and analysis of blasting vibration and the effect on structures. As stated on page 4.10-54 of the DEIR, groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the United States Bureau of Mines (USBM) recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 requires a Ground Vibration Monitoring Program out of an abundance of caution, which will ensure that vibrations are not high enough to damage buildings.

Response to Comment Ind 804-17

The commenter states that inaccurate measurements are found in the DEIR but does not provide specifics as to which measurements are inaccurate. Chapter 4.10 of the DEIR provides discussion and analysis of noise impacts from the project.

Response to Comment Ind 804-18

The commenter states that vibration has not been addressed properly in the DEIR. However, Chapter 4.10 of the DEIR provides discussion and analysis of vibration and is found to have a less than significant impact after mitigation. The impact to new residential housing at Brunswick and Idaho-Maryland Roads would also be less than significant after mitigation. As stated on page 4.10-58 of the DEIR, the Sierra Nevada Memorial Hospital and Downtown Grass Valley would not experience any ground vibration associated with the proposed project. Dental and vision offices in Brunswick East were not specifically evaluated. However, other structures/businesses in the surrounding area were analyzed to determine potential risk. Analog Devices may experience ground vibrations up to a maximum of 0.07 in/s PPV, which is below the limit that humans can feel.

Chapter 4.10 of the DEIR provides discussion and analysis of blasting vibration and the effect on structures. As stated on page 4.10-54 of the DEIR, groundborne vibrations calculated for blasting of both drift round and long-hole stopes, respectively, fall below the USBM recommendations and the levels at which structural damage to buildings is possible. Mitigation Measure 4.10-4 conservatively requires a Ground Vibration Monitoring Program that will ensure vibrations are not high enough to damage buildings.

Response to Comment Ind 804-19

Mitigation Measure 4.10-3 of the DEIR requires a comprehensive noise monitoring program and requires all on-site mobile equipment to be fitted with broad-band “growler” type back-up warning devices rather than conventional “beeper “devices.

Response to Comment Ind 804-20

The commenter states that the DEIR must fully disclose the potential impacts of dewatering the Idaho-Maryland Mine to private groundwater wells. The commenter also states that the potential devaluation of property from impacts to groundwater wells must be analyzed in the DEIR. The DEIR evaluated the impact of mine dewatering on domestic groundwater wells and the impact is found to be less than significant after mitigation. The commenter is referred to Chapter 4.8 of the DEIR. The commenter is also referred to Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Regarding the potential devaluation of property values, economic impacts are not a CEQA issue and are not analyzed in the DEIR. The commenter is referred to Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 804-21

The commenter states very little has been mentioned about impacts to wildlife (including noise impacts of wildlife) and endangered species in the DEIR. The commenter also states that the discharge to South Fork Wolf Creek will adversely impact riparian habitat. However, Chapter 4.4 of the DEIR provides discussion and analysis of these issues and the impacts are found to have a less than significant impact after mitigation. (DEIR, p. 4.4-68, 80.) The project will not result in any water discharge to Wolf Creek. Increased flow in South Fork Wolf Creek will not scour the banks and remove all forms of invertebrates, bacteria, and other lifeforms. The commenter is referred to Master Response 36 - Flows in South Fork Wolf Creek. Chemical changes in creek water will not impact aquatic life or other animals. The commenter is referred to Master Response 35 - Discharge to South Fork Wolf Creek. As stated in Appendix M (Blasting Report), the anticipated impact from drilling and blasting surrounding the proposed Idaho-Maryland Mine is negligible, and in almost all situations will be unnoticeable and undetectable. Blasting would take place twice daily between shift changes at 7AM and 7PM. Therefore, there would be no impact to wildlife from blasting vibrations.

Response to Comment Ind 804-22

The commenter states there is no mention of the Nisenan Tribe in the DEIR. However, the Nevada City Rancheria Nisenan Tribe is discussed in Chapter 4.5 of the DEIR and cultural and tribal resources were analyzed in Chapter 4.5 of the DEIR.

Response to Comment Ind 804-23

The commenter states that the DEIR fails to mention that heavy metals leach from concrete or that hexavalent chromium will be used in the Cement Past Backfill (CPB). The commenter also states that CPB will contaminate the private wells via groundwater. Chapter 4.8 of the DEIR provides discussion and analysis of water quality, including hexavalent chromium, in relation to CPB and is found to have a less than significant impact after mitigation. Regarding the assertion that the CPB will impact private wells, any water that contacts the CPB would be present only within the mine workings and would be pumped out of the mine workings by the dewatering system. As a result, that water would not have the potential to flow into the fractured bedrock and flow toward any domestic supply wells. The dewatering causes a low pressure area around the underground workings such that groundwater inflow is toward the mine, not from the mine toward the domestic wells. (DEIR, p. 4.8-48.)

Once mining is completed, dewatering ceases, and the underground workings are allowed to flood with groundwater and are anticipated to refill over several years. No further impacts to water levels in domestic wells could occur during this period. As discussed on page 119 of Appendix K.2, after mining ceases, conditions would return to those that currently exist. The proposed new

mining activities would all occur at depths that are comparable to or much deeper than the historic mine workings. (DEIR, p. 4.8-49.) Due to the substantial reduction in hydraulic conductivity at those depths, compared to the depths of the domestic supply wells, it is highly unlikely that the proposed project would affect water quality in those wells. (*Ibid*.) The arbitrary selection of 5 years of monitoring after mine closure and reflooding is not supported by the analysis. However, there will be water quality specific financial assurances for closure and post-closure maintenance of mining units as required by Title 27 section 22510. (DEIR, p. 4.8-30.) This may include the need for post closure water monitoring. This issue will be addressed in the approval of the WDR required by Mitigation Measures 4.8-1(d) and 4.8-1(e)).

Response to Comment Ind 804-24

The commenter states that the DEIR does not address how the project might contribute to climate change. Chapter 4.3 of the DEIR provides a discussion and analysis of the project's contribution to climate change and is found to have a less than significant impact after mitigation.

The commenter is also referred to Master Response 25 – Nevada County Energy Action Plan. As stated on page 4.3-89 of the DEIR, the Energy Action Plan (EAP) is not a Qualified GHG Emissions Reduction Plan under CEQA pursuant to the requirements outlined in the CEQA Guidelines, Section 15183.5(D); therefore, no CEQA document can tier from the County EAP. Nevertheless, the project's compliance with EAP strategies has been analyzed and the project was found to be consistent with the EAP. (DEIR p. 4.3-90.)

Response to Comment Ind 804-25

The commenter states the DEIR fails to discuss a fault running under the project site and must be analyzed in connection with blasting. The DEIR concluded that there is likely a fault located on or near the site, within 600 feet of the New Brunswick shaft. (DEIR, p. 4.6-31.) As discussed in Section 4.5-1 of the DEIR, based upon substantial evidence in the record, the project includes a request to amend the Final Map for Bet Acres recorded in February 1987 in Book 7 of Subdivision Maps at Page 75 to remove the "200' Building Setback From Fault", as shown on Sheet 4 of Final Map #85-7. (DEIR, p. 4.6-31–32.) In addition, a management plan was prepared pursuant to Nevada County LUDC Section L-II 4.3.8 to address potential seismic hazards associated with the previously-identified inferred fault alignment. (*Ibid.*) It is NV5's professional opinion that the subject fault, identified on the property in Map 85-7, does not qualify as a seismically active area as defined by Nevada County LUDC Section L-II 4.3.8.B, and the proposed project development within the designated building setback fault zone is generally feasible from a geotechnical engineering standpoint. (*Id*. at 4.6-32.) While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a significant impact could occur without mitigation. Mitigation Measure 4.6-1 requires that prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department.

The commenter states there are many documented incidents of failures involving high explosives on and within a seismic fault but does not provide this evidence. The magnitude of the energy released during mining excavations by rock removal and rock placement is much smaller than the magnitude of energy activation required to trigger the release of a local pre-Holocene fault. No analysis was performed nor is necessary, as there is no potential for inducement of seismic activity on these faults from the proposed mining activity. The commenter is referred to the NV5 Memo attached to the Final EIR as Appendix P.

Response to Comment Ind 804-26

The commenter states the project will bring numerous workers employees from outside Nevada County and increased law enforcement will be necessary to protect the population from "transient workers." Chapter 4.11 of the DEIR provides a discussion and analysis of the project's impact on public services. As stated on page 4.11-27, the Nevada County Sheriff's Office services would not be adversely affected by the proposed project, and the headquarters would not require an expansion to enable the Nevada County Sheriff's Office to adequately serve the proposed project in addition to current demands. Moreover, the commenter's suggestion that "transient workers" would engage in criminal acts is mere speculation. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

The commenter also states that the project will adversely impact private wells in the area, but does not provide specific reasons. The DEIR evaluated the impact of mine dewatering on domestic water wells and the impact is found to be less than significant after mitigation. Please see Chapter 4.8 of the DEIR. Chapter 4.10 of the DEIR provides discussion and analysis of noise and is found to have a less than significant impact after mitigation.

Response to Comment Ind 804-27

The commenter states that trucks and industrial equipment associated with the project will create adverse aesthetic impacts. Visual simulations and analysis of the aesthetics impacts of the engineered fill piles have been analyzed in Chapter 4.1 of the DEIR. The DEIR determined that the project has a significant and unavoidable aesthetics impact, in part due to the engineered fill piles. The inclusion of industrial vehicles and mining equipment in the aesthetics analysis would not change the significance finding.

Response to Comment Ind 804-28

The commenter states that the DEIR does not provide for monitoring the various mitigations and regulatory standards. The commenter also states the Project Applicant will not self-monitor based on experience with the Project Applicant's prior projects. The mitigations measures for the project, as proposed in the DEIR, will form the basis of the Mitigation Monitoring and Reporting Program (see Chapter 4 of this Final EIR). (DEIR, p. 2-4.) Regarding the comment on the Project Applicant, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 804-29

The commenter states that the DEIR should analyze the financial status of the Project Applicant with regards to the ability to carry out the project. The commenter also references the Project Applicant's prior mining work in Canada, but does not comment on the adequacy of the DEIR. CEQA does not require an examination of the Project Applicant's financial status and that information is not required to be in the DEIR. A lead agency addresses financial concerns elsewhere during the approval process, such as financial assurances in a Conditional Use Permit or Reclamation Plan. Regarding the comments on the Project Applicant, the commenter is referred to Master Response 3 – Operator Responsibility.

Response to Comment Ind 804-30

The commenter states that the Idaho-Maryland Mine is a superfund site and states that the Centennial Industrial Site cleanup action must be included in the DEIR. The Idaho-Maryland Mine is not a superfund site. The commenter is referred to Master Response 9 - Historical Mine Waste at Centennial Site. The Centennial site cleanup project is a separate project. Regarding the assertion that the Idaho-Maryland Mine and the Centennial Industrial Site cleanup must be one

project, the commenter is referred to Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 804-31

The commenter states that the DEIR should include analysis of alternative projects that have no relation to gold mining, such as a visitor center or amphitheater. CEQA alternatives are optional ways that the project could achieve most of the project's basic objectives, while also reducing or eliminating environmental impacts. (Pub. Res. Code, § 21002.) The suggested alternatives would not meet most of the basic objectives of the project. The DEIR must evaluate a range of reasonable alternatives. (CEQA Guideline § 15126.6(a).) What constitutes a reasonable range of alternatives will vary with the facts of each project and should be guided only by the purpose of offering substantial environmental advantages over the project proposal which may be feasibly accomplished in a successful manner considering the economic, environmental, social and technological factors involved. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 5 Cal. 3d 553, 566.) The DEIR need not consider every conceivable alternative to a project. (CEQA Guidelines § 15126.6(a).)

Individual Letter 805

From: Tulum Dothee
To: bdofsupervisors
Cc: Sue Hoek
Subject: Idaho-Maryland Mine: NO!
Date: Wednesday, March 23, 2022 6:28:36 PM

Dist 4

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Ind 805-1

I vehemently OPPOSE the reopening of the Idaho-Maryland Mine.

My family & I moved to Nevada County 20+ years ago to enjoy a cleaner, quieter life. We own a home, business, work, eat, shop, and recreate here.

The Mine is detrimental to our quality of life and will cause many of your constituents to leave the County.

Thank you for your time.

Tulum Dothee, Rough & Ready

Tulum Dothee
Oakhaven Montessori School 13345 Rough and Ready Highway
Rough and Ready CA 95975
530 271-1258
http://www.oakhavenmontessori.com

INDIVIDUAL LETTER 805: TULUM DOTHEE

Response to Comment Ind 805-1

The comment does not address the adequacy of the DEIR, but rather expresses quality of life concerns, which are outside the scope of CEQA. Please see Master Response 1.

Individual Letter 806

From: Turiya Hill <turiya@jps.net>
Sent: Saturday, March 26, 2022 4:35 PM
To: Idaho MMEIR
Subject: NOOOOO to the RiseGrass Valley Mine

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ATTENTION: Matt Kelly, Senior Planner

Ind 806-1

Dear Mr. Kelly

I and thousands of Nevada County residents vehemently oppose the presence of this mine. It will degrade our county in countless ways.

All the valid reasons are out there. Please listen.

Turiya Hill
www.clearstreamacupuncture.
572 Searls Ave.
Nevada City

1

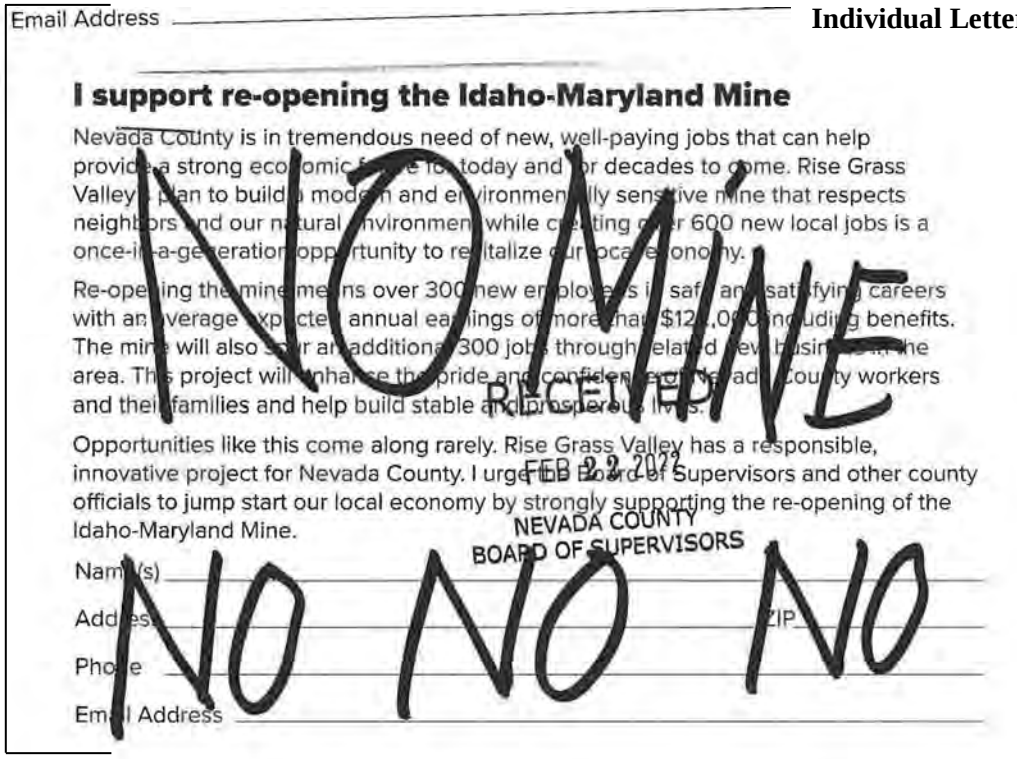
INDIVIDUAL LETTER 806: TURIYA HILL

Response to Comment Ind 806-1

The comment does not address the adequacy of the DEIR, but rather expresses concerns regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 807

Ind
807-1



Email Address

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $120,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s)

Address ZIP

Phone

Email Address

NO MINE

RECEIVED
FEB 22 2021
NEVADA COUNTY
BOARD OF SUPERVISORS

NO NO NO

INDIVIDUAL LETTER 807: UNKNOWN (1)

Response to Comment Ind 807-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 808

I support re-opening the Idaho-Maryland M.....

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Ind 808-1

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) NO MINE

Address ZIP

Phone

Email Address

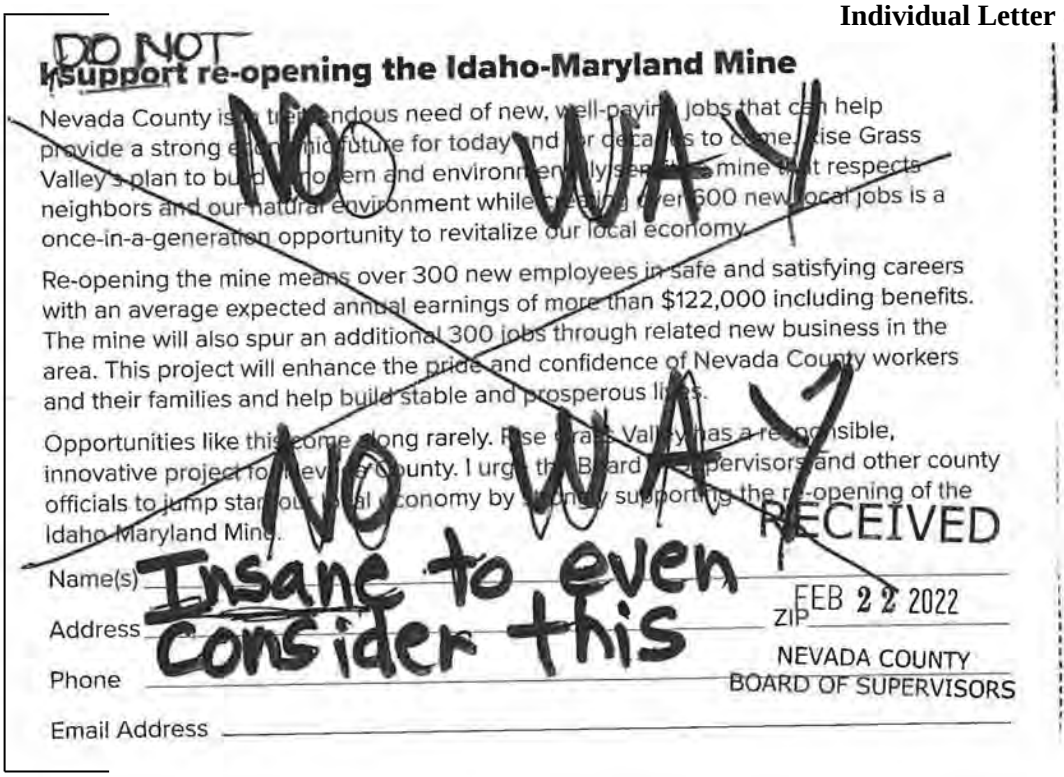
INDIVIDUAL LETTER 808: UNKNOWN (2)

Response to Comment Ind 808-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 809

Ind 809-1



DO NOT
I support re-opening the Idaho-Maryland Mine

NO WAY

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

NO WAY

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Insane to even consider this

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

INDIVIDUAL LETTER 809: UNKNOWN (3)

Response to Comment Ind 809-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 810

Ind 810-1

no name provided

DO NOT SUPPORT THE

I [redacted] re-opening the Idaho-Maryland Mine

HA HA HA

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

THEY'll Bring outsourced Workers & Pollution TO OUR WATER!

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Resident

Address Grass Valley CA ZIP

Phone

Email Address

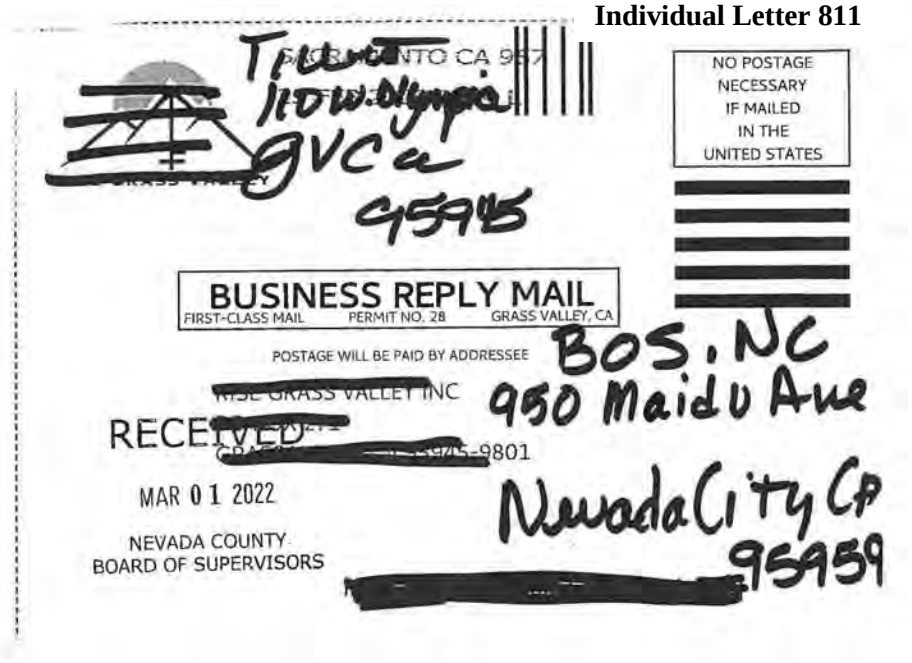
INDIVIDUAL LETTER 810: UNKNOWN (4)

Response to Comment Ind 810-1

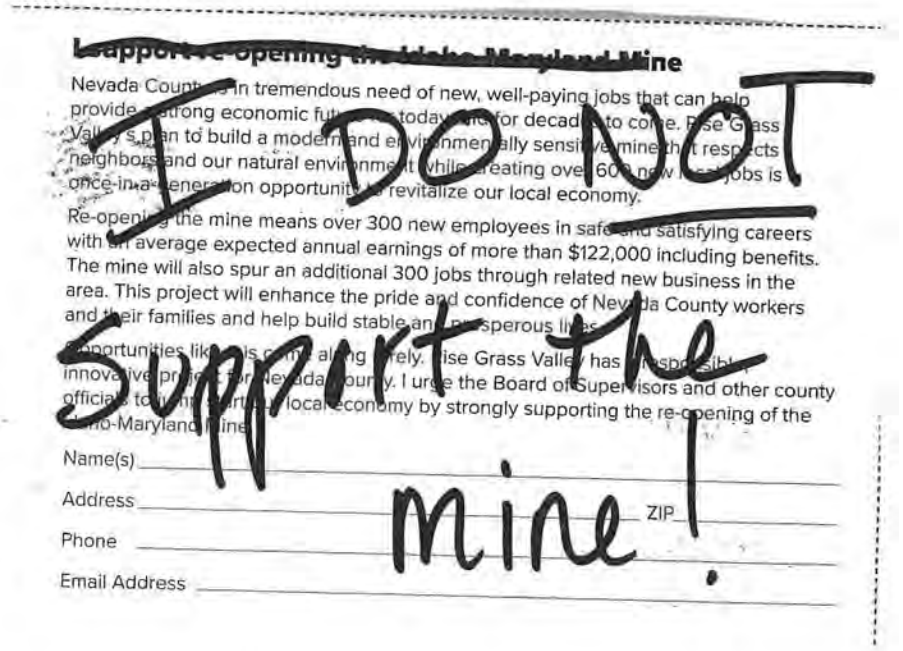
The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. Please see Chapter 4.8, Hydrology and Water Quality, and Master Response 35 regarding water pollution concerns. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 811

Dist 3



Ind 811-1



INDIVIDUAL LETTER 811: UNKNOWN (5)

Response to Comment Ind 811-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 812

Reasons to oppose the Mine:

	Reasons to oppose the Mine:
Ind 812-1	The mine will pollute our air and increase lung disease. Clouds of airborne toxic mining dust, including asbestos, will drift downwind into Grass Valley.
Ind 812-2	If approved, this mine would operate 24 hours a day, 7 days a week, for up to 80 years There is serious risk to our health, our environment, our property value, and our peace and quiet.
Ind 812-3	Hard rock mining is the single largest source of toxic waste in the United States.
Ind 812-4	Vast amounts of diesel exhaust will be produce from continuous operation, including the trucking in of explosives.
Ind 812-5	A large factory on Brunswick Rd. is in the middle of hundreds of family homes (zoned residential)
Ind 812-6	Crushing of 1,500 tons of mine waste rock every day, all day, using massive machines.
Ind 812-7	Trucks hauling 1,000 tons of waste rock, 100 trips every day, down Brunswick Road, piling it higher than a 6-story building at the Centennial site.
Ind 812-8	Blasting 7 days a week in the tunnels under 2,585 acres of the Grass Valley area (see map)
Ind 812-9	Removal of 1 million to 3 million gallons of contaminated water per day for the next 80 years dewatering hundreds of wells.
Ind 812-10	Waste water will be dumped into South Fork Wolf Creek, destroy habitats and stir up existing toxic residues like mercury, cyanide and lead with disastrous effects for downstream ecosystems
Ind 812-11	Use of over 12% of Nevada County's electricity, more than all the County businesses combined.
Ind 812-12	The Rise Gold CEO already has numerous violations of mining and environmental laws.
Ind 812-13	Claims that a few hundred jobs cannot justify the likelihood of increased lung cancer in Nevada County.
Ind 812-14	Nevada County currently has a surplus of unfilled job positions
Ind 812-15	Business that depends on tourism will be hurt.
Ind 812-16	Homeowners can lose an estimated 20% in their property values and more if the wells are dry,
Ind 812-17	A working mine will shatter the peace and quiet of many neighborhoods.
Ind 812-18	Underground blasting is planned for 7 days a week and will be felt by those living above the 2,585 acres of mine underground mineral rights - see map!
Ind 812-19	While Rise Gold shareholders profit, the local community gets little revenue.
Ind 812-20	The relatively few theoretical jobs gained will not offset the harm done.
Ind 812-21	Where will the imported workers live when housing is so limited in our area?
Ind 812-22	An estimated 85% of vendor spending will not be local (explosives, chemicals, concrete, steel...)
Ind 812-23	Nevada County revenue will be from ordinary property taxes, not from gold.
Ind 812-24	The history and business practices of Rise Gold Corp. do not inspire trust.
Ind 812-25	Rise Gold Corp. has never opened a hard rock mine and has never made a profit on its business ventures.
Ind 812-26	Rise Gold CEO, Ben Mossman, has been charged with environmental violations in B.C. Canada
Ind 812-27	There are many questions about the financial stability of Rise Gold Inc.

INDIVIDUAL LETTER 812: UNKNOWN (6)

Response to Comment Ind 812-1
The commenter's opposition to the project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter also states the project would result in air quality impacts such as asbestos emissions but does not state how the DEIR is inadequate. Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) analyzed air quality emissions and found the impacts to be less than significant after mitigation.

Response to Comment Ind 812-2
The commenter states that the project would operate 24 hours a day, 7 days a week, and would create a serious risk to health, the environment, and property values, but provides not additional information. The project's proposed hours of operation are described in Chapter 3 (Project Description). The project's operational impacts on the physical environment are evaluated throughout the DEIR. The DEIR is not required to evaluate impacts to property values or quality of life for local residents. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 812-3
This comment does not address an environmental concern or the adequacy of the DEIR. No response is required.

Response to Comment Ind 812-4
The commenter is concerned about the air quality impacts from project trucks but does not state how the DEIR is inadequate. The project's estimated operational air emissions and associated impacts are discussed in DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emission, and Energy). Emissions from diesel trucks and equipment are included in the emissions modeling conducted for the project.

Response to Comment Ind 812-5
The commenter states there is a factory on Brunswick Road in a residential area. This comment does not address an environmental concern or the adequacy of the DEIR. Potential conflicts with existing zoning and other land use designations and policies are addressed in DEIR Chapter 4.9 (Land Use and Population and Housing).

Response to Comment Ind 812-6
The commenter is concerned about rock crushing associated with the project. All rock crushing would take place underground as discussed in Chapter 3 (Project Description) of the DEIR. The DEIR addresses the project's operational impacts including those associated with rock crushing. The commenter is referred to DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).

Response to Comment Ind 812-7
The commenter is concerned about impacts from the project's truck traffic but does not provide specifics or state why the DEIR is inadequate. The project's traffic-related impacts are addressed in DEIR Chapter 4.3 (Air Quality, Greenhouse Emissions, and Energy), Chapter 4.10 (Noise and Vibration), and Chapter 4.12 (Transportation). Visual impacts are addressed in DEIR Chapter 4.1 (Aesthetics).

Response to Comment Ind 812-8

The commenter is concerned about underground blasting. The DEIR addresses the project's potential impacts related to proposed blasting in Chapter 4.6 (Geology, Soils, and Mineral Resources) and Chapter 4.10 (Noise and Vibration).

Response to Comment Ind 812-9

The commenter is concerned about the dewatering of the mine. The project's potential impacts to groundwater resources are evaluated in DEIR Chapter 4.8 (Hydrology and Water Quality). As described in discussion of Impact 4.8-1 on DEIR pages 4.8-41 through -53, mine dewatering water would be treated onsite to remove the constituents of concern – iron and manganese. All discharges would be in compliance with permits from the Regional Water Quality Control Board, which would ensure water quality standards are not exceeded. As described in discussion of Impact 4.8-2 on DEIR pages 4.8-54 through -68, modeling of the project's potential impacts to groundwater supplies identified the potential to adversely affect seven domestic water supply wells – not hundreds of wells as the commenter asserts. Each of the groundwater related technical studies prepared for the project was reviewed by a third party with expertise in the field to ensure accuracy and adequacy. The commenter is referred to Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 812-10

The commenter is concerned about contaminants of concern in the treated water discharged to South Fork Wolf Creek. The commenter is referred to Response to Comment Ind 812-9. All discharges to South Fork Wolf Creek would be in compliance with permits from the Regional Water Quality Control Board, which would ensure that water quality standards are not exceeded. The project's potential impacts to downstream riparian habitats are addressed in DEIR Chapter 4.4 (Biological Resources). The commenter is referred to Master Response 35 – Discharge to South Fork Wolf Creek, and Response to Comment Grp 25-30 regarding legacy contaminant concerns.

Response to Comment Ind 812-11

The commenter is concerned about the project's energy consumption. The commenter is referred to Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 812-12

The commenter refers to the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-13

The commenter states that the project will cause lung cancer. The project's potential to emit toxic air contaminants (TACs), such as asbestos, is evaluated in Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy). The impact is found to be less than significant after implementation of mitigation.

Response to Comment Ind 812-14

This comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-15

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 – Social and Economic Impacts.

Response to Comment Ind 812-16

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-17

The commenter states that the project will ruin the peace and quiet for residences surrounding the Idaho-Maryland Mine. The project's potential noise impacts on surrounding residences are evaluated in DEIR Chapter 4.10 (Noise and Vibration). The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 812-18

The commenter states that the project will conduct underground blasting 7 days a week and references the extent of the mineral rights boundary. Regarding the mineral rights boundary, the commenter is referred to Master Response 7 - Location of Future Mining Areas.

Regarding the underground blasting, the project's potential to cause ground borne vibration at existing residences is evaluated in Chapter 4.10 (Noise and Vibration), under Impact 4.8-4. The impact evaluates potential vibration impacts at various sensitive receptors near the project site. Mitigation Measure 4.10-4 requires implementation of a Ground Vibration Monitoring Program to ensure vibration levels remain below 0.4 inches/second at sensitive receptors such as residences. The placement of two seismographs would be required at nearby residences. With this mitigation measure, the impact was determined to be less than significant.

Response to Comment Ind 812-19

The comment does not address an environmental concern or the adequacy of the DEIR. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-20

The commenter references the economic impacts of the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-21

The commenter asks where project employees from outside of the region will live. An evaluation of the project's potential effects related to population growth and housing is provided in DEIR Chapter 4.9 (Land Use and Population and Housing). According to the discussion of Impact 4.9-3 on DEIR pages 4.9-25 through -27, "[d]ue to Nevada County's current vacancy rates, Nevada County has sufficient available housing stock [12,098 vacant housing units] to accommodate the entire estimated workforce for the project" (312 workers).

Response to Comment Ind 812-22

The commenter references the project's economic impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-23

The commenter references the project's economic impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts

Response to Comment Ind 812-24

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-25

The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-26

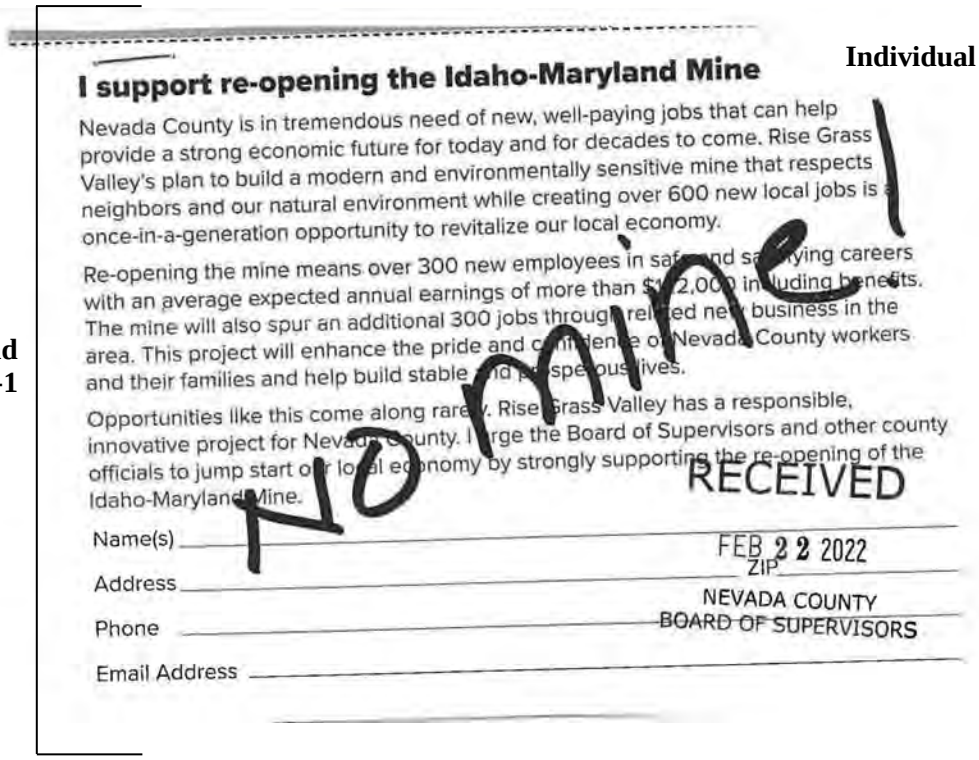
The commenter references the reputation of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Ind 812-27

The commenter references the financial condition of the Project Applicant. The commenter is referred to Master Response 3 - Operator Responsibility.

Individual Letter 813

Ind 813-1



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in saf[illegible]nd sa[illegible]rying careers with an average expected annual earnings of more than $[illegible]2,000 in[illegible]luding benefits. The mine will also spur an additional 300 jobs throug[illegible]rel[illegible]ed ne[illegible] business in the area. This project will enhance the pride and c[illegible]nfidence o[illegible] Nevada County workers and their families and help build stable [illegible]nd p[illegible]spe[illegible]us lives.

Opportunities like this come along rare[illegible]. Rise Grass Valley has a responsible, innovative project for Neva[illegible]ounty. I[illegible]rge the Board of Supervisors and other county officials to jump start o[illegible] lo[illegible]al e[illegible]nomy by strongly supporting the re-opening of the Idaho-Maryland Mine.

No mine!

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ ZIP _____

Phone _____

Email Address _____

INDIVIDUAL LETTER 813: UNKNOWN (7)

Response to Comment Ind 813-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 814

From: notmymine@yahoo.com
Sent: Saturday, April 2, 2022 10:18 PM
To: Idaho MMEIR
Subject: Economic Impact of the Idaho Maryland Mine

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Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have more questions search for Cybersecurity Awareness on the County InfoNet.

board of supervisors, i ask you,
what kind of ancestor do you want to be?
what kind of elder are you?
what kind of legacy do you want to leave?

who stands to lose the most from the mine? the already-disenfranchised, doing their best to survive
and you, the wealthy elite, what do you yourself stand to lose from perpetuating destructive,
extractive, abusive tactics on this land?
when your children's children inherit this earth,
what story will they tell of you and your work?
or more importantly, what will even be left for them?

what will it take for you to see exactly what's at stake?

Ind 814-1

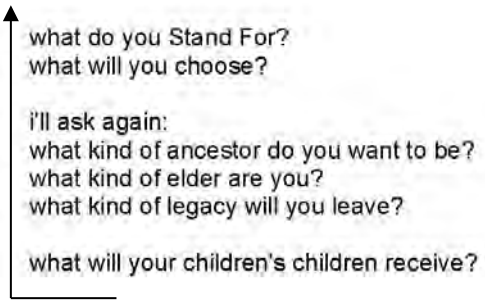
what will it take to stop this transgression?
what storyline needs to be rewritten
for you to understand the enormous harm that will come to pass
by reopening the mine?

reopen your mind
or you will find the harm on your hands
you will find yourself responsible for the harm to this land
you will find your story tainted, your legacy painted with the suffering,
with the degradation of everything that makes this life worth living

open your eyes.
this place is already Gold & golden.
we don't need a mine to turn our insides out and tells us what we're about;
to smoke us out and shush our sound with soot and deafening loud;
to dry our wells and waste our waters with poisons that always stick around
- long after you are gone,
the mine would live on to loot our earth and pollute our air, and harm our kin - the human and other-than

what do you truly stand to gain?
what do we all, truly, stand to lose?

1


what do you Stand For?
what will you choose?
i'll ask again:
what kind of ancestor do you want to be?
what kind of elder are you?
what kind of legacy will you leave?
what will your children's children receive?

INDIVIDUAL LETTER 814: UNKNOWN (8)

Response to Comment Ind 834-1

The comment letter does not address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 815



upport re-opening the Idaho-Maryland Mine

vada County is in tremendous need of new, well-paying jobs that can help
vide a strong economic future for today and for decades to come. Rise Grass
ley's plan to build a modern and environmentally sensitive mine that respects
ghbors and our natural environment while creating over 600 new local jobs is a
ce-in-a-generation opportunity to revitalize our local economy.

-opening the mine means over 300 new employees in safe and satisfying careers
h an average expected annual earnings of more than $122,000 including benefits.
e mine will also spur an additional 300 jobs through related new business in the
ea. This project will enhance the pride and confidence of Nevada County workers
d their families and help build stable and prosperous lives.

portunities like this come along rarely. Rise Grass Valley has a responsible,
novative project for Nevada County. I urge the Board of Supervisors and other county
icials to jump start our local economy by strongly supporting the re-opening of the
ho-Maryland Mine.

me(s) _____

dress _____ ZIP

one _____

ail Address _____

FEB. 28, '22

DEAR PLANNING COMMISSION

WE ARE LONG-TIME RESIDENTS OF THE AREA, JUST OFF BENNETT ROAD. WE, AND OUR NEIGHBORS ARE COMPLETELY OPPOSED TO ANY NEW OR RE-OPENING OF THE MINES. THEY HAD THEIR DAY. PLEASE JUST ALLOW US PEACE IN OUR NEIGHBORHOOD FOR OUR FINAL YEARS — (WITHHOLDING OUR NAMES)

INDIVIDUAL LETTER 815: UNKNOWN (9)

Response to Comment Ind 815-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 816

Ind 816-1

I'm not providing my name as I am concerned about reprocussions as the LLC. has blocked me & deleted my comments/questions on socialmeadia as it is. I worked commerical const for over 25 yrs & my eduation is in architure & encrgy mgt, where I learned to read & write EIRS.

My questions are as follows:

Ind 816-2

1. What is back up & back up to the back up Plan given extended power outages that we in the community are susceptible to. Some of these are "acts of god" creating the concern that WHEN things go awry & on/under treated water hits local surface watershed & creeks etc. No leagal responsibilty

Ind 816-3

2. After 2 yrs of 174 const (which Im not sure wasn't lobbied for by the interests of th LLC.) the trucks on road are felt & heard in the homes. This, over 500% increase in truck traffic, is not acceptable.

Ind 816-4

3. There is no reason why exact equip to be used could not have been used in the study re: noise & emmissions rather the "typical" or "potential"

Ind 816-5

4. Just as no one knows exactly where the gold is, noone knows exactly how the fisures & aquifers are connected. My current well is 900' deep. If NID is already "waterbound" The drought is getting more extreme & avg precipitation trend decreases in the last 100 yrs that's the precise plan to deal w/

Ind 816-6

with this? water reclamation? How can the L.L.C. not pay for useage as well as infrastructure to the known locations where water will be lost.

In closing, please keep in mind boundary capacity & this is a LIMITED LIABILITY CORP.

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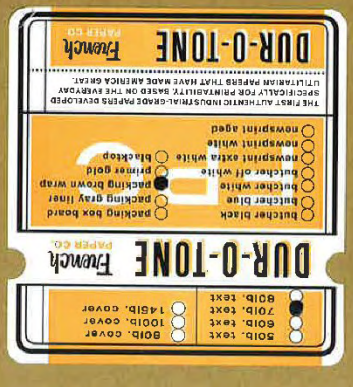
MAR 24 2022
NEVADA COUNTY
PLANNING DEPARTMENT



INDIVIDUAL LETTER 816: UNKNOWN (10)

Response to Comment Ind 816-1
The comment is an introductory statement and does not address the adequacy of the DEIR.

Response to Comment Ind 816-2
Please refer to Chapter 4.11, Public Services and Utilities, for information related to electricity supply, and Chapter 4.8, Hydrology and Water Quality, for information related to surface water quality. Please also see Master Response 35 – Discharge to South Fork Wolf Creek.

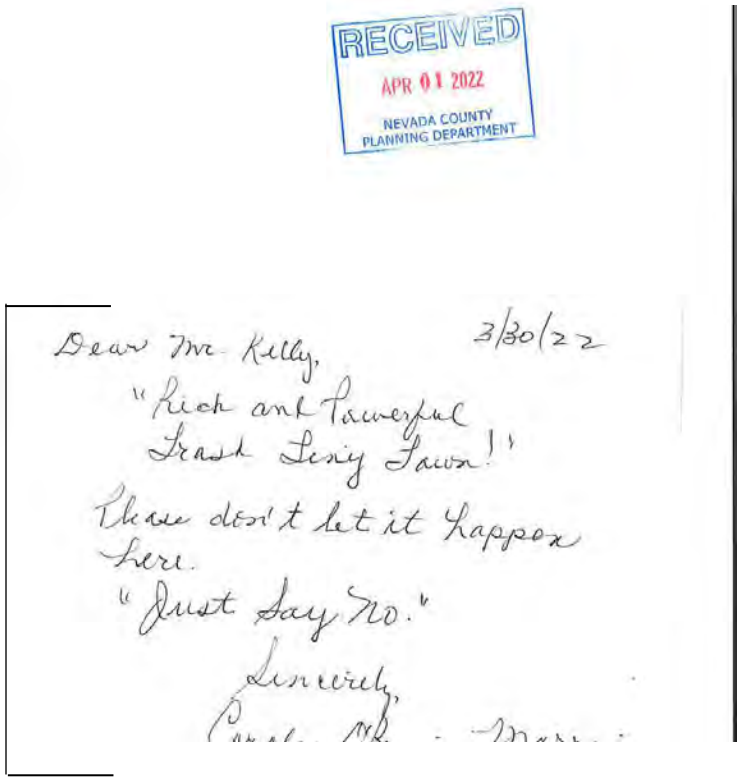
Response to Comment Ind 816-3
The comment appears to pertain to construction along SR 174 which is not related to the proposed project. Please see Chapter 4.12, Transportation, for additional information related to impacts associated with truck traffic. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 816-4
The modeling conducted for the air quality and noise analyses was done using reasonable assumptions, which is adequate under CEQA. Engineering level detail, such as actual brands of equipment, is not required in an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 816-5
Please refer to Master Response 7 – Location of Future Mining Areas. Additionally, regarding water well and drought concerns, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 16, which relates to drought conditions.

Response to Comment Ind 816-6
The comment does not address the adequacy of the DEIR. The comments have been noted for the record and forwarded to the decision-makers for their consideration.

Individual Letter 817



RECEIVED
APR 01 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Ind 817-1

3/30/22

Dear Mr. Kelly,

"Rich and Powerful
Trash Tiny Town!"

Please don't let it happen here.

"Just Say No."

Sincerely,

Chapter 2 – Responses to Comments
Page 2-8010

INDIVIDUAL LETTER 817: UNKNOWN (11)

Response to Comment Ind 817-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition to the proposed project. The comment has been noted for the record and forwarded to decision-makers for their consideration.

Individual Letter 818

From: Uta Reimnitz
To: Idaho MMEIR
Subject: Mine comment 2:45pm
Date: Friday, March 4, 2022 2:53:22 PM

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To whom it may concern,

I am a single mother to a young son, and a homeowner off of Burma, less than a mile away from the proposed mine site, I am strongly AGAINST the mine going in! My house water supply comes from my well, and my irrigation water from the NID ditch above my home, and I am concerned not only about the quantity of water that I will have, but also the quality. I know the claim by Rise is that our supplies will not be affected, but I don't believe it. It takes huge amounts of water for this sort of operation, and it would without a doubt suck from our groundwater table. I is impossible to think that sucking out huge amounts of water would not lower our groundwater. I am dipping into my savings every month as it is, and if my well runs dry, I will not have the money to purchase water from anywhere else. Flat out I am not in a position to purchase water.

Ind 818-1

The claim by the mine operation is also that it will not add to the pollution of our environment or our water. This is also a flat out lie. I am concerned about the amount of new traffic that a mine production would create, the noise and air pollution that comes with this. Each year the traffic in our area gets worse, and that is not what I moved here for 6 years ago. I chose this small community for a quiet, peaceful lifestyle. I don't want to hear big trucks or additional traffic on Brunswick, the road that runs by my house. I also don't want to be stuck behind more traffic, road blocks during construction, and overall traffic that bringing in more people and industry will do.

Ind 818-2

I am also concerned about what disturbing the water in the process of reopening the mine will release into our groundwater and subsequently into our wells and irrigation ditches, water which we use to grow food that we eat. Not to mention what additional chemicals will be released from the mining process. Disturbing the water will release chemicals from the previous mining days of this area without a doubt. I hear about the effects of small-scale disturbances of the water all of the time, and a big scale operation would disturb the water in a huge way, releasing old sedentary toxins, and be devastating to the safety of our water, wildlife and environment!

Ind 818-3

The claim is that the mine would create jobs for the local economy, but the amount of well-

Ind 818-4

paying jobs is miniscule in comparison to the risks and assault on our community by an outside company, with ties even outside of our own country. Why should we allow a foreign company to take our resources and endanger the people of our community's health and well-being? All for financial gain for them??? Or would the gain also be for our lawmakers?

We need to stick together as a community and not allow this atrocious idea and plan to manifest. I feel that if the local government allows this to happen, it must be in their own best interest for financial gain, and I truly hope that they would now allow this to happen to their people. We would go down in the history books as another Flint water crisis, and I don't want this to happen. Please do NOT allow this to happen, in the name of our community, our environment and our children.

Thank you.
Uta Reimnitz
415-244-1546

Ind 818-5

INDIVIDUAL LETTER 818: UTA REIMNITZ

Response to Comment Ind 818-1

The commenter's general opposition to the project is noted for the decisionmakers. The commenter is referred Master Response 1 - Non-EIR/Administrative Issues. The commenter also states that the project will diminish the quantity and quality of water from the private well on the commenter's property, but does not explain how the DEIR is inadequate in this regard. The DEIR found that the project's impacts to water quality and groundwater supplies would be less than significant. (DEIR, Section 4.8-41, 54.) The commenter is referred to Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Ind 818-2

The commenter states that the project will pollute water resources near the project. Because of the comment's similarity to Comment Ind 818-3, the commenter is referred to Response to Comment Ind 818-3 regarding water pollution. The commenter is also concerned about the project's traffic-related impacts. Chapter 4.12 of DEIR concluded that all traffic-related impacts would be less than significant after mitigation, with the exception of the intersection of SR 174/Brunswick Road (level of service impact) and Brunswick Road/Sutton Way (queueing impact). (see generally DEIR, Chapter 4.12.)

Response to Comment Ind 818-3

The commenter states that the project would result in disturbances and pollution of water. The commenter also state that additional chemicals would be released due to the mining process. The commenter is referred to Chapter 4.8 of the DEIR (Hydrology and Water Quality), Master Response 8 - Mine Waste Characterization, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 - Flows in South Fork Wolf Creek. Regarding legacy mining concerns, please see Response to Comment Grp 25-30.

Response to Comment Ind 818-4

The commenter states that the benefits of increased employment from the project are outweighed by the risks of a "foreign company." The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 818-5

The commenter's opposition to the project is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 819

I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying careers with an average expected annual earnings of more than $122,000 including benefits. The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

Name(s) V. Kuch

Address 10350 Smith Rd ZIP

Phone Grass Valley 95949

Email Address Vkeeni KB@sbcglobal.net

Please DO NOT Support the mine reopening.

Dist 3

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FEB 25 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

Ind 819-1

RISE GRASS VALLEY

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RISE GRASS VALLEY INC
PO BOX 271
GRASS VALLEY CA 95945-9801

INDIVIDUAL LETTER 819: VALERIA KACH

Response to Comment Ind 819-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 820

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APR 04 2022
NEVADA COUNTY
COMMUNITY DEVELOPMENT

Response to RISE DEIR concerning fire and wildfire.

I am a resident of Nevada County. I am particularly interested in Rise's plans to reduce the risk of fire and to fight it should one develop. I have spent a great deal of time getting my own property cleared of ladder fuel, thinned removing many trees, and working with neighbors to create a safer boundary between properties. I have a son who is a career firefighter in this area.

Ind 820-1

Fire and Wildfire is a focused concern I have and find the DEIR inadequate in addressing the issues. The report seems to let other agencies "shoulder the load" for these two related areas of concern. The responsibility is put upon the surrounding fire departments, NIDs water lines, PGE's maintenance of power lines. Rise is limited itself to following types of compliance: adhering to building codes that include fire risk reduction materials and sprinklers and having an emergency EMT crew on trained and on-hand. Rise will also follow a vegetation plan to reduce ladder fuels and remove some of the forested area on the properties. (pdf page 986). This is no more than many to most neighbors are doing. The critical difference being: the neighbors aren't bringing in explosives and detonators, they aren't storing large quantities of diesel fuel in 12,000 gallon tanks above ground (pdf page 992), they aren't located at a major evacuation intersection for one of the largest neighbor hoods in the Grass Valley area. These and other concerns make the re-opening of the mine very risky.

Ind 820-2

The DEIR reported that there are several fuel reduction programs going on. I know the Office of Emergency Services (OES) has been active in cutting breaks and sponsoring the Green Waste Drop Off through their organization with grants and currently staffing the County sponsored drop off. One of the proposed projects identified in the DEIR was to be on Greenhorn, East of Bennett. (FYI - all of Greenhorn is east of Bennett.) As a side note, it is interesting that Rise has provided that space and I am appreciative of the temporary use of the Brunswick site for this propose. At the same time, I wonder why Rise personnel aren't out reducing ladder fuels on their own property. There are substantial amounts of scotch broom, dense trees that need to be thinned, downed and broken trees scattered across the property I can see from my car. I understand that this will be addressed in the vegetation plan if and when the mine is approved, but right now is the beginning of the 2022 fire season. Being a good neighbor NOW would demonstrate a commitment to the region very different from future promises to do the same.

Ind 820-3

The DEIR cites several nearby fuel reduction projects but the 2 that got my attention were:

> "With respect to planned but not yet funded fuel treatment projects in the immediate vicinity (i.e., grant application submitted but award not yet confirmed), the primary project is roadside vegetation management (to create defensible space) along East Bennett Road, where the potable water pipeline would be installed, as well as the portion of Brunswick Road along the frontage of the Brunswick Industrial Site. Similar roadside vegetation management is also proposed along Greenhorn Road, east of the Brunswick Industrial Site." (pdf page 973).

I was curious which came first - the need to clear vegetation to install the new NID pipe along Bennett or the need to reduce the fire fuels near where trucks carrying explosives will travel.

Either way reducing the fuel load along these 2 roads is important. The Greenhorn project I wondered about. Vickie Deam, the Greenhorn Firewise Community leader, knew nothing about a proposed project. She noted that the county crew came in a year or so ago and walked Greenhorn to cut back right-of-way fuels and used heavy equipment to clear taller vegetation and trees as needed. The neighborhoods have done a tremendous job of clearing, thinning and opening up the properties, at least as far as I drive a couple of miles up Greenhorn. I know of several neighborhoods who live on side streets from Greenhorn collectively clearing road right-of-ways to allow better clearance for emergency vehicles. The person at FireSafe Council spoken with didn't know of any proposed projects but would check further. The same was true of Office of Emergency Services, waiting on a call back. Where did the DEIR authors find information on this proposed project? Who is proposing it and what grant agency would consider it?

The section on Topography and Vegetation (pdf page 971) is not adequate. Once again, Rise considers their narrow scope of needs at the expense of seeing the bigger picture immediately outside the above ground site boundaries but still inside the mineral boundary. The report says there are "no significant slopes such as those in steep-walled canyons or mountainous valleys" nearby. Slopes are an important factor in fires as fires burn upslope, with the heat rising drying the flammable materials/vegetation located above the advancing fire. Rise's DEIR dismisses the upward burn of fires because steep slopes occur over 3 miles from the Brunswick site. What the authors failed to do was walk around the site and see that much of the proposed mine buildings above ground are in one of the lowest area. Hills rise in most directions and Banner Mountain rising a further NE from the Brunswick site.

Ind 820-4

According the elevation measurements on ***Google Earth*** the mine shaft estimated location is 2761 feet in elevation. The houses selected are random to represent different directions from the Brunswick site.

General area Location	Elevation	General Direction from site
Mine shaft	2761 ft.	On Brunswick site
Mine pond	2716 ft.	On Brunswick site
Intersection Bennett/Brunswick	2817 ft.	North East -adjoining Brunswick site
12171 Brunswick	2851 ft.	North across the street from site
14278 LaNoria	2911 ft.	West
11144 Cedar Ridge	2975 ft.	South (slightly east)
Y intersection 174 & Brunswick	2864 ft.	South (slightly west)
Airport runway	3070 ft. to 3154 ft.	Northeast

The change of elevation ranges (from the existing shaft) from about a 50-foot rise to about 300 at the airport. Just because these are not steep slopes, they will still have fire burn rapidly up the hill sides affecting fire behavior. The possibility of this happening is real as the region is classified as ***Very High Fire Hazard Severity Zone***.

Ind 820-5

Rise commits to having diesel trucks to cease their delivery trips and/or pull off the road in the case of an emergency. Driving Brunswick, Bennett, and Crown Point/Centennial often there aren't a lot of places to pull off with a truck that large.

Ind 820-6

The worst-case scenario of a fire starting on the Brunswick site is a possibility as explosives are delivered and stores prior to use, 2 large diesel fuel storage tanks will be above ground, the increased diesel trucks on the road increases the likely hood of an accident that could spark a fire. The current plan calls for Cal Fire to respond from Ridge Road. The current plan also is to have sprinklers and a 30 and 100 foot defensible space around buildings helps those on site. Vegetation management will eventually help reduce a fire from spreading up the hill. But light winds and embers carried across roads will spread the fire to nearby neighbors and beyond.

Ind 820-7

What else will Rise do to address this? It is generous that they are donating a firetruck and the FTE for 3 more firefighters but fighting fires on Greenhorn is a huge concern. The NID supplied water ends just over 1 mile from Brunswick, everyone else is on wells. Currently a fire out on Greenhorn involves tanker trucks delivering water and returning to the hydrant near Brunswick, filling up and going back to the fire event. This might be a 45-minute round trip depending on the fire location. Some homes have storage tanks but having talked to firefighters who say that these may not be safe as the years of build-up in the tanks could ruin a pump filter, eliminating the use of the equipment. If in doubt, the stored water would not be used. Greenhorn is the main evacuation route for about 1200 people or more. (In 2021 Greenhorn FireWise Community mailed 787 letters to addresses associated with Greenhorn or roads that adjoin it. In 2021 FireSafe estimated 748 parcels with 598 of them improved. Estimate 2 people per home 600 x 2 = 1200 a conservative estimate) Brunswick is a "secondary evacuation route". It carries a significant traffic each day and in an emergency this road would be primary way out of town as smaller collector streets fed into it and then into Highway 174. A fire blockage at the Brunswick/Greenhorn would be a disaster. But most residents would leave using Greenhorn and emergency equipment would use Greenhorn to reach the fire to fight it. (Note 2 other Greenhorn evacuation routes: a one lane road exit on Lost Lake goes to You-Bet and then to highway 174. A second route winds up Greenhorn to Banner Lava Cap area where others living there would also be trying to evacuate.) If the fire spread it could impact the ability to use the resources at the nearby Air Attack Base located at the airport, which could affect the entire region's firefighting response.

Ind 820-8

What could Rise do to reduce the fire risk? One suggestion is to follow the lead of the Greenhorn FireWise Community's collaboration with the Joint Fire District working to install two 20,000-gallon water tanks at intervals along Greenhorn for fighting wildfires. Rise could install one or two 20,000-gallon water tanks dedicated to fire fighting on their Brunswick and Centennial sites. They would be located for easy access by fire department. This is one way to address a worst-case scenario and helps meet the Nevada County General Plan Policy EP-10.1.4 about adequate evacuation routes. It also supports policy EP-10.1.11 to *incorporate appropriate fuel modification around development and emergency ingress and egress for residents, visitors and emergency services*. For Rise this would be for mine operation workers and residents in the mineral boundary near the Brunswick and Centennial sites. Policy FP-10.8.4 supports *new development include adequate emergency infrastructure that includes but*

not limited to emergency water facilities, ingress/egress routes to facilitate evacuation of residents and maintain them. This would be pro-active on Rise's part instead of primarily depending on local agencies to provide services and respond when needed.
DEIR states:

> "In the unlikely event of a vegetation fire at either the Centennial or Brunswick Industrial Sites, resulting from on-site project operations, CAL FIRE would respond out of Station located at 10242 Ridge Road, Nevada City" Page 4.13-21

What other ideas has Rise developed to deal with the development of worst-case fire disaster at the mine that would likely spread into nearby homes and beyond. Without planning to "protect" the Brunswick and Bennett/Greenhorn intersection in an emergency situation possibly stemming from a mine accident, then concern **4.13-1** is **more than significant.** Not having some type of additional "protection" could "substantially impair an emergency response or evacuation".

Ind 820-9

Rise needs to be more comprehensive in not only following codes but also planning for more options to prevent and fight fires in the immediate mineral boundary area not just on their building sites. What water service can it provide to the providers? What can be done to secure more of the 2585 acres in the mineral boundary? What can be done if the NID's water lines were damaged? How would fire be addressed then?

Respectfully,



Victoria Rubiales
11371 Marjon Drive
Nevada City, CA 95959

INDIVIDUAL LETTER 820: VICTORIA RUBIALES

Response to Comment Ind 820-1

The commenter states that the DEIR's Wildfire chapter is inadequate (Chapter 4.13) because the Project Applicant is not undertaking enough measures to mitigate wildfire risk. The commenter states that the Project Applicant's implementing measures such as adhering California Building Code standards, implementing a vegetation management plan, or training an on-site EMT crew is insufficient. The commenter also states that certain project characteristics exacerbate the risk of wildfire, such as the transport of explosives, the storage of diesel fuel, and that the Brunswick Industrial Site sits at an intersection used for evacuation by a large neighborhood.

However, the commenter does not explain how the DEIR fails to address these project components in the context of wildfire impacts. For example, the DEIR states that the project would have a less than significant impact on substantially impairing an emergency response or evacuation plan because in the event of an evacuation, the Idaho-Maryland Mine operator would be instructed to cease all trucking operations. (DEIR, p. 4.13-17.) The installation of two, 12,000-gallon above-ground diesel fuel storage tanks would be located away from vegetation in the industrial complex building area and, as a Class II liquid, would be regulated in accordance with the California Fire Code (CFC). This CFC requires robust design requirements to minimize fire hazard to the maximum extent feasible, including but not limited to requirements for overfill protection, spill containment, and dispenser emergency shutoff valve. (DEIR, p. 4.13-24.) The DEIR also states that the transport, storage, and use of explosives for underground mining has an excellent safety record as it is highly regulated at all levels of government (e.g., federal, state, and local). (DEIR, p. 4.7-23–28.)

Lastly, the commenter does not identify what mitigation measures the DEIR would need to include to render the project safe from a wildfire perspective.

Response to Comment Ind 820-2

The commenter states that the Project Applicant should be reducing ladder fuels on the Brunswick Industrial Site currently now rather than waiting for certification of the DEIR and project approval. This comment does not address the adequacy of the DEIR. The comment is noted for the decisionmakers. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 820-3

The commenter asks whether a fuel treatment effort along East Bennet Road would occur because of the need to install the water pipeline or the need to reduce fire fuels where explosives will be transported. The project does not propose to remove vegetation for the transport of explosives. Moreover, the project does not propose to conduct fuel treatment along East Bennett Road and installation of the potable water pipeline is separate from fuel treatment efforts. The commenter also asks where the DEIR learned of the fuel treatment effort along Greenhorn Road. Data for fuel treatment efforts is sourced from the Yuba Forest Network Stakeholder Mapping Project, which is led by the South Yuba River Citizens League's (SYRCL) Yuba Forest Network in collaboration with the County of Nevada Office of Emergency Services. (DEIR, p. 4.13-5, fn. 3.)

Response to Comment Ind 820-4

The commenter states that the DEIR is inadequate with respect to the description of topography and vegetation of the Brunswick Industrial Site because of the low elevation of structures on the Brunswick Industrial Site. However, the DEIR addresses this on page 4.13-22, noting that the

incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Mitigation Measure 4.13-2, which includes a vegetation management plan, would reduce this risk to less than significant. Nevertheless, the DEIR remains accurate in stating that those topographical characteristics and features that exacerbate wildfire risk (e.g., steep-walled canyons) are not as prevalent on-site as they are in other regions in Nevada County.

Response to Comment Ind 820-5

The commenter states that the certain roads used by project trucks are too narrow for trucks to pull off of the side of the road in the event of an emergency or evacuation. The commenter is referred to Master Response 5 - Evacuation Zones.

Response to Comment Ind 820-6

The commenter states that because of the transport and storage of explosives to the Brunswick Industrial Site and the installation of two diesel fuel storage tanks, a fire may start at the project site. This comment does not address the adequacy of the DEIR. CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." As already discussed (820-1), transport of explosives and design of above-ground diesel storage tanks are both highly regulated by the government.

Response to Comment Ind 820-7

The commenter provides a narrative on fire safety in the Greenhorn Road area, but does not provide a comment on the adequacy of the DEIR. Please see Master Response 5 – Evacuation Zones.

Response to Comment Ind 820-8

The commenter states that the Project Applicant should install large water tanks at the project sites to mitigate fire risk. However, the DEIR's Chapter 4.13 (Wildfire) already determined that wildfire impacts are less than significant after mitigation. As stated on page 4.13-22 of the DEIR, the Centennial and Brunswick Industrial Sites have limited steeply-sloping topography that is known to exacerbate wildfire risk and spread. Prevailing wind conditions within the surrounding area are from the North-East and South-West directions, both of which have forest lands. The incorporation of defensible space around proposed structures at the Brunswick Industrial Site, as well as designing buildings in conformance with Chapter 7A of the CBC, would help to slow the spread of wildfire moving through the area. In addition, proposed improvements at both Sites would reduce the vegetation fuel load in the area. Nevertheless, vegetation would remain on both Sites and would need to be managed on an ongoing basis. In addition, use of hydrocarbon-powered heavy-equipment on-site could exacerbate wildfire risk. Without implementation of a vegetation management plan, the project could have a significant impact related to exacerbating wildfire risks, and thereby exposing project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Implementation of the Mitigation Measure 4.13-2 would reduce the above potential impact to a less-than-significant level.

The commenter asks what the Project Applicant could do to reduce fire risk. As stated on page 4.13-20, two existing fire service lines extend into the Brunswick site. The project also generates approximately 850 gallons per minute of groundwater which is treated and could be available for additional water needs if required. As discussed on page 4.11-25 of the DEIR, the mine's own rescue team, which would total 24 members and include five EMTs, would be on call to respond to emergencies. Pursuant to MSHA, a minimum of two teams is required to be available within a one-hour travel time to respond to the mine site. The mine rescue teams would be fully trained and equipped with personal protective equipment, closed circuit rebreather apparatus for underground, open circuit self-contained breathing apparatus for surface responses, oxygen and equipment supplies, gas testing equipment, thermal imaging cameras, communication devices, fire fighting vehicles, hand tools, pumps, hoses, and other equipment. All equipment would be kept at the Brunswick Industrial Site and would not require expansion or new emergency response facilities.

Response to Comment Ind 820-9

The commenter states that the Project Applicant needs to include more measures to address wildfire risk. However, the DEIR has already determined that wildfire impacts are less than significant after mitigation. The commenter is referred to Chapter 4.13 (Wildfire) and the above response.

Individual Letter 821

From: Virginia Moran <vsm@ecooutreachvsm.com>
Sent: Saturday, March 26, 2022 3:57 PM
To: Idaho MMEIR
Subject: Comment on the Mine

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Ind 821-1

Opposed.

Virginia Moran, 20 year resident/Biologist

INDIVIDUAL LETTER 821: VIRGINIA MORAN

Response to Comment Ind 821-1

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 822

From: Wade Laughter <wade@houseofharlequin.com>
Sent: Monday, April 4, 2022 3:06 PM
To: Idaho MMEIR
Subject: Objection to the DEIR and the mine

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Ind 822-1

It should be very clear to anyone who reads the DEIR that the data and suggested mitigations are at the least heavily slanted in favor of the organization that paid for the DEIR. As it should be, they paid for it.

However, the issue is of interest to those of us for whom this is our home and our community. We have invested our life and families here. It is not about the money to be made. All of the effects described in the DEIR and the talk of mitigating those effects gloss over the central question. The question is "Why do we want or need this mine in our community?" All of the problems inflicted on this community so a canadian company can take the profits of their mine elsewhere. It would be different if this project added some benefit to our community like growing food or generating electricity with no greenhouse gas emissions. But instead we are promised a handful of dangerous jobs and many negative environmental impacts.

The team of folk from RiseGold have a poor record for obeying local rules and cleaning up after their work is no longer profitable. How can we, the taxpayers and voters of Nevada County trust this company to do right here? In looking at other mines around the world it is extremely rare to find a mine so close and uphill from a city like Grass Valley. It is even more rare to find a mine operator that is environmentally responsible and a good neighbor to the community it operates in. Why should we trust this company to treat our community fairly?

I respectfully ask that our county deem the DEIR insufficient in its findings and deny the permit to reopen the Idaho Maryland mine. It is only a benefit to a few people and the hazards and potential problems are a concern to everyone who lives here because we love this place and the community we are creating.

Wade Laughter, district 1 voter, taxpayer and community member for life.

INDIVIDUAL LETTER 822: WADE LAUGHTER

Response to Comment Ind 822-1

The commenter suggests that the DEIR is biased because it was paid for by the Project Applicant and based on their information. The CEQA Guidelines allow a Project Applicant to prepare a DEIR as long as the lead agency, in this case Nevada County, independently reviews the DEIR. (14 CCR 10584(d)(3); (e).) Not only did the County independently peer review the information provided by the applicant, but the County hired Raney Planning and Management to prepare the DEIR. Please see Master Response 1 and Master Response 3. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 823

From: Joan Staffen
To: bdofsupervisors
Subject: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report
Date: Wednesday, March 2, 2022 12:51:10 PM

Dist 3

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General Comments on the Idaho-Maryland Goldmine Opportunity in Nevada Enterprise, IMgone, project EIR

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

Ind 823-1

Even before reading the subject, EIR most will conclude that for the city planners to even consider reviving a mining project in Grass Valley is on its face strange and repugnant. Strange because to open such an ecologically, economically, community, culturally, and socially disruptive business tortures common sense. Repugnant because it makes no business logic from any position, save the one where proponents raise money, enrich themselves and then flee the country, leaving investors and the people of Grass Valley to clean up the enormous damage and irreparable harm.

Ind 823-2

This exact scenario played out on a much small scale, in Canada where Rise Gold first conceived this practice and was a dress rehearsal for IMgone. Just the act of a town council entertaining this predatory business practice substantially legitimizes a fraud parading around as a corporate mining business. A costly court cause of action for an injunction is looming, and not only on the EIR process but on Riser Gold as well. It is well known that Rise Gold is undercapitalized and that a common red flag for this kind of scheme. County money should be spent seriously investigating Riser Gold and the proponents of IMgone. Where are the hundreds of $millions to re-open Chernobyl going to come from and the $Billions to close Pandora's box once re-opened?

Ind 823-3

Perhaps the city council should take a field trip to any of the public gold mine parks for a look into the past. Historically the gold mining operations in Nevada County controlled and affected everything and everyone in the community, which served the mine mostly to enrich a few owners. Nothing wrong with that, it's the capitalist way. But look what was done to the environment, the permanent damage to the rivers and streams, to fish, wildlife, and humans which now must live with mercury poisoning and other toxins.

Ind 823-4

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

Ind 823-5

But today one needs to consider issues such as large regional wildfires burning toxic materials used and stored at the mine, climate changes creating challenges to energy uses and power outages, fire ignition and control, mass population evacuations, contaminated wells, and surface waters, hazardous waste disposal, toxicity to the environment and containment, much-reduced groundwater and water supplies from all sources, population density increases, regulatory requirements, etc etc.

Ind 823-6

It would seem that our city council has swallowed this "opportunity" and directed an EIR to be made to legitimize the IMgone project. The IMgone EIR reads like a high school report, liberally sprinkling general policy and motherhood statements from various public agencies, drawing sweeping economic issues under the "volunteer cleanup" action, playing a corporate entity separation game to disable chain of liability to get under regulatory controls and the most egregious violation is the absence of any real cost analysis for any of the worst-case scenarios that must be addressed.

Ind 823-7

To be fair, to even think for one second that an EIR will or even can address all of the issues is absurd. The attempt, if not such a serious breach of public trust and threat to the community, would otherwise be laughable. This entire IMgone business scheme for a few "high paying" community jobs? Absurd. See above the potential damages and costs. They are insurmountable as they are permanent. Workers are hired and fired without recourse. What body of authority can seriously claim that this mining resumption has some economic benefits over and above the costs? It has scam written all over it, any fool can see that. This is not rocket science, it is plain. The mines were no longer profitable 50+ years ago and at a time when hardly any of the true costs were addressed in the economics calculation. Today, we know the costs and they are magnitudes greater than they were.

Ind 823-8

In short, we would be sacrificing our water, land, air, community, way of life, ecological systems, and for what? Some gold for some stupid-money investors and con men? There isn't enough gold in the entire US that can pay for this potential Chernobyl and EPA superfund site. Explaining the IMgone EIR in terms of EL5, economically even cursory count fingers analysis would quickly show IMgone is a fraud and undercapitalized Rise Gold at best incompetent at rudimentary arithmetic and at worst a scam orders of magnitude larger than their Canadian precursor. The only jobs created by IMgone are the city and county government jobs to evaluate an investment con dressed up as a legitimate corporate mining enterprise. We the citizens will remember how our tax money was spent and how quickly our city leaders forget the gold mine reopening debacle in San Juan just a few miles north and a few years back. If it looks like a scam, smells like a scam, and quacks like a scam, it's probably a scam. To quote a Noble Prize winner, "you don't need a weatherman to know which what the wind blows", just like we don't need an EIR to know IMgone is a scam.

Ind 823-9

Sincerely,

Walt Froloff

516 Temby St.

Grass Valley, CA 95945

walt@patentalchemy.com

INDIVIDUAL LETTER 823: WALT FROLOFF (1)

Response to Comment Ind 823-1

The commenter expresses dislike of the project and states that it would only economically benefit the Project Applicant while causing harmful environmental impacts to the community. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-2

The commenter references the Project Applicant's CEO and his past business dealings in Canada. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues, and Master Response 3 - Operator Responsibility. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-3

The commenter describes environmental damage caused by historic gold mining in California. The comment is noted for the decisionmakers. The commenter is referred to DEIR Chapter 4.8 Hydrology and Water Quality for a description of the existing water quality conditions in the project area and an evaluation of the proposed project's potential impacts on water quality. The comment does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-4

The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market. The commenter further describes historic gold mining operations. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-5

The commenter generally alludes to a variety of environmental impacts that should be considered. The DEIR addresses each of the issues listed in this comment in the appropriate sections (see DEIR Chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy; 4.7 Hazards and Hazardous Materials; 4.8 Hydrology and Water Quality; 4.9 Land Use and Population and Housing; and 4.13 Wildfire). The commenter does not provide any specific comments that address the adequacy of the DEIR, and no further comment is warranted.

Response to Comment Ind 823-6

The commenter takes issue with the adequacy of the DEIR but does not provide any specific details. The commenter refers to the "city council" while the land use authority for the project is the County. The commenter asks for analysis of worst-case scenarios; however, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not provide any specific comments to which a response can be made.

Response to Comment Ind 823-7

The commenter asserts that the DEIR fails to address all of the possible impacts from the project, but does not specifically identify why the DEIR is inadequate. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The commenter's opposition to the project is noted for the decisionmakers.

Response to Comment Ind 823-8

The commenter generally states that the economic benefits would accrue to the Project Applicant while the community would suffer harmful environmental impacts. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. As a point of correction, the project would not be located on an EPA superfund site. The Centennial Site has never been on the National Priorities List[5] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[6].

The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

Response to Comment Ind 823-9

The commenter states that the only jobs created by the project would be government jobs and reiterates his general opposition to the project. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. The comment is noted for the decisionmakers but does not address the adequacy of the DEIR and does not warrant further response.

[5] https://www.epa.gov/superfund/superfund-national-priorities-list-npl
[6] https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi

Individual Letter 824

Dist 3 RECEIVED

MAR 08 2022

NEVADA COUNTY
BOARD OF SUPERVISORS

March 1st, 2022

Nevada County Board of Supervisors
950 Maidu Avenue, Suite 200
Nevada City, CA, 95959

Dear Supervisors Heidi Hall, Ed Scofield, Dan Miller, Susan Hoek, and Hardy Bullock,

General Comments on the **I**daho-**M**aryland **G**oldmine **O**pportunity in **N**evada **E**nterprise, IMgone, project EIR

Even before reading the subject, EIR most will conclude that for the city planners to even consider reviving a mining project in Grass Valley is on its face strange and repugnant. Strange because to open such an ecologically, economically, community, culturally, and socially disruptive business tortures common sense. Repugnant because it makes no business logic from any position, save the one where proponents raise money, enrich themselves and then flee the country, leaving investors and the people of Grass Valley to clean up the enormous damage and irreparable harm.

Ind 824-1

This exact scenario played out on a much small scale, in Canada where Rise Gold first conceived this practice and was a dress rehearsal for IMgone. Just the act of a town council entertaining this predatory business practice substantially legitimizes a fraud parading around as a corporate mining business. A costly court cause of action for an injunction is looming, and not only on the EIR process but on Riser Gold as well. It is well known that Rise Gold is undercapitalized and that a common red flag for this kind of scheme. County money should be spent seriously investigating Riser Gold and the proponents of IMgone. Where are the hundreds of $millions to re-open Chernobyl going to come from and the $Billions to close Pandora's box once re-opened?

Perhaps the city council should take a field trip to any of the public gold mine parks for a look into the past. Historically the gold mining operations in Nevada County controlled and affected everything and everyone in the community, which served the mine mostly to enrich a few owners. Nothing wrong with that, it's the capitalist way. But look what was done to the environment, the permanent damage to the rivers and streams, to fish, wildlife, and humans which now must live with mercury poisoning and other toxins.

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

But today one needs to consider issues such as large regional wildfires burning toxic materials used and stored at the mine, climate changes creating challenges to energy uses and power outages, fire ignition and control, mass population evacuations, contaminated wells, and surface waters, hazardous waste disposal, toxicity to the environment and containment, much-reduced

groundwater and water supplies from all sources, population density increases, regulatory requirements, etc etc.

It would seem that our city council has swallowed this "opportunity" and directed an EIR to be made to legitimize the IMgone project. The IMgone EIR reads like a high school report, liberally sprinkling general policy and motherhood statements from various public agencies, drawing sweeping economic issues under the "volunteer cleanup" action, playing a corporate entity separation game to disable chain of liability to get under regulatory controls and the most egregious violation is the absence of any real cost analysis for any of the worst-case scenarios that must be addressed.

To be fair, to even think for one second that an EIR will or even can address all of the issues is absurd. The attempt, if not such a serious breach of public trust and threat to the community, would otherwise be laughable. This entire IMgone business scheme for a few "high paying" community jobs? Absurd. See above the potential damages and costs. They are insurmountable as they are permanent. Workers are hired and fired without recourse. What body of authority can seriously claim that this mining resumption has some economic benefits over and above the costs? It has scam written all over it, any fool can see that. This is not rocket science, it is plain. The mines were no longer profitable 50+ years ago and at a time when hardly any of the true costs were addressed in the economics calculation. Today, we know the costs and they are magnitudes greater than they were.

In short, we would be sacrificing our water, land, air, community, way of life, ecological systems, and for what? Some gold for some stupid-money investors and con men? There isn't enough gold in the entire US that can pay for this potential Chernobyl and EPA superfund site. Explaining the IMgone EIR in terms of EL5, economically even cursory count fingers analysis would quickly show IMgone is a fraud and undercapitalized Rise Gold at best incompetent at rudimentary arithmetic and at worst a scam orders of magnitude larger than their Canadian precursor. The only jobs created by IMgone are the city and county government jobs to evaluate an investment con dressed up as a legitimate corporate mining enterprise. We the citizens will remember how our tax money was spent and how quickly our city leaders forget the gold mine reopening debacle in San Juan just a few miles north and a few years back. If it looks like a scam, smells like a scam, and quacks like a scam, it's probably a scam. To quote a Noble Prize winner, "you don't need a weatherman to know which what the wind blows", just like we don't need an EIR to know IMgone is a scam.

Sincerely,

Walt Froloff
516 Temby St.
Grass Valley, CA 95945
walt@patentalchemy.com

INDIVIDUAL LETTER 824: WALT FROLOFF (2)

Response to Comment Ind 824-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 825

From: Joan Staffen
To: Idaho MMEIR
Subject: Re: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report
Date: Monday, March 7, 2022 5:25:31 PM

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From: Walt Froloff

To: Matt Kelley, Senior Planner

General Comments on the Idaho-Maryland Goldmine Opportunity in Nevada Enterprise, IMgone, project EIR (Specific comments will follow later.)

Dear Matt,

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Ind 825-1

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live with mercury poisoning and other toxins.

Keep in mind that this happened when the community, environment, and ecology were pristine and regulations were non-existent. Despite the enormity of the damage, the mines were closed down years ago because they became unprofitable. That was when the costs were only considered for the owner's profitability, not the true costs including contaminated soil and water, economic, health, social, cultural, and ecological which have increased several orders of magnitude. Back then you could just take the money and run.

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Sincerely,

Walt Froloff

516 Temby St.

Grass Valley, CA 95945

walt@wxfman@gmail.com

INDIVIDUAL LETTER 825: WALT FROLOFF (3)

Response to Comment Ind 825-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 826

From: Joan Staffen <joanrose1030@gmail.com>
Sent: Wednesday, March 2, 2022 5:04 PM
To: Idaho MMEIR
Subject: Re: Comment on Re-Opening of Idaho-Maryland Mine by Rise Gold & EIR Report

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Ind 826-1

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1

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Sincerely,

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Grass Valley, CA 95945

walt@wxfman@gmail.com

INDIVIDUAL LETTER 826: WALT FROLOFF (4)

Response to Comment Ind 826-1

This letter is a duplicate copy of Individual Letter 823. Please see comments and responses in Individual Letter 823.

Individual Letter 827

Matt Kelley, Senior Planner

Nevada County Planning Department

950 Maidu Avenue, Suite 170

Nevada City, CA 95959-7902

March 23, 2022

email Idaho.MMEIR@co.nevada.ca.us

RE: Specific Comments on the Idaho-Maryland Goldmine SCH# 2020070378 Draft Environmental Impact Report - DEIR

Dear Mr. Kelley,

Ind 827-1

My name is Walt Froloff, and I am a new resident of Grass Valley. I moved here to enjoy the more rural setting and beauty of this area where the quality of life has been preserved up to this point. I was horrified to learn that the city/county authorities are even contemplating this death to a community project. This one project will kill the quality of life here. I don't believe that this DEIR covers this subject in sufficient depth or any understandable way. Some of the conclusions have no reality-based or common-sense conclusions. Some of the analyses, traffic, for example, present an analysis of trivial and unrealistic traffic impact models. For the cancer analysis, no real-world conservative dispersion models are presented and hence the conclusions are garbage, as in GIGO. Reality or realistic design basis scenarios are ignored mostly throughout this DEIR in most of the sections. Some definitions of terms need drastic changes as they are misrepresentative of the data that is provided or they are just insufficient to aid in understanding this catastrophe in the making. Please consider my comments on your DEIR. I would appreciate a response. Thank you.

Walt Froloff
516 Temby St,
Grass Valley, CA 95945

Please find my comments to the immediately preceding DEIR specific references enclosed in the /*WxF: :WxF*/ delimiters

Ind 827-2

Chap 1: page 1 -1CEQA Guidelines Section 15021, public agencies are charged with the duty to avoid or minimize environmental damage where feasible. The public agency must balance a variety of public objectives, including economic, environmental, and social issues.

/*WxF: Obligation to balance public objectives including economic etc appears to be the primary mandate for this EIR. There are shockingly no economics or cost numbers mentioned and therefore this DEIR can never fulfill this mandate because it is a grossly incomplete analysis. The public objectives are at first to do no harm to the community and environment. This is generally

1

shown in financial or economic terms. That means balancing the operation of a mining enterprise in Grass Valley without harming life, environment, or quality of life to the members and community. This report is void of all mitigating measure costs. The implication of mitigating measures as in an economic sense must be shown after and above the damage done to the community and environment from all impacts. Moreover in the subject DEIR the liability and burdened party in the analysis and conclusions are quickly swept under the "acceptable insignificant impacts" label and damages permitted or systematically erased as they have no real costs. These "mitigating measures" appear as general nice things to do. Re-opening a mining industry for a private company in return for some jobs and perpetual significant damage to the environment and surrounding community is **not** simply "unavoidable" and otherwise acceptable at any potentially lethal concentration. These freely given and incomplete "mitigating measures" do not make anything "less than significant". This DEIR "mitigates measures" seems to imply that this is a feasible enterprise, that all possible death or destruction is less than insignificant if the proponent does a few things. How is that even possible? What are the mitigating things to a murder?

This DEIR erroneously concludes that for a few more decibels of noise in a particular area that is greater than currently tolerated seems acceptable with some "mitigating measures". In law, this is called a public nuisance and it is litigable. As explained in engineering terms the noise is measured on a logarithmic scale which makes the numbers even more misleading from the onset. The damage is to people and life, in general, is called noise pollution and a few decibels at 10 times per decimal increase are not insignificant. So, to those engineers counting decibels it may be simple arithmetic, but to those living with the increase in noise, increase in toxins, increase in fish and wildlife death, increase in contamination, increase in traffic, increase in danger from trucks laden with toxic tailings and spreading toxic dust as they traverse the community, etc, these are not additive. But the reality is that all of these qualities of life reducers are synergistically combined and enormously detrimental but unaccounted for in the draft. One doesn't just add insignificant impacts like the cost of groceries for the week. All impacts, less than significant, average significance, somewhat significant, almost significant, annoyingly significant, significant, and unavoidably significant are synergistically combined multipliers of reduced quality of life, environmental, and social impacts. Moreover, the detriment to the quality of life is inflicted on the community in perpetuity, and for what? An unproven unsupported unsustainable short-term corporate profit at best or a scam at worst. :WxF*/

Chapter 2 – Executive Summary Page 2-2

Policy 17.9: Encourage the mining of previously mined land**, if such land still contains economically mineable minerals**, so the land can be reclaimed for alternative uses. As discussed above, this alternative delays how quickly the land can be reclaimed to a condition suitable for an "alternative use" of industrial by extending the construction of the industrial pads on both the Centennial and Brunswick Industrial Sites and extending the overall life of the project.

Ind 827-3

/WxF: "IF SUCH LAND STILL CONTAINS **ECONOMICALLY** MINABLE MINERALS" Since the mines were closed and abandoned because there were **not economically** minable minerals at the time, where environmental standards were non-existent, there can be little doubt that the proponent can NOT show that this has changed, even on paper which they have not done, ie this proposed project **is not economically** feasible and therefore on its face not

2

compliant with Policy 17.9. Has the economics of crushing thousands of tons of rock, extraction by toxic chemicals, recycling most of the toxins (which need only very low concentrations to threaten health), removing residual tainted rock dust by truck all the while polluting the roads and drivers with toxic dust in finding a stabilizing home for 1.6 million tons contaminated with cyanide, mercury gotten cheaper? Please remember that over time these all have gotten enormously more costly. And miraculously the price of gold has escalated faster than any of these previously not considered costs? These enormous costs and a few low-paying jobs, considering the true cost of damaging the environment further? The true cost of recovering from a superfund site at the costs shown as to be paid for all of the old sustained damage and from future damage to the environment? Again, is this truly "economically feasible" with all of the costs? And is there a still sufficient minable mineral to pay for the damage to life and limb, all of the costs listed and considered? It is **not**, or at least on from this DEIR or common sense. This entire phase of an EIR process was unnecessary on its face. The burden of proof is on the proponents to show that this EIR cost is justified, that mining for minerals is economic and it must be undertaken by credible proponents. None of these have been shown, and evidence exists and is common knowledge that the proponent of this project has unclean hands from a previous such project on a smaller scale in Canada. For whatever reason, the proponents of this evil project are treated as if they were a legitimate and successful mining entity capable, not just a noname corp with $2 million that purchased an abandoned gold mine. That's not even the cost of two homes in Nevada County. Can two homeowners that sell their property now afford to re-open a mining business? Does this make any sense? :WxF/

Policy 17.10: Consider the socio-economic impacts associated with proposed mining operations. As discussed below, extending the life of the **project affects the economics and ability to finance the project which may impact the implementation of this project including the number of jobs, sales, property, payroll taxes, and land value.**

Ind 827-4

/WxF: This DEIR is grossly in violation of Policy 17.10, as the "**economics and ability to finance** the project" are not included, and if they were we would not be here, this project would have been thrown out or exposed as a scam. Has the initial fixed cost including the mitigation measures, worst-case design, and emergency scenarios been accounted for, before even an ounce of gold is mined, repairing the environmental damage existing and building the necessary facilities for safe mining, sufficiently funded by the proponent corporation? Or is this going to be another San Juan mining corporate business scheme to sell stock and then abandon stockholders left holding worthless stock when the corporate executive team abandons with their planned exit strategy, with the money raised? Show me the money, show me some realistic requisite costs that will be financed and sustained by a solvent corporation with sufficient insurance for all the failures and damage. This as opposed the most probable outcome to defaulting and bankrupt corporations leaving a giant wholly mess for the taxpayers to clean up. How is this project even remotely feasible under Policy 17.10? Where is the insurance cost for failure to clean up the mess reopened? Can they even be insured?: WxF/

Ind 827-5

Chapter 1 – Introduction Page 1-4

In 2005, the Environmental Protection Agency ("EPA") identified the Centennial Industrial Site as potentially needing some level of environmental remediation due to historic mining operations that occurred before Rise's ownership of the site, and in 2018, the EPA confirmed that environmental remediation was necessary.

Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site.

/WxF: Rise has a conflict of interest in "Voluntary Cleanup". "Voluntary" is not free but implies such in all the hoopla. The fox brought in a friend fox who just volunteered to watch the hen house. Does that seem reasonable? When did we start allowing corporations to self-regulate in the Environmental arena? Why are these "volunteers" not afraid of handling toxic tailings? With all due respect, this is one of the stupidest ideas proposed here. Who is to dictate when cleanup is safe? What happens if the "volunteers" decide to quit? How does a profitable corporation stay solvent by employing "volunteers" for hazardous duties and why aren't these costs part of the economics equation? Where are the cost estimates for all the work required, and not just the "mitigation measures"? After all, this analysis has to show that the proponent can "economically mine minerals". Where are the monitoring agencies going to get funding for all the monitoring and compliance work that they will be doing for those "jobs" and taxes to the community? Since Rise has deemed this a viable investment opportunity, perhaps they are not truly worried about the costs. This can all be an investments scam made to raise money for the corporate owners. The inherent conflict of interest for "volunteering" will dictate when the "cleanup" is sufficient. If the owner's exit strategy is to abandon ship just like they did in their Canada mining enterprise, who will have the burden of cleanup? How does one use the law to extend to the country that they funnel money to and flee to avoid consequences when their corporation defaults? :WxF/

Extensive site investigation, overseen by DTSC, has **identified mill tailings**, waste rock, and affected soil at the site that contain **lead, arsenic, mercury, and other metals at concentrations exceeding** background soil metals concentrations and regulatory benchmark concentrations. Elevated soil metals concentrations present a potential human health risk resulting from routine, long-term exposures, as well as ecological concerns in terms of impacts to plant and animal species

/WxF: The Rise "volunteer" program is a sham and did not solve the problem. The analyis reveals that the lead, arsenic, mercury, and other metals at concentrations exceeding gov't allowable limits are some of the deadliest and hardest to contain even after the "scrubbing" and trucking them to another location introduces all kinds of new and bigger problems, none of which are addressed or costs estimated. These are a greater hazard to health and safety to humans than radioactive waste, as these do not ever decay, but stay deadly forever. Left to the winds of time and space these will no doubt find their way to innocent people in the future. Where are the assurances/expert analysis/science that they will not be released from this "enterprise"?:WxF/

Chapter 1 – IntroductionPage 1-5

Ind 827-6

Stabilization includes **mixing Portland cement with hot spot contaminated soils** in the designated consolidation area to prevent potential water quality impacts

/*WxF: How does Portland cement contaminant remain stabilized with leaching surface and groundwater over decades, especially when the cement forms cracks and crumbles in time and weather? Cyanide, Mercury, and other toxins do not have a half-life. That is once released the toxins remain forever active, an infinite half-life. Can this ever-present danger to surrounding wells and the public be contained or is this time bomb of wishful thinking eventually turn into a contaminated superfund site? How is Rise going to "stabilize" the remaining 1.6 million tons of contaminated soil and where are the funds to cover this one single aspect of this "project"?How are investors going to know that they are not signing up into a scam with all of your "alternatives" representative of hypothetical models and not reality? :WxF*/

Chapter 2 – Executive Summary - Page 2-9

Table 2-1 Summary of Impacts and Mitigation Measures

Impact, Level of Significance, Mitigation Measures, Level of Significance after Mitigation Measures

LS = *Less Than Significant*; LCC = *Less Than Cumulatively Considerable*; S = *Significant*; CC = *Cumulatively Considerable*; SU = *Significant and Unavoidable*

Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level, when feasible.

Ind 827-7

Impacts that are determined to be significant in Chapters 4.1 through 4.13, and for which feasible mitigation measures are not available to reduce those impacts to a less-than-significant level are deemed Significant and Unavoidable, SU. If the decision-making body elects to proceed with a project that would have significant unavoidable impacts, then a Statement of Overriding Considerations explaining the decision to balance the benefits of the project against unavoidable environmental impacts must also be adopted. significant and unavoidable impacts and significant irreversible changes to the environment must be addressed.

/*WxF: Impact, Level of Significance, Mitigation Measures, Level of Significance after Mitigation Measures.

Less than significant impacts, LS, implies less than significance in an expert's judgment or average standard. This is not the same as insignificant impacts, but the implication is made that it is insignificant and impact and therefore allowable. In addition, the magnitude of these less than significant impacts is only a judgment and it implies that there are no costs associated with this characterization of impacts. There are many issues here that will be deemed LS. The costs and judgments should be taken from the community protection position and not a neutral or business encouragement position. This is about the greater good, where the needs of the many outweigh the needs of the few wealthy. Let's face it, this mine re-opening is never going to be about meeting the needs of the many because historically this mine has only served the needs of the few seeking financial profits at the expense of the public commons and by the wealthy corp. investors who have the wherewithal to finance and hoist this tragedy on generally the gullible public that has unscrupulous or corrupt gatekeepers on watch...

5

Typically jobs are the big carrot used by these investors seeking to leverage the public trust and the public commons. The kinds of jobs the mining industry offers historically by today's standards were jobs taken under duress and fraught with great peril to the health and safety of individual workers. This is not the practice or standard for today's jobs. While the cost of jobs in the mine went from $3/day to theoretically today's conservative project offered $400/day, this does not scale up with the cost of living, inflation, taxes, and healthcare expenses from the $3/day. That $3/day allowed a miner to purchase a house and support a family. It is impossible to do the same on $400/day with today's cost of living. So jobs are not even a good carrot or incentive for this community.

Ind 827-8

Then there are the confused conclusions for some of these LS impacts. For example in *Chapter 4.10 – Page 4.10-6* we find under Conclusion, "However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time.**"There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". Therefore it makes this entire section suspect for accuracy of data and integrity of conclusion. It is conclusions like this that destroy the authors' credibility on "less than significant" analysis, and the DEIR's validity of findings in general.

Ind 827-9

The real and major scenarios necessary for predicting traffic impacts from the proposed mining industry re-opening are as follows: Picture yourself driving into town on your relatively peaceful and beauty-filled scenic winding country road. It's always been a pleasure to come into town and you do it every day. All of a sudden you encounter a slow but safe moving very large truck carrying 30 tons of toxic dust and small rocks. The truck bed is bouncing stones onto your windshield and nice car paint job, the dust from the truck bed has continuously overtaken you and that is what you are breathing as you proceed into town. Soon other cars start to pile up, as the truck must travel safely on the narrow winding 1 lane mountain road. Your thoughts have now been changed from the old ambient beauty around you to the stink of diesel and toxic dust the envelope you and the several others behind and in front of you. You are now just part of a slug of traffic going at a reasonably slower rate so that the toxic dump truck in front of you and others can arrive into town safely. That would be thought successful if the truck brakes didn't give out or the turning twisty contortions that the truck had to thread did no damage to its suspension wheels or tires and you all arrived safely at the first intersection in town. Never mind that just those few minutes feel like an eternity and that you could not contain any of your original thoughts, you are now under tremendous stress, along with a slug of others trying to figure out how they can get around this f&^%$# truck in front of you. Now of course the new traffic engineers have engineered, "optimized" traffic so that a whole big slug of cars and the truck can now get through this light with just one green. Not likely but let's just say for mitigating measures' sake that it could happen. What are all the cross-traffic waiting cars going to feel when they get short-changed on the delay times? This stealing from Peter to pay Pay isn't going to be fair to them, is it? But in the DEIR, these are "mitigating measures" that will turn a "significant impact" into a "less than significant impact". Does that make any sense at all? Is the writer of this part of the DEIR even sentient?

Ind 827-10

If that wasn't enough, those impacts deemed LS does have costs all by themselves and are not insignificant and given unfair characterization as such. Less than significant is still part of the erosion of the quality of life overall to the community and evident in every town that has foolishly allowed this kind of destructive business to come in to save the economy. Moreover, these costs can be significant to individuals and health to impact and not necessarily the average.

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The Level and Alternatives approach taken results in individual numbers of increased cancers. While this approach is used elsewhere, it should be noted that even one life is significant and the cost of such infinite. The judgment is made in this DEIR is relative to a public agency standard which must balance the impacts across all parties involved. These agency standards are applied on a particular issue that has been identified and flagged for a case-by-case application with only that agency's field of authority or standards. The applier of these standards must use realistic and conservative models and not easy cherry-picking that is shown throughout this DEIR. Also, the impacts for a particular population when combined may be well above the LS limit, which is taken against one impact not all. For example, when taking into account "jobs for the community" we should note, that a job is interchangeable, a life is not. An individual must be allowed to choose life over a job. That is to say, if there are no safe jobs here in the community, it's still by far better that an individual find a job elsewhere, rather than taking a job here that will shorten his/her life. On a larger scale, this leads to degradation of the quality of life and property devaluation for the entire community. Check the economic impact of living in a small community with a nuclear facility and trucks transporting low-level waste through 111 trucks 24/7 and 365 days a year. Less than significant doesn't come up.

This brings us to Significant and Unavoidable, SU. There are several of these kinds of impacts that will affect individuals that do not in any way benefit from the gold mine operation. It only takes away from their quality of life, whether it added noise, added people traffic or added traffic road rage, higher commuter costs, added air bourn toxic dust from trucks on the roads or tailing, fire danger, well water depletion, water costs, and combinations of these impacts lost quality of life is the result. Multiplied over the individuals in such an affected group is what unfairness and injustice are all about. Good high-tech high-paying jobs are starting to come back, reopening the mine will only if at all, bring in a few low-tech jobs which the community will have to carry the burden in supporting.

:WxF*/

Chapter 2 – Executive Summary Page 2-7

Table 2 – 1 Summary of Impacts and Mitigation Measures

Impact – level of Significance Prior – Mitigation Measures – Level of Significance post Mitigation Measures

Ind 827-11

/WxF: General comment, there are 105 pages of Impacts and Mitigation Measures and **zero** on the economics or costs of such activities. There are thousands of very costly activities required here. The law is such that this endeavor must be economically feasible. But nowhere nowhere nowhere are there any economic cost estimates, material labor environmental social, or living costs. The very obvious conclusion is that there is not a possibility of a positive economically minable mineral outcome, all the alternatives are not just losers, save the one not to re-open for mining mineral, they are alternative deaths to a community. It strikes a reader that this is too odd, that there is no disinterested 3rd party looking into the economic feasibility even though that is the primary nexus to re-opening the mining industry here. The proponent Rise has something else in mind, and the damage costs do not dissuade them from pursuing this obvious boondoggle.

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At the end-of-the-day, the entire DEIR is to educate the public on the practicality and feasibility of this preposterous proposition. The public policy and laws show that this mine reopening is never going to be economic, and yet it is written here in such a way as to imply that all of these "mitigation measures" cost nothing and the proponents can completely manage the "significant impacts" referenced with "mitigating measures" to bring the potential impacts to "less than significant"

Furthermore, these are by no means entirely inclusive of the impacts or severity of the impacts. The "level of significance" before and post-mitigation are some experts' best guesstimate since there are no references to previous costs of doing exactly this mine. Where are the costs for all these WAGs? Why aren't they listed in the Summary of Impacts and Mitigations? These are significant impacts affecting proponents' project to be economic. It's as if Rise and proponents are not worried about the impacts and measure costs, even if they are astronomical. And nobody is watching for the public interest, as certainly this DEIR is grossly deficient in this one section 105 page Impacts and Measures table. Every single entry in this table is deficient and volumes can be had arguing the significance of the impacts, worst-case scenario and costs in $dollars, cost in lives and cost in environmental damage in perpetuity. :WxF/

Chapter 2 – Executive Summary Page 2-8

Example of a typical Measure and impacts –

4.13-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

In conjunction with the submittal of Improvement Plans, the applicant shall submit a comprehensive Vegetation Management Plan, inclusive of the

Ind 827-12

Centennial and Brunswick Industrial Sites, for review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management Plan during the project construction, operations, and reclamation activities. The Vegetation Management Plan shall include but not be limited to:

description of existing vegetative fuel sources;
description of vegetation removal during initial construction and inventory of equipment to be used;

- *requirement that exhausts of all equipment powered by gasoline, diesel, or other hydrocarbon fuel shall be equipped with effective spark arrestors designed to*

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Motor trucks, truck tractors, and passenger vehicles shall not be subject to this provision if their exhaust systems are

- *the requirement that all welding rigs shall be*
- *description of proposed landscape planting*
- *description and graphical presentation of defensible space zones;*
- *long-term maintenance schedule and safety*
    - *Removal of fire-prone fuels and dead material.*
    - *Removal of branches beneath large trees.*
    - *Maintenance of live plants, bushes, shrubs, and trees.*
    - *Removal of needles and leaves and*
    - *Annual grasses and forbs shall be cut down to a maximum height of four inches within 100 feet of structures and on engineered fill slopes.*
    - *Trimming of vegetation within specified horizontal distances from roadways and overhead power line(s), the latter of which may be implemented by PG&E as the service provider, consistent with clearance requirements in PRC Sections 4292 and 4293.*
    - *Seasonal removal of all dead and dying vegetation to reduce vegetation volume and ladder fuels.*
    - *Coordination with adjacent property owners, as applicable, to maintain tree canopies, vegetation, and ladder fuels on an annual basis.*
    - *Horizontal and vertical spacing among shrubs and trees shall be created using the "Fuel Separation" method, the "Continuous Tree Canopy" method, or a combination of both to achievedefensible space clearance*
    - *requirements. Spacing shall be done in accordance with the State Board of Forestry and Fire Protection's "General Guidelines for Creating Defensible Space, February 8, 2006,".*

/WxF: These mitigation measures are very precise but how is this precision going to be applied in the 80 years to come? Are these even the governing models to use? Moreover, the mitigation measures are not going to be free. This is just one "impact" in the table with 1000s more of

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activities, agencies, components, and management that must come together synchronously and in concert to complete these mitigation measures. Where the insurance that proponent will over that will be is accomplished 100% to the satisfaction of all regulatory bodies? Who is going to pay for the doing and monitoring? What is the cost for each activity? What is the degree of mitigation? Who sets the criteria for safety and overtime? It is glaringly obvious to anybody that has gone to a hardware store or had some home repair work done that these "mitigation measures" are going to add up to $100s million. Just the estimates will cost $millions. Who pays? Is the public paying these costs? The few occupational hazard jobs spawned by this project *will not even cover the health insurance costs for those individuals. Cost estimates should be done by a* credible estimator of such activities before a release ofEIRand paid for by Rise or the proponents of this project. Anything less is a conflict of interest or inconsistent with the policies, environment, and business law in authority over these kinds of projects. Are all obviously-not-economic schemes and scams to be investigated by public money? This alone adds weight and credibility to the "investment", to imply that this is a credible and legitimate opportunity for investors is ludicrous. Yet that is happening with this DEIR and process. :WxF/

Chapter 3.0 – Project Description Page 3-20///

4.3-2 ***Asbestos Dust Mitigation Plan.***

Before the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The provisions of the ADMP shall be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 of the California Code of Regulations [CCR] Section 93105) contains specific requirements for the preparation of an ADMP. Conditions of the ADMP shall include the following:

Ind 827-13

/WxF: This section goes on for several pages. All manner of regulations are thrown in for good measure, but what is the approximate cost of each to the population, to workers, to neighbors, to the clueless investors and Rise are unknown. From Rise, from *NSAQMD,* for *gravel pad and maintenance, for Applying chemical dust suppressants or chemical stabilizers, For installing wind barriers, enforcing vehicle speed on all unpaved parts of the project sites, For all earthmoving activities, etc, etc.* Again, how is this mine going to turn a profit and make "mining minerals" economic? These costs aren't something a "volunteer" is going to absorb away and there are many more examples of these glaring deficiencies. See Table 4.3-7 Project Related Health Risks which are grossly understated. Calculations were made for a sunny uneventful day where there were no errors, no mismanagement, no unwatchful inadvertent, negligent or reckless behavior, accidents, or unfortunate by regular/routine acts of nature. Where are the worst-case scenarios? Those shown and used here are not designed basis criteria, these are hopeful nothing goes wrong with standard procedure calculation with no place in an EIR. This is not the way to measure and to plan for, where all only standard normal routine processes and calculations for such are made. "Significant Impacts" are relatively insignificant for normal operational plans. Significant Impacts happen when more than one thing goes desperately awry. No project like this is designed for 80 years of perfect nothing can go wrong with mining-related activity, fault activity,

flooding, and all manner of random acts of god and nature. Hence the need for some extreme scenarios, not the mundane day-to-day operations scenarios. How about a simple traffic scenario: a loaded truck, one of 111 per day, having bad brakes with affected soil en route that contain **lead, arsenic, mercury, asbestos, and other metals at concentrations exceeding** background soil metals concentrations having an accident, where many people are involved in a typical truck accident? What are the costs to humans, to property, and the environment before, during, and after the cleanup? :WxF/

Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy Page 4.3-8

Diesel Particulate Matter

Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More than 90 percent of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and this is a subset of PM2.5. ….. diesel engines, including locomotives, marine vessels, heavy-duty construction equipment, stationary diesel backup generators, among others. Approximately 70 percent of all airborne cancer risks in California is associated with DPM.

Ind 827-14

Chapter 4.3 – Air Quality, Greenhouse Gas Emissions, and Energy

To assess the health risk impacts of the project's construction and operational activities on proximate off-site sensitive receptors, a dispersion modeling analysis was conducted for the HRA of DPM emitted from diesel vehicles and off-road equipment, blasting emissions, and TACs from fugitive dust sources on the project sites.

/WxF: To assess the health risk impact of a project's construction and operational activities one must first apply some common sense on how and where there is likely to be some health impacts. Of all the verbiage served up here, the only thing they got right was the mission to find "fugitive dust sources" but the model and hence analysis conclusion is nonsense, a high school quality lots of rules and regulations but nothing to aid in understanding true impacts. So let's paint a picture as to where and how "fugitive dust sources" would happen. Let's just say you are an ordinary community member going to work or home, and you get stuck following one of these behemoth 30-ton trucks transporting the toxic dust from point A to point B. Keep in mind that these are one-lane mountain roads, and you just got unlucky, and there are 5 other cars ahead of you slowed down by and going at a safe monster truck speed laden with the toxic dust payload. If you are lucky, the rocks aren't cracking your windshield and denting, and damaging your vehicle. But that's not even the big issue. **The 30-ton toxic dust and rock-laden truck payload**

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rumbling down the mountain spewing toxic dust in the air (in all kinds of ppm sizes) in front of you and all of the other drivers slowed to the agonizing safe truck speed. You are breathing this all in. The cancers will be there and you will eventually die from any one of these trips. If you don't get cancer from breathing in that toxic dust from routine trucking distribution of toxic dust then you may be unlucky enough to be involved in a truck accident on this same mountain road. After all, there will be 111 trucks a day every day for 80 years, and trucks, statistically speaking, account for a disproportionately large percentage of mountain road accidents. Whereby the truck spills its payload all over the one-lane mountain road causing a complete blockage to traffic and safety, and you are unlucky enough to be one of them, let's just say for a typical scenario that 7 other cars are involved. The police and first responders come and they are unaware of the toxic dust and perform their duty. So now they are also victimized by the Rise Gold Corporation, which was allowed to perpetuate this travesty so that they could make a few bucks and we the community got a few jobs? These kinds of scenarios are the most likely to happen, not some ridiculous diesel engine emission dispersion analyzed, a misdirection the true impacts, and a lethal Faustian bargain for the community. And it's not even a good Faustian bargain as there is not even a reasonable short-term gain to the community for the long-term horror to plague innocent law-abiding citizens. The community is shafted from the onset, no pun intended. Increased from airborne cancer, intolerable truck traffic on narrow mountain roads, increased accidents on the road from 30-ton trucks, increased wait times delays for small trips for necessities, dramatically reduced quality of life from all of the combination of essentially life's mine re-opening destructors, etc. To somehow conclude that this is a beneficial business for the community is insanity. This complete abortion of dispersion and traffic models is not going to help decision-makers understand what is going on with this mine reopening, as the models and scenarios are cherry-picked to give the answers that give this corruption legs and seem somewhat reasonable to somebody that does not understand science or technology or the correct application of the multiple government agency rules and regulations. :WxF*/

4.3-81 Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis,[41] an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.

Ind 827-15

/*WxF: The "reduce potential asbestos exposure" allows the EIR to use lower concentrations. In a perfect world run by saints, this may be a feasible approach. But this is not an "arms-length" relationship approach nor a worst-case scenario to use the lesser everything is going according to Hoyle concentrations and the higher asbestos source concentrations should be used in all of the exposure calculations, not the 'mitigated" concentrations. This changes the risks to more realistic exposures as the exact location of all asbestos in the mine is only partially known. :WxF*/

Chapter 4.12 – Transportation Page 4.12-8

Level of Service versus Vehicle Miles Traveled

Pursuant to the CEQA Guidelines Section 15064.3, vehicle miles traveled (VMT) is the primary metric used to identify transportation impacts under CEQA. VMT is a measure of the total amount of vehicle travel occurring on a given roadway system. However, because the County considers vehicle level of service (LOS) as a matter of General Plan policy consistency (specifically related to Nevada County General Plan Policy LU-4.1-1 and Policy LU-4.1.2), LOS at the study intersections and roadway facilities is presented and analyzed herein for determining General Plan consistency.

Ind 827-16

/WxF: Thus the best-laid plans of mice and men have fowled the General Plan through smoke and mirror misdirection. The cancer potential damage dispersion has been eliminated through "General Plan consistency" conveniently. The greatest cancer risk will come from the 111+/day trucks burdened with 30 tons of toxic dust spewed into the air on traffic as they lumber their way down the 1 lane mountain roads. Picture yourself in one of 10 cars trailing one of these never-ending and constant behemoths trucks down the narrow windy mountain road while the speed and wind play havoc with their toxic cargo This scenario is amazingly not covered as significant impacts, not just for the havoc on the road, accidents spilling toxic dust on the road, road closures, expensive cleanups, cancers to responders and workers, cancers to the delayed and then there are the real traffic problems which are "unavoidable". The conclusions reached here are nonsense it is just GIGO, garbage in garbage out. :WxF*/

Chapter 4.4 – Biological Resources Page 4.4-87

Conclusion

Based on the above, implementation of the proposed project at the Centennial Industrial Site and Brunswick Industrial Site, and East Bennett ROWs could have a substantial adverse effect on riparian habitat and/or other sensitive natural communities and/or have a substantial adverse effect on State or Federally protected aquatic resources (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filling, hydrological interruption, or other means. Thus, a ***significant*** impact could occur.

Ind 827-17

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a *less-than-significant* level.

/*WxF: Tracking this Mitigation Measures(s) section for many pages is a litany of actions that must be taken to maintain impacts to "less-than-significant. This approach is used throughout the report. These measures are by no means insignificant in costs. One doesn't need to be a cost estimator to understand that these costs of mitigation are insurmountable in cost and monitoring. Moreover, there are many sections of "significant impact" throughout this report. The litany of

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requisite mitigation measure costs for all of these are astronomically large and by far prohibitive to economic mining. :WxF*/

Pg 4.6-5 As noted therein, Rise Grass Valley Inc. entered into a Voluntary Cleanup Agreement (VCA; Docket No. HSA-FY18/19-014) with the Department of Toxic Substances Control (DTSC) for the voluntary cleanup of soil contamination on the Centennial Industrial Site.

Ind 827-18

/WxF: Does DTSC ever refuse a "voluntary cleanup" from anyone? If I were to "volunteer" to clean up my backyard, would DTSC stop me? Are there any teeth to this voluntary declaration? Is there any legal/social/environmental liability to Rise? What happens if Rise RAP just sends a homeless derelict volunteer over to the site to take a look and he says "it looks clean to me".

Or worse, RISE sells a few $100 million in stock based on this "plan" and leaves the country? Who is going to chase the Rise CEO down the road in another jurisdiction, where he is free to perpetuate this scheme again? Fraud is a criminal offense and such an unprofitable enterprise opportunity for stock sales smacks of fraud. :WxF/

Chapter 4.6 – Geology, Soils, and Mineral Resources Page 4.6-23

Ind 827-19

/WxF: This chapter reads policy after policy, tool after tool, procedure, and response, but nothing real is presented. There is no analysis of financial impacts on proponents. How do all of these policies, tools, requisite actions affect the subject project? If they were truly applied, what would the costs be, and to whom? How many and what earthquake fault lines run through the property? What are the ramifications of explosions in the mines, mining activity, have on these and nearby land? There is some talk about Surface Mining Permits, all well and good, but what are they and do property owners on the surface have rights to negate this nuisance? We can talk about a project to split the earth into two equal parts. But shouldn't we first consider the costs of so doing, mitigating measures notwithstanding? The gold mining, economic mining of minerals, was done in Grass Valley that happened ages ago when there were very few people and investors controlled every aspect of the business to the detriment of everybody else. Times have changed, there are lots of people here now, duh, and they don't want their homes and property waterless, contaminated, and devalued. There is only talk about "adverse impacts", but is there anything in the EIR that considers the devaluation of property, public and private, from this boondoggle and it would appear an implication the public is responsible for all of the impacts, in the monitoring of nothing else. The people would have to monitor these activities, and why should the people bear the cost of a private company? A private company cannot monitor itself, history tells us that's folly. :WxF/

Ind 827-20

*Page 4.6-32*While the analysis shows that an active fault likely does not exist, out of an abundance of caution, the County has concluded that a ***significant*** impact could occur concerning exposing people or structures to the risk of loss, injury, or death involving rupture of an earthquake fault, strong ground shaking, ground failure, liquefaction, or landslides.

Mitigation Measure(s) Implementation of the following mitigation measure would reduce the above potential impact to a *less-than-significant* level.

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/WxF: Again, what are the potential costs, and who is to bear them? Are Riser capitalized to the level required and insured to handle all of the mitigation measure costs? How much would just the insurance for covering all of these impacts cost? Where are the economics here? Can I just buy some abandoned mine property and declare my intent to mine for gold and look for investors? Is it that easy? And the county jumps for joy at this opportunity to devastate the community without some investigation of a disreputable corporation without the financial resources to carry through all of the costs associated with such a business? Intent to make a profit by Riser is not evident here. So we can only conclude that there exists a more nefarious exit plan by the proponents. :WxF/

Page 4.6-39 **Conclusion**

The proposed project would involve grading and construction activities at the Centennial and Brunswick Industrial Sites, as well as along East Bennett Road for the installation of the potable water supply pipeline. During construction and engineered fill placement at the Centennial and Brunswick Industrial Sites, topsoils would be disturbed and stockpiled and could be subject to an increased potential for erosion and loss of topsoil. Without the implementation of the mitigation measures in the Steep Slope and High Erosion Potential Management Plans, the proposed project could have a ***significant*** impact related to substantial soil erosion or the loss of topsoil.

Ind 827-21

/WxF: Where is the economic analysis in the "significant impact"? Is this a "significant impact" to a small part of a large part of this operation? Where does "maximally exposed individual" come from in the tables, a nice day every day for 80 years, or some real worst-case scenario for "maximally exposed individual"? Where does the max dose from asbestos come from? Have all of the asbestos sources from and around the mine been identified to a believable level or is a number from a table assigned and all calculations based on that? The fine print states that these sources "incorporates measures designed to minimize asbestos in engineered fill produced by the project, as well as asbestos fibers generated from underground mining from exhausting to the surface" This is not worst-case scenario calculations.

The title says Project Related Health Risks Again, how is this mine re-opening ever going to be "profitable"? Profitability and economic viability are not even remotely possible by even the most permissive standards of 100 years ago. So again, the primary legal nexus for any of this demands the "economics" of viability to profits and profitability. None has been shown and quite the opposite, the sunny-day scenarios and numbers used smack of biased analysis, legitimizes the Rise scam while presenting great potential harm to the Grass Valley community. :WxF/

Chapter 4.4 – Biological Resources Page 4.4-3

Ind 827-22

The excavation areas would be backfilled and regraded with clean fill to promote drainage, and erosion controls will be installed. The engineered fill pad would be graded so that runoff would drain away from the fill slope into surface and subsurface drainage controls. Following completion of the excavation, stabilization, and placement activities, disturbed areas will be

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hydro seeded or broadcast seeded with an erosion-control native seed mix to reduce erosion and maintain fill slope stability.

/WxF: Where is the "clean fill" coming from and what are the costs of this continuous process? "Stabilized" for how long? What is the cost of all of these "drainage controls"? Released toxins last forever. How is are these "controls" monitored and managed over the time of danger, ie while people live and the population increases? The Federal Government doesn't even have a handle on this issue, just ask the DOE/NRC, so why are we allowing a hit-and-run corporation "volunteer" to solve this problem? :WxF/

Chapter 4-7 – Page 4.7-4

Former mining activities (predominantly lode gold mining) at the Brunswick Industrial Site included the Union Hill Mine and the Brunswick Mine. ..... Following its closure, the 20-stamp mill was moved offsite to another mine. The Union Hill Mine was not reopened.

Ind 827-23

/WxF: Q: It closed and not reopened because it was uneconomic to do so, and the environmental laws were non-existent impediments to economics. How is it possible that it would be "economic" to do so now when it wasn't before all the environmental damage costs existed? Where are the economics to show that it is even remotely profitable after the damage to the environment and community? How is this not a gross violation of Policy 17.9, and not even remotely likely that this will be "economic" for a few proponents of an investment opportunity and potentially officials that stand to profit in the future? Certainly, a few jobs are not going to "balance" the potential damage. :WxF/

Chapter 4-7, Page 4.7-10

Historic Storage of Chemicals: Records indicate that chemicals were historically stored at the Brunswick Mine. A warehouse inventory circa 1940 listed gasoline, butane, aviation fuels, kerosene, motor oils, drilling oils, bituminous road oil, copper sulfate, cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid. in the event of a wildfire, fire agencies will set up an incident command center, from which the fire agencies will notify the Sheriff's Office.

Ind 827-24

/WxF: A UN report warns climate change could spur 50% more wildfires by 2100. In the event of a fire, which is much more likely today due to climate change, topography, population, traffic routes, etc will be astronomically more costly and lethal on populations than just a fire, as the air particulate will contain many more lethal chemicals and toxins from the storage of chemicals needed for mining, and even much small quantizes taken in a lung will have much more severe health hazards. A fire at the mine is not just a "fire danger", it's Chernobyl. Where are the insurance costs to cover that? Why is climate change not addressed in any practical worst-case scenario? :WxF/

Chapter 4-7, Page 4.7-17

The handling and storage of hazardous materials are regulated by Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a Hazardous Materials Business Plan…..provides information on the potential impact zone of a worst-case release, and requires plans and programs designed to minimize the probability of a release and mitigate potential impacts.

Ind 827-25

/WxF: Shouldn't a public agency be looking at these requisite plans and programs for economic feasibility before anybody can decide anything? The worst-case release scenario is a very likely forest fire coming through the region, a very likely possibility with the state of our forests and climate change, and vaporizes the stored hazardous materials, gasoline, butane, aviation fuels, kerosene, motor oils, drilling oils, bituminous road oil, copper sulfate, cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid, making them airborne, now the predicted air particulate concentrations contain toxic substances that were not accounted for with just a forest fire. "staying indoors" may not be an option as even tiny quantities of airborne cresylic acid, cyanide, quicksilver mercury, zinc dust, and sulfuric acid will synergize into a Chernobyl situation, with the toxins having infinite half-lives, that is people can never go back home without a clear and present danger to their life and health. :WxF/

Chapter 4.10 – Page 4.10-17

However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time**.

Ind 827-26

/*WxF: Then there are the confused conclusions for some of these LS impacts. For example in *Chapter 4.10 – Page 4.10-17* we find under Conclusion, There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". Therefore it makes this entire section suspect for accuracy of data and integrity of conclusion. It is conclusions like this that destroy the authors' credibility on "less than significant" analysis, and the DEIR's validity of findings in general: WxF*/

Chapter 5 – Statutorily Required SectionsPage 5-17

The proposed project also includes the installation of a potable water supply line in E. Bennett Road to deliver Nevada Irrigation District (NID) potable water to existing residents whose wells may be impacted by the proposed project.

Ind 827-27

/*WxF: There is the assumption here that potable water is the only water that will be taken from adjacent landowners by the project and that existing residents with wells do not use the well water for any other purpose other than potability. If other purposes of water use exist and depend on the impacted wells or will exist in the future, where are the mitigation measure and costs of so doing? Does the proposed potable

water supply line have the capacity to provide for all of the impacted owner's well water well needs currently and in the future? "WxF*/

Chapter 5 – Statutorily Required Sections Page 5-12

The EIR requires the implementation of Mitigation Measure 4.12-10 to re-time the intersection and improve operations and shorten the queue length.

Ind 827-28

/*WxF: The gross assumption here is that re-timing the intersection can improve traffic operations. This is furthermore debatable since there is an underlying accusation that the county currently has poorly timed intersections and less than competent traffic managers setting the timing delays.:WxF*/

Chapter 6 – Alternatives Analysis Page 6-42

Based on the preceding alternatives analysis, the No Project (No Build) Alternative would be the environmentally superior alternative. Under this Alternative, the mine would not be operated at the Brunswick Industrial Site, and as a result, engineered fill would not be hauled to the Centennial Industrial Site.

Ind 827-29

/*WxF: This is obvious before the DEIR was ever undertaken. What is missing are the costs for the bad alternatives or boondoggles :WxF*/

Alternative 2 would be considered the environmentally superior alternative. The main objectives of the project would be achieved with this alternative,….

/*WxF: "environmentally superior alternative" connotes that this very expensive and uneconomically feasible alternative is somehow economically feasible, and not subject to or in violation of the rules for reopening mines. Superior alternative to what? This is especially misrepresentative of the findings since the mitigating measures stated there require that the state of CALIFORNIA eminent domain take the riparian rights of the landowners having impacted well water and compensate with a substitute for all future water required by these landowners sourcing from NID essentially in perpetuity. This "measure" promotes infringing on regional landowner's riparian rights, a litigable matter and cannot be assured to give this alternative life and is certainly not deserving of the title of "superior alternative", as it may not even be a legal alternative. Also, it is much less inferior in every way. All of the alternatives having neighbor well water effects have potentially riparian right violations which render them not alternatives until a court deems so, and these "superior alternatives" should be so changed to read "potentially next least worse alternative" :WxF*/

Ind 827-30

/*WxF:

Conclusion

This DEIR is a seriously flawed piece of work. The primary directive to find and encourage profitable businesses is ignored. The models applied and scenarios used are just wrong. If this wasn't such a serious matter, the models used in the DEIR to predict future environmental and community damage are just bad jokes. Therefore, even the conclusions cannot be taken seriously.

Ind 827-31

18

My personal favorite is the conclusion in *Chapter 4.10 – Page 4.10-19*, "However, the project-generated truck traffic would remain constant, and would not increase over time. **As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time**.".There is no way in hell that after absorbing all of the information given on just the vibration and noise topic alone, that would lead a non-biased party to make this kind of conclusion, "noise levels resulting would decrease over time". **The only way that this conclusion can make any sense, this by analogy, is if one were to suffer a sharp knife stab to the heart, then one would over time relative to the heart not feel pain from a continuous blow torch to the groin.**

:WxF*/

19

INDIVIDUAL LETTER 827: WALT FROLOFF (5)

Response to Comment Ind 827-1
The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter asserts that the DEIR is inadequate, but does not provide specific examples. The commenter's specific comments are addressed in Responses to Comments Ind 827-2 through Ind 827-31. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 827-2
Please see Master Response 1 - Non-EIR/Administrative Issues, and Master Response 2 - Social and Economic Impacts.

The standards of significance for the noise analysis of the DEIR are provided in Section 4.10.3 of the DEIR.

Response to Comment Ind 827-3
The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market.

The project does not propose to use mercury or cyanide, as clearly stated on page 3-25 of the Project Description chapter of the DEIR.

Please see Master Response 2 - Social and Economic Impacts, and Master Response 3 - Operator Responsibility.

As a point of correction, the project would not be located on an EPA superfund site. The Centennial Site has never been on the National Priorities List[7] (A "Superfund site"). The Centennial Site has never been proposed to be placed on the National Priorities List (NPL). The USEPA has prepared a Site Inspection Report in 2019 for the Centennial site but did not score the site using the Hazard Ranking System (HRS). The HRS is the primary method used to place sites on the NPL[8].

Response to Comment Ind 827-4
The commenter asserts that the project violates General Plan Policy 17.10, but the commenter conflates the General Plan's policy to consider the socio-economic impacts of the project with financial feasibility. General Plan Policy 17.10 does not require a financial analysis for proposed projects. Please see Master Response 2 - Social and Economic Impacts, and with regard to operator responsibility, see Master Response 3 - Operator Responsibility. Availability of insurance is not an environmental issue that requires analysis under CEQA.

Response to Comment Ind 827-5
Please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA, and Master Response 9 - Historical Mine Waste at Centennial Site.

Response to Comment Ind 827-6
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

[7] https://www.epa.gov/superfund/superfund-national-priorities-list-npl
[8] https://www.epa.gov/superfund/about-superfund-cleanup-process#pasi

The proposed project is expected to produce mine waste with lower sulfide and metal content than those produced historically, and the historic mine waste has been determined to be Group C mining waste from which any discharge would be in compliance with the applicable water quality control plan, including water quality objectives other than turbidity. Please see Master Response 9 - Historical Mine Waste at Centennial Site.

Mitigation measures require the applicant to submit a Report of Waste Discharge (RoWD) and receive an approved Waste Discharge Requirement (WDR) from the Central Valley Regional Water Quality Control Board (CVRQCB) prior to the placement of cemented paste backfill (Mitigation Measure 4.8-1(d) and engineered fill (barren rock and sand tailings) (Mitigation Measure 4.8-1(e)). These requirements will ensure compliance with all applicable water quality standards. Please see Master Response 8 – Mine Waste Characterization.

Response to Comment Ind 827-7

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 827-8

Page 4.10-6 shows a figure of Noise and Vibration Measurements. The commenter is likely referring to page 4.10-60, which discusses a substantial permanent increase in ambient noise and/or vibration levels associated with the cumulative noise and vibration from all sources of the proposed project. As noted in the Noise and Vibration Analysis, future traffic volumes on the project area roadways would increase over time relative to existing levels due to general growth of the region. However, the project-generated truck traffic would remain constant, and would not increase over time. As a result, the incremental contribution to overall traffic noise levels resulting from the project would decrease over time. For example, East Bennett Road, west of Brunswick Road, currently carries approximately 1,486 vehicles, and the associated noise level is 52.5 dBA. With the project contribution of 111 trucks, the noise level is expected to increase to 54.8 dBA, for a project-related change of 2.3 dB. However, if future traffic levels from cumulative development throughout the region were to increase by ten percent to 1,635 vehicles per day, and the project-related traffic remains at 111 trucks, the total transportation noise level would be 55.0 dBA, but the project-related change diminishes to 2.1 dBA. As a very generic example, one truck on a road that carries 1 car per day, would be quite noticeable and would be the primary noise generator. However, if the traffic increased to 100 cars per day, or say 1,000 per day, the single truck's contribution to total noise would diminish substantially. Because the future project-related traffic noise level increases would diminish over time and remain below the applicable thresholds of significance, the impact is considered to be less-than-significant relative to future cumulative traffic conditions.

Response to Comment Ind 827-9

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Traffic impacts, including the use of heavy trucks were analyzed in Chapter 4.12 of the DEIR. Regarding the possibility of brake failure, CEQA does not require the analysis of speculative impacts. As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 827-10

The commenter's opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Please see Master Response 18 - Air Quality Thresholds.

It is also noted that while many of the project-related concerns noted by the commenter were not identified as significant and unavoidable in the DEIR, it is noted that under CEQA Guidelines Section 15043, the County maintains the authority to approve projects despite significant and unavoidable environmental effects under certain circumstances. Should the Nevada County Board of Supervisors seek to move forward with certifying this EIR and approving the project entitlements, due to the significant and unavoidable impacts that would occur with implementation of the project, the Board would be required to adopt a Statement of Overriding Considerations. The Statement of Overriding Considerations would publicly disclose the process by which the Board weighs the environmental impacts of the project against any other factors. As enumerated in Section 15093 of the CEQA Guidelines, factors to be balanced by the Board when considering projects that would result in a significant and unavoidable environmental impact include economic, legal, social, and technological benefits of projects as well as region-wide or statewide environmental benefits.

Response to Comment Ind 827-11

Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-12

The mitigation measures identified by the commenter are similar to mitigation measures used for other projects in the County. Similar to other projects, the County has authority to enforce mitigation measures, conditions of approval, and the provisions of its County Code. The County charges permitted operators to recoup the County costs associated with inspections and enforcement. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-13

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

The commenter asserts that the DEIR should analyze the worst case scenarios and extreme scenarios. However, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.) While the commenter requests analysis of extreme scenarios, CEQA requires analysis of direct impacts or reasonably foreseeable indirect impacts, not speculative extreme scenarios. (Pub. Res. Code, § 2106.) As stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence."

Response to Comment Ind 827-14

The commenter asserts that there may be impacts associated with heavy trucks travelling on one-lane mountain roads. However, the project does not propose truck traffic on one-lane mountain roads. Please see Chapter 3 of the DEIR.

Regarding the commenter's statements on toxic dust, air quality impacts from the project's use of trucks and all other project operations were analyzed in Chapter 4.3 of the DEIR using accepted standard methods for air quality analysis.

The commenter asserts that impacts may result from trucks spilling rock over one-lane mountain roads. As stated above, the project does not propose truck traffic on one-lane mountain roads. Further, Mitigation Measure 4.3-2 requires that trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings; all loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation and shall either be completely covered with tarps or have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-15

The Health Risk Assessment is based on conservative assumptions. Please see Master Response 22 – Conservatism of Asbestos Assumptions.

The DEIR concludes that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and requires mitigation to reduce the impact to a less than significant level. Mitigation Measure 4.3-2 in the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP.

Response to Comment Ind 827-16

Please see Response to Comment Ind 827-14. Cancer risk from truck traffic was analyzed in the health risk assessment prepared for the DEIR, which found that cancer risk from the project, including traffic, was less than significant.

Response to Comment Ind 827-17

The commenter suggests that the project's required mitigation measures are cost prohibitive and therefore the project is not economically feasible. The applicant believes the project is economically feasible with consideration of mitigation costs. The commenter has not presented substantial evidence that demonstrates the project would be economically infeasible. Further, CEQA does not require that an EIR demonstrate economic feasibility of a project. Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-18

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 827-19

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility. Chapter 4.6 of the DEIR addresses presence of faults and impacts related to seismicity.

Response to Comment Ind 827-20

Please see Master Response 2 - Social and Economic Impacts. Insurance and capitalization are not environmental impacts requiring analysis under CEQA. Please see Master Response 3 – Operator Responsibility.

Response to Comment Ind 827-21

Please see Master Response 2 - Social and Economic Impacts. Please see Master Response 3 – Operator Responsibility.

Please see Chapter 4.3 of the DEIR regarding air quality impacts and the health risk assessment's analysis of the maximally exposed individual and asbestos exposure. Please see Response to Comment Agcy 1-19, Master Response 18 - Air Quality Thresholds, Master Response 22 - Conservatism of Asbestos Assumptions, and Response to Comment Ind 827-17 regarding financial feasibility.

Response to Comment Ind 827-22

This comment is in regard to the DTSC cleanup plan for the Centennial Site, which is a separate project from the Idaho-Maryland Project. Please see Master Response 4 - Historical Mine Waste at Centennial Site, and Master Response 4, Cleanup Project is a Separate Project Under CEQA.

Response to Comment Ind 827-23

The mine was closed in 1956 due to the fixed price of gold at $35 and high-cost inflation. The gold price currently trades on the free market. Please see Master Response 2 - Social and Economic Impacts and Master Response 3 - Operator Responsibility. The commenter asserts that the project violates General Plan Policy 17.9, which encourages mining of economically mineable minerals so the land can be reclaimed for alternative uses, but provides no reasoning as to why the policy is violated. Please see Response to Comment Ind 827-17 regarding financial feasibility. The commenter is also referred to Master Response 1 - Non-EIR/Administrative Issues, regarding the commenter's opposition to the project. Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-24

Wildfire impacts are addressed in Chapter 4.13 of the DEIR. Storage of hazardous materials is analyzed in Chapter 4.7 of the DEIR. The project does not propose to store or use hazardous materials in substantially greater amounts than are stored and used at other industrial operations throughout the County. The commenter asserts that a fire at the mine site would be "Chernobyl"; however, no nuclear power generation is proposed at the project site. CEQA does not require the analysis of speculative impacts. This comment amounts to speculation, and as stated in CEQA Guidelines Section 15384, "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence." The commenter asserts that the DEIR should analyze the worst case scenarios. However, California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.)

Response to Comment Ind 827-25

Please see Response to Comment Ind 827-24.

Response to Comment Ind 827-26

Please see Response to Comment Ind 827-8.

Response to Comment Ind 827-27

The Nevada Irrigation District (NID) approved a water supply assessment, which concluded that NID has sufficient water supplies to provide water to the parcels that are expected to be impacted by dewatering. The Water Supply Assessment (Appendix N of the DEIR) used a conservative water demand for the E. Bennett area of 0.4 gallons per minute (575 gallons per day) per dwelling unit. This is significantly larger than the average single-family home unit demand factor of 0.36 acre-feet per year per connection, which is used by NID for projecting demands (page 18 of the NID 2020 Urban Water Management Plan), and is equivalent to 321 gallons per day. The sizing of the potable water line will be determined by NID based on anticipated flow volumes. The Well Mitigation Plan (Appendix K.9), which has been revised to clarify performance standards, including use of water for irrigation, is attached to the Final EIR as Appendix D.

Response to Comment Ind 827-28

As stated on page 4.12-116 of the DEIR, queues in the northbound left turn lanes of the Brunswick Road/Sutton Way intersection would exceed the threshold of significance. Re-timing of the Brunswick Road/Sutton Way intersection would maintain LOS C conditions (29.5 seconds per vehicle) with queues declining for this movement. Following implementation of Mitigation Measure 4.12-10, the queues are shown to decrease to up to 386 feet under Scenario #1 and 434 feet under Scenario #2, both of which are less than the Cumulative No Project Condition. As such, implementation of Mitigation Measure 4.12-10 would reduce the potential impact to a less-than-significant level if implemented.

Response to Comment Ind 827-29

The commenter's preference for the No Project alternative is noted. Please see Master Response 2 - Social and Economic Impacts.

Response to Comment Ind 827-30

The commenter does not agree with the DEIR that Alternative 2 is the environmentally superior alternative. Comment noted. The commenter also makes a statement regarding taking of riparian rights; however, the commenter does not identify what riparian rights are referenced. Riparian rights are water rights associated with properties adjacent to a stream or river and the project does not propose to eliminate any such riparian rights.

Response to Comment Ind 827-31

Please see Response to Comment Ind 827-8.

The commenter’s opposition to the proposed project is noted for the decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues.

Individual Letter 828



Walter O'Dwyer
15851 Rattlesnake Rd.
Grass Valley, CA 95945
530 477 8529

RECEIVED
MAR 30 2022
NEVADA COUNTY
PLANNING DEPARTMENT

Brian Foss
Planning Director
Matt Kelley
Senior Planner

I Love Nevada County (Grass Valley, Nevada City, Empire Mine ect.) Most of all we are all Concerned about "Climate Change" Lets Do Our Part NO MINE! No toxic Fumes, Gas-

Ind 828-1

Smoke, Water Pollution. The County Will not Profit from this MINE. Consider the Whole Picture. This Development is counterproductive to our Heath to our Air Quality and is Not Necessary Thanks for Accepting this Response

WALTER J O'DWYER
Walter J. O'Dwyer

RECEIVED
MAR 30 2022
County of Nevada
Comm Dev Agency
CDA Fiscal

INDIVIDUAL LETTER 828: WALTER O'DWYER

Response to Comment Ind 828-1

The comments does not directly address the adequacy of the DEIR, but rather expresses general concerns regarding the proposed project. For concerns related to climate change, please see Master Response 16 – Drought and Climate Change. For concerns related to water pollution, please see Chapter 4.8, Hydrology and Water Quality and Master Response 35 – Discharge to South Fork Wolf Creek. Regarding air quality/toxic fume concerns, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy.

It is also noted that the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 829

Matt Kelley,
Senior Planner
Nevada County Planning Dept
950 Maidu Ave Suite 170
Nevada City, CA 95959-7902

March 17, 2022



Dear Mr Kelley,

Ind 829-1 I have been a positive participating citizen in Nevada County since 1988. I worked as a Title 1 Teacher in the Pleasant Valley School District and later was employed as a Water Quality Monitoring Specialist at SYRCL, the South Yuba River Citizens League, and am now retired. I have been a volunteer as a Creek Monitor with Wolf Creek Community Alliance since 2010.

I have grave concerns about the Rise Gold Mine proposal that are environmental in nature.

Ind 829-2 **1)** There will be sizable **degradation to our beautiful Wolf Creek Watershed**, specifically a change to the flow in South Fork Wolf Creek, as erosion increases sediment from mining waste, which then increases turbidity, increasing water temperature which is harmful to fish, especially trout, and sensitive macro invertebrates which don't survive well in sediment laden warmer water. Additionally, needing to place rip rap creating bare soil along stream banks further disrupts the sensitive balance of the riparian habitat and the food chain of these valuable species in our watershed.

Ind 829-3 Pursuant to the **Mitigation Table on page 30, 4.4-1 through page 56**, regarding impacts to the Riparian zones along streams, once barriers are placed, seeding is done, trees planted, I see Mitigations projected for the first two years. I don't believe this will be sufficient given present drought conditions we are now facing. My experience is that establishment of transplants takes longer and is not often successful, and is further affected by increased air pollution caused by the project and should be monitored at least twice a year for at least 5 years, and potentially for the duration of the permitted process.

Ind 829-4 **2)** I have learned from those studying the impacts of the mine on our community that this mining project will use **massive amounts of energy**: 42 billion watt hours per year which is 12% of what Nevada County uses in a whole year and 100% of electricity equal to the use of all the businesses in our county. This mine would completely erase the county's plans to stay environmentally sustainable. I would **much prefer** to support these plans to **ensure sustainable living** especially during these times where we can now witness clear evidence of climate change in our own Sierra Nevada region and NOT do anything that will compromise or add to the progression of climate change such as the reopening of a gold mine. We have already had quite a negative impact from gold mining from the 1850's right here in Nevada County including toxic drainage throughout the Yuba Watershed, Mercury accumulating at the foot of dams which is extremely challenging and costly to remove and incredibly vast piles of rock and sediment along the Yuba River, one example being the Gold Fields along the Parks Bar area of the Yuba River, another near the town of Washington.

3) This brings me to my next major concern: The idea of such a toxic business right in the middle of existing residential neighborhoods is just abhorrent. Plus, the new housing areas being built right now right along the south fork of Wolf Creek will clearly have negative affects from toxic water, mine waste and **NOISE!**

Ind 829-5

Noise is a grave concern of mine. I value our life style here and hope to spend the last 30 years of my life continuing to feel at home in our safe, peaceful and quiet neighborhoods. Constant **NOISE is horrible** and is **grating on our very existence**··· continually 24 hours a day, seven days a week, for 80 YEARS of blasting, grinding, and rock hauling???? Can you even imagine that? Where will the rock debris be taken?? Truly, there is NO "AWAY"! I don't live in the proposed neighborhoods, thankfully! But I live near the highway where Truckloads would be grinding along **every day, all hours of the day, ruining my quality of life** and I know I am speaking for everyone that I know, NO ONE feels happy having to listen to loud truck or drilling NOISE! I cannot picture having meals on the deck with constant drilling, grinding and large truck hauling for anyone in the vicinity of these actions.

In reading **Impact 4.10-3 on page 94, Mitigations** include needing a blast consultant, ground vibrations monitoring consultant, my question is what can be done if it is above the levels deemed acceptable? We know there would be Absolutely Unacceptable amounts of continual Noise and Vibration if this project is begun. We love being outdoors, hiking and bicycling on our many trails, walking along the rivers and creeks. That's what this county represents for me: Peace, quiet, healthy and beautiful living, that's why most of us moved here! Have a mining project within our residential areas would be extremely stressful and not compatible with peaceful living.

Ind 829-6

Thank you very much for your consideration of my concerns. Again, please consider them carefully, looking into our personal future, in which we want to preserve the quality of life here and do not accept anything that would degrade it, and especially remember that the damage that would be done, is not UN- Do-Able, once the wrong decision is made.

Sincerely,

Wendy Thompson

Wendy Thompson
267 Bourbon Hill Road
Nevada City, CA 95959

INDIVIDUAL LETTER 829: WENDY THOMPSON

Response to Comment Ind 829-1
This is an introductory comment. Comment noted.

Response to Comment Ind 829-2
The DEIR biology and hydrology sections included analysis of treated water discharge into South Fork Wolf Creek. DEIR Impact 4.4-2 analyzed potential impacts to special-status species that may use South Fork Wolf Creek and the surrounding habitat. DEIR Impact 4.4-3 considered potential impacts to the riparian habitat surrounding South Fork Wolf Creek. DEIR Impact 4.8-1 considered whether treated water discharge would degrade water quality standards. DEIR Impact 4.8-2 analyzed potential drawdown impacts to South Fork Wolf Creek resulting from dewatering. DEIR Impact 4.8-3 considered potential erosions and sedimentation impacts resulting from treated water discharge. As demonstrated above, impacts to South Fork Wolf Creek were considered and analyzed in the DEIR.

Please also see Master Response 36 - Flows in South Fork Wolf Creek, Master Response 32 - Temperature of Mine Water Discharge, Master Response 34 - Resident Fish, and Master Response 35 - Discharge to South Fork Wolf Creek, regarding the discharge flow volumes, temperature, and quality, potential for erosion, and species impacts.

Response to Comment Ind 829-3
As explained in DEIR Mitigation Measure 4.4-1(a) and Appendix F.4, a maintenance and monitoring program is identified for transplanted Pine Hill flannellbush. Monitoring will occur every six months for the first two years. If transplantation does not meet success criteria, monitoring and maintenance will continue until those success criteria are achieved (see Appendix F.4, section 6.3.2). Irrigation is not prohibited by the DEIR and could be utilized if determined necessary to ensure the success of transplantation. The monitoring and maintenance will continue until success criteria are achieved. If those success criteria cannot be achieved, the Mitigation Measure 4.4-1(a)(5) and the management plan provides alternative maintenance transplantation measures to help achieve success criteria.

Response to Comment Ind 829-4
DEIR Chapter 4.3 analyzed the project's impact on energy and greenhouse gas emissions. DEIR Impacts 4.3-4 and 4.3-5 specifically analyzed the project's use of energy and consistency with State and local renewable energy plans and determined these impacts were less than significant. DEIR Impacts 4.3-7 and 4.3-8 analyzed the project's contribution of greenhouse gases. The DEIR requires implementation of Mitigation Measures 4.3-7(a & b) to reduce construction greenhouse gas emissions to a less than significant level, and operational greenhouse gas emissions were determined to be below the threshold of significance without mitigation. Please see Master Response 16 - Drought and Climate Change, and Master Response 25 - Nevada County Energy Plan.

DEIR impact 4.8-1 considered whether treated water discharge would degrade water quality standards and determined this impact was less than significant after mitigation. Please also see Master Response 35 - Discharge to South Fork Wolf Creek.

Response to Comment Ind 829-5
As discussed on page 5 of the Noise and Vibration Assessment (DEIR Appendix L), audibility is very subjective and can vary from person to person. Thus, audibility by itself is not used as a significance criteria in evaluating noise impacts. In addition, a noise source can be audible without

a substantial increase in ambient noise levels occurring. It is important to note that residents in the general project area, including the City of Grass Valley, are currently exposed to noise from existing trucks on the area roadway network, as well as noise from automobile traffic, all of which are audible. An extensive ambient noise survey was undertaken for the project's noise impact assessment to establish baseline ambient conditions to ensure that any identified substantial noise level increases above those ambient conditions would be identified as significant and that appropriate noise mitigation measures would be developed.

Mitigation Measure 4.10-3.2 requires implementation of a comprehensive noise monitoring program to ensure that the project's noise levels satisfy the County's noise standards once the project is operational and monitoring can be conducted. Specifically, the measure requires the following: "A comprehensive noise survey shall be conducted of each facet of the operation to both verify the modelling assumptions of the project noise analysis…and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors…If the results indicate that the County noise standards are being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc." The noise monitoring measurements will provide a safeguard for the residents, the County and the applicant in ensuring the project's noise generation will be maintained at acceptable levels. Mitigation Measure 4.10-4 sets forth a similar ground vibration monitoring program.

Please see Master Response 1 - Non-EIR and Administrative, regarding quality-of-life concerns.

Response to Comment Ind 829-6

Please see Master Response 1 - Non-EIR and Administrative Issues.

Individual Letter 830

County of Nevada
Nevada County Planning Department
950 Maidu Avenue Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Specific Comments on the Idaho-Maryland Mine Project DEIR

Comments submitted by William J. Clark
324 Vistamont Dr.
Grass Valley, CA. 95945

DEIR Document

Idaho-Maryland Mine Project – Draft environmental Impact Report, December 2021

QUALIFICATIONS

Ind 830-1

William Clark is a 21 year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

DEIR

Page 3-39, Chapter 3.0 Project Description

Water Supply and Other Utilities

Ind 830-2

"The Idaho-Maryland Mine would have a surplus of water from the natural groundwater flow into the underground workings. Once dewatering is completed, approximately 1.9 cfs, or 850 gpm (approximately 1,224,000 gpd), are estimated to be pumped to the surface and settling pond. Such water would support all project-related water demand (i.e., mining and processing activities), except for water purchased from NID as noted below. The process plant would run on a closed circuit.

"Water consumption would include water vapor in ventilation air, cemented paste backfill, concentrates and engineered fill, and dust control and compaction of engineered fill. The following list provides a description of project elements consuming groundwater:

1

• Underground mining service water: Such uses include water use for dust suppression in rock drills and blasted rock piles, which is piped into the mine workings. Net consumption of water would not result from such activities, because water in underground workings is pumped to the surface for reuse.
• Water Vapor in Ventilation: Ventilation air flow through the mine working would become saturated with water vapor, consuming approximately 40,000 gpd of water.
• Cemented Paste Backfill: Water is needed to transport and bind the cemented paste backfill underground. Such water is permanently retained in the backfill or used in the hydration of cement. Backfilling would consume approximately 20,000 gpd of water, assuming a 15 percent water content by mass and 500 tons per day of backfill placed.
• Gold Concentrates and Engineered Fill: Concentrates and engineered fill shipped off-site would contain approximately 24,000 gpd of water.
• Dust Control and Compaction: Active fill areas and unpaved surfaces require water to control fugitive dust, and engineered fill placed at the Brunswick and Centennial Industrial Sites would need to be compacted to meet design standards. Such activities would consume up to 42,000 gpd of water."

Comment: One item on the list is **Water Vapor in Ventilation**. Nowhere in the DEIR or in the Appendices is this item discussed, nor are any analyses presented to explain how the value of 40,000 gallons per day was calculated. There are no lists of assumptions, meteorological values used, or any information on real-world underground mine operations that might produce this condition. Also, there is no discussion for the situation where saturated air venting to the ambient environment during a Winter season may produce clouds of vapor, fog, or other visual effects. The EIR must address this deficiency.

Question: Will the EIR address this subject and present the analyses that produced this amount of water in saturated air within the mine? Will the presentation determine whether the vented air might produce clouds of vapor or fog during Winter months?

Pages 3-13 & 3-31

The proposed above ground building layout on the Brunswick site shows the Change Room/Office building adjacent to the Service Shaft. The DEIR does not discuss the detailed operation of the Change Room except to say the building is 24,000 sq feet in area.

Comment: The Change Room could be where miners come in for a shift and change into clothing suitable for conducting drilling, blasting, and moving tons of broken rock or ore from tunnels and stopes to the Brunswick shaft silo. Then, after shift, the miners enter the change room to change from their mining clothes into their street clothes and exit the building.

Ind 830-3

Absent any substantive discussion in the DEIR on this subject, one can envision the following scenario – the miners suit up in their mining garb, descend in the Service shaft to their assigned tunnel some thousands of feet underground and work their 12 hour shifts drilling, blasting, and moving tons of broken rock and ore up to the surface into the Brunswick silo. During their work shift, the miners are exposed to the toxic dust, blast particulates, silica dust and Asbestos fibers that collect on their skin and their mining clothes, despite the ventilation, the filtering and water

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spray employed. When they ascend to the surface and enter the Change Room, they litter the surroundings with fugitive dust, silica particles and Asbestos fibers. They shower and clean themselves and put on their street clothes and exit the Change Room building, leaving behind their miner's clothing saturated with toxic contaminants and the toxic laden water from the showers that must be drained back into the mine.

Whatever amount of toxic contaminants were that contained within the underground tunnels and stopes has inadvertently been brought to the surface, despite the heroic measures employed to minimize the contaminants escape from the confines of the mine. The DEIR must address this problem and present a design solution with details that describe each step in the process where miners enter and exit the Change Room.

Question: To what level has the applicant studied this problem? Will the EIR contain details of the miner's use of the Change Room with regard to bringing fugitive toxic contaminants from the mine to the above ground surroundings?

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INDIVIDUAL LETTER 830: WILLIAM CLARK (1)

Response to Comment Ind 830-1

The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 830-2

As stated on page 10 of the Water Supply Assessment (WSA) (Appendix N of the DEIR), the water vapor in ventilation air is assumed at 200,000 CFM airflow at 100 % saturation of air at 68 degrees F. As discussed on pages 10 and 11 of the WSA, the non-potable water demand, including water vapor in ventilation, is only 10 percent of the dewatering volume that will be needed. Therefore, the proposed project's non-potable water demands are not discussed further in the WSA. Further refinement of the water lost in water vapor from the mine would serve no purpose and is not required for the analysis of the EIR.

The project would not produce clouds of vapor or fog. Please see Response to Comment Grp 7-95 regarding clouds of vapor or fog from ventilation.

Response to Comment Ind 830-3

Workplace health and hygiene at mines is regulated by the US Mine Safety and Health Administration (MSHA). Mine workers who work in wet environments wear waterproof jackets and pants and do not have clothing saturated with "toxic laden water". Generally, a mine worker washes their boots underground before entering the cage, leaves their boots in the locker area adjacent to the service shaft building, hangs work clothes in the mine dry on baskets, showers, dresses in street clothes, and then exits to the parking lot. The mine facilities are kept clean by janitorial services and work clothing is routinely washed. The general layout of proposed buildings is provided in submitted drawings below.

https://www.nevadacountyca.gov/DocumentCenter/View/30392/Service-Shaft

https://www.nevadacountyca.gov/DocumentCenter/View/30389/Office-and-Water-Treatment

A description of the detailed operations of the Change Room is not required for the analysis of the DEIR, as the amount of rock dust that would be carried on worker's clothing is imperceptible compared to the emissions from other aspects of the project (e.g., hoisting of rock to the surface, loading of trucks, placement of engineered fill, which emissions impacts were considered to be less than significant after mitigation). The emissions associated with mine worker clothing is negligible and would not impact the analysis.

Individual Letter 831

County of Nevada
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Comments on the Idaho-Maryland Mine Project DEIR and Appendix E-1

Comments submitted by William J. Clark
324 Vistamont Dr.
Grass Valley, Ca. 95945

DEIR Documents

1. Appendix E-1 Air Quality and Greenhouse Gas Emissions Analysis Technical Report for the Idaho-Maryland Mine Project Nevada County, California November 20

2. IMM DEIR, December 2021, Section 4.3 Air Quality, Greenhouse Gas Emissions, And Energy

SUMMARY

With respect to Air Quality concerns, the IMM project design has undergone a series of evolutions as described in earlier editions of Air Quality technical reports. Unfortunately, design modifications, changes, and updates have not been presented in a manner that is transparent to a reviewer to understand and critique the evolving design and environmental impacts. The following comments identify specifics of the IMM design as described in the DEIR documents and also question some changes and omissions that have been carried forward to the current documents: IMM DEIR and Appendix E-1.

Without additional information and supporting analyses for key elements of the report, this reviewer cannot declare this DEIR to be both adequate and representative of a final project design with respect to Air Quality and Greenhouse Gas Emissions.

Direct quotes are presented in Italics. In certain instances, information from earlier "editions' of Air Quality reports are included to illuminate areas in question and this information is in indented text.

Finally, deficiencies in certain Mitigations for Air Quality and GHG Emissions are discussed and additional mitigations are suggested for inclusion in the final EIR.

Ind 831-1

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QUALIFICATIONS

William Clark is a 21 year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Ind 831-2

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

1.0 Air Quality & GHG Emissions Analysis & Technical Report-Nov 2021 (Appendix E-1)

Page v, Executive Summary

"*During construction and operations, daily unmitigated emissions of ROG, NOx, and PM10 would be potentially significant (Level A or B) according to the NSAQMD significance criteria; therefore, mitigation is required. The NSAQMD does not have significance criteria for SO2, CO, or PM2.5. According to NSAQMD guidance, emissions exceeding the Level A significance threshold would contribute to existing nonattainment conditions and may also interfere with the region's ability to maintain ambient air quality standards if no mitigation is implemented. Per the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds would reduce project impacts from potentially significant to less than significant. Thus, ROG, NOx, and PM10 would be at either Level A or B and would be less than significant during all years of project construction and operation after implementation of MM-AQ-1 (Mitigations for Use During Construction) and MM-AQ-2 (Construction Exhaust Emissions Minimization Plan). Because construction and operation of the project would not exceed the NSAQMD significance thresholds for ROG, NOx, or PM10, and because the NSAQMD thresholds are based on levels that the MCAB can accommodate without affecting the attainment date for the Ambient Air Quality Standards (AAQS) (the AAQS are established to protect public health and welfare), it is anticipated that the project would result in less-than-significant health effects associated with ROG, NOx, and PM10.*"

Ind 831-3

Comment: The mitigations mentioned here deal with dust and above ground diesel exhaust emissions. However, there will be pollutants and toxic particles generated underground by drilling and blasting that most likely will be exhausted from the 165 ft headframe vent stack and carried around the surrounding environment during the 80 year project. These pollutants consist of ROG, NO_x, PM2.5, PM10, Asbestos fibers and Silica dust. Mitigations must be developed to prevent this.



The ASUR Plan (DEIR Appendix E-2) discusses the ventilation engineering controls and air filtration designed to remove 95% of asbestos fibers but is silent on the controls for the pollutants mentioned above.

Question: Why aren't these impacts addressed? Will there be plans in place to address this problem prior to project approval? Will mitigations be developed to address these pollutants?

Page 9, Section 2.1.2.2 Non-Criteria Air Pollutants

Crystalline Silica

Ind 831-4

"In February 2005, the California Office of Environmental Health Hazard Assessment added a chronic reference exposure level for crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter) (OEHHA 2005). Crystalline silica is a hazardous substance when it is inhaled, and the airborne dust particles that are formed when the material containing the silica is broken, crushed, or sawn pose potential risks. Silicosis results from chronic exposure; it is characterized by the presence of histologically unique silicotic nodules and by fibrotic scarring of the lung (OEHHA 2005). Chronic exposure to respirable silica dust is also associated with the development of tuberculosis/silicotuberculosis, chronic bronchitis, small airways disease, emphysema, and has been implicated in some autoimmune disorders and kidney disease (OEHHA 2005)."

Comment: There is no analysis, test results, discussion or other information presented to address the health hazards of silica dust or silica fragments. Since rock types in the mine include silica bearing minerals, the potential health hazards from airborne silica fragments must be evaluated, and appropriate mitigations must be provided in the EIR.

Question: How will the applicant address this problem and what mitigations will be developed to prevent these toxic substances from being exhausted to the surroundings via the headframe ventilation stack?

Page 18, Section2.3.2 Local Ambient Air Quality

Ind 831-5

"CARB, air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. NSAQMD monitors local ambient air quality near the project site. Air quality monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2016 to 2018 are presented in Table 2, Local Ambient Air Quality Data. The Grass Valley monitoring station, located at 200 Litton Drive, Suite 230, Grass Valley, CA 95945, is the nearest air quality monitoring station to the project site, located approximately 1-mile northwest of the Centennial Industrial Site. However, because the Grass Valley station only monitors O3 and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project site). The data collected at these stations are considered generally representative of the air quality experienced in the

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project vicinity. The number of days exceeding the ambient air quality standards are also provided in Table 2."

Comment: The effort to create a viable air quality environment model for the project vicinity required the use of data obtained from local and out of area locations. While laudable in intent, the result misses the mark. For example, PM10 measured in Yuba City located 31 miles to the West of the site will not measure true PM10 emissions from the site since prevailing winds blow from the South and Northeast. Also, Yuba City is 95 ft elevation compared to 2700+ ft at the project site. The same inconsistencies exist for measurements of NO2 and CO. Also, the use of outdated air quality data requires a stretch of imagination since the underlying assumption is that nothing has changed in the interim – be it population, vehicles owned, residential housing developed, and new construction projects.

The DEIR should include more comprehensive pertinent data from NSAQMD and the CARB to obtain current and future predictions for the pollutants and TACs discussed in the DEIR.

Question: Since there were no other sources for measurements of these pollutants, why is there no discussion of the validity of the air quality data presented or the confidence level of the data? How can the predictions for air quality measurements be justified over the 80 year span of the IMM project? How were the results for air quality measurements and emissions vetted prior to inclusion in the DEIR?

Page 25, Section 2.4.2.1 Construction Emissions

... *"To account for dust control measures in the calculations, it was assumed that active work sites would be watered at least two times daily, resulting in an approximately 55% reduction of particulate matter. In addition, chemical stabilizers would be applied to any unpaved roads on-site, which would result in an approximately 80% reduction of particulate matter. For a worst-case day, it was conservatively assumed that 2 diesel emergency generators (2,655 horsepower (hp) each) would undergo routine testing and maintenance of up to 2 hours each on the same day, 1 time per month. For annual emissions, these emergency generators were assumed to undergo testing and maintenance for up to 100 hours, based on CARB's ATCM for Stationary Compression Ignition Engines. Emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines, were incorporated into the modeling. Detailed assumptions and emission factors are included in Appendix A. Notably, electrically powered equipment would not contribute to criteria air pollutants or TACs at the project site, but would result in GHGs associated with electricity generation (see Section 3, Greenhouse Gas Emissions)."*

Ind 831-6

Question: Under what assumptions regarding temperatures, humidity, wind, and surface material composition would watering active work sites result in a 55% reduction of particulate matter? Is there test data to back up this claim? How sensitive is this 55% number? How would predictions change if the number was 25%, or 75%? Same question for the 80% reduction of

particulate matter by applying chemical stabilizers to unpaved roads. What is the composition of these chemical stabilizers?

Page 57, Section 2.6 Emergency Generator use during PSPS

"Public Safety Power Shutoffs are infrequent (as an example, 9 days of power outages would be a conservative representation based on the Public Safety Power Shutoffs in recent years) and emergency generator use may not be needed at all during construction and/or years of operations. However, for disclosure, maximum daily emissions were estimated for 2,655 hp emergency generator usage during construction (two generators) and operations (four generators), assuming all emergency generators would operate for 24 hours per day. Emissions for the generators were estimated based on the exhaust emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 19 are for informational purposes only."

Ind 831-7

Comment: In the past two years power outages have occurred twice a year and have become predictable, as PGE should attest. Whenever valley winds are above a certain level, PGE institutes a PSPS that effects Nevada County even though the high winds and wind gusts are in areas far removed from our location. These winds are predictable in the Spring, Summer, and Fall, though the exact days are not. Rain and snow storms have caused power outages County wide for two weeks in some areas. Given these "real world" events, a conservative time span for generator usage would be of the order of two weeks a year – one week in Spring/Summer and one week in Fall/Winter which would require generator usage for a total of 336 hours per year. Emission results should include this usage and should not state this to be "speculative". These events will continue to occur and are predictable during the year. The exact days and weeks during the year remain speculative. Power outage calculations should take into consideration the recent historical record of power outages.

Question: Will the emissions from emergency generator usage be removed from the "speculative" nature to a "predictable" nature and be included in the emission table as occurring throughout the year? Will PGE be contacted to acknowledge a predictable number of PSPS outages per year? What are the reasons not to include the generator emissions in the emission tables as predictable outages?

The DEIR should include power outages values based upon the average of the past three years and with consideration of the projected increased lengths and severities of the fire season.

Page 10 – 11, Appendix B, Section 4.1 Dispersion Model, Table 2.

Ind 831-8

Comment: Table 2 contains several errors in the description of Emission sources used as input data to the mathematical and computer models to produce dispersion predictions. Emission

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sources STCK 8, STCK9, STCK10, and SLN1- SLN9 are incorrect. In view of these input "errors" the dispersion results and conclusions reached based on the results are unreliable. This analysis must be redone.

Question: Please explain why certain of the data is obviously incorrect and why were they used in the Dispersion models? Why were base elevation values not checked for consistency (feet/meters)? For STCK8, what is the basis for the values for gas exit temperature, exit velocity, or exit flow rate? What were the methods used to verify these input values and what check cases were run to validate the dispersion models used and the results obtained?

Page 12, Appendix B, Section 4.1, Dispersion Model

*"• **Meteorological Data:** The nearest stations with processed meteorological data for use in AERMOD are Blue Canyon (17 miles away), Auburn (18 miles away), and Beale (22 miles away). The predominant wind direction at the project site is from the North-East and South-West direction (Meteoblue 2020). The Blue Canyon met station has a predominant wind direction from the North-East and South; the Auburn met station from the East; and the Beale met station from the South-East and North-West (CARB 2020). Blue Canyon was selected since it is the closest station and is the most representative of the project site. The latest 6-year meteorological data (2009–2014) for the Blue Canyon – Nyack Airport were downloaded from CARB, and then input to AERMOD. A wind rose is provided for this station in Figure 1."*

*"• **Urban and Rural Options**: Typically, urban areas have more surface roughness and structures and low albedo surfaces that absorb more sunlight, and thus, more heat, relative to rural areas. The rural dispersion option was selected based on the predominant development within 2 kilometers of the project site."*

Ind 831-9

*"• **Terrain Characteristics**: Digital elevation model files were imported into AERMOD so that complex terrain features were evaluated as appropriate for the site. This accounts for complex terrain within 2 kilometers of the site. The National Elevation Dataset (NED) dataset with resolution of 1/3 arc-second was used. The AERMAP terrain preprocessor, which can process U.S. Geological Survey (USGS) Digital Elevation Model (DEM) data and data from the NED, is also used to generate the terrain elevations for the receptor locations. The AERMAP program generates an output file that contains the receptor pathway data for AERMOD."*

Comment: Blue Canyon is located in the Sierra Nevada Mountains at almost twice the elevation of the project site and subsequent meteorological changes associated: 10° lower temperature differential, different types and amounts of precipitation, etc. AERMOD was corrected for elevation but nearly all parameters related to weather would need to be corrected for accuracy. Air density is related to altitude, atmospheric pressure, temperature and humidity. Atmospheric pressure decreases as altitude increases along with effects of solar radiation.

For example, the hot season lasts for 3.1 months in Grass Valley, from June 15 to September 18, with an average daily high temperature above 81° F. In Blue Canyon there is no hot season. The warm season there lasts for 2.9 months, from June 20 to September 18, with an average daily



high temperature above 72°F. Average hourly temperatures also vary dramatically between the two locations. Temperature ranges as well as hourly temperatures have a significant impact on ozone production. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The entire model set and input data parameters must be revisited and a revised set of dispersion data must be included int the EIR.

See Page 3, Section 2.1.1 Meteorological and Topographical Conditions.

"The prevailing wind direction over the County is westerly. However, the terrain of the area has a great influence on local winds, so that wide variability in wind direction can be expected. Afternoon winds are generally channeled up-canyon, while nighttime winds generally flow down-canyon. Winds are, in general, stronger in spring and summer and lower in fall and winter. Periods of calm winds and clear skies in fall and winter often result in strong, ground-based inversions forming in mountain valleys. These layers of very stable air restrict the dispersal of pollutants, trapping these pollutants near the ground, representing the worst conditions for local air pollution occurring in the County."

Ind 831-10

Question: Given the differences between Blue Canyon and Nevada County, what is the basis to equate the two areas when analyzing the impacts to the air quality in the grass valley area? What test cases were run to verify and validate the topographical and meteorological model created from the sources described? Was the climate model vetted by third party sources such as NSAQMD or CARB? Given the errors mentioned in Table 2 (Emission Sources), how can the predictions for the effects on Air Quality at the IMM project site by taken with any degree of confidence? Why was the **Urban/Rural** choice taken as **Rural** when Grass Valley has become more **Urban** over the past 8 years since 2014? Why wasn't the dispersion model exercised with the **Urban** data to produce results that could be compared with results using the **Rural** data? Why wasn't more recent data used instead of relying on 8 year old data? The results from the model are unreliable and should be redone with correct inputs.

Page 74, Section 3.2.3.3 Nevada County (Local Regulations)

"Nevada County adopted the Nevada County Energy Action Plan (EAP) in February 2019 (Nevada County 2019), which provides an analysis of the energy use within the unincorporated County limits and County operated facilities, as well as strategies for accelerating energy efficiency, water efficiency, and renewable energy efforts already underway in Nevada County. The goal of the EAP is to reduce the projected annual grid supplied electricity use in 2035 by 51%, and annual natural gas use by 30%. Notably, the actions within the EAP are voluntary and do not require the County or community to meet the reduction goals; however, savings may only be realized if the recommended actions are taken (Nevada County 2019)."

Ind 831-11

Comment: There are no plans discussed in this report that speak to the use of Solar energy to provide electrical power to keep the batteries of the underground equipment in a full state of charge. Now that more electrical equipment is proposed in order to eliminate pollution sources specific to diesel engines, Solar energy could be a useful solution to minimize the generation of local energy from PGE. PGE would realize a benefit from not having to generate the large

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electrical demand to meet the needs of the IMM project and would reduce the GHG associated with energy production.

Question: Why isn't the energy consumption of the project mitigated with a solar energy system?

Page 78, section 3.4.1 Thresholds of Significance

"The significance criteria used to evaluate the project's GHG emissions impacts are based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this GHG emissions analysis, the project would have a significant environmental impact if it would (14 CCR 15000 et seq.):

1. *Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.*

2. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. At this time, neither the NSAQMD nor the County has adopted numerical thresholds of significance for GHG emissions that would apply to the project. The NSAQMD, however, recommends that all projects subject to CEQA review be considered in the context of GHG emissions and climate change impacts, and that CEQA documents include a quantification of GHG emissions from all project sources, as well as minimize and mitigate GHG emissions as feasible (NSAQMD 2019). The project would generate GHG emissions through short-term construction activities and long-term operational activities."*

Ind 831-12

Comment: These statements apply to the IMM project. Since the project will use cement to mix with ore rock tailings in a slurry to backfill mine tunnels and raises no longer used, the amount of GHG (CO2) generated to produce an amount of cement in the order of 500 tons per day will be over 10,000 MT CO_{2e} per year in the location of the producing source. So, as a result of the use of this cement, the IMM project has a significant impact on the environment.

Question: Why hasn't this fact been presented and discussed in the DEIR so the residents of Nevada County can make a reasoned assessment of the impact that the project will have on the environment either directly or indirectly?

NOTE: The following material has not been included in Appendix E-1. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of Appendix E-1. The final EIR must respond to this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives. The Applicant Proposed Measures discussed are in indented text.

Ind 831-13

Page 38, Section 2.4.3 Applicant proposed Measures

In the **December 2020** edition of this Air Quality and GHG Emissions report, two Applicant Proposed Measures (APM) were added. These Applicant Proposed Measures are relevant to the

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air quality analysis and are presented below. This Impact Analysis assumes that all APMs would be implemented as conditions of approval, as defined below. However, neither one of these APM's has been carried forward to the DEIR or Appendix E-1 nor has any discussion or analyses been presented to explain or justify the removal of these APM's.

> *"**APM-AQ-3**: Underground Fugitive Asbestos Dust Control. Rise Grass Valley Inc. shall employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to the surface. Engineering controls could include air filtration, water curtains, or other methods designed to remove 90% of asbestos fibers."*

Comment: There is no discussion of the ventilation systems, engineering controls, filtration, or other methods used to mitigate the Asbestos exposure to mine workers or the above ground population. There is no discussion or analysis to verify that the solutions alluded to will remove 90% of Asbestos fibers. There is no analysis or discussion to explain how the remaining 10% of Asbestos fibers will be prevented from being exhausted from the headframe vent stack into the ambient environment.

Question: Why is the analysis and discussion to address the above issues not presented in the DEIR? Where have the Health Risks been analyzed that used a range of values for Asbestos or silica? How sensitive are the Health Risks for slight changes in the amounts of Asbestos or silica? In other words, what are the safety factors in the results? How much confidence is there for the 90% Asbestos removal?

> *"**APM-AQ-4**: Air Quality Monitoring. Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites."*

Ind 831-14

Comment: These two APM's are Applicant Proposed Measures. However, their elimination implies that the applicant is no longer in favor of such measures. The Air Quality monitoring measure needs to be implemented and to be in force before any construction activity is started. These monitoring stations must be operational in order to establish a baseline of pollution monitoring before and during construction and mining operations. Equipment should be installed to measure Ozone, PM2.5, PM10, SO2 and NO_x. There is no discussion in this report that explains why this APM has been removed and there is no information presented as to possible benefits to the IMM project or the surrounding environment that may be achieved by removing this APM.

(The value of such coordination with the NSAQMD has been verified by a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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Question: What are the reasons for removing this APM from the Air Quality and GHG Emissions Analysis report? How will the applicant monitor the project environment to provide information to analyze the effectiveness or lack thereof of the various mitigation plans proposed? What is the benefit to the applicant and the surrounding community for removing this APM?

Air Quality & GHG Emissions Analysis & Technical Report – MARCH 2021

Pages 32-33, Section 2.4.2.4 Health Risk Assessment

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Ind 831-15

Comment: In the **March 2021**edition of the report the Asbestos content was assumed to be 0.0025%. In the **December 2020** version the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because it is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR represent the current project design. But without a paper trail or other explanations, this is entirely speculative.

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Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

> *"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."*

Ind 831-16

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. This edition of the report states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present rest results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

2.0 IMM DEIR, December 2021, Section 4.3 Air Quality, Greenhouse Gas Emissions, And Energy

Ind 831-17

Page 4.3-2

> *"The prevailing wind direction over the County is westerly. However, the terrain of the area has a great influence on local winds, so that wide variability in wind direction can be expected. Afternoon winds are generally channeled up-canyon, while nighttime winds generally flow down-canyon. Winds are, in general, stronger in spring and summer and lower in fall and*

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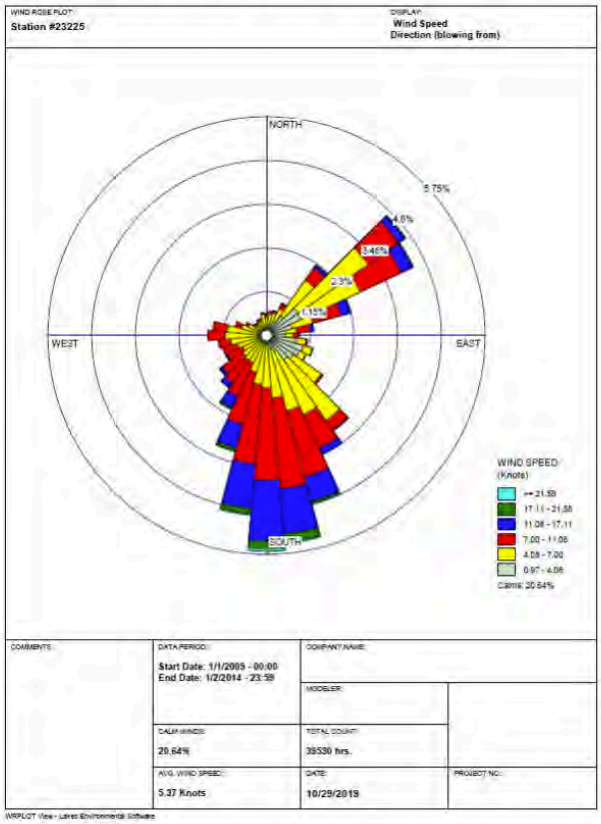
winter. Periods of calm winds and clear skies in fall and winter often result in strong, ground-based inversions forming in mountain valleys. These layers of very stable air restrict the dispersal of pollutants, trapping these pollutants near the ground, representing the worst conditions for local air pollution occurring in the County."

Comment: This statement above concerning prevailing wind direction is in direct conflict with the Wind Rose plot on page 16 of section 4.1 of Appendix B. Dispersion Model shown below: One can see the prevailing winds are from the South, South West, and North East.



Question: Why is this contradiction presented in the report? Why is this contradiction carried forward through every edition of the Air Quality reports to appear in the DEIR? Why is there no discussion to reconcile this conflict?

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Ind 831-18

Page 4.3-9 Crystalline Silica

"In February 2005, the California Office of Environmental Health Hazard Assessment (OEHHA) added a chronic reference exposure level for crystalline silica (quartz, cristobalite, tridymite) of respirable size (defined as 4 micrometer particle aerodynamic diameter. Crystalline silica is a hazardous substance when it is inhaled, and the airborne dust particles that are formed when the material containing the silica is broken, crushed, or sawn pose potential risks. Silicosis results from chronic exposure; it is characterized by the presence of histologically unique silicotic nodules and by fibrotic scarring of the lung. Chronic exposure to respirable silica dust is also associated with the development of tuberculosis/silicotuberculosis, chronic bronchitis, small airways disease, emphysema, and has been implicated in some autoimmune disorders and kidney disease."

Comment: There is no analysis, test results, discussion or other information presented to address the health hazards of silica dust or silica fragments. Since rock types in the mine include silica bearing minerals, the potential health hazards from airborne silica fragments must be evaluated, and appropriate mitigations must be provided in the EIR.

Question: How will the applicant address this problem and what mitigations will be developed to prevent these toxic substances from being exhausted to the surroundings via the headframe ventilation stack?

Ind 831-19

Pages 4.3-10, 11 & Table 4.3.4

"The Grass Valley monitoring station, located at 200 Litton Drive, Suite 230, Grass Valley, CA 95945, is the nearest air quality monitoring station to the project sites, located approximately one mile northwest of the Centennial Industrial Site. However, because the Grass Valley station only monitors ozone (O3) and PM2.5, additional measurements were taken from the Yuba City monitoring station (773 Almond Street, Yuba City, CA 95991), approximately 31 miles west of the project sites. The data collected at these stations are considered generally representative of the air quality experienced in the project vicinity."

Comment: The effort to create a viable air quality environment model for the project vicinity required the use of data obtained from local and out of area locations. While laudable in intent, the result misses the mark. For example, PM10 measured in Yuba City located 31 miles to the West of the site will not measure true PM10 emissions from the site since prevailing winds blow from the South and Northeast. Also, Yuba City is 95 ft elevation compared to 2700+ ft at the project site. The same inconsistencies exist for measurements of NO2 and CO. Also, the use of outdated air quality data requires a stretch of imagination since the underlying assumption is that nothing has changed in the interim – be it population, vehicles owned, residential housing developed, and new construction projects.

Question: Since there were no other sources for measurements of these pollutants, why is there no discussion of the validity of the air quality data presented or the confidence level of the data? How can the predictions for air quality measurements be justified over the 80 year span of the IMM project? How were the results for air quality measurements vetted for inclusion in the DEIR?

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Page 4.3-32 EO N-79-20

"EO N-79-20 (September 2020) establishes a Statewide goal that 100 percent of in-state vehicle sales of new passenger cars and trucks shall be zero-emission by the year 2035. The order directed the CARB to develop and propose passenger vehicle and truck regulations requiring increasing volumes of new zero-emission vehicles sold in the State in order to achieve the goal by 2035. In addition, the order required that a Zero-Emissions Vehicle Market Development Strategy be created and updated to ensure coordinated and expeditious implementation of the EO."

Ind 831-20

Comment: The IMM project period is well within the time span to meet this Zero Emission Vehicle goal. The applicant should be made aware of the State's goal and be required to disclose the project's plans to accommodate this goal. The purchase of out of state vehicles should be discouraged. Contractors used by the applicant should also respond to this order as well as companies that supply rented or leased equipment.

Page 4.3-46, Table 4.3.7 Construction Off-Road Equipment Assumptions

Ind 831-21

Question: The table lists several ventilation fans used during construction. Main Ventilation Fan (1); Booster Ventilation Fans (2); Auxiliary Ventilation Fans (3). There is no discussion of these fans in this DEIR section or in Appendix E-1. Where are they used? During which phases of the project do they operate? Where are they located? What are the fan speeds, air flow, etc. Will The applicant develop an operational timeline that explains where each of these fans are employed?

Page 4.3-49

"Entrained or fugitive dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, primarily during the grading phase, resulting in PM10 and PM2.5 emissions. The project would include implementation of Surface Fugitive Dust Controls, which would limit fugitive dust (PM10 and PM2.5) that may be generated during grading and construction activities through activities such as limiting vehicle speeds on unpaved roads, watering exposed surfaces periodically, and covering material stockpiles, among other strategies to reduce fugitive dust. To account for dust control measures in the calculations, the assumption was made that active work sites would be watered at least two times daily, resulting in an approximately 55 percent reduction of particulate matter. In addition, chemical stabilizers would be applied to any unpaved roads on-site, which would result in an approximately 80 percent reduction of particulate matter."

Ind 831-22

Question: Under what assumptions regarding temperatures, humidity, wind, and surface material composition would watering active work sites result in a 55% reduction of particulate matter? Is there test data to back up this claim? How sensitive is this 55% number? How would predictions change if the number was 25%, or 75%? Same question for the 80% reduction of particulate matter by applying chemical stabilizers to unpaved roads. What is the composition of these chemical stabilizers?

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Page 4.3-50

"Off-Road Equipment
Operational equipment is summarized in Table 4.3-10. Emission factors for these sources were incorporated into a spreadsheet model that includes the CARB OFFROAD2011 model for diesel fueled off-road equipment (see Appendix A of the Dudek Analysis, included as Appendix E.1 to this EIR). Notably, all diesel equipment owned by Rise Grass Valley Inc. would be equipped with Tier 4 Final engines, which feature the highest standard of emissions control technology. As with construction, the electrically powered equipment would not contribute to criteria air pollutants or TACs at the project sites but would result in GHGs associated with electricity generation. All underground equipment would be electrically powered."

Ind 831-23

Comment: This statement above regarding diesel engines appears throughout the Air Quality section of the DEIR and Appendix E-1, "*... all diesel equipment owned by Rise Grass Valley Inc. would be equipped with tier 4 Final engines."*…This section does not discuss the situation where the applicant uses contractors or other lessors of equipment that do not use Tier 4 Final engines. Nor do dispersion predictions show any data where Tier 3 engines were used.

Question: How will the applicant guarantee the use of Tier 4 Final engines regardless of who supplies the equipment? Will the applicant generate dispersion predictions assuming only Tier 3 engine usage to inform the public of the consequences of such usage?

Page 4.3-62

First paragraph - …*"Based on the PM_{10} emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of health risk modeling."*

Ind 831-24

Question: Health Risk modeling appears to be based on estimates of estimates. How were the estimates of PM_{10} emissions obtained? What were the values for emissions of asbestos, silica, and heavy metals used for the Health Risk modeling? What is the confidence level of these values?

From Appendix E-1, Page 20, Section 2.4.2.1 Construction Emission

Ind 831-25

Note that the entries for Emergency Generators are assumed to be operated for 100 hours per year for testing and maintenance. The argument for this is that emergencies (PSPS outages) are not predictable and are speculative. As such the emissions can be left out of emission tabulations. However, the counter argument is made in the comments for **Appendix E-1** and are repeated here:

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From Appendix E-1, Page 57, Section 2.6 Emergency Generator use during PSPS

"Public Safety Power Shutoffs are infrequent (as an example, 9 days of power outages would be a conservative representation based on the Public Safety Power Shutoffs in recent years) and emergency generator use may not be needed at all during construction and/or years of operations. However, for disclosure, maximum daily emissions were estimated for 2,655 hp emergency generator usage during construction (two generators) and operations (four generators), assuming all emergency generators would operate for 24 hours per day. Emissions for the generators were estimated based on the exhaust emission data sheets for the representative Cummins model QSK60-G17, which are Tier 4 Final engines. Since the use of emergency generators is speculative and beyond the reasonable control of Rise Grass Valley, Inc., the emissions presented in Table 19 are for informational purposes only."

Comment: In the past two years power outages have occurred twice a year and have become predictable, as PGE should attest. Whenever valley winds are above a certain level, PGE institutes a PSPS that effects Nevada County even though the high winds and wind gusts are in areas far removed from our location. These winds are predictable in the Spring, Summer, and Fall, though the exact days are not. Rain and snow storms have caused power outages County wide for two weeks in some areas. Given these "real world" events, a conservative time span for generator usage would be of the order of two weeks a year – one week in Spring/Summer and one week in Fall/Winter and would require generator usage for a total of 336 hours per year. Emission results should include this usage and should not state this to be "speculative". These events will occur and are predictable during the year. The exact days and weeks during the year remain speculative. Power outage calculations should take into consideration the recent historical record of power outages.

Question: Will the emissions from emergency generator usage be removed from the "speculative" nature to a "predictable" nature and be included in the emission table as occurring throughout the year? Will PGE be contacted to acknowledge a predictable number of PSPS outages per year? What are the reasons not to include the generator emissions in the emission tables as predictable outages?

The DEIR should include power outages values based upon the average of the past three years and with consideration of the projected increased lengths and severities of the fire season.

NOTE: The following material has not been included in the DEIR. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of the DEIR. The final EIR must include this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives. The Applicant Proposed Measures discussed are in indented text.

Ind 831-26

Page 4.3-65 Applicant Proposed Measures

In the **December 2020** edition of this Air Quality and GHG Emissions report, two Applicant Proposed Measures (APM) were added. These Applicant Proposed Measures are relevant to the air quality analysis and are presented below. This Impact Analysis assumes that all APMs would

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be implemented as conditions of approval, as defined below. However, neither one of these APM's have been carried forward to Appendix E-1 nor has any discussion or analyses been presented to explain or justify the removal of these APM's.

> *"**APM-AQ-3: Underground Fugitive Asbestos Dust Control.** Rise Grass Valley Inc. shall employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to the surface. Engineering controls could include air filtration, water curtains, or other methods designed to remove 90% of asbestos fibers."*

Comment: There is no discussion of the ventilation systems, engineering controls, filtration, or other methods used to mitigate the Asbestos exposure to mine workers or the above ground population. There is no discussion or analysis to verify that the solutions alluded to will remove 90% of Asbestos fibers. There is no analysis or discussion to explain how the remaining 10% of Asbestos fibers will be prevented from being exhausted from the headframe ventilation stack into the ambient environment.

Question: Why is the analysis and discussion to address the above issues not presented here? Where have the Health Risks been analyzed that used a range of values for Asbestos or silica? How sensitive are the Health Risks for slight changes in the amounts of Asbestos or silica? In other words, what are the safety factors in your results? How much confidence is there for the 90% Asbestos removal?

> *"**APM-AQ-4: Air Quality Monitoring.** Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites."*

Comment: These two APM's are applicant proposed measures. However, their elimination implies that the applicant is no longer in favor of such measures. The Air Quality Monitoring measure needs to be implemented and to be in force before any construction activity is started. These monitoring stations must be operational in order to establish a baseline of pollution monitoring before and during construction and mining operations. Equipment should be installed to measure Ozone, PM2.5, PM10, SO2 and NO_x. There is no discussion in this report that explains why this APM has been removed and there is no information presented as to possible benefits to the IMM project or the surrounding environment that may be achieved by removing this APM.

(The value of such coordination with the NSAQMD has been verified by a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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Question: What are the reasons for removing this APM from the Air Quality and GHG Emissions Analysis report? How will Rise Gold monitor the project environment to provide information to analyze the effectiveness or lack thereof of the various mitigation plans proposed? What is the benefit to the applicant and the surrounding community for removing this APM?

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Pages 32-33, Section 2.4.2.4 Health Risk Assessment

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Ind 831-27

Comment: In the **March 2021** edition of the report the Asbestos content is assumed to be 0.0025%. In the **December 2020** version the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because that is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR represent the current project design. But without a paper trail or other explanations, this may be entirely speculative.

Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

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Ind 831-28

"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. This edition of the report states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present test results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

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Mitigation Measures Proposed in the DEIR

Pages 2-14 through 2-30, Table 2-1, 4.3 Air Quality, Greenhouse Gas Emissions, and Energy

Ind 831-29

4.3-1 Mitigations consist of Project Improvement Plans, Traffic Control, Construction Exhaust Emissions Minimization Plan, and use of Tier 4 diesel engines. There is no description of the contents of these plans, or who will monitor adherence to the plans or what enforcement mechanisms will be in place to ensure compliance. Also, there are loopholes which provide the applicant a way out of using Tier 4 diesel engines for project related equipment.

Ind 831-30

4.3-2 Mitigation is by an Asbestos Dust Mitigation Plan (ADMP). The mitigation measure does not mention the goals of the ADMP. Is it to "Prevent" Asbestos dust? Is it meant to "minimize" Asbestos dust, or is to "control" Asbestos dust? In the IMM project, words matter. Also, there is no discussion of who monitors the performance, or who enforces the performance requirements, or the enforcement mechanism proposed in the ADMP. For dust control, there are two options, wet the ground or suspend grading operations. This is a loophole to allow the applicant to continue operations in any event. More loopholes are presented for NSAQMD's participation in this mitigation measure. Words such as "may require bulk sampling at any time" and "may require air monitoring at any time" do not instill much confidence that this ADMP will be effective in controlling Asbestos dust. This mitigation measure must require bulk sampling and air monitoring as a basic part of the ADMP.

Ind 831-31

4.3-7 Mitigation of GHG emissions. There are two parts to this measure. One is to use non-diesel construction equipment to the extent commercially available. This is another loophole for the applicant to employ. This mitigation must include the preparation and approval of a "project equipment use plan" or some allied plan to state the aims of this measure and to allow approval on a case-by-case basis for deviations from the plan. The second part of this measure deals with the GHG construction emissions. The 8 pages of legalese that describe Carbon Offsets are extremely complicated to wade through. The GHG emissions exceed the yearly allowable values because the construction period is constrained to one year.

Additional Mitigation Measures for consideration

Ind 831-32

1.The Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan should be included as a Mitigation Measure to ensure adequate sampling and analyses are performed to minimize Asbestos dust, particulate matter, and fragments of Asbestos and Silica that occur during underground mining operations and then be exhausted to the environment by the headframe ventilation stack.

Ind 831-33

2.The Applicant Proposed Measure (APM) **Air Quality Monitoring** should be included as a Mitigation Measure**.** The measure states: "*Rise Grass Valley Inc. shall coordinate with the Northern Sierra Air Quality Management District to develop an appropriate air pollutant monitoring protocol to install and operate particulate matter monitoring equipment at an upwind and downwind location on the boundaries of the Brunswick and Centennial Industrial Sites.*"

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In the **December 2020** edition of this Air Quality and GHG Emissions report, this Applicant Proposed Measure (APM) was added. However, this APM has not been carried forward to the DEIR or Appendix E-1. This APM will ensure that pollutants that are dispersed into the environment from construction and mining operations will be monitored both before the start of construction and throughout the project timeline. This would be a safeguard to support, modify, or challenge Air Quality measurements and predictions that are currently based on analyses and modeling activities.

(The value of the applicant coordinating with the NSAQMD for additional pollution monitoring stations was verified in a personal communication between William Clark and Sam Longmire of NSAQMD on Feb 4, 2022.)

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INDIVIDUAL LETTER 831: WILLIAM CLARK (2)

Response to Comment Ind 831-1
This is an introductory comment. The commenter's specific comments are addressed below in Responses to Comments Ind 831-2 through 831-33.

Response to Comment Ind 831-2
The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 831-3
The commenter questions why air pollutants from underground blasting and mining were not addressed in the DEIR. However, criteria air pollutants and toxic air contaminants associated with underground blasting and mining were estimated in the DEIR and mitigated where appropriate. Underground blasting and mining does not produce reactive organic gases (ROG) and constitutes a minor proportion of oxides of nitrogen (NO_x) emissions from the project (approximately 15 pounds per day), as depicted in Table 4.3-17 of the DEIR. The project incorporates design features to reduce exhaust from underground equipment, such as the exclusive use of electrically powered equipment underground per APM-AQ-1 (please see Master Response 19– NSAQMD Criteria Pollution Thresholds during Operations).

Asbestos and crystalline silica were accounted for in the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR) and total potential health risk was determined to be less than significant after implementation of mitigation. Notably, Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in Mitigation Measure 4.3-2. The measures of the ADMP reduce the emissions of dust (PM_{10} and $PM_{2.5}$) as well as asbestos. The Health Risk Assessment is based on conservative assumptions, as described in Master Response 22 - Conservatism of Asbestos Assumptions, and Master Response 21 - Conservatism of Silica Assumptions.

Response to Comment Ind 831-4
The commenter asks how the applicant will address emissions of crystalline silica, and states that no analysis, test results or discussion was presented in the DEIR regarding silica health risk. Of note, crystalline silica was included in the emissions inventory incorporated into the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR). As detailed in Master Response 21 - Conservatism of Silica Assumptions, the assumed crystalline silica content and modelling of respirable silica is conservative and overestimates the relevant exposure in any situation. As such, testing of rock from the project site for silica content could not result in a greater silica impact than was already assumed in the DEIR. Crystalline silica has potential chronic health risk values but no acute or cancer risk values have been established. As presented in Table 4.3-21 of the DEIR, the chronic health risk impact, which includes risk from crystalline silica, was determined to be less than significant without incorporation of mitigation. Finally, measures that reduce fugitive dust, such as APM-AQ-2 (Surface Fugitive Dust Controls), will also reduce potential emissions of crystalline silica.

Response to Comment Ind 831-5
The commenter states that the ambient air pollutant monitoring stations and data provided in the DEIR are not representative of the project site. However, the commenter does not suggest any stations that would have data more representative of the project site. Of note, the ambient data

included in Table 2 in Appendix E.1 of the DEIR, and summarized in Table 4.3-4 of Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) of the DEIR, are provided only as context for the existing local ambient air quality and are not used as inputs into the air quality model. Significance determinations, however, are based on comparison to the NSAQMD thresholds, not comparisons to local ambient levels. As discussed on page 4.3-41 of the DEIR, the NSAQMD has established thresholds of significance for CEQA purposes to achieve and maintain the National and California Ambient Air Quality Standards (AAQS). Because an AAQS is based on maximum pollutant levels in outdoor air that would not harm the public's health, and air district thresholds pertain to attainment of the AAQS, a project that complies with the thresholds established by a local air district, such as the NSAQMD, would not result in adverse effects to human health related to criteria pollutant emissions, which were developed based on compliance with the applicable AAQS. Regarding emissions quantification, the DEIR employed industry standard and vetted approaches and quantification equations, such as factors developed by the United States Environmental Protection Agency (EPA) in the AP-42 Compilation of Air Emissions Factors and by the California Air Resources Board (CARB) in the OFFROAD and EMFAC models. The assumptions and factors incorporated in the analysis are detailed in "Method of Analysis" section of Chapter 4.3 of the DEIR, starting on page 4.3-44.

Response to Comment Ind 831-6

The commenter questions the percent reduction validity of the fugitive dust mitigation measures employed in the DEIR. The majority of dust emissions are derived from factors from the Environmental Protection Agency's AP-42 Compilation of Air Emissions Factors and noted in the tables of Appendix E.1. A reduction of dust from vehicle traffic on unpaved access roads and unpaved compaction areas by 55% is based on the California Emissions Estimator Model (CalEEMod) 2016.3.2, which is based on data compiled by the South Coast Air Quality Management District and the *WRAP Fugitive Dust Handbook* (2006). As described in the CalEEMod User's Guide (2017):

> The purpose of CalEEMod is to provide a uniform platform for government agencies, land use planners, and environmental professionals to estimate potential emissions associated with both construction and operational use of land use projects. It is intended that these emission estimates are suitable for quantifying air quality and climate change impacts as part of the preparation of California Environmental Quality Act (CEQA) documents. In addition, individual districts may rely on the model's emission estimates to show compliance with local agency rules.
>
> CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available. Sources of these methodologies and default data include but are not limited to the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (CARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. In addition, some local air districts provided customized values for their default data and existing regulation methodologies for use for projects located in their jurisdictions. When no customized information was provided and no regional differences were defined for local air districts, then state-wide default values were utilized.

Note that reduction of dust of 80% from use of chemical dust suppressants was not applied to vehicle traffic on unpaved access roads during operations for purposes of the air quality analysis and therefore adds significant conservatism to the modelled emissions during operations. Please see Master Response 12 – Chemical Dust Stabilizers for information on the effectiveness and composition of chemical stabilizers.

Response to Comment Ind 831-7

The commenter suggests that Public Safety Power Shutoffs (PSPS) are predictable and that emissions from emergency generators should be accounted for. Given that it is unknown if/ when a PSPS would occur, it is considered a speculative event, and per the CEQA Guidelines, if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). California courts have consistently held that "an EIR is not required to engage in speculation in order to analyze a worst-case scenario." (see Napa Citizens for Honest Government v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 373.). The use of emergency generators is speculative and beyond the reasonable control of the applicant. However, criteria air pollutant emissions associated with 24-hour operation of the emergency generators is provided in Table 4.3-25 of the DEIR on page 4.3-104 for informational disclosure purposes only.

Response to Comment Ind 831-8

The Base Elevation for STCK8, STCK9, STCK10 shown in Table 2 are in feet. The units shown as meters is an error (typo) in the table. This can be verified in the model output files on page 395 of the document where these stacks are shown at elevations of 837.71, 838.72, and 759.39 meters. The correct elevation values were used in the dispersion model. For STCK 8, generators, the gas exit temperature, velocity, and flow rate are based on data provided by the manufacturer of the generators. SLINE1 through SLINE9 are correctly stated in Table 2 according to what was modeled in the HRA. No changes to SLINE1 through SLINE9 are needed.

Response to Comment Ind 831-9

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. The rural dispersion was selected based on the land use procedure as defined by the EPA Guideline on Air Quality Models – Appendix W. As less than 50% of the land within 3 km radius of the project site is categorized as I1 (heavy industrial), I2 (light-moderate industrial), C1 (commercial), R2 (compact residential), and R3 (compact residential), it is appropriate to use the rural option. The terrain characteristics used for the site are the most well-defined in terms of elevation details available within the AERMOD model. As such, the terrain used is accurate and appropriate for the assessment.

Response to Comment Ind 831-10

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. Please also see Response to Comment Ind 831-9 above for a discussion on the terrain characteristics and use of the rural option. It is not appropriate to model the site as urban as discussed above, regardless of Grass Valley becoming more urban. Please see Response to Comment Ind 831-8 regarding the alleged errors in Table 2. Furthermore, the use of the rural dispersion option is conservative compared to urban. To account for the dispersive nature of the "convective-like" boundary layer that forms during nighttime conditions due to the urban heat island effect, AERMOD enhances the turbulence for urban nighttime conditions over that which is expected in the adjacent rural, stable boundary layer, and also defines an urban boundary layer height to account for limited mixing that may occur under these conditions. The magnitude of the urban heat island effect is driven by the urban-rural temperature difference that develops at night.

Response to Comment Ind 831-11

The commenter questions why solar energy was not proposed to mitigate energy consumption of the project and points to the Nevada County Energy Action Plan (EAP) reduction goals. The project does not have a significant impact with regard to energy use; therefore, mitigation is not

required. Regarding a solar energy system, while solar panels are not currently proposed as part of the project, the roof space of the project buildings may be available in the future for installation of solar panels to reduce the project's reliance on the energy grid. However, any such solar power generation would be small in comparison to the requirements of the project. Notably, the GHG emissions presented in the DEIR are conservative, since California regulations will reduce GHG emissions over time. For instance, Senate Bill 100 requires that zero carbon energy resources supply 100% of electric retail sales to customers by 2045. Neither this requirement, nor the progressive steps to achieve it (i.e., 44% of electricity by 2024, 52% by 2027, and 60% by 2030 be procured from renewable energy sources) were accounted for in the GHG analysis. Further, compliance of the project with EAP strategies has been analyzed in Table 4.3-22 in the DEIR and was determined to be consistent with the EAP. Please see also Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Ind 831-12

The commenter suggests that GHGs associated with the manufacture of cement should have been included in the DEIR. This comment pertains to a "lifecycle" analysis, which is not required under CEQA. Please see Master Response 26 – Life Cycle GHG emissions.

Response to Comment Ind 831-13

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Notably, the DEIR is based on the most recent Air Quality and GHG Report (dated November 2021) included as Appendix E.1 of the DEIR. Draft versions of this report created before the issuance of the DEIR are not relevant to the analysis.

The commenter states that the DEIR does not discuss ventilation controls, filtration, or other methods used to mitigate exposure of workers or the public to asbestos. However, Chapter 4.3 and Appendix E.1 and E.2 of the DEIR provides extensive discussion and analysis of these issues. Also see Master Response 21 - Conservatism of Silica Assumptions and Master Response 22 - Conservatism of Asbestos Assumptions. The efficiency of proposed underground filtration, including evidence of effectiveness, is provided on page 10 of Appendix E.2. Also see Response to Comments 8-133 and 8-151 in CEA letter #1.

Response to Comment Ind 831-14

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Please see Response to Comment Ind 831-13 above.

Mitigation Measure 4.3-2 of the DEIR requires the submission of an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The prior draft of the Air Quality and GHG report included different measures, but these were removed because the same emissions impacts are reduced by the ADMP requirement.

Response to Comment Ind 831-15

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report. Please see Response to Comment Ind 831-13 above.

The Health Risk Assessment included in the DEIR uses TEM testing which is discussed in detail in Chapter 4.3 and Appendix E.1 and E.2 of the DEIR. Also see Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 831-16

The commenter identifies differences between the analysis in the DEIR and a draft version of the Air Quality and GHG Report and questions the efficiency of proposed air filtration proposed in the ASUR Plan. Please see Response to Comment Ind 831-13 above.

Response to Comment Ind 831-17

The dispersion model in the Health Risk Assessment used the most appropriate data for the HRA. Please see Master Response 17 - Meteorological Data Used in HRA. In addition, as shown in the Master Response, the prevailing wind direction in Grass Valley is from the northeast. The meteorological data includes six years of data, 24 hours per day, 365 days per year, which includes periods of calm. As such, periods of very stable air as indicated by the commenter would have been accounted for in the meteorological data used in the HRA. The discussion regarding meteorological data in the HRA report discussed the nearest stations available for use in modeling and how they differ compared to the windrose in Grass Valley. This is discussed in more detail in Master Response 17 - Meteorological Data Used in HRA.

Response to Comment Ind 831-18

This comment is a duplicate of Comment Ind 831-4. Please see Response to Comment Ind 831-4.

Response to Comment Ind 831-19

This comment is a duplicate of Comment Ind 831-5. Please see Response to Comment Ind 831-5.

Response to Comment Ind 831-20

The commenter asserts that the Project Applicant should be required to disclose the project's plans to comply with the California Executive Order (EO) N-79-20, which establishes a Statewide goal that 100 percent of in-state vehicle sales of new passenger cars and trucks shall be zero-emission by the year 2035. The applicant, as well as everyone in California, will purchase vehicles that are available at the time of that future transaction, which will meet the standards that are required based on the date of manufacture. However, as technology and fleet turnover for passenger cars and trucks transitions to cleaner battery-electric vehicles over time, GHGs in the state will reduce proportionally, which will also result in reductions in the GHGs presented in the DEIR for the project.

Response to Comment Ind 831-21

The commenter asks about the various ventilation fans proposed for the project. The project includes 3 main ventilation fans, 2 booster ventilation fans, and 10 auxiliary ventilation fans. All fans would be located underground once the service shaft is constructed. The fans will be sized and placed as needed to provide ventilation flows throughout the mine. These specifications will change depending on where mining is taking place. The engineering details of the ventilation fans is not necessary for an EIR. (Dry Creek Citizens Coalition v. County of Tulare (1999) 70 Cal.App.4th 20, 26.)

Response to Comment Ind 831-22

This comment is a duplicate of Comment Ind 831-6. Please see Response to Comment Ind 831-6.

Response to Comment Ind 831-23

The commenter questions how the applicant will ensure the use of Tier 4 equipment and whether dispersion modeling was performed for Tier 3 equipment. The project analysis incorporates



applicant proposed measures (APMs) that serve to reduce project emissions of criteria air pollutants and toxic air contaminants, including APM-AQ-1 that states "all off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines" (DEIR page 4.3-65). APMs are mandatory conditions of approval and are enforceable by the County. Please see Master Response 3 – Operator Responsibility.

Regarding construction contractors, Mitigation Measure 4-3-1(b) requires a Construction Exhaust Emissions Minimization Plan and the use of Tier 4 Final engines or alternative sources of power. As such, use of Tier 4 engines or alternative sources of power are required even for contractors. The mitigated emissions presented in the Air Quality Analysis of the DEIR reflect the lower emissions that would be achieved by this mitigation measure. A comparison of mitigated and unmitigated emissions of criteria air pollutants and risk from toxic air contaminant exposure is already provided in the DEIR (see Tables 4.3-17, 4.3-19, and 4.3-21) and may be reviewed by the commenter to understand the consequences of using lower tier engines during construction.

Response to Comment Ind 831-24

The commenter expresses concerns that asbestos, silica, and heavy metals are "estimates of estimates". Given that asbestos, silica, and heavy metals are part of the fraction of fugitive dust considered PM_{10} (particulate matter with an aerodynamic diameter less than or equal to 10 microns), the potential mass of these toxic air contaminants needs to be estimated based on the individual proportions therein. This is standard industry practice. The assumptions used to estimate PM_{10}, asbestos, silica, and metals are provided in Appendix E.1 of the DEIR. Please also see Master Response 21 - Conservatism of Silica Assumptions, Master Response 20 - Conservatism of Metals Assumptions, and Master Response 22 - Conservatism of Asbestos Assumptions.

Response to Comment Ind 831-25

This comment is a duplicate of Comment Ind 831-7. Please see Response to Comment Ind 831-7.

Response to Comment Ind 831-26

This comment is a duplicate of Comments Ind 831-13 and 831-14. Please refer to these responses.

Response to Comment Ind 831-27

This comment is a duplicate of Comment Ind 831-15. Please see Response to Comment Ind 831-15.

Response to Comment Ind 831-28

This comment is a duplicate of Comment Ind 831-16. Please see Response to Comment Ind 831-16.

Response to Comment Ind 831-29

The commenter asserts that Mitigation Measures 4.3-1(a) and 4.3-1(b) do not contain adequate descriptions of plans, monitoring, enforcement mechanisms, and also that loopholes are provided for use of Tier 4 engines. Contrary to commenter's assertion, sufficient detail is provided in Mitigation Measures 4.3-1(a) and 4.3-1(b) to allow for enforcement, and development of any required subsequent plans (such as a Construction Exhaust Emissions Minimization Plan). A mitigation monitoring and reporting plan is included as part of the FEIR (Chapter 4), and will be used by the County to enforce all mitigation measures and conditions of approval. Please see Response to Comment Ind 831-23 regarding the alleged loophole in use of Tier 4 engines.

Response to Comment Ind 831-30

The commenter asserts that there are "loopholes" in the Asbestos Dust Mitigation Plan (ADMP). Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to NSAQMD for review and approval and is directly transcribed from the *Asbestos Dust Mitigation Plan Guidelines* (2004) provided by the NSAQMD as "a template for an approvable ADMP". The NSAQMD is responsible for enforcing the ADMP, and the NSAQMD has authority over whether air monitoring will be required.

Response to Comment Ind 831-31

The commenter asserts that Mitigation Measure 4.3-7(a) includes a loophole because it only requires the use of electrical or alternative fueled construction equipment "where feasible." This is a standard GHG mitigation measure used to help reduce GHG emissions through use of available non-diesel technology. However, the availability of non-diesel construction equipment is a changing landscape, so it would be infeasible to require the mine operator to use all non-diesel equipment, when such equipment may not yet be commercially available. Moreover, the mitigated GHG emissions presented in the DEIR did not assume any specific reductions based on this general requirement to use non-diesel equipment when feasible, so the DEIR presents a conservative analysis (see pages 131 through 136 of Appendix E.1 of the DEIR). The commenter also asserts that Mitigation Measure 4.3-7(b) is too long and complicated. The carbon offset requirement in Mitigation Measure 4.3-7(b) needs to contain this level of detail to comply with legal precedent from California Courts, and to ensure that the mitigation measure is effective in mitigating impacts. The commenter notes that the GHG emissions for construction exceed the GHG constructions emissions thresholds because the construction period is constrained to one year. To provide the most conservative estimate of project construction emissions, many construction tasks were assumed to occur simultaneously, while in reality, they may be performed in sequence. Please see Master Response 24 - Project Construction Schedule.

Response to Comment Ind 831-32

The commenter asserts that the ASUR Plan should be included as a mitigation measure. The ASUR Plan is included as APM-AQ-3 in the DEIR and is required as a condition of approval of the project, which means that the County will have enforcement authority similar to a mitigation measure. In addition, Mitigation Measure 4.3-2 of the DEIR requires the submission of an ADMP to the NSAQMD for review and approval. Components of the ASUR Plan will become part of the approved ADMP and other components will be used as company policy and procedures to assist with compliance with the ADMP.

Response to Comment Ind 831-33

This comment is a duplicate of Comment Ind 831-14. Please see Response to Comment Ind 831-14.

Individual Letter 832

County of Nevada
Nevada County Planning Department
950 Maidu Avenue, Suite 170
Nevada City, CA 95959-8617

March 29, 2022

To: Matt Kelley, Senior Planner

Subject: Comments on the Idaho-Maryland Mine Project DEIR Appendix E-2

Comments submitted by William Clark
324 Vistamont Dr.
Grass Valley, Ca. 95945

DEIR Document

Appendix E-2: Asbestos, Serpentinite, and Ultramafic Rock (ASUR) Management Plan

SUMMARY

With respect to Air Quality concerns, the IMM project design has undergone a series of evolutions as described in earlier editions of Air Quality technical reports. Unfortunately, design modifications, changes, and updates have not been presented in a manner that is transparent to a reviewer to understand and critique the evolving design and environmental impacts. The following comments identify specifics of the IMM design as described in the Appendix E-2 and also question some changes and omissions that have been carried forward to the current document.

Without additional information and supporting analyses for key elements of this report, this reviewer cannot declare the ASUR Plan to be both adequate and representative of a final project design with respect to minimizing Asbestos contamination.

Direct quotes are presented in Italics. In certain instances, information from earlier "editions' of Air Quality reports are included to illuminate areas in question and this information is in indented text.

Ind 832-1

QUALIFICATIONS

William Clark is a 21year resident of Grass Valley and a retired Aerospace Engineer with a Masters Degree in Systems Analysis/Electrical Engineering. His experience has been in all aspects of Systems Analysis, Systems Integration, Modeling and Design for Avionic systems and Spacecraft. He has conducted and supported Design Reviews in response to proposals from Military, Scientific, Commercial, and NASA customers.

Ind 832-2

Mr. Clark also served several terms as a member of the Nevada County Civil Grand Jury and was involved in the analysis and publication of a report on the Air Quality in Nevada County (2003).

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Appendix E-2, ASUR Management Plan November 2021

COMMENTS

Page 4, Section 4.0 - Overview
Page 7, Section 5.0 - Testing
Appendix C - Sampling

Ind 832-3

Comment: Rise owns 2,585 acres of sub-surface mineral rights and has only completed 19 exploration drill holes over a two-year period. Samples were taken from 6 of the 19 total cores drilled. It appears that the acreage within the mineral rights was undersampled in terms of surveying possible areas containing Asbestos. And sampling 32% of the cores drilled seems a paltry sum to claim the mining project is largely Asbestos free. These facts are coupled with the lack of discussion of why this sampling program was chosen to assess the distribution of ore that contains Asbestos.

Question: Given that Asbestos is a widely recognized toxic element and given that Rise had two years to survey and drill, what is the reason that a more robust sampling program was not undertaken? Will there be additional data presented in the EIR to justify this sampling approach?

Page 5, Section 4.1.2

"To provide access to the gold mineralization, an extensive network of tunnels and raises will be constructed throughout the life of the mine. These tunnels are constructed in the nonmineralized rock which, at the mine, is typically meta-andesite volcanic rock. The tunnels are constructed in 10-foot advances per blast (a "round"). Parallel holes are drilled into the rock face, loaded with explosives, and then detonated to fragment the rock. The broken rock is moved to the surface, the tunnel is supported with rock bolts and screen, and then the process starts again to continue advancing the tunnel. A number of tunnels will be under construction throughout the mine area at all times during the life of the mine.

Ind 832-4

New underground tunnels and raises will be created as necessary to access gold-quartz veins or provide the necessary underground infrastructure to transport rock and provide ventilation and escape routes.

Mine development in nonmineralized "barren" rock (i.e., nongold bearing) is expected to result in the production of approximately 500 tons per day (182,500 tons per year) of barren rock. The barren rock will be transported from the tunnel face to the mine shaft (using electric powered load/haul/dump vehicles, rail cars, and/or conveyors) to underground rock bins located adjacent to the shaft. The rock will then be loaded into the shaft skips, hoisted to the surface, and dropped into one of the compartments of the concrete silo located on the surface. The barren rock will then be transported by trucks on the surface for user as engineered fill."

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Page 5, Section 4.1.3
"Gold mineralization production through tunneling and long-hole blasting produces 1,000 tons per day (365,000 tons per year) of mineralized material. Approximately 50 percent of the mineralization will be returned to the underground mine as backfill after processing and the remainder of the sand tailings will be used for engineered fill."

Comment: For tunneling, I assume the tunnels will be of the order of 7 feet by 8 feet or 56 sq feet in area. Then each "round" of 10 feet into the rock will result in 560 cubic feet of broken rock. Assuming a nominal density of rock, that amounts to 90,720 pounds of rock, or 45.36 tons per "round". Using those numbers, it will take 11 "rounds" to produce 500 tons of barren rock. This would be the result of one 12 hour shift. The 500 tons will be hoisted up into the silo to wait for another 500 tons of barren rock produced somewhere else in the mine to be hoisted up. At this point, someone will take 3 "grabs" of rock for PLM/TEM testing before the rock is sent off on a truck. This is a possible scenario which attempts to put some real world data into the ASUR sampling Plan. The Plan fails to state how long the two tests will take – the testing itself is not instantaneous and no time span has been presented for the testing period.

For mineralization production, the time scale would be somewhat different but the questions are the same. The EIR must have a more definitive presentation of each step in this testing process.

Question: Does the 1000 tons of rock sit in the silo until the decision is made whether to send the rock to be used as Engineered Fill or to sequester the rock somewhere else? What about the next load of 500 tons coming up the shaft from some other tunnel in the mine? Who is the "Traffic Cop" in this process? Will the EIR have a more definitive presentation of this process?

Page 8, Section 6.0
Comment: This section lists several "plans" that include the following:
Engineered Fill Placement Plan, Mine Plan and, Operational Plan. None of these plans is discussed in detail, no authors are identified, and no approval mechanism or enforcement process is described.

"An Asbestos inventory of all mined materials will be maintained and include a current 3-month rolling average of Asbestos content in equivalent PCM units." There is no discussion or analyses presented that defends the use of a 3-month rolling average of Asbestos content. There is no information regarding the benefits of using such an average for this toxic element. This scheme uses monthly averages of Asbestos averages from the testing process in the silo. At 1000 tons of rock per day, many, many tons of rock go by before an average is calculated.

Ind 832-5

Question: Will above plans be described further in the EIR? Will a time frame be presented for the review and approval process of each plan? Will the EIR include information that explains the details of using the 3-month rolling average of Asbestos content? What are the benefits of using this type of averaging? Will the test results of this "bulk sampling" be used to determine the fate of each 1000 ton batch of rock?

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Page 14, Section 8.1
"7. Records of all analytical test work conducted will be retained for the life of the operation or a minimum of 7 years."

Ind 832-6

Comment: Given the toxicity of Asbestos, records of all analytical test work must be retained for the life of the project operation.

Question: Will the EIR specify that such records must be retained for the life of the project operation?

NOTE: The following material has not been included in the DEIR. It is important that the Nevada County Lead Agency be aware of this information that spotlights the deficiencies of the DEIR and the ASUR Plan. The final EIR must address this information to allow residents of Nevada County to fully appreciate how the IMM project will affect their lives.

Air Quality & GHG Emissions Analysis & Technical Report – MARCH 2021

Pages 32-33, Section 2.4.2.4 Health Risk Assessment

Ind 832-7

> *"The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60% silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to exclude asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced by the project (Rise Grass Valley Inc. 2021). The ASUR plan also is designed to prevent the emission of dust from the underground mine which contains asbestos. For conservatism in the modelling of TAC emissions, the materials mined and engineered fill are assumed to be composed of 1% serpentinite with an asbestos content of 0.25%, which is the detection limit for the bulk asbestos testing proposed in the ASUR plan. The average asbestos content of the total mined material, assumed at 0.0025%, is of primary concern since asbestos does not have established acute noncancer effects (OEHHA 2020). Therefore, only the average asbestos emissions that could be generated over the long-term (per year), and associated long-term health risk, has been evaluated herein. However, it should be noted that since mine operations would be required to comply with MSHA PELs that protect underground workers from asbestos fiber exposure during short-term shifts, this compliance would also result in limiting potential emissions of asbestos aboveground from the shaft in general."*

Comment: In the **March 2021** edition of the report the Asbestos content is assumed to be 0.0025%. In the **December 2020** edition the value was 0.0108% based on lab results, not assumptions. There are no analyses presented to validate this assumption. There are no analyses or test results presented that justify assigning a value of 0.25% just because that is the detection limit for bulk testing. It is recognized that TEM testing is many times more sensitive to bulk

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testing yet this test method is not discussed here. Health Risk predictions must be called to question until this discrepancy is resolved. This Health Risk assessment must be repeated before the IMM project can proceed.

It is possible that these contradictions are the result of new and better data and/or analyses and the data presented in the DEIR and ASUR Plan represent the current project assessment. But without a paper trail, results of current analyses, or other explanations, this may be entirely speculative.

Question: What is the explanation for this major discrepancy? What assurances can the applicant provide that measurement methodologies will be accurate?

> *"Blasting and crushing would also result in emissions of dust with trace heavy metal TACs including arsenic, beryllium, cadmium, copper, lead, manganese, mercury, nickel, selenium, and vanadium. Concentrations of each heavy metal within the barren and mineralized rock was taken from Table 4-7 of the Groundwater Hydrology and Water Quality Analysis Report for the Idaho-Maryland Mine Project (EMKO Environmental, Inc. 2020). Based on the PM10 emissions estimated, emissions of asbestos, silica, and heavy metals were estimated for purposes of the health risk modeling. As described in the ASUR Plan, the project would employ ventilation engineering controls systems for all mine headings where tunneling is taking place in serpentinite containing asbestos. The engineering controls will be designed to prevent asbestos fibers from exhausting from tunneling areas into the main ventilation system of the underground mine and consequently from being exhausted from the underground mine to surface. Engineering controls would include air filtration designed to remove 95% of asbestos fibers. Other emissions of TACs from blasting pertain to the combustion of ANFO, which were estimated based on emission factors from AB 2588 Combustion Emission Factors (Ventura County Air Pollution Control District 2001)."*

Ind 832-8

Comment: In the **December 2020** edition of this report, engineering controls would be employed to remove 90% of asbestos fibers. The ASUR Plan states that filtration systems will remove 95% of asbestos fibers. However, there are no analyses or test results or demonstrated methods presented that validate either of these values. If this report is correct, 5% of asbestos fibers will exhaust via the headframe ventilation stack to the surrounding environment and will be spread around by the prevailing winds.

The ASUR Plan states that MERV-16 filters will be employed to filter 95% of fugitive Asbestos dust and fibers in the tunnels and stopes of the mine. An on-line source for MERV-16 filters states that the filters will filter 90% of particulate matter. It is not clear from the above discussion how these filters will filter to the 95% level.

Question: How will this contradiction be resolved? Will the applicant present test results to defend the capabilities of the MERV-16 filters? How will the remaining 5% of asbestos fibers be prevented from exhausting to the surrounding environment by the headframe ventilation stack?

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INDIVIDUAL LETTER 832: WILLIAM CLARK (3)

Response to Comment Ind 832-1

This is an introductory comment. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. Comment noted.

Response to Comment Ind 832-2

The County acknowledges the comment as background information about the commenter. Comment noted.

Response to Comment Ind 832-3

The commenter questions the sampling approach conducted by the applicant. Rise completed 19 exploration drill core holes, totaling 67,500 linear feet, from 2017-2019. Exploration drilling was designed to test a variety of mineralization throughput the deposit in areas where mining is expected to occur. Notably, prior to underground gold mining, intensive planning efforts will be required to meet state and federal regulations and achieve safety, environmental, and economic goals. Underground mine planning includes exploratory drilling, geologic mapping, material logging, and testing of additional material before mining in a given area commences. These same processes also ensure future mining operations avoid and manage rock types that may contain naturally occurring asbestos. Please see Section 6.0 of the ASUR Plan (Appendix E.2 of the EIR).

Regarding asbestos health risk, the Health Risk Assessment prepared for the project (see Appendix E.1 of the DEIR) is based on conservative assumptions, as described in Master Response 22 – Conservatism used for Asbestos Assessment. However, as described in the DEIR on page 4.3-80:

> Pursuant to the CARB ATCM for Construction, Grading, Quarrying and Surface Mining Operations, an ADMP is required to be submitted to the NSAQMD for any project with greater than one acre of surface disturbance if any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock or if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined by the owner/operator or the Air Pollution Control Officer. Because asbestos was found to be present in some of the underground mining material samples that Rise Grass Valley Inc. sent for laboratory analysis, an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.

The DEIR concluded that the project could result in a significant impact with respect to exposing receptors to substantial concentrations of asbestos and required preparation of an ADMP per Mitigation Measure 4.3-2 to reduce the impact to a less than significant level. The ADMP has minimum requirements as described in the mitigation measure. Additional measures, such as air monitoring if required by the NSAQMD, would be detailed in the ADMP. The NSAQMD may revise the ADMP on the basis of air monitoring. Compliance with the CARB ATCMs for naturally occurring asbestos, including development of an ADMP, is the standard approach within CEQA documents to address health concerns associated with exposure to asbestos from unpaved surfaces, construction and grading operations and quarries where asbestos is found or likely to be found in order to ensure potential health risk impacts to the public would be minimized to a less than significant impact. Multiple other projects in the NSAQMD jurisdiction, as well as throughout the state, have relied upon compliance with these naturally occurring asbestos ATCMs in order to control any potential asbestos emissions to the extent possible. As described in Mitigation Measure 4.3-2 of the DEIR, the proposed project shall also comply with all applicable criteria in the CARB ATCMs for naturally occurring asbestos.

In summary, the sampling conducted by Rise will continue to occur prior to, and during, underground gold mining as part of the rigorous mine planning to meet state and federal regulations and any potential asbestos emissions will be minimized through implementation of the ADMP, as described in Mitigation Measure 4.3-2.

Response to Comment Ind 832-4

The commenter questions the efficacy of asbestos testing described in the ASUR Plan based on the mass of rock generated during underground mining. Two methods of asbestos testing (PLM and TEM) are required under the ASUR Plan. PLM testing is required to comply with the Asbestos ATCM for Surfacing and trucks may not transport material without a receipt based on the PLM results. Accordingly, in response to the commenter's question about timing, the PLM testing would be conducted prior to transport of rock material from the site. Any materials with detectable asbestos would not be allowed to be used for surfacing. Barren rock and mineralized rock would be analyzed separately in order to allow the issuance of the required receipt. Barren and mineralized rock are placed in different bins of the silo. The Engineered Fill Placement (EFP) Plan (Section 8.5 of the ASUR Plan) will include schedules and planned material placement locations and haul roads. The EFP Plan will be designed to ensure that Asbestos Containing Material is not used for surfacing. The EFP Plan will designate areas which are suitable for the placement of Asbestos Containing Material and maintain an estimate of the capacity of these areas.

The purpose of TEM testing in the ASUR Plan is not to control the fate of the rock and tailings after it reaches the surface (that is the purpose of the PLM testing, as described above). The Asbestos Inventory (Section 8.3 of the ASUR Plan) based on asbestos content, using TEM testing, is to verify that mine planning is effectively minimizing the potential for public exposure to airborne asbestos from the project.

Response to Comment Ind 832-5

The plans referred to by the commenter are internal plans of the project operators, which are utilized to ensure compliance with the Asbestos Dust Mitigation Plan required for the project. As discussed on page 4.3-61 of the DEIR, the average asbestos content of the total mined material is of primary concern given that asbestos does not have established acute noncancer effects. Health risk from asbestos is calculated on an annual average exposure. Therefore, the assumption of a 3-month rolling average in the ASUR Plan is conservative. However, it should also be noted that the CARB ATCMs that pertain to naturally occurring asbestos are the overarching regulations with which the project is required to comply. The ASUR Plan was developed to be consistent with the ATCMs; however, the ASUR Plan does not supersede requirements contained within the ATCMs.

Response to Comment Ind 832-6

The commenter asserts that asbestos testing records described in the ASUR Plan should be retained for the life of the project. Of importance, the ASUR Plan is intended to reflect the requirements of the CARB ATCMs that were attached to the ASUR Plan and the project would retain records pursuant to these ATCM requirements, as follows:

Section (e)(5)(A) of the Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations requires the maintenance of certain records (including air monitoring) for 7 years following the completion of construction or grading operations. Section (f)(5)(A) of the ATCM requires the owner/operator of a surface mining or quarrying operation to maintain certain records (including air monitoring) for at least 7 years.

Section (e) of the Asbestos ACTM for Surfacing requires receipts (verifying the asbestos content) to be retained for a minimum period of seven years from the date of supply or use of the material.

Response to Comment Ind 832-7

This comment is a duplicate of Comment 15 in Individual Letter 831. See Response to Comment Ind 831-15.

Response to Comment Ind 832-8

This comment is duplicate of Comment 16 in Individual Letter 831. See Response to Comment Ind 831-16.

Individual Letter 833



Matt Kelly, Senior Planner
Nevada County Planning Department

3-30-2022

RE: Idaho-Maryland Mine Project DEIR
Rise Gold Grass Valley, Ca request for Rezoning, Use Permit, Reclamation Plan

To whom it may concern:

Ind 833-1 My wife and I have lived in western Nevada County for the the past 41 years and have taught in our local schools. We have raised our family here, our kids went to school here, and they have moved back here to live and work in our community and enjoy our Sierra mountain communities. We have seen and read about the failure of many mining projects, both in the past decades and historically. These mining projects left major environmental damage behind, both above and below ground.

The Draft EIR seems to be a well written document with many pages of information that rely on speculations and assumptions. The hypothetical charts, graphs, and computer models seem nice, but they are just speculative guesses.

Ind 833-2 The environmental areas are just incomplete in many areas, such as:
*Air quality: which is currently poor to fair in our area because of the high ozone up from Sacramento and the smoke from the fires. The mining equipment, especially the large truck traffic and heavy mining equipment will make it worse.

Ind 833-3 * Water quality: The EIR is low on testing results and very quiet on the damage that will be caused by 100s of millions of gallons of water being pumped out of the mine, and during a drought right now. Also, what is going to happen to the underground geology with the loss of this stabilizing water and loss of water to surface wells? The EIR is very quiet on mitigation surrounding this topic.

Ind 833-4 * Hazardous materials: These are a major problem. Take the materials such as very dangerous explosives and extraction chemicals. If there were any spillage or accidents, (which seem to happen with these operations), there will be not only pollution to waterways, but a very high risk factor to surface real estate. The mine has no buffer zone around its perimeter.

Ind 833-5 *Other problems: such as hazardous rock materials and the excessive 100+ trips a day of large trucks and other large industrial equipment used to move massive amounts of toxic and non toxic rock material. The truck transportation issue alone will cause damage to roads and create excessive exhaust pollution, dust and noise. These are just a few of the high environmental impact items that a mine brings with its daily operations. The EIR is very short on any written mitigations solutions to these impacts.

Ind 833-6 Unfortunately, when Ben Mossman, President of Rise Gold, states that the EIR speaks for itself, and states that there are "no significant impacts" (The Union, March 22, 2022), we have a huge problem. As we see it, the number one problem with the Rise Gold holdings of 190 surface acres that allow entry to the Idaho Maryland mine and the footprint of the 2585 acres of mineral rights that came with it, hold hostage and impact

the above ground developed real estate found within this acreage, which is worth100s of million dollars. This is just wrong for all of us.

Ind 833-7

As we know from past observation of our local mining history, the mining industry created toxic and hazardous mining remains throughout our county. An in-town mine, located between our two wonderful cities, will bring great risks and profound environmental damage to the central section of our communities that we live in with critical infrastructure that shouldn't be compromised. We should be very concerned about this potential environmental and economic disaster for western Nevada County.

Ind 833-8

The Board of Supervisors need to VOTE NO to any form of use permits to these types of risky projects. VOTE NO to any form of dewatering of our ground water reserves, especial during a drought, and VOTE NO on zoning changes. PLEASE stop the hostage taking of developed real estate by these dangerous and archaic mineral rights, that seem to be shopped around to be exploited by questionable mining ventures. It is time to stop this hostile business practice. The mineral rights need to be purchased by Nevada County or some nonprofit to stop this endless cycle. We need to protect our community from these present and future mining proposals, which bring major risk to our environment and quality of life.

Sincerely,

William and Linda Culbertson
14553 Echo Ridge Drive
Nevada City, Ca 95959
530 205 7138

INDIVIDUAL LETTER 833: WILLIAM AND LINDA CULBERTSON

Response to Comment Ind 833-1
The comment is an introductory statement that does not identify any specific concerns or inadequacies in the DEIR.

Response to Comment Ind 833-2
Please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, for further information related to air quality, including impacts related to ozone (ROG and NO_X) and smoke (particulate matter).

Response to Comment Ind 833-3
Please refer to Chapter 4.8, Hydrology and Water Quality, for additional information related to groundwater and wells. Additionally, see Master Response 14 – Adequacy of Groundwater Model, Master Response 15 – Adequacy of Groundwater Monitoring Wells, and Master Response 29 – Near Surface Workings.

Response to Comment Ind 833-4
Please refer to Chapter 4.7, Hazards and Hazardous Materials, and Master Response 10 – Explosives, Reagents, and Brunswick Fill, for additional information related to the use of explosives and extraction chemicals.

Response to Comment Ind 833-5
Regarding hazardous rock materials concerns, please see Master Response 8 – Mine Waste Characterization. Regarding truck trips concerns, the DEIR analyzes impacts to pavement in Chapter 4.12. Specifically, the DEIR requires the Project Applicant to enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impacts to pavement. (DEIR, Mitigation Measure 4.12-6(b).) Regarding truck exhaust pollution, the DEIR's health risk assessment analyzed dust, criteria air pollutants, toxic air contaminants, and GHGs. The DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment specifically addresses health impacts to children. The commenter is referred to Master Response 18 – Air Quality Thresholds. Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level.

Response to Comment Ind 833-6
Please see Master Response 7 – Location of Future Mining Areas.

Response to Comment Ind 833-7

The comment lists several general concerns related to mining; however, the level of detail provided is insufficient to allow for a detailed response. The commenter's concerns have been noted for the record.

Response to Comment Ind 833-8

The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 834

From: yardcard@usamedia.tv
Sent: Saturday, April 2, 2022 1:33 PM
To: Idaho MMEIR
Subject: the Mine

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Dear Nevada County Planning Commission,

Ind 834-1 I have had health complications from ozone and smoke in Nevada County the last 10 years. I am very concerned about the potential air pollution from the mine that will make my health problems worse. Please do not approve this project !!!

Sincerely, William Hall (33 year resident of Nevada County)

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INDIVIDUAL LETTER 834: WILLIAM HALL

Response to Comment Ind 834-1

Regarding health concerns, the DEIR evaluated diesel exhaust, silica, asbestos, and heavy metals and the related impacts were found to be less than significant after mitigation. (DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy).) The health risk assessment (HRA) provides the health risk at the maximally exposed individual resident (MEIR) and has determined the health impact at the MEIR is less than significant. Prevailing wind speed and direction were accounted for in the HRA to determine where and how far emissions from the project would travel. (Appendix E.1 of the DEIR.) As stated on page 27 of the HRA (Appendix E.1 of the DEIR), the MEIR would be the nearest existing residence to the north of the Brunswick Industrial Site. Emissions would be dispersed as distance increases from the emission source. Since the HRA presents the health risk levels at the maximally exposed individual, all other receptors in the vicinity of the project would have less exposure and consequently less potential health risk than the MEIR.

Individual Letter 835

To: Matt Kelley, Senior Planner
Re: Idaho Maryland Mine – Rise Gold, Grass Valley
Fr: William Heck, Homeowner, **13641 Greenhorn Road**, within the mineral rights zone

March 20, 2022

Dear Mr. Kelly -

Ind 835-1 I have lived here in Nevada County since 1980, and at this Greenhorn address since 1996. During that time, I have enjoyed the quality of life that comes with rural Northern California living. Our "country quiet" is rich with frog croaks and bird song, coyote howls and the calls of red-tailed hawks. My days are filled with gardening and caretaking our property, which my family share with all manner of California wildlife. I am writing to share my concerns about the draft EIR.

Water Quality Impacts to Neighborhoods.

My well does not appear on the Applicant's map of wells. My well was drilled in 1981 by a private person who either did not know to report it or simply did not report. How many other wells may be unaccounted for?

Ind 835-2
- Please require the Applicant to conduct a door to door, parcel by parcel inquiry to obtain an accurate count of the number of wells within the mineral rights area and within 1,000 feet of the mineral rights area. I believe a door to door survey may have been a condition of approval for the EmGold project,20 years ago. This may be the only way to obtain an accurate count of the number of wells in the project area.
    - I would like to have analysis done on the impacts to private wells beyond the scope of the boundaries the project proponent has drawn. Aquifers do not necessarily follow property lines. I believe the scope of potential water contamination may be far greater than is currently considered.

Ind 835-3
- Should wells beyond the scope of the project become compromised or contaminated, Rise would need to extend NID system lines well beyond their current E. Bennet area to serve those households. I know the costs of connecting to NID is substantial, and would need to include actual hookups to each home paid for by Rise, and 80 years' worth of water payments to NID, including any costs in the raise in rates that are likely to occur over the term of the operations.

Ind 835-4
- Rise should pay the cost of testing the potability of each well identified in the EIR for its current potability, mineral and metal content before any dewatering can be approved. Then they should be required to take post dewatering samples each year of operations to determine the impacts to the wells.

Ind 835-5
- At what levels of contamination or change in water quality would be mandated for Rise to take action for private well owners, how will that be defined? Please include a definition of "contamination".
- Our well has produced sparkling clear, pure water since it was drilled, about 1981. That well is my only source of water. It has performed beautifully and reliably for my family and gardens for over 40 years.

Noise.

Ind 835-6 One of the things I love most about living on my land is the quiet. Rise Gold has said that noise would not affect people more than half a mile from the mine. They did this in a letter sent to residents, which had been written by Ben Mossman, Rise Gold's president and CEO. This is untrue. I am able to hear train whistles and track noise from the town of Colfax, and that is 12 miles away from our house. Noise and traffic from the mine site would be steady and grueling throughout the day and night. Not only that, but given the nature of our local terrain, the mine and traffic noise would be channeled directly up to my neighborhood as though it wore being broadcast through a megaphone.



Ind 835-7

Traffic and Fire Evacuation.

- I did not see any mention of fire evacuation routes in the Traffic Impact Analysis Appendix.
- The Greenhorn, E. Bennett, and Brunswick areas are known severe high fire areas and its residents have very few options for fire evacuation.
- The information in the DEIR with regard to evacuation routes was simply a cut and paste exercise of existing general plan, OES, and Cal Fire evacuation protocols. I did not see any efforts to discuss how the hundreds of employees and the vehicles and trucks would impact the community in the event of an evacuation.
- There is nothing that addressed the impact of the large trucks driving on our small, local roads. Large trucks already have to crowd the center of the road along the same routes the mine trucks would drive, in order to keep their tires off the fog lines at the edges of these small lanes. This becomes a greater problem when large trucks are hauling trailers. Local traffic is negatively impacted, and roads are worn out much more quickly.
- Please require an in-depth analysis of specific impacts of increased load due to the mining operations.

Ind 835-8

Hydropower Generation.

- Rise Gold has not applied for a Federal Energy Regulatory Commission (FERC) license, nor is power generation mentioned in the DEIR. This can be a years-long process, just by itself.
- Rise Gold has not completed the required California Environmental Quality Act (CEQA) document for this project.
- Rise Gold has not begun communications with either PG&E or NID, the other hydropower producers in the area. This is important because Rise would need to build transmission lines and substations in order to get the power they produce to the existing power grid.

Ind 835-9

Rise Gold's Demonstrated Lack of Good Faith.

Rise Gold has made many dubious claims in newspaper articles and in letters to locals about findings from "NID" studies that don't exist, approval and backing from the county board of supervisors which it doesn't have, to promote the mine. If it is willing to tell lies and half-truths to achieve its goals now, how can we ever be assured that Rise Gold will live up to any environmental promise it makes? Personally I find it hard to believe.

While I have many concerns, I have only a few stated here. I am grateful for the opportunity to comment.

Should you need to contact me, I can be reached as follows:
rbheck@gmail.com
530-913-4918
13641 Greenhorn Road
Grass Valley, CA 95945
Sincerely,

William Heck

William Heck
Homeowner

INDIVIDUAL LETTER 835: WILLIAM HECK

Response to Comment Ind 835-1
Comment noted. Responses to specific comments are provided below.

Response to Comment Ind 835-2
As discussed in Section 3.3.2 and shown on Sheet 12 of Appendix K.2 of the DEIR, over 1,200 Water Well Driller Reports (also known as Well Completion Reports) available from the California Department of Water Resources (DWR)'s online database for private domestic wells are located within approximately one to two miles of the project site. Many of these wells are geolocated by property location in the DWR database, while some are only located by the US Public Land Survey System (PLSS) township, range, and section. In areas within the predicted 1-foot drawdown from the groundwater model, wells with only general PLSS locations in the DWR database were matched to properties and plotted. The well database was also augmented with well data from the previous applicant Emgold which provides additional well information within the 1-foot drawdown isopleth that is not available in the DWR database. All available details about well construction and testing in the area of the 1-foot drawdown isopleth were reviewed and tabulated from the Well Completion Report or Emgold records and are provided and discussed in Section 3.3.2 of Appendix K.2., which are available for the majority of properties. The Well Mitigation Plan has been clarified to include measures to identify any wells not in the well database and gather individual well characteristics should an impact be predicted by the Groundwater Monitoring Plan. The revised Well Mitigation Plan is attached to the Final EIR as Appendix D. The commenter states that a complete inventory of domestic water wells within and beyond the mineral rights boundary is required for the analysis of the DEIR. However, wells outside the 1-ft drawdown were not specifically analyzed for impacts from mine dewatering because they would experience negligible drawdown and therefore would not be impacted by mine dewatering. More effort in including these wells in the well database would not change the analysis nor conclusions of the DEIR, nor the require mitigation, and therefore is not required.

With respect to the commenter's property specifically, this property is located outside of the 1-ft isopleth, as shown on Sheet 12 of Appendix K.2 of the DEIR, and therefore is predicted to experience negligible drawdown (less than one foot of drawdown) and impact from mine dewatering. Approximately five wells adjacent to the commenter's property are mapped on Sheet 12 based on the DWR database information. Nevertheless, the groundwater monitoring plan is implemented to ensure that any impact would be predicted and preemptively mitigated if necessary. Wells would not be contaminated by mining activities as water would not travel from the deep underground workings to the shallower domestic water wells. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 835-3
The Well Mitigation Plan has been clarified to explain actions that would be taken for well mitigation, if required, in more detail. Please see the revised Well Mitigation Plan attached the Final EIR as Appendix D. Well mitigation outside of the E. Bennett area may not include the connection to NID potable water depending on the circumstances, as storage tanks and/or well deepening may be adequate solutions. Any mitigation required for wells impacted by the project would be done so at the cost of the applicant. Please see Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 7 - Location of Future Mining Areas.

Response to Comment Ind 835-4

Baseline groundwater quality data is required to be collected 12 months before the commencement of mine dewatering and will be collected from groundwater monitoring wells, which will be representative of the groundwater quality in surrounding domestic water wells. Please see Mitigation Measure 4.8-2(a) and Master Response 15 - Adequacy of Groundwater Monitoring Wells. As noted in Master Response 15, the applicant has now provided a Domestic Well Monitoring Plan to monitor domestic water wells within or nearby the predicted 1-ft drawdown isopleth of the project. These 378 properties are listed in Table 1 and shown in Figure 1 of Master Response 15. To provide property owners additional assurance, a condition of approval will be imposed on the project requiring this domestic well monitoring.

Response to Comment Ind 835-5

Mitigation Measures are designed to ensure wells would not be contaminated by mining activities and baseline groundwater quality data will be collected and groundwater quality will be monitored throughout operations. Please see Master Response 15 - Adequacy of Groundwater Monitoring Wells.

The comment is noted regarding the commenter's existing groundwater well.

Response to Comment Ind 835-6

Noise from project activities has been analyzed in Chapter 4.10 of the DEIR and is determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. As discussed on pages 4.10-22 through 4.10-24, the noise analysis used the SoundPlan prediction model which includes the consideration of topography, distance, atmospheric absorption, topographic shielding, and ground cover. The applicable CEQA threshold of significance for noise impacts is not audibility. Furthermore, while the DEIR determined, based on best available data, that the project's operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring program shall evaluate noise levels at a minimum of five receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Also see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Ind 835-7

Fire evacuation routes are discussed and analyzed in Chapter 4.13 of the DEIR. Also see Master Response 5 - Evacuation Zones.

Truck traffic has been analyzed in the DEIR. Please see Chapter 4.12 and Appendix O of the DEIR. Please see Figure 3-13 of the DEIR which shows project haul routes. As described in the traffic analysis of the DEIR, numerous trucks already use these roads which have sufficient width to accommodate on-road truck traffic.

Response to Comment Ind 835-8

The applicant does not require a FERC license and no power generation, other than backup generators, is proposed for the project.

No transmission lines are required for the project. As stated on page 4.11-34 of the DEIR, the electrical grid system in the project area is well developed. A commercial sawmill that previously operated on the Brunswick Industrial Site was serviced by a dedicated 12kV PG&E power line. A high voltage power line also runs through the property west of the Brunswick shaft. Electricity for the proposed project would be supplied by the existing 12 kV PG&E line along Brunswick Road. PG&E provided a will serve letter for the project and has confirmed that there are electric facilities available to serve the proposed project in accordance with all applicable design standards, rules, and tariffs on file with the State of California Public Utilities Commission. An onsite substation would be constructed to convert utility power to the voltage necessary for project machinery and equipment (see page 3-40 of the DEIR).

Response to Comment Ind 835-9

Please see Master Response 3 - Operator Responsibility.

Individual Letter 836

From: William Huddleston
To: Idaho MMEIR
Subject: For Rise Mine proposal- submission due by 4pm
Date: Monday, April 4, 2022 12:38:20 PM

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Matt Kelley Planning Commission Supervisor

Our Family is VERY OPPOSED to the Idaho-Maryland Mine.

Ind 836-1 There are many claims made by the Rise Gold Corp. that we find to be inaccurate . Many of them were pointed out in the article written on the April 1 st "Digging Deeper "(published in THE UNION).

The Rise Corp states the they will be creating over 600 jobs in our community. When I look at the actual details they want to hire 300 people locally to work in the mine. The community will be expected to add 300 jobs to local business to service those people. My question is, "Why would we need more services for people that already live here and use existing services in our community?"

Ind 836-2 We also feel that TOURISM will be greatly impacted by pollutant being added to the RIVERS, WATERWAYS and AIR QUALITY . These will not only impact our community but will impact the surrounding communities as we have learned form Malakoff Diggins .
PROPERTY VALUES will also be impacted greatly. Our family will be expecting great reductions in our property taxes because of our proximity to the mine .

Ind 836-3 Thank you for your time,

The Huddleston Family

INDIVIDUAL LETTER 836: WILLIAM HUDDLESTON

Response to Comment Ind 836-1

The comment does not address the adequacy of the DEIR, but rather expresses general concerns regarding applicant statements. Please see Master Response 1. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 836-2

Please see Master Response 2 as it relates to tourism and economic impacts. Refer to chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and Chapter 4.8, Hydrology and Water Quality, and Master Response 35 for more information related to air and water pollution, respectively.

Response to Comment Ind 836-3

Property value concerns are outside the scope of CEQA – please see Master Response 2.

Individual Letter 837

From: Bill Larsen
To: BOS Public Comment
Subject: rISE gOLD FIASCO
Date: Monday, February 28, 2022 10:48:52 AM

Dist 1

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Ind 837-1

DEAR NC BOARD OF SUPERVISORS,

PLEASE DO NOT ALLOW RISE GOLD TO RE-OPEN ITS MINE. THE ENVIRONMENTAL IMPACT REPORT, FUNDED BY RISE GOLD, IS A SHAM, AND IT IS YOUR JOB TO EXAMINE THE MANY NEGATIVE EFFECTS OF THIS PROJECT IN EXACTING DETAIL TO PROTECT PUBLIC INTEREST AND HEALTH. TOUR BELOVED COMMUNITY WILL SUFFER GREATLY IF THIS DISASTEROUS PROJECT IS ALLOWED TO GO FORWARD.

WILLIAM LARSEN, NEVADA CITY (530-265-4049)

INDIVIDUAL LETTER 837: WILLIAM LARSEN

Response to Comment Ind 837-1

The commenter asserts that the DEIR is a sham but does not provide any specific examples or evidence to support this spurious claim. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 2.

Individual Letter 838

From: Bill Maas <BillMaas@outlook.com>
Sent: Thursday, March 24, 2022 11:36 AM
To: Idaho MMEIR
Subject: Rise Gold Mine

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Planning Commission and Board of Supervisors:

I am writing this message to state my extreme opposition to the proposed Rise Gold Mine project.

Ind 838-1 We moved up here to Nevada City 30 years ago from Marin County, and have loved the environment and life-style of Nevada County ever since. We fear our environment will be irreparably damaged by this mine. These are the main factors that concern us:

Pollution of our air and water.

Ind 838-2 Track record of Rise Gold Mining Company is very poor.

Ind 838-3 Extreme over usage of power.

Ind 838-4 Extreme over usage of our groundwater at a time when our water is in critically short supply.

Ind 838-5 Property values will decrease.

Ind 838-6 An estimated one hundred heavy truck loads per day plus the additional noise and vibration of the heavy equipment on site 24/7.

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Sincerely,

Bill Maas

William F Maas
16131 Countrywood Lane
Nevada City CA 95959

INDIVIDUAL LETTER 838: WILLIAM MAAS

Response to Comment Ind 838-1
The comment does not address the adequacy of the DEIR, but rather expresses general opposition regarding the proposed project. Please see Master Response 1. Impacts related to air and water are evaluated in chapters 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, and 4.8, Hydrology and Water Quality, of the DEIR. The comment has been noted for the record and forwarded to the decisionmakers for their consideration.

Response to Comment Ind 838-2
Please see Master Response 3 - Operator Responsibility.

Response to Comment Ind 838-3
Please refer to Chapter 4.11, Public Services and Utilities, and, specifically, Impacts 4.11-6 and 4.11-11, for additional information related to electricity consumption.

Response to Comment Ind 838-4
Please refer to Chapter 4.8, Hydrology and Water Quality, for additional information related to groundwater. Additionally, see Master Responses 15 and 16, which relates to groundwater pumping and drought conditions.

Response to Comment Ind 838-5
Property value concerns are outside the scope of CEQA - please see Master Response 2.

Response to Comment Ind 838-6
Regarding haul truck noise, DEIR Impact 4.10-2 concluded all noise generated from engineered fill placement and compaction, and noise associated with haul truck operation (excepting potential jake brake use) and worker trips during this period, would remain below the applicable noise standards. Noise generated from hauling fill from the Brunswick Industrial Site to the Centennial Industrial Site could exceed local standards if jake brakes are used. Thus, Mitigation Measure 4.10-2 is included in the DEIR to reduce this impact to a less than significant level. Please refer to Chapter 4.10, Noise and Vibration, for additional information related to noise and vibration impacts associated with the proposed project.

Individual Letter 839

From: Yasha Aginsky <yaginsky@gmail.com>
Sent: Friday, April 1, 2022 8:12 AM
To: Idaho MMEIR
Subject: EIR comment

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Ind 839-1

As a concerned citizen and resident of Nevada City, I have followed the issue of re-opening the Idaho-Maryland gold mine with great interest. I attended the Planning Commission Public Hearing on March 24, which left me with grave concerns about the "feasible mitigation measures on potentially significant impacts" and "significant and unavoidable impacts" in the EIR. The former have been addressed by many letters and opinion pieces recently published in The Union newspaper. As for the latter, I would like to comment on their "unavoidable" effect on the quality of life of local residents.

To many of us who have chosen to live in this part of Nevada County, the natural physical beauty of the area, its relative calm and the lack of congestion are what keep us here, but they are fragile and need protection, rather than more challenges. Economic growth and industrial expansion must be weighed against their consequences for the environment, which in the case of the reopening of the Idaho-Maryland or any mine would be potentially catastrophic in terms of visual aesthetics, greatly increased truck traffic and constant noise pollution.

The era of resource extraction in our county has passed for good reasons; we are living in a populated, touristic region that depends on the health and beauty of the natural environment for economic survival and for our good health and recreation. We cannot afford ANY deterioration to our air quality, our water supply or our soil, nor can we increase the risk of wildfire or climate warming due to industry activity.

Given no environmental benefits, what is in this EIR for us residents? Profit? The main Rise Gold claims economic prosperity through creating a varying number of proposed jobs, of which they have said 213 may be local. Is that proposal reward enough to validate an 80 year permit to undermine and pollute our land and water and endanger our and our childrens' future?

As you can tell from the growing response by so many concerned citizens, this is a serious matter for the future of our lifestyle and our county. I urge you to take heed of the concerns of those who you represent and serve, and do not issue this permit.

Yasha Aginsky
541 N.Pine St.
Nevada City, CA 95959

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INDIVIDUAL LETTER 839: YASHA AGINSKY

Response to Comment Ind 839-1

Please see Master Response 1. Impacts related to visual aesthetics, truck traffic, noise pollution, air quality, water supply, and soil are evaluated in their respective chapters of the DEIR. Because significant and unavoidable impacts have been identified in the DEIR, the County, should it decide to approve the proposed project, would be required to adopt a Statement of Overriding Considerations.

Pursuant to CEQA Guidelines Section 15093, CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." Such an outcome would necessitate a Statement of Overriding Considerations.

Individual Letter 840

From: Ronni <ronninavarro@gmail.com>
Sent: Sunday, April 3, 2022 7:24 PM
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Re-opening the Idaho Maryland Mine

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Hello Mr. Matt Kelley,

I am writing to say that I feel that re-opening the Idaho Maryland Mine would be an incredibly destructive mistake. I have strong concerns about the effects on creeks and rivers, wetland vegetation, the impact on the local wildlife, soil and air pollution. Climate change is already causing us to face droughts almost every year and bringing forth immense concerns about wildfires and our water needs. We don't need the added destruction from opening the mine. Look how low the local creeks and rivers are already. I feel the working mine will contaminate the creeks, nearby wells and destroy the wetlands. They will be focused on mining and not concerned about the devastating long-term effect on the environment, keeping the water clean, prevention of hazardous materials in the water, which will also affect the vegetation in the wetlands. Working the mine will cause voluminous noise pollution and their added traffic will impact our small community roads.

Ind 840-1

I am a native born Grass Valleyian and my family has lived in the area for close to ninety years. I grew up enjoying and appreciating our quality of life, swimming the rivers, walking the trails and viewing the beautiful nature surrounding us. It would be would be a crucial mistake to re-open the Idaho Maryland Mine. **Please vote against reopening the Idaho Maryland Mine!**

Sincerely,
Yvonne Ronningen Navarro

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INDIVIDUAL LETTER 840: YVONNE NAVARRO

Response to Comment Ind 840-1

The comment does not directly address the adequacy of the DEIR. The comment has been noted for the record and forwarded to the decision-makers for their consideration. For concerns related to creek impacts, please see Master Responses 32, 35, and 36. For climate change concerns, please see DEIR Chapter 4.3 (Air Quality, Greenhouse Gas Emissions, and Energy) and Master Response 16 – Drought and Climate Change. For concerns related to well impacts, please see Master Response 15 – Adequacy of Groundwater Monitoring Wells. For noise concerns, please see Chapter 4.10, Noise and Vibration, and Response to Comment Ind 795-1. For general traffic concerns, please see Chapter 4.12, Transportation. The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration.

Individual Letter 841

From: Zohar Alevizakis <tuffcris22@gmail.com>
Sent: Saturday, April 2, 2022 3:29 PM
To: Idaho MMEIR
Subject: No to mine

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Ind 841-1 I am 14 and me nor any of my friends want it

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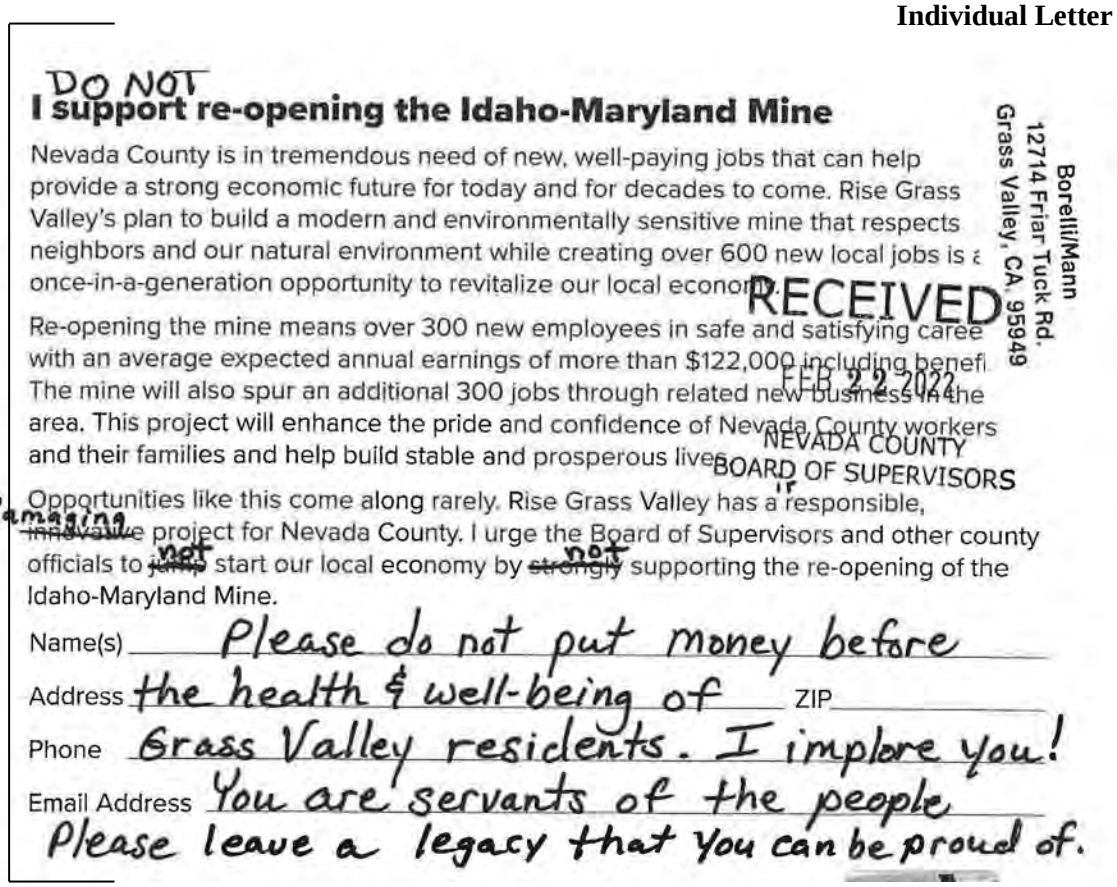
INDIVIDUAL LETTER 841: ZOHAR ALEVIZAKIS

Response to Comment Ind 841-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 842



DO NOT
I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees in safe and satisfying caree with an average expected annual earnings of more than $122,000 including benefi The mine will also spur an additional 300 jobs through related new business in the area. This project will enhance the pride and confidence of Nevada County workers and their families and help build stable and prosperous lives.

Opportunities like this come along rarely. Rise Grass Valley has a ~~irresponsible~~ damaging project for Nevada County. I urge the Board of Supervisors and other county officials to ~~help~~ not start our local economy by ~~strongly~~ not supporting the re-opening of the Idaho-Maryland Mine.

Name(s) Please do not put money before

Address the health & well-being of ZIP

Phone Grass Valley residents. I implore you!

Email Address You are servants of the people

Please leave a legacy that you can be proud of.

Borelli/Mann
12714 Friar Tuck Rd.
Grass Valley, CA. 95949

RECEIVED
FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Ind
842-1

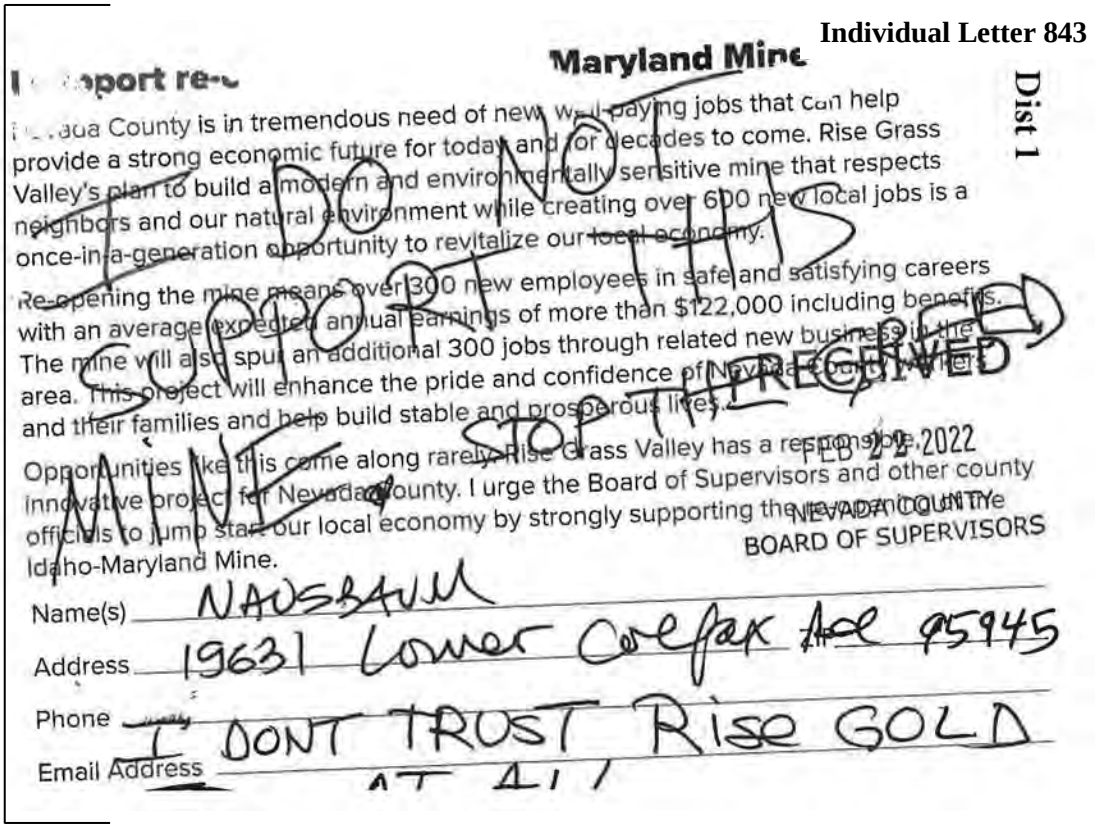
I

INDIVIDUAL LETTER 842: BORELLA / MANN

Response to Comment Ind 842-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 843



Dist 1

Ind 843-1

I support re-o **Maryland Mine**

Nevada County is in tremendous need of new well-paying jobs that can help provide a strong economic future for today and for decades to come. Rise Grass Valley's plan to build a modern and environmentally sensitive mine that respects neighbors and our natural environment while creating over 600 new local jobs is a once-in-a-generation opportunity to revitalize our local economy.

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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

I DO NOT SUPPORT THIS MINE, STOP THE RECEIVED

FEB 22 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) NAUSBAUM

Address 19631 Lower Colfax Ave 95945

Phone

Email Address I DONT TRUST Rise GOLD AT ALL

INDIVIDUAL LETTER 843: NAUSBAUM

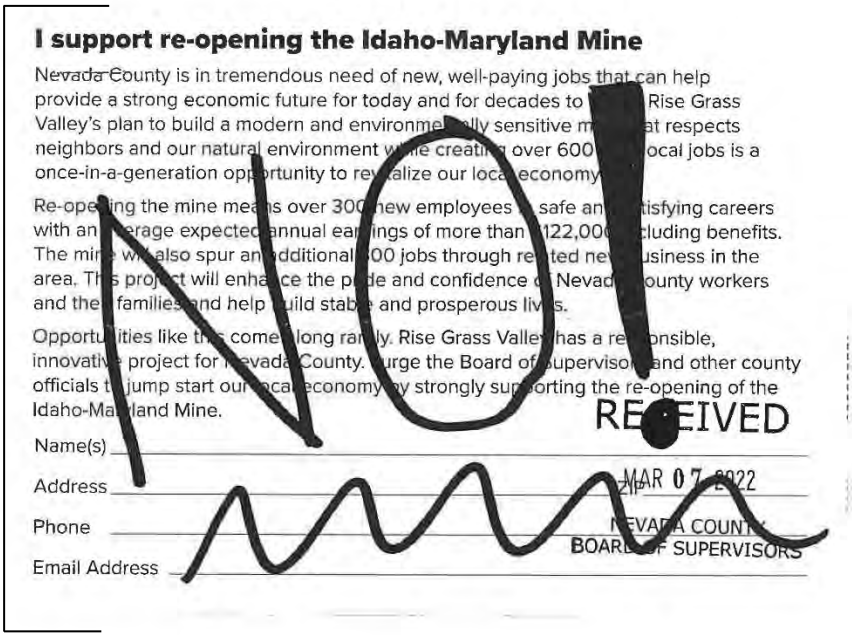
Response to Comment Ind 843-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 844

Dist 3
Savelly
224 Fiddick Ln
Grass Valley

Ind 844-1



I support re-opening the Idaho-Maryland Mine

Nevada County is in tremendous need of new, well-paying jobs that can help provide a strong economic future for today and for decades to [illegible] Rise Grass Valley's plan to build a modern and environmentally sensitive m[illegible]at respects neighbors and our natural environment while creating over 600 [illegible]ocal jobs is a once-in-a-generation opportunity to revitalize our local economy.

Re-opening the mine means over 300 new employees [illegible] safe and [illegible]tisfying careers with an [illegible]erage expected annual earnings of more than $122,000 [illegible]cluding benefits. The mine will also spur an additional [illegible]00 jobs through related new [illegible]usiness in the area. This project will enhance the pride and confidence of Nevada [illegible]ounty workers and their families and help build stable and prosperous lives.

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NO!

RECEIVED
MAR 07 2022
NEVADA COUNTY
BOARD OF SUPERVISORS

Name(s) _____

Address _____ Zip _____

Phone _____

Email Address _____

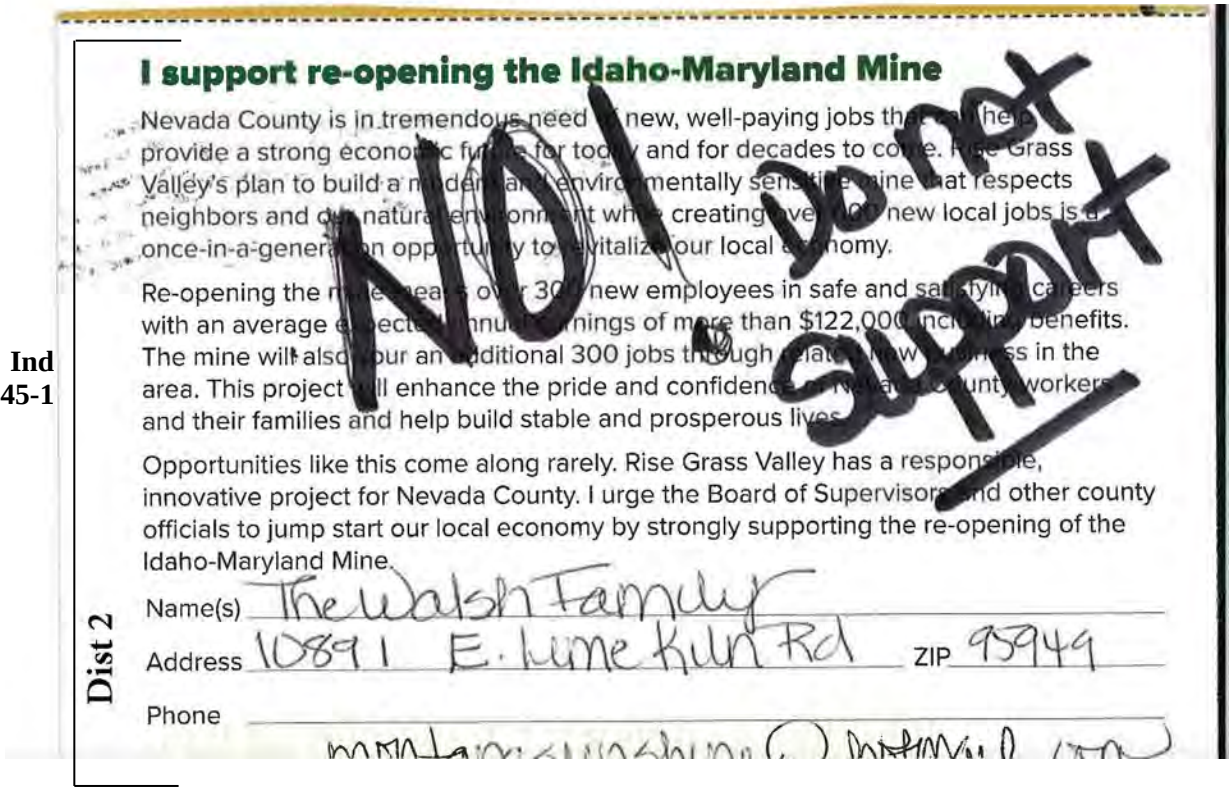
INDIVIDUAL LETTER 844: SAVELLY

Response to Comment Ind 844-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Individual Letter 845

Ind
845-1



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Opportunities like this come along rarely. Rise Grass Valley has a responsible, innovative project for Nevada County. I urge the Board of Supervisors and other county officials to jump start our local economy by strongly supporting the re-opening of the Idaho-Maryland Mine.

NO! I do not support

Dist 2

Name(s) The Walsh Family

Address 10891 E. Lime Kiln Rd ZIP 95949

Phone

INDIVIDUAL LETTER 845: WALSH

Response to Comment Ind 845-1

The commenter's opposition to the proposed project has been noted for the record and forwarded to the decisionmakers for their consideration. Please see Master Response 1.

Late Letter 1

From: CLAYDON GERIATRIC MEDICINE
To: Idaho MMEIR
Subject: Opposed to Mine opening
Date: Tuesday, April 5, 2022 10:19:24 AM

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Dear Matt Kelley,

As business owners, we are very much in favor of free enterprise. We have lived in the county since 1981 and love the rich history.

Lt 1-1

We also are realistic and recognize that we are in an historic drought. Depleting our ground water seems to be an illogical step to take if we are looking to improve our county's health.

We are very much opposed to the reopening of the mine. This property could have a use that is not harmful to our quality of life.

Respectfully,

Christopher and Susan Claydon

CLAYDON GERIATRIC MEDICINE
Christopher Claydon, MD
Susan Claydon, NP

152 Catherine Lane, Suite A
Grass Valley, CA 95945
Phone 530-271-0432 fax 530-271-2200

Sent with ProtonMail secure email.

LATE LETTER 1: CHRISTOPHER CLAYDON

Response to Comment Lt 1-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life and economic concerns are outside the scope of CEQA – Please see Master Response 2.

With regards to concerns about drought, please see Master Response 16.

Late Letter 2

From: NEALEEN COWARD
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: NO MINE
Date: Wednesday, April 6, 2022 1:46:11 PM

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Lt 2-1

I am a registered voter and resident of Grass Valley. I moved here to enjoy the peaceful quiet and solitude of the California Sierra Foothills.
I can see that this mine would diminish the quiet solitude of the current environment I moved here for.
The current studies of the Rise plan is a whitewash of wishes not results. We cannot be an experiment of a failed industry. The noise and air pollution is just a small part of the invasion into our quiet, calm community which is happy the way we are.

WE DO NOT WANT TO HAVE A GOLD MINE HERE AGAIN EVER!!

LATE LETTER 2: NEALEEN COWARD

Response to Comment Lt 2-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

With regard to concerns about air pollution, please see Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Noise associated with the proposed project is addressed in Chapter 4.10, Noise and Vibration, of the DEIR.

Late Letter 3

From: Rick David Larsen
To: Idaho MMEIR
Subject: Idaho Maryland Mine
Date: Tuesday, April 5, 2022 10:33:00 PM

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Lt 3-1

To whom it may concern,

Why would you hand over the keys to the kingdom to someone with a known history of deceit and criminality? Whether we are talking about national politics or local small town issues the answer should be: fool me once shame on you, fool me twice shame on me.

I've been quietly considering the potential opening of the Rise Gold Mine in Grass Valley. Full disclosure: I have not fully researched this in depth and I definitely see how we are all dependent on mining and various minerals. So, while I think it would be hypocritical to be against any and all mining projects, I'm against this one. There is a lot of information flying around about this project but to me it comes down to this one issue which makes it a non-starter.

This area has no small history with mining, with many of the sites being built and thriving during the California Gold Rush era. I recently took a ride up to North Bloomfield, an historic mining site not far from here which had 1200 residents or so at its peak and was originally named Humbug. It's a nice little drive out on Hwy 49 from Nevada City. It's now mostly known as Malakoff Diggins State Historic Park, it's worth a visit. It's significant as it was the largest hydraulic mining site in California but also known for Woodruff v. North Bloomfield Gravel Mining Company which was a lawsuit brought against the mine by farmers in 1882 and the decision favorable to the farmers is considered the first environmental law in California.

Now to the present. In a letter to the editor at The Union newspaper, a Nevada City resident states that "Mr. Mossman's (CEO of Rise Gold) past patterns of behavior demonstrate to me that he is extremely unlikely to be a good steward of the operating permit for the Idaho-Maryland Mine, nor will he protect the essence of what makes Nevada County a paradise."

Don Rogers, the publisher of the Union, in an article that leans toward giving the project the benefit of the doubt but admits there is a very present public skepticism about it states, "It doesn't help that his (Mossman) experience running a mine in British Columbia ended (7 months) with a spill left to locals to clean up, abandonment, bankruptcy and criminal proceedings still pending." Bankruptcy was declared in 2016 and Mr. Rodgers assessment seems understated given the toxic legacy that was left behind. As of 2021 the site was still considered by BC Mining Law Reform as one of British Columbia's "Dirty Dozen" top polluters.

As we go to the polls next time I would suggest rejecting any local politician, county supervisor, city council member etc. who supports bringing this kind of legacy to our community.

Thank you, R. Larsen, Nevada County resident living near Nevada City proper.

Sent from my iPad

LATE LETTER 3: RICK LARSEN

Response to Comment Lt 3-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Late Letter 4

From: bobbyburb@icloud.com
To: Idaho MMEIR
Subject: Draft EIR
Date: Wednesday, April 6, 2022 3:26:42 PM

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Lt 4-1

I am incredibly disappointed in the casual dismissal by the EIR of many potential disruptions to our environment, and as a homeowner in the immediate vicinity of the mine, the quality of life and financial issues that reopening of this mine represent to my family and neighbors. I hope that the County Board will look at this proposal realistically, and not be swayed by the false hype offered by Rise Gold in order to gain public support.

Robert S Burbridge
12976 Madrona Leaf Ct.
Grass Valley, Ca 95945

LATE LETTER 4: ROBER BURBRIDGE

Response to Comment Lt 4-1

The commenter's opposition to the project and concern regarding the Project Applicant is noted for decisionmakers. The commenter is referred to Master Response 1 - Non-EIR/Administrative Issues. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Late Letter 5

From: sgotla@gmail.com
To: Idaho MMEIR
Cc: DEIRcomments@cea-nc.org
Subject: Idaho Maryland Mine
Date: Tuesday, April 5, 2022 7:38:18 AM

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Hey Folks,

Please reconsider reopening the Idaho Maryland Mine.

I'm a 30+ year resident of Nevada County and have sincere concern this project could contaminate the local watershed and ruin groundwater wells in the surrounding area. I have witnessed the adverse consequences of mismanaged land use associated with mining throughout Nevada County and the Sierra Nevada Foothills. To this date we are still cleaning up, remediating, and dealing with the toxic and poisonous old mine sites throughout the foothills.

Lt 5-1

I've grown up with friends on the North San Juan Ridge who've had their ground water wells both contaminated and depleted because of mining in their neighborhoods, specifically in some cases by the Siskon Mine. This mine also contaminated the drinking water of nearby school Grizzley Hill - The mine had to pay to truck in drinking water because the mine contaminated the schools well. That said, it appears the groundwater model used in the DEIR is flawed and the baseline assumptions used are erroneous. This is not scientific data and many citizens of Nevada County know first hand how disastrous mines can be to the local groundwater. Please reconsider the information being presented in this study and how it relates to Hydrology and Water Quality.

Furthermore I have concerns over traffic and noise for the surrounding neighborhoods. Many folks moved to rural Nevada County for the peace and quiet of the mountains. We are all hearing that residents living in the immediate area are extremely concerned with the amount of noise and traffic the mine will generate. Please take their concerns to heart when making final decisions whether or not to open the mine.

As final decisions are made, I hope the quality of life for our local citizens and our beloved natural environment are given higher priority than a little temporary economic gain for RISE Gold, some out of town Canadian Company.

Thank You,

Sebastian Gotla
30+ Year Nevada City Resident.

LATE LETTER 5: SEBASTIAN GOTLA

Response to Comment Lt 5-1

The commenter expresses general concerns regarding contamination and depletion of groundwater wells, and states that the groundwater model used in the DEIR is flawed and the baseline assumptions used are erroneous. With respect to these concerns, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 35 - Discharge to South Fork Wolf Creek.

The commenter also expresses general concerns regarding traffic and noise, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Regarding concerns related to increased traffic on local roadways, please refer to Chapter 4.12, Transportation, of the DEIR. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Late Letter 6

From: Valerie Kack
To: Idaho MMEIR
Subject: Mine
Date: Tuesday, April 5, 2022 5:57:41 PM

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Lt 6-1

I have lived in Nevada County for 40 years. And have fought the reopening of the mine so many times. By position is unchanged. I live on Wolf Creek, I am there at its banks 2 to 3 times a day, I watch what happens after the rains. The toxic chemicals which have remained in tunnels from old mines a long Wolf Creek get flushed into the creek and along the shore remain pools where this sludge resides. It is a red Algae bloom, arsenic, oil slicks, and fish we have caught from the river have had cancer. I feel very strongly about protecting our rivers and our fresh waterways. To add the horrible chemicals and seepage from opening that mine will decimate the nature that lives along this creek. I get seepage even in the feeder creek that goes right next to my house down to Wolf.I see the same toxic disregard from other humans who think they can dump their used oil into the waterway. It comes by me, I see it every day. Please do not let this mine re-open nor any other mining organization in the future. Can we please consider our mining history just that... history.
Valerie Kack
Valeriekb@SBCglobal.net

LATE LETTER 6: VALERIE KACK

Response to Comment Lt 6-1

The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. With regard to concerns about impacts to waterways, please refer to Chapter 4.8, Hydrology and Water Quality, of the DEIR and Master Response 35 - Discharge to South Fork Wolf Creek.

DEIR Meeting

----------x

TRANSCRIPTION - IMM COMMENT MEETING VIDEO:

----------x

TRANSCRIBED FROM NEVADA COUNTY PLANNING COMMISSION SPECIAL MEETING

IDAHO-MARYLAND MINE DRAFT EIR PUBLIC COMMENT MEETING

THURSDAY, MARCH 24, 2022, at 9:30 A.M.

BOARD OF SUPERVISORS CHAMBERS

950 MAIDU AVENUE, NEVADA CITY, CA 95959

REPORTED BY: BRANDI CHAMBERLAIN

[START NEVADA COUNTY PUBLIC COMMENT HEARING_IDAHO-MARYLAND MINE_3.24.2022]

[START AT 1:31:22]

AL: I, I found the, uh, the whole EIR very complete. I reviewed the one at Rancho Seco where I work at the nuclear power plant and it was very comparable to everything being covered. I also have, uh, experience in the nuclear navy with water treatment under Admiral Rickover. And, uh, their water treatment parallels what we had in the navy aboard the enterprise to protect our eight reactors which was two parts per billion.

Meet-1

Also, with the world situation today, the minerals that are down there, not only gold but also tungsten, which is used as anti-tank munitions, should be considered strategic materials. We need those materials badly and with all the electronic systems functioning today and with hypersonic missiles and so on, all needing gold contacts--remember, gold will carry a

Meet-1

charge and not corrode. So it's very important in all these strategic electronic systems. So what we have here is, is essential to our, our nations future looking at potential war with Russia and China. Thank you.

GREENO: Thank you, Al. And, again, I'll just remind if you would please hold your comments to adequacy of the EIR.

Meet-2

SILVERSTEIN: Hello, thank you. I'm Ralph Silverstein [phonetic], President of CEA Foundation. CEA stands for Community Environmental Advocates. We are also the sponsor of MineWatch. Over a year ago CEA established a research team composed of various talented and concerned community members and representatives from other community groups. I'm told there are over 400 people out here.

We have a wide range of expertise varying from a general building contractor to people holding MBA degrees, geologists, a Ph.D. in civil and environmental engineering,

Meet-2

and master's in computer science, science teachers, an author, and others are among our ranks. We have also expert consultants to address certain areas and our legal representative is Houghton Helene Weinberger [phonetic], who will be submitting detailed comments on the draft.

Our goal has been to review the technical studies for the mine project for the purpose of public education and to review the draft EIR extensively, to assure that the EIR is accurate and adequate. In summary, we have conducted an extensive review.

What is most surprising is that after well over a year in the preparation to produce a massive document, it has so many missing elements and so many inadequate assessments. Starting with the most fundamental aspects, a good EIR relies upon adequate and reliable data in order for the decision makers, that's you, to be adequately informed. Yet, in this draft we

find almost no useful text--uh, test results for assessing air or water quality hazards for mine waste.

Meet-2

For example, to determine air quality impacts, the results rely upon data that is collected from inadequate sampling that was also processed incorrectly. Hydrology studies rely upon narrow bands of data that were collected over 15 years ago and even these data are misinterpreted in some cases. Even at the higher level, the project fails to address important areas of study and omits the Centennial cleanup on Idaho-Maryland Road.

Meet-3

The extensive mine tailing waste that is on the Centennial side is currently part of a cleanup project that is still not even approved by the Department of Toxic Substances Control, or DTSC. The site contains contaminants such as arsenic and lead, and more, that pose potential hazard to people and the environment. Correspondents from the EPA in 2019 stated

Meet-4

Meet-4

that the Centennial's site potential designation as a superfund site was conditionally deferred because Rise entered into a cleanup contract with the DTSC. Yet this draft EIR is based upon an assumption that it is already cleaned up.

Meet-5

The examples of inadequacies are abundant. Members of our organization will touch on some of them today and they will be fully documented in our written comments which will be submitted on March 30th. Thank you very much.

GREENO: Thank you, Ralph.

Meet-6

RAVINES: Good morning. Greetings. I am Barbara Ravines [phonetic]. I have lived in Grass Valley for the last eight years of our 25 years here. I am a member of the CEA Foundation and active in many other organizations in the county. I think--

GREENO: [Interposing] Barbara, will you give us your address?

RAVINES: Pardon me?

GREENO: Address?

Meet-6

Meet-7

RAVINES: Oh, 10--thank you. I may screw that up. 108 Bridger Court, Grass Valley, sorry. I thank the Planning Commission and Department of--the Department, actually, for its hard work on this project.

My interest is groundwater impacts and mitigations. In the DEIR, groundwater impacts are concluded to be significant but avoidable mitigation. It was the DEIR's conclusion with inadequate analysis, unreliable monitoring, unfounded impact criteria, and mitigation measures that are of unproven effectiveness. We need to know with accuracy what could happen to the hundreds of residential wells in the impact area of this vast, underground mine, when it begins operations over the next 80 years.

Of critical concern, the proposed project would sig--significantly affect local groundwater resources by dewatering the mine, lowering groundwater levels. The DEIR recognizes groundwater levels to be lowered to 242 well owners but then assumes

that having one's well water go down a couple of feet is not a problem. Considering that we are in a long range drought and worsening climate change, this arbitrarily low impact threshold is invalid.

Meet-7

The mitigations proposed by the EIR--DEIR are inadequate foremost because there is a potential impact to well owners in the area. A comprehensive monitoring plan must be implemented prior to dewatering established--to establish a baseline. The monitoring, monitoring should run at least three years. The monitoring plan that was done for the 2008 application is outdated, does not cover enough area, and has--is based on only operating for 20 years, unreliable monitoring.

Meet-8

Models of the groundwater in fractured rock have serious reliability issues. The model used is DEIR is assumes that the rock mass is homogeneous. There are too many faults and too little data to trust that model to produce valid results. Plus, the

Meet-8

model assumes that the mining will be limited to very narrow region and yet even in the hydrological model report it shows proposed mining that extends outside of the mineral rights zone.

I'm going to say essentially no water balance assessment was provided as well, and these issues need to be rectified...

GREENO: Thanks, Barbara. And thanks for working through the little interruption there. Cellphones off, please. That, that will help. Welcome.

Meet-9

SCHWARTZ: Thank you for giving me an opportunity to speak. My name is Paul Schwartz [phonetic]. I live at, uh, 13812 Meadow Drive, Grass Valley, in District I. Um, I came to, to Nevada City in 1971. I have an AA, a BS, and an MBA in business administration. I was Director of Maintenance and Operations for Pleasant Ridge School District for 19 years and a capital planner at UC Davis for 10 years.

I was a member of the Grass Valley

Planning Commission for six years and Parks, Parks and Recreation Commission for two. And I'm a volunteer with the Community and Environmental Advocates Foundation.

Meet-9

We agree with the DEIR conclusion that the aesthetic impacts of the mine project would be significant and unavoidable. We feel throughout the DEIR our local conditions are seriously undervalued. Brunswick Road is concluded to have only moderate visual sensitivity because it includes a past industrial site, and a moderate traffic levels with corresponding moderate number of viewers.

Meet-10

This ignores the fact that it is a major entryway into the Brunswick basin. As an entryway, it will continue to grow in importance and traffic volume. It represents the first impression for many guests to our community and should not be dismissed because it does not have a scenic designation.

There is a direct link between our

Meet-10

economic success and the natural beauty of our area. Brunswick Road will become busier and busier, and should be recognized and protected from development that impacts its future success as an entryway to our community and a major arterial. These issues should be added to the DEIR.

Meet-11

Mitigation 4.1-3, the DEIR concludes that the mine project will not create a new source of substantial light and glare which would adversely affect day or nighttime views in the area. We disagree. Regardless of previous industrial activity at this location, decades have passed since their departure and the area is now predominantly rural, residential, and quite dark at night. The new level of light from project lighting and the nighttime hauling described in the DEIR would be unacceptable given the current low, very, very low ambient night lighting of the area. Dismissing these impact is unacceptable and analysis that recognizes these impacts must be part of the EIR. The

impact is likely unavoidable.

The DEIR describes the no project alternative in terms that maximize the development of the Brunswick property. As a result, the alternative use option was not considered. In reality, an industrial mixed use project is a distinct option and in the future that might include utilities, manufacturing, information, RND, real estate, professional, the arts, entertainment, recreation. All of these would create more jobs, use less energy, have lower carbon footprints, and generate more local wealth than the Rise Gold proposal. The alternative sections in the DEIR need to be more honest and profession in describing alternatives to the Rise Gold proposal. Thank you.

Meet-12

GREENO: Thank you, Paul.

CLARKE: Good morning. I'm Bill Clarke [phonetic]. I live at 324 Vistamont Drive, Grass Valley. I'm a member of the CEA Foundation. I'm a 21-year resident of Grass

Meet-13

Valley and a retired aerospace engineer with a master's degree in systems analysis and electrical engineering. My experience has been in systems analysis and systems integration, and as a past member of the Nevada County - - I was involved in the publication of a report on the air quality in Nevada County.

Meet-13

Nevada County current gets an F rating when it comes to air quality and we have twice the state average of lung disease. Fugitive dust from rock crushing and transport, diesel exhaust from constant truck traffic, and the presence of asbestos fibers and dust will make a bad situation much worse. The DEIR does not adequately discuss these impacts.

Meet-14

The issue of controlling fugitive dust during construction activities is not adequately addressed beyond keeping the roadways wet or suspend operations when the wind blows. The issue of diesel exhaust from constant truck traffic is not

adequately addressed beyond using equipment with tier 4 engines, but only on equipment owned by Rise Gold.

There will be pollutants and toxic particles generated underground by drilling and blasting that may be exhausted from the headframe vent stack. Those pollutants consist of toxic airborne contaminants, asbestos fibers, and silica dust. Mitigations are proposed to prevent this but they are not adequate. The ASUR plan attempts to minimize asbestos fibers and fragments from being carried to the surrounding environment but this is a plan, not a mitigation.

Meet-14

Rise Gold owns more than 2,500 acres of mineral rights and has drilled 19 exploration drill holes for asbestos sampling and ore assessments. The sampling analysis and test results are questionable. There is an inadequate discussion of the sampling process itself. How are tons of rock left sitting in a silo until testing

Meet-14

has been completed be kept safe from the release of toxic materials? What happens when multiple loans of--loads of mine materials exceed the asbestos threshold?

Finally, additional air quality monitoring stations have not been proposed to accumulate pollution data, to measure how well the mine is performing with respect to air quality criteria.

This is just the tip of the iceberg considering air quality impacts. To the county staff and Planning Commission, you must continue your due diligence...

GREENO: Thank you, Bill. We appreciate your, your comment.

Meet-15

HUBBARD: Good morning. My name is Bob Hubbard [phonetic]. I am a resident of Grass Valley, living on property directly adjoining the Brunswick industrial site. I am a retired symphony musician, taught at Stanford University. And I am also a machinist operating a small manufacturing business. So I fully understand both sound

and measurement. I am a member of CIA--CEA, pardon me.

[Laughter]

HUBBARD: The DEIR noise evaluation is riddled with inaccurate data, false assumptions, and pure conjecture used to invent conclusions about reality. For instance, the ambient sound levels measured and used for the study date back to 2017-18. This is inaccurate data. The ongoing consequences of this project will not be known until after the initial construction is finished and the operation of the mine commences, easily four to five years in the future.

Meet-16

The studies should look at projected future neighborhood growth and make a reasonable evaluation of additional noise in the context of future ambient conditions in which the mine will be operating.

The study chose to measure the sound levels of the nearest receptors, the neighboring parcels of the property owners

homes, which are located the greatest distance from the source of the sound. The true impact of the noise on these parcels can only be determined by measuring at the property boundary. According to the county general plan, the decision to measure at the boundary is a county decision. So I am asking the county to make this a requirement.

Meet-16 The wording of the study is such that any level of noise that would not get the operated cited for a noise violation is acceptable. I have measured the noise level of the garbage truck collecting my garbage at 39 decibels inside my house. The study says the constant and continuous noise level of the Brunswick site will be 85 decibels, more than 20 times that loud, from 6 a.m. to 10 p.m., seven days a week. Think about how far away you can hear that garbage truck and ask yourself if you want that noise to be a constant part of your life.

Meet-17 The study dismisses the nighttime noise levels as not significant but that

Meet-17

conclusion once again is based on estimated data, and does not take into account that nighttime is a rural--in a rural residential area is not the same as nighttime downtown. It gives the surrounding community eight hours of lesser noise each day. So you better get to sleep at 10 if you want to get your rest. We retired folks don't live on the clock. We have a quiet, rural neighborhood.

Meet-18

Despite the study's denials, there is wildlife living on our property and the mine property. Deer wander the neighborhood freely. There is a resident owl who hoots softly in the evening. We have a neighborhood bear that visits from time to time. The operation of this mine will drive the wildlife away, and that and the associated noise will totally change the character of the neighborhood and much of Grass Valley from a peaceful, rural setting, to a noisy urban industrial complex, totally unlike it is today.

The DEIR must be redone to address these and other issues. Thank you.

GREENO: Thank you, Bob. Cellphones, there's an off switch on the side of them. Please use it.

MALE VOICE: Could you have the speaker microphone turned up? It's very hard to hear.

GREENO: Did you get that, Shelly or Jeff? If we can bring the speaker's microphone up?

SHELLY: Unfortunately that is the volume of the speaker for the feedback. So if we can get everyone to just speak a little bit higher, please?

GREENO: Or pull the microphone in. Go ahead, sir.

Meet-19

RAVINES: My name is Don Ravines [phonetic]. I've lived in Nevada County for 18 years. I have now lived at 108 Bridger Court in Grass Valley for the last eight years. I worked as a system analysist for 44 years managing the software company

consulting with large banks and Conservation Chair at Sierra Foothills Audubon Society. I am a member of the Nevada County and Grass Valley Energy Action Plan working groups, Coordinating Chair of Nevada City 100% Renewables Committee. And I'm a member of the Community Environmental Activist Foundation.

In 2018, Nevada County adopted an energy action plan to assist the county in implementing the energy goals and policies in the county's general plan, and inform the community of best practices that will help them save energy and money. The energy action plan calls for a 51% reduction in greenhouse gas emissions for electric use-- electricity use by 2035, which is in close alignment with state goals. The plan forecasts residential energy reduction savings from building efficiency of 42 million kilowatt hours per year.

Meet-19

The DEIR states that the amount of electricity required to operate the mine

Meet-20

would be approximately 49 million kilowatt hours per year, which would erase any residential electricity savings obtained by the plan. Even more stunning when you know that the total nonresidential electric use of the county in 2017 was 53 million kilowatt hours a year. So this one mining project would almost match all other nonresidential electricity use in the county and wipe out the projected nine million kilowatt hour a year's nonresidential efficiency savings.

Meet-20

Asking residents and business owners to cut down their use of electricity while allowing the electricity use of the mine would be highly counterproductive. The DEIR must explain how the project intends to comply with the goals of the Nevada County Climate Action Plan.

Emissions standards, for the years 2033 to 2102, the DEIR shows 9,000 metric tons of annual greenhouse gas emissions and declared them to be under the threshold of

Meet-21

significance. The DEIR seeks to justify its chosen significant threshold of 10,000 megatons of CO2 for operational greenhouse gas emissions by looking to other air district standards. This standard from other air districts was based on old California requirements and is not consistent with SB-32 statewide greenhouse gas reduction goals for 2030 and beyond.

Meet-21

The DEIR must use a significant threshold that will achieve California's new statewide greenhouse gas reduction goals over the proposed 60 year lifetime of the project. Considering state goals and the severity of climate change, any operational greenhouse gas emissions over existing conditions are significant. The project should be net zero, so it will not mitigate these critical impacts below the significant level.

GREENO: Thank you, Don.

Meet-22

BRIARS: Morning. My name is Ray Briars [phonetic] and I live on Northview

Drive in Nevada City. I've got a BASC in electrical engineering, 38 years of engineering experience in the TV products industry, and I've been 14 year in retirement. CEA is one of my volunteer activities.

Meet-22

Water quality, the hydrology report repeatedly uses discharge screening limits and data from the new Brunswick shaft to define water treatment criteria. Unfortunately, this information is outdated since it was from only one sample. The same report's analysis show that water flow from the near, near the surface seeps into that shaft, goes down into the mine, and flows, flows out over a mile away from the point where the mine drains into Wolf Creek near Centennial Drive. A more accurate sampling would be from locations where the water has actually flowed through a part of the mine.

Meet-23

A couple of sample sets were taken from the drains in a single month of 2018. These samples indicated higher--high levels of

iron, manganese, arsenic, aluminum, and zinc, than the new Brunswick shaft samples. These values today exceed safe water quality standards and the contaminated water continues to flow into Wolf Creek.

Meet-23

The DEIR has not provided enough information to correctly assess the potential water quality impacts from the mine. The only accurate way involves testing samples from regions within the mine itself. The current DEIR assessment of water quality impact is inadequate. Concerns must be evaluated and recirculated for public review.

Meet-24

Explosives, on page 4.7-28, the DEIR specifies no mining proposed closer than 500 feet from the surface. Thus, explosives in transit would be at least as far from the surface. This makes no sense since one of the more--one or more years of construction activity will require explosives prior to the construction of the longer term storage facilities underground. The DEIR fails to

identify quantity, type, or management of early phase explosives during construction. This must be identified as a significant impact that cannot be mitigated.

28,000 pounds of explosives would be stored underground at any given time. Approximately every two weeks, trucks carrying explosives will be taking the offramp from Highway 2049 at Brunswick Road and driving through the heavily used intersection, past the new Loma Rica development, and then under the airport. This is defined in the EIR as a significant impact which can be mitigated but the mitigations are inadequate. It must be listed as significant and unavoidable.

There is substantial community concerns about impacts to the airport and the air tankers that keep us safe during fire season. Many other significant issues with explosives cannot be mitigated.

Meet-24

GREENO: Thank you, Ray. We will be breaking for lunch at 12:00. How are you

guys doing for that schedule? We'll make it? Okay, go ahead.

BLANCHARD: Good morning, Commissioners. My name is Jillian Blanchard [phonetic] and I'm a member of CEA. My home is 19159 River Crest in Grass Valley. And thank you for taking the time to listen to us today. I have been a land use attorney for over 20 years and I have grave concerns with this draft EIR. I'll send a comment letter with details but I want to focus today on two fatal flaws. First, the failure to identify and analyze the full project. And, second, the use of a future baselines that assumes the cleanup of Centennial has already happened but it hasn't.

Meet-25

CEQA requires the draft EIR to identify the whole of the action as a single and complete project, to analyze all potential impacts. It prohibits expressly any attempt to separate out a portion of the project mainly because doing so leads to an underestimate of impacts and does not inform

Meet-26

the public of the actual damage this project will cause. The draft EIR fails this basic CEQA requirements by segmenting out the Centennial cleanup from the project which results in an undercounting on impacts.

The draft EIR approach feels a bit like a bait and switch from what was promised to the public originally. The NOP identified the Centennial cleanup originally as a, quote, "essential part of this project that would be analyzed in this CEQA document."

Meet-26

The project involves, as you know, placement of mine waste onto 44 acres of the Centennial site which can only happen once it's cleaned up by Rise.

So it's a necessary part of this project. But, incredibly, the draft EIR removes this huge component of the project and assumes that all of the grading, truck traffic, air quality impacts associated with the cleanup at Centennial, including impacts to four acres of wetlands, has magically already happened.

Meet-26

During this--doing this allows the draft EIR to ignore critical impacts including cumulative impacts of the Centennial cleanup. For example, the draft EIR assumes that half of the Centennial site has already been disturbed by the cleanup, which conveniently cuts the biological impacts in half. The design itself may change. It is still under review by DTSC. It has not been approved. And the cleanup definitely has not yet happened.

CEQA requires the whole project to be reviewed together, to get an accurate picture of impacts from the mine waste. What's worse, the draft EIR assumes that the cleanup has been completed for five environmental impacts, but then assumes it hasn't been done for the remaining eight. This approach is dangerously inconsistent and does not comply with CEQA.

In over 20 years of land use practice, I have never seen this done. It exposes the county to significant legal liability and

allows Rise to play a shell game, hiding impacts between the two projects. To protect itself and this community, the county must include the Centennial cleanup and recirculate this draft EIR. Thank you.

Meet-26

GREENO: Thank you, Jillian. Good morning.

OBERHOLZER: Lori Oberholzer [phonetic], 310 Nevada Street. I'm a CEA board member and a 37-year resident of Nevada City. I served on the City Council and Planning Commission for 19 years with the term as mayor. And I'm also a city and environmental planner. And as a consultant I have written many EIR's throughout northern California for the past 30 years.

Meet-27

You've heard a number, many of our members just now, conclude that the DIR-- DEIR has underestimated the impacts of the mine and these extension--extensive additional reexamination, analysis, and mitigation measures. So here is a quick summary of some of the points we've just

made.

Surface water quality impacts are underestimated, including drainage reaching Wolf Creek with excessive levels of iron, manganese, arsenic, aluminum, and zinc. Groundwater and well impact discussions are inadequate, including ignoring the impacts to most well owners and an unreliable groundwater model in our fractured bedrock system which affects groundwater flow, as many of us know firsthand.

Meet-28

The air quality section lacks adequate mitigation to protect workers and the public from adverse health impacts associated with the most feared constituents of mine dust, asbestos and silica. The greenhouse gas and energy use sections are also severely lacking. The DEIR neglects to make it clear that this one mining project using 49 million kilowatts per hour of electricity would erase any residential electricity savings attained by the Nevada County Energy Action Plan.

Meet-28

Nighttime noise and vibration and sleep disturbance, plus impacts to residents from a substantial increase in the very quiet ambient noise in the area are dismissed. And also long term impacts to 24 hour noise exposure over the entire lifetimes of area residents has also been not evaluated.

Meet-29

The DEIR also needs to explore a wider range of alternatives, including an alternative land use that better reflects our community needs and which can eliminate these impacts and the many other impacts that are likely to be revealed in the final EIR after the comments received today are evaluated.

Meet-30

And finally, again, we simply do not understand the complete exclusion of the Centennial waste cleanup site from the DEIR discussion. This is a major flaw.

Meet-31

The DEIR clearly will need recirculation after it is revised. I do hope that the Planning Commissioners will also take the opportunity today to ask the

Meet-31

consultants to bring back additional evaluation that you personally think is particularly needed. And we hope that our comments today will help you to be better informed on this community changing project. Thank you.

GREENO: Thank you.

Meet-32

HUBBARD: Hi, I'm Christy Hubbard [phonetic]. My address is 12966 Mink Court, in Grass Valley. Today I'm talking as a representative of the Wells Coalition. And we're a group of well owners in the vicinity of the mineral rights area of the Idaho-Maryland mine.

Meet-33

After reviewing the DEIR, we feel the well mitigation plan is not adequate. A key concern is that the county has failed to adequately define the true area of potential impact. The report repeatedly acknowledges the high level of uncertainty in hydrological models. You've heard a lot about that today and you'll hear more I'm sure. And yet the applicant has a

mitigation plan for only 30 properties. There's no acknowledgement of risk or plan to safeguard domestic wells in the surrounding area.

Meet-33

Since public records tell us that there are roughly 525 private wells within a half mile of the mineral rights boundary, this is a significant concern. Bear in mind that this project is asking for an 80 year use permit and there's no reason to believe that Rise Gold will constrain their mining to one small area for the entire amount of the time.

Meet-34

Consider this scenario. One day a homeowner turns on the tap and there is no water. It would be nearly impossible to prove that the mining operation caused damage because there is no plan to keep a reliable record of the well use or the well history. Neighborhoods would need to find immediate funding for water trucks and likely hundreds of thousands of dollars to connect to NID for a long term solution. And based on current estimates it would take

years to get--to restore that water service. And, furthermore, selling their home during that time would not be an option because a home without water is of no value whatsoever.

Meet-34

This is not the first time Nevada County has faced concerns about wells in the area of the mine. The last time it happened, however, the county provided a much more comprehensive system of safeguards for nearby residents. In 1996, Emperor Gold was granted a use permit to dewater the mine for exploration, which was--which required protections for wells in a designated study area.

Meet-35

In addition to the NID hookups for the homes on Bennett Road, it included multiple years of well monitoring, a community relations program, retention of an independent groundwater consultant, preapproval of all NID connection permits, and cash, bonds, and security to cover expenses for replacement water. All of this was done for a five year--for five years of

exploration. It didn't include 80 years of mining.

Meet-35

On behalf of myself and well owners in the vicinity of the mine, we respectfully request that the final report provide significantly better safeguards for well owners. The potential impacts to well owners has been recognized by experts and these impacts must be addressed by CEQA. The final report must fully identify the potential impact area and articulate a complete set of safeguards. This county has done better for us in the past. Given the enormous scope of the project, we need a much more comprehensive plan for the future. Thank you.

Meet-36

GREENO: Thanks, Christy.

GERWIG: Good morning. My name is Katherine Gerwig [phonetic]. I live at 11147 Squirrel Creek Road in Grass Valley. I've done extensive traveling all over the country. I settled in Grass Valley because it's one of the nicest little towns I've

Meet-37

Meet-37

been in. I like it here and I'd like to stay.

However, the noise level, I don't think anyone in grass valley that lives here knows when the fair is here or doesn't know when the fair is here. And they stay below the noise level. You can still hear them and all those trucks. You can still hear them. Below noise level, fine, but not low enough. And we'll have to replace the roads as well because of all those roads--those trucks.

Meet-38

The iron, mercury, cyanide, and arsenic are important to be able to separate the rock from the gold, and will be used. Too bad Erin Brockovich isn't here today because if you want to drink that water after it's been purified, go ahead. That's going to be going down Wolf Creek, right in the middle of Grass Valley. And that's a little poisonous to me. And I'm sure you can find a DEIR where that may be good. It may be. Do you want to drink it?

Meet-39

The noise level, I mentioned that. I'm

Meet-39

trying to do this fast. The fault, at one of the first meetings we went to with Mr. Muscleman [phonetic] and his group showed a diagram with - - a big fault where they're going to be blasting. I said, "Mr. Muscleman, isn't there a fault there? Isn't that an earthquake fault?" He said, "Oh, it's not important. We won't put it on anymore maps. We didn't mean to put it on that map." Well, that will solve that. Right?

I've had people tell me they're-- they're having sinkhole problems on their property, their land right now. They're adjacent to his mining because the testing their doing. This--they haven't even started yet and they're already having sinkholes.

I'm sorry. This is not a good idea. I like this little town and I'd like to stay here but I can't stay here with all the dirt that's going to be there, with the new roads we have to put in, the noise levels. And

the jobs--sorry, the jobs are going to be truck drivers. They're going to import their own people. They're going to import their own food. It won't help grass valley. It will help them, not us. And will he continue it? I don't know. Thank you very much. I don't want this mine here.

Meet-39

GREENO: Thank you, Katherine.

GRANT: Hi there. My name is Kellan Grant [phonetic]. I live at 10006 Parkview Lane in Penn Valley. I'm a homeowner. I'm here to share my--share my grave concerns about the proposed DEIR which was supposed to provide critical real world information to the Planning Commission and to the community at large about the real impacts of this proposed mine and that it will have on our air, on our water, on noise, and in general on our quality of life here in Nevada County.

Meet-40

These impacts are not theoretical. We have a lot of historical data about the impacts of hard rock mining, much of it from

right here. Concerns about these very real impacts are what brought me here today and I think a lot of these people. And yet the DEIR, in an effort to provide--as an effort to provide real world data, is woefully inadequate.

Meet-40

It vastly underestimates the impact to local wells, certainly in the number of wells. Even the NID board expressed doubts about a number of wells effected as low as 30. It decouples the theoretical proposed cleanup of the Centennial site, considering it a fait accompli, a separate matter, throwing the impacts of that site completely out the window. The noise pollution assessment takes into account initial construction but what about blasting, hauling, dumping 1,000 tons of wastewater and tailings a day?

Meet-41

The data in this report does not reflect reality. It has to be revised and it has to be recirculated. We have data on how air quality affects kids lungs. We have

Meet-42

Meet-42

data on how mine waste destroys groundwater, destroys streams, contaminates. We also have a lot of data about Rise Gold and their history of broken promises, of fudged data, and of environmental disasters that they've left behind and just walked away from. We have data about their disregard for the concerns of local communities.

GREENO: We, we do need to keep this on the DEIR.

GRANT: Absolutely.

GREENO: Thank you.

Meet-43

GRANT: Look, the impact on groundwater alone, water is more precious than gold in Nevada County. It just is. And the impact on water alone warrants a reevaluation, a reassessment, and a recirculation of this report. We cannot get this wrong. If we get it wrong, it will be an absolute disaster not just for Grass Valley but for the whole county. The report does not reflect reality. It's inadequate and it needs to be revised. Thank you.

GREENO: Thank you, Kellan.

BAKER: Yeah. I'm Steve Baker [phonetic], 13975 Wings of Morning Drive up in Nevada--in Nevada City, top of Banner Mountain. I've lived there for 26 years on a well. I'm commenting on the risk to the private domestic water wells created by this project. My background is unique to the issue of private wells. I'm a California registered geologist, certified hydrogeologist, been doing hydrogeologic work for 42 years. Completed a ten-year groundwater study in our county, Nevada and Placer counties, and looked at the domestic well vulnerabilities. Also, I submitted the draft EIR comments for the Banner Mountain Homeowners Association back in 2009, when Emperor Gold attempted to open the mine.

Meet-44

Based on what I've read in the draft EIR, I am concerned about the community. Dewatering the mine and its impacts on domestic wells is currently, based on this draft EIR, undefinable, unpredictable.

Meet-45

Meet-45

There are some fundamental data sets that are biased, that were used and they're hanging their hat on. And the monitoring data is not long enough in duration and its resolution is not nearly good enough to be useful for answering these types of questions.

I'll first answer what's wrong or missing, and then we'll go into what we can do about it. Okay? Rise Gold has four data sets. They used the Emperor Gold's groundwater monitoring data, '95 to 2007. 2002 was missing. The problem is they only sampled water levels once a month. That's not enough. You need high resolution data to get any useable, reasonable information out of it. And you've got to remember this is an 80-year project. Okay? We need long data sets if we're going to make predictive opinions, provide predictive opinions.

Meet-46

The precipitation data and the water levels in the Rise Gold mineshafts, okay, they used daily precip data and then they

Meet-46

used 15 water level readings throughout a 16 year period of time and concluded that there wouldn't be an issue. Same problem, the resolution, the frequency of sampling, it's not long enough.

The computer numerical model, though you've heard about by some past people here, it's not the right model. It's the wrong tool. I mean if you--if you have a job that requires a hammer but all you have is a screwdriver, I think they use a screwdriver.

Meet-47

It doesn't help solve the problem. The mine, the numerical groundwater mines--or models are great for answering some of the questions on this project but not this question. They're, they're of no value.

We need details on this one. And what is missing is they use well completion reports and they use static water level readings. What they needed to look at was the pumped water level dips and the shallow most productive fracture dips. Those are the critical data points and that wasn't

even talked about, not even considered.

Lastly, Rise Gold, they followed the conclusions of the USGS back in 1984 regarding groundwater in fractures. And, and if you would reiterate that, 70--25% or more of the wells that were producing greater than five gallons a minute were actually below 215 feet. Thank you.

Meet-48

GREENO: Thank you, Steve.

MALE VOICE: Chair Greeno, may I just ask to check in and see what number speaker we are on for information for people outside of this room?

GREENO: You're--14.

BEAR: Commissioners and staff, I am Jim Bear [phonetic], 128 Sierra Blanca Court, Grass Valley. And I'm honored to see you again and I particularly empathize with you because as a former Planning Commissioner for Grass Valley I think you have a hell of a job ahead of you. I'm--I've been a scientist at Stanford Research Labs and Bell Labs, and have applied my experience to

Meet-49

evaluating the DEIR. I'm also a business owner in Nevada County.

Rise Gold is claiming that science and the DEIR proves their proposal is safe for Nevada County. Several scientists, including myself, find that to be false. Our extensive analysis of the DEIR concludes that numerous mitigation measures will not lower the impacts to less than significant as claimed.

Meet-50

For me, the most important impact is air pollution because it will endanger many people far from the mine, miles from the mine operations, just as wildfire smoke affects the whole region. While diesel exhaust will have unmitigable negative impacts, it is asbestos and silica that are most dangerous to us. Airborne asbestos leads to cancer and eventual death.

So there will be harmful--will there be harmful airborne asbestos? The DEIR finds asbestos in about 32% of the drill hole samples, represent--representing rock that

Meet-50

will be brought to the surface, but 19 drill holes providing 40 samples cannot possibly represent 2,085 acres of mineral rights. That's one sample per 65 acres. That's generalization from insufficient sampling. There's probably a lot more.

Unfortunately, asbestos fibers are very small, about five--about .5 microns. Being submicroscopic leads to harm. Asbestos cannot be filters, can travel indefinitely in the air, and penetrates deeply into the lungs. The DEIR mitigations treat asbestos as dust that can be kept out of the air by spraying water, washing vehicles, tarping the hauling trucks, etcetera.

The proposed mitigations are actually copied from the California Asbestos Airborne Toxic Control Measure which is for visible dust emissions. I suggest no one will see particles one millionth of a meter long. Dust is visible. Asbestos is not.

There are dozens of other issues such as the need for testing the three million

Meet-50

pounds of rock excavated every day. I conclude as a scientist and a 20-year county resident that air pollution from the proposed project cannot be mitigated. Thanks.

GREENO: Thanks, Jim.

Meet-51

SHAY: Morning. My name is Mike Shay [phonetic]. I live at 11069 Cedar Ridge Drive. So the mine is in my backyard. The other side of my backyard fence is the mine property. So I'm going to talk a little bit about noise. I know it's been covered but I'm going to give you some specifics about why the draft EIR is insufficient.

Meet-52

So according to the noise and vibration study that was used to create the draft EIR, figure three shows my house as number 28. Table 6 in that study says the ambient daytime noise at my house is 51 decibels. And according to the study, the engineered fill operation is going to take place 500 feet behind my house. And currently there's just forest back there. There's no

Meet-52

mechanical activity. There's no human activity. So the 51 decibels that I'm hearing has got to be from Brunswick Road because that's the only place that noise can be coming from.

So the study says the following equipment is going to be used to place the engineered fill. So diesel haul chucks-- trucks that are going to dump between 50 and 100 20 ton truckloads out of steel beds 500 feet behind my house, bulldozers, motor graders, excavators, compactors, water truck, a front-end loader, and mobile auger blending plant. And Table 17 of the study predicts that all of this equipment will generate only 47 decibels.

[Laughter]

SHAY: So, so that's, that's less than what I'm hearing now. I find that inconceivable.

And I'll go on. According to the noise and vibration study, the mineral processing will take place 2,000 feet from my house.

Meet-52

Table 6 says the nighttime noise at my house is 44 decibels. Well, I didn't know that. I thought it was quiet. I'm going to have to shut my window at night now because it's so loud. I didn't even realize it.

Table 22 has predicted the cumulative noise from all nighttime mine operations will between--will be between 26 and 29 decibels at my house. Once again, it's 44 decibels now with no mine, but when the mine is there it's going to be even quieter. Isn't that wonderful?

[Laughter]

SHAY: You can call me dumb, but I don't understand how hoisting over a half a ton of rock per minute--so if it's 1,000 tons per day, if you do the math, it comes out to a little bit over a half a ton a minute. They're going to take half a ton a minute, 85 feet above the surface, drop it into the steel lined concrete silo, then put it on a conveyor 335 feet to a processing plant, grind it down. And all of this is

Meet-52

going to be quieter than it is now. Doesn't make sense to me and I maintain that the noise study that this--these figures came from are, are inadequate. They need to be redone. Thank you.

GREENO: Thank you.

COLBY: My name is Ricky Colby [phonetic] and I live in District III. I did live in District V for 45 years and I want to tell you in my experience dealing with an underground gold mine called Siskon Gold Corp. Labor Day weekend, 1995, we heard the sound like an explosion. It rocked my house. A short time after the

Meet-53

Siskon deepened Grizzly Hills Well, the day they tested Grizzly Hill Well to see how fast it recovered, my well started having problems. On September 17th, in the a.m., I had horrible, undrinkable water. And by afternoon I had no water at all. So I'm that person that I was a well owner who turned on their tap and there was no water.

We had an Environmental Impact Report

that sounded a whole lot like this Environmental Impact Report. Siskon Gold Mine was always out of--out of step with their--the way they were supposed to handle things and they let it slide. This story goes on and on and on, and I can't tell you all of it.

But this mine is going to operate for 80 years. Just think what they can do. Siskon had one accident. It blew a hole in our aquifer, an F-16 fault. And they're going to go on for 80 years. How many accidents like that can they have in that 80 years? And how are they going to fix it? They're not. They're going to have a big accident like Siskon did. Then they didn't have enough mitigation money to cover all of our expenses. And they're going to pack up, go away. Siskon took out bankruptcy. We ended up having to clean up their mess.

The cost of water NID is going to raise just because of the drought, let alone the amount of money that they're going to take

Meet-53

for this. At least Siskon was able to plug the hole and some of the old wells come back and some of the new wells revived. And what they did when they revived is the clay turned to powder while it was being dewatered. And the heavy minerals, when the water came back in, rushed into our wells. And I had to go through chelation for two years for aluminum poisoning that filled my, my new well up. I had to have two filtration systems.

Meet-53

GREENO: We, we appreciate your comment. The project comment will come later. If you have anything else on the EIR, please present that at this time.

COLBY: Well, I don't think their water plan is adequate, basically. I, I think there's surprises and I think that my Planning Commission at that time didn't realize what kind of damage could really be done. And I wanted you to know that there can be...

Meet-54

GREENO: Thank you so much.

TURNER: My name is Martha Turner [phonetic] and I live at 10860 Dolores Drive, Grass Valley, supervisor District III. I'm a retired nurse practitioner, nurse midwife, and I am not, as Dawn Rogers [phonetic] referred to as a busybody. I've lived most of my--most of my time in Nevada County since 1960. I was a forest service firefighter as a young adult and in 2015 we lost our fire--our home, rather, to a forest fire. This--which makes this subject dear to my heart.

Meet-55

My DEIR comment today is condensed from ten pages that I've written as a written comment on the chapter of 4.13, titled, "Wildfire." And I request that the following matters be further reviewed by the Planning Commissioners before a recommendation is made to the Board of Supervisors.

I was not reassured by what I learned. The report suggests that the mine site is immune to dangers of a wildfire and yet

Meet-56

there is forest on both sides. And the Bennett fire in fact burned a number of acres on the Centennial site just last year.

The report minimizes the risk of fire in our region. In fact, there have been 16 fires in our--in Nevada County since 2015. The report does not adequately address how mass evacuation of residents, along with the additional 312 mine employees, will be handled.

Meet-56

Quite disturbing is a statement that in the event of a wildfire fire officials will request that the mine shut down. What sort of authority or enforcement is in the word "request?"

While fire--while truck traffic is recognized elsewhere in the DEIR as significant, in this part of the DEIR it states that the impact of truck traffic is less than significant in the event of a wildfire. This makes no sense.

Meet-57

There is no discussion in relationship to wildfire about the trucks carrying the

Meet-58

explosives through town, or the transferring of these explosive materials before they are stored underground. The report contends that the vegetation management plan become-- makes wildfire danger insignificant. Our home had a well defined defensible space and it still burned to the ground.

Meet-58

The report states that the presence of 24,000 gallons of diesel fuel on the site will have no potential for fire danger or environmental catastrophe, no potential.

Meet-59

It also states there will be less than significant risk of flooding, even though it acknowledges that mine tailings do increase water runoff. What happens to the homes located along Mill Street, that we see along Wolf Creek? We've all seen those backyards being flooded when the creek rises. Yet there is no consideration of the impact of an additional 1.2 to 3.6 million gallons of water each day going into the creek.

Meet-60

I ask that my--I focus this analysis on the chapter and along with common sense

Meet-61

Meet-61

tells me that what it's saying is not accurate. Thank you.

GREENO: Thank you, Martha.

HALL: My name is James Hall, HALL. I live at the intersection of Mink Court and Beaver Drive, just south of the mine site. I became aware of the arrival of Rise Gold into the area in the spring of 2017, when I was awakened at night by two loud explosions. Spent me weeks to find out that Emperor Gold was gone and we had a new company.

Meet-62

I spoke about noise problems that I was having in the fall of 2017 before this Board. They have been ongoing ever since then. My concern is lack of sleep and how it affects the body. Not mine so much. I'm 95 years old and I won't hear it much longer but my neighbors and children will.

It's a continuous, ongoing rumble under the house. I've attempted to contact my supervisor without any luck but I'm not quite sure of what the answer is. I'm not satisfied that Rise Gold says that they're

Meet-62

going to mitigate the problem since I've had the problem for five years and supposedly there's not even anything going on underneath the house. But it goes on, on the average of 12 to 16 hours a day on a nightly basis. And I think it's going to need to be stopped.

It's just going to be--if we're having this much trouble with no mining, I hate to think of what it will be when it gets on in the future. So I hope that this organization and the people can do something about it. Thank you, very much.

GREENO: Thank you, James.

Meet-63

PEROZI: Hello. My name is Gary Perozi [phonetic]. I live at 13997 Emerald Court in Grass Valley. I'm a well owner and my home is located above the Idaho-Maryland Mine mineral rights area. I've lived int hat peaceful and beautiful area for over 30 years and I'm also a member of the Wells Coalition. I live in District III.

After reviewing the DEIR well

Meet-64

mitigation plan, I'm concerned about impacts to my well and other wells in the area of the mine. The report provides protection for up to 30 wells along East Bennett Road but it doesn't lay out a mitigation plan for the few hundred other wells in the area. The report doesn't even acknowledge a risk to the other wells in the area.

Meet-65

The DEIR will--well mitigation plan states, quote, "All potentially impacted wells are located in the East Bennett Road area. Domestic wells outside this area will not be impacted." The re--end quote. The report fails to demonstrate that this statement is true. There can never be 100% certainty in a hydrogeologic model and what wells will and will not be impacted by dewatering of the mine. That's because the model is based on assumptions and predictions.

The hydrology predictions are a best guess effort because we really don't know for certain what the groundwater response to

dewatering in the mine will actually be, especially in fractured rock. Even the principal hydrologist for Itasca that worked on the hydrologic model for Rise Gold said in the February NID board meeting, quote, "With fractured rock there will always be uncertainty. And during my career there won't be any 100% confidence in predictions," end quote.

Meet-65

The DEIR is inadequate in that it does not sufficiently account for the uncertainty in the hydrologic--hydrogeologic models and assumptions, and fails to acknowledge the risk to all wells in the area. It also doesn't present an attainable plan on how to mitigate for those wells that fail, get contaminated, or are impacted due to the dewatering of the mine. We don't want a repeat of what happened in 1992 when the San Juan Ridge Mine hydrology report stated, quote, "Water wells and the water supply well surrounding the site are predicted to undergo very little or no impact to mine

Meet-66

Meet-67

dewatering," end quote. The hydrology assumption proved to be false and created disaster when three years later, the mining operation tapped a high pressure water-bearing fault line and flooded the mine and depleted groundwater.

Meet-67

GREENO: Thank you, Gary [phonetic].

HANSON: Good morning, members of the planning commission, staff, and members of the community. My name's Jennifer Hanson. I'm the general manager for the Nevada Irrigation District. I am here on behalf of the district as well as on behalf of our board this morning. We do have a comment letter that we will be submitting regarding the draft DIR, but we also thought it prudent to make our comments in person as well. The draft EIR did depict a potable water line being constructed in the East Bennett area in order to serve water to the 30 residents I did apply to be potentially impacted by the project. However, NID will also request that there is an

Meet-68

Meet-69

Meet-69

interconnection in the Whispering Pines area that was not contemplated in the draft EIR. And we would like to see that portion of the project be included.

Secondly, we have um, concerns related to the mitigation measures for the 30 properties that were identified to be potentially impacted through mine dewatering activities and specifically related to the mitigation measure related to requiring the applicant to pay for water consumption for those parcels.

Meet-70

In the water supply assessment, it was indicated that it was estimated that each one of those parcels utilized approximately .4 gallons per minute per dwelling. And in the draft EIR, the mitigation measure for consumption, for payment consumption is limited or capped at 400 gallons per day. And the .4 gallons per minute per dwelling is actually 576 gallons per day.

Meet-71

Additionally, we do not feel that it is appropriate that the mitigation measure be essentially expired at sale of

Meet-71

the property. And instead of running with the parcel owner, we would like the mitigation measure to run with the parcel itself.

We have additional concerns related to the estimated 30 wells that were estimated to be impacted through the water supply assessment as well as the hydrology work that was completed. As previous speakers have said, um all modeling is based off of a number of assumptions as well as data and unknowns that have to be included into the model. And so we would like to see the extension of the area of impact to be addressed through requiring the project applicant to provide financial assurance or some type of surety, whether through money in escrow or through the um, securing of a bond to also address any wells that would be potentially impacted in the areas of Wood Rose, Greenhorn, and Beaver areas. We have estimated that this potential cost if these wells were to be impacted would be in the

Meet-72

Meet-72

$14 million range. So we therefore respectfully request that the draft EIR require a mitigation measure that the applicant secure a bond to pay for any potential impacts in that amount for the five-year dewatering period. Additionally, since the operation of the mine will far exceed the initial dewatering period, it would be prudent to also include--

[Crosstalk]

HANSON: Oh, my time…

FEMALE VOICE: Five minutes.

HANSON: - - five minutes. I'm told I get five more minutes.

GREENO: Two more minutes, yes.

HANSON: Two more minutes, two more minutes. I can talk fast.

GREENO: Thanks, Jennifer.

Meet-73

HANSON: We also request that the, okay, we also request that the groundwater management plan require that the monitoring wells also be placed in the area and be placed at the average depth of those wells.

Meet-74

And then lastly, our final comment is related to the Wolf Creek discharges. We do serve well over 700 irrigation customers, and obviously water quality is utmost important to us. But we also request that mitigation measure be placed within the draft EIR. That requires um, daily monitoring and public availability of water discharge data so that we can ensure there are no storm water impacts associated with capacity. There is limited capacity on Wolf Creek. And if we are not monitoring those discharges, it can easily become overwhelmed during a storm event. And with that, I sincerely appreciate your time, and thank you for the extra two minutes.

GREENO: Thanks, Jennifer.

Meet-75

HUCK: I'm short. Um hi, my name is Theresa Huck [phonetic]. I live at 11536 Lower Circle Dr. in Grass Valley. I am speaking to today on a different subject that is located in 4.7-1 in the summary table of the draft EIR regarding the impacts

of human health. There are significant and unavoidable impacts to human health that cannot be calculated by this draft EIR. I rented a home on the Lava Cap Mine site in 2010 when it was filed as a Superfund site. At that point in time, someone was supposed to knock on my door and tell me that I was living on such a site, but that did not happen. And my son and I as a result, ended up with life-altering mercury poisoning and will be living with that for the rest of our lives.

Meet-75

This draft EIR cannot possibly look at 80 years of mining and how that will impact human health. And the main and concise point I would like to make to you today is that we are no longer an industrial community that can continue to mine at the expense of the residents who live here. I would like to thank you very much for the effort you put forth and for honoring our rights as citizens. And I would really, really like to request that the draft EIR be

redone in whatever way, I'm not educated in these matters, to truly look at the impacts of human health, not only in dewatering of mines, but in groundwater modeling, understanding that a storm changing that can change the flow of mercury and arsenic, cadmium, chromium, and lead in our water. We are already living with that legacy, and we as a community do not know how to deal with the impacts from a legacy 100 years ago. So I ask you, please do not even reconsider this project until we know how to deal with that. Thank you.

Meet-75

GREENO: Thank you, Teresa.

NELSON: Hello, my name's Allison Nelson, and I'm a resident of District 4. I'm a biologist with a master of science, and I'm the director of Gold Country Avian Studies, so I respectfully request the full five minutes.

Meet-76

Um, the um, our organization focuses on avian research and education in the Sierra Foothills. The Idaho-Maryland Mine project

Meet-77

DEIR is deficient in that it does not adequately address significant impacts to the stretch of South Fork Wolf Creek that passes through Empire Mine State Historic Park and the meadow the creek transects, known as the Bennett Street Grasslands. More specifically, it does not address

Meet-77 significant impacts to the 98 native bird species that my organization has captured or detected in the grasslands, all of which are protected by the Migratory Bird Treaty Act. This list includes four rare special status species, including the critically endangered willow flycatcher. The DEIR is also deficient in that it does not address the simultaneous impacts of a 300-plus unit

Meet-78 housing development currently under review by the city of Grass Valley, which is proposed on Bennett Road between the Centennial site and the grasslands. The DEIR's biological surveys of the South,

Meet-79 South Fork Wolf Creek riparian area were also severely lacking. My understanding

from appendix F10 is that the only biological survey that occurred was a VES, during which two people walked the creek on August 29th, 2019. Not only is it likely that many amphibians were missed during this late hot dry time of year in a warming climate, but also there is no evidence that any bird survey was attempted. If so, bird vocalizations are almost nonexistent at that time of year, and locally breeding migrants could have already departed.

Meet-79

Since December 2016, I have run a year-round bird monitoring program in the Bennett Street grasslands, performed with a permit from the park and in conjunction with Bear Yuba Land Trust. The land trust holds a conservation easement on approximately 7 acres within the grasslands along South Fork Wolf Creek. At the grasslands, we perform detection surveys and run a monitoring station where we operate ten mesh nets to passively capture wild birds, then band and release them. The grasslands are a rich

Meet-80

biodiverse ecotone that connects a conifer-covered hillside, a riparian creek corridor, and a very wet meadow which drains from the hill where the Centennial site is located. At the Brunswick site, the project proposes to put its untreated wastewater into a vibrant pond rich with wildlife. After treatment, it will be, the water will be discharged into the creek, which flows downstream through the grasslands, where we run the monitoring program.

Meet-80

On page 471, the DEIR states California black rail is the only special status species that was identified as potentially occurring on the sites. And the technical memo for the biological resource assessment states the habitat associated with South Fork Wolf Creek does not provide suitable habitat for other CESA-listed species. This is absolutely incorrect. On at least 15 separate occasions, we have captured or detected California special status species, including yellow breasted chat, yellow

Meet-81

warbler, olive-sided flycatcher, and the critically endangered willow fly catcher, which as long ago as 2003 was estimated to have only 400 remaining breeding pairs. During four out of the past five years, we have captured more than seven willow flycatchers in the creek vegetation. In my NOP comment letter of August 2020, I listed three special status species observed in the grasslands, including willow flycatcher. And in March 2021, I also submitted to the county, to the county planning department a folder of all our California natural diversity database special status species submissions.

Meet-81

Therefore the DEIR is deficient because it does not acknowledge significant impacts to the, these special status species, and the analysis is also deficient because it did not consider relevant facts known to the county. Given that the grasslands are located between the Centennial site and the Brunswick site and across the street from

Meet-82

Meet-82

Meet-83

the proposed housing development, extensive additional studies need to be performed regarding the significant impacts that the project will have on the grasslands and the riparian corridor. These should include but are not limited to general surveys, general bird surveys, surveys of special status species, willow flycatcher-specific surveys during breeding and migration periods, research on impacts of temperature change and flooding that the creek may have on invertebrates, and studies on the effects of flooding on ground-nesting birds, of which there are numerous resident and migrant examples. Additionally, we have documentation of birds, bobcats, bear, coyote, mountain lions, and other wildlife moving freely between the grasslands in the area of the proposed housing development and the centennial site. And additional studies must be performed to identify the significant impacts that the additional traffic and noise created by the proposed

housing development and the mine project would have on wildlife, their migration corridors, and the aesthetics of the grasslands of Empire Mine State Historic Park.

Meet-83

I also want to clarify that a second meadow located on the Brunswick property also rich with bird life, and I have a photo here, uh lies directly to the east of the vibrant pond where the project will pump its untreated wastewater. Studies must be performed to determine if diverting water from this pond into a--

Meet-84

GREENO: Thank you, Allison. And uh, we will take ten more uh folks before we break for lunch, so if you would let the 11th person back know that we will reconvene, uh I'd like to do a 30-minute lunch break if that's acceptable to the other commissioners.

NELSON: I just want to let you know I have photographs of the - - and for all the commissioners, I have…

GREENO: Those will go in the EIR,

thank you, yes.

MALE VOICE: What number are we on?

GREENO: What number are we on? 23? You're 24?

GILLESPIE: I'm 26, and 25 is right behind.

GREENO: That's great, great.

GILLESPIE: My name is Becky Gillespie [phonetic], and I reside in District 1 at 14130 Banner Lava Cap Rd. I grew up in Nevada County and moved back here with my husband and children in 2016. I'm here today speaking on behalf of Earth Justice Ministries, a local nonprofit that brings a spiritual and moral perspective to bear on issues of our day and links concern for creation with concern for human well-being. We echo the concerns of everyone who is speaking out on the inadequacies of the current draft EIR. Today we focus on what is called aesthetics, the mine's cumulative impacts, and the need to repair harm done.

Meet-85

Meet-86

Aesthetics are downplayed as a concern in

the draft EIR, but beauty is a value. Beauty touches people's hearts and minds. It is Nevada County's natural beauty that brought so many of us here and that brings so many visitors, the sights, the sounds, the smells of this place, the taste and feel of clean water, the fish in the streams, and the wildlife. People come here to experience the beauty of the natural world, to experience a deeper reality that puts things in perspective. To many, that natural beauty is like church, reconnecting us to what is most meaningful in life. The draft EIR must adequately list in detail the mind's specific aesthetic impacts.

Meet-86

Mitigations listed in the draft EIR will not overcome the mine's cumulative impacts, which would work together to decrease our quality of life by increasing air and water pollution, dewatering wells, harming Wolf Creek, increasing greenhouse gas emissions, injuring plants and animals, raising noise levels, damaging roads, and yes, wounding

Meet-87

the beauty of this place. The final EIR must list in detail how these specific impacts act together and how Rise Gold addresses this cumulative damage.

Meet-87

Finally, there's still much damage to repair from the gold rush, including genocide committed against the Nisenan people and other nearby tribes. The earthen people were so damaged that the toxic legacy continues today. Healing from the past includes respecting the earth that gives us life, making reparations for harms done, restoring the land and air, and changing our ways so that we are in a right and good relationship with this place, its people, and creatures. We cannot heal from the past if we continue adding to the harms by opening this mine, thank you.

Meet-88

GREENO: Thank you, Becky.

KANE: Good morning, my name is Jeff Kane [phonetic]. I've lived in Nevada County most of my life. I'm a medical doctor, and I'm very concerned about air

Meet-89

quality. Our county's air quality as you might know is already terrible. Uh, the American Lung Association gives us an F grade for our ozone levels. We've all been, long been considered uh Sacramento's tailpipe as vehicle emissions there funnel to here. And wildfires, which will intensify, cause entire weeks that our air quality management district labels very hazardous. If you look at the DEIR table 4.3-19, it's on page 366, it's a list of toxic airborne substances that the mine will emit daily while all mitigations are in place. In other words, this is the best case scenario. Do the math, and you'll see that despite all mitigations, however effective, the mine will release 8.5 half million lbs. of substances known to be toxic and carcinogenic into our air over the next 80 years. We can't take this; we can't take this. Our mortality rate from chronic lung disease in this county is already double the statewide rate. One especially vulnerable

Meet-89

group is seniors, whose numbers are three times the statewide rate. Another vulnerable group is our children. They will absorb more toxic airborne pollutants than adults do because of their more rapid respiratory rate and their longer exposure during these eight decades. The report ignores impacts on the thousands of Nevada County residents who will be born during the operation of this mine and have no say in the issue.

Meet-89

The many mitigations that the DEIR specifies are too numerous for any agency to monitor or enforce or more importantly, to afford. In any case, the mining industry itself has a record of neglecting or circumventing mitigations as you probably already know. Again, we can't take this. The DER table 4.3-19 states that even if all mitigations are effective, the mine will significantly poison our air, inevitably sickening us. Nevada County cannot tolerate any additional air poisoning, thank…

Meet-90

GREENO: Thank you, Jeff.

ENGEL: Hi, my name is Larry Engel [phonetic]. I'm at 12116 Horseshoe Ln. Uh, that's above the mind that's underground in 2,500-plus acres that nobody's talking about sufficiently in the DEIR. Uh, they're going to remove my groundwater. This isn't an abstract question. Each of us on Banner Mountain owns our own groundwater. We have a right to compete for our water that's in the ground that they're going to ship 24/7/365 somewhere down the Wolf Creek, which is one property away from mine. Uh, I have filed a 120-page objection or am filing a 120-page objection, I'm waiting for some biology data, uh with 50 fatal flaws, and I'm going to mention just a couple of them. And I'm often using in that, which I urge you to read, the DEIR's own words against them particularly matched up against what they haven't talked about, which is the Rise uh Gold Corp. 10k and 10q they've filed with the SEC. They got to have consistent

Meet-91

Meet-92

messages, and if they're telling the SEC one thing and they're telling us something else in the DER, that's not good.

Meet-92

Uh, why consider my analysis? Uh, I'm a retired bankruptcy lawyer. Uh, I've worked at the, one of the nation's leading law firms with decades of experience in failed mines. I know as much about anybody as bankrupt mines. You want to know why there are 40,000 abandoned mines in California today that are on the EPA list? Go check it. I can tell you, and they start with failed uh mines with unrealistic uh DEIRs that become EIRs. And there's no economic feasibility. I know you don't want to talk about economic feasibility, but the courts will when we get to that. Uh, the uh,

Meet-93

let me hit the first flaw. I'm speaking quickly because I'm concerned about my time. The, the draft uses hexavalent chromium. Nobody's talked about that, CR plus 6. Uh, you may remember the old movie the horror reality movie Erin Brockovich. They killed

Meet-94

Meet-94

Hinckley, California with hexavalent chromium. You know, so they showed you this morning cement paste that they're going to put in the mine to shore up uh the, the old mine and the new mine, 24/7/365 for 80 years they're going to use this toxic hexavalent chromium. They don't talk about that. There's not a single mention of that chemical in the hazardous section of the EIR. Why is that? Why are they hiding that? Uh, if you if you Google hexavalent chromium, you'll find an infinite number of horror stories. If you check the EPA website, there are hundreds of - -.

GREENO: Thanks, Larry.

PRICE: I'm Charles E. Price [phonetic], Charles Price.

GREENO: You're on, Charles.

PRICE: I'm getting an echo. Am I getting an echo? Uh, I'm at 12655 Little Deer Creek Ln. in Nevada City, not the city proper, but the county. Um…

GREENO: Charles, I was uh informed

that you have a song, is that right that uh…

PRICE: Yeah, I do.

GREENO: Brings the EIR question to uh music?

PRICE: Yes, and I, I just want to uh say a little statement before I perform it that it clarifies. Uh COVID generated a work, uh place experiment, and corporations and workers alike have seen the benefit from working at home. Now Nevada County is competing for these well-employed professionals and their families who are migrating out of the state's urban areas. I don't see this draft document addressing the effect of proposed mitigations in total on our county's overall quality of life uh, for its residents, attracted to visitors, and potential new residents. Grass Valley and Nevada City are the cultural heart of Nevada County. Please demand a study addressing the total effect of putting a big mining operation in that heart.

Meet-95

Meet-96

Sorry, I got to sit to do this, but I

ran my hand over a table saw and I can't play guitar like I used to, so now I'm playing slide on my lap oh. Uh, going to have to do it fast here. Taking years and years to recover from the terrible, terrible gold mining scars. Generations of good folks working together to recover this beautiful county of ours. They'll pollute our water, pollute the sky. Homes will lose value; wells will go dry. 43,000 gallons of water a day here where droughts often come our way. Toxic waste don't get bigger by the hour, another big drain of our electric power. Don't let--sorry, don't have the time to finish this.

Meet-96

GREENO: Thank you, Charles.

PRICE: If you uh, go to Charlie Price, uh the YouTube, you can hear it.

GREENO: We know where it is, thank you.

O'CONNELL: Hello, uh good morning commissioners. Uh, my name is Itera O'Connell [phonetic]. I live in District 1, and I've lived in Grass Valley for 20 years.

Meet-97

Meet-97

And I uh, travel on Brunswick uh, next to this proposed mine project at least twice a day, so I'm extremely concerned about the truck traffic that will be unloaded onto our, our street. This will divide our community, so the environmental impact report does not really address how this will divide our tourist section from a major industrial uh, endeavor.

Meet-98

So we currently have uh, this area zoned as light industrial, and they want to uh waive that to be a major industrial. To me it should have stopped right there. This is a neighborhood, and this shouldn't even be something we're dealing with but here we are. This is also Nisenan on land. It is sacred, and I didn't see any interview with the Nisenan tribe. I've spoken with the Nisenan tribe, and they're opposed to mining this gold and taking this out of the country and taking resources out of our sacred land. So um, I would like to see the uh draft environmental impact report address the

Meet-99

Meet-99

Nisenan people. Uh, and that is under the uh, section of cultural and tribal cultural resources. It's a little line in the draft EIR, but it's not really dealt with.

Meet-100

Okay, so we also have, uh the trucks are not listed under the aesthetic section, but obviously a truck every 10 minutes at minimum would be um, definitely not aesthetic in our community. Uh, they list

Meet-101

the evacuation of these people as not significant or less than significant, and I beg to differ that 600 people trying to get out of a mine in an emergency and unloading onto one of our uh, roads that would for an evacuation, would be a significant issue.

Meet-102

The height variance has already been decided, no, no larger than 45 ft., and they want to go 165 ft. End of story, not happening, get the hell out of here. We don't want a 165-story building in our community. Uh, and also we don't want lights all night in our community. And they talk about that as not being significant. So this will put our

community at risk, uh that's already suffering from decades of mining, and it's time to put an end to this project, thank you for your time

Meet-102

GREENO: Thank you, Itera.

COULTER: Matthew Coulter [phonetic], Nevada County. I'd like to give each of you a lead pamphlet, a couple of lead pamphlets that came out at the--hello, you guys there? Howdy. I'm here; I'm right here. I took my day to come over here, okay.

Meet-103

FEMALE VOICE: They can hear you.

COULTER: Yeah, but are they even watching; do they even care? And that's what I want to start out with. So here's a lead document for you guys. Grass Valley's water doesn't even meet federal lead standards as it is, okay. We want to keep dumping toxic shit into our environment. Let's start with the meetings. No chairs, people sitting in the sun, many disabled elders, no parking. I watch the county stifle the citizens by doing this type of

Meet-104

Meet-104

thing and using attrition as a way to get rid of people that have a legitimate comment and a legitimate concern.

Much like the marijuana issue and the Centennial Dam issue with NID, this process is severely flawed. My personal history on Brunswick Road growing up, the spring for South Fork Wolf Creek started in our property there at Cedar Crest. Growing up, there were two 24/7 sawdust burners going at the mill. Would we consider doing that again? 'Cause we do need a logging industry.

Meet-105

But we probably wouldn't consider putting that stuff into the air. But here we are doing it. Exploratory drilling, while they were here just doing their practice stuff and just looking around for the mother lode. They were fined for water, air, soil, tree violations, noise. So they couldn't even do the initial process. You would think when someone would come in and want to open up something really big, they'd do something really good at first to like show how

Meet-105

capable they are. These guys screwed up even the exploratory drilling.

And then we go into local mine watch, Allison Ranch Road. I was the one that

Meet-106

reported all that toxic stuff running into the creek that enabled that project to be done on Allison Ranch Road. Water infrastructure, last night in Grass Valley,

Meet-107

a house had to be ventilated for several hours because of chlorine in the water because of a water faux pas that the city had by Memorial Park.

Our infrastructure is so antiquated and falling apart in this town, and we want to add more, more, more, more, more houses, more people, more traffic, more everything.

Meet-108

Go outside and look at the parking. And I just have a feeling that as the planning commission, this is a done deal 'cause I've watched this project for a long time with the previous owners too. And I watched NID put in infrastructure for it. I watched that development on Greenhorn go in, all the

stuff that's going to benefit the mine way before they even applied. And I watched the board of supervisors be literally giddy about this.

Meet-108

GREENO: Thank you, Matthew.

MACHADO: My name is Mark Machado [phonetic]. I'm currently residing in District 1 at 13640 Canterbury Dr., approximately 1 mile due east of the proposed Brunswick mine site on a welled 3-acre parcel with NID nowhere in sight. Professionally I'm a semi-retired general contractor and a licensed professional engineer in this state. I've lived here for 22 years now. While I feel the draft EIR is inadequate for a host of reasons, not including the sheer absurdity of reopening a very large hard rock mine a mere 2 miles from the town center of Grass Valley, a town that has 13,000 residents, let's, let's compare that to when the mine was reopened in 1919 by Aaron McBoyle [phonetic]. Back in those days, there were 5,000 people in

Meet-109

Meet-110

Grass Valley. Interestingly, when he closed the mine in 1957, there were 5,500 people in Grass Valley, an increase of 500 people, obviously not a big boon for the coal mine. The draft EIR does not address any of the adverse, potential adverse effects of the gold mine on those 13,000 residents who live and breathe and have businesses and count on tourism to support their cause.

Meet-110

My main concern relates to the inadequacy of the draft, is water. The initial dewatering is estimated at 2,500 gallons a minute for 160 days. Doing the math, that equates to over one-third of a billion gallons of total water. After the groundwater, seepage will require continuous pumping of approximately a thousand GPM per the draft. That's per minute. In a month, that's over 43 million gallons a month, every month for the next 80 years.

Meet-111

Now my well. I live about a 20-minute walk from the site of this massive dewatering. The thought that this

Meet-112

dewatering is going to have no effect on my well professionally is just hard to believe. The draft EIR needs to better explain, better model, which is computer speak for no proof what's going on. Thank you.

Meet-112

GREENO: Thank you, Mark.

DIETRICH: Reduce this down a little bit, I'm short. Good afternoon and thank you for taking the time to hear your constituents here in Nevada County. My name is Teresa Dietrich. I am the legislative affairs chair for the Nevada County Association of Realtors. We have five areas of concern regarding the draft EIR, first being water. Um, many people have been talking about water, and I certainly don't want to beat a dead horse. However, we're very concerned about uh, the fact that the water is going to be pumped out of the ground, which could cause subsidence. We didn't see any notations in the draft EIR addressing the potential for subsidence because of the water table being changed by

Meet-113

Meet-114

all the dewatering.

Um, we're very concerned about traffic, and um that doesn't seem to be um, sufficiently addressed in the draft EIR. Um, specifically there's so much current traffic congestion, and we're wondering how that's going to affect uh, public services, emergency services, and schools and school buses. Um, the habitat and contaminants, we're really wondering how the amount for the bond for restoration was determined, and is that truly adequate to return that site to a natural and healthy state in the future. That's a big concern. Um, it doesn't seem like um, it actually says what that state would be in the draft EIR.

Additionally we're concerned about noise. Um, it didn't seem like the draft EIR really covered sufficiently the noise levels created by 24 hours of operation and all the truck traffic. And then um the electric, the electricity situation, um it, it doesn't seem like the draft EIR is

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addressing the need to decrease utility usage in Nevada County based on the climate action plan. And we'd like to know if you guys could ask that to be updated.

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And in closing, I just like to say that housing and workforce supply are not topics addressed in this EIR, yet the Association of Realtors encourages the county to ensure that they are included under further study in the economic impact report. We will be submitting um, a letter with more details, and we just want to thank you for, for contacting us for, with the further information after this meeting. Thank you so much.

Meet-119

GREENO: Thank you, Teresa. All right, so we're at uh, we're at that point where we're going to uh, recess for lunch and bathroom and we will reconvene at 12:30.

[Short break]

GREENO: Okay, we will reconvene for the afternoon session at 12:32 if we can yeah, close that door, thanks Tyler. I'd

like to start out, I'll pause you just real quick please, thank you, um I'd like to start out by thanking everyone. Um the uh, the unique nature of uh, of the comments and everyone holding their comments to uh pertaining to the draft EIR, um that's really appreciated. And uh, and also the um quiet applause, it uh it's really kept the meeting on track, and, and we've gotten to hear from your team constituents, your constituent teams. Uh, so with that, we will, we'll press on.

GRIFFITH: My name is Gary Griffith [phonetic]. I've lived at 11010 Gold Hill Dr. for 23 years. I've worked as a teacher at Nevada City School of the Arts for 21 years. I'm currently on the board of Wolf Creek Community Alliance, and I've been the lead stream monitor for South Fork Wolf Creek for 18 years, the creek in question much of the time in this document. And our organization will be submitting detailed comments, but I just want to highlight a

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couple general points. The Wolf Creek headwaters in which this proposed project would take place is a crucial component of our watershed. We Wolf Creek Community Alliance are concerned that the DER is deficient in a number of ways. Two general comments. First, we're surprised that the cultural resources identified in the draft are all mining sites. Not a single pre-mining site is identified in spite of archaeological sites well known to the state park existing in the area of potential impacts as detailed in the draft and public maps showing the existence of Nisenan village sites on both the South Fork and Wolf Creek itself. The draft, that the draft simply records outreach to tribes without succeeding in actually consulting with them speaks more to the failure of the draft than to the absence of knowledge of important sites on the part of trial communities. The draft needs to adequately survey for archaeological and traditional

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sites and fully consult with local tribes.

Secondly, the environmental setting should be framed more accurately. The proposed project sits within areas with some of the highest biological diversity in the county. A network of undeveloped land provides heavily used wildlife corridors as mentioned by a previous speaker and rare refugia for significant species. Aquatic

Meet-122

resources continue to provide crucial ecological functions to the watershed downstream. Instead of being characterized primarily as disturbed industrial zones suitable only for further development, they more accurately should be seen as biological resources that though damaged by long history of mining, continue to be resilient and over time have shown remarkable ability to recover.

Meet-123

South Fork Wolf Creek is a perennial stream starting above Brunswick Road, not out of a metal culvert. The pond downstream is not a mere collector of storm water but a

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consequence of the natural hydrology of the valley and a productive biological resource. The wetland habitats at the Centennial site that the draft seeks to ignore are important hydrologically for the headwaters and contain species of special concern.

Meet-124

Further, as the proposed permit is for 80 years into the 22nd century, impacts should be fully analyzed for predicted change changes we'll see due to drought, wildfire, and climate change in those 80 years. Given the severity of that future, the criteria should be not just to minimize negative impacts, but to ensure the continued recovery and resilience of biological function--

FEMALE VOICE: Four minutes - -.

GREENO: Thank you Gary, thank you. The, the five-minute folks are all identified in advance, so if you if, if you think you want to have five minutes, we should probably know about it, should have known about it already.

Meet-125

STOUT: Okay, uh my name is Teri Stout [phonetic]. I live at 101 Bawden Ave., Grass Valley, and I have been a resident of Nevada County for uh, 46 years. Um, I'm a retired educator and uh with a BS in biology and a master's in renewable resources. So I'm following um, the opening for Wolf Creek Community Alliance that just happened.

Meet-126

Regarding biological resources, we see six areas where the impact should be changed from less than significant to significant. I'll address special status plant and wildlife species as well as riparian wetland and other sensitive habitats.

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Regarding the special status plant species, the draft does not adequately address potential impacts to Stebbins morning glory, chaparral sedge, finger rush, and Sierra brodiaea. The management plan fails to protect the endangered Pine Hill flannel bush. It's on the endangered species list for California. Botanical surveys do not take place during blooming

seasons and dismiss portable, probable I'm sorry, occurrence in spite of suitable habitat. The flannel bush management does not incorporate sufficient buffers, plans for treatment with prescribed burning, and to show that transplanting would be successful, does not address those at all.

Meet-127

Two, special status wildlife species, the draft does not consider impacts to monarch butterflies and showy milkweed, which are in really low numbers at this point and so important for us throughout the whole western side of the Rockies. Um, and both of them present, are present at the Centennial site, as you've heard about for the yellow-breasted chat and also the California spotted owl present close to the Brunswick site. It fails to adequately consider impacts to Foothill yellow-legged frogs and red-legged frogs, western pond turtles, Cooper's hawks, willow and olive-sided flycatchers, which you heard about this morning. Surveys are inadequate and

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mitigations for impacts to western pond turtles and raptors do not adequately protect breeding habitat.

Um and the third one I'm addressing, there'll be more uh to follow up then, the third area is riparian wetland and other sensitive habitats. The draft does not include the full length of South Fork Wolf Creek or the pond at Brunswick, at the Brunswick site for the aquatic or biological resources. It excludes impacts to wetlands as they currently exist at the Centennial site. It does not adequately address impacts downstream to South Fork Wolf Creek due to dewatering, including areas within the state park. Entire reaches of South Fork Wolf Creek are not studied for basic hydrology or biological resources. Benthic macroinvertebrates, BMIs okay, benthic macroinvertebrates, that's the, that's the food and…

Meet-130

GREENO: Yeah, thanks Teri. And, and uh public comment can be done in writing too

if you feel like you'd like to continue.

STOUT: Thank you.

CRAWFORD: My name is Josie Crawford [phonetic]. I live at 17627 Vintage Dr. in District 2. I'm the executive director of the Wolf Creek Community Alliance. I'm a biologist with a master's in biology, and I am an 18-year resident on Wolf Creek. Um, so uh addressing mitigation 4.4-4, the movement of native fish or wildlife. By not characterizing perennial reaches of South Fork Wolf Creek as being aquatic resources, the DEIR neglects to consider the movement of fish and other aquatic species within the full length of the stream. The level of impact should be changed to significant. Mitigation 4.4-6, cumulative impacts, the DEIR does not address the loss of forest or wildlife habitat or cumulative impacts due to chronic stress for species, air quality, noise, risk of system failure over time, wildfire, and climate change. The level of impact should be changed to cumulatively

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Meet-133

considerable.

Appendix C, reclamation plan 5.12, um the section removal and closure activities, very brief by the way, fails to address how Rise Gold will protect the community from heavy metal contamination once the mining company has ceased operations, which could happen in six months or 80 years. There's no plan and no way to mitigate for the

Meet-134

leaking effluent that inevitably leaks from underground tunnels into the creeks years after closure. When sulfides, which co-occur with gold, contact water and air, they form sulfuric acid, which leeches heavy metals from the rocks. Arsenic, manganese, iron, cadmium, and lead are the leading toxins. When the mines close, tunnels fill with water. Eventually the water and the

Meet-135

tunnels bust loose somewhere, we don't know where, we can't predict it, and begin draining into the creeks in difficult to predict places. Acid mine drainage is considered the most serious threat to

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streams. It doesn't matter how green the mining process. As long as the tunnels fill with water, they will leach toxic metals. The Idaho-Maryland Mine Empire Mine and North Star Mines operated for about a hundred years. Today, 68 years after the mines closed in Grass Valley, the community and the environment are still paying for what happens after those mines closed. There are brownfield sites all over the county from these hard rock mines. Magenta Drain, the Drew Tunnel, and Little Wolf Creek are three big examples of uh, how we have toxins in the soil and the water that are very, very expensive to clean up. The Idaho-Maryland Mine is currently draining water into Wolf Creek out of four sites on the Idaho-Maryland Road uh, with arsenic and manganese levels above acceptable range for recreational waters according to state standards. This mine will need, this water will need to be treated forever.

GREENO: Thanks, Josie.

Meet-136

KEAN: Uh good afternoon. I wrote good morning, but now it's afternoon. So uh thank you for this opportunity. Uh my name's Jonathan Kean [phonetic]. Um, my wife and I live in District 3 at 11741 Alta Vista Ave. Uh we also own two other properties in Grass Valley, and I also own a house in District 4 up near um, North Columbia. Uh, our place up there is on property adjacent to the now defunct Siscon gold mine. Uh, but I've lived and worked in Nevada County since 1970. I'm a licensed building contractor and owner of Kean Construction, in business for close to 50 years here. Um, I currently serve as president of the Wolf Creek Community Alliance.

Meet-137

So in getting ready to address you this morning about the DEIR and that you're uh, you are looking at and assessing its adequacy, um I looked at the staff report that you probably have before you. And a sentence jumped out at me. It's like on the,

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page two, and it's a sentence that's repeated in the DEIR also in the project description. And it's, when it's quoted, it says, "A new aboveground pipe would convey treated water from the water treatment plant along an existing dirt road to the planned discharge point at South Fork Wolf Creek." Well, um the reason that jumped out at me is that um, uh the pipe is an important pipe. It's the pipe that they're going to pump uh, put the water back into, into South Fork from, but it's not the pipe that I want to bring to your attention. It's the wording, existing dirt road, 'cause that is not a road, it's a path. Um, I know this area pretty well. Our organization has monitoring sites just upstream and downstream. For years before Rise bought the property, oh dear, I'm probably not going to have time, um uh lots of creek neighbors and creek lovers enjoyed walking and birdwatching on the trails in that area. Um, there are trillium, equisetum, and a

surprising orchid called rattlesnake plantain that are on this supposed dirt road. It's not a road. Um, at least that's what it was last time I was there, about three or four years ago, so I don't know if the applicant has since built a road there. Um, but if so, there would be permits available to see that construction. So why does the DEIR and your staff report call it an existing dirt road? Uh, whoever wrote those words apparently wanted it to sound like oh, no big deal, this area is already degraded, it's fine to just put a pipeline right there. It's a small detail, but it's indicative of many other passages in the DEIR that minimize or--so thank you very much.

Meet-137

GREENO: Thank you, Jonathan.

TUTTLE: Good afternoon. Dear planning committee and staff, my name is Anita Wall Tuttle [phonetic]. I live at 6 Rockwood Dr. in Grass Valley and was a business owner up in Nevada City for 28 years. I'm opposed to the reopening of the Idaho-Maryland Mine. I

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have reviewed articles in the local newspaper and have also checked those sections of the environmental impact report regarding special concerns of mine.

Meet-138

When I came to Grass Valley 33 years ago, it was quiet and peaceful but had the desire to change the image in order to attract tourists and draw as a destination for those wanting a restful place to enjoy all the arts. It has been quiet successful but now we face a problem. In perusing the immense EIR, I found very little addressing the problems of noise and vibration which Rise Gold has hailed as significant and unavoidable.

Meet-139

They project that there would be a substantial temporary or periodic increase in ambient noise levels in the project vicinity and offer no ideas for mitigation. In regard to vibration, they propose a ground vibration monitoring program that should be implemented and additional protective measures be available.

The EIR does require mitigation in order to ensure that the aforementioned impacts are reduced to a less than significant level. I'm hopeful that the Board of Supervisors will carefully question this portion of the EIR. Our concerts, plays, and other programs depend upon quiet observance for happy audiences. Portions of the EIR are directly contrary to the standard of review stated in County Policy 17.14, and Policy 17.24. Thank you very much.

Meet-139

GREENO: Thank you, Anita.

PULMAN: My name is Fred Pulman [phonetic]. I live at 55 Rockwood Drive in Grass Valley. The prospect that a stunningly large list of mitigations in the draft Environmental Impact Report extended over 80 years will be consistently resolved is naïve and disingenuous. Mitigation is defined as the diminution of anything painful, severe, afflictive, or calamitous. The DEIR for the proposed Idaho-Maryland

Meet-140

Mine identifies dozens of negative impacts that it claims can be mitigated. There are several that cannot, aesthetics, noise, and traffic, and section six, page seven, should be enough to prevent the project from moving forward.

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Among those that the report claims can be mitigated are the generation of pollution emissions that would exceed Northern Sierra Air Quality Management Districts applicable thresholds, potential seismic hazards at the Brunswick industrial site, potential elevated arsenic levels, a possible significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, possible negative impacts related to water quality, and impacts exacerbating wildfire hazards. All these impacts are referenced in section six, pages five through seven.

Meet-141

The many presentations today reveal that the DEIR's mitigations are extremely inadequate. Allowing a ponderous extraction

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within the--extraction industry within the city of Grass Valley invites a multitude of risk to the health, stability, and sustainability of our community. The risk

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to health and environment are numerous and include damage from toxic mining dust, diesel exhaust, and toxic residue such as mercury, cyanide, and lead in our downstream ecosystems.

Those living close to the mine will be forced to suffer the noise and congestion from 100 trips per day of trucks hauling

Meet-143

waste rock and incur well water depletion or perhaps even loss of their wells, wells. At their last meeting, the NID board members expressed their concerns of this becoming a bigger problem than the DER--DEIR presents.

As you deliberate on the DEIR's merits and shortcomings, please consider this as

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not just a Grass Valley matter but as a county matter. Our town--and I repeat, our town is a vital component of the county's financial wellbeing, one of its major hubs

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for the arts and culture, and a launchpad for people who come to explore the county's natural beauty. Help keep it so.

GREENO: Thank you, Fred.

Meet-145

PAPANUK: Good afternoon. My name is Catherine Papanuk [phonetic]. I'm a resident of--on Footwall Drive, Grandview Terrace, Grass Valley. I'm adjacent to Bennett Meadow. First, I am extremely impressed by the caliber of our comments today. I think we have a lot of really talented people here in Grass Valley. I am not a scientist, nor am I a lawyer. So we're here today to talk about whether a specific business, the gold mining business, as opposed to any other business, is in the best interest of the citizens of Nevada County.

Meet-146

This is a heavy industrial, hard rock mining business and we're talking about 80 years, 80 years of 24/7 mine operation. Your children will live their whole lives with this, and their children will still be

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enduring the torment of this mine, still listening to rumbling below their house or the thunder of trucks carrying waste rock down the street. They will breath the toxic dust, listen to the nonstop crushing mill, drive on destroyed roads, watch habitats disappear, and our natural beauty fade.

GREENO: Catherine?

PAPANUK: Yes.

GREENO: You're addressing the project. Today we're just talking about the draft ERI. Is--are you going--getting to that?

PAPANUK: Okay. These are my concerns. First of all was the sulfuric acid going into the groundwater. I'm concerned because we--these guys are proposing to have the excavated rocks stored in two gigantic 21-

Meet-147

acre and 37-acre flat-topped piles up to 70 feet high. That's a lot of sulfuric acid that that's going to generate. I don't know how you're going to control unless there's like a plastic liner under it or something. I don't see how that's going to be mitigated.

GREENO: We're just--but we're talking about the, the document today. The project will be reviewed later.

PAPANUK: Okay.

GREENO: And that would be the time for these comments.

PAPANUK: I don't see how there's going to be any mitigation to dumping 15 and a half valley--Grass Valley municipal swimming pools worth of water into South Fork of Wolf Creek. I don't believe it can handle that capacity. There's a lot of native grasses there that I don't think that the--as one other speaker said previously that wasn't included in the Environmental Impact Report of what's in Bennett Meadow and what's going to happen in Bennett Meadow.

Meet-148

I'm concerned about who is going to take care of us after Rise Gold disappears and the person that started Rise Gold or the next person. And given these and other environmental concerns, I don't know how it's possible that a heavy industrial mine

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is of greater benefit to Grass Valley, Nevada County, than any other type of business.

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I--we, the people, assume all the risks, while those with no interest in our quality of life leave with all of the gold. I hope that your commission can...

GREENO: Thank you, Catherine. Thank you for modifying your comments to address the EIR as well. I appreciate that.

BLAIR: Hello. My name is, excuse me, Maryanne Blair [phonetic] and I live at 12182 Sunset Avenue, Grass Valley. I believe that's District III. And thank you for your patience with all of us today. I really appreciate all the previous comments.

Meet-150

I bought my home in Grass Valley nine years ago and retired here less than a year ago. I moved away from the bustle of a large urban area to this lovely, peaceful community, to retire here. As a consumer, I spend my hard earned pension on property taxes, goods, and services in the area. I

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care deeply about this community and I vote.

In my 15-year career in a large water agency in Santa Clara County, I worked as biologist and engineering technician, a field operations administrator, and a vegetation specialist. Literally boots on the ground through heat and cold, flood and

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drought. I saw a lot of changes brought on by climate change to the creeks and the reservoirs during that time. My education in three degrees in science, including a master's degree in environmental studies, have taught me much, including how to analyze data and the conclusions drawn from them.

I will say flatly that the min--the analysis and the mitigation measures are not adequate in this DEIR. More specifically,

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when reading it, I was chagrinned by the subterfuge within it which is used to minimize impacts or flat-out deny them. For example, in lieu of mitigation for impacts on the Centennial site, there are frequent

references to remediation in the Department of Toxic Substances Report which other people have touched on which is not even published yet. The same goes for the economic impacts of the project. We are still waiting for that economic study which a conscious member of the Board of Supervisors requested.

Meet-152

I was also stunned by the convoluted logic used to justify the conclusions in the DEIR that many, many impacts are less than significant. They are not. In the face of climate change where air, water, and our very lives depend--are threatened even, even without this impactful project, there is no excuse for this.

Meet-153

Here are a few of the examples of the erroneous logic in this report. First by categorizing the first two years of the operation as construction and the following 78 years as operations, Rise Gold Corp would only have to purchase carbon offsets to mitigate for the carbon emissions for the

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first two years. After that, they wouldn't mitigate for any of the carbon dioxide they produce annually. Unacceptable.

What is really a slap in the face to us is that Rise Gold Corp's consultants think that this plan is acceptable, acceptable because the citizens of California have cut their carbon footprint since 2006, working hard to reduce carbon emissions and greenhouse gas in our communities. How dare they?

Meet-155

Meet-156

This DEIR mistakenly concludes that a few more decibels of noise in an area that is greater than what is currently tolerated seems acceptable with some mitigating measures. Decibels are measured in a log-- on a logarithmic scale, just like the Richter earthquake scale where on numeral higher on the scale is ten...

GREENO: Thanks, Maryanne. And, Maryanne, if you didn't finish, please submit in writing.

BLAIR: A lengthy one in writing.

GREENO: Okay.

BLAIR: Thank you.

Meet-157

CAPPA: Hello. My name is Paul Cappa [phonetic]. I reside in District III, at 12859 Bradford Drive, Grass Valley. I want to touch on a part in Chapter 3, page 33. And this would be the potable water line that's going to be ran to homes that may be compromised by the mine.

Meet-158

In the DEIR there is no mention of any backflow prevention devices that will be needed for every resident that accepts water from this pipeline to protect the water pipeline--potable water from being contaminated upstream of it. Within that, those devices will need to be tested, certified every year that they're working properly, maintenance, replaced, or whatever has to happen with them. And that should not go on the price tag of the homeowners accepting this water that they once didn't need before. And they also need to be protected from freezing, tree limbs falling

Meet-158

on them. So a cage would have to be built around all these devices.

Meet-159

Also, I don't understand why there's so much water that's going to be interjected back into Wolf Creek. The, the mine is going to be buying water from NID to use for toilet and sinks and showers. Why can't they use this treated water? Turn it back around and use it for their own facility. It makes no sense to me.

Meet-160

It should be in the acceptance plan. There were four different acceptance plan. They, they talked about the spoils of the rock and stuff coming out in different scenarios on what to do with that but nobody is talking about all this water. The water is the most precious thing there and nobody is talking about how to really conserve with the water.

Meet-161

I know a little bit about the plumbing and water usages. I'm a retired plumber. So that's why I chose to speak on this part where I feel like the DEIR report is

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insufficient with its report. It, it seems like there's a section in there on the water usage of what the mine needs to use. It is a little unclear. If they could go back to that and revise it, and make it a little bit clearer for the known amounts of water that they're going to need outside of the weather that they're dewatering from would be good to know because to me it's very vague. And before you know it they're using a whole heck of a lot of water. Thank you.

GREENO: Thank you, Paul.

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JOHNSON-VAUGHN: I'm Gail Johnson-Vaughn [phonetic], 11793 Lower Colfax Road, a 40-year resident of our county. I hold a doctoral degree in organizational psychology with a special interest in behavioral economics and the psychology of decision making.

Meet-163

You are tasked with an awesome responsibility to recommend to our Board of Supervisors whether this project sufficiently benefits our county to outweigh

the consequences of the negative impacts now and for the next four generations. You have been provided with a draft EIR that fails to give you adequate analysis you need to make that recommendation.

Psychologist Daniel Kahneman was awarded the Nobel Prize for economics for his work on the psychology of judgement and decision making. He tells us that intuition cannot be trusted in the absence of environmental regularity. At no time in our human history has there been a greater absence of environmental regularity than what we're experiencing now.

Meet-163

The draft EIR relies on intuition in a number of ways. It is a sort of intuition that concludes that assumptions of environmental impact based on historical data are sufficient to predict the full negative impact of this project as we sit at the 11th hour of life threatening climate change.

It is the kind of intuition that argues

that although Dr. Lu [phonetic], the draft EIR expert hydrologist states that it is not possible to create a predictive hydrology impact model that takes climate change into consideration, it is still acceptable to base the EIR analysis of well integrity and water quality for the next 80 years on historical data that assumes a cycle of a few dry years followed by many wet years.

Meet-163

It is the kind of intuition that argues that it is acceptable to assume that the consequences of a project are not--the air quality consequences are not significant even when added to our county's already failing air quality, as has been previously discussed. It is--that it is acceptable to allow these negative impacts to exacerbate the impacts of climate change, even that we are now experiencing the unprecedented ongoing drought and horrific smoke smothering wildfires.

Meet-164

It is this kind of intuition that permeates the draft. The science supporting

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an EIR is only as good as the accuracy of its assumptions. Based on the greatest-- perhaps the greatest inadequacy of this draft is basing the analysis on a single set of assumptions rather than the multiple set of assumptions which take into consideration the continuum of possible and...

GREENO: Thank you, Gail. And, Gail, can you tell me what number you were?

JOHNSON-VAUGHN: 40.

GREENO: 40? Thank you. And is this 41 by chance?

VAUGHN: I'm 41.

GREENO: Perfect.

VAUGHN: I'm actually older than that now.

[Laughter]

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VAUGHN: My name is John Vaughn [phonetic]. I've been a resident of Nevada County since 1967. My wife Gail and I live at 11793 Lower Colfax Road. Our well is approximately 100 yards from the southwest edge of the Rise Gold mineral rights area.

We are District III voters.

The last ten years of my career I was the senior vice president of manufacturing and logistics at a nonprofit in Roseville with responsibilities including a distribution contract for the world's largest printer manufacturer, shipping millions printer parts per year all over the world.

Meet-166

I have many concerns with the draft EIR and am submitting my written comments today. One that stands out is the lack of inclusion and review of a previously approved use for the Idaho-Maryland site, which is the Nevada County Business and Industrial Center. As already approved and zoned, this alternative could include 54,000 square feet of business park, 242,000 square feet for service business and light manufacturing, and 238,000 square feet for industrial uses.

Meet-167

The draft EIR wrongly concludes a negative impact and rejects this alternative, assuming the impact would be the same or

worse than the Rise Gold mine. Unlike Rise Gold, in virtually all cases in the real world for the types of businesses that would actually locate there, the traffic would be comprised largely of passenger cars and small trucks operating in the daytime, mostly weekdays, and not 24/7. Diesel truck traffic would be substantially less than the 236 trips per day for the Rise Gold project.

Meet-167

The scale and location of this site would not support large distribution facilities, auto dismantlers, or plaining mills, as claimed in the draft EIR.

Meet-168

My written comments include more specific details about why the draft EIR conclusions regarding the business and industrial center alternative are inadequate. To reject this alternative without a more detailed review using real world scenarios and real world outcomes makes no sense.

Meet-169

You've heard "makes no sense" a few times today. I believe an adequate review will find that the business and industrial

center is in fact the environmentally superior alternative. This is the wrong project for Nevada County. Thank you very much for the work you are doing and for your time today.

Meet-169

GREENO: Thank you, John.

LYND: Hi. Thank you for this opportunity to bring forward concerns. I appreciate that you're here and that you're hearing us. My name is Debbie Lynd [phonetic]. I reside at 642 Partridge Road in Grass Valley. I'm a 34 resident of this county. I raised my two children here. I have a bachelor's degree in business management.

Meet-170

I won't repeat what has already been said but most of the concerns that have been brought up I equally share. I would like to bring one up that was not emphasized enough either in comments today or in the report. It's an economic impact of property values. I have the largest investment in my life in my home, as do many of the people that have

Meet-171

spoken here this morning. We have a realtor next door to us that has said already he is being impacted because he's having to disclose the potential for this mine and it's causing people to turn away. So I am concerned of what's going to happen to the largest investment that I have made in this county. Thank you for your time.

Meet-171

GREENO: Debbie, thank you and I appreciate the unique change to your script there very much.

HECHT: Good afternoon. Thank you all very much for being here. My name is Ricky Hecht [phonetic]. I am a homeowner. I live at 13641 Greenhorn Road. I'm a thousand feet from the mineral--from the mine entrance and my home is exactly over the mineral rights area.

Meet-172

I appreciate all of the comments that I've heard today. I have a number of concerns but I'm going to--I'm going to consolidate them. I also happen to sit as a Nevada Irrigation District Board Member. So

Meet-172

the comments that were made earlier by our general manager, she had to condense. And I wanted to add a couple other things for the purposes of this hearing.

The NID Board of Directors expressed--I have to find this now--expressed serious concerns that the number of impacted wells could far exceed the 30 estimated by the draft EIR. NID proposed that the applicant

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conduct a more extensive and robust well and groundwater monitoring effort prior to and during any dewatering. Should the number of private wells impacted exceed the 30 that the applicant is estimating, NID believes the applicant should guarantee and include in its proposed mitigation for potable water for each well that is impacted.

The draft EIR also includes a

Meet-174

mitigation measure to pay for consumptive water use for the parcels along the East Bennett Road that connect to NID or that would eventually connect to NID. However, the applicant we believe at NID--and this is

in our letter, that the applicant should cover the cost of the consumptive use for each impacted well for a period of 24 months after the project is complete or abandoned. I believe they wanted to pay until the property was sold. This includes the initial mine dewatering as well as the continued mine operations.

Meet-174

And in order to establish a baseline of the number and quality of wells outside of the East Bennett area, NID suggests the applicant undertake advances sampling of both water quality and production for the wells located in the Wood Rose, Greenhorn, and Beaver Lane areas.

Now, let's see where am I on my thing. Oh, I'm so sorry. There's a couple other things I wanted to bring up very quickly. One is fire evacuation routes. Okay? In the traffic study that the applicant did, it is so inadequate that the fire evacuation routes were not even mentioned in the traffic study. This is a big deal.

Meet-175

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Greenhorn is--at Brunswick, that's a chokepoint. There's one way in and one way out. And that needs to be further sorted out in terms of the numbers of cars and employees that will be impacting that.

Meet-176

Lastly, I want to talk about collapsing tunnels. No one here has mentioned that.

GREENO: Thank you.

FLEMING: My name is Jan Fleming [phonetic]. I'm the President of Iron Horse Homeowners Association.

GREENO: Can you pull that down, Jenna?

FLEMING: Yes.

GREENO: Thank you.

FLEMING: My name is Jan Fleming.

GREENO: Or Jan, thanks.

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FLEMING: I am President of Iron Horse Homeowners Association. My address is 130 Iron Horse Place, in District III. And I am representing the owners from Iron Horse Place.

Meet-178

With our homes located approximately one mile from the mine, we are specifically

addressing air quality, noise, and the likely release of hazardous materials. With respect with air quality, greenhouse gas emissions, and energy, the mitigation measures for construction do not include a specific time period. This could go on for many, many years. The construction stage should include a specific time period and substantial penalties for noncompliance.

Meet-178

Due to the complexity of the emissions standards and types of equipment allowed, the DEIR should include onsite monitoring by a representative of Nevada County to ensure compliance. All the specific mitigation items under hazards and hazardous materials include reports that must be submitted to Nevada County Planning Department prior to underground storage, transportation, or use of hazardous materials or explosives on site.

Meet-179

The mitigation measures should state that the mine shall be responsible for providing sufficient funds to Nevada County for review, approval, and oversight of all

Meet-179

of these activities.

The project will generate a substantial permanent increase in noise levels in the vicinity. If noise standards are exceeded, operation should cease immediately until

Meet-180

additional engineering controls can be implemented. Additionally, there should be specific, substantial, clearly defined financial penalties if standards are exceeded.

The DEIR should include an annual review of the project to ensure that

Meet-181

mitigation measures are in compliance with the most current environmental greenhouse gas and air quality regulations.

Additionally, rather than an 80 year agreement, there should be a full review in five year increments. Providing individuals

Meet-182

living near the mine to have some respite from the constant noise and vibration is important for both physical and mental health. We recommend that hours of operation be limited to eight--to 7--to 7

Meet-182

a.m. to 9 p.m. Thank you.

GREENO: Thank you, Jan.

FROMM: Hello. My name is Peter Fromm [phonetic]. I live at 14006 Liquidambar Lane, about a half a mile from the Brunswick site. So I'm really concerned. And I know a lot of people have talked about water and I'm going to continue that theme a little bit here because, according to recent

Meet-183

studies, the current megadrought is the worst it's been in 1,200 years. I'll let that sink in, 1,200 years.

It should be obviously but during a drought water levels in lakes, streams, reservoirs, and aquifers goes down. In addition, our friends at Rise Gold intend to remove water from the tunnels to the tune of millions of gallons per day. Show of hands. Who thinks this is a good idea?

GREENO: If, if you could keep it to the EIR specifically?

Meet-184

FROMM: The DEIR states because the rate of groundwater discharge and the rate

of groundwater recharge are generally within the same range, the groundwater in storage within the bedrock fractures is in balance and there should be no long term trends of increasing or decreasing groundwater levels outside of normal seasonal fluctuations. No increase or decrease, I don't think so.

When that water is pumped out, more water will backfill to replace it. And the source of that backfill will be the aquifers which feed our local wells. Rise Gold has offered to connect 30 properties to the NID system.

Meet-184

DIR--DEIR states if it is determining that mining operations are resulting in a significant impact to any wells, the project applicant shall be responsible for providing a comparable supply of water to such homes or business whose wells are significantly impacted and, if necessary, providing an immediate water supply.

I am betting that their idea of "immediate" and mine are somewhat different.

Meet-184

And while we're waiting for that immediate time period to pass, what do we do in the meantime? A lot of us are seniors on fixed income and cannot afford the alternative. I checked with NID to determine the costs and timeframe required to connect to their system. As it turns out, the cost is really high. In my case, approximately $150,000. And because of the multiple easements and right of ways required, the timeframe will be many months, if not years.

Meet-185

So all the affected homeowners are asked to subsidize Mr. Mossman [phonetic] and his environmentally destructive operation. And even though he's making the claim of a bunch of high paying local jobs, a suspect claim at best, guess who is really paying for them? That's right. It's us.

So if I'm being forced to pay for this folly, do I get a piece of the action? Don't answer. Thank you.

Meet-186

MERTZ: Good afternoon, Commissioners. My name is Kako Mertz [phonetic] and I'm a

resident of District I. However, today I'm here to speak on behalf of the South Yuba River Citizen's League, affectionately known as SYRCL. I'm also here to speak on behalf of our network of 3,500 volunteers and members.

Meet-186 SYRCL has been formally opposed to the mine since 2021, due to negative impact this project will have on our community and the environment. We're a community based organization focused on protecting and restoring the Yuba Watershed. We will submit written comments, so today I'll highlight just a few major flaws.

First, looking at the biological resources, the DEIR concludes many special status plants and wildlife are unlikely to occur in the project area but in many cases **Meet-187** uses outdated or flawed information such as surveys from the 70's or surveys that occurred outside of seasons where a special status species may be present or identifiable. It's unscientific and

unreasonable to conclude that a species has low likeliness to occur if underlying data is flawed. Many other conclusions were made without any site specific data at all.

Meet-187

Hydrology and water quality is another poorly analyzed resource in the DEIR. The hydrologic analysis only considers existing conditions but doesn't consider the planned additions of impermeable materials such as parking lots and buildings, which means water would move faster through developed areas of the project site and have less opportunity to be absorbed into the soil. For an accurate understanding of project effects on hydrology, these changes should be accounted for.

Meet-188

Additionally, historic precipitation rates were used that didn't account for climate change. The science tells us that our local hydrology in the Sierra Nevada's will change from snow dominated to rain dominated. Modeling efforts need to account for extreme variability, especially

Meet-189

Meet-189

considering the 80-year lifetime of this project.

Lastly, the water supply assessment is deeply flawed. First, the claim that Rise Gold would be a net water producer is false and misleading, and ignores the body of science that proves groundwater and service water are fundamentally linked. Together, these sources of water constitute the water bank for our community. With a large number

Meet-190

of well owners per capita and continued drought in the county, mining activities are likely to have a major impact on water security in the region.

The assessment claims, without reasonable evidence, that operations would only impact 31 wells, while past analysis to reopen the mine estimated an order of magnitude more wells with an even smaller project.

Meet-191

Given these issues and numerous others, SYRCL asks that the Commissioners require more information where there are

Meet-191

deficiencies and reject any conclusions in the DEIR that are not clearly linked to the best available science and data. To protect our precious community, the environment, and the culture of Nevada County, please ensure all due diligence is done to understand the full extent of all potential environmental impacts. Thank you for your time today.

GREENO: Thank you.

Meet-192

KIRSTIN: Hello. My name is Suzie Kirstin [phonetic] and I work for REMAX Gold. I am a realtor. I live at 13233 Lost Lake Road in Grass Valley. And I have several concerns with the EIR. I'm going to mention a couple here and then I'll elaborate on those.

Meet-193

But, first of all, what's--it seems like it was grossly understated in terms of the environmental impact. And I'm going to give you an example. So, for example, in the EIR it does not identify Idaho-Maryland as a superfund site. And even though it's not an open superfund site, once you have a

Meet-193

superfund site status from the federal government, you're always going to be a superfund site. What happens is the DTSC comes out and does testing. And if for some reason you happen to be clean, then you can get rid of that status.

But we were in the process, the DTSC was in the process of testing the Idaho-Maryland superfund status when, you know, Rise Gold came out. And they decided to stop their process, thinking that Rise Gold would be working with--they went under some protection program to continue checking into its superfund status.

So my comments today--and I don't know if people realize this. We have a lot of superfund sites in our community today. And they're all residual effects from having tailings and water.

And once you have that superfund status, you have to disclose that for the life of the property. I've sold superfund sites before. It's not pleasant for the people

that live there. They don't get their full complement of, you know, price that they think. We have a lot of people in our community that this is their only nest egg. Their house is their only nest egg.

Meet-193

And so now, on top of that, you're going to be throwing--which I didn't even know it was 80 years until I got here today. That is unfathomable to me that we would consider doing 80 years of gold mining. But just the fact that you're moving to a place where they're going to mine for 80 years, your property value is going to go straight down. People are not going to put up with that because, A, it takes away from your life. Right? Your life expectancy when you look that up online, you're going to die sooner.

Meet-194

And, by the way, arsenic, when the gold mine opens, arsenic is in those parent rocks that they're going to crush to get that gold. And so when arsenic is--gets so refined, it's like asbestos. It's in the air. It's

Meet-195

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in the water. It travels everywhere. You can't control it.

So what's interesting to me is that we're going to open a super--a known superfund site from the federal government and we're going to suck water in from all the water in the community...

GREENO: Thanks, Suzie.

ERWIN: Hello.

GREENO: Hi.

ERWIN: I'm--

GREENO: [Interposing] Addressing the, uh, EIR?

ERWIN: Yes.

GREENO: Okay.

ERWIN: Absolutely.

GREENO: Thank you.

[Laughter]

Meet-196

ERWIN: I'm Jeff Erwin [phonetic]. I live at 10407 South Ponderosa Way, Rough and Ready. Yeah. The, the DEIR obviously based on all the testimony I've heard today--I've learned so much today--is completely

fraudulent, I feel. At the very least it's a gross underestimation of the impact that this mine would bring to our community, not only our property values but also the health risks. I mean if any health risks would be acceptable, which they're not, you know, the DEIR does not adequately express those.

Meet-196

And the main thing for me is that it doesn't address the impact on the planet and on humanity as a whole. And so I've written a song that addresses that aspect of how it doesn't work. Here is a portion.

You might say your--you might say your mining claim is what everybody needs. Beneath your lying promises is a heart of your greed. We won't let you slip it into the ground beneath our feet, rape our land of treasures that our people sorely need.

Meet-197

Well runs dry and people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake.

Would you please do us the decency of

not pretending like you care when you fill our space with toxic waste and contaminate our air? Rivers have no memory of poison in their veins. We will fight for every drop till you abandon all your claims.

Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake.

Meet-197

It's time to put the planet back to the place where it belongs. Sacred righteous architect of each and every song. Take dominion exploitation and greed without remorse. Bring harmony and dignity and honoring our songs.

Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Wells

Meet-197

run dry and the people are thirsty. Wells run dry and the people awake. Wells run dry and the people are thirsty. Wells run dry and the people awake. Thank you.

[Applause]

GREENO: Thank you, Jeff.

Meet-198

JOHNSON: Good afternoon, folks. Mark Johnson [phonetic], Orion Way, Grass Valley. I am a certified HAZMAT competent person supervisor for the United States Federal Government. I'm also a retired plumber.

Meet-199

Serpentine is the state rock of California. This mine that is--where you are standing, where you are sitting right now is embedded with serpentine. It is the state rock. You crush serpentine, which is a form of asbestos. You crush this and you create dust clouds of asbestos, mesothelioma. There has been 30 billion dollars attributed for to mitigate patients of mesothelioma. How much will Rise Gold donate to this 30 billion dollar fund to mitigate mesothelioma? Zero for I see.

Meet-200

Hydrology report is flawed. It is nonexistent. This is the same hydrology report that they gave to the Siskon Mine which drained multiple wells and still did tremendous amount of damage because hydrology is not a science. It's guessing. It's assumptions. It's maybe this happens over here, this happens over there. Who knows? No hydrology report is adequate.

Meet-201

Transportation issues, new signals. Are you going to approve a place where more people are impeded in daily transit because of one industry?

Meet-202

The hauling of ammonia nitrate which is the same explosive that was used to bring down the Oklahoma city building years ago in a much smaller amount will be hauled on our roads way too often. One accident will destroy the whole entire community. Look what happened in Brazil just last month. Ammonia nitrate truck went up, hundreds of deaths, one accident.

Meet-203

Reduced extraction, are we supposed to-

-if we do not allow this to go over 80 years, are we supposed to go for 139 years? That's six generations. I don't think you can form a permit that will cover six generations.

Meet-203

The scouring of Wolf Creek, I'm also a member of Trout Unlimited. There go all my invertebrates. There go my hellgrammites. There go my, my mayfly nips. There go my trout. There goes everything along the creek. Millions of gallons that will scour Wolf Creek every year. And, again, asbestos, asbestos, asbestos, mesothelioma. Get used to that word because you will breath it. You will be breathing in the same thing that causes mesothelioma. Thank you very much for your time.

Meet-204

Meet-205

GREENO: Thank you, Mark.

TAR: Good afternoon, Commissioners. My name is Erin Tar [phonetic]. I'm the Executive Director of the Bear Yuba Land Trust. We're a local nonprofit whose mission is to protect and defend the natural and working lands of the Bear and Yuba River

Meet-206

Meet-206

Watersheds. We do this through purchasing land in fee title, and working with private landowners on conservation easements.

For our conservation easement properties, we are legally bound to protect the conservation values defined in our easements which are recorded on title with the property. So why are we concerned about this project?

We hold a seven and a half acre conservation easement on the Bennett Street Grasslands and South Wolf Creek, which is located approximately two miles downstream from the Idaho-Maryland Mine location.

GREENO: Erin, is this going to be just about the project or about the EIR?

TAR: The DEIR.

GREENO: Okay, thank you.

TAR: Yeah. The conversation easement is owned in fee title by state parks is part of the Empire Mine State Park. And it's also home to Gold Country Avian Studies - - Indian Station where research has been

conducted on resident and migratory birds for the past six years. The conversation easement contains documented occurrences of endangered and threatened bird species, and unique seasonal wetland habitats that the conservation easement and the land trust is entrusted to protect.

Meet-206

In reviewing the draft DE--or the draft EIR, we found several deficiencies in the analysis. The current environmental review of the proposed Idaho-Maryland Mine project puts our ability to accomplish our mission and protect the conservation values of Bennet Street Grasslands easement in legal jeopardy.

Meet-207

In reviewing the draft EIR, we noted that the document does not include an evaluation of impacts on documented protected wildlife species or sensitive natural communities downstream of the project, including our conservation, conservation easement, which will be directly impacted through changes in water

Meet-208

Meet-208

flows and changes in water chemistry of South Wolf Creek.

Meet-209

We have a number of requests related to the updates to the DEIR that Kate Gazo [phonetic] will cover next and that our included in our comment letter which we will be submitting next week. Thank you.

GREENO: Thank you, Erin.

Meet-210

GAZO: Good afternoon. My name is Kate Gazo. I'm the stewardship manager for Bear Yuba Land Trust. My professional background includes aquatic and biological impact surveys, natural resource mitigation, and conservation planning.

Meet-211

As Erin mentioned, Bear Yuba Land Trust holds a conservation easement on Bennett Street Grassland which is located two miles downstream from the Brunswick Mine location. The determination of less than significant impacts presented in the summary of impacts table for protected species and sensitive natural communities is unfounded and needs to be reexamined. The geographic area for

reviewing natural resources impacts is too narrow and needs to include impacts to natural communities and wildlife downstream of the project area.

Meet-211

We are specifically concerned about how increased water flows in South Fork Wolf Creek and changes in the water chemistry will affect communities and wildlife. More or less water in a system, particularly if the water has increased turbidity and/or heavy metals, influences what vegetation communities can exist and therefore what wildlife uses or doesn't use the area.

Meet-212

There is no surface water quality data disclosed in the report, even though it is reference in the South Fork Wolf Creek technical memo. Therefore, changes in water quality, surface water quality once the mine begins operations will be unknown because there is no background concentrations to compare to.

Meet-213

Another large flaw in the report that we noted is that it omits discussing impact

Meet-214

Meet-214

on multiple California Endangered Species Act listed species that have documented observations within the Bennett Street conservation easement, again two miles downstream from the Brunswick Mine location.

As Allison Nelson [phonetic] previously mentioned prior in the meeting, an endangered bird, the Willow Flycatcher, and several other protected state birds were observed within the easement. These were not discussed in the report or disclosed, disclosed.

The easement also contains suitable habitat for the state listed as threatened Foothill Yellow Legged Frog, and we have also observed bear, deer, mountain lion, and numerous other wildlife species using South Fork Wolf Creek.

Impacts to protected species and sensitive vegetation communities such as the unique seasonal wetland within our, our easement are not adequately assessed in the DEIR. And therefore the less than

Meet-214

significant impact determination is unfounded.

We request for the biological assessment to be revised to assess impacts to Endangered Species Act listed species such as Willow Flycatcher and Foothill Yellow-Legged Frog, and to include analysis on downstream wildlife and sensitive natural communities, and not just the two mine locations, and for baseline surface water quality sampling data including heavy metals to be included and disclosed to the public. Thank you for your time.

GREENO: Thank you, Kate.

Meet-215

DEVINE: My name is--my name is Judy Devine [phonetic] and I live at 12--12900, uh, State Highway 78--174. And I am concerned with increased traffic in that--in that area and affecting the children. I live near a daycare. They have to breath this--these pollutants in the air. I'm also--the neighbors walk very regularly in that area. They will have to be breathing

this air. They will have to be listening to the loud noise, the vibrations in the ground. They're already having problems with vibrations whenever the trucks are going past, the big trucks.

Meet-215

So I think, you know, if any of you were living in that area, you would not be voting for this because it would be affecting your property value, your air quality, and of all things you might just have a life that you wished you hadn't.

GREENO: Thank you, Judy. And just a reminder, we are not taking action today and the action will be taken further on down the road. And then it will be a recommendation. It won't be a vote as much as a recommendation.

Meet-216

WHITEHEAD: Good afternoon, Mr. Chairman and Planning Commission and staff. I am David Whitehead [phonetic]. I live in District III at 100 Bawden Avenue in Grass Valley. I'm a registered civil engineer with a 28-year career in public service. I

want to thank the Planning Commission and county staff for our work on the Rise Gold project. You are fulfilling your duty to inform the public about the details and impacts of this project.

During my career, I worked on hundreds of public works projects. Every one of those projects required an Environmental Impact Report--an environmental document in compliance with CEQA. I know how challenging your job is, especially under the scrutiny of so much public involvement. Thank you for your skill, your knowledge, your experience, and the balanced--balanced judgment you bring to our community.

Meet-216

The greenhouse gas section of the DEIR is inadequate. I've submitted a more detailed commentary letter but I just want to point out a couple of things I noticed as a read the greenhouse gas section of the DEIR. I reviewed the GHG section of the DEIR because I believe that climate change is one of our societies most pressing

Meet-217

challenges. That is why I helped form the Nevada County Chapter of Citizens Climate Lobby and Education. CCL interactions with local citizens and elected officials, helping bring awareness about climate change to our community, the State of California, and the USA.

So first I would call your attention to the executive summary of the DEIR, specifically the statement that Rise shall retire carbon offsets equaling 2,664 metric tons of CO2 equivalent, which is found on page 223. This number is curious because it does not agree with the calculated figures presented later in the analysis section of the DEIR. There, the figure presented is 2,344 metric tons, a difference of about 320 metric tons.

It's not clear what accounts for this discrepancy but I would like to note that the estimated values and the tables in the analysis section of Chapter 4.3 are presented as having a high degree of

Meet-217

Meet-217

precision, to six significant digits. This level of hyper accuracy is probably not appropriate for calculation of estimated quantifies of GHG emissions given the underlying quality of data.

Second, I would call your attention to the actual calculations of GHG emissions presented in the DEIR and one of the proposed mitigation measures. If you look at the tables of calculated values, you see a focus on annual GHG emission production.

Meet-218

What is not included is a calculation of the total GHG emissions produced over the 81-year life of the project. So I ran the numbers using only the numbers provided by Rise Gold. The project is estimated to produce over 700,000 metric tons of CO2E.

As far as mitigation goes, Rise Gold proposes to purchase and retire carbon offsets in the amount of 2,444 metric tons. They propose not to mitigate 700,000 metric tons. Therefore, Rise Gold proposes to mitigate just .35% of the total GHG's

produced by their project.

A reader of the DEIR who is knowledgeable of climate change and threats of catastrophic impacts on life on earth might conclude that such a proposal is not in agreement with these challenges and our growing knowledge of climate change impacts that we face today.

Meet-219

GREENO: Thanks, David.

WHITEHEAD: Thank you.

GREENO: Thank you.

NEFF: Good afternoon the good people of Nevada County and our representatives who sit before us here today. My name is Forest Neff [phonetic] and I first became a resident of Nevada County in 2007. I currently reside in District I at 13220 Cement Hill Road.

My concerns with the draft EIR pertain mainly to the inadequacy of the methodology used to assess the potential impacts on air and water quality. Those inadequacies include an unrealistic geographic and

Meet-220

temporal scope of the impacts and a failure to properly address existing impacts from previous mining in the area that may be exacerbated.

Meet-220

Given that these issues have been discussed at length by our community members here today, I would like to focus on this Board's consideration of that questionable report. I would like to remind the Board that while it is your duty and obligation to consider the expert evidence and reports brought before you, including this draft EIR and the concerns of environmental groups and community experts, that obligation is secondary to your sworn duty to represent we, the people, your constituents whom you see before you today.

Meet-221

Over 400 community members have come today to express their oppose to this project. I ask that you recognize that overwhelming consensus of dissent in your constituency as you proceed in the review and consideration of this project at large.

Meet-221

Thank you.

Given that I have a few minutes remaining, I would also like to speak on behalf of Gold Vibe Kombuchary, a local multimillion dollar business in the Loma Rica District less than a mile from the proposed site who depends on quality air for the production of their product. They would need to probably implement massive cleaning systems that I doubt Rise is planning on paying for to be able to produce their product at the quality that it's currently being made once the air quality does go down.

There are other issues, of course including the noise and water quality, yada-yada-yada. You've heard plenty about all of that. They may be sending a representative by later but I would like to mention that on their behalf as well. Thank you.

GREENO: Thank you, Forest. And the-- I'll take this moment just to make a note on something Forest said on the project. The, the Planning Commission is really the

judiciary branch of, of the county. The supervisors vote on behalf of the--of the constituency. It's our job to focus on whether or not it's legal if things are representative and, and correct. So just to--it's kind of splitting hairs but just so that we understand the executive, legislative, judicial kind of piece of this. Thank you.

MURPHY: Good afternoon. My name is Maryanne Murphy [phonetic]. I am a real estate broker and lawyer from Nevada City. I live at 13268 Woodstock Drive, Nevada City.

The application at issue is an 80-year plan to mine gold within claimed mineral boundary rights. The DEIR does not address what happens to the properties within the mineral rights boundary and to the impact to quality of air, water, and land, and noise, and as a fire hazard to those properties if Rise Gold mines them. And an 80-year permit would tend to indicate that would be the intent.

Meet-222

Meet-222

Instead, the DEIR refers generally to no divided neighborhoods. I submit that if an 80-year plan works out, there will be divided neighborhoods and displaced neighborhoods. And you will not see the same Brunswick basin surrounding us all in an area where gold mining left in the mid-twentieth century, in an area where we have developed to residential and commercial enterprise, and doing it successfully.

Meet-223

So the picture would be to examine the effects from mining under the developed and existing commercial and residential properties which may even include the airport and Dignity Health. As to the fire specifically, the DEIR seems to say that there is no very, very high fire risk. It seems to have a different mindset on what it means to be blasting every day for 24/7 or the opportunity to blast under people's homes for that 24/7. And what risk that might be to an incoming fire.

Take, for example, the Colfax fire that

advanced on 174. I wonder what the DEIR would say if they assumed that that fire would have hit the, the mine fully operational with all of the combustible stuff that it will have to be an ongoing concern. What different steps would need to be taken to mitigate that risk, to mitigate the devastation of that risk potentially to all the communities and the evacuation routes?

Meet-223

Thank you for your time. I really hope that you give a good, thorough review of all of the facts. It is very remiss as to what the DEIR has done. Thank you again.

GREENO: Thank you.

NELSON: Okay. Good afternoon, Planning Commission. My name is Megan Nelson [phonetic]. I'm a business owner, a home owner, and a voter living on East Broad, Nevada City.

Meet-224

The first thing--sorry, the first thing I'd like to request about the DEIR is that there is another one. We're by no means

Meet-225

ready to go to a final impact--Environmental Impact Review with the amount of shortcomings in this one.

Meet-225

One of the things that I think really should be included is a noise analysis at the property boundaries. That is per the county ordinance. So for them to say they're not going to do that doesn't follow your guys' own ordinance already.

Meet-226

I'd also like to see some additional exploration into the fire risk with the quantity of explosives being hauled biweekly and some statistical car crash information in conjunction with that. Not only how it could potentially be a huge fire hazard but the proximity of residences to the Highway 174.

Meet-227

I think we also really need to see a lot more research about seismic effects and potential tunnel collapses particularly under the airport, which is where we launch all of our aviation, basically, for fire suppression.

Meet-228

Meet-229

Let's see. Also, mineral rights and how they apply under the 27,000 acres or 900 private parcels in relation to soil depth and what those vibrations are going to do to people's homes, foundations, and the structural calculations.

Meet-230

Let's see. Okay. So 4.8-2C, which is apparently adopted by the BOS already, predicts--addresses the prediction at 10% well reduction and it talks about mitigation for that based on the 10%. So it's not considered dangerous. That's only taking the mining project into consideration. It's not taking the continued drought conditions over the next 80 years which could potentially put it in the 20% dangerous zone for homeowners and their well.

Meet-231

Additionally, downstream has not really been addressed, not only Wolf Creek but the Bear River, the Sacramento Delta, and the Bay. And when we look at cultural resources in relation to the theme of floodplain, down that channel there are a lot of holes that

Meet-231

have not been addressed.

Sorry. Thank you, guys, for hearing us.

GREENO: Thank you, Megan. Hey, Megan, what number were you?

NELSON: 75.

GREENO: 75, thank you.

NICKELS: So I'm 88. Is there anybody before me?

GREENO: Let's go 88. You're ready.

LAWRENCE: I'm 81.

NICKELS: Go ahead.

GREENO: All right.

NICKELS: Or do you want me to go?

GREENO: Yeah. Well, you're ready. Go for it. And we'll get 81 up there in the group.

Meet-232

NICKELS: Thank you. Hi, my name is Robin Nickels [phonetic] and I live at 19525 Copper Road in Nevada City. I grew up here and after spending seven years at college I came back because I've traveled around the world and around the country, and haven't found a place I'd rather live. And I think

that a lot of us agree but I don't think that will be the case if you--if the county decides to go forward with opening of the mine.

Meet-232

A major flaw I see in the DEIR is the fact that the baseline against which the environmental, social, and economic impacts are to be measured is proposed to be a future date after Rise Gold has started work on the Centennial cleanup site. This essentially allows Rise Gold to establish their own baseline and write their own litmus test by modifying the site prior to beginning mining operations as they have already begun to do. They have already denuded the area of one the proposed dumpsites and it looks like a moonscape. What more will they do before establishing their baseline?

Meet-233

The DEIR proposed cleanup of the Centennial site to a level of exposure acceptable for industrial and commercial use but not residential use. I wonder why

Meet-234

anyone would consider it to be acceptable for the workforce to be exposed to harmless levels of contamination eight to ten hours a day. Most people spend more cumulative hours at their workplace than at home. This standard would also forever exclude the possibility of residential use of the site without taxpayers having to clean up the mess left by the mine.

Meet-234

We are already having to clean up the messes left by the mines from a hundred years ago. And what about the neighborhood surrounding the site? Polluted water, air, and soil runoff won't stop at property lines.

The DEIR proposes to mix the toxic chemicals with Portland cement to prevent water quality impacts. Binding toxic chemicals and tailings in cement only offers temporary containment. Cement leeches and degrades with exposure to water and caustic chemicals. Any building inspector or active realtor knows that minerals in cement will leech out of the cement with water intrusion,

Meet-235

evidenced by the white dust in high water marks on building foundations. Cement septic tanks have an expected life expectancy of only 25 years. And if exposed to chemicals used in chemotherapy, for example, they can degrade to the point of failing within a couple of years.

Meet-235

Per the DEIR, Rise Gold will not be held responsible for the completion of the cleanup of the Centennial site. They will, however, be allowed to add tailings to the toxic waste site to 50 feet high. The DEIR fails to identify who or what entity will be responsible for cleaning up the toxic mess remaining after 80 years of production.

Meet-236

Item 1.4 allows for the cleanup of the contamination of the Centennial site to be completed after the end of the lease with the Idaho-Maryland Mine project. The DEIR also seems to allow Rise Gold to sell the property prior to completion of cleanup. Again, this absolves Rise Gold from the responsibility of cleaning up the toxic

Meet-237

waste mess it creates.

Meet-237

The report states that the traffic problems...

GREENO: Thank you, Robin.

LAWRENCE: Afternoon, members of the Nevada County Planning Commission. My name is Bill Lawrence and I live at 10201 Ridgeview Drive, which is just outside of the city limits. My career--well, I've lived here for 11 years. My career has been in public environmental health. I've worked internationally, almost ten years in Africa, 23 years Seattle King County Public Health where I was the section manager for environmental hazards. And I was director of environmental health here from September of 2013 to April 2014.

Meet-238

I come before you today with some severe reservations about issuing this permit. I trust that you've read the draft report and I trust that you've also taken good note of all the presentations that have come before me and will come after me.

I'd like to present about five or six arguments against the permit. The first one may not be in the draft EIR but I would suggest that we contact the CEO of Rise Gold as this individual once headed up a company in British Columbia. This company was called Banks Island Gold and as I understand it there are some serious issues up there. Find out what went wrong. Find out why there's still continuing litigation going on in British Columbia. Would you want to entrust this large project with an individual who heads a junior mining company?

Meet-239

GREENO: Bill, I got to--I got to hold you up there. We're, we're getting off onto something other than what we're here for today.

LAWRENCE: Okay, thank you. Number two, this mine is located on the very edge of the city of Grass Valley. Trucks will be hauling fuel, chemicals, explosives routinely to this mine. There was recently

Meet-240

Meet-240

a horrific mining accident in West Africa, in the country of Ghana. A motorcycle collided with a truck carrying ammonium nitrate. There was an explosion. Several people died and several buildings were demolished. Could this happen in Grass Valley? Why not? We have tons of motorcycles.

[Laughter]

Meet-241

LAWRENCE: Number three, Rise Gold claims with pride they will not be using mercury or cyanide. However, they will be using many other chemicals, some of which are flammable, some of which are toxic, and some of which have the properties to bioaccumulate in the environment. There is no real precision in the draft EIR...

GREENO: Thank you, sir. So let's see. Bill was 81 and what number are you?

SNODGRASS: You want to know my number?

GREENO: Yeah. Do you know it?

SNODGRASS: Social security or PIN?

GREENO: Did you get one or are you

without? It's fine if you're--if you don't have one.

SNODGRASS: Yes. I have the magical number of 101.

GREENO: Okay. Wow, all right.

SNODGRASS: Okay. Good afternoon. I'm Randall Snodgrass [phonetic]. I live in District I. I see this as a theater, a judicial theater. As you said, your job is in the judicial. I see that I am a public defender. Today I see the case being the People of Nevada County versus Rise Gold Draft Environmental Impact Report. I have one simple piece of evidence to offer for you today. It's this poster.

Meet-242

I want everyone to see this. This is a--this is sign that's mounted in Memorial Park, right in Grass Valley, right next to the children's playground. There's fencing on both sides that permit--that keep access away. I'll read you what it says.

"Warning, Aviso de Peligro, stream water may be hazardous. Avoid contact with

the water. Do not wade. Do not drink. Do not eat fish from this stream. Do not handle sediment. This stream drains through the Empire Mine, California's largest gold mining operation for over 100 years. The water and sediment contain residual metals and chemicals that may be hazardous. The State of California is working to clean up this stream but at this time please avoid contact with water."

Meet-242

We have a toxic stream in Grass Valley. Okay? 66 years after the closing of the Empire Mine, 66 years. So I am addressing the draft Environmental Impact Report. I don't think it adequately supplies information, strength of mitigations that would guarantee the health and safety of the people of Nevada County. That's my case.

And I think that you, as the judicial officers, will be making a verdict. You'll decide and you'll send your verdict to the judge, the judge being Nevada County. You have an auspicious responsibility as we all

Meet-242

Meet-243

do. This is not an indictment that I speak against Mr. Mossman. This is an indictment against the draft Environmental Impact Report.

So the strength of the mitigations is questionable. The actual insurance of can these mitigations be guaranteed can be equipped by sizable requirements of cash bonds out front to cover these possible damages. Thank you.

GREENO: Thank you, Randall. We're going to take a--

SNODGRASS: [Interposing] Wait, excuse me. I have a poster for each of you. Okay? Can I give these to someone?

FEMALE VOICE: Shelly.

SNODGRASS: Okay.

GREENO: And we're going to take a 15 minute recess for bathroom and comfort.

FEMALE VOICE: Comfort - -.

GREENO: You comfort, clearly not ours.

[Music Playing]

GREENO: --to order at 2:15 from its

recess. And continuing with public comment. If there is anyone who is outside watching this on TV and you wanted to come comment, please come at this time. And, sir, what is your number?

FOSTER: I have good news, 93.

GREENO: 93? And there may be people without numbers and that's okay. It's public comment without numbers now. Go ahead.

Meet-244

Thank you. My name is Bob Foster [phonetic] and I live at 122 Iron Horse Place, which is just off Bennett Road and is within the city of Grass Valley. And I'm happy to be here and share my thoughts with you. The first thing I want to say is thank you for your service. This is not an easy gig and the, the process that, that we're embarked on here doesn't work without you. So on my behalf and the behalf of many others I'd like to say thank you.

Meet-245

And I'm a lifelong outdoorsman. I grew up on a stream that is very, very similar to

Meet-245

Wolf Creek. So, in approaching this, my thoughts about this proposed project, that's my particular concern, is, is the area on, on water and water quality, which is basically Chapter 4.8 of the DEIR.

I have read the entire DEIR. I have been over the water quality section numerous times and I find the DEIR to be completely inadequate in respect to many areas in the water quality area. And I recognize that the, the science with respect to water and water quality is difficult. And in my particular view, the science with respect to water and water quality is quite speculative.

And I find the DEIR in, in numerous regards with respect to the water quality area to be entirely speculative to the point where it is probably misleading.

Two areas that I'm going to--of the many areas of my concern that I'm going to address. And that is, number one, what happens when there is no longer compliance with water quality standards in this

Meet-245

project? The, the whole plan that is formulated and reviewed basically is-- assumes that there will be compliance all the way along. There is nothing with respect to what happens when there is no compliance. And the plan is completely inadequate in that respect.

I suggest that you send this back to the--to the planners and get more information on what happens when there isn't compliance - - with respect to the - -. And I have specific questions on that which I will submit in writing.

GREENO: Perfect, and you will get a response to those questions as well. And they will be part of the final EIR in addition. Thank you, Bob.

Nobody outside there, Tyler? Okay. We might have come to that time.

FEMALE VOICE: Do you wish to speak? - - everybody was polite and nice and quiet.

GREENO: Okay, one more. We talked him into it.

BAKER: Hi there. My name is Gary Baker [phonetic]. I was here for another matter upstairs and we just noticed that the Commission hearing was going on. And I'm just asking for a moment because, you know, I sent in written comments on this environmental document. You know, it's 1,100 and some odd pages and I read them all.

Meet-246

There unfortunately were not appendices available, you know, to download or to review. And it's kind of, you know, difficult to get around and go to the library to read the appendices which is very different than what was provided to us during the cannabis EIR three years ago. That one, I submit, is some 800 pages of written comments. So I thought my eight pages this time was a little bit more abbreviated.

Meet-247

However, I still had some concerns, you know, related to the project, specifically related to the traffic and the inability to determine if the truck traffic was actually

Meet-248

Meet-248

included in the environmental review because there's three different conflicting statements in the traffic portion of the document. And one of those statements said that truck traffic was not included in the evaluation.

And the second issue that I had recognized in reviewing this document was the visual impact. I didn't understand why you needed 165 foot tower. Nor could I understand how the environmental document did not address buildings which could be 45 feet in height being sided on pads that were being graded as part of the mining operations such as hauling the material off to build the pads. And so but the environmental, you know, document and all the exhibits were just showing the visual impact of just the pad and they neglected to show what that impact would be with a 45-foot building on top of it. And those were my two significant comments on the document and those are all included in the responses

Meet-249

Meet-249

I sent off a couple months ago. And thank you for the time. And I've never finished early yet and...

GREENO: There you go. Thanks, Gary. Okay. Seeing no further folks looking to comment, I will close public comment at 2:22.

[END NEVADA COUNTY PUBLIC COMMENT HEARING_IDAHO-MARYLAND MINE_3.24.2022]

C E R T I F I C A T E

I, Brandi Chamberlain, certify that the foregoing transcript is a true record of said proceedings, that I am not connected by blood or marriage with any of the parties herein nor interested directly or indirectly in the matter in controversy, nor am I in the employ of the counsel.

Signature: 

Date: May 2, 2022

C E R T I F I C A T E

I, Anne Edelmann, certify that the foregoing transcript is a true record of said proceedings, that I am not connected by blood or marriage with any of the parties herein nor interested directly or indirectly in the matter in controversy, nor am I in the employ of the counsel.

Signature: Anne Edelmann

Date: ___ May 3, 2022_____

DEIR MEETING

Response to Comment Meet-1
Please see Master Response 1.

Response to Comment Meet-2
The commenter provides introductory and background information regarding the Communication Environmental Advocates Foundation and expresses general concerns regarding the adequacy of the DEIR, but does not provide specifics. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Regarding air pollution, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding concerns about water quality, please see Chapter 4.8 of the DEIR and Master Response 35 – Discharge to South Fork Wolf Creek.

Response to Comment Meet-3
The commenter states the technical analysis, particularly related to air quality and hydrology, is inadequate, but does not provide enough detail to formulate a response. The commenter's opinion is noted for the decisionmakers. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-4
Please see Chapter 1.0, Section 1.3, of the DEIR and Master Response 4 - Clean-Up Project is a Separate Project Under CEQA.

Response to Comment Meet-5
The comment is a conclusory statement and refers to a written comment letter from the Communication Environmental Advocates Foundation dated March 30th. The comment letter referred to is included in this Final EIR as Group Letter 7, and responses to the comments therein have been provided.

Response to Comment Meet-6
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-7
With respect to concerns regarding groundwater, effects on nearby wells, and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change. Please also see Responses to Comments Grp 21-4 and Grp 21-110.

Response to Comment Meet-8
The groundwater model does not assume that the rock is homogenous and includes changes in hydraulic conductivity with depth, geological units, and faults. Please see Chapter 4.8 of the DEIR and Appendices K.2 and K.3 of the DEIR and Master Response 14 - Adequacy of Groundwater Model. Please also see Responses to Comments Grp 7-69, Grp 21-4, and Grp 21-110.

Response to Comment Meet-9
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-10
Please see Response to Comment Ind 648-5.

Response to Comment Meet-11
Please see Response to Comment Ind 648-9.

Response to Comment Meet-12
Please see Response to Comment Ind 648-22.

Response to Comment Meet-13
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-14
Please see Responses to Comments Ind 831-6 and Ind 831-23 regarding fugitive dust mitigation, and Response to Comment Ind 831-3 regarding emissions associated with blasting and implementation of the Asbestos Dust Mitigation Plan. Master Response 23 - Adequacy of Sampling – Asbestos discusses the adequacy of asbestos sampling. The commenter's request to include additional air quality monitoring stations has been noted for the record.

Response to Comment Meet-15
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-16
Please see Response to Comment Ind 617-5.

Response to Comment Meet-17
Nighttime noise is analyzed in Chapter 4.10 of the DEIR and was determined to be less-than-significant, according to the applicable thresholds of significance, after mitigation. Please also see Responses to Comments Grp 21-130 and 21-131.

Response to Comment Meet-18
Please see Response to Comment Ind 685-8.

Response to Comment Meet-19
The comment is introductory and provides background information regarding the County's Energy Action Plan. The comment does not address the adequacy of the DEIR.

Response to Comment Meet-20
Please see Master Response 25 - Nevada County Energy Action Plan.

Response to Comment Meet-21
Please see Master Response 27 - Greenhouse Gas Thresholds.

Response to Comment Meet-22

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-23

Please see Master Response 5 - Discharge to South Fork Wolf Creek, Master Response 14 – Adequacy of Groundwater Model, and Master Response 15 – Adequacy of Groundwater Monitoring Wells. In addition, please refer to Impact 4.8-1 of Chapter 4.8, Hydrology and Water Quality, of the DIER. As presented therein, the DEIR has already concluded that the project may have a potentially significant impact on water quality and has identified mitigation measures to address this potential impact. The mitigation measures include a requirement to submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin. The NOI shall include evaluation of potential constituents of concern and demonstrate that the water treatment plant design shall successfully treat mine water to meet the water quality standards and treatment goals. The proposed water treatment plant is designed to remove iron and manganese and arsenic if it were present. Additionally, the DEIR's analysis, including the water sampling and conclusions regarding water quality, were prepared by water quality experts, and then reviewed by the County's independent water quality experts, who concurred with the conclusions. It is noted that Mitigation Measure 4.8-1(e) has been revised. Please see Chapter 3, Revisions to Text, of this Final EIR, for the revised text.

Response to Comment Meet-24

Please see Response to Comment Ind 664-18.

Response to Comment Meet-25

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-26

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-27

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-28

The comment lists several concerns related to the analysis included in the DEIR, including impacts related to surface water quality, groundwater, air quality, greenhouse gas emissions, energy use, noise, and vibration. However, the level of detail provided is insufficient to allow for a detailed response. The commenter's concerns have been noted for the record.

Regarding concerns about water quality, please see Master Response 35. Regarding effects on nearby wells, please see Master Response 14 - Adequacy of Groundwater Model and Master Response 15 - Adequacy of Groundwater Monitoring Wells. Regarding air pollution, including toxic air contaminants such as asbestos, as well as electricity consumption, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Also see Master Responses 21 and 22. With regard to concerns about noise pollution, please refer to Chapter 4.10, Noise and Vibration, of the DEIR.

Response to Comment Meet-29
As summarized in DEIR section 6.2, and provided in CEQA Guidelines section 15126.6, an EIR shall provide a reasonable range of alternatives that achieves the project objectives but avoids or reduces significant project impacts. The alternative analysis in Section 6.2 of the DEIR considered nine different alternatives. Five alternatives were considered but rejected from detailed analysis given that they did not meet most project objectives, were infeasible, and/or did not avoid significant project impacts. Four alternatives were analyzed in detail. (See DEIR Section 6.3.) The County believes this provides a reasoned choice of alternatives for consideration by the public and decisionmakers.

Response to Comment Meet-30
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-31
The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

Response to Comment Meet-32
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-33
Please see Response to Comment Ind 129-1.

Response to Comment Meet-34
Please see Response to Comment Ind 129-2.

Response to Comment Meet-35
Please see Response to Comment Ind 129-3.

Response to Comment Meet-36
Please see Response to Comment Ind 129-4.

Response to Comment Meet-37
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-38
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-39
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Responses 1 and 2.

Regarding toxic waste, please see Master Response 8 - Mine Waste Characterization. Regarding effects to Wolf Creek, please see Chapter 4.8 of the DEIR, Master Response 35 - Discharge to South Fork Wolf Creek, and Master Response 36 – Flows in South Form Wolf Creek. Please see Master Response 29 – Near Surface Workings, regarding sink hole concerns.

Faults in the area are identified and addressed in the DEIR – see Chapter 4.6, Geology, Soils, and Mineral Resources.

Response to Comment Meet-40

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-41

The commenter expresses general concerns regarding the project, but without further specificity, a detailed response is not possible.

Regarding effects on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Please refer to Master Response 4, Cleanup Project is a Separate Project Under CEQA, for a discussion related to cleanup of the Centennial Site as the environmental baseline.

Impact 4.10-3 of Chapter 10, Noise and Vibration, of the DEIR includes an evaluation of operational noise associated with the proposed project, including blasting, traffic, and water treatment. As described therein, with the implementation of Mitigation Measure 4.10-3, the impact would be reduced to a less-than-significant level.

Response to Comment Meet-42

The County has determined that recirculation of the DEIR is not required as the factors set forth under CEQA Guidelines 15088.5 for recirculation are not met.

The commenter expresses general concerns regarding air quality and water quality, but without further specificity, a detailed response is not possible. Air pollution is addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-43

The commenter expresses general concerns related to groundwater impacts, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues and 14 - Adequacy of Groundwater Model.

Response to Comment Meet-44

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-45

Please see Response to Comment Ind 736-1 and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-46

Please see Responses to Comment Ind 736-2.

Response to Comment Meet-47
Please see Response to Comment Ind 736-3.

Response to Comment Meet-48
Please see Response to Comment Ind 736-4.

Response to Comment Meet-49
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-50
See Responses to Comments Ind 353-1 through Ind 353-15, particularly Ind 353-1, Ind 353-5, and Ind 353-9.

Response to Comment Meet-51
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-52
See Responses to Comments Ind 585-2 through Ind 585-5.

Response to Comment Meet-53
The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-54
The commenter expresses general concerns related to the proposed project, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-55
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-56
Please see Responses to Comments Ind 548-3 and Ind 548-6, as well as Master Response 5 - Evacuation Zones and Master Response 6 – Wildfire Impacts.

Response to Comment Meet-57
Please see Master Response 5 - Evacuation Zones and Master Response 6 – Wildfire Impacts.

Response to Comment Meet-58
Please see Responses to Comments Ind, 548-19, Ind 548-13, and Ind 548-15.

Response to Comment Meet-59
Please see Response to Comment Ind 548-21.

Response to Comment Meet-60
Please see Response to Comment Ind 548-22.

Response to Comment Meet-61
The comment is conclusory and has been noted for the record.

Response to Comment Meet-62
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-63
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-64
The commenter expresses general concerns regarding impacts to wells, but without further specificity, a detailed response is not possible. Please see Master Response 1 - Non-EIR/Administrative Issues.

With regard to impacts on nearby wells, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-65
Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-66
Please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-67
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-68
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-69
Please see Response to Comment Agcy 10-1.

Response to Comment Meet-70
Please see Response to Comment Agcy 10-4.

Response to Comment Meet-71
Please see Response to Comment Agcy 10-6.

Response to Comment Meet-72
Please see Responses to Comments Agcy 10-9 and Agcy 10-10.

Response to Comment Meet-73
Please see Response to Comment Agcy 10-9.

Response to Comment Meet-74
Please see Response to Comment Agcy 10-11.

Response to Comment Meet-75
Please see Response to Comment Ind 671-1.

Response to Comment Meet-76
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-77
Please see Response to Comment Grp 13-2 and Grp 13-6, and Grp 13-7.

Response to Comment Meet-78
Please see Response to Comment Grp 13-18.

Response to Comment Meet-79
As discussed in Master Response 30 - Biological Study Technical Adequacy, the site (including the pond within the Brunswick Industrial Site) has been subject to extensive biological surveys, peer review, and analysis in the DEIR. Please see Response to Comment Grp 13-2 and Master Response 38 – Foothill Yellow Legged Frog and California Red Legged Frog.

Response to Comment Meet-80
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-81
Please see Response to Comment Grp 13-2 and Grp 13-6, and Grp 13-7.

Response to Comment Meet-82
Please see Response to Comment Grp 13-11 and Master Response 37, Birds and Raptors.

Response to Comment Meet-83
Please see Response to Comment Grp 13-7.

Response to Comment Meet-84
Please see Response to Comment Grp 13-5.

Response to Comment Meet-85
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-86
Impacts related to aesthetics is addressed in Chapter 4.1 of the DEIR. As noted in Chapter 4.1, Aesthetics, of the DEIR, according to the court ruling in *Preserve Poway v. City of Poway* (2016) 245 Cal. App.4th 560 [199 Cal.Rptr. 3d 600], community character is separate and apart from aesthetic impacts and, thus, is not a CEQA issue. Rather, the analysis of aesthetics, pursuant to CEQA, is limited to tangible, physical evidence that a project is visually inconsistent with the surrounding community (rather than a psychological "feel"). Therefore, the analysis presented within the DEIR appropriately focuses on potential physical changes to visual composition of the project sites and surrounding area, rather than subjective natural beauty.

Response to Comment Meet-87
The comment expresses concerns related to the analysis of cumulative impacts, but does not provide specific details for which to respond to. Please refer to the Cumulative Impacts and Mitigation Measures section of each technical chapter of the DEIR for a discussion of cumulative impacts related to each CEQA topic. Quality of life concerns are outside the scope of CEQA – Please see Master Response 2 – Social and Economic Impacts.

Response to Comment Meet-88
The comment does not address the adequacy of the DIER.

Response to Comment Meet-89
Please refer to Responses to Comments Ind 332-1 through Ind 332-3.

Response to Comment Meet-90
Please see Responses to Comments Ind 332-4 and Ind 332-5.

Response to Comment Meet-91
The comment is introductory and expresses general concern related to the evaluation of groundwater included in the DEIR, but does not provide details for which to respond to. Please refer to Master Response 14 - Adequacy of Groundwater Model.

Response to Comment Meet-92
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-93
The comment does not address the adequacy of the DEIR. Social and economic impacts are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-94
Please see Response to Comment Ind 254-1 and Ind 254-3.

Response to Comment Meet-95
Quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-96
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-97
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Please also see Response to Comment Ind 295-5.

Regarding concerns about increased truck traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Response to Comment Meet-98
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-99
Please see Response to Comment Ind 295-4.

Response to Comment Meet-100
The commenter expresses general concerns regarding the aesthetic impacts related to truck traffic, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Impacts related to aesthetics are addressed in Chapter 4.1, Aesthetics, of the DEIR.

Response to Comment Meet-101
Please see Response to Comment Ind 295-3.

Response to Comment Meet-102
Please see Response to Comment Ind 295-7.

Response to Comment Meet-103
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-104
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-105
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-106
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-107
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-108
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-109
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-110
The commenter expresses general concerns regarding adverse effects on residents, but without further specificity, a detailed response is not possible. Please see Master Response 1.

Response to Comment Meet-111
The commenter expresses general concern related to the volume of dewatering proposed, but without further specificity, a detailed response is not possible. Please see Master Response 1.

With respect to concerns regarding effects on nearby wells, please see please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-112
With respect to concerns regarding effects on nearby wells, please see please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, and Master Response 15 - Adequacy of Groundwater Monitoring Wells.

Response to Comment Meet-113
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-114
Please refer to Master Response 29 – Near Surface Workings and Subsidence.

Response to Comment Meet-115
Please see Response to Comment Grp 15-7.

Response to Comment Meet-116
Please see Response to Comment Grp 15-9.

Response to Comment Meet-117
Please see Response to Comment Grp 15-10.

Response to Comment Meet-118
Please see Response to Comment Grp 15-11.

Response to Comment Meet-119
Please see Response to Comment Grp 15-12. In addition, economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-120
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-121
Please see Response to Comment Ind 266-2.

Response to Comment Meet-122
The commenter expresses general concerns associated with the environmental setting presented in the DEIR related to biological resources, but without further specificity, a detailed response is not possible. Please refer to Master Response 1 - Non-EIR/Administrative Issues. In addition, please see Responses to Comments Ind 266-11 and Ind 266-16.

Response to Comment Meet-123
Please see Responses to Comments Ind 266-12 through Ind 266-16.

Response to Comment Meet-124
Please see Response to Comment Ind 266-14, Ind 266-22, and Ind 266-39.

Response to Comment Meet-125
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-126
The comment introduces concerns related to biological resource impacts and does not address the adequacy of the DEIR.

Response to Comment Meet-127
Please see Response to Comment Grp 32-6.

Response to Comment Meet-128
Please see Response to Comment Grp 32-7

Response to Comment Meet-129
Please see Response to Comment Grp 32-7

Response to Comment Meet-130
Please see Response to Comment Grp 32-8 and Grp 31-56.

Response to Comment Meet-131
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-132
Please see Response to Comment Grp 31-56.

Response to Comment Meet-133
Please see Responses to Comments Grp 31-63 through Grp 31-66.

Response to Comment Meet-134
Please see Responses to Comments Grp 32-11.

Response to Comment Meet-135
Please see Responses to Comments Grp 32-11.

Response to Comment Meet-136
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-137
The commenter expresses general concern related to the wording choice included in the public comment meeting staff report, and does not address the adequacy of the DEIR. Please see Response to Comment Grp 31-62.

Response to Comment Meet-138
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-139
Please see Responses to Comments Ind 24-2 and Ind 24-3.

Response to Comment Meet-140
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-141
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-142
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-143
Please see Response to Comment Ind 253-2.

Response to Comment Meet-144
The comment does not address the adequacy of the DEIR. Economic and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-145
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-146
Please see Response to Comment Ind 432-1.

Response to Comment Meet-147
Please see Response to Comment Ind 432-3.

Response to Comment Meet-148
Please see Response to Comment Ind 432-4.

Response to Comment Meet-149
Please see Response to Comment Ind 432-6.

Response to Comment Meet-150
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-151
The comment provides background regarding the commenter's professional qualifications, and does not address the adequacy of the DEIR.

Response to Comment Meet-152
Please see Response to Comment Ind 522-1. In addition, Economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-153
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-154
Given that the proposed project would result in GHG emissions during construction that would exceed the applied threshold of 1,100 MT CO_2e per year, mitigation has been applied to reduce emissions to a less-than-significant level. As demonstrated in the DEIR, estimated operational GHG emissions would be below the applied numeric threshold of 10,000 MT CO_2e per year during any of the years of activity and, therefore, were deemed less than significant. CEQA does not require mitigation for impacts that are less than significant. Please see Master Response 27 - Greenhouse Gas Thresholds and Master Response 28 - Greenhouse Gas Credits.

Response to Comment Meet-155
The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-156
Please see Response to Comment Ind 523-1.

Response to Comment Meet-157
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-158
Please see Responses to Comments Agcy 10-1 and Agcy 10-13.

Response to Comment Meet-159
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-160
The comment does not specifically address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-161
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues. In addition, please refer to Chapter 4.8, Hydrology and Water Quality, and Chapter 4.11, Public Services and Utilities, of the DEIR related to water consumption and discharge.

Response to Comment Meet-162
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-163
Please see Responses to Comments Ind 257-2 through Ind 257-4.

Response to Comment Meet-164
Please see Responses to Comments Ind 257-5 and Ind 257-6.

Response to Comment Meet-165
Please see Response to Comment Ind 257-9.

Response to Comment Meet-166
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-167
Please see Responses to Comments Ind 388-2, Ind 388-4, and Ind 388-5.

Response to Comment Meet-168
Please see Response to Comment Ind 388-6.

Response to Comment Meet-169
Please see Responses to Comments Ind 388-2, Ind 388-4 through Ind 388-6, and Ind 388-10.

Response to Comment Meet-170
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-171
Property values and economic concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-172
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-173
Please see Responses to Comments Agcy 10-9 and Agcy 10-10.

Response to Comment Meet-174
Please see Responses to Comments Agcy 10-6, Agcy 10-7, and Agcy 10-10.

Response to Comment Meet-175

Please see Responses to Comments Ind 679-10 through Ind 679-14.

Response to Comment Meet-176

The commenter expresses general concerns regarding collapsing tunnels, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Responses to Comments Ind 679-18 through Ind 679-20.

Response to Comment Meet-177

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-178

The commenter expresses general concerns regarding air quality and associated mitigation measures, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues. Regarding air quality concerns, please refer to the discussion within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR, as well as Master Response 18 – Air Quality Thresholds, Master Response 24 - Project Construction Schedule, and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Meet-179

Please see Master Response 2 – Social and Economic Impacts and Master Response 3 - Operator Responsibility.

Response to Comment Meet-180

Noise from activities has been analyzed in Chapter 4.10 of the DEIR and was determined to be less than significant after mitigation. Please see Chapter 4.10 of the DEIR. Furthermore, while the DEIR determined, based on best available data, that the proposed operations would not result in noise levels that would exceed the County's thresholds, the DEIR conservatively concludes that the proposed project could result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and the project's noise impacts could be significant. As a result, the DEIR includes Mitigation Measure 4.10-3, which requires implementation of a robust, ongoing noise monitoring program. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. The County's third-party noise consultant is required to retrieve and evaluate mine-related operational noise levels within 30 days of commencement of mining, quarterly thereafter for the first five years, and then once per year thereafter for the life of the project. If noise levels are found to exceed the County's standards, then operation of the mine shall cease, until additional engineering controls can be implemented as needed.

Please also see Master Response 2 – Social and Economic Impacts and Master Response 3 - Operator Responsibility.

Response to Comment Meet-181
Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Program for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. Impacts related to air quality and GHG are addressed in Chapter 4.3, Air Quality, Greenhouse Gas Emissions, of the DEIR. Please see Master Response 3 - Operator Responsibility, Master Response 18 – Air Quality Thresholds, and Master Response 27 – Greenhouse Gas Thresholds.

Response to Comment Meet-182
The comment expresses general opinions regarding the proposed project, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues.

Response to Comment Meet-183
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-184
Please see Responses to Comments Ind 658-3 and Ind 658-4.

Response to Comment Meet-185
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-186
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-187
Please see Responses to Comments Grp 25-10, Grp 25-12, and Grp 25-13.

Response to Comment Meet-188
Please see Response to Comment Grp 25-34.

Response to Comment Meet-189
Please see Response to Comment Grp 25-37.

Response to Comment Meet-190
Please see Responses to Comments Grp 25-45 and Grp 25-46.

Response to Comment Meet-191
The comment is conclusory and does not address the adequacy of the DEIR.

Response to Comment Meet-192
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-193
The comment does not specifically address the adequacy of the DEIR. The comment incorrectly asserts that the Centennial Site is designated as a “Superfund” site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) by the USEPA. The Centennial Site has never been on the National Priorities List (A “Superfund site”). Please refer

to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for further information. In addition, please see Master Response 4 – Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-194

Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Response to Comment Meet-195

The comment expresses general concerns related to arsenic and water, but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1 - Non-EIR/Administrative Issues. Also see Response to Comment Meet-193 above regarding the project not being a Superfund site. Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for further information related to existing arsenic concentrations on the project site, as well as Chapter 4.3, Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy related to toxic air contaminants such as arsenic.

Response to Comment Meet-196

The commenter expresses general concerns regarding the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-197

The comment does not address the adequacy of the DEIR. Please see Master Response 1 - Non-EIR/Administrative Issues and Master Response 3 – Operator Responsibility.

Response to Comment Meet-198

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-199

The comment does not address the adequacy of the DEIR.

Response to Comment Meet-200

The commenter expresses general concerns regarding the hydrology report, but does not specifically address the adequacy of the DEIR or provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-201

The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.12, Transportation, of the DEIR for additional information related to impacts associated with transit facilities.

Response to Comment Meet-202

The comment does not address the adequacy of the DEIR. Please refer to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR for additional information related to impacts associated with the hauling of hazardous materials.

Response to Comment Meet-203
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-204
The comment does not address the adequacy of the DEIR. Impacts related to biological resources are evaluated in Chapter 4.4, Biological Resources, of the DEIR; impacts related to hydrology and water quality, including erosion, are addressed in Chapter 4.8 of the DEIR; and impacts related to erosion are also addressed in Chapter 4.6 of the DEIR.

Response to Comment Meet-205
The comment does not address the adequacy of the DEIR. Air quality, including toxic air contaminants and asbestos, is addressed within Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR.

Response to Comment Meet-206
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-207
The commenter expresses general concerns regarding the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-208
Please see Response to Comment Grp 2-4.

Response to Comment Meet-209
The comment is conclusory and does not address the adequacy of the DEIR.

Response to Comment Meet-210
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-211
Please see Response to Comment Grp 2-4 and Master Response 30 - Biological Study Technical Adequacy.

Response to Comment Meet-212
Please see Response to Comment Grp 2-5.

Response to Comment Meet-213
Please see Response to Comment Grp 2-7.

Response to Comment Meet-214
Please see Response to Comment Grp 2-4 through Grp 2-7, Grp 2-9, Grp 7-31, and Grp 13-2, as well as Master Response 30 - Biological Study Technical Adequacy, Master Response 37 – Birds and Raptors, and Master Response 38 - Foothill Yellow Legged Frog and California Red Legged Frog.
Grp 13-2

Response to Comment Meet-215
The commenter expresses general concerns regarding the project but does not specifically address the adequacy of the DEIR. Thus, a detailed response is neither possible nor required. Please see Master Response 1. Property values and quality of life concerns are outside the scope of CEQA – Please see Master Response 2.

Regarding air quality, please refer to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, of the DEIR. Regarding noise and vibration, please refer to Chapter 4.10, Noise and Vibration, of the DEIR. Regarding traffic, please refer to Chapter 4.12, Transportation, of the DEIR.

Response to Comment Meet-216
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-217
Please see Responses to Comments Grp 16-2 and Grp 16-5.

Response to Comment Meet-218
Please see Responses to Comments Grp 16-4, Grp 16-9, and Grp 16-11.

Response to Comment Meet-219
The comment does not address the adequacy of the DEIR.

Response to Comment Meet-220
The commenter expresses general concerns regarding the methodology used to assess air quality and water quality impacts, but does not provide specific examples or details. Thus, a detailed response is neither possible nor required. Please see Master Response 1.

Response to Comment Meet-221
The comment does not address the adequacy of the DEIR. With regard to concerns about the Project Applicant, the commenter is referred to Master Response 3 - Operator Responsibility.

Response to Comment Meet-222
Please see Responses to Comments Ind 562-1 and Ind 562-3.

Response to Comment Meet-223
Please see Responses to Comments Ind 562-1 and Ind 564-2.

Response to Comment Meet-224
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-225
The commenter expresses general concerns regarding the adequacy of the DEIR but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-226
Please see Response to Comment Ind 577-6.

Response to Comment Meet-227
Please see Responses to Comments Ind 577-10 and Ind 577-11.

Response to Comment Meet-228
Please see Responses to Comments Ind 577-15, Ind 577-16, and Ind 577-17.

Response to Comment Meet-229
Please see Response to Comment Ind 577-15.

Response to Comment Meet-230
The commenter does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

The proposed project has yet to be presented to the Nevada County Board of Supervisors for decision; thus, no component of the proposed project has been adopted by the Board. Chapter 4 of this Final EIR contains the Mitigation Monitoring and Reporting Program that will need to be adopted by the Nevada County Board of Supervisors, if the proposed project is approved.

With respect to concerns regarding effects on nearby wells and drought, please see Chapter 4.8 of the DEIR, Master Response 14 - Adequacy of Groundwater Model, Master Response 15 - Adequacy of Groundwater Monitoring Wells, and Master Response 16 – Drought and Climate Change.

Response to Comment Meet-231
The commenter expresses general concern related to downstream waterways and cultural resources, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-232
The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-233
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-234
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter is also referred to the Project Description chapter of the DEIR, which includes a description of the proposed Reclamation Plan. As presented therein, future use of the site would not include residential uses, nor is the site designated or zoned for residential use.

The commenter expresses general concerns regarding polluted water, air, and soil runoff, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-235
Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA.

Response to Comment Meet-236

Please see Master Response 4 - Cleanup Project is a Separate Project Under CEQA. The commenter is also referred to the Project Description chapter of the DEIR; specifically, as on page 2-3 of the DEIR, a Reclamation Plan and Financial Assurance Cost Estimate (FACE) will be required for the . The Reclamation Plan is provided in Appendix C of the DEIR.

Response to Comment Meet-237

Please see Response to Comment Meet-236 above. Please also see Master Response 3 – Operator Responsibility.

Response to Comment Meet-238

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-239

The comment does not address the adequacy of the DEIR. Please see Master Response 3 - Operator Responsibility.

Response to Comment Meet-240

A detailed analysis of impacts associated with explosives is included in Chapter 4.7, Hazards and Hazardous Materials. Specifically, Impact 4.7-1 addresses whether the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. As discussed therein, for transportation purposes, explosives are classified by the Department of Transportation (DOT) in accordance with 49 CFR and under these regulations all explosives are listed as Hazard Class 1 materials. Explosives would be transported directly to the site by licensed explosive suppliers that possess the requisite permits, including a California Highway Patrol (CHP) hazardous materials transportation license and DOT hazardous materials permits. Numerous regulations are in place to ensure safety in the transport of explosives and a summary of these are provided in Table 4.7-2 of the DEIR. All companies and individuals transporting explosives to the site would be required to comply with all regulations provided in Table 4.7-2.

In addition, issues related to increased hazards to vehicle safety are addressed in Chapter 4.12, Transportation, of the DEIR. Please also see Master Response 10 - Explosives, Reagents, and Brunswick fill.

Response to Comment Meet-241

The commenter expresses general concern related to the use of chemicals, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

The commenter is referred to Chapter 4.7, Hazards and Hazardous Materials, of the DEIR and Master Response 8 – Mine Waste Characterization.

Response to Comment Meet-242

The commenter expresses general concern related to the adequacy of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Response to Comment Meet-243

The commenter expresses general concern related to the mitigation measures of the DEIR, but does not provide sufficient specificity to provide a detailed response. Please see Master Response 1 – Non-EIR/Administrative Issues.

Chapter 4 of this Final EIR contains a Mitigation Monitoring and Reporting Plan for all the required mitigation measures. In addition, the project will undergo annual inspections as required by SMARA. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Meet-244

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-245

Please see Responses to Comments Ind 423-1 through Ind 423-4 and Meet-243 above. With respect to compliance with water quality standards, please see Chapter 4.8 of the DEIR, as well as Response to Comment Agcy 8-6 related to monitoring. Please also see Master Response 3 - Operator Responsibility.

Response to Comment Meet-246

The comment is introductory and does not address the adequacy of the DEIR.

Response to Comment Meet-247

Please see Response to Comment Ind 262-5

Response to Comment Meet-248

Please see Response to Comment Ind 262-8.

Response to Comment Meet-249

Please see Responses to Comments Ind 262-15 and Ind 262-16.

3. Revisions to the Draft EIR Text

3. REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft EIR Text chapter presents minor corrections, additions, and revisions made to the Draft EIR (DEIR) initiated by the Lead Agency (Nevada County) based on comments received during the public review period. The changes represent minor clarifications/amplifications of the analysis contained in the DEIR and do not constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the DEIR.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the DEIR.

2 Executive Summary

For clarification purposes, Table 2-1 in Chapter 2, Executive Summary, of the DEIR is hereby revised for Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy (Mitigation Measures 4.3-1[b], 4.3-2, and 4.3-7[b]); Chapter 4.4, Biological Resources (Mitigation Measures 4.4-1[a], 4.4-1[b], 4.4-2[b], 4.4-2[d], 4.4-2[e], 4.4-2[f], 4.4-2[g], 4.4-3[c], and 4.4-3[d]); Chapter 4.8, Hydrology and Water Quality (Mitigation Measures 4.8-1[a], 4.8-1[e], 4.8-2[a], and 4.8-2[c]); and Chapter 4.10, Noise and Vibration (Mitigation Measure 4.10-4) beginning on page 2-10. Rather than include the entirety of Table 2-1 from Chapter 2, Executive Summary, of the DEIR with the revisions shown where appropriate, only the mitigation measures that have been revised are presented below. The revisions to the Executive Summary table do not change the conclusions contained in the DEIR. Therefore, the revisions to Table 2-1 do not change the adequacy of the analysis or the conclusions contained in the DEIR.

3 Project Description

Page 3-19, DEIR Chapter 3, Section 3.7, fourth paragraph is hereby revised as follows:

> Mine development in nonmineralized "barren" rock (i.e., non-gold bearing) is expected to result in the production of approximately 500 tons per day (182,500 tons per year) of barren rock. The barren rock would be transported from the tunnel face to the mine shaft (using electric ~~or diesel~~-powered load/haul/dump vehicles, rail cars, and/or conveyors) to underground rock bins located adjacent to the shaft. The rock would then be loaded into the shaft skips, hoisted to the surface, and dropped into one of the compartments of the concrete silo located on the surface. The barren rock will then be transported by trucks on the surface for use as engineered fill.

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
4.3 Air Quality, Greenhouse Gas Emissions, and Energy			
4.3-1 Conflict with or obstruct implementation of the applicable air quality plan.	S	*4.3-1(b)* ***Construction Exhaust Emissions Minimization Plan.*** *Prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The Construction Exhaust Emissions Minimization Plan shall detail project compliance with the following requirements:* • *Where access to alternative sources of power and alternative-fueled equipment are available, portable diesel engines shall be prohibited.* • *All diesel-powered equipment with engines equal to or greater than 50 horsepower (hp) shall be powered by California Air Resources Board (CARB) certified Tier 4 Final engines. If 50 hp or greater engines that comply with Tier 4 Final emissions standards are not commercially available, then the project applicant shall ensure that all diesel-powered equipment equal to or greater than 25 hp shall have at least CARB-certified Tier 3 engines with the most effective Verified Diesel Emission Control Strategies available for the engine type, such as Level 3 Diesel Particulate Filters (Tier 4 engines automatically meet this requirement).*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		a. For purposes of this mitigation measure, "commercially available" shall mean the availability of the Tier 4 Final equipment~~, taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites~~. *b. The project applicant shall maintain and submit records to Nevada County concerning its efforts to comply with this requirement.*	
4.3-2 Expose sensitive receptors to substantial pollutant concentrations.	S	*4.3-2* ***Asbestos Dust Mitigation Plan.*** *Prior to the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The provisions of the ADMP shall be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 of the California Code of Regulations [CCR] Section 93105) contains specific requirements for the preparation of an ADMP. Conditions of the ADMP shall include the following:* • *Provisions of this ADMP shall apply throughout construction, operation, and*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		reclamation activities, except as specified otherwise. • *All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device. Sweeping or vacuuming on public roads shall be conducted so as to avoid peak AM and PM traffic hours.* • *A gravel pad designed and maintained to effectively clean tires of exiting vehicles, or a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project.* • *All active storage piles shall be adequately wetted or covered with plastic to ensure that no visible dust crosses the property boundary. Potential dust emissions from disturbed surface areas and storage piles that will remain inactive for more than seven days shall be controlled to completely prevent visible dust from crossing the property boundary by at least one of the following methods (pursuant to [e][4][C] of the ATCM):* *a. Keeping the surface adequately wetted;*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		b. Applying chemical dust suppressants or chemical stabilizers according to the manufacturer's recommendations and all applicable regulations; *c. Covering with tarp(s) or vegetative cover;* *d. Installing wind barriers of 50 percent porosity around three sides of all storage piles; and/or* *e. Installing wind barriers across open areas and between the project sites and any adjacent occupied residential or business property.* • *The maximum vehicle speed on all unpaved parts of the project sites must be clearly posted and must not exceed 15 miles per hour.* • *All areas where vehicles drive on the site, at all times when the area is subjected to vehicle or equipment traffic, shall be watered every two hours or kept adequately wetted to prevent visible dust emissions from leaving the property boundary, except where a gravel cover has been established that has a silt content of less than five percent and an asbestos content of less than 0.25 percent and is at least three inches thick.* • *For all earthmoving activities, at least one of the following methods of dust control shall be*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		implemented, pursuant to (e)(4)(E) of the ATCM: *a. Pre-wetting the ground to the depth of anticipated cuts; and/or* *b. Suspending grading operations when visible dust emissions from any aspect of the grading (including tires, fans, and exhaust) cross the property line.* • *Trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings.* • *All loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation, pursuant to (e)(4)(F)2 of the ATCM, and shall either:* *a. be completely covered with tarps; or* *b. have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.* • *Upon completion of the project, disturbed surface areas shall be stabilized, pursuant to (e)(4)(G) of the ATCM, using one or more of the following methods:* *a. establishment of a vegetative cover;*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		b. placement of at least three inches of material having an asbestos content of 0.25 percent asbestos or less as measured using an approved asbestos bulk test method; and/or *c. paving.* • *The NSAQMD's Air Pollution Control Officer may require bulk sampling at any time. If bulk sampling is required, the sampling shall be performed in accordance with California Air Resources Board Test Method 435. Where Method 435 specifies "serpentine," this shall apply to gravel, decomposed ultramafic rock, and any other material as specified by the Air Pollution Control Officer.* • *The NSAQMD's Air Pollution Control Officer may require air monitoring at any time, and may modify the ADMP on the basis of results of the monitoring. If required, provisions of air monitoring shall be determined in coordination with the NSAQMD.* • *Before site disturbance (e.g., clearing, grubbing, or grading) begins, the NSAQMD shall be informed by telephone at (530) 274-9360 of the exact day on which site disturbance will commence.*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures		Level of Significance After Mitigation
4.3-7 Generation of GHG emissions that may have a significant impact on the environment.	CC	*4.3-7(b)*	***Carbon Offsets – Construction Emissions.*** *Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO_2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling ~~2,664~~ 2,345 CO_2e, which was calculated by subtracting 1,100 MT CO_2e (threshold) from the construction emissions generated by the project.* ***Carbon Offset Standards – Eligible Registries, Acceptable Protocols and Defined Terms:*** *"Carbon offset" shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard). This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities within the Nevada County region. The Project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols. Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the "Reporting and Enforcement Standards" below is submitted to the County demonstrating that each registry shall*	LCC

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		continue its existing practice of requiring the following for the development and approval of protocols or methodologies: *i) Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and* *ii) Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:* *a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;* *b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		considered potential leakage and quantification uncertainties; *c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,* *d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time.* *e. Be approved by the California Air Resources Board, and be compliant with 17 CCR § 95972 and AB 32 (the California Global Warming Solutions Act of 2006) to the extent applicable to voluntary offsets.* *Further, any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past ~~or forecasted~~ reduction or sequestration of one MT of CO_2e that is "not otherwise required" (CEQA Guidelines Section 15126.4[c][3]). Each carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows:* *i) "Additional" means that the carbon offset is ~~not~~ in addition to: (1) any greenhouse gas emission reduction otherwise required by law*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		or regulation~~,~~; ~~and not~~ (2) any other GHG emissions reduction that otherwise would occur; and (3) is consistent with Health and Safety Code Section 38562(d)(2); *ii) "Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage;* *iii) "Verifiable" means that the GHG reduction underlying the carbon offset is well documented, transparent and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI);* *iv) "Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction;* *v) "Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		boundary of the carbon offset project, while accounting for uncertainty and leakage; and *vi) "Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.* *The protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below ensure that the emissions reductions required by this mitigation measure are enforceable against Rise, as the County has authority to hold Rise accountable and to take appropriate corrective action if the County determines that any carbon offsets do not comply with the requirements set forth in this mitigation measure.* *The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program). *Additionally, the County shall require that all carbon offsets purchased by the Project applicant shall originate from inside the state of California.* ***Reporting and Enforcement Standards:*** *Prior to issuance of requested grading permits, Rise shall submit a report to the County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the report shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offsets to be retired, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and information sufficient for the County to verify that the purchased offsets meet the requirements identified within this mitigation.* *To ensure consistent and effective enforcement of this mitigation measure and to assist the County with*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		its review of the report described above, an implementation process timeline and associated flow chart for the implementation and administration of this mitigation measure's requirements has been prepared and is attached as Appendix F to the FEIR. *If the County determines that the project's carbon offsets do meet the requirements of this mitigation measure, the offsets can be used to reduce project GHG emissions and project permits shall be issued. If the County determines that the project's carbon offsets do not meet the requirements of this mitigation measure, the offsets cannot be used to reduce project GHG emissions and project permits shall not be issued. Additionally, the County may issue a notice of non-consistency and cease permitting activities in the event that the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until Rise has demonstrated that the previously provided carbon offsets are compliant with the standards herein or have provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction. In the event that the project is out of compliance with this Mitigation Measure and fails to demonstrate compliance after receiving notice of said violation, the County shall have authority to impose administrative penalties, take legal action to force*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		compliance, or to start proceedings to suspend or revoke the Project's permits.	
4.4 Biological Resources			
4.4-1 Have a substantial adverse effect to special-status plant species either directly or through habitat modifications.	S	*Pine Hill Flannelbush* *4.4-1(a) i. Prior to issuance of grading permits for the Centennial Industrial Site, the project applicant shall obtain an Incidental Take Permit (ITP) from CDFW for Project-related impacts to the Pine Hill Flannelbush. During the consultation process with CDFW, the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP) shall be revised if required by CDFW, and must be approved by CDFW prior to implementation. This HMP shall include habitat enhancement and conservation easement requirements. If the USFWS determines that the plants within the Study Area are the federally endangered Pine Hill flannelbush prior to project implementation, then a USFWS Biological Opinion must also be secured, and the USFWS would also need to approve the HMP prior to implementation. Note that the measures outlined below are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.* *Prior to issuance of grading permits for the Centennial Industrial Site, implement project-specific mitigation measures 1-3 outlined below consistent with the County and CDFW approved HMP, as well as the Habitat Enhancement and*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Conservation Easement. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits).~~implement project-specific mitigation measures 1-3 within the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP), to the satisfaction of the County, USFWS and CDFW. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits):~~ 1. *Seed Collection;* *Collect seed for seedbanking and for future replacement and recovery efforts pursuant to the requirements of Section 6.2 of the HMP.* 2. *Develop Transplantation Plan and Monitoring Plan;*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		The Transplantation and Monitoring Plan shall be developed in consultation with USFWS and CDFW, and shall, at a minimum, address location(s) for dormant season relocation, site selection for transplanting, and metrics of successful establishment (i.e., Section 6 of the HMP). *3. Transplanting;* *Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.* *4. Transplant Monitoring; and* *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants,*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		transplanting will have been deemed successful. *5. Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)* *If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken:* • *Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.* • *Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.* • *Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.* • *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.* *ii. Habitat Enhancement: Prior to issuance of grading permits, pursuant to the HMP, the applicant shall enhance Pine Hill flannelbush*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		habitat outside the disturbance footprint, which could include removal of invasive plants and conducting a pilot study by collaborating with CAL FIRE or other research facility to conduct prescribed fire in areas to enhance natural germination and recruitment, as Pine Hill flannelbush need fire for successful germination, and root sprouts. *iii. <u>Conservation Easement:</u> Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any offsite areas not owned by the applicant where the transplants are to be located.* *Other Special-Status Plant Species* *4.4-1(b) Prior to issuance of grading permits for the Centennial Industrial Site and Brunswick Area (i.e., Brunswick Industrial Site and East Bennett Road ROW), focused plant surveys shall be performed*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		according to CDFW and CNPS protocol (e.g., "Procotols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities", CDFW 2018), as generally described below. If special-status plant species (i.e., federal and/or state endangered, threatened, or proposed candidates for listing; CRPR Lists 1 or 2) are not found during appropriately timed focused surveys, then further mitigation is not necessary. The results of the surveys shall be submitted to the Nevada County Planning Department. *Prior to Improvement Plan approval for each phase of the project, focused surveys shall be performed by a qualified botanist during the appropriate early blooming period ~~(April to May)~~ for those special-status plant species identified in the Biological Resources Assessments as potential occurring within the Centennial Industrial Site and/or Brunswick Area. Furthermore, should additional plants having the potential to occur within these areas be given special-status in the future, the qualified botanist shall also determine the presence/absence of such species. The survey(s) shall be conducted on-site as well as in any off-site improvement areas, as applicable for each phase, during the early identification periods (bloom periods) for all potentially occurring special-status plant species. If the special-status plant species are not found to be present during the focused survey(s), then no further action is required.*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		The results of the focused surveys shall be submitted to the Nevada County Planning Department. *If any special-status plant species are found, ~~protection of such plant shall include complete avoidance, transplantation, or on- or off-site restoration of the special-status plant species that could be impacted by site disturbance. These protective measures for such plants shall be included as part of the required development of a Habitat Management Plan (HMP) as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12, which includes regulations intended to avoid the impact of development on rare, threatened, endangered, and special-status species and their habitat, or where avoidance is not possible, to minimize or compensate for such impacts and to retain their habitat as non-disturbance open space~~ and they are located in an area where impacts are proposed, then the special-status plants shall be completely avoided until a Habitat Management Plan (HMP) is developed and approved by the Nevada County Planning Department. If the plant is listed on the federal or state Endangered Species lists or is state listed as rare, then development of this plan shall be conducted in consultation with USFWS and/or CDFW, respectively, and a BO and/or an ITP shall be obtained prior to impacts. The HMP shall include the avoidance, minimization, and mitigation measures outlined below as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12. Note that transplantation*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		and monitoring specifics are examples only, and final details will be developed based on the species to be impacted, if any. *At a minimum, the HMP shall include the following protective measures for special-status plant species with the potential to be impacted by the proposed disturbance:* • *a map of the location of special-status species that may be disturbed or need to be protected;* • *location of environmental protection fencing to be placed around the individual plants to be protected;* • *identification of the location of protected plants on design and construction drawings;* • *environmental awareness training for all personnel working on the project during initial site disturbance to discuss the location of the protected plants and the measures to be taken to avoid impacts to them; and* • *a qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special-status plants and weekly ~~site~~ monitoring of the protective fencing along fencing along the buffer zone ~~by a qualified biologist to ensure that the special-status plants are being protected during site disturbance and construction~~.*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Where individuals would be potentially affected directly by site disturbance and transplantation of individual plants is required to minimize and mitigate for impacts to such species, the following shall be integrated into the HMP: • *remove bulbs of individual plants to be directly impacted during the dormant season;* • *relocate the bulbs to a site with similar soil, hydrologic, vegetation type and aspect as the portion of the project site where the plants are found; and* • *identify the location(s) for dormant season relocation and site selection for transplantation.* *The HMP would also include a requirement to meet the following criteria:* • *metrics of successful establishment, which would include a minimum of 80 percent survival of the transplants after two years of transplanting the species.* *If the 80 percent survival is not established after two years, transplants of individuals grown from seed shall be planted at a location with similar soil, hydrologic, vegetation type and aspect as the portion of the site where they are found. Transplantation shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		have commenced. Transplants shall be monitored every month for the first six months, then every two months for a minimum of two years. After two summer seasons of monitoring identifies successful establishment of 50 percent of the initial transplants, transplant seedlings will be deemed successful.	
4.4-2 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status wildlife species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	S	*Western Pond Turtle* *4.4-2(b) Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults. If the pre-construction survey does not detect western pond turtle, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species. Work in the area shall cease and fencing or other protective measures shall be employed to excluded and prevent access to the area until the identified turtle has cleared the area.*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		If a nest is documented during pre-construction surveys, a non-disturbance buffer shall be established, as determined by a qualified biologist, based on the location of the nest until all eggs have hatched and the juveniles have dispersed out of the proposed impact area. *Watercourse/Wetlands/Riparian Areas Management Plans. The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial Industrial Site and Brunswick Area, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control.* *California Black Rail* *4.4-2(d) Pre-construction Survey and Avoidance and Minimization Measures. Pre-construction surveys for California black rail shall be conducted by a qualified biologist prior to the implementation of any ground disturbance within or directly adjacent to any perennial marsh and wet meadow habitat within the Centennial and Brunswick Industrial Sites. The pre-construction surveys for this species shall occur no more than fourteen (14) days prior to any such disturbance within or directly adjacent to the species*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		habitat. The pre-construction surveys shall include conducting call back/response surveys. This species is most active between two hours before and three hours after sunrise; therefore, surveys shall start at sunrise and continue no later than 0930. If evening surveys are to be conducted, they shall be paired with a morning survey, and all sites shall have surveys conducted at both time periods. The preferred method for conducting surveys via the call-back/response protocol of Evens et al (1991). If the pre-construction survey does not detect evidence of California black rail, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a positive call back is identified during the surveys, then the species is assumed to be present and the area shall be avoided from disturbance in order to avoid impacts to individuals of the species, if feasible. *Given the species is a CESA listed species, coordination with CDFW shall occur if a positive response to the call-back/response surveys occurs and if any proposed disturbance may impact the species. Any area containing this species would likely need to be avoided in order to avoid impacts to and take of this species, if feasible, or additional mitigation measures would be required in coordination with CDFW to minimize and avoid impacts to such species. Additional avoidance measures could include, but may not be limited to the following: environmental awareness training, daily*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		construction monitoring by a CDFW qualified biologist when disturbance related activities occur within or directly adjacent to the species habitat, and exclusionary fencing installation between the species habitat and the proposed disturbance areas. ~~Additionally, an ITP could be required by CDFW if complete avoidance of the species is not feasible.~~ Areas where no positive response to the call-back/response surveys are assumed to not contain individuals of the species and therefore, disturbance in those areas would have no impact on this species. *<u>Watercourse/Wetlands/Riparian Areas Management Plans.</u> The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial and Brunswick Industrial Sites, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control.* *Coast Horned Lizard* *4.4-2(e) <u>Pre-construction Survey and Avoidance and Minimization Measures.</u> A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance within the areas of the Centennial and Brunswick Industrial*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Sites that contain disturbed or developed surfaces and annual grassland vegetation community. If the pre-construction survey does not show evidence of coast horned lizard, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. *If the species is documented during pre-construction survey(s), a qualified wildlife biologist (approved by CDFW) shall move individual coast horned lizards outside of the proposed disturbance area(s) in order to avoid an impact to this species. The qualified biologist shall have all required permits before commencing species specific surveys. Once the coast horned lizard(s) have been removed from the disturbance area(s) and out of harm's way, the proposed work would no longer pose a risk to individuals of the species.* *Special-Status Bats* *4.4-2(f)* *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction bat roosting survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance of any structures or riparian and forested woodlands within the Centennial Industrial Site and Brunswick Area to identify the presence or absence of roosting bats. If the pre-construction survey does not show evidence of roosting bats, a letter report documenting the results of the survey shall be*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		provided to the Nevada County Planning Department, and additional measures are not required. *If any Townsend's big-eared bats (or any other species of bat, including the hoary and pallid bat) are identified during roosting surveys, passive removal of the roosting bats prior to disturbance to structures and riparian and forested woodlands shall be implemented to avoid impacts to this species. Passive removal includes allowing roosting bats to freely leave the roost site (riparian and forested woodlands and any structure). Once the roosting bats have been passively removed from the structure(s) and riparian and forested woodlands, the structure(s) would be closed off from recurring bat roosting within the structure(s) and the proposed work within the structure(s) would no longer pose a risk to individuals of the species. For riparian and forested woodlands containing bat roosts, the removal of trees associated with such woodlands would only occur once the bats leave the day roosts. Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until a qualified bat biologist has determined the young bats are no longer roosting and the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in.* *~~Non-Special Status Raptors and Migratory~~ Nesting Birds* *4.4-2(g)* Pre-construction Survey and Avoidance and Minimization Measures. Prior to initiation of ground-	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		disturbing activities for any phase of project construction, if construction is expected to occur during the raptor nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal, including one daytime survey and one nighttime survey targeted at a California spotted owl, consistent with the USFWS (1992) California spotted owl survey protocol. The pre-construction survey shall be conducted within 7 days prior to commencement of ground-disturbing activities. The survey shall be conducted within all areas of proposed disturbance and all accessible areas within 250 feet of proposed disturbance. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required. Removal of any trees within the Brunswick Area would occur between September 1st and January 31st to ensure that no nesting birds, raptors, or owls would be impacted by the proposed IMM project. *If any active nests are located within the proposed disturbance area, including active nests within riparian habitat for the yellow-breasted chat, willow flycatcher, yellow warbler, and olive-sided flycatcher, an appropriate buffer zone shall be established*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures		Level of Significance After Mitigation
			around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically 100 feet for migratory bird nests and 500 feet for raptor nests. If active nests are found within the disturbance footprint, a qualified biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical <u>and/or the willow flycatcher, a State listed species, is documented nesting during the pre-construction surveys for nesting birds. Additionally, an ITP could be required by CDFW if complete avoidance of willow flycatcher is not feasible</u>. If construction activities cause the nesting bird(s) to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased, as determined by the qualified biologist, such that activities are far enough from the nest to stop the agitated behavior. The exclusionary buffer shall remain in place until the young have fledged or as otherwise determined by a qualified biologist.	
4.4-3 Have a substantial adverse effect on riparian habitat or other sensitive natural community, or State or Federally protected wetlands (including, but not limited to,	S	*4.4-3(c)*	*To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Prior to initiation of ground-disturbing activities, a Section 404*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.		*permit for fill of any jurisdictional wetlands within the Centennial Industrial Site and Brunswick Area shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the Corps "no-net-loss" policy, be provided at a minimum 1:1 ratio and be based on the final impact acreages verified by the Corps. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines. Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.* *The applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Nevada County Planning Department.* *4.4-3(d) Prior to initiating of ground disturbing activities within the non-disturbance buffers for aquatic resources on the Centennial Industrial Site and Brunswick Area, the applicant shall apply for a Section 1600 Lake or Streambed Alteration Agreement from CDFW. Impacts to CDFW 1600 jurisdictional areas shall be outlined in the application and are expected to be in substantial conformance with the impacts to biological resources outlined in this EIR (see Tables*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		4.4-9 through 4.4-11). Impacts for each activity shall be broken down by temporary and permanent, and a description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent. Minimization and avoidance measures within jurisdictional areas shall be proposed as appropriate and may include: preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas immediately adjacent to riparian areas with native seed, and installation of project-specific storm water BMPs. Mitigation may include restoration or enhancement of jurisdictional resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, off-site or on-site conservation easements, working with a local land trust to preserve aquatic or riparian areas, or any other method acceptable to CDFW. Mitigation shall be provided at a minimum 1:1 ratio. *A site revegetation plan would be required to be developed and approved by CDFW as part of a Streambed Alteration Agreement permit condition and native trees planned for removal with a diameter at breast height of 4 inches or greater would need to be mitigated for through planting of native riparian trees within adjacent stream zones not being impacted by the Idaho-Maryland Mine Project, with clear success criteria identified, monitoring and reporting required, and corrective actions to be taken*	



Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		if mitigation measures do not meet the proposed success criteria. *Written verification of the Section 1600 Lake or Streambed Alteration Agreement shall be submitted to the Nevada County Planning Department.*	
4.5 Cultural and Tribal Cultural Resources			
4.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5.	S	*4.5-1(a)* ~~*Following initial mine dewatering, and p*~~*Prior to* ~~*commencement of underground mining*~~ *issuance of building permits, the project applicant shall share the historical documentation of the Idaho-Maryland Mine Company in their possession with the public through one of the following libraries: the California State Library, the California Geology and Mining Library, or the Searls Library. The library shall consist of the following information:* • *Surface Maps (5 maps) – Approx. year at 1956, Showing topography, buildings, roads, exploration trenches and drill holes, underground workings at surface, and geology;* • *103 Level Maps (103 maps) – Approx. year 1942, Showing mine tunnels, raises and shafts, survey stations, geology, and drill holes;* • *Mine Geology Maps (61 maps) – Approx. year 1956, Showing geology on tunnels driven post WW2;* • *Mine Stoping Maps (219 Maps) – Approx. year 1956, Showing mine stoping;*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• *Operation Reports 1919 to 1924 and 1926 to 1935, Providing monthly or annual reports on underground exploration and mine development;* • *Monthly Development Reports – 1936 to 1956, Providing monthly reports on mine development;* • *Geological Summary Reports – 1936 to 1942, Providing monthly reports on underground exploration;* • *Underground Geology Photos – Collection of photos from 1940's of underground tunnels and geology; and* • *A digital mine model, including a 2D and 3D digitization of historic mine tunnels available in AutoCAD dwg and dxf formats.* *Proof of submittal to one of the above-listed libraries shall be provided to the Nevada County Planning Department.*	
		4.5-1(b) *Following initial mine dewatering, and prior to commencement of underground mining, the project applicant shall retain a qualified historian meeting the Secretary of the Interior's standards, to perform a historical study of the underground mine workings in the areas deemed safe by a certified mining geologist. The historical study shall include but not be limited to an evaluation of the underground work environment, engineering, equipment, and practices, to the maximum extent feasible. The historical study*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures		Level of Significance After Mitigation
			shall be deposited at the same library selected in Mitigation Measure 4.5-1(a) and submitted to the Nevada County Planning Department.	
4.8 Hydrology and Water Quality				
4.8-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	S	*4.8-1(a)*	*The applicant shall submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-~~2016-0076~~ 2022-0006; NPDES No. CAG995002), at least six months prior to construction of the water treatment system; and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin and provided to Nevada County Planning Department. The NOI shall include evaluation of potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1,2-DCE, and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals identified in the Limited Threat Discharge Order. Upon construction of the WTP, sampling shall be provided to the RWQCB demonstrating that the treated water meets the water quality standards and treatment goals specified in the Order. Ongoing monitoring of treated water shall occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek. The owner shall be required to submit quarterly monitoring reports to the State Regional Water Quality Control Board, demonstrating compliance with the maximum daily effluent*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		limitations specified in Section V of the NPDES permit. The applicant shall submit to the County a copy of the NOI and evidence of the applicant's receipt of the NOA specified above prior to initial mine dewatering. The applicant shall submit copies of sampling and monitoring reports to the County at the time such reports are submitted to the RWQCB. *The applicant shall also submit a Report of Waste Discharge (RoWD) and obtain Waste Discharge Requirements (WDRs) for use of the surface impoundment (i.e., Brunswick clay-lined pond) in the mine water treatment process. At a minimum, the liner of the clay-lined surface impoundment shall be upgraded to include a synthetic liner meeting the specifications in Title 27, Section 22490(f), of the California Code of Regulations. Prior to initial mine dewatering, the applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs, as well as evidence of the completion of modifications to the clay-lined pond in compliance with the requirements.* *4.8-1(e) The applicant shall submit a RoWD and obtain WDRs from the Central Valley RWQCB for construction of the engineered fill areas. The WDR permit shall be received by the applicant prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites. Proof of coverage shall be provided to the Nevada County Public Works Department. As part of this process, the RWQCB will*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		determine the appropriate mining waste classification for the proposed engineered fill, and will consider the following factors: (1) whether the waste contains hazardous constituents only at low concentrations; (2) whether the waste has no or low acid generating potential; and (3) whether, because of its intrinsic properties, the waste is readily containable by less stringent measures. The engineered fill areas shall be constructed in accordance with the Title 27 specifications, pursuant to the mining waste classification determined by the RWQCB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the placement of fill or fill site preparation disturbance at the Brunswick Industrial Site and Centennial Industrial Site. The RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant will prepare and implement a Waste Characterization Plan (Characterization Plan) which will be incorporated into the approved WDR. The purpose of	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures		Level of Significance After Mitigation
			the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes will be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e. sites other than the applicants Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization will be established in the approved WDR.	
4.8-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	S	*4.8-2(a)*	*The project applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County. Implementation of the GMP shall be initiated prior to the dewatering of the mine and on an ongoing basis. Pursuant to the GMP, a network of monitoring wells shall be installed to the satisfaction of the Nevada County Environmental Health Department. Prior to construction of any monitoring wells within the County or City right-of-way, the applicant shall obtain an encroachment permit from the Public Works Department of the respective agency. Groundwater-level and groundwater quality information shall be obtained from the project*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department, and used to generate the following information: *1) Water-level and groundwater quality monitoring data for a minimum of 12 months before commencement of dewatering of the mine.* *2) Water-level hydrographs for each well showing the water-level variations over the monitoring period and a comprehensive well hydrograph showing long-term water levels for each well over the entire monitoring period.* *3) Potentiometric-surface contour maps showing the groundwater elevations across the site. These may be produced for a subset of the shallow wells and a second subset for the deeper wells if it is judged that the shallow and deep well systems are in separate water-bearing zones. Alternatively, a combined potentiometric map that includes both shallow and deep well pairs may be constructed if it is judged that the shallow and deep wells are installed within the same water-bearing zone.* *4) A projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings. *4.8-2(c) Prior to commencement of initial mine dewatering, the project applicant shall implement the Well Mitigation Plan (February 2, 2021, Rise Grass Valley, Inc.) by connecting 30 properties in the East Bennett area to the NID potable water system (see Figure 1 and Table 1 of the Well Mitigation Plan for specific property locations). The project applicant shall be responsible for fully funding the following for each property connection:* *1) Engineering and Permitting <u>to NID and County standards</u>.* *2) Construction of main water piping, <u>interconnecting the existing NID pipelines at E. Bennet Road and Whispering Pines Lane in accordance with NID standards and NID approved engineering design.</u>*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		3) Construction of service lateral piping in accordance with NID standards and NID approved engineering design. *4) Installation of water meters at property line in accordance with NID standards and NID approved engineering design.* *5) Connection of water meters to house (If requested and authorized by property owner)* *6) Closure of domestic water wells (If requested and authorized by property owner)* *7) NID installation and capacity charges for a 5/8-inch meter connection.* *8) Reimbursement for water charges, for monthly fixed service charges and use of up to 400 gallons per day, will continue until the sooner of the following occurs: 1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise. 2) The property is annexed into the City of Grass Valley.* *9) Of the 30 properties, it is anticipated that only APN 009-600-012 is not eligible for water cost reimbursement as it is currently vacant. Existing NID customers will not be eligible for reimbursement of NID water charges and will be confirmed through consultation with NID during the design process.* *10) All easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the applicant and conveyed to NID prior to acceptance of the new potable line.*	

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Proof of satisfaction of this measure shall be provided to Nevada County Environmental Health Department for each property identified in the Well Mitigation Plan.	
4.8-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: **i) Result in substantial erosion or siltation on- or off-site?** **ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?** **iii) Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional**	S	*4.8-3* *As part of the Improvement Plan submittal process, the applicant shall submit a Final Drainage Report to the Nevada County Planning and Public Works Departments for review and approval. The Final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity. The report shall address the Centennial and Brunswick Industrial Sites, be prepared by a Registered Civil Engineer, and shall, at a minimum, include: narrative describing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements to accommodate flows from this project, including treated mine water discharge and stormwater runoff. The Final Drainage Report shall demonstrate that the on-site storm drain systems are sized such that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed pre-development levels in the downstream channel(s) during the design storm events.*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
sources of polluted runoff? **iv) Impede or redirect flood flows?**			
4.10 Noise and Vibration			
4.10-4 Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	S	*4.10-4* *The project applicant shall conduct a project-specific Ground Vibration Monitoring Program, as set forth in this mitigation measure. As part of the Ground Vibration Monitoring Program, the mine shall employ between eight and ten seismographs, which shall be installed prior to any onsite blasting, and used during all blasting of levels above the 1,000-foot level. The seismographs shall be placed at the following locations:* • *One at the Brunswick Shaft;* • *One at each of the four corners of the Mine Property;* • *One in the Whispering Pines Industrial Park;* • *Two at nearby residences; and* • *Two travelling seismographs which can change location depending on the weekly/monthly mining plan.* *After the mine has stopped blasting at the proposed shaft and above the 1,000-foot level, only five seismographs would be required for the Ground Vibration Monitoring Program. One seismograph shall be located at the Brunswick Shaft and one in each of the four corners of the mine property. The five*	LS

Table 2-1
Summary of Impacts and Mitigation Measures

Impact	Level of Significance Prior to Mitigation	Mitigation Measures		Level of Significance After Mitigation
			seismographs would collect relevant data throughout the entire operation to understand how the ground is transmitting vibration in these areas. *Once mining operations commence, the project applicant shall hire a blast consultant to assist with the development of a 95 percent confidence level equation for the site-specific ground vibration. The blast consultant would take the data acquired by the seismographs set-up on the mine, run a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain below 0.4 in/s at sensitive receptors.* *Results of the Ground Vibration Monitoring Program and the equation for site-specific ground vibration shall be submitted to the Nevada County Planning Department, on a monthly basis, for review.*	
4.12-6 Substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	S	*4.12-6(b)*	*Prior to ~~commencement of engineered fill~~ any hauling of project materials (e.g., engineered fill, soil, rocks, etc.) on County or City roads, the project applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between project driveway and Brunswick Road.*	LS

Page 3-20, DEIR Chapter 3, Section 3.7, the following applicant proposed measures (APMs) are hereby incorporated under the Aboveground Facilities Construction and Operations header:

APM-AQ-1: Exhaust Emission Controls

The following measures, required as project conditions of approval, shall be implemented during construction, operation, and reclamation to reduce exhaust emissions:

- All off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines.
- Unnecessary construction vehicle idling time shall be minimized. The ability to limit construction vehicle idling time is dependent on the sequence of activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for immediate use. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project shall apply a "common sense" approach to vehicle use such that idling is reduced as much as possible below the maximum of 5 consecutive minutes required by regulation (13 CCR 2449 and 2485). If a vehicle is not required for use immediately or continuously for activities or for other safety-related reasons, its engine shall be shut off.
- All off-road equipment shall be maintained in accordance with manufacturer's specifications. All equipment shall be checked by a qualified mechanic, and equipment shall be confirmed that it is in proper condition prior to operation.

APM-AQ-2: Surface Fugitive Dust Controls

The following measures, required as project conditions of approval, shall be implemented to reduce surface fugitive dust emissions:

- During construction, operation, and reclamation, all exposed soil surfaces (e.g., unpaved disturbed areas, unpaved parking areas, and unpaved staging areas, and soil piles) shall be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring. As an alternative to watering, inactive soil piles shall be covered to minimize wind erosion.
- During construction, all on-site roadways shall be paved as soon as possible after grading and any unpaved gravel roads shall be treated with chemical stabilizers in order to control fugitive dust.

Page 3-29, DEIR Chapter 3, Section 3.7, fifth paragraph is hereby revised as follows:

> The applicant will be required as part of the project to submit a Report of Waste Discharge (RoWD) and obtain Waste Discharge Requirements (WDRs) from the Regional Water Quality Control Board (RWQCB) for construction of the engineered fill areas~~, as the engineered fill would be considered a Group C mining waste~~.[3] Percolation of precipitation into the fill areas is expected to be minimal because the engineered fill would be graded and compacted to allow runoff to be conveyed to the detention basins. The WDRs would specify appropriate monitoring and limitations to prevent the discharge of water containing any constituents outside of applicable water quality standards.

Page 3-52, DEIR Chapter 3, Section 3.8, fifth row of Table 3-11 is hereby revised as follows:

State Water Resources Control Board ~~Division of Water Rights~~	401 (Water Quality) Certification (Clean Water Act, 33 USC 1251: if the project requires Army Corps of Engineers 404 permit)	Discharge into "water of the United States" including wetlands
	General Industrial Activity Stormwater Permit. Notice of Intent (40 CFR Part 122)	Stormwater discharges associated with industrial activity, unless covered by individual NPDES Permit
	Spill Prevention Control and Countermeasures Plan (Health and Safety Code 25270 et seq.; 40 CFR Part 122)	Underground storage of petroleum of 42,000+ gallons. Above ground storage with 10,000+ gallons; or any spill affecting surface waters, single tank of 600 gallons, or 1,320 total

The revisions to Chapter 3, Project Description, do not change the conclusions of the analysis in the DEIR.

4.3 Air Quality, Greenhouse Gas Emissions, and Energy

Page 4.3-11, DEIR Chapter 4.3, Section 4.3.2, first paragraph under the Sensitive Receptors heading is hereby revised as follows:

> Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Children, pregnant women, older adults, and people with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses where sensitive-receptor population groups are likely to be located such as hospitals, schools, childcare centers, residences, and retirement homes, are considered especially vulnerable. Recreational parks and uses are also areas that may have sensitive receptor visitors.

Page 4.3-61, DEIR Chapter 4.3, Section 4.3.4, the final paragraph is hereby revised as follows:

> The TAC emissions associated with blasting and crushing, ore processing, and earthwork and material handling would include asbestos and silica emitted from the fugitive dust produced. The applicant estimates that the ore processed would be quartz veins hosted primarily within andesite rock and an assumed 60 percent silica content. The applicant has prepared an Asbestos, Serpentinite, and Ultramafic Rock Management Plan (ASUR Plan) which is designed to ~~exclude~~ minimize asbestos containing material, serpentinite, or ultramafic rock from the engineered fill produced as part of the project (see Appendix E.2).[35]

Page 4.3-73, DEIR Chapter 4.3, Section 4.3.4, first and second paragraphs under the Mitigation Measure(s) subheading are hereby revised as follows:

> ### Mitigation Measure(s)
> The emission data presented in Table 4.3-17 (i.e., unmitigated emissions) reflect the reductions that would occur without implementation of APM-AQ-1 and APM-AQ-2. Table 4.3-19 shows the estimated maximum daily mitigated emissions associated with construction, operation, and reclamation of the project, accounting for additional emissions reductions associated with Mitigation Measure 4.3-1(b), which would result in a reduction in construction contractors' equipment exhaust criteria air pollutants during project construction (year 2021).[39] Additional reductions could not be quantified for Mitigation Measure 4.3-1(a), which are the NSAQMD recommended mitigation measures that are applicable to the project.

According to the NSAQMD, implementation of recommended mitigation measures for Level A and B thresholds (included as Mitigation Measure 4.3-1[~~b~~a] below) would reduce project impacts to a *less-than-significant* level during all years of project construction, operations, and reclamation.[40]

Page 4.3-77, DEIR Chapter 4.3, Section 4.3.4, Mitigation Measure 4.3-1(b) is hereby revised as follows:

4.3-1(b) ***Construction Exhaust Emissions Minimization Plan.***
Prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The Construction Exhaust Emissions Minimization Plan shall detail project compliance with the following requirements:

- *Where access to alternative sources of power and alternative-fueled equipment are available, portable diesel engines shall be prohibited.*
- *All diesel-powered equipment with engines equal to or greater than 50 horsepower (hp) shall be powered by California Air Resources Board (CARB) certified Tier 4 Final engines. If 50 hp or greater engines that comply with Tier 4 Final emissions standards are not commercially available, then the project applicant shall ensure that all diesel-powered equipment equal to or greater than 25 hp shall have at least CARB-certified Tier 3 engines with the most effective Verified Diesel Emission Control Strategies available for the engine type, such as Level 3 Diesel Particulate Filters (Tier 4 engines automatically meet this requirement).*

    a. *For purposes of this mitigation measure, "commercially available" shall mean the availability of the Tier 4 Final equipment~~, taking into consideration factors such as critical path timing of construction and geographic proximity of the equipment location to the project sites~~.*
    b. *The project applicant shall maintain and submit records to Nevada County concerning its efforts to comply with this requirement.*

Page 4.3-80, DEIR Chapter 4.3, Section 4.3.4, final paragraph and footnote 41 are hereby revised as follows:

With regard to potential asbestos emissions from mining, Rise Grass Valley Inc. would be required to comply with applicable regulations, including those established by the MSHA and CARB, that limit potential exposure for workers. Further, as described in APM-AQ-3, the project would include implementation of an ASUR Plan that has been designed to minimize asbestos in the engineered fill produced by the project, as well as asbestos fibers generated from underground mining exhausting to the surface. Finally, pursuant to the CARB ATCM for Construction, Grading, Quarrying and Surface Mining Operations, an ADMP is required to be submitted to the NSAQMD for any project with greater than one acre of surface disturbance if any portion of the area to be disturbed is mapped as having serpentine or ultramafic rock or if any portion of the area to be disturbed has naturally-occurring asbestos, serpentine or ultramafic rock as determined by the owner/operator or the Air Pollution Control Officer. Because asbestos was found to be present in some of the

~~underground mining~~ material samples that Rise Grass Valley Inc. sent for laboratory analysis,[41] an ADMP is required to be implemented to reduce potential asbestos exposure and protect public health.

[41] ~~Samples containing naturally-occurring asbestos were from underground rock only; naturally-occurring asbestos is not known to outcrop at the surface of the Brunswick Indutrial Site or Centennial Industrial Site.~~

Page 4.3-83, DEIR Chapter 4.3, Section 4.3.4, the second and third bullet points of Mitigation Measure 4.3-2 are hereby revised as follows:

4.3-2 ***Asbestos Dust Mitigation Plan.***
Prior to the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The provisions of the ADMP shall be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 of the California Code of Regulations [CCR] Section 93105) contains specific requirements for the preparation of an ADMP. Conditions of the ADMP shall include the following:

- *Provisions of this ADMP shall apply throughout construction, operation, and reclamation activities, except as specified otherwise.*
- *All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device. Sweeping or vacuuming on public roads shall be conducted so as to avoid peak AM and PM traffic hours.*
- *A gravel pad designed and maintained to effectively clean tires of exiting vehicles, or a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project.*

Page 4.3-87, DEIR Chapter 4.3, Section 4.3.4, a new paragraph is added before the third paragraph, which is also hereby revised as follows:

In addition to reducing air quality and GHG emissions, APM-AQ-1, Exhaust Emission Controls, would serve to avoid inefficient energy consumption in several ways. First, APM-AQ-1 commits the project applicant to using Tier 4 Final equipment throughout project construction, operation, and reclamation. The commitment to the use of Tier 4 engines is further required by Mitigation Measure 4.3-1(b) of this EIR. As a result of the improvements integrated into Tier 4 Final engines (relative to lower tier engines), Tier 4 Final compliant engines are generally the most fuel-efficient models currently available. Consequently, by using Tier 4 compliant engines throughout the construction, operation, and reclamation processes, fuel use by off-road equipment would be minimized, and the off-road equipment used in project implementation would not be inefficient.

As a further means of increasing the efficiency of fuel use associated with project implementation, APM-AQ-1 includes measures to minimize vehicle idling where practical. In general, reducing idling reduces the amount of run-time for engines, which decreases

the amount of fuel consumed. Reducing idling time would, therefore, avoid inefficient energy consumption related to off-road vehicle use. Similarly, maintaining equipment in accordance with manufacturer's specifications, as required by APM-AQ-1, ensures that equipment continues to operate efficiently.

Projected fuel use during construction is approximately 161,700 gallons of diesel and 21,488 gallons of gasoline. Projected petroleum use during operation of the project averages to 222,375 gallons per year (165,182 gal/year (diesel) + 57,192 gal/year (gasoline)) over the estimated 11-year period during which engineered fill would be transported by truck to the Centennial and Brunswick Industrial Sites. For the remainder of the life of the project, during which engineered fill is transported longer distances to market, projected annual petroleum use is 403,208 gallons (357,742 gal/year (diesel) + 45,468 gal/year (gasoline)).

In addition to the energy efficiency requirements focused on reducing fuel consumption discussed above, construction and operations would also require operation of electrically powered equipment. Total energy demand during construction is estimated at 16,513 megawatt-hours. Total annual energy demand (PG&E supplied) for the operational lifetime of the project is estimated at 49,613 megawatt-hours. Use of grid-supplied electricity provides an opportunity for the use of renewably generated electricity to power project operations. Unlike fossil-fueled equipment, electric equipment may receive electrical power from sources such as solar, hydro-electric, wind, or biomass, which are sustainable and renewable. The electricity provider for the project area, PG&E, currently utilizes a variety of renewable energy sources to provide electricity to the grid. Thus, use of electrically powered equipment would reduce the project's dependence on fossil-fuel energy supplies and would not be considered an inefficient source of energy demand. Although electricity demand for the project would primarily be met through grid-supplied electricity, in certain instances, such as during power outages or emergency electrical shut-offs, the use of emergency generators would be necessary to provide continued electrical power. Despite the emergency generators being diesel fueled, both of the generators used during project construction and all four of the generators used during project operations, if needed, would be Tier 4 Final engines. As discussed above, Tier 4 Final engines are the most efficient engines currently available, which would ensure that the consumption of fuel by the generators would be minimized to the extent feasible. Moreover, the generators would be used to provide continued operations to critical mining infrastructure such as pumps, locomotives, and ventilation systems, which are critical to the safety of miners and efficient operation of the mine. Thus, the use of electrically powered equipment would not result in the inefficient or wasteful consumption of energy.

Pages 4.3-96 through 4.3-99, DEIR Chapter 4.3, Section 4.3.4, Mitigation Measure 4.37(b) is hereby revised as follows:

4.3-7(b) ***Carbon Offsets – Construction Emissions.***
Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100 metric ton carbon dioxide equivalent (MT CO_2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling ~~2,664~~ 2,345 MT CO_2e, which was calculated by subtracting 1,100 MT CO_2e (threshold) from the construction emissions generated by the project.

Carbon Offset Standards – Eligible Registries, Acceptable Protocols and Defined Terms:
"Carbon offset" shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard). This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities within the Nevada County region. The Project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols. Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the "Reporting and Enforcement Standards" below is submitted to the County demonstrating that each registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies:

i) Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and
ii) Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:

a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;
b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties;
c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,
d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time.
e. Be approved by the California Air Resources Board, and be compliant with 17 CCR § 95972 and AB 32 (the California Global Warming Solutions Act of 2006) to the extent applicable to voluntary offsets.

Further, any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past ~~or forecasted~~ reduction or sequestration of one MT of CO_2e that is "not otherwise required" (CEQA Guidelines Section 15126.4[c][3]). Each carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows:

i) *"Additional" means that the carbon offset is ~~not~~ in addition to: (1) any greenhouse gas emission reduction otherwise required by law or regulation~~,~~; ~~and not~~ (2) any other GHG emissions reduction that otherwise would occur; and (3) is consistent with Health and Safety Code Section 38562(d)(2);*

ii) *"Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity-shifting leakage and market-shifting leakage;*

iii) *"Verifiable" means that the GHG reduction underlying the carbon offset is well documented, transparent and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI);*

iv) *"Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction;*

v) *"Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage; and*

vi) *"Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.*

The protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below ensure that the emissions reductions required by this mitigation measure are enforceable against Rise, as the County has authority to hold Rise accountable and to take appropriate corrective action if the County determines that any carbon offsets do not comply with the requirements set forth in this mitigation measure.

The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program).

Additionally, the County shall require that all carbon offsets purchased by the Project applicant shall originate from inside the state of California.

Reporting and Enforcement Standards:
Prior to issuance of requested grading permits, Rise shall submit a report to the County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to

achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the report shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offsets to be retired, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and information sufficient for the County to verify that the purchased offsets meet the requirements identified within this mitigation.

To ensure consistent and effective enforcement of this mitigation measure and to assist the County with its review of the report described above, an implementation process timeline and associated flow chart for the implementation and administration of this mitigation measure's requirements has been prepared and is attached as Appendix F to the FEIR.

If the County determines that the project's carbon offsets do meet the requirements of this mitigation measure, the offsets can be used to reduce project GHG emissions and project permits shall be issued. If the County determines that the project's carbon offsets do not meet the requirements of this mitigation measure, the offsets cannot be used to reduce project GHG emissions and project permits shall not be issued. Additionally, the County may issue a notice of non-consistency and cease permitting activities in the event that the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until Rise has demonstrated that the previously provided carbon offsets are compliant with the standards herein or have provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction. In the event that the project is out of compliance with this Mitigation Measure and fails to demonstrate compliance after receiving notice of said violation, the County shall have authority to impose administrative penalties, take legal action to force compliance, or to start proceedings to suspend or revoke the Project's permits.

The foregoing revisions to Chapter 4.3, Air Quality, Greenhouse Gas Emissions, and Energy, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

4.4 Biological Resources

Page 4.4-9, DEIR Chapter 4.4, Section 4.4.2, the final paragraph is hereby revised as follows:

> The montane riparian in the placer diggings and areas created from earth movement are characterized by ~~black~~ Fremont cottonwood (P*opulus* ~~*tremuloides*~~ *fremontii* ssp. *fremontii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), and occasionally ponderosa

pine in the overstory. Dense thickets are often resultant with Himalayan blackberry and Baltic rush (*Juncus balticus* ssp. *atar)* in the herbaceous layer.

Page 4.4-10, DEIR Chapter 4.4, Section 4.4.2, the second paragraph is hereby revised as follows:

The montane riparian vegetation along both sides of the South Fork Wolf Creek is dominated by white alder (*Alnus rhombifolia*), red willow (*Salix laevigata*), and arroyo willow (*Salix lasiolepis*), with other overstory species from adjacent vegetation types, including California black oak, Ponderosa pine and Douglas fir. The understory of montane riparian along the stream is dominated by Himalayan blackberry. This vegetation type forms a very narrow band along both sides of the creek between the mapped montane conifer-hardwood and annual grassland and wet meadow vegetation communities.

Page 4.4-20, DEIR Chapter 4.4, Section 4.4.2, fifth row of Table 4.4-5 is hereby revised as follows to include a discussion on Pine Hill flannelbush:

Pine Hill flannelbush *Fremontodendron decumbens*	FE/CR/1B.2	Chaparral, cismontane woodland on serpentinite and gabbroic substrates, from 1,390 – 2,495 feet.	Apr-July	**Centennial Industrial Site** **~~High~~ Present.** ~~Potential for occurrence in~~ Species identified within openings and under chaparral in gabbroic soils in Idaho Maryland study area. Known from CNDDB Occurrence #14. Protocol level field surveys in 2019 expanded boundaries of known occurrence. **Brunswick Area** **Low.** Known from two miles to the north. Gabbroic soils not present in study area. Was not observed during 2019 protocol level field surveys.

Page 4.4-32, DEIR Chapter 4.4, Section 4.4.2, fifth row of Table 4.4-6 is hereby revised as follows to include a discussion on foothill yellow-legged frog:

Foothill yellow-legged frog *Rana boylii*	SCT/S~~T~~CC	Perennial rocky (pebble or cobble) streams with cool, clear water in a variety of habitats from valley and foothill oak woodland, riparian forest, ponderosa pine, mixed conifer, coastal scrub, and mixed chaparral at elevations ranging from 0 to 6,370 feet. Occurs in the Klamath, Cascade, north Coast, south Coast, and Transverse Ranges; through the Sierra Nevada foothills up to approximately 6,000 feet south to Kern County.	**Centennial Industrial Site** **Very Low**. However, the main stem of Wolf Creek within the northern section of the Centennial Industrial Site contains marginal suitable habitat for the species. **Brunswick Area** **Very Low**. However, the South Fork Wolf Creek within the western section of the Brunswick Industrial Site contains marginal suitable habitat for the species.

Page 4.4-34, DEIR Chapter 4.4, Section 4.4.2, fourth row of Table 4.4-6 is hereby revised as follows to include a discussion on California black rail:

California black rail Laterallus jamaicensis coturiculus	--/CT California Fully Protected	California black rail inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. The species requires water depths of approximately 1 inch that does not fluctuate during the year and dense vegetation for nesting habitat.	**Centennial Industrial Site** **Very Low**. However, the perennial aquatic resources, such as the freshwater emergent marsh habitats within the eastern section of the Centennial Industrial Site, should some portion remain after remediation, contain marginal suitable habitat for the species. **Brunswick Area** **Very Low**. However, the perennial aquatic resources such as the freshwater emergent marsh habitats within the Brunswick Industrial Site contain marginal suitable habitat for the species.

Page 4.4-34, DEIR Chapter 4.4, Section 4.4.2, Table 4.4-6 is hereby revised as follows to include discussions on olive-sided flycatcher, willow flycatcher, yellow-breasted chat, and yellow warbler:

Olive-sided flycatcher *Contopus cooperi*	--/SSC	Breeds in montane and northern coniferous forests, at forest edges and openings, such as meadows and ponds. Winters at forest edges and clearings where tall trees or snags are present. The nest is an open cup of twigs, rootlets, and lichens, placed out near tip of horizontal branch of a tree.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable habitat for the species.
Willow flycatcher *Empidonax traillii*	--/CE	Willow flycatcher males arrive first to the breeding grounds and establish territories. Males establish territories by singing on high perches. Females arrive later and settle onto a territory held by a male. Inhabits extensive thickets of low, dense willows on edge of wet meadows, ponds, or backwaters. Low, exposed branches are used for singing posts and hunting perches.	**Centennial Industrial Site** **Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable foraging habitat for the species. Suitable nesting habitat absent. **Brunswick Area** **Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species along South Fork Wolf Creek adjacent to open wet meadows. No impacts to

			riparian habitat are proposed.
Yellow-breasted chat *Icteria virens*	--/SSC	Summer resident and inhabits riparian thickets of willow and other brushy tangles near waterways. Nests in low, dense riparian habitat consisting of willow and blackberry as well as wild grape. Tends to nest within 10 feet of the ground.	**Centennial Industrial Site Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species.
Yellow warbler *Setophaga petechia*	--/SSC	Occurs principally as a migrant and summer resident from late March through early October; breeds from April to late July. Inhabits riparian thickets of willow and other brushy tangles near waterways. Nests in dense riparian habitat consisting of willow and cottonwood.	**Centennial Industrial Site Low**. Centennial Industrial Site, should some portion remain after remediation, contains marginal suitable habitat for the species. **Brunswick Area Low**. Brunswick Industrial Site contains marginal suitable foraging and nesting habitat for the species.

Page 4.4-34, DEIR Chapter 4.4, Section 4.4.2, Table 4.4-6 is hereby revised as follows to include the discussion on California spotted owl:

California spotted owl *Strix occidentalis occidentalis*	--/SSC	California spotted owl inhabits older, closed canopy forests and forages for prey that require woody debris and understory vegetation for cover. The species nests in cavities of trees and snags.	**Centennial Industrial Site None**. Suitable habitat for the species is absent. **Brunswick Area Moderate potential for CSO nesting, and High potential for transitory CSO**. Brunswick Industrial Site contains habitat within the southern section of the site. The species has been previously documented within that area along the border of the site with the neighboring parcel. Species documented in 2011, 2012, 2016, and 2018, but the species was not identified within the site during the surveys implemented in December 2018, early January 2019, July 2019, or August 2022. A nest has not been seen onsite since 2011. Further, the two protocol surveys conducted in 2022 did not identify any

			CSO onsite. Therefore, the potential for CSO nesting onsite is Moderate, while the potential for CSO that may be moving through the site or foraging onsite is High.

Page 4.4-35, DEIR Chapter 4.4, Section 4.4.2, Table 4.4-6 is hereby revised as follows to include the discussion on monarch butterfly:

Monarch butterfly *Danaus plexippus*	FC/--	Monarch butterfly has not been documented within the CNDDB within 5 miles of either the Centennial Industrial Site or Brunswick Area. Neither site contains many milkweed plants, the host plant for the species. This species is of a Federal Candidate for listing under the ESA.	**Centennial Industrial Site and Brunswick Area Low.** The species was not identified within either area during the surveys conducted in 2018, 2019, and 2022. Both sites contain very few and scattered milkweed plants. Anecdotal evidence shows the species to have been previously documented within the greater Grass Valley area. It is unlikely to occur in the Centennial Industrial Site or Brunswick Industrial Site.

Page 4.4-38, DEIR Chapter 4.4, Section 4.4.2, the California black rail subheading is hereby revised as follows:

California black rail (*Laterallus jamaicensis coturiculus*) – CA State Threatened and CA State Fully Protected

California black rail inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. The species requires water depths of approximately one inch that does not fluctuate during the year and dense vegetation for nesting habitat.

Page 4.4-39, DEIR Chapter 4.4, Section 4.4.2, the following discussion on riparian bird species is added after the discussion on California black rail:

Riparian Bird Species

Several species of birds are known to forage and nest within riparian habitat along stream corridors, including the willow flycatcher (*Empidonax traillii*), yellow warbler (*Setophaga petechia*), yellow-breasted chat (*Icteria virens*), and olive-sided flycatcher (*Contopus cooperi*). Yellow-breasted chat has been mapped within the CNDDB approximately 1.0 mile downstream of the Brunswick Area within the riparian habitat along South Fork Willow Creek. The willow flycatcher, yellow warbler, and olive-sided flycatcher have not been mapped within the CNDDB within 5 miles of the Brunswick Area or Centennial Area, but unprocessed data regarding their potential occurrence within the same vicinity as the yellow-breasted chat along the South Fork Wolf Creek downstream of the Brunswick Area is included in the Grass Valley Quad CNDDB search (CDFW 2022).

However, compared to the riparian habitat downstream of the Brunswick Area where the yellow-breasted chat has been mapped in the CNDDB (CDFW 2022), the riparian habitat within the Centennial and Brunswick Industrial Sites provide minimal suitable habitat for

any of these species given the level of disturbance historically within those areas as well as the recent disturbance within both areas in 2021 related to a fire that burned a large area within the Centennial Area and a large storm in late December 2021 that heavily impacted the riparian habitat along the South Fork Wolf Creek within the Brunswick Area. The previous mapped location of the yellow-breasted chat, as well as the locations of the other three riparian bird species included as unprocessed data within the CNDDB (CDFW 2022), are within the Empire Mine State Historic Park and have been identified in an area of substantially higher stream and riparian habitat quality than the more highly disturbed riparian habitat located along the South Fork Wolf Creek within Brunswick Area. Accordingly, these species have a low probability of occurrence onsite, and no potential impact is expected.

Page 4.4-39, DEIR Chapter 4.4, Section 4.4.2, the following discussion on California spotted owl is added after the discussion on California black rail:

California Spotted Owl (*Strix occidentalis occidentalis*) – CA State Species of Concern

California spotted owl have been previously identified within five miles of the Centennial Industrial Site and Brunswick Area, including a location potentially within the border area of the southwestern section of the Brunswick Area and adjacent to the Empire State Historic Park border (CDFW BIOS 2022). The Brunswick Area is generally considered wintering habitat for the California spotted owl and suitable nesting sites for the species are generally considered to be located to the east of Brunswick Road (see CDFW BIOS 2022 habitat mapping for the species). The individuals identified within the southwestern section of the Brunswick Area could be individuals that have moved in from nesting sites outside the Brunswick Area, including the Empire State Mine Historic Park where a pair of California spotted owls have previously been identified (State Parks, 2009). Surveys conducted within the Brunswick Area forested habitat for the project in December 2018, January 2019, and July 2019 did not identify the presence of the species when reconnaissance-level biological resources surveys were conducted for special-status wildlife species. In addition, on August 5, 2022, a raptor biologist with previous experience conducting USDA Forest Service protocols for surveying the California spotted owl did not identify the presence of the species when amplified calls of the California spotted owl were conducted from two (2) locations within the southwestern and western sections of the Brunswick Area (see USFWS 1992 for protocol for the presence, absence, and nest sites for the California spotted owl).

California spotted owl inhabits older, closed canopy forests and forages for prey that require woody debris and understory vegetation for cover. The species nests in cavities of trees and snags. To accurately document the location of a California spotted owl nest, USDA as part of their protocol for the California spotted owl, includes both the identification of a pair of owls and documenting the female in the nest or a male bringing a prey item (usually a mouse placed by the observer) back to a female in the nest. A sighting and/or call back of an individual, pair, and/or juvenile California spotted owl does not reflect that the species is nesting at that exact location given a California spotted owl territory can be quite large (mean up to 946 to 1,520 acres in the Tahoe Nation Forest, see Roberts 2017). The USFWS (1992) protocol for determining whether nesting is confirmed at a location includes that the following conditions are observed:

- Two observations, at least 1 week apart, are required to determine nesting status if the first observation occurs before 1 May. This is necessary because the owls may show signs of initiating nesting early in the season without actually laying eggs and their behavior could easily be mistaken for nesting behavior.
- After 1 May, a single observation is sufficient. Nesting is confirmed if, on 2 visits before 1 May, or 1 visit after 1 May several additional parameters are met.

The observer that documented the California spotted owls within the southwestern section of the Brunswick Area on April 28, 2011 stated that the sighting's highest use could be a nest and that a single young was also sighted on that day. Follow up surveys for the California spotted owl within the southwestern section of the Brunswick Area were conducted in May 2012 and in April 2016, when a pair of owls was documented within the same general location each time, but nesting was not listed as the highest level of use, just use by a pair of owls was listed. Furthermore, in 2018 (no date or month was given), a single resident California spotted owl was documented in the same general area in the southwestern section of the Brunswick Area and was considered a resident and not part of a pair.

Therefore, given there is no additional information to confirm the site was an active nest in 2011 (no confirmation of a female within the nest or confirmation of male bringing prey to an active nest with a prey item like a mouse), and given that a required follow up survey was not conducted by the observer at least 7 days after the initial documentation of the owls at this location since the initial documentation occurred in April 2011 (per the USFWS 1992 protocol), it is inaccurate to call this location a nesting site. Based on the site visits in late 2018, early 2019, and summer 2019, which did not identify the area within the southwestern section of the Brunswick Area as suitable nesting habitat for the species given a lack of required snags, etc. within that section of the Brunswick Area, it is quite likely that a single resident or pair of California spotted owl that live within the Empire State Historic Mine Park use the forested area of the southwestern section of the Brunswick Area for potential foraging and overwintering.

Centennial Industrial Site: No potential suitable habitat for this species occurs within the Centennial Industrial Site.

Brunswick Area: The potential for this species to occur within the forested areas within the southwestern and western sections of the Brunswick area is considered high. This area represents wintering and foraging habitat for the species and it is highly unlikely the species uses the area for nesting given the lack of snags and open areas within the ground that is required for foraging when nesting. Given that any vegetation to be removed within the southwestern and western forested areas of the Brunswick Area would occur between September and January, there is no likelihood for this species to be impacted, given that if present, they would fly away during the removal of such vegetation.

Page 4.4-39, DEIR Chapter 4.4, Section 4.4.2, the following discussion on monarch butterfly is added after the discussion on western bumble bee:

Monarch butterfly (*Danaus plexippus*) – Federal Candidate for ESA Listing
The monarch butterfly has not been previously identified within five miles of the Centennial Industrial Site and Brunswick Area per an updated review of the CNDDB (CNDDB 2022); however, there is some anecdotal evidence that the species has been documented within the greater Grass Valley area (per iNaturalist). Per a review of iNaturalist, the species has never been documented within the Empire Mine State Historical Park located adjacent to the Brunswick Area; however, such websites are not peer reviewed scientifically or by state or federal biologists and should be considered anecdotal until additional documentation of the species are considered validated by state and/or federal biologists, or the scientific community. The species is considered a Federal Candidate for listing under the ESA and the USFWS maps the entirety of the United States as potential habitat for the species. The Centennial Industrial Site and Brunswick Area contain a few, scattered milkweed plants (the host plant of the monarch butterfly), but given the species was never documented within either the Centennial Industrial Site or the Brunswick Area during botanical and

wildlife surveys, the species is considered to have a low probability of occurring within either the Centennial Industrial Site or the Brunswick Area.

Pages 4.4-64 through 4.4-66, DEIR Chapter 4.4, Section 4.4.4, Mitigation Measure 4.4-1(a) is hereby revised as follows:

4.4-1(a) *i.* *Prior to issuance of grading permits for the Centennial Industrial Site, the project applicant shall obtain an Incidental Take Permit (ITP) from CDFW for Project-related impacts to the Pine Hill Flannelbush. During the consultation process with CDFW, the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP) shall be revised if required by CDFW, and must be approved by CDFW prior to implementation. This HMP shall include habitat enhancement and conservation easement requirements. If the USFWS determines that the plants within the Study Area are the federally endangered Pine Hill flannelbush prior to project implementation, then a USFWS Biological Opinion must also be secured, and the USFWS would also need to approve the HMP prior to implementation. Note that the measures outlined below are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.*

Prior to issuance of grading permits for the Centennial Industrial Site, implement project-specific mitigation measures 1-3 outlined below consistent with the County and CDFW approved HMP, as well as the Habitat Enhancement and Conservation Easement. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits).~~implement project-specific mitigation measures 1-3 within the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP), to the satisfaction of the County, USFWS and CDFW. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits):~~

1. *Seed Collection;*

   Collect seed for seedbanking and for future replacement and recovery efforts pursuant to the requirements of Section 6.2 of the HMP.

2. *Develop Transplantation Plan and Monitoring Plan;*

   The Transplantation and Monitoring Plan shall be developed in consultation with USFWS and CDFW, and shall, at a minimum, address location(s) for dormant season relocation, site selection for transplanting, and metrics of successful establishment (i.e., Section 6 of the HMP).

3. *Transplanting;*

   Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.

4. *Transplant Monitoring; and*

   Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants, transplanting will have been deemed successful.

5. *Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)*

   If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken:

   - *Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.*
   - *Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.*
   - *Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.*
   - *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.*

ii. *Habitat Enhancement:* *Prior to issuance of grading permits, pursuant to the HMP, the applicant shall enhance Pine Hill flannelbush habitat outside the disturbance footprint, which could include removal of invasive plants and conducting a pilot study by collaborating with CAL FIRE or other research facility to conduct prescribed fire in areas to enhance natural germination and recruitment, as Pine Hill flannelbush need fire for successful germination, and root sprouts.*

iii. *Conservation Easement:* *Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and*

its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any offsite areas not owned by the applicant where the transplants are to be located.

Pages 4.4-66 through 4.4-67, DEIR Chapter 4.4, Section 4.4.4, Mitigation Measure 4.4-1(b) is hereby revised as follows:

Other Special-Status Plant Species

4.4-1(b) *Prior to issuance of grading permits for the Centennial Industrial Site and Brunswick Area (i.e., Brunswick Industrial Site and East Bennett Road ROW), focused plant surveys shall be performed according to CDFW and CNPS protocol (e.g., "Procotols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities", CDFW 2018), as generally described below. If special-status plant species (i.e., federal and/or state endangered, threatened, or proposed candidates for listing; CRPR Lists 1 or 2) are not found during appropriately timed focused surveys, then further mitigation is not necessary. The results of the surveys shall be submitted to the Nevada County Planning Department.*

Prior to Improvement Plan approval for each phase of the project, focused surveys shall be performed by a qualified botanist during the appropriate early blooming period ~~(April to May)~~ for those special-status plant species identified in the Biological Resources Assessments as potential occurring within the Centennial Industrial Site and/or Brunswick Area. Furthermore, should additional plants having the potential to occur within these areas be given special-status in the future, the qualified botanist shall also determine the presence/absence of such species. The survey(s) shall be conducted on-site as well as in any off-site improvement areas, as applicable for each phase, during the early identification periods (bloom periods) for all potentially occurring special-status plant species. If the special-status plant species are not found to be present during the focused survey(s), then no further action is required. The results of the focused surveys shall be submitted to the Nevada County Planning Department.

If any special-status plant species are found, ~~protection of such plant shall include complete avoidance, transplantation, or on- or off-site restoration of the special-status plant species that could be impacted by site disturbance. These protective measures for such plants shall be included as part of the required development of a Habitat Management Plan (HMP) as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12, which includes regulations intended to avoid the impact of development on rare, threatened, endangered, and special-status species and their habitat, or where avoidance is not possible, to minimize or compensate for such impacts and to retain their habitat as non-disturbance open space~~ and they are located in an area where impacts are proposed, then the special-status plants shall be completely avoided until a Habitat Management Plan (HMP) is developed and approved by the Nevada County Planning Department. If the plant is listed on the federal or state Endangered Species lists or is state listed as rare, then development of this plan shall be conducted in consultation with USFWS and/or CDFW, respectively, and a BO and/or an ITP shall be obtained prior to impacts. The HMP shall include the avoidance, minimization, and mitigation measures outlined below as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12.

Note that transplantation and monitoring specifics are examples only, and final details will be developed based on the species to be impacted, if any.

At a minimum, the HMP shall include the following protective measures for special-status plant species with the potential to be impacted by the proposed disturbance:

- *a map of the location of special-status species that may be disturbed or need to be protected;*
- *location of environmental protection fencing to be placed around the individual plants to be protected;*
- *identification of the location of protected plants on design and construction drawings;*
- *environmental awareness training for all personnel working on the project during initial site disturbance to discuss the location of the protected plants and the measures to be taken to avoid impacts to them; and*
- *a qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special-status plants and weekly ~~site~~ monitoring of the protective fencing along fencing along the buffer zone ~~by a qualified biologist to ensure that the special-status plants are being protected during site disturbance and construction~~.*

Where individuals would be potentially affected directly by site disturbance and transplantation of individual plants is required to minimize and mitigate for impacts to such species, the following shall be integrated into the HMP:

- *remove bulbs of individual plants to be directly impacted during the dormant season;*
- *relocate the bulbs to a site with similar soil, hydrologic, vegetation type and aspect as the portion of the project site where the plants are found; and*
- *identify the location(s) for dormant season relocation and site selection for transplantation.*

The HMP would also include a requirement to meet the following criteria:

- *metrics of successful establishment, which would include a minimum of 80 percent survival of the transplants after two years of transplanting the species.*

If the 80 percent survival is not established after two years, transplants of individuals grown from seed shall be planted at a location with similar soil, hydrologic, vegetation type and aspect as the portion of the site where they are found. Transplantation shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced. Transplants shall be monitored every month for the first six months, then every two months for a minimum of two years. After two summer seasons of monitoring identifies successful establishment of 50 percent of the initial transplants, transplant seedlings will be deemed successful.

Page 4.4-77, DEIR Chapter 4.4, Section 4.4.4, first paragraph of Mitigation Measure 4.4-2(b) is hereby revised as follows:

Western Pond Turtle

4.4-2(b) *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults. If the pre-construction survey does not detect western pond turtle, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a western pond turtle is found, it should be allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species. Work in the area shall cease and fencing or other protective measures shall be employed to excluded and prevent access to the area until the identified turtle has cleared the area.*

Page 4.4-79, DEIR Chapter 4.4, Section 4.4.4, second and third paragraphs are hereby revised as follows:

California Black Rail

4.4-2(d) *Pre-construction Survey and Avoidance and Minimization Measures. Pre-construction surveys for California black rail shall be conducted by a qualified biologist prior to the implementation of any ground disturbance within or directly adjacent to any perennial marsh and wet meadow habitat within the Centennial and Brunswick Industrial Sites. The pre-construction surveys for this species shall occur no more than fourteen (14) days prior to any such disturbance within or directly adjacent to the species habitat. The pre-construction surveys shall include conducting call back/response surveys. This species is most active between two hours before and three hours after sunrise; therefore, surveys shall start at sunrise and continue no later than 0930. If evening surveys are to be conducted, they shall be paired with a morning survey, and all sites shall have surveys conducted at both time periods. The preferred method for conducting surveys via the call-back/response protocol of Evens et al (1991). If the pre-construction survey does not detect evidence of California black rail, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a positive call back is identified during the surveys, then the species is assumed to be present and the area shall be avoided from disturbance in order to avoid impacts to individuals of the species, if feasible.*

Given the species is a CESA listed species, coordination with CDFW shall occur if a positive response to the call-back/response surveys occurs and if any proposed disturbance may impact the species. Any area containing this species would likely need to be avoided in order to avoid impacts to and take of this species, if feasible, or additional mitigation measures would be required in coordination with CDFW to minimize and avoid impacts to such species. Additional avoidance measures could include, but may not be limited to the following: environmental awareness training, daily construction monitoring by a CDFW qualified biologist when

disturbance related activities occur within or directly adjacent to the species habitat, and exclusionary fencing installation between the species habitat and the proposed disturbance areas. ~~Additionally, an ITP could be required by CDFW if complete avoidance of the species is not feasible.~~ Areas where no positive response to the call-back/response surveys are assumed to not contain individuals of the species and therefore, disturbance in those areas would have no impact on this species.

Watercourse/Wetlands/Riparian Areas Management Plans. The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial and Brunswick Industrial Sites, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control.

Page 4.4-80, DEIR Chapter 4.4, Section 4.4.4, second paragraph of Mitigation Measure 4.4-2(e) is hereby revised as follows:

Coast Horned Lizard

4.4-2(e) *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance within the areas of the Centennial and Brunswick Industrial Sites that contain disturbed or developed surfaces and annual grassland vegetation community. If the pre-construction survey does not show evidence of coast horned lizard, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.*

If the species is documented during pre-construction survey(s), a qualified wildlife biologist (approved by CDFW) shall move individual coast horned lizards outside of the proposed disturbance area(s) in order to avoid an impact to this species. The qualified biologist shall have all required permits before commencing species specific surveys. Once the coast horned lizard(s) have been removed from the disturbance area(s) and out of harm's way, the proposed work would no longer pose a risk to individuals of the species.

Page 4.4-80, DEIR Chapter 4.4, Section 4.4.4, second paragraph of Mitigation Measure 4.4-2(f) is hereby revised as follows:

Special-Status Bats

4.4-2(f) *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction bat roosting survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance of any structures or riparian and forested woodlands within the Centennial Industrial Site and Brunswick Area to identify the presence or absence of roosting bats. If the pre-construction survey does not show evidence of roosting bats, a letter report documenting the results of the survey shall be provided to the*

Nevada County Planning Department, and additional measures are not required.

If any Townsend's big-eared bats (or any other species of bat, including the hoary and pallid bat) are identified during roosting surveys, passive removal of the roosting bats prior to disturbance to structures and riparian and forested woodlands shall be implemented to avoid impacts to this species. Passive removal includes allowing roosting bats to freely leave the roost site (riparian and forested woodlands and any structure). Once the roosting bats have been passively removed from the structure(s) and riparian and forested woodlands, the structure(s) would be closed off from recurring bat roosting within the structure(s) and the proposed work within the structure(s) would no longer pose a risk to individuals of the species. For riparian and forested woodlands containing bat roosts, the removal of trees associated with such woodlands would only occur once the bats leave the day roosts. Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until a qualified bat biologist has determined the young bats are no longer roosting and the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in.

Page 4.4-81, DEIR Chapter 4.4, Section 4.4.4, first and second paragraphs are hereby revised as follows:

~~*Non-Special Status Raptors and Migratory*~~ *Nesting Birds*

4.4-2(g) *Pre-construction Survey and Avoidance and Minimization Measures. Prior to initiation of ground-disturbing activities for any phase of project construction, if construction is expected to occur during the raptor nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal, including one daytime survey and one nighttime survey targeted at a California spotted owl, consistent with the USFWS (1992) California spotted owl survey protocol. The pre-construction survey shall be conducted within 7 days prior to commencement of ground-disturbing activities. The survey shall be conducted within all areas of proposed disturbance and all accessible areas within 250 feet of proposed disturbance. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required. Removal of any trees within the Brunswick Area would occur between September 1st and January 31st to ensure that no nesting birds, raptors, or owls would be impacted by the proposed IMM project.*

If any active nests are located within the proposed disturbance area, including active nests within riparian habitat for the yellow-breasted chat, willow flycatcher, yellow warbler, and olive-sided flycatcher, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically 100 feet for migratory bird nests and 500 feet for raptor nests. If active nests are found within the disturbance footprint, a qualified

biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical and/or the willow flycatcher, a State listed species, is documented nesting during the pre-construction surveys for nesting birds. Additionally, an ITP could be required by CDFW if complete avoidance of willow flycatcher is not feasible. If construction activities cause the nesting bird(s) to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased, as determined by the qualified biologist, such that activities are far enough from the nest to stop the agitated behavior. The exclusionary buffer shall remain in place until the young have fledged or as otherwise determined by a qualified biologist.

Pages 4.4-91 and 4.4-92, DEIR Chapter 4.4, Section 4.4.4, Mitigation Measures 4.4-3(c) and 4.4-3(d) are hereby revised as follows:

4.4-3(c) *To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Prior to initiation of ground-disturbing activities, a Section 404 permit for fill of any jurisdictional wetlands within the Centennial Industrial Site and Brunswick Area shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the Corps "no-net-loss" policy, be provided at a minimum 1:1 ratio and be based on the final impact acreages verified by the Corps. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines. Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank.*

The applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Nevada County Planning Department.

4.4-3(d) *Prior to initiating of ground disturbing activities within the non-disturbance buffers for aquatic resources on the Centennial Industrial Site and Brunswick Area, the applicant shall apply for a Section 1600 Lake or Streambed Alteration Agreement from CDFW. Impacts to CDFW 1600 jurisdictional areas shall be outlined in the application and are expected to be in substantial conformance with the impacts to biological resources outlined in this EIR (see Tables 4.4-9 through 4.4-11). Impacts for each activity shall be broken down by temporary and permanent, and a description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent. Minimization and avoidance measures within jurisdictional areas shall be proposed as appropriate and may include: preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed*

areas immediately adjacent to riparian areas with native seed, and installation of project-specific storm water BMPs. Mitigation may include restoration or enhancement of jurisdictional resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, off-site or on-site conservation easements, working with a local land trust to preserve aquatic or riparian areas, or any other method acceptable to CDFW. Mitigation shall be provided at a minimum 1:1 ratio.

A site revegetation plan would be required to be developed and approved by CDFW as part of a Streambed Alteration Agreement permit condition and native trees planned for removal with a diameter at breast height of 4 inches or greater would need to be mitigated for through planting of native riparian trees within adjacent stream zones not being impacted by the Idaho-Maryland Mine Project, with clear success criteria identified, monitoring and reporting required, and corrective actions to be taken if mitigation measures do not meet the proposed success criteria.

Written verification of the Section 1600 Lake or Streambed Alteration Agreement shall be submitted to the Nevada County Planning Department.

The foregoing revisions to Chapter 4.4, Biological Resources, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

4.5 Cultural and Tribal Cultural Resources

Page 4.5-29, DEIR Chapter 4.5, Section 4.5.4, Mitigation Measures 4.5-1(a) and (b) are hereby revised as follows:

4.5-1(a) ~~*Following initial mine dewatering, and p*~~*P*rior to ~~*commencement of underground mining*~~ *issuance of building permits, the project applicant shall share the historical documentation of the Idaho-Maryland Mine Company in their possession with the public through one of the following libraries: the California State Library, the California Geology and Mining Library, or the Searls Library. The library shall consist of the following information:*

- *Surface Maps (5 maps) – Approx. year at 1956, Showing topography, buildings, roads, exploration trenches and drill holes, underground workings at surface, and geology;*
- *103 Level Maps (103 maps) – Approx. year 1942, Showing mine tunnels, raises and shafts, survey stations, geology, and drill holes;*
- *Mine Geology Maps (61 maps) – Approx. year 1956, Showing geology on tunnels driven post WW2;*
- *Mine Stoping Maps (219 Maps) – Approx. year 1956, Showing mine stoping;*
- *Operation Reports 1919 to 1924 and 1926 to 1935, Providing monthly or annual reports on underground exploration and mine development;*
- *Monthly Development Reports – 1936 to 1956, Providing monthly reports on mine development;*

- *Geological Summary Reports – 1936 to 1942, Providing monthly reports on underground exploration;*
- *Underground Geology Photos – Collection of photos from 1940's of underground tunnels and geology; and*
- *A digital mine model, including a 2D and 3D digitization of historic mine tunnels available in AutoCAD dwg and dxf formats.*

Proof of submittal to one of the above-listed libraries shall be provided to the Nevada County Planning Department.

4.5-1(b) Following initial mine dewatering, and prior to commencement of underground mining, the project applicant shall retain a qualified historian meeting the Secretary of the Interior's standards, to perform a historical study of the underground mine workings in the areas deemed safe by a certified mining geologist. The historical study shall include but not be limited to an evaluation of the underground work environment, engineering, equipment, and practices, to the maximum extent feasible. The historical study shall be deposited at the same library selected in Mitigation Measure 4.5-1(a) and submitted to the Nevada County Planning Department.

The foregoing revisions consist of minor changes to mitigation measure timing and reviewing parties and do not affect the adequacy of the DEIR.

4.7 Hazards and Hazardous Materials

Page 4.7-11, DEIR Chapter 4.7, "Emergency Response and Evacuation", first full paragraph, is hereby revised to reflect the most current information regarding Zone Haven:

With respect to determining an evacuation area, the current approach is typically through the incident command system, whereby an incident command center is set up at a strategic location to assess and respond to the emergency incident. For example, in the event of a wildfire, fire agencies will set up ~~an incident~~ unified command ~~center~~ in partnership with the appropriate law enforcement agency. In the unincorporated area of Nevada County this will be ~~, from which the fire agencies will notify~~ the Sheriff's Office. The Sheriff's Office will confer with the fire agencies ~~at the incident command center~~ to determine the evacuation area based upon certain critical factors. ~~While this is the current approach, it is noted that t~~The Nevada County Office of Emergency Services (OES) recently entered into contract with Zone Haven, a company that works from a zone-based approach to emergency evacuation.[7] In general, geographic zones are developed based on topography, population, traffic routes, etc. There are numerous zones adjacent to or encompassing the mine site. In the event of a wildfire, the Sherriff's Office would likely issue evacuation orders based upon these zones. The zones can be modified if necessary to accommodate changing populations, new business growth, changing roadways and other factors~~Greenhorn Road area would likely have several zones because it is a relatively large area. The new system should be up and running within a year~~.[8]

The above revisions primarily serve to clarify that the Zone Haven system is now up and running. No changes to the environmental analysis, nor findings of the DEIR, result from this clarification.

Page 4.7-28 and 4.7-29, DEIR Chapter 4.7, Section 4.7.4, the final paragraph on page 4.7-28, which continues onto the next page, is hereby revised as follows:

The warehouse building would include storage of common reagents, such as collectors, promoters, frothers, and flocculants, all of which would be used in the gold recovery

process conducted in the process plant. These reagents are needed in the gold recovery process to provide a more environmentally friendly alternative to cyanide, which will not be used. According to the Hazardous Material Inventory Statement for the Brunswick Industrial Site, common names of the proposed reagent chemicals include Aerophine, Methyl Isobutyl Carbinol (MIBC), and Magnafloc 10~~, and Soda Ash~~. Aerophine is known as a promoter or collector, used in flotation to increase the floatability of minerals in order to effect their separation from the undesirable mineral fraction. Flotation is an industrial process for selectively separating valuable minerals from non-valuable minerals. The applicant has selected Aerophine over xanthates as the latter can generate carbon disulfide upon decomposition, which is known to be a highly toxic and flammable compound with potential risks to the health and the environment. Magnafloc 10 is known as a flocculant, which help aggregate fine suspended particles to form larger flocs so that the solids can more easily be separated from the water. Magnafloc 10 is not expected to bioaccumulate in organisms, its chemical family (polyacrylamide) is relatively non-toxic, and it is not readily biodegradable into more environmentally problematic chemicals.[16] MIBC is a frother used to create foam to facilitate froth flotation of gold minerals in the gold recovery process. Based on available data, MIBC has a low bioaccumulation potential and exhibits low toxicity to aquatic organisms.[17] ~~Soda Ash is used in gold flotation to control alkalinity.~~ These reagents have various properties, some of which are described above. Whereas some are flammable (e.g., MIBC), others are not ~~(e.g., Soda Ash)~~. The reagents would be removed from the concentrate and sand tailings during the dewatering stage conducted in the process plant using filter presses. All reagents have specific storage requirements that would need to be met on-site, as verified by the Fire Marshall's Office prior to commencement of operations.

The foregoing revisions to Chapter 4.7, Hazards and Hazardous Materials, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

4.8 Hydrology and Water Quality

Page 4.8-2, DEIR Chapter 4.8, Section 4.8.2, first paragraph under the Regional Hydrology heading is hereby revised as follows:

Regional Hydrology

The project sites are located within two watershed areas. The Centennial Industrial Site is located in the Upper Wolf Creek watershed, which encompasses approximately ~~2,250~~ 2,820 acres upstream from the western end of the Centennial Industrial Site. The Brunswick Industrial Site is located in the South Fork Wolf Creek watershed, which encompasses approximately 1,450 acres and is upstream of a culvert where the creek passes underneath part of the City of Grass Valley. Figure 4.8-1 shows an overview of the Upper Wolf Creek and South Fork Wolf Creek watersheds.

Page 4.8-28, DEIR Chapter 4.8, Section 4.8.3, first paragraph under the General Permit for Limited Threat Discharges to Surface Waters subheading is hereby revised as follows:

General Permit for Limited Threat Discharges to Surface Waters

The Limited Threat General Order (R5-~~2016-0076-01~~ 2022-0006) is a general Waste Discharge Requirements permit for Limited Threat Discharges to Surface Water. The discharge of treated water from the proposed mine into South Fork Wolf Creek is anticipated to be covered as a Tier 3 discharge of hard rock mine wastewater. Under Table 3 of the Limited Threat Discharge permit, Tier 3 discharges to surface water that are greater

than 250,000 gpd (greater than 175 gpm) and/or that are longer than four months are allowed if the water to be discharged (with or without treatment) meets the applicable screening levels in the permit.

Page 4.8-45, DEIR Chapter 4.8, Section 4.8.4, first paragraph is hereby revised as follows:

Ongoing monitoring of influent and effluent (i.e., treated water) will be required by the State, in order for the applicant to receive coverage under the State's Limited Threat Discharge Permit (General Order R5-~~2016-0076~~ 2022-0006; NPDES No. CAG995002). Monitoring of treated water would occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek. The owner will be required to submit quarterly monitoring reports to the State RWQCB, demonstrating compliance with the maximum daily effluent limitations specified in Section V of the NPDES permit. Compliance with the water quality standards and waste discharge requirements in Order No. R5-~~2016-0076~~ 2022-0006 would prevent any degradation of surface water quality due to dewatering.[16]

Page 4.8-52, DEIR Chapter 4.8, Section 4.8.4, first paragraph of Mitigation Measure 4.8-1(a) is hereby revised as follows:

4.8-1(a) *The applicant shall submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-~~2016-0076~~ 2022-0006; NPDES No. CAG995002), at least six months prior to construction of the water treatment system; and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin and provided to Nevada County Planning Department. The NOI shall include evaluation of potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1,2-DCE, and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals identified in the Limited Threat Discharge Order. Upon construction of the WTP, sampling shall be provided to the RWQCB demonstrating that the treated water meets the water quality standards and treatment goals specified in the Order. Ongoing monitoring of treated water shall occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek. The owner shall be required to submit quarterly monitoring reports to the State Regional Water Quality Control Board, demonstrating compliance with the maximum daily effluent limitations specified in Section V of the NPDES permit. The applicant shall submit to the County a copy of the NOI and evidence of the applicant's receipt of the NOA specified above prior to initial mine dewatering. The applicant shall submit copies of sampling and monitoring reports to the County at the time such reports are submitted to the RWQCB.*

Page 4.8-53, DEIR Chapter 4.8, Section 4.8.4, final paragraph is hereby revised as follows:

4.8-1(e) *The applicant shall submit a RoWD and obtain WDRs from the Central Valley RWQCB for construction of the engineered fill areas. The WDR permit shall be received by the applicant prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites. Proof of coverage shall be provided to the Nevada County Public Works Department. As part of this process, the RWQCB will determine the appropriate mining waste classification for the proposed engineered fill, and will consider the following factors: (1) whether the waste contains*

hazardous constituents only at low concentrations; (2) whether the waste has no or low acid generating potential; and (3) whether, because of its intrinsic properties, the waste is readily containable by less stringent measures. The engineered fill areas shall be constructed in accordance with the Title 27 specifications, pursuant to the mining waste classification determined by the RWQCB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the placement of fill or fill site preparation disturbance at the Brunswick Industrial Site and Centennial Industrial Site. The RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant will prepare and implement a Waste Characterization Plan (Characterization Plan) which will be incorporated into the approved WDR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes will be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e. sites other than the applicants Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization will be established in the approved WDR.

Page 4.8-67, DEIR Chapter 4.8, Section 4.8.4, Mitigation Measure 4.8-2(a) is hereby revised as follows:

4.8-2(a) *The project applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County. Implementation of the GMP shall be initiated prior to the dewatering of the mine and on an ongoing basis. Pursuant to the GMP, a network of monitoring wells shall be installed to the satisfaction of the Nevada County Environmental Health Department. Prior to construction of any monitoring wells within the County or City right-of-way, the applicant shall obtain an encroachment permit from the Public Works Department of the respective agency. Groundwater-level and groundwater quality information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health Department, and used to generate the following information:*

1) *Water-level and groundwater quality monitoring data for a minimum of 12 months before commencement of dewatering of the mine.*
2) *Water-level hydrographs for each well showing the water-level variations over the monitoring period and a comprehensive well hydrograph showing long-term water levels for each well over the entire monitoring period.*

Page 4.8-68, DEIR Chapter 4.8, Section 4.8.4, Mitigation Measure 4.8-2(c) is hereby revised as follows:

4.8-2(c) *Prior to commencement of initial mine dewatering, the project applicant shall implement the Well Mitigation Plan (February 2, 2021, Rise Grass Valley, Inc.) by connecting 30 properties in the East Bennett area to the NID potable water system (see Figure 1 and Table 1 of the Well Mitigation Plan for specific property locations). The project applicant shall be responsible for fully funding the following for each property connection:*

1) *Engineering and Permitting to NID and County standards.*
2) *Construction of main water piping, interconnecting the existing NID pipelines at E. Bennet Road and Whispering Pines Lane in accordance with NID standards and NID approved engineering design.*
3) *Construction of service lateral piping in accordance with NID standards and NID approved engineering design.*
4) *Installation of water meters at property line in accordance with NID standards and NID approved engineering design.*
5) *Connection of water meters to house (If requested and authorized by property owner)*
6) *Closure of domestic water wells (If requested and authorized by property owner)*
7) *NID installation and capacity charges for a 5/8-inch meter connection.*
8) *Reimbursement for water charges, for monthly fixed service charges and use of up to 400 gallons per day, will continue until the sooner of the following occurs: 1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise. 2) The property is annexed into the City of Grass Valley.*
9) *Of the 30 properties, it is anticipated that only APN 009-600-012 is not eligible for water cost reimbursement as it is currently vacant. Existing NID customers will not be eligible for reimbursement of NID water charges and will be confirmed through consultation with NID during the design process.*
10) *All easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the applicant and conveyed to NID prior to acceptance of the new potable line.*

Proof of satisfaction of this measure shall be provided to Nevada County Environmental Health Department for each property identified in the Well Mitigation Plan.

Page 4.8-79, DEIR Chapter 4.8, Section 4.8.4, first paragraph under Impact 4.8-6 is hereby revised as follows:

The current water quality control plan for the region is the Water Quality Control Plan for the Sacramento and San Joaquin River Basins, which is also referred to as the Basin Plan (CVRWQCB, 2019). The project would be required to operate under an applicable WDR permit from the CVRWQCB for placement of any waste material on land. The dewatering discharge to South Fork Wolf Creek would also need to comply with the requirements of the applicable NPDES permit Order R5-~~2016-0076~~ 2022-0006 (NPDES No. CAG995002) for Limited Threat Discharges to Surface Water as a Tier 3 discharge. The WDR and NPDES requirements ensure that the project would not conflict with or obstruct implementation of the Basin Plan.

The foregoing revisions to Chapter 4.8, Hydrology and Water Quality, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

4.10 Noise and Vibration

Pages 4.10-18 and 4.10-19, DEIR Chapter 4.10, Section 4.10.4, Table 4.10-6 is hereby revised at the end of this section to correct the placement of L_{eq} and L_{max} labels.

Page 4.10-32, DEIR Chapter 4.10, Section 4.10.4, Table 4.10-12 is hereby revised as follows:

Table 4.10-12
Centennial Industrial Site: Engineered Fill Activity Noise Levels

Receptor	Minimum Distance	Predicted Noise Level		Daytime Noise Criteria		Criteria Exceeded?	
		L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	500	~~54~~56	~~61~~71	63	81	**NO**	**NO**
2	600	~~50~~52	~~60~~68	68	86	**NO**	**NO**
8	1000	~~44~~51	~~42~~65	55	75	**NO**	**NO**

Note: Engineered fill placement, grading and compaction activities would be limited to daytime hours. As a result, only the daytime criteria are utilized for the assessment of potential noise impacts for this activity.

Source: Bollard Acoustical Consultants, Inc. (2021).

Page 4.10-33, DEIR Chapter 4.10, Section 4.10.4, Table 4.10-14 is hereby revised as follows:

Table 4.10-14
Brunswick Industrial Site: Engineered Fill Activity Noise Levels

Receptor	Minimum Distance	Predicted Noise Level		Daytime Noise Criteria		Criteria Exceeded?	
		L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
15	1400	45	~~45~~50	55	75	**NO**	**NO**
16	1600	46	~~46~~57	53	75	**NO**	**NO**
17	2000	40	~~40~~51	61	75	**NO**	**NO**
18	1600	47	~~47~~59	55	74	**NO**	**NO**
19	1300	40	~~40~~42	55	74	**NO**	**NO**
20	1000	46	~~46~~48	62	75	**NO**	**NO**
21	700	47	~~47~~50	60	75	**NO**	**NO**
22	500	52	~~52~~57	61	75	**NO**	**NO**
23	400	55	~~55~~61	63	75	**NO**	**NO**

Continued on next page

Table 4.10-14
Brunswick Industrial Site: Engineered Fill Activity Noise Levels

Receptor	Minimum Distance	Predicted Noise Level		Daytime Noise Criteria		Criteria Exceeded?	
		L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
24	350	50	~~50~~60	65	80	**NO**	**NO**
25	650	50	~~50~~63	65	75	**NO**	**NO**
26	300	51	~~51~~61	55	69	**NO**	**NO**
27	600	46	~~46~~49	55	69	**NO**	**NO**
28	500	47	~~47~~51	55	69	**NO**	**NO**
29	1200	40	~~40~~41	55	69	**NO**	**NO**
30	1800	~~32~~27	~~32~~30	55	69	**NO**	**NO**

Note: Engineered fill placement, grading and compaction activities would be limited to daytime hours. As a result, only the daytime criteria are utilized for the assessment of potential noise impacts for this activity.

Source: Bollard Acoustical Consultants, Inc. (2021).

Page 4.10-19, DEIR Chapter 4.10, Section 4.10.4, Table 4.10-19 is hereby revised as follows:

Table 4.10-19
Predicted Combined Noise Levels from All Daytime Sources at Nearest Receptors

Receptor	Project Daytime Noise Generation		Daytime Noise Criteria		Criteria Exceeded?	
	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	56	~~68~~71	63	81	**NO**	**NO**
2	54	~~67~~68	68	86	**NO**	**NO**
3	39	46	66	87	**NO**	**NO**
4	37	43	60	75	**NO**	**NO**
5	29	34	54	71	**NO**	**NO**
6	29	34	55	72	**NO**	**NO**
7	29	33	54	71	**NO**	**NO**
8	~~38~~52	~~48~~65	55	75	**NO**	**NO**
9	35	41	53	71	**NO**	**NO**
10	34	40	52	71	**NO**	**NO**
11	34	42	52	72	**NO**	**NO**
12	33	41	54	74	**NO**	**NO**
13	34	43	55	75	**NO**	**NO**
14	41	48	55	75	**NO**	**NO**
15	~~44~~45	55	55	75	**NO**	**NO**
16	~~45~~46	~~51~~57	53	75	**NO**	**NO**
17	43	~~49~~51	61	75	**NO**	**NO**
18	47	~~53~~59	55	74	**NO**	**NO**
19	41	50	55	74	**NO**	**NO**
20	47	55	62	75	**NO**	**NO**
21	47	58	60	75	**NO**	**NO**
22	~~51~~52	62	61	75	**NO**	**NO**
23	55	67	63	75	**NO**	**NO**
24	50	66	65	80	**NO**	**NO**
25	49	67	65	75	**NO**	**NO**

Continued on next page

Table 4.10-19
Predicted Combined Noise Levels from All Daytime Sources at Nearest Receptors

	Project Daytime Noise Generation		Daytime Noise Criteria		Criteria Exceeded?	
Receptor	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
26	51	68	55	69	**NO**	**NO**
27	46	57	55	69	**NO**	**NO**
28	~~46~~47	57	55	69	**NO**	**NO**
29	40	50	55	69	**NO**	**NO**
30	34	39	55	69	**NO**	**NO**

Source: Bollard Acoustical Consultants, Inc. (2021).

Pages 4.10-58 and 4.10-59, DEIR Chapter 4.10, Section 4.10.4, Mitigation Measure 4.10-4 is hereby revised as follows:

4.10-4 *The project applicant shall conduct a project-specific Ground Vibration Monitoring Program, as set forth in this mitigation measure. As part of the Ground Vibration Monitoring Program, the mine shall employ between eight and ten seismographs, which shall be installed prior to any onsite blasting, and used during all blasting of levels above the 1,000-foot level. The seismographs shall be placed at the following locations:*

- *One at the Brunswick Shaft;*
- *One at each of the four corners of the Mine Property;*
- *One in the Whispering Pines Industrial Park;*
- *Two at nearby residences; and*
- *Two travelling seismographs which can change location depending on the weekly/monthly mining plan.*

After the mine has stopped blasting at the proposed shaft and above the 1,000-foot level, only five seismographs would be required for the Ground Vibration Monitoring Program. One seismograph shall be located at the Brunswick Shaft and one in each of the four corners of the mine property. The five seismographs would collect relevant data throughout the entire operation to understand how the ground is transmitting vibration in these areas.

Once mining operations commence, the project applicant shall hire a blast consultant to assist with the development of a 95 percent confidence level equation for the site-specific ground vibration. The blast consultant shall assess the data acquired by the seismographs using a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain below 0.4 in/s at sensitive receptors.

Results of the Ground Vibration Monitoring Program and the equation for site-specific ground vibration shall be submitted to the Nevada County Planning Department, on a monthly basis, for review.

Table 4.10-6
Baseline Ambient Conditions and Adjusted Nevada County Noise Standards by Receptor

	Baseline Ambient Conditions[1]						Applicable Standards After Adjustment					
	Daytime[3]		Evening[3]		Nighttime[3]		Daytime		Evening		Nighttime	
Receptor[2]	L_{eq}	L_{max}	L_{eq}	L_{max}	~~L_{max}~~ L_{eq}	~~L_{eq}~~ L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
1	58	76	51	68	50	66	63	81	56	73	55	71
2	63	81	56	73	55	71	68	86	61	78	60	76
3	61	82	53	71	51	69	66	87	58	76	56	74
4	55	72	53	65	56	70	60	75	58	70	61	75
5	49	66	47	59	50	64	54	71	50	64	55	69
6	50	67	48	60	51	65	55	72	50	65	56	70
7	49	66	47	59	50	64	54	71	50	64	55	69
8	54	72	49	69	45	65	55	75	50	74	45	70
9	48	66	43	63	39	59	53	71	48	65	44	60
10	47	66	43	64	37	58	52	71	48	65	42	60
11	47	67	43	65	37	59	52	72	48	70	42	60
12	49	69	45	67	39	62	54	74	50	72	44	67
13	51	70	48	69	41	64	55	75	50	74	45	69
14	50	72	48	72	42	64	55	75	50	77	45	69
15	51	73	49	72	43	65	55	75	50	77	45	70
16	48	71	46	71	40	62	53	75	50	76	45	67
17	56	73	54	66	57	71	61	75	59	71	62	76
18	52	69	50	62	53	67	55	74	50	65	58	72
19	54	69	51	68	46	65	55	74	56	73	51	70
20	57	72	55	72	50	68	62	75	60	77	55	73
21	55	70	53	70	48	66	60	75	58	75	53	71
22	56	71	53	70	48	67	61	75	58	75	53	72
23	58	73	56	73	51	69	63	75	61	78	56	74
24	60	75	58	75	53	71	65	80	63	80	58	76
25	60	75	57	74	52	71	65	75	62	79	57	76
26	51	64	49	63	44	56	55	69	50	65	45	60
27	51	64	49	63	44	56	55	69	50	65	45	60
28	51	64	49	63	44	56	55	69	50	65	45	60
29	51	64	49	63	44	56	55	69	50	65	45	60

Table 4.10-6
Baseline Ambient Conditions and Adjusted Nevada County Noise Standards by Receptor

	Baseline Ambient Conditions[1]						Applicable Standards After Adjustment					
	Daytime[3]		Evening[3]		Nighttime[3]		Daytime		Evening		Nighttime	
Receptor[2]	L_{eq}	L_{max}	L_{eq}	L_{max}	~~L_{max}~~ $_{eq}$	~~L_{eq}~~ $_{max}$	L_{eq}	L_{max}	L_{eq}	L_{max}	L_{eq}	L_{max}
30	51	64	49	63	44	56	55	69	50	65	45	60

Notes:
1. Baseline ambient conditions at each representative receptor were established through extrapolating the Table 4.10-1 data closest to each receptor using a 4.5 dB per doubling of distance decay rate.
2. Receptor locations are indicated on Figure 4.10-2.
3. Daytime = 7:00 AM – 7:00 PM; Evening = 7:00 PM – 10:00 PM; Nighttime = 10:00 PM – 7:00 AM

Source: Bollard Acoustical Consultants, Inc. (2021).

The foregoing revisions to Chapter 4.10, Noise and Vibration, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

4.12 Transportation

Page 4.12-12, DEIR Chapter 4.12, Section 4.12.2, Figure 4.12-1 is hereby replaced with the figure shown on the following page.

Pages 4.12-13 and 4.12-14, DEIR Chapter 4.12, Section 4.12.2, Table 4.12-2 is hereby revised as shown on the following pages.

Page 4.12-17, DEIR Chapter 4.12, Section 4.12.2, first and third paragraph and Table 4.12-4 are hereby revised as follows:

Existing Vehicle Miles Traveled

VMT is a metric that accounts for the number of vehicle trips generated and the length or distance of those trips. The available measures of VMT for Nevada County include the following:

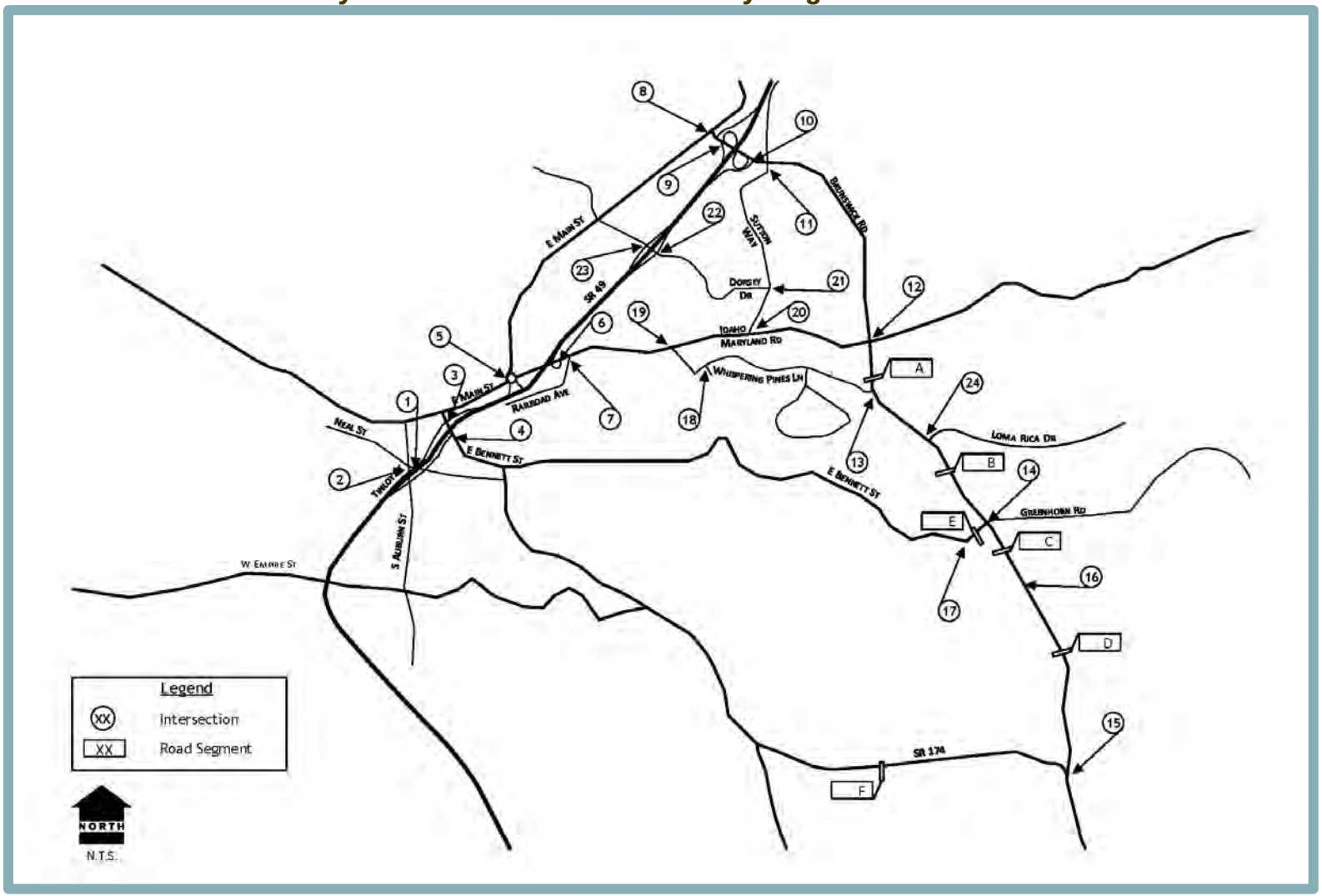
- Total VMT – the sum of VMT for all vehicle trips and trip purposes.
- Residential VMT per capita – the sum of VMT for trips originating from home, divided by the number of residents.
- VMT per worker – the sum of VMT for trips from home to work, divided by the number of workers.

In July 2020, Fehr & Peers prepared Senate Bill 743, Vehicle Miles Traveled Implementation for the Nevada County Transportation Commission (NCTC). The NCTC in turn distributed the document to the various agencies within the County so each agency could develop their own significance threshold guidelines. Fehr & Peers recommends that VMT be expressed as a generation rate rather than a ratio. The County's recommended threshold of significance is on a per service population basis (Nevada County Traffic impact Guidelines, June 2020). Because the proposed project is an industrial land use project, the calculated VMT per employee (worker) is also the VMT per service population ~~County determined that the preferred significance threshold metric shall be VMT per worker (i.e., project employee)~~.

The subareas, based on similar travel characteristics and proximity, are recommended to be the following: the City of Grass Valley; the City of Nevada City; the Town of Truckee; Alta Sierra; Lake of the Pines; Lake Wildwood and Penn Valley; the remainder of western Nevada County; and the remainder of eastern Nevada County. Use of a subarea threshold acknowledges the differences in VMT generation in different parts of Nevada County.

Table 4.12-4 presents the results of the VMT measurement analysis that considers trips from outside the model as well as within the NCTC Travel Demand Model (TDM) ~~from several data sources including the NCTC Travel Demand Model (TDM), the California State Travel Demand Model, and MXD+, a trip generation tool developed by Fehr & Peers.~~ As noted in further detail in the Method of Analysis section below, the data in Table 4.12-4 was used to determine the significance threshold for the proposed project.

Figure 4.12-1
Study Intersection and Roadway Segment Locations



Source: KDAnderson & Associates, Inc., 20221.

Table 4.12-2
Project Traffic Hours Intersection LOS – Existing Conditions

Location - Jurisdiction	Control	6:30 – 7:30 AM		3:30 – 4:30 PM		6:30 – 7:30 PM		Meets Traffic Signal Warrant?
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	8.3	A	6.6	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.1	A	8.7	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.9	A	6.1	A	4.1	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.2	B	14.8	B	10.1	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.5	A	6.6	A	4.3	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~13.5~~14.4	C	~~18.2~~19.3	A	~~9.5~~9.8	No
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~10.7~~11.3	C	~~15.9~~17.1	A	~~8.5~~8.8	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	5.8	B	~~13.3~~14.2	A	~~8.7~~9.1	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~16.6~~15.8	B	~~19.8~~20.2	B	~~16.7~~15.8	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.6~~8.7	B	~~13.2~~13.3	A	~~9.2~~8.8	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~4.8~~4.7	C	~~21.3~~21.2	A	~~9.1~~9.2	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡								
NB Left	EB/WB Stop	A	~~8.0~~8.1	A	9.0	A	8.0	Yes*
SB Left		A	7.8	A	8.8	A	7.8	
EB		B	~~10.3~~10.5	B	~~13.7~~13.9	B	10.6	
WB		C	~~17.1~~17.3	**F**	**70.7**	B	14.6	
13. Brunswick Rd/Whispering Pines Ln ‡								
NB Left	EB Stop	A	8.4	A	9.1	A	8.3	Yes*
EB		B	10.8	B	14.1	B	10.6	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	10.6	C	17.4	B	10.5	Yes*
15. Brunswick Rd/SR 174 †								
SB	SB Stop	B	12.5	**E**	**35.1**	B	12.5	Yes*
EB Left		A	~~7.6~~7.7	A	7.8	A	7.4	
16. Brunswick Rd/Project Driveway †	EB Stop	Not Studied						
17. E. Bennett Rd/Millsite Rd †	NB Stop	Not Studied						

Table 4.12-2
Project Traffic Hours Intersection LOS – Existing Conditions

Location - Jurisdiction	Control	6:30 – 7:30 AM		3:30 – 4:30 PM		6:30 – 7:30 PM		Meets Traffic Signal Warrant?
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
18. Whispering Pines Ln/Centennial Site Driveway ‡	NB Stop	Not Studied						
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	B A	~~11.3~~10.8 ~~8.2~~8.1	**F** A	**59.1** 8.3	B A	10.1 7.6	No
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.1~~8.0	B	~~12.4~~12.5	A	8.0	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.0	B	11.8	A	8.2	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	7.9	B	13.6	A	7.8	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	3.7	A	9.1	A	5.3	N/A
24. Brunswick Road/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~13.9~~14.3	A	~~8.0~~8.1	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~2.

Half of the project is located in the Grass Valley Subarea while half is located in unincorporated Western Nevada County ~~The Grass Valley subarea was used as the basis due to the project's proximity to the City~~.

Table 4.12-4
~~Home-Based VMT per Worker~~ Total VMT per Service Population

Location (SubArea)	NCTC TDM
Grass Valley	~~18.6~~ 28.0
Nevada City	~~26.6~~ 36.2
Truckee	N/A
Alta Sierra	~~27.8~~ 17.1
Lake Wildwood	~~34.3~~ 22.5
Penn Valley	~~18.6~~ 18.8
Lake of the Pines	~~25.0~~ 16.4
Unincorporated Western Nevada County	~~N/A~~ 18.1
Western Nevada County Total	22.2

Source: KDAnderson & Associates, Inc., 2021.

Page 4.12-27 and 4.12-28, DEIR Chapter 4.12, Section 4.12.4, the discussion under the Vehicle Miles Traveled Standard of Significance subheading is hereby revised as follows:

Vehicle Miles Traveled Standard of Significance

For the proposed project, a VMT impact may be considered less than significant if:

- The project's total weekday VMT per service population is equal to or less than 14.3 percent below the subarea mean under baseline conditions, or the project reduces the total VMT per service population for the subarea; and
- The project is consistent with the General Plan and the Nevada County Regional Transportation Plan.

As stated above, because the proposed project is an industrial land use project, the ~~County determined that the preferred significance threshold metric shall be~~ VMT per worker (i.e., project employee) is also the VMT per Service Population. The data in Table 4.12-4 was used to determine the significance threshold for the proposed project. Half of the project is located in the Grass Valley Subarea while half is located in unincorporated Western Nevada County. The subarea mean VMT per service population rates are 28.0 for Grass Valley and 18.1 for unincorporated Western Nevada County. The most conservative approach is to use the unincorporated Western Nevada County ~~Grass Valley~~ subarea ~~was used as the basis due to the project's proximity to the City~~. Therefore, the proposed project would be considered to result in a significant impact related to VMT if the project would result in a VMT per worker ratio that is less than 14.3 percent below the subarea mean for the ~~Grass Valley~~ unincorporated Western Nevada County subarea of 18.~~6~~1.

Pages 4.12-60, 4.12-65, 4.12-71 through 4.12-74, 4.12-76 through 4.12-79, DEIR Chapter 4.12, Section 4.12.4, Tables 4.12-10, 4.12-11, 4.12-14, and 4.12-15 are hereby revised on the following pages.

Pages 4.12-81 through 4.12-83, DEIR Chapter 4.12, Section 4.12.4, the discussion under Impact 4.12-5 is hereby revised as follows:

Table 4.12-10
Project Traffic Hours Intersection LOS – EPAP Plus Project Conditions (Scenario #1)

Location – Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	5.1	A	8.4	A	8.2	A	7.0	A	7.1	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.3	A	6.1	A	8.7	A	8.7	A	6.9	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.8	A	3.8	A	6.4	A	6.3	A	4.2	A	4.0	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.3	A	9.3	B	15.2	B	15.2	B	10.2	B	10.2	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.7	A	4.8	A	6.8	A	7.0	A	4.4	A	4.6	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	~~B~~C	~~14.9~~15.9	C	~~17.2~~18.9	C	~~22.6~~24.4	~~C~~D	~~23.7~~25.7	~~A~~B	~~9.9~~10.2	B	~~10.3~~10.6	Yes*
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.0~~11.4	B	~~11.5~~12.1	C	~~16.5~~17.8	C	~~17.0~~18.4	A	~~8.7~~9.1	A	~~8.9~~9.3	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~5.7	A	5.9	B	~~13.7~~13.6	B	13.4	A	~~9.0~~9.1	A	9.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~15.9~~16.5	B	~~16.8~~16.7	B	~~19.8~~19.5	~~B~~C	~~19.8~~20.5	B	~~16.5~~16.3	B	~~16.9~~17.0	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~9.1~~8.7	A	~~8.7~~8.5	B	~~13.5~~13.4	B	~~13.6~~13.8	A	9.0	A	~~8.9~~9.3	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	5.2	A	~~5.2~~5.0	C	21.5	C	~~22.0~~21.8	A	~~9.5~~9.6	A	~~9.2~~9.4	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡														
NB Left		A	~~8.0~~8.2	A	~~8.2~~8.4	A	~~9.0~~9.1	A	~~9.1~~9.2	A	8.0	A	8.2	
SB Left	EB/WB Stop	A	7.8	A	7.9	A	8.8	A	8.9	A	7.9	A	7.9	Yes*
EB		B	~~10.4~~10.6	B	~~11.3~~11.5	B	~~14.1~~14.2	B	~~14.1~~14.2	B	~~10.7~~10.8	B	~~11.2~~11.3	
WB		C	~~17.9~~18.1	D	~~25.4~~25.8	**F**	**83.7**	**F**	**~~98.2~~102.5**	C	15.3	C	18.3	
13. Brunswick Rd/Whispering Pines Ln ‡														
NB Left	EB Stop	A	8.4	A	8.8	A	9.1	A	9.1	A	8.3	A	8.5	Yes*
EB		B	10.9	B	11.4	B	14.5	B	14.8	B	10.6	B	11.1	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~10.7~~11.0	B	~~12.7~~13.3	C	~~18.5~~19.6	C	~~20.7~~22.0	B	~~10.8~~11.0	B	~~12.4~~12.8	Yes*
15. Brunswick Rd/SR 174 †														
SB	SB Stop	B	12.5	B	~~13.0~~13.1	**E**	**36.3**	**E**	**38.1**	B	12.6	B	13.0	Yes*
EB Left		A	~~7.6~~7.7	A	7.7	A	7.8	A	7.8	A	7.4	A	7.4	
16. Brunswick Rd/Project Driveway †														
NB Left	EB Stop	Not Studied		A	7.8	Not Studied		A	8.4	Not Studied		A	8.2	No
EB				B	11.5			B	12.5			B	11.7	
17. E. Bennett Rd/Millsite Rd †														
NB	NB Stop	Not Studied		A	8.5	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡														
NB	NB Stop	Not Studied		A	9.6	Not Studied		A	9.0	Not Studied		A	8.7	No
WB Left				A	7.8			A	7.5			A	7.4	
19. Idaho Maryland Rd/Centennial Dr ‡														
NB	NB Stop	B	11.3	B	12.2	**F**	**~~99.8~~100.9**	**F**	**112.3**	B	10.2	B	10.8	Yes*
WB Left		A	8.2	A	8.4	A	8.5	A	8.5	A	7.6	A	7.7	
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	8.1	A	8.5	B	~~13.9~~14.0	B	14.3	A	8.1	A	8.5	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.1	A	8.2	C	15.6	C	15.7	A	9.2	A	9.3	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	9.3	A	9.3	B	13.7	B	14.0	A	8.2	A	8.3	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	6.2	A	6.2	B	14.9	B	15.9	A	7.4	A	7.4	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~11.5~~11.7	B	~~14.2~~14.6	B	~~14.7~~15.2	A	~~8.3~~8.4	A	~~8.5~~8.6	N/A

- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-11
Project Traffic Hours Intersection LOS – EPAP Plus Project Conditions (Scenario #2)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		EPAP		EPAP Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	4.8	A	5.0	A	8.4	A	8.6	A	7.0	A	6.8	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	6.3	A	6.2	A	8.7	A	8.6	A	6.9	A	7.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	3.8	A	3.8	A	6.4	A	6.4	A	4.2	A	4.1	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.3	A	9.3	B	15.2	B	15.2	B	10.2	B	10.2	No
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	4.7	A	4.8	A	6.8	A	7.0	A	4.4	A	4.6	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	~~B~~C	~~14.9~~15.9	C	~~17.2~~18.9	C	~~22.6~~24.4	~~C~~D	~~23.7~~25.7	~~A~~B	~~9.9~~10.2	B	~~10.3~~10.6	Yes*
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.0~~11.4	B	~~11.5~~12.1	C	~~16.5~~17.8	C	~~17.0~~18.4	A	~~8.7~~9.1	A	~~8.9~~9.3	No
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~5.7	A	~~6.1~~6.0	B	~~13.7~~13.6	B	~~13.5~~14.3	A	~~9.0~~9.1	A	9.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~15.9~~16.5	B	~~16.8~~16.4	B	~~19.8~~19.5	C	~~20.3~~20.2	B	~~16.5~~16.3	B	~~16.4~~17.1	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~9.1~~8.7	A	~~8.7~~8.8	B	~~13.5~~13.4	B	~~14.0~~14.3	A	9.0	A	~~8.8~~9.2	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	5.2	A	~~5.3~~5.1	C	21.5	C	~~22.1~~22.5	A	~~9.5~~9.6	A	9.6	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡														
NB Left		A	~~8.0~~8.2	A	~~8.2~~8.4	A	~~9.0~~9.1	A	9.2	A	8.0	A	8.2	
SB Left	EB/WB Stop	A	7.8	A	7.9	A	8.8	A	8.9	A	7.9	A	7.9	Yes*
EB		B	~~10.4~~10.6	B	~~11.5~~11.6	B	~~14.1~~14.2	B	~~14.3~~14.4	B	~~10.7~~10.8	B	~~11.3~~11.4	
WB		C	~~17.9~~18.1	D	~~26.7~~26.8	**F**	**83.7**	**F**	**107.3**	C	15.3	C	18.8	
13. Brunswick Rd/Whispering Pines Ln ‡														
NB Left	EB Stop	A	8.4	A	8.8	A	9.1	A	~~9.1~~9.2	A	8.3	A	8.5	Yes*
EB		B	10.9	B	11.5	B	14.5	~~B~~C	~~14.9~~15.0	B	10.6	B	11.2	
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~10.7~~11.0	B	~~12.7~~13.0	C	~~18.5~~19.6	C	~~20.7~~22.0	B	~~10.8~~11.0	B	~~12.4~~12.8	Yes*
15. Brunswick Rd/SR 174 †														
SB	SB Stop	B	12.5	B	13.0	**E**	**36.3**	**E**	**38.1**	B	12.6	B	13.0	Yes*
EB Left		A	~~7.6~~7.7	A	7.7	A	7.8	A	7.8	A	7.4	A	7.4	
16. Brunswick Rd/Project Driveway †														
NB Left	EB Stop	Not Studied		A	7.8	Not Studied		A	8.4	Not Studied		A	8.2	No
EB				B	11.5			B	12.5			B	11.7	
17. E. Bennett Rd/Millsite Rd †														
NB	NB Stop	Not Studied		A	8.5	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡	NB Stop	Not Studied		Not Applicable		Not Studied		Not Applicable		Not Studied		Not Applicable		
19. Idaho Maryland Rd/Centennial Dr ‡														
NB	NB Stop	B	11.3	B	12.2	**F**	**~~99.8~~100.9**	**F**	**112.3**	B	10.2	B	10.8	Yes*
WB Left		A	8.2	A	8.4	A	8.5	A	8.5	A	7.6	A	7.7	
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.1~~8.2	A	8.5	B	~~13.9~~14.0	B	14.3	A	8.1	A	8.5	No
21. Sutton Way/Dorsey Dr ‡	AWS	A	8.1	A	8.2	C	15.6	C	15.7	A	9.2	A	9.3	No
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	9.3	A	9.0	B	13.7	B	13.7	A	8.2	A	8.4	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	6.2	A	6.1	B	14.9	B	15.6	A	7.4	A	7.3	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.8~~12.0	B	~~11.5~~11.7	B	~~14.2~~14.6	B	~~14.7~~15.2	A	~~8.3~~8.4	A	~~8.5~~8.6	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-14
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	67	69	105	103	99	99
WB	150	86	86	139	126	95	92
2. S. Auburn St / Tinloy St							
NB through	80	78	73	115	117	78	73
NB through-left	80	55	53	76	78	53	52
SB	75	78	76	109	109	101	101
WB	95	84	85	99	99	79	75
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	27	28	41	42	31	28
NB through	150	46	45	54	56	47	47
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	38	38	<25	<25
SB through	150	<25	<25	95	95	35	35
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	26	26	<25	<25
SB	---	<25	<25	49	51	<25	<25
EB	---	30	32	63	60	28	29
WB	---	<25	<25	53	53	26	27
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~120~~133	~~163~~183	~~55~~63	~~55~~63	<25	<25
NB left	355	33	~~38~~33	63	63	<25	<25
WB	90	~~30~~33	~~35~~40	~~203~~220	~~220~~240	~~33~~35	~~40~~43
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~75~~80	~~88~~95	~~80~~98	~~83~~100	<25	<25
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~43~~44	~~42~~46	~~119~~122	~~114~~116	~~60~~58	~~55~~60

Table 4.12-14
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB left (2 lanes)	355	~~60~~65	~~66~~71	~~179~~175	~~173~~181	~~99~~105	~~100~~109
WB left (2 lanes)	150	~~45~~40	~~41~~44	~~90~~92	~~88~~87	~~61~~62	~~63~~64
WB right	150	~~54~~49	~~57~~50		~~148~~159	~~71~~77	~~72~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	<25	~~75~~63	~~77~~78	~~57~~55	~~54~~51
NB right	100	~~32~~30	28	~~135~~123	~~131~~134	~~85~~76	82
SB left (2 lanes)	260	~~117~~126	~~125~~135	~~191~~197	~~197~~208	~~136~~138	~~135~~149
SB right	260	47	~~50~~48	~~86~~84	~~79~~84	~~52~~55	~~55~~58
EB	160	~~47~~59	63	~~210~~201	207	~~123~~133	~~135~~137
WB left	145	62	~~62~~64	~~107~~106	~~103~~104	~~89~~90	~~96~~94
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~165~~153	~~159~~152	~~225~~224	221	~~177~~182	~~177~~196
NB right	---	~~93~~113	~~98~~110	~~245~~243	~~250~~252	~~91~~85	~~96~~95
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~56~~53	~~53~~58	~~241~~253	~~247~~259	~~110~~119	~~112~~114
SB left	190	~~43~~42	~~41~~39	~~102~~104	110	~~55~~58	~~57~~56
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~59~~55	~~55~~58	~~124~~133	~~122~~124	~~67~~69	~~64~~66
EB right	250	~~45~~48	~~47~~50	~~150~~157	~~155~~159	~~87~~84	~~82~~89
WB left	125	44	~~44~~40	~~144~~142	~~137~~135	~~69~~72	~~64~~70
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	<25	<25	<25	<25	<25	<25
SB left	120	<25	<25	<25	<25	<25	<25
EB right	---	<25	25	40	40	<25	<25
WB left	60	25	40	68	73	<25	<25
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	<25	<25	<25	<25

Table 4.12-14
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	30	205	215	43	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway							
NB	---	--	<25	---	<25	---	<25
WB left	100	---	<25	---	<25	---	<25
19. Idaho Maryland Rd / Centennial Dr							
NB	---	<25	<25	315	335	<25	<25
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	45	45	<25	<25
SB left	---	<25	<25	<25	<25	<25	<25
ÈB	---	<25	25	98	100	<25	<25
WB	---	<25	<25	63	70	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	38	38	<25	<25
SB thru	---	<25	<25	43	45	<25	<25
NB	---	<25	<25	98	98	<25	<25

Table 4.12-14
EPAP Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB	---	<25	<25	110	110	40	40
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	112	113	104	108	56	60
NB right	215	41	43	98	96	48	51
EB left	180	60	60	155	150	56	66
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	50	50	58	60	48	48
SB left-thru	400	53	52	154	165	67	68
EB right	155	36	40	199	205	41	44
WB left	180	81	81	184	183	84	82
24. Brunswick Rd / Loma Rica Dr							
NB right	410	~~31~~32	~~31~~30	26	26	<25	<25
SB left	400	~~133~~137	~~146~~150	135	135	~~64~~65	~~68~~69
WB left	100	~~32~~33	~~35~~36	~~160~~163	~~160~~163	~~35~~36	38

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-15
EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	67	66	105	103	99	94
WB	150	86	87	139	138	95	89
2. S. Auburn St / Tinloy St							
NB through	80	78	71	115	109	78	76
NB through-left	80	55	52	76	67	53	52
SB	75	78	71	109	104	101	100
WB	95	84	82	99	103	79	75
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	27	27	41	43	31	32
NB through	150	46	45	54	56	47	45
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	38	38	<25	<25
SB through	150	<25	<25	95	95	35	35
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	26	26	<25	<25
SB	---	<25	<25	49	51	<25	<25
EB	---	30	32	63	60	28	29
WB	---	<25	<25	53	53	26	27
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~120~~133	~~163~~183	~~55~~63	~~55~~63	<25	<25
NB left	355	33	33	63	63	<25	<25
WB	90	~~30~~33	~~35~~40	~~203~~220	~~220~~240	~~33~~35	~~40~~43
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~75~~80	~~88~~95	~~80~~98	~~83~~100	<25	<25
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~43~~44	~~39~~43	~~119~~122	~~126~~132	~~60~~58	~~59~~63

Table 4.12-15
EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB left (2 lanes)	355	~~60~~65	~~64~~72	~~179~~175	~~177~~193	~~99~~105	~~99~~104
WB left (2 lanes)	150	~~45~~40	~~36~~46	~~90~~92	88	~~61~~62	~~60~~64
WB right	150	~~54~~49	~~56~~58	~~153~~155	~~149~~163	~~71~~77	~~74~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	~~<25~~26	~~75~~63	~~75~~73	~~57~~55	52
NB right	100	~~32~~30	~~28~~30	~~135~~123	~~129~~131	~~85~~76	~~83~~81
SB left (2 lanes)	260	~~117~~126	~~127~~136	~~191~~197	~~199~~194	~~136~~138	~~143~~149
SB right	260	47	~~50~~53	~~86~~84	~~76~~97	~~52~~55	~~54~~52
EB	160	~~47~~59	~~56~~58	~~210~~201	~~204~~203	~~123~~133	~~128~~129
WB left	145	62	~~63~~57	~~107~~106	~~104~~108	~~89~~90	~~85~~90
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~165~~153	~~160~~165	~~225~~224	~~226~~231	~~177~~182	~~172~~182
NB right	---	~~93~~113	~~100~~113	~~245~~243	~~259~~257	~~91~~85	~~99~~97
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~56~~53	~~52~~57	~~241~~253	~~251~~268	~~110~~119	111
SB left	190	~~43~~42	~~41~~40	~~102~~104	~~105~~99	~~55~~58	~~56~~57
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~59~~55	~~60~~58	~~124~~133	~~128~~124	~~67~~69	~~63~~64
EB right	250	~~45~~48	46	~~150~~157	~~161~~154	~~87~~84	~~86~~80
WB left	125	44	~~45~~46	142	~~147~~152	~~69~~72	~~67~~70
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	<25	<25	<25	<25	<25	<25
SB left	120	<25	<25	<25	<25	<25	<25
EB right	---	<25	25	40	40	<25	<25
WB left	60	25	43	68	75	<25	<25
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25

Table 4.12-15
EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB left	110	<25	<25	<25	<25	<25	<25
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	30	205	215	43	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway **– Not Applicable**							
19. Idaho Maryland Rd / Centennial Dr							
NB	---	<25	<25	315	335	<25	<25
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	45	45	<25	<25
SB left	---	<25	<25	<25	<25	<25	<25
ÈB	---	<25	25	98	100	<25	<25
WB	---	<25	<25	63	70	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	38	38	<25	<25
SB thru	---	<25	<25	43	45	<25	<25
NB	---	<25	<25	98	98	<25	<25

Table 4.12-15
EPAP Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB	---	<25	<25	110	110	40	40
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	112	107	104	113	56	59
NB right	215	41	41	98	99	48	54
EB left	180	60	62	155	157	56	65
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	50	50	58	57	48	49
SB left-thru	400	53	57	154	151	67	69
EB right	155	36	39	199	196	41	41
WB left	180	81	77	184	179	84	84
24. Brunswick Rd / Loma Rica Dr							
NB right	410	~~31~~32	~~31~~30	26	26	<25	<25
SB left	400	~~133~~137	~~146~~150	135	135	~~64~~65	69~~68~~
WB left	100	~~32~~33	~~35~~36	~~160~~163	~~160~~163	~~35~~36	38

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Because the proposed project is an industrial land use project, the ~~County determined that the preferred significance threshold metric shall be~~ VMT per worker (i.e., project employee) is the VMT per service population. The ~~Grass Valley~~ unincorporated Western Nevada County subarea was used as the basis ~~due to the project's proximity to the City~~ as a conservative approach. As shown in Table 4.12-4, the ~~Grass Valley~~unincorporated Western Nevada County subarea has an associated ~~home-based~~ VMT per ~~worker~~ service population of 18.~~6~~1. As shown in Table 4.12-16 ~~on a per worker basis~~, the proposed project is modeled to generate a daily rate per service population (employee) of ~~13.9~~ 14.4 VMT (~~under 2035 Plus Project Conditions~~ in the 2020 base year), which is more than 14.3 percent below the ~~Grass Valley~~ unincorporated area metric of 18.~~6~~1 VMT per worker. Therefore, the proposed project would result in a reduced VMT per service population for the applicable subarea.

Table 4.12-16
Rise Grass Valley Project Generated VMT Summary

Metric	~~2035 Future Year~~ 2020 Base Year
~~Total Daily Project VMT~~	~~1,538~~
~~Maximum Employees on Site (including Centennial employees)~~	~~111~~
Daily VMT per ~~Employee~~ Service Population	~~13.9~~ 14.4
Source: ~~Fehr & Peers~~ KD Anderson, 2020~~2~~.	

In addition, because the proposed project is anticipated to employ approximately 312 direct employees during full operations, pursuant to Section L-II 4.1.9 of the Nevada County LUDC, the project applicant would be required to submit a detailed analysis of transportation alternatives, documenting feasible measures for reducing auto dependence.

Although the overall project site is not currently served by transit and the Nevada County Transit Services Division does not have plans to bring service to the project area, the nearest bus route to either the Brunswick Industrial Site or Centennial Industrial Site is Route #3, which operates between the Tinloy Street/Bank Street Transit Center and the Nevada County Airport and passes directly by the Centennial Industrial Site. The proposed project would incorporate an area for bicycle racks at the Brunswick Industrial Site, which would provide a minimum of 11 racks (44 bicycle spaces). Pursuant to Nevada County LUDC, additional potential transportation reduction alternatives for the proposed project were identified in the Traffic Impact Analysis prepared for the proposed project, based on the Transportation Demand Management strategies included in the Vehicle Miles Traveled Implementation report prepared by Fehr & Peers for the NCTC, and include the following:

- **Commute Trip Reduction, #3.4.11, TRT-11: Provide Employer-Sponsored Vanpool/Shuttle:** This strategy would make a company sponsored vanpool/shuttle available to allow employees to commute in a single vehicle. Because employees of the proposed project are likely to be coming from throughout the area, the use of specific locations for pick up, such as existing Park-and-Ride lots in the County, would facilitate the reduction of commute vehicles.

- The proposed project could also institute a shuttle service between the project site(s) and the Tinloy Street/Bank Street Transit Center to provide a convenient location for employees to transfer from public transit or to be dropped off. A shuttle could operate several times each day, during the 7:00 AM and 7:00 PM shift changes and at the end of the administrative workday, after 3:30 PM.

- **Commute Trip Reduction, #3.4.3, TRT-3: Provide Ride-Sharing Programs:** This strategy involves the employer providing ride-share coordination and parking facilities

to provide information for employees to ride share to and from work. This strategy is intended to match employees by location resulting in a reduction of commute vehicles. Rideshare activities would provide incentives for employees commuting to and from the site. Ridesharing could be coordinated between employees along a similar route from their residence to the work site. The use of existing Park-and-Ride lots may provide a location for employees to meet and commute together, reducing the number of vehicles in the roadway network. Three Caltrans Park-and-Ride locations exist in Nevada County, two in Penn Valley and one in Grass Valley; all are located along SR 20. A Park-and-Ride location also exists in Auburn for employees commuting along SR 49 from Placer County. Incentives may include the use of high-occupancy vehicle (HOV) lanes, less maintenance on a single vehicle due to reduced use, and cost sharing between employees/employer.

Given that the proposed project would result in a VMT per ~~worker~~ service population ratio that is greater than 14.3 percent below the subarea mean for the ~~Grass Valley~~ unincorporated Western Nevada County subarea of 18.~~6~~1, impacts associated with a conflict or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b), would be ***less than significant***.

Mitigation Measure(s)

None required.

Page 4.12-91, DEIR Chapter 4.12, Impact 4.12-6, Mitigation Measure 4.12-6(b), is hereby revised to make minor changes based on further County input.

4.12-6(b) *Prior to ~~commencement of engineered fill~~ any hauling of project materials (e.g., engineered fill, soil, rocks, etc.) on County or City roads, the project applicant shall enter into separate road maintenance agreements with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between project driveway and Brunswick Road.*

The above minor changes are not substantive and do not change the efficacy of the mitigation measure.

Pages 4.12-97, 4.12-102, 4.12-108 through 4.12-111, and 4.12-112 through 4.12-115, DEIR Chapter 4.12, Section 4.12.4, Tables 4.12-18, 4.12-19, 4.12-22, and 4.12-23 are hereby revised on the following pages.

The foregoing revisions to Chapter 4.12, Transportation, do not change the conclusions of the analysis in the DEIR. The revisions do not trigger any of the criteria set forth in CEQA Guidelines Section 15088.5(a) necessitating the recirculation of a DEIR subsequent to public review. The revisions correct errors and/or provide additional clarification to information and analysis already conveyed.

Table 4.12-18
Project Traffic Hours Intersection LOS – Cumulative Plus Project Conditions (Scenario #1)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	6.7	A	6.9	A	9.0	A	9.0	B	11.7	B	12.2	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	7.2	A	7.1	A	9.9	A	9.5	A	9.0	A	9.1	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	4.1	A	4.1	A	8.0	A	7.6	A	4.4	A	4.5	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.6	A	9.6	C	18.3	C	18.3	B	10.7	B	10.8	Yes*
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	5.1	A	5.3	A	8.3	A	8.4	A	4.9	A	5.1	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~12.7~~13.5	B	13.3	~~B~~C	~~19.4~~22.7	B	19.6	B	~~11.9~~12.1	B	12.0	N/A
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.5~~11.9	B	11.7	~~B~~C	~~19.3~~24.0	B	19.4	B	~~12.2~~12.8	B	12.4	N/A
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~6.3	A	6.2	B	~~14.0~~14.6	B	14.2	A	~~9.8~~9.9	A	9.7	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~17.1~~17.6	B	18.1	B	~~16.9~~17.2	B	17.2	B	~~16.1~~16.3	B	16.4	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.3~~8.2	A	8.4	B	14.9	B	14.8	A	~~8.9~~8.6	A	8.7	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~5.3~~5.5	A	5.2	C	~~28.2~~28.9	C	30.2	B	~~10.7~~10.3	B	10.5	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡ NB Left SB Left EB WB	EB/WB Stop	B	~~17.3~~17.8	B	18.5	C	~~31.6~~32.8	C	32.5	B	~~18.1~~18.2	B	18.7	N/A
13. Brunswick Rd/Whispering Pines Ln ‡ NB Left EB	EB Stop	A B	8.4 11.0	A B	8.7 11.4	A C	9.4 19.3	A C	9.4 19.9	A B	~~8.3~~8.4 11.0	A B	8.5 11.3	Yes*
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~11.0~~11.3	B	13.0	~~C~~D	~~23.7~~25.6	D	27.2	B	~~10.9~~11.2	B	12.6	Yes*
15. Brunswick Rd/SR 174 † SB EB Left	SB Stop	A B	~~7.7~~7.8 ~~12.8~~12.9	A B	7.8 13.4	A **E**	7.8 **46.2**	A **E**	7.8 **48.9**	A C	~~8.2~~7.4 ~~17.5~~12.7	A B	7.4 13.1	Yes*
16. Brunswick Rd/Project Driveway † NB Left EB	EB Stop	Not Studied		A B	7.8 11.4	Not Studied		A B	8.5 12.9	Not Studied		A B	8.1 12.2	Yes*
17. E. Bennett Rd/Millsite Rd † NB	NB Stop	Not Studied		A	8.6	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡ NB WB Left	NB Stop	Not Studied		A A	9.7 7.8	Not Studied		A A	9.1 7.5	Not Studied		A A	8.7 7.4	No
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	A	~~6.7~~6.8	A	6.6	B	11.5	B	11.5	A	7.5	A	7.4	N/A
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.0~~8.1	A	8.4	B	14.2	B	14.5	A	7.9	A	8.1	Yes*
21. Sutton Way/Dorsey Dr ‡	AWS	A	9.0	A	9.1	**F**	**213.1**	**F**	**214.3**	B	10.4	B	10.5	Yes*
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	8.9	A	8.6	B	14.8	B	15.0	A	8.7	A	8.9	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	5.6	A	5.5	B	17.6	B	16.9	A	8.2	A	8.4	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.9~~12.1	B	11.6	B	~~14.8~~15.3	B	15.5	A	~~8.1~~8.2	A	8.2	N/A

- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-19
Project Traffic Hours Intersection LOS – Cumulative Plus Project Conditions (Scenario #2)

Location - Jurisdiction	Control	6:30 – 7:30 AM				3:30 – 4:30 PM				6:30 – 7:30 PM				Meets Traffic Signal Warrant?
		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		Cumulative No Project		Cumulative Plus Project		
		LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	LOS	Average Delay (veh/sec)	
1. Neal St/Tinloy St ‡	Signal	A	6.7	A	7.2	A	9.0	A	9.7	B	11.7	B	12.4	N/A
2. S. Auburn St/Tinloy St ‡	Signal	A	7.2	A	7.2	A	9.9	B	10.0	A	9.0	A	9.0	N/A
3. E. Bennett Rd/Tinloy St/SR 49 WB Off-Ramp ‡	SB/WB Stop	A	4.1	A	4.0	A	8.0	A	7.6	A	4.4	A	4.5	Yes*
4. E. Bennett Rd/Hansen Way/SR 49 EB On-Ramp ‡	AWS	A	9.6	A	9.6	C	18.3	C	18.3	B	10.7	B	10.8	Yes*
5. Main St/Idaho Maryland Rd/SR 49 WB Ramps ‡	Roundabout	A	5.1	A	5.3	A	8.3	A	8.4	A	4.9	A	5.0	N/A
6. Idaho Maryland Rd/SR 49 EB Ramps ‡	AWS	B	~~12.7~~13.5	B	~~13.3~~14.3	~~B~~C	~~19.4~~22.7	~~B~~C	~~19.6~~23.1	B	~~11.9~~12.1	B	~~12.0~~12.3	N/A
7. Idaho Maryland Rd/Railroad Ave ‡	AWS	B	~~11.5~~11.9	B	~~11.7~~12.1	~~B~~C	~~19.3~~24.0	~~B~~C	~~19.4~~24.3	B	~~12.2~~12.8	B	~~12.4~~13.0	N/A
8. Main St/Brunswick Rd/W. Olympia Dr ‡	Signal	A	~~6.1~~6.3	A	~~6.5~~6.2	B	~~14.0~~14.6	B	~~14.3~~14.1	A	~~9.8~~9.9	B	~~10.2~~10.0	N/A
9. Brunswick Rd/SR 49 WB Off-Ramp/Maltman Dr ‡	Signal	B	~~17.1~~17.6	B	~~17.7~~17.9	B	~~16.9~~17.2	B	~~17.8~~17.1	B	~~16.1~~16.3	B	~~16.4~~16.0	N/A
10. Brunswick Rd/SR 49 EB Ramps ‡	Signal	A	~~8.3~~8.2	A	~~8.2~~7.8	B	14.9	B	~~14.9~~15.0	A	~~8.9~~8.6	A	~~8.7~~8.9	N/A
11. Brunswick Rd/Sutton Way ‡	Signal	A	~~5.3~~5.5	A	~~5.3~~5.1	C	~~28.2~~28.9	C	~~30.0~~29.9	B	~~10.7~~10.3	B	~~10.7~~10.6	N/A
12. Brunswick Rd/Idaho Maryland Rd ‡ NB Left SB Left EB WB	EB/WB Stop	B	~~17.3~~17.8	B	~~18.5~~19.2	C	~~31.6~~32.8	C	~~33.0~~34.3	B	~~18.1~~18.2	B	~~18.8~~19.0	N/A
13. Brunswick Rd/Whispering Pines Ln ‡ NB Left EB	EB Stop	A B	~~8.4~~8.5 11.0	A B	8.7 11.6	A C	9.4 19.3	A C	~~9.4~~9.5 20.0	A B	~~8.3~~8.4 11.0	A B	8.5 ~~11.3~~11.4	Yes*
14. Brunswick Rd/E. Bennett Rd/Greenhorn Rd †	AWS	B	~~11.0~~11.3	B	13.0	~~C~~D	~~23.7~~25.6	D	~~27.2~~29.4	B	~~10.9~~11.2	B	~~12.6~~13.0	Yes*
15. Brunswick Rd/SR 174 † SB EB Left	SB Stop	A B	~~7.7~~7.8 ~~12.8~~12.9	A B	7.8 ~~13.4~~13.0	A **E**	7.8 **46.2**	A **E**	7.8 **48.9**	A C	~~8.2~~7.4 ~~17.5~~12.7	A B	7.4 13.1	Yes*
16. Brunswick Rd/Project Driveway † NB Left EB	EB Stop	Not Studied		A B	7.8 11.4	Not Studied		A B	8.5 12.9	Not Studied		A B	8.1 12.2	Yes*
17. E. Bennett Rd/Millsite Rd † NB	NB Stop	Not Studied		A	8.6	Not Studied		A	8.7	Not Studied		A	8.6	No
18. Whispering Pines Ln/Centennial Industrial Site Driveway ‡	NB Stop	Not Studied		Not Applicable		Not Studied		Not Applicable		Not Studied		Not Applicable		
19. Idaho Maryland Rd/Centennial Dr ‡ NB WB Left	NB Stop	A	~~6.7~~6.8	A	~~6.6~~6.7	B	~~11.5~~11.8	B	~~11.5~~11.8	A	7.5	A	~~7.4~~7.5	N/A
20. Idaho Maryland Rd /Sutton Way ‡	AWS	A	~~8.0~~8.1	A	~~8.4~~8.5	B	14.2	B	14.5	A	7.9	A	8.1	Yes*
21. Sutton Way/Dorsey Dr ‡	AWS	A	9.0	A	9.1	**F**	**213.1**	**F**	**214.3**	B	10.4	B	10.5	Yes*
22. Dorsey Dr/SR 49 EB Ramps ‡	Signal	A	8.9	A	8.7	B	14.8	B	15.3	A	8.7	A	9.3	N/A
23. Dorsey Dr/SR 49 WB Ramps ‡	Signal	A	5.6	A	5.8	B	17.6	B	17.6	A	8.2	A	8.5	N/A
24. Brunswick Rd/Loma Rica Dr †	Signal	B	~~11.9~~12.1	B	~~11.6~~11.8	B	~~14.8~~15.3	B	~~15.5~~16.0	A	~~8.1~~8.2	A	~~8.2~~8.4	N/A

Notes:
- AWS = all way stop
- † = Nevada County jurisdiction
- ‡ = Grass Valley jurisdiction
- **Bold** indicates intersection operates below the applicable threshold of significance
- * = meets warrant in 3:30 PM hour

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-22
Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	84	80	116	115	119	120
WB	150	115	103	106	109	131	140
2. S. Auburn St / Tinloy St							
NB through	80	73	75	137	136	98	102
NB through-left	80	44	45	63	66	44	44
SB	75	86	84	139	134	123	133
WB	95	68	70	113	113	103	101
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	28	28	41	40	33	34
NB through	150	46	44	66	64	46	49
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	40	40	<25	<25
SB through	150	<25	<25	145	145	45	45
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	32	32	<25	<25
SB	---	<25	<25	70	72	25	25
EB	---	39	41	86	88	34	36
WB	---	<25	<25	66	68	32	33
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~39~~40	~~51~~53	~~48~~50	~~48~~50	<25	<25
NB left	355	~~81~~86	~~87~~92	~~151~~152	~~151~~152	~~5~~520	~~52~~53
WB	90	~~61~~65	~~68~~74	~~260~~276	~~266~~300	74~~72~~	~~78~~81
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~123~~134	~~136~~150	~~166~~181	~~166~~181	51~~47~~	57~~53~~
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~42~~44	~~43~~46	~~130~~133	~~139~~135	~~59~~65	~~62~~61
SB left (2 lanes)	355	~~68~~67	~~67~~65	~~175~~180	~~176~~175	~~106~~102	~~109~~106

Table 4.12-22
Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
WB left (2 lanes)	150	~~43~~44	44	~~97~~104	~~102~~98	67~~75~~	~~71~~69
WB right	150	~~47~~52	~~51~~56	149	~~159~~152	79~~69~~	~~74~~82
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	~~28~~29	~~68~~76	~~66~~71	53~~54~~	~~53~~52
NB right	100	~~30~~32	~~30~~29	~~131~~122	~~117~~118	91~~84~~	~~85~~76
SB left (2 lanes)	260	~~134~~144	~~142~~148	~~148~~150	~~151~~149	144~~140~~	~~133~~139
SB right	260	~~45~~49	~~46~~44	84	86	52~~54~~	~~56~~51
EB	160	~~61~~60	65	~~202~~199	~~203~~201	~~128~~133	~~141~~139
WB left	145	~~61~~66	~~61~~58	~~106~~108	~~106~~105	92~~90~~	~~93~~95
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~141~~147	~~152~~151	~~215~~223	~~218~~224	~~180~~173	~~177~~179
NB right	---	~~106~~115	~~102~~117	~~262~~261	~~258~~254	95~~110~~	~~97~~103
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~58~~60	~~55~~61	~~435~~467	~~545~~511	~~141~~146	~~136~~150
SB left	190	~~38~~37	37	~~115~~113	~~110~~101	51~~52~~	57
SB right	180	---	---	---	<25	---	---
EB left (2 lanes)	185	~~61~~57	~~53~~58	~~127~~147	~~138~~137	70~~66~~	~~63~~69
EB right	250	~~52~~53	~~50~~51	~~224~~215	~~220~~222	~~98~~104	~~96~~114
WB left	125	~~48~~49	~~49~~47	~~177~~170	~~179~~182	74~~84~~	~~79~~77
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	~~90~~92	~~108~~112	~~151~~152	~~166~~170	56	~~76~~77
SB left	120	<25	<25	188	188	~~103~~104	~~106~~108
EB left	150	34	25	74	74	39	~~39~~40
WB left	175	~~100~~104	~~99~~101	68	68	43	~~43~~44
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	58	60	<25	<25
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25

Table 4.12-22
Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	28	248	260	45	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway							
NB	---	---	<25	---	<25	---	<25
WB left	100	---	<25	---	<25	---	<25
19. Idaho Maryland Rd / Centennial Dr							
NB	---	~~28~~29	29	~~285~~302	~~285~~302	29	30
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	48	48	<25	<25
SB left	---	<25	<25	35	35	<25	<25
ÈB	---	<25	<25	105	105	<25	<25
WB	---	<25	<25	55	60	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	28	28	<25	<25
SB thru	---	<25	<25	190	190	<25	<25
NB	---	30	30	1333	1340	58	60
EB	---	25	25	188	188	<25	25
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	98	103	125	120	58	54
NB right	215	59	57	97	100	62	59
EB left	180	63	60	180	177	65	67

Table 4.12-22
Cumulative Plus Project Queues (Scenario #1)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	53	52	63	64	49	49
SB left-thru	400	43	42	165	162	64	67
EB right	155	41	44	218	217	40	42
WB left	180	73	74	253	250	108	111
24. Brunswick Rd / Loma Rica Dr							
NB right	410	32	~~32~~31	27	27	<25	<25
SB left	400	~~134~~137	~~146~~151	~~147~~148	~~147~~148	~~69~~70	~~74~~75
WB left	100	~~35~~36	38	178	178	~~33~~7	~~38~~39

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Highlighted values indicate queue length in excess of available storage with more than 25-foot increase from No Project condition.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

Table 4.12-23
Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
1. Neal St / Tinloy St							
EB	70	84	86	116	117	119	118
WB	150	115	116	106	110	131	144
2. S. Auburn St / Tinloy St							
NB through	80	73	76	137	144	98	97
NB through-left	80	44	46	63	69	44	45
SB	75	86	84	139	137	123	129
WB	95	68	69	113	117	103	93
3. E. Bennett Rd / Tinloy St – SR 49 WB Off-Ramp							
NB left turn	60	28	26	41	40	33	34
NB through	150	46	47	66	64	46	48
4. E. Bennett Rd / Hansen Way – SR 49 EB On-Ramp							
SB left turn	60	<25	<25	40	40	<25	<25
SB through	150	<25	<25	145	145	45	45
5. E. Main St / Idaho Maryland Rd - SR 49 WB Ramps							
NB	---	<25	<25	32	32	<25	<25
SB	---	<25	<25	70	71	25	25
EB	---	39	41	86	88	34	34
WB	---	<25	<25	66	67	32	32
6. Idaho Maryland Rd / SR 49 EB Ramps							
NB right	---	~~39~~40	~~51~~53	~~48~~50	~~48~~50	<25	<25
NB left	355	~~81~~86	~~87~~92	~~151~~152	~~151~~152	~~50~~52	~~52~~53
WB	90	~~61~~65	~~68~~74	~~260~~276	~~266~~300	~~72~~74	~~78~~81
7. Idaho Maryland Rd / Railroad Ave							
EB	90	~~123~~134	~~136~~150	~~166~~181	~~166~~181	~~47~~51	~~53~~57
8. E. Main St / Brunswick Rd – W. Olympia Dr							
NB left	110	<25	<25	<25	<25	<25	<25
NB right	125	~~42~~44	~~43~~45	~~130~~133	~~134~~136	~~59~~65	~~70~~68

Table 4.12-23
Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB left (2 lanes)	355	~~68~~67	~~66~~73	~~175~~180	~~177~~173	~~106~~102	~~117~~116
WB left (2 lanes)	150	~~43~~44	~~47~~46	~~97~~104	~~106~~100	~~75~~67	~~73~~71
WB right	150	~~47~~52	~~55~~58	~~149~~149	~~155~~168	~~69~~79	~~73~~81
9. Brunswick Rd / SR 49 WB Off-Ramp – Maltman Dr							
NB left	100	<25	<25	~~68~~76	69~~70~~	~~54~~53	~~51~~52
NB right	100	~~30~~32	~~30~~28	~~131~~122	~~128~~121	~~84~~91	~~83~~78
SB left (2 lanes)	260	~~134~~144	~~144~~151	~~148~~150	~~149~~158	~~140~~144	~~140~~147
SB right	260	~~45~~49	~~50~~46	84	~~86~~82	~~54~~52	52
EB	160	~~61~~60	~~62~~68	~~202~~199	~~205~~204	~~128~~133	~~139~~147
WB left	145	~~61~~60	~~65~~60	~~106~~108	~~107~~108	~~90~~92	~~89~~94
10. Brunswick Rd / SR 49 EB Ramps							
NB left	200	~~141~~147	~~153~~137	~~215~~223	~~225~~230	~~180~~173	179
NB right	---	~~106~~115	~~94~~103	~~262~~261	~~259~~263	~~110~~95	~~96~~98
11. Brunswick Rd / Sutton Way							
NB left (2 lanes)	280	~~58~~60	~~56~~55	~~435~~467	~~490~~507	~~141~~146	~~139~~140
SB left	190	~~38~~37	39	~~115~~113	~~113~~116	~~52~~51	54
SB right	180	---	---	---	---	---	---
EB left (2 lanes)	185	~~61~~57	~~60~~57	~~127~~147	134	~~66~~70	62
EB right	250	~~52~~53	50	~~224~~215	~~208~~224	~~98~~104	95
WB left	125	~~48~~49	~~47~~50	~~177~~170	~~181~~180	~~84~~74	79
12. Brunswick Rd / Idaho Maryland Rd							
NB left	540	~~90~~92	~~108~~113	~~151~~152	~~166~~170	56	77
SB left	120	<25	<25	188	188	~~103~~104	~~107~~109
EB left	150	34	<25	74	74	39	~~39~~40
WB left	175	~~100~~104	~~99~~102	68	68	43	44

Table 4.12-23
Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
13. Brunswick Rd / Whispering Pines Ln							
NB left	210	<25	<25	<25	<25	<25	<25
EB left	110	<25	<25	58	60	<25	<25
14. Brunswick Rd / E. Bennett Rd – Greenhorn Rd							
NB left	225	<25	<25	<25	<25	<25	<25
SB left	260	<25	<25	<25	<25	<25	<25
EB	---	<25	<25	<25	<25	<25	<25
WB	---	<25	<25	<25	<25	<25	<25
15. Brunswick Rd / SR 174							
SB left	90	25	28	248	260	45	48
EB left	130	<25	<25	<25	<25	<25	<25
16. Brunswick Rd / Project Driveway							
NB left	350	---	<25	---	<25	---	<25
EB	---	---	<25	---	<25	---	<25
17. E. Bennett Rd / Millsite Rd							
NB right	---	---	<25	---	<25	---	<25
18. Whispering Pines Ln / Project Driveway – Not Applicable							
19. Idaho Maryland Rd / Centennial Dr							
NB	---	~~28~~29	29	~~285~~302	~~285~~302	29	30
WB left	130	<25	<25	<25	<25	<25	<25
20. Idaho Maryland Rd /Sutton Way							
SB right	90	<25	<25	48	48	<25	<25
SB left	---	<25	<25	35	35	<25	<25
ÈB	---	<25	<25	105	105	<25	<25
WB	---	<25	<25	55	60	<25	<25
21. Sutton Way / Dorsey Dr							
SB right	120	<25	<25	28	28	<25	<25

Table 4.12-23
Cumulative Plus Project Queues (Scenario #2)

Location	Length*	No Project EPAP 6:30 – 7:30 AM Queue (feet)	Plus Project EPAP 6:30 – 7:30 AM Queue (feet)	No Project EPAP 3:30 – 4:30 PM Queue (feet)	Plus Project EPAP 3:30 – 4:30 PM Queue (feet)	No Project EPAP 6:30 – 7:30 PM Queue (feet)	Plus Project EPAP 6:30 – 7:30 PM Queue (feet)
SB thru	---	<25	<25	190	190	<25	<25
NB	---	30	30	1333	1340	58	60
EB	---	25	25	188	188	<25	25
22. Dorsey Dr / SR 49 EB Ramps							
NB Left (2 lanes)	215	98	101	125	128	58	52
NB right	215	59	60	97	101	62	63
EB left	180	63	63	180	174	65	75
23. Dorsey Dr / SR 49 EB Ramps							
SB right	400	53	52	63	59	49	49
SB left-thru	400	43	38	165	161	64	69
EB right	155	41	42	218	220	40	49
WB left	180	73	76	253	249	108	114
24. Brunswick Rd / Loma Rica Dr							
NB right	410	32	~~32~~31	27	27	<25	<25
SB left	400	~~134~~137	~~146~~151	~~147~~148	148~~14~~	~~69~~70	~~74~~75
WB left	100	~~35~~36	38	178	178	~~36~~37	~~38~~39

Notes:

- Highlighted values indicate queue length in excess of available storage.
- Highlighted values indicate queue length in excess of available storage with more than 25-foot increase from No Project condition.
- Queuing distances based on stochastic modeling.
- * indicates longest lane for multiple turn lane approaches.

Source: KDAnderson & Associates, Inc., 2022~~1~~.

7 References

DEIR Chapter 7, is hereby revised to include the following additional citations:

U.S. Fish and Wildlife Service (USFWS). 1992. Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls.

State of California. 2009. Addendum and Final Initial Study and Mitigated Negative Declaration Osborne Hill Trail Network Project State Clearinghouse #2008112086 (within the Empire Mine State Historic Park). Department of Parks and Recreation, Sacramento, California (January 2009).

Roberts, S.L. 2017. Chapter 3: California Spotted Owl Habitat Characteristics and Use. In USDA Forest Service General Technical Report PSW-GTR-254: The California Spotted Owl Current State of Knowledge.

The foregoing revisions to Chapter 7, Reverences, do not change the conclusions of the analysis in the DEIR.

4. Mitigation Monitoring and Reporting Program

4. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a "mitigated negative declaration" or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. The intent of the MMRP is to ensure implementation of the mitigation measures identified within the EIR for the proposed project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR prepared for the proposed project. This MMRP is intended to be used by Nevada County staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by Nevada County. The table attached to this report identifies the mitigation measures, the monitoring action for each mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The County will be responsible for monitoring compliance.

4.3 MITIGATION MONITORING AND REPORTING PROGRAM

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

The table also includes a list of the Conditions of Approval (COAs) referenced within Chapter 2, Responses to Comments, of this EIR that will be required of the proposed project, as well as the monitoring agency, implementation schedule, and an area for sign-off indicating compliance for each COA. The COAs included in this chapter are not exhaustive; a complete list of COAs will be included in the staff report prepared for the proposed project.

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
4.1 Aesthetics					
4.1-2	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway; in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point) or, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.	*4.1-2* *In conjunction with submittal of Improvement Plans, the applicant shall submit a final Landscape Plan, prepared by a licensed landscape contractor, landscape architect, landscape designer, or horticulturist, for review and approval by the Nevada County Planning Department. The final Landscape Plan shall include the information identified in Nevada County Land Use and Development Code Sec L-II 4.2.7(E), such as:* • *all details depicted on the Preliminary plans and any modifications or additions included by conditions of approval;* • *location of all required plant materials, evenly dispersed within each required planting area;* • *legend listing the type, number, and size of plant materials, indicating both the required number and provided number, of each plant type;* • *irrigation plan;* • *if existing landscaping, including native vegetation, is to be retained, a note shall be provided on the plan stating that "any existing landscaping or native vegetation shown on the approved plan for retention, that is damaged or*	Nevada County Planning Department	In conjunction with submittal of Improvement Plans	

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		removed during construction, shall be repaired or replaced in kind with equivalent size"; • *A Note on the Plan, certified by a Licensed Landscape Architect, Landscape Designer or Horticulturist, that trees are located on the Plan so as to cover 40% of the parking area with tree canopies within 15 years, consistent with Section 4.2.7.2.g of the Nevada County LUDC;* • *Assurance that the property owner will be responsible for the replacement of landscaping that does not survive or that deteriorates due to neglect;* • *All required trees shall be a minimum 15-gallon container size, with the trunk diameter no less than 1.5 inches for canopy trees, and 1-1.5 inches for understory trees, with the following exception: trees planting along project frontages for screening purposes shall include a mix of 15-gallon and 24-gallon trees. Shrubs shall be a minimum 5-gallon container size, and live groundcover plants shall cover bare ground.* • *Varied tree and plant materials shall be used throughout the parking lot. No one species shall comprise more than 75% of the plantings within each of the following categories: canopy tree, understory tree and*			

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		shrubs. Native vegetation shall be included in all required plantings unless confirmed by a licensed Landscape Architect that a native species will not satisfy a specific requirement; • *Planting areas within paved parking lots shall be separated from vehicular areas and street right-of-way by a permanently installed concrete or wooden perimeter curb at least 6" high and meet other requirements in Section 4.2.7.2.g.*			
4.1-4	Long-term changes in visual character associated with the proposed project in combination with cumulative development.	*Implement Mitigation Measure 4.1-2.*	See Mitigation Measure 4.1-2	See Mitigation Measure 4.1-2	
4.3 Air Quality, Greenhouse Gas Emissions, and Energy					
4.3-1	Conflict with or obstruct implementation of the applicable air quality plan.	*4.3-1(a) Prior to the initiation of construction, the following requirements shall be noted on project improvement plans. Improvements plans shall be submitted to the Nevada County Planning Department for review and approval.* ***Mitigations for Use During Construction:*** *The following measures are from the Northern Sierra Air Quality Management District and are based on the significance threshold level of emissions.*	Nevada County Planning Department	Prior to the initiation of construction and noted on Improvement Plans	

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		For all Significance Level Thresholds (A, B, and C) *a. Alternatives to open burning of vegetative material shall be used unless deemed infeasible by the Northern Sierra Air Quality Management District. Among suitable alternatives are chipping, mulching, or conversion to biomass fuel.* *b. Grid power shall be used (as opposed to diesel generators) for job site power needs where feasible during construction.* ***Additional Measures for Emissions at Level B Thresholds:*** *c. All controls discussed above (a and b) shall be implemented.* *d. Temporary traffic control shall be provided during all phases of the construction to improve traffic flow as deemed appropriate by the local transportation agencies and/or the California Department of Transportation.* *e. Construction activities shall be scheduled to direct traffic flow to off-peak hours as much as practicable.*			

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		4.3-1(b) ***Construction Exhaust Emissions Minimization Plan.*** *Prior to the initiation of construction, Rise Grass Valley Inc. or its designee shall submit a Construction Exhaust Emissions Minimization Plan to Nevada County or its designated representative for review and approval. The Construction Exhaust Emissions Minimization Plan shall detail project compliance with the following requirements:* • *Where access to alternative sources of power and alternative-fueled equipment are available, portable diesel engines shall be prohibited.* • *All diesel-powered equipment with engines equal to or greater than 50 horsepower (hp) shall be powered by California Air Resources Board (CARB) certified Tier 4 Final engines. If 50 hp or greater engines that comply with Tier 4 Final emissions standards are not commercially available, then the project applicant shall ensure that all diesel-powered equipment equal to or greater than 25 hp shall have at least CARB-certified Tier 3 engines with the most effective Verified Diesel Emission Control Strategies available for the engine type, such as Level 3 Diesel Particulate Filters*	Nevada County Planning Department	Prior to the initiation of construction	

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project						
Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			(Tier 4 engines automatically meet this requirement). *a. For purposes of this mitigation measure, "commercially available" shall mean the availability of the Tier 4 Final equipment.* *b. The project applicant shall maintain and submit records to Nevada County concerning its efforts to comply with this requirement.*			
4.3-2	Expose sensitive receptors to substantial pollutant concentrations.	*4.3-2*	***Asbestos Dust Mitigation Plan.*** *Prior to the initiation of any clearing, grading, or construction activities, Rise Grass Valley Inc. shall submit an Asbestos Dust Mitigation Plan (ADMP) to Northern Sierra Air Quality Management District (NSAQMD) for review and approval. The provisions of the ADMP shall be initiated at the beginning of the project (before clearing or grubbing) and maintained for the duration of the project. The Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 of the California Code of Regulations [CCR] Section 93105) contains specific requirements for the preparation of an ADMP. Conditions of the ADMP shall include the following:* • *Provisions of this ADMP shall apply throughout construction, operation,*	Northern Sierra Air Quality Management District (NSAQMD)	Prior to the initiation of any clearing, grading, or construction activities	

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		and reclamation activities, except as specified otherwise. • *All visible track-out material (from vehicles leaving the work site) must be removed from all public roads at least once per day using wet sweeping or a HEPA-filter-equipped vacuum device. Sweeping or vacuuming on public roads shall be conducted so as to avoid peak AM and PM traffic hours.* • *A gravel pad designed and maintained to effectively clean tires of exiting vehicles, or a wheel wash system, or a minimum of 50 feet of pavement must be placed between the construction area and any public road, and must be used by all exiting vehicles (including personal vehicles and delivery trucks) throughout the duration of the project.* • *All active storage piles shall be adequately wetted or covered with plastic to ensure that no visible dust crosses the property boundary. Potential dust emissions from disturbed surface areas and storage piles that will remain inactive for more than seven days shall be controlled to completely prevent visible dust from crossing the property boundary by at least one of*			

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		the following methods (pursuant to [e][4][C] of the ATCM): *a. Keeping the surface adequately wetted;* *b. Applying chemical dust suppressants or chemical stabilizers according to the manufacturer's recommendations and all applicable regulations;* *c. Covering with tarp(s) or vegetative cover;* *d. Installing wind barriers of 50 percent porosity around three sides of all storage piles; and/or* *e. Installing wind barriers across open areas and between the project sites and any adjacent occupied residential or business property.* • *The maximum vehicle speed on all unpaved parts of the project sites must be clearly posted and must not exceed 15 miles per hour.* • *All areas where vehicles drive on the site, at all times when the area is subjected to vehicle or equipment traffic, shall be watered every two hours or kept adequately wetted to prevent visible dust emissions from leaving the property boundary,*			

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		except where a gravel cover has been established that has a silt content of less than five percent and an asbestos content of less than 0.25 percent and is at least three inches thick. • *For all earthmoving activities, at least one of the following methods of dust control shall be implemented, pursuant to (e)(4)(E) of the ATCM:* *a. Pre-wetting the ground to the depth of anticipated cuts; and/or* *b. Suspending grading operations when visible dust emissions from any aspect of the grading (including tires, fans, and exhaust) cross the property line.* • *Trucks used for hauling material off site shall be maintained such that spillage cannot occur from holes or other openings.* • *All loads to be hauled off site shall be adequately wetted to prevent visible dust from escaping during transportation, pursuant to (e)(4)(F)2 of the ATCM, and shall either:*			

MITIGATION MONITORING AND REPORTING PROGRAM Idaho-Maryland Mine Project					
Impact Number	**Impact**	**Mitigation Measures**	**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
		a. be completely covered with tarps; or *b. have at least six inches of freeboard on the sides of the bed of the vehicle, with no excavated material extending above the edges of the vehicle bed at any point.* • *Upon completion of the project, disturbed surface areas shall be stabilized, pursuant to (e)(4)(G) of the ATCM, using one or more of the following methods:* *a. establishment of a vegetative cover;* *b. placement of at least three inches of material having an asbestos content of 0.25 percent asbestos or less as measured using an approved asbestos bulk test method; and/or* *c. paving.* • *The NSAQMD's Air Pollution Control Officer may require bulk sampling at any time. If bulk sampling is required, the sampling shall be performed in accordance with California Air Resources Board Test Method 435. Where Method 435 specifies*			

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Impact Number	**Impact**	**Mitigation Measures**		**Monitoring Agency**	**Implementation Schedule**	**Sign-off**
			"serpentine," this shall apply to gravel, decomposed ultramafic rock, and any other material as specified by the Air Pollution Control Officer. • *The NSAQMD's Air Pollution Control Officer may require air monitoring at any time, and may modify the ADMP on the basis of results of the monitoring. If required, provisions of air monitoring shall be determined in coordination with the NSAQMD.* • *Before site disturbance (e.g., clearing, grubbing, or grading) begins, the NSAQMD shall be informed by telephone at (530) 274-9360 of the exact day on which site disturbance will commence.*			
4.3-7	Generation of GHG emissions that may have a significant impact on the environment.	*4.3-7(a)*	***Construction GHG Emissions Reductions.*** *To reduce greenhouse gas (GHG) emissions generated during project construction from construction equipment, the following measures shall be incorporated into the project construction drawings:* *a) Properly tune and maintain all construction equipment in accordance with manufacturer's specifications;* *b) Where feasible, employ the use of electrical or alternative fueled (i.e., non-diesel) construction equipment, including forklifts,*	Nevada County Planning Department	Prior to the approval of construction drawings	

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		concrete/industrial saws, pumps, aerial lifts, air compressors, and other comparable equipment types to the extent commercially available; *c) To reduce the need for electric generators and other fuel-powered equipment, provide on-site electrical hookups for the use of hand tools such as saws, drills, and compressors used for building construction;* *d) Encourage and provide carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes;* *e) Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products utilized should be certified through a sustainable forestry program; and* *f) Minimize the amount of concrete for paved surfaces or utilize a low carbon concrete option.*			
		4.3-7(b) ***Carbon Offsets – Construction Emissions.*** *Rise Grass Valley Inc. (Rise) shall retire carbon offsets in a quantity sufficient to offset the project's construction greenhouse gas (GHG) emissions to below the 1,100*	Nevada County Planning Department	Prior to issuance of the first grading permit	

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		metric ton carbon dioxide equivalent (MT CO2e) per year construction threshold, consistent with the performance standards and requirements set forth below. Specifically, prior to Nevada County's (County) issuance of the project's first grading permit, Rise shall retire carbon offsets equaling 2,345 MT CO2e, which was calculated by subtracting 1,100 MT CO2e (threshold) from the construction emissions generated by the project. ***Carbon Offset Standards – Eligible Registries, Acceptable Protocols and Defined Terms:*** *"Carbon offset" shall mean an instrument, credit or other certification verifying the reduction of GHG emissions issued by the Climate Action Reserve, the American Carbon Registry, or Verra (previously, the Verified Carbon Standard). This shall include, but is not limited to, an instrument, credit or other certification issued by these registries for GHG reduction activities within the Nevada County region. The Project shall neither purchase offsets from the Clean Development Mechanism (CDM) registry nor purchase offsets generated under CDM protocols. Qualifying carbon offsets presented for compliance with this mitigation measure may be used provided that the evidence required by the "Reporting and Enforcement Standards" below is submitted to the County demonstrating that each*			

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		registry shall continue its existing practice of requiring the following for the development and approval of protocols or methodologies: *i) Adherence to established GHG accounting principles set forth in the International Organization for Standardization (ISO) 14064, Part 2 or the World Resources Institute/World Business Council for Sustainable Development (WRI/WBCSD) Greenhouse Gas Protocol for Project Accounting; and* *ii) Oversight of the implementation of protocols and methodologies that define the eligibility of carbon offset projects and set forth standards for the estimation, monitoring and verification of GHG reductions achieved from such projects. The protocols and methodologies shall:* *a. Be developed by the registries through a transparent public and expert stakeholder review process that affords an opportunity for comment and is informed by science;* *b. Incorporate standardized offset crediting parameters that define whether and how much emissions reduction credit a carbon offset project*			

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		should receive, having identified conservative project baselines and the length of the crediting period and considered potential leakage and quantification uncertainties; *c. Establish data collection and monitoring procedures, mechanisms to ensure permanency in reductions, and additionality and geographic boundary provisions; and,* *d. Adhere to the principles set forth in the program manuals of each of the aforementioned registries, as such manuals are updated from time to time.* *e. Be approved by the California Air Resources Board, and be compliant with 17 CCR § 95972 and AB 32 (the California Global Warming Solutions Act of 2006) to the extent applicable to voluntary offsets.* *Further, any carbon offset used to reduce the project's GHG emissions shall be a carbon offset that represents the past reduction or sequestration of one MT of*			

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		CO2e that is "not otherwise required" (CEQA Guidelines Section 15126.4[c][3]). Each carbon offset used to reduce GHG emissions shall achieve additional, real, permanent, quantifiable, verifiable, and enforceable reductions, which are defined for purposes of this mitigation measure as follows: *i) "Additional" means that the carbon offset is in addition to: (1) any greenhouse gas emission reduction otherwise required by law or regulation; (2) any other GHG emissions reduction that otherwise would occur; and (3) is consistent with Health and Safety Code Section 38562(d)(2);* *ii) "Real" means that the GHG reduction underlying the carbon offset results from a demonstrable action or set of actions, and is quantified under the protocol or methodology using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources and sinks within the boundary of the applicable carbon offset project, uncertainty, and the potential for activity shifting leakage and market-shifting leakage;* *iii) "Verifiable" means that the GHG reduction underlying the carbon*			

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		offset is well documented, transparent and set forth in a document prepared by an independent verification body that is accredited through the American National Standards Institute (ANSI); *iv) "Permanent" means that the GHG reduction underlying the carbon offset is not reversible; or, when GHG reduction may be reversible, that a mechanism is in place to replace any reversed GHG emission reduction;* *v) "Quantifiable" means the ability to accurately measure and calculate the GHG reduction relative to a project baseline in a reliable and replicable manner for all GHG emission sources and sinks included within the boundary of the carbon offset project, while accounting for uncertainty and leakage; and* *vi) "Enforceable" means that the implementation of the GHG reduction activity must represent the legally binding commitment of the offset project developer to undertake and carry it out.* *The protocols and methodologies of the Climate Action Reserve, the American Carbon Registry, and Verra establish and require carbon offset projects to comply with*			

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		standards designed to achieve additional, real, permanent, quantifiable, verifiable and enforceable reductions. Additionally, the "Reporting and Enforcement Standards" below ensure that the emissions reductions required by this mitigation measure are enforceable against Rise, as the County has authority to hold Rise accountable and to take appropriate corrective action if the County determines that any carbon offsets do not comply with the requirements set forth in this mitigation measure. *The above definitions are provided as criteria and performance standards associated with the use of carbon offsets. Such criteria and performance standards are intended only to further construe the standards under CEQA for mitigation related to GHG emissions (see, e.g., State CEQA Guidelines Section 15126.4(a), (c)), and are not intended to apply or incorporate the requirements of any other statutory or regulatory scheme not applicable to the project (e.g., the Cap-and-Trade Program).* *Additionally, the County shall require that all carbon offsets purchased by the Project applicant shall originate from inside the state of California.* ***Reporting and Enforcement Standards:*** *Prior to issuance of requested grading permits, Rise shall submit a report to the*			

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		County that identifies the quantity of emission reductions required by this mitigation measure, as well as the carbon offsets to be retired to achieve compliance with this measure. For purposes of demonstrating that each offset is additional, real, permanent, quantifiable, verifiable and enforceable, the report shall include: (i) the applicable protocol(s) and methodologies associated with the carbon offsets, (ii) the third-party verification report(s) and statement(s) affiliated with the carbon offset projects, (iii) the unique serial numbers assigned by the registry(ies) to the carbon offsets to be retired, which serves as evidence that the registry has determined the carbon offset project to have been implemented in accordance with the applicable protocol or methodology and ensures that the offsets cannot be further used in any manner, and information sufficient for the County to verify that the purchased offsets meet the requirements identified within this mitigation. *To ensure consistent and effective enforcement of this mitigation measure and to assist the County with its review of the report described above, an implementation process timeline and associated flow chart for the implementation and administration of this mitigation measure's requirements has*			

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		been prepared and is attached as Appendix F to the FEIR. *If the County determines that the project's carbon offsets do meet the requirements of this mitigation measure, the offsets can be used to reduce project GHG emissions and project permits shall be issued. If the County determines that the project's carbon offsets do not meet the requirements of this mitigation measure, the offsets cannot be used to reduce project GHG emissions and project permits shall not be issued. Additionally, the County may issue a notice of non-consistency and cease permitting activities in the event that the County determines the carbon offsets provided to reduce project GHG emissions are not compliant with the aforementioned standards. In the event of such an occurrence, project permitting activities shall not resume until Rise has demonstrated that the previously provided carbon offsets are compliant with the standards herein or have provided substitute carbon offsets achieving the standards of this mitigation measure in the quantity needed to achieve the required emission reduction. In the event that the project is out of compliance with this Mitigation Measure and fails to demonstrate compliance after receiving notice of said violation, the County shall have authority to impose administrative penalties, take legal action to force compliance, or to start*			

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		proceedings to suspend or revoke the Project's permits.			
4.4 Biological Resources					
4.4-1	Have a substantial adverse effect to special-status plant species either directly or through habitat modifications.	*Pine Hill Flannelbush* *4.4-1(a) i. Prior to issuance of grading permits for the Centennial Industrial Site, the project applicant shall obtain an Incidental Take Permit (ITP) from CDFW for Project-related impacts to the Pine Hill Flannelbush. During the consultation process with CDFW, the Centennial Pine Hill Flannelbush Habitat Management Plan (Matuzak 2021) (HMP) shall be revised if required by CDFW, and must be approved by CDFW prior to implementation. This HMP shall include habitat enhancement and conservation easement requirements. If the USFWS determines that the plants within the Study Area are the federally endangered Pine Hill flannelbush prior to project implementation, then a USFWS Biological Opinion must also be secured, and the USFWS would also need to approve the HMP prior to implementation. Note that the measures outlined below are minimum measures, and additional measures may be required by CDFW to be included in the HMP during consultation.* *Prior to issuance of grading permits for the Centennial Industrial Site, implement project-specific mitigation measures 1-3*	Nevada County Planning Department U.S. Fish and Wildlife Service (USFWS) California Department of Fish and Wildlife (CDFW)	Prior to the issuance of grading permits for the Centennial Industrial Site	

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		outlined below consistent with the County and CDFW approved HMP, as well as the Habitat Enhancement and Conservation Easement. Project-specific mitigation measures generally include protective measures for the Pine Hill flannelbush within the on-site avoidance area. For project actions that will directly impact the Pine Hill flannelbush, measure 4 (monitoring) shall occur on an ongoing basis, and measure 5 depends upon the results of monitoring, and thus, measures 4 and 5 are not required prior to issuance of grading permits). *1. Seed Collection;* *Collect seed for seedbanking and for future replacement and recovery efforts pursuant to the requirements of Section 6.2 of the HMP.* *2. Develop Transplantation Plan and Monitoring Plan;* *The Transplantation and Monitoring Plan shall be developed in consultation with USFWS and CDFW, and shall, at a minimum, address location(s) for dormant season relocation, site selection for transplanting, and metrics of successful establishment (i.e., Section 6 of the HMP).*			

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		3. Transplanting; *Transplant the individuals of Pine Hill flannelbush that fall within the disturbance footprint to another site with similar soil, hydrologic, vegetation type and aspect. The transplantation site(s) selected shall extend the known population spatially, in other words, planting beyond the known perimeters of the existing population is preferable, to maintain population coverage. Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.* *4. Transplant Monitoring; and* *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years. After monitoring identifies successful establishment and flowering for the second season for each of the transplants, transplanting will have been deemed successful.* *5. Alternative Measures to Transplantation and Seed Collection (if required pursuant to the criteria in the HMP)*			

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		If Steps 1-4 of the HMP are not successful in maintaining the Pine Hill flannelbush population numbers, then the following measures shall be taken: • *Individuals shall be grown from seed and transplanted out in a 100:1 ratio for those taken.* • *Transplants of individuals grown from seed shall be planted with similar soil, hydrologic, vegetation type and aspect.* • *Transplanting shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced.* • *Transplants shall be monitored every month for the first six months, then subsequently, every two months for the first two years.* ii. *<u>Habitat Enhancement:</u> Prior to issuance of grading permits, pursuant to the HMP, the applicant shall enhance Pine Hill flannelbush habitat outside the disturbance footprint, which could include removal of invasive plants and conducting a pilot study by collaborating with CAL FIRE or other research facility to conduct prescribed fire in areas to enhance natural germination and*			

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		recruitment, as Pine Hill flannelbush need fire for successful germination, and root sprouts. *iii. <u>Conservation Easement:</u> Prior to issuance of grading permits, the applicant shall record a Conservation Easement for the on-site Pine Hill flannelbush avoidance area, or use a similar land protection mechanism that runs with the land in perpetuity, to protect the Pine Hill flannelbush plants within the avoidance area. The management guidelines for the Conservation Easement or similar mechanism shall require that the habitat be managed for the Pine Hill flannelbush and its associated habitat. The applicant shall also record a Conservation Easement or use a similar land protection mechanism for any off-site areas not owned by the applicant where the transplants are to be located.* *Other Special-Status Plant Species* *4.4-1(b) Prior to issuance of grading permits for the Centennial Industrial Site and Brunswick Area (i.e., Brunswick Industrial Site and East Bennett Road ROW), focused plant surveys shall be performed according to CDFW and CNPS protocol (e.g., "Procotols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities", CDFW 2018), as generally described below. If*	Nevada County Planning Department	Prior to the issuance of grading permits for the Centennial Industrial Site and Brunswick Area (i.e., Brunswick Industrial Site and East Bennett Road ROW)	

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		special-status plant species (i.e., federal and/or state endangered, threatened, or proposed candidates for listing; CRPR Lists 1 or 2) are not found during appropriately timed focused surveys, then further mitigation is not necessary. The results of the surveys shall be submitted to the Nevada County Planning Department. *Prior to Improvement Plan approval for each phase of the project, focused surveys shall be performed by a qualified botanist during the appropriate early blooming period for those special-status plant species identified in the Biological Resources Assessments as potential occurring within the Centennial Industrial Site and/or Brunswick Area. Furthermore, should additional plants having the potential to occur within these areas be given special-status in the future, the qualified botanist shall also determine the presence/absence of such species. The survey(s) shall be conducted on-site as well as in any off-site improvement areas, as applicable for each phase, during the early identification periods (bloom periods) for all potentially occurring special-status plant species. If the special-status plant species are not found to be present during the focused survey(s), then no further action is required. The results of the focused surveys shall be submitted to the Nevada County Planning Department.*			

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		If any special-status plant species are found, and they are located in an area where impacts are proposed, then the special-status plants shall be completely avoided until a Habitat Management Plan (HMP) is developed and approved by the Nevada County Planning Department. If the plant is listed on the federal or state Endangered Species lists or is state listed as rare, then development of this plan shall be conducted in consultation with USFWS and/or CDFW, respectively, and a BO and/or an ITP shall be obtained prior to impacts. The HMP shall include the avoidance, minimization, and mitigation measures outlined below as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12. Note that transplantation and monitoring specifics are examples only, and final details will be developed based on the species to be impacted, if any. *At a minimum, the HMP shall include the following protective measures for special-status plant species with the potential to be impacted by the proposed disturbance:* • *a map of the location of special-status species that may be disturbed or need to be protected;* • *location of environmental protection fencing to be placed around the individual plants to be protected;*			

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		• *identification of the location of protected plants on design and construction drawings;* • *environmental awareness training for all personnel working on the project during initial site disturbance to discuss the location of the protected plants and the measures to be taken to avoid impacts to them; and* • *a qualified biologist shall be onsite during all vegetation and ground disturbing activities that are within the vicinity of special-status plants and weekly monitoring of the protective fencing along fencing along the buffer zone.* *Where individuals would be potentially affected directly by site disturbance and transplantation of individual plants is required to minimize and mitigate for impacts to such species, the following shall be integrated into the HMP:* • *remove bulbs of individual plants to be directly impacted during the dormant season;* • *relocate the bulbs to a site with similar soil, hydrologic, vegetation type and aspect as the portion of the project site where the plants are found; and*			

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		• *identify the location(s) for dormant season relocation and site selection for transplantation.* *The HMP would also include a requirement to meet the following criteria:* • *metrics of successful establishment, which would include a minimum of 80 percent survival of the transplants after two years of transplanting the species.* *If the 80 percent survival is not established after two years, transplants of individuals grown from seed shall be planted at a location with similar soil, hydrologic, vegetation type and aspect as the portion of the site where they are found. Transplantation shall occur in the season deemed to have the greatest potential for success, generally the fall, after rains have commenced. Transplants shall be monitored every month for the first six months, then every two months for a minimum of two years. After two summer seasons of monitoring identifies successful establishment of 50 percent of the initial transplants, transplant seedlings will be deemed successful.*			
4.4-2	Have a substantial adverse effect, either directly or through habitat modifications, on	*Foothill Yellow-Legged Frog* *4.4-2(a)* <u>*Pre-construction Survey and Avoidance and Minimization Measures.*</u> *A pre-construction survey shall be conducted by a qualified*	Nevada County Planning Department	No more than 14 days prior to disturbance within and directly	

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	any species identified as a candidate, sensitive, or special-status wildlife species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	*biologist following CDFW recommended Visual Encounter Survey (VES) methods no more than fourteen (14 days) prior to disturbance within and directly adjacent to (i.e., riparian zone) the South Fork Wolf Creek and Wolf Creek. If the pre-construction survey does not detect foothill yellow-legged frog, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.* *If this species is documented during pre-construction VES method surveys (egg masses, juveniles, or adults), disturbance to the stream and species shall be completely avoided given the species is listed as Threatened under CESA. If the species is documented during the pre-construction VES surveys, CDFW shall be contacted immediately. An Incidental Take Permit (ITP) may be required from CDFW as part of the development of conservation measures to ensure avoidance and minimization of potential impacts to any frogs identified within South Fork Wolf Creek and/or Wolf Creek. The ITP may allow a CDFW qualified wildlife biologist with a CDFW handling permit for the species to move individuals out of the disturbance areas to avoid impacting this species and/or other potential conservation measures to avoid and minimize impacts to the species.*	CDFW	adjacent to (i.e., riparian zone) the South Fork Wolf Creek and Wolf Creek	

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		Watercourse/Wetlands/Riparian Areas Management Plans. The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial Industrial Site and Brunswick Area, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of Best Management Practices (BMPs) during construction, and post construction erosion control.			
		Western Pond Turtle *4.4-2(b)* *Pre-construction Survey and Avoidance and Minimization Measures. A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites. The survey(s) shall include a search of these suitable habitat areas for western pond turtle nests and mature adults. If the pre-construction survey does not detect western pond turtle, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a western pond turtle is found, it should be*	Nevada County Planning Department	No more than seven (7) days prior to the proposed disturbance within 325 feet of perennial water sources at both the Centennial and Brunswick Industrial Sites	

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		allowed to move out of the way of the disturbance zone on its own or a qualified wildlife biologist with a CDFW handling permit for the species can move individuals out of the disturbance areas to avoid impacting this species. Work in the area shall cease and fencing or other protective measures shall be employed to excluded and prevent access to the area until the identified turtle has cleared the area. *If a nest is documented during pre-construction surveys, a non-disturbance buffer shall be established, as determined by a qualified biologist, based on the location of the nest until all eggs have hatched and the juveniles have dispersed out of the proposed impact area.* *Watercourse/Wetlands/Riparian Areas Management Plans. The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial Industrial Site and Brunswick Area, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during*			

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		construction, and post construction erosion control. *California Red-Legged Frog* *4.4-2(c)* *<u>Pre-construction Survey and Avoidance and Minimization Measures.</u> A qualified wildlife biologist approved by USFWS shall conduct preconstruction surveys within areas of suitable habitat on both the Centennial and Brunswick Industrial Sites in accordance with The Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog (USFWS Guidance, August 2005) to avoid disturbance and take of the species. This Guidance recommends a total of up to eight (8) surveys to determine the presence of CRLF at or near a project site. If the protocol surveys do not detect CRLF, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.* *If CRLF are identified during the pre-construction surveys, coordination and consultations with the USFWS shall be required through a FESA Section 7 or Section 10 process. As part of the consultation process, specific avoidance, minimization, and mitigation measures shall be required to be implemented, which could include, but may not be limited to the following: additional pre-construction*	Nevada County Planning Department	Prior to the initiation of construction activities within areas of suitable habitat on both the Centennial and Brunswick Industrial Sites	

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		surveys and daily monitoring to ensure that the proposed site disturbance will not disturb individual CRLF, environmental awareness training to contractors working within or adjacent to CRLF habitat, and exclusionary fencing installation between CRLF aquatic habitat and disturbance areas. *Additionally, a Habitat Management Plan (HMP) shall be required for any state or federally listed special-status wildlife species if documented within the Centennial or Brunswick Industrial Sites. The HMP would be developed for the special-status species as part of compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12 and it would include the avoidance, minimization, and mitigation measures outlined above and as part of any coordination or consultation with the USFWS compliance with the Nevada County Land Use and Development Code, Section L-II 4.3.12.* *<u>Watercourse/Wetlands/Riparian Areas Management Plans.</u> The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial and Brunswick Industrial Sites, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include,*			

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		but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control			
		California Black Rail *4.4-2(d)* *<u>Pre-construction Survey and Avoidance and Minimization Measures.</u> Pre-construction surveys for California black rail shall be conducted by a qualified biologist prior to the implementation of any ground disturbance within or directly adjacent to any perennial marsh and wet meadow habitat within the Centennial and Brunswick Industrial Sites. The pre-construction surveys for this species shall occur no more than fourteen (14) days prior to any such disturbance within or directly adjacent to the species habitat. The pre-construction surveys shall include conducting call back/response surveys. This species is most active between two hours before and three hours after sunrise; therefore, surveys shall start at sunrise and continue no later than 0930. If evening surveys are to be conducted, they shall be paired with a morning survey, and all sites shall have surveys conducted at both time periods. The preferred method for conducting surveys via the call-back/response protocol of Evens et al (1991). If the pre-construction survey does not detect evidence of California black rail, a*	Nevada County Planning Department CDFW	No more than 14 days prior to the implementation of any ground disturbance within or directly adjacent to any perennial marsh habitat within the Centennial and Brunswick Industrial Sites	

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		letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If a positive call back is identified during the surveys, then the species is assumed to be present and the area shall be avoided from disturbance in order to avoid impacts to individuals of the species, if feasible. *Given the species is a CESA listed species, coordination with CDFW shall occur if a positive response to the call-back/response surveys occurs and if any proposed disturbance may impact the species. Any area containing this species would likely need to be avoided in order to avoid impacts to and take of this species, if feasible, or additional mitigation measures would be required in coordination with CDFW to minimize and avoid impacts to such species. Additional avoidance measures could include, but may not be limited to the following: environmental awareness training, daily construction monitoring by a CDFW qualified biologist when disturbance related activities occur within or directly adjacent to the species habitat, and exclusionary fencing installation between the species habitat and the proposed disturbance areas. Areas where no positive response to the call-back/response surveys are assumed to not contain individuals of the species and therefore, disturbance in those*			

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		areas would have no impact on this species. *<u>Watercourse/Wetlands/Riparian Areas Management Plans.</u> The applicant shall implement the mitigation measures identified in the Aquatic Resources Management Plans for the Centennial and Brunswick Industrial Sites, pursuant to Mitigation Measure 4.4-3, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, mitigation for encroachment into non-disturbance buffers, restoration of impacted areas within stream zones, implementation of BMPs during construction, and post construction erosion control.* *Coast Horned Lizard* *4.4-2(e) <u>Pre-construction Survey and Avoidance and Minimization Measures.</u> A pre-construction survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance within the areas of the Centennial and Brunswick Industrial Sites that contain disturbed or developed surfaces and annual grassland vegetation community. If the pre-construction survey does not show evidence of coast horned lizard, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.*	Nevada County Planning Department	No more than seven days prior to disturbance within the areas of the Centennial and Brunswick Industrial Sites that contain disturbed or developed surfaces and annual grassland vegetation community	

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		If the species is documented during pre-construction survey(s), a qualified wildlife biologist (approved by CDFW) shall move individual coast horned lizards outside of the proposed disturbance area(s) in order to avoid an impact to this species. The qualified biologist shall have all required permits before commencing species specific surveys. Once the coast horned lizard(s) have been removed from the disturbance area(s) and out of harm's way, the proposed work would no longer pose a risk to individuals of the species.			
		Special-Status Bats *4.4-2(f)* *<u>Pre-construction Survey and Avoidance and Minimization Measures</u>. A pre-construction bat roosting survey shall be conducted by a qualified biologist no more than seven (7) days prior to disturbance of any structures or riparian and forested woodlands within the Centennial Industrial Site and Brunswick Area to identify the presence or absence of roosting bats. If the pre-construction survey does not show evidence of roosting bats, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required.* *If any Townsend's big-eared bats (or any other species of bat, including the hoary and pallid bat) are identified during roosting surveys, passive removal of the roosting*	Nevada County Planning Department	No more than seven days prior to disturbance of any structures or riparian and forested woodlands within the Centennial Industrial Site and Brunswick Area	

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		bats prior to disturbance to structures and riparian and forested woodlands shall be implemented to avoid impacts to this species. Passive removal includes allowing roosting bats to freely leave the roost site (riparian and forested woodlands and any structure). Once the roosting bats have been passively removed from the structure(s) and riparian and forested woodlands, the structure(s) would be closed off from recurring bat roosting within the structure(s) and the proposed work within the structure(s) would no longer pose a risk to individuals of the species. For riparian and forested woodlands containing bat roosts, the removal of trees associated with such woodlands would only occur once the bats leave the day roosts. Furthermore, if a maternal (breeding) roost is documented, no disturbance shall occur until a qualified bat biologist has determined the young bats are no longer roosting and the breeding roost has dispersed from the structure or riparian and forested woodlands they are found in.			
		Nesting Birds *4.4-2(g)* *Pre-construction Survey and Avoidance and Minimization Measures. Prior to initiation of ground-disturbing activities for any phase of project construction, if construction is expected to occur during the raptor nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation*	Nevada County Planning Department	Within seven days prior to commencement of ground-disturbing activities for any phase of project construction, if construction is expected to occur	

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		removal, including one daytime survey and one nighttime survey targeted at California spotted owl, consistent with the USFWS (1992) California spotted owl survey protocol. The pre-construction survey shall be conducted within 7 days prior to commencement of ground-disturbing activities. The survey shall be conducted within all areas of proposed disturbance and all accessible areas within 250 feet of proposed disturbance. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Nevada County Planning Department, and additional measures are not required. If construction does not commence within 7 days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required. Removal of any trees within the Brunswick Area would occur between September 1st and January 31st to ensure that no nesting birds, raptors, or owls would be impacted by the proposed IMM project. *If any active nests are located within the proposed disturbance area, including active nests within riparian habitat for the yellow-breasted chat, willow flycatcher, yellow warbler, and olive-sided flycatcher, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the*		during the raptor nesting season (February 1 to August 31)	

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		buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically 100 feet for migratory bird nests and 500 feet for raptor nests. If active nests are found within the disturbance footprint, a qualified biologist shall monitor nests weekly during construction to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical and/or the willow flycatcher, a State listed species, is documented nesting during the pre-construction surveys for nesting birds. Additionally, an ITP could be required by CDFW if complete avoidance of willow flycatcher is not feasible. If construction activities cause the nesting bird(s) to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer shall be increased, as determined by the qualified biologist, such that activities are far enough from the nest to stop the agitated behavior. The exclusionary buffer shall remain in place until the young have fledged or as otherwise determined by a qualified biologist.			
4.4-3	Have a substantial adverse effect on riparian habitat or other sensitive natural community, or State or	*4.4-3(a)* *Prior to initiation of ground-disturbing activities, the applicant shall provide a US Army Corps of Engineers (Corps) verification letter to the Nevada County Planning Department, indicating Corps'*	Nevada County Planning Department	Prior to initiation of ground-disturbing activities	

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	Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	*concurrence with the total acreage of jurisdictional waters that would be impacted within the Centennial Industrial Site and Brunswick Area as a result of the proposed project.* *4.4-3(b)* *The applicant shall implement the Watercourse/Wetlands/Riparian Areas Management Plans prepared for the Centennial Industrial Site and Brunswick Area, as approved in their final form by Nevada County. Specifically, the applicant shall implement the mitigation measures and conditions identified in the Management Plans, which include measures designed to protect aquatic resources and the biological resources they support. Such measures generally include, but are not limited to, the following and shall be implemented in accordance with their specified timing (e.g., either prior to, during, or after ground disturbance activities within non-disturbance buffers):* • ***Encroachment into the Non-Disturbance Buffers*** o *Limit construction to periods of extended dry weather and the dry summer season, if feasible;* o *Establishing the areas around active stream channels and wetlands as Environmentally*	Nevada County Planning Department	Prior to, during, and after ground disturbance activities within non-disturbance buffers	

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		Sensitive Area where those areas will not be impacted by construction or thereafter; o *No fill or dredge material will enter or be removed from any wetlands or streams except for those identified in Table 4.0 and Table 5.0 in the Management Plans during construction and thereafter;* o *Use appropriate machinery and equipment to limit disturbance within and directly adjacent to these areas;* o *Placement of soil erosion control devices (such as wattles, hay bales, etc.) between the protected aquatic resources (wetlands and streams) and the areas to be graded and disturbed to limit potential runoff and sedimentation into such protected resources;* o *Dewatering of any streams that will be required to occur as part of the proposed disturbance within the Brunswick Area must include a Water Diversion Plan and be approved by CDFW prior to the implementation of such dewatering activities; and*			

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		o *Implement Best Management Practices during and following construction.* • ***Restoration of Areas Adjacent to Impacted Streams*** <u>*Centennial Industrial Site*</u> o *Placement of rock and rip rap along the embankment of Wolf Creek should be avoided given the proposed Centennial Site Idaho-Maryland Mine Project will not encroach into Wolf Creek;* o *Some rock and rip rap can be placed at the top of the embankment of the ephemeral and intermittent streams within the Centennial Site Idaho-Maryland Mine Project, if needed, to protect the embankment(s) from erosion after construction is completed. This would potentially be implemented for ephemeral and intermittent streams that will not be completely filled or impacted and occur directly adjacent to the proposed fill of those streams; and* o *Plant willow cuttings from the adjacent willow trees and*			

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		other native shrubs and riparian trees along the embankments of streams not being impacted and filled as needed. A revegetation plan will be a requirement of the CDFW Streambed Alteration Agreement that will include impacts to the bed and bank, of any stream within the Centennial Site Idaho-Maryland Mine Project Area. Implementation of General and Project Specific Conditions will be required for all permits for the proposed project. *<u>Brunswick Area</u>* o *Placement of rock and rip rap along the embankment of the South Fork Wolf Creek should be minimized to reduce the footprint of such impacts to the perennial creek and its embankments;* o *Some of the rock and rip rap can be placed at the top of the embankment of the South Fork Wolf Creek to protect the embankment from further erosion during restoration of the riparian zone and*			

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		embankment on the southern side of the perennial stream. o *Plant willow cuttings from the adjacent willow trees and other native shrubs and riparian trees along the embankment and broadcast seed the embankment with local, native grass seed. A revegetation plan will be a requirement of the CDFW Streambed Alteration Agreement that will include impacts to the bed and bank, of any stream within the Brunswick Area. Implementation of General and Project Specific Conditions will be required for all permits for the proposed project.* • ***Implement BMPs During Construction*** o *Minimize the number and size of work areas for equipment and spoil storage sites in the vicinity of any streams and wetlands that will not be disturbed by project development. Place staging areas and other work areas outside of the 50-foot non-*			

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		disturbance buffers of ephemeral and intermittent aquatic resources and 100-foot non-disturbance buffers of perennial aquatic resources. o *The applicant shall exercise reasonable precaution to protect the aquatic resources within the Centennial Industrial Site and Brunswick Area, as well as the adjacent non-disturbance buffers of such aquatic resources, from pollution with fuels, oils, and other harmful materials. Construction byproducts and pollutants such as oil, cement, and wash water shall be prevented from discharging into or near these resources and shall be collected for removal off the site. All construction debris and associated materials and litter shall be removed from the work site immediately upon completion.* o *No equipment for vehicle maintenance or refueling shall occur within the 50-foot and 100-foot non-disturbance buffers. The contractor shall immediately contain and*			

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		clean up any petroleum or other chemical spills with absorbent materials such as sawdust or kitty litter. For other hazardous materials, follow the cleanup instruction on the label. • ***Implement Post Construction Erosion Control*** o *Exposed bare soil along the embankment of South Fork Wolf Creek, where the outfall and dissipation rip rap will occur, as well as the embankment of Wolf Creek and any exposed bare soil adjacent to the other mapped aquatic resources within the Centennial Industrial Site and Brunswick Area, including their 50-foot and 100-foot non-disturbance buffers, shall be protected against loss from erosion by the seeding of an erosion control mixture and restored with native grasses and mulching pursuant to Nevada County and regulatory agency guidelines. Non-native species that are known to invade wild lands, such as orchard grass, velvet*			

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		grass, rose clover, winter and spring vetch, and wild oats shall not be used as they displace native species.			
		4.4-3(c) To the extent feasible, as determined by the qualified biologist in coordination with the Corps, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Prior to initiation of ground-disturbing activities, a Section 404 permit for fill of any jurisdictional wetlands within the Centennial Industrial Site and Brunswick Area shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the Corps "no-net-loss" policy, be provided at a minimum 1:1 ratio and be based on the final impact acreages verified by the Corps. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines. Compensatory mitigation can include but is not limited to the following: onsite and/or offsite wetland creation and/or restoration, purchase or placement of conservation easements, payment of an in-lieu fee, and/or purchase of mitigation credits at an approved Corps wetland mitigation or conservation bank. *The applicant must also obtain a water quality certification from the RWQCB under*	Nevada County Planning Department U.S. Army Corps of Engineers (USACE) Central Valley Regional Water Quality Control Board (RWQCB)	Prior to initiation of ground-disturbing activities	

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		Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Nevada County Planning Department.			
		4.4-3(d) Prior to initiating of ground disturbing activities within the non-disturbance buffers for aquatic resources on the Centennial Industrial Site and Brunswick Area, the applicant shall apply for a Section 1600 Lake or Streambed Alteration Agreement from CDFW. Impacts to CDFW 1600 jurisdictional areas shall be outlined in the application and are expected to be in substantial conformance with the impacts to biological resources outlined in this EIR (see Tables 4.4-9 through 4.4-11). Impacts for each activity shall be broken down by temporary and permanent, and a description of the proposed mitigation for biological resource impacts shall be outlined per activity and then by temporary and permanent. Minimization and avoidance measures within jurisdictional areas shall be proposed as appropriate and may include: preconstruction species surveys and reporting, protective fencing around avoided biological resources, worker environmental awareness training, seeding disturbed areas immediately adjacent to riparian areas with native seed, and installation of project-specific storm water BMPs. Mitigation may include restoration or enhancement of	Nevada County Planning Department CDFW	Prior to initiation of ground disturbing activities within the non-disturbance buffers for aquatic resources on the Centennial Industrial Site and Brunswick Area	

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		jurisdictional resources on- or off-site, purchase of habitat credits from an agency-approved mitigation/conservation bank, off-site or on-site conservation easements, working with a local land trust to preserve aquatic or riparian areas, or any other method acceptable to CDFW. Mitigation shall be provided at a minimum 1:1 ratio. *A site revegetation plan would be required to be developed and approved by CDFW as part of a Streambed Alteration Agreement permit condition and native trees planned for removal with a diameter at breast height of 4 inches or greater would need to be mitigated for through planting of native riparian trees within adjacent stream zones not being impacted by the Idaho-Maryland Mine Project, with clear success criteria identified, monitoring and reporting required, and corrective actions to be taken if mitigation measures do not meet the proposed success criteria.* *Written verification of the Section 1600 Lake or Streambed Alteration Agreement shall be submitted to the Nevada County Planning Department.*			
4.4-6	Cumulative loss of habitat for special-status species.	*4.4-6* *Implement Mitigation Measures 4.4-1(a-b), 4.4-2 (a-g), and 4.4-3(a-d).*	See Mitigation Measures 4.4-1(a-b), 4.4-2 (a-g), and 4.4-3(a-d)	See Mitigation Measures 4.4-1(a-b), 4.4-2 (a-g), and 4.4-3(a-d)	

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4.5 Cultural and Tribal Cultural Resources					
4.5-1	Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines, Section 15064.5.	*4.5-1(a)* *Prior to issuance of building permits, the project applicant shall share the historical documentation of the Idaho-Maryland Mine Company in their possession with the public through one of the following libraries: the California State Library, the California Geology and Mining Library, or the Searls Library. The library shall consist of the following information:* • *Surface Maps (5 maps) – Approx. year at 1956, Showing topography, buildings, roads, exploration trenches and drill holes, underground workings at surface, and geology;* • *103 Level Maps (103 maps) – Approx. year 1942, Showing mine tunnels, raises and shafts, survey stations, geology, and drill holes;* • *Mine Geology Maps (61 maps) – Approx. year 1956, Showing geology on tunnels driven post WW2;* • *Mine Stoping Maps (219 Maps) – Approx. year 1956, Showing mine stoping;* • *Operation Reports 1919 to 1924 and 1926 to 1935, Providing monthly or annual reports on underground exploration and mine development;*	Nevada County Planning Department	Prior to issuance of building permits	

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		• *Monthly Development Reports – 1936 to 1956, Providing monthly reports on mine development;* • *Geological Summary Reports – 1936 to 1942, Providing monthly reports on underground exploration;* • *Underground Geology Photos – Collection of photos from 1940's of underground tunnels and geology; and* • *A digital mine model, including a 2D and 3D digitization of historic mine tunnels available in AutoCAD dwg and dxf formats.* *Proof of submittal to one of the above-listed libraries shall be provided to the Nevada County Planning Department.*			
		4.5-1(b) Following initial mine dewatering, and prior to commencement of underground mining, the project applicant shall retain a qualified historian meeting the Secretary of the Interior's standards, to perform a historical study of the underground mine workings in the areas deemed safe by a certified mining geologist. The historical study shall include but not be limited to an evaluation of the underground work environment, engineering, equipment, and practices, to the maximum extent feasible. The historical study shall be deposited at the same library selected in Mitigation Measure 4.5-1(a) and	Nevada County Planning Department	Following initial mine dewatering, and prior to commencement of underground mining	

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			submitted to the Nevada County Planning Department.			
4.5-2	Cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines, Section 15064.5.	*4.5-2*	*If cultural resources are discovered during construction or mining activities, pursuant to Nevada County LUDC Section L-II 4.3.6, all work shall cease within 200 feet of the find (based on the apparent distribution of cultural resources) and the County shall be immediately notified. Examples of cultural materials include midden soil, artifacts, chipped stone, exotic (non-native) rock, or unusual amounts of baked clay, shell, or bone.* *A qualified archeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall assess the significance of the find and make recommendations for further evaluation and treatment as necessary, to the satisfaction of the County. Further evaluation and treatment recommendations shall be consistent with CEQA Guidelines Section 15126.4(3) and may include processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, construction monitoring of further construction activities, and/or returning objects to a location within the project area where they will not be subject to future impacts.*	Nevada County Planning Department	If cultural resources are discovered during construction or mining activities	

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			Following a review of the find and consultation with appropriate experts, the authority to proceed may be accompanied by the addition of development requirements which provide for protection of the site and/or additional measures necessary to address the unique or sensitive nature of the site. The treatment recommendations made by the cultural resource specialist shall be documented in the project record. Any recommendations made by these experts that are not implemented, must be documented and explained in the project record. Work in the area(s) of the cultural resource discovery may only proceed after authorization is granted by the Nevada County Planning Department following coordination with cultural resources experts.			
4.5-3	Disturb any human remains, including those interred outside of dedicated cemeteries.	*4.5-3*	*Any person who, in the process of project activities, discovers any human remains within the project area, shall cease from all project activities within at least 200 feet of the discovery. In the event that human remains are encountered, the sheriff-coroner shall be notified immediately upon discovery. In the event that Native American human remains are encountered, the Native American Heritage Commission or the most likely descendants of the buried individual(s) who are qualified to represent Native American interests shall be contacted. Specific treatment of Native American human remains shall occur consistent with State law.*	Nevada County Planning Department Sheriff-Coroner Native American Heritage Commission (NAHC)	In the event that human remains are encountered in the process of project activities	

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4.5-4	Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe.	*4.5-4* *Implement Mitigation Measures 4.5-2 and 4.5-3.*	See Mitigation Measures 4.5-2 and 4.5-3	See Mitigation Measures 4.5-2 and 4.5-3	
4.6 Geology, Soils, and Mineral Resources					
4.6-1	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and landslides.	*4.6-1* *Prior to approval of Improvement Plans, the design recommendations from the Brunswick Industrial Site Geotechnical Report (November 18, 2019) shall be incorporated into the Plans to the satisfaction of the Nevada County Building Department. Recommendations regarding slope stability and seismic criteria are set forth in Sections 5.1 and 5.2 of the Geotechnical Report, including but not limited to:* • *Permanent cut slopes shall not be steeper than 2:1, horizontal to vertical (H:V).* • *Fill slopes greater than 30 feet in height shall be terraced with surface drains that restrict surface*	Nevada County Building Department	Prior to approval of Improvement Plans	

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		runoff from travelling more than 30 feet continuously down the fill slope face. The applicant shall retain NV5 to review fill slope configurations greater than approximately 10 feet in height, prior to fill placement. • *Fill shall be placed in horizontal lifts to the lines and grades shown on the grading plan. Slopes shall be constructed by overbuilding the slope face and then cutting it back to the design finished grade slope gradient. Fill shall not be constructed or extended horizontally by placing soil on an existing slope face and/or compacted by track walking.* • *Building footings shall be trenched into competent native soil, weathered rock or compacted fill, and reinforced with a minimum of two No. 4 rebar reinforcement, one near the top of the footing and one near the bottom.* • *Slab-on-grade floors shall be used and designed by a structural engineer with regard to the anticipated loading. Interior building concrete slab-on-grade floor shall meet minimum concrete slab thickness, steel reinforcement, rebar, and crushed rock or aggregate base layer*			

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			specifications in Section 5.2.3 of the Geotechnical Report. • *Rock anchors or doweling shall be used to provide lateral and uplift resistance where shallow, competent rock limits footing excavation. Rock anchors should only be installed in competent rock.*			
4.6-2	Result in substantial soil erosion or the loss of topsoil.	*4.6-2*	*Prior to approval of Improvement Plans, the Plans shall incorporate the Mitigation Measures and Best Management Practices (BMP) included in Section 5 of the Management Plans for Steep Slope and High Erosion Potential (Centennial Industrial Site and Brunswick Industrial Site, 2020), as approved in their final form by Nevada County. Mitigation Measures and BMPs set forth in the Management Plans include but are not limited to:* • *Incorporating the provisions of the Erosion and Sediment Control Plans (ECPs) (December 15, 2020) into the project design, including the "Notes" on the ECPs; including but not limited to the following:* o *The structural and hydraulic adequacy of all storm water containment or conveyance facilities shown on the ECPs shall be verified by a civil engineer, and he/she shall so*	Nevada County Planning Department	Prior to approval of Improvement Plans	

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		attest on the Plans, with proof provided to Nevada County prior to any project grading, clearing, or tree disturbance. o *Soil stockpiling shall have proper erosion control measures applied to control runoff and prevent erosion.* o *All areas where construction activities have been completed between April 15th and October 15th shall be planted no later than November 1st. Land disturbance areas completed at other times of the year shall be planted within 15 days. If re-vegetation is infeasible or cannot be expected to stabilize an erodible area with assurance during any part of the rainy season and the unstable area exceeds 2,500 square feet, additional erosion and sediment control measures or irrigation of planted slopes may be required, as determined appropriate, to prevent increased sediment discharge.* • *Obtaining coverage under the SWRQB NPDES Construction*			

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		General Permit (Order No. 2009-0009-DWQ), including: o *Submittal of a Notice of Intent (NOI) and payment of permit fee(s);* o *Preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for each Site;* • *Performing earthwork in accordance with the grading recommendations presented in the Centennial Industrial Site and Brunswick Industrial Site Geotechnical Engineering Reports (NV5);* • *Prohibiting disturbance of steep slopes (slopes of 30+ percent) beyond the area proposed to receive fill during that season (i.e., prior to the next anticipated storm event);* • *Monitoring of Mitigation Measures in accordance with the Construction General Permit monitoring requirements, as set forth in Section 5.3 of the Management Plans; and* • *Implementation of remedial measures in the event that water quality standards set forth in the*			

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		Construction General Permit are not being met.			
4.6-3	Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, or be located on expansive soil, as defined in Table 18-1B of the UBC.	*4.6-3(a)* *The Improvement Plan submittals shall include final geotechnical engineering reports produced by a California Registered Civil Engineer or Geotechnical Engineer. The Improvement Plans shall include the recommendations of the Geotechnical Engineering Reports, including but not limited to the following:* • *Grading* • *Import Fill* • *Existing Fill* • *Cut Slope Grading* • *Engineered Fill Placement* • *Fill Slope Grading* *In accordance with the recommendations from the Geotechnical Engineering Reports (Geotechnical Engineering Report, Idaho-Maryland Mine Project – Brunswick Industrial Site. November 18, 2019; and Geotechnical Engineering Report, Idaho-Maryland Mine Project – Centennial Industrial Site. December 20, 2019), grading plan review and construction monitoring shall occur, as follows:* • *Prior to construction, a licensed geotechnical engineer shall be retained at the applicant's expense to review the final grading plans to*	Nevada County Planning Department	Prior to approval of Improvement Plans, and not less than once per quarter.	

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		confirm whether the recommendations from the Geotechnical Engineering Reports have been adequately incorporated in the plans, and to provide additional and/or modified recommendations, if necessary; and • *The applicant shall retain a licensed geotechnical engineer to perform construction quality assurance (CQA) monitoring during all earthwork grading performed by the contractor to determine whether the recommendations of the Geotechnical Engineering Reports have been implemented, and if necessary, provide additional and/or modified recommendations.* *A CQA report demonstrating successful compliance with Geotechnical Engineering Report recommendations in all on-site earthwork shall be submitted to Nevada County periodically, but not less than once per quarter.*			
		4.6-3(b) In conjunction with submittal of Improvement Plans for the Brunswick Industrial Site, the applicant shall submit a grading plan, cross sections, and a slope stability analysis of proposed cut slopes for the new service shaft collar and the clay-lined pond dam	Nevada County Building Department	In conjunction with submittal of Improvement Plans for the Brunswick Industrial Site	

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		repair work, for review and approval of the Nevada County Building Department. The submittal shall be prepared and stamped by a licensed geotechnical engineer. The grading plan and cross sections shall depict typical temporary cut slope gradients, excavation depths, maximum water surface elevation, and earthwork volume estimates, and any additional geotechnical engineering methods, such as shoring, to mitigate potential slope instability.			
		4.6-3(c) In conjunction with submittal of Improvements Plans for the Centennial and Brunswick Industrial Sites, the applicant shall submit a physical closure evaluation of the following near-surface mine features to the Nevada County Building Department: • *East Eureka Shaft (shall be closed prior to initial mine dewatering)* • *East Eureka Drain (shall be closed prior to initial mine dewatering)* • *Idaho Drain Tunnel (shall be closed prior to initial mine dewatering)* • *Idaho Pump Shaft (shall be closed prior to initial mine dewatering)* • *Idaho Shaft (shall be closed prior to initial mine dewatering)* • *South Idaho Shaft (shall be closed prior to placement of engineered fill at the Centennial Industrial Site)*	Nevada County Building Department	In conjunction with submittal of Improvement Plans for the Centennial and Brunswick Industrial Sites	

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		The evaluation shall be stamped by a licensed geotechnical engineer and identify methods of physical closure, based on overexcavation of surface soil in the areas of these features to determine where competent, native soil/rock is located and to identify the trend of any subsurface mining-related structures. Closure methods could include but not be limited to the use of a cast-in-place concrete cap or plug supported by temporary false work and covered to the ground surface with engineered fill. The closure design shall include drainage piping for those near surface features that currently discharge groundwater, and closure shall occur prior to initial mine dewatering or, for the South Idaho Shaft, prior to the placement of engineered fill at the Centennial Industrial Site.			
4.6-4	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	*4.6-4* *In conjunction with submittal of Improvement Plans, the project applicant shall submit a complete sewage disposal design report accounting for all sewage waste water disposal per project buildout, for review and approval of the Nevada County Environmental Health Department. Unless otherwise determined in the sewage disposal design report, the Improvement Plans shall comply with the recommendations set forth in the septic system evaluation prepared for the Brunswick Industrial Site by Navo & Sons, Inc., including the following:*	Nevada County Environmental Health Department	In conjunction with submittal of Improvement Plans	

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		• *Leach lines shall be installed 36 inches wide by 24 inches deep, with 12 inches of drain rock and 7-foot separation on center per line, installed level on contour.* • *The leach shall be pressure dosed leach lines consisting of a minimum of four zones. The rotation of zones would allow the zones to rest in between doses and prevent over saturation of any one zone. In addition, if one zone has a problem, that zone could be isolated and repaired while other zones are working. This would result in little to no downtime and greatly reduce the possibility of sewage spills (surfacing).* • *Duplex (two) pumps shall be used in the pump tank to ensure that if one pump fails, a backup exists. The pumps would alternate to the extent of their life, unless one fails.* • *Due to the distance and elevation between the proposed shower and laundry area to the leach field, the pump line would be running through a low area upgradient from potentially sensitive areas. The pump line shall be sleeved in this low area to avoid potential issues related to sensitive areas if the line were to rupture.*			

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		• *During installation, existing trees shall be maintained in place to the extent feasible to avoid the creation of large holes in the leach area, help stabilize soil, and help absorb leaching effluent.* • *The following setbacks shall be maintained:* o *10 feet from developed property lines;* o *50 feet from undeveloped property lines;* o *50 feet from seasonal drainages;* o *25 feet from center line of swales; and* o *100 feet from any perennial streams or domestic wells.* • *The pressure dose septic system shall be maintained annually for the life of the system.* • *The septic system shall be installed by a licensed contractor (A, C-34, or C-42) familiar with installation of the proposed system.* • *A permit to install the septic system shall be obtained from the NCEHD.* • *The pump screen shall be removed and rinsed annually.*			

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		• *The pump, pump float, alarm float, and alarm shall be checked for proper operation annually.* • *The primary and 100 percent repair area shall be protected from vehicular traffic, structures, or any other activity that may cause alterations such as grading, cuts/fills, etc.* • *All drainage shall be diverted away from the septic tank, pump tank, and leach field. Irrigation in the area of the leach trenches shall be kept to a minimum to avoid saturation of the soil. Drip irrigation should be used.* • *Water conservation is recommended to maximize the life expectancy of the absorption trenches.* • *Any leaks shall be fixed immediately to avoid unnecessary saturation of the leach trenches.*			
4.7 Hazards and Hazardous Materials					
4.7-1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	*4.7-1(a)* *The mine operator shall comply with all applicable federal and state regulations governing the transport, underground storage and use of explosives, including MSHA (CFR Title 30, Part 57), OSHA (CFR Title 29, Part 1910 and 1926), and CCR (Title 8, Part 5251ff. and 5291).*	Nevada County Environmental Health Department	During the transport, underground storage, and use of explosives	

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		4.7-1(b)	*The mine operator shall prepare a Risk Assessment when the underground mine is accessible after initial dewatering and before storage of explosives underground, specifying the location of each magazine and its maximum storage capacity. The Risk Assessment shall be performed by a qualified professional (e.g., licensed engineer) in accordance with the Methods and Algorithms Used for Quantitative Risk Analysis of the Institute of Markers of Explosives and submitted to MSHA for their review. The Risk Assessment shall demonstrate protection of the public from hazards of explosives storage and be provided to the Nevada County Planning Department before underground storage of explosives.*	Nevada County Planning Department	After initial dewatering and before storage of explosives underground	
		4.7-1(c)	*The mine operator shall ensure, through the enforcement of contractual obligations, that all contractors or suppliers transport explosives in a manner consistent with all applicable regulations and guidelines. Proof of the agreement between the operator and contractor or supplier transporting explosives shall be provided to the Nevada County Planning Department before transporting explosives to the site.*	Nevada County Planning Department	Prior to transporting explosives to the site	
		4.7-1(d)	*Prior to the transport, storage, or use of hazardous materials or explosives at the site, the mine operator shall prepare a Hazardous Materials Business Plan*	Nevada County Planning Department	Prior to the transport, storage, or use of hazardous materials or	

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			(HMBP). The County shall review and approve the HMBP prior to the use or storage of hazardous materials or explosives on-site.	Nevada County Environmental Health Department	explosives at the site	
4.7-2	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment or be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	*4.7-2(a)*	*If disturbance of the mine waste beneath the southeastern paved area within the Brunswick Industrial Site is proposed as part of the project, the site-specific arsenic concentration data resulting from the Phase I/II ESA prepared by NV5 for the proposed project shall be furnished to the project contractor(s) so the contractor(s) can comply with applicable health and safety requirements accordingly. The project contractor(s) shall retain a Certified Industrial Hygienist to develop specific handling procedures for the mine waste, including dust mitigation. Mine waste shall not be removed from the site without regulatory approval by the RWQCB or DTSC. Verification of proper handling and disposal of the mine waste shall be provided to the Nevada County Planning Department.*	Nevada County Planning Department Central Valley RWQCB Department of Toxic Substances Control (DTSC)	If disturbance of the mine waste beneath the southeastern paved area within the Brunswick Industrial Site is proposed as part of the project	
		4.7-2(b)	*If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site improvements, work shall stop in the area of potential contamination, and the type and extent of contamination shall be identified by a Registered Environmental Assessor (REA)*	Nevada County Planning Department	If unidentified or suspected contaminated soil or groundwater is encountered during site improvements	

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		or qualified professional. The REA or qualified professional shall prepare a report that includes, but is not limited to, activities performed for the assessment, summary of anticipated contaminants and contaminant concentrations, relevant Environmental Screening Levels for identified contaminants, whether the contaminants exceed Environmental Screening Levels, thus warranting remediation, and recommendations for appropriate handling and disposal. Site improvement activities shall not recommence within the contaminated areas until any necessary remediation identified in the report is complete. The report and verification of proper remediation and disposal shall be submitted to the Nevada County Planning Department for review and approval.			
		4.7-2(c) Prior to commencement of any construction activities, the project applicant shall determine the location of all existing wells on the site. Prior to any ground disturbance activities within 50 feet of an identified well on the project site, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from the NCEHD for any wells that will no longer be used, and properly abandon the on-site wells, pursuant to Department of Water Resources Bulletin 74-81 (Water Well Standards, Part III), for review and approval by the NCEHD.	Nevada County Environmental Health Department	Prior to commencement of any construction activities	
4.8 Hydrology and Water Quality					

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4.8-1	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	*4.8-1(a)*	*The applicant shall submit a Notice of Intent (NOI) to the Central Valley Regional Water Quality Control Board (RWQCB) for coverage under the Limited Threat Discharge permit (General Order R5-2022-0006; NPDES No. CAG995002), at least six months prior to construction of the water treatment system; and the Notice of Applicability (NOA) shall be received before initial mine dewatering can begin and provided to Nevada County Planning Department. The NOI shall include evaluation of potential constituents of concern, including ammonia, arsenic, hexavalent chromium, iron, manganese, pH, total suspended solids, TDS, and cis-1,2-DCE, and demonstrate that water treatment plant (WTP) design shall successfully treat mine water to meet the water quality standards and treatment goals identified in the Limited Threat Discharge Order. Upon construction of the WTP, sampling shall be provided to the RWQCB demonstrating that the treated water meets the water quality standards and treatment goals specified in the Order. Ongoing monitoring of treated water shall occur at a location specified by the State prior to the point of discharge at South Fork Wolf Creek. The owner shall be required to submit quarterly monitoring reports to the State Regional Water Quality Control Board, demonstrating compliance with the maximum daily effluent limitations specified in Section V of the NPDES permit.*	Nevada County Planning Department Central Valley RWQCB	At least six months prior to construction of the water treatment system	

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		The applicant shall submit to the County a copy of the NOI and evidence of the applicant's receipt of the NOA specified above prior to initial mine dewatering. The applicant shall submit copies of sampling and monitoring reports to the County at the time such reports are submitted to the RWQCB. *The applicant shall also submit a Report of Waste Discharge (RoWD) and obtain Waste Discharge Requirements (WDRs) for use of the surface impoundment (i.e., Brunswick clay-lined pond) in the mine water treatment process. At a minimum, the liner of the clay-lined surface impoundment shall be upgraded to include a synthetic liner meeting the specifications in Title 27, Section 22490(f), of the California Code of Regulations. Prior to initial mine dewatering, the applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs, as well as evidence of the completion of modifications to the clay-lined pond in compliance with the requirements.*			
		4.8-1(b) *Prior to commencement of construction activities, the applicant shall submit a Notice of Intent (NOI) to the Central Valley RWQCB for coverage under the Construction General Permit applicable for any site on which construction is to occur and prepare a Construction Stormwater Pollution*	Nevada County Planning Department Central Valley RWQCB	Prior to commencement of construction activities	

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		Prevention Plan (C-SWPPP). The applicant shall submit a copy of the NOI and C-SWPPP to the to the Nevada County Planning Department prior to the initiation of construction activities at a given site. C-SWPPP(s) shall be maintained and all BMPs and reporting requirements complied with until such time as terminated as a result of the completion of construction and permanent site stabilization or until an Industrial SWPPP becomes applicable to the site pursuant to Mitigation Measure 4.8-1(c).			
		4.8-1(c) *Prior to commencement of operations at the Brunswick Industrial Site, the applicant shall submit a Notice of Intent (NOI) to the Central Valley RWQCB for coverage under the Industrial General Permit for the Brunswick Industrial Site and prepare an Industrial Stormwater Pollution Prevention Plan (I-SWPPP). The applicant shall submit a copy of the NOI and I-SWPPP to the to the Nevada County Planning Department prior to termination of the C-SWPPP.*	Nevada County Planning Department Central Valley RWQCB	Prior to commencement of operations at the Brunswick Industrial Site	
		4.8-1(d) *Prior to placement of CPB in the mine, the applicant shall conduct strength, rheological, and geochemical testing using the final CPB formulation in order to confirm that no constituents (e.g., pH values or chromium) release above water quality standards from the final selected CPB formulation, as a result of the binder composition or the*	Nevada County Planning Department Central Valley RWQCB	Prior to placement of CPB in the mine	

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		interaction between the binder and the tailings material. The applicant shall submit a RoWD to the Central Valley RWQCB for the use of CPB at least six months prior to the proposed initial use of CPB. The WDR permit shall be received by the applicant prior to initiating any mine backfilling using CPB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the use of CPB.			
		4.8-1(e) The applicant shall submit a RoWD and obtain WDRs from the Central Valley RWQCB for construction of the engineered fill areas. The WDR permit shall be received by the applicant prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites. Proof of coverage shall be provided to the Nevada County Public Works Department. As part of this process, the RWQCB will determine the appropriate mining waste classification for the proposed engineered fill, and will consider the following factors: (1) whether the waste contains hazardous constituents only at low concentrations; (2) whether the waste has no or low acid generating potential; and (3) whether, because of its intrinsic properties, the waste is readily containable by less stringent measures. The engineered fill areas shall be constructed in accordance with the Title 27 specifications, pursuant to the mining waste	Nevada County Planning Department Nevada County Public Works Department Central Valley RWQCB	Prior to initiating any engineered fill placement activities at the Centennial or Brunswick Industrial Sites	

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		classification determined by the RWQCB. The applicant shall submit to the Nevada County Planning Department a copy of the RoWD and evidence of the applicant's receipt of WDRs prior to the placement of fill or fill site preparation disturbance at the Brunswick Industrial Site and Centennial Industrial Site. The RoWD must also include a report on the physical and chemical characteristics of the waste, in compliance with Water Code section 13260(k), that could affect its potential to cause pollution or contamination as well as a report that evaluates the potential of the discharge of mining waste to produce, over the long term, acid mine drainage, the discharge or leaching of heavy metals, or the release of other hazardous substances. The WDR's will require continuous and routine characterization and classification (Cal Code regs Title 27 section 22480(b)) of the mining waste to evaluate any possible changes in the geological or geochemical nature of the waste. The applicant will prepare and implement a Waste Characterization Plan (Characterization Plan) which will be incorporated into the approved WDR. The purpose of the Characterization Plan is to continually evaluate the different forms of mining wastes and to appropriately classify these wastes as Group A, Group B, or Group C based on an assessment of the potential risk of water quality degradation posed by each waste. Through the WDR these wastes			

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			will be required to be managed, treated, stored, or disposed of in a manner that is protective of water quality. The applicant shall not sell or utilize waste rock and tailings from the Project for construction aggregate or fill purposes offsite (i.e. sites other than the applicants Brunswick and Centennial sites) unless such material has been tested and confirmed to qualify as Group C mining waste under California Code of Regulations Section 22480 and the approved WDR. The specific methods, volumes and frequency of characterization will be established in the approved WDR.			
4.8-2	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	*4.8-2(a)*	*The project applicant shall implement the Groundwater Monitoring Plan (GMP) prepared by Itasca Denver, Inc. (February 2021), as approved by the County. Implementation of the GMP shall be initiated prior to the dewatering of the mine and on an ongoing basis. Pursuant to the GMP, a network of monitoring wells shall be installed to the satisfaction of the Nevada County Environmental Health Department. Prior to construction of any monitoring wells within the County or City right-of-way, the applicant shall obtain an encroachment permit from the Public Works Department of the respective agency. Groundwater-level and groundwater quality information shall be obtained from the project groundwater monitoring wells and collected on a quarterly basis, and submitted in report form to the Nevada County Environmental Health*	Nevada County Environmental Health Department Nevada County Public Works Department	Prior to the dewatering of the mine and on an ongoing basis	

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		Department, and used to generate the following information: *1) Water-level and groundwater quality monitoring data for a minimum of 12 months before commencement of dewatering of the mine.* *2) Water-level hydrographs for each well showing the water-level variations over the monitoring period and a comprehensive well hydrograph showing long-term water levels for each well over the entire monitoring period.* *3) Potentiometric-surface contour maps showing the groundwater elevations across the site. These may be produced for a subset of the shallow wells and a second subset for the deeper wells if it is judged that the shallow and deep well systems are in separate water-bearing zones. Alternatively, a combined potentiometric map that includes both shallow and deep well pairs may be constructed if it is judged that the shallow and deep wells are installed within the same water-bearing zone.* *4) A projected water-level impact assessment for individual domestic wells shall be performed once dewatering of the underground mine workings commences, based*			

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		on responses of the measured groundwater levels of the project monitoring wells. The projected groundwater drawdown shall be estimated for each domestic well in the project area. This impact assessment shall be performed by tabulating the variation of the measured water levels from the project monitoring wells over the monitoring period and during the dewatering of the underground mine workings and mining operations. For each domestic well, a projected and seasonally averaged water level shall be estimated based on the domestic well location and the background potentiometric conditions, which will serve as a baseline groundwater level and shall be developed prior to the initiation of dewatering of the underground mine workings.			
		4.8-2(b) If, based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s) (i.e., a 10 percent or greater reduction of the water column of any well), pursuant to Nevada County General Plan Policy 17.12, the project applicant shall be responsible for providing a comparable supply of water to such homes or businesses whose wells are	Nevada County Environmental Health Department	If, based on the GMP, it is determined that mining operations are resulting in a significant impact to any well(s)	

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		significantly impacted, and if necessary, providing an immediate water supply until the source of the problem is determined and rectified. The comparable supply of water shall be provided to the satisfaction of the Nevada County Environmental Health Department. Such action could include extension of NID potable water or deepening of domestic water wells, in all cases paid for by the project applicant.			
		4.8-2(c) Prior to commencement of initial mine dewatering, the project applicant shall implement the Well Mitigation Plan (February 2, 2021, Rise Grass Valley, Inc.) by connecting 30 properties in the East Bennett area to the NID potable water system (see Figure 1 and Table 1 of the Well Mitigation Plan for specific property locations). The project applicant shall be responsible for fully funding the following for each property connection: *1) Engineering and Permitting to NID and County standards.* *2) Construction of main water piping, interconnecting the existing NID pipelines at E. Bennet Road and Whispering Pines Lane in accordance with NID standards and NID approved engineering design.* *3) Construction of service lateral piping in accordance with NID*	Nevada County Environmental Health Department	Prior to commencement of initial mine dewatering	

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		standards and NID approved engineering design. *4) Installation of water meters at property line in accordance with NID standards and NID approved engineering design.* *5) Connection of water meters to house (If requested and authorized by property owner)* *6) Closure of domestic water wells (If requested and authorized by property owner)* *7) NID installation and capacity charges for a 5/8-inch meter connection.* *8) Reimbursement for water charges, for monthly fixed service charges and use of up to 400 gallons per day, will continue until the sooner of the following occurs: 1) The property is sold by the owner after the NID connection is accomplished and paid for by Rise. 2) The property is annexed into the City of Grass Valley.* *9) Of the 30 properties, it is anticipated that only APN 009-600-012 is not eligible for water cost reimbursement as it is currently vacant. Existing NID customers will not be eligible for reimbursement of NID water charges and will be confirmed through consultation with NID during the design*			

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		process. *10) All easements necessary for construction and ongoing maintenance of the new pipeline shall be acquired by the applicant and conveyed to NID prior to acceptance of the new potable line.* *Proof of satisfaction of this measure shall be provided to Nevada County Environmental Health Department for each property identified in the Well Mitigation Plan.*			
4.8-3	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) Result in substantial erosion or siltation on- or off-site? ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	*4.8-3* *As part of the Improvement Plan submittal process, the applicant shall submit a Final Drainage Report to the Nevada County Planning and Public Works Departments for review and approval. The Final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity. The report shall address the Centennial and Brunswick Industrial Sites, be prepared by a Registered Civil Engineer, and shall, at a minimum, include: narrative describing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements to accommodate flows from this project, including treated mine water discharge and stormwater runoff. The Final Drainage Report shall demonstrate that the on-site storm drain systems are sized such*	Nevada County Planning Department Nevada County Public Works Department	Prior to approval of Improvement Plans	

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	iii) Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? iv) Impede or redirect flood flows?	*that site runoff (in addition to treated mine discharge for the Brunswick Industrial Site) under the post-development condition will not exceed pre-development levels in the downstream channel(s) during the design storm events.*			
4.8-5	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	*4.8-5* *The applicant shall implement the Floodplain Management Plan prepared for the Centennial Industrial Site, as approved in its final form by Nevada County. Specifically, the applicant shall implement the mitigation measures and conditions identified in the Floodplain Management Plan, which include measures designed to mitigate the impact of development on the floodplain. Such measures generally include, but are not limited to, the following and shall be implemented in accordance with their specified timing (e.g., either prior to, during, or after ground disturbance activities within the 100-foot floodplain buffer):* • *Grading and land disturbance within the limits of the SFHA (100-year floodplain) of Wolf Creek shall be avoided.*	Nevada County Planning Department	Prior to, during, and after ground disturbance activities within the 100-foot floodplain buffer	

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		• *Prior to commencing construction, the 100-year floodplain boundary shall be delineated by appropriate means on the Centennial Industrial Site to ensure that construction activities remain outside the 100-year floodplain.* • *As early as practicable once the engineered fill development has begun, the detention basin proposed in the Preliminary Drainage Analysis & Detention Study by Nevada City Engineering, Inc. shall be installed and made operational. During the grading operation, erosion control measures should be maintained in place on the fill pad to avoid silt and runoff from the pad proceeding down the fill slope towards Wolf Creek, and to direct all runoff to the detention basin which is to be constructed at the northwest corner of the fill area. During this time all potential runoff from the engineered fill pad area shall concurrently be directed to this basin for both its detention and de-siltation benefits.* • *No significant increase in impermeable surfaces shall occur within 100 feet of the 100-year floodplain. The only added impervious surface shall be*			

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		approximately 520 lineal feet of concrete V-ditch at the toe of the engineered fill slope. This will have no measurable impact on drainage runoff or flooding. • *Areas within 100 feet of the 100-year floodplain, which are disturbed due to construction activity, shall be regraded to a smooth, natural contour resembling their pre-development configuration, with the exception of approximately 0.55-acre of engineered fill located on the northeast corner of the proposed Centennial Industrial Site. Grading shall be done in such a manner as to smoothly convey flows through the property without accelerating their transit to downstream areas. All disturbed areas shall be subject to erosion control measures and protection during and after the engineered fill placement operation in order to stabilize any disturbed soil, thus eliminating the likelihood of increased erosion exiting the site toward downstream properties.* • *Temporary disturbance of vegetation within 100 feet of the 100-year floodplain due to construction shall be remediated by appropriate replacement plantings as recommended by the*			

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			project biologist and as pursuant to the project Reclamation Plan.			
4.10 Noise and Vibration						
4.10-1	Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to initial construction activities.	*4.10-1*	*The following noise reduction measures shall be implemented during construction of the potable water line along East Bennett Road and shall be included on Improvement Plans for installation of the potable water line to the satisfaction of the Nevada County Planning Department.* • *Provide advanced notification of pipeline construction dates and durations to each of the residences located along the construction corridor.* • *Ensure that all equipment utilizing internal combustion engines are fitted with working mufflers in good repair.* • *Utilize the quietest equipment capable of performing the required construction.* • *Locate construction staging areas as far as feasibly possible from existing residences.* • *If portable generators or air compressors are to be used, locate that equipment as far as feasibly possible from existing residences and, if possible, shield them from view of those residences using intervening topography or vehicles.*	Nevada County Planning Department	Noted on Improvement Plans, and during construction of the potable water line along East Bennett Road	

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		• *All mobile equipment shall be fitted with broad-band "growler" type back-up warning devices rather than the conventional "beeper" devices.*			
4.10-2	Generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, due to fill placement, compaction, off-site traffic, and related activities.	*4.10-2* *Haul truck operators shall be required to operate their trucks in such a manner so as to not require the use of jake brakes along the project haul routes. The project applicant shall post signage at the exits of both the Centennial Industrial Site and Brunswick Industrial Site informing drivers that the use of jake brakes is not permitted. Additionally, drivers directly employed by the project applicant, as well as any contract drivers, shall be required to abstain from use of jake brakes as a company policy. Proof of sign postage (e.g., photographic documentation) and a copy of the company policy language shall be provided to the Nevada County Planning Department prior to commencement of hauling. In the event that jake brake usage associated with project-related heavy truck traffic is observed, the project applicant shall implement additional measures to educate drivers regarding the safe operation of their vehicles without the use of jake brakes or take disciplinary action, if required, to the satisfaction of the Nevada County Planning Department. In addition, haul trucks shall be fitted with broad-band "growler" type back-up warning devices rather than the conventional "beeper" devices.*	Nevada County Planning Department	Prior to commencement of hauling	

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4.10-3	Generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	*4.10-3* *The following conditions shall be met, subject to review and approval by the Nevada County Planning Department:* *1. All on-site mobile equipment shall be fitted with broad-band "growler" type back-up warning devices rather than the conventional "beeper" devices.* *2. A comprehensive noise monitoring program shall be conducted of each facet of the operation to both verify the modelling assumptions of the project noise analysis (Bollard Acoustical Consultants, Inc. Noise and Vibration Analysis, Idaho Maryland Mine, Nevada County, California BAC Job #2018-203. March 8, 2021) and to ensure that compliance with the applicable Nevada County noise standards is being achieved at nearby sensitive receptors. The noise monitoring program shall evaluate noise levels at a minimum of five Receptor locations surrounding the Brunswick Industrial Site. The noise monitoring system shall consist of the installation of permanent noise monitors at three to five locations on the Brunswick Industrial Site, and one site at the Centennial Industrial Site, to be determined by a third-party noise*	Nevada County Planning Department	Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site	

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		consultant under contract with the County, in coordination with the applicant. The permanent monitors shall be provided with a continual power source, and shall include internet connectivity technology, to enable electronic retrieval of noise monitoring data at any time by the County's third-party noise consultant. *a. Within 30 days of installation and operation of mine-related equipment at the Brunswick Industrial Site, the County's third-party noise consultant shall retrieve and evaluate noise monitoring data to evaluate whether mine-related operational noise levels are in compliance with County noise standards at the pre-determined Receptor locations, using noise level data and noise attenuation calculations accounting for distance to the receptor locations. The results shall be submitted to the Nevada County Planning Department within one week from evaluation of the noise data. If the results indicate that the County noise standards are*			

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		being exceeded either by individual equipment or processes, or cumulative noise generation of the entire facility, operations shall cease until additional engineering controls can be implemented as needed. Such measures could take the form of noise barriers, installation of sound absorbing materials, use of additional silencers, etc. After implementation of any recommended measures, follow-up noise level data evaluation shall be conducted to demonstrate that the resultant operational noise levels comply with the County noise level standards at nearby sensitive receptors. *b. After the initial noise monitoring evaluation described under "a", the County's third-party noise consultant shall evaluate permanent noise monitoring data at the pre-determined receptor locations as follows: i) on a quarterly basis during the first five years of project operation; ii) once per year thereafter for the life of the project; and iii) in response to*			

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			public noise complaints. If the results indicate that the County noise standards are being exceeded, then the actions described in "a" shall be implemented to the satisfaction of the County.			
4.10-4	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	*4.10-4*	*The project applicant shall conduct a project-specific Ground Vibration Monitoring Program, as set forth in this mitigation measure. As part of the Ground Vibration Monitoring Program, the mine shall employ between eight and ten seismographs, which shall be installed prior to any onsite blasting, and used during all blasting of levels above the 1,000-foot level. The seismographs shall be placed at the following locations:* • *One at the Brunswick Shaft;* • *One at each of the four corners of the Mine Property;* • *One in the Whispering Pines Industrial Park;* • *Two at nearby residences; and* • *Two travelling seismographs which can change location depending on the weekly/monthly mining plan.* *After the mine has stopped blasting at the proposed shaft and above the 1,000-foot level, only five seismographs would be required for the Ground Vibration Monitoring Program. One seismograph shall be located*	Nevada County Planning Department	Prior to any on-site blasting, during all blasting of levels above the 1,000-foot level, and monthly	

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			at the Brunswick Shaft and one in each of the four corners of the mine property. The five seismographs would collect relevant data throughout the entire operation to understand how the ground is transmitting vibration in these areas. *Once mining operations commence, the project applicant shall hire a blast consultant to assist with the development of a 95 percent confidence level equation for the site-specific ground vibration. The blast consultant would take the data acquired by the seismographs set-up on the mine, run a linear regression and log-log confidence model to develop an equation that the mine can use to modify blasting, as needed, to ensure vibration levels remain below 0.4 in/s at sensitive receptors.* *Results of the Ground Vibration Monitoring Program and the equation for site-specific ground vibration shall be submitted to the Nevada County Planning Department, on a monthly basis, for review.*			
4.12 Transportation						
4.12-1	Conflict with a program, plan, ordinance, or policy addressing study intersections under EPAP Plus Project Conditions.	*4.12-1(a)*	*Brunswick Road/Idaho Maryland Road – Prior to issuance of building permits, the applicant shall pay the GVTIF to the City of Grass Valley. Proof of payment shall be submitted to the Nevada County Community Development Agency.*	Nevada County Community Development Agency	Prior to issuance of building permits	

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		4.12-1(b)	*<u>SR 174/Brunswick Road</u> – The project applicant shall enter into a Traffic Mitigation Agreement with the County regarding the SR 174/Brunswick Road intersection. The Agreement shall require the applicant to pay the project's fair share contribution toward the improvements necessary to improve intersection operations to an acceptable level. The Agreement shall include the fair share calculations and total payment amount. Based on the Caltrans methodology to assess fair share, it is estimated that the fair share percentage is 14.9%.*	Nevada County Planning Department	Prior to issuance of building permits	
		4.12-1(c)	*<u>Idaho Maryland Road/Centennial Drive</u> - Prior to issuance of building permits, the applicant shall pay the GVTIF to the City of Grass Valley. Proof of payment shall be submitted to the Nevada County Community Development Agency.*	Nevada County Community Development Agency	Prior to issuance of building permits	
4.12-6	Substantially increase hazards to vehicle safety due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	*4.12-6(a)*	*Prior to the commencement of construction and issuance of Encroachment Permits, construction signing and traffic control plans shall be provided to the Nevada County Public Works Department and the City of Grass Valley for review and acceptance. The construction signing and traffic control plan shall include (but not necessarily be limited to) items such as:* • *Guidance on the number and size of trucks per day entering and leaving the project site;*	Nevada County Public Works Department City of Grass Valley	Prior to the commencement of construction and issuance of Encroachment Permits	

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		• *Identification of arrival/departure times that would minimize traffic impacts;* • *Approved truck circulation patterns;* • *Locations of staging areas;* • *Locations of employee parking and methods to encourage carpooling and use of alternative transportation;* • *Methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);* • *Criteria for use of flaggers and other traffic controls;* • *Preservation of safe and convenient passage for bicyclists and pedestrians through/around construction areas;* • *Monitoring for roadbed damage and timing for completing repairs;* • *Limitations on construction activity during peak/holiday weekends and special events;* • *Preservation of emergency vehicle access;* • *Coordination of construction activities with construction of other projects that occur concurrently to minimize potential additive construction traffic disruptions, avoid duplicative efforts (e.g., multiple occurrences if similar*			

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		signage), and maximize effectiveness of traffic mitigation measures (e.g., joint employee alternative transportation programs); • *Removing traffic obstructions during emergency evacuation events; and* • *Providing a point of contact for residents and guests to obtain construction information, have questions answered, and convey complaints.* *The construction signing and traffic control plan shall be developed such that the following minimum set of performance standards is achieved throughout project construction.* • *All construction employees shall park in designated lots owned by the project applicant or on private lots otherwise arranged for by the project applicant.* • *Roadways shall be maintained clear of debris (e.g., rocks) that could otherwise impede travel and impact public safety.*			
		4.12-6(b) *Prior to any hauling of project materials (e.g., engineered fill, soil, rocks, etc.) on County or City roads, the project applicant shall enter into separate road maintenance agreements*	Nevada County	Prior to any hauling of project materials (e.g., engineered fill, soil, rocks, etc.) on	

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		with Nevada County and the City of Grass Valley to provide the project's fair share of funding for maintenance of roadways commensurate with the project's impact to pavement conditions on both Nevada County and Grass Valley roadways, including Brunswick Road between E. Bennett Road and SR 49 and E. Bennett Road between project driveway and Brunswick Road.	City of Grass Valley	County or City roads	
		4.12-6(c) Prior to approval of Encroachment Permit for driveway construction at the intersection of E. Bennett Road/Millsite Road, the Nevada County Public Works Department shall review and approve the improvement plans for the E. Bennett Road/Millsite Road intersection which need to include pavement widening and designation that only right-hand turns are allowed from the project site at this location. Prior to commencement of project operations, the E. Bennett Road/Millsite Road intersection shall be improved to the satisfaction of Nevada County Public Works Department, at the expense of the project applicant.	Nevada County Public Works Department	Prior to commencement of project operations, the E. Bennett Road/Millsite Road intersection shall be improved to the satisfaction of Nevada County Public Works Department, at the expense of the project applicant.	
		4.12-6(d) Prior to the County issuing any permits for work on the Centennial Industrial Site: 1) the project applicant shall submit plans to the Grass Valley Engineering Division and receive approval from the City of Grass Valley for widening of Whispering Pines Lane along the Centennial Industrial Site's	Grass Valley Engineering Division	Prior to the County issuing any permits for work on the Centennial Industrial Site, the project applicant shall submit plans to	

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		frontage for purposes of facilitating adequate truck turn movements into and out of the Site. The plans shall reflect a 12-foot two-way-left-turn-lane (TWLTL), a 12-foot travel lane, and a six-foot bicycle lane; 2) In addition, the applicant shall designate and record a landscape easement to mitigate sight distance concerns. The plans shall be approved by the City of Grass Valley and the project applicant shall be responsible for 100 percent of the cost for this improvement.		the Grass Valley Engineering Division and receive approval from the City of Grass Valley for widening of Whispering Pines Lane along the Centennial Industrial Site's frontage.	
		4.12-6(e) Prior to commencement of operations, the project applicant shall obtain an encroachment permit from Nevada County and install: 1) W51 "Slow Trucks" road sign along Brunswick Road, about 500 feet north of the E. Bennett Road intersection; 2) A second sign shall be installed at the applicant's expense just south of the crest of the grade, warning truck drivers of the transition in grade and presence of the downgrade Loma Rica Drive intersection.	Nevada County Planning Department	Prior to commencement of operations, the project applicant shall obtain an encroachment permit from Nevada County for the noted sign installation to be funded by the applicant.	
		4.12-6(f) Prior to the County issuing any permits for work on the Brunswick Site, the project applicant shall remove any landscaping over 2 feet in height inside the sight line from the project driveway to Brunswick Road.	Nevada County Planning Department	Prior to the County issuing any permits for work on the Brunswick Site, the project applicant shall remove any landscaping over 2 feet in height inside the sight line from	

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					the project driveway to Brunswick Road.	
4.12-8	Conflict with a program, plan, ordinance or policy addressing study intersections under Cumulative Plus Project Conditions.	*4.12-8(a)*	*SR 174/Brunswick Road – Implement Mitigation Measure 4.12-1(b).*	See Mitigation Measure 4.12-1(b)	See Mitigation Measure 4.12-1(b)	
		4.12-8(b)	*Sutton Way/Dorsey Drive - Prior to issuance of building permits, the applicant shall pay the GVTIF to the City of Grass Valley. Proof of payment shall be submitted to the Nevada County Community Development Agency.*	City of Grass Valley Nevada County Community Development Agency	Prior to issuance of building permits	
4.12-10	Conflict with a program, plan, ordinance or policy addressing intersection queues under the cumulative scenario.	*4.12-10*	*Prior to commencement of project operations, the Brunswick Road/Sutton Way intersection shall be re-timed to the satisfaction of the City of Grass Valley, at the expense of the project applicant. Based on the Caltrans methodology to assess fair share percentage, the fair share is 8.5 percent. Final payment amount shall be determined by the City of Grass Valley, and shall represent the reasonable cost of re-timing the intersection.*	City of Grass Valley Nevada County Planning Department	Prior to commencement of project operations	
4.13 Wildfire						
4.13-2	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the	*4.13-2*	*In conjunction with submittal of Improvement Plans, the applicant shall submit a comprehensive Vegetation Management Plan, inclusive of the Centennial and Brunswick Industrial Sites, for the review and approval by the County Fire Marshall's Office. The applicant shall implement all provisions of the Vegetation Management*	Nevada County Fire Marshall's Office	In conjunction with submittal of Improvement Plans	

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	uncontrolled spread of a wildfire.	*Plan during the project construction, operations, and reclamation activities. The Vegetation Management Plan shall include but not be limited to:* • *description of existing vegetative fuel sources;* • *description of vegetation removal during initial construction and inventory of equipment to be used;* • *requirement that exhausts of all equipment powered by gasoline, diesel, or other hydrocarbon fuel shall be equipped with effective spark arrestors designed to prevent the escape from the exhaust of carbon or other flammable particles over 0.0232 inches. Motor trucks, truck tractors, and passenger vehicles shall not be subject to this provision if their exhaust systems are equipped with mufflers;* • *requirement that all welding rigs shall be equipped with a minimum of one 20-pound or two 10-pound fire extinguishers;* • *description of proposed landscape planting types;* • *description and graphical presentation of defensible space zones;*			

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		• *long-term maintenance schedule and safety practices, addressing at a minimum:* o *Removal of fire prone fuels and dead material.* o *Removal of branches beneath large trees.* o *Maintenance of live plants, bushes, shrubs, and trees.* o *Removal of needles and leaves and other combustible debris and litter from roofs and gutters.* o *Annual grasses and forbs shall be cut down to a maximum height of four inches within 100 feet of structures and on engineered fill slopes.* o *Trimming of vegetation within specified horizontal distances from roadways and overhead power line(s), the latter of which may be implemented by PG&E as the service provider, consistent with clearance requirements in PRC Sections 4292 and 4293.* o *Seasonal removal of all dead and dying vegetation to reduce vegetation volume and ladder fuels.*			

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		o *Coordination with adjacent property owners, as applicable, to maintain tree canopies, vegetation and ladder fuels on an annual basis.* o *Horizontal and vertical spacing among shrubs and trees shall be created using the "Fuel Separation" method, the "Continuous Tree Canopy" method or a combination of both to achieve defensible space clearance requirements. Spacing shall be done in accordance with the State Board of Forestry and Fire Protection's, "General Guidelines for Creating Defensible Space, February 8, 2006."*			
Conditions of Approval					
COA-1	APM-AQ-1: Exhaust Emission Controls *The following measures shall be implemented during construction, operation, and reclamation to reduce exhaust emissions:* • *All off-road diesel-fueled equipment and emergency generators owned by Rise Grass Valley Inc. shall be equipped with Tier 4 Final engines.* • *Unnecessary construction vehicle idling time shall be minimized. The ability to limit construction vehicle idling time is dependent on the sequence of activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up*		Nevada County Planning Department	During construction, operation, and reclamation activities	

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		times following start-up that limit their availability for immediate use. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project shall apply a "common sense" approach to vehicle use such that idling is reduced as much as possible below the maximum of 5 consecutive minutes required by regulation (13 CCR 2449 and 2485). If a vehicle is not required for use immediately or continuously for activities or for other safety-related reasons, its engine shall be shut off. • *All off-road equipment shall be maintained in accordance with manufacturer's specifications. All equipment shall be checked by a qualified mechanic, and equipment shall be confirmed that it is in proper condition prior to operation.*			
COA-2	APM-AQ-2: Surface Fugitive Dust Controls *The following measures shall be implemented to reduce surface fugitive dust emissions:* • *During construction, operation, and reclamation, all exposed soil surfaces (e.g., unpaved disturbed areas, unpaved parking areas, and unpaved staging areas, and soil piles) shall be adequately wetted to ensure that no visible dust crosses the property boundary, except when rains are occurring. As an alternative to watering, inactive soil piles shall be covered to minimize wind erosion.* • *During construction, all on-site roadways shall be paved as soon as possible after grading and any unpaved gravel roads shall be treated with chemical stabilizers in order to control fugitive dust.*		Nevada County Planning Department	During construction, operation, and reclamation activities	

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COA-3		APM-AQ-3: ASUR Plan *Rise Grass Valley Inc. shall implement the ASUR Plan, which incorporates measures designed to minimize asbestos in engineered fill produced by the project, as well as minimize the emission of asbestos-containing dust from the underground mine (see Appendix E.2). The ASUR Plan builds on the provisions of applicable regulations, including the two CARB ATCMs for naturally occurring asbestos (i.e., ATCM for Surfacing Applications [17 CCR 93106] and ATCM for Construction, Grading, Quarrying and Surface Mining Operations [17 CCR 93105]), and includes additional measures beyond what is required in the ATCMs in order to limit any potential emission of asbestos dust and to protect human health and the environment. The ASUR Plan incorporates routine asbestos testing by TEM and an Asbestos Inventory to ensure that average mined material and engineered fill contains less than 0.01 percent asbestos by mass of PCM equivalent units.*	Nevada County Planning Department	During project operations	
COA-4	*In the event that sand tailings or waste rock material is transported from the Brunswick Site prior to 2033 to locations other than the Centennial Site, all transport of such material shall be accomplished using electric vehicles.*		Nevada County Planning Department	In the event that sand tailings or waste rock material is transported from the Brunswick Site prior to 2033 to locations other than the Centennial Site	
COA-5	*Except for the construction of the proposed Service Shaft, all underground blasting for production, tunnelling, and raising would take place more than 500 feet below ground surface and no underground mining will take place outside of the area denoted on the maps included in Appendix A of the Final EIR.*		Nevada County Planning Department	During blasting activities	
COA-6	*The following measures have been added to the Domestic Well Monitoring Program, and shall be included as a condition of approval for the Project:* *1) Property owner's shown in Table 1 will be contacted at least three months prior to commencement of the required 12-month groundwater monitoring period and the company will request permission to inspect and install monitoring equipment at the well.*		Nevada County Planning Department	As part of the Domestic Well Monitoring Program implementation	

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		2) Property owners who respond and grant permission for well monitoring will be added to the Domestic Well Monitoring Program. *3) The well will be inspected to determine the characteristics of the well, including location, well depth, casing and screen depth, static water level, and well yield. A water quality sample will be taken during the inspection.* *4) Instrumentation will be installed to measure water level on a periodic basis (such as 1 or 4 hours) and pumping rates (to correlate water level with the wells use). Data from the instruments will be transmitted by telemetry.* *5) Water level data will be collected for at least 12 months prior to the commencement of mine dewatering and will continue throughout the period of initial mine dewatering (dewatering of the historic mine workings) and for at least the first 5 years of operations.* *6) All data collected and reports generated will be provided to the property owner and to Nevada County.* *7) All costs of well monitoring will be paid by the company and well monitoring equipment will remain the property of the company. A property owner may terminate well monitoring upon request and the company will remove any installed monitoring equipment.* *8) For any well that is monitored under the Domestic Well Monitoring Program, monitoring results will be used to supplement the analysis from the Groundwater Monitoring Plan to determine whether an individual groundwater well is expected to be impacted or has been impacted by dewatering operations, using the threshold set forth in the Well Mitigation Plan.*			
COA 7	*The applicant shall be required to install all noise reducing project features and equipment included in the Project Description, and assumed in the noise impact analysis included in Chapter 4.10 of the DEIR. While the applicant is not required to use the specific brands and models assumed in the DEIR, the applicant shall be required to demonstrate that the noise reducing project features and equipment actually installed as part of the project achieve the same or better noise reduction as was assumed in the DEIR. The applicant shall be required to provide specifications on all installed noise reduction features and equipment to the County*		Nevada County Planning Department	During construction, operation, and reclamation activities	

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	to verify that the noise reductions comply with the assumptions in the DEIR. Further, the County will verify and enforce use and operation of noise reduction equipment and features through implementation of Mitigation Measure 4.10-3.				
COA 8	*The applicant shall be required to use only electrical, pneumatic, or battery powered mining equipment in the underground mine.*		Nevada County Planning Department	During mining activities	
COA 9	*The project will not burn vegetative material. Processing of vegetation before placement of engineered fill will be done by chipping.*		Nevada County Planning Department	During construction, operation, and reclamation activities	
COA 10	*The applicant will be required to provide one-week notice of any expected flow interruptions when feasible, and notice of any spill or contaminating event. Additionally, the applicant will be required to provide NID access to real-time flow data of South Fork Wolf Creek directly downstream from the Project's discharge, with 15-minute interval data, with a trend history of at least one week. The County will not require the flow data to be publicly available, but the data may be made publicly available at the applicant's or NID's discretion.*		Nevada County Planning Department	One week prior to, and during, any expected flow interruptions, and in the event of any spill or contaminating event	
COA 11	*To ensure that reclamation will proceed in compliance with the approved Reclamation Plan, the County shall require security that will be released upon satisfactory performance. The Project Applicant may post security in the form of a surety bond, trust fund, irrevocable letter of credit from an accredited financial institution, or other method acceptable to the County and the State Mining and Geology Board as specified in State regulations, and which the County reasonably determines are adequate to perform reclamation in accordance with the mining operation's approved Plan.*		Nevada County Planning Department	Prior to commencement of mining operations	
COA 12	*Except for the construction of the proposed Service Shaft, all underground blasting for production, tunnelling, and raising would take place more than 500 feet below ground surface and no underground mining will take place outside of the area denoted on the maps included in Appendix A of the Final EIR.*		Nevada County Planning Department	Prior to approval of improvement plans and during construction and operation	